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Anika S. Cooper
Chief Counsel, Office of the Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: The Great Walton Railroad Company—Petition for Declaratory Order,
AB 1242_1. Renewed Request for Expedited Consideration

Dear Chief Counsel,

This letter seeks to advise the Board of events that have occurred, since March 2025, that support The Great Walton Railroad's ("GWRC's") request for expedited consideration of its petition for declaratory order. In its petition, GWRC sought a final determination of whether a 0.25-mile segment of its line of railroad between Hartwell, GA and Bowersville, GA, which includes a 258 foot segment of GWRC's runaround track, is part of the interstate rail network.¹ GWRC's petition was filed on November 20, 2019.²

In March 2025, GWRC hired an independent third party to inspect GWRC's trestle over Log Cabin Creek, which is located at the western edge of Hartwell at milepost 1.40. The trestle leads directly to Redline Plastics' facilities

¹ The 0.25 mile segment lies at the tail-end of GWRC's line of railroad between Bowersville and Hartwell. In recent years it has been used solely to reposition locomotives to the front of the train for the return trip to Bowersville from Redline Plastics 2, LLC ("Redline Plastics"), which is GWRC's only customer. Redline Plastics' facility is located at milepost 1.3.

² This letter does not repeat or address the arguments addressed in the series of recent pleadings filed by the Hartwell First Methodist Church and the Great Walton Railroad Company between September 26, 2024 and December 17, 2024. Those pleadings traced the proceedings (before the Board and courts in Georgia) that have occurred since the Hart County Superior Court, on November 28, 2016, issued an emergency injunction that prevented GWRC from restoring a 258-foot segment of its runaround track that was constructed in 1913.

on the east side of the Creek. The inspection revealed extreme defects in stringers, bridge ties and piles, that required GWRC to place an embargo on movements over the trestle. That report caused GWRC to request another entity to inspect the submerged portions of the trestle. GWRC has recently been advised that in order to determine the full extent of submerged defects and deficiencies, further extensive inspections will be required. These inspections will involve the use of a three-person dive team to identify all of the observed defects and deficiencies and prepare recommendations regarding necessary repairs.

GWRC has never had any intent to abandon any segment of its Line between Hartwell and Bowersville. However, the instant proceeding, which was first initiated in May 26, 2016, has created a financial predicament. To prevent any adverse impact on Redline Plastics' manufacturing operations, GWRC has agreed to split the cost of trucking with Redline Plastics (which has testified that it is dependent on GWRC's rail service) until the trestle can be fully restored. However, GWRC must also consider the potential harsh financial consequences of investing its limited financial resources to restore the trestle if the Board were to issue an adverse decision after GWRC has expended extensive funds necessary to restore the trestle.

As the Georgia Court of Appeals recognized, because the Board's jurisdiction over whether GWRC's runaround track is part of the national rail transportation is exclusive, the Board must reach the final decision. Because GWRC considers the runaround tract to be an essential element of GWRC's efforts to provide safe, reliable and economical service to Redline Plastics, GWRC renews its request for expedited consideration of whether the runaround track is part of the national rail transportation network. Plainly, the prompt resolution of that issue is essential so that GWRC can rationally address the issues associated with the trestle over Log Cabin Creek.

Respectfully submitted,

/s/ Richard H. Streeter

Richard H. Streeter

Cc: A true copy has been served via email on ehocky@clarkhill.com, who is the only party of record in this proceeding.