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December 18, 2007

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Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

221057

RE Docket No. AB-364 (Sub-No 12X). *Mid-Michigan Railroad, Inc.*
Abandonment Exemption—in Kent and Ionia Counties, MI



Dear Secretary Williams,

Enclosed are the original and 10 copies of a Petition for Exemption for the *Mid-Michigan Railroad, Inc. ("MMRR")* to abandon a 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI. Also enclosed are a check from MMRR for the filing fee of \$5,400, and a computer diskette containing the Petition in Word and pdf format. All of the color Exhibits are attached to the end of the Petition in Exhibit I.

Please time and date stamp the additional copy of this letter and the Petition and return them with our messenger. Thank you for your assistance.

If you have any questions please call or email me.

Sincerely yours,

Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

FEE RECEIVED

DEC 18 2007

**SURFACE
TRANSPORTATION BOARD**

FILED

DEC 18 2007

**SURFACE
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DEC 18 2007

Part of
Public Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No AB-364 (Sub-No 12X)

**MID-MICHIGAN RAILROAD, INC –ABANDONMENT EXEMPTION–
IN KENT AND IONIA COUNTIES, MI**

PETITION FOR EXEMPTION

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**Attorneys for MID-MICHIGAN
RAILROAD, INC**

Dated: December 18, 2007

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No AB-364 (Sub-No. 12X)

**MID-MICHIGAN RAILROAD, INC – ABANDONMENT EXEMPTION–
IN KENT AND IONIA COUNTIES, MI**

PETITION FOR EXEMPTION

Mid-Michigan Railroad, Inc ("MMRR") petitions the Surface Transportation Board ("Board") to exempt, under 49 U.S.C. § 10502, MMRR's abandonment of a 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI (the "Line") from the prior approval requirements of 49 U.S.C. §§ 10903 and 10904. MMRR also requests the Board to establish a procedural schedule

Abandonment will allow MMRR to avoid costs incurred by continued ownership of the Line. MMRR has entered a Memorandum of Understanding (the "MOU") to sell the Line to West Michigan Trails and Greenway Coalition ("WMTGC") for interim trail use/rail banking. In 2006 there were two shippers using the Line, Gallagher Farm Service ("Gallagher") and Standard Lumber, both located near Ionia. Gallagher shipped eight cars in 2004, 11 cars in 2005, 15 cars in 2006, and nine cars through June 2007. Standard Lumber shipped one car in 2004, two cars in 2005, two cars in 2006, and one car through June 2007. Traffic on this 15.83-mile line has been very light since 2004. There is no longer sufficient demand for rail service to justify the costs incurred by MMRR in maintaining, operating, and owning the Line.

PROPOSED TRANSACTION

MMRR proposes to abandon a 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI. The Line traverses Zip Codes 48846, 48881, and 49331. A colored map of the Line is attached as Exhibit A. Exhibit B consists of the Combined Environmental and Historic Report. The draft Federal Register Notice is in Exhibit C, and copies of the newspaper publication and the required certification are in Exhibit D. The certificate of service is in Exhibit E. Exhibit F contains the Verified Statement of Mark D. Garvin, Chief Engineer for all of the subsidiary railroads of RailAmerica, Inc. Mr. Garvin addresses that value of the track and material on the Line, the need for rehabilitation, and the cost of maintenance. Exhibit G contains the Verified Statement of Mr. Robert M. Frelich, Jr., and addresses the costs of operating over the Line. In Exhibit H, Mr. Todd N. Cecil, Vice President-Real Estate, presents the value of the real estate.

Based on information in MMRR's possession, the Line does not contain federally granted right-of-way. Any documentation in MMRR's possession concerning title will be made available to those requesting it. There are stations at Lowell, Saranac, and Ionia.

BACKGROUND

The Line was sold by the Grand Trunk Western Railroad Company in 1986 and MMRR acquired the Line in 1999.¹ The two shippers on the Line are located near Ionia, near the end of

¹ *RailTex, Inc., Mid-Michigan Railroad, Inc., Michigan Shore Railroad, Inc., and Grand Rapids Eastern Railroad, Inc.—Corporate Family Transaction Exemption*, STB Finance Docket No. 33693 (STB served January 20, 1999).

the Line. Although there has been an increase in traffic since 2004, the volume does not justify the continuing operation of the Line, especially in light of the value of the assets on the Line

The following chart shows the year, number of shipments by shipper, and total revenue

	Standard Lumber	Gallagher Fertilizer	Gross Revenue
2004	1	8	\$ 4,570 00
2005	2	11	\$ 6,399 00
2006	2	15	\$ 8,772.00
2007	<u>2</u>	<u>20</u>	<u>\$12,158.00²</u>
Total	7	54	\$31,899 00

The demand for service over the Line is very light. The Line is listed as FRA Class I track. As described below, abandoning the Line will permit MMRR to save (1) rehabilitation costs of \$331,000, (2) annual operating losses of \$21,159, (3) the annual maintenance costs of \$79,150 and (4) opportunity costs of \$489,854. MMRR will salvage the track and materials, which have an estimated net liquidation value of \$1,783,045. In addition, MMRR will sell the Line for future interim trail use/rail banking. The value of the real estate is about \$1,012,000 based on the negotiations conducted by Mr. Cecil (See Exhibit H) and Mr. Cecil's expert analysis of the valuation of real estate.

Upon receipt of abandonment authority, MMRR plans to salvage the track and materials on the Line, but leave the bridges and culverts necessary for interim trail use/rail banking in place as per the MOU with WMTGC. Some of the track and materials will be sold as scrap and the remainder will be used by MMRR and its railroad affiliates. MMRR will sell the real estate to the trail user to convert the active rail line to interim trail use/rail banking.

² The totals for 2007 are annualized based on actual traffic moving in the first six months of 2007 of one car for Standard Lumber and nine cars for Gallagher Fertilizer generating \$6,074 in gross revenue.

A. There is little traffic on the Line.

Traffic on the Line has been steady, but very light over the past four years. As noted in the table above, there were nine carloads in 2004, 13 carloads in 2005, 17 carloads in 2006, and 22 carloads in 2007 (based on annualizing carloads through June 2007). The traffic has not even generated enough annual revenue to cover the operating costs of the Line, estimated by Mr. Frelich to be \$21,159.

Because of the low level of traffic, MMRR is burdened with retaining a rail line that does not generate sufficient rail freight revenue to cover the costs of operations, much less maintenance costs and opportunity costs.

B. MMRR will incur costs to rehabilitate the Line.

The Line is currently in Federal Railroad Administration Class I condition. Since there has been very little traffic over the Line in recent years, MMRR has deferred maintenance on the Line. In his attached Verified Statement, Mr. Garvin explains that to keep the Line in FRA Class I, MMRR will be required to make \$331,000 in capital expenditures to rehabilitate the Line. This will include \$275,000 in bridge repairs and \$56,000 to repair road crossings.

C. MMRR will incur costs to maintain the Line.

The Line is 15.83 miles in length. The Board has accepted a range of normalized maintenance of way costs of between \$4,300 and \$6,000 in recent decisions.³ MMRR will adopt a conservative annual normalized maintenance cost of \$5,000 per mile.⁴ Mr. Garvin has

³ *Wisconsin Central Ltd –Abandonment–in Ozaukee, Sheboygan and Manitowoc Counties, WI*, STB Docket No. AB-303 (Sub-No. 27), STB served October 18, 2004, at 8, and *Minnesota Northern Railroad, Inc –Abandonment Exemption–in Polk and Norman Counties, MN*, STB Docket No. AB-497 (Sub-No. 3x) (STB served December 4, 2006), at 2.

⁴ *Central Michigan Railway Company–Abandonment Exemption–in Saginaw County, MI*, STB Docket No. AB-308 (Sub-No. 3X) (STB served October 31, 2003), at 5.

reviewed an annual average \$5,000 per mile normalized maintenance cost and found it to be in line with the maintenance costs incurred across the MMRR. Therefore, after MMRR makes the expenditure to eliminate deferred maintenance on the Line, MMRR will incur annual maintenance costs for the Line of about \$79,150.

D. Calculation of opportunity costs.

Opportunity costs (or total return on value of road property) reflect the economic loss experienced by a carrier from forgoing a more profitable alternative use of its assets. Under *Abandonment Regulations—Costing*, 3 I.C.C.2d 340 (1987), the opportunity cost of road property is computed on an investment base equal to the sum of: (1) allowable working capital; (2) the net liquidation value (NLV) of the line; and (3) current income tax benefits (if any) resulting from abandonment. The investment base (or valuation of the road properties) is multiplied by the current nominal rate of return, to yield the nominal return on value. The nominal return is then adjusted by applying a holding gain (or loss) to reflect the increase (or decrease) in value a carrier will expect to realize by holding assets for 1 additional year.⁵

1. Calculation of net salvage value (“NSV”).

Mr. Garvin is the Chief Engineer for RailAmerica, Inc. (“RailAmerica”). He is responsible for the development of maintenance and rehabilitation plans for RailAmerica’s subsidiary railroads. Based on MMRR’s records, an inspection of the Line, the latest costs of rail materials, and the cost of removal and transportation, Mr. Garvin calculates the NSV of the Line to be \$1,783,045 (See Exhibit F and the Exhibit thereto).

2. Calculation of the value of real estate (“VRE”).

The VRE has been calculated by Mr. Cecil to be \$1,012,000, based on the MOU and Mr. Cecil’s vast experience. Hence, the net liquidation value (“NLV”) of the Line is \$2,795,045.

⁵ *Wisconsin Central Ltd—Abandonment—in Ozaukee, Sheboygan and Manitowoc Counties, WI*, STB Docket No. AB-303 (Sub-No. 27) (STB served October 18, 2004), at 10-11.

3. Calculation of 15 days working capital.

Mr. Frelich calculated the cost of operating the Line to be \$21,159 per year. Working capital for the computation of opportunity costs is calculated as 15 days of the costs of the Line. Therefore, MMRR has totaled the operating costs and maintenance costs (\$100,309), divided them by 365 and multiplied that amount by 15 to arrive at the 15 days of working capital of \$4,122.

4. Nominal cost of capital.

The Board has recently accepted the nominal cost of capital for a Class III railroad of 17.50 percent.⁶ Therefore, MMRR has decided to use 17.50 percent as the nominal cost of capital in calculating the opportunity costs of the Line.

5. Income tax consequences.

The book value of the Line is \$2,795,045. The NLV of \$2,795,045 less the book value yields no gain. Therefore, sale of the Line will have no tax consequences.

6. Holding gain.

Because of the volatility of the market for scrap and reusable steel and the decline in the market for real estate, MMRR estimates that there will be no holding gain or loss in the current economic environment. The Board has accepted such an analysis.⁷

⁶ *Southwestern Railroad Company, Inc.—Abandonment Exemption—in Ellis County, OK, and Lipscomb, Ochiltree, and Hansford Counties, TX*, STB Docket No. AB-341 (Sub-No. 1X) (STB served November 20, 2007).

⁷ *Id.* at 2.

7. Calculation of Opportunity Costs.

The following Table shows the opportunity cost calculation

Working Capital	\$ 4,122
NLV	\$2,795,045
Taxes	\$ 0
Holding Gain	\$ 0
Valuation	\$2,799,167
Nominal Rate of Return	17.50
Opportunity Cost	\$ 489,854

E. Alternate transportation.

The Line is criss-crossed by roads between Lowell and Ionia Michigan Route 21 runs between Lowell and Ionia. Interstate 96 runs south of the Line and is connected to Lowell by Michigan Route 50 and to Ionia by Michigan Route 66 The limited traffic on the Line has readily available highway alternates to rail transportation

F. Summary.

Continued ownership and operation of the Line by MMRR will continue to be a burden on MMRR and interstate commerce. MMRR will incur rehabilitation costs of \$331,000, annual maintenance costs of \$79,150, annual operating costs of \$21,159, and opportunity costs of \$489,854 MMRR will be able to sell the real estate for interim trail use/rail banking for about \$1,012,000 and will be able to reuse or sell the track and materials, which is valued at about \$1,783,045 In addition, there is alternate transportation service available

There will be minimal, if any, harm to rail shippers. The volume of traffic does not generate enough revenue to cover the costs of operating over the Line, much less maintenance costs, rehabilitation costs, or opportunity costs.

MMRR contends that in balancing the harm to itself and interstate commerce against the harm to shippers and local interests, the balance clearly favors abandonment.

ARGUMENT SUPPORTING THE ABANDONMENT

MMRR seeks an exemption under 49 U.S.C. § 10502 from the applicable requirements of 49 U.S.C. §§ 10903 and 10904 in order to abandon the Line and convert it to interim trail use/rail banking.

Under 49 U.S.C. § 10502, the Board must exempt a transaction from regulation when it finds that:

(1) regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and

(2) either

(a) the transaction is of limited scope, or

(b) regulation is not necessary to protect shippers from the abuse of market power.

The legislative history of Section 10502 reveals a clear Congressional intent that the Board should liberally use its exemption authority to free certain transactions from the administrative and financial costs associated with continued regulation. In enacting the Staggers Rail Act of 1980, Pub. L. No. 96-488, 94 Stat. 1895, Congress encouraged the Board's predecessor agency to liberally use the expanded exemption authority under former Section 10505.

The policy underlying this provision is that while Congress has been able to identify broad areas of commerce where reduced regulation is clearly warranted, the Commission is more capable through the administrative process of examining specific regulatory provisions and practices not yet addressed by Congress to determine where they can be deregulated consistent with the policies of Congress. The conferees expect that, consistent with the policies of this Act, the Commission will pursue partial and complete exemption from remaining regulation.

H R Rep No 1430, 96 the Cong 2d Sess. 105 (1980) See also *Exemption From Regulation--Boxcar Traffic*, 367 I C C 424, 428 (1983), vacated and remanded on other grounds, *Brae Corp v United States*, 740 F 2d 1023 (D.C Cir 1984) Congress reaffirmed this policy in the conference report accompanying the ICC Termination Act of 1995, Pub L. No. 104-88, 109 Stat 803, which re-enacted the rail exemption provision as Section 10502. H R Rep No 422, 104th Cong., 1st Sess. 168-69 (1995).

A. The Application of 49 U.S.C. § 10903 Is Not Necessary to Carry Out the Rail Transportation Policy

Detailed scrutiny of this transaction is not necessary to carry out the rail transportation policy. An exemption would minimize the unnecessary expense associated with the preparation and filing of a formal abandonment application, expedite regulatory decisions and reduce regulatory barriers to exit. 49 U.S.C. § 10101 (2) and (7) The abandonment by MMRR will result in a loss of minimal rail service. Traffic on the Line does not generate sufficient revenue to cover the costs of operation of \$21,159.

Although MMRR will forego annual revenue from the Line of about \$12,158, MMRR will avoid rehabilitation costs of \$331,000, annual maintenance costs of \$79,150, annual operating costs of \$21,159, and opportunity costs of \$489,854. MMRR will receive \$1,783,045 for salvaging the track and material in the Line and \$1,012,000 for the real estate. The Line will be converted to interim trail use/rail banking. Granting this exemption, therefore, fosters sound economic

conditions and encourages efficient management by permitting the rationalization of an unnecessary rail line 49 U.S.C. § 10101 (3), (5) and (9) “An exemption would also foster sound economic conditions and encourage efficient management by relieving [the railroad] of the out-of-pocket expenses and significant opportunity costs associated with retaining the underutilized line [49 U.S.C. 10101(5) and (9)].”⁸

Other aspects of the rail transportation policy are not adversely affected. For example, competition and the continuation of a sound rail transportation system are not affected since the public will not be deprived of any needed rail services.

B. This Transaction Is Of Limited Scope

The proposed transaction is of limited scope. MMRR seeks to abandon a 15.83-mile line in two counties and two cities in Michigan.

C. This Transaction Will Not Result In An Abuse Of Market Power.

MMRR is abandoning the Line. There are two active shippers located on the Line, but on an annualized basis, they are expected to ship only 22 carloads in 2007, generating gross revenue to MMRR of \$12,158. There is alternate transportation available over the highways in the area.

THE ABANDONMENT SHOULD BE EXEMPTED FROM THE OFFER OF FINANCIAL ASSISTANCE PROVISIONS

There has been very little rail traffic over the Line in the past four years. The volume of traffic does not cover the costs of operation, much less the opportunity costs of \$489,854. Based on per car revenue for 2007 of \$552 per car, in order to cover opportunity costs, an owner of the Line would need to handle at least 950 car loads per year. Even at that volume, the line would

⁸ *Georgia Southwestern Railroad, Inc. — Abandonment and Discontinuance Exemption—in Harris and Meriwether Counties, GA*, STB Docket No. AB-1000 (Sub-No. 1X) (STB served December 10, 2007) at 3.

not cover its operating or maintenance costs. MMRR contends that including the carrying costs for acquiring the Line and the realistic level of traffic, it is highly unlikely that anyone would be able to make a legitimate offer of financial assistance and continue to provide rail service over the Line

WMTGC has entered an MOU to acquire the Line from MMRR for interim trail use/rail banking. It is obvious that the Line is no longer required to provide common carrier service and there is another public use for the Line

The Board has often observed that the offer of financial assistance ("OFA") process takes priority over converting a rail line to interim trail use/rail banking "OFAs to acquire rail lines for continued rail service or to subsidize rail operations take priority over interim trail use/rail banking"⁹ MMRR requests the Board to reevaluate this position where, as here, there is insufficient traffic on a rail line to provide a realistic opportunity for a successful operation if the line is acquired through the OFA process. Such an exception could deter the use of the OFA process for any purpose other than continued rail service.

Permitting the abandonment to become effective without application of the OFA process will minimize the need for federal regulatory control over the rail system, expedite the Board's regulatory decisions, and reduce the regulatory barriers to exit from unprofitable rail service 49 U.S.C. § 10101(2) and (7) The Board and its predecessor, the Interstate Commerce Commission have granted exemptions from 49 U.S.C. § 10904 (previously 49 U.S.C. § 10905) where the right-of-way is needed for a valid purpose and there is no overriding public need for continued

⁹ *Rail Abandonments—Use of Rights-of-Way As Trails*, 21 C.C 2d 591, 608 (1986).

rail service.¹⁰ There is an MOU for MMRR to sell the Line to WMTGC for the public purpose of converting it to interim trail use/rail banking

The Line has had minimal use There is not enough traffic on the Line to cover the carrying costs of acquiring the Line, much less the costs of operating and maintaining the line In MMRR's opinion, the Line is not a viable OFA candidate. The imposition of the OFA provisions would delay or could completely frustrate the acquisition of the Line for the purpose of interim trail use/rail banking The acquisition could be delayed for at least six months, if not more if this abandonment were subjected to the OFA provisions The Line is not needed for common carrier rail service. It is appropriate for the Board to foster the conversion of this active rail line to interim trail use/ rail banking by exempting this abandonment from the OFA provisions. The Board has stated "We have granted exemptions from these provisions from time to time, when appropriate."¹¹ MMRR contends that the proposal here is appropriate for an exemption from the OFA provisions

Because there is very little traffic on the Line and there is alternate transportation available, it is clear that the proposed exemption from 49 U.S.C. § 10904 presents no opportunity for an abuse of market power. Exemption from the OFA provisions is also limited in scope

¹⁰ See, *Doniphan, Kensett and Searcy Railway—Abandonment Exemption—In Searcy, White County, AR*, STB Docket No. AB-558X (STB served May 6, 1999), *Union Pacific Railroad Company—Abandonment Exemption—In Salt Lake County, UT*, STB Docket No. AB-33 (Sub-No. 116X) (STB served September 30, 1998); *K & E Railway Company—Abandonment Exemption—In Alfalfa, Garfield, and Grant Counties, OK and Barber County, KS*, STB Docket No. AB-480X (STB served December 31, 1996); and *Southern Pacific Transportation Company—Discontinuance of Service Exemption -In Los Angeles County, CA*, ICC Docket No. AB-12 (Sub-No. 172X) (ICC served December 23, 1994).

¹¹ *CSX Transportation, Inc. Abandonment Exemption—in Genesee County, MI*, STB Docket No. AB-55 (Sub-No. 633X) (STB served July 25, 2007)

because MMRR seeks the exemption for a 15 83-mile line in two counties and in one state, Michigan

REQUEST FOR PROCEDURAL SCHEDULE

MMRR respectfully requests the Board to adopt a procedural schedule in this proceeding permitting any party to submit a reply to the Petition, as a matter of right, and permitting MMRR to file rebuttal to those replies as a matter of right. MMRR contend that the Board's rules at 49 C.F.R. §§ 1152.60 (the "Abandonment Exemption Rules"), 1121 (the "Exemption Rules"), and 1112 (the "Modified Procedure Rules") as well as 49 U.S.C. § 10502 permit the opening of the type of proceeding proposed by MMRR.

MMRR is requesting the Board to commence a proceeding and establish a procedural schedule so that any party seeking to comment on the proposed abandonment has a right to comment and submit evidence, and so that MMRR has an opportunity to respond. MMRR believes that the proposed abandonment may generate comments.

Under 49 U.S.C. § 10502(b), the "Board may, where appropriate, begin a proceeding under this section on its own initiative or on application by ... an interested party." MMRR contends that it is appropriate to begin a proceeding in this matter.

The Board has adopted special rules applicable to petitions for exemption involving the abandonment of a rail line. 49 C.F.R. § 1152.60. Procedurally, those rules require that within 20 days of the filing of the petition the Board, through the Director of the Office of Proceedings, publish a notice of the filing in the *Federal Register*. 49 C.F.R. § 1152.60(a). Where the Abandonment Exemption Rules are not in conflict with the Exemption Rules, the Exemption Rules apply. *Id.* Under the Exemption Rules "the Board may consider during its deliberation any public comments filed in response to a petition for exemption." 49 C.F.R. § 1121.4(a). The

Exemption Rules also permit the Board to “[d]irect that additional information be filed ” 49 C.F.R. §1121.4(c)(1)(i). The Modified Procedure Rules permit the Board to develop a record in writing (49 C.F.R. § 1112.1) and set out a schedule (49 C.F.R. § 1112.2).¹²

MMRR is requesting the Board to give effect to all of these rules and adopt a schedule similar to that used in abandonment application proceedings. See 49 C.F.R. § 1152.26(a).

MMRR proposes that the Board adopt and publish in the notice in the *Federal Register*, the following schedule

December 18, 2007—Petition for Exemption filed

January 7, 2008—Due date for Notice of Petition to be published in the *Federal Register*.

February 1, 2008—Due date for protests and comments, including opposition case-in-chief, and for public use and trail use requests.

February 15, 2008—Due date for MMRR's reply to opposition case and for MMRR's response to trail use requests

April 3, 2008—Due date for service of decision on the merits

April 11, 2008—Due date for offers of financial assistance, unless exempted by the Board

MMRR's request is consistent with the Board's recent practice. The Board instituted a proceeding upon the request of the petitioner, established a procedural schedule permitting interested parties to submit comments, and permitted the petitioner to respond as a matter of right. Similarly, MMRR seeks the establishment of a procedural schedule in this proceeding.¹³

¹² See, e.g. *Chicago, R. I. & P. R. Co. Abandonment*, 363 I.C.C. 150 (1980).

¹³ *Michigan Central Railway, LLC—Acquisition and Operation Exemption—Lines of Norfolk Southern Railway Company*, STB Finance Docket No. 35063 (STB served August 2, 2007)

MMRR has presented its case-in-chief in this Pctition MMRR respectfully requests the Board to notify potential parties in the *Federal Register* notice that a procedural schedule is being adopted similar to the one used for abandonment applications

COMBINED ENVIRONMENTAL AND HISTORIC REPORT

A Combined Environmental and Historic Report is in Exhibit B.

FEDERAL REGISTER NOTICE

A draft Federal Register notice is attached hereto as Exhibit C

LABOR PROTECTION

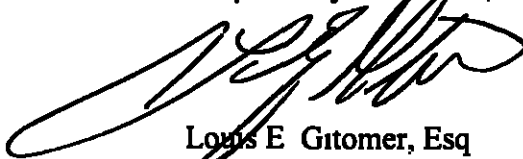
The interests of railroad employees of MMRR who may be adversely affected by the proposed abandonment will be adequately protected by the labor protective conditions in *Oregon Short Line R Co --Abandonment--Goshen*, 360 I.C.C. 91 (1979).

CONCLUSION

Application of the regulatory requirements and procedures of 49 U.S.C. §§ 10903 and 10904 to the abandonment of the Line proposed by MMRR is not required to carry out the rail transportation policy set forth in 49 U.S.C. § 10101, as previously shown. Nor is Board regulation required to protect shippers from the abuse of market power. Moreover, this abandonment is of limited scope. Adoption of a procedural schedule is warranted in this proceeding.

Accordingly, MMRR respectfully urges the Board to grant an exemption for the proposed abandonment of the Line and from the OFA provisions, and establish the proposed procedural schedule.

Respectfully Submitted,



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Attorneys for: MID-MICHIGAN
RAILROAD, INC

Dated December 18, 2007

EXHIBIT A-MAP

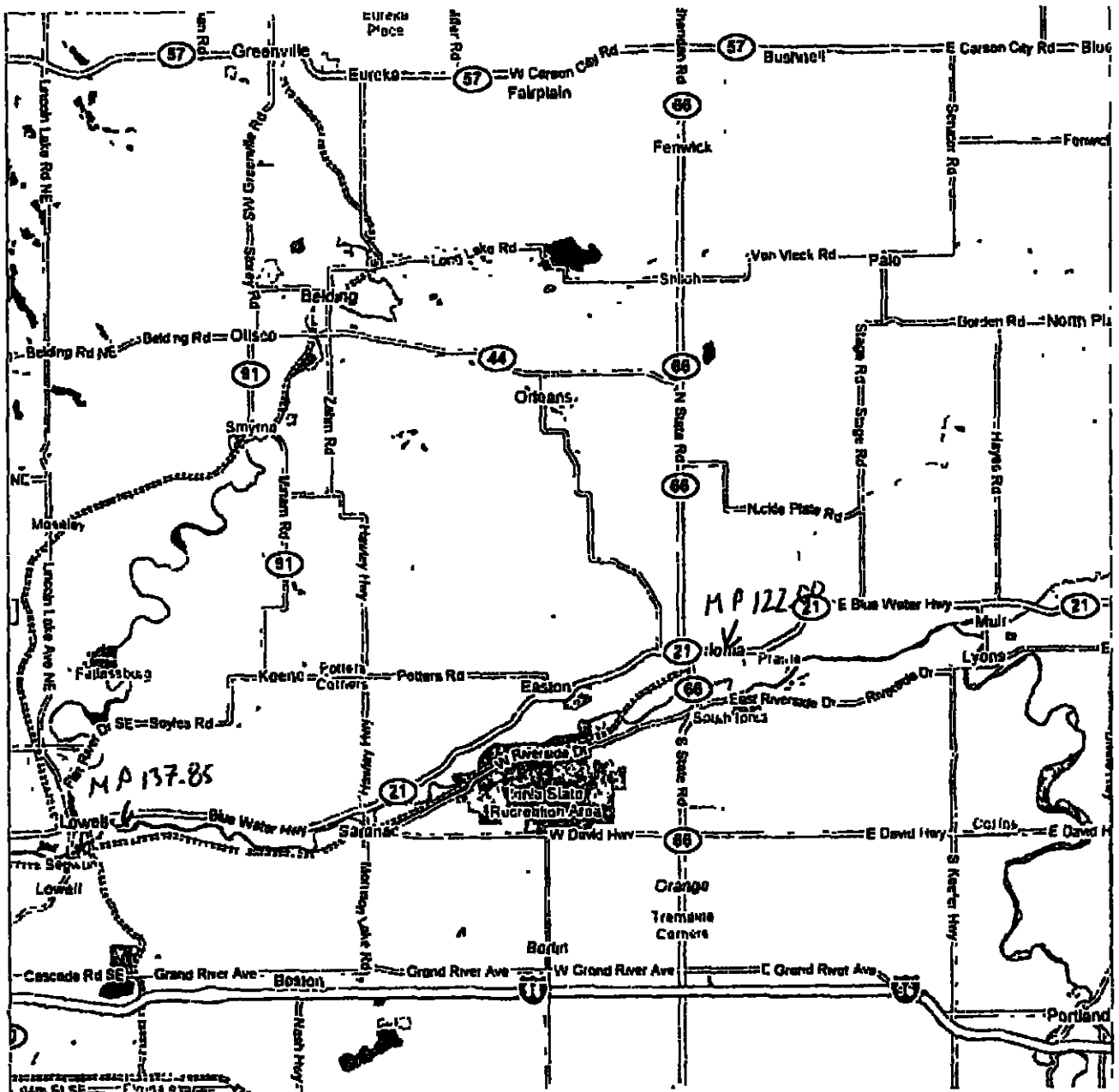


EXHIBIT B—COMBINED ENVIRONMENTAL AND HISTORIC REPORT

CERTIFICATE OF SERVICE OF COMBINED ENVIRONMENTAL AND HISTORIC REPORT

Pursuant to the requirements of 49 C.F.R. §1105 7(c) and 8(c), the undersigned hereby certifies that a copy of the Combined Environmental and Historic Report in Docket No. AB-364 (Sub-No 12X) was mailed via first class mail on October 22, 2007, to the following parties.

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Michigan Neighborhood Builders Alliance
P.O. Box 30242
Lansing, MI 48909

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County Administrator
Kent County
County Administration Building
300 Monroe Avenue, NW
Grand Rapids, MI 49503-2206

Michigan Historic Center
702 West Kalamazoo Street
P.O. Box 30740
Lansing, MI 48909-8240

Michigan Department of Environmental Quality
P O. Box 30473-7973
Lansing, MI 48909

Detroit District Headquarters
U S Army Corps of Engineers
Detroit District
477 Michigan Ave.
Detroit, MI 48226

USDA Natural Resources Conservation Service
3001 Coolidge Street
East Lansing, MI 48823-6350

U S. Environmental Protection Agency
Region 5
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Office of Strategic Environmental Analysis
77 West Jackson Boulevard
Mailcode B-19J
Chicago, IL 60604

U S Fish and Wildlife Service
Region 3
One Federal Drive
BHW Federal Building
Fort Snelling
Twin Cities, MN 55111

National Oceanic and Atmospheric Administration
National Geodetic Survey
1315 East-West Highway
Silver Spring, MD 20910-3282

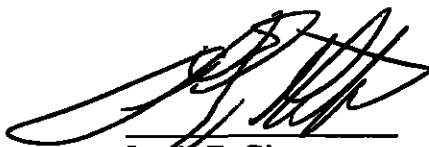
U S National Park Service
Midwest Region
1709 Jackson Street
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Mayor Charles Myers
301 East Main Street
Lowell, MI 49331

Mr James Banks
Chairman
Ionia County Board of Commissioners
602 Sixth Avenue
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Honorable Dan Balice
Mayor, Ionia, Michigan
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Jerry Benz
President, Village of Saranac
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Louis E Gitomer
December 18, 2007

COMBINED ENVIRONMENTAL AND HISTORIC REPORT
(49 C F R 1105.7 and 1105.8)

Docket No. AB-364 (Sub-No. 12X)

**MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT AND IONIA COUNTIES, MI**

Dated: October 22, 2007
Revised: December 18, 2007

ENVIRONMENTAL REPORT

(1) Proposed Action and Alternatives. Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Mid-Michigan Railroad, Inc. ("MMRR") proposes to abandon the 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI (the "Line"). Upon receipt of abandonment authority, MMRR proposes to convert the Line to interim trail use/rail banking under 16 U.S.C. § 1247(d) through the sale or lease of the Line to a third party. MMRR will salvage the track and materials from the Line, but will leave the ties, ballast, bridges and culverts in place for the use of the trail.

Abandonment of the Line will result in the removal of the rail. MMRR does not intend to disturb any sub grade or sub grade structures and does not intend to remove any bridge structures. The operations and maintenance of the line will cease. Removal of the Line will result in the elimination of nine public road crossings and 20 private crossings.

— In 2006 there were two shippers using the Line, Gallagher Farm Service ("Gallagher") and Standard Lumber, both located near Ionia. Gallagher has shipped eight cars in

2004, 11 cars in 2005, 15 cars in 2006, and nine cars through June 2007. Standard Lumber has shipped one car in 2004, two cars in 2005, two cars in 2006, and one car through June 2007

Traffic on this 15.83-mile line has been very light since 2004

There are two alternatives to a full abandonment. One alternative would be for MMRR not to abandon the Line. Limited service has been provided on the Line since 2004. The Line is a stub end track and therefore has no overhead traffic. With little traffic, MMRR has decided to seek abandonment of the Line. The other more likely alternative will be for MMRR to convert the Line to interim trail use/rail banking through the sale or lease of the Line to a third party. MMRR has engaged in negotiations with the third party, which is seeking to acquire the Line for trail use. It would be MMRR's preference to obtain authority to abandon the Line and convert it to interim trail use/rail banking through the sale or lease of the Line to the third party.

A map of the proposed abandonment is attached hereto as Exhibit 1.¹

(2) Transportation System. Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

No passenger traffic will be diverted to other modes as a result of the proposed abandonment. Seventeen carloads were shipped over the Line in 2006 and 10 through June 2007. Hence, it appears that 17 to 20 cars of freight traffic per year would be diverted motor carrier. Accordingly, the proposed abandonment should have no adverse effects on regional or local transportation systems and patterns.

(3) Land Use. (i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies. (ii) Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land. (iii) If the action affects land or water uses within a

¹ The copy of the map that accompanied the information-gathering letter has been removed from that letter. That map was the same as the map in Exhibit 1 accompanying this report.

designated coastal zone, include the coastal zone information required by 1105.9. (iv) If the proposed action is an abandonment, state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. § 10905 and explain why.

(i) MMRR considers the proposed abandonment to be consistent with existing land use plans. Other than in Ionia and Saranac, the land adjoining the Line is mainly rural in character.

MMRR contacted Kent and Ionia Counties, MI and the cities of Lowell, Saranac and Ionia, MI by letters dated October 22, 2007 See Exhibit 2. No response has been received as of this date. A copy of this Environmental Report has been mailed to the appropriate local and state agencies for their information and further comment

(ii) MMRR does not believe that there is any prime agricultural land that will be affected MMRR notified the United States Department of Agriculture ("USDA") Natural Resources Conservation Service (the agency succeeding to the responsibilities of the Soil Conservation Service) of the proposed abandonment by letter dated October 22, 2007, and requested assistance in identifying any potential effects on prime agricultural land See Exhibit 2. No response has been received to date A copy of this report is being supplied to the USDA for its information and further comment.

(iii) The Line does not pass through a designated coastal zone.

(iv) Based on discussions with local groups, MMRR believes that the Line is suitable for interim trail use/ rail banking

(4) Energy (i) Describe the effect of the proposed action on transportation of energy resources (ii) Describe the effect of the proposed action on recyclable commodities. (iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why (iv) If the proposed action will cause diversions from rail to motor carriage of more than. (A) 1,000 rail carloads a year; or (B) an average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show the data and methodology used to arrive at the figure given

(i) The proposed abandonment will have no effect on the transportation of energy resources

(ii) The proposed abandonment will have no effect on the transportation of recyclable commodities.

(iii) The proposed abandonment will have minimal effect on overall energy efficiency since there has been minimal traffic uses the Line

(iv) The proposed abandonment will not cause the diversion more than 1,000 rail carloads a year, or an average of 50 rail carloads per mile per year for any part of the Line of rail traffic to motor carriage.

(5) Air (i) If the proposed action will result in either. (A) An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or (B) an increase in rail yard activity of at least 100 percent (measured by carload activity), or (C) an average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. § 10901 (or § 10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in sub-section (5)(i)(A) will apply. (ii) If the proposed action affects a class I or nonattainment area under the Clean Air Act, and will result in either: (A) an increase in rail traffic of at least 50 percent (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line; (B) an increase in rail yard activity of at least 20 percent (measured by carload activity); or (C) an average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. § 10901 (or 49 U.S.C. § 10505), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply. (iii) If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify the materials and quantity, the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills, and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.

(i) The proposed abandonment will not result in meeting or exceeding the specified thresholds

(ii) The proposed abandonment will not result in meeting or exceeding the specified thresholds

(iii) The proposed abandonment will not affect the transportation of ozone depleting materials.

(6) Noise If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause (i) an incremental increase in noise levels of three decibels Ldn or more; or (ii) an increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.

Not applicable

(7) Safety (i) Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings). (ii) If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials. (iii) If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.

(i) The proposed abandonment will have no detrimental effects on public health and safety. MMRR will cease operating over the Line. As a result of the abandonment, MMRR will remove nine public road crossings and 20 private crossings.

(ii) The proposed abandonment will not affect the transportation of hazardous materials.

(iii) MMRR is not aware of any known hazardous waste sites or sites where there have been known hazardous materials spills on the Line.

(8) Biological Resources. (i) Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects. (ii) State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

(i) MMRR does not believe that the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat. MMRR notified the U.S. Fish and Wildlife Service ("USF&W") of the proposed abandonment by letter dated October 22, 2007, and requested assistance in determining whether the proposed abandonment will adversely affect endangered or threatened species or areas designated as a critical habitat. See Exhibit 2. A copy of this Report was supplied to the USF&W for its information and further comment. By letter dated October 26, 2007, the USF&W stated "[w]e do not have any concerns regarding real estate matters in the abandonments. See Exhibit 5.

(ii) Between Saranac and Ionia, the Line passes through the Ionia State Recreation Area. MMRR does not expect the abandonment to affect the Ionia State Recreation Area since MMRR is planning to cease operations, only remove track and materials, and convert the Line to interim trail use/rail banking.

MMRR is unaware of any other wildlife sanctuaries or refuges, National or State parks or forests that would be adversely affected by the proposed abandonment.

MMRR notified the National Parks Service of the proposed abandonment by letter dated October 22, 2007, and requested assistance in identifying any potential effects on wildlife sanctuaries or refuges, National or State parks or forests. See Exhibit 2. To date, no response to this request has been received. A copy of this Report is being supplied to the National Park Service for its information and comment.

(9) Water. (i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies. (ii) Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act (33 U.S.C. § 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects. (iii) State whether permits under section 402 of the Clean Water Act (33 U.S.C. § 1342) are required for the proposed action.

(i) MMRR is confident that the proposed abandonment will be consistent with applicable water quality standards. MMRR contacted the Michigan Department of Environmental Quality ("MIDEQ") and the United States Environmental Protection Agency ("USEPA") by letters dated October 22, 2007. *See Exhibit 2*. To date, no response to this request has been received. A copy of this Report has been supplied to the MIDEQ and USEPA for their information and comment.

(ii) MMRR believes that no permits under section 404 of the Clean Water Act are required for the proposed abandonment and that no designated wetlands or 100-year flood plains will be affected by the proposed abandonment. MMRR does not plan to salvage any of the ties, ballast, or bridges on the Line so that they can be used when the Line is converted to interim trail use/rail banking. Upon receiving abandonment authority, removal of material will be accomplished by use of the right-of-way for access, along with existing public and private crossings. No new access roads are contemplated. MMRR does not intend to disturb any of the underlying roadbed or perform any activities that would cause sedimentation or erosion of the soil, and do not anticipate any dredging or use of fill in the removal of the track material. Debris will be transported away from the Line and will not be discarded along the right-of-way nor be placed or left in streams or wetlands, or along the banks of such waterways. Also, during track removal, appropriate measures will be implemented to prevent or control spills from fuels, lubricants or any other pollutant materials from entering any waterways. Based upon this course of action, MMRR does not believe a permit under Section 404 of the Clean Water Act will be required.

MMRR contacted the U.S. Army Corps of Engineers by letter dated October 22, 2007 and has received no response to date. *See Exhibit 2*. A copy of this Report has been supplied to the U.S. Army Corps of Engineers for its information and comment.

(iii) MMRR believes that no permit under section 402 of the Clean Water Act would be required for the abandonment. MMRR does not plan to salvage any of the ties, ballast, or bridges on the Line so that they can be used when the Line is converted to interim trail use/rail banking. MMRR contacted the MIDEQ and the USEPA by letter dated October 22, 2007. See Exhibit 2. A copy of this Report has been supplied to the MIDEQ and USEPA for their information and further comment.

(10) Proposed Mitigation Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

MMRR does not expect any adverse environmental impact from the proposed abandonment and, therefore, see no need for any mitigating actions. MMRR will, of course, adhere to any remedial actions suggested by the recipients of this Report, which are required by the Board.

HISTORIC REPORT

1. A U.S.G.S. topographic map (or alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action,

U.S. Geological Survey Maps have been supplied to the Michigan Historic Center ("MIHC"). See Exhibit 3.

2. A written description of the right of way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area;

The 15.83-mile right-of-way is generally 100 feet wide, with some variance in towns and villages.

The Line begins southeast of Lowell at milepost 137.83 at an elevation of about 642 feet, just west of Montcalm Avenue near the intersection with Riverside Drive. The Line travels in an easterly direction south of the Grand River and parallel to Riverside Drive. The Line turns

northeasterly and passes through Saranac, remaining between the Grand River to the north and Riverside Drive to the south of the Line. The Line then passes through the Ionia State Recreation Area.

The Line continues easterly until it turns northeasterly again to cross the Grand River southwest of Ionia. Upon reaching Ionia, the Line turns eastward and passes through the southern part of Ionia before crossing Prairie Creek. The Line ends just east of Prairie Creek at milepost 122.0 at an elevation of about 647 feet.

3. Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area,

Photographs of the bridges on the Line that are 50 years old or older and a detailed description of the bridges are attached as Exhibit 4. MMRR is in the process of entering agreements to convert the Line into interim trail use/rail banking. MMRR expects that the trail user will require MMRR to leave the ties, ballast, and bridges intact for trail use. Therefore, MMRR will not be removing any of the ties, ballast, or bridges on the line. MMRR will only remove the track and materials from the bridges, but will leave the bridges in place for trail use.

4. The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known;

See Exhibit 4.

5. A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action,

The Line was built by the Detroit & Milwaukee Railroad in 1857, which became the Detroit Grand Haven & Milwaukee Railroad (the "DGHM"). The Grand Trunk Western Railroad Company ("GTW") acquired the DGHM in 1882 and merged the assets into GTW in 1928.

GTW sold the Line to Straits Corporation ("SC") in 1986, which became the Central Michigan Railroad Company ("CMR") The Grand Rapids Eastern Railroad Company ("GRE") acquired the Line from CMR in 1993 GRE was controlled by RailTex, Inc In 1999, GRE was merged into MMRR RailTex merged into RailAmerica, Inc. in 2000.

As a result of the abandonment, MMRR proposes to stop railroad operations and convert the Line to interim trail use/rail banking

6 A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic,

MMRR possesses the valuation maps of the Line, but is not aware of any other documentation in its possession.

7. An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 C.F.R. 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities);

MMRR believes that the bridges and structures on the Line are not unusual or noteworthy for inclusion on the National Register of Historic Places It is also MMRR's opinion that there are no archeological resources or other railroad related historic properties in the project area Moreover, since MMRR is agreeable to converting the Line to interim trail use/rail banking, MMRR does not plan to alter, remove or dispose of any of the bridges that are on the Line.

8 A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic waste), and the surrounding terrain.

MMRR believes that there are no existing records as to the nature of any known subsurface ground disturbance or fill, or environmental conditions that might affect the archeological recovery of any potential resources

9. Within 30 days of receipt of the historic report, the State Historic Preservation Officer may request the following additional information regarding specific non railroad owned properties or groups of properties immediately adjacent to the railroad right-of-way: photographs of specified properties that can be readily seen from the railroad right-of-way (or other public rights-of-way adjacent to the property) and a written description of any previously discovered archeological sites, identifying the location and type of the site (*i.e.* prehistoric or native American).

MMRR does not foresee the likelihood that any additional information will need to be supplied in association with the proposed abandonment other than that information previously submitted. But, if any additional information is requested, MMRR will promptly supply the necessary information.

MMRR contacted MIHC *See Exhibit 2* No response has been received. A copy of this Report has been mailed to MIHC.

EXHIBIT 1 – MAP

EXHIBIT 2 – LETTERS

**LAW OFFICES OF
LOUIS E. GITOMER**

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October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

National Oceanic and Atmospheric Administration
National Geodetic Survey
1315 East-West Highway
Silver Spring, MD 20910-3282

RE. Docket No. AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

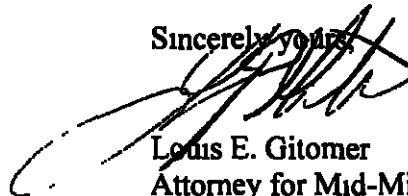
Dear Madam/Sir:

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Attached is a Combined Environmental and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area. We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the STB's environmental review process, please contact the Section of Environmental Analysis (SEA), Surface Transportation Board, 1925 K Street, NW, Washington, DC 20423, telephone 202-245-0295 and refer to the above Docket No. AB-364 (Sub-No. 12X).

Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks. Your comments will be considered by the STB in evaluating the environmental impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Louis E. Gitomer who may be contacted by telephone at 410-296-2250, email at Lou_Gitomer@verizon.net, or mail at Law Offices of Louis E. Gitomer, 600 Baltimore Avenue, Suite 301, Towson, MD 21204.

Sincerely yours,



Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

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U.S. Fish and Wildlife Service
Region 3
One Federal Drive
BHW Federal Building
Fort Snelling
Twin Cities, MN 55111

RE: Docket No AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc -
Abandonment Exemption-in Kent and Ionia Counties, MI*

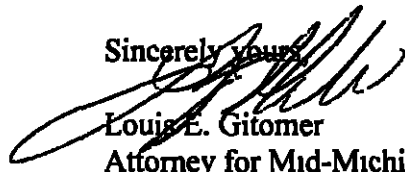
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U.S. Environmental Protection Agency
Region 5
Metcalf Building
Office of Strategic Environmental Analysis
77 West Jackson Boulevard
Mailcode. B-19J
Chicago, IL 60604

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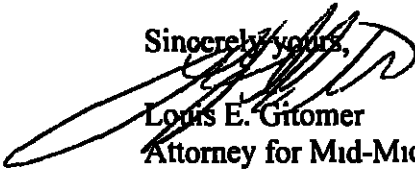
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USDA Natural Resources Conservation Service
3001 Coolidge Street
East Lansing, MI 48823-6350

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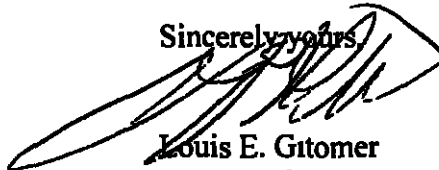
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Detroit District Headquarters
U S Army Corps of Engineers
Detroit District
477 Michigan Ave
Detroit, MI 48226

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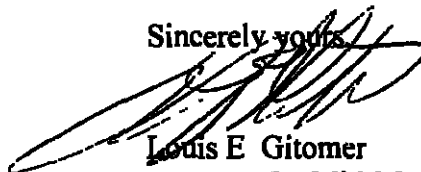
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Sincerely yours,



Louis E Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

**LAW OFFICES OF
LOUIS E. GITOMER**

LOUIS E. GITOMER
LOU_GITOMER@VERIZON.NET

October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Mayor Charles Myers
301 East Main Street
Lowell, MI 49331

RE: Docket No. AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent and Ionia Counties, MI*

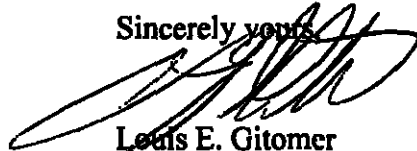
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October 22, 2007

THE ADAMS BUILDING, SUITE 301
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TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Michigan Historic Center
702 West Kalamazoo Street
P.O. Box 30740
Lansing, MI 48909-8240

RE. Docket No. AB-364 (Sub-No 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

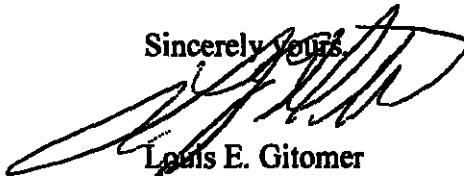
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THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

October 22, 2007

Michigan Department of Environmental Quality
P O. Box 30473-7973
Lansing, MI 48909

RE: Docket No. AB-364 (Sub-No 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

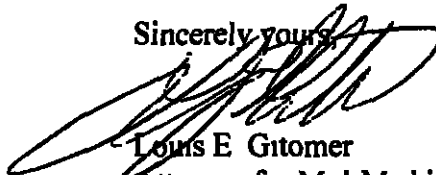
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Attorney for Mid-Michigan Railroad, Inc

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THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

October 22, 2007

Manager, Federal Project Review
Michigan Department of Commerce
Michigan Neighborhood Builders Alliance
P.O. Box 30242
Lansing, MI 48909

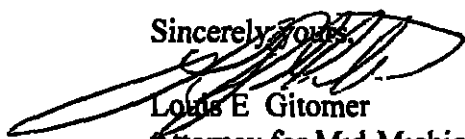
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October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Honorable Daryl J. Delabbio
County Administrator
Kent County
County Administration Building
300 Monroe Avenue, NW
Grand Rapids, MI 49503-2206

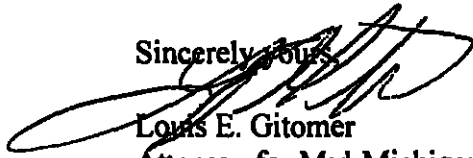
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Abandonment Exemption—in Kent and Ionia Counties, MI*

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October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Jerry Benz
President, Village of Saranac
10 Bridge Street
PO Box 312
Saranac, MI 48881-0312

RE: Docket No. AB-364 (Sub-No 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

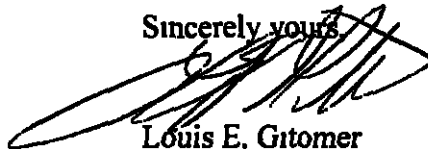
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October 22, 2007

THE ADAMS BUILDING, SUITE 301
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TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Mr James Banks
Chairman
Ionia County Board of Commissioners
602 Sixth Avenue
Lake Odessa, MI 48849

RE Docket No AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

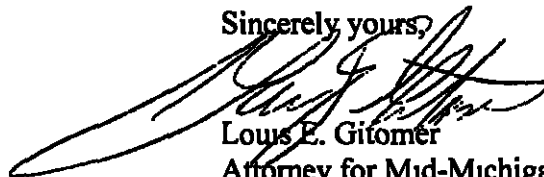
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October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Honorable Dan Balice
Mayor, Ionia, Michigan
114 N Kidd St
Ionia, MI 48846

RE: Docket No. AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

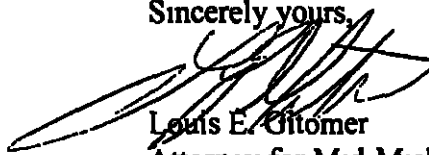
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October 22, 2007

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

U S. National Park Service
Midwest Region
1709 Jackson Street
Omaha, NE 68102

RE Docket No. AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc –
Abandonment Exemption—in Kent and Ionia Counties, MI*

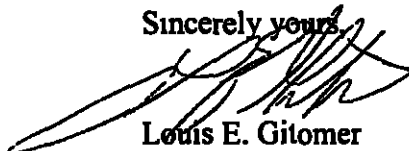
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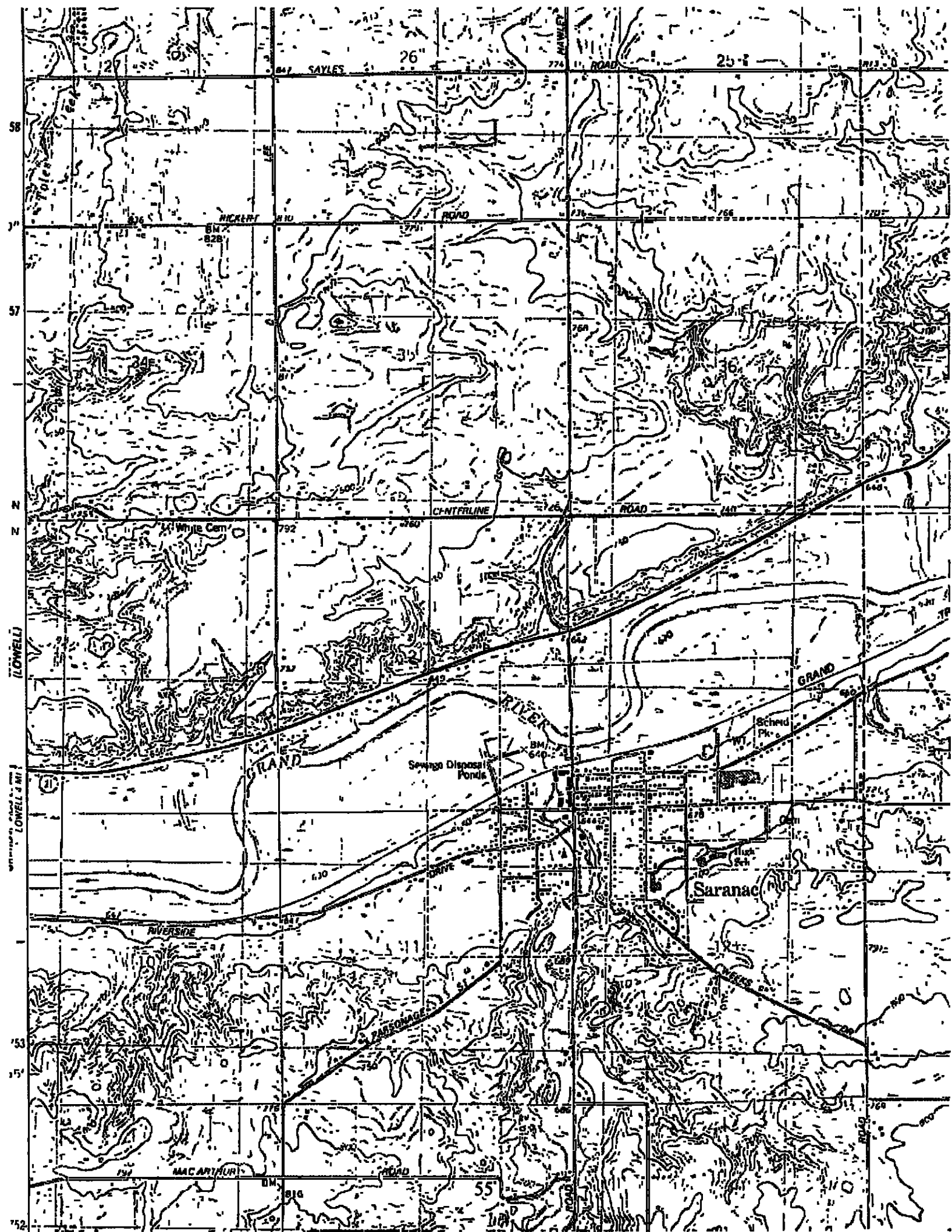
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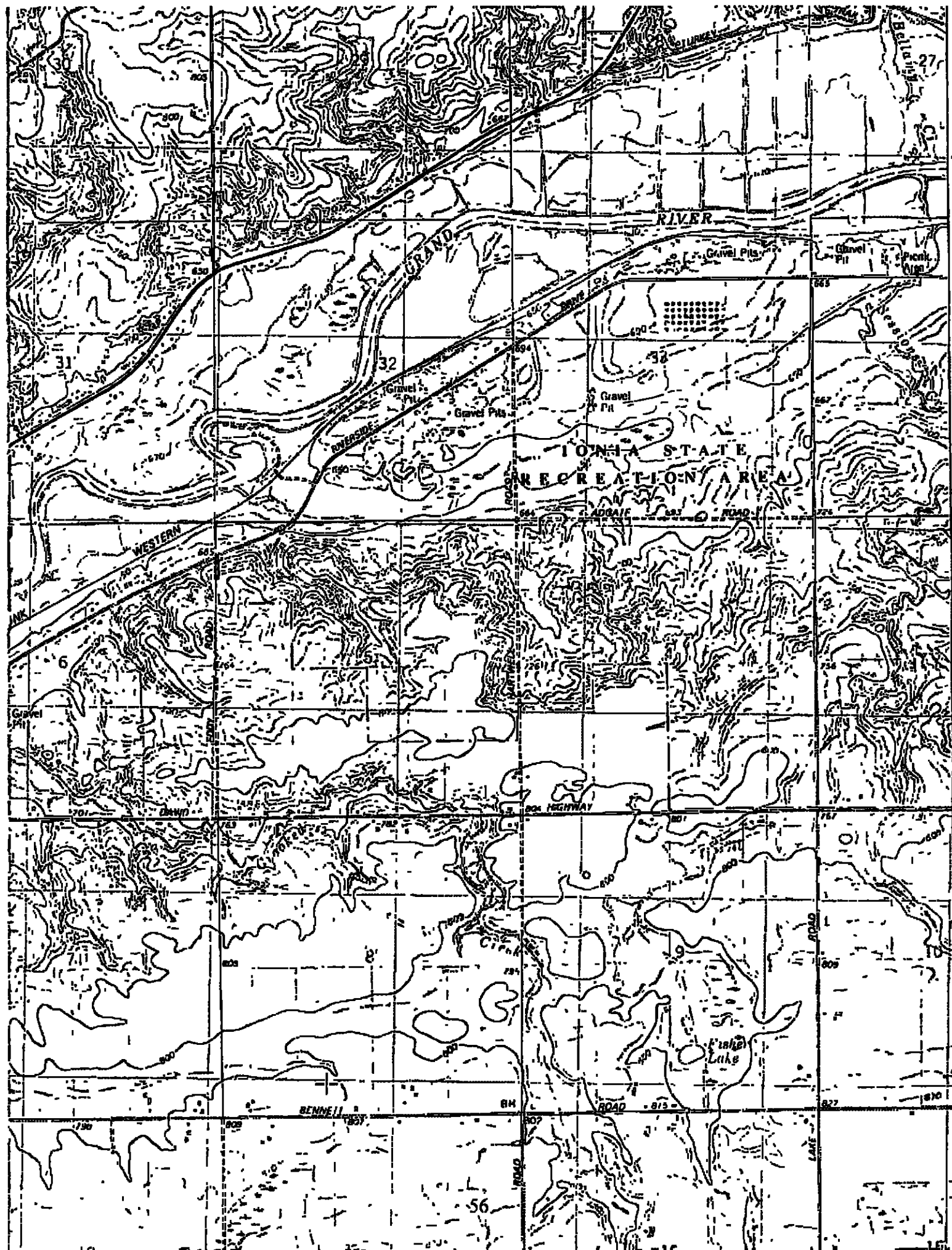


Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

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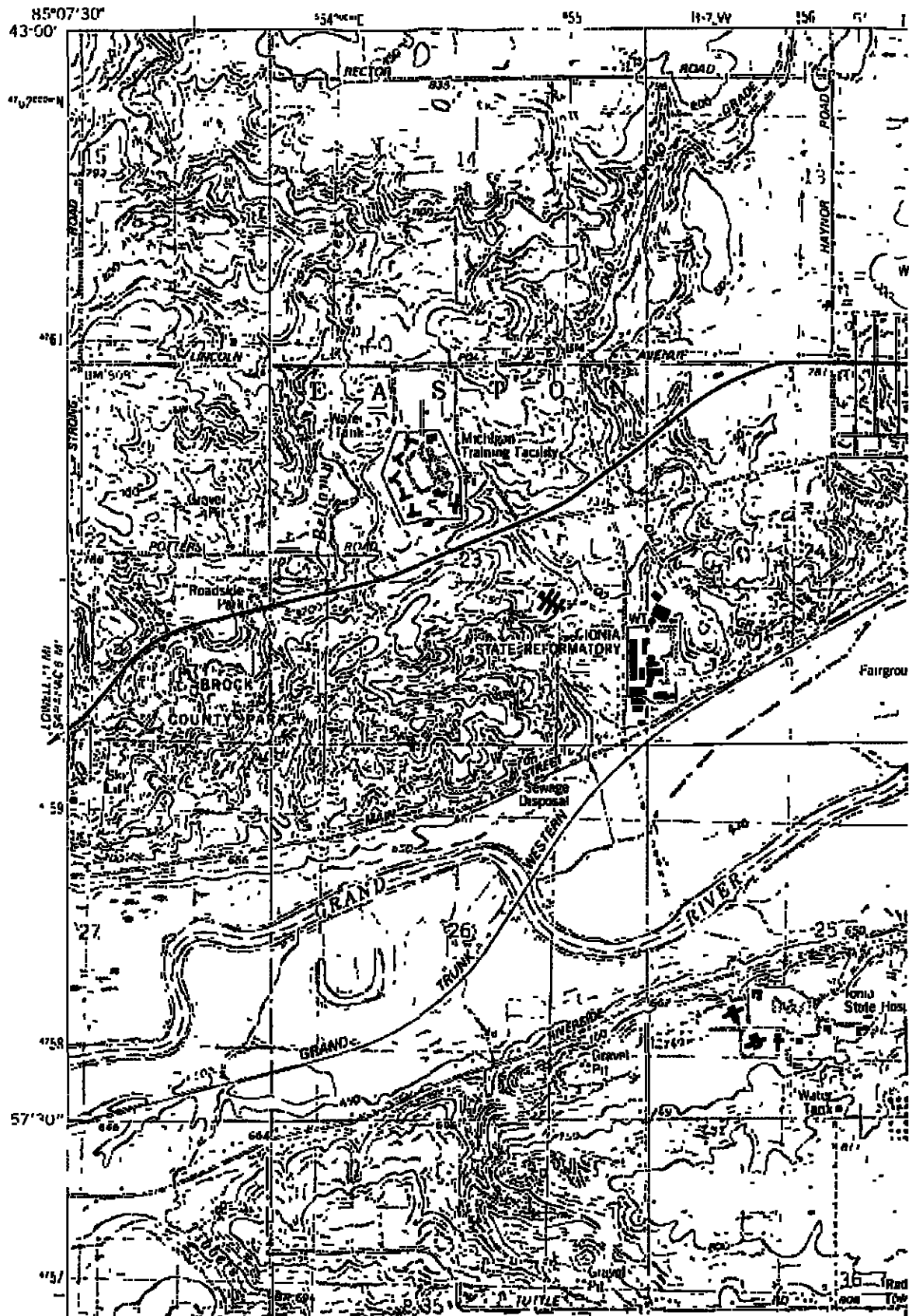
EXHIBIT 3 – USGS MAPS





370 H SW
BEELDING

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



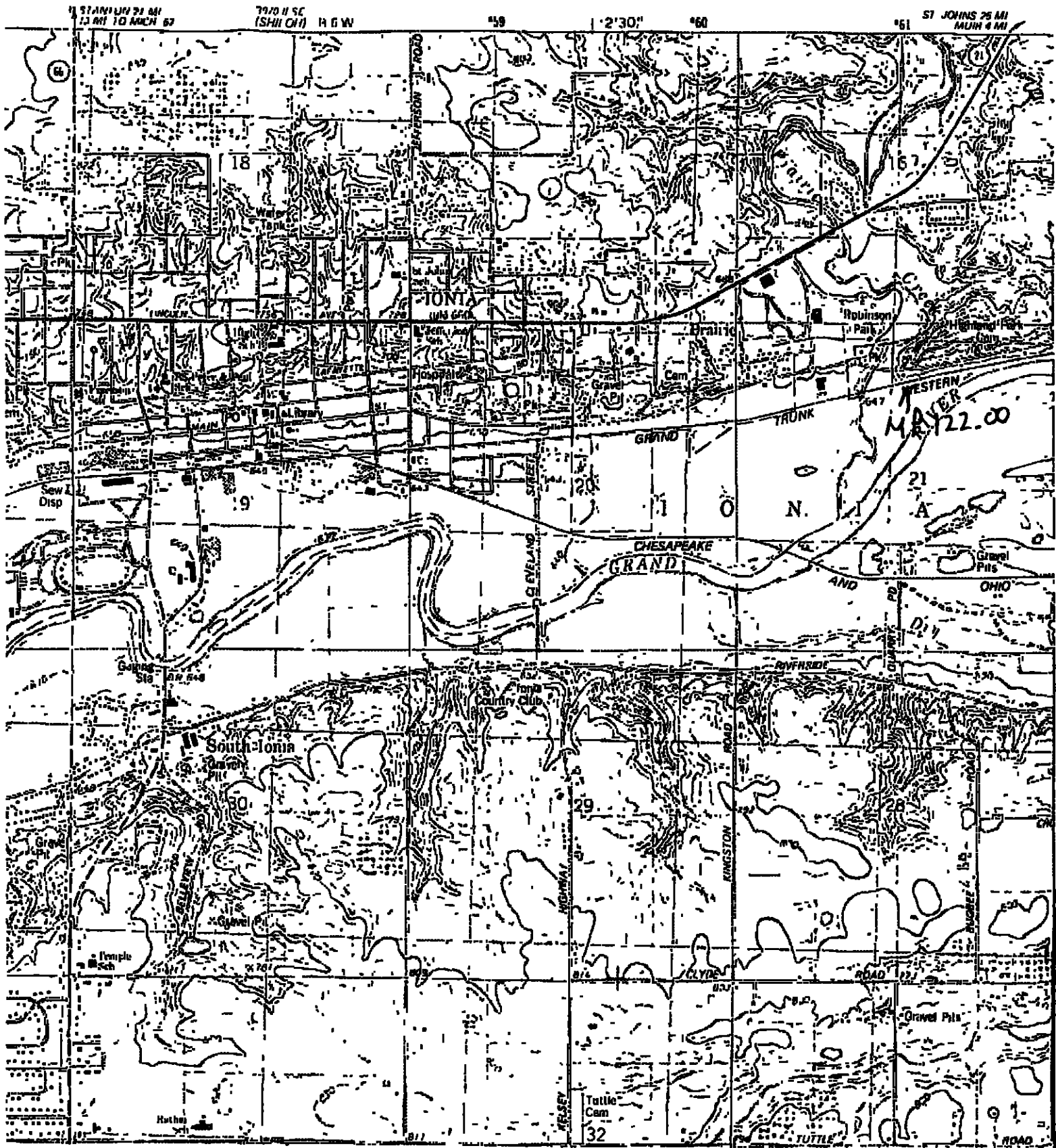


EXHIBIT 4 – BRIDGE PHOTOGRAPHS AND DESCRIPTIONS

**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

May 22, 2006

Structure	PT	Deck Typ	Ballast	Crossing	River
# Spans	13	Length	175	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	1943	Alignment	C		

Greenville 81 10
Flat River

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour Channel/Road Approach	Fair	Stringers	Poor	Bridge Seats/Caps	Bad
	Poor	Floor Beams		Abuts/Backwalls	Poor
	Fair	Girders/Truss/Slab		Piers, Towers, Bents	Poor
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B
Ties	Fair	Bottom Flange		Guard Rail	
Tie Spacers		Web/Diagonals			
Track	Fair	Bearing Stiffeners			
Footwalk		Bracing			
Handrail		Bearings		Overall Rating.	Poor

Photo #	Remarks
---------	---------

Delcan 2006 Notes.

P11-P12 - Bent 11 cap crushing - urgent replacement still required

P10 - Bent 8 - piles 2 and 6 punky - other piles sound OK

Delcan 2005 Notes:

P01 - Approaches low

P06-P09	- Bent 11 - urgent pile cap replacement from last year not yet done - cap crushing
---------	--

- Bent 7 - piles 2 and 3 punky, pile 4 OK

- Bent 8 - piles 2 and 6 punky (piles 4 and 5 seem to be OK)

Delcan 2004 Notes:

P01	- Approaches uneven
-----	---------------------

P03	- Ballast deck ties OK
------------	-------------------------------

P04	- Inspected under traffic - no pumping evident near first approach
-----	--

- Bent 6 - pile 4 hollow, pile 6 OK

- Bent 7 - pile 2 hollow, pile 6 OK

- Bent 8 - piles 2, 4 and 5 are punky near waterline

- Bent 9 - pile 6 punky near waterline

- Bent 10 - pile 4 is punky near waterline

P09	- Bent 11 - pile cap crushed - urgent replacement required
-----	--

P02 - Debris in channel on right

Urgency	Description
---------	-------------

Urgent	Replace pile cap on bent 11 - \$5,000
---------------	--

3 years	Post bent 8 - piles 2 and 6 - \$5,000
----------------	--

5 years Post bents - \$20,000

Banding program for bent 14 pile cap

Greenville 81.60

		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By:	Stan Reimer						
Inspection Date:	May 22, 2006						
Steel Structure (Girders/Beams)							
Structure	DPG	Deck Typ	Open	Crossing	Stream		
# Spans	2	Length	100	Access	< 1/2 mile		
# Tracks	1	Height		Flow Dir	R - L		
Year Built	1910	Alignment	T				
Greenville 81.60 Stream							
General		G/F/P/B	Superstructure		G/F/P/B	Substructure	G/F/P/B
Scour	Fair		Stringers		Bridge Seats/Caps	Fair	
Channel/Road	Fair		Floor Beams	Fair	Abuts/Backwalls	Poor	
Approach	Fair		Girders/Truss/Slab	Fair	Piers, Towers, Bents	Poor	
Deck	G/F/P/B		Top Flange	Fair	Misc	G/F/P/B	
Ties (Open Deck)	Fair		Bottom Flange	Fair	Guard Rail		
Tie Spacers	Fair		Web/Diagonals	Fair			
Track	Fair		Bearing Stiffners	Fair			
Footwalk			Bracing	Fair			
Handrail			Bearngs	Fair	Overall Rating:	Fair	
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes:						
P01	- First approach a bit low this year						
P03	- Open deck - 12 reject ties this year						
P09	- Pier 1 - right side - monitoring cracking - OK for now						
	Delcan 2005 Notes:						
	- Approaches OK						
	- 6/99 reject ties (6%)						
	Delcan 2004 Notes:						
P01	- Approaches a bit low						
P03	- 5/99 reject ties (5%)						
P12,P06	- Pier 1 - crack below right bearing on upmile face only - monitor						
P08	- Abutment 1 - right bearing seat - some cracking at previous repair - monitor						
	UMA 2003 Notes						
	12/99 ties poor Extensive delamination of abutment 1 concrete Backwall is						
	horizontally cracked 1/2" in 2 locations Pier 1 concrete is scaling. Plan on concrete						
	repairs to pier and abutment #1						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
Monitor	Crack on upmileage face of Pier 1						

**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

May 22, 2006

Timber Trestle Structure with Steel Mainspan(s)

Structure	PT/DPG	Deck Typ	Open	Crossing	River
# Spans	7	Length	165	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	
Year Built	1914	Alignment	T		

Greenville 87.4
Flat River

General		Superstructure		Substructure	
	G/F/P/B		G/F/P/B		G/F/P/B
Scour	Fair	Stringers	Poor	Bridge Seats/Caps	Fair
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair
Approach	Fair	Girders/Truss/Slab	Fair	Piers, Towers, Bents	Fair
Deck	G/F/P/B	Top Flange	Fair	Misc	G/F/P/B
Ties (Open Deck)	Poor	Bottom Flange	Fair	Guard Rail	
Tie Spacers	Fair	Web/Diagonals	Fair		
Track	Fair	Bearing Stiffeners	Fair		
Footwalk		Bracing	Fair		
Handrail		Beannags	Fair	Overall Rating	Fair

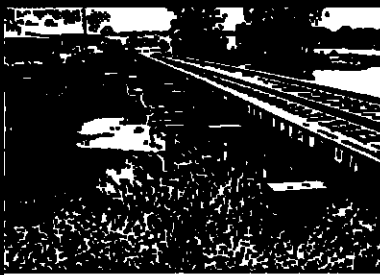
COMMENTS

Photo #	Remarks
	Delcan 2006 Notes:
P12	- Span 7 - stringer 1 rotten and beginning to crush - other stringers OK for now
P05,P06	- Span 1 - stringers 2 and 8 split but OK for now
P03	- Open deck on DPG mainspans - 18 reject ties on mainspans
	Delcan 2005 Notes
	- Approaches OK
	- 18/99 reject ties (18%)
	- Span 1 - stringers 2 and 8 split
	- Span 7 - Stringer 1 rotten
	Delcan 2004 Notes:
P01	- Approaches high
P03	- 17/99 reject ties (17%)
P04	- Ballast deck ties on approach spans poor
P12	- Span 1 - stringer 2 splitting vertically

MAINTENANCE RECOMMENDATIONS

[illegible]

Greenville 88.20

		Bridge Inspection Report Mid-Michigan Railway Greenville Michigan				
		Inspected By: Stan Reimer Inspection Date: May 22, 2006	DELCAN			
Steel Structure (Girders/Beams)						
Structure Steel Trestle # Spans 17 # Tracks 1 Year Built 1918	Deck Type Length Height Alignment	Ballast 225 C	Crossing Access Flow Dir	River Road	Greenville 88.20 Flat River	
General G/F/P/B	Superstructure G/F/P/B	Substructure G/F/P/B				
Scour Fair Channel/Road Approach Fair	Stringers Good Floor Beams Girders/Truss/Slab	Bridge Seats/Caps Fair Abuts/Backwalls Fair Piers, Towers, Bents Fair				
Deck G/F/P/B	Ties (Open Deck) Good Tie Spacers Good Track Good Footwalk Handrail	Top Flange Bottom Flange Web/Diagonals Bearing Stiffeners Bracing Fair Bearings	Misc G/F/P/B Guard Rail			
Overall Rating: Fair						
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes.					
P01-P03	- No change in condition since 2005 - Since major repairs were relatively recent, detailed inspection of piles not yet reqd					
	Delcan 2005 Notes.					
	- No changes since 2004 inspection					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P06	- Steel frame bents installed on cut timber piles - sill plates at varying elevations					
P05,P07	- Bents 4 and 16 not replaced after fire					
P02	- Open deck - all ties are new and in good condition					
	UMA 2003 Notes					
	This bridge was burned down 2 years ago and repaired by steel frame bents and steel stringers New deck All fair No action required					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 89.30

		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By:		Stan Reimer		DELCAN			
Inspection Date:		May 22, 2006					
Timber Trestle Structure with Steel Mainspan(s)							
Structure	PT/Beam	Deck Typ	Open	Crossing	River		
# Spans	17	Length	277	Access	Road		
# Tracks	1	Height		Flow Dir	R - L		
Year Built	?	Alignment	T				
General		G/F/P/B	Superstructure		G/F/P/B	Substructure	G/F/P/B
Scour	Fair		Stringers	Poor		Bridge Seats/Caps	Poor
Channel/Road Approach	Fair		Floor Beams			Abuts/Backwalls	Fair
	Fair		Girders/Truss/Slab			Piers, Towers, Bents	Poor
Deck	G/F/P/B		Top Flange			Misc	G/F/P/B
Ties (Open Deck)	Fair		Bottom Flange			Guard Rail	
Tie Spacers	Fair		Web/Diagonals				
Track	Fair		Bearing Stiffeners				
Footwalk			Bracing				
Handrail			Bearings			Overall Rating:	Poor
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes.						
P08	- Span 1 sinkhole in ballast deck						
P06	- Stringer 1 in span 1 - recently replaced - new stringer width is less						
P11,P12	- Timber sill plates of bents 12 and 13 are on concrete slabs so not as urgent						
	Delcan 2005 Notes.						
P02	- Bent 3 cap replaced						
P03	- Span 1 - stringer 1 replaced						
P12	- Stringer 1 crushing over bent 16 (not bent 18)						
	Delcan 2004 Notes						
P01	- Approaches a bit low						
P03	- 0/28 reject ties (0%) for beam span						
P22,P23	- Ballast deck ties poor						
P04	- Sinkhole through ballast trough floor near bent 2						
P05,P06	- Span 1 - stringer 1 crushing and rotating out at bent 1 - to be replaced						
P09,P10	- Bent 3 pile cap crushing - urgent replacement						
P11	- Most bents are steel pipe piles with concrete pile caps - debris in river on right						
P12	- Stringer 2 from bents 3 to 5 - end rot						
P13	- Bent 5 - timber blocking on concrete caps is rotting						
P14	- Bent 13 - timber sill plate rotten and to be replaced						
P15	- Bent 14 - timber sill plate rotten and to be replaced						
P16,P17	- Bent 14 - pile cap starting to rot, post 4 is rotten and hollow						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
1 year	Replace stringer 1 over bent 16 - \$5,000						
3 years	Replace sill plates for bents 13 and 14 - \$10,000						
3 years	Replace pile caps for bents 1, 14 and 15 - \$15,000						

Greenville 89.31

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
O/H Highway Structure						
Structure	OH Via	Deck Typ	-	Crossing	Hwy	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour Channel/Road Approach		Fair	Stringers			
		Good	Floor Beams			
		Fair	Girders/Truss/Slab		Good	
Deck		G/F/P/B	Top Flange			
Ties (Open Deck)			Bottom Flange			
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffners			
Footwalk		Good	Bracing			
Handrail			Bearngs			
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes - No change in condition since 2004					
	Delcan 2004 Notes: - Concrete deck on steel girders					
P01	UMA 2003 Notes: - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					

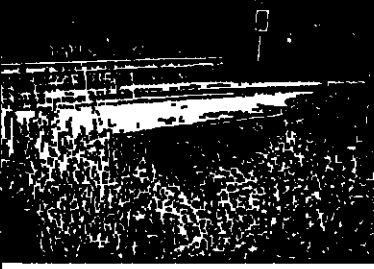
Greenville 91.60

		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By.	Stan Reimer		DELCAN				
Inspection Date	May 22, 2006						
Timber Trestle Structure							
Structure	PT	Deck Typ	Ballast	Crossing	Stream		
# Spans	6	Length	82	Access	Road		
# Tracks	1	Height		Flow Dir	R - L		
Year Built	?	Alignment	T				
Greenville 91.60 Stream							
General		G/F/P/B	Superstructure		G/F/P/B		
Scour Channel/Road Approach	Fair	Strngers	Fair	Bridge Seats/Caps	Poor		
	Fair		Floor Beams		Fair	Abuts/Backwalls	Fair
	Fair		Girders/Truss/Slab			Piers, Towers, Bents	Bad
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B		
Ties	Fair	Bottom Flange		Guard Rail			
Tie Spacers		Web/Diagonals					
Track	Fair	Bearing Stiffners					
Footwalk		Bracing		Fair			
Handrail		Bearings					
Overall Rating							
Fair							
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes.						
	- this bridge has urgent work that has not been done						
P04	- Bent 1 - stumps 1 and 5 are rotten						
P05	- Bent 2 - piles 3 and 4 are posted, piles 1, 5 and 6 are rotten - urgent repair reqd						
P08	- Bent 4 - piles 1, 2, 3 and 6 are reject - needs framing too						
P09,P10	- Bent 7 pile cap is rotten on left						
	Delcan 2005 Notes:						
P03	- Bent 1 - stump 4 is rotten						
P04	- Bent 2 - piles 1, 2, 5 and 6 are rotten - frame bent now						
P07	- Bent 5 - pile 1 is gone, piles 2, 3 and 4 are punky						
P09-P10	- Bent 7 - pile cap rotten						
	Delcan 2004 Notes:						
P01	- Approaches OK						
	- Ballast deck ties OK						
P06	- Bent 2 - piles 1, 2 and 5 are hollow, piles 3 and 4 are posted						
P07	- Bent 3 - Pile 4 completely hollow						
P08,P10	- Bent 4 - pile 3 is rotten near waterline, pile 2 is punky						
P11	- Bent 5 - pile 1 is crushed, others sound punky - frame within 1 year						
P16,P18	- Bent 6 - pile cap split and to be banded, post 1 split and to be banded						
P15	- Bent 7 - pile cap is split on right						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
Urgent	Frame bents 2, 4 and 5 - \$30,000						
1 year	Post bent 3 - pile 4, bent 4 - pile 3 - \$10,000						
1 year	Replace bent 7 pile cap - \$5,000						
	Banding Program - Bent 6 - cap and post 1						
	Consider replacement with culvert for \$35,000						

Greenville 91.70

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Culvert						
Structure	8' x 12' RC	Deck Typ	-	Crossing	Stream	
# Spans	1	Length	13	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
Greenville 91 70 Culvert						
General		Superstructure		Substructure		
Scour		Stringers		Bridge Seats/Caps		
Channel/Road		Floor Beams		Abuts/Backwalls		
Approach		Girders/Truss/Slab		Piers, Towers, Bents		
Deck		Top Flange		Misc		
Ties (Open Deck)		Bottom Flange		Guard Rail		
Tie Spacers		Web/Diagonals				
Track		Bearing Stiffeners				
Footwalk		Bracing				
Handrail		Bearings		Overall Rating		
				Fair		
COMMENTS						
Photo #	Remarks					
P01-P04	Delcan 2006 Notes: - No change in condition since 2005					
P01	Delcan 2005 Notes. - No change in condition since 2004					
P06	Delcan 2004 Notes. - Approaches OK - Good condition but overgrown					
	UMA 2003 Notes - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 94.70

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Steel Structure (Girders/Beams)						
Structure	on Bridge	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
Greenville 94 70 Road Bridge						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour			Stringers		Bridge Seats/Caps	
Channel/Road			Floor Beams		Abuts/Backwalls	
Approach			Girders/Truss/Slab		Piers, Towers, Bents	
Deck		G/F/P/B	Top Flange		Misc	
Ties (Open Deck)			Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffners			
Footwalk			Bracing			
Handrail			Bearngs			
Overall Rating.					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P03	- Timber bearing blocks for rail stringers are rotting at ends - OK for now					
	Delcan 2005 Notes:					
	- No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- This is a road bridge adjacent to and crossing the tracks					
P04	- Superstructure is steel rails on top of timber abutments, timber deck					
	- Consider closing this bridge or turning it over to road agency					
	- Otherwise, consider replacing with a culvert when bridge starts to fail					
P01	- Bridge is posted for 15 tons					
	UMA 2003 Notes:					
	- Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 95.50

		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By: Stan Reimer		Inspection Date: May 22, 2006		DELCAN			
Timber Trestle Structure							
Structure	PT	Deck Typ	Ballast	Crossing	Stream		
# Spans	1	Length	13	Access	< 1/2 mile		
# Tracks	1	Height		Flow Dir	R - L		
Year Built	1929	Alignment	T				
Greenville 95 50 Cattle Pass							
General		G/F/P/B	Superstructure		G/F/P/B		Substructure
Scour Channel/Road Approach		Fair	Stringers		Poor	Bridge Seats/Caps	Fair
		Fair	Floor Beams			Abuts/Backwalls	Fair
		Fair	Girders/Truss/Slab			Piers, Towers, Bents	Poor
Deck		G/F/P/B	Top Flange			Misc	G/F/P/B
Ties		Fair	Bottom Flange			Guard Rail	
Tie Spacers			Web/Diagonals				
Track		Fair	Bearing Stiffeners				
Footwalk			Bracing				
Handrail			Bearings			Overall Rating: Poor	
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes						
P05	- Stringer 5 rotten at bent 1						
P06	- Bent 1 cap rotten on left						
	- Bent 1 piles 2 and 4 are rotten, pile 3 is posted						
	Delcan 2005 Notes						
P08	- Stringer 5 is rotten						
P03-P04	- Bent 1 pile cap rotten						
P05	- Bent 1 - piles 2 and 4 are hollow						
	Delcan 2004 Notes						
P01	- Approaches OK						
P03	- Ballast deck ties OK						
P06	- Bent 1 - piles 2 and 4 hollow						
P04,P07	- Bent 1 cap starting to rot on left						
	UMA 2003 Notes:						
	Bent 2 was replaced with a frame bent Bent 1 cap 1 is rotted on left side 9-8x16 stringers. Piles 2 & 4 are hollow at top. Pile 3 is posted. Bent 1 needs to be framed within 3 years						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
3 years	Frame bent 1 - \$10,000						
5 years	Replace Stringers \$10,000						

**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

May 22, 2006

Structure	6' x 8' RCB	Deck Typ	-	Crossing	Stream
# Spans	0	Length	0	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	?	Alignment	C		

Greenville 98.00
Culvert

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour	Fair	Stringers		Bridge Seats/Caps	
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair
Approach	Fair	Girders/Truss/Slab	Fair	Piers, Towers, Bents	
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B
Ties (Open Deck)		Bottom Flange		Guard Rail	
Tie Spacers		Web/Diagonals			
Track	Fair	Bearing Stiffeners			
Footwalk		Bracing			
Handrail		Bearings		Overall Rating:	Fair

Photo #	Remarks
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P01-P04	- No change in condition since 2005
	- Overgrown with brush

- No change in condition since 2004

P01	- Approaches OK
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P02	- Some spalling in headwall of outlet on left
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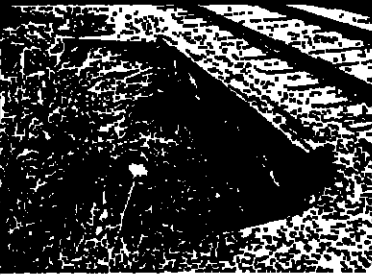
UMA 2003 Notes

- Not inspected

Urgency	Description
---------	-------------

No action necessary

Greenville 99.50

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By.		Stan Reimer				
Inspection Date		May 22, 2006				
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	1	Length	13	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1929	Alignment	T			
Greenville 99.50 Cattle Pass						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair		Stringers	Fair	Bridge Seats/Caps	
Channel/Road	Fair		Floor Beams		Abuts/Backwalls	
Approach	Fair		Girders/Truss/Slab		Piers, Towers, Bents	
Deck		G/F/P/B	Top Flange		Misc	
Ties	Fair		Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track	Fair		Bearing Stiffners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating						
Fair						
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes					
P01-P05	- No change in condition since 2005					
	Delcan 2005 Notes					
	- No change in condition since 2004					
	Delcan 2004 Notes					
P01	- Approaches OK					
P03	- Ballast deck ties OK					
P06	- Bent 2 - pile 3 split and to be banded					
	UMA 2003 Notes.					
	9-8x16 stringers Bent 2 pile 1 needs to be on plan to post Both caps are fair.					
	Ballast curbs are tipping.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	Banding program - bent 2, pile 3					

Greenville 99.60

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By: Stan Reimer		DELCAN				
Inspection Date: May 22, 2006						
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	1	Length	13	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1929/50	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers		Poor	
Channel/Road		Fair	Floor Beams			
Approach		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange			
Ties		Fair	Bottom Flange			
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
					Overall Rating	
					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P04,P06	- Stringer 1 is hollow and stringer 9 sounds punky - other stringers are OK					
P05	- Bent 1 - piles 1, 2, 4 and 5 are hollow and/or rotten - needs framing					
	Delcan 2005 Notes:					
P05,P06	- Stringer 1 and 9 are rotten					
P04	- Bent 2 - piles 1, 2, 4 and 5 are hollow					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P02	- Ballast deck ties OK					
P04	- Bent 2 - pile 5 hollow					
P05	- Bent 1 - pile 4 punky					
P06,P07	- Stringers discolored, stringer 9 starting to rot					
	UMA 2003 Notes					
	Bent 1 pile 4 is hollow Bent 2 pile 1 is bad; 2, 4 & 5 are hollow; 3 is fair; 6 is solid.					
	Stringer 9 is hollow. Bent 2 needs to be framed within 1 year.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Frame bent 2 - \$10,000					
3 years	Replace 2 stringers - \$10,000					

[illegible]

Greenville 99.90

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By: Stan Reimer		Inspection Date: May 22, 2006		DELCAN		
Culvert						
Structure # Spans # Tracks Year Built	CMP 0 1 ?	Deck Typ Length Height Alignment	- 0 T	Crossing Access Flow Dir	Stream Road R - L	
Greenville 99 90 Culvert						
General G/F/P/B		Superstructure G/F/P/B		Substructure G/F/P/B		
Scour Channel/Road Approach		Stringers Floor Beams Girders/Truss/Slab		Bridge Seats/Caps Abuts/Backwalls Piers, Towers, Bents		
Deck G/F/P/B		Top Flange Bottom Flange Web/Diagonals Bearing Stiffeners Bracing Bearings		Misc Guard Rail		
Ties (Open Deck) Tie Spacers Track Footwalk Handrail				Overall Rating: Fair		
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: - Approaches OK - Pipe culvert					
P01	UMA 2003 Notes: - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 103.00

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer	DELCAN				
Inspection Date	May 22, 2006					
Culvert						
Structure	CMP	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	L - R	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair	Stringers		Bridge Seats/Caps		
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair	
Approach	Fair	Girders/Truss/Slab	Fair	Piers, Towers, Bents		
Deck		G/F/P/B	Substructure		G/F/P/B	
Ties (Open Deck)		Top Flange		Misc	G/F/P/B	
Tie Spacers		Bottom Flange		Guard Rail		
Track	Fair	Web/Diagonals				
Footwalk		Bearing Stiffeners				
Handrail		Bracing				
		Bearngs		Overall Rating	Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P01-P04	- No change in condition since 2005					
	Delcan 2005 Notes.					
	- No change in condition since 2004					
	Delcan 2004 Notes.					
P01	- Approaches OK					
	- Twin pipes					
	UMA 2003 Notes:					
	- Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

EXHIBIT 5 – RESPONSES



IN REPLY REFER TO

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bishop Henry Whipple Federal Building
1 Federal Drive
Fort Snelling, MN 55111-4056

FWS/NWRS-RE - General
Railroad Abandonments

October 26, 2007

Surface Transportation Board
Section of Environmental Analysis (SEA)
1925 K Street, NW
Washington, D C 20423

Dear Sir/Madam

Thank you for the opportunity to comment on the proposed abandonment of service on 15 83 miles of railroad line between MP 137.83 and MP 122 00, located in Kent and Ionia Counties, Michigan, STB Docket No AB-364 (Sub-No 12X)

We have researched our ownerships in the vicinity and have determined we do not own any land or interests in land in the vicinity of the proposed rail line abandonments We do not have any concerns regarding real estate matters in the abandonments

Sincerely,

/s/ Patrick G. Carroll

Patrick G Carroll
Senior Realty Officer
Division of Realty

cc Louis E Gitomer, Law Offices of Louis E Gitomer

EXHIBIT C—FEDERAL REGISTER NOTICE

.

**MID-MICHIGAN RAILROAD, INC –ABANDONMENT EXEMPTION–
IN KENT AND IONIA COUNTIES, MI**

Notice of Petition for Exemption to Abandonment

On December 18, 2007 Mid-Michigan Railroad, Inc. ("MMRR") filed with the Surface Transportation Board, Washington, D C 20423, a petition for exemption for the abandonment of a 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI, all of which traverses through United States Postal Service ZIP Codes 48846, 48881, and 49331 (the "Line"). The Line for which the abandonment exemption request was filed includes the stations of Lowell, Saranac, and Ionia.

The Line does not contain federally granted rights-of-way Any documentation in the railroad's possession will be made available promptly to those requesting it

The interest of railroad employees of MMRR will be protected by *Oregon Short Line R Co —Abandonment—Goshen*, 360 I C.C 91 (1979).

MMRR has requested the Board to grant an exemption from the offer of financial assistance process. If the exemption is not granted, any offer of financial assistance will be due no later than 10 days after service of a decision granting the petition for exemption. All interested persons should be aware that following abandonment of rail service and salvage of the line, the line may be suitable for other public use, including interim trail use.

Any request for a public use condition and any request for trail use/rail banking will be due no later than 20 days after notice of the filing of the petition for exemption is published in the Federal Register.

MMRR has proposed, and we are adopting the following procedural schedule for this proceeding

December 18, 2007—Petition for Exemption filed

January 7, 2008—Due date for Notice of Petition to be published in the *Federal Register*.

February 1, 2008—Due date for protests and comments, including opposition case in chief, and for public use and trail use requests.

February 15, 2008—Due date for MMRR's reply to opposition case and for MMRR's response to trail use requests

April 3, 2008—Due date for service of decision on the merits

April 11, 2008—Due date for offers of financial assistance, unless exempted by the Board.

Persons seeking further information concerning abandonment procedures may contact the Surface Transportation Board or refer to the full abandonment or discontinuance regulations at 49 CFR Part 1152. Questions concerning environmental issues may be directed to the Board's Section of Environmental Analysis. An environmental assessment (EA) (or environmental impact statement (EIS), if necessary) prepared by the Section of Environmental Analysis will be served upon all parties of record and upon any agencies or other persons who commented during its preparation. Any other persons who would like to obtain a copy of the EA (or EIS) may contact the Section of Environmental Analysis. EAs in these abandonment proceedings normally will be made available within 60 days of the filing of the petition. The deadline for submission of comments on the EA will generally be within 30 days of its service

EXHIBIT D—NEWSPAPER CERTIFICATION

CERTIFICATE OF PUBLICATION

The undersigned hereby certifies that notice of the proposed abandonment in Docket No AB-364 (Sub-No 12X) was advertised on November 12, 2007 in the Grand Rapids Press, a newspaper of general circulation in Kent and Ionia Counties, MI, as required by 49 C.F.R. § 1105.12.

A handwritten signature in black ink, appearing to read "Louis E. Gitomer", is written over a horizontal line.

Louis E Gitomer
December 18, 2007

THE GRAND RAPIDS PRESS

Be someone who gets it.

STATE OF MICHIGAN,
COUNTY OF KENT } SS.

The Advertising Director of THE GRAND RAPIDS, PRESS, a newspaper published in the County of Kent, and circulated throughout West Michigan, being duly sworn, deposes and says that the following advertising was inserted.

November 12, 2007

Sten S. Westphal

Advertising Director

Sworn and subscribed before me this 12th day of

November A.D. 2007

Monika R. Dauksts-Strautnieks

NOTARY PUBLIC, KENT COUNTY, MI

My commission expires:

MONIKA R. DAUKSTS-STRAUTNIEKS
Notary Public, State of Michigan
County of Kent
My Commission Expires July 27, 2012
Acting in the County of Kent

Mid-Michigan Railroad Inc. (MMRI) gives notice that on or about November 13, 2007 it intends to file with the Surface Transportation Board, Washington, DC 20423, a petition for exemption under 49 U.S.C. 10505 from the prior approval requirements of 49 U.S.C. 10903 et seq. permitting the abandonment of a 1.583 mile rail line between milepost 137.83 southeast of Lowell and milepost 122.00 east of Prairie Center at the end of the line, which traverses through United States Postal Service ZIP Codes 48846, 48881, and 49331 in Kent and Ionia Counties, MI (the "Line"). The proceeding has been docketed as No. RA 06-364 (Sub No. 120). The Board's Section of Environmental Analysis (SEA) will generally prepare an Environmental Assessment (EA), which will normally be available 60 days after the filing of the petition for discontinuance of service exemption. Comments on environmental and energy matters should be filed no later than 30 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to SEA, Surface Transportation Board, Washington, DC 20423 or by calling SEA at 202-245-0295. Appropriate action of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions public use conditions or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails, use, public use, and others of financial assistance) must be filed directly with the Board's Office of the Secretary, 395 E Street SW, Washington, DC 20423 (See 49 CFR 1104.1(a) and 1104.3(a)) and one copy must be served on applicants/receivers (See 49 CFR 1104.2(a)). Questions regarding other of financial assistance public use conditions may be directed to the Board's Office of Congressional and Public Services at 202-245-0233. Copies of any comments or requests for conditions should be served on the applicant(s) representative (Louis E. Grimmer, Law Offices of Louis E. Grimmer, 600, Bohannon Avenue, Suite 301, Tallon, MD 21204, (410) 256-2250, or Law Offices of Grimmer, 21204).

EXHIBIT E—CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

Pursuant to 49 C.F.R. §1152.60(d), the undersigned hereby certifies that the Petition for Exemption in Docket No. AB-364 (Sub-No. 12X), *Mid-Michigan Railroad, Inc –Abandonment Exemption—in Kent and Ionia Counties, MI* was mailed via first class mail, postage prepaid, on December 18, 2007, to the following parties

State Public Service Commission

Michigan Department of Transportation
P O Box 30050
Lansing, MI 48909

Public Service Commission
6545 Mercantile Way, Suite 7
Lansing, MI 48909

Military Surface Deployment and Distribution Command Transportation Engineering Agency

SDDCTEA
ATTN Railroads for National Defense
720 Thimble Shoals Blvd.
Suite 130
Newport News, VA 23606-2574

National Park Service

U S Department of Interior
National Park Service
Land Resources Division
1201 Eye Street, N W
Washington, DC 20005

Ms Cherri Espersen
National Recreation Trail Coordinator
Rivers, Trails and Conservation Assistance Program National Park Service
1849 C Street, NW (Org Code 2240)
Washington, DC 20240-0001

U.S. Department of Agriculture

U S Department of Agriculture
Chief of the Forest Service
4th Floor, NW
Sidney R. Yates Building
201 14th Street, S W
Washington, DC 20250



Louis E. Gitomer
December 18, 2007

**EXHIBIT F-MARK D. GARVIN VERIFIED
STATEMENT**

**MID-MICHIGAN RAILROAD, INC –ABANDONMENT EXEMPTION–
IN KENT AND IONIA COUNTIES, MI**

VERIFIED STATEMENT OF MARK D GARVIN

My name is Mark D. Garvin and I am Chief Engineer of RailAmerica, Inc (“RailAmerica”), a shortline holding company that controls Mid-Michigan Railroad, Inc. (“MMRR”) I have a B S in Civil Engineering from Michigan Technological University My engineering work in the railroad industry began over 25 years ago on Conrail as a management trainee I soon became an assistant track supervisor in charge of track maintenance I joined Grand Trunk Western Railroad Company as a track supervisor, in charge of system track gangs performing capital projects. I joined RailAmerica as a Project Manager and became Chief Engineer in January 1997 My current duties include the acquisition of track equipment and material, the selection and training of maintenance of way personnel, the engineering evaluation of potential acquisition properties, and the development of maintenance and rehabilitation plans for properties acquired by RailAmerica

I am familiar with the 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center Rd., milepost 122.00, the end of the line, in Kent and Ionia Counties, MI (the “Line”)

I will discuss the value of the track and materials on the Line, the cost of rehabilitation of the Line, and the annual maintenance-of-way costs once the Line is rehabilitated.

1. Value of Track and Materials. Each of RailAmerica's subsidiary railroads maintain an inventory of track and materials on its lines under my supervision as Chief Engineer. In addition, each railroad conducts regular inspections of its lines to maintain the accuracy of the inventory and the condition of the inventory. Attached as the Exhibit to this verified statement is the list of inventory on the Line

The inventory includes rail, other track material ("OTM"), ties, signals and turnouts. The rail, OTM, and turnouts are classified as relay, reroll, or scrap. The valuations are based on recent quotations obtained by MMRR and RailAmerica from rail suppliers and quotations in national publications. Liquidation costs are based on my experience with the cost of removal and transportation and recent quotations received by MMRR and RailAmerica for removal and transportation

Although the Appendix values ties, I have been told that the trail user has indicated a desire to retain the ties. This is a benefit of \$5,622 to MMRR since it will cost more to remove and transport the ties (\$208,014), than their value (\$202,392). Therefore, the net liquidation value of the railroad asset will be \$1,783,045.

2. Rehabilitation. It is my judgment based on my long experience in the railroad industry that \$331,000 in capital expenditures is required to rehabilitate the Line so that it will remain Federal Railroad Administration Class 1 condition. There is one bridge on the Line that crosses the Grand River. The bridge will require \$275,000 in repairs to keep it in operating condition. In addition, the road crossings on the Line will require rehabilitation of \$56,000.

3. Maintenance-of-way. I have reviewed with the four Field Chief Engineers for the RailAmerica railroads the recent costs per mile adopted by the Surface

Transportation Board for Class III railroads for maintenance of way costs. Those costs range between \$4,500 and \$6,000 per mile. Based on consultation and experience, I believe use of \$5,000 per mile is conservative. The reason that I believe such cost is valid is based on the identified costs to be incurred in the annual maintenance of the Line of \$69,000, which consists of brush cutting costs of \$34,000, \$35,000 to replace ties and resurface rail, and other expenditures. There will be other costs incurred in maintaining the Line. On this 15.83-mile line, the average per mile cost of identified maintenance would be about \$4,350. Therefore, in my professional judgment and based on my experience, I feel very confident using an average maintenance of way cost of \$5,000 per mile or \$79,150 for the Line.

VERIFICATION

I, Mark D. Garvin, verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement

Executed on December 6, 2007


Mark D Garvin

EXHIBIT

.

Liquidation Value of Railroad Asset
MMRR - Grand Rapids Sub - MP 122 - MP 137.83

November 14, 2007

Rail										
Weight	Jnt./CWR	Miles	NT/Mile	Total NT	Total GT	Class	Price NT	Price GT	Total \$ NT	Total \$ GT
100lb	Jnt	15.36	167.20	2568.19	2293.03	Relay	\$650		\$1,669,325	
100lb	Jnt	1.13	167.20	188.94	168.69	Reroll		\$335		\$56,512
100lb	Jnt	2.25	161.92	364.32	325.29	Scrap		\$240		\$78,069
Totals		18.74		3121.45	2787.01	Total Rail Value			\$1,803,905	

OTM										
Weight	Jnt./CWR	Miles	NT/Mile	Total NT	Total GT	Class	Price NT	Price GT	Total \$ NT	Total \$ GT
100lb	Jnt	16.49	55.3	911.90	814.19	Relay	\$350		\$319,164	
100lb	Jnt	2.25	55.3	124.43	111.09	Scrap		\$285		\$31,662
Totals		18.74		1036.32	925.29	Total OTM Value			\$350,826	

Ties (Removal & Market)						Signal/Appliances			
Class	%	Miles	Total Ties	Price Ea.	Total	Type	Quantity	Unit Price	Total
#1 Relay	25%	18.7	14055	\$8	\$112,440	Lights	4	\$2,500	\$10,000
#2 Relay	10%	18.7	5622	\$6	\$33,732	Gates			
Landscape	25%	18.7	14055	\$4	\$56,220	Total all Signals			
Scrap	35%	18.7	19677	\$0					\$10,000
Total Tie Value					\$202,392				

Turnouts										
Weight	Type	Qty.	NT/TO	Total NT	Total GT	Class	Price EA	Price GT	Total \$ Each	Total \$ GT
100lb	No 10	6	4.45	26.70	23.84	scrap		\$265		\$6,317
115lb	No 10	1	4.52	4.52	4.04	relay	\$8,000		\$8,000	
Totals		7		31.22	27.88	Total OTM Value			\$14,317	

Liquidation Costs				
	Unit	Cost	Quantity	Total
Dismantle Track (CWR)	NT	\$65		
Dismantle Trk (Jointed)	NT	\$50	4158 NT	\$207,888.5
Transport Rail & OTM	NT	\$35	4189 NT	\$146,614.7
Remove Ties	EA	\$2	53,409	\$106,818.0
Transport Ties	EA	\$3	33,732	\$101,196.0
Remove Relay Turnouts	EA	\$2,500	7	\$17,500.0
Remove Crossing Signal	EA	\$1,500	4	\$6,000.0
Restore Crossings	EA	\$2,000	9	\$18,000.0

Gross Liquidation Value	\$2,381,441
Total Liquidation Costs	\$604,017
Net Liquidation Value	\$1,777,423

**EXHIBIT G—ROBERT M. FRELICH, JR. VERIFIED
STATEMENT**

**MID-MICHIGAN RAILROAD, INC.-ABANDONMENT EXEMPTION-
IN KENT AND IONIA COUNTIES, MI**

VERIFIED STATEMENT OF ROBERT M. FRELICH, JR.

My name is Robert M. Frellich, Jr. and I am Director of Finance of RailAmerica, Inc ("RailAmerica"), a shortline holding company that controls Mid-Michigan Railroad, Inc ("MMRR"). The purpose of this verified statement is to describe how I developed the revenues and costs of M RR over the 15 83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122 00, the end of the line, in Kent and Ionia Counties, MI (the "Line")

I have been Director of Finance for last two years and was Director of Planning for prior nine years with RailAmerica. As Director of planning, I was responsible for planning, analyzing traffic profitability and financial results, acquisition modeling, and budgeting for RailAmerica's subsidiary railroads. My prior experience with Southern Pacific was as Director of Budgeting for Operating Department.

My current duties include responsibility for planning, cost modeling, profitability analysis, analyzing financial results, acquisition modeling and budgeting of railroads for two regions.

1. Background. The Surface Transportation Board (the "Board") has developed a very sophisticated methodology in 49 C.F.R. Part 1152 Subpart D for calculating revenues and avoidable costs of a line of railroad that a railroad is seeking to abandon. The predicate for using these procedures is maintaining data in accordance with the Branch Line Accounting System (the "BLAS"). Only Class I railroads are required to

maintain records in accordance with the BLAS. As a Class III railroad, MMRR does not maintain its records in accord with the BLAS.

Using the data and resources available to me from the MMRR, I have tried to present the Board with an accurate analysis of the revenue generated by the Line and the costs of operating the Line. In conducting this analysis, I have developed a Forecast Year based on traffic from customers on the Line who will continue you use rail service.

2. Forecast Year Traffic. There are two customers using the Line. Both are located near Ionia near the end of the Line. The customers are Standard Lumber ("SL") and Gallagher Fertilizer ("GF") The following Table sets out the recent traffic volume.

	2004	2005	2006	2007 (through June 30)
GF	8	11	15	9
SL	1	2	2	1
Total	9	13	17	10

There were 17 cars on the Line in 2006 and 10 for the first half of 2007 Therefore, I will calculate the revenues and costs of operation based on the annual shipment of 20 carloads, the 2007 traffic annualized. This is very conservative since the traffic on the Line has not reached this level in any year over a four year period.

1. Revenue. Revenue generated for the first six months of 2007 were \$6,079. Annualized, revenues would be \$12,158.00.

2. Avoidable Costs. In calculating the avoidable costs of operating over the Line, I will determine the costs of operation and use the costs to maintain the Line prepared by Mr. Garvin.

a. Costs of Operation. The cost to operate a train on the Line depend on the amount of time spent on the Line, the numbers of trips on the Line, the number of employees and their compensation, the number of locomotives used and their cost, the cost of fuel, and the overhead costs that include general and administrative costs, depreciation, and the maintenance of way costs as developed by Mr. Garvin.

An average trip to serve GL and SL takes about 4.5 hours round trip. Each time the shippers are served, it requires two trips, one to drop off a car and another to pick up the car. Because MMRR is serving GL and SL sporadically, MMRR cannot combine trips to pick up and deliver cars at the same time.

In 2007, there were two people in the train crew serving GL and SL. I foresee a two person train crew for at least the next two years, including the Forecast Year. Hourly wages for each crew member is \$17.21 per hour and their benefits are equal to about 71.02 percent of wages. Therefore, for the 40 4.5 hour trips to GL and SL, MMRR's employee costs are \$10,595.71 ($2 \times 40 \times 4.5 \times 17.21 \times 1.7102$)

MMRR uses one 2000 horsepower locomotive to serve GL and SL. Daily rental of the locomotive from RailAmerica is \$114.00. The locomotive burns about 6.5 gallons per hour based on grade and amount of tonnage being hauled, and for 2007, the average cost per gallon was \$2.27. I do not foresee the cost of fuel dropping in 2008. The locomotive fuel cost for 40 4.5 hour trips is \$2,655.90 ($(40 \times 4.5 \times 6.5 \times 2.27)$) and the locomotive rental is \$855.00 ($114 \times 40 \times 4.5 / 24$)).

Based on the above costs \$10,595.71 (crew costs) plus \$2,655.90 (locomotive fuel) plus \$855.00 (for locomotive rental) and \$7,053.30 (50% for overhead), the total yearly costs are \$21,159.91.

b. Maintenance of Way Costs. Mr. Garvin has developed an annual maintenance of way cost of \$79,150 for the Line, which I adopt and will use.

c. Summary of Avoidable Costs. The annual operating costs on the Line are \$21,159.91. Annual maintenance of way costs on the Line are \$79,150. Total avoidable costs on the Line are \$100,309.91

3. Avoidable losses. The annual revenue projected for the Line is \$12,158.00. Annual avoidable costs are \$100,309.91, resulting in an avoidable loss of \$88,151.91

VERIFICATION

I, Robert M. Frelich, Jr., verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement

Executed on December 7, 2007


Robert M. Frelich, Jr.

EXHIBIT H—TODD N. CECIL VERIFIED STATEMENT

MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT AND IONIA COUNTIES, MI

VERIFIED STATEMENT OF TODD N CECIL

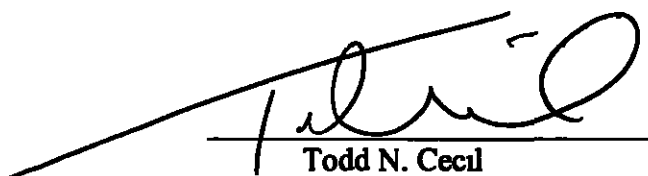
My name is Todd N Cecil. I am employed as Vice President, Real Estate, for RailAmerica, Inc., and the Mid-Michigan Railroad, Inc. ("MMRR"). My credentials are provided in Exhibit. The purpose of this statement is to provide the Surface Transportation Board with the valuation of the real estate on the 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI (the "Line").

I have negotiated a Memorandum of Understanding (the "MOU") with the West Michigan Trails and Greenways Coalition to sell the real estate in the Line and the 26.4-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent and Montcalm Counties, MI for interim trail use/rail banking. Based on these negotiations, I expect to sell both lines for about \$2,300,000. Based on the acreage and other relevant factors, the Line contains about 44 percent of the value in the transaction or \$1,012,000. In my professional opinion, this is a very reasonable valuation for the Line.

VERIFICATION

I, Todd N. Cecil, verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement

Executed on November 26, 2007.



Todd N. Cecil

EXHIBIT-QUALIFICATIONS OF MR. CECIL

My office address is 4040 Broadway, Suite 200, San Antonio, Texas 78209 I have been employed by RailAmerica since its acquisition of RailTex, Inc. in February 2000. Prior to that time I was employed by RailTex for seven years (since February 1993), most recently in the position of Vice President – Real Estate.

My current duties and responsibilities include the management, development and disposition of the various real estate interests included within RailAmerica's international railroad portfolio. These real estate interests are located all throughout the United States and Canada. Included in my duties are the appraising of various interests in railroad-owned real estate, reviewing the appraisals of others, and handling negotiations for sales, leases, acquisitions and other real estate transactions.

My prior railroad-related real estate experience consists of ten years with various subsidiaries of CSX Transportation, Inc. (including Chessie Resources, Inc., CSX Resources, Inc., Chessie Systems, and CSX Real Property, Inc.) between 1980 and 1990. During this period I rose through the corporate ranks to the level of Regional Manager, Great Lakes, with responsibility for the management of all CSX real estate holdings in Michigan, Ontario, and portions of Indiana and Illinois (including Chicago).

Also, for three years between my employment with CSX and RailTex (1990-1993), I was employed by Tricore Tosto, a metro-Detroit full-service real estate company in the position of Vice-President of the Appraisal and Consulting Division. During this time I was involved in the appraisal of many types of income producing properties (including industrial, commercial, residential and special purpose properties), and also

provided corridor and other real estate valuation consulting services to railroad and utility companies

I am a 1977 graduate of Bowling Green State University (Bowling Green, Ohio) with a Bachelor of Arts Degree in Geography (Regional Planning) I also earned a Master of Arts Degree in Geography from the same university in 1980

I have successfully completed numerous real estate appraisal courses offered by the Appraisal Institute (formerly the American Institute of Real Estate Appraisers) including

Real Estate Appraisal Principles

Basic Valuation Procedures

Capitalization Theory and Technique - Part 1

Capitalization Theory and Technique - Part 2

Capitalization Theory and Technique - Part 3

Case Studies in Real Estate Valuation

Valuation Analysis and Report Writing

Investment Analysis

Standards of Professional Practice

Real Estate Disclosure

Litigation Valuation

Internet Search Techniques for Real Estate Appraisers

GIS Applications for Real Estate Appraisal

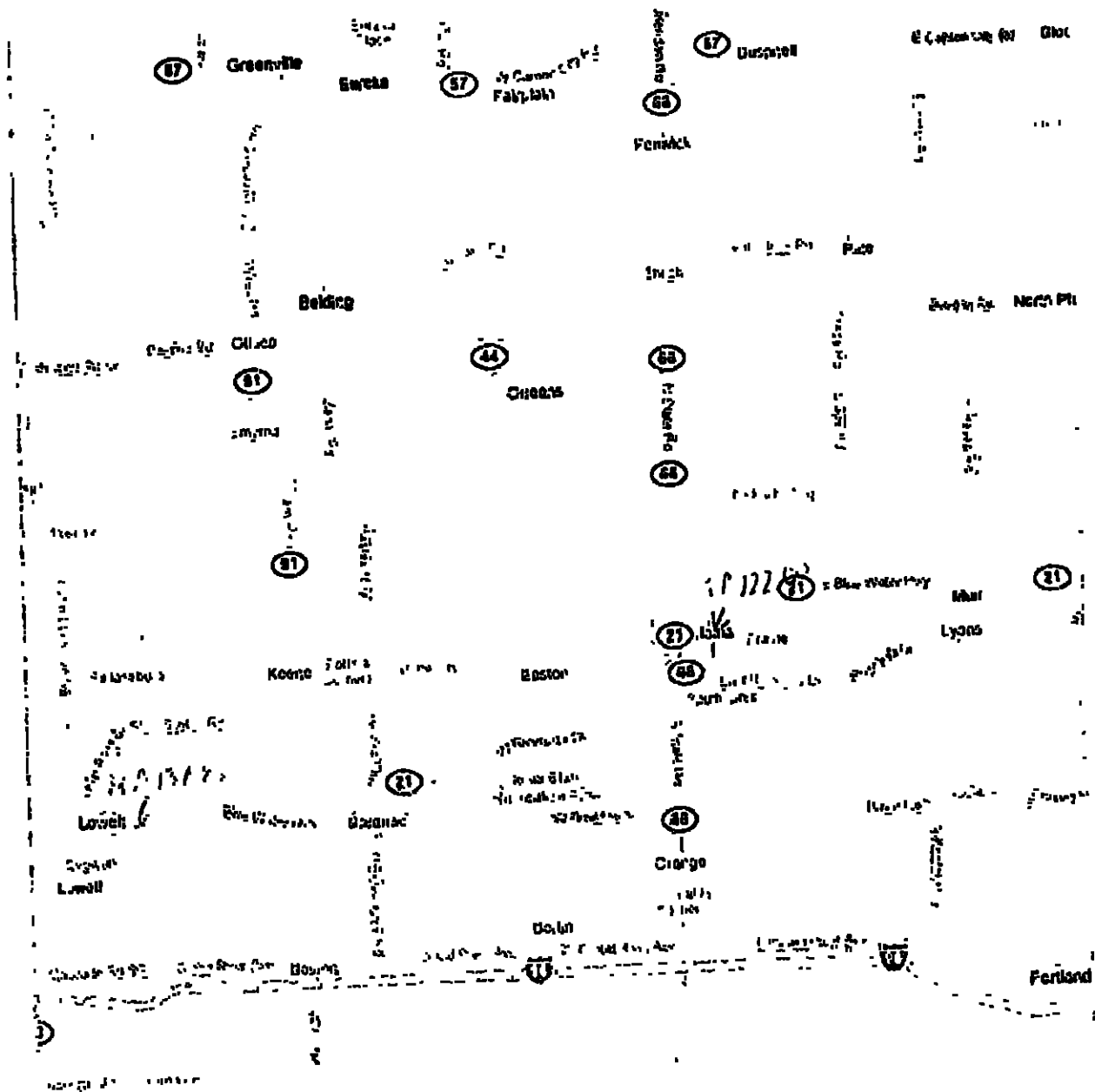
In summary, my professional railroad real estate experience includes over 20 years of appraising, selling, leasing, and managing railroad properties Included in this experience are numerous railroad corridor valuation and disposition projects These properties include numerous railroad corridors and railroad corridor segments (including urban, suburban, and rural) running through diverse neighborhood types and consisting of a wide spectrum of highest and best uses

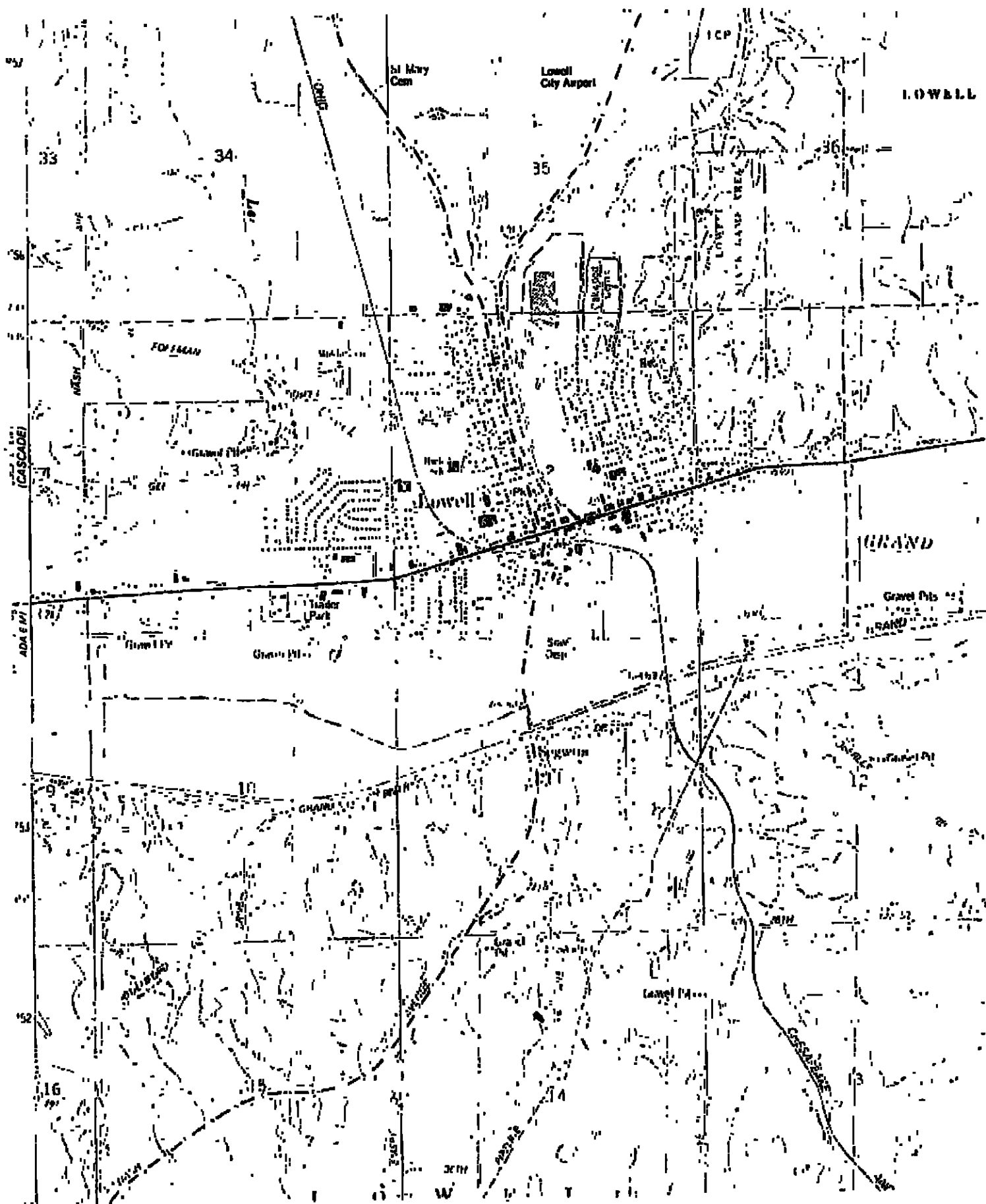
I have also prepared and reviewed appraisals and valuation studies of virtually all types of property (commercial, industrial, residential, special purpose, railroad corridors, etc) located in over twenty (20) states located throughout the country, in Canada, and in Chile

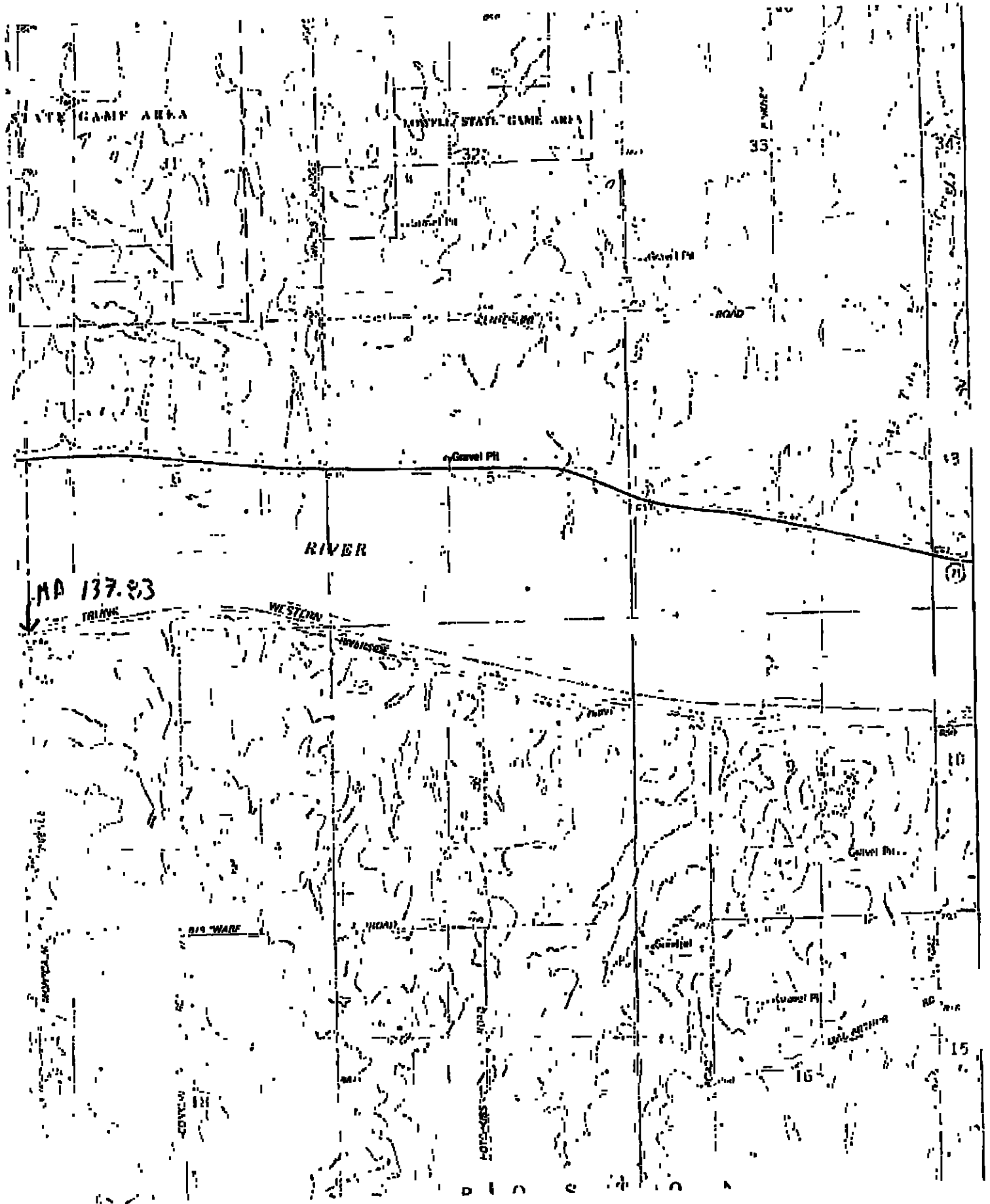
In addition, over the years I have been involved in negotiating hundreds of purchase and sale transactions involving railroad real estate properties. This experience has provided me with unique insight into the value potential of railroad real estate, the potential motivations of purchasers for these properties, as well as a feel for the marketability of railroad properties of nearly all potential land uses.

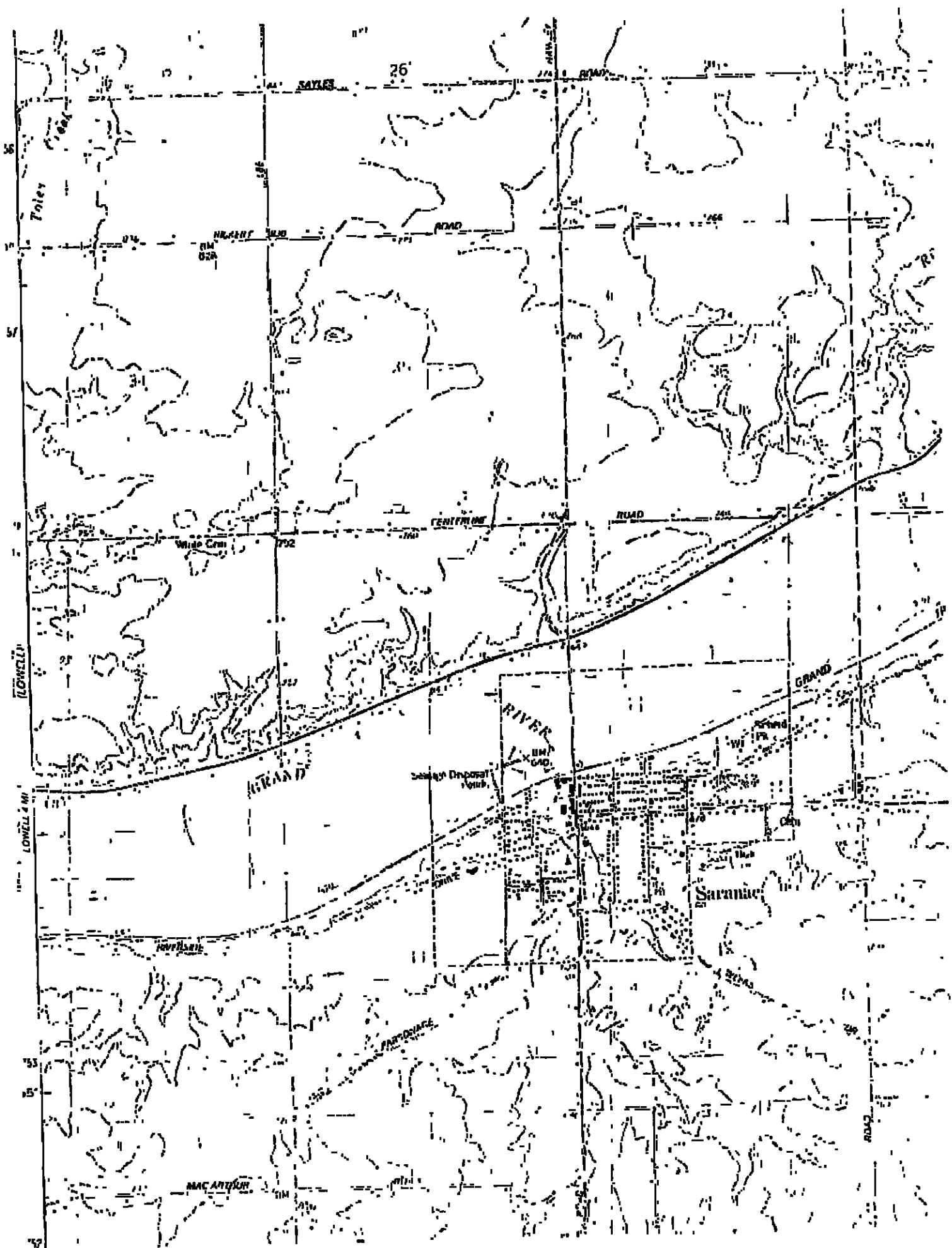
EXHIBIT I—COLOR EXHIBITS

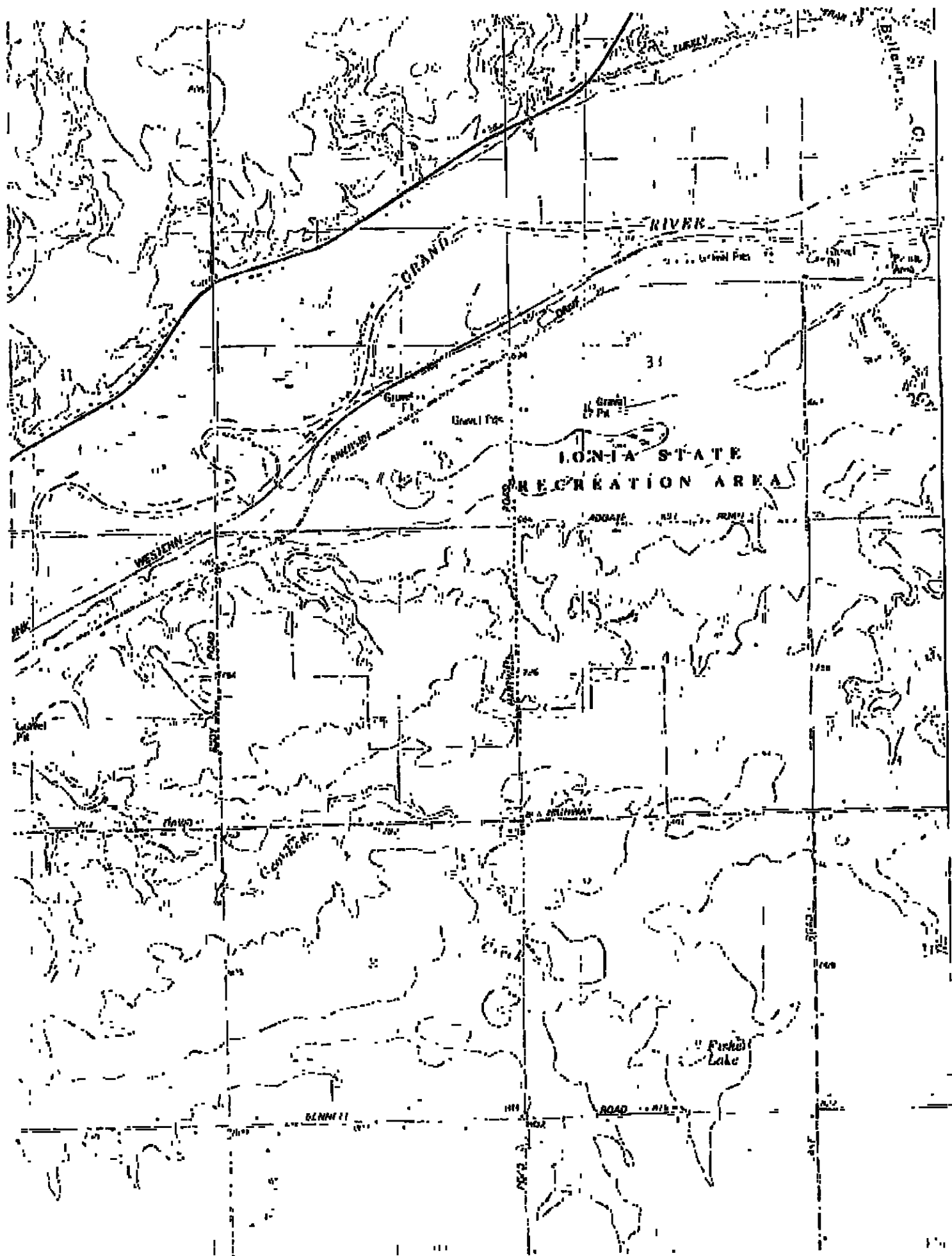




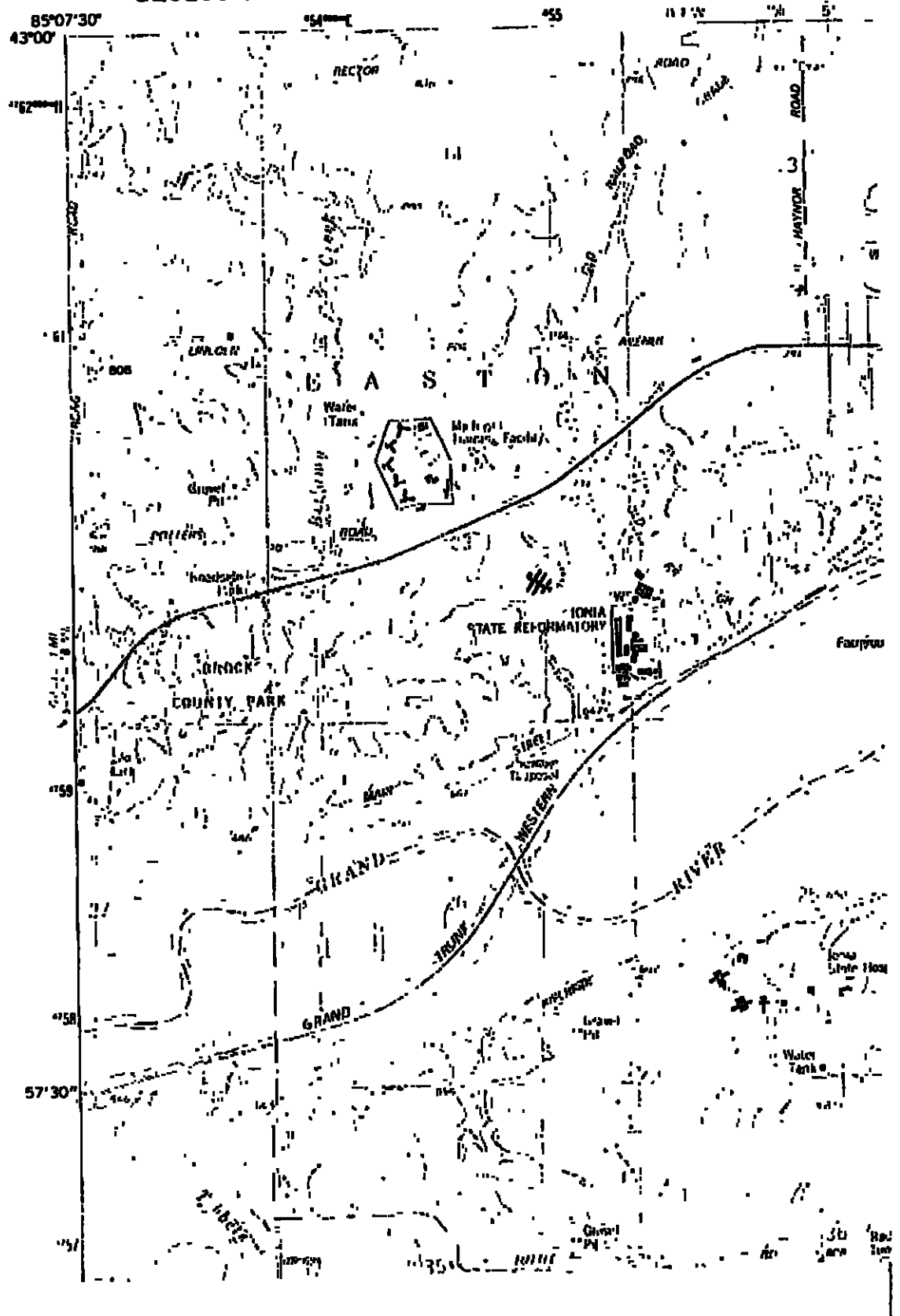


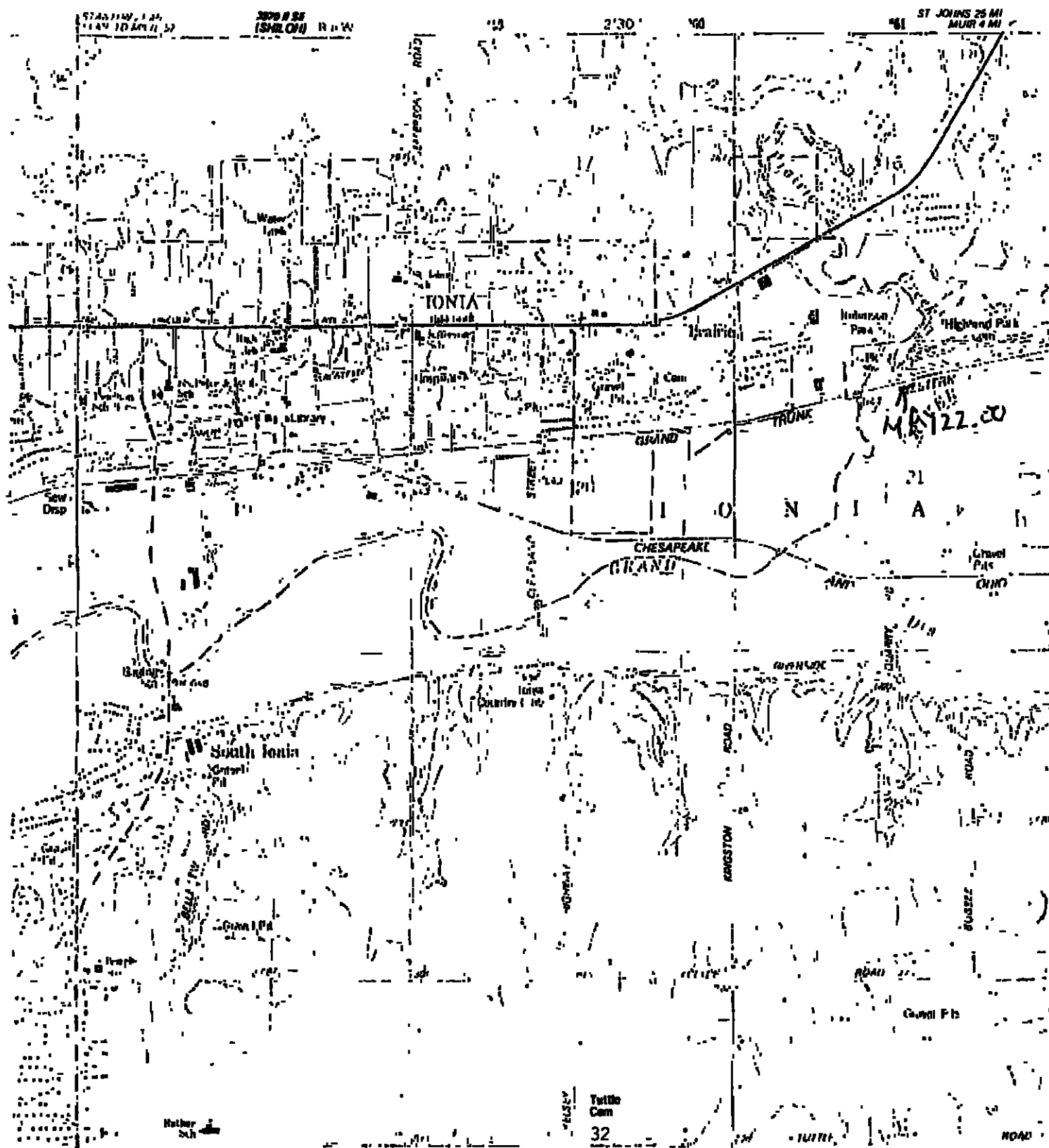






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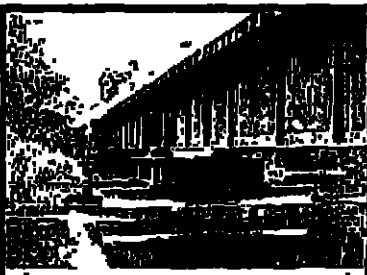
Greenville 81.10

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Relmar					
Inspection Date:	May 22, 2006					
Timber Trestle Structure						
Structure	PT	Deck Type	Ballast	Crossing	River	
# Spans:	13	Length:	175	Access:	< 1/2 mile	
# Tracks:	1	Height:		Flow Dir:	R - L	
Year Built	1943	Alignment:	C			Greenville 81 10 Flat River
General		G/F/P/B	Superstructure		G/F/P/B	Substructure
Scour		Fair	Stringers		Poor	Bridge Seats/Caps
Channel/Road		Poor	Floor Beams			Abuts/Backwalls
Approach		Fair	Girders/Truss/Slab			Piers, Towers, Bents
Deck		G/F/P/B	Top Flange			Misc
Ties		Fair	Bottom Flange			Guard Rail
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
						Overall Rating:
						Poor
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P11-P12	- Bent 11 cap crushing - urgent replacement still required					
P10	- Bent 8 - piles 2 and 6 punky - other piles sound OK					
	Delcan 2005 Notes					
P01	- Approaches low					
P06-P09	- Bent 11 - urgent pile cap replacement from last year not yet done - cap crushing					
	- Bent 7 - piles 2 and 3 punky, pile 4 OK					
	- Bent 8 - piles 2 and 6 punky (piles 4 and 5 seem to be OK)					
	Delcan 2004 Notes:					
P01	- Approaches uneven					
P03	- Ballast deck ties OK					
P04	- Inspected under traffic - no pumping evident near first approach					
	- Bent 6 - pile 4 hollow, pile 6 OK					
	- Bent 7 - pile 2 hollow, pile 6 OK					
	- Bent 8 - piles 2, 4 and 5 are punky near waterline					
	- Bent 9 - pile 6 punky near waterline					
	- Bent 10 - pile 4 is punky near waterline					
P09	- Bent 11 - pile cap crushed - urgent replacement required					
P02	- Debris in channel on right					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Urgent	Replace pile cap on bent 11 - \$5,000					
3 years	Post bent 8 - piles 2 and 6 - \$5,000					
5 years	Post bents - \$20,000					
	Banding program for bent 14 pile cap					

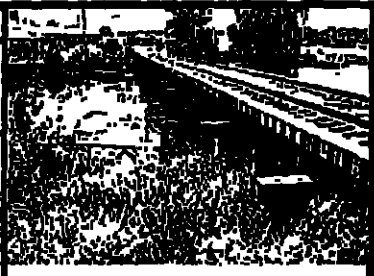
Greenville 81.60

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Steel Structure (Girders/Beams)						
Structure	DPG	Deck Typ:	Open	Crossing	Stream	
# Spans	2	Length	100	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1910	Alignment	T			
Greenville 81.60 Stream						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers			
Channel/Road		Fair	Floor Beams		Fair	
Approach		Fair	Girders/Truss/Slab		Fair	
Deck		G/F/P/B	Top Flange		Fair	
Ties (Open Deck)		Fair	Bottom Flange		Fair	
Tie Spacers		Fair	Web/Diagonals		Fair	
Track		Fair	Bearing Stiffeners		Fair	
Footwalk			Bracing		Fair	
Handrail			Bearings		Fair	
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P01	- First approach a bit low this year					
P03	- Open deck - 12 reject ties this year					
P09	- Pier 1 - right side - monitoring cracking - OK for now					
	Delcan 2005 Notes:					
	- Approaches OK					
	- 6/99 reject ties (6%)					
	Delcan 2004 Notes:					
P01	- Approaches a bit low					
P03	- 5/99 reject ties (5%)					
P12,P08	- Pier 1 - crack below right bearing on upmile face only - monitor					
P08	- Abutment 1 - right bearing seat - some cracking at previous repair - monitor					
	UMA 2003 Notes:					
	12/99 ties poor. Extensive delamination of abutment 1 concrete. Backwall is horizontally cracked 1/2" in 2 locations Pier 1 concrete is scaling Plan on concrete repairs to pier and abutment #1.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Monitor	Crack on upmileage face of Pier 1					

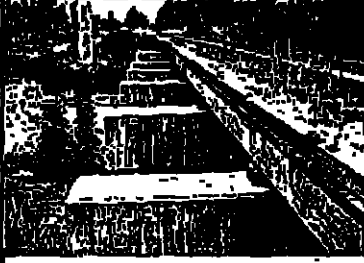
Greenville 87.40

		Bridge Inspection Report				
		Mid-Michigan Railway				
		Greenville				
		Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Timber Trestle Structure with Steel Mainspan(s)						
Structure	PT/DPG	Deck Typ	Open	Crossing	River	
# Spans	7	Length	165	Access:	< 1/2 mile	
# Tracks	1	Height		Flow Dir.		
Year Built	1914	Alignment	T			
Greenville 87.4 Flat River						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers		Poor	
Channel/Road		Fair	Floor Beams			
Approach		Fair	Girders/Truss/Slab		Fair	
Deck		G/F/P/B	Top Flange		Fair	
Ties (Open Deck)		Poor	Bottom Flange		Fair	
Tie Spacers		Fair	Web/Diagonals		Fair	
Track		Fair	Bearing Stiffners		Fair	
Footwalk			Bracing		Fair	
Handrail			Bearings		Fair	
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P12	- Span 7 - stringer 1 rotten and beginning to crush - other stringers OK for now					
P05,P06	- Span 1 - stringers 2 and 8 split but OK for now					
P03	- Open deck on DPG mainspans - 18 reject ties on mainspans					
	Delcan 2005 Notes:					
	- Approaches OK					
	- 18/99 reject ties (18%)					
	- Span 1 - stringers 2 and 8 split					
	- Span 7 - Stringer 1 rotten					
	Delcan 2004 Notes:					
P01	- Approaches high					
P03	- 17/99 reject ties (17%)					
P04	- Ballast deck ties on approach spans poor					
P12	- Span 1 - stringer 2 splitting vertically					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Replace stringer 1 - bents 6 to 8 - \$6,000					

Greenville 88.20

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2008					
Steel Structure (Girders/Beams)						
Structure	Steel Trestle	Deck Typ.	Ballast	Crossing	River	
# Spans	17	Length	225	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	1918	Alignment	C			
Greenville 88.20 Flat River						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair		Stringers	Good	Bridge Seats/Caps	
Channel/Road	Fair		Floor Beams		Abuts/Backwalls	
Approach	Fair		Girders/Truss/Slab		Piers, Towers, Bents	
Deck	G/F/P/B		Top Flange		Misc	
Ties (Open Deck)	Good		Bottom Flange		Guard Rail	
Tie Spacers	Good		Web/Diagonals			
Track	Good		Bearing Stiffeners			
Footwalk			Bracing	Fair		
Handrail			Bearings			
Overall Rating:					Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes					
P01-P03	- No change in condition since 2005. - Since major repairs were relatively recent, detailed inspection of piles not yet reqd					
	Delcan 2005 Notes.					
	- No changes since 2004 inspection					
	Delcan 2004 Notes.					
P01	- Approaches OK					
P06	- Steel frame bents installed on cut timber piles - sill plates at varying elevations					
P05,P07	- Bents 4 and 16 not replaced after fire					
P02	- Open deck - all ties are new and in good condition					
	UMA 2003 Notes:					
	This bridge was burned down 2 years ago and repaired by steel frame bents and steel stringers. New deck. All fair. No action required					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

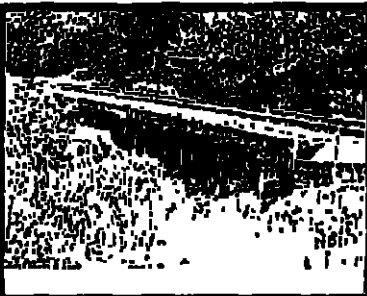
Greenville 89.30

		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By:		Stan Reimer			DELCAN		
Inspection Date:		May 22, 2006					
Timber Trestle Structure with Steel Mainspan(s)							
Structure	PT/Beam	Deck Typ	Open	Crossing	River	Greenville 89.30 Flat River	
# Spans:	17	Length	277	Access	Road		
# Tracks	1	Height		Flow Dir.	R - L		
Year Built	?	Alignment	T				
General		G/F/P/B	Superstructure		G/F/P/B	Substructure	G/F/P/B
Scour	Fair		Stringers	Poor	Bridge Seats/Caps	Poor	
Channel/Road	Fair		Floor Beams		Abuts/Backwalls	Fair	
Approach	Fair		Girders/Truss/Slab		Piers, Towers, Bents	Poor	
Deck		G/F/P/B	Top Flange		Misc	G/F/P/B	
Ties (Open Deck)	Fair		Bottom Flange		Guard Rail		
Tie Spacers	Fair		Web/Diagonals				
Track	Fair		Bearing Stiffeners				
Footwalk			Bracing				
Handrail			Bearings		Overall Rating:	Poor	
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes:						
P08	- Span 1 sinkhole in ballast deck						
P06	- Stringer 1 in span 1 - recently replaced - new stringer width is less						
P11,P12	- Timber sill plates of bents 12 and 13 are on concrete slabs so not as urgent						
	Delcan 2005 Notes:						
P02	- Bent 3 cap replaced						
P03	- Span 1 - stringer 1 replaced						
P12	- Stringer 1 crushing over bent 16 (not bent 18)						
	Delcan 2004 Notes						
P01	- Approaches a bit low						
P03	- 0/28 reject ties (0%) for beam span						
P22,P23	- Ballast deck ties poor						
P04	- Sinkhole through ballast trough floor near bent 2						
P05,P06	- Span 1 - stringer 1 crushing and rotating out at bent 1 - to be replaced						
P09,P10	- Bent 3 pile cap crushing - urgent replacement						
P11	- Most bents are steel pipe piles with concrete pile caps - debris in river on right						
P12	- Stringer 2 from bents 3 to 5 - end rot						
P13	- Bent 5 - timber blocking on concrete caps is rotting						
P14	- Bent 13 - timber sill plate rotten and to be replaced						
P15	- Bent 14 - timber sill plate rotten and to be replaced						
P16,P17	- Bent 14 - pile cap starting to rot, post 4 is rotten and hollow						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
1 year	Replace stringer 1 over bent 16 - \$5,000						
3 years	Replace sill plates for bents 13 and 14 - \$10,000						
3 years	Replace pile caps for bents 1, 14 and 15 - \$15,000						

A black and white photograph showing a bridge spanning a river. The bridge has a railing and appears to be made of stone or concrete. In the background, there are trees and some buildings, possibly a town or city. The foreground shows the water of the river and some foliage on the left bank.

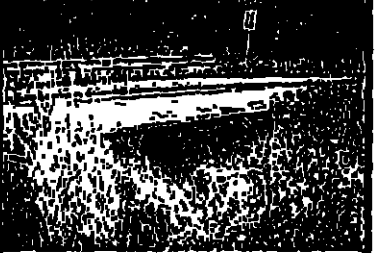
Delcan Inc.

Greenville 91.60

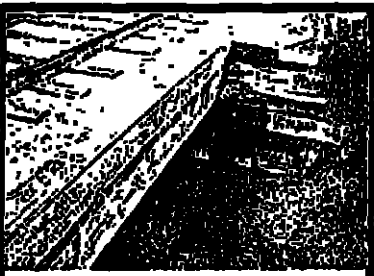
		Bridge Inspection Report					
		Mid-Michigan Railway Greenville Michigan					
Inspected By:	Stan Reimar						
Inspection Date:	May 22, 2006						
Timber Trestle Structure							
Structure:	PT	Deck Typ	Ballast	Crossing:	Stream		
# Spans:	6	Length	82	Access:	Road		
# Tracks	1	Height		Flow Dir:	R - L		
Year Built	?	Alignment	T				
						Greenville 91.60 Stream	
General		G/F/P/B	Superstructure		G/F/P/B	Substructure	
Scour	Fair		Stringers	Fair		Bridge Seats/Caps	
Channel/Road	Fair		Floor Beams			Abuts/Backwalls	
Approach	Fair		Girders/Truss/Slab			Piers, Towers, Bents	
Deck	G/F/P/B		Top Flange			Misc	
Ties	Fair		Bottom Flange			Guard Rail	
Tie Spacers			Web/Diagonals				
Track	Fair		Bearing Stiffeners				
Footwalk			Bracing	Fair			
Handrail			Bearings				
						Overall Rating:	
						Fair	
COMMENTS							
Photo #	Remarks						
	Delcan 2006 Notes:						
	- this bridge has urgent work that has not been done						
P04	- Bent 1 - stumps 1 and 6 are rotten						
P05	- Bent 2 - piles 3 and 4 are posted, piles 1, 5 and 6 are rotten - urgent repair reqd						
P08	- Bent 4 - piles 1, 2, 3 and 6 are reject - needs framing too						
P09,P10	- Bent 7 pile cap is rotten on left						
	Delcan 2005 Notes:						
P03	- Bent 1 - stump 4 is rotten						
P04	- Bent 2 - piles 1, 2, 5 and 6 are rotten - frame bent now						
P07	- Bent 5 - pile 1 is gone, piles 2, 3 and 4 are punky						
P09-P10	- Bent 7 - pile cap rotten						
	Delcan 2004 Notes:						
P01	- Approaches OK						
	- Ballast deck ties OK						
P06	- Bent 2 - piles 1, 2 and 5 are hollow, piles 3 and 4 are posted						
P07	- Bent 3 - Pile 4 completely hollow						
P08,P10	- Bent 4 - pile 3 is rotten near waterline, pile 2 is punky						
P11	- Bent 5 - pile 1 is crushed, others sound punky - frame within 1 year						
P16,P18	- Bent 6 - pile cap split and to be banded, post 1 split and to be banded						
P15	- Bent 7 - pile cap is split on right						
MAINTENANCE RECOMMENDATIONS							
Urgency	Description						
Urgent	Frame bents 2, 4 and 5 - \$30,000						
1 year	Post bent 3 - pile 4, bent 4 - pile 3 - \$10,000						
1 year	Replace bent 7 pile cap - \$5,000						
	Banding Program.- Bent 6 - cap and post 1						
	Consider replacement with culvert for \$35,000						

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Greenville 94.70

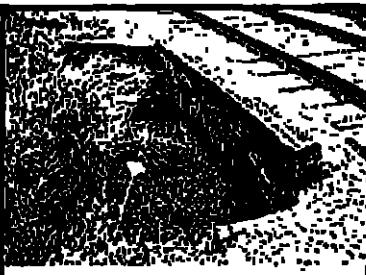
		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Steel Structure (Girders/Beams)						
Structure	Iron Bridge	Deck Type	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
						Greenville 94.70 Road Bridge
General		G/F/P/B	Superstructure		G/F/P/B	Substructure
Scour			Stringers			Bridge Seats/Caps
Channel/Road			Floor Beams			Abuts/Backwalls
Approach			Girders/Truss/Slab			Piers, Towers, Bents
Deck		G/F/P/B	Top Flange			Misc
Ties (Open Deck)			Bottom Flange			Guard Rail
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
						Overall Rating: Poor
COMMENTS						
Photo #	Remarks					
P03	Delcan 2006 Notes: - Timber bearing blocks for rail stringers are rotting at ends - OK for now					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- This is a road bridge adjacent to and crossing the tracks					
P04	- Superstructure is steel rails on top of timber abutments, timber deck					
	- Consider closing this bridge or turning it over to road agency					
	- Otherwise, consider replacing with a culvert when bridge starts to fail					
P01	- Bridge is posted for 15 tons					
	UMA 2003 Notes: - Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 95.50

		Bridge Inspection Report				
		Mid-Michigan Railway				
		Greenville Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Timber Trestle Structure						
Structure:	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	1	Length	13	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir.	R - L	
Year Built	1929	Alignment	T			
Greenville 95.50 Cattle Pass						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers		Poor	
Channel/Road		Fair	Floor Beams			
Approach		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange			
Ties		Fair	Bottom Flange			
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating:					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P05	- Stringer 5 rotten at bent 1					
P06	- Bent 1 cap rotten on left					
	- Bent 1 piles 2 and 4 are rotten, pile 3 is posted					
	Delcan 2005 Notes:					
P08	- Stringer 5 is rotten					
P03-P04	- Bent 1 pile cap rotten					
P05	- Bent 1 - piles 2 and 4 are hollow					
	Delcan 2004 Notes					
P01	- Approaches OK					
P03	- Ballast deck ties OK					
P06	- Bent 1 - piles 2 and 4 hollow					
P04,P07	- Bent 1 cap starting to rot on left					
	UMA 2003 Notes					
	Bent 2 was replaced with a frame bent Bent 1 cap 1 is rotted on left side. 9-8x16 stringers. Piles 2 & 4 are hollow at top. Pile 3 is posted. Bent 1 needs to be framed within 3 years					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
3 years	Frame bent 1 - \$10,000					
5 years	Replace Stringers \$10,000					

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Greenville 99.50

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Timber Trestle Structure						
Structure:	PT	Deck Typ.	Ballast	Crossing	Stream	
# Spans	1	Length:	13	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built:	1929	Alignment	T			
General		G/I/P/B	Superstructure		G/I/P/B	
Scour	Fair		Stringers	Fair	Bridge Seats/Caps	
Channel/Road Approach	Fair		Floor Beams		Abuts/Backwalls	
Deck	G/I/P/B		Girders/Truss/Slab		Piers, Towers, Bents	
Ties	Fair		Top Flange		Misc	
Tie Spacers			Bottom Flange		Guard Rail	
Track	Fair		Web/Diagonals			
Footwalk			Bearing Stiffeners			
Handrail			Bracing			
			Bearings			
Overall Rating:					Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes.					
P01-P05	- No change in condition since 2005					
	Delcan 2005 Notes					
	- No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P03	- Ballast deck ties OK					
P06	- Bent 2 - pile 3 split and to be banded					
	UMA 2003 Notes:					
	9-8x16 stringers Bent 2 pile 1 needs to be on plan to post. Both caps are fair.					
	Ballast curbs are tipping.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	Banding program - bent 2, pile 3					

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Raimor		DELCAN		
Inspection Date:		May 22, 2006				
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	1	Length	13	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir.	R - L	
Year Built	1929/50	Alignment	- T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair		Stringers	Poor		
Channel/Road	Fair		Floor Beams			
Approach	Fair		Girders/Truss/Slab			
Deck	G/F/P/B		Top Flange			
Ties	Fair		Bottom Flange			
Tie Spacers			Web/Diagonals			
Track	Fair		Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating:					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P04,P06	- Stringer 1 is hollow and stringer 9 sounds punky - other stringers are OK					
P05	- Bent 1 - piles 1, 2, 4 and 5 are hollow and/or rotten - needs framing					
	Delcan 2005 Notes:					
P05,P06	- Stringer 1 and 9 are rotten					
P04	- Bent 2 - piles 1, 2, 4 and 5 are hollow					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P02	- Ballast deck ties OK					
P04	- Bent 2 - pile 5 hollow					
P05	- Bent 1 - pile 4 punky					
P06,P07	- Stringers discolored, stringer 9 starting to rot					
	UMA 2003 Notes:					
	Bent 1 pile 4 is hollow. Bent 2 pile 1 is bad; 2, 4 & 5 are hollow; 3 is fair; 6 is solid. -					
	Stringer 9 is hollow. Bent 2 needs to be framed within 1 year.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Frame bent 2 - \$10,000					
3 years	Replace 2 stringers - \$10,000					

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Greenville 103.00

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