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Office of Chief Counsel
June 25, 2026
Part of
Public Record

VIA E-FILING

June 25, 2026

Ms. Cynthia T. Brown
Chief of Case Administration
United States Surface Transportation Board
Office of Chief Counsel
395 E Street, SW
Washington, DC 20423-0001

Re: Comments on Docket No. AB-1351X St. Paul & Pacific Railroad Company, LLC
Discontinuance of Service Exemption in Santa Cruz County, California

Dear Chief Brown,

The use of an exemption by the railroad to discontinue the freight easement on the north end of the Santa Cruz Branch is wholly inappropriate for two reasons.

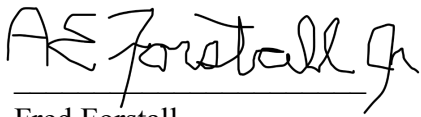
First, it is my understanding that the line in question has been out of service for the entire period of ownership by St. Paul & Pacific (SP&P), during which time necessary repairs to reopen the line were never made. Under the circumstance, it would be a futile gesture for on-line customers to tender cars for shipment. Given the extended intransigence of the responsible party(s), it is ironic that the exemption process should place any weight at all on the fact that there has been no local traffic on the line for two years prior to the date of the notice. That's a cruel joke given that the line has been out of service almost eight years. How is this a proper use of the exemption process? In the cold, hard light of day the situation more closely resembles an unauthorized abandonment which SP&P now seeks the Board to sanctify using a "no questions asked" exemption. However, the questions and controversies surrounding the Santa Cruz Branch call for a more robust consideration of the question at hand than is allowed by the exemption process.

Second, discontinuance of the freight easement on the Santa Cruz Branch would eliminate the physical connection to the national railroad network of an active and duly authorized common carrier, the Santa Cruz, Big Trees & Pacific Railway (SCBG). The

unavoidable result of this, practically speaking, would be the “adverse abandonment” of SCBG. (The location of SCBG is shown on the map in Exhibit A of the SP&P filing. If the proper procedures to accomplish this result are beyond my understanding, I’d still bet that such a drastic outcome falls far outside the intended scope of the exemption process.

Thank you very much for this opportunity to comment.

Very Sincerely yours,

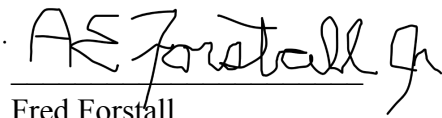
A handwritten signature in black ink, appearing to read "Fred Forstall". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Fred Forstall

Fairfax, Virginia

CERTIFICATE OF SERVICE

I certify that on this 25th day of June 2026, I have served a copy of these comments on the parties of record in this proceeding via e-mail.

A handwritten signature in black ink, appearing to read "Fred Forstall". The signature is written in a cursive, somewhat stylized font. The first part of the signature, "Fred", is written above a horizontal line, and the last part, "Forstall", is written below the line.

Fred Forstall
Fairfax, Virginia

June 25, 2026