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July 3, 2026

ENTERED
Office of Chief Counsel
July 15, 2026
Part of
Public Record

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 and Chair Fuchs,

The railroad's use of an exemption to discontinue the freight easement beyond the first 3 miles of the Santa Cruz Branch is concerning, as removing the rail line to build a trail conflicts with efforts to restore the Branch Rail Line to a useful condition for freight and other uses.

The Santa Cruz County Civil Grand Jury released its investigation on the Santa Cruz Branch Rail Line (SCBRL) on Monday, June 29 ([THE SANTA CRUZ BRANCH RAIL LINE: COMPETING VISIONS, EMERGING REALITIES](#)). It makes several recommendations and findings regarding the Santa Cruz County Regional Transportation Commission's (RTC) management and leadership as owner of the SCBRL.

If approved, the discontinuance application will facilitate the removal of rails to accommodate a paved trail. This will strand the Felton Branch line, which is operated by Roaring Camp and Big Trees Railroad. Big Trees is also operating freight service on the Branch Line between Milepost 3 in Watsonville and the Watsonville Junction with the Union Pacific line.

Please take care to review and consider the full context of this application and the affected parties before taking any actions on this matter.

Warm regards,

Barry Scott



Certificate of Service

I certify that I have, on this 15th day of July 2026, served by email copies of the foregoing document on all parties of record in this proceeding.

/s/ Barry Scott

Barry Scott

VERIFICATION

I, Barry Scott, resident of Santa Cruz County, state that I am duly authorized to sign this verification that my letter entitled Comments on Docket No. AB-1351X St. Paul & Pacific Railroad Company, LLC Discontinuance of Service Exemption in Santa Cruz County, California dated July 3, 2026 was prepared with the assistance of counsel for GKG Law upon which I have relied; and that the responses set forth herein, subject to inadvertent and undiscovered errors, are based upon and necessarily limited by the records and information in existence, presently recollected, and thus far discovered in the course of preparation of those responses. Subject to the limitations set forth herein, the said responses are true to the best of my knowledge, information, and belief. I declare under penalty of perjury under the laws of the United States of America that the Answer is true and correct.

Executed on July 6, 2026



Barry Scott