

July 20, 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

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Office of Chief Counsel
July 20, 2026
Part of
Public Record

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,

I ask that the Surface Transportation Board reject the railroad's request to end freight rail service on the Santa Cruz Branch Line between Watsonville and Davenport.

On paper, this request looks simple. The railroad says there hasn't been any freight traffic for more than two years, there is no through traffic, and there are no unresolved complaints about ending service.

But that leaves out an important part of the story.

This request is actually part of a larger plan by the Santa Cruz County Regional Transportation Commission (RTC) to remove the railroad tracks and replace them with an interim trail without going through the normal federal rail abandonment and railbanking process.

According to agreements approved by the RTC, the agency paid the railroad \$450,000 to file this request, kept the right to review and approve the filing before it was submitted, and plans to create a new nonprofit corporation to take over as the railroad operator after freight service is discontinued.

However, RTC has also publicly stated that it does not expect to provide freight service if someone requests it in the future. Instead, its goal is to build an interim trail that will require removing sections of the existing railroad tracks.

While the RTC maintains official Title VI nondiscrimination policies, South County and Watsonville residents (who are roughly 85% Latino) have historically raised concerns about inequitable planning and prioritization for the Rail Trail.

Funding and progress disparities resulting in substantial grants, including a landmark \$105 million in Active Transportation Program (ATP) funding, have primarily targeted segments in the northern, wealthier parts of the county (e.g., from Santa Cruz to Aptos). Segments spanning Watsonville and South County are to be constructed last, with the recreational trail in South

County diverted to surface streets, yet in the most constrained areas of the North County Rail Corridor, the RTC refuses to divert to surface streets and is attempting to use Discontinuance of Service Exemption to achieve their goal. This action by the RTC further exhibits inequality in the development of a linear park to the north and a trail adjoining an arterial road with speeds primarily above 40 mph in South County (San Andreas and West Beach)

South County faces higher pedestrian and cyclist fatality rates as well as severe vehicle congestion. Prioritizing expensive and constrained, North County-focused trail and potential rail projects before localized active transportation in Watsonville fails to address the most urgent public safety and utility needs of disadvantaged communities

To address these grievances, the RTC adopted a Transportation Equity Action Plan funded by Caltrans. It maps "equity priority communities" and requires targeted outreach to ensure minority and low-income populations are not left behind in project development. Clearly the RTC fails to adhere to its own policy mandates, and continues to advance inequality in transportation planning, pursuit of grant funding and project implementation.

A recent Civil Grand Jury report highlighted historic flaws in the RTC's strategic planning process, finding that key policy choices were not grounded in realistic engineering and financial realities. The report further underscored the need for the RTC to transparently evaluate project execution to better serve the entire county.

I believe this raises serious questions that deserve a full review instead of being handled through the Surface Transportation Board's simplified exemption process. This isn't just about ending freight service.

The request to discontinue service is only the first step in a larger plan. The second step is for RTC to take control of the line while building a trail that removes sections of track. Together, these actions could permanently eliminate freight rail service without going through the normal federal process designed for that purpose.

In previous cases, the RTC assured the Surface Transportation Board that it would not interfere with freight service, yet the RTC has done exactly that by failing to maintain the line, pushing the current operator off the railroad, paying it to leave, and planning to replace the tracks with a trail.

This is not a routine case. It involves years of disputes, multiple legal agreements, questions about who will actually operate the railroad, and significant public controversy. Because of those issues, the Board should require a full review instead of allowing the request to move forward automatically.

I ask that the Surface Transportation Board reject this Discontinuance of Service Exemption because it leaves out important facts and is being used to advance a much larger plan than simply ending freight service. If the Board is not prepared to reject the request immediately, it should at least pause the proceeding until these issues have been fully examined.

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CC: Parties of Record

Certificate of Service

I certify that I have, on this 20th day of July 2026, served by email copies of the foregoing document on all parties of record in this proceeding.

/s/ Erik Hansen
Erik Hansen