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Office of Chief Counsel  
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Part of  
Public Record

Eric M. Hocky  
T (215) 640-8523  
F (215) 640-8501  
Email: ehocky@clarkhill.com

Clark Hill  
Two Commerce Square  
2001 Market Street, Suite 2620  
Philadelphia, PA 19103  
T (215) 640-8500  
F (215) 640-8501

August 5, 2026

BY E-FILING

Chief of Case Administration  
Office of Chief Counsel  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20024

Re: St. Paul & Pacific Railroad Company, LLC – Discontinuance of Service  
Exemption – In Santa Cruz County, CA  
Docket No. AB 1351X

Dear Chief of Case Administration:

This letter is submitted on behalf of the Santa Cruz County Regional Transportation Commission ("RTC"). The RTC is not currently a party in this proceeding but seeks leave from the Board to submit this late-filed comment. Because the Board's decision served on July 30, 2026, states that it is holding the exemption request for further consideration, accepting this comment will not result in a delay in the handling of this proceeding.

The RTC is the non-carrier owner of the Santa Cruz Branch Rail Line ("Line") subject to the freight easement held by St. Paul & Pacific Railroad Company, LLC ("SPRR"), including the portion of the Line and freight easement that are the subject of this proceeding.

This proceeding presents the straightforward question of whether SPRR qualifies for the two-year out of service discontinuance exemption. In this proceeding, SPRR has sought a routine exemption to discontinue a portion of the Line pursuant to the Board's regulations for out-of-service rail lines where there has been no local traffic on the Line, no overhead traffic for more than two years, and no pending or decided formal complaints from rail customers regarding cessation of service. Without admitting or responding to the various allegations contained in the comments filed in this proceeding, the RTC notes that issues of asset ownership and management, and future disposition are not currently before the Board. The RTC supports SPRR's discontinuance exemption.

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I certify that a copy of this letter was served on all parties of record in this proceeding.

Respectfully,

CLARK HILL

*/s/ Eric M. Hocky*

Eric M. Hocky  
*Counsel for Santa Cruz County  
Regional Transportation Commission*

EMH:e

cc: Robert A. Wimbish, *Counsel for SPPR*  
All Parties of Record