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ENTERED
Office of Chief Counsel
October 26, 2026
Part of
Public Record

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October 26, 2026

VIA E-FILING
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company, FD 36946

Dear Chief of Case Administration:

Pacific Harbor Line, Inc. ("PHL") respectfully submits the attached letters from seven customers served by PHL whose rail service would be affected by the proposed transaction involving operations at the Port of Los Angeles and Port of Long Beach (together, the "Ports")—Epsilon Plastics, Inc., Konoike Pacific California, Inc., Los Angeles Harbor Grain Terminal, LLC, SA Recycling, LLC, Shell Oil, Linde Inc., and WWL Vehicle Services Americas, Inc. (together, the "Port Shippers")—and one environmental group, Coalition for Clean Air. These letters supplement PHL's October 21, 2026 letter responding to the Board's decision served on October 15, 2026 (the "Stay Decision"). Alameda Belt Line ("ABL") filed a verified notice of exemption on September 16, 2026. The Stay Decision postponed the effective date of ABL's exemption until further order of the Board to allow sufficient time to consider the issues raised in PHL's request for a housekeeping stay and ABL's reply. PHL's October 7, 2026 request sought a stay until ABL provided the Board, PHL, and the shipping public with sufficient information to evaluate whether the proposed transfer of operations qualifies for the class exemption process and can occur without disruption.

In its October 7 request, PHL identified three related concerns: whether the record established the necessary agreements and approvals or sufficient details about when they would be obtained; how personnel, management, equipment, operating responsibilities, and service would be transferred without disruption; and the consequences of a service failure at these nationally significant terminal facilities. See PHL Request for a Housekeeping Stay at 1, 4. The

attached letters reinforce the service-continuity concerns underlying that request and the need for the detailed transition plan described in PHL's October 21 letter.

The shipper letters collectively underscore the importance of uninterrupted rail service and the potential for a service disruption at the Ports to have serious adverse impacts on the supply chain in the United States. As explained in PHL's October 21, 2026 letter, the Ports handle hundreds of billions of dollars of cargo annually. The Port Shippers receive raw materials for plastic-bag manufacturing and handle frozen food, agricultural products, metal recycling, iron ore, lubricants, industrial gases, and automobiles. The shipper letters collectively support continued Board review to protect service continuity; several specifically urge review of ABL's transition plan to ensure a seamless transfer of operations from PHL to ABL without a service disruption.

The Coalition for Clean Air ("CCA") identifies an additional reason to protect reliable and efficient rail service: its role in reducing truck traffic and lowering emissions. CCA supports policies and infrastructure investment that reduce air pollution. Its letter urges the Board to carefully review ABL's proposed transaction to confirm that ABL's transition plan will allow a safe and efficient transition of freight operations from PHL to ABL without a service disruption.

PHL respectfully requests that the Board (i) require ABL to submit a detailed transition plan addressing the issues set forth in PHL's October 21, 2026 letter; and (ii) closely scrutinize that plan together with comments submitted by affected stakeholders. The attached letters from the Port Shippers and CCA underscore the importance of these steps to protecting the supply chain in the United States.

Respectfully submitted,

/s/ William A. Mullins

William A. Mullins
Counsel for Pacific Harbor Line, Inc.

Attachments
cc: Parties of Record

Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company

FD 36946

Attachments

Epsilon Plastics, Inc.
of Sigma Plastics Group

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

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Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company, FD No. 36946

Dear Chief of Case Administration:

I am writing on behalf of Epsilon Plastics, Inc., to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15, 2026, in the above-referenced proceeding. The stay will enable the Board to carefully review the proposed transaction and ensure that the transition of operations from Pacific Harbor Line, Inc. ("PHL") to Alameda Belt Line ("ABL") is accomplished without a service disruption.

Epsilon Plastics is a plastic bag manufacturer, and we receive approximately 100 railcars of raw materials annually through the rail facilities and services affected by the proposed transaction. We rely heavily on seamless and reliable rail operations at the Reyes, CA, station.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that it will allow PHL to provide safe and efficient service before the transfer of service to ABL and allow ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars in commerce annually, it is essential that appropriate steps be taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review and determine that the essential flow of commerce will not be disrupted.

For these reasons, Epsilon Plastics respectfully requests that the Surface Transportation Board maintain the housekeeping stay and postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,

Jim Gifford
General Manager
Epsilon Plastics, Inc.
310-890-6221
jim.gifford@sigmaplastics.com

KONOIKE GROUP

Konoike

Chief of Case Administration

Office of Chief Counsel
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Dear Chief of Administration,

I am writing on behalf of Konoike Pacific California Inc to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15,2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL") will be accomplished without a service disruption.

Konoike Pacific California Inc is a shipper of frozen food utilizing the rail facilities and services impacted by the proposed transaction. We rely heavily on seamless, reliable rail operations at 1420 Coil Ave, Wilmington CA 90744, to move approximately 100 rail carts annually.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that the plan will allow PHL to provide safe and efficient service prior to the transfer of service to ABL, and will all ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars of commerce annually, it is essential that appropriate steps are taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review determine that the essential flow of commerce will not be disrupted.

Konoike Pacific California, Inc.
1420 Coil Ave., Wilmington CA 90744 * Ph. 310-518-1000 * Fax 310-518-3900
www.kpaccoldstorage.com

KONOIKE GROUP

Konoike

For these reasons, Konoike Pacific California Inc respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,

Richard Burke

President and Chief Operating Officer
Konoike Pacific California Inc
W/ 310-522-1912
M/ 323-270-1550
E/ rburke@kpaccoldstorage.com

L.A. GRAIN

October 20, 2026

Chief of Case Administration

Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

RE: Support for Petition for Housekeeping Stay
Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company, FD No. 36946

Dear Chief of Administration,

I am writing on behalf of Los Angeles Harbor Grain Terminal, LLC to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15,2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL") will be accomplished without a service disruption.

Los Angeles Harbor Grain Terminal is a shipper of agricultural products utilizing the rail facilities and services impacted by the proposed transaction. We rely heavily on seamless, reliable rail operations at our facility to handle and export products through the Ports of Los Angeles and Long Beach where we move approximately 5000 railcars and 400,000 tons of freight annually.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that the plan will allow PHL to provide safe and efficient service prior to the transfer of service to ABL and will all ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars of commerce annually, it is essential that appropriate steps are taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review to determine that the essential flow of commerce will not be disrupted.

For these reasons, Los Angeles Harbor Grain Terminal, LLC respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,



Hon. Dwight Roboinson
President and CEO
Los Angeles Harbor Grain Terminal, LLC
562-595-7559 x223 (Office)
562-477-6253 (Mobile)
drobinson@lagrain.com

Chief of Case Administration

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Dear Chief of Administration,

I am writing on behalf of SA Recycling LLC to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15,2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL")will be accomplished without a service disruption.

SA Recycling, LLC is a shipper of Metal Recycling and Iron Ore utilizing the rail facilities and services impacted by the proposed transaction. We rely heavily on seamless, reliable rail operations at Los Angeles and Long Beach facilities to move approximately 2,100 Cars of Metal Recycling and 2,250 cars of Iron Ore in 2026 as of today of freight annually.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that the plan will allow PHL to provide safe and efficient service prior to the transfer of service to ABL, and will all ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars of commerce annually, it is essential that appropriate steps are taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review determine that the essential flow of commerce will not be disrupted.

For these reasons, SA Recycling, LLC respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,



SILVANA JONES

Logistics Director

SA Recycling, LLC
Sjones@sarecycling.com /562-522-2538

October 22, 2026

Chief of Case Administration

Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

RE: Support for Petition for Housekeeping Stay
Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company, FD No. 36946

Dear Chief of Administration,

I am writing on behalf of Linde Inc. to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15,2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL") will be accomplished without a service disruption.

Linde Inc. is a shipper of industrial gases utilizing the rail facilities and services impacted by the proposed transaction. We rely heavily on seamless, reliable rail operations at Wilmington, California.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review to determine that the essential flow of commerce will not be disrupted.

For these reasons, Linde Inc. respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,

David LeValley

David LeValley

Associate Director, Productivity –West Region

Linde
Office: 562-983-2175 **email: David.levalley@linde.com**

Chief of Case Administration

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Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

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Alameda Belt Line – Operation Exemption – Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company, FD No. 36946

Dear Chief of Administration,

I am writing on behalf of **WWL Vehicle Services Americas, Inc.** to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15,2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL")will be accomplished without a service disruption.

WWL Vehicle Services Americas, Inc. is a shipper of **Automobiles** utilizing the rail facilities and services impacted by the proposed transaction. We rely heavily on seamless, reliable rail operations at **Wilmington, CA** to move approximately **5,205 carloads** of freight annually.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that the plan will allow PHL to provide safe and efficient service prior to the transfer of service to ABL and will all ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars of commerce annually, it is essential that appropriate steps are taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review to determine that the essential flow of commerce will not be disrupted.

For these reasons, **WWL Vehicle Services Americas, Inc.** respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,

Wayne Washington
SVP Logistics Americas
WWL Vehicle Services Americas, Inc.
Wayne.Washington@walwil.com

Chief of Case Administration

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Washington, DC 20423-0001

RE: Support for Petition for Housekeeping Stay
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Dear Chief of Administration,

I am writing on behalf of the Coalition for Clean Air to express our support for the housekeeping stay issued by the Surface Transportation Board on October 15, 2026, in the above-referenced proceeding, which will enable the Board carefully to review the proposed transaction to ensure that the transition of operations from Pacific Habor Line, Inc. ("PHL") to Alameda Belt Line ("ABL") will be accomplished without a service disruption.

The Coalition for Clean Air supports policies and infrastructure investments that reduce air pollution, improve public health, and transitions the freight sector to cleaner operations. We closely monitor rail, port, and the goods movement sector throughout California, particularly in communities impacted by freight activity. Reliable and efficient rail service can play a critical role in reducing truck traffic, lowering emissions, and advancing regional and state clean air goals.

A housekeeping stay will provide the Board with an opportunity to review the proposed transition plan and confirm that the plan will allow PHL to provide safe and efficient service prior to the transfer of service to ABL and will allow ABL to provide safe and efficient service after the transition. Given that the Ports of Los Angeles and Long Beach handle hundreds of millions of dollars of commerce annually, it is essential that appropriate steps are taken to avoid a service disruption, which could have serious adverse impacts on the supply chain in the United States.

The temporary housekeeping stay issued by the Board on October 15, 2026, will allow the Board to complete an orderly review to determine that the essential flow of commerce will not be disrupted.

For these reasons, the Coalition for Clean Air respectfully requests that the Surface Transportation Board keep the housekeeping stay to postpone the effective date of the transaction pending further review by the Board.

Respectfully submitted,

Dori Chandler

Policy Advocate
Coalition for Clean Air
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