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June 20, 2018
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VIA E-FILING

Cynthia T. Brown, Chief
Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, SW Washington DC
20423-0001

Re: FD 36178, Metropolitan Council - Petition for Declaratory Order

Dear Ms. Brown:

Ceres Global Ag Corp (Ceres) hereby files these comments in response to the Surface Transportation Board's ("Board or STB") May 22, 2018 decision permitting public comments on the Petition for Declaratory Order ('Petition') filed on April 4, 2018 by the Metropolitan Council ('Met Council'). In that Petition, Met Council requests that the Board find that certain proposed transactions involving Met Council, Hennepin County Regional Railroad Authority ('HCRRA') and Soo Line Railroad Company d/b/a Canadian Pacific ("CP") would not require Surface Transportation Board ("Board" or "STB") authorization and would not result in Met Council becoming a rail common carrier.

Most relevant to Ceres is the Board's request for comments on whether operational impacts on Twin Cities & Western Railroad Company ("TCW") should be considered as part of the Board's analysis. By e-filed letter dated June 14, 2018, Consolidated Grain & Barge Company (CGB), Ceres' partner in its Savage Riverport, LLC joint venture, submitted a thorough and detailed comment urging that the answer to that question be "yes." By this filing, Ceres' hereby expresses its firm support of the position expressed by CGB in its letter to the Board.

Like CGB, Ceres is an active shipper on TCW's line, which serves Savage Riverport, LLC's facility at Savage, MN ("Riverport Facility"). As such, Ceres shares CGB's operational concerns, namely that (i) the Southwest Light Rail Project's ("Project") 4-year construction process may result in service interruptions for the reasons articulated by CGB (track realignment and safety issues), and (ii) Met Council plans to remove sidetracks used by TCW that are an integral component of TCW service to the Riverport Facility, without funding and implementing a plan to construct replacement sidetracks before the existing ones are removed.

Like CGB, Ceres supports the light rail project but not at the expense of its freight needs, and not at the risk of the adverse operational and safety impacts mentioned above and addressed in greater depth in CGB's prior comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe Furbush", written in a cursive style.

Joe Fiereck
Logistics Manager
Ceres Global Ag Corp.

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June 19, 2018

CERTIFICATE: OF SERVICE

I hereby certify that I have served a copy of these comments via prepaid first class mail to all parties of record in this proceeding by more expeditious means of delivery.

Dated this 19th day of June, 2018.