

BEFORE THE
SURFACE TRANSPORTATION BOARD

ENTERED
Office of Proceedings
July 14, 2017
Part of
Public Record

PORTLAND VANCOUVER JUNCTION RAILROAD, LLC--OPERATION--
RAIL LINES OF COLUMBIA BUSINESS CENTER, CLARK COUNTY,
WASHINGTON

FINANCE DOCKET NO. 36134

SUPPLEMENT TO NOTICE OF EXEMPTION
UNDER 49 C.F.R. § 1150.41

On July 5, 2017, Portland Vancouver Junction Railroad, LLC, filed its notice of exemption. In its notice, Portland Vancouver requested the Board to permit consummation of the Agreement on July 31, 2017. In seeking this relief, the parties note that extensive negotiations to reach a final agreement, which were undertaken to address various operational issues that impacted shippers, culminated with Portland Vancouver agreeing to start operations on August 1, 2017. Although Portland Vancouver signed the Agreement on Friday, June 30, unfortunately, the fully executed Agreement was not executed until the following Monday, July 3. Then, the 4th of July holiday delayed Portland Vancouver's ability to file prior to the 5th of July.

Aside from the foregoing, this request is based on several factors that warrant the relief requested. In the first place, the Board is requested to note that this line of railroad generates a substantial number of cars per day, a fact that is supported by the need to perform switching services twice per day

during the week and once per day on weekends. Due to the limited storage space and the need to carefully coordinate interchange with BNSF, a gap of five (5) days in service, would disrupt the shippers' daily operations and result in the accumulation of unnecessary demurrage charges, something that Portland Vancouver is seeking to eliminate. An extension would unquestionably alleviate the potential for demurrage charges that could adversely impact shipper/carrier relationships in the future.

Second, and equally important, a five-day delay in Portland Vancouver's ability to commence service on August 1, 2017, could exacerbate past problems and impact operations at BNSF's Vancouver Yard. In turn, this could possibly have a temporary impact on freight rail service between Portland and Seattle, as well as the ports of Tacoma and Seattle. In addition, it could adversely affect Amtrak operations.

Given the foregoing, it is respectfully suggested that good reason exists to permit consummation on July 31, 2017 as requested.

Respectfully submitted,

/s/ Richard H. Streeter

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