

CHARLES H. MONTANGE  
ATTORNEY AT LAW  
426 NW 162ND STREET  
SEATTLE, WASHINGTON 98177

(206) 546-1936  
FAX: (206) 546-3739

14 May 2021  
For E-Filing

302339

ENTERED  
Office of Proceedings  
May 14, 2021  
Part of  
Public Record

Ms. Cynthia T. Brown  
Chief, Section of Administration  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

Re: North Coast Railroad Authority – Abandonment  
Exemption -- in Mendocino, Trinity and Humboldt Counties,  
CA, AB 1305X

Notice of Exemption for Abandonment/Railbanking

Fee tendered to facilitate filing of the Notice of Exemption but  
fee exemption/waiver requested pursuant to 49 C.F.R.  
1002.2(e)

Dear Ms. Brown:

This letter and accompanying Notice of Exemption is submitted on behalf of North Coast Railroad Authority ("NCRA"), the abandonment applicant in this proceeding, and a public agency of the State of California.

1. NCRA submits herewith a Notice of Exemption pursuant to 49 C.F.R. 1152.50 for a portion of its rail lines in Mendocino County and all of its lines in Trinity and Humboldt Counties in California. Under separate cover letter, NCRA has also submitted a "statement of willingness to assume financial responsibility" pursuant to 49 C.F.R. 1152.29 and 16 U.S.C. 1247(d) seeking the issuance of a Notice of Interim Trail Use ("NITU") for all lines covered in this proceeding. In the cover letter for that separate submission, NCRA has consented to railbanking and outlined a process for expedited issuance of a "Notice of Interim Trail Use."

FILED  
May 14, 2021  
SURFACE TRANSPORTATION  
BOARD

1

FEE RECEIVED  
May 14, 2021  
SURFACE  
TRANSPORTATION BOARD

2. NCRA notes that section 1152.50 abandonments are generally subject to appropriate offers of financial assistance (“OFA’s”). NCRA does not believe any appropriate OFA can be made in this proceeding for a variety of reasons. NCRA accordingly reserves the right to seek dismissal of any OFA which it regards as inappropriate.

3. NCRA views this line as suitable for alternative public use as that term is used in 49 U.S.C. 10905, and in the event of abandonment authorization/ railbanking, NCRA intends to preserve the line for interim trail use and other compatible public uses, or transfer it to a suitable alternative agency (consistent with directives from the California legislature and the authority of this Board) for interim trail use and other compatible public purposes. In light of this commitment, NCRA does not view a “public use condition” pursuant to section 10905 as necessary in this proceeding to protect the corridor for public use, but NCRA likely will not oppose reasonable conditioning that does not interfere with current public purposes intended for the line in question.

4. In order to expedite filing of this Notice of Exemption, NCRA has tendered the filing fee (\$4600), but requests the agency to waive this fee. NCRA is a public agency of the State of California. Although it is owner of a rail line and is itself subject to embargoed common carrier obligations, this line has not been operated due to a Federal Railroad Administration (“FRA”) embargo since 1998. Prior to that time, the line was operated by a long defunct lessee whose lease also long ago expired. NCRA derives no revenue from rail operations, has no rail operations, depends on discretionary appropriations from the California legislature for operations, borrows staff from Sonoma County government, and a recent report [by California Department of Transportation (“Caltrans”) and other agencies for the California State Transportation Agency (“CalSTA”)] found that NCRA’s obligations exceeded its cash, receivables and other current assets by \$7,239,933. See “Assessment of the North Coast Railroad Authority and Viability of a Great Redwood Trail: Report to the Legislature” at p. 21 (2020) (the referenced report is available at <https://calsta.ca.gov/subject-areas/reports> as the first entry under the SB 1029 tab). In response to the unsuccessful rail history of these lines including the prolonged FRA embargo, the California Legislature adopted SB 1029 in 2018 modifying NCRA’s organic statute to encourage railbanking of the portion of NCRA’s lines involved here. In essence, NCRA as a public agency of the State is acting here on behalf of the State. Under the circumstances, NCRA requests this Board to waive (refund) the filing fee for this Notice of Exemption pursuant to 49 C.F.R. 1002.2(e)(1), or -- for reasons of best interest of the public as well as undue hardship -- 1002.2(e) (2).



By my signature below, I certify service by posting a copy of this pleading with USPS on the date of this letter, postage pre-paid, first class addressed to all persons on the service list, which to date is limited to NCRA and David Schonbrunn (Transdef Pres.), P.O. Box 151439, San Rafael, CA 94915.

Thank you for your assistance in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Charles Montange', written over a horizontal line.

Charles Montange  
for North Coast Rail Authority

Att: NOE

cc (all with attachment): Mitch Stogner (NCRA) (by email)  
Elizabeth Coleman, Esq. (for NCRA) (by email)  
David Schonbrunn (Transdef)

BEFORE THE SURFACE TRANSPORTATION BOARD

North Coast Railroad Authority – )  
Abandonment Exemption – ) AB 1305X  
In Mendocino, Trinity and Humboldt Counties, CA )

VERIFIED NOTICE OF EXEMPTION

North Coast Railroad Authority (“NCRA”) files this Verified Notice of Exemption (“NOE”) pursuant to the two-year out-of-service class exemption at 49 C.F.R. 1152.50 for authority for NCRA to abandon approximately 175.84 miles of rail line and branches, set forth in the map attached as Exhibit A, between railroad milepost 139.5 at Commercial Street in Willits, to railroad milepost 267.72 near Carlotta, milepost 300.5 near Samoa, and milepost 301.8 near Korbex,<sup>1</sup> inclusive of Eureka at milepost 284.1 and Korbex at milepost 295.57, in Mendocino, Trinity and Humboldt Counties, California (hereinafter “the Line”).

The line has been subject to an embargo imposed by the Federal Railroad Administration in 1998. No local rail traffic has moved over the Line during the past two years or, indeed, since the embargo. Similarly, there is and has been no

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<sup>1</sup> This NOE thus encompasses NCRA’s Arcata & Mad River (or “Annie and Mary”) subsidiary, MP 295.57 near Korbex for approximately 6.23 miles to MP 301.8 near Korbex. As explained in Exhibit B, NCRA believes this Board has jurisdiction over the Annie and Mary and does not wish to leave behind a “stranded segment.”



overhead traffic on the Line and thus nothing to reroute. Thus, any overhead traffic can be rerouted. There is no formal complaint filed by a user of rail service on the line (or a state or local government entity acting on behalf of a shipper) regarding cessation of service over the line that is pending either at the Surface Transportation Board (“STB” or “Board”) or any U.S. District court, nor has any such Complaint been decided in favor of the Complainant within the past two years.

NCRA intends to preserve the Line for possible future rail reactivation and for use as part of The Great Redwood Trail pursuant to 16 U.S.C. 1247(d) and the “Notice of Interim Trail Use” (NITU) process, and for other compatible public purposes, which may include possible excursion rail with trail use in the Humboldt Bay area.

NCRA is an agency of the State of California.

1. Proposed consummation date. July 6, 2021.
2. Certification required by 49 C.F.R. 1152.50(b). See Exhibit C.
3. Information required by 49 C.F.R. 1152.22(a)(1) through (4), (7), and (8), and (e)(4).

(a) General.

- (1) Exact name of applicant. North Coast Railroad Authority.

(2) Whether applicant is a common carrier by railroad subject to 49 U.S.C. Subtitle IV, Chapter 105. NCRA is a common carrier by railroad subject to 49 U.S.C. Subtitle IV, Chapter 105.

(3) Relief sought. NCRA seeks to use the class exemption at 49 C.F.R. 1152.50 to abandon approximately 175.8 miles of rail line between MP 139.5 at Commercial Street in Willits, to MP 267.72 near Carlotta, MP 300.5 near Samoa, and MP 301.8 near Korbel, inclusive of Eureka at MP 284.1 and Korblex at MP 295.57, in Mendocino, Trinity and Humboldt Counties, California.

NCRA also seeks to “railbank” the line pursuant 16 U.S.C. 1247(d) and the NITU process and is filing requisite papers to this end separately.

(4) Map. See Exhibit A.

(7) Name, title and address of representative of applicant to whom correspondence should be sent. Charles H. Montange, Law Offices of Charles H. Montange, 426 NW 162<sup>nd</sup> St., Seattle, WA 98177, (206) 546-1936, [c.montange@frontier.com](mailto:c.montange@frontier.com).

(8) List of all United States Postal Service ZIP Codes that the line proposed for discontinuance traverses. The line traverses the following U.S. Postal Zip Codes: 95429, 95595, 95454, 95542, 95560, 95559, 95553, 95571, 95569, 95565, 95562, 95540, 95551, 95537, 95564, 95524, 95521, 95519, 95525, 95521, 95524, 95501, 95503, 95526, 95514, 95511, and 95490.

(e) Rural and community impact.

(4). Statement of whether the properties proposed to be abandoned are appropriate for use for other public purposes, including roads and highways, other forms of mass transportation, conservation, energy production or transmission, or recreation. Based on the history of the Line, and actual experience since 1992, NCRA believes that operation of the Line in and around the Eel River Canyon was extremely challenging due to the unstable soils and other terrain features. These and features elsewhere on the Line rendered the Line unreliable, and too costly to maintain (due inter alia to frequent tunnel fires, flood events, and soil movement) for competitive freight rail operations. NCRA further notes that the Line was constructed and initially operated for railroad purposes (chiefly to service the timber industry in the Eureka area) prior to the adoption of NEPA, CEQA or modern environmental law generally. However, NCRA believes the Line is appropriate for other public purposes, including conservation, recreation, and the proposed Great Redwood Trail.

NCRA believes that the property may be subject to reversionary interests that may affect transfer of the corridor for non-rail purposes. NCRA intends to railbank the property pursuant to 16 U.S.C. 1247(d) consistent with preserving it for conservation and recreation uses.

4. The level of labor protection. The interests of any railroad employees who may be adversely affected by the proposed abandonment will be adequately protected by the labor protective conditions in Oregon Short Line R. Co. – Abandonment – Goshen, 360 ICC 91 (1979).

5. Certification. Certificates of compliance with the notice requirements of 49 C.F.R. 1152.50(d)(1) and 1105.11 are attached in Exhibit D.

6. Environmental Report. See Exhibit E.

7. Historic Report. See Exhibit E.

All comments received to date on the combined ER/HR (Exhibit E) are attached as Exhibit E Addendum at the end of Exhibit E.

Respectfully submitted,

c/ Charles H. Montange

Of counsel: Elizabeth Coleman, Esq.  
Deputy County Counsel  
Office of the County Counsel  
Sonoma County  
County Administration Center  
575 Administration Drive, Room 105A  
Santa Rosa, CA 95403  
707-565-2421  
Fax –2624  
Of counsel for North Coast Railroad  
Authority

Charles H. Montange  
Law Offices of Charles H. Montange  
426 NW 162<sup>nd</sup> St.  
Seattle, WA 98177  
(206) 546-1936  
fax --3739  
Rail counsel for North Coast Railroad  
Authority



Exhibit A – Map

Exhibit B – Annie and Mary subsidiary information

Exhibit C – 1152.50(b) Verification and Certification

Exhibit D -- Combined 1150(d)(1) Certificates of Service and Publication

1105.7, 1105.8(c) and 1105.11 Certification of Service

Exhibit E – Combined ER/HR and Exhibit E Addendum (comments received to  
date: Friends of the Eel River, Rails to Trails Conservancy, and  
Humboldt County)

Exhibit A

Map

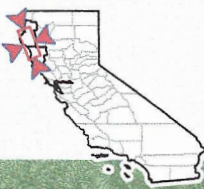


# NCRA Main Line

## From Willits North to Eureka

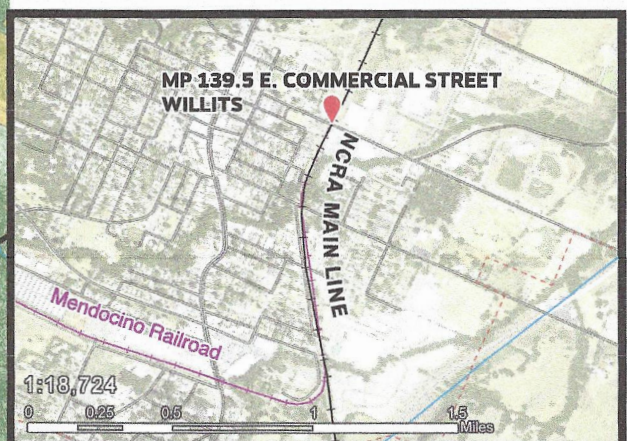
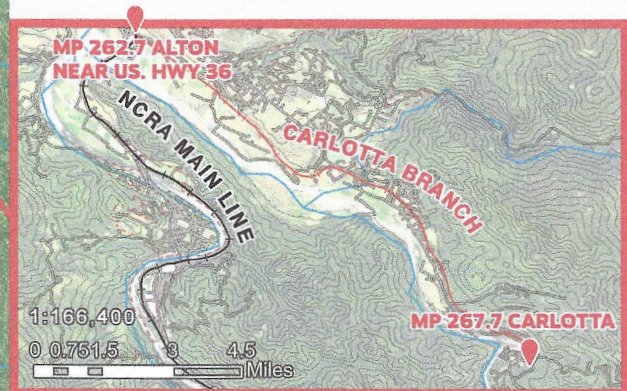
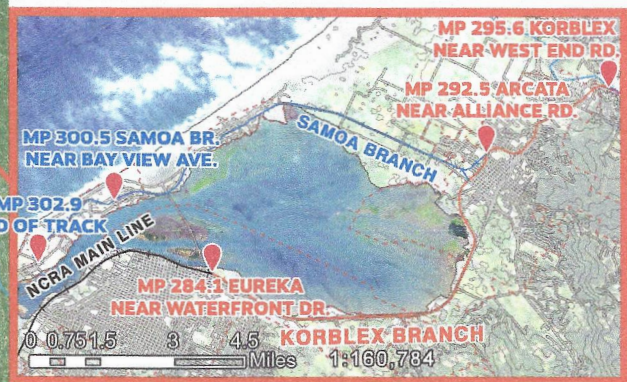
Including Branches and A&MR Subsidiary

### LOCATION



### LEGEND

- County Line
- River or Creek
- Land Contours (50m)
- U.S. Route 101
- State Highway
- Road
- Railroad
- Park Land
- Reservations
- City Boundary
- Milepost Marker



North American Datum of 1983 (NAD83)

Last Updated: September 2020  
Cartographer: Leo J. DiPierro

This map is not a legal document. Some features may be generalized for map scale. Data acquired from ESRI, CA Open Data Portal, California Department of Transportation, USGS, Humboldt County GIS, U.S. Census, Berkeley Library Geodata, DataBasin.



Exhibit B

(also found as Exhibit B in ER/HR)

Korblex to Korbel (Annie and Mary)

## Exhibit B: Arcata & Mad River Jurisdictional Issue

NCRA includes the Arcata & Mad River ("Annie and Mary") subsidiary in this Notice of Exemption proceeding to the extent STB concurs with NCRA that the Annie and Mary is a line subject to the agency's abandonment jurisdiction and is not a "spur" outside the agency's jurisdiction. Consistent with Resolution 2008-11 (attached as B-1), NCRA views the Annie and Mary as subject to the agency's abandonment jurisdiction, taking the position that NCRA and its predecessor Eureka Southern used the line for common carrier purposes and NCRA now appropriately should seek and receive abandonment authorization.

NCRA acknowledges that ICC authorized the Arcata & Mad River Rail Road Company line for abandonment in Arcata and Mad River Rail Road Company – Abandonment Exemption – in Humboldt County, AB 241X, served April 9, 1985, 1985 ICC Lexis 467, stay denied 1985 ICC Lexis 385 (May 24, 1985), reconsideration denied 1986 ICC Lexis 382 (March 19, 1986). However, at that time, the Eureka Southern Railroad ("Eureka Southern") was expressing interest in acquiring Annie and Mary, and subsequently did acquire it from its then owner, Simpson Timber Company, while Eureka Southern was in bankruptcy.<sup>1</sup> NCRA

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<sup>1</sup> Eureka Southern evidently expected to enter into a haulage agreement with Simpson Lumber to pay for the purchase, transporting freight from Korbel to the mainline by rail rather than truck. "Judge Clears Way for Sale of AMRR," news

subsequently acquired Eureka Southern out of bankruptcy in 1992. Both Eureka Southern and NCRA operated the Annie and Mary for freight rail purposes to serve two lumber companies until 1994,<sup>2</sup> and former railroad personnel around at the time have orally stated to NCRA consultants that FRA ordered the line shutdown for safety reasons.<sup>3</sup> Two relevant NCRA Time Tables (1993 and 1996) both include Annie and Mary stations on NCRA's Eureka Line, although the 1996 Time Table notes third page, item 9) Korblex to Korbel (i.e., Annie and Mary) by 1996 was out of service.<sup>4</sup> Annie and Mary thus was used for line hauls into and out of Blue Lake and Korbel at least through 1993-94. As part of its acquisition of its rail line south of Willits in 1996, NCRA applied for and received substantial

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clipping dated 8/9/87 from Humboldt State Univ. library, collection of Josh Buck, Exhibit B-2.

<sup>2</sup> For Eureka Southern operations, see Jim Shaw, *Shortlines of Northern California*, Vol. I, at p. 90 (2019) (Eureka Southern locomotive No. 70 – former California Traction company – pulling a string of flat cars to mill at Korbel for loading in 1990). For operations after NCRA's 1992 acquisition of Eureka Southern, see photographs in Exhibit B-3 from collection of Josh Buck (copied with permission of the photographer(s)). The third photo shows the same engine portrayed in Shaw, *supra*, in operation for NCRA.

<sup>3</sup> According to Frank Lovio (Roadmaster for the railroad during the 93-94 period, see 1993 Time Table, Exhibit B-4, *infra*), Mr. Lovio was on site with an FRA inspector when an engine pulling four lumber cars crossed the Warren Creek Bridge on Annie and Mary. They both “watch[ed] the bridge shake back and forth,” the FRA inspector backed into a barbed wire fence to reach safety if it collapsed, and NCRA stopped running the train afterward. Interview of Frank Lovio by Josh Buck, 9 December 2017. Mr. Lovio believed the lumber mills caused the problem by overloading the flats. *Id.*

<sup>4</sup> Relevant portions of the 1993 and 1996 Time Tables are attached in Exhibit B-4.



rehabilitation grants, of which \$4.5 million was intended to rehabilitate the Annie and Mary.<sup>5</sup> Annie and Mary track was removed, but Mr. Hauser (director of the NCRA's railroad) represented that rail replacement would occur in 18 to 24 months.<sup>6</sup> The rehabilitation funds were necessarily diverted to repair storm damage to the mainline in the 1996-97 period.<sup>7</sup> In 1998, essentially the entire central and northern portion of the NCRA system was embargoed, so rehabilitation of Annie and Mary did not take place.

In its reconsideration decision in the Annie and Mary abandonment proceeding, ICC noted that certain issues raised by the rail labor interests in connection with Eureka Southern acquisition of Annie and Mary would be addressed should Eureka Southern actually apply to the agency for acquisition authority.<sup>8</sup> NCRA can find no record that Eureka Southern, which was in bankruptcy, applied for such authority for its acquisition, which was during the 1987-88 time period. However,

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<sup>5</sup> "A&MR Key to New NWP Success," The Headlight, August 1995, clipping from Humboldt State Univ. library, collection of Josh Buck; "Deal Final in Purchase of Rail Line," Ukiah Daily Journal 20 April 1996 (both in Exhibit B-5).

<sup>6</sup> "Railroad Starts Work on Tracks," Eureka Times Standard, collection of Josh Buck, Exhibit B-6.

<sup>7</sup> "Rail Replacement Wait May Be Long", 12/7/1997 news clipping, collection of Josh Buck, Exhibit B-7 (Hauser indicates diversion of rehab funds was with concurrence of the federal government and the two shippers – Simpson and Blue Lake Forest Products).

<sup>8</sup> 1986 ICC Lexis 382 (March 19, 1986) at p. \*11.



the evidence is consistent with a resumption of common carrier operations on the line subsequently by Eureka Southern.

NCRA adopted Resolution 2008-11 (August 13, 2008) (Exhibit B-1) stating that it “acquired [Annie and Mary] as an operating Rail Road and continued to operate the ... Line and never took formal action to abandon the ... Line even during the period of non-use ....” However, as noted, by 2008, the entire northern portion of the line was embargoed, and the Resolution accordingly indicated that it was “unlikely and infeasible that the NCRA will operate trains on the [Annie and Mary] roadbed in the near future....” The Resolution stated that it was “appropriate that NCRA retain the right to resume rail freight service on the [Annie and Mary] route, if possible, should the need for such service arise....” The Resolution pledged the agency to cooperate with City of Blue Lake and others in “railbanking” the line “including filing an appropriate application with the Surface Transportation Board....” The resolution has not been rescinded.

NCRA believes that the evidence concerning Annie and Mary is consistent with a determination that Simpson Lumber (the then-owner) did not consummate the abandonment, but instead transferred the line to Eureka Southern for continued rail operation, which continued under NCRA. In that case, Eureka Southern should have sought acquisition authority but did not. However, due to use for common carrier purposes by Eureka Southern and by NCRA, STB retains abandonment

jurisdiction over the Annie and Mary. Furthermore, NCRA in accordance with Resolution 2008-11 must then seek abandonment/railbanking authority from this Board. NCRA also wishes to avoid a situation in which failure to include Annie and Mary in this proceeding constitutes a “stranded segment” problem that might hold up the remainder to the NCRA abandonment proceeding in this docket (AB 1305X).

NCRA is prudently laying out the facts above in the hope of avoiding disputes over agency jurisdiction that might delay the effectiveness of issuance of a railbanking order for any portion of the line that qualifies for an STB Notice of Interim Trail Use. NCRA seeks a NITU that covers the Annie and Mary. Should the agency view its jurisdiction as lapsed, NCRA plans to treat the Annie and Mary as eligible for at least “private” railbanking pursuant to Southern Pacific Transportation Company – Exemption – Abandonment of Service in San Mateo County, CA, AB 12 (Sub-no. 118X), served Feb. 20, 1991, 1991 ICC Lexis 54 at \*12 [spur outside ICC jurisdiction may be privately railbanked under the language of 16 U.S.C. 1247(d)], and other authorities.

NCRA in all events wishes to keep all of its lines intact and available for rail reactivation as well as trail use in the interim, consistent with 16 U.S.C. 1247(d), at the conclusion of this proceeding.

Exhibit B1 – NCRA Resolution 2008-11

Exhibit B2 – “Judge Clears Way for Sale of AMRR” (8/9/1987)

Exhibit B3 – NCRA Operations on Annie and Mary, 1993-94 (photographs)

Exhibit B4 – 1993 and 1996 Time Tables (relevant excerpts)

Exhibit B5 – “A&MR Key to New NWP Success” (8/1995);

“Deal Final in Purchase of Rail Line”

Exhibit B6 – “Railroad Starts Work on Tracks”

Exhibit B7 – “Rail Replacement Wait May be Long” (12/7/1997)

**Exhibit B1 – NCRA Resolution 2008-11**



**RESOLUTION**

**Of the**

**BOARD OF DIRECTORS**

**Of**

**NORTH COAST RAILROAD AUTHORITY**

**IN THE MATTER OF:**

Recognizing the Arcata and Mad River  
Railroad as Being Appropriate for  
Multi-Modal Transportation Use.

Resolution No. 2008 - 11

WHEREAS; The Arcata and Mad River Railroad's predecessor, the Union Wharf and Plankwalk Company, was incorporated on December 15, 1854, and operated a horse-drawn railroad, generally considered to be the first railroad in California; and

WHEREAS; the next operator, the Arcata Transportation Company, was incorporated on June 14, 1875, and converted the railroad to steam; and

WHEREAS; on July 29, 1881, the Arcata and Mad River Railroad (A&M) was incorporated; and

WHEREAS; in 1914, with the coming of the Northwestern Pacific Railroad (NWP) and the connection to the rest of the nation, the Arcata and Mad River Railroad agreed to the junction at Korblex, NWP post mile 295.57 (the north side of West End Road), as the division between the A&M and NWP; and

WHEREAS; the Eureka Southern Railroad had purchased the NWP and in September 1988 also purchased the A&M; and

WHEREAS; the Eureka Southern Railroad continued to operate trains on both systems but was forced into bankruptcy due to numerous factors; and

WHEREAS; the North Coast Railroad Authority (NCRA) was formed by the State of California; and

WHEREAS; after NCRA acquired the A&M Line it continued to run trains thereon until the A&M Line shut down due to safety concerns; and

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WHEREAS; the NCRA acquired the A&M Line as an operating Rail Road and continued to operate the A&M Line and never took formal action to abandon the A&M Line even during the period of non-use, nor does the NCRA consider the A&M Line abandoned; and

WHEREAS; the A&M roadbed is outside of the prospective contract limits of the NCRA agreement with the Northwestern Pacific Company; and

WHEREAS; it is unlikely and infeasible that the NCRA will operate trains on the A&M roadbed in the near future; and

WHEREAS; it is appropriate that NCRA retain the right to resume rail freight service on the A&M route, if possible, should the need for such service arise; and

WHEREAS; the cities of Arcata and Blue Lake and the County of Humboldt have expressed an interest in utilizing the A&M roadbed for a multi-modal transportation use.

NOW THEREFORE BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE NORTH COAST RAILROAD AUTHORITY as follows:

1. NCRA expresses its willingness to cooperate with the City of Blue Lake and others in railbanking, and/or other appropriate means of effectuating multi-modal transportation use of the A&M Line in its entirety from NWP mile post 295.57 (the north side of West End Road) to just east of Blue Lake and will cooperate with such process, including filing an appropriate application with the Surface Transportation Board, at such time as a local entity enters into an agreement with the NCRA to assume the duties of Trail Manager as required by federal law, or a local or non-profit entity assumes responsibility equivalent to that of Trail Manager, as required by federal law and NCRA's Guidelines for Trail Projects.
  2. This Resolution will remain in effect unless rescinded. The Board, in or after September 2009, may review this Resolution.
  3. The Executive Director of NCRA or the designee thereof, is NCRA's sole spokesman to any public agency regarding the subject matter of this Resolution, including, but not limited to the City of Blue Lake, the City of Arcata, the County of Humboldt, the
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Surface Transportation Board, the Department of Transportation, and/or the California  
Transportation Commission.

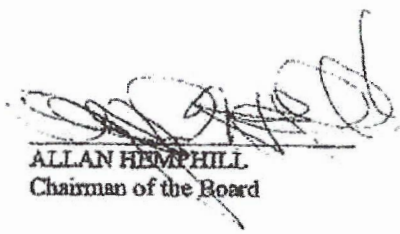
Introduced and adopted this 13<sup>th</sup> day of August 2008 at a regular meeting of the Board  
of Directors of North Coast Railroad Authority by the following vote:

AYES:

NOES:

ABSENT:

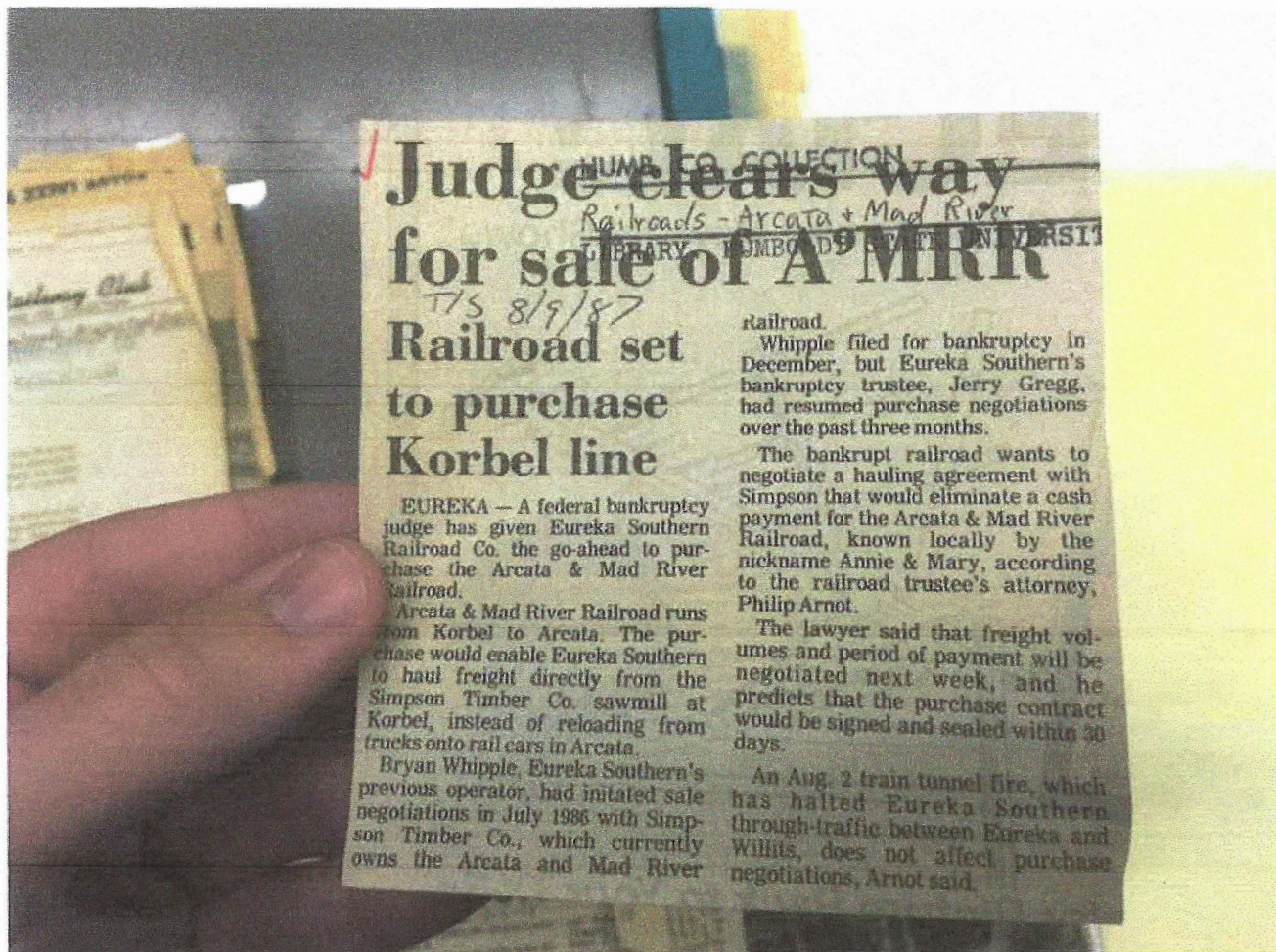
ATTEST:

  
ALLAN HEMPHILL  
Chairman of the Board

MITCH STOGER, Secretary

**Exhibit B2 – “Judge Clears Way for Sale of AMRR” (8/9/1987)**





**Exhibit B3 – NCRA Operations on Annie and Mary, 1993-94 (photographs)**

Photo A: A North Coast Railroad (NCR) freight on February 14, 1993, at the Warren Creek Crossing. Note that the locomotive is labeled as Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive can be found in the Eureka Rail Yard (as of 2021).

Bill Roberts Photo (all photos copyright but reprinted with his permission)

Photo B: A North Coast Railroad (NCR) freight on February 14, 1993, at the Warren Creek Crossing. Note that the locomotive is labeled as a Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive can be found in the Eureka Rail Yard (as of 2021).

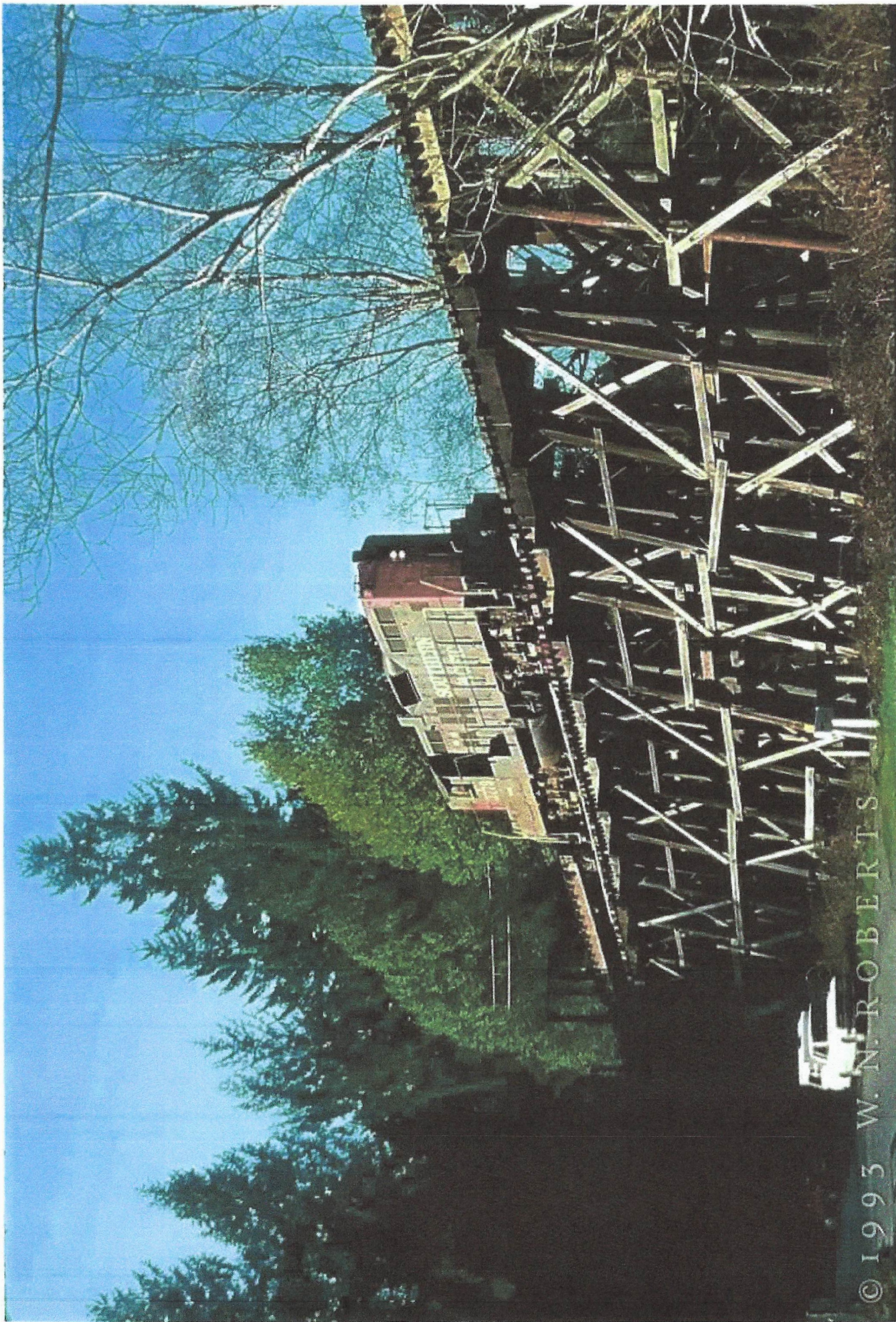
Bill Roberts Photo. Copyrighted, reprinted by permission.

Photo C: A North Coast Railroad (NCR) freight along West End Road in approximately on June 5th, 1992. Note that locomotive is labeled as Central California Traction No. 70. No. 70 was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive was scrapped onsite at the Eureka Yard in 2015. Bill Roberts Photo. Copyrighted, reprinted by permission.

Photo D: A North Coast Railroad (NCR) freight hauling over the Minor Creek trestle on February 14, 1993. Note that the locomotive is labeled as Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. Bill Roberts photo. Copyrighted, reprinted by permission.

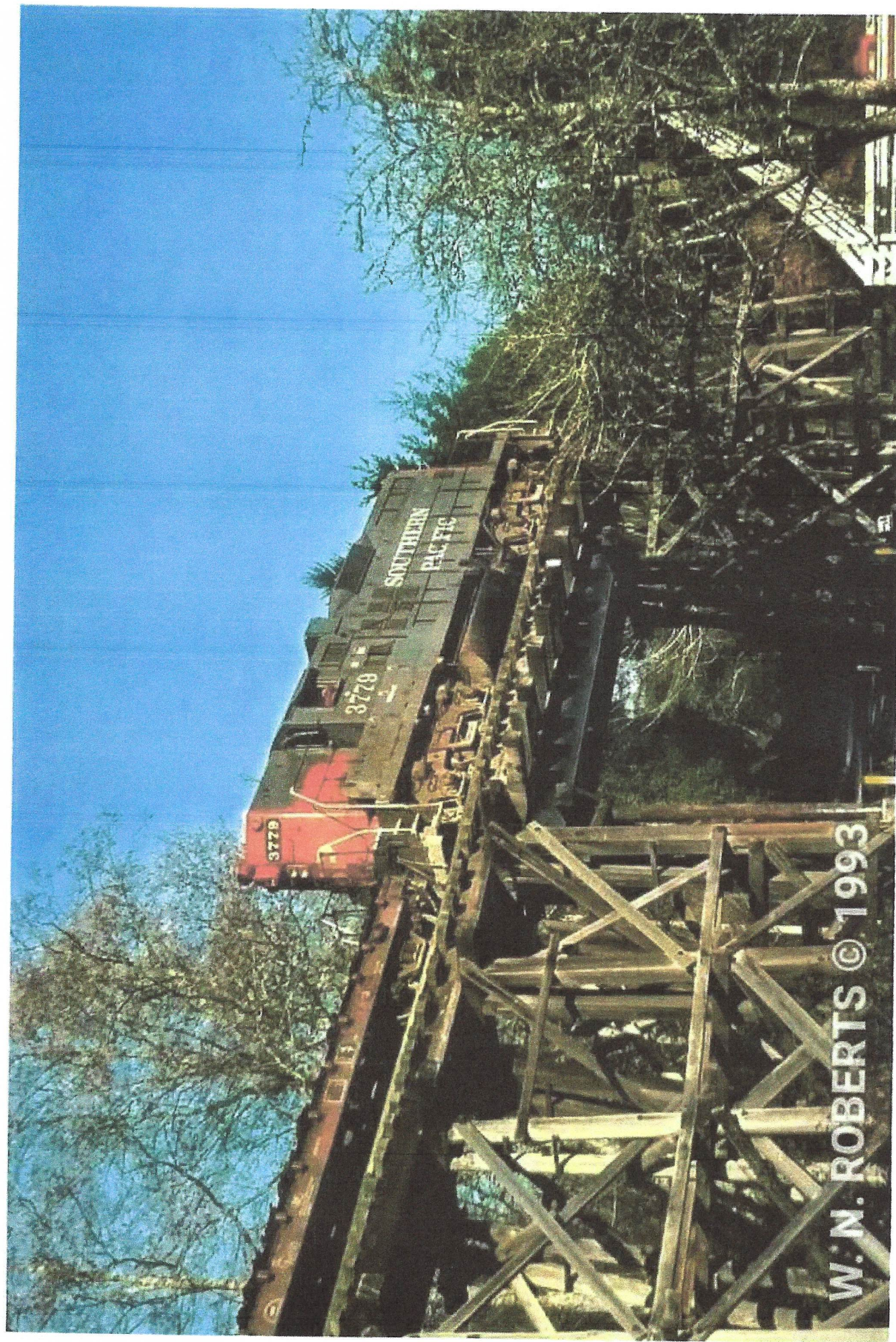
Photo E: A North Coast Railroad (NCR) freight pulling a train through the crossing across Maple Creek Road near the mill at Korbel on February 14, 1993. Note that the locomotive is labeled as a Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. Copyrighted, reprinted by permission.





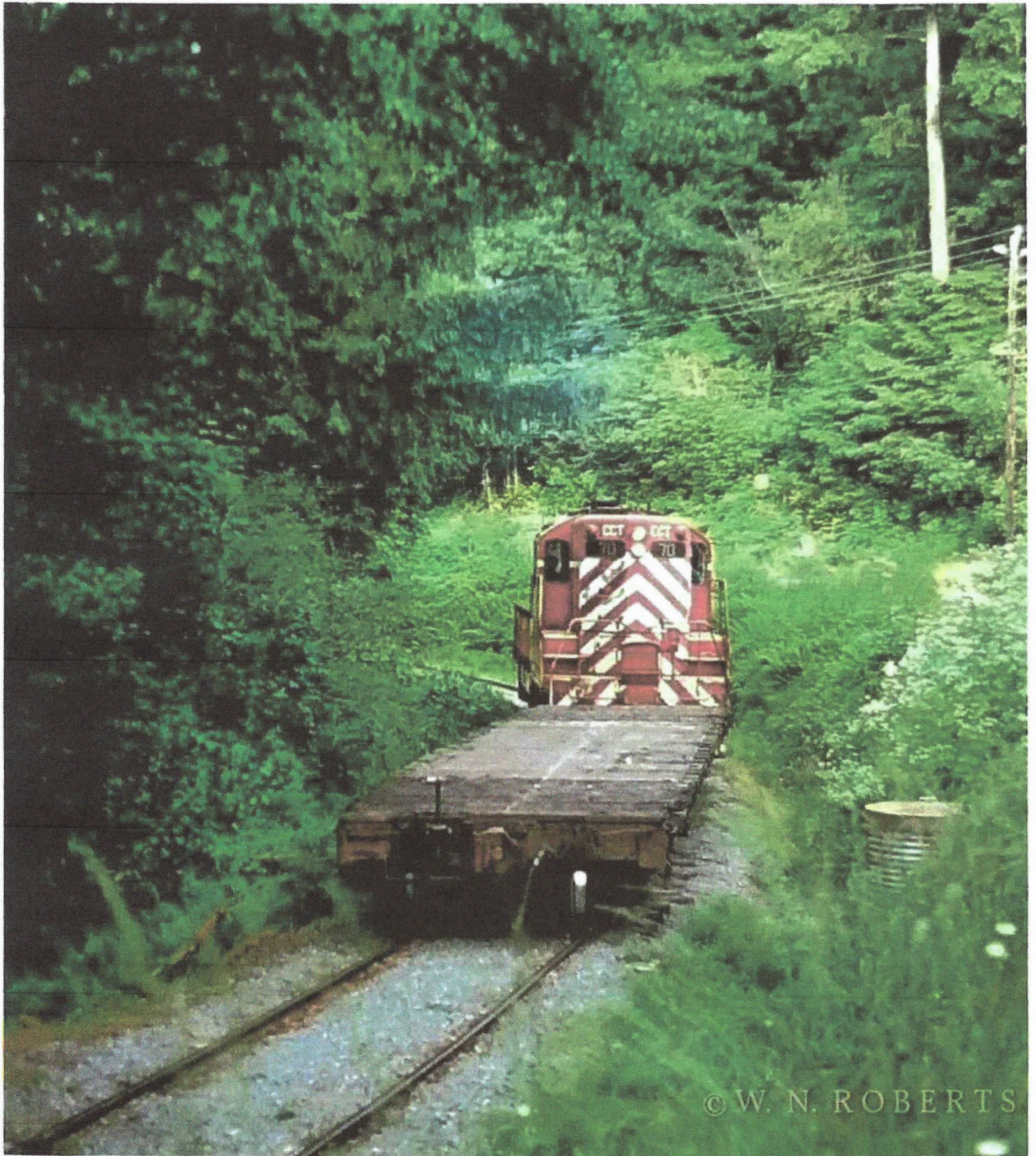
© 1993 W. N. ROBERTS





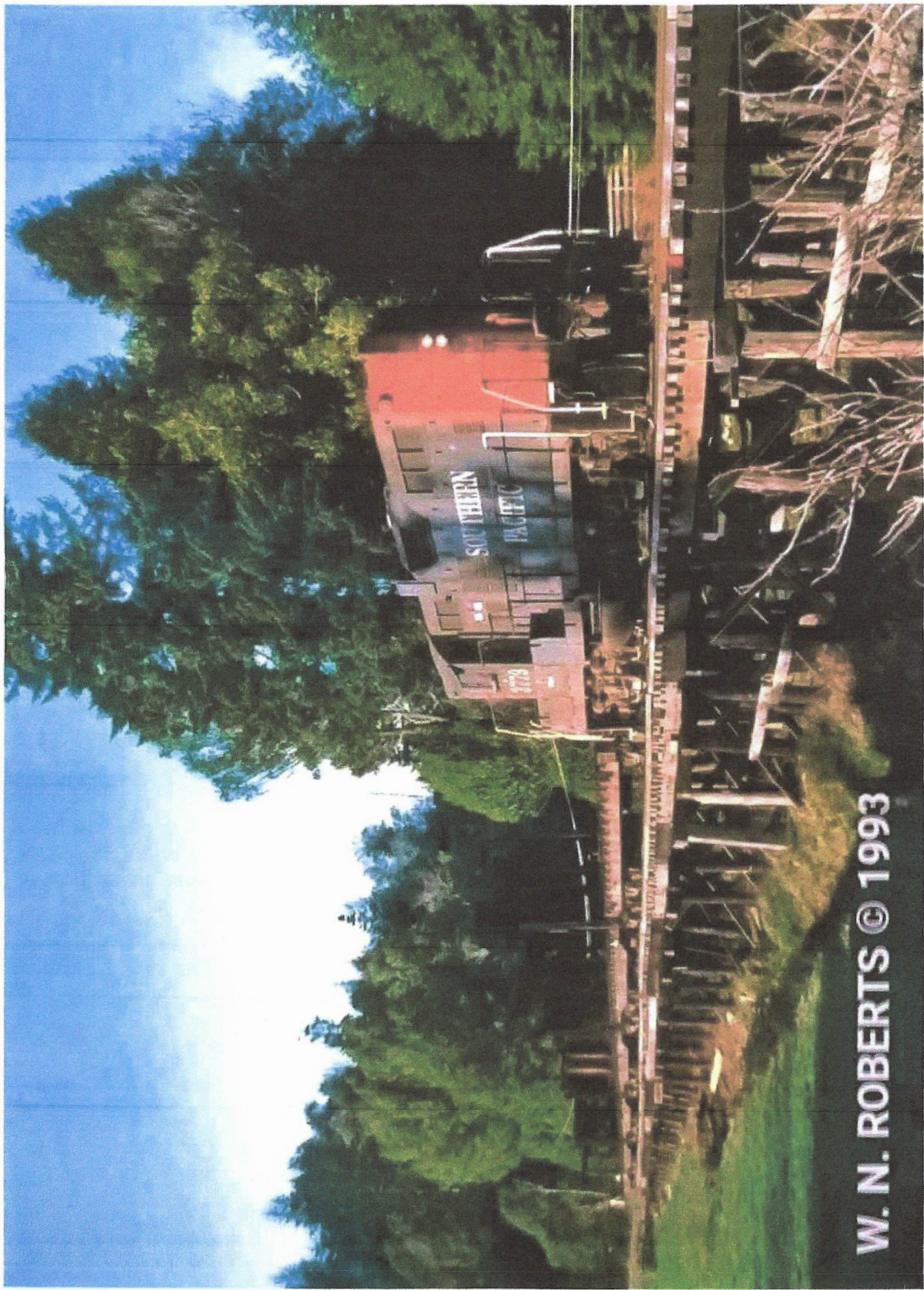
W. N. ROBERTS © 1993





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**Exhibit B4 – 1993 and 1996 Time Tables (relevant excerpts)**



**RULE 226. ABSOLUTE BLOCK REGISTER TERRITORY:**

New rule is added: Absolute block register territory will be designated in timetable. A register labeled "Absolute Block Register Territory" will apply only on that designated territory. A train or operator in charge of on-track equipment is authorized to occupy Absolute Block Register Territory under the following conditions:

1. Following information must be entered in register on the first blank line:

| Train or<br>on-track<br>equipment | Conductor or<br>MotW<br>employee | Date | Time<br>Territory<br>Occupied | Time<br>Territory<br>Cleared |
|-----------------------------------|----------------------------------|------|-------------------------------|------------------------------|
| A                                 | B                                | C    | D                             | E                            |

**COLUMN REQUIRED ENTRY**

- A- Enter the train identification or MotW and track equipment number.  
 B- Enter last name of conductor or operator in charge of on-track equipment.  
 C- Current date.  
 D- Time entry is made in register.

2. If the territory is occupied by a preceding train movement entry cannot be made on register until engineer of each preceding movement has been contacted and advised territory will be jointly occupied by a train. Maintenance of Way on-track equipment and/or another train, all train movements must be made at RESTRICTED SPEED prepared to stop short of men and equipment fouling the track within the territory.

E- Time territory cleared.

3. After movement has been completed, the time the territory was cleared must be entered in Column E. A line is then to be drawn through the entire entry. The required exit entry may be completed by any authorized employee.

**RULE 450. TRACK BULLETINS:**

Example of Form A Track Bulletin:

|                                             |                       |
|---------------------------------------------|-----------------------|
| <b>NORTH COAST RAILROAD</b>                 |                       |
| Track Bulletin Form A Number _____          |                       |
| To:                                         |                       |
| At:                                         |                       |
| DO NOT EXCEED SPEED INDICATED BELOW BETWEEN |                       |
| TRAIN                                       | MPH RESTRICTION LIMIT |
| Complete:                                   | Train Dispatcher.     |

Example of Form C Track Bulletin:

|                                    |                   |
|------------------------------------|-------------------|
| <b>NORTH COAST RAILROAD</b>        |                   |
| Track Bulletin Form C Number _____ |                   |
| To:                                |                   |
| At:                                |                   |
| Complete:                          | Train Dispatcher. |

**RULE 521 (A). UNFORSEEN TRACK RESTRICTIONS:**

New rule is added: When it is necessary to transmit a track restriction not covered by a track bulletin directly to a train, it is to be accomplished as follows:

- (1) Train dispatcher must state his intentions to issue a track restriction.
- (2) Track restriction must be copied in writing by the receiving employee before it is repeated back to the train dispatcher.
- (3) Restriction will be issued using the following format:  
(TRAIN ID) DO NOT EXCEED (SPEED)  
BETWEEN (LIMIT) AND (LIMIT)
- (4) Track restriction may not be copied by an employee operating the controls of an engine of a moving train.

**RULE 622. SAFETY RULES:**

NCRR has adopted the current edition of Southern Pacific Lines' Safety and General Rules for all Employees.

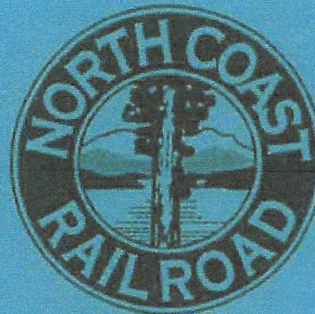
**RULE 623. TRAIN HANDLING:**

NCRR has adopted the current edition of Southern Pacific Lines' Rules and Instructions Governing Air Brake System and Train Handling.

**LOCOMOTIVE LIST**

| Engine No. | Classification | Type | Dynamic Brake |
|------------|----------------|------|---------------|
| 3190       | Roadswitcher   | GP9  |               |
| 3857       | Roadswitcher   | GP9  | STD           |
| 3804       | Roadswitcher   | GP9  | STD           |
| 3779       | Roadswitcher   | GP9  | STD           |
| 3786       | Roadswitcher   | GP9  | STD           |
| 2872       | Roadswitcher   | GP9  | STD           |
| 70         | Roadswitcher   | GP7  | STD           |

# NORTH COAST RAILROAD



## TIME TABLE No.

# 1

IN EFFECT AT

12:01 A.M. Pacific Time

Thursday, September 16, 1993

This Time Table is for the exclusive use  
and guidance of Employees.

**David R. Hebert**

*General Manager*

**Clyde L. Ferguson**

*Trainmaster*

**Frank B. Lovio**

*Roadmaster*

Eureka, California



## EUREKA LINE

| Capacity of Sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |      | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|------|-----------|----------------|-----------|
|                     |            | STATIONS                                  |      |           |                |           |
|                     |            | KORBEL                                    | 9.0  | 301.8     | 302            | ABR       |
|                     |            | BLUE LAKE                                 | 5.6  | 300.8     | 301            |           |
|                     |            | KORBLEX                                   | 3.3  | 295.2     | 295            |           |
|                     |            | ARCATA                                    | 8.4  | 292.5     | 293            |           |
| Yard                | ADQPR      | R EUREKA YL                               | 6.3  | 284.1     | 284            | 93        |
| 890                 | DA         | SOUTH BAY                                 | 11.7 | 277.8     | 278            | DTC       |
|                     |            | FORTUNA                                   | 1.6  | 266.1     |                |           |
| 3711                | DA         | ROHNERVILLE                               | 1.8  | 264.5     | 265            |           |
| 1613                | DAR        | R ALTON                                   | 7.1  | 262.7     | 263            |           |
| 275                 | SPFE       | SCOTIA                                    | 1.8  | 255.6     | 256            |           |
| 2450                | DA         | GLYNN                                     | 16.5 | 253.8     |                |           |
| 2244                | DAP        | SOUTH FORK                                | 12.3 | 237.3     | 237            |           |
| 300                 | NC         | EEL ROCK                                  | 5.5  | 225.1     | 225            |           |
| 2479                | DA         | FORT SEWARD                               | 7.6  | 216.6     | 217            |           |
| 150                 | SCP        | ALDERPOINT                                | 1.1  | 209.0     | 209            |           |
| 1600                | DA         | 208                                       | 13.6 | 208.1     |                | DTC       |
| 700                 | DA         | ISLAND MOUNTAIN                           | 10.2 | 194.5     | 195            |           |
| 476                 | DA         | BELL SPRINGS                              | 17.8 | 184.3     | 184            |           |
| 763                 | DAP        | DOS RIOS                                  | 14.0 | 166.5     | 167            |           |
| 1674                | DA         | LONGVALE YL                               | 10.0 | 152.5     | 153            | 8         |
|                     |            | MP 142.5                                  | 3.0  | 142.5     |                | DTC       |
| Yard                | PF         | WILLITS YL                                |      | 139.5     | 140            | 8         |
|                     |            | (144.6)                                   |      |           |                |           |

### RULE 480. Direct Traffic Control (DTC) in effect. MAXIMUM AUTHORIZED SPEED

|                                        |                           |
|----------------------------------------|---------------------------|
| Willits and Korbel..... 25             |                           |
| MP 183.0 to 184.0..... 10              | MP 190.0 to 204.0..... 10 |
| MP 227.0 to 227.1..... 10              | MP 228.9 to 229.1..... 10 |
| MP 256.3 to 258.5..... 10              | MP 279.4 to 280.2..... 10 |
| MP 282.0 to 295.6..... 10              | MP 295.6 to 301.8..... 10 |
| SPEED ON OTHER THAN MAIN TRACK..... 10 |                           |

### ADDITIONAL STATIONS EUREKA LINE

| MILE POST | NAME          | DIRECTION OF ENTRY |
|-----------|---------------|--------------------|
| 271.0     | Loleta        | N                  |
| 268.7     | Fernbridge    | D 1800A            |
| 257.0     | Nanning Creek | S 150C             |
| 245.6     | Shively       | N 400C             |
| 241.7     | Larabee       | N 100C             |
| 232.2     | McCann        | S 400C             |
| 205.5     | Cain Rock     | N 200C             |
| 200.3     | Kekawaka      | N 380C             |
| 195.7     | Quarry Spur   | N 200C             |
| 190.24    | 190 1/4 Spur  | S 400C             |
| 180.0     | Spryrock      | S 200C             |
| 171.1     | Woodman       | S 150C             |
| 158.1     | Farley        | D 1360A            |

## SAMOA BRANCH

| Capacity of sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |           | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|-----------|-----------|----------------|-----------|
|                     |            | STATIONS                                  |           |           |                |           |
| Yard                |            | END OF TRACK<br>1.0                       |           | 302.9     |                | ABR       |
| Yard                |            | FAIRHAVEN (LP)<br>1.4                     |           | 301.9     | 2302           |           |
|                     |            | SAMOA<br>8.0                              |           | 300.5     | 2301           |           |
|                     | Y          | R                                         | ARCATA YL | 292.5     | 293            |           |
|                     |            | (10.4)                                    |           |           |                |           |

### Absolute Block Register Territory Arcata to End of Branch MAXIMUM AUTHORIZED SPEED

|                                        |
|----------------------------------------|
| Willits and Korbel..... 20             |
| MP 295.5 to 302.9..... 10              |
| SPEED ON OTHER THAN MAIN TRACK..... 10 |

## ALTON BRANCH

| Capacity of Sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |       | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|-------|-----------|----------------|-----------|
|                     |            | STATIONS                                  |       |           |                |           |
| Yard                |            | CARLOTTA                                  | 5.0   | 267.7     | 1268           | ABR       |
| Yard                |            | ALTON                                     | (5.0) | 262.7     | 263            |           |
|                     |            |                                           |       |           |                |           |

### Absolute Block Register Territory Arcata to End of Branch MAXIMUM AUTHORIZED SPEED

|                                          |
|------------------------------------------|
| Alton and end of Carlotta Branch..... 20 |
| MP 267.0 to 267.7..... 10                |
| SPEED ON OTHER THAN MAIN TRACK..... 10   |

## SPECIAL RULES and INSTRUCTIONS NORTH COAST RR

|                                                     |                  |                        |                         |
|-----------------------------------------------------|------------------|------------------------|-------------------------|
| <b>RULE 93. LOCATION OF YARD LIMITS:</b>            |                  |                        |                         |
| South Milepost                                      | Location         | North Milepost         |                         |
| 282.0                                               | Eureka           | 285.2                  |                         |
| 151.0                                               | Longvale         | 154.0                  |                         |
| 137.9 NWP                                           | Willits          | 142.5                  |                         |
| <b>RULE 226. ABSOLUTE BLOCK REGISTER TERRITORY:</b> |                  |                        |                         |
| South Milepost                                      | Block            | North Milepost         | Register Location       |
| Eureka MP MP 285.2                                  | EUREKA to KORBEL | Mainline MP 301.8      | Depot Eureka            |
| Arcata Y MP 292.8                                   | SAMOA BRANCH     | End of Branch MP 301.9 | Depot Eureka            |
| Alton MP 262.7                                      | CARLOTTA BRANCH  | End of Branch MP 267.7 | Alton Box with Register |

|                                                            |                 |                |
|------------------------------------------------------------|-----------------|----------------|
| <b>RULE 480. DIRECT TRAFFIC CONTROL DESIGNATED LIMITS:</b> |                 |                |
| South Milepost                                             | Block Name      | North Milepost |
| 264.0                                                      | Eureka          | 282.0          |
| 255.9                                                      | Fortuna         | 264.0          |
| 253.2                                                      | Scotia          | 255.9          |
| 237.6                                                      | Glynn           | 253.2          |
| 216.9                                                      | South Fork      | 237.6          |
| 208.1                                                      | Fort Seward     | 216.9          |
| 194.5                                                      | 208             | 208.1          |
| 184.4                                                      | Island Mountain | 194.5          |
| 166.7                                                      | Bell Springs    | 184.4          |
| 154.0                                                      | Dos Rios        | 166.7          |
| 142.5                                                      | Willits         | 151.0          |

### LOAD LIMITS

|                  |                |
|------------------|----------------|
| Willits - Eureka | 251,000 pounds |
| Eureka - Korbel  | 240,000 pounds |
| Arcata - Samoa   | 240,000 pounds |
| Alton - Carlotta | 240,000 pounds |



**MAXIMUM AUTHORIZED SPEED:**

BETWEEN SCHELLVILLE AND WILLITS. 30

**EXCEPTIONS:**

|                                        |    |
|----------------------------------------|----|
| 40.4 and 29.0 (SCHELLVILLE BLOCK)..... | 25 |
| 28.5 and 25.8 (SCHELLVILLE BLOCK) ...  | 25 |
| 31.7 (Southward turnout).....          | 10 |
| 31.7 (Northward Spring switch)....     | 25 |
| 36.9 and 37.2.....                     | 20 |
| 37.2 and 37.3.....                     | 10 |
| 37.3 and 39.3.....                     | 20 |
| 44.1 and 46.7.....                     | 25 |
| 53.0 and 54.5.....                     | 25 |
| 67.5 and 67.7.....                     | 10 |
| 67.7 and 68.6.....                     | 25 |
| 88.5 and 93.4.....                     | 25 |
| 93.4 and 93.5.....                     | 10 |
| 93.5 and 122.2.....                    | 25 |
| 122.2 and 127.3.....                   | 20 |
| 127.3 and 127.9.....                   | 10 |
| 127.9 and 139.5.....                   | 20 |

SPEED ON OTHER THAN MAIN TRACK. 10

**EXCEPTIONS:**

|                                    |   |
|------------------------------------|---|
| BURDELL SIDING: OVER SCALE.....    | 3 |
| SANTA ROSA: ALL YARD TRACKS.....   | 5 |
| PETALUMA: TRACK 300 (P&SR MAIN)... | 5 |
| PETALUMA: ALL YARD TRACKS.....     | 5 |

**MAXIMUM AUTHORIZED SPEED:**

BETWEEN WILLITS AND ARCATA..... 25

**EXCEPTIONS:**

|                      |    |
|----------------------|----|
| 183.0 and 208.0..... | 10 |
| 228.9 and 229.1..... | 10 |
| 256.3 and 258.5..... | 10 |
| 279.4 and 280.2..... | 10 |

**SPEED TABLE:**

| <u>TIME PER MILE</u> | <u>MILES PER HOUR</u> |
|----------------------|-----------------------|
| 2 MIN. 0 SEC.....    | 30.0                  |
| 2 MIN. 5 SEC.....    | 28.8                  |
| 2 MIN. 10 SEC.....   | 27.7                  |
| 2 MIN. 15 SEC.....   | 26.7                  |
| 2 MIN. 24 SEC.....   | 25.0                  |
| 2 MIN. 30 SEC.....   | 24.0                  |
| 2 MIN. 45 SEC.....   | 21.8                  |
| 3 MIN. 0 SEC.....    | 20.0                  |
| 3 MIN. 30 SEC.....   | 17.1                  |
| 4 MIN. 0 SEC.....    | 15.0                  |
| 5 MIN. 0 SEC.....    | 12.0                  |
| 6 MIN. 0 SEC.....    | 10.0                  |
| 7 MIN. 0 SEC.....    | 8.8                   |
| 8 MIN. 0 SEC.....    | 7.5                   |
| 9 MIN. 0 SEC.....    | 6.7                   |
| 10 MIN. 0 SEC.....   | 6.0                   |
| 11 MIN. 0 SEC.....   | 5.5                   |
| 12 MIN. 0 SEC.....   | 5.0                   |
| 13 MIN. 0 SEC.....   | 4.6                   |
| 14 MIN. 0 SEC.....   | 4.3                   |
| 15 MIN. 0 SEC.....   | 4.0                   |
| 16 MIN. 0 SEC.....   | 3.8                   |
| 17 MIN. 0 SEC.....   | 3.5                   |

# NORTHWESTERN PACIFIC RAILROAD

**TIME TABLE NO.**

# 1

**IN EFFECT AT**

12:01 A.M. Pacific Time

Monday, July 22, 1996

This Time Table is for the exclusive use  
and guidance of Employees

**E. M. McLaughlin**  
Chief Executive Officer

**C. L. Ferguson**  
Trainmaster - Eureka

**R. D. Mitchell**  
Trainmaster - Willits

**B. J. Collins**  
Roadmaster - Willits

**D. G. Gattis**  
System Mechanical Officer - Willits

**L. M. Trout**  
Agent - Eureka

**J. V. Ryan**  
Chief Dispatcher - Eureka



| NORTHWARD           | MP LOCATION | STATION        | STATION NUMBER | MILES FROM SCHELLVILLE | SOUTHWARD |
|---------------------|-------------|----------------|----------------|------------------------|-----------|
|                     | 40.4        | SCHELLVILLE    | 10305          | 0.0                    |           |
|                     | 28.8        | BLACK POINT    | 10340          | 11.6                   |           |
|                     | 25.8        | IGNACIO        | 10345          | 14.8                   |           |
|                     | 31.3        | BURDELL        | 10385          | 20.3                   |           |
|                     | 38.5        | PETALUMA       | 10400          | 27.5                   |           |
|                     | 53.8        | SANTA ROSA     | 10440          | 42.8                   |           |
|                     | 68.0        | HEALDSBURG     | 10495          | 57.0                   |           |
|                     | 75.8        | GEYSERVILLE    | 10510          | 64.8                   |           |
|                     | 85.2        | CLOVERDALE     | 10525          | 74.2                   |           |
|                     | 100.1       | HOPLAND        | 10539          | 89.1                   |           |
|                     | 114.0       | UKIAH          | 10595          | 103.0                  |           |
|                     | 122.1       | REDWOOD VALLEY | 10620          | 111.1                  |           |
|                     | 139.5       | WILLITS        | 10700          | 128.5                  |           |
|                     | 152.5       | LONGVALE       | 10708          | 141.5                  |           |
|                     | 166.5       | DOS RIOS       | 10710          | 155.5                  |           |
|                     | 175.5       | NASHMEAD       | 10716          | 184.5                  |           |
|                     | 184.4       | BELL SPRINGS   | 10720          | 173.4                  |           |
|                     | 194.5       | ISLAND MTN     | 10722          | 183.5                  |           |
|                     | 208.1       | 208            | 10725          | 197.1                  |           |
|                     | 209.1       | ALDERPOINT     | 10726          | 198.1                  |           |
|                     | 216.8       | FORT SEWARD    | 10728          | 205.6                  |           |
|                     | 225.1       | EEL ROCK       | 10732          | 214.1                  |           |
|                     | 237.3       | SOUTH FORK     | 10736          | 228.3                  |           |
|                     | 253.8       | GLYNN          | 10742          | 242.8                  |           |
|                     | 255.6       | SCOTIA         | 10744          | 244.6                  |           |
|                     | 262.5       | ALTON          | 10750          | 251.5                  |           |
|                     | 264.5       | ROHNERVILLE    | 10752          | 253.5                  |           |
|                     | 266.1       | FORTUNA        | 10754          | 255.1                  |           |
|                     | 277.8       | SOUTH BAY      | 10762          | 266.8                  |           |
|                     | 284.1       | EUREKA         | 10764          | 273.1                  |           |
|                     | 292.5       | ARCATA         | 10770          | 281.5                  |           |
|                     | 295.2       | KORBLEX        | 10772          | 284.2                  |           |
|                     | 300.8       | BLUE LAKE      |                | 289.8                  |           |
|                     | 301.8       | KORBEL         |                | 290.8                  |           |
| ADDITIONAL STATIONS |             |                |                |                        |           |
|                     | 27.8        | NOVATO         | 10380          | 17.0                   |           |
|                     | 38.2        | PARK SIDING    | 10416          | 28.4                   |           |
|                     | 48.1        | COTATI         | 10423          | 36.3                   |           |
|                     | 48.7        | WILFRED        | 10427          | 37.9                   |           |
|                     | 50.7        | TOOD           | 10432          | 39.9                   |           |
|                     | 58.6        | FULTON         | 10470          | 47.7                   |           |
|                     | 82.9        | WINDSOR        | 10480          | 62.1                   |           |
|                     | 88.4        | GRANT          | 10486          | 66.6                   |           |
|                     | 71.0        | LYTTON         | 10505          | 61.1                   |           |
|                     | 81.3        | ASTI           | 10620          | 70.6                   |           |
|                     | 116.8       | PRESSWOOD      | 10605          | 106.0                  |           |
|                     | 120.0       | CALPELLA       | 10816          | 109.2                  |           |
|                     | 124.0       | LAUGHLIN       | 10825          | 113.2                  |           |
|                     | 131.4       | RIDGE          | 10850          | 120.6                  |           |
|                     | 158.1       | FARLEY         | 10708          | 147.3                  |           |
|                     | 171.1       | WOODMAN        | 10714          | 180.3                  |           |
|                     | 180.0       | SPYROCK        | 10718          | 189.2                  |           |
|                     | 190.26      | 190 1A         | 10721          | 179.6                  |           |
|                     | 195.7       | 195 SPUR       | 10723          | 184.9                  |           |
|                     | 200.3       | KEKANAKA       | 10724          | 188.6                  |           |
|                     | 206.6       | CAM ROCK       |                | 194.7                  |           |
|                     | 232.2       | MCCANN         | 10734          | 221.4                  |           |
|                     | 241.7       | LARABEE        | 10737          | 230.8                  |           |
|                     | 246.8       | SHVELT         | 10740          | 234.8                  |           |
|                     | 257.0       | NANNING CREEK  | 10746          | 248.2                  |           |
|                     | 268.7       | FERNBRIDGE     | 10758          | 257.8                  |           |

## SPECIAL RULES OF NWP RAILROAD

### RULE 1.20-IMPAIRED SIDE CLEARANCE

| MILEPOST | LOCATION    | DESCRIPTION |
|----------|-------------|-------------|
| 28.5     | BLACK POINT | DRAWBRIDGE  |
| 37.2     | PETALUMA    | DRAWBRIDGE  |
| 37.8     | WINGO       | BRIDGE      |
| 67.5     | HEALDSBURG  | BRIDGE      |

### RULE 6.13-YARD LIMITS-DESIGNATED LIMITS

| SOUTH MP   | YARD NAME       | NORTH MP   |
|------------|-----------------|------------|
| 44.9       | SCHELLVILLE     | 40.4       |
| 26.0 SOUTH | IGNACIO         | 26.0 NORTH |
| 37.1       | PETALUMA        | 39.6       |
| 112.7      | UKIAH           | 114.3      |
| 137.4      | WILLITS         | 142.5      |
| 151.0      | LONGVALE        | 154.0      |
| 194.0      | ISLAND MOUNTAIN | 195.8      |
| 252.5      | SCOTIA          | 256.5      |
| 282.0      | EUREKA          | 285.2      |

### RULE 6.16-BLOCK REGISTER TERRITORY-DESIGNATED LIMITS

| SOUTH MP | BLOCK NAME      | NORTH MP |
|----------|-----------------|----------|
| 262.7    | CARLOTTA BRANCH | 267.7    |
| 285.2    | KORBLEX BRANCH  | 285.2    |
| 292.8    | SAMOA BRANCH    | 300.5    |

### RULE 6.29.1-TRACKSIDE DETECTORS

| MILEPOST | DESCRIPTION               |
|----------|---------------------------|
| 28.0     | DRAGGING EQUIPMENT TALKER |
| 48.9     | HOT BOX TALKER            |
| 72.0     | DRAGGING EQUIPMENT TALKER |

### RULE 7.6-SECURING CARS OR ENGINES

SCHELLVILLE AND ARCATA:

NOT LESS THAN THREE HAND BRAKES MUST BE APPLIED ON CARS. TRAIN CREWS MUST NOT RELEASE HAND BRAKES UNTIL ENGINE IS COUPLED AND BRAKE PIPE IS CHARGED.

### RULE 16.0-DIRECT TRAFFIC CONTROL-DESIGNATED LIMITS

| SOUTH MP   | BLOCK NAME      | NORTH MP   |
|------------|-----------------|------------|
| 40.4       | SCHELLVILLE     | 26.0 SOUTH |
| 26.0 NORTH | BURDELL         | 37.1       |
| 39.6       | COTATI          | 54.2       |
| 54.2       | SANTA ROSA      | 75.9       |
| 75.9       | HEALDSBURG      | 84.3       |
| 84.3       | CLOVERDALE      | 100.0      |
| 100.0      | HOPLAND         | 112.7      |
| 114.3      | REDWOOD VALLEY  | 137.4      |
| 142.5      | WILLITS         | 151.0      |
| 154.0      | DOS RIOS        | 166.7      |
| 166.7      | BELL SPRINGS    | 184.4      |
| 184.4      | ISLAND MOUNTAIN | 194.0      |
| 195.8      | 208             | 208.1      |
| 208.1      | FORT SEWARD     | 216.9      |
| 216.9      | SOUTH FORK      | 237.6      |
| 237.6      | GLYNN           | 252.5      |
| 256.5      | FORTUNA         | 264.0      |
| 264.0      | EUREKA          | 282.0      |



## SPECIAL RULES OF NWP RAILROAD

### RULE 9.9-SPRING SWITCHES

| STATION     | LOCATION | NORMAL POSITION | FACING DIRECTION |
|-------------|----------|-----------------|------------------|
| GEYSERVILLE | MP 77.1  | MAIN TRACK      | SOUTH            |
| BURDELL     | MP 31.7  | SIDING          | NORTH            |
| BURDELL     | MP 30.5  | MAIN TRACK      | NORTH            |

### GRADE RESTRICTIONS

ON DESCENDING GRADE BETWEEN REDWOOD VALLEY AND WILLITS, TRAINS MUST NOT EXCEED 200 TONS PER AXLE OF OPERATIVE DYNAMIC BRAKE. TRAINS EXCEEDING 80 TPOB MUST NOT EXCEED 15 MPH. WHEN TRAIN HAS INSUFFICIENT DYNAMIC BRAKE, 1 RETAINING VALVE FOR EACH 150 TONS MUST BE SET. WHEN A TRAIN HAS NO DYNAMIC BRAKE, ALL RETAINING VALVES MUST BE SET AND TRAIN MUST NOT EXCEED 10 MPH. WHEN IT IS KNOWN THAT RETAINING VALVES WILL BE REQUIRED AT RIDGE, AFTER COMPLETION OF REQUIRED AIR TEST, RETAINING VALVES MAY BE SET AT WILLITS OR REDWOOD VALLEY.

### MISCELLANEOUS

1. SP 354000-354199 SERIES WOOD CHIP CARS EXCEED CLEARANCES NORTH OF MP 90.0 AND MUST NOT BE MOVED BEYOND THIS POINT. TRAINS HANDLING LOADED CARS IN ABOVE SERIES MUST REDUCE SPEED OF TRAIN NOT EXCEEDING 10 MPH OVER HEALDSBURG BRIDGE, MP 67.0. ON ALL MOVEMENTS, CARS MUST BE SEPARATED AT LEAST FIVE CARS FROM ENGINE OR CABOOSE, TRAIN LENGTH PERMITTING.
2. CARS BEARING "EXCEED PLATE C" SYMBOL OR WORDS EXCESS HEIGHT MUST NOT BE OPERATED NORTH OF CLOVERDALE.
3. PETALUMA. ONLY ONE 4-AXLE UNIT MAY OPERATE ON TRACK 300 (OLD P&SR MAIN TRACK).
4. PETALUMA. DO NOT OPERATE BEYOND WASHINGTON STREET ON TRACK 310 (OLD P&SR MAIN TRACK). TRACK OUT OF SERVICE.
5. UKIAH. TRACK 624-MASONITE MUST NOT BE SWITCHED WITH MORE THAN ONE UNIT.
6. REDWOOD VALLEY. INPAIRED CLEARANCE MAY EXIST ADJACENT TO TRACK 0643 ACCOUNT DISMANTLING OF RAILROAD CARS.
7. SIX AXLE UNITS WILL NOT OPERATE ON TRACK 441 (GP SANTA ROSA).
8. HAZARDOUS MATERIALS MAY NOT BE TRANSPORTED NORTH OF MP 142.5.
9. THE TRACK BETWEEN KORBEX-MP 295.2 AND KORBEL-MP 301.8 IS OUT-OF-SERVICE.
10. DO NOT PUT DRGW 14000 & 17000 BALLAST CARS AGAINST CENTERBEAMS OR 90+ FOOT CONTAINER CARS NORTH OF MP 142.5.
11. ALL DIRECTIONS PREVIOUSLY REFERRED TO AS "EAST" WILL NOW BE REFERRED TO AS "NORTH." ALL DIRECTIONS PREVIOUSLY REFERRED TO AS "WEST" WILL NOW BE REFERRED TO AS "SOUTH."

## ADDITIONS AND REVISIONS TO THE GENERAL CODE OF OPERATING RULES

### RULE 1.1-SAFETY RULES

NWP HAS ADOPTED THE CURRENT EDITION OF SOUTHERN PACIFIC LINES' SAFETY AND GENERAL RULES FOR ALL EMPLOYEES.

### DEFINITION: TRAIN REGISTER

A BOOK OR FORM USED AT DESIGNATED STATIONS FOR REGISTERING TIME OF ARRIVAL AND/OR DEPARTURE OF TRAINS AND SUCH OTHER INFORMATION AS MAY BE PRESCRIBED.

### RULE 1.3.1-RULES, REGULATIONS AND INSTRUCTIONS

IS REVISED TO READ:

OPERATION OF NWP WILL BE GOVERNED BY THE CURRENT EDITION OF THE GENERAL CODE OF OPERATING RULES.

### RULE 3.3-TIME COMPARISON

STANDARD CLOCK LOCATED IN THE EUREKA DEPOT OR CORRECT TIME MAY BE OBTAINED BY CALLING (707)444-8055.

### RULE 4.1-NEW TIMETABLE

THE MOMENT A NEW TIMETABLE GOES INTO EFFECT, IT WILL REPLACE THE PREVIOUS ONE AND ALL GENERAL ORDERS ISSUED PRIOR TO THE EFFECTIVE DATE OF THE NEW TIMETABLE.

### RULE 5.4.1-TEMPORARY RESTRICTIONS

YELLOW FLAGS WILL BE DISPLAYED ONE HALF MILE IN ADVANCE OF RESTRICTION WHEN PRACTICABLE.

### RULE 5.5-PERMANENT SPEED SIGNS

REDUCE SPEED SIGN; ONE HALF MILE IN ADVANCE OF RESTRICTION. INCREASE SPEED SIGNS; TRAIN MAY INCREASE SPEED WHEN REAR OF TRAIN CLEARS RESTRICTION.

### RULE 6.12-FRA EXCEPTED TRACK:

ON TRACK(S) DESIGNATED AS "FRA EXCEPTED TRACK," THE FOLLOWING WILL GOVERN:

1. MAXIMUM SPEED WILL NOT EXCEED 10 MPH.
2. NO PASSENGER TRAIN SHALL BE OPERATED.
3. NO TRAIN WILL BE OPERATED THAT CONTAINS MORE THAN FIVE CARS PLACARDED ACCORDING TO HAZARDOUS MATERIAL REGULATIONS.

### RULE 6.19-FLAGGING RULE

SPECIFIED FLAGGING DISTANCE IS ONE HALF MILE.

### RULE 6.32.6-BLOCKING PUBLIC CROSSINGS

IS REVISED TO READ:

A PUBLIC CROSSING WHICH IS BLOCKED BY A STOPPED TRAIN MUST BE OPENED WITHIN TEN MINUTES UNLESS NO VEHICLE OR PEDESTRIAN IS WAITING AT THE CROSSING.

### RULE 50.0-TRAIN HANDLING

NWP HAS ADOPTED THE CURRENT EDITION OF SOUTHERN PACIFIC LINES' RULES AND INSTRUCTIONS GOVERNING AIR BRAKE SYSTEM AND TRAIN HANDLING.

# SAFETY FIRST !

GETTING HURT IS A FOOLISH WAY  
TO PROVE THAT RULES  
MEAN WHAT THEY SAY



**Exhibit B5 – “A&MR Key to New NWP Success” (8/1995)**





VOL. XI NO.4

HUMB. CO. COLLECTION

Railroads - Arcata + Mad River  
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THE

# HEADLIGHT

NORTHWESTERN PACIFIC RAILROAD HISTORICAL SOCIETY

Preserving the heritage of Redwood Empire railroading

AUGUST, 1995

## A&MR Key to New NWP Success

### Headlight Staff Report

**SACRAMENTO**—Rebuilding and operating the picturesque but derelict Arcata & Mad River Railroad in Humboldt County is one key to putting the old Northwestern Pacific Railroad fully into public hands and ensuring its future success, a panel of the California Transportation Commission was told here July 12.

Leading to these goals, CTC is being asked to approve a keystone feature of an intricate financial plan under which the new NWP Joint Powers Authority hopes to buy 140 miles of mostly ex-NWP trackage from Southern Pacific for \$27 million, using chiefly federal and state funds. That plan includes a \$12 million, 20-year interest-free loan from the Federal Highway Administration—in bureaucrat talk, the "Q Fund."

North Coast Railroad Authority's presentation encountered a sometimes skeptical but generally encouraging response from members of CTC's Railway Committee. No action was taken.

To get the Q Fund money, a way must be found to repay it. The method for repayment is what CTC is being asked to endorse, probably at its August meeting in Irvine. That method is for the NCRA—which operates the North Coast Railroad from Willits to the Eureka area—to put its lion's share of revenue from the California Northern Railroad's lease of NWP into a trust fund, which along with trackside leasehold revenues hopefully will build to \$12 million by the repayment year of 2015.

If this arrangement passes muster with CTC, it will "cause the release of about \$10 million of additional federal...and state funds for use in rehabilitating portions of NCRA's existing system located north of Eureka as well as returning the Arcata & Mad River Railroad to service....," Allan Hemphill, first vice chairman of NCRA, informed the CTC Railway Committee here, continuing:



### The ANNIE & MARY Oldest Railroad In The West

"Return of the A&MR to service is expected to provide both cost reductions and increased traffic volume and revenue to the NCRA," an estimated net of nearly \$600,000 a year.

Hemphill appeared here with Gary Milliman, Fort Bragg city administrator and chairman of NCRA, and a delegation—which sat silently by—from the Golden Gate Bridge District. The bridge, Marin County and NCRA have joined to form the NWP Joint Powers Authority. They hope to complete the purchase from SP by year's end.

Reconstruction of A&MR would take about two years and add an estimated annual 1,000 carloads of lumber for NCRR from Simpson Timber and Blue Lake Forest Products mills, which now truck lumber to load a far smaller number of cars at NCRR railheads at Korbex or Arcata. NCRR now credits the mills with about \$100,000 a year in reload allowances for the truck-to-rail transfers.

A&MR, nicknamed the "Annie & Mary," dates from 1855 as a horse-drawn railroad to the Arcata wharf. It developed into an odd-width narrow gauge line to the mill at Korbex, plus timber-gathering spurs. Dual gauged after 1925, it survived as a standard-gauge line of about 7 miles until 1985. Its trackage was purchased by the Eureka Southern Railroad, NCRR's immediate predecessor.

The issue here, in Hemphill's word, is a "critical" piece of the jigsaw puzzle in putting NWP back together. Financial viability of the southern end of the line, the part

south of Willits being bought from SP, depends on the flow of lumber-laden cars from the north. And now the north must depend, for repayment of the federal loan, on revenue from the south.

Future passenger operations there, including commuter service in Marin and Sonoma counties, must depend upon other arrangements to be made in the future. NCRR, however, hopes to restore passenger excursion operations through the scenic Eel River canyon.

NCRA said that, at current operating levels—which are expected to rise—its share of revenues from the California Northern lease of NWP is at least \$210,000 annually, and its share of revenues from about 500 leases of businesses on railroad-owned trackside property is another \$125,000—a total of \$335,000. This money (15 per cent of Cal Northern's gross on the line) now goes to SP; but will flow to the new Joint Powers Authority after the purchase.

U.S. Rep. Frank D. Riggs (R-Windsor), in a letter to CTC, urged approval of the NCRA fund proposal. He noted that the acquisition of NWP has had the support of three successive congressmen from the First District, two of them his political adversaries.

"Further, I understand that the use of these ["Q"] funds in the proposed fashion will make available a like amount of federal grant funds for use in securing station sites along the southern portion of the line, and for continued rehabilitation of railroad facilities north of Willits," Riggs wrote.

Additional political support for the NCRA proposal was voiced at the meeting here by State Sen. Mike Thompson (D-St. Helena) and by Assemblyman Dan Hauser (D-Arcata), sponsor of the legislation that created NCRA and rescued the north end of the railroad from abandonment.

Robert Shelton of Corona del Mar (Orange County), the Railway Committee chairman, calling the NCRA proposal "com

*Continued Page 3*



## Funding for Rehabilitation of Arcata & Mad River Railroad 1996.

# Deal final in purchase of rail line

**Escrow closed at 12:01 a.m. today**

By K.C. MEADOWS  
 The Daily Journal

The ink is finally dry on the purchase of 140 miles of Southern Pacific Railroad by a public group made up of the North Coast Railroad Authority, the Golden Gate Bridge District and Marin County.

Escrow on the purchase closed at 12:01 a.m. today.

The purchase was, for all intents and purposes, finalized in February when it got official approval from the California Transportation Commission.

The CTC in February released \$42 million in state and federal funds, \$28 million of which will go to Southern Pacific for rails from Willits to Larkspur.

The North Coast Railroad Authority has agreed to guarantee a \$12-million loan as part of the deal to purchase 75.4 miles of track from Willits to Healdsburg.

The North Coast Railroad Authority will get an additional \$9 million out of the pot for a variety of projects, including reopening the Arcata-to-Mad River rail line to serve shippers in that area, and restoring and purchasing passenger cars.

The railroad purchase has been in the works for years, blocked in large part by a recalcitrant Marin County, which doubted the North Coast Railroad's financial stability.

But when fears of losing the federal money set aside for the purchase began to spread in early 1995, negotiations went back into high gear.

In March 1995, an agreement was reached between the North Coast Railroad Authority (which represents Mendocino, Sonoma and Humboldt counties), Marin County and the Golden Gate Bridge District to purchase the line.

Under the agreement, the line from Willits to Healdsburg would become part of the North Coast railroad. The additional 41 miles of track from Healdsburg to Novato and the 23-mile spur from Novato to Larkspur would be owned by the collective authority of the three agencies. The North Coast Railroad Authority already owns the line from Arcata to Willits.

Passenger excursions and boosting tourism along the North Coast are a priority for the North Coast Railroad Authority, which had hoped to start excursions this summer.

Track repairs and passenger car improvements will likely push that date into 1997. The railroad has had proposals from private excursion companies, including dinner excursions from Healdsburg to Willits and day excursions linking up with the Skunk Train in Willits and passenger ships from San Francisco in Eureka.

Clipped from  
Ukiah Daily Journal  
Ukiah, California  
 30 Apr 1996, Tue • Page 1

Show article text (OCR) ▾



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**Exhibit B6 – “Railroad Starts Work on Tracks”**



# Railroad starts work on tracks

By David Anderson  
The Times-Standard

BLUE LAKE — Work has started on replacing the tracks of the former Arcata and Mad River Railroad.

Dan Hauser, director of the Northwestern Pacific Railroad, said the old rails are being salvaged and will be sold for scrap. They will eventually be replaced by heavier rails capable of bearing the weight of modern locomotives.

Hauser said it will probably be 18 to 24 months before the rails are replaced. Three trestles and a bridge will also have to be re-

placed, and some curves in the 7-mile line flattened.

"This was essentially an old logging railroad, built for 40-foot wooden boxcars," he said. "Modern cars are at least 60 feet long."

Most of the line, locally known as the "Annie and Mary," was laid in the 1870s. Some sections, built in the 1850s, were the first rails west of the Mississippi River.

The line originally started at the end of a pier reaching out into Arcata Bay. The depot was where the Arcata post office is now.

The Arcata and Mad River Railroad runs from Korbel through

■ See ANNIE/Back of section



## ANNIE: Federal grant funds project

FROM A1

Blue Lake and Glendale, joining the main line of the Northwestern Pacific Railroad in Arcata. It carried lumber until 1994, when the Federal Railroad Authority closed it because of the condition of the tracks and trestles.

The line, formerly owned by Simpson Timber Co., was sold to Eureka Southern Railroad, which went bankrupt in 1989. The

Eureka Southern holdings were acquired by the Northcoast Railroad Authority, a public agency, in 1992.

The authority runs the Northwestern Pacific, which links Humboldt County to the San Francisco Bay Area.



**4TH BIG WEEK!!**  
**TIP TOP TOPLESS**  
**RV SALES**

Exhibit B7 – “Rail Replacement Wait May be Long” (4/40/1996)



12-7-1997  
**Rail replacement  
wait may be long**

**BLUE LAKE** — Removal of the old rails on the Arcata and Mad River Railroad should be completed by the end of the month, North Coast Rail Authority officials say.

But it may be almost two years before the rail authority can afford to install the heavier rails it needs to reopen the line. Three trestles and a bridge must also be replaced.

General Manager Dan Hauser said the railroad authority received a \$4.5 million federal grant to upgrade the Arcata and Mad River. But last year approval was received to use the funds to repair storm damage on the main line.

"It was done with the concurrence of federal government and the two shippers on the line — Simpson and Blue Lake Forest Products," he said. "They agreed it was no use gold-plating a spur line if we couldn't keep the main line open."

The railroad suffered heavy damage in the winter storms of 1975 and 1976, especially in the Eel River Canyon. Most of the promised federal disaster funds have not yet been received, leaving the line heavily indebted for already completed repair work.



## Exhibit C

### 1152.50(b) Verification and Certification



Verification and Certification that Rail Line at Issue

In STB Docket AB 1305X

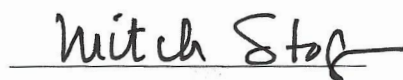
Meets the Criteria of 49 C.F.R. 1152.50(b)

I, Mitch Stogner, state that I am the Executive Director of North Coast Railroad Authority ("NCRA"), an agency of the State of California; that I am authorized to make this verification and certification; that I have read the forgoing Notice of Exemption in AB 1305X; and that I know the facts asserted therein are true and accurate as stated, to the best of my knowledge, information, and belief.

I hereby certify that no freight traffic has moved over NCRA's approximately 175.84 rail line between MP 139.5 to end of line and branches at Carlotta, Samoa and Korbel ("the Line") for two years prior to the date hereof. Indeed, there has been no freight movement over the aforementioned line since the FRA embargo in 1998. The Line is located in Mendocino, Trinity and Humboldt Counties, CA. The Line has no overhead traffic, so none needs to be rerouted over other lines. No formal complaint filed by a user of rail service on the Line (or a State or Local government entity acting on behalf of such user) regarding cessation of service over the Line either is pending with the Surface Transportation board or any U.S. District Court, or has been decided in favor of a complainant within the two-year period.

The foregoing verification and certification is made on behalf of NCRA under penalties for perjury under the laws of the United States by the undersigned after due and careful investigation of the matters herein verified and certified and is based on the best of the undersigned's knowledge, information and belief.

For filing: May 14, 2021



Mitch Stogner, NCRA Executive Director

## Exhibit D

### Combined Certificates of Service and Publication

Pursuant to 49 C.F.R. 1152.50(d)(1), the undersigned hereby certifies that notice of the proposed abandonment in Docket No. AB 1305X was mailed by certified U.S. mail, postage pre-paid first class, on 9 April 2021 to the following parties:

California Public Utilities Commission  
300 Capitol Mall  
Sacramento, CA 95814

California Public Utilities Commission  
506 Van Ness Avenue  
San Francisco, CA 94102

National Park Service – Conservation and Outdoor Recreation Division  
1849 C Street NW  
Washington, D.C. 20240

Chief of Forest Service  
Forest Service – USDA  
1400 Independence Avenue SW  
Washington, D.C. 20250-1111

SDDC—TEA—Railroads for National Defense Program  
1 Soldier Way, Bldg 1900W  
Scott Air Force Base, Illinois 62225



and, in addition, that email notice was provided on that date to the attention of Barbara Rice at NPS-Rivers, Trails & Conservation Assistance at

[Pwr\\_rtca@ups.gov](mailto:Pwr_rtca@ups.gov).

In addition, the undersigned hereby certifies that notice of the proposed abandonment in Docket No. AB 1305X was published in newspapers of general jurisdiction in Mendocino, Trinity and Humboldt Counties respectively, as required by 49 C.F.R. 1105.7(c) and .12, and in the form set forth below on the dates and in accordance with the statements in the three attached affidavits of publication.

In addition, the undersigned hereby certifies service by deposit in the U.S. Mail, postage pre-paid, first class (or equivalent) and/or by email and electronic transmission on March 9, 2021, of the combined Environmental Report and Historic Report and the attached cover letter to all recipients listed on the attachment to the cover letter in accordance with 49 C.F.R. 1105.7, 1105.8(c) and 1105.11.

  
Charles H. Montange

Dated: May 14, 2021

## Newspapers and Form of Notice

Ukiah Daily Journal  
617 S. State St.  
Ukiah, CA 95482  
(707-468-3500)

Times-Standard  
930 Sixth St.  
Eureka, CA 95501  
(707-441-0500)

Trinity Journal  
500 Main St.  
Weaverville, CA 96093  
(530-623-5382)

\*\*\*\*\*

North Coast Railroad Authority gives notice that on or about May 14, 2021, it intends to file with the Surface Transportation Board, Washington, DC, a notice of exemption under 49 CFR 1152 Subpart F - Exempt Abandonments permitting the abandonment of an approximately 175.84 mile line of railroad between railroad milepost 139.5 near Commercial Street in Willits, which traverses through United States Postal Service ZIP Codes 95429, 95595, 95454, 95542, 95560, 95559, 95553, 95571, 95569, 95565, 95562, 95540, 95551, 95537, 95564, 95524, 95521, 95519, 95525, 95521, 95524, 95501, 95503, 95526, 95514, 95511, and 95490, and railroad milepost 267.72 near Carlotta, milepost 300.50 near Samoa, and milepost 301.8 near Korbel, inclusive of Eureka at milepost 284.1 and Korblex at milepost 295.57, in Mendocino, Trinity and Humboldt Counties, California. The proceeding will be docketed as No. AB 1305X. North Coast Railroad Authority intends to "railbank" the line of railroad for interim trail use and future rail reactivation pursuant to 16 U.S.C. 1247(d) as part of the proceeding.

The Board's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA), which will normally be available 25 days after



the filing of the notice of exemption. Comments on environmental and energy matters should be filed no later than 15 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC 20423 or by calling that office at 202-245-0238.

Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board's Office of Proceedings, Washington, DC 20423 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicant's representative [See 40 CFR 1104.12(a)]. Starting Tuesday, March 17, 2020, the Board provides that all filings and other submissions with the Board should be made electronically. For further information on electronic filing, please see the Board's webpage at <https://prod.stb.gov/proceedings-actions/e-filing/>. Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Charles H. Montange, Law Offices of Charles H. Montange, 426 NW 162<sup>nd</sup> St., Seattle, WA 98177, telephone 206-546-1936, email [c.montange@frontier.com](mailto:c.montange@frontier.com).

## Ukiah Daily Journal

617 S. State St  
Ukiah, California 95482  
(707) 468-3500  
sfullbright@ukiahdj.com

3836334

NORTH COAST RAILROAD AUTHORITY  
419 TALMAGE ROAD, SUITE M  
UKIAH, CA 95482

### PROOF OF PUBLICATION (2015.5 C.C.P.)

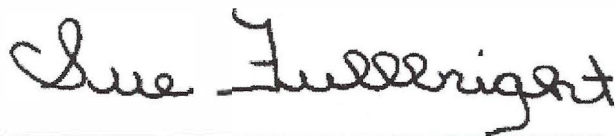
### STATE OF CALIFORNIA COUNTY OF MENDOCINO

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Ukiah Daily Journal, a newspaper of general circulation, printed and published daily in the City of Ukiah, County of Mendocino and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Mendocino, State of California, under the date of September 22, 1952, Case Number 9267; that the notice, of which the annexed is a printed copy (set in type not smaller than non-pareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

04/21/2021

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Ukiah, California,  
April 22th, 2021



Sue Fullbright, LEGAL CLERK

Legal No. 0006569624

5072-21

4-21/21

North Coast Railroad Authority gives notice that on or about May 14, 2021, it intends to file with the Surface Transportation Board, Washington, DC, a notice of exemption under 49 CFR 1152 Subpart F - Exempt Abandonments permitting the abandonment of an approximately 175.84 mile line of railroad between railroad milepost 139.5 near Commercial Street in Willits, which traverses through United States Postal Service ZIP Codes 95429, 95595, 95454, 95542, 95560, 95559, 95553, 95571, 95569, 95565, 95562, 95540, 95551, 95537, 95564, 95524, 95521, 95519, 95525, 95521, 95524, 95501, 95503, 95526, 95514, 95511, and 95490, and railroad milepost 267.72 near Carlotta, milepost 300.50 near Samoa, and milepost 301.8 near Korbel, inclusive of Eureka at milepost 284.1 and Korbel at milepost 295.57, in Mendocino, Trinity and Humboldt Counties, California. The proceeding will be docketed as No. AB 1305X. North Coast Railroad Authority intends to "railbank" the line of railroad for interim trail use and future rail reactivation pursuant to 16 U.S.C. 1247(d) as part of the proceeding.

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provides that all filings and other submissions with the Board should be made electronically. For further information on electronic filing, please see the Board's webpage at <https://prod.stb.gov/proceedings-actions/e-filing/>. Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Charles H. Montange, Law Offices of Charles H. Montange, 426 NW 162nd St., Seattle, WA 98177, telephone 206-546-1936, email [c.montange@frontier.com](mailto:c.montange@frontier.com).

# Affidavit of Publication

No.

{ North Coast Railroad Authority  
419 Talmage Road, Suite M  
Ukiah, CA 95482  
{

## AFFIDAVIT OF PUBLICATION OF

### PUBLIC NOTICE "Notice of Exempt Abandonments"

BY TRINITY JOURNAL

STATE OF CALIFORNIA  
SS.  
COUNTY OF TRINITY

Wayne R. Agner of the said County, being duly sworn, deposes and says:

That he is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years and that he is not a party to, nor interested in the above entitled matter;

That he is the publisher of The Trinity Journal, a newspaper of general circulation published in the Town of Weaverville, County of Trinity, and which newspaper at all times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said Town of Weaverville, County of Trinity, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to; and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

April 21, 2021

I hereby certify under penalty of perjury that the foregoing is true and correct. Executed at Weaverville, California, on the 21st day of April 2021.

*Wayne R. Agner*  
WAYNE R. AGNER  
Publisher  
V.V.

#### NOTICE OF EXEMPT ADANDONMENT

North Coast Railroad Authority gives notice that on or about May 14, 2021, it intends to file with the Surface Transportation Board, Washington, DC, a notice of exemption under 49 CFR 1152 Subpart F - Exempt Abandonments permitting the abandonment of an approximately 175.84 mile line of railroad between railroad milepost 139.5 near Commercial Street in Willits, which traverses through United States Postal Service ZIP Codes 95429, 95595, 95454, 95542, 95560, 95559, 95553, 95571, 95569, 95565, 95562, 95540, 95551, 95537, 95564, 95524, 95521, 95519, 95525, 95521,

95524, 95501, 95503, 95528, 95514, 95511, and 95490, and railroad milepost 267.72 near Carlotta, milepost 300.50 near Samoa, and milepost 301.8 near Korbex, inclusive of Eureka at milepost 284.1 and Korbex at milepost 295.57, in Mendocino, Trinity and Humboldt Counties, California. The proceeding will be docketed as No. AB 1305X. North Coast Railroad Authority intends to "railbank" the line of railroad for interim trail use and future rail reactivation pursuant to 16 U.S.C. 1247(d) as part of the proceeding. The Board's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA), which will normally be available 25 days after the filing of the notice of exemption. Comments on environmental and energy matters should be filed no later than 15 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC 20423 or by calling that office at 202-245-0238. Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board's Office of Proceedings, Washington, DC 20423 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicant's representative [See 40 CFR 1104.12(a)]. Starting Tuesday, March 17, 2020, the Board provides that all filings and other submissions with the Board should be made electronically. For further information on electronic filing, please see the Board's webpage at <https://prod.stb.gov/proceedings-actions/e-filing/>. Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Charles H. Montange, Law Offices of Charles H. Montange, 426 NW 162nd St, Seattle, WA 98177, telephone 206-546-1936, email [c.montange@montanier.com](mailto:c.montange@montanier.com).  
April 21, 2021



# The Times-Standard

PO Box 3580  
Eureka, CA 95502  
707-441-0571  
legals@times-standard.com  
3836334

NORTH COAST RAILROAD AUTHORITY  
419 TALMAGE ROAD, SUITE M  
UKIAH, CA 95482

## PROOF OF PUBLICATION (2015.5 C.C.P.)

### STATE OF CALIFORNIA County of Humboldt

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-mentioned matter. I am the principal clerk of the printer of THE TIMES-STANDARD, a newspaper of general circulation, printed and published daily in the City of Eureka, County of Humboldt, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Humboldt, State of California, under the date of June 15, 1967, Consolidated Case Numbers 27009 and 27010; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit,

04/22/2021, 04/23/2021

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Eureka, California,  
This 27th day of April, 2021

Robin Imholte

Legal No. 0006569645

North Coast Railroad Authority gives notice that on or about May 14, 2021, it intends to file with the Surface Transportation Board, Washington, DC, a notice of exemption under 49 CFR 1152 Subpart F - Exempt Abandonments permitting the abandonment of an approximately 175.84 mile line of railroad between railroad milepost 139.5 near Commercial Street in Willits, which traverses through United States Postal Service ZIP Codes 95429, 95595, 95454, 95542, 95560, 95559, 95553, 95571, 95569, 95565, 95562, 95540, 95551, 95537, 95564, 95524, 95521, 95519, 95525, 95521, 95524, 95501, 95503, 95526, 95514, 95511, and 95490, and railroad milepost 267.72 near Carlotta, milepost 300.50 near Samoa, and milepost 301.8 near Korbex, inclusive of Eureka at milepost 284.1 and Korbex at milepost 295.57, in Mendocino, Trinity and Humboldt Counties, California. The proceeding will be docketed as No. AB 1305X. North Coast Railroad Authority intends to "railbank" the line of railroad for interim trail use and future rail reactivation pursuant to 15 U.S.C. 1247(d) as part of the proceeding. The Board's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA), which will normally be available 25 days after the filing of the notice of exemption. Comments on environmental and energy matters should be filed no later than 15 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC 20423 or by calling that office at 202-245-0238. Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board's Office of Proceedings, Washington, DC 20423 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicant's representative [See 40 CFR 1104.12(a)]. Starting Tuesday, March 17, 2020, the Board provides that all filings and other submissions with the Board should be made electronically. For further information on electronic filing, please see the Board's webpage at <https://prod.stb.gov/proc>

**eedings-actions/e-filing/ .**

Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Charles H. Montange, Law Offices of Charles H. Montange, 426 NW 162nd St., Seattle, WA 98177, telephone 206-546-1936, email [c.montange@frontier.com](mailto:c.montange@frontier.com).

4/22, 4/23/2021





**North Coast Railroad Authority**  
**419 Talmage Road, Suite M**  
**Ukiah, CA 95482**  
**707-463-3280**

EI – 30360

March 9, 2021

To: Addressees on Attached List

Re: Proposed abandonment and railbanking of North Coast Railroad Authority's Line from Willits (MP 139.5) to end of line in Samoa, Korblex, Korbel, and Carlotta, to be docketed as North Coast Railroad Authority – Abandonment Exemption – in Mendocino, Trinity and Humboldt Counties, CA, Surface Transportation Board docket no. AB 1305

To whom it may concern:

On May 14, 2021 (or sixty days after posting of this Environment Report/Historic Report, whichever is later), we expect to be filing with the Surface Transportation Board an abandonment proceeding pursuant to 49 C.F.R. 1152.50 (two-year out-of-service exempt abandonments) seeking authority to abandon and to railbank (per 16 U.S.C. 1247(d) for interim rail use subject to rail reactivation) a line of railroad located in Mendocino, Trinity and Humboldt Counties, CA, between Willits at Commercial Street (MP 139.5) to Eureka (approximately MP 284.1) including the entirety of the Samoa, Korblex and Carlotta Branches (ending at approximately MP 302.9, 295.6 and 267.7 respectively, and also inclusive of North Coast Railroad Authority's (NCRA's) Arcata and Mad River Subsidiary which extends through Blue Lake (approximately MP 300.8) to Korbel, ending at approximately MP 301.8. Attached is an Environmental Report and Historic Report (ER/HR) describing the proposed action and any expected environmental (and/or historic) effects, as well as a map of the affected area (Exhibit A in the ER/HR).

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone 202-

245-0238 and refer to the above Docket No. AB-1305. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to OEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Charles H. Montange who may be contacted by telephone at 206-546-1936 or by mail at Law Offices of Charles H. Montange, 426 NW 162<sup>nd</sup> St., Seattle, WA 98177. His email address is [c.montange@frontier.com](mailto:c.montange@frontier.com).

Very truly,

A handwritten signature in black ink, appearing to read "Mitch Stogner", with a long horizontal flourish extending to the right.

Mitch Stogner,

Executive Director, NCRA

Att: List of recipients of this notice letter



BEFORE THE SURFACE TRANSPORTATION BOARD

North Coast Railroad Authority – )  
Abandonment Exemption – ) AB 1305X  
in Humboldt, Trinity and Mendocino )  
Counties, CA )

Service List for Combined Environmental Report and Historic Report  
(for distribution circa March 9, 2021)<sup>1</sup>

California State Clearinghouse  
Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044

[website indicates suspended paper submissions so sent electronically to:  
state.clearinghouse@opr.ca.gov]

California Environmental Protection Agency  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815  
cepacomm@calepa.ca.gov

California Coastal Commission

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<sup>1</sup> Due to covid, many are working remotely and some agencies (like STB) have actually indicated submissions should be made electronically. On this service list, the California Clearinghouse and North Coast Regional Water Quality Control Board websites (like STB's) call for submissions to be made electronically. Accordingly, NCRA is using the email addresses for submission to those entities. In all other cases, NCRA is using USPS addresses. NCRA is also supplying electronic copies or at least notice per the email addresses provided as found on websites or supplied in response to telephone calls. NCRA is unable to provide email versions or notice to those entities for whom no email address is reasonably apparent on their websites, and who have either stated USPS service is adequate or have not responded to inquiry about email service.

North Coast District  
1385 8<sup>th</sup> St. #130  
Arcata, CA 95521  
[aurora.robinson@coastal.ca.gov](mailto:aurora.robinson@coastal.ca.gov)

Julianne Polanco, State Historic Preservation Officer  
California State Parks  
Office of Historic Preservation  
1725—23<sup>rd</sup> St., Suite 100  
Sacramento, CA 95816  
[calshpo.ohp@parks.ca.gov](mailto:calshpo.ohp@parks.ca.gov)

North Coast Regional Water Quality Control Board  
5550 Skylane Blvd Suite A  
Santa Rosa, CA 95403-1071  
[Board prohibits paper filings, so submitted by email attachment to  
[NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)]

Round Valley Indian Tribes  
Att. Kathleen Willits  
77826 Covelo Road  
Covelo, California 95428  
[tribalreceptionist@rvit.org](mailto:tribalreceptionist@rvit.org)

California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
[secretary@resources.ca.gov](mailto:secretary@resources.ca.gov)

Bear River Band of Rohnerville Rancheria  
Att: Josefina Cortez, Chair  
266 Keisner Road  
Loleta, CA 95551  
[no apparent email address as of 5 March]

Humboldt County Board of Supervisors



825 Fifth St.  
Eureka, CA 95501  
cob@co.humboldt.ca.us

Planning Commission,  
Humboldt County  
3015 H Street  
Eureka, CA 95501  
Planningclerk@co.humboldt.ca.us

Blue Lake Rancheria  
Att: Claudia Brundin, Chairperson  
PO Box 428  
Blue Lake, CA 95525  
info@bluelakerancheria-nsn.gov

Trinity County Board of Supervisors  
11 Court St., Room 230  
P.O. Box 1613  
Weaverville, CA 96093  
[no apparent email address as of 5 March]

Trinity County Planning Department  
61 Airport Road  
P.O. Box 2819  
Weaverville, CA 96093  
Info.planning@trinitycounty.org

Wiyot Tribe, Table Bluff Reservation  
Att: Ted Hernandez, Tribal Chair  
1000 Wiyot Drive  
Loleta, CA 95551  
ted@wiyot.us

Mendocino Board of Supervisors  
501 Low Gap Road, Room 1010

Ukiah, CA 95482  
bos@mendocinocounty.org

Mendocino County Planning Commission  
860 N. Bush St.  
Ukiah, CA 95482  
pbs@mendocinocounty.org

Sherwood Valley Rancheria  
Att: Melanie Rafanan, Chairperson  
190 Sherwood Hill Drive  
Willits, CA 95490  
[hardcopy sufficient at this time]

US Environmental Protection Agency  
Region 9 (Pacific Southwest)  
75 Hawthorne St.  
San Francisco, CA 94105  
[no apparent email address as of 5 March]

US Fish and Wildlife Service  
Pacific Southwest Region  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825-1846  
[no apparent email address as of 5 March]

Regional Director, Pacific West Region  
National Park Service  
333 Bush Street, Suite 500  
San Francisco, CA 94104-2828  
[no apparent email address as of 5 March]

US Army Corp of Engineers, San Francisco District  
450 Golden Gate Ave 4th floor  
San Francisco, CA 94102  
cespn—regulatory—info@usace.army.mil



Communications and Outreach Branch, NOAA  
N/NGS12

National Geodetic Survey, SSMC3 #9340  
1315 East-West Highway  
Silver Spring, MD 20910-3282  
Dana.Caccamise@noaa.gov

Carlos Suarez, State Conservationist  
California State Office, National Soil and Conservation Service  
Richard E. Lyng USDA Service Center  
430 G Street, #4164  
Davis, CA 95616-4164  
raeann.dubay@usda.gov

U.S. Department of the Interior  
Bureau of Land Management  
California State Office  
2800 Cottage Way, Suite 1623  
Sacramento, CA 95825  
BLM\_CA\_WEB\_SO@blm.gov

Bureau of Land Management – Arcata Field Office  
1695 Heindon Road  
Arcata, CA 95521-4573  
BLM\_CA\_Web\_AR@blm.gov

U.S. Forest Service  
Region 5 (Pacific Southwest)  
1323 Club Drive  
Vallejo, CA 94592  
Dennis.geiser@usda.gov

Friends of the Eel River  
Att: Scott Greacen  
PO Box 4945  
Arcata, CA 95518  
scott@eelriver.org

Humboldt Trails Council  
PO Box 7164  
Eureka, CA 95502  
info@humtrails.com

Rails to Trails Conservancy  
Att: Laura Cohen  
1736 Franklin Street, Suite 550  
Oakland, CA 94612  
laura@railstotrails.org

Mendocino National Forest  
825 N. Humboldt Ave.  
Willows, CA 95988  
[stated hard copy service is sufficient]

Six Rivers National Forest  
1330 Bayshore Way  
Eureka, CA 95501  
[no apparent email address as of 5 March]

California Department of Transportation  
P.O Box 942873  
Sacramento, CA 94273-0001  
Leishara.ward@dot.ca.gov



Exhibit E  
Combined ER/HR  
(on file under Environmental Comments  
for AB 1305X since March 9, 2021)

Exhibit E

Combined ER/HR

(on file under Environmental Comments  
for AB 1305X since March 9, 2021)



BEFORE THE SURFACE TRANSPORTATION BOARD

North Coast Railroad Authority – )  
Abandonment Exemption – ) AB 1305X  
in Humboldt, Trinity and Mendocino )  
Counties, CA )

COMBINED ENVIRONMENTAL AND HISTORY REPORT  
(for circulation on or after 9 March 2021)

ENVIRONMENTAL REPORT

1. 49 CFR 1105.7(e)(1): Proposed Action and Alternatives.

*Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action including a readable, detailed map and drawings clearly delineating the project.*

Response: NCRA proposes to abandon (and railbank) an approximately 144.6-mile-long rail line extending from Milepost (MP) 139.5 at Willits in the south, and MP 284.1 near Eureka in the north, all in the State of California. In addition, NCRA proposes to abandon (and railbank) three branch lines (all in the State of California) intersecting the above-mentioned main line. These branch lines include the entirety of the Carlotta Branch (MP 262.74 near Alton to MP 267.72 near Carlotta, approximately 4.98 miles long); the Korblex Branch (MP 284.1 near

Eureka to MP 295.57 near Korblex, approximately 11.47 miles long); and the Samoa Branch (MP 292.84 near Arcata to MP 300.50 near Samoa, approximately 7.66 miles long). Inclusive of the three Branches, the total mileage is 168.71 miles.

To the extent STB still has jurisdiction over NCRA's Arcata & Mad River (or "Annie and Mary") "subsidiary", MP 295.57 near Korblex for approximately 6.23 miles to MP 301.8 near Korbel,<sup>1</sup> NCRA also proposes to encompass that subsidiary in the abandonment (and railbanking). Key facts relating to STB jurisdiction (i.e., whether it is spur or track subject to agency abandonment jurisdiction) over Annie and Mary are set forth in Exhibit B. NCRA believes that this Board has jurisdiction over the Annie and Mary for the reasons stated in Exhibit B. Inclusive of Annie and Mary, the total mileage proposed for abandonment and railbanking) is approximately 175.

NCRA further intends to preserve all lines and branches above referenced for interim trail use and possible future rail reactivation ("railbanking") pursuant to 16 U.S.C. 1247(d). Pursuant to newly adopted California legislation and the authorization of this Board, NCRA expects either to retain ownership of the above

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<sup>1</sup> Different sources give different numbers for the end of line at Korbel. The relevant timetables for NCRA (North Coast Railroad in 1993 and Northwestern Pacific Railroad in 1996, both for NCRA) indicate the line ended in Korbel at MP 301.8. See Exhibit B.



referenced rail lines and become the interim trail manager of the lines<sup>2</sup> or transfer the property to a new agency of the State of California for that purpose. The entire system will hereinafter be referred to as “the Line.”<sup>3</sup> The Line is located in Humboldt, Trinity and Mendocino Counties, CA.<sup>4</sup>

Embargo and non-use. The Federal Railroad Administration (FRA) issued an emergency embargo barring operation of trains on the line north of MP 63.4 between Schellville and Napa Junction. See 63 Fed. Reg. 67976 (Dec. 9, 1998). FRA modified the emergency embargo to allow California Western Railroad (CWR) to operate its tourist excursion trains on approximately 1.5 miles of NCRA’s line between junction with CWR and CWR’s passenger excursion depot in NCRA’s Willits yard, including certain tracks in the Willits Yard used to turn equipment. See 64 Fed. Reg. 30557 (June 8, 1999). However, as a result of the

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<sup>2</sup> Governmental entities which are also railroads are allowed to railbank their lines provided they comply with the requirements of 49 C.F.R. 1152.29. See City of Temple, Tex. – Abandonment Exemption – in Bell County, Tex., AB 1302X, served Jan. 26, 2021, slip op. at 3 n.3.

<sup>3</sup> NCRA also owns trackage or freight easements on trackage south of Willits through Cloverdale and Petaluma to Ignacio and on to Schellville and Lombard. NCRA does not propose abandonment of its common carrier obligations on trackage or easements south of Willits at this time. NCRA expects to transfer all of its trackage and freight easements south of the Mendocino/Sonoma County line to Sonoma-Marin Area Rail Transit District (“SMART”) pursuant to SMART – Acq. and Op. Exemption – North Coast Railroad Authority, F.D. 36481, served Feb. 18, 2010.

<sup>4</sup> NCRA’s trackage and interests south of Cloverdale are located in Sonoma and Marin Counties, CA.

embargo, there has been no freight rail traffic on any portion of the NCRA system north of MP 62.9 since 1998.<sup>5</sup> The only rail traffic has been excursion (tourist) train use of a small portion of NCRA's line at Willits, by CWR's so-called "Skunk" train. There has thus been no freight rail traffic on any portion of the Line at issue in this proceeding since at least 1998.

At the time of the embargo, Northwestern Pacific Railway Co., LLC (NWPY) operated the line for NCRA. Subsequent to the embargo, NWPY entered into a lease and operating agreement with NCRA for the line,<sup>6</sup> but due to the embargo, NWPY did not provide freight rail service on the Line.<sup>7</sup> NWPY's lease terminated on October 31, 2005, pursuant to an agreement dated June 23, 2005. NWPY is defunct.<sup>8</sup>

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<sup>5</sup> In May 2011, FRA lifted the embargo from Windsor (MP 62.9) south to interchange at Lombard/Napa Junction. Because interchange is located on a branch, which has a similar MP number to Windsor (interchange is at MP 63.4), this can create confusion. This portion of the NCRA system is owned by SMART, with NCRA having a freight easement over the line. NWPCo operates the freight easement pursuant to a lease agreement with NCRA. Freight service on the Windsor to interchange portion of NCRA's system re-commenced in or about July 2011.

<sup>6</sup> NWPY – Lease and Op. Exemption, F.D. 33998, served Feb. 6, 2001.

<sup>7</sup> NWPY did provide service on a portion of NCRA's system south of Windsor, for a period of eight months.

<sup>8</sup> NWPY is a defunct LLC in the State of California for failure to pay taxes. Its last stated agent for service of process with the Office of the California Secretary of State was John Darling, who passed away on June 27, 2010.

<https://www.legacy.com/obituaries/elgin-courier-news/obituary.aspx?n=john-albert-darling&pid=143894313>



NCRA entered into a new lease for the entire line at issue with Northwestern Pacific Railroad Company (NWPCO), which assumed responsibility for rail operations pursuant to a change of operator's exemption in 2007.<sup>9</sup> Because of the embargo, NWPCO has had no rail operations on the small portion of the Line at issue in this proceeding (i.e., Willits MP 139.5 north to Outlet MP 142.5) which is covered by its lease since becoming operator pursuant to that lease in 2007.

Other related proceedings. (a) NCRA currently (March 9) expects to transfer all of its property and common carrier obligations from MP 89 (Mendocino/Sonoma County line near Cloverdale) to SMART pursuant to this Board's authorization at Sonoma-Marin Area Rail Transit District – Acquisition and Operation Exemption – North Coast Railroad Authority, FD 36481, served

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<sup>9</sup> NWPCO – Change in Operators Exemption – NCRA, et al, F.D. 35073, served August 30, 2007. While the lease broadly encompassed the entire line, it emphasizes the portion south of Outlet Station. The Change of Operators exemption in turn encompasses only Outlet Station (approximately MP 142.5) south. Because the operator exemption did not encompass the entire line, NWPY still has an apparent STB lease common carrier authorization from Outlet Station north. NWPCo has an STB lease common carrier authorization from Outlet Station south. NCRA has no record that either NWPCo or (now defunct) NWPY ever provided freight rail service on NCRA's line north of Willits. The NCRA/NWPY agreement dated June 23, 2005, at para. 3 requires NWPY (now defunct) to seek termination of its STB common carrier obligation. NWPY failed to do so north of Outlet Station before going defunct. As part of the process to ensure railbanking of the NCRA line from Willits north, NCRA plans to file an adverse discontinuance proceeding to remove defunct NWPY's common carrier obligation from the Line.

Feb. 18, 2021. NWPCo has recently filed a petition for exemption for discontinuance of its operating rights from MP 89 south to end of line.

(b) NCRA currently (March 9) expects to initiate adverse (third party) discontinuance proceedings to terminate defunct NWPY's operating rights before NCRA files its actual Notice of Exemption in this proceeding.

(c) NCRA currently (March 9) expects NWPCo to file a two-year out-of-service notice of exemption to discontinue its common carrier obligation for additional trackage in the Line encompassing the line from Commercial Street in Willits (MP 139.5) to end of NWPCo's leased line at Outlet Station, MP 142.5.

Skunk Railroad not impacted. The assets of California Western Railroad were acquired by Mendocino Railway out of bankruptcy pursuant to this Board's authorization in Mendocino Railway – Ab. Ex. – Assets of the The California Western Railroad, F.D. 34465, served April 9, 2004. Mendocino Railway has not operated its line for freight purposes. An affiliated entity known as Skunk Railway from time to time operates a tourist train and railbikes on a short segment at Fort Bragg, and a seasonal tourist train on a somewhat longer segment from the depot adjacent to NCRA's Willits Yard. There is no through service on the Mendocino Railway due to a collapsed tunnel which Mendocino has left unrepaired. Mendocino Railway has been effectively isolated from the interstate rail network due to the 1998 FRA embargo. However, Mendocino Railroad from Fort Bragg



(MP 0 on the old California Western system) to intersection with NCRA near Willits (MP 40 on the old California Western system) appears to remain under STB jurisdiction. NCRA has determined that abandonment and railbanking of its line north MP 139.5 (East Commercial Street) in Willits will not sever Mendocino Railroad from the interstate rail network inasmuch as the Mendocino line intersects and runs parallel to NCRA's line for approximately one mile to the south.

Future of the Line. Following abandonment, NCRA expects to retain ownership and become the interim trail manager for the railbanked lines – or transfer ownership to a new entity which will be interim trail manager for the railbanked lines. NCRA is prepared to continue the arrangement for Mendocino Railway's Skunk affiliate to continue to use approximately 1.5 miles of trackage to access and to turn excursion trains in the Willits Yard. NCRA otherwise expects to cooperate with the various counties and communities traversed by the Line to convert it into a railbanked rail trail. NCRA currently plans to preserve and to conserve all remaining bridges, tunnels, and depots still owned by NCRA on the line. NCRA has no plans at this time to conduct any salvage operations relating to rail and ties on the Line.

Alternatives. The alternative to abandonment is to not abandon the Line and to continue to retain it. This alternative is not satisfactory. NCRA has no operations on the Line, but will continue to incur managerial and opportunity costs that would

need to be covered by non-existent shippers, were the Line to be retained for rail purposes. According to dated estimates, the Line would cost at least \$100,000,000 to rehabilitate (e.g., repair bridges, repair tunnels, fix crossings, replace ties, restore gauge, fix drainage issues and wash-outs, and remove brush, rock debris, and vegetation so it can be accessed for these purposes). Independent estimates indicate NCRA's entire line would require \$600,000,000 to rehabilitate to competitive standards. Because of the location and geology of the area traversed, the line is subject to failure due to continued slides, wash-outs, and weather-related events requiring costly repairs to maintain rail service. Even if rehabilitated, the history of the Line (see History Report) indicates that these costs would likely recur at regular intervals rendering the expense of maintaining and operating a railroad on the Line at least as infeasible for private enterprise (as found by NWP, SP, and Eureka Southern) as it has turned out for the State of California.

Map. A map depicting the Line is attached as Exhibit A.

Additional information. Prior to completing this ER, NCRA consulted with the California State Transportation Agency (CalSTA) (which includes CalTrans) and the California Natural Resources Agency, and more specifically with consultants working for those agencies in the preparation of a state report (Assessment of the North Coast Railroad Authority and Viability of a Great Redwood Trail: Report to the Legislature, 2020) ("State Report") on this line required under SB 1029.



Copies of the State Report and its appendices may be found at

<https://calsta.ca.gov/subject-areas/reports>. The State Report focuses on issues relevant to the State of California should the property be converted into a trail. It also discusses portions of the NCRA system (in particular, MP 139.5 in Willits south to end of line) that are not part of this proceeding. NCRA accordingly regards the bulk of the report as beyond the scope of this ER/HR.<sup>10</sup> However, the report does have some areas of overlap. For purposes of efficiency and because State officials asked NCRA (itself an agency of the State) to avoid duplication, NCRA defers to and incorporates certain portions of the State Report where relevant to information required in this ER/HR.<sup>11</sup> NCRA has also sought information on historic sites along the rail line from the California State Historic Preservation Office (CalSHPO), but has not yet received any substantive response. See email correspondence attached as Exhibit C. The State Report covers historic sites and appropriate reference is contained herein.

As part of the consultation process, NCRA is circulating this ER/HR and inviting comments thereon to all officials and agencies listed in Exhibit D

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<sup>10</sup> The State Report accordingly discusses many matters on which NCRA has not developed facts, evidence, positions, and conclusions. Any citation to the report should not be construed as agreement with any particular statement or opinion in the State Report, except to the extent expressly so stated herein.

<sup>11</sup> NCRA feels that the most relevant areas of potential overlap are in response to items 7(iii) and 8 in the ER, and items 2, 6 and 7 in the HR.

approximately 60 days in advance of when NCRA expects to file its Notice of Exemption for a two-year out-of-service abandonment (49 C.F.R. 1152.50) with the STB. NCRA intends to file a copy of this ER/HR as part of that NOE, and will attach all comments received by NCRA prior to said filing in Exhibit E to this ER/HR. Starting Tuesday, March 17, 2020, the Board provides that all filings and other submissions with the Board should be made electronically. For further information on electronic filing, please see the Board's webpage at

<https://prod.stb.gov/proceedings-actions/e-filing/>

NCRA supplies a list of bridges, tunnels, and other structures (e.g., actual depots) for the Line (believed 50 years old or older) as Exhibits F, G, and H respectively. NCRA furnishes photos of same in Exhibits I, J and K respectively. NCRA attaches additional discussion of historic sites from the State Report as Exhibit L.

2. 49 C.F.R. 1105.7(e)(2): Transportation System.

*Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.*

Response: NCRA expects no impact on regional or local transportation systems and patterns, and no diversion of traffic. This Line has been embargoed since



1998 and the only rail operation upon it (about 1.5 miles of seasonal excursion train use in connection with the Willits depot) is expected to continue.

3. 49 C.F.R. 1105.7(e)(3): Land Use.

*(i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies.*

Response: NCRA is not aware of any inconsistency. All comments received from local governments to date are included in Exhibit E.

*(ii) Based on consultation with the U.S. Soil and Conservation Service, state the effect of the proposed action on any prime agricultural land.*

Response: NCRA is unaware of any adverse impact on any prime agricultural land. Table C-10 at p. C-30 of Appendix C to the State Report sets forth acreages for various habitats traversed by the Line at issue in this proceeding. The vineyard areas are all understood to be located south of MP 139.5, and in any event would not be adversely impacted. All comments received from U.S. S.C.S. to date are found in Exhibit E.

*(iii) If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by Sec. 1105.9.*

Response: NCRA does not believe the proposed abandonment will have any adverse impact on land or water uses within the designated coastal zones. All comments received the relevant coastal zone management agency to date are found in Exhibit E.

*(iv) If the proposed action is an abandonment, state whether or not the right of way is suitable for alternative public use under 49 U.S.C. 10905 and explain why.*

Response: The right of way is suitable for alternative public use under 49 U.S.C. 10905. The right of way traverses areas of great natural beauty and if converted to interim trail use would provide excellent hiking and back country experiences which would stimulate Northern California's tourist industry. The line has been proposed for conversion into "The Great Redwood Trail." The recent State Report acknowledges it "would provide a tourist attraction and active transportation commuter route." State Report at p. 6. "Railbanking the corridor would allow for interim trail use, preserve the corridor for future railroad use, and create an attractive tourist destination as well as scenic non-motorized commuter route." Id. at 11. For this and allied reasons, NCRA is supporting railbanking and interim trail use for the right of way.



4. 49 C.F.R. 1105.7(e)(4): Energy.

(i) *Describe the effect of the proposed action on transportation of energy resources.*

Response: None. The Line has been embargoed with no service since 1998.

(ii) *Describe the effect of the proposed action on recyclable commodities.*

Response: None. See Response to (i) above.

(iii) *State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.*

Response: The proposed action will have no effect on overall energy efficiency.

The line has been without service due to an embargo since 1998. The energy balance therefore cannot be impacted.

(iv) *If the proposed action will cause diversions from rail to motor carriage [above specified thresholds] quantify the net change in energy consumption and show the data and methodology used to arrive at the number given.*

Response: Given the embargo since 1998, there can be no possible diversion from rail to motor carriage. Thus, no further response is required.

5. 49 CFR 1105.7(e)(5): Air.

(i) *This subsection requests “anticipated effect on air emissions” if the proposed action will result in increases in rail, yard, or truck traffic above certain thresholds.*

Response: Due to the embargo since 1998, the proposed action will not result in any increases in rail, yard or truck traffic, certainly none that exceed the thresholds. Therefore, anticipated effect on air emissions is effectively none.

(ii) *In the event the proposed action is within a Clean Air Act class I or non-attainment area and rail, yard or truck traffic exceed certain thresholds, this subsection asks if expected increased emissions are within parameters established by the State Implementation Plan.*

Response: NCRA incorporates the first sentence of the Response to subsection (i) above, which renders this subsection moot.

(iii) *This subsection asks for information in the event the proposed action contemplates transportation of ozone depleting materials.*

Response: The proposed abandonment does not contemplate any transportation of ozone-depleting materials and this subsection is therefore not applicable.

#### 6. 49 CFR 1105.7(e)(6): Noise.

*In the event that the proposed action will exceed the air thresholds set forth in (5)(i), this subsection asks if certain noise thresholds will be exceeded and for related information.*

Response: The thresholds set forth in (5)(i) will not be exceeded; therefore, this subsection is not applicable.

#### 7. 49 CFR 1105.7(e)(7): Safety.



(i) *Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).*

Response: Abandonment of the line will have no adverse impact on public health and safety.

(ii) *In the event transportation of hazardous materials is expected, this subsection asks for germane information.*

Response: Abandonment of an embargoed line will not result in any expected transportation of hazardous materials so this subsection is not applicable.

(iii) *If there are any known hazardous waste sites or sites where there have been known hazardous waste spills on the right of way, identify the location of those sites and the types of hazardous materials involved.*

Response: There have been potentially hazardous waste spill sites. NCRA's outside engineering firm (ARE Corp., per David Anderson) has supplied the following link describing potential spill sites:

[https://www.dropbox.com/s/it3r2dco5waazny/Waste%20Site%20Summary%20with%20Site%20layouts\\_reduced.pdf?dl=0](https://www.dropbox.com/s/it3r2dco5waazny/Waste%20Site%20Summary%20with%20Site%20layouts_reduced.pdf?dl=0)

A summary of those sites is set forth in Exhibit M. In addition, Table C-9 at pp. C-26 to C-29, in Appendix C to the State Report summarizes the State's findings on possible current or former remediated hazardous waste sites. In addition, Table C-7 at pp. C-15 to C-23, in Appendix C to the State Report, contains a list of abandoned rail equipment, structures, and rail debris within the corridor. It is possible that some of these items may be associated with hazardous waste. For

the convenience of reviewers, hard copy of the pages from Appendix C to the State Report referenced above are also included in Exhibit M.

8. 49 CFR 1105.7(e)(8): Biological Resources.

(i) *Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as critical habitat, and, if so, describe the effects.*

Response: No construction or removal activities will occur in or around the right of way to achieve this abandonment. NCRA accordingly does not believe the abandonment will have any adverse impact on surrounding habitat or species.

However, NCRA has determined that there are protected species in the three counties involved.<sup>12</sup> By provision of this ER/HR, NCRA is consulting with U.S. Fish and Wildlife Service and all responses to date are in Exhibit E.

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<sup>12</sup> Per the relevant Fish and Wildlife website, the listed or threatened species for each county are as follows:

Mendocino County: <https://ecos.fws.gov/ecp0/reports/species-by-current-range-county?fips=06045>

Trinity: <https://ecos.fws.gov/ecp0/reports/species-by-current-range-county?fips=06105>

Humboldt: <https://ecos.fws.gov/ecp0/reports/species-by-current-range-county?fips=06023>



(ii) *State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.*

Response: The NCRA's line passes through or alongside the eastern boundaries of portions of Humboldt Bay National Wildlife Refuge, essentially parallel to Highway 101, and touches a corner of Mad River Wildlife Area. In addition, the line passes through an adjacent facility owned by the City of Arcata known as the Arcata Marsh and Wildlife Sanctuary, which is Arcata's innovative wastewater treatment facility. A portion of the line is adjacent to the NE corner of Humboldt Redwoods State Park. NCRA anticipates no adverse effects upon any of these facilities from the proposed action. Much of NCRA's line is adjacent to the Eel River, which is a Wild and Scenic River. NCRA does not believe that the proposed action before STB concerning this line will pose adverse impacts on the Wild and Scenic River. The Wild and Scenic River website indicates that the following agencies are "managing agencies" for the Eel River: Bureau of Land Management, Arcata Field Office, California Resources Agency, Round Valley Indian Reservation, Six Rivers National Forest and Mendocino National Forest. For sake of completeness, all these entities are being served with a copy of this ER/HR and any comments received to date are contained in Exhibit E.

9. 49 CFR 1105.7(e)(9): Water.

(i) *Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.*

Response: NCRA does not propose to remove or to alter the roadbed underlying the Line to be abandoned by way of excavation or other ground disturbing activity.

NCRA therefore expects no soils to be disturbed as a result of the proposed abandonment, and it follows that no storm water mitigation measures including but not limited to a National Pollutant Discharge Elimination System permit, will be required. There are no plans for in-stream work or dredge and/or use of fill materials in connection with the proposed abandonment. The abandonment therefore will not result in water quality impacts. NCRA has nonetheless consulted with state and federal officials via circulation of this ER/HR per Exhibit D and all responses to date are set forth in Exhibit E.

(ii) *Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act (33 U.S.C. 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects.*

Response: NCRA does not plan to remove or alter the roadbed underlying the Line, or undertake in-stream work or dredge, or use fill materials. The geometry of the roadbed will not be altered. No discernible effects on either 100-year flood plains or adjacent wetlands are expected in connection with the proposed abandonment. NCRA therefore does not believe Section 404 permit will be



required in connection with the proposed abandonment. NCRA is consulting with the relevant U.S. Army Corps of Engineers district per provision of this ER/HR and any response is set forth in Exhibit E.

*(iii) State whether permits under section 402 of the Clean Water Act (33 U.S.C. 1342) are required for the proposed action.*

Response: NCRA is not proposing any salvage of the Line at this time. NCRA anticipates that the bridges, tunnels, and roadbed will remain intact. NCRA in all events does not anticipate excavation or other ground-disturbing activity.

Therefore, no storm water permitting, including a National Pollutant Discharge Elimination System permit, is expected to be required. NCRA expects the proposed abandonment to have no impact on water quality and that additional permitting under section 402 will not be required. NCRA is consulting with EPA and state officials and any responses to date are set forth in Exhibit E.

10. 49 CFR 1105.7(e)(10): Proposed mitigation.

*Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.*

Response: The proposed abandonment is not expected to produce adverse environmental impacts for the reasons set forth above. The Line traverses areas of great natural beauty and is suitable for a public trail and greenway. California state legislation now contemplates that the Line at issue in this proceeding is

appropriate for trail and greenway uses. NCRA intends mitigate any possible adverse consequences that would flow from abandonment authorizations by cooperating in railbanking the property pursuant to 49 U.S.C. 1247(d) to keep it intact. In the already quoted words of the State Report (at p. 11), “[r]ailbanking the corridor would allow for interim trail use, preserve the corridor for future railroad use, and create an attractive tourist destination as well as a scenic non-motorized commuter route.”

## HISTORY REPORT

49 C.F.R. 1105.8(d) preface.: Section 1105.7(e)(1) information.

Response: NCRA hereby incorporates section 1105.7(e)(1) from the foregoing Environmental Report.

1. 49 C.F.R. 1105.8(d)(1): USGS or equivalent map.

Response: See Exhibit A. Maps 8 to 25 of Appendix A of the State Report provide additional mapping of the Line.

2. 49 U.S.C. 1105.8(d)(2): Description.



*A written description of the right of way (including approximate widths, to the extent known, and the topography and urban and/or rural characteristics of the surrounding area.*

Response: The right of way is for the most part single track, of varying width, following the Eel River Valley north of Willits to terminus at Eureka. The width varies, but is typically 30 feet each side of centerline. Table C-10 at p. C-30 of Appendix C to the State Report summarizes (by cumulative acreage) the habitats traversed. The bulk of the Line at issue is in the Eel River Canyon Section, Northern Section, and Branches (NCRA understands that the AMR subsidiary is treated by the State as part of the Korblex Branch). The State Report table indicates that the habitat is partly urban, but mostly chaparral or forest of various natures. North of Willits, the right of way passes through rugged terrain prone to wash-outs and slides, particularly along the Eel. Urban areas are chiefly around Humboldt Bay (Eureka area).

3. 49 U.S.C. 1105.8(d)(3): Photographs.

*Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area.*

Response: NCRA supplies a list of bridges, tunnels, and other structures (e.g., actual depots) for the Line (believed 50 years old or older) as Exhibits F, G, and H respectively. Photographs of same are presented in Exhibits I, J and K

respectively. NCRA will supply a thumb drive (containing high resolution photos) covering all these items to CalSHPO providing an appropriate mailing address is provided. NCRA will also provide a thumbdrive to STB OEA upon request.

4. 49 U.S.C. 1105.8(d)(4): Relevant dates.

*The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent that information is known.*

Response: This information, to the extent known, is set forth in table form in Exhibits F, G, and H.

5. 49 U.S.C. 1105.8(d)(5): History.

*A brief narrative history of carrier operations in the area, and an explanation of what, if any changes are contemplated as a result of the proposed action.*

Response: First, no changes (increase or decrease) of operations are involved in the proposed action. This line has been embargoed since 1998. NCRA proposes no change in carrier operations in that there will continue to be no operations upon abandonment. NCRA anticipates that the line will be railbanked under 16 U.S.C. 1247(d). It will thus remain under federal (STB) jurisdiction and will be available for interim trail use.

It is difficult to be brief in summarizing the history of this line from inception to present. NCRA has retained the assistance of Josh Buck, BA, History, Humboldt State University (senior thesis was the history of the line) to assist in preparing the

Narrative History attached as Exhibit N and to prepare the bibliography attached as Exhibit O. (The photographs accompanying this HR were also either taken by Mr. Buck or are from his collection.)

The State Report at pp. 14-18 contains a chapter entitled “History of NCRA and the State of California.” The State Report actually starts with the inception of the line as Northwestern Pacific Railroad at the Ferry Building in San Francisco (MP 0.0), extending ultimately to Korbel (the end point of the Annie and Mary subsidiary of NCRA, approximately 316 miles. However, the bulk of the State Report discussion focusses on the period 1992 (purchase by NCRA) to date.

6. 49 C.F.R. 1105.8(d)(6): Documents.

*A brief description of documents in the carrier’s possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic.*

Response: NCRA is unaware of the location of any engineering drawings within its currently existing files. NCRA’s outside engineering company believes that some material may be held by Union Pacific Railroad, successor to Southern Pacific, past parent of Northwestern Pacific Railroad.

7. 49 C.F.R. 1105.8(d)(7): Qualification for listing on the National Register and presence of Archeological Resources.



*An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 CFR 60.4),<sup>13</sup> and whether there is a likelihood of archeological resources or any previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies, and universities).*

Response: NCRA defers to the opinions expressed in the State Report. The portions of the State Report relevant to the Line at issue are found in Appendix D at pp. D-6 to D-14 (discussion) and Table D-1 at pp. D-15 to D-16 (table of "Potentially Significant Historic and Archeological Resources Within or Adjacent to the Rail Corridor"). Hardcopy of these pages may be reviewed in Exhibit L.

8. 49 C.F.R. 1105.8(d)(8): Ground disturbance.

*A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes) and the surrounding terrain.*

Response: The railroad from Willits north to the area of Humboldt Bay traverses mountainous terrain prone to rock fall, tunnel collapse, slides and washouts, especially in the Eel River Canyon. Substantial portions of the line north of Willits are difficult to access except by hiking, rafting or kayaking. In and around Humboldt Bay, there are swampy conditions. This may affect recovery of

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<sup>13</sup> Found at this link: <https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol1/pdf/CFR-2012-title36-vol1-sec60-4.pdf>

resources. Mr. Buck has prepared Exhibit P, which is a list of major areas for slides and washouts. The State Report summarizes landslides and slope failures in Table C-8, relevant pages are C-19 to C-23 of Appendix C, also attached in Exhibit P. Potentially hazardous waste sites are discussed in response to item 7(iii) in the ER, supra. See Exhibit M.

9. 49 C.F.R. 1105.8(d)(9): Additional information.

*Within 30 days of receipt of the historic report, the State Historic Preservation Officer may request the following additional information regarding specified nonrailroad owned properties or groups of properties immediately adjacent to the railroad right-of-way: photographs of specified properties that can be readily seen from the railroad right-of-way (or other public rights of way adjacent to the property) and a written description of any previously discovered archeological sites, identifying the location and type of site (i.e., prehistoric or native American).*

Response: No information sought as of the date of initial service of this report.

Exhibits

Exhibit A – Map

Exhibit A1 – Willits North

Exhibit A2 – NCRA system as of October 2020

Exhibit B – Arcata & Mad River Jurisdictional Issue

Exhibit B1 – NCRA Resolution 2008-11

Exhibit B2 – “Judge Clears Way for Sale of AMRR” (8/9/1987)

Exhibit B3 – NCRA Operations on Annie and Mary, 1993-94 (photographs)

Exhibit B4 – 1993 and 1996 Time Tables (relevant excerpts)

Exhibit B5 – “A&MR Key to New NWP Success” (8/1995)

Exhibit B6 – “Railroad Starts Work on Tracks”

Exhibit B7 – “Rail Replacement Wait May be Long” (12/7/1997)

Exhibit C – Correspondence with CalSHPO to date

Exhibit D – Letter to agencies, et al

Exhibit E -- Comments received to date [supplied at filing of NOE]

Exhibit F – List of Bridges (believed 50 years old or older)

Exhibit G – List of Tunnels (believed 50 years old or older)

Exhibit H – List of Structures (believed 50 years old or older)

Exhibit I – Pictures of items in Exhibit F (Bridges)

Exhibit J – Pictures of items in Exhibit G (Tunnels)

Exhibit K – Pictures of items in Exhibit H (Structures)

Exhibit L – State Report Historic and Archeological Resource Summary

Exhibit M – Potential Hazardous Waste sites

Exhibit N – Narrative History of Line

Exhibit O – Bibliography

Exhibit P – Major Slides



## Exhibits

Exhibit A – Map

Exhibit A1 – Willits North

Exhibit A2 – NCRA system as of October 2020

# NCRA Main Line

## From Willits North to Eureka

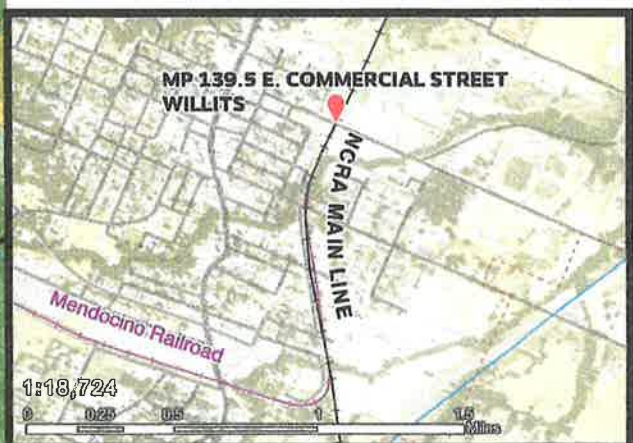
Including Branches and A&MR Subsidiary

### LOCATION



### LEGEND

- County Line
- River or Creek
- Land Contours (50m)
- U.S. Route 101
- State Highway
- Road
- City Boundary
- Railroad
- Park Land
- Reservations
- Milepost Marker

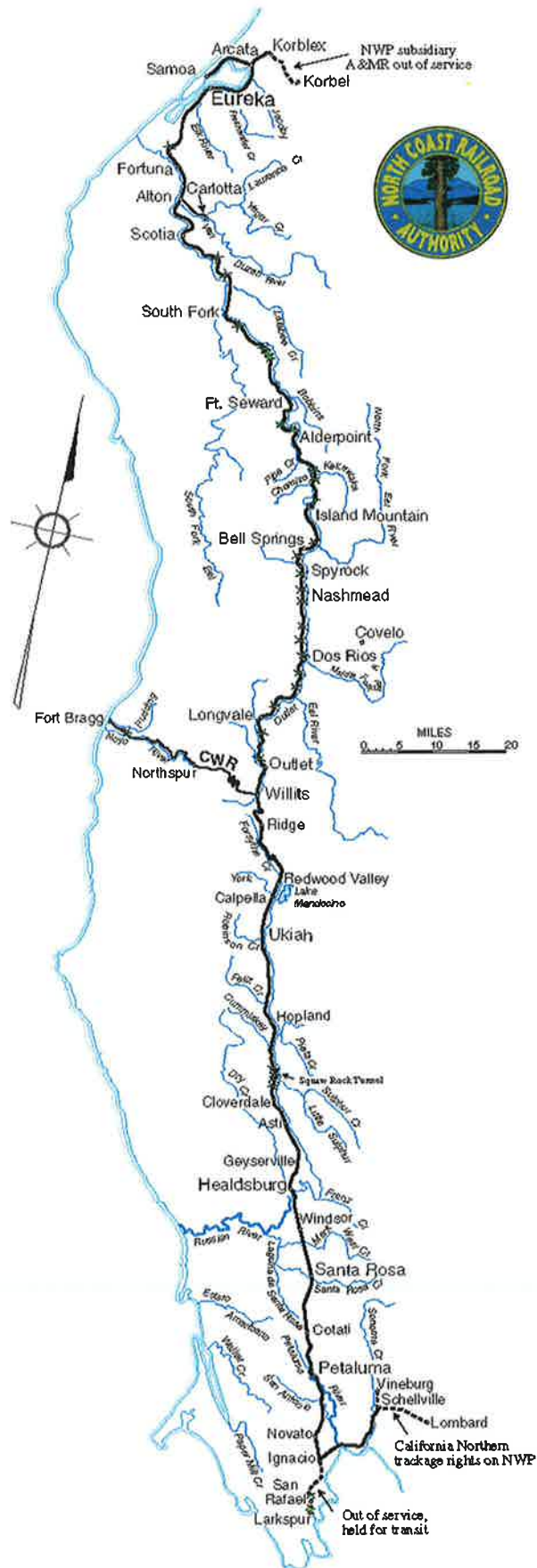


North American Datum of 1983 (NAD83)

Last Updated: September 2020  
Cartographer: Leo J. DiPierro

This map is not a legal document. Some features may be generalized for map scale. Data acquired from ESRI, CA Open Data Portal, California Department of Transportation, USGS, Humboldt County GIS, U.S. Census, Berkeley Library Gooddata, DataBasin.





## Route map of North Coast Railroad Authority (2020)

(from NCRA website)

Korbel = MP 301.8

Korblex = MP 295.5

Outlet = MP 142.5

Willits = MP 139.5

Healdsburg = MP 68

Petaluma = MP 38.5

Novato = MP 30

Ignacio = MP 25.6

Lombard/Napa Junction = MP 63.4  
(redesignated MP 49.8 S)

[Mileposts approximate]

## Exhibit B – Arcata & Mad River Jurisdictional Issue

## Exhibit B: Arcata & Mad River Jurisdictional Issue

NCRA includes the Arcata & Mad River (“Annie and Mary”) subsidiary in this Notice of Exemption proceeding to the extent STB concurs with NCRA that the Annie and Mary is a line subject to the agency’s abandonment jurisdiction and is not a “spur” outside the agency’s jurisdiction. Consistent with Resolution 2008-11 (attached as B-1), NCRA views the Annie and Mary as subject to the agency’s abandonment jurisdiction, taking the position that NCRA and its predecessor Eureka Southern used the line for common carrier purposes and NCRA now appropriately should seek and receive abandonment authorization.

NCRA acknowledges that ICC authorized the Arcata & Mad River Rail Road Company line for abandonment in Arcata and Mad River Rail Road Company – Abandonment Exemption – in Humboldt County, AB 241X, served April 9, 1985, 1985 ICC Lexis 467, stay denied 1985 ICC Lexis 385 (May 24, 1985), reconsideration denied 1986 ICC Lexis 382 (March 19, 1986). However, at that time, the Eureka Southern Railroad (“Eureka Southern”) was expressing interest in acquiring Annie and Mary, and subsequently did acquire it from its then owner, Simpson Timber Company, while Eureka Southern was in bankruptcy.<sup>1</sup> NCRA

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<sup>1</sup> Eureka Southern evidently expected to enter into a haulage agreement with Simpson Lumber to pay for the purchase, transporting freight from Korbel to the mainline by rail rather than truck. “Judge Clears Way for Sale of AMRR,” news



subsequently acquired Eureka Southern out of bankruptcy in 1992. Both Eureka Southern and NCRA operated the Annie and Mary for freight rail purposes to serve two lumber companies until 1994,<sup>2</sup> and former railroad personnel around at the time have orally stated to NCRA consultants that FRA ordered the line shutdown for safety reasons.<sup>3</sup> Two relevant NCRA Time Tables (1993 and 1996) both include Annie and Mary stations on NCRA's Eureka Line, although the 1996 Time Table notes third page, item 9) Korblex to Korbel (i.e., Annie and Mary) by 1996 was out of service.<sup>4</sup> Annie and Mary thus was used for line hauls into and out of Blue Lake and Korbel at least through 1993-94. As part of its acquisition of its rail line south of Willits in 1996, NCRA applied for and received substantial

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clipping dated 8/9/87 from Humboldt State Univ. library, collection of Josh Buck, Exhibit B-2.

<sup>2</sup> For Eureka Southern operations, see Jim Shaw, *Shortlines of Northern California*, Vol. I, at p. 90 (2019) (Eureka Southern locomotive No. 70 – former California Traction company – pulling a string of flat cars to mill at Korbel for loading in 1990). For operations after NCRA's 1992 acquisition of Eureka Southern, see photographs in Exhibit B-3 from collection of Josh Buck (copied with permission of the photographer(s)). The third photo shows the same engine portrayed in Shaw, *supra*, in operation for NCRA.

<sup>3</sup> According to Frank Lovio (Roadmaster for the railroad during the 93-94 period, see 1993 Time Table, Exhibit B-4, *infra*), Mr. Lovio was on site with an FRA inspector when an engine pulling four lumber cars crossed the Warren Creek Bridge on Annie and Mary. They both “watch[ed] the bridge shake back and forth,” the FRA inspector backed into a barbed wire fence to reach safety if it collapsed, and NCRA stopped running the train afterward. Interview of Frank Lovio by Josh Buck, 9 December 2017. Mr. Lovio believed the lumber mills caused the problem by overloading the flats. *Id.*

<sup>4</sup> Relevant portions of the 1993 and 1996 Time Tables are attached in Exhibit B-4.

rehabilitation grants, of which \$4.5 million was intended to rehabilitate the Annie and Mary.<sup>5</sup> Annie and Mary track was removed, but Mr. Hauser (director of the NCRA's railroad) represented that rail replacement would occur in 18 to 24 months.<sup>6</sup> The rehabilitation funds were necessarily diverted to repair storm damage to the mainline in the 1996-97 period.<sup>7</sup> In 1998, essentially the entire central and northern portion of the NCRA system was embargoed, so rehabilitation of Annie and Mary did not take place.

In its reconsideration decision in the Annie and Mary abandonment proceeding, ICC noted that certain issues raised by the rail labor interests in connection with Eureka Southern acquisition of Annie and Mary would be addressed should Eureka Southern actually apply to the agency for acquisition authority.<sup>8</sup> NCRA can find no record that Eureka Southern, which was in bankruptcy, applied for such authority for its acquisition, which was during the 1987-88 time period. However,

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<sup>5</sup> "A&MR Key to New NWP Success," The Headlight, August 1995, clipping from Humboldt State Univ. library, collection of Josh Buck; "Deal Final in Purchase of Rail Line," Ukiah Daily Journal 20 April 1996 (both in Exhibit B-5).

<sup>6</sup> "Railroad Starts Work on Tracks," Eureka Times Standard, collection of Josh Buck, Exhibit B-6.

<sup>7</sup> "Rail Replacement Wait May Be Long", 12/7/1997 news clipping, collection of Josh Buck, Exhibit B-7 (Hauser indicates diversion of rehab funds was with concurrence of the federal government and the two shippers – Simpson and Blue Lake Forest Products).

<sup>8</sup> 1986 ICC Lexis 382 (March 19, 1986) at p. \*11.

the evidence is consistent with a resumption of common carrier operations on the line subsequently by Eureka Southern.

NCRA adopted Resolution 2008-11 (August 13, 2008) (Exhibit B-1) stating that it “acquired [Annie and Mary] as an operating Rail Road and continued to operate the ... Line and never took formal action to abandon the ... Line even during the period of non-use ....” However, as noted, by 2008, the entire northern portion of the line was embargoed, and the Resolution accordingly indicated that it was “unlikely and infeasible that the NCRA will operate trains on the [Annie and Mary] roadbed in the near future....” The Resolution stated that it was “appropriate that NCRA retain the right to resume rail freight service on the [Annie and Mary] route, if possible, should the need for such service arise....” The Resolution pledged the agency to cooperate with City of Blue Lake and others in “railbanking” the line “including filing an appropriate application with the Surface Transportation Board....” The resolution has not been rescinded.

NCRA believes that the evidence concerning Annie and Mary is consistent with a determination that Simpson Lumber (the then-owner) did not consummate the abandonment, but instead transferred the line to Eureka Southern for continued rail operation, which continued under NCRA. In that case, Eureka Southern should have sought acquisition authority but did not. However, due to use for common carrier purposes by Eureka Southern and by NCRA, STB retains abandonment



jurisdiction over the Annie and Mary. Furthermore, NCRA in accordance with Resolution 2008-11 must then seek abandonment/railbanking authority from this Board. NCRA also wishes to avoid a situation in which failure to include Annie and Mary in this proceeding constitutes a “stranded segment” problem that might hold up the remainder to the NCRA abandonment proceeding in this docket (AB 1305X).

NCRA is prudently laying out the facts above in the hope of avoiding disputes over agency jurisdiction that might delay the effectiveness of issuance of a railbanking order for any portion of the line that qualifies for an STB Notice of Interim Trail Use. NCRA seeks a NITU that covers the Annie and Mary. Should the agency view its jurisdiction as lapsed, NCRA plans to treat the Annie and Mary as eligible for at least “private” railbanking pursuant to Southern Pacific Transportation Company – Exemption – Abandonment of Service in San Mateo County, CA, AB 12 (Sub-no. 118X), served Feb. 20, 1991, 1991 ICC Lexis 54 at \*12 [spur outside ICC jurisdiction may be privately railbanked under the language of 16 U.S.C. 1247(d)], and other authorities.

NCRA in all events wishes to keep all of its lines intact and available for rail reactivation as well as trail use in the interim, consistent with 16 U.S.C. 1247(d), at the conclusion of this proceeding.

Exhibit B1 – NCRA Resolution 2008-11

Exhibit B2 – “Judge Clears Way for Sale of AMRR” (8/9/1987)

Exhibit B3 – NCRA Operations on Annie and Mary, 1993-94 (photographs)

Exhibit B4 – 1993 and 1996 Time Tables (relevant excerpts)

Exhibit B5 – “A&MR Key to New NWP Success” (8/1995);

“Deal Final in Purchase of Rail Line”

Exhibit B6 – “Railroad Starts Work on Tracks”

Exhibit B7 – “Rail Replacement Wait May be Long” (12/7/1997)

## Exhibit B1 – NCRA Resolution 2008-11



**RESOLUTION**  
**Of the**  
**BOARD OF DIRECTORS**  
**Of**  
**NORTH COAST RAILROAD AUTHORITY**

**IN THE MATTER OF:**

Recognizing the Arcata and Mad River  
Railroad as Being Appropriate for  
Multi-Modal Transportation Use.

Resolution No. 2008 - 11

WHEREAS; The Arcata and Mad River Railroad's predecessor, the Union Wharf and Plankwalk Company, was incorporated on December 15, 1854, and operated a horse-drawn railroad, generally considered to be the first railroad in California; and

WHEREAS; the next operator, the Arcata Transportation Company, was incorporated on June 14, 1875, and converted the railroad to steam; and

WHEREAS; on July 29, 1881, the Arcata and Mad River Railroad (A&M) was incorporated; and

WHEREAS; in 1914, with the coming of the Northwestern Pacific Railroad (NWP) and the connection to the rest of the nation, the Arcata and Mad River Railroad agreed to the junction at Korblex, NWP post mile 295.57 (the north side of West End Road), as the division between the A&M and NWP; and

WHEREAS; the Eureka Southern Railroad had purchased the NWP and in September 1988 also purchased the A&M; and

WHEREAS; the Eureka Southern Railroad continued to operate trains on both systems but was forced into bankruptcy due to numerous factors; and

WHEREAS; the North Coast Railroad Authority (NCRA) was formed by the State of California; and

WHEREAS; after NCRA acquired the A&M Line it continued to run trains thereon until the A&M Line shut down due to safety concerns; and

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WHEREAS; the NCRA acquired the A&M Line as an operating Rail Road and continued to operate the A&M Line and never took formal action to abandon the A&M Line even during the period of non-use, nor does the NCRA consider the A&M Line abandoned; and

WHEREAS; the A&M roadbed is outside of the prospective contract limits of the NCRA agreement with the Northwestern Pacific Company; and

WHEREAS; it is unlikely and infeasible that the NCRA will operate trains on the A&M roadbed in the near future; and

WHEREAS; it is appropriate that NCRA retain the right to resume rail freight service on the A&M route, if possible, should the need for such service arise; and

WHEREAS; the cities of Arcata and Blue Lake and the County of Humboldt have expressed an interest in utilizing the A&M roadbed for a multi-modal transportation use.

NOW THEREFORE BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE NORTH COAST RAILROAD AUTHORITY as follows:

1. NCRA expresses its willingness to cooperate with the City of Blue Lake and others in railbanking, and/or other appropriate means of effectuating multi-modal transportation use of the A&M Line in its entirety from NWP mile post 295.57 (the north side of West End Road) to just east of Blue Lake and will cooperate with such process, including filing an appropriate application with the Surface Transportation Board, at such time as a local entity enters into an agreement with the NCRA to assume the duties of Trail Manager as required by federal law, or a local or non-profit entity assumes responsibility equivalent to that of Trail Manager, as required by federal law and NCRA's Guidelines for Trail Projects.
2. This Resolution will remain in effect unless rescinded. The Board, in or after September 2009, may review this Resolution.
3. The Executive Director of NCRA or the designee thereof, is NCRA's sole spokesman to any public agency regarding the subject matter of this Resolution, including, but not limited to the City of Blue Lake, the City of Arcata, the County of Humboldt, the

Surface Transportation Board, the Department of Transportation, and/or the California Transportation Commission.

Introduced and adopted this 13<sup>th</sup> day of August 2008 at a regular meeting of the Board of Directors of North Coast Railroad Authority by the following vote:

AYES:

NOES:

ABSENT:

ATTEST:

  
ALLAN HEMPHILL  
Chairman of the Board

MITCH STOGNER, Secretary



Exhibit B2 – “Judge Clears Way for Sale of AMRR” (8/9/1987)



**Exhibit B3 – NCRA Operations on Annie and Mary, 1993-94 (photographs)**



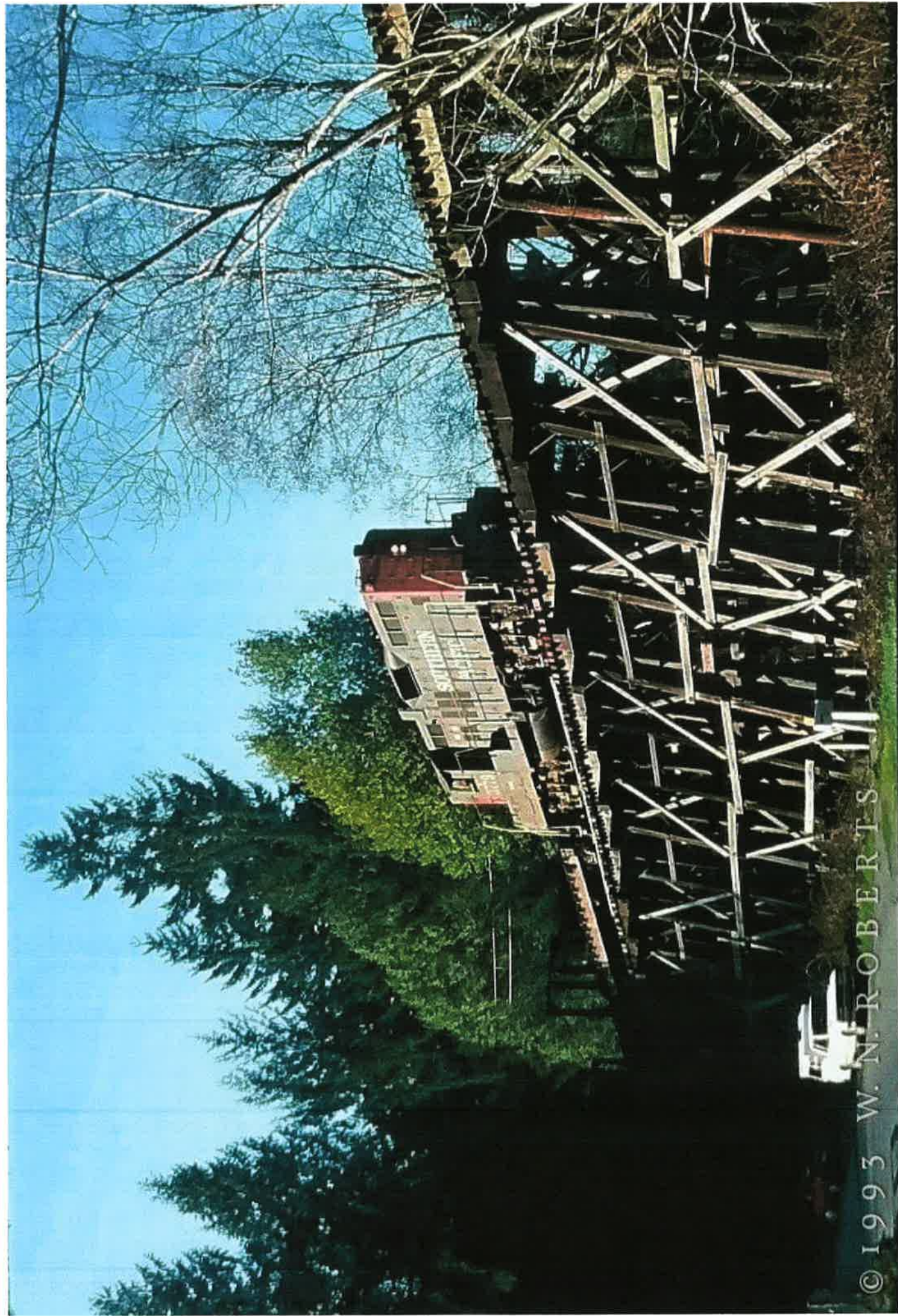
Photo A: A North Coast Railroad (NCR) freight on February 14, 1993, at the Warren Creek Crossing. Note that the locomotive is labeled as Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive can be found in the Eureka Rail Yard (as of 2021).  
Bill Roberts Photo (all photos copyright but reprinted with his permission)

Photo B: A North Coast Railroad (NCR) freight on February 14, 1993, at the Warren Creek Crossing. Note that the locomotive is labeled as a Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive can be found in the Eureka Rail Yard (as of 2021).  
Bill Roberts Photo. Copyrighted, reprinted by permission.

Photo C: A North Coast Railroad (NCR) freight along West End Road in approximately on June 5th, 1992. Note that locomotive is labeled as Central California Traction No. 70. No. 70 was purchased secondhand and operated on the NCR until closure in February 1998. This locomotive was scrapped onsite at the Eureka Yard in 2015. Bill Roberts Photo. Copyrighted, reprinted by permission.

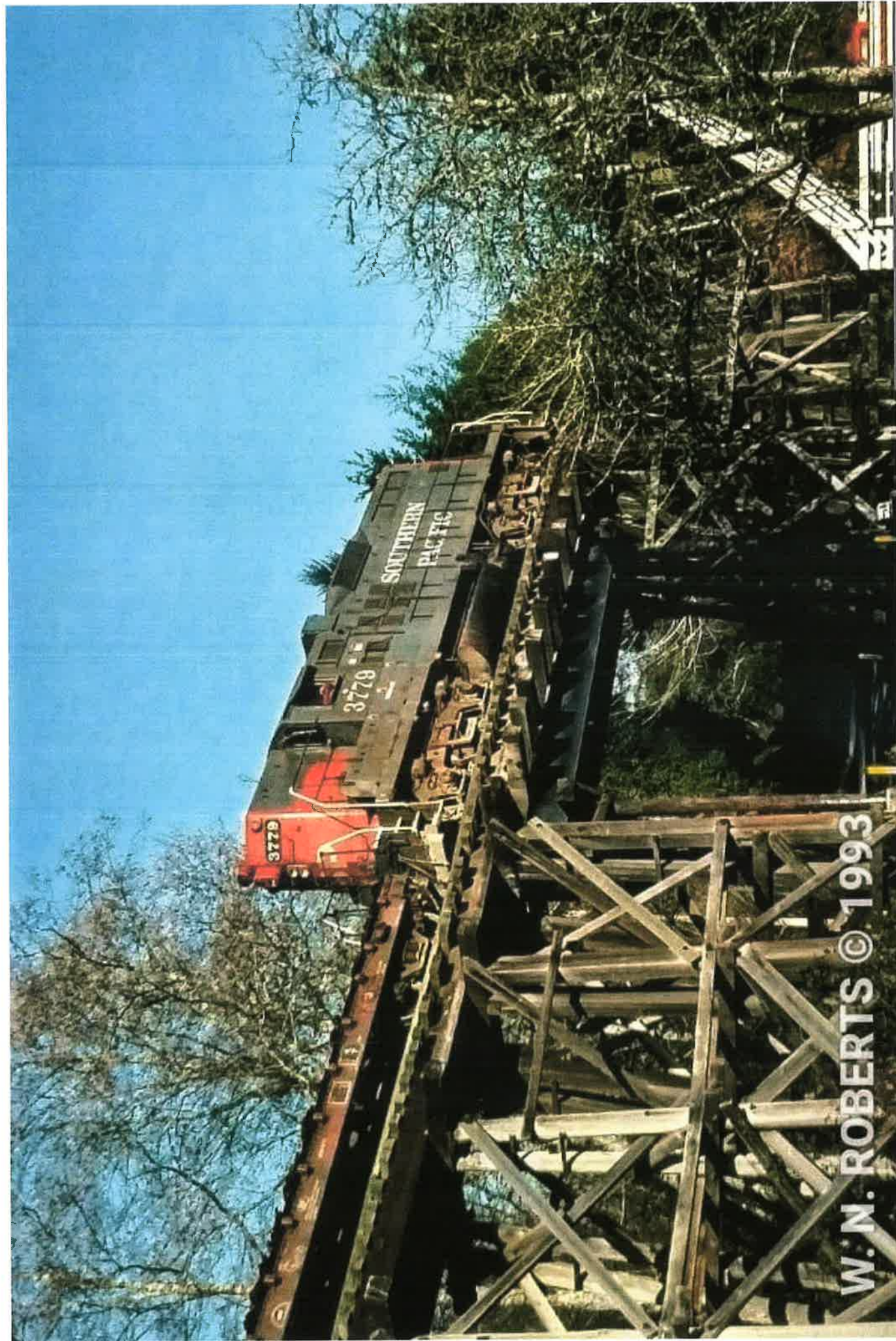
Photo D: A North Coast Railroad (NCR) freight hauling over the Minor Creek trestle on February 14, 1993. Note that the locomotive is labeled as Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. Bill Roberts photo. Copyrighted, reprinted by permission.

Photo E: A North Coast Railroad (NCR) freight pulling a train through the crossing across Maple Creek Road near the mill at Korbel on February 14, 1993. Note that the locomotive is labeled as a Southern Pacific No. 3779. It was purchased secondhand and operated on the NCR until closure in February 1998. Copyrighted, reprinted by permission.



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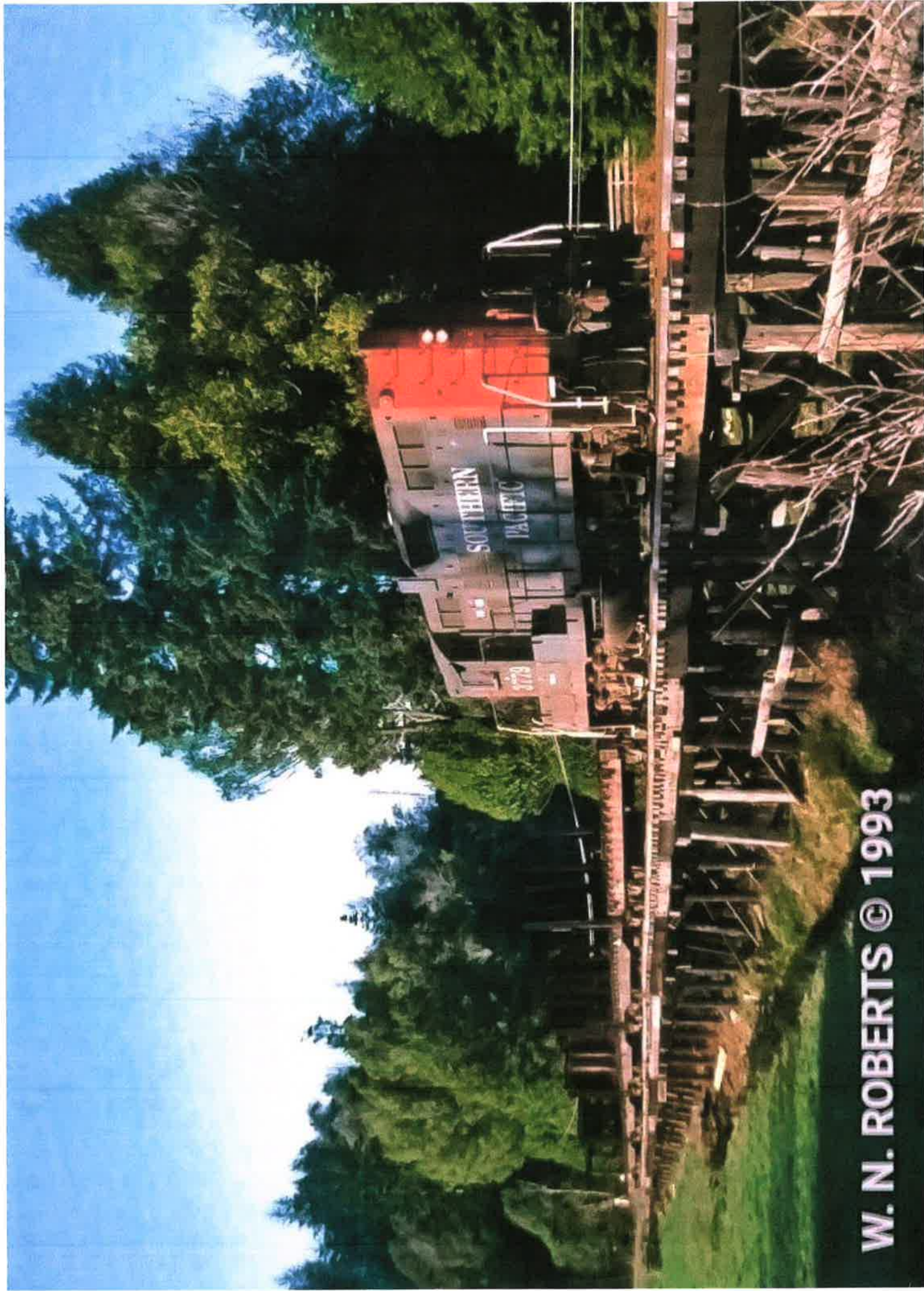
W. N. ROBERTS © 1993





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**Exhibit B4 – 1993 and 1996 Time Tables (relevant excerpts)**

**RULE 226. ABSOLUTE BLOCK REGISTER TERRITORY:**

New rule is added: Absolute block register territory will be designated in timetable. A register labeled "Absolute Block Register Territory" will apply only on that designated territory. A train or operator in charge of on-track equipment is authorized to occupy Absolute Block Register Territory under the following conditions:

1. Following information must be entered in register on the first blank line:

| Train or<br>on-track<br>equipment | Conductor or<br>MotW<br>employee | Date | Time<br>Territory<br>Occupied | Time<br>Territory<br>Cleared |
|-----------------------------------|----------------------------------|------|-------------------------------|------------------------------|
|-----------------------------------|----------------------------------|------|-------------------------------|------------------------------|

| A | B | C | D | E |
|---|---|---|---|---|
|---|---|---|---|---|

COLUMN REQUIRED ENTRY

A- Enter the train identification or MotW and track equipment number.

B- Enter last name of conductor or operator in charge of on-track equipment.

C- Current date.

D- Time entry is made in register.

2. If the territory is occupied by a preceding train movement entry cannot be made on register until engineer of each preceding movement has been contacted and advised territory will be jointly occupied by a train. Maintenance of Way on-track equipment and/or another train, all train movements must be made at RESTRICTED SPEED prepared to stop short of men and equipment fouling the track within the territory.

E- Time territory cleared.

3. After movement has been completed, the time the territory was cleared must be entered in Column E. A line is then to be drawn through the entire entry. The required exit entry may be completed by any authorized employee.

**RULE 450. TRACK BULLETINS:**

Example of Form A Track Bulletin:

**NORTH COAST RAILROAD**  
Track Bulletin Form A Number \_\_\_\_\_  
To: \_\_\_\_\_  
At: \_\_\_\_\_  
DO NOT EXCEED SPEED INDICATED BELOW BETWEEN  
TRAIN MPH RESTRICTION LIMIT

Complete: \_\_\_\_\_ Train Dispatcher:

Example of Form C Track Bulletin:

**NORTH COAST RAILROAD**  
Track Bulletin Form C Number \_\_\_\_\_  
To: \_\_\_\_\_  
At: \_\_\_\_\_

Complete: \_\_\_\_\_ Train Dispatcher:

**RULE 521(A). UNFORSEEN TRACK RESTRICTIONS:**

New rule is added: When it is necessary to transmit a track restriction not covered by a track bulletin directly to a train, it is to be accomplished as follows:

- (1) Train dispatcher must state his intentions to issue a track restriction.
- (2) Track restriction must be copied in writing by the receiving employee before it is repeated back to the train dispatcher.
- (3) Restriction will be issued using the following format:  
(TRAIN ID) DO NOT EXCEED (SPEED)  
BETWEEN (LIMIT) AND (LIMIT)
- (4) Track restriction may not be copied by an employee operating the controls of an engine of a moving train.

**RULE 622. SAFETY RULES:**

NCRR has adopted the current edition of Southern Pacific Lines' Safety and General Rules for all Employees.

**RULE 623. TRAIN HANDLING:**

NCRR has adopted the current edition of Southern Pacific Lines' Rules and Instructions Governing Air Brake System and Train Handling.

**LOCOMOTIVE LIST**

| Engine No. | Classification | Type | Dynamic Brake |
|------------|----------------|------|---------------|
| 3190       | Roadswitcher   | GP9  | STD           |
| 3857       | Roadswitcher   | GP9  | STD           |
| 3804       | Roadswitcher   | GP9  | STD           |
| 3779       | Roadswitcher   | GP9  | STD           |
| 3786       | Roadswitcher   | GP9  | STD           |
| 2872       | Roadswitcher   | GP9  | STD           |
| 70         | Roadswitcher   | GP7  | STD           |

# NORTH COAST RAILROAD



## TIME TABLE No.

# 1

IN EFFECT AT

12:01 A.M. Pacific Time  
Thursday, September 16, 1993

This Time Table is for the exclusive use  
and guidance of Employees.

**David R. Hebert**  
General Manager

**Clyde L. Ferguson**  
Trainmaster

**Frank B. Lovio**  
Roadmaster

Eureka, California



## EUREKA LINE

| Capacity of Sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |                         | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|-------------------------|-----------|----------------|-----------|
|                     |            | STATIONS                                  |                         |           |                |           |
|                     |            |                                           | KORBEL<br>9.0           | 301.8     | 302            | ABR       |
|                     |            |                                           | BLUE LAKE<br>5.6        | 300.8     | 301            |           |
|                     |            |                                           | KORBLEX<br>3.3          | 295.2     | 295            |           |
|                     |            |                                           | ARCATA<br>8.4           | 292.5     | 293            |           |
| Yard                | ADQPR      | R                                         | EUREKA YL<br>6.3        | 284.1     | 284            | 93        |
| 890                 | DA         |                                           | SOUTH BAY<br>11.7       | 277.8     | 278            | DTC       |
|                     |            |                                           | FORTUNA<br>1.6          | 266.1     |                |           |
| 3711                | DA         |                                           | ROHNERVILLE<br>1.8      | 264.5     | 265            |           |
| 1613                | DAR        | R                                         | ALTON<br>7.1            | 262.7     | 263            |           |
| 275                 | SPFE       |                                           | SCOTIA<br>1.8           | 255.6     | 256            |           |
| 2450                | DA         |                                           | GLYNN<br>16.5           | 253.8     |                |           |
| 2244                | DAP        |                                           | SOUTH FORK<br>12.3      | 237.3     | 237            |           |
| 300                 | NC         |                                           | EEL ROCK<br>8.5         | 225.1     | 225            |           |
| 2479                | DA         |                                           | FORT SEWARD<br>7.6      | 216.6     | 217            |           |
| 150                 | SCP        |                                           | ALDERPOINT<br>1.1       | 209.0     | 209            |           |
| 1600                | DA         |                                           | 208<br>13.6             | 208.1     |                |           |
| 700                 | DA         |                                           | ISLAND MOUNTAIN<br>10.2 | 194.5     | 195            |           |
| 476                 | DA         |                                           | BELL SPRINGS<br>17.8    | 184.3     | 184            |           |
| 763                 | DAP        |                                           | DOS RIOS<br>14.0        | 166.5     | 167            |           |
| 1674                | DA         |                                           | LONGVALE YL<br>10.0     | 152.5     | 153            | 8         |
|                     |            |                                           | MP 142.5<br>3.0         | 142.5     |                | DTC       |
| Yard                | PF         |                                           | WILLITS YL              | 139.5     | 140            | 8         |
|                     |            |                                           | (144.6)                 |           |                |           |

### RULE 480, Direct Traffic Control (DTC) in effect. MAXIMUM AUTHORIZED SPEED

Willits and Korbel..... 25

|                           |                           |
|---------------------------|---------------------------|
| MP 183.0 to 184.0..... 10 | MP 190.0 to 204.0..... 10 |
| MP 227.0 to 227.1..... 10 | MP 228.9 to 229.1..... 10 |
| MP 256.3 to 258.5..... 10 | MP 279.4 to 280.2..... 10 |
| MP 282.0 to 295.6..... 10 | MP 295.6 to 301.8..... 10 |

SPEED ON OTHER THAN MAIN TRACK..... 10

### ADDITIONAL STATIONS EUREKA LINE

| MILE POST | NAME          | DIRECTION OF ENTRY |
|-----------|---------------|--------------------|
| 271.0     | Loleta        | N                  |
| 268.7     | Fernbridge    | D 1800A            |
| 257.0     | Nanning Creek | S 150C             |
| 245.6     | Shively       | N 400C             |
| 241.7     | Larabee       | N 100C             |
| 232.2     | McCann        | S 400C             |
| 205.5     | Cain Rock     | N 200C             |
| 200.3     | Kekawaka      | N 380C             |
| 195.7     | Quarry Spur   | N 200C             |
| 190.24    | 190 1/4 Spur  | S 400C             |
| 180.0     | Spryrock      | S 200C             |
| 171.1     | Woodman       | S 150C             |
| 158.1     | Farley        | D 1360A            |

## SAMOA BRANCH

| Capacity of sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |           | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|-----------|-----------|----------------|-----------|
|                     |            | STATIONS                                  |           |           |                |           |
| Yard                |            | END OF TRACK<br>1.0                       |           | 302.9     |                | ABR       |
| Yard                |            | FAIRHAVEN (LP)<br>1.4                     |           | 301.9     | 2302           |           |
|                     |            | SAMOA<br>8.0                              |           | 300.5     | 2301           |           |
|                     | Y          | R                                         | ARCATA YL | 292.5     | 293            |           |
|                     |            | (10.4)                                    |           |           |                |           |

### Absolute Block Register Territory Arcata to End of Branch MAXIMUM AUTHORIZED SPEED

|                                        |
|----------------------------------------|
| Willits and Korbel..... 20             |
| MP 295.5 to 302.9..... 10              |
| SPEED ON OTHER THAN MAIN TRACK..... 10 |

## ALTON BRANCH

| Capacity of sidings | Facilities | TIME TABLE<br>No. 1<br>September 16, 1993 |  | Mile Post | Station Number | Authority |
|---------------------|------------|-------------------------------------------|--|-----------|----------------|-----------|
|                     |            | STATIONS                                  |  |           |                |           |
| Yard                |            | CARLOTTA<br>5.0                           |  | 267.7     | 1268           | ABR       |
| Yard                |            | ALTON<br>(5.0)                            |  | 262.7     | 263            |           |

### Absolute Block Register Territory Arcata to End of Branch MAXIMUM AUTHORIZED SPEED

|                                          |
|------------------------------------------|
| Alton and end of Carlotta Branch..... 20 |
| MP 267.0 to 267.7..... 10                |
| SPEED ON OTHER THAN MAIN TRACK..... 10   |

### SPECIAL RULES and INSTRUCTIONS NORTH COAST RR

#### RULE 93. LOCATION OF YARD LIMITS:

| South Milepost | Location | North Milepost |
|----------------|----------|----------------|
| 282.0          | Eureka   | 285.2          |
| 151.0          | Longvale | 154.0          |
| 137.9 NWP      | Willits  | 142.5          |

#### RULE 226. ABSOLUTE BLOCK REGISTER TERRITORY:

| South Milepost     | Block            | North Milepost         | Register Location       |
|--------------------|------------------|------------------------|-------------------------|
| Eureka MP MP 285.2 | EUREKA to KORBEL | Mainline MP 301.8      | Depot Eureka            |
| Arcata Y MP 292.8  | SAMOA BRANCH     | End of Branch MP 301.9 | Depot Eureka            |
| Alton MP 262.7     | CARLOTTA BRANCH  | End of Branch MP 267.7 | Alton Box with Register |

#### RULE 480. DIRECT TRAFFIC CONTROL DESIGNATED LIMITS:

| South Milepost | Block Name      | North Milepost |
|----------------|-----------------|----------------|
| 264.0          | Eureka          | 282.0          |
| 255.9          | Fortuna         | 264.0          |
| 253.2          | Scotia          | 255.9          |
| 237.6          | Glynn           | 253.2          |
| 216.9          | South Fork      | 237.6          |
| 208.1          | Fort Seward     | 216.9          |
| 194.5          | 208             | 208.1          |
| 184.4          | Island Mountain | 194.5          |
| 166.7          | Bell Springs    | 184.4          |
| 154.0          | Dos Rios        | 166.7          |
| 142.5          | Willits         | 151.0          |

### LOAD LIMITS

|                  |                |
|------------------|----------------|
| Willits - Eureka | 251,000 pounds |
| Eureka - Korbel  | 240,000 pounds |
| Arcata - Samoa   | 240,000 pounds |
| Alton - Carlotta | 240,000 pounds |



**MAXIMUM AUTHORIZED SPEED:**

BETWEEN SCHELLVILLE AND WILLITS. 30

**EXCEPTIONS:**

|                                       |    |
|---------------------------------------|----|
| 40.4 and 29.0 (SCHELLVILLE BLOCK).... | 25 |
| 28.5 and 25.8 (SCHELLVILLE BLOCK) ... | 25 |
| 31.7 (Southward turnout).....         | 10 |
| 31.7 (Northward Spring switch)....    | 25 |
| 36.9 and 37.2.....                    | 20 |
| 37.2 and 37.3.....                    | 10 |
| 37.3 and 39.3.....                    | 20 |
| 44.1 and 46.7.....                    | 25 |
| 53.0 and 54.5.....                    | 25 |
| 67.5 and 67.7.....                    | 10 |
| 67.7 and 68.6.....                    | 25 |
| 88.5 and 93.4.....                    | 25 |
| 93.4 and 93.5.....                    | 10 |
| 93.5 and 122.2.....                   | 25 |
| 122.2 and 127.3.....                  | 20 |
| 127.3 and 127.9.....                  | 10 |
| 127.9 and 139.5.....                  | 20 |

SPEED ON OTHER THAN MAIN TRACK. 10

**EXCEPTIONS:**

|                                    |   |
|------------------------------------|---|
| BURDELL SIDING: OVER SCALE.....    | 3 |
| SANTA ROSA: ALL YARD TRACKS.....   | 5 |
| PETALUMA: TRACK 300 (P&SR MAIN)... | 5 |
| PETALUMA: ALL YARD TRACKS.....     | 5 |

**MAXIMUM AUTHORIZED SPEED:**

BETWEEN WILLITS AND ARCATA..... 25

**EXCEPTIONS:**

|                      |    |
|----------------------|----|
| 183.0 and 208.0..... | 10 |
| 228.9 and 229.1..... | 10 |
| 256.3 and 258.5..... | 10 |
| 279.4 and 280.2..... | 10 |

**SPEED TABLE:**

| <u>TIME PER MILE</u> | <u>MILES PER HOUR</u> |
|----------------------|-----------------------|
| 2 MIN. 0 SEC.....    | 30.0                  |
| 2 MIN. 5 SEC.....    | 28.8                  |
| 2 MIN. 10 SEC.....   | 27.7                  |
| 2 MIN. 15 SEC.....   | 26.7                  |
| 2 MIN. 24 SEC.....   | 25.0                  |
| 2 MIN. 30 SEC.....   | 24.0                  |
| 2 MIN. 45 SEC.....   | 21.8                  |
| 3 MIN. 0 SEC.....    | 20.0                  |
| 3 MIN. 30 SEC.....   | 17.1                  |
| 4 MIN. 0 SEC.....    | 15.0                  |
| 5 MIN. 0 SEC.....    | 12.0                  |
| 6 MIN. 0 SEC.....    | 10.0                  |
| 7 MIN. 0 SEC.....    | 8.6                   |
| 8 MIN. 0 SEC.....    | 7.5                   |
| 9 MIN. 0 SEC.....    | 6.7                   |
| 10 MIN. 0 SEC.....   | 6.0                   |
| 11 MIN. 0 SEC.....   | 5.5                   |
| 12 MIN. 0 SEC.....   | 5.0                   |
| 13 MIN. 0 SEC.....   | 4.6                   |
| 14 MIN. 0 SEC.....   | 4.3                   |
| 15 MIN. 0 SEC.....   | 4.0                   |
| 16 MIN. 0 SEC.....   | 3.8                   |
| 17 MIN. 0 SEC.....   | 3.5                   |

# NORTHWESTERN PACIFIC RAILROAD

**TIME TABLE NO.****1****IN EFFECT AT**

**12:01 A.M. Pacific Time**  
**Monday, July 22, 1996**

This Time Table is for the exclusive use  
and guidance of Employees

**E. M. McLaughlin**  
Chief Executive Officer

**C. L. Ferguson**  
Trainmaster - Eureka

**R. D. Mitchell**  
Trainmaster - Willits

**B. J. Collins**  
Roadmaster - Willits

**D. G. Gattis**  
System Mechanical Officer - Willits

**L. M. Trout**  
Agent - Eureka

**J. V. Ryan**  
Chief Dispatcher - Eureka



| NORTHWARD           | MP LOCATION | STATION        | STATION NUMBER | MILES FROM SCHELLVILLE | SOUTHWARD |
|---------------------|-------------|----------------|----------------|------------------------|-----------|
|                     |             |                |                |                        |           |
|                     | 40.4        | SCHELLVILLE    | 10305          | 0.0                    |           |
|                     | 28.8        | BLACK POINT    | 10340          | 11.6                   |           |
|                     | 25.8        | IGNACIO        | 10345          | 14.8                   |           |
|                     | 31.3        | BURDELL        | 10385          | 20.3                   |           |
|                     | 38.5        | PETALUMA       | 10400          | 27.5                   |           |
|                     | 53.8        | SANTA ROSA     | 10440          | 42.8                   |           |
|                     | 68.0        | HEALDSBURG     | 10495          | 57.0                   |           |
|                     | 75.8        | GEYSERVILLE    | 10510          | 64.8                   |           |
|                     | 85.2        | CLOVERDALE     | 10525          | 74.2                   |           |
|                     | 100.1       | HOPLAND        | 10539          | 89.1                   |           |
|                     | 114.0       | UKIAH          | 10595          | 103.0                  |           |
|                     | 122.1       | REDWOOD VALLEY | 10620          | 111.1                  |           |
|                     | 139.5       | WILLITS        | 10700          | 128.5                  |           |
|                     | 152.5       | LONGVALE       | 10706          | 141.5                  |           |
|                     | 166.5       | DOS RIOS       | 10710          | 155.5                  |           |
|                     | 175.5       | NASHMEAD       | 10716          | 164.5                  |           |
|                     | 184.4       | BELL SPRINGS   | 10720          | 173.4                  |           |
|                     | 194.5       | ISLAND MTN     | 10722          | 183.5                  |           |
|                     | 208.1       | 208            | 10725          | 197.1                  |           |
|                     | 209.1       | ALDERPOINT     | 10726          | 198.1                  |           |
|                     | 216.6       | FORT SEWARD    | 10728          | 205.6                  |           |
|                     | 225.1       | EEL ROCK       | 10732          | 214.1                  |           |
|                     | 237.3       | SOUTH FORK     | 10736          | 226.3                  |           |
|                     | 253.8       | GLYNN          | 10742          | 242.8                  |           |
|                     | 255.6       | SCOTIA         | 10744          | 244.8                  |           |
|                     | 262.5       | ALTON          | 10750          | 251.5                  |           |
|                     | 264.5       | ROHNERVILLE    | 10752          | 253.5                  |           |
|                     | 266.1       | FORTUNA        | 10754          | 255.1                  |           |
|                     | 277.8       | SOUTH BAY      | 10762          | 266.8                  |           |
|                     | 284.1       | EUREKA         | 10764          | 273.1                  |           |
|                     | 292.5       | ARCATA         | 10770          | 281.5                  |           |
|                     | 295.2       | KORBLEX        | 10772          | 284.2                  |           |
|                     | 300.8       | BLUE LAKE      |                | 289.8                  |           |
|                     | 301.8       | KORBEL         |                | 290.8                  |           |
| ADDITIONAL STATIONS |             |                |                |                        |           |
|                     | 27.8        | NOVATO         | 10380          | 17.0                   |           |
|                     | 38.2        | PARK SIDING    | 10416          | 28.4                   |           |
|                     | 46.1        | COTATI         | 10423          | 36.3                   |           |
|                     | 48.7        | WILFRED        | 10427          | 37.9                   |           |
|                     | 50.7        | TOOD           | 10432          | 39.9                   |           |
|                     | 56.6        | FULTON         | 10470          | 47.7                   |           |
|                     | 62.9        | WINDSOR        | 10480          | 52.1                   |           |
|                     | 66.4        | GRANT          | 10496          | 55.6                   |           |
|                     | 71.9        | LYTTON         | 10606          | 61.1                   |           |
|                     | 81.3        | ASTI           | 10620          | 70.6                   |           |
|                     | 115.9       | PRESSWOOD      | 10806          | 105.0                  |           |
|                     | 120.0       | CALPELLA       | 10815          | 109.2                  |           |
|                     | 124.0       | LAUGHLIN       | 10825          | 113.2                  |           |
|                     | 131.4       | RIDGE          | 10830          | 120.6                  |           |
|                     | 156.1       | FARLEY         | 10708          | 147.3                  |           |
|                     | 171.1       | WOODMAN        | 10714          | 160.3                  |           |
|                     | 180.0       | SPYROCK        | 10718          | 169.2                  |           |
|                     | 190.25      | 190 TA         | 10721          | 179.6                  |           |
|                     | 195.7       | 196 SPUR       | 10723          | 184.9                  |           |
|                     | 200.3       | KEKAWAKA       | 10724          | 189.6                  |           |
|                     | 205.6       | CAIN ROCK      |                | 194.7                  |           |
|                     | 232.2       | MCCANN         | 10734          | 221.4                  |           |
|                     | 241.7       | LARABEE        | 10735          | 230.8                  |           |
|                     | 246.8       | SHIVELY        | 10740          | 234.8                  |           |
|                     | 257.0       | NANNING CREEK  | 10746          | 248.2                  |           |
|                     | 268.7       | FERNBRIDGE     | 10756          | 257.8                  |           |

## SPECIAL RULES OF NWP RAILROAD

### RULE 1.20-IMPAIRED SIDE CLEARANCE

| MILEPOST | LOCATION    | DESCRIPTION |
|----------|-------------|-------------|
| 28.5     | BLACK POINT | DRAWBRIDGE  |
| 37.2     | PETALUMA    | DRAWBRIDGE  |
| 37.8     | WINGO       | BRIDGE      |
| 67.5     | HEALDSBURG  | BRIDGE      |

### RULE 6.13-YARD LIMITS-DESIGNATED LIMITS

| SOUTH MP   | YARD NAME       | NORTH MP   |
|------------|-----------------|------------|
| 44.9       | SCHELLVILLE     | 40.4       |
| 26.0 SOUTH | IGNACIO         | 26.0 NORTH |
| 37.1       | PETALUMA        | 39.6       |
| 112.7      | UKIAH           | 114.3      |
| 137.4      | WILLITS         | 142.5      |
| 151.0      | LONGVALE        | 154.0      |
| 194.0      | ISLAND MOUNTAIN | 195.8      |
| 252.5      | SCOTIA          | 256.5      |
| 282.0      | EUREKA          | 285.2      |

### RULE 6.16-BLOCK REGISTER TERRITORY-DESIGNATED LIMITS

| SOUTH MP | BLOCK NAME      | NORTH MP |
|----------|-----------------|----------|
| 262.7    | CARLOTTA BRANCH | 287.7    |
| 285.2    | KORBLEX BRANCH  | 295.2    |
| 292.8    | SAMOA BRANCH    | 300.5    |

### RULE 6.29.1-TRACKSIDE DETECTORS

| MILEPOST | DESCRIPTION              |
|----------|--------------------------|
| 28.0     | DRAWING EQUIPMENT TALKER |
| 48.9     | HOT BOX TALKER           |
| 72.0     | DRAWING EQUIPMENT TALKER |

### RULE 7.6-SECURING CARS OR ENGINES

SCHELLVILLE AND ARCATA:

NOT LESS THAN THREE HAND BRAKES MUST BE APPLIED ON CARS. TRAIN CREWS MUST NOT RELEASE HAND BRAKES UNTIL ENGINE IS COUPLED AND BRAKE PIPE IS CHARGED.

### RULE 16.0-DIRECT TRAFFIC CONTROL-DESIGNATED LIMITS

| SOUTH MP   | BLOCK NAME      | NORTH MP   |
|------------|-----------------|------------|
| 40.4       | SCHELLVILLE     | 26.0 SOUTH |
| 26.0 NORTH | BURDELL         | 37.1       |
| 39.6       | COTATI          | 54.2       |
| 54.2       | SANTA ROSA      | 75.9       |
| 75.9       | HEALDSBURG      | 84.3       |
| 84.3       | CLOVERDALE      | 100.0      |
| 100.0      | HOPLAND         | 112.7      |
| 114.3      | REDWOOD VALLEY  | 137.4      |
| 142.5      | WILLITS         | 151.0      |
| 154.0      | DOS RIOS        | 166.7      |
| 166.7      | BELL SPRINGS    | 184.4      |
| 184.4      | ISLAND MOUNTAIN | 194.0      |
| 195.8      | 208             | 208.1      |
| 208.1      | FORT SEWARD     | 216.9      |
| 216.9      | SOUTH FORK      | 237.6      |
| 237.6      | GLYNN           | 252.5      |
| 256.5      | FORTUNA         | 264.0      |
| 264.0      | EUREKA          | 282.0      |



## SPECIAL RULES OF NWP RAILROAD

### RULE 8.9-SPRING SWITCHES

| STATION     | LOCATION | NORMAL POSITION | FACING DIRECTION |
|-------------|----------|-----------------|------------------|
| GEYSERVILLE | MP 77.1  | MAIN TRACK      | SOUTH            |
| BURDELL     | MP 31.7  | SIDING          | NORTH            |
| BURDELL     | MP 30.5  | MAIN TRACK      | NORTH            |

### GRADE RESTRICTIONS

ON DESCENDING GRADE BETWEEN REDWOOD VALLEY AND WILLITS, TRAINS MUST NOT EXCEED 200 TONS PER AXLE OF OPERATIVE DYNAMIC BRAKE. TRAINS EXCEEDING 80 TPOB MUST NOT EXCEED 15 MPH. WHEN TRAIN HAS INSUFFICIENT DYNAMIC BRAKE, 1 RETAINING VALVE FOR EACH 150 TONS MUST BE SET. WHEN A TRAIN HAS NO DYNAMIC BRAKE, ALL RETAINING VALVES MUST BE SET AND TRAIN MUST NOT EXCEED 10 MPH. WHEN IT IS KNOWN THAT RETAINING VALVES WILL BE REQUIRED AT RIDGE, AFTER COMPLETION OF REQUIRED AIR TEST, RETAINING VALVES MAY BE SET AT WILLITS OR REDWOOD VALLEY.

### MISCELLANEOUS

1. SP 354000-354199 SERIES WOOD CHIP CARS EXCEED CLEARANCES NORTH OF MP 90.0 AND MUST NOT BE MOVED BEYOND THIS POINT. TRAINS HANDLING LOADED CARS IN ABOVE SERIES MUST REDUCE SPEED OF TRAIN NOT EXCEEDING 10 MPH OVER HEALDSBURG BRIDGE, MP 67.0. ON ALL MOVEMENTS, CARS MUST BE SEPARATED AT LEAST FIVE CARS FROM ENGINE OR CABOOSE, TRAIN LENGTH PERMITTING.
2. CARS BEARING "EXCEED PLATE C" SYMBOL OR WORDS EXCESS HEIGHT MUST NOT BE OPERATED NORTH OF CLOVERDALE.
3. PETALUMA. ONLY ONE 4-AXLE UNIT MAY OPERATE ON TRACK 300 (OLD P&SR MAIN TRACK).
4. PETALUMA. DO NOT OPERATE BEYOND WASHINGTON STREET ON TRACK 310 (OLD P&SR MAIN TRACK). TRACK OUT OF SERVICE.
5. UKIAH. TRACK 624-MASONITE MUST NOT BE SWITCHED WITH MORE THAN ONE UNIT.
6. REDWOOD VALLEY. INPAIRED CLEARANCE MAY EXIST ADJACENT TO TRACK 0643 ACCOUNT DISMANTLING OF RAILROAD CARS.
7. SIX AXLE UNITS WILL NOT OPERATE ON TRACK 441 (GP SANTA ROSA).
8. HAZARDOUS MATERIALS MAY NOT BE TRANSPORTED NORTH OF MP 142.5.
9. THE TRACK BETWEEN KORBEX-MP 295.2 AND KORBEL-MP 301.8 IS OUT-OF-SERVICE.
10. DO NOT PUT DRGW 14000 & 17000 BALLAST CARS AGAINST CENTERBEAMS OR 90+ FOOT CONTAINER CARS NORTH OF MP 142.5.
11. ALL DIRECTIONS PREVIOUSLY REFERRED TO AS "EAST" WILL NOW BE REFERRED TO AS "NORTH." ALL DIRECTIONS PREVIOUSLY REFERRED TO AS "WEST" WILL NOW BE REFERRED TO AS "SOUTH."

# SAFETY FIRST !

## ADDITIONS AND REVISIONS TO THE GENERAL CODE OF OPERATING RULES

### RULE 1.1-SAFETY RULES

NWP HAS ADOPTED THE CURRENT EDITION OF SOUTHERN PACIFIC LINES' SAFETY AND GENERAL RULES FOR ALL EMPLOYEES.

### DEFINITION: TRAIN REGISTER

A BOOK OR FORM USED AT DESIGNATED STATIONS FOR REGISTERING TIME OF ARRIVAL AND/OR DEPARTURE OF TRAINS AND SUCH OTHER INFORMATION AS MAY BE PRESCRIBED.

### RULE 1.3.1-RULES, REGULATIONS AND INSTRUCTIONS

IS REVISED TO READ:

OPERATION OF NWP WILL BE GOVERNED BY THE CURRENT EDITION OF THE GENERAL CODE OF OPERATING RULES.

### RULE 3.3-TIME COMPARISON

STANDARD CLOCK LOCATED IN THE EUREKA DEPOT OR CORRECT TIME MAY BE OBTAINED BY CALLING (707)444-8055.

### RULE 4.1-NEW TIMETABLE

THE MOMENT A NEW TIMETABLE GOES INTO EFFECT, IT WILL REPLACE THE PREVIOUS ONE AND ALL GENERAL ORDERS ISSUED PRIOR TO THE EFFECTIVE DATE OF THE NEW TIMETABLE.

### RULE 5.4.1-TEMPORARY RESTRICTIONS

YELLOW FLAGS WILL BE DISPLAYED ONE HALF MILE IN ADVANCE OF RESTRICTION WHEN PRACTICABLE.

### RULE 5.5-PERMANENT SPEED SIGNS

REDUCE SPEED SIGN; ONE HALF MILE IN ADVANCE OF RESTRICTION. INCREASE SPEED SIGNS; TRAIN MAY INCREASE SPEED WHEN REAR OF TRAIN CLEARS RESTRICTION.

### RULE 6.12-FRA EXCEPTED TRACK:

ON TRACK(S) DESIGNATED AS "FRA EXCEPTED TRACK," THE FOLLOWING WILL GOVERN:

1. MAXIMUM SPEED WILL NOT EXCEED 10 MPH.
2. NO PASSENGER TRAIN SHALL BE OPERATED.
3. NO TRAIN WILL BE OPERATED THAT CONTAINS MORE THAN FIVE CARS PLACARDED ACCORDING TO HAZARDOUS MATERIAL REGULATIONS.

### RULE 6.19-FLAGGING RULE

SPECIFIED FLAGGING DISTANCE IS ONE HALF MILE.

### RULE 6.32.6-BLOCKING PUBLIC CROSSINGS

IS REVISED TO READ:

A PUBLIC CROSSING WHICH IS BLOCKED BY A STOPPED TRAIN MUST BE OPENED WITHIN TEN MINUTES UNLESS NO VEHICLE OR PEDESTRIAN IS WAITING AT THE CROSSING.

### RULE 80.0-TRAIN HANDLING

NWP HAS ADOPTED THE CURRENT EDITION OF SOUTHERN PACIFIC LINES' RULES AND INSTRUCTIONS GOVERNING AIR BRAKE SYSTEM AND TRAIN HANDLING.

## GETTING HURT IS A FOOLISH WAY TO PROVE THAT RULES MEAN WHAT THEY SAY



Exhibit B5 – “A&MR Key to New NWP Success” (8/1995)



THE

## HEADLIGHT

NORTHWESTERN PACIFIC RAILROAD HISTORICAL SOCIETY

VOL. XI NO. 4

Preserving the heritage of Redwood Empire railroading

AUGUST, 1995

## A&amp;MR Key to New NWP Success

## Headlight Staff Report

**SACRAMENTO**—Rebuilding and operating the picturesque but derelict Arcata & Mad River Railroad in Humboldt County is one key to putting the old Northwestern Pacific Railroad fully into public hands and ensuring its future success, a panel of the California Transportation Commission was told here July 12.

Leading to these goals, CTC is being asked to approve a keystone feature of an intricate financial plan under which the new NWP Joint Powers Authority hopes to buy 140 miles of mostly ex-NWP trackage from Southern Pacific for \$27 million, using chiefly federal and state funds. That plan includes a \$12 million, 20-year interest-free loan from the Federal Highway Administration—in bureaucrat talk, the "Q Fund."

North Coast Railroad Authority's presentation encountered a sometimes skeptical but generally encouraging response from members of CTC's Railway Committee. No action was taken.

To get the Q Fund money, a way must be found to repay it. The method for repayment is what CTC is being asked to endorse, probably at its August meeting in Irvine. That method is for the NCRA—which operates the North Coast Railroad from Willits to the Eureka area—to put its lion's share of revenue from the California Northern Railroad's lease of NWP into a trust fund, which along with trackside leasehold revenues hopefully will build to \$12 million by the repayment year of 2015.

If this arrangement passes muster with CTC, it will "cause the release of about \$10 million of additional federal...and state funds for use in rehabilitating portions of NCRA's existing system located north of Eureka as well as returning the Arcata & Mad River Railroad to service...." Allan Hemphill, first vice chairman of NCRA, informed the CTC Railway Committee here, continuing:



The ANNIE & MARY  
Oldest Railroad In The West

"Return of the A&MR to service is expected to provide both cost reductions and increased traffic volume and revenue to the NCRA," an estimated net of nearly \$600,000 a year.

Hemphill appeared here with Gary Milliman, Fort Bragg city administrator and chairman of NCRA, and a delegation—which sat silently by—from the Golden Gate Bridge District. The bridge, Marin County and NCRA have joined to form the NWP Joint Powers Authority. They hope to complete the purchase from SP by year's end.

Reconstruction of A&MR would take about two years and add an estimated annual 1,000 carloads of lumber for NCRR from Simpson Timber and Blue Lake Forest Products mills, which now truck lumber to load a far smaller number of cars at NCRR railheads at Korbex or Arcata. NCRR now credits the mills with about \$100,000 a year in reload allowances for the truck-to-rail transfers.

A&MR, nicknamed the "Annie & Mary," dates from 1855 as a horse-drawn railroad to the Arcata wharf. It developed into an odd-width narrow gauge line to the mill at Korbex, plus timber-gathering spurs. Dual gauged after 1925, it survived as a standard-gauge line of about 7 miles until 1985. Its trackage was purchased by the Eureka Southern Railroad, NCRR's immediate predecessor.

The issue here, in Hemphill's word, is a "critical" piece of the jigsaw puzzle in putting NWP back together. Financial viability of the southern end of the line, the part

south of Willits being bought from SP, depends on the flow of lumber-laden cars from the north. And now the north must depend, for repayment of the federal loan, on revenue from the south.

Future passenger operations there, including commuter service in Marin and Sonoma counties, must depend upon other arrangements to be made in the future. NCRR, however, hopes to restore passenger excursion operations through the scenic Eel River canyon.

NCRA said that, at current operating levels—which are expected to rise—its share of revenues from the California Northern lease of NWP is at least \$210,000 annually, and its share of revenues from about 500 leases of businesses on railroad-owned trackside property is another \$125,000—a total of \$335,000. This money (15 per cent of Cal Northern's gross on the line) now goes to SP; but will flow to the new Joint Powers Authority after the purchase.

U.S. Rep. Frank D. Riggs (R-Windsor), in a letter to CTC, urged approval of the NCRA fund proposal. He noted that the acquisition of NWP has had the support of three successive congressmen from the First District, two of them his political adversaries.

"Further, I understand that the use of these ["Q"] funds in the proposed fashion will make available a like amount of federal grant funds for use in securing station sites along the southern portion of the line, and for continued rehabilitation of railroad facilities north of Willits," Riggs wrote.

Additional political support for the NCRA proposal was voiced at the meeting here by State Sen. Mike Thompson (D-St. Helena) and by Assemblyman Dan Hauser (D-Arcata), sponsor of the legislation that created NCRA and rescued the north end of the railroad from abandonment.

Robert Shelton of Corona del Mar (Orange County), the Railway Committee chairman, calling the NCRA proposal "com

*Continued Page 3*

## Funding for Rehabilitation of Arcata & Mad River Railroad 1996.

# Deal final in purchase of rail line

**Escrow closed at 12:01 a.m. today**

By K.C. MEADOWS  
The Daily Journal

The ink is finally dry on the purchase of 140 miles of Southern Pacific Railroad by a public group made up of the North Coast Railroad Authority, the Golden Gate Bridge District and Marin County.

Escrow on the purchase closed at 12:01 a.m. today.

The purchase was, for all intents and purposes, finalized in February when it got official approval from the California Transportation Commission.

The CTC in February released \$42 million in state and federal funds, \$28 million of which will go to Southern Pacific for rails from Willits to Larkspur.

The North Coast Railroad Authority has agreed to guarantee a \$12-million loan as part of the deal to purchase 75.4 miles of track from Willits to Healdsburg.

The North Coast Railroad Authority will get an additional \$9 million out of the pot for a variety of projects, including reopening the Arcata-to-Mad River rail line to serve shippers in that area, and restoring and purchasing passenger cars.

The railroad purchase has been in the works for years, blocked in large part by a recalcitrant Marin County, which doubted the North Coast Railroad's financial stability.

But when fears of losing the federal money set aside for the purchase began to spread in early 1995, negotiations went back into high gear.

In March 1995, an agreement was reached between the North Coast Railroad Authority (which represents Mendocino, Sonoma and Humboldt counties), Marin County and the Golden Gate Bridge District to purchase the line.

Under the agreement, the line from Willits to Healdsburg would become part of the North Coast railroad. The additional 41 miles of track from Healdsburg to Novato and the 23-mile spur from Novato to Larkspur would be owned by the collective authority of the three agencies. The North Coast Railroad Authority already owns the line from Arcata to Willits.

Passenger excursions and boosting tourism along the North Coast are a priority for the North Coast Railroad Authority, which had hoped to start excursions this summer.

Track repairs and passenger car improvements will likely push that date into 1997. The railroad has had proposals from private excursion companies, including dinner excursions from Healdsburg to Willits and day excursions linking up with the Skunk Train in Willits and passenger ships from San Francisco in Eureka.

Clipped from  
[Ukiah Daily Journal](#)  
[Ukiah, California](#)  
30 Apr 1996, Tue • Page 1

Show article text (OCR) ▾



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**Exhibit B6 – “Railroad Starts Work on Tracks”**

# Railroad starts work on tracks

By David Anderson  
The Times-Standard

BLUE LAKE — Work has started on replacing the tracks of the former Arcata and Mad River Railroad.

Dan Hauser, director of the Northwestern Pacific Railroad, said the old rails are being salvaged and will be sold for scrap. They will eventually be replaced by heavier rails capable of bearing the weight of modern locomotives.

Hauser said it will probably be 18 to 24 months before the rails are replaced. Three trestles and a bridge will also have to be re-

placed, and some curves in the 7-mile line flattened.

"This was essentially an old logging railroad, built for 40-foot wooden boxcars," he said. "Modern cars are at least 60 feet long."

Most of the line, locally known as the "Annie and Mary," was laid in the 1870s. Some sections, built in the 1850s, were the first rails west of the Mississippi River.

The line originally started at the end of a pier reaching out into Arcata Bay. The depot was where the Arcata post office is now.

The Arcata and Mad River Railroad runs from Korbel through

■ See ANNIE/Back of section



## ANNIE: Federal grant funds project

FROM A1

Blue Lake and Glendale, joining the main line of the Northwestern Pacific Railroad in Arcata. It carried lumber until 1994, when the Federal Railroad Authority closed it because of the condition of the tracks and trestles.

The line, formerly owned by Simpson Timber Co., was sold to Eureka Southern Railroad, which went bankrupt in 1989. The

Eureka Southern holdings were acquired by the Northcoast Railroad Authority, a public agency, in 1992.

The authority runs the Northwestern Pacific, which links Humboldt County to the San Francisco Bay Area.



**4TH BIG WEEK!!**  
**TIP TOP TOPLESS**  
**RV SALES**

Exhibit B7 – “Rail Replacement Wait May be Long” (4/40/1996)

12-7-1997  
**Rail replacement  
wait may be long**

**BLUE LAKE** — Removal of the old rails on the Arcata and Mad River Railroad should be completed by the end of the month, North Coast Rail Authority officials say.

But it may be almost two years before the rail authority can afford to install the heavier rails it needs to reopen the line. Three trestles and a bridge must also be replaced.

General Manager Dan Hauser said the railroad authority received a \$4.5 million federal grant to upgrade the Arcata and Mad River. But last year approval was received to use the funds to repair storm damage on the main line.

"It was done with the concurrence of federal government and the two shippers on the line — Simpson and Blue Lake Forest Products," he said. "They agreed it was no use gold-plating a spur line if we couldn't keep the main line open."

The railroad suffered heavy damage in the winter storms of 1975 and 1976, especially in the Eel River Canyon. Most of the promised federal disaster funds have not yet been received, leaving the line heavily indebted for already completed repair work.



## Exhibit C – Correspondence with CalSHPO to date

**Re: California historic resources search, Humboldt and Mendocino counties**

From: C. Montange (c.montange@frontier.com)

To: nwic@sonoma.edu

Bcc: ncra.mstogner@sbcglobal.net; elizabeth.coleman@sonoma-county.org

Date: Thursday, September 17, 2020, 11:20 AM PDT

To: Bryan Much, Coordinator, NIC for Cal SHPO

Following your instructions to keep it simple, I ran two searches on the data base at [Built Environment Resource Directory \(BERD\)](#) ( "northwest" and "railroad" ) in each of the three counties (Humboldt, Trinity, and Mendocino) traversed by the project.

**Built Environment Resource Directory (BERD)**

California State Parks, State of California

Here are the results by OTIS identification number, with a couple caveats.

**Mendocino County**

565154  
407558  
140265

and the following seven (7) items which came up for "railroad" and may be just location signals with nothing to do with the actual project:

557871 to 875,  
557879  
557880

**Trinity County**

452820

**Humboldt County**

664582  
531821

475661  
470393  
687296

and the following that came up for "railroad" (same uncertainties as for Mendocino)

487561-565 (five items)  
407986  
487566  
566076

There were a number of items with "railroad" in column G, and I am guessing that was more address than actual railroad, but here is one to see what this was about (if it actually involves the rail line, then I will have to order some more):

558738

So, what is this going to set me back in terms of copy fees, hopefully for electronic versions, and total cost?

I will talk to Josh Buck about asking you for some reasonable arrangement for the archeological sites, if any. This is for a environmental and historic report to accompany a rail abandonment proceeding at Surface Transportation Board, and is actually intended to assist the Cal SHPO in its comments, if any.

On Monday, September 14, 2020, 4:19:56 PM PDT, Northwest Information Center <[nwic@sonoma.edu](mailto:nwic@sonoma.edu)> wrote:

No thank you, I will call you. You listed your number:

Thanks. Charles H. Montange, Seattle, WA (206-546-1936)

regards,  
Bryan

=====  
Bryan Much, Coordinator  
he, him, his  
Northwest Information Center  
California Historical Resources Information System  
Sonoma State University  
voice-707.588.8455  
office email: [nwic@sonoma.edu](mailto:nwic@sonoma.edu)  
<http://www.sonoma.edu/nwic>  
=====



**From:** C. Montange <c.montange@frontier.com>  
**Sent:** Monday, September 14, 2020 4:03 PM  
**To:** Northwest Information Center <nwic@sonoma.edu>  
**Subject:** Re: California historic resources search, Humboldt and Mendocino counties

The only number listed "below" was 707-588-8455. Do you want me to call that on Thursday at 10?

My tel number is 206-546-1936.

On Monday, September 14, 2020, 3:40:40 PM PDT, Northwest Information Center <nwic@sonoma.edu> wrote:

Thursday at 10:00; I will call the number listed below. Thanks.

regards,  
Bryan

=====

Bryan Much, Coordinator  
he, him, his  
Northwest Information Center  
California Historical Resources Information System  
Sonoma State University  
voice-707.588.8455  
office email: [nwic@sonoma.edu](mailto:nwic@sonoma.edu)  
<http://www.sonoma.edu/nwic>

=====

**From:** C. Montange <c.montange@frontier.com>  
**Sent:** Monday, September 14, 2020 12:56 PM  
**To:** Northwest Information Center <nwic@sonoma.edu>  
**Subject:** Re: California historic resources search, Humboldt and Mendocino counties

Any time Wed afternoon or Thursday. I will accommodate you.

On Monday, September 14, 2020, 11:59:23 AM PDT, Northwest Information Center <nwic@sonoma.edu> wrote:

Sorry, these times were all booked.

Wednesday or Thursday anything open for you?

regards,  
Bryan

=====

Bryan Much, Coordinator

he, him, his

Northwest Information Center

California Historical Resources Information System

Sonoma State University

voice-707.588.8455

office email: [nwic@sonoma.edu](mailto:nwic@sonoma.edu)

<http://www.sonoma.edu/nwic>

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**From:** C. Montange <[c.montange@frontier.com](mailto:c.montange@frontier.com)>

**Sent:** Friday, September 11, 2020 12:17 PM

**To:** Northwest Information Center <[nwic@sonoma.edu](mailto:nwic@sonoma.edu)>

**Subject:** Re: California historic resources search, Humboldt and Mendocino counties

I was on the phone with NCRA's Exec. Director. I will try calling you now (did not work). Otherwise how about Monday at 9 AM, 10 AM, or 11 AM, or Tuesday 9 AM?

On Friday, September 11, 2020, 12:06:05 PM PDT, Northwest Information Center <[nwic@sonoma.edu](mailto:nwic@sonoma.edu)> wrote:

---

Hello Charles,

I am following up as I tried to call you about an hour ago, today, Sept. 11<sup>th</sup>. I will have time next week if you'd like to schedule something. Please let me know a few general time frames you'd be available and I'll find one that works with my schedule.

regards,

Bryan

=====

Bryan Much, Coordinator

he, him, his

Northwest Information Center

California Historical Resources Information System

Sonoma State University

voice-707.588.8455

office email: [nwic@sonoma.edu](mailto:nwic@sonoma.edu)

<http://www.sonoma.edu/nwic>

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**From:** C. Montange <[c.montange@frontier.com](mailto:c.montange@frontier.com)>

**Sent:** Monday, September 7, 2020 10:47 AM

**To:** [nwic@sonoma.edu](mailto:nwic@sonoma.edu)

**Subject:** California historic resources search, Humboldt and Mendocino counties

I am assisting in preparing a report on the history of the old NWP (now North Coast Railroad Authority) rail line (including predecessors and successors) in (inter alia) Humboldt and Mendocino Counties, from Willits north. Line runs through Willits, down the Eel River Canyon, into Eureka, with branch line termini at (1) Samoa/Fairhaven, (2) Korblex (north of Arcata) and (3) Carlotta (all the termini in Humboldt). NCRA system route map is found on the attached link. [http://www.northcoastrailroad.org/images/nwphs\\_map\\_1996cnew.gif](http://www.northcoastrailroad.org/images/nwphs_map_1996cnew.gif)  
The history is is for NCRA.

I wish to identify any CA (or national or local) historic resources (districts, sites, structures etc.) on or immediately adjacent to the line. Can you assist, and if so, how long will it take and how much will it cost?

Thanks. Charles H. Montange, Seattle, WA (206-546-1936)



## Exhibit D – Letter to agencies, et al



**North Coast Railroad Authority**  
**419 Talmage Road, Suite M**  
**Ukiah, CA 95482**  
**707-463-3280**

March 9, 2021

To: Addressees on Attached List

Re: Proposed abandonment and railbanking of North Coast Railroad Authority's Line from Willits (MP 139.5) to end of line in Samoa, Korblex, Korbel, and Carlota, to be docketed as North Coast Railroad Authority – Abandonment Exemption – in Mendocino, Trinity and Humboldt Counties, CA, Surface Transportation Board docket no. AB 1305

To whom it may concern:

On May 14, 2021 (or sixty days after posting of this Environment Report/Historic Report, whichever is later), we expect to be filing with the Surface Transportation Board an abandonment proceeding pursuant to 49 C.F.R. 1152.50 (two-year out-of-service exempt abandonments) seeking authority to abandon and to railbank (per 16 U.S.C. 1247(d) for interim rail use subject to rail reactivation) a line of railroad located in Mendocino, Trinity and Humboldt Counties, CA, between Willits at Commercial Street (MP 139.5) to Eureka (approximately MP 284.1) including the entirety of the Samoa, Korblex and Carlotta Branches (ending at approximately MP 302.9, 295.6 and 267.7 respectively, and also inclusive of North Coast Railroad Authority's (NCRA's) Arcata and Mad River Subsidiary which extends through Blue Lake (approximately MP 300.8) to Korbel, ending at approximately MP 301.8. Attached is an Environmental Report and Historic Report (ER/HR) describing the proposed action and any expected environmental (and/or historic) effects, as well as a map of the affected area (Exhibit A in the ER/HR).

We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the Board's environmental review process, please contact the Office of Environmental Analysis (OEA), Surface Transportation Board, Washington, DC, telephone 202-

245-0238 and refer to the above Docket No. AB-1305. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to OEA (with a copy to our representative) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Charles H. Montange who may be contacted by telephone at 206-546-1936 or by mail at Law Offices of Charles H. Montange, 426 NW 162<sup>nd</sup> St., Seattle, WA 98177. His email address is [c.montange@frontier.com](mailto:c.montange@frontier.com).

Very truly,

A handwritten signature in dark ink, appearing to read "Mitch Stogner", with a long horizontal flourish extending to the right.

Mitch Stogner,

Manager, NCRA

Att: List of recipients of this notice letter



BEFORE THE SURFACE TRANSPORTATION BOARD

North Coast Railroad Authority – )  
Abandonment Exemption – ) AB 1305X  
in Humboldt, Trinity and Mendocino )  
Counties, CA )

Service List for Combined Environmental Report and Historic Report  
(for distribution circa March 9, 2021)<sup>1</sup>

California State Clearinghouse  
Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044  
[website indicates suspended paper submissions so sent electronically to:  
state.clearinghouse@opr.ca.gov]

California Environmental Protection Agency  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815  
cepacomm@calepa.ca.gov

California Coastal Commission

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<sup>1</sup> Due to covid, many are working remotely and some agencies (like STB) have actually indicated submissions should be made electronically. On this service list, the California Clearinghouse and North Coast Regional Water Quality Control Board websites (like STB's) call for submissions to be made electronically. Accordingly, NCRA is using the email addresses for submission to those entities. In all other cases, NCRA is using USPS addresses. NCRA is also supplying electronic copies or at least notice per the email addresses provided as found on websites or supplied in response to telephone calls. NCRA is unable to provide email versions or notice to those entities for whom no email address is reasonably apparent on their websites, and who have either stated USPS service is adequate or have not responded to inquiry about email service.

North Coast District  
1385 8<sup>th</sup> St. #130  
Arcata, CA 95521  
aurora.robinson@coastal.ca.gov

Julianne Polanco, State Historic Preservation Officer  
California State Parks  
Office of Historic Preservation  
1725—23<sup>rd</sup> St., Suite 100  
Sacramento, CA 95816  
calshpo.ohp@parks.ca.gov

North Coast Regional Water Quality Control Board  
5550 Skylane Blvd Suite A  
Santa Rosa, CA 95403-1071  
[Board prohibits paper filings, so submitted by email attachment to  
NorthCoast@waterboards.ca.gov]

Round Valley Indian Tribes  
Att. Kathleen Willits  
77826 Covelo Road  
Covelo, California 95428  
tribalreceptionist@rvit.org

California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
secretary@resources.ca.gov

Bear River Band of Rohnerville Rancheria  
Att: Josefina Cortez, Chair  
266 Keisner Road  
Loleta, CA 95551  
[no apparent email address as of 5 March]

Humboldt County Board of Supervisors

825 Fifth St.  
Eureka, CA 95501  
cob@co.humboldt.ca.us

Planning Commission,  
Humboldt County  
3015 H Street  
Eureka, CA 95501  
Planningclerk@co.humboldt.ca.us

Blue Lake Rancheria  
Att: Claudia Brundin, Chairperson  
PO Box 428  
Blue Lake, CA 95525  
info@bluelakerancheria-nsn.gov

Trinity County Board of Supervisors  
11 Court St., Room 230  
P.O. Box 1613  
Weaverville, CA 96093  
[no apparent email address as of 5 March]

Trinity County Planning Department  
61 Airport Road  
P.O. Box 2819  
Weaverville, CA 96093  
Info.planning@trinitycounty.org

Wiyot Tribe, Table Bluff Reservation  
Att: Ted Hernandez, Tribal Chair  
1000 Wiyot Drive  
Loleta, CA 95551  
ted@wiyot.us

Mendocino Board of Supervisors  
501 Low Gap Road, Room 1010



Ukiah, CA 95482  
bos@mendocinocounty.org

Mendocino County Planning Commission  
860 N. Bush St.  
Ukiah, CA 95482  
pbs@mendocinocounty.org

Sherwood Valley Rancheria  
Att: Melanie Rafanan, Chairperson  
190 Sherwood Hill Drive  
Willits, CA 95490  
[hardcopy sufficient at this time]

US Environmental Protection Agency  
Region 9 (Pacific Southwest)  
75 Hawthorne St.  
San Francisco, CA 94105  
[no apparent email address as of 5 March]

US Fish and Wildlife Service  
Pacific Southwest Region  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825-1846  
[no apparent email address as of 5 March]

Regional Director, Pacific West Region  
National Park Service  
333 Bush Street, Suite 500  
San Francisco, CA 94104-2828  
[no apparent email address as of 5 March]

US Army Corp of Engineers, San Francisco District  
450 Golden Gate Ave 4th floor  
San Francisco, CA 94102  
cespn—regulatory—info@usace.army.mil

Communications and Outreach Branch, NOAA  
N/NGS12  
National Geodetic Survey, SSMC3 #9340  
1315 East-West Highway  
Silver Spring, MD 20910-3282  
Dana.Caccamise@noaa.gov

Carlos Suarez, State Conservationist  
California State Office, National Soil and Conservation Service  
Richard E. Lyng USDA Service Center  
430 G Street, #4164  
Davis, CA 95616-4164  
racann.dubay@usda.gov

U.S. Department of the Interior  
Bureau of Land Management  
California State Office  
2800 Cottage Way, Suite 1623  
Sacramento, CA 95825  
BLM\_CA\_WEB\_SO@blm.gov

Bureau of Land Management – Arcata Field Office  
1695 Heindon Road  
Arcata, CA 95521-4573  
BLM\_CA\_Web\_AR@blm.gov

U.S. Forest Service  
Region 5 (Pacific Southwest)  
1323 Club Drive  
Vallejo, CA 94592  
Dennis.geiser@usda.gov

Friends of the Eel River  
Att: Scott Greacen  
PO Box 4945  
Arcata, CA 95518  
scott@eelriver.org

Humboldt Trails Council  
PO Box 7164  
Eureka, CA 95502  
info@humtrails.com

Rails to Trails Conservancy  
Att: Laura Cohen  
1736 Franklin Street, Suite 550  
Oakland, CA 94612  
laura@railstotrails.org

Mendocino National Forest  
825 N. Humboldt Ave.  
Willows, CA 95988  
[stated hard copy service is sufficient]

Six Rivers National Forest  
1330 Bayshore Way  
Eureka, CA 95501  
[no apparent email address as of 5 March]

California Department of Transportation  
P.O Box 942873  
Sacramento, CA 94273-0001  
Leishara.ward@dot.ca.gov



Exhibit E -- Comments received to date [supplied at filing of NOE]

**Exhibit F – List of Bridges (believed 50 years old or older)**

## Northwestern Pacific Railroad Bridges

| Photo | Location                                           | Milepost   | Length | Build Year         | Year Documented | Type of Source                                |
|-------|----------------------------------------------------|------------|--------|--------------------|-----------------|-----------------------------------------------|
| 1     | Minor Creek Crossing (Arcata & Mad River Branch)   | 299.6 (A)  | 708'   | Approximately 1933 | 2017            | 708' Trestle                                  |
| 2     | Mad River Crossing (Arcata & Mad River Branch)     | 298.3 (A)  | 505'   | Approximately 1940 | 2019            | 505' Three Riveted Through Span Steel Trusses |
| 3     | Green Tank Crossing (Arcata & Mad River Branch)    | 297.82 (A) | 269'   | Approximately 1933 | 2020            | 269' Trestle                                  |
| 4     | Schoolhouse Crossing (Arcata & Mad River Branch)   | 297.68 (A) | 136'   | Approximately 1933 | 2020            | 136' Trestle                                  |
| 5     | Warren Creek Crossing (Arcata & Mad River Branch)  | 297.6 (A)  | 490'   | Approximately 1933 | 2020            | 450' Trestle                                  |
| 6     | Mad River Slough Crossing (Samoa Branch)           | 296.28 (B) | 450'   | 1970               | 2019            | 450' Concrete Bridge                          |
| 7     | McDaniel Slough Crossing (Samoa Branch)            | 293.76 (B) | 45'    | 1965               | 2019            | 45' Three Span Open Deck                      |
| 8     | Second Jolly Giant Creek Crossing (Korblex Branch) | 292.88 (C) | 15'    | Pre-1945           | 2015            | 15' Single Span Deck Bridge                   |
| 9     | Jolly Giant Creek Crossing (Korblex Branch)        | 291.48 (C) | 45'    | 1945               | 2019            | 45' Three Span Open Deck                      |
| 10    | Jacoby Creek Crossing (Korblex Branch)             | 290.61 ©   | 195'   | 1935               | 2020            | 195' Thirteen Span Open Deck Bridge           |
| 11    | Gannon Slough Crossing (Korblex Branch)            | 290.41 (C) | 55'    | 1923               | 2020            | 55' Four Span Open Deck Bridge                |
| 12    | Eureka Slough Crossing (Korblex Branch)            | 285.65 (C) | 719'   | 1975               | 2018            | 719' Concrete Lift Span Bridge                |
| 13    | Elk River Crossing (North End)                     | 280.41     | 205'   | 1914               | 2019            | One 205' Through Girder Bridge                |
| 14    | Swauger Creek Crossing (North End)                 | 270.68     | 696'   | 1925               | 2019            | 696' Open Deck Bridge                         |
| 15    | Rhoner Creek Crossing (North End)                  | 266.7      | 45'    | Pre-1914           | 2019            | 45' Open Deck Bridge                          |
| 16    | Yager Creek (Carlotta Branch)                      | 267 (D)    | 384'   | 1939               | 2019            | 384' Open Deck Bridge                         |
| 17    | Van Duzen River Crossing (North End)               | 261.78     | 759'   | 1913               | 2020            | 759' Through Pin Trusses Bridge               |
| 18    | Nanning Creek (North End)                          | 257.04     | 615'   | 1940/1955          | 2020            | 615' Open Deck Bridge                         |
| 19    | Stitz Creek (North End)                            | 251.3      | 252'   | 1938               | 2020            | 252' Trestle                                  |
| 20    | Shively Creek - Second Crossing (North End)        | 246.58     | 195'   | 1965               | 2017            | 195' Trestle                                  |
| 21    | Shively Creek - First Crossing (North End)         | 246.18     | 135'   | 1965               | 2019            | 135' Trestle                                  |
| 22    | Larabee Creek Crossing (North End)                 | 241.97     | 306'   | 1910               | 2019            | 306' Through Pin Truss Bridge                 |
| 23    | South Fork Crossing (North End)                    | 237.75     | 794'   | 1910/1965          | 2019            | 794' Through Pin Truss Bridge                 |
| 24    | Dyerville Loop Road Crossing (North End)           | 236.26     | 23     | 1911               | 2019            | 23' Beam Span Bridge                          |
| 25    | Sonoma Creek Crossing (North End)                  | 230.25     | 210'   | 1941               | 2020            | 210' Trestle                                  |
| 26    | Zook's Bluff Crossing (North End)                  | 228.02     | 101'   | 1914               | 2018            | 101' Girder Bridge                            |
| 27    | Brook Creek Crossing (North End)                   | 221.73     | 392'   | 1941               | 2020            | 329' Trestle                                  |
| 28    | Steelhead Crossing (North End)                     | 211.68     | 362'   | 1914               | 2020            | 362' Deck Girder Bridge                       |
| 29    | Cain Rock Crossing (North End)                     | 206.51     | 1117'  | 1913               | 2017            | 1,117' Through Skewed Deck Girder Bridge      |



|    |                                          |        |        |           |      |                                   |
|----|------------------------------------------|--------|--------|-----------|------|-----------------------------------|
| 30 | Kekewaka Creek Crossing (North End)      | 200.1  | 241'   | 1914      | 2020 | 241' Deck Girder Bridge           |
| 31 | Island Mountain Crossing (North End)     | 194.68 | 623'   | 1913/1965 | 2019 | 623' Deck Girder Bridge           |
| 32 | Bell Springs Crossing (North End)        | 185.1  | 182'   | 1913/1965 | 2019 | 182' Girder Bridge                |
| 33 | Blue Rock Creek Crossing (North End)     | 182.9  | 222'   | 1913/1965 | 2019 | 222' Deck Girder Bridge           |
| 34 | Woodman Creek Crossing (North End)       | 171.49 | 171.49 | 1913/1965 | 2019 | 51' Deck Girder Bridge            |
| 35 | Berger Creek Crossing (North End)        | 167.39 | 167.39 | 1911      | 2019 | 100' Girder Bridge                |
| 36 | Outlet Creek - 12th Crossing (North End) | 159.6  | 343'   | 1911      | 2020 | 343' Girder Bridge                |
| 37 | Outlet Creek - 11th Crossing (North End) | 157.32 | 270'   | 1911      | 2020 | 270' Girder Bridge                |
| 38 | Outlet Creek - 10th Crossing (North End) | 157.17 | 282'   | 1911      | 2020 | 282' Deck Girder Bridge           |
| 39 | Outlet Creek - 9th Crossing (North End)  | 156.12 | 302'   | 1911      | 2020 | 302' Deck Girder Bridge           |
| 40 | Outlet Creek - 8th Crossing (North End)  | 152.07 | 402'   | 1911      | 2016 | 402' Girder Bridge                |
| 41 | Outlet Creek - 7th Crossing (North End)  | 151.14 | 182'   | 1911      | 2020 | 182' Girder Bridge                |
| 42 | Outlet Creek - 6th Crossing (North End)  | 149.23 | 212'   | 1911      | 2020 | Three 70' Girder Bridge           |
| 43 | Outlet Creek - 5th Crossing (North End)  | 148.17 | 241'   | 1910      | 2020 | 241' Girder Bridge                |
| 44 | Outlet Creek - 4th Crossing (North End)  | 147.75 | 161'   | 1910      | 2020 | 161' Girder Bridge                |
| 45 | Outlet Creek - 3rd Crossing (North End)  | 147.26 | 141'   | 1910      | 2020 | 141' Girder Bridge                |
| 46 | Outlet Creek - 2nd Crossing (North End)  | 145.69 | 206'   | 1911      | 2018 | 206' Through Riveted Truss Bridge |
| 47 | Outlet Creek - 1st Crossing (North End)  | 141.7  | 180'   | 1910      | 2019 | 180' Girder Bridge                |

## Exhibit G – List of Tunnels (believed 50 years old or older)

## Northwestern Pacific Railroad Tunnels

| Photo | Tunnel Number | Location        | MP Number       | Length  | Status           | Year Built | Liner & Portal                                                                                                                                                                                      | Damage                                                                                                                                                                                  | Year Documented |
|-------|---------------|-----------------|-----------------|---------|------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 1,2   | 40            | Table Bluff     | 271.95W/272.34E | 2457.5  | Open             | 1884       | Concrete headwall and wingwalls. Concrete portals on both ends.                                                                                                                                     | Rock fall and displaced timber sets. Wet zone with lagging deteriorated in the crown for 20 feet. Serious drainage issues and standing water on east end of tunnel throughout the year. | 2020            |
| 3,4   | 39            | Shively         | 246.93W/247.13E | 1019.4  | Collapsed        | 1904       | Timber sets and lagging. Concrete portal on west end and timber portal on east end.                                                                                                                 | Lagging is rotted. Rockfall from right quarter arch. Collapse of multiple timber arches, timber and rock on track. Cave-in inside east portal.                                          | 2016            |
| 5,6   | 38            | Bryan's Bluff   | 243.59W/243.79E | 1216.5  | Open             | 1910       | Steels sets of portal extension in place but not completed. Fewer timber sets and doubled-up steel sets. Unlined; timber sets removed/stolen. Concrete east portal and steel supported west portal. | Ponding across the track. Inward displacement of footing and wall, cracks in footings. Many timber supports have been stolen.                                                           | 2018            |
| 7,8   | 37            | McCann          | 234W/234.05E    | 270     | Open             | 1911       | Gunite and steel sets. Concrete portals for both the east and west ends.                                                                                                                            | Moist areas throughout.                                                                                                                                                                 | 2018            |
| 9,10  | 36            | Whitlow         | 228.82W/229.96E | 247.6   | Partial Collapse | 1912       | Gunite. Timber sets and lagging. Concrete headwall, no wingwalls. Concrete east portal and natural west portal.                                                                                     | Damp areas. Crown segment is pushed down. Internal collapse inside the west portal, approximately 10 feet of crown.                                                                     | 2018            |
| 11,12 | 35            | Zook's Bluff    | 227.96W/228.01E | 251.7   | Partial Collapse | 1911       | Steel sets between timber sets and timber lagging. Concrete portals for both the east and west ends.                                                                                                | Timber sets are distressed and lagging has completely rotted away. Very wet areas with steady seepage. Internal collapse inside the east portal, approximately 30 feet of crown.        | 2017/2018       |
| 13,14 | 34            | Eel Rock        | 226.95W/227.02E | 367     | Open             | 1911       | Timber sets and lagging. Concrete portals for both the east and west ends.                                                                                                                          | Timber sets show distress and lagging is deteriorated. Moist areas throughout.                                                                                                          | 2017            |
| None  | 33            | N/A             | N/A             | N/A     | Daylighted       | 1912       | N/A                                                                                                                                                                                                 | N/A                                                                                                                                                                                     | N/A             |
| None  | 32            | N/A             | N/A             | N/A     | Daylighted       | 1912       | N/A                                                                                                                                                                                                 | N/A                                                                                                                                                                                     | N/A             |
| 15,16 | 31            | Steelhead       | 212.45W/212.54E | 468.6   | Open             | 1914/1955  | Concrete between timber sets. Concrete portals for both the east and west ends.                                                                                                                     | Timber sets are rotting out, concrete in the crown is cracked, sags in places, wet areas and ponding in the right ditch.                                                                | 2020            |
| 17,18 | 30            | Alderpoint      | 209.54W/209.60E | 348.2   | Open             | 1914       | Concrete lining. Concrete portals for both the east and west ends.                                                                                                                                  | Cracks along both springlines extend all the way through the tunnel.                                                                                                                    | 2020            |
| 19,20 | 29            | Kekewaka        | 200.90W/200.95E | 278.2   | Open             | 1914       | Concrete between timber sets. Concrete portals for both the east and west ends.                                                                                                                     | Timber sets are rotting out and deterioration around construction joints.                                                                                                               | 2019            |
| 21,22 | 28            | Kekewaka        | 199.78W/199.84E | 263.8   | Open             | 1914       | Steels sets and no gunite throughout. Concrete portals for both the east and west ends.                                                                                                             | No gunite installed.                                                                                                                                                                    | 2019/2020       |
| 23,24 | 27            | Island Mountain | 194.80W/195.62E | 4313.18 | Open             | 1913/1979  | Concrete headwall and wingwalls. Concrete portal for both the east and west ends.                                                                                                                   | Landslide over the east portal. Steady drips of water have resulted in standing water for the first 20 yards of the tunnel during winter/spring months.                                 | 2019            |
| None  | 26            | Ramsey          | N/A             | 182.8   | Daylighted       | 1913       | N/A                                                                                                                                                                                                 | N/A                                                                                                                                                                                     | N/A             |
| None  | 25            | Bell Springs    | N/A             | 265.2   | Daylighted       | 1913       | N/A                                                                                                                                                                                                 | N/A                                                                                                                                                                                     | N/A             |
| 25    | 24            | Bell Springs    | 188.07W/188.15E | 428.9   | Collapsed        | 1913       | Collapsed timber lining segment. Timber sets. Concrete portal for both east and west ends.                                                                                                          | Invert buried by rock and timber lining debris. Timber sets collapsed, rock fragments falling through liner, timber set hit by equipment. Serious internal collapse.                    | 2019            |
| 26,27 | 23            | Spyrock         | 183.14W/183.16E | 106.5   | Open             | 1913       | Gunite Over Rock. Concrete portals for both east and west ends.                                                                                                                                     | Rockfall.                                                                                                                                                                               | 2019            |
| 28    | 22            | River Garden    | 179.18W/179.20E | 128.7   | Open             | 1913       | Concrete headwall and west wingwall. Gunite over rock. Concrete portal for both the east and west ends.                                                                                             | Ditching problems. Large landslide outside west portal.                                                                                                                                 | 2019            |
| 29,30 | 21            | Nashmead        | 175.94W/176.01E | 333     | Collapsed        | 1913       | Timber sets and lagging. Timber structure. Timber supported east portal and concrete west portal.                                                                                                   | Major collapse inside/outside east portal.                                                                                                                                              | 2019            |



|          |    |            |                 |       |                  |           |                                                                                                                       |                                                                                                                                                                                          |      |
|----------|----|------------|-----------------|-------|------------------|-----------|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| 31       | 20 | Nashmead   | 175.24W/175.33E | 465   | Collapsed        | 1913      | Timber sets and lagging. Concrete portals for both the east and west ends.                                            | Major collapse inside east portal.                                                                                                                                                       | 2019 |
| None     | 19 | Woodman    | N/A             | N/A   | Daylighted       | 1912      | N/A                                                                                                                   | N/A                                                                                                                                                                                      | N/A  |
| 32,33    | 18 | Woodman    | 171.42W/171.46E | 194.6 | Partial Collapse | 1912      | Concrete rock shed. Unlined. Steel sets and partial lagging. Concrete east portal and concrete rock shed west portal. | Rock shed demolished by rock slide. Deteriorated concrete and exposed rebar. Sporadic rockfalls. Lagging missing.                                                                        | 2019 |
| 34,35    | 17 | Deer Lodge | 169.64W/169.68E | 173.2 | Collapsed        | 1912      | Timber sets and lagging. Concrete east portal and timber supported west portal.                                       | Large internal collapse inside east portal.                                                                                                                                              | 2019 |
| 36,37    | 16 | Dos Rios   | 166.95W/167.03E | 375.6 | Open             | 1911      | Timber structure. Timber sets and lagging. Concrete east portal and timber supported west portal.                     | Rockslide has buried the track and deposited rock 20' into the tunnel. Lagging deteriorated.                                                                                             | 2019 |
| 38,39    | 15 | Farley     | 163.61W/163.69E | 335.5 | Collapsed        | 1911      | Timber sets and lagging. Concrete portals for both the east and west ends.                                            | Large internal collapse inside east portal.                                                                                                                                              | 2019 |
| 40,41    | 14 | Farley     | 160.92W/160.98E | 380.8 | Collapsed        | 1911      | Concrete. Concrete portals for both the east and west ends.                                                           | Large internal collapse inside east portal.                                                                                                                                              | 2016 |
| 42,43    | 13 | Longvale   | 156W/156.04E    | 228.2 | Collapsed        | 1911      | Timber sets and lagging with steel helper beams. Concrete portals for both the east and west ends.                    | Large internal collapse inside the west portal.                                                                                                                                          | 2020 |
| 44,45    | 12 | Arnold     | 149.94W/160.12E | 881.2 | Open             | 1911/1984 | Concrete portals. Lined internally with gunite. Concrete portals for both the east and west ends.                     | Timber sets have deteriorated and internal sporadic rock falls throughout.                                                                                                               | 2019 |
| 46,47,48 | 11 | Outlet     | 149.49W/145.60E | 657.8 | Collapsed        | 1910/1995 | Concrete headwall and wingwalls. Steel sets, sparse timber lagging. Concrete portals for both the east and west ends. | Large internal collapse spans just inside the west portal to about 25 yards from the east portal. Large chunk of tunnel crown caved-in just inside the east portal, daylight is visible. | 2018 |

## Exhibit H – List of Structures (believed 50 years old or older)

## Northwestern Pacific Railroad Depots and Historic Structures

| <i>Photo</i> | <i>Location</i>                                | <i>Age of Structure</i> | <i>Type of Structure</i>                         | <i>Status</i>   | <i>Year Documented</i> |
|--------------|------------------------------------------------|-------------------------|--------------------------------------------------|-----------------|------------------------|
| 1            | Blue Lake (Arcata & Mad River Railroad Branch) | Pre-1910                | Non-Southern Pacific Standard Depot              | Privately Owned | 2017                   |
| 2            | Eureka                                         | Pre-1970                | Non-Southern Pacific Standard Depot              | Condemned       | 2019                   |
| 3            | Eureka                                         | Pre-1930                | Locomotive Turntable                             | Condemned       | 2018                   |
| 4            | Fernbridge                                     | Pre-1910                | Southern Pacific Standard Depot No. 23 Design    | Privately Owned | 2020                   |
| 5            | Alton                                          | Pre-1950                | Southern Pacific Phone Booth                     | Condemned       | 2016                   |
| 6            | Scotia                                         | 1965                    | Wood Structure                                   | Condemned       | 2020                   |
| 7            | McCann                                         | Pre-1950                | Southern Pacific Phone Booth                     | Condemned       | 2019                   |
| 8            | Fort Seward                                    | Pre-1910                | Non-Southern Pacific Standard Depot              | Condemned       | 2018                   |
| 9            | Fort Seward                                    | Pre-1940                | Southern Pacific Steam-Era Water Tower           | Condemned       | 2019                   |
| 10           | Milepost 201.0                                 | 1939                    | Concrete Culvert                                 | Condemned       | 2020                   |
| 11           | Island Mountain                                | Pre-1965                | Storage Facility (Wood Structure)                | Condemned       | 2019                   |
| 12           | Island Mountain                                | Pre-1965                | Cookhouse (Wood Structure)                       | Condemned       | 2019                   |
| 13           | Island Mountain                                | Pre-1965                | Shed (Wood Structure)                            | Condemned       | 2019                   |
| 14           | Island Mountain                                | 1965                    | Four Metal Structures                            | Condemned       | 2019                   |
| 15           | Island Mountain                                | Pre-1965                | Southern Pacific Phone Booth                     | Condemned       | 2019                   |
| 16           | Dos Rios                                       | 1965                    | Two Overhangs (Wooden Structures)                | Condemned       | 2016                   |
| 17           | Willits                                        | Pre-1970                | Non-Southern Pacific Standard Depot              | Condemned       | 2019                   |
| 18           | Willits                                        | 1915                    | Southern Pacific Craftsman-style Passenger Depot | Open            | 2017                   |

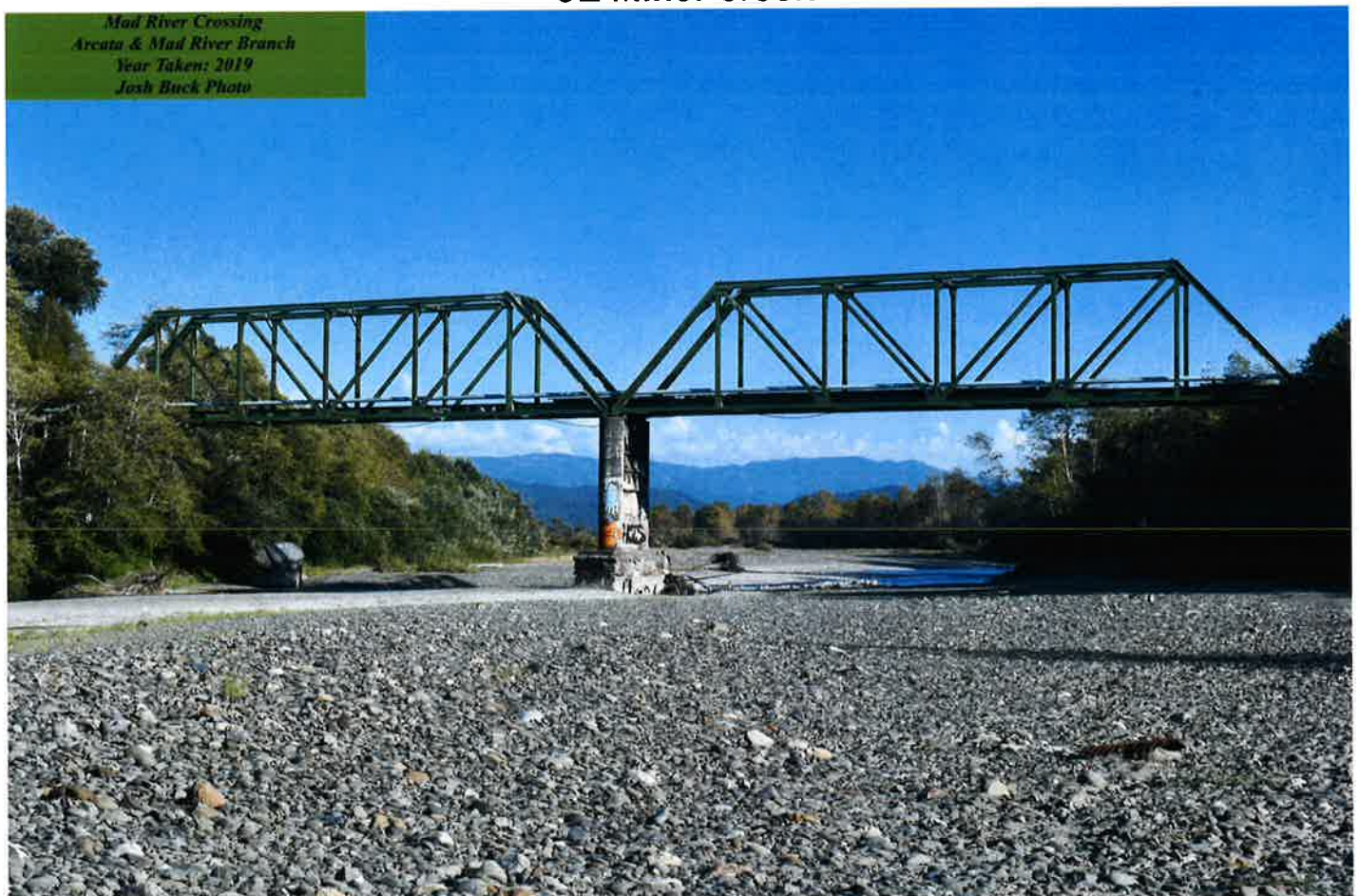


## Exhibit I – Pictures of items in Exhibit F (Bridges)

## Bridges



01 Minor Creek



02 Mad River



## Bridges

*Green Tank Trestle  
Arcata & Mad River Branch  
Year Taken: 2020  
Josh Buck Photo*



**03 Green Tank**

*Schoolhouse Trestle  
Arcata & Mad River Branch  
Year Taken: 2020  
Josh Buck Photo*



**04 Schoolhouse**



## Bridges



05 Warren Creek



06 Mad River Slough



## Bridges

*McDaniel Slough Crossing  
Samoa Branch  
Year Taken: 2019  
Josh Buck Photo*



**07 McDaniel Slough**

*Second Jolly Giant Creek Crossing  
Korblex Branch  
Year Taken: 2015  
Josh Buck Photo*



**08 Second Jolly Giant Creek**



## Bridges

*First Jolly Giant Creek Crossing  
Korblex Branch  
Year Taken: 2020  
Josh Buck Photo*



09 First Jolly Giant Creek

*Jacoby Creek Crossing  
Korblex Branch  
Year Taken: 2020  
Josh Buck Photo*



10 Jacoby Creek



## Bridges

*Gannon Slough Crossing  
Korblax Branch  
Year Taken: 2020  
Josh Buck Photo*



**11 Gannon Slough**

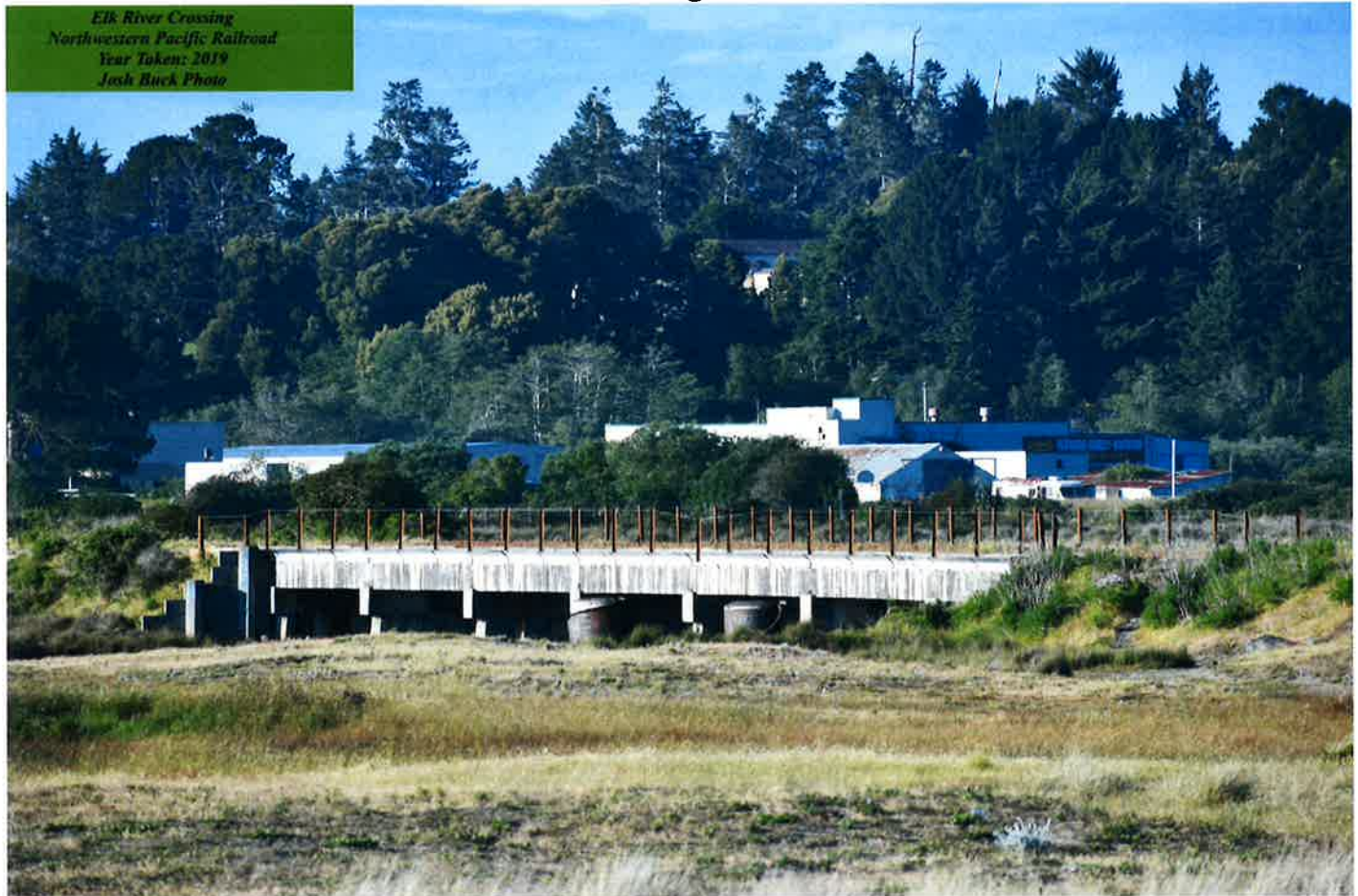
*Eureka Slough Crossing  
Korblax Branch  
Year Taken: 2018  
Josh Buck Photo*



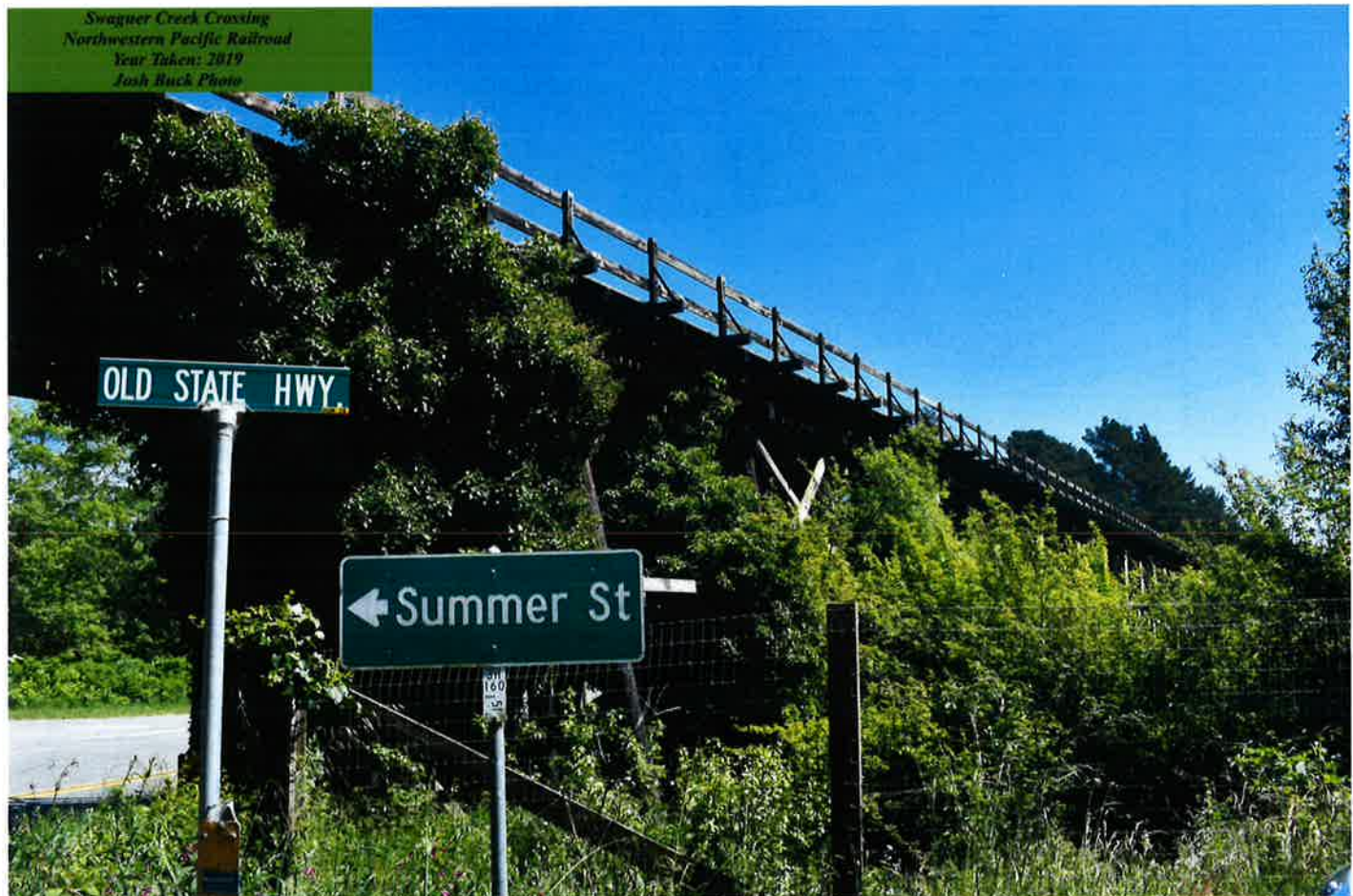
**12 Eureka Slough**



## Bridges



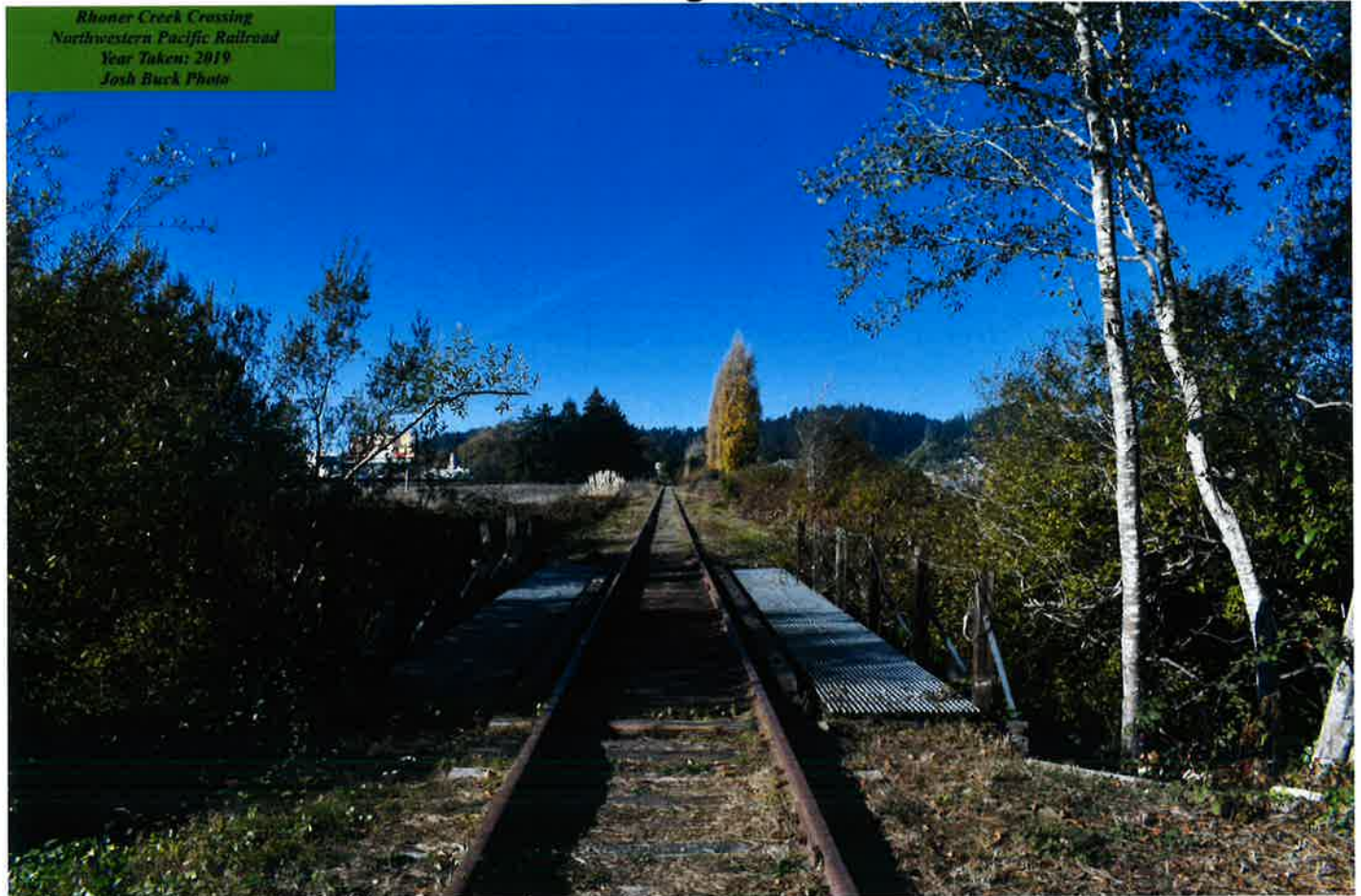
13 Elk River



14 Swauger Creek



## Bridges



15 Rhoner Creek



16 Yager Creek



## Bridges

*Van Duzen River Crossing  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



**17 Van Duzen River**

*Nanning Creek Crossing  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



**18 Nanning Creek**



## Bridges



19 Stitz Creek



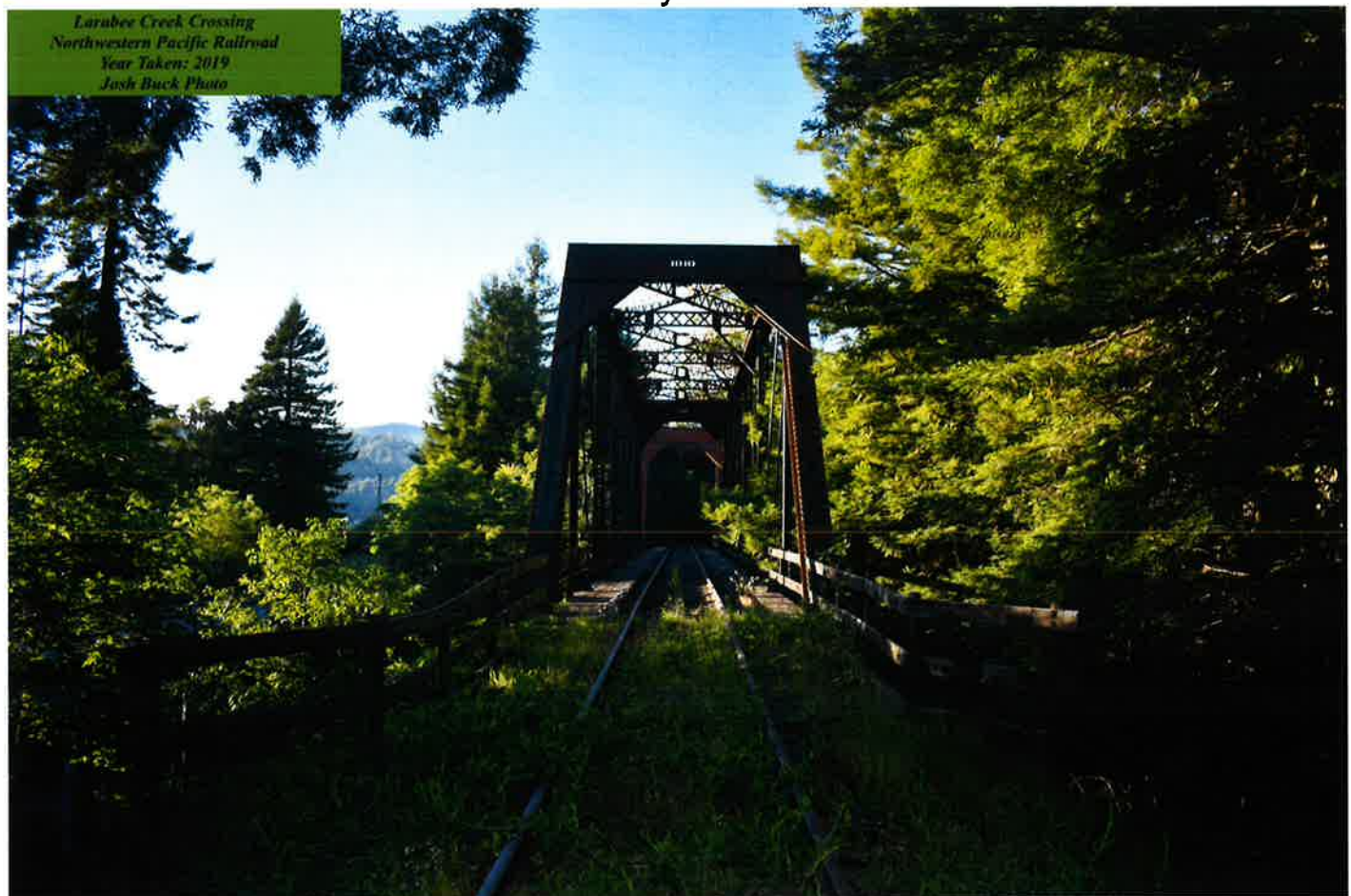
20 Shively Creek Second



## Bridges



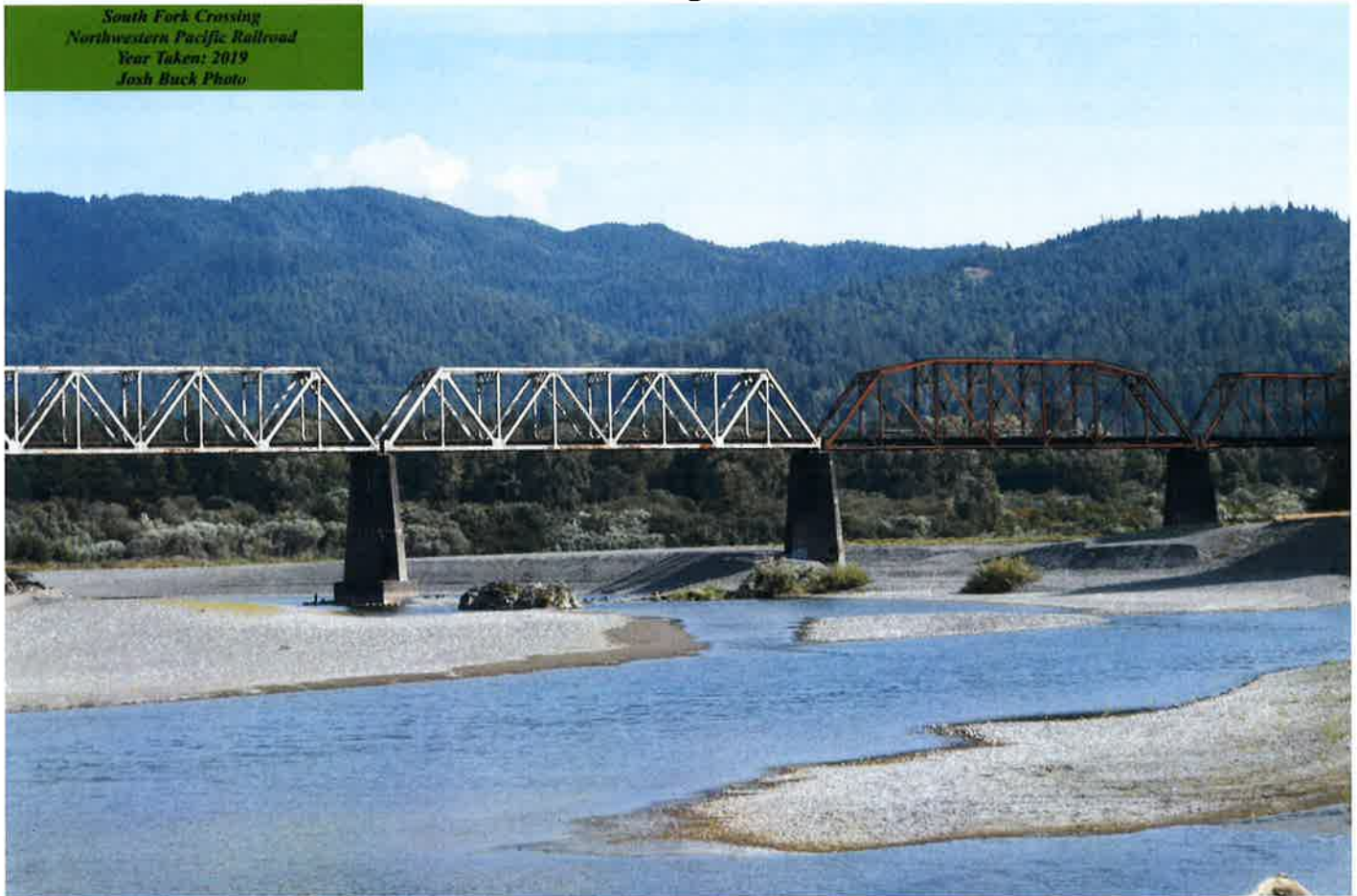
21 Shively Creek First



22 Larabee Creek



## Bridges



**23 South Fork**



**24 Dyersville Loop Road**



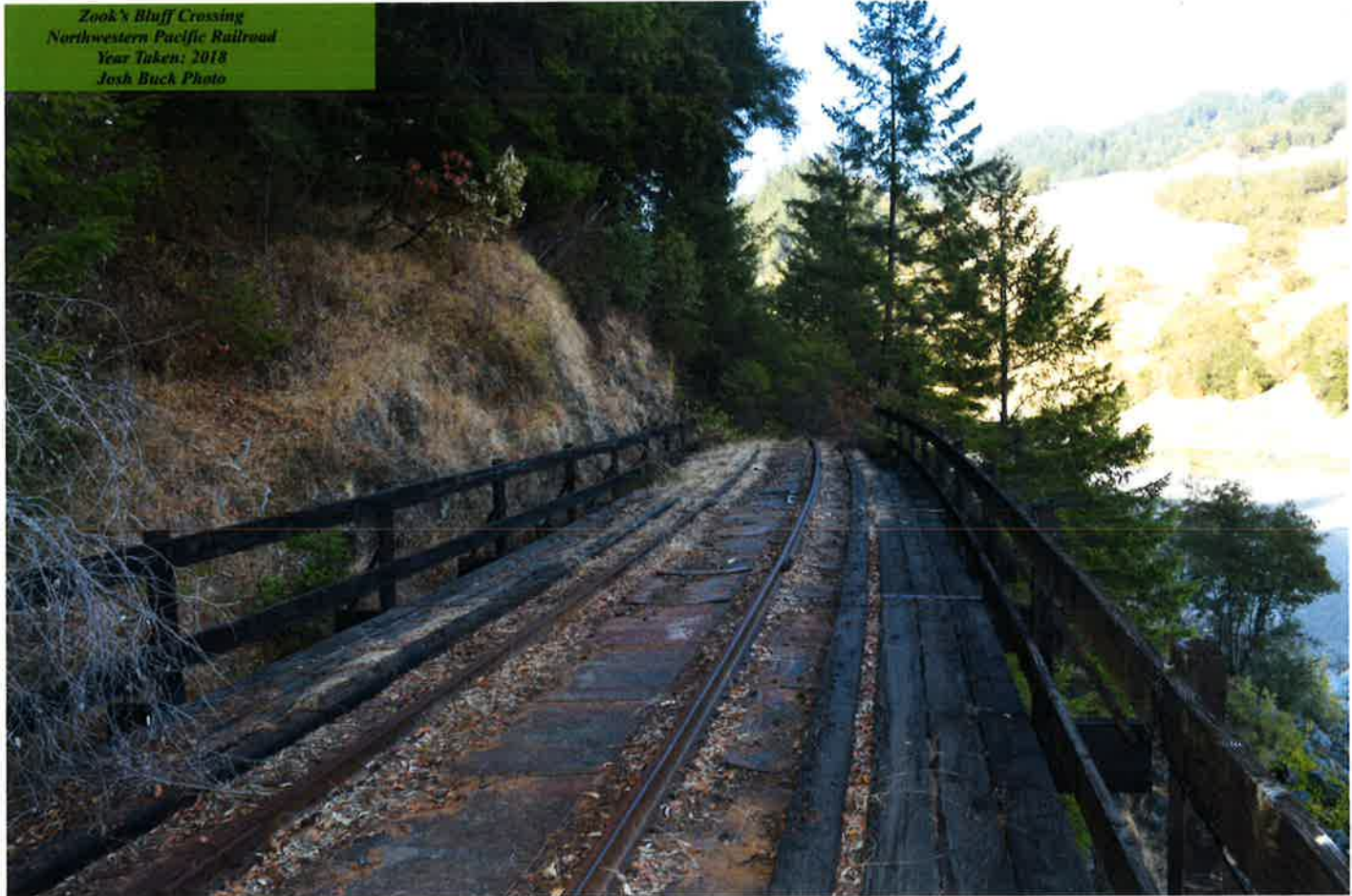
## Bridges

*Sonoma Creek Crossing  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



25 Sonoma Creek

*Zook's Bluff Crossing  
Northwestern Pacific Railroad  
Year Taken: 2018  
Josh Buck Photo*



26 Zooks Bluff



## Bridges



27 Brock Creek



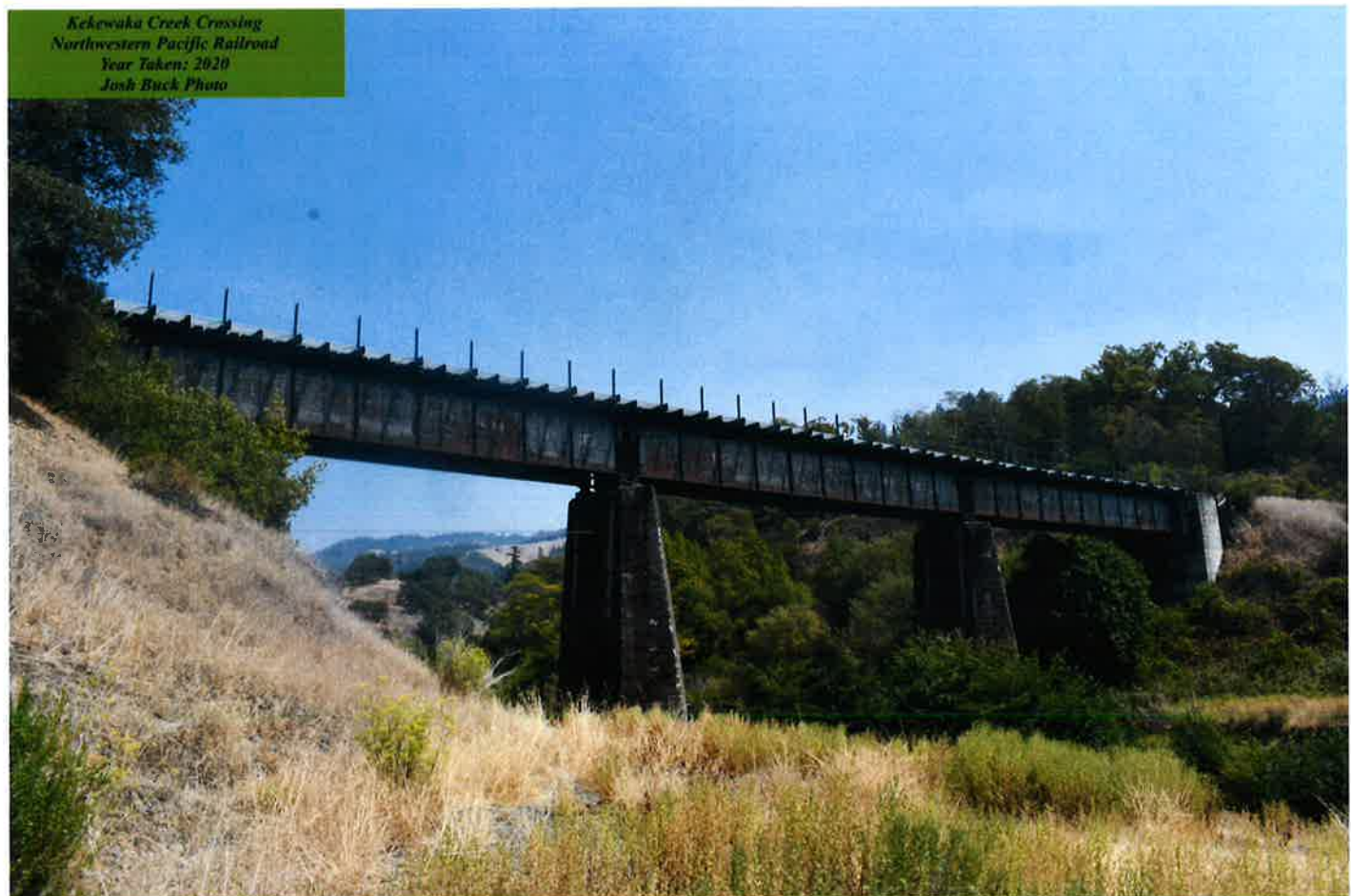
28 Steelhead



## Bridges



29 Cain Rock



30 Kekewaka Creek



## Bridges



**31 Island Mountain**



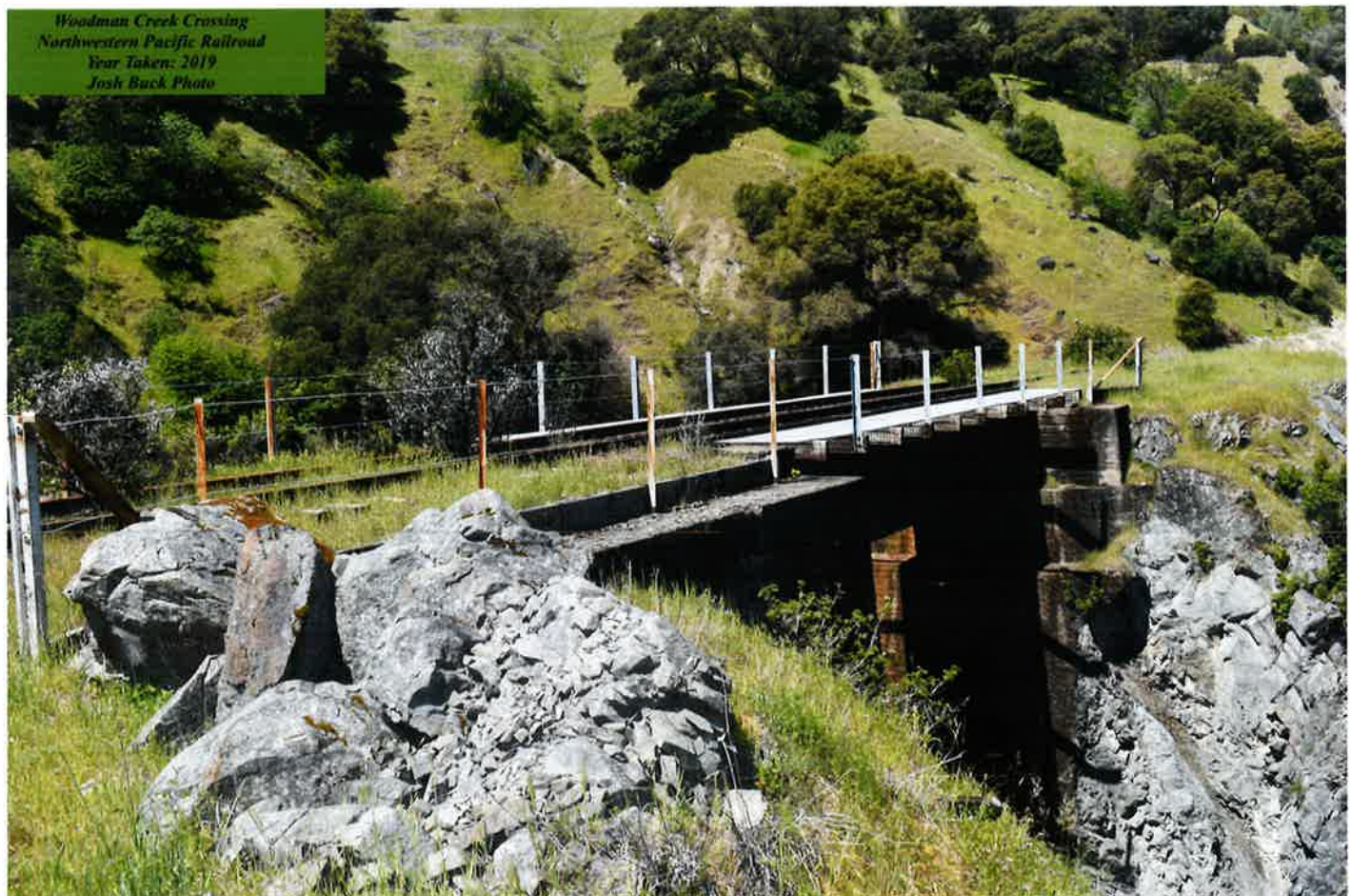
**32 Bell Springs**



## Bridges



**33 Blue Rock Creek**



**34 Woodman Creek**



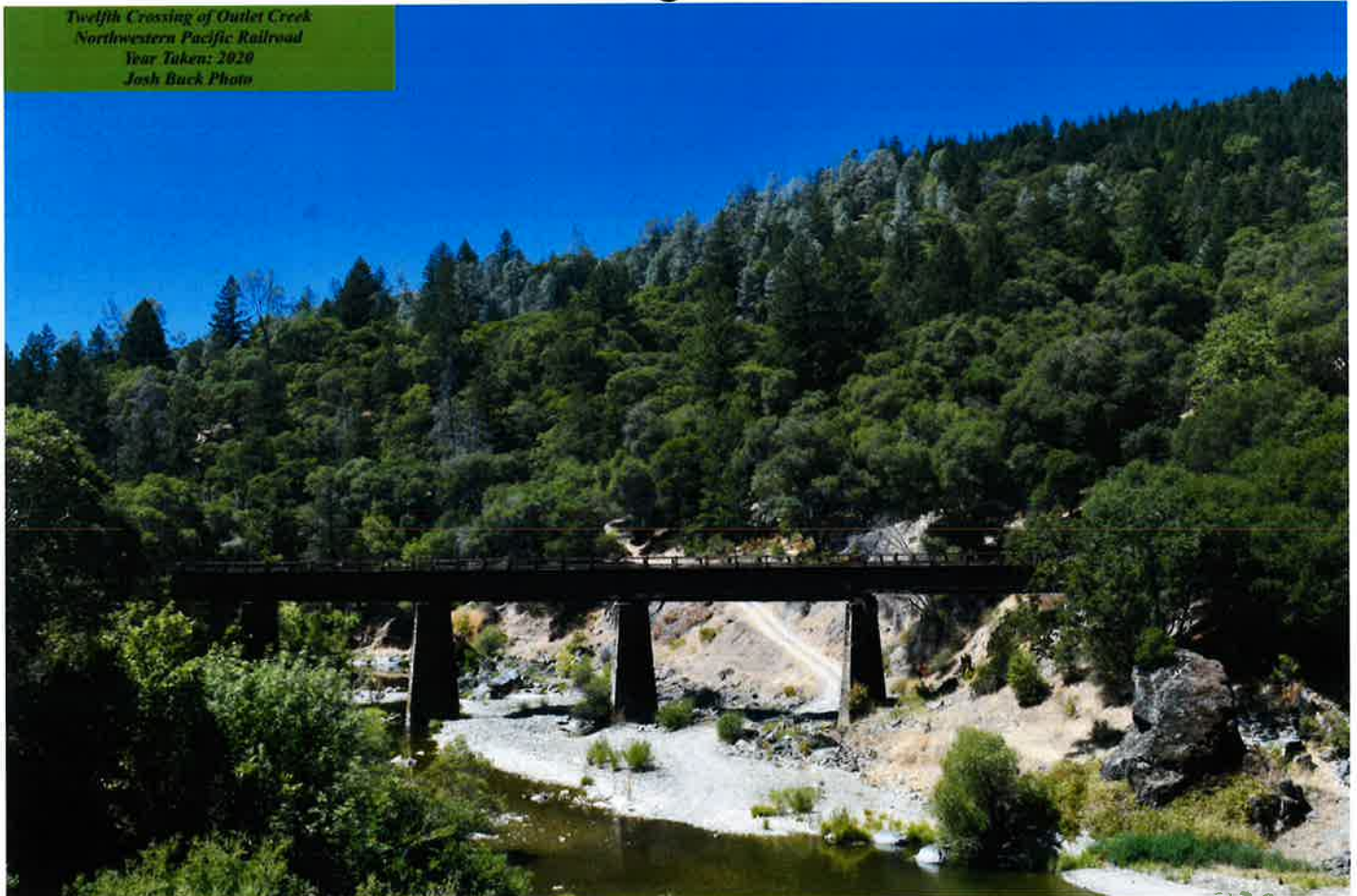
## Bridges

*Berger Creek Crossing  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



35 Berger Creek

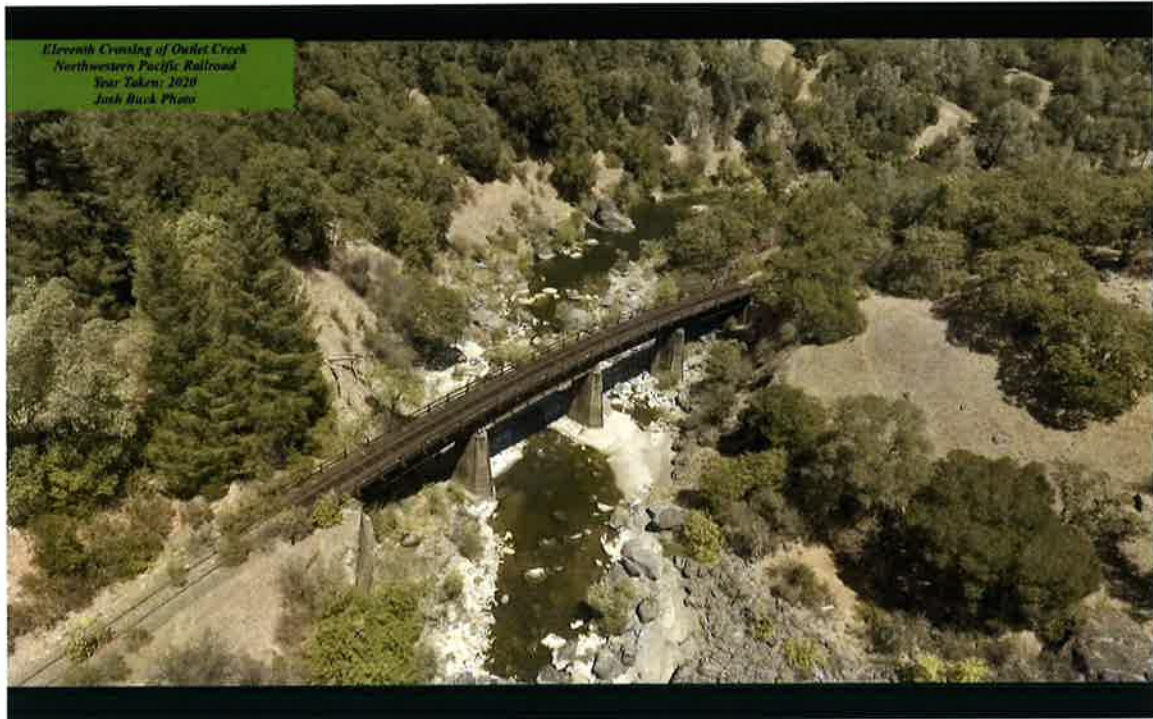
*Twelfth Crossing of Outlet Creek  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



36 Outlook Creek 12



## Bridges



**37 Outlook Creek 11**

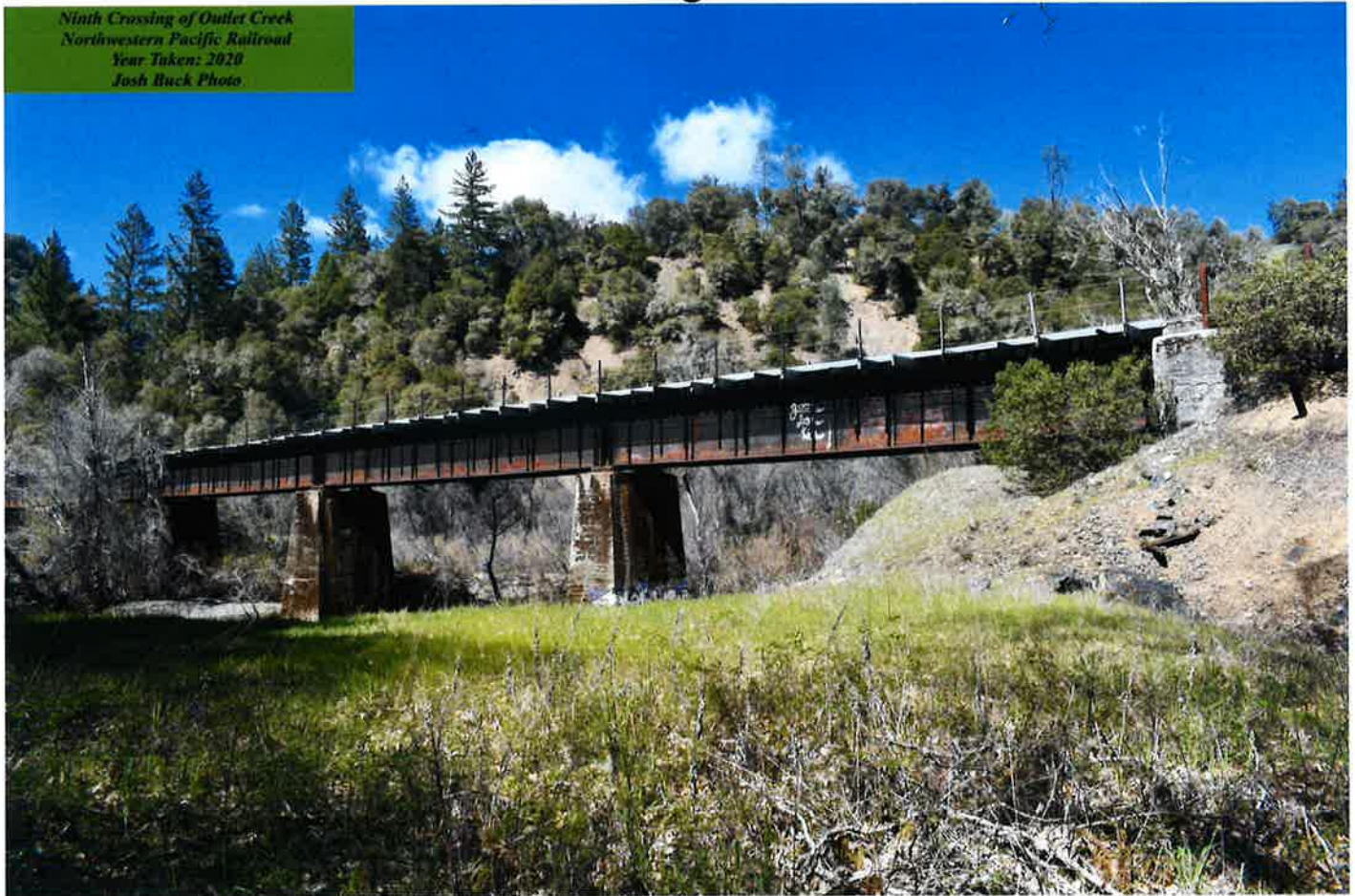


**38 Outlook Creek 10**



## Bridges

*Ninth Crossing of Outlet Creek  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



39 Outlook Creek 9

*Eighth Crossing of Outlet Creek  
Northwestern Pacific Railroad  
Year Taken: 2016  
Josh Buck Photo*



40 Outlook Creek 8



## Bridges



41 Outlook Creek 7



42 Outlook Creek 6



## Bridges

*Fifth Crossing of Outlet Creek  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



43 Outlook Creek 5

*Fourth Outlet Creek Crossing  
Northwestern Pacific Railroad  
Year Taken: 2020  
Josh Buck Photo*



44 Outlook Creek 4



## Bridges



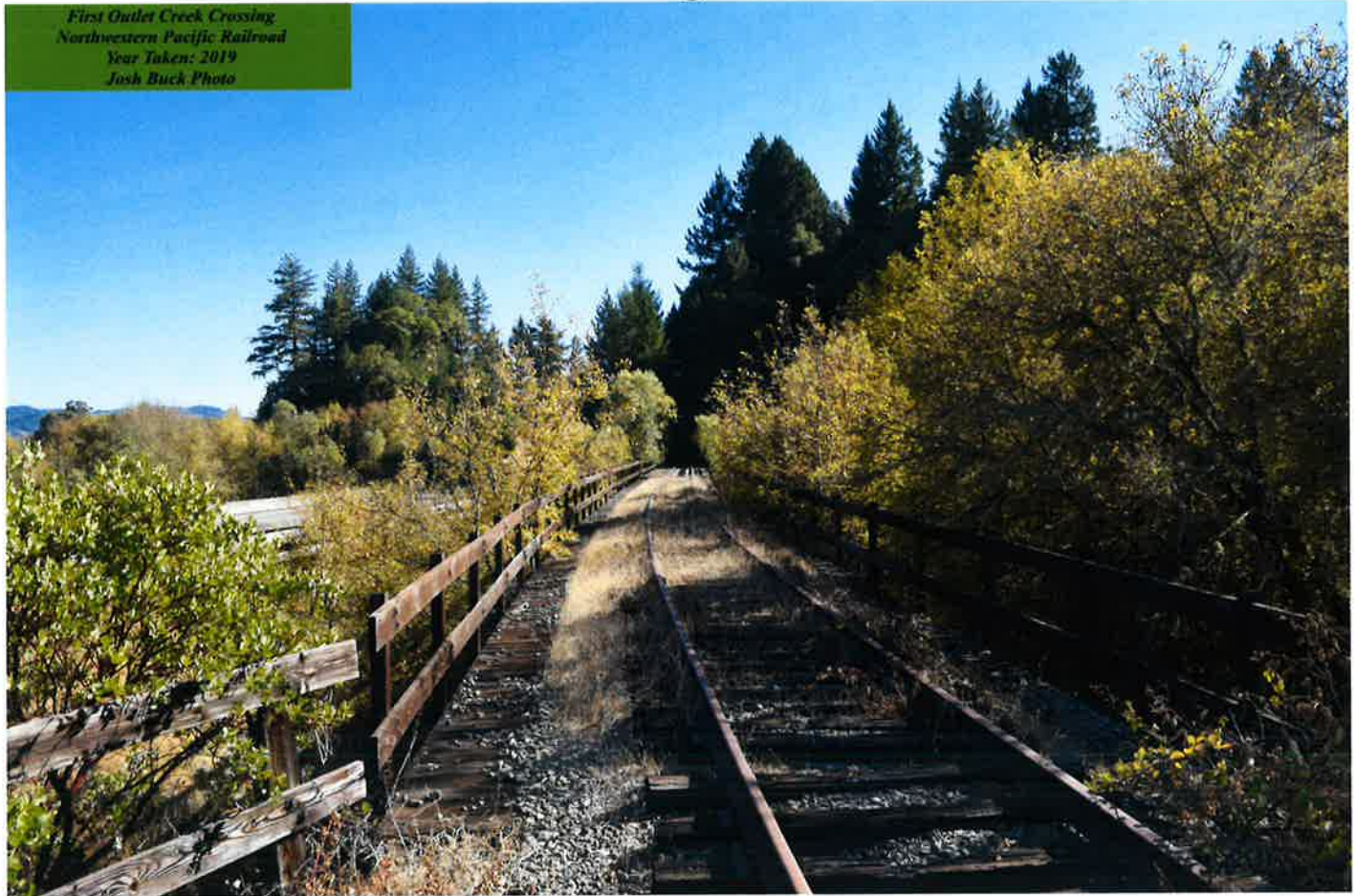
45 Outlook Creek 3



46 Outlook Creek 2



## Bridges

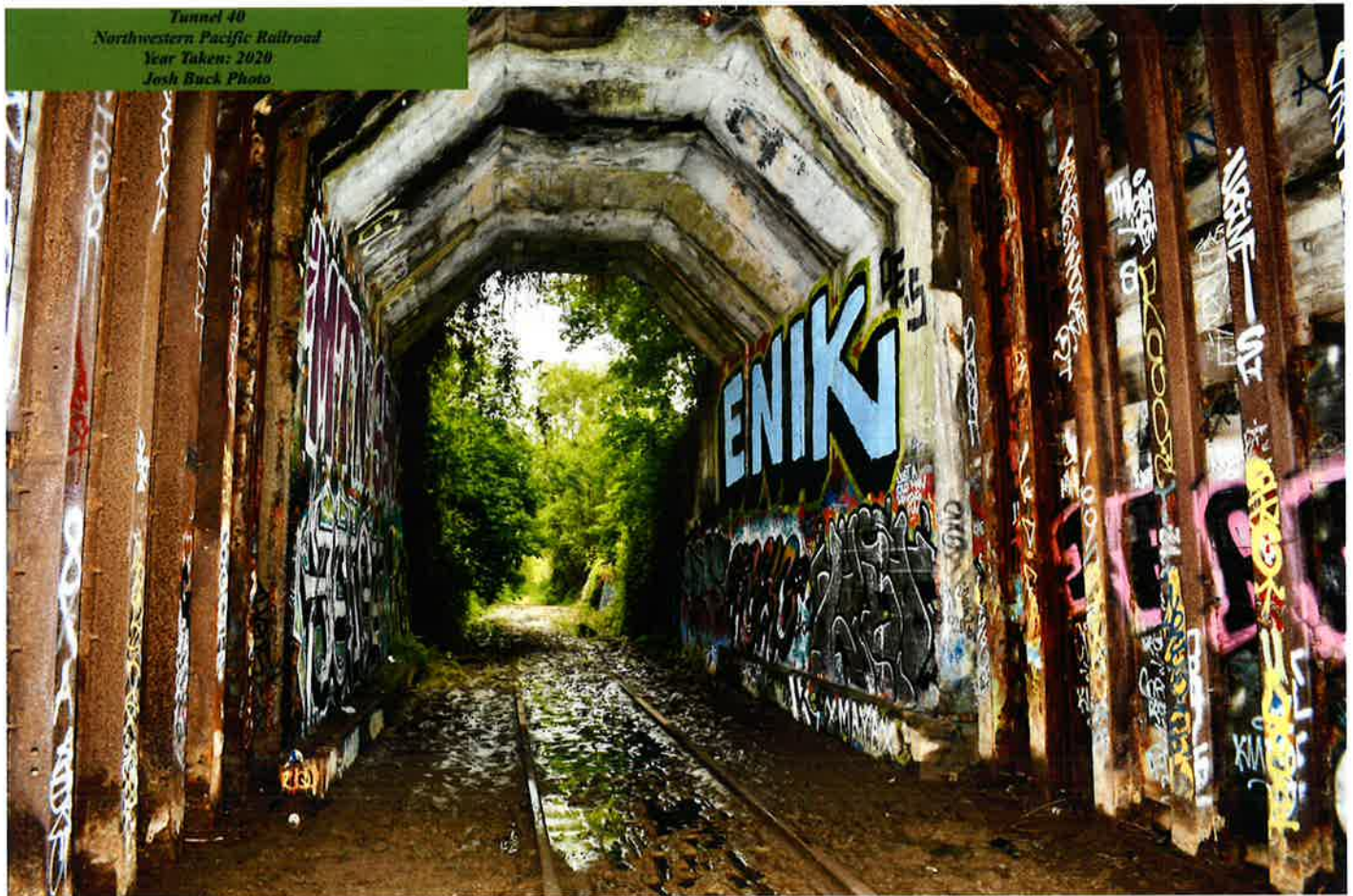


47 Outlook Creek 1

## Exhibit J – Pictures of items in Exhibit G (Tunnels)



## Tunnels



01 Tunnel 40



02 Tunnel 40

## Tunnels



03 Tunnel 39



04 Tunnel 39



## Tunnels



05 Tunnel 38



06 Tunnel 38



## Tunnels



07 Tunnel 37



08 Tunnel 37



## Tunnels



**09 Tunnel 36**



**10 Tunnel 36**

## Tunnels



11 Tunnel 35



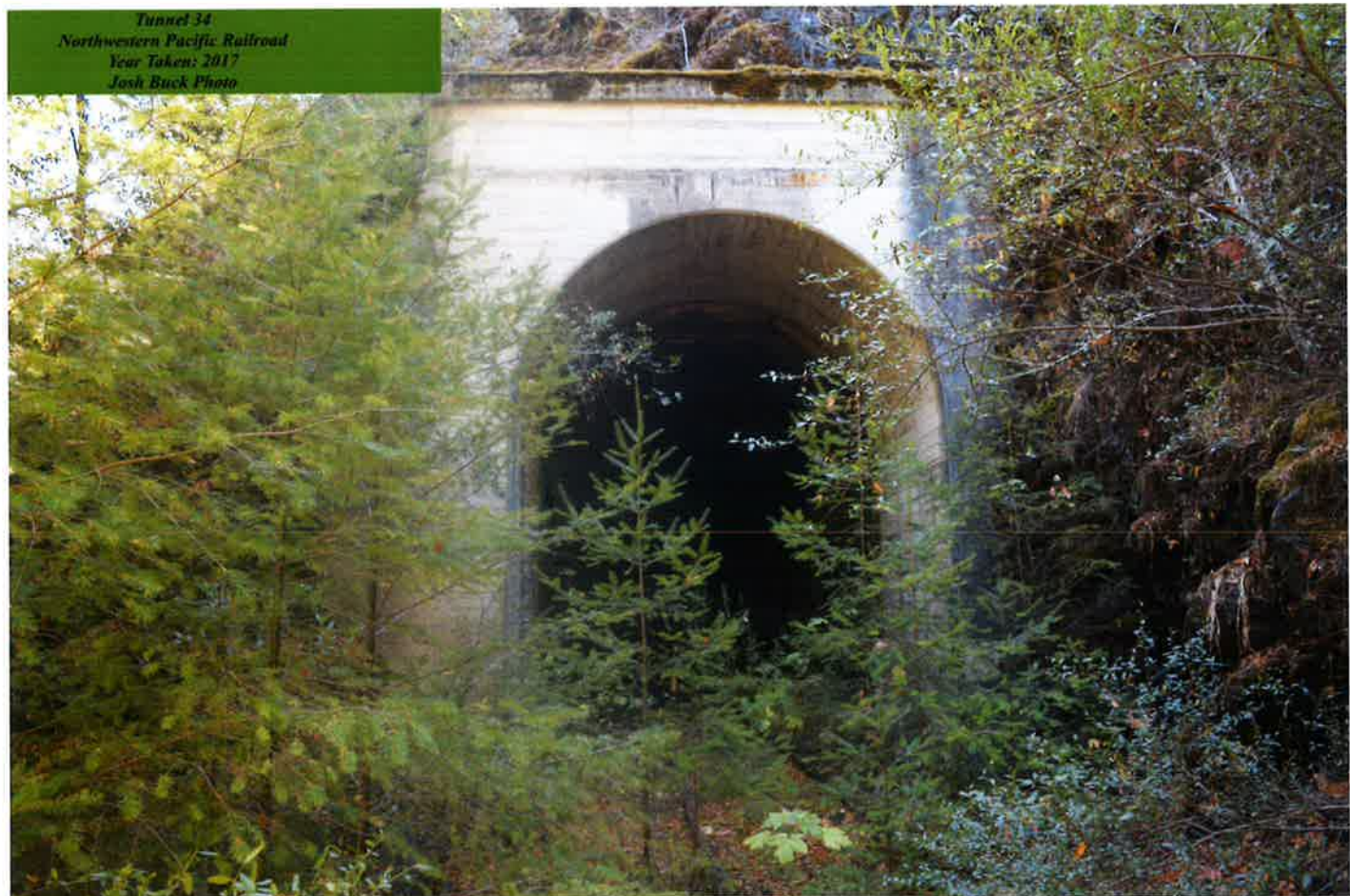
12 Tunnel 35



## Tunnels



13 Tunnel 34



14 Tunnel 34



## Tunnels



15 Tunnel 31



16 Tunnel 31



## Tunnels



17 Tunnel 30



18 Tunnel 30



## Tunnels



**19 Tunnel 29**



**20 Tunnel 29**



## Tunnels



21 Tunnel 28



22 Tunnel 28



## Tunnels

*Tunnel 27  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Huck Photo*



**23 Tunnel 27**

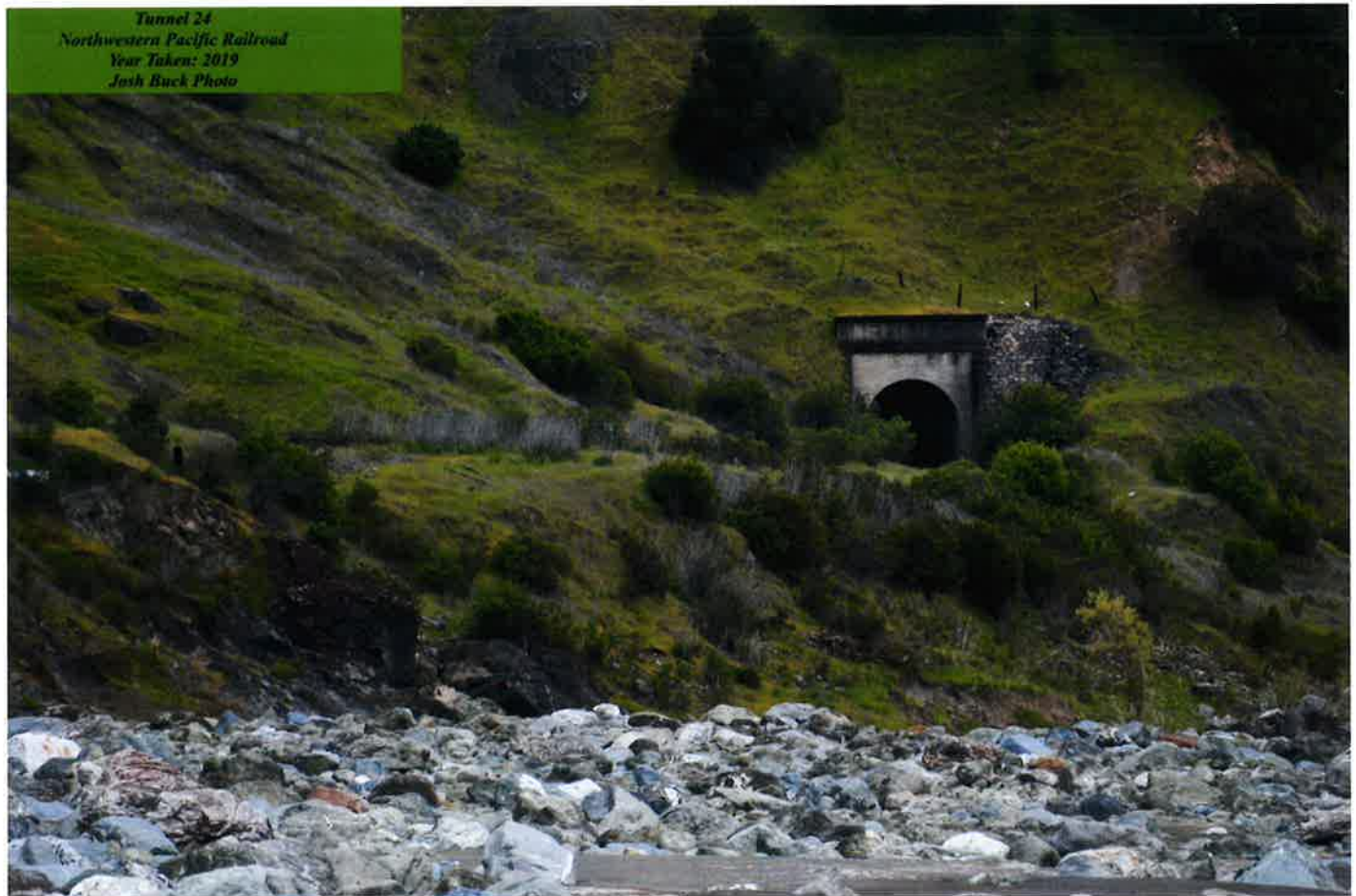
*Tunnel 27  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Huck Photo*



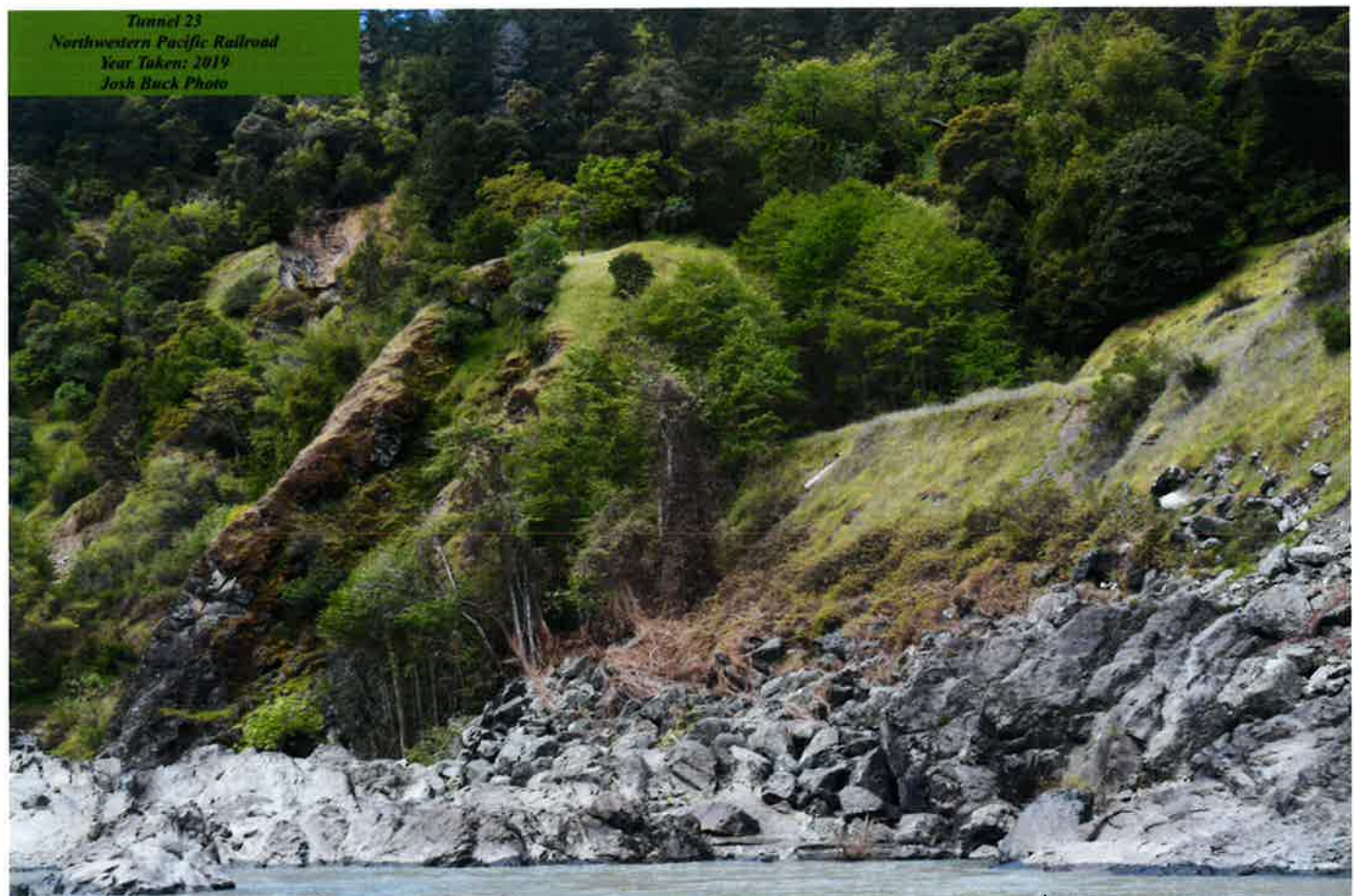
**24 Tunnel 27**



## Tunnels



25 Tunnel 24



26 Tunnel 23



## Tunnels

*Tunnel 23  
Northwestern Pacific Railroad  
Year Taken: 1986  
Josh Buck Collection*



27 Tunnel 23

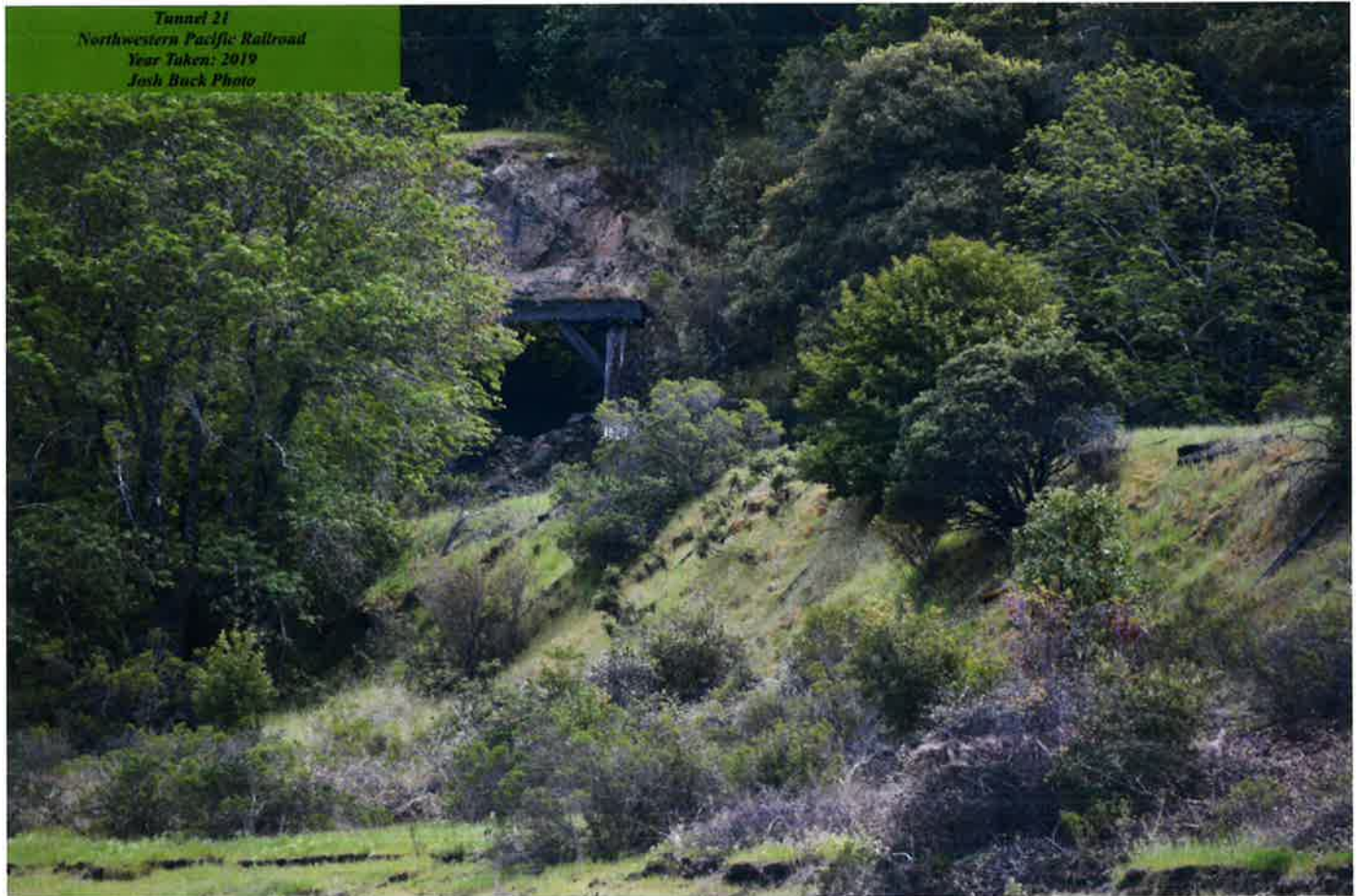
*Tunnel 22  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



28 Tunnel 22



## Tunnels



29 Tunnel 21



30 Tunnel 21



## Tunnels



31 Tunnel 20



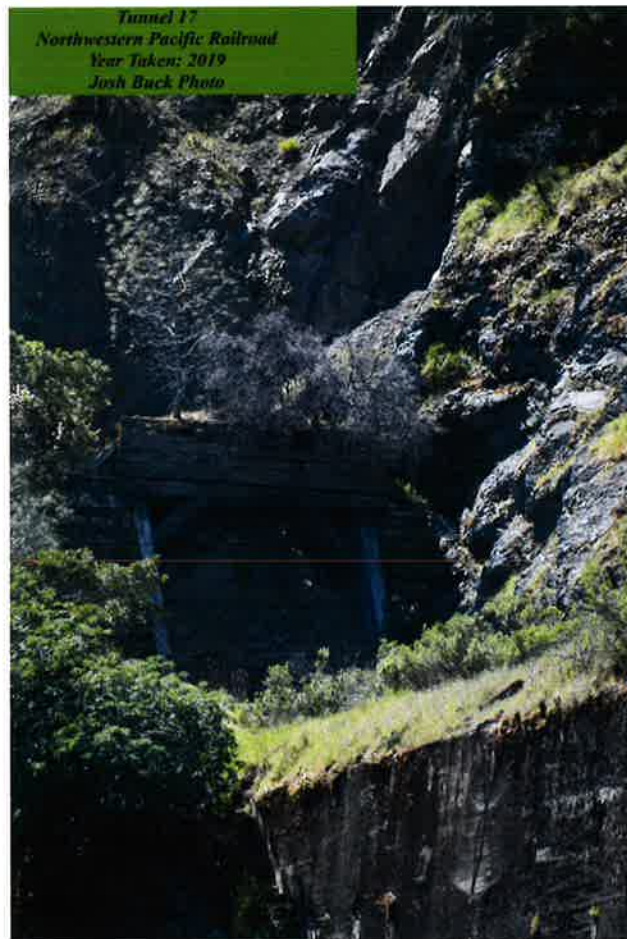
32 Tunnel 18



## Tunnels



**33 Tunnel 18**



**34 Tunnel 17**



## Tunnels



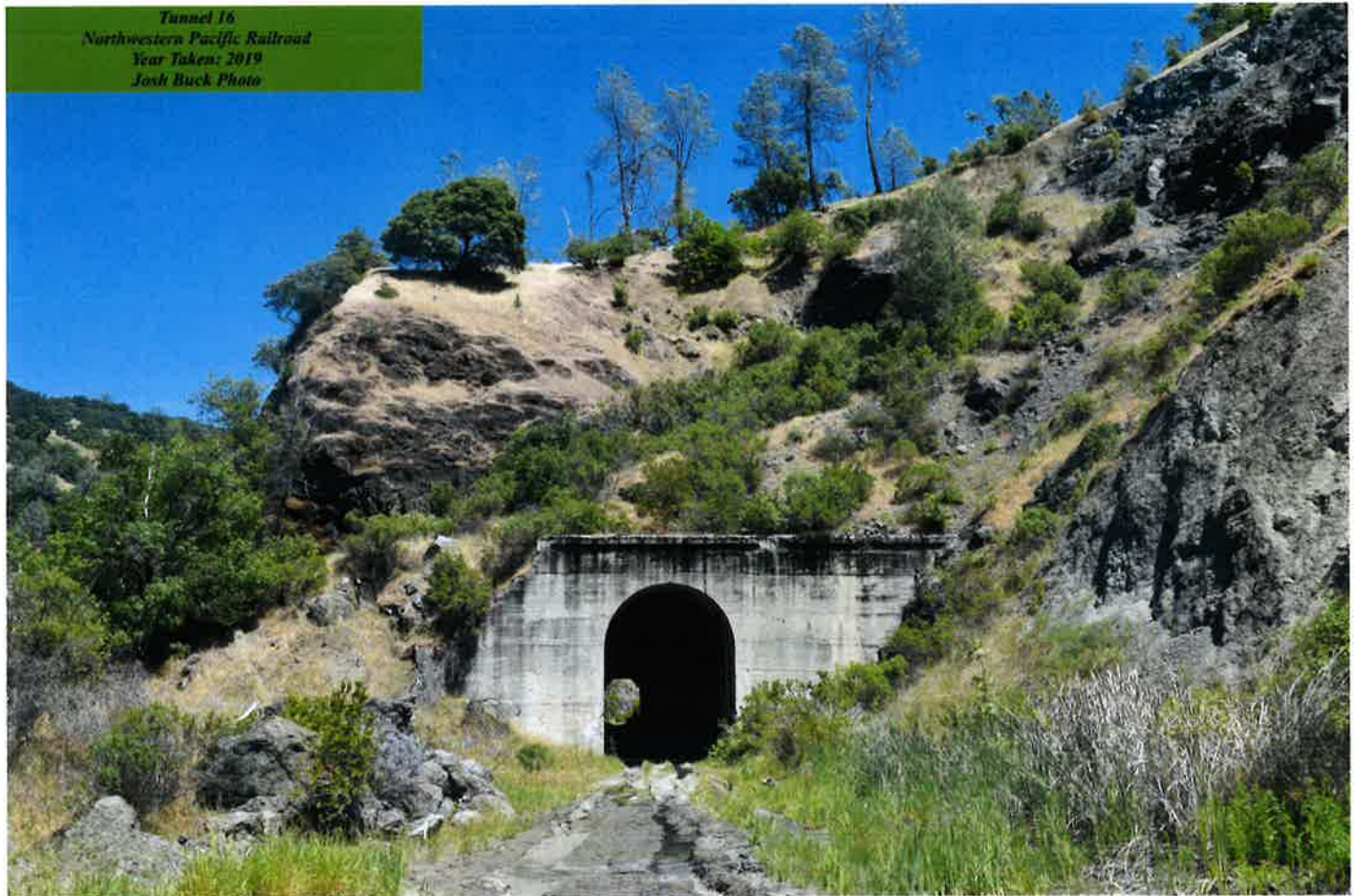
35 Tunnel 17



36 Tunnel 16



## Tunnels



37 Tunnel 16



38 Tunnel 15



## Tunnels



39 Tunnel 15



40 Tunnell 14



## Tunnels



**41 Tunnel 14**



**42 Tunnel 13**



## Tunnels



**43 Tunnel 13**



**44 Tunnel 12**



## Tunnels



45 Tunnel 12



46 Tunnel 11



## Tunnels



47 Tunnel 11



48 Tunnel 11



## Exhibit K – Pictures of items in Exhibit H (Structures)

## Structures

*Blue Lake Depot  
Arcata & Mad River Branch  
Year Taken: 2017  
Josh Buck Photo*



01 Blue Lake

*Eureka Depot (NCRA)  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



02 Eureka Depot



## Structures



03 Eureka Turntable



04 Fernbridge Depot



## Structures



05 Alton Phone Booth



06 Scotia Depot



## Structures

*Historic Structure: McCann SP Phone Booth  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



07 McCann Phone Booth

*Fort Seward Depot  
Northwestern Pacific Railroad  
Year Taken: 2018  
Josh Buck Photo*



08 Fort Seward Depot



## Structures



09 Fort Seward Water Tower



10 Milepost 201.0 Culvert



## Structures

*Historic Structure: Island Mountain Storage Facility  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



**11 Iron Mountain Storage Facility**

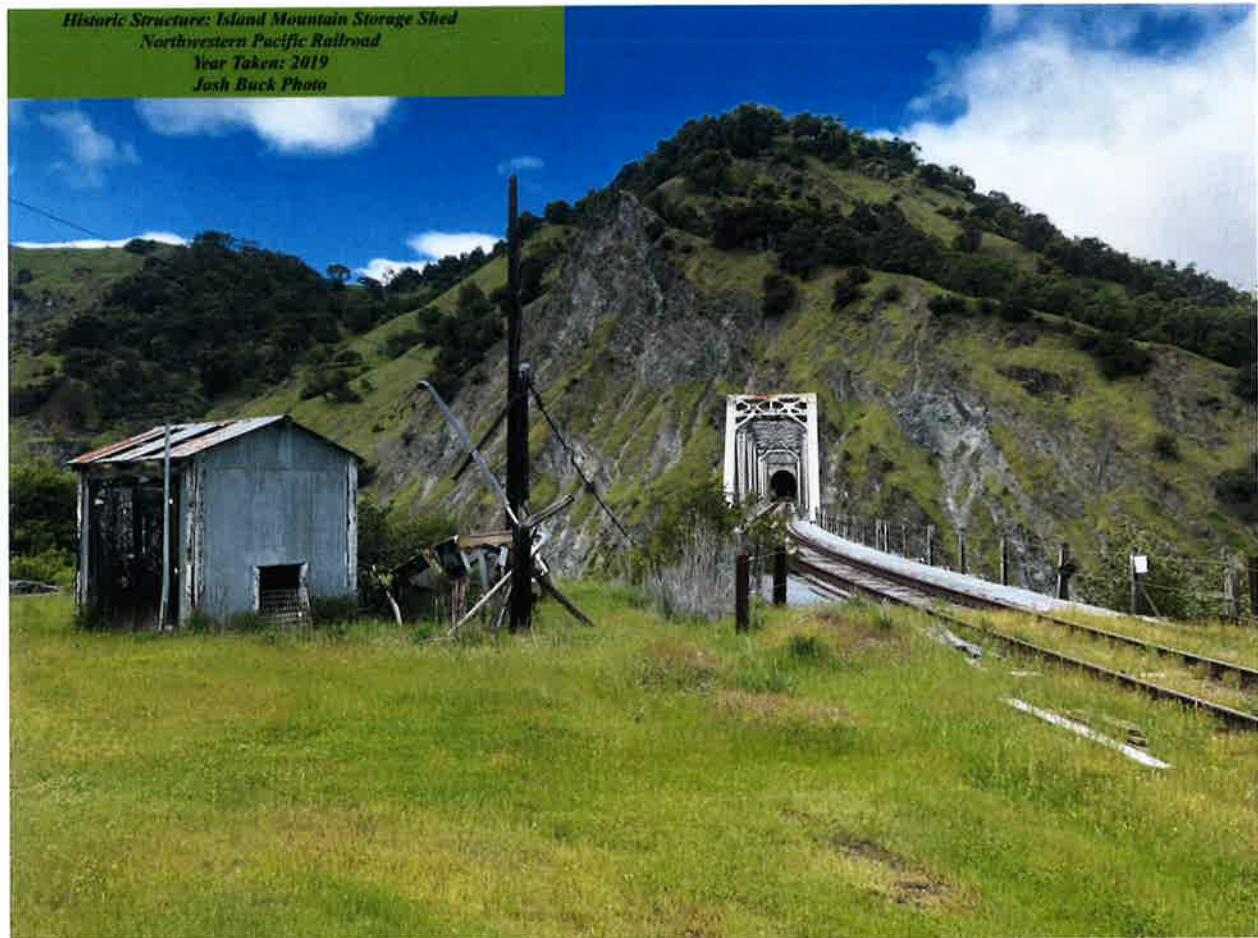
*Historic Structure: Island Mountain Cookhouse  
Northwestern Pacific Railroad  
Year Taken: 2019  
Josh Buck Photo*



**12 Island Mountain Cookhouse**



## Structures



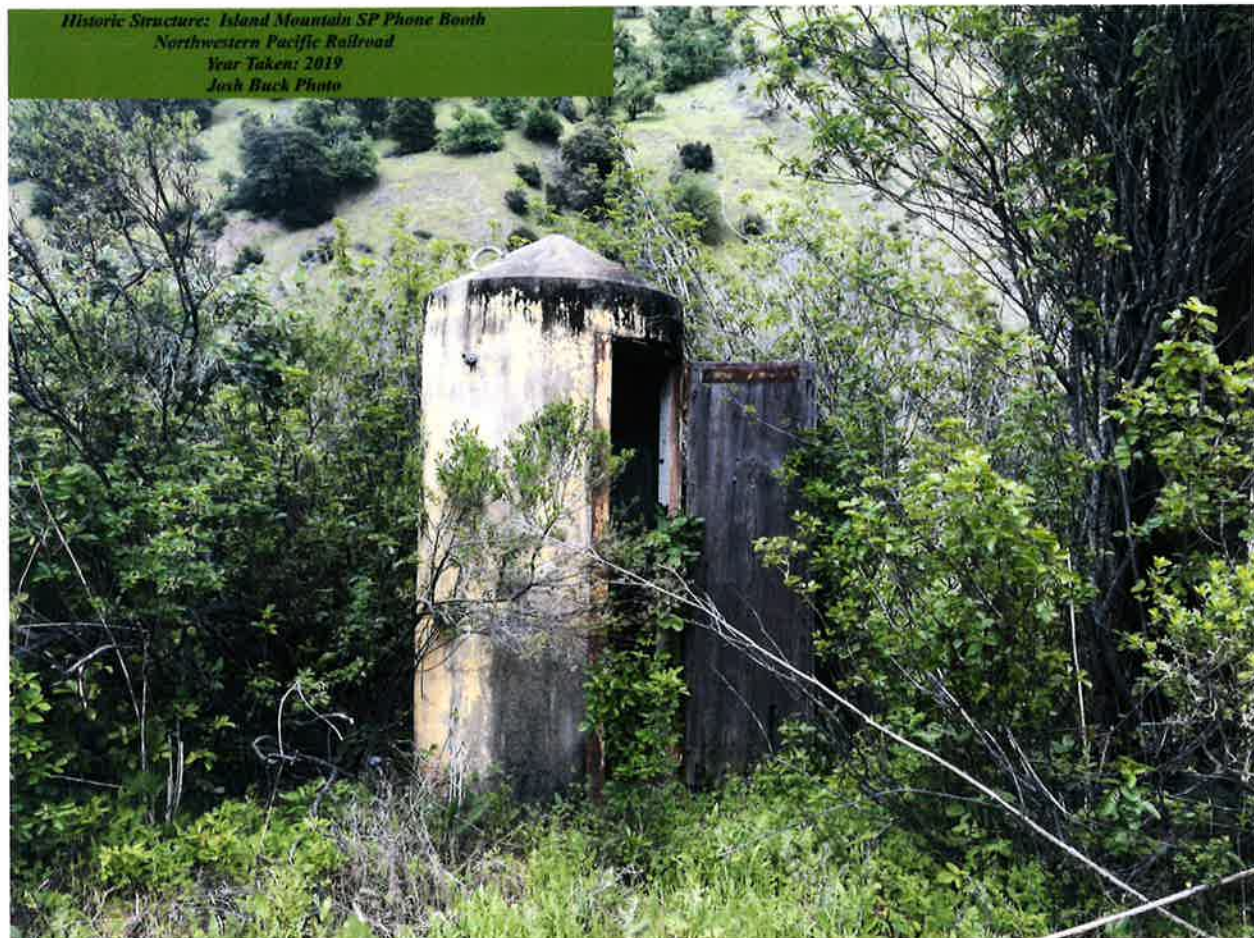
**13 Island Mountain Shed**



**14 Island Mountain Metal Structures**



## Structures



**15 Island Mountain Phone Booth**



**16 Dos Rios Overhangs**



## Structures



**17 Willits Depot**



**18 Willits Passenger Depot**



## Exhibit L – State Report Historic and Archeological Resource Summary

County, no direct or indirect impacts are anticipated by the resumption of railroad operations (NCRA 2009:3.3/37). Presumably the same would be true for repurposing the corridor for trail use given that the homes are located on the east side of Madden Street, at least 200 feet from the rail corridor.

#### *MP 139.5 Willits Depot, Willits*

The Willits Depot at 299 East Commercial Street (MP 139.5; Figure D-6) in Willits was listed in the NRHP in 1999 and is listed in the CRHR. Also known as the NWP Depot and the “Skunk” Depot, the depot consists of a complex of three wood-frame buildings, built in 1915: the Willits Depot proper, a restaurant building joined by a covered breezeway, and a detached baggage building. The three buildings, all with redwood construction throughout, reflect Arts & Crafts-influenced Chalet-style (Craftsman) designs and are among the most architecturally distinctive small-scale depot buildings in California. The Willits Depot complex is also associated with the final push to completion of the NWP in closing the gap between Willits and Eureka. The Willits Depot is presently the eastern terminus of the CWR, a heritage railroad that runs west to Fort Bragg that is also known as the Skunk Train. The Willits Depot also houses the Willits Chamber of Commerce Visitor Center. According to the NCRA Draft EIR, which evaluated freight rail service between Lombard in Napa County and Willits in Mendocino County, no direct or indirect impacts are anticipated by the resumption of railroad operations (NCRA 2009:3.3/37). Presumably the same would be true for repurposing the corridor for trail use given that the Willits Depot complex is located on the west side of the existing tracks between East Commercial Street and East Van Lane.



Source: Mendocino County Rail-with-Trail Corridor Plan 2012

**Figure D-6 Willits Depot in Early 1930s**

#### *MP 138.6-157 Tunnels and Bridges between Willits and Longvale*

A series of three tunnels and 11 bridges of potential historic significance are located within the rail corridor between Willits and Longvale (MP 138.6-157) along Outlet Creek in Mendocino County. This section of the railroad, from Willits north to Eureka, was completed in 1914. According to the Mendocino County RWT Corridor Plan (2012), which provided an analysis of general conditions along the rail corridor, the longest tunnel in this section is about 1,200 feet (MP 150.0). As major built elements of the railroad that were crucial to the operation of the line along the narrow confines of the Outlet Creek Canyon in the North Coast Ranges in Mendocino County, these tunnels and bridges may have engineering or architectural significance and may be contributing elements of a railroad corridor historic district.

#### **RTT Eel River Canyon Section**

#### *MP 159.9-189.5 Tunnels and Bridges between Longvale and Ramsey, Mendocino County*

A series of 14 tunnels and nine bridges of potential historic significance are located within the rail corridor between Longvale and Ramsey (Figure D-7; MP 159.9-189.5) alongside the Eel River in Mendocino County. This section of the railroad, from Willits north to Eureka, was completed in 1914. According to the Mendocino County RWT Corridor Plan (2012), which provided an analysis of general conditions along the rail corridor, the longest tunnel in this section is 656 feet. As major built elements of the railroad that were crucial to the operation of the line along the narrow confines of the main fork of the Eel River in the North Coast





Source: SunnyFortuna.com  
([https://sunnyfortuna.com/railroad/local\\_stations.htm](https://sunnyfortuna.com/railroad/local_stations.htm))

**Figure D-10 Fernbridge Depot**

*MP 268.6 Fernbridge, Fernbridge*

The Eel River bridge, known as Fernbridge (Figure D-11), was listed in the NRHP in 1987 and is automatically listed in the CRHR. The bridge is located at the intersection of Fernbridge Drive with SR 211 (MP 268.6) in the small community of Fernbridge. Completed in 1911, the “Queen of Bridges” has a total length of 2,408 feet and linked Ferndale and the Eel River Valley to Eureka. A reinforced concrete bridge, it was an outstanding engineering feat of its time and its 196-foot individual spans are still the longest, earth-filled spandrel arch spans in California. The bridge’s north approach from the community of Fernbridge is flanked by the Humboldt Creamery Association facility and a farm equipment business. The end of the north approach is approximately 80 feet from the former NWP tracks.



Source: Bridgehunter.com  
(<https://bridgehunter.com/ca/humboldt/40134/>)

**Figure D-11 Fernbridge**

*MP 265.5-266.5 Orchard and Buildings, Fortuna*

Two properties of potential historic significance are adjacent to the rail corridor within the City of Fortuna: the Clendenen Apple Orchards at 96 12th Street (Figure D-12; MP 265.5) and the Jasper House built in 1930 at 105 Main Street (MP 266.5). Clendenen’s has been producing cider from the apples since 1909 after purchasing an existing orchard in 1908, now between U.S. 101 and the rail corridor. Over 70 resources 45 years of age or older were tabulated as being potentially significant for the Draft Program EIR for the City’s General Plan Update (City of Fortuna 2010). One building listed in the NRHP in 1982, the Gunshaw-Mudgett House at 820 9th Street, and the Rohnerville Historic District, in southeast Fortuna, are distant from the rail corridor. The historic NWP Fortuna Depot (formerly at MP 266), built circa 1889, was moved in 1975 to 3 Park Street in Rohnert Park, 0.6 mile from the rail corridor to the northeast, and converted into a municipal museum (Fortuna Depot Museum).



Source: Clendenen’s Cider Works  
(<http://clendenensciderworks.com/about-us/>)

**Figure D-12 Clendenen’s Apple Cider Works in Fortuna**

*MP 270.8 Bank of Loleta, Loleta*

The Bank of Loleta at 358 Main Street (Figure D-13; MP 270.8) in Loleta was listed in the NRHP in 1985 and is listed in the CRHR. Designed in the Neo-Classical Revival style, which was popular for public buildings and financial institutions when the bank building was built in 1920, the building retains a high degree of integrity. It is located on the opposite and west side of Main Street from the rail corridor. With the exception of the Dickson & Dickson Store built in 1893 three doors north of the bank, the additional buildings on Loleta’s one-block commercial row,

which are also on the opposite side of Main Street from the rail corridor, were also built circa the 1920s but have not been formally evaluated for NRHP or CRHR listing. The site of the Loleta Depot, which is no longer present, is within the linear park adjacent to the rail corridor, between Main Street and Railroad Avenue.



Source: Noehill.com (<https://noehill.com/humboldt/nat1985000354.asp>)

**Figure D-13 Bank of Loleta on Main Street**

*MP 277.6 Boat Yard and Community Church, Fields Landing*

The buildings and structures within the Fields Landing Boat Yard at 1 Yard Road, located approximately 100 feet west of the rail corridor on the spur line (MP 277.6) in Fields Landing, have been recommended not eligible for NRHP or CRHR listing (County of Humboldt 2019a). The public boat yard is owned and operated by the Humboldt Bay Harbor, Recreation and Conservation District. While the Calvary Community Church, which is located at the corner of Depot Road and Fields Landing Drive approximately 700 feet east of the rail corridor (MP 277.6), has been an entity in Fields Landing since the 1870s, the church has been recommended not eligible for NRHP or CRHR listing (County of Humboldt 2019a).

*MP 284.3-290.8 NWP Tracks, Eureka to Arcata*

The Timber Heritage Association (THA) operates special speeder crew car rides on the former NWP tracks within the rail corridor from 1st and E Streets in Old Town Eureka, paralleling Waterfront Drive, across the Eureka Slough Bridge, and back (MP 284.3-286) (THA 2019). Between Eureka Slough in Eureka and Bayside in Arcata, an approximately 5-mile section of the railroad (MP 285.4-290.8), the former NWP tracks have been previously found

ineligible for NRHP, CRHR, or local listing, and do not have the potential to be a contributor to any larger linear historic property or historic district. The portion of the railway heading north from Eureka became known as the Trinidad Branch. Portions of this 5-mile rail section were assessed for two different projects: the Humboldt Bay Trail South Initial Study and Mitigated Negative Declaration (IS/MND), which evaluated a proposed linkage of two existing multi-use trails between the City of Arcata's Humboldt Bay Trail North with the City of Eureka's Waterfront Trail (County of Humboldt 2018a); and the Route 101 Highway Improvement Project that evaluated widening the highway between Eureka and Bayside in Arcata (JRP 2004).

*MP 287-287.8 Arcata Redwood Company, Eureka*

The former Arcata Redwood Company at 5151 U.S. 101 (MP 287-287.8) on the bay front at Brainard in Eureka has been previously found ineligible for NRHP, CRHR, or local listing. The industrial building, which is currently owned by California Redwood Company, is adjacent to the rail corridor. The property was assessed for the Humboldt Bay Trail South IS/MND, which evaluated a proposed linkage of two existing multi-use trails between the City of Eureka's Waterfront Trail and the City of Arcata's Humboldt Bay Trail North (County of Humboldt 2018a).

*MP 287-288.2 Row of Eucalyptus Trees, Eureka*

A single row of eucalyptus trees adjacent to and on the east side of the rail corridor on the bay front at Brainard (MP 287-288.2) in Eureka have been previously found ineligible for NRHP or CRHR listing, either alone or as part of a historic landscape. The tree row, which was planted circa 1915, presently separates the tracks from the western side of U.S. 101, serving as a windbreak and light screen. The tree row was assessed for the Route 101 Highway Improvement Project, which evaluated widening the highway between Eureka and Bayside in Arcata (JRP 2004), and updated in response to comments received on the Humboldt Bay Trail South IS/MND, which evaluated a proposed linkage of two existing multi-use trails between the City of Eureka's Waterfront Trail and the City of Arcata's Humboldt Bay Trail North (County of Humboldt 2018b; JRP 2018).



### *MP 289 Wiyot Village, Bracut*

The Wiyot village of plets-wok, recorded in Humboldt County as archaeological site CA-HUM-048, was mapped at Brainard's Point near the southeast corner of present-day Bracut Industrial Park (MP 289), in Bracut (formerly known as Brainard and later as Brainard Cut), adjacent to the west side of the rail corridor between Eureka and Arcata. The village was described in 1806 and 1913 as being located on the raised landform, which was subsequently leveled for use in local construction projects in the mid-20th century. No evidence of the site has been reported and, as stated in a report for the Route 101 Highway Improvement Project, which evaluated widening the highway between Eureka and Bayside in Arcata (JRP 2004), CA-HUM-048 is believed to have been destroyed during historic-era railroad and road construction projects.

### *MP 289-289.5 Bracut Industrial Park, Bracut*

The 35-acre Bracut Industrial Park is located at 4051 U.S. 101 in Bracut, adjacent to the west side of the rail corridor between Eureka and Arcata (MP 289-289.5). According to two prior studies, the industrial park has been previously found ineligible for NRHP or CRHR listing (County of Humboldt 2018a; JRP 2004).

## **RTT Carlotta, Samoa, and Korblex Branches**

### *RTT Carlotta Branch (MP 0-9)*

There do not appear to be any potentially significant cultural resources within the Carlotta Branch of the rail corridor between Alton and Carlotta (MP 0-9). The three-story Carlotta Hotel built in 1903-1904 on Central Avenue (MP 4.9) in Carlotta, which had been listed in the NRHP in 1978 and thus automatically listed in the CRHR, was destroyed in the mid-1990s due to an electrical fire. It is difficult to discern from Google Earth imagery whether the building at the site of the Alton Depot (Figure D-14; MP 0) at the corner of Old State Highway 101 and SR 36 retains any historic integrity.



Source: SunnyFortuna.com  
([https://sunnyfortuna.com/railroad/local\\_stations.htm](https://sunnyfortuna.com/railroad/local_stations.htm))

**Figure D-14 Alton Depot Circa 1955**

## **RTT Samoa Branch (MP 1-9.8)**

### *MP 6.7-9.2 Sensitive Archaeological Area, Samoa Peninsula*

There is a high possibility that Native American and historic-era archaeological resources may be present on the Samoa Peninsula. The peninsula has an approximately 2,000-year history of occupation by Wiyot peoples, specifically the central division of Wiki, and of lumber-processing and shipyard industries by the late 1800s. According to the Samoa Industrial Waterfront Preliminary Transportation Access Plan (HBHRCD 2013), five documented Wiyot archaeological sites are located within the freight rail and highway access improvement area between the Samoa Bridge and Fairhaven (MP 6.7-9.2).

### *MP 7-7.7 Samoa Historic District, Samoa*

The Samoa Historic District is bisected by the Samoa Branch of the rail corridor between MP 7 and MP 7.7. The district has been previously found eligible for NRHP and CRHR listing through survey evaluation for the Samoa Town Master Plan (County of Humboldt 2019b). Of 227 resources, a total of 194 buildings, sites, and landscape elements have been found eligible for NRHP and CRHR listing as contributing resources to the district. These buildings, sites, and landscape elements maintain the integrity of the town's collective importance as a historic, company-owned lumber mill town dating back to the 1890s. The buildings are of architectural styles that relate to the character of the neighborhood grouping in terms of scale, materials, proportion, or other factors. The site and landscape elements contribute to the overall significance of the town. Exceptional individual buildings include, but

are not limited to, the Samoa Cookhouse south of Vance Avenue, the Samoa Block (south of Vance Avenue, west of Cutten Street, north of Bayview Avenue), and the Hostelry. After changing owners many times, Samoa was purchased in 2001 by the Samoa Pacific Group, LLC, which plans to develop the town but keep its historic nature.

#### *MP 7.2 Samoa Railroad Shop Complex, Samoa Branch*

The THA leases and manages tours of the Samoa Railroad Shop Complex ("Samoa Shops") at MP 7.2 in Samoa. The complex includes an intact roundhouse, plus a machine shop, blacksmith shop, boiler shop, tin shop, and car shop that were built beginning in 1893 by the former Hammond Lumber Company. The complex is located between the rail corridor and the Samoa Cookhouse, one of the exceptional buildings contributing to the Samoa Historic District. The THA operates a 4-mile round trip speeder crew car ride on the NWP tracks from Samoa north to Manila, and is working to develop a Humboldt Bay excursion train, plus a heritage and rail museum (THA 2019). Presumably the Samoa Railroad Shop Complex was evaluated as a contributing resource to the Samoa Historic District.

#### *MP 8.2 USS Milwaukee Memorial, Samoa*

A memorial to the USS Milwaukee was designated a California Point of Historical Interest in 1978. The memorial is on LP Drive, approximately 300 feet west of the rail corridor at MP 8.2. In accordance with the Samoa Town Master Plan, LP Drive will be renamed Samoa Pulp Lane (County of Humboldt 2019b).

#### **RTT Korblex Branch (MP 295.57-302)**

##### *MP 296.9-299.1 Mad River Bridge and Wooden Trestles, between Korblex and Blue Lake*

The Mad River Bridge and four large, freestanding wooden trestles within the Arcata & Mad River Railroad (A&MR) rail corridor between Korblex and Blue Lake (Figure D-15; MP 296.9-299.1) in Humboldt County are of potential historic significance. The A&MR was founded in 1854, serving as a link between Humboldt Bay and the Trinity River mines, and is California's first operating railroad. By the 1890s, the line was extended from Arcata along the Mad River to Glendale, Blue Lake,

and Korblex, and was linked to the NWP in 1914. Around 1900, the line came to be known as the "Annie and Mary Railroad." In late 1997, the rail and ties were removed for salvage.

Between Korblex and Glendale, the Warren Creek trestle, largest of all extant trestles on the A&MR rail corridor, crosses Warren Creek Road and Warren Creek at MP 297. The Schoolhouse trestle and Green Tank trestle are located between MP 297 and the Mad River Bridge at MP 298. The 620-foot long Mad River Bridge (MP 298) is a three-span, steel truss superstructure supported by concrete footings and wooden approach trestles, on which the Humboldt Bay Municipal Water District maintains a pipeline. The fourth trestle, the Minor Creek trestle, is adjacent to Glendale Drive in Glendale (MP 299). A fifth trestle, over Mill Creek in Glendale, is no longer standing.

The A&MR is a California Historical Landmark (CHL No. 842), designated in 1970. As noted in the Annie & Mary Rail-Trail Feasibility Study (RCAA 2003), the trestles are considered by the public to be important historic elements of the region and are indeed some of the last wooden trestles left in the region. The Mad River Bridge (Figure D-16) and the trestles are major built elements of the railroad that were crucial to the operation of the rail line along the A&MR corridor in Humboldt County. The bridge and trestles may thus have engineering or architectural significance and may be contributing elements of a railroad corridor historic district.



Source: RCAA 2003

**Figure D-15      Wooden Trestle Along the Annie & Mary Railroad Corridor**





Source: RCAA 2003

**Figure D-16 Annie & Mary Railroad Mad River Bridge**

*MP 298 Arcata & Mad River Railroad Rail Yard, Glendale*

A historic 1-acre A&MR rail yard is adjacent to the rail corridor on the north side of the Mad River (MP 298) in Glendale. The yard, which is full of equipment representing the lifetime operations of the railroad (Figure D-17), is managed by the Northern Counties Logging Interpretive Association. According to the Annie & Mary Rail-Trail Feasibility Study (RCAA 2003:18), the Association's goal is to create a museum for historic logging and railroad equipment and to restore passenger rail for tourism. While the rail yard has not been previously evaluated for NRHP, CRHR, or local listing, either individually or as a contributing element to a railroad corridor historic district and may or may not reach the statutory level of significance, it would nonetheless make an excellent interpretive and visitor facility.



Source: RCAA 2003

**Figure D-17 Train Equipment in Glendale Rail Yard**

*MP 300.8 Arcata and Mad River Railroad Depot, Blue Lake*

The A&MR Railroad Depot at 330 Railroad Ave (Figure D-18; MP 300.8) in downtown Blue Lake is the site of the plaque designating the railroad as a California Historical Landmark (CHL No. 842). The Depot, built in 1893 is located adjacent to the rail

corridor. The 1970 landmark plaque is located on a boulder adjacent to the Depot's parking area within the linear park northwest of the building between Railroad Avenue and South Railroad Avenue. The A&MR Depot presently houses the Blue Lake Museum (Figure D-19), which was opened in 1982 by the Blue Lake Museum Society in 1982. The exterior of the building is presently painted a pale blue.



Source: RCAA 2003

**Figure D-18 Arcata & Mad River Depot Circa 1900**



Source: RCAA 2003

**Figure D-19 Arcata & Mad River Depot That Now Houses Blue Lake Museum**

*MP 300.8-301 Downtown Historic District, Blue Lake*

The City of Blue Lake contains over 60 historic buildings that may contribute to a potential downtown historic district. Examples of the properties adjacent to the rail corridor (MP 300.8-301) that may contribute to a downtown historic district include the A&MR Depot built in 1893 at 330 Railroad Avenue (MP 300.8) that presently houses the Blue Lake Museum; the Logger Bar at 510 Railroad Avenue (MP 300.9), built circa 1889; the Mad River Grange (No. 590) established in 1900 at 110 Hatchery Road (MP 300.9) just west of the Logger Bar; and the Blue Lake Emporium built circa

1871 on H Street (MP 300.9) opposite the Mad River Grange. The rail corridor runs between the historic Grange and Logger Bar buildings and between the Blue Lake Emporium and the building with the iconic “Blue Lake Downtown 1910” mural at 410 South Railroad Avenue (Figure D-20; MP 300.85) south of the Depot. The Skinner Store, built in 1894 as a creamery, has been restored and is located off the east side of South Railroad Avenue (MP 300.7) behind the modern Blue Lake City Hall at 111 Greenwood Avenue. A tavern building, built in 1912 at 120 H Street at the Railroad Avenue intersection (MP 300.9), presently houses the Chumayo Spa. The Independent Order of Odd Fellows Hall at 131 H Street (one block east of the rail corridor at MP 300.9), built in 1912, houses the International School of Physical Theatre, one of the longest-running theatrical ensembles in the U.S. While no record was found of these buildings having been previously evaluated for listing in the NRHP, CRHR, or any local register, either individually or as contributors to a downtown Blue Lake historic district, according to the Annie & Mary Rail-Trail Feasibility Study (RCAA 2003), these buildings and the public mural are valued as locally significant historic resources by the residents of the City of Blue Lake.



Source: RCAA 2003

Figure D-20 Mural on Historic Building at  
410 South Railroad Avenue in Blue Lake



Table D-1 Potentially Significant Historic and Archaeological Resources Within or Adjacent to the Rail Corridor

| Name                                                  | Milepost                          | Summary                                                                                                                                                                                                                       |
|-------------------------------------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>RWT Southern Section</b>                           |                                   |                                                                                                                                                                                                                               |
| Oliveto Winery                                        | 68.9                              | Located adjacent to the rail corridor. Was previously found eligible for NRHP listing as an individual property through survey evaluation.                                                                                    |
| Nervo Winery                                          | 73.7                              | Located adjacent to the rail corridor. Was previously found eligible for NRHP listing as an individual property through survey evaluation.                                                                                    |
| Italian Swiss Colony                                  | 78.8, 80.5-81.5                   | Located adjacent to rail corridor. It has been designated as a California Historical Landmark (CHL No. 621).                                                                                                                  |
| Redwood Empire Mill                                   | 81.7-82.3                         | Located adjacent to the rail corridor. Was previously found eligible for CRHR listing as an individual property through survey evaluation.                                                                                    |
| <b>RTT Southern Section</b>                           |                                   |                                                                                                                                                                                                                               |
| Tunnels: Cloverdale to Pieta                          | 85.4, 87.4-87.8, 88.8, 93.7, 94.5 | A series of five tunnels of potential historic significance are located within the rail corridor.                                                                                                                             |
| From Woman Rock                                       | 93.7                              | A distinctive volcanic monolith located within the rail corridor. It has been designated as a California Historical Landmark (CHL No. 549).                                                                                   |
| Thatcher Hotel                                        | 99.7                              | Located adjacent to the rail corridor. Was previously found eligible for NRHP listing as an individual property through survey evaluation. It is also a contributor to a historic district determined and listed in the CRHR. |
| Holz Company Store                                    | 113.5                             | Located adjacent to the rail corridor. Was previously found eligible for NRHP listing as an individual property through survey evaluation.                                                                                    |
| NWP Depot                                             | 113.7                             | Located adjacent to the rail corridor. Was previously found eligible for NRHP listing as an individual property through survey evaluation.                                                                                    |
| Wooden Trestle                                        | 114.1                             | Located within the rail corridor. It may have local significance and may be a contributing element of a railroad corridor historic district.                                                                                  |
| Holman Beatty/Briggs Brickyard/Empire Milling Company | 114.3                             | Located adjacent to the rail corridor. The building was evaluated by the City of Ukiah in 1999 and is considered locally significant. The building may be individually eligible for listing in the NRHP.                      |
| Bridges: Ukiah to Calpella                            | 115.9, 116.4, 117.6, 119, 120.5   | A series of five bridges on the Ukiah Mainline of potential historic significance are located within the rail corridor.                                                                                                       |
| Sensitive Archaeological Areas                        | 117.3-119.3                       | Sensitive archaeological areas are potentially present along the Russian River adjacent to the rail corridor north of Ukiah, between The Forks and Calpella.                                                                  |
| Sensitive Archaeological Areas                        | 137.9, 138.6, 139, 139.4          | Sensitive archaeological areas are potentially present near corridor stream crossings in the vicinity of Willits.                                                                                                             |
| California Western Railroad                           | 138.5-139.1                       | Runs parallel to the rail corridor. It has been previously found eligible for NRHP listing as an individual property by consensus through the Section 106 process and is also listed in the CRHR.                             |
| Willits Depot                                         | 139.1                             | Located adjacent to the rail corridor. It was listed in the NRHP in 1999 and is listed in the CRHR.                                                                                                                           |
| Tunnels & Bridges: Willits to Longvale                | 138.6-157                         | A series of three tunnels and 11 bridges of potential historic significance are located within the rail corridor.                                                                                                             |

| Name                                                     | Milepost    | Summary                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>RTT Eel River Canyon Section</b>                      |             |                                                                                                                                                                                                                                                                                                                                                   |
| Tunnels & Bridges: Longvale to Ramsey                    | 159.5-189.5 | A series of 14 tunnels and nine bridges of potential historic significance are located within the rail corridor.                                                                                                                                                                                                                                  |
| Tunnels & Bridges: Ramsey to South Fork                  | 194.4-233.9 | A series of eight tunnels and three bridges of potential historic significance are located within the rail corridor.                                                                                                                                                                                                                              |
| <b>RTT Northern Section</b>                              |             |                                                                                                                                                                                                                                                                                                                                                   |
| Tunnels & Bridges: South Fork to Loleta                  | 237.6-271.8 | Three tunnels and one bridge of potential historic significance are located within the rail corridor.                                                                                                                                                                                                                                             |
| Scotia Historic District                                 | 253.7-256   | The town of Scotia was identified as a potential historic district, eligible for listing in the NRHP and CRHR, in a 2007 historic resources report prepared for Pacific Lumber Company. The boundaries of the potential historic district are along the east side of the Eel River and encompass the railroad mainline, spurs, and rail corridor. |
| Sensitive Archaeological Areas                           | 262-268.6   | Sensitive archaeological areas are potentially present along the rail corridor in the Eel River Valley between Alton and Fernbridge.                                                                                                                                                                                                              |
| Fernbridge Depot                                         | 268.5       | Located adjacent to the rail corridor. It has not been evaluated but may be individually eligible for listing in the NRHP and CRHR.                                                                                                                                                                                                               |
| Clendenen Orchard & Jasper House                         | 265.5-266.5 | Located adjacent to the rail corridor. Each are of potential historic significance.                                                                                                                                                                                                                                                               |
| Bank of Loleta                                           | 270.8       | Located adjacent to the rail corridor. Was listed in the NRHP in 1985 and is listed in the CRHR.                                                                                                                                                                                                                                                  |
| <b>Carlotta, Samoa, and Korblex Branches</b>             |             |                                                                                                                                                                                                                                                                                                                                                   |
| Sensitive Archaeological Areas (Samoa Branch)            | 6.7-9.2     | Sensitive archaeological areas are potentially present along the rail corridor on the Samoa Peninsula.                                                                                                                                                                                                                                            |
| Samoa Historic District                                  | 7-7.7       | The Samoa Historic District is bisected by the Samoa Branch of the rail corridor. It has been previously found eligible for NRHP and CRHR listing through survey evaluation for the Samoa Town Master Plan.                                                                                                                                       |
| Mad River Bridge & Wooden Trestles: Korblex to Blue Lake | 297-299     | The Mad River Bridge and four large, freestanding wooden trestles within the rail corridor are of potential historic significance.                                                                                                                                                                                                                |
| Arcata & Mad River Railroad Yard (Korblex Branch)        | 298         | Located adjacent to the rail corridor. It has not been evaluated but is of potential historic significance.                                                                                                                                                                                                                                       |
| Arcata & Mad River Railroad Depot (Korblex Branch)       | 300.8       | Located adjacent to the rail corridor. It is the site of the plaque designating the railroad as a California Historical Landmark (CHL No. 842).                                                                                                                                                                                                   |
| Downtown Historic District (Korblex Branch)              | 300.8-301   | Located adjacent to the rail corridor. Includes over 60 historic buildings that may contribute to a potential downtown historic district. It has not been evaluated; however, according to the Annie & Mary Rail-Trail Feasibility Study, components are valued as locally significant historic resources by the City of Blue Lake.               |

Notes: CHL = California Historic Landmark; CRHR = California Register of Historical Resources; No. = Number; NRHP = National Register of Historic Places; NWP = Northwestern Pacific Railroad; RTT = Rail to Trail; RWT = Rail with Trail. There were no potentially significant historic or archaeological resources identified within the Carlotta Branch of the rail corridor.  
Source: NIC 2020; Ascent Environmental 2020



## Exhibit M – Potential Hazardous Waste sites

**Summary of Potential Waste Sites for Underground Characterization**  
**Willits North**  
**By**  
**NCRA Engineer, Dave Anderson, P.E.**  
**September 2020**

| Yard Site       | MP    | Latitude   | Longitude    | TCRP Surface Clean-up | Candidate for Subsurface Investigation | Suspected Hazardous Material | Notes based on Kleinfelder's NCRA hazardous waste studies and discussions with Bradley Erskine (Kleinfelder Project Manager)                                                                                                                                               |
|-----------------|-------|------------|--------------|-----------------------|----------------------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Willits         | 139.8 | 39.417548° | -123.351146° | yes                   | yes                                    | Hydrocarbon's Voc's          | 200 yds of petroleum contaminated soil removed during cleanup, Locomotive maintenance area adjacent to the contaminated soil pile that was removed. Two former above ground storage tank locations identified. Areas of heavy oil staining in area of equipment servicing. |
| Dos Rios        | 166.5 | 39.717270° | -123.352686° | Yes                   |                                        |                              | No above ground storage tanks, storage of rail cars, storage of maintenance equipment and materials.                                                                                                                                                                       |
| Nashmead        | 175.5 | 39.824207° | -123.416593° | Yes                   |                                        |                              | No evidence of locomotive maintenance. 2005 aerial photo shows bermed fuel tank and stored secondhand railroad steel bridge span.                                                                                                                                          |
| Island Mountain | 194.5 | 40.027147° | -123.491389° | Yes                   | yes                                    | Hydrocarbon's VOC's          | Maintenance Yard, above ground riveted storage tanks (diesel & oil), areas of heavy oil staining, waste storage boxcars, rail and tie storage, two vacant houses.                                                                                                          |
| Alderpoint      | 209   | 40.178384° | -123.609735° | Yes                   | yes                                    | Hydrocarbon's                | Above ground storage tanks with visible ground staining. Hazardous waste storage boxcar. Spur track with heavy oil staining.                                                                                                                                               |
| Fort Seward     | 216.5 | 40.222530° | -123.641939° | Yes                   | yes                                    | Hydrocarbon's                | Hazardous waste storage boxcar, rail and tie storage, cook house, crew overnight stays.                                                                                                                                                                                    |
| South Fork      | 237.2 | 40.344362° | -123.916164° | Yes                   | yes                                    | Hydrocarbon's                | 1000 gal diesel & 500 gal gas above round storage tanks.                                                                                                                                                                                                                   |
| Scotia          | 255.5 | 40.484789° | -124.105229° | Yes                   | yes                                    | Hydrocarbon's VOC's          | Hazardous waste storage boxcars. 500gal oil tank, soil stockpile with drums containing contaminated soil. Spill recorded at this site. Documented past remediation activities. Existing soil stockpile believed to be contaminated.                                        |
| Eureka          | 284   | 40.803956° | -124.173176° | Yes                   | Yes                                    | Hydrocarbons                 | Boxcar used to store hazardous materials. Heavy oil staining in areas of locomotive and other maintenance equipment.                                                                                                                                                       |



| Hazardous Material Site                 | Type & Cleanup Status                                                | Location Relative to Rail Corridor                     | Contaminants of Concern                                                   | Notes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------|----------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Southern Pacific Redwood Valley Station | Cleanup Program Site<br>Open: Inactive as of 5/28/2009               | Within/immediately adjacent, near MP 122               | Diesel<br>Potential concerns under investigation                          | As of May 2019, the Regional Water Board anticipated they would evaluate the site for the need for additional remediation work and draft an environmental covenant during fiscal year 2019/2020.                                                                                                                                                                                                                                                                                                                                             |
| Union Oil                               | DTSC Historical<br>Refer to the Regional Water Board as of 7/27/1988 | Within/immediately adjacent, near MP 139               | N/A                                                                       | The site was identified during a drive by and screening was completed in 1988. No additional information is available through GeoTracker.                                                                                                                                                                                                                                                                                                                                                                                                    |
| Little Lake Industries                  | LUST Cleanup Site<br>Completed: Case Closed as of 9/22/1997          | Within/immediately adjacent, between MP 139 and MP 140 | Solvents<br>Potential contamination of an aquifer used for drinking water | Remediation and verification monitoring activities occurred in 1997 and the case was closed shortly thereafter.                                                                                                                                                                                                                                                                                                                                                                                                                              |
| NCRA Willits Rail Yard                  | Cleanup Program Site<br>Open: Site Assessment as of 12/27/1991       | Within/immediately adjacent, between MP 139 and MP 140 | Diesel<br>Potential concerns under investigation                          | As of May 2019, the Regional Water Board anticipated they would evaluate the site status, prepare a deed restriction and closure documentation, and bring the case through the closure process during fiscal year 2019/2020.                                                                                                                                                                                                                                                                                                                 |
| <b>RTT Eel River Canyon Section</b>     |                                                                      |                                                        |                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Dos Rios Rail Yard                      | N/A                                                                  | Within/immediately adjacent, between MP 166 and MP 167 | N/A                                                                       | As of 2002, the Dos Rios maintenance yard contained oil and grease waste, a diesel storage tank, and lead-acid batteries. Heavy surface staining was noted between rails of the side rail, and there was a large pile of disposed rail ties (Kleinfelder 2002). Cleanup activities were conducted at the Dos Rios maintenance yard in 2004 (Kleinfelder 2005). No rail-related waste or other debris were identified by PWA during field assessment in early 2020 at this location.                                                          |
| Nashmead Maintenance Yard               | N/A                                                                  | Within/immediately adjacent, between MP 175 and MP 176 | N/A                                                                       | According to a Consent Decree and Stipulated Judgment (California v. NCRA, Case No. CV80240, July 1999), at one point there was a railroad car in the streambed of the Eel River at MP 175 (Kleinfelder 2002), which is near the Nashmead maintenance yard. As of 2002, it was suspected that petroleum storage facilities had been removed, but that ties were buried (Kleinfelder 2002). PWA noted the presence of railroad infrastructure, rail metal debris, and railroad cars in this area during their field assessment in early 2020. |
| Bell Springs Maintenance Yard           | N/A                                                                  | Within/immediately adjacent, near MP 185               | N/A                                                                       | Previously-documented petroleum storage, oil spills, and rail ties, as well as an underground fuel tank (Kleinfelder 2002). PWA noted the presence of a rail car in the Eel River and rail debris near this location during their field assessment in early 2020.                                                                                                                                                                                                                                                                            |
| Island Mountain Maintenance Yard        | N/A                                                                  | Within/immediately adjacent, near MP 194               | N/A                                                                       | This maintenance yard was noted in the 1999 Consent Decree and Stipulated Judgment as having contaminated equipment; the consent decree required additional sampling and investigation as well as                                                                                                                                                                                                                                                                                                                                            |

| Hazardous Material Site              | Type & Cleanup Status                                                 | Location Relative to Rail Corridor       | Contaminants of Concern                                                                                              | Notes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------|-----------------------------------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                       |                                          |                                                                                                                      | preparation of a remediation plan. As of 2002, the site contained drums and containers with petroleum waste and product within boxcars. There are also storage tanks and drums that were empty but suspected to have previously held petroleum, oil, and fuel. Surface staining was noted, and discarded rail ties were present (Kleinfelder 2002). Aerial imagery in this location shows multiple parallel tracks with 10 rail cars and various structures.<br>PWA noted the presence of rail cars, track switches, and other rail-related debris near this location during their field assessment in early 2020. |
| Alderpoint Maintenance Yard          | Cleanup Program Site<br>Open: Inactive as of 2/27/1992                | Within/immediately adjacent, near MP 209 | Diesel<br>Potential contamination is under investigation                                                             | Per correspondence from December 2015, the Regional Water Board expected to review the soil and groundwater investigation workplan and associated reports and conduct site inspections.                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Fort Seward Maintenance Yard         | N/A                                                                   | Within/immediately adjacent, near MP 216 | N/A                                                                                                                  | As of 2002, the Fort Seward Maintenance Yard contains many drums and buckets in a boxcar, with some containing grease and oil. Oil surface staining was noted (Kleinfelder 2002). Cleanup activities were conducted at the Fort Seward Maintenance Yard in 2004 (Kleinfelder 2005).<br>No rail related waste or other debris were identified by PWA during their site visit in early 2020 at this location.                                                                                                                                                                                                        |
| <b>RTT Northern Section</b>          |                                                                       |                                          |                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| South Fork Maintenance Yard/ Station | LUST Cleanup Site<br>Open: Site Assessment as of 9/25/2018            | Within/immediately adjacent, near MP 237 | Diesel<br>Potential contamination of an aquifer used for drinking water                                              | Per correspondence from September 2019, UPRR is working on a subsurface investigation work plan to determine if groundwater has been impacted by the LUST.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Scotia Maintenance Yard              | N/A                                                                   | Within/immediately adjacent, near MP 253 | N/A                                                                                                                  | As of 2002, the Scotia Maintenance Yard in Scotia was used for storage of oil supply and waste products, and an aboveground storage tank was present. Rail ties were stored in the area, and an oil deposit was noted in the side rail tracks (Kleinfelder 2002). Cleanup activities were conducted at the Scotia Maintenance Yard in 2004 (Kleinfelder 2005).<br>No rail-related waste or other debris were identified by PWA during their field assessment in early 2020 at this location.                                                                                                                       |
| Eel River Sawmills                   | Cleanup Program Site<br>Open: Verification Monitoring as of 6/22/2017 | Within/immediately adjacent, near MP 259 | Diesel, gasoline, pesticides, fumigants, waste oils<br>Potential contamination of an aquifer used for drinking water | The site is jointly led by the Regional Water Board with the DTSC. All but one of the major mill buildings were removed between 2007 and 2008. The City of Rio Dell has standby wells adjacent to the site. Per correspondence from October 2016, the Regional Water Board expected to conduct site inspections, review monitoring reports, and review any plans needed to complete investigation of the extent of groundwater contamination in fiscal year 2016/2017.                                                                                                                                             |



| <b>Hazardous Material Site</b>                   | <b>Type &amp; Cleanup Status</b>                                                    | <b>Location Relative to Rail Corridor</b>              | <b>Contaminants of Concern</b>                                                                                                  | <b>Notes</b>                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pacific Lumber Company Fortuna Mill              | Cleanup Program Site<br>Open: Assessment & Interim Remedial Action as of 6/22/2017  | Within/immediately adjacent, near MP 265               | Diesel, dioxin/furans, gasoline, waste oils<br>Potential contamination of soil and an aquifer used for drinking water           | Per correspondence from February 2020, the Regional Water Board requested that the entire parcel be included in the Land Use Covenant, not just the areas of residual contamination, prior to site closure.                                                                                                                                                                               |
| Unocal Bulk Plant                                | Cleanup Program Site<br>Open: Assessment & Interim Remedial Action as of 12/29/2010 | Within/immediately adjacent, between MP 266 and MP 267 | Gasoline<br>Potential contamination of an aquifer used for drinking water                                                       | Per correspondence from May 2019, the Regional Water Board anticipated they would review and comment on draft environmental covenant agreements and facilitate the institution of the land use covenant in fiscal year 2019/2020.                                                                                                                                                         |
| Eureka Former Fuel Pipeline                      | Cleanup Program Site<br>Open: Inactive as of 6/13/2017                              | Within/immediately adjacent, near MP 283               | Heating oil, fuel oil<br>Potential contamination of soil and an aquifer used for drinking water                                 | Per correspondence from May 2019, the Regional Water Board anticipated they would evaluate the site status and conduct site inspections/evaluate the site for closure in fiscal year 2019/2020.                                                                                                                                                                                           |
| NWP Railroad Yard                                | Cleanup Program Site<br>Open: Inactive as of 2/10/1998                              | Within/immediately adjacent, near MP 284               | Under investigation                                                                                                             | The GeoTracker case summary indicates that there was a leak discovered and reported in 1998 and there are potential stormwater issues.                                                                                                                                                                                                                                                    |
| R.E. Davenport                                   | DTSC Historical<br>Refer to the Regional Water Board as of 1/3/1994                 | 0.02 mile north of Rail Corridor, near MP 284          | Waste oil, mixed oil                                                                                                            | The bankrupt owner was unable to cleanup 150 bulging and leaking drums of bilge oil from boats. Emergency response was undertaken at the waterfront site and the Regional Water Board funded part of the cleanup. Since the site is only oil contaminated, it was referred to the Regional Water Board (no information available through GeoTracker).                                     |
| Southern Pacific – Waterfront/G & R Metal        | Cleanup Program Site<br>Open: Verification Monitoring as of 6/14/2017               | Within/immediately adjacent, between MP 284 and MP 285 | Gasoline, arsenic, chromium, copper, lead, nickel, PCBs, waste oils<br>Potential contamination of surface water and groundwater | The GeoTracker case summary for Southern Pacific – Waterfront indicates that the case was combined with G&R Metals in 2002. Per correspondence from May 2019, the Regional Water Board anticipated they would review site closure documents, prepare a site closure summary, develop site closure documents for public notice, and prepare the deed restriction in fiscal year 2019/2020. |
| Beaver Lumber Company of Arcata                  | Cleanup Program Site<br>Completed: Case Closed as of 1/3/2007                       | Within/immediately adjacent, near MP 292               | Pesticides, fumigants, solvent, distillates<br>Potential contamination of an aquifer used for drinking water                    | A No Further Action Letter was issued on January 2, 2007 by the Regional Water Board confirming that site investigation and remedial action is complete.                                                                                                                                                                                                                                  |
| <b>RTT Carlotta, Samoa, and Korblex Branches</b> |                                                                                     |                                                        |                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                           |
| Samoa Peninsula                                  | Cleanup Program Site<br>Open: Inactive as of 6/14/2017<br>Land Use Restrictions     | Immediately adjacent to Samoa Branch                   | Aviation<br>Potential contamination of an aquifer used for drinking water                                                       | Per an Annual Estimation Letter from May 2019, the Regional Water Board anticipated they would review reports needed to complete investigation of the vertical and horizontal extent of contamination and conduct site inspections in fiscal year 2019/2020.                                                                                                                              |

| Hazardous Material Site            | Type & Cleanup Status                                                             | Location Relative to Rail Corridor     | Contaminants of Concern                                                                                   | Notes                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Former Evergreen Pulp Incorporated | Cleanup Program Site<br>Open: Assessment & Interim Remedial Action as of 3/6/2016 | Immediately adjacent to Samoa Branch   | Gasoline, metals, solvents<br>Potential contamination of soil and aquifer used for drinking water         | In September 2014, EPA completed the removal of spent pulping liquors that were previously stored in multiple onsite aboveground storage tanks. Per an Annual Estimation Letter from May 2019, the Regional Water Board expects to conduct site inspections and review monitoring reports and remedial action plans in fiscal year 2019/2020.                          |
| McNamara and Peepe Lumber Mill     | DTSC Site Cleanup Program<br>Active as of 1/2/2019 Land Use Restrictions          | Immediately adjacent to Korblex Branch | 2,3,4,6-TCP, PCP, waste potentially containing dioxins<br>Potential contamination of soil and groundwater | Land use restrictions are in place and notification prior to a change in land use or subsurface work is required.                                                                                                                                                                                                                                                      |
| McNord Lumber Company              | DTSC Site Cleanup Program<br>Active as of 11/21/2019                              | Immediately adjacent to Korblex Branch | 2,3,4,6-TCP, PCP<br>Potential contamination of sediments and soil                                         | McNord Lumber Company operated a lumber mill from at least 1961 through 1974. Mill operations included the dipping of wood products in a fungicide and PCP, and allowing them drip dry. Blue Lake Forest Products currently operates a lumber and trailer storage facility. A dip tank, using Britewood S dip solutions, is located on the north side of the property. |

Notes: CEQA = California Environmental Quality Act; DTSC = Department of Toxic Substances Control, ELT = Environmental Liability Transfer, Inc., EPA = U.S. Environmental Protection Agency, LUST = leaking underground storage tank, MP = Milepost, N/A = Not Available, NCRA = North Coast Railroad Authority, NWP = Northwestern Pacific Railroad, PAHs = polynuclear aromatic hydrocarbons, PCB = polychlorinated biphenyls, PCE = perchloroethylene, PCPs = pentachlorophenol, PWA = Pacific Watershed Associates, RAP = remedial action plan, Regional Water Board = Regional Water Quality Control Board, RTT = Rail to Trail, RWT = Rail with Trail, TCP = tetrachlorophenol, TPH = total petroleum hydrocarbons, UPRR = Union Pacific Railroad.  
Source: DTSC 2019, 2020; Kleinfelder 2002, 2005; PWA 2020; SWRCB 2019, 2020.



Table C-7 Abandoned Rail Equipment, Structures, and Rail Debris within the Rail Corridor

| Description                                                                 | MP Location | Segment |
|-----------------------------------------------------------------------------|-------------|---------|
| <b>RWT Southern Section</b>                                                 |             |         |
| No rail debris was found in this section                                    | NA          | NA      |
| <b>RTT Southern Section</b>                                                 |             |         |
| Multiple rail cars and miscellaneous railroad items, Skunk Train/Depot area | 139.4       | 19      |
| Multiple rail cars on east tracks                                           | 139.6       | 19      |
| Multiple rail cars on west tracks                                           | 139.7       | 19      |
| Multiple rail car axles on west tracks                                      | 139.9       | 19      |
| Multiple overturned rail cars on outboard fillslope of railroad track bench | 151.6       | 21      |
| <b>RTT Eel River Canyon Section</b>                                         |             |         |
| Overturned rail car to west of tracks                                       | 152.7       | 22      |
| Railroad infrastructure                                                     | 166.5       | 24      |
| Crane - Rail metal debris                                                   | 166.5       | 24      |
| Railroad cars                                                               | 166.5       | 24      |
| Railroad cars                                                               | 166.5       | 24      |
| Rail metal debris chassis                                                   | 166.5       | 24      |
| Rail metal debris                                                           | 166.5       | 24      |
| Rail metal debris                                                           | 166.5       | 24      |
| Rail metal debris                                                           | 166.6       | 24      |
| Railroad debris                                                             | 166.6       | 24      |
| Old railroad infrastructure                                                 | 166.6       | 24      |
| Old track switch                                                            | 166.7       | 24      |
| Old railroad infrastructure                                                 | 166.7       | 24      |
| Rail car                                                                    | 166.8       | 24      |
| Rail debris                                                                 | 168.5       | 24      |
| Rail debris                                                                 | 170.6       | 24      |
| Rail debris                                                                 | 170.6       | 24      |
| Concrete tunnel portal failed and slide into river                          | 171.8       | 25      |
| Rail waste from rail removal                                                | 173.6       | 25      |
| Rail car in middle of river                                                 | 174.1       | 25      |
| Rail debris (potential old culvert)                                         | 174.3       | 25      |
| Grease box                                                                  | 176.4       | 25      |
| Rail debris                                                                 | 177.6       | 25      |

## Appendix C

| Description                            | MP Location | Segment |
|----------------------------------------|-------------|---------|
| Rail debris                            | 177.8       | 25      |
| Rail waste                             | 179.2       | 26      |
| Track switch #17                       | 180.0       | 26      |
| Rail car                               | 180.1       | 26      |
| Rail car/debris                        | 180.1       | 26      |
| Rail car/metal waste                   | 180.5       | 26      |
| Rail car/metal waste                   | 180.5       | 26      |
| Rail car/metal waste                   | 180.5       | 26      |
| Rail car/metal waste                   | 180.5       | 26      |
| Rail car/metal waste                   | 180.5       | 26      |
| Grease box                             | 181.9       | 26      |
| Crossing debris                        | 183.9       | 26      |
| Crossing debris                        | 183.9       | 26      |
| Rail car                               | 184.1       | 26      |
| Rail car                               | 184.1       | 26      |
| Rail car                               | 184.1       | 26      |
| Track switch number 818                | 184.2       | 26      |
| Rail car                               | 184.3       | 26      |
| Rail car                               | 184.3       | 26      |
| Track switch                           | 184.3       | 27      |
| Grease box                             | 185.2       | 27      |
| Grease box                             | 186.3       | 27      |
| Rail car                               | 187.1       | 27      |
| Culvert debris                         | 187.5       | 27      |
| Rail car                               | 188.0       | 27      |
| Grease box                             | 188.4       | 27      |
| Rail waste                             | 189.3       | 28      |
| Track switch                           | 190.0       | 28      |
| Track switch                           | 194.2       | 28      |
| Rail metal waste (old culverts, rails) | 194.4       | 28      |
| Rail waste                             | 194.4       | 28      |
| Trailer                                | 194.4       | 28      |
| Rail car                               | 194.4       | 28      |



| Description                              | MP Location | Segment |
|------------------------------------------|-------------|---------|
| Rail car                                 | 194.4       | 28      |
| Excavator                                | 194.4       | 28      |
| Rail car                                 | 194.4       | 28      |
| Rail car                                 | 194.4       | 28      |
| Rail car                                 | 194.4       | 28      |
| Rail car                                 | 194.5       | 28      |
| Rail car                                 | 194.5       | 28      |
| Rail car                                 | 194.5       | 28      |
| Rail car                                 | 194.5       | 28      |
| Rail car                                 | 194.5       | 28      |
| Rail car                                 | 194.5       | 28      |
| Communication tower                      | 194.5       | 28      |
| Living quarters                          | 194.5       | 28      |
| Rail car (2)                             | 194.5       | 28      |
| Railroad building                        | 194.6       | 28      |
| Rail car                                 | 194.7       | 28      |
| Rail waste                               | 194.7       | 28      |
| Rail car                                 | 195.7       | 28      |
| Rail metal waste                         | 195.7       | 28      |
| Excavator                                | 196.2       | 28      |
| Rail metal waste (potential old culvert) | 196.2       | 28      |
| Rail metal waste                         | 196.3       | 28      |
| Rail car                                 | 196.9       | 28      |
| Potential old culvert                    | 197.2       | 28      |
| Old culvert                              | 197.7       | 28      |
| Potential old culvert                    | 199.3       | 28      |
| Flat rail car                            | 200.1       | 28      |
| Horse trailer                            | 200.2       | 28      |
| Potential old culverts                   | 200.7       | 28      |
| Old culvert                              | 200.8       | 28      |
| Old culvert                              | 201.2       | 28      |
| Grease box                               | 205.3       | 28      |
| Flat car                                 | 205.7       | 28      |

## Appendix C

| Description                               | MP Location | Segment |
|-------------------------------------------|-------------|---------|
| Rail car                                  | 205.7       | 28      |
| Rail waste                                | 207.9       | 29      |
| Rail car                                  | 208.9       | 29      |
| Metal waste                               | 209.0       | 29      |
| Metal waste                               | 209.0       | 29      |
| Old culvert                               | 212.1       | 29      |
| Old culvert                               | 212.2       | 29      |
| Old culvert                               | 212.3       | 29      |
| Rail waste                                | 216.4       | 30      |
| Rail waste                                | 216.4       | 30      |
| Rail car                                  | 216.4       | 30      |
| Grease box                                | 220.3       | 30      |
| Rail car                                  | 224.9       | 30      |
| Old culverts                              | 224.9       | 30      |
| Rail car                                  | 232.2       | 32      |
| <b>RTT Northern Section</b>               |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Korblex Branch</b>                 |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Carlotta Branch</b>                |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Samoa Branch</b>                   |             |         |
| No rail debris was found in this section. | NA          | NA      |

Notes: MP = Milepost; NA = Not Applicable; RTT = Rail to Trail; RWT = Rail with Trail  
Source: Compiled by Ascent Environmental in 2020.

Table C-8 Landslides and Slope Failures

| Segment                     | MP Location | Approximate Length (feet) | Description                                                           |
|-----------------------------|-------------|---------------------------|-----------------------------------------------------------------------|
| <b>RWT Southern Section</b> |             |                           |                                                                       |
| NA                          | NA          | NA                        | No landslides or slope failures have been documented in this section. |
| <b>RTT Southern Section</b> |             |                           |                                                                       |
| 8                           | 90.4        | 150                       | A downslope slide is undermining the tracks.                          |
| 8                           | 90.6        | 20                        | A downslope slide is undermining the tracks.                          |
| 8                           | 90.7        | 100                       | Area of soil creep and erosion.                                       |



## Exhibit N – Narrative History of Line

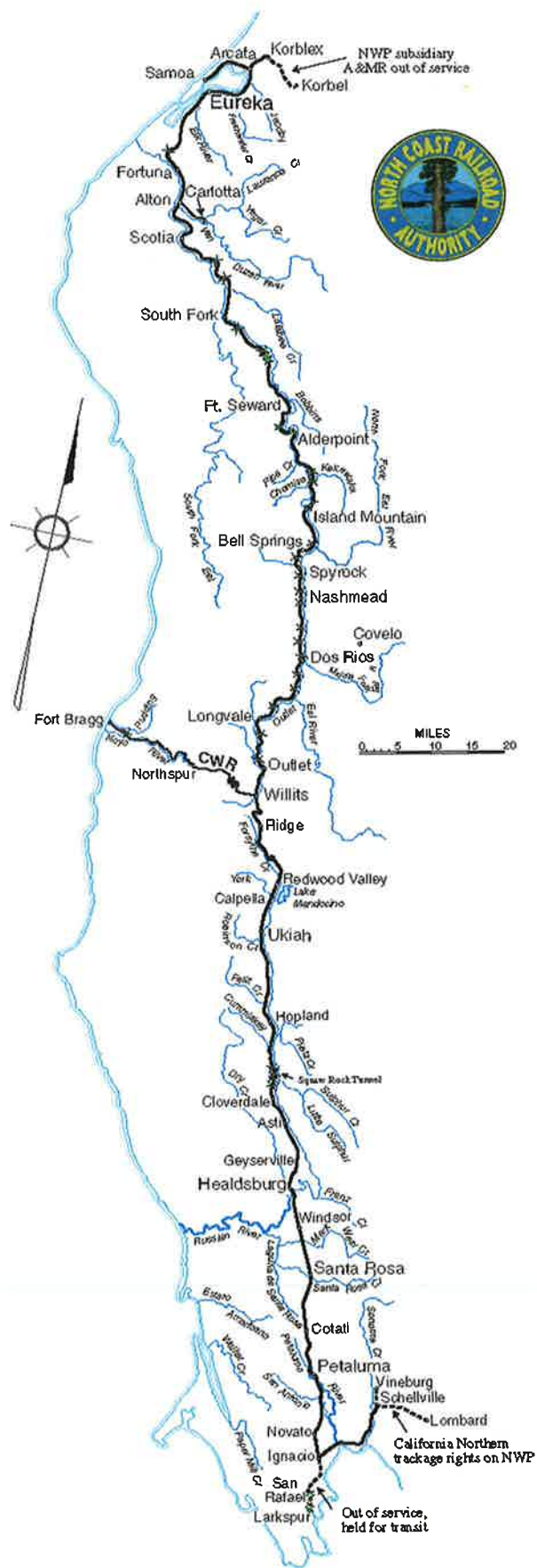


Fig. 1: Route map of North Coast Railroad Authority (2020)  
(from NCRA website)

Korbel = MP 301.8  
Korblex = MP 295.5

Outlet = MP 142.5

Willits = MP 139.5

Healdsburg = MP 68

Petaluma = MP 38.5

Novato = MP 30

Ignacio = MP 25.6

Lombard/Napa Junction = MP 63.4  
(redesignated MP 49.8 S)

[Mileposts approximate]



This proceeding involves a portion of the railroad line owned by North Coast Rail Authority (NCRA), a public agency created by the California legislature for the specific purpose of purchasing the assets of the bankrupt Eureka Southern Railroad and operating them in railroad service. The segment at issue encompasses much of the backbone of the old Northwestern Pacific Railroad (“NWP”) (organized in 1907), namely, (a) 175 miles of rail line extending from the north side of Commercial Street in Willits (roughly MP 139.5) up the Eel River Canyon through Mendocino, Trinity, and Humboldt Counties, CA, with the mainline termination point in Eureka at MP 284.1, and also (b) three branches: Carlotta Branch (MP 262.74 near Alton to MP 267.22 near Carlotta); Korblex (MP 284.1 near Eureka to 295.57 near Korblex); and Samoa (MP 292.84 near Arcata to MP 300.50 near Samoa), extending to MP 302.86 (Fairhaven) plus NCRA’s “subsidiary”--Arcata and Mad River Railroad (or “Annie and Mary”) -- from Korblex to Korbel at MP 301.8.

Summary of Relevant Federal, and Federally-related State,  
Regulatory History Relating to NCRA

NCRA acquisition of interests in old NWP line. NCRA, then a non-carrier, acquired all but MP 139.5 to MP 142.5 (Willits to Outlet Station) from Eureka Southern Railroad pursuant to North Coast Railroad Authority – Acq. & Op. Exemption – Eureka Southern Railroad, ICC Finance Dkt. 32052, decided April 20, 1992 (1992 WL 89295 (I.C.C.)).<sup>1</sup> NCRA subsequently acquired an

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<sup>1</sup> By way of background, SP, owner of the old NWP line, sought abandonment authority, claiming losses of \$1 million per month, but was initially denied such authority pending preparation of an environmental impact statement. See Northwestern Pacific Railroad Company – Abandonment in Mendocino, Trinity and Humboldt Counties, CA, ICC AB-14 (Sub-no. 4), served March 5, 1984 (ordering EIS). Service was embargoed and then surcharged. While the abandonment proceeding was pending, ICC authorized SPT/NWP to sell the line to two related companies owned by Bryan Whipple. See Northwestern Pacific Acquiring Corporation and Eureka Southern Railroad Company – Exemption from 49 U.S.C. 10901 and 11301, reconsideration denied decision served Jan. 29, 1985, aff’d in part and remanded for further consideration on labor protection issues, RLEA v. ICC, 784 F.2d 959 (9<sup>th</sup> Cir. 1986), recon. denied decision December 22, 1987. Eureka Southern operated trains for about two years before going into bankruptcy. To preserve rail service, the state of California in 1989 established NCRA to acquire the line from the bankrupt estate pursuant to legislation under the

additional 74.3 miles of rail line from Outlet (MP 142.5) to Healdsburg (MP 68.2) in Mendocino and Sonoma Counties pursuant to North Coast Railroad Authority – Purchase Exemption – Southern Pacific Transportation Company, F.D.32788, served March 20, 1996 (1996 STB Lexis 85). This latter transaction was related to a transaction in which NCRA was granted authority to acquire by lease and to operate approximately 142.2 miles of the California Northern Railroad Company line, including Outlet (MP 142.5) to Healdsburg (MP 68.2) and to acquire and operate a surface freight and passenger excursion easement for a total of 67.9 miles of line from (i) Healdsburg (MP 68.2) to Novato (MP 26.96), (ii) Novato (MP 29.96) to Ignacio (MP 25.6), and (iii) Ignacio (MP 25.6) to Lombard Station in Napa County, CA (SPM MP 63.4). See North Coast Railroad Authority – Lease and Operation Exemption – California Northern Railroad Company, Northwestern Pacific Railroad Authority, and Golden Gate Bridge, Highway and Transportation District, F.D. 33115, served Sept. 27, 1996.

FRA emergency embargo. Due to washouts and flooding events associated with El Nino storms rendering track unsafe, the Federal Railroad Administration (“FRA”) in December 1998 imposed an “emergency order” (embargo) on all rail operations on NCRA’s lines from Arcata [actually, Korblex] (MP 295.5) to M.P. 63.4 (a point between Schellville and Napa Junction). See 63 Fed. Reg. 67976 (Dec. 9, 1998) (emergency order no. 21; notice no.1).<sup>2</sup> In that order, FRA noted that California Western operates over about one mile of NCRA trackage to reach its passenger depot in Willits (and to interchange freight). Id. FRA granted partial relief from the emergency order to allow California Western Railroad to operate approximately 1.5 miles between its junction with the NCRA track and the Willits depot. 64 Fed. Reg. 30557 (June 8, 1999) (emergency order no. 21, notice no. 2) (this modification permitted California Western to operate its passenger excursion trains into the Willits depot provided certain conditions were met).<sup>3</sup> On February

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leadership of local Assemblyman and Senator (respectively) Dan Hauser and Barry Keene. See CA Government Code Sections 93000, et seq. Lack of funding delayed acquisition until 1992.

<sup>2</sup> NCRA’s ownership extended only to MP 68 (Healdsburg); the remainder of the embargoed line was owned by Northwestern Pacific Railroad Authority, a joint powers agency. See 63 Fed. Reg. 67976.

<sup>3</sup> In approximately March 1999, California Western (acting through certain individuals) acquired the Willits depot from NCRA, and also acquired some trackage rights “to operate over switching, yard, and other track that is excepted



1, 2001, FRA lifted emergency order No. 21 (per notice no. 3, see 66 Fed. Reg. 9625 (Feb. 8, 2001), for approximately 40.8 miles of track owned by Northwestern Pacific Railroad Authority (NWPRA), a joint powers entity comprised of Golden Gate Bridge, Highway and Transportation District (“Golden Gate”), Marin County, and NCRA, between Lombard/Napa Junction (MP 63.4) and MP 43 (Petaluma). On or about January 1, 2003, the State replaced NWPRA with Sonoma Marin Area Rail Transit District (“SMART”), comprised of representatives from Golden Gate, Marin and Sonoma Counties. As authorized by this Board, SMART acquired interests in former NWP trackage in Sonoma and Marin Counties, on at least some of which NCRA had operated. In May 2011, FRA lifted emergency order No. 21 on a total of 61.1 miles of track owned by SMART, all of which is south of a point designated MP 62.9 near Windsor, CA. 76 Fed. Reg. 27171 (May 10, 2011) (emergency order no. 21, notice no. 4). Emergency order 21 remains in effect for all NCRA trackage north of MP 62.9, except for approximately 1.5 miles at Willits to accommodate California Western, now Mendocino Railway.<sup>4</sup>

Lessees of NCRA. NCRA in 1997 contracted with an operator (Rail-Ways, owned by John Darling) to provide service on the line. But as an aftermath of the El Nino storms and FRA embargo, Rail-Ways went into bankruptcy. Mr. Darling

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from this Board’s licensing regulation within the meaning of 49 U.S.C. 10906.” Northwestern Pacific Railroad Company – Change in Operators Exemption – North Coast Railroad Authority, et al., F.D. 35073, served Sept. 2, 2007 (slip op. at 3). California Western’s successor, Mendocino Railway, operating as Skunk Railroad, uses the depot and trackage rights for tourist excursion purposes. See note 3 below. The NCRA line at the time was subject to the FRA embargo.

<sup>4</sup> See Mendocino Railway – Acq. Ex. – Assets of the California Western Railroad, F.D. 34465, served April 9, 2004 (authorizing acquisition from California Western’s trustee in bankruptcy). Georgia Pacific, formerly a major freight customer of California Western/Mendocino Railway, sold its long inactive lumber mill in Fort Bragg to Mendocino Railway, which reportedly plans to develop the property for residential, mixed use and tourism. See <https://www.pressdemocrat.com/article/news/skunk-train-deal-for-bluff-property-could-spur-fort-braggs-remodel/?ref=related>; <https://www.pressdemocrat.com/article/news/fort-braggs-skunk-train-owner-finalizes-buy-of-77-acre-coastal-tract-from/>. Mendocino Railway itself experienced a tunnel collapse, and now only operates passenger excursion trains and/or rail bikes seasonally at each end of its line (Ft. Bragg and Willits). See <https://www.skunktrain.com/> (offers tickets for tourist rides at both ends).

formed another company, Northwestern Pacific Railway Co., LLC. (“NWP Rwy” or “NWPY)), to provide service. STB authorized Mr. Darling’s new company to lease and to operate all 317.6 miles of NCRA’s lines in Northwestern Pacific Railway Co., LLC – Lease and Operation Exemption – North Coast Railroad Authority, Northwestern Pacific Railroad Authority, and Golden Gate Bridge, Highway and Transportation District, F.D. 33998, served Feb. 6, 2001.<sup>5</sup> Mr. Darling announced cessation of service effective Sept. 17, 2001, evidently due to disputes over payment for rehabilitation and maintenance expenses and low operating revenues. In the terse words of FRA, NWPY “ceased operations in September 2001.” 76 Fed. Reg. 27171 (May 10, 2011).

NCRA sought proposals for a new lessee and ultimately negotiated a lease and operating agreement for the line with Northwestern Pacific Railroad Company (“NWPCo”). Although the lease agreement effectively encompassed all of NCRA’s line,<sup>6</sup> NWPCo sought, and STB authorized, a change in operators only for NCRA’s line from Outlet Station (MP 142.5) south. See Northwestern Pacific Railroad Company – Change in Operators Exemption – North Coast Railroad Authority, Sonoma-Marin Area Rail Transit District and Northwestern Pacific Railway Co., LLC, F.D. 35073, served August 24, 2007, as corrected served August 30, 2007. Mendocino Railway sought a stay, denied Sept. 7, 2007. Friends of the Eel River sought revocation of the exemption on grounds STB characterized as relating to the environmental impact of resumption of train operations on the line. STB denied revocation on the ground that environmental thresholds from operations would not be exceeded. Decision in F.D. 35073, served

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<sup>5</sup> STB described the line as a “Eureka segment” from MP 302.86 near Fairhaven to MP 142.5 near Outlet Station, inclusive of the Korblex Branch from MP 285.2 to MP 295.2, and the Carlotta Branch MP 262.7 to MP 267.7. In addition, the STB described additional segments, and noted that NCRA was granting its surface easement rights for a total of 67.9 miles in the Healdsburg, Novato and Lombard segments (none owned by NCRA) to NWPY. Because this history report focusses on the line from Willits north, we are providing only summaries of regulatory developments in connection with the Sonoma and Marin County segments of past or current NCRA trackage.

<sup>6</sup> See “Agreement for the Resurrection of Operations upon the Northwestern Pacific Railroad Line and Lease, North Coast Railroad Authority and Northwestern Pacific Railroad Authority, Sept. 6, 2006,” Parts V and VI (items I and J).



Feb. 1, 2008. NWPCo has subsequently provided freight service on portions of the line south of Windsor.

NWPY's lease terminated on October 31, 2005, pursuant to an agreement dated June 23, 2005. NWPY is now a defunct LLC in the State of California for failure to pay taxes. Its principal and last stated agent for service of process (Mr. Darling) passed away in 2010. NCRA expects to apply for an "adverse" or "third party" discontinuance authorization for NWPY's common carrier obligations under its expired lease for MP 142.5 north.

Additional litigation amounting to regulation bearing on resumption of operations. As the regulatory history indicates, there has been little use of the line north of Willits since NCRA acquired ownership, and none since the FRA embargo in 1998. Most if not all environmental conditions on the line north of Willits arose under the ownership and management of other entities, principally Sothern Pacific (hereinafter "SP"). There are two major litigation-related regulatory events, both arising from environmental concerns, that are germane to the line's regulatory history.

The first litigation-related event concerns possible toxic waste requiring clean up on NCRA's property. Subsequent to NCRA's acquisition of the line, it was sued by a variety of state and local entities to force a clean-up on what was now State property. NCRA entered into an extensive consent decree in 1999,<sup>7</sup> and obtained an appropriation of \$4.1 million from the State of California to comply with the decree. NCRA's environmental consultant (Kleinfelder) has used those funds for, inter alia, an initial assessment, surface clean-up of eight inactive rail yards north of Willits, and waste tie removal.<sup>8</sup> A prior carrier has contractual responsibility to provide further cleanup of the Willits yard.<sup>9</sup>

The second litigation-related regulatory event involves future rail operations on the property. NCRA received state funding for stabilization of the roadway, and

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<sup>7</sup> Hight v. NCRA, Mendocino County Superior Court No. CV 80240, Consent Decree, July 14, 1999.

<sup>8</sup> Kleinfelder, Inc., Documentation of Completion of Waste and Debris Cleanup North Coast Railroad Authority (report prepared for David Anderson), May 1, 2005.

<sup>9</sup> When NCRA acquired the Willits segment in 1996, an escrow was established whereby UP (successor to NWP/SP) agreed to clean up four railyards, including Willits. NCRA represents that only Willits remains un-remediated.

the funds were extended on the condition of compliance with the California Environmental Quality Act (CEQA). Although arguably not required to prepare a CEQA report (environmental impact report or “EIR”) on resumption of rail service on the portion of line from Lombard to Willits, NCRA did, and Friends of the Eel River and Californians for Alternatives to Toxics sued in California Superior Court, claiming NCRA’s EIR<sup>10</sup> was inadequate, and seeking to prevent NWPCo from moving rail traffic between Willits and Lombard pending NCRA compliance with CEQA. The California courts initially found that 49 U.S.C. 10501(b) preempts application of CEQA to resumption of rail operations. See Friends of the Eel River v. N. Coast R.R. Auth., 178 Cal. Rptr. 3d 752 (Cal Ct. App. 2014). While appeals were pending at the California Supreme Court, NWPCo sought an STB declaratory order that preemption applied.<sup>11</sup> The Board declined to issue a declaratory order in Northwestern Pacific Railroad Company – Pet. Dec. Order, F.D., 35977, served April 25, 2016. The California Supreme Court subsequently reversed the lower courts, holding that federal preemption does not apply to release NCRA from CEQA compliance, but that NWPCo operations could not be enjoined. Friends of the Eel River v. N. Coast R.R. Auth., 220 Cal Rptr. 3d 812, 399 P.3d 37 (Cal. Sup. Ct. 2017).<sup>12</sup> NCRA has decertified the EIR.

SB 1029. Effective November 8, 2018, California adopted amendments to NCRA’s enabling statute providing for the State’s Transportation Agency in consultation with the State’s Natural Resources Agency to assess the most appropriate means to dissolve NCRA and to dispense with its assets, consistent with (a) potential transfer of the southern portion of the rail line to SMART, (b) preserving freight rail service where it currently exists, and (c) railbanking and potential trail use of some or all of the remaining portions of the NCRA’s lines. The Transportation Agency was required to report to the legislature by July 1, 2020. The Agency’s report is now publicly accessible at <https://calsta.ca.gov/subject-areas/reports>.

A&MR or “Annie and Mary.” The Arcata and Mad River Railroad (“A&MR”) connected to the NWP system at Korblex (approximately MP 295.57) and ran

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<sup>10</sup> A copy of the final EIR (2011) may be found at:  
<http://www.northcoastrailroad.org/Acrobat/FEIR/>

<sup>11</sup> [https://www.stb.gov/filings/all.nsf/ba7f93537688b8e5852573210004b318/66e2fb232d24009e85257f02006d3260/\\$FILE/239584.pdf](https://www.stb.gov/filings/all.nsf/ba7f93537688b8e5852573210004b318/66e2fb232d24009e85257f02006d3260/$FILE/239584.pdf)

<sup>12</sup> The Superior Court for Marin County in December 2018 awarded \$1.9 million in attorney’s fees against NCRA as a result of the California Supreme Court ruling.



eastward to Korbel. ICC authorized the A&MR for abandonment in Arcata and Mad River Railroad Company – Ab. Ex. – in Humboldt County, CA, ICC AB 241X, served April 23, 1985, decision effective May 24, 1985. A stay was denied by ICC decision served June 4, 1985, and reconsideration was denied by an ICC decision served April 10, 1986. NCRA, with assistance from Josh Buck’s research efforts, states the subsequent history for this line in Exhibit B to this combined ER/HR. In a nutshell, Simpson Timber Company sold the line to Eureka Southern (then in bankruptcy) in September 1988 evidently for reinstitution of freight rail service, and NCRA acquired AMR from Eureka Southern. There is no indication that Simpson Timber Company, Eureka Southern, or NCRA sought ICC (or STB) authority for acquisition of the A&MR as a common carrier railroad. The line was operated for freight rail purposes as late as 1993-94, and was scheduled for a multi-million-dollar rehabilitation at the time NCRA acquired the southern portion of its system from NWP/SP in 1996. Rail was removed in anticipation of replacement, but the funds were diverted to fixing the mainline, and then the entire northern system was embargoed in 1998, suspending all forward progress. NCRA adopted a Resolution in 2008 that indicates that NCRA regarded the A&MR as subject to federal rail regulatory abandonment jurisdiction, and NCRA continues to include AMR as a subsidiary on its system map. Should AMR, which has historic significance,<sup>13</sup> still be within STB abandonment jurisdiction, NCRA includes it in this proceeding, will seek a railbanking order for it, and therefore includes it in this narrative. If outside STB abandonment jurisdiction, NCRA reserves the right to railbank the line “privately,” per Southern Pacific Transportation Company – Exemption – Abandonment of Service in San Mateo County, CA, AB 12 (Sub-no. 118X), served Feb. 20, 1991, 1991 ICC Lexis 54 at \*12 [spur outside ICC jurisdiction may be privately railbanked under the language of 16 U.S.C. 1247(d)] and other authorities.

NCRA’s dilemma. When NCRA was formed, California did not adopt any stable funding mechanism for repairing, maintaining, or cleaning up the line. NCRA instead had to rely on sources such as FEMA (in the event of catastrophic weather events) or annual appropriations. These have not proved adequate to address problems that triggered the 1998 emergency embargo by FRA, much less

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<sup>13</sup> In particular, the old A&MR was the original railroad at Humboldt Bay and one of its original segments was incorporated into the original NWP and is now what is known as the Korblex Branch of NCRA’s lines. (To be clear, the Korblex Branch has not heretofore been proposed or authorized for abandonment.)

subsequent events impacting the line, except for portions of the line south of Windsor. NCRA is now heavily in debt. NCRA's situation is summed up in the following paragraph from the "history" section of its website:

"Since its inception, the NCRA has been confronted with three substantial challenges: (1) to establish a public-private partnership whereby the NCRA would have policy and oversight authority, while the railroad itself would be operated by a qualified and experienced private entity; (2) to operate an ongoing railroad enterprise without start-up operating capital on a right-of-way that had suffered from years of deferred maintenance; and (3) to obtain Federal and State funds to repair the right-of-way, as a result of both deferred maintenance and consecutive years of weather-related disasters, so as to allow the railroad operation to be viable for the long-term future."

It is now over 20 years since the embargo. There has been no freight rail service north of Windsor in all that time. Funds to restore the line to lift the FRA embargo so as to allow such service have not been available from Federal or State sources. Moreover, NCRA has not achieved compliance with CEQA for freight rail operations.

The State with the adoption of SB 1029 has resolved NCRA's dilemma by adopting legislation directing a focus on (1) preservation of the railroad corridor -- but not for current rail purposes -- in the north, and (2) cooperation with SMART in the south, including preservation of freight rail service that currently exists. SMART in February 2021 received authorization to acquire NCRA's lines from the Sonoma/Mendocino County line (approximately MP 89) south. Sonoma-Marin Area Rail Transit District – Acquisition and Operation Exemption – North Coast Railroad Authority, FD 36481, served Feb. 18, 2021. NCRA is now seeking abandonment/railbanking (16 USC 1247(d)) authority for the line from Commercial Street in Willits north (approximately MP 139.5). NCRA has not yet determined the appropriate path forward in connection with Willits to Cloverdale.

The next section of this summary of the line's history will address, among other things, why the line has had the maintenance, rehabilitation, and insolvency issues to which the regulatory history above alludes.



## Summary of the Assembly and Operational (Economic) History of NWP<sup>14</sup>

The location of the railroad route of the NWP can best be understood as flowing from (1) the burgeoning timber industry in Humboldt Bay and in northern California, and (2) rivalry and ultimately cooperation between two major railroads: SP and the Atchison, Topeka and Santa Fe (ATSF). The subsequent history of the railroad on that route is largely controlled by (3) the rough terrain (exposing the line to tunnel fires) and geological instability of the region traversed, particularly between Outlet Station and Scotia (Eel River Canyon), which in turn exposed the line to (4) increased competition from the trucking industry following upon the development of better public highways.

First railroad in California (Humboldt Bay). The first railroad in California was constructed in 1854 by the Union Wharf and Plank Walk Company in Humboldt Bay at Arcata. It employed wooden rails overlain with scrap iron, with carriages pulled by horse, in support of, initially, the Trinity River gold mines. During the next two years, it was extended inland two miles. In 1875 it was renamed the Union Plank Walk and Railroad Company, with iron faced rails and a small steam locomotive.

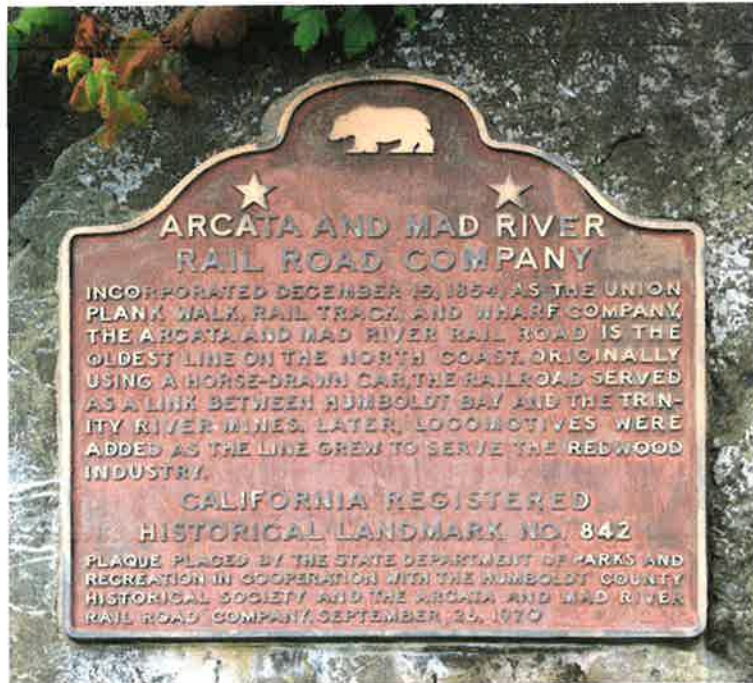
Fig. 2: plaque commemorating original plank RR in Arcata Marsh Wildlife Area



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<sup>14</sup> The remainder of this synopsis of NWP/NCRA history relies heavily on information compiled and provided by Josh Buck, whose senior thesis (history) at Humboldt State University was a study of the history of the NWP line. Mr. Buck has also furnished relatively current photographs of tunnels, bridges, and other notable structures on this line, 50 years old or older, to accompany this report.

In 1875 it became the Arcata Transportation Company, adding track to more local mills. The Arcata and Mad River Railroad (“A&MR” or “Annie and Mary”) took over, replacing the plank rails with steel T-rail, and extending the line to the Humboldt Lumber Mill, owned by the Korbel Brothers, in what is now Korbel. In



1884 the Korbels purchased the A&MR, and the system eventually had 27 miles of common carrier and private logging track. A&MR was narrow gauge until 1925, when a third rail was added to support standard gauge. The southern portion of the A&MR line was a grandparent (along with Cal. & Northern) of the Korblex Branch of NWP (Eureka/Arcata to Korblex).<sup>15</sup> Simpson Logging Company acquired

Fig 3: plaque commemorating the A&MR (California Historical Landmark No. 842) near Blue Lake Depot.

Fig 4 (right): Blue Lake Depot in its heydays, now the Blue Lake Museum. A&MR’s nickname (“Annie & Mary”) reportedly refers to Annie Carroll and Mary Buckley, bookkeepers in the North Fork (Korbel) and Arcata depots.



<sup>15</sup> See S. Borden, Arcata and Mad River, *The Western Railroader* (vol 17, no.8, 1954) p. 4, passim, and map; generally, W.E. Butler, “Our Two Oddest Roads,” *Railroad Magazine*, Sept. 1934, at 38;



the northeastern portion in 1956.<sup>16</sup> The line had 15 shippers on its then 7.5 miles. But in 1982-83, storms washed out the main NWP line in several places, and although service was restored, the NWP \$1200 surcharge drove shippers to trucks, largely dooming the A&MR, on which service ceased in 1983. Simpson Timber Company (which then owned A&MR) acquired the line out of abandonment, transferring it to Eureka Southern in September 1988 for \$30,000. It was acquired by NCRA in 1992 out of Eureka Southern's bankruptcy.<sup>17</sup> NCRA removed A&MR's track in anticipation of rehabilitation but had to divert grants intended for rail restoration to address intervening additional storm damage to the mainline, which was then embargoed after more damage. See Exhibit B to ER/HR.

The A&MR pioneered railroads for the local timber industry in Humboldt County. Another important early Humboldt County railroad, especially for the history of the NWP, was the Eel River and Eureka, organized in 1882, with a primary run of 25 miles from a depot at Second Street in Eureka to Alton to a terminus at Burnell's station, near Hydesville.<sup>18</sup> (The line from Alton to Burnell's station, and then on to Carlotta is now NWP's Carlotta Branch. The extension to Carlotta is attributed to California Midland Railroad.<sup>19</sup>) Alton became a junction as a result of the purchase, in 1863, by the founders of the Pacific Lumber Company (TPLC, later PALCO) of 6000 acres of timberland lying along the banks of the Eel River in Humboldt County.<sup>20</sup> TPLC sought a way to transport its timber to its mill south of Eureka, and ended up choosing a geologic anomaly known as

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<sup>16</sup> "Simpson Takes over Northern Redwood at Korbell," The Times Standard, March 5, 1956, at 12 (<https://www.newspapers.com/image/37593683>).

<sup>17</sup> See generally H. Sorensen et al, Steam in the Redwoods (Caldwell, ID: The Caxton Printers) 1988 at 8; Tunnel Fire Closes Down Eureka Southern, Ukiah Daily Journal, Nov. 6, 1988 at 12 (<https://www.newspapers.com/image/2974055>) (\$30,000); Arcata & Mad River Railroad in Wikipedia gives price as \$300,000.

<sup>18</sup> G. Gneiss, Redwood Railways: A Story of Redwoods, Picnics and Commuters, (Berkeley CA, Howell North Press) 1956, p. 93.

<sup>19</sup> S. Borden, "San Francisco & Northwestern," The Western Railroader, Jan. 1963, at 7 (California Midland was a subsidiary of Eel River & Eureka).

<sup>20</sup> S. Baker, "Scotia Home of the Pacific Lumber Company," within Susie Baker Fountain Papers, ed., Humboldt Room Archive, 1<sup>st</sup> ed. (Arcata CA: Humboldt St. University Library), 1967, at 96: 194.

Scotia's Bluffs (blue sandstone and layers of clam shells) in the Rio Dell area.<sup>21</sup> The Bluffs were unstable and TPLC had to monitor for slides regularly (see fig. 11 infra). The TPLC line ran from the Scotia area north to intersect with the Eel River and Eureka at Alton.

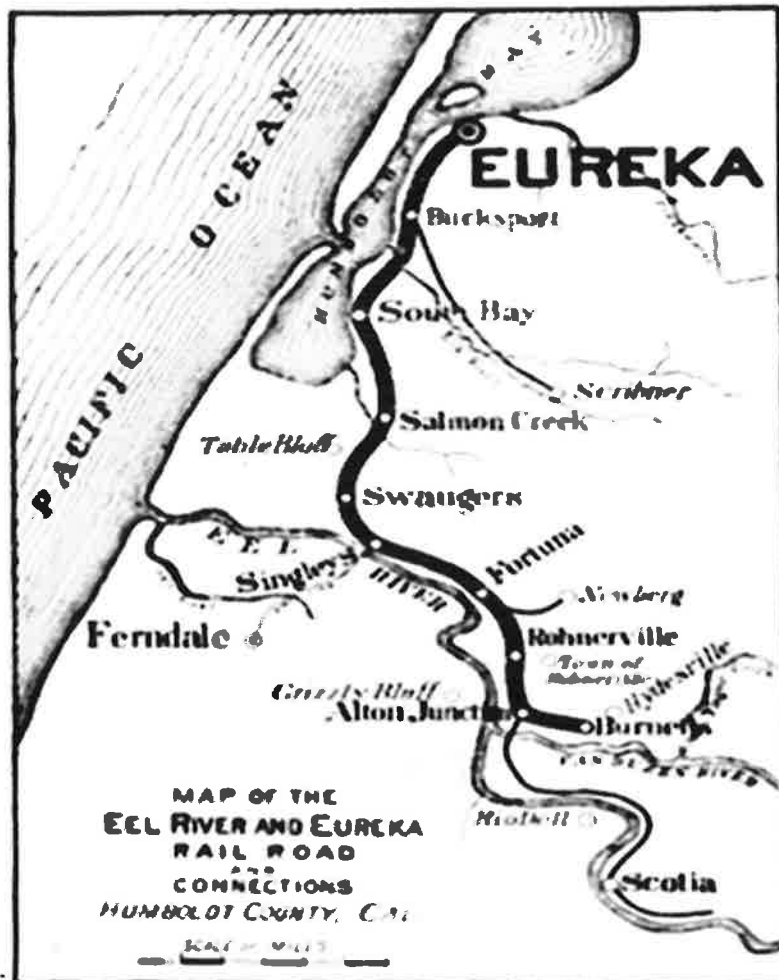


Fig. 5. Map, circa 1896. The Pacific Lumber Company railroad through Scotia is depicted south of Alton. The line to "Burnell's" became part of NWP's Carlotta Branch.

<sup>21</sup> F. Cook, "Alonzo Painter: A Bad Loser," in *History of Rio Dell and Scotia Bi-Centennial Ed.*, Pioneer, CA: Cal. Traveler, 1980 at 47. TPLC wanted their line to pass through Rio Dell using two bridges over the Eel River. TPLC allegedly [footnote cont'd] rejected Mr. Painter's initial asking price for a right-of-way, but when, on reconsideration, TPLC said it would pay, Mr. Painter doubled it. TPLC backed out. Painter later fell into economic hardship and allegedly jumped to his death off Scotia Bluffs.



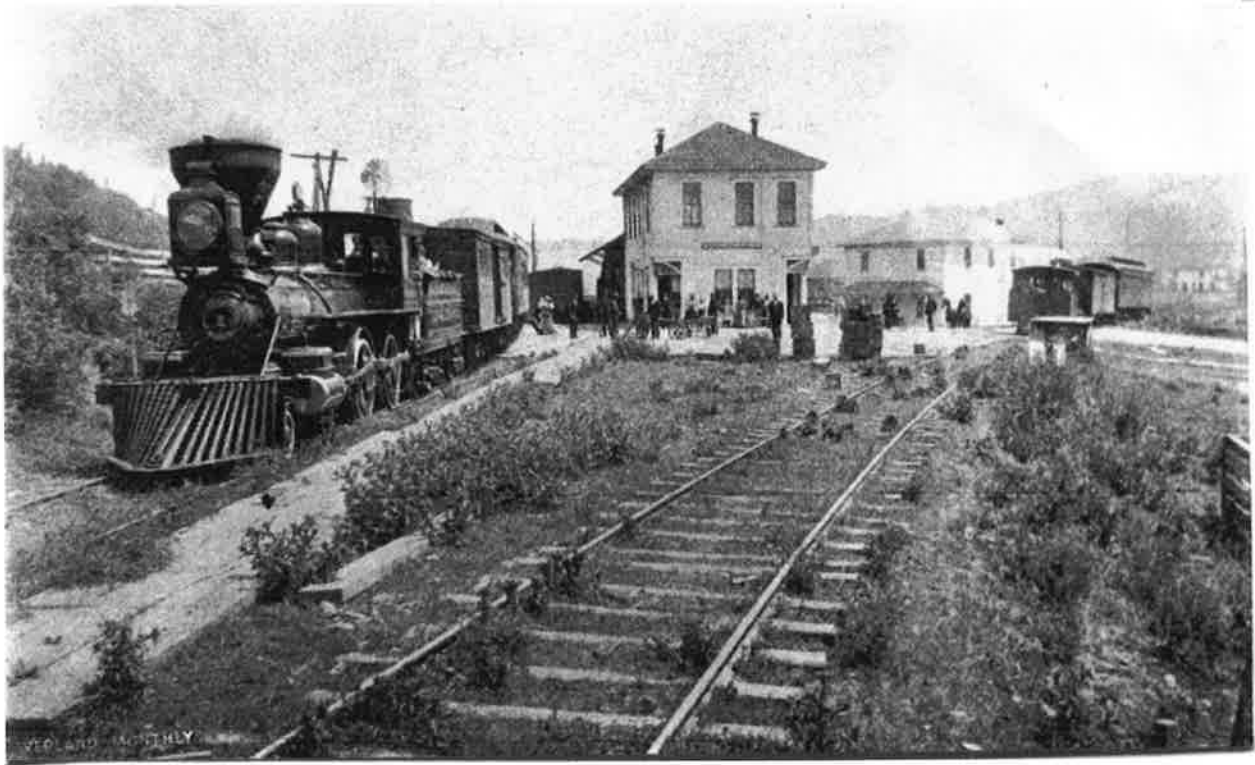


Fig. 6. Alton Junction, c. 1890's

Attracted by the booming timber trade, ATSF through its subsidiary San Francisco and Northwestern Railway (SF & NW) acquired a group of Humboldt Bay lines, including the Eel River and Eureka as well as TPLC's line to Scotia and up the Eel River (TPLC retained the right to use the lines for timber operations<sup>22</sup>). SR & NW ultimately created a 50-mile mainline from Arcata to points south of Scotia.

In the meantime, timber interests in 1896 organized the Eureka and Klamath River Railroad, which served among other properties, a mill in Samoa (genesis of NWP Samoa Branch). The mill and railroad were purchased by Andrew Hammond in 1900. In 1903, Mr. Hammond's railroad was acquired by SP's subsidiary Oregon and Eureka Railroad, and was extended north toward Trinidad

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<sup>22</sup> E.g., S. Borden, "NWP's Carlotta Branch," *Western Railroader*, 1958, at 5; Wikipedia entry for Pacific Lumber Company (chapter on TPLC railroads).

to serve additional logging operations.<sup>23</sup> This also rendered more difficult ATSF's task to construct a northern connection toward Oregon.



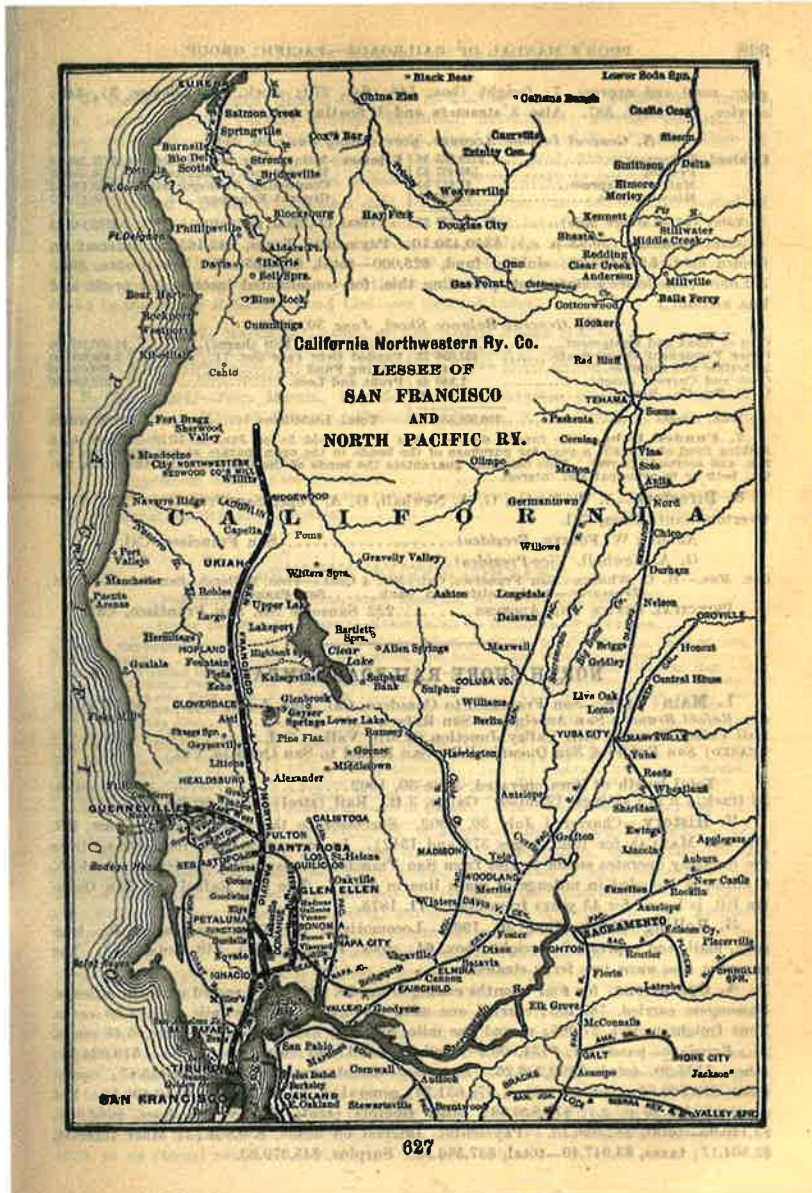
Fig. 7. Eureka and Klamath River RR, redwood logs, 1888

ATSF and SP apparently both pondered connections from Humboldt Bay either north to Portland via Oregon or south to San Francisco. SP formed the California Northwestern Railway in 1898 to assume control of the San Francisco and Northern Pacific, which had extended from the Petaluma River to Santa Rosa

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<sup>23</sup> "Here and There," *Ferndale Enterprise*, Nov. 17, 1903, at 8 (<https://www.newspapers.com/image/629470085>).





(1870), to Cloverdale (Mendocino/Sonoma County line) in 1872, and Ukiah in 1889.<sup>24</sup> California Northwestern extended the line to Willits in 1902.<sup>25</sup>

Fig. 8. Poor's 1903 Map of SP's California Northwestern and SF&NP; note ATSF's San Francisco and Northwestern from Eureka to the Eel River.

Realizing that the cost to reach Humboldt Bay with one line was enough

of a challenge, ATSF and SP in 1906 pooled their resources, forming Northwestern Pacific Railroad (NWP), merging into it their various relevant subsidiaries, and

<sup>24</sup> "Four Routes Surveyed into the Northern Forests: Traffic Arrangements Between the California Northwestern and the Donahue Lines," San Francisco Chronicle, March 25, 1898, at 12 (<https://www.newspapers.com/image/27363241>).

<sup>25</sup> "Want Right of Way," Ukiah Daily Journal, Dec. 26, 1902, at 1 (<https://www.newspapers.com/image/334647>)

sharing ownership 50/50.<sup>26</sup> For unknown reasons, but most likely simply because it seemed the shortest link between ATSF's line terminating south of Scotia and SP's line terminating near Willits, the railroads elected to construct the line to Humboldt County along the middle fork of the Eel River. Ultimately, ATSF sold all of its interests in NWP to SP on January 17, 1929 for \$4,443,349.00, rendering SP the sole owner of the line.<sup>27</sup>

The geography (terrain and steep grades of the hills) in the river valley traversed by the line made construction no easy task. Between Sausalito and Eureka, the line passed through 41 tunnels, with 30 in the Eel River Canyon alone. Arguably more problematic over the long term was the geology. The ground was unstable: the tunnels and roadbed tended to "move."<sup>28</sup> This problem was not limited to the Scotia Bluff's to which TPLC's extension from Alton had in effect committed the NWP, but also included the Eel River Canyon. In addition, the Eel River Canyon was prone to flooding. The geography meant that the railroad was at risk of costly and disruptive tunnel collapse in the event of fires or earthquakes. The geology meant that the line was subject to a need for constant realignment, as well as slide removal and prevention. The accompanying flood hazard meant the line was subject to expensive and disruptive wash-outs, as well as loss of bridges. In short, although considerable capital was invested in construction, the route chosen rendered the line "high maintenance."

During the glory years of the timber industry, the line generated the traffic necessary to sustain a high maintenance operation. But as highways improved, truck competition increased, limiting the ability of a rail carrier to increase or even to maintain adequate tariffs to cover maintenance costs. Even worse, the railroad's frequent embargoes due to tunnel fires, mudslides, and wash-outs made it a less reliable transportation supplier than trucks. Ultimately NWP's market share of redwood and timber production dropped to the point that the line became speculative rather than profitable.

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<sup>26</sup> "Seven Railways Joined: Southern Pacific and Santa Fe Will Jointly Control the Northern Coast Lines," *The San Francisco Chronicle*, Dec. 30, 1996, at 43 (<https://www.newspapers.com/image/87825982>).

<sup>27</sup> See "Sale of Northwestern Pacific Confirmed by Commission," *The Mendocino Beacon*, Jan. 5, 1929 (<https://www.newspapers.com/image/624922007>).

<sup>28</sup> E.g., G. Gneiss, *supra*, Redwood Railways 134.



SP gave the following overview of the geological issues faced by NWP in NWP's 1983 abandonment application for the line:

“The NWP main line in the proposed abandonment territory [MP 142.5 near Outlet to MP 284.1 near Eureka] exists in an area that is geological unstable. [NWP's] track parallels the Eel River between Dos Rios (MP 166.5) and Fernbridge (MP 268.7). In that territory, the railroad crosses 150 locations where its subgrade constantly sinks during the rainy season – from 2 to 14 inches each week – and/or where slides are active above the track. Many of these locations are relatively short (50-75 feet), but still require almost daily attention each winter to keep the track in alignment and free of debris.”

Application of NWP for a Certificate of Public Convenience and Necessity authorizing the Abandonment of a Line of Railroad at p. 8 (Sept. 1, 1983) in Northwestern Pacific Railroad Company, ICC dkt. AB-14 (Sub-no. 4).

Two examples of chronic slide problems: (a) MP 201.0 mud glacier in the Eel River Canyon (Fig. 9 below): “[w]hen it would get saturated the old mud would flow like ice.”<sup>29</sup>

(b) Berger Creek slide near Dos Rios (MP 167.1-.35), resulting in both sink areas and bumps.<sup>30</sup> NWP constructed some track in panels so it could be more easily realigned.

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<sup>29</sup> Bill Lynch, “Island Mountain Escape and Rebuild of the NWP,” interview by Josh Buck, Nov. 11. 2011.

<sup>30</sup> Lynch, *supra*.



Fig. 9. MP 201 mud glacier c. late 1990's; J. Buck collection, photo attributed to Dan Hauser; note excavator recontouring grade for NCRA. (Slide is 900 feet wide, est. 2.75 miles long, 1600 feet over top of rail, 18 million cubic yards of material<sup>31</sup>)

Before turning to SP's exit, it is appropriate to summarize some of the more significant fires, floods, and wash-outs impacting the line from its completion (1914) up to SP's exit (sale to Eureka Southern) in 1985. The schematic map below may assist in locating various events on the line.

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<sup>31</sup> F. Codini, "Slide at MP 201! Eel River Canyon Mud is NWP's Nemesis." *The Northwesterner* Vol. 12 No.1 (Santa Rosa: The Northwestern Pacific Railroad Historical Society) Spring-Summer 1998, p. 13.



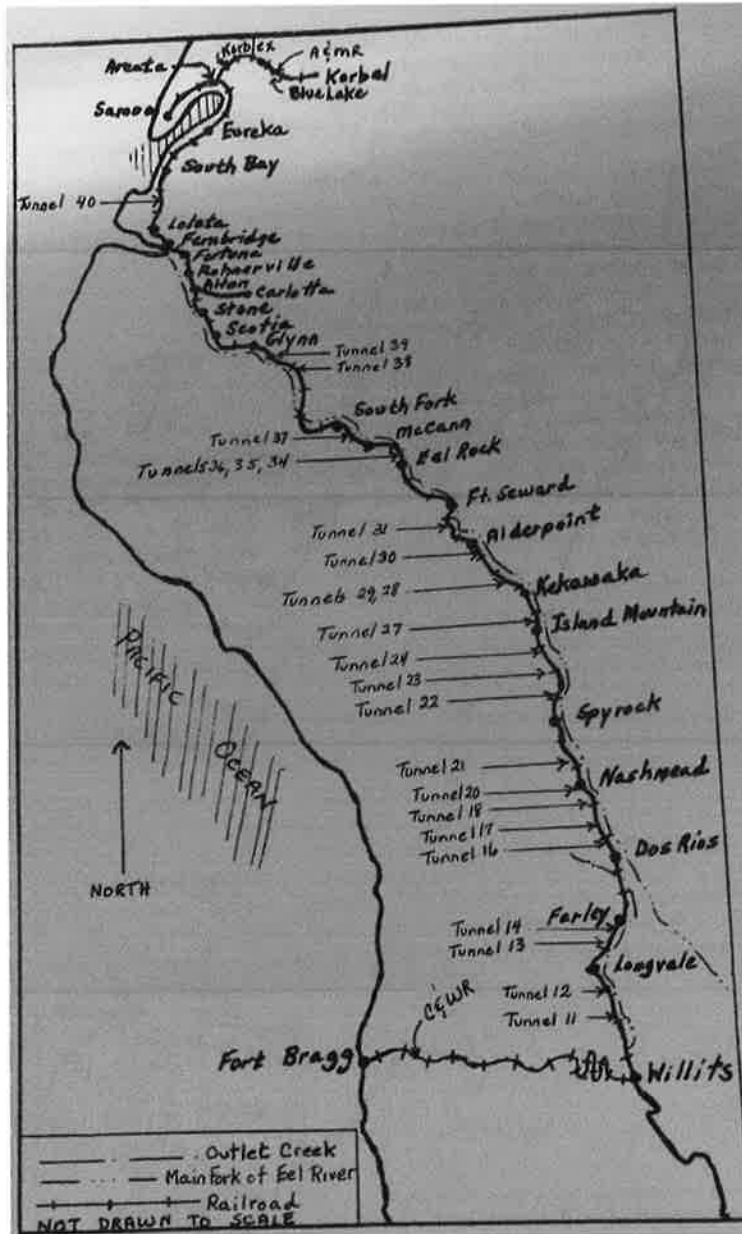


Fig. 10. From W. Fox, Northwestern Pacific Railroad and its Successor.

Notable slides impacting NWP (1914 to 1985):

October 23, 1914 (the day that SP general superintendent Warren Palmer and his daughter drove the golden spike into the last tie at Cain Rock in Eel River Canyon): 300-yard slide at Sonoma Creek near Whitlow and south of McCann delayed the arrival in Eureka of the first passenger train from Sausalito until 2 AM.<sup>32</sup>

<sup>32</sup> "Eureka Finally Connected with Outside World Despite Landslide," The Los Angeles Times, Oct. 24, 1914 (<https://www.newspapers.com/image/380180638>).

November 24, 1945: Scotia Bluffs slide buried 550 feet of track up to 48 feet deep in dirt, trees and stumps. Nonetheless, crews from NWP and Morrison-Knudsen reopened the railroad after only ten days.<sup>33</sup>



Fig 11. French's Gulch portion of Scotia Bluffs, postcard photo showing slide circa 1890-1906 knocking out TPLC trestle and roadbed, photographer unknown, from J. Buck collection. (Same route used by NWP.)

January 17, 1953: A massive slide at Scotia Bluffs knocked an eighty-ton locomotive into the Eel River, killing three railroad employees who could not escape from the cab.<sup>34</sup> There is a memorial to the three men at the former NWP Fortuna depot, now a museum (see fig 12, next page).

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<sup>33</sup> "Restraining a River... Rescuing a Railroad: It's All Dirt to Em-Kayans," *The Em-Kayan*, Feb. 1946, at 4. The rail line maintained an elaborate series of benches, retaining walls, and trestles approximately 50 feet (16 meters) above the river at Scotia Bluffs, but the cliffs extend 75 to 500 feet (25–150 meters) above the track. These trestles and benches have been frequently damaged by floods and by massive blocks of sandstone falling from the upper cliffs. Rail service was interrupted in 1907, 1913, 1933, 1938, 1942, 1946, 1955, 1956, 1957, 1964 and 1971. Flood waters reached track level in 1955 and were 11 feet (3.3 m) over the railway in 1964.

<sup>34</sup> "Divers Search for Bodies Trapped in Locomotive Disaster," *Humboldt Standard*, Jan. 19, 1953, at 1 (<https://www.newspapers.clom/image/37627237>).



January and March 1983: slide at Scotia Bluffs shuts railroad down for a month. Then “[o]n March 29<sup>th</sup> at the Scotia Bluffs, an even bigger mudslide than in January closed the North end, while mud and debris were cleared away. During the closure time, the parent company, SP placed an embargo on all traffic moving between Eureka and Willits, stating the tracks were unsuitable for



Fig 12. NWP (and predecessor) depot building 1893-1965, now Fortuna Depot Museum, after move to Rohner Park. A bell visible adjacent to the flag pole commemorates the loss of the engineer, fireman and brakeman who died at Scotia Bluff while working for the railroad 17 January 1953.

further service.”<sup>35</sup> The embargo was challenged by shippers at ICC. SP was required to lift the embargo, but imposed a \$1200 surcharge, also challenged.<sup>36</sup>

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<sup>35</sup> W. Fox, *Northwestern Pacific Railroad and its Successors* (Arvada Co: Fox Publications) 1995, p. 6.

<sup>36</sup> Surcharge Tariff Filing of Northwestern Pacific Railroad Co., eff. July 18, 1983, docketed as (ICC) Tariff NWP 6000.

These slides ultimately resulted in NWP filing an application for abandonment authority with ICC for the line north of MP 142.5 (Outlet Station) on September 1, 1983.

Notable floods (1914-1985)<sup>37</sup>

December 1955: Record flooding in Humboldt County. The TPLC company town of Scotia lost a million feet of lumber to the raging Eel River. NWP was heavily damaged, with Scotia Bluffs, Fort Seward, Alderpoint, Island Mountain, and Dos Rios being particularly hard hit. Nonetheless the railroad was reopened after only forty-five days, but at a cost of \$3.62 million (inclusive of lost revenue).<sup>38</sup> There were proposals to dam the Eel River to control flooding, and to re-route the railroad, but these were criticized on grounds that a re-route was expensive (\$130 million), the local economy was rail-dependent, and truck alternatives were unsatisfactory. By 1962, NWP still retained 80% of the lumber transportation business.<sup>39</sup> By 1964, “NWP really was in the best condition it ever was ..., I know that for a fact.”<sup>40</sup>

December 1964: Steady and warm rainfall during the Christmas season exacerbated by melting snow from the mountains caused six local rivers (Eel,

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<sup>37</sup> There in fact were notable floods in 1909 and 1913 while the railroad was being constructed. Flood waters in 1909 reached as high as the surveyors' stakes but the rail line was constructed nonetheless. See R. Matheson, *The History of Alderpoint* (Eureka, CA: Matheson Publishing), 1998, pp. 42-43. The 1913 flood caused dozens of slipouts, tunnel closures from slides, loss of a pier at the Island Mountain bridge crossing, and evidence that water topped the Cain Rock Bridge's piers. See N.W.P. R.R. Willits to Shively photo album (contact Josh Buck). These floods amounted to warning shots of the conditions to be expected on the route.

<sup>38</sup> ... And High Water! Pictorial Review of Northwestern California's Disastrous Christmas Flood 1955 (Eureka, CA: Pacific Logger Publications) 17; “Thank You for Your Patience,” Ukiah News, 16 Feb. 1956 <https://www.newspapers.com/image/4989465/?terms=northwestern+pacific+railroad> at 6.

<sup>39</sup> R.E. Foley, et al., *Memorandum: Brief History and Economics of the Operation of the Northwestern Pacific Railroad* (San Francisco, CA: Southern Pacific Co.) at 4 & 6, 5 October 1962.

<sup>40</sup> Bill Lynch interview, supra (Lynch participated in an inspection tour of the line in September 1964 as a division engineer for the railroad).



Trinity, Smith, Klamath and Van Duzen) to rise dramatically.<sup>41</sup> Water at South Fork rose 20 feet over the roadbed. Water at Scotia Bluffs rose to a height exceeding the headlight of a locomotive standing on the tracks. Bank slumping and landslides contributed to a record sediment load in streams throughout the Eel River basin, contributing to the damage to local communities and the NWP.<sup>42</sup> Track, depots, crew facilities and three bridges were lost. 100 miles of track needed reconstruction.<sup>43</sup> Faced with loss of business to trucking (the highways were also flood-damaged but recovered more quickly), NWP focused on repairing the line as quickly as possible rather than re-routing, with work commencing at both ends of the flood damage: Scotia (north) and Dos Rios (south). In addition, camps were constructed for workmen throughout the Canyon (e.g., South Fork, Spyrock, Eel Rock, Island Mountain).<sup>44</sup> Although the line was restored to service (at a cost exceeding \$10 million) surprisingly quickly (177 days), the disaster cost NWP most dearly in terms of creating competition: NWP and SP had offered reduced rates on lumber shipments trucked out to the nearest railheads. This enticed the use of trucks.<sup>45</sup> Mr. Lynch said that “the business never came back on the NWP...we were hauling at least two hundred cars out of Eureka a night before the flood, and after we had the railroad rebuilt, the truckers never gave the business up.”<sup>46</sup>

#### Some Significant Tunnel Fires (1914-85)<sup>47</sup>

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<sup>41</sup> G. Rumney et al, *The 1964 Flood of Humboldt and Del Norte* (Charleston, SC: Arcadia Publishing) 2014, 7-8.

<sup>42</sup> See W. Brown, et al., *Sediment Transport and Turbidity in the Eel River Basin, California* (Washington, D.C. USGPO) 1971 at 1; “The Christmas Week Storm Disaster on the SP and NWP” (Southern Pac. Co., Southern Pacific Publications) 1965, at 8 (other locations reached 21 feet above roadbed).

<sup>43</sup> “One-hundred Miles of NWP Track Ravaged by Flood Waters,” *Humboldt Standard*, 2 January 1965; “Golden Spike Reopens North Coast Railroad,” *The Los Angeles Times*, June 17, 1965 at 1

(<https://www.newspapers.com/image/382083438>).

<sup>44</sup> Christmas Week Storm Disaster, *supra* at 6.

<sup>45</sup> “NWP is Back in Business!,” *Southern Pacific Bulletin* (July 1965) 2-3.

<sup>46</sup> Lynch, *supra*.

<sup>47</sup> There are significant tunnels south of Willits that have experienced significant damage. For example, the July 1961 Puerto Suello tunnel fire on the outskirts of San Rafael was initially deemed too costly to repair. F. Stindt, *The Northwestern*

June 1955 (Alderpoint): Tunnel fire closes all traffic in Eel River Canyon for a month, costs \$675,000 to repair (not counting lost revenue).<sup>48</sup>

Sept. 9, 1978, tunnel no. 27 (Island Mountain in the Eel River Canyon): Tunnel 27 is hard to reach except by rail and was found engulfed by flames on Sept. 9, 1978. The fire continued for 14 days even after both ends of the tunnel were sealed. The cost to (unsuccessfully) fight the fire was \$1.2 million. Morrison Knudsen estimated six months for repairs.<sup>49</sup> SP/NWP considered abandoning the line.<sup>50</sup> After considerable pressure resulting from the view that the line was a “vital link,”<sup>51</sup> SP agreed to rebuild the tunnel. Total cost to repair was \$12 million. Tunnel closures and other disruptions made NWP appear unreliable. Local businesses began entering into long term trucking contracts. According to NWP, the rail disasters resulted in some 47 trucking companies soliciting business away from the railroad.<sup>52</sup> The lumber market in the meantime fell into a slump.<sup>53</sup> According to SP/NWP, the railroad’s business slumped from about 65,000 carloadings in 1972 to only about 15,000 in 1982. See Figure 13.

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Pacific Railroad Vol 1: Redwood Empire Route (Kelseyville, CA: Fred A. Stindt publications) 1964, at 58.

<sup>48</sup> “Fire Continues in NWP Tunnel Near Alderpoint,” Humboldt Standard, July 2, 1955, at 1 (<https://www.newspapers.com/image/37600306>); “Burned Tunnel Under Repair on Rail Route,” The Em-Kayan, Oct. 1956, at 12.

<sup>49</sup> “Morrison-Knudsen to Work to Reopen the NWP’s Fire Ravaged Island Mountain Tunnel,” Pacific News, August 1979 at 13; A. Tracy, “Northwestern Pacific Railroad Island Mountain Tunnel Fire,” Western Railroader, 1980, at 3; “Humboldt County Fights Plan for Abandonment,” The San Francisco Examiner, March 28, 1979, at 8 (<https://www.newspapers.com/image/460817880>).

<sup>50</sup> “Humboldt County Fights Plan for Abandonment,” supra; “Northwestern Pacific Threatens Abandonment,” Pacific News, April 1979, at 24.

<sup>51</sup> “Light at the End of the (NWP) Tunnel, The Ukiah Daily Journal, August 5, 1979, at 3 (<https://www.newspapers.com/image/1377334>).

<sup>52</sup> NWP Abandonment Application, supra, at 33.

<sup>53</sup> Id. at 22.



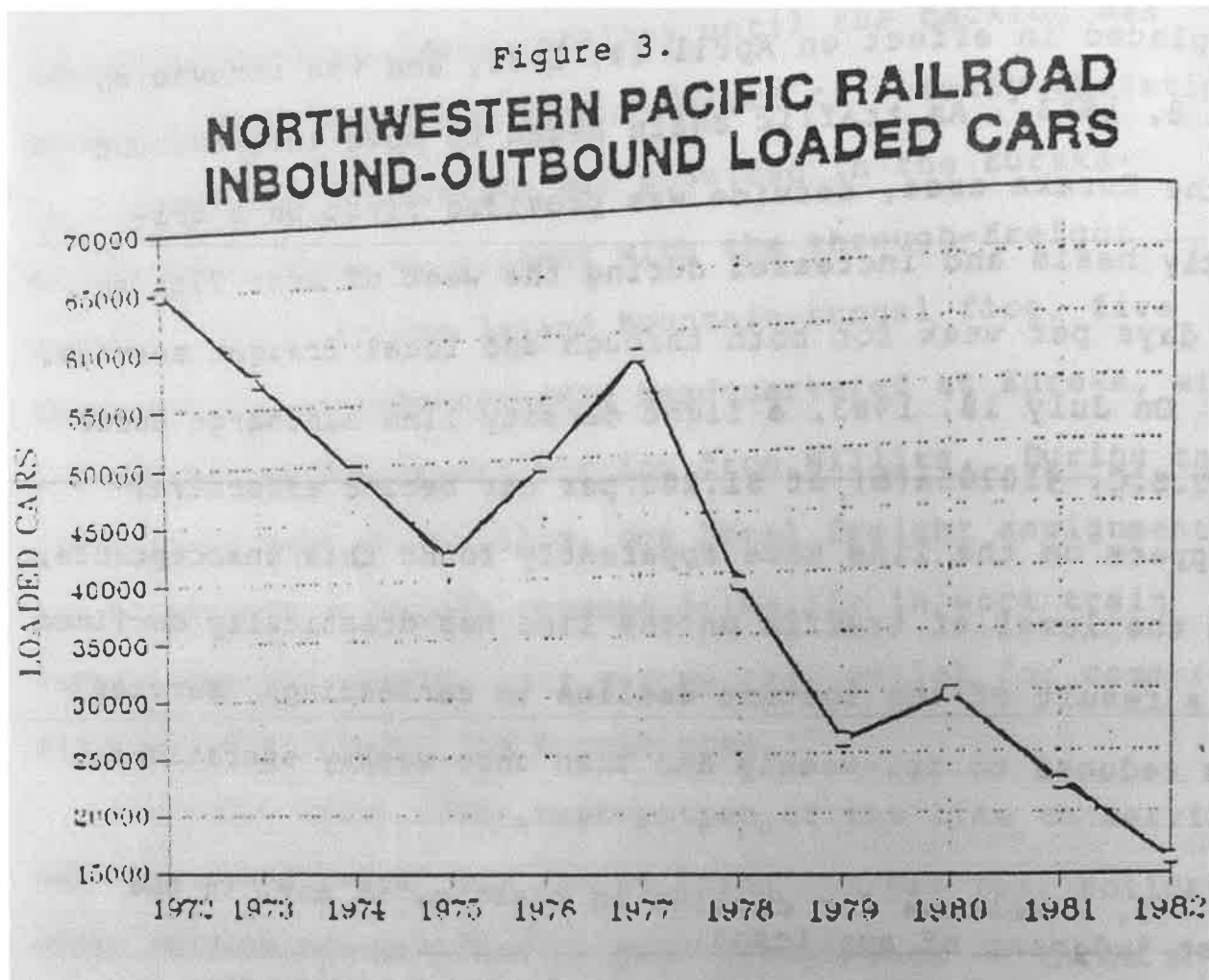


Fig 13. Rail Traffic Decline, NWP Application to Abandon, *supra*, at p. 22.

Sept. 11, 1983. Recall that NWP in reaction to the January and March 1983 slides embargoed the line. NWP's embargo, after litigation, was lifted but NWP imposed a \$1200 surcharge, which although also challenged, further dramatically reduced use of the line. By application dated September 1, 1983, NWP sought ICC authorization to abandon the NWP line from MP 142.5 (Outlet Station) north. Then on September 11, 1983, tunnel 12 (located at Longvale, just north of Willits) experienced a fire, rendering the railroad inoperable north of Willits.<sup>54</sup> NWP again halted service, which was resumed by court order in March 1984.<sup>55</sup> Meanwhile, NWP's abandonment application was placed on hold pending preparation of an EIS (*see note 1 supra*).

<sup>54</sup> Wesley, "Northwestern Pacific Railroad and Its Successors," 6.

<sup>55</sup> "Abandonment Items," *Trains Magazine*, Sept. 1983, at 22.

### The Denouement: Part One (Eureka Southern)

Where there is a will, there is a way. Stymied at embargoes, surcharges and abandonments, SP/NWP accepted a proposal from a former employee (Bryan Whipple) to acquire (via one Whipple company) and lease (via another) the line north of MP 142.5, which Mr. Whipple renamed the Eureka Southern (ES). ICC authorized the acquisition over opposition in 1985. See note 1 *supra*.

ES officially opened on October 31, 1984.<sup>56</sup> In order to be successful, ES needed to attract business back from trucks. But redwood timber had mostly gone to local trucking companies, and ES was limited to Douglas fir, and discounts to attract wood chips, rocks and sand.<sup>57</sup> ES instituted the popular North Coast Daylight (NCD) excursion train (fig. 14), but on the last run of NCD's season in 1985, the excursion was halted at Woodman Creek due to a landslide.<sup>58</sup> Great Western Tours, which financed the NCD, went into financial decline and ultimately bankruptcy. Other related bankruptcies followed, including ES in 1986.<sup>59</sup> Some excursion service continued. However, tunnel fires recurred,<sup>60</sup> including another fire at tunnel 11, which shut down the line for 13 days while ES constructed a "shoofly" bend around the hillside that had housed that tunnel. An NCD train was the first to use the shoofly. Excursion services were finally terminated in 1990, due to FRA's determination that the track no longer met

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<sup>56</sup> "Eureka Southern Rolls Thursday," Ukiah Daily Journal, Oct. 31, 1984, at 2 (<https://www.newspapers.com/image/992721>)

<sup>57</sup> Don Bain, "Eureka Southern Inaugurates Willits-Eureka Freight Operations" Pacific Rail News, Feb. 1985 at 8; Wilson, Burr, "Eureka Southern," CTC Board, Sept. 1985, at 31.

<sup>58</sup> Kirchanski, Jon, "Engineer Work on the Eureka Southern," Interview by Josh Buck, November 11, 2017.

<sup>59</sup> S. Hunter, "Eureka Southern's Rocky Road to Northern California," Passenger Train Journal, August 1988, at 34-35.

<sup>60</sup> E.g., "Tunnel Fire Closes Down Eureka Southern," Ukiah Daily Journal, Nov. 6, 1988, at 12 ([https://www.newspapers.com/image/?clipping\\_id=598223327](https://www.newspapers.com/image/?clipping_id=598223327)) (tunnel 18 fire on Nov. 5) (the walls of tunnel 18 are solid rock which resisted collapse).



passenger standards.<sup>61</sup> It was officially announced in *Trains Magazine* in March 1992 that the NCRA would purchase ES, which had been bankrupt for five years.<sup>62</sup>



Fig. 14. North Coast Daylight Excursion at Fort Seward with engineer Jon Kirchanski leaning out the window of Eureka Southern No. 32, c. 1985. The depot still stands, but unfortunately has significantly deteriorated from the appearance in this picture. Photographer unknown, from collection of J. Buck.

#### The Denouement: Part Two (California's NCRA)

Although the State adopted legislation creating the NCRA in 1989, the Governor vetoed funding to acquire the bankrupt ES assets, or to repair it.<sup>63</sup> By 1992, the

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<sup>61</sup> "Tunnel Troubles," *Trains Magazine*, December 1987, at 10; "Lights Out," *Trains Magazine*, Sept. 1990, at 11.

<sup>62</sup> "Eureka Southern Sold," *Trains Magazine*, March 1992, at 18.

<sup>63</sup> Dan Hauser, "Saving a Doomed Railroad, interview by J. Buck, Nov. 12, 2014. (Mr. Hauser was one of the architects/creators of NCRA, see note 1 *supra*.)

State had appropriated sufficient funds for acquisition of the ES, and acquisition was completed pursuant to the STB authorization discussed on p. 1 *supra*. Efforts to attract private capital (mainly from shippers) sufficient to operate without further loss proved impossible.<sup>64</sup> By 1995, a 1995 Cal Trans study suggested the northern portion of the line was no longer “a critical component” for the area transportation system or area economy.<sup>65</sup>

SP had leased the south half of old NWP (MP 142.5 at Willits to Schellville) to California Northern Company (CFNC) in 1993.<sup>66</sup> This arrangement lasted three years. CFNC reportedly found the line a “maintenance headache.”<sup>67</sup> Effective July 1, 1996, NCRA (Willits segment) and NWPRA (remaining segments) bought out the south half of the NWP for \$27 million.

Toward the end of 1996, NCRA’s management felt the railroad was breaking even, but due to speed limits on the track, traversing Scotia to Willits took 12 hours.<sup>68</sup> Then heavy rain closed the line north of Willits, causing \$ 5 million in damage, and tunnel 37 near McCann collapsed. NCRA nonetheless embarked on repairs, but

“since the trains weren’t running, the company could not afford overtime pay; repair crews worked only 40 hours a week. The solution—keeping the line through the Eel River Canyon closed from December 28 until March 12—only worsened the problem, sending the railroad further into debt from lost business. Just another Winter in the Canyon...though the track gangs have scarcely had time to scrape last winter’s mud off their shoes, the National Weather Service is predicting another wet winter in northern California, with the possibility of the worst flooding in a decade. At times NWP’s survival seems so tenuous that every car making it from Eureka to Schellville

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<sup>64</sup> John Woolley, “The Final Years of the NWP,” Interview by J. Buck, Nov. 14, 2014.

<sup>65</sup> Transportation Planning Program of Caltrans, Evaluation of the North Coast Railroad: Contributions to the Regional Economy and to the Transportation Network, August 1, 1995.

<sup>66</sup> “Passenger Service Ahead for Railroad,” The Press Democrat, Sept. 13, 1998, at 9 (<https://www.newspapers.com/image/311856326>).

<sup>67</sup> “Northwestern Pacific to Return,” Trains Magazine, Aug. 1996, at 21.

<sup>68</sup> Hauser interview, *supra*.



becomes a symbol of perseverance, overcoming an impossible landscape one more time.”<sup>69</sup>

Mother Nature was even more consequential for NCRA’s operations in 1998, in the form of an El Nino event.<sup>70</sup> The final train run in Eel River Canyon was in February of that year. Train engineer Nick Mitchell and conductor Gary Kittleson were headed south near Island Mountain during a horrific storm when a major slipout occurred farther up the railroad from their location. The crew left their load of timber and backtracked, not a moment too soon, for another slipout occurred north of their prior location, cutting off rail access to the cars left behind.<sup>71</sup> The stranded cars of NCRA’s last revenue train in the Canyon are there to this day. See fig. 15.

Fig 15.

Stranded cars at Island Mountain from the last revenue train in Eel River Canyon. J. Buck, 2019.



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<sup>69</sup> "Northwestern Pacific's Undying Spirit," *Trains Magazine*, December 1997, at 51.

<sup>70</sup> M.W. Jones, "El Nino-spawned Storms Slam California," *Trains Magazine*, May 1998, at 21.

<sup>71</sup> J. Glionna, "The Ghost Train to Nowhere," *Los Angeles Times*, May 14, 1999, at 1 (<https://www.latimes.com/archives/la-xpm-1999-may-14-mn37113-sotry.html>) (stranded cars held \$500,000 worth of redwood).

Lacking funds, maintenance-of-way crews were laid off, and NCRA/NWP's office staff, including Executive Director Hauser, quit on 28 July 1998. Mr. Hauser explained that "the beleaguered railroad is broke...NWP is \$6 million in debt to contractors and suppliers, most of it from \$23 million in storm damage from winter storms in 1993, 1995, and 1997."<sup>72</sup> The LA Times reported that a federal audit (by FEMA) triggered by poor accounting practices on the part of NCRA (and FEMA skepticism of funding multiple rounds of repairs) was holding up some \$14 million in repair funds (\$10 million FEMA and \$4 million in other federal funds administered by California).<sup>73</sup> NCRA nonetheless made an effort to repair the line in 1998, but repairs "were done quickly and sloppily,"<sup>74</sup> and FRA after inspection shut down the entire line. See p. 2 supra.<sup>75</sup> The line by this time was reportedly regarded as "the most expensive stretch of track to maintain in North America."<sup>76</sup>

There has been no revenue freight rail operation north of Windsor since the December 1998 FRA embargo. One train was allowed to pick up 28 cars at the south end.<sup>77</sup> As already noted, Skunk Railroad operates passenger excursion equipment on roughly a mile of NCRA trackage at Willits.

Pursuant to STB authority discussed at p. 3 supra, in early 2001 NCRA leased the entire line to Northwestern Pacific Railway Co. LLC (NWPY), controlled by John Darling (Mr. Darling also controlled Rail-Ways, a company which went bankrupt operating the line earlier for NCRA). However, NWPY lasted on the line only a few months before ceasing operations after disputes over payments (or

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<sup>72</sup> "Northwestern Pacific," *Trains Magazine*, Nov. 1998, at 3. By this point, NCRA operated the line d/b/a NWP.

<sup>73</sup> J. Glionna, supra. FRA says NCRA was seeking the money for repairs to damage from 1995, 1996 and 1998 and that FEMA working with FRA in the end "agreed to make" only \$1 million available. 63 Fed. Reg. 67976 (Dec. 9, 1998).

<sup>74</sup> Hauser Interview, supra.

<sup>75</sup> The line is reportedly "the first rail line in U.S. history to be shut down by the federal government for chronic safety hazards." J. Glionna, supra.

<sup>76</sup> J. Glionna, supra.

<sup>77</sup> "Northwestern Pacific," *Trains Magazine*, Feb. 2000, at 25.



lack thereof) for rehabilitation and maintenance. Between 2001 and 2006, there was no service on the line. Then, pursuant to STB authority discussed at p. 4, supra, in 2006 NCRA leased the line (per a contract styled an “Agreement for the Resurrection of Operations on the Northwestern Pacific Railroad Line and Lease”) with Northwestern Pacific Railroad Company (NWPCo), headed by John Williams. NWPCo and NCRA convinced the State to make available approximately \$42 million in funding to restore the old NWP line as far north as Windsor.<sup>78</sup> As indicated on p. 3, FRA lifted its emergency embargo from MP 62.9 (near Windsor) south in 2011. Most freight rail is between Napa and Petaluma. SMART operates passenger commuter on portions of the line, and aspires, after rehabilitation to extend passenger services as far north as Cloverdale, and has received STB authorization to take over freight rail obligations on that segment as well.<sup>79</sup> This is consistent with potential extension of freight service, someday, to Cloverdale.



Fig. 16. Current (August 2020) condition of Abbott Creek crossing, at north edge of MP 201 mud glacier. Track is buried from the south end of the crossing over the entire slide zone. The track rests on a pipe installed in an unsuccessful effort to drain the glacier. The pipe rests on an old NWP gondola car. Photo by J. Buck, Aug. 2020

The Humboldt Bay Harbor, Recreation and Conservation District (“Harbor District”) commissioned a “concept level” study of various rail alternatives to serve Humboldt Bay. The study [“Humboldt Bay Alternative Rail Corridor Concept Level Construction Cost and Revenue Analysis, Final Report,” August 22, 2013 (“Final Report”)] is available on the Harbor District’s website (<http://humbolddbay.org/documents>, click on Humboldt Rail Analysis Final 2013). The study examined five alternative alignments (with variations) as well as reconstruction of the existing NCRA alignment. Two of the east-west alternatives emanated from proposals dating from 1909 (attributed to Jess

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<sup>78</sup> Woolley interview, supra.

<sup>79</sup> Sonoma-Marín Area Rail Transit District – Acquisition and Operation Exemption – North Coast Railroad Authority, FD 36481, served Feb. 18, 2021.

Lentell<sup>80</sup>). Two additional east-west alignments (one through Blue Lake based on A&MR, and one through Carlotta initially along the Carlotta Branch), and a modification of the Eel Canyon route were also examined. The report identified construction challenges for each “new” route, finding that each carried an estimated capital cost in excess of \$1 billion. In contrast, fixing the existing NCRA route was estimated to cost around \$600,000,000. See Final Report at p. 18. The report indicated that all the alternatives (including the existing alignment) shared similar construction and maintenance issues, all depended on construction of additional port infrastructure in order to attract requisite business levels, and even so faced serious competition for the requisite rail traffic from other West Coast Ports. The report concluded that investment in any rail alternative to serve Humboldt Bay “is likely to be both high cost and high risk.” Final Report at 37.

### Recent Developments

In July 2017, the California State Transportation Commission called upon NCRA to draft a proposal for abandonment of the long-embargoed north end.<sup>81</sup> In 2018, the California legislature adopted, and the Governor signed, legislation (SB 1029) amending NCRA’s organic act which provides, subject to a study by the California Transportation Agency in consultation with the Resources Agency, for abandonment/railbanking the north end of the line and cooperation with SMART in the south. See page 6 *supra*. The report (“Assessment of the North Coast Railroad Authority and Viability of a Great Redwood Trail”) was released in late 2020 to the public and appears at <https://calsta.ca.gov/subject-areas/reports>. On the basis of the legislation, the report, the history of the NWP line, and the public interest, NCRA is moving forward with an effort to obtain effective STB authority for abandonment and railbanking of the line from Willits to end of line in the north, and for transfer of rail assets and operating rights to SMART for the portion south of the Mendocino/Sonoma County line (roughly Cloverdale).

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<sup>80</sup> See, e.g., <https://cdnc.ucr.edu/?a=d&d=RBN19090924.2.8&e=-----en--20--1--txt-txIN-----1> (1909 newspaper report of possible route). Lentell was, among other things, an early Humboldt County cartographer.

<sup>81</sup> Hank Sims, “State Transportation Commission Raises Eyebrow at North Coast Railroad Authority Finances, Asks Perennially Beleaguered Agency to Prepare ‘Shutdown Plan,’” *Lost Coast Outpost*, July 2017 <https://lostcoastoutpost.com/2017/jul/3/state-transportation-commission-raises-eyebrow-nor/>





Fig. 17.  
One of  
several  
stranded  
flatcars with  
rail for  
repairs,  
Kekewaka  
Creek (near  
Island  
Mountain).  
Photo by J.  
Buck, Aug  
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## Exhibit P – Major Slides

| <i><b>Milepost(s)</b></i> | <i><b>Name</b></i>             | <i><b>Type of Earth Movement</b></i> | <i><b>Length</b></i> | <i><b>Description</b></i>                                                                                                                                                                                                                                                                                         |
|---------------------------|--------------------------------|--------------------------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 165.7 - 169.9             | Grannell Slide                 | Slide                                | -                    | A major slide which required frequent contouring to keep drainage water diverted, which prevented saturation in slide material.                                                                                                                                                                                   |
| 167.1 - 167.35            | Berger Creek Slide             | Slide                                | 1,000 feet           | 200 - foot sink area, followed by 650 - foot hump, and then by a 150 - foot sink. Required weekly resurfacing, average track movement was approximately 2-3 inches down and 4-5 inches out of line each week.                                                                                                     |
| 169.5                     | Unnamed                        | Slide and Sink                       | 150'                 | Required track surfacing 2-3 times a week and the average weekly movement was 3-4 inches down and 2-3 inches out line.                                                                                                                                                                                            |
| 170.3                     | Unnamed                        | Sink                                 | 150'                 | Required surfacing at least once per week and its average movement per week was 1-2 inches out of line.                                                                                                                                                                                                           |
| 171.2                     | Unamed                         | Sink                                 | 100'                 | Average movement was 4-5 inches down and 4-5 inches out of line on a weekly basis, surfacing required 3-4 times per year.                                                                                                                                                                                         |
| 172.7 - 172.8             | Tunnel No. 19 Slide            | Slide                                | -                    | Loose unstable rock falls from the spot where tunnel no. 19 used to be.                                                                                                                                                                                                                                           |
| 179.8                     | Unnamed                        | Sink                                 | 120'                 | Required resurfacing at least once per week.                                                                                                                                                                                                                                                                      |
| 182.3 - 182.4             | Unnamed                        | Sink(s)                              | -                    | Average weekly movement is 1-2 inches down and 1 inch out of line.                                                                                                                                                                                                                                                |
| 182.6                     | Unnamed                        | Mudslide                             | -                    | Caused culvert to be plugged during winter months which created washout potential and contouring was required during the summer.                                                                                                                                                                                  |
| 183.25 - 183.95           | The Bell Springs Sink          | Sink                                 | 430'                 | Winter storms caused this location to slipout in sections which vary in length anywhere from 40' to 240' long and 6' - 30' deep.                                                                                                                                                                                  |
| 186.8                     | Unnamed                        | Sink                                 | 40'                  | Required resurfacing 2-3 times per week and has an average weekly movement of 3-4 inches down and 2-3 inches out of line.                                                                                                                                                                                         |
| 187.0 - 187.2             | Unnamed                        | Sink(s)                              | Each 75'             | Two sinks, each surfaced 2-3 times per week and had an average weekly movement of 3-4 inches down and 2-3 inches out of line.                                                                                                                                                                                     |
| 187.3                     | The Hawkins Sink               | Sink                                 | 150'                 | A sink which had weekly movement of 3-4 inches down and 2-3 inches out of line.                                                                                                                                                                                                                                   |
| 188                       | The 188 Sink                   | Sink                                 | 150'                 | Required weekly surfacing 1-2 times per week and average weekly movement is 1-2 inches down and 1-2 inches out of line.                                                                                                                                                                                           |
| 188.7-188.8               | The Oops Sink and Goddard Sink | Sink(s)                              | -                    | Weekly movement is about 1-2 inches down and 1-2 inches out of line, which required surfacing 1-2 times per week.                                                                                                                                                                                                 |
| 189. - 189.25             | The Ramsey Sink                | Sink                                 | 1,200'               | Track moves towards the river about 3 to 4 feet each year, which required linking it back toward the hillside each summer.                                                                                                                                                                                        |
| 190.25                    | The 190 1/4 Slide              | Slide                                | 400'                 | A major trouble spot located on an active mud glacier that moves all year long - sometimes as much as 6 to 12 inches per day.                                                                                                                                                                                     |
| 194.5                     | The Island Mountain Tunnel     | Bulging                              | -                    | Earth movement at the east end of the tunnel causes a bulging of the walls.                                                                                                                                                                                                                                       |
| 195.9 - 196.1             | Unnamed                        | Slide and sink                       | -                    | Work forces installed rails and pole pilings during the summer of 1982 to hold the shoulder of this slide/sink in place. They temporarily slowed the movement but then sunk and slipped away from the track as much as 20 feet by the end of the 1982 to 1983 winter. The same poles/rail are now at river level. |
| 201 - 201.2               | The 201.0 Slide                | Slide                                | 900'                 | A major slide about 900 feet wide and 3/4s of a mile long. The top of the slide is some 1,600 feet higher than the top of the rail. It is a mass which contains some 18 million cubic yards of material.                                                                                                          |
| 201.45 - 221.2            | Unnamed                        | Sink(s)                              | -                    | Between these two mileposts there are 34 sinks ranging in length from 50 to 120 feet. All have average weekly movement of 1-4 inches down and 1-4 inches out of line and required surfacing 1-3 times per week.                                                                                                   |



|                |                   |              |            |                                                                                                                                                                                                                        |
|----------------|-------------------|--------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 222            | Unnamed           | Scaling Rock | 300'       | Scaling rocks continually onto the track and was a constant clean-up requirement.                                                                                                                                      |
| 222.2 - 222.3  | The Denmark Slide | Slide        | 600'       | The slide goes under the track which causes a sink that requires raising 2-3 times per week                                                                                                                            |
| 222.4          | Unnamed           | Shale Slide  | 400'       | Was cleaned once per week.                                                                                                                                                                                             |
| 222.7          | Unnamed           | Hump         | 400'       | Track becomes humped about 4 feet over a distance of 400 feet.                                                                                                                                                         |
| 222.9 - 226.9  | Unnamed           | Sink(s)      | 59' - 150' | There are seven sinks throughout this mileage which range in length from 59 to 150 feet long and all had average weekly movement of 2-5 inches down and 2-5 inches out of line. Required surfacing 1-3 times per week. |
| 232.3 - 232.45 | The McCann Slide  | Slide        | -          | Major slide which was kept under control but still required the toe of the slide to be cut back yearly as it would crowd the track.                                                                                    |
| 239.0 - 244.03 | Unnamed           | Sink(s)      | 75' - 120' | There are four sinks within this mileage and all had average weekly downward movement of 1-4 inches and two also have slide movement of 2-3 inches. Surfacing was required weekly.                                     |
| 244.2 - 244.3  | The 244 Sink      | Sink         | 780'       | Contouring of the slide area was required annually with drainage ditches requiring cleaning on a monthly basis. Track is surfaced weekly as average weekly movement is 1-1.5 inches down and 2 inches out of line.     |
| 251.8 - 252.7  | Unnamed           | Sink(s)      | 120' each  | There are two sinks in this mileage which had weekly movement of 1.5 inches down and 2 inches out of line.                                                                                                             |
| 256 - 258.5    | The Scotia Bluffs | Slide        | -          | In this area the railroad is perched on a narrow ledge between the Eel River and the near vertical hillside. Heavy slides off the Bluffs were a constant hazard.                                                       |
| 256.3 - 256.8  | Unnamed           | Slide(s)     | 200-250'   | Three slides occur within this mileage and extend as far as 20 feet over the rail.                                                                                                                                     |

| Description                               | MP Location | Segment |
|-------------------------------------------|-------------|---------|
| Rail car                                  | 205.7       | 28      |
| Rail waste                                | 207.9       | 29      |
| Rail car                                  | 208.9       | 29      |
| Metal waste                               | 209.0       | 29      |
| Metal waste                               | 209.0       | 29      |
| Old culvert                               | 212.1       | 29      |
| Old culvert                               | 212.2       | 29      |
| Old culvert                               | 212.3       | 29      |
| Rail waste                                | 216.4       | 30      |
| Rail waste                                | 216.4       | 30      |
| Rail car                                  | 216.4       | 30      |
| Grease box                                | 220.3       | 30      |
| Rail car                                  | 224.9       | 30      |
| Old culverts                              | 224.9       | 30      |
| Rail car                                  | 232.2       | 32      |
| <b>RTT Northern Section</b>               |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Korblex Branch</b>                 |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Carlotta Branch</b>                |             |         |
| No rail debris was found in this section  | NA          | NA      |
| <b>RTT Samoa Branch</b>                   |             |         |
| No rail debris was found in this section. | NA          | NA      |

Notes: MP = Milepost; NA = Not Applicable; RTT = Rail to Trail; RWT = Rail with Trail  
Source: Compiled by Ascent Environmental in 2020.

Table C-8 Landslides and Slope Failures

| Segment                     | MP Location | Approximate Length (feet) | Description                                                           |
|-----------------------------|-------------|---------------------------|-----------------------------------------------------------------------|
| <b>RWT Southern Section</b> |             |                           |                                                                       |
| NA                          | NA          | NA                        | No landslides or slope failures have been documented in this section. |
| <b>RTT Southern Section</b> |             |                           |                                                                       |
| 8                           | 90.4        | 150                       | A downslope slide is undermining the tracks.                          |
| 8                           | 90.6        | 20                        | A downslope slide is undermining the tracks.                          |
| 8                           | 90.7        | 100                       | Area of soil creep and erosion.                                       |



| Segment                             | MP Location | Approximate Length (feet) | Description                                                                                         |
|-------------------------------------|-------------|---------------------------|-----------------------------------------------------------------------------------------------------|
| 8                                   | 92.8        | 30                        | Tracks are covered in debris.                                                                       |
| 8                                   | 93.6        | 150                       | Tracks are buried beneath a large slide.                                                            |
| 8                                   | 93.7        | 75                        | Tracks are distorted and sinking.                                                                   |
| 8                                   | 94.5        | 100                       | Tracks are buried beneath a large slide.                                                            |
| 16                                  | 126.4       | 50                        | Uphill slide has deposited onto the tracks.                                                         |
| 16                                  | 126.5       | 300                       | Area of soil creep and erosion.                                                                     |
| 16                                  | 126.7       | 50                        | Rail bed is undermined.                                                                             |
| 16                                  | 126.7       | 150                       | Uphill slide has undermined the tracks.                                                             |
| 16                                  | 128.1       | 2,640                     | Uphill slide with tracks distorted and railbed undermined.                                          |
| 16                                  | 130.1       | 250                       | Soil creep on a grass slope.                                                                        |
| <b>RTT Eel River Canyon Section</b> |             |                           |                                                                                                     |
| 22                                  | 156.9       | 110                       | A cutslope landslide crosses the tracks.                                                            |
| 23                                  | 164.9       | 300                       | A large landslide has deposited a material on railroad bench.                                       |
| 23                                  | 165.8       | 30                        | The railroad bench has slumped slightly resulting in tracks being suspended.                        |
| 24                                  | 167.1       | 570                       | Large debris flow.                                                                                  |
| 24                                  | 167.3       | 620                       | A large debris flow on the other side of the river has caused undercutting of the corridor.         |
| 24                                  | 167.7       | 520                       | Large earthflow has covered the rail with debris and rocks; Rails twisted. Outboard slope unstable. |
| 24                                  | 168.2       | 300                       | Multiple active debris slides or flows across corridor.                                             |
| 24                                  | 169.5       | 385                       | Intermittent debris slides and rock falls deposited on tracks.                                      |
| 24                                  | 169.7       | 50                        | Rock slide at tunnel entrance deposited on tracks.                                                  |
| 24                                  | 169.9       | 2,100                     | Intermittent rock/debris slides deposited on tracks.                                                |
| 24                                  | 170.0       | 216                       | Large hillslope failure initiated by upslope road.                                                  |
| 24                                  | 170.1       | N/A                       | Three small debris slides initiated by upslope road have deposited on tracks.                       |
| 24                                  | 170.5       | 60                        | Debris slide with deposit covering tracks.                                                          |
| 24                                  | 171.0       | 97                        | Debris slide with deposit covering tracks.                                                          |
| 24                                  | 171.1       | 55                        | Debris slide with deposit covering tracks.                                                          |
| 25                                  | 171.5       | 145                       | Upslope debris slide with minor deposition on tracks.                                               |
| 25                                  | 171.7       | 220                       | A large upslope debris slide has deposited on tracks.                                               |
| 25                                  | 171.7       | 215                       | A large upslope debris flow completely covers tracks.                                               |
| 25                                  | 174.1       | 260                       | Upslope debris slides along alignment with stream undercutting.                                     |
| 25                                  | 175.1       | 110                       | Upslope debris slides deposited onto rail tracks.                                                   |
| 25                                  | 175.1       | 25                        | Upslope debris slides deposited onto rail tracks.                                                   |
| 25                                  | 175.2       | 50                        | Upslope debris slides deposited onto rail tracks.                                                   |
| 25                                  | 175.2       | 215                       | Upslope debris slides deposited onto rail tracks.                                                   |
| 25                                  | 175.3       | 670                       | Long section of upslope debris slide deposition onto rail tracks.                                   |
| 25                                  | 175.9       | 100                       | Upslope debris slide deposited on tracks.                                                           |
| 25                                  | 176.0       | 100                       | Upslope failure with debris on the tracks leading to the tunnels south entrance.                    |

## Appendix C

| Segment | MP Location | Approximate Length (feet) | Description                                                                                                                                                                                                     |
|---------|-------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 25      | 176.4       | 110                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 176.6       | 220                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 176.7       | 120                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 177.7       | 275                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 177.9       | 190                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 179.0       | 150                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 25      | 179.1       | 110                       | Upslope debris slide deposited on tracks.                                                                                                                                                                       |
| 26      | 179.2       | 175                       | A large upslope debris slide has completely covered the tracks and is blocking the southern entrance to Tunnel 22.                                                                                              |
| 26      | 180.6       | 30                        | An upslope slide has eroded through the track.                                                                                                                                                                  |
| 26      | 180.6       | 95                        | Upslope debris slides have deposited onto railroad tracks.                                                                                                                                                      |
| 26      | 180.7       | 140                       | Upslope debris slide has buried the tracks.                                                                                                                                                                     |
| 26      | 180.7       | 160                       | Earthflow terrain with deformed and distorted tracks.                                                                                                                                                           |
| 26      | 182.7       | 77                        | Earthflow deposits on the tracks.                                                                                                                                                                               |
| 26      | 183.1       | 390                       | Long section of upslope debris slides that have deposited material onto the tracks.                                                                                                                             |
| 26      | 183.1       | 160                       | A complex of an upslope debris slide and two downslope debris flows.                                                                                                                                            |
| 26      | 183.5       | 2,290                     | Active large earthflow complex with many slides depositing material on the tracks.                                                                                                                              |
| 26      | 183.8       | 100                       | Lower slope failure due to an active slump.                                                                                                                                                                     |
| 26      | 183.9       | 60                        | Upslope debris slide has deformed and undercut the tracks. The lower slope is also failing due to a large hillslope failure across river that has pushed the river into the hillslope below the rail alignment. |
| 26      | 183.9       | 139                       | Unstable slope area with lower slope failures and upslope gullies.                                                                                                                                              |
| 27      | 186.4       | 180                       | Upslope debris slide is covering tracks.                                                                                                                                                                        |
| 27      | 186.5       | 100                       | Upslope debris slide is covering tracks.                                                                                                                                                                        |
| 27      | 186.5       | 50                        | Lower slope failure from river undercutting.                                                                                                                                                                    |
| 27      | 186.6       | 275                       | Upslope debris slides have deposited onto tracks.                                                                                                                                                               |
| 27      | 186.9       | 262                       | Upslope earth flow terrain with debris flows and gullies that have eroded, undermined, and pushed tracks downslope.                                                                                             |
| 27      | 187.7       | 115                       | Upslope debris slide has deposited material on tracks.                                                                                                                                                          |
| 27      | 187.8       | 1,250                     | Long section of debris slides within earthflow terrain.                                                                                                                                                         |
| 27      | 188.0       | 280                       | Upslope debris slides in earthflow terrain have buried the rail alignment in places and caused track distortion. The lower hillslope is also failing due to river undercutting.                                 |
| 27      | 188.6       |                           | An upslope debris flow has covered the tracks.                                                                                                                                                                  |
| 28      | 190.2       | 160                       | An upslope debris flow has covered the tracks.                                                                                                                                                                  |
| 28      | 190.7       | 230                       | Lower hillslope failure has eroded into rail tracks and suspended the track in some areas.                                                                                                                      |
| 28      | 190.8       | 190                       | An earthflow has deformed the rail alignment.                                                                                                                                                                   |
| 28      | 193.4       | 55                        | Upper hillslope failure resulting in suspended and distorted tracks.                                                                                                                                            |
| 28      | 193.6       | 125                       | Upslope slide has deposited material onto rail tracks.                                                                                                                                                          |
| 28      | 193.9       | 340                       | Upper hillslope failure within earthflow complex has pushed tracks into the river.                                                                                                                              |



| Segment | MP Location | Approximate Length (feet) | Description                                                                                                                                                                             |
|---------|-------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 28      | 194.0       | 95                        | Upslope debris flow deposited material on tracks.                                                                                                                                       |
| 28      | 194.1       | 80                        | Upslope hillslope debris slide deposited onto tracks.                                                                                                                                   |
| 28      | 195.9       | 100                       | An active slump below the track is undermining the corridor.                                                                                                                            |
| 28      | 196.0       | 350                       | Track has been distorted in earthflow terrain.                                                                                                                                          |
| 28      | 197.4       | 225                       | Earthflow toe has buried and pushed rail tracks downslope.                                                                                                                              |
| 28      | 199.2       | 100                       | Upslope earthflow has deposited material on the tracks.                                                                                                                                 |
| 28      | 199.3       | 217                       | Earthflow has pushed and distorted the tracks downslope.                                                                                                                                |
| 28      | 200.7       | 200                       | Unstable active earthflow has buried tracks.                                                                                                                                            |
| 28      | 200.8       | 131                       | Upslope debris flow has deposited material on tracks. Tracks are buried and appear to be pushed downslope.                                                                              |
| 28      | 200.9       | 356                       | Railroad tracks are obscured and appear to be buried by former debris flow.                                                                                                             |
| 28      | 201.3       | 335                       | Large earthflow has pushed, distorted and buried tracks.                                                                                                                                |
| 28      | 201.4       | 70                        | Lower slope failure has eroded into rail alignment and suspended the outer track.                                                                                                       |
| 28      | 201.5       | 515                       | Large earthflow has completely buried and distorted rail track.                                                                                                                         |
| 28      | 202.3       | 200                       | Earthflow related upslope failure has pushed and distorted rail tracks downslope. Tracks look suspended in some places.                                                                 |
| 28      | 203.0       | 980                       | Large earthflow with multiple debris flows that have eroded the rail alignment and buried and distorted the rail tracks.                                                                |
| 28      | 203.7       | 375                       | A large active slide complex within earthflow terrain. There are multiple debris flows and slides upslope and downslope of the rail alignment. Rail tracks are suspended and distorted. |
| 28      | 203.8       | 280                       | Active failures have eroded back into the rail alignment causing rails to be suspended and undercut.                                                                                    |
| 28      | 204.3       | 530                       | Active failures above and below the tracks have caused the rails to be suspended and undercut.                                                                                          |
| 28      | 204.4       | 240                       | Cutbank rockslide has deposited onto tracks. No visible track distortion.                                                                                                               |
| 28      | 205.1       | 280                       | Upslope slide has deposited material on tracks.                                                                                                                                         |
| 28      | 205.4       | 320                       | Earthflow has pushed rail tracks downslope. Slide material deposited on tracks.                                                                                                         |
| 28      | 205.6       | 80                        | Upslope debris slide has deposited on tracks.                                                                                                                                           |
| 28      | 205.8       | 65                        | Upslope debris slide has deposited on tracks.                                                                                                                                           |
| 28      | 205.9       | 40                        | Upslope debris slide has deposited on tracks.                                                                                                                                           |
| 28      | 206.6       | 180                       | Active rotational slide has eroded into the corridor leaving tracks distorted and suspended.                                                                                            |
| 28      | 207.5       | 160                       | Upslope slide has eroded through rail alignment and distorted the tracks.                                                                                                               |
| 28      | 207.7       | 130                       | Upslope slide has eroded through rail alignment and distorted the tracks.                                                                                                               |
| 29      | 209.2       | 100                       | Discreet slumps along the rail corridor leave the corridor suspended and undulating.                                                                                                    |
| 29      | 209.8       | 150                       | Impounded water on inboard side has saturated the soil and is causing a localized block of corridor to slump.                                                                           |
| 29      | 210.2       | 70                        | Creeping slope has left tracks and ties suspended.                                                                                                                                      |
| 29      | 211.0       | 250                       | Track is distorted due to soil creep caused by poor drainage.                                                                                                                           |
| 29      | 211.7       | 75                        | Track is distorted due to soil creep caused by poor drainage. The slump could be affecting right abutment of a nearby bridge.                                                           |

| Segment | MP Location | Approximate Length (feet) | Description                                                                                                                                               |
|---------|-------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 29      | 212.1       | 200                       | Soil creep area has ripped tracks away from soil. Cutbank material is collapsing onto tracks in some locations.                                           |
| 29      | 212.2       | 100                       | Slope failure is covering tracks and has buried a stream crossing culvert.                                                                                |
| 29      | 212.6       | 50                        | Cutslope failure has covered the tracks.                                                                                                                  |
| 29      | 212.7       | 30                        | Cutslope failure has covered the tracks.                                                                                                                  |
| 29      | 213.1       | 20                        | Cutslope failure has covered the tracks.                                                                                                                  |
| 29      | 213.6       | 750                       | Landslide has buried tracks completely and narrowed the width of bench dramatically. Springs form gullies in various locations.                           |
| 29      | 214.3       | 100                       | Tracks have been distorted by soil creep. Soil conditions are over saturated and has affected retaining wall.                                             |
| 29      | 215.5       | 200                       | An active deep-seated landslide has left rails suspended.                                                                                                 |
| 30      | 218.3       | 40                        | A soil creep feature has resulted the outboard track being suspended, inboard track is in place but slightly distorted and shows sign of strain.          |
| 30      | 218.3       | 200                       | A landslide has deposited a large amount of material on railroad bench.                                                                                   |
| 30      | 219.0       | 120                       | A landslide has deposited material on railroad bench for a width of 100 feet, combined with additional smaller slides and a fill-slope failure.           |
| 30      | 219.9       | 50                        | A landslide has deposited material on railroad bench.                                                                                                     |
| 30      | 220.0       | 200                       | A large, deep seated landslide has completely buried and dislodged the railroad track.                                                                    |
| 30      | 220.2       | 60                        | A slump feature has left tracks suspended.                                                                                                                |
| 30      | 220.4       | 300                       | A slump feature has left tracks suspended.                                                                                                                |
| 30      | 220.9       | 200                       | A slump feature has left tracks suspended.                                                                                                                |
| 30      | 221.2       | 300                       | A slump feature has left tracks suspended and slightly bent downslope.                                                                                    |
| 30      | 222.2       | 150                       | A slump feature has left tracks suspended and twisted.                                                                                                    |
| 30      | 222.3       | 210                       | Combination of a 60 foot slide and 150 foot slump.                                                                                                        |
| 30      | 222.6       | 120                       | A cutbank slide has deposited material on the tracks.                                                                                                     |
| 30      | 222.7       | 225                       | The railroad bench has slumped resulting in tracks being suspended.                                                                                       |
| 30      | 223.1       | 400                       | A landslide has deposited material on the tracks.                                                                                                         |
| 30      | 224.3       | 80                        | The railroad grade appears to have slumped and backtilted resulting in tracks being twisted and slightly suspended.                                       |
| 30      | 224.5       | 140                       | A landslide has deposited material on the railroad grade. Multiple scarps exist downslope of the railroad tracks.                                         |
| 31      | 226.5       | 60                        | A landslide has deposited material on railroad bench. The railroad bench appears intact but there is no bypass around this feature.                       |
| 31      | 226.7       | 70                        | A landslide has deposited material on railroad bench.                                                                                                     |
| 31      | 227.8       | 60                        | A landslide has deposited material on railroad bench.                                                                                                     |
| 32      | 231.4       | 15                        | A small landslide has deposited material on railroad bench.                                                                                               |
| 32      | 231.7       | 300                       | A landslide slump feature is undermining the railroad bench with tension cracks observed underneath the tracks.                                           |
| 32      | 231.9       | 15                        | A small landslide has deposited material on railroad bench. The railroad bench appears intact although several landslide benches were observed downslope. |



| Segment                                          | MP Location | Approximate Length (feet) | Description                                                                                                       |
|--------------------------------------------------|-------------|---------------------------|-------------------------------------------------------------------------------------------------------------------|
| 32                                               | 232.0       | 150                       | A landslide has deposited material on railroad bench.                                                             |
| 32                                               | 234.1       | 50                        | A landslide has deposited large and medium sized boulders on railroad bench.                                      |
| 33                                               | 236.7       | 60                        | A landslide has deposited material on railroad bench, railroad bench appears intact.                              |
| <b>RTT Northern Section</b>                      |             |                           |                                                                                                                   |
| 33                                               | 237.1       | 40                        | A landslide has deposited material on railroad bench for a width of about 40 feet, railroad bench appears intact. |
| 34                                               | 244.6       | 5,075                     | A Large unstable slide and cliff make the corridor impassible to the south.                                       |
| 34                                               | 244.9       | 30                        | Small translational slide above corridor has deposited material on tracks.                                        |
| 35                                               | 247.1       | 50                        | The hillside below the track is slumping causing sever erosion.                                                   |
| 38                                               | 256.7       | 163                       | Active translational slide with material covering tracks.                                                         |
| 38                                               | 257.0       | 530                       | Active translational slide with material covering tracks.                                                         |
| 39                                               | 262.9       | 50                        | A small, active slide is resting just uphill from track.                                                          |
| 43                                               | 271.8       | 50                        | A small area of soil creep.                                                                                       |
| <b>RTT Carlotta, Samoa, and Korblex Branches</b> |             |                           |                                                                                                                   |
| NA                                               | NA          | NA                        | No landslides or slope failures have been documented in this section.                                             |

Notes: MP = Milepost; NA = Not Applicable; RTT = Rail to Trail; RWT = Rail with Trail.

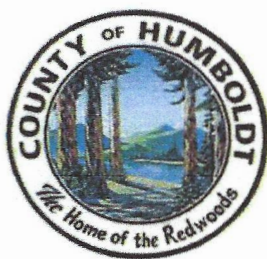
Source: Compiled by Ascent Environmental in 2020.

Exhibit E  
Combined ER/HR  
(on file under Environmental Comments  
for AB 1305X since March 9, 2021)

Addendum  
Comments Rec'd as of 5/13/2021

Humboldt County  
Rails to Trails Conservancy  
Friends of the Eel River





**BOARD OF SUPERVISORS  
COUNTY OF HUMBOLDT**

825 5th Street, Suite 111, Eureka, CA 95501-1153  
Telephone (707) 476-2390 Fax (707) 445-7299

May 11, 2021

Mitch Stogner, Executive Director  
North Coast Railroad Authority  
419 Talmage Road, Suite M  
Ukiah, CA 95482

Subject: Proposed Railbanking of North Coast Railroad Authority's Line from Willits to End of Line in Samoa, Korblex, Korbel, and Carlotta; Surface Transportation Board Docket No. AB 1305

Dear Mr. Stogner:

The Humboldt County Board of Supervisors supports preserving the North Coast Railroad Authority's ("NCRA's") railroad right-of-way through railbanking for interim trail use and subject to possible future reconstruction and reactivation of the right-of-way for rail service. NCRA's railroad right-of-way is an immensely valuable public resource and should remain dedicated for current and future transportation needs. The proposed action to file a railbanking application with the Surface Transportation Board is consistent with the land use plans and zoning regulations that apply to Humboldt County's jurisdiction.

We look forward to collaborating with NCRA and the successor agency on planning and implementing trail projects. We understand that the proposed Senate Bill SB-69 would mandate development of a master plan for the Great Redwood Trail. Public engagement early in the process will be critically important. In planning for the Great Redwood Trail within Humboldt County, it will be important to recognize the significant differences in context between the portion of the line from Scotia north to Samoa (the "coastal region") and the portion of the line south of Scotia along the Eel River to the county line near Alderpoint (the "interior region"). We expect that the near-term priority will be to develop trail segments linking cities and communities within the coastal region along Humboldt Bay, the Eel River Valley, and the Mad River. Developing trails within the more remote interior region will likely be a longer-term enterprise that will require significant planning and consultation with adjacent landowners to address geological instability and compatibility with adjacent land use.

Trails should be planned and designed with consideration for community values and priorities and the context of the surrounding landscape and land use. A key planning principle in developing trails and access points is to ensure compatibility with adjacent land use. Security, trespass, fire, drainage, dogs, traffic, parking, and other important issues will need to be addressed. Just because the railroad corridor is railbanked does not mean that trails should be developed along every segment. Suitability for trail development will need to be determined on a segment-by-segment basis. In some locations an alternative alignment for a trail will be preferred over the railroad corridor. In

addition, the purpose and design of the trail should fit the context. For example, trails that connect cities and smaller urban areas will likely be planned to have both transportation and recreational purposes, resulting in paved paths designed in accordance with engineering standards to accommodate bicycles and mobility devices. Trails through natural and undeveloped areas can often be planned for recreational use only, resulting in smaller unpaved paths.

Investment is needed to rehabilitate and maintain the railroad corridor where it is having an adverse impact on adjacent property or public trust resources. NCRA's railroad within Humboldt County has received little maintenance and repair since the 1990s. In many locations, deterioration of the rail prism and railroad infrastructure is increasing flood risks, contributing to drainage problems, creating potential safety and environmental hazards, discharging sediment to waterways, and creating potential nuisance conditions. The railroad along the Humboldt Bay shoreline has become critical coastal protection infrastructure; however, certain areas have suffered significant erosion and deterioration. The Great Redwood Trail represents a critical opportunity to leverage funding that can address these difficult issues while creating trails that provide substantial public benefit.

Finally, we ask that the California State Transportation Agency, NCRA, and NCRA's successor agency secure sufficient funding to ensure a robust public engagement process as planning for the Great Redwood Trail moves forward.

Please continue to coordinate with Hank Seemann, Public Works Deputy-Director (707-445-7741 or [hseemann@co.humboldt.ca.us](mailto:hseemann@co.humboldt.ca.us)) on trail-related matters in Humboldt County's jurisdiction.

Sincerely,



Virginia Bass, Chair  
County of Humboldt Board of Supervisors





March 25, 2021

Office of Environmental Analysis  
Surface Transportation Board  
Washington, DC

Re: NCRA Filing- Environmental and Historic Report - STB Docket #AB 1305

To Whom It May Concern:

On behalf of Rails-to-Trails Conservancy (hereafter, "RTC"), we are pleased to endorse and support the railbanking of the North Coast Railroad Authority ("NCRA") rail line from Willits north to the end of the line in Samoa, California.

We have reviewed the Environmental and Historic Reports which appear to be comprehensive and accurate. We agree with the assessment that railbanking this line for interim trail use will not result in any adverse effects on the environment or public health and safety. The line has been out of service since the FRA embargo in 1998, there are no shippers, NCRA plans no salvage activities or alteration of historic structures, and NCRA instead plans to "railbank" the entire line thus preserving it for use as the Great Redwood Trail and for possible future rail reactivation pursuant to 16 U.S.C. 1247(d).

Railbanking and conversion of this unused rail line to a trail would be the highest and best use of this scenic corridor. The proposed Great Redwood Trail along the NCRA right-of-way would support the growing regional trail network in Mendocino, Trinity and Humboldt counties, providing recreational and transportation opportunities as well as environmental and economic benefits to the adjacent communities. We at RTC believe that this proposed rail-trail has the potential to be one of the longest and most spectacular rail-trails in the country.

Thank you for your consideration of our comments.

Sincerely,

*Laura Cohen*

Laura Cohen  
Western Region Director  
Rails-to-Trails Conservancy

Cc: Charles H. Montange, counsel for NCRA





EI-30491

## FRIENDS OF THE EEL RIVER

*Working for the recovery of our Wild & Scenic River, its fisheries and communities.*

Tuesday, March 30, 2021

Office of Environmental Analysis  
Surface Transportation Board  
Washington DC

filed electronically

**RE: Docket No. AB-1305  
North Coast Railroad Authority – Abandonment Exemption – in Humboldt,  
Trinity, and Mendocino Counties, CA  
Combined Environmental and History Report**

Dear OEA staff,

Friends of the Eel River (FOER) takes a keen interest in the Environmental and History reports submitted by the North Coast Railroad Authority (NCRA) in support of the agency's proposed Abandonment Exemption for its rail lines north of Willits, CA. FOER has urged the NCRA to recognize and help to conserve the outstanding natural heritage of the Eel River canyon for decades. FOER very much appreciates the diligent work reflected in the Report.

**1. 49 C.F.R. 1105.7(e)(1): Proposed Action and Alternatives:**

FOER strongly encourages the STB to include all of the 175 miles of rail line north of Willits described by the NCRA, including the main line, the Carlotta, Korblex, and Samoa branches, and the Arcata and Mad River line, in the proposal for interim trail use and possible future rail reactivation ("railbanking"). To the extent any of these segments are not included in railbanking, their rights of way are likely to be lost to the public irrevocably as the lines will be severed from any rail system and subject to abandonment.

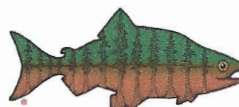
**Embargo and Non-Use.**

As stated in the Environmental Report, the NCRA line has been inoperable north of Willits since 1998. The line was ordered closed due to serious damage to the line in storms during the winter of 1996, a fact which underscores that challenges to freight rail operations have been a combination of steep and unstable terrain and the North Coast's extreme weather events.

When the Southern Pacific moved to abandon the rail line north of Willits in 1983, the line through the Eel River canyon was reported to be the most expensive stretch of line in the country to maintain. Over the decades since, it has become increasingly clear that there is insufficient demand for freight rail service to support the costs of operations and maintenance through the Eel River canyon.

**HUMBOLDT OFFICE**

707.798.6345 • foer@eelriver.org  
PO Box 4945, Arcata, CA 95518



FOER is intimately familiar with the relevant issues, having reviewed several analyses of the economic potential of the NCRA line north of Willits in various scenarios. Updated rail safety standards have only moved the idea of reopening the line further and further from economic reality.

But for decades, the NCRA refused to recognize this reality. When it sought to reopen the line without conducting the environmental review California required as a condition of state funding, FOER brought a legal challenge that ultimately resulted in a unanimous California Supreme Court ruling requiring the NCRA to follow state law. That decision helped to crystallize the dissatisfaction of California political leaders with the NCRA's failure to manage the public right of way in the public interest. That led to the passage of state legislation supporting the use of the right of way for public trails through railbanking.

#### Other related proceedings.

Pursuant to legislative direction, the southern portions of the NCRA line which are operable will be transferred to SMART. This includes the Willits – Healdsburg reach as well as the line between Schellville – Ignacio. Nothing about that transfer will cause any issues for the proposed railbanking.

#### Future of the Line.

As noted in the Report, the NCRA states that it may manage the railbanked line as a trail or turn it over to a new rail entity. Although the NCRA has changed significantly over the last decade, Friends of the Eel River has and will continue to advocate for the agency's dissolution.

#### Alternatives.

There are no feasible alternatives to the proposed action. As the Report suggests, independent estimates of \$600 million to rebuild the line to modern standards for rail use are well founded, and it's reasonable to expect a very high level of continuing operations and maintenance costs for a freight line in this location.

The only practicable alternative for the NCRA at this point would be to abandon the line permanently. This would not be in the public interest. Were the STB to allow the NCRA to do so, it would appear to be contrary to Congressional intent in enacting 16 U.S.C. 1247(d).

#### Additional information.

##### **2. 49 C.F.R. 1105.7(e)(2): Transportation System.**

As the Report notes, because the line has been out of use for decades, railbanking it will have no negative effect on the regional transportation system. It will, however, have substantial positive effects for regional transportation by providing safe routes for nonmotorized transportation. In many areas, including the Carlotta and Korblex branches, as well as the reaches of the NCRA line around Fortuna and up the Eel River to the confluence of the mainstem and the South Fork Eel, railbanking and trail use will provide a safe way to use sustainable modes of transportation like bicycles without risking riding on incredibly dangerous roads like Highways 36, 101, and 299.



### **3. 49 C.F.R. 1105.7(e)(3): Land Use.**

To our knowledge, there is nothing about railbanking that is in any way inconsistent with local land use plans.

*(iv) This is a potential abandonment, and the right of way could hardly be more suitable for alternative public use under 49 U.S.C. 10905.*

Because there is not a viable business model for rail use of the NCRA's right of way north of Willits, the line would be subject to abandonment. This has been effectively the case since the Southern Pacific shut the line down north of Willits in 1983. After the cost of maintaining the line through the Eel River canyon bankrupted the successor to SP, the California legislature created the NCRA in 1989 to acquire the line in order to prevent its abandonment.

However, as noted above, the NCRA has failed utterly over the decades since to make any progress in repairing the line north of Willits. The NCRA's mismanagement of the assets and funding it did secure, grounded in a deeply corrupt lease arrangement with the Northwest Pacific Co., destroyed any hope that the state of California would subsidize the repair and maintenance of a freight line for which there was evidently no substantial business demand. The three decades of the NCRA's ownership has thus only reinforced the case for abandonment.

Fortunately, Congress has provided for alternative public use in precisely these circumstances. As the Environmental Report and the report to California's legislature *Assessment of the North Coast Railroad Authority and Viability of a Great Redwood Trail* both document, the NCRA's right of way represents one of the most outstanding possible examples in the U.S. rail system of railbanking for trail use.

The Eel River and its canyon are extraordinarily beautiful, but have been inaccessible except by boat during the lifetimes of most Americans. Most of the canyon is not otherwise accessible by public roads. The Eel River canyon thus remains a corridor of relatively wild nature, where wildlife and relatively undisturbed natural processes can be observed, and where the works of man aside from the railroad itself are relatively infrequent parts of the picture. If there is a comparable stretch of isolated rail line along nearly a hundred miles of a remote, wild river, much less an opportunity to railbank it for public use, we are not aware of it.

The geologic instability that made the Eel River canyon so expensive a place to run a railroad will certainly present challenges, but building and maintaining a 21<sup>st</sup> century trail on the footprint of a 19<sup>th</sup> century railroad is an entirely different matter. Indeed, the vast majority of the right of way through the Eel River canyon is suitable for trail use with only minor work. The gentle grade of the rail line will welcome not only hikers and equestrians from all over the region, but can be expected to dramatically increase the already substantial number of people who – in the pre-pandemic era, at least -- traveled from all over the world to bicycle parts of the Pacific Coast.



During the pandemic, demand for outdoor recreation opportunities like the Great Redwood Trail would provide increased dramatically across the country and California. The bike and mixed use trails we have been able to construct in Humboldt County have certainly seen increased use. Trailheads are more crowded than ever. It's unlikely this demand will diminish.

While parts of the NCRA line may indeed take years to convert to trail use, many other portions, including all of the branch lines noted above (the Carlotta, Korblex, and Samoa branches), as well as the Arcata and Mad River (aka Annie and Mary) line, could be opened to the public in relatively short order with a generous application of infrastructure spending. It would be tremendously beneficial to the public welfare to do so.

**4. 49 C.F.R. 1105.7(e)(4): Energy.**

As far as we can tell, the proposed railbanking will have no obvious impact on energy generation, transmission, or use.

**5. 49 C.F.R. 1105.7(e)(5): Air.**

Because the line has been out of use for decades, railbanking will not affect air quality in the area.

**6. 49 C.F.R. 1105.7(e)(6): Noise.**

Again, because the line has been out of use for decades, the noise impacts of the railroad ceased long ago. Railbanking should have no significant effects in terms of noise.

**7. 49 C.F.R. 1105.7(e)(7): Safety.**

**(i) public health and safety**

Railbanking the NCRA line north of Willits will help to promote public health and safety in many ways across a large geographic area. As noted, there is significant demand for recreational trails across Northern California. The Great Redwood Trail will connect the California Coastal Trail to Willits and thence to the San Francisco Bay area. This will afford the public across the region many more and much safer opportunities to cycle, hike, and ride horses. As the increased use of existing recreational areas during the pandemic has taught us, railbanking the former NCRA line can offer truly significant public health benefits simply by facilitating people's access to natural areas, from the Mad River and Humboldt Bay to the banks of the Eel River.

**(iii) known hazardous waste sites or spills on right of way**

The material reproduced in the Report appears credible. FOER remains concerned that areas requiring cleanup be identified and cleaned up as soon as possible. Railbanking will arguably facilitate this process by empowering a trail agency to deal with the problems. The NCRA did nothing to address these issues over three decades; railbanking can't be worse than that.

**8. 49 C.F.R. 1105.7(e)(8): Biological Resources.**

The Eel River canyon and other areas the NCRA line transects are rich with important biological resources, including species listed under the California and US Endangered Species Acts (e.g. chinook salmon and steelhead) and others which may not be listed but

are nonetheless the focus of conservation and cultural concern (e.g. the Pacific lamprey which gave the Eel River its name). Fortunately, there is no apparent reason that railbanking should threaten to impact listed or unlisted species across the region in a significant way.

*(i) consultation with USFWS*

Because chinook salmon and steelhead are anadromous, their listing under the Endangered Species Act is managed by the National Marine Fisheries Service (NMFS) aka NOAA Fisheries. Pursuant to section 7 of the ESA, consultation with both USFWS and NMFS is therefore in order, to ensure there is no reason to anticipate adverse impacts from the proposed railbanking to species listed under the Act.

As well, the NCRA and its successor agency should take care to consult with the Round Valley Indian Tribes about railbanking and its potential impacts on biological or cultural resources important to the tribes.

*(ii) effects on wildlife refuges, National or State parks or forests*

As noted in the Report, the line passes by the Humboldt Bay National Wildlife Refuge. While the mainstem of the Eel River is listed under the both the California and US Wild and Scenic Rivers acts from the bottom of Cape Horn dam on the upper Eel to the Pacific, that designation neither impairs railroad operation nor discourages trail use. To the extent railbanking can be expected to affect public lands in the region, it is likely to be to encourage use of connected recreational trails.

**9. 49 C.F.R. 1105.7(e)(9): Water.**

As noted in the Report, railbanking should not incur significant impacts on water.

**10. 49 C.F.R. 1105.7(e)(10): Proposed Mitigation.**

Railbanking the NCRA line north of Willits is unlikely to lead to adverse environmental effects. Rather, turning the line into a trail open to public use will itself substantially mitigate many of the harms that mismanagement of the rail corridor has incurred over the last fifty years.

Thank you for your careful attention to this matter.

Sincerely,

/s/

Scott Greacen  
Conservation Director