

CHARLES H. MONTANGE

ATTORNEY AT LAW

426 NW 162ND STREET

SEATTLE, WASHINGTON 98177

(206) 546-1936

FAX: (206) 546-3739

19 May 2021

For E-Filing

Mr. Joshua Wayland
Office of Environmental Analysis
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

Additional Environmental Comments by Third Parties

Dear Madams/Sirs:

This letter 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. On behalf of NCRA, I am furnishing herewith additional environmental comments NCRA has received from third parties in connection with NCRA’s environmental report/historic report in the above-referenced proceeding. Judging from the Board’s website, these comments at this point do not appear to have been submitted directly to the agency. The two comments provided herewith are from City of Eureka and Humboldt Baykeepers.

Thank you for your assistance in this matter.

Respectfully submitted,



Charles Montange

for North Coast Rail Authority

Encl. (letter from City of Eureka, letter from Humboldt Baykeepers)

May 18, 2021

Mitch Stogner, Executive Director
North Coast Railroad Authority
419 Talmage Road, Suite M
Ukiah, CA 95482

Re: 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 City Council of the City of Eureka 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 the City of Eureka'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. 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 the City of Eureka 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.

Please continue to coordinate with Brian Gerving, Director of Public Works (707-441.4152) or bgerving@ci.eureka.ca.gov on trail-related matters in the City of Eureka's jurisdiction.

Sincerely,



Susan Seaman
Mayor



May 19, 2021

Ms. Cynthia T. Brown
Chief of the Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

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

Dear Ms. Brown:

I am writing on behalf of Humboldt Baykeeper for filing in the above-captioned proceeding. A copy is being served on counsel for North Coast Railroad Authority's attorney, as indicated below. Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance.

Humboldt Baykeeper strongly supports (a) NCRA's request for a Notice of Exemption for its rail line from MP 139.5 near or at Commercial Street in Willits all the way to Samoa at MP 300.5, Korbelt at MP 301.8 and inclusive of the Carlotta Branch to MP 267.72 and NCRA's request for a Notice of Interim Trail Use (NITU) for all of these properties. Due to ground movement and other geological factors, the Eel River Canyon is simply not suitable for a reliable and competitive rail use. The FRA embargoed the line in 1998. The line has only deteriorated since that time. Conversion of the line into a trail (in particular, a component of The Great Redwood Trail) will preserve it for the future,

600 F Street, Suite 3 #810
Arcata, CA 95521
(707) 499-3678
www.humboldtбайkeeper.org



facilitate local recreation and tourism, and protect and foster a variety of conservation and environmental values. We request STB to issue an effective NITU for this line as soon as possible.

Please add Humboldt Baykeeper to the service list as parties in this proceeding. Please note that my email address is jkalt@humbolddbaykeeper.org and that we consent to email service of pleadings. Thank you for this opportunity to comment.

____s/
Jennifer Kalt, Director

Cc. Charles H. Montange
Law Offices of Charles H. Montange
426 NW 162nd St.
Seattle, WA 98177
(by email to c.montange@frontier.com)
Attorney for NCRA