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18 May 2021

For E-Filing

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 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 Arcata and from Friends of Eel River (the latter has previously commented directly with the Board).

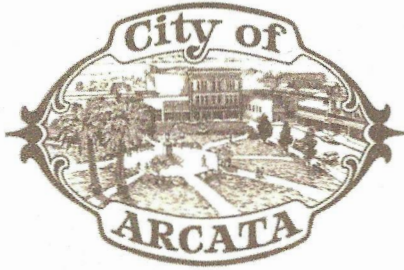
Thank you for your assistance in this matter.

Respectfully submitted,



Charles Montange
for North Coast Rail Authority

Encl. (letter from City of Arcata, letter from Friends of the Eel River)



736 F Street, Arcata, CA 95521

City Manager (707) 822-5953	Police (707) 822-2428	Recreation (707) 822-7091
Community Development (707) 822-5955	Finance (707) 822-5951	Transportation (707) 822-3775
Environmental Services Streets/Utilities (707) 822-5957	Environmental Services Community Services (707) 822-8184	Engineering & Building (707) 825-2128

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

May 14, 2021

Re: Support for Proposed Railbanking of the North Coast Railroad Authority right-of-way from Willits to End of Line in Samoa, Korblex, Korbek, and Carlotta; Surface Transportation Board Docket No. AB 1305

Dear Mr. Stogner,

The City of Arcata supports preserving the North Coast Railroad Authority's (NCRA) railroad right-of-way through railbanking for continued public benefit with interim trail use and potential future reconstruction and reactivation for rail service. NCRA's proposed action to file a railbanking application with the Surface Transportation Board will ensure this vital public resource remains dedicated for current and future transportation needs throughout the North Coast.

The City of Arcata manages the four mile Humboldt Bay Trail North as a rail-with-trail with a lease agreement with NCRA from Sunset Avenue, through the Creamery District and Arcata Marsh and Wildlife Sanctuary, and along Highway 101 where it will link to the County of Humboldt's Humboldt Bay Trail South planned for construction in 2022. Humboldt Bay Trail North has become an essential public resource for community members, providing a safe, separated active transportation route and opportunities for active living while physically distanced. Corridor preservation is essential for the City's rail-with-trail that is within the NCRA corridor but not located on the existing rail prism or tracks.

Following a robust community planning process, the City recently received an Active Transportation Program grant to design, permit, and construct the Arcata Annie & Mary Trail along the NCRA rail corridor from the northern terminus of the Humboldt Bay Trail North at Sunset Avenue to the Humboldt Bay Municipal Water District's Park 1 on the Mad River, providing a safe walking and biking connection between northern Arcata neighborhoods to downtown and also river access for Arcata residents. The City looks forward to continued collaboration with NCRA, the successor Great Redwood Trail agency, the County of Humboldt, HBMWD, and community residents to design and implement the Arcata Annie & Mary Trail and potential future trail projects to enhance transportation equity, quality of life, and greenhouse gas reduction goals. While railbanking will preserve the corridor for transportation use, suitability for trail development will be determined on a segment-by-segment basis in consultation with adjacent landowners to ensure compatibility with surrounding land uses.

Should you have any questions regarding the City's support, please do not hesitate to contact City Manager Karen Diemer at 707-822-5953 or kdiemer@cityofarcata.org.

Sincerely,

Sofia Pereira, Mayor
City of Arcata



FRIENDS OF THE EEL RIVER

Working for the recovery of our Wild & Scenic River, its fisheries and communities.

Friday, May 14, 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:

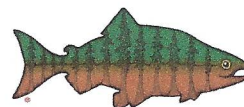
Please accept this comment on behalf of Friends of the Eel River for filing in the above-captioned proceeding. A copy is being served on counsel for North Coast Railroad Authority's attorney, as indicated below.

Friends of the Eel River 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 to Samoa at MP 300.5, Korbelt at MP 301.8 and inclusive of the Carlotta Branch to MP 267.72 and (b) 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 at this time. The FRA embargoed the line in 1998. The line has significantly deteriorated since then. On the other hand, conversion of the line into a trail (in particular, a component of The Great Redwood Trail) will preserve the right of way for the future should technology and economics support future rail use. Use of the right of way as a trail will significantly benefit local recreation and tourism, not least by providing greater public access to the magnificent Eel River. Conversion to a trail will also include long-overdue work to address environmental damage the deteriorating line continues to cause the Eel River. We request STB issue an effective NITU for this line as soon as possible.

HUMBOLDT OFFICE

707.798.6345 • foer@eelriver.org
PO Box 4945, Arcata, CA 95518



Please add Friends of the Eel River to the service list as parties in this proceeding. Please note that our email address is foer@eelriver.org and we consent to email service of pleadings. Thank you for this opportunity to comment.

Very truly,

A handwritten signature in cursive script, appearing to read "Alicia Hamann".

Alicia Hamann
Executive 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