

May 20, 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:

This comment, on behalf of San Francisco Baykeeper, is for filing in the above-captioned proceeding. A copy is being served on counsel for North Coast Railroad Authority's attorney, as indicated below.

San Francisco Baykeeper ("Baykeeper") is a non-profit public benefit corporation organized under the laws of the State of California. Baykeeper submits these comments on behalf of its approximately 5,000 members and supporters who live and/or recreate in and around the San Francisco Bay Area. Baykeeper's mission is to defend San Francisco Bay from the biggest threats and hold polluters and government agencies accountable to create healthier communities and help wildlife thrive. Our team of scientists and lawyers investigate pollution via aerial and on-the-water patrols, strengthen regulations through policy advocacy, and enforce environmental laws on behalf of the public.

Baykeeper 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. On the other hand, conversion of

the line into a trail (in particular, a component of The Great Redwood Trail) will preserve it for the future, 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 Baykeeper to the service list as parties in this proceeding. Please note that my email address is ben@baykeeper.org and we consent to email service of pleadings. Thank you for this opportunity to comment.

Very truly,
Ben Eichenberg
Staff Attorney
San Francisco Baykeeper

cc. Charles H. Montange
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