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Office of Proceedings
June 3, 2021
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Public Record

May 27, 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:

On behalf of Rails-to-Trails Conservancy, we are writing in support of the above-captioned proceeding. A copy is being served on counsel for North Coast Railroad Authority's attorney, as indicated below.

Rails-to-Trails Conservancy supports:

1. 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
2. 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, which has only deteriorated since that time.

The plan to railbank the line and create The Great Redwood Trail is the highest and best use of this valuable corridor. Development of the 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 Rails-to-Trails Conservancy to the service list as parties in this proceeding. Please note that our email address is laura@railstotrails.org and we consent to email service of pleadings. Thank you for this opportunity to comment.

Very truly,
Laura Cohen, Western Region Director
Rails-to-Trails Conservancy

cc:
Charles H. Montange, Attorney for NCRA
(by email to c.montange@frontier.com)

John Anderson, Humboldt and Mendocino Redwood Companies (by email: jandersen@mendoco.com)

Bruce Silvey, Humboldt Trails Council (by email: besmft@gmail.com)

David Schonbrunn, Transportation Solutions Defense & Education Fund (by email: david@schonbrunn.org)