

HUMBOLDT



BAYKEEPER



May 19, 2021
302512

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**

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

**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,

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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

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