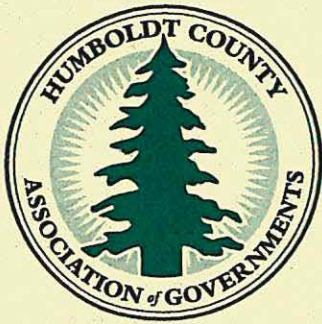




HCAOG

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June 15, 2021

The Honorable Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, SW, Room #100
Washington, DC 20423-0001

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. AB1305

Dear Ms. Brown,

In its capacity as the Regional Transportation Planning Agency, the Humboldt County Association of Governments (HCAOG) 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 regional plans and policies adopted by HCAOG. The Corridor Preservation Plan (2010) identified the NCRA railroad corridor as a critical transportation corridor that should be preserved for a variety of transportation uses. Railbanking was identified as one strategy that could be used to link the land use to transportation purposes. HCAOG's Regional Transportation Plan *VROOM- Variety in Rural Options of Mobility* (2017) establishes policies to guide the region's transportation system. Policy GM-7 "encourages the highest and best use of rail right-of-way in Humboldt County," and Policy Trails-3 further "supports using existing public right-of-way for trails (to the maximum extent feasible)."

The Honorable Cynthia T. Brown
June 15, 2021
Page 2

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"). HCAOG supports the near-term priority to develop trail segments linking cities and communities within the coastal region along Humboldt Bay, the Eel River Valley, and the Mad River. Consistent with regional efforts to significantly reduce single-occupancy vehicular travel, HCAOG is especially invested in the completion of paved multi-use trails that connect cities and smaller urban areas for the purposes of transportation. Developing trails within the more remote interior region will likely be a longer-term effort that will require significant planning and consultation with landowners.

HCAOG also participates in and supports regional efforts to plan for sea-level rise. The railroad along the Humboldt Bay shoreline has become critical coastal protection infrastructure, yet 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.

Sincerely,



Beth Burks
Executive Director

cc: All Parties of Record:
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Jennifer Kalt
Laura Cohen
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