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*Police*  
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*Environmental Services*  
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*Engineering & Building*  
(707) 825-2128

August 30, 2021

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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  
August 31, 2021  
Part of  
Public Record

**Re: North Coast Railroad Authority – Abandonment Exemption – in Mendocino, Trinity and Humboldt Counties, CA, AB 1305X.**

Dear Ms. Brown:

This comment, on behalf of the City of Arcata, 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.

The City of Arcata 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, Korbel 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, running freight on the northern section of the NCRA line, in particular the Eel River Canyon, is not economically feasible for reliable and competitive rail use. The rail line has greatly deteriorated since the Federal Railroad Administration embargoed the line in 1998 and trains stopped running. The City urges the STB to not delay in railbanking the NCRA line.

The City of Arcata manages the four mile Humboldt Bay Trail North as a rail-with-trail within the NCRA corridor, which has become an essential public resource for community members, providing a safe, separated active transportation route and opportunities for active living while physically distanced. An average of 200 people per day walk and bike along the trail with even more use during the summer months, even though the Humboldt Bay Trail does not yet connect to Eureka. Expanding non-motorized trail opportunities along the NCRA line will have a myriad of benefits for local communities including enhanced coastal access and safe, affordable transportation choices connecting disadvantaged communities. The City recently secured \$5.3 million in state Active Transportation Program funding to expand the trail north to provide a safe, separated non-motorized transportation route between downtown and north Arcata. Railbanking will be essential to realize the completion of this trail segment.

Conversion of the NCRA line for interim trail use, The Great Redwood Trail, will preserve this transportation asset for the future, facilitate local recreation and tourism, and protect and foster a variety of conservation and environmental values. The Great Redwood Trail Feasibility Report (California State Parks, 2020) estimates that 2,000 people a day will utilize The Great Redwood Trail once complete. We request STB to issue an effective NITU for this line as soon as possible.

Please add the City of Arcata to the service list as parties in this proceeding and note that our email address is [eservices@cityofarcata.org](mailto:eservices@cityofarcata.org). We consent to email service of pleadings. Thank you for this opportunity to comment.

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](mailto:kdiemer@cityofarcata.org).

Sincerely,



Brett Watson, Mayor  
City of Arcata

cc. Charles H. Montange  
Law Offices of Charles H. Montange  
426 NW 162<sup>nd</sup> St.  
Seattle, WA 98177  
(by email to [c.montange@frontier.com](mailto:c.montange@frontier.com))  
Attorney for NCRA

cc. Parties of Record