



EI-32046

June 6, 2022

Danielle Gosselin
Director of the Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Corrected Draft Environmental Assessment for Docket No. AB 1305X – North Coast Railroad Authority Abandonment Exemption in Mendocino, Trinity and Humboldt Counties, CA; Docket No. AB 1305X

Dear Ms. Gosselin:

The Coalition for Responsible Transportation Priorities (CRTP) is a non-profit organization based in Humboldt County whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP agrees with the corrected draft Environmental Assessment (EA) conclusion that the conversion of the rail line at issue in Docket No. AB 1305X to interim trail use will not cause significant environmental impacts.

However, we strongly disagree with the draft EA's assertion that resumption of rail service on this line would not be a federal action covered by the National Environmental Policy Act (NEPA). This would not be, as the EA would have it, a mere "change in rail service." As the EA itself notes, trains have not run on this line for decades, as a result of a Federal Railroad Administration embargo dating to 1998, and the environmental conditions leading to the embargo have only grown more severe. Furthermore, the State of California has officially converted the North Coast Railroad Authority, the public agency which owns this line, into the Great Redwood Trail Agency, with the express mandate of developing it for trail use. In other words, both federal and state actions to date preclude rail service on the line for the foreseeable future. It is *only* through the Surface Transportation Board's potential acceptance of one or more Offers of Financial Assistance (OFAs) in the current proceeding that rail service could resume on the line. This would clearly constitute a federal action subject to environmental review under NEPA.

The action of accepting one or more OFAs which lead to the resumption of freight service on the line would undeniably result in a multitude of significant impacts. Resuming service would cause a significant degradation in air quality in many communities. Bringing the rail line back into service would also require major track reconstruction and associated infrastructure through hundreds of miles of environmentally sensitive habitat, resulting in significant impacts to water

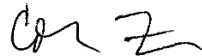
quality and biological resources. It would also necessitate major port upgrades at Humboldt Bay to serve the rail line, resulting in further impacts. Even after reconstruction and rehabilitation, maintenance of the line through the Eel River Canyon and nearby areas is known to be so expensive that it could only be financially feasible with a very high volume of high-value freight, and it has been widely reported that the likeliest freight for at least one of the offerors, the North Coast Railroad Company, is coal. Transportation of coal by rail would result in additional significant impacts to air and water quality through fugitive dust emissions and derailments (which are known to be more common with coal than with other cargoes), as well as inducing significant impacts to the global climate through the burning of that coal for energy at its final destination.

Any action to accept an OFA would also jeopardize critical safety infrastructure throughout the region. Of California's 58 counties, Humboldt County is currently ranked as the second most dangerous in the state for pedestrians and the 16th most dangerous for bicyclists by the California Office of Traffic Safety. Mendocino County is ranked 9th most dangerous in the state for pedestrians. The planned interim trail use of the rail line would provide desperately needed safe facilities for pedestrians and bicyclists in many communities along the line. The Bay Trail South is one important example. This trail is the culmination of decades of demand for a safe bicycle and transportation route between Arcata and Eureka, the region's two largest towns. The reinforced trail prism is also being designed to protect Highway 101, the region's only major north-south travel corridor, from the periodic and increasing threat of regular inundation during high tides and storm conditions. Accepting an OFA for this segment would cause additional injuries and deaths resulting from a lack of safe travel options between Arcata and Eureka and risk of regular inundation of a highway segment which transports many of the region's passenger vehicles, freight, buses, and emergency vehicles.

In summary, the draft EA errs in failing to assess the environmental impacts of the potential resumption of rail service on the line, which is a foreseeable result of the Board's potential action in this proceeding. Furthermore, given the magnitude of the environmental impacts of such an action, a full Environmental Impact Statement (EIS) should be prepared.

Thank you for your consideration.

Sincerely,



Colin Fiske

Executive Director

Coalition for Responsible Transportation Priorities

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