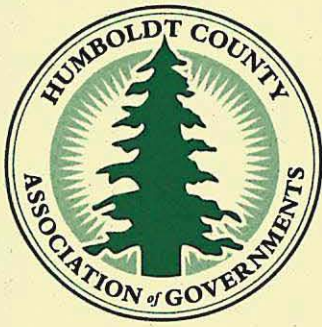




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June 22, 2022
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VIA E-FILING

June 22, 2022

Cynthia T. Brown, Chief of Section
Administration Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington DC 20423-0001

Re: North Coast Railroad Authority – Abandonment Exemption In
Mendocino, Trinity, and Humboldt Counties, California AB-1305X.

Dear Ms. Brown:

The Board of Directors of the Humboldt County Association of Governments (HCAOG) is writing to express strong support for the Great Redwood Trail Agency's/North Coast Railroad Authorities (GRTA/NCRA) motions to reject the pending notices of intent to file offers of financial assistance that your office has received.

Three applicants have filed offers of financial assistance, attempting to force GRTA/NCRA to sell its real property interest, purportedly seeking ownership to resume freight operations. None of them have or can establish any continued need for freight rail service through this "mud glacier" railway corridor, which has not been able to support freight rail service since 1998. Because of the precarious terrain and collapse of the timber industry in Northern California, service on the line has been financially and logistically infeasible for decades.

This line has been embargoed for 24 years (and counting), proving false the assertion that freight traffic is necessary on this line. The Federal Railroad Administration embargoed the line for safety reasons in 1998, and the embargo has never been lifted as to any portion of the line at issue here.

Also contradicting the false assertion that freight traffic is necessary on this rail is the fact that for 25+ years the North Coast Railroad Authority attempted and failed to bring freight rail back to life on this line. The recent history of this rail corridor is a legacy of several bankrupted companies that attempted to operate freight rail service, and a state agency, the NCRA, that was insolvent for all its attempts to bring freight rail back.

The Great Redwood Trail holds the promise of better legacy, one that has broad, deep, and enthusiastic support throughout Humboldt, Mendocino, Sonoma, and Marin Counties. Under its authority as the Regional Transportation Planning Agency for Humboldt County, HCAOG has had as one of its highest priorities the creation of a rail-to-trail (or rail with trail) along the GRTA/NCRA corridor to provide communities of the Greater Humboldt Bay Area with safe travel routes for pedestrians and bicyclists, to increase clean and active transportation. The HCAOG Board recognizes the health, safety, economic, recreational, and environmental benefits that will come from the Great Redwood Trail. The legacy of the GRTA/NCRA rail corridor should be a world-class public investment that is financially viable, nontoxic, healthy transportation use of the now defunct North Coast rail line.

The applicant's claim that the market requires, or would support, freight service on the former Northwestern Pacific rail line makes no sense when that argument is illuminated by facts:

- No active freight carriers seek ownership of the line. None of the three offerors have ever engaged in interstate rail activities or currently operate freight rail.
- No active shippers or any possible shippers are located on the line. None of the three offerors demonstrate any specific continued need for freight rail service on the line.
- Two of the three offerors have never pulled a single carload of any cargo in any location.
- No product in the modern era has successfully been shipped along former North Coast Railroad Authority line.
- The entire line at issue has been embargoed for safety for over 20 years without serious effort from shippers or resources from private carriers to have the connection reestablished.
- The astronomical cost of a rehabilitating the line, several portions of which have fallen into canyons or waterways, would require exponentially more freight activity to be generated on the North Coast to rehabilitate and operate the line than has ever existed.

For the Surface Transportation Board (Board) to compel a state-created agency to sell its interest in this critical environmental and economic resource on the basis of such demonstrably absurd claims of a need for freight, would do grave injustice to the people of the State of California, and run afoul of the intent and terms of Board's regulatory authority.

Moreover, with respect to the request by the North Coast Railroad Company (NCRCo) for leave to file out of time its Notice of Intent to File an OFA, we respectfully urge the Board to reject this request outright. The Notice of Exemption in this abandonment proceeding was filed on May 14, 2021, so NCRCo has had ample notice about this proceeding which has been pending before the Board for over a year.

Based on the foregoing, we urge the Board to grant the GRTA/NCRA's motion to reject the notices of intent to file offers of financial assistance.

Certificate of Service. I hereby certify that I have this day served copies of this document upon all parties of record in this proceeding by email attachment.

This correspondence has been authorized by unanimous vote of the HCAOG Board on June 16, 2022. Thank you for your attention to this most important matter.

Sincerely,

Beth Burks, Executive Director
on Behalf of
Mike Johnson
HCAOG Board Chair