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Office of Proceedings
October 20, 2022
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Cynthia T. Brown, Chief
Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, W.W.
Washington, D.C. 20423-001

Re: Great Redwood Trail Agency – Abandonment Exemption—
In Mendocino, et al Counties, CA, AB 1305X,
In the Matter of an Offer of Financial Assistance

Dear Ms. Brown:

This letter is intended to express strong opposition to Mendocino Railway's (MR) "Offer of Financial Assistance" ("OFA") for MP 139.5 (Willits) north to MP 152.5.

The segment in question has no established connection to the national rail system (Willits is over 75 miles from any operable rails), has remained unused since a federal safety embargo was imposed in 1998, and lacks any shipping customers.

On September 15, 2022, Great Redwood Trail Agency - the California agency who now owns the NWP - filed a geological report and engineering assessment with the STB stating that the cost simply to rehabilitate the 13-mile segment north of Willits would be over \$22 million, and would of course require substantial annual maintenance thereafter.

MR lacks the funds to repair its own collapsed tunnel (which has been closed for over seven years) and to rehabilitate its own line from Willits to Fort Bragg, a task for which it is seeking a \$31 million taxpayer subsidy from the US Department of Transportation.

The economic infeasibility of this OFA underscores a crucial resource allocation issue. MR's inability to fix its own line demonstrates its needs for taxpayer subsidies to operate the full

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line they already own. Obviously, MR will need additional public subsidies to rehabilitate the proposed OFA segment. From a public policy standpoint, it makes no economic sense to devote government subsidies to restoration of a segment of rail that will not create a bona fide connection to the national rail system let alone a line without a customer base.

It cannot be overstressed that even if Mendocino Railway obtained funds to restore the 13-mile segment, the line would effectively terminate at Willits and be of no real use, except as another tourist/excursion route for MR's Skunk Train.

The State of California has a good faith public use for this property and has invested millions of dollars into the creation of the Great Redwood Trail, and it has dedicated millions more for its continued development. It is wrong to use this process to seize the public's property. It is also wrong to use such procedures for rail bikes and tourist excursion trains, which is all that MR can be reasonably expected to achieve with this OFA.

Please let me know if there is anything further I can provide on this subject, and thank you for your hard work on this item and your consideration of this letter.

Warmest regards,

A handwritten signature in black ink, appearing to be 'Mike McGuire', with a stylized, cursive-like loop at the end.

Mike McGuire
State Senate Majority Leader

I, Jason Liles, certify service of the foregoing letter on the date of the foregoing letter upon all parties of record in STB proceeding AB 1305X by email attachment.

s/ Jason Liles

Oct. 20, 2022