

BEFORE THE SURFACE TRANSPORTATION BOARD

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Public Record

Great Redwood Trail Agency -)
Adverse Abandonment -) AB 1305 (Sub-No. 1)
Mendocino Railway in Mendocino)
County, CA)

**THE NORTH COAST RAILS WITH TRAILS COALITION REPLY
TO GRTA's PETITION FOR PARTIAL WAIVER OF ABANDONMENT
REGULATIONS AND FOR EXEMPTION FROM STATUTORY REQUIREMENTS**

The North Coast Rails With Trails Coalition respectfully offers the following Reply to GRTA's recent Petition for Partial Waiver of Abandonment Regulations and for Exemption from Statutory Requirements ("Petition").

The North Coast Rails With Trails Coalition is composed of North Coast residents, businesses and non-profits. We oppose the abandonment of GRTA's trackage between Cloverdale and Willits. Our coalition wishes to have a passenger rail connection between the Bay Area and Mendocino County, including the cities of Ukiah and Willits.

In addition, many local businesses in our coalition have previously shipped by rail, prior to the Emergency Order that shut down the NWP. These shippers desire to ship by rail once again. A shortage of truck drivers makes trucking significantly more expensive than rail is likely to be, and less convenient. One gallon of diesel fuel will move one ton of freight almost 500 miles by rail, making rail much more efficient. Greenhouse gases are reduced by 75% compared to trucks. In addition, tractor-trailers do a lot of damage to North Coast highways, above and beyond the congestion they cause and the accidents they are in.

To make it clear to the Board that the community wants rail service restored, we will be separately submitting a list of shippers desiring rail service, marking it as Confidential, because of its commercial sensitivity. Due to a medical emergency, however, involving the convener of the Coalition, Allan Hemphill, that submission cannot happen today. Allan is still in the hospital, recovering from surgery. The shipper list will be submitted as soon as possible. The Coalition requests the Board to deem the shipper list as submitted at the same time as this Reply.

As our name indicates, the North Coast Rails With Trails Coalition is supportive of rails with trails—trails alongside the tracks. However, we strongly oppose GRTA's intention to railbank its line from Cloverdale to Willits. We are clear that a working rail line with an adjacent trail will be far more economically beneficial to the community than a mere trail. In addition, the ability to have passenger trains on the line would facilitate the use of the trail, reducing the Vehicle Miles Travelled and greenhouse gases emitted by users of the trail when accessing it.

The North Coast Rails With Trails Coalition is confident that an OFA process for the Cloverdale to Willits segment will result in a successful application offering strong financial resources, supported by the healthy list of shippers desiring service that is being filed along with this Reply. Such a result would clearly be consistent with STB's Rail Transportation Policy 4: "To ensure the development and continuation of a sound rail transportation system with effective competition among rail carriers and with other modes, to meet the needs of the public and the national defense;"

The North Coast Rails With Trails Coalition formally objects to the granting of GRTA's request for Partial Waiver of Abandonment Regulations and for Exemption from Statutory Requirements, as that request is calculated to prevent the restoration of freight and passenger rail service, which would be contrary to the mission of the Board.

I certify that all parties to this proceeding, as of today, have been served this Reply.

Dated: March 20, 2023

/s/ Michael Pechner
Michael Pechner, Vice-President, Communications