

BEFORE THE SURFACE TRANSPORTATION BOARD

308379

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

ENTERED
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**TRANSDEF REPLY TO GRTA's APPLICATION FOR
ADVERSE ABANDONMENT**

The Transportation Solutions Defense and Education Fund ("TRANSDEF") was the first party to file comments when abandonment was proposed for the NWP. TRANSDEF and its sister organization, the Train Riders Association of California, have consistently opposed the abandonment of NCRA (now, Great Redwood Trail Agency, or GRTA) trackage, out of the recognition of rail's innate energy efficiency and California's need for alternative modes of transportation.

While TRANSDEF has no objections to rails with trails—trails alongside the tracks—we strongly oppose GRTA's intention to railbank its line from Cloverdale to Willits. We vehemently oppose the removing of tracks or the covering of them with dirt and gravel. California needs to keep its existing rails intact.

TRANSDEF respectfully offers the following Reply to GRTA's recent Application For Adverse Abandonment ("Application"):

GRTA's State Mandate

GRTA's Executive Director has either mistakenly or willfully misinterpreted its legislative mandate:

Under Cal. Gov. Code § 93022, the California Legislature tasked GRTA with the establishment of a world class trail spanning hundreds of miles of the North Coast, including express direction to railbank the GRTA Line in accordance with STB rules and the National Trails System Act ... Specifically, for purposes of this proceeding, GRTA must file for abandonment of the GRTA Line and seek to railbank it as part of GRTA's statutory mandate." (Verified Statement of Elaine Hogan, pp. 1-2.)

The following statutory citations substantiate TRANSDEF's assertion:

1. While Gov. Code § 93022(a)(1) does indeed call for railbanking, it also states: "The federal Surface Transportation Board's railbanking process may be initiated, completed, or initiated and completed by segment of the rail rights-of-way." Although one large segment has already been completed, this cite does not require completion of all segments by a date certain.

TRANSDEF believes this section should be understood to be the result of the Legislature being told there was no freight demand on the Cloverdale-to-Eureka segment of the NCRA by the studies conducted for SB 1029. See discussion of those studies, *infra*. In addition, the Legislature never was informed about the STB's policy about not stranding a freight carrier, so it was unaware that railbanking could only be accomplished by intruding on the rights of another railroad. Such an outcome was never contemplated by the Legislature. The Board should view GRTA's Application as unauthorized by state statute.

TRANSDEF urges the Board to understand this code section as not hostile to freight rail--the Legislature was kept in the dark as to the potential for profitable freight service. If this understanding is added to the significance of the next two code sections, it should be clear that California does not actually support the adverse abandonment of the MR in order to be able to abandon the GRTA Line.

2. Gov. Code § 93022(b)(2) states:

Contract with an operator to operate **excursion rail service**, except that the **excursion rail service** shall not interfere with or harm the rail rights-of-way. The operator shall pay all expenses associated with rail construction, maintenance, and operation, including equipment, track safety, bridges, trestles, and pedestrian safety applicable to the excursion rail service. (emphasis added.)

Gov. Code § 93022(c) clarified that: "This section shall become operative on March 1, 2022."

3. In reciting the new agency's powers, Gov. Code § 93024(a)(18) includes: "To adopt and enforce rules and regulations for the administration, operation, use, and maintenance of trails, **excursion rail service**, and other recreational facilities and programs implemented pursuant to this title." (emphasis added.) Gov. Code § 93024(b) states "This section shall become operative on March 1, 2022."

The language for these two citations, now clearly operative, indicates that the Legislature intended to permit excursion rail service.

3. In reciting the new agency's powers, Gov. Code § 93022(a)(5) includes: "To lease, rent, sell, exchange, or transfer interests in real property if doing so is both consistent with the **potential full restoration of railroad use** upon an order of the federal Surface Transportation Board **without cost** to the agency..." (emphasis added.) This language suggests that the existing rail line should not be severed or covered over with soil, gravel or other material, because that would cost the agency money to restore it to its pre-railbanking condition.

4. "SMART will be responsible for rail-with-trail development for the southern segment of the Trail." (Verified Statement of Elaine Hogan, p. 3.) This admission that rail-with-trail is a permissible method of implementing the Trail project strips naked GRTA's claim that

its mandate permits no rail with trail. The GRTA Line thus can operate as rail-with-trail, just like the SMART segment of the NWP.

As demonstrated herein, Ms. Hogan's statements, cited *supra*, make claims that are unsupported by statute. Because excursion rail is clearly contemplated, there is no justification for GRTA to **not** proceed with rail-with-trail on the GRTA Line (Willits NWP segment).

Excursion service

The NWP has a long history of excursion service. See Exhibit 1, NWPRR Tourist Train History. The last excursion service operating on the NWP was 1998, with a book of 2000 reservations at the time the railroad was shut down by the FRA.

In addition, flagstop passenger service would complement the Trail plan, enabling hikers and cyclists to access otherwise-remote locations along the Rail Trail. This contradicts the assertion that "First, **abandonment** will support the area's transition to ecotourism from a timber-based economy. ... Overall, abandonment will put to rest ongoing confusion about the MR Line's status and help the economy blossom as a **tourist destination**." (Application p. 40, emphasis added.) Mendocino Railway is already Mendocino County's top tourist destination. Excursion service on the GRTA Line would significantly add to the county's tourist visitation.

Since the Legislature clearly intended that the rails be left in place to enable excursion service alongside a trail, abandoning and railbanking the GRTA Line would achieve no benefit. The Board should deny the Application for Adverse Abandonment, as approving it would not serve the public or anyone else.

GRTA's Flawed Assertions

"... the State of California, after a thorough analysis by California's transportation agency, has directed the transition away from rail to trail uses." (Application, p. 13.) Contrary to this assertion, the part of the 2020 SB 1029 Assessment of NCRA Report to Legislature titled "The Great Redwood Trail Feasibility, Governance, And Railbanking Report" was prepared by Ascent Environmental, Inc. and Alta Planning and Design. That is very different from implying that the California Department of Transportation prepared the report, and carries much less credibility.

The SB 1029 Studies were a highly politicized effort to push the Trail, considering the Trail as the only Alternative. Despite claiming to reach out to freight stakeholders ("Neighboring wineries, timber industry, raw natural resources producers, existing freight customers"; Appendix D, Governance and Railbanking Report, p. 4; <https://calsta.ca.gov/-/media/calsta-media/documents/appendix-d--cdpr-great-redwood-trail-feasibility-report508remediateda11y.pdf>) the report made no mention of current demand for rail freight in the NWP Corridor and completely ignored the potential to regrow the freight business in the Corridor. It appears from discussions TRANSDEF had with informed persons that the preparers contacted only a few businesses, if that.

The foundational assertions that are central to the justification for adverse abandonment are outdated and unsupported:

Rail freight is not an economically viable business on the MR Line as transportation costs would be prohibitively high given **the required rail rehabilitation**. Feasibility & Market Analysis at 17-25. (Application p. 37, emphasis added.)

Moreover, the MR Line will require significant rehabilitation to bring it in line with FRA Class 1 track standards. D&A Report I at 11 (rehabilitation cost estimate is \$31,598,000 for MR Line). In other words, there is absolutely no need or possibility for freight rail service on this MR Line based on these **numerous and insurmountable roadblocks** to any freight operations. (Application p. 37, emphasis added.)

Due to the short haul distances and competition from trucks in Mendocino County, there is insufficient actual demand for rail freight transport from Willits to Fort Bragg to justify the **significant capital investment** required to improve the MR Line necessary for the rail freight, let alone maintain and operate them. (Application pp. 39-40, emphasis added.)

That and similar assertions are invalidated by the new development admitted here:

Recently, the DOT appeared to approve MR's RRIF Express loan application. See <https://www.transportation.gov/buildamerica/financing/rrif> (showing **approved \$31.4 million loan** application for MR or its parent company, Sierra Railroad) (accessed February 6, 2024). (Application p. 20, emphasis added.)

Essentially, GRTA's entire adverse abandonment case died when the RRIF loan was approved. Nonetheless, the underlying rationales of the Application have not been modified in response to these new conditions. This Application is stale and out-of-date. TRANSDEF urged the GRTA to hold off on filing the Application pending resolution of any issues pertaining to the loan, but it proceeded to file, nonetheless.

The Marie Jones Verified Statement, Appendix C, went beyond this lack of interest in the potential for freight, which can be characterized as a hostile effort to actively looking for reasons why freight rail can't work. TRANSDEF objects to the admission of Verified Statement 3 and its Appendices and offers in rebuttal Exhibit 2, the Verified Statement of Michael Setty, MUP.

We offer Exhibit 3, the Verified Statement of Michael Strider, P.E., which provides several updates of and clarifications to the information presented in the Application's Verified Statement 1 and its Appendices.

Federal Preemption

Under the ICCTA, 49 USCS § 10501(b) authorizes exclusive STB jurisdiction over freight operations. The California Legislature's preference for excursion rail over freight rail is to be given no weight by the Board. It is preempted by 49 USCS § 10101(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;" (emphasis added).

As long as MR is able to demonstrate it will provide rail transportation [of freight], the Board should deny the Application for Adverse Abandonment on preemption grounds.

Further Outcomes

If the Board denies the Application for Adverse Abandonment of Mendocino Railway, GRTA would not be permitted to proceed with abandonment of the GRTA Line. *R.J. Corman R.R. Property, LLL – Aban. Exemption – in Scott, Campbell, and Anderson Counties, Tenn.*, STB Docket No. AB-1296X, slip op. at 3 (STB served Nov. 17, 2022) (citation omitted).

TRANSDEF would greet such an outcome with delight, as it would force GRTA to open the door to negotiating with Mendocino Railway. TRANSDEF expects that this would lead to either an outright sale of the GRTA Line with a trail easement, or a long-term lease.

Either way, this is an outcome that should be welcomed by the Board, as the restoration of freight and passenger service to Willits would be in the public interest and consistent with the Rail Transportation Policy, 49 USCS § 10101(4), cited *supra*. It would also be consistent with California's state policy calling for a reduction in Vehicle Miles Travelled, both of cars and trucks, to reduce both congestion and greenhouse gas emissions:

Achieve a per capita VMT reduction of at least 25 percent
below 2019 levels by 2030 and 30 percent below 2019 levels
by 2045.

(2022 Scoping Plan Update, California Air Resources Board, p. 194, accessible at: ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf)

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

Dated: June 12, 2024

Respectfully submitted,

/s/ DAVID SCHONBRUNN

David Schonbrunn, President

Attachments

Exhibits 1-3

Exhibit 1

NORTHWESTERN PACIFIC RAILROAD TOURIST TRAIN HISTORY

The Northwestern Pacific Railroad and its predecessor railroads all ran excursion passenger trains over mainline and branch lines from the 1920s thru 1968. Earlier operators referred to these non-regular trains as tourist trains. Regular passenger train service on the NWPRR ceased on April 30, 1971.

Following the ownership change from Southern Pacific Transportation Co. to Eureka Southern Railroad in 1984, regularized excursion service commenced on the "North End" Eureka to Willits segment with periodic excursions on the Eureka-Samoa and Eureka-Carlotta segments. Following the ownership change from Eureka Southern Railroad to North Coast Railroad Authority (NCRA) in 1992, periodic excursion trains were operated Eureka to Willits and Willits to Outlet.

Following the June 1996 ownership change from Southern Pacific Transportation Co. to NCRA for the remainder of the Willits to Schellville "South End" mainline, NCRA established a "Director of Passenger Train Operation". The Director contracted with two agencies to market and supervise on-board services for six excursion/tourist trains operating between Healdsburg and Willits. Those six trains commenced on October 5, 1996 and operated through October 20, 1996. Two levels of service including dining and lounge service were offered with total ridership exceeding 2000.

Following the successful demonstration of tourist trains in the fall of 1996, the NCRA issued an RFP for an operator to initiate weekend tourist trains. California Redwood Coast Company (CRCC) was awarded the contract in December 1996 and commenced operations in March 1997. A total of twenty tourist trains were operated between Healdsburg and Willits and Santa Rosa & Healdsburg. Booking were robust with several trains sold-out in the first-class accommodations. Train consists included former Amtrak rolling stock that allowed capacity increases in excess of 300 passengers. CRCC initiated contracts with passenger train rolling stock owners for delivery of rail diesel cars (RDC) for subsequent seasons.

On June 11, 1997, NCRA, FRA and CPUC signed a safety compliance agreement with 11 action items relating to track defect repair, locomotive air brake testing and other areas. The agreement referenced previous non-compliance with federal safety statutes and regulations based on FRA-CPUC inspections. As a result of this agreement NCRA issued an order to California Redwood Coast Company (CRCC) to cease tourist trains operations pending reinstatement after repairs were made. The last CRCC train operated on June 7, 1997. Bookings for trains through summer 1997 numbered approximately 2000.

Sources:

The Northwestern Pacific Railroad – Boom & Bust. Angelo Figone, 1997

CRCC archives, San Francisco

Exhibit 2

Train Riders Association of California (TRAC)
1017 L St Suite 765
Sacramento, CA. 95814
<https://calrailnews.org>
President@calrailnews.org

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

The Train Riders Association of California (TRAC) has advocated for improving passenger rail in California for four decades. Our organization is currently involved in several efforts around the state to restore rail lines to service. We are eager to see a public-private partnership return the out-of-service rails of the GRTA Line back into productive freight and passenger service. The first step for us in that process is to oppose the Great Redwood Trail Agency's ("GRTA") application for adverse abandonment of Mendocino Railway ("MR").

As the new President of TRAC, I rely on my Masters in Urban Planning and 40 years of experience as a transit planner to offer the following comments:

Faulty Rail Freight Analysis Commissioned by GRTA

In its application for adverse abandonment of Mendocino Railway's federal freight rights, GRTA commissioned a dubious railroad freight study for the Willits-Ukiah-Cloverdale route.

The firm that completed the analysis for GRTA stated on the MarieJonesConsulting.com website that Ms. Jones has 30 years of experience in planning, economic development, coastal development, market analysis and grant writing. While Ms. Jones appears to have impeccable credentials and experience regarding various urban planning, zoning, housing, economic development/feasibility, mixed use, and related planning projects, the only transportation project listed was the Fort Bragg Coastal Trail.

TRAC sees no evidence that the firm is qualified to perform freight rail market analysis and similar logistics analysis. The study's conclusions should not be relied on, especially as they were limited to only Willits to Cloverdale, when that section would never be restored without connecting it to the national network. The too-local scope of analysis guaranteed that MR would be seen to have no future hauling freight. This "study" was a hit piece.

The methodology used for calculating potential freight demands is unlike freight demand studies done in the railroad consulting industry. It is invalid to rely on total area population factored by per-capita factors such as total demand for short-haul freight rail trips.

This approach captures only the demand side of logistics, while ignoring production. For an area with substantial timber processing and finished lumber production like Mendocino, the operative factor would be total production, then applying the likely share of products that ship by rail. Traditionally, finished lumber has had a large percentage shipped by rail due to its bulk and weight.

A national average per capita demand for freight factored by population is not a substitute for a detailed evaluation of the market for specific shippers in the area, not only for finished lumber but also for other commodities such as wood chips, aggregates, etc.

In a further unprofessional effort to cast aspersions, the consultant concluded that Mendocino Railway was deceptive about the potential for short-haul freight rail in obsolete documents, rather than the relevant one:

“...MR consistently overestimated interest in short haul rail shipments in their DOT Build Applications (see Appendix A), such that the over-estimates can fairly be characterized as deceptions.” (page 8).

Here, the consultant is referring to the 2020 grant applications that were incorrectly made to the Federal Transit Administration (FTA) rather than the Federal Railroad Administration (FRA). Because Mendocino Railway has now obtained an RRIF loan, a legitimate analysis would have reviewed that loan application, not a denied grant.

Choice of Potential Shippers to Interview

A small local beer distillery, a small chemical company, and a small finished lumber producer are not representative of much larger potential shippers, such as the remaining sawmills, and potential reload traffic from Humboldt and Del Norte Counties. This alone makes the study's conclusions invalid.

While the study is correct that hauling of raw logs to the mill by rail went out of common use when logging railroads were replaced by trucks, the study completely ignores the shipping of finished lumber. For Mendocino County, with its long history of logging, this is not merely preposterous--it must be considered an intent to mislead the Board.

MR Evidence of Established If Modest, Freight Volumes

That is, about 400 carloads of raw logs for one of its logging customers for many decades; a second customer has expressed interest in moving 400-500 carloads of aggregate (gravel). The consultant failed to consider Mendocino Railway's plans for a transloading facility (not a campground as alleged by some) to carry traffic such as timber and aggregate. A restoration of the GRTA Line would enable a transload facility to capture a portion of lumber and other bulk commodity traffic originating in Del Norte and Humboldt Counties.

For the record, the four North Coast counties (Del Norte, Humboldt, Mendocino, and Sonoma focused on Cloverdale) produced almost 400 million board feet of lumber in 2020, according to <https://gis.data.ca.gov/datasets/CDTFA::ca-timber-production-statistics/explore>.

This is an annual volume of 5,000+/- equivalent lumber carloads assuming 80,000 board feet per car; presumably a large share of these shipments could be captured, including Del Norte/Humboldt loads via a potential reload facility in Willits, particularly for shipments to Southern California (at the 500-mile threshold) and out-of-state. There is also potential for other commodities, such as aggregate for the Bay Area construction and roadway market. The method of national averages applied to Mendocino County ignores MR's potential for longer distance intra-California (e.g., to the Los Angeles and San Diego regions) and interstate freight traffic.

TRAC chose to not closely investigate the numbers in the feasibility analysis, as the conclusion was so preposterous that the analysis had to be severely flawed: "Even with the award of a \$31 million low interest federal loan, rail freight is still not competitive at a price of \$57,450/railcar or \$900/ton, which is 2,346% more expensive than trucking." (page 21.)

Feasibility Analysis--Breakeven Analysis

While only a side note in the STB proceedings, it is important for the Board to notice that Mendocino Railway is successfully rebuilding its tourist excursion business after Covid. For example, the Skunk Train served 70,000 passengers in 2022 and 100,000 in 2023 (e.g., about 70,000 in 2023 from Willits, which is not the most "touristy" part of Mendocino County). There is a potential for 5%--7% of annual Mendocino County visitors to arrive by train. This could be 90,000-135,000 tourist arrivals by train, respectively.

Keeping in mind the very high prices that the Napa Valley Wine Train and Skunk Train are able to obtain from visitors (\$250-\$800 for a 32-mile round trip, and \$50 for 7-mile and \$65 for 14-mile round trips, respectively) it appears that tourist trains to/from the Bay Area (with a SMART connection) might be more important than carload freight traffic in the long run. There is no reason why a breakeven analysis should be restricted to only the freight side of the operation.

Exaggerated Benefits Claimed for Trail

GRTA's claims of trail usage in the range of six to nine million annually (Draft Great Redwood Trail Plan, Appendix A, pages 6-7: <https://greatredwoodtrailplan.org/>) are observably exaggerated, compared to actual usage on existing recreation trails in California. For example, the 28 miles of rail-trail segments completed so far along the Sonoma-Marín Area Rail Transit (SMART) route collectively serve about 800,000–900,000 annual users (with roughly 650,000 residents living in the SMART corridor, e.g. excluding the Sonoma Valley, Russian River area, and West Marin County. Trail usage is reported monthly to the SMART Board - <https://sonomamarintrain.org/bod>).

In the Sacramento urban area with about 2 million residents, the American River Parkway hosts about 5 million annual users. Relative usage in established tourist areas is significantly higher. The Napa Valley Vine Trail attracts about 1.5 million annual users, an estimated 20%-30% being visitors (300,000–400,000 visitor users, 8%-10% of 3.8 million annually).

On the Monterey Peninsula, the Monterey Bay Recreation Trail in the Cities of Monterey and Pacific Grove attracts about 1.5 million users, of which approximately two-thirds are visitors. Based on this, about 20% of visitors use the trail, located in the prime tourism areas of downtown Monterey, Cannery Row, and adjacent to the Monterey Bay Aquarium (in contrast, the Napa Valley Vine Trail is not yet completed to the prime tourism area extending north from Yountville to Oakville, St. Helena, Calistoga, and rural destinations in-between including wineries).

Economic Benefits of Auto-Free Visitor and Other Transportation

With its purported emphasis on creating economic activity, GRTA has surprisingly failed to consider the potential impact of adverse abandonment on MR's freight and passenger services, which are an auto-free economic engine for Mendocino County. Significantly, MR's existing line between Willits and Fort Bragg, commonly known as the "Skunk Train," is the top commercial tourist attraction in Mendocino County. If GRTA agreed to have MR restore the tracks between Willits and Cloverdale, perhaps in exchange for freight rights and the construction of a pathway, the economic impact would greatly exceed that of a trail alone.

A recent study, the Vallejo Passenger Rail Study, found that connecting the Napa Valley to Vallejo Ferry Service operating from San Francisco could attract more than 1,000 visitor trips daily in summer (<https://sta.ca.gov/wp-content/uploads/2023/10/Vallejo-PRS-Final-Report-FINAL-2024-05-10-PDF.pdf>, p.63). In an earlier public presentation, the study consultants estimated there could be 1,000–1,500 visitor trips daily, as an annual average. That is, 365,000–548,000 annual visitor trips via the ferry to the Napa Valley. Assuming one-way trips results in a potential of 182,500–274,000 annual rail trips by visitors. This is 5%–7% of all Napa Valley visitors.

Applied to the 1.8 million estimated annual Mendocino County visitors, this figure suggests 90,000–135,000 trips to Mendocino County might be attracted. This is in the same ballpark as the 100,000 annual riders currently attracted by the Skunk Train. These figures are also consistent with a weekend rail service that operated between Healdsburg and Willits prior to FRA's closure of the line circa 2000. The latter service reportedly attracted 500–600 passengers per trip.

Conclusion

In my professional opinion, the Marie Jones Report is worthless as a freight rail study, and deserves being given zero weight as evidence.

TRAC strenuously opposes GRTA's Application. We urge the Surface Transportation Board to encourage freight hauling by rail in Mendocino County via the historic Mendocino Railway by denying adverse abandonment.

Verification

Pursuant to 28 U.S.C. 1746, I declare and verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief. Further, I certify that I am qualified and authorized to file this Verification.

Very truly yours,

A handwritten signature in black ink that reads "Michael R. Petty". The signature is written in a cursive style with a large, stylized "M" and "P".

President, Train Riders Association of California (TRAC)

Exhibit 3

**Michael R. Strider, P.E.
2410 Hidden Valley Drive
Santa Rosa, CA 95404**

I have reviewed the Andersen Report related to the analysis and costs for placing the former Northwestern Pacific (NWP) railroad line between Cloverdale and Willits back in service to FRA safety class 1 condition. The following are my brief comments:

- Noted that this is for FRA safety class 1. Freight 10 mph, PSGR 15 mph.
- Tunnel #5 (Cloverdale) has been worked on and cleared by Golden Gate Railroad Museum volunteers.
- Some of the upgrades to public crossings may not have to be done as the CPUC has not done a diagnostic.
- Private crossings are NOT public crossings unless the roadway is a public crossing and the CPUC has made a legal change.
- Crossties at \$275 installed each is a little high. Should be less. Too expensive for that quantity. Note that for Class 1 status, No.1 relay ties can be used to save at least half the costs, and more of them can be used.
- Surfacing and lining are not required on the entire route for development of FRA class 1 track. It is needed mostly in areas that need reconstruction.

The report overall is very detailed and the particular areas of repair and maintenance are bona fide with the exception of some quantities and cost items mentioned above and the track and tunnel south of the Mendocino/Sonoma line as a result of GGRM upgrades and cleanup on SMART-owned right-of-way.

I am a former North Coast Railroad Authority (NCRA) Chief Engineer and have over 50 years of employment in the railroad industry including six common carriers. I am a registered Civil Engineer in the state of California.

Verification

Pursuant to 28 U.S.C. 1746, I declare and verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief. Further, I certify that I am qualified and authorized to file this Verification.

A handwritten signature in blue ink, appearing to read "Michael R. Strider".

Michael R. Strider, P.E.

June 10, 2024