

Round Valley Area Municipal Advisory Council
PO Box 372 Covelo, CA 95428
"Serving the People of the Greater Round Valley"

June 10, 2024

Elaine Hogan, Executive Director
Great Redwood Trail Agency
419 Talmage Road, Suite M
Ukiah, CA 95482

Re: PEIR comment

Dear Ms. Hogan:

We ask that the Great Redwood Trail Agency provide the funding to develop two (and possibly three) reasonable routes for consideration in the PEIR process for the trail sections between the incorporated towns of Willits and Rio Dell, particularly within the Eel River Canyon.

Alternative routing would allow the ability to bypass sensitive cultural sites, environmental remediation work, trail failures and other temporary closures, as well as time to consider and implement healing around issues of genocide carried out by the citizens and state of California and US Federal troops. In particular, concerns about Native cultural site integrity and Native community historic healing, animal and plant community restoration, environmental remediation of past railroad damage (earth and stream alteration, construction material and industrial equipment, toxic residues both known and unknown), soil and geologic issues, weather patterns and weather extremes, seasonal closures for both cold wet times and fire seasons, and consideration of actual community benefit should be given adequate attention and space throughout the life of the proposed project. Realistic alternative routes would allow such attention and space.

Just as other aspects of the PEIR are executed by a contracted agency, we ask that alternative route proposals be contracted out, in this case to a locally knowledgeable, inclusive and responsive entity. Local knowledge, especially Traditional Ecological Knowledge (TEK), but not solely TEK, would be extremely valuable in creating viable alternatives in these remote rural regions of Mendocino, Trinity and Humboldt Counties. We request that this part of the PEIR be contracted under the

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umbrella of a local tribal government or a community nonprofit of tribal, state or federal charter.

The process of producing viable alternative routes is central to making a Redwood Trail that is truly “great”.

The format and time period for this public comment prevented the RVAMAC and many similar organizations and communities from providing fully considered public comment on this PEIR. The time frame is too short. We would like to thank you and the GRTA very much for providing the expanded time frame for this limited comment.

A Round Valley community member has spoken to staff at the Surface Transportation Board (STB) and has been advised that, with consent of the GRTA, the rail-banking decision allows for Public Use other than trail construction. Actions such as environmental remediation and healing from historic trauma, as well as limited use of any existing or constructed trail or recreational facilities where appropriate would not require a revised decision by the STB. Should the GRTA choose to consider that such a proposed alternative Public Use is beyond the scope of their rail-banking agreement, we have been advised that, within the framework of continued responsibility for the right-of-way, the STB would likely grant such a request to modify the agreement if needed. A review of the National Trail System Act by the Congressional Research Service also indicates that *“(t)rail uses on nonfederal lands—whether scenic, historic, recreation, or connecting trails—are typically controlled at the state and local levels. Agencies have generally interpreted NTSA in a manner that considers all trail management activity on nonfederal land to be voluntary and that designation of a national trail, unless otherwise specified in law, does not place any restrictions or requirements on private landowners. Uses on nonfederal trail segments may still be limited through cooperative and certification agreements, easements, and actions by a range of entities, including nonprofit organizations. The terms of these legal agreements generally accord with NTSA and provide for the use of lands for trail purposes.”*

Thank you for your kind attention.

Kay Richards

Secretary

Round Valley Area Municipal Advisory Council

. cc: Clerk of the Mendocino County Board of Supervisors
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Supervisor John Haschak
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