



December 1, 2025

Santa Cruz County Regional Transportation Commission (RTC)
1101 Pacific Avenue, Suite 250
Santa Cruz, CA 95060

RE: Oppose Railbanking and Rail Abandonment On Existing and Active Rail Lines in Watsonville

Dear Commissioners,

Your Commission will be discussing the issue of potential railbanking on the Santa Cruz Branch Rail Line. Big Creek Lumber Company reiterates our commitment to retain our decades-long rail freight service at our Watsonville retail store located at 1400 W Beach Street. Our company purchased this property 50 years ago specifically because it had a railhead. We have continuously paid for rail freight delivery since we purchased this property and continue to do so. It is a business transaction that constitutes interstate commerce.

It is our understanding that a rail line abandonment request would have to be presented to the Federal Surface Transportation Board (STB) and would have to occur prior to any request to pursue railbanking. Big Creek Lumber Company has legal standing with the STB and we will formally oppose any request to abandon or railbank the existing active rail lines in Watsonville

Big Creek Lumber Company does not take a position on the rail lines north of Watsonville. Thank you for considering our concerns.

Sincerely,


Bob Berlage
Communications Director





November 30, 2025

Santa Cruz County Regional Transportation Commission
1101 Pacific Avenue, Suite 250
Santa Cruz, CA 95060

Commissioner Montesino and Commissioners:

In light of the Commission's consideration of the issue of railbanking, Roaring Camp would like to provide its input on the construction of Segments 9 to 11 of the Coastal Rail Trail over portions of the Santa Cruz Branch Rail Line (Branch Line).

First, we note that RTC's agreement, the Administration, Coordination and License Agreement (ACL), is with Progressive Rail Incorporated (Progressive), not Roaring Camp. Any arrangement that impacts the future of rail operations on the line necessarily needs to involve Progressive. Roaring Camp, through its subsidiary, the Santa Cruz, Big Trees and Pacific Railroad, operates heavy rail service between Santa Cruz and Felton, where Roaring Camp's narrow-gauge steam railroad operates. A portion of that service is operated over the Branch Line. Roaring Camp's primary interest in the future is maintaining its status as a common carrier connected to the national rail system and hopefully being able to move freight on the line once the Branch Line is rehabilitated. Another related issue is that, in order to get rail equipment to its lines, it needs to use the Branch Line. Local roadways simply do not offer sufficient clearance to allow this equipment to move by truck. In addition to these interests, we would like to see the RTC continue to take steps toward revitalizing the Branch Line for passenger rail service and excursion service. As a community member, Roaring Camp is concerned with the challenges the community faces in dealing with increasing traffic congestion and the potential for the Branch Line to provide rail service to address it.

Some history is relevant here. When Roaring Camp purchased the Santa Cruz to Felton rail line from Southern Pacific in 1985, it received a "right of first refusal" to acquire the Branch Line. When RTC, using state bond funds specifically earmarked for rail transportation, sought to acquire the line, Roaring Camp agreed to waive this right in order to allow the purchase to move ahead. At the time, it looked forward to the RTC repairing and maintaining the line to allow a mix of passenger and freight service to operate. Unfortunately, despite agreements with several different freight carriers, RTC has never brought the line into operating condition.

We must note that RTC has never fulfilled its obligations under the ACL to repair the line and put it into operable condition, save a very small segment in the Watsonville area. Funds that could have been used to maintain and repair the line have instead been put to other purposes, with a focus on the long-term development of passenger service taking priority over the near-term goal of putting the line into condition for freight operations. We find it disingenuous that

RTC is now pointing to the lack of freight service as a potential means to threaten the termination of the agreement with Progressive.

While RTC has obtained a very generous grant from the state to construct the Coastal Rail Trail, it underestimated the cost of implementing the project it promised to the state as a condition of that grant. It now must either reduce the size of the project or reduce its cost. It is now considering whether to reduce that cost by sacrificing the prospects for rail development by removing the rails and building a bicycle facility in their place. This potential decision is being made in a hurried fashion, which we think does not properly consider the views of the community nor the long-term consequences of placing a public facility on top of the rail right-of-way in place of the track facilities. We view the Branch Line as an irreplaceable asset that should not be squandered to address an immediate funding crisis.

We therefore ask the Commission to consider an approach that maximizes the use of grant funds while leaving the rails in place [to the extent feasible]. This would involve completing Segment 9 with the aid of a federal Safe Streets grant using the Ultimate Rail design. Segment 10 would then be built, also in the Ultimate Rail configuration, using the ATP grant. Segment 11, which is encumbered by Capitola's Measure L restrictions, might only be built south of the City's in the vicinity of State Park Drive. This version provides a compromise that has a greater chance of being embraced by the community. In addition, it saves considerable cost to the Cities and County in the future by preserving both the trail and rail from Davenport to 47th Ave.

Roaring Camp has been willing to consider the options to allow the trail project to proceed, even to the point of volunteering to assist, at Roaring Camp's own expense, to relocate tracks in this effort. Any plan that involves removing the tracks over a significant portion of the line is one we do not support and one to which we have never assented. If the tracks were to be removed, it will cause permanent damage to the Santa Cruz community by placing nearly insurmountable obstacles to the reestablishment of rail service in the County by shifting the cost of relocating the trail on any future rail project. In addition, it was the overwhelming view of the voters in the Measure D election in 2022 to retain the rails for future development and not remove them to build a trail.

We note that the ACL runs through 2028 and that any change in the legal status of the Branch Line would require the approval of the federal Surface Transportation Board. Railbanking or any other effort to remove tracks would necessarily threaten the status of our line to Felton.

We believe any decision that will permanently block the future development of the rail line requires a full public discussion. We urge you to open a full dialogue that permits a thorough vetting of the RTC's potential regulatory filings, design plans and cost estimates in hopes of settling upon an approach that respects the wishes of the community regarding future rail development, yet provides the community with a useful portion of the Coastal Rail Trail.

Sincerely,

Melani Clark
CEO, Roaring Camp Railroads

From: [Tom Kellogg](#)
To: [Regional Transportation Commission](#); [REDACTED]
[REDACTED]
[REDACTED]
Cc: [REDACTED]; [Brian Peoples](#)
Subject: 12/4/26 RTC; Railbank Now and Build Trail Without Train
Date: Monday, December 1, 2025 9:27:33 PM

RTC:

The train will take several decades before it opens so I fully support railbanking and building the interim trail to be open for use during the intervening decades.

I understand that RTC Commissioners Fred Keeley and Manu Koenig have developed a practical solution that I fully support.

I have bicycling nearly 7 decades and we have an amazing gem of a trail possibility in our county.

Please be reasonable and railbank now so we can have a beautiful trail now. Possibly, many decades in the future, build a passenger train if it becomes realistic then.

Kind Regards,

Tom Kellogg [REDACTED]

Aptos

SCC Greenway: https://sccgreenway.org/?utm_term=0_40e12da381-8659859888-81281975

Trail Now: <https://www.trailnow.org/>

Railbanking: <https://www.railstotrails.org/trail-building-toolbox/railbanking/>

From: [Donald Schwartz](#)
To: [Regional Transportation Commission](#)
Subject: Agenda Item 25 - 12/4/25 Rail Banking Overview
Date: Sunday, November 30, 2025 10:47:47 PM

To RTC,

Please adopt the Trail Now proposal for the above agenda item.

Dropping the ball now will cost Santa Cruz taxpayers tens of millions of dollars. Join the Keely -Koenig Compromise.

Thank you.

Donald Charles Schwartz, M.B.A., J.D.
Law Office of Donald C. Schwartz
[REDACTED]
Aptos, CA 95003
[REDACTED]

Sent from iPhone

From: [Carey Pico](#)
To: [Regional Transportation Commission](#)
Subject: Item 25: Railbanking could be the RTC's Plan B.
Date: Tuesday, December 2, 2025 10:19:57 PM

The RTC MBSST needs a Plan B and that is railbanking. If the "Peace Plan" does not materialize, the CTC's ATP program may find the RTC's realistic pursuit of railbanking substantial enough to retain the \$103M grants towards Segs. 8-11 while the process works through.

Fact: Since 1996 when the STB was founded roughly 2.5% of all abandoned rail lines were railbanked. The other 97.5% were abandoned outright with no possible return to rail service. Those 2.5% railbanked lines were slated for abandonment specifically because there was and still is no need for rail freight service on those rail lines. Because they are railbanked, they remain viable for return to rail service if and when it is economically viable.

Opponents of railbanking state that almost no railbanked lines have been reactivated to a rail freight line. Yes, that's true. But one must ask why so few railbanked lines have returned to rail freight service? Because their reactivation would lead to a negative cash flow with no path to financial viability, not because they are railbanked and being used for a trail. In fact, all it takes to reactivate a railbanked is for a freight railroad to convince the STB that it has the financial wherewithal to sustain a profitable outcome. The problem is, the circumstances that lead to a rail line being abandoned rarely change. So please don't fear trying to rail bank the SC Branch line with that misinformation it leads to abandonment.

I was told by an STB staff attorney a decade ago that our coastal SC Branch line would easily be approved for interim trail status with one caveat. Dealing with the Felton feeder line. In short, the STB will never allow an active feeder line to be cut off from the national network, even if that connecting line (our SC Branch line) is defunct and too expensive to repair. For that reason, to move forward with railbanking here, the RTC must get the Felton line (i.e., Roaring Camp's freight subsidiary, SCBG) to abandon its freight service option to the national network (even though it can't get there). Roaring Camp/SCBG would still be able to run freight on its line (if it ever had any). It just wouldn't have STB active freight status. Similarly, Roaring Camp's passenger service would not be affected.

Getting Roaring Camp to abandon its rail freight line on its own may require paying Roaring Camp a substantial amount of money on the order of millions. This may be the most cost- and time-effective way to accomplish this and, thus, railbank the SC Branch line. Alternatively, the RTC could file an adverse abandonment effort with the STB. It is unknown if the STB would approve abandoning a feeder (Felton) line in order for its main connecting (SC Branch) line to become railbanked for a recreational trail. The STB, up until recently, has never had such a request filed. The one filed case is from the State of

California's Great Redwood Trail Authority tasked with creating a 307-mile rail-trail between Eureka to Larkspur. Its one impediment is located at Willits where, just like here, the Skunk Train's sister freight railroad Mendocino Railway is intent on keep the unused Ft. Bragg to Willits feeder line. The case has dragged on with interruptions of federal funding issues and civil suits that has kept the STB from completing its decision.

It would be wise for the RTC to pursue railbanking the SC Branch line north of Watsonville and simultaneously filing an adverse abandonment of the Felton line. There are no STB costs to the RTC because the STB waives all fees for public fees if requested. All the STB deciding factors are in the RTC's favor: 1) no rail freight or customers, 2) rail line connection to the network is out of service and too expensive to repair, and 3) no potential shipping customers complaining to the STB that SCBG or SPP will not serve them. The public convenience and need (PC&N) is substantial for moving forward with the MBSST given the funds that are available. But understand, the process would take about 6 months of preparation before filing. Once filed, the decision could be as short as 3 months for approval.

BTW: "railbanking" and "rail banking" are both correct forms.

Carey Pico, Ph.D.
Aptos, CA

From: [Steven Graff](#)
To: [Regional Transportation Commission](#)
Subject: Public Comment on Dec 4, 2025 – Agenda Item 25: Railbanking Overview
Date: Sunday, November 30, 2025 1:48:16 PM

Dear Chair and Commissioners,

I am writing as a Santa Cruz County resident and regular user of the rail corridor and existing trail segments to comment on Agenda Item #25: Railbanking Overview for the December 4, 2025 RTC meeting.

First, I want to acknowledge the extensive work that has gone into the Zero Emission Passenger Rail & Trail (ZEPRT) Final Project Concept Report, released in October 2025. That report, along with recent staff analyses and media coverage, makes it clear that while zero-emission passenger rail is an aspirational long-term vision, it also carries very high capital and operating costs and significant funding uncertainty—on the order of billions of dollars and likely requiring new tax revenue. SCCRTC+1

At the same time, the community has already secured well over \$100 million in grant funds for Coastal Rail Trail Segments 8–11 and related multimodal projects between Santa Cruz and Watsonville, funding that is now at risk because the current rail-with-trail designs are proving unaffordable and difficult to deliver. SCCRTC+2 Lookout Santa Cruz+2 This places both our mobility goals and our fiscal credibility with state and federal partners in jeopardy.

Given this context, I respectfully urge the Commission to take the following actions on Item 25:

1. Make Railbanking the Official Corridor Preservation Strategy

Please formally adopt railbanking of the inoperable freight segments of the Santa Cruz Branch Rail Line (SCBRL) north of Watsonville as the RTC’s preferred preservation strategy.

Railbanking is specifically designed to protect railroad right-of-way for possible future rail service while allowing interim use as a trail or other transportation facility.

By choosing railbanking as the official policy, the Commission can:

- Preserve the SCBRL corridor for any future rail opportunity;
- Enable near-term, high-value transportation use as the Santa Cruz Coastal Trail; and
- Reduce ongoing costs and liabilities of maintaining an unused and deteriorating freight line.

This approach is entirely consistent with the RTC’s original goal when it purchased the SCBRL: to protect the corridor for transportation uses that serve the public. SCCRTC

2. Direct Staff to Initiate the Railbanking Process with the STB

I ask the Commission to direct staff and legal counsel to begin the formal railbanking process with the Surface Transportation Board (STB), including:

- Working toward a cooperative abandonment with the current common carrier (Progressive Rail);
- Preparing the necessary STB filings, including environmental and historic documentation and a Petition for Interim Trail Use; and
- If Progressive Rail is unwilling to cooperate, directing staff to pursue RTC status as common carrier for the SCBRL in order to move forward with railbanking and interim trail use.

The community has been debating the future of this corridor for more than a decade; it is time to move from discussion to action on a legally durable path that both protects future rail

options and delivers a trail in the near term.

3. Advance the Coastal Trail as the Interim Use on the Railbed (Segments 8–11 and South)

I support staff's recommendation to advance an Interim Trail concept for Segments 8–11, and I urge the Commission to go one step further and:

- Place the trail on the rail alignment (trail-on-railbed) instead of constructing a costly and complex rail-with-trail configuration; and
- Apply the same railbed-based trail approach to the southern segments.

RTC staff have already reported that an interim trail on the railbed could reduce costs for Segments 8–11 by roughly half, while still delivering a high-quality active transportation facility.

Segments 8–11 alone will serve some of the densest parts of the county, connecting schools, parks, beaches, and neighborhoods from the Boardwalk through Live Oak and Capitola to Seacliff. Making these segments safe and accessible now—on the existing rail alignment—will have immediate benefits for kids walking and biking to school, commuters, seniors, families, and visitors.

4. Protect the Secured Trail Grants

I ask you to explicitly direct staff to prioritize trail configurations that preserve the approximately \$120 million in active transportation and related grants tied to the Coastal Rail Trail and the Watsonville–Santa Cruz multimodal corridor.

If rail-with-trail concepts are proving infeasible at current cost levels, then the fiscally responsible choice is to adjust the project—via railbanking and trail-on-railbed designs—so that:

- The projects remain buildable within available funding; and
- The County does not risk losing major grants or undermining its credibility with the California Transportation Commission and other funders.

5. Pause Additional ZEPRT Spending Until a Realistic Funding Path Exists

The ZEPRT Final Project Concept Report is an important milestone, but it also underscores how far we are from a fully funded, constructible passenger rail project. Estimated costs in the multi-billion-dollar range, potential need for a new sales tax measure, and ongoing operating subsidies are all significant hurdles.

I urge the Commission to suspend new discretionary expenditures on passenger rail planning and further ZEPRT expansion unless and until:

- A realistic, voter-supported funding strategy is identified;
- Necessary state and federal partners signal substantial financial participation; and
- Legal, environmental, and operational uncertainties are substantially resolved.

In the meantime, resources should be focused on the deliverable, funded portions of the Coastal Trail and other near-term multimodal improvements.

Priority Near-Term Actions for the Interim Trail

To accelerate delivery of tangible benefits, I also support incorporating the following items into your implementation plan:

1. Repurpose the Capitola Trestle for trail use as part of a railbanked corridor. This single project would unlock a critical gap and create a continuous, safe active transportation route through Capitola.
2. Repurpose the Santa Cruz Boardwalk trestle for trail use, creating a seamless connection into the city's core and to existing Segment 7.
3. Advance a temporary trail solution across the Aptos Highway 1 overpasses, paired with a clear plan and timeline for a permanent pedestrian/bicycle overcrossing, so that Aptos is not left as a long-term "hole" in the system.
4. Begin removing rails and ties and constructing a preliminary stone-dust or decomposed granite trail between Watsonville (Lee Road) and Aptos (Segments 13–17). Even a compacted base-rock facility would immediately improve mobility, recreation, and safety, especially for communities in south county that often have fewer transportation options.
5. Bring the existing Coastal Trail segment near Palm Street into full ADA compliance to ensure that people of all ages and abilities can use the corridor safely and equitably.

For many years, the public has been promised a continuous Coastal Rail Trail from Davenport to Watsonville. Today, small segments are open or under construction, but the overall network remains fragmented, and key funded segments are stalled. Meanwhile, traffic, safety concerns, and climate imperatives continue to grow.

By adopting railbanking as the official preservation strategy, moving ahead with an interim trail on the railbed, and protecting our hard-won trail grants, the RTC can:

- Deliver real, near-term transportation and safety benefits;
- Honor the original promise of a county-wide trail within reach of a majority of residents; and
- Still preserve the option of passenger rail should a viable funding and operating plan emerge in the future.

Thank you for your service and for considering these comments. I appreciate the Commission's work and urge you to choose a path on Agenda Item 25 that is fiscally responsible, legally durable, and responsive to the community's longstanding desire for a connected Coastal Trail.

Sincerely,

Stven Graff

Aptos - Mar Vista Elementary neighborhood

Daily bike commuter and parent of kids who would use the trail

From: [Kyle Jordan](#)
To: [Regional Transportation Commission](#)
Subject: RTC Commissioners railbanking vote NO
Date: Friday, November 21, 2025 3:02:49 PM

Hello, please forward this message to RTC Commissioners.

Hello Commissioners,

As you make some big decisions about the future of the Santa Cruz Branch Rail Line, I'm asking you to zoom out and think about where we want transportation in this county to be 10, 20, even 50 years from now — and to be very cautious about rail banking.

From where I sit, we don't really have a good alternative to pursuing passenger rail. Highway 1 traffic is only going to get worse. More and more people who work in North County are getting pushed farther south because they simply can't afford to live here. I've spent the last two years commuting from Santa Cruz to Salinas, and it's made it crystal clear that this isn't just our county's problem — it's regional. People can't afford Watsonville or Salinas anymore and are moving to Soledad and beyond. A lot of those folks still drive into Santa Cruz every day for jobs in hospitality, agriculture, or at UCSC — jobs that can't be done remotely and aren't disappearing.

I know the price tag for passenger rail is intimidating. But instead of walking away, I'd urge you to direct staff to find ways to scale it, phase it, or rethink it so we can get meaningful service for less. A value-engineering study of HDR's cost estimate feels like the obvious first step if we want to find realistic ways to bring costs down.

On rail banking — I get why the idea is appealing. I want to see the trail built too. But I'm worried that rail banking could trigger lawsuits and end up slowing the trail instead of speeding it up. I'd also encourage you to talk with TAMC about the situation they just had to navigate with the Monterey Branch Line. Their purchase agreement required them to implement rail within 10 years; because that didn't happen, they were on the hook not just for the original purchase price but the *current market value* of the corridor. They were lucky they could negotiate a deal because they're actively working on other rail projects. If we rail-bank our corridor, the RTC could easily end up in the same position — needing to repay far more than the original \$12M purchase price.

So the question is: what do we want Santa Cruz County to look like in 2050? Do we want a future where it takes 90 minutes or more to get from Santa Cruz to Watsonville? Where thousands of people sit in endless traffic every day? Or do we want a system where a train connects seamlessly to a bus or a shared bike — quickly, reliably, and for less than the cost of a cup of coffee?

These projects take time. The important thing is that we keep taking steps forward. I'm asking you to keep that long-term vision in mind, pursue a value-engineering study to find realistic ways to make rail more affordable, and make decisions that move us toward the kind of community we actually want to live in.

Best,

Kyle Jordan

From: [Suzanne Cochran](#)
To: [Regional Transportation Commission](#); [Clark Cochran](#); [Suzanne Cochran](#)
Subject: RTC Dec 4 Meeting - Item 25
Date: Tuesday, December 2, 2025 10:31:46 AM

Dear RTC Commissioners,

It is time to move on with a solution within the current budget since there are not enough funds to pay for the Ultimate Trail/Rail. NO MORE TAXES!

See recommendations below from Trail Now that I support.

Trail Now respectfully urges the Commission to direct staff to immediately initiate design work for Interim Trail along Segments 8-11, as well as initiate railbanking of the Santa Cruz Branch Rail Line (SCBRL) north of Watsonville. Also, we request that the RTC vote to make railbanking the SCBRL as the official corridor preservation strategy. Railbanking will preserve the right-of-way for potential future rail while enabling interim use for transportation purposes—most notably the Santa Cruz Coastal Trail.

We request that the Commission take the following actions:

1. Adopt Railbanking as the RTC's Official Preservation Strategy

Formally direct staff to prioritize railbanking for the inoperable freight segments of the SCBRL north of Watsonville to preserve the corridor for potential future rail use while allowing for interim transportation uses, including the Coastal Trail.

2. Initiate Railbanking Process with the Surface Transportation Board (STB)

Direct staff and legal counsel to pursue cooperative abandonment with the current common carrier (Progressive Rail) and prepare all documents required by the STB to begin the railbanking process, including environmental consultations, historical documentation, and a Petition for Interim Trail Use. If Progressive Rail attempts to block the repurpose of the railline to a trail, RTC staff shall work to become Common Carrier of the SCBRL to allow for immediate transition to a trail.

3. Advance the Coastal Trail as the Interim Use on the Railbed

Direct RTC staff, the County, and the City of Santa Cruz to redesign Segments 8–11 and all southern segments to place the trail on the rail alignment, rather than adjacent to active tracks, consistent with a railbanked corridor and cost-efficient implementation.

4. Protect Secured Grant Funding

Authorize staff to pursue trail configurations necessary to preserve approximately \$120 million in secured grant funds currently at risk due to the unaffordable cost structure of rail-with-trail designs.

5. Suspend Further ZEPRT-Related Expenditures Until Funding is Fully Identified

Pause further investment in passenger rail planning unless and until sufficient funding for engineering and environmental compliance is secured and a financially and legally viable path forward has been identified.

PRIORITY ACTIONS FOR INTERIM TRAIL IMPLEMENTATION

In addition to proceeding with the Interim Trail for Segments 8–11, Trail Now requests that RTC incorporate the following actions into the implementation plan:

1. Proceed with repurposing the Capitola Trestle for trail use.

2. Proceed with repurposing the Santa Cruz Boardwalk Trestle for trail use.
3. Advance construction of a temporary trail across the Aptos Highway 1 railroad overpasses, with an approved plan to replace the temporary facility with a permanent pedestrian and bicycle overcrossing prior to removal.
4. Initiate removal of rails and ties and construct a preliminary stone-dust, decomposed granite or other base rock material type trail from Watsonville (Lee Road) to Aptos (Segments 13–17) to deliver immediate mobility, recreation, and public safety benefits.
5. Bring the existing Coastal Trail segment adjacent to Palm Street into full ADA compliance to ensure safe, equitable access for all users.

Our community has already endured significant delay in the delivery of the Santa Cruz Coastal Trail. While we support RTC’s recommendation to advance Segments 8–11, we strongly encourage adoption of the enhancements above to accelerate implementation, maximize public return on investment, and restore confidence in RTC’s commitment to delivering a connected trail system.

Regards,

Suzanne Cochran
Property Owner and Full-time Resident in Capitola, CA

From: [Brian Peoples](#)
To: [Regional Transportation Commission](#)
Cc: [REDACTED]
Subject: RTC Meeting: Item #25 (Railbanking Overview) and Agenda Item #26 (Zero Emission Passenger Rail and Trail Final Project Concept Report) f
Date: Friday, November 28, 2025 2:21:30 PM
Attachments: [image.png](#)

Dear Commissioners,

Trail Now submits the following formal recommendations regarding Agenda Item #25 (Railbanking Overview) and Agenda Item #26 (Zero Emission Passenger Rail and Trail Final Project Concept Report) for the Santa Cruz County Regional Transportation Commission (RTC) December 4th meeting.

ITEM 25 – RAILBANKING OVERVIEW

Trail Now respectfully urges the Commission to **direct staff to immediately initiate design work for Interim Trail along Segments 8-11, as well as initiate railbanking of the Santa Cruz Branch Rail Line (SCBRL) north of Watsonville.** Also, we request that the RTC vote to make railbanking the SCBRL as the official corridor preservation strategy. Railbanking will preserve the right-of-way for potential future rail while enabling interim use for transportation purposes—most notably the Santa Cruz Coastal Trail.

We request that the Commission take the following actions:

1. Adopt Railbanking as the RTC’s Official Preservation Strategy

Formally direct staff to prioritize railbanking for the inoperable freight segments of the SCBRL north of Watsonville to preserve the corridor for potential future rail use while allowing for interim transportation uses, including the Coastal Trail.

2. Initiate Railbanking Process with the Surface Transportation Board (STB)

Direct staff and legal counsel to pursue cooperative abandonment with the current common carrier (Progressive Rail) and prepare all documents required by the STB to begin the railbanking process, including environmental consultations, historical documentation, and a Petition for Interim Trail Use. If Progressive Rail attempts to block the repurpose of the railline to a trail, RTC staff shall work to become Common Carrier of the SCBRL to allow for immediate transition to a trail.

3. Advance the Coastal Trail as the Interim Use on the Railbed

Direct RTC staff, the County, and the City of Santa Cruz to redesign Segments 8–11 and all southern segments to place the trail **on the rail alignment**, rather than adjacent to active tracks, consistent with a railbanked corridor and cost-efficient implementation.

4. Protect Secured Grant Funding

Authorize staff to pursue trail configurations necessary to preserve approximately **\$120 million in secured grant funds** currently at risk due to the unaffordable cost structure of

rail-with-trail designs.

5. Suspend Further ZEPRT-Related Expenditures Until Funding is Fully Identified

Pause further investment in passenger rail planning unless and until sufficient funding for engineering and environmental compliance is secured and a financially and legally viable path forward has been identified.

PRIORITY ACTIONS FOR INTERIM TRAIL IMPLEMENTATION

In addition to proceeding with the Interim Trail for Segments 8–11, Trail Now requests that RTC incorporate the following actions into the implementation plan:

1. Proceed with repurposing the **Capitola Trestle** for trail use.
2. Proceed with repurposing the **Santa Cruz Boardwalk Trestle** for trail use.
3. Advance construction of a **temporary trail across the Aptos Highway 1 railroad overpasses**, with an approved plan to replace the temporary facility with a permanent pedestrian and bicycle overcrossing prior to removal.
4. Initiate removal of rails and ties and construct a **preliminary stone-dust, decomposed granite or other base rock material type trail from Watsonville (Lee Road) to Aptos (Segments 13–17)** to deliver immediate mobility, recreation, and public safety benefits.
5. Bring the existing Coastal Trail segment adjacent to **Palm Street into full ADA compliance** to ensure safe, equitable access for all users.

Our community has already endured significant delay in the delivery of the Coastal Trail. While we support RTC’s recommendation to advance Segments 8–11, we strongly encourage adoption of the enhancements above to accelerate implementation, maximize public return on investment, and restore confidence in RTC’s commitment to delivering a connected trail system.

ITEM 26 – ZERO EMISSION PASSENGER RAIL AND TRAIL (ZEPRT) REPORT

The ZEPRT report concludes that developing passenger rail along the Santa Cruz Coastal Corridor is **not financially viable**. More critically, the report fails to address whether passenger rail is even legally allowable within the coastal zone.

The study contains **no regulatory analysis or consultation with the California Coastal Commission (CCC)** regarding compliance with the California Coastal Act. Given the CCC’s extensive involvement in RTC projects—including Manresa Beach erosion mitigation (LCP-3-SCO-20-0066-2) and Davenport bluff armoring (CD-0001-21)—it is evident that any new rail construction in the coastal zone would be subject to substantial regulatory scrutiny.

Without CCC input, the ZEPRT report does not offer a complete or reliable evaluation of the regulatory, legal, or environmental feasibility of coastal passenger rail. Considering the **\$9 million cost** of the study, failure to address the Coastal Act framework constitutes a major deficiency that undermines the report’s credibility.

REQUESTED ACTIONS REGARDING ITEM 26

Accordingly, Trail Now respectfully requests that the Commission:

1. **Discontinue further pursuit of passenger rail planning** based on the ZEPRT study;
2. **Reallocate the \$1 million budget item to Santa Cruz Metro** to support proven transit solutions;
3. **Direct staff to conduct a formal review** of the ZEPRT procurement and deliverables to determine whether the consultant met the original contract requirements, including evaluation of regulatory feasibility; and
4. If contract deficiencies are confirmed, **pursue appropriate financial remedies**, including fee reduction or reimbursement.

Trail Now urges the Commission to act decisively to preserve the corridor, protect public investment, and deliver a Coastal Trail that serves the public now—while retaining future options through railbanking.

Best regards,

Brian Peoples



From: [Tina Andreatta](#)
To: [Regional Transportation Commission](#)
Subject: Railbanking — a clever ruse to financially benefit
Date: Monday, December 1, 2025 1:05:08 PM

Dear RTC Commissioners, City Council and Staff,

Railbanking is a clever ruse for commercial property developers, residential property owners, commercial property owners, and farmlands adjacent to the rail corridor to receive large sums of federal government payments for conversion of rail to trail.

Railbanking is often advertised as preserving the property interests of underused or unused rail for future use. The reality is property owners adjacent to railbanked land will actively and aggressively organize against converting railbanked land back to rail.

Here's three locations of railbanked lands that were paid large sums from the government.

1) Law firm Lewis Rice won \$17,859,000 in compensation for three landowners in St. Petersburg, Florida, who brought claims against the federal government. The claim resulted from the conversion of an abandoned 0.86-mile railroad easement in St. Petersburg into a public, recreational hiking and biking trail, which crossed on the landowners' property. On May 17, 2024, the United States Court of Federal Claims awarded just compensation to the landowners, which also includes interest from the date of the taking of their property to the date of payment. The interest will likely bring their total payment close to \$20 million—the largest trial decision from the U.S. Court of Federal Claims in a rail-trail conversion case. Additionally, with a payment of more than \$12.9 million, one of the plaintiffs in this case will receive the largest award ever granted to an individual landowner.

2) Raulerson, et al., v. United States: \$33 million for 260 property owners for a rails to trails in Beaufort, South Carolina.

3) Haggart, et al., v. United States: \$177 million for 253 property owners for a rails to trails in Seattle, Washington.

Santa Cruz County land values are extremely higher than the three above examples from Florida, South Carolina and Washington State.

Don't be fooled with misinformation — no railbanking.

Regards,

Tina Andreatta
Aptos, CA 95003

From: [Julie Maria](#)
To: [Regional Transportation Commission](#)
Subject: Re Dec 4 meeting- In favor of rail banking
Date: Saturday, November 29, 2025 10:46:36 AM

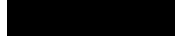
Hello

I am a long time resident of Santa Cruz Co and I live along the railroad tracks on Park Ave in Capitola.

After much consideration, I am in favor of the prioritized steps of the rail banking plan as iterated by the Trail Now group.

Thank you for your work and consideration,

Julie Madrona



Capitola

From: [Will Mayall](#)
To: [Regional Transportation Commission;](#) [REDACTED]
[REDACTED]
Subject: Response to Roaring Camp Railroads' November 30, 2025 Letter
Date: Tuesday, December 2, 2025 4:50:40 PM
Attachments: [Comments to RTC 12.4.25 Meeting.pdf](#)

Santa Cruz County Regional Transportation Commission
1101 Pacific Avenue, Suite 250
Santa Cruz, CA 95060

**Re: Response to Roaring Camp Railroads' November 30, 2025 Letter
Regarding Segments 9–11 and the Commission's Legal Options**

Commissioners:

Roaring Camp's letter (attached) is fundamentally inappropriate. It presents a series of claims that all rest on a single, improper premise: **that the RTC, and by extension the public, owes Roaring Camp a massive financial subsidy to rehabilitate the Santa Cruz Branch Line for Roaring Camp's private benefit.** This expectation has no basis in law, contract, public policy, or the facts on the ground.

Roaring Camp Is Expecting a Public Subsidy Exceeding \$1 Billion

Roaring Camp's letter makes explicit that its primary interest is *"maintaining its status as a common carrier connected to the national rail system and hopefully being able to move freight on the line once the Branch Line is rehabilitated."* This implies an expectation that the RTC should spend on the order of **\$1 billion or more** to repair or replace nearly all of the bridges and trestles identified in the ZEPRT concept materials, as well as to fund coastal bluff armoring in La Selva, Manresa, and possibly north of New Brighton State Park.

Such an expectation is unsupportable. Roaring Camp has no standing—legal, contractual, or historical—to demand that the RTC rebuild the SCBL to enable speculative freight or preserve a theoretical interchange that no longer exists. Freight demand has collapsed, Progressive Rail's projections proved baseless, and no evidence suggests the corridor could ever generate revenue sufficient to offset even a small fraction of these costs.

By insisting that **nothing** be done with the corridor until the public finances an

unfunded, unjustifiable reconstruction effort, Roaring Camp is effectively attempting to obstruct the County, the Cities, and the RTC from using the corridor in ways that serve the public interest.

The remainder of this letter details specific inaccuracies, misrepresentations, and flawed assumptions in Roaring Camp's submission.

The RTC's Obligation Is to the Public, Not to Roaring Camp

Roaring Camp suggests the RTC has a duty to maintain the Santa Cruz Branch Line (SCBL) for its benefit. This is incorrect.

As owner of the corridor, the RTC's obligations are:

1. **To manage the corridor for public benefit**, including transportation, recreation, safety, and environmental stewardship; and
2. **To enter into agreements** only when they serve the community and protect public resources.

No statute, federal rule, or agreement requires the RTC to subsidize freight or excursion rail operations.

The ACL Does Not Require RTC to Fund Freight Rehabilitation

Roaring Camp asserts that the RTC "*has never fulfilled its obligations under the ACL.*" This misstates the agreement.

- The ACL is between the RTC and Progressive Rail (now SPPR), not Roaring Camp.
- The ACL requires rehabilitation **only if funding is available**.
- The county's own § 9111 Report shows freight rehabilitation costs of **\$48.7–\$63.7 million**, with no funding identified.

Freight demand in the county has been minimal for decades, and no operator—not even SPPR—has generated enough business to justify major repairs. A public agency cannot be obligated to spend tens of millions of dollars on a service with no realistic prospect of cost recovery or community benefit.

The Right of First Refusal Is Irrelevant

Roaring Camp cites a 40-year-old waiver of a right of first refusal. This has no bearing on present decisions.

- The waiver does not restrict RTC authority.
- It imposes no obligation to maintain the SCBL for Roaring Camp’s benefit.
- It creates no property interest limiting interim trail development.

In addition, the argument is historically incomplete. At the time the right of first refusal was waived, Roaring Camp did not have the many millions necessary to acquire the line, nor did it have the financial capacity to maintain it. This underscores why the waiver is irrelevant today: Roaring Camp lacked the means to exercise the right then, and it lacks the standing to invoke it now.

Freight Service Has Not Failed Because of RTC

Roaring Camp claims it is “*disingenuous*” for the RTC to note the lack of freight service. The argument is inverted.

Freight service has not failed due to corridor condition. It has failed because:

- In practice, the STB looks to **actual, ongoing freight traffic and demonstrated demand** when evaluating whether continued common-carrier service on a line is justified.
- Progressive Rail’s projections never materialized.
- Years of attempted operations generated **no meaningful freight customer base**, even with full access to the line.

The absence of freight service is a matter of fact, not RTC conduct. Whether the RTC ultimately pursues railbanking or another lawful mechanism for an interim trail, the lack of freight is a required part of the regulatory analysis.

Interim Trail Development Does Not Threaten the Felton Line

Roaring Camp claims that railbanking or track removal “*threatens*” its Felton Line. This is legally incorrect.

- The Felton Line is a **separate corridor**, owned by Roaring Camp in fee.
- Its common-carrier status **does not depend** on the SCBL.
- The STB evaluates abandonment **corridor by corridor**.

Operationally, the Felton Line is already disconnected from any functional freight interchange because freight demand in the county does not exist—not because of RTC decisions. The RTC has no obligation to preserve a hypothetical interchange at public expense.

Track Removal Does Not Create “*Insurmountable Obstacles*”

Roaring Camp asserts that removing tracks would permanently impede future rail. This is inaccurate.

- If railbanked, federal law preserves the corridor for future rail reactivation.
- If pursued through another lawful pathway, the corridor remains intact under RTC ownership.

In both cases, the corridor remains available for future rail if demand, funding, and public interest ever justify it.

Measure D Did Not Mandate Rail Retention

Roaring Camp claims the 2022 Measure D vote was an expression of support for keeping the tracks. This is incorrect.

- Measure D concerned General Plan language—not rail removal or retention.
- Voters did not issue instructions to the RTC.
- The RTC must follow federal law, state transportation law, CEQA, and its adopted plans.

The “*Ultimate Rail*” Proposal Is Not Feasible

Roaring Camp proposes building Segments 9–11 in the “*Ultimate Rail*” configuration. This is not realistic.

It conflicts with:

- current funding limitations,
- ZEPRT cost findings,
- corridor engineering constraints, and
- Measure L in Capitola.

The RTC cannot justify spending public funds on a speculative future rail concept without evidence of demand or viability.

Interim Trail Development: Railbanking or Other Legal Paths

Roaring Camp frames interim trail construction as dependent on railbanking. That is incorrect.

The RTC may lawfully pursue an interim trail through:

- **railbanking**, if conditions are met; or
- **other pathways**, including those contemplated in the Keeley–Koenig proposal.

Under any lawful approach:

- the corridor remains intact under RTC ownership;
- no easements revert if federal jurisdiction is preserved; and
- interim trail use does not prevent future rail.

Conclusion

The RTC is under no obligation to finance or maintain private freight operations. Its duty is to the public and to prudent management of a critical county asset.

The Roaring Camp Letter contains multiple inaccuracies regarding the ACL, freight service, the Felton Line, Measure D, and the RTC's legal options. Whether the Commission pursues railbanking or another lawful mechanism, it retains full authority to manage the SCBL for public benefit.

Respectfully submitted,

Will Mayall
Santa Cruz

From: [Doug Oreck](#)
To: [Regional Transportation Commission](#)
Subject: Santa Cruz desperately needs a safe cross-county bike trail
Date: Saturday, November 29, 2025 9:01:30 AM

Santa Cruz desperately needs a safe cross-county bike trail. This means two lanes in each direction. The rail corridor couldn't be more perfectly suited to this purpose.

Thanks,
Doug Oreck


Aptos

Santa Cruz County Regional Transportation Commission (RTC) Meeting Agenda for December 4, 2025 comment on AGENDA ITEM #25: RAILBANKING OVERVIEW:

ITEM 25 – RAILBANKING OVERVIEW

Trail Now respectfully urges the Commission to direct staff to immediately initiate design work for Interim Trail along Segments 8-11, as well as initiate railbanking of the Santa Cruz Branch Rail Line (SCBRL) north of Watsonville. Also, we request that the RTC vote to make railbanking the SCBRL as the official corridor preservation strategy. Railbanking will preserve the right-of-way for potential future rail while enabling interim use for transportation purposes—most notably the Santa Cruz Coastal Trail.

We request that the Commission take the following actions:

1. Adopt Railbanking as the RTC's Official Preservation Strategy

Formally direct staff to prioritize railbanking for the inoperable freight segments of the SCBRL north of Watsonville to preserve the corridor for potential future rail use while allowing for interim transportation uses, including the Coastal Trail.

2. Initiate Railbanking Process with the Surface Transportation Board (STB)

Direct staff and legal counsel to pursue cooperative abandonment with the current common carrier (Progressive Rail) and prepare all documents required by the STB to begin the railbanking process, including environmental consultations, historical documentation, and a Petition for Interim Trail Use. If Progressive Rail attempts to block the repurpose of the railline to a trail, RTC staff shall work to become Common Carrier of the SCBRL to allow for immediate transition to a trail.

3. Advance the Coastal Trail as the Interim Use on the Railbed

Direct RTC staff, the County, and the City of Santa Cruz to redesign Segments 8–11 and all southern segments to place the trail on the rail alignment, rather than adjacent to active tracks, consistent with a railbanked corridor and cost-efficient implementation.

4. Protect Secured Grant Funding

Authorize staff to pursue trail configurations necessary to preserve approximately \$120 million in secured grant funds currently at risk due to the unaffordable cost structure of rail-with-trail designs.

5. Suspend Further ZEPRT-Related Expenditures Until Funding is Fully Identified

Pause further investment in passenger rail planning unless and until sufficient funding for engineering and environmental compliance is secured and a financially and legally viable path forward has been identified.

PRIORITY ACTIONS FOR INTERIM TRAIL IMPLEMENTATION

In addition to proceeding with the Interim Trail for Segments 8–11, Trail Now requests that RTC incorporate the following actions into the implementation plan:

1. Proceed with repurposing the Capitola Trestle for trail use.
2. Proceed with repurposing the Santa Cruz Boardwalk Trestle for trail use.
3. Advance construction of a temporary trail across the Aptos Highway 1 railroad overpasses, with an approved plan to replace the temporary facility with a permanent pedestrian and bicycle overcrossing prior to removal.
4. Initiate removal of rails and ties and construct a preliminary stone-dust, decomposed granite or other base rock material type trail from Watsonville (Lee Road) to Aptos (Segments 13–17) to deliver immediate mobility, recreation, and public safety benefits.
5. Bring the existing Coastal Trail segment adjacent to Palm Street into full ADA compliance to ensure safe, equitable access for all users.

Our community has already endured significant delay in the delivery of the Santa Cruz Coastal Trail. While we support RTC’s recommendation to advance Segments 8–11, we strongly encourage adoption of the enhancements above to accelerate implementation, maximize public return on investment, and restore confidence in RTC’s commitment to delivering a connected trail system.