

**BEFORE THE SURFACE TRANSPORTATION BOARD**

North Coast Railroad Authority -                    )  
 Abandonment Exemption -                        ) AB 1305X  
 in Humboldt, Trinity and Mendocino            )  
 Counties, CA                                            )

**COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT**

Seeker Enterprises LLC respectfully offers the following comments on the Corrected Draft Environmental Assessment, served on May 23, 2022.

We urge that the recommended Conditions be imposed on any decision granting interim trail use.

We are aware that a trail use approval would result in the removal of tracks and ties in the Humboldt Bay region, in support of the County of Humboldt's Humboldt Bay Trail South Project and the City of Eureka's Waterfront Trail Extension Project.

Therefore, we urge that Condition #6 be modified to formally acknowledge the OFA process now in-progress, in which three OFA offerors are seeking to preserve and use the tracks around Humboldt Bay.

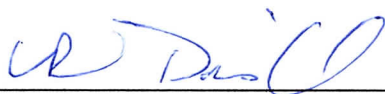
If the Board were somehow to remove this condition before decisions had been made on the four Offers that were received, tracks and ties could be removed whose preservation is sought. The revised condition (added words are underlined) would state:

"NCRA may not file its consummation notice or initiate any salvage activities related to abandonment (including removal of tracks and ties) until it reports the results of these consultations in writing to the Board's Office of Environmental Analysis, the Board's decisions on the Offers of Financial Assistance in this proceeding are legally final, and the Board has removed this condition."

Seeker Enterprises LLC will respond by separate filing to the Draft EA Comments filed today by NCRA/GRTA.

I certify that all parties to this proceeding have been served these Comments.

Dated: June 6, 2022

  
 Francis Driscoll, Co-Owner (AKA Uri Driscoll)