

River Masters, Inc
Dba Raft Masters
2315 E Main St
Canon City CO 81212

Jan 12, 2020

Cynthia Brown
Chief, Section of Administration Surface Transportation Board Office of Proceedings
395 E Street, SW
Washington, DC 20423
Re: **Docket No. FD 36471**

301444

ENTERED
Office of Proceedings
January 13, 2021
Part of
Public Record

Dear Ms. Brown,

It has come to my attention that the Colorado Midland and Pacific Railway recently signed a lease agreement with Union Pacific to use the Tennessee Pass rail line, which runs through Browns Canyon National Monument. Simultaneously, CMP filed for an exemption from regulations that should apply to this lease and ensuing rail operations.

I am writing in opposition to this plan and approval of the Uinta Basin Railway Environmental Impact Statement.

This proposed rail route would transport crude oil through the recently designated and Congressionally approved Brown's Canyon National Monument, as well as over 100 miles of Gold-Medal fishing waters and some of the best and most frequented recreational waters in the United States. In 2019, the most recent year for which data is available, over 190,000 commercial rafting user days were reported on the Arkansas River. The direct spending for this single activity was \$25.8 million with a total economic impact of over \$66 million (Colorado River Outfitters Association report, "Commercial River Use in the State of Colorado 1988-2019, <https://www.croa.org/wp-content/uploads/2020/05/2019-Commercial-Rafting-Use-Report.pdf>).

CMP is proposing to run 10 trains per day (one way) on this Tennessee Pass route, meaning as many as 2500 to 3500 trains per year, yet claiming revenues less than \$5 million per year. Using the low figure that would be revenue of only \$2,000 per trip. I believe they have grossly underestimated the annual revenue expectations in order to avoid additional regulatory considerations.

Furthermore, this rail line has been dormant for around 24 years and, given this period of dormancy, would seem to be a significant change of service that cannot be considered either routine or noncontroversial. Consequently, no exemption from regulations should apply.

The risk of endangering this vital resource for many rural Colorado communities is simply not worth it. The 140 miles of the Arkansas River adjacent to this rail line is the most rafted river in the United States, with participants from every state and numerous foreign guests.

I would strongly encourage the STB to reject this proposal.

Sincerely,

Dennis N. Wied
President, River Masters, Inc

CC: Parties of Record