

**Argyle
Wilderness
Preservation**



EI-30379

November 24, 2020

Mr. Joshua Wayland
Surface Transportation Board
% 9300 Lee Highway
Fairfax, VA 22031
ATTN: Environmental Filing, Docket No. FD 36284

Re: Request for 90-Day Extension of Public Comment Period on Surface Transportation Board's
Uinta Basin Railway Draft Environmental Impact Statement

Dear Mr. Wayland,

I am again writing on behalf of myself, members of the Argyle Wilderness Preservation Alliance, affected landowners, and many other members of the public and concerned citizens to respectfully request a minimum 90-Day extension – to March 14, 2021 – of the public comment period for the Uinta Basin Railway Draft Environmental Impact Statement, STB Finance Docket No. FD 36284 dated October 30, 2020. As you are aware, the Draft EIS is 2,763 pages including all of the appendices. Most of the public, including a majority of us landowners in the area whose lives and properties will be directly affected by the proposed project, work full-time jobs. We have been spending as much time during nights and weekends in reviewing the Draft EIS, but the sheer volume of information makes this an extremely daunting, difficult, and time-consuming process. The current Covid-19 pandemic and holiday season further restrict the time available to devote to reviewing and responding to the Draft EIS.

It has further been difficult to participate in the (3) online Public Meetings that have been held virtually to date, and to provide substantive comments which are relevant to the information in the Draft EIS due to the time involved in reading, understanding, and researching this document.

While the document has been very well-written, S.4.1 clearly indicates that there are several Major Impacts which cannot be completely or effectively mitigated, in addition to many more Minor Impacts summarized in S.4.2. We feel that the public should be afforded sufficient time to review and study these impacts and the associated proposed mitigation measures which cannot be completed within a short 45-day Public Comment Period.

In addition, winter has set in on the proposed project area, thereby significantly impacting the public's ability to review the identified areas of impact on-site due to snow, ice, road closures, which limit our ability to access much of the project area.

Further, the Coalition's failure to secure financing for the development and construction of the project as evidenced by their recently signed Uinta Basin Railway Development Agreement dated September 8, 2020 with Drexel Hamilton Infrastructure Partners Fund II, LLC "DHIP" and Uinta Basin Railway, LLC "UBRY", illustrates that this project is not funded and, as a result, construction would not be impeded or delayed by the STB's granting of our 90-day extension request. Any alleged delays to the Coalition's schedule would not cause any foreseeable delays due to the lack of project financing by DHIP, the private equity firm responsible for commercialization and construction of the proposed railway.

Surely adequate time should be afforded the public and all interested and potentially injured parties to review, research, formulate responses, and respond to the Draft EIS for such a complex project with its accompanying serious impacts. To deny our request would be to perpetuate the abuses of the public for which the Coalition has been culpable ever since this project came to light. The Coalition has intentionally and deliberately withheld relevant project information from the public, and in nearly every meeting has expressed a desire to push the schedule of the project forward, to the disservice and disregard of the public and those who will be negatively impacted by the project. We trust that the Surface Transportation Board values public input and desires to structure the Public Comment Period in such a way to afford all who wish to submit responses ample time to do so in an effective, relevant, and responsible manner. Please seriously consider our request for a 90-Day extension of the Draft EIS Public Comment Period.

Sincerely,



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