

David Navecky

From: Andy Corbus <acorbus@gmail.com>
Sent: Wednesday, August 31, 2016 9:34 AM
To: rutsonv@stb.dot.gov
Cc: David Navecky
Subject: GLBT Process Concern

Victoria Rutson
Director, Office of Environmental Analysis
and Federal Preservation Officer
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August 31, 2016

Dear Ms. Rutson,

I am concerned about the process and procedure around the Great Lakes Basin Transportation Proposal. On July 5, 2016 you made a very specific request for GLBT to provide the alternatives considered at all points along the route. If one is reading this as written, the expectation was for GLBT to provide evidence that due consideration was given to alternatives.

It would appear that GLBT has taken that request as an opportunity to create alternatives, rather than to disclose the alternatives as you asked. This is of great concern, as the application and EIS process is clearly designed to be a mechanism for providing the best possible options to rail transportation projects. It is evident that the expected applicant has not completed a bona fide engineering and transportation based analysis of routes at this time. This is little more than a corridor of convenience for the developer, drawn on a map to avoid sensitive areas, and counties known to have robust Governmental challenges to projects like these.

Unfortunately, you have been asked to complete an EIS for this corridor of convenience, rather than a fully engineered alternative plan customary to the process. This is evidenced by the July 5, 2016 request, which to date has gone unheeded, even after a phone meeting on August 5, 2016 to discuss the request. A review of the minutes, revealed little more than they were quiet vague. Was an extension request for the August 29, 2016 deadline mentioned at this time? Is a full transcript of this meeting available?

Even of greater concern, is why has an application not been filed and proper fees paid? The STB has spent considerable resources on what is proving to be a very preliminary idea. The public has expressed concerns over the current proposed route, yet does not have the enjoyment of an actual narrative, alternatives, or intended use in some segments, such as the railport. If public comment is truly to be considered, then the public should be entitled to this information prior to making comment. I as a concerned citizen, and you, as the agency tasked with measuring impact, are looking for the same thing. Details. Yet neither of us seems to be having success gaining more information, nearing a year after the alleged applicant began communication with the STB.

I am deeply concerned that the public has made comment to an idea, not a formal proposal or application. We have thus far been denied details that may or may not yet exist. Yet the commenting period has closed. While

it is my understanding that once a draft EIS is prepared, the public will once again have a chance to comment. The commenting period will be in response to a prepared EIS, forcing the public to question the work of the STB, rather than on steering the work of the STB EIS by providing key information on each segment of the application. For this reason, as a taxpayer, I must ask you to cease and desist all work on the GLBT proposal, until the time an application is received, and fees are paid. At that time a new draft study should begin to be prepared and public commenting period opened in earnest.

I am not suggesting, that the work you have done up to know has been improper, but premature, as it is clearly evident that foundational details are still being created by the developer. Far too much property, livelihoods, communities and natural areas are at stake for the process to continue on the promise of application from GLBT.

Please deny the request for extension, and cease and desist all EIS activities, until an application is received and published, and fees paid. At that point the public should have the opportunity to make comment based on the actual application, and have those comments included in a draft EIS. The other alternative is for the STB to take the “no action” alternative to the existing proposal, as there seems to be very little information supporting the need at this time.

Sincerely,

Andrew Corbus

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