

Wayland, Joshua

From: Raphael Cordray <crphaelc@gmail.com>
Sent: Saturday, July 27, 2019 7:39 PM
To: Wayland, Joshua; utahtarsandsresistance
Subject: Request for extension of the public comment period for the Uinta Basin Railroad (UBRY)
Attachments: Request for extension of the public comment period for the Uinta Basin Railroad.pdf

Cathryn Raphael Cordray
 4187 so Neptune dr
 Millcreek Utah 84124
crphaelc@gmail.com

July 26, 2019

Joshua Wayland, Surface Transportation Board,
 c/o 9300 Lee Highway, Fairfax, VA 22031,
 Attention:
 Environmental filing,
 Docket No. FD 36284

Subject: Request for extension of the public comment period for the Uinta Basin Railroad (UBRY)
 Environmental filing Docket No. FD 36284

Dear Mr Waylund

I am writing to you personally and on behalf of Utah Tar Sands Resistance (UTSR) and behalf our members to request an extension of the public comment period for the scoping of this project. It is vital that our members, local residents, community and environmental organizations, business leaders, and other agencies have an adequate opportunity to review and provide comments on the scoping for the proposed routes, and to make their voices heard. It is essential that those who will be most directly impacted have a sufficient opportunity to provide their comments on the routes and their impacts.

Outreach by the Seven County Infrastructure Coalition (SCIC) to the potentially impacted communities within the project range has thus far been grossly inadequate. The SCIC held one "public meeting" on the proposed UBRY with a scant 24 hour notice (absolute minimum allowed under Utah law). The public meeting was obscured within the regular monthly board meeting and the location of the meeting was then changed just 24 hours before the meeting was held.

A copy of the scant Public notice web posting is here:

<https://www.utah.gov/pmn/sitemap/notice/491653.html>

The SCIC is not meeting the required criteria for using CIB funds which specifies "all applicants have a vigorous public participation effort "There has been no concerted effort by the SCIC or the CIB to inform the public of the existence or nature of this massive project proposal that would impact the entire state for generations. Many in the affected area have grave concerns about how quickly this process was announced and advanced with meetings scheduled and comments required in such a short period of time. Considering the scope, complexity and impact of this proposal, this short scoping comment window of 45 days does not give enough time for the affected people to access and review the relevant information and make informed scoping comments. The SCIC has provided insufficient information for the public to meaningfully comment on the Uinta Basin Rail Project.

The SCIC has not posted meeting audio recordings and other public documents as required by law and they have been slow to respond, delayed or ignored GRAMA requests for UBRY related records. Currently UTSR is seeking more information from the SCIC regarding the UBRY through public document requests. The SCIC has ignored our requests and acted in violation of the Utah Government Records Access and Management Act (GRAMA) (Utah Code 63G-2-101 through 63G-2-901).

After 10 days we can appeal and we are pursuing this appeal for documents to inform our scoping comments. We are pursuing the following documents from the SCIC:

The documents as described in SCIC UBRY Remaining Funds Request Addendum v2 060519 application to the CIB, to wit:

1. Private Energy Producer 2017 Uinta Basin Railroad Study – geometrics, capital cost, and financial feasibility data
2. Coalition option 2015 Information Gathering and Planning Study – review of Craig route
3. UDOT 2014 Uintah Basin Railroad Study – environmental and mapping data, capital cost, and financial feasibility data.

We will need additional time to acquire these documents through an appeal and time to analyse and write scoping comments in light of and about this information. Therefore we respectfully request that you extend the public comment scoping period by 60 days up to and including September 3 2019.

Thank you for your consideration,
Raphael Cordray, personally and for,
Utah Tar Sands Resistance

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