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Received: 12/1/2020 5:36:52 PM**Commenter:** Kevin Rogers**Organization:****State:** Utah**Agency:** STB**Initiative:** Uinta Basin Railway EIS**Attachments:** No Attachments**Submission Text**

I've owned land in Argyle Canyon since 2008 and I personally built a cabin that sits within earshot of the trains that will pass through any of the proposed lines. Now I am sure that you have hours if not days of emails and comments that detail the visual, environmental, and quality of life impacts, along with the associated value-losses that this railway will impose upon the Argyle Canyon area, so I'll focus my comments on perhaps a larger issue. There's a principle in real-estate taxes called "Highest and Best Use" that basically taxes a parcel based on what it's reasonable potential might be rather than what it is. I am an owner of a multi-million dollar business in Salt Lake City. We employ 55 employees and we make internal decisions that involve the principle of Highest and Best Use every day, only in business we refer to it as "opportunity cost analysis", and rather than a government taxing us based on their view of potential, we essentially hold ourselves accountable for the ramifications of the decisions we make by enduring 100% of the consequences when we fail to identify, and act on the better option. Where I want to focus my comments is on this element. I have no doubt that the SCIC and Drexel Hamilton Infrastructure Partners have done the math and have concluded that this project will be profitable for their organizations, or in the case of the SCIC, the industries they represent. DHIP would not be where they are today if they weren't good at determining the potential costs and benefits. Where the SCIC and DCIP differ from the business that my partners and I run, is that their model largely relies on either the government (in the form of the STB or the EPA) to act on behalf of shareholders that do not have a voice within their companies, voices that may raise potential concerns that add to their cost column. These shareholders are landowners and the general public, and we bear a portion of the cost without any benefit. Our company relies on manufacturing partners across the country. We thoroughly vet these relationships as they represent a symbiotic bond in the business landscape. After personally forming dozens of these relationships, many that have lasted for decades, I can comfortably say that I know what it looks like when a company has your best interests in mind, and when they are looking to take an advantage. I have attended 8 of the SCIC meetings in-person. I can unequivocally say that their posture is not that of one seeking a symbiotic bond with the communities they hope to operate in. They have gone to great lengths (holding meetings at incredibly inconvenient times, changing meeting venues and times at the last minute, limiting comments to 30 seconds, or none at all, etc.) to make sure the community voice has been stifled. When viewed through the eyes of a businessman, this tells me one thing. Their business model doesn't require a lasting relationship with the public to make money. This alone constitutes reason for denial. Once access is granted, and the project is complete, the community voice won't be heard over the sound of oil train traffic. DHIP and the SCIC are left to reap the benefits and the costs are shouldered by the hundreds of landowners, wildlife, and outdoor enthusiasts who's lives will be forever impacted. We have to ask ourselves, with the known challenges of refining Uinta Basin crude, and with oil projected to play a diminishing role in the US energy portfolio, is the cost of this project too great to ignore? We can't simply look at the numbers provided by the SCIC and DHIP determine if the "highest and best use" of this land is a future rail line. They have done their analysis, and I can guarantee that they'll come out on top. The landowners and the general public meanwhile, will pay a toll that can never be paid back. What small voice they have left, will fall on the SCIC's deaf ears. Please deny them access and be a strong voice for those who stand to lose the most.