



January 12, 2021

Michael McKee
Executive Director
Seven County Infrastructure Coalition
5995 S. Redwood Road
Salt Lake City, Utah 84123

RE: Uinta Basin Railway Project EIS
Contract No. UBRy-002
Amendment No. 2 Cost Estimate

Dear Mr. McKee:

ICF Jones & Stokes, Inc. (ICF) respectfully submits this cost estimate to the Seven County Infrastructure Coalition (Coalition) to amend Contract No. UBRy-002 between ICF and the Coalition for the Uinta Basin Railway Project Environmental Impact Statement (EIS). This letter supersedes ICF's November 6, 2020 letter requesting an amendment. We have modified our request due to the extension of the public comment period for the Draft EIS from December 14, 2020 to January 28, 2021, which necessitates a longer contract period of performance than previously proposed.

Amendment No. 2 would authorize additional funding for ICF to provide third-party contractor services to the Surface Transportation Board (Board) Office of Environmental Analysis (OEA) in completing the Final EIS and would extend the contract period of performance by eight (8) months through August 31, 2021.

ICF is currently working under the scope and budget authorized by the Coalition in contract Amendment 1 that was executed in August 2019. Additionally, via email the Coalition authorized ICF to continue working past the current authorized period of performance of December 31, 2020 using existing funds while this subject amendment is being considered. Prior to and since the August 2019 amendment was executed, we have supported OEA in preparing the Draft EIS for public release and on related agency consultation efforts. While we have worked diligently to control our costs and efficiently prepare high quality work products, the level of effort thus far has been greater than anticipated resulting in using previously approved funds at a faster rate than anticipated. Below are some of the key drivers that resulted in greater levels of effort:

- Increased meeting frequency and greater coordination between ICF and OEA, the Coalition, cooperating agencies, other agencies of jurisdiction, and Section 106 consulting parties than anticipated.
- Comments and input from cooperating agencies required additional effort to address, including comments on analysis methods in advance of receiving final alternatives from the Coalition.

- Changes in the alternatives for analysis and changes to project footprints required ICF to re-run analyses and update the project description and related details.
- Revisions to field survey reports and GIS required ICF to re-run analyses and revise documents.
- Developing assumptions and resolving data gaps for the project description to facilitate robust technical analysis.
- A larger number of scoping meetings, more technical staff supporting scoping meetings, and a broader geography for those scoping meetings than anticipated.
- Increased effort to develop assumptions and analysis around an oil field and terminal development scenario.
- Expanded role in supporting National Historic Preservation Act consultation, including identification and documentation of resources, and developing the Section 106 Programmatic Agreement.
- Extended public comment period for the Draft EIS.
- Extended period of performance by eight (8) months.

To keep the Coalition and OEA informed, we have indicated in our monthly progress reports when we have performed these or other efforts that have required more work than anticipated. As a result of the additional effort and resulting costs, additional funding will be required to support OEA through the remainder of the EIS process.

We prepared this cost estimate in coordination with OEA based upon our remaining authorized budget and future anticipated work through completion of the Final EIS. We have worked with OEA to confirm our approaches to supporting them and associated additional costs of doing so during this next stage of the EIS process. Table 1 displays our cost estimate by major task. ICF shall invoice costs monthly, on a time and materials basis.

Table 1. Amendment 2 Cost Estimate

Task	Cost
Project Management	\$73,727.40
Public Comment Analysis and Website Management	\$62,718.74
Comment Response and Final EIS Preparation	\$332,747.55
Agency and Tribal Consultation	\$119,311.08
Total	\$588,504.77

Our cost estimate reflects our current understanding of the scope of work and level of effort to prepare the Final EIS. However, there are still considerable unknowns that can impact the budget. Most notably, the number and complexity of the public comments submitted on the Draft EIS will directly affect ICF’s level of effort to respond to comments and prepare the Final EIS. We have prepared this cost estimate based on the following assumptions:

Project Management

- The period of performance is through August 31, 2021.
- This cost estimate does not include support to OEA or the Board for the Board’s issuance of its final decision, including support as a result of any litigation.

- Includes:
 - Ongoing coordination with OEA and with team for task management.
 - Schedule maintenance and budget management.
 - Monthly coordination meetings with the Coalition and OEA to discuss budget and schedule. Running financial reports and projections to prepare for the meetings.

Public Comment Analysis and Website Management

- The specific number and complexity of comments on the Draft EIS is uncertain as well as OEA's direction on how to respond to these comments.
- Public comments will be parsed and categorized using the CommentWorks system.
- Most comments will be submitted directly into the CommentWorks system to avoid additional handling of any comment files.
- Comments will include transcripts from six online public meetings.
- Includes updating and maintaining project website with announcements, public comments, files, and other information.

Comment Response and Final EIS Preparation

- The efforts to prepare and structure of the Final EIS are not specified at this time due to the uncertainty about the number and complexity of comments on the Draft EIS. Efforts to prepare the Final EIS will account for significant input already received from OEA and the cooperating agencies while preparing the Draft EIS.
- Public comment period will close in January 2021.
- Focused effort on parsing and responding to comments will start in January 2021.
- Development and application of standard responses will be used where possible and applicable.
- OEA will review administrative draft Final EIS files.
- One round of public notification for Final EIS will be needed.

Agency and Tribal Consultation

- Programmatic Agreement will be finalized and circulated to Consulting Parties for signature in February 2021.
- Final Biological Assessment will be prepared to address public and agency comments, which are anticipated to be minor, in February 2021.
- Includes ongoing support to OEA and ongoing consulting party and cooperating agency meetings.
- Cooperating agencies will review administrative draft Final EIS files.

Upon agreement, ICF will perform these services as an amendment to our existing contract with the Coalition dated March 26, 2019 (Contract No. UBR-002). Given the current impacts, both known and unknown, of the COVID-19 pandemic, for which there will likely be effects into the foreseeable future; personnel assignments, travel restrictions and other government mandates, may constrain our ability to conduct our services and provide deliverables as envisioned in this proposal. ICF reserves all rights to revise our delivery schedule and price due to such impacts from COVID-19 and will provide written notice of such proposed changes as needed.

Should you have any questions regarding this proposal, please contact Debra Rogers at (202) 714-1508 or debra.rogers@icf.com.

Sincerely,

A handwritten signature in blue ink that reads "Trina L. Fisher". The signature is written in a cursive style with a large initial 'T'.

Trina L. Fisher
Contracts Administrator