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Agency: STB

Initiative: Uinta Basin Railway EIS

Attachments: No Attachments

Submission Text

Joshua Wayland, PhD Surface Transportation Board c/o ICF 9300 Lee Highway Fairfax, VA 22031 Attention: Environmental filing, Docket No. FD 36284 Dear Mr. Wayland Economics: The Uinta Basin shale oil is marginal in terms of economic return on energy and pollution created to get it to markets outside of Utah. BTU Analytics has noted the high cost of directional drilling, the difficulties in transporting the waxy crude in pipelines- requiring tank trucks or rail tank cars. The crude must be discounted \$10/barrel and transported to far away refineries. Present output can be used by Salt Lake area refineries. When oil prices drop the return on the investment disappears, leaving infrastructure idled. The US taxpayer is always left to clean up the mess, after bankruptcies and depleted resources. At the outset, \$28 million Community Impact Board funding is being used to fund this EIS, which would promote—more impacts. This is at a time when communities are facing economic hardship and a pandemic. This funding is the essence of economic injustice. Climate Change - Our climate is already at a critical point, We must not allow an expansion of fossil fuel development on this scale. Increasing Uinta Basin oil production –up to four times the current amount-- will contribute heavily to greenhouse gas emissions and climate change. This is especially pronounced with the inefficient production and transportation of the heavy, waxy crude to distant refineries- much of it for export. Wildlife - Over 10,000 acres of big game habitat will be affected by the railroad. The proposed route of the Uinta Basin Railway traverses roadless areas, steep canyons, and rugged terrain. Some of this area has been designated as crucial big game habitat by the U.S. Forest Service. The route also impacts the 1600 acres of Greater sage grouse habitat, and areas inhabited by the endangered Barnaby ridge-cress. Increasing Uinta Basin Oil Production - The EIS does not analyze the increase in production of fossil fuels as a direct result of the railway operations. The railway will increase oil production in the Uinta Basin by up to four times the current level. The EIS does not consider the full impact that the new exploration, drilling, production and eventual combustion of fossil fuels will have on the environment, wildlife, and nearby communities. Air Quality - Uinta Basin air pollution exceeds federal standards because of existing oil and gas development in the region. - -Increasing oil and gas development will make it worse. The Downline Segment Analysis, Traffic and Predicted Accidents per Year tables do not consider the full routing to reach destinations along the Gulf Coast. It also greatly understates the probable number and consequences of accidents. The rail routes follow waterways, including the Colorado River, increasing the likely impact of accidents. The Eagle and Arkansas rivers, for the so-called "shortcut" are not mentioned in the EIS . This line has 3% grades, a 10400ft pass, and serious rockfall and avalanche hazards. The impacts of increased production of shale oil and bitumen oil are not considered regarding their effects on ground and surface water- in the long and short term. Water can be contaminated with solvents used to remove oil from bitumen to pollute the Green, White, and Colorado rivers. Fracking of oil sands will require vast amounts of water. The effects of the fracking and water withdrawals are not considered. The Uinta Basin Railway doesn't make economic sense. But more importantly its environmental cost makes it a unjustifiable. Conclusion: The proposal has poor net economic outcomes. The environmental risks are greatly understated. The purpose and need not are not demonstrated. No-Action Alternative must be chosen. Thank you for the opportunity to comment on this important issue. Jay Gingrich Buena Vista, CO