

There is only one clear option. The no-action alternative must be the out come for the proposed Uinta Basin Railway to prevent devastation to critical plant habitat for at least 2 species of great concern not specifically reported inventoried in this shallowly executed process that fail to meet the essentials under NEPA.

It only requires a look at how the proponents describe the right-of-way for their proposed rail road. There's no clear centerline for the route which would have to be the center of their proposed 1000 foot wide right-of-way. With such a nebulously wide route with now defined centerline from witch to measure, it is impossible to know exactly what impact could or will be.

The ill-defined right-of-way as it is proposed could actually result in ruinous land clearing and slope impacts across an area well beyond the noted 10,000 by opponents. In reality, allowing for a 1000 wide right-of-way could impact 10x the worst case described. Further, the extremely arbitrary nature of a 1000 wide right-of-way could actually result in impacting populations of sensitive plant species and natural ephemeral springs and seeps vital for serving the micro habitats supporting rare plants and wildlife.

The proposed railway would do irreparable harm to our region's air, water, land, wildlife and vulnerable plant species and must not be built.

This draft environmental impact statement totally fails at what it's supposed to do: assess the harm this oil railway could have on the environment, wildlife, vulnerable plant species, and nearby communities.

The new oil production resulting from the railway expansion — potentially four times the current amount — will contribute irreversibly to increased greenhouse gas emissions. Our climate is already at a tipping point, so we need to sharply reduce fossil fuel use instead of expanding it. The railway's emissions will also further pollute the air in the Uinta Basin in Utah, which already exceeds federal standards because of existing oil and gas development.

Because no mitigation strategy is offered to offset the toxic environmental effects of increased oil production stimulated by the proposed project, the draft EIS fails under NEPA requirements.

Traversing roadless areas, steep canyons and rugged terrain, the railway will degrade more than 10,000 acres of habitat for migratory wildlife and will harm important habitat needed by the rare greater sage grouse and the endangered Barnaby ridge-cross. There is no specific inventory reported in this Draft EIS, representing a fatal deficiency for the accuracy of the document.

The complete lack of documenting cumulative local and regional impacts represents a deficiency that unless fully addressed must result in the no-action alternative.

The preferred project route would run almost the entire length of Utah's Indian Canyon

Creek, crossing and degrading more than 400 streams and important wetlands along the Price River — harming the semi-arid state's precious perennial waterways.

In Colorado, the project could mean reopening a rail line through scenic Tennessee Pass, despoiling scenic lands and wildlife habitat to get oil trains to the Gulf Coast. Mile-long oil trains could rip through sensitive areas like Browns Canyon, a rugged 22,000-acre national monument designated in 2015 to protect one of the wildest stretches of the Arkansas River.

Finally the Uinta Basin Railway would harm people who live and recreate in both states. Landowners in Utah's Argyle Canyon and nearby off-grid canyon communities fear the disruptive noise, traffic delays, and clouds of diesel smoke oil trains will bring along the proposed routes — not to mention the significant potential for accidents, derailments, spills and even sparks that could ignite disastrous wildfires. And people in Colorado won't escape the air pollution drifting downwind from Uinta Basin, even as the railway rips through a national monument and other scenic areas supporting outdoorsy tourism many locals rely on for their livelihood.

This Draft Environmental Impact statement is one of the most shallow, incomplete, and factually deficient I have ever encountered. That alone should disqualify the project on its face. It's as though the principals pushing this economically flawed rail project assume some right to proceed in spite of its gross deficiencies.

This project is an unacceptable threat to the health, safety and well-being of wildlife, vulnerable plant species, humans and the planet.

The careless approach of this DEIS fails even the most basic requirements of environmental and cultural analysis. This fact alone disqualifies the proposed project. It's as though the proponents haven't even walked a mile of either proposed route.

On its face, the proposed, arbitrarily wide right-of-way threatens the natural environment, specific critically important habitat and water resources vital to wildlife and microclimate plant habitats over a wide area. Further, the proposed expansive, ill-defined right-of-way exceeds any reasonable interpretation of qualifying as reasonable under NEPA.

The only viable option is the no-action alternative.

By Marv Poulson