

Chairman Patrick Fuchs and Esteemed Members of the Surface Transportation Board

395 E Street, SW

Washington, DC 20423-0001

Re: Urgent Opposition to the Lease of Union Pacific Rail to Central Oregon & Pacific Railroad
(Docket No. FD 36818)

Dear Chairman Fuchs and Members of the Surface Transportation Board,

I am writing to urge you, in the strongest possible terms, to reject the proposed lease agreement between Union Pacific (UP) and Central Oregon & Pacific Railroad (CORP). This is not just an issue of economics or logistics, this is a matter of life and death. If you approve this lease, you will be handing control of highly hazardous materials, including anhydrous ammonia, to a company with a proven track record of failure, mismanagement, and reckless disregard for public safety.

This is a corporation that has already abandoned critical infrastructure, crippled local economies, and demonstrated utter incompetence in rail operations. Now, they want to take over a yard that handles some of the most dangerous chemicals transported by rail. The consequences of their inevitable failure will be catastrophic.

CORP: A History of Negligence, Abandonment, and Dangerous Operations

CORP has a well-documented history of cutting corners, mismanaging operations, and outright abandoning critical rail lines when they become inconvenient or unprofitable.

- Coos Bay Line Disaster - In 2007, CORP abruptly shut down the Coos Bay rail line, stranding local industries and destroying regional commerce. They claimed it was due to "maintenance costs," but in reality, they let the infrastructure rot to the point of total failure. The federal government and taxpayers had to step in and rescue the line after CORP's reckless abandonment.

- Derailment and Safety Issues - CORP has a track record of poor track maintenance, lax safety protocols, and derailments. Their neglected lines have led to dangerous conditions, putting both workers and surrounding communities at risk.

- Incompetent Emergency Response - Unlike major rail carriers like Union Pacific, which have well-trained hazardous materials teams, CORP has no substantial emergency response

infrastructure. If a chemical spill or explosion occurs, they will be completely unprepared, leaving local first responders to clean up their mess.

If CORP cannot even manage basic rail service without failure and abandonment, how can they be trusted with the transportation of highly volatile chemicals?

Anhydrous Ammonia: A Ticking Time Bomb in CORP's Hands

Anhydrous ammonia is one of the deadliest industrial chemicals in existence. It is used in agriculture and refrigeration, but when improperly handled, it becomes an invisible killer. If released, it forms a dense, low-lying toxic cloud that asphyxiates anything in its path.

What Happens If Anhydrous Ammonia Leaks, Spills, or Explodes?

With CORP's negligence and lack of safety oversight, a catastrophe is not a possibility, it is inevitable.

- Mass Casualties Within Minutes

- A rupture in an anhydrous ammonia tank would release a toxic gas cloud that spreads rapidly, suffocating everything in its path.

- Inhalation causes immediate lung burns, internal bleeding, and respiratory failure. Victims collapse within minutes.

- A single ruptured tank can kill hundreds within a mile radius, and the Eugene rail yard is dangerously close to homes, businesses, and schools.

- Explosion Risk: A Fireball That Could Level Eugene

- If anhydrous ammonia is exposed to heat or ignition, it can explode with the force of a bomb.

- A derailment or mishandling of pressurized ammonia tanks under CORP's management could trigger a chain reaction, causing secondary fires, explosions, and toxic plumes that could poison entire communities.

- The death toll would be catastrophic, with thousands exposed to lethal chemicals and fires raging for days.

- Environmental Collapse and Water Contamination

- A spill would poison the Willamette River, killing fish and contaminating drinking water for years.

- The toxic plume would render entire sections of Eugene uninhabitable.

- Cleanup costs could run into the billions, but CORP, a financially weak short-line operator, would simply walk away, leaving taxpayers to foot the bill.

This is not a hypothetical scenario, this has already happened in the past:

- Minot, North Dakota (2002) - A train derailment released anhydrous ammonia, killing one person, injuring 333, and forcing thousands to evacuate. The gas cloud burned people's lungs and permanently injured dozens.
- Kingman, Arizona (1973) - A ruptured anhydrous ammonia tanker exploded, killing 11 firefighters and emergency workers, proving that even trained professionals are vulnerable to its deadly effects.

Now, imagine what happens when CORP, a company with a track record of negligence, incompetence, and abandonment, is left in charge of transporting this chemical through densely populated Eugene.

CORP's Undertrained, Understaffed, and Unregulated Operations Are a Disaster Waiting to Happen

CORP does not have the personnel, expertise, or infrastructure to safely manage hazardous materials.

- Undertrained Workers - Unlike Union Pacific, which employs highly trained, unionized crews, CORP cuts costs by hiring minimally trained workers with little experience handling hazardous cargo.
- Lack of Track Maintenance - CORP's history of delayed repairs, ignored maintenance, and neglected track conditions increases the risk of derailments.
- No Emergency Response Capability - If a disaster occurs, CORP does not have a dedicated hazardous materials response team leaving local emergency services completely overwhelmed.
- Minimal Regulatory Oversight - CORP operates as a Class III railroad, meaning they face fewer federal regulations and inspections than major carriers like Union Pacific. This low level of scrutiny makes them an even bigger risk.

If This Lease Is Approved, The STB Will Be Complicit in the Next Major Rail Disaster

This is not just a corporate transaction. This is a direct threat to the lives of everyone living near the Eugene rail yard. If CORP takes control, the question is not if a disaster will happen but when.

Reject this lease agreement. Protect lives. Do the right thing.

Sincerely,

Danny Soliz