

From: [Richard Spotts](#)
To: [Uinta Basin Rail Environment](#)
Subject: My scoping comments for preparation of the Uinta Basin Railway Draft Environmental Impact Statement
Date: Wednesday, July 17, 2019 7:23:16 PM

July 17, 2019

Joshua Wayland
Surface Transportation Board
c/o 9300 Lee Highway
Fairfax, VA 22031
Attention: Environmental filing, **Docket No. FD 36284**
(Sent via email to: uinta.eis@icf.com)

**RE: My scoping comments for preparation of the Uinta Basin
Railway Draft Environmental Impact Statement**

Dear Mr. Wayland:

Please accept, carefully consider, and include in the appropriate NEPA project file/administrative record my following scoping comments on the above-referenced matter.

I am a long-time Utah resident and taxpayer who is deeply concerned about this proposed Uinta Basin Railway. I believe that this proposal is a ridiculous boondoggle that is very likely to waste public funds, harm public resources, and move Utah in the wrong direction vis-à-vis increasing fossil fuel development at a time of worsening climate change. I also believe that this proposal is a highly questionable use of public funds that are supposed to be used to help mitigate damage to local communities. Instead, it appears that Utah officials are pandering to wealthy corporate fossil fuel interests which do not need or deserve such public subsidies. Since many Utah officials have financial or other conflicts of interest, which would likely preclude their official involvement in other states, I wonder what conflicts may exist in terms of jobs, contracts, stock ownership, or other items of value in this particular situation.

Besides the obligatory proposed action railway alignments and no action alternatives, I recommend that one or more other feasible alternatives be fully analyzed in the DEIS. These alternatives would spend the public funds to actually benefit local communities and mitigate past harmful impacts. For example, an alternative would be to install solar panels for free or at low cost on residential and commercial structure roofs in the region. These solar panels would use a free and renewable source of energy: the sun. Installing these solar panels could also provide valuable

jobs and relevant training opportunities for local residents. Another alternative would be to spend these public funds on a combination of measures to reduce the serious particulate and other forms of air pollution that already plague this region. In short, it would be much better to invest in clean, renewable energy and/or improvements in public health rather than on a railway to benefit polluting corporate interests.

I understand that BLM will be a cooperating agency on this NEPA process because the proposed railway alternatives may require amendments to existing BLM plans and consideration of specific right-of-way applications over BLM lands. As such, I urge BLM to be faithful to its twin multiple use and sustained yield FLPMA mandates by requiring a broad purpose and need statement along with an analysis of the types of alternatives that I previously described. BLM should not accept a DEIS that is too narrow and only analyzes the proponent's limited railway alternatives. Doing so would be patently myopic and demonstrate arbitrary, pre-decisional bias in favor of narrow fossil fuel development.

In terms of the specific railway only alternatives, I strongly support, applaud, and hereby wish to incorporate by reference the excellent Salt Lake Tribune op-ed at this web site:

<https://www.sltrib.com/opinion/commentary/2018/12/23/commentary-cib-should/>

As you know, the proposed Uinta Basin Railway oil train would increase production of oil from the Uinta Basin by between 225,000 and 350,000 barrels of oil per day. In a region that currently only produces around 80,000 barrels per day, this would represent a quadrupling of oil extraction. This significant increase would have dire consequences for air quality, public lands, water, and climate change.

In addition to the oil extraction, the construction and operation of the railway itself would also have significant adverse impacts. Three possible routes have been identified, but the 80-mile Indian Canyon route has been identified as the preferred option. It is reported that at least \$27.9 million in public funds have already been spent or dedicated to move the project forward.

Air pollution in the Uinta Basin has already reached dangerous levels due to oil and gas development. By allowing for quadrupling oil extraction in the region, the railway would greatly exacerbate this air pollution. This would result in more asthma attacks and other harmful conditions that can lead to premature death.

The extraction and combustion of four times as much oil from the Uinta Basin would threaten our ability to avoid the most disastrous effects of climate change by staying under 1.5°C warming.

Fossil fuel development requires large amounts of water. At a time when water security for the region is more tenuous than ever, increased oil development unleashed by the Uinta Basin Railway would threaten the region's water supply. Indeed, the current climate change projections indicate an increased risk for more prolonged and severe droughts.

The new drilling pads, pipelines, roads, and associated facilities needed to create a fourfold increase in oil development in the Uinta Basin would result in significant adverse impacts to the region's scenic landscapes, including on BLM and other public lands. This new development, along with the railway, would greatly increase the problems of wildlife habitat destruction and fragmentation, and the disruption of essential wildlife movements. As such, relevant landscape ecology and conservation biology information should be analyzed in the DEIS, including a comparison of likely effects among the alternatives.

New oil train traffic would create localized air pollution and noise, inconvenient waiting times at road crossings, and risk of toxic or explosive derailments in the communities through which the trains travel.

If the oil plays out or the oil market collapses before the railway is paid off, would the public be stuck with any debt, railway abandonment, and/or clean up costs? Would the benefitting oil companies be required to post any bonds to cover any such future costs? Would the consultants preparing the DEIS have any future conflicts of interest, such as the ability to contract for any subsequent railway design, engineering, or construction work?

I hope that my scoping comments are helpful. Please put me on the list to receive all future notifications on this matter.

Thank you very much for your consideration.

Sincerely,

Richard Spotts

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cc: Interested parties