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Sent: Monday, June 24, 2019 4:40 PM
To: Wayland, Joshua
Subject: Uinta Basin Railway - Scoping Comments: Seven County Infrastructure Coalition; Docket No. FD 36284

June 24, 2019
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Uinta Basin Railway – Scoping Comments
Seven County Infrastructure Coalition
Docket No. FD 36284

Dear Mr. Wayland

A few years ago, several eastern Utah counties banded together to spend funds, without taxpayer oversight, to build costly projects not directly related to the infrastructure of Uintah County. Now the recent Six-County Infrastructure Coalition has made a proposal for a Uintah Basin Railroad (UBRR) to Craig, Colorado, Kyune, Utah. Hope springs eternal in the fatheads that spend our money like drunken sailors. They have already wasted 6.5 million dollars to study several of the routes, and the results of that study is that it is not financially feasible. Therefore, in scoping the potential routes you should:

1.) **Geology & Soils:** All of the proposed rail routes would traverse very unstable soils and subsoils, not unlike the highway from Rangely to Loma and they would encounter similar problems with landslides, expansive soils and washouts. All of the proposed routes would need to overcome extensive and continual, as well as expensive drainage issues that require culverts and bridges. The proposed lines would require extensive engineering and maintenance. Washouts of the line would occur on most storms requiring culvert cleaning/replacement, bridge and rail repair during our common storm water runoff.

The geological formations the route would require expensive tunnels would require internal support and lining. It appears that the proposed routes have barely recognized the role of elevation. The proposed routes, in reality will face grades over 2%, and most railroads prefer not to have to attack increased grades over 1.5%. The tough grades requiring additional power, another economic factor to consider.

2.) **Climate:** Snow would be a very big issue in winter, likely shutting the line down and having to have/wait for a snow blower to get through drifts. The line would require dead head snow plowing in winter, where drifts would likely require two locos, spreaders and plows. (see Kyle RR plowing snow in Eastern CO below). Watch the whole video. Eventually the Kyle had to bring in 5 additional locos, excavators and dozers to get the original plow out and open the line. <https://www.youtube.com/watch?v=tF2ZPRmocs4>
Summer rain storms, including what is locally known as the “monsoons” will create a number of issues from washouts, clogged culverts, rockfall to tracks covered in mud. These issues have financial, as well as operational implications.

3.) **Economics:** It is very unlikely that established roads would build an expensive line to the Uintah Basin, even with government subsidies. Class I or II railroads may operate the line with government subsidies, but once those subsidies expire, they will leave and Uintah County and taxpayers WILL have a railroad to operate.

The approximate cost of building a new railroad line on good soils and geology is over two- million-dollars/mile. * A lot of machinery is involved in building a new line, along with operators for the machinery, and the logistics of delivering the material to the work site. A hidden cost is the environmental impact studies and revision to BLM, U.S. Forest Service (Ashley N.F.) of management plans.

Building the rail line will require an engineering, maintenance division, a large building for locomotive and car repair, carpenter shop, and other infrastructure to operate the line. For Central Train Control add another \$200,000 per mile. These are the reasons why you don't see many new rail lines being built anywhere, and the railroads only build new tracks when and where they are absolutely needed.

A contractor may operate the line, until government subsidies run out) but their locomotives must have the capability to meet Union Pacific (UP) standards of the new train control requirements, pay to use any UP rail, plows and spreaders and maintenance railroad cars. A rental fee will be required to be paid for owner railroad cars while they are on the line. Even if operational contracted the county will need vehicles and crews to inspect the line.

The county will likely pay, or pay to a contractor everything from operation to management, liability insurance, and much more. Employees will require retirement, unemployment, workman's compensation and all of the other benefits that railroad employees require.

I don't know where someone got the pipe-dream that there would be seven (7) trains incoming/outgoing each day! That is a total pipe dream, unless steep grades limit the number of loaded cars in a train! That estimate must be checked for accuracy (as well as reality!). Most railroads are not interested in a local pulling a few dozen loaded cars and empties in and a few dozen loaded cars and empties out. Most Class A Railroads are interested in unit trains of 100+ cars of a similar commodity. The scoping should look at the effect that had on the granaries in the mid-west (along with BN & CP). It meant that small granaries had to reload a couple dozen cars and use their loco and track to pull them to a larger granary. That meant higher operating costs for the small granaries and additional operating costs for the use UP, BN & CP rails, and trains from outside rails would be low on the scheduling. There would be an increased the cost of loading, unloading and cleaning cars for the UBRR. There are few railroads that make it work. The Nebraska, Kansas & Colorado Railway is one, and the Kyle RR in eastern CO and western KA also makes it work, but each of those railroads have over 550 miles of track. On most short lines in the mid-west farmers found it cheaper to load their trucks and haul it further to the large granaries themselves.

In the October 2014 Vernal Express "Profiles in Energy" Publication page 25), Uintah County Commissioner Mike McKee said: "People talk of boom or Bust. We are beyond this because of our energy resources. Our economy has grown to the point where we are stable." Well, right now we are certainly NOT in a boom. What will the economy of a UBRR be during the period of busts?

"... despite the companies' promises, there was never any true commitment to the places they were emptying of fuels or minerals." Bernard DeVoto asked a simple question: can you show me a single time when a company didn't leave after taking all it wanted or needed? Here in five words is his summary of the extractive industries: "All mining exhausts the deposit." What will happen to the UBRR then?

4.) Safety: Accidents and oil spills are common in the Uintah Basin. Any contractor, or operator of a railroad such as the UBRR must prove that they have the financial and operational capability to contain and totally clean up and recondition any environmental damage. The rivers are home to four endangered fish, and a spill could devastate all of the recovery gains.

Fire, either from a railroad accident, or wildfire that affects operation are other safety considerations. After storms, the importance of someone to check the condition of the rails should be required. With the new use of deep injection of used drilling fluids, there is an opportunity for human-caused earthquakes as the Glen Canyon fm. Is not that far below.

5.) Land Use & Recreation: It appears that the proposed routes infringe on potential Wilderness status.

6.) Biological: The train line, especially when combined with a highway will fractionalize wildlife habitat. This is of concern in regard to migrating deer elk, pronghorn and sage grouse. The use of gas and oil contributes to climate change, and the effect of increased oil must be quantified.

Hope springs eternal in the minds of speculators. There are over a \$100 million dollars' (1990 estimate) worth of clean up, yet unfunded and yet undone to fix damage from the 1920's and 1980's oil shale binges. These companies also have tens of thousands of acres of oil shale in fee title - let them prove their technology on their own resources before we lease public lands for experimental, potentially damaging activity. In Uintah and Duchesne County Counties there are over 350 uncapped, unreclaimed oil and gas wells from over a decade ago spewing methane and other contaminants into the air and on the land and water. I say let the companies involved and interested in oil, gas, shale and such replace their divots, clean up their past messes, then we can talk about developing more and giving them more bouquets with million-dollar bills attached to them.

Growth for the sake of growth is the ideology of the cancer cell.

Herm Hoops
Jensen, Utah

* Approximate costs/mile:

Construction engineering, (prelim & final)	\$300,000
2 No.10 Degree Switches	\$ 50,000
No.10 Switch Timbers	\$ 12,400
132/136 lb. rail (245 tons)	\$171,500
7"x9' Ties on 21" Centers (3,017 ties)	\$166,600
Ballast (6,000 tons rock)	\$162,000