

September 3, 2019

William Marsing Livestock, Inc.
4330 East 8900 South
Price, UT 84501

Joshua Wayland
Surface Transportation Board
9300 Lee Highway
Fairfax, VA 22031
Attention: Environmental filing, Docket No. FD 36284.

Dear Mr. Wayland,

Below are my comments on the proposed Uinta Basin Railway. I've not tried to combine them or categorize them. If they are repetitious, please forgive me.

I'll start first with a bit of background on myself, as that will better frame my perspective. My family and I run a livestock operation in eastern Utah, and about a third of the summer grazing that we use is located on the Ashley National Forest at the head of Indian Canyon. My family has grazed that particular allotment for over a century. We also hold the grazing lease on a few SITLA (School and Institutional Trust Land Administration) parcels that are on or near the proposed route as it makes its way down the Roan Cliffs. The following comments pertain mostly to the Indian Canyon route as it makes its way through the upper part of Indian Canyon, through the tunnel, and down the Roan Cliffs.

I am very concerned that the Indian Canyon route would decimate my grazing allotment on the forest, and would severely reduce the number of cattle I could graze.

I am very concerned about the very real likelihood that some of the animals that I graze in this area will be struck by passing trains. I would expect that every effort is taken to prevent this from happening, and that I would be fairly compensated for any losses. I would also expect that I would be given ironclad assurances that I would not be held in any way liable for any resulting incident, from equipment damage to derailments.

I am very concerned with the impacts that the proposed railway will have on the grazing conditions in my allotment. The area of the canyon we graze is very narrow, with the really useful areas being a long strip along the bottom, that is typically between 300 and 500 feet wide. The proposed railway will be on a minimum 100 foot right of way, meaning it will likely directly impair about a quarter of my use of this land. I expect that due to the difficult terrain in the area that many deep cuts and high fills will be needed to maintain the required grade, meaning that the amount of land directly impacted may indeed be much higher.

I am very concerned about the effect the railway will have on the movement of cattle. The proposed alignment makes several meanders across the canyon. This would have a great impact on the ability of cattle, not to mention wildlife, to move freely in the canyon. Fencing the right of way and providing for underpass facilities would mitigate this in my view only slightly. If fencing is done, cattleguards will need to be installed on access points, which are a reliable way to prevent open gates, but also are a maintenance and safety concern. I also am concerned about the amount of tunnels that seem to be drawn in my allotment. There will need to be some way of keeping cattle from entering them.

I am very concerned about the problems that fencing the right of way would cause. I foresee a highly increased fire danger that would be caused by eliminating grazing on the lands adjacent to the railway. Overgrowth of grasses and weeds would be very susceptible to sparks

produced. I am also concerned about the maintenance of the fences. The maintenance would need to be the responsibility of the rail company, but I fear that needed repairs would not be done in a timely manner. Fencing the right of way would also have the effect of isolating sections of grazing land from nearby water sources, basically eliminating its usefulness.

I am very concerned about the impact that this project will have on water availability, reliability and quality in the canyon. I worry that the various tunnels proposed will adversely impact the numerous springs that I rely on for cattle drinking water. I foresee the tunnels having a dewatering effect on springs. Every coal mine I know of has had some kind of detrimental effect on the springs in the area above them. I also have concerns about the quality of the water that would flow out of the tunnels. I have the same concerns about cuts and fills. The deeper the cut and the higher the fill, the higher the probability of an adverse impact is. I am concerned that the numerous creek crossings will impair both the flow and quality of the natural flow of the creek in the area. I worry that dust blowing off the proposed coal trains will contaminate the area in general and the waterway in particular. I shudder to think what the aftermath of a spill of any sort would be.

I am very concerned about what the outcome of a flood event would be. Flood events are quite commonplace in this canyon, with a flood event big enough to shut down the highway happening almost yearly. On wet years, several such occurrences have happened. I worry about such an event impacting the railway, maybe even resulting in a derailment. I also worry about how the railway would be designed to handle the debris flow. I can envision the grade being constructed in such a way that it would concentrate and channel such debris flows away from where they are now flowing, resulting in adverse impacts on soil and water conditions. Debris flows could eventually impact more of my grazing area than the actual construction of the railway.

I am very concerned with the inevitable introduction of exotic, invasive, noxious weeds. Every construction endeavor I've ever witnessed resulted in just such an explosion of weeds, and in my experience, no methods of controlling nuisance weeds is successful long term.

I am very concerned about the impacts that the area will suffer from the presence of trains. Due to the steepness of the grade and the sharpness of the corners, I would anticipate that the speed of passing trains could be quite slow. If the train is of any length at all, the time that it is in the canyon could be considerable. I worry about the impacts that having equipment moving slowly through the canyon for extended periods of time would have long term, from hampering movement of cattle and livestock, to the effects that the noise and vibrations have.

I am very concerned about the impacts that a spill would have. I can envision that a spill of liquid material would have a very large footprint on the landscape. As stated above, I shudder to think what such an event would mean for the overall environmental quality of the area. I can also envision that a spill of dry materials such as coal or of equipment such as pipe or machinery could also result in similarly large footprint on the landscape. Not only the direct spill must be considered, but the area that would be impacted by the effort of cleaning up the spill.

I am concerned about a possible increase of people using the area around the railway. I can see this project attracting outdoor enthusiasts of all types. This project will undoubtedly include maintenance access roads, and those will attract off-road vehicle users, either sightseeing or hunting. Trestles will attract daredevils of all types, from climbers to base jumpers. There will need to be steps taken to prevent mischief, including locked gates and increased law enforcement patrols.

I am concerned about the economic viability of the proposed project. The notice document states that the expected number of trains on the railway would be about seven per

day. My casual observation of the railways in Eastern Utah is that there is currently much less train traffic than that in the area. I would speculate that the estimated usage of this proposed railway is optimistically high. It seems to me that a very rigorous review of the economic viability of this project is in order. I cannot imagine that the astonishing up front costs of construction could ever be offset by any benefit that the project could provide. This math only gets worse as construction prices overrun and the expected benefit turns out to have been overstated.

I am concerned about the long term need of such a project. I can think of a number of places that I've seen rail grades that have been abandoned. It would sadden me greatly to have this project built and then need to be subsequently decommissioned because the expected need quickly deteriorated, or worse yet, never develops in the first place.

I am concerned about the impact that the stated increase in train traffic might have on Eastern Utah in general. If this project does indeed result in an average of seven trains per day, that will mean an extra seven trains on the existing railways in the area. This would be a very large percentage increase. The effect that this increased rail traffic will have on things like road crossings and neighborhoods will need to be somehow quantified. The additional traffic may also result in some congestion of the local railways and logistics may need to be modified accordingly.

I am concerned about the aesthetic impacts this will have to the area. The giant s-curves that the grade makes as it drops off of the Roan Cliffs traverses a forested slope that features some unrivaled fall colors. The abrupt elevation changes that the alignment experiences in dropping off the Roan Cliffs will require gigantic fills or trestles. I hate to think what that means for the landscape.

Lastly, I am concerned that the preliminary planning that has been done to this point. I am very familiar with some of the area that the proposed Indian Canyon route will take, and am somewhat puzzled by some of the engineering choices that have been made. The side tunnels in Indian canyon and the resulting sharp curves could easily be eliminated by entering the longer tunnel further to the north. The northern end of the long tunnel seems to be at about the 8100 foot elevation mark, the southern end is at about 8300 feet. A slightly longer tunnel that daylight on both sides at a lower elevation might make a lot more sense.

A better solution to the transportation issues in the Uinta Basin might be to put the money that would be spent developing this railway toward upgrading Highway 40 to interstate freeway standards. This would benefit all the people of the area by allowing much better access to the more populous areas of the state, increase tourism, and improve the safety of those that travel the road.

I am not opposed to having a railway serving the Uinta Basin, but I cannot imagine that the way to do this is the Indian Canyon route. Of the three proposed routes, the Craig route seems to me to be the one that would benefit more people and industry. Thank you for this opportunity to have these comments heard.

Sincerely,

A handwritten signature in black ink, appearing to read "William Butcher". The signature is fluid and cursive, with a long horizontal stroke at the end.

William Butcher
Operations Manager