

William H. King
1564 Wasatch Drive
Salt Lake City, Utah
84108-2446
801-582-0432

Dear Sirs,

I am a businessman, economist, historian and researcher. I was reviewing the Uinta Basin Railway DEIS and one section, that of Wildfire Ecology, 3.4-13-15 seems particularly egregious. This section suggests that there will not be a problem with wildfires along any of the three alternatives because railways are not associated with fires. Nothing could be further from the truth. I am making comments on this section on behalf of myself and leaving the rest of the document for others to scrutinize.

Table 3.4-5 purports to represent "Wildfires in Utah (1980-2016)," the table only lists 9,022 fires and 682,899 acres burned in the 36 years. The Catastrophic Wildfire Reduction Strategy committee of the Utah State government in 2019 stated that: "Utah averages over 1300 wildland fires and burns almost a quarter-million acres annually." Table 3.4-5 only represents 19.3% of the fires and 7.9% of the acres that actually burned in the 36 year period. So what's wrong with this table? The data in the table was collected from federal land management agencies and only lists fires with known causes. The only significant cause that is readily apparent from the table is lightning, which accounts for almost 74% of the fires and is the easiest cause to determine. Railroads in the table are said to only be involved in 22 fires and 413 acres in 36 years. That is a total misrepresentation of the role railroads play. I have personally seen evidence of more than 22 railroad fires involving more than 413 acres in Weber, Davis and Morgan counties in the 36 year period. A good example of the absurdity of the table is illustrated in the legal case of US vs Union Pacific Railroad Co., reported on Law 360, (a LexisNexis company) on January 28, 2010. The Union Pacific destroyed 1,968 acres of US government land in a Utah fire in 2004. This was clearly not reported by the federal land managers table. Another good example of a railroad fire in Utah was reported by the Ogden Standard Examiner on July 4, 2016: "Sparks from a Union Pacific train caused a brush fire Monday July 4, that has burned 30 plus acres in Weber Canyon and shut down part of Interstate 84."

Utah fires associated with railroads are by no means isolated examples, across the West, the media is replete with cases that involve railways and fires. Take for example: Wildfire Today, Feb. 25, 2009 reported that a Union Pacific train started nine fires along a 5 mile stretch of track in Arvada, Colorado. The Deseret News reported on July 23, 2008 that Union Pacific had agreed to pay \$102 million for a fire that was started by a welding crew in August of 2000 that was repairing the tracks. The fire burned 52,000 acres in the Plumas and Lassen National

Forest. Jeff Humphrey reporting on August 13, 2007 on KXLY.com stated that BNSF railway may have caused more than 40 fires along its tracks in Northeast Washington in the last decade.

DEIS Table 3.4-6 Wildfire Hazard Potential in the study areas suggest that the risk of fires in the study areas is very low or low or moderate for the time period from 1980 to 2016. However in 2020 things have radically changed, the US Drought Monitor categorized most of Utah and the study area as being in an extreme or exceptional drought. Data from the Western Regional Climate Center for Duchesne City states that it only received 4.2 inches of precipitation for the year in 2020, a 100 year low and comparable to the amount received in many deserts. One media analyst in 2020 suggested that you could drop a match almost anywhere in Utah and start a fire. Many climatologists suggest that the West is headed into a mega drought, an exceptionally hot and dry period, that could last more than 20 years, see for example Brian Handwerk, *Smithsonian Magazine*, April 16, 2020. Under these circumstances, the fire hazard potential of the study areas should be elevated a couple of notches and taken seriously.

All three of the DEIS alternatives go through some pristine and beautiful areas. The consequences of a large fire would be devastating to wildlife, birds, rare animals and plants and old growth trees (bristlecones) as well as those humans who already use the land. The DEIS section on Wild Fire Ecology should be greatly expanded to include resources and methods that could be deployed to prevent wildfires in each of the alternatives as well as to fight wildfires should they occur along the railway right of way.