

January 26th, 2021

EI-31143

Joshua Wayland
Surface Transportation Board
9300 Lee Highway
Fairfax, VA 22031
Joshua.Wayland@stb.gov
Attention: Environmental filing, Docket No. FD 36284
Subject: STB Should Deny Coalition Petition as Currently Formulated

Uinta Basin Railway EIS No Action Comment #2: The alternative most consistent with public convenience and necessity is “No Action” due to unresolved environmental and economic issues with Coalition proposal

Dear Mr. Wayland:

I am writing to you to highlight unresolved problems with the proposed UIB rail line that will exacerbate tremendous environmental issues for the public in Utah and Colorado. The SCIC proposal should be denied so that it can be reformulated with a truly sustainable value proposition to serve the public interest in a sustainable and economic manner.

I respectfully request that the STB deny the Coalition proposal and require them to improve their proposal to address the massive environmental and economic problems created by their proposal.

1) EIS Misinforms About Environmental Impact :The EIS misinforms about the environmental impact of a massive increase in crude oil production in the non-attainment air quality Uinta Basin. There is over-reliance on a single prior “paper” EIS for one development. The EIS does not actually examine the actual track record of oil & gas production in the Uinta Basin. If production of just 90,000 BPD has already made the Uinta Basin air quality unhealthy, what will the next 350,000 BPD do? The paper study in the EIS ignores the reality breathing clean air is both a public convenience and a necessity.

2) EIS Does Not Take Into Account Utah State Regulatory Failures: SCIC fails to take into account the actual state of oil & gas regulation in the state of Utah. The Utah Department of Oil, Gas and Mining (DOGM) went decades without enforcing or fining serial polluters unlike peer regulators in the adjacent states of Wyoming, Colorado and New Mexico. The EIS is fatally flawed in assuming that the proposed production of 450,000 BPD will magically be managed better than the current 90,000 BPD which has already destroyed air quality in the Uinta Basin. Any projections about future air quality are wrong if the State of Utah behaves in the future as it has in the past and not enforced even basic regulations with the result that local air quality has been damaged.

3) EIS Does Not Address How Massive Production Increase Will be Managed: EIS does not address what happens when a wide variety of oil & gas producers, from large, responsible majors with strong engineering and production track records to shady, fly by night small producers who skirt even basic safety and environmental regulations, rush to maximize their own profits at the expense of public convenience or necessity. EIS should include assessments of what happens if half or more of future production fails to meet even current safety and environmental standards.

4) EIS Fails to Address Developers Plans for LPG and LNG Facilities: The SCIC partner, Roosevelt Economic Development Council has discussed future LPG and LNG development which will create further safety and environmental issues not discussed in the EIS. How exactly will these non-crude fossil fuels be extracted and processed? What further environmental and green house gas emissions will come from the production that the SCIC is obviously already contemplating? Where in the Cumulative Impact are these developments discussed if the sponsors are already planning on it?

5) EIS Fails to Disclose to Uinta Basin Public the Impending Health Issues the UIB will Cause: EIS fails to any discussion of or include projections of increased respiratory disease and asthma caused by massive expansion of oil & gas production in the Basin. These projections could easily be made if the SCIC engaged local non-oil & gas

industry partners who already have the data available (like Utah Physicians for a Healthy Environment - UPHE). It is untrue to claim that the UIB is a “public convenience and necessity” while refusing to disclose or even estimate the direct health impacts on the residents of the State of Utah and Western Colorado.

6) Polluting Your Neighbor’s Breathing air is Not a Public Convenience or Necessity. No matter which way the winds blow, uncontrolled crude oil production in the Uinta Basin will impact non-attainment air quality regions along the Wasatch Front or in Northern Colorado endangering the health of twenty times as many people as in Duchesne and Uintah Counties. Is it fair and equitable to hurt the health of millions for the sake of a special interest group? The EIS again fails to engage independent experts such as UPHE to accurately estimate the negative long term health impacts on the population of adjacent regions. Relying on an internal paper model versus having an open public debate with outside experts is another reason why this EIS cannot claim to be a “public convenience and necessity”.

7) EIS Fails to Address the Obvious Collateral Damage of Production Increase Created by UIB: EIS ignores the ancillary impacts of a massive increase in hazardous waste generation and disposal, large increases in necessary (for safety) and unnecessary (sloppy operations) flaring, increased methane loss, remote controller gas venting and contamination of limited drinking water supplies all of which are directly negative to public convenience and not a necessity by any stretch of the imagination. Currently available technology not addressed by the EIS could mitigate some of these issues if the project was actually designed correctly which it is not.

8) EIS neglects to accurately describe the actual environmental impact of the railway. The “effective” right of way is much greater than what is proposed in the documents as rail traffic, pollution, maintenance impacts and wildfires will destroy a wider swathe than the basic assumptions made in the proposal especially in steep and rocky terrain that is hard to manage. The EIS also speaks very little as to the impact on the High Uinta Wilderness area so treasured by Utah

residents and subject to a massive increase in pollution caused by this project. EIS also does not address fundamental native plant issues brought forward by the Utah Native Plant Society, the acknowledged expert on Utah wild plants. Bottom line, this special interest project is not a public convenience or a necessity.

I respectfully request that the STB exercise wise stewardship in denying this permit as currently formulated. There is a far superior alternative economic development strategy that the SCIC has failed to develop, discuss or present which would offer far more benefits to the Uinta Basin and Western Colorado than their current proposal.

Asking the SCIC to go back to the drawing board and develop that superior economic strategy which allows for higher crude oil production with appropriate safety & environmental safeguards and produces much better health outcomes is the only responsible thing to do.

Thank you for your consideration.

Craig Wallentine
Summit County, UT