



UINTAH COUNTY

STATE OF UTAH

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January 27, 2021

**Joshua Wayland, PhD
Surface Transportation Board
c/o ICF
9300 Lee Highway
Fairfax, VA 22031
Attention: Environmental filing, Docket No. FD 36284**

Re: Docket No. FD 36284, Uinta Basin Railway Draft Environment Impact Statement

To whom it may concern,

On behalf of Uintah County we are writing in support of the Uinta Basin Railway project. The Uinta Basin relies heavily on natural resource extraction and agricultural production, and because our community is in a remote location it has become increasingly difficult to transport such goods in a safe and timely manner. Due to this issue, Uintah County has stressed the importance of transportation planning. The Uintah County General Plan (2017) specifically states that a “standard-gauge freight-only railway into the Uinta Basin” that would connect our community “to the national railway network” should be considered as a possible regional infrastructure project (pg. 29, Capital Facilities and Infrastructure). Each of the proposed alternatives would place a terminus in the Leland Bench area, as well as several miles of railroad before exiting Uintah County’s borders. Due to the small footprint within Uintah County, we do not believe that the railroad would have a significant physical/environmental impact to the county. However, the socioeconomic impact the railroad could have on our communities would be significant. For this reason we are writing in support of each of the alternatives that pass through our county.

Based on information provided in the Draft Environmental Impact Statement, we would like to share the following comments with the Surface Transportation Board:

Section 3.1, Vehicle Safety and Delay

Each of the proposed routes would enter Uintah County: the Wells Draw Alignment; the Whitmore Park Alignment, which is the OEA’s preferred alternative; and the Indian Canyon Alignment. None of these alternatives would have a significant impact on vehicle transportation or delays in Uintah County. Each

of these alternatives would fall within a fairly remote part of the county. There are no major roads in this area. However, the Wells Draw Alignment may cross a newly reconstructed road in T3S R1E Sec. 31, and T3S R1W Sec. 35. This road primarily provides oilfield access on the south side of the Duchesne River. In the case of significant delays, traffic may be rerouted to 8250 S, which provides access in the same area.

Both proposed routes may also cross several unmaintained Class D County Roads, including Chevron Pipeline Road and Sand Pass Road. These roads are lightly trafficked, and any crossings would likely not pose any risk or significant delay to the existing traffic patterns.

While the exact starting point for the railway is unclear, it appears to be located on or near Leland Bench Road. This road provides an important transportation route within the Leland bench oilfield. However, it may be possible to reroute this road to extend eastward, around the terminus of the railway so as to avoid any disturbances on this relatively busy oilfield road.

In regards to traffic throughout Uintah County, it is expected that a railway would significantly decrease the amount of heavy truck transportation on our local roads. This, in turn, would improve safety, especially during the winter months when traffic speeds are often decreased due to snow and ice. Transporting hazardous materials on the railway would also protect drivers from spills that could pose a threat to human life on our local roads and highways.

Section 3.2, Rail Operations Safety

Section 3.2.3.1 Impacts Common to All Action Alternatives

On the rare occasion that an accident caused a crude oil spill, it is unlikely that any of the alternatives in Uintah County would affect any major waterways. The Whitmore Park and Indian Canyon Alternatives are not located near any streams or bodies of water in Uintah County. The Wells Draw Alternative is located near the Myton Townsite Canal, and appears to cross it in two spots, but this is not a major waterway.

Section 3.7, Air Quality and Greenhouse Gases

Because the terminus point for each alternative is located at Leland Bench—which is a centrally located point within the oilfield— trucks will travel fewer miles when transporting goods. Fewer miles traveled will translate into reduced emissions originating from Uintah County.

Section 3.13, Socioeconomics

Each alternative would provide an equal amount of socioeconomic stimulus to Uintah County. The construction of the terminal station and the associated railway would provide jobs and opportunities for local contractors, vendors, and hotels. In addition to the construction phase, the operation phase of the railway would increase opportunities for local residents to ship manufactured products, agricultural goods, and crude oil on the national railway system. Our small economy would have the opportunity to connect with larger economies by means of a safe, reliable railway system as opposed to dangerous

highways through mountain passes. Uintah County is a place of abundant resources and potential, but our remote location impedes citizens' ability to grow beyond our borders. Socioeconomically, Uintah County would greatly benefit from the stimulus that the railway would provide. Additionally, increased financial flexibility would allow our county to invest in mitigating any negative environmental impacts that the railroad may bring. Finally, Uintah County's communities are well accustomed to accommodating rapid increases in development and growth. Our economy has swollen and shrunk for decades, and our infrastructure has the ability to absorb and service rapid expansion.

Terminus at Leland Bench

The terminus in Uintah County is located in the Heavy Industrial zone. This particular area is especially conducive for uses that have a heavy impact on the land. Allowed uses include construction camps, landfills, heavy manufacturing, oil refineries, power plants, produced water disposal facilities, and salvage yards, etc. Because of the remote location, separation from water sources, distance from residential areas, and lack of vegetation, this area provides an excellent setting for highly impactful uses such as the railroad terminus.

Final Comments

We appreciate and thank you for this opportunity to comment on the Draft EIS for the Uinta Basin Railway project. We are of the opinion that the environmental impacts to Uintah County would be minimal, and it is our hope that a local railway connection would decrease the amount of long-distance trucking required by our local industries, and in turn decrease the overall emissions produced by our transportation services and increase the safety on our local highways. None of the alternatives would negatively impact any residences, major roadways, waterways, cultural resources, visual resources, or the general welfare of Uintah County's communities. Uintah County only stands to benefit from the Uinta Basin Railway project, and it is our hope that one of the proposed alignments may be approved after going through the NEPA process.

Sincerely,

Brad Horrocks, Chairman
William Stringer
Bart Haslem

Uintah County Commissioners