



Joshua Wayland, Ph.D
Surface Transportation Board (STB) c/o ICF
9300 Lee Highway
Fairfax, VA 22031
Attention: Environmental filing, Docket No. FD 36284

February 6, 2021

Dear Mr. Wayland,

Executive Committee

Ken Kraus, Chair
Paul Weiss, Vice Chair
Kathy Wilson, Secretary
Jan Brock, Treasurer

Members of the Capitol Hill Action Group (CHAG) oppose construction of the proposed Uinta Basin Railway (UBR) and submit this public comment for the Draft Environmental Impact Statement (DEIS) process. The UBR would cause significant local, regional, and global environmental harm while expending monies the Seven County Infrastructure Coalition (SCIC) should more responsibly invest in projects helping rural communities transition beyond their current economic dependence on the declining fossil fuels industry. We support the DEIS' "No Action" alternative and request that the SCIC be denied any and all permits to proceed with the UBR.

The Capitol Hill Action Group (CHAG) is a group of neighbors in Salt Lake City united by the goals of a healthy environment, social justice and responsive government.

The STB's Office of Environmental Analysis (OEA) has already determined that construction and operation of the Uinta Basin Railway "would result in significant environmental impacts." OEA admits that there would be "major impacts" on surface waters and wetlands, threatened and endangered species, public and private lands, and on people residing nearby. This alone should stop the UBR.

What we find most stunning, however, is the DEIS failure to take into consideration the local, regional, and global impacts of an infrastructure project whose intent is to facilitate a four-fold expansion of crude oil extraction and export. The DEIS pretends that the only air quality and greenhouse gas problems associated with UBR are short-term (during construction) and limited (locomotives hauling the oil).

At current levels of oil and gas extraction, the Uinta Basin experiences periods of ozone pollution that violate EPA standards. UBR-driven drilling and mining increases would exacerbate the ozone noncompliance problem.

The DEIS is perhaps most remiss in its avoidance of how the UBR would literally fuel global warming by dramatically increasing the Uinta Basin's hydrocarbon contribution to climate change. More oil pumped means more oil burned and more greenhouse gases put into the atmosphere. CHAG members understand the science of climate change and how fossil fuel usage represents a growing existential threat to our families and the nation. UBR represents a step in the wrong direction. That the DEIS fails to address the full range of UBR impacts is unconscionable.

We are also concerned that the SCIC would take tens of millions of Mineral Lease Act dollars meant to mitigate negative impacts of oil, gas, and coal extraction and instead use the funds to further subsidize the industry responsible for those impacts by building the UBR. The DEIS should have considered the societal costs of rural development opportunities squandered as the SCIC misused funds to finance UBR.

We urge the STB to recognize that the UBR is a wasteful, dangerous, and unnecessary project worthy of rejection. Please deny it the means to continue.

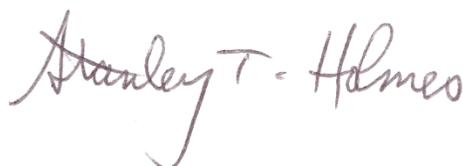
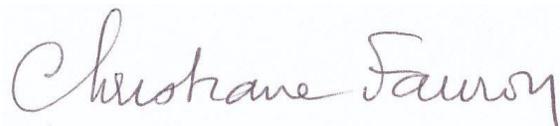
Sincerely,



Ken Kraus,

CHAG Executive Committee Chair

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