
September 20, 2019

VIA EMAIL

Ms. Victoria Rutson
Surface Transportation Board
Office of Environmental Analysis
395 E Street, SW
Washington, DC 20423-0001

Re: Finance Docket No. 36284 – Seven County Infrastructure Coalition – Uinta Basin
Railway Project Proposal – Whitmore Park Route

Dear Ms. Rutson,

I am writing regarding the route alternatives under consideration of the Office of Environmental Analysis (OEA) for the Uinta Basin Railway Project. As you are aware, the Seven County Infrastructure Coalition (the Coalition), the project applicant, previously identified three potential routes: the Indian Canyon route, the Wells Draw route, and the Craig route.¹ Based on information obtained through the scoping process, including data collection, technical evaluations, and public outreach, the Coalition now proposes the Whitmore Park route, for further consideration by the OEA during the NEPA review process. The Whitmore Park route generally overlaps with the proposed Indian Canyon route, but deviates slightly in certain areas in order to resolve issues identified through scoping.²

The purpose of the proposed Uinta Basin Railway is to provide common-carrier rail service connecting the Uinta Basin in northeastern Utah to the interstate common-carrier rail network using a route that would allow the Coalition to attract shippers with a cost-effective rail alternative to trucking. The Whitmore Park route would satisfy the project's purpose and need with fewer impacts to property owners and potentially reduced environmental impacts. Specifically, the Whitmore Park route would avoid impacts to a total of twenty-nine property owners. In support of the Coalition's request to consider the Whitmore Park route, we describe the alignment of the route and summarize its potential benefits in more detail below.³

A portion of the Whitmore Park route would be located slightly south of the proposed Indian Canyon route. This southward shift would be beneficial for multiple reasons. First, it would avoid impacts to the largest property along the route—a nearly 15,000-acre ranch with approximately 200-300 head of cattle, which is also utilized for hunting in late summer and fall. Second, the shift would bring the proposed railway in line with the existing right-of-way for the

¹ See Seven County Infrastructure Coalition's First Supplemental Response to the STB Office of Environmental Analysis April 12, 2019 Request for Information # 1, Attachment 1: Uinta Basin Railway Evaluation of Potential Route Alternatives (May 31, 2019).

² Under separate cover, the Coalition has provided preliminary kmz files depicting the proposed Whitmore Park route. These kmz files are preliminary in nature and subject to modification.

³ Preliminary maps depicting the proposed Whitmore Park route are included as Attachment 1.

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Emma Park Road. As a result, the Whitmore Park route would have fewer environmental impacts because it would be located within an already disturbed corridor.

In addition, the Whitmore Park route would be located slightly east of the proposed Indian Canyon route in the Whitmore Park area in Carbon County, Utah. As a result of this shift, the Whitmore Park route would avoid impacts to nineteen property owners and a slide area. Avoiding the slide area will improve the stability of the railroad and could also reduce annual maintenance costs. Moreover, the Whitmore Park route would result in some construction benefits in this area including an improved crossing over Highway 191. For comparison, while the Indian Canyon route would require a tunnel structure with up to 50 feet of fill, the Whitmore Park route would cross Highway 191 in a location allowing a rail bridge of only about 25 feet, which is more in line with standard bridge height.

Furthermore, the Whitmore Park route would reduce impacts to property owners in an area known as the “Mini-Ranches” in Duchesne, Utah. In fact, the Coalition’s engineering team has determined that this shift in alignment could potentially avoid all existing homes by at least 1,000 feet, thereby eliminating impacts to property owners in the Mini-Ranches area. Overall, compared to the Indian Canyon route, the Whitmore Park route would directly impact approximately ten fewer property owners in the Mini-Ranches area. It would also have fewer indirect impacts on property owners, such as noise and visibility impacts. Finally, the Whitmore Park route would require fewer at-grade road crossings in the Mini-Ranches area. Thus, this alignment would result in improved safety and reduced traffic impacts.

* * *

Based on information developed during the public scoping process and information collected by the Coalition, the Coalition has determined that the Whitmore Park route may be preferable, in several respects, to the proposed Indian Canyon route, while still satisfying the project’s purpose and need. Accordingly, subject to additional information gained through further studies and analysis, the Coalition has identified the Whitmore Park route as the Coalition’s preferred alternative for the project. Among other things, the Whitmore Park route would minimize direct and indirect impacts to private property owners, reduce environmental impacts, and potentially result in construction benefits. Thus, the Coalition requests OEA to consider the Whitmore Park route for further analysis in its NEPA review process. Please do not hesitate to contact me if you have any questions.

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Sincerely,

A handwritten signature in cursive script that reads "Kathryn Kusske Floyd".

Kathryn Kusske Floyd

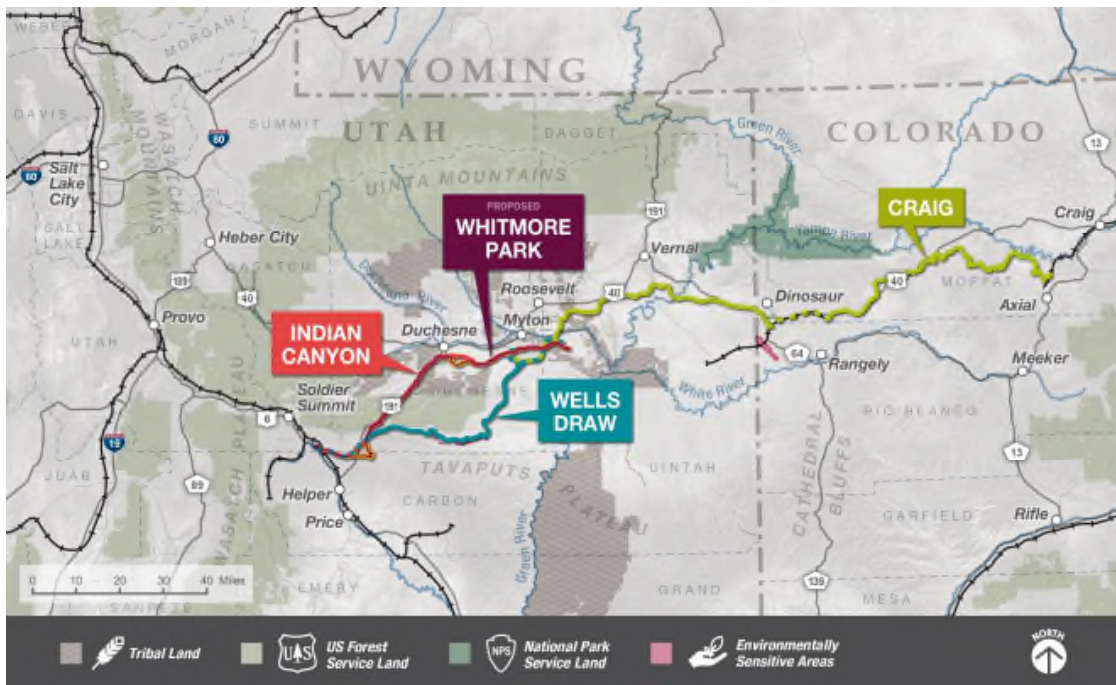
cc: Danielle Gosselin
Joshua Wayland
Mike McKee
Eric Johnson

Attachment: Proposed Preliminary Route Maps – Whitmore Park

Attachment 1:

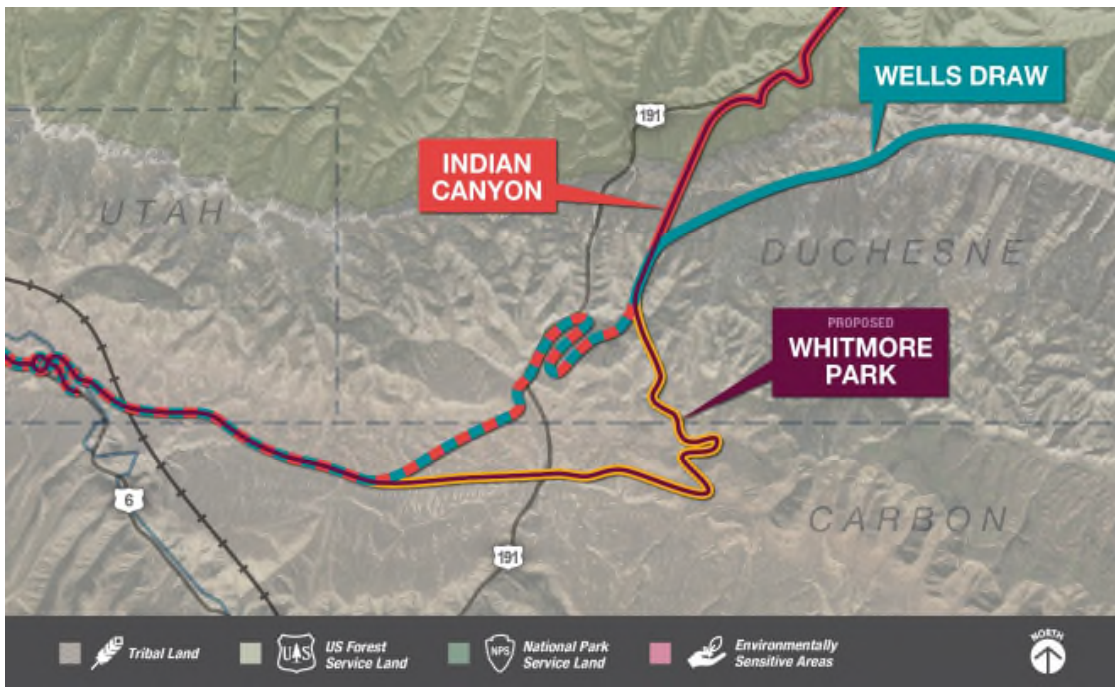
Proposed Preliminary Route Maps – Whitmore Park

PROPOSED PRELIMINARY ROUTE: WHITMORE PARK



UINTA BASIN RAILWAY PROJECT

EMMA PARK AREA



UINTA BASIN RAILWAY PROJECT

