



**City of Glenwood Springs**  
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Glenwood Springs, CO 81601

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**VIA E-MAIL**

Greg Sheehan, Utah State Director  
Bureau of Land Management  
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Monday, August 07, 2023

Dear Director Sheehan:

The City of Glenwood Springs, Colorado, whose lifeblood is the Colorado River and the surrounding natural environment writes to urge the Bureau of Land Management (BLM) to commit to undertaking an Environmental Impact Statement (EIS) to analyze the environmental impacts of Coal Energy Group 2, LLC's proposed Right-of-Way amendment UTU-48027, also known as the Wildcat Loadout Facility (Wildcat Loadout). The Wildcat Loadout project poses grave implications for both the environmental health and economic stability of Glenwood Springs and other affected communities along the Union Pacific Central Corridor Line (the UP Line). Governing federal law mandates that BLM prepare an EIS for a project of this magnitude instead of simply an Environmental Assessment (EA) that will by definition fail to fully assess the proposal's environmental effects.

Glenwood Springs is aware of and has expressed concern over the proposal via the Uinta Railway to greatly increase oil development in the Uinta Basin and the related increase in oil train traffic on the UP Line through the Colorado River corridor. We are very concerned about the environmental and public health risks that such increased oil train traffic poses for our community. Glenwood Springs, which sits along the UP Line paralleling the Colorado River, is home to natural hot springs, whitewater rafting, flyfishing, skiing, and other outdoor activities that draw 1.5 million visitors per year. The nearby White River National Forest is the destination for 10 million people each year, more than any other national forest. At least 40% of the City's residents work in the tourism industry, double the national average. As a gateway to these outdoor activities and natural wonders, Glenwood Springs is particularly vulnerable to the risks the Railway poses to the environment and resulting to the local economy.

Glenwood Springs' experience with economic loss due to environmental disasters is unfortunately both extensive and familiar. The 2020 Grizzly Creek fire is merely one example where over 32,000 acres of forest land, starting just one mile from the City, burned and resulted in long-term closures of I-70, the major interstate connecting Glenwood Springs to the rest of the state. Losses due to food and supply shortages, property damage, and tanking tourism revenue left the City reeling in a time when the pandemic was already

stressing the local economy. The fire's destruction led to constant flooding and debris flows that further restricted travel along the interstate and the Colorado River while sending burnt debris and toxic ash into the river, contaminating vital water resources for communities.

As experience with destructive wildfires is all too familiar, Glenwood Springs is very concerned by the possible reality of constant railway traffic bringing significant increases in the transport of flammable crude oil and train sparks along its path. To this end, the City organized and submitted an *amicus curiae* brief in the the D.C. Circuit Court of Appeals case *Eagle County, Colorado v. Surface Transportation Board*, Case Nos. 22-1019 & 22-1020 (D.C. Cir. 2022) highlighting the Surface Transportation Board's (STB) failure to fully analyze downstream impacts and risks from the Uinta Railway (the Railway) proposal.

The Wildcat Loadout and Uinta Railway proposals are inextricably linked because they will both add significant new oil train traffic to the UP Line. The Wildcat Loadout ROW amendment proposes to increase the facility's capacity from 30,000 barrels per day to 100,000 barrels per day onto rail. This would result in a more than 230% increase in capacity to transload Uinta Basin waxy crude onto the UP Line via the Railway. Projections show the Railway must ship around 350,000 barrels of oil per day along the UP Line for that project to be economically feasible. This would require 9.5 trains of up to 10,000 feet in length traveling the rail line through Glenwood Springs, Glenwood Canyon, and further mountainous points east each day. These longer-than-average trains are heavier, more difficult to control, and more likely to derail. With the increase in railway traffic, the rate of accidents and potential for oil to spill would more than double the current rate along this route.

Further, the risk of wildfires, landslides, and other disasters is fueled by the Railway's path through mountainous terrain. Estimates predict that one fully loaded oil train will derail each year, with a disastrous oil spill resulting from one of these derailments approximately every four years. The Surface Transportation Board's Final Environmental Impact Statement further acknowledges the fact that derailments are more likely to occur on rugged terrain containing "steep slopes" and "narrow canyons". Additionally, the rail line's proximity to hundreds of thousands of acres of national forests and federal public lands is significant given the fact that a single spark from a passing train car could ignite a fire that destroys tens, if not hundreds, of thousands of acres.

The immense increase in accident risk would also threaten the area's precious water resources. The recent train derailments near East Palestine, Ohio and along the Yellowstone River in Montana have shown how disastrous train derailments can be for the environment. In Montana, balls of tar have been found 100 miles downstream of a tank car spill that emptied an estimated 250 tons of petroleum product into the Yellowstone River. Most of the spilled oil substance is expected to remain in the river forever. The Colorado River, considered the most important river in the Southwest United States, sustains the lives of millions of people. The Railway's risk to the river's health and water quality cannot be overstated. The toxic nature of waxy crude oil has long-term negative impacts on the natural world, as it remains in the environment longer than other similar substances. Waxy crude also contains benzene, which is potentially fatal if swallowed and has long-term, harmful effects that lead to genetic defects, cancer, and organ damage. Direct leaks from trains to the water's surface, along with stormflow draining toxins from the railbed to the water, would result in significant water quality degradation.

Once spilled, this toxic substance will contaminate water used for drinking, agriculture, and outdoor recreation such as rafting and kayaking. Leaks and spills from waxy crude also present fatal challenges to the Colorado River's fish and aquatic life. Endangered fish, such as the Colorado pikeminnow, among others, are particularly susceptible to such harms.

All these risks not only would impact the health and longevity of the natural environment but also would dramatically injure the local economy in and around Glenwood Springs. As the Grizzly Creek fire demonstrates, any impacts on the surrounding environment directly influence the ability of the local community to survive. Thus, Glenwood Springs and other similar communities along the Railway line are especially impacted by the risks the Railway project presents. Glenwood Springs is a world destination for outdoor recreation and the home for irreplaceable natural wonders. Given the magnitude of the Railway project, these risks to the natural environment are significant.

Governing law and BLM guidance require an EIS when the proposed action is likely to have significant effects on the environment. 42 U.S.C. § 4332(C); 40 C.F.R. § 1501.3(a)(3); 516 DM11.8(A)(1). In determining whether the effects of a proposed action are significant, BLM must analyze the potentially affected environment and the degree of the effects of an action. 40 C.F.R. § 1501.3(b). The potentially affected environment is not limited to the local area and may be regional or national in scope. *Id.* § 1501.3(b)(1). The degree of effects that BLM must consider include both short- and long-term effects, and the effects on public health and safety. *Id.* § 1501.3(b)(2)(i), (iii). As described above the potential effects of the Wildcat Loadout are significant to a large regional or even national area in scope. BLM must thoroughly analyze these threats from an oil spill, explosion, and wildfire as well as the likely ensuing socioeconomic consequences on communities like Glenwood Springs.

Thank you for your consideration of our request. We look forward to fully participating in the forthcoming NEPA process surrounding the Wildcat Loadout.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ingrid Wussow', is written in a cursive style.

Ingrid Wussow  
Mayor