



FRIENDS of GREAT SALT LAKE

150 South 600 East, Suite 5D • Salt Lake City, UT 84102 • (801) 583-5593 • www.fogsl.org

Surface Transportation Board
Docket No. FD 36616
FRIENDS of Great Salt Lake Comments

1. Under Title 49 1105.6 (d) the Board may reclassify or modify these requirements [Classification of Actions] for individual proceedings.
2. For actions generally requiring an Environmental Assessment (EA), the Board may prepare a full Environmental Impact Statement (EIS) where the probability of significant impacts from the particular proposal is high enough to warrant an EIS.
3. FRIENDS of Great Salt Lake recommends conducting an EIS because potential impacts are likely significant when assessed relative to air quality, water quality, wetlands, wildlife habitat, threatened and endangered species, cultural/historic resources, environmental justice, and climate change, especially when considered cumulatively with other development occurring in this area and the extremely high value of natural resources and human environment found in the project area.
4. Modelling air and water quality impacts should be mandatory for a project that will increase rail traffic within non-attainment areas, critical water resources, and internationally significant wildlife habitat. This level of assessment is typically not included in an EA.
5. Similarly, an impact mitigation and monitoring plan must be included in an analysis and an EIS is the appropriate NEPA document for this information.
6. Since the results of an EA will likely require completion of an EIS and not a Finding of No Significant Impact (FONSI), drafting an EA is unnecessary.
7. The effects to wetlands and other waters of the U.S. could be significant enough to not only require a Department of Army Permit but also a third-party EIS coordinated by the U.S. Army Corps of Engineers. In lieu of attaching an EIS to a future permitting process, the EIS should be completed as part of the project planning phase, i.e., STB review.

Sincerely,

Lynn de Freitas, Executive Director

The mission of FRIENDS of Great Salt Lake is to preserve and protect the Great Salt Lake Ecosystem and to increase public awareness and appreciation of the lake through education, research, advocacy, and the arts.