Save the Dunes respectfully submits the following comments regarding the proposed acquisition of Norfolk Southern Railway Company by Union Pacific Railroad Company.

Save the Dunes is an environmental nonprofit working in Northwest Indiana. As an official partner of the Indiana Dunes National Park (Park), Save the Dunes has consistently supported efforts to protect and preserve the natural resources of the Park. We work to advance shared goals in land preservation, habitat restoration, and public access—ensuring the dunes are protected for future generations to enjoy.

Our organization recommends that the Office of Environmental Analysis (OEA) consider the environmental and operational risks to the Park- such as fire risk, natural resources impacts, visitor use, and other related factors.

Emergency Services Delay Concerns

The applicant's updated tables project an increase of approximately 4 trains per day on rail crossings that are adjacent to Park areas, including segments 10059 and 10060, which encompass the County Line Road and Mineral Springs Road crossings. The statistics given also show an 87 percent increase in annual gross ton miles between Michigan City and Porter in Northwest Indiana. County Line is a vital access route for the Park and local first responders to reach Indiana Dunes West Beach, and is particularly important during periods of peak visitation. Increased rail traffic through this route could disrupt park operations and emergency response, including the efficiency and reliability of access for first responders traveling to the park.

We ask that the OEA do an analysis to determine whether the increase in train activity would affect emergency access to the park. If the OEA determines that an increase in rail traffic would lead to delays, we request that the applicants establish reliable coordination with local emergency responders and develop a protocol for promptly clearing rail crossings during emergency events.

Wildfire Risk

Following recent severe storms in our region, portions of the Park adjacent to active railways currently contain large amounts of woody debris from fallen trees. Given the applicant's projection of a significant increase in rail activity, we recommend that the OEA analyze whether increased activity would affect train-related fire risk and access for fire-related first responders under current conditions. Coordination with the Park staff on any fuel management activities on rights-of-ways adjacent to the Park would be ideal to protect sensitive natural areas within park boundaries.

Visitation Traffic Concerns

The Mineral Springs Road Crossing (segment 10060) is a highly used road, as it provides access to the Indiana Dunes National Park headquarters and multiple Park areas used by visitors. We recommend that the OEA analyze if the projected increase in train operations could lead to Park specific impacts, including effecting access to these Park areas, emergency response, and visitor experience due to train horns and other locomotive related emissions.

Natural Resources and Invasive Species Concerns

Indiana Dunes National Park is one of the most biodiverse parks in the US, supporting a remarkable variety of plant communities and more than 1,100 plant species living within the Park boundaries. Due to our Park's unique ecological significance to Northwest Indiana, we recommend that the OEA analyze whether increased train activity would create additional risks to sensitive plant communities and vulnerable natural resources.

Increased train activity may also increase the introduction and spread of invasive species. For example, the Indiana Department of Natural Resources states that the invasive spotted lanternfly can be spread through materials commonly transported by rail, and that recent sightings of the species have occurred near railroad tracks. We recommend that the OEA require the applicants to implement a protocol to include targeted monitoring for invasive species, timely treatment and control measures, and coordinated communications with the Indiana Dunes National Park staff regarding natural resource management activities within and along their rights-of-ways.

For these reasons, Save the Dunes requests that the OEA require the applicants to implement a protocol addressing invasive species, fire hazards, and potential disruptions to emergency vehicles and park visitors associated with increased rail activity. We further ask the OEA to require the applicant to coordinate and collaborate with the Indiana Dunes National Park staff on events or incidents that may affect Park resources, visitor experience, and emergency access for first responders traveling to the Park.

Thank you for considering these comments. If you have any questions, please contact our Manager of Government Affairs and Policy, Harshini Ratnayaka, at (219) 879-3564 ext. 101 or harshini@savedunes.org.

Sincerely,

Harshini Ratnayaka

Harshini Ratnayaka
Manager of Government Affairs and Policy