

Wayland, Joshua

From: Scolari, Paul <paul_scolari@nps.gov>
Sent: Thursday, May 09, 2019 9:29 PM
To: Wayland, Joshua
Cc: Baldwin, Lisa; David Hurd
Subject: NPS Comments on Proposed Uinta County Railroad Line in Northeast Utah
Attachments: NPS Comments Uinta Basin Railroad Line Proposal - 5-9-2019.PDF

Joshua-

Attached please find NPS' comments on the above-referenced railroad line proposal. Thank you for the opportunity to provide comments, and please refer to the contact information in the attached letter should you have any questions.

Paul

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United States Department of the Interior

NATIONAL PARK SERVICE
Dinosaur National Monument
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In reply refer to:

1.D

VIA ELECTRONIC MAIL – NO HARD COPY TO FOLLOW

May 9, 2019

Joshua Wayland
Surface Transportation Board
c/o ICF
9300 Lee Highway
Fairfax, VA 22031

Dear Mr. Wayland

Dinosaur National Monument (DNM) has reviewed the proposal by the Seven County Infrastructure Coalition to build approximately 80 miles of railroad to transport commodities and products into and out of the Uinta Basin in northeastern Utah. We appreciate the opportunity to provide you with our preliminary comments regarding potential effects on the monument's air quality and air quality related values, viewsheds, and dark night skies.

Dinosaur National Monument was established in 1915, when President Woodrow Wilson set aside the original 80-acre monument to protect the 'extraordinary deposit' of dinosaur fossils. In 1938, President Franklin Roosevelt expanded the boundaries by over 200,000 acres to protect the surrounding canyons of the Green and Yampa Rivers. Known as one of the 'hidden jewels' of the NPS, the geologic and paleontological resources in DNM showcase millions of years of natural processes and associated plant and animal life. In addition, DNM contains exceptional biological diversity and species abundance with over 1,000 native plants and animal species found within six major vegetation communities. DNM also contains 46 miles of the lower Yampa River, the last remaining free-flowing large river in the Colorado River System. DNM provides a unique opportunity to study river science as our 'laboratory' contains the unregulated Yampa, the regulated Green below the Flaming Gorge Dam, and a 'hybrid' river below the confluence of both rivers. Furthermore, DNM contains evidence of at least 10,000 years of human history including the Fremont Culture, Spanish Exploration, European and early American settlement, homesteading, and ranching. DNM also provides a wealth

of enjoyment and educational opportunities for the approximately 315,000 visitors who contribute over \$20 million in local economic benefits annually.

DNM is concerned about potential impacts to the monument's resources and visitor experiences that could result from the construction and operation of a rail line near the Canyon Visitor Center in Dinosaur, Colorado and near the Quarry Visitor Center in Jensen, Utah. DNM specifically requests the evaluation of the following resources in the environmental impact statement (EIS):

Air Quality and Air Quality Related Values

One purpose of the Clean Air Act (CAA) is "to preserve, protect, and enhance the air quality in national parks" (42 U.S.C. §7470(2)). Pristine air quality and nearly limitless views are an integral part of the visitor experience at DNM and are a necessary part of maintaining our viewsheds and dark night skies. Service-wide visitor survey data (1988-2011) showed that park visitors highly value clean air and scenic views, with 90% of respondents stating that scenic views are very important to extremely important in NPS units. The respondents also expressed that clean air and scenic views are among the top five most important attributes worthy of protection in national parks.

In recent years, wintertime ozone levels in the Uinta Basin have exceeded the National Ambient Air Quality Standards (NAAQS) and portions of Duchesne and Uintah counties were recently designated as being in nonattainment with the 2015 ozone standard. Pollutants of concern (both primary and secondary) include nitrogen oxides (NO_x), particulate matter (PM_{2.5} and PM₋₁₀), sulfur dioxide (SO₂), volatile organic compounds, ozone (O₃), greenhouse gases, and hazardous air pollutants. These pollutants can contribute to visibility degradation in national parks, adverse effects to human health which is a concern for park visitors and staff, adverse ecosystem effects from excess nitrogen and sulfur deposition and ozone impacts to vegetation. Ozone and visibility are of significant concern for DNM. We request that impacts to these resources are evaluated during the environmental analysis process.

Visual Resources

Visual impacts from the proposed rail line are also a concern for DNM. Scenic vistas from high elevation points within the monument provide dramatic views of a remote and far-reaching landscape that includes montane peaks, high desert plateaus, entrenched canyons carved by the Yampa and Green Rivers, and expansive skies. These vistas are fundamental to the visitor experience at the monument.

The current visual setting of the park is predominantly natural with minimal human-caused intrusions. Rail line development could negatively affect views and dark night skies by altering the broad vistas available from the southern portions of the park. The National Park Service (NPS) requests a detailed visual impact assessment for the Craig route alternative—including potential changes in the visual landscape from several important park viewpoints: 1) the entrance to the park near the Canyon Visitor Center

off of US 40 approximately 3 miles east of the town of Dinosaur, Colorado; 2) the entrance to the park at the Deerlodge Road off of US 40 approximately 18 miles west of Maybell, Colorado; 3) Plug Hat Butte and Escalante Overlooks located along the Harpers Corner Road which begins at the Canyon Visitor Center; and 4) the Quarry Visitor Center and Exhibit Hall located off of US 40 north of Jensen, Utah.

The NPS recommends mitigations to reduce viewshed impacts, including efforts to design new rail lines to blend into the existing topography and landscape to reduce visibility. In addition, nighttime activity should be reduced to the minimal amount possible. Fugitive dust during construction and operations is also a concern for both air quality and visual resources. Given dry, windy conditions, windblown fugitive dust could reach a 50-mile radius, which would include DNM. The NPS recommends monitoring and adaptive management of fugitive dust to ensure minimal impacts on local and regional air quality and visual resources.

Naturally Dark Night Skies

For visitors looking for nighttime recreation opportunities, DNM has a designated night sky viewing area (Split Mountain) on its official map. The park regularly hosts night sky programs for visitors, and has just been awarded an International Dark Sky Park (IDSP) designation. Including a Utah Symphony "Great American Road Trip" event intended to connect with rural communities and celebrate dark skies, as well as night sky opportunities associated with the Great American Eclipse, there were an estimated 4,993 astronomy-related DNM visitor contacts in 2017.

If nighttime construction occurs, then lighting associated with the construction of a rail line has the potential to adversely impact the naturally dark skies of DNM, via increases in artificial sky glow. Excess artificial light can impact wildlife habitat and behavior. It can likewise impact recreational night-time activities, such as star gazing, camping, hiking, dispersed recreation, and driving. If any permanent lighting is installed, we recommend the use of downward directed, fully shielded lights of warm color temperature, with sensors or other controls to limit lighting intensity and duration to only the extent it is needed.

Natural Soundscapes

Human caused noise from construction equipment, machinery, and other transportation traffic can affect human environments, visitor experience and wildlife species. Because U.S. 40 is lightly traveled, increases in construction and operational traffic could produce noticeable impacts on park visitors in the areas of Dinosaur, CO or Jensen, UT or one of the DNM visitor centers. All transportation vehicles using portions of U.S. 40 adjacent to DNM sites during construction of the rail line should have appropriate mufflers, in good working condition, that meet or exceed the requirements of 40 CFR 205, Colorado statute 42-4-225, and where appropriate, Utah code 41-6a-1626.

If you have any questions or need additional information, please contact Lisa Baldwin,
Chief, Resource Stewardship and Science, at (970)374-3064 or at
lisa_baldwin@nps.gov.

A handwritten signature in dark ink, appearing to read "Paul Scolari". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Scolari

cc:

Victoria Rutson, Director, Office of Environmental Analysis