



3 August 2019

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

Attention: Environmental filing, Docket No. FD 36284. Uinta Railway

Dear Mr. Wayland,

The following are scoping comments offered by the Nine Mile Canyon Coalition. The Nine Mile Canyon Coalition is a nonprofit corporation organized exclusively for charitable, educational and scientific purposes including:

- The preservation and protection of Nine Mile Canyon
- The education of the public on the issues and resources relating to Nine Mile Canyon
- The provision of assistance to coordinate Nine Mile Canyon interests
- The promotion of scientific research of the natural and cultural resources of Nine Mile Canyon.

The Coalition is a recognized consulting party under NHPA for this project. These comments do not address specific historic resources, as we will bring those forward through the 106 consultation process.

Concerns Common to All Alternatives

The route from Wellington to Myton via Nine Mile Canyon, Gate Canyon, and Wells Draw is a designated National Backcountry Byway. The EIS must consider the impacts of the railway on the Byway, including the scenic, historic and experience qualities. Mitigation opportunities should be identified for all adverse impacts.

Concerns for the Wells Draw Route Alternative

1. Duchesne County is planning upgrades to the Gate Canyon Road. One alternative would widen the road while mostly keeping existing grade and alignment. The county preferred alternative would involve major realignment and changes to the grade involving cut and fill slopes of over 180 feet. The EIS must disclose how the railway would affect the two county road improvement alternatives. Commitment to complete one or the other should probably be made prior to railroad construction.
2. The drainages coming off the north slopes of the Nine Mile Canyon drainage are famous for producing flash floods and debris flows. These are almost yearly events. The EIS should address how the railroad will deal with these geological hazards. Along with considering the protection for the railroad, the EIS should consider how the railroad will affect runoff and drainage, including overland flow. Typically when railroads are constructed across a slope, the

drainage is focused to culverts and underpasses resulting in accelerated erosion downslope of the railroad bed. The design must be such as to minimize any accelerated erosion.

3. Nine Mile Canyon is also highly prone to rock fall events. How will construction and use of the railroad affect the risk and prevalence of rock fall through construction activity including use of explosives, heavy equipment, and vibration caused by the trains?

4. Analyze the impacts of noise propagation in Nine Mile Canyon during both the construction and use phases of the project. Along with considering sound volume and DbA, provide multi octave analysis of both tonal and low frequency noise components.

5. For evaluation of Scenic Resources, use the VRM inventory rather than BLM management classes for baseline. The inventory is most reflective of the affected environment and should be the baseline for analysis.

6. The route traverses a BLM designated ACEC for Nine Mile Canyon. The analysis should include disclosure of impacts to the ACEC generally and specifically analyze the effect on each of the Relevant and Important Values.

7. This route alternative also traverses a BLM designated Special Recreation Management Area. Analysis should address the impacts of the alternative on the objectives of the SRMA as well as the recreation opportunity, experience and benefits.

8. Argyle Creek has been identified by BLM as being eligible for designation as a wild and scenic river. National BLM policy requires NEPA documents for projects affecting eligible WSR segments be analyzed for impacts to: free flowing characteristics, Outstandingly Remarkable Values and tentative classification.

9. Potential impacts to cultural resources are a major concern. The West Tavaputs in general and Argyle Canyon and Wells Draw specifically are known to have a variety of prehistoric and historic remains. Surface disturbance activities in Nine Mile Canyon proper have demonstrated that many times there are no surface manifestations of buried cultural materials. A discovery and mitigation plan needs to be developed and implemented to recognize and protect/mitigate the cultural resources.

Sincerely yours,

A handwritten signature in black ink that reads "Dennis J. Willis". The signature is written in a cursive, flowing style.

Dennis Willis
Director, Nine Mile Canyon Coalition
(435-650-0850)