



# United States Department of the Interior

U. S. GEOLOGICAL SURVEY

Reston, VA 20192

In Reply Refer To:  
Mail Stop 423  
ER 07/555

August 7, 2007

E 1  
# 3107  
pgs

## MEMORANDUM

To: State Director  
Bureau of Land Management, Salt Lake City, Utah

From: James F. Devine /Signed/  
Senior Advisor for Science Applications

Subject: Review of Draft Environmental Impact Statement for the Six-County Association of Governments' Proposed 43-Mile Rail Line in Sanpete, Sevier, and Juab Counties, Utah

As requested by the U.S. Department of the Interior, Office of Environmental Policy and Compliance, in their correspondence of July 11, 2007, the U.S. Geological Survey (USGS) has reviewed the subject draft environmental impact statement (DEIS) and offers the following comment.

### **SPECIFIC COMMENT**

#### **Section 4.3, Impacts on Biological Resources Impacts, pages 4-23 through 4-36**

The Surface Transportation Board (STB) is commended for including a methodology (page 4-23) for determining the potential impacts on plant communities, wildlife resources, threatened and endangered species, and sensitive species in the study area resulting from the proposed project alternatives. It would benefit the public, however, if an explanation was provided as to why the STB, in consultation with the U.S. Fish and Wildlife Service, proposes (page 4-23) to include only "pedestrian observational surveys" and not conduct any specific survey protocols to determine the potential impacts to species in the study area. It would also benefit the public to know the precise steps and general period of time for clean up actions should there be (page 4-25, 3rd paragraph) a coal or petroleum spill "to prevent irreparable harm to the environment."

Additionally, there are several general statements in the DEIS that may warrant scientific documentation. For instance, scientific analysis of species specific impacts from the proposed construction and operation of the rail line appears to be warranted. The DEIS also states that (pages 4-25 and 4-27) "herbicides could affect the surrounding plant communities [and wildlife habitat] if they are improperly applied." The DEIS seems to imply that if herbicides are applied properly, there would be "no" impacts on biological resources. The final EIS could be improved by accessing the potential impacts of herbicide use on plant communities and wildlife habitat, as

well as potential impacts on wildlife and aquatic species resulting from stormwater run-off containing herbicides entering streams, lakes, reservoirs, and wetlands within the project area.

Other generalized statements in the DEIS that warrant scientific documentation, scientific analysis, and supporting references includes, but are not limited, to the following:

- "SEA expects that the impacts from constructing and operating a rail line with anticipated traffic of one round trip ... per day would not contribute significantly to habitat fragmentation and the alteration of wildlife behavior in the project area." (page 4-26)
- "Construction activities would temporarily displace several species of wildlife during construction, but they would likely return after construction." (page 4-27)
- "Construction of Alternative B would result in a relatively small amount of habitat loss within wildlife corridors for migratory birds and big-game mammals. However, because of the timing of the construction of the rail line and the temporary nature of construction, SEA does not anticipate that these construction activities would be a substantial barrier to wildlife movement. Construction of Alternative B would not compromise the biological function of these wildlife corridors." (page 4-28)

Thank you for the opportunity to review and comment on this DEIS. If you have any questions concerning our comments, please contact Lloyd Woosley, Chief of the USGS Environmental Affairs Program, at (703) 648-5028 or at [lwoosley@usgs.gov](mailto:lwoosley@usgs.gov).

Copy to: Office of Environmental Policy and Compliance