



# United States Department of the Interior

**BUREAU OF LAND MANAGEMENT**

**RICHFIELD FIELD OFFICE**

150 East 900 North  
Richfield, UT 84701  
<http://www.ut.blm.gov>



IN REPLY REFER TO:

MAY 02 2003

2800  
(UT-050)

April 30, 2003

Mr. Rick Black  
HDR Engineering, Inc.  
3995 South 700 East, Suite 100  
Salt Lake City, Utah 84107-2594

Attn: Finance Docket No. 34075 – Environmental Comments

Dear Mr. Black:

Please refer to your letter dated April 1, 2003, requesting comments or issues on potential environmental impacts concerning the proposed rail line between Levan and Salina, Utah.

It appears that the preferred route would cross fewer BLM managed public lands than we had anticipated. However, there are still a number of issues and questions we have concerning potential impacts to existing resources, and of the long-term feasibility of this project. Some of the issues that we recognize at this point (based upon the very preliminary data now available) that need to be addressed include:

1. What would the potential impacts be upon existing authorized utility rights-of-way throughout the area? This would include highways, electric power lines, telephone lines, and natural gas lines. Which utilities would be directly impacted by construction of the rail line?
2. What would the potential conflicts and impacts with existing land uses in the area, specifically livestock grazing, recreational uses, mineral exploration operations, and wildlife habitat?
3. Would construction of a rail line create significant impacts to other resources values such as historical and cultural resources, Native American values, and biological resources (especially threatened and endangered species)?
4. Would the rail line isolate and fragment public lands (and grazing allotments) and create management problems? Route locations utilizing state owned lands where feasible, and designed to be located in proximity to exiting irrigation canals and power lines could help with this problem.
5. What are the alternative routes being studied? Depending on location, there could be additional issues that need to be addressed.
6. We are concerned about the financial obligations and capabilities involved in a project of this size. What guarantees for economic feasibility, financial viability, and long-term operational stability are there? Who would be the main sources of necessary long-term financial responsibility for the railroad? Have their funds and assets been analyzed so secure funding can be determined? Can they assure full underwriting for the life of the railroad including all necessary bonding requirements?
7. What is the projected life span of the rail line and how closely would it be tied to the operational viability of the coal mine? What happens to the rail line when the mine ceases operations?

8. Have the socio-economics effects for the region been considered to this point?
9. Have all necessary licensing, permitting, certifications, and oversight been fully considered to warrant further analysis of the project? Are agreements in place to assure long-term access, connection, use, and interchange of existing rail lines?
10. Would there be any needed ancillary uses associated with the rail line on public lands?
11. What kind of vehicle access along the rail line and to sidings would be necessary for operational and maintenance purposes? Would this involve new roads? If so, what type of roads? Access along the rail line would also be necessary for public uses where existing roads would be changed or existing transportation routes may be eliminated.
12. What assurances are in place to secure contractual utilization of the rail line by entities desiring transportation and delivery of goods?
13. What type of mineral materials and sources would be necessary for construction of the railroad?
14. This proposed project would likely cross 10 or more different livestock allotments, possibly requiring permit changes. Specific line routes may require different actions. Some of the necessary conditions might include: fencing the railroad right-of-way for livestock safety; construction of specific undercuts, culverts, or underpasses for livestock, wildlife, and vehicle movement and access; adjustment of livestock permits due to loss of AUM's; other requirements to compensate for possible splitting and isolation of portions of the allotments.
15. Specific reseeding requirements would be necessary to mitigate all disturbed areas.
16. Long-term noxious weed controls would be required.
17. Impacts to Yuba Reservoir would need to be studied closely, especially at the location proposed for bridging at the narrows. How would recreational uses at the reservoir be impacted with this span? Would public recreational uses in other areas be affected by construction of the railroad?
18. Visual impacts throughout the area needs to be studied closely. Current VRM classification is mostly IV with some III.

We appreciate the opportunity to provide comments and questions to you on this project. We recognize the need for a rail line in this area, but also, we have definite concerns about potential impacts to the resources we manage and if these impacts can be effectively avoided or mitigated. Based upon the generality of the project, most of our comments are fairly general. As more information is known, we will have more specific comments to make. Please keep us informed as this project progresses.

If you have any questions about this response, please contact Mr. Rodney Lee at 435 896-1524.

Sincerely,

  
Aden L. Seidlitz  
Field Manager