



International Dark-Sky Association

"... to preserve and protect the nighttime environment and our heritage of dark skies"

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Kansas City Regulatory Office
402 Federal Building
601 East 12th Street
Kansas City, Missouri, 64106-2896

August 14, 2009

Re: BNSF Facility Draft Environmental Assessment

Dear Mr. Marx:

I would like to comment on the Draft Environmental Assessment for the BNSF Intermodal Facility near Gardner, in Johnson County, Kansas dated July 2009. In particular, I would like to speak about the Lighting and Visual Aesthetics in Section 5.2.2, Facility Features.

Section 5.2.2 Facility Features
Lighting and Visual Aesthetics

- The site design incorporates directional light hoods to minimize off-site light intrusion and night glow, tower heights, and the number and spacing of lights needed to illuminate only necessary areas including the cranes. Tower heights and spacing have been optimized to meet lighting level requirements for safe operations.
- The site design includes landscaping and other aesthetic treatments at locations where the general public would see the facility. Some of the landscaping features include building treatment colors, landscaping, and vegetative screening to minimize the visibility of the facility to the surrounding areas.

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Due to the lack of quantitative numbers on Light Trespass, Skyglow, Glare and lighting level requirements or a lighting plan; I can only assume this facility will be designed similar to the BNSF facility located near I-635 and I-70, the Argentine Yard. The Argentine Yard uses directional light hoods and aims them sideways, into highway traffic and surrounding properties. These misdirected lights represent a traffic safety issue and a possible health issue to any surrounding residential properties.

Lighting at the Argentine Yard results in an increase of sky brightness and impairs the night sky for many miles. Many of the lights are aimed so that much of the light is directed into the sky. A footnote on Table 2-1: Analysis of Alternative Development Areas mentions the Olathe location lighting could conflict with New Century Air Center operations. It is highly questionable that any of the proposed facilities would only result in "minor adverse effects to the visual quality of the area are anticipated".

IDA Offices

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Please provide a detailed lighting plan and environmental analysis for the site.
Including:

- Light trespass, Glare and Skyglow levels
- Fixture specifications
- IESNA cutoff classification and aiming instructions
- Potential impacts on human health and sleep
- Impacts on traffic safety
- Impacts on flora and fauna including migratory and endangered species that may be impacted by light at night
- Impact on State Parks and Conservation Areas including Hillsdale State Park

While it may be possible to design this facility in such a way that it minimizes its impact upon surrounding communities, current BNSF lighting standards and practices show little concern for traffic safety, human health or surrounding communities.

I would recommend that BNSF fix its existing facilities to demonstrate their ability to control Light Pollution before building any new facilities. Additionally, the U. S. Army Corps of Engineers should refer to *Unified Facilities Criteria, Design: Interior and Exterior Lighting and Controls (UFC 3-530-01)* produced by the Department of Defense, August 22, 2006 and available at:

http://www.wbdg.org/ccb/DOD/UFC/ufc_3_530_01.pdf

for detailed information on Light Pollution control and remediation.

Sincerely,

Robert Wagner
Board Member
International Dark-Sky Association
<http://www.darksky.org>

CC: Kansas Department of Wildlife and Parks

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