



Clean River ♦ Healthy Community

March 28, 2018

U.S. Army Corps of Engineers
Walla Walla District
Attn: Shane Slate
Coeur d'Alene Regulatory Office
1910 Northwest Boulevard, Suite 210
Coeur d'Alene, Idaho 83814-2676

RE: Proposed BNSF Bridge Project, Lake Pend Oreille, APPLICATION NO: NWW-2007-01303

Dear Mr. Slate,

I am writing in response to the proposed Burlington Northern Santa Fe (BNSF) Bridge Construction Project. Permit Application NO: NWW-2007-01303.

The Spokane Riverkeeper's mission is to protect and restore the health of the Spokane River watershed and to defend our right to a clean Spokane River. The Spokane Riverkeeper advocates for clean water and educates the public about issues that impact our waters. Citizens are encouraged to get involved and stay connected to their Spokane River, one of the region's most valuable natural assets.

This proposed project would create numerous direct, indirect and cumulative impacts affecting the city of Sandpoint, Bonner County, Idaho, and for the down rail region in the Spokane Valley and the City of Spokane, Washington.

1. If constructed the proposed bridges would create potential impacts for species listed under the Endangered Species Act (ESA). Bull trout are threatened under the ESA and no longer occupy much of their former range in the interior mountain west. The proposed fill as well as the potential of trains spilling coal and/or oil under transport pose grave dangers to these already vulnerable populations of native fish in Lake Pend Oreille. Additionally, when completed, the bridges will exacerbate the potential impacts to interior redband trout living in the Spokane River, down rail in the Spokane Valley. These species of native trout are listed as a species of concern in Washington State and any spill of coal or oil could irreparably damage redband trout populations and their long term habitat.
2. The traffic that is added to the down rail lines in Washington State have other cumulative impacts. There is an increased risk of an oil spill over the Spokane Rathdrum Prairie Aquifer. This aquifer is very shallow, protected only by a shallow lens of gravel in most places, and has been designated by the Environmental

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Protection Agency as a sole source of drinking water for the entire region. A spill of Bakken crude oil or Alberta diluted bitumen oil could cause irreparable harm to this valuable community resource. Increasing rail traffic only increases the odds of such an accident.

3. Additionally, the increased traffic that this project would bring, puts our communities at risk. Spokane City officials and first responders have identified deep concerns with the transportation of crude oil by rail through these down-rail communities. An oil spill in down town Spokane that catches fire, presents a situation for which there is no immediate or appropriate response. Many citizens would be put at risk in such a scenario. Washington State has identified oil spilling by rail a significant potential in the permitting process for other west coast oil by rail projects.

Spokane Riverkeeper is asking that you evaluate BNSF's proposal as a serious risk to the environment region wide. It also presents localized impacts to the areas under construction at Lake Pend Oreille. As such, we request the following:

1. Extend the public comment period by 120 days from the date of the public notice.
2. Draft a full environmental impact statement for the proposed project.
3. Fully analyze the cumulative impacts (both locally and in the region) of BNSF's proposal both in Idaho at the point of construction, as well as far down rail in Washington State and in Spokane WA.
4. Conduct at least one public hearing before the environmental impact statement is completed and at least one public hearing after it is released.

In conclusion we feel that this proposed project will affect the built environment, the natural environment and will carry risks from the transport of oil to the entire region. Please consider these impacts to the communities of our region and our natural world.

Thank you for the opportunity to comment.

Respectfully,



Jerry White Jr.
Spokane Riverkeeper

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