



March 13, 2018

VIA E-MAIL

U.S. Army Corps of Engineers

USACE - Shane Slate - NWW_BNSF_Pendoreille@usace.army.mil

U. S. Coast Guard

USCG - Shelly Sugarman - shelly.h.sugarman@uscg.mil

RE: Application NO. NWW-2007-01303; Proposed rail bridge over Lake Pend Oreille

Dear Mr. Slate and Ms. Sugarman,

The City of Sandpoint requests an extension to the public comment period for the proposed second rail bridge over Lake Pend Oreille. A 30-day comment period is not long enough to solicit meaningful public comment for a project of this magnitude and potential effect on our small town.

I respectfully request that the public comment period be extended at least 90 days for a total of 120 days, with the public comment period ending on June 26, 2018. This extended period of time will allow both year-round and seasonal residents of the City of Sandpoint enough opportunity to thoroughly review the 250+ page permit application, formulate meaningful comments and share them with permitting agencies.

It's my understanding that the Army Corps of Engineers plans to hold a hearing in Sandpoint. Not everyone would be able to attend a single hearing. I respectfully request that at least three (3) public hearings be held in Sandpoint to consider the proposed project. Ideally, two public hearings would be held prior to the development of the Environmental Assessment (EA) and one public hearing held after the release of the draft EA. These opportunities would allow the public to thoroughly vet the proposal, share their concerns and suggest alternatives. The proposed project has the potential to significantly impact the people and environment of Sandpoint and warrants the additional public hearings.

Public Health and Safety:

The construction of a second rail track will allow for an increase in rail traffic. The rail lines through our City currently cause problems for our emergency responders. Emergency responders and residents currently experience extended delays at crossings, which puts the person requiring medical attention in a potential life-threatening situation. Increased rail traffic will cause a greater delay for emergency

response. The City cannot afford the high cost of comprehensive monitoring devices that alert emergency responders to a blocked crossing. Another alternative would be to add new emergency response infrastructure, like a satellite fire, police and EMS station on the north side of Sandpoint. However, this would cost up to \$1.5 million dollars and require ongoing costs to maintain and staff the satellite station. Similarly, the cost of other rail infrastructure improvements, such as overpasses or underpasses would be a huge burden on City taxpayers. This is a burden that a town of 7,500 residents cannot afford.

The City receives frequent noise complaints. An increase in rail traffic will undoubtedly exacerbate problems and citizen complaints that we currently receive. The City has looked into creating quiet zones, but even this step is financially unavailable to the City.

Environmental Concerns:

Hazardous materials are transported along the shores and over Lake Pend Oreille every day via the existing rail bridge in Sandpoint. With respect to transport of volatile crude oil and coal, transport of these commodities could increase if export terminals, refineries and other related infrastructure are built along the west coast.

Transport of coal and crude oil threatens the water quality of Lake Pend Oreille and the downstream of Pend Oreille River. Coal and coal dust released from open rail cars introduces heavy metals such as mercury, lead and arsenic into our waterways. Oil spills are notoriously difficult to contain. Our communities are not prepared to address the environmental fall out from a coal or oil train derailment into Lake Pend Oreille.

Lake Pend Oreille and the Pend Oreille River provide potable drinking water to thousands of residents and visitors. A public water treatment facility on Lake Pend Oreille serves residents of Kootenai, Ponderay, Sandpoint and parts of unincorporated Bonner County

A derailment of a train carrying hazardous materials adjacent to or over Lake Pend Oreille would pose a significant risk to those that depend on these waterbodies for a source of clean water. Derailments of crude oil trains have impaired waterbodies across the country, including rivers and wetlands, and pose a serious threat to public safety.

Lake Pend Oreille and the Pend Oreille River are also extremely popular with all types of recreationalists, including anglers and hunters, and the waterways serve as important habitat for a diverse array of wildlife. The increase in capacity of trains carrying hazardous material enhanced by a second rail bridge will directly threaten recreational activities and sensitive wildlife habitat.

Public Interest:

A second rail bridge over Lake Pend Oreille could significantly increase current rail traffic. Increased rail traffic has been demonstrated to cause an increase in accidents at crossings. According to data collected by the U.S. Department of Transportation, the number of accidents significantly increases when the number of trains exceed thirty (30). Increased traffic will also result in significant delays at crossings. The City has estimated that an approximate doubling of rail traffic would result in traffic delays of up to six (6)

March 13, 2018

Page 3 of 3

hours per day, causing economic losses of \$575,000, which is an increase of \$300,000 attributed to current traffic delays.

The risk of derailment and subsequent spills of toxic materials, such as Bakken crude oil, also increases with additional rail traffic. As previously mentioned, the rate of oil train derailments continue to increase across the United States with disastrous consequences for the affected communities. Emergency responders within the Lake Pend Oreille region admittedly do not have the resources needed to adequately address an oil train disaster. With the cost of an oil train derailment disaster estimated in the billions of dollars, communities like Sandpoint would face the possibility of financial ruin.

In conclusion, for the reasons stated above, I respectfully request the following:

1. The public comment period to last a total of 120 days, ending on June 26th, 2018.
2. At least three (3) public hearings held in Sandpoint to consider the proposed project. Ideally, two (2) public hearings would be held prior to the development of the EA and one public hearing held after the release of the draft EA.

Thank you for your consideration.

Sincerely,



Shelby Rognstad
Mayor

CC:

U.S. Fish and Wildlife Service: Gregory Hughes - greg_m_hughes@fws.gov
Idaho Department of Lands: Tom Fler - tfler@idl.idaho.gov
Idaho Department of Environmental Quality: June Bergquist - june.bergquist@deq.idaho.gov
Kalispel Tribe of Indians: Deane Osterman - dosterman@knrd.org
Kootenai Tribe of Idaho: Kevin Greenleaf - greenleaf@kootenai.org
Coeur d'Alene Tribe: Tyrel Stevenson - tstevenson@cdatribe-nsn.gov
Confederated Salish and Kootenai Tribes: Misty Doss - misty.doss@cskt.org
Spokane Tribe of Indians: B.J. Kieffer - bjk@spokanetribe.com