



May 3, 2018

Steven M. Fischer
U.S. Coast Guard
Thirteenth Coast Guard District
915 2nd Avenue, Room 3510
Seattle, WA 98174

The Honorable Ronald Batory
Federal Railroad Administration, Administrator
1200 New Jersey Ave., S.E.
Washington, DC 20590

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

The Honorable Ann D. Begeman
Surface Transportation Board, Chairman
395 E Street, S.W.
Washington, DC 20423-001

Re: BNSF Railway Sandpoint Junction Connector Proposal in Sandpoint, Idaho

Dear Agency Representatives:

I am writing to share our community's interest in the potential impacts of BNSF Railway's proposal to construct a series of railroad bridges through and nearby Sandpoint, Idaho. One of these bridges would span nearly a mile across Lake Pend Oreille, Idaho's largest lake.

Many communities in North Idaho were born with the railroads and have embraced railroads as an integral part of our regional identity. However, projects like BNSF's Sandpoint Junction Connector are being proposed in anticipation of an estimated near doubling of rail traffic by 2035. Included in this rail traffic, which will travel through the city of Sandpoint and other communities in Bonner County, will be numerous trains carrying hazardous materials, coal, and crude oil. In 2016, three railroads in our county transported significantly more than 300,000 rail cars or tank cars containing various forms of hazardous materials and crude oil. And, as of 2017, approximately 24 unit trains per week carrying crude oil from the Bakken oil fields in the Dakotas and Saskatchewan travel

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through Sandpoint. This is significant given that in the spring of 2017, at least four significant derailments occurred in Bonner and Boundary Counties near waterways. Our community is interested in how BNSF's Sandpoint Junction Connector proposal and any potential increase in rail traffic, particularly hazardous materials and crude oil, will impact families and businesses in Sandpoint.

The U.S. Coast Guard (USCG) is the lead federal agency evaluating BNSF's Sandpoint Junction Connector proposal, and the USCG has the authority and obligation to implement the legal requirements pursuant to the National Environmental Policy Act (NEPA). In addition to NEPA, the USCG will also be evaluating BNSF's proposal according to its permitting authority pursuant to the General Bridge Act of 1946. The U.S. Army Corps of Engineers (USACE) is evaluating BNSF's proposal as a cooperating agency, and the USACE will evaluate the proposal according to its authority pursuant to Section 404 of the Clean Water Act.

BNSF's Sandpoint Junction Connector proposal is anticipated to cost over \$100 million, and construction of the project is estimated to last at least 3 years. Given estimates predicting that rail traffic will nearly double by 2035 and given the equipment, training, evacuation, procedural, and geographic vulnerabilities identified in the 2017 Lake Pend Oreille and Pend Oreille River Geographic Response Plan, our communities deserve an opportunity to understand the potential impacts of this proposal and anticipated increases in rail traffic. Among our concerns are:

- Safety concerns raised by the increased traffic congestion at crossings and the delay of emergency vehicles;
- Potential increased tax burden on local communities needing to improve crossings and prepare for potential spills, derailments and other emergencies. It is our understanding that railroads only contribute 5% of the cost when an at-grade crossing is replaced by an under or overpass.
- Potential issues caused by fugitive coal dust and/or diesel particulates that may contribute to public health impacts, derailments, and pollution of Idaho waters by coal falling from railcars;
- Neither the USCG nor the USACE has required BNSF to produce an Environmental Impact Statement pursuant to NEPA for its Sandpoint Junction Connector proposal. We are concerned that the USCG may authorize BNSF's proposal without considering the full scope of significant impacts to our communities.

As Mayor of Sandpoint, I urge:

1. The USCG to require BNSF Railway produce an Environmental Impact Statement analyzing the full scope of direct, indirect, and cumulative impacts the Sandpoint Junction Connector would have on our communities;

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2. The Surface Transportation Board to exercise its jurisdiction to ensure the cost of mitigating the impacts of trains carrying hazardous materials, crude oil, and coal do not fall on the local communities, other rail users and taxpayers; and
3. The Federal Railroad Administration to share its subject matter expertise on the relationship between rail safety and public/environmental safety with the USCG, the lead federal agency reviewing BNSF's Sandpoint Junction Connector Proposal.

Idaho families, communities and businesses are relying on these federal agencies to look out for our health and welfare in this local issue.

Thank you for your attention to our concerns.

Very Respectfully,

A handwritten signature in cursive script, appearing to read "Shelby Rognstad".

Shelby Rognstad
Mayor

Enc.