Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
3	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The Washington Research Council 2014 citation references a news article rather than the actual study by the Northwest Clean Air Agency. Further, when a reader attempts to find the study using the citation and hyperlink provided, the link to Northwest Clean Air Agency's website via the Washington Research Council website is broken.	Air Quality	The article was based on raw data that was temporarily posted to the NW Clean Air Agency's website. Jacobs obtained the raw data and emailed two NW Clean Air Agency staff separately who confirmed the statement that "Monitoring by the Northwest Clean Air Agency found no evidence of harmful air pollution levels in more than a year's worth of air sampling data that the agency collected between February 2012 and September 2013 in Bellingham at a rail crossing." The following two additional references have been added to the text and reference section of the EA: Northwest Clean Air Agency. 2019a. Email communication regarding air quality data. From Axel Franzmann, Atmospheric Measurement Manager. To Railin Santiago, Environmental Planner, Jacobs. April 25. Northwest Clean Air Agency. 2019b. Email communication regarding air quality data. From Gail King, Air Quality Compliance Coordinator. To Railin Santiago, Environmental Planner, Jacobs. April 24.
9	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	We also request that an estimate of the maximum annual average emissions expected for CO, NOx, SO2, PM2.5, PM10, VOCs, TSP, HAPS, and DPM from rail operations and construction along this rail corridor be provided to the public via the EIS framework.	Air Quality	No change in capacity is proposed and an operational pollutant study is not required. Because the Project is located within a PM_{10} maintenance area, an emissions study has been conducted to document that the Project meets conformity requirements. A summary of the analysis is provided in Section 3.1 for temporary conditions during construction.
48	Comment_Submitted_by_MattNykiel_IDConsvLeague2	There are also several unsubstantiated claims in this section [Air Quality] that we request the USCG provide citations or supporting evidence for including: "For example, Department of Energy data show that HD [heavy-duty] trucks produce almost 2.5 times the quantity of NOx [oxides of nitrogen] emissions as do railroads, but only account for 75 percent as many ton-miles of freight hauled."	Air Quality	A reference for the Department of Energy has been added to this location of the text and to the reference section.
1	Comment_Submitted_by_Anonymous2_Attachment1	While the distance over water for the current railroad bridge is 4,769 feet; the distance over water for a bridge over the Pend Oreille River is 1,095 feet, thus statistically reducing the chance of a toxic materials or oil spill by three-fourths.	Alternative to cross Pend Oreille River	An alternative considering development of alternate routes or shifting BNSF traffic to tracks owned by other railroads was considered in Section 2.1.2 of the Draft EA. This alternative is not considered socioeconomically or technically feasible and would have greater adverse impacts to the environment than the Proposed Action.
120	Comment_Submitted_by_HelenYost_WIRT3	BNSF could pursue north Idaho track and bridge expansion via other off-lake, downstream, less environmentally damaging, practicable, alternative track and bridge routes, designs, and options for this project, including routes as far downriver as Dover, Idaho and beyond.	Alternative to cross Pend Oreille River	See response to comment #1
42	Comment_Submitted_by_MattNykiel_IDConsvLeague2	if deteriorating rail service may cause shippers to convert consumer product containers to highway transportation by truck, then it is reasonable to conclude that the reverse is true as well – that adding rail service, through the addition of a second track for example, may cause shippers to convert from truck transportation to rail transportation. The USCG goes on to admit in these sections of the Draft EA that the desire for rail traffic is expected to increase, but the current bottleneck could prevent such increases, and the Connector would facilitate such increases.	Capacity	The conclusion linking increased rail congestion with increased truck traffic on local roads has been removed from the EA because trains that travel through Sandpoint serve a much broader geographic region for which there are numerous widely dispersed roadway options for truck transport. It is speculative to assume changes in freight shipment by rail would affect roadway traffic in Sandpoint due to associated changes in truck traffic. As clarified in Section 1.2 of the Final EA, this Project does not add any origin or destination facilities; therefore, it would not drive increases or decreases in rail traffic, but instead is designed to increase efficiency of movement by rail. The factors driving a continued increase in train traffic in the study area will exist with or without construction of a second main line track and associated bridges. Adding a second main line track along this segment would not increase capacity of the rail line because there are other constraints on the BNSF main line and MRL main line tracks to the east of LPO. The Idaho Department of Transportation projects an anticipated 143 percent increase in train traffic volumes on Idaho's railroad network by 2040 in the 2013 Idaho Statewide Rail Plan (ITD 2013).
69	Comment_Submitted_by_MattNykiel_IDConsvLeague2	Other double tracking projects have evaluated how the addition of a second rail track can affect rail capacity and traffic. In 2018, the FRA produced an EA discussing how the addition of 1.1 miles of a new second track near San Diego, California will change rail capacity and increase rail traffic. In that EA, the FRA determined that the proposed addition of a second track would increase train trips by 51 trips in 2030. Acknowledging that the proposed action would increase train trips, the FRA evaluated how increasing train traffic would impact other resources, including air quality and greenhouse gases. The USCG must provide this level of impacts analysis to the Connector, especially given the statements in the Draft EA indicating the Connector will facilitate likely increases in future rail traffic.	Capacity	According to the San Dieguito River Bridge Replacement, Double Track, and Del Mar Fairgrounds Special Events Platform Project EA, October 2014, a key component of the Project is to construct a special events platform at the Del Mar Fairgrounds for North County Transit District (NCTD) COASTER and Amtrak Pacific Surfliner trains. This adds a new train destination to the line in the form of a new passenger terminal. As acknowledged in the Sandpoint Junction Connector EA, new train origin and destination facilities would likely affect rail traffic volumes; however, the Sandpoint Junction Connector Project does not add any new train origin or destination facilities and would, therefore, not generate additional rail traffic.
70	Comment_Submitted_by_MattNykiel_IDConsvLeague2	USCG should use the NEPA Rail Transportation Technical Report associated with the Millennium Bulk Terminals-Longview NEPA EIS as a guide in collecting this data and conducting this analysis [for claims related to projected impacts to future rail traffic and vehicle wait times].	Capacity	As discussed in Section 1.2 of the Draft EA, the amount of freight moved by train is driven by market conditions and the number and type of freight origins and destinations along a rail line. This Project does not add any origin or destination facilities; therefore, it cannot predict increases or decreases in rail traffic, but instead is designed to increase efficiency of movement by rail. The factors driving a continued increase in train traffic in the study area will exist with or without construction of a second main line track and associated bridges. In contrast, the Millennium Bulk Terminals-Longview Project proposed a new coal export facility that would have served as a downstream driver for increased rail traffic.
74	Comment_Submitted_by_PrestonAndrews	The EA does not consider how projected increases in rail traffic in our area will increase the risk of derailments. According to the Idaho Statewide Rail Plan from 2013, train volumes on Idaho's network are projected to increase by 143% by 2040. According to data from the Federal Railroad Administration, BNSF had 286 derailments in 2018, with almost half of those derailments involving cars carrying hazardous materials (hazmat).	Capacity	See response to comment #42. As such, the Project is not expected to increase the potential for drailmnts to occur. A summary of accidents reported to the Federal Railroad Administration Office of Safety Analysis in the four-county area surrounding Sandpoint over the past 20 years has been added to Section 3.14 of the EA.
75	Comment_Submitted_by_ShelbyHerber	…the Sandpoint Junction Connector Project poses a major threat on the vitality of this enormous body of water if there were to be a derailment. According to the Idaho Statewide Rail Plan from 2013, train volumes on Idaho's network are projected to increase by 143% by 2040. However, the environmental review the Coast Guard just issued doesn't provide enough data or analysis to help me understand this risk.	Capacity	See response to comment #74
87	Comment_Submitted_by_Shelby_RognstadCityofSandpoint	While the EA asserts that the "project need is based on the limited ability of existing infrastructure to handle the continued growth of freight rail service demands in the BNSF northern tier"; it also asserts that the project "would not increase or change rail traffic volumes on BNSF's northern tier…" This type of contradictory language is found frequently throughout the EA and is used to both support the rational for the project while simultaneously dismissing impacts to the human, economic and environmental health.	Capacity	See response to comment #42
88	Comment_Submitted_by_Shelby_RognstadCityofSandpoint	The EA does not provide any numerical projections of train traffic volumes even though the severity of many impacts discussed inherently rely on this information. Instead, the EA either emphasizes the steady rise in rail traffic volumes over the past three decades or defers to market conditions as the factor most driving train traffic volume.	Capacity	See response to comment #42

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94	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	The EA does not consider how projected increases in rail traffic volumes in our area will increase the risk of a derailment. According to the Idaho Statewide Rail Plan from 2013, train volumes on Idaho's network are projected to increase by 143% by 2040. The EA states that the project "would not increase the amount of freight moved or rail miles traveled" and therefore would not increase the risk of a hazardous material spill, yet also states that "project need is based on the limited ability of existing infrastructure to handle the continued growth of freight rail service demands in the BNSF northern tier". Given the uncertainty regarding future train traffic volumes, it is premature to assume that the project would not facilitate an increase in the amount of freight moved. BNSF transports hazardous materials and a derailment of hazardous materials could have serious consequences to human and environmental health and our local economy. Projected train traffic volumes directly relate to an evaluation of spill risk and derailment.	Capacity	See response to comment #42
105	Comment_Submitted_by_Nancy_Schmidt	The EA states that the project "would not increase the amount of freight moved or rail miles traveled" and therefore would not increase the risk of a hazardous material spill, yet also states that "project need is based on the limited ability of existing infrastructure to handle the continued growth of freight rail service demands in the BNSF northern tier". Given uncertainty regarding future train traffic volumes, it is premature to assume that the project would not facilitate an increase in the amount of freight moved.	Capacity	See response to comment #42
110	Comment_Submitted_by_Nancy_Schmidt	While the EA asserts that the "project need is based on the limited ability of existing infrastructure to handle the continued growth of freight rail service demands in the BNSF northern tier"; it also asserts that the project "would not increase or change rail traffic volumes on BNSF's northern tier…"	Capacity	See response to comment #42
112	Comment_Submitted_by_Nancy_Schmidt	The EA does not provide any numerical projections of train traffic volumes even though the severity of many impacts discussed inherently rely on this information. Instead, the EA either emphasizes the steady rise in rail traffic volumes over the past three decades or defers to market conditions as the factor most driving train traffic volume.	Capacity	See response to comment #42
118	Comment_Submitted_by_David_Robinson	While the EA asserts that the "project need is based on the limited ability of existing infrastructure to handle the continued growth of freight rail service demands in the BNSF northern tier"; it also asserts that the project "would not increase or change rail traffic volumes on BNSF's northern tier…"	Capacity	See response to Comment #42
8	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	Please consider how projected increases in rail traffic volumes and associated increases in rail-related emissions would contribute to global climate change. This analysis is particularly important given the volume of fossil fuels moving via rail through the Sandpoint area to the coast for export. Please also consider how carbon emissions related to maintenance of the existing bridges and proposed bridges will contribute to global climate change. Finally, please compare these analyses with an analysis of carbon emissions under a No Action scenario.	Climate Change	There is no federal regulatory requirement to address climate change in a NEPA document. However, verbiage was added to Section 3.1 indicating that the Proposed Action Alternative would contribute to mitigating climate change as reduced bridge congestion and improved travel times would reduce total fuel consumption and thereby result in a corresponding decrease in all greenhouse gas emissions.
12	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	Please consider how projected decreased snowpack, increased temperatures, and increased variability in precipitation trends regionally, will change the hydrologic demands of LPO on the SVRP aquifer. The EA should consider how seasonal variability in precipitation and snow pack levels influences the demands on LPO to contribute to SVRP aquifer recharge	Climate Change	The way seasonal variation in snow pack, precipitation, and hydrologic demands affect the SVRP Aquifer are outside the scope of this EA. There is no pathway for the proposed project to affect weather patterns or aquifer recharge rates and none of the potential impacts related to the proposed project are correlated with such variation.
102	Phil Deutchman (verbal)	I would like consideration of climate change and global warming.	Climate Change	See response to #8. There is no federal regulatory requirement to address climate change in a NEPA document. However, verbiage was added to Section 3.1 indicating that the Proposed Action Alternative would contribute to mitigating climate change as reduced bridge congestion and improved travel times would reduce total fuel consumption and thereby result in a corresponding decrease in all greenhouse gas emissions.
4	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	"The Missoula City-County Health Department conducted an analysis of [particulate matter] PM along the rail line in 2012, and results showed no substantial findings of coal dust (Missoulian 2012)." The Missoulian 2012 citation references a news article, rather than the actual study that this statement refers to.	Coal Dust	Citation and reference to McCrone Associates. 2012. Letter from Mark A. Bukantis, Research Microscopist to Benjamin Schmidt, Air Quality Specialist, Missoula City-County Health Department, Re: Analysis of Dust Samples, McCrone Associates Project Number MA53061. June 14, 2012. added to the Final EA.
5	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	…we encourage USCG to consider Jaffe et al. 2015 who demonstrated that trains moving uncovered coal cars emit elevated particulate matter, directly impacting air quality. Please also consider the references cited within the Jaffe et al. study as further evidence that train-derived emissions should be considered before the Project moves forward. Jaffe, D., J. Putz, G. Hof, G. Hof, J. Hee, D. Lommers-Johnson, F. Gabela, J. Fry, B. Ayres, M. Kelp, and M. Minsk. 2015. "Diesel particulate matter and coal dust from trains in the Columbia River Gorge, Washington State, USA." Atmospheric Pollution Research. 6: 946-952.	Coal Dust	This study was referenced and discussed in the Millennium Bulk Terminals - Longview EIS, which is referenced by this EA. The Cowlitz County, WA field study conducted in support of the fugitive coal dust analysis described in the Millennium Bulk terminals - Longview EIS reported findings generally consistent with the maximum increase in the 2-minute average $PM_{2.5}$ concentration of 232 µg/m3 at 20 meters from the rail line observed during the passage of a single coal train traveling at 44.5 mph reported by the Jaffe et. al. 2015 study. The analysis of coal dust emissions from coal cars transported on the BNSF mainline at speeds of 40 - 45 mph for the Millennium Bulk Terminals - Longview EIS found that coal dust emissions would be below National Ambient Air Quality Standards concentrations for particulate matter, even considering background particulate matter levels. Coal trains travelling on the existing mainline track through Sandpoint and across LPO currently travel at 25 to 35 mph and would travel at no more than 35 mph on the new track and bridges under the Proposed Action Alternative. Slower train speeds would be expected to result in lower coal dust emissions consistent with this and other railroad based coal dust emissions studies.
49	Comment_Submitted_by_MattNykiel_IDConsvLeague2	There are also several unsubstantiated claims in this section [Air Quality] that we request the USCG provide citations or supporting evidence for, including: "The potential for coal dust emissions and/or particles falling off rail cars onto the track is greatest at the points of loading and unloading due to coal transfer at these locations." "The current use of load profiling and dust suppressants has been shown to achieve at least an 85 percent reduction in fugitive coal and allow only trace amounts to be lost during transit, which are amounts that are well below levels that could be harmful to human or ecological health as described above."	Coal Dust	Common logic supports the claim that the greatest potential for spills during normal operations occurs while materials are being handled as they are loaded or unloaded. The Surface Transportation Board (STB) has reviewed BNSF's Coal Loading Rule contained in Item 100 Coal Dust Mitigation Requirements of BNSF Price List 6041-B and the results of the BNSF/UP Coal Supertrial, which was a field study to collect data on the effectiveness of coal load profiling and dust suppressants, and agreed that minimization measures required by the Coal Loading Rule substantially reduce the emission of coal dust (STB 2013). The Coal Loading Rule requires all shippers loading coal at any Montana or Wyoming mine to load cars in such a way that ensures coal dust emissions in transit are reduced by at least 85 percent compared to cars where no remedial measures have been taken (BNSF 2017). Testing has shown that coal loaded in a rail car with an aerodynamic bread loaf shape and treated with an approved in-transit dust suppressant reduces coal dust emissions in transit by at least 85 percent compared to cars where no remedial measures have been taken (BNSF 2010).
51	Comment_Submitted_by_MattNykiel_IDConsvLeague2	Site-specific features of rail operations around Sandpoint like train speed, weather conditions, and distance from surfactant application facilities may cause more or less coal dust emissions compared to coal dust emissions studied in other locations along BNSF's rail line.	Coal Dust	See response to Item 5. Studies that have been conducted on particulate matter emission from passing coal trains travelling at different speeds and are cited in the EA in Section 3.1.1 of the EA. The Millennium Bulk terminals - Longview EIS, cited in Section 3.1.1 on the EA contained an analysis of coal trains travelling from mines in the Powder River Basin where dust suppression surfactant was applied to coal loads. These trains would have travelled through Idaho to Western Washington without the reapplication of surfactant in Pasco because the Pasco facility was not operational at the time of the analysis yet the results of the analysis found coal dust emissions to be below National Ambient Air Quality Standards concentrations for particulate matter, even considering background particulate matter levels.

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52	Comment_Submitted_by_MattNykiel_IDConsvLeague2	BNSF reapplies surfactant at a station in Pasco, Washington not long after coal trains pass through Idaho, which suggests dust-suppressing effects of the surfactant may weaken over time and distance. The USCG should analyze whether the surfactant continues to be effective at reducing coal dust emissions through Sandpoint, before surfactant is reapplied in Pasco, WA.	Coal Dust	The STB has reviewed BNSF's Coal Loading Rule contained in Item 100 Coal Dust Mitigation Requirements of BNSF Price List 6041-B and the results of the BNSF/UP Coal Supertrial, which was a field study to collect data on the effectiveness of coal load profiling and dust suppressants, and agreed that minimization measures required by the Coal Loading Rule substantially reduce the emission of coal dust (STB 2013). The Coal Loading Rule requires all shippers loading coal at any Montana or Wyoming mine to load cars in such a way that ensures coal dust emissions in transit are reduced by at least 85 percent compared to cars where no remedial measures have been taken (BNSF 2017). Testing has shown that coal loaded in a rail car with an aerodynamic bread loaf shape and treated with an approved in-transit dust suppressant reduces coal dust emissions in transit by at least 85 percent compared to cars where no remedial measures have been taken (BNSF 2010). Water rather than a chemical dust suppressant is sometimes used as a dust suppressant on coal trains in Canada. Unlike chemical suppressants, which bind coal particles together as they dry, water becomes less effective at suppressing dust as it dries. There is no need to reapply chemical dust suppressants, but BNSF constructed a coal re-spray center as a voluntary measure in response to a request from Canada's Port Metro Vancouver as part of its permitting process for coal export facilities located in British Columbia. The facility has been providing redundant application of dust suppressant to coal and petroleum coke cars since 2015.

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103	Steve Holt (verbal)	...a peer-reviewed study established in 2015 by Dr. Jaffe of the University of Washington, found that coal trains emit twice the airborne pollution as freight trains.	Coal Dust	See response to comment 5.
6	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	A more thorough analysis of the impacts of Project construction to the community and the environment is needed. Please provide the public with: • The expected amount of construction material that would be delivered to the Project site by vehicle and/or rail. • The expected number of vehicle trips to and from the Project site from daily worker commutes and from the transport of materials and supplies. • An analysis of the expected impact of increased vehicle trips to and from the Project site to humans, the local economy, and the environment. • An analysis of the expected impact of increased Project-related watercraft and barge use to humans, the economy, and the environment. • The number of barges and all other watercraft expected to be used, as well as the location and distance these craft will have traveled from, and where they will be launched from, as per the requirements of the Idaho Invasive Species Sticker program. • Clarification of schedule and duration of in-water construction activities. • Justification for the timing of in-water construction activities. • Analysis to support justification for not limiting Project construction to winter months. Why is Bridge 3.0 (proposed bridge over Bridge Street) not included in Construction Schedule and Design Year? • Does Table 3. Construction Equipment List, Use, and Reference maximum In-Air Noise Levels include equipment to be used for the construction of Bridge 3.0?	Construction	This information has been added to the EA in Sections 2.3 and 3.15. Table 3 includes all equipment anticipated to be used during construction.

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44	Comment_Submitted_by_MattNykiel_IDConsvLeague2	provide the level of detail needed to evaluate the short- and long-term impacts of the 3-5 year construction process for the Connector. We request the USCG provide a construction impact analysis, including but not limited to an analysis of the: □□Number of truck and worker vehicle trips per day; □□Number of barge and boat trips per day; □□Number of construction workers; □□Staging and parking locations of worker vehicles and construction equipment; □□Locations and expected level of use for all ingress and egress to the construction site; □□Public roads, pedestrian paths, parking lots, etc. that will be impacted by the construction; □□Anticipated refueling locations and expected frequency of use; and □□Times when construction will occur (please define “daylight hours”). Without disclosing and considering construction process operations in more detail, it is unclear how the USCG can evaluate the potential impacts for things like road traffic and parking shortages during construction of the Connector. Potential impacts on city and county services from construction traffic associated with the Connector are critical for a tourist- and events-based city like Sandpoint to understand. For example, summertime events in Sandpoint like the Fourth of July parade and fire works show and the “Back to the 50’s” classic car show attract hundreds of visitors, causing traffic congestion that BNSF’s construction process could further exacerbate. The Connector’s construction traffic and operations may also impact the only ingress and egress route that exists between the City of Sandpoint and Lake Pend Oreille lakeshore east of U.S. Highway 95. Construction traffic may impede the vehicle and foot traffic movement of visitors to City Beach, residents of the Seasons of Sandpoint Condominiums, or emergency responders. The Sandpoint community also is home to numerous outdoor music and film events, which warrants a more detailed evaluation of how things like construction timing and noise may impact these local economic drivers. Most notably Sandpoint hosts The Festival at Sandpoint every August, a week-long music festival staged at War Memorial Field, which is a local park in direct view and within earshot of BNSF’s existing rail bridge across Lake Pend Oreille. However, the Draft EA does not analyze the construction process for the Connector with the level of detail necessary to evaluate the potential impacts to concerts like The Festival.	Construction	This information has been added to Sections 2.3 and 3.15 of the EA.
38	Comment_Submitted_by_MattNykiel_IDConsvLeague2	…no mention in the draft EA of coordination between augmented, dangerously bi-directional, Lake Pend Oreille area, rail routes and traffic and BNSF-planned, rail unloading facilities for silicon, coal, wood, and other materials transportation to the proposed, HiTest Sand and PacWest, silicon smelter site in Newport, Washington, only 30 miles west of Sandpoint. BNSF and these companies produced a January 21, 2019, concept map of these Newport tracks, available through the Washington State Department of Ecology.	Cumulative Effects	The tracks that would serve the proposed PacWest silicon smelter are not located on BNSF, but rather are owned by a shortline railroad, Pend Oreille Valley Railroad (POVA). POVA has connections both to BNSF and Union Pacific in Dover, Idaho. These two projects are unrelated as BNSF first proposed the need for our Sandpoint Junction Connector long before the smelter was identified. Finally, but equally as important, the movement of any inbound and outbound rail movements would be determined by PacWest. The EA acknowledges that rail traffic has been increasing for the past 30 years and it is reasonable to expect that it will continue to do so. A discussion of this project identified as an example of the type of project that could contribute additional rail traffic to the system as the economy continues to grow has been added to Section 3.17 of the EA.
41	Comment_Submitted_by_MattNykiel_IDConsvLeague2	…the Connector, when considered along with other past, present, and reasonably foreseeable future actions has significant cumulative impacts. See 50 C.F.R. § 1508.27(b)(7). As we discuss in more detail below, the Connector is part of BNSF’s larger plan to double track throughout northern Idaho and eastern Washington to facilitate increasing volumes and frequencies of rail traffic throughout the BNSF northern tier rail line, as well as the MRL line. Cumulatively, these projects are filling critical wetland habitat in the Pacific Northwest, increasing the potential for rail disasters in rail line communities, and altering vehicle traffic at at-grade highway crossings.	Cumulative Effects	While BNSF continually plans to maintain and improve its network, only the Montana Division, Kootenai River Subdivision, Line Segment (LS) 45, MP 13.9 to MP 16.7 West Algoma to Cocolalla Double Track project currently under construction and scheduled for completion in the fall of 2019 is considered reasonably foreseeable. This project has been included in the cumulative effects discussion in Section 3.17 of the EA. BNSF has not scheduled or funded other system improvements although it has initiated permitting efforts in a proactive attempt to secure permits early to undertake a long lead time task and further inform the level of effort required in considering if and when the railroad may decide to pursue these projects.
43	Comment_Submitted_by_MattNykiel_IDConsvLeague2	BNSF is currently adding 2.8 miles of track along the shores of Lake Cocolalla, only 8 miles south of the Connector site.15 And, BNSF has plans in the works to double track between Hauser, Idaho and Spokane Valley, Washington, by adding another 4.4 miles of track.16 This project would be 42 miles south of the Connector site.	Cumulative Effects	See response to comment 41.
91	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	...at least three other major construction projects are proposed to occur during the project timeline. These include the Downtown Revitalization Project and various other city master planning efforts, construction to replace and repair buildings affected by the February 2019 downtown fire, and a proposed teardown and rebuild of the Best Western “Edgewater” Hotel.	Cumulative Effects	The cumulative effects analysis discussed in Section 3.17 of the Draft EA considers the North Ella Avenue Improvements, Oak Street Bike Path, Sidewalk, and Utilities Project, Sewer main and associated laterals replacement Along First Avenue, north of Church, and the Downtown Revitalization assuming activities over summer 2018 and 2019. The demolition and reconstruction of the Edgewater Resort and the reconstruction of the historic downtown buildings following the February, 2019 fire have been added to Section 3.17 of the EA pointing out that street use, road closures, and detours would be coordinated with the City.
15	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	In Appendix F, Table 4 indicates that bubble curtains will not be used to install temporary work bridge piles, even though the method described for installation is similar to the method proposed for installing piles for Bridges 3.1 and 3.9. We request the use of bubble curtains be added to temporary bridge installation methods when piles must be driven in water with a depth greater than 2 ft. Or, if this is not feasible, we request that reasonable justification be provided.	ESA/Bull Trout	The project is now proposing to utilize bubble curtains on the temporary work bridges when feasible.
16	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The BA states that, “The Project includes both vibratory and impact pile driving. High levels of underwater sound can injure or kill fish and cause alterations in behavior…” It is thus likely that bull trout individuals could be killed or “taken” as a direct result of the Project. While a “take” exception may be granted under ESA, the EA fails to provide evidence that the Proposed Alternative meets the necessary requirements, or any indication that this exception has been pursued or granted.	ESA/Bull Trout	As described under Section 5.1, coordination with USFWS has commenced and the project has received a Biological Opinion and authorized take which is included in an Appendix of the EA.

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17	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA fails to investigate the long term impacts of injury, mortality, and behavioral changes of bull trout individuals to the overall population as a direct result of construction activities.	ESA/Bull Trout	A full Biological Assessment (BA) has been written to address these items. USFWS has issued a Biological Opinion (BiOp) for the Project. The BA and BiOp have been discussed and added as appendices to the Final EA.
18	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA assumes, without supporting evidence, that the adverse impacts to individual and sub-adult bull trout, likely to occur in the project area, will not have an effect on the overall LPO bull trout population. The EA specifically states, "The Project is not expected to contribute to or exacerbate the defined existing threats to the bull trout population in the LPO-B core area…" This assumption is inappropriate given that, "Consultation with the USFWS regarding the Proposed Action Alternative, construction methods, Project timing, and impact minimization measures is ongoing." and also given that, "...there is minimal data on bull trout use of LPO within the Project action area (IDFG 2017b; USFWS 2017b)." Considering that neither a formal Biological Opinion nor a Letter of Concurrence (outcomes of consultation under Section 7 of the ESA) have been issued by USFWS, and that little information exists regarding the use of the Project areas by bull trout, this assumption does not appear to be supported by IDFG or USFWS.	ESA/Bull Trout	USFWS has issued a BiOp for the Project. The BiOp has been discussed and added as an appendix to the Final EA.
19	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA states, "A 2007-2008 study noted that an estimated population of 12,513 bull trout in LPO was similar to that estimated one decade earlier in 1997-1998, indicating a stable population (EA, Page 52)." Please provide a more recent LPO bull trout population estimate (i.e. 2017 or later).	ESA/Bull Trout	A more recent assessment has not been identified. Per Pete Rust (2019 email), the last LPO bull trout population assessment was in 2008.
20	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	We request that an analysis be performed, to identify the long-term population effects to bull trout that could result from the aforementioned direct and indirect noise effects.	ESA/Bull Trout	Long-term population effects are not expected to result from the project. The Section 7 process evaluates long-term population impacts and provides a statement as to whether the action will jeopardize the continued existence of the species. The USFWS has made the final determination on this matter in the BiOp.
21	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	Why are other behavioral changes (e.g., resting, predator-prey, predator-avoidance, foraging) not also considered, especially for fish that may exist within the distances of estimated PEAK or accumulated SEL exposure wherein onset of physical injury is expected?	ESA/Bull Trout	These behaviors are all covered under "disturbance thresholds" and "behavioral changes." Disturbance impact zones are discussed in Section 3.8.2.
22	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	It is not clear how the cumulative sound effects of two piles being driven at the same time to bull trout individuals was calculated in Appendix D of the Biological Assessment. Please clarify where this information exists, and provide this information for public review.	ESA/Bull Trout	To account for cumulative impacts to Bull Trout from two pile drivers working simultaneously, we doubled the number of pile strikes per day to 6,400, indicative of work occurring at both bridges and two pile drivers working simultaneously. Underwater sound exposure is best described cumulatively by "cumulative SEL". The assessment presented the cumulative SEL based on simultaneous piles being driven, and over-estimated the impact for each. In actuality, this SEL would only be where the aquatic impact zones overlap. The assessment provided worst-case scenario.
23	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The BA again references USFWS 2015b, Regional General Permit 27 for Lake Pend Oreille and Pend Oreille River to support the following statement, "…it is suggested that a minimum of 10 local populations are required for a bull trout core area (metapopulation) to function effectively, and core areas with more than 10 interconnected local populations are at diminished risk of extirpation. It is also estimated that approximately. 1,000 spawning adults within any bull trout population are necessary to ensure persistence of the population by maintaining genetic variation. The LPO core area has at least 20 local populations, and the IDFG has determined that approximately 4,000 adult spawning bull trout occupy LPO at any given time (USFWS 2015b)." After reviewing the referenced document, the quoted statement in the BA is unsupported by the reference document's text. We request that Jacobs (BA author) clarify where these suggestions and statements originated.	ESA/Bull Trout	In the BA, the reference should have been USFWS 2015c, not 2015b. The information is in the USFWS 2015 Columbia Headwaters Recovery Unit Implementation Plan for Bull Trout (Salvelinus confluentus).
24	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	Direct and indirect effects to kokanee individuals, resulting from Project construction and operation were not considered in the EA. Please study and report the potential effects.	ESA/Bull Trout	Kokanee is not a listed species in Bonner County. Non-ESA listed fish species are discussed in Section 3.7. There are no federal laws that specifically pertain to assessing impacts on non-ESA-listed/candidate species.
35	Comment_Submitted_by_DanielHaley_Attachment1	Several areas in this section (and in Section 3.17.1) indicate that additional studies and consultation are ongoing; this indicates that we do not yet have a complete picture of the impact to bull trout or the possible mitigating measures that could be taken. Therefore, it becomes quite clear that this Environmental Assessment is incomplete and any decisions using this EA must be deferred until a full assessment on the impacts to bull trout is completed.	ESA/Bull Trout	USFWS has issued a BiOp for the Project. The BiOp has been discussed and added as an appendix to the Final EA.
73	Comment_Submitted_by_MelissaFrolander_WIRT_Attachment1	Consider : Muck, Jim. 2010, BIOLOGICAL EFFECTS OF SEDIMENT ON BULL TROUT AND THEIR HABITAT – GUIDANCE FOR EVALUATING EFFECTS. U.S. Fish and Wildlife Service Washington Fish and Wildlife Office Lacey, WA	ESA/Bull Trout	The BA and the BiOp written by USFWS accounts for sediment impacts. The BiOp specifically attributes some of the take to construction related increases in turbidity.
108	Comment_Submitted_by_Nancy_Schmidt	Bull trout are Threatened under Endangered Species Act (ESA). The project area is located within bull trout critical habitat. No formal consultation with the U.S. Fish and Wildlife Service (USFWS) has been performed. USFWS is the lead agency in charge of implementing the ESA for freshwater species. The EA states that construction activities will adversely impact bull trout individuals, but fails to investigate adverse impacts of construction, rail operation, and the potential for a hazardous materials spill to the overall population. The EA doesn't take a hard look at the impacts to kokanee or other preferred prey species.	ESA/Bull Trout	USFWS has issued a BiOp for the Project. The BiOp has been discussed and added as an appendix to the Final EA.
36	Comment_Submitted_by_DanielHaley_Attachment1	It is likely that construction activities at Bridge 3.0 will impact public access to City Park and the Edgewater Report [Resort]. Please describe how traffic will be routed to ensure public access is not adversely restricted.	General Traffic	The construction contractor would be required to develop a traffic control plan compliant with ITD, Bonner County Road and Bridge, and Sandpoint Police Traffic Safety rules and requirements. The traffic control plan would propose transport of unique Project materials during nonpeak use times (such as nighttime) on US 95 and other public roadways. During construction of Bridge 3.0, temporary closures of Bridge Street may be required. If closures are required, the traffic control plan would include measures to minimize impacts to local homes and businesses that rely on Bridge Street as a primary access point. The traffic control plan would also identify emergency access routes, as needed. No permanent roadway closures are anticipated.
37	Comment_Submitted_by_DanielHaley_Attachment1	Please include the traffic control plan for the City Beach Park when Bridge Street is closed. Please include a quantitative assessment of how often the city beach access road will be closed. This feeds heavily into the socio-economic impacts of this project. Additionally, residents in the Seasons Condominiums and guests in the Best Western Hotel, as well as day users of the City Park and marina depend upon Bridge Street for emergency evacuation needs in the event of a rail accident in Sandpoint. It is imperative that Bridge Street remain open and relatively unimpeded during all phases of construction.	General Traffic	The traffic control plan would be developed once a construction contractor is selected. Please see response to comment 36.
57	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The USCG provides no reasonable basis to support the conclusion that rail congestion, as a result of not building the Connector, is likely to cause increases in truck traffic through Sandpoint. And, even if it can be confirmed that rail congestion will cause shippers to convert rail freight to highway truck transportation, the USCG provides no analysis of the freight origins and destinations or the highway routes most likely to be used by this freight, which would reasonably support the conclusion that truck traffic would come through Sandpoint.	General Traffic	The conclusion linking increased rail congestion with increased truck traffic on local roads has been removed from the EA because trains that travel through Sandpoint serve a much broader geographic region for which there are numerous roadway options for truck transport. It is speculative to assume changes is freight shipment by rail would affect roadway traffic in Sandpoint due to associated changes in truck traffic.

Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
86	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	What type and volume of traffic would be created by the proposed project? What additional delays would occur on our local streets? How specifically would the applicant mitigate these impacts?	General Traffic	Section 3.15 of the EA has been updated to include estimates of daily truck trips, construction worker commute trips, and an explanation of how potential effects resulting from this additional traffic and road closures due to construction would be minimized through agency coordination and the development of a traffic control plan.
101	Matt Nykiel (verbal)	...construction from a project that could last three to five years could have impacts from truck traffic, vehicle traffic, equipment traffic, parking issues with where BNSF may put that sort of traffic, and it can increase delays to the community, it can dissuade tourists and visitors from stopping because of noise impacts....without a more thorough analysis of vehicle trips per day, anticipated refueling locations, public roads and pedestrian paths, parking lots that might be used, we really can't tell what the impacts might be.	General Traffic	See response to comment # 86. Construction related parking and construction equipment refueling would occur within BNSF right-of-way. Potential noise Impacts are discussed in Section 3.13 of the EA and potential socioeconomic impacts are discussed in Section 3.0 of the EA and a new socioeconomics technical memorandum that has been added as Appendix H.
14	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	According to the EA, the removal of several large trees along the existing track is scheduled to occur. Would the removal of these trees negatively impact Bald Eagles and other large predatory birds that are frequently observed using these trees? If so, have mitigation measures been identified?	Migratory Birds/USFWS Issues	As stated in Sections 3.7 and 4.1 of the EA, a migratory bird nesting survey would be conducted at the beginning of the season, within the study area, prior to ground-disturbing activities. If a nest is identified, a plan for impact minimization would be established with the necessary agencies.
34	Comment_Submitted_by_DanielHaley_Attachment1	3.7.1 Birds. Page 47, last paragraph this section regarding bald eagle roosts. The statement provided is inaccurate. Bald eagles are routinely sited roosting in this area.	Migratory Birds/USFWS Issues	The EA considers that bald eagles may nest or roost in the study area even though there no official records or direct observation of nesting or roosting activity has been identified. Section 3.7.1 of the EA lists bald eagles among the species of birds that have been observed in Bonner County and may occur in the study area. The specific statement this comment refers to summarizes the finding of database records search and field review for documented or directly observed bald eagle roosts in the study area. The EA further includes an avoidance and minimization measure in Section 4.1 associated with potential related impacts: "A migratory bird nesting survey would be conducted at the beginning of the season, within the study area, prior to ground-disturbing activities. If a nest is identified, a plan for impact minimization would be established with the necessary agencies."
40	Comment_Submitted_by_JaneFritz	Another impact from this proposed project that was not included in the EA was impacts to nesting osprey and bald eagles in that area.	Migratory Birds/USFWS Issues	Potential impacts to nesting migratory birds, including osprey and bald eagles along with and appropriate avoidance and minimization measure are discussed in Sections 3.7 and 4.1 of the EA.
55	Comment_Submitted_by_MattNykiel_IDConsvLeague2	At page 47, the Draft EA states: "A database search and field review were conducted to determine whether bald and golden eagle nests and/or communal roosts occur in the study area. The review concluded that no nests and/or communal roosts are located in the area." We request the USCG explain what database was searched and when, as well as explain who conducted the field review and when? We also request the USCG cite the field review and make it publicly available, if it is not already.	Migratory Birds/USFWS Issues	Additional language has been added to section 3.7.1 to describe the databases and methodologies used.
2	Comment_Submitted_by_Anonymous2_Attachment1	The Navigational risks are significant, since the piers for the old bridges and new bridges do not align (Appendix A, Sheets 8 & 9; EA hard copy p. 20). Boaters navigating between the piers supporting the new bridge would, within 50 feet, encounter directly in their path a pier supporting the old bridge (3.9). In addition, there is no information in the EA about how the piers under the work bridges would align with the other two bridges; this may further endanger boaters and fishermen during construction.	Navigation	As stated in Section 3.11 of the EA, Prior to the construction of the Proposed Action Alternatively, the USCG would review potential temporary and permanent changes to navigation as part of the bridge permit process, including solicitation and consideration of public comments . As stated in the USCG public notice for the second public comment period on the Draft EA and in a letter from USCG to BNSF (PN 03-19; USCG 2019), USCG has reviewed a Bridge Permit application and has concluded that the Proposed Action Alternative would meet the reasonable needs of navigation. Comments related to this will be handled outside the NEPA process as part of the bridge permit application process. In addition, IDL considered potential effects to navigation on LPO before issuing the encroachment permit. USCG would complete review of a Bridge Permit application.
76	Comment_Submitted_by_SueKoller_WIRT-1	The USCG does not offer diagrams and descriptions of the temporary, work bridges over Sand Creek and Lake Pend Oreille, which reduce most of the horizontal, navigational clearances of both spans and create additional impediments and wave turbulence for navigation around the piers of three bridges over each water body during the construction period.	Navigation	See response to comment #2. The piers from the proposed bridges, and the temporary work bridges needed to construct them, will have a negligible impact on water levels and flow velocities in the vicinity of the piers. The existing water velocity in the vicinity of Bridge 3.9 and Bridge 3.1 are relatively low. The velocity peaks at 1.71 ft/s (1.01 Knots) at Bridge 3.9 and 2.51 ft/s (1.48 Knots) at Bridge 3.1. Hydraulic modeling of the proposed bridge 3.9, over LPO, examined 29 locations along the lake at 17 different flow events ranging from 10,000 cfs to 159,000 cfs (Hanson Professional Services, 3/29/2019). Water levels are predicted to be unchanged at every location and at every flow event modelled, while water velocity is predicted to be reduced by 0.01 ft/s at seven of the 357 location and flow combinations. Given the broad span and the lack of impact of the proposed bridge, the temporary bridge over LPO is also unlikely to have a noticeable impact to water level or velocity. Similarly, proposed Bridge 3.1, over Sand Creek, was assessed at 17 locations, and at four different flow events (10-year, 50-year, 100-year and 500-year), with no predicted change in water level, and a reduction in flow velocity of 0.01 ft/s at four of the 204 location and flow combinations (Hanson Professional Services, 11/13/2018). The temporary bridge over the navigation span at Sand Creek will only be in place when navigational access up Sand Creek is unavailable due to winter low pool conditions correlated with operations at Albeni Falls Dam, further reducing the potential impact of the temporary bridge on navigation on Sand Creek. Existing water velocities at both bridge locations are sufficient to mobilize fine lake bottom sediments. The negligible reduction in water velocity predicted by the model as a result of the Proposed Action is not likely to have a noticeable effect on overall sediment movement under the bridges, or result in sediment build-up. There may be small localized effects to the lake bottom in the immediate vicinity of each pile, but these effects will not substantially change existing sediment transport dynamics. Water velocity under the bridges may cause localized turbulence around the proposed piles. Given the low velocities, this turbulence will be relatively minor, and likely less than that produced by the larger existing bridge piers. These localized areas of minor turbulence are not expected to increase wave heights or pose a substantial navigation hazard, even considering small, lightweight, human powered watercraft.
77	Comment_Submitted_by_SueKoller_WIRT-1	The USCG does not offer the 35 pages of navigational analyses supplied by BNSF as three addenda to its joint application, referenced by Idaho Land Board, May 23, 2018…	Navigation	See response to comment #2.
78	Comment_Submitted_by_SueKoller_WIRT-1	The USCG does not state that bridge construction will entail “year-round, in-water work,” and that the “the project will occur over an approximate 3- to 3.5-year time period,” thus impacting navigation under and around the Sand Creek and Lake Pend Oreille bridges for perhaps up to five years…	Navigation	See response to comment #2. Clarification of in-water construction timing added to Section 2.3.5 of the EA.

Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
79	Comment_Submitted_by_SueKoller_WIRT-1	Installing and removing up to 1000 piles in Lake Pend Oreille and almost 50 piles in Sand Creek, close to its outlet into the lake and nearby marinas in the creek and lake, for permanent, railroad and temporary, construction bridges, can only significantly, adversely, and cumulatively impact the freedom of navigation that the public trusts the U.S. Coast Guard to uphold and protect. Some of these effects include heightened hazards to boaters from bridge-altered current, wave, and flooding patterns, from blocked, small watercraft navigation channels under and around bridges, from lost recreational opportunities and investments during the years-long, bridge construction period, and from construction bridges and activities, about which the Coast Guard has not supplied enough public information for this comment period.	Navigation	See response to comment #2.
81	Comment_Submitted_by_SueKoller_WIRT-1	Lake currents more obstructed by a greater number of piers, as well as sediment deposition and heightened lake beds west of the railroad bridges, would cause more turbulent wave action around and downstream of railroad bridge piers, making navigation more difficult, especially in lightweight, human-powered watercraft that float closer to surface waters and more vulnerable to wave inundation.	Navigation	See response to comment #76.
82	Comment_Submitted_by_SueKoller_WIRT-1	In Sand Creek, small, non-motorized watercraft, like canoes, kayaks, and paddleboards, often navigate the stream passages closest to shore, to avoid the existing, BNSF, and U.S. Highway 95 bridge piers and the wakes, noise, pollution, and possible collisions with larger watercraft in the main navigational channel. The uneven and confusing constriction of horizontal, navigation clearances among the piers of four Sand Creek bridges (current and new rail bridges, temporary construction span, and Highway 95 bridge) would complicate potentially dangerous, navigational encounters between motorized and human-powered boats. As previously mentioned herein, in WIRT “Missing Information” comments, the USCG has not provided sufficient, bridge expansion project plans, diagrams, and maps for the public to knowledgably comment on the navigation impacts of this four-bridge configuration.	Navigation	See response to comment #2.
56	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The Draft EA notes at page 67 that the U.S. Environmental Protection Agency and Secretary of Transportation set these [noise] levels, but the Draft EA fails to explain what they are or where they can be reviewed. Similarly, the Draft EA failed to provide or explain the noise limits set by the Federal Rail Administration for railroad equipment. We request the USCG provide this information too, or at least a citation to what is referred to in the Draft EA.	Noise	The discussion of noise in Section 3.13 of the EA has been extensively rewritten and now cites the relevant references to federal law.
58	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The Draft EA did not provide the maximum in-air noise levels of idling trains and drive-through trains, nor did the Draft EA evaluate how expected rail traffic increases associated with the Connector will affect drive-through train noise.	Noise	As indicated in the response to comment #70, an increase in train traffic volumes is not anticipated as a result of the Proposed Action. An analysis of noise levels from idling vs. drive-through trains was not conducted. However, the operational noise section of the EA was reivsed to clarify that an increase in speed from 25 mph to 35 mph for freight trains and 35 mph to 40 mph for passenger trains may result in an increase of 2 dBA Ldn. It is generally accepted that the average healthy ear can barely perceive a noise level change of 3 dBA (FHWA 2011).
59	Comment_Submitted_by_MattNykiel_IDConsvLeague2	Several claims and determinations made at page 68 of the Draft EA that are not substantiated by the USCG. For example, the Draft EA states that 3 dBA were added to the noise level of two impact hammers operating at once, but the USCG provided no reasonable basis of support for this decision. It is also unclear on what basis the USCG concluded that locomotive horn/whistles are appropriately considered part of the ambient noise within the study area. These determinations affect the outcome of the USCG’s impact analysis, so it is important the USCG clearly explain and provide the information necessary to understand its analytical approach.	Noise	The Noise section of the Final EA has been substantially rewritten for clarity. The methodology for calculating noise levels during use of two impact hammers is based on the WSDOT guidance for preparation of BAs. This is documented in Section 3.7.2 under "Noise Impacts within the Action Area." As acknowledged in the updated Noise section, Train horns are required to produce sound levels between 96 and 110 dBA at 100 feet forward of the locomotive (49 CFR 229.129). Trains are required to sound their horns as they approach public at-grade crossings (49 CFR 222.21). Trains may also sound their horns at other times, such as when there is a vehicle, person, or animal on or near the track and the crew determines it is appropriate to provide warning. Distant train horns sounded on BNSF and other railroad lines can be heard in the study area, but no at-grade crossings exist within the study area. Noise measurements within the study area were not taken as part of the noise analysis; however, estimated sound levels for traffic on adjacent US 95 are documented in the EA.
92	Comment_Submitted_by_Shelby_RognstadCityofSandpoint	Section 2.3.4 of the EA indicates that the maximum decibel readings of impact pile driving is 110 dBA as measured from fifty feet away. A total of 64 piles would be placed to support the new Sand Creek Bridge, 22 of which would be below the ordinary high water mark (OHWM) and driven during winter pool elevation. The EA also states that there is an average of 1,200 impact hammer strikes per pile. An analysis of potential impacts to surrounding businesses should be conducted in order to assess economic impacts from potential loss of customer traffic due to noise levels and what mitigation should occur.	Noise	A Socioeconomic Analysis was prepared and is included as Appendix H to the Final EA. As indicated in Section 3.2.3 of the report, the nearby Edgewater Resort may suffer some loss of patrons due to the increased noise and views of the work in close proximity to boat docks and picnic area. However, the resort is scheduled for demolition and reconstruction starting in September 2020 and will be closed for 14 to 16 months to accommodate this work. No other businesses are expected to suffer financial losses as a result of project construction.
96	Comment_Submitted_by_Shelby_RognstadCityofSandpoint	The EA fails to acknowledge noise pollution originating from train whistles that are activated when a train passes through an at-grade crossing. Since most crossings in Sandpoint are at-grade, and there are no plans for grade separation, it’s important to understand how noise could be impacted with increasing train volumes.	Noise	See response to comments #58 and #59. An increase in train traffic volumes is not anticipated as a result of the Proposed Action.
13	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	EA Page 41, paragraph 1, line 7 refers to Bridge 3.6. As there is no other reference to a Bridge 3.6 in the EA, please clarify whether this was an error and confirm that the authors were instead referring to Bridge 3.9.	Other	Bridge 3.9 was incorrectly referred to as Bridge 3.6. This typo has been corrected.
45	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The USCG should expand the study area to capture the local, regional, national, and international impacts that, as the USCG and BNSF admit, will result from construction of the Connector. The USCG does not explain how and why it limited the study area in the Draft EA to the BNSF Right of Way from mile post 2.9 to mile post 5.1, given the wide-ranging impacts suggested by the Draft EA and by BNSF’s own statements.	Other	In the introduction to Section 3.0 of the EA, Affected Environment and Environmental Consequences, it is stated that: "Unless otherwise noted by resource, the study area for this EA is the BNSF ROW from MP 2.9 to MP 5.1 and varies between 100 and 400 feet wide, extending from 50 to 200 feet on either side of the track centerline." The study area for each resource type potentially impacted is further defined based on the range of those potential impacts in the Affected Environment discussions under each subsection of Section 3 of the EA.
50	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The USCG accepted, without independently evaluating, claims provided in the “BNSF Price List 6041-B, Item 100, Coal Dust Mitigation Requirements” and the “Summary BNSF/UP Super Trial 2010,” reports led and funded by BNSF, the applicant in this case.	Other	The STB has reviewed BNSF’s Coal Loading Rule contained in Item 100 Coal Dust Mitigation Requirements of BNSF Price List 6041-B and the results of the BNSF/UP Coal Supertrial, which was a field study to collect data on the effectiveness of coal load profiling and dust suppressants, and agreed that minimization measures required by the Coal Loading Rule substantially reduce the emission of coal dust (STB 2013). This statement has been added to Section 3.1.1 of the EA.
54	Comment_Submitted_by_MattNykiel_IDConsvLeague2	…the Draft EA does not evaluate impacts from BNSF’s in-water work that may increase the spread of invasive aquatic species like flowering rush. Flowering rush (Butomus umbellatus) is established and expanding throughout the shoreline area of BNSF’s right-of-way near City Beach and Dog Beach. Because this invasive species spreads rapidly through rhizome fragmentation BNSF’s dredge and fill work for the Connector may exacerbate the spread of flowering rush in Lake Pend Oreille.	other	Dredging is not anticipated as part of this project. The placement of fill or other in-water work is not anticipated to fragment and mobilize flowering rush (Butomus umbellatus) rhizomes as no bulk sediment disturbance is anticipated.
80	Comment_Submitted_by_SueKoller_WIRT-1	Over time, Lake Pend Oreille sediment displaced around the existing and additional bridge piers, from both the downstream flow of lake outlet waters narrowing into the Pend Oreille River and temporary, lakebed sediment re- suspension during bridge construction activities, would alter lake bed topography around bridge piers, and raise the lake bed and reduce navigable lake depth down-current of railroad and associated construction bridges. This dynamic is apparent in sand bars that have formed and emerge during low water west of the BNSF bridge, and in the lake bed topographical maps included in the BNSF joint application	Other	Existing water velocities at both bridge locations are sufficient to mobilize fine lake bottom sediments. The negligible reduction in water velocity predicted by modeling as a result of the Proposed Action is not likely to have a noticeable effect on overall sediment movement under the bridges, or result in sediment build-up. There may be small localized effects to the lake bottom in the immediate vicinity of each pile, but these effects will not substantially change existing sediment transport dynamics. In addition, sediment curtains would be used to contain sediments resuspended during pile driving. Those sediments would be expected to resettle close to their predisturbance location.

Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
32	Comment_Submitted_by_DanielHaley_Attachment1	The proposed action indicates that the new track will be west of the existing track, which will place the new track extremely close to the existing and newly remodeled Amtrak station. Nowhere in this document is a description of the impacts to this facility. Will the station need to be removed? Will the continual vibration of massive trains adversely harm the station? How will the safety of rail passengers be affected?	Safety	A Vibration Assessment was completed to evaluate the potential for structural damage to the Amtrak Depot. The assessment is included as new Appendix K to the Final EA. The assessment concluded that the potential for damage due to operation of freight trains at speeds up 35 mph on the new main line track is very low.
114	Comment_Submitted_by_Nancy_Schmidt	The EA also states that implementation of the Proposed Action Alternative "would result in multiple safety benefits for …emergency response providers…associated with reduced train and vehicle congestion and wait times at grade crossings" again without any corroborating evidence.	Safety	Se response to comment 30.
10	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	We request a sediment metals analysis be performed in the project area where sediments are expected to be suspended into the water column due to construction-related activities. We request that, at minimum, metals that were identified in high concentrations in the 2014 GeoEngineers survey be included in this analysis.	Sediment Contamination	Discussion has been added to Section 3.14 to explain the limited potential for LPO sediments in the Project Area to be contaminated. Section 3.2, 3.3, and 3.14 explain the measures that would be taken to contain re-suspended sediments and the limited potential for potential sediment contamination to result in adverse environmental impacts. No sediment sampling is warranted.
67	Comment_Submitted_by_MattNykiel_IDConsvLeague2	USCG should conduct a sediment analysis to determine if unrecorded releases of contaminants have accumulated in the soils over the rail bridge's 120 years of operations. Neglecting to evaluate these impacts is especially concerning, given that it is unclear in the Draft EA whether BNSF or its contractors have testing methods and procedures sufficient to identify soil contamination and limit the impacts of potential releases during the construction process.	Sediment Contamination	See response to comment 10.
97	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	The EA does not consider what metals or other contaminants exist in sediments within the project area or their concentrations. Sediments will become mobilized during construction (i.e. pile driving), especially when turbidity curtains are not required (water level > 3 ft.). If sediments contain metals, those metals could also move into the water column and could be available to source drinking water intakes and aquatic life.	Sediment Contamination	Discussion has been added to Section 3.14 to explain the limited potential for LPO sediments in the Project Area to be contaminated. Section 3.2, 3.3, and 3.14 explain the measures that would be taken to contain re-suspended sediments and the limited potential for potential sediment contamination to result in adverse environmental impacts. The potential for the resuspension of potentially contaminated sediments to contaminate surface water of groundwater drinking water sources is discussed in Section 3.3.
100	Marilyn Robertson (verbal)	Although the construction sites are not near the inflow of the Clark Fork, do we know whether the lake bed sediments in the construction zones have also eventually received high levels of mercury and trace metals?· Because these sediments would be disturbed during construction, this is another question that should be researched by an EIS.	Sediment Contamination	See response to comment #10
109	Comment_Submitted_by_Nancy_Schmidt	Lake Pend Oreille and Sand Creek are listed by the State as water quality impaired due to mercury (from fish tissue analyses). However, the source of mercury to the lake and sediment concentrations are unknown. According to the EA, other heavy metals including cadmium, copper, and zinc exist in the sediments at Clark Fork Delta. The EA does not consider what metals or other contaminants exist in sediments within the project area or their concentrations. Sediments will become mobilized during construction (i.e. pile driving), especially when turbidity curtains are not required (water level > 3 ft.). If sediments contain metals, those metals could also move into the water column and could be available to source drinking water intakes and aquatic life.	Sediment Contamination	See response to comment 97.
7	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA states, "Businesses within the Sandpoint area would temporarily benefit from an influx in economic activity during construction. Therefore, socioeconomic impacts would be minimal or beneficial and are not discussed further…" However, this statement is not supported with any prior analysis or information. Please clarify how the EA authors arrived at the conclusion that businesses will receive a net benefit from the Project.	Socioeconomics	A Socioeconomic Analysis was prepared to address better substantiate this conclusion and is included as Appendix H to the Final EA. The results of the analysis are summarized in Section 3.10 of the Final EA, which has been renamed "Socioeconomics and Environmental Justice."
31	Comment_Submitted_by_CityofDover_Dover_Idaho	…we are requesting information on the estimated number of workers who will temporarily move into this area during the term of the project, the estimated number of family members, expected number of students enrolling in our school systems, the type of housing needs, what the plans are for how and where workers will be housed, what the impact estimates are for usage of community services such as health care and food services. This is a small community with a limited supply of rental properties, services and service workers.	Socioeconomics	See response to comment 7.
33	Comment_Submitted_by_DanielHaley_Attachment1	If the Sandcreek bridge is constructed during the summer boating season, then the Sandcreek Marina will likely be inaccessible. The EA document needs to assess the negative economic impact of dozens of boaters not being able to use the marina. Losses to local businesses could be significant. The construction schedule depicted in Section 2.3.5 is inadequate to assess the impact to marina users.	Socioeconomics	As stated in Section 2.3.1 of the Draft EA: "The temporary work bridge span over the Sand Creek marked and lighted navigation channel would be limited to the period when no navigational access up Sand Creek is available, from approximately October 15 to April 15, depending on Albeni Falls Dam fall drawdown and spring fill. The temporary work bridge span over the marked and lighted navigation channel for Sand Creek would be removed between April 15 and October 15. As a result, the temporary work bridge would not impact navigation for marine traffic in Sand Creek as it would not be an obstruction when navigational access up Sand Creek is available." and "Piles within the main channel of Sand Creek would be driven during low-water conditions/winter pool elevation."
46	Comment_Submitted_by_MattNykiel_IDConsvLeague2	USCG inappropriately eliminated socioeconomic impacts from further review based on the conclusion that the Connector's impacts on socioeconomics would be "minimal or beneficial." The Draft EA fails to identify any reasonable basis for making this conclusion.	Socioeconomics	See response to comment 7.
89	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	The EA eliminated socioeconomic impacts from review based on assumed "minimal or no effect." Without citing any evidence, the EA asserts that the project would not impact businesses in the Sandpoint area. It also asserts that businesses within Sandpoint would temporarily "benefit from the influx of economic activity during construction", yet no study of economic impacts is referenced.	Socioeconomics	See response to comment 7.
90	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	The City of Sandpoint has a limited supply of both short-term and long-term housing stock. Should a large influx of workers be located within the Sandpoint area, a study should be conducted detailing housing needs and ways to mitigate impacts to housing supply. Specifically, the impacts on housing from the 3-5 year construction window should be studied in relation to seasonal short term housing needs by the tourism sector and the long-term workforce housing needs of local employers.	Socioeconomics	See response to comment 31.
107	Comment_Submitted_by_Nancy_Schmidt	The EA does not consider all potential socioeconomic costs, benefits, or cumulative effects (e.g., noise pollution from construction and existing train traffic) to rail side communities. (e.g., traffic management measures, including an option to separate grades at rail crossings in rail side communities were dismissed by BNSF); (e.g., in Sandpoint, at least three other major construction projects are proposed to occur during the project timeline. These include the City of Sandpoint (COS) Downtown Revitalization Project and various other COS master planning efforts, construction to replace and repair buildings affected by the February 2019 downtown fire, and a proposed Best Western remodel). The EA disregards the need for a comprehensive analysis by making claims about socioeconomic effects that are not backed by relevant studies or reports.	Socioeconomics	See response to comment 7. Additional verbiage was added to Section 3.17.1 of the Final EA to address potential cumulative effects of overlapping local construction projects. BNSF is coordinating with the City of Sandpoint Public Works Department to minimize potential disturbances to the local community. Additional noise and socioeconomic avoidance and minimization measures have been added to Section 4.1 to reflect those coordination efforts.

Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
111	Comment_Submitted_by_Nancy_Schmidt	The EA eliminated socioeconomic impacts from review based on assumed “minimal or no effect.” Without citing any evidence, the EA asserts that the project would not impact businesses in the Sandpoint area. It also asserts that businesses within Sandpoint would temporarily “benefit from the influx of economic activity during construction”, yet no study of economic impacts is referenced.	Socioeconomics	See response to comment 7.
117	Comment_Submitted_by_David_Robinson	The EA does not consider all potential socioeconomic costs, benefits, or cumulative effects (e.g., noise pollution from construction and existing train traffic to rail side communities) (e.g., in Sandpoint, at least three other major construction projects are proposed to occur during the project timeline. These include the City of Sandpoint (COS) Downtown Revitalization Project and various other COS master planning efforts, construction to replace and repair buildings affected by the February 2019 downtown fire, and a proposed Best Western remodel).	Socioeconomics	See response to Comments #91 and #107
119	Comment_Submitted_by_David_Robinson	The EA eliminated socioeconomic impacts from review based on assumed “minimal or no effect.” Without citing any evidence, the EA asserts that the project would not impact businesses in the Sandpoint area. It also asserts that businesses within Sandpoint would temporarily “benefit from the influx of economic activity during construction”, yet no study of economic impacts is referenced.	Socioeconomics	See response to Comment #111
25	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	Please confirm whether the term, “accident” includes derailment and spills.	Spills/Spill Response/ Derailments	The term "accident" as used in the Draft EA includes derailments. Spills are specifically mentioned where they are included in the discussion.
26	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	If train traffic is expected to increase given the quote above, why is rail traffic increase not included in an analysis of accident risk?	Spills/Spill Response/ Derailments	See response to comment #42
27	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	To our knowledge, there exists no response or cleanup strategy for spills involving petroleum products that sink, or other hazardous materials listed in the document (e.g., allyl bromide, ammonium nitrate, sulfuric acid, hydrochloric acid, methanol, and alcohols not otherwise specified), which make up the remaining 47.5% of total hazardous material rail shipments in Bonner County per year (GRP, page 26). Given the dynamic and dangerous nature of these materials, it is critical that USCG address deficiencies in responding to incidents involving these materials before moving forward.	Spills/Spill Response/ Derailments	As indicated in Section 3.14 of the EA, USDOT requirements for prevention, containment, and response planning for transportation of oil by rail car is identified in 49 CFR 130. The only commodity-specific plan required by USDOT is an oil response plan. Risk is based on volume, and the volumes of other commodities transported by rail are so low that they don't warrant (nor does USDOT require) a commodity-specific response plan. However, BNSF has response capabilities to address all commodities.
28	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA states that Dog Beach access will be unavailable during Project construction (3-5 years). In the event that a derailment occurs and emergency response is required, what alternative location(s) do emergency personnel plan to utilize?	Spills/Spill Response/ Derailments	In the event that the area commonly known as Dog Beach is unavailable during an emergence response, that response would be executed consistent with response plans as described in Section 3.14 of the EA where access is limited such as during low water and no water access during low pool elevations, including access during winter months with icy conditions and may require air boat usage. BNSF and the County OEM have purchased an air boat that is staged at the Sandpoint Station of the Selkirk Fire Rescue & EMS Department. During limited access conditions, equipment could also be delivered using high-flotation, wheeled vehicles; these air boats; and/or helicopters.
29	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The GRP also does not provide emergency response time estimates from boat ramps during winter months. Nor does it indicate response measures or times under inclement weather, icy conditions, or high flow scenarios.	Spills/Spill Response/ Derailments	Section 3.14 of the EA acknowledges that emergency response may be more complicated during winter months and presents alternate strategies for mobilizing a response during adverse conditions: "Boat access to LPO can be acquired from at least 35 boat ramps along LPO, the Clark Fork River, and the Pend Oreille River. Most of these boat ramps are unusable below a lake elevation of 2,056 feet, a level that can occur between mid-October and mid-May. Two boat ramps located at Priest River and Hope Basin offer reliable year-round response deployment; however, response time from those sites to an accident location may be complicated by wind, weather, and ice. Additionally, the shoreline area within BNSF ROW at the north end of Bridge 3.9 (the area commonly known as “Dog Beach”) could be used to launch small boats during emergency events. Low water and no water access during low pool elevations, including access during winter months with icy conditions, may require air boat usage. BNSF and the County OEM are planning to purchase air boats in 2019 that will be staged within the LPO region. During low pool elevations, equipment could also be delivered using high-flotation, wheeled vehicles; these air boats; and/or helicopters." Specific response times would likely vary based on specific weather and/or flow conditions.
53	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The Draft EA also fails to consider the unique impacts of hazardous or toxic materials that sink in water. At page 35, the Draft EA states that BNSF would implement the Lake Pend Oreille Geographic Response Plan to respond to a spill. However, this response plan does not address materials or contaminants that sink in water. Allyl bromide comprises 2.5% of the total hazardous materials transported by rail in Bonner County, and allyl bromide has a specific gravity greater than 1, meaning it will sink in water. As mentioned above, BNSF also transports diluted bitumens, which can sink in water as well.	Spills/Spill Response/ Derailments	See response to comment #27.
60	Comment_Submitted_by_MattNykiel_IDConsvLeague2	We note that the USCG must utilize accident reports developed by independent, objective sources. The AAR is an industry, lobbying group for American railroads companies, including BNSF Railway, which is an active member of AAR. It is incumbent on the USCG to independently verify these statistics to ensure their accuracy. Rather than rely on the AAR report, we request the USCG evaluate and disclose its independent analysis of rail accident data provided by the Federal Railroad Administration’s Office of Safety Analysis. … Draft EA does not define what constitutes a “train accident” for the purposes of the AAR statistic or the USCG’s impact analysis. Federal Railroad Administration, 2019 Data Analyses available at http://safetydata.fra.dot.gov	Spills/Spill Response/ Derailments	A summary of accidents reported to the Federal Railroad Administration Office of Safety Analysis in the four-county area surrounding Sandpoint over the past 20 years has been added to Section 3.14 of the EA.
61	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The Draft EA states at page 71 that BNSF completed the installation of Positive Train Control and utilizes a network of detectors to measure the conditions of each passing freight car. However, the Draft EA fails to clarify whether or not BNSF and other railroad companies using BNSF’s rail line actively use this technology in a way that reduces or prevents train accidents in Idaho. For example, the Draft EA indicates that detectors are located in train depots west of Idaho, which may limit their ability to prevent accidents in the Sandpoint area.	Spills/Spill Response/ Derailments	Additional information related to the use of trackside detectors, Positive Train Control, and implementation of other prevention measures by BNSF to reduce the potential for accidents has been added to Section 3.14 of the EA. Clarifying language was added to indicate that hot bearing detectors and dragging equipment detectors are located within two miles of the study area in each direction.
62	Comment_Submitted_by_MattNykiel_IDConsvLeague2	We recommend the USCG consult the United States Geological Survey and the Bonneville Power Administration to determine the speed of water flow during spring runoff in Lake Pend Oreille and the Pend Oreille River. Using these water speeds, the USCG should then calculate how far a crude oil plume would propagate down river according to emergency response and equipment deployment times, if a derailment were to occur at the Connector.	Spills/Spill Response/ Derailments	Water speeds within Lake Pend Oreille and appropriate oil spill response strategies are taken into account in the Lake Pend Oreille GRP, provided in Appendix J of the EA. BNSF involvement and contributions to the LPO GRP are summarized in Section 3.14 of the EA.
63	Comment_Submitted_by_MattNykiel_IDConsvLeague2	…it is unclear from the Draft EA how many volunteers and how many of the limited professional emergency responders in the Sandpoint area have received training sufficient to guide them in a safe and efficient response to a hazardous materials spill.	Spills/Spill Response/ Derailments	An estimated 230 volunteers and local emergency responders have been trained by BNSF over the past 5 years. This clarification was added to the EA. This includes 25 at the 2015 LPO tabletop exercise, 32 at the 2016 LPO boom drill, 45 at the 2017 LPO boom drill, 50 at the Lightning Creek tabletop exercise, 30 at the 2018 LPO boom drill, and 47 at the 2019 LPO oil-under-ice training.

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64	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The protection section on page 72 of the Draft EA cites Section 33 of BNSF's System Special Instructions (August 1, 2018), as the source of instructions on what actions to take under excessive wind conditions, cold weather, or in the event of a tornado, flash flood, or earthquake. The Draft EA did not provide a citation to this document or make the document otherwise publicly available, so it is unclear whether or not the USCG evaluated this document to inform its discussion of accident and public safety risks in the Draft EA.	Spills/Spill Response/ Derailments	BNSF's System Special Instructions is considered proprietary corporate information. Reference to this document has been removed from the EA.
65	Comment_Submitted_by_MattNykiel_IDConsvLeague2	Discussing response exercises, the Draft EA identifies four tabletop exercises and three boom deployment trainings BNSF has facilitated in the past five years. However, only one After- Action Report was provided in Appendix L of the Draft EA. We request the USCG explain whether it analyzed and evaluated the potential impacts associated with the Connector based only on this single After-Action Report or others. If the USCG evaluated other After-Action Reports related to emergency response trainings, we further request the USCG disclose them. Lastly, we note that the After-Action Report provided in Attachment L only evaluates and reports the results of a training that took place on October 18, 2018. However, the training that occurred on October 18, 2018 was part of a two-day training facilitated by BNSF. We request the USCG inquire into the results of the training on October 17, 2018 and include the results from that training in an attachment to the EA.	Spills/Spill Response/ Derailments	Appendix L to the Draft EA contains the After Action reports for the October 17 and 18, 2018 US 95 Long Bridge Boom Deployment Exercise, the Exercise Feedback and Corrective Action Improvement Plan Summary Forms for the September 17 and 18, 2018 Lake Pend Oreille GRP- HWY 95 Long Bridge Booming Strategy, and the September 19, 2018 Lightning Creek Table Top Exercise After-Action Report/Improvement Plan. These are the reports describing the activities and discussing the findings of the most recent spill response exercises. As each round of exercises attempts to address the findings and improve upon the response of the previous exercise, these are the reports considered in the EA.
66	Comment_Submitted_by_MattNykiel_IDConsvLeague2	At page 74, the Draft EA does not define the "response area."	Spills/Spill Response/ Derailments	Clarification has been added defining the "response area" in Section 3.3.2 and Section 3.14 of the EA as the area covered by the Lake Pend Oreille and Pend Oreille River Geographic Response Plan, which encompasses the Cabinet Gorge Dam and all of Lake Pend Oreille and its tributaries located on the Clark Fork River down to Albeni Falls Dam, which is located on the Pend Oreille River.
71	Comment_Submitted_by_MattNykiel_IDConsvLeague2	…provide a more detailed discussion of resources and opportunities available for compensatory mitigation. As we mentioned above, there are many actions BNSF could take to further mitigate the potential impacts from the Connector, including but not limited to reducing train speeds to prevent derailments, covering rail cars with coal to reduce spill risk, and reducing the vapor pressure in crude oil tank cars to reduce the potentially explosive impacts of a derailment.	Spills/Spill Response/ Derailments	Additional information has been added to Section 3.14 of the EA to further characterize the preventation measures implemented by BNSF to reduce the potential for accidents and hazardous materials releases. These include compliance with current design and seismic standards per the American Railway Engineering and Maintenance-of-Way Association Manual for Railway Engineering, compliance with federal requirements for track speed, meeting or exceeding federal requirements for track inspection, use of trackside detectors and Positive Train Control to proactively identify potential issues and protect structures and waterways, community and employee safety training, and implementation of the LPO GRP.
83	Comment_Submitted_by_WilliamJacobson	I would like to see a bridge engineered to prevent a derailed car or cars from leaving the bridge and falling into the river or lake.	Spills/Spill Response/ Derailments	BNSF railroad bridges are designed by licensed professional engineers to meet current design standards per the American Railway Engineering and Maintenance-of-Way Association (AREMA) Manual for Railway Engineering. Prevention measures taken implemented by BNSF to minimize the potential for derailments and spills are summarized in Section 3.14 of the EA. Similar to roadways, accidents on railroads can be caused by a variety of factors, including human error. It is not feasible to design a railroad bridge to prevent all possible causes of accidents.
84	Comment_Submitted_by_WilliamJacobson	I would like to see a bridge design with a catchment system to prevent any spilled product from leaving the bridge and direct it to a tank or tanks off the bridge.	Spills/Spill Response/ Derailments	See response to comment 83. Current regulations and AREMA design standards do not require installation of catchment systems on railroad bridges over water bodies. A suspended "catchment system" under BR 3.9 (or BR 3.1) could reduce the available vertical and horizontal clearances which could adversely affect navigation under the bridge(s). Adjusting the height of the bridge to accomodate such as system would require changes to track elevations to maintain appropriate railroad grades. As indicated in Section 3.14 of the EA, according to FRA accident records, none of the accidents/incidents reported on BNSF rail lines in the Sandpoint area over the past 20 years were reported as hazardous releases. Therefore, the installation of a gutter or catchment system would pose an unreasonable cost to BNSF and its customers.
85	Comment_Submitted_by_WilliamJacobson	Predeploy oil booms in critical locations secured to the shoreline with heavy cable and tethered to the bottom with tethers of sufficient length to reach the surface. In the event of a spill inflate the system with permanently mounted compressors on the shore. Then remove the oil or other material with skimmers in the usual manner. This would save a great deal of time in moving water. Move equipment closer to the areas of critical need. Easier to know where that is with predeployed equipment.	Spills/Spill Response/ Derailments	The Best Available Protection technology oil spill containment technology in use by USCG (in coastal areas) or USEPA (in inland areas) does not include use of mile-long sections of inflatable boom tethered to the river bed or placed floating in open water due to reliability and maintenance issues. The river levels near the bridge fluctuate between 8-10 feet annually, freezes in winter and must remain open to boat traffic. BNSF has presented a Geographic Response Plan (GRP) strategy for the LPO Long Bridge to the NW Area Committee (US EPA and ID DEQ) that uses Best Available Protection equipment including a current buster, boom reels with 6,000 feet of boom, and several mobile skimming and storage devices. In 2018, BNSF worked with several agency partners including EPA, IDEQ, OD DOT and local Fire Departments/Emergency Managers along with USCG-approved Oil Spill Response Organizations (OSROs), to successfully test and demonstrate deployment of this equipment staged in the local community. In March 2019, BNSF trained local Firefighters, Marine Sheriffs, and local OSROs to operate airboats in iced-over or low-water conditions. In May 2019, BNSF met with USCG, USEPA, and IDEQ to review the LPO Long Bridge GRP strategy at the NW ACP meeting in Lewiston, ID.
95	Comment_Submitted_by_Shelby_RognstadCityofSandpoint	The EA does not consider how the Lake Pend Oreille and Pend Oreille River Geographic Response Plan (GRP) will need to be modified to accommodate new challenges resulting from the project. The EA does not consider the limitations of the GRP in its current state, nor how BNSF would mitigate those short-comings.	Spills/Spill Response/ Derailments	The Northwest Area Committee is responsible for implementation of the LPO GRP. BNSF provided recommended edits to the 2017 GRP to address vulnerabilities identified during the September 2017 exercise. See response to comment #85 for a summary of current coordination efforts between BNSF and the NWAC regarding proposed updates to the LPO GRP.
104	Comment_Submitted_by_Nancy_Schmidt	The EA does not consider how projected increases in rail traffic volumes in our area will increase the risk of a derailment. According to the Idaho Statewide Rail Plan from 2013, train volumes on Idahos network are projected to increase by 143% by 2040. Projected train traffic volumes directly relate to an evaluation of spill risk and derailment.	Spills/Spill Response/ Derailments	See response to comment #42.
106	Comment_Submitted_by_Nancy_Schmidt	The EA does not consider how the Lake Pend Oreille and Pend Oreille River Geographic Response Plan (GRP) will need to be modified to accommodate new challenges resulting from the project. One of the emergency response boat launch sites is Dog Beach. According to the EA, Dog Beach will have limited-to-no access during construction. To our knowledge, the GRP is the only framework currently available for emergency responders to use when addressing a derailment over the lake. The EA does not consider the limitations of the GRP in its current state, nor how BNSF would mitigate those short-comings.	Spills/Spill Response/ Derailments	See response to comment #28 and #95. As indicated in Section 3.14 of the EA, boat access to LPO can be acquired from at least 35 boat ramps along LPO, the Clark Fork River, and the Pend Oreille River.
115	Comment_Submitted_by_David_Robinson	The EA does not consider how projected increases in rail traffic volumes in our area will increase the risk of a derailment. According to the Idaho Statewide Rail Plan from 2013, train volumes on Idahos network are projected to increase by 143% by 2040. Projected train traffic volumes directly relate to an evaluation of spill risk and derailment.	Spills/Spill Response/ Derailments	See response to Comment #104
116	Comment_Submitted_by_David_Robinson	The EA does not consider how the Lake Pend Oreille and Pend Oreille River Geographic Response Plan (GRP) will need to be modified to accommodate new challenges resulting from the project. One of the emergency response boat launch sites is Dog Beach. According to the EA, Dog Beach will have limited-to-no access during construction. To our knowledge, the GRP is the only framework currently available for emergency responders to use when addressing a derailment over the lake. The EA does not consider the limitations of the GRP in its current state, nor how BNSF would mitigate those short-comings.	Spills/Spill Response/ Derailments	See response to Comment #106

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30	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	An EIS should also clarify statistics regarding current vehicle delay times for rail-side communities, as well as quantify expected delay reductions resulting from the Project. We also request clarification, supported by evidence gathered through the EIS process, as to how and to what degree more efficient movement of rail traffic through the Project area would improve vehicle traffic and delays in surrounding communities.	Traffic Wait Times/ Crossing Issue(s)	The purpose of the Project is to reduce the delay of freight and passenger rail traffic on the BNSF freight rail system between its Algoma main line track south of Sandpoint (BNSF milepost [MP] 5.1) and the Sandpoint Junction (MP 2.9), where BNSF and the Montana Rail Link main line tracks converge just north of the Sandpoint Amtrak Station. Reducing delays to roadway vehicle traffic at at-grade crossings is not the purpose of the project. Rather, it is a potential indirect benefit of improving the fluidity of movement of trains along this segment of main line track and contributes toward the Project's ability to meet one of the four identified goals: Minimize adverse impacts to the human and natural environment. The qualitatively discussion and logic presented throughout the EA contains sufficient detail to support this conclusion.
47	Comment_Submitted_by_MattNykiel_IDConsvLeague2	The Draft EA states: “Inefficiencies in the rail line, such as a bottleneck within the study area, may result in increases in shipping truck traffic over time.” The Draft EA goes on to say that shipping by truck causes greater emissions than shipping by train to suggest that building the Connector will result in decreased emissions because it will facilitate more rail traffic instead of truck traffic. However, the Draft EA fails to consider where this supposed increased truck traffic would occur. Sandpoint has had trouble meeting air quality standards, and if the bottleneck causes shippers to switch to trucks, this could be good for local air quality (due to less trains in Sandpoint) if the corresponding increase in truck traffic occurs elsewhere. Why does the USCG assume truck traffic would occur in Sandpoint, since most of BNSF’s freight is originating and terminating far away from Sandpoint? In addition, even under the assumption that highway truck traffic may increase through Sandpoint without installation of the Connector, air pollution may only increase if it is also assumed that the highway truck traffic increases come in the form of diesel trucks. But, the USCG provided no reasonable basis to assume this will be case. Analysts report that the adoption of electric vehicle technology in the freight sector, including light duty, medium duty, and heavy duty electric trucks, appears to be progressing faster than expected. Christer Tryggestad, et. al., “New reality: electric trucks and their implications on energy demand,” September 2017 available at www.mckinseyenergyinsights.com/insights/new-reality-electric-trucks-and-theirimplications-on-energy-demand/; see also Lorenzo Grande and Luke Gear, “Electric Trucks and Delivery Vans 2018-2028: Light Duty, Medium Duty, Heavy Duty” available at www.idtechex.com/research/reports/electrictrucks-and-delivery-vans-2018-2028-000609.asp?viewopt=showall.	Traffic Wait Times/ Crossing Issue(s)	The EA has been revised and no longer concludes that inefficiencies in the rail line, such as a bottleneck within the study area, may result in increases in shipping truck traffic over time. Other modes of shipping are available and shipping routes are highly dependent on origin and destination locations. Conclusions related to increased truck traffic in considering this project are considered speculative.
68	Comment_Submitted_by_MattNykiel_IDConsvLeague2	From the outset of this section [3.15 Traffic], it is unclear what the USCG’s scope of analysis is. In places, the Draft EA suggests the analysis extends 20 miles beyond the study area. In other places, the Draft EA focuses discussion around three at-grade crossings that experience vehicle delays outside the study area. And, in still other places the Draft EA appears only concerned with the BNSF right of way between mile post 2.9 and mile post 5.1. As a result, the public cannot discern what exactly the scope of analysis is in this section. Moreover, even if there were a clear scope of analysis, it’s unclear what principle or considerations the USCG relied on to determine the scope of analysis. We request the USCG clarify this.	Traffic Wait Times/ Crossing Issue(s)	The study area has been clarified in Section 3.15 of the EA: "Local traffic includes surface vehicle traffic on state and local roadways and watercraft traffic that utilizes LPO and Sand Creek. As stated in Section 1, existing rail traffic congestion results in congestion in Sandpoint and the surrounding communities, which causes a delay of the local and regional transport of people, goods, and services from eastern Washington across northern Idaho to northwest Montana. The study area for vehicle traffic includes the Project Area and at-grade rail crossings of private driveways and local County and City streets located on the BNSF, MRL, and UPRR railroad lines within 20 miles of the Project Area, which is the radius within which trains often must wait for an opportunity to cross the single-track section of the BNSF mainline. The predominance of watercraft traffic is associated with recreation and fishing, both occurring primarily during the summer boating season from May 1 through October 15. The study area for watercraft traffic is the Project Area at Bridges 3.1 and 3.9."
93	Comment_Submitted_by_Shelby_Rognstad_CityofSandpoint	The EA states that “drivers would likely see more rapid clearing of at-grade crossings, reduced congestion, and overall improvement in access to the Sandpoint area” without any corroborating evidence. The EA also states that implementation of the Proposed Action Alternative “would result in multiple safety benefits for …emergency response providers…associated with reduced train and vehicle congestion and wait times at grade crossings” again without any corroborating evidence.	Traffic Wait Times/ Crossing Issue(s)	See response to comment 30.
113	Comment_Submitted_by_Nancy_Schmidt	The EA states that “drivers would likely see more rapid clearing of at-grade crossings, reduced congestion, and overall improvement in access to the Sandpoint area” without any corroborating evidence.	Traffic Wait Times/ Crossing Issue(s)	See response to comment 30.
39	Comment_Submitted_by_JaneFritz	There was no mention of the Kalispel Tribe of Indians, whose reservation is in Washington State but who have land holdings in Bonner County, Idaho and were the aboriginal people whose homeland encompassed all of Lake Pend Oreille.	Tribal/ Historic Issues	Section 5.0 of the Draft EA states that: "The USCG initiated government-to-government Section 106 consultation with Native American Tribes on January 25, 2018. The Cultural Resources Technical Report for the Proposed Action Alternative was transmitted to the Kootenai Tribe of Idaho, the Coeur d' Alene Tribe, the Kalispel Tribe of Indians, and the Spokane Tribe of Indians." A comment letter was received during the public comment period on the Draft EA from Deane Osterman, Executive Director, Kalispel Tribe of Indians: Natural Resources. As further indicated in Section 5.0 of the Draft EA, "Tribal consultation will be ongoing through the EA process. The results of the consultation process will be described in the NEPA decision document (a Finding of No Significant Impact would be provided, if determined appropriate)."
72	Comment_Submitted_by_MelissaFrolander_WIRT_Attachment1	…the USCG is conducting incomplete, inadequate, government-to-government, Section 106 tribal consultations, by sending letters and a cultural resources technical report for the proposed action alternative to the Coeur d’Alene, Kalispel, Kootenai, and Spokane tribes (draft EA page 105), but not to my Confederated Salish and Kootenai Tribes (CSKT)…	Tribal/ Historic Issues	The Confederated Salish and Kootenai Tribes of the Flathead Reservation has been contacted and added to the list of tribes consulted in Section 5.1 of the EA.
99	Helen Yost (verbal)	...we're wondering why the Confederated Salish and Kootenai Tribes were left out of this Environmental Assessment. So as far as we can tell, also according to the EA, only the Kootenai Tribe has responded to requests from the Coast Guard or other, you know, federal agencies involved in this process for consultation, but that none of the other tribes have responded.· And yet even without any evidence of how the tribe responds to this project, the public is being asked to, you know, determine all the faults of the EA and of the project when we have no input from these very crucial agencies on this project...	Tribal/ Historic Issues	See response to comment #72
98	Andrew Kennaly (verbal)	Part of maintaining a downtown presence in a historic brick building built in 1906 involves doing what we can for upkeep on the building.· While the State Historic Society assumes nothing will happen to historic buildings, I feel this is inadequate. The pounding of pilings and heavy work during the construction phase has potential seismic effects.· The building has large, original stained glass windows.· If stress cracks do appear during the construction phase, will BNSF pay for repairs that include removing those large windows, transporting them to a city with the facilities to re-lead the glass, then reinstall them months later?	Vibration	Section 3.13 of the EA has been revised to address both Noise and Vibration. New verbiage has been added discussing the potential for structural damage to buildings as a result of vibration during both construction and operation. With the exception fo the Amtrak Depot, which is addressed via a new Vibration Assessment in Appendix K, there is liittle to no potential for structural damage to other structures. The building in question is located approximately one-half mile from the study area and will not be affected by vibration during either construction or operation of the Project.

Substantive Comments on the Draft Sandpoint Junction Connector Environmental Assessment

ID	File/Commenter	Comment	Topic Bucket	Response
11	Comment_Submitted_by_ChantillyHigbee_LPOWaterkeeper2	The EA cites the Spokane Valley-Rathdrum Prairie (SVRP) Aquifer Atlas (MacInnis et al. 2009) which provides an approximate yearly average of the total aquifer water budget from 1995 to 2005, and states that LPO contributes a yearly average of 32 million gallons per day (mgd), or approximately 4% of the total aquifer recharge volume. The EA does not cite the most recent update (2015) of this atlas, which states that LPO contributes a yearly average of 43 mgd. The EA does not cite any other peer-reviewed documentation or government reports identifying the current contribution of LPO to SVRP aquifer recharge.	Water Quality	Section 3.3.1 of the Draft EA has been updated citing the 2015 edition of the Spokane Valley-Rathdrum Prairie (SVRP) Aquifer Atlas (Boese et al. 2015): "Aquifer Protection District boundaries (IDEQ 2018b), the south end of LPO contributes 43 million gallons per day of water to the aquifer, or just over 4 percent of the aquifer's daily 985 million gallons per day recharge/inflow (Boese et al. 2015). The SVRP Aquifer Atlas was jointly developed by 12 agencies and universities in Washington and Idaho. It is intended to serve as an objective source of technical information and support planning efforts. Citing additional sources is not necessary.