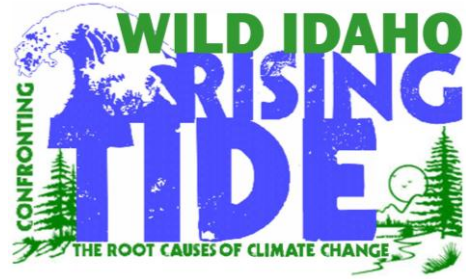


Wild Idaho Rising Tide
P.O. Box 9817, Moscow, Idaho 83843
Phone: 208-301-8039
Email: wild.idaho.rising.tide@gmail.com
Website: WildIdahoRisingTide.org



March 30, 2012

U.S. Army Corps of Engineers, Walla Walla District
CENWW-PD-EC, ATTN: Sandy Shelin
201 North Third Avenue
Walla Walla, WA 99362-1876
PortofLewistonDock@usace.army.mil

**Comments Addressing the Environmental Assessment and Draft Finding
of No Significant Impact for the Port of Lewiston Dock Expansion
and Storage Area Development**

On behalf of hundreds of members of Wild Idaho Rising Tide (WIRT) and similarly concerned and potentially impacted Moscow and U.S. Highway 95 corridor residents, I offer these comments to the Walla Walla District of the U.S. Army Corps of Engineers (Corps) about the recently released Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) for the Port of Lewiston (Port) Dock Expansion and Storage Area Development. The plan proposed by the Corps' preferred Alternative 2 would expand the existing dock from its present 100 feet to 250 feet parallel with the north bank of the Clearwater River, along the Corps-owned flood protection levee and adjacent shoreline land. It would also move a mooring pillar downstream in the river and develop two acres as a graveled storage area at current port facilities, among a half dozen other associated modifications. Because this construction within the port's easement for "industrial purposes" would impact federal Corps structures and property at the top of the Lower Granite Dam reservoir, the Corps must review the expansion project and consider approval. Numerous environmental and economic detriments could occur from this expensive endeavor, including, as the FONSI admits, "an adverse effect on several fish species listed as threatened under the Endangered Species Act or their critical habitat."

One of the most significant, explicitly stated purposes of these actions to increase Port capacity is the accommodation of larger equipment and oversized cargo on a regular basis, such as the modules locally referred to as "megaloads" bound for expansively destructive Alberta tar sands mining operations that are precipitating dramatic climate change. Several corporations have expressed an interest in hauling these unusually enormous loads on U.S. Highway 12 and/or U.S. Highway 95 and onward to the interstate system for construction, resource extraction, and production endeavors. Increased megaload traffic would further invade and degrade Interstate 90, Highway 95, Moscow streets, and Highway 12 through the Wild and Scenic Lochsa-Clearwater river corridor in Idaho. These overlegal transports have already incurred substantial

administrative costs for the Idaho Transportation Department, not to mention the yet uncalculated expenses of repairing road damages documented by megaload monitors.

It is unconscionable that the Corps would add to these disadvantages the exorbitant tax dollars that could be poured into remodeling a port that has been operating below cost for more than a decade as well as the extensive but rarely considered environmental devastation wrought by more industrial development. Citizens have good reasons to reject this port expansion fiasco. Together, north central Idahoans have prevented and protested tar sands transports on our roads; we will continue to resist and repulse megaloads in Idaho at their point of arrival at the Port and across our state. We urge Corps officials charged with analyses of and decisions about this proposed venture to choose the “No Action” Alternative 1 and consider the following suggestions and arguments along with WIRT’s attached July 22 Port of Lewiston Permit Application Comments, all respectfully submitted for inclusion in the public record.

Inadequate Analysis

Expansion of the Port’s dock and yards could secondarily and cumulatively impact many environmental and social factors: Clearwater and Snake river shoreline erosion and modification, floodplains and wetlands, water quantity and quality, fish and wildlife populations, riparian flooding hazards and protective measures, private and historic properties, area land use, aesthetics, and recreation, energy production and conservation, the regional economy and public resources, and the safety and welfare of Idaho, Montana, Oregon, and Washington citizens. Although the Corps is mandated to identify and deliberate multiple alternatives of the project, the 73 pages of the EA not only do not address many of these aspects, they only consider the proposed action in the preferred Alternative 2. For example, the Corps ignores the potential effects of increased megaload traffic that Port expansion would foist on the other users, shared infrastructure, and essential qualities of Highways 12 and 95. The EA also does not consider the more favorable location and use of deeper, nearby barge berthing facilities and diversification of Port activities to foster more truck and rail transportation. In light of the Port’s broad influence on many regional dynamics, the Corps should prepare a full environmental impact statement (EIS) and host public hearings on the Port expansion EA and/or EIS before finalizing decisions about this proposal.

Premature Decision

At the taxpayer expense of 13 million dollars, the Army Corps of Engineers is studying solutions to rising sediment levels in the Clearwater River channel and associated flood protection for Lewiston. The federal agency will soon issue a long-awaited environmental impact statement and comment period on costly dredging near the Clearwater/Snake confluence that, along with dock construction, could seriously affect salmon, steelhead, bull trout, and other already challenged aquatic species. Approving Port dock expansion prior to release of the dredging EIS and its findings would inappropriately overlook sediment issues that could arise during construction of an expanded dock and/or with continued Port operations. The proposed dock extension looms over only 13 feet of river depth near where both rivers drop their silt loads as they converge and approach slack water at the top of the Snake/Columbia river dam system. Future dredging to maintain sufficient berthing depth for barges is inevitable. Thus, any

decisions to proceed with port facilities modifications, which are fundamentally ill-advised in terms of the Port's location and inherent threats of flooding Lewiston, should be postponed until the dredging EIS examines Port sediment issues and the Corps produces an full EIS for this project.

Declining Port Business

Why "throw good money after bad"? For over a decade and as indicated by the Port's own data, the quantity of cargo and container shipments moving through the Port of Lewiston has declined significantly. Subsequently, taxpayers have heavily subsidized below-cost Port operations and maintenance. Shipment decreases and the availability of other area ports render expansion of the Port's dock and facilities, obviously a pork barrel project for its proponents, both moot and unjustified during lean fiscal times. Considering that river bottom sediment accumulation is reducing barge berthing clearance by about an inch per year, the proposed expansion is a boondoggle that would further waste more tax dollars on its economic and environmental nonsense. Instead of continued taxpayer investment in unviable and increasingly unneeded Lewiston dock facilities, pertinent officials could strengthen and integrate rail and truck routes and transportation in the region.

Displaced Megaloads

In the June 22, 2011, Public Notice of Application for Permit, Port of Lewiston personnel noted that "the purpose of the proposed work is to increase efficiency of the operation, allow berthing of multiple barges, and accommodate loading and unloading of oversized cargo (<http://wildidahorisingtide.com.files.wordpress.com/2012/03/port-of-lewiston-expansion-permit-application-6-22-111.pdf>)." However, since May 2010, citizen protests and legal challenges have caused corporations seeking to offload megaloads at the Port to rethink their proposed land routes through Idaho and Montana. Only 33 such shipments of large cargo landed at the Port in October 2010 and remained stranded until July 2011, while another 23 launched from the Port of Wilma between September and December 2011. All other similar transports have stopped using, perhaps permanently, Idaho's lone port and two connected rural roads. ExxonMobil/Imperial Oil has apparently abandoned the Port of Lewiston for shipping Asian-made, tar sands-bound equipment, but the seaport 465 river miles inland from the Pacific Ocean has proven a tempting target for other industrial traffic to the continent's interior. However, according to a mid-January 2012 Lewiston Tribune article, Port manager David Doeringsfeld said, "We are not currently working with any companies on transporting any oversized loads on Highway 95 or 12 in the near future (<http://wildidahorisingtide.org/2012/01/15/port-of-lewistons-helmsman-navigates-busy-waters/>)." Apparently, the necessity of Port dock and yard expansion for megaload use is grounded in the precarious presumption that "if we build it, they will come," which is not a well-founded basis for taxpayer expenditures during an economic downturn similarly precipitated by unwise speculation.

Economic Detriments

The Port of Lewiston's stated mission is to foster 'economic growth.' But the Port expansion EA says that the proposed action, "would not necessarily result in any increase in the number of barges, the amount of cargo, or the use of the Port as a transportation hub, as usage is largely based on the state of the economy and on unknown market forces." Taxpayers should not be expected to finance a project that could only questionably buttress the regional economy and that will more likely damage it. By accommodating megaload traffic, dock expansion will degrade north central Idaho roads, compromise the highway access, safety, and convenience of private, business, and recreational drivers, and undermine the only growing industry in the region, tourism and travel. By assisting the multinational corporate transformation of the treasured Lochsa-Clearwater Wild and Scenic River environs around Highway 12 into a "high and wide" route to the Alberta tar sands, a half dozen port personnel could destroy 4600 jobs. The corridor's wild, pristine traits and six national scenic/historic route designations support a \$150 million annual travel/tourism industry. Likewise, changing the character of Moscow's economically and culturally vibrant downtown, by encouraging an industrial truck route along Highway 95 through Washington Street, unfairly disadvantages small town businesses. The Corps considered none of these economic aspects and related cumulative effects in its Port expansion EA; a comprehensive EIS review of the project is obviously in order.

Thank you for your consideration of these comments on the Port of Lewiston Dock Expansion and Storage Area Development, which I submit for the public record on behalf of my WIRT colleagues and concerned citizens unable to comment.

Helen Yost
Wild Idaho Rising Tide
P.O. Box 9817
Moscow, Idaho 83843
wild.idaho.rising.tide@gmail.com
208-301-8039