#No2ndBridge Concerns to Address

Compiled by Palouse Environmental Sustainability Coalition (PESC)

For further comment resources, reference these two reports, each in PDF format, and search them to find information on topics that interest you:

1. Draft Environmental Assessment BNSF Sandpoint Junction Connector Project, Bonner County (draft EA)

2. Lake Pend Oreille and Pend Oreille River Geographic Response Plan

Also check the appendices for each topic, which contain specialized information.

Sandpoint Impacts: Residents, Businesses, Visitors

The three- to five-year construction project would significantly impact the Sandpoint community surrounding Lake Pend Oreille, Sand Creek, and City Beach Park, in multiple ways, including:

* Construction of two temporary, work bridges and three permanent, railroad bridges (See draft EA pages 3-4 for general project descriptions)

* Increased, industrial traffic and noise (See the Noise Impacts section of this paper)

* Pile driving would continue for approximately 18 months, with 748 piles driven at 20-50 strikes per pile for the two temporary bridges and 352 piles driven with 1,200-1,600 strikes per pile for the two permanent bridges.

* Construction staging areas near Sand Creek, Dog Beach, and U.S. Highway 95 (See draft EA page 18, figure 8)

* Changes in navigation between bridge piles may pose safety issues. Three bridges with piers that do not align with each other would be present during the construction process (See draft EA pages 20, 58, and 64-66).

* Probable, intermittent closures of Bridge Street, resulting in lack of access to the Sandpoint Train Station, City Beach Park, City Beach, Windbag, and private marinas, Best Western Edgewater Resort, Sandpoint RV Park, Seasons at Sandpoint condominiums, and the Lake Pend Oreille Water treatment plant (See draft EA page 79)

* The draft EA does not reflect the significant impacts of these closures, by:

a) Not acknowledging them as a major concern, and

b) Stating that an alternate route would be provided, without location and process identifications (See draft EA pages 64-79).

* The BNSF railroad right-of-way includes Highway 95 and Serenity Lee Trail as sanctioned uses of railroad land, but Dog Beach is considered an “unsanctioned, customary use” where people “walk their dogs” (See draft EA pages 63-64).

* Financial losses from decreased tourism not addressed (See draft EA page 25)

* Contaminated soil from previous, industrial sites would be disturbed (See draft EA pages 76-79)

* Sediment from the lake bottom would be disturbed, and turbidity would increase, thus coal deposits may re-pollute air and water (See draft EA page 57, and Air Quality and Coal sections of this paper)

* Herbicides would be used to remove some plants (See draft EA page 75).

* Protection of wetlands and waters (See draft EA pages 32-42, and reports in Appendices C and H)

* Some wetlands would be filled (See draft EA pages 37-41).

* Cumulative effects (See draft EA pages 80-81 and 85-87)

* Some street and sidewalk projects are listed as “reasonably foreseeable, future actions (RFFA)” by the City of Sandpoint (See draft EA page 81).

Noise Impacts

The main noise will come from driving bridge piles (See draft EA pages 17-24, 50, 58, 68, and Appendix F Biological Assessment). Primary concerns include the loudness, pitch, and frequency of the pile drivers, which would exceed ambient noise and occur for 18 months during construction. Only loudness, but not the pitch or frequency of noise, is addressed in the draft EA. According to page 29 of the Appendix F Biological Assessment and a draft EA chart on page 68, construction work would exceed ambient noise. But the report implies on page 50 that construction noise would not exceed ambient noise that includes train whistles at 140 decibels. Noises above 75 decibels can cause harm to humans.

Sand Creek

Temporary Bridge: Assuming the project could drive two temporary, work bridge piles per day, the draft EA expects pile driving to occur for one month. With 20-50 strikes per pile at 101-110 decibels, the project would drive 48 total piles.

Permanent Bridge: Although the project would likely drive up to four permanent bridge piles per day, the report assumes, for scheduling purposes, that construction would drive two piles per day for about one month. With 1,200 strikes per pile at 101-110 decibels, the project would drive a total of 64 permanent piles.

Lake Pend Oreille

Temporary Bridge: Assuming the project could drive two temporary, work bridge piles per day, the draft EA expects pile driving to occur for one year. With 20-50 strikes per pile at 101-110 decibels, construction would install 700 total piles.

Permanent Bridge: Although the project would likely drive up to four piles per day, the draft EA assumes, for scheduling purposes, that construction would drive two piles per day for about six months. With 1,600 strikes per pile at 101-110 decibels, it would install a total of 288 permanent piles.

Pages	Topic
19-23	Construction plans and noise levels
50	Range of construction noises
58	Effect of noise on bull trout
67-68	Ambient and construction noise levels

Concerns to address

Levels of noise and their impacts on community, businesses, tourism, and aquatic life
Omissions on how hammer pitches and strike frequency/number impacts human bodies and psyches
Contradictions in draft EA presentations of noise information

Coal Impacts

BNSF does not cover its train cars loaded with coal, and thus raises citizen concerns that railroad bridge construction processes may disturb coal nuggets and dust both on land and in Lake Pend Oreille and Sand Creek waters, further causing air and water pollution. BNSF states no evidence of coal spillage, although it derives its information from Cowlitz County and Bellingham, Washington, information sources.

Pages	Topic
25-29	Coal and air quality
26-27	Out-of-area studies
35	Coal in water
57	Lake sediment disturbance
75	Coal as a non-issue

Concerns to address

Several sources contradict the BNSF claim that no coal or coal dust has leaked from open train cars, for example:

1) *Major Coal Train Lawsuit Settled by Environmental Groups, BNSF*, by Samantha Larson in the November 15, 2016, issue of Crosscut (https://crosscut.com/2016/11/breaking-major-coal-train-lawsuit-settled-by-environmental-groups-bnsf). The article states that, in 2016, environmental groups in Seattle and Spokane sued BNSF for spilling coal from its open rail cars in transit. BNSF agreed to pay one million dollars for State of Washington environmental programs, to clean up and remove coal from areas near water most affected by its coal trains, and to explore the possibility of covering coal cars.

2) The City of Spokane has compiled research on the coal dust issue, and could serve as another information resource, especially as it is closely down-track from Sandpoint and coal pollution in both locations would be similar.

* Coal dust and nuggets pollute both air and water.

* Coal also impacts railroad tracks, getting caught in the ballast where it becomes damp, then freezes and thaws, compromising the track bed and causing derailments. Does evidence exist that any of the derailments in the north Idaho corridor have been caused by coal debris?

Impacts on Bull Trout

The U.S. Fish and Wildlife Service has designated and listed bull trout as "threatened" under the Endangered Species Act. The draft EA concedes that the noise and turbidity of railroad bridge construction processes may harm or kill individual, bull trout fish in the project zone, through loss of food and increases in predators. The report suggests that construction would impact only a small portion of the total, bull trout population in Lake Pend Oreille, so their loss is negligible.

The draft EA also acknowledges that bull trout require passage both up- and down-stream to complete their life cycle. Before dam-building, bull trout swam up the Pend Oreille River into Lake Pend Oreille, and from the lake to the river and downstream to spawn, then returned to the lake to over-winter. The report mentions programs underway to help bull trout bypass dams and complete this journey, but suggests that these actions will help replenish any bull trout lost to construction processes. However, the description on page 53 of the journey shows the construction zone wholly within the migration zone (Also see the map on page 30 of Appendix F). The "small area where fish will be exposed" is a critical area within this migratory path (page 57).

Pages	Topic
47-48, 49-57, 82-84	Bull trout
49-51	Injury to fish
51	Bull trout threatened designation
53	Migration in the construction zone
54	Map
55	Injury to fish
57	Increased predators
58	Loss of food
82	Projects to restore fish
84	Impacts as "minor, short term"
Appendix F	Biological Assessment

Concerns to address

With bull trout designated as threatened, is some loss justifiable?

Does the construction project/zone conflict with downstream programs to get bull trout past Albeni Dam, up the Pend Oreille River, and into Lake Pend Oreille?

Impacts on Birds

The BNSF project would destroy some wetlands and impact birds in the area, listed on pages 45-46. Although several of these birds may nest in wetlands, the draft EA study did not identify any bird nests. Should BNSF plans add a provision to encourage birds to seek other wetlands for nesting, before construction begins to fill affected wetlands?

Pages	Topic
45-46, 48-49	Birds
37-43	Wetlands, floodplains

Protection of Waters & Wetlands (unfinished)

Pages	Topic
32-36	Description of waters and aquifer
37-42	Wetlands and floodplains