Appendix A

Summary of Substantive Draft EA Comments and Responses

Substantive comments on the Draft Environmental Assessment (EA) for the Sandpoint Junction Connector Project (Project) were received from February 6 to May 1, 2019, related to several topic areas. The U.S. Coast Guard (USCG) has addressed substantive comments by making revisions and adding information as necessary in this Final EA. The changes made between the Draft EA and Final EA are summarized by topic area below.

Air Quality

Comments

Comments regarding the air quality discussion presented in the Draft EA requested clarification on some data sources and called for a quantitative air emissions analysis to be performed for both the construction and operation phases of the Project.

Response

Corrections to existing references supporting statements regarding air quality have been made and additional sources of information have been cited in Sections 3.1 (Air Quality) and 6.0 (References). An operational air emissions analysis is not required because the Project would not modify train traffic volumes (see the Train Capacity topic below) and a transportation conformity analysis for construction is not required because the study area is located within a limited PM_{10} maintenance area. However, due to the anticipated construction duration and public concern, a conformity analysis for construction was conducted and found the total annual emissions of PM_{10} associated with Project construction would be below allowable de minimis thresholds. The results of this analysis have been added to Section 3.1 (Air Quality).

Train Capacity

Comments

Several comments were received assuming that the Project would increase train capacity of the main line, requesting discussion of the magnitude of potential rail traffic increases, and revisions to the environmental effects analysis considering the alleged rail traffic increases. Some comments point to the future rail traffic projections for Idaho's rail network projected by the Idaho Department of Transportation and presented in the Idaho State Rail Plan and other point to future rail traffic projection methods used to evaluate potential environmental effects of other unrelated projects. Other commenters identified a flaw in logic used to make the statement in the Draft EA that increased rail congestion would result in an increase in truck traffic, stating that if that is true, it must also be true that increased rail efficiency would result in more rail traffic.

Response

Additional detail has been added to the discussion on train capacity on the main line through Sandpoint and across LPO in Section 1.2 (Purpose and Need). The added discussion clarifies that 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 main lines leading into the Sandpoint and LPO area. The Idaho Department of Transportation's future rail traffic projection is now discussed in this section. The Final EA continues to acknowledge the trend observed over the past 30 year of increasing train traffic and the reasonable expectation that this trend would continue; however, rail traffic projection methods used in evaluating the potential environmental effects of the other projects mentioned by commenters are not applicable to this Project because, unlike the other projects referenced, this Project would not result in any new freight or passenger origins or destinations along the rail line.

After reconsidering the statement made linking increased rail congestion with increased truck traffic, this statement was determined to be too speculative because trains that travel through Sandpoint serve a much broader geographic region for which there are numerous widely dispersed roadway options for truck transport. This statement is not made in the Final EA.

Climate Change

The Draft EA contained no discussion on the Project's potential contribution to climate change. Verbiage related to this has been added to Section 3.1 (Air Quality).

Fugitive Coal Dust

Comments

Comments received related to fugitive coal dust emissions from trains requested a more specific citation of a coal particulate matter study in Missoula, Montana; requested consideration of a study by Jaffe et al. 2015; questioned the validity and objectiveness of claims that implementation of BNSF Railway Company's (BNSF's) Coal Loading Rule achieves an 85 percent reduction in fugitive coal dust emission from passing trains; and questioned the temporal effectiveness of dust suppressant surfactants applied to coal cars, citing BNSF's Pasco respray facility as evidence that surfactant must be reapplied to remain effective on long trips.

Response

Reference to the analytical results of the Missoula study has been added to Section 3.1 (Air Quality) and Section 6.0 (References). The Jaffe study was referenced by the Millennium Bulk Terminals – Longview Environmental Impact Statement (EIS) coal dust analysis. Additional details from the Millennium Bulk Terminals analysis have been added to Section 3.1. The Surface Transportation Board's review and conclusions validating the BNSF Coal Loading Rule have been referenced in Section 3.1. A discussion of the results and relevance of a coal dust study conducted prior to the opening of the Pasco respray facility, as described in the Millennium Bulk Terminals – Longview EIS, has also been added to Section 3.1. A discussion of the March 3, 2017 consent decree on coal dust and an update on the status of the study of coal car covers has also been added to Section 3.1.

Construction-Related Effects

Comments

Comments were received requesting additional information related to how the Project would be constructed. Specific information requested included the estimated material quantities needed for Project construction, the number of truck trips required for material and equipment deliveries, the number of anticipated workers that would be on-site, the number and type of watercraft needed to support construction, and a more thorough explanation of scheduled timing of in-water work activities and year-round construction activity.

Response

In response to these comments, additional details regarding construction materials, equipment, and scheduling have been described in Sections 2.3.4 (Construction Equipment) and 2.3.5 (Construction Schedule and Design Year). Estimated delivery truck trips, construction worker commute trips, and Project-related vessel use have been described in Section 3.15 (Traffic).

Cumulative Effects

Comments

Reference to other potential double-tracking projects along the BNSF main line and several specific projects were described as either ongoing or occurring during the anticipated Project construction time frame.

Response

While BNSF has proactively attempted 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, BNSF has not scheduled or funded other system improvements on its main line that would influence train movement through Sandpoint other than the West Algoma to Cocolalla Double Track project, currently under construction. Descriptions of that project and the following projects have been added to Section 3.17 (Cumulative Impacts):

- Best Western Edgewater Resort, Sandpoint, ID - building demolition and reconstruction work to begin in September 2020 and continue for approximately 14 to 16 months
- City of Sandpoint – rebuilding historic downtown buildings damaged in February 2019 fire.
- Proposed PacWest silicon smelter – The smelter would be served by the Pend Oreille Valley Railroad with connections both to BNSF and Union Pacific in Dover, Idaho.

Endangered Species/Bull Trout

Comments

Several comments were received claiming that the analysis of the potential effects to bull trout was incomplete or inadequate for various reasons and that conclusions regarding these effects were unsupported because consultation under Section 7 of the Endangered Species Act had

not been completed. In addition, a comment was received indicating that the information regarding minimum LPO bull trout population statistics was not properly cited in the Biological Assessment (BA).

Response

Consultation with the U.S. Fish and Wildlife Service has now been completed, and the U.S. Fish and Wildlife Service has issued a Biological Opinion for the Project that determined the Project will not jeopardize the survival and recovery of bull trout or adversely modify its designated critical habitat. Reference to the Biological Opinion has been added to Section 3.8 (Endangered Species Act-Listed Species and Critical Habitat) and the complete Biological Opinion has been provided in **Appendix F**. The citation for information regarding minimum LPO bull trout population statistics in the BA should have been USFWS 2015c rather than USFWS 2015b.

Roadway Vehicle Traffic

Comments

Comments received related to general roadway vehicle traffic circulation identified concerns over road closures and access to specific parts of town during Project construction and potential increases in local traffic volumes in Sandpoint during construction. In addition, comments questioned the logic used linking fluidity of train movement through Sandpoint to local truck traffic volumes to support the conclusion that increased rail congestion would lead to increased roadway congestion as freight shippers may shift from shipping by rail to shipping by truck.

Response

A discussion of estimated delivery truck trips and construction worker commute trips was added to Section 3.15 (Traffic) along with statements about road closure coordination and local street use with the City of Sandpoint. In addition, 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.

Migratory Birds

Comments

Concerns were raised by commenters about the level of review and evaluation of potential effects to bald eagles, osprey, and other predatory birds.

Response

Additional detail regarding the level of review conducted has been added to Section 3.7 (Fish and Wildlife) to better support the conclusions regarding potential effects and the appropriateness of the avoidance and minimization measure recommended in Section 4.1 (Avoidance and Minimization).

Navigation

Comments

Comments were received concerning the potential effects to navigation associated with the design and construction of the temporary and permanent bridges, specifically due to the alignment of the existing and new bridge piers, changes in surface water currents and turbulence, changes in sediment transport and shoaling patterns, and anticipated vessel traffic during construction.

Response

A bridge permit application has been submitted to the USCG and potential effects to navigation are being evaluated under that review process. USCG's statement that the current Bridge 3.1 and 3.9 designs meet the reasonable needs of navigation has been added to the EA and cited. Additional information has been added to Section 3.2 (Geology, Soils, and Topography) of the EA related to potential changes to surface water currents and turbulence and potential changes in sediment transport associated with new bridge piers.

Noise

Comments

Comments were received requesting additional information regarding noise levels associated with increased rail traffic and locomotive horn/whistles, as well as citations for federal noise emission standards that apply to railroads. An analysis of potential impacts to businesses due to increased noise levels during construction was also requested.

Response

The Noise section of the EA (Section 3.13) was largely rewritten for clarity. Citations for federal noise emission standards that apply to railroads was added to the section. An analysis of construction noise has also been added that estimates potential noise levels at various distances from construction equipment. BNSF is coordinating with the City of Sandpoint on measures that will be implemented during construction to minimize potential disturbances to the community. These minimization measures have been added to Section 4.1.6 of the Final EA.

From an operational standpoint, an increase in train traffic volumes is not anticipated as a result of the Proposed Action. However, the operational noise section of the EA was revised 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.

A discussion of train horns was also added to the noise section of the EA. Federal regulations are identified that require train horns to produce sound levels between 96 and 110 dBA at 100 feet forward of the locomotive (49 CFR 229.129) and require trains to sound their horns as they approach public at-grade crossings (49 CFR 222.21). Distant train horns sounded on BNSF and other railroad lines can be heard in the study area, but no public at-grade crossings exist within the study area.

Vibration

Comments

Concern was expressed over potential structural damage to a church located in downtown Sandpoint as a result of pile driving during construction. Concern was also expressed over potential structural damage to the historic Amtrak Depot as a result of operational vibration on the new main line track.

Response

Section 3.13 of the EA was revised to address both Noise and Vibration to discuss the potential for structural damage to buildings as a result of vibration during both construction and operation. 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. However, there is potential for structural damage to the depot during construction. Vibration monitoring will be conducted during construction to minimize the potential for damage. Potential damage to other structures as a result of project related vibration resulting from construction or operation of the Project is not anticipated.

Sediment Contamination

Comments

Concern over the potential migration of contaminated sediments from the Clark Fork Delta to the Project area and requests for sediment sampling in the Project area was expressed by commenters.

Response

Additional details describing the agencies contacted and the review level performed in assessing the potential for sediment in the Project area to be contaminated and the permits relevant to sediment contamination concerns that have been issued for the Project have been added to Section 3.14 (Hazardous Materials and Wastes). Measures for controlling potential sediment resuspension have been clarified in Sections 3.2 (Geology, Soils, and Topography) and 3.3 (Water Resources and Water Quality). Additional clarification regarding the potential pathway for resuspended sediment to contaminate drinking water supplies has been added to Section 3.3.

Socioeconomics

Comments

Discussion of potential socioeconomic effects of the Project in the Draft EA was brief, and several points were raised by commenters related to socioeconomics. Specific comments requested additional support for statements that the Project would have beneficial socioeconomic effects, particularly with respect to construction-related demand for temporary lodging and other services; changes in access to local businesses related to potential road closures, traffic increases, parking demands, noise; and conflicts with local festivals and events.

Response

A socioeconomics memo has been prepared containing additional details addressing these concerns. Additional details have been added to support conclusions made regarding potential socioeconomic impacts in Section 3.10, which has been renamed from *Environmental Justice* to *Socioeconomics and Environmental Justice*. The socioeconomics memo has been provided in **Appendix H**.

Spills, Spill Response, and Derailments

Comments

Many comments focused on the risk of hazardous materials spills associated with potential train derailments occurring in the Project area, particularly over Lake Pend Oreille. Questions were raised related to what BNSF does to ensure safe operations and prevent derailments and what the response strategies would be for different kinds of potential spills, including oil spills and contaminant spills that may be denser than water or even water soluble, considering the range of weather conditions experienced in the Lake Pend Oreille region. Some comments included suggestions regarding innovative design concepts for bridges that prevent derailed trains from leaving the bridge and pre-deployed contaminant containment systems that could reduce spill response time.

Response

Clarification and additional detail have been added to the discussion of the single versus double track main line configuration train capacity in Section 1.0 (Introduction). The Federal Railroad Administration accident statistics and additional detail regarding BNSF's approach to preventing derailments have been added to Section 3.14 (Hazardous Materials and Wastes) to further characterize derailment risk. Additional details regarding spill response planning for different types of spills under different weather conditions have been added to Section 3.14. Unfortunately, the innovative design concepts suggested are not considered feasible or practical for this Project.

Roadway Traffic Wait Times and At-Grade Crossings

Comments

Reduced wait times for roadway vehicle traffic at at-grade railroad crossings is described in several sections throughout the EA as an indirect benefit of improving train movement fluidity, which is the purpose of the Project. Requests to clarify the study area used to evaluate effects on roadway traffic at at-grade crossings and to provide a quantitative traffic analysis for these crossings were received.

Response

The study area descriptions for roadway vehicle traffic and vessel traffic have been clarified in Section 3.15 (Traffic). The qualitative description of reduced wait times for roadway vehicle traffic at at-grade railroad crossings as an indirect benefit of improving train movement fluidity has been clarified as a logical, indirect benefit throughout the Final EA.

Tribal and Historic Issues

Comments

The USCG was notified by public comment that the Confederated Salish and Kootenai Tribes of the Flathead Reservation was not contacted prior to the first public comment period on the Draft EA.

Response

The USCG notified the Confederated Salish and Kootenai Tribes of the Flathead Reservation of the Project and of the second public comment period in writing; this contact was noted in Section 5.1 (Agency and Tribal Consultation).

Water Quality

Comments

A comment was received indicating that outdated statistics describing Lake Pend Oreille's contribution to the Rathdrum Prairie Aquifer from the 2009 Spokane Valley-Rathdrum Prairie (SVRP) Aquifer Atlas were cited in Section 3.3 (Water Resources and Water Quality) of the Draft EA.

Response

The statistics and the reference to the 2015 version of the Spokane Valley-Rathdrum Prairie (SVRP) Aquifer Atlas have been updated in Section 3.3. The reference has also been updated in Section 6.0 (References).