













June 12, 2016

My name is Dave Miller. I live in Camas, Washington, about 1/3 mile from the tracks where the coal trains will pass.

My main concern is with section 4.8 page 26, "Cause Wildlife Strikes along the Rail Corridor in Washington State".

I have been volunteering for the US Fish & Wildlife Service at the refuges in the gorge since 2006. Several years ago, while working at the Pierce National Wildlife Refuge, I found the carcass of an elk which had been hit by a train. A few months later I found another, so I got permission from the refuge manager to walk the edge of the refuge next to the tracks with a GPS and count the carcasses and bones. In the two miles of track that run through the Pierce refuge, I found the carcasses and remains of 55 animals – mostly elk, but also deer, turkey vultures and other animals. Every time I visit the area near the tracks, there are new carcasses. I suspect that this is happening at every place where the tracks pass through good wildlife habitat, along the entire route from the coal mines to Vancouver.

More trains will mean more wildlife killed by trains, and more wildlife will be blocked from migrating across the tracks like they do currently.

As you know this is not the only coal/oil export proposal. The combination of all the proposed trains will wreak havoc on the wildlife in the gorge that live near the tracks, especially at the Pierce refuge.

I urge you to reject this proposal, but if you do not, I urge you to require the construction of appropriate wildlife overpasses/underpasses at places where large numbers of wildlife are being killed. At the very least you must require the trains to pass very slowly through these areas.

Additional concerns:

1. In section 4.8.7.2 (Other Measures to Be Considered), it states:

The co-lead agencies recommend BNSF identify and monitor wildlife-train collision and migration barrier hotspots along the rail corridors to determine whether current and projected levels of rail traffic would result in levels of mortality or migration barrier effects that could measurably affect the status of local wildlife populations. If levels of collision mortality and delays to wildlife movement are determined to have a measurable effect on the status of local wildlife populations, suitable wildlife crossing structures and other measures, such as fencing, should be considered as appropriate. BNSF should consult with WDFW and USFWS in designing approaches to identify and monitor hotspots and in identifying suitable crossing structures and other measures.

This monitoring needs to be done by someone other than BNSF. It is highly unlikely that BNSF would "identify and monitor wildlife-train collision and migration barrier hotspots". What motivation would they have to do this? In fact they have every motivation NOT to do this. BNSF does not currently report any of the animals killed by trains on their tracks; I doubt that your "consideration" would make them start doing it. In fact someone has removed the antlers from every dead bull elk I have found along the tracks. I am pretty sure that the BNSF maintenance crews are removing the antlers. Why would a company who seems to think nothing of killing wildlife and (illegally) harvesting parts from the carcasses, all of a sudden become a wildlife advocate and pay to build structures to prevent animals from being killed? This "mitigation" has no teeth and is woefully inadequate.

2. Besides directly killing wildlife, increased fossil fuel train traffic will:
 - a. Prevent animals from migrating across and down the tracks like they do currently (there are numerous game trails crossing the tracks). At some point very soon the tracks will become a 1200 mile barrier wall, because there will be a train on them most of the time. Think about the wildlife impacts of that.

- b. Make a nearly continuous, deafening roar at the refuges. This will add stress to the wildlife, and disrupt their aural communications.
- c. Greatly increase diesel emissions.
- d. BNSF is currently spraying herbicide into creeks along the railroad (see photos below). More trains probably means more herbicide along the tracks.
- e. Note that the cumulative effects of all these projects multiply the negatives of each project. You need to look at the effects of *all* the projects.

I have several theories why so many animals are being killed by the trains. In all my visits to the Pierce refuge, I have only seen or heard of two animals being killed by cars on Hwy 14, which runs parallel to the tracks, while over 55 animals have been killed by trains. Obviously there is something different going on at the tracks vs. the highway. Here are my theories, based on my observations at Pierce:

- Elk and deer tend to be herding animals. If a herd is near (or on) the tracks when a train approaches, they may run across the tracks to safety. The last few animals may dash in front of the train to avoid becoming separated from the herd.
- Animals use the tracks as a travel path. I have seen evidence of this (animal tracks & trail camera photos). When a train comes, their natural instinct is to outrun it, which they cannot do. The trains are traveling about 50mph through the Pierce refuge.
- There are a lot of trains hauling grain, and a lot of grain is spilled on the tracks (see photos). The grain attracts animals, especially during the winter. The animals are hit and killed by trains. The grain also sprouts and matures, and animals come to eat the tender shoots or grain heads, at all times of the year.
- An animal is killed on the tracks. Scavengers come to feed on the carcass and are also killed. This is probably why I have found dead turkey vultures and coyotes.

In the pages that follow are photos of a *few* of the animals killed at the Pierce refuge. Many more photos can be found at <https://www.flickr.com/photos/refugestewards/albums/7215763777090383> I will also attach a spreadsheet which has GPS waypoints etc. for animal carcasses found up to 11/2/2013. I have found new carcasses since then but haven't had a chance to update the spreadsheet.

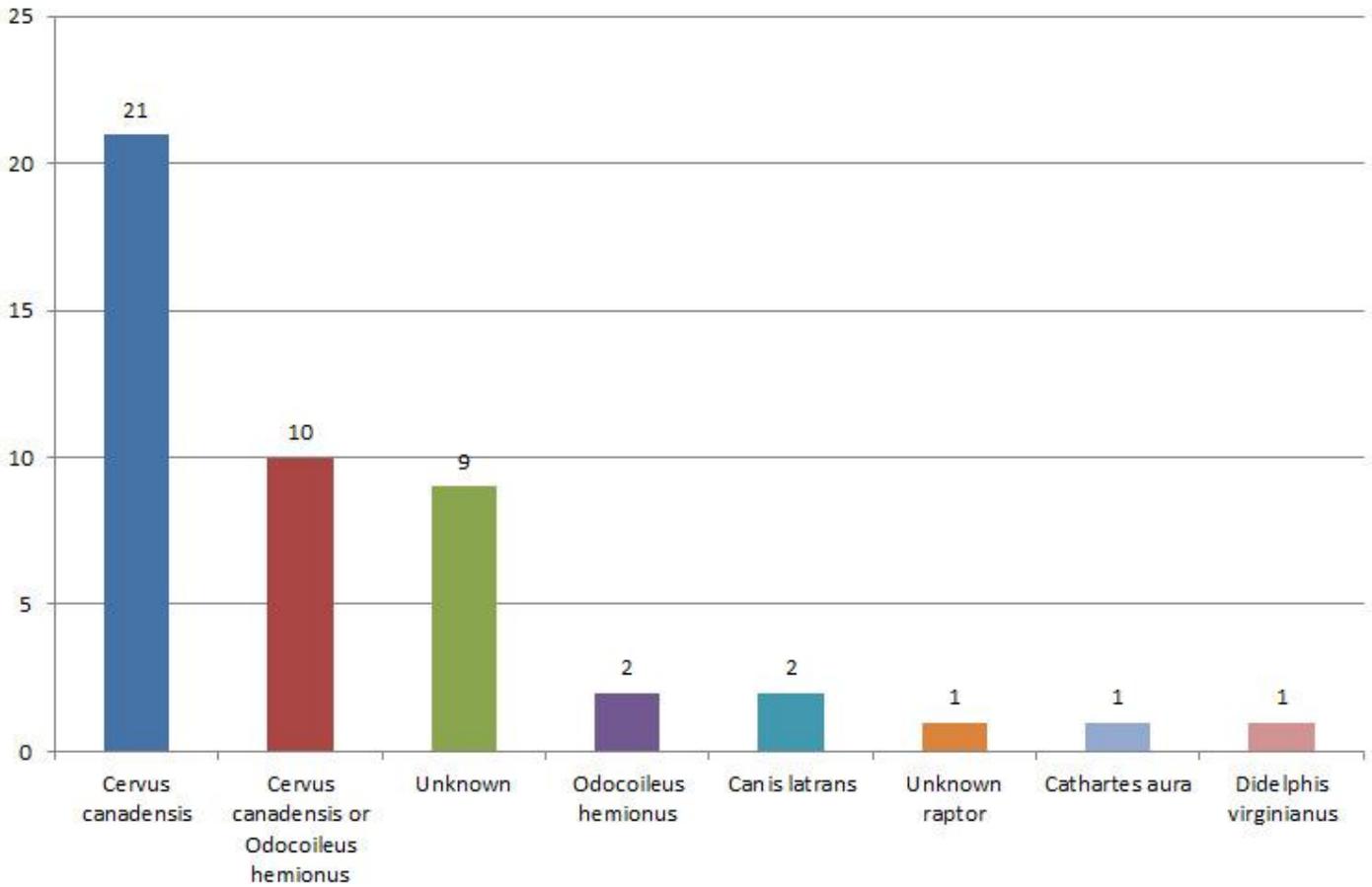
Regards,

Dave Miller
Camas, WA 98607



Count of species

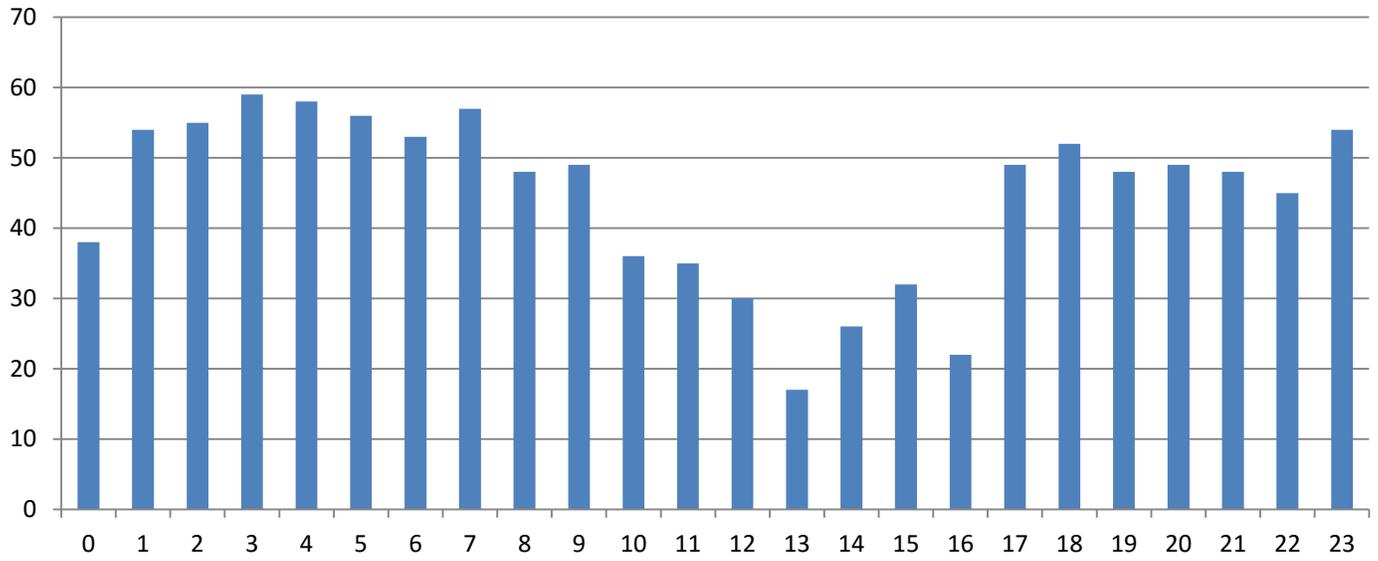
Wildlife Killed by Trains at Pierce NWR from surveys March 2012-November 2013



species ▼

Trains by Hour of Day

Feb 2 - Mar 8, 2013









Turkey Vulture





Note that its legs are broken. Also notice that someone has cut off the antlers. I am pretty sure that when an elk is killed, the railroad maintenance workers cut off the antlers and take them. Someone has cut off the antlers from every single bull elk/buck deer I have found dead along the tracks.





















SPYPOINT

05/07/2013 17:23

○ 87°F







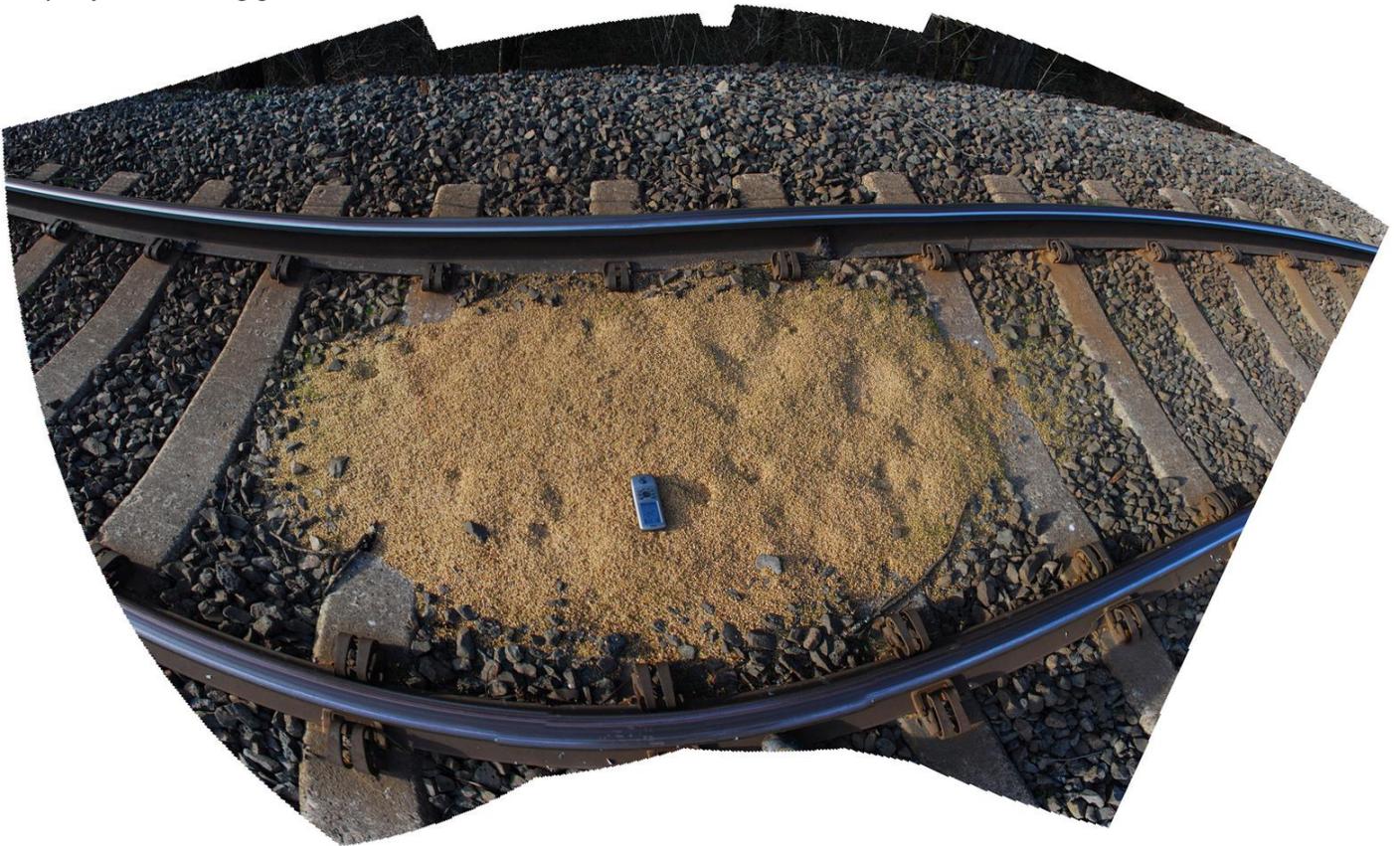


Note that herbicide has been sprayed over the creek.





Dark-eyed juncos eating grain on the tracks.



Panoramic image of the same grain spill.