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Orofino, ID 83544

Commissioners

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Stan Leach, Chair
J. P. "Pete" Curfman
Don Ebert

Clearwater County Commissioners

September 29, 2004

Surface Transportation Board
Case Control Unit
Washington, DC
20423



Re: Docket No. AB-872X

Dear Sir:

Enclosed please find comments submitted by Clearwater County Commissioners. The comments are a copy of correspondence received by us from the Clearwater County Project Impact Flood Committee. We feel that the correspondence received by us which references the "Watershed Assessment and Master Plan for Flood Mitigation and Stream Restoration on Lower Orofino Creek," prepared for Clearwater County by Water Consulting Inc., should prove that the rail road bridges on Orofino Creek are a threat to life and property. We feel that there is enough proof to at least warrant further investigation.

We believe the railroad trestles and bridges are a threat to property and life safety and should be removed.

Thank you for considering our request. If we can provide further assistance please contact this office.

Sincerely,

Handwritten signature of Don Ebert in cursive.

Don Ebert
Clearwater County Commissioner

Project Impact

Building a Disaster Resistant Community

Clearwater County Project Impact Flood Committee

May 4, 2004

The Honorable Stan Leach
Chair, Clearwater County Commissioners
P.O. Box 586
Orofino, ID 83544

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Re: Konkolville-Jaype Spur Structures- Abandonment

Dear Commissioner Leach:

In lieu of Watco's April 3, 2004 announcement in the Lewiston Morning Tribune to abandon the Konkolville-Jaype spur of the Great Northwest Railroad, we urge Clearwater County to request through Watco's environmental review that the salvage process include the removal of all existing rail line structures along the spur along Orofino Creek. As the Clearwater County Project Impact Flood Committee and your flood mitigation advisory group, we believe that non-maintained rail line structures on the Konkolville- Jaype spur pose real and serious flood mitigation issues on Orofino Creek and a threat to life and property in Clearwater County.

During the twentieth century, Clearwater County experienced major flood events in 1933, 1948, 1964/65 and 1996. The majority of devastation occurred as the result of high-water events on Orofino Creek. With the Orofino Creek Master Plan for Flood Mitigation/Stream Restoration, the County set in motion a plan for mitigation on the lower 4.5 miles of the creek and is now developing projects and seeking funding. This is very positive; however, we must continue to work on minimizing threat by looking at ALL potential threats, especially those areas upstream from the population center. The non-maintained rail structures in the middle reaches of the Orofino Creek watershed is a tremendous threat.

Concern for this issue became evident during the high-water event of January 2003 when Clearwater County staff observed what was happening to two of the lower trestles on Orofino Creek and video taped their observations. At the request of our committee, the stream restoration engineer working on the Orofino Creek Master Plan for Flood Mitigation/Stream Restoration walked several miles up Orofino Creek during April 2003. The following is an excerpt from Section 2.3.5 of the Orofino Creek Master Plan where the engineer addresses the threat:

Railroad trestles with numerous, closely-spaced piers present an especially dangerous scenario. The middle watershed is said to possess as many as 20 railroad trestle stream crossings. During a site visit to the middle watershed

following a flood event, debris jams were observed at all three railroad trestles visited. The debris jams had forced water above and around the bridge and caused extensive scour as noted by the newly-formed downstream depositional bars and freshly-eroded banks. Since the railroad is abandoned and not maintained, the effects of debris jams and ice jams are likely to contribute excess sediment to the lower watershed and potentially generate surges of flood water, debris, sediment and ice as they become dislodged.

Although we have been unable to identify the exact numbers and types of rail line structures involved, we believe as many as forty structures may exist along the Konkolville-Jaype rail line adjacent to or having some affect on Orofino Creek. The Idaho Department of State Lands records indicate that eleven (11) trestles and twelve (12) culverts exist on state land. As we understand the abandonment process, the maintenance responsibility for these structures shall reside with property owners. If the structures are not removed, the costs and liability shall impact many landowners over many years to come. The maintenance or removal costs for these structures will be costly and difficult to accomplish. Realistically, how well will structures be maintained if they are of little or no use to the property owner? What kind of costs will the property owner incur to remove the structures?

Prior to the sale of the railroad to Watco, we worked with you to address the maintenance issue with Camas Railnet and supported your efforts in addressing the County's flood mitigation concern in your October 27 and October 29, 2003 letters to Camas Railnet. This prompted Camas Railnet to conduct maintenance on the line. At that time, Camas Railnet could not reach some of the structures because of the poor condition of the rail line. Then, we opened dialogue with Kevin Spradlin of Camas Railnet at the December 17, 2003 Project Impact Steering Committee meeting. As initially planned at the December 17th meeting, a tour of the rail line never occurred between Camas Railnet, the County and the City of Orofino due to the weather and the change in rail line ownership. Our diligence has not yet satisfactorily addressed this issue.

In this 120-day abandonment process, we urge you to act quickly and take a strong position on the rail line abandonment by requesting that all structures, including concrete box culverts, corrugated metal and arch type pipes, or any other appurtenance that affects the flow of water into Orofino Creek, be removed in the Konkolville-Jaype rail line salvage process. If you need our assistance in addressing this flood mitigation issue or in gathering more documentation, please let us know.

Sincerely,

The Clearwater County Project Impact Flood Committee
