

E0-3104



SURFACE TRANSPORTATION BOARD

Washington, DC 20423

Office Environmental Analysis

February 26, 2019

Brian Lindamood
Alaska Railroad Corp.
327 W Ship Creek Ave
Anchorage, AK 99501

Re: Docket No. FD 35095, Alaska Railroad Corporation - Construction and Operation
Exemption - A Rail Line Extension to Port MacKenzie, Alaska: Comments on
Quarterly Report for the Fourth Quarter of 2018

Dear Mr. Lindamood:

In its November 17, 2011 decision granting the Alaska Railroad Corporation (ARRC) the authority to construct and operate the Port MacKenzie rail line extension, the Board imposed 100 mitigation measures on the project. Mitigation Measure #98 requires ARRC to submit quarterly reports to the Board's Office of Environmental Analysis (OEA) on the progress of, implementation of, and compliance with the Board-imposed mitigation measures. On February 1, 2019, ARRC submitted a report for the fourth quarter of 2018.

OEA has reviewed the quarterly report for October 1, 2018 through December 31, 2018 and our comments are attached.

If you have any questions, please contact Dave Navecky, OEA's Project Manager, at 202-245-0294.

Sincerely,

Victoria Rutson
Director
Office of Environmental Analysis

cc: Kathryn Kusske Floyd, Venable LLP
Jay Johnson, Venable LLP

ATTACHMENT
Docket No. FD 35095
Port MacKenzie Rail Line Extension

I. OEA Comments on Previous Quarterly Reports (April through June 2018)

Mitigation Measures #37 (page 11) and #47 (page 14) – Since the 2017 second quarterly report, ARRC has stated that they are currently drafting an updated Moose Mitigation Strategy Plan with input from ADF&G and USFWS. The status of these measures has not changed over the past year. Has the Moose Mitigation Strategy been updated and finalized?

Resolved.

II. OEA Comments on Previous Quarterly Report (July through September 2018)

General Comment (page 1): Please ensure the introduction paragraph states the correct quarter and time period (Months) for the quarterly report. The 3rd Quarter report states the previous quarter's time frame.

Resolved (but see new comment similar to this for Q4 2018).

Mitigation Measure #71 (page 19): Please ensure the Construction Status map posted on the www.portmacrail.com website is the most current map. The Construction Status map attached to the 3rd Quarter Report is dated March 2018 while the Construction Status map on the website is dated September 2017. Also, the March 2018 Construction Status map states that clearing for Reddane Road is schedule for winter 2017. Please ensure that all time frames mentioned on the Construction Status map are current.

Partially resolved: The new December 2018 Construction Status map still states that clearing for Reddane Road and the rail corridor is scheduled for Winter 2017. Please ensure that all time frames mentioned are current.

Mitigation Measures #46 (page 14): Now that many culverts have been installed for some time, please provide a brief status update on the results of the inspections that have occurred. Have any conditions been observed that prevent fish passage or are culverts functioning properly and accommodating fish passage?

Resolved.

III. OEA Comments on Quarterly Report for October 1, 2018 through December 31, 2018

General Comment – Please ensure all time frames and quarter references are correct throughout the quarterly report. The Mitigation Checklist table is titled “Second Quarter 2018 (July to September)”; *Cultural Resources* and *Permitting* on Page 2 reference 3rd Quarter; the Subject line on Page 1 states “July 2018 through September 2018”.