

Appendix B – Written Comments on Draft EIS

B – Written Comments on Draft EIS

Appendix B contains all written comments received on the Draft EIS.

Elected Officials

- Mayor, Fairbanks North Star Borough (Comment Number 54)

Federal Agencies

- Department of the Interior (Comment Numbers 34 and 119)
- Environmental Protection Agency (Comment Number 60)
- National Marine Fisheries Service (Comment Number 76)

State Agencies

- Alaska Department of Transportation and Public Facilities (Comment Number 67)

Local Agencies

- Fairbanks Metropolitan Area Transportation System (Comment Number 62)
- Fairbanks Fish and Game Advisory Committee (Comment Numbers 68 and 80)

Organizations

- A&W Wholesale Co., Inc. (Comment Number 56)
- Alaska Farm Bureau, Inc. (Comment Number 64)
- Alaska Railroad Corporation (Comment Numbers 22, 61, and 71)
- Alaska Fish and Game Advisory Board (Comment Number 55)
- Alaska Miners Association, Inc. (Comment Number 20)
- Alaska Outdoor Council (Comment Number 53)
- Alaska Trappers Association (Comment Number 59)
- Alyeska Pipeline Service Company (Comment Number 74)
- Citizens' Advisory Commission on Federal Areas (Comment Numbers 49 and 52)
- Delta Fish and Game Advisory Committee (Comment Number 38)
- Eielson Farm Community (Comment Number 30)
- Railroad Safety and Development Group (Comment Number 33)
- Resource Development Council (Comment Number 48)
- Salcha's Neighborly Organization (Comment Number 1)
- Shaw Creek Boat Owners LLC (Comment Number 44)
- Whitestone Community Association (Comment Number 12)

Citizens

- Allen, Bill and Nancy (Comment Number 40)
- Bless, Ronald (Comment Number 19)
- Blockcolsky, W.E. (Comment Number 75)
- Boone, Courtney (Comment Number 47)
- Brannan, James (Comment Number 17)
- Claxton, David (Comment Number 63)

- Claxton, Toni (Comment Number 51)
- Corcoran, Mary (Comment Number 43)
- Curnow, Christopher and Debra (Comment Number 72)
- Curtis, Rochel (Comment Number 14)
- Dalrymple, Larry (Comment Number 36)
- Davies, Robyn (Comment Number 31)
- Davies, Stuart M. (Comment Number 5)
- Dietrich, Brad (Comment Number 35)
- Etcheverry, Darcy (Comment Number 29)
- Fletcher, Randall (Comment Number 46)
- Gavin, Michael D. (Comment Number 18)
- Gouwens, Sarah (Comment Number 10)
- Gregory, Jeff (Comment Number 69)
- Griffin Jr., Herbert L. (Comment Number 28)
- Haines, Megan (Comment Number 6)
- Halvarson, Ivar (Comment Number 77)
- Hill, Jimmie W. (Comment Number 58)
- Hopkins, Luke (Comment Number 42)
- Howk, Kristy (Comment Number 15)
- Howk, Murray E. (Comment Number 16)
- Jacobson, Jeff (Comment Number 27)
- Jeffries, Steven C. (Comment Number 23)
- Jenkins, Michael E. (Comment Number 21)
- Jewkes, Leonard (Comment Number 11)
- Morphis, Ted and Tracy (Comment Number 50 and 124)
- Parker, James (Comment Number 37)
- Parrish, April (Comment Number 4)
- Parsons, Joshua R. (Comment Number 26)
- Pope, Philip (Comment Number 57)
- Richard, Ryan (Comment Number 3)
- Richards, Gerald A (Comment Number 66)
- Schikora, Rick (Comment Number 65)
- Schikora, Cheryl (Comment Number 73)
- Schuhmann and Groseclose, Barbara and Bob (Comment Number 2)
- Schwartz, Margaret (Comment Number 24)
- Severin, Ken (Comment Number 25)
- Stenberg, Eric (Comment Number 13)
- Trifone, Katie (Comment Number 9)
- Vincent, Steve (Comment Number 32)
- Vincent, Steven and Kathleen (Comment Number 45)
- Vroman, Patricia (Comment Number 39)
- Whipple, William C. and Joyce A. (Comment Number 121)
- Wilcox-Healey, Vanessa (Comment Number 7)
- Williams, David J. (Comment Number 8)

STB Incoming Correspondence Record

Page 1 of 1

Comment Number: 1

Correspondence Information

Docket #: FD 34658 0
 Name of Sender: Morris Mills Date Received: 01/15/2009
 Group: Salcha's Neighborly Organization Date of Letter:
 01/15/2009

Submitter's Comments

STB Finance Docket No. 34658

For Salcha Route 1 would reduce the interaction of people, vehicles and trains. Route two would give us a new school, but intrude on native burial grounds, back side of the bluff by the school, plus native archeological sites at the mouth of the Salcha river. for some insight to the last several years, www.salcha.org has archived information on it's website. I also put a link on there for public input to your site.

1

Comment Number: 2

Surface Transportation Board

Incoming Correspondence Record

#EI-16247

Correspondence Information

Docket #: FD 34658 0
 Name of Sender: Barbara Schuhmann & Bob Groschase
 Date Received: 12/22/2008
 Group: Date of Letter:

Submitter's Comments

We cannot fall from the proposed EIS whether you have considered the impacts of the Alaska Railroad being routed along the 5 Mile Clear Creek. The Clear Creek is not featured on any of your maps, and so we are afraid you are not taking into consideration the impacts of building the Railroad along this spring-fed, beautiful creek.

South of the Tanana Flats Training Area ("TFTA") there are probably 50 private cabins and private landholdings along this creek.

If you are recognizing this creek, it should be listed on Figure S-4 of the proposed EIS. The Clear Creek parallels the Tanana River, about one mile west of the Tanana. It empties into a slough of the Tanana opposite Flag Hill. It flows from southeast to northwest and then turns south. It flows into the Tanana River south of the TFTA. The TFTA flows into and across the TFTA, emptying into the Tanana River to the north. It would probably run in between your Central Alternatives 1 and 2. It looks like Connector E would cross it, and possibly all of Connectors A, B and C.

We wanted to be sure that you are aware of this creek. We are concerned that either alternative might run right on top of the creek or the cabins along it.

There are at least three types of fish that are in the Clear Creek: salmon (late summer/fall), whitefish, and grayling. It is a beautiful creek all year round and does not freeze in winter because it is spring fed.

People drive riverboats up and down the creek all summer, so any railroad crossings would have to be high enough to allow that to continue.

Bob owns about 30 acres along the Clear Creek. Tract E of Alaska State Land Survey 87-200, according to the Survey Plat recorded Nov. 27, 1989 as Plat No. 89-114. Records of the Fairbanks Recording District, Fourth Judicial District, State of Alaska. His patent was recorded in Book 686, Page 0491 on Nov. 28, 1960, as Instr. No. 90-21027. If you put the Survey 89-114 on your map, you will see that the creek runs through Sections 11, 13 and 14 of T1S, R4E, N4R. The Creek originates further southeast, and flows northwest into Section 10 and 4.

We ask that before any EIS or any alternative is approved, that the impacts on the Clear Creek be clearly studied, presented and taken into account.

Thank you.

Barbara Schuhmann
 Robert Groschase

<http://www.stb.dot.gov/ect1/correspondence.nsf/PublicIncomingByDocketNumber/081EA...> 1/6/2009

STB Incoming Correspondence Record Page 1 of 1 Surface Transportation Board Incoming Correspondence Record #EI-16248 Correspondence Information <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Docket #:</td> <td style="width: 30%;">FD 34658.0</td> <td style="width: 30%;">Date Received:</td> <td style="width: 10%;">12/26/2008</td> </tr> <tr> <td>Name of Sender:</td> <td>Ryan Richard</td> <td>Date of Letter:</td> <td></td> </tr> <tr> <td>Group:</td> <td></td> <td></td> <td></td> </tr> </table> Submitter's Comments STB Finance Docket No. 34658 I have no environmental concerns and support extending the rail system to Delta Junction	Docket #:	FD 34658.0	Date Received:	12/26/2008	Name of Sender:	Ryan Richard	Date of Letter:		Group:				Comment Number: 3 April Parrish SC31000 Review of DEIS for ARRC To: David Navecky STB Finance Docket No.34658, Surface Transportation Board 395 E Street SW, Washington DC 20423 Dear David Navecky, It has recently come to my attention that the Alaska Railroad Corporation has submitted a proposal for public review concerning the creation of an 80 mile rail line between North Pole and Delta Junction, Alaska. As an interested citizen, I have reviewed the draft environmental impact statement regarding this plan and have offered my comments, questions and suggestions below. 1 Firstly, I would like to discuss the socioeconomic impacts that would result if the rail line were to be extended. I am concerned that many of the jobs created from this major construction project would be filled with persons from outside of our state. It is vital to Alaska's economy to keep our young workforce employed with in-state jobs for two reasons; it costs the state considerably less time and money to use local job resources and second our local workforce is more educated about our landscape, economy and lifestyle. Because they have lived and worked here local employees can provide valuable insight and suggestion to state projects. I would urge the ARRC to use local resources whenever possible as it will impede younger generations from migrating to the lower 48. 2 Another issue related to the workforce is the section regarding "construction worker housing." Specifically, what are the environmental impacts regarding the building of 33,000 housing units? Has the impact of this independent construction project been evaluated? Also, what happens when the rail line is complete, what is to become of these units? I would be interested to see what the city of Fairbanks has to say about the influx of such a large workforce population and any issues they see arising from the proposed action. In the DEIS it is stated that the rail line could possibly increase "tourism" between the proposed area. How much traffic for recreational purposes is going in-between North Pole and Delta Junction? I am unaware of any tourism resources or opportunities in this area and doubt any would be created as a result of the proposed rail line. Also, if tourism were to increase in these areas it would be beneficial and necessary to review the socioeconomic impacts of increased consumerism in North Pole and Delta Junction. 3 My final concerns lie within the direct impact to the physical environment or landscape. Since the rail line will be built in close proximity to the Tanana River and in a floodplain zone, what steps will be taken to ensure bank erosion will not affect the rail line? Also, in the Eielson Alternative Segment #3, it was proposed to have 17 crossings and it is stated that, "most of the activities proposed along Eielson Alternative Segment 3 would likely result in low impacts" (to the environment). I cannot see how the construction of 17 crossings would have a low impact; I feel this is a biased statement in support of the easiest or most suitable option for the ARRC and not for our environment. Also, how will the ARRC ensure that potable groundwater for neighboring communities is not affected? This question is of vital importance to local residents. 4 5 Comment Number: 4 April Parrish SC31000 Review of DEIS for ARRC To: David Navecky STB Finance Docket No.34658, Surface Transportation Board 395 E Street SW, Washington DC 20423 Dear David Navecky, It has recently come to my attention that the Alaska Railroad Corporation has submitted a proposal for public review concerning the creation of an 80 mile rail line between North Pole and Delta Junction, Alaska. As an interested citizen, I have reviewed the draft environmental impact statement regarding this plan and have offered my comments, questions and suggestions below. 1 Firstly, I would like to discuss the socioeconomic impacts that would result if the rail line were to be extended. I am concerned that many of the jobs created from this major construction project would be filled with persons from outside of our state. It is vital to Alaska's economy to keep our young workforce employed with in-state jobs for two reasons; it costs the state considerably less time and money to use local job resources and second our local workforce is more educated about our landscape, economy and lifestyle. Because they have lived and worked here local employees can provide valuable insight and suggestion to state projects. I would urge the ARRC to use local resources whenever possible as it will impede younger generations from migrating to the lower 48. 2 Another issue related to the workforce is the section regarding "construction worker housing." Specifically, what are the environmental impacts regarding the building of 33,000 housing units? Has the impact of this independent construction project been evaluated? Also, what happens when the rail line is complete, what is to become of these units? I would be interested to see what the city of Fairbanks has to say about the influx of such a large workforce population and any issues they see arising from the proposed action. In the DEIS it is stated that the rail line could possibly increase "tourism" between the proposed area. How much traffic for recreational purposes is going in-between North Pole and Delta Junction? I am unaware of any tourism resources or opportunities in this area and doubt any would be created as a result of the proposed rail line. Also, if tourism were to increase in these areas it would be beneficial and necessary to review the socioeconomic impacts of increased consumerism in North Pole and Delta Junction. 3 My final concerns lie within the direct impact to the physical environment or landscape. Since the rail line will be built in close proximity to the Tanana River and in a floodplain zone, what steps will be taken to ensure bank erosion will not affect the rail line? Also, in the Eielson Alternative Segment #3, it was proposed to have 17 crossings and it is stated that, "most of the activities proposed along Eielson Alternative Segment 3 would likely result in low impacts" (to the environment). I cannot see how the construction of 17 crossings would have a low impact; I feel this is a biased statement in support of the easiest or most suitable option for the ARRC and not for our environment. Also, how will the ARRC ensure that potable groundwater for neighboring communities is not affected? This question is of vital importance to local residents. 4 5
Docket #:	FD 34658.0	Date Received:	12/26/2008										
Name of Sender:	Ryan Richard	Date of Letter:											
Group:													

<http://www.stb.dot.gov/ect/1/correspondence.nsf/PublicIncomingByDocketNumber/10765F...> 1/6/2009

6 Finally, there is little discussion on the creation of power lines and towers to supply energy to the ancillary structures along the rail line. How many towers will be needed and what district would the power be supplied from? Again, this is a concern for local residents because they do not want to see their energy rates go up as a result of a massive construction project. In addition, I would like to see a discussion on possible environmental effects from the leakage of train lubricants, diesel fuel etc. 7 The Alaska Railroad Corporation provides a substantial benefit to Alaska's economy and it is in our best interest to continue to increase our rail line as it helps us transport good and people as well as providing jobs to our community. However, our natural landscape and environment is of higher importance to the people of this state and we wish for this project to move forward only if the ARRC does everything in its power to ensure that our physical landscape will not be permanently impacted as a result. I appreciate you taking my thoughts and concerns into account, thank you. Sincerely, April M. Parrish Alaska Pacific University Undergrad Student	Page 1 of 1 STB Incoming Correspondence Record Comment Number: 5 Surface Transportation Board Incoming Correspondence Record #EI-16304 <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;">Correspondence Information</td> </tr> <tr> <td style="width: 50%;">Docket #: FD 34658 0</td> <td style="width: 50%;">Date Received: 01/14/2009</td> </tr> <tr> <td>Name of Sender: Stuart M. Davies</td> <td>Date of Letter: 01/07/2009</td> </tr> <tr> <td colspan="2"> Submitter's Comments I am an active farmer and land owner in the area. I feel I am a good steward of the land and have a passion for reasonable transportation and energy issues. I am a member of the Alaska Railroad and have been two active transportation corridors. Please keep the rail line in the current active corridor, Elsieon Alternative Segment 3. </td> </tr> <tr> <td colspan="2"> Image Attachment(s) ARR Public Comment.docx </td> </tr> </table> ARR Public Comment.docx http://www.stb.dot.gov/ectl/ecompendence.nsf/PublicIncomingByDocketNumber/DD8F... 2/2/2009	Correspondence Information		Docket #: FD 34658 0	Date Received: 01/14/2009	Name of Sender: Stuart M. Davies	Date of Letter: 01/07/2009	Submitter's Comments I am an active farmer and land owner in the area. I feel I am a good steward of the land and have a passion for reasonable transportation and energy issues. I am a member of the Alaska Railroad and have been two active transportation corridors. Please keep the rail line in the current active corridor, Elsieon Alternative Segment 3.		Image Attachment(s) ARR Public Comment.docx	
Correspondence Information											
Docket #: FD 34658 0	Date Received: 01/14/2009										
Name of Sender: Stuart M. Davies	Date of Letter: 01/07/2009										
Submitter's Comments I am an active farmer and land owner in the area. I feel I am a good steward of the land and have a passion for reasonable transportation and energy issues. I am a member of the Alaska Railroad and have been two active transportation corridors. Please keep the rail line in the current active corridor, Elsieon Alternative Segment 3.											
Image Attachment(s) ARR Public Comment.docx											

[Comment Number: 5 (continued)] January 7, 2009 David Navecky STB Finance Docket No. 34658 Surface Transportation Board 395 E. Street S.W. Washington, D.C. 20423-0001 Dear Mr. Navecky: Please consider the following comments to help the board decide the best route for the Alaska Railroad Corporation's Northern Rail Extension Project from North Pole, AK to Delta Junction, AK. These comments refer to the Eielson Alternative Segments only. My family and I are stakeholders in this process as our homes and farms lie along the path of Eielson Alternative Segments 1 & 2. Naturally, we oppose this proposed route because of the negative impacts construction and operation of a railroad would have to us and our rural lifestyle. A partial list of these negative impacts include property devaluation, loss of income from farming, restricted access to recreation (fishing, hunting, trapping, skiing, snowmachining, dog sledding etc), creation of safety hazards, increased noise, vibration, loss of visual aesthetics, loss of wildlife habitat, loss of flyway habitat (my farm is a familiar stopping place for migrating waterfowl in the Spring and Fall), and the list could go on. In short, this route would destroy our rural lifestyle. We constructed our retirement home on our farm in 2003. We had no idea then that the ARRC would plan a rail line in our back yard. On a positive note, we are not opposed to the railroad and hope this project will be the continuation of a rail line into Canada and the continental United States. The ARRC's preferred route is <i>Eielson Alternative Segment 3</i>. We also prefer this route for the following reasons: 1. The Eielson Alternative Segment 3 would operate in an established transportation and utility corridor. This corridor includes the 4 lane Richardson Highway, Golden Valley Electric Association's high voltage transmission line, the ARR spur to Eielson Air Force Base, the old Richardson Hwy, and the always active, miles long runway at Eielson AFB. 2. Prevents the establishment of a second corridor on the south and west sides of Pile Driver Slough (Eielson Alternative Segments 1 & 2) 3. There would be less impact on private property and no impact to farming. 4. No greater environmental impact as the existing transportation and utility corridor already impacts this route. 5. Concentrates noise, vibration and safety issues in the established transportation and utility corridor.	[Comment Number: 5 (continued)] 6. Most of the south and west banks of Pile Driver Slough would remain in its natural state. 7. Stays on military land until it is connected to the Salcha Segments. 8. A quick view of the routes on the map reveals that this segment is not only the preferred route but the most logical being straighter and shorter. 9. Any recreational impacts to this segment are outlined in ARRC's required mitigation. 10. All of the negatives affecting our homes and property noted above would go away. In conclusion, my family, neighbors and I hope that the STB will approve the ARRC's preferred route, Eielson Alternative Segment 3. The Alaska Farm Bureau and the Eielson Farm Community oppose any loss of agricultural land as the result of the construction of a rail line. We have been waiting since 2005 for a decision regarding the routing of the railroad. We hope that a decision can be made sooner than later. I hope you decide in our favor so that we can plan farming activities without the cloud of impending loss. Thank you for this opportunity to correspond with you. I would be happy to answer any questions about us or our farming activities. Sincerely, Stuart M. Davies Robyn D. Davies PO Box 55266 North Pole, AK 99705 907-490-6485
---	--

Comment Number: 6 Docket #: FD 34658 0 Name of Sender: Megan Haines Date Received: 01/15/2009 Group: 01/15/2009 Date of Letter: 01/15/2009 Submitter's Comments Dear David Navecky, Firstly let me thank you for giving me the opportunity to review and comment on the DEIS concerning the rail line between North Pole and Delta Junction, Alaska. There are a couple issues which I am concerned about. The first issue is the possible disruption of migration patterns for the different species within the proposed project area and how you are going to address this issue. Secondly I am very concerned about the possibility of seismic activity and possible train derailment and consequently any spills and/or injury to people aboard the train. What kind of construction and maintenance techniques do you plan to implement to lessen the likely hood of such an event? I would like to also comment on how readable this DEIS was and to thank you for the clear and understandable writing. Sincerely, Megan Haines	
Comment Number: 7 Correspondence Information Docket #: FD 34658 0 Name of Sender: Vanessa Willcox-Healey Date Received: 01/15/2009 Group: 01/15/2009 Date of Letter: 01/15/2009 Submitter's Comments First I would like to commend you for writing an Environmental Impact Statement that is understandable to the general public. I found the DEIS easy to understand and appreciated that most of the more technical terms were explained in context. One addition I feel would help the reader have a better understanding of the proposed rail extension would be if in each of the maps provided about the alternatives for the rail route the preferred alternative of the Alaska Railroad Corporation was some how denoted. For example in the map of the Eielson alternatives one, two and three it would have been beneficial to have alternative three some how denoted as the preferred alternative. Secondly after reviewing the DEIS I was left with some questions I felt the current document did not cover. In section two, Proposed Action and Alternatives, section 2.3.4 about vegetation resources there is the statement that vegetation would be impacted "through the spread of noxious and invasive plants." I feel that this statement should have better language: it leaves me with the feeling that the Alaska Railroad Corporation is going to be intentionally bringing invasive species into the area. I think this could be fix with a small amount of rewording. The second question I had was about permafrost. There is some discussion in the DEIS about permafrost, but I wanted to know if there are going to be any issues with the rail tracks themselves melting the permafrost. Also will there be any problems associated with the settling of the tracks do to melting permafrost? This may lead to the need for repairs in the future and further damage done to the surrounding environment. My last concern is the amount of wetlands being filled in or changed because of the project. I know that this is unavoidable if the project goes through, and I hope that a lot of thought goes into which alternatives for the rail route damage the least amount of wetlands. Our wetlands are a valuable resource that should be seriously thought about when the final decision is made. Thank you for considering my comment in this process.	1 2 3 4

Comment Number: 8 Correspondence Information Docket #: FID 34658.0 Name of Sender: David J. Williams Date Received: 01/15/2009 Group: Date of Letter: 01/15/2009 Submitter's Comments To Whom It May Concern: The DEIS for the proposed Rail Line between North Pole and Delta Junction, Alaska, seems to be a decently put together document. I commend the amount of research used in regards to the wetlands and permafrost. However, while the possible impacts of the temporary construction camps on permafrost were discussed, mitigation measures were not. If mitigation measures are not feasible, that was not mentioned. In addition, I did not see anything dealing with the human waste from the temporary camps. The number to be employed was upwards of five thousand. Will the waste be disposed of onsite—and if so, what effect will that have on the wetlands? If it is taken offsite, how will it be transported, will that require heavy-duty roads, and what effect will that have on the permafrost and wetlands? Thank you for receiving my concerns. Sincerely, David J. Williams	
Comment Number: 9 Dear David Navecky, I am a graduate student at Alaska Pacific University studying Environmental Science with focuses in Hydrology and Ecology. I read over your Chapter 4 on Water Resources. I really liked that you included the impact bridges would have on the flow and sediment loads of the various rivers involved. As you stated in the DEIS, construction of the bridges would or might require channel access. I recently learned about the ability of large debris in rivers to change the flow and actually increase the amount of flow on the banks. This in turn could cause increased erosion from the change in flow direction. When building the bridges the location of piers in the river should be considered for potential to cause bank erosion or increase bank erosion. I understand from the document that you have considered the impact piers would have on sediment erosion rates, but considering pier location could decrease erosion. I think another consideration should be made to the activities taking place downstream of the project area. During construction of culverts and bridges sediment will be disturbed and transported downstream. Water use downstream at the time of year this project takes place could also be considered. If this were a time a year where downstream waters were frequently used and the increased sediment would interfere with fishing or fish spawning. This project could potentially temporarily change the water clarity or in the case of the larger bridges permanently change the clarity. Finally, changes in the overall river could be considered. Rivers are always changing and flowing down gradient. One of the streams in this project could change course or change the meander or direction of flow. So one thing to consider is the possibility that a bridge or culvert built in one spot does not mean the river or stream will stay in one spot. If there is potential for significant erosion to occur in the area a stream could be more likely to move or change over time. Thank you for the opportunity to review and comment on the project. Sincerely, Katie Trifone	

Comment Number: 10 David Navecky or whomever it may concern, I have a few comments about the DEIS for the Alaska Railroad Corporation- Rail Line between North Pole and Delta Junction, Alaska. These comments and concerns are from the perspective of a concerned citizen as well as from a student of both geology and biology; therefore, these comments are focused mainly upon the geologic aspects (chapter three) of the DEIS. First I would like to say that the terminology used throughout the DEIS, with the exception of a few words here and there, was very good; any one reading this would understand 99% of what was stated without any prior knowledge. In addition there were many topics covered that were high on my checklist including: the angles of the slopes, general topography, and the type of materials (soils, sediments, bedrock et cetera) and other things. I commend you for those points which I feel are pertinent, the following are items that I think believe should be covered but were not addressed. I apologize if this gets technical. One of the topics I would have liked to have seen covered was the angles of the bedding (ie it bedrock, sediments or soil) and how parallel the bedding is in relation to the slope angle. The reason this is a concern is because if bedding materials are parallel and the angle of the bedding is close to the angle of the slope then there is an inherent risk of a slump (a mud, earth or rock slide). A slump could be caused by numerous factors including water between the sediments, extra weight, lack of vegetation to anchor the sediments and earthquakes or a combination of these factors. Slumps could damage the track and in turn could harm passengers or at least put the passengers at risk. Another aspect I would like to see covered is the averages for the floodplains that are parts of the proposed segments; meaning, are they five year floodplains, ten year or one hundred year floodplains. Personally I would not like anything to be built on because there are so many risks involved. Silts and clays simply don't make a good base for ballasts because they are prone to compressing, holding water and many other things. The final topic I would like to see covered or at least see proof that it has been considered is the amount of vegetation on all the slopes and how ARC plans to replace any vegetation that uprooted. Vegetation is vitally important to slope stability, proper run-off and drainage patterns as well as important to wildlife in the area. That concludes my comments and concerns about the DEIS. I feel that this has been very well done and I would like to thank everyone who has put so much time and effort into this long process. Thank you and I have faith that everything will work out well. Sincerely, Sarah Gouwens	Comment Number: 11 Correspondence Information Docket #: FD 34658 0 Name of Sender: Leonard Jewkes Date Received: 01/25/2009 Group: Date of Letter: 01/25/2009 Submitter's Comments Alaska Railroad Corp Proposed Northern Rail Extension Additional studies of this project should be completed before any decision is made. It's affect on the fish and game resources in the area will be enormous. The ROW that's proposed is a main migration route for moose that travel to and from the foot hills on the north side of the Tanana and the Tanana Flats, thus creating numerous encounters with railroad equipment. The ROW would also run alongside and cross many streams and rivers that are local fish habitat, salmon spawning and water fowl areas. Because of the popularity of the Tanana Flats as a hunting, fishing and recreational area there will be may ROW issues. The ROW will span 100 miles of the Tanana Flats. Additional issues such as private land ownership, safety, and hazardous materials and waste should be addressed. I am opposed to this project.
Comment Number: 10 David Navecky or whomever it may concern, I have a few comments about the DEIS for the Alaska Railroad Corporation- Rail Line between North Pole and Delta Junction, Alaska. These comments and concerns are from the perspective of a concerned citizen as well as from a student of both geology and biology; therefore, these comments are focused mainly upon the geologic aspects (chapter three) of the DEIS. First I would like to say that the terminology used throughout the DEIS, with the exception of a few words here and there, was very good; any one reading this would understand 99% of what was stated without any prior knowledge. In addition there were many topics covered that were high on my checklist including: the angles of the slopes, general topography, and the type of materials (soils, sediments, bedrock et cetera) and other things. I commend you for those points which I feel are pertinent, the following are items that I think believe should be covered but were not addressed. I apologize if this gets technical. One of the topics I would have liked to have seen covered was the angles of the bedding (ie it bedrock, sediments or soil) and how parallel the bedding is in relation to the slope angle. The reason this is a concern is because if bedding materials are parallel and the angle of the bedding is close to the angle of the slope then there is an inherent risk of a slump (a mud, earth or rock slide). A slump could be caused by numerous factors including water between the sediments, extra weight, lack of vegetation to anchor the sediments and earthquakes or a combination of these factors. Slumps could damage the track and in turn could harm passengers or at least put the passengers at risk. Another aspect I would like to see covered is the averages for the floodplains that are parts of the proposed segments; meaning, are they five year floodplains, ten year or one hundred year floodplains. Personally I would not like anything to be built on because there are so many risks involved. Silts and clays simply don't make a good base for ballasts because they are prone to compressing, holding water and many other things. The final topic I would like to see covered or at least see proof that it has been considered is the amount of vegetation on all the slopes and how ARC plans to replace any vegetation that uprooted. Vegetation is vitally important to slope stability, proper run-off and drainage patterns as well as important to wildlife in the area. That concludes my comments and concerns about the DEIS. I feel that this has been very well done and I would like to thank everyone who has put so much time and effort into this long process. Thank you and I have faith that everything will work out well. Sincerely, Sarah Gouwens	Comment Number: 11 Correspondence Information Docket #: FD 34658 0 Name of Sender: Leonard Jewkes Date Received: 01/25/2009 Group: Date of Letter: 01/25/2009 Submitter's Comments Alaska Railroad Corp Proposed Northern Rail Extension Additional studies of this project should be completed before any decision is made. It's affect on the fish and game resources in the area will be enormous. The ROW that's proposed is a main migration route for moose that travel to and from the foot hills on the north side of the Tanana and the Tanana Flats, thus creating numerous encounters with railroad equipment. The ROW would also run alongside and cross many streams and rivers that are local fish habitat, salmon spawning and water fowl areas. Because of the popularity of the Tanana Flats as a hunting, fishing and recreational area there will be may ROW issues. The ROW will span 100 miles of the Tanana Flats. Additional issues such as private land ownership, safety, and hazardous materials and waste should be addressed. I am opposed to this project.

Comment Number: 12

WCA WHITESTONE COMMUNITY ASSOCIATION

PHONE: (907) 885-4958 FAX: (907) 885-4287 P.O. Box 4620 Delta, AK 99577

January 15, 2009

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

Dear Mr. Navecky,

The Whitestone Community Association (WCA) has received the recent Draft Environmental Impact Statement (EIS) published by your department on the Alaska Railroad Corporation's (ARRC) proposed Northern Rail Extension (NRE) project. WCA has been following the progress of this proposed project since late 2005. After review of the Draft EIS, WCA will support it.

Whitestone Community Association represents the rural community of Whitestone which is comprised of roughly 200 individuals and located on the south-western corner where the Delta River joins the Tanana. As depicted on Map Area 5 (Figure S-6 in the Draft EIS) the South Common Segment passes directly through the corner of WCA's territory and across land owned by Whitestone Farms, a local business. Whitestone Community Association has always been isolated from the current highway system by two rivers, and would stand to reap considerable benefits from an accessible year-round transportation system. Regardless of the obvious advantages to the community, members have given considerable thought to all the potential ramifications of this project and are still in favor of it.

WCA members developed the following non-exhaustive listing of materials that they routinely have to transport to and from the community.

- Feeds and fertilizers
- Heavy equipment
- Small vehicles
- Perishables/food stuffs
- Cattle for slaughter
- Fuels and lubricants
- Fabrication materials: aluminum and steel
- Hardwoods
- Building supplies for use in both the private and public sectors
- Road construction materials
- Recreational vehicles: ATVs, snow machines and boats

01/15/2009

WCA Comment on STB's Draft EIS, FD#: 34658

Page 1 of 2

Comment Number: 12 (continued)

2

Currently these materials are hauled to and from the community in boats (summertime) and on ice bridges across the Delta River (wintertime). WCA and its members are committed to protecting the environment at all times including during material transport. However, certain aspects of the current modes of transportation elevate the potential for damage to the environment. WCA believes that if these same materials could be moved via rail on more permanent infrastructure, the potential for environmental damage could be mitigated.

Comment has been presented about civilian travel to and from Fairbanks and Anchorage as a way to reduce travel expenses. The local school has inquired about commuter service to and from Anchorage in order to compete in forensics tournaments held in Anchorage several times during the school season, as well as field trips to Fairbanks and Anchorage.

The area around WCA has always been a prime subsistence hunting destination. There is some concern within the community that the rail bridge across the Delta River will make access to this region easier and potentially overwhelm the area with more hunters than there is game to support. However, since there are no current plans for a vehicle-accessible bridge over the Delta River, we believe that there will not be a large enough increase in hunting to warrant concern.

3

The beef and dairy farmers in the WCA area commented on the need for transporting cattle by rail to and from slaughter houses. In the last three years, Whitestone Farms has constructed for and completed a herd expansion from roughly 30 head of cattle to the present 150 head. Since local slaughter facilities are not capable of handling the current load, they would benefit from a reliable mode of transporting cattle to and from slaughter houses.

4

Local crops of hay and haylage are currently trucked between November and March across the Delta River on the ice road. The farmers selling these crops commented that they are excluded from important sales opportunities in Fairbanks, Palmer, Wasilla, Seward and Anchorage between the months of April and September because there is no safe, economical way to transport them over the rivers during this period.

In conclusion, local community leaders and business people have stated their support for the NRE and share the common view that rail hauling and transportation would have a positive impact on the economic status and environmental friendliness of our community. The NRE could have a favorable environmental impact on WCA and the surrounding communities as fewer hazardous products would need to be transported on the Tanana and Delta Rivers.

Sincerely,


Steve Salvaggio
President, WCA

01/15/2009

WCA Comment on STB's Draft EIS, FD#: 34658

Page 2 of 2

Comment Number: 13 Correspondence Information Docket #: FD 34658 0 Name of Sender: Eric Stenberg Date Received: 01/24/2009 Group: Date of Letter: 01/24/2009 Submitter's Comments 1 I think that it is important to extend the rail to Big Delta to improve the countries ability 2 to move men and materials for our National Defense System. Long term the rail line should be continued to the Canadian Boarder and connected to the Canadian Rail System. The project as proposed addresses the concerns of protecting the fish and wildlife of the area as well as addressing the problem of the flooding concerns of the Salcha residents. One of the proposed routes directly affects my property on the Old Richardson but this does not change my opinion of this much needed project. This is a sound project and should be approved for construction. I have been in Alaska since 1949, moved to Salcha in 1975 to raise my family and have had to deal with the flooding issues from the day we moved in, but that is what living the "Alaskan Experience" is all about. Thank you for providing this forum for me to express "my opinion" as it is probably the only thing I am an expert on. Eric Stenberg	Comment Number: 14 Correspondence Information Docket #: FD 34658 0 Name of Sender: Rachel Curtis Date Received: 01/25/2009 Group: Date of Letter: 01/25/2009 Submitter's Comments Preferred Routes: S.3.8 No Action Alternative is my preference. I have yet to see any documented proof of economic feasibility for this project. In addition to this, every single person that I have talked to, in every community that would be affected by this rail route, have expressed this same view. I have yet to speak with one single individual from these communities, who is in favor of this project. Questions I do not feel have been properly addressed include, but are not limited to: 1. What would draw the tourist to Delta Junction compared to the already existing rail line to Mt McKinley Park and on to South Central Alaska? I have lived in Alaska for 28 years, consider this to be the most beautiful place on earth, travel extensively around the state as a "tourist" but honestly do not see Delta Junction as a tourist attraction. The few things that might be of interest could already be observed by the existing rail line; mountains, the pipeline, agricultural areas, vast open spaces, glacier fed river. 2. Would agriculture transport be economically comparable to trucking? What about military transport? These are two of the main reasons cited for basis for this project, but I am concerned that the cost of the project and the maintenance would make the use of such facilities cost prohibitive for these uses. 3. Is the military going to be financially responsible for a portion of the railroad? If so, what happens if the military bases that this railroad supplies, closes down, as they have been slated to do in the previous base closures by our government? Will this bring the cost of maintaining this line to rest solely on the citizens of our state? 4. Has there been any documented proof that commuter trains are needed along this route? How many commuters are expected to ride this line each day? At what cost per person per ride? Would it be economically comparable to driving? During the many years that I have lived in this area, including 8 years working with the public at Salcha Store, I have seen different commuter resources along this same route come and go, forced out of business by lack of business, most times the commuter vans that serviced this route came by empty or with just a couple passengers riding. 1
---	--

Comment Number: 14 (continued)	2. Moose calving areas, what studies have been done to minimize the affects of the rail line on these animals during this critical point in their lives? This is a major concern for those of us who use moose meat as our primary meat source and also for those who enjoy the beauty of this great beast and do not want to see them harmed needlessly. 3. Noise pollution for trail crossings, it is my understanding that the train will have to blow its whistle for each legal rail crossing, including trail crossings. If the rail line Central Alternative #1 is chosen, I foresee the line crossing our trail system a minimum of 4 times in as little as ½ mile stretch. If even as little as 5 trains a day use this rail line, that is 20 train whistles within ½ mile each day. If you have ever stood outside all alone, in the wilds of Alaska, you would know that sounds travel a great distance, and this amount of sound would indeed be a huge amount of noise pollution that is not being taken into consideration.	
Comment Number: 14 (continued)	5. In our current state of economic times, is this really the best way to spend government funds? Have you ever heard of the fiasco "The Bridge to Nowhere?" This project, I feel is "The Rail to Nowhere" and I feel equally ashamed of the wastefulness of this project. 6. Concerns about access to recreational areas, by water craft, wheeled vehicles, dog teams and snow machines need to be treated as a major concern for all. These forms of access have been a tradition before you and I walked this earth, and need to be allowed to continue unhindered. Other than my strong vote for the above option, if I had to choose an existing proposed route, the following would be my preferred route. 1. North Common Segment-No comment or concerns 2. Etelson Alternative Segment-No comment or concerns 3. Salcha Alternative Segment #1-I feel that Salcha Alternative Segment #2 would adversely affect the citizens of Salcha, through increased noise, adverse anesthetics, the loss of personal property and the adverse affects on Salcha School, Salcha Ski Trails and the Historic Satchaket Indian burial site. 4. Connector B-This route directly affects my families access to our privately owned recreational cabin on Five-Mile Clear Creek and I am seeking confirmation that this access will be available to all forms of watercraft at all times. I am also concerned that small streams are going to be blocked or dammed, resulting in a lack of adequate water flow into Five-Mile Clear Creek. 5. Central Alternative #2-Central Alternative #1 runs between our recreational cabin on Five-Mile Clear Creek and our moose hunting area. According to your maps, it actually runs right through our moose hunting area, and is affecting an existing trail system that we have cleared and maintained for over 25 years. These trails are not only used for hunting, but for extensive recreational use 6 months out of the year, by not only me and my family, but also by many other users as well. In addition to this, these trails have been traditional used for trapping during the winter months. Access to these trails and beyond are a prime concern for those of us who use this vast trail system. 6. Donnelly #2-No comment or concerns 7. South Common Segment-No comment or concerns 8. Delta #1-I feel that the Delta #2 segment would have an adverse affect on the Delta Junction area by way of increased noise, adverse anesthetics and the loss of personal property.	Environmental concerns that I have for this project include: 1. Salmon and grayling migration and spawning streams, how will these issues be addressed? These issues are stated in the Draft Environmental Impact Statement for this project, but I would like confirmation that these issues are going to be properly addressed before approval is given for this project to ensure that these great resources of our state are not adversely affected in any way.

Comment Number: 15 Correspondence Information Docket #: FD 34658 0 Name of Sender: Kristy Howk Date Received: 01/26/2009 Group: Date of Letter: 01/26/2009 Submitter's Comments I feel the Eielson Alternate 3 extension of the railroad would be the best for all involved. It is closer to the Hwy and would make less impact to those who have made their homes here in the Eielson Farm area. Thank you, Kris Howk 1	Comment Number: 16 Correspondence Information Docket #: FD 34658 0 Name of Sender: Murray E Howk Date Received: 01/26/2009 Group: Date of Letter: 01/26/2009 Submitter's Comments I believe the best location for the railroad extension would be Eielson alternate 3. This will keep the railroad closer to the Richardson Hwy and Eielson Air Force Base. 1
--	---

E1-16318

Redd 1/26/09

Comment Number: 17

Dear Ms. Victoria Rutson
Chief, Section of Environmental Analysis.

I thank you for sending your draft environmental impact statement for the construction and operating of the rail line from North Pole Alaska to Delta Junction, Alaska, so I could review and make comments.

For the record, I own a two and one half acre lot in the Old Valdez Estates subdivision along the Selcha River.

My preference for the route is as follows:

1. North common segment * See recommendation for alignment changes below.
2. Eielson 3 segment * See recommendation for alignment changes below.
3. Eielson 2 and 3 segment
4. Selcha 1 segment
5. Connector A segment
6. Central Alternative 1 segment
7. Donnelly 1 segment
8. South Common segment
9. Delta 1 segment.

* Recommended changes in alignment.

1. North Common segment and Eielson 3. should be incorporated into the existing rail line serving Eielson Air Force Base. This existing line then should be extended into Eielson 2 and 3 segments just before they join Selcha 1 segment prior to crossing the Tanana River.

The reasoning for this change is to move the railroad line away from watercourses as much as possible. Wildlife live mostly along running streams and sloughs and this change would reduce the impact on existing wildlife.

I strongly feel that the Airbase should cooperate in helping save as much wildlife habitat and manage the wildlife along this segment of the project. The rail line already exists and would have a very small impact on Eielson Air Force Base and security can be managed whereas the impact on wildlife can not be fully mitigated. It is arrogant no-brainer to locate the rail line along waterways when an existing rail line can be utilized that would greatly reduce the impact on wildlife.

Should the Air Force refuse to allow the use of the existing rail line, then a new route should cross the Tanana River just south of North Pole and run through the Tanana Flats Training Area. The rail line should be constructed so as to cross

Comment Number: 17 (continued)

flowing rivers and not run alongside flowing rivers and sloughs as much as possible.

S.6.3 Biological Resources

Wildlife, Fisheries, Bird and Predators.

Where the rail line crosses waterways that have running water or sloughs that have standing water, trusses/bridges should be constructed wide enough and tall enough so wildlife can pass under the rail line. It will be necessary to maintain the trees and vegetation as much as possible and not clear a right away on both sides of the rail line at these trusses/bridges. As these areas will constrain the wildlife at these points, hunting, trapping and other human activities must be controlled so as not to impede the wildlife movements. The rail line right-of-way should be fenced and game passage ways provided at least every 1/4 mile intervals. These passageways under the rail line would greatly reduce train-moose collisions mentioned in S.6.5.

S.6.13 Socioeconomics

I have been visiting Alaska over the last 15 or so years during the summer. The pristine Alaska I first visited has greatly been commercialized and Fairbanks, Selcha and Delta Junction have greatly increased its human population. Therefore, please clearly understand that when this project is started every modification to existing roads, pipelines, trucking routes, power lines storage facilities will have an enormous negative effect on air quality, water quality and will further decrease wildlife and fish habitat. The impact on the construction site is small compared with the entire human impact that follows each and every stage of the project that is developed.

Another area of impact that needs to be discussed is the impact that occurs when these developments bring an influx of people into the state to construct this project. It will impact the entire state road system, rail system, airlines and increase auto and truck traffic. These additional people cause further degrading of the environment. These new people require homes to live in, which must be built, new sewer and water systems and new power and phone lines. Because the old roads will not be adequate to handle the increased traffic, they must be rebuilt or new ones constructed. New schools, new business, more policemen, more county employees and the entire infrastructure must be enlarged to meet the new demand. The increase in service and industrial industries that is necessary brings more demands on the environment. Also, the local population will be hit with a large tax increase to fund all these amenities.

Also, you have not discussed or taken into account that this enlarged population

E1-16319
Redd 1/26/09

743 Chena Hot Springs Rd.
Fairbanks AK 99712
January 14, 2009

Comment Number: 18

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Dear Mr. Navecky:

I recently attended a public meeting to discuss the draft EIS in North Pole, Alaska. I offer the following comments:

- 1) The document should look at other alternative routes which would have less impact on the residents. For example, on the Fairbanks end place the line in the existing transportation corridor and move the line south of the river just after leaving Eielson. Or better yet, move the line to the south of the Tanana River immediately before the Chena River Overflow. This would provide for far fewer impacts on the public and "human" environment. The government ground on the north and south side of the river is a perfect place for a government railroad as it would require no private land "taking".
- 2) The Flats are highly used by Alaskans including recreationalists, hunters, trappers and snowmobile operators. The document doesn't show adequately the existing game trails, foot trails, RS2477 trails or vehicle trails including ATV trails, swamp buggy trails, snowmachine trails and aircraft trails that will be negatively impacted by the construction and operation of a railroad. There are so many trails accessing the Flats for ice fishing, accessing cabins, accessing private property, hunting and trapping. I am concerned that so few trails are shown in the document, even some major ones have been left out. Mitigation could be through the use of undercrossing "tubes" and guidance fencing every couple of miles or overcrossings. These crossings should be large enough to accommodate "vessel" type tracked vehicles, aircrafts, four-six- and eight-wheel ATV's and snowmachines that commonly access the flats across the proposed rail lines. These protected crossings would also help reduce the number of moose killed by the trains.
- 3) The clear creek just upstream from Flag Hill on the south of the Tanana River is not appropriately depicted. I feel that this stream flows as much water as the Little Satcha, yet it doesn't even show up on the plates in the summary, see page Summary page S-7 Figure S-4. This stream is ground water fed. It runs year round, builds shelf ice but doesn't freeze up. I am concerned that the connections shown, namely "Connector E" or "Donnelly 2" will cause irreparable, inmitigable damage to this water body. The lines go directly through the area responsible for the flow of this stream. This stream supports silver salmon,

Comment Number: 17 (continued)

demands more areas for recreation, which means they operate snow machines, all terrain vehicles, motorcycles, boats, campers, motor homes, pickup trucks plus most of these new workers and their families all will want to fish and hunt in Alaska. These impacts will not occur on the construction site but the gasoline and diesel they utilize will pollute the air and water and have an enormous negative effect on Alaska's big game wildlife, fish, small game and upland birds

There is a simple rule of thumb that must be taken into account, which states that for every permanent job that is created there are thirteen service and industrial jobs that must be planned for and the impact on the environment mitigated.

I could not find one paragraph in the draft environmental impact statement where these concerns were discussed or measures were outlined to mitigate the damages that will occur from the overall human impact should this project be approved and constructed.

Hopefully, you and your staff will address these concerns and amend the EIS to mitigate accordingly.

Sincerely,

James H. Brannan
James H. Brannan

Comment Number: 19

E1-16320



SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Draft Environmental Impact Statement for the
ALASKA RAILROAD CORPORATION'S
PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address incorporated on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov/>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name:	Ronald BLESS
Address:	PO Box 140041
City, State, Zip:	SALCHA ALASKA 99714
Phone:	
Email:	

What comments do you have about the Draft Environmental Impact Statement?

I would like to see something about noise abatement in the 5 mile cant
 to Richardson Creek. The areas there are grade canal areas and should not be subject to noise pollution. Also I feel you are restricting my access to the Tanana River south of the R.R.

Comment Number: 18 (continued)

grayling and white fish, many fowl and terrestrial creatures. If the rail bed disrupts the flow of ground water to the stream, the impacts will be dramatic; it could dry up this stream. The rail bed could create a freeze bulb which could act as a subterranean dam cutting off the flow to the stream. This resource needs to be protected. There are so few accessible clear water streams south of the Tanana to adversely impact one should be avoided. A more southern route could eliminate this impact. A bridge constructed over the head waters should minimize the flow impacts.

4) The proposed lines on the south side of the river need to accommodate the migration of moose. The Tanana Flats contains the highest density of moose in Alaska. Many people subsist thus depend on the protein provided by the Flats. Moose crossing areas need to be identified, much like the signed moose crossing areas along our highways. Crossing "tubes" or "overcrossings" should be provided to reduce the number of moose kills along the corridor.

5) I'm concerned that access to what I call Clear Creek (5 mile Clear Creek?) will be negatively impacted by Central Alternative 2/Donnelly2. If the preferred alternative is a rail line that runs parallel to and between the Tanana River and Clear Creek the access waterway, which is a side slough of the Tanana River (southern edge) about Flag Hill that is used to access Clear Creek, may be eliminated with dikes or other river training structures or possibly by the rail bed itself. If the Central/Donnelly2 is chosen as the preferred alternative, some construction ditching to create an adequate navigable channel and along with a requirement for the railroad to maintain the channel should be required. The Salcha crossing and the most southern rail route would eliminate these conflicts.

6) I understand on page S-1 in the Summary the purpose of the project but the need is not well enough defined. The Richardson Highway is a 24/7 facility. I think classified as "Interstate". I also believe the traffic volumes are low with no congestion within the rail project boundaries. To imply that the highway is not a dependable year-around facility and is affected by inclement weather is not correct. I'm not aware of it being closed by weather in the last 25 years. The primary commercial freight generators at present are "south" of this project, like the coal fields and oil refinery and the primary users, like Eielson, Wainwright, Anchorage and Fairbanks already have an adequate rail connection. To promote most likely a billion dollar project to provide public transit where the demand is essentially non-existent or increase tourism where there is really no attraction seems a bit thin. I suggest you re-evaluate the need for this project or at least restate it in the final EIS. Perhaps all that is really required at this time is a bridge across the Tanana for military access to their training grounds; in fact that is the real "Need".

Thank you for this opportunity to comment.

Sincerely,


 Michael D. Gavin

Comment Number: 20



ALASKA MINERS ASSOCIATION, INC.

3302 Arctic Blvd., #105, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9228 • www.alaskaminers.org

E1-16321
Red

January 19, 2009

Mr. David Navecky
Finance Docket No. 34658
Surface Transportation Board
395 E. Street S.W.
Washington, D.C. 20423-0001

Electronic comments: www.stb.dot.gov

RE: Draft EIS for STB Finance Docket No. 34658 – Alaska Railroad Corporation Construction and Operation of a Rail Line Between North Pole and Delta Junction, Alaska

Dear Mr. Navecky,

Thank you for the opportunity to provide comments on the DEIS for the proposed ARR extension between North Pole and Delta Junction, Alaska. The Alaska Miners Association strongly supports this project which we believe will have positive impacts upon the economic viability of existing and proposed mineral resource development projects in portions of interior Alaska.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, uranium, etc. Our members live and work throughout Alaska and many have substantial interests in identification and development of mineral resources in the eastern interior portions of Alaska where significant precious and base deposits have been identified.

AMA strongly supports the proposed project and generally agrees with the applicants' preferred segments as identified in Table S-1 with two important exceptions. We do not support Connector B or Central Alternative 2. Unless these segments are significantly lower cost alternatives, they should be replaced with Connector A and Central Alternative 1.

Connector B and Central 2 are much closer to the Tanana River. These segments just barely skirt the various braids of the Tanana. The Tanana River is known for flooding and for being a major braided river system. From one year to the next the river can move to new areas within the floodplain and over longer time it can make major changes. By locating the railroad so close to the river it is almost certain that over time the railroad will be threatened by the movement of the river. The result will be significant cost to protect the railroad. The Richardson Highway is the prime example of the problems this river creates. Following Connector A and Central 1 would effectively eliminate this hazard.

Comment Number: 20 (continued)

Another benefit of following Connector A and Central 1 would be improved access for military. Rail sidings and unloading areas would be further from the river and on higher ground.

Thank you for the opportunity to comment on this issue. **We urge that a final EIS and record of decision be issued at the earliest possible time so this project can become part of the government economic stimulus package.**

Sincerely,

Steven C. Borell, P.E.
Executive Director

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sarah Palin

Comment Number: 21

E1-16322



SURFACE TRANSPORTATION BOARD
 Section of Environmental Analysis
 Draft Environmental Impact Statement for the
 ALASKA RAILROAD CORPORATION'S
 PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name:	MICHAEL E. LEUKHUIS
Address:	P.O. Box 1263
City, State, Zip:	Delta Jct, AK 99737
Phone:	(907) 865 2250 (907) 388 7925
Email:	

What comments do you have about the Draft Environmental Impact Statement?

I AM IN Support of ARC Northern Rail
 EXTENSION.
 AS IT would benefit Fort Greely and Delta
 Junction AREA
 AWESOME AK R/R
 Mike Lane

Comment Number: 22

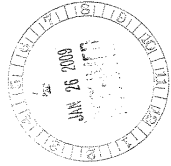
E1-16325

MAYER BROWN

Mayer Brown LLP
 1903 K Street, N.W.
 Washington, D.C. 20006-1101

Main Tel (202) 263-3000
 Main Fax (202) 263-3000
www.mayerbrown.com

Kathryn Kuske Floyd
 Direct Tel (202) 263-5223
 Direct Fax (202) 263-5223
kuskefloyd@mayerbrown.com



January 26, 2009

Victoria Ruson

Chief

Section of Environmental Analysis

Surface Transportation Board

395 E Street, SW

Washington, DC 20423-0001

Re: Finance Docket No. 34658, Comments of the
 Alaska Railroad Corporation on the Northern Rail
 Extension Draft Environmental Impact Statement
 Section 4(f) Evaluation (Appendix M)

Dear Ms. Ruson:

Thank you for providing our client, the Alaska Railroad Corporation (ARRC), with the opportunity to review and comment on the *Northern Rail Extension Draft Environmental Impact Statement* (DEIS). We plan to submit formal comments on the entire document at a later date. This letter addresses ARRC's immediate concerns regarding the DEIS Section 4(f) Evaluation (Appendix M). As you know, Section 4(f) of the Department of Transportation Act does not apply to Surface Transportation Board (STB) actions. It is, however, applicable to the proposed Northern Rail Extension project through the involvement of the Federal Railroad Administration (FRA) and the Federal Transit Administration (FTA).

Since the DEIS was published, ARRC has gathered information about the properties described in the Draft Section 4(f) Evaluation that may not have been fully considered during the preparation of that document. Based on this information and additional legal research, this letter raises several concerns about the DEIS's identification of Section 4(f) resources, de minimis impacts to those resources, and the applicability of archeological resource guidance. We think that the discussion below will prove valuable as the Board finalizes its Section 4(f) Evaluation, and ask that ARRC's views be incorporated into the final document where appropriate.

Identification of Section 4(f) Resources

ARRC's initial concern is that certain properties not qualified for protection under Section 4(f) have been identified in the DEIS as Section 4(f) resources. Under Section 4(f), protected resources include publicly owned parks, recreation areas, or wildlife or waterfowl refuges or any publicly or privately owned historic sites. See 49 U.S.C. § 303(c). Federally-funded transportation programs and projects may use these lands only if "there is no prudent and feasible alternative" to such use. *Id.* In cases where the use of Section 4(f) resources cannot be

Mayer Brown LLP operates in combination with our associated English limited liability partnership and Hong Kong partnership (and its associated entities in Asia).

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Ruisson
January 26, 2009
Page 2

avoided, the project must include "all possible planning to minimize harm" to these protected areas. *Id.* Regulations recently promulgated by the Federal Highway Administration (FHWA) provide further guidance regarding the application of Section 4(f). See 23 C.F.R. § 771.135. As explained below, our specific concerns in this instance involve the application of Section 4(f) to Alaska Department of Natural Resources (ADNR) Dispersed Use Areas, the Chena Lakes Flood Control Project, the Eielson Air Force Base (AFB) Outdoor Recreation Area, and certain trails (ADNR Forestry Winter Road, U.S. Army Permit Route, Koolo Lake Trail and Domnelly-Washburn Trails, and Silver Fox Lodge Trail).

Dispersed Use Areas

DEIS Appendix M points out that "[a]reas where dispersed recreation takes place represent the vast majority of lands that would be crossed by the proposed project and its alternatives." DEIS at M-20. These parcels include thousands of acres at many points along various segment alternatives. See *id.* Appendix M goes on to note that Section 4(f) protects "includes areas that have been officially designated an important recreational resources or have recreational activities as primary uses"—without deciding one way or the other whether the "Dispersed Use Areas" crossed by the project meet these criteria. We believe that a closer examination of these Dispersed Use Areas will show that their protection lies far beyond the intent of Section 4(f).

In 2005, FHWA published a Section 4(f) Policy Paper that included the following Questions and Answers addressing the applicability of Section 4(f) to various types of land and resources.

2

2. Public Parks, Public Recreation Areas and Wildlife and Waterfowl Refuges

Question A: When is publicly owned land considered to be a park, recreation area or wildlife and waterfowl refuge and who makes this determination?

Answer A: Publicly owned land is considered to be a park, recreation area or wildlife and waterfowl refuge when the land has been officially designated as such by a Federal, State or local agency and the officials of these governmental entities, having jurisdiction over the land, determine that one of its major purposes and functions is for park, recreation or as a refuge. Incidental, secondary, occasional or dispersed park, recreational or refuge activities do not constitute a major purpose

* * * *

6. Public Multiple-Use Land Holdings

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Ruisson
January 26, 2009
Page 3

Question: Are multiple-use public land holdings (e.g., National Forests, State Forests, Bureau of Land Management lands, etc.) subject to the requirements of Section 4(f)?

Answer: Section 4(f) applies to historic properties (those on or eligible for the National Register of Historic Places) located on these multiple-use land holdings and only to those portions of the lands which are designated by statute or identified in the management plans of the administering agency as being primarily for park, recreation, or wildlife and waterfowl refuge purposes, and determined to be significant for such purposes. For example, within a large multiple-use resource, like a National Forest, there can be areas that qualify as 4(f) property (e.g. a campground, picnic area, etc.) while other areas of the property function primarily for purposes other than park, recreation or refuges. Coordination with the official having jurisdiction and examination of the management plan for the area are necessary to determine Section 4(f) applicability. For public land holdings, which do not have management plans or existing management plans are out-of-date, Section 4(f) applies to those areas that are publicly owned and function primarily for 4(f) purposes. Section 4(f) does not apply to areas of multiple-use lands which function primarily for purposes other than park, recreation or refuges such as for those areas that are used for timber sales or mineral extraction in National Forests.

2

FHWA Section 4(f) Policy Paper (March 1, 2005) at 11-12, 17. The conclusions reached in the 2005 Policy Paper are reinforced in FHWA's Section 4(f) implementing regulations, which specify that when lands are "managed for multiple uses, Section 4(f) applies only to those portions of such lands which function for, or are designated in the plans of the administering agency as being for, significant park, recreation, or wildlife and waterfowl purposes." 23 C.F.R. § 771.135(d).

The Dispersed Use Areas discussed in DEIS Appendix M are owned and managed by ADNR. They are located within an area covered by the Tanana Basin Area Plan, which was adopted by ADNR in 1985 and last updated in 1991, 18 years ago. Our position is that these areas' management plan is "out-of-date," and, therefore, that Section 4(f) applies only to the extent those areas "function primarily for 4(f) purposes." *Id.* at 17 (emphasis added). The DEIS notes that the specific management submittals at issue here are 7F1, 7G2, 7G3, and 7I2 within Delta-Salcha Subregion. In our view, the following information from the Tanana Basin Area Plan verifies that these lands do not "function primarily for Section 4(f) purposes." Rather, recreation is merely one of a variety of uses:

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Rutson
January 26, 2009
Page 4

- **Management unit 7F.** Primary surface uses for subunit 7F1 are wildlife habitat, forestry, and public recreation; in other words, recreation is only one of several primary uses. Moreover, the plan specifies that "[t]he Alaska Railroad extension shall remain as a reserved use corridor, 300 feet in width." (page 3-220)
- **Management unit 7G.** Primary surface uses for subunit 7G2 are agriculture, wildlife habitat, forestry, and public recreation. Primary surface uses for subunit 7G3 are watershed, wildlife habitat, and public recreation. Recreation is only one of several primary uses in both 7G2 and 7G3. Again, the plan states that "[t]hroughout this unit, the Alaska Railroad extension shall remain as a reserved use corridor, 300 feet in width." (page 3-221 to 3-222)
- **Management unit 7I.** Unlike management units 7F and 7G, the plan designates public recreation as the primary use in Subunit 7I2. And although the Alaska Railroad extension is not specifically mentioned in connection with unit 7I, the plan states that "[t]ransportation and pipeline corridors are key elements in this management unit." (page 3-224)
- Other portions of the plan also emphasize the importance of transportation uses: "The design of an efficient transportation system is key to resource development and is a major determinant of land use patterns within the Tanana Basin. No attempt is made to identify actual routes of proposed roads and railroads. However, potential general transportation corridors have been identified. These corridors are designed to help resource development, increase opportunities for public recreation and tourism, and open land for settlement." (page 4-11)
- Finally, the plan touts the benefits of what is now known as the Northern Rail Extension: "An extension of the Alaska Railroad from Fairbanks would provide access to the Delta Belt mineral area and could provide a connection to Canada. . . . A route has been identified through the Tanana Basin. . . ." (page 4-12)

Based on this information, there can be no dispute that a rail corridor through the area is wholly consistent with the Tanana Basin Area Plan. Because of this, the properties in the Dispersed Use Areas should not receive blanket Section 4(f) protection. We believe it is more consistent with the plan—and with Section 4(f)—to protect specific recreational trails within these Dispersed Use Areas. Section 4(f) regulations require a closer inspection of the function of the particular affected portion of the lands at issue. Indeed, it would be inconsistent with the Plan to consider vast swaths of land as a Section 4(f) simply because recreational use is designated as one of several primary uses in these areas.

Chena Lakes Flood Control Project Management Units 12 and 14

The Chena Lakes Flood Control Project functions primarily as part of a USACE flood control project. It includes portions of the Chena River Floodway and its southern levee, which protect the City of Fairbanks from flooding. The flood control project includes approximately 20,000 acres at the northernmost section of the proposed project area. According to DEIS Appendix M, the project would affect just 14.3 of these 20,000 acres.

3

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Rutson
January 26, 2009
Page 5

In non-flood periods, portions of the Chena Lakes Flood Control Project area are used for public recreation, accommodating a variety of trail-based recreation activities. These areas include a portion of the Fairbanks North Star Borough (FNSB) 100-mile Loop Trail that follows a braided path through the floodway area. There are also specific areas designated for recreational use within the Chena Lakes Flood Control Project, including the FNSB Chena Lake Recreation Area and the Moose Creek Dam Bikeway. We do not disagree that these specific recreational areas within the Chena Lakes Flood Control Project warrant protection under Section 4(f). But we do not believe the entire area should be considered a Section 4(f) resource, because its primary use is not recreational.

Eielson AFB Outdoor Recreation Area

The DEIS has identified two areas on Eielson Air Force Base (AFB) as Section 4(f) resources: the Twentythreemile Slough Trails and the Eielson Outdoor Recreation Area. The trails, maintained by the Salcha Dog Mishers Association, are largely located throughout the Eielson Farm District, with one trail entering Eielson AFB on a slough. The maintenance and use of the slough for trails purposes is subject to permit by Eielson AFB and must be renewed on an annual basis.

The Eielson Recreation Area is located amongst several old gravel extraction areas that have since filled with water. Recreational improvements are limited to several picnic tables and some fire pits. Public access and use of the area is by permit only, and may be denied if use of the area is deemed to be in conflict with the greater designation of the land for military purposes. Additionally, camping is limited to military purposes only.

FHWA's 2005 Policy Paper once again provides useful guidance:

2. Public Parks, Public Recreation Areas and Wildlife and Waterfowl Refuges

Question C: Are publicly owned parks and recreation areas, which are significant but not open to the public as a whole, subject to the requirements of Section 4(f)?

Answer C: The requirements of Section 4(f) would apply if the entire public park or public recreation area permits visitation by the general public at any time during the normal operating hours of the facility. Section 4(f) would not apply when visitation is permitted to only a select group and not the entire public. Examples of select groups include residents of a public housing project; military and their dependents (see also Question 11 B); students of a school; and students, faculty, and alumni of a college or university. FHWA does, however, strongly encourage the preservation of such parks

4

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Ruiton
January 26, 2009
Page 6

and recreation areas; even though they may not be open to the general public.

FHWA Section 4(f) Policy Paper at 12. Because the Eielson AFB Recreational Area and the crossings of the Twentymile Slough Trails where they are located on Eielson AFB are not accessible to the general public, we submit that those areas do not qualify for Section 4(f) protection under FHWA guidance.

Selected Roads/Trails (ADNR Forestry Winter Road, U.S. Army Permit Route, Koole Lake Trail and Donnelly-Washburn Trails, and Silver Fox Lodge Trail)

We agree that some of the trails identified and discussed in Appendix M are Section 4(f) resources. However, we believe that more detailed analysis of the following trails is warranted, for the reasons described below:

- The U.S. Army Permit Route crosses the Little Delta River with the Koole Lake/Donnelly-Washburn Trail and collocates with all trails on the river's western bank for a stretch of approximately 1.5 miles, then diverges west across ADNR land toward the Tanana Flats Training Area (TA). It is not designated for public access, although public access is a generally-allowed use across ADNR-owned lands.
- The ADNR Forestry Winter Road, a multi-use road established by the Division of Forestry located entirely on ADNR land, is approximately 14.8 miles long, and connects the Delta River and Delta Creek across the benchlands above the Richardson Clearwater River. The road provides public access to a number of public and commercial timber sales in the Tanana Flats, and is also used for recreational vehicle activity.
- The Koole Lake Trail and Donnelly-Washburn trails are located west side of the Tanana River on both the east and west sides of the Little Delta River. The Koole Lake Trail is an ADF&G trail that collocates with the Donnelly-Washburn Trail from a trailhead at Richardson Highway near Birch Lake south along the western bank of the Little Delta River, crossing the Little Delta to a point within the Donnelly Training Area. At this point, the Koole Lake Trail diverges toward Koole Lake and the Donnelly-Washburn Trail continues to the southeast through the Donnelly TA. The Donnelly-Washburn Trail is an RS 2477 trail (number 0064). RS 2477 stands for Revised Statute 2477 from the Mining Act of 1866, which granted a public right-of-way across unreserved federal land to guarantee access as land transferred to state or private ownership. Located on both ADNR and U.S. Army land, the trails are multi-use, but primarily receive winter use. ADNR land in this area is managed primarily for forestry and wildlife habitat according to the Tanana Basin Area Plan (ADNR 1991), while military land is primarily for military use, but is provisionally open to recreation activities.

5

Mayer Brown LLP

Comment Number: 22 (continued)

Victoria Ruiton
January 26, 2009
Page 7

- The approximately 6.1-mile long Silver Fox Lodge Trail leads south from the Silver Lake Lodge historical site along Richardson Highway and crosses the Tanana River. It is located on ADNR land south of the river, where it provides access to state land along the Fivemile Clearwater River, although portions of the trail may intersect some land in private ownership. The trail is established and recognized by the ADNR (lease assignment, or ADL lease number 409488). This multi-use trail provides public access across the Tanana River to areas surrounding the Fivemile Clearwater River. The trail also provides public access to ADNR lands further west, which may otherwise be inaccessible due to the military lands to the north and south. ADNR land surrounding the trail is designated for forestry and wildlife habitat uses in the Tanana Basin Area Plan. One management subunit contains accessible white spruce stands, and forestry activity has been ongoing. Appendix M states "... no other trail or road provides access to the private forestry lands adjacent to the trail."

Appendix M's listing of these roads/trails as Section 4(f) resources cannot be reconciled with the information detailed above. A distinction ought to be recognized between trails used for public access and those used for recreational activities. The primary purpose of the ADNR Forestry Winter Road is access to public and commercial timber sales in the Tanana Flats, although we understand it is also used for recreational vehicle activity. The primary purpose of the Koole Lake Trail and Donnelly-Washburn trails is for access to ADNR land managed primarily for forestry and wildlife habitat and access to military land that is primarily for military use, although provisionally open to recreation activities. The primary purpose of the Silver Fox Lodge Trail is public access to ADNR lands designated for forestry and wildlife habitat uses, including lands where forestry activity has been ongoing. The primary purpose of the U.S. Army Permit Route is for military use, and it is not designated for public access except for a small portion collocated with other public trails. Because the primary use of these roads/trails is not recreational, we believe that they should not be considered Section 4(f) resources.

De minimis Impacts

Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) amended existing Section 4(f) statutory requirements to include an exception for uses of protected land that had a "de minimis" impact on that land. With respect to parks and recreation areas, SAFETEA-LU specifically authorized the Secretary of Transportation to find "that the transportation program or project will not adversely affect the activities, features, and attributes of the park, recreation area, or wildlife or waterfowl refuge eligible for protection under this section." 49 U.S.C. § 303(o)(3). Importantly, this finding of no adverse effect may include consideration of impact avoidance, minimization and mitigation or enhancement measures. See *id.* § 303(d)(1)(C).

FHWA has developed a set of questions and answers that reinforce the importance of applying SAFETEA-LU's "de minimis" impact rules. See FHWA, *Questions and Answers on the Application of the Section 4(f) De Minimis Impacts Criteria*. That document makes clear that FTA applies the Section 4(f) de minimis rules. See *id.*, Question 1A. FRA has also applied the

6

Mayer Brown LLP

Comment Number: 22 (continued)
Victoria Rutson
January 26, 2009
Page 8

Section 4(f) de minimis rules in prior environmental reviews. See, e.g., Draft Section 4(f)/303 Statement for the Dakota, Minnesota & Eastern Railroad Application for Railroad Rehabilitation and Improvement Financing (RRIF) Relating to the Powder River Basin Project (August 2006).

To date, it is our understanding that neither the Department of Transportation, FRA or FTA have weighed in on the Section 4(f) findings contained in DEIS Appendix M, including the possibility that any impacts to Section 4(f) properties are de minimis. As the Board proceeds with the Section 4(f) process, we believe it would be appropriate for the agencies to consider whether the impacts described in Appendix M are de minimis. If FRA and FTA conclude the project's impacts on a Section 4(f) property is indeed de minimis, the substantive requirements of Section 4(f) should not apply to that property.

As part of the project, ARRC plans to provide continuity of trails to ensure continued access to public lands. Please note the following statement regarding the proposed action from DEIS page 2-38:

To maintain access to existing public and private roads and trails across the rail line, ARRC would install grade crossings where the rail line would cross a roadway. . . . Where the rail line would cross legally authorized trails and FNSB trail easements, ARRC has indicated that the crossings would likely be grade separated. (DEIS page 2-38)

Also, the STB has included in the DEIS a mitigation measure (No. 62) requiring ARRC to provide a number of trail crossings, including crossings for the trail to the Blair Lakes Area; Silver Fox Lodge Trail; ADNR Winter Trail; Koole Lake Trail; Donnelly-Washburn Trail; ADNR Forestry Winter Road; and Rainbow Lake Trail. Notably, ARRC included two crossings of the ADNR Winter Trail as part of the proposed action. Implementation of ARRC's voluntary mitigation included as part of the project and STB measure 62 should make Section 4(f) impacts on these trails de minimis, assuming the agency with jurisdiction concurs.

Archeological Sites

Page M-21 page states "In the case of archaeological sites, Section 4(f) applies to those sites that are on or eligible for inclusion in the National Register of Historic Places and that warrant preservation in place. It does not apply to sites that are eligible only for their research potential." We understand that this applies to FTA funded projects. Although we believe it will also apply to FRA funded projects, we urge STB to confirm this with FRA.

Thank you for your assistance in a timely resolution of these concerns. Please contact me at the telephone number or email address printed above if you have questions or require additional information.

Mayer Brown LLP

Comment Number: 22 (continued)
Victoria Rutson
January 26, 2009
Page 9

Sincerely,


Kathryn Kusske Floyd

cc: David Navecky
Alan Summerville

Comment Number: 23



SURFACE TRANSPORTATION BOARD
 Section of Environmental Analysis
 Draft Environmental Impact Statement for the
 ALASKA RAILROAD CORPORATION'S
 PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name:	Steven C. Jeffries
Address:	6365 River Running Rd
City, State, Zip:	Salecha, AK 99714
Phone:	488-0711
Email:	sourdoughpark@alaska.net

What comments do you have about the Draft Environmental Impact Statement?

Thank you for using an island within the Tannana River, rather than taking my home. We'll there be provisions for the public to cross the river via your bridges with four wheelers, for recreation, hunting, fishing etc.?

Comment Number: 24



SURFACE TRANSPORTATION BOARD
 Section of Environmental Analysis
 Draft Environmental Impact Statement for the
 ALASKA RAILROAD CORPORATION'S
 PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name:	Margaret D. Schwanitz
Address:	Box 55133 8226 Strayville Ln
City, State, Zip:	Delta, AK 99705
Phone:	907-488-4127 AST 10A-9P
Email:	newhork@hotmail.com

What comments do you have about the Draft Environmental Impact Statement?

The Strayville area flooded in May & July 2008 (via per-bog water). The old Tannana bank has been bed old sloughs. This area hasn't flooded in 30-40 years. I am a representative weather observer for the Fairbanks Area office. We experienced 30" & 24-28" snow respectively. We in our neighborhood are concerned that the proposed levees for the bridge will further erode bank, leading in our area, possibly to the point of abandonment. We would be wondering who would be involved if property is abandoned and transportation fuel claim were sought. Thank you.

Comment Number: 24 (continued)

I have several neighbors who are elderly and/or have income who would need to know what options are available to them, as we all currently are homeowners in this area:

*Mike Stablaecker Margaret Schwartz + Mureah Friz
George + Amy Wilkstris name on Fairbanks address
Bob + Val Watters property database to link
Mary + Walter as up
John + Caroline Taylor
Unoccupied addresses: Estate Charles H. Green, Jr., Malory Rowe,
Michael Miller (W?)*

Place
Stamp
Here

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Comment Number: 25

Ken Severin

residence:
2235 Penrose Lane
Fairbanks, AK 99709

I own approximately 87 acres at the confluence of the Salcha and Tanana, on the south bank of the Salcha and as far west as you can drive. Specifically these are Tax Lots 2830 (46.67 acres) and 2827 (40 acres), SECTION 28 T15S R4E. I do not have any structures on this land nor do I intend to build on it, but I regularly use it for hunting, camping, and general recreation.

I am in favor of the Salcha 1 over Salcha 2. I have no opinions about other parts of the EIS.

On a very personal level, Salcha 2 would all but destroy the solitude and relative isolation that I value in my Salcha property.

On a more practical level, Salcha 2 would affect a great deal more private property than Salcha 1 and probably cause a lot more turmoil and strife.

Most important, Salcha 2 might impact salmon spawning areas in the Tanana at the crossing near Flag Hill. While it is easy to say that "Alaska has plenty of salmon and disturbing a bit of habitat probably won't matter," it is exactly that kind of thinking that led to the destruction of salmon populations in England and Europe, New England, and much of the Pacific North West. If this railroad must be built, and we have a chance to build it without disturbing salmon habitat we should take it.

Thank you.

Comment Number: 26



SURFACE TRANSPORTATION BOARD
 Section of Environmental Analysis
 Draft Environmental Impact Statement for the
 ALASKA RAILROAD CORPORATION'S
 PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: February 2, 2009.

Full Name:	Joshua R. Parsons
Address:	6514 old Richardson Hwy
City, State, Zip:	Sitka, AK 99704
Phone:	907-478-4194
Email:	snake_wizard@yahoo.com

What comments do you have about the Draft Environmental Impact Statement?

- I do not support this project because:
 1. I do not have tonight numbers reflecting how many workers will be using the train roadway thru Friday that live in Sitka, North Ale or Fairbanks.
- I have not been given a projected number on how many passengers will be going to Delta during the summer time. What is there for tourist to see.
- What is the number of Bushels or the tonnage of freight that will be moved between Delta and Fairbanks?

Comment Number: 26 (continued)

- What about the fluctuation between summer and winter as far as workers go. What happens if finding to fly freely is pulled?
- What is the true justification for this Railroad Extension? Without any numbers, there is no justification, just someone's good idea.
- Work starts for me at 11am and ends at 530pm in Delta. Will the train work with that schedule?
- Will I, as a citizen, be able to utilize the bridge that is 1/2 a mile away? Is the bridge going to be owned by the DOD?
- I do not want the Railroad to be 900' away from my house and not at the very least be able to utilize the bridge to go across the Tundra to access new hunting ground.
- I do not support this project because it has not been justified at all. I will not support this project at all because of that.

Place
Stamp
Here

David Navecky
 STB Finance Docket No. 34658
 Surface Transportation Board
 395 E Street S.W.
 Washington, D.C. 20423-0001

Comment Number: 27



SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Draft Environmental Impact Statement for the
ALASKA RAILROAD CORPORATION'S
PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov/>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name:	Matt Jacobson
Address:	PO Box 57033
City, State, Zip:	North Pole, Alaska 99705
Phone:	907-488-5755
Email:	jacobson2northstar.k12.ak.us

What comments do you have about the Draft Environmental Impact Statement?

Great job. Easy to read & understand.
It would have been helpful to bold applicants preferred choices on maps - Alternates chosen impact the least amount of private / developed land. NRE has the potential to reduce impact to environment - air, water, soil - by reducing vehicle traffic on area roads.

1

Comment Number: 27 (continued)

I agree with the applicants preferred alternative. All culverts should be large enough for passage of canoes, dogsleds, snow machines, fish passage etc. for year round access & travel.

2

Place
Stamp
Here

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Comment Number: 28

UFO (UNEXPLODED ORDNANCE) AND MMR
(MILITARY MUNITIONS RESERVE) HAZARD EXIST
ON ALL AREAS OF THE WNI BLAIR LAKES
BOMBING/STAFFING RANGE. THIS AREA ENCOMPASSES
ALL AREAS SOUTH OF THE TANANA RIVER FROM
LAO FIELD (NOW FORT WAINWRIGHT) AND THE
WEST BANK OF THE DELTA RIVER. CURRENTLY
THIS AREA COMPRISES DELTA TRAINING AREA (DTA)
AND TANANA FLATS TRAINING AREA (TFTA) AND THE
STATE OF ALASKA LANDS BETWEEN DTA AND TFTA.

HERBERT L. GRIFFIN JR.
ENVIRONMENTAL SCIENTIST FWA

Place
Stamp
Here

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Comment Number: 29



SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Draft Environmental Impact Statement for the
ALASKA RAILROAD CORPORATION'S
PROPOSED NORTHERN RAIL EXTENSION

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: **February 2, 2009.**

Full Name: <u>Darcy Echeverry</u>
Address: <u>P.O. Box 55550</u>
City, State, Zip: <u>North Pole, AK 99705</u>
Phone: _____
Email: _____

What comments do you have about the Draft Environmental Impact Statement?

I made a mistake on my oral comment -
Please correct that Gilsen Rt 3 is
my preferred route and 142 would be
detrimental to wildlife habitat

Rec'd 1/13/09
del

Comment Number: 30

January 13, 2009

Mr. David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Dear Mr. Navecky:

The Eielson farm community is pleased to have received and be able to comment on the draft Environmental Impact Statement, STB Finance Docket No. 34658, for the construction and operation of a rail line between North Pole and Delta Junction. Our concern is the routing that impacts the Eielson agricultural area and identified in the draft as the Eielson alternatives 1-3.

The Eielson farm community supports the Eielson Segment 3 Alternative. It is the alternative supported in our November 7, 2005 letter to the STB and again supported in our May 10, 2006 letter to the STB. We are pleased that this routing is identified in the draft as the Applicant's (Alaska Railroad) preferred routing. We continue to support this routing as it best meets the needs of both the railroad and the Eielson Farm community.

The Eielson farm community does not support the two alternative routings identified as Eielson Segment Alternative 1 and Eielson Segment Alternative 2. These two routings negatively impact the Eielson farm community. We are concerned that Table 8-2 (Summary and Comparison of Potential Impacts) does not fully measure the number of farm acres lost for farming under alternatives 1 and 2. Table 8-2 counts just two acres lost with these routings. Our assumption is that only currently cropped acreage that would lie directly under the track after construction is counted in Table 8-2.

Our review suggests that approximately 50 acres would be lost. This includes the farm acreage split from the remainder of a farm after track construction. Without constructed crossings, this acreage would be unavailable to the farm owner after the railroad has split a farm.

Again, the Eielson farm community supports the Eielson Segment 3 alternative. We do not support Eielson Segment alternatives 1 or 2.

Thank you for opportunity to comment.

Sincerely,
Donald V. Illingworth
Ron Illingworth, for
Eielson Farm Community

Comment Number: 30 (continued)

REF: Alaska Railroad—Northern Rail Extension—Eielson to Ft. Greely

Eielson Farm Community, Signatures

Christina Belts
Christina Belts
11245th 100th
Mailing Address
PO Box 56146
5745 Skila St
Sachin, Alaska 99714
NP, AK 99705

Ronald D. Illingworth
Ronald D. Illingworth
Mailing Address
PO Box 57402
North Pole, AK 99705

Tom Simpson
Tom Simpson
Mailing Address
PO Box 55234
Sachin, Alaska 99714

Mark W. Kern
Mark W. Kern
Mailing Address
PO Box 55714
Sachin, AK 99714

Robert L. Barnes
Robert L. Barnes
Mailing Address
PO Box 55714
Sachin, AK 99714

Tom Simpson
Tom Simpson
Mailing Address
PO Box 55714
Sachin, AK 99714

Tom Simpson
Tom Simpson
Mailing Address
PO Box 55714
Sachin, AK 99714

Comment Number: 30 (continued)

REF: Alaska Railroad—Northern Rail Extension—Eielson to Ft. Greely

Eielson Farm Community, Signatures

Patricia Padon
 407 Sigurd Ave. Ste 14920
 Fairbanks, AK 99701
 Mailing Address
 PO Box 81465
 Fairbanks, AK 99705

Reis + Mike Stavis
 P. Box 55542 North Pole, AK
 Mailing Address
 Mike Stavis
 4461 Eielson Farm Rd
 North Pole, AK 99705

Robert Riddell
 1945 Paulsen Ave.
 Mailing Address

Michael G. McGowan
 1400 Old Rich Hwy
 Fairbanks, AK 99705
 Mailing Address
 Valerie A. Foster
 6405 Lee Road
 Denny West ad
 Mailing Address
 PO Box 56197
 North Pole, AK 99705

Todd Lion
 5601 Eielson Farm Road
 North Pole, AK 99705
 Mailing Address
 5601 Eielson Farm Road
 North Pole, AK 99705

Comment Number: 30 (continued)

REF: Alaska Railroad—Northern Rail Extension—Eielson to Ft. Greely

Eielson Farm Community, Signatures

Warren F. Smith
 3943 Hurst Rd
 North Pole, AK 99705
 Mailing Address
 PO Box 7251
 Fairbanks, AK 99707

Frank Walczyk
 4461 Eielson Farm Rd
 North Pole, AK 99705
 Mailing Address
 PO Box 55474
 North Pole, AK 99705

Francis Marlon
 PO Box 55474
 North Pole, AK 99705
 Mailing Address
 PO Box 55474
 North Pole, AK 99705

Betty Jo Schmitz
 3390 Duncan Road
 North Pole, AK 99705
 Mailing Address
 PO Box 57248
 North Pole, AK 99705

John W. Johnson
 3390 Duncan Road
 North Pole, AK 99705
 Mailing Address
 PO Box 57248
 North Pole, AK 99705

Jason B. Peters
 4385 Eielson Farm Rd
 North Pole, AK 99705
 Mailing Address
 PO Box 57248
 North Pole, AK 99705

Comment Number: 30 (continued)

REF: Alaska Railroad—Northern Rail Extension—Eielson to Ft. Greely

Eielson Farm Community Signatures

Wendy Callis
Wendy Callis
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Robert J. Williams
Robert J. Williams
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Fred HATHA
Fred HATHA
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Nathan Callis
Nathan Callis
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Brian Tanaka
Brian Tanaka
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Loisaine Sims
Loisaine Sims
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Comment Number: 30 (continued)

REF: Alaska Railroad—Northern Rail Extension—Eielson to Ft. Greely

Eielson Farm Community Signatures

Robert J. Williams
Robert J. Williams
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Robert J. Williams
Robert J. Williams
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Oliver G. Gou
Oliver G. Gou
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Dwaine D. D. D.
Dwaine D. D. D.
P.O. Box 55735, North Pole, AK 99705
Mailing Address

Mailing Address

Mailing Address

Comment Number: 31

January 13, 2009

Dear Members of the Surface Transportation Board,

I fully support the Northern Rail Extension to Delta Junction. I live at 4800 Eielson Farm Road and Eielson 1 & 2 will directly impact my home. Because I support the railroad I am trying hard to calm my personal feelings of devastation at the thought of a railroad running directly behind my retirement home. If there is a good reason why Eielson 1 or 2 needs to be chosen, I will need to understand that reason. I fully support Eielson 3, the preferred ARRC route.

In reviewing the summary of potential impacts, and my personal knowledge and experience, I understand the following to be true as reasons for you to choose Segment 3:

- Topography
 - Because all routes are the same the preferred route (3) is acceptable
- Water resources
 - Culverts and bridges
 - It's hard for me to argue this one. I'm just hoping that in considering all impacts the difference between the three segments will be insignificant.
 - Wetlands
 - Although route 3 affects more wetlands I question the quality of the wetlands on that route. Because the area around 3 is close to the highway and used as a recreation area for military personnel it would seem those wetlands are already impacted. If the railroad route runs on the other side of Piledriver (segment 1 or 2) you would be opening up access and damage to relatively isolated land.
 - I am wondering how much of the wetlands were created when the highway was built which impeded the natural water flow. Impact has already occurred to the area surrounding the highway and the isolated land on the other side of Piledriver should remain as natural a system as possible.
- Biological resources
 - Fish bearing stream crossing
 - Although there are more stream crossings on Segment 3 there are less crossings that affect spawning or anadromous fish habitat.
 - Animal Habitat loss
 - About the same for each segment but I think you should take into consideration the nature of the land on Segment 1 or 2. The farm land attracts moose to graze in the hayfields and the moose travel between the farms and piledriver slough. If they have to cross a railroad track to get to the slough I think many more will be killed than if the railroad was on the other side, segment 3. The fields also attract mice and other rodents which in turn attracts fox, coyotes and numerous birds of prey. A railroad running through the farming community would negatively impact those animals.
 - No eagle or hawk nest found on Segment 3.

1

Comment Number: 31 (continued)

- Cultural resources
 - All routes have about the same impact therefore the preferred route should be acceptable
- Noise & Vibration
 - Although only Segment 3 has adversely affected noise receptors I would argue that is not a major concern. The recreation area on that route is already impacted by the proximity of the highway and the Eielson Airforce runway. Military jets taking off and landing (the sound of freedom) is noisy.
- Land Use
 - Your figures show segment 3 affects about the same area of private land as segment 1. I question how you came up with the amount of private and agricultural land affected. Because the railroad crosses our property in two places I would say it would directly affect at least 5 acres of agricultural land. In my mind if the railroad crosses designated agriculture land it has affected agricultural use whether or not the land is cleared. I think closer review would reveal the number of agricultural land affected to be much higher. Segment 3 does not cross any designated agricultural land.
 - Segment 3 does not affect any residences
 - Segment 3 has the least impact on recreation route access.
 - "Choosing segment 3 will minimize the effects on 4" resources". I would assume this would mean the extensive dogmushing trails in this area. Other activities impacted by segment 1 or 2 would be the horse trails which are utilized by the local horse boarding facility and trapping lines which our family has established.
 - Visual
 - All routes have the same impact therefore the preferred route should be acceptable

In conclusion I have not read or heard any valid argument for the need to disrupt my life by running a railroad next to my house. Please keep the impact of the railroad in the existing transportation corridor by choosing Eielson Segment 3.

Thank you for your consideration,

Robyn Davies
4800 Eielson Farm Rd
PO Box 55266
North Pole, AK 99705
davrobyn@hotmail.com

January 12, Pikes 5-8

Comment Number: 31 (continued)
 Testimony of Robyn Davies
 1/13/09
 Northern Rail Extension Draft Environmental Impact Statement

Comparison of routes Eielson 1,2 &3

	Segment 1	Segment 2	Preferred route Segment 3
Topography	Minimal grading filling 25% permafrost, 5 feet overburden	Same	Same
Water resources	13 culverts & 1 small bridge 16.8 acres wetlands (forested 6.9, scrub/shrub 7.1, emergent 1.5, other waters 1.3)	10 culverts and 3 small bridges 70.8 23.3 43.1 3.5 .9	14 culverts & 3 small bridges 100.3 36.7 48.6 5.7 9.3
Biological resources	Vegetation cleared 246.4 Fish bearing stream crossings 2, (2 spawning, 2 anadromous habitat Direct habitat loss Bear 246.4 Caribou 123.8 Moose 246.4 Wolves 247.3 Furbearers 237.2 1 bald eagle and 2 redtailed hawk nest affected	241 3 crossings (2spawning, 2 anadromous 241 146.4 241 241.2 222.9 same	238.5 7 crossing (1 spawning, 1 anadromous) 238.5 124.5 238.5 239.3 222 No nests
Cultural resources	Negligible potential for impacts to historic and prehistoric resources Sites - 0	Same	Same
Noise and vibration	No adversely affected noise/vibration receptors	Same	4 adversely affected noise receptors
Land Use	52 acres private land - 2 acres in agricultural use 2-3 residences directly affected 11 recreation access route intersections 4(f) resource present Consistent with VRM Objectives	78 acres private land, 2 acres in agricultural use 8 recreation 4(f) resource present	55 acres private land 6 recreation access route 4 (f) resource present same
Visual	Same	Same	same

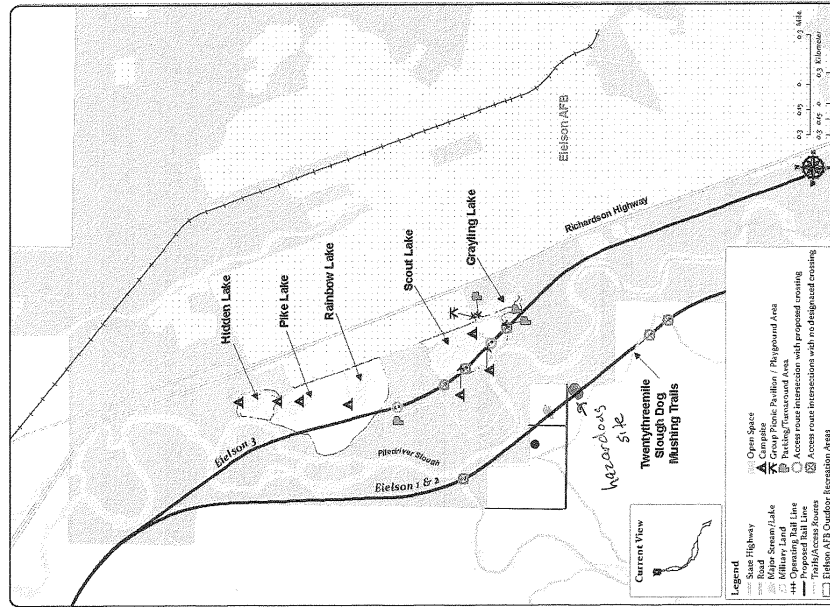


Figure 13-3 - Map of Recreational Facilities along the Eielson Alternative Segments

Land Use

13-29

Comment Number: 32

DRAFT list of the Vincent's comments so far—we'll find more, but this is a start. Feel free to use them all or in part when preparing your own comments and let us know what we have missed that we can add to these. The more info we can provide, the better.

We are concerned about how the Northern Rail Extension project may affect our property; the 40 property owners on Fivemile Clear Creek (referred to in the report as Fivemile Clearwater River); the creek itself; hunting, fishing, and recreation for all property owners and users in the area; and access to properties and hunting grounds in the area of the creek. The comments we are providing are in regards to the Tanana River crossing near Salcha, the Central Alternatives 1 and 2, and the associated connectors. Specifically, our comments are:

1. Figure 2-17, Tanana bridge Alternative 2, shows a channel blocked with "fill" on the west side of the Tanana to accommodate the bridge. This is the channel that is used to access the mouth of Clear Creek. Creek flow would not likely be enough to maintain navigability as it spreads over the wide channel bed, so blocking Tanana flow to this channel would cut off summer access to the creek and the 40 properties on it. There is no other reasonable summer access to the creek. Additionally, in reference to this same figure, are concerns about what impact this will have to the fish population on the creek. The grayling migrate annually, and there are annual salmon runs. This alternative could be detrimental to both, thereby leading to serious environmental concerns further up the food chain.
2. a. Figure 13-33 shows one allowable crossing of railroad line near the headwaters of the creek and one near the mouth of the creek. According to this Draft EIS, crossing the railroad line will not be allowed in other locations. This cuts off winter access to most properties on the creek. The creek doesn't freeze in the winter, so the creek cannot be used as a trail from the crossings upstream or downstream to the properties. Landowners have built their own winter trails where they are needed to access their properties. Drawing a line across these cuts off their winter access to their properties.
3. b. Central Alternative 1 and 2 (and associated connectors) draw lines across prime hunting areas and access to other areas that cannot be crossed for hunting. There are existing trails that cross the proposed line locations. Many of us built our cabins out there for hunting, but rail lines will greatly reduce that area that can be hunted.
4. c. ADNR regulations allow for the construction of the above-mentioned trails (Draft EIS p.13-25) and has stated they "... would require accommodation of these legal features." yet the railroad has not addressed how they intend to resolve this conflict. In fact, the Draft EIS states that "In roadless area, off-road vehicles would be prohibited from crossing the rail line at non-designated points" (Draft EIS p.13-25). Resolution to this conflict should be proposed in this Draft EIS so that the public has the chance to comment on it.

Comment Number: 32 (continued)

5. 3. Note that the creek is used by jetboats and airboats. Bridges must be built with adequate clearance for the taller airboats.
6. 4. I cannot find info in the Draft EIS on where a construction camp or construction storage area might be located in the Clear Creek area. This could have significant environmental impacts and a proposed location should be identified and addressed in this document.
7. 5. Note that construction closures of the creek and popular hunting grounds should be planned to not coincide with hunting season. People with property on the creek should be notified of such closures in advance, not when they get parway up the creek with a boatload of supplies and plans to spend a weekend at their cabins.
8. 6. No noise and vibration analysis is included for this area as "... no receptors were identified near the proposed rail line." (page 9-6 of the Draft EIS). There are 40 privately owned properties on the creek, about 1/2 of which have cabins that are used regularly. There is also wildlife in the area that would be affected by the noise and vibration of 10 train trips through there per day. A noise and vibration analysis should be done for this area.
9. 7. Between Clear Creek and the Tanana, behind the private properties, is a clear-running stream that sustains a salmon population and likely other fish. I cannot tell from maps provided if Alternative 2 affects this stream, but it should be considered. This is the area off military land.



**AUTOMOTIVE ACCESSORIES
SIGNS • BANNERS • MOBILE ELECTRONICS
REMOTE AUTO STARTS • CUSTOM GRAPHICS**
Steve Vincent
2550 South Cushman St.
Fairbanks, Alaska 99701
Email: steve@autotandesigns.com
Ph: (907) 456-8400
Fax: (907) 456-8408
Website: www.autotandesigns.com

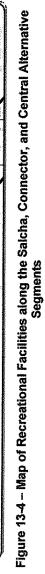


Figure 13-4 – Map of Recreational Facilities along the Salcha, Connector, and Central Alternative Segments

13-33

2-32

Comment Number: 32 (continued) Transition Draft Environmental Impact Statement

ADNR regulations allow for the construction of trails up to 5 feet wide (unserialized trails) on state land. Individuals are not required to report the use or location of these trails to the ADNR. Trails of this type are quite common on state lands along many of the proposed alternative segments. The Alaska Division of Mining, Land & Water, has indicated that it would consider closure of these generally allowed trails to be an impact, would require further investigation to determine their location and use, and would require accommodation of these legal features (Proulx, 2008).

Access to areas west and south of the Tanana River (the majority of the proposed project route) is generally available via tributary river systems in both summer and winter. These river systems provide access for boats, and winter access for snowmachines, dog-sleds, skiers, and snowshoos. Access up these river systems depends on clear passage, and the numerous bridges and culverts that would be required for the proposed rail line could result in an obstruction, depending on the amount of clearance available for passing under a bridge or through a culvert. Use of culverts on smaller waterways would likely block all access; however, it is generally assumed that most main river access routes to areas west of the Tanana River would be via larger rivers and streams (Fivemile Clearwater Creek, Little Delta River, Delta Creek), where bridges with ample clearance would be used. Major bridges at the Salcha River, Tanana River, and Delta River would also have adequate clearance for boats and other vehicles. In addition, ARRC has supplied conceptual design information pertaining to bridges on smaller streams (see impact analysis for individual segment alternatives), and not all small bridges would be passable by boats or other vehicles. ADNR's Tanana Basin Area Plan includes a management guideline to provide adequate clearance for passage of boats, pedestrians, horses, and large game whenever these uses occur or are anticipated to occur at significant levels. Water Quality Management Guideline E states that alternative public access must be provided if a structure would block access (ADNR, 1983, updated 1991).

Off-road vehicles provide an important mode of accessing areas west of the Tanana River. Routes for these vehicles may follow established trails and roadways. Riding snowmachines, jeeps, and small off-road vehicles on ADNR land is a generally allowed activity, though permits can be required in areas with special designations. ADNR and ARRC are encouraged to develop a negotiated agreement that would define rail line crossings for off-road vehicle access on existing roads and trails.

ARRC to provide for a systematic mitigation approach for existing public roads and trails. In roadless areas, off-road vehicles would be prohibited from crossing the rail line at non-designated points. Several stretches of alternative segments have long distances between crossable locations (at roads/trails or along waterways with adequate bridge clearance to allow an off-road vehicle to pass underneath). This would likely result in decreased off-road vehicle access to public lands west of the rail line.

ARRC has not designated vehicular or non-vehicular crossing points for most established trails and roadways known to ADNR, nor has a method been developed to date for identifying and mitigating the numerous unserialized trails developed by members of the public and allowed under Alaska state law. All trails and roads that have no existing mitigation proposed by ARRC could result in closure of the resource and commensurate decrease in public access. This would contradict the public access management guidelines as outlined in the Tanana Basin Area Plan, in which retention of existing public access constitutes the first goal (ADNR, 1983, updated 1991).

Land Use

13-25

Comment Number: 33

RAILROAD SAFETY AND DEVELOPMENT GROUP P.O. Box 71114 Fairbanks, AK. 99707

January 12, 2009

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

ATTN: Victoria Rutson Chief
Section of Environmental Analysis

Dear Ms Rutson:

The Railroad Safety and Development Group strongly support extending the Alaska Railroad to Delta, and beyond. It is a first step of extending it to the lower 48 States which we believe is necessary to achieve Alaska's logical role as a world transportation hub.

Our review of the project's environmental document did not reveal any substantial environmental issues. However we did note that the report contained some information regarding impacts to communities outside the limits of the study but within the Fairbanks North Star Borough - namely Fairbanks and North Pole. We agree that these communities be included in your analysis. And we offer comments pertaining to them.

First of all, it was our understanding that the project limits would include the community of North Pole thus allowing timely relocation of the track between Moose Creek to approximately 9 mile on the Richardson Highway. It appears not to be the case. This is somewhat disappointing since the track is now causing concern for the safety of our children, especially near the schools adjacent to the track. Could this be addressed in the Final EIS?

Second, information regarding the existing alignment through Fort Vainwright and Fairbanks suggests the anticipated added railroad traffic will exacerbate existing air quality, noise, traffic problems, and of utmost importance, more safety concerns. The documented impacts make it clear that continuing routing rail traffic through these communities is highly undesirable.

We noted from the report, that while the number of trains will increase, the average lengths will decrease. This may be misleading to reviewers, as well as introduce analytical errors if only average lengths are considered. Passenger service will be limited to very short trains - perhaps as short as one motorized car. Would it be more accurate to say that freight trains, especially fuel trains will remain at current lengths and be more frequent? It is these long trains that cause serious air quality, noise, and traffic impacts.

1

2



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126

January 29, 2009

9043.1
ER08/1286
PEP/ANC

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Dear Sir:

The U.S. Department of the Interior has reviewed the December 2008 Draft Environmental Impact Statement (EIS) for the proposed construction and operation of the Northern Rail Extension by the Alaska Railroad Corporation (ARRC). The Draft EIS analyzes potential environmental impacts if ARRC were to construct and operate the proposed action, an approximately 80-mile long rail line from North Pole, Alaska, to Delta Junction, Alaska. We request that the following comments be taken into account in the Final EIS. These comments are submitted in accordance with the National Environmental Policy Act, Fish and Wildlife Coordination Act, and the Council on Environmental Quality guidance for providing technical expertise on water, biological, and geological resources.

GENERAL COMMENTS

Route Alignment to Mitigate Impacts to Fisheries

Much of the preferred placement of the new rail line appears to be within the immediate Tanana River floodplain in order to take advantage of dryer, ice-free soils. While this approach has the benefit of more stable railroad beds, it may result in adverse impacts to fisheries. We believe further investigation is necessary to identify and address the potential impacts of the railroad beds on groundwater transport. This is important since a number of fisheries in this area, including anadromous and resident species, depend on upwellings of groundwater for spawning and overwintering habitat. It is important that flow of subsurface water to streams all along the proposed route not be disrupted. This additional investigation needs to include general groundwater flow and an examination of spring-fed streams. For example, it may be important to locate the railroad beds further away from spring-fed streams, such as Five-mile Clear Creek, and streams with known or suspected spawning and overwintering habitat, than is currently proposed. We recommend that additional studies of hydrology and instream habitat to address these questions be completed and the results included in the final EIS. We further recommend

1

Comment Number: 33 (continued)

3 The report mentions the most recent EPA particulate limits which these communities are now subjected to, but did not analytically address them.

4 The report also noted that crossings on Fort Wainwright, Richardson Highway, and the Old and New Steese Highways would be impacted. We urge you to include College Road and to a lesser degree, University Avenue.

5 Fully and accurately including this information in the EIS is justified because the Fairbanks North Star Borough air quality issues are so serious that they put local use of Federal Highway Funds in jeopardy.

Including them in this EIS will document the urgency to address track realignment through Fairbanks and North Pole.

Thank you for this opportunity to express project support and call your attention to our concerns.

Sincerely

Bob Thomas, P.E.
Railroad Safety and Development Group
(907) 378 9894 >bob38@acsalaska.net<

<u>Comment Number: 34 (continued)</u> SPECIFIC COMMENTS Chapter 20, Section 20.2.2, pages 20.4 to 20.5. The applicant's preferred alternative would cross 27 fish-bearing streams. A number of these streams are critically important to anadromous fish populations in the Tanana and Yukon River Basins. While this issue is addressed in the Affected Environment and Environmental Consequences sections of the document, we believe there is need for additional standards for the placement of culverts and bridges in the Mitigation chapter. For example, the applicant's voluntary mitigation includes a standard (VM-9) for culverts to meet or exceed 125 percent of stream width at Ordinary High Water. However, according to the Mitigation chapter, this standard is not applicable if the stream is equal to or greater than 15 feet in width. The Mitigation chapter in the Final EIS needs to provide specific standards for crossing streams of all sizes, including those greater than 15 feet in width. Prior to revising information on those standards in the Final EIS, we recommend that the applicant sponsor a fish passage mitigation workshop for all involved agencies to review existing standards as they relate to the proposed rail line and to develop a consensus on a single, comprehensive approach. Furthermore, it should be noted that the USFWS is drafting guidelines for culvert placement in fish-bearing streams and is available for further collaboration on fish passage.	<u>Comment Number: 34 (continued)</u> that additional proposed routes be identified and analyzed in the final EIS, if necessary, based on the results of these additional investigations. Fish and Wildlife Mitigation Agreement Due to the unavoidable loss of both aquatic and upland habitat associated with the proposed action, we recommend that a mutually-acceptable agreement between the applicant, the U.S. Fish and Wildlife Service (USFWS), and the Army Corps of Engineers, be developed that specifically identifies how the loss of these habitats will be compensated, and that the agreement be included in the Mitigation chapter of the Final EIS. Having such an agreement in place would ensure compliance with the Clean Water Act, Executive Order 11990 (Protection of Wetlands), the Migratory Bird Treaty Act, and Executive Order 13186 (The Responsibilities of Federal Agencies to Protect Migratory Birds). In addition, we believe the agreement would streamline the compensation process for wetlands and migratory bird and habitat resources for both the applicant and all involved agencies. Migratory Birds We believe the potential for impacts to birds may be more significant than is currently described in the Summary and Environmental Consequences. We recommend that the information on potential impacts be reassessed and revised in the Final EIS, focusing on and incorporating the following information: - The Tanana River Valley is one of Alaska's major corridors for migratory bird migration. Hundreds of thousands of waterbirds, passerines, and raptors move along this corridor seasonally. Significant changes within this corridor have the potential of affecting large numbers of birds. As climate change alters wildlife habitat in North America, this corridor may become even more important for species whose ranges are shifted northward. - The linear nature of the project bisects large areas of undeveloped habitat, thus fragmenting that habitat and creating a great deal more "edge" than would occur with a comparably sized project that is "concentrated." While this would impact species using both aquatic and upland habitats, it is of particular concern for forest dwelling species that need large unaltered blocks of habitat. Some of these species, such as the gray-checked thrush and Townsend's warbler, are already in decline and are listed by the USFWS as Birds of Conservation Concern. - In much of the area, the proposed rail line follows, and stays in close proximity to, the Tanana River, an area that supports sizable stands of mature floodplain forests. These well-drained stands of large timber are not abundant on the landscape. As a result, the stands are critically important for a number of raptors such as northern goshawks and bald eagles, cavity nesters such as three-toed woodpeckers, and forest nesting passerines.
Chapter 17, Section 17.4.1, pages 17.3 and 4. On page 17-3, the Draft EIS notes the interest in securing year-round access to the Tanana Flats and the potential for expansion of training and the system of roads and facilities. We believe the Final EIS needs to include additional evaluation of the potential cumulative effects from the possible expansion of military training facilities in the Tanana Flats Training Area once the proposed bridge is constructed across the Tanana River. On page 17-4, the Draft EIS describes the TransCanada Alaska and Denali gas pipeline projects in the context of the railroad expansion. We also believe that the Final EIS needs to include updated information on the status of these two pipeline proposals, in addition to a description of the proposal by the Alaska Natural Gas Development Authority for a pipeline, which would generally parallel the railroad extension. If you have questions concerning our comments, or if we may be of further assistance, please contact Jim Ducker at 907-271-3130 (jducker@blm.gov) regarding gas pipeline analysis and Larry Bright at 907-456-0324 (Larry_Bright@fws.gov) for all other questions. Sincerely, <i>Pamela Bergmann</i> Pamela Bergmann Regional Environmental Officer – Alaska	2 3
4 5	Page 2 of 3

Comment Number: 35 1/28/2009 Brad Dietrich 3208 International Fairbanks, AK 99701 907-452-2212 monap@alaska.net dtrich@ptalaska.net Alaska Railroad Corporation's Proposed Northern Railway Extension: Draft Environmental Impact Statement Comments re: STB Finance Docket No. 34658 To David Navecky: I am concerned about the impact the proposed northern rail extension will have on my recreational property located on Fivemile Clear Creek (referred to in the report as Fivemile Clearwater River). I own 5.87 acres on Fivemile Clear Creek with a small cabin, the exact location is T1-1106 SECTION 11 T7S-R4E PLAT 89-112 11/27/89 ASLS 89-199 TRACT F OUT OF TL-700 SEC 2-36 T7S-R4E. I access this property weekly via jet boat between mid May and mid October, traveling from the Salcha River Landing, down the Salcha, up the Tanana to the Tanana slough, continuing up the slough to the mouth of Fivemile Clear Creek, and up the creek to my cabin. During the winter months I access my property once or twice a month via snowmachine. My winter route involves parking along the Richardson Highway, traveling via snow machine across the Tanana River, and taking a trail along the west side of Fivemile Clear Creek. There are several issues that concern me about the proposed railway extension. The first issue is that Salcha Alternative Segment 2 Tanana River Crossing (Figure 2-17) shows a channel blocked with fill on the west side of the Tanana to accommodate the bridge. This channel/ slough is the one that is used to access the mouth of Fivemile Clear Creek. Currently the summer water level in this channel is low at best. I am concerned that blocking the flow from the Tanana River to this channel would lower the flow even more and potentially cut off summer access to my property, as well as the approximately 40 other private properties on the creek. Unfortunately, there is no other reasonable summer access to Fivemile Clear Creek. Losing this access would be disappointing recreationally for us all, as well as a big loss financially. Our property value would plummet because of its inaccessibility. Also, many of us property owners would lose a dependable hunting ground, which is counted on for yearly sustenance. Another major concern about the Proposed Northern Railway Extension is that the Draft EIS states that "In roadless area, off-road vehicles would be prohibited from crossing the rail line at non-designated points." If this were to happen it would effectively eliminate	Comment Number: 35 (continued) winter snow machine access to landowners on Fivemile Clear Creek. Fivemile Clear Creek does not freeze in the winter, therefore the creek cannot be used as trail access from the proposed crossings. Landowners have built their own winter trails to access their property, which would become illegal to use if you do not reconsider your allowable crossings. Also, it would also have another dramatic impact on the many property owners who hunt along the creek and the Tanana River on existing trails that cross many points of the proposed routes. While it appears that consideration has been given to proposed Fivemile Clear Creek bridges facilitating the movement of small jet boats, it should be noted that several land owners access the creek in airboats. Any bridges built must have adequate clearance for the much taller airboats. It appears that no noise and vibration analysis has been done for this particular area. With approximately 40 privately owned properties on Fivemile Clear Creek and about 20 cabins that are used regularly, 10 proposed train trips through the area per day would have a notable impact on many people. A noise and vibrational analysis should be done for this area. A final concern about the proposed railway extension is that there will potentially be construction closures of the creek. It would be imperative that property owners were notified of any such closures in advance. I am disappointed at all of the proposed routes for this railway. Why not run a route further south, through military land, since it's final destination is Fort Greely and main contributor thus far is the Department of Defense? Currently, there is no good proposed route for those of us that own property on Fivemile Clear Creek. I ask that you reconsider your routes and to take them further away from the private properties you would be dramatically impacting. If a route reconsideration is not an option, please consider seriously the previously mentioned points. It would be wrongful to cut off access to so many private properties. Finally, for those of us with property there, Fivemile Clear Creek is our haven - a quiet place to relax, enjoy wildlife, hunt for game, and get away from the craziness of daily life. Assuming access can be worked out, I am concerned that having a railway so close will detract from that experience. Would you want 10 trains per day traveling past your favorite recreational spot? Please do the right thing and reconsider you existing proposed routes! Sincerely, Brad Dietrich
Comment Number: 35 1	3 4 5

STB Incoming Correspondence Record

Page 1 of 1

Comment Number: 37

Surface Transportation Board
Incoming Correspondence Record

#EI-16345

Correspondence Information

Docket #: FD 34658 0
Name of Sender: James Parker
Group:

Date Received: 01/30/2009
Date of Letter: 01/30/2009

Submitter's Comments

I would like to submit public comment on the extension of the Railroad from Eielson AFB to Delta Junction.

First crossing the river to the South side is in the best interest of all stakeholders especially the US Army. It opens viable opportunity for the Army to expand training opportunities for the future.

Secondly, my main concern is that once the rail is on the South side of the Tanana, is to place it away from waterways especially the spring-fed systems and associated wetlands.

There is a stretch of slightly higher land that avoids most of the resource rich wetlands. These springs contain extensive fish habitat and should be left undisturbed. For the most part Subchta 1, Central Alternate 1, South Common Segment, and Delta 1 seem to take the higher ground (Bench land).

There is one exception and that is within the South Common Segment. Part of this section goes into the upwelling springs of Upper Clearwater River. No need to put a rail into these wetlands when it straighter, more southerly route could be taken. The wetland segment should be disturbed for all the water here is potential Cobscook juvenile rearing habitat and over winter habitat for many animals.

It appears this wetland area can be easily avoided, would make the rail straighter, save some mileage, and keep the rail on the Bench.

Thirdly, I definitely concur with the Delta 1 alternative. There are many reasons not to have the rail through Delta Junction. It would eliminate many conflicts with land and people. I could not think of a better crossing than what is proposed. This crossing is lined up well for future continuance of the line into Canada. It would also appear to have fewer conflicts being on the South Side of the Alaska Highway.

In brief, avoiding any rail within wetlands of the Richardson Clearwater River would prevent future environmental issues. I appreciate your considerations of these comments, thank you.
In reference to STB Finance Docket No. 34658

1

2

3

STB Incoming Correspondence Record

Page 1 of 1

Comment Number: 36

Surface Transportation Board
Incoming Correspondence Record

#EI-16344

Correspondence Information

Docket #: FD 34658 0
Name of Sender: Larry Dalrymple
Group:

Date Received: 01/29/2009
Date of Letter: 01/29/2009

Submitter's Comments

This is in reference to STB Finance docket No. 34658 regarding the proposed construction of a rail line between North Pole, Alaska, and Delta Junction, Alaska. For starters, it was absolutely a ludicrous statement to put in this document that it would be a criminal act to cross the rail ROW at a non-designated vehicle or pedestrian crossing point. The ROW between these two points will be crossed by ATVs and snowmachines, at non-designated points, thousands of times a month, especially in the winter. If we were to restrict access to the ROW to designated crossings, it would be a major inconvenience to the residents of the Fairbanks area. One existing trail that gets used extensively in the Fall and especially in the winter, is the Blair Lakes trail, near Flag Hill. There must be a crossing installed at that location.

Another concern that I have is the use of the bridge on the North Pole/Sachsa end of the line. I understand that it will have both railroad tracks and a road. Motorists and others will find a way to use that road for crossing, especially if there is no crossing on the other side of the bridge. This is a problem because the bridge is a half mile long. If there is no crossing on the rail bridges I fear there will be many fatalities at that crossing.

In addition to the above issues, regardless of the mitigation issues being proposed, I estimate that there will be 300-500 moose killed per year on that section of track. I believe the moose kill in this section will far exceed the worse kill ever recorded on the Denali corridor. This is a huge loss to the Fairbanks area. The Fairbanks area has a large moose population and what hunters take from that Game Management Unit is sold to support the local economy.

That piece of track runs perpendicular to a major moose migration route, its entire length. Twice a year, in the Spring and again in the Fall, there are thousands of moose crossings as the moose migrate to the hills in the north in the winter, and to the Tanana Flats, to calve, in the summer. I have observed moose behavior on railroad tracks and all of my experiences have been with moose on roads and trails. I have seen moose on the Denali corridor and on the Fairbanks Fish and Game Advisory Committee, the Alaska Department of Fish and Game, and the Alaska Department of Natural Resources.

1

2

STB Incoming Correspondence Record

Page 1 of 1

Comment Number: 37

Surface Transportation Board
Incoming Correspondence Record

#EI-16345

Correspondence Information

Docket #: FD 34658 0
Name of Sender: James Parker
Group:

Date Received: 01/30/2009
Date of Letter: 01/30/2009

Submitter's Comments

I would like to submit public comment on the extension of the Railroad from Eielson AFB to Delta Junction.

First crossing the river to the South side is in the best interest of all stakeholders especially the US Army. It opens viable opportunity for the Army to expand training opportunities for the future.

Secondly, my main concern is that once the rail is on the South side of the Tanana, is to place it away from waterways especially the spring-fed systems and associated wetlands.

There is a stretch of slightly higher land that avoids most of the resource rich wetlands. These springs contain extensive fish habitat and should be left undisturbed. For the most part Subchta 1, Central Alternate 1, South Common Segment, and Delta 1 seem to take the higher ground (Bench land).

There is one exception and that is within the South Common Segment. Part of this section goes into the upwelling springs of Upper Clearwater River. No need to put a rail into these wetlands when it straighter, more southerly route could be taken. The wetland segment should be disturbed for all the water here is potential Cobscook juvenile rearing habitat and over winter habitat for many animals.

It appears this wetland area can be easily avoided, would make the rail straighter, save some mileage, and keep the rail on the Bench.

Thirdly, I definitely concur with the Delta 1 alternative. There are many reasons not to have the rail through Delta Junction. It would eliminate many conflicts with land and people. I could not think of a better crossing than what is proposed. This crossing is lined up well for future continuance of the line into Canada. It would also appear to have fewer conflicts being on the South Side of the Alaska Highway.

In brief, avoiding any rail within wetlands of the Richardson Clearwater River would prevent future environmental issues. I appreciate your considerations of these comments, thank you.
In reference to STB Finance Docket No. 34658

1

2

3

http://www.stb.dot.gov/ecet1/eccorrespondence.nsf/PublicIncomingByDocketNumber/BD46... 2/2/2009

http://www.stb.dot.gov/ecet1/eccorrespondence.nsf/PublicIncomingByDocketNumber/2D21C... 2/2/2009

Comment Number: 38 To: 2/2/09 Case Control Unit STB Finance Docket No. 34658 1925 K St NW Washington, DC 20423-0001 Attn: David Novecky Environmental Filing From: Delta Fish & Game Advisory Committee PO Box 005 Delta Jct., AK 99737 Vern Aiton Jacob White Dean Cummings Regarding: E filing Comments regarding Alaska Railroad Northern Rail Extension EIS These comments are in regards primarily to that portion of the proposed Northern Rail Extension that is South and west of the Tanana River. CROSSINGS: There is a long history of miners, trappers, hunters, fishers, explorers and hikers crossing the proposed right-of-way on foot and by dogsled, ATV, snowmobiles and heavy equipment. Because these people will continue to access that area, it's imperative that there be numerous RR crossings to protect these travelers and to maintain the RR bed to prevent erosion. As a minimum, there should be crossings at: 1 Trail across from Delta BLM Airstrip 64°05' 02" approximate. 2. Section Line E/W 64°05' 02" approximate 3. Section Line N/S 64°07' 37" approximate 4. Rainbow Lake/ Forestry Road 64° 08' 33"N 145° 57' 40" approximate 5 West End Winter Forestry Road 6. Dry Channel of Delta Creek [access to full flood plain] 7. Delta Creek [access to full flood plain] 8. Cootie Lake Trail	Comment Number: 38 (continued) 9. Donnelly Washburn Trail 10. Little Delta River [access to full flood plain] 11. DNR Winter Trail All bridges should allow adequate under-passage for watercraft and land vehicles. WILDLIFE Newly pioneered rights-of-way expose unwary wildlife to abuse by construction and RR crews. Possession of firearms by construction crews should be strictly prohibited with severe penalties for contractors violating the prohibition. No portion of the proposed right-of-way should be vegetated with any plant life that attracts wildlife and exposes the wildlife to construction and train traffic. CC: AKDNR AC file
--	--

STB Incoming Correspondence Record Page 1 of 1 Comment Number: 39 Surface Transportation Board Incoming Correspondence Record #EI-16349 Correspondence Information <table border="1"> <tr> <td>Docket #:</td> <td>FD 34658.0</td> <td>Date Received:</td> <td>02/01/2009</td> </tr> <tr> <td>Name of Sender:</td> <td>Patricia Vroman</td> <td>Date of Letter:</td> <td>02/01/2009</td> </tr> </table> Submitter's Comments Re: STB Finance Docket No. 34658. Concerning the Alaska Railroad Corporation's Proposed Northern Rail Extension, the Alaska Railroad Corporation's proposed plan to build a new bridge over the Tanana River at the intersection of the Salscha community school. The plan would impact the Salscha community school. The school would lose a major section of its grounds and serve both the local and borough residents and more for ski races. Please do not go ahead with Salscha 2. Residents are concerned about flooding whenever plan is chosen. We hope that the STB/Alaska Railroad will do the best they can to remedy this problem if or when they construct the railroad in the Tanana River area.	Docket #:	FD 34658.0	Date Received:	02/01/2009	Name of Sender:	Patricia Vroman	Date of Letter:	02/01/2009	Comment Number: 40 David Navecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street S.W. Washington, D.C. 20423-0001 Dear Mr. Navecky, Thank you for the opportunity to provide input and comments regarding the proposed Northern Rail Extension for the Alaska Railroad (Docket No. 34658). The Environmental Impact Statement (EIS) is a very long and involved document and requires careful reading. We do not feel that we have had enough time to really do justice to our comments or recommendations and have rushed through them in order to get them completed in time. Below are some of our thoughts and comments, but more time would have been better. In addition to providing these comments, we are requesting 60 day extension of the comment period. There are still many people who were not notified and/or did not see the notices in the newspaper about the meetings. We have some serious concerns with several aspects of the EIS for the Northern Rail Extension (NRE) and what it might mean for the habitat and fisheries in the Tanana River watershed, particularly the Richardson Clearwater (RCW). While we realize there must be some loss of wilderness to extend the railroad, the level of what appears to be "acceptable losses" seems severe. Some areas of the EIS acknowledge problems, but seem to push for the extension without regard for reasonably possible consequences. Our greatest concern with the proposed NRE is the Southern Common Segment (SCS) and the plans to bridge two streams that form part of the headwaters of the RCW. In "Water Quality Study of Richardson Clearwater Creek Near Big Delta, Alaska" (Public Data File 99-21), Mary A. Maurer describes the RCW as "a pristine spring-fed stream" that "is an unusual Interior Alaska stream because of its short length, laminar flow, stable channel, and exceptional clarity." The RCW headwaters are formed by numerous springs, the "largest of which contributes approximately 12 cubic feet per second of flow."¹ In addition to the pristine waters, the RCW hosts a high number of benthic invertebrates (small organisms that are an important food source for fish including many recreationally and commercially important species).² Ms. Maurer states that, "Benthic invertebrate numbers are typically higher in Richardson Clearwater Creek than in other Interior Alaska streams" and goes on to report that due to the "higher and more consistent groundwater input" the "habitat conditions are optimal for benthic invertebrate colonization." In addition, high water clarity, high dissolved gas content, and sufficient nutrient concentrations support abundant plant and animal life.³ Descriptions of the proposed bridges are not readily available, but if they use the same construction methods as the bridges proposed to cross the Tanana River, it seems that there can be catastrophic consequences to the headwaters of the RCW. Assuming use of pilings for the bridge supports, the process of pounding the pilings into the gravel and substrate could damage the aquifers, limiting or changing the flow and output of the springs. Additionally, the compression of the initial pilings and vibration of train use of the trestles could continue to compress the aquifers feeding the springs and changing the rate and/or quality of the water output. If another type of bridge system is to be used for crossing the headwaters, we would like to know more about the design and placement that might be used. While it can certainly be changed, the RCW area, according to the Tanana Basin Area Plan, has been proposed for legislative designation as a Critical Habitat Area. Furthermore, the current plan designates primary use as recreation, but specifies the need "to protect the water quality and habitat of the Richardson-Clearwater drainage and Rainbow Lake."³ Areas of the RCW very close to the proposed headwater crossings are used for recreation by many users. They are popular for fishing, hunting, trapping, camping, and access to Rainbow Lake. The area
Docket #:	FD 34658.0	Date Received:	02/01/2009						
Name of Sender:	Patricia Vroman	Date of Letter:	02/01/2009						

<http://www.stb.dot.gov/ect/1/correspondence.nsf/PublicIncomingByDocketNumber/9C6E9...> 2/2/2009

of river near the "confluences" (where the major springs to be crossed enter the RCW) are a frequent starting point for rafting, canoeing, and float trips. The proposed crossings appear to be within 1/4 mile of the RCW itself and the noise from the trains would disrupt otherwise quiet, peaceful interactions with nature that are currently enjoyed.

7 The EIS identifies the crossing at three streams in the SCS and acknowledges the use of the RCW as an anadromous fish stream. Proposed mitigation takes into account some concerns (pollution, bank erosion, etc.) but does not answer the greater question of disruption of spring flow, continued compression due to vibration, and damage to the RCW due to inevitable sedimentation during the building process and for several years afterward.

8 While the EIS proposes that there will be very little hazardous materials shipped, they will be shipped none-the-less. Additionally, it can be assumed that, as with Fort Wainwright and Etelson, there will be shipments of oil and fuel. Any derailment of hazardous materials and fuels could be disastrous for the RCW, its tributaries, and drainages. The EIS proposes mitigations, but those obviously must take place after the fact. While linings and absorbing materials may be of great use as an end result, they would not be deployed quickly enough to prevent serious damage.

9 It seems that a more direct, shorter, and less critical route would be to run the NRE at or near the Donnelly Training area directly to Delta Junction and/or directly to Fort Greely. While this route may increase construction costs somewhat, it would be more solid by avoiding more permafrost, swamp, and wetlands than the current proposal. Moving the route south would allow continued use of the area by recreational users and hunters without creating trespassing issues for those who want to hunt and fish the Koolie and Rainbow Lake areas. Moving the route south would increase the availability of Military lands for use and access by the Armed Forces. And finally, it would save potential devastation of the RCW, its headwaters, and drainages.

Please consider our thoughts and concerns. Thank you again for the opportunity to provide input. We will email our comments and a hard copy will follow in the mail.

Sources:

1. Division of Geological and Geographical Surveys—Public-Data File 99-21. Water Quality Study of Richardson Clearwater Creek Near Big Delta—Mary A Maurer, March 1999.
2. Ace Basin Biological Resources <http://www.dnr.sc.gov/main/mrri/acechar/benthic.htm>
3. Alaska Department of Natural Resources: Tanana Basin Area Plan for State Lands updated 1991. Primarily Chapter 3-Subregion 7 http://dnr.alaska.gov/nrw/planning/areaplans/tanana/pdf/tanana_basin_area_plan_for_state Lands.pdf

Sincerely,

Bill and Nancy Allen
P.O. Box 58498
Fairbanks, AK 99711
907-488-7372 (hm)

CC:

Chris Milles
Fairbanks Regional Director
DNR—Division of Land, Water, and Mining
3700 University Avenue
Fairbanks, AK 99709

Donald Perrin
Large Project Coordinator
Office of Project Management and Permitting
ADNR50 W. 7th Avenue, Suite 1160
Anchorage, AK 99501-1000

The following are my comments about the Draft Environmental Impact Statement for the Alaska Railroads proposed line extension between Fairbanks and Fort Greely Alaska. First I would like to state that I'm not anti-development and that I believe a future rail route to the lower 48 states through Canada is a positive thing, and in the long run will serve the best interests of the State of Alaska, however I hope that it is completed with good intent and respect for property owners, public land users and fish and wildlife habitat along its route. In particular though, I am concerned with the route that has been proposed within Map Area 5 known as the "South Common Segment". My family and I are property owners on the Richardson Clearwater which is a very important recreational stream located less than a mile north of the proposed route. The Richardson Clearwater is an approximately 10 mile long spring fed stream that supports a diverse habitat for spanning Salmon, Arctic Grayling, Whitefish and Burbot, as well as Moose, Bears, Eagles, Peregrine falcons, an occasional Caribou and many of Alaska's fur barrier species. In addition to these year round critters, the Clearwater also is a cherished recreational area for over 25 families, some of whom live their retirement here May through September of each year. Because the Richardson Clearwater is a spring fed stream, its headwaters consist of a series of marshes and smaller streams that work as a natural filter and catch basin for the drainage. It is this area that appears will be most adversely affected by the proposed route. As proposed, the rail line will be laid right through this critical wetlands, and will span two of the primary streams that feed the Clearwater. Believe me when I say that having a train operating in such a critical area is at best undesirable, however the thought that a single mishap with a train carrying hazardous material that could quickly destroy this beautiful area is considered irresponsible and unacceptable to the private property owners in the area.

As a property owner in the area, and one that is proud to say spends up to 60 days a year recreating in a cabin I built for my

202569000	Surface Transportation B Comment Number: 41 (continued) Duplicate of 77	01:02:50 p.m.	03-05-2009	5 / 6
family, I have some strong concerns about the proximity of the proposed route, including the potential for the substantial noise and vibrations we may now experience as we try to enjoy the solitude that we have for many years worked for and relished. Thus I respectfully ask that the Surface Transportation Board consider mine and others concerns with respect to the proposed railroads location and its impact to the area. While the potential for noise, vibration, and accidental spills are inherent with railroads, the added impact from the construction and daily railroad operations could have an even larger affect on the geology of the area, and one that could significantly alter the fragile aquifer that feeds this beautiful spring fed clearwater stream. Moving the route as far a way as possible from this recreational area, to uninhabited state or federally owned land is a reasonable request given the relatively level terrain encountered, and one that can only help mitigate the impact of a new rail line to the environment and property owners in the area. In early January, I testified to the Transportation Board at a town meeting in North Pole that I would at a minimum, like to see the route follow the existing State Forestry logging road that runs along higher ground south of the Clearwater, which would keep it away from the critical wetlands that are the lifeline of our river. In retrospect I now feel that the line should be moved even further south in this segment to where it's located just within the north boundary of the military operating area. This realignment would help reduce noise, vibration, potential hazardous spills, and hopefully any effects on the aquifer that enables this wonderful, spring fed Richardson Clearwater to exist! In addition, its location within the military operating area would eliminate problems associated with illegal track crossings by outdoor users as the military land is already off limits to the public. Thank you for the opportunity to comment in this forum.				
202569000	Surface Transportation B Comment Number: 41 (continued) Duplicate of 77	01:03:08 p.m.	03-05-2009	6 / 6
Sincerely, Ivar S. Halvarson and family Richardson Clearwater property owner, Alaska 746 9th Avenue Fairbanks, Alaska 99701				

Comment Number: 42 David Navecky STB Docket#34658 Washington, DC 20423-0001 Feb 1, 2009 Mr. Navecky, Please accept my comments below on the Alaska RR Northern Rail Extension Project as submitted as an electronic attachment: The rail corridor must provide for future additional at-grade or as separated grade public crossings to the soon to be established federal ROW. This project will need to account for population growth and increases in public recreational uses that will need to cross this rail corridor. Once the rail corridor is established any "new" crossing or trail that is proposed would be extremely costly to provide based on past occurrences of public need driving an additional legal crossing through an existing corridor. The RR has a nearly exclusive right to restrict access over the ROW. Understanding this is a necessary condition to control risk and hazards, there should be additional ROW crossings at both waterways and surface locations beyond those considered as existing trail / water routes. There needs to be placement or "call out" for placement of legal access crossings to address future additional needs. As a current elected official on the Fairbanks North Star Borough Assembly, I have listened many times to concerns and problems of residents of our community calling for more public access across AKRR ROW. With this Northern Rail Extension Project there will be a new 80 mile restricted ROW, enforceable by law, that sets the number of legal crossing with limited consideration for future needs. Once this rail project's ROW is set, and hopefully narrowed from the current large footage across federal lands, there would be a very large cost to add legal crossings. I do support the rail route that passes closer to Eielson AFB, following the highway corridor, to allow reduced impact to the residents living on ag lands along Eielson Farm Rd. The ADOT has proposed considerable modifications to the Eielson spur and including a mainline rail connection to be included in that construction could possibly further reduce or eliminate the impacts to local residents that have farming interests in the Eielson area. Once this high quality, contiguous acreage on each property is crossed by a rail corridor, access the divided property may be lost and future ag use to produce local foods is lessened. Thank you, Luke Hopkins Seat B Office Holder	Comment Number: 42 (continued) Fairbanks North Star Borough Assembly
1	2
3	3

Comment Number: 44 (continued)

spawn over winter in the creek. The other species use the stream as a summer feeding area. The only access to this creek is by boat or floatplane.¹

The Richardson Clearwater is characterized by its clear and cold water, stable discharge and the fact that it's access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. In a recent study by the Department of Fish and Game², the Ridder Study characterizes the river as follows:

"The Richardson Clearwater River rises from springs located on the southern flood plane of the Tanana River, three km west of Big Delta. The river is 19 km in length and enters the Tanana River 13 km downstream of Shaw Creek. As with other spring fed systems in the drainage, most notably the Delta Clearwater River, the Richardson Clearwater River can be characterized by its clear and cold water, and stable discharge. Access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. The river supports a recreational fishery for Grayling and little chum salmon). The Grayling fishery can be characterized as 'Blue Ribbon' due to it's availability of large fish, high density of fish, aesthetic qualities of the river and lack of direct road access."³

It is clear from the Department of Fisheries Study that the Richardson Clearwater River is a summer feeding grounds for the Arctic Grayling that migrate into the river in Mid May from spawning areas located in the Caribou and Rapids Creek in the Shaw Creek drainage area and the Good Pasture River. Tagging studies have shown that the migration is deliberate and characterized by a strong homing behavior.

With a water quality as documented in Footnote 1, The Water Quality Study, and with an abundance of the four varietal sets of fish as documented in Ridder Studies Footnotes #2 and #3. All of which are attached to this comment, there is no question that the Northern Railway extension at least as far as the south common segment is concerned will impact the existing ecosystem and may very likely have disastrous effects on it.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON WATER QUALITY

The water quality will be impacted by the construction and installation of bridges and culverts in the aquifer and wetlands of the Richardson Clearwater. Sluffing and erosion of the stream banks

¹ See water quality study of the Richardson Clearwater Creek near Big Delta, Alaska by Mary A. Maurer Alaska Division of Mining and Water Management Alaska Hydrological Survey March, 1999 released by State of Alaska Department of Natural Resources Division of Geological and Geophysical Surveys 794 University Ave., Suite 200, Fairbanks, AK. 99709-3645 appended hereto.

²Contributions of Arctic Grayling from Caribou Creek to the Richardson Clearwater River and Shaw Creek, 1980 – 1981 by William P. Ridder. November 1994 Alaska Department of Fish and Game Division of Sportfish Fisheries Data Series 94-49 appended hereto.
³ See Fishery Data Series #120 Age, Length, Sex and Abundance of Arctic Grayling in the Richardson Clearwater River and Shaw Creek 1988 by William P. Ridder Alaska Department of Fish and Game Division of Sportfish, Juneau, AK. 99802.

Comment Number: 44 (continued)

is a given. There will undoubtedly be increased channel scour, bank erosion and down stream sedimentation. It is unclear what effect thermal erosion of cuts made into the perma frost soils will have but one only has to look at the effect of the Carla Lake fires to see what effect the lack of vegetation in the wetland areas in the headwaters of the Richardson Clearwater has already had.

The fear of all of the residents of the Richardson Clearwater Creek is that three bridges, and numerous culverts that are planned, will destroy the aquifers and interrupt the flow of a totally spring fed river that houses numerous species of fish. We have already had one disaster at the headwaters of this river which was the Carla Lake Fire in the summer of 1998. That fire burned approximately 54,000 acres and its effects on the Richardson Clearwater Creek have been annual floods in which the stream flow, organic matter content, turbidity, and color have been affected. The loss of vegetation due to the forest fire has produced an inability of the vegetation (in the headwaters) to contain the waters at times of heavy rains. Complicating this problem with three to four bridges and numerous culverts will very likely produce a complete disaster with regards to water stability, flow and turbidity.

Obviously geotechnical bore holes will provide direct communication between surface water and ground water but no one knows the effect it will have on the aquifers if they are drilled into. The proposed clearing of 251 acres in the south common segment at a time when the vegetation is trying to rebuild itself can only increase the turbidity and sediment loads associated with that action and with the installation of culverts and bridges.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON FISH HABITAT

The Clearwater River supports Coho spawning and rearing. The noise and vibration caused by pile driving and culvert installation will most certainly impact egg mortality and hatching time in areas near the stream crossings. Vibrations are known to negatively impact development on salmonid eggs and at certain times disrupt egg membranes leading to egg death. The most devastating thing that could occur in the Coho run is avoidance behavior which will cause them to abandon their winter spawning grounds.

Vibrations and pile driving activities as well as sediment will most certainly have an impact on the Grayling population who also may change their natural patterns and abandon the upper portions of the Richardson Clearwater.

CONCLUSION

The aquifers and headwaters of the Richardson Clearwater produce the constant flow for the river. Any interruption of this flow by blockage of bore holes, bank erosion and downstream sedimentation will certainly affect the water quality of the Richardson Clearwater as well as the fish habitat for the four species of fish that inhabit that area. There is no question under these conditions which are especially fragile after the Carla Lake fire that the south common segment of the Northern Rail Extension should be placed further south and out of the headwaters of the Richardson Clearwater River. Placing it closer to Rainbow Lake or to the south of Rainbow

Comment Number: 44 (continued)

- 4 Lake would give the railroad almost a straight shot into the Donnelly training area and Fort Greeley using the Delta one alternative segment. There is no reason for the Northern Rail Extension to take the chance of drastically injuring the headwaters of the Richardson Clearwater.
- 5 I would respectfully submit that if the rail extension is acted upon it should be placed much further south and out of the headwaters of the Richardson Clearwater.

Sincerely,



John I. Weston, Jr.

Comment Number: 45

February 2, 2009
Steven and Kathleen Vincent
735 Aspen Heights Drive
Fairbanks, AK 99712

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Subject: STB Finance Docket No. 34658, Alaska Railroad-Northern Rail Extension, Draft EIS Comments

Dear Mr. Navecky,

We are concerned about how the Northern Rail Extension project may affect our property: the 40 property owners on Fivemile Clear Creek (referred to in the report as Fivemile Clearwater River); the creek itself; hunting, fishing, and recreation for all property owners and users in the area; and access to properties and hunting grounds in the area of the creek. The comments we are providing are in regards to the Tanana River crossing near Salcha, the Central Alternatives 1 and 2, and the associated connectors. Specifically, our comments are:

1. Figure 2-17, Tanana bridge Alternative 2, shows a channel blocked with "fill" on the west side of the Tanana to accommodate the bridge. This is the channel that is used to access the mouth of Fivemile Clear Creek. Creek flow alone would not likely be enough to maintain navigability as it spreads over the wide channel bed, so blocking Tanana flow to this channel would cut off summer access to the creek and the 40 properties on it. There is no other reasonable summer access to the creek. Additionally, in reference to this same figure, are concerns about what impact this will have to the fish population on the creek. The grayling migrate annually, and there are annual salmon runs. This alternative could be detrimental to both, thereby leading to serious environmental concerns further up the food chain.
2. Access concerns:
 - a. Figure 13-33 shows one possible crossing of railroad line near the headwaters of the creek and one near the mouth of Fivemile Clear Creek. According to this Draft EIS, crossing the railroad line will not be allowed in other locations. This cuts off winter access to most properties on the creek. The creek doesn't freeze in the winter, so the creek cannot be used as a trail from the crossings upstream or downstream to the properties. Landowners have built their own winter trails where they are needed to

Comment Number: 45 (continued)	
the ADF&G moose biologist, ARRC has provided no specific plan or data regarding this issue.	
9. Putting out Draft EIS just before Christmas is bound to generate less comments due to folks busy with the holidays and holiday travel—environmental document preparers know this yet released this Draft EIS just a couple weeks before Christmas. This seems suspiciously strategic.	12
10. Where are proposed borrow pit sites? Their impacts should be evaluated and addressed.	13
11. The railroad project website is not being updated and when I last checked did not include mention of release of this Draft EIS—an attempt to minimize comments by not making a good effort to get the word out?	14
12. During a wildfire a couple years ago near the area of Fivemile Clear Creek, fire crews said they would not fight fire on the ground if cabins were endangered due to the risk of unexploded ordinance in the area. Unexploded ordinance is not addressed in the section on hazardous materials. At that time ADNOR revealed that the whole area south of the Tanana River from Delta to Nenana was considered by the military to have a HIGH probability of unexploded ordinance scattered throughout. As the fire spread towards Fivemile Clear Creek in 2007, the US Army sent a patrol to sweep a 100' swath around each cabin should it have become necessary to put smoke jumpers on the ground. The draft EIS does not address this eminent danger to human life during the construction or operational phases of the railroad.	15
13. Bald eagles and great horned owls are seen regularly and annually near our cabin located at Lat 64° 19.359' Long 146° 55.712'. Are the nesting sites surveyed and protected?	16
14. Properties in the Fivemile Clear Creek area were distributed and described as "remote parcels" by the State and Borough. The close proximity of a railroad will arguably change the property description as well as the owners' enjoyment of solitude in the Fivemile Clear Creek area for the worse. The Railroad will also limit customary and historic access adjacent State lands thereby further diminishing the recreational and remote value of these properties.	17
Thank you for this opportunity to comment. Sincerely, Steven Vincent Kathleen Vincent	
STB Finance Docket No. 34658, Alaska Railroad-Northern Rail Extension, Vincent Draft EIS Comments	Page 3

STB Incoming Correspondence Record Page 1 of 1 Surface Transportation Board Incoming Correspondence Record #EI-16358 Comment Number: 46 <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="width: 30%; padding: 5px;"> Correspondence Information Docket #: FD 34658.0 Name of Sender: Randall Fletcher Group: </td> <td style="width: 70%; padding: 5px;"> Date Received: 02/02/2009 Date of Letter: 02/02/2009 </td> </tr> </table> Submitter's Comments Dear Sirs I and many of my friends have been using the trails along the Little Delta river and across it for many years. These trails also lead to Koolie and Bull Lakes. Both are popular fishing, hunting and trapping areas. While I support the idea of rail service to aid military training and to begin the process of a rail line to the lower 48, I hope the existing long time users of the trail systems will not be cut off from access. It looks to me like "Donnelly #2" would cause the least conflict and appears to be shorter. That is the route I would support. Regardless of the route chosen access to the long time historical users of the trails should not be restricted. Thanks Randall Fletcher 807-482-3455 Box 38679 Fairbanks AK 99711	Correspondence Information Docket #: FD 34658.0 Name of Sender: Randall Fletcher Group:	Date Received: 02/02/2009 Date of Letter: 02/02/2009	Comment Number: 47 February 2, 2009 David Novecky Surface Transportation Board 395 E Street SW Washington, DC 20423-0001 Re: STB Finance Docket No. 34658 Dear Mr. Novecky: I am writing to provide input on the Northern Rail Extension (NRE) considered in Docket 34658, in particular the segments of the project near the Richardson Clearwater, namely Donnelly 1, Donnelly 2 and the South Common Segment. As a native Alaskan, I have spent my entire life enjoying the outdoors along the Richardson Clearwater. My earliest memories are of boating, fishing, hiking and hunting with my grandfather and father on the water and in the woods of the Clearwater. Today, I am blessed to be property owner on the Clearwater and have begun passing along the same traditions to my daughter and one day, I hope, my future grandchildren. Similarly, as a former staff member in the United States Senate who worked diligently to move the rail extension from Eielson to Fort Greely, I am also intimately aware of the purpose of the NRE. The NRE's purpose was to support the mission of Fort Greely as the northernmost point in our country's missile defense. The strategic location of Fort Greely to Eielson as an operating base as well as its global position for missile defense is unmatched and needs to be supported. However, the proposed positioning of the NRE, specifically Donnelly 1, Donnelly 2 and the South Common Segment can and should be refined in order to mitigate their impact on the environment they will pass through. The NRE can and should be moved further south to reduce impacts on the Richardson Clearwater watershed related to noise, vibration, water siltation, and potential damage to the aquifer during construction and operations in this area. This alignment could start where Donnelly 1 comes out of the Donnelly Training Area (within Map Area 4 of the draft EIS) and would parallel that boundary to the southeast. This would put the South Common Segment four to six miles south of its proposed location eliminating its impact on the Richardson Clearwater and on near-by Rainbow Lake. Another concern of the draft placement of the South Common Segment is its becoming a barrier to land to the south of the rail due to the Alaska Rail Road Corporation's no trespassing policy for its property. In its draft placement the South Common Segment eliminates the ability to safely south of the rail line with recreational vehicles into concentrated trail areas. By bordering the Donnelly Training Area, an area that is restricted to aircraft over flights and restricted as far a ground access, the South Common Segment would ensure the safety of those seeking to enjoy the recreational areas from the Richardson Clearwater south to Rainbow Lake.
Correspondence Information Docket #: FD 34658.0 Name of Sender: Randall Fletcher Group:	Date Received: 02/02/2009 Date of Letter: 02/02/2009		

121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503-2035
Phone: 907 / 276-0700 Fax: 907 / 276-3887 Email: Resources@akrdc.org Website: www.akrdc.org

Comment Number: 49

Surface Transportation Board
Incoming Correspondence Record

#EI-16361

Correspondence Information

Docket #:	FD 34658 0	Date Received:	02/02/2009
Name of Sender:	Stan Leaphart	Date of Letter:	02/02/2009
Group:	Citizens' Advisory Commission on Federal Areas		

Submitter's Comments

On behalf of the State of Alaska's Citizens' Advisory Commission on Federal Aids, and the public, I wish to restate our request for a 60 day extension of the public comment period for the Draft Environmental Impact Statement for the Alaska Railroad Corporation Construction and Operation of a Rail Line between North Pole and Delta Junction, Alaska (STB Finance Docket No. 354548). We believe that the public interest would be served by such an extension. The initial 52 day public comment period is simply inadequate for the public to review and comment on an environmental impact statement that, with appendices, is more than 1100 pages in length.

Federal land management agencies in Alaska routinely provide a minimum 60 day review and comment period for planning documents, environmental impact statements and proposed revisions to regulations and policies. More often, comments periods of 90 or 120 days are provided. The comment period allowed for this document appears to be a pro forma effort rather than a reasonable effort to provide the public with a meaningful review period.

We are particularly concerned that the public may not be fully aware of the restrictions on access across any lands or right of way conveyed to the ARR for this extension. These restrictions would prevent the public from accessing public lands that are regularly used for hunting, fishing and other activities. Additional time to review this proposal and identify essential access across the right of way is needed.

While we understand that the Department of Natural Resources is working on the issue of public access to state owned lands, it is unclear if a similar effort is underway for access to federal public lands. These lands are important for recreational and subsistence hunting and fishing.

We again urge you to extend the public comment period for an additional 60 days. Additionally, consideration should be given to holding additional public meetings which focus primarily on the access issue to both state and federal lands. Thank you.

We again urge you to extend the public comment period for an additional 60 days. Additionally, consideration should be given to holding additional public meetings which focus primarily on the access issue to both state and federal lands. Thank you.

into holding additional public meetings which focus primarily on the access issue to both state and federal lands. Thank you.

Stan Leaphart
Executive Director
Citizens' Advisory Commission on Federal Areas

Executive Director
Citizens' Advisory Commission on Federal Areas
Stan Leaphart

THE UNIVERSITY OF CHICAGO LIBRARY

<http://www.stb.dot.gov/ect1/ecorrespondence.nsf/PublicIncomingByDocketNumber/029D3...> 2/4/2009

STB Incoming Correspondence Record Page 2 of 2 Comment Number: 50 (continued)	More studies should be initiated to ensure the sustainability of the water quality, androgenous fish species, wildlife habitat and possible catastrophic effects on Critical Habitat Areas. Studies should also be done that are more current than those referred to in the EIS as mother nature has changed many characteristics of the Richardson Cleanwater if not other streams subject to the impacts of the railroad implementation. More studies to the noise and vibration impact the rail line this close to a populated recreational stream will have on seasonal (summer) residents and retirees in this area as well as the wildlife that frequent the Richardson Cleanwater and areas surrounding this area. Please consider our suggestions and those from all who are concerned about the effects of the construction and continued use of the railroad. We certainly do not oppose the construction of the railroad but we do object to the proposed location especially of the South Common Segment. We do object firmly to the construction of a road along side or in conjunction with the railroad. We would need more time to adequately review the EIS in regards to the use and necessity of a road. Therefore, we request an extended comment period for this purpose. Respectfully, Ted and Tracy Morphis Attachments: Map of South Common Segment Cc: Chris Miles, Fairbanks Regional Director State of Alaska Department of Natural Resources Division of Land, Water and Mining 222 W. 7th Avenue Fairbanks, AK 99709	Image Attachment(s) ADFG NRE DEIS Eastern.jpg NRE-EIS.docx	ADFG NRE DEIS Eastern.jpg NRE-EIS.docx	http://www.stb.dot.gov/cet/1/correspondence.nsf/PublicIncomingByDocketNumber/E3AC3... 2/4/2009
Comment Number: 51	Toni Claxton 484 Ruth Estates Road Fairbanks, Alaska 99712 907-459-4147 David Navecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street S.W. Washington, DC 20423-0001 Re: Northern Rail Extension Draft EIS Mr. Navecky, I appreciate the opportunity to be able to comment on the NRE Draft EIS. I have many concerns with this project, which are addressed below. I am a life-long Alaska resident of 48 years, life-long user, hunter and fisherman in the proposed use area, a wife and mother of 28 and 24 years respectively, and a bookkeeper by trade for 28 years. As a bookkeeper, I do understand cost/benefit issues, but otherwise have no qualifications to intelligently address engineering considerations or the associated costs. However, I have spent a considerable amount of time reading thru the majority of the information provided in the 1,100+ page Draft EIS and attempting to intelligently digest the suggested proposals, alternatives, and mitigation measures. Over the years I have had the opportunity to visit many other areas of this country, as well as traveling to Europe (Italy), and driving the ALCAN thru Canada. My travels, rather than furthering my initial belief that "the grass is greener on the other side" have instead convinced me, absolutely, that I live in and enjoy one of the most beautiful and unique places anywhere. However, the reason I am fortunate enough to have been born here is the result of economic progress. My grandparents moved here in the 30's to work on the DEW line because there was no work in the lower 48 in the Depression years. So I do understand the importance of economic survival. In the 30's, it didn't matter. If it paid, you did it. In the years since recovering from that devastation, we have realized that the cost of progress, by the cheapest means possible, can sometimes not be recovered. Water is essential...I would strongly urge you to consider the benefits versus the cost or inconvenience of this proposed project. If the available options are to build a railroad along this proposed route as cheaply as possible as the only means to provide food or fuel to a starving community, the risk of possibly damaging an essential and in some areas unique aquatic source for the whole interior of the state, and even as far as anadromous salmon, that are a food source for people statewide and worldwide, would unquestionably be worth it. Taking that same risk to provide an alternative freight and passenger service to the current safe and reliable existing transportation corridor of the Richardson	1	1	

Comment Number: 51 (continued) Highway seems to me to be driven purely by profit motivations. I have been travelling the road between Fairbanks and Delta for the last 48 years, and do not know of one line it has been closed. And how the ARRC expects this proposal to be profitable is still unclear to me. The existing ARRC line between Anchorage and Fairbanks operates 1, yes 1, roundtrip service a day (ARRC Reservations website) even in the summer, the height of tourist season...between the two largest cities in the state, hauling thousands of tons of fuel, freight from hundreds of incoming cargo containers, and thousands of tourist passengers in the summer. Yet the proposal suggests a maximum of five roundtrips per day between Fairbanks and Delta, a community of approximately 1,000 (2005 Census Bureau)? It seems much more likely to me that the purpose of the project is either as a necessity to national defense by providing better access to the military training grounds of the Tanana Flats training area and the Donnelly training area, and a more secure route for missile transport to Ft. Greely, or in expectation of connection with an eventual Alaska-Canada rail line with possible connection to an Alaska-Canada gas line. If it is required for national defense, then by all means it needs to be built. If it will eventually serve as a connector to a transportation corridor thru Canada from the Lower 48, and possible materials transport for gas line construction and operation, the profit potential is probably huge and they are wise to pursue it. But if either of those are the case, I would like to respectfully request that you consider a new alternative route for the portion of the line that runs from the Tanana River bridge crossing south to Delta Junction. Moving the line approximately 12 miles to the southwest from the south side of the Tanana bridge would allow them to run on almost a straight line into Delta Junction, thereby moving that entire portion of the line 5-10 miles away from the Tanana River and the many freshwater streams that feed into its south bank. My reasons are the following.	area due to excessive rainwater runoff. How stable is that going to be with tons of locomotive criss-crossing it up to 5 times a day? 2. Land Use - The currently proposed routes, all of them, effectively cut off hunters and outdoorsmen from access to one of the most heavily used areas, in one of the most prolific game management units, of the state. Moving the line further to the southwest would allow them uninterrupted access to more of that land. Wouldn't that be easier than trying to police limited allowed crossings that people are going to attempt? 3. Safety - As part of the anticipated freight service, I would expect the railroad would be transporting fuel. It is also mentioned that transportation of other hazardous materials would be anticipated. While the ARRC over the last 10-6-8 years has a great record for spills (only one), and extensive and up-to-date spill response plans, accidents happen. Why risk the potential of even one spill, with the potential to contaminate, damage and possibly destroy some aspects, of so many waterways that are so important to the anadromous fish population of the interior, as well as the hundreds of lower Tanana and Yukon personal and commercial harvesters? And the potential contamination of potable water sources for hundreds of users of these clearwater streams? Moving the line farther away from all of these streams would help minimize, if not eliminate, that possible damage. 4. Biological Resources - The majority of the proposed route crosses hundreds of miles of critical fish habitat and wetlands. The majority of the Clearwater streams that feed into the south bank of the Tanana are spring-fed, fed from upwellings, or artesian fed. The dozens of crossings of these streams and wetlands will cause considerable increased sediment drainage, possible bank erosion, and runoff or upwelling blockage. The proposed culverts will help mitigate those consequences, moving the whole line further away will almost completely eliminate the need for many of those crossings. The ground further to the southwest is primarily silt, moraine, and permafrost. None of which is critical habitat for fish, anadromous fish, wildlife, or people. 5. The Draft EIS has identified several anadromous streams from the Anadromous Fish Catalog (ADF&G Sport Fish Division). However, I have learned from discussions with Jim Durst that because anadromous fish seek out upwelling and spring-fed waterways, it is very likely that the dozens of other clearwater streams along the south bank of the Tanana are also critical spawning and/or rearing habitat for several species of salmon that Fish & Game just hasn't yet surveyed. Why take the chance of damaging any of them, when moving the route 10 miles or so away moves eliminates the need to cross over any of them? This most concerns me in regards to the 2 tributaries of the Richardson Clearwater that the proposed route would cross. Ask anyone who has been there. The Clearwater is a truly unique stream, even in a state full of unprecedented beauty. A clear, spring-fed, navigable stream in the
Comment Number: 51 (continued) Highway seems to me to be driven purely by profit motivations. I have been travelling the road between Fairbanks and Delta for the last 48 years, and do not know of one line it has been closed. And how the ARRC expects this proposal to be profitable is still unclear to me. The existing ARRC line between Anchorage and Fairbanks operates 1, yes 1, roundtrip service a day (ARRC Reservations website) even in the summer, the height of tourist season...between the two largest cities in the state, hauling thousands of tons of fuel, freight from hundreds of incoming cargo containers, and thousands of tourist passengers in the summer. Yet the proposal suggests a maximum of five roundtrips per day between Fairbanks and Delta, a community of approximately 1,000 (2005 Census Bureau)? It seems much more likely to me that the purpose of the project is either as a necessity to national defense by providing better access to the military training grounds of the Tanana Flats training area and the Donnelly training area, and a more secure route for missile transport to Ft. Greely, or in expectation of connection with an eventual Alaska-Canada rail line with possible connection to an Alaska-Canada gas line. If it is required for national defense, then by all means it needs to be built. If it will eventually serve as a connector to a transportation corridor thru Canada from the Lower 48, and possible materials transport for gas line construction and operation, the profit potential is probably huge and they are wise to pursue it. But if either of those are the case, I would like to respectfully request that you consider a new alternative route for the portion of the line that runs from the Tanana River bridge crossing south to Delta Junction. Moving the line approximately 12 miles to the southwest from the south side of the Tanana bridge would allow them to run on almost a straight line into Delta Junction, thereby moving that entire portion of the line 5-10 miles away from the Tanana River and the many freshwater streams that feed into its south bank. My reasons are the following. 1. Noise and Vibration - The definition of "sensitive receptors" in Title 49 includes "retirement communities". The Richardson Clearwater runs parallel to and within 1/4 to 2 miles of the south end of Donnelly 1 and 2, and the north end of the South Common segments. There are currently 7 retired couples who make their summer homes on the Clearwater for 5-6 months during the year, 7 days a week, 24 hours a day. Most of them have owned their property for 20+ years, and some, like my parents, for over 50 years. In addition, I know of at least 8 other couples who plan to one day do the same. One of many reasons they chose these cabins as their retirement homes, or in anticipation of such, is because of the quiet and solitude of the area. That would be shattered by 5 roundtrips per day from a locomotive running thru their "backyards". Especially if whistles are allowed. 2. Additionally, I don't believe from the information contained in the Draft EIS that the consequences of the continual vibration from railroad operations on the underlying groundwater system and spring-fed aquifer that feeds this river has been definitively determined. Much of the line in this area is proposed to be built on ground decimated of vegetation by the 1998 Carla Lake Fire, and is subsequently experiencing sloughing of slopes in the	area due to excessive rainwater runoff. How stable is that going to be with tons of locomotive criss-crossing it up to 5 times a day? 2. Land Use - The currently proposed routes, all of them, effectively cut off hunters and outdoorsmen from access to one of the most heavily used areas, in one of the most prolific game management units, of the state. Moving the line further to the southwest would allow them uninterrupted access to more of that land. Wouldn't that be easier than trying to police limited allowed crossings that people are going to attempt? 3. Safety - As part of the anticipated freight service, I would expect the railroad would be transporting fuel. It is also mentioned that transportation of other hazardous materials would be anticipated. While the ARRC over the last 10-6-8 years has a great record for spills (only one), and extensive and up-to-date spill response plans, accidents happen. Why risk the potential of even one spill, with the potential to contaminate, damage and possibly destroy some aspects, of so many waterways that are so important to the anadromous fish population of the interior, as well as the hundreds of lower Tanana and Yukon personal and commercial harvesters? And the potential contamination of potable water sources for hundreds of users of these clearwater streams? Moving the line farther away from all of these streams would help minimize, if not eliminate, that possible damage. 4. Biological Resources - The majority of the proposed route crosses hundreds of miles of critical fish habitat and wetlands. The majority of the Clearwater streams that feed into the south bank of the Tanana are spring-fed, fed from upwellings, or artesian fed. The dozens of crossings of these streams and wetlands will cause considerable increased sediment drainage, possible bank erosion, and runoff or upwelling blockage. The proposed culverts will help mitigate those consequences, moving the whole line further away will almost completely eliminate the need for many of those crossings. The ground further to the southwest is primarily silt, moraine, and permafrost. None of which is critical habitat for fish, anadromous fish, wildlife, or people. 5. The Draft EIS has identified several anadromous streams from the Anadromous Fish Catalog (ADF&G Sport Fish Division). However, I have learned from discussions with Jim Durst that because anadromous fish seek out upwelling and spring-fed waterways, it is very likely that the dozens of other clearwater streams along the south bank of the Tanana are also critical spawning and/or rearing habitat for several species of salmon that Fish & Game just hasn't yet surveyed. Why take the chance of damaging any of them, when moving the route 10 miles or so away moves eliminates the need to cross over any of them? This most concerns me in regards to the 2 tributaries of the Richardson Clearwater that the proposed route would cross. Ask anyone who has been there. The Clearwater is a truly unique stream, even in a state full of unprecedented beauty. A clear, spring-fed, navigable stream in the

Comment Number: 51 (continued)

interior of Alaska. Very rare. A stream that has also been documented as important spawning and rearing habitat for both Cohoe and Chum salmon. Why is it necessary to risk screwing that up?

5. The Road – The NRE proposal includes plans for an access road to run the full length of the line. I can't figure out why this would be necessary? I have been told that it would be turned over to the military after the line is completed. Why would they need it? One of the anticipated uses for the rail line is said to be to give the military better access to their training grounds. Don't they already have that with the rail line? What could they need to transport that they couldn't put on a flatbed railcar? Another suggested purpose is for the ARRC to use the road for maintenance. Why would they need that? As I understand it, they use their own railroad to perform maintenance on their current track system. Why would this be any different? It seems to me a road would just invite further temptation for "unauthorized" use by the general public to reach the Tanana flats hunting grounds they will be cut off from by the rail line. And maybe the money saved from not building the road would help offset any added cost to building a line further southwest?

6

In conclusion, I would again like to thank you for considering my input. I have attached 2 maps for your consideration. One shows a proposed route for the entire line, and one for just the Donnelly-South Common-Delta segments.

I would like to make one last request. It would be helpful if the comment period could be extended. A little over a month is an inordinately short amount of time to review the entire 1,100+ page Draft EIS, and do any additional research. And I know there are many people along the proposed route who are not aware of the possible impacts of the project on their use of the area.

7

Sincerely,

Toni J. Claxton

Cc: Donald Perrin
Large Project Coordinator
Office of Project Management and Permitting
ADNR50 W. 7th Avenue, Suite 1160
Anchorage, AK 99501-1000
907-269-7476

Chris Millis
Regional Manager
ADNR Div of Mining, Land & Water
3700 Airport Way
Fairbanks, AK 99709

NRE Tanana River Bridge to Delta Junction Suggested Route

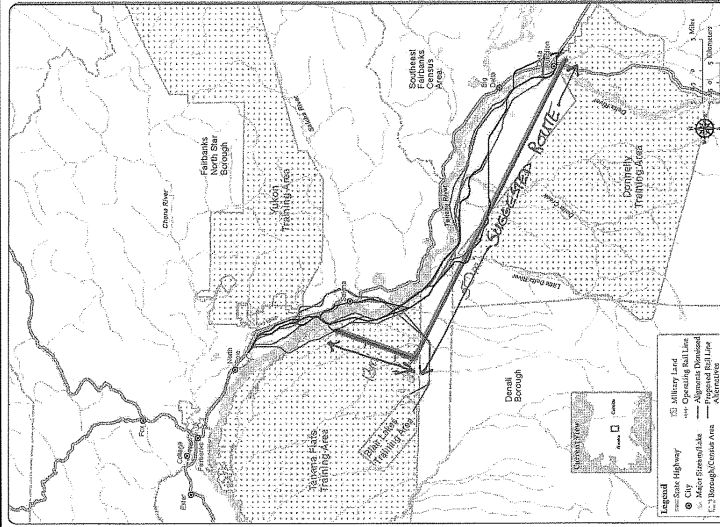


Figure 9
Overview Map of ARRC's Alignments Considered

EI - 16364

Comment Number: 52

To: naveckyd@stb.doi.gov
cc: "Fogels, Edward J (DNR)" <ed.fogels@alaska.gov>, "Ogan, William S (DNR)" <scott.ogan@alaska.gov>
bcc: lina.cunning@alaska.gov, alainai@scs.alaska.net

"Leaphart, Stanley E (DNR)" <stanley.leaphart@alaska.gov>
v>
01/29/2009 02:38 PM



Subject: Extension of Comment Period STB Finance Docket No. 34658

History: 09 This message has been replied to and forwarded.

Mr. Navecky, On behalf of the State of Alaska's Citizens' Advisory Commission on Federal Areas, I am writing to request a 60 day extension of the public comment period for the Draft Environmental Impact Statement for the Alaska Railroad Corporation Construction and Operation of a Rail Line between North Pole and Delta Junction, Alaska. We believe that the public interest would be served by such an extension. The initial 52 day public comment period does not provide adequate time for the public to review and comment on a proposal of this scale.

We are particularly concerned that the public may not be fully aware of the restrictions on access across any right of way conveyed to the ARR. These restrictions would prevent the public from accessing public lands that are regularly used for hunting, fishing and other activities. Additional time to review this proposal and identify essential access across the right of way is needed.

We urge you to extend the public comment period for an additional 60 days. Additionally, consideration should be given to holding additional public meetings which focus primarily on the access issue. Thank you.

Stan Leaphart
Executive Director
Citizens' Advisory Commission
on Federal Areas
3700 Airport Way
Fairbanks, AK 99709
(907) 374-3737

1

2



Comment Number: 51 (Continued)

Donnelly-South Common-Delta
Suggested Route

Comment Number: 51 (Continued)

Comment Number: 53  "richard or may bishop" <rmbishop@alaska.net> 02/03/2009 12:11 AM To: <David.Navecky@stb.dot.gov> cc: "Alaska Outdoor Council" <aoc@alaska.net>, "Wayne Nicolis" <wnicolis@gci.net>, "Byron Haley" <bwhaley@gci.net>, "Dare Aulman" bcc Subject: Northern Rail Extension environmental review process Dear Mr. Navecky: I am providing comments on the review process on behalf of the Alaska Outdoor Council (AOC). The AOC is a statewide umbrella organization comprised of about 45 outdoors clubs and over a thousand individual members, with a total membership of about 10,000. The AOC's main purposes are to advocate scientific State management of fish, wildlife and their habitats, and the opportunities for the public to access and use those resources consistent with Alaska's constitutional protection of common use and equal access in the use of Alaska's renewable resources on a sustained yield. First, I wish to note that the timing and duration of the comment period was too short at 45 days, and ill-timed, considering its overlap with traditional holidays compounded by the diversion of the inauguration of a new president. Having inquired with the Citizens Advisory Commission on Federal Areas about the state of the review process, Mr. Leaphart forwarded your email to me in which you responded to his request for extended opportunities for public input. I was surprised to learn that your Board apparently feels comfortable with the information you've received, since from what I've gleaned since returning to the State a week ago, many local people are not at all comfortable with what they learned about physical characteristics of the proposal and particularly regarding the paucity of firm proposals for year around outdoor access across the proposed railroad right of way. Your email recommends contacting the Alaska Department of Natural Resources about public access on state lands. That is good but incomplete advice, since traditional outdoor access by various means involves substantial areas of federal lands on the Tanana Flats. Based on local feed-back about the consideration given to providing for public access to vast areas of both state and federal public lands, I am concerned that the importance of public access across the proposed railroad route and the potential effects on local resources and resource uses may be underestimated.	Comment Number: 53 (continued) I recommend that your Board check their assumptions about the adequacy of public input, and reconsider extending those opportunities. Thank you. Sincerely, Richard H. Bishop, President Alaska Outdoor Council P.O. Box 73902 Fairbanks, AK 99707 Ph: 907-465-6151 (h)
--	--

Comment Number: 54 Fairbanks North Star Borough <i>Office of the Mayor</i> 809 Pioneer Road P.O. Box 71267 Fairbanks, Alaska 99707-1267 907/459-1300 Fax 907/459-1102 Email mayor@co.fairbanks.ak.us <i>EL - 16366 Rec'd 2/3/09</i> February 2, 2009 David Navecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street S.W. Washington, DC 20423-0001 RE: <u>Northern Rail Extension Draft EIS</u> Dear Mr. Navecky: Fairbanks North Star Borough appreciates the opportunity to comment on the Northern Rail Extension Draft EIS. FNSB supports the development of the Northern Rail Extension and views it as a critical economic development project for the Borough and the State of Alaska. It is also a nationally significant transportation project, which will support military training and ongoing development at Ft. Greely. Based on our review of the draft EIS, we would like to forward the following comments: <u>2.12 (Figure) Richardson Highway and Salcha School Relocation</u> FNSB opposes the Salcha 2 Alignment, which would require the relocation of Salcha Elementary School. This would be a severe hardship for the Salcha Community, as this is the only elementary school in the area. In addition, a native cemetery for the Salchaket Band of Athabascans is located on the south end of the ridge as well as an archeological site. Both have significant importance to the history and culture of the State of Alaska and should be avoided. <u>4.2 Surface Water</u> The subsection on Excavation of Gravel Pits discusses material sources for this project. Later in Section 4.5 the draft EIS elaborates on what is proposed. It discusses 560 acres of borrow pits, one 17 acre pit every 2.5 miles, for a total of 33 borrow pits. There is no discussion on any reclamation of the pits. Certainly a number of these pits could be in locations where they could be reclaimed for recreational uses. Many pits originally dug for road projects are now very popular roadside fishing ponds. This project seems to offer similar potential. Perhaps a centralized larger pit could be provided to ultimately	Comment Number: 54 (continued) Letter to David Navecky, Surface Transportation Board February 2, 2009 Page 2 of 4 be developed into a Chena Lakes type facility for Delta Junction. Reuse of these material sites should be addressed by the plan and included in the mitigation measures. <u>4.5.2 Environmental Consequences</u> On page 4-55 of the EIS states "Construction of the rail line would require that the 200 foot ROW be cleared of surface vegetation." While it is understandable that much of the corridor would be cleared to provide visibility to avoid moose strikes etc., there should be some sensitivity to adjacent land uses. One area of particular concern is the proposed alignment adjacent to Pledriver Slough. Hopefully some buffers will be mandated for well used recreational sites like this, that would supersede a blanket 200 foot clear-cut. This should be addressed by a mitigation measure. <u>4.6 Floodplain Resources</u> Is it anticipated the construction of the new rail corridor will either positively or negatively impact flooding in the Salcha area? <u>11. Transportation Safety and Delay</u> The existing crossing of the Richardson Highway to serve Eielson AFB does not seem to be addressed. Would this project modify the existing crossing? Is a grade separation proposed as part of this project? <u>20.2.10 Land Use</u> While there is discussion on access to trails, the Draft does not really deal with preserving existing legal access for local roads. There are no diagrams depicting land ownership and local dedicated roads. It is our understanding that crossings will be limited by the anticipated speed of the trains, thus presenting a significant impact to the people who will either be separated from their property by the right of way acquisitions or forced to travel great distances to get to their farms or homes, depending upon the circumstances. The railroad has a number of crossing tools to allow and control access, from elevated crossings to gates and lights, and culverts. The assessment needs to more specifically identify how they can deal with existing crossings and allow for future access where none presently exists. Public road rights-of-way need to be protected by the process. Adequate crossing locations need to be provided to ensure that the proposed rail corridor will not eliminate existing recreational opportunities on the other side of the corridor. The EIS states: "Many of the alternate segments west and south of the
1	4
2	5
3	6
	7
	8

Comment Number 54 (continued)

Letter to David Navecky, Surface Transportation Board
February 2, 2009
Page 3 of 4

Tanana River would include long stretches with no designated public crossing points. Without creation of trail crossings along these long stretches, public access across the rail ROW would be significantly restricted or prohibited. We are in agreement with this statement and support the concepts regarding crossings that were recommended in SEA's Preliminary Mitigation Measures for 20.2.10 Land Use. We would, however, like to see some of the required mitigation measures strengthened.

Here are comments on particular SEA recommendations:

56) Recommends the applicant "consult" with U.S. Army Corps of Engineers and other agencies regarding impacts and mitigation regarding a planned project associated with the Moose Creek grade separation. We would like to see stronger wording requiring incorporation of the project into Northern Rail Extension project

60) Requires the applicant "consult" with agencies to provide enough bridge clearance for passage of recreation watercraft. This should include the provision that any crossings of waterways will be constructed with at least the minimum clearances recommended by the agencies.

61) Good start, but this recommendation needs to be strengthened and expanded. It again requires the applicant "consult" with agencies, but it should also require construction of crossings for legal trail easements. It goes on to "include discussion of general dispersed-use access, informal trails on state land, blazed section lines, and long stretches of rail line without designated public crossings." This needs to go beyond "discussion". There needs to be a requirement for legal crossings at some minimum interval to provide for general access across the corridor.

62) This covers the main trails that the proposed corridors would cross that we are aware of within the Borough.

63) The "shall consider" wording does not provide much assurance. They should have to provide crossings to accommodate the named trail facilities. In some cases, the aforementioned crossings at minimum distance spacing may be adequate.

Overall

The draft EIS does a comprehensive job of analyzing many of the potential impacts of the rail extension corridor. The mitigation measures proposed by the applicant and SEA in Section 20.2 address the majority of the impacts of the project. Additional work needs to be done to explain where crossings of the corridor will be provided to accommodate existing and future roads and trails and crossings in general. This should

Comment Number 54 (continued)

Letter to David Navecky, Surface Transportation Board
February 2, 2009
Page 4 of 4

include the type and design of crossings proposed and the time frame for construction. The Fairbanks North Star Borough supports the Alaska Railroad's preferred Eielson 3 option, the Alaska Railroad's preferred Saichu 1 option, and does not express an opinion on the Connector and Donnelly options.

Fairbanks North Star Borough fully supports the project to extend the Alaska Railroad to Delta Junction. We thank you again for the opportunity to provide comments and anticipate that our comments will be addressed in the final EIS for this project.

Sincerely,



Jim Whittaker, Mayor

JW/tb-csm

202559000 Surface Transportation B Comment Number: 56 01/14/10 02-12-2009 2/9
 E1-16378 Reid 2/9/09

WHOLESALE
 Laundry, Warehousing, Industrial Supplies & Equipment, Restaurant
 Supplies & Equipment, Paper Products, Equipment Rental, Cigarettes and Concessions
 2825 PHILLIPS FIELD RD. • FAIRBANKS, AK 99709-5509 • (907) 452-2198 • FAX 451-6411
 awesale@awesale.net www.awesale.com

January 30, 2009

Mr. David Navecky
 STB Finance Dept. No. 34658
 Surface Transportation Board
 395 E. Street, S.W.
 Washington, D.C. 20423-0001

Mr. Navecky:

During the latter part of 2008 the Alaska Railroad announced some of its future plans for the expansion of the existing rail system in various locations throughout the State of Alaska. One of the plans that came to light was an 80-mile rail running west to east in the interior of our state. This addition would begin in a small city called 'North Pole'. It lies approximately 15 road miles east of Fairbanks. From North Pole it would continue eastward towards Delta, AK, and then to a 'Strategic Military Installation' called Ft. Greely, AK. Three proposed routes were mentioned and suppose to be under consideration.

When this news was made public a group of citizens gathered together to discuss the plus'es and minus'es of the 3 proposals. This group of people, which includes myself, is commonly referred to as the 'Shaw Creek Boat Owners' or the Richardson Clearwater Property Owners'. This group which consists of thirteen property owners on the Richardson Clearwater immediately began to scrutinize the AR's intentions.

In early to mid December everyone was notified of a public hearing that was to take place on January 12, 2009. Most of our group, except those that leave for the winter, attended the hearing. Upon arrival we were informed that the railroad had basically discarded 2 of the 3 routes and were focusing there efforts on one. The one they picked was the least desirable of the original 3. The railroads choice would not just have a detrimental effect on a large group of citizens but also on the environmental health of the area which would have to be torn apart for construction purposes.

Before going any further I would like to state that neither myself nor any of our group is against the expansion sought by the railroad. We are apposed to the railroad's plan that the expansion be done through the proposed route that follows existing rivers and streams, fisheries, and the underlying equifers that feed this entire environmental haven.

Kawasaki
 Let the good times roll!

**2009 Alaska
 Program of Pro**

Your input is important to the Alaska Railroad as we pursue
 Please write legibly (printing is appreciated). A

Bill Larry

Alaska Fun Center
 Snowmobiles, Motorcycles, ATVs, Jet-skis
 1817 College Rd.
 Fairbanks, AK 99709
 907-452-2455
 www.alaskafuncenter.com

Name **BILL LARRY** Phone **(907)452-6389**
 Address **1553 BRIDGEWATER DR.
 FAIRBANKS AK 99709** Email **blarry@alaskafuncenter.com**

Your Comments:

To Whom it May Concern:

I am deeply concerned about the proposed railroad plans crossing near Koole Lake area. I personally run a trap line across the Tanana River next to the Little Delta River which I cross the Little Delta River by the bluff. I also trap on the trail to Koole Lake and Bull Lake (next to Koole). I own a cabin on Koole and have many trails around the area. I have trapped and fished this specific area well over 25 years. I want to make sure the Railroad system would provide access to these areas and does not try to close off my access nor anyone else's. Thank you.

Many nature enthusiasts such as, fishermen, hunters, dog mushers, snowmachiners, use these trails, and not to mention the Fish and Game who stocks this lake for the public. We do not want to see any access denied to this part of Alaska. The proposed Route, Donnelly II, appears to be a better planned route, considering there is less access restricted and is shorter.

Thank you,
 Bill Larry

Alaska Fish & Game Advisor
 Board, Fairbanks

The Alaska Railroad welcomes your input. Please send your written comments:

ARRC's TTY/TDD 265-2620
 or voice 265-2494
 Alaska Railroad Corporation
 P.O. Box 107500
 Anchorage, AK 99510-7500

voice 1-800-770-8255

Fax (907) 265-2365



public_comment@akrr.com

2025659000 Surface Transportation B Comment Number: 56 (continued)	01:44:57 p.m. 02-12-2009 3/9
2025659000 Surface Transportation B Comment Number: 57	01:46:12 p.m. 02-12-2009 4/9 E1-16379 Rec'd 2/19/09 22 JANUARY 2009
PHILIP F. POPE 1301 67TH ST SE #21C AUBURN, WA 98002	Located within a half mile distance from the ARR proposal is a clearwater stream, approximately 8 miles in total length, earlier referred to as the 'Richardson Clearwater'. This stream only exists because of the underground aquifers that feed its headwaters. The water is crystal clear and can be consumed without fear of getting ill. Numerous individuals and families have been visiting this area since the early 1900's. Entire families have grown up enjoying the Richardson Clearwater. Other entities such as farms, private residences, and small businesses could be or would be affected. They are in no way related to or even close to the environmental issues surrounding this ARR proposal.
DAVID NAVECKY SECTION OF ENVIRONMENTAL ANALYSIS, SURFACE TRANSPORTATION BOARD 395 E STREET, SW WASHINGTON, DC 20423-0001	While at the January 12th public hearing I personally asked a gentleman, representing the ARR, to respond to the following question. 'Isn't the sole purpose of this extension is to carry all the available freight to Ft. Greely and capitalize on the revenues paid to it by the Military.' His answer was 'YES'. For the railroad to suggest that it would provide a needed source of passenger transportation for people traveling from the Delta/Greely area is ludicrous.
SUBJECT: STB FINANCE DOCKET # 34658 DEAR MR. NAVECKY; BELOW ARE MY COMMENTS CONCERNING THE PROPOSED ARR EXTENSION	If a part of the premise for this extension is to provide needed alternatives to the use of our public highway system, it is a smokecreen.
1. SINCE 1963 THE RICHARDSON CLEARWATER HAS BEEN A PART OF MY LIFE. EACH SUMMER AND MOST FALLS I'VE SPENT TIME THERE. MY FAMILY AND I HAVE SPENT A LOT OF TIME HIKING, FOUR WHEELING, FLYING AND BOATING THE AREA FROM SHAW CREEK TO KOOLE LAKE TO RAINBOW LAKE TO THE CLEARWATER. EACH SUMMER SINCE 1995 WE HAVE MADE OUR HOME THERE. THE RICHARDSON CLEARWATER IS A UNIQUE ECO SYSTEM WITH IT'S SUMMER POPULATION OF FEEDING GRAYLING, WHITEFISH, CHUM AND KING SALMON AND LARGE RUN OF SILVER SALMON IN LATE FALL.	My closing remarks have to do with the timing of the announcement by the ARR about the pending routes and the public hearings. It seems that it was quite convenient for them to have their hearings and public response times during the height of our fishing season. Thanksgiving, Christmas, New Years, and the beginning of the season for the Rocky Mountain elk hunt. I think that the timing was intentional and would limit the ability of the public to respond.
2. SINCE THE CARLA LAKE FIRE REMOVED MOST OF THE VEGETATION FROM THE HEAD WATERS AREA OF THE RICHARDSON CLEARWATER, THE SOIL DOES NOT HOLD GROUND WATER AND THE RICHARDSON CLEARWATER HAS FLOODED TWICE IN THE LAST THREE YEARS DURING PERIODS OF HEAVY RAIN. THE SOIL IS VERY UNSTABLE IN THE AREA OF THE BURN.	We need more time to investigate the possible impact that could result from the current intentions of the ARR. I thank you for your time and consideration regarding this issue.
3. THE RICHARDSON CLEARWATER IS COMPOSED OF SEVERAL UNDERGROUND SOURCES. THEIR DEPTH, DIRECTION OF FLOW ETC. IS UNKNOWN. PENETRATION INTO ONE OR MORE OF THESE DURING CONSTRUCTION WOULD HAVE DISASTROUS RESULTS POSSIBLY CHANGING THE ROUTE OF THE CREEK.	Respectfully,  Wayne W. Walther
4. HAZARDOUS MATERIAL SPILLS OF ANY KIND FROM THE EASTERN CONFLUENCE OF PROPOSED DONNELLY 1 AND DONNELLY 2 TO A POINT PAST THE HEAD WATERS OF THE RICHARDSON CLEARWATER ON THE SOUTH COMMON SEGMENT WOULD DRAIN INTO THE RICHARDSON CLEARWATER DUE TO THE SLOPE OF TERRAIN IN THAT AREA. IT IS A BURNED OVER AREA WITH NOTHING TO HOLD A SPILL.	
5. WITH THE PROPOSED NUMBER OF TRAINS A DAY, UP TO FIVE, NOISE AND VIBRATION WOULD BE A PROBLEM. VIBRATION COULD DAMAGE THE	

202559000	Surface Transportation B	01:45:29 p.m.	02-12-2009	5/9
Comment Number: 57 (comment)				

UNDERGROUND AQUIFERS.

6. ACCESS TO RAINBOW LAKE AND KOOLE LAKE WOULD BE BLOCKED OR RESTRICTED BY PROPOSED ROUTE OF DONNELLY 2. THE DONNELLY 1 ROUTING IS SO CLOSE TO KOOLE LAKE AND WOULD ALLOW FOR POTENTIAL HAZARDOUS SPILLS AND CONTAMINATION OF THE LAKE.

7. THERE IS AN AREA WEST OF THE DELTA CREEK AND NORTH OF KOOLE LAKE THAT IS FORMED BY SPRINGS WHICH CREATE A SMALL LAKE THAT THEN FLOWS AS A SMALL CREEK INTO THE TANANA. THIS HAS BECOME A SUMMER FEEDING AREA FOR GRAYLING. IT APPEARS THAT DONNELLY 2 WOULD RUN THRU THIS AREA OF WET LAND.

8. IF THE RAILROAD IS TO BE BUILT IT SHOULD BE LOCATED SOUTH OF RAINBOW LAKE. ONE OF IT'S ADVERTISED PURPOSES IS TO SERVE THE MILITARY TRAINING AREA. BUILD IT SOUTH OF KOOLE LAKE THEN PARALLEL TO THE NORTH BOUNDARY OF THE TRAINING AREA TO A POINT DUE SOUTH OF BIG DELTA THEN NORTH TO BIG DELTA. THIS WOULD AVOID A LOT OF ENVIRONMENTALLY FRAGILE AREAS. THE IDEA OF AN ACCESS ROAD PARALLEL TO THE RAIL LINE IS NOT ENVIRONMENTALLY FRIENDLY TO THIS AREA LET ALONE THE COST TO BUILD AND MAINTAIN A ROAD. THE WASH OF ROAD SOILS INTO THE WETLANDS WOULD DESTROY MUCH OF THE AREA.

9. THANK YOU

10. CC: Donald Perrin
Large Projects Coordinator
Office of Project Management & Permitting
ADNR50 W. 7th Avenue, Suite 1160
Anchorage, AK 99501-1000

Chris Mills
Regional Manager
ADNR Div of Mining, Land & Water
3700 Airport Way
Fairbanks, AK 99709

202559000	Surface Transportation B	01:45:42 p.m.	02-12-2009	6/9
Comment Number: 58				

EL-16380
Rec'd 2/10/09

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Draft Environmental Impact Statement for the
ALASKA RAILROAD CORPORATION'S
PROPOSED NORTHERN RAIL EXTENSION



COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (<http://www.stb.dot.gov>) by clicking on "E-Filing" and selecting "Environmental Comments."

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

The deadline for receiving comments is: February 2, 2009.

Full Name:	SIMMIE W. Hill
Address:	302 SLOUGH ST. Apt. #2
City, State, Zip:	FAIRBANKS, AK 99701
Phone:	451-1971 388-7787
Email:	

What comments do you have about the Draft Environmental Impact Statement?

I have Fished & Hunted the Richardson Clearwater since 1968 & own Property there. I feel that the proposed Rail Road Route has a very good chance to destroy the life-style we want to keep for our children & grand-children. THERE ARE TOO many unknown Factors such as permafrost that under ground water source, unstable ground along the Caribou River,

202565000 Surface Transportation B Comment Number: 58 (continued)	01:45:57 p.m. 02-12-2009 7/9	01:46:05 p.m. 02-12-2009 8/9	Alaska Trappers Association PO Box 82177 Fairbanks, AK 99708 Mr. David Navecky STB Finance Document No. 34658 Surface Transportation Board 395 "E" Street NW Washington, DC 20423-0001 Mr. Navecky: We wish to comment on the proposed extension of the Alaska Railroad from North Pole to Delta Junction. We've been informed that if the ARR proposal is approved, they will own title to the corridor where the tracks are placed. As owner, they will be allowed to prohibit travel across the corridor. Many trappers live along the Richardson Highway on the north side of the Tanana River, and trap on the Tanana Flats which lie south of the River (and south of the proposed corridor). Travel restrictions which may be implemented by ARR could dramatically interfere with established trapping activities. Establishment of a small number of approved crossing locations would not be acceptable. Trappers need easy access to the Flats without driving an unreasonable distance for that purpose. We've also been informed that the proposed railbed could be elevated a substantial height above existing terrain. Sides of the railbed would be steep. This situation would present a danger to any snow-machines which attempt to cross the proposed elevated railbed.
202565000 Surface Transportation B Comment Number: 59	01:46:05 p.m. 02-12-2009 7/9	01:46:05 p.m. 02-12-2009 8/9	Alaska Trappers Association PO Box 82177 Fairbanks, AK 99708 Mr. David Navecky STB Finance Document No. 34658 Surface Transportation Board 395 "E" Street NW Washington, DC 20423-0001 Mr. Navecky: We wish to comment on the proposed extension of the Alaska Railroad from North Pole to Delta Junction. We've been informed that if the ARR proposal is approved, they will own title to the corridor where the tracks are placed. As owner, they will be allowed to prohibit travel across the corridor. Many trappers live along the Richardson Highway on the north side of the Tanana River, and trap on the Tanana Flats which lie south of the River (and south of the proposed corridor). Travel restrictions which may be implemented by ARR could dramatically interfere with established trapping activities. Establishment of a small number of approved crossing locations would not be acceptable. Trappers need easy access to the Flats without driving an unreasonable distance for that purpose. We've also been informed that the proposed railbed could be elevated a substantial height above existing terrain. Sides of the railbed would be steep. This situation would present a danger to any snow-machines which attempt to cross the proposed elevated railbed.

202559560

Surface Transportation 8

01:46:18 p.m. 02-12-2009

9/9

Comment Number: 59 (continued)

We recommend that the railbed be constructed in such a manner to allow safe crossing by snow-machines.

We also question the statement on page S-16 of the Draft EIS that the lynx is a "BLM-listed ... Special Status Species." It took hours to track down the origin and meaning of this phrase. Nobody with the local BLM office or the Alaska Dept of Fish & Game was able to explain it. As close as we can determine this "Special Status" designation was assigned by some group from the Lower 48 and adopted by some new organization affiliated with the university in Anchorage.

3

This designation has no basis in fact. The lynx is an common furbearer in Alaska. Populations increase and decrease in a predictable manner (based on the availability of their primary prey) as they have since time immemorial and will continue to do so into the indefinite future. They deserve no special designation from BLM or any other governmental agency. By including this phrase in your EIS, you given credence to this unjustified status. We hereby request that the section pertaining to lynx as a "Special Status Species" be deleted from the EIS.

Sincerely,



Randall L. Zarneke, president

Comment Number: 60



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

February 2, 2009

Reply To
Attn Of: ETPA-088

Ref: 05-063-STB

Mr. David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Dear Mr. Navecky:

The U.S. Environmental Protection Agency (EPA) Region 10, has reviewed the draft Environmental Impact Statement (EIS) for the proposed project to **Construct and Operate a Rail Line Between North Pole, Alaska and Delta Junction, Alaska** (CEQ No. 080524) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we also evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS was prepared to provide the Surface Transportation Board (STB) with information to evaluate a proposal from the Alaska Railroad Corporation (ARRC) to construct and operate approximately 80 miles of new rail line, and associated support infrastructure, in the area south of North Pole, Alaska. The draft EIS divided the proposed project into various common, connector, and alternative segments and contains alternatives that reflect each of these identified segments. The proposed action represent the ARRC's preferred routes. The STB has not identified any preferred alternatives in the draft EIS.

EPA commends the STB for its approach in establishing segments and associated alternatives for evaluation; a thorough discussion of mitigation measures; tribal involvement and consultation efforts; the inclusion of greenhouse gas emissions analysis; and finally, the sponsorship of a public transportation project. Based on our review, we have rated the proposed action EC-2 (Environmental Concerns, Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we used in conducting our review of the draft EIS is enclosed for your reference.

EPA has concerns regarding impacts to water quality, open water habitats, wetlands, stream channels, and riparian areas. We are also concerned about ecological connectivity from rail line and road construction and operation, as well as river crossings as proposed. We believe that there is insufficient information regarding the purpose and need for the project, as well as impacts related to potential material sites and construction camps and staging areas. The draft

1

Comment Number: 60 (continued) 2 1 EIS also does not reflect the recent EPA decision to designate a portion of the Fairbanks North Star Borough as non-attainment for PM_{2.5} or the delegation of the National Pollution Discharge Elimination System (NPDES) program to the State of Alaska. Finally, EPA questions the need for a maintenance road to run the length of the line given that ARRC rail line is operated and maintained without such a road in other areas. We encourage STB to continue to refine segment alternatives for the final EIS in order to minimize these impacts in final preferred route development. EPA appreciates the opportunity to provide comments on the STB Northern Rail Extension draft EIS. If you have any questions regarding our comments, please contact me at (206) 553-1601. Please also feel free to contact Jennifer Curtis of my staff in the Alaska Operations Office in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov. Sincerely, /s/ Christine B. Reichgott, Manager NEPA Review Unit Enclosures	Comment Number: 60 (continued) 3 ENCLOSURE I USEPA DETAILED COMMENTS ON THE SURFACE TRANSPORTATION BOARD NORTHERN RAIL EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT Purpose and Need In our January 13, 2006, scoping comments, EPA advised the STB that the EIS should include a clear and concise statement of the underlying purpose and need for the proposed action, and clearly reflect the construction and operation of the extension to support all known public, private, and government interests. We also recommended an overall cost-benefit analysis for the project be completed. The draft EIS does include such a statement, but does not provide any data to support the project utility and need identified, such as estimated number of passenger and freight trips per day, or discussion of the interest of the US Army and US Air Force, or private industry (tourism, agriculture, mining and petrochemical) to utilize the proposed service. It also does not include a discussion of the economic benefit or comparability with the current highway travel. <i>If data regarding the interest of residents, the military, or private industry to utilize the proposed service exists, or an economic analysis of comparable passenger and freight costs is available, EPA recommends that this information be included in the final EIS in order to support the purpose and need. In addition, if information concerning closure or inaccessibility of the Richardson Highway is available, this should be included to support the explanation of a needed road travel alternative. If this information is currently not available, EPA recommends that surveys or other data collection efforts be conducted to obtain this information, and the results included in the final EIS.</i> Agency Preferred Alternative(s) EPA recognizes that the STB did not identify a preferred alternative for each of the project segments, and that this is standard practice for many agencies or projects. As such, EPA reviewed and evaluated each of the proposed alternatives for each segment, focusing on ARRC's preferred segments, which were identified in the draft EIS as the Proposed Action. Overall, EPA believes that the ARRC preferred routes represent the alternatives which cause the least impact to a variety of environmental resources, and supports the selection of these alternatives by STB as its preferred alternative(s). There are, however, adjustments that can be made within each ARRC preferred alternative to provide better protection or further minimize impacts to various resources, particularly impacts to water quality, open water habitats, wetlands, stream channels, and riparian areas. One such adjustment is the consideration of full span bridges for stream, river and wetland crossings. Another is reducing the footprint of the road, or eliminating road segments as possible, as well as construction camps and staging areas. <i>EPA recommends that any preferred alternative identified by the STB in the final EIS be further refined to further reduce project impacts, particularly to water quality, surface waterbodies and wetlands. This refinement will also help to ensure compliance with Clean Water Act (CWA) 404(b)(1) guidelines. When preferred alternatives are</i>
--	--

Comment Number: 60 (continued)	5	low impacts. Past ARRC fuel spills have demonstrated, however, that when a major spill does occur, such as the December 1999, Gold Creek spill, response is often slowed or complicated by remoteness of the site, as well as limitations in spill response resource availability, and the resulting impacts can be substantial. Given that ARRC trains contain up to 125 cars, and fuel tanker cars contain up to 23,000 gallons of fuel per car, a worst case scenario derailment or collision could result in hundreds of thousands of gallons of product being released into the environment, which could immediately contaminate a major surface water body. <i>EPA requests that STB reconsider the assumption that a hazardous material spill will result in low impacts given that low frequency and probability does not affect magnitude of the impact should such a spill occur.</i> Potential Impacts to Chena Slough The Chena Slough is a Category 5 CWA Section 303(d) waterbody (AK Id. No. 40506-002) listed for non-attainment of the petroleum hydrocarbons, oil and grease sediment standards for petroleum products and sediment in 1994. Project components of the North Common Segment appear to be within the Chena Slough watershed. ADEC records indicate nonpoint source problems result from surface water run-off, road construction, site clearing, and de-watering activities from gravel operations. According to the Alaska's Final 2008 Integrated Water Quality Monitoring and Assessment Report published by ADEC on April 1, 2008, the State is currently reviewing water quality assessment data collected in 2003 and 2007 to determine if a Total Maximum Daily Load Limit (TMDL) is needed on this waterbody. This information is currently not included in the draft EIS. <i>EPA recommends that STB include information concerning the 303(d) listing of the Chena Slough if the project has the potential to contribute to the pollutant loading of the slough. EPA also recommends that STB and ARRC work closely with ADEC if a TMDL is developed in order to meet the pollutant limits during construction and operation.</i>
Comment Number: 60 (continued)	4	<i>identified. EPA encourages the designation and complete description of material sites, construction camps, and staging areas, and a thorough analysis of the anticipated impacts associated with each of these locations.</i> Satcha Alternative Segment 1 Option 1 In general, EPA supports the selection of Option 1 for the Satcha Alternative Segment 1 due to what appears to be the need for the placement of less fill than Option 2. The angle or approach of the proposed levee, however, does not appear to be consistent with the upstream hydrology of the Tanana River, and appears to be designed in such a manner that will require continual maintenance and dredging. <i>EPA recommends that the STB further explain the design of the levee or, if not practical, reconsider the design of the levee to ensure that it aligns with the hydrological dynamics of the Tanana River in order to avoid or reduce regular maintenance and repair.</i> Road Construction The draft EIS indicates that ARRC is interested in constructing a road paralleling the entire length of the rail line extension, said to be constructed before and for the purpose of aiding in the construction and maintenance of the rail line (page 2-22). The document does not, however, explain that other sections of rail line throughout the state do not require such a road, and that maintenance can be performed from the rail line itself via hi-rail equipment. <i>If this project area is unique and necessitates the construction of a maintenance road, EPA recommends that this should be fully explained in the final EIS. Additionally, if the road is intended to serve other purposes (e.g. military training activities), this should also be disclosed fully in the final EIS.</i>
Comment Number: 60 (continued)	4	Air Quality A small portion of the Fairbanks North Star Borough, including the City of Fairbanks and the City of North Pole, has recently been designated as a PM_{2.5} non-attainment area. The designation is based on the 2005-2007 data from the Fairbanks PM_{2.5} monitor. Based on EPA's analysis, local heating emissions from woodstoves, distillate oil, industrial sources and mobile emissions contribute to primary and secondarily formed PM_{2.5} that violate the standard during stable weather events associated with extremely strong temperature inversions. Currently the draft EIS does not contain discussion regarding this designation or its potential impact on the project. <i>EPA recommends that STB work with EPA and the Alaska Department of Environmental Conservation (ADEC) to determine what effect this recent designation may have on this project, and to revise the air quality analysis in the final EIS as needed.</i>
Comment Number: 60 (continued)	7	Spill Response The STB has determined that the potential for hazardous material spills from leaks, derailment or collisions is low, and the occurrence is infrequent, and thus will have
Comment Number: 60 (continued)	9	NPDES Program Delegation On October 31, 2008, EPA approved the State of Alaska's National Pollutant Discharge Elimination System (NPDES) Program application. The State's program is called the Alaska Pollutant Discharge Elimination System (APDES) Program. Authority over the federal permitting and compliance and enforcement programs is being transferred to ADEC over three years, beginning at program approval. EPA will retain oversight of the program. Given the project schedule, EPA anticipates that all program components, including domestic wastewater and stormwater, will be delegated to the State before project construction begins. The draft EIS does not currently reflect this recent change to NPDES program administration and oversight. <i>EPA recommends that the final EIS reflect the change in permitting authority for point source and stormwater discharges where appropriate.</i>

10 Consideration of Climate Change Impacts EPA appreciates the STB's consideration of the greenhouse gas emissions and subsequent analysis of the project's potential contribution to climate change. EPA believes, however, that the draft EIS does not adequately consider the effects of climate change on the project, particularly given the anticipated rates of change to permafrost thaw as well as water quantity and availability. Given that the current estimates of permafrost temperature change is approximately 2°C, and the depth of thaw has increased in many areas in Interior Alaska, this could have significant impacts on project design, maintenance and route development. There currently exists several reports and resources through entities such as the Intergovernmental Panel on Climate Change (IPCC) and the Arctic Impact Climate Assessment initiative that discuss the range of changes that are anticipated for permafrost and water availability in interior Alaska. <i>EPA recommends that the STB consider direct, indirect and cumulative impacts to the project due to climate change, particularly impacts due to the anticipated loss of permafrost and changes in water availability, and discuss these impacts in the final EIS. EPA also recommends that potential project adaptation measures be proposed in the final EIS as needed.</i> Compensatory Mitigation for Losses of Aquatic Resources; Final Rule The "Compensatory Mitigation for Losses of Aquatic Resources; Final Rule" (commonly referred to as the Final Mitigation Rule), was published in the Federal Register on April 10, 2008 and became effective on June 9, 2008. The regulations establish performance standards and criteria for the use of permittee-responsible compensatory mitigation, mitigation banks, and in-lieu programs to improve the quality and success of compensatory mitigation projects for activities authorized by Department of the Army permits. The draft EIS currently includes a statement that compensatory mitigation for unavoidable impacts to wetlands shall be implemented as part of the U.S. Army Corps of Engineers Section 404 permit. <i>EPA notes that compensatory mitigation is not restricted to just wetlands, but to all waters of the U.S., and recommends that the final EIS acknowledge compliance with this Final Mitigation Rule.</i> 11	7 Comment Number: 60 (continued) U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Actions* Environmental Impact of the Action LO – Lack of Objections The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal. EC – Environmental Concerns EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts. EO – Environmental Objections EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts. EU – Environmentally Unsatisfactory EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ). Adequacy of the Impact Statement Category 1 – Adequate EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information. Category 2 – Insufficient Information The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS. Category 3 – Inadequate EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ. * From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.
---	---

Comment Number: 61 MAYER BROWN Ms. Victoria J. Rutson February 11, 2009 Page 2	for impacting cultural resources. It would be helpful if the FEIS could include an explanation of the connection between the identification of areas with low, moderate, and high potential for the presence of cultural resources in the predictive model and identification of low, medium, and high potential for impacting cultural resources as identified by alternative segment in Section 6.3.4 and Table S-2. 3. Page 6-6, Section 6.2.3. The heading for this section suggests there will be a discussion of previously documented cultural resources. However, this section only discusses previous surveys. This leads to a series of questions to the reader of the DEIS such as the following: Were any cultural resources identified during the surveys? If so, how many cultural resources have been previously identified in the project area? What are those cultural resources (prehistoric, historic, archaeological, buildings)? Was there any pattern to the distribution of these resources? Are any of the previously known cultural resources listed on or eligible for the National Register? Any additional information on these points would be helpful to provide further clarification to the reader of the FEIS. 4. Page 6-6, Section 6.3.1, Paragraph 1. We believe that the first sentence is incorrect per 36 C.F.R. Section 800.160(i) and suggest its deletion from or modification in the FEIS. 5. Page 6-7, Section 6.3.1, Paragraph 2 (1st full paragraph). The text indicates that a complete field survey of the overall APE was not feasible (328 feet on either side of the centerline). However, based on our limited understanding of the locations of the sites listed in Table 6-1, many cultural resource sites identified during the 2006 and 2007 surveys are well over 328 feet from the centerline, outside the APE. We believe that it would be appropriate to recognize that fact in Section 6.0. 6. Page 6-7, Section 6.3.1, Paragraph 5. The text states Type B surveys were conducted in high probability areas. The NLUR reports (2005, 2006, 2007) indicate that Type B surveys were conducted in high and moderate probability areas. The text also states testing was discretionary and based on a number of factors. We believe that it would be helpful in the FEIS to provide the reader with more detail on the factors that led to discretionary testing. It is our understanding those factors included site conditions and observations from the pedestrian walkover; in other words, cultural resource professionals selected the areas most likely to contain cultural artifacts to test. 7. Pages 6-7 to 6-8, Section 6.3.2, Paragraphs 1 and 2. The numbers for survey and sites do not appear to match the summary numbers provided in NLUR's 2007 report: 226 miles of track alignments, 241 km Type A, 122 km Type B, 195 high potential areas for testing, 63 sites, 51 prehistoric subsurface and 12 historic, 47 recommended eligible, 7 recommended not eligible, 4 require more data. 8. Page 6-8, Section 6.3.2, Paragraphs 1 and 2. Per the explanation in item 1 above, we suggest that all references to "historic properties" be changed to "cultural resources." Of the 61
Comment Number: 61 MAYER BROWN Ms. Victoria J. Rutson February 11, 2009 Page 2	February 11, 2009 Ms. Victoria J. Rutson Chief, Section of Environmental Analysis Surface Transportation Board 395 E Street, S.W. Room 1106 Washington, D.C. 20423 Re: Finance Docket No. 34658, The Alaska Railroad Corp. -- Petition For Exemption From 49 U.S.C. §10901 To Construct and Operate a Rail Line Between North Pole, Alaska and Delta Junction (Northern Rail Extension) Dear Ms. Rutson: This letter provides the Alaska Railroad Corporation's comments on the Draft Environmental Impact Statement's ("DEIS") Section 6.0 Cultural Resources and Appendix H, Draft Programmatic Agreement (PA). Comments on other portions of the DEIS will be provided separately. Section 6. Cultural Resources 1. <i>General Comment:</i> We observe that the definitions of "historic property" and "cultural resource" are inconsistently used in the DEIS, particularly comparing the use of the terms in the Glossary and Appendix H Glossary, and throughout Section 6.0. We suggest a uniform adoption of the definitions of "historic property" and "cultural resource" as was provided in the glossary to Appendix H, Programmatic Agreement (PA) with one recommended change to the definition of "cultural resource." For purposes of that definition, we suggest that the final clause regarding meeting the National Register criteria for "cultural resource" be deleted. With these definitional clarifications, we further suggest that throughout Section 6.0, "historic property" be changed to "cultural resource" unless specifically referring to a cultural resource that is listed on the National Register or that has been determined eligible for the National Register with SHPO concurrence. 2. Page 6-1. The predictive model identifies area of low, moderate and high potential having cultural resources. This seems to be interpreted as low, moderate and high potential

Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Rutson February 11, 2009 Page 4	an asterisk (*) or identified as potentially eligible. As mentioned above, we do not believe that there is a basis to address potential eligibility for any property that is not within the APE. On both tables, we suggest that the column heading "Historic Properties" be changed to "Cultural Resources." We recommend that the last column be deleted as this category appears superfluous.	Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Rutson February 11, 2009 Page 3	cultural resources documented, seven were recommended not eligible and three have not had recommendations regarding eligibility because more information is needed. In addition, in a November 21, 2008 letter, it appears that SHPO did not concur with the eligibility findings for three of the 10 sites recommended as eligible in the 2007 report. 9. Pages 6-8 to 6-10, Table 6-1. We suggest that the title of the table be changed to "Cultural Resource Site Summary Data" as it includes several cabins of recent origin that are not archaeological sites. In the last column on this table entitled "Eligibility for National Register Listing," it appears that the information in this table is from an NLUR report, and represents only NLUR's recommendations on eligibility. A more precise heading for the last column might be "Recommended Eligibility for National Register Listing." This would reflect that the STB has not yet made determinations of eligibility (and/or obtained SHPO concurrence). Further, as previously indicated in item 1, we suggest that text references in Section 6.0 to historic properties be changed to cultural resources (except for those specific properties that have received SHPO concurrence with STB's determination of eligibility). Notably, determinations of eligibility are only needed for sites within the APE, and many sites listed in Table 6-1 are over 328 feet from the centerline, well outside the APE, for which DOE's do not appear to be necessary. 10. Page 6-10, Section 6.3.3, Paragraphs 1 and 2. We observe that the discussion of possible types of impacts on cultural resources is a bit confusing and inconsistent with other sections of the DEIS. Some sentences say impacts <i>would</i> occur and others say impacts <i>could</i> occur. "Could" seems more accurate for the possible types of impacts discussed. The statements about watershed modifications and "the project would likely alter the watershed" are not consistent with Section 4.3, Groundwater and Appendix E, Water Resources. We suggest for your consideration deleting references to watershed and groundwater changes. Also, since the majority of cultural resources in the project area are lithic sites, it is unlikely these factors would have much of an impact. In Paragraph 1, we recommend deleting sentence 4 (vegetation removal and erosion) and sentence 5 (aesthetics and visual site setting) because these are potential indirect effects and this paragraph addresses direct effects. Overall, impacts other than direct impacts within 100 feet of the centerline appear to be highly speculative and are unlikely to be significant. Further, we do not agree with the language that there is a potential for impacts to aesthetics and visual site setting for buried prehistoric properties. 11. Page 6-10, Section 3.3.4, Paragraph 2 and Table 6-2. This paragraph indicates there are 16 historic sites within 328 feet of proposed project alternative segments. This appears to be inaccurate for at least some of the sites listed in the middle column of Table 6-2. For example, XBD-281 appears to be over 400 feet from the centerline of Delta 2. We recommend that the information in Table 6-2 be checked for accuracy. 12. Page 6-11, Tables 6-2 and 6-3. All sites, except for those specific properties for which SHPO has concurred with STB's determination of eligibility, we recommend be marked with
Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Rutson February 11, 2009 Page 4	13. Page 6-11, 1st partial paragraph. Per DEIS page 6-7, the APE was expanded to 328 feet on either side of the rail centerline to account for the proposed mainline track and ancillary support facilities and the potential indirect impacts that could result from construction and operation of the rail line. Page 6-11 states that (potentially) historic properties up to 1,312 feet (400 m) from the APE would not likely be affected by the ROW, but could be affected by the final design of ancillary features and their access roads. We suggest that the "buffer area" is generally excessive and unjustified. While it may be appropriate in some very limited areas where certain ancillary facilities are sited (e.g., material sites, tower sites or access roads) some distance from the centerline, it is not the case along the entire corridor. Also, we note that neither the ROW nor final design will impact historic properties -- any potential impact would be a result of construction and operation of the rail line within the ROW.	Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Rutson February 11, 2009 Page 3	14. Page 6-11, Tables 6-2 and 6-3. Why is FAL-1750 included on Table 6-3? It is a cabin of recent origin, and is not an historic property. Also, Tables 6-2 and 6-3 include many sites/site numbers that are not listed on Table 6-1, and no information is provided about these sites in the DEIS: XBD-027, XBD-091, XBD-128, XBD-129, XBD-188, XBD-189; FAL-071, FAL-156. We recommend adding a table of known cultural resource sites to Section 6. 15. Page 6-12, Section 6.3.4, Paragraph 4 (1st paragraph on page). We don't agree with the statement that all buried prehistoric sites are eligible for the National Register, and per SHPO, not all buried prehistoric sites have been found eligible for the National Register. We suggest that it would be more appropriate to state that they are potentially eligible, except for those specific properties for which SHPO has concurred with STB's determination of eligibility. We recommend changing the 3rd sentence to "Buried prehistoric sites are potentially eligible for listing on the NRHP . . .". Also, the statement that these sites consisted of buried cultural materials including features, artifacts, and faunal remains may be misleading to readers of the DEIS. Some sites included only artifacts (chert flakes) with no features or faunal remains. 16. Pages 6-12 to 6-15, Section 6.3.4. We suggest that definitions for low, moderate, and high sensitivity/potential could be provided for clarity. Also, for clarity, if there is no direct effect, and there have been no cultural resources identified in the APE (nor are there likely to be any), why would the indirect effect be minimal instead of "none"?

Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Ruisson February 11, 2009 Page 5	17. Page 6-13, Section 6.3.4, Connectors. The reference to the trapper's cabin (site #?) is confusing to the reader of the DEIS. Table 6-1 does not identify a trapper's cabin along Connector B. 18. Page 6-13, Section 6.3.4, 3rd full paragraph. With regard to Donnelly Alternative 1, the DEIS addresses sites between 328 and 1,640 feet of the APE, yet Donnelly 2 addresses sites within 1,312 feet of the APE. It is unclear why the basis for comparison of the alignment alternatives is not the same. 19. Page 6-13, Donnelly Alternative Segments. We submit that there is insufficient information presented in the text to form the basis for a conclusion about impacts to historic resources along the Donnelly segments. For example, the mere presence of a site within the APE (328 feet on either side of the rail centerline) does not mean there will be an adverse effect. As previously indicated, direct effects may occur within the 200-foot ROW, and indirect impacts may occur out to 328 feet. To our knowledge, there have been no determinations of effect submitted to SHPO for concurrence. Also, please note that based on the information we have seen, XBD-298 would not be affected by the Donnelly 1 alignment, and this is likely the case with some of the other sites identified as within the APE. 20. Page 6-14, Delta Alternative Segments. Please explain the basis for the conclusion that the Delta alternative segments have moderate potential to affect historic properties, since no cultural resources were found along Delta 1 and only one site was found near the APE along Delta 2. The Delta 1 site appears to be 130m from the main track centerline and 343m from microwave tower 5. Based on the information we have been provided, Delta 1 appears to be in an area of low to moderate potential for prehistoric and historic sites (not moderate as stated in the text). The text indicates the segment is situated in abandoned and active floodplain alluvium. As such, the potential for impact appears to be minimal, except in the unlikely event the site cannot be avoided in siting an access road to the tower. <i>Appendix H, Draft Programmatic Agreement</i> 21. Page H-2, Preamble, 6th Whereas clause. Based on the documents we have reviewed, the STB appears to have made only a few determinations of eligibility and received SHPO concurrence with those determinations. As previously indicated, ARRC does not believe formal determinations of eligibility for all cultural resources identified are necessary at this time. Such determinations will only be needed for cultural resources within the APE associated with the selected alignment. 22. Page H-4, Section II.A. It is not clear to the reader what is meant by the term "components"? Perhaps this paragraph could be clarified, as we do not believe the PA is intended to apply to operations, once construction is complete.	Mayer Brown LLP Comment Number: 61 (continued) Ms. Victoria J. Ruisson February 11, 2009 Page 6 23. Page H-4, Sections II.B and C. What is a "consensus agreement"? It does not appear that STB's letters of 8/22/07 and 1/16/08 to SHPO provided STB's determinations of eligibility, nor does it appear that the 9/24/07 or the 7/16/08 letters from SHPO concur with any STB determinations of eligibility. We recommend that Paragraph II.B be reworded, as it appears to reflect NLUR's preliminary determinations of eligibility or recommendations regarding eligibility, and not STB determinations that have received SHPO concurrence. 24. Page H-5, Section IV.A. In addition to identifying areas that may require additional investigation, it would be useful to identify areas that do not require further investigation. These areas may include existing access roads/trails, provided disturbance remains within the previously disturbed area. As recommended by NLUR (see Potter 2007, pages 113 and 246), this section should also exclude from further investigation areas where the alignment shifts less than 100 meters from the APE surveyed in 2006 and 2007. 25. Page H-5, Section IV.A.1. We agree that the APE should be the 200-foot ROW, plus ancillary facilities that may extend outside the ROW. However, this does not appear to be consistent with the DEIS, which indicates the APE is 328 feet on either side of the centerline. 26. Page H-5, Section IV.A.3. We are unable to evaluate this stipulation without more information on the specific sites that require additional information to establish boundaries or determine the effects of the Undertaking. 27. Page H-6, Section V.A. Refer to "historic properties" rather than "cultural resources". Also, add "to the extent practicable" to the sentence. ARRC must also consider impacts to other resources and engineering constraints in the determining the final alignment. 28. Page H-6, Section V.B. We recommend that this section apply only to properties determined by the STB to be eligible for the National Register, that would be adversely affected, and that have received SHPO concurrence with both the eligibility determination and the finding of effect. 29. Page H-6, Section V.C. We are pleased to see that this section includes alternatives to the standard mitigation approach for archaeological sites (data recovery). In addition to the alternatives mentioned, other mitigation approaches might also be recognized, including avoiding, minimizing, rectifying, preserving in place, and compensation. Finally, this section should recognize that destruction without data recovery may be the appropriate treatment at some archaeological sites, which is specifically acknowledged in the ACHP's Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites (http://www.achp.gov/archguide.html). 30. Pages H-11 to H-12. A statement could be added to the stipulations regarding disputes about eligibility determinations. For example, "Disputes concerning eligibility will be resolved by the Keeper of the National Register (Keeper) pursuant to 36 CFR Part 63 and 36 CFR Part
---	---	--

Mayer Brown LLP

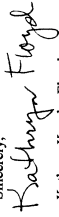
Comment Number: 61 (continued)

Ms. Victoria J. Ruison
February 11, 2009
Page 7

30 | 800.4(c)(2).” Also, we believe the PA could also address disputes regarding additional identification and evaluation efforts, and findings of effect.

31 | In addition to the comments above, we are attaching hereto proposed errata to the DEIS for your consideration. Thank you for providing us with the opportunity to review and comment on the DEIS. Please let us know if you have any questions.

Sincerely,



Kathryn Kusske Floyd

Attachment

cc: Dave Navecky
Alan Summerville
Brian Lindamood

Comment Number: 61 (continued)

PROPOSED ERRATA	
Reference	Comment
#35 DEIS Glossary, Definition of NHPA	Add a clause at the end, as follows: "... and give the Advisory Council on Historic Preservation a reasonable opportunity to comment with regard to the undertaking".
#36 Page 6-1, Section 6.2	Define prehistoric and historic.
#37 Page 6-6, Section 6.2.3	4th line. "has" should be "have".
#38 Page 6-7, Section 6.3.1, Paragraph 2 (1 st full paragraph)	Consider revising the first paragraph as follows for clarification. "In general, the purpose of a cultural resource survey is to identify NRHP eligible cultural resources, or historic properties, that could potentially be affected by construction and operation of the proposed project. For the purposes of the NRE cultural resources survey, the Area of Potential Effect (APE) for direct effects was considered to be 100 feet on either side of the track centerline. ... To accommodate the proposed mainline track, any proposed ancillary support facilities, and an area of indirect effects, the APE was expanded to 328 feet (100 meters) on either side of the rail centerline. The survey was conducted as a systematic sampling survey..."
Page 6-7, Section 6.3.1., Paragraph 4	The first sentence should be clarified to indicate that the predictive model is for prehistoric sites.
Page 6-8, Section 6.3.2., Paragraph 2	Under which criterion are the Salchaket Village sites likely eligible?
Page 6-8, Section 6.3.2., Paragraph 2	For clarification, consider changing the 3 rd sentence as follows and deleting the 4 th sentence. "A total of 51 cultural resource sites were recommended eligible under NRHP Significance Criterion D because of their potential to yield information regarding prehistoric technology, subsistence, and/or settlement patterns important to the cultural history of Interior Alaska."
Pages 6-8 to 6-10, Table 6-1	In note (a) for Site (column 1), are these Alaska Heritage Resources Survey (AHRs) numbers? If so, that could be stated.
Page 6-8 to 6-10, Table 6-1	Change eligibility on XBD 336, XBD 340, and XBD 342 to "Not Eligible"
Page 6-10, Section 3.3.4, Paragraph 1	This paragraph states "The limits of disturbance for the mainline track extend 100 feet on either side of the track centerline. These areas

Comment Number: 61 (continued)		Comment Number: 61 (continued)	
32	subject to direct impacts. The overall project APE is considered 328 feet (100 meters) from the centerline. These areas, outside the limits of direct disturbance, are subject to indirect impacts from the build alternatives." The last sentence would be more clear if revised as follows: "The areas outside the 200 foot ROW to 328 feet from the centerline may be subject to indirect impacts." This paragraph states there are two historic Salchaket Village sites, but previous discussion states there are three (see page 6-8, XBD 295 is missing). Also, consider using consistent terminology for throughout document—either "National Register" or "NRHP". Further explanation of the numerous archaeological resources encountered would be useful. Are they all within the 328 foot APE?	A.1. PageH:23, Appendix A.1 cultural items found on Federal lands. Perhaps a reference to State regulations might be included. We recommend specifically identifying the appropriate qualification standards—Secretary of Interior's Professional Qualification Standards (48 FR 44734 44737).	
33	Page 6-13, Section 6.3.4., Salcha Alternative Segments, Paragraph 2 Page 6-13, Section 6.3.4., Donnelly Alternative Segments, Paragraph 1 Please explain the relevance of the Donnelly-Washburn Trail. Is it a cultural resource that could be eligible for the NRHP, and if so, what effect would the alternative have on the trail?		
34	Page 6-13, Section 6.3.4., Donnelly Alternative Segments, Paragraph 2 If the prehistoric sites will not be listed, consider referring the reader to the appropriate table. Page H-2, Preamble, 2nd Whereas clause. We recommend clarifying this clause to indicate whether the Invited Signatories and Concurring Parties do or do not have the right to amend or terminate the PA. Page H-2 Preamble, 5th Whereas clause The numbers in the PA do not match the numbers in the DEIS section regarding acres and number of sites identified. Page H-4, Section II.B. The numbers of sites do not match numbers in DEIS. Further, we recommend deleting the percentages and including a reference to SHPO's letter dated 11/21/08 and consider including the correspondence between STB and SHPO be included in an appendix? Page H-4, Section II.C. What are "determinations of APE"? Should this be "determinations of eligibility" or "delineation of APE"? Change "scared" to "sacred" in last sentence. Page H-6, Section V.B.2. The section should be clarified to acknowledge that the significance of the Salchaket Village sites have yet to be determined (per NLUR and SHPO). Page H-7, Sections VI and VII.D, and page 10, Section X.B. Human remains policy is Appendix A.1. Page H-21, Appendix NAGPRA only applies to Native American human remains and		

Comment Number: 62

**FAIRBANKS
METROPOLITAN
AREA
TRANSPORTATION
SYSTEM**

POLICY COMMITTEE MEMBERS

Steve Trus, P.E.
Dept. of Transportation & Public Facilities
Regional Director, Northern Region
2301Pager Road
Fairbanks, Alaska 99709
(907) 451-2210

Mayor Jim Whisker
Fairbanks North Star Borough
Fairbanks, Alaska 99701
(907) 459-1300

Mayor Terry Sels
800 Cushman Street
Fairbanks, Alaska 99701
(907) 459-6795

Mayor David Jackson
City of North Pole
125 Stearns Lane
North Pole, Alaska 99705
(907) 488-2281

Luke Hopkins
Fairbanks North Star Borough
Borough of Mayors Representative
P.O. Box 12507
Fairbanks, Alaska 99707
(907) 455-6805

Clare Roberts
City of Fairbanks
Fairbanks City Council Representative
P.O. Box 71819
Fairbanks, Alaska 99707
(907) 452-2435

Alice Edwards
Dept. of Environmental Conservation
Alaska Department of Natural Resources
410 Wiloughby Ave., Suite 303
Juneau, Alaska 99801-1800
(907) 965-5109

January 21, 2009

RE: Northern Rail Extension Draft EIS

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Dear Mr. Navecky:

The Fairbanks Metropolitan Area Transportation System (FMATS) Policy Committee appreciates the opportunity to comment on the Northern Rail Extension Draft EIS in an effort to encourage development of a coordinated, intermodal transportation system in the Metropolitan Planning Organization (MPO).

First, the FMATS Policy Committee supports the development of the Northern Rail Extension and views it as a critical economic development project as well as a nationally significant transportation project.

Secondly, although the Northern Rail Extension falls outside FMATS' MPO boundaries, it is contiguous to its boundaries, and therefore has some impact within the intermodal transportation system. Chapter 11 of the Draft EIS on *Transportation Safety and Delay* and the related data presented in Table K-4, support our conclusion that an increase in rail traffic (10 round-trips daily), as a result of the proposed action, would result in an increase of 35% in the number of cars affected by a 20% longer delay. At-grade crossings of primary FMATS concern are those that experience the highest average annual daily traffic, such as University Avenue (data not shown in Table K-4), College Road, Old Steese and New Steese Highways. Coordination of the rail schedule at periods that experience lower highway traffic volumes, when possible, will minimize potential delays and accidents.

The FMATS Policy Committee strongly urges the funding and the development of the Northern Rail Extension as well as the immediate funding to pursue the Fairbanks-North Pole Rail Realignment to eliminate the over 50 at-grade railroad crossings.

Please direct all future correspondence regarding this project to our Coordinator at the address below.

Sincerely,

Steve Trus
Steve Trus, P.E.
Chair, FMATS Policy Committee
800 Cushman Street
Fairbanks, AK 99701

Comment Number: 63

Dave Claxton
484 Ruth Estates Road
Fairbanks, Alaska 99712
907-459-4147

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

HELLO

My name is David Claxton and I thank you for this opportunity to respond to this forum. I am concerned about the route of the Northern Rail Extension because I have a cabin on the Richardson Clearwater.

1. The first question I have is, why can't this right of way be moved over to the military property or as close to it as possible? This would minimize the noise and vibration that will disturb the wildlife and fisheries on the remote beautiful river, and would move it farther from the wetlands, also the fact that we are there every weekend of the summer [May to October] using this creek for our recreation, and I personally don't want to hear a train going by when I'm trying to sleep or enjoy the solitude of this remote quiet river we call home for most of the summer. Our home in Fairbanks is about 5 miles on the back side of Birch Hill from the railroad that runs through town, and we can hear it from there. Your route has the NRE anywhere from 1/4 to 2 miles from the Clearwater. Also we have approximately 6 families who live there 24 hours a day from May to September and they have made remarks of having to listen to the railroad. Please move it far enough away so we don't have to listen to it.

2. I would also like to know what the railroad is prepared to do to keep the moose population that is going to be traveling this "new trail" from getting hit, on the railroad, like the problem you have down by Anchorage? I would like to see a trail in the 200-foot easement that is kept open for the moose to walk down to keep them off of the tracks.

3. One of my major concerns is the road that is going to be built alongside of the railroad. How much access is the public going to have and are you going to allow hunting on or use this for access to 20A management area? How about whistle stops along the railroad, as this could be a problem to this moose population, if easy access is allowed. Also the military doesn't need a road to move their equipment because they have the railroad to move it for them, and this is what I thought was the reason for the railroad being built in the first place.

4. I also would like to touch base on the fact that you are crossing two tributaries of the Richardson Clearwater. These are main incoming feeder streams for the level and clarity for this river plus these are spawning salmon and grayling beds up both of these streams. I also worry about toxic spills this close to streams and wetlands. This damage would be irreplaceable to the environment not to say the wildlife, fisheries, birds, ecology, landscape and watershed for this river. I defer to Alaska Fish and Wildlife on the damage that could be caused by a spill to any of

Comment Number: 63 (continued)

the regions along the corridor you are proposing now. If you moved the railroad to the farthest route next to the military border then straight across to the Donnelley turning point you would miss most if not all of the creeks and wet lands.

Thank you,

David Claxton 1-30-09

David Claxton

Cc:

Donald Perrin
Large Project Coordinator
Office of Project Management and Permitting
ADNR50 W. 7th Avenue, Suite 1160
Anchorage, AK 99501-1000
907-269-7476

Chris Mills
Regional Manager
ADNR Div of Mining, Land & Water
3700 Airport Way
Fairbanks, AK 99709

Comment Number: 64



ALASKA FARM BUREAU, INC.

Bryce Wrigley, President
bwrigley@wildak.net

Jane Hamilton, Executive Director
janehamilton99737@yahoo.com

January 27, 2009

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E. Street S.W.
Washington, D.C. 20423-0001

Dear Mr. Navecky,

The Alaska Railroad Corporation is proposing a Northern Region Expansion to the Ft. Greely/Delta Junction area in Alaska. We support the railroad's efforts to provide additional transportation to the state. Expansion to Delta Junction area will have a positive impact on the farm community located in and around Delta Junction. There are several routes this expansion may take.

Eielson Alternative Segment 3 would not impact any farms or farmers currently on Eielson Ag Road. This is the only alternative route that does not negatively impact agriculture.

The Alaska Farm Bureau's 2009 Resolution Platform, approved by the voting delegates at our Annual Meeting on November 14, 2008 addresses this: "The Alaska Farm Bureau opposes any action by the Alaska Railroad that would impede agriculture in the Eielson Agricultural Project."

Although Alaska is fortunate to have so much acreage that makes up our state, there are very few farms or farmland statewide. We oppose any route that would dissect, disrupt or negatively impact the farms currently located on Eielson Ag Road.

Therefore, we can only support Eielson Alternative Segment 3. We urge the Transportation Board to consider the positive impacts of a railroad expansion via Eielson Alternative Segment 3.

Respectfully submitted,

Bryce Wrigley
Bryce Wrigley,
President

PO Box 760 Delta Junction, Alaska 99737 Telephone: (907) 895-4752

EI-16396
Redd 2/19/09

Comment Number: 65 Rick J. SCHIKORA CERTIFIED PUBLIC ACCOUNTANT January 30, 2009 14116 GILLAM WAY FAIRBANKS, ALASKA 99701 David Novecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street SW Washington, DC 20423-0001 Dear Mr. Novecky: Let me thank you for this opportunity to provide some input on the Northern Rail Extension considered in Docket 34658. I have not studied the EIS in detail and will limit my comments mostly to the segments of the project near the Richardson Clearwater, namely Donnelly 1, Donnelly 2 and the South Common Segment. I have been recreating in the area south of the Tanana River, especially in the Richardson Clearwater area, since I was 15 - over 42 years now. I have been active in the pro-development and business organizations like the Greater Fairbanks Chamber of Commerce most of my adult life. I have been active in organizations that have opposed the federal subsistence mandate placed on the State of Alaska through ANILCA in 1980 and have promoted continued and better access to Alaska's public lands. I have been a member of the Air Force Association for a number of years now and support the military in their efforts and ability to use our lands and airspace for training. I have been on the Golden Valley Electric Association Board of Directors for 23 years now and, though I do not speak for GVEA on this issue, I have some experience with the placement of power lines in the Tanana Flats. It is from these perspectives that I wish to offer comments. I am not a NIMBY, but if one is going to have something in his backyard, the placement ought to be such that it best lessens the impacts of its presence. With regards to the South Common Segment, I believe that you should move the NRE as far south as you can, likely right outside the northern boundary for the Restricted Area 2202A, shown on the Anchorage Sectional Aeronautical Charts. A major user of the facility will likely be the military and the facility should be close to their facilities to avoid additional hauling of equipment. An alignment along the northern boundary of Restricted Area 2202A would also decrease the amount of area put off limits to access by the NO Trespassing policy of the ARR. This alignment will also reduce the impacts on the Richardson Clearwater watershed related to noise, vibration, water siltation, and potential damage to the aquifer during construction and operations in this area. This alignment would start back where Donnelly 1 comes out of the Donnelly Training Area and would parallel that boundary on to the southeast. This would put the South Common Segment four to six miles south of its proposed location. Let me more specific on the concerns that relate to the South Common Segment (and other segments that run west-east south of the Tanana River. If I understand it right, your document doesn't adequately address the issue of the NRE creating a barrier to access for all of the land to the south of the rail due to the ARR's policy to have all of its property marked NO Trespassing.	Comment Number: 65 (continued) Effectively, this west-east line will eliminate the ability to go south of the rail line with snow machines in the winter for purposes of trapping or hunting and may eliminate some access by ATV in the summertime, though in more concentrated areas of trails, whether marked or not. From this standpoint alone, the NRE should be moved right up against the Donnelly Training Area, an area that is restricted to aircraft over flights and restricted as far as ground access is concerned, due to the military operations in the area. If it is not moved, there will be a "dead zone" in which no activity can take place due to elimination of access by two different governmental agencies. Moving the rail line to the south along the Donnelly Training Area will significantly reduce the amount of noise generated by several trains a day running between Fairbanks and Delta Junction. Your plan estimates that there will be five trains per day and maybe four trains for passengers. One of the beauties of the Richardson Clearwater area is the lack of noise. Not in the too distant past, I had the opportunity to take the Base Realignment Commission (BRAC) advance team of four people over to the Richardson Clearwater on a Sunday morning, staying until mid-evening. One comment that all four made was that "it is so quiet here, you can't hear anything." And that is the way it was. These people were from much more populated areas, but the deathly quiet was one of the things they noticed most. Moving the rail line south a few miles will help insure that this quality stays that way. Have you done any studies of how much noise is along the South Common Route and how much noise there is along the Richardson Clearwater? A baseline would be beneficial. Your document indicates that there may be damage to salmon eggs due to vibration during the construction process and that there may be damage to the aquifer. I am significantly concerned about damage to the aquifer for a variety of reasons. Your document doesn't adequately acknowledge the importance of the Richardson Clearwater (and the Five Mile Clear Creek, or other Clearwater streams along the NRE) as salmon spawning grounds and important habitat for grayling and other fish species. As to the salmon, I am most concerned that their habitat not be damaged because the salmon are used as a subsistence food for the down-river users. We need to take great efforts to protect this habitat from damage. The amount of effort needed to move the rail line south a few miles is minimal. Wouldn't it be better to move the rail line south to where the impacts to this watershed from vibration were significantly lessened? From my flying over the area to the south, the wetlands that would be crossed by the rail line are not as valuable as the wetlands in and around the Richardson Clearwater. The same goes for the streams to the west. Your document recognizes that these areas are designated as important fish and wildlife habitat by the Tanana Basin Plan. Since your document acknowledges that there could be damage during construction and operations related to vibration, I ask if you have done any base line studies of the present level of vibration in the area? Your document also indicates that there could be damage to the aquifer related to construction activities and due to sediment flow from constructed facilities after construction. My comments about the salmon should be considered repeated here. In addition to salmon though, this area and the clear streams south of the Tanana are important grayling and other fish species rearing grounds. These clear streams provide recreation to a multitude of people. Since the Carla Lake fire in 1998, we have noted a significant decrease in the ability of the ground in the upper Richardson Clearwater area to hold rainfalls. The Clearwater never used
1	3
2	4
5	5
6	6

Comment Number: 65 (continued)

to change in its depth. Since the fire, several times when we endure heavy rains, the Clearwater has raised and the waters have become turbid. I am significantly concerned about the additional sediment run-off possibilities by the railroad and road construction in the area of South Common Segment. Of similar concern is the runoff from the Big Delta Construction Camp and Staging area and the two 17 acre borrow areas along the South Common Segment. If this area is damaged by sediment or the water is discolored, fish species and recreation will be impacted. I believe these impacts could be lessened or eliminated by moving the rail line to the south a few miles.

Of particular concern are spills of hazardous materials being carried by the ARR in the South Common Segment. If any kind of spill were to occur, it could be particularly damaging to the fish species, wildlife species and habitat of the South Common Segment. These concerns also could be lessened by moving the rail line south a few miles to be adjacent to the boundaries of the Donnelley Training area.

Your document states that construction of the South Common Segment would result in the destruction or disturbance of two red-tailed hawk nests, two great gray owl nests, and one great horned owl nests. I am not sure when you surveyed the area to determine the population of these birds, but, recently they have increased in number and have been joined by a few bald eagles. Construction of the South Common Segment a few miles to the south of your proposed route could eliminate the disturbance and certainly the destruction of these birds. I realize that moving the rail line south might disturb other birds, but you will not be disturbing these birds, which are used to the Richardson Clearwater area.

I question the need for a gravel road running along side the rail line. Why is this needed? According to the document, it will be used for maintenance of the rail line. I cannot believe that this is a necessary feature for maintenance of the rail line. I offer as proof the existing rail line between Fairbanks and Seward. There is not a road running along side the rail line for maintenance purposes. In some limited areas there is an existing State highway that does parallel the rail line, and it may be used for hauling maintenance equipment and materials at times, but its primary purpose is not for the maintenance of the rail line. In a significant portion of the rail line between Fairbanks and Seward, there is no road next to the rail line. In some areas the rail line traverses land similar to the area along the Donnelley Training Area – areas of wetlands and forests. I can think of the area in the lower end of Goldstream Valley in the Dunbar area for instance. This part of the line is not even within miles of an access road. Maintenance is done from the rail itself. I do not understand why this could not be done with the NRE.

If there is to be a road along side the rail line, I recommend that it be on the south side of the rail line and that it be open to the public. It should not be used just by the ARR or the military. Public access to the south of the rail line could be ensured and it would alleviate the issue previously raised about the NO Trespassing policy of the ARR.

I recently attended a GVEA board of directors meeting. I asked the board and management of GVEA if they had any idea that the NRE was going to include a power line from Eielson to Delta. Only one had heard anything about this proposal. What is the reason for having a power line running the length of the NRE? Is the power to be used along the rail line? If so, for what

Comment Number: 65 (continued)

facilities will it be used? I do not recall the mention of facilities – buildings, etc. along the route. The placement of poles along this route will be challenging. If they are not placed right along side the road bed in placed materials, they will most likely look like several of the poles in wetlands areas throughout the Fairbanks area. They will be leaning one way or another, sometimes substantially. They will require substantial bases be constructed, or they will require significant deep drilling for pole placement. If you would like to have an idea what these poles would look like in my opinion, please drive the Richardson Highway toward Delta beyond Birch Lake. Or, drive along Holmes Road locally to see the additional bases required on poles so that they have a much larger footprint.

I thank you for the opportunity to comment on your EIS and I look forward to your keeping me abreast of changes in the routing, construction methods and timeframes as the planning process continues. I may not have covered every area of which I have concerns in this letter and reserve the right to comment further at a later date.

I know several people who have not been able to review the EIS in the relatively short 45 day comment period provided. I request that you extend the comment period for an additional sixty days to accommodate as many commenters as possible. Getting as much public input should be one of your goals in this process. 45 days for commenting on a project of this magnitude is just not enough time, especially since there were three major holidays in the time period provided.

Though I have email, I would prefer that you send additional documents and responses to the address above through the US Mail.

Sincerely,



Rick Schikora

CC: Donald Perrin, Large Project Coordinator
Office of Project Management and Permitting
Alaska Department of Natural Resources
550 W 7th Avenue, Suite 1160
Anchorage, AK 99501-1000

Chris Milles, Fairbanks Regional Director
State of Alaska
Department of Natural Resources
Division of Land, Water and Mining
3700 University Avenue
Fairbanks, AK 99709

Comment Number: 66

Gerald Richards
342 Drex Drive
Fairbanks, AK 99701

February 2, 2009

Mr. David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Dear Mr. Navecky,

I have reviewed the proposed Northern Rail Extension project for the Alaska Railroad between Fairbanks and Delta Junction, Alaska and have numerous concerns. The preferred route has a direct negative impact on property that I own on the Five Mile Clearwater. The preferred route also has a negative impact on about 40 other property owners that use the Five Mile Clearwater for recreational purposes in the summer and fall, not to mention the hundreds of other users that frequent the creek for sport fishing and hunting in the summer and fall of the year.

1. My first concern is related to the future access to the 5 mile Clearwater. To the extent the plans for this section of the railroad and the related crossing of the Tanana River and up affecting the water levels for access to the creek, this will create a major problem. I would strongly recommend you consider moving the crossing slightly North to avoid changing the approach or entry to the 5 mile Clearwater.

2. There is an alternate route that takes the railroad South of the 5 mile Clearwater. From my personal perspective and that of all the property owners on the 5 Mile Clearwater, this alternate route would be a much preferable route as there would be less interactions and crossings of the creek and the noise level for the property owners would be reduced considerably.

3. The current preferred route looks like it goes right through the middle of my property that I own on the 5 mile Clearwater. If that is the case, I would probably end up losing my property to some form of eminent domain or something. I do not want to sell or have my property taken from me. I value my property very highly and it just simply cannot be replaced with anything comparable. I have looked for many years in the Interior and have plans to build a summer retirement home on the property that I own on the 5 mile Clearwater. The Railroads preferred route would take away a dream of mine.

Comment Number: 66 (continued)

Mr. David Navecky
Northern Rail Extension Project
Page 2

4. Access across the proposed extension of the railroad is another major concern of mine. I only see access being allowed at limited points on the proposed plan. This would cut off access to the Tanana Flats from the crossing at the Tanana River to Delta except for the few limited access points that show on the map. This is a huge recreational area that consists of hundreds of thousands of acres of land. Any plans for the Railroad Extension must take into consideration the historic use and trails that have been used by Alaskans for decades. To offer any less access would be comparable to the locking up of ANWAR by the Carter administration.

I am sorry I cannot say more positive things about the proposed extension plan. The reality is that if the Railroad is extended following the current preferred route directly adjacent to the 5 mile Clearwater, then my current and future lifestyle will be greatly diminished. Thank you for considering my comments.

Sincerely,

Gerald A. Richards
Gerald A. Richards

Comment Number: 67

STATE OF ALASKA

E1-16399

Redd 2/19/09

SARAH PALIN, GOVERNOR

2901 PEGAS ROAD
FAIRBANKS, ALASKA 99706-5399
PHONE: (907) 457-2210
TDD: (907) 457-2363
FAX: (907) 457-2333

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
NORTHERN REGION, PLANNING & SUPPORT SERVICES

February 2, 2009

David Navecky
STB Finance Docket No. 34638
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423-0001

Re: Alaska Railroad Corporation Construction and Operation
of a Rail Line Between North Pole and Delta Junction
Northern Region DOT&PF Comments January 2009

Dear Mr. Navecky,

Northern Region DOT&PF has the following comments:

1. DOT&PF prefers a right turn pocket for the access to Tom Bear Trail from the Richardson Highway.
2. DOT&PF prefers the route with the least amount of roadway crossings. Of those crossings proposed in the various alternatives, what is the plan for maintaining them if they are constructed?
3. S6.9 Transportation - "For new at-grade crossings, predicted accident frequency would be expected to be much lower than for the existing grade crossings, because total estimated vehicle traffic at the new crossings would be less than 2 percent of that for the existing crossings for any of the alternative routes from North Pole to Delta Junction."
 - i) While traffic volume is lower at new crossings due to location and community size, the local community may be less educated regarding roadway/railroad crossings. Has this been taken into account, or is traffic volume the only criteria for evaluation?
 - ii) The section mentions "... to Delta Junction." There are two potential crossings South of Delta Junction (one on the Alaska Highway, and one on the Richardson Highway), are these included in the impact analysis?
 - iii) Also, the location of all potential roadway crossings (either at-grade or elevated) have not been identified. In accordance with the Alaska Traffic Manual, Section 8A.02, an

"Providing for the safe movement of people and goods and the delivery of state services."

Comment Number: 67 (continued)

engineering study involving both the highway authority and the railroad company should be conducted to determine what actions should be taken to enhance safety at the crossings.

- iv) S6.11 Land Use - "Any non-rail associated activities within the ROW would require a permit from ARRC, and any permissions required by the agency, corporation, or individual that owns the property. Permanent support facilities that would be constructed outside of the ROW include permanent access roads, communications towers, and facilities to support rail line operations, including a passenger terminal."
- v) If a permanent access road is to be constructed outside the ROW, as indicated by this section, why is it not included in the ROW acquisition? Why would a passenger terminal be constructed outside of the ROW? On whose property will these permanent features be constructed?
- vi) Also, if the permanent access road is outside of ARRC's ROW, is it available for public use without a permit from ARRC, as suggested by the above section?

Regards,


Ethan Birkholz
Planning Manager, Northern Region

Cc: Steve Titus, P.E. Regional Director, Northern Region
Dave Bloom, P.E., Preconstruction Engineer
Gerald J. Rafson, P.E., Chief of Planning, Northern Region

"Providing for the safe movement of people and goods and the delivery of state services."

Comment Number: 68 February 1, 2009 Mr. David Navesky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street, S.W. Washington D.C., 20423-0001 Comments on the DEIS for the Application from the Alaska Railroad Corporation, STB Finance Docket No. 34658 from the Fairbanks Fish and Game Advisory Committee Dear Mr. Navesky, As I testified at the Fairbanks public hearing, the Fairbanks Fish and Game Advisory Committee (FAC) is a local part of the Boards of Fish and Game authorized by Alaska statutes and guided by the Alaska Administrative Code. The FAC is charged to coordinate with large project proponents when the project would impact the hunting, trapping and fishing activities of our constituents. The FAC represents the entire population of Fairbanks and North Pole. Our members have several general concerns about the railroad extension, mostly around the issues of access and maintaining our fishing, hunting and trapping opportunities. The area south of the Tanana River is designated by the Board of Game as Unit 20A. It is a very popular area for moose, caribou, sheep and bear hunting. For example, a recent moose population reduction registration hunt has attracted around 6,000 applicants a year for the past several years. These hunters utilize state and federal lands and the very good cooperation from the military. As suggested in the DEIS there are some heavily used trails into the southern reaches and Alaska Range foothills. One error in the DEIS is that some of these trails are not just ATV or ORV routes but were built and historically used by heavy equipment supplying the mines in the Alaska Range foothills. We would like the generalizations in the DEIS to accurately reflect the purpose and need for the project, expected limitations to access and see them oriented to having the project be a lot better "neighbor" in some areas that are not identified in the document but are heavily used and developed by Alaskans. The proximity impacts are greatly understated, as are the references to the railroad being a reasonable "alternative" to travel between the Fairbanks area and Delta Junction. We support a railroad corridor, but request the applicant do more to mitigate the likely effects of a linear transportation facility. We appreciate the need to step back from liability of "crossing the tracks" and support the development of undercrossings for the trails and drainages. The statements about "limiting access" however, should be oriented toward the existing conditions for the Seward to Eielson ARR. Highway type vehicles can utilize the "designated" and developed crossing but the DEIS should not imply that pedestrian traffic (like hunters and trappers) or those Alaskan who use small personal ATV/ORVs will be restricted to specific crossings. As they do on the ARR presently, Alaskans will take the responsibility and liability for crossing the tracks as the opportunity presents and along a route such as the one proposed cannot be expected to restrict themselves to a dozen specified	Comment Number: 68 (continued) crossings. There is no security except heavy fencing that would prohibit casual crossing and the ARR should not pretend that such security exists, or will exist. The DEIS should not assume that the railroad would be a better all weather alternative transportation route between Eielson and Delta Junction unless it contains the basis of the assumptions. For example, if you were to research how many days the Richardson Highway between these termini has been closed to public traffic in the past 30 years AND compare that to the number of day the Alaska Railroad track between, say, Talkeetna and Nenana has been closed during the same period, the highway will look like a very good alternative indeed. With no use levels forecast in the DEIS except "trains per day" how is it possible to compare train usage? The applicant should not rely on the general concept of "poor soils" to not consider other minor re-routes to the alternatives. The present track system between Seward and Fairbanks crosses some very poor soils and has crossed them for all the years of operation. Soil conditions are one of the issues influencing alignment selection but there is too much history of the successful use of poor soils to qualify, for example, permafrost as a high priority. The abstract in the DEIS is misleading because it lacks a description of social impacts to developed property, the effects of being a linear barrier to recreational uses and the proximity impacts to a few developed remote areas that are just glossed over in the document. Also, the cause and effect basis in the purpose and need is very weak. For example, one of the "needs" is access to the military training areas yet the route selection completely misses the Donnelly Training Area west of the Delta River. From the perspective of resource uses by our constituents, we would like to see analysis of a route along the border of the Donnelly Training Area. Such a route would fulfill the need statement of military access and the railroad corridor would serve as an identifiable boundary between the public and publicly used land and the military land. The routes bisect the Tanana Flats Training Area so there they do access the military training area. When the route is quite a ways from the military boundary there remains the need for the Army or military to plan, permit and construct additional access across public land to get from the railroad to their facilities. The "eliminated alternatives", again very general in nature, is a weak concept in the DEIS. The examples don't serve the stated purpose and need so how can they be reasonable alternatives? In the DEIS Table S 2 under land use the only listing for much of the route is "impacts to hunting". We request that fishing and trapping be considered and the potential for significant limiting on elimination of such access be addressed. The Summary and Comparison of Potential Impacts appears to only involve direct or physical impacts and not include proximity impacts. There is no consideration listed here for potential linear impacts to access across the tracks. The routes do pass close to residences in the Eielson and Sakha areas but also pass close to developed remote "subdivision" lands along the Tanana River and it's sloughs. Those Alaskans who bought and developed those parcels for recreation, hunting, trapping and fishing should be included in the impact analysis in this DEIS.
---	--

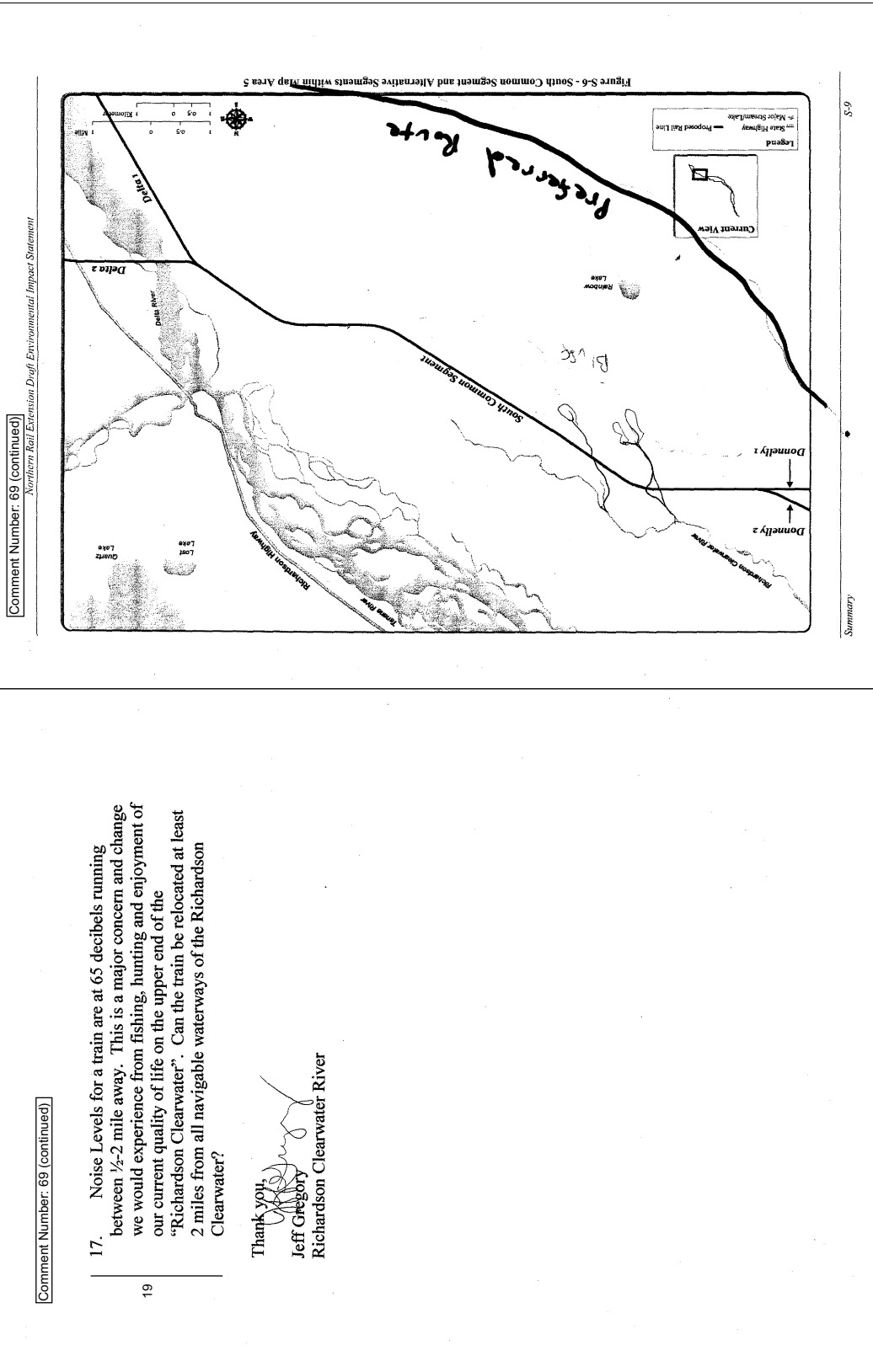
Comment Number: 68 (continued) Our hope is that in the Final EIS you will expand the consideration of routes to enable the project to be a better neighbor and fit in with the existing uses of the corridor. Thank you for the opportunity to comment.  Mike Tinker for the Fairbanks Fish and Game Advisory Committee Box 289 Ester, AK 99725	Comment Number: 69 January 27, 2009 David Navecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street S.W. Washington, D.C. 20423-0001 Mr. Navecky, The following points are my concerns with the Draft Environmental Impact Statement. My concerns are near a populated settlement called the "Richardson Clearwater" and is near the "South Common Segment" between "Donnelly 1 and Delta 2" The "Richardson Clearwater" is a spring fed Clearwater stream home of highly productive for spawning grayling. Streams in the interior of Alaska. A few other similar rivers are called Five-mile clear creek, Richardson Clearwater and Delta Clearwater. The water flowing down these rivers bubbles up from the "Aquifers" along the upper ends of the rivers. The rivers are crown jewels of the Tanana Drainage System. The "Richardson Clearwater" is a unique eco-system and needs protections from development projects such as the railroad proposed in the EIS. Residents are mostly summer recreational users many of whom live there retired at their homes and cabins. 1. Noise from the trains is a concern and no noise and vibration analysis is included in the EIS, for this area of the Richardson Clearwater "South Common Segment".
--	---

Comment Number: 69 (continued)

2. The route crosses the "Richardson Clearwater" in at least two locations or more at the head waters of two tributaries. This is a major concern for the Grayling, White fish and Salmon spawning species of fish. What study has been done about the impact of the fish population during and after construction?
3. What study has been done about risk assessments if an incident or major spill occurred in the wetlands and streams on the Richardson Clearwater? Has there been an approved spill response and contingency plan for the area of the South Common Segment?
4. Is there any construction camps or gravel pits planned for the "South Common Segment"?
5. The areas of the Railroad crossing the Richardson Clearwater all should provide acceptable design for boat travel under the bridges. These are navigable waters with local property owners and others using the area for hunting, hiking, fishing and camping. Access should not be restricted from the upper reaches of the streams. Since the 1960's I personally have traveled, fished and hunted by boat and four wheelers along the area of the "South Common Segment"
6. The South Common Segment route is not acceptable and should be moved further to the south close to the Military Training Boundary Line and South of Rainbow Lake. This would satisfy most of my concerns.
7. Construction phase of the project should not close access to popular hunting areas or fishing area to include the Richardson Clearwater and Rainbow Lake Trail System. Are closures expected?
8. Rail Crossings should be installed at all trail crossings. We use the area for hunting and fishing on four wheelers and railroad should not block trails off; nor should they cause major detours for the trail users. Can rail crossings be installed at regularly used trails?

Comment Number: 69 (continued)

9. When construction is done to cross major wetlands and the aquifers of the "Richardson Clearwater" will the construction of rail bed and the bridge pilings negatively affect the water flow from the aqua fur? What is the impact of vibration and noise on the aqua fur and the spawning species of fish during and after construction?
10. To reduce noise level along the track the EIS has not addressed brush clearing or narrowing to reduce noise.
11. Will the Railroad being built have an affect on the moose population, along the Richardson Clearwater, by restricting migration across the tracks? This sh¹ld be studying before any decision on the project.
12. What types of cargo will the railroad be hauling in the future? Any petro chemical or other hazardous materials? How would this affect the Richardson Clearwater environmentally is there was a spill?
13. The bridge crossings are located near thriving beaver communities and other wildlife including river otters, minks, eagles, falcons, hawks, owls, ducks and seagulls. What is the environmental risk of this project being built over the top of the aqua fur and wetlands of the Richardson Clearwater?
14. EIS states a year round road along the Railroad bed to open after and during construction. What impact will this have from an environmental concern?
15. Department of Natural Resources Don Perrin stated to us that if there is going to be a road it should be open to the public. What impact will this have on the wildlife and environment?
16. STB is required in the Transportation Act to be a "good neighbor" and the property owners of the Richardson Clearwater expect nothing less. Our wish is to relocate the route to the south connecting Donnelly 1 following a new route along the military boundary south of Rainbow Lake and connecting to Delta 1 and/or Delta. Can this be done?



Comment Number: 70



E1-16415

William C. & Joyce A. Whipple
P.O. Box 5899, North Pole, AK 99705
Phone: (907) 488-6201 - Cell (907) 347-0959

February 2, 2009

TO: Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

RE: STB Finance Docket No. 35468, Alaska Railroad Corporation - Petition for Exemption To Construct and Operate a Rail Line Between North Pole, Alaska, and Delta Junction, Alaska; Issuance of Draft Environmental Impact Statement

To Whom It May Concern:

I am writing this on behalf of myself, Joyce A. Whipple, and my husband, William C. Whipple. Our residential address is: 4301 Eielson Farm Road, North Pole, AK 99705; however, our mailing address is: P. O. Box 56199, North Pole, AK 99705.

We appreciate you sending us copies of the Environmental Impact Statement for referenced project, and can see that a lot of thought and research went into preparing it. It appears that you did a thorough job, and are trying to restrict the impact on the environment with the least amount of negativity. We do thank you for all of the work that is going into this project. However, whenever you go into a populated neighborhood with a project of this magnitude, there are going to be adverse results for many of the people living in the area.

Since we live in the Eielson Farm Road area, that is the area we are most familiar with and concerned about. We are lucky as one of the routes originally suggested would have been approximately 100 feet or less from our home, and we weren't sure exactly what would happen if it had been selected. We attended a meeting about 2 years ago about it, and the people in charge of the meeting weren't aware that most of the land in the Eielson Farm Road area is designated as "agricultural land" and has restrictions on the title. The land with these restrictions, according to State law, can only be subdivided one time, cannot be split up into more than 4 pieces, and all of the pieces must be at least 40 acres or more. The person holding the meeting several years ago was not aware of this restriction. We also attended another meeting last month and the people holding that meeting didn't seem to know about the restrictions on the land in the Eielson Farm Road area. I suppose you could get some sort of special State legislation where you could take however much land you need for this railroad project, but no-one we've ever talked to seems to know how that would work. Since the route that would really have impacted us has been dropped, we didn't submit any written concerns.

Comment Number: 70 (continued)

TO: Surface Transportation Board

Page 2

February 2, 2009

I have recently learned that this project could have an adverse impact on one of my neighbors, Robyn Davies. She and her husband, Stuart Davies, subdivided their agricultural land a few years ago, and her daughter's home, which was only built about a year ago, was built on one of the subdivided parcels, and it is apparently right in the way of one of the routes that is under serious consideration.

We strongly urge that you select a route with the least impact on the people living in the areas where the railroad will go, including the Eielson Farm Road area, as well as all of the other areas. There are vast pieces of land owned by the State of Alaska, and the Federal Government. Since the main reason for the railroad extension appears to benefit the military, why not put the route on military land where it's possible. If that isn't possible, at least take every option possible to avoid peoples' homes.

Thank you for allowing us to submit our concerns.

Sincerely,

William C. Whipple
WILLIAM C. WHIPPLE

Joyce A. Whipple
JOYCE A. WHIPPLE

Comment Number: 71 MAYER • BROWN Mayer Brown LLP 1909 K Street, N.W. Washington, D.C. 20006-1101 Main Tel (202) 263-3000 Main Fax (202) 263-3300 www.mayerbrown.com Kathryn Kuske Floyd Direct Tel (202) 263-3223 Kuskekfloyd@mayerbrown.com February 20, 2009 VIA HAND-DELIVERY Ms. Victoria J. Rutson Chief, Section of Environmental Analysis Surface Transportation Board 395 E Street, S.W. Room 1106 Washington, D.C. 20423 Re: Finance Docket No. 34658, The Alaska Railroad Corp. -- Petition For Exemption From 49 U.S.C. §10901 To Construct and Operate a Rail Line Between North Pole, Alaska and Delta Junction (Northern Rail Extension) Dear Ms. Rutson: Enclosed for your consideration, please find comments of the Alaska Railroad Corporation regarding certain mitigation measures set forth in the DEIS. Please let us know if you have any questions. Sincerely,  Kathryn Kuske Floyd Attachment cc: David Navecky Alan Summerville Brian Lindamood	Comment Number: 71 (continued) ARRC's Comments on DEIS Mitigation Measures 1. The Applicant shall not place bridge piers or abutments in known areas of permafrost. Comment: Nearly every ARRC railroad bridge north of Denali Park is located on permafrost. This mitigation measure is impracticable and unreasonable for the Applicant to implement. It would require the elimination of virtually all bridge structures in the project area. It is ARRC's practice to avoid permafrost areas when practicable. ARRC therefore requests that this measure be deleted in the FEIS. 2. Features of the rail line project that would occupy areas of permafrost shall be constructed to minimize thaw and subsidence. Construction methods might include insulate/fill methods in permafrost areas that could not be avoided during excavation. Comment: ARRC continues to work with geotechnical experts and regulatory agencies to minimize thaw and subsidence impacts to frozen ground from project construction to the extent practicable and reasonable. ARRC notes that insulate/fill techniques were state-of-the-art over the past 30 years or so. ARRC suggests that this measure be rephrased to recognize the possibility that more modern, less invasive techniques in managing frozen soils might be implemented as follows: "Features of the rail line project that would occupy areas of permafrost shall be constructed to minimize thaw and subsidence as practicable and reasonable, taking into account currently proven techniques." 3. Any material source development and rehabilitation within floodplains shall follow the general procedures and guidelines outlined in North Slope gravel pit performance guidelines (McLean, 1993). Comment: The North Slope Gravel Pit Performance Guidelines referenced in the DEIS are commonly incorporated in permit conditions set by DNR and ADF&G for material mining within flood plains throughout Northern Alaska. These guidelines are incorporated due to the geotechnical conditions in rivers on the North Slope which are frequently frozen throughout the year. This project is located in a discontinuous permafrost zone of central Alaska. As a result, certain techniques, conditions, and requirements outlined in the referenced guidelines may not be applicable or practicable in the project area. ARRC therefore suggests that the language of the mitigation measure be rephrased in the FEIS to include "where applicable" as follows:
---	--

Comment Number: 7.1 (continued) • Any material source development and rehabilitation within floodplains shall follow the general procedures and guidelines, where practicable, outlined in North Slope gravel pit performance guidelines (McLean, 1993)." VM-9. Culverts shall be designed and constructed for new fish-stream crossings with a width greater than or equal to 125 percent of the width of the stream at the ordinary high water stage. The culvert grade shall approximate the surrounding slope of the stream channel. Whenever possible, new culverts shall be buried to approximately 40 percent of their diameter with substrate material that would remain stable at expected flood discharge rates. This shall not apply to any water crossing more than 15 feet in bank-to-bank width due to span length limitations. Alternative design measures shall be required to meet the same design goals on streams more than 15 feet wide at ordinary high water. Comment: ARRC is continuing its work with regulatory agencies in the design and selection of the most practicable means for the crossing of waterbodies. ARRC has learned of an existing Memorandum of Agreement ("MOA") between ADOT and ADF&G that treats the issue of fish passage in a more thorough and comprehensive manner than that proposed in VM-9 by Applicant. (See attached MOA). In light of this MOA, ARRC believes it appropriate to request that VM-9 be re-phrased in the FEIS as follows: "For all proposed crossings of anadromous waters incorporating culverts, Applicant shall design said structures in accordance with the Memorandum of Agreement between ADOT and ADF&G dated August 3, 2001 which is entitled 'DESIGN, PERMITTING, AND CONSTRUCTION OF CULVERTS FOR FISH PASSAGE:'"	Comment Number: 7.1 (continued) • Minimize to the extent practicable the total number and footprint area of facilities (e.g., for borrow areas, by hauling material longer distances to avoid environmentally sensitive areas adjacent to water bodies; and for access roads, by minimizing width). • Develop construction, minimize the duration and extent of activity to develop the facilities and provide surface treatments to minimize soil compaction (e.g., scarify compacted soils through the compacted zone during reclamation to promote infiltration) and promote vegetation regrowth, including a reclamation plan that addresses rehabilitating recharge characteristics to maintain long-term hydrologic stability, habitat, and final usage (e.g., recreation, aquatic habitat). Plans for excavation depths shall be developed in cooperation with appropriate agency staff to both minimize areal extent (by maximizing depth) and maximize post-project function (through such measures as leaving shelves or gently sloping littoral areas). Comment: This mitigation measure does not lend itself easily to implementation due to its numerous subparts and complexity of language. To clarify and enhance the implementation of this proposed mitigation measure, ARRC suggests the following rephrasing in the FEIS: "In consultation with US Fish & Wildlife and the Alaska Department of Fish and Game, the Applicant shall locate ancillary facilities (construction camps, borrow areas, and railroad facilities located off the proposed right-of-way and the access roads thereto) to minimize size and impacts to sensitive habitat areas when practicable. Off-right-of-way areas will be restored in accordance with a reclamation plan developed in cooperation with appropriate agency staff."
4. During the final design process and facility siting, the Applicant shall conduct pre-siting investigations of potential borrow areas, staging areas, camps, and access roads to: - Identify the highly sensitive areas within the project area (in consultation with U.S. Fish and Wildlife Service and Alaska Department of Fish and Game) and locate facilities in previously disturbed sites and not in sensitive habitat areas, to the extent practicable. - Avoid to the extent practicable areas that could affect or be affected by flooding (especially with frequent recurrence intervals during the construction window); areas that have moderate to high densities of fine-grained permafrost soils, especially if the permafrost area is adjacent to or nearby a waterbody; and areas that are otherwise sensitive.	6. The Applicant shall avoid potential ice-jam locations and permafrost areas, fine-grained sediments, and steep, high streambanks when locating ice bridges and approaches. Specially adapted best management practices shall be applied for construction activities within these types of areas. For example, the Applicant shall slot ice bridges in several areas to accommodate faster disintegration of the bridge during the spring breakup period. Comment: Ice bridges are subject to permit requirements for the location, construction, maintenance, and ultimate disposition of ice bridges. Although regulatory agencies generally take all of the above-referenced measures into account in the granting of such permits, these agencies may or may not desire to have the bridges slotted after their usefulness has waned. Based on this practice, ARRC suggests the last sentence of this measure be deleted in the FEIS in order to provide the agencies with greater flexibility in their regulatory responsibilities and best management

Comment Number: 71 (continued)	of the site specific conditions and resources. As modified, the mitigation measure would read as follows in the FEIS: "The Applicant shall avoid potential ice-jam locations and permafrost areas, fine-grained sediments, and steep, high streambanks when locating ice bridges and approaches to the extent practicable. Specially adapted best management practices, or specific requirements of appropriate authorizing agencies, shall be applied for construction activities within these types of areas."
10.	As previously discussed, bridges and culverts shall be designed, constructed, and operated to maintain existing water patterns and flow conditions as practicable. At a minimum, large rail bridges shall be designed for a 100-year flood to pass through with less than 1 foot of rise in the tail-water elevation. The designs shall also consider local and broad backwater effects associated with large flood events on major tributaries, including potential flooding scenarios associated with the Chena River Flood Control project. Comment: ARRC has consulted with local, state and federal regulatory agencies to address issues associated with seasonal flooding of the Tanana River and has developed a design solution that yields an estimated 100-year flood elevation immediately upstream of the proposed Tanana Crossing locations in excess of one foot. This design conforms with FEMA's specific and rigorous design and regulatory procedures to provide for project impacts resulting in changes in floodwaters in excess of one-foot.
6	Crossing the Tanana River with less than an estimated headwater elevation of less than one foot is not practicable. The lack of presently available information on other waterbodies makes full analysis of consequences difficult at this time. In recognition of the project conditions and the regulatory framework, ARRC suggests that this mitigation measure be rephrased in the FEIS as follows: "All bridge structures shall be designed to pass the 100-year flood event. Applicant shall further comply with all relevant FEMA guidance, regulations, and procedures in the design and permitting of the crossings of waterbodies and floodplains with established floodway models maintained by FEMA."
11.	During final design, rail line and access roads located in floodplains shall allow for the flow of floodwaters to floodplain storage areas by incorporating a sufficient number and size of culverts or bridges. The Applicant shall conduct site-specific analyses that incorporate flood conveyance and hydraulics and flood storage requirements of the 100-year flood as part of the design. For crossings within the mapped 100-year
Comment Number: 71 (continued)	floodplain, the Applicant shall design drainage crossing structures to pass a 100-year flood without increasing the surface water elevation of the base flood by more than 1 foot, consistent with Federal Emergency Management Agency regulations (44 Code of Federal Regulations Part 9). Comment: For the reasons described in ARRC's Comments to Mitigation Measure #10 above, ARRC suggests that Mitigation Measure #11 be deleted in the FEIS.
14.	As suggested in the U.S. Environmental Protection Agency 1996 report on the functional profile of black spruce wetlands in Alaska, the Applicant shall protect water quality functions of adjacent wetlands by using calcareous fill to buffer acid deposition; manipulating warm, aerobic fill surfaces to degrade organic contaminants; and creating constructed wetlands for uptake of metals (Post, 1996). Comment: Although the above-referenced report discusses that water quality functions of adjacent wetlands may be protected through the use of calcareous fill, such discussion was not presented by the EPA in the context of generally required mitigation for projects. ARRC also notes that inasmuch as black spruce wetlands represent the most sizable amount of wetlands in the project area, there would appear to be no need to impose a specific mitigation measure based on the anticipated potential impacts. ARRC therefore suggests that this mitigation measure be deleted in the FEIS.
16.	As specified in the U.S. Army Corps of Engineers Alaska District's Nationwide Permits General Best Management Practice guide (USACE, 2007b): • Sediment and turbidity at the work site shall be contained by installing diversion or containment structures. • Dredge spoils or unusable excavated material not used as backfill at upland disposal sites shall be disposed of in a manner that minimizes impacts to wetlands. • Wetlands shall be revegetated as soon as possible, preferably in the same growing season, by systematically removing vegetation, storing it in a manner to retain viability, and replacing it after construction to restore the site. • Stream banks shall be restored and revegetated using techniques such as brush layering, brush matting, and use of jute matting and coir logs to stabilize soil and reestablish native vegetation.
9	5

Comment Number: 71 (continued) - Topsoil and organic surface material, such as root mats, shall be stockpiled separately from overburden and returned to the surface of the restored site. - Fill materials that are free from fine material shall be used. - The load of heavy equipment shall be dispersed such that the bearing strength of the soil shall not be exceeded, either by using mats when working in wetlands or by using tracked rather than wheeled vehicles. Comment: This project requires a permit from the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act. Assuming that such permit is issued after USACE review, it will contain its own mitigation or minimization conditions which the agency will tailor as part of its regulatory process under the 404 (b)(1) guidelines and public interest review. It can be anticipated that the permit conditions for this project will be more specific than those contained in the above-cited guidance document, and may, in fact, vary from the language in the proposed in this mitigation condition. In addition, BMPs for sediment and erosion control would be determined by the construction contractor(s) and included in their SWPPPs prepared in accordance with the NPDES Construction General Permit. It is possible that implementation of the mitigation requirements set forth in the DEIS may not represent the most prudent or best management practices for the conditions. Therefore, ARRC suggests that this mitigation measure be replaced in the FEIS with the following: <i>"The Applicant shall obtain a federal permit under the Clean Water Act Section 404 required by the USACE for project-related encroachment of jurisdictional waters of the U.S. and a National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit from EPA for project-related construction activities."</i>	
Comment: Gravel mining within braided waterbodies is a relatively common occurrence within the project area, and is strictly regulated by DNR. However, as the wording of this mitigation measure would seem to severely restrict the Applicant's ability to undertake this practice, ARRC suggests the following rewording in the FEIS: <i>"Gravel mining required for construction will not be permitted within the established active channel of a watercourse unless otherwise authorized by the Alaska Department of Natural Resources Division of Mining, Land, and Water, after consultation with Alaska Department of Fish and Game. Mine site development and rehabilitation within active channels of rivers shall follow the general procedures and guidelines as required by DNR and ADF&G."</i>	18. Road and track crossings of water bodies shall be aligned perpendicular or near perpendicular to watercourses to minimize crossing length and potential bank disturbance. Comment: Due to geometry constraints and the meandering nature of the waterbodies in the area, it is not possible to cross all proposed waterbodies in a perpendicular fashion. To accommodate these circumstances, ARRC suggests that "where practicable" be inserted into the mitigation measure in the FEIS as follows: <i>"Road and track crossings of water bodies shall be aligned perpendicular or near perpendicular to watercourses, where practicable, to minimize crossing length and potential bank disturbance."</i>
Comment Number: 71 (continued) 21. Construction of temporary crossings shall be minimized by installing bridge piers during the winter and initially constructing permanent crossing structures when practical. Comment: Although ARRC recognizes that the preferred timeframe for bridge pier construction is the winter months, the extreme winter climate of the project area (with temperatures significantly below zero degrees Fahrenheit for much of the winter) makes construction "during the winter" extremely costly, difficult to manage and unpredictable. Certain construction operations are not feasible at these temperatures. Although the recommended language appears to acknowledge this issue, ARRC suggests the following revision so that the measure is clearer: <i>"Temporary crossing structures shall be constructed in a manner that minimizes disturbances to stream bed, banks, and flow where practicable. The Applicant shall take into consideration the construction of bridge structures during the winter where practicable."</i>	24. Gravel mining required for construction or operations shall be restricted to the minimum necessary to develop and operate the rail line efficiently and with minimal environmental damage. Gravel mine sites shall not be located within the active floodplain of a watercourse unless the Alaska Department of Natural Resources Division of Mining, Land, and Water, after consultation with Alaska Department of Fish and Game, determines that there would be no feasible and prudent alternative, or that a floodplain mine site would enhance fish and/or wildlife habitat after mining operations were completed and the site was appropriately closed. Mine site development and rehabilitation within floodplains shall follow the general procedures and guidelines outlined in North Slope gravel pit performance guidelines (Moleen, 1993).

Comment Number: 71 (continued) 25. Geotechnical boreholes can allow communication or commingling of waters between surface water and groundwater and between subsurface aquifers if the boreholes are deep enough, which could result in the contamination of groundwater. Geotechnical boreholes shall be abandoned in compliance with the requirements of Alaska Department of Environmental Conservation 18 Alaska Administrative Code 80.015(e). Comment: This mitigation measure should be revised to remove extraneous information. ARRC recommends deleting the first sentence, so the mitigation measure would read as follows: "Geotechnical boreholes shall be abandoned in compliance with the requirements of Alaska Department of Environmental Conservation 18 Alaska Administrative Code 80.015(e)." 26. Spill barriers or absorbent material shall be provided at the down-gradient ends of staging areas and camp sites to contain any potentially contaminated surface runoff. Erosion and sediment controls shall also be required as needed at these locations. Comment: All surface runoff from the construction site will be subject to NPDES permitting requirements. ARRC intends to work with regulatory agencies to incorporate the most appropriate means for the containment of spills and pollutants. Because these issues will be comprehensively address in the NPDES permitting requirements and it is premature to set means and methods, ARRC recommends replacing this mitigation measure in the FEIS with the following: "The Applicant shall obtain a National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit from EPA for project-related construction activities." 28. Tank storage facilities shall be placed at the farthest practical locations away from any streams or rivers, and standard protocols (i.e., lined and bermed pits for secondary containment) for storing chemical and petroleum products shall be implemented. The Applicant shall consult with Alaska Department of Environmental Conservation to determine appropriate measures and distances. Comment: ARRC notes that regulatory requirements for the storage and handling of tank facilities will likely be under the purview of other agencies in addition to ADEC. ARRC also believes that the language of the measure in the DEIS predetermines measures and distances. Those aspects of construction should be deferred until consultation by the Applicant with appropriate regulatory agencies. ARRC therefore suggests that the language be rephrased in the FEIS to read as follows:	Comment Number: 71 (continued) "Tank storage facilities shall be placed as far as practical from streams or rivers, and applicable regulatory requirements (i.e., lined and bermed pits for secondary containment) for storing chemical and petroleum products shall be implemented. The Applicant shall consult regulatory agencies to determine appropriate regulations and associated requirements." 30. The proposed rock revetment of the Salcha Alternative Segment 1 crossing would restrict or eliminate the current flushing flows that reduce beaver dams along Piledriver and Twentythree Mile Sloughs. To mitigate for permanent habitat alteration, the Applicant shall provide for removal of large beaver dams that would otherwise become permanent. Comment: ARRC continues to have discussions with the regulatory agencies regarding the need for mitigation of beaver dams on Piledriver Slough. ARRC recommends the language to be changed in the FEIS to reflect these discussions as follows: "The proposed levee along the north bank of the Tanana River as required for Salcha Alternative Segment 1 crossing would restrict or eliminate the current flushing flows that reduce beaver dams along Piledriver and Twentythree Mile Sloughs. The Applicant shall consult with ADEC and GFG for the development of appropriate mitigation of beaver dams on the upper Piledriver Slough to be carried out during construction." 31. Where practicable, the Applicant shall make minor refinements to the proposed alternatives to avoid destruction or fragmentation of sensitive vegetation communities if they are encountered during surveying and preconstruction activities. Sensitive habitats include high-functioning wetland communities, fens, and late-succession forests. Comment: This mitigation measure appears to be inconsistent with DEIS Section 4.5, Unique or Sensitive Wetlands section (pg 4-52). Fens are the only wetland type identified as "Unique or Sensitive" and none appear to be present within the project area. Other than fens, sensitive habitats were not clearly defined in the resources sections of the DEIS. Because no fens, high-functioning or late-succession forests appear to be present within the project area, ARRC recommends this mitigation measure be re-phrased as follows: "Where practicable, the Applicant shall make minor refinements to the proposed alternatives to avoid destruction or fragmentation of sensitive vegetation communities if they are encountered during surveying and preconstruction activities."
--	--

Comment Number: 7.1 (continued)	First, to minimize the number of material borrow pits, additional trucks will be required due to the longer distances traveled. The size of the trucks (estimated to be 18-20 feet wide) makes their passage on a single embankment difficult unless it is made wider than would otherwise be necessary for the long-term serviceability of the railroad (in excess of 46-48 feet). Further, the need to move all traffic over a long linear corridor from a single access point at one end (the crossing of the Tanana River near Salcha) will add additional construction-related traffic such that the only safe course is to separate the traffic into two separate one-way lanes. East-bound traffic would utilize the proposed separate access road, and west-bound traffic would utilize the proposed railroad grade. Second, by the terms of Alaska state law, ARRC is required to make its right-of-way available for use as a utility corridor. Thus, non-railroad vehicles occasionally move along the railroad right-of-way for inspection and maintenance activities of the utilities. Further, to mitigate for what would ultimately be multiple crossings of the military's access roads on Tanana Flats, and between Tanana Flats and Donnelley, the access road is intended to replace the existing roadway that the military uses, as well as provide safe, year-round access to potential utility providers which would result in a minimal amount of over-land travel of vehicles. Third, movement of vehicular traffic along the railroad right-of-way concurrent with train operations is governed by federal law and railroad operating rules. It is simply not feasible to provide for the other required uses of the corridor without providing for a separation between the railroad embankment and the access road. Fourth, there are safety considerations to consider. The project has been designed for train traffic to move at 79-miles per hour. The sight distance required for a train to stop due to a violation of the vehicular envelope resulting from a conjoined access road, or due to other uses or trespassers in the corridor, is well in excess of two-miles; a distance which cannot be consistently relied upon for railroad operations. Due to the availability of alternate access to the proposed right-of-way on the north side of the Tanana, ARRC has only proposed a separated embankment on the south side of the Tanana River. Furthermore, the proposed separated embankments are expected to fall within the proposed 200-foot corridor throughout most of the alignment. As the DEIS has calculated potential impacts based upon a footprint comprising the entire right-of-way corridor, any impacts resulting from this area of separation have already been taken into account. Based on these reasons, ARRC suggests that this measure be deleted in the FEIS.	19
Comment Number: 7.1 (continued)	32. To reduce collision and electrocution impacts to birds resulting from powerlines and communication towers, the Applicant shall: - Consult with the U.S. Fish and Wildlife Service for current guidelines on tower siting, marking, and guy lines. - Incorporate standard, safe designs, as outlined in Suggested Practice for Avian Protection on Power Lines (APLIC, 2006), into the design of electrical distribution lines in areas of identified bird concerns to avoid electrocution of eagles, owls, and other smaller raptors, including: • Design communication towers without guy lines. • Use marking techniques such as balls or flappers to increase transmission line visibility, especially in areas where sandhill cranes and bald eagles are likely to roost, forage, or nest. • Maintain a minimum 60-inch separation between conductors and/or grounded hardware and potentially use insulation materials and other applicable measures, depending on line configuration, to avoid electrocution of eagles, owls, and other smaller raptors. • Incorporate standard raptor-proof designs as outlined in Avian Protection Plan Guidelines (APLIC and USFWS, 2005) into the design of the electrical distribution lines to reduce bird collisions. Comment: The use of guy wires for communication tower structures is the only practicable means to provide for structural stability given the differential settlement common to soils in the project area. Because the design of communication towers without guys is not practicable or feasible, ARRC therefore suggests that the restriction in the first bullet be deleted in the FEIS. In addition, certain aspects of this mitigation measure requiring high-visibility balls and flappers appears to contradict Mitigation Measure #70 that requires the towers to be designed to blend in with the landscape. ARRC requests that these issues be clarified in the FEIS.	18
Comment Number: 7.1 (continued)	33. The Applicant shall locate the access road immediately adjacent to the railroad to the extent feasible and prudent to minimize the project footprint, amount of ground disturbance, clearing of established vegetation, removal of wildlife habitats and riparian vegetation, and establishment of vegetation near the railroad that is attractive to moose. Comment: The access road on the south side of the Tanana River is proposed to be physically separated from the railroad embankment where possible. There are a number of reasons why this is the case.	19

Comment Number: 71 (continued) equipment or material source development, may be allowed on a case-by-case basis. - All ice crossings shall be drilled before equipment crossing to determine the ice thickness. - Alteration of river, stream, or lake banks or beds, except for approved permanent crossings, shall be prohibited. - The operation of equipment, excluding boats, in open water areas of rivers and streams shall be prohibited. Exceptions for water withdrawal shall be permitted on a site-specific basis. - Ice or snow bridges and approach ramps constructed at river, slough, or stream crossings shall be substantially free of extraneous materials (for example, soil, rock, wood, or vegetation) and shall be removed or breached before spring breakup. - Bridges are the preferred watercourse crossings in fish spawning and important rearing habitats. In areas where culverts are used, they shall be designed, installed, and maintained to provide efficient passage of fish. Comment: ADF&G has authority to issue Title 16 Fish Habitat Permits and generally includes detailed conditions in such permits. It is possible that implementation of these mitigation requirements may not represent the most prudent form of mitigation. ARRC therefore suggests deletion of this measure in the FEIS or revision of the language to indicate "... the measures listed below may be imposed ...".	Comment Number: 71 (continued) As part of the National Pollutant Discharge Elimination System Stormwater Construction Permit and Stormwater Pollution Prevention Plan, standard best management practices that minimize impacts to vegetation shall include: - Minimizing the removal or disturbance of vegetation within the right-of-way (ROW); - Minimizing contact with roadside sources of weed seed that could be transported to other areas; - Using low ground pressure equipment to minimize disruption to vegetation and soil; - Developing and implementing aggressive management programs to limit colonization by invasive species plants and eradicate any invasive species within the rail ROW and support facilities; - Using only certified weed-free straw and mulch for erosion control; - Ensuring that adequate topsoil depth (minimum 4 inches) and textures are in place and promptly reseeded or revegetating using only plant species native to Interior Alaska; - Using only seed meeting certified standards pursuant to 11 Alaska Administrative Code 34.075; - Implementing dust control measures to stabilize soils from wind erosion and to reduce dust from construction activities; and - Restoring temporarily cleared construction areas to previous conditions, including topography and vegetation communities. Comment: BMPs for erosion control are typically determined by the construction contractor(s) and included in their SWPPPs prepared in accordance with the NPDES Construction General Permit. It is possible that implementation of these detailed mitigation requirements may not represent the most prudent form of mitigation. ARRC suggests deletion of this measure in the FEIS or revision of the language to indicate "... standard best management practices that minimize impacts to vegetation may include...". Under Title 16 of the Alaska Statutes, the measures listed below shall be imposed by the Alaska Department of Fish and Game for all activities below the ordinary high water mark in specified anadromous water bodies and in fish-bearing waters that could block fish passage. Exceptions to these requirements, including the use of spill containment and recovery
39. Detonation of explosives within, beneath, or in proximity to fish-bearing waters shall not result in overpressures exceeding 2.7 pounds per square inch unless the water body, including its substrate, was frozen solid. Peak particle velocity stemming from explosive detonation shall not exceed 0.5 inch per second during the early stages of egg incubation.	20
21 Comment: The specific conditions concerning detonation of explosives should be left to the discretion of ADF&G in issuance of a permit. It is possible that implementation of these mitigation requirements may not represent the most prudent form of mitigation. ARRC suggests deletion of this measure in the FEIS or modification of the language to include "unless otherwise approved by ADF&G" or "to the extent practicable".	38.
43. The Applicant, Alaska Department of Fish and Game, and Alaska Department of Natural Resources shall review and discuss potential methods of both rail design and warning systems to reduce moose-train mortality, such as:	12

Comment Number: 71 (continued) 50. railroad traffic through the project area exceeds the number documented in the EIS on an annual basis, the Applicant will consult with ADF&G on additional means and methods which may be implemented to reduce moose mortality." The Applicant shall schedule certain construction activities that could temporarily block access trails and waterways to occur during the winter to the extent practicable, especially activities related to bridge construction and near access points in the right-of-way, because travel is less restricted and use of the area is at lower levels during this season. Comment: It is possible that implementation of this mitigation requirements may not represent the most prudent form of mitigation. ARRC therefore suggests rewording as follows: "The Applicant shall schedule certain construction activities that could temporarily block access trails and waterways to occur during time of limited use or when alternate routes are most available to the extent practicable." VM-25. The Programmatic Agreement (PA) being developed by SEA, the Alaska State Historic Preservation Office, cooperating agencies, and consulting parties requires that areas within the limits of project disturbance that have not been surveyed be surveyed. Potential stipulations include:	Comment Number: 71 (continued) 22 - Maintaining vegetation along the right-of-way (ROW) in primary (e.g., grasses/sedges) or late (e.g., old-growth spruce) successional stages. If vegetation was allowed to progress to the secondary successional stage (i.e., shrubs), it shall be maintained at the shortest possible height, not to exceed 0.5 meter. Preferably, shrubs shall be of non-preferred moose browse species (e.g., alder, dwarf birch). Every effort shall be made to minimize re-growth of willow, paper birch, and aspen. Vegetation shall be mowed in late summer prior to energy stores being sent to the root systems. - In winter, plowing snow back from the track to the outer edge of the trackside clearing to allow moose easy access away from the tracks when a train approaches. - Not seeding grasses after approximately July 15, because fresh green growth has been noted to attract moose to ROWs during early fall, resulting in high rates of moose/train collisions. - Developing a plan in conjunction with Alaska Department of Fish and Game to catalog all strikes (not just confirmed or suspected deaths) in a timely manner that shall include, but is not necessarily limited to: precise location (latitude and longitude), date and time, sex and age of moose, weather and other environmental conditions at time and location of strike; and attributes associated with the train, such as horn use, speed, and track characteristics. - Designing, constructing, and operating all aspects of the rail line to minimize significant alteration of moose and other wildlife movement and migration patterns. Comment: ARRC already has a program in place with ADF&G whereby it provides specific and timely data regarding all animal strikes, not just moose. While the data outlined in this mitigation measure (specifically, the fourth bullet) is similar to existing ARRC procedures and guidelines, it is different enough to represent a departure from the system presently implemented on the remainder of ARRC's system. Therefore, because this measure would not be practicable to implement without changing the reporting program in place on the rest of ARRC's system, we therefore suggest that this section should either be deleted or re-written in the FEIS as follows: "The Applicant shall continue to record, maintain and dispose of animal strikes consistent with practices presently in place on the remainder of the railroad, including the annual documentation of moose strikes. Further, the ARRC shall implement existing maintenance practices currently employed on the rest of the system designed to deter or mitigate for potential strikes of game animals. If the number of moose killed by
Comment Number: 71 (continued) 23 VM-30. The Applicant shall continue its ongoing efforts with community officials to identify the public emergency response teams in the project area and shall provide, upon request, hazardous materials training. Before the start of operations, the Applicant shall contact the appropriate departments and agencies to provide them with information concerning the proposed operations to allow the departments and agencies to incorporate the information into local response plans.	14
Comment Number: 71 (continued) 23 VM-25. The Programmatic Agreement (PA) being developed by SEA, the Alaska State Historic Preservation Office, cooperating agencies, and consulting parties requires that areas within the limits of project disturbance that have not been surveyed be surveyed. Potential stipulations include: - The PA shall detail procedures and methodologies for identification of resources and reporting, reviewing, and implementing appropriate treatment measures for any cultural resources found within the project area. - The PA shall identify appropriate actions should previously undiscovered archaeological or cultural resource sites be unearthed during construction activities. Comment: As it would appear that this mitigation measure will be superseded by the execution of the proposed programmatic agreement and Mitigation Measure #49, ARRC suggests that it be deleted from the FEIS. VM-30. The Applicant shall continue its ongoing efforts with community officials to identify the public emergency response teams in the project area and shall provide, upon request, hazardous materials training. Before the start of operations, the Applicant shall contact the appropriate departments and agencies to provide them with information concerning the proposed operations to allow the departments and agencies to incorporate the information into local response plans.	15

Comment Number: 71 (continued)	Comment: ARRC suggests that the last word in this measure should read "practicable", not "possible", and that the measure be modified to address winter modes of transportation: "The Applicant shall coordinate with Alaska Department of Natural Resources to ensure that bridges and culverts on secondary streams (those not within the jurisdiction of U.S. Coast Guard) are designed to accommodate navigation by recreational boat users and winter modes of transportation in a manner that shall not impede existing ongoing uses, to the extent practicable." 58. If Eielson Alternative Segment 3 is included in any license issued by the Board, the Applicant shall consult with Eielson Air Force Base and Alaska Department of Fish and Game to determine the degree of impact to parking areas and campsites. Mitigation could include, but is not limited to, construction of alternative access roads to existing campsites, creating grade-separated crossings (thus negating the necessity of using locomotive horns for at-grade crossings), or moving campsites to locations outside the affected area. 59. If Eielson Alternative Segment 3 is included in any license issued by the Board, the Applicant shall consult with Eielson Air Force Base and Alaska Department of Fish and Game to determine the degree of impact on the parking area west of Grayling Lake. If the parking area would be reduced in size as a result of its proximity to the proposed rail centerline, the Applicant shall ensure adequate parking space outside of the right-of-way, which could include expansion of the parking area at its eastern end. Combined Comments on 58 and 59: Both measures 58 and 59 address the same potential impacts to military lands which are authorized for specified recreational use by permit only. It is the military that owns and manages these lands, not ADF&G. For clarity, ARRC believes that the measures 58 and 59 could be combined into one measure in the FEIS as follows: "If Eielson Alternative Segment 3 is included in any license issued by the Board, the Applicant shall consult with Eielson Air Force Base and other agencies as appropriate to determine the degree of impact to existing uses between the Richardson Highway and the slough which bounds Eielson Air Force Base to the southwest. Mitigation could include, but is not limited to, construction of alternative access roads to existing campsites, creating grade-separated crossings (thus negating the necessity of using locomotive horns for at-grade crossings), expansion of parking areas, or moving campsites to locations outside the affected area."	26
Comment Number: 71 (continued)	Comment: ARRC recommends rewording this measure for clarification, and to address what would happen in the event of a derailment or hazardous material release. "The Applicant shall coordinate with federal, state, and local emergency management officials in the project area. The Applicant shall provide, upon request, applicable hazardous-materials training and/or project related information to enhance readiness. The Applicant shall incorporate the new rail line into its existing Emergency Response process and shall update its Oil Spill Contingency Plan to include the new rail line." VM-35. For each of the public grade crossings on the new and existing rail line, permanent signs prominently displaying both a toll-free telephone number and a unique grade crossing identification number in compliance with Federal Highway Administration (23 Code of Federal Regulations Part 655) shall be provided. Applicant's personnel shall answer the toll-free number 24 hours a day. Comment: This voluntary mitigation measure inappropriately refers to "existing" rail line. That reference should be deleted and the measure be modified in the FEIS to read: "For each of the public grade crossings on the new rail line, permanent signs prominently displaying both a toll-free telephone number and a unique grade crossing identification number in compliance with Federal Highway Administration (23 Code of Federal Regulations Part 655) shall be provided. Applicant's personnel shall answer the toll-free number 24 hours a day." 53. The Applicant shall set bridge foundations and operate construction equipment during the winter when practicable. Comment: Per ARRC's comment on Mitigation Measure #21, the extreme winter environment will substantially limit construction activity in the winter. Accordingly, ARRC suggests the addition of the following sentence to this measure: "The Applicant shall take into consideration the construction of bridge foundations during the winter where practicable." 54. The Applicant shall coordinate with Alaska Department of Natural Resources to ensure that bridges and culverts on secondary streams (those not within the jurisdiction of U.S. Coast Guard) are designed to accommodate navigation by recreational boat users in a manner that shall not impede existing ongoing uses, to the extent possible.	24 25

Comment Number: 71 (continued) The second bullet requires that road crossing areas retain significant vegetation. This presents a safety concern as the sight-triangles required for a person or vehicle to adequately discern if it is safe to cross the tracks would be impaired. Regarding bullet three, the planting of vegetation around bridge piers is inconsistent with the present environment, and would likely require non-native species to survive. Further, the vegetation would likely encourage the accumulation of debris frequently transported by waterbodies throughout the project area. This represents a safety risk associated with the possible compromise of the structure, a safety hazard to water craft moving under the structure, and an unacceptable maintenance hazard. It would also interfere with bridge inspections, which are critical to ensuring safety. In light of the variety of safety, limited effectiveness and practical issues presented by the mitigation measure, ARRC suggest that the measure be deleted in the FEIS.	70. To reduce visual impact in areas of high visibility (such as residential areas): - Native vegetation shall be planted along the right-of-way to reduce the contrast with line, color, and texture. - In areas with hillcuts, slopes shall be shaped to reflect the natural landscape, where practicable, and planted with native materials to provide an amorphous and irregular form and rough texture. - Excess material shall be disposed of in a suitable fill location and not cast on downhill slopes. - To the extent consistent with safety considerations, structures shall be painted a color that blends with the existing vegetation, or self-weathering steel shall be used. Comment: ARRC believes that implementation of the first three bullets can only be achieved by expansion of the overall footprint of the project. In other words, as it would not be possible to implement the first three bullets in the area of the project right-of-way, these measures would be contrary to the overall desire to minimize the project footprint. The last bullet appears to be inconsistent with Mitigation Measure #32 (i.e., towers should be made clearly visible to birds, but also should blend into the landscape so people cannot see them). Based on these considerations, ARRC suggests that this measure be deleted from the FEIS.
Comment Number: 71 (continued) 62. The Applicant shall provide crossings for the following: the trail to the Blair Lakes Area; Silver Fox Lodge Trail; Alaska Department of Natural Resources (ADNR) Winter Trail (ARRC has included two crossings of this trail as part of the proposed action); Koolo Lake Trail; Donnelly-Washtburn Trail; ADNR Forestry Winter Road; and Rainbow Lake Trail. Comment: Several of these trails are crossed several times, and may be better served through re-location rather than a series of multiple crossings in the trail's present location. Further, additional trail crossings may be required in the future. As there is a state law concerning the transfer of right-of-way for this project, ARRC recommends that the mitigation measure be re-written in the FEIS as follows: "The Applicant shall work with DNR for the provision of crossings to maintain the connectivity of trails and other access as may be appropriate pursuant to Alaska State Law AS 42.40.460."	69. To minimize the visual impact of the cleared right-of-way: - Structures (excluding safety-related devices) associated with the build alternatives shall be located as far from crossings as practicable to avoid attracting visual attention and, in heavily vegetated areas, shall be painted to blend with the surrounding vegetation to the extent consistent with safety considerations. - Clearing at road crossings shall be minimized, which could be accomplished by leaving a few larger trees and some smaller trees and shrubs untouched, to reduce visual contrast and mimic natural clearings in the landscape, where consistent with safety measures. - Native trees and bushes shall be planted densely around the base of bridge supports located on land to break up the uniform lines, colors, and smooth textures of the bridge supports. - Bridges shall be painted a color to match the surrounding landscape. Where these bridges continue into the vegetation and for bridges over small streams and rivers, structures shall be painted a uniform dark color, such as dark green or black, to match the existing landscape. Comment: As a general matter, the structures proposed will be constructed from materials that are relatively neutral in color. The extreme climate of the project area prevents the application of coatings or "paint" (which are more readily used in the lower 48 states) and due to various environmental considerations. Further, the application of any specific hue would only be effective for less than half of any given year as the landscape is generally shades of white in the winter, green in the summer, and shades of brown in the shoulder seasons.

Comment Number: 71 (continued) MEMORANDUM OF AGREEMENT BETWEEN ALASKA DEPARTMENT OF FISH AND GAME AND ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES FOR THE DESIGN, PERMITTING, AND CONSTRUCTION OF CULVERTS FOR FISH PASSAGE This MEMORANDUM OF AGREEMENT (MOA) is made and entered into between the Alaska Department of Fish and Game, P.O. Box 25526, Juneau, AK, 99802-5526, hereafter referred to as the ADF&G, and the Alaska Department of Transportation and Public Facilities, 3132 Channel Drive, Juneau, AK, 99801-7898, hereafter referred to as ADOT&PF. ADF&G enters into this agreement under the authority of AS 16.05.050(13), 16.05.840 – 16.05.860, 16.05.870 – 16.05.900, 16.20.050 – 16.20.060, 16.20.094, 16.20.150(G), 16.20.162(G), 16.20.530 and 5 AAC 95. ADOT&PF enters into this agreement under the authority of AS 19.05.010 – AS 19.05.125. I. BACKGROUND AND PURPOSE OF THE MEMORANDUM OF AGREEMENT Anadromous and resident fish populations depend on reliable passage through drainage structures when migrating to spawning, rearing and over-wintering grounds. Barriers to fish passage can be a significant factor in fish population decline. The federal-aid funding received by Alaska for highway, transit and airport projects has grown and continues to grow. This has increased the number of Fish Habitat permits processed annually by ADF&G for culvert-related work by ADOT&PF in fish-bearing waters. This underscores the need for a statewide MOA to provide uniform and consistent guidance to project design and permitting staff. The State of Alaska is committed both to the maintenance and conservation of its fisheries resources and development of its transportation infrastructure in a safe and economic manner. Therefore, ADF&G and ADOT&PF agree to use the guidelines and procedures identified in this MOA to ensure that, where ADOT&PF and ADF&G have determined that culverts are the appropriate stream crossing structure and are utilized in fish-bearing waters, they are designed and installed to provide efficient fish passage and	Comment Number: 71 (continued) to ensure statewide consistency in Title 16 permitting of culvert related work. These review procedures and design criteria clarify and make certain that individual project review and permit requirements under AS 16.05.840, AS 16.05.870, and 5 AAC 95.400 – 5 AAC 95.990 with respect to fish passage requirements through culverts are met. This agreement extends solely to the design, permitting, and installation of culverts in fish-bearing waters. This includes both new culvert installation and reinstallation of culverts during maintenance activities. To the maximum extent feasible and practicable, retrofits of existing culverts shall comply with the relevant portions of this agreement. Non-complying retrofits will be authorized by ADF&G on a case-by-case basis. The agreement does not address any other statutory or regulatory responsibilities of ADF&G or ADOT&PF. Additional factors unrelated to fish passage (such as unique environmental considerations, locating culverts in anadromous fish spawning or high-value rearing habitat, or other public safety, engineering, or economic issues) will be addressed on a project specific basis during preparation of the ADOT&PF environmental document. II. APPLICATION This agreement applies to each agency as a whole and specifically to all headquarters, regional, and area personnel within ADF&G Division of Habitat and Restoration, and all personnel within the ADOT&PF Division of Design and Engineering Services, and regional Construction and Maintenance sections. III. ADF&G and ADOT&PF mutually agree: A. To apply the interim procedures, design criteria, and guidelines set forth in Exhibit A statewide for the design, permitting, and construction of culverts in fish-bearing waters. In agreeing to this covenant, ADF&G and ADOT&PF recognize that ongoing research is providing new tools and insight into fish passage design. Therefore, both agencies agree to annually review the interim procedures, design criteria, and guidelines as set forth in Part V.I.D and to amend this agreement as necessary to accommodate new information and proven fish passage techniques. B. That ADOT&PF is responsible for the selection, project engineering and technical design of fish passage structures consistent with the guidelines and criteria contained in Exhibit A. ADOT&PF will request assistance from ADF&G as needed to interpret and apply fish passage criteria. C. That ADF&G is responsible for identifying fish-bearing waters, design fish species and fish length(s), the time of year fish passage is required, type of stream (840 or 870), and anadromous spawning and high-value rearing sites. D. That permit disagreements involving interpretation or whether the provisions of this MOA have been fully complied with may be elevated first to ADF&G and ADOT&PF's regional supervisors, and secondarily to ADF&G's Director of ADF&G/ADOT&PF Fish Pass MOA 2 08/03/01
--	--

Comment Number: 71 (continued) Habitat and Restoration and ADOT&PF's Director of Design and Engineering Services, for timely and final resolution. Both agencies recognize the value of this process. Staff in both agencies is encouraged to make use of this process rather than allowing a disagreement to remain unresolved. Nothing in this MOA prevents either agency from resolving permit disagreements in accordance with the provisions of AS 16.05.840—16.05.860, AS 44.62.330—44.62.630, 5 AAC 95.710(c), and 5 AAC 95.920. IV. ADOT&PF agrees: A. To coordinate with ADF&G during the earliest possible project phase, but not later than the project's environmental phase, on all projects potentially affecting fish-bearing waters. B. To have all proposed fish passage structures, including those proposed by Maintenance and Operations, reviewed by the Regional Hydraulic Engineer or other qualified technical experts for compliance with the design criteria contained in Exhibit A. C. To provide ADF&G reasonable opportunity to field inspect culverts or as-built plans prior to project shutdown, demobilization, and/or release of the contractor(s), in order to ensure that all culverts are installed in accordance with permit terms and conditions. V. ADF&G agrees: A. To timely identify all fish-bearing waters that require fish passage and to provide a list of species present and habitat type present (i.e. spawning, rearing, etc.) B. To timely provide ADOT&PF with all available information listed in IHC of this MOA early in the design process. C. To request additional information, if needed, in a timely manner and in a consolidated form. Multiple, unconsolidated requests for information are discouraged. D. To timely approval of permit applications for culvert installations that comply with this MOA. This covenant is limited to fish passage considerations and does not extend to other components of a project review that are unrelated to fish passage, nor does it preclude ADF&G from requiring compliance with other applicable laws or regulations. VI. MUTUAL AGREEMENT AND UNDERSTANDINGS. It is mutually agreed that: ADF&G/ADOT&PF Fish Pass MOA 3 08/03/01	Comment Number: 71 (continued) A. Nothing in this agreement obligates any party in the expenditure of funds, or for future payments of money, in excess of appropriations authorized by law and administratively allocated for these purposes. B. Nothing in this agreement is intended to conflict with federal, state, or local laws or regulations. If there are conflicts, this agreement will be amended at the first opportunity to bring it into conformance. C. External policy and position announcements relating specifically to this agreement may be made only by mutual consent of the agencies. D. Both agencies shall meet jointly on at least an annual basis to discuss matters relating to this agreement. Many of the criteria and assumptions contained in this agreement are interim assumptions and subject to further refinement. Either agency may request an earlier review. No revision shall be binding to either agency without the written consent of both agencies. E. The effective date of this agreement shall be from the date of the final signature. F. Either party may terminate its participation in this agreement by providing to the other party notice in writing 30 days in advance of the date on which its termination becomes effective. G. Any material published or data acquired as a result of this agreement may be reproduced with credit given to the agencies or organizations responsible for the development of the material. ADF&G/ADOT&PF Fish Pass MOA 4 08/03/01
---	--

Comment Number: 71 (continued) (Intentionally Blank)	Comment Number: 71 (continued) SIGNATURES  Michael Downing, Chief Engineer Statewide Design and Engineering Services Alaska Department of Transportation and Public Facilities  Ken Taylor, Director Habitat and Restoration Division Alaska Department of Fish and Game  Kevin Brooks, Director Division of Administration Alaska Department of Fish and Game  Frank Rue, Commissioner Alaska Department of Fish and Game  Joseph Perkins, Commissioner Alaska Department of Transportation and Public Facilities
ADF&G/ADOT&PF Fish Pass MOA 6 08/03/01	EXHIBITS EXHIBIT A. Design, Construction, and Maintenance of Culverts in Fish-Bearing Waters. Pg. 7. EXHIBIT B. FISHPASS EXE Culvert Fish Passage Program and Technical Advisory. Pg. 19. EXHIBIT C. ADF&G AS 16.05.840 and 16.05.870 Permit Application Information Requirements for Culvert Installation or Maintenance in Fish Streams. Pg. 25. EXHIBIT D. Definitions. Pg. 27. EXHIBIT E. Literature Cited. Pg. 31. ADF&G/ADOT&PF Fish Pass MOA 5 08/03/01

Comment Number: 71 (continued) EXHIBIT A Design, Construction and Maintenance of Culverts in Fish-Bearing Waters Contents: - Section 1 Background and Purpose. Pg. 7. - Section 2 General Planning. Pg. 8. - Section 3 Fish Passage Design Discharge. Pg. 8. - Section 4 Culvert Guidelines. Pg. 11. - Section 5 Permit Application Procedures. Pg. 17. Section 1. Background and Purpose Most water bodies in Alaska contain one or more species of resident or anadromous fish. Fish migrations in these water bodies involve completing one or more cycles of upstream and downstream movements. Fish migrations may occur during all or just part of the year depending on the fish species, life stage, its location, and the type of migration. Fish migrate to spawn, to feed, and to seek refuge from predators or adverse environmental conditions, such as the complete winter freeze-up of a stream, slough, or pond. To maintain viable and healthy fish populations, all life stages of fish must be able to freely migrate up and down these water bodies. Mature adult fish must be able to reach spawning grounds with minimal delay, especially anadromous fish species. Since anadromous fish species typically cease feeding when they enter freshwaters to spawn, migration delays at culverts can seriously deplete stored energy reserves and impact reproductive success. For juvenile fish, delays in reaching feeding areas, over-wintering habitat, or predator relief areas may affect survival. No data exist that define how much delay is too much. Some of the most productive rearing habitats are in tributaries of major rivers - the very locations most culverts are installed. Inadequately sized and constructed culverts at these locations can significantly reduce fish access to the watershed, potentially reducing the amount of habitat and the number of fish produced. Partial barriers to fish passage may block segments of the fish population. The cumulative impacts of structures that block or impede fish passage to spawning and rearing habitats can threaten populations on a watershed level. Conversely, properly designed culvert and associated in-stream work may mitigate naturally occurring barriers and augment populations of fish by making more habitat available. Exhibit A describes the procedures, criteria and guidelines that will be used by ADF&G and ADOT&PF for permitting culvert related work in fish-bearing waters. The guidelines are adopted under the FY01 MOA between ADF&G and ADOT&PF. Users of these guidelines are encouraged to read the MOA and enabling statutes and regulations. The guidelines represent the best available methodology at this time for Alaska. However, some of the fish passage principals and guidelines are based on limited	Comment Number: 71 (continued) research and field observations. Others are extrapolations from different fish species studies. Ongoing research is providing new tools and insight into fish passage design. Future changes to the culvert guidelines are anticipated as new information becomes available. Section 2. General Planning Fish passage structures can have significant bearing on project costs and on the significance of the environmental impacts of a transportation project. Many fish passage problems associated with road crossings of streams can be avoided by considering hydraulic and environmental factors as early as possible in project development. Guidelines for siting culverts and alignment criteria are discussed in the Alaska Highway Drainage Manual and the Pre-Construction Manual. In addition to engineering considerations, siting considerations can include the location of spawning habitat, location of drainage divides or proximity to natural slope breaks, stream widths versus floodplain widths, icing problems, future access needs, vehicle design speed and vehicle sight distance. Section 3. Fish Passage Design Discharge • ADOT&PF's Regional Hydraulic Engineer is responsible for developing the hydrologic estimates for the fish passage design flow. For ungaged watersheds, ADF&G biologists or others may have local site knowledge that would assist ADOT&PF in making this determination. • ADF&G Habitat and Restoration Division is responsible for identifying the design fish species, size and the time of year fish passage is required. Current formulas and models for estimating flood flows are based on statistical analysis of rainfall, runoff records, and/or other basin parameters. These estimates are ADOT&PF's best statistical estimate of flood flows and have varying degrees of error. The true value of the flow may be greater or smaller than the predicted value. The expected magnitude of this variation can be determined, if necessary, for some formulas or models as part of the hydrologic design procedure. Federal, state, and municipal policies directing ADOT&PF's hydrologic analysis are outlined in the <i>Alaska Highway Drainage Manual</i> (ADOT&PF 1995). I. Fish Passage Design Flow The interim fish passage design high flow (Q_{fish}) corresponds to the 2-year flood truncated for a two-day duration (Figure A-1). In the future, estimates for fish passage design discharge will account for the specified time of year that the design fish is
Comment Number: 71 (continued)	ADF&G/ADOT&PF Fish Pass MOA 8 08/03/01
Comment Number: 71 (continued)	ADF&G/ADOT&PF Fish Pass MOA 7 08/03/01

Comment Number: 71 (continued)

migrating upstream. Multiple design discharges may be needed if different fish species of concern migrate upstream at different times of the year. ADF&G Habitat and Restoration Division staff should be consulted to verify the appropriate timing windows for fish passage.

A. Mainland Alaska (excluding Southeast). The 2-year, two-day duration flood in mainland Alaska generally can be estimated by interpolation using (1) either a Log Pearson Type III analysis (as defined in Water Resources Bulletin 17B, 1981, "Guidelines for Determining Flood Flow Frequencies") or Jones and Fahl's (1994) regional regressions for the Q_2 instantaneous flood, and (2) Ashton and Carlson's (1984) regressions for the Q_2 three-day duration floods. Linearity is assumed. In some cases, interpolation using Ashton and Carlson's 1 and 3 day delay discharges may be appropriate. On a case-by-case basis other methods may be used if it is determined that neither of the above methods is appropriate for the region or the specific basin characteristics.

B. Southeast and Coastal Alaska (Jones and Fahl, 1994, Flood Frequency Area 1). The interim value for the fish passage design discharge is 40% of the instantaneous 2-year flood (Q_2). In southeast and southern coastal Alaska, the Q_2 may be determined using either a Log Pearson Type III analysis or Jones and Fahl's (1994) regional regressions for the Q_2 instantaneous flood. Preliminary flow duration evaluation of limited gaged watershed hydrology records in SE Alaska suggest that the 40% Q_2 fish passage design flow corresponds to a mean daily discharge that is exceeded one to five percent of the time for the record evaluated. The interim fish passage design flow is subject to future revision based on ADOT&PF and ADF&G's evaluation of flow regimes for a variety of channel types and watershed characteristics.

Field-testing in Southeast Alaska uncovered significant variability associated with different methods of estimating the fish passage design flow. Application of regional regressions and Manning's equation produced higher discharge estimates relative to stream gaging and unit discharge/area estimates. This variability has the potential to incorrectly identify culverts as problems that actually do pass fish at design flows. The following specific factors affecting this variability should be recognized (Gubernick and Levesque, July 1999):

1. Use of the USGS regression equations to extrapolate for watersheds less than 1.35 square miles should be used with care. Many culvert crossings in Southeast Alaska have watershed areas much smaller than this, requiring extrapolation outside the regression equations' original data set.
2. Characteristics of small basins are extremely difficult to determine due to limitations associated with aerial photography, topographic maps, and forested terrain.
3. Estimation of Manning's "n" is often understated. Channels in mountainous-forested terrain are considerably rougher due to woody debris, irregular channel

ADF&G/ADOT&PF Fish Pass MOA

9

08/03/01

Comment Number: 71 (continued)

- sections, and water depth to grain (substrate) size (small and shallow channels versus large and deep).
- Wetted perimeter may be under-estimated due to (3) above.
- Over-estimate of design discharge may result from the redundant conservatism built into current methods for flow estimation.
- Tail-water depth estimation can be difficult because the estimate must be made in areas of non-uniform flow.

Note: The Q_2 , two-day duration flood is the interim fish passage design flow. At present, it applies to all fish species, anadromous and resident alike, juvenile and adult migrants. This standard probably overestimates fish passage design discharges for juvenile salmon; however, it will remain the standard until additional hydraulic and biological studies are completed. If the fish passage discharge estimate based on these methods is unreasonably high, a site-specific hydrologic analysis may be necessary.

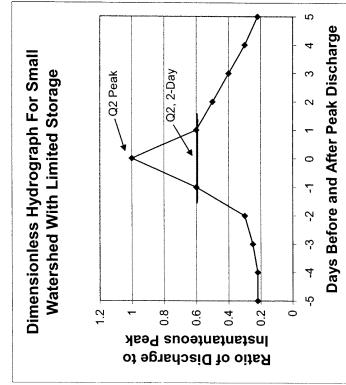


Figure A-1. Median dimensionless hydrograph depicting a two-day duration discharge.
II. Low Flow Evaluation

A low flow design discharge has not been specified. Many streams used by fish are ephemeral or may cease flowing during drought conditions. A written assessment should be prepared evaluating the low flow characteristics during the time of year passage is required.

ADF&G/ADOT&PF Fish Pass MOA

10

08/03/01

Comment Number: 71 (continued)

Water depths during low flow fish passage periods should be concentrated within the culvert barrel to maintain a minimum flow depth that is two and one half times the height of the design fish's caudal (tail) fin (Figure A-2). Interior Alaska Arctic grayling typically have caudal fin heights about 32% of the fish's fork length (McLean, 2006). Thus, a 240-mm Arctic grayling has a caudal fin height of about 77 mm and requires a minimum flow depth of about 192 mm (7.6 inches). Using a similar percentage for juvenile salmonids, a 60-mm coho salmon juvenile requires a minimum flow depth of about 48 mm (1.9 inches).

These minimum flow depths are necessary because fish forced to swim near the water surface or only partially submerged generate surface waves that deplete energy that would otherwise be available to the fish to propel itself through a culvert. These wave-generated forces can consume as much as 2-1/3 times as much energy as the energy required to swim against the same velocity (profile drag) in water depths greater than the minimums (Behlke, 1998, personal communication). Wave induced forces are generally not as significant for adult fish (as a result of their significantly greater power/energy capabilities) and are insignificant for juvenile fish if the submergence depth is more than two times the caudal fin height (measured from the water surface to the midline of the fish (Behlke, 1998). Assuming that the caudal fin is symmetrical (generally true for Alaskan freshwater fish species), the minimum water depth necessary to minimize wave-induced swimming forces is two and one half times the height of the caudal fin.

Note: If resting areas are available within the culvert barrel, the additional wave induced forces may pose less of a barrier to fish.

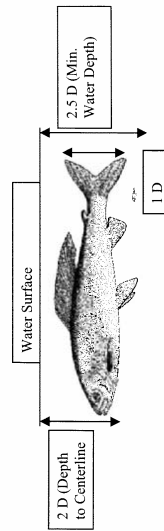


Figure A-2. Minimum water depths for fish passage (D = height of caudal fin).

Section 4. Culvert Guidelines

Culverts in fish-bearing streams will be designed and permitted using one of the following design approaches. The design approaches are presented in a tiered manner, which encourages use of the stream simulation approach by (1) decreasing the level of detailed engineering required for fish passage consideration and (2) increasing assurances that the structure will receive ADF&G authorization. It is the engineer's responsibility to determine which design method best fulfills all facets of design, including site conditions,

Comment Number: 71 (continued)

alignment, and project schedule. Tier 1 design most closely replicates natural stream conditions. Each succeeding tier further deviates from natural stream conditions and consequently will require progressively more detailed engineering and analysis to ensure that fish passage is provided.

Tier 1. Stream Simulation Design. (New or replacement installations, particularly in narrow valleys with entrenched flood flows. The stream simulation method is applicable in gradients up to six percent. Additional hydraulic analysis is needed for gradients over six percent).

Stream simulation, as the name suggests, is a culvert design technique that attempts to replicate natural stream channel conditions within a culvert. Sediment transport, flood and debris conveyance, and fish passage are designed to function as they would in a natural channel. The design methodology is a derivative of Canadian research (McKinnon and Hyntka, 1979, 1985), Washington State's fish passage culvert criteria (Bates, et al., 1999), and The Oregon Plan's Road/Stream Crossing Restoration Guide (Robison, 1998 and Robison, et al., 1999).

Culverts designed using the stream simulation method are sized larger than culverts sized hydraulically for floodwater conveyance alone. The culvert width at the Ordinary High Water (OHW) stage waterline must be greater than the $0.9 \times \text{OHW}$ width. The culvert grade should approximate the channel slope, but in no instance should it deviate more than 1% from the natural grade (e.g. a 4% channel with an installed 3% culvert). In stream channels with slopes less than 1% (typically palustrine, estuarine, and flood plain channels), culverts may be installed at slopes less than 0.5% with culvert widths greater than $0.75 \times \text{OHW}$.

Within the culvert barrel, substrate material should remain dynamically stable at all flood discharges up to and including a fifty-year flood. This requires either placement of oversized material that can resist predicted critical shear forces or substrate retention baffles that allow bed load to continuously recruit within the culvert barrel. If gravel retention baffles are used, they should have a weir height of 0.5 times the culvert invert burial depth. The need for outlet aprons and inlet protection should be investigated and designed as necessary. If needed, outlet aprons should extend about 3 culvert widths downstream or as required based on site conditions.

Invert burial depths for Tier 1 circular culverts should be at least 40% of the culvert diameter. Invert burial depths for arch pipes should be at least 20% of the rise.

If the above criteria are followed, it is assumed that fish passage is met. Further hydraulic analysis to support fish passage is not required. Without question, the initial cost for installing oversized culverts under the stream simulation approach will be higher than the cost of pipes sized strictly for hydraulic capacity. However, higher initial costs may be offset by lower life cycle costs and a simpler, more streamlined permitting process.

ADF&G/ADOT&PF Fish Pass MOA

11

08/03/01

ADF&G/ADOT&PF Fish Pass MOA

12

08/03/01

Comment Number: 71 (continued)

Tier 2. FISHPASS Program Design. (For retrofit of existing installations or new installations where Tier 1 is not preferred. This method requires hydrologic and hydraulic analysis and evaluation of biological parameters based on field documented power / energy capabilities of some Alaskan fish species.)

Culverts are designed using a combination of traditional hydraulic engineering methods (e.g., HY-8) and the Alaska Interagency Fish Passage Task Force's 1991 "FISHPASS" computer modeling program. The fish passage computer modeling program and background documentation are published in:

Behlke, C., Kane D., McLellan R., and Travis M. 1991. Fundamentals of culvert design for passage of weak-swimming fish. Alaska Dept. Trans. & Pub. Facit. Rpt. No. FHWA-AK-RD-90-10. Fairbanks, AK.

Subsequent updates of the FISHPASS computer-modeling program are expected to refine the equations for additional fish species and to enhance the modeling capabilities of the program. Current collaborative efforts include merging the FISHPASS program with the U.S. Forest Service's FISHXING computer modeling program. Adoption of this computer software or any other alternative becomes effective under the MOA only upon joint approval of ADOT&PF and ADF&G.

Culverts designed using the FISHPASS computer program must be evaluated for the design discharge for the fish, the design flood hydraulic capacity and effects on the upstream and downstream channel. Appropriate treatments will be investigated if needed to address outlet perching or upstream effects (e.g. headcutting if slope not matched).

Tier 3. Hydraulic Engineering Design. (For use where site-specific conditions preclude use of Tier 1 or Tier 2.)

Professionally recognized hydraulic engineering methods will be used to ensure appropriate fish passage characteristics in the culvert. This type of design requires more detailed evaluation of hydrologic, hydraulic and biological parameters. ADF&G's permit review is proportionately more complex.

Table A-1. Summary of Fish Passage Culvert Design Options

DESIGN OPTION	BENEFITS / LIMITATIONS
Stream Simulation (Tier 1)	- Minimal design requirements, simplified permitting. - New and replacement culverts. - Passage provides for all fish species and life stages. - Culvert slope generally equals slope of natural

ADF&G/ADOT&PF Fish Pass MOA

13

08/03/01

Comment Number: 71 (continued)

	channel	- Culvert gradients are less than 6%, or if >6%, they are supported by hydraulic analysis of the stability of streambed material within the culvert. - Stream widths are relatively narrow and incised (less than 20 feet at OHW).
Fish Pass / Fish Crossing Model (Tier 2)	- Moderate design and permit review process. - Use for culverts narrower than those required for Tier 1. - Use for new, replacement and retrofit culverts when gradient and virtual mass forces are significant and must be considered at culvert inlet and outlet. - Low to moderate gradient slopes without baffles. - Baffled culverts up to 10% slope. - Target fish species identified for passage. - Suitable for any size watershed or length of pipe.	
Other Hydraulic Methods (Tier 3)	- Detailed design and review process. - Must be used for all baffled culverts when installation slope is greater than 10%. - Appropriate for use when installation includes downstream weirs or other tail water control structures. - Use with Tier 1 design to evaluate bed stability when slopes are greater than 6%.	
Applied Research	- Experimental structures. Joint ADOT&PF/ADF&G decision. - Detailed engineering and permitting requirements. - Must include post-monitoring and remediation guarantees.	

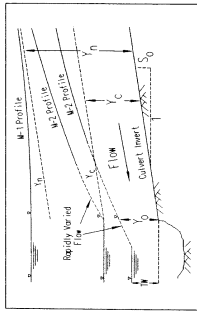
Technical Notes

- A. Except as otherwise noted for culverts designed using the Tier 1 – Stream Simulation approach, at least one-fifth of the diameter or 18 inches, whichever is less, of each circular culvert or at least 12 inches of the height of each elliptical or arch type culvert should be buried, at both the inlet and outlet of the culvert,

ADF&G/ADOT&PF Fish Pass MOA

14

08/03/01

Comment Number: 71 (continued) below the natural channel thalweg. This guideline is not applicable to bottomless culverts. <i>(NOTE: This is a guideline that may not be able to be met in all cases. The FISHPASS-ESE program does not require depression of the culvert invert. However, routinely depressing the culvert invert increases barrel roughness. Increases the tail water depth, and provides greater assurance that, over time, downstream channel degradation will not result in a perched culvert.)</i> B. Generally speaking, culvert boundary roughness is a necessity for successful fish passage. Corrugated structural steel plate pipes with corrugations 6 inch by 2 inch or 9 inch by 2.5 inch are recommended. Boundary zone velocities in these rougher culverts typically range between 10–40% of the average water velocity (Q/A). In contrast, boundary zone velocities in culverts with shallower corrugations (3 inch by 1 inch) are reduced only about 20% over average water velocity (Q/A). Spiral (helical) and smooth-wall culverts are particularly discouraged, except in low gradient drainages (<0.5%) due to their low Manning's n values. Turbulence in the fish-swimming zone near culvert walls with shallow depth corrugations has been observed to negatively impact passage of juvenile salmonids. Larger depth corrugations also create turbulence; however, field observations suggest the width of the low velocity zone immediately adjacent to the culvert wall is adequate to provide a free passage zone outside the negative influence of turbulence. For design purposes, circular culverts with 2 inch or greater depth corrugations are conservatively assumed to have boundary water velocities 0.4 Q/A. If a mild water surface profile (M-1 or M-2) exists in the culvert, water velocities near the outlet are assumed to be 0.8 Q/A, gradually decreasing to 0.4 Q/A in the culvert barrel upstream from the outlet acceleration zone (Figure A-3).	Comment Number: 71 (continued) surface profiles occur because normal depth is greater than critical depth. C. In general, culverts in fish-bearing waters should be designed for outlet control for discharges ranging up to the design fish passage flow. Field analysis of many culverts shows that most of an Arctic grayling's energy is expended in the white muscle (anaerobic) mode in passing through the culvert outlet. Because of this, culvert tail water depths generally need to be high enough so the outlet flow is sub-critical (Behlke et. al, 1991). This normally precludes inlet control in culverts at the design fish passage flows. In practice, many culverts can be designed to function under outlet control at the fish passage design flow and under inlet control at the fifty-year or other maximum design flood. Data have not yet been gathered to evaluate whether this also holds true for stronger-swimming fish. Stronger-swimming fish species such as adult chinook salmon, coho salmon, sockeye salmon, and steelhead may be capable of sustaining burst (white muscle mode) speed for longer time periods (perhaps as long as 7 to 10 seconds) and reaches of the culvert than Arctic grayling and other weak-swimming fish species (Bell, 1986). Juvenile coho have been observed moving past a hydraulic jump within the barrel of a culvert and again past the supercritical flow at the inlet (Kane, 1999). D. Maximum culvert slopes have not been specified. However, modified (stream simulation, buried invert) or baffled culverts generally are necessary to successfully pass fish at gradients in excess of 3.0 %. E. If culvert baffles are used, the recommended weir baffle spacing is 0.6 times the culvert diameter with a maximum baffle height of 0.15 times culvert diameter. Weirs should be sharp-crested. Broad crested weirs create a longer, high velocity, distance that fish have to negotiate or leap. Individual weirs may need to be notched, slotted, offset, or slanted to concentrate low flow. For juvenile salmonids, Powers (1993) recommends that the maximum hydraulic drop at each weir should not exceed 21.3 cm (8.4 inches) or 30.5 cm (12 inches) for 45 to 65 mm and 80 to 100 mm fish, respectively. Powers (1993) further recommends that the hydraulic drop at the entrance and exit to the baffled culvert should not exceed 4 cm (1.6 inches) or 10 cm (4 inches) for 45 to 65 mm and 80 to 100 mm fish, respectively. Finally, Powers (1993) suggests that the baffled culvert inlet should be submerged 15 cm (6 inches) or more below the pond water surface. (Note: compliance with the invert burial guideline (Note B) meets this standard.) In contrast, the U.S. Forest Service interim guidelines for fish passage in the Tongass National Forest suggest use of a more conservative 7.6 cm (3 inch) maximum drop between weir baffles. Until additional field analysis is completed,
Comment Number: 71 (continued)	Figure A-3. Water surface profiles in the outlet zone. Y_m, Y_o, and Y_c are hydraulic normal, outlet and critical depths, respectively. M- 

Comment Number: 71 (continued) the designed drop between weir baffles should range somewhere between the U.S. Forest Service Tongass and Powers (1993) recommendations, with designers encouraged to "err" on the conservative side until further clarification is obtained. The above baffle criteria are general recommendations. A hydraulic engineer should check baffle designs for adequacy. F. Although rapid or fluttering lighting transitions may evoke negative response, most field research indicates that lighting per se within culverts is not a significant factor affecting fish passage (Bell, 1986). G. The erodibility of channel-bed material at culvert outlets should be evaluated. Appropriate treatments such as a rip-rap apron, energy dissipation pool, or other suitable materials may be necessary to avoid outlet perching. Minimum tail water elevations necessary to achieve fish passage or to maintain minimum culvert water depths should be maintained at all discharges up to and including the maximum fish passage design flow. Impact-type energy dissipation structures generally are not conducive to fish passage and should not be used unless they can be designed to provide fish passage. H. Whenever possible, culverts should be aligned in a direction as nearly parallel to the direction of water flow as possible. If the culvert is significantly skewed, hydraulic analysis of the inlet hydraulic conditions and barrel boundary layer velocity distributions may need to be conducted to ensure that fish passage conditions are provided. I. To minimize upstream and downstream channel changes (e.g., head cutting), and the need for additional treatments, culverts generally should be aligned with the gradient of the natural stream. (<i>See specific limitations for culverts designed using the Tier 1 – Stream Simulation approach.</i>) J. The need for normally dry flood relief culverts or roadway sags should be evaluated with regard to culvert bed stability and scour issues at flood flows. These structures would normally be located away from the stream channel but within the flood plain. For example, a site with a narrow deep channel and a wide floodplain may be a candidate for this type of treatment. K. Culverts should be installed during low flow periods whenever possible. Where significant flow is present, generally acceptable techniques to isolate the construction site from stream flow include but are not limited to channel bypasses, temporary flumes, sheet pile or sandbag walls, water filled cofferdams, or pumping the stream flow around the work site. L. Installation of trash racks or debris interceptors should be avoided unless they can be designed and maintained to have minimum effect on culvert inlet hydraulics.	Comment Number: 71 (continued) M. These fish passage design criteria augment, but do not replace or supersede, ADF&G's standard design criteria presented in the <i>Alaska Highway Drainage Manual</i> (ADOT&PF, 1995) or the American Association of State Highway and Transportation Officials (AASHTO) guidelines. Both hydraulic design requirements and fish passage criteria must be satisfied. N. Potential changes in watershed land use that could increase the flood discharge flows within the design life of the structure should be considered when initially sizing a culvert. Section 5. Permit Application Procedures Application for an ADF&G Fish Habitat Permit for a culvert structure will describe the proposed culvert installation, time periods requested for in-water activity, and for Tier 2 and Tier 3 designs (See Section 4) will include a fish passage analysis for the fish design discharge (Q_{95}) and an evaluation of low flow fish passage characteristics. A standard application form is not required for ADOT&PF installations. However, a written description from ADOT&PF is required and should contain the information identified in Exhibit C. The amount of information required is directly linked to the specific design tier used. Tier 1 designs require less site-specific information than Tier 2 or 3. There will be pre-application coordination between ADF&G and ADOT&PF staff prior to a formal application being submitted. It is easier and less costly for ADOT&PF to revise and modify plans while they are still in preliminary design. Optimally, all disagreements should be resolved before a permit application is submitted to ADF&G.
ADF&G/ADOT&PF Fish Pass MOA 17 08/03/01	ADF&G/ADOT&PF Fish Pass MOA 18 08/03/01

Comment Number: 71 (continued) These additional forces are not included in calculation of the interim power/energy equivalents. Because there is a substantial size difference between adult Arctic grayling and juvenile salmonids, using an equivalent length in FISHPASS.EXE will result in excessive calculation of gradient forces for the much smaller juvenile salmonids. This will over-estimate the actual power / energy required. Hand calculation of forces using actual design fish size and not the equivalent grayling size may be necessary. Until comparative field data become available, the equivalents should be used with some caution. A combination of best professional judgement, FISHPASS.EXE, and other available hydraulic models should be used in these situations. FOR EXAMPLE, an acceptable evaluation of juvenile coho salmon performance may be obtained for low gradient installation using a fish length 1.57 times the design juvenile coho salmon length (e.g., input 96 mm in the Fish Length field if the design coho is 60 mm). This adjustment reflects the greater power and energy capabilities of coho salmon in the red muscle swimming mode (sustained) for a given length relative to the power and energy capabilities of Arctic grayling. The equivalents are based on the average differential swimming performance of cold-water fish species presented in Hunter and Mayor, 1986 (Tables B-2). Performance values are used only if the reported water temperatures during the test were equivalent to those typically found in Alaskan waters. The interim equivalent values do not include an adjustment for the scale effects of fish length on power capability versus power required (e.g., capability increases by Length^{2.34} whereas power required only increases by Length^{1.63}). The interim values are set at the lowest differential value where considerable variability exists between studies. Field observation suggests that the modeling inputs for Arctic grayling may be similar for other adult Alaskan fish species (i.e., relative transit times under red and white muscle modes). Data are not available to confirm their applicability to juvenile salmonids. Although juvenile salmonids have been observed swimming in the same general area adjacent to the culvert wall as adult Arctic grayling, they do so much closer to the culvert wall, where the relative velocities are considerably less than the value used in FISHPASS. Hence, while FISHPASS can be used to model the performance of juvenile salmonids, it should be recognized that the modeled performance is probably a conservative estimate. As additional juvenile fish swimming performance and culvert wall boundary water velocity data become available, these assumptions will be revised and updated. In some instances it is possible to use the FISHPASS.EXE program to evaluate culverts with non-circular shapes by approximating the actual wetted section with an equivalent partial circular section. Figure B-1 illustrates this concept with an elliptical culvert. Flood discharge capacity (Q_{50}) should be evaluated using other methods that account for the actual culvert section.	Comment Number: 71 (continued) EXHIBIT B FISHPASS Culvert Fish Passage Program And Technical Advisory FISHPASS.EXE Computer Program The Tier 2 evaluation of culverts for fish passage is based on a microcomputer-supported analysis of the combined profile drag (velocity), virtual mass forces, and non-Archimedes buoyant (gradient) forces acting on a swimming fish in a culvert. The component forces are described in the "Fundamentals of Culvert Design for Passage of Weak Swimming Fish" (Bohlke et al., 1991). This design is not based on acceptable cross-section culvert velocities. Rather, the design method evaluates the component hydraulic forces within a culvert against a fish's available power and energy capabilities. The analysis further differentiates between the red muscle (aerobic) propulsive mode typically used by fish within the culvert barrel and the white muscle (anaerobic) propulsive mode used under most flow regimes at the culvert inlet and outlet. Power and energy evaluations are particularly useful in steep culverts, perched culverts and culverts with significant inlet contraction where virtual mass and gradient forces become significant relative to profile drag (velocity). ADF&G, in cooperation with the University of Alaska Fairbanks, currently is funded by ADOT&PF to collect fish swimming performance data for juvenile chinook, coho, Dolly Varden, and cutthroat trout. This information will be used to modify the power and energy equations for non-grayling fish species and will be included in a combined FISHPASS.EXE / Fish Xing program currently under development by the U.S. Forest Service (USFS), Six Rivers National Forest Watershed Interactions Team.¹ A future version of FishXing will include computer simulations of other culvert types, including box, elliptical, squash, and bottomless arches.² ADOT&PF and ADF&G will use the FISHPASS.EXE program and the power/energy equivalents specified in Table B-1 as the primary tool for determining if a proposed circular culvert designed using Tier 2 procedures provides acceptable fish passage. The power/energy equivalents are derived from velocity / time-decay curves prepared by Hunter and Mayor, 1986, and are benchmarked to the observed performance of adult Arctic grayling. Because the power/energy equivalents are based strictly on a comparison of the relative swimming velocities (profile drag) of various fish species, the power/energy equivalents should be used with caution for hydraulic gradients greater than 3%. Culverts with slopes greater than 3% or with significant drops in the water surface elevation (e.g., steep inlet drawdown greater than a 3%) at any point within the culvert will have significant virtual mass and gradient forces in addition to profile drag. ¹ Under sponsorship from the U.S. Forest Service T&D Program, U.S. Forest Service Rocky Mountain Research Station, Federal Highways Administration, U.S. Forest Service Soil, Water and Air T&D Program, Humboldt State University and Humboldt State University Foundation, and the National Marine Fisheries Service. ² A future release of FishXing (Ver. 3) is expected in the near future and will include a separate module using FishPass equations to evaluate fish power/energy requirements.
--	---

Comment Number: 71 (continued)

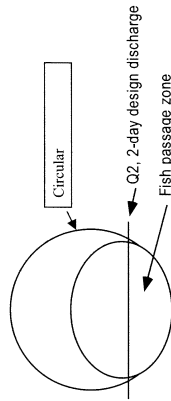


Figure B-1. Circular approximation of an elliptical culvert within the fish passage zone at the design discharge. The equivalent circular culvert diameter is used in the FISHPASS-EXE program.

ADF&G/ADOT&PF Fish Pass MOA 21

08/03/01

Comment Number: 71 (continued)

Table B-1. Equivalent Conversions To Be Used in FISHPASS (< 3% slope) To Evaluate The Performance Of Other Fish Species.¹ (Based on Hunter and Mayor, 1986, velocity-time decay equations.)

Fish Species	Design Length	Equivalent Length To Input In FISHPASS	Conversion Factor
Upstream Migrant Adults			
Arctic Grayling	240 mm	240 mm	1.00
Long-nose Suckers	350 mm	225 mm	0.64
Northern Pike	450 mm	107 mm	0.24
Sheefish	450 mm	175 mm	0.39
Humpback Whitefish	120 mm	120 mm	0.99
Dolly Varden (Arctic char)	450 mm	350 mm	0.78
Steelhead / Rainbow	600 mm	1200 mm	3.03
(No sustained velocity-time decay curves are available for adult steelhead. The 60-200 mm equation for rainbow trout is applied. This is a conservative estimate. Available power goes up by Length ^{-2.54} , whereas required power goes up by Length ^{-1.8} .)			
Cutthroat Trout	250 mm	No velocity-time decay curves available; assume equivalent to Arctic grayling (Bell, 1986).	
Chinook Salmon			
Sockeye Salmon	600 mm	No velocity-time decay curves available for this size class; assume equivalent to Arctic grayling 1.57 times as long.	
Coho Salmon	600 mm		
Pink Salmon	400 mm	503	1.26
Chum Salmon	500 mm	No velocity-time decay curves available; assume equivalent to pink salmon.	
Upstream Migrant Fry/Fingerlings			
Chinook Salmon	60 mm	No velocity-time decay curves available; assume equivalent to coho salmon (Bell, 1986).	
Coho Salmon	60 mm	96 mm	1.60
Sockeye Salmon	40 mm	61 mm	1.53
Steelhead / Rainbow	60 mm	182 mm	3.03
Dolly Varden	70 mm	85 mm	1.21
Cutthroat Trout	100 mm	assume equivalent to Dolly Varden until Alaskan field data is evaluated	

¹ To use the equivalent conversion factors, multiply the length of the design fish by the conversion factor and input that product in "Length Field" of the FISHPASS-EXE Program.

Based on Hunter et al., 1986, velocity-time decay equations. The conversion factors ONLY consider profile drag (velocity).

ADF&G/ADOT&PF Fish Pass MOA 22

08/03/01

Comment Number: 71 (continued)

Table B-2 (Continued). Swimming performance of Alaskan fish species (from Hunter and Mayor, 1986).

Species	Length Range (mm)	Water Temp. (C)	Burst (m/s)	Sustained (m/s)	Source of Field Data
Rainbow Trout	610 to 813	7 to 19	12.3* $\pm$ 0.52* $\pm$ 0.51	3.28* $\pm$ 0.37* $\pm$ 0.1	Waver (1963) and Beamish (1978)
Rainbow Trout	60 to 200	10		3.74* $\pm$ 0.606* $\pm$ 0.13	Welch and Cox (1970)
Arctic Char	70 to 420	9 to 10		2.69* $\pm$ 0.606* $\pm$ 0.08	Welch (1979) and Beamish (1980)
Arctic Char	70 to 420	9 to 10		1.99* $\pm$ 0.43* $\pm$ 0.1	Beamish (1980)
Brook Trout	40 to 270	15		2.71* $\pm$ 0.52* $\pm$ 0.1	Beamish (1978) and Peterson (1974)
Sheefish	70 to 800	12 to 20		1.29* $\pm$ 0.175* $\pm$ 0.1	Jones et al. (1973)
Arctic Grayling	60 to 400	12 to 20		1.67* $\pm$ 0.193* $\pm$ 0.1	Jones et al. (1973)
Arctic Grayling		1 to 7.1	7.2* $\pm$ 0.799* $\pm$ 0.05	4.348* $\pm$ 0.797* $\pm$ 0.087	Behlke et al. (1988 and 1989)
Arctic Grayling		1 to 7.1			Behlke et al. (1988 and 1989)
Arctic Grayling		1 to 7.1	14.18* $\pm$ 0.854* $\pm$ 0.1		Behlke et al. (1988 and 1989) using methodology

L = total length of the fish in meters (not fork length)
t = duration of swimming effort in seconds
Note: Substitute Arctic char for Dolly Varden char.

Comment Number: 71 (continued)

Table B-2. Swimming performance of Alaskan fish species (from Hunter and Mayor, 1986).

Species	Length Range (mm)	Water Temp. (C)	Burst (m/s)	Sustained (m/s)	Source of Field Data
Northern Pike	100 to 800	12 to 13	1.17* $\pm$ 0.55* $\pm$ 0.1	1.73* $\pm$ 0.55* $\pm$ 0.1	Jones et al. (1973)
Longnose Sucker	30 to 700	7 to 20	2.39* $\pm$ 0.529* $\pm$ 0.1	1.73* $\pm$ 0.55* $\pm$ 0.1	Jones et al. (1973)
Whitefish	60 to 600				Jones et al. (1973)
Broad Whitefish	50 to 400	12 to 13	1.46* $\pm$ 0.45* $\pm$ 0.1	1.73* $\pm$ 0.55* $\pm$ 0.1	Jones et al. (1973)
Burbot	100 to 700	7 to 10	2.23* $\pm$ 0.07* $\pm$ 0.26	4.08* $\pm$ 0.55* $\pm$ 0.08	Brett (1982)
Pink Salmon	494 to 607	20			Jones et al. (1973)
Coho Salmon	356 to 510	10 to 19	13.3* $\pm$ 0.52* $\pm$ 0.65	3.02* $\pm$ 0.52* $\pm$ 0.1	Waver (1963) and Beamish (1978)
Coho Salmon	40 to 178	8 to 12			Glover and McInerney (1977); Davis et al. (1963); Beamish (1978); and Dahlberg et al. (1968)
Sockeye Salmon	N/A	2		3.31* $\pm$ 0.6294* $\pm$ 0.1	Brett and Glass (1973)
Sockeye Salmon	N/A	5		3.63* $\pm$ 0.6243* $\pm$ 0.1	Brett and Glass (1973)
Sockeye Salmon	N/A	10		4.46* $\pm$ 0.6294* $\pm$ 0.1	Brett and Glass (1973)
Sockeye Salmon	N/A	18 to 20		4.99* $\pm$ 0.6293* $\pm$ 0.07	Brett and Glass (1973) and Brett (1982)
Sockeye Salmon	N/A	15 to 18		5.21* $\pm$ 0.06345* $\pm$ 0.09	Brett and Glass (1973) and Brett (1982)
Sockeye Salmon	77 to 539	15		4.42* $\pm$ 0.55* $\pm$ 0.1	Brett (1965a)
Sockeye Salmon	126 to 611	10 to 15		5.47* $\pm$ 0.89* $\pm$ 0.07	Brett (1964, 1967, and 1982)
Chinook Salmon	508 to 965	19			Waver (1963)
Rainbow Trout	103 to 280	N/A			Bainbridge (1960)
Rainbow Trout	103 to 813	7 to 19	12.8* $\pm$ 1.07* $\pm$ 0.48		Beamish (1978)

Comment Number: 71 (continued) EXHIBIT C ADF&G AS 16.05.840 and 16.05.870 Permit Application Information Requirements For Culvert Installations in Fish Streams The following permit application information requirements are adopted under the 2001 Memorandum of Agreement (MOA) between ADF&G and ADOT&PF. The information requirements vary depending on which design tier (Exhibit A of the MOA) is used by ADOT&PF. Tier I Permit: • Name of waterbody • Project location, construction timing and plan • ADF&G Anadromous Catalog Number (if applicable) • Ordinary High Water channel width • Channel slope • Culvert type and dimensions Tier II Permit: • Name of waterbody • Project location, construction timing and plan • ADF&G Anadromous Catalog Number (if applicable) • Fish species, size, and time of year (supplied by ADF&G) • Fish passage design discharge (Q_{fpa}) • Stream channel substrate size (or alternately the culvert invert substrate size if an alternative backfill is specified) • Ordinary High Water channel width • Channel slope • Culvert type and dimensions • Culvert invert burial depth (if buried) Tier III Permit: • Information required for Tier 2 Tier I Permit: • Culvert invert burial depth • Culvert invert slope • Fish passage design discharge (Q_{fpa}) • Assessment/analysis of culvert substrate stability • Assessment of need for normally dry lateral flood relief. Tier II Permit: • Culvert invert slope • Corrugation width and depth • Low flow analysis (discharge and depth of flow) • Description of bank armoring or inlet and outlet scour protection (if used) • Tailwater elevation at Qfish • Jumping height (if any) if tailwater control is required • Baffle details if used (type, spacing, height, top angle, slots, etc.) • Assessment of need for normally dry lateral flood relief. Tier III Permit: • Summary of analysis supporting fish passage	Comment Number: 71 (continued) (Intentionally Blank)
---	---

08/03/01

26

Fish Pass MOA wsign.doc

08/03/01

25

Fish Pass MOA wsign.doc

Comment Number: 71 (continued)	Comment Number: 71 (continued)
Grade control structure is a structure placed in a stream channel (generally with its central axis perpendicular to flow) to control bed elevation. Grade control structures can be used to control tailwater elevation and to prevent head-cutting. Head-cutting is channel bottom erosion moving upstream through a basin and may indicate that a readjustment of the stream's flow regime (slope, hydraulic control, and/or sediment load characteristics) is taking place. Hydraulic jump is a hydraulic phenomenon, in open channel flow, where supercritical flow changes to sub-critical flow. This can result in an abrupt rise in the water surface. Invert is the flow line of the culvert (inside bottom). Manning's n is an empirical coefficient for computing stream bottom roughness used in determining water velocity in stream discharge calculations. Mean annual flood discharge is the arithmetic mean of all the annual peak floods at a given site and should not be confused with the flood having a recurrence interval of one year. The mean annual flood has a recurrence interval of 2.33-years according to the theory of extreme values as applied to floods by Gumbel (1945). Migration is the deliberate movement of fish from one habitat to another. Includes the downstream movement of young anadromous fish from streams to sea, the upstream movement of adult anadromous fish from sea to freshwater spawning streams; the movement (upstream and downstream) of juvenile anadromous fish to rearing and over-winter habitats; and the movement (upstream and downstream) of resident fish to spawning, rearing and over-wintering habitats. Normal depth of flow is the depth at which uniform flow will occur in an open channel, and is determined where $Q = A R^{2/3} S_b^{1/2} / n$ (Q = discharge (m³/sec); A = cross sectional area of water flow; R = hydraulic radius; S_b = slope of the energy grade line, n = Manning's roughness coefficient), and requires a trial and error solution. Conversion of the equation to English units (cubic feet per second) multiplies the right side of the equation by a factor of 1.486. Sub-critical flow occurs when the normal depth is greater than the critical depth. Super-critical flow occurs when the normal depth is less than the critical depth. Swimming speeds of fish vary from essentially zero to over six meters per second, depending upon species, size, and activity. Three categories of performance are generally recognized: Cruising speed is the speed a fish can maintain for an extended period of travel without fatigue. Metabolic activity in this mode is strictly aerobic and utilizes only red muscle tissues.	EXHIBIT D Definitions 840-Stream defines fish passage for resident fish streams (AS 16.05.840); is also applied to uncataloged anadromous fish streams. 870-Stream is a cataloged anadromous fish stream specified under AS 16.05.870(a) and adopted by reference under 5 AAC 95.010(a). Aufeis is an ice feature formed by water overflowing onto a surface such as river ice or gravel deposits, and freezing, with subsequent layers formed by water overflowing onto the ice surface itself and freezing. Bankfull discharge is the discharge corresponding to the stage at which the floodplain of a particular stream reach begins to be flooded. The bankfull discharge is a morphological indicator that is related to the formation, maintenance, and dimensions of a stream channel as it exists under modern climatic conditions. The bankfull discharge, on average, has a flood frequency of approximately 1.5-years on the annual series. However, this frequency can vary widely depending on the particular watershed and stream reach characteristics. Bankfull discharge in one reach of a stream is rarely the same in adjacent reaches. Bed roughness is a measure of the irregularity of streambed materials as they contribute to resistance to flow. Commonly measured in terms of Manning's roughness coefficient. Bedwidth is the distance from the bottom of the left bank to the bottom of the right bank. The distinction between bed and bank are determined by examining channel geometry and the presence/absence of vegetation. Channel is a natural or artificial waterway of perceptible extent that periodically or continuously contains moving water. It has a definite bank and bed that serves to confine the water. Critical depth is the depth at which the specific energy of a given flow rate is at a minimum. For a given discharge and cross-section geometry there is only one critical depth. This occurs roughly where $Q^2 B / g A^3 = 1.0$ (Q = discharge; B = width of water surface across culvert; g = acceleration due to gravity; A = cross-section area of water flow). However, the relationship changes with different cross-sectional shapes and depths of flow. Hydraulic analysis by a knowledgeable engineer can determine this value. Design Flood is the probabilistic estimate of a flood whose magnitude is equaled or exceeded within a given frequency.
Fish Pass MOA wsign.doc 28 08/03/01	Fish Pass MOA wsign.doc 27 08/03/01

Sustained (prolonged) speed is the speed that a fish can maintain for a prolonged period, but which ultimately results in fatigue. Metabolic activity in this mode is mixed anaerobic and aerobic and utilizes some white muscle tissue and possibly red muscle tissues. Burst (darting) speed is the speed a fish can maintain for a very short period, generally 5 to 7 seconds, without gross variation in performance. Burst speed is employed for feeding, escape, and negotiating difficult hydraulic situations, and represents maximum swimming speed. Metabolic activity in this mode is strictly anaerobic and utilizes all of the white muscle tissues. Thalweg is the line connecting the lowest or deepest points along a streambed. Velocity is the time rate of motion; the distance traveled divided by the time required to travel that distance. Mean culvert cross-sectional velocity (V_{QA}) is the discharge divided by the cross-sectional area of the flow in a culvert. Usually termed "average velocity". Mean column culvert velocity is the average velocity measured on an imaginary vertical line at any point within a culvert. A measurement at 60% of the depth, measured from the surface, closely approximates the average velocity for the water column. In water greater than 76 cm in depth, the average of measurements made at 20% and 80% of the depth approximates the mean column velocity. Maximum culvert velocity (V_{max}) is the highest velocity encountered in all cross-sectional profiles in a culvert. V-occupied culvert velocity (V_{w0}) is the water velocity in the locations within a culvert where fish are actually swimming as opposed to a mean cross-sectional velocity or the maximum velocity. Fish swimming velocity (V_{fw}) is the velocity of a swimming fish with respect to the ground. It is the summation of the V-occupied velocity and the forward rate of movement of the fish through the water. (Intentionally Blank)	EXHIBIT E Literature Cited Alaska Department of Transportation and Public Facilities. 1995. Alaska Highway Drainage Manual, First Edition. Juneau, AK. Ashon, W. and Carlson, R. 1984. Determination of seasonal, frequency and durational aspects of stream flow with regard to fish passage through roadway drainage structures. University of Alaska Fairbanks for the Alaska Department of Transportation and Public Facilities. Rpt. No. FHWA-AK-RD-85-06. Bainbridge, R. 1960. Speed and stamina in three fish. J. Exptl. Biol., 37(1):129-153. Bates, Ken. Washington Department of Fish and Wildlife, Olympia, WA. Response to Fishpass List Serve inquiry. July 1, 1998. Bates, K., Barnard, B., Heiner, B., Klavas, P., and Powers, P. 1999. Fish passage design at road culverts - A design manual for fish passage at road crossings. Washington Department of Fish and Wildlife, Habitat and Lands Program. Olympia, WA. Behlke, Chuck. University of Alaska Fairbanks, Fairbanks, AK. Personal communication with Robert McLean, ADF&G. October 1998. Behlke, C., Kane, D., McLean, R.F., and Travis, M. 1991. Fundamentals of Culvert Design for Passage of Weak-Swimming Fish. Alaska Department of Transportation and Public Facilities. Report No. FHWA-AK-RD-90-10. Juneau, AK. Behlke, C., Basketfield, D.L., Gieck, R.E., Kane, D.L., McLean, R.F., and Travis, M.D. 1989. Hydrology, hydraulics and fish passage performance of Arctic grayling at Fish Creek, near Cantwell, Alaska. Alaska Department of Transportation and Public Facilities. Rpt. No. FHWA-AK-89-03. Juneau, AK. Behlke, C., Kane, D.L., McLean, R.F., and Travis, M.T. 1988. Spawning migration of Arctic grayling through Poplar Grove Creek culvert. Alaska Department of Transportation and Public Facilities. Rpt. No. FHWA-AK-88-03. Beamish, F.W.H. 1978. Swimming capacity. In: Fish Physiology. Vol. VII. Locomotion. Hoar, W.S. and Randall, D.J., (eds.). Academic Press, New York. pp. 101-187. Beamish, F.W.H. 1980. Swimming performance and oxygen consumption of the charrs. In: Charrs, Salmonid Fishes of the Genus <i>Salvelinus</i>. Balon, E.K. (ed.). The Hague, The Netherlands. Pp. 739-748.
Sustained (prolonged) speed is the speed that a fish can maintain for a prolonged period, but which ultimately results in fatigue. Metabolic activity in this mode is mixed anaerobic and aerobic and utilizes some white muscle tissue and possibly red muscle tissues. Burst (darting) speed is the speed a fish can maintain for a very short period, generally 5 to 7 seconds, without gross variation in performance. Burst speed is employed for feeding, escape, and negotiating difficult hydraulic situations, and represents maximum swimming speed. Metabolic activity in this mode is strictly anaerobic and utilizes all of the white muscle tissues. Thalweg is the line connecting the lowest or deepest points along a streambed. Velocity is the time rate of motion; the distance traveled divided by the time required to travel that distance. Mean culvert cross-sectional velocity (V_{QA}) is the discharge divided by the cross-sectional area of the flow in a culvert. Usually termed "average velocity". Mean column culvert velocity is the average velocity measured on an imaginary vertical line at any point within a culvert. A measurement at 60% of the depth, measured from the surface, closely approximates the average velocity for the water column. In water greater than 76 cm in depth, the average of measurements made at 20% and 80% of the depth approximates the mean column velocity. Maximum culvert velocity (V_{max}) is the highest velocity encountered in all cross-sectional profiles in a culvert. V-occupied culvert velocity (V_{w0}) is the water velocity in the locations within a culvert where fish are actually swimming as opposed to a mean cross-sectional velocity or the maximum velocity. Fish swimming velocity (V_{fw}) is the velocity of a swimming fish with respect to the ground. It is the summation of the V-occupied velocity and the forward rate of movement of the fish through the water. (Intentionally Blank)	Fish Pass MOA wsign.doc 29 08/03/01

Comment Number: 71 (continued)	Comment Number: 71 (continued)
Beil, Milo C. 1986. Fisheries handbook of engineering requirements and biological criteria. U.S. Army Corps of Engineers, Fish Passage Development and Evaluation Program. Portland, OR. Brett, J.R. 1982. Swimming performance of adult pink salmon, <i>Oncorhynchus gorbuscha</i>, at 20°C and a comparison with sockeye salmon, <i>O. nerka</i>. Can. Tech. Rep. Fish. Aquat. Sci. 1143:1-37. Brett, J.R. 1967. Swimming performance of sockeye salmon (<i>Oncorhynchus nerka</i>) in relation to fatigue time and temperature. J. Fish. Res. Bd. of Canada, 24(8):1731-1741. Brett, J.R. 1965. The swimming energetics of salmon. Scientific American, 213:80-85. Brett, J.R. 1964. The respiratory metabolism and swimming performance of young sockeye salmon. J. Fish. Res. Bd. of Canada, 21(5):1183-1226. Brett, J.R. and Glass, N.R. 1973. Metabolic rates and critical swimming speeds of sockeye salmon (<i>Oncorhynchus nerka</i>) in relation to size and temperature. J. Fish. Res. Bd. of Canada, 30:379-387. Davis, G.E., Foster, J., Warren, C.E. and Doudoroff, P. 1963. The influence of oxygen concentration on the swimming performance of juvenile Pacific salmon at various temperatures. Trans. Am. Fish. Soc., 92:111-124. Dahlberg, M.L., Shumway, D.L. and Doudoroff, P. 1968. Influence of dissolved oxygen and carbon dioxide on swimming performance of largemouth bass and coho salmon. Fish. Res. Bd. of Canada, 25:49-70. Flagg, T.A., Prentice, E.F. and Smith, L.S. 1983. Swimming stamina and survival following direct seawater entry during parr-smolt transformation of coho salmon (<i>Oncorhynchus kisutch</i>). Aquaculture, 32:383-396. Fry, F.W.J. and Cox, E.T. 1970. A relation of size to swimming speed in rainbow trout. J. Fish. Res. Bd. of Canada, 27:976-978. Glova, G.J. and McInerney, J.E. 1977. Critical swimming speeds of coho salmon (<i>Oncorhynchus kisutch</i>) fry to smolt stages in relation to salinity and temperature. J. Fish. Res. Bd. of Canada, 34:151-154. Gubermick, Bob and Levesque, Stephen. Memo to USFS Tongass National Forest hydrologists, biologists, and engineers dated July 22, 1999. Howard, T.E. 1975. Swimming performance of juvenile coho salmon (<i>Oncorhynchus kisutch</i>) exposed to bleached kraft pulp mill effluent. J. Fish. Res. Bd. of Canada, 32:789-793.	Hunter, Larry A. and Mayor, Leslie. 1986. Analysis of fish swimming performance data. North-South Consultants and City Lights Engineering Consultants. Prepared for the Department of Fisheries and Oceans and the Alberta Department of Transportation. Winnipeg, Manitoba. Jones, D.R., Kiceniuk, J.W. and Bamford, O.S. 1974. Evaluation of the swimming performance of several fish species from the Mackenzie River. J. Fish. Res. Bd. of Canada, 31:1641-1647. Jones, Stanley H. and Fahl, Charles B. 1994. Magnitude and frequency of floods in Alaska and contiguous basins of Canada. U.S. Geological Survey Water Resources Investigations Report No. 93-4179. Anchorage, AK. Kane, Douglas L., Behlke, Charles E., Gieck, Robert E., and McLean, Robert F. 2000. Juvenile fish passage through culverts in Alaska: A field study. University of Alaska Fairbanks. Institute of Northern Engineering. Report No. INE/WERC 00.05. Fairbanks, AK. Masch, Frank D. 1984. Hydrology. Federal Highway Administration Hydraulic Engineering Circular No. 19. FHWA-IP-84-15. McLean, VA. McKinnon, G.A. and Hyntha, F.N. 1979. A survey of the fish resources of Liard tributaries as related to highway construction and operation, 1976-77. Can. Fish. Mar. Serv. Manuscript Rpt. 1483. McKinnon, G.A. and Hyntha, F.N. 1985. Fish passage assessment of culverts constructed to simulate stream conditions on Liard River tributaries. Can. Tech. Rpt. Of Fish. And Aquat. Sci. No. 1255. McLean, Robert F. Alaska Department of Fish and Game, Habitat and Restoration Division. Fairbanks, AK. Personal Communication, July 2000. Peterson, R.H. 1974. Influence of fertilization in swimming velocities of brook trout (<i>Salvelinus fontinalis</i>). J. Fish. Res. Bd. of Canada, 31:1757-1762. Powers, Patrick. 1993. Structures for passing juvenile coho salmon into off-channel habitat. In: Fish Passage Policy and Technology – Proceedings of a Symposium. Ken Bates Ed. American Fisheries Society, Bioengineering Section. Portland, OR. Pp. 101 – 108. Robison, G. 1998. Oregon road/stream crossing restoration guide: Summer 1998 draft. Oregon Department of Forestry. Salem, OR. Robison, G., Mirati, A., and Allen, M. 1999. Oregon road/stream crossing restoration guide: Spring 1999 draft. Oregon Department of Forestry. Salem, OR.
Fish Pass MOA wsign.doc	Fish Pass MOA wsign.doc
31	32
08/03/01	08/03/01

Comment Number 71 (continued)

- Water Resources Council. 1981. Guidelines for Determining Flood Flow Frequency. Water Resources Council Bulletin 17B.
- Weaver, C.R. 1963. Influence of water velocity upon orientation and performance of adult migrating salmonids. U.S. National Mar. Fish. Serv. Bulletin 63:97-121.
- Webb, P.W. 1977. Effects of size on performance and energetics of fish, pp. 189-237. In: Scale Effects in Animal Locomotion, Podley, T.J. (ed.). Academic Press, New York.
- Welch, H.E. 1979. Swimming performance of arctic char from the Saqvaquiac River, N.W.T., Canada. Fish. Mar. Serv. Tech. Rpt. No. 854-IV, pp. 7.

Comment Number 72

January 14, 2009

STB Finance Docket No. 34658
Surface Transportation Board
395 E. Street S.W.
Washington D.C. 204-0001

Attention:

David Navecky

Subject:

Northern Rail Extension Draft Comments
Proposed Rail Line – Oppose Salcha 2 Route & Favor Salcha 1 Route

Dear Mr. Navecky:

We are property owners in the Salcha area with six (6) parcels of land and a recreational cabin which would be directly and negatively impacted by the implementation of the proposed rail line route "Salcha 2" for the Northern Rail Extension. We strongly oppose the proposed Salcha 2 route because this route runs through and/or adjacent to our prime recreational property and would severely and adversely affect our intended use and value for this property. The alternate route "Salcha 1" is much more favorable to property owners in the area including us. Additionally Salcha 2 would create hazards and safety issues for property owners and trail users in the area.

We originally purchased this property because of the remote character and ability to recreate on the Salcha River, Tanana slough and trails in the area such as the old Valdez trail. The wilderness nature along with use of the land in the area would be inhibited by the construction, operation and noise of the rail line. The Salcha River and Tanana slough are prime recreational parcels for the Fairbanks community and outlying areas. We purchased the property and cabin for both personal use and as an investment. The intrinsic value would be severely diminished by the railroad transected this property via the Salcha 2 route, while the impacts of the Salcha 1 route would be minimal.

Additionally, our 30 acre parcel next to the Tanana slough (Property #1 – see list attached) appears to either be transected by the proposed Salcha 2 rail line or in very close proximity to this route. In either case this property would no longer hold any value to us and our investment would also likely become a complete loss.

We respectfully request that Salcha 1 Route be the adopted route for the Northern Rail Extension in the Salcha Area. If you have any questions regarding our comments and concerns, please feel free to contact us.

Sincerely,



Christopher & Debra Currow
P.O. Box 73811,
Fairbanks, AK 99707
(907) 456-4056

Attachments

Cc: Chris Millies, Regional Manager, Northern Region, DNR
Jeanne Proulx, Natural Resource Manager, Northern Region, DNR

Fish Pass MOA wsign.doc

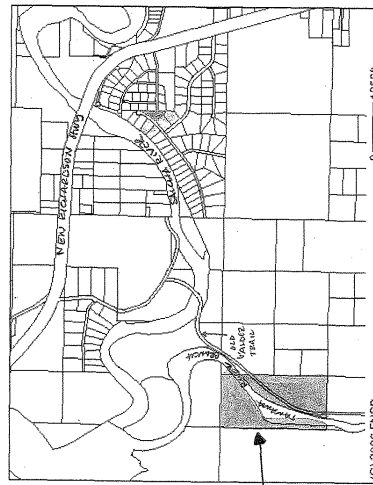
33

08/03/01

Comment Number: 72 (continued)

**Christopher & Debra Curnow Property List
Impacted by Proposed Rail Line - Salcha 2**

PROPERTY #	PAN	SITUS ADDRESS	ACRES	ABBREVIATED DESCRIPTION
#1	0193712		30.2	TL-2802 SEC 28 T5S-R4E AKA GL 2 & 3 SEC 28 5S 4E
#2	0452581	6972 HARRY LUCKE TRL	1.8	LOT 12 BLOCK 1 BIG SALCHAKET OUT OF TL-2200 SEC 22 T5S-R4E
#3	0452599	6985 BESSIE BARNABAS TRL	2.0	LOT 13 BLOCK 1 BIG SALCHAKET OUT OF TL-2200 SEC 22 T5S-R4E
#4	0452602	7001 BESSIE BARNABAS TRL	1.9	LOT 14 BLOCK 1 BIG SALCHAKET OUT OF TL-2200 SEC 22 T5S-R4E
#5	0453099	6996 BESSIE BARNABAS TRL	1.8	LOT 17 BLOCK 3 BIG SALCHAKET OUT OF TL-2200 SEC 22 T5S-R4E
#6	0453102	7010 BESSIE BARNABAS TRL	1.5	LOT 18 BLOCK 3 BIG SALCHAKET OUT OF TL-2200 SEC 22 T5S-R4E



= CURNOW PROPERTIES

Comment Number: 72 (continued)

Northern Rail Extension Draft Environmental Impact Statement

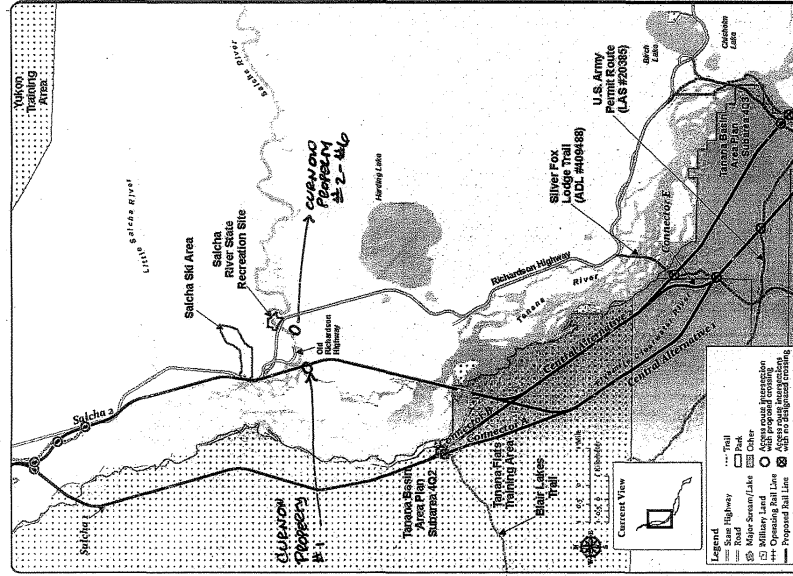


Figure 13.4 - Map of Recreational Facilities along the Salcha, Connector, and Central Alternative Segments

Land Use

13-33

Comment Number: 73 CHERYL SCHIKORA PO BOX 58388 FAIRBANKS, AK 99711 907-488-1724 January 31, 2009 David Novecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street SW Washington, DC 20423-0001 Dear Mr. Novecky: Let me thank you for this opportunity to provide some input on the Northern Rail Extension considered in Docket 34658. My comments mostly pertain to the area near the Richardson Clearwater – the South Common Segment. I have recreated in the Richardson Clearwater area for almost 40 years now. My kids were practically raised on the Clearwater most weekends with their grandparents. They learned about the outdoors, fishing and hunting in that area. It is a special place. I am concerned that the plans to build a railroad so close to its upper reaches may affect it permanently, making it a terrible place to take my grandkids. I believe that the South Common Segment should be moved to the south, out of the watershed. Move it closer to the military area. The railroad's purpose is to serve the military, so move it closer to them. One thing that its present proposed location would do is eliminate access to a significant amount of land between the railroad and the military area. My kids and other family members have recreated in this area over the years. Eliminating their access will be detrimental. I believe moving the project south would not have a significant affect on the project. What has been done to study that possibility? I am concerned about the noise generated by so many trains moving daily between Delta and Fairbanks. My in-laws lived by the train tracks in Fairbanks. When the train went by, all conversation stopped – because it had to. Moving the railroad to the south will significantly reduce the amount of noise generated by the trains. One of the beauties of the Richardson Clearwater area is the lack of noise. Have you done any baseline studies of how much noise is along the South Common Route and have you estimated the amount of noise that will be projected into the Richardson Clearwater area? I want to be able to converse with family and neighbors while on the Clearwater and not have to stop doing so just because a train goes by when it could be going by unnoticed if it were farther south.	Comment Number: 73 (continued) 3 Just how much damage to salmon eggs is expected due to vibration during the construction process and what affects will there be on the aquifer? I am significantly concerned about damage to the aquifer for a variety of reasons. The returning salmon, all pretty and red, are great fun to watch in the fall. Damage to their eggs could eliminate this run, which would be a significant problem. If you study the comments made during a recent timber sale in the area, you will note that people are significantly worried about the salmon runs and the potential damage to the up-wellings and springs in the area. For years, we have been able to drink water right out of the stream. I am significantly concerned that if your railroad damages the wetlands in the upper Clearwater areas that there will be too much siltation at times to do so in the future. Since the Carla Lake fire in 1998, we have noted a significant decrease in the ability of the ground in the upper Richardson Clearwater area to hold rainfalls. The Clearwater never used to change in its depth. Since the fire, several times when we endure heavy rains, the Clearwater has raised and the waters have become turbid. I am significantly concerned about the additional sediment run-off possibilities by the construction of the railroad, roads, camps and gravel pits in the area of South Common Segment. Wouldn't it be better to move the rail line south to where the impacts to this watershed from vibration and siltation are significantly lessened? 4 Of particular concern are spills of hazardous materials being carried by the ARR in the South Common Segment. The ARR doesn't have a good history when it comes to derailments and spills. Ask the folks north of Takeena about a mid-winter spill that occurred there. It was impossible to clean up. If any kind of spill of toxic or hazardous material, including but not limited to diesel, gasoline, fertilizers, cement or other construction materials were to occur, it could be particularly damaging to the fish species, wildlife species and habitat of the South Common Segment. These concerns also could be lessened by moving the rail line south a few miles, wouldn't they? How much extra would that cost in comparison to the priceless area that would be ruined by a spill? 5 Your document states that construction of the South Common Segment would result in the destruction or disturbance of two red-tailed hawk nests, two great gray owl nests, and one great horned owl nests. We have several bald and golden eagles in the area also. Why displace them or destroy their nests in the Richardson Clearwater area? 6 I thank you for the opportunity to comment on your EIS. I may not have covered every area of which I have concerns in this letter. I will add additional comments later if I have an opportunity. Please keep me informed of changes in the routing, construction methods and timeframes as the planning process continues. I am especially anxious to see how far south you can move this railroad. Moving it south will cure lots of ills with the project. 7 I had one heck of a time trying to respond in the 45 days of open comment period. Not only did I do some traveling, but there were three major holidays and one presidential inauguration in that timeframe. I believe you should extend the comment period for an additional sixty days to accommodate as many people as possible. This is a pretty big project for such a short comment period.
---	--

Comment Number: 73 (continued)

Please send additional documents and responses to my questions to the address.

Sincerely,

Cheryl Schikora

Cheryl Schikora

cc:

Chris Milles, Fairbanks Regional Director
State of Alaska
Department of Natural Resources
Division of Land, Water and Mining
3700 University Avenue
Fairbanks, AK 99709

Donald Perrin, Large Project Coordinator
State of Alaska
Department of Natural Resources
Office of Project Management and Permitting
550 W 7th Avenue, Suite 1160
Anchorage, AK 99501-1000

Comment Number: 74

Alyeska pipeline
ALYESKA PIPELINE CORPORATION

February 2, 2009

P.O. Box 186660

ANCHORAGE, ALASKA 99518-6660

TELEPHONE (907) 86-6700

APSC Letter No. 17799

*E1-16420
Redd 2/25/09*

Mr. David Navecky
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

RE: STB Finance Docket No. 34658 [Abstract] or N. 35468 [DEIS notice]
Alaska Railroad Northern Extension

Dear Mr. Navecky:

Thank you for the opportunity to comment on the subject Draft Environmental Impact Statement, issued on December 12, 2008 on behalf of the Applicant, the Alaska Railroad Corporation. Alyeska Pipeline Service Company (Alyeska) provides these comments on behalf of the owners of the Trans Alaska Pipeline System (TAPS) as their agent.

The DEIS describes a project that may run adjacent to TAPS for a segment and states that a) the project will cross TAPS, b) the project's construction would have to be closely coordinated with Alyeska and c) the project would meet all industry standards to ensure safety and minimal disruption to pipeline operations. We add that the project must be compatible with TAPS safety and integrity, including environmental impacts and that due to several factors, including variations in pipeline construction, further analysis is required to determine the best location for a TAPS crossing. If any TAPS compatibility concerns cannot be resolved, Alyeska reserves the right to object, on a site- or detail-specific basis, to the proposed design and construction of the rail extension project.

We look forward to participating in the success of this important project. If you have any questions or need other information, please call me at 787-8170.

Sincerely,

Peter C. Nagel
Peter C. Nagel, SR, WA
Lands Manager

cc: Tom Brooks, Assistant Vice President, Alaska Railroad Corporation
Mike Thompson, Alaska State Pipeline Coordinator
Jerry Brossia, USBLM Authorized Officer

Comment Number: 75 E1-16422 Rec'd 2/25/09 <i>Feb. 2, 2009 Ann. C. Blockbuster P.O. Box 56971 North Pole, AK 99701</i> David Navecky STB Docket # 34658 Surface Transportation Board 395 E Street, SW Washington DC 20423-0001 395 E Street SW Washington D.C. 20423-0001 <i>After receiving the EIS, let me suggest that Cognigant persons consider utilizing a 22 acre on the surface source of large gravel (Catala owned non- renewable mineral) located under my mostly unbroken farm ground, Section 6, T35, R3E, F.M. East 1/2 320 acres. This gravel location is within 2 miles of Cidlow AFB property near where the rail line segment 1 and 2 is proposed. This 2 mile designated public section line across could be a railroad spur or a heavy truck access to a tipped on/and concrete batch plant on the eastern Cidlow road property West half Section 4, T35, R3E, F.M. etc consisting of 240 acres. A railroad spur could travel down the eastern edge of Section 4, etc, property to around the Apple and concrete batch plant. This central location appears to be nearly ideal, meeting the needs of concrete and gravel for the segments 1, 2, 3 and the bridge construction. Yours for consideration Ann. C. Blockbuster P.O. Box 56971 North Pole, AK 99701</i>	Comment Number: 76 February 27, 2009 David Navecky Surface Transportation Board 395 E Street, SW Washington DC 20423-0001 ATTN: STB Financial Docket No. 34658 RE: Draft Environmental Impact Statement, Alaska Railroad Corporation, Construction and Operation of a Rail Line between North Pole and Delta Junction, Alaska Dear Mr. Navecky: The National Marine Fisheries Service (NMFS) reviewed the Draft Environmental Impact Statement (DEIS) and associated Essential Fish Habitat (EFH) Assessment distributed by the Surface Transportation Board (STB), regarding the proposed construction and operation of approximately 80 miles of new rail line from North Pole to Delta Junction, Alaska. Project Description The Northern Rail Extension (NRE) would extend Alaska Railroad Corporation's (ARRC) existing freight and passenger rail service south to the community of North Pole. The project would include construction of a parallel access road and related structures, such as a passenger facility, communications towers, construction camp sites, and staging, borrow and excavation areas. The DEIS presents several alternative rail alignments. Additionally, the DEIS proposes several voluntary measures to mitigate adverse effects on fisheries and habitat, such as erosion and sediment controls, seasonal construction restrictions, and the use of embedded culverts (Appendix G of the DEIS). Essential Fish Habitat Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires federal agencies to consult with the Secretary of Commerce on any action that may adversely affect EFH. The Act defines "EFH" as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" (16 U.S.C. 1802(10)). In Alaska, EFH has been designated for anadromous salmon and certain life stages of marine species of groundfish and crab under NMFS' jurisdiction. The proposed rail alignment would transect main tributaries of the Tanana, Salcha, and Delta rivers, as well as secondary and un-named tributaries, sloughs, channels and wetlands. This very complex ecologically connected series of terrestrial land forms and
---	--

Comment Number: 76 (continued) 4) Conduct fish surveys for all tributaries transected by the rail alignment to characterize the range and life histories of species within these watersheds, fill in data gaps in the Alaska Department of Fish and Game's anadromous waters catalogue, and improve information on appropriate mitigation measures 5) Elevate the rail line in wetland areas adjacent to and known to support anadromous spawning habitat to maintain connectivity of the groundwater hydrology and related hyporheic function (up and down welling water) that is critical to spawning site selection, egg and larval survival. 6) Employ Best Management Practices when constructing and placing artificial structures to promote natural hydrology and instream flows. Structures built over naturally occurring waters should conform to the natural stream gradients and stream channel alignment. Supporting structures should be designed to prevent scour and velocity barriers to anadromous species. Under section 305(b)(4)(B) of the Magnuson-Stevens Act, the STB is required to respond to NMFS' EFH Conservation Recommendations in writing within 30 days. If the STB will not make a decision within 30 days, then the STB should provide NMFS with a letter within 30 days to that effect and indicate when a full response will be provided. The STB and ARRC have an opportunity to set an example by considering the sensitive nature, relationship and connectivity of aquatic ecosystems and incorporating new technologies into rail construction to minimize adverse impacts to anadromous fish populations and their EFH. If you have any questions regarding our recommendations for this project, please contact Doug Limpinsel at 907-271-6579 or Doug.limpinsel@noaa.gov. Sincerely, Robert D. Mecum Acting Administrator, Alaska Region cc: SteveKokkinakis STB DEIS EFH North Rail Ext 2-26-09 final	Comment Number: 76 (continued) tributary systems supports habitat for aquatic resources, including EFH for anadromous salmon. EFH for salmon consists of the aquatic habitat, fresh and marine waters, necessary to support a long-term sustainable salmon fishery and salmon contributions to healthy ecosystems. Please visit our web site at http://www.alaskafisheries.noaa.gov/habitat/default.htm for additional information on EFH. The STB has determined the proposed project would adversely affect EFH and associated ecological processes. NMFS concurs with this determination. Specifically, NMFS is concerned the proposed rail alignments would fragment wetland and hydro-geomorphic processes, disrupting the riparian and hyporheic functions necessary to support salmon EFH. Ideally, rail alignments would be located in upland areas rather than in the watershed flood plain to avoid, minimize or mitigate adverse impacts to rivers, streams and the associated ecosystem processes provided by wetlands, riparian and hyporheic zones. Upland alignments also would eliminate future cumulative effects to EFH resulting from the transient lateral movement of rivers and streams, and eliminate the need for subsequent emergency remediation using riprap and bank armoring to stabilize threatened rail infrastructure during high water events. However, we understand the alternative alignments retained for detailed analysis also are based on technical and practical considerations including natural barriers, engineering design, cost-effectiveness, geological considerations and general land use patterns. In accordance with Section 305(b)(4)(A) of the Magnuson-Stevens Act, NMFS offers the following EFH Conservation Recommendations to avoid, minimize and mitigate the effects of the proposed rail alignment: EFH Conservation Recommendations 1) Construct bridges to span large rivers and arched or box culverts to cross smaller streams (>10 feet FBW). Free span structures, such as bridges over rivers and streams, provide migratory corridors for anadromous fish species and aquatic organisms, while maintaining ecosystem connectivity and natural substrate function in EFH. 2) Use stream simulation modeling to site tributary crossings with traditional corrugated large culverts (round or oval, 10 feet and 60 inches in diameter). Stream simulation methods consider natural environmental variables and incorporate habitat substrate within the structure, providing EFH and migratory corridors for anadromous fish species and aquatic organisms. 3) Use stream simulation modeling to site tributary crossings with traditional corrugated small culverts (round or oval, <60 inches in diameter) to help maintain water quality and tributary connectivity while minimizing impacts from head out, perched culverts and velocity barriers.
--	--

[illegible]

Comment Number: 119 (continued) 3 are interspersed with many private agricultural landholdings. While the trail is used for recreational purposes, it is not clear if recreation is the primary purpose.	9 Dispersed Use Areas: It is unclear how the vast majority of lands under ADNR ownership can be considered Section 4(f) properties. The lands in question have been designated for a number of uses including forestry, wildlife habitat, agriculture, watershed and public recreation. The Section 4(f) does not apply to multiple-use lands that function primarily for purposes other than park, recreation and refuges. The Surface Transportation Board should continue coordination with the public land managers (ADNR, COE, Eielson AFB, Fairbanks North Star Borough) to determine Section 4(f) status of resources along the routes of the North Railroad Extension. 10 Federally-funded transportation projects may use properties qualifying for Section 4(f) protection only if there is no prudent and feasible alternative to such use. In situations where use of Section 4(f) resources cannot be avoided, the project must include all possible planning to minimize harm to Section 4(f) resources. We cannot provide a concurrence statement regarding the provisos of Section 4(f) until a Preferred Alternative is identified for the project.	Summary Comments 11 The Department does not concur with Section 4(f) approval of this project at this time. We would be pleased to reconsider this position upon designation of a Preferred Alternative and receipt of revised materials concerning Section 4(f) property identification.	We appreciate the opportunity to review and comment on the Section 4(f) Evaluation. Please contact Joan Darrell, National Park Service, Environmental Planning and Compliance (telephone: 907 644-3526) concerning comments on the Section 4(f) Evaluation. Sincerely,  Willie R. Taylor Director, Office of Environmental Policy and Compliance
Comment Number: 119 (continued) 2 Section 4(f) status. In addition, the Section 4(f) Evaluation should include a map showing the location of the 100-mile Loop Trail to determine if it intersects potential northern rail extension routes.	3 Twentymile Slough Area Trails: This multi-use trail system is located on land with multiple owners. The majority of trails are located on Eielson AFB, which functions first and foremost for military use; the area also includes a variety of recreational uses. Surrounding public lands are managed for general land use, including recreation. Section 4(f) does not apply to multiple-use lands that function primarily for purposes other than park, recreation, and refuges. 4 Eielson AFB Outdoor Recreation Area: While being designated for outdoor recreation use in the Eielson AFB Integrated Natural Resources Management Plan, it is unclear if the Outdoor Recreation Area permits visitation by the general public at any time during normal operating hours of the facility. The FHWA's 2005 policy paper provides useful guidance in its response to Question C, which indicates that Section 4(f) would not apply when visitation is permitted to only a select group and not the entire public. Public access and use of the area is by permit only. Further investigation is necessary as to permitted visitation at the military recreation area.	5 Silver Fox Lodge Trail: It is unclear why this trail is deemed a Section 4(f) property. The description indicates that this multi-use trail, located on ADNR land, provides access to State land disposals along the Fivemile Clearwater River. In addition, the area surrounding the trail is designated for forestry and wildlife habitat uses in the Tanana Basin Area Plan. Forestry activity in this area is ongoing. The details provided in the text do not lead one to the conclusion that the Silver Fox Trail is a Section 4(f) property.	6 Koole Lake Trail (Donnelly-Washburn Trail): These trails are located on both ADNR and U.S. Army land and receive primarily winter use. ADNR land is managed primarily for forestry and wildlife habitat (Tanana Basin Area Plan, 1991). Military lands are primarily used for military use and are provisionally open to recreational use. The Army Permit route is primarily used to move vehicles and equipment between the Donnelly and Tanana Flats Training Areas but is open for public recreational use. Additional analysis is necessary to determine Section 4(f) status. 7 ADNR Forestry Winter Road: It is unclear why this trail is deemed a Section 4(f) property. This multi-use trail, established by ADNR Forestry Division, provides public access to a number of public and commercial timber sales in the Tanana Flats. The Tanana Basin Area Plan designates land surrounding the trail for forestry, wildlife habitat, agriculture, public recreation, and watershed uses. The primary purpose of this trail does not appear to be recreational. 8 Phillips Road/Delta Junction Area Trail Network: The Section 4(f) description for this trail indicates that it is multi-use in nature. The trail passes through ADNR lands that

Comment Number: 121 Duplicate of 70

Surface Transportation Board Incoming Correspondence Record

#E1-16347

E-Filing Correspondence Information **Status: In Process** **Recorded by: David Navecky on 01/31/2009**

* Required Fields

*Docket #:	FD 35468 0	Affiliation:	Self / Individual
*Name of Sender:	Joyce Whipple	Letter Type:	E-filing
*Group:	Unknown	NEPA Type:	Draft EIS Comment
*Date Received:	01/31/2009	In Public Docket?	☐ Yes ☒ No
*Date of Letter:	02/02/2009	Phone Number:	9074886201
*Group's Address:	P. O. Box 36199	Email Address:	jwhipple@hughes.net
*Group's City:	North Pole	Group's Zip Code:	99705
*Group's State:	AK		

Submitter's Comments

TO: Surface Transportation Board
 *395 E Street, SW
 *Washington, DC 20423-0001
 RE: STB Finance Docket No. 35468, Alaska Railroad Corporation - Petition for Exemption - To Construct and Operate a Rail Line Between North Pole, Alaska, and Delta Junction, Alaska; Issuance of Draft Environmental Impact Statement

To Whom It May Concern:

I am writing this on behalf of myself, Joyce A. Whipple, and my husband, William C. Whipple. Our residential address is 395 E. Street, North Pole, AK 99705; however, our mailing address is: P. O. Box 36199, North Pole, AK 99705.

We appreciate you sending us copies of the Environmental Impact Statement for referenced project, and can see that a lot of thought and research went into preparing it. It appears that you did a thorough job, and are trying to restrict the impact on the environment with the least amount of negativity. We do thank you for all of the work that is going into this project. However, whenever you go into a populated neighborhood with a project of this magnitude, there are going to be adverse results for many of the people living in the area.

Since we live in the Eielson Farm Road area, that is the area we are most familiar with and concerned about. We are lucky as one of the routes originally suggested would have been approximately 100 feet or less from our home, and we weren't sure exactly what would happen if it had been selected. We attended a meeting about 2 years ago about it, and the people in charge of the meeting weren't aware that most of the land in the Eielson Farm Road area is designated as "agricultural land" and has restrictions on the title. The land with these restrictions is only about one mile long and one mile wide. It is up to the State to decide what to do with the rest of the parcels, but at least 40% of the parcels are at least 40 years old. The second holding the title several years ago was not aware of this restriction. We also attended another meeting last month and the people holding that meeting didn't seem to know about the restrictions on the land in the Eielson Farm Road area. I suppose you could get some sort of special State legislation where you could take however much land you need for this railroad project, but no-one we've ever talked to seems to know how that would work. Since the route that would really have impacted us has been dropped, we didn't submit any written concerns.

I have recently learned that this project could have an adverse impact on one of my neighbors, Robyn Davies. She and her husband, Stuart Davies, subdivided their agricultural land a few years ago, and her daughter's home, which was only built about a year ago, was built on one of the subdivided parcels, and it is apparently right in the way of one of the routes that is under serious consideration.

Comment Number: 121 (continued) Duplicate of 70

We strongly urge that you select a route with the least impact on the people living in the areas where the railroad will go, including the Eielson Farm Road area, as well as all of the other areas. There are vast pieces of land owned by the State of Alaska, and the Federal Government. Since the main reason for the railroad extension appears to benefit the military, why not put the route on military land where it's possible. If that isn't possible, at least take every option possible to avoid peoples' homes.

Thank you for allowing us to submit our concerns.

Sincerely,
 William C. Whipple & Joyce A. Whipple

P. S. I am submitting this same information via written correspondence through the U. S. Postal Service.

STB's Comments

Image Attachment(s)

An attachment has not been added.

Comment Number: 122 Duplicate of 40

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E. Street S.W.
Washington, D.C. 20423-0001

Dear Mr. Navecky,

Thank you for the opportunity to provide input and comments regarding the proposed Northern Rail Extension for the Alaska Railroad (Docket No. 34658). The Environmental Impact Statement (EIS) is a very long and involved document and requires careful reading. We do not feel that we have had enough time to really do justice to our comments or recommendations and have rushed through them in order to get them completed in time. Below are some of our thoughts and comments, but more time would have been better. In addition to providing these comments, we are requesting 60 day extension of the comment period. There are still many people who were not notified and/or did not see the notices in the newspaper about the meetings.

We have some serious concerns with several aspects of the EIS for the Northern Rail Extension (NRE) and what it might mean for the habitat and fisheries in the Tanana River watershed, particularly the Richardson Clearwater (RCW). While we realize there must be some loss of wilderness to extend the railroad, the level of what appears to be "acceptable losses" seems severe. Some areas of the EIS acknowledge problems, but seem to push for the extension without regard for reasonably possible consequences.

Our greatest concern with the proposed NRE is the Southern Common Segment (SCS) and the plans to bridge two streams that form part of the headwaters of the RCW. In *Water Quality Study of Richardson Clearwater Creek Near Big Delta, Alaska* (Public Data File 99-21), Mary A. Maurer describes the RCW as a "large, fast-flowing stream with a steep gradient, a high degree of channel stability, and a short length. The RCW headwaters are formed by numerous springs, the largest of which contributes approximately 12 cubic feet per second of flow."

In addition to the pristine waters, the RCW hosts a high number of benthic invertebrates (small organisms that are an important food source for fish including many recreationally and commercially important species).² Ms. Maurer states that, "Benthic invertebrate numbers are typically higher in Richardson Clearwater Creek than in other Interior Alaska streams" and goes on to report that due to the "higher and more consistent groundwater input" the "habitat conditions are optimal for benthic invertebrate colonization." In addition, high water clarity, high dissolved gas content, and sufficient nutrient concentrations support abundant plant and animal life.³

Descriptions of the proposed bridges are not readily available, but if they use the same construction methods as the bridges proposed to cross the Tanana River, it seems that there can be catastrophic consequences to the headwaters of the RCW. Assuming use of piling for the bridge supports, the process of pounding the pilings into the gravel and substrate could damage the aquifers, limiting or changing the flow and output of the springs. Additionally, the compression of the initial pilings and vibration of train use of the ties could continue to compress the aquifers feeding the springs and changing the rate and/or quality of the water output. If another type of bridge system is to be used for crossing the headwaters, we would like to know more about the design and placement that might be used.

While it can certainly be changed, the RCW area, according to the Tanana Basin Area Plan, has been proposed for legislative designation as a Critical Habitat Area. Furthermore, the current plan designates primary use as recreation, but specifies the need "to protect the water quality and habitat of the Richardson-Clearwater drainage and Rainbow Lake."⁴ Areas of the RCW very close to the proposed headwater crossings are used for recreation by many users. They are popular for fishing, hunting, trapping, camping, and access to Rainbow Lake. The area

Comment Number: 122 (continued) Duplicate of 40

of river near the "confluences" (where the major springs to be crossed enter the RCW) are a frequent starting point for rafting, canoeing, and float trips. The proposed crossings appear to be within ½ mile of the RCW itself and the noise from the trains would disrupt otherwise quiet, peaceful interactions with nature that are currently enjoyed.

The EIS identifies the crossing at three streams in the SCS and acknowledges the use of the RCW as an anadromous fish stream. Proposed mitigation takes into account some concerns (pollution, bank erosion, etc.) but does not answer the greater question of disruption of spring flow, continued compression due to vibration, and damage to the RCW due to inevitable sedimentation during the building process and for several years afterward.

While the EIS proposes that there will be very little hazardous materials shipped, they will be shipped none-the-less. Additionally, it can be assumed that, as with Fort Wainwright and Eielson, there will be shipments of oil and fuel. Any derailment of hazardous materials and fuels could be disastrous for the RCW, its tributaries, and drainages. The EIS proposes mitigations, but those obviously must take place after the fact. While linings and absorbing materials may be of great use as an end result, they would not be deployed quickly enough to prevent serious damage.

It seems that a more direct, shorter, and less critical route would be to run the NRE at or near the Donnelly Training area directly to Delta Junction and/or directly to Fort Greely. While this route may increase construction costs somewhat, it would be more solid by avoiding more permafrost, swamp, and wetlands than the current proposal. Moving the route south would allow continued use of the area by recreational users and hunters without creating trespassing issues for those who want to hunt and fish in the Cole and Rainbow Lake areas. Moving the route south would increase the availability of military lands to be used by the Alaska National Guard and the Alaska National Guard's Joint Air Force. And finally, it would save potential devastation of the RCW, its headwaters, and drainages.

Please consider our thoughts and concerns. Thank you again for the opportunity to provide input. We will email our comments and a hard copy will follow in the mail.

Sources:

1. Division of Geological and Geographical Surveys—Public-Data File 99-21. Water Quality Study of Richardson Clearwater Creek Near Big Delta—Mary A. Maurer, March 1999.
2. Ace Basin Biological Resources <http://www.dnr.sc.gov/marine/mri/acebshar/benthic.htm>
3. Alaska Department of Natural Resources. Tanana Basin Area Plan for State Lands updated 1991. Primarily Chapter 3-Subregion 7 http://dnr.alaska.gov/marine/mri/tanana_basin_area_plan_for_state Lands.pdf

Sincerely,



Bill and Nancy Allen
P.O. Box 58498
Fairbanks, AK 99711
907-488-7372 (hm)

CC:

Chris Miles
Fairbanks Regional Director
DNR—Division of Land, Water, and Mining
3700 University Avenue
Fairbanks, AK 99709

Donald Perrin
Large Project Coordinator
Office of Project Management and Permitting
ADNR50 W. 7th Avenue, Suite 1160
Anchorage, AK 99501-1000

Comment Number: 123 Duplicate of 44

January 31, 2009

Mr. David Navecky
STB Finance Docket #34658
Surface Transportation Board
393 E. St. S.W.
Washington DC 20423-0001

RE: Draft Environmental Impact Statement Finance Docket #34658 Alaska Railroad Corporation Construction and Operation of a Rail Line between North Pole and Delta Junction Alaska.

Dear Sir:

My comments today concern the South Common segment of the northern rail extension between North Pole and Delta Junction. In the south common segment the plan calls for "three bridges over headwaters of the Richardson Clearwater River and several smaller drainages and would include culverts to cross drainage ways and wetland flow ways". "The three proposed bridges crossings and headwaters of the Richardson Clearwater River include single span bridges ranging from 45 to 65 feet in length".

THE RICHARDSON CLEARWATER

The Richardson Clearwater Creek is a spring fed perennial stream that flows Northwestward for fourteen miles to the Tanana River approximately 80 miles Southeast of Fairbanks, Alaska and is depicted on the westerly end of the south common segment. It receives the majority of its flow from ground water rather than surface water runoff. Consequently stream flow fluctuates within a very narrow range. The stream's headwaters are formed by numerous springs that emanate from a low bank at the 1000 foot elevation contour line in section 4 of township 9 south range 9 east, Fairbanks meridian. The largest of these feeder springs contributes approximately 12 cubic feet per second of flow. The stream also receives flow from small springs along its length and two spring fed tributaries.

The Richardson is a very unusual interior Alaska stream because of its short length, laminar flow, stable channel, and exceptional clarity. The streambed is composed of gravel and cobble size rock which is underlain by fine grained sand. Aquatic moss grows submerged in long sinuous clumps or mats attached to the streambed. Stream banks are vegetated and show no signs of erosion. The riparian habitat is a mature spruce and birch forest. Beavers are active near the headwaters and have impounded the tributaries in the recent past.

The Richardson Clearwater supports populations of Coho Salmon, Chum Salmon, Arctic Grayling, Round Whitefish and Longnose Suckers. Of the above species only Coho Salmon

Comment Number: 123 (continued) Duplicate of 44

spawn over winter in the creek. The other species use the stream as a summer feeding area. The only access to this creek is by boat or floatplane.¹

The Richardson Clearwater is characterized by its clear and cold water, stable discharge and the fact that it's access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. In a recent study by the Department of Fish and Game², The Ridder Study characterizes the river as follows:

"The Richardson Clearwater River rises from springs located on the southern flood plane of the Tanana River, three km west of Big Delta. The river is 19 km in length and enters the Tanana River 13 km downstream of Shaw Creek. As with other spring fed systems in the drainage, most notably the Delta Clearwater River, the Richardson Clearwater River can be characterized by its clear and cold water, and stable discharge. Access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. The river supports a recreational fishery for Grayling and little chum salmon. The Grayling fishery can be characterized as 'Blue Ribbon' due to it's availability of large fish, high density of fish, aesthetic qualities of the river and lack of direct road access."³

It is clear from the Department of Fisheries Study that the Richardson Clearwater River is a summer feeding grounds for the Arctic Grayling that migrate into the river in Mid May from spawning areas located in the Curibou and Rapids Creek in the Shaw Creek drainage area and the Good Pasture River. Tagging studies have shown that the migration is deliberate and characterized by a strong homing behavior.

With a water quality as documented in Footnote 1, The Water Quality Study, and with an abundance of the four varietal sects of fish as documented in Ridder Studies Footnotes #2 and #3, All of which are attached to this comment, there is no question that the Northern Railway extension at least as far as the south common segment is concerned will impact the existing ecosystem and may very likely have disastrous effects on it.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON WATER QUALITY

The water quality will be impacted by the construction and installation of bridges and culverts in the aquifer and wetlands of the Richardson Clearwater. Shuffling and erosion of the stream banks

¹ See water quality study of the Richardson Clearwater Creek near Big Delta, Alaska by Mary A. Maurer Alaska Department of Mining and Water Management Alaska Hydrological Survey March, 1999 released by State of Alaska Department of Natural Resources Division of Geological and Geophysical Surveys 794 University Ave., Suite 200, Fairbanks, AK 99709-3645 appended hereto.

² Contributions of Arctic Grayling from Caribou Creek to the Richardson Clearwater River and Shaw Creek, 1980 - Data by William P. Ridder, November 1994 Alaska Department of Fish and Game Division of Sportfish Fisheries Data by William P. Ridder, November 1994 Alaska Department of Fish and Game Division of Sportfish Fisheries Data by William P. Ridder, November 1994 Alaska Department of Fish and Game Division of Sportfish Fisheries

³ See Fishery Data Series #120 Age, Length, Sex and Abundance of Arctic Grayling in the Richardson Clearwater River and Shaw Creek, 1988 by William P. Ridder Alaska Department of Fish and Game Division of Sportfish, Juneau, AK 99802.

Comment Number: 123 (continued) Duplicate of 44

is a given. There will undoubtedly be increased channel scour, bank erosion and down stream sedimentation. It is unclear what effect thermal erosion of cuts made into the permafrost soils will have but one only has to look at the effect of the Carla Lake fire to see what effect the lack of vegetation in the wetland areas in the headwaters of the Richardson Clearwater has already had.

The fear of all of the residents of the Richardson Clearwater Creek is that three bridges, and numerous culverts that are planned, will destroy the aquifers and interrupt the flow of a totally spring fed river that houses numerous species of fish. We have already had one disaster at the headwaters of this river which was the Carla Lake fire in the summer of 1998. That fire burned approximately 54,000 acres and its effects on the Richardson Clearwater Creek have been annual floods in which the stream flow, organic matter content, turbidity, and color have been affected. The loss of vegetation due to the forest fire has produced an inability of the vegetation (in the headwaters) to contain the waters at times of heavy rains. Complicating this problem with three to four bridges and numerous culverts will very likely produce a complete disaster with regards to water stability, flow and turbidity.

Obviously geotechnical bore holes will provide direct communication between surface water and ground water but no one knows the effect it will have on the aquifers if they are drilled into. The proposed clearing of 251 acres in the south common segment at a time when the vegetation is trying to rebuild itself can only increase the turbidity and sediment loads associated with that action and with the installation of culverts and bridges.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON FISH HABITAT

The Clearwater River supports Coho spawning and rearing. The noise and vibration caused by pile driving and culvert installation will most certainly impact egg mortality and hatching time in areas near the stream crossings. Vibrations are known to negatively impact development on salmonid eggs and at certain times disrupt egg membranes leading to egg death. The most devastating thing that could occur in the Coho run is avoidance behavior which will cause them to abandon their winter spawning grounds.

Vibrations and pile driving activities as well as sediment will most certainly have an impact on the Grayling population who also may change their natural patterns and abandon the upper portions of the Richardson Clearwater.

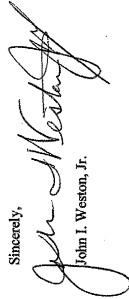
CONCLUSION

The aquifers and headwaters of the Richardson Clearwater produce the constant flow for the river. Any interruption of this flow by blockage of bore holes, bank erosion and downstream sedimentation will certainly affect the water quality of the Richardson Clearwater as well as the fish habitat for the four species of fish that inhabit that area. There is no question under these conditions which are especially fragile after the Carla Lake fire that the south common segment of the Northern Rail Extension should be placed further south and out of the headwaters of the Richardson Clearwater River. Placing it closer to Rainbow Lake or to the south of Rainbow

Comment Number: 123 (continued) Duplicate of 44

Lake would give the railroad almost a straight shot into the Donnelly training area and Fort Greeley using the Delta one alternative segment. There is no reason for the Northern Rail Extension to take the chance of drastically injuring the headwaters of the Richardson Clearwater. I would respectfully submit that if the rail extension is acted upon it should be placed much further south and out of the headwaters of the Richardson Clearwater.

Sincerely,



John I. Weston, Jr.

<u>Comment Number: 124 Duplicate of 50</u> E1- 16414 Rec'd 2/20/09 Ted and Tracy Morphis 3811 Erickson Ave #1 Fairbanks, AK 99709 Ted (907) 378-7048 tedm@contractors.com Tracy (907) 378-5282 tamorphis@ci.fairbanks.ak.us February 2, 2009 David Novecky STB Finance Docket No. 34658 Surface Transportation Board 395 E Street SW Washington, DC 20423-001 RE: Northern Rail Extension Environmental Impact Statement Subject: Public Comments In an effort to address concerns regarding the proposed route(s) for the northern rail extension we would first request that the public comment period be extended. There are several property owners from Salcha to Delta that have vested interest in the areas affected by the proposed route. In an effort to fulfill the "good neighbor" policy of the board we respectfully request the comment period be extended to our neighbors so they have time to comment on a project of this magnitude. Our comments are concerns and suggestions that might mitigate unnecessary and irreversible impacts of noise, vibration, water quality and state land access to hunting, fishing and camping areas. Foremost, we recommend moving the "South Common Segment" farther south to the already designated boundary for the military along the Northern Boundary of Restricted area 2202A. This would negate the need for bridges or culverts in conjunction with the Richardson Clearwater. It would reduce the amount of land closed off to public access to fishing and hunting areas and would minimize the amount of noise and vibration from the railroads daily use. The implementation of bridges or culverts could negatively impact the aqua firs and water quality of the Richardson Clearwater. Culverts or bridges would add to the detrimental environmental changes brought on by the Carla Lake fire in 1998, which left the soil in the headwaters of the river unable to sustain excessive rains.	<u>Comment Number: 124 (continued) Duplicate of 50</u> Moving the line farther south would open up access that would otherwise be locked up due to military "NO Trespassing" restrictions along with a dead-zone between the proposed restricted railroad area and the current military restricted area. Moving the line farther south would minimize the amount of noise and vibration that would negatively impact the recreation users along the Richardson Clearwater and the fish and wildlife habitat that thrive there. This shorter, direct and less disputed route would most likely create more costs but would minimize the impact it will have in the current route chosen. We recognize the financial impact and feel it is minimal in comparison to the adverse affect the current route will create. If the STB is not able to implement the "Good Neighbor" policy in regards to this request by considering moving then we would suggest the next step. More studies should be initiated to ensure the sustainability of the water quality, androgenous fish species, wildlife habitat and possible catastrophic effects on Critical Habitat Areas. Studies should also be done that are more current than those referred to in the EIS as mother nature has changed many characteristics of the Richardson Clearwater if not other streams subject to the impacts of the railroad implementation. More studies to the noise and vibration impact the rail line this close to a populated recreational stream will have on seasonal (summer) residents and retirees in this area as well as the wildlife that frequent the Richardson Clearwater and areas surrounding this area. Please consider our suggestions and those from all who are concerned about the affects of the construction and continued use of the railroad. We certainly do not oppose the construction of the railroad but we do object to the proposed location especially of the "South Common Segment". We do object firmly to the construction of a road along side or in conjunction with the railroad. We would need more time to adequately review the EIS in regards to the use and necessity of a road. Therefore, we request an extended comment period for this purpose. Respectfully, Ted and Tracy Morphis Attachments: Map of South Common Segment Cc: Chris Milles, Fairbanks Regional Director State of Alaska Department of Natural Resources Division of Land, Water and Mining 3700 University Ave Fairbanks, AK 99709
---	--

Comment Number: 125 Duplicate of 54



Fairbanks North Star Borough Office of the Mayor
809 Pioneer Road P.O. Box 71267 Fairbanks, Alaska 99707-1267
907/459-1300
Fax 907/459-1102
Email mayor@co.fairbanks.ak.us

EI - 16419
Rcd 2/25/09

February 2, 2009

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
385 E Street S.W.
Washington, DC 20423-0001

RE: Northern Rail Extension Draft EIS

Dear Mr. Navecky:

Fairbanks North Star Borough appreciates the opportunity to comment on the Northern Rail Extension Draft EIS. FNSB supports the development of the Northern Rail Extension and views it as a critical economic development project for the Borough and the State of Alaska. It is also a nationally significant transportation project, which will support military training and ongoing development at Ft. Greely.

Based on our review of the draft EIS, we would like to forward the following comments:

2-12 (Figure) Richardson Highway and Salcha School Relocation

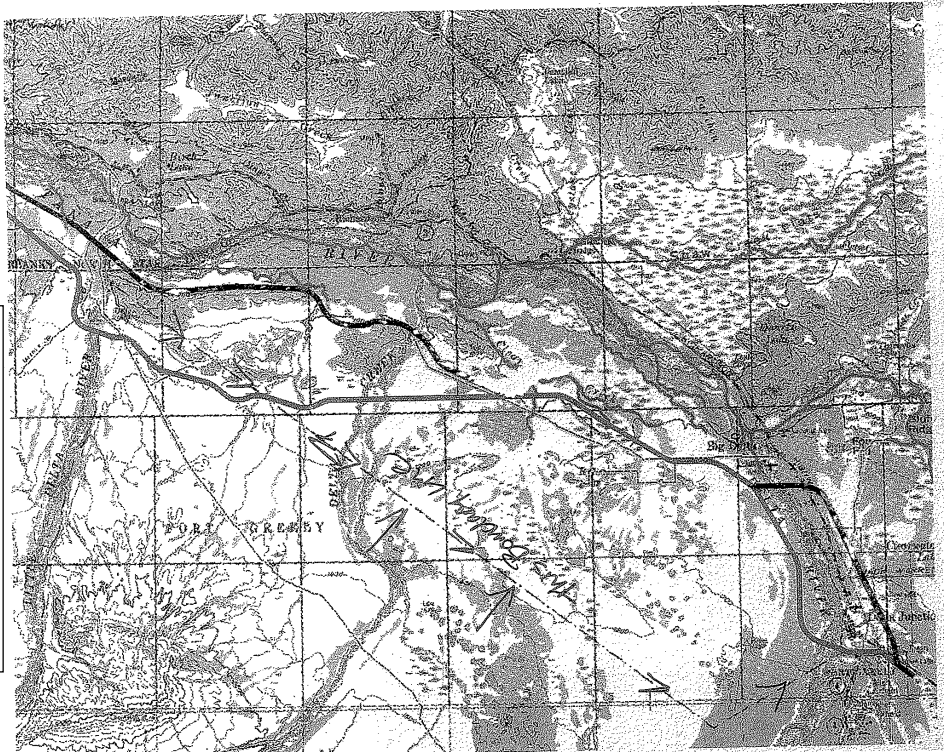
FNSB opposes the Salcha 2 Alignment, which would require the relocation of Salcha Elementary School. This would be a severe hardship for the Salcha Community, as this is the only elementary school in the area.

In addition, a native cemetery for the Salchaket Band of Athabascan Indians is located on the south end of the ridge as well as an archeological site. Both have significant importance to the history and culture of the State of Alaska and should be avoided.

4.2 Surface Water

The subsection on Excavation of Gravel Pits discusses material sources for this project. Later in Section 4.5 the draft EIS elaborates on what is proposed. It discusses 550 acres of borrow pits, one 17 acre pit every 2.5 miles, for a total of 33 borrow pits. There is no discussion on any reclamation of the pits. Certainly a number of these pits could be in locations where they could be reclaimed for recreational uses. Many pits originally dug for road projects are now very popular roadside fishing ponds, this project seems to offer similar potential. Perhaps a centralized larger pit could be provided to ultimately

Comment Number: 124 (continued) Duplicate of 50



Comment Number: 125 (continued) Duplicate of 54

Letter to David Navecky, Surface Transportation Board
February 2, 2009
Page 3 of 4

Tanana River would include long stretches with no designated public crossing points. Without creation of trail crossings along these long stretches, public access across the rail ROW would be significantly restricted or prohibited." We are in agreement with this statement and support the concepts regarding crossings that were recommended in SEA's Preliminary Mitigation Measures for 20.2.10 Land Use. We would, however, like to see some of the required mitigation measures strengthened.

Here are comments on particular SEA recommendations:

56) Recommends the applicant "consult" with U.S. Army Corps of Engineers and other agencies regarding impacts and mitigation regarding a planned project associated with the Moose Creek grade separation. We would like to see stronger wording requiring incorporation of the project into Northern Rail Extension project.

60) Requires the applicant "consult" with agencies to provide enough bridge clearance for passage of recreation watercraft. This should include the provision that any crossings of waterways will be constructed with at least the minimum clearances recommended by the agencies.

61) Good start, but this recommendation needs to be strengthened and expanded. It again requires the applicant "consult" with agencies, but it should also require construction of crossings for legal trail easements. It goes on to "include discussion of general dispersed-use access, informal trails on state land, blazed section lines, and long stretches of rail line without designated public crossings." This needs to go beyond "discussion". There needs to be a requirement for legal crossings at some minimum interval to provide for general access across the corridor.

62) This covers the main trails that the proposed corridors would cross that we are aware of within the Borough.

63) The "shall consider" wording does not provide much assurance. They should have to provide crossings to accommodate the named trail facilities. In some cases, the aforementioned crossings at minimum distance spacing may be adequate.

Overall

The draft EIS does a comprehensive job of analyzing many of the potential impacts of the rail extension corridor. The mitigation measures proposed by the applicant and SEA in Section 20.2 address the majority of the impacts of the project. Additional work needs to be done to explain where crossings of the corridor will be provided to accommodate existing and future roads and trails and crossings in general. This should

Comment Number: 125 (continued) Duplicate of 54

Letter to David Navecky, Surface Transportation Board
February 2, 2009
Page 2 of 4

be developed into a Cienra Lakes type facility for Delta Junction. Reuse of these material sites should be addressed by the plan and included in the mitigation measures.

4.5.2 Environmental Consequences

On page 4.55 of the EIS states "Construction of the rail line would require that the 200 foot ROW be cleared of surface vegetation." While it is understandable that much of the corridor would be cleared to provide visibility to avoid moose strikes etc., there should be some sensitivity to adjacent land uses. One area of particular concern is the proposed alignment adjacent to Pledriver Slough. Hopefully, some buffers will be mandated for well used recreational sites like this, that would supersede a blanket 200 foot clear-cut. This should be addressed by a mitigation measure.

4.6 Floodplain Resources

Is it anticipated the construction of the new rail corridor will either positively or negatively impact flooding in the Salcha area?

11. Transportation Safety and Delay

The existing crossing of the Richardson Highway to serve Eielson AFB does not seem to be addressed. "Would this project modify the existing crossing? Is a grade separation proposed as part of this project?"

20.2.10 Land Use

While there is discussion on access to trails, the Draft does not really deal with preserving existing legal access for local roads. There are no diagrams depicting land ownership and local dedicated roads. It is our understanding that crossings will be limited by the anticipated speed of the trains, thus presenting a significant impact to the people who will either be separated from their property by the right of way acquisitions or forced to travel great distances to get to their farms or homes, depending upon the circumstances. The railroad has a number of crossing tools to allow and control access, from elevated crossings to gates and lights, and culverts. The assessment needs to more specifically identify how they can deal with existing crossings and allow for future access where none presently exists. Public road rights-of-way need to be protected by the process.

Adequate crossing locations need to be provided to ensure that the proposed rail corridor will not eliminate existing recreational opportunities on the other side of the corridor. The EIS states, "Many of the alternate segments west and south of the

Comment Number: 125 (continued) Duplicate of 54

Letter to David Navecky, Surface Transportation Board
February 2, 2009
Page 4 of 4

include the type and design of crossings proposed and the time frame for construction. The Fairbanks North Star Borough supports the Alaska Railroad's preferred Eielson 3 option, the Alaska Railroad's preferred Salcha 1 option, and does not express an opinion on the Connector and Donnelly options.

Fairbanks North Star Borough fully supports the project to extend the Alaska Railroad to Delta Junction. We thank you again for the opportunity to provide comments and anticipate that our comments will be addressed in the final EIS for this project.

Sincerely,



Jim Whitaker, Mayor

JWtb-csm

Comment Number: 126 Duplicate of 38 El - 1642) Rec'd 2/25/09 22/09 To: Alaska Railroad Corporation Attn: Stephanie Wheeler Public Involvement Officer PO Box 107500 Anchorage, Alaska 99510-7500 From: Delta Fish & Game Advisory Committee PO Box 605 Delta Jet, AK 99737 Vern Alton Jacob White Dean Cummings Regarding: Comments regarding Alaska Railroad Northern Rail Extension. These comments are in regards primarily to that portion of the proposed Northern Rail Extension that is South and west of the Tanana River. CROSSINGS: There is a long history of miners, trappers, hunters, fishers, explorers and hikers crossing the proposed right-of-way on foot and by dog sled, ATV, snowmobiles and heavy equipment. Because these people will continue to access that area, it's imperative that there be numerous RR crossings to protect these travelers and to maintain the RR bed to prevent erosion. As a minimum, there should be crossings at: 1. Trail across from Delta BLM Airstrip 64°05' 02" approximate. 2. Section Line E/W 64°05' 02" approximate 3. Section Line N/S 64°07' 37" approximate 4. Rainbow Lake/Forestry Road 64° 08' 33"N 145° 57' 40" approximate 5. West End Winter Forestry Road 6. Dry Channel of Delta Creek [access to full flood plain] 7. Delta Creek [access to full flood plain] 8. Coole Lake Trail	Comment Number: 126 (continued) Duplicate of 38 9. Donnelly Washburn Trail 10. Little Delta River [access to full flood plain] 11. DNR Winter Trail All bridges should allow adequate under-passage for watercraft and land vehicles. WILDLIFE Newly pioneered rights-of-way expose unwary wildlife to abuse by construction and RR crews. Possession of firearms by construction crews should be strictly prohibited with severe penalties for contractors violating the prohibition. No portion of the proposed right-of-way should be vegetated with any plant life that attracts wildlife and exposes the wildlife to construction and train traffic. CC: AKDNR AC file
--	---