

EI-18151

Willow Area Community Organization
Box 1027
Willow, Alaska
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David Navecky
STB Finance Docket N. 35095
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

RE: Comments on Draft EIS

May 10, 2010

Dear Mr. Navecky,

The Willow Area Community Organization (WACO) wishes to respond to the Draft Environmental Impact Statement regarding the proposed Port MacKenzie Rail Project (Docket N. 35095). WACO has a special interest in this project since two of the eight proposed Alternative routes will bisect the Willow community, impacting residents, businesses and recreation.

After reviewing the recent Draft Environmental Impact Statement, the membership (Board) concluded that both Mac East, and Mac West Willow Alternatives would have significant negative impacts on the community with no clear advantages, thus voted to oppose these corridors as the preferred alternative. Instead, WACO supports either the Mac East Houston South Alternative or the No-Action Alternative.

Willow is a residential and recreational community that values its parks, trails, lakes and streams and all related outdoor activities. The community grew up around the existing mainline of the railroad where residential, business and recreational areas could locate and develop appropriately. The proposed rail line would bisect existing neighborhoods and parks and would be in parallel with the existing line only a few miles away. Trains traveling at 60 mph, as described in the DEIS, with accompanying noise, vibration and coal dust, would create disruptions and safety concerns unacceptable to families living nearby.

Further, there are no plans mentioned in the DEIS or by the Alaska Railroad to construct a depot at the junction of the spur or the mainline or any other plans that would benefit Willow economically. Many businesses in Willow depend on recreation and the tourism it provides. Fishing guides, tour operators, service stations and stores owners providing gas and supplies know that people coming to Willow to recreate do not expect nor desire to see long, noisy freight trains in a semi wilderness setting.

Recreation, natural beauty and seclusion are what the vast majority of people like best about Willow according to the 2009 Willow Comprehensive Community Survey (page 5, view at the MSB website). That is why the environmental impacts on public land and Section 4(f) properties that are describe in the Draft EIS are such important considerations to the community.

There are two very popular State managed Section 4(f) properties within the Willow Segment of the rail line, the Willow Creek and Nancy Lake State Recreation Areas. (SRA). Other 4(f) resources mentioned include trails associated with the West Gateway Trail System. These three heavily visited areas are adjacent to each other and offer extraordinary recreational opportunities for the public throughout the year. Winter activities include snow machining, dog sledding, skiing hunting, and races and events such as the Iditarod Sled Dog Race.

The Willow Creek SRA offers some of the best fishing and floating experiences in Alaska. The DEIS states that the Willow Creek SRA, "receives intensive sport fishing activity... fishing, camping, floating/boating, winter trails, wildlife viewing, and hunting" (13.2-12) The Willow Segment will bisect the heart of the Willow Creek SRA, crossing the historic Lucky Shot Trail and Willow Creek itself. The clearing of vegetation, loss of fish and wildlife habitat and noise/vibration associated with the operations of the railroad will severely compromise the semi wilderness experience people from throughout the State and Nation come to Willow to enjoy.

There are many other public recreational lands not associated with Section 4(f) that will have direct impact by the Willow Alternatives. As described in the Summary chapter of the DEIS, the impacts on these lands with the Willow Alternative will be the most severe in comparison to all other Alternatives. This is in regards to the amount of vegetative loss (S.6.3.1), wildlife and fish habitat loss (S.6.3.2-3), cultural and historical resources (S.6.4) and noise and vibration (S.6.7).

WACO and the city of Houston have agreed through a joint resolution in supporting the Houston South Alternative. This route is consistent with the Houston Comprehensive Plan and has the least environmental effect of all the alternatives as described in the Draft EIS.

The Willow Alternatives will have a unacceptable social and environmental impacts on the Willow Community without any economic benefits. Therefore, the Willow Area Community Organization opposes the Willow Alternative Corridors for the Port MacKenzie Rail Spur and recommends either the Houston South for the preferred alternative or the No-Action Alternative.

Sincerely,

Linda Oxley, chair
Willow Area Community Organization