



MATANUSKA-SUSITNA BOROUGH

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February 1, 2010

Victoria Rutson, Chief
Section of Environmental Analysis
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423

Re: STB Finance Docket No. 35095, the Alaska Railroad Corporation-Petition for Exemption for Construction and Operation of a Rail Line Extension to Port Mackenzie, Alaska; Request for Information Regarding 4(f) Applicability, Measures to Minimize Harm, and *de minimis* Findings

Dear Ms. Rutson;

This letter is in response to your request for input from the official with jurisdiction over the resources identified below regarding: (1) the applicability of Section 4(f) of the U.S. Department of Transportation Act of 1966 to the recreation resources that could be affected by the above-referenced project (Port Mackenzie Rail Extension); (2) whether there are any other resources under Matanuska-Susitna Borough (MSB) jurisdiction that qualify as Section 4(f) resources and would be affected by any of the alternatives for the proposed rail line; and (3) where the proposed project may require the use of a Section 4(f) resource, whether proposed mitigation and measures to minimize harm would support a finding of *de minimis* use.

MSB has determined that some of the alternatives analyzed for the proposed Port Mackenzie Rail Extension will definitely have an effect on one or more recreational resources located within MSB-managed lands that may be protected under Section 4(f). MSB has reserved recreational public use easements along significant trail corridors that cross MSB-owned lands. These reserved trail corridors play an important role in meeting the objectives of MSB Community Development and the local communities through which the corridors travel, by preserving important recreational opportunities on public lands and access for private landowners to reach their remote parcels.

To facilitate the Surface Transportation Board's (STB) Section of Environmental Analysis (SEA) in developing a Draft Environmental Impact Statement (DEIS), MSB provides the following summary of impacts to the identified recreational resources.

- **Point Mackenzie Trailhead Parking Lot:** The Point Mackenzie Trailhead was constructed in 2000 using Alaska State Parks Snowmobile Trail Grant funding and is the only recreational trailhead in the Point Mackenzie area. It provides trailhead access to Susitna Flats State Game Refuge, Figure 8 Lake, Lake Lorraine and the Point Mackenzie area. All alternatives of the rail extension will significantly impact the trailhead to the degree of it being unusable as a trailhead. MSB has investigated relocating the Point Mackenzie trailhead approximately one mile to the north. Developing the trailhead east of the rail extension would require a separated-grade tube crossing to allow snowmobile and other recreational access to the west. Mitigation measures outlined in the STB letter dated November 9, 2009 for relocating the Point Mackenzie Trailhead would make the potential impacts *de minimis* for this Section 4(f) resource.

- *Figure 8 Lake Loop Trail.* Figure 8 Lake Loop Trail is identified and documented in the MSB Recreational Trails Plan but does not have legal easements. The trail is planned to be surveyed. The eastern end of the Figure 8 Lake Loop Trail would be impacted in two areas by the Mac West alternative. Mitigation measures outlined in the STB letter dated November 9, 2009 for relocating the eastern end of the Figure 8 Lake Loop Trail would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Iditarod Link Trail.* Iditarod Link Trail has a legal easement and would be impacted by the Willow route alternative. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Crooked Lake Trail.* Crooked Lake Trail has a legal easement and is a heavily used trail providing access between Big Lake area and Susitna River and would be impacted by the Willow route alternative. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Iron Dog Trail.* Iron Dog Trail has a legal easement and is a heavily used trail providing access between Big Lake area and Susitna River, is used for the Iron Dog Snowmobile Race, and would be impacted by the Willow route alternative. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *West Gateway Trail.* West Gateway Trail has a legal easement and is the main recreational access corridor out of Willow to the west. Where the proposed Willow route alternative crosses the West Gateway Trail, the alignment appears to be along the boundary between State of Alaska land and Alaska Department of Transportation Right-of Way ADL 216410. Regardless of land ownership, mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Aurora Dog Mushers Trail System.* The Aurora Dog Mushers Trail System is a well-developed multi-use trail network used for recreation, training and races. It is managed under a Cooperative Resource Management Agreement between the State of Alaska, Matanuska-Susitna Borough and the Aurora Dog Mushers Club. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Herning Trail.* Herning Trail is a heavily used historic RS2477 trail (RST-1467) providing access from Knik northward to the Alaska Railroad. This trail is multi-use and an important transportation corridor. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.

Other potential Section 4(f) resources that would be affected by the proposed rail line include the following trail crossings:

- *Iditarod National Historic Trail.* Iditarod National Historic Trail is a heavily used historic RS2477 trail, known as the Knik-Susitna Trail (RST-118) through this area. The Willow Route will impact this trail in the W1/2, W1/2, Section 15, T16N, R04W, S.M., Alaska, where the trail right-of-way traverses MSB-owned land. The Big Lake Route will impact this trail in the SW1/4, Section 16, T16N, R03W, S.M., Alaska, where the trail right-of-way traverses MSB-owned land. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.

- *16 Mile Trail.* 16 Mile Trail is a heavily used multi-purpose trail with platted right-of-way. The Big Lake Route will impact this trail in the NE1/4, Section 29, T16N, R03W, S.M., Alaska, where the trail right-of-way is adjacent to MSB-owned land. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.
- *Big Lake Trail #13(Knik Connector Trail).* Big Lake Trail #13 (Knik Connector Trail) is identified and documented in the MSB Recreational Trails Plan as a multiple-use, predominantly winter trail but does not have an easement. The Big Lake Route will impact this trail near the southern edge of the N1/2, Section 30, T16N, R03W, S.M., Alaska, where the trail enters onto MSB-owned land. Mitigation measures outlined in the STB letter dated November 9, 2009 for providing a grade-separated crossing would make the potential impacts *de minimis* for this Section 4(f) resource.

The above-referenced trails/trailhead identifies all the MSB-managed Section 4(f) resources potentially affected by the proposed Port Mackenzie Rail Extension. There are no other MSB-managed Section 4(f) resources potentially affected by the proposed project. The potential mitigation measures outlined in the STB letter dated November 9, 2009 for providing grade-separated crossings and/or relocations of trails and trailheads would make the potential impacts *de minimis* for the Section 4(f) resources referenced above in this letter.

Once the final Port Mackenzie Rail Extension route has been identified, trail crossings can be looked at on a case by case basis to determine the most effective and cost-efficient mitigation measure for the specific Section 4(f) resource being impacted.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Brenner". The signature is fluid and cursive, with the first name "Linda" and last name "Brenner" clearly distinguishable.

Linda Brenner, Community Development Director