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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 Donnelly1, 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 Donnelly1 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.

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

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

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:

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