

February 1, 2009

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

EI- 16400
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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

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 to highway usage?

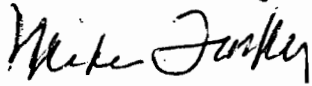
The applicant should not rely on the general concept of "poor soils" to not consider other minor re-routes to the alternatives. The present track system between Seward and Fairbanks crosses some very poor soils and has crossed them for all the years of operation. Soil conditions are one of the issues 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 Salcha 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.

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.

A handwritten signature in black ink, appearing to read "Mike Tinker". The signature is written in a cursive, flowing style.

Mike Tinker for the Fairbanks Fish and Game Advisory Committee

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