

EI-18177

May 4, 2010

Mr. David Navecky

STB Finance Docket No. 35095

Surface Transportation Board

395 E. Street S.W.

Washington, D.C. 20423-0001

Re: Port MacKenzie Rail Extension Project

This is a follow-up letter to my presentation at the meeting in Anchorage on April 6. A copy of my testimony is attached (Attachment A). I also incorporate, by reference, the map titled Road and Recreation Map of the Matanuska Valley that I presented to you at that meeting.

At this point in time, Alaska is confronted with huge challenges: gas pipelines from the North Slope, drilling for oil in the Chukchi and Beaufort Seas, A Pebble Mine project, hydro power development, Knik Arm Crossing and need for sufficient natural gas supplies in Cook Inlet to serve Anchorage and surrounding communities. All of these have been, or will most likely be, subject to litigation or other contentious proceedings.

The original impetus for the rail extension was for delivery of coal to the Kenai Peninsula. That need no longer exists. The agrium plant and associated gasification of coal from Port MacKenzie are dead. At the present time, shortening the rail distance to the interior by approximately 35 miles may not justify a projected \$300 million rail extension.

In my testimony and correspondence during the last 2 ½ years of review concerning "illegal crossing" of the ROW, I neglected to clarify that illegal crossings would occur most often during the five or six month period of winter when snowmachiners and dog mushers use the area for recreation and training. Snow trails crisscross the entire area. From my review of the Draft EIS, I do not find any analysis of use of the area during winter. In that regard, I find the EIS is seriously flawed.

The recreation area during the four or five months of summer cannot be substantially used by hikers and four-wheelers (ATVs) because of wetlands and other risky areas.

I am not aware of any analysis that demonstrates a promise or commitment from shippers to produce long-term return on investment for the port or rail extension. The present mainline and Port of Anchorage have served and can adequately service the needs of the state of Alaska.

However, if this project can be viewed as economically viable, environmentally responsible and your board is inclined to approve a preferred route, it is imperative that the Houston alternative be removed from consideration in the public interest for the following reasons:

1. The route, without question, cuts a large recreation area in half. Winter recreation users will be refused east/west travel without illegal crossing of the tracks. The service road along the track will most likely be used as a main trail by users to find locations to jump the track where snow conditions look good on the other side. There may be official and unofficial trails, but kids and adventurers make a trail anywhere if snow depth permits. This is what prompts illegal crossing.

Your Figure 13.2-5 at page 13.2-10 shows trails but it does not fairly represent the free movement by snowmachiners east/west and west/east across the Houston route (Attachment B).

2. You told me that no analysis of winter usage in the recreation area by snowmachiners and dog mushers was conducted.
3. The Houston Route cuts through a large watershed area. In particular, the route between Muleshoe Lake and the adjacent unnamed lake to the east could disrupt the surface, subsurface and spring-fed movement of water that feeds Little Horseshoe Lake (West Lake) that in turn feeds Horseshoe Lake. If this movement of water is disturbed by rechanneling, damming or segregating, the affect could be drying up of the four lakes. This would have huge consequences for property owners around those lakes. The lakes are not at the same elevation.
4. The route between Muleshoe Lake and the adjacent lake totally destroys a popular snowmachine/dog mushing trail. The trail could not be relocated because of the two lakes which cannot be used during the spring breakup even though travel could be open with adequate snow depth on land.
5. Also, as I stated in my remarks on April 6, wetland evaluation is the area 500 feet on either side of the segment. See Attachment C. Where the route passes between Muleshoe Lake and the adjacent lake, the area extends approximately 200 feet into each lake. See Attachment D.

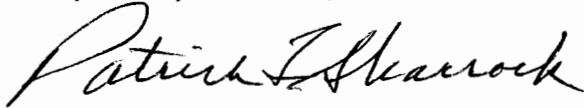
The impacts I have noted, in my opinion, are not de minimus.

The Willow route:

1. Has been adopted by the Mat-Su Borough by including the June 2003 Rail Corridor study in its Comprehensive Plan. See Attachment E and F.
2. Affects the least population and wetland area.
3. Has de minimus impact to state recreational areas and possible historical sites.

4. Is best suited for future development with expansion of the ROW to accommodate other services.

Respectfully submitted,



Patrick L. Sharrock

8731 Solar Drive

Anchorage, AK 99507

Ph. 907-345-5353

email – patsharrock@alaska.net

cc: Matanuska-Susitna Borough Assembly
350 E. Dahlia Ave.
Palmer, AK 99645

Matanuska-Susitna Borough Planning Commission
350 E. Dahlia Ave.
Palmer, AK 99645

Attachments:

- A My remarks at the April 6, 2010 Public Comment Meeting
- B EIS Figure 13.2-5
- C Appendix C, page
- D Google rendering of Muleshoe Lake and adjacent lake
- E Mat-Su Borough ordinance 05-011(AM) to add the June 2003 Rail Corridor Study to the Comprehensive Plan
- F Mat-Su Borough Resolution 07-139(AM)

Testimony - Patrick L. Sharrock
Surface Transportation Board Draft EIS for Port McKenzie Rail Extension

April 6, 2010, Wilda Marston Theatre, Anchorage, AK

Mr. , Thank you for this opportunity.

My name is Patrick Sharrock. I have lived in Anchorage for over 63 years and have owned recreational cabin property near the Houston Alternative Route for 40 years. I am not an environmentalist, hydrologist or geologist. My comments are based on observation.

Giving the benefit of the doubt, I have reviewed the draft EIS and it appears to fairly represent the issues at hand. However, I am still seriously bothered by two concerns that I have noted in earlier comments during the last 2 ½ years.

A. Recreation

1. First I want to bring to your attention a map titled "Road and Recreation Map of the Matanuska Valley." The map has a 1972 copyright and clearly includes the area bounded by the Willow Alternative and Big Lake Alternative. (1972 was the year of infancy for snow machines and The Iditarod Sled Dog Race). The only trails shown on the map are the Historic Iditarod Trail and some trails south of Willow around Long Lake.
2. I now refer you to Figure 13.2-5, page 13.2-10 in the draft EIS. Please note the multitude of trails all over the place. In particular, look at the area west of the Houston Route. Very important is that those trails will not be accessible from the Big Lake/Horseshoe Lake area without illegal crossing of the Houston-Houston North routes. Likewise, snowmachiners traveling from areas west of the Little Susitna River would not have access to the eastern area without illegally crossing the Houston Alternative.

Additionally, these are not official trails listed at Tables 13.2-2 and 13.2-3 on page 13.2. The second paragraph states "blockage of unofficial trails would be considered a permanent adverse impact to recreational trails, trail use, and recreational access" and the public could not cross the Right of Way without approval from ARRC. Lastly, unofficial trails are those trails created anywhere when snow depth allows. I, along with family members, neighbors near Horseshoe Lake and probably thousands of other snowmachiners, cross the Houston Alternative every winter.

3. The Houston Alternative clearly bisects a large recreational area that is used by residents in the Mat-Su Valley and Anchorage and encourages illegal crossings.

B. Wetlands

1. I refer back to the maps I noted above. Please observe the two distinct water areas within the alternative route areas. In the northwestern area, west of the Little Susitna River, we have a large number of unusually formed lakes. In the eastern area we have lakes similar in configuration until you reach the latitude above Big Lake. I certainly cannot give a reason for the huge contrast, but the areas are separated by the Little Susitna River. As mixed up as that river is, I would not be surprised to learn that at some time, the river drained through the eastern area. Maybe the layout could be from glacial activity. In any event, it is now void of a distinct drainage system.
2. My observation is that drainage could be similar to the Florida Everglades. Water moving imperceptibly slow but affecting a large area.
3. The following approximate elevations manifest the southerly flow of water in the area.

Seymour Lake	300'
Beaver Lake	190'
Muleshoe Lake	175'
West Lake (Little Horseshoe Lake)	160'
Horseshoe Lake	160'
Hourglass Lake	155'
Big Lake	145'

These changes in elevation were also manifested by the rains in 2006. Overflow water from the area around Muleshoe Lake flooded into West Lake. I don't think the result of the rain could be observed from the air, but our lake rose by approximately 16". The rise was from the rain itself and the overflow streams. So where did the water go? I can only conclude that some became part of the groundwater system that feeds lakes and some migrated south as surface water until normal drainage level was reached.

4. If a Houston Alternative had been in place, one wonders how movement of water would have been disturbed. I suspect that the Houston corridor would have acted as a dam depriving water from entering, leaving or both, the wetland area.
5. The distance between Muleshoe Lake and the unnamed lake to its east is approximately 600'. The 200' on either side of the segment for purposes of the wetlands evaluation within 1,000 feet, noted in Appendix C, page C-1, lies within each lake.

6. Sandhill cranes and eagles nest in the Horseshoe Lake area and behind Muleshoe Lake.

Mr. Chairman, in my opinion, and I suspect the opinion of many others, my conclusion is: if the Houston Route is built, it bisects a large recreation area and produces a disservice to the recreation population in the Cook Inlet area. Additionally, it constricts the natural southerly migration of water east of the Little Susitna River. Even though this area is not named a "recreation area" like the Little Susitna River, Nancy Lake and Willow areas, I would name it the "Big Lake-Horseshoe Lake Public Use Recreation Area" subject to FRA funding limitations.

Impact from the project on the issues I raise is not de minimus. The Willow Route is the most logical route for this project.

Thank you.

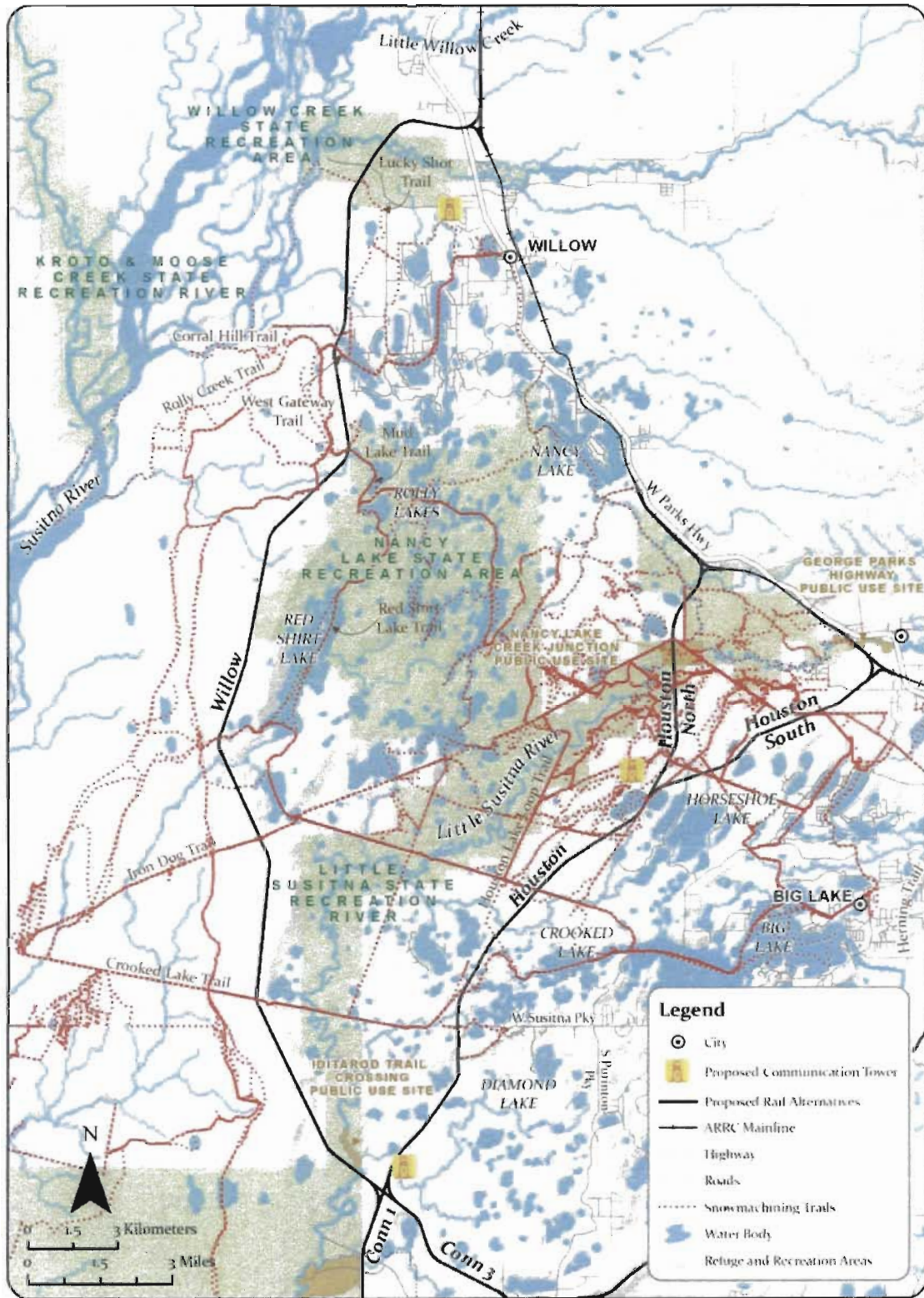


Figure 13.2-5. Snowmachining Trails along the Willow, Houston, Houston North, and Houston South Segments

C. WETLANDS

The Surface Transportation Board (SEA) independently verified the wetland identification and classifications and found them to be acceptable for the purposes of this analysis. For purposes of the wetlands evaluation, the proposed Port MacKenzie Rail Extension project area is defined as the area within 500 feet on either side of the segments for a total width of 1,000 feet (HDR, 2008; HDR, 2010). The project area is about 20 percent wetlands. About one-fourth of the project area wetlands are forested, most of which are needleleaf forested wetlands, with broadleaf and mixed forested wetlands making up less than 1 percent of the project area. More than half the wetlands in the project area are scrub/shrub wetlands (59 percent), of which 42 percent are broadleaf scrub/shrub wetlands, 9 percent are needleleaf scrub/shrub wetlands, and 49 percent are mixed and other scrub/shrub wetlands. Emergent wetlands are less common in the project area, comprising about 11 percent. Five percent of the project area wetlands are classified as other waters, of which 23 percent are riverine waters and 32 percent are palustrine waters. This appendix describes the wetland classifications or the vegetation communities, soils, and hydrology patterns for wetlands in the project area; functional capacities identified for project area wetland classes; and wetlands within the 200-foot rail line right-of-way (ROW) of segments and associated facilities.

C.1 Wetland Classifications

C.1.1 Forested Wetlands

Broadleaf forested wetlands are uncommon in the project area, occurring at only a single field point (Figure C-1). This wetland type is dominated by an overstory of paper birch (*Betula papyrifera*) and black spruce (*Picea mariana*) with a mixed understory of thin-leaf alder (*Alnus tenuifolia*), Greenland Labrador-tea (*Rhododendron groenlandicum*), and prickly rose (*Rosa acicularis*). Wetland hydrology indicators observed include water marks, saturation, and hydrogen sulfide odor within the soil profile. The soil at the site consists of a histosol (soils composed primarily of organic material).

Needleleaf evergreen forested wetlands are one of the most abundant wetland types mapped in the project area, occurring across broad flat areas and in low-lying depressions (Figure C-2). Plant community characteristics include an overstory dominated by black spruce (*Picea mariana*), with an understory of Greenland Labrador tea, mountain cranberry (*Vaccinium vitis-idaea*), field horsetail (*Equisetum arvense*), thin-leaf alder, black crowberry (*Empetrum nigrum*), narrow-leaf Labrador tea (*Rhododendron subarcticum* Harmaja), and tundra dwarf birch (*Betula glandulosa*). Most needleleaf forested wetlands are either on histosols or on mineral soils with histic epipedons. Some soil test pits exhibit a strong sulfidic odor, indicating anaerobic conditions, and all of these sites have saturated soils within the top 12 inches. Other wetland hydrology indicators include presence of a high water table, micro-topographic relief, stunted or stressed plants, and surface water.

1,000 foot wetland analysis area

Approx. 600 feet wide



CODE ORDINANCE

By: Borough Manager

Introduced: 01/04/05

Public Hearing: 01/18/05

Public Hearing Continued to 02/01/05: 01/18/05

Public Hearing: 02/01/05

Amended: 02/01/05

Adopted: 02/01/05

**MATANUSKA-SUSITNA BOROUGH
ORDINANCE SERIAL NO. 05-011(AM)**

AN ORDINANCE OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY AMENDING MSB 15.24.030, COMPREHENSIVE PLAN AND PURPOSES, SPECIFICALLY TO INCLUDE THE JUNE 2003 MATANUSKA-SUSITNA BOROUGH RAIL CORRIDOR STUDY.

WHEREAS, the Transportation Advisory Board Resolution Serial No. 04-08, adopted November 17, 2004, recommends the inclusion of the June 2003 Matanuska-Susitna Borough Rail Corridor Study in the overall Matanuska-Susitna Borough Comprehensive Plan; and

WHEREAS, the Planning Commission Resolution Serial No. 04-06 adopted December 6, 2004, recommends the inclusion of the June 2003 Matanuska-Susitna Borough Rail Corridor Study in the overall Matanuska-Susitna Borough Comprehensive Plan.

BE IT ENACTED:

Section 1. Classification. Section 2 and 4 of this ordinance are non-code. Section 3 of this ordinance is of a general and permanent nature and shall become a part of the Borough code.

Section 2. Amendment of the Matanuska-Susitna Borough Rail Corridor Study, June 2003. At the February 1, 2005, the Assembly amended map C9, sheet 11 of the June 2003 Matanuska-Susitna Borough Rail Corridor Study, to move Corridor 3 one-quarter mile to the east.

Section 3. Amendment of section. MSB 15.24.030 is hereby amended to read as follows:

(G) The Matanuska-Susitna Borough Rail Corridor Study, June 2003 has been adopted by the commission and assembly (adopted by the assembly as amended) as part of the overall Matanuska-Susitna Borough Comprehensive Plan.

Section 3. Effective date. This ordinance shall take effect upon adoption by the Matanuska-Susitna Borough Assembly.

ADOPTED by the Matanuska-Susitna Borough Assembly this 1 day of February, 2005.

/S/

TIMOTHY L. ANDERSON, Borough Mayor

ATTEST:

/S/

MICHELLE M. MCGEHEE, CMC, Borough Clerk

(SEAL)

PASSED UNANIMOUSLY: Woods, Allen, Colberg, Kvalheim, Simpson,
Colver, and Vehrs

Matanuska-Susitna Borough Code**TITLE 15: PLANNING****CHAPTER 15.24: ASSEMBLY: ZONING FUNCTIONS****15.24.030 COMPREHENSIVE PLAN AND PURPOSES.**

in accordance with the authority contained in A.S. Title 29 and in accordance with the procedures contained in MSB Title 43.

- (E) The Matanuska-Susitna Borough Community Health Plan, 1997, has been adopted by the commission and assembly as part of the overall borough comprehensive plan.
- (F) Point MacKenzie Port Master Plan, January 1998, amended May 1999, has been adopted by the commission and assembly as part of the overall borough comprehensive plan.
- ✓ (G) The Matanuska-Susitna Borough Rail Corridor Study, June 2003, has been adopted by the commission and assembly (adopted by the assembly as amended) as part of the overall Matanuska-Susitna Borough Comprehensive Plan.
- (Ord. 09-060(AM), § 3, 2009; Ord. 09-063, § 3, 2009; Ord. 08-162, § 3, 2008; Ord. 08-138, § 2, 2008; Ord. 08-089, § 2, 2008; Ord. 08-080, § 3, 2008; Ord. 08-073, § 3, 2008; Ord. 08-042, § 3, 2008; Ord. 08-030, § 2, 2008; Ord. 08-019, § 3, 2008; Ord. 08-006, § 3, 2008; Ord. 07-174, § 3, 2007; Ord. 07-131, § 2, 2007; Ord. 07-070, § 4, 2007; Ord. 07-035, § 3, 2007; Ord. 07-024 (AM), § 3, 2007; Ord. 07-020, § 2, 2007; Ord. 07-011, § 2, 2007; Ord. 06-183, § 2, 2005; Ord. 06-107, § 3, 2006; Ord. 06-098, § 3, 2006; Ord. 06-079, § 3, 2006; Ord. 06-074(AM), § 3, 2006; Ord. 06-057, § 2, 2006; Ord. 06-039, § 3, 2006; Ord. 06-019, § 3, 2006; Ord. 06-018, § 3, 2006; Ord. 06-001, § 2, 2006; Ord. 05-191, § 2, 2005; Ord. 05-174, § 2, 2005; Ord. 05-158, § 2, 2005; Ord. 05-150, § 2, 2005; Ord. 05-063, § 3, 2005; Ord. 05-011 (AM), § 3, 2005; Ord. 04-193, § 3, 2004; Ord. 04-145, § 3, 2004; Ord. 04-139, § 3, 2004; Ord. 02-202, § 3, 2002; Ord. 02-194, § 2, 2002; Ord. 01-188, § 3, 2001; Ord. 01-095, § 2, 2001; Ord. 01-078, § 2, 2001; Ord. 00-176, § 3, 2000; Ord. 00-048, § 3, 2000; Ord. 00-030, § 3, 2000; Ord. 00-005, § 3, 2000; Ord. 99-150, § 3, 1999; Ord. 99-095, § 2, 1999; Ord. 99-084, § 3, 1999; Ord. 99-071, § 2, 1999; Ord. 99-070, § 2, 1999; Ord. 99-066(AM), § 3, 1999; Ord. 99-054(AM), § 2, 1999; Ord. 98-139, § 3, 1998; Ord. 98-120, § 3, 1998; Ord. 98-119 (AM), § 3, 1998; Ord. 98-118, § 3, 1998; Ord. 98-117, § 3, 1998; Ord. 98-116, § 3, 1998; Ord. 98-111, § 3, 1998; Ord. 98-110, § 3, 1998; Ord. 98-52, § 2, 1998; Ord. 98-009, §§ 2, 3, 1998; Ord. 97-175, § 2, 1997; Ord. 97-122, § 3, 1997; Ord. 97-118, § 2, 1997; Ord. 97-117, § 2, 1997; Ord. 97-112, § 3, 1997; Ord. 97-110, § 3, 1997; Ord. 97-085, § 3, 1997; Ord. 97-076, § 3, 1997; Ord. 97-033AM, §§ 3—6, 1997; Ord. 96-170, § 2, 1996; IM 96-030, pages 1, 2, presented 11-19-96; Ord. 96-140, § 3, 1996; Ord. 96-097, § 3, 1996; Ord. 96-095, § 3, 1996; Ord. 96-094, § 3, 1996; Ord. 96-093, § 3, 1996; Ord. 96-038, §§ 2, 3, 1996; Ord. 95-163, § 3, 1995; Ord. 95-157AM, §§ 3, 4 (part), 1995; Ord. 95-136, § 3, 1995; Ord. 95-135AM, § 3, 1995; Ord. 95-087, § 3, 1995; Ord. 95-086AM, § 3, 1995; IM 95-006, pg. 4, presented 3-7-95; Ord. 94-096(sub1), § 2, 1994; Ord. 94-088AM, § 2, 1994; Ord. 94-071(sub1), § 4 (part), 1994; Ord. 93-144, § 2, 1993; Ord. 93-071AM1, § 2, 1993; Ord. 93-034, § 2, 1993; Ord. 93-001, § 2, 1993; Ord. 92-104, § 2, 1992; Ord. 91-080, § 2, 1991; Ord. 91-078, § 2, 1991; Ord. 73-5, § 3 (part), 1973)

Editor's Note:

MSB 15.24.030(B)(11) was repealed and recodified as MSB 15.24.030(D) by Ord. 97-033(AM), §§ 4 and 6. A new MSB 15.24.030(B)(11) was added by § 5.

15.24.031 INITIATING AND AMENDING LAKE MANAGEMENT PLANS.

- (A) The following process shall be followed to initiate a lake management plan.

Sponsored by: Assemblymember Bettine
Amended: 12/11/07
Adopted: 12/11/07

**MATANUSKA-SUSITNA BOROUGH
RESOLUTION SERIAL NO. 07-139 (AM)**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY REGARDING ADDITIONAL IMPORTANT SOCIAL, ECONOMIC, AND ENVIRONMENTAL ISSUES FOR CONSIDERATION DURING THE DEVELOPMENT OF THE SURFACE TRANSPORTATION BOARD'S (STB) ENVIRONMENTAL IMPACT STATEMENT OF THE ALASKA RAILROAD EXTENSION TO PORT MACKENZIE.

WHEREAS, the Alaska Railroad and the Matanuska-Susitna Borough are working cooperatively to study and construct a rail extension from the existing Alaska Railroad mainline to Port MacKenzie; and

WHEREAS, the work has been completed on the preliminary engineering and environmental analysis of the proposed rail corridors; and

WHEREAS, preliminary meetings and open houses have taken place to inform the public of the proposed rail line extension and to obtain comments; and

WHEREAS, the Assembly of the Matanuska-Susitna Borough has had limited time to consider the preliminary public and agency comments received to date as well as the results of the preliminary engineering and environmental analysis; and

WHEREAS, the Assembly of the Matanuska-Susitna Borough has conducted a work session on the proposed project to become more fully informed of the engineering and environmental issues related to the proposed project.

NOW, THEREFORE, BE IT RESOLVED, that the Matanuska-Susitna Borough believes the results of the preliminary reports and agency comments are incomplete and should be studied and reviewed during

the Surface Transportation Board (STB) process to a fuller extent;
and

BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly requests that the following social, economic, engineering, and environmental issues be more fully explored during the STB's environmental impact statement process. These issues being:

- The potential effects of the Castle Mountain fault, and other faults, on the proposed rail line.
- The potential effects of the rail line on drainage, particularly the drainage associated with the Big Lake watershed and Little Susitna River.
- The potential effects of future population growth, through the year 2025, on the proposed corridors and rail use along the proposed corridors for the communities of Willow, Houston, Knik-Goose Bay, Point MacKenzie, Big Lake Community Council area, and the Borough as a whole.
- The potential effects of future road and trail construction, through the year 2025, on the proposed corridors.
- The potential effects of noise and vibration generated by rail use along the proposed corridors on existing and future development.
- The potential effects of rail line use, along any of the proposed corridors, on future community development, with special attention to residential housing, commercial development, and other economic opportunities.
- The potential effects of the rail line on agriculture, recreation, and fish and wildlife along the proposed corridors.
- Preparation of future population estimates for both 20 year and 40 year time horizons and review of related impacts.

ADOPTED by the Matanuska-Susitna Borough Assembly this 11 day
of December, 2007.

/S/

CURTIS D. MENARD, Borough Mayor

ATTEST:

/S/

MICHELLE M. MCGEHEE, CMC, Borough Clerk

(SEAL)

PASSED UNANIMOUSLY: Woods, Houston, Church, Kvalheim, Bettine, and
Wells