

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

EI - 16393  
Rec'd 2/17/09

Dear Mr. Navecky,

Thank you for the opportunity to provide input and comments regarding the proposed Northern Rail Extension for the Alaska Railroad (Docket No. 34658). The Environmental Impact Statement (EIS) is a very long and involved document and requires careful reading. We do not feel that we have had enough time to really do justice to our comments or recommendations and have rushed through them in order to get them completed in time. Below are some of our thoughts and comments, but more time would have been better. In addition to providing these comments, we are requesting 60 day extension of the comment period. There are still many people who were not notified and/or did not see the notices in the newspaper about the meetings.

We have some serious concerns with several aspects of the EIS for the Northern Rail Extension (NRE) and what it might mean for the habitat and fisheries in the Tanana River watershed, particularly the Richardson Clearwater (RCW). While we realize there must be some loss of wilderness to extend the railroad, the level of what appears to be "acceptable losses" seems severe. Some areas of the EIS acknowledge problems, but seem to push for the extension without regard for reasonably possible consequences.

Our greatest concern with the proposed NRE is the Southern Common Segment (SCS) and the plans to bridge two streams that form part of the headwaters of the RCW. In *"Water Quality Study of Richardson Clearwater Creek Near Big Delta, Alaska"* (Public Data File 99-21), Mary A. Maurer describes the RCW as "a pristine spring-fed stream" that "is an unusual Interior Alaska stream because of its short length, laminar flow, stable channel, and exceptional clarity." The RCW headwaters are formed by numerous springs, the "largest of which contributes approximately 12 cubic feet per second of flow."<sup>1</sup>

In addition to the pristine waters, the RCW hosts a high number of benthic invertebrates (small organisms that are an important food source for fish including many recreationally and commercially important species).<sup>2</sup> Ms. Maurer states that, "Benthic invertebrate numbers are typically higher in Richardson Clearwater Creek than in other Interior Alaska streams" and goes on to report that due to the "higher and more consistent groundwater input" the "habitat conditions are optimal for benthic invertebrate colonization. "In addition, high water clarity, high dissolved gas content, and sufficient nutrient concentrations support abundant plant and animal life."

Descriptions of the proposed bridges are not readily available, but if they use the same construction methods as the bridges proposed to cross the Tanana River, it seems that there can be catastrophic consequences to the headwaters of the RCW. Assuming use of pilings for the bridge supports, the process of pounding the pilings into the gravel and substrate could damage the aquifers, limiting or changing the flow and output of the springs. Additionally, the compression of the initial pilings and vibration of train use of the trestles could continue to compress the aquifers feeding the springs and changing the rate and/or quality of the water output. If another type of bridge system is to be used for crossing the headwaters, we would like to know more about the design and placement that might be used.

While it can certainly be changed, the RCW area, according to the Tanana Basin Area Plan, has been proposed for legislative designation as a Critical Habitat Area. Furthermore, the current plan designates primary use as recreation, but specifies the need "to protect the water quality and habitat of the Richardson-Clearwater drainage and Rainbow Lake."<sup>3</sup>

Areas of the RCW very close to the proposed headwater crossings are used for recreation by many users. They are popular for fishing, hunting, trapping, camping, and access to Rainbow Lake. The area

of river near the "confluences" (where the major springs to be crossed enter the RCW) are a frequent starting point for rafting, canoeing, and float trips. The proposed crossings appear to be within ½ mile of the RCW itself and the noise from the trains would disrupt otherwise quiet, peaceful interactions with nature that are currently enjoyed.

The EIS identifies the crossing at three streams in the SCS and acknowledges the use of the RCW as an anadromous fish stream. Proposed mitigation takes into account some concerns (pollution, bank erosion, etc.) but does not answer the greater question of disruption of spring flow, continued compression due to vibration, and damage to the RCW due to inevitable sedimentation during the building process and for several years afterward.

While the EIS proposes that there will be very little hazardous materials shipped, they will be shipped none-the-less. Additionally, it can be assumed that, as with Fort Wainwright and Eielson, there will be shipments of oil and fuel. Any derailment of hazardous materials and fuels could be disastrous for the RCW, its tributaries, and drainages. The EIS proposes mitigations, but those obviously must take place after the fact. While linings and absorbing materials may be of great use as an end result, they would not be deployed quickly enough to prevent serious damage.

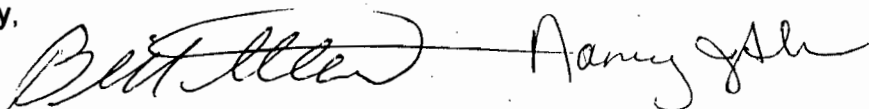
It seems that a more direct, shorter, and less critical route would be to run the NRE at or near the Donnelly Training area directly to Delta Junction and/or directly to Fort Greely. While this route may increase construction costs somewhat, it would be more solid by avoiding more permafrost, swamp, and wetlands than the current proposal. Moving the route south would allow continued use of the area by recreational users and hunters without creating trespassing issues for those who want to hunt and fish the Koole and Rainbow Lake areas. Moving the route south would increase the availability of Military lands for use and access by the Armed Forces. And finally, it would save potential devastation of the RCW, its headwaters, and drainages.

Please consider our thoughts and concerns. Thank you again for the opportunity to provide input. We will email our comments and a hard copy will follow in the mail.

Sources:

1. Division of Geological and Geographical Surveys—Public-Data File 99-21. Water Quality Study of Richardson Clearwater Creek Near Big Delta—Mary A Maurer, March 1999.
2. Ace Basin Biological Resources <http://www.dnr.sc.gov/marine/mrri/acechar/benthic.htm>
3. Alaska Department of Natural Resources: Tanana Basin Area Plan for State Lands updated 1991. Primarily Chapter 3-Subregion 7  
[http://dnr.alaska.gov/mlw/planning/areaplans/tanana/pdf/tanana\\_basin\\_area\\_plan\\_for\\_state\\_lands.pdf](http://dnr.alaska.gov/mlw/planning/areaplans/tanana/pdf/tanana_basin_area_plan_for_state_lands.pdf)

Sincerely,



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