

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

EI-17943

SARAH PALIN, GOVERNOR

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

February 17, 2009

RE: Draft Environmental Impact Statement Alaska Railroad Corporation Construction and Operation of a Rail Line between North Pole and Delta Junction, Alaska

The Alaska Department of Natural Resources (ADNR) in cooperation with the Department of Fish and Game (ADF&G) reviewed the Surface Transportation Board's (STB's) Draft Environmental Impact Statement (DEIS) for the Alaska Railroad Corporation's (ARRC's) Northern Rail Extension (NRE) project. In general, ADNR supports development of the railroad extension and its potential to provide opportunities for the residents of the state, including benefitting the local timber industry and general economy of the area. We are pleased to note that many stipulations in the DEIS are designed to protect the interests and safety of local residents and to safeguard the environment. We continue to have concerns regarding public access across the proposed rail line for hunting, trapping, fishing, and general recreation, in addition to access for economic purposes. We also continue to have concerns regarding potential impacts to fish habitat and moose.

Our comments focus on issues we believe the STB has inadequately addressed and are based on comments provided during our review of the Preliminary DEIS submitted as a cooperating agency for the preparation of the EIS. Included in the general and page-specific comments below are mitigation measures that ADF&G and ADNR consider appropriate for addressing project impacts.

GENERAL COMMENTS

In general, many of our concerns raised in response to the preliminary DEIS remain. Many fundamental statements about environment and land use impacts are buried throughout the document and should be consolidated in the summary section. Incomplete and inaccurate information is noted in the page-specific comments section of this letter. The DEIS does not adequately address public access issues. Additional or amended mitigation measures as proposed by the ADNR Division of Mining Land and Water, ADNR Division of Forestry, and ADF&G are necessary to ensure continued access to state resources, trails, and to and along public and navigable waters.

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."

Consistent with its statutory mandates, ADF&G examined the DEIS for identification, evaluation, and mitigation of potential project effects on fish and wildlife resources, their habitats, and their uses. ADF&G found significant deficiencies, particularly in addressing the project impacts and mitigation measures for moose and fish that were identified in scoping comments previously submitted to the STB. ADF&G concerns can be viewed as focusing on passage for moose, passage for fish, and passage for users. Passage for moose includes not impeding their natural movement patterns to important habitats, and not striking them with railroad vehicles when they are crossing the NRE. Passage for fish includes installing crossing structures that do not impede fish movements, and building the project so it does not affect the quality or quantity of the water that facilitates such passage and provides important habitats. Passage for users includes accommodating safe transit across the NRE for all identified routes, and provision for future access to public trust resources including fish and wildlife.

ACCESS

An important weakness noted during our review is that the DEIS (such as in 13.1.3) does not accurately represent the significant land management and impacts differences between ARRC acquiring a right-of-way interest on BLM-managed federal lands and the ARRC acquiring title to state land under AS 42.40.460, and that it continues to confine its analyses of direct impacts to those strictly within the project area rather than identifying the full suite of potential project impacts that could directly result from the proposed changes to land use, land management authority, and land ownership. The result is that access to the full range of state resources (including fish and wildlife) could be compromised by the NRE.

The DNR is revising its Tanana Basin Area Plan and new settlement areas will be identified for offering over the next twenty years. Many of these settlement areas are adjacent to prior offerings, and there is interest in new areas. Typical Alaskan remote land purchasers use adjacent state land extensively for subsistence and recreation, and require practical legal access to and through this area. The DNR statewide land sales programs are very active, with many new subdivisions and remote staking areas planned for the sale to the public in the next 5 years. Some of these projects, in various stages of development, may be located near the proposed routes, or will be accessed by roads and/or trails which have not yet been documented. It is imperative that the public be able to cross the ARRC right-of-way to access future land sale projects and other state lands.

The areas of primary concern within the proposed project area are those State lands south of the Tanana River, between the Tanana Flats Training Area and the Delta River. There are existing land disposal projects within this area, and the potential for future disposal areas. There are several serialized trails through the area, such as: ADL 409488, ADL 415320, ADL 415270, and RST 64. In addition to serialized trails, there are many trails established through traditional and generally allowed uses, which provide access to and through the area. It is important to protect

the legal and practical use of these access routes. ADNR requires continued legal and practical access along these routes.

To avoid such impacts, accommodation must be made for all existing access across the NRE corridor (including both serialized and generally allowed use trails), and a mechanism such as retention of section line easements needs to be put in place to allow for future access across the corridor as appropriate. We recommend that the STB decision process incorporate the issue of continued legal and practical public access. This process should also incorporate provisions for access not yet associated with a specific route, and contain provisions for dealing with future road or trail construction.

FISH HABITAT

The mainstem, side channels, and sloughs of the Tanana River provide important habitat for a variety of anadromous fish species. In particular, work published by Barton (1992) and affirmed by several other ADF&G studies (including radio-tagged fish in the falls of 2007 and 2008) document the use of mainstem and side channel locations for spawning by fall chum salmon. To avoid and minimize NRE effects on these fish resources, ADF&G has consistently stated the need for maintenance of stream flows through, and bridge crossing structures over, the main side channels at both Tanana River crossing alternative locations. Filling these side channels would result in burial of habitat and at least partial dewatering of several side channels documented as used by salmon, and the ADF&G will be looking for alternative designs from the ARRC for the chosen crossing location during future permitting actions.

As described visually and orally to the ARRC and STB during initial meetings regarding the NRE, and as noted in scoping comments, "The greatest potential mitigation measure to reduce project effects on fish populations is to avoid the Tanana River floodplain because of its multiple highwater and clear runoff channels, spawning and rearing habitat, and tributaries systems." ADF&G stands by this position. Much of the ARRC's preferred alternative between Flag Hill and the Little Delta River crosses very important floodplain habitat, and ADF&G advocates for the alternative alignment on the bench for that reason. The alternatives chosen by the STB for analysis between Delta Creek and the Delta River do not provide for avoidance of important anadromous and resident fish habitat. ADF&G continues to advocate for the proposed alignment (old S 1b) up on the bench near the Delta Creek Road rather than the south common segments. The ARRC has said that geotechnical information leads them to question these alignments preferred by ADF&G but no data have been provided to date. Without availability of adequate geotechnical information (an adequate density of bore holes drilled to a depth well below those directly affected by construction), ADF&G cannot make an informed decision that balances the identified fish and fish habitat resources of the floodplain areas with the perceived difficulties of building beyond the floodplain.

Because of the incomplete resource survey information (particularly for rearing fish in smaller floodplain channels), and the paucity of geotechnical information available for the NRE project

area, ADF&G believes that the time is not yet ripe for delineation and adjudication of a definitive alignment for those portions of the NRE east of Flag Hill. This is particularly true for the lowlands and benchlands near the Fivemile Clearwater and Richardson Clearwater rivers. ADF&G anticipates significant ongoing discussions, surveys, and information sharing with the ARRC before ADF&G can adequately evaluate and balance the potentially competing beneficial uses of these lands and concur with selection of a specific, binding alignment corridor.

MOOSE

The DEIS analyses of moose movements and use areas appear to rely upon short-term surveys and misunderstandings of the years of data collected and published by ADF&G wildlife biologists. ADF&G moose census and movement information continues to affirm the movement and density patterns presented by Gasaway et al. (1983). Approximately half of the moose in the project area are residents of the Tanana Flats, making relatively short seasonal movements near and along the west side of the NRE project area to allow access to a variety of habitats including emergent and aquatic summer feeding areas, woody thermal cover, and willow-rich winter feeding areas. The other half of the moose population overwinters in the Chena and Salcha river basins, and to a lesser extent the northern foothills of the Alaska Range, and migrates seasonally to the wetter portions of the flats for calving and summer feeding. Moose from the Salcha basin in particular would have to cross the NRE area twice annually to get between their summer and winter ranges. Although the primary calving area is slightly west of the project area, the potential for interactions between the NRE and both resident and migratory moose is quite significant, particularly since the moose population using the area is very high. Since this population is mandated by statute for intensive management including high productivity and high human use, every moose counts and a requirement to implement effective mitigation measures to avoid, minimize, rectify, reduce, and compensate for losses to moose habitat and moose lives must be incorporated into the final EIS.

FORESTRY

Of the alternatives analyzed, the Salcha 1/Central Alternative 1/Donnelly 1 alignment route impacts the least amount of commercial forest land. The Salcha 2 Alternative passes through higher value spruce saw timber within the Tanana Valley State Forest and would be located on numerous actively eroding islands. The Donnelly 2 route would be located on higher value spruce saw timber on forest classified state lands and stands laid out for harvest.

DOF supports mitigation measures that provide crossings of trails as indicated in item 62 on page 20-21 of the DEIS.

The ADNR winter trail west of the Little Delta River is also used for commercial timber sale access. Crossings should be wide enough to accommodate commercial logging trucks.

DOF requests the use of any service road and bridge access. If road access points are gated, DOF requests keys or lock combinations. Road and bridge access will facilitate fire suppression needs and/or timber harvest operations.

Salvage of commercial and personal use timber is addressed in Mitigation Measure 66. DNR has proposed additional language for this measure in Attachment 1. Un-merchantable timber should be properly processed to avoid potential spruce bark beetle infestations. Opportunities for commercial and biomass timber harvest may be present and the ROW timber should be utilized. In the Little Delta River area the 200 foot ROW would clear approximately 124 acres of commercial timber. The less desirable Donnelly 2 route would clear approximately 389 acres of commercial timber.

The DEIS states that sidings would be present at several locations. The Donnelly 1 route passes through and adjacent to numerous mixed spruce/hardwood stands between Five Mile Clearwater River and the Little Delta River. If a rail siding located was located in this area it could be utilized for transporting wood products.

The DNR Delta DOF submitted comments specific to forestry issues east of the Little Delta River directly to the STB on February 4, 2009. These comments are included in Attachment 2 of this letter.

PAGE SPECIFIC COMMENTS

Chapter 1 Purpose and Need for Action

1-6 Please note that though the information provided in the DEIS is useful, the DEIS is not a permit level document and additional information and process will be required for state permits as well as the ADNR process for implementing AS 42.40.460

Chapter 5 – Biological Resources

5-6 5.2 In the paragraph at top of page, include importance of some glacial rivers as migratory corridors, and for spawning by some species in nonturbid seasons. Arctic grayling spawn in the spring, so their eggs are not present in spring-fed areas over winter.

5-31 5.4.1 Here and where else it occurs throughout the DEIS, change “recreational fisheries” to “sport fisheries” to be consistent with statute and other portions of the document.

5-33 Fig 5-10 Correct the legend, changing 16.15.871 to 16.05.871.

5-35 5.4.2 Discussions about hyporheic flow and sedimentation in the Alterations of Stream Hydrology and Breakup paragraph should include an explanation that the flow is necessary to maintain movements of oxygen to and waste products from developing egg and that filling in by sediments would suffocate eggs.

Chapter 7 Subsistence

7-5 states "Alaska does not regulate the taking of non-game resources such as berries, medicinal plants, or wood." This is incorrect; DNR issues permits for non-timber forest products, and there is certainly wood and timber harvest regulation.

Chapter 10 – Energy Resources

Page 10-3, it states that in the Delta Junction area, the Alaska Railroad Corporation (ARRC) "would have to closely coordinate all construction activities with the Alyeska Pipeline Service Company (APSC) and would adhere to all industry standards to ensure safety and minimal disruption to pipeline operations"... The ARRC would have a "grade separate design of the pipeline crossings" to prevent impacts to TAPS. They don't anticipate any distribution disruption to TAPS or "long or short-term effects on pipeline safety as a result of proposed rail line construction or operation."

If this project is constructed with railroad crossings of TAPS, it will be the first time. We recommend that the ARRC acknowledge the need for close coordination with the Joint Pipeline Office and APSC during the planning, construction, and operation of the project. The current APSC contacts include the Agency Liaison - Joe Robertson (787-8061), the Gas Pipeline Coordinator - Nathan Brock (787-8996) and the Lands Manager - Peter Nagel (787-8170).

Chapter 12 - Navigation

Please note in this chapter that the State of Alaska owns the beds of navigable waterbodies.

Chapter 20 – Mitigation

See attached table of mitigation measures recommendations (Attachment A).

Appendix D – Alternatives Development and Elimination

D-16 D.2.6 It appears that the SEA retained only a portion of the S1/Donnelly Central alignment. ADF&G continues to prefer analysis and licensing of the S1b/South Segment alignment that parallels the Richardson Clearwater River up on the bench near the Delta Creek Road.

Appendix F – Biological Resources

F-15 Table F-8 Clarify that Chinook salmon in the Tanana River basin can rear for 1-3 years in fresh water. There is no documentation of lake type coho salmon in the Tanana River basin.

F-24 F.2.4 The text in here and associated tables is too limited in its description of fish habitat in the Fivemile Clearwater River as a migratory corridor. The anadromous waters catalog specifies a significant area as coho salmon rearing, and a partially coincident large reach for Chinook salmon presence, with the particular reaches for Chinook rearing or spawning not currently delineated.

F-28 F.2.4 In the bottom paragraph, the chum salmon spawning noted should be for fall chum rather than summer chum.

Appendix G – Essential Fish Habitat

G-5 Table G-3 See comments on page F-15 Table F-8.

G-15 G.3.4 The sentence preceding Table G-8 appears to be incomplete.

G-15 G.3.4 The sentence at the top of the page needs to be expanded to include mainstem spawning by fall chum salmon as documented by Barton (1992) and as shown by 2007 and 2008 radio-tag location data from an ongoing ADF&G Division of Commercial Fisheries project (for on-line maps see Tanana Chiefs Conference web sites <http://gis.tananachiefs.org/maps/fishmap2007/viewer.htm> or <http://gis.tananachiefs.org/maps/fishmap2008/viewer.htm>). Alternatively, delete this paragraph or combine it with the following paragraph.

G-24 G.3.4 See comment for page F-28 section F.2.4.

Appendix I – Subsistence Methodology and Communities

I-12 I.2.7 ADF&G annual salmon subsistence reports by Division of Commercial Fisheries are available. Salmon are listed in Table 1 of each report (or the historical table in the back of the latest report through 2005, draft numbers are available through 2007) by community and by district. Harvests are shown for Nenana, Minto, and other Tanana River communities. Some tables provide subsistence harvest of non-salmon species as well. Harvests in these communities is naturally diminished because the fish quality is lower during full maturation and spawning. However, the origin (spawning areas) of these fish, particularly fall chum and coho salmon, is within the project area and larger harvests are taken by residents all the way to the mouth of the Yukon River.

Appendix M- Section 4(f) Evaluation

Please note that ADNR does not consider those state trails and lands listed in table M-1 to be 4(f) resources as they are not parks or refuges and are managed under the ADNR Tanana Area Basin Area Plan for multiple use, including economic purposes.

Appendix O ANILCA Section 810 Analysis

p. O-11, states that the proposed Alaska natural gas pipeline and Richardson Highway upgrades were "potential activities" that were considered in this DEIS but "were not analyzed in detail because they were not considered reasonably foreseeable at this time."

The ADNR/State Pipeline Coordination Office disagrees with this statement and believes that both an Alaska natural gas pipeline project and Richardson Highway upgrades are reasonable and foreseeable potential activities, although a specific gas pipeline route may not be available at this time. Additionally, another potential gas pipeline project along the Richardson Highway

involves a Beluga to Fairbanks route, currently under consideration by the Alaska Natural Gas Development Authority (ANGDA). More information about this project is available at the ANGDA website at: <http://www.angda.state.ak.us/>

This concludes our comments on the DEIS. Thank you for the opportunity to review the document and your continuing efforts to address potential impacts on public access and fish, wildlife, and timber resources in the area. Please contact me with any questions regarding these comments.

Don Perrin

/s/

Alaska Department of Natural Resources
Office of Project Management and Permitting

cc: Ed Fogels, ADNR/OPMP
Jim Durst, ADF&G/HABITAT
Chris Milles, ADNR/DMLW
Jeanne Proulx, ADNR/DMLW
Dianna Leinberger, ADNR/DMLW
Doug Hanson, ANDR/DOF
Steve Joslin, ADNR/DOF
Al Edgren, ADNR/DOF Delta Area Forester
Chris Maisch, ADNR/DOF State Forester
Mike Thompson, ADNR/SPCO

ATTACHMENT 1:

ADF&G/ADNR-recommended actions on NRE DEIS Chapter 20 Mitigation Measures

ADF&G/ADNR-recommended actions on NRE DEIS Chapter 20 Mitigation Measures, including those proposed as voluntary measures (VM) by the applicant and those identified by the SEA (numerals only). Comments on VMs are offered as changes that could strengthen the VMs to better avoid, minimize, rectify, reduce, or compensate for anticipated projects impacts. Comments on SEA measures are recommended edits to achieve the same goals. Gray cells indicate measures in which ADF&G does not have direct responsibility.

Mitigation Measure	Recommendation	Comment
20.2.1 Topography, Geology, and Soils		
VM-1	Retain	
VM-2		
1	Amend	Recommend replacing "shall not" with "avoid" and adding "where feasible" to the end of this sentence to enable bridge piers to be placed beyond riparian thaw bulbs and minimize disturbance to stream beds and banks.
2	Amend	Delete second sentence. Amend first sentence to read, "Applicant shall obtain all necessary permits from appropriate agencies to ensure that features of the rail line that would occupy areas of permafrost..."
3	Amend	Add " or specific requirements of the appropriate authorizing agencies"
20.2.2 Water Resources		
VM-3		
VM-4	Retain	
VM-5		
VM-6	Amend	An appropriate place to add avoidance of French draining as a goal to aid in maintaining natural flow and drainage patterns.
VM-7	Retain	
VM-8	Amend	Appropriate to flag 100-year flow as design discharge.
VM-9	Amend	Delete second-to-last sentence. Change "shall" to "may" in last sentence.
VM-10	Retain	
VM-11	Amend	Change "avoid" to "not."
VM-12	Retain	
VM-13	Amend	Delete "overly."
VM-14	Amend	Should 2nd bullet include access road? Add to 3rd bullet material that is not acid-producing or with an

		elevated chemical oxygen demand.
VM-15	Amend	Delete clause beginning "for crossings within," and add "Permanent" in front of "drainage crossing."
4	Amend	Change 2nd bullet to allow for floodplain material sites if approved on a site-specific basis by ADNR and ADF&G. Add a bullet noting that, notwithstanding the points noted above, all siting, design and development of railroad line facilities, staging areas, access roads, etc. must be coordinated and authorized according to the specific requirements of DNR or the appropriate authorizing agency. Such permitting may result in site-specific practices or stipulations which vary from the general guidelines noted here.
5	Retain	
6	Amend	Add "or other specific practices/ requirements identified by DNR or appropriate authorizing agencies."
7	Retain	
8	Retain	
9	Retain	
10	Amend	Apply 100-year discharge as design flow to all bridges and culverts.
11	Retain	
12		
13		
14		
15	Retain	
16	Amend	See comment for mitigation measure #4
17	Retain	
18	Retain	
19	Retain	
20	Retain	
21	Amend	Revise first line to "Construction of temporary crossings shall be accomplished in a manner that minimizes disturbances to stream bed, banks, and flow. Measures to meet these goals could include installing bridge piers..." Also see comment for mitigation measure #4
22	Amend	See comment for mitigation measure #4

23	Amend	See comment for mitigation measure #4
24	Amend	See comment for mitigation measure #4
25	Amend	See comment for mitigation measure #4
26	Amend	See comment for mitigation measure #4
27		
28		
20.2.3 Biological Resources		
VM-16	Retain	
VM-17	Retain	
VM-18	Amend	Change "where practicable" to "as permitted."
VM-19	Retain	
VM-20	Retain	
VM-21	Retain	
VM-22	Retain	
VM-23	Retain	
29	Retain	
30	Retain	
31	Retain	
32	Retain	
33	Retain	
34	Amend	See comment for mitigation measure #4
35	Retain	
36	Retain	
37	Retain	
38	Retain	
39	Retain	
40	Retain	
41	Retain	
42	Retain	
43	Amend	Change the text before the bullets to "The Applicant, in consultation with the Alaska Department of Fish and Game and the Alaska Department of Natural Resources, shall evaluate, implement, and monitor aspects of rail design, maintenance, and operations to document and reduce moose-train mortality. Such measures may include:"
44	Retain	
45	Retain	
46	Retain	
47	Retain	
48	Retain	
20.2.4 Cultural Resources		

VM-24		
VM-25		
49		
20.2.5 Subsistence		
50	Amend	Winter use is not necessarily the lowest for a particular area. Consider changing to "...trails and waterways to occur during times of limited use or when alternate routes are most available."
20.2.6 Climate and Air Quality		
VM-26		
VM-27		
20.2.7 Noise and Vibration		
VM-28		
51		
52		
20.2.8 Transportation		
VM-29		
VM-30		
VM-31		
VM-32		
VM-33		
VM-34		
VM-35		
20.2.9 Navigation		
VM-36	Retain	
VM-37	Retain	
53	Retain	
54	Amend	Add "and travel by winter modes of transportation (snow machine, dogsled, etc.)" after "recreational boat users."
	Add New	The Applicant shall ensure that bridges and culverts placed on navigable or public waters, as determined by the Alaska Department of Natural Resources, are designed and installed to accommodate public access and use of the statutory (AS 38.05.127) easements.
20.2.10 Land Use		
VM-38		
VM-39		
VM-40		
VM-41		
VM-42		
VM-43		
VM-44		

VM-45	Retain	
VM-46		
VM-47		
VM-48		
VM-49		
VM-50		
VM-51		
VM-52		
55	Amend	Add "the Applicant's final plan shall comply with all requirements and conditions as determined by DNR through the process and decision under state statute, AS 42.40.460."
New	New	In design and use of rail access and maintenance roads, the Applicant shall consolidate such routes with other resource development roads to the extent feasible, in order to avoid creating a network of parallel transportation routes.
56	Retain	
57	Amend	Delete "use caution to" from last sentence.
58	Amend	Include effects on stocked fish in these water bodies and future ADF&G stocking plans. Add "and appropriate mitigation measures" to end of 1st sentence.
59	Amend	Include effects on stocked fish in these water bodies and future ADF&G stocking plans.
60	Amend	Change the first sentence to, "...consult with the appropriate management agencies, including the Alaska Department of Natural Resources and the Alaska Department of Fish and Game, to provide..."
61	Amend	Add Alaska Department of Fish and Game to the list of agencies to be consulted. Delete "legal" from the sentence.
62	Amend	Change beginning to "The Applicant shall, in collaboration with applicable resource management agencies, provide crossings ..."
63	Amend	Begin the sentence with "The Applicant shall, in collaboration with applicable resource management agencies, make provision for crossings of the following trails: ..." and end it with "...; and the 'Important Trails in the Planning Area' listed in the Tanana Basin Area Plan."
64	Retain	
65	Retain	

66	Amend	On state and private land, the ARR shall consult with the Division of Forestry to determine commercial and personal use timber within the right-of-way for salvage or disposal per the Forest Practices Act and the Tanana Valley State Forest Management Plan objectives. Timber salvaged or disposed of must comply with AS 41.17.082 Control of Infestations and Disease.
67		
68		
20.2.11 Visual Resources		
69	Amend	Modify the 3rd bullet to apply only when appropriate given access and safety considerations.
70		

ATTACHMENT 2:

ADNR Delta Division of Forestry Comments

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF FORESTRY

SARAH PALIN, Governor

P.O. BOX 1149

DELTA JUNCTION, ALASKA 99737

PHONE: (907) 465-4430

FAX: (907) 465-3415

February 4, 2009

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

Dear Dave:

The State of Alaska, Delta Forestry Office is pleased to consider the possibility of a rail road coming to the Delta Area. A rail road could benefit the local timber industry and the general economy of the area. Our office submits the following comments to address issues located east of the Little Delta River.

In 1997-98 about 20 miles of timber sale roads were pioneered into the area between the Delta and Little Delta River. Except for this brief entry, our office has delayed development here for a multitude of reasons and focused elsewhere. However, this area is Delta's closest and most feasible wood source and will be used in the future to meet community and regional needs. The public school received a grant to construct and install a biofuel heating system, this area will be important as a fuel source. Attached is a recent Forest Land Use Plan for a proposed timber sale in response to the Schools plan to use biofuels, it overlaps the railroad alignment near the Delta River.

Please see the attached map and shapefile showing road crossings that would be required if the rail road is constructed. In a 37 mile rail road segment between the Little Delta and Delta River, there would be 8-9 all-season road crossings, depending upon which route is selected. These proposed crossings would accommodate existing and future development for logging, mining, agriculture and other potential traffic. I did notice that the crossings happened to fall on bends in the rail road. If the crossings need to be changed please consult with our office.

We would like to see rail road sidings located in the area that could be used to load logs, coal, and other resources. The Delta Area exported thousands of logs on the rail road through North Pole and Fairbanks in the past, we hope to export logs and manufactured products in the future. There are large coal deposits in the Delta Area; several are located south of the proposed rail alignment in the Little Delta River and Delta Creek drainages. Please see the attached map showing a proposed rail road siding near the Delta River. We would like to see additional sidings for timber in the future at Delta Creek and Little Delta River.

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."

Our agency would like to get permission to utilize any service roads or bridges for state business to include commercial timber sales and wildland fire suppression. We are especially interested in getting all-season access across the Delta River. Single lane roads and bridges with locked gates would be acceptable.

There is a significant amount of hunting and trapping in the area and it would be necessary to allow pedestrian and light all terrain vehicles to have unrestricted access to cross the rail road.

Please let our office know of any adjustments to the final alignment located east of the Little Delta River. Based upon the final rail road alignment there may be adjustments to proposed crossings as well as additional comments or recommendations. We look forward to working with you on this project.

Thank You,



Al Edgren
Delta Area Forester

Cc: Chris Maisch, State Forester
Don Perrin, DNR, ML&W

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."
