



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

March 18, 2009

Kathryn Kusske Floyd, Esq.
Mayer Brown LLP
1909 K Street, NW
Washington, D.C. 20006

Re: STB Finance Docket No. 34658, The Alaska Railroad Corporation – Petition for Exemption to Construct and Operate a Rail Line Between North Pole and Delta Junction, Alaska

Dear Ms. Floyd:

Consistent with 40 CFR § 1506.5(a), we request additional information needed for the Section of Environmental Analysis' on-going environmental review in connection with the above-referenced proceeding. In order to respond more fully to comments on the Draft Environmental Impact Statement (EIS), we are requesting the following information:

1. Please provide additional explanation on the anticipated poor geotechnical conditions and other factors, if any, which led ARRC to reject alignments in the area to the southwest of the South Common Segment.
2. Please provide further explanation on the terrain considerations and other factors, if any, which would make it impractical to connect Central Alternative Segment to Donnelly Alternative Segment 2 near Connector E (see Figure 2-8 in the Draft EIS).
3. Would the footprint of a Tanana River bridge be different from what is presented in the Draft EIS if it were a rail-only bridge rather than a dual-modal bridge? If yes, please explain the differences.
4. If no military use of the Tanana River bridge were anticipated, would ARRC propose a dual-modal bridge? Would ARRC propose separate track and vehicle bridges over the Tanana River in the absence of any military use?
5. Clarify why a dual-modal (i.e., single) bridge is proposed over the Tanana River, whereas separate track and vehicle (i.e., two) bridges are proposed for Little Delta River and Delta Creek?
6. Please provide additional new information, if any has become available, on the anticipated uses of the proposed rail line.
7. The access road to communication tower "Site B" is described as connecting to the ADNR winter trail. Would ARRC require road access to Site B only during the winter months, or would ARRC upgrade the ADNR trail?
8. Please provide an explanation of why several proposed bridges and culverts would be narrower than the width of the channel (e.g., crossings 13, 85, 27, 344, 396, 40, and 252). Would these crossing structures be able pass the 100-year flood flow? Would these

- crossings be designed to maintain existing water patterns and flow conditions as much as practicable? Were other designs considered?
9. Please provide further explanation of the development of the anticipated average daily freight and passenger rail traffic presented in the Petition for Exemption.
 10. Does ARRC anticipate that it would need to expand the quarry at Curry, Alaska to support construction of the proposed rail line and associated facilities? If so, please describe the expansion that would be required.
 11. Would ARRC grant permission for Alaska Department of Forestry to use access roads and vehicle bridges for state business to include timber harvest and wildland fire suppression?
 12. Please specify which trails or categories of trails, if any, that ARRC would voluntarily provide crossings. For example, for the Port MacKenzie project, ARRC has volunteered to grade separate officially recognized trails and ARRC defined an "officially recognized trail as a trail located on a formally dedicated easement or on public land on which the MSB or the state has indicated to the project team that there is intent to dedicate an easement."
 13. If ARRC volunteers to provide trail crossings, please specify, to the extent known, which trail crossings would be grade separated and which trail crossings would be at grade.
 14. In comments on the Draft EIS, ARRC states that a 24-foot wide access road would be needed on the south (west) side of the Tanana River, in part, to accommodate 18- to 20-foot wide construction vehicles. Please clarify how these large vehicles would reach the construction area (e.g., the proposed dual-modal bridge over the Tanana River would be less than 15 feet wide). Would the vehicles be assembled/disassembled as needed? Would ice bridges be required to move them from one side of the river to the other?
 15. Why did ARRC propose to relocate Salcha School rather than relocate Richardson Highway farther to the east, and therefore, avoiding the need to relocate the school?

We look forward to receiving this information. In addition to Dave Navecky of my staff, please provide a copy of your response to Mr. Alan Summerville of ICF International, our independent third-party contractor at 9300 Lee Highway, Fairfax, Virginia, 22031. Please contact Dave Navecky at 202-245-0294 if you have any questions. Thank you for your assistance.

Sincerely,



Victoria Rutson
Chief
Section of Environmental Analysis