



FAIRBANKS NORTH STAR BOROUGH

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EI-17873

June 17, 2009

David Navecky, SEA Project Manager
Section of Environmental Analysis
Office of Economics, Environmental Analysis and Administration
Surface Transportation Board
Washington DC 20423

Re: STB Docket No. 34658- The Alaska Railroad Corporation

Dear Mr. Navecky,

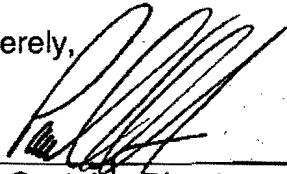
We are responding to your request for our concurrence to the *DeMinimis* Impact Finding for the Salcha Elementary School and Ski Area. We do not concur to this finding for the following reasons:

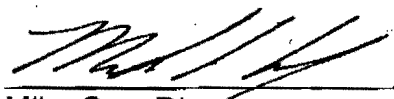
1. The Salcha School, playground and ski trails are inextricably linked together in our eyes and that of the local community. The playground has been there since the school was built. The trails were put in with a lot of volunteer help and are well known as a community asset, linked in functionality and in perception, as part of the Salcha School and Community. Reconstructing the school in a new location would separate it from what would be left of the trail system. We believe the Salcha community would vehemently object to such an action.

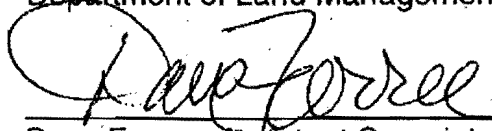
2. As a practical matter, the trail system cannot be partially relocated or modified without the entire system being re-constructed. To change the configuration by the school changes the mileage of the trails and in order to adapt to this change other loops would have to be added in locations at the far end of the system, not a practical or effective result.

Thus, in our eyes the proposal is far from *de minimus*. Thank you for considering our position.

Sincerely,


Paul Costello, Director
Department of Land Management


Mike Cox, Director
Department of Parks and Recreation


Dave Ferree, Assistant Superintendent,
Facilities and Management