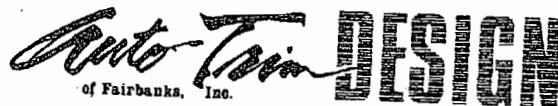


DRAFT list of the Vincent's comments so far—we'll find more, but this is a start. Feel free to use them all or in part when preparing your own comments and let us know what we have missed that we can add to these. The more info we can provide, the better.

We are concerned about how the Northern Rail Extension project may affect our property; the 40 property owners on Fivemile Clear Creek (referred to in the report as Fivemile Clearwater River); the creek itself; hunting, fishing, and recreation for all property owners and users in the area; and access to properties and hunting grounds in the area of the creek. The comments we are providing are in regards to the Tanana River crossing near Salcha, the Central Alternatives 1 and 2, and the associated connectors. Specifically, our comments are:

1. Figure 2-17, Tanana bridge Alternative 2, shows a channel blocked with "fill" on the west side of the Tanana to accommodate the bridge. This is the channel that is used to access the mouth of Clear Creek. Creek flow would not likely be enough to maintain navigability as it spreads over the wide channel bed, so blocking Tanana flow to this channel would cut off summer access to the creek and the 40 properties on it. There is no other reasonable summer access to the creek. Additionally, in reference to this same figure, are concerns about what impact this will have to the fish population on the creek. The grayling migrate annually, and there are annual salmon runs. This alternative could be detrimental to both, thereby leading to serious environmental concerns further up the food chain.
2. a. Figure 13-33 shows one allowable crossing of railroad line near the headwaters of the creek and one near the mouth of the creek. According to this Draft EIS, crossing the railroad line will not be allowed in other locations. This cuts off winter access to most properties on the creek. The creek doesn't freeze in the winter, so the creek cannot be used as a trail from the crossings upstream or downstream to the properties. Landowners have built their own winter trails where they are needed to access their properties. Drawing a line across these cuts off their winter access to their properties.
 - b. Central Alternative 1 and 2 (and associated connectors) draw lines across prime hunting areas and access to other areas that cannot be crossed for hunting. There are existing trails that cross the proposed line locations. Many of us built our cabins out there for hunting, but rail lines will greatly reduce that area that can be hunted.
 - c. ADNR regulations allow for the construction of the above-mentioned trails (Draft EIS p.13-25) and has stated they "... would require accommodation of these legal features." yet the railroad has not addressed how they intend to resolve this conflict. In fact, the Draft EIS states that "In roadless area, off-road vehicles would be prohibited from crossing the rail line at non-designated points." (Draft EIS p.13-25). Resolution to this conflict should be proposed in this Draft EIS so that the public has the chance to comment on it.

3. Note that the creek is used by jetboats and airboats. Bridges must be built with adequate clearance for the taller airboats.
4. I cannot find info in the Draft EIS on where a construction camp or construction storage area might be located in the Clear Creek area. This could have significant environmental impacts and a proposed location should be identified and addressed in this document.
5. Note that construction closures of the creek and popular hunting grounds should be planned to not coincide with hunting season. People with property on the creek should be notified of such closures in advance, not when they get partway up the creek with a boatload of supplies and plans to spend a weekend at their cabins.
6. No noise and vibration analysis is included for this area as "... no receptors were identified near the proposed rail line." (page 9-6 of the Draft EIS). There are 40 privately owned properties on the creek, about 1/2 of which have cabins that are used regularly. There is also wildlife in the area that would be affected by the noise and vibration of 10 train trips through there per day. A noise and vibration analysis should be done for this area.
7. Between Clear Creek and the Tanana, behind the private properties, is a clear-running stream that sustains a salmon population and likely other fish. I cannot tell from maps provided if Alternative 2 affects this stream, but it should be considered. This is the area off military land.



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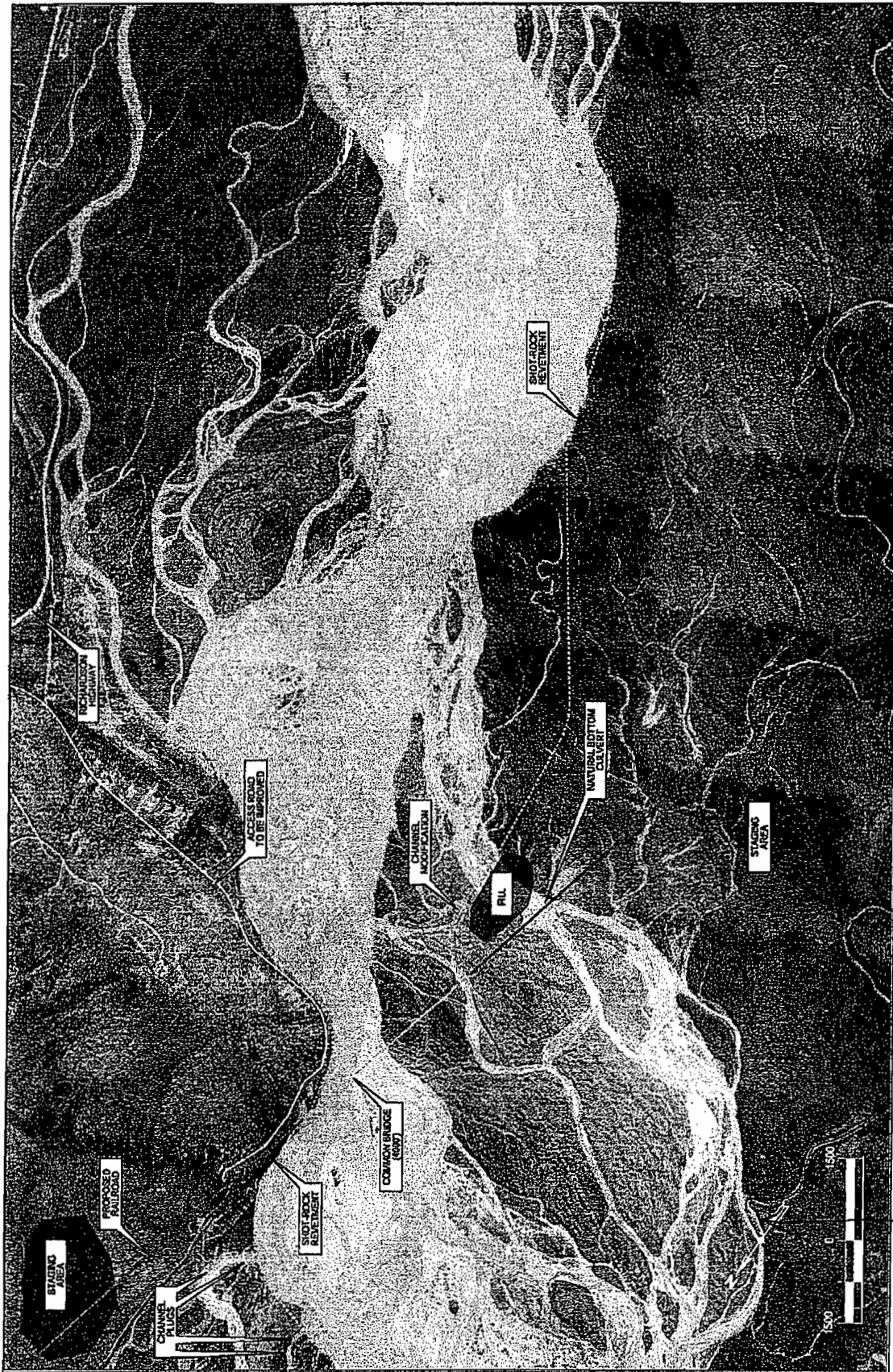


Figure 2-17 - Salcha Alternative Segment 2 Tanana River Crossing

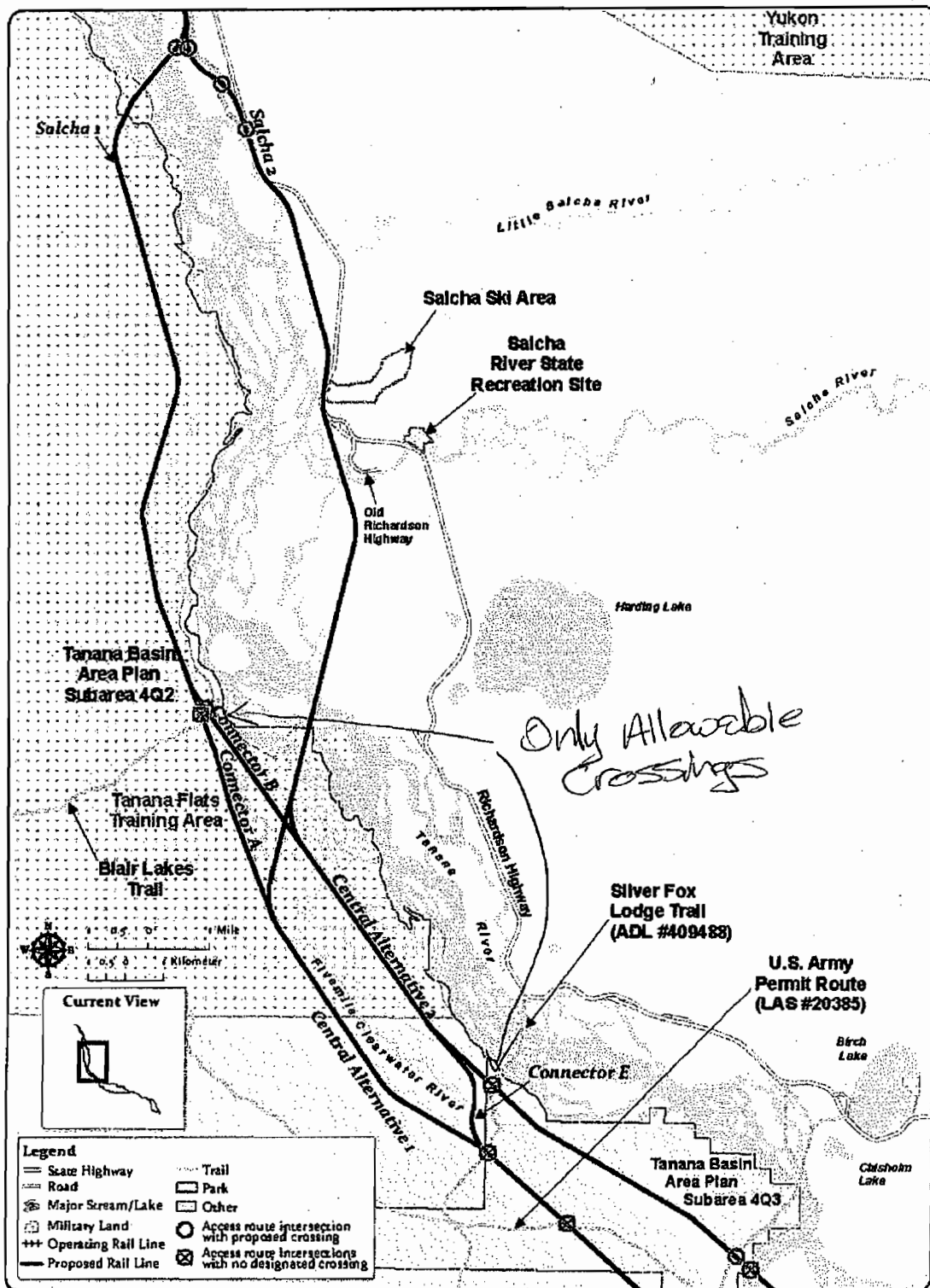


Figure 13-4 – Map of Recreational Facilities along the Salcha, Connector, and Central Alternative Segments

ADNR regulations allow for the construction of trails up to 5 feet wide (unserialized trails) on state land. Individuals are not required to report the use or location of these trails to the ADNR. Trails of this type are quite common on state lands along many of the proposed alternative segments. The Alaska Division of Mining, Land & Water, has indicated that it would consider closure of these generally allowed trails to be an impact, would require further investigation to determine their location and use, and would require accommodation of these legal features (Proulx, 2008).

Access to areas west and south of the Tanana River (the majority of the proposed project route) is generally available via tributary river systems in both summer and winter. These river systems provide access for boats, and winter access for snowmachiners, dog-sledders, skiers, and snowshoers. Access up these river systems depends on clear passage, and the numerous bridges and culverts that would be required for the proposed rail line could result in an obstruction, depending on the amount of clearance available for passing under a bridge or through a culvert. Use of culverts on smaller waterways would likely block all access; however, it is generally assumed that most main river access routes to areas west of the Tanana River would be via larger rivers and streams (Fivemile Clearwater Creek, Little Delta River, Delta Creek), where bridges with ample clearance would be used. Major bridges at the Salcha River, Tanana River, and Delta River would also have adequate clearance for boats and other vehicles. In addition, ARRC has supplied conceptual design information pertaining to bridges on smaller streams (see impact analysis for individual segment alternatives), and not all small bridges would be passable by boats or other vehicles. ADNR's Tanana Basin Area Plan includes a management guideline to provide adequate clearance for passage of boats, pedestrians, horses, and large game whenever these uses occur or are anticipated to occur at significant levels. Water Quality Management Guideline E states that alternative public access must be provided if a structure would block access (ADNR, 1985, updated 1991).

Off-road vehicles provide an important mode of accessing areas west of the Tanana River. Routes for these vehicles may follow established trails and roadways. Riding snowmachines, jeeps, and small off-road vehicles on ADNR land is a generally allowed activity, though permits can be required in areas with special designations. ADNR and ARRC are encouraged to develop a negotiated agreement that would define rail line crossings for off-road vehicle access on existing roads and trails.

ARRC to provide for a systematic mitigation approach for existing public roads and trails. In roadless areas, off-road vehicles would be prohibited from crossing the rail line at non-designated points. Several stretches of alternative segments have long distances between crossable locations (at roads/trails or along waterways with adequate bridge clearance to allow an off-road vehicle to pass underneath). This would likely result in decreased off-road vehicle access to public lands west of the rail line.

ARRC has not designated vehicular or non-vehicular crossing points for most established trails and roadways known to ADNR, nor has a method been developed to date for identifying and mitigating the numerous unserialized trails developed by members of the public and allowed under Alaska state law. All trails and roads that have no existing mitigation proposed by ARRC could result in closure of the resource and commensurate decrease in public access. This would contradict the public access management guidelines as outlined in the Tanana Basin Area Plan, in which retention of existing public access constitutes the first goal (ADNR, 1985, updated 1991).