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743 Chena Hot Springs Rd.
Fairbanks AK 99712
January 14, 2009

David Navecky
STB Finance Docket No. 34658
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Dear Mr. Navecky:

I recently attended a public meeting to discuss the draft EIS in North Pole, Alaska. I offer the following comments:

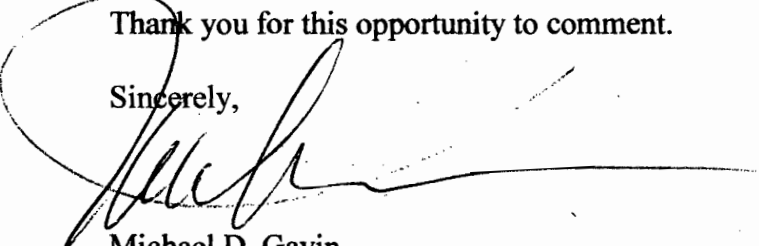
- 1) The document should look at other alternative routes which would have less impact on the residents. For example, on the Fairbanks end place the line in the existing transportation corridor and move the line south of the river just after leaving Eielson. Or better yet, move the line to the south of the Tanana River immediately before the Chena River Overflow. This would provide for far fewer impacts on the public and "human" environment. The government ground on the north and south side of the river is a perfect place for a government railroad as it would require no private land "taking".
- 2) The Flats are highly used by Alaskans including recreationalists, hunters, trappers and snowmobile operators. The document doesn't show adequately the existing game trails, foot trails, RS2477 trails or vehicle trails including ATV trails, swamp buggy trails, snowmachine trails and airboat trails that will be negatively impacted by the construction and operation of a railroad. There are so many trails accessing the Flats for ice fishing, accessing cabins, accessing private property, hunting and trapping. I am concerned that so few trails are shown in the document, even some major ones have been left out. Mitigation could be through the use of undercrossing "tubes" and guidance fencing every couple of miles or overcrossings. These crossing should be large enough to accommodate "weasel" type tracked vehicles, airboats, four- six- and eight-wheel ATV's and snowmachines that commonly access the flats across the proposed rail lines. These protected crossings would also help reduce the number of moose killed by the trains.
- 3) The clear creek just upstream from Flag Hill on the south of the Tanana River is not appropriately depicted. I feel that this stream flows as much water as the Little Salcha, yet it doesn't even show up on the plates in the summary, see page Summary page S-7 figure S-4. This stream is ground water fed. It runs year round, builds shelf ice but doesn't freeze up. I am concerned that the connections shown, namely "Connector E" or "Donnelly 2" will cause irreparable, immitigable damage to this water body. The lines go directly through the area responsible for the flow of this stream. This stream supports silver salmon,

grayling and white fish, many fowl and terrestrial creatures. If the rail bed disrupts the flow of ground water to the stream, the impacts will be dramatic: it could dry up this stream. The rail bed could create a freeze bulb which could act as a subterranean dam cutting off the flow to the stream. This resource needs to be protected. There are so few accessible clear water streams south of the Tanana to adversely impact one should be avoided. A more southern route could eliminate this impact. A bridge constructed over the head waters should minimize the flow impacts.

- 4) The proposed lines on the south side of the river need to accommodate the migration of moose. The Tanana Flats contains the highest density of moose in Alaska. Many people subsist thus depend on the protein provided by the Flats. Moose crossing areas need to be identified, much like the signed moose crossing areas along our highways. Crossing "tubes" or "overcrossings" should be provided to reduce the number of moose kills along the corridor.
- 5) I'm concerned that access to what I call Clear Creek (5 mile Clear Creek?) will be negatively impacted by Central Alternative 2/Donnelly2. If the preferred alternative is a rail line that runs parallel to and between the Tanana River and Clear Creek the access waterway, which is a side slough of the Tanana River (southern edge) abeam Flag Hill that is used to access Clear Creek, may be eliminated with dikes or other river training structures or possibly by the rail bed itself. If the Central2/Donnelly2 is chosen as the preferred alternative, some construction ditching to create an adequate navigable channel and along with a requirement for the railroad to maintain the channel should be required. The Salcha crossing and the most southern rail route would eliminate these conflicts.
- 6) I understand on page S-1 in the Summary the purpose of the project but the need is not well enough defined. The Richardson Highway is a 24/7 facility, I think classified as "Interstate". I also believe the traffic volumes are low with no congestion within the rail project boundaries. To imply that the highway is not a dependable year-around facility and is affected by inclement weather is not correct. I'm not aware of it being closed by weather in the last 25 years. The primary commercial freight generators at present are "south" of this project, like the coal fields and oil refinery and the primary users, like Eielson, Wainwright, Anchorage and Fairbanks already have an adequate rail connection. To promote most likely a billion dollar project to provide public transit where the demand is essentially non-existent or increase tourism where there is really no attraction seems a bit thin. I suggest you re-evaluate the need for this project or at least restate it in the final EIS. Perhaps all that is really required at this time is a bridge across the Tanana for military access to their training grounds; in fact that is the real "Need".

Thank you for this opportunity to comment.

Sincerely,



Michael D. Gavin