



Fairbanks North Star Borough

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February 2, 2009

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

RE: Northern Rail Extension Draft EIS

Dear Mr. Navecky:

Fairbanks North Star Borough appreciates the opportunity to comment on the Northern Rail Extension Draft EIS. FNSB supports the development of the Northern Rail Extension and views it as a critical economic development project for the Borough and the State of Alaska. It is also a nationally significant transportation project, which will support military training and ongoing development at Ft. Greely.

Based on our review of the draft EIS, we would like to forward the following comments:

2-12 (Figure) Richardson Highway and Salcha School Relocation

FNSB opposes the Salcha 2 Alignment, which would require the relocation of Salcha Elementary School. This would be a severe hardship for the Salcha Community, as this is the only elementary school in the area.

In addition, a native cemetery for the Salchaket Band of Athabascan Indians is located on the south end of the ridge as well as an archeological site. Both have significant importance to the history and culture of the State of Alaska and should be avoided.

4.2 Surface Water

The subsection on Excavation of Gravel Pits discusses material sources for this project. Later in Section 4.5 the draft EIS elaborates on what is proposed. It discusses 560 acres of borrow pits, one 17 acre pit every 2.5 miles, for a total of 33 borrow pits. There is no discussion on any reclamation of the pits. Certainly a number of these pits could be in locations where they could be reclaimed for recreational uses. Many pits originally dug for road projects are now very popular roadside fishing ponds, this project seems to offer similar potential. Perhaps a centralized larger pit could be provided to ultimately

be developed into a Chena Lakes type facility for Delta Junction. Reuse of these material sites should be addressed by the plan and included in the mitigation measures.

4.5.2 Environmental Consequences

On page 4-55 of the EIS states "Construction of the rail line would require that the 200 foot ROW be cleared of surface vegetation." While it is understandable that much of the corridor would be cleared to provide visibility to avoid moose strikes etc., there should be some sensitivity to adjacent land uses. One area of particular concern is the proposed alignment adjacent to Piledriver Slough. Hopefully some buffers will be mandated for well used recreational sites like this, that would supersede a blanket 200 foot clear-cut. This should be addressed by a mitigation measure.

4.6 Floodplain Resources

Is it anticipated the construction of the new rail corridor will either positively or negatively impact flooding in the Salcha area?

11. Transportation Safety and Delay

The existing crossing of the Richardson Highway to serve Eielson AFB does not seem to be addressed. Would this project modify the existing crossing? Is a grade separation proposed as part of this project?

20.2.10 Land Use

While there is discussion on access to trails, the Draft does not really deal with preserving existing legal access for local roads. There are no diagrams depicting land ownership and local dedicated roads. It is our understanding that crossings will be limited by the anticipated speed of the trains, thus presenting a significant impact to the people who will either be separated from their property by the right of way acquisitions or forced to travel great distances to get to their farms or homes, depending upon the circumstances. The railroad has a number of crossing tools to allow and control access, from elevated crossings to gates and lights, and culverts. The assessment needs to more specifically identify how they can deal with existing crossings and allow for future access where none presently exists. Public road rights-of-way need to be protected by the process.

Adequate crossing locations need to be provided to ensure that the proposed rail corridor will not eliminate existing recreational opportunities on the other side of the corridor. The EIS states: "Many of the alternate segments west and south of the

Tanana River would include long stretches with no designated public crossing points. Without creation of trail crossings along these long stretches, public access across the rail ROW would be significantly restricted or prohibited." We are in agreement with this statement and support the concepts regarding crossings that were recommended in SEA's Preliminary Mitigation Measures for 20.2.10 Land Use. We would, however, like to see some of the required mitigation measures strengthened.

Here are comments on particular SEA recommendations:

56) Recommends the applicant "consult" with U.S. Army Corps of Engineers and other agencies regarding impacts and mitigation regarding a planned project associated with the Moose Creek grade separation. We would like to see stronger wording requiring incorporation of the project into Northern Rail Extension project.

60) Requires the applicant "consult" with agencies to provide enough bridge clearance for passage of recreation watercraft. This should include the provision that any crossings of waterways will be constructed with at least the minimum clearances recommended by the agencies.

61) Good start, but this recommendation needs to be strengthened and expanded. It again requires the applicant "consult" with agencies, but it should also require construction of crossings for legal trail easements. It goes on to "include discussion of general dispersed-use access, informal trails on state land, blazed section lines, and long stretches of rail line without designated public crossings." This needs to go beyond "discussion". There needs to be a requirement for legal crossings at some minimum interval to provide for general access across the corridor.

62) This covers the main trails that the proposed corridors would cross that we are aware of within the Borough.

63) The "shall consider" wording does not provide much assurance. They should have to provide crossings to accommodate the named trail facilities. In some cases, the aforementioned crossings at minimum distance spacing may be adequate.

Overall

The draft EIS does a comprehensive job of analyzing many of the potential impacts of the rail extension corridor. The mitigation measures proposed by the applicant and SEA in Section 20.2 address the majority of the impacts of the project. Additional work needs to be done to explain where crossings of the corridor will be provided to accommodate existing and future roads and trails and crossings in general. This should

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include the type and design of crossings proposed and the time frame for construction. The Fairbanks North Star Borough supports the Alaska Railroad's preferred Eielson 3 option, the Alaska Railroad's preferred Salcha 1 option, and does not express an opinion on the Connector and Donnelly options.

Fairbanks North Star Borough fully supports the project to extend the Alaska Railroad to Delta Junction. We thank you again for the opportunity to provide comments and anticipate that our comments will be addressed in the final EIS for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Whitaker", with a stylized flourish at the end.

Jim Whitaker, Mayor

JW:tb-csm