

Draft Environmental Impact Statement

STB Finance Docket No. 34658

Alaska Railroad Corporation Construction and Operation of
a Rail Line between North Pole and Delta Junction, Alaska

Volume II



Lead Agency:

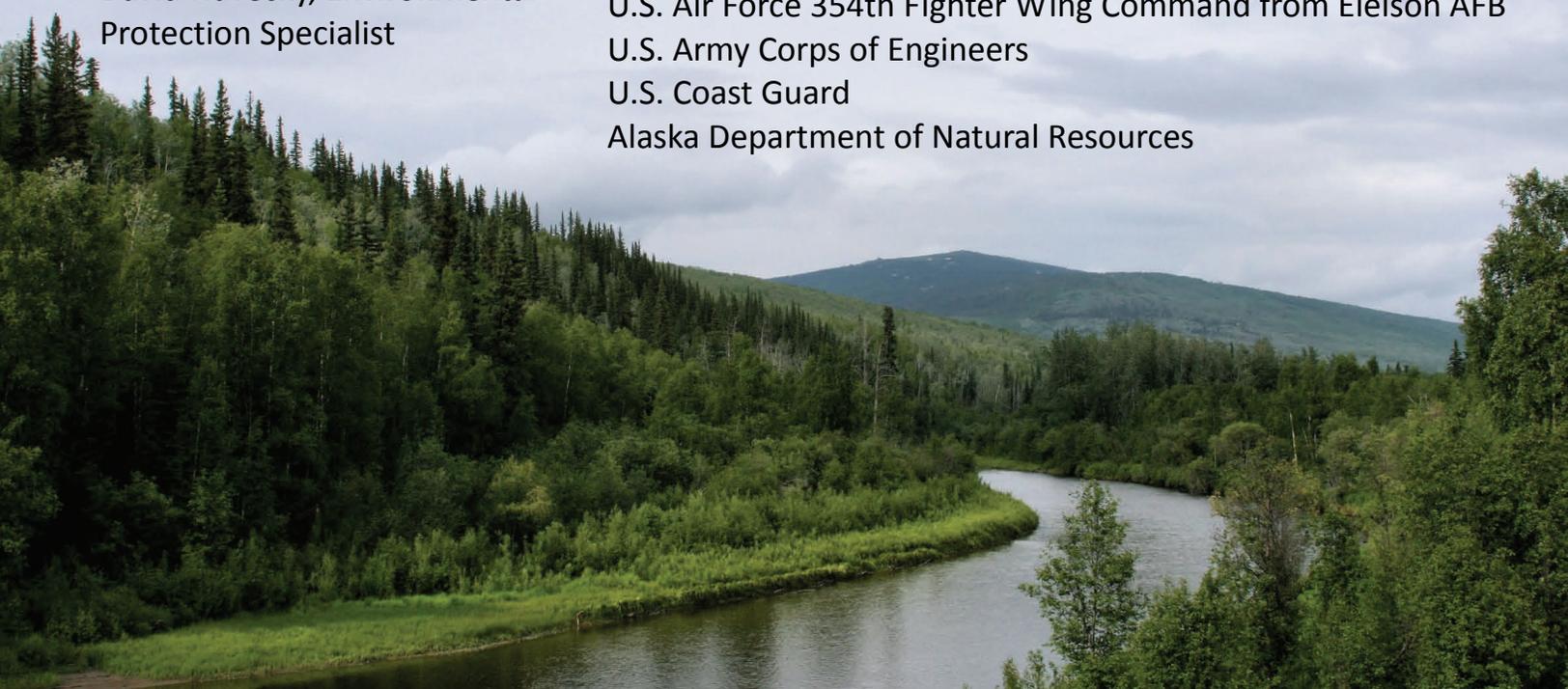
Surface Transportation Board

Information Contacts:

Victoria J. Rutson, Chief
David Navecky, Environmental
Protection Specialist

Cooperating Agencies:

U.S. Department of Defense Alaskan Command
Bureau of Land Management
Federal Transit Administration
Federal Railroad Administration
U.S. Air Force 354th Fighter Wing Command from Eielson AFB
U.S. Army Corps of Engineers
U.S. Coast Guard
Alaska Department of Natural Resources



List of Appendices

- Appendix A Acronyms and Abbreviations**
- Appendix B Correspondence with Agencies**
- Appendix C Tribal and Government-to-Government Consultation**
- Appendix D Alternatives Development and Elimination**
- Appendix E Water Resources**
- Appendix F Biological Resources**
- Appendix G Essential Fish Habitat**
- Appendix H Draft Programmatic Agreement**
- Appendix I Subsistence Methodology and Communities**
- Appendix J Noise and Vibration**
- Appendix K Transportation Safety and Delay**
- Appendix L Identified Hazardous Material Sites and Regulated Facilities, and Database Records**
- Appendix M Section 4(f) Evaluation**
- Appendix N Visual Inventory and Visual Contrast Analyses**

Appendix A – Acronyms and Abbreviations

A. ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
AADT	Annual Average Daily Traffic
AAR	Association of American Railroads
ACHP	Advisory Council on Historic Preservation
ADCED	Alaska Department of Community & Economic Development
ADEC	Alaska Department of Environmental Conservation
ADEC/EH	Alaska Department of Environmental Conservation, Division of Environmental Health
ADEC/SPAR	Alaska Department of Environmental Conservation, Division of Spill Prevention and Response
ADEC/WQ	Alaska Department of Environmental Conservation, Division of Water Quality
ADF&G	Alaska Department of Fish and Game
ADL	Alaska Division of Lands
ADNR	Alaska Department of Natural Resources
ADOT&PF	Alaska Department of Transportation and Public Facilities
AFB	Air Force Base
AFN	Alaska Federation of Natives
AGIA	Alaska Gasline Inducement Act
AGPPT	Alaska Gas Producers Pipeline Team
AIRFA	American Indian Religious Freedom Act of 1978
ALCAN	Alaskan-Canadian
ALCOM	U.S. Department of Defense Alaska Command
ANCSA	Alaska Native Claims Settlement Act
ANGTS	Alaska Natural Gas Transportation System
ANHP	Alaska Natural Heritage Program
ANILCA	Alaska National Interest Lands Conservation Act
APE	Area of Potential Effect
APSC	Alyeska Pipeline Service Company
AR	Army Regulation
ArcGIS	Arc Geographic Information System
AREMA	American Railway Engineering Maintenance-of-Way Association
ARPA	Archaeological Resource Protection Act of 1979
ARRC	Alaska Railroad Corporation
AS	Alaska Statute
ASLRRRA	American Short Line and Regional Railroad Association
BAX	Battle Area Complex at Donnelly Training Area
BCR4	Alaska's Bird Conservation Region 4
BLM	Bureau of Land Management
BMEWS	Ballistic Missile Early Warning System

BMLW	Bureau of Mining, Land, and Water
BMP	Best Management Practice
BNSF	Burlington Northern Santa Fe
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CAA	Clean Air Act of 1970
CAAA	Clean Air Act Amendments of 1990
CACTF	Combined Arms Collective Training Facility
CADNA	Computer Aided Noise Abatement program
CEMML	Center for Environmental Management of Military Lands
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
CHPP	Central Heat and Power Plant
CO	Carbon Monoxide
CO₂	Carbon Dioxide
COMDTINST	U.S. Coast Guard Commandant Instruction
CONUS	Continental United States
CORRACTS	Corrective Action Report
CRLFCP	Chena River Lakes Flood Control Project
CSP	Contaminated Sites Program
CSU	Colorado State University
CWA	Clean Water Act of 1977
CXST	CXS Transportation
dBA	A-weighted Decibels
DCED	Department of Commerce, Community and Economic Development
DCMPS	Delta Creek Material Processing Site Location
DM	Department Manual
DMA	Duane Miller Associates
DMU	Diesel Motorized Unit
DNL	Day-Night Average Noise Level
DoD	Department of Defense
DOLWD	Alaska Department of Labor and Workforce Development
DRO	Diesel Range Organics
DSMOA	Defense State Memorandum of Agreement in 1991
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EEZ	Exclusive Economic Zone
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement

EO	Executive Order
EPA	Environmental Protection Agency
EPRCA	Summary of the Emergency Planning & Community Right-to-Know Act of 1986
ESA	Endangered Species Act of 1973
FARLR	Fairbanks Area Rail Line Relocation
FBX	Fairbanks Intermodal Facility and Depot
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FFA	Eielson Air Force Base Federal Facilities Agreement of 1990
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act of 1996
FLPMA	Federal Land Policy and Management Act of 1976
FMATS	Fairbanks Metropolitan Area Transportation System Plan
FNSB	Fairbanks North Star Borough
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FR	Federal Register
FRA	Federal Railroad Administration
FRPA	Alaska Forest Resources Practice Act, Alaska Statute 41.17
FRSA	Federal Railroad Safety Act of 1970
FTA	Federal Transit Administration
FUDS	Formerly Used Defense Sites
FWCA	Fish and Wildlife Coordination Act
GIS	Geographic Information System
GMU	Game Management Unit
GPS	Global Positioning System
GRO	Gasoline Range Organics
HABS/HAER	Historic American Buildings Survey/ Historic American Engineering Record
HFP	U.S. Army Haines-Fairbanks Pipeline
HSA	Highway Safety Act
HW	Hazardous Waste
I/M	Inspection & Maintenance
IC	Institutional Control
IPCC	Intergovernmental Panel on Climate Change
IPP	Industry Preparedness Program
KOP	Key Observation Point
LOS	Level of Service
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
mg/L	Milligrams per Liter
mg/m³	Micrograms per Cubic Meter

MSFCMA	Magnuson-Stevens Fishery Conservation and Management Act
MT	Microwave Tower
mton/yr	Metric Tons per Year
N/A	Not Available
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act of 1990
NEPA	National Environmental Policy Act of 1969
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act of 1966
NIP	Nonnative Invasive Plant
NLUR	Northern Land Use Research, Inc.
NMFS	National Marine Fisheries Service
NO₂	Nitrogen Dioxide
NOAA	National Oceanic & Atmospheric Administration
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRE	Northern Rail Extension
NRHP	National Register of Historic Places
O₃	Ozone
°F	Degrees Fahrenheit
ORV	Off-Road Vehicles
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PADS	Polychlorinated Biphenyls Activity Database System
Pb	Lead
PCAPS	Personal Computer Accident Prediction System
pH	Potential of Hydrogen
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	Particulate Matter
PM₁₀	Particulate Matter less than 10 microns
PM_{2.5}	Particulate Matter less than 2.5 microns
POL	Petroleum, Oils, Lubricants
ppb	Parts per Billion
ppm	Parts per Million
PPV	Peak Particle Velocity
PSD	Prevention of Significant Deterioration Program
RAATS	RCRA Administrative Action Tracking System
RAP	Recreation Access Permit
RCRA	Resource Conservation and Recovery Act of 1976
ROD	Record of Decision
ROW	Right-of-Way

RSPA	Research and Special Programs Administration
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SARA	Superfund Amendments and Reauthorization Act of 1986
SDWA	Safe Drinking Water Act
SEA	Section of Environmental Analysis
SERC	Alaska State Emergency Response Commission
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
SPCC	Spill Prevention, Control, and Countermeasure Plan
SRB&A	Stephen R. Braund and Associates
STB	Surface Transportation Board
SWPPP	Stormwater Pollution Prevention Plan
TA	Training Area
TAPS	Trans Alaska Pipeline System
TCC	Tanana Chiefs Conference
TD-2	Type Designation-2
TDD	Telecommunications Device for the Deaf
TRB	Transportation Research Board
TSCA	Toxic Substances Control Act of 1976
USACE	U.S. Army Corps of Engineers
USAG-AK	U.S. Army Garrison Alaska
USARAK	U.S. Army Alaska
U.S.C.	United States Code
USCG	U.S. Coast Guard
USDA	U.S. Department of Agriculture
USDOJ	United States Department of the Interior
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
USTs	Underground Storage Tanks
VdB	Root-Mean-Square Velocity
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRM	Visual Resource Management
WAMCATS	Washington-Alaska Military Cable and Telegraph System
WRCC	Western Regional Climate Center

Appendix B – Correspondence with Agencies

B. CORRESPONDENCE WITH AGENCIES

This appendix contains a selection of the Section of Environmental Analysis's (SEA's) written correspondence with Federal, state, and local agencies. The first letter, sent to the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries Service) on June 6, 2005, is representative of 18 others sent to agencies requesting comments and assistance during the scoping period. The sixth letter, sent to the U.S. Coast Guard (USCG) on October 12, 2005, is representative of seven others sent to a smaller set of agencies inviting them to participate in the EIS (Environmental Impact Statement) process as cooperating agencies. The Alaska Department of Natural Resources (ADNR) was invited to participate in the EIS process as a cooperating agency at a later date, and its invitation letter is included separately.

Table B-1 lists all of the agencies with which SEA has corresponded. Copies of correspondence between SEA and the agencies on the dates listed in Table B-1 are included.

Agency	Dates of Correspondence
Federal Agencies	
National Oceanic and Atmospheric Administration, National Marine Fisheries Service	6/6/2005; 1/12/2006
U.S. Coast Guard	6/6/2005; 10/12/2005
U.S. Department of Defense, Air Force- 354 th Fighter Wing	10/12/2005
U.S. Department of Defense, Army Corps of Engineers	6/6/2005; 10/12/2005; 12/6/2005; 9/27/2007
U.S. Department of Defense, U.S. Army Garrison – Alaska Command	10/12/2005
U.S. Department of Defense, Alaska Command	10/12/2005; 4/17/2006
U.S. Department of the Interior, Bureau of Land Management	6/6/2005; 10/12/2005; 9/27/2007
U.S. Department of Transportation, Federal Railroad Administration	10/12/2005; 10/9/2007
U.S. Department of the Interior, U.S. Fish and Wildlife Service	6/6/2005; 1/13/2006
U.S. Environmental Protection Agency	6/6/2005; 1/13/2006
State Agencies	
Alaska Department of Commerce, Division of Community Advocacy	6/9/2005
Alaska Department of Environmental Conservation	6/6/2005
Alaska Department of Fish & Game, Division of Subsistence	6/6/2005
Alaska Department of Fish & Game, Sport Fish Division	6/6/2005
Alaska Department of Fish & Game, Wildlife Conservation	6/6/2005
Alaska Department of Natural Resources, Office of Habitat Management and Permitting	6/6/2005
Alaska Department of Natural Resources, Office of History and Archaeology, State Historic Preservation Officer	6/6/2005; 4/5/2006; 5/9/2006; 8/18/2006; 9/5/2006; 9/24/2007
Alaska Department of Natural Resources, Office of Mining, Land and Water	6/6/2005
Alaska Department of Natural Resources, Office of Project Management/Permitting	1/13/2006; 9/17/2007

Table B-1
Agencies Consulted and Dates of Correspondence (continued)

Agency	Dates of Correspondence
Alaska Department of Transportation & Public Facilities, Right-of-Way Office	6/6/2005
Local Agencies	
City of Fairbanks	6/6/2005
City of Delta Junction	6/6/2005
City of North Pole	6/6/2005
Fairbanks North Star Borough	6/6/2005



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

June 6, 2005

Larry Peltz
National Marine Fisheries Service
Protected Resources Division
and Habitat Conservation Division
222 West 7th Ave, Box 43
Anchorage, AK 99513

Re: STB Finance Docket No. 34658, The Alaska Railroad Corporation – Petition for Exemption to Construct and Operate a Rail Line Between Eielson Air Force Base (North Pole) and Fort Greely (Delta Junction), Alaska

Dear Mr. Peltz:

The Alaska Railroad Corporation intends to file a petition with the Surface Transportation Board (Board), pursuant to 49 U.S.C. 10502, requesting authority to construct and operate a new rail line from Eielson Air Force Base to Fort Greely, Alaska. The Board would be the Federal agency responsible for granting authority for the construction and operation of the proposed new rail line. The Section of Environmental Analysis (SEA) is the office within the Board responsible for preparing the appropriate National Environmental Policy Act (NEPA) documentation for railroad construction and operation cases that come before the Board.

While SEA plans to initiate the scoping process for the preparation of an Environmental Impact Statement later this summer or fall, we would like to meet with representatives of interested Federal, state and local agencies as early as possible. At these meetings, Mr. David Navecky, the Project Manager for SEA for this environmental review, would like to discuss the project in general terms and provide an overview of SEA's forthcoming environmental review process. We are hoping that you are available sometime during mid June to meet with Mr. Navecky and his team. The team includes ICF Consulting, which is serving as the independent third-party consultant to assist SEA with the NEPA review process. A member of ICF's team will contact you to determine whether your agency has an interest in meeting during that time. I have provided some information about the project below.

Project Description

The proposed Northern Rail Extension Project would involve the construction of approximately 80 miles of new rail line connecting the existing rail line near Eielson Air Force Base near North Pole, Alaska to Fort Greely and the Donnelly Training Area near Delta Junction, Alaska (see attached map). The proposed rail line would cross the Tanana River, possibly near Flag Hill, allowing the U.S. Army year-round access to the Tanana Flats and Donnelly training areas. The proposed project would include the construction of a 1.5-mile spur line from the vicinity of Flag Hill to the Blair Lakes Military Training Area. Construction of the proposed rail line would also provide all the major military installations in Alaska with rail access to the Port of Anchorage.

If you have any questions please do not hesitate to contact Alan Sumnerville, ICF Consulting Project Manager, at (703) 934-3616 or Dave Navecky, SEA Project Manager, at (202) 565-1593.

Sincerely,

Victoria Rutson
Chief
Section of Environmental Analysis

Attachment



United States Department of the Interior
 FISH AND WILDLIFE SERVICE
 Fairbanks Fish and Wildlife Field Office
 101 12th Avenue, Room 110
 Fairbanks, Alaska 99701
 January 13, 2006



Surface Transportation Board
 Case Control Unit
 Attn: David Navecky
 Environmental Filing
 1925 K Street, NW
 Washington, D.C. 20423-0001

Re: STB Finance Docket No. 34658
 Draft Scope of Study for FIS

Dear Mr. Navecky:

The U.S. Fish and Wildlife Service has reviewed the referenced draft Scope of Study for the Alaska Railroad Corporation's (ARRC) Northern Rail Extension Project. ARRC proposes to construct and operate a new rail line between Eielson Air Force Base and the Delta Junction/Fort Greely area. The project would include about 80 miles of new mainline track, and could include a rail spur (about 15 miles) to the U.S. Air Force's Blair Lakes training area. The Service has provided verbal comments concerning this project at previous meetings. We appreciate this opportunity to summarize our comments as they relate to the draft Scope of Study and the potential environmental effects of the project.

Reasonable and Feasible Alternatives – Proposed Alignments: The Service encourages the development and selection of an alternative that both meets the objectives of the project and minimizes impacts to fish and wildlife resources, particularly the loss of wetlands and other important habitats. Currently, the Service has been working with landowners along Pledriver and Twentythree-Mile Sloughs west of Eielson Air Force Base to improve fish habitat. All three of the proposed alignments pass through at least a portion of this area. Since alignment N3 crosses the Richardson Highway between Miles 10-11 and then back between Miles 22-23, the Service would like to have considered an additional alignment (say N3a) that crosses the highway near Mile 0 instead of between Miles 10-11. This additional alignment could then either pass through Eielson Air Force Base using the existing alignment, or pass immediately west of the airfield between the airfield and the highway before reconnecting to the N3 alignment between Miles 10-11. This alignment would bypass Pledriver and Twentythree-Mile Sloughs altogether.

Land Use: The aerial photos provided in the *Preliminary Alignments Map Set (Rev. 2)* are very helpful for project planning. The Service recommends that aerial photos also be included for the Blair Lakes Spur (Maps 6-7).

Biological Resources: The Service has little biological information upon which to base a rational evaluation for much of the proposed alignments. We therefore recommend that:

UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 National Marine Fisheries Service
 P.O. Box 21668
 Juneau, Alaska 99802-1668
 January 12, 2006



David Navecky
 Surface Transportation Board
 Case Control Unit
 1925 K Street, NW
 Washington, D.C. 20423-0001

Subject: STB Finance Docket No. 34658

Dear Mr. Navecky:

The National Marine Fisheries Service (NMFS) has reviewed the proposed Northern Rail Extension Environmental Impact Statement (EIS) Process. Your agency has requested NMFS comments on potential environmental impacts. The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires Federal agencies to consult with NMFS on all actions, or proposed action, authorized, funded, or undertaken by the agency, that may adversely affect essential fish habitat (EFH). EFH for this project is all streams where salmon are present.

The Northern Railroad Extension corridor contains numerous streams that serve as EFH for Chinook, chum and coho salmon. The stream crossings and wetland fills associated with this project have the potential to cause negative impacts to salmon EFH. Thorough planning as well as project design and implementation can help to avoid and minimize negative impacts.

The EIS should contain a detailed EFH Assessment. Examples of EFH Assessments and other guidance for EFH consultations can be found on the NMFS web site: <http://www.nmfs.noaa.gov/habitat/habitatprotection/efh/consultation6.htm>. The EFH Assessment can be an appendix to the EIS, and can contain references to the main body of the EIS to avoid repeating project details and other information. NMFS is available to assist with development of the EFH Assessment. Please contact Larry Peltz in our Anchorage office (907-271-1332) or lawrence.peltz@noaa.gov with any questions.

Sincerely,

Robert D. Mécum
 Acting Administrator, Alaska Region



- Raptor nests be surveyed within a quarter-mile of the proposed alignments for at least two nesting seasons.
- Plant communities be delineated and classified within a quarter-mile of each proposed alignment. The Service recognizes that certain plant communities have higher habitat value than others, so the classification should include at least the following higher-value habitats: freshwater fens, riparian corridors, tall (≥ 5 ft) shrub habitats, open-water wetlands with emergent/submergent vegetation, Interior Alaska mixed forested wetlands, non-riparian low to medium (< 5 ft) shrub, open-water oxbows and sloughs, and wet meadows.
- Wetlands be delineated and classified within a quarter-mile of each proposed alignment. Portions of the alignments have previously been mapped by the National Wetlands Inventory (<http://wetlands.fws.gov/>). We recommend that the unmapped areas be delineated and classified using NWI standards.
- The biological impacts from other project-related activities in addition to the rail line alignments are considered, such as material and disposal sites, and work camps.

The Service also recommends a timing window for land-clearing, excavation and fill to prevent the destruction of migratory bird nests, eggs or nestlings during the spring and summer breeding season. The Migratory Bird Treaty Act prohibits the willful killing or harassment of migratory birds, so we recommend that clearing, excavation and fill activities be completed prior to May 1 or after July 15 in Interior Alaska to avoid impacts to breeding migratory birds. If this is not possible, then other measures to avoid impacts to breeding migratory birds should be initiated.

Water Resources: Construction through wetlands, streams, and rivers should be designed to minimize the short-term (e.g., temporary construction activities) and the long-term (e.g., railbed) footprint. Alignments through high-value wetlands should be minimized. Bridges should be used where practicable across the full width of the floodplain, rather than restricting the floodplain with culverts and embankments, which tend to promote channel incision from increased flow velocity and channel narrowing by accretion. Small drainage patterns should be maintained and their flow allowed to pass freely without impounding water or directing the flow through a few, larger culverts. Both impounding water behind structures and diverting the natural flow can adversely impact wetland and riparian plant communities.

Cumulative Impacts: The cumulative impacts should evaluate the potential impacts of other projects that may become feasible with the completion of the rail extension, such as increased development of the Tanana Flats resulting from improved access provided by the new rail line.

We look forward to working with the ARRC and the Surface Transportation Board on the Draft Environmental Impact Statement (EIS) for this project, and we appreciate this opportunity for early comment. Please contact Bob Henszey at 907-456-0323 should you have any questions concerning these comments.

Sincerely,



Larry K. Bright
Branch Chief, Project Planning

tlb/jjt

cc: Christy Everett, USACE, Fairbanks
Bernardo Hernandez, Director of Community Planning, Fairbanks NSB
Robert McLean, ADNRC-OIIMP, Fairbanks
Mark Jen, EPA, Anchorage

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JAN-13-2006 FRI 01:39 PM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

January 13, 2006

EI-1854

Reply To: EITPA-088
Attn of:

Ref: 05-053-STB

Mr. David Navecky
Surface Transportation Board
Case Control Unit
1925 K Street, NW
Washington, DC 20423-0001

Dear Mr. Navecky:

The U.S. Environmental Protection Agency (EPA) Region 10, has reviewed the October 26, 2005, Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) and Notice of Availability (NOA) of the Draft Scope of Study for the proposed Northern Rail Extension Project between Eielson Air Force Base (North Pole, Alaska) and Fort Greely (Delta Junction, Alaska). Our review of the NOI and NOA was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Clean Air Act §309, and the Clean Water Act.

EPA appreciates the opportunity for early involvement in the planning process by providing scoping comments on the proposed Northern Rail Extension Project. The enclosed comments are provided to inform the Surface Transportation Board (STB) of issues that warrant consideration during the planning process for the EIS.

Although EPA is not a formal cooperating agency, we would appreciate the continued early coordination and involvement with your office throughout the development of this EIS. We would be available to work with your agency to review and comment on preliminary sections of the document. If you have any questions regarding our comments, please do not hesitate to contact Mark Jen of my staff in the Alaska Operations Office in Anchorage by phone at (907) 271-3411 or by email at jen.mark@epa.gov. We look forward to continued involvement in this important project.

Sincerely,

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure

cc: Brett Flint, Alaska Railroad Corporation

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PAGE 02

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PAGE 03

EPA REGION 10
SCOPING COMMENTS
ON THE NORTHERN RAIL EXTENSION PROJECT

SCOPING SUMMARY REPORT

As indicated in the NOI, at the conclusion of the scoping and comment period, a Final Scope of Study for the EIS will be issued. We support the development of such a document and recommend that it include a summary that identifies the types of comments raised during scoping, and demonstrates how these comments will be addressed in the EIS.

DEFINING THE PROJECT AREA

The EIS should clearly identify and delineate the project area to be analyzed for the Northern Rail Extension Project. The project area should be broad in scope to allow full consideration of the direct, indirect, and cumulative impacts resulting from this proposed project. The project area should not be restricted to a narrow corridor of the proposed rail line Right-of-Way (ROW). The project area for EIS analysis should include the proposed military training sites, such as the Tanana Flats/Blair Lakes and Donnelly training areas. The project area should encompass the communities within the rail corridor (e.g. North Pole, Saicha, Big Delta, Delta Junction) and potentially affected communities outside the rail corridor (e.g. Fairbanks, Anchorage, Seward, and Whittier). Furthermore, we recommend that the EIS include a discussion of how the project area was identified for the analysis in the EIS.

PURPOSE AND NEED

The EIS should include a clear and concise statement of the underlying purpose and need for the proposed action; consistent with the NEPA implementing regulations (see 40 CFR 1502.13). In presenting the purpose and need for this project, the EIS should reflect not only that of the Surface Transportation Board and the project proponent, but also that of the broader public interest and need. The purpose and need statement should be broad enough so that it would not preclude consideration and evaluation of the full range of reasonable and feasible alternatives and not unduly constrain the range of reasonable alternatives. The purpose and need statement should clearly reflect the construction and operation of the northern rail line extension to support all known public, private, and government interests. In particular, a rail line extension would provide for military training and access to military training areas, as well as enhance other military actions.

ALTERNATIVES ANALYSIS

Alternatives Criteria Development. The EIS should identify specific criteria that would be used to (1) develop a range of reasonable alternatives, (2) eliminate alternatives considered, and (3) select the agency preferred alternative. These criteria should be based on factors such as conservation of important aquatic and terrestrial habitats, maintaining wildlife and fish passage, economics, and public safety. The alternatives criteria should also incorporate substantive issues identified during the public scoping process and tribal consultation. The EIS should discuss the rationale and basis for how these criteria were developed.

Range of Reasonable Alternatives. The proposed alternatives to be evaluated in the EIS should represent the full spectrum of actions that could fulfill the purpose and need for this project. The range of reasonable alternatives should not only evaluate different rail alignments and right-of-ways (ROWs). We recommend that the EIS include reasonable alternatives and would request that the following be considered:

- A rail line extension ROW along the North side of the Tanana River and parallel to the Richardson Highway;
- A surface highway along the South side of the Tanana River

Alternatives that were considered but rejected from further evaluation should also be discussed in the EIS. The basis and rationale for why such alternatives were rejected should be included and based on the alternatives criteria.

Early involvement and continued coordination on the proposed range of reasonable alternatives is an effective way to capture and address ideas and concerns of interested parties. Such an approach allows for project refinements and adjustments which could minimize project delays later in the process. For example, we encourage STB to provide the range of reasonable alternatives to Tribes, agencies, and the public for review and comment prior to selection of the preferred alternative and release of the Draft EIS.

RESOURCES OF CONCERN

Aquatic Resources. Project construction, operation, and maintenance will likely affect aquatic resources: water quality, open water habitats, wetlands, stream channels, and riparian areas. These resources will experience varying degrees of encroachment and alteration of their hydrologic functions, and project encroachment may degrade the habitat for fish and other aquatic biota. For any impacts that cannot be avoided through siting and design, the EIS should describe the types, location, and estimated effectiveness of best management practices (BMPs) applied to minimize and mitigate impacts to aquatic resources.

The EIS should describe aquatic habitats in the affected environment (e.g., habitat type, plant and animal species, functional values, and integrity) and the environmental consequences of the proposed alternatives on these resources. Impacts to aquatic resources should be evaluated in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform.

The proposed activities would require a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers (ACOE). For wetlands and other special aquatic sites, the Section 404(b)(1) guidelines establish a presumption that upland alternatives are available for non-water dependent activities. The 404(b)(1) guidelines require avoidance, minimization, and compensation for unavoidable wetland impacts. The EIS should discuss in detail how planning efforts (and alternative selection) conform with Section 404(b)(1) guidelines sequencing and criteria. The EIS should discuss alternatives that would avoid wetlands and aquatic resource impacts from fill placement, construction, and other activities before proceeding to minimization/mitigation measures.

To meet the requirements of the Clean Water Act, the EIS should identify all water bodies and aquatic resources likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters.

Ecological Connectivity. The proposed 80-mile-long rail line could potentially contribute to fragmentation and direct loss of terrestrial and aquatic habitat. We have concerns that the rail extension may create a barrier to free migration and movement of terrestrial and aquatic species in the Tanana Flats/River Valley. In addition, there may be potential effects on the ecological processes, such as hydrology, movement of nutrients and sediment. The EIS should evaluate and discuss the potential adverse impacts to the ecological connectivity and ecological processes of the project area. The EIS should identify the critical areas of terrestrial wildlife movement and stream crossings, and measures and opportunities for maintaining existing wildlife crossings and corridors for resident species. Furthermore, there is a potential for collisions between locomotives and terrestrial wildlife crossing the rail line. Measures should be included to avoid and minimize such conflicts. Mitigation measures should be provided in the EIS to ensure safe movement of wildlife within the project area. The rail line should be designed to maintain the integrity of natural ecological processes, particularly hydrological processes and connectivity.

Invasive Species. Ground disturbing activities provide an opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, the EIS should evaluate the potential impacts resulting from the introduction of non-native invasive species. This evaluation should identify the types of invasive species and discuss the potential pathways for introduction of such species during construction and operation of this project. During construction activities, we recommend that disturbed areas be revegetated using native species and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasive species in areas disturbed by project activities.

ENVIRONMENTAL CONSEQUENCES

The EIS should provide a detailed environmental baseline within the project area and the environmental consequences (e.g., direct, indirect, and cumulative impacts) associated with each proposed action alternative, including the no action alternative.

Direct Effects. The direct effects should include those caused by the construction, operation and maintenance of the Northern Rail Line Extension. If the purpose and need for this action is to provide access for military training, then the direct effects of the military training on the environmental resources should be evaluated. Military training sites, such as the Tanana Flats/Blair Lakes and Donnelly areas cover over one million acres of the project area. The potential effects from military training and maneuvers on these resource areas should be analyzed and discussed in the EIS. The types of military training, equipment used, and frequency of training should be considered in the evaluation of direct effects to the resource areas.

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Indirect (Induced) Effects. There may be potential adverse indirect (induced) effects resulting from this project. We recommend that the EIS thoroughly evaluate and discuss the indirect (induced) effects resulting from the construction and operation of the Northern Rail Extension project. This evaluation should include both short-term and long-term effects. The following development activities and actions should be addressed in the EIS:

- Urbanization – residential, commercial, industrial
- Economic Development
- Transportation – highways, rail lines (Alaska to Canada Rail Link), airstrips, ports/harbors, and other infrastructure
- Energy – electric power lines/grids, natural gas pipeline
- Resource Extraction – hard rock, coal, coal bed methane, oil and natural gas
- Tourism and recreation – fishing, hunting, trapping, snow machining,
- Subsistence – fishing, hunting, trapping, berry picking
- Agriculture – timber harvesting, farming, livestock
- Military – National Missile Defense (NMD)

Land Use Planning. Indirect (induced) effects include potential for long-term unplanned and unmitigated development resulting from this project, which could be a concern. Presently, there is minimal development within the Tanana River Valley. This area supports extensive wetlands and aquatic resources, wildlife habitat, and important fish bearing streams. We recommend that the EIS analyze and disclose the indirect (induced) effects of unplanned and unmitigated future development within the project area in the absence of any comprehensive land use plan. The analysis should discuss the environmental, social, and economic consequences. EPA recommends that a commitment be made to work collaboratively with local, state, and federal governments, private property owners, and interested parties to develop a comprehensive land use plan for the Tanana River Valley to guide future indirect (induced) growth and development in the project area.

CUMULATIVE EFFECTS ANALYSIS

This EIS should describe in detail the assumptions, methodology, and framework for developing the cumulative effects analysis (CEA) that is consistent with CEQ's guidance for *Considering Cumulative Effects under the National Environmental Policy Act*. The EIS should establish the geographic scope and timeframe for the CEA.

Reasonably Foreseeable Future Actions. As part of the CEA, the EIS should evaluate the past, present, and reasonably foreseeable future actions associated with this project. The reasonably foreseeable future actions should include those actions that may occur in areas within and adjacent to the project area. Examples of reasonably foreseeable future actions that should be considered in the EIS include the following:

- Alaska-Canada Rail Link
- Natural Gas Pipeline
- Fairbanks Intermodal Transportation Center (FITC)

When identifying reasonably foreseeable future actions to be addressed in the CEA, criteria should be developed to systematically separate those actions which are "reasonably foreseeable future actions" versus those that are considered "speculative or distant actions." Criteria to identify the reasonably foreseeable future actions could be based on the geographic scope and timeframe identified for this cumulative effects analysis.

Regional Climate Change. There is growing scientific evidence to support the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Climate change should be considered a reasonably foreseeable future impact and should be evaluated through the NEPA process. This EIS should consider how changing conditions due to climate change could potentially influence STB's proposed actions and should also consider how the proposed actions, alternatives, goals and objectives may influence the emissions and sinks of greenhouse gases, contributing to or reducing impacts to climate change.

PUBLIC PARTICIPATION AND ENVIRONMENTAL JUSTICE

The EIS should describe what efforts will be taken to ensure effective and meaningful participation by Tribes and the public. We recommend that Tribal and Public Participation Plans be developed and implemented for this project. These plans should outline and describe the process for engaging Tribes and the public in the development of the EIS so that there is a commitment and understanding of the participation process.

The proposed action may result in disproportionately high and adverse human health or environmental effects to minorities and/or low income populations within the project area. The EIS should include an Environmental Justice (EJ) analysis which would include all possible measures to identify community issues, as part of the scoping or an ongoing process, and how the information was used. The EIS should discuss how the affected communities have had meaningful input on the decisions making process for this project. The EIS should describe what was done to inform the EJ communities about the project and the potential impacts it would have on their communities. As a recommendation, the EJ analysis for this EIS should include the following level of information:

- Description of the efforts that have/will be taken to inform the communities about the impacts of the project and to ensure "meaningful public participation" by the potentially impacted communities/individuals;
- Identify low income and people of color (minority) communities in the impact area(s) of the project;
- Detail in the EIS, what was heard from the community about the project during the public participation sessions by detailing the impacts identified by you and the communities (perceived and real);
- Address whether these impacts are likely to occur and to whom and evaluate all impacts for their potential to disproportionately impact low income and/or people of color (minority) communities;

- Describe how what was heard from the public was/will be incorporated into the decisions that were made about the project (such as the development of alternatives or choice of alternatives).
- Propose off-setting mitigation for the impacts that will or are likely to occur.

TRIBAL CONSULTATION

Based on our experience working with Tribes in Alaska, a Tribal Government-to-Government Consultation plan is often used in outline the process for working effectively with Tribal Governments. EPA does not consider public meetings to fulfill the requirement for Tribal Government-to-Government consultation. A Tribe does not have to be formally designated a Cooperating Agency for this project in order for Government-to-Government consultation to occur. Consultation and coordination with Tribal Governments should continue well after the scoping process by maintaining regular meetings. Whether these meetings occur face to face in local communities, telephone conference calls, or statewide tribal conferences, continuous engagement with Tribes is an important element in meaningful Tribal involvement in the NEPA process.

Traditional Ecological Knowledge. The Tribal Government-to-Government consultation process is an opportunity to gather traditional ecological knowledge (TEK) about local subsistence resources, usual and accustomed use areas, and cultural resources. Traditional Ecological Knowledge, in addition to strong scientific data, should be used to develop alternatives, evaluate the environmental consequences of project alternatives, and identify appropriate mitigation measures. Furthermore, we recommend that the EIS integrate TEK into the NEPA planning process and use TEK to assist the STB in making a decision regarding this project.

COST-BENEFIT ANALYSIS

The EIS should provide an overall cost-benefit analysis for this project. This cost estimate should include an itemized breakdown of the proposed costs for construction and operation of each proposed action alternative, as well as the benefits associated with each. In addition, the EIS should include a discussion of the underlying methodology, assumptions, and framework for this analysis. This analysis is important to compare the relative costs and benefits associated with each action alternative and to provide for better public understanding of how economic factors are considered in the agency decision-making process. Furthermore, during the Clean Water Act Section 404 permit application review, the cost-benefit analysis would be used to determine the "practicability" of the agency preferred alternative.

ACCIDENTAL SPILLS

Characterization and Evaluation of Risk. The proposed Northern Rail Extension project would be constructed and operated between North Pole and Fort Greeley (80 miles) for the movement of military personnel, equipment, supplies, weaponry, civilians and commercial freight. The proposed rail line would be constructed adjacent to the Tanana River, and would eventually cross the Tanana River and the Delta River. With additional access to remote areas and movement of freight and military equipment/supplies, there is an increased risk of potential

spills of materials into waters of the United States, including wetlands. To address the concern of the potential for accidental spills associated with this project, we recommend that the EIS include a characterization of the type of accidental spills, and evaluation of the risks associated with accidental spills from materials being transported along the Northern Rail Extension during frozen and unfrozen conditions. This evaluation should include an inventory of the different types of materials (hazardous, non-hazardous, etc.) that may potentially be transported via this new rail line, and an assessment of their environmental and public health effects. The EIS should also include a discussion of the volumes and frequency for which this material may be transported along the rail line.

Spill Response Planning. The EIS should discuss the potential spill response planning for this project in the event of an accidental spill in both frozen and unfrozen conditions. Our concern is that in more remote areas of Alaska, the response time to the site would be extended. The EIS should describe the spill response planning process and measures that would be taken to respond to accidental spills in the project area.

MITIGATION MEASURES

Mitigation measures should be included in the EIS to avoid, minimize, rectify, reduce, and compensate for project impacts. The EIS should describe the mitigation measures that would be implemented for this project. Mitigation measures identified during scoping, tribal consultation, public and agency coordination should be reflected in the development of the range of reasonable alternatives.

EIELSON BRANCH REALIGNMENT

It is our understanding that the project proponent, ARRC, is pursuing the Eielson Branch Realignment project concurrent with the Northern Rail Extension project in the Fairbanks/North Pole area. The Eielson Branch Realignment project proposes to reconstruct 16 miles of existing track between Fort Wainwright and Eielson Air Force Base. The Federal Railroad Administration (FRA) and the Federal Transit Administration (FTA) are the Federal co-lead agencies which are planning to prepare an Environmental Assessment for the Eielson Branch Realignment.

NEPA allows for integration of processes into early planning and combining environmental documents with other documents to reduce delay and duplication of effort. The Northern Rail Extension project appears to be dependent upon the Eielson Branch Realignment project as a connected action and may best be evaluated in one NEPA document.

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT/PERMITTINGState of Alaska Scoping Comments
January 13, 2006

FLANK H MURKOWSKI, GOVERNOR

SOUTHCENTRAL REGIONAL OFFICE
ANCHORAGE, ALASKA 99501
PH: (907) 269-1400 FAX: (907) 269-3981

January 13, 2006

Surface Transportation Board
Case Control Unit
1925 K Street, NW
Washington, D.C. 20423-0001
Attention: David Navecky
Environmental FilingRe: STB Finance Docket No. 34658, The Alaska Railroad Corporation – Petition for
Exemption to Construct and Operate a Rail Line Between Eielson Air Force Base
(North Pole) and Fort Greely (Delta Junction), Alaska

The State of Alaska has reviewed the November 1, 2005 Notice of Intent from the U.S. Surface Transportation Board (STB) to prepare an Environmental Impact Statement (EIS) for the proposed Alaska Railroad Corporation (ARRC) Northern Rail Extension, in which the ARRC proposes to construct and operate approximately 80 miles of new railroad line between North Pole and Delta Junction, with an approximately 15-mile spur to the Blair Lakes Military Training Area. The following comments represent the consolidated views of the State's resource agencies.

DRAFT SCOPE OF STUDY

The Notice of Intent requests comments on the included Draft Scope of Study for the EIS. In general, the State supports the scope as presented.

Potential interactions between permafrost changes (4. Geology and Soils) and surface water and ground water (3. Water Resources) need to be explicitly addressed in an appropriate section because of the high biological resources values of many of these waters in the project area. Similarly, project effects associated with potential changes in river, side channel, and stream ice formation, development, and break-up need to be addressed. Proposed material sources and sites need to be identified and included in the impacts analysis of an appropriate section. The cumulative training effects analysis should include effects of increased training intensity, duration, and seasons of use.

BIOLOGICAL RESOURCESWildlife

The Tanana River riparian corridor provides high value habitat for a variety of wildlife species (including big game, furbearers, and raptors) although there are currently few

site-specific data available at a scale appropriate for identification of potential project effects.

The EIS should address the wide range of bird species using the project area. This includes raptor nesting (cliffs along the Tanana River are well-known peregrine falcon nesting locations, and bald eagle nests are present adjacent to the river), winter and nesting season use of the Tanana Flats south of the river by hawk-owls and great gray owls, trumpeter swan nesting areas, lesser sandhill crane nesting and staging areas, and potential habitat for nesting rusty blackbirds. The latter is a species in major decline throughout their North American range, and is believed to nest in the project area. The project area has one of the highest moose densities in the state, and the Alaska Department of Fish & Game (ADF&G) is under legislative direction to provide high densities and high harvest levels. As such, potential alterations to moose habitat, calving and concentration areas and travel corridors will need to be addressed, and moose strike by trains is perhaps the greatest wildlife concern of the proposed action. To adequately address these issues, the Office of Habitat Management and Permitting (OHMP) recommends that surveys be conducted to identify and quantify concentration areas, travel corridors, and use patterns during the snow period.

As currently proposed, the ARRC Northern Rail Extension is not expected to directly affect the Delta Junction Bison Range. However, an increase training activities associated with increase access or mobility in the area west of Fort Greely has the potential to affect the Delta Bison Herd. We recommend that the EIS address potential effects of increased training activities on both sides of the Delta River to the herd.

For management purposes, the project area lies within ADF&G Game Management Unit 20: Fairbanks – Central Tanana. That portion south of the north bank of the Tanana River is within Subunit 20A, that portion north of the north bank of the Tanana River is within Subunit 20B, and that portion east of the west bank of the Delta River is within Subunit 20D.

Potential mitigation measures to reduce project effects on wildlife include keeping the alignment as far away from the Tanana River floodplain as possible, avoiding cliffs with raptor habitat, crossing the Tanana River as far upstream as possible, avoiding the moose calving area on the south side of the Tanana River southwest of Eielson Air Force Base, and reducing vegetation alterations and minimizing clearing limits to reduce the attraction of moose to the track corridor. Proposed protocols for monitoring and reporting moose strikes and kills (by location, fate, sex, and age) would also be appropriately addressed.

Fish

Fish habitat in and near the project area (including associated sheet, discrete surface, hyporheic, oxygenated groundwater, and deep groundwater sources and flows it depends on) is diverse, productive, and complex. Potential project effects on fish resources include alterations of surface and subsurface hydrologies from roadbed placement, grade

State of Alaska Scoping Comments
January 13, 2006

Cuts and fills, potential changes (more, less) in permafrost and active layer depths beneath fill material, type and locations of crossings, and accommodation of ice formation and passage at crossing structures. Proposed crossings of the Tanana River, Little Delta River, Delta Creek, and the Delta River will need to address not only fish passage but also downstream passage of debris, torrential flows, and ice formation from the glacial systems that feed them.

ADF&G typically conducts aerial surveys in November documenting spawning activity from Benchmark 735 Slough (near S2a MP 7-10) to the Delta River. Upwelling water systems remain open late into the winter, sometimes all winter. However, there are numerous channels and small systems along the south bank that are not surveyed because they are not accessible. Some surveys for juvenile fish on the south bank indicated presence of rearing coho and Chinook salmon in these areas. The lower 2 miles of the Delta River is one of the largest visible sources of upwelling water and the lower ¼ mile is protected under an Interagency Land Management Assignment for the conservation of critical fall chum salmon spawning habitat. Table 1 provides a listing of water bodies currently specified as anadromous.

TABLE 1. Water bodies crossed by or adjacent to the ARRC Northern Rail Extension potential alignments, that have been specified by the Deputy Commissioner as being important for the migration, spawning, or rearing of anadromous fishes in accordance with AS 41.14.870(a). Names in quotation marks are local names; others follow USGS maps. Anadromous water bodies and many others in the project area also provide spawning and rearing habitat for a variety of resident fish species including Arctic grayling, burbot, Dolly Varden, northern pike, and whitefish species.

Water Body	Fish Species*	Stream Number
Tanana River	CH, CO, K	334-40-11000-2490
Salchaket Slough	CH, K	334-40-11000-2490-3290
Piledriver Slough	CH	334-40-11000-2490-3315
Twentythree Mile Slough	CH	334-40-11000-2490-3315-4010
Little Salcha River	CH	334-40-11000-2490-3325
Salcha River	CH, K	334-40-11000-2490-3329
"Fivemile Clearwater River"	CO	334-40-11000-2490-3338
unnamed clearwater tributary to Tanana River	CO	334-40-11000-2490-3356
unnamed clearwater tributary to Tanana River	CO	334-40-11000-2490-3362
Clear Creek ("Richardson Clearwater River")	CH, CO	334-40-11000-2490-3370
"Providence Creek"	CO	334-40-11000-2490-3376
"North Creek"	CO	334-40-11000-2490-3378
"Whitstone Creek"	CO	334-40-11000-2490-3382
Delta River	CH, CO	334-40-11000-2490-3390

*Fish Species: CH = chum salmon, CO = coho salmon, K = chinook salmon

State of Alaska Scoping Comments
January 13, 2006

The Tanana River is an important migratory route for anadromous salmon returning to their natal streams. The Chena, Salcha, and Goodpaster Rivers on the north bank of the Tanana River produce the majority of the Chinook and summer chum salmon while numerous major and minor tributaries entering the Tanana River floodplain on the south bank such as the Delta, Delta Clearwater, and Richardson Clearwater rivers are large producers of fall chum and coho salmon. Fall chum salmon are known to target specific upwelling groundwater spring habitat adjacent to and within the Tanana River floodplain. This habitat type is concentrated along the south bank of the Tanana River from Benchmark 735 Slough (adjacent to the Silver Fox Lodge) upstream to near the mouth of the Gerstle River.

Economically and socially, Chinook salmon are the most valuable stock to the people of the Yukon River drainage. These salmon are important for both commercial markets and provide for one of the largest subsistence fisheries within the state. Within the Tanana River drainage Chinook salmon are also harvested in personal use and sport fisheries. On average, based on genetic stock analysis, nearly 25% of the annual Yukon River commercial Chinook salmon harvest is composed of Tanana River drainage stocks. Juvenile Chinook salmon utilize rearing habitat on both the north and south banks of the Tanana River and remain in these freshwater habitats for 1-2 years before outmigrating to the Bering Sea.

Summer chum salmon are usually the most abundant salmon species within the Yukon River drainage. Summer chum salmon are an important subsistence resource, particularly for residents of the lower Yukon River. The Tanana River has produced large numbers of summer chum salmon and is the upper extension of this species' range. Few summer chum salmon migrate above the Tanana River's confluence with the Yukon River. The average (1995-2005) Yukon River total summer chum run size is estimated to be 1.4 million fish, of which the Tanana River stocks may contribute nearly 30%. The Yukon River summer chum run has ranged from less than 500 thousand fish during the recent crash (2000-2001) to 4 million fish (1995). Juvenile chum salmon do not rear in fresh water, instead they outmigrate to the sea soon after they emerge from the gravel.

Fall chum salmon are an important subsistence resource for the Yukon River people including many living in the communities along the Tanana River. Commercial markets are primarily available at the mouth of the Yukon River for ocean bright products taken from mixed stocks and on the Tanana River for value added products. Fall chum salmon are less abundant than summer chum salmon since their habitat requirements are much more restrictive. Preferred spawning areas for fall chum salmon are limited to upwelling ground water. This ground water has a consistent temperature (typically 4-6°C) higher than that of river water, and provides for accelerated maturation time since fall chum spawn much later in the season (October-November) than do summer chum (August-September). This accelerated maturation enables the later spawning fall chum salmon to emerge and outmigrate with the earlier spawned summer chum salmon during high flows in the spring. On average in recent years (2000 - 2004) the Tanana River has produced 37% of the total Yukon River fall chum salmon run.

*State of Alaska Scoping Comments
January 13, 2006*

reduce flood flows and provide habitat stability. Additional areas of concern include the Fivemile Clearwater and upper Richardson Clearwater rivers.

SUBSISTENCE

Although the proposed railroad extension corridor lies within the Fairbanks Nonsubsistence Area, approximately 26 rural communities not including Fairbanks annually participate in subsistence fisheries on stocks originating in the Tanana River. Subsistence and personal use mixed stock fisheries on the Tanana River and Yukon River systems downstream from the project site (excluding the Koyukuk River) annually harvested 36,000 Chinook salmon, 85,000 summer chum salmon, 45,000 fall chum salmon, and 22,000 coho salmon on average between 1994 and 2003.

We encourage consultation with Tanana Chiefs Conference, Inc. during preparation of the draft EIS.

RECREATION and ACCESS

The potential for the project to affect the passage of boats, including airboats, is also a significant concern for the entire Tanana River corridor, and the clearwater side channels and tributaries such as the Fivemile Clearwater River. Water craft used range from onboard jetboats to inboard jets with cabins to some airboats. Therefore, any crossing structure would need to clear the height of an airboat with CB antenna to assure continuance of existing waterborne access.

In addition to water craft passage, the project has the potential to restrict public surface access to and from the Tanana River. Surface access to the Tanana Flats for off road vehicles (ORV) and foot travel is extremely limited and the public has requested additional opportunities for surface access.

The impact to future access for Salcha, Delta Junction and other communities along the proposed expansion should be evaluated. A railroad route through or around a community can create access limitations to existing and future transportation infrastructure (highways, airports, river access) and adjacent lands. The EIS should identify alternatives with the least impact to the existing transportation systems and identify mitigation for unavoidable transportation impacts.

The EIS should also consider the impact of new road/railroad crossings created by the proposed project. The State of Alaska Department of Transportation and Public Facilities has worked with the ARRC to construct separated grade crossings at numerous locations on the national highway system (NHS). Available funding for these improvements is limited. The costs of constructing additional separated grade intersections on the NHS and on other high volume routes should be considered as part of the project and the EIS should consider alternatives to reduce the number of road crossings, where practicable.

6

*State of Alaska Scoping Comments
January 13, 2006*

Yukon River coho salmon are similarly a small stock but the majority of the fish are believed to be bound for the Tanana River drainage. Large concentrations of coho salmon are found in the Delta Clearwater River, the only system with an escapement goal. Coho salmon are harvested incidentally to fall chum salmon in both the Yukon River subsistence and commercial fisheries. Additionally, coho salmon support a popular sport fishery within the Tanana River drainage. Similar to Chinook salmon, juvenile coho salmon remain in fresh water for 1-2 years before outmigrating to the sea. Tanana River coho salmon primarily use systems on the south bank of the Tanana River as rearing habitat although some rearing occurs in north bank systems such as Shaw Creek and the Goodpaster River.

We have little fish data for the glacial Little Delta River, Delta Creek, and Jarvis Creek other than seasonal use by resident fish species including Arctic grayling and other species such as whitefish for migratory corridors between overwintering habitat in the Tanana River and spawning and rearing habitats in their upper basins. The mouth of Delta Creek is partially tied into the mouth of the Richardson Clearwater River, a major coho and grayling stream with high human use. Each of these streams have clearwater tributaries in their upper reaches that are believed to provide resident fish spawning, rearing, and perhaps overwintering habitats.

The Delta River is similar to the other glacial tributaries, except for its lower mile or so. In this lower reach, the Delta River provides spawning habitat for fall chum salmon. The Delta River Interagency Land Management Assignment between the Alaska Department of Fish and Game and the Alaska Department of Natural Resources provides for management of approximately 547 acres in the lower ¼ mile of the Delta River for fall chum salmon spawning habitat. The area covered by this agreement typically provides a significant proportion of the total Tanana River basin fall chum spawning area. There are a myriad of clearwater streams and tributaries along the whole southside floodplain and benchlands of the Tanana River in this area, many of which provide important spawning and rearing habitat for anadromous and resident fish species. As specific crossing locations are designated, the EIS needs to identify all fish species and life stage using those locations.

For management purposes, the project area lies within the ADF&G Division of Commercial Fish Yukon River District 6, ADF&G Division of Sport Fish Lower Tanana and ADF&G Division of Sport Fish Upper Tanana Management Areas.

The greatest potential mitigation measure to reduce project effects on fish populations is to avoid the Tanana River floodplain because of its multiple highway and clear runoff channels, spawning and rearing habitat, and tributaries systems. By staying well back from the Tanana, near to or up on the terrace break on the south side, many of the wetlands, surface and subsurface flow, and fishbearing waters issues with previous conceptual alignments may be avoided. The exception to this is the Piledriver Slough/Twentythree Mile Slough area. Although this area is highly productive, OHMP and ADF&G area willing to work with the applicant to develop alignments that could

5

EO-244

SURFACE TRANSPORTATION BOARD
Washington, DC 20423



Office of Economics, Environmental Analysis and Administration

October 12, 2005

Mr. James Helfinstine
Waterways and Navigation Branch (OAN-3)
Seventeenth Coast Guard District
P.O. Box 25517
Juneau, Alaska 99802-5517

Re: STB Finance Docket No. 34638, The Alaska Railroad Corporation - Petition for
Exemption to Construct and Operate a Rail Line Between Eielson Air Force Base
(North Pole) and Fort Greely (Delta Junction), Alaska

Dear Mr. Helfinstine:

I am writing to invite you to be a cooperating agency in the preparation of an
environmental review described below:

The Alaska Railroad Corporation (ARRC) intends to file a petition with the Surface
Transportation Board (Board), pursuant to 49 U.S.C. 10502, requesting authority to construct
and operate a new rail line from Eielson Air Force Base to Fort Greely, Alaska. The proposed
project would involve the construction of approximately 80 miles of new rail line connecting the
existing rail line near Eielson Air Force Base near North Pole, Alaska to a point near Fort Greely
and the Donnelly Training Area near Delta Junction, Alaska. The proposed rail line would cross
the Tanana River, possibly near Flag Hill, allowing the U.S. Army year-round access to the
Tanana Flats and Donnelly training areas. The proposed project could also include the
construction of a 15-mile spur line from the vicinity of Flag Hill to the Blair Lakes Military
Training Area. Construction of the proposed rail line would provide all the major military
installations in Alaska with rail access to the Port of Anchorage. ARRC also intends to provide
passenger rail service between Fairbanks and Delta Junction, and as a common carrier, ARRC
would be obligated to provide freight rail service upon request to any future shippers on the
proposed line.

The construction and operation of this project has the potential to result in significant
environmental impacts. Therefore, the Board's Section on Environmental Analysis (SEA) has
determined that the preparation of an Environmental Impact Statement (EIS) is appropriate.
SEA intends to issue the Notice of Intent to Prepare an Environmental Impact Statement and

State of Alaska Scoping Comments
January 13, 2006

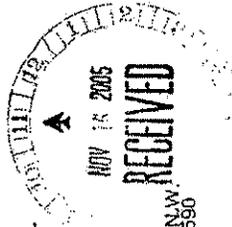
Finally, impacts to traffic levels on the Richardson Highway should be evaluated.
Changes to traffic volume and type, particularly increases in volume, can have a
significant impact on the maintenance of the Richardson Highway and the need for
additional capital projects to improve capacity. Limited funds are available for highway
maintenance and construction.

Thank you for the opportunity to provide comments on this action. We remain available
to discuss these comments and look forward to working with the STB and ARRC as the
EIS is developed.

Sincerely,

Don Perrin
Project Management and Permit Coordinator

- cc: Randy Bates, DNR/OPMP
- Don Young, ADF&G
- Fronty Parker, ADF&G
- Mac McLean, DNR/OHMP
- Jim Durst, DNR/OHMP
- Kerry Walsh, DNR/DMLW
- Judy Bittner, DNR/DPOR/SHPO
- Christy Miller, DCED
- Jeff Roach, DOT&PF
- Sue Sliffer, DOT&PF
- Ethan Birkholz, DOT&PF
- Jerry Rafson, DOT&PF
- Jim Powell, DEC
- Brett Flint, ARRC
- Michael Nagey, ENTRIX
- Mark Dalton, HDR Alaska



E1-1842

1120 Vermont Ave., N.W.
Washington, D.C. 20590



U.S. Department
of Transportation

Federal Railroad
Administration

NOV 10 2005

Victoria Rutson
Chief, Section of Environmental Analysis
Surface Transportation Board
Office of Economics, Environmental Analysis,
and Administration
Washington, DC 20423

Re: STB Finance Docket No. 34658, The Alaska Railroad Corporation –
Petition for Exemption to Construct and Operate a Rail Line Between
Eielson Air Force Base and Fort Greely, Alaska

Dear Ms. Rutson:

I am writing in response to your letter of October 12, 2005, inviting the Federal Railroad Administration (FRA) to be a cooperating agency in the environmental review of the proposed Alaska Railroad Corporation rail line extension from Eielson Air Force Base to Fort Greely, Alaska. Your letter indicates that, given the extent of the environmental impacts, the review will consist of an Environmental Impact Statement (EIS).

As the agency charged with regulatory oversight over the finished rail line as well as administration of the grant funds that may be used to build the line, FRA has a special interest in this project. Therefore, FRA accepts your invitation and would like to act as a cooperating agency in the preparation of the EIS. Thank you for the opportunity to participate and we look forward to working with the Surface Transportation Board and the other cooperating agencies on the EIS.

Sincerely,

Mark E. Yachmetz
Associate Administrator for
Railroad Development

Draft Scope of Study in the near future. SEA will also hold public scoping meetings as part of the EIS process.

Based on preliminary agency consultations that have been conducted by SEA and its third-party contractor (ICF Consulting, Inc.) for this proposed project, SEA believes that the project could impact properties under the jurisdiction of or use by a number of several Federal agencies including yours. Therefore, consistent with 40 CFR 1501.6, we are inviting the following agencies to be cooperating agencies in the preparation of this EIS on the basis of their special expertise or jurisdiction by law:

- U.S. Department of Defense, Alaskan Command,
- U.S. Department of Defense, U.S. Army Garrison – Alaska Command,
- U.S. Department of Defense, 354th Fighter Wing Command,
- U.S. Army Corps of Engineers – Alaska District,
- U.S. Department of Interior, Bureau of Land Management – Alaska State Office,
- U.S. Coast Guard, Seventeenth Coast Guard District,
- U.S. Department of Transportation, Federal Railroad Administration, and
- U.S. Department of Transportation, Federal Transit Administration – Region 10

If you have any questions, please feel free to contact Dave Navecky of my staff at 202-565-1593 (e-mail address: naveckd@stb.dot.gov), or Alan Summerville, ICF Consulting project manager, at 703-934-3616 (e-mail address: ASummerville@icfconsulting.com). I would appreciate your response by November 18, 2005. We look forward to working with you in the near future.

Sincerely,

Victoria Rutson
Chief
Section of Environmental Analysis

Rec'd 12/12/05
E1-1847

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

DECEMBER 6 2005



REPLY TO
ATTENTION OF:

Regulatory Branch
North Section

Ms. Victoria Rutson
Chief, Section of Environmental Analysis
Office of Environmental Analysis and Administration
Surface Transportation Board
Washington, DC 20423

Dear Ms. Rutson:

Thank you for your October 12, 2005, letter inviting us to be a cooperating agency in the preparation of an Environmental Impact Statement (EIS) for the Alaska Railroad Corporation's proposed new rail line between Eielson Air Force Base and Fort Greely, Alaska. We agree that portions of the proposed project could affect waters of the United States under our regulatory jurisdiction, and thus would require Department of Army (DA) authorization pursuant to Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act of 1899.

We are willing to be a cooperating agency in the preparation of the EIS, provided a Memorandum of Agreement (MOA) is jointly prepared and scrupulously followed that clearly documents our respective expectations, roles, and responsibilities, with the emphasis placed on producing a quality document, rather than meeting an estimated and inflexible schedule. One of our expectations would be that the final EIS contain sufficient information for us to make a permit decision, particularly the information required to determine compliance with the Section 404(b)(1) Guidelines (40 Code of Federal Regulations Part 230) and our public interest review (33 Code of Federal Regulations Part 320). The goal would be to ensure that our review process is integrated and concurrent with the EIS to the fullest extent possible in accordance with 40 Code of Federal Regulations Part 1502.25.

We look forward to working with you on the preparation of the MOA. Our point of contact in this effort will be Ms. Christy Everett. You may contact her by email at christy.a.everett@poa02.usace.army.mil, by phone at (907) 474-2166, by FAX at (907) 474-2164, or by mail at 3437 Airport Way, Suite 206, Fairbanks, Alaska, 99709-4777.

Sincerely,

Steve Meyers
Steve Meyers
Chief, North Section

Rec'd 12/22/05
E1-1849

DEPARTMENT OF THE AIR FORCE
PACIFIC AIR FORCES



DEC 5 2005

Brigadier General Marke F. Gibson
354 FW/CC
354 Broadway St Unit 19A
Eielson AFB AK 99702-1899

Ms. Victoria Rutson
Chief, Section of Environmental Analysis
Surface Transportation Board
Washington DC 20423

Dear Ms. Rutson

I accept your invitation for the 354th Fighter Wing at Eielson AFB to be a cooperating agency in the preparation of an Environmental Impact Statement (EIS) for the extension of the Alaska Railroad to Fort Greely, Alaska. The project you describe will impact this installation and community. I concur that Eielson's participation in the EIS process is necessary and appropriate for a full and open engagement on project issues important to this base.

My point of contact is Mr. Mike Lee, 354th Mission Support Group Deputy, (907-377-3433, michael.lee@eielson.af.mil). When communicating with Eielson AFB on environmental specifics, please include Mr. Jim Nolke, Environmental Planning Manager, (907-377-3365, 354 CES/CEVP, james.nolke@eielson.af.mil).

Sincerely

MARKET GIBSON
MARKET GIBSON
Brigadier General, USAF
Commander

Rec'd 12/9/05

EI - 1846

HEADQUARTERS
ALASKAN COMMAND (ALCOM)
ELMENDORF AIR FORCE BASE, ALASKA 99506



Lieutenant General Douglas M. Fraser
Commander, Alaskan Command
9480 Pease Avenue, Suite 101
Elmendorf AFB AK 99506-2100

Ms. Victoria Rutson
Chief, Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington DC 20423-0001

Dear Ms. Rutson

We accept your invitation to be a cooperating agency in the environmental review of the Alaska Railroad Corporation petition for operation and construction of a rail line from Eielson Air Force Base to Fort Greely, Alaska. I think it is important for Alaskan Command to participate in the environmental planning process. My point of contact is Colonel Paul Curtis, ALCOM/J4, 9480 Pease Avenue, Suite 216, Elmendorf Air Force Base, Alaska. 99506-2100. You may contact him by phone at (907) 552-7013 or via email at paul.curtis@elmendorf.af.mil.

If you have not already done so, in addition to those listed on your letter, I recommend you also invite the Commander, U.S. Army Garrison - Fort Greely and the Director, Ground-Based Midcourse Defense Operations Support Group Alaska to participate. As the federal property manager or federal agency this project may affect, they too have an interest in the rail project and their involvement at this early stage will further enhance your environmental planning effort.

Again, thank you for your invitation. We look forward to working with you and the Surface Transportation Board on matters of mutual interest.

Sincerely

DOUGLAS M. FRASER
Lieutenant General, USAF
Commander

Guardian of the North

Red 1/17/06

EI - 1856



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Alaska State Office
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7599
<http://www.ak.blm.gov>

TAKE PRIDE
IN AMERICA

28 NOV 2005

1793 (AK-932)

DEC 20 2005

Ms. Victoria Rutson, Chief
Section of Environmental Analysis
Office of Economics, Environmental Analysis, and Administration
Surface Transportation Board
Washington, D.C. 20423

Re: STB Finance Docket Number 34658, The Alaska Railroad Corporation-Petition for Exemption to Construct and Operate a Rail Line Between Eielson AFB and Fort Greely, Alaska.

Dear Ms. Rutson:

This responds to your letter of October 12, 2005, on behalf of the Surface Transportation Board to Gary Foreman inviting the Bureau of Land Management (BLM) to be a cooperating agency on the Environmental Impact Statement for a new rail line from Eielson Air Force Base, Alaska to Fort Greely, Alaska. The BLM is interested in becoming a cooperating agency in the Environmental Impact Statement process for the State of Alaska's proposed railroad construction. Cooperation may expedite agency NEPA compliance for the project.

The BLM has not received a right of way application from the State of Alaska. However, a right of way grant from the BLM under Title V of the Federal Land Management Policy Act is required for this project. A minimum of 5 to 6 miles of the proposed railway alignment involves land managed by the BLM.

The BLM wishes to enter into a Memorandum of Understanding (MOU) with your agency since the Surface Transportation Board intends to lead the environmental review. The MOU should name agency contacts, and identify the lead and cooperating agency responsibilities as required in 40 CFR 1501.6 (a) and (b). The MOU will also identify special resource needs, data requirements, and issues to be addressed in the analysis.

EO-303

Project coordination will be the responsibility of the BLM, Fairbanks District Office, Fairbanks, Alaska. Please feel free to contact Mr. Gary Foreman, Planner and Environmental Specialist, at (907) 474-2339.

Sincerely,



Henri R. Bisson
State Director

Acting



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

April 5, 2006

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Ave., Suite 1310
Anchorage, AK 99501-3565

Re: STB Finance Docket No. 34658, The Alaska Railroad Corporation – Petition for Exemption to Construct and Operate a Rail Line Between Eielson Air Force Base (North Pole) and Fort Greely (Delta Junction), Alaska

Dear Ms. Bittner:

I am writing to ask for your approval of a site location model and survey strategy described in detail below and enclosed. I have also provided some background information about the proposed project, which I understand you are acquainted with, as well as an explanation of how we anticipate implementing the model and survey, subject to your review and approval.

Background

The Alaska Railroad Corporation intends to file a petition with the Surface Transportation Board (Board), pursuant to 49 U.S.C. 10502, requesting authority to construct and operate a new rail line from North Pole to Delta Junction, Alaska. The Board would be the Federal agency responsible for granting authority for the construction and operation of the proposed new rail line. The Section of Environmental Analysis (SEA) is the office within the Board responsible for preparing the appropriate National Environmental Policy Act (NEPA) documentation for railroad construction and operation cases that come before the Board.

As previously communicated to you, SEA is preparing an Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of the Northern Rail Extension Project, including consideration of cultural resources. ICF Consulting is serving as the independent third-party consultant to assist SEA with the EIS. Northern Land Use Research, Inc. (NLUJR) is the cultural resources subcontractor to ICF Consulting.

EI-2469

FRANK H. MURKOWSKI, GOVERNOR

550 W 7th Ave, SUITE 1310
ANCHORAGE, ALASKA 99501-3665
PHONE: (907) 269-8721
FAX: (907) 269-8908

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

May 9, 2006

File No.: 3130-1R Surface Transportation Board

SUBJECT: Construct and operate rail line between Eielson Air Force Base (North Pole) and Fort Greely (Delta Junction), Alaska

Victoria Rutson
Surface Transportation Board
Office of Economics, Environmental Analysis and Administration
Washington, DC 20423

Dear Ms. Rutson,

The State Historic Preservation Office received on April 6, 2006, your letter regarding the referenced project and the attached report titled *Site location model and survey strategy for cultural resources in the Alaska Railroad Northern Rail Extension Project area* by Northern Land Use Research, Inc. (December 2005). We also met/teleconferenced with Dave Navecky (SEA Project Manager), Alan Summerville (ICF Consulting), Bob King (BLM) and Peter Bowers and Ben Potter (NLUJR) on April 19, 2006 regarding this project. Based on the meeting and our review of the report, we find the proposed site location model and survey strategy acceptable.

Please contact Stefanie Ludwig at 269-8720 if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:sll

Cc: Alan Summerville, ICF Consulting Service, LLC

Description of the Site Location Model and Survey Strategy

Following consultation with your office, NLUJR has prepared the enclosed site location model and survey strategy in order to provide the SHPO and other regulatory agencies with the data and information necessary to permit a cultural resource survey of the proposed railroad alignments. The site location model -- developed within a Geographic Information System (GIS) framework -- is used to demarcate high-moderate and low probability areas for the location of cultural materials within the project area. Using the site location model, we believe that we will be able to maximize the discovery of cultural resources and to optimize survey strategies (level of intensity and efficiency of different survey types).

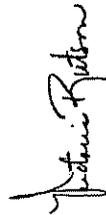
Based on our research, high-moderate probability areas for site location would be ground surveyed (119.7 linear km, 28% of total proposed alignments), and low probability areas would be surveyed through low-altitude, low-speed helicopter overflight and spot ground testing (304.7 km, the remaining 72% of the total proposed alignments). Verification measures for the model have been built in by incorporating these alternative field survey strategies. Since all of the alignments will be surveyed to some level, a more refined model can be constructed on the basis of data gathered during the course of the proposed 2006 fieldwork.

The results of the 2006 field survey will be incorporated into the EIS. The ground survey is defined as the minimum level of effort to meet Level II (Evaluation Phase) survey requirements by the SHPO (i.e., gathering sufficient data for a determination of eligibility to the National Register of Historic Places). Future cultural resource work will depend on the evaluations (and SHPO concurrence) and predicted adverse impacts due to the Northern Rail Extension Project.

We request your approval of this site location model and associated survey strategy for the proposed Northern Rail Extension Project.

If you have any questions about the project please do not hesitate to contact Dave Navecky, SEA Project Manager, at 202-565-1593 or Alan Summerville, ICF Consulting Project Manager, at 703-934-3616.

Sincerely,



Victoria Rutson
Chief
Section of Environmental Analysis

Enclosure

EQ-403



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

August 18, 2006

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Ave., Suite 1310
Anchorage, AK 99501-3565

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. Bittner:

This letter serves to formally delineate the minor deviations from the originally submitted and agreed-upon survey strategy (Potter 2005), and to formalize the verbal agreements reached in the July 28, 2006 meeting and teleconference attended by representatives of your office, the Board's Section of Environmental Analysis (SEA), and SEA's third-party contractor team, including ICF International and Northern Land Use Research, Inc. (NLUR).

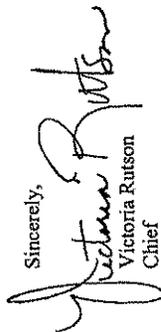
NLUR is now working from the "Revision 4" version of alignment alternatives and associated ancillary facilities information provided by the Alaska Railroad Corporation (ARRC) in July 2006, which supersedes the previously reported Revision 3a alignment alternatives series. With the addition of about 54 miles of alignment (by Revision 4 as compared to Revision 3a), NLUR has altered the survey strategy somewhat. Here are the specific changes in the survey strategy:

- All ancillary facilities are being analyzed with respect to the predictive model (Potter 2005), rather than being ground surveyed 100 percent. Most of these ancillary facilities are in areas with relatively low site potential, and are being surveyed through Type A surveys (helicopter-based surveys with localized areas of testing). Others are in higher potential locations and are being surveyed through Type B surveys (ground-based transects and localized areas of testing).
- A full Phase 2 (Evaluation Phase) level-of-effort was described in the survey strategy/predictive model document (Potter 2005). NLUR is testing discovered sites to obtain necessary information to complete a Determination of Eligibility (DOE) to the National Register of Historic Places. However, given the number of sites and the

fact that most of them were discovered in subsurface contexts, NLUR is analyzing the sites in a less intensive manner, as agreed in principle during the July 28, 2005 meeting. Enough information is being gathered to assess context, integrity, stratigraphic position, age (if possible), diagnostics, and overall technology. Site extent (identifying the borders of located sites) is not being addressed in our field effort, given the limited helicopter availability, limited field season, and depth/complexity of the buried sites.

All other aspects of the survey are following the Predictive Model and Survey Plan document (Potter 2005). If you have any questions or comments please do not hesitate to contact Dave Navecky, SEA Project Manager, at 202-565-1593 or Alan Summerville, ICF Consulting Project Manager, at 703-934-3616.

Sincerely,


Victoria Ruison
Chief

Section of Environmental Analysis

REFERENCES CITED:

Potter, Ben A. 2005. *Site Location Model and Survey Strategy for Cultural Resources in the Alaska Railroad Northern Rail Extension Project Area*. Prepared for ICF Consulting Services, LLC, by Northern Land Use Research, Inc., Fairbanks.



SUREFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

August 22, 2007

Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 West 7th Ave., Suite 1310
Anchorage, Alaska 99501-3565

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. Bittner:

Please find enclosed the 2006 cultural resources survey and evaluation for the above-
referenced project for your review pursuant to Section 106 of the National Historic Preservation
Act (16 U.S.C § 470f). This report was prepared for the Board's Section of Environmental
Analysis (SEA) by our third-party contracting team including ICF International and Northern
Land Use Research, Inc. (NLUR). The *Results of the 2006 Cultural Resource Survey of Proposed
Alaska Railroad Northern Rail Extension Routes and Ancillary Facilities, Alaska*, in 2 volumes,
includes all cultural resource survey results, site forms, and determination of eligibility
recommendations for the above undertaking for 2006. This report meets the stipulations under
State of Alaska Field Archaeology Permit 2006-08 (as well as BLM Fieldwork
Authorization/USDOI Cultural Resource Use Permit AA86535).

Please note that the enclosed report does not include the results from the 2007 cultural
resources investigation. The 2007 field work was recently completed and a separate report is
currently being prepared and will be provided to you as soon as it's available.

If you have any questions about the project please do not hesitate to contact Dave
Navecky, SEA Project Manager, at (202) 245-0294 or Alan Summerville, ICF Project Manager,
at (703) 934-3616. Specific technical questions may be directed to our cultural resources third-
party subcontractor (NLUR), Peter Bowers or Dr. Ben Potter at (907) 474-9684.

Sincerely,

Victoria Rutson
Chief
Section of Environmental Analysis

Enclosure
cc: Bob King, BLM

EL-2704

FRANK H. MURKOWSKI, GOVERNOR

550 W 7th Ave, SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8808

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

September 5, 2006

File No.: 3130-1R Surface Transportation Board

SUBJECT: Construct and operate rail line between Fickson Air Force Base (North Pole) and
Fort Greely (Delta Junction), Alaska

Victoria Rutson
Surface Transportation Board
Office of Economics, Environmental Analysis and Administration
Washington, DC 20423

Dear Ms. Rutson,

The State Historic Preservation Office (SHPO) received on August 18, 2006, your letter regarding
the referenced project. We have reviewed your revised survey and testing strategy in accordance
with Section 106 of the National Historic Preservation Act.

We agree with the following:

- > The type of survey employed in investigating the ancillary facilitates will be guided by the
predictive model: (A) helicopter based survey and localized testing in low potential areas; and
(B) ground based survey and localized testing in high potential areas.
- > All newly reported archaeological sites will continue to be evaluated for eligibility for the
National Register of Historic Places. Site boundaries however, do not need to be delineated
for this phase of the project. Once the final alternative has been selected, site boundaries
must be established of all eligible sites within the area of potential effect. Only then will the
SHPO be able to concur on an assessment of effect of this project.

Please contact Stefanie Ludwig at 269-8720 if you have any questions or if we can be of further
assistance.

Sincerely,

Judith E. Bittner
State Historic Preservation Officer

JEB:sl

Cc: Alan Summerville, ICF Consulting Service, LLC

SARAH PALIN, GOVERNOR

550 W. 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8908

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

September 24, 2007

File No.: 3130-1R Surface Transportation Board

SUBJECT: Northern Rail Extension, Eielson Air Force Base (North Pole) to Fort Greely
(Delta Junction), Alaska; State of Alaska Field Archaeology Permit 2006-08

Victoria Rutson
Chief, Section of Environmental Analysis
Surface Transportation Board
Office of Economics, Environmental Analysis and Administration
Washington, DC 20423

Dear Ms. Rutson,

The State Historic Preservation Office (SHPO) received your letter and the attached report titled *Results of the 2006 Cultural Resource Survey of Proposed Alaska Railroad Northern Rail Extension Routes and Ancillary Facilities, Alaska, Volumes I and II* by Northern Land Use Research, Inc. (December 2006) on August 23, 2006. We have reviewed the report and find that it meets the requirements of the State of Alaska Field Archaeology Permit.

We also reviewed the report in accordance with Section 106 of the National Historic Preservation Act and offer the following comments in regard to identifying historic properties in the area of potential effect:

1. We agree that the prehistoric sites are eligible for the National Register under criterion D.
2. We need more information on the cabins and other historic features before we can concur that they are not eligible for the National Register. They should be evaluated under their historic context (for example, 20th century trapping in interior Alaska). If a cabin has lost historic integrity due to recent modifications, then these changes should be described. Also, keep in mind that a collapsed cabin may still be eligible under criterion D.
3. Be sure to evaluate properties that may be indirectly affected by this project. Examples include the agricultural landscape near Delta Junction and Eielson Air Force Base as well as the Trans Alaska Pipeline System. Both features are in close proximity to the rail corridor and must be evaluated for eligibility prior to an assessment of effects.
4. The photographs in the report appear to be black and white photo copies and are difficult to decipher. Future report submissions should have higher quality figure reproductions.

Northern Rail Extension

9/24/2007

Page 1

Please consider these comments when requesting our concurrence on the Surface Transportation Board's findings of eligibility and effect (36 CFR 800.4 and 800.5). You may contact Stefanie Ludwig (269-8720) or Doug Gasek (269-8726) if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:sll

Northern Rail Extension

9/24/2007

Page 2

SURFACE TRANSPORTATION BOARD
Washington, DC 20423



CFR 1501.6, SEA previously invited the following Federal agencies to be cooperating agencies in the preparation of this EIS on the basis of their special expertise or jurisdiction by law:

- U.S. Department of Defense, Alaskan Command,
- U.S. Department of Defense, 354th Fighter Wing Command,
- U.S. Army Corps of Engineers – Alaska District,
- U.S. Department of Interior, Bureau of Land Management – Alaska State Office,
- U.S. Coast Guard, Seventeenth Coast Guard District,
- U.S. Department of Transportation, Federal Railroad Administration, and
- U.S. Department of Transportation, Federal Transit Administration – Region 10

September 17, 2007

Office of Economics, Environmental Analysis and Administration

Mr. Donald Perrin
Office of Project Management/Permitting
Southeastern Regional Office
Alaska Department of Natural Resources
Anchorage, Alaska 99501

Re: STB Finance Docket No. 34638, The Alaska Railroad Corporation – Petition for Exemption to Construct and Operate a Rail Line Between North Pole and Delta Junction, Alaska

Dear Mr. Perrin:

I am writing to invite the Alaska Department of Natural Resources (ADNR) to be a cooperating agency in the preparation of the environmental review described below:

On July 6, 2007, the Alaska Railroad Corporation (ARRC) filed a petition with the Surface Transportation Board (Board), pursuant to 49 U.S.C. 10502, requesting authority to construct and operate a new rail line between North Pole and Delta Junction, Alaska. The proposed project would involve the construction of approximately 80 miles of new rail line connecting the existing rail line near North Pole, Alaska to a point near Delta Junction, Alaska. Construction of the proposed rail line would provide all the major military installations in Alaska with rail access to the Port of Anchorage. ARRC also intends to provide passenger rail service between Fairbanks and Delta Junction, and as a common carrier, ARRC would be obligated to provide freight rail service upon request to any future shippers on the proposed line.

The construction and operation of this project has the potential to result in significant environmental impacts. Therefore, the Board's Section on Environmental Analysis (SEA) determined that the preparation of an Environmental Impact Statement (EIS) is appropriate. SEA issued a Notice of Intent to Prepare an Environmental Impact Statement and Draft Scope of Study on November 1, 2005, and held public scoping meetings in December 2005 as part of the EIS process.

Based on agency consultations conducted by SEA and its third-party contractor (ICF International) for this proposed project, SEA determined that the project could impact properties under the jurisdiction of or use by a number of Federal agencies. Therefore, consistent with 40

Based on recently enacted state legislation (i.e., Alaska Stat. § 42.40.460 [2005]), SEA would now like to extend an invitation to ADNR to be a cooperating agency in the preparation of this EIS based on your agency's jurisdiction by law.

If you have any questions, please feel free to contact Dave Navecky of my staff at 202-245-0294 (e-mail address: navecky@d@stb.dot.gov), or Alan Summerville, ICF Consulting project manager, at 703-934-3616 (e-mail address: ASummerville@icfconsulting.com). I would appreciate your response by October 19, 2007. We look forward to working with you in the near future.

Sincerely,

Victoria Rutson
Chief
Section of Environmental Analysis

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

SARAH PALM, GOVERNOR

550 W. 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3566
PHONE: (907) 263-8971
FAX: (907) 263-8908

July 16, 2008

File No.: 3130-IR, Surface Transportation Board

SUBJECT: Northern Rail Extension, Eielson Air Force Base (North Pole) to Fort Greely (Delta Junction), Alaska

Victoria Ratson
Chief, Section of Environmental Analysis
Surface Transportation Board
Office of Economics, Environmental Analysis and Administration
Washington, DC 20423

Dear Ms. Ratson,

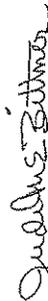
The State Historic Preservation Office (SHPO) received your letter and the attached report titled *Results of the 2007 Cultural Resource Survey of Proposed Alaska Railroad Northern Rail Extension Routes*, Alaska by Northern Land Use Research, Inc. (November 2007) on January 17, 2008. We have reviewed the report in accordance with Section 106 of the National Historic Preservation Act. The excavation results of XBD-298 (Chapter 5) are impressive and confirm the potential for very deeply buried and very early, multi-component archaeological sites in the project area.

We informally agree with the recommendations regarding eligibility for the National Register of Historic Places listed in Appendix B of the report. To formally concur however, we need to know whether the Surface Transportation Board, as the lead Federal agency, agrees with the findings in the report (as with the sites reported in 2006). As you are aware, 36 CFR 800.2(c)(3) allows Federal agencies to use the services of consultants to prepare information, analysis and recommendations, however the Federal official remains responsible for all findings of eligibility and effect.

We have also reviewed the report in accordance with Alaska Statutes 41.35.030 and find that it meets the requirements of the State of Alaska Field Archaeology Permit issued to the contractor.

We look forward to continued consultation with you regarding this undertaking. Please contact Stefanic Ludwig (209-8720) if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:sll

Cc: Peter Bowers, Northern Land Use Research, Inc.