APPENDIX R
WRITTEN COMMENTS ON THE DRAFT EIS

Comment Number: 1

Surface Transportation Board
Incoming Correspondence Record

#EI-18072

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	John Peters	Date Received:	03/19/2010
Group:		Date of Letter:	03/19/2010

Submitter's Comments

This Railroad Connection 2 will run right thru my house and my business and storage yard , I oppose this direction for your unneeded spur. Even if it didn't go thru my house and property I would still oppose all the noise pollution that it would bring. I am over a mile away from the main line right now and can hear it's noise.
There are alot of houses around here and the most logical route would be the Conn 3 . There is nobody out there. I am sure if you pick conn. 2 you will be meet by protest . My wife and myself have close to thirty years invested in these business's and house and will not just give it away without a fight. John + Teresa Peters Lakeway Woods block 1 lots 11,12,13
(907) 892-7108 (WE HATE NOISE)

Image Attachment(s)

STORE.jpg

STORE.jpg

Comment Number: 2

Surface Transportation Board
Incoming Correspondence Record

#EI-18073

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	John Peters	Date Received:	03/19/2010
Group:		Date of Letter:	03/19/2010

Submitter's Comments

This Railroad Connection 2 will run right thru my house and my business and storage yard , I oppose this direction for your unneeded spur. Even if it didn't go thru my house and property I would still oppose all the noise pollution that it would bring. I am over a mile away from the main line right now and can hear it's noise.
There are alot of houses around here and the most logical route would be the Conn 3 . There is nobody out there. I am sure if you pick conn. 2 you will be meet by protest . My wife and myself have close to thirty years invested in these business's and house and will not just give it away without a fight. John + Teresa Peters Lakeway Woods block 1 lots 11,12,13
(907) 892-7108 (WE HATE NOISE)
No On Connection 2 It will go through our storage yard Home and consignment business. This is for our retirement, PLEASE don't go this way. Teresa Peters

Image Attachment(s)

STORE.jpg

STORE.jpg

Comment Number: 3

Surface Transportation Board
Incoming Correspondence Record

#EI-18076

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Howard Hancock	Date Received:	03/28/2010
Group:		Date of Letter:	03/28/2010

Submitter's Comments

Draft EIS - Alaska Railroad - Port MacKenzie Rail Extension:
As a property owner in Willow, AK, the major impacts for me are from 1)train/rail noise, both from initial construction and ongoing future operations and 2)Parks and Recreational/Trails resources. Noise of course will increase for all build alternatives, but the swamps in the Willow route will carry and echo train sound more than other wooded routes to Houston or Big Lake would. Per the DEIS noise would have "severe" impacts.
More parks and recreational trails will be impacted in the Willow area than in other areas, per the DEIS. I am a frequent winter user of the parks and trails in the Willow area and do not want to see them bisected and disrupted by a rail line. My preference is to see the Mac East, Conn 3, Houston, Houston South or Houston North alternatives. This route would have the least impact on recreational park and trail users and would not impact or create crossings over the Parks highway or Big Lake Road or Willow Creek.

Comment Number: 4

REPRESENTATIVE PAUL SEATON

SESSION ADDRESS
State Capitol Building
Juneau, Alaska 99801-1182
(907) 465-2689
Fax: (907) 465-3472
1-800-665-2689

INTERIM ADDRESS
345 W. Sterling Highway
Homer, Alaska 99603
(907) 235-2921
Fax: (907) 235-4008
1-800-665-2689

ALASKA STATE LEGISLATURE
House District 35

March 23, 2010

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

David,

Please accept this request to add Homer Public Library to the service list for Docket No. 35095. I have included the necessary contact information below.

Helen Hill, Library Director

Homer Public Library
500 Hazel Avenue
Homer, AK 99603

Thank you for your assistance.

Paul Seaton

Sincerely,

Representative Paul Seaton

http://www.RepPaulSeaton.com
Email: Rep_Paul_Seaton@legis.state.ak.us

Comment Number: 5

Surface Transportation Board
Incoming Correspondence Record

#EI-18089

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Ben Demboski	Date Received:	04/05/2010
Group:		Date of Letter:	04/05/2010

Submitter's Comments

STB Finance Docket 35095 Alaska Railroad Point Mckenzie rail extension. Please do not build this Extenxion to Willow Alaska. it will cross parklands and ruin Hunting and fishing in the area. My family depends on the Moose and Salmon I get every year from this area. Houston Alaska is a better choice. Respectfully, Ben Demboski

Comment Number: 6

"Greg Strong"
<gstrong@mtaonline.net>
04/07/2010 06:52 PM
Please respond to
"Greg Strong"
<gstrong@mtaonline.net>

To <naveckyd@stb.dot.gov>
cc
bcc
Subject Beluga Whales: An Endangered Species

Sir,
The Houston South route to Port Mackenzie will bisect 20 miles of the Little Susitna Watershed. This railroad corridor will disrupt or destroy critical salmon spawning habitat. It is this habitat that produces food for the whales.
Recommending this route flies in the face of NOAA and the Marine Mammal Protection Act studies and subsequent recommendations.
The Willow Route avoids these hazards and therefore avoids challenges from the environmental community. Lawsuits from the environmental community will cause costly delays, which could ultimately make this project "cost prohibitive."
Respectfully submitted,
Greg Strong

Comment Number: 7

Surface Transportation Board
Incoming Correspondence Record

#EI-18091

Correspondence Information			
Docket #:	**FD 35095 0**		
Name of Sender:	Phillip Saunders	Date Received:	04/07/2010
Group:		Date of Letter:	04/07/2010

Submitter's Comments
Just writing to say I'm in full support of the Alaska rail line extension to Port MacKenzie. Thanks for the opportunity to comment.

Comment Number: 8

"Royce Rock"
<rrock@citci.org>
04/09/2010 12:58 PM

To <naveckyd@stb.dot.gov>
cc <psullivan@matsugov.us>, <wheelers@akrr.com>
bcc
Subject Port Mackenzie Rail Extension Project

Mr. Navecky,

I am sorry that I had to send this to your business e-mail however the information that has been put out for public comment via filing electronically is short on information and long on links. A better system needs to be in place for public testimony if in fact that is what you really want.

I would like to comment on the different routes that are being proposed for the Alaska Point Mackenzie Rail extension Project. As a property owner in the proposed area (Crooked Lake) I could very easy just right none of the above however I do see the justification for adding the spur. My preference would be the Mac East connecting to the line referred as the (Willow) rout that is the farthest to the west. The reasoning behind my feeling is 1) It would be the farthest away from the most dwelling. 2) As a snowmobiler and four wheeler it would be very unsafe to put a railroad closer in to the population. 3) The Willow spur being out the furthest to the west would also open more land for development. 4) The Willow rout would also be to the west of the Nancy Lake Recreation area which is another very busy (in Alaska terms) recreation area. I truly hope that all the frustration of trying to send these comments to someone that is going to decide our fate as property owners is listened to and you understand what your decision means to us.

Royce R. Rock
CITC
San Jeronimo Drive
Anchorage, Alaska 99508
rrock@citci.com
907-793-3322
Cell 240-8420

Comment Number: 9

Surface Transportation Board
Incoming Correspondence Record

#EI-18093

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Dan Kruse	Date Received:	04/09/2010
Group:	Big Lake Trails, Inc. (501c3 non-profit trail organization for Big Lake Alaska)	Date of Letter:	04/09/2010

Submitter's Comments

During the April 7, 2010 Public Hearing held in Big Lake, Alaska regarding the MacKenzie railroad project on the STB draft EIS, the STB was asked by the audience if they had seen or read the 2009 Big Lake Comprehensive Plan. Enclosed is the PDF document of the Big Lake Final Plan that the community developed for the long term (20+ year) vision and recommended developments for the Big Lake community. This plan was developed and adopted by Big Lake community stakeholders over many years, extensively reviewed in Public Hearings, and endorsed in 2009 by the Mat-Su Assembly under ordinance as the guiding community planning document. The document can be found online at http://ww1.matsugov.us/index.php?option=com_docman&task=doc_download&gid=1906&Itemid=238 and it is also attached electronically for the public record and your consideration. This official planning document for Big Lake is a detailed all-encompassing community planning tool, including existing and future trail strategies that are entirely consistent with the presentation and recommendations made by Big Lake Trails, Inc. (Dan Kruse, Vice President), which is also enclosed in PDF format for your reference and record. Please review the comprehensive planning document as you consider this very important decision as it accurately reflects the opinions and sentiments of the majority in Big Lake and what you heard and was submitted at the Big Lake Public Hearing held on April 7, 2010 with the STB regarding the draft rail project EIS. Restating our April 7, 2010 position, Big Lake Trails, Inc. supports the Willow rail route, with the Big Lake route as a poor second choice, and completely opposes any and all of the Houston rail routes given the severe impacts it will have to the existing MSB approved historic and regionally significant recreational trail system and to a large segment of greater Big Lake area private property owners.

Sincerely,

Dan Kruse
Vice President
Big Lake Trails, Inc.
trails@biglaketrails.org
www.biglaketrails.org

Image Attachment(s)

ATTALMOG.pdf ATTZUVPY.pdf


ATTALMOG.pdf


ATTZUVPY.pdf

Comment Number: 10

Surface Transportation Board
Incoming Correspondence Record

#EI-18094

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Lynndeen Knapp	Date Received:	04/11/2010
Group:		Date of Letter:	04/11/2010

Submitter's Comments

The option that should be taken out of the picture is the Big Lake route. There is most environmental and cultural damage with this path. There are the wetlands, moose habitat, cranes nesting in this area to be considered. There is the other things such as spliting up the neighborhood, safety with the school and finally the sound carries so far in the quiet of the winter. Please concider the Willow option with more distance from Red shirt Lake. Thank you Lynndeen

Comment Number: 11

Surface Transportation Board
Incoming Correspondence Record

#EI-18095

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	James Faiks	Date Received:	04/13/2010
Group:		Date of Letter:	04/13/2010

Submitter's Comments

I understand that the primary objective of this rail extension is to facilitate the movement of freight between interior Alaska and a port. Since the Anchorage port is further away and has very little land for staging industrial projects, extending the RR to the port at MacKenzie does make sense.

I believe the Willow route should be selected for the following reasons:
1. It is the most direct route from the interior to a port.
2. It has the least impact on dedicated recreational trails.
3. It crosses or impacts less private property than the other 2 routes.
4. It will not cross any major roads, and only a few minor ones.
5. Although this route requires the construction of more rail miles, the reduced cost of road and trail crossings and the fewer land condemnations and conflicts with private land owners could make it the most cost effective route.
6. If a road were to be constructed later adjacent to the Rail, it would greatly reduce commercial traffic though downtown Big Lake.
7. As the port becomes more successful, increased Rail traffic to it along the Willow route will be the least disruptive for the majority of the population.
8. The Willow route follows a glacier moraine and might avoid more wet lands than the other two routes.

I encourage you to select the Willow route.

Comment Number: 12

Surface Transportation Board
Incoming Correspondence Record

#EI-18096

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Douglas Debenham	Date Received:	04/12/2010
Group:		Date of Letter:	04/12/2010

Submitter's Comments

Re: Houston south route for the railroad.

Please do not use this route for the railway. There are many cabins and recreational areas on this route that would be adversely affected. I have spent the last almost forty years of my life enjoying the areas around crooked lake in particular. Please give careful consideration to the Willow route as this would affect fewer people. Thanks for your thoughtful consideration of this request.
Sincerely,
Douglas R. Debenham, M.D.

Comment Number: 13

Surface Transportation Board
Incoming Correspondence Record

#EI-18097

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	WILLIAM MAILER	Date Received:	04/14/2010
Group:		Date of Letter:	04/14/2010

Submitter's Comments

Please see attached document.

Image Attachment(s)

Draft EIS Comments ARR Extension.doc

Draft EIS Comments ARR Extension.doc

Comment Number: 13 (continued)

WILLIAM and KATHLEEN MAILER
P.O. Box 947
12374 Hagion Shores Drive
Willow, Alaska 99688
wmailer@mtaonline.net

April 14, 2010

Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

To Whom It May Concern: Reference: Finance Docket No. 35095

The purpose of this correspondence is to comment on the Draft Environmental Impact Statement regarding the Port Mackenzie Rail Extension Project. We would like to compliment the authors of this document for the apparent thoroughness and thoughtfulness.

Willow, Alaska is directly and negatively impacted by the proposed Willow route of the rail extension. This area is very rural and dependent on the near pristine quality of our environment. The Willow Creek State Recreation Area and the Nancy Lake State Recreation Area would both be adversely affected by the rail extension. Each is immediately adjacent to the community of Willow.

Residents of Willow use the area proposed for the rail extension for recreation, hunting and fishing. The proposed loss of wildlife habitat and degradation of the many highly used trails in the area would have a profound negative impact on the area. I just can't imagine how snow machines and dog sled teams will safely negotiate crossing tracks.

Additionally, the estimated cost for the Willow route is higher by tens of millions of dollars that other routes. This factor alone should preclude this route from being selected.

These concerns are well supported in the Draft EIS.

There is one special request that we would like you to consider. That is to require the Alaska Railroad to salvage all trees in the right-of-way of whatever route is selected. There is a great need for firewood by residents in the area. Trees in excess of three inches in diameter should be salvaged and transported to staging areas where individuals could collect them.

Thank you for the opportunity to comment.

Sincerely,

William and Kathleen Mailer

Comment Number: 14

Surface Transportation Board
Incoming Correspondence Record

#EI-18098

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Lev Shvarts	Date Received:	04/19/2010
Group:		Date of Letter:	04/19/2010

Submitter's Comments

As a landowner in Willow, I'm very concerned about both the environmental impact of the proposed branch through Willow, and the loss of trail access and recreational opportunities the branch through Willow will undoubtedly bring. This would be a devastating loss to a community that caters to recreational interests, and the loss of trail access would be disastrous.

I'm deeply against running the proposed rail line through Willow. Houston wants it, give it to them. Don't run it through Willow.

Comment Number: 15

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: JOHN G. R. WOLFE
Address: BOX 101572 ~~ANCHORAGE AK 99510-1572~~
ANCHORAGE
City, State, Zip : AK - 99510 - 1572
Phone: 907 - 272 - 7698

What comments do you have about the Draft Environmental Impact Statement?

The DEIS, in my opinion, does not give adequate attention to two areas: (A) Human Residents and (B) Noise Pollution — :

(A) The entire area proposed for RR routes runs through, or alongside, the major personal-recreation area for most of Southcentral Alaska — recreational lakefront properties and/or recreational homesites. The solution would be to have one route, placed as far west as possible — more nearly along the east bank of the Susitna River.

(cont'd on next page)

STB Finance Docket No. 35095

Comment Number: 15 (continued)

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: JOHN G. R. WOLFE
Address: Box 101572
ANCHORAGE
City, State, Zip : AK- 99510-1572
Phone: 907-272-7698

What comments do you have about the Draft Environmental Impact Statement?

(cont'd from page 1) (B) As far as noise pollution, trains are obnoxiously noisy & loud — as I recall your DEIS cites noise levels between 80–90 db. All of the rail route alternatives are through a near-wilderness quiet. Railroad noise in such an area carries for miles cross-country, and I don't know of any feasible way to make a railroad "quieter". The solution, to my thinking, is to take your proposed railroad route as far west as safely possible, out along the east bank of the Susitna River.

Comment Number: 16

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Ray Debenham
Address: 2960 C. ST. Suite 202
Anchorage, AK 99503
City, State, Zip :
Phone: 907-440-1117

What comments do you have about the Draft Environmental Impact Statement?

See Attached

STB Finance Docket No. 35095

Comment Number: 16 (continued)

Ray Debenham

Alaska

Phone: (907)562-9330
Fax: (907)562-9331
Cell Phone: (907)440-1117
E-Mail airondog@ak.net

David Navecky
STB Finance Docket # 35095
Surface Transportation Board
395 E. Street SW
Washington, DC 205423

Dear Mr. Navecky

I just got a copy of the report from the latest Point MacKenzie Railroad recommendations. I can not believe that the engineers gave the Houston South route the highest rating.

I was on the board that studied the series of routes that the Borough recommended in 1996. We went through all the recommendations and had many meetings with the public and came to the conclusion that the route very close to what you call the Willow route would be best for the people who live in the area.

I have gone through the report done by Tryck and Hayes in 2007. It errs in a number of areas.

1- The Big Lake Area is a very busy year-around recreational area. I, personally, have ridden my snow mobiles and 4-wheelers over this area since the 1960's. There are over 1000 snow machine/4-wheeler trails that the railroad would have to cross on the Houston Route. The Willow Route might have 20 to 30 trails.

2- The South Houston spur would require a bridge across the Little Susitna River in order meet the requirements for a siding, that the Alaska Railroad requires at each spur, to be put in Houston. This information is according to the Alaska Railroad. Tryck and Hayes did not mention it in their 2007 report.

3. Safety is a very important issue. With over 1000 recreational trail crossings by the railroad on the Houston Route, it will be very dangerous for the recreational riders year around. The Willow route will not impact recreational riders nearly as extensively..

4- On the Willow route, the soils are predominately moraine, while the Houston routes are predominately bog and out wash. The Borough was specifically informed by Alaska State Fish

Alaska • Utah • Hawaii
2960 C Street, Suite 202 Anchorage, Alaska 99503

Comment Number: 16 (continued)

and Game that they would have to build bridges over any wet lands that were identified as "bog" or "out wash". This mandate alone would make the Houston route the most expensive to build.

5- The Houston Route traverses a known active earthquake fault. Peter Haeussler of the U.S. Geological Survey shows that the area can produce a earthquake in the magnitude of 6 to 7. This puts the railroad in a zone of "goo" where sediments liquefied and flowed during ancient earthquakes. I experienced first hand the 1964 Alaska earthquake. I saw what happened to roads and building in a earthquake of that magnitude. The buildings in downtown Anchorage slid out to sea. The road system on "goo" at the end of Turnagain Arm, disappeared. We could not even find any evidence that there was a road there.

6- The Environmental effects on the Houston Route would far exceed the Willow Route. It is eminently closer to many small lakes and recreational areas. Any spill, at all, would most likely directly affect or quickly leach into one of the many lakes. Additionally, the recreational cabins and permanent homes in this area rely on wells for their water. We cannot afford any contamination or interference with subterranean water streams.

The Willow Route is along a glacial moraine that is above the water table and has less of a chance of impact on the lakes, rivers or wells. With the soil in a moraine area, contaminants would tend to be contained in the ground soils and consequently easier to clean up. Also of note, there are almost no full-time residences along the Willow Route and very few cabins.

7- Air quality will be affected no matter which route is chosen. However, the Willow Route will impact the least number of people. The Willow Route would also provide that the train noise would occur in an area with the least amount of people impacted rather than the very quiet and much more densely populated residential and recreational area of the Houston route.

8- Cultural and Historic Resources of the report were just wrong from my point of view. It states that "because the Willow route was longer, there would be more effect on historical sites." Just logic tells me that the natives lived around the areas that had water. These were their highways and trails. Looking at the map, it is obvious that the Houston route would cross or be closer to more lakes and rivers where the majority of historical sites would be located.

9- The Socioeconomic portion of the report I read with interest. DPOR states that the Willow route would "reduce recreation experience because the line is ¼ mile from one campsite." This does not make sense. The fact is that the line through Houston would go right next to or within a ¼ mile of over 1000 recreational cabins and trails and campsites not just one which was not included in the Tryck and Hayes report either. I do not believe he was adequately informed on the environmental impact of the routes.

When DPOR report exclusively stated that the Willow would displace wildlife on "his" parks and recreation areas. Does the DPOR not care about the wildlife on the Borough, Native, State of Alaska (Mental Health and University) areas? These areas are currently being used for wildlife and recreation. Does this not have just as much effect, if not more, than the "official reserves" do? It is a lot more land.

Alaska • Utah • Hawaii
2960 C Street, Suite 202 Anchorage, Alaska 99503

Comment Number: 16 (continued)

I would like to close by saying that the Houston route for the railroad will have a greater impact on humans. The railroad will directly affect private property within several miles of the route with noise and vibration, restricting recreational use of trails, additional safety issues and visual impact; not to mention the potential for spills. Property value will be reduced, quality of life will decrease, and the quiet enjoyment of our land will be effected.

So why put the railroad were it effects the most people? Very few people would be effected by the Willow route. I urge you to choose the Willow Route.

Regards,

Ray G. Debenham

Alaska • Utah • Hawaii
2960 C Street, Suite 202 Anchorage, Alaska 99503

Comment Number: 17

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: SANDRA D. BEREAN
Address: P.O. BOX 520526 - MAIL
2637 S. RORY CIRCLE, ROCKY LAKE ADD. PHYSICAL
City, State, Zip : BIG LAKE, ALASKA 99652
Phone: 907-892-6266

What comments do you have about the Draft Environmental Impact Statement?

AFTER LISTENSING TO THE COMMENTS AT THE BIG LAKE, AK. MEETING, THIS IS WHAT I HEARD. MANY PEOPLE ALONG THE HOUSTON & BIG LAKE ROUTES WILL HAVE TO BE RE-LOCATED. THERE ARE MANY TRAILS WHICH WILL BE IMPACTED. OUR WATERSHED DRAINAGE IN HOUSTON WILL BE GREATLY DISTURBED BY RAILROADS & HWY's. IN 1996 MANY HOMES WERE DESTROYED BY A NATURAL FIRE WHICH WENT THRU HOUSTON & BIG LAKE. IT WOULD BE SAD

STB Finance Docket No. 35095

Comment Number: 17
(continued)

TO ASK THOSE PEOPLE TO RE-LOCATE, OR HAVE A RAILRD. OR HIGHWAY GO RIGHT BY THEIR HOME. IT WASN'T EVEN MENTIONED ABOUT THE TRAFFIC DISTURBANCE WHICH WOULD OCCUR FOR TWO SCHOOLS, SHOPPING MALL, LIBRARY, FOUR CHURCHES, LOCAL POST OFFICE, & VARIOUS OTHER BUSINESS OWNERS, IF YOU CHOOSE THE BIG LAKE ROUTE. LOGISTICLY, IT SEEMS VERY ~~UN~~REASONABLE TO GO THE WILLOW ROUTE, W/ LESS LAND BUYOUTS, LESS LAND USE IMPACT. YOU'D OPEN UP NEW LAND FOR ALASKANS TO GRAVITATE TO. DOESN'T THAT MAKE MORE SENSE THEN UPSETTING & UPROOTING HOUSTON & BIG LAKE RESIDENT'S?

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

20423$0001

Comment Number: 18

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Dana L. Olson (lots 3+46L2 Skyline Estates sub.
Address: HC-35 box 5438
Wasilla, Alaska 99654 (we have no post office)
City, State, Zip: I live in Knik, Alaska
Phone: Message 354-1289

What comments do you have about the Draft Environmental Impact Statement?

"The wave of information threatens to obsequre strategy, to drown in details and numbers, calculation and analysis, reaction and tactics. To have strong tactics we must have strong strategy on one side and accurate calculation on the other. Both require seing into the future. Gary Kasparov, How life imitates chess.

"Opposite pairs working in harmony: this has become a theme of our quest to perfect decision-making. Calculation and Evaluation, patience and opportunism, intuition and analysis, style and objectivity - - - strategy and tactics, planning and reaction. Success comes from balancing these forces and harnessing their inherent power." Gary Kasparov, How life imitates chess. Taken from The fire, Katherine Neville →

An application can do none of these things and address supporting infrastructure. In four hours of testimony, you refused to address what I

Dana L Olson April 8, 2010 EA10.

Dana L Olson

Comment Number: 18
(continued)

Does the decision-maker required to have a competent court to address archives? of historical relevance.
An application is voidable.
I deny competence, on a number of factors ① preference rights are not consistent (federal relocation assistance.
there's no law school, and governmental rationalization is voided.
species are not addressed in permits, thus applications hardly trigger an event. (no skill in federal legal drafting) since 1991.
Who owns the water (affected) until competency arises. Nepa is dead. no coastal consistency.
U.S District court, operates in a state where attorneys are protected, in fraudulent activities (disclosure) violating the federal Rules of professional conduct.
The land grant colleges refuse to allow for public to decide what degrees are offered. a land grant college, can not operate in public trust, to control (1st amendment)
the telecomunications is not under FCC, SAFS a federal appeal court (last week). This issue is not under any of federal agencies reviewing. I object to theories, as administrative law does not operate this way. federal administrative code).
How long is federal relocation assistance good for, when basic notice requires the ability to give - administrative notice.
Susitna basin Exploratory License published in Alaska given Section 7 collection Louise library in Anchorage (largest in Alaska.

Place Stamp Here

Dana L Olson
8 April 2010
Dana L Olson
shallow gas.

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 19

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Lynda Zarcone
Address: PO Box 202 (Physical - 36209 W. Parks Hwy.)
City, State, Zip : Willow AK 99688
Phone: 495-7416

What comments do you have about the Draft Environmental Impact Statement?

Don't understand how you can protect all the trails. Willow has spent years developing, mapping, protecting, grooming all these trail systems. You can't ignore all the community involvement w/ these trails. One or two crossings will not be enough.

Also concerned with habitat protection - wetlands, salmon streams, bird nesting sites, etc.

STB Finance Docket No. 35095

Comment Number: 20

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Bryan & Lori Ladd
Address: PO Box 520535
Big Lake, Alt 99652
City, State, Zip :
Phone: (907) 357-2080 907 355-8409

What comments do you have about the Draft Environmental Impact Statement?

Our Concern on this the impact on the wildlife & Birds were in the narrow corridor the proposed line shows for the Big Lake route between Goose bay Wildlife refuge & the susitna Flats Refuge. Our proptery is at the end of Echo Lake Rd & we are rebuilding after the 1995 Fire. I am really not wanting to have the noise of the trains twice a day for the rest of our lives, Big Lake Area is a major breeding

STB Finance Docket No. 35095

Comment Number: 20
(continued)

grounds for Trumpeter swan's, Sandhill Cranes, Eagles both Bald & Golden. Numerous Owls & Hawks. the impact of a railway thru my back yard is just not acceptable. Also Fish Creek is a major or only Red Salmon Stream that is still active & making a come back after the 1995 miller's Reach Big Lake Fire, I see no mention of any EPA Notices off this side of Knik sound, for the Salmon spawning streams.
We are not thinking any of these routes are acceptable. And the fact we had no notice is not acceptable.

Place
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David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

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Comment Number: 21

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: MARC Lind
Address: POBox 670182
City, State, Zip : Chugiak AK 99567
Phone: 907-688-4515

What comments do you have about the Draft Environmental Impact Statement?

I don't think the Willow Route is the way to go. You have a moose wintering grounds at Rolly Creek & Willow Cr. You have lots of Summer Wonter trails. At this time the Rail is a 1 1/4 mile from me the new Rail will be less then a 1/4 mile from me And Neabors. And the Rail port is back with Fast moving water & ice. And you got four Rivers to cross And Alot of wet lands

STB Finance Docket No. 35095

Comment Number: 21
(continued)

Place
Stamp
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David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 22

April 7, 2010

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Re: Port MacKenzie Rail Line Extension through Big Lake, Alaska

Dear Mr. Navecky,

Trails are vital part of the environmental, social, historical and economic fabric of Big Lake. Both secured and non-secured trails provide a critically important stimulus to our local economy, provide valued recreational opportunities for our residents and provide required transportation links to cabins, settlements and other communities. The rail extension through Big Lake is of grave concern to trail users because it threatens to permanently divide, damage or destroy the tapestry of this community that so many of us have so carefully woven.

The attached map shows the impact that the proposed rail alignments will have on the Big Lake trail system. See the orange arrows for intersecting rail and trail points. The proposed rail extensions will impact Big Lake recreational trails, as follows:

- Big Lake Route - Currently intersects and conflicts with trails in two locations. Not shown is a conflict with a multi-million dollar proposed Wasilla to Big Lake Trail which is currently under study to provide both motorized and non-motorized trails linking these two communities. This proposed trail, when developed, will be of economic importance to the whole Matanuska-Susitna Borough
- Willow Route - Intersects and conflicts with trails in three locations.
- Houston Routes (North and South) - Intersects and conflicts with trails in seven locations.

Because trails are so important to Big Lake, many residents and non-residents joined together as guardians of current trails and as developers of future trails to form Big Lake Trails. Big Lake Trails, Inc. is a non-profit 501c3 organization representing over 100 trail user members. Many more citizens rely on this organization to protect area trails. The members and Board of Big Lake Trails have unanimously approved the following position as it applies to the rail extension through Big Lake:

- The Willow route provides the best alternative for the community because it provides the least conflict with private property owners and will minimally impact legally protected trails. It is our

Comment Number: 22
(continued)

understanding that these legally protected trails will be provided with adequate crossings that will allow use by the general public as well as grooming access for large groomers that will enable us to maintain these trails. Choosing this route may have the unintended benefit of opening up land to the west of Big Lake allowing for growth of the Borough tax base and allowing the future westward expansion of our road system. This would be viewed as a positive benefit of the rail extension versus a negative.

- If the Willow route were to be removed from consideration, the Big Lake route to the south would be a second but poor choice. Clearly, the Big Lake route has the least impact to recognized trails. Unfortunately, it does have a high impact on private property owners and property ownership.

- The two Houston routes are totally unacceptable to our trail users because of the very high impact on trails and on private property owners. It would be better for the STB to take the "no action" alternative rather than to consider either the North or South Houston route. These routes would completely destroy winter recreational trail opportunities, and would create a high noise and safety issue for property owners.

Our position is further supported by many residents of the community, the current Big Lake Comprehensive Plan, the Big Lake Community Council and the Big Lake Chamber of Commerce. It is our hope that the STB recognizes the right of this community to manage change in a way that fits our life style and our vision for the future. Any funding concerns or politics that have come into play regarding choosing either of the Houston routes need to take a back seat to the destruction of our quality of life.

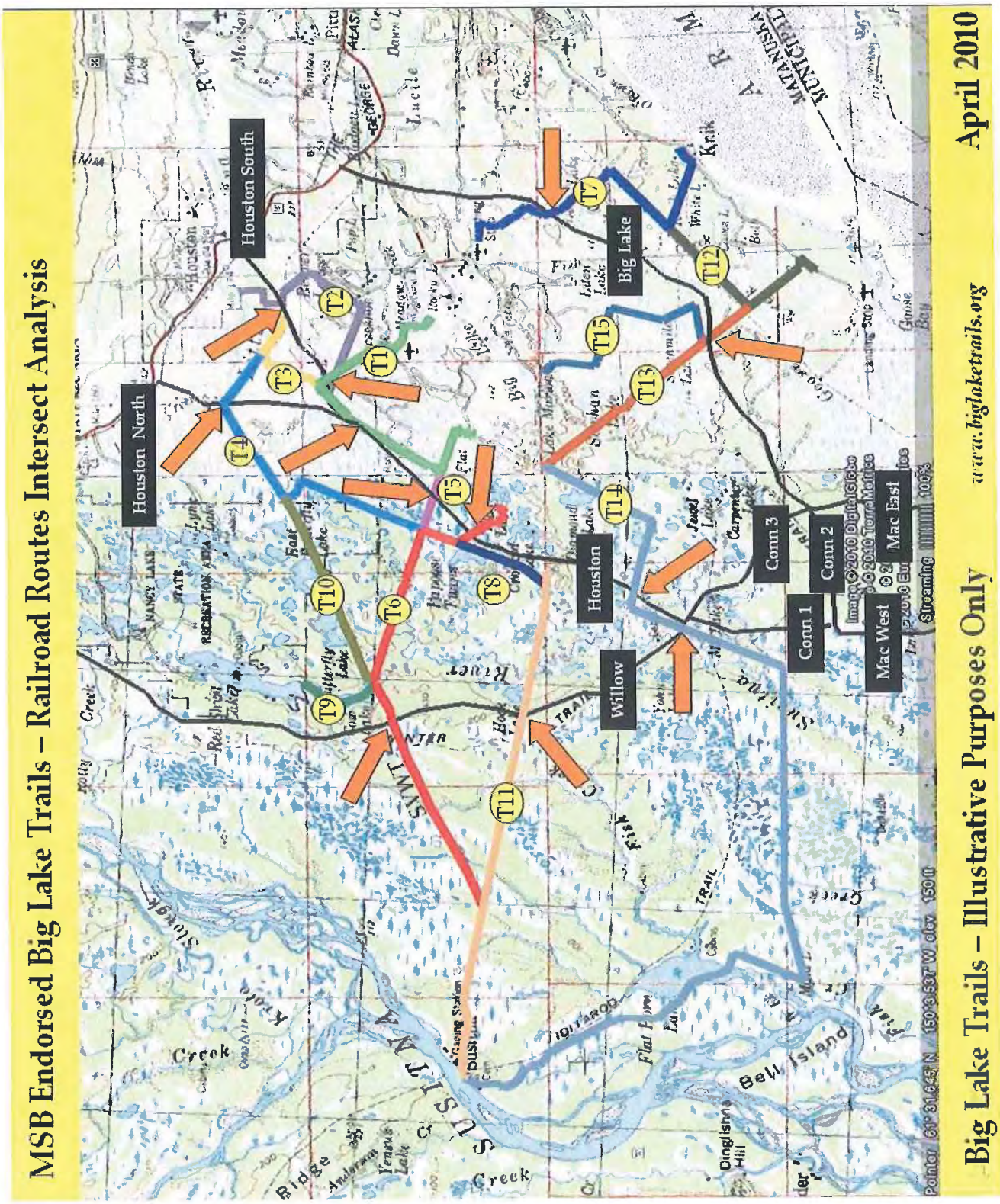
The additional rail options for consideration in the draft EIS located to the south of the routes discussed above, namely Conn 1, Conn 2, Conn 3, Mac East and Mac West, do not present conflicts with our existing trail system and therefore, we have no stated position or preference as to these routes.

Big Lake Trails stands ready and willing to work with engineers who will insure adequate design work on the future trail crossings needed for this project. Please feel free to contact me with any questions.

Best Regards,

Dan Mayfield
President, Big Lake Trails, Inc.
PO Box 520705
Big Lake, AK 99652
Cell: 907-223-2447

Comment Number: 22
(continued)



Comment Number: 23

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Duane Nixon
Address: 3750 N. Sierra Street
City, State, Zip : Wasilla, AK. 99654
Phone: 841-7763

What comments do you have about the Draft Environmental Impact Statement?

My concern would be the invasion of the railroad into the Willow & Big Swamp area. This area needs to remain a playground for snowmachiners, dog teams, cross-country Skiing, etc...
If this route is unfortunatly Chosen I would at least like to see track Crossings at all current trails west of Willow.
Please don't limit recreational access to Alaska only to expand the profits of ARR.

STB Finance Docket No. 35095

Comment Number: 24

16 October, 2007

Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Port MacKenzie Rail Spur

Big Lake Community Council
P.O. Box 520931
Big Lake, Alaska 99652

Dear Board Members,

The Big Lake Community Council carefully considered the proposed rail spur routes being studied to connect Port MacKenzie to the existing railroad. We would like to share with you our concerns and suggestions for the route we support.

The west route is the one favored by our council as it has the least impact on our area. This route is mostly on bourough, state or federal land and has minimal private property along the right of way. It would cross a number of our recreational trails but with crossings incorporated into the design of the route we feel it is a workable route. The route is also mostly on a natural moraine and would minimize wetland crossing. From the bourough's perspective, this route would open up a large area of inacessible land for sale and development, increasing the tax base. Finally, noise pollution caused by rail traffic would be generally far away from existing dwellings.

The central route is the least desirable route of the options presented. This route would inpact a tremendous amount of private property and proximity to existing dwellings would create a noise pollution nightmare. Much of the route is wetlands and is in the Big Lake watershed area. Construction of a raised railbed crossing to the west and north of Big Lake would create essentially an earthern dam across a large part of this watershed. This would create havoc with

Comment Number: 24
(continued)

the existing drainage pattern and would have unknown consequences. This route would cross virtually every trail in and around Big Lake, resulting in many crossings to accomodate the trail users. We are also concerned about the negative impact on the borough from devaluing of property as a result of the rail line, potentially reducing tax revenues.

The eastern route is also not recommended due to the route crossing many private lands. Noise pollution would be another issue due to proximity to dwellings. This route would also require a road crossing at Hollywood and at Big Lake Road. It also crosses many wetlands and the Iditarod Trail. The main rail line is across the Parks north of the hiway, requiring an over or under pass to reach the main line.

The council is not opposed to the development of the port and supports a rail spur to service it. We are concerned about the character of the lake and its surrounding areas. This is one of the most prized recreational areas in this state and supports robust summer and winter recreational activities. It is also becoming increasingly popular with year round residents.

The recreational trail system in this area is extensive with thousands of miles in and around Big Lake. It is often called the gateway to the western Susitna Valley area and is extensively used by snowmobilers and dog mushers in the winter. I have enclosed a map of the major Big Lake trails with an approximation of the routes of the rail spur indicated. You will note that the central route crosses and recrosses many of the main trails in this area and many more that are not indicated. The western route has the least impact on the trail system.

Please consider our input during your decision making process. Thank you for your attention to this matter.

Sincerely,

William O'Hara, President
Big Lake Community Council

Comment Number: 25

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: STUART C RADER
Address: 3313 PEACE COURT
City, State, Zip : ANCHORAGE, AK 99508
Phone: (907) 333-1212

What comments do you have about the Draft Environmental Impact Statement?

My FAMILY OWNS REAL PROPERTY SOUTH OF THE BELUGA WATERS ABUTTING THE SUSITNA FLATS GAME REFUGE. WHEN THE STATE DEVELOPED THE PT MAC AGRICULTURAL PROJECT IT INTERRUPTED ACCESS TO OUR HOMESTEAD VALONG THE SEISMIC LINE NEAREST OUR PROPERTY. THE STATE OR BOROUGH EVENTUALLY EXTENDED THE PORT ACCESS ROAD ALLOWING USE OF THE INTERIOR RIGHT OF WAY FROM/TO THE TEELAND SUB-STATION. WHEN THE BOROUGH

STB Finance Docket No. 35095

Comment Number: 25
(continued)

paved the Port Access Road it occupied the parking lot we used and made our existing trail/winter Road unusable. Chugach Electric Association put in a new trail/winter trail allowing access. How do intend to allow access from the "winter trail" head to the south and west? Will there be an access/crossing near the port? How will connect with existing trails. Pt MAC is a cow/calf moose rearing area. Historically, moose from as far away as Mt Susitna travel to from Pt MAC in the spring and fall. How are you planning to allow moose travel? Assign/Explaining how many have been killed thus winter is not an acceptable means of minimization

Place
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David Navecky
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Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 26

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Richard C. Sumner
Address: P.O. Box 872992
City, State, Zip : Wasilla, Alaska 99687
Phone: 907-357-8398

What comments do you have about the Draft Environmental Impact Statement?

Good job. Now lets be done with the studies and get started on one of the two most viable routes; Houston North ~~or~~ Houston South. Long after we all gone our great grandchildren

STB Finance Docket No. 35095

Comment Number: 26
(continued)

will look at this project and
others in the near future and Thank
our generation for the foresight to
get these projects done.

Place Stamp Here

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 27

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Daniel N. Russell
Address: P.O. Box 577
City, State, Zip : Willow, AK 99688
Phone: 907-373-8176

What comments do you have about the Draft Environmental Impact Statement?

If a commuter train is incorporated into the project to bring people to the new Ferry boat, m/v Susitna, then ~~xxxx~~ much greater support from the local community will arise.

I support the "Mac-East-to-Houston North" route, as it seems to provide the most direct connection with the existing rail line, and because the commuting time to the Ferry boat terminal will be minimized.

STB Finance Docket No. 35095 Sincerely, Daniel N. Russell 4/13/2010

Comment Number: 28

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Lincoln L Shaw Sr

Address: 1870 Diamond Dr.

City, State, Zip : Anchorage, ak 99507

Phone: 907 561-5916

What comments do you have about the Draft Environmental Impact Statement?

Want information

STB Finance Docket No. 35095

Comment Number: 28
(continued)

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Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 29

SURFACE TRANSPORTATION BOARD

Section of Environmental Analysis

Port MacKenzie Rail Extension Project

Environmental Impact Statement

COMMENT FORM

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Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Victor Stanculescu

Address: Box 891

City, State, Zip : Willow AK 99688

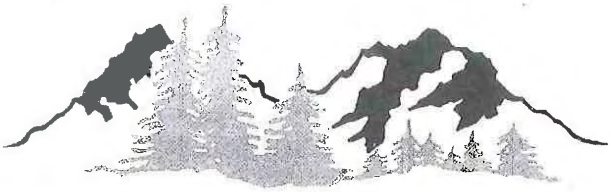
Phone: 495-0812

What comments do you have about the Draft Environmental Impact Statement?

I opose the willow selection. The route crosses several vital sacmon streams and major recreation Al trails that would have a negative impact on the Willow area.

STB Finance Docket No. 35095

Comment Number: 30



GREGORY E. STRONG

Mr. David Navecky
STB Finance Docket No: 35095
Surface Transportation Board
395 E st. SW
Washington D.C.
20423-0001

February 28, 2008

RE: The Castle Mountain Earth Quake Fault vs The Houston South Rail Proposal

Dear Mr. Navecky

At an earlier Assembly Meeting our local elected officials were provided with an "Evaluation Matrix" for the proposed routes for the Port MacKenzie Rail Extension Project (Exhibit A). The Matrix reviewed ten (10) categories for eight (8) proposed routes. A map reflecting each of the proposed routes is included (Exhibit B).

What is of concern, and the reason for this letter is that the status of the sub surface geologic estate is NOT part of the Evaluation Matrix. The proposed Houston South route runs perfectly parallel for its entire length of travel with the Castle Mountain Earthquake Fault (Exhibit C). Let me be clear, we're not talking about the proposed rail line merely crossing the fault, but rather the proposed route runs directly on top of or directly along side of the fault from the Susitna River to the Parks Highway. Dr. Peter Haeussler of the USGS states that this fault could fail at anytime with an expected 7.2 magnitude earthquake(1). This fault line has failed every 650-700 years for the last 2500 years. The last time this fault line failed was 650 years ago.

The construction of a portion of a quarter of a billion dollar rail project paid for with taxpayer dollars on top of a known, well documented and well studied earthquake fault is something prudent officials, such as your self, should avoid.

Even minor quakes could create frequent rail alignment failures resulting in numerous, expensive derailments. Let me urge you to remove from consideration the Houston South route as it is certainly not a safe, viable, commercial transportation route.

P.O. BOX 875169, WASILLA, ALASKA 99687
PHONE: (907) 745-9096 • FAX: (907) 746-6440

Comment Number: 30
(continued)

In January of this year the Alaska Rail Road's "Preliminary Environmental and Alternatives Report" finally acknowledged the existence of this fault. Unfortunately the Alaska Rail Road gave it "short shrift" sighting the 1964 earth quake in Alaska did little damage to the railroad. Of course they failed to mention that the 1964 quake occurred twenty miles out at sea, and five miles below the earth's surface, which is far and away an entirely different scenario than building a rail line virtually on top an active seismic fault. Because of its potential significance the USGS has studied the Castle Mountain Fault for nearly 35 years. The Castle Mountain Fault, according to Drs. Labay and Haeussler of the USGS, "is one of several major east-northeast striking faults in southern Alaska, and is the only fault with historic seismicity and Holocene surface faulting"(2). For your convenience and review I have enclosed an abstract of that report.

I am not expert on the matter, but I suspect that a bonding company may be reluctant to commit funding to a project designed (in part) to be constructed virtually on top of an "active seismic fault". It is my belief that individuals at the following agencies may express serious chagrin at such a proposal: Alaska Earthquake Information Center, Alaska Division of Geological and Geophysical Surveys, Applied Technology Council, Alaska Division of Homeland Security and Emergency Management, Earthquake Engineering Research Institute, Federal Emergency Management Agency, U.S. Geological Survey. I know as I have spoken with many of them.

The Houston South route was removed from consideration in the 2003 study of rail line extensions. Just 5 years ago the Alaska Rail Road endorsed the westerly route, which is now referred to Connection 3 or the "Willow Route". Because of the length of track and subsequent cost this "Willow Route" appears to be less favorable today than the shorter Houston South route. The problem remains of the potential of a 7.2 magnitude earthquake under the entire length of the Houston South Route. I urge you to again make the Connection 3 route, or Willow Route the preferred route of the Surface Transportation Board.

Comment Number: 30
(continued)

Respectfully Submitted,

Gregory E. Strong Ph.D.

Attachments (4)

(1) Haeussler, Peter J., Seismic Disturbances of Upper Quaternary Deposits along the Castle Mountain Fault near Houston, Alaska: US Geological Survey Open File Report 1998

(2) Keith Labay and Peter Haeussler, GIS Coverages of the Castle Mountain Fault, South Central Alaska.US Geological Survey, Open File Report 01-504

Cc: Members of the" Friends of the Lakes"

Bcc: (12)

Comment Number: 30 (continued)

PORT MACKENZIE RAIL EXTENSION

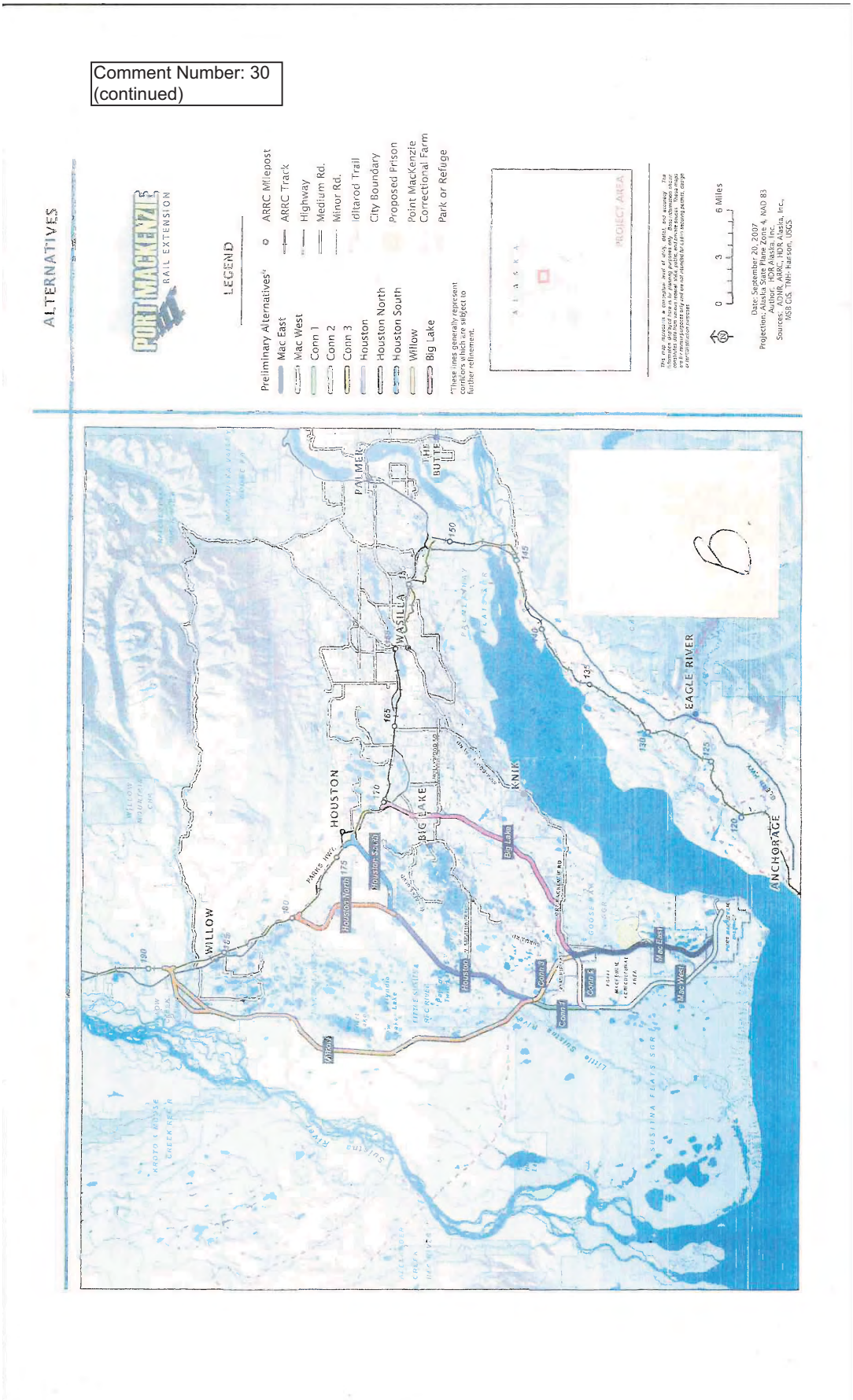
Evaluation Matrix

PROPOSED ROUTES	CRITERION										Preliminary Cost Estimate (millions) [5]
	1	2	3	4	5	6	7	8	9	10	
	Poor or highly compressible soils (cubic yards)	New road crossings (#)	Land availability[3] (acres/mile)	Developed parcels (#)	Designated land use[4] (acres)	Train Energy (horsepower-hours)	Wetlands (acres)	Mapped anadromous fish streams (#)	High potential for archeological sites[c] (acres)	Fragmentation of designated refuges and recreation areas (yes/no)	
Mac West - Willow	0	+	0	0	-	0	0	0	-	-	$320
Mac West - Houston North	-	+	0	+	-	+	-	0	+	-	$250
Mac West - Houston South	0	+	0	+	-	0	-	0	+	0	$220
Mac West - Big Lake	+	-	-	-	-	-	0	-	-	0	$290
Mac East - Willow	0	0	0	+	+	0	+	+	-	-	$330
Mac East - Houston North	-	0	0	+	+	+	0	0	+	-	$260
Mac East - Houston South	0	0	+	+	+	0	+	+	+	+	$230
Mac East - Big Lake	+	-	0	-	+	-	+	-	-	+	$285

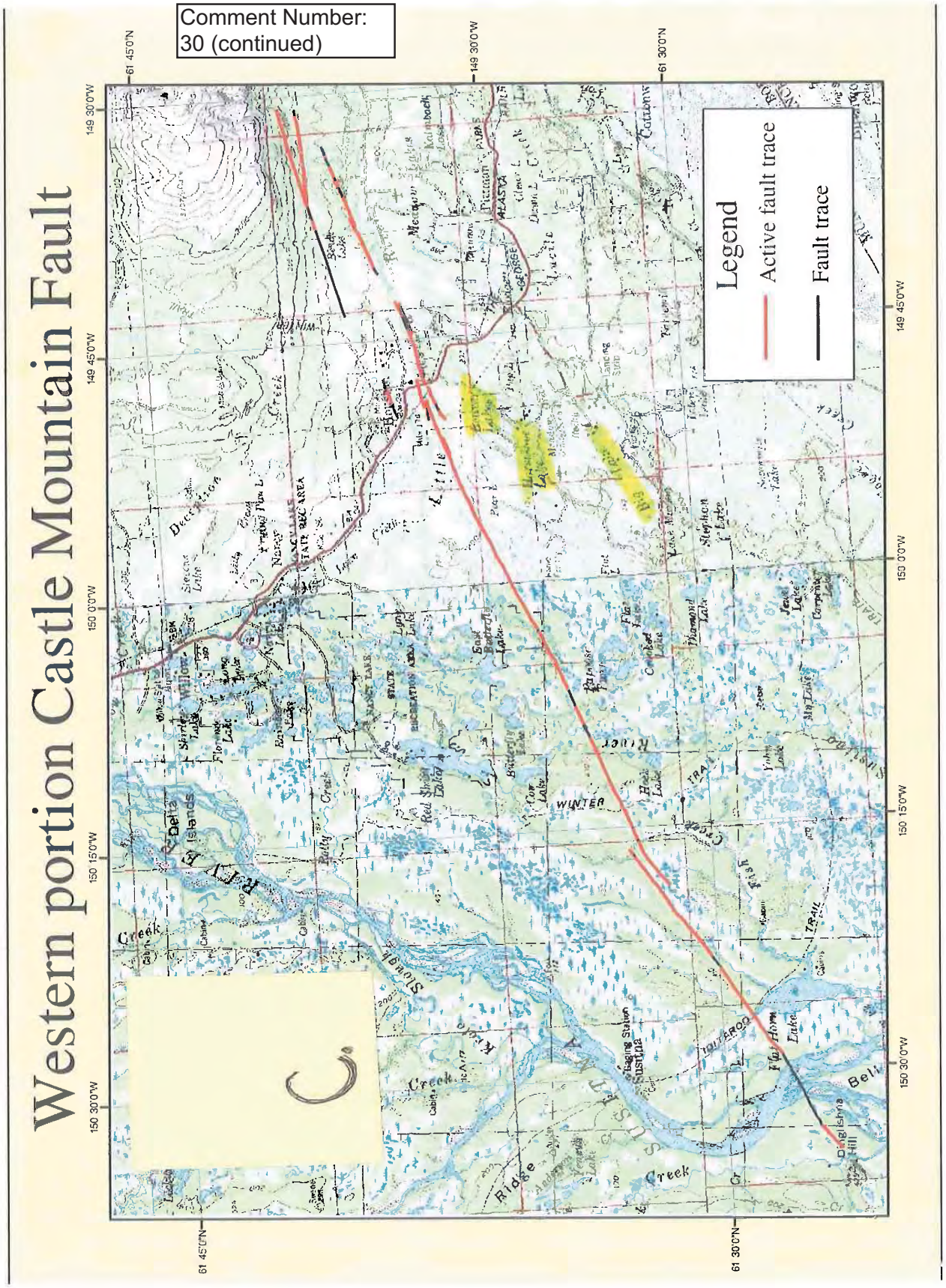
1. (+) Positive; (0) Neutral; (-) Negative
2. Criteria not weighted / Routes are unranked
3. Large parcels of undeveloped land owned by State of Alaska MSB, University of Alaska, Mental Health Trust, and Alaska Native corporations
4. Lands that are designated for parks, refuges, residential, or agricultural uses
5. Costs do not include approximately $10 million for loop track construction within the port (all alterna

4

Comment Number: 30
(continued)



Comment Number:
30 (continued)



U.S. Geological Survey
Open-File Report 01-504

GIS Coverages of the Castle Mountain Fault, South Central Alaska

By Keith Labay and Peter J. Haeussler

Comment Number:
30 (continued)

View toward the west-southwest along the Castle Mountain fault, west of Houston, Alaska, with Mt. Susitna in the distance. The upthrown, north, side of the fault is on the right.

ABSTRACT

The Castle Mountain fault is one of several major east-northeast-striking faults in southern Alaska, and it is the only fault with had historic seismicity and Holocene surface faulting. This report is a digital compilation of three maps along the Castle Mountain fault in south central Alaska. This compilation consists only of GIS coverages of the location of the fault, line attributes indicating the certainty of the fault location, and information about scarp height, where measured. The files are presented in ARC/INFO export file format and include metadata.

Go to files to download

Comment Number: 30 (continued)

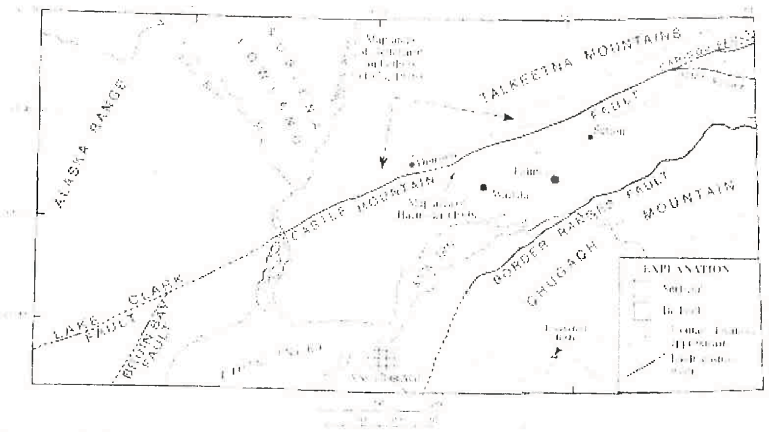


Figure 1. Location of Castle Mountain fault in south central Alaska, and previous USGS maps along the fault.

Introduction

The Castle Mountain fault is one of several major east-northeast-striking faults in southern Alaska, and it is the only fault with historic seismicity and Holocene surface faulting (Lahr and others, 1986; Detterman and others, 1974). The Castle Mountain fault is approximately 200 km long, and is one of the longest structures in the Cook Inlet basin. Martin and Katz (1912) first noted the fault, but it was delineated on a regional scale by Detterman and others (1974, 1976). They mapped and divided it into two physiographic segments: the western Susitna Lowland and eastern Talkeetna Mountains segments (Fig. 1). Haeussler (1994, 1998) mapped and examined the 30-km-long region between the two Detterman and others (1974, 1976) maps.

This report is a compilation of the three USGS maps that cover the location of the Castle Mountain fault in some detail (Detterman and others, 1974, 1976; Haeussler, 1998), with the purpose of providing land managers with an authoritative source for the location of the fault in the Talkeetna Mountains and Susitna Lowland. There are other maps that also cover parts of the Castle Mountain fault (Reger and others, 1995a,b,c; Clardy, 1974; Fuchs, 1980), but these do not alter the location of the fault. Thus far, there are no land use or building regulations associated with proximity to the Castle Mountain fault.

The surface trace of the Castle Mountain fault is not the only earthquake hazard associated with the fault. The two historic earthquakes on the Castle Mountain fault were located on the part of the fault where there is no surface expression (Lahr and others, 1984), and thus even the part of the fault with no scarp should probably be considered active. In addition, Haeussler and others (2000) showed there is a 3-4 km wide fault-cored anticline on the north side of the fault near Houston. The faults in the core of the anticline do not crop out at the surface, but certainly also represent a seismic hazard. Saltus and others (2001) use aeromagnetic data to show that this anticline continues for the length of the Castle Mountain fault in the Susitna Lowland.

Methodology

The Haeussler (1998) map was the easiest to include in this compilation. It was published at 1:25,000-scale, and was already available digitally and included metadata (http://geopubs.wr.usgs.gov/open-file/of98-480/).

Comment Number: 30 (continued)

The Detterman and others (1974) map along the Castle Mountain fault was the most difficult to capture. This report consisted of three 1:24,000-scale aerial photograph strips along the fault, with point annotations on the photographs. The photographs had not been registered or rectified. In order to georeference the data it was digitized in straight table coordinates, and then registration points were established between the photographs and georeferenced images of USGS topographic maps. Due to the lack of prominent features on the photographs the registration points could not be located with as much precision as desired. To compensate for this the faults and points were rubber sheeted to the images of the topographic maps after registration. However, the locations of these faults should still be considered less accurate then those from the other sources.

The Detterman and others (1976) map along the eastern end of the fault is at1:63,360-scale, and was digitized from a paper copy of the map. This map was drawn over a topographic base, so it could be registered without accuracy problems. All faults on the map were digitized. These included not only the Castle Mountain fault, but the Caribou fault as well.

There was some overlap in the three geologic maps, and we used the Haeussler (1998) map in the overlap areas. There was a slight difference in the location of the main trace of the fault at the western end of the Haeussler (1998) map and the Detterman and others (1974) map. We used the lines from the Haeussler (1998) map and adjusted the position of one fault on the Detterman and others (1974) map to match up within a half-mile distance west of the Haeussler (1998) map. At the eastern end of the Haeussler (1998) map one small fault was completely removed from the Detterman and others (1976) map while the two main fault traces were trimmed and the northern portion was matched to a fault on the Haeussler (1998) map.

Discussion of Line Types

The Haeussler (1998) map identified the following line types: fault; fault, approximate location; fault, probable location; fault, possible location; fault, concealed; and lineations. The first four fault types are listed in descending order of certainty.

The faults for the Detterman and others (1974) and (1976) maps were attributed based on the coding scheme previously established by the Haeussler (1998) map. This allowed us to be consistent when the three maps were merged. However, based on the descriptions from the Detterman and others (1974) and (1976) maps we decided to code the faults using only three levels of uncertainty instead of four. Thus any fault whose description was equivalent to a "probable location" was given the same code as faults with an "approximate location." The faults that were lumped together have been given an additional attribute parameter that can be used to distinguish them. There is also a parameter to distinguish portions of the fault where visual evidence of movement can be seen. Refer to the metadata for more specific information about the line attributes.

Seismic reflection data demonstrate there is a 3-km wide fault-cored anticline (fold) on the north-side of the trace of the Castle Mountain fault (Haeussler and others, 2000). The faults that core this fold are probably active and also constitute a seismic source. An aeromagnetic high is associated with uplifted basement in the core of the fold (Saltus and others, 2001), which can be used to deliniate the structure on a regional scale. The high parallels the Castle Mountain fault for a length of 65 km from the Susitna River to the Houston area, and it has a separate line code in the coverage.

Discussion of Point Coverages

Comment Number: 30 (continued)

The Detterman and others (1974) map had annotations on the aerial photographs indicating scarp height and various observations along the fault trace. The high and low elevations for these locations are reproduced in the point coverage cmfault_pnt. Refer to the metadata for more specific information about the point attributes.

References Cited

Clardy, Bruce I., 1974, Origin of the lower and Middle Tertiary Wishbone and Tsadaka Formations, Matanuska Valley, Alaska: unpublished M.S. thesis, University of Alaska, Fairbanks, 74 pp.

Detterman, R. L., Plafker, G., Hudson, T., Tysdal, R. G., and Pavoni, N., 1974, Surface geology and Holocene breaks along the Susitna segment of the Castle Mountain fault, Alaska: U.S. Geological Survey Miscellaneous Field Studies Map MF-618, 1 sheet.

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Fuchs, W. A., 1980, Tertiary tectonic history of the Castle Mountain-Caribou fault system in the Talkeetna Mountains, Alaska: unpublished Ph.D dissertation, University of Utah.

Haeussler, Peter J., 1994, Possible active fault traces on or near the Castle Mountain fault between Houston and the Hatcher Pass Road: in Till, A., and Moore, T., eds., Geologic studies in Alaska by the U.S. Geological Survey, 1993: U.S. Geological Survey Bulletin 2107, p. 49-58.

Haeussler, Peter J., 1998, Surficial geologic map along the Castle Mountain fault between Hous-ton and Hatcher Pass Road, Alaska: U.S. Geological Survey Open File Report OFR 98-480, scale 1:25,000, 1 sheet. http://geopubs.wr.usgs.gov/open-file/of98-480/

Haeussler, Peter H., Bruhn, Ronald L., and Pratt, Thomas L., 2000, Potential seismic hazards and tectonics of upper Cook Inlet Basin, Alaska, based on analysis of Pliocene and younger deformation: Geological Society of America Bulletin, v. 112, p. 1414-1429.

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Reger, R.D., Combellick, R.A., and Pinney, D.S., 1995a, Geologic and derivative materials maps of the Anchorage C-7 NE Quadrangle, Alaska: Alaska Division of Geological and Geophysical Surveys Report of Investigations 94-24, scale 1:25,000.

Reger, R.D., Combellick, R.A., and Pinney, D.S, 1995b, Geologic and derivative materials maps of the Anchorage C-7 NW Quadrangle, Alaska: Alaska Division of Geological and Geophysical Surveys Report of Investigations 94-25, 2 map sheets, scale 1:25,000.

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Files to Download

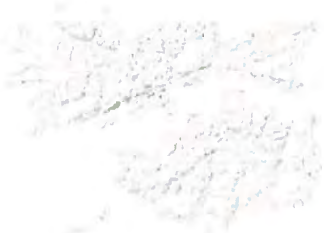
Comment Number: 30 (continued)

Files for Viewing and Plotting

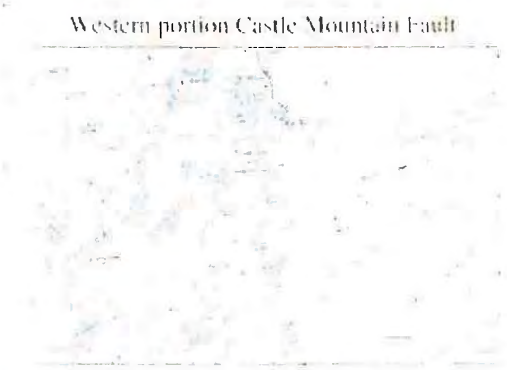
JPG version

Map of entire Castle Mountain fault (jpeg file)

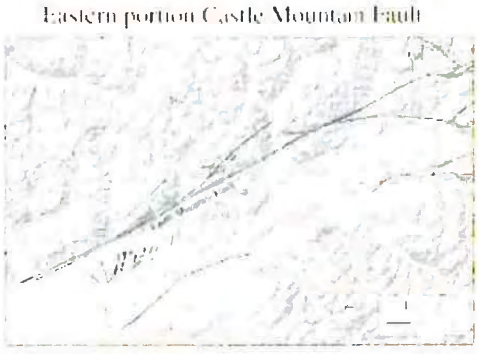
PDF version



Map of entire Castle Mountain fault (PDF file - note large file size 19.7 MB)



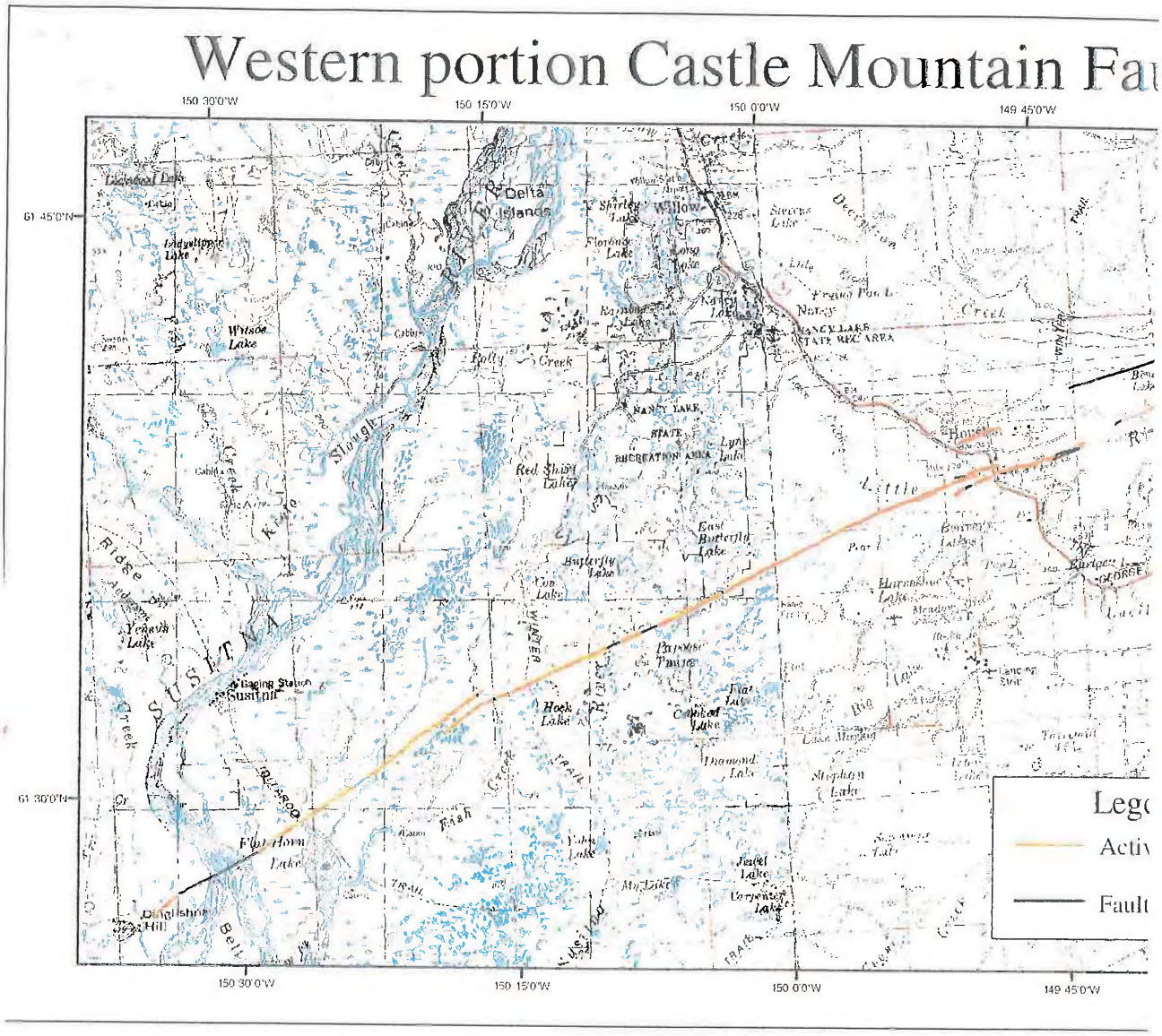
Map of western part of Castle Mountain fault (jpeg file)



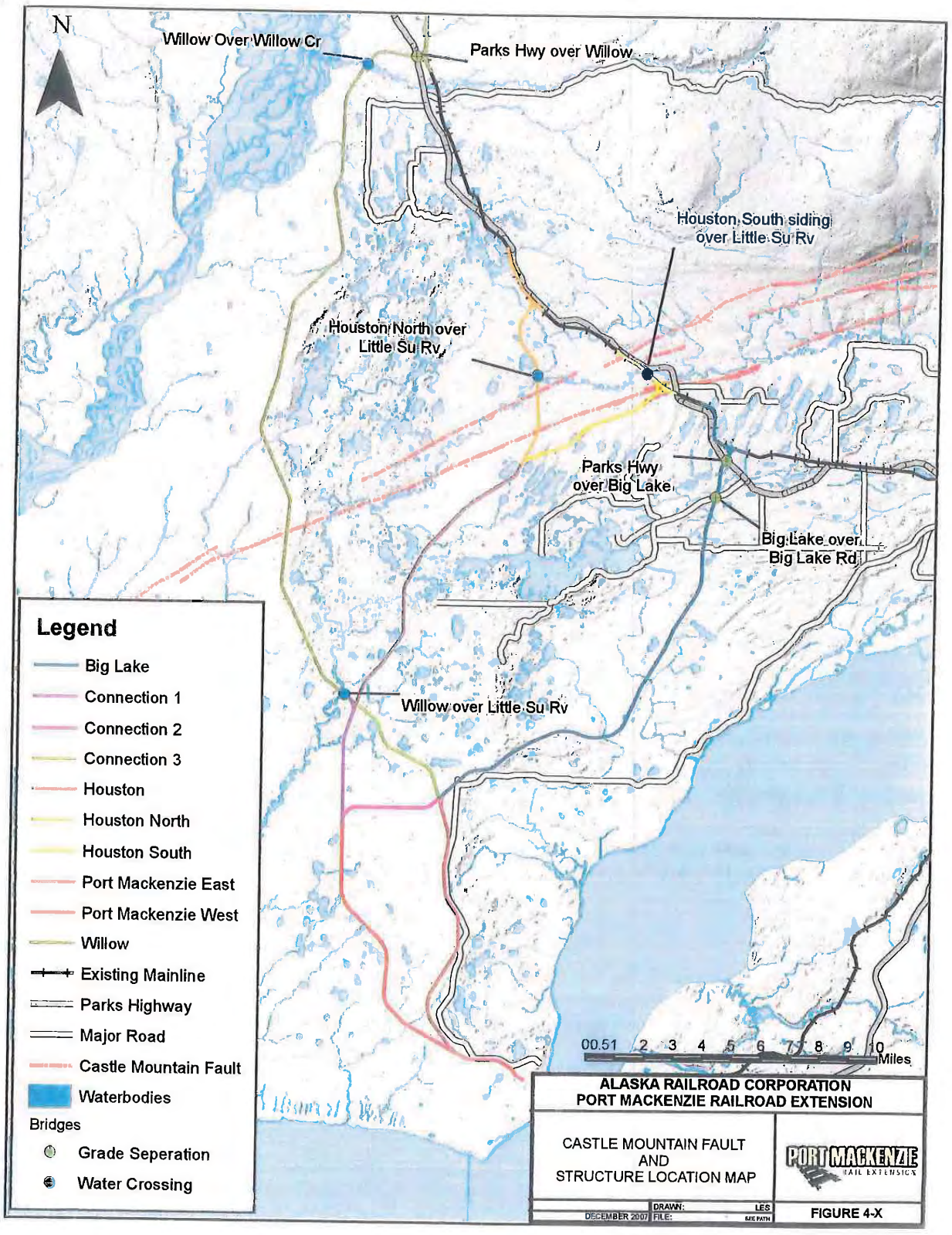
Map of eastern part of Castle Mountain fault (jpeg file)

Data

Comment Number: 30 (continued)



Comment Number: 30 (continued)



Comment Number: 31

MEMORANDUM

To: Friends of the Lakes

Re: Port MacKenzie Route Rail Extension: STB Docket No. 35095

Fr: Greg Strong

Da: April 2, 2008

Please use the attached comparison when discussing this issue with your family, friends and neighbors.

Cc: All State and Federal Regulatory Agencies

Comment Number: 31
(continued)

Alaska Railroad -- Point MacKenzie Expansion

Support the Willow Route

Willow Route is the *best* choice for Alaska Railroad Expansion to Point MacKenzie.

Why? It:

- Is best route for development of Enstar's natural gas "bullet" line into Southcentral Alaska.[1]
- Is the safest as it eliminates dangerous traffic on the Parks Highway.[2]
- Opens land for development creating more tax base for the Mat-Su Borough and economic development opportunities for its citizens.[3]
- Provides the least impact to private Big Lake area landowners.[4]
- Is supported by business, community groups.[5]
- Is the preferred route of local government.[6]
- Has the least impact on the environment.[7]
- Was selected as the best route by the Alaska Railroad itself in 2003.[8]

1. The Willow corridor will expedite the construction of the "bullet line" for Enstar Natural Gas to all parts of Southcentral Alaska from the North.
2. The Willow Route redirects large truck/heavy equipment traffic off the Parks Highway. Currently Mile 53 to Church Road is considered the "most dangerous" in the State of Alaska. (report citation) The Willow Route is NOT located along any earthquake faults. It has the most favorable soils, the least potential for harming wetlands, lakes, rivers and streams, less disruption of ecosystems, least impact on the human quality of life.
3. The creation of Willow Corridor will open thousands of acres of Mat-Su Borough and State of Alaska lands for development thereby establishing a new tax base for the next 100 years.
4. Less than 1% of the 572,000 square miles in Alaska is owned by private individuals. Why reclaim what little is in private hands?
5. The chambers of commerce of Willow, Big Lake approve of this route as well as the Big Lake Community Council.
6. Mat-Su Borough Long Range Transportation Plan, Mat-Su Borough Comprehensive Plan, Mat-Su Borough Assembly (June 2003) recommend this route.
7. Engineering study (Shannon & Wilson, Inc. of October, 26, 2007) proves the Willow Route is the most energy efficient. It saves 16.5% more "train energy."
8. Alaska Railroad by Mr. Bruce Carr.

Comment Number: 31
(continued)

Alaska Railroad -- Point MacKenzie Expansion

Houston South Route A BAD Idea

The Houston South Route:

- Is located on top of a known active earthquake fault. [9]
- Crosses a sensitive watershed negatively impacting all species of salmon and trout. [10]
- Creates a manmade damn potentially flooding critical bird habitat. [11]
- Negatively impacts Big Lake area landowners. [12]
- Is not supported by government, business or the people! [13]

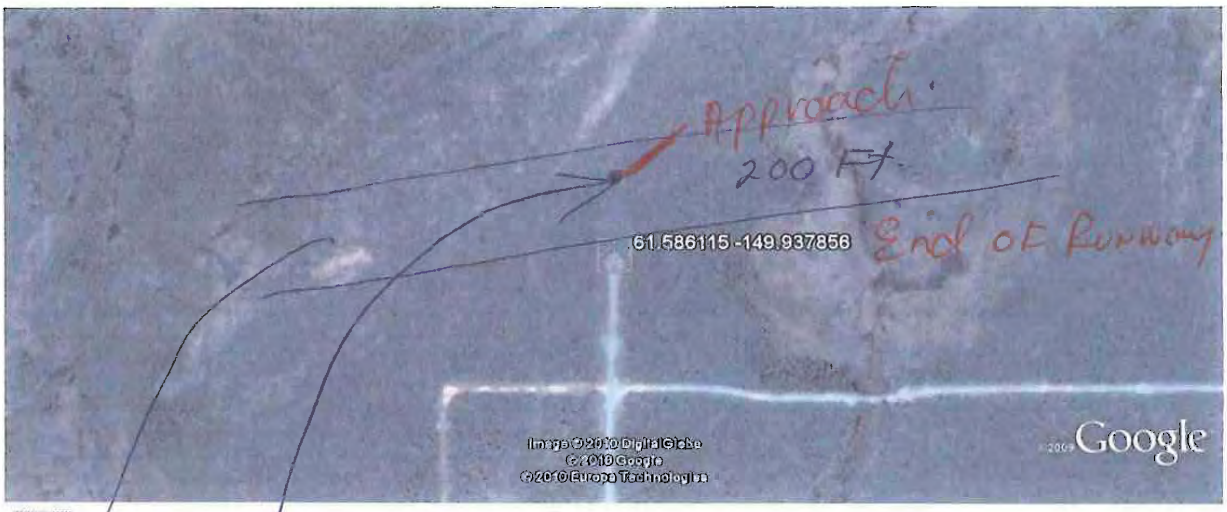
9. The Houston South corridor includes the possibility of a gas line and road. All would be constructed on an active seismic fault. According to the USGS, the Castle Mountain Fault is expected to fail within the next 50 years with a 7.2 magnitude earthquake.
10. The rail bed supporting the track will bisect a 10,000-year-old watershed feeding the Little Susitna River that drains West, Moleshoe, Colt, Pear, Blanket, Horseshoe, Hourglass Lakes and the Little Susitna River.
11. The rail bed will create an earthen dam. It is expected to flood causing bank erosion and silt build up in salmon and trout spawning beds. Additionally, flooding would cause disruption of waterfowl nests which includes loons, geese, mallards, griebs and Trumpter Swans.
12. Flooding could cause failure of septic systems and contamination of wells to the area's 400 homes. Also, the rail bed will disrupt the natural flow of surface and subsurface water between Colt, Moleshoe Lakes and West, Horseshoe and Hourglass Lakes.
13. In the 2003 Tryck, Nyman Hayes study, the Houston South route was rejected because "it appeared to have the largest level of impact on wetlands and did not receive public support."

The Houston South Route is the WORST route, and should NOT be chosen.

Support the Willow Route

Comment Number: 32

Page 1



61.586115 -149.937856 – End of Runway

Blow up View of Runway & RR Right of Way

End of Tree Clearing for Approach to Airport
61.586741 -149.937803

200 Ft. Rail Road clearing Easement

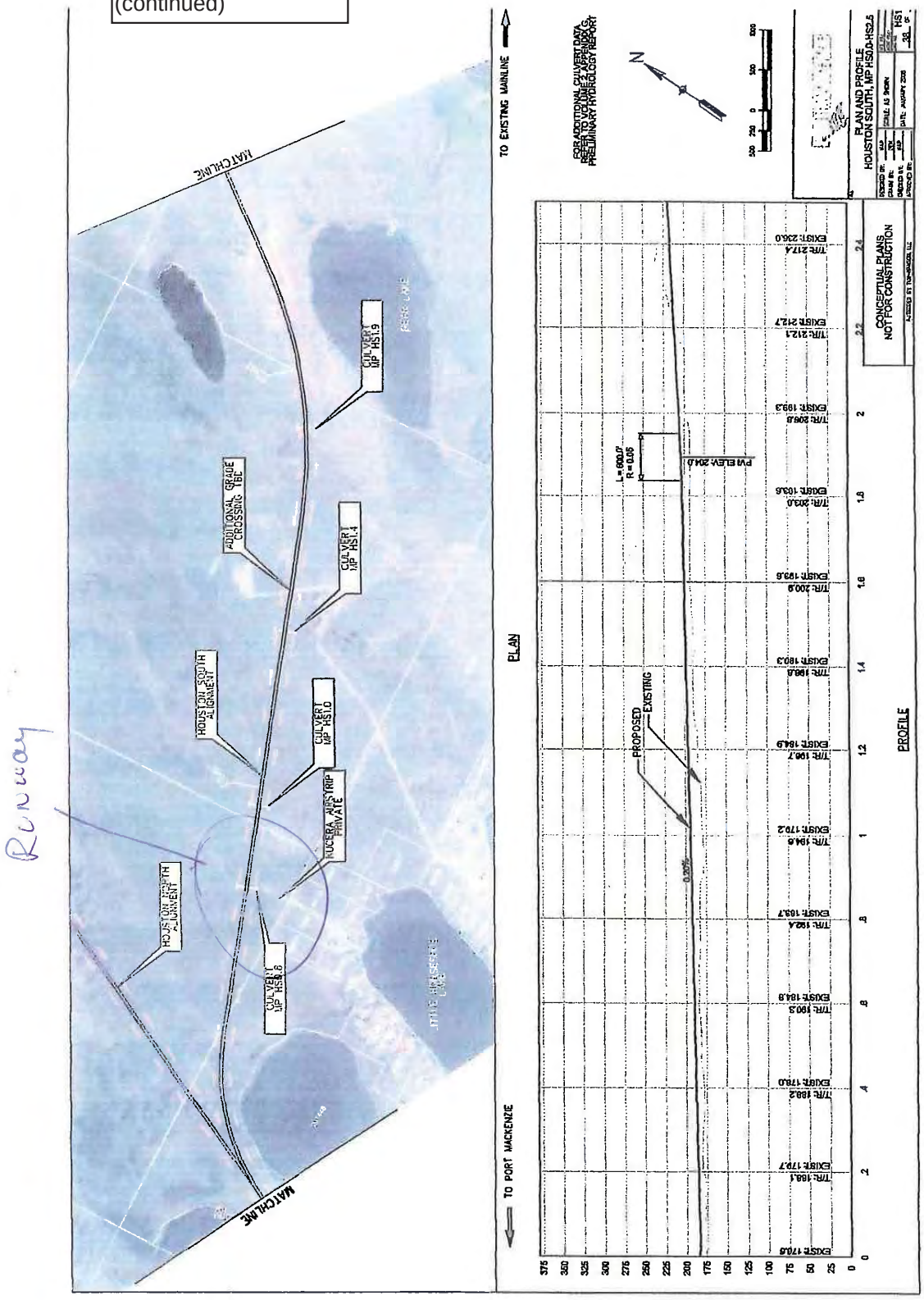
Appears to be touching the End of My Runway on the north end.

Mike Wheadbee
450 N. Brazil Circle
Big Lake Alaska
907-765-7833 cell

Google Earth: Directions

4/7/2010

Comment Number: 32
(continued)



Comment Number: 33

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Yvonne Sumner
Address: P.O. Box 872992
City, State, Zip : Wasilla, Ak 99687
Phone: 376-8398

What comments do you have about the Draft Environmental Impact Statement?

I am happy to see this project is moving forward. I believe this rail spur will help reduce transportation costs to Interior Alaska and to the Port MacKenzie from Interior Alaska. For many projects and potential projects - mining, manufacturing, and building this rail spur will make the difference in feasibility. I believe the Houston community is most eager to see this spur developed and historically Houston has been the most eager

STB Finance Docket No. 35095

Comment Number: 33

to see industrial development. I am hopeful that some of the trails in this area will see improvement in accessibity due to the rail spur. Also if south central Alaska should suffer a major earthquake the Knik River bridges could become impassable and an alternative route for fuel and supplies will be strategically necessary to supply interior Alaska.

Place Stamp Here

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 34

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: NINA ZAHALEN
Address: PO Box 873014
WASILLA, AK 99687
City, State, Zip :
Phone: (907) 892-7266

What comments do you have about the Draft Environmental Impact Statement?

BIG LAKE ROUTE MUCH TOO COMPLICATED. WILLOW ROUTE CUTS RECREATIONAL / HUNTING, SKIING, HIKING TRAILS, ALSO WILDLIFE AREAS. HOUSTON ROUTES SEEM MOST FEASIBLE.

STB Finance Docket No. 35095

Comment Number: 35

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis
Port MacKenzie Rail Extension Project
Environmental Impact Statement

COMMENT FORM

Your input is an important element in the Draft Environmental Impact Statement phase of this project. To help us incorporate your views and suggestions, please provide your comments below and mail them to the address preprinted on the back of this form. Please write legibly. You may attach additional sheets if necessary. Alternatively, you may submit your comments online at STB's Web site (http://www.stb.dot.gov/) by clicking on "E-Filing" and selecting "Environmental Comments" or by mailing a comment letter to the address provided on the back of this form.

Please include your name and address so that we can add you to our mailing list if you would like to receive subsequent information on the project. Thank you for taking the time to provide us with your comments.

Full Name: Noreen K Austermuhl

Address: PO Box 521281 no mail Del 1905 2 winter term

Big Lake Alaska 99652

City, State, Zip :

Phone: 907-892-8056

What comments do you have about the Draft Environmental Impact Statement?

In reference to speaking AT The Big Lake school meeting I would like to add

I am in support of the rail & Port Activity - I have attended A LOT of the meetings. I know it was mentioned of persons not getting material In the mailing people were asked to check if they wanted to recieve material - I think they just miss some of these / spaces. I have recieved a lot of info. thank you. I do Not Live where the rail will have imediate impact but I do know the Houston RT is A

Comment Number: 35
(continued)

grave mistake - please do not have A RAIL go To
that AREA - It can not be replaced.

I know willow is the best but there Are some
scared LANDS There

good Luck & may God help you in your decision by
guiding you to the best RAIL Extention path not by
cost but by heart

Place
Stamp
Here

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

STB Finance Docket No. 35095

Comment Number: 36

Surface Transportation Board
Incoming Correspondence Record

#EI-18127

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Toby Riddell	Date Received:	04/21/2010
Group:		Date of Letter:	04/21/2010

Submitter's Comments

Locating the rail adjacent to Point MacKenzie Road would create several problems with development of our community. The Point MacKenzie Comprehensive Plan identifies the area around the "T" intersection at Point MacKenzie Road and Ayrshire Road as the best location to develop a community town center. Situating the rail next to Point MacKenzie Road would prohibit development to the West side of the road and promote "strip type" development from the intersection all the way to Port MacKenzie on the East side of the road. The Point MacKenzie Community Council supports the Mac West route since it would have the least impact on our growth and allow better access for residents, business, and visitors. Wasilla and Palmer are both trying to relocate or abandon rails through their cities due to traffic congestion and access problems.

Our home on Carpenter Lake is off of Farmers Road and we would have to cross the rail twice (Mac East/Connector 3) in order to get to work and back home if both crossings are "on grade". Although we sincerely welcome and support the economic opportunities associated with the rail line, it is important to plan for the growth of our community in order to avoid or limit negative impacts from development.

Toby and Kay Riddell
12503 S. Farmers Rd.
Wasilla, AK 99654
(907) 373-7768

Comment Number: 37

Surface Transportation Board
Incoming Correspondence Record

#EI-18131

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Kenneth Farmer	Date Received:	04/22/2010
Group:		Date of Letter:	04/22/2010

Submitter's Comments

in Chater 11 - Grade Safety and Crossing Delay, You publish a schedule of expected delays at anticipated road crossing.

For connector 3 you identify two road crossings; Ayrshire Avenue and West Carpenter Lake Road. However, in actual fact, The connector crosses three roads, Ayrshire Road, West Carpenter Lake Road, and Farmers road, all within the space if a half mile.

No Mention is made of the crossing of Farmers road which woul occur within one hundred yards of the crossing of West carpenter Lake Road. Farmers Road is perpendicular to Aryshire Road and is used as an access Road to several homes on or near Carpenter Lake.

If the connector 3 route were to shift a couple of hundred yards to the west and south, it would only need to cross one road, Ayrshire road, saving two unnecessary and extremely inconvenient crossings.

STB Incoming Correspondence Record

Comment Number: 38

Surface Transportation Board
Incoming Correspondence Record

#EI-18132

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Radlinski, Nicholas J.	Date Received:	04/28/2010
Group:		Date of Letter:	04/28/2010

Submitter's Comments

I can't help but to believe as a resident of the locale where the Port Mac RR extension is under consideration that it is a foolish waste of time and resources when the road system is readily available. If more freight is needed to be moved, than more trucking would adequately solve the problem. The roads are not overcrowded, so my vote will be to scrap the project in it's entirety as folly.
Sincerely,
Nicholas J. Radlinski

Comment Number: 39

April 12, 2010

David Navecky
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

Attention: Section of Environmental Analysis
STB Finance Docket N0. 35095

Regarding: Port Mackenzie
Rail Extension
Draft EIS Comments

Dear Mr. Navecky:

I support a rail extension to Port Mackenzie. I believe this rail extension is important to the State of Alaska to import freight and export natural resources.

I have reviewed the draft EIS and believe the best alternative is the *Mac East, Conn 3, Houston, Houston South.* This alternative has the least impact to recreation lands which is important to me. This alternative will also avoid constructing new crossings of the Little Susitna River and Willow Creek.

This alternative does impact many acres of wetlands, but I believe these impacts can be mitigated easier than recreation and river impacts. I believe that there are construction techniques that will minimize the impacts to surface and sub-surface hydrology. Other impacts can be mitigated through mitigation projects or other off-site mitigation.

Thank you for the opportunity to comment on this important project.

Sincerely

Jim Sawhill
4521 Montrose Circle
Anchorage AK 99502

Cc ARRC
Public Involvement Officer
327 W. Ship Creek Ave.
Anchorage, AK 99501

Comment Number: 40

Surface Transportation Board
Incoming Correspondence Record

#EI-18134

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Julie Peterson	Date Received:	04/29/2010
Group:		Date of Letter:	05/19/2010

Submitter's Comments

The use of the area around our cabins will be destroyed if they put the railroad inside this recreational area.

From the environmental way of looking at it, I would like to make the following coments.
1- The railroad bed will create a "dam" that is 35 miles long. This will keep the surface and ground water from flowing as it is now. We will have more wet lands with big puddles of water. The Willow route is mostly predominately morine soil were the Houston routes are predominately bog and out wash. The Bourgh informed the Alaska Fish and Game that they would have to build bridges over any wet lands that were identified as "bog" or 'out wash." The Willow Route is along a glacial moraine that is above the water table and has less chance of impact on the lakes, rivers or wells.
2- There are more cultural and historic sites along the Huston route.
3- The displacement of wildlife is about the same for the Willow and the Huston route. However the Loons in Crooked lake will be effected by the noise and most likely not mate or lay their eggs.
4- The railroad would directly affect private property within several miles of the route with noise and vibration, restricting recreational use of trails, additional safety issure and visual impact; not to mention the potential of spills in a populated area. Property value will be reduced, quality of life will decrease, and the quiet enjoyment of our land will be effected.

So why put the railroad were it effects the most people? Very few people would be effected by the Willow route.

Comment Number: 41

Ed Manning II
<doc.manning@gmail.com>
04/28/2010 06:17 PM

To naveckyd@stb.dot.gov
cc
bcc
Subject Point McKenzie

Dear People,

I have lived in the Mat Su Borough since 1981, and am a partner in a primary care medical clinic in this area. I live in Inlet View Subdivision, and have always attempted to be a well informed, and active, citizen.

I have been quite disturbed, in recent years, concerning the enormous, and seemingly, uncontrolled spending that has incurred, as a result of Borough management. I have arranged for meetings with John Duffy, and local business owners, concerning this. I have spent many hours, and days researching these spendings, and have e-mailed, and called my concerns in to him, and to most of the Assembly members, as well as to the present, and previous, Mayor. I feel that our concerns, for the most part, have been completely ignored.

I, as well, as most of my friends, and acquaintances, want to see an end to the wasteful spending on the Port, and the Ferry, on Point McKenzie. We, also, would like to see a complete halt to the spending on the Prison project, until it is thoroughly studied, and felt to be a viable fiscal investment for the citizens of this Borough. All that we can see is an increase in taxes, and for no gain to the citizens of this wonderful place that we have lived in. I am unable to find anyone that I know that is interested in spending any additional dollars on any of these projects. Should these monies be available, they can be better spent, elsewhere.

I am available by phone, or e-mail, and would be more than happy to answer any of your questions concerning this. My home phone is: 907-373-6361. My clinic phone number is: 907-357-0820.

Your attention to these concerns, during these very tough, and troubling, financial times, is greatly appreciated.

Respectfully,

Ed Manning, II

--
Ed

Comment Number: 42

Surface Transportation Board
Incoming Correspondence Record

#EI-18138

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	E. Joe Griffith	Date Received:	04/29/2010
Group:		Date of Letter:	04/29/2010

Submitter's Comments

Letter re: Comments on DEIS Alaska Railroad Corp. Construction and Operation of Rail Line Extension to Port MacKenzie, Alaksa (2 pg letter and 2 attachments).

Image Attachment(s)

Navecky STB Finance re RR ext PtMacK.pdf

Navecky STB Finance re RR ext PtMacK.pdf

Comment Number: 42 (continued)

MEA

April 29, 2010

David Navecky
STB Finance Docket No 35095
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Re: Comments on DEIS Alaska Railroad Corporation Construction and Operation of Rail Line Extension to Port MacKenzie, Alaska

Dear Mr. Navecky:

Matanuska Electric Association, Inc. (MEA) hereby submits its comments on the above referenced Draft Environmental Impact Statement. MEA is the public utility certificated by the State of Alaska to provide electric utility service to Port MacKenzie and the geographic area within which all build options evaluated in this DEIS are located. For the reasons discussed below, this project is likely to impact MEA's ability to provide reasonably reliable and affordable electric utility service in the affected area. MEA proposes herein mitigation for this impact.

As noted in the DEIS, construction of the proposed rail line extension to Port MacKenzie will result in additional development in the Port area. *See*, DEIS Section 2.1.1.10. MEA currently serves bulk commodity conveyor belts in other parts of its service territory that require up to 1,000 kW of energy per drive motor. Bulk commodity conveyor belts can cause electric system wide voltage fluctuations unless the system providing electric utility service to them is extremely robust.

Currently, MEA's distribution service to the Port MacKenzie area is one three-phase feeder. With the load increases caused by the new Goose Creek Correctional Center and related infrastructure, MEA is planning to further upgrade service through construction of a new substation in the Port area with 115 kV sub-transmission service from Teeland Substation near Wasilla and a 230 kV tap into the existing Chugach Electric Association, Inc. (Chugach) transmission line from Beluga Power Plant. These upgrades should ensure that there is adequate capacity to serve foreseeable Port area loads, but additional voltage support could still be required to meet service quality standards for large fluctuating loads such as bulk commodity conveyor belts.

Additionally, service to the Port area would be almost entirely dependent upon the Chugach transmission line from Beluga Power Plant to Teeland Substation being operational. In just the past year, migration of the Susitna River has taken that transmission line out of service for an extended period of time. It is likely that future service interruptions will occur given the remote area through which this Chugach transmission line is located.

MEA believes that more reliable and better quality service could be provided to the increased electric load that will be developing in the Port area, partially as a result of the rail line extension project, if provision was made for direct transmission and sub-transmission

MATANUSKA ELECTRIC ASSOCIATION, INC. • P.O. Box 2929 • Palmer, Alaska 99645 • t 907.745.3231 • f 907.761.9368 • www.mea.coop

Comment Number: 42 (continued)

interconnections between the new Port MacKenzie area substation and the Alaska Intertie at Douglas Substation in Willow. This would improve service to the Port area by providing better access to the generation resources owned by Golden Valley Electric Association in Healy, Fairbanks, and North Pole.

As noted in Section 13.1.4.1 of the DEIS, current land ownership in the subject area is complex. The Alaska Railroad Corporation (ARRC) proposes to acquire a 200' wide right-of-way for this project, which includes space for an above ground power line. *See*, Section 2.1 and Figure 2-1 of the DEIS. Further, as noted in Sections 2.1.1.1 and 2.1.1.2 of the DEIS, the Alaska Railroad Corporation (ARRC) will be clearing vegetation from virtually the entire right-of-way and will be constructing an access road along the rail line. Unified land ownership, access roads, and vegetation cleared for other purposes will make the rail line route an ideal location for construction of the needed transmission and sub-transmission interconnection between the Port area and Willow.

MEA is not seeking a requirement that the ARRC build the needed transmission and sub-transmission interconnections. Nor is MEA seeking a requirement that the ARRC issue MEA an easement for construction of this transmission and sub-transmission interconnection within the right-of-way that the ARRC has not yet acquired. However, MEA does believe that the FEIS should include an analysis of the impacts of the transmission and sub-transmission interconnection lines, in addition to the distribution power line that is shown in Figure 2-1. Construction of these interconnections in or immediately adjacent to the ARRC right-of-way is clearly a foreseeable consequence of any build option selected.

To facilitate this analysis, MEA has attached hereto a revised Figure 2-1 for utilization in the FEIS that includes a typical pole that would serve the long-term needs of project area. This typical pole would be capable of holding a 230 kV transmission line circuit, a 115 kV sub-transmission circuit, and a nominal 25 kV three-phase distribution circuit. MEA has also attached for your reference a modified version of DEIS Figure S-1 showing existing and planned electric transmission and sub-transmission systems. Questions related to this pole design and routing requirements can be directed to MEA's Director of Engineering, Gary Kuhn.

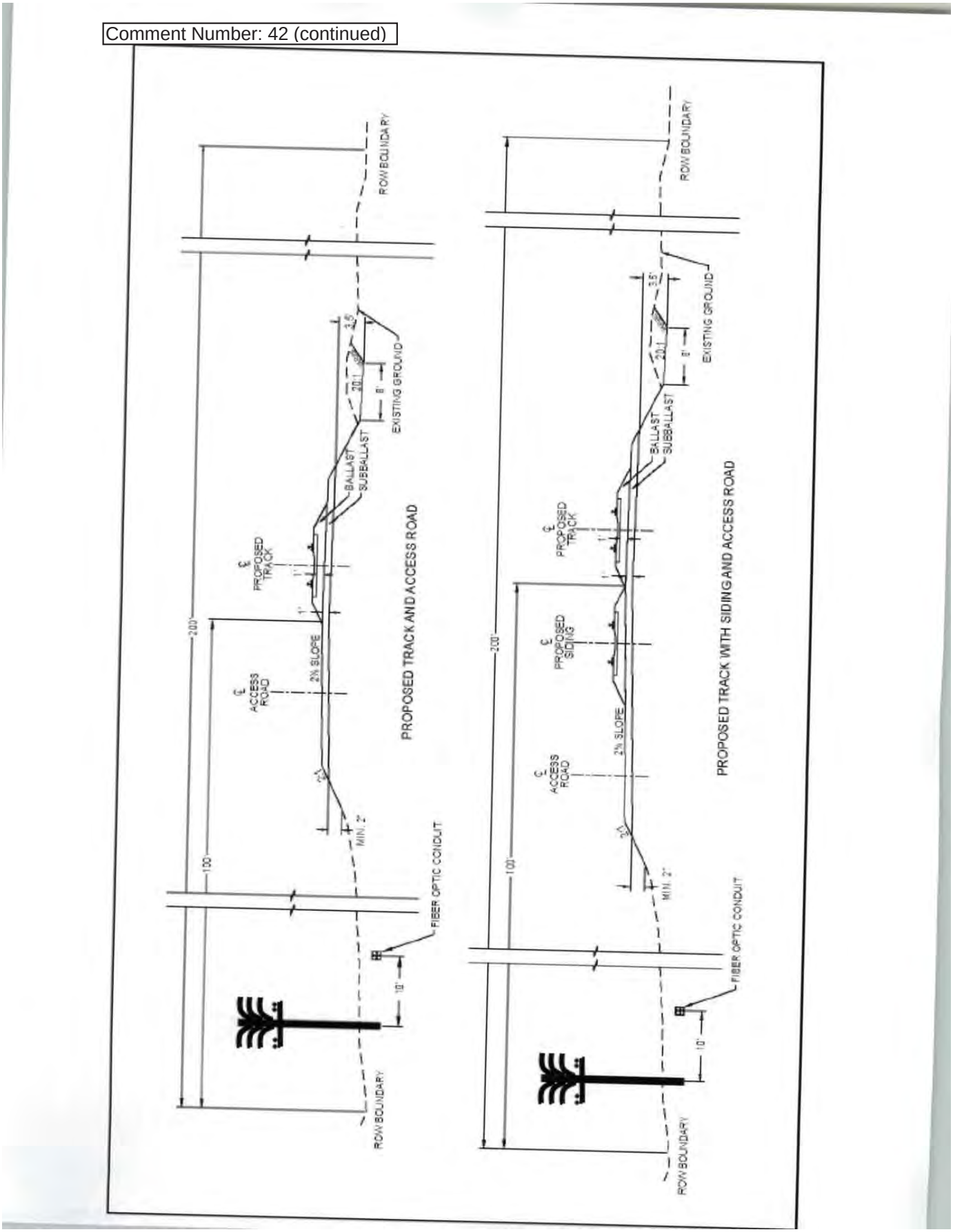
Sincerely,

E. Joe Griffith
General Manager

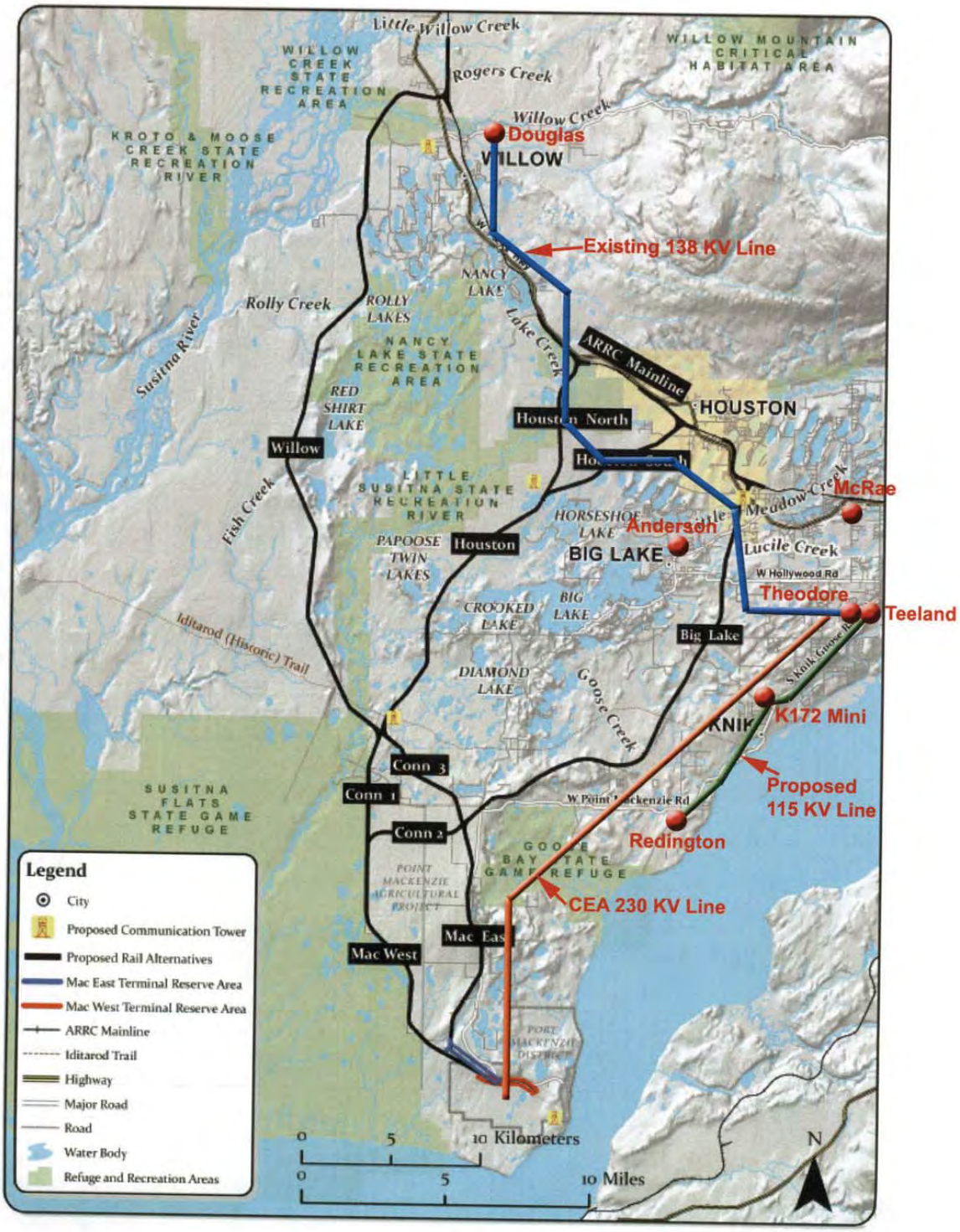
Attachments

nv - \\Susitna\gmlegal\SR COUNSEL\Ltrs\Misc\2010\Navecky STB Finance re RR ext Pt MacK.doc

Comment Number: 42 (continued)



Comment Number: 42 (continued)



Comment Number: 43

Surface Transportation Board
Incoming Correspondence Record

#EI-18140

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Duane Maney	Date Received:	05/03/2010
Group:		Date of Letter:	05/03/2010

Submitter's Comments

I have reviewed the EIS for the Port MacKenzie Rail Extension and it appears very obvious that the Willow route has the most severe negative impact to the environment in many accounts. It would have huge impacts to all classes of wetlands as well as several creek crossings. The Willow corridor would disrupt prime basically untouched wilderness/forested areas with huge impacts to wildlife. The Houston and Big Lake routes are through fairly populated and developed areas. The Big Lake route would have little impact to the environment, and Houston route would have slightly more impact but still nothing as severe as the Willow route. The Nancy Lake State Recreation Area is a very pristine natural park full of wildlife and scenic Alaskan beauty, but still within close proximity to communities, and also with good accessibility. The State Of Alaska DNR has performed a wonderful job throughout the decades preseverving its beauty and pristiness. Accessing and exploring the park is like going back in time. Its quiet and serene, in a very theraputic way. Constructing a railroad adjacent to it would be a travesty to say the least. Building a railway to a dock that is really unwarranted since we already have rails to three deep water ports in the southcentral area seems like a waste of time and money. The Willow route is also the most expensive and time consuming due to both permitting and construction procedures, having to build through wetlands and creek crossings. As you can tell I am very much opposed to the Willow route, and actually opposed to the extension project in its entirety. I know that the MSB is in a financial bind with many problems to resolve in their fast gromwing communities, therefore I see the railway as a way for them to make revenue in many areas once it is built. However at the stake of ruining a very special wonderful piece of Alaskan splender it is not worth the price we would pay in the end for the loss. It would be a shame.

Thank you for your time, and I appreciate your consideration in regard to my concerns.

Duane Maney

Comment Number: 44

Surface Transportation Board
Incoming Correspondence Record

#EI-18141

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Becky Long	Date Received:	05/05/2010
Group:	Alaska Survival	Date of Letter:	05/05/2010

Submitter's Comments

5/5/10
Comment on Draft EIS Construction and Operation of a Rail Line Extension To Point MacKenzie by the Alaska Railroad Corporation

THIS IS TO SUPPORT THE NO ACTION ALTERNATIVE.

THERE IS NO ENVIRONMENTAL AND ECONOMIC DATA THAT SUPPORTS THE EXISTENCE OF THIS RAIL EXTENSION WHICH IS PROPOSED TO BE BUILT BY FEDERAL FUNDS. THIS SUBSIDIZED PROPOSAL THREATENS THE NON-RESOURCE EXTRACTIVE ECONOMY AND RESIDENTIAL QUALITY OF LIFE IN THE RAILBELT.

On the face of it, why would a mere 30 –48 mile new rail line threaten the integrity of the railbelt current economy? The current Alaska State and MatSu Borough administration desire this proposed project in order to jumpstart a mining and timber harvest boom along the railbelt and to expand the current Port MacKenzie. The administrations are inflating the number of construction jobs and the economic profit. The costs to our environment are not figured into their profits.

This new rail does not promote long term growth and development because it will negatively impact the current economy of the Susitna Valley by bringing development and environmental destruction to fish and game habitat, water quality, dedicated and undedicated trail systems, structured and dispersed recreation areas, fishing and hunting. It will blow a hole through undeveloped forests now creating developed access that will cause irrevocable changes.

The 2007 Mat Su Borough funded Cole report states that the non-consumptive uses of the resources in the borough exceed the consumptive uses by a ratio of about 20 to 1 which in dollars is $363 million in tourist expenditures compared to $18 million for consumptive uses such as commercial logging.
The Alaska Department of fish and Game, Division of Sport Fishing has estimated that for 2007, in southcentral Alaska, $989 million($561million residents, $428 million non-residents) was spent by sport fishers on fishing trips, equipment, and development and maintenance of land use. The “Opportunity to go fishing has a value often difficult to measure in dollars. But it is an important part of the economy and a vital source of income to many in small towns and cities.”
Why am I mentioning these figures for an area larger than the proposed extension? If this proposed rail is to jump start an industrial economy, then our current economy for the railbelt and the Mat Su Borough is affected by the cumulated impacts.

This proposal would detrimentally lower the quality of life for the residents of Willow, Houston, and Big Lake by the noise and environmental pollution, and displacement of trails and homes.

The money that has been spent on this whole process, and the subsidies to design and build the project would be better spent on developing the Port of Anchorage.

The ARRC has an agenda to spray herbicides on their rail line as a vegetation control strategy. They are not dedicated to finding non-herbicide alternatives to control in spite of overwhelming majority public opinion and comment against herbicides. Thus, they will want to spray this new line and we will have to deal with these toxins ending up in our waters, fish and wildlife and our bodies causing much illness.

A development project like this will cause the influx of invasive plant species. And since the powers that be have made this the new boogy man and provided many federal and state grants to fight such, eventually there will be herbicide applications to control invasive plants.

Why was there no draft EIS plan in the Talkeetna and Trapper Creek libraries since the cumulative impacts will affect these areas? This is a deficiency in the process.

The National Marine Fisheries Service will be looking and commenting on the draft after the public comment period closed for the critical habitat designation for the Endangered Cook Inlet Beluga Whale. But the public will not have access to that comment. This is a deficiency in the process.

In conclusion, the No Action Alternative is necessary for a project that will wipe out wetlands, property, rural living and recreational venue and non-extractive economies. There is no real economic justification besides being based on “long-term

Comment Number: 44 (continued)

possibilities" of increasing an industrial economy. NO MITIGATION MEASURES COULD EVER BE ENOUGH TO MAKE UP FOR THE LOSSES.

Becky Long, Board of Director, Alaska Survival
Box 320, Talkeetna AK 99676 Issues320@hotmail.com

5/5/10
Comment on Draft EIS Construction and Operation of a Rail Line Extension To Point MacKenzie by the Alaska Railroad Corporation

THIS IS TO SUPPORT THE NO ACTION ALTERNATIVE.

THERE IS NO ENVIRONMENTAL AND ECONOMIC DATA THAT SUPPORTS THE EXISTENCE OF THIS RAIL EXTENSION WHICH IS PROPOSED TO BE BUILT BY FEDERAL FUNDS. THIS SUBSIDIZED PROPOSAL THREATENS THE NON-RESOURCE EXTRACTIVE ECONOMY AND RESIDENTIAL QUALITY OF LIFE IN THE RAILBELT.

On the face of it, why would a mere 30 –48 mile new rail line threaten the integrity of the railbelt current economy? The current Alaska State and MatSu Borough administration desire this proposed project in order to jumpstart a mining and timber harvest boom along the railbelt and to expand the current Port MacKenzie. The administrations are inflating the number of construction jobs and the economic profit. The costs to our environment are not figured into their profits.

This new rail does not promote long term growth and development because it will negatively impact the current economy of the Susitna Valley by bringing development and environmental destruction to fish and game habitat, water quality, dedicated and undedicated trail systems, structured and dispersed recreation areas, fishing and hunting. It will blow a hole through undeveloped forests now creating developed access that will cause irrevocable changes.

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The Alaska Department of fish and Game, Division of Sport Fishing has estimated that for 2007, in southcentral Alaska, $989 million($561million residents, $428 million non-residents) was spent by sport fishers on fishing trips, equipment, and development and maintenance of land use. The "Opportunity to go fishing has a value often difficult to measure in dollars. But it is an important part of the economy and a vital source of income to many in small towns and cities."
Why am I mentioning these figures for an area larger than the proposed extension? If this proposed rail is to jump start an industrial economy, then our current economy for the railbelt and the Mat Su Borough is affected by the cumulated impacts.

This proposal would detrimentally lower the quality of life for the residents of Willow, Houston, and Big Lake by the noise and environmental pollution, and displacement of trails and homes.

The money that has been spent on this whole process, and the subsidies to design and build the project would be better spent on developing the Port of Anchorage.

The ARRC has an agenda to spray herbicides on their rail line as a vegetation control strategy. They are not dedicated to finding non-herbicide alternatives to control in spite of overwhelming majority public opinion and comment against herbicides. Thus, they will want to spray this new line and we will have to deal with these toxins ending up in our waters, fish and wildlife and our bodies causing much illness.

A development project like this will cause the influx of invasive plant species. And since the powers that be have made this the new boogy man and provided many federal and state grants to fight such, eventually there will be herbicide applications to control invasive plants.

Why was there no draft EIS plan in the Talkeetna and Trapper Creek libraries since the cumulative impacts will affect these areas? This is a deficiency in the process.

The National Marine Fisheries Service will be looking and commenting on the draft after the public comment period closed for the critical habitat designation for the Endangered Cook Inlet Beluga Whale. But the public will not have access to that comment. This is a deficiency in the process.

In conclusion, the No Action Alternative is necessary for a project that will wipe out wetlands, property, rural living and recreational venue and non-extractive economies. There is no real economic justification besides being based on "long-term possibilities" of increasing an industrial economy. NO MITIGATION MEASURES COULD EVER BE ENOUGH TO MAKE UP FOR THE LOSSES.

Comment Number: 44 (continued)

Becky Long, Board of Director, Alaska Survival
Box 320, Talkeetna AK 99676 Issues320@hotmail.com

Comment Number: 45

Surface Transportation Board
Incoming Correspondence Record

#EI-18142

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Gary Swearer	Date Received:	05/05/2010
Group:		Date of Letter:	05/05/2010

Submitter's Comments

We feel if a RR spur must be built, the MOST sensible route would be the "Willow Route".

Image Attachment(s)

rail spur - EIS.doc

rail spur - EIS.doc

Comment Number: 45 (continued)

It has recently been brought to our attention that there are plans to construct a RR Spur from Port McKenzie to the north-south main RR line.
On April 11,2010 my wife and I attended an EIS meeting where comment was taken regarding the various spur plans. All making comments supported one spur over another, with the exception of Mrs. Grace Wedby, who called attention to the problems with increased siltation occurring above and below the new port facility (Port McKenzie) and on the Knik Shelf (located in Cook Inlet. The increased siltation has occurred only since the construction of Port McKenzie and has resulted in an increase in dredging costs by ten fold. This increased silt buildup was also reported in the "Alaska Journal of Commerce" (posted on the web on June 19, 2005). To our minds this report calls into question the *existence* of the port facility. Within this time period the streams in the Mat-Su Valley have experienced reduced salmon runs (of all 5 species of salmon). Cook Inlet has also had a problem with the population of beluga whales suffering a sharp drop, resulting in their being placed on the "Threatened Species" list. Perhaps there are correlations between the increased silt flowing into the inlet and the plummeting marine stocks (?).
The "Big Lake Spur Route" will pass very close to both Echo and Homestead Lakes (within 2500-3000 feet). Both lakes currently have numerous waterfowl nesting habitats for the following species: loons, swans, sandhill cranes, mallard ducks, goldeneye ducks and other various duck and wildfowl species. A rail line in close proximity would cause most of the species listed to seek other nesting areas and possibily result in lost nesting seasons.
The Aroura Dog Mushing Club is located at the end of Gonder Road. There are numerous mushing trails in the area (including connectors with the Iditarod Trail). Also located in the area are many snowmachine trails. The Big Lake Spur Route would cause a major disruption of many of these trails.
The woods and wetlands that would be destroyed by a rail spur are home to many moose, bear, fox, lynx, grouse, etc. The loss to the area of these animal species would also result in a loss of quality of life for the human inhabitants of the area.
It seems to us that at a time of reduced oil production on the North Slope and falling revenues for the State of Alaska, the expenditure of millions (perhaps billions) of dollars that has serviced nine (9) ships since its opening over seven (7) years ago is a **TERRIBLE WASTE** of taxpayer dollars. At some point, someone has to make the hard decision and say, "Enough is enough, lets find a better way to use these funds.

Comment Number: 46

Surface Transportation Board
Incoming Correspondence Record

#EI-18143

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Ken Hilfiker	Date Received:	05/06/2010
Group:		Date of Letter:	05/06/2010

Submitter's Comments

In the last days of the legislative session, approximately $57 million was added to pay for part of an environmental impact study and also part of the rail starting at the Point McKenzie dock heading North. This appropriation was made without public meeting or public input.

Since no final decision has been made on the four options for the rail, one of which is "do not build", I think the appropriation of funds is premature. If a decision to issue a permit is made in the future, the funds could be allocated at that time. South Central Alaska already has three deep water ports (Whittier, Seward, and Anchorage-which is only a couple miles from Point McKenzie) that are accessible by rail. Building a rail spur at Point McKenzie that has no permitted connection has the potential to be labeled the ”rail to nowhere” and an embarrassment to Alaskans and our government.

In addition, I do not agree with the position of DNR as quoted in the Draft Environmental Impact Study for the Rail Extension to Point McKenzie stating that the Willow route which divides the Willow Creek and Nancy Lake State Recreation Areas has “no facilities or specific resources within that area that would be adversely affected”. Since I recreate in Nancy Lake State Recreation Area nearly every month of the year, I can tell you the noise from the current location of the railroad detracts from the wilderness experience I have on Red Shirt Lake. The current location of the track is 8 miles away. Putting a railroad within 1 mile of Red Shirt Lake will decrease the recreational experience in one of the Mat-su nicest recreation areas.

Since the building of the rail is years away if at all, I feel there are more pressing needs for these state funds, such as the Bullet Gas Line. The bullet line will ensure continued diverse, economic growth to South Central Alaska and I prefer to be warm in my home in the next decade.

Thank you for your consideration

Ken Hilfiker

Comment Number: 47

Surface Transportation Board
Incoming Correspondence Record

#EI-18144

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	John Strasenburgh	Date Received:	05/06/2010
Group:		Date of Letter:	05/06/2010

Submitter's Comments

STB Finance Docket 35095.

To whom it may concern:

These are my comments on the Draft Environmental Impact Statement (DEIS), Alaska Railroad Corporation Construction and Operation of a Rail Line Extension to Port MacKenzie, Alaska. STB Finance Docket 35095.

If there is a build option, I support “Mac East” at the south end and “Houston South” at the north end.

However, there is considerable question in my mind as to the financial viability of the rail extension. I have seen the “Benefit-Cost Assessment of the Port McKenzie Rail Extension,” prepared by Steve Colt and Nick Szymoniak, Institute of Social and Economic Research, dated March 10, 2008. I believe the assumptions that form the basis of this analysis are unrealistically optimistic (e.g., “coal to Agrium”) and that before proceeding to a build alternative, further cost-benefit analysis must be performed to confirm that this proposed extension makes financial sense.

The only acceptable build option, in my opinion, is the “Mac East/Houston South” alternative. The DEIS considers Section 4(f) of the National Environmental Policy Act (“NEPA”) and discusses the impacts that a rail extension, under each alternative, on public parks, refuges, and recreation areas.

Such impacts to 4(f) resources under the Mac West, Willow, and Houston North alternatives are significant and unacceptable, and these alternatives must be ruled out.

Feasible alternatives exist in Mac East for the southern portion and Houston South for the northern portion, both of which have minimal impacts to 4(f) resources. Although the Big Lake alternative has minimal impacts to 4(f) resources, it has impacts to residences and archeological resources, where Houston South does not.

Hence, if the rail extension is to be built, the Mac East/Houston South route is the only acceptable alternative, and is the only one I would support.

Thank you for this opportunity to comment.

Comment Number: 48

Surface Transportation Board
Incoming Correspondence Record

#EI-18145

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Eric E Egeland	Date Received:	05/07/2010
Group:		Date of Letter:	05/07/2010

Submitter's Comments

Thank you for all of your hard work. I am submitting my comments on what I desire to see as an outcome in the Pt. Mac project IF it is to happen. First off I am not in favor of the extension b/c of its impact on wetlands in the Valley. My biggest concern is that which ever rout is picked that the Houston Route be AVIODED IF AT ALL POSSIBLE. I write my comments as a long time Alaska photographer and birder. I believe that the impact to wetlands would be disasterious to migratory bird habitat and life cycle. The area just east of the Papoose Lk area has many groups and populations of Trumpertor Swans, Sand Hill Cranes, many species of geese and to nurmourous of ducks to name. I am asking that the routes of Willow and Big Lake be choosen before the Houston route.

Comment Number: 49

Surface Transportation Board
Incoming Correspondence Record

#EI-18146

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Joan Egeland	Date Received:	05/07/2010
Group:		Date of Letter:	05/07/2010

Submitter's Comments

concerning the port mackenzie rail extension project: I do not want the Houston alternative, I don't think any of the alternatives are ideal but especially not Houston. I don't like the fact that it separates state recreation areas that are highly used by people in the big lake area. I don't like the high impact it will have on the wetlands surrounding the area.

Comment Number: 50

Surface Transportation Board
Incoming Correspondence Record

#EI-18147

Correspondence Information			
Docket #:	**FD 35095 0**		
Name of Sender:	Peter Sedgwick	Date Received:	05/07/2010
Group:		Date of Letter:	05/07/2010

Submitter's Comments

As a land owner in Point MacKenzie area I would like to make an input to the proposed railway extention in STB 35095. My major concern is the safety of the railway/road crossings. I feel the Mac West route would have the lowest impact on the residence and have the fewest vehicle driving across the track.

Comment Number: 51

Surface Transportation Board
Incoming Correspondence Record

#EI-18148

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Daniel E. Smith	Date Received:	05/09/2010
Group:		Date of Letter:	05/09/2010

Submitter's Comments

May 9, 2010

To: David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-001

Re: Proposed Alaska Rail Line Extension to Port MacKenzie; Draft EIS

After review of the Draft EIS it appears as if the Willow route makes the least sense from many perspectives. As noted in the Draft EIS, it is the most expensive, crosses the most streams and rivers and cuts through the most recreation areas. Of particular concern is the impact on Recreation Areas.

On occasion we find a rare place worth more than another for some inherent qualities that exist within that area and we attempt to preserve those qualities and that area so that they may be enjoyed. Such is the case with the Recreation Areas that the Willow route proposes to cut through.

The Draft EIS points out the obvious drawbacks, such as noise, vibration, negative hunting and wildlife impacts, access restriction across RR right of way (trespass) and other limitations that will be imposed on the recreation areas referenced. The affected recreation areas are close enough to population centers that they actually get used by many people for the purpose that they were intended and not as preserves or refuges where access is limited by a more remote situation.

In short, people use and enjoy these places for the qualities they have to offer. I know of no one who currently defines their recreation activities in these areas to include the presence of a railroad. The Willow railroad spur will not enhance recreational activities. A railroad corridor through these recreational areas will in fact have an adverse affect on all recreation activities. Recreation, be it in the form of snowmachine riding, skiing, hunting, fishing, or just the quiet enjoyment of a unique area, is the purpose for which these Recreation Areas were established.

Please select a route other than the Willow route.

Sincerely,

Daniel E. Smith
8945 Emerald Dr.
Anchorage, Alaska 99502
(907) 244-1811

Comment Number: 52

Surface Transportation Board
Incoming Correspondence Record

#EI-18149

Correspondence Information			
Docket #:	**FD 35095 0**		
Name of Sender:	Edward and Brenda McCain	Date Received:	05/10/2010
Group:		Date of Letter:	05/10/2010

Submitter's Comments
See attached letter

Image Attachment(s)
Letter to STB.docx

Letter to STB.docx

Comment Number: 52
(continued)

To: David Navecky May 6, 2010
Surface Transportation Board

Re: Port Mackenzie Rail Extension Project
FINANCE DOCKET NO. 35095

We are strongly opposed the proposed railroad route that begins in Willow for the following reasons:

- The proposed route beginning in Willow is one-third longer than the other routes.
- It is unconscionable that this route, which will cost $100 million more of the taxpayers money than the other routes is even being considered
- The Willow route, being 1/3 longer than the other routes through winter moose habitat means 1/3 more moose will be killed by the railroad than through the other routes.
- The route from Willow and west of Red Shirt Lake has deeper snow than the other routes, which will result in many more moose using the railroad tracks for travel.
- If a train had to go from Anchorage to Port McKenzie, it would have to travel all the way up to Willow and then down to Port McKenzie, which is 64 miles longer than if the Big Lake Route were in place.
- To the east, where the other routes originate, there is less and less snow (which is why the Iditarod sled dog race was moved to Willow).
- The EIS Willow #2 noise study aerial photograph has a big, solid color purple dot that completely covers our house and it cannot be seen. This makes it looks like there is nothing there to be impacted by this area that the railroad is expected to cause an unacceptable level of noise. This should be changed so that it is apparent that there is a residence in that area.
- In reviewing the EIS, it appears that the negatives of the Big Lake route are thoroughly examined, but not the Willow or the Houston routes. This gives the impression that the Big Lake route is being viewed differently and being removed from consideration from the outset.

- WILLOW IS A RARE TREASURE IN THE WORLD TODAY WITH PHENOMENAL TRAILS AND RECREATION AREAS UNIQUE EVEN IN ALASKA. THE AREA IS ENJOYED BY ALL, NOT JUST THE LOCAL RESIDENTS. IF THIS IS DESTROYED BY A RAILROAD BI-SECTING IT, IT CANNOT BE REPLACED.

We are opposed to the RR going to Port McKenzie utilizing ANY OF THE THREE ROUTES and support the "No railroad extension option" for the following reasons:

- It has the strong potential for being "The railroad to nowhere."
- The current railroad line and the existing Port of Anchorage (3 miles across the Cook Inlet) are obviously under-utilized.
- It is not known how usable the dock at Port McKenzie will prove to be due strong currents and major ice problems.

Comment Number: 52
(continued)

- The location of the dock was picked in part because they said with the strong currents it would be self-scouring and would not need dredging. Already the pulp ships have had to untie from the docks at times due to heavy ice conditions and strong currents.
- Are we going to create an environmental disaster? At Kenai there have already been several incidents of strong tides and heavy ice conditions that have caused the ships to break loose from the docks and cause environmental incidents and the conditions are a fraction of those at Pt McKenzie.
- The EIS addresses the noise issue using a factor of 10 trains during the day for every one that runs at night, but the reality is that along the current rail line the majority of the freight trains run at night.
- Section line easements- Even though there are no existing roads in this area at present there are easements on the protracted section lines. The Matanuska Susitna borough and the State of Alaska have not allowed these easements to be vacated until equal or better access has been provided. Is the railroad going to be allowed to vacate these easements and not allow access across the tracks?
- The State of Alaska says there is a fifty foot pedestrian easement along all major river, streams and lakes that must be honored. Is the railroad going to block them?
- The Mat-Su borough is a 2nd class borough and does not have road powers except in individual, limited road service areas. We don't think it is right that the RR should be able to force these costs on the local road services areas which have very limited budgets, and then make the local taxpayers pay through their property taxes as they have done in the past. Who is going to pay for building any of the crossings in the future?
- The RR has a bad reputation for not allowing any new crossings. In spite of the rapid growth in the area, we don't believe any new RR crossings have been allowed in the past 30 years in the Mat-Su borough. If a person's land is divided by the railroad, they might as well let it go for taxes because they will not have access to it.

Additionally…..

- The coal fields from Tyonek , Chuit River and Beluga are being considered for development with a 10 mile long conveyor belt to bring the coal to tidewater. If this does occur, will the RR be able to compete when they will be shipping the coal over 200 miles to bring it to tidewater?
- This project is going to put the Seward coal loading facilities out of business. Who will compensate the community for this economic loss? Who will pay for the equipment no longer used?
- Will the equipment at Pt McKenzie no longer be needed when these other areas then are developed just 10 miles from the tidewater?

Edward and Brenda McCain PO BOX 27 Willow, AK 99688

907-495-1318 edwardmccain@mtaonline.net

STB Incoming Correspondence Record

Comment Number: 53

Surface Transportation Board
Incoming Correspondence Record

#EI-18150

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Tara Oney	Date Received:	05/10/2010
Group:		Date of Letter:	05/10/2010

Submitter's Comments

In Regards to STB 35095 As a resident for 12 years on Point Mackenzie I think that the railroads plan to follow the roads would be catastrophic to our quality of life. Noise pollution and danger to children and wild life in the area. Point Mackenzie is also a critical land to protect the run off into cook inlet. There are alternate routes they can take that would be healthier for residents and wild life.

Comment Number: 54

Willow Area Community Organization
Box 1027
Willow, Alaska
99688

David Navecky
STB Finance Docket N. 35095
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

RE: Comments on Draft EIS May 10, 2010

Dear Mr. Navecky,

The Willow Area Community Organization (WACO) wishes to respond to the Draft Environmental Impact Statement regarding the proposed Port MacKenzie Rail Project (Docket N. 35095). WACO has a special interest in this project since two of the eight proposed Alternative routes will bisect the Willow community, impacting residents, businesses and recreation.

After reviewing the recent Draft Environmental Impact Statement, the membership (Board) concluded that both Mac East, and Mac West Willow Alternatives would have significant negative impacts on the community with no clear advantages, thus voted to oppose these corridors as the preferred alternative. Instead, WACO supports either the Mac East Houston South Alternative or the No-Action Alternative.

Willow is a residential and recreational community that values its parks, trails, lakes and streams and all related outdoor activities. The community grew up around the existing mainline of the railroad where residential, business and recreational areas could locate and develop appropriately. The proposed rail line would bisect existing neighborhoods and parks and would be in parallel with the existing line only a few miles away. Trains traveling at 60 mph, as described in the DEIS, with accompanying noise, vibration and coal dust, would create disruptions and safety concerns unacceptable to families living nearby.

Further, there are no plans mentioned in the DEIS or by the Alaska Railroad to construct a depot at the junction of the spur or the mainline or any other plans that would benefit Willow economically. Many businesses in Willow depend on recreation and the tourism it provides. Fishing guides, tour operators, service stations and stores owners providing gas and supplies know that people coming to Willow to recreate do not expect nor desire to see long, noisy freight trains in a semi wilderness setting.

Comment Number: 54 (continued)

Recreation, natural beauty and seclusion are what the vast majority of people like best about Willow according to the 2009 Willow Comprehensive Community Survey (page 5, view at the MSB website). That is why the environmental impacts on public land and Section 4(f) properties that are describe in the Draft EIS are such important considerations to the community.

There are two very popular State managed Section 4(f) properties within the Willow Segment of the rail line, the Willow Creek and Nancy Lake State Recreation Areas. (SRA). Other 4(f) resources mentioned include trails associated with the West Gateway Trail System. These three heavily visited areas are adjacent to each other and offer extraordinary recreational opportunities for the public throughout the year. Winter activities include snow machining, dog sledding, skiing hunting, and races and events such as the Iditarod Sled Dog Race.

The Willow Creek SRA offers some of the best fishing and floating experiences in Alaska. The DEIS states that the Willow Creek SRA, "receives intensive sport fishing activity… fishing, camping, floating/boating, winter trails, wildlife viewing, and hunting" (13.2-12) The Willow Segment will bisect the heart of the Willow Creek SRA, crossing the historic Lucky Shot Trail and Willow Creek itself. The clearing of vegetation, loss of fish and wildlife habitat and noise/vibration associated with the operations of the railroad will severely compromise the semi wilderness experience people from throughout the State and Nation come to Willow to enjoy.

There are many other public recreational lands not associated with Section 4(f) that will have direct impact by the Willow Alternatives. As described in the Summary chapter of the DEIS, the impacts on these lands with the Willow Alternative will be the most severe in comparison to all other Alternatives. This is in regards to the amount of vegetative loss (S.6.3.1), wildlife and fish habitat loss (S.6.3.2-3), cultural and historical resources (S.6.4) and noise and vibration (S.6.7).

WACO and the city of Houston have agreed through a joint resolution in supporting the Houston South Alternative. This route is consistent with the Houston Comprehensive Plan and has the least environmental effect of all the alternatives as described in the Draft EIS.

The Willow Alternatives will have a unacceptable social and environmental impacts on the Willow Community without any economic benefits. Therefore, the Willow Area Community Organization opposes the Willow Alternative Corridors for the Port MacKenzie Rail Spur and recommends either the Houston South for the preferred alternative or the No-Action Alternative.

Sincerely,

Linda Oxley, chair
Willow Area Community Organization

Comment Number: 55

Kevin C Berg
<kevincberg@gmail.com>
05/09/2010 07:00 PM

To naveckyd@stb.dot.gov
cc
bcc
Subject STB Finance Docket No. 35095

Kevin Berg
2780 Horseshoe Lake Rd.
PO Box 521165
Big Lake, AK 99652
Home 907-892-1278

Re: Port MacKenze Rail Extension Project

Mr. Naveky,

- Please consider this email a "NO ACTION" alternative to the Port MacKenze Rail Extension Project.
- I've sat in on related meetings and more recently read the report prepared by Grace Whedbee + had personal conversation with her. Grace is not a an uneducated nor sadly uniformed person from Big Lake, AK. Quite the contrary, she is experienced in her field and deals with state and federal issues.
- Much of what has been uncovered recently points to inappropriate actions by the Mat-Su Borough Manager, John Duffy. Perhaps I should say "former" Mat-Su Borough Manager, John Duffy. He recently resigned, amid allegations pertaining to fraud and misrepresentation of information supplied to the borough assembly, state of Alaska, and federal government.
- Before hundreds of millions of dollars goes into this project, some serious investigation has to be done, which is why "NO ACTION" is needed at this time.
- I realize STB Finance Docket No. 35095 is dealing with a rail extension, but the rail extension is ultimately connected to the port and the port is affecting the shipping lane to both the Port of Anchorage and Port MacKenzie.
- It is unfortunate that the port was built without formal approval of the ferry, roads, and rail connections.
- The U.S. governments has enough financial problems without making more mistakes. Please take a "NO ACTION" alternative or at the very least open investigation into John Duffy's actions and information + thoroughly review Grace Whedbee's report.

Best Regards,

Kevin C. Berg, O.D.

Comment Number: 56

H. Douglas and Sharon Smole
P.O. Box 520010
Big Lake AK. 99652
907.892.7020

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington DC 205423

April 26, 2010

PORT MAC RAIL EXTENSION PROJECT
Comments After The EIS

Is Port MacKenzie a feasible enterprise?

The Point MacKenzie Port Master Plan (January 1998 amended 1999) states that "*the construction of port facilities appears to be economically feasible if a major user commits to using Point MacKenzie on a long term basis or a combination of users commits to using Point MacKenzie on a long term basis. Should a major development generate long term rail traffic that would cover the cost of access, the Alaska Railroad or State may fund construction of rail access to the port area*".

The Mat-Su Borough Assembly on December 11, 2007 passed a resolution that would begin the EIS studies and could possibly lead to a license to build a Railroad Spur to Port MacKenzie. (See Serial No. 07-139). At that time there was a $2.9 billion plan to use Alaska Railroad (ARRC) bonding authority backed by The State of Alaska for the railroad spur to Port Mackenzie, other railroad improvements and the construction of a coal to gas- gasification plant to be operated by Agrium a fertilizer/chemical producing company. **The construction of the coal gasification plant was cancelled by Agrium shortly thereafter. Additionally the funding scheme was not met with enthusiasm if assets of ARRC and the State of Alaska were to back the bonds.**

Another Point MacKenzie project started by NPI,LLC, was shipping **wood chips to Korea, It has been discontinued and is the subject of ongoing litigation.**

The Port MacKenzie Master Plan tells of another potential major Port MacKenzie user. MIDREX, a subsidiary of Kobe Steel, considered locating a direct iron ore reduction facility at Port Mackenzie. **The Master plan narrative says "*MIDREX decided not to pursue building a facility in Alaska at this time*"**

The promoters of Port MacKenzie and the Railroad Spur tell of **potential facilitation of the development of a World Class lime stone deposit just North of Fairbanks in Livengood. Livengood is about 78 miles north of Fairbanks.** It has been said by

Comment Number: 56
(continued)

promoters that Port Mackenzie has the potential to meet from 5% to 15% of the needs for concrete for the whole United States. The percentage varies depending upon which promoter is speaking. There has been no specific developer mentioned nor has there been even the most general statement of a business plan or is there specific information as to the type of cement being discussed. Is it Natural cement or Portland cement? Why is that relevant? The latter requires mixture with clay, firing in a kiln and then pulverization to create cement. This would require a cement plant and is relatively expensive. Where will this process occur if they are discussing Portland cement? Natural cement is less expensive to produce. **Is this a reality or another 'Alaskan Pie in the Sky'?**

The point of the foregoing discussion is not a dissertation on fertilizer, cement or steel. These facts are relevant to STB deliberations in that they point out there are major issues regarding the feasibility of both the Port MacKenzie and the railroad spur being considered.

The Port MacKenzie Plan further states that--- t**he Borough should not take on bonding the port facility without projected revenue to justify the expenditure.** The fact is that bonding has occured and loans have been received to fund the Port construction. Revenues have not met projections and have fallen far short of expenditures. **A review of Matanuska Susitna Borough Budget information shows that Actual dockage and warfage revenues for the 4 years 2005 through 2008, was a paltry total of $271,706 or an average of $68,000 per year.** During the same 4 year period, **Actual Expenditures were $9,762,340 or average of $2,440,505 per year.** Actual revenue data for 2009/10 is not available to the public, at this time, but revenue is expected to increase, as compared to years 2005 through 2008, due to off loading of cement and steel plus a sale of gravel and transfer to Anchorage for the expansion of the Port of Anchorage.

There is no evidence that there are major viable long term Port use commitments and the meager revenues do not justify the expenditure of many millions of dollars. More important is the question of whether additional hundreds of millions of dollars should be thrown at what appears to be a shaky, ill conceived enterprise.

To compound the problem serious adverse impacts posed by both the Port and the Railroad are surfacing. The very expensive EIS project has revealed many, but not all, such impacts. These include impacts on wetlands, streams, habitat, fisheries, salmon returns, endangered species (Beluga whales) recreational areas, property values and human quality of life. Also under study is the possible adverse impact that Port MacKenzie may have created for the essential Port of Anchorage with the formation of the new MacKenzie shoal and worsening of the existing Knik shoal.

We recognize the need for improved infra-structure to allow for the prudent use of Alaska's vast natural resources. Such development is important and necessary for Alaska and the nation. Equally important is the necessity for Alaskans and visitors to safely gain access to lands for recreation and development. Less than 2% of the

Comment Number: 56
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572,000 square miles of land in Alaska is in private ownership. Prudence and logic thus dictate that construction of projects should avoid adverse impact on the paucity of privately held land.

A FACT BOOK produced by the MSB Planning Department in 2003 describes the "*formation of a* ***Regional Transportation Planning Organization (RTPO)***" consisting of MSB, Anchorage Municipality, Legislative Committees, U.S. Military, and the ARRC. **It is unfortunate that the concept of coordination, of various government bodies and agencies, as described with reference to the RTPO have not occurred**. The RTPO is defunct and coordination of transportation activities has not become a working reality.

Oil wealth has provided many benefits to the government and people of Alaska. Regrettably the oil wealth period of Alaska history is also rife with expensive ill-conceived failed projects. Many major projects have been undertaken where enormous sums of money have been spent to generate short term activity yet the projects have ultimately failed. Notable among many such projects is the $500 million hydroelectric dam study, barley farming and MacKenzie dairy farming. Also a $125 million fish processing plant ($ 50 mil state money plus $75 mil from other sources). The former plant is now a church. There is evidence that history may be repeating itself.

We are concerned and hope that the infra structure projects become more coordinated, cost effective and successful in the long term. The "Build It and They Will Come" attitude is not an appropriate use of public funds. The idea that it is proper to generate short term economic activity, profitable for some industries or businesses, even if the larger main plan is a failure is not reasonable. We do not endorse spending government money on projects before the planning is properly completed with corporate and/or private users committing to the enterprise.

Reasonable people understand that there has been poor planning, financial waste and are deeply concerned regarding the impacts on the physical environment and quality of human life. No mitigating efforts or processes can compensate, after the fact, if such projects are allowed to continue unabated.

We believe the <u>No Build Decision</u> is the most prudent course of action at this time. Additional and clarifying scrutiny of environmental and human quality of life issues must be addressed. Feasibility issues must be resolved and clear effective coordination of all parties must be assured.

Sincerely,

H. Douglas and Sharon Smole

cc Governor Sean Parnell

Comment Number: 57

Sharon Berg
<grebs1@gmail.com>
05/10/2010 11:55 PM

To naveckyd@stb.dot.gov
cc
bcc
Subject Rail Extension - STB Finance Document No. 35095

Sharon L Berg
P. O. Box 521165
2780 S. Horseshoe Lake Rd.
Big Lake, Alaska 99652

May 10, 2010

David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

REFERENCE: Rail Extension

Dear Sir:

Once again, you have allowed the fox to give you a report on the chickens in the hen house and once again you have come up with inaccurate, flawed information. The Borough administration has manipulated this process from the start. Their whole goal was to get the shortest, least expensive route. They have guided the DNR to use 4(f) as a tool to direct the STB in their preferred route with a total disregard for the long term economic benefits of Alaska and the wishes of the general public.

It recently came to the attention of the Transportation Advisory Board of the Mat-Su Borough that there currently exists a rail corridor through the agricultural area of Point MacKenzie. This corridor lies between Mac East and Mac West. The fact that this corridor exists shows a rushed, premature and flawed effort without proper planning and looking at all options.

We need to slow this process down and look realistically at our options. The State of Alaska has many precedents in which State owned land, when necessary for the economic development of Alaska, has done land swaps, lot

Comment Number: 57
(continued)

line readjustment and other methods to allow for utilities and transportation corridors. The current rail line has been in place for 95 years. Before putting in another line, we need to look long term. We need to focus on the economics and environmental future of Alaska. We need to look at the route with the least train energy, best safety factor, the best soils and the least loss of emergent wetlands, not just for this rail extension but for future transportation and utilities corridors.

The rail extension was originally proposed to get coal to Agrium before they were forced to close. That did not happen but we are still working on this rushed, poorly planned agenda. The long term economics of Alaska depends on proper planning. We need to tie any future rail extension into a long term transportation plan. This plan must include not only this rail extension but also a future utilities corridor as well as a road system to open up future development of natural resources and recreation for residents and Alaska's growing tourism.

At this time, I recommend that you make a decision for "No Build". The Borough Administration only looked at short term. The only route they have manipulated (Houston South) is not in the best interest of Alaska's citizens or its economy. While this corridor remains the cheapest to build it has no ability to be used as a transportation or utilities corridor nor does it allow for future commercial or industrial development.

Sincerely yours,

Sharon L. Berg

Comment Number: 58

mgwhedbee@aol.com
05/10/2010 08:47 PM

To naveckyd@stb.dot.gov
cc
bcc
Subject Financial Docket 35095

Grace Whedbee
P. O. Box 520045
Big Lake, Alaska 99652

May 8, 2010
David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington, DC 205423
REFERENCE: Need for Rail Extension
Dear Sir:
In the purpose and need statement of the EIS, the only purpose stated is to serve the Port MacKenzie customers with rail access and to connect the port with the existing railroad. Point of fact is the Port has no new business. The only customers are still NPI LLC and Alaska Manufacturing Contractors (AMC), even though the Port has been there 9 years. NPI is in a lawsuit claiming the port design was changed and is **not** safe and has caused them to lose their customer. I will also show that the Port is not viable and has latent defects that will make it cost prohibitive in terms of economics and the environment.
The applicant claims they can handle the world's largest ships. According to the Point MacKenzie Port Master Plan dated January 1998 and amended May 1999, page 22 states "maximum ship draft would be limited to about 40 to 43 feet. **Knik Arm Shoal is the primary depth-limiting hazard to navigation in this area."**
The port claims to be year round but now Marc VanDongan, port director is saying that he would prefer to shut the port down during the winter months and stockpile freight to go out in the spring. In the Port Master Plan it states "Once a ship has been docked in waters such as Cook Inlet, with its ice and fast currents, pilots require almost perfect dock alignment in order to hold ships in the moored position." Ships have to move 5 times to fills all compartments; therefore 5 perfect dock alignments must be obtained. The Port is clearly not safe during the winter months.
Port claims to be dredge free, however in the Knik Arm Crossing, Hydrology and Hydraulic Environment of Knit Arm, Rev, 2, 24 March 06, base sedimentation charts show a high rate of sedimentation at the deep water port area. The same report, Rev. 4, 30 May 2007 shows even more sedimentation at both the barge dock and the deep water area (see attached). Borough management is still not acknowledging this and has not begun any studies of how this sedimentation is affecting the barge dock or the deep water area.
The applicant claims that Port of Anchorage can't handle dry bulk commodities. They do

Comment Number: 58
(continued)

handle dry bulk commodities, 116,789 tons last year. Any rail loop Port MacKenzie may get in the future will not be started before the Port of Anchorage facilities will be complete with double rail lines. While the Point MacKenzie area has more room for storage, Anchorage's port (with the current expansion) will have more handling capacity, has the railroad area that can be rented by customers and has the Elmendorf AFB that has allowed storage on their land when needed.

According to the Port Comprehensive Plan the bathymetric of the area was never studied prior to building the Port. In an article in Alaska Journal of Commerce, July 19, 2005 Steve Boardman, U.S. Army Corp or Engineers said that "At the time Port MacKenzie was constructed, the Corps was given no data to show how the new port facility would affect the flow pattern or sediment pattern of Knik Arm." No study appears to have been done on the environmental habitat or fish movement around the docks.

The work on the dock was started in 1999 with the ribbon cutting on September 8, 2000. The dock was closed down in November 2000 when the US Army Corps of Engineers say the Port may not be structurally sound. The port was built on top of silt. It cost an additional $880,000 to make the necessary repairs but still no study on how it affects Knik Arms.

Mr. Boardman also talked about the changing dynamics to Knik Arm channel. He said they have gone from dredging 300,000 cubic yards of material annually from the channel to nearly 2 million cubic yards and costs have gone from $3 million to nearly $12 million. They have not been able to determine what is causing the changes but cite the construction at Port MacKenzie and the Port of Anchorage. In the article he talks of building a model to study all factors. This model is now complete and working in Vicksburg, Mississippi. The Port of Anchorage has used the model to monitor the port expansion. **Port MacKenzie continues to make improvement but does not appear to do bathymetric studies or use the model.**

A shoal has developed between Port MacKenzie and Point MacKenzie. Please see the attached NOAA chartlets that show the growth of this shoal. At this time, the ship's pilots are encountering more difficulties in turning around in order to dock at the Port of Anchorage due to this shoal. From Port MacKenzie to Point MacKenzie is 2.75 miles, and this shoal lies between the two points. When asked about this problem, Marc Van Dongen, Port Mackenzie director keeps talking about a shoal 3.5 miles away that has been there for many decades, obviously a totally different area. The Borough management is not only not recognizing this shoal, they sent a letter to our representative, Charlie Huggins, asking that he not procure the money as requested by the Port of Anchorage for the study into how much it will cost to dredge this shoal. In the letter they talk about the area to the West of Point MacKenzie. As you can see from the NOAA chartlet, the shoal is between the Point and the Port, not west of the Point. This letter is an obvious ploy to stop investigation into the shoal until they have procured the rail extension corridor and the request from the State Capital Improvement budget of $57 million for the intermodal area at the port and the $750,000 port expansion grant.

In conclusion, Port MacKenzie was built without proper study and has not lived up to any of its purported abilities. It has proven to be a costly boondoggle and if you allow a rail extension, it will prove to be one of the costliest in Alaskan history. This Port is not viable as ships size is limited by the Knik Arm Shoal, is not safe for winter operations, and is offers no dry bulk good services that are not offered by the Port of Anchorage. In addition, there is evidence that the

Comment Number: 58
(continued)

port will not be dredge free as models show current high rate of sediment depositing is currently taking place. However, the costliest items may be the port's contribution to the increased dredging of the Knik Arms Shoal and the future costs to dredge the Point MacKenzie Shoal. It is vital that you research the Knik Bridge Crossing studies that show the exact downstream shoal formation from the proposed bridge that is seen downstream from the Port. Also of great importance is the damages being done both economically (import of concrete) and physically to the Port of Anchorage due to increasing shoaling. The Port of Anchorage is a Federally Funded, Military strategic port. The Intermodal expansion cost is around $527 million of which 52% is federal monies.
Because the only purpose for the rail extension per the EIS is the Port and the facts show the Port is not viable or needed, **YOU MUST MAKE A "NO BUILD" FINDING.**
Sincerely,

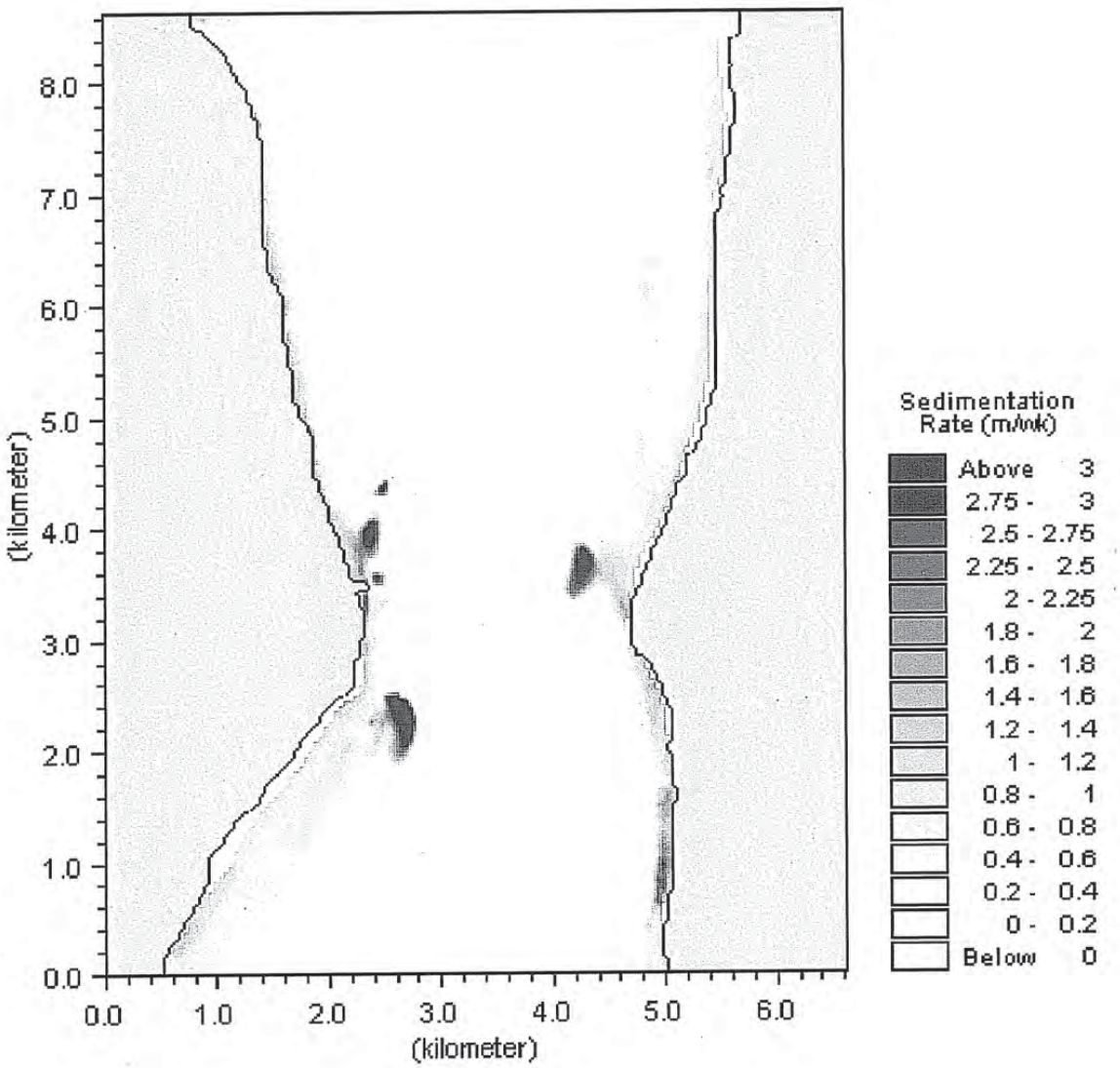
Grace Whedbee
Attachments:

a) Sediment rate from KAC study
b) My historic study of port


Port MacKenzie Sedimentation.docx


PORT MACKENZIE MONEY PIT.doc

Comment Number: 58
(continued)



Base Case

Figure is from the Knik Arm Crossing Hydrology and Hydraulic Environment of Knik Arms Rev. 2, 24 March 06 page 53.

This shows there is sedimentation building at Port MacKenzie

Comment Number: 58
(continued)

PORT MACKENZIE ENDANGERING SHIPPING LANES?

Can we afford to put any more money into Port MacKenzie until we know it is not endangering Alaska's economy and the military defense of America?

- (Quote from Alaska Journal of Commerce) *U.S. Army Corp of Engineers, Steve Boardman when talking on the Knik Arm Bridge said that in 2003 the Corps developed a tabletop and mathematical model that it shared with port officials from Anchorage and the Mat-Su borough. "We drew the bridge as we knew it at the time, with the two causeways," Boardman said. 'What it did was change the flow pattern to the point where it raised red flags that it might increase the flow velocity to the point where it could cause problems."*

  Meanwhile the Corps has in recent years had to dredge the Cook Inlet navigation channel more frequently. The channel, located halfway between Fire Island and Port MacKenzie, is the shipping lane traveled by major cargo ships delivering millions of tons of cargo to the Port of Anchorage. When the navigation channel was built in the late 1990s, the shoal in the middle of the channel was at minus 17 feet and was dredged to minus 39 feet, so ships could avoid delays at low tide.

  Corps engineers still have a lot of unanswered questions about the changing dynamics of that channel, but they do know ***they're gone from dredging 300,000 cubic yards of material annually from the channel to nearly 2 million cubic yards****, Boardman said...* ***At the time Port MacKenzie was constructed, the Corps was given no data to show how the new port facility would affect the flow pattern or sediment pattern of Knik Arm****, Boardman said.*[1]

- Compare Figure #1, a Google Earth map from 1995, prior to Port MacKenzie and Figure #2, a photo after the barge dock was built. They shows that the coastline has been altered. This is the narrowest area in Knik Arms, therefore the fastest flowing water. The study for the Knik Arms Bridge showed that a pier placed in fast currents would alter the speed of the currents and the sediment accumulation rate downstream.

[1] Alaska Journal of Commerce, June 19, 2005. **Influx of silt in inlet increase in dredging costs** by Melissa Campbell

Comment Number: 58
(continued)

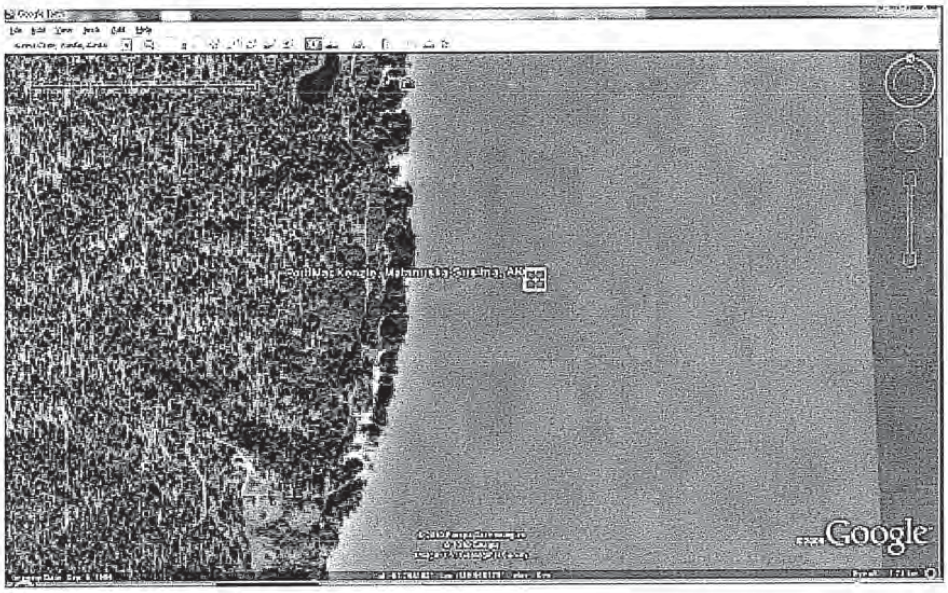


Figure 1 Shoreline prior to port construction

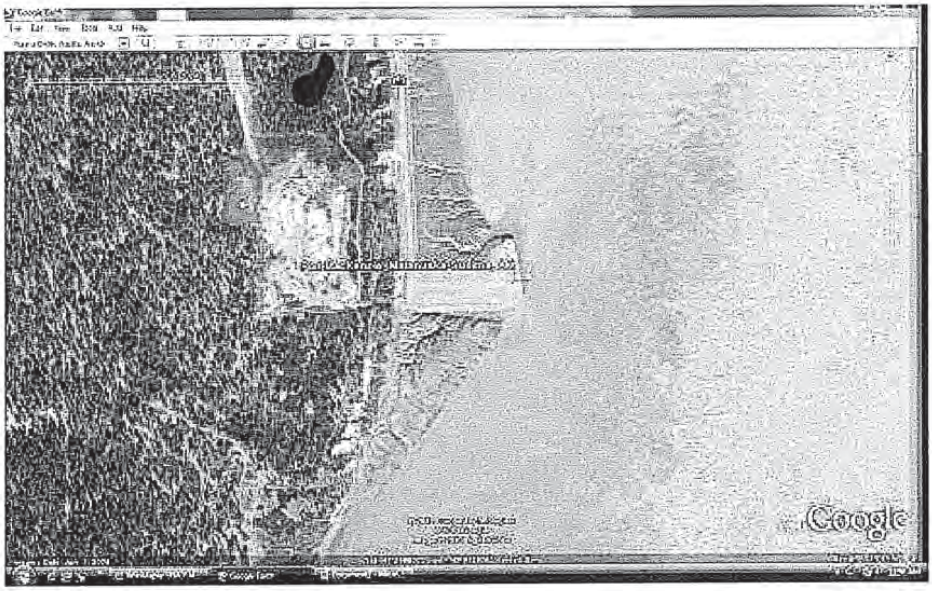


Figure 2 After barge dock - Noticeable change to shoreline

Comment Number: 58
(continued)

- A new shoal is building downstream of Port MacKenzie (called the Point MacKenzie shoal). Attached map show the area was stable prior to Port MacKenzie construction. First topo is USGS map July 1, 1963. Second is National Geographic map that is current as of 1988. Note that there are no changes in depth for 25 years.

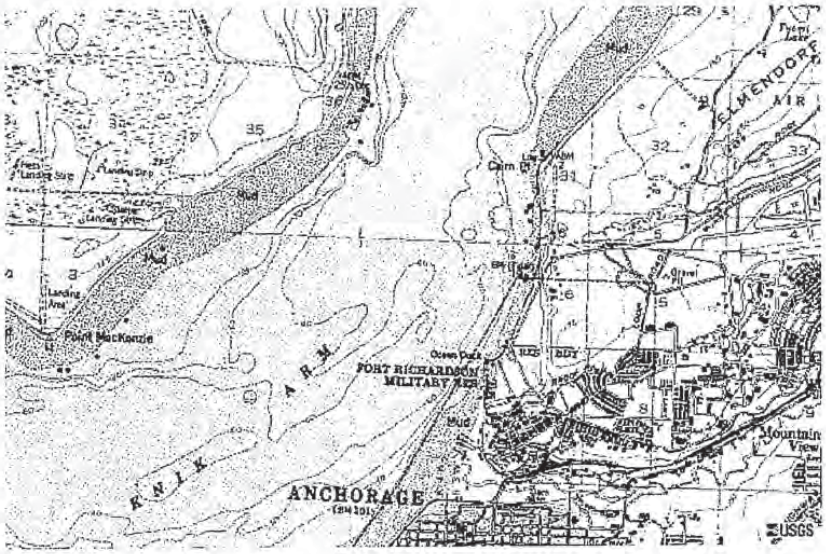


Figure 3 USGC map July 1, 1963

Comment Number: 58
(continued)

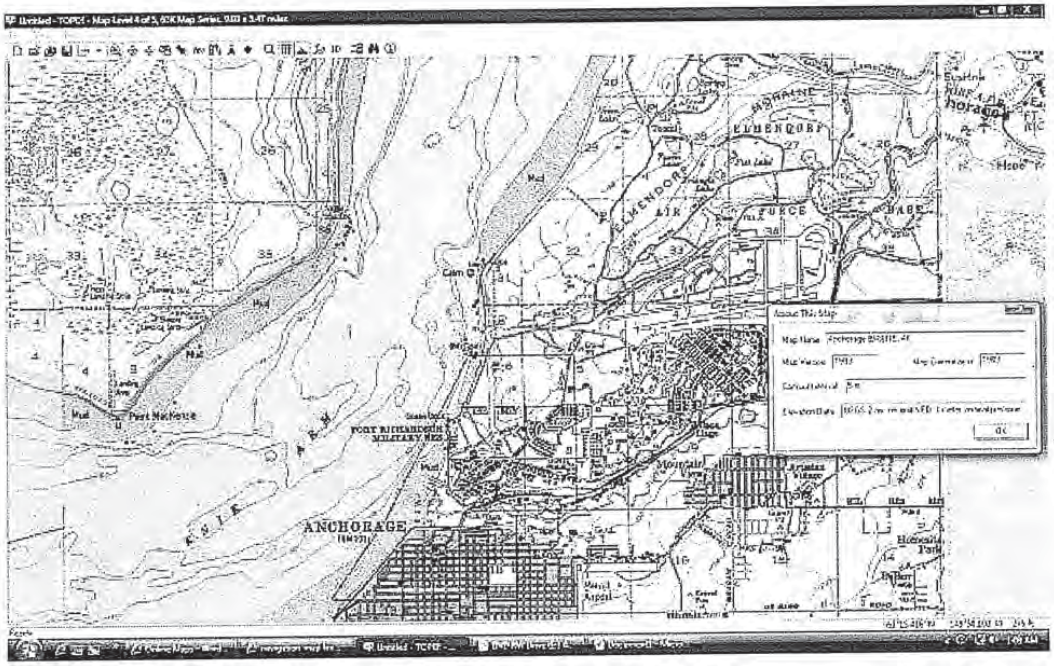


Figure 4 Map current as of 1988 shows no change to area in 25 years

- The new Point MacKenzie shoal is narrowing shipping lane as shown on this NOAA chartlet. Note that the 1992 line for 33 ft. has not change from 1963. Port MacKenzie started construction in 1999.

Comment Number: 58
(continued)

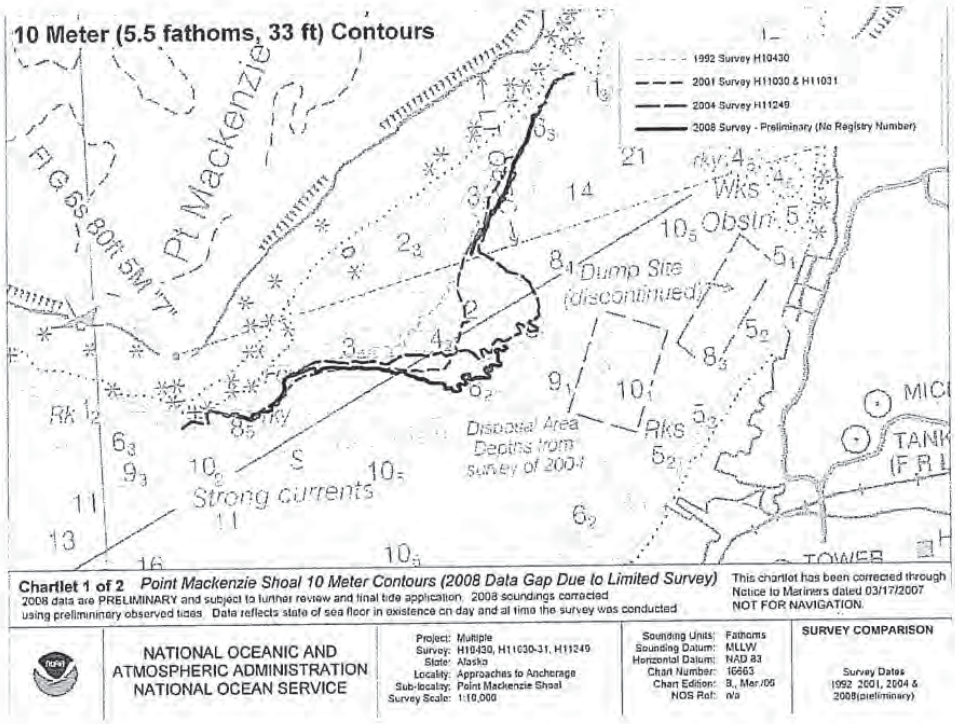


Figure 5 Note the steady growth of Point MacKenzie Shoal. The middle of Knik Arms is now as shallow as 6 feet where it used to be 60 ft.

- Ships entering either port must deviate from the navigation line and maneuver more than normally needed to safely approach the docks. Turning ships around has become increasingly dangerous due to the Point MacKenzie shoal, especially in wind or ice conditions.
- The U. S. Army Corps of Engineers needs $ 1 to $1.5 million as a 50% cost share to study the Point MacKenzie shoal and determine how much it will cost to dredge it annually.
- Port of Anchorage supplies 90% of all consumer goods to the State of Alaska. [2] Alaska's economy would suffer if access to the Port of Anchorage becomes more challenging as a result of continued growth of the Point MacKenzie shoal.
- Port of Anchorage is one of only 19 Ports designated by the Department of Defense[3] as a national strategic port. National Defense would be impacted if military supplies were shut off to the world's hot spots.

[2] The Economic Impact and Logistics of the Port of Anchorage

Comment Number: 58
(continued)

- We **must** do further study on the negative impact to the Knik Arms ecosystem and fish habitat. In the meeting notes of the KABATA Bridge Approach Design Option Agency Meeting #2 on August 26, 2005: "*Robin Reich (HDR) said:* "**When we look at fish around Port MacKenzie dock, we saw a fair amount of juvenile salmon. We caught fewer around the face than on the two sides. Phil Brna (USFWS) mentioned the fish may not be able to get around the dock.** That leads us to the abutment topic. We want to address concerns so we design to make it easier for fish to get around."

- The Matanuska-Susitna Borough is aware of all this but is still asking for an additional $57 million to expand the Port area facilities, even though they are aware of the high probability that Port MacKenzie has caused these damages. Simply physics say that further constriction of the narrowest point in the Knik Arm from future expansion of the Port will increase the speed of currents and can multiply the rate of sedimentation as described in the Knik Arms bridge study.

Port MacKenzie was built on a "Build it and They Will Come" "Pie in The Sky" Dream NOT on Economic Reality

- Port MacKenzie's mission *"To develop a world class Alaskan deep-water Port capable of safely and efficiently transporting people and commodities"*. The Port of Anchorage **is** a world class Alaskan deep-water port capable of safely and efficiently transporting people and commodities. Only 1.5 miles separate the two ports. Railroad service to Port MacKenzie will save only 26.4 miles, some reports say 35 miles.[4] It should be noted that the Alaska Railroad is only co-sponsoring the rail extension. They will sponsor the bonding but they will not put up Railroad assets for collateral. In a conversation with Steve Silverstein, Vice President, Business Development of Alaska Railroad, he states the cost of operating and maintaining the Port MacKenzie rail extension, based on actual conditions, would cost the railroad more to go to Port MacKenzie than it would cost to go to the Port of Anchorage. Any saving because of distance would be offset by the operations and maintenance costs of tracks, signals, etc and the fact that it is a dead end. He said the only way the rail extension would be cost effective over taking freight to Anchorage would be if a bridge with rail road tracks is built across the inlet or there is a substantially greater volume than we can identify at Port MacKenzie.

- Anchorage is a sheltered port that offers safety to moored ship. Port MacKenzie's master plan states ***"Once a ship has been docked in waters such as Cook Inlet, with its ice and fast currents, pilots require almost perfect dock alignment in order to hold ships in the moored position."*** [5] Per Van Dongen "The hardest part, most critical, is moving it while it's at dock. The ship will have to be moved 5 times in the course of loading its cargo. We have a heavy current there, we will use 24 lines to tie the vessel to the dock. There's a lot of force between the current and the ice.[6] In February 2005 the first ship to dock at Port MacKenzie had to leave because of dangerous ice conditions. The port of Anchorage encountered no ice problems.[7]

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[3] http://www.muni.org/departments/port/pages/default.aspx
[4] **Benefit-Cost Assessment of the Port MacKenzie Rail Extension**, page 6
[5] **Point MacKenzie Port Master Plan**, Amended May 1999, page 23
[6] Alaska Journal of Commerce, February 6, 2005, **Port MacKenzie's ship has come in** by Margaret Bauman
[7] Alaska Journal of Commerce, February 14, 2005, **Ice puts a kink in Port MacKenzie's first docking** by Margaret Bauman

Comment Number: 58
(continued)

- Port MacKenzie claims a deep-draft capability of -60' mllw. However this is misleading. The elevation of the Knik Arm Shoal is -37 feet mllw. All ships going to the Port of Anchorage or Port MacKenzie must cross this shoal. ***Port MacKenzie's Master Plan states "based on information presently available, in conjunction with tide and depth limitation, it appears that maximum loaded ship draft at the proposed port would be 40 to 42 feet."***[8]

- In the draft EIS for the proposed Port MacKenzie rail extension, Appendix H, Biological Assessment, Section H.1, page H-12, paragraph 1 states: *"Port MacKenzie facilities include a deep-draft dock that can be used on a year round basis. In winter months with heavy ice, additional tie-down lines and a stand-by barge are used when ships are broken from their moorings by ice movements."* This statement is a very accurate description of the challenges to using Port MacKenzie in winter months. For any shipper to have to plan for this level of emergency back up just to stay tied to a dock is a very expensive and risky undertaking.

- In the Draft EIS for the proposed Railroad Extension under Purpose and Need "*The Applicant notes that the Port of Anchorage currently has no capacity for dry bulk materials export.*" **In fact the Port of Anchorage handled 116,789 tons of dry bulk commodities in 2008.**[9]

- EIS states "*The required room for bulk rail unloading (unit train rail loop arrangements) does not exist, nor does the Port of Anchorage presently have the capacity to handle the loading of dry bulk materials into ship.*" **The proposed Port MacKenzie's rail line loop is up a 150 ft embankment. The rail loop proposed phase I area is currently 2 miles from the Port by steep road,** [10] **or will require 1800 ft of conveyor system. Existing conveyor system belongs to a private contractor who is in ongoing litigation with the Borough regarding use of this system. This means trains do not offload into the port area as we are led to believe. Additionally Port of Anchorage is currently handling dry bulk commodities import, why would they not be able to handle export. The Alaska Railroad owns an additional 600 acres of land on the west side of the Port of Anchorage, not two miles away as Port MacKenzie is. The rail road has a loop used for loading and unloading rail cars. They also rents/leases land to rail or port tenants.**

[8] **Point MacKenzie Port Master Plan,** Amended May 1999, page 22
[9] **2008 Port of Anchorage Annual Tonnage Report**
[10] RAIL EXTENSION PROJECT **Economic Benefits to the Central Alaska Regional Economy**

Comment Number: 58
(continued)

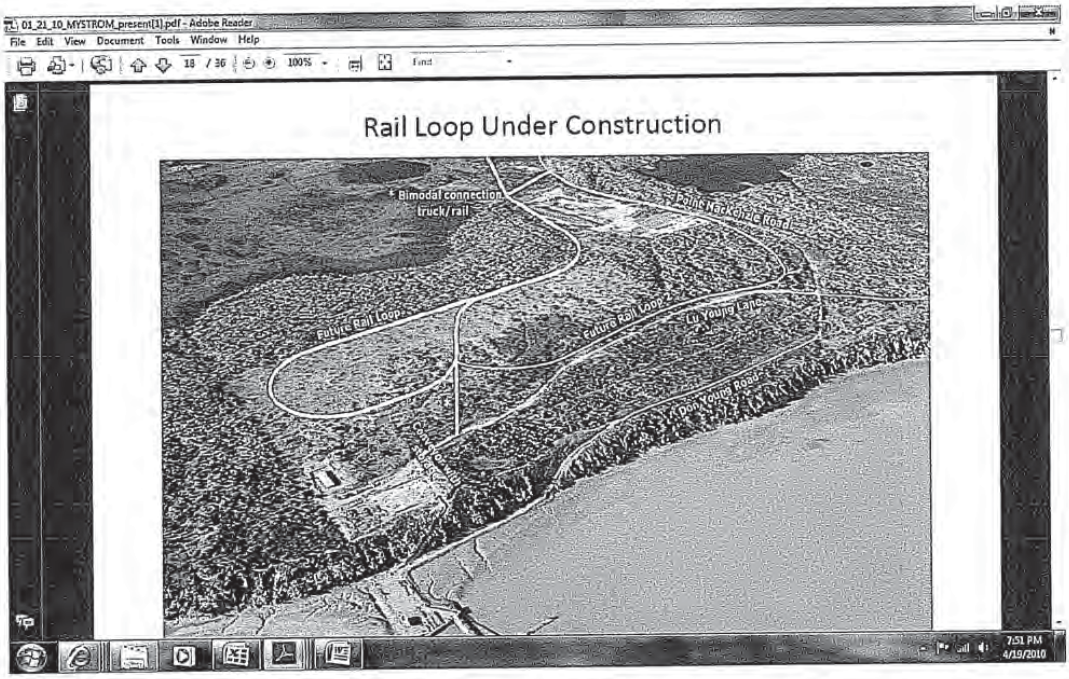

Figure 6 Proposed rail loop 2200 ft away (.4 miles) and over a 150 ft bluff

- Port MacKenzie claims they can handle coal. EIS for Chuitna Coal mine said that their Port area will have 56 pounds of coal dust an hour released into the area equaling 236.6 tons per year. [11] Will Anchorage residents ever allow permitting for coal shipping within 2 air miles of the City? Consider how coal dust from the Seward Port is affecting that town.

[11] **1990 Diamond Chuitna Coal Project Final Environmental Impact Statement**, Volume 1, Chapter 5, Environmental Consequences

Comment Number: 58
(continued)

Figure 7 Loading barge with gravel. Note closeness of Anchorage in background.

- As early as 1989 the Anchorage Daily News reported: *Bill Noll, Vice President of Suneel Alaska Corporation, informed the Anchorage Daily News that* ***the company long ago discarded the possibility of shipping coal from Upper Cook Inlet because of navigational hazards. "It's not the economics, it's the possibility of losing your ships,"*** *Noll said.* ***Coal ships draw 40 to 45 feet of water. To get to Point Mackenzie, they would have to pass over two shoals that are shallower than that****. Ed Murphy, President of the Southwest Alaska Pilots Association said* ***coal carriers would have trouble with Cook Inlet ice****, He said the ice has caused problems for Sealand and Totem Ocean Trailer Express ships this winter, and those ships are smaller, have more powerful engines, and are designed with sharper bows to cut through the ice. "Time is critical here." He said. "You've got to be able to get across the shoal at the critical time and to the other shoal before it gets to the critical depth, and in a round-bow, low-horsepower ship in the ice, that may be a problem."*[12]
- (October 1989) The Mat-Su voter rejected a $25 million bond for Port.[13]
- (November 1989) Anchorage Daily News reported: *Mat-Su Borough's Boston based consulting firm Temple, Baker & Sloane, Inc. describes the Point Mackenzie Port Project as "* ***a speculative investment whose long-term development potential is uncertain****" and suggests the borough "carefully consider the full range of alternative economic options available." Even* ***under the rosiest assumptions, the port***

[12] Anchorage Daily News, March 22, 1989, **Shallow Inlet Deters Shippers, Mat Su Officials Defend Port Plan** by Charles Wohlforth
[13] Mat-Su Borough Clerk's Office

Comment Number: 58
(continued)

would lose money for years *a total of $25 million through 1997, according to the report. After that, it would start to earn money, bringing in a total of $48 million over the next decade. That's if everything breaks in the borough's way: the proposed Wishbone Hill mine near Palmer goes into production and ships through Mackenzie, Healy coal now shipped through Seward is switched, and an export industry in Mat-Su logs and wood chips springs to life. Under the most pessimistic assumptions the consultants examined, the port would run in the red every year through 2004, losing $70 million. After that, it would make money for two years a total of about $17 million then shut down as Wishbone played out.* ***The report also notes that two thirds of the economic benefits in the port analysis could come to pass even without a port.*** [14]

- (February 1990) Anchorage Daily News reported: *"Study shows a port at Point Mackenzie probably doesn't make sense economically, and voters turned it down last fall, but the Matanuska Borough is still spending money to make sure it gets built.* ***Spending on the port appears to have created its own momentum. The Port Commission used borough money to have a consultant devise a plan to lobby the borough assembly for the port, and then tried to keep it secret."***

  Enthusiasm of port supporters persisted even though a $25 million port bond was turned down by voters. Port Commission Chairman Dan Dorran called the negative vote, "a victory," and some assembly members agreed, because they said voters were ill-educated on the issue and, thus, were likely to vote against it." But a borough funded survey of voters leaving the polls showed that impression was wrong. Marc Hellenthal, who conducted the poll, said only 3 percent of those who voted against the bonds said they didn't know enough about the issue. The vast majority said a port isn't needed, would lose too much money, was too expensive in light of other borough needs, or has not received enough study.

  Port supporters also tried to discredit the consultant's economic study which came out after the election. ***The commission dictated changes to the consultant, striking the statement that the port is a speculative and uncertain investment and leaving out tables that showed how long the port would lose money.*** *But even after the revisions, it is still difficult to find anything positive about the port in the study.* ***It says the port would require large subsidies to export even its most profitable commodities. Shipping 1 million tons a year of coal from Sutton's Wishbone Hill mine would require a subsidy of $4 to $5 a ton, the report said.*** *Despite that outlook, the commission had the consultant continue with the second phase of the contract, which was to write an action plan to sell the port.* [15]

- (January 1992 Alaska Journal of Commerce reported: *A quiet battle is being waged in the case of the proposed Port MacKenzie over a critical missing link, a railroad spur, over which millions of tons of natural resources could be moved to dock. On one side are port promoters who say they have all the economic facts and numbers needed, except those they need from Alaska Railroad Corp. to build that track. On the other side are railroad officials, who say they can't decide whether to support such a link, which they don't propose to finance until they get more facts on the economic feasibility of the port. .. Before lending support to about 30 miles of rail from Palmer to the proposed port on Upper* Cook Inlet,

[14] Anchorage Daily News, November 17, 1989, **Report Pans Mat Su port, but boosters vow to press on** by Stan Jones
[15] Anchorage Daily News, February 27, 1990, ***Backers Still Pull for Port in Valley*** by Charles Wohlforth

Comment Number: 58
(continued)

the railroad needs to know what revenues would be generated by the port, said Loren Lounsbury, chairman of the railroad board.[16]

- (April 1993) Alaska Journal of Commerce reported: *A subsidiary of Japan's Kobe Steel, Ltd. Is moving slowly in its considerations of a $200 million plant on Upper Cook Inlet, with a cautious eye to winter ice, seismic activity and gas prices. "We are assuming a positive decision internally on the viability of a North American project," says Frank Griscom, vice president of marketing for Midrex Corp., an engineering firm based in Charlotte, N.C.* ***"We would love to put a plant in, but we are not going to try to hoodwink anyone into building a plant that we believe can't live up to the economics, winter ice and seismic conditions,"*** *Griscom said in a telephone interview March 30.*[17]

- (September 2000) Anchorage Daily News Reported: *After attending the ribbon cutting ceremony for the new Port MacKenzie Dock, Mike Doogan of the Anchorage Daily News wrote; "I've seen artist's conceptions of Point Mackenzie before. There was the Knik Arm Crossing, an oft-conceived bridge or causeway, sometimes with tidal power generators, sometimes not, to connect Anchorage with its sketched-in bedroom community across the water. There was Seward's Success, a climate controlled city connected to Anchorage by a high-speed aerial tramway. The Point Mackenzie Dairy Project, part of Gov. Jay Hammond's ill fated green development scheme, actually leaped off the drawing boards, only to crash into a flaming mass of bankruptcies and finger-pointing.* ***For more than a generation, Point Mackenzie has been where big ideas go to die."*** *..... ""Dreams become a reality if you work hard enough to achieve them"", Mat-Su Borough Manager Mike Scott told the crowd, "and he might have added, if you can secure the public funding. Nearly $7 million in federal funds went into the dock and approach road, with another $1 million-plus in state and Borough funding. There's another $4.5 million in federal money to build a ferry landing...."*[18]

- (November 2000) Anchorage Daily News reported: *The U.S. Army Corps of Engineers, in a preliminary review of the Port Mackenzie dock, declares that the new port at Point Mackenzie may not be able to withstand an earthquake. At issue was the stability of several hundred 70 foot pilings that surround the dock. Driven into the Cook Inlet silt, the pilings create the framework for the dock, holding in place 350,000 cubic yards of gravel. "Only two of the three test holes drilled for the agency turned up a potentially weak layer", said Marc Van Dongen, Port Mackenzie's new Director, "and those two holes were 10 feet apart. So it could be just a localized problem." "State Department of Transportation officials originally requested the review because of concerns about* ***the stability of the gravel dock*** *and* ***lack of data about the silt underlying it"*** *Van Dongen said.*[19]

- (June, 2001) Alaska Journal of Commerce reported: *A shift in development priorities by the Mat-Su Borough administration has affected plans for Port Mackenzie. With the exception of one business, activity at the port has ground to a halt since the Corps of Engineers issued a preliminary report last fall,*

[16] Alaska Journal of Commerce, January 20, 1992, **Port MacKenzie promoters, railroad spar over spur** by Margaret Bauman
[17] Alaska Journal of Commerce, April 5, 1993, **AIDEA funds feasibility study for iron processing plant** by Margaret Bauman
[18] Anchorage Daily News, September 8, 2000, ***Point Mackenzie Proves Itself a Graveyard for Grand Schemes***, Mike Doogan
[19] Anchorage Daily News, November 25, 2000, ***New Dock May Be At Risk*** by S.J. Komarnitsky

Comment Number: 58
(continued)

alleging that the port may not be structurally sound. Shortly after that, the Federal Highway Administration issued a recommendation that the port close until the Corps and the borough come up with a plan to make appropriate repairs... There is one tenant at the port, Alaska Manufacturing Contractors. The company began manufacturing homes for villages in rural Alaska last year, completing 11 homes and then shipping them from Port MacKenzie. The company managed to do this despite a lack of basic infrastructure at the port. Plant manager Bob Gilman said his company has met all its contractual obligations as a tenant, and he hopes the borough will be able to reciprocate. "We expect a certain amount of growing pains," Gilman said. "We've managed to accomplish every single thing we said we were going to ***do 2 ½ years ago****, and we fully expect that the Mat-Su borough will accomplish their goals also, including road improvements, permanent power and other infrastructure for the port here."* ***Right now there is no electricity, no gas and no real infrastructure to attract and keep port tenants.***[20]

- (November 2001) Anchorage Daily News reported: *When Mat-Su Borough built a port at Point Mackenzie in 1999, borough administrators pitched it as a small-scale operation that would pay for itself and grow as needed. Fees from a ferry service and shipments of Mat-Su timber would pay the bills, then borough Manager Mike Scott pledged. But as Port Mackenzie prepares for its third season, the self-supporting part of the operation has yet to pan out.*

  The port, ***which cost about $7 million, has generated less than $20,000 in revenue****, according to the borough's port director. It has one permanent customer. There are questions about the dock's stability in an earthquake, and borough officials say much more money --millions more--needs to be spent to create an economically viable port. Borough officials stop short of saying the initial plans for the port were unrealistic, but they now talk about it as a long-term project that will take years to pay off. Meanwhile, the borough faces questions about the stability of the dock. The U.S. Army Corps of Engineers started a review last year after cracks appeared in the gravel on the top of the dock. In February, an engineer with the corps said the dock could be failing already.* [21]

- **(August 2003)** Anchorage Daily News reported: *The Matanuska-Susitna Borough wants to team up with a timber firm to build a bigger dock at its Point Mackenzie port in hopes of attracting more business. But some Assembly members are questioning the proposal,* ***which could end up costing borough taxpayers up to $10 million and requires putting up the borough office in Palmer and the land it sits on as collateral.*** *The Assembly members and Borough Mayor Tim Anderson say they want more information about the timber company NPI LLC.*

  They are concerned that taxpayers could end up footing the bill, although officials say they are optimistic the state would reimburse the borough for the cost of the project. ***Since the project would give NPI exclusive rights to ship some products, including gravel and wood chips****, it might discourage other*

[20] Alaska Journal of Commerce, June 10, 2001, ***With Port Mackenzie Closed, Mat-Su Borough Shifts Director's Responsibilities***, Chas St. George
[21] Anchorage Daily News, November 5, 2001, ***Knik Arm Dock Has Yet to Pay for Itself*** byes'. Komarnitsky, .

Comment Number: 58
(continued)

businesses from setting up at the port some members say. "I have a whole lot of questions and no answers," said Assembly Member Mary Kvalheim. The proposal comes as the borough is struggling to find a niche for the port. The facility opened in 1999 with great fanfare but so far has only one permanent customer--a business that builds prefabricated homes and ships them to the bush.

A recent study done for the borough suggested the port might have trouble living up to its supporters' expectations without a big change in the political and economic landscape, such as construction of a natural gas pipeline to the port. The study by The Cornell Group, Inc. states that without such a development, "Port Mackenzie may be relegated to the position of a marginal port supporting the Port of Anchorage for the next 20 years."

Under the proposal, both sides would pitch in to pay for the estimated $11.5 million extension, which would add 485 feet to the current 850 foot dock. ***The borough would pay up to $10 million for construction while the timber company would contribute $3 million and build an $8 million conveyor and loading system to transfer material, such as gravel and wood chips, onto waiting barges.*** *The borough would issue revenue bonds to pay for its share and is hoping the state will reimburse those costs, Borough Manager John Duffy said. But that is not guaranteed.*

The Legislature passed a law last year that authorizes reimbursement to the borough of up to $10 million for the dock extension. However, the Legislature has to approve those payments each year and could decide not to if state budget problems persist. Legislators have already turned down money authorized for other projects in the same bill. ***If the state doesn't come through, Duffy said he's hopeful the fees the borough would charge for shipping products, particularly gravel, would cover the bond debt for extending the dock. But he acknowledged that taxpayers could be left footing the bill if the state funding falls through and revenues from the new port do not materialize. He said it is unlikely that borough officials would give up the borough building. Instead, the Assembly would raise property taxes, he said.***

Because the borough is putting up its office building as collateral, bonding for the dock extension would not require voter approval *as is typical for funding such projects as school construction, Duffy said. The difference is the borough usually backs its bonds with a promise to raise taxes if needed to cover costs, that promise requires voter approval. In this case, the guarantee is the borough building. Mayor Anderson said he'd prefer a vote since taxpayers may end up paying for the project. "I'm really concerned with the borough getting stuck with the debt repayment every year," he said.* [22]

- (August 2004) Anchorage Daily News reported: *For a decade, a port at Point Mackenzie across Knik Arm from Anchorage was a dream and piles of paper in the Mat-Su Borough's Mayor's office. Now workers are driving steel pilings into the silty floor of Cook Inlet, building a dock deep enough for ocean going vessels. Mat-Su officials hope the $13 million project will bring jobs, cash and momentum for other big development dreams: a ferry, a bridge and railroad access to the Mat-Su port.*

[22] Anchorage Daily News, August 14, 2003, ***Valley Weighs Bigger Dock*** by S.J. Komarnitsky

Comment Number: 58
(continued)

The multimillion-dollar project is an expansion of a smaller $7 million dock the borough built at Point Mackenzie 5 years ago. Later the borough spent $800,000 to bring it up to safety standards. Much of the capital improvements have been funded by federal and state money. ***The borough spends about $250,000 a year for the port director and port planning. So far the first dock has one long-term customer and is generating about $20,000 to $30,000 a year, said Borough Manager John Duffy.***[23]

- (November 2004) Alaska Journal of Commerce reported: *A deep-draft dock under construction at Port Mackenzie since July is near completion, and, weather permitting, the first load of about 40,000 tons of wood chips should move out of the port in January, Port Director Marc Van Dongen said Nov 4. "Each one of those ships will probably generate about $50,000 in wharfage and dock fees. They're looking at a ship a month, so that would be $600,000 a year in borough revenues just for the wood chips. But the real benefit will be 120 new jobs, driving trucks and cutting timber. Given the multiplier effect of those dollars turned over and over in the local economy, the desired effect of generating economic development will be realized. The port will provide alternative revenue to the borough assembly to use as they see fit."*

  To date, the borough has spent some $22 million on the port project, with most funds coming from federal and state grants, Van Dongen said. In addition, NPI is putting in about $11 million this year just to get it up and running. We've got a public/private partnership going. This time next year this will be more than self-supporting.[24]

- (January 2005) Alaska Daily News reported: *The first shipment of birch chips leaving Point Mackenzie via the newly built deepwater dock is set to be loaded this week onto the Keoyang Majesty bound for Korea. The shipment has been four years in the planning, said Terry Nininger, manager of NPI LLC, a wood chip manufacturing and export company. The initial wood shipment represents a shift in economics at the port, and 10 to 12 vessels are expected through the facility this year, netting the Borough about $600,000. "We won't be tapping the taxpayers to support the port at all" said Port Director Marc Van Dongen. NPI has put more than $11 million into the deep-dock project.*[25]

- (February 2005) Alaska Journal of Commerce reported: *A spokesman for a wood chip manufacturing firm said Feb. 7 his company is considering blocking out several weeks in mid-winter as shipping dates in the wake of icy conditions at Port Mackenzie that prompted a ship to depart with half its cargo loaded. ..* ***Several days after arrival, with three of six compartments loaded, the captain became alarmed at mounting ice conditions and decided to bring the vessel back to Homer to wait until conditions improved... Officials at the Port of Anchorage said ice conditions caused no delays at that port. "Port Mackenzie lies at a narrower point of Upper Cook Inlet than the Port of Anchorage, and is subject to faster currents, which contribute to ice problems in winter"****, Van Dongen said... "Port Mackenzie was*

[23] Anchorage Daily News, August 5, 2004, ***Work is Now Under Way on $13 Million Port Mackenzie Project by*** Sarana Schell
[24] Alaska Journal of Commerce, November 14, 2004, ***Deep Draft Dock at Port Mackenzie Nears Completion*** by Margret Bauman

[25] Anchorage Daily News, January 31, 2005, ***First Ship to Tie Up at Mackenzie Dock*** by Rindi White

Comment Number: 58
(continued)

planned to operate year-round, but everyone is aware of the ice... ***Van Dongen said ice conditions are a chance vessel captain's take bringing ships into the area in the winter".***

Port officials have heralded the arrival of the huge Korean vessel as a major step forward for the port. Matanuska-Susitna Borough manager John Duffy has estimated port fees from wood chip vessels alone would bring in $80,000 to $100,000 annually to borough coffers.[26]

- (April 2005) Anchorage Daily News reported: *A so – far smooth relationship between the Mat-Su Borough and NPI, LLC, the sole business shipping from the borough dock at Port Mackenzie, has hit a contractual snag. NPI's contract to operate at the port is on the line after borough officials said the company failed to make payments it should have made more than a month ago. The borough claims NPI owes more than $66,000 in wharfage fees based on tons of material handled at the Port Mackenzie dock. An NPI contract to clear 900 acres of borough timber is also on hold until the dispute is settled.*

  NPI issued its own notice of default to the borough Tuesday, ***contending the borough improperly changed the dock design without the company's approval. The changes have cost NPI a customer,*** *according to a letter to the borough from Dale Rich, President of Oklahoma based Horizon Natural Resources Inc., the NPI LLC parent company....****Because of these changes made by the Mat-Su Borough, certain shipping companies have now deemed Port Mackenzie unsafe for berthing," Rich wrote. "Therefore, we have lost our customer."*** *NPI spokesman Terry Nininger said that one NPI client voiced concerns about shipping from the dock during winter months.*[27]

- (November 2005) Alaska Daily News reported: *Matanuska-Susitna Borough officials want to know if a bridge across the Knik Arm at Anchorage would trigger the collapse of the borough-owned dock at Port Mackenzie. Borough officials have been concerned about the dock ever since a federal study two years ago showed building the span could increase the flow of water near the port. Earlier this month, Borough Manager John Duffy wrote the U.S. Army Corps of Engineers citing the "potential catastrophic collapse" of the dock. He noted a 2003 model exercise by the agency showed that the span could trigger a "significant increase' in water velocities near the port.*

  Duffy wanted to know whether the Corps of Engineers reviewed that study and what they found. The answer wasn't what Duffy hoped. The agency doesn't expect a copy of the study until next week, and it will likely take weeks for a thorough review, said Steve Boardman, who oversees the Corps of Engineers civil project branch in Alaska. Borough concerns about the bridge impact on its dock date back to a 2003 study by the Corps of Engineers at its offices in Vicksburg, Mississippi. That study simulated conditions in Knik Arm. It highlighted a number of potential problems with the span, including faster currents in parts of Knik Arm and possibly more sedimentation near the Port of Anchorage. The latter is a concern

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[26] Alaska Journal of Commerce, February 14, 2005, ***Ice Puts a Kink in Port Mackenzie's First Docking***, by Margret Bauman

[27] : Anchorage Daily News ,April 21, 2005, ***Dock Arrangement Hits Rocks*** by Rindi White

Comment Number: 58
(continued)

because the port already spends millions a year dredging to keep the channel clear for ships. The faster currents could also make navigating Knik Arm trickier for ships, Boardman said. [28]

- (January 2006) Alaska Journal of Commerce reported: *The Mat-Su Borough's Port Mackenzie earned **$217,000 in 2005 in wharfage and dockage fees** from several large cargo vessels and barges, **just a fraction of the port's fiscal operating budget for fiscal 2006**, borough officials said December 20. According to Cheyenne Heindel, the borough's revenue and budget manager, the port has an operating budget of $2.7 million for fiscal 2006, including $178,536 in wages and benefits for the port's two employees. Until July 1, 2005, port funds came from an area wide operations fund, Heindel said. As of July 1, the borough transferred all port assets – a total of $27.5 million – to a separate port enterprise fund. **That fund has already paid out $410,000 in interest charges on a $10 million bond for port construction approved in a borough election several years ago,** Heindel said.*[29]

- (January 2006) Anchorage Daily News Reported: *The borough has long hoped to see its port become an economic engine in the Valley, and Director Marc Van Dongen has found encouragement in a newcomer – a company that views the dock as a potential terminal for offloading imported cement. Van Dongen wouldn't identify the company but the business interest may be a sign of things to come as operation of a new Point Mackenzie ferry draws closer and a potential Knik Arm Bridge looms in the background. **At least 40 companies have talked to Van Dongen about doing business at the port in the past three years,** he said.*[30]

- (January 2006) Anchorage Daily News reports: *A $3.3 million ferry terminal will be built at the Port Mackenzie dock this year, but it will be at least two years before ferry service begins, port director Marc Van Dongen said Monday. Robert Koski, Port Mackenzie project manager for the borough, said he expects the terminal building to be finished in November. Paid with federal funds, the terminal building is one of three large projects that must be completed before ferry service between Mat-Su and Anchorage can begin. In line for completion next year, Koski said, is a project to build ferry landings at Port Mackenzie and in Anchorage. A small terminal building, where ferry tickets can be purchased, is also slated for construction next year in Anchorage.*

  While ferry landings are built, the catamaran-style ferry will be built in Ketchikan, Van Dongen and Koski said. Van Dongen said the ferry will take 18 months to build. Koski said that if the ferry project stays on track, the ship will be put through a testing regimen in late 2007. Van Dongen said delivery to the Mat-Su Borough is set for spring 2008. The ferry is expected to cost nearly $30 million.[31]

- (June 2007) Anchorage Daily News reports: *A timber company that partnered with the Mat-Su Borough in 2003 to build a $14 million deep-water dock at Port Mackenzie is now suing the borough for more*

[28] Anchorage Daily News, November 23, 2005, ***Effects of Bridge on Port Concern Officials*** *by* S. J. Komarmitsky

[29] Alaska Journal of Commerce, January 1, 2006, ***Costs Outpacing Revenues As Port Mackenzie Develops by*** Margret Bauman

[30] Anchorage Daily News, January 4, 2006, ***Scores of Companies Eye Port Mackenzie*** by Kyle Hopkins

[31] Anchorage Daily News, January 25, 2006, ***Ferry Terminal First Stage*** by Rindi White

Comment Number: 58
(continued)

*than $100,000 in damages. NPI, LLC filed the suit last month in Palmer Superior Court accusing the borough of breaches of "good faith' and "fair dealing". **Specifically the suit claims the borough was unfair in "denials of Lease Credits to NPI, Interference with NPI's priority use rights (at the dock), and interference with NPI's timely recoupment of costs associated with developing the bulk material loading facility at Point Mackenzie."***

The company also contributed $3 million toward construction of a $14 million dock extension and paid $8 million to build a bulk material loading facility. The facility allows transferring items like gravel and wood chips onto barges. In exchange, the borough gave the company exclusive rights to ship bulk commodities, such as wood chips, out of the port. The company has had a running dispute with the borough about being able to deduct work such as road improvements at the port from lease payments it makes on its land.

More recently, company officials have complained a borough moratorium on timber sales has made it difficult for the company to get timber for export to its markets in Asia. The borough put a moratorium in place after complaints from residents about noise and traffic from timber harvesting operations.[32]

- (February 2008) Anchorage Daily News reports: *It's possible that unexploded 90 mm and 120 mm artillery shells are nestled amid wetlands, meadows and forests within an 8,657 –acre wedge on Point Mackenzie, according to the U.S. Army Corps of Engineers. Because of that, the Mat-Su Borough Assembly next month will consider whether to pay a contractor $148,775 to survey 20 acres the borough owns and that Alaska Aggregate Products plans to mine next year. "The odds of anyone finding something are really remote – extremely remote. But they do exist," said Port Director Marc Van Dongen. Van Dongen said he served 24 years in the Corps of Engineers, including six as deputy commander before retiring and becoming the borough port director.*

  According to the November Report, the former Susitna Gunnery Range is a fan-shaped area that extends from Cairn Point on Elmendorf Air Force Base to the Little Susitna River, about 17 miles. It was used between 1952 and 1958 as an impact area for anti-aircraft artillery troops firing long-range weapons. The military issued a certificate of clearance in 1960 that said all ammunition fired in the area had self detonating fuses and, according to the report, "there was no evidence of malfunction". But the report, citing military archives, said that 90 mm armor-piercing shells, 90 mm high-explosive shells and 120 mm high-explosive shells may still be there.

  Today the area includes the borough's barge and deep-water port, several farms, a few homesteads and recreational cabins. A landowner clearing land in August 2000 with a bulldozer discovered a 105 mm high-explosive projectile, according to the report. A second shell, a 90 mm armor piercing tracer, was also found when Alaska Manufacturing plant was built near the port in the late 1990's. And, according

[32] Anchorage Daily News, Dock Financial ***Dispute leads to Lawsuit***, S. J. Komarnitsky, 6-13-2007)

Comment Number: 58
(continued)

to the report, a detonation team member recalled in a 2005 interview responding to the area twice in the 1970's and 1980's to recover two "dud" artillery shells.[33]

[33] Anchorage Daily News, February 21, 2008, ***Old Munitions May Slow Gravel Mining*** by Rindi White

Comment Number: 59

mgwhedbee@aol.com
05/11/2010 01:25 AM

To naveckyd@stb.dot.gov
cc
bcc
Subject Port Mac Extension, STB Finance Docket 35095

Mike Whedbee
P. O. Box 520045
Big Lake, Alaska 99652

May 10, 2010
David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington, DC 20423
REFERENCE: Rail Extension
Dear Sir:
In the summary section you say that FRA may give grant(s) to build the railroad extension. Isn't there an OMB regulation that you may not give government funds through grants appropriations or assistance to any applicant that is harming or may cause harm to another federally funded project?

No federal dollars may be spent on Port MacKenzie or the Railroad extension to support the Port until they have been cleared of being a contributing factors to the damages to the Knik Arms shoal and the main factor in the Port MacKenzie Shoal that are causing navigational difficulties at the Port of Anchorage which is a Federally Funded project and one of only 17 strategic military defense ports. In addition the Port of Anchorage is in the process of an expansion at a cost of $527 million which is 52% Federally Funded.

By supporting this railroad extension, you will be contributing to the physical and economic damage to a federally funded project. As you are aware, the Alaska Railroad is exempt from the NEPA process of 4(f). Therefore once Federal dollars are removed, all 4(f) should be removed from the equation.

If you want to help the Alaskan Economy, this is not the way. The main reason our commodities are so expensive is because the ship go back empty. We are paying for a round trip for all ships but only getting service for one way. If you have one port for imports and another for exports, you will continue to have high cost as you are not addressing the main cause of higher prices. To help the economy we need one port to do both imports and exports. The Port of Anchorage has the ability to do both imports and exports for the next 20 years. Before that Port will be outgrown, we should have the Knik Bridge and hopefully a rail extension as part of the project. Port MacKenzie is a costly boondoggle that never had a

Comment Number: 59
(continued)

chance to succeed.

Everything in the need and purpose statement, furnished by the applicant, is inaccurate. 1) After 9 years the port has no new identified customers. If these customers existed, why have they have not contacted the Port of Anchorage. The Alaska Railroad will negotiate good rates to volume customers and have stated that unless there is substantially more business than they can currently identify, it will cost less to go to Anchorage than Port MacKenzie. 2) Knik Arm Shoal is the primary depth-limiting hazard to navigation in this area, not the depth at the port. 3) the port claims to be year round but according to a lawsuit filed by NPI, a partner in the Port development, the port design is not safe in winter. 3) port claims to be dredge free, however the Knik Arm Crossing study shows a high rate of sedimentation at the deep water port area. 4) Port of Anchorage does have the capacity to handle dry bulk commodities, and currently has a double rail line.

Cost Benefit Assessment (CBA), Even if the Cook Inlet navigation channel could handle the size ships necessary for heavy mineral transport, such as coal and limestone, all economic forecast are inaccurate. They are based on a dollar amount per ton mile as thought tariffs were figured on ton mile. Alaska Railroad under regulations of the Surface Transportation Board charges tariffs based on actual operating and maintenance costs for each section of the line. An example is that coal from the Healy mines listed tariff cost is 12.616 cents a ton/mile to Fairbanks but cost 10.47 cents a ton/mile to Seward. There is no way that any projections can be based on 6 cents a ton/mile as reflected in the CBA (Cost Benefits Analysis). No consideration was given to the fact that the 35 to 43 miles, based on which route is chosen from the existing rail line to Port MacKenzie, is a dead end.

When we asked the Alaska Railroad how much it would cost to go to Port MacKenzie, we was told that they had done the study but the actual cost of operations and maintenance is proprietary and they could not tell us, however, he did say that it will cost more to go to Port MacKenzie than it would to go to Anchorage and in some cases more than going to Seward. The information on costs was given to the Borough.
Economic Analysis of Federal Regulations Under EO 12866, January 11, 1996 states: "Analysis of the risks, benefits, and costs associated with regulation **must be guided by the principles of full disclosure and transparency**... and ... Special challenges arise in evaluating the results of an EA that relies strongly upon proprietary data or analyses whose disclosure is limited by confidentiality agreements. In some cases, such data and analysis may be the best, or even the only, means to address an important aspect of a proposed regulation. Nevertheless, given the difficulties that this confidentiality presents to OMB review and meaningful public participation in the rulemaking**, agencies should exercise great care in relying strongly upon proprietary material in developing an EA**. When such material is used, it is essential that agencies provide as much information as possible concerning the underlying scientific, technological, behavioral, and valuation assumptions and conclusions. This can be accomplished, for example, by providing information about the values of key input parameters used in a modeling analysis or the implied behavioral response rates derived from sensitivity analysis." This was not the way they handled the EA therefore **making this EA invalid and it should not be used**.

Comment Number: 59
(continued)

Based on this information you should issue a finding for the NO BUILD OPTION.
If you do not make this finding, then I have to encourage you to look at all facts. You will note that the only logical option is the Willow route. When taken as a system from the interior of Alaska, it is shorter, has the lowest possible train energy, the best safety factor, the best soil (all glacial moraine), and the least disruption of lifestyles of the residents of the valley.
The EIS does not adequately address the human element on the various routes. Very little has been done on the impact to people and their property values. Less than 2% of Alaska is owned by private individuals. Why has private ownership been given so little priority and the parks which cover the vast majority of land been given so much priority?
Alaska's Department of Natural Resources is mandated to work with transportation department when it is in the best economic interest of the State. The precedent has been set many times for property exchange or lot line readjustments. The DNR's findings indicate a strong influence from the Borough management who are trying to rush the rail extension through at the lowest possible price with little or no regards for Alaska's economic future. An example of this is the fact that it has recently come to light that the Mac East and the Mac West routes are not the best route. The agricultural land has a railroad easement that was set up in 1941. This route has not been studies due to the Boroughs rush to push the cheapest route through and poor to no planning for Alaska's economic future.
In Chapter 9 "Noise Element" You treat the noise as thought the trains will be moving during the day. Alaska Railroad moves passenger trains during the day and freight trains at night. The rail extension is specified as a high speed freight line. You need to redo the noise and vibration study to reflect the impact of the high speed 100 ton ore car moving over the rails during the night. It is my understanding that the impact is 10 times greater at night.
In summary, the railroad extension was an effort to save Agrium and was put together in haste. Agrium did not work out, but the Borough did not go back and do the required and necessary planning but has continued on with the project that is not in the best interest of anyone but the Borough. It is not in the best interest of the Borough resident, the State of Alaska's economy or the Alaska Railroad who will not benefit from the excessive train energy costs, the safety factors that are almost double the better route and the cost of operations and maintenance. Alaska will still have to put in a transportation and utilities corridor, probably along the Willow route which will mean paying for right of ways twice. All in all this is bad politics. Please make your findings in favor of the Alaskan people. Make a "NO BUILDING" recommendation.
Sincerely yours,

Mike Whedbee

Comment Number: 60

mgwhedbee@aol.com
05/11/2010 01:47 AM

To naveckyd@stb.dot.gov
cc
bcc
Subject STB Financial Docket 35095

Grace Whedbee
P. O. Box 520045
Big Lake, Alaska 99652

May 10, 2010
David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington, DC 20423
REFERENCE: Port MacKenzie Rail Extension
Dear Sir:
Thank you for this opportunity to express my views.
Point MacKenzie was first studied by the Borough in 1978 as a port. Many studies were done to determine the economic potential of the port. In 1993 the Borough Assembly adopted the Point MacKenzie Area Which Merits Special Attention Plan. In this plan the long- term roadway access alternative crossed the Little Susitna River and extended north to the Willow area. Since that time there have been numerous studies, transportation plans, master plans and design studies done by the Matsu Borough, the Alaska Railroad and the Knik Arm Crossing (KABATA). Virtually all studies discussed the long range plan of a rail corridor north of Willow. . In June, 2003 the corridor study results were published with the Willow Route approved by the Assembly.
The Mat-Su Comprehensive Economic Development Strategy (June 2006 Update) formally adopted by the Assembly and the Mat-Su Borough Long-Range Transportation Plan all support this route because of 20 years of exhaustive study. Until January 2008, Alaska Statewide Transportation Plan stated that the line connecting the Port and the Alaska Railroad would connect at Willow.
In a letter from Bruce Carr of Alaska Railroad to Tryck Nyman Hayes dated 12/11/02, the railroad officially endorsed the Willow route. The reason stated are just as valid today as when the letter was written.

> ***The Alaska Railroad (ARR) supports the newly defined Corridor 3. It is the only corridor which now fulfills the appropriate purpose of a rail link to the port: to move natural resource into and out of the port with a minimum of disruption to current and projected transportation corridors servicing economic development in the Pt MacKenzie area.***
>
> • The letter said that all the other corridors still end up in the immediate Wasilla area.

Comment Number: 60

- The railroad stated that the market is from the north.
- All other corridors will force ARR to bring all trains through the growing Nancy Lake Wasilla area before gaining the Pt. MacKenzie spur.
- ARR is facing re-alignment in Wasilla area now to foster a better economic development environment. ("ARR has no desire to try and re-align another spur in the next twenty years which is likely to happen with the other corridors")
- Corridor 3 appears to be favored by the public
- It appears ownership concerns are less of an obstacle
- Geography/geology appears to favor this route more
- Corridor 3 places the connection far north of Wasilla.
- Corridor 3 has the added benefit of appearing to align with the Knik Arm Crossing more favorably as a transportation link from Anchorage to Fairbanks.

The latest study presented to the STB has been slanted to make it appear that there is more public support for the Houston South route. That there has been some great changes that has made less ownership concerns and less geographic and geological concerns. I am sure that your study will show that this route has not changed. The wetlands have not dried up, the soil has not improved, the earthquake fault is still active, the connectors at Big Lake, Houston South and Houston North are still in the fastest growing area in the State of Alaska, and more homes and quality of life will be affected should any of these routes be chosen.

The intent of the rail spur was to open up the interior of Alaska. We currently have a railroad to Fairbanks but it was installed in the early 1900's and even with upgrades, is not up to the 60 miles an hour specifications. In order to utilize the old line for a high speed train, there must be major improvements made. When all the calculations have been made on this project, this seems to be overlooked. To compare apples to apples, we must look at a route from Port MacKenzie to the exact same point on the current line. This means that we must look at the old rail line from each connector to the Willow connector. It stands to reason that there will be numerous environmental issues to be handled. The proposed high speed train must travel 18.6 miles on old track from the proposed Big Lake connector to the Willow connector, 14.9 miles from Houston South and 9.2 miles from Houston North. The scope of this study must look at the environmental and socio-economic impact on that portion of the existing railroad from each connector to the farthest North connector in Willow for a FAIR AND BALANCED COMPARISON.

Port MacKenzie to Willow Connector is 44.8 miles long, The Houston North to Willow Connector is 44.3 miles long, Houston South is 49.4 miles long and Big Lake is 54.4 miles long. This means that trains to the interior must travel and additional 4.6 miles on the Houston South corridor and 9.6 miles on the Big Lake corridor, a total of 110% further for Houston South and 121% further for the Big Lake Corridor than the Willow Corridor.

Per the study done for the Borough by Shannon & Wilson, Inc. dated October 26, 2007, if the current rail line was up to a 60 MPH specification, train energy used to go from Port MacKenzie to the Willow connector by each of the corridors shows the Willow Route saves the most train energy. Using the Mac East examples, the Willow route will save total train energy over the other routes from 5.4% (Houston North) to 16.5% (Houston South) and 26.2% (Big Lake). The Mac West example demonstrates the Willow route will save 6.1%, 17.7% and 43.6%

Comment Number: 60

respectively. The additional capital expense of the shorter Willow route should be repaid through the substantially lower operating costs in a relatively short timeframe. This means the railroad will realize higher net returns and less operating cost (fewer lines to maintain and a shorter travel time for less personnel expense).
The only thing that has changed since the original study in 1978 is that Borough management has put a lot of pressure on the DNR to make 4(f) requirement on all but the cheapest route to build. This is contrary to the purpose statement of the DNR. Over 98% of all land in the great State of Alaska is owned by the governmental agencies and native corporations. There are many precedents where DNR has made property trades or lot line readjustment when it is in the best interest of the Alaskan economy. Even though you have letters from the DNR of no de-minimus, this should not be the last word. Common sense should come to play in this decision. Private property ownership in Alaska is the minority and should be protected.
The Willow Route makes the most economic sense, therefore we urge you to choose the Willow Route or the "No-Build" option.
Sincerely yours,

Grace Whedbee

Comment Number: 61

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05/11/2010 02:37 AM

To naveckyd@stb.dot.gov
cc
bcc
Subject STB Finance Docket No 35095

Mike Whedbee
P. O. Box 520045
Big Lake, Alaska 99652

May 10, 2010
David Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street, SW
Washington, DC 20423
REFERENCE: 4 (f) requirements
Dear Sir:
The current EIS has made it almost impossible for you to chose any route other than Houston South or the Big Lake alternatives because of the unreasonableness of the Alaska Department of Natural Resources (DNR). There are numerous examples of the DNR allowing use of the parks when it is in Alaska's economic best interest. This finding of no de-minimus is not in keeping with the normal procedures of the park system and speaks to the un-do influence of the Mat-Su Borough Management. Every property of DNR's has long range goals which allow for roads, foresting, mining, hunting, fishing, trails and other activities for the benefit of Alaskans. This railroad falls into the classification of economic benefit for all Alaskans, but must have the proper mitigation measures to protect the public land. The NEPA process and the multitude of government agencies were developed with the intent to provide this protection.
The NEPA process for 4 (f) states that you may use a route that has a no de-minimus when it is not feasible or prudent to use other routes. All routes are feasible although we still need to look at what cost we will pay, not only monetarily but to the environment, the lifestyle of people, train safety, train energy, loss of wetlands, dissecting watershed and recreational trails and the total disregard to the wishes of the majority of the people who live in the area. You have been presented with 1172 signatures of local residents who want the only reasonable route to be used, the Willow Route.
What prudent person would chose any route other than the one that has been proven to be the best, time and time again, over 30 years of studies. What prudent person would ignore the economics of using any route that is not the best for the future development of the State of Alaska. What prudent person would ignore the letter from Bruce Carr of Alaska Railroad to Tryck Nyman Hayes dated 12/11/02 in which he says that the Willow route is the only reasonable route, and which he still believes is the best route, per our conversation of May 5, 2010. What prudent person would ignore the wishes of 1172 petitioners. What prudent

Comment Number: 61

person would ignore the future costs of operations and maintenance on the railroad if the optimal route is not chosen, a saving of as much as 46%. What prudent person would chose a route that has double the safety risks as the optimal route.
There are enough factors involved in the Houston South and Big Lake routes that would allow you to make a ruling that the only route that is Prudent, reasonable and therefore feasible is the Willow route.
I submit that you should find that the Willow route is the only prudent, reasonable and feasible route. If you can't find for the Willow route, you should find for the "No Build" option.

Sincerely,
Mike Whedbee

Comment Number: 62

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

May 10, 2010

EI-18159

Mr. David Navecky
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001
ATTN: Section of Environmental Analysis
STB Docket No. 35095

Re: Alaska Railroad Port MacKenzie Rail Line Extension:

Dear Mr. Navecky:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement (DEIS) submitted by Surface Transportation Board (STB) and the Alaska Railroad Corporation (ARRC). The ARRC proposes to construct and operate approximately 30 to 45 miles of new rail line and associated support infrastructure. Currently, eight different rail alignment combinations are proposed to link Port MacKenzie at the terminus to existing rail lines to the North.

Under Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), federal agencies are required to consult with the Secretary of Commerce on any action that may adversely affect Essential Fish Habitat (EFH). EFH has been designated in the project area for anadromous salmon. EFH for salmon consists of the aquatic habitat necessary to allow salmon production needed to support a long-term sustainable salmon fishery and salmon contributions to healthy ecosystems.

General Concerns

The potential impacts to EFH and anadromous species vary considerably amongst the alternatives for this project. Any of the proposed alignments will significantly impact hydro-geomorphic processes, connectivity and function of wetlands, stream and rivers, associated aquatic species and anadromous fish populations these watersheds support.

Improperly designed and constructed stream and river crossings are well documented to have long term negative impacts to EFH and anadromous populations. Although the DEIS describes the numerous negative impacts poorly placed rail crossings will have on wetlands, hydro-geologic functions and associated EFH and anadromous species, there is little in this DEIS to indicate these impacts will be avoided and minimized.

Specific Concerns:

The following list highlights our specific concerns. The enclosure provides our rationale for these concerns.

Comment Number: 62
(continued)

1) The DEIS alludes to NMFS involvement and approval of mitigation measures for EFH designated waters, yet we have not been consulted to date.

2) Although the STB-ARRC cite the Anadromous Salmonid Passage Facility Design (NMFS 2008), as providing guidance to the design and construction of rail crossings, those recommendations are not reflected in the proposed crossing structures.

3) The level of detail and information in the Draft EIS is insufficient to identify appropriate measures to avoid, minimize and mitigate impacts to EFH and anadromous species.

NMFS would be less concerned with the specific rail alignment selected for this project if the stream crossings were designed to incorporate measures and recommendations referred to in the Anadromous Salmonid Passage Facility Design (NMFS 2008), to avoid and minimize long term impacts and subsequent loss of EFH and anadromous species. Whichever alignment is selected as the preferred alternative, it should allocate funding early in the project planning phase, rather than in the final permitting phase, in order to implement appropriate mitigation measures.

Should you have any questions regarding the issues we have identified, please contact Doug Limpinsel at 907-271-6379 or Doug.Limpinsel@noaa.gov.

Sincerely,

James W. Balsiger, Ph.D.
Administrator, Alaska Region

Enclosure

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Comment Number: 62
(continued)

ENCLOSURE: NATIONAL MARINE FISHERIES SERVICE COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PORT MACKENZIE RAIL LINE EXTENSION

EFH Consultation:

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with the National Marine Fisheries Service (NMFS) on all actions that may adversely affect EFH. NMFS is required to make EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. NMFS will provide EFH Conservation Recommendations once a preferred alternative has been selected for the project. In the interim, NMFS offers the following information and comments.

NMFS met with representatives of the STB-ARRC on March 11, 2008 to discuss the potential impacts of rail alignments on ecosystem processes that support anadromous species and EFH, and identified ecological considerations including suggestions for measures to avoid and minimize impacts to anadromous species and EFH. NMFS also suggested the STB-ARRC and project consultants (E-mail 2009), follow design guidance for constructing stream and river crossing structures, such as conveyance structures, bridges, and culverts, as described in the Anadromous Salmonids Passage Facility Design (NMFS 2008), and/or follow the Stream Simulation: An Ecological Approach to Providing Passage for Aquatic Organisms at Road-Stream Crossings (USFS 2008).

The level of detail in the DEIS regarding the proposed rail alignments is insufficient to identify appropriate measures to avoid, minimize and mitigate for adverse effects to living marine resources including EFH. Additionally, the mitigation measures proposed in this DEIS are inadequate to offset the adverse effects of the project on salmon and their habitat. We recommend that STB-ARRC initiate and maintain further dialog with all stakeholders and resource agencies to develop measures that reduce impacts of the final alignments. The preferred rail alignment in the final EIS should incorporate the resource agencies' specific recommended mitigation measures, such as refined alignments and crossing designs to avoid and minimize adverse effects to salmon and EFH.

NMFS Concerns Regarding EFH:

Of greatest concern for NMFS regarding this project are the currently proposed dimensions of culverts and bridges and the lack of information regarding hydrology and anadromous fish presence in streams and rivers to be crossed. NMFS has the following recommendations regarding the design of stream and river crossings and fisheries, hydrologic and wetland surveys.

1) Design of Stream and River Crossings:

Part 1 Section 19.2 (page 19.3, VM-10), and again in Part 2 Section Appendix G.4 (G.4.1, page G-29) of the DEIS, the STB-ARRC references the Anadromous Salmonid Passage Facility Design (NMFS 2008).

> *"Applicant voluntarily proposed the following measures for mitigating potential project related impacts to water resources".*

Comment Number: 62
(continued)

> *"For all project-related crossings of fish-bearing waters that incorporate bridges or culverts, the Applicant shall design, construct, and maintain the conveyance structures in accordance with the National Marine Fisheries Service 2008 publication, "Anadromous Salmonid Passage Facility Design (NMFS 2008), or equivalent and reasonable requirements".*

However, the above referenced design and construction recommendations were not incorporated in the stream and river crossings proposed for this project in the DEIS. A specific example is listed in Section G (Table G.5, pg G.15) entitled Essential Fish Habitat. Crossing point C1-2.6 is identified in the ADFG Anadromous Catalogue as ADFG 247-41-10100-2080, with upper reaches (0010, 0020, and 3002). These reaches are identified as having coho salmon adults and smolt present and rearing habitat. Thus, coho salmon maybe present spawning farther upstream indicating a need for a crossing structure that would accommodate this species at all life stages. The STB-ARRC describes this water body as 27 feet in width, but proposes a "72 inch culvert (6 feet wide)", "buried up to approximately 40 percent of its diameter where possible", and concludes that it would result in "fragmenting coho rearing habitat".

Review of the tables (G.5, pages G 14-16) indicate none of the suggested crossings of any known anadromous waters will use any method or design criteria referenced by the STB-ARRC in the voluntary mitigation measures described in Anadromous Salmonid Passage Facility Design (NMFS 2008). NMFS questions how these specifications represent "Voluntary Mitigation Measures" stated in this DEIS.

Recommendations within the Anadromous Salmonid Passage Facility Design clearly advise that to maintain anadromous passage, minimum hydrological connectivity and instream flow after the rail line is operational, and that the conveyance structure needs to incorporate the following:

"...the minimum culvert bed width must be greater than the bankfull channel width" (section 7.3.2.1-pg 69), or if a stream is not fully entrenched, "the minimum culvert bed width should be at least 1.3 times the bankfull channel width." (section 7.4.2 .1-pg 70).

We have similar concerns regarding fish passage structures listed in section 5.4 (Table 5.4-3, pgs 5.4-10, and Table 5.4-5, pgs 5.4-14 through 5.4-16). Several conveyance structures are listed in these tables for both anadromous and resident fish species and they do not meet the minimal measures prescribed in the Anadromous Salmonid Passage Facility Design (NMFS 2008) or in the Stream Simulation: An Ecological Approach to Providing Passage for Aquatic Organisms at Road-Stream Crossings (USFS 2008).

Of further concern to the NMFS is language in Section 5.4.2 (pg 5.4-1) and G.3.1 (pg G-8).

> *"SEA determined that it would not be reasonable to use the potential impacts that would be anticipated for these undersized structures to distinguish between alternatives because the hydrologic review and the Applicant-proposed conveyance structures are preliminary, and the final conveyance structure types and sizes would be determined during the final permitting and design. ARRC would base final conveyance structure designs on reasonable terms, conditions, and design criteria that would result from the ADF&G Fish Habitat permit that would likely ensure a conveyance structure size similar to the channel width to maintain flow conditions suitable for fish passage."*

Comment Number: 62
(continued)

NMFS recommends that the final EIS include much more detailed plans and specifications for the proposed stream crossing locations (bank full width, depth, seasonal instream flows, presence or absence of fish, instream flow contribution of non-anadromous water to anadromous waters), and associated conveyance structures, including allocation of sufficient funding to cover construction costs. As seen in other projects of this kind, funding for conveyance structures that minimize impacts to fisheries and wetlands may not be available in the final permitting phase of the project unless funds are appropriated in the early planning phase.

2) Fisheries and Hydrology Surveys:

To accurately assess and properly plan for the installation of culverts or bridges an appropriate level of hydrologic and fisheries data needs to be collected at each of the proposed crossings. Streams and rivers transected by the proposed rail alignments, while not currently listed in the ADF&G anadromous catalog, may contain and/or support anadromous populations, or water sources essential in supporting EFH or anadromous populations. If a tributary has been determined not be an andaromous water body, but contributes water to a stream or river that is confirmed anadromous, the impact from the loss of that discharge needs to be considered.

The DEIS (Table 4.2-2, pg 4.2-7), as well as additional data submitted to NMFS (Noel, 2010) indicate that STB-ARRC contractors conducted limited fisheries and hydrology surveys in August of 2008 (8/12-8/16). Surveys conducted for one week in mid August of any year at any proposed crossing do not represent the various seasonal life cycle stages of all anadromous species, nor would these studies represent the complexity of seasonal high flows, typical of April and May during spring snow melt, draining wetlands, or streams and rivers.

Survey design, sampling methods and efforts need to be conducted in a manner that generates defensible results that assist in the design of conveyance structures that avoid and minimize impacts to EFH and anadromous species.

3) Wetlands:

In sections 4.5.3 and C.3 of the DEIS, the STB-ARRC provide an accurate description regarding the important role wetlands play in providing water quality to EFH and andromous species. However, in reviewing methods employed to determine wetland type and function, NMFS concludes the amount of wetlands impacted may be significantly underestimated and not accurately characterized using rapid assessment and aerial surveys methods. Wetland surveys and functional assessments need to be conducted in a manner that generates defensible results and would dictate conveyance structure design and dimensions to further avoid and minimize impacts to EFH.

The DEIS does not include suggestions for full span bridges or to elevate portions of track and alignments to maintain wetland function and aquatic connectivity. If these measures are technically unavailable, the STB-ARRC should justify that rationale. Back filling wetlands and realigning 2,460 feet of known anadromous waters (Cheri Creek, Section G.3.4.8, page G.4) to construct rail alignments through the wetlands does not avoid and minimize impacts to the stream and adjacent wetlands.

Comment Number: 62
(continued)

NMFS recommends a finer level of resolution in identifying and delineating critical and high-value wetlands that support EFH and anadromous species and avoiding especially valuable areas altogether if possible.

Conclusion:

As discussed in the Anadromous Salmonid Passage Facility Design (NMFS 2008), all crossing designs should be based on site-specific information, such as anadromy, seasonal instream flows and peak discharge, and flood plain regime (50-year to 100-year flood events). This information should be included in the final EIS. Crossings that transect EFH and anadromous waters within wetlands should incorporate bridge or elevated tracks to provide long-term water supply.

The DEIS identifies potential adverse effects and environmental impacts that rail line construction and operation could have on wetlands, hydro-geologic functions and associated EFH and anadromous species. However, the DEIS lacks the level of site specific analysis and information required to identify appropriate mitigation efforts that would avoid and minimize long term impacts to anadromous species of Cook Inlet.

In summary NMFS offer the following recommendations:

1) Conduct wetland delineations of final alignments to refine the detail and description of site specific wetland function and hydrologic contribution of transected streams and rivers.

2) Conduct fisheries surveys of all tributaries to be crossed that are not currently listed in the ADF&G Anadromous Catalogue.

    a. Conduct surveys that would represent all anadromous species at all life stages in all waters crossed within each alignment.

3) Conduct hydrologic surveys of all tributaries to be crossed that are not currently listed in the ADF&G Anadromous Catalogue.

    a. Conduct surveys to target seasonal snow melt periods from April and May, when instream flows are of highest magnitude.

4) Design conveyance structures, using suggestions (NMFS 2008, USFS 2008) to accommodate peak instream flows of all life stages of anadromous species in tributaries identified as anadromous.

Comment Number: 62
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Comment Number: 63

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 10, 2010

Mr. David Navecky
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001
ATTN: Section of Environmental Analysis
STB Docket No. 35095

RE: EPA comments on the Draft Environmental Impact Statement for the STB Port MacKenzie Rail Extension Project, EPA Project # 08-011-DOT

Dear Mr. Navecky:

The U. S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the Alaska Railroad Corporation Construction and Operation of a Rail Line Extension to **Port MacKenzie, Alaska** (CEQ #20100089) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of the National Environmental Policy Act (NEPA), specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The draft EIS was prepared to provide the Surface Transportation Board (STB) with information to evaluate a proposal from the Alaska Railroad Corporation (ARRC) to construct and operate approximately 35 to 40 miles of new rail line, and associated support infrastructure, with the goal of connecting Port MacKenzie to the existing rail line. The project is located within the south central portion of the Matanuska-Susitna Borough, extending from the Port MacKenzie District along upper Cook Inlet to the Parks Highway communities of Willow, Houston, Big Lake, and Wasilla. The EIS proposes eight combinations of alignment segments (alternatives) to extend the existing rail service from the vicinity of the Parks Highway. The Surface Transportation Board (STB) is the lead agency for the EIS. The Federal Railroad Administration, U.S. Army Corps of Engineers, and U.S. Coast Guard are Cooperating Agencies. Neither the ARRC nor the STB has identified a preferred alternative at this time.

In the draft EIS, STB takes a good approach to the analysis by establishing segments and associated alternatives for evaluation. Other commendable aspects of the draft EIS include a thorough discussion of mitigation measures, public and tribal involvement, consultation efforts, and the inclusion of greenhouse gas emissions analysis. We are pleased to see sponsorship of a project that will result in the efficient transport of bulk material.

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Comment Number: 63
(continued)

However, there are impacts associated with several of the alternatives that we believe are substantial and cause concern. EPA objects to these alternatives due to potential impacts to water quality, open water habitats, wetlands, stream channels, and riparian areas. There is not enough information to determine whether any of the alternatives comply with CWA 404 (b)(1) guidelines. Most and perhaps all of the proposed alternatives may not qualify as the least environmentally damaging practicable alternative (LEDPA); we believe that appropriate and practicable steps have not been taken to minimize potential adverse impacts on the aquatic ecosystem. We believe that the scope of this consideration was too limited and that the DEIS does not analyze other alternatives and mitigation that could reduce significant impact. Therefore, EPA has concluded that this project violates Clean Water Act Section (CWA) 404(b)(1) guidelines and the NEPA regulations at 40 C.F.R. part 1502.14, and that other alternatives need to be considered before filling waters of the U.S.

We are also concerned about reduction in ecological connectivity and habitat fragmentation from rail line and road construction and operation, as well as proposed waterbody crossings. We believe that there is insufficient information regarding the purpose and need for the project, as well as impacts related to potential material sites and construction staging areas. There is inadequate discussion of potential, disproportionate impacts to vulnerable populations, and lack of meaningful involvement, particularly regarding subsistence. The draft EIS also does not consider visual impacts from the project. Finally, EPA questions the need for a maintenance road to run the length of the line given that ARRC rail line is operated and maintained without such a road in other areas. We encourage STB to continue to refine segment alternatives for the final EIS in order to minimize these impacts in final preferred route development.

Due to these concerns, we have assigned an overall rating of EO-2 (Environmental Objection-Insufficient Information) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference. Additionally, we have rated each action alternative in our enclosed detailed comments.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these comments, please contact Jennifer Curtis of my staff in Alaska at (907)271-6324 or curtis.jennifer@epa.gov.)

Sincerely,

Richard Parkin, Director
Office of Ecosystems, Tribal and Public Affairs

Enclosures

2

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Comment Number: 63
(continued)

EPA DETAILED COMMENTS ON THE SURFACE TRANSPORTATION BOARD PORT MACKENZIE RAIL EXTENSION PROJECT DRAFT EIS

Purpose and Need

In our March 21, 2008, scoping comments, EPA advised the STB that the EIS should include a clear and concise statement of the underlying purpose and need for the proposed action, and clearly reflect the greater public need for the project. The draft EIS does include such statements, but does not provide any quantitative or qualitative data to support the identified project utility and need, such as anticipated customers or freight volume projections. For instance, it would be helpful if the EIS explained how bulk materials are currently being imported or exported, at what costs, and how this project will improve this transport for customers. We recommend that such information be included in the final EIS.

The draft EIS does not discuss the existing bulk material export capability of the Ports of Seward and Whittier, which concerns the need for the project, or the potential for Port MacKenzie to be handling materials normally handled by the other ports, and the potential impacts to those communities. We are also concerned that currently the project description does not include a discussion of potential connection(s) to some conveyor or transport system (other than truck, which requires multiple transfers thus increasing costs and negating the need for reducing transport costs). There is mention of an interest in developing this connection, however. We believe that such a project, to fulfill the stated project purpose and need, should be considered as a connected action in the final EIS. If the project does not include a physical connection to the Port, we recommend that the stated purpose and need be further refined to clearly address this gap. We do appreciate the discussion of the economic benefit or comparability with the current highway travel in the draft EIS, however.

EPA Rating for Each Alternative

EPA recognizes that the STB and ARRC did not identify a preferred alternative for each of the project segment combinations (alternatives). As such, EPA reviewed and evaluated each of the proposed alternatives and provided a rating for each. These ratings are listed in the table below.

Alternative	Environmental Impacts	EPA Rating
Mac West-Conn 1-Willow	Impacts to: local soils (510 acres lost), water resources (requiring approx. 45 structures), 11 identified floodplains, 363 acres of wetlands, 1,272 acres habitat, 2,847 acres core habitat, 16 fish bearing streams (7 anadramous)	EO
Mac West-Conn 1-Houston-Houston North	Impacts to: local soils (297 acres lost), water resources (requiring approx. 51 structures), 10 identified floodplains, 478 acres of wetlands, 1,038 acres habitat, 2,592 acres core habitat, 18 fish bearing streams (9 anadramous)	EO
Mac West-Conn 1-Houston-Houston South	Impacts to: local soils (312 acres lost), water resources (requiring approx. 40 structures), 9 identified floodplains, 424 acres of wetlands, 1,032 acres habitat, 3,210 acres core habitat, 13 fish bearing streams (6 anadramous)	EO

Comment Number: 63 (continued)

Mac West-Conn 2-Big Lake	Impacts to: local soils (317 acres lost), water resources (requiring approx. 42 structures), 6 identified floodplains; 347 acres of wetlands, 1,056 acres habitat, 2,631 acres core habitat, 12 fish bearing streams (8 anadramous)	EO
Mac East-Conn 3-Willow	Impacts to: local soils (608 acres lost), water resources (requiring approx. 30 structures), 9 identified floodplains, 188 acres of wetlands, 1,249 acres habitat, 2,675 acres core habitat, 13 fish bearing streams (6 anadramous)	EO
Mac East-Conn 3-Houston-Houston North	Impacts to: local soils (390 acres lost), water resources (requiring approx. 36 structures), 8 identified floodplains, 301 acres of wetlands, 1,010 acres habitat, 2,419 acres core habitat, 15 fish bearing streams (8 anadramous)	EO
Mac East-Conn 3-Houston-Houston South	Impacts to: local soils (406 acres lost), water resources (requiring approx. 25 structures), 7 identified floodplains, 248 acres of wetlands, 1,003 acres habitat, 3,038 acres core habitat, 10 fish bearing streams (5 anadramous)	EO
Mac East-Big Lake	Impacts to: local soils (322 acres lost), water resources (requiring approx. 26 structures), 5 identified floodplains, 209 acres of wetlands, 930 acres habitat, 1,725 acres core habitat, 10 fish bearing streams (8 anadramous)	EC
No Action	Impacts to: local soils (0 acres lost), water resources (requiring approx. 0 structures), 0 identified floodplains, 0 acres of wetlands, 0 acres habitat, 0 acres core habitat, 0 fish bearing streams (0 anadramous)	LO

We have rated seven of the eight alignment alternatives as Environmental Objection based on the potential for significant impacts to water resources (water quality, open water habitats, wetlands, stream channels, and riparian areas) as well as impacts to terrestrial habitat and habitat connectivity. Overall, based on the information in the DEIS, EPA believes that the Mac East-Big Lake alternative would cause the least overall environmental impact to resources.

However, there is a great deal of missing information for this and all of the alternatives. For example, there is not enough information to determine whether any of the alternatives comply with CWA 404 (b)(1) guidelines. Most and perhaps all of the proposed alternatives may not qualify as the least environmentally damaging practicable alternative (LEDPA); we believe that appropriate and practicable steps have not been taken to minimize potential adverse impacts on the aquatic ecosystem. We believe that the scope of this consideration was too limited and that the DEIS does not analyze other alternatives and mitigation that could reduce significant impact. Therefore, EPA has concluded that this project violates CWA Section 404(b)(1) guidelines and the NEPA regulations at 40 C.F.R. part 1502.14, and that other alternatives need to be considered before filling waters of the U.S.

We believe that regardless of alignment, there are adjustments that can be made to provide better protection or further minimize impacts to various resources, particularly aquatic resources such as wetlands, floodplains, and habitat. Examples of minimization measures include the elimination of a service road along portions of the project, the use of full span bridges

Comment Number: 63
(continued)

at stream crossings, and elevating portions of the track to reduce impacts to wetlands, floodplains, wildlife movement, habitat, and recreation. The incorporation of minimization measures into the alternatives should be documented in the final EIS, and the extent and effect of the measures (e.g., length of elevated track) quantified to facilitate comparisons between alternatives.

It is unclear in the DEIS if earlier efforts were undertaken to avoid, to the maximum extent practicable, impacts to waters of the U.S. If such an alignment exists, and is reasonable and practicable, it should be evaluated in the final EIS. We recognize that CEQ's "NEPA's Forty Most Asked Questions" guidance document states that "reasonable alternatives include those that are practical or feasible from the technical and economic standpoint". However, it does not limit a lead agency's consideration of additional criteria, such as those criteria under the CWA 404(b)(1) guidelines. In fact, the express intent of the CEQ's guidelines and of NEPA itself (Section 102 (B)) is to require federal agencies to ensure that environmental factors receive sufficient consideration in decision-making.

The CEQ regulations at 40 CFR Part 1500.1(c) note that NEPA is intended to help agencies "take actions that protect, restore, and enhance the environment." In the same Section, sub-paragraph (f) instructs that we should "use all practicable means ...to avoid or minimize any possible adverse effects of their actions upon the quality of the human environment. 40 CFR 1500.3 states that the "provisions of the Act and of these regulations must be read to together as a whole in order to comply with the spirit and letter of the law." It is clear that the intent of NEPA is for agencies to incorporate environmental considerations into all phases of project planning.

The CWA §404(b)(1) Guidelines (Guidelines) even more explicitly require proponents to consider environmental criteria in project development. The Guidelines require, in part, that *no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem.* The guidelines define "practicable" as "available and capable of being done after taking into consideration cost, existing technologies and logistics in light of overall project purposes."

The Guidelines contain an explicit, overarching presumption that if a discharge does not "require ...siting within (a) special aquatic site ... to fulfill its basic purpose (i.e., is not `water dependent'), practicable alternatives that do ***not*** involve the discharge of dredged or fill material into special aquatic sites" are available and would result in fewer environmental impacts.

The burden of proof is on an applicant to rebut this presumption by demonstrating that there are no practicable alternatives before a discharge can be permitted. We are concerned that the draft EIS contains insufficient information to demonstrate that any of the alignment alternatives represent the least environmentally damaging practicable alternative (LEDPA). Limiting the selection of alternatives to only those which consider operational or other regulatory criteria, would not, in our view, be consistent with the Guidelines because the presumption would remain, and opportunities to avoid discharge into a special aquatic site would not be fully explored. Because of this, we recommend that STB consider additional alignments to maximize avoidance of waters of the U.S.

Comment Number: 63
(continued)

For example, the 2003 corridor analysis included an alignment that followed the Port MacKenzie Road and Knik-Goose Bay Road. Table 2-1 includes a brief discussion of why that alignment was not included in the draft EIS. It does not appear, however, that an alignment between the current Big Lake segment and Knik-Goose Bay Road was evaluated. Such an alignment could possibly swing east and then north in a broad curve, taking advantage of higher ground, and connect with the mainline near the proposed location for the current Big Lake segment.

The Guidelines also require that "no discharge of dredged or fill material shall be permitted unless appropriate and practicable steps have been taken which will minimize potential adverse impacts of the discharge on the aquatic ecosystem." [40 CFR §230.10(d)]. We believe that, absent substantial efforts to avoid and minimize project impacts, the construction and operation of a rail line extension to Port MacKenzie may result in substantial and unacceptable impacts on aquatic resources of national importance (ARNIs). The Susitna and Little Susitna rivers, Willow Creek, and Knik Arm all support fishery and wildlife resources that are of statewide and national importance. The project area also includes several large wetland complexes which provide hydrologic and ecological support for these ARNIs. We believe that measures such as elevating portions of the rail line are practicable and should be considered where appropriate to minimize impacts to aquatic resources. We question whether an alternative without such measures could be demonstrated as being the LEDPA in compliance with the Guidelines.

For example, the proposed tie-in of the Big Lake segment to the ARRC mainline through the Cheri Creek wetlands does not appear to include any measures to minimize impacts to the stream and adjacent wetlands. We do not believe that the relocation of 2,460 feet of this anadromous stream and construction of the rail embankment, staging area, and access road on solid fill could be demonstrated to represent the LEDPA.

EPA also recommends that the final EIS include a preliminary 404(b)(1) evaluation so that the public can review and comment on it prior to publication of the Record of Decision (ROD). A preliminary 404(b)(1) evaluation would assist in streamlining the 404 permitting process. In addition, the final EIS should discuss and propose compensatory mitigation for all unavoidable impacts to the aquatic environment.

The draft EIS contains very limited information regarding wetland function, and this information is not site-specific. Additional, detailed, site-specific information regarding wetland type and functions will be necessary to compare the environmental impacts of the various alternatives. This is necessary to identify the LEDPA and establish that all practicable steps have been taken to minimize impacts to aquatic resources.

Adequacy of the Draft EIS

We believe that the draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. EPA has assigned a rating of "2" (Insufficient Information) to the adequacy of the draft EIS. As indicated above, we have identified potential alternative alignments that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the

Comment Number: 63
(continued)

proposal. We have identified additional information, data, analyses, or discussion that should be included in the final EIS to meet the requirements of Section 404 of the CWA.

Evaluation of Subsistence Impacts and Environmental Justice

The draft EIS defines subsistence (Section 2.4.5) as the "customary and traditional uses of wild and renewable resources for food, shelter, food, clothing, and other uses" but then goes on to state that since no federally or state designated subsistence areas are located it the project area, impacts to subsistence are only indirect. It is important to note that many residents in south central Alaska practice subsistence activities (as defined by the draft EIS) in the project area and utilize resources that may be impacted by this project. Because subsistence activities do occur in the project area, the conclusion that impacts are only indirect does not reflect the actual activities currently occurring in the project area. We recommend that the final EIS be revised to reflect the subsistence activities, even if different terminology is required, that are occurring in the project area, and that the impacts to those activities, both direct and indirect, be clearly identified.

It is also important to note that Executive Order (EO) 12898 specifically identifies impacts to subsistence as necessitating special treatment. Specifically, Section 4-401 of the EO states "In order to assist in identifying the need for ensuring protection of populations with differential patterns of subsistence consumption of fish and wildlife, Federal agencies, whenever practicable and appropriate, shall collect, maintain, and analyze information on the consumption patterns of populations who principally rely on fish and/or wildlife for subsistence. Federal agencies shall communicate to the public the risks of those consumption patterns." If such populations occur in the project area, and their subsistence activities could be impacted by this project, we recommend that this type of information be collected and integrated into the final EIS.

We note that some alternatives, even the more environmentally preferable Mac East-Big Lake alternative, have potential to cause substantial impacts to private property and/or cultural resources. We are particularly concerned about such impacts if the private property owners meet the criteria of disadvantaged populations. We recommend that there be additional analysis of these communities. We also recommend that steps be taken to ensure that potentially affected communities have meaningful involvement in the process

Bridge and Culvert Designs

To the extent that they are compatible with standards used by the permitting agencies, EPA supports use of the National Marine Fishery Service (NMFS) Anadromous Salmonid Passage Facility Design criteria for all crossings as referenced in the draft EIS. The key point in this design criteria is that all crossings should maintain the normative physical processes within the stream-floodplain-riparian corridor by: 1) promoting natural sediment transport patterns, 2) providing unaltered fluvial debris movement, and 3) restoring or maintaining functional longitudinal continuity and connectivity of the stream-floodplain-riparian corridor. EPA recommends that to avoid and minimize impacts to aquatic resources to the maximum extent practicable, all crossings should consist of a bridge or stream simulation culvert spanning the stream floodplain, providing long-term dynamic channel stability, retention of existing spawning areas, maintenance of food (benthic invertebrate) production, and minimized risk of failure. All crossing designs should be based on site-specific information such as: estimates of peak discharge, flow velocities and patterns; channel stability; sediment and bed load transport;

Comment Number: 63
(continued)

flooding regime (50-year to 100-year flood frequency and magnitude); cross-section profiles of channel morphology and water surface elevations, etc. This information should be included in the final EIS.

Temporary Construction Camp, Material Source Sites, and Staging Areas

We request that the final EIS identify locations and area (acres) for temporary construction camp(s), potential material source sites (if undeveloped sites are considered), waste sites, and staging areas, including sites for storage, rock crushing, other material processing equipment, and equipment turnaround areas. The location of material source sites should be identified, including quantity of materials (cubic yards).

Monitoring and Adaptive Management

Monitoring is important to assess the accuracy of predictions of effects and to ensure the success of mitigations. In addition, monitoring provides the means to identify the need for modifying (increasing or decreasing) mitigation. Adaptive management provides the flexible program for achieving these changes to mitigation. We recommend that the final EIS include a section that describes all of the proposed monitoring that would be necessary to implement the preferred alternative, and any adaptive management strategies that would be employed.

Evaluation of Visual/Aesthetic Impacts

Currently there is little consideration of impacts to visual resources or aesthetics outside of the context of cultural and historic resources, and there is no justification offered for the dismissal of visual impacts in the draft EIS. If visual resources, such as scenic vistas, viewscapes or panoramic views, occur in the project area and could be impacted by the project, the final EIS should include an analysis of such impacts and offer mitigation for such impacts. Otherwise, an explanation of why the issue was excluded from the EIS should be offered.

Figures

Many figures provided in the draft EIS do not provide a level of detail that is necessary to visually determine the extent or types (in some cases) of resources affected by the proposed alternatives. For example, impacts to property types are not represented in any figure in any detail. Many of these resource maps have been developed for ARRC previously, however, and are in the public domain. We recommend that the STB consider incorporating available figures into the final EIS to provide better visual representation of resources and resource impacts if appropriate.

Indirect and Cumulative Effects Analysis

The cumulative impacts discussion does not currently include reasonably foreseeable coal mining activities in Wishbone Hill area, or the development of compressed or liquefied natural gas storage/export facilities that are being planned for the Port MacKenzie area. Since these projects, which are in or in the general vicinity of the project area, could result in the production of a bulk commodity that could be exported from the Port, or displace components of this project, we believe they should be considered in the cumulative impacts section. In addition, if the Wishbone Hill mining plans include rail export (thus a potential customer of the proposed project), or if current Usibelli coal could be diverted from Seward, the impacts from that coal transport (i.e. fugitive coal dust) may need to be considered in the indirect effects analysis.

Comment Number: 63
(continued)

Rail Line Access Road

As discussed above, the draft EIS indicates that ARRC is interested in constructing a road paralleling the entire length of the rail line extension, to be constructed before, and for the purpose of, aiding in the construction and maintenance of the rail line. The document does not, however, explain that other sections of rail line throughout the state do not require such a road, and that maintenance can be performed from the rail line itself via hi-rail equipment (such as in the Chugach National Forest). We continue to have concerns that such roads may not be necessary and as such impacts from such a road are clearly avoidable. We recommend that the final EIS discuss alternatives that eliminate or minimize the access road.

Hazardous Wastes Associated with Known Contaminated Sites

Although EPA has identified the Mac East-Big Lake alternative as the alternative with the least environmental impacts, and our preferred alternative, we also recognize the potential for encountering hazardous wastes associated with the former Susitna Gunnery Range. Since the actual extent of the contamination is not fully identified at this time, we recommend additional analysis be conducted to determine the extent of the contamination. We also recommend that a Hazardous Waste Mitigation Plan be developed for this site prior to construction if this alternative is carried forward for the Board's consideration in the Record of Decision. We recommend that this plan be developed in close coordination with our agency as well as the Alaska Department of Environmental Conservation Contaminated Sites Program.

Emergency/Accident Response and Impacts

The STB has determined that the potential for hazardous material spills from leaks, derailment or collisions is "low" and "unlikely", and only a "slight possibility". The evaluation of potential impacts on various resources also only considers small leaks as opposed to catastrophic failures. While STB is not required to consider a worst case scenario under NEPA, there is no evaluation of ARRC accidents and incidents in the EIS to determine if ARRC's history supports these conclusions.

For instance, there have been numerous ARRC incidents and derailments in the last three decades that have resulted in hundreds of thousands of gallons of fuel released and multiple railcar loads of coal spilled (Dunbar, Curry, Gold Creek, Canyon, etc.). Past ARRC fuel spills have demonstrated that when a major spill does occur, such as the December 1999, Gold Creek spill, response is often slowed or complicated by remoteness of the site, as well as limitations in spill response resource availability, and the resulting impacts can be substantial. Given that ARRC trains contain up to 125 cars, and fuel tanker cars contain up to 23,000 gallons of fuel per car, a worst case scenario derailment or collision could result in hundreds of thousands of gallons of product being released into the environment, which could immediately contaminate a major surface water body. We recommend that that STB reconsider the conclusion that a hazardous material spill or release will result in low impacts given that low frequency and probability does not affect magnitude of the impact should such a spill occur.

Comment Number: 63
(continued)

Specific Comments

Pages 2-1, 2-7 Maximum design speed is listed at 60 mph but operational speed (Class 4) is 40 mph. Please explain this discrepancy. Also, if analysis does not consider higher speed with regard to safety and impacts, it should be revised.

Page 13.1-11 Please provide additional information of the condemnation process, and anticipated impacts from this process.

Page 16-14 Please revise the discussion of temperature changes to reflect that global temperatures have risen 1.5°F since 1900, not 1990.

Page 19-1 We continue to have concerns regarding STB's use of this term. Although we understand it is part of the applicant's process, we continue to believe that the use of this term is misleading to the public.

Comment Number: 63
(continued)

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*
Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

11

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Comment Number: 64

Surface Transportation Board
Incoming Correspondence Record

#EI-18161

Correspondence Information

Docket #:	**FD 35095 0**		
Name of Sender:	Marjorie McLaren	Date Received:	05/10/2010
Group:		Date of Letter:	05/10/2010

Submitter's Comments

My husband and I own property on West Papoose Lake and are opposed to the construction of a rail line on Pt McKenzie that would seriously restrict recreational travel in the Matsu area. The ability to cross rail lines by snowmobile or other means would be greatly restricted, severely limiting winter access and activities in the area. Furthermore, the routes cross lots of wetlands, causing construction and ongoing maintenance issues and potential environmental damage from runoff and access roads. Further, we question the purpose and need for this project. The Port is not deepwater and will need to be dredged just like Anchorage. For two trains a day (forecast), those trains can go to Anchorage. There is no pressing need to build this rail line when one already exists that could absorb the volume.
In summary, we oppose the project as being unnecessary, environmentally harmful, severely damaging to recreation in the area as well as being unnecessarily expensive for any "benefit" received.

Comment Number: 65

STATE OF ALASKA

SEAN PARNELL, Governor

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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Dave Navecky
STB Finance Docket No. 35095
Surface Transportation Board
395 E Street S. W.
Washington, DC 20423-0001

May 10, 2010

Dear Mr. Navecky:

Re: STB Finance Docket No. 35095, Alaska Railroad Corporation Construction and Operation of a Rail Line Extension to Port Mackenzie, Alaska; Issuance of Draft Environmental Impact Statement

The State of Alaska has reviewed the Surface Transportation Board's (STB's) Draft Environmental Impact Statement (DEIS) for the Alaska Railroad Corporation's (ARRC) Port MacKenzie Rail Extension project. The comments in this letter represent the consolidated views of the state's resource agencies.

General Comments

- The inclusion of a permanent access road parallel to the tracks will increase the project footprint and environmental impacts substantially. It will involve increased wetland fill, additional clearing, and longer culverts leading to fish passage issues. The need for an access road should be evaluated in the final EIS. As a rule, the majority of the existing ARRC alignment does not have an access road. If an access road is determined necessary, additional road-specific mitigation measures must be developed and evaluated in consultation with ADF&G and other applicable resource agencies and included in the final EIS.
- Access into 4(f) resources is an issue. The State disagrees with the characterization that existing section-line easements are unlikely to be potentially viable access points into the Susitna Flats State Game Refuge (SFSGR). Appendix M.1.c.2 (Section 4(f) and Section 6(f) Evaluation; page M-30), states that *"It is possible that individuals could also access the refuge via section line easements, though it is unlikely due to the lack of public parking areas and the privately –owned agricultural parcels that would have to be crossed to enter the refuge via section line easements*