

January 31, 2009

Mr. David Navecky
STB Finance Docket #34658
Surface Transportation Board
395 E. St. S.W.
Washington DC 20423-0001

RE: Draft Environmental Impact Statement Finance Docket #34658 Alaska Railroad Corporation Construction and Operation of a Rail Line between North Pole and Delta Junction Alaska.

Dear Sir:

My comments today concern the South Common segment of the northern rail extension between North Pole and Delta Junction. In the south common segment the plan calls for “three bridges over headwaters of the Richardson Clearwater River and several smaller drainages and would include culverts to cross drainage ways and wetland flow ways”. “The three proposed bridges crossings and headwaters of the Richardson Clearwater River include single span bridges ranging from 45 to 65 feet in length”.

THE RICHARDSON CLEARWATER

The Richardson Clearwater Creek is a spring fed perennial stream that flows Northwestward for fourteen miles to the Tanana River approximately 80 miles Southeast of Fairbanks, Alaska and is depicted on the westerly end of the south common segment. It receives the majority of its flow from ground water rather than surface water runoff. Consequently stream flow fluxuates within a very narrow range. The stream’s headwaters are formed by numerous springs that emanate from a low bank at the 1000 foot elevation contour line in section 4 of township 9 south range 9 east, Fairbanks meridian. The largest of these feeder springs contributes approximately 12 cubic feet per second of flow. The stream also receives flow from small springs along its length and two spring fed tributaries.

The Richardson is a very unusual interior Alaska stream because of it short length, laminar flow, stable channel, and exceptional clarity. The streambed is composed of gravel and cobble size rock which is underlain by fine grained sand. Aquatic moss grows submerged in long sinuous clumps or mats attached to the streambed. Stream banks are vegetated and show no signs of erosion. The riparian habitat is a mature spruce and birch forest. Beavers are active near the headwaters and have impounded the tributaries in the recent past.

The Richardson Clearwater supports populations of Coho Salmon, Chum Salmon, Arctic Grayling, Round Whitefish and Longnosed Suckers. Of the above species only Coho Salmon

spawn over winter in the creek. The other species use the stream as a summer feeding area. The only access to this creek is by boat or floatplane.¹

The Richardson Clearwater is characterized by its clear and cold water, stable discharge and the fact that it's access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. In a recent study by the Department of Fish and Game². The Ridder Study characterizes the river as follows:

“The Richardson Clearwater River rises from springs located on the southern flood plane of the Tanana River, three km west of Big Delta. The river is 19 km in length and enters the Tanana River 13 km downstream of Shaw Creek. As with other spring fed systems in the drainage, most notably the Delta Clearwater River, the Richardson Clearwater River can be characterized by its clear and cold water, and stable discharge. Access is limited to river boats via the Tanana River and small float planes on the Richardson Clearwater. The nearest boat launch is at Shaw Creek. The river supports a recreational fishery for Grayling and little angling effort is directed at other available species (white fish, coho salmon, and chum salmon). The Grayling fishery can be characterized as ‘Blue Ribbon’ due to it’s availability of large fish, high density of fish, aesthetic qualities of the river and lack of direct road access.”³

It is clear from the Department of Fisheries Study that the Richardson Clearwater River is a summer feeding grounds for the Artic Grayling that migrate into the river in Mid May from spawning areas located in the Caribou and Rapids Creek in the Shaw Creek drainage area and the Good Pasture River. Tagging studies have shown that the migration is deliberate and characterized by a strong homing behavior.

With a water quality as documented in Footnote 1, The Water Quality Study, and with an abundance of the four varietal sects of fish as documented in Ridder Studies Footnotes #2 and #3. All of which are attached to this comment, there is no question that the Northern Railway extension at least as far as the south common segment is concerned will impact the existing ecosystem and may very likely have disastrous effects on it.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON WATER QUALITY

The water quality will be impacted by the construction and installation of bridges and culverts in the aquifer and wetlands of the Richardson Clearwater. Sluffing and erosion of the stream banks

¹ See water quality study of the Richardson Clearwater Creek near Big Delta, Alaska by Mary A. Maurer Alaska Division of Mining and Water Management Alaska Hydrological Survey March, 1999 released by State of Alaska Department of Natural Resources Division of Geological and Geophysical Surveys 794 University Ave., Suite 200, Fairbanks, AK 99709-3645 appended hereto.

²Contributions of Artic Grayling from Caribou Creek to the Richardson Clearwater River and Shaw Creek, 1980 – 1988 by William P. Ridder November 1994 Alaska Department of Fish and Game Division of Sportfish Fisheries Data Series 94-49 appended hereto.

³ See Fishery Data Series #120 Age, Length, Sex and Abundance of Artic Grayling in the Richardson Clearwater River and Shaw Creek 1988 by William P. Ridder Alaska Department of Fish and Game Division of Sportfish, Juneau, AK 99802.

is a given. There will undoubtedly be increased channel scour, bank erosion and down stream sedimentation. It is unclear what effect thermal erosion of cuts made into the permafrost soils will have but one only has to look at the effect of the Carla Lake fires to see what effect the lack of vegetation in the wetland areas in the headwaters of the Richardson Clearwater has already had.

The fear of all of the residents of the Richardson Clearwater Creek is that three bridges, and numerous culverts that are planned, will destroy the aquifers and interrupt the flow of a totally spring fed river that houses numerous species of fish. We have already had one disaster at the headwaters of this river which was the Carla Lake Fire in the summer of 1998. That fire burned approximately 54,000 acres and its effects on the Richardson Clearwater Creek have been annual floods in which the stream flow, organic matter content, turbidity, and color have been affected. The loss of vegetation due to the forest fire has produced an inability of the vegetation (in the headwaters) to contain the waters at times of heavy rains. Complicating this problem with three to four bridges and numerous culverts will very likely produce a complete disaster with regards to water stability, flow and turbidity.

Obviously geotechnical bore holes will provide direct communication between surface water and ground water but no one knows the effect it will have on the aquifers if they are drilled into. The proposed clearing of 251 acres in the south common segment at a time when the vegetation is trying to rebuild itself can only increase the turbidity and sediment loads associated with that action and with the installation of culverts and bridges.

IMPACT OF THE PROPOSED RAILROAD ROUTE ON FISH HABITAT

The Clearwater River supports Coho spawning and rearing. The noise and vibration caused by pile driving and culvert installation will most certainly impact egg mortality and hatching time in areas near the stream crossings. Vibrations are known to negatively impact development on salmonoid eggs and at certain times disrupt egg membranes leading to egg death. The most devastating thing that could occur in the Coho run is avoidance behavior which will cause them to abandon their winter spawning grounds.

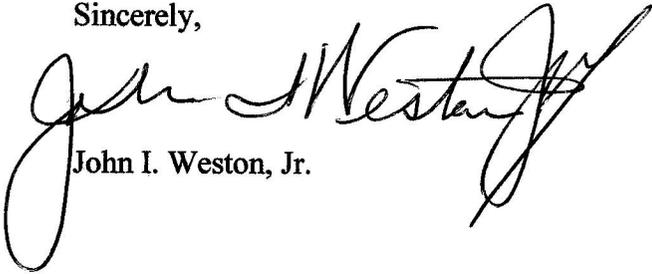
Vibrations and pile driving activities as well as sediment will most certainly have an impact on the Grayling population who also may change their natural patterns and abandon the upper portions of the Richardson Clearwater.

CONCLUSION

The aquifers and headwaters of the Richardson Clearwater produce the constant flow for the river. Any interruption of this flow by blockage of bore holes, bank erosion and downstream sedimentation will certainly affect the water quality of the Richardson Clearwater as well as the fish habitat for the four species of fish that inhabit that area. There is no question under these conditions which are especially fragile after the Carla Lake fire that the south common segment of the Northern Rail Extension should be placed further south and out of the headwaters of the Richardson Clearwater River. Placing it closer to Rainbow Lake or to the south of Rainbow

Lake would give the railroad almost a straight shot into the Donnelly training area and Fort Greeley using the Delta one alternative segment. There is no reason for the Northern Rail Extension to take the chance of drastically injuring the headwaters of the Richardson Clearwater. I would respectfully submit that if the rail extension is acted upon it should be placed much further south and out of the headwaters of the Richardson Clearwater.

Sincerely,

A handwritten signature in black ink, appearing to read "John I. Weston, Jr.", written in a cursive style. The signature is positioned above the printed name.

John I. Weston, Jr.