

STATE OF ALASKA

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

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

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

DRAFT SCOPE OF STUDY

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

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

BIOLOGICAL RESOURCES

Wildlife

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

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

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

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

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

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

Fish

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

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

ADF&G typically conducts aerial surveys in November documenting spawning activity from Benchmark 735 Slough (near S2a MP 7-10) to the Delta River. Upwelling water systems remain open late into the winter, sometimes all winter. However, there are numerous channels and small systems along the south bank that are not surveyed because they are not accessible. Some surveys for juvenile fish on the south bank indicated presence of rearing coho and Chinook salmon in these areas. The lower 2 miles of the Delta River is one of the largest visible sources of upwelling water and the lower ¾ mile is protected under an Interagency Land Management Assignment for the conservation of critical fall chum salmon spawning habitat. Table 1 provides a listing of water bodies currently specified as anadromous.

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

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

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

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

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

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

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

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

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

The Delta River is similar to the other glacial tributaries, except for its lower mile or so. In this lower reach, the Delta River provides spawning habitat for fall chum salmon. The Delta River Interagency Land Management Assignment between the Alaska Department of Fish and Game and the Alaska Department of Natural Resources provides for management of approximately 547 acres in the lower $\frac{3}{4}$ mile of the Delta River for fall chum salmon spawning habitat. The area covered by this agreement typically provides a significant proportion of the total Tanana River basin fall chum spawning area. There are a myriad of clearwater streams and tributaries along the whole southside floodplain and benchlands of the Tanana River in this area, many of which provide important spawning and rearing habitat for anadromous and resident fish species. As specific crossing locations are designated, the EIS needs to identify all fish species and life stage using those locations.

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

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

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

SUBSISTENCE

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

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

RECREATION and ACCESS

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

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

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

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

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

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

Sincerely,



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