

E0-1055



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

April 24, 2007

Kathryn Kusske Floyd, Esq.
Mayer, Brown, Rowe & Maw LLP
1909 K Street, NW
Washington, D.C. 20006

Re: STB Finance Docket No. 34658, The Alaska Railroad Corporation –
Petition for Exemption to Construct and Operate a Rail Line Between
North Pole, Alaska and Delta Junction, Alaska

Dear Ms. Floyd:

Consistent with 40 C.F.R. § 1506.5(a), we would like to request additional information needed for the Section of Environmental Analysis' on-going environmental review in connection with the above-referenced proceeding. The list of information needs is attached and relates to the recently prepared *Applicant's Preferred Route Alternative Report* (March 2007) and *Applicant's Proposed Alignments* (March 2007, Rev. 5).

Thank you for your assistance. In addition to Dave Navecky of my staff, please provide a copy of your response to Mr. Alan Summerville of ICF International, our independent third-party contractor at 9300 Lee Highway, Fairfax, Virginia, 22031. Please feel free to contact me or Dave Navecky at 202-245-0294 if you have any questions.

Sincerely,

Victoria Rutson

Chief

Section of Environmental Analysis

Enclosure

Questions on Applicant's Preferred Route Alternative Report (March 2007)

General. Would the location(s) of the rip rap and ballast sources and other ancillary facilities (other than barrow pits) vary by alignment? If so, explain the differences.

General. Please provide preliminary wetland delineation information for the Rev 5 alignment locations as soon as it is available and prior to field verification.

Section 1.2, Project Description, page 5: states that the project may include a spur line to Blair Lakes Range and/or other facilities to support military operations. Are these facilities part of the Applicant's proposed action or are they actions that the Applicant or the military may undertake at a later time?

Section 3.2, Comparison Criteria, page 8: states that the comparison of alignment alternatives for wetlands compared surface water wetlands systems to isolated wetlands. However, wetlands functions in the project area are more complex than isolated versus non-isolated and there are comparatively few isolated wetlands in the project area (based on USACE definition of an isolated wetland). Was the Functional Assessment used for this comparison or a different method? Describe how the comparison was done?

Section 3.2, Comparison Criteria, page 9: includes a brief discussion of aquatic and terrestrial habitat considerations. Based on this description it is difficult to determine how habitat was used to rate each of the alignment alternatives. Please describe the approach used.

Section 3.2, Comparison Criteria, Page 9: states that deep cuts "run the risk of icing and groundwater issues." Do any of the alignments involve such cuts? If so, approximately where on the alignment(s) would the cuts occur?

Section 4.0, General: Clarify whether the descriptions of soil/peat/permafrost conditions are based on geotechnical data collected for the project.

Section 4.1, Eielson, page 11: Has the Applicant consulted with DoD to determine whether the Eielson North Alternative is feasible?

Section 4.2, Salcha, pages 12-14: Please clarify the anticipated length of bridges for the Flag Hill crossing of the Tanana River, the Salcha crossing of the Tanana River and the Salcha River crossing, and the basis for these lengths. Are these clear span bridges with abutments placed beyond the ordinary high water mark? If interim bridge supports will be used, where will the supports be located conceptually?

Section 4.2, Salcha, page 13: Please clarify the nature, location and extent of anticipated river training structures associated with the Flag Hill and Salcha crossings of the Tanana River.

Section 4.2, Salcha, page 13, last paragraph: What method did the Applicant use to reach a conclusion about wetland impacts for Salcha West in light of the fact that the alignment was relocated to an area that had not been surveyed?

Section 4.2, Salcha, page 13, third full paragraph: states that Salcha West would involve relocating the Richardson Highway in two locations, but the Rev 5 map book seems to show one location. Please clarify.

Section 4.2, Salcha East, page 14, second paragraph: Provide further explanation for the statement that the “cost associated with a structure of this length is anticipated to be significant and prohibitive.”

Section 4.2, Salcha, page 14, fourth paragraph: states that “No areas of cultural interest were identified along the Salcha West alignment alternative.” Please provide substantiation for that statement. A large portion of the Salcha West alignment was moved outside the area covered by the 2005 cultural resource surveys.

Section 4.3, Tanana, page 14, first paragraph: states that “A variant to Tanana West (VI) climbs the west ridge defining the river valley to connect to the Donnelly West segment.” However, Map 11 does not appear to show a variant. Please clarify.

Section 4.3, Tanana, page 15, second full paragraph: states that Tanana East cannot connect to Donnelly West due to grades. However, Map 10 shows the two segments connecting, although the discussion of Maps 10 and 11 on page 19 refers to Donnelly Central connecting to Tanana East (which does occur on Map 12). Please clarify.

Section 4.4, Donnelly: Why was the location of the Donnelly West segment between approximately mile 12 to mile 20 (maps 17 & 18) revised from Rev 4 to Rev 5?

Section 4.4, Donnelly, page 15, second paragraph: notes seeps and icing conditions. Clarify which Donnelly segment(s) have these conditions. Do these conditions also exist at the southern end of the Tanana segments before they connect to the Donnelly East and Central segments (on Map 12)?

Section 4.4, Donnelly, page 15, third paragraph: states that Donnelly Central traverses one of the worst geotechnical areas found to date after crossing Delta Creek. Is this area with poor geotechnical conditions so large that it could not be avoided by adjusting the location of the Donnelly Central segment (for example, by turning more southerly after mile 10 and joining Donnelly West in the vicinity of mile 24/25 rather than mile 28)?

Section 4.4, Donnelly, page 16, second full paragraph: Has DoD indicated that it might want to construct a spur off of Donnelly West and if it has, is it now part of a formal plan? Also, clarify whether the “ideal location” is in the northwest or northeast portion of Donnelly Training Area.

Section 4.5, Delta, page 16: Clarify why constructability is better for Delta South than East or Central.

Section 4.5, Delta, page 16: Clarify why habitat and wetlands do not distinguish among the three Delta segments (per the discussion and table on page 6).

Section 5.1, Salcha East, page 17: Provide further explanation for the statement that “the cost of the two additional bridge structures crossing the Richardson Highway and the Salcha River would increase the construction cost beyond what is reasonably feasible when compared to the Applicant’s Preferred Alternative.”