

North Pole Road/Rail Crossing Reduction Project FONSI

Attachment 3

Public Comments on EA and ARRC Responses

Mayor Isaacson, City of North Pole

James Durst – ADF&G

Karin Landsberg – ADEC

JC Phillips

Gary Tyndall

USAG FWA

Barbara Hotchkin - Re: Fwd: North Pole Road/Rail Crossing Reduction Project EA

From: Barbara Hotchkin
To: Isaacson, Douglas
Date: 5/2/2012 10:18 AM
Subject: Re: Fwd: North Pole Road/Rail Crossing Reduction Project EA
CC: Greenbaum, Jeanette; Lindamood, Brian; Stephenie Wheeler

Mayor Isaacson,

Thank you for commenting on the Environmental Assessment for the North Pole Road/Rail Crossing Reduction Project. All comments received will be forwarded to the Federal Railroad Administration for consideration. We appreciate your continued support for the project. ARRC will coordinate with the City of North Pole regarding acquisition of properties at the end of H & H Lane. Thanks again, Barb

Barbara C. Hotchkin
 Alaska Railroad Corporation
 327 W. Ship Creek Ave.
 Anchorage, AK 99501
 Phone: (907) 265-2313
 Fax: (907) 265-3961
hotchkinb@akrr.com

>>> "Doug Isaacson" <mayor@northpolealaska.com> 4/23/2012 3:52 PM >>>
 To Whom It May Concern:

1. I am writing in support of Alternative C (Proposed Action) for the North Pole Road/Rail Crossing Reduction Project EA.

Several other comments:

2. I support the re-alignment of the refinery loading area to accommodate both Flint Hills and Petro Star along the vicinity of Alternative C and H & H lane, to minimize rail footprint and accommodate the greatest possible of current and potential industrial customers, which may include ISO rail cars transporting LNG to the tank farm proposed in North Pole adjacent to the current GVEA and Flint Hills facilities.
3. Acquisition of any properties at the end of H & H Lane not currently in the City but accessible by H & H Lane--either currently or as a result of proposed development--should be brought into the City of North Pole by petition of the ARRC to ensure greatest amount of benefit to the ARRC and to the City, which maintains H & H Lane.
4. I support the grade separation at 9 mile and will be working with FMATS to recommend the Northern Region DOT, and or DOT&PF headquarters, insert this project into the STIP, 9 mile now becoming a much higher priority than the illustrative Moose Creek grade separation crossing.

Douglas W. Isaacson, Mayor
 City of North Pole
 125 Snowman Lane
 North Pole, Alaska 99705
 Ph: 907-488-8584
 Cell: 907-322-3133
 Fx: 907-488-3002
www.northpolealaska.com
 North Pole, Alaska: "Where the Spirit of Christmas Lives Year Round"

Barbara Hotchkin - Re: FW: North Pole Road/Rail Crossing Reduction Project - EA Availability

From: Barbara Hotchkin
To: Landsberg, Karin J (DEC)
Date: 5/2/2012 10:14 AM
Subject: Re: FW: North Pole Road/Rail Crossing Reduction Project - EA Availability
CC: Brian Lindamood; Hardesty, Joan E (DEC); Heil, Cynthia L (DEC); Jeanette Greenbaum; Stephenie Wheeler

Karin,

Thank you for commenting on the Environmental Assessment for the North Pole Road/Rail Crossing Reduction Project. All comments received will be forwarded to the Federal Railroad Administration for consideration. Barb

Barbara C. Hotchkin
Alaska Railroad Corporation
327 W. Ship Creek Ave.
Anchorage, AK 99501
Phone: (907) 265-2313
Fax: (907) 265-3961
hotchkinb@akrr.com

>>> "Landsberg, Karin J (DEC)" karin.landsberg@alaska.gov > 4/16/2012 8:50 AM >>

Barbara,

I have reviewed the EA for the North Pole Road/Rail Crossing project and have no comments.

Please let Cindy or I know if you have any questions.

Cheers,

Karin

Karin Landsberg | Environmental Program Manager I | Air Quality Division | AK DEC | karin.landsberg@alaska.gov | 907-269-4913

From: Heil, Cynthia L (DEC)
Sent: Monday, April 09, 2012 1:41 PM
To: Landsberg, Karin J (DEC); Hardesty, Joan E (DEC)
Subject: FW: North Pole Road/Rail Crossing Reduction Project - EA Availability

Hi Karin, can you (or Joan) please review and get any air quality/conformity concerns back to them before April 25? I thought I would take care of this, but losing a week to being ill, I am now way behind! Thanks.

Cindy Heil
Air Non-Point & Mobile Sources Program Manager
907-269-7579

From: Barbara Hotchkin [<mailto:Hotchkinb@akrr.com>]
Sent: Wednesday, March 21, 2012 2:20 PM

To: Hooper, Barry L (DOT); Smyth, William J (DEC); Effinger, Robert A (DOT); Campbell, Bruce W (DOT); Heil, Cynthia L (DEC); Maas, Deborah F (DFG); Sackinger, Robert B (DNR); Durst, James D (DFG); Wieggers, Janice K (DEC); Joan Hardesty; Bittner, Judith E (DNR); Rickman, Summer L (DNR); Gary Foreman; Helfinstine, James; Donna J. Gardino; Jackson C. Fox; Jerry Cleworth; jconner@co.fairbanks.ak.us; Jennifer Schmetzer; mayor@co.fairbanks.ak.us; Michael Cox; Bernardo Hernandez; Paul Costello; Scott Johnson; Tom Hancock; Sheehan, Tamara (DNR sponsored); John Lohrey; Forsling, Peter (DOT sponsored); Tim Haugh; Birkholz, Ethan N (DOT); Jennifer Curtis; Wayne Elson; Bill Gryder; Todd Boyce; Deborah Rocque; Bob Henszey; Doug Limpinsel; Bill Butler; Douglas Isaacson; Ellen Lyons; Carrie McEnteer; Doug Houpt; Michael Meeks; Robert Marcinkowski; David Williams; John Schaake; Marcus Palmer; Mary Azelton; Colonel Reinhard Koenig; Tim Feavel

Cc: Carr, Bruce (DOT sponsored); Jeanette Greenbaum; Brian Lindamood; Tim Sullivan; Stephenie Wheeler; John FRA Winkle; Heather Campfield; Jessica Christianson; Kristen Hansen

Subject: North Pole Road/Rail Crossing Reduction Project - EA Availability

Dear Interested Party:

The Alaska Railroad Corporation (ARRC) and the Federal Railroad Administration announce the availability of the Environmental Assessment (EA) for the proposed North Pole Road/Rail Crossing Reduction Project. You are receiving this email because you were identified as an interested party during the scoping process.

The EA is available for you to download and review via the project FTP site at <ftp://ardot:p3pp3r@ftpa.dowlhkm.com>. If prompted for a username and password, use the following (note, both are case sensitive):

Username: ardot

Password: p3pp3r

In addition to the project FTP site, a copy of the EA is available for public review at the following locations:

- Noel Wien Public Library
- North Pole Branch Public Library
- Fairbanks North Star Borough
- City of North Pole Office

You are also invited to attend a public meeting to discuss the EA findings and the project's economic, social and environmental impacts:

Public Meeting

Thursday, April 5, 2012, 4:30 - 6:30 p.m. (Presentation at 5:30 p.m.)

Hotel North Pole, 449 N. Santa Claus Lane

The 30-day review and comment period will end on **Wednesday, April 25, 2012**. Written comments may be e-mailed to public_comment@akrr.com or mailed to Alaska Railroad Capital Projects, P.O. Box 107500, Anchorage, AK 99510-7500.

Requests for a hard-copy of the document or a CD containing the EA and associated appendices may be directed to Jeanette Greenbaum at (907) 265-2440 or GreenbaumJ@akrr.com.

Thank you for your interest in this project. Barbara Hotchkin

Barbara C. Hotchkin

Alaska Railroad Corporation
327 W. Ship Creek Ave.
Anchorage, AK 99501
Phone: (907) 265-2313
Fax: (907) 265-3961

hotchkinb@akrr.com

Barbara Hotchkin - Re: ADF&G Comments - North Pole Road/Rail Crossing Reduction Project Draft EA

From: Barbara Hotchkin
To: Durst, James D (DFG); Wheeler, Stephenie
Date: 5/2/2012 10:22 AM
Subject: Re: ADF&G Comments - North Pole Road/Rail Crossing Reduction Project Draft EA
CC: benjamin.n.soiseth@usace.army.mil; Borba, Bonnie M (DFG); Brase, Audra L (DFG); Brian Lindamood; Carter, Marla M (DFG); Estensen, Jeff L (DFG); Greenbaum, Jeanette; HCD.Anchorage@noaa.gov; Jewel_Bennett@fws.gov; mayor@northpolealaska.com; Milles, Christopher C (DNR); Ott, Alvin G (DFG); Pilon, Timothy A (DEC); planning@co.fairbanks.ak.us; Simon, James J (DFG); Stephenie Wheeler; Young, Donald D (DFG)

Jim,

Thank you for commenting on the Environmental Assessment for the North Pole Road/Rail Crossing Reduction Project. All comments received will be forwarded to the Federal Railroad Administration for consideration. ARRC will contact ADF&G for guidance early in the process if fencing, mounding, or other impediments to wildlife movements are proposed during final design. Thanks again, Barb

Barbara C. Hotchkin
Alaska Railroad Corporation
327 W. Ship Creek Ave.
Anchorage, AK 99501
Phone: (907) 265-2313
Fax: (907) 265-3961
hotchkinb@akrr.com

>>> "Durst, James D (DFG)" <james.durst@alaska.gov> 4/25/2012 1:30 PM >>>

Barb:

Attached for your information are ADF&G's comments on the draft EA for the North Pole Road/Rail Crossing Reduction Project. Please call if you have questions or need more information.

Jim Durst
ADF&G Habitat
459-7254

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPARTMENT OF FISH AND GAME

DIVISION OF HABITAT

1300 COLLEGE ROAD
FAIRBANKS, AK 99701-1551
PHONE: (907) 459-7289
FAX: (907) 459-7303

April 25, 2012

Ms. Barbara C. Hotchkin, Manager
Project Permits and NEPA
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, AK 99510-7500

Dear Ms. Hotchkin:

Re: ARRC North Pole Road/Rail Crossing Reduction Project Draft EA Comments

The Alaska Department of Fish and Game (ADF&G), Division of Habitat has reviewed the March 2012 draft of the Environmental Assessment (EA) for the proposed North Pole Road/Rail Crossing Reduction Project. During review of the EA, Habitat consulted with the ADF&G divisions of Commercial Fisheries, Sport Fish, Subsistence, and Wildlife Conservation.

In general, ADF&G found the EA to be a concise, well-presented document. Of the alternatives presented, we concur that Alternative C is preferred. We noted the design elements included to provide human access across the alignment and levee areas, and continue to defer to the City of North Pole and the Fairbanks North Star Borough for public access issues along and across the project.

During construction of the Moose Creek Dam flood control project and the Tanana River levee in the 1970s, several historic side channels and sloughs were realigned or isolated including Piledriver Slough. As a result, Piledriver Slough now enters the Tanana River well upstream of the road/rail crossing reduction project area after flowing southeast along the upstream portion of the flood control project levee system. ADF&G mapping, as referenced in the EA, is incorrect. In recognition of this channel disruption, we recommend renaming the fragment of Piledriver Slough within the project area, perhaps to Daphne Slough as recognition of its location near Daphne Road. It will remain an anadromous water body. We will pursue updating our digital records.

ADF&G understands that no significant fencing, mounding, or similar impediments to movement of wildlife are proposed along the new Alaska Railroad right-of-way at this time. As such, the potential for alteration of moose travel patterns or access to habitat is considered low. If potential restrictions of free movements by wildlife are planned for the right-of-way in the

future, please contact ADF&G early in the process so we can provide guidance on design of appropriate crossing aids and structures to avoid and minimize effects.

Any questions or concerns about this permit may be directed to Habitat Biologist Jim Durst at 907-459-7254 or emailed to james.durst@alaska.gov.

Sincerely,



William A. Morris, Regional Supervisor
Division of Habitat
Alaska Department of Fish and Game

ecc: Tim Pilon, ADEC Water, Fairbanks
Al Ott, ADF&G HD, Fairbanks
Bonnie Borba, ADF&G CF, Fairbanks
Jeff Estensen, AD&G CF, Fairbanks
Audra Brase, ADF&G SF, Fairbanks
Marla Carter, ADF&G SF, Anchorage
Jim Simon, ADF&G SUBS, Fairbanks
Don Young, ADF&G WC, Fairbanks
Chris Milles, ADNDR DMLW, Fairbanks
Ben Soiseth, COE, Fairbanks
NOAA Fisheries, Anchorage
Jewel Bennett, USFWS, Fairbanks
Bernardo Hernandez, Fairbanks North Star Borough
Doug Isaacson, City of North Pole
Greg Lotakis, ARRC, Anchorage
Jeanette Greenbaum, ARRC, Anchorage

WAM/jdd



North Pole Road/Rail Crossing Reduction Project EA

Your input is important to the Environmental Assessment (EA) process. Please submit comments on the EA by April 25, 2012. Please write legibly (printing is appreciated). Attach additional sheets if necessary.

COMMENT FORM

[Empty box for title or subject]

Name
JC Phillips


Phone


Address
PO BOX 70567 FBK AK 99707


Email


Your Comments:
In light of the MOU between the ARR and FNSB dated 25 June 07 the ARR should not be proposing a new road-rail grade separation on the Richardson Highway. The parties to the agreement agree to define a new rail corridor from Sheep Creek to Moose Creek. The MOU states that the long term goal of both parties is to relocate rail traffic south of Fairbanks and out of the core of the community. Further

The Alaska Railroad welcomes your input. Please send your written comments:

 Capital Projects - Public Comment
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, AK 99510-7500

 ARRC's TTY/TTD 265-2620
or voice 265-2494
Alaska Relay TTY 800-770-8973 or
voice 1-800-770-8255

 public_comment@akrr.com

 Fax (907) 265-2365

over

the parties agree that routes south of Fairbanks are preferred solutions over increasing speeds or elevating rail traffic through the College Rd, Trainor Gate, New Steese, Old Steese areas of Fairbanks

Promoting a new rail-road grade separation eliminates or undercuts the intent of the MOU.

ARR needs to develop an overall plan for the rail realignment before implementing phased improvements that would eliminate options for a comprehensive overall plan.

J. C. Phillips

Public Comment Information

Public Comment Period: 10/15/2024 - 11/15/2024

Comments should be submitted to: publiccomment@alaska.gov

For more information, visit: <https://www.alaska.gov/transportation>

Alaska Department of Transportation

JC Phillips
P.O. Box 70567
Fairbanks, Alaska 99707

18 April 2012

Christopher Aadnesen, President and CEO
Alaska Railroad Corporation
P. O. Box 107500
Anchorage, Alaska 99510-7500

Re: North Pole ARR Realignment Project, public comments

Dear Mr. Aadnesen,

The Proposed Action Alternate (Alternate C) within the environmental assessment for the North Pole Rail Realignment Project proposes a grade-separated crossing of the Richardson Highway at 9 mile.

In light of the Memorandum of Understanding (MOU) between the Fairbanks Star Borough and the Alaska Railroad Corporation dated 25 June 2007 it is not appropriate to propose a grade-separated crossing at this time. The first paragraph of the MOU states "ARRC and FNSB agree to commence defining a new rail corridor from the west side of Fairbanks near Sheep Creek to the east side of North Pole near Moose Creek". Further the next to last paragraph states "This MOU demonstrates that the long term goal of both parties is to move rail traffic out of the core of the community and relocate it south of town. (*i.e. Fairbanks*) The parties acknowledge that while a "no build" option will be considered under every phase, one purpose of this MOU is to articulate the parties' agreement that routes south of Fairbanks are preferred solutions over increasing speeds or elevating rail traffic through the Trainor Gate-New Steese-Old Steese areas of town".

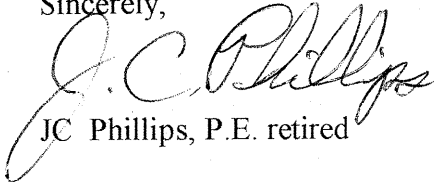
ARR crosses three major heavily trafficked multilane arterials at-grade in this part of town. These crossings are at College Road, the Old Steese Highway and the Steese Expressway. Due to the continuing intense retail development in the area an additional very much needed at-grade crossing has been approved and will be constructed within the next year and a half.

Before proposing a very costly grade-separated crossing of the Richardson Highway at 9 mile, the location of the new rail corridor should be established as set forth by the terms of the MOU. Once the new rail corridor is established the decision can be made as to the necessity and location of a grade-separated crossing of the Richardson Highway. Making that decision at this time violates and undermines the overall intent of the MOU.

Even before considering this project for further funding, which is estimated to cost fifty million dollars, not including the ten million dollar grade-separated crossing at 9 mile, be aware that the cost of currently needed transportation improvements within the FMATS area already far exceeds available and projected state capital project funding.

Since ARR operations is prime beneficiary of the proposed improvements, the Alaska Railroad should have the primary responsibility for funding the improvements without adversely affecting the funding, or otherwise delaying, other much needed transportation improvements within the FMATS boundaries.

Sincerely,



JC Phillips, P.E. retired

Copy:

Mayor Hopkins
Fairbanks North Star Borough
P. O. Box 71267
Fairbanks, Alaska 99707

✓ Capital Projects (Public Comments)
P.O. Box 107500
Anchorage, Alaska 99501-7500

**MEMORANDUM OF UNDERSTANDING #1
FAIRBANKS NORTH STAR BOROUGH
ALASKA RAILROAD CORPORATION**

25 June 2007

THE PURPOSE OF THIS MOU

Alaska Railroad Corporation (ARRC) and Fairbanks North Star Borough (FNSB) desire to optimize the alignment of the Alaska Railroad within the Fairbanks-North Pole area to improve safety, customer response, and minimize transportation conflicts within the adjacent communities. ARRC and FNSB agree to commence defining a new rail corridor from the west side of Fairbanks near Sheep Creek to the east side of North Pole near Moose Creek. This effort is hereby named the Fairbanks – North Pole Rail Realignment (F-NPR). Additionally, ARRC and FNSB will pursue a study to determine possible passenger transit services for the communities along the route.

OVERVIEW

Several major engineering studies have thoroughly investigated alternatives for rail realignment through the Fairbanks-North Pole area. One such segment, commonly known as the Ft. Wainwright Bypass, has been approved to provide Independent Utility and is proceeding with Department of Defense funding. It should be considered an interim route around Ft. Wainwright until such time as the F-NPR is completed.

The overall size and cost of the F-NPR is considerable and will almost certainly require that engineering, funding and construction be accomplished in phases, although these phases would be worked as simultaneously as possible. In recognition of the need for project clarity and considering that “phases” were used in previous studies over years past, a re-naming of proposed F-NPR segments is in order. The Richardson Highway Mile Post 9-North Pole project is clearly the least complex from both a financial and engineering point of view, and shall be called **Phase 1**. The safety benefits resulting from the Richardson Highway Mile Post 9 to North Pole phase are very substantial. Public transit is a distinct possibility for Phase 1. The NEPA process for Phase 1 can be accomplished expediently by relying on the engineering effort and environmental studies conducted to date. Securing independent utility in order to set the scope of study for NEPA looks to be a possible strategy for proceeding with Phase 1 and if determined to be viable will be supported by the FNSB.

ARRC will continue the alternative analysis engineering study for the area from Richardson Highway Mile Post 3 to Richardson Highway Mile Post 9 (**Phase 2**) and for the remaining realignment segment west of Phase 2 past the Chena River (**Phase 3**). Phase 1 should be first priority among the three phases.

Phase 1 Considerations

The existing Tanana River Levee provides a feasible realignment corridor for the railroad that the partners believe would improve safety, minimize traffic conflicts and optimize freight/transit through the area. The Tanana River Levee was constructed by the US Army Corps of Engineers (COE) and is now the responsibility of the FNSB. As part of Phase 1 the FNSB and the ARRC will develop a no-fee “exclusive use easement” right of way and work cooperatively with permitting authorities to ensure use of the area on or near the levee as a rail corridor through a right-of-way agreement. Maintaining

the structural integrity of the rail/levee combination is essential, is in the vital interest of all parties, and must not be compromised. The addition of a railroad on or near the levee could also be used to improve the structural integrity of the levee. As the railroad is realigned to the levee, with the approval of the COE where necessary, the ARRC could assume the FNSB's responsibility for maintenance of the levee in accordance with the COE agreements.

Once the railroad and engineering design for the levee commences, the ARRC and FNSB will seek public input and identify opportunities to enhance recreational trails. The FNSB has a designated recreational trail in the levee area that is largely undeveloped and its upgrade could be an integral part of the project. ARRC would provide access to the river-side of the levee where appropriate. ARRC and FNSB will cooperate to mitigate personal and vehicle access issues arising from the new railroad location. Access is expected to be approved for certain designated locations and will generally coincide with section lines and/or major roadway alignments. FNSB will support ARRC efforts to obtain required Federal approvals, such as "4(f)", which addresses impacts to recreational trails.

Any railroad right-of-way to be completely vacated by F-NPR will trigger statutory evaluation for possible reversion, beginning with North Pole in Phase 1.

Phase 2 and Phase 3 Considerations

As the ARRC progresses on the design and construction of Phase 1, efforts will turn to the west. The FNSB and the ARRC will aggressively pursue funding for planning and design of Phases 2 and 3 of the F-NPR.

This MOU demonstrates that the long term goal of both parties is to move rail traffic out of the core of the community and relocate it south of town. The parties acknowledge that while a "no build" option will be considered under every phase, one purpose of this MOU is to articulate the parties' agreement that routes south of Fairbanks are preferred solutions over increasing speeds or elevating rail traffic through the Trainor Gate -New Steese - Old Steese areas of town.

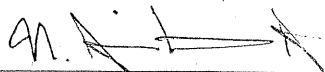
As each phase of railroad relocation develops, the ARRC and the FNSB can draw up further MOU's or right of way agreements as necessary to lock-in specific details for the subsequent project phases.

For the
ALASKA RAILROAD CORPORATION



Patrick K Gamble
President & Chief Executive Officer

For the
FAIRBANKS NORTH STAR BOROUGH



Jim Whitaker
Mayor



May 3, 2012

J.C. Phillips
P.O. Box 70567
Fairbanks, AK 99707

CORPORATE AFFAIRS

TEL 907.265.2671
FAX 907.265.2365

Dear Mr. Phillips:

Thank you for commenting on the Environmental Assessment (EA) for the North Pole Road/Rail Crossing Reduction Project (North Pole Project). As you are aware, the project constitutes Phase 1 of a larger project to realign the tracks outside of the more congested areas of Fairbanks and North Pole. This letter responds to hand-written comments you submitted at the public meeting on April 5, 2012, and in a subsequent letter dated April 18, 2012, and addressed to ARRC President and CEO Christopher Aadnesen. Following review of your comments, Mr. Aadnesen asked that we respond to your concerns, including adherence to the June 2007 Memorandum of Understanding (MOU) between the Alaska Railroad (ARRC) and the Fairbanks North Star Borough (FNSB).

***Concern 1:** In light of the MOU between the FNSB and ARRC, it is not appropriate to propose a very costly grade-separated crossing of the Richardson Highway at Mile 9 at this time. Before doing so, the locations of the new rail corridor (for Phases 2 and 3) should be established as set forth in the MOU. Once the new rail corridor is established the decisions can be made as to the necessity and location of a grade-separated crossing of the Richardson Highway. Making that decision at this time violates and undermines the overall intent of the MOU.*

Response: The ARRC, in concert with the FNSB, is executing the MOU in good faith. Due to the complexity and magnitude of the overall Fairbanks-North Pole Rail Realignment (F-NRP), the MOU acknowledges that the larger project must be pursued in phases, and that the North Pole segment makes sense as Phase 1. As specifically stated in the MOU, the "NEPA process for Phase 1 can be accomplished expediently by relying on the engineering effort and environmental studies conducted to date. Securing independent utility in order to set the scope of study for NEPA looks to be a possible strategy for proceeding with Phase 1 and if determined to be viable, will be supported by the FNSB."

The Federal Railroad Administration (FRA), the lead agency for conducting the EA, determined that the North Pole Project (Phase 1) does “have independent utility and immediate need and would provide substantial benefits regardless of the outcome of the larger” project. Further, the FRA confirmed that the project would not preclude implementation of any alternatives that may be considered for subsequent phases of the Fairbanks-North Pole overall project, nor would it render any alternatives infeasible (please see page 3 of the EA document).

Notably, in comments on the EA, the Mayor of North Pole expressed support for the grade separation at mile 9 and indicated he will be working with the Fairbanks Metropolitan Area Transportation System (FMATS) to recommend the Northern Region of the Alaska Department of Transportation and Public Facilities (ADOT&PF) and headquarters to include this project into the Statewide Transportation Improvement Plan (STIP). He believes the mile 9 grade separated crossing is becoming a much higher priority than the Moose Creek grade separated crossing. The grade-separated crossing at Richardson Highway Mile 9 is also supported by ADOT&PF.

Please also note that the MOU specifically states that “[a]s the ARRC progresses on the design and construction of Phase 1, efforts will turn to the west. The FNSB and the ARRC will aggressively pursue funding for planning and design of Phases 2 and 3 of the F-NRP.” Funding has not been secured for construction of Phase 1, nor for preliminary engineering and environmental analyses for Phases 2 and 3. However, consistent with the MOU, efforts by ARRC and the FNSB to identify funding sources and seek funding are ongoing.

***Concern 2:** The cost of currently needed transportation improvements within the FMATS area already far exceeds available and projected state capital project funding. Since Alaska Railroad operations are the primary beneficiary of the proposed improvements, it should have the primary responsibility for funding the improvements without adversely affecting the funding or otherwise delaying other much needed transportation improvements within the FMATS boundaries.*

Response: The North Pole Project, requested and supported by the City of North Pole and the FNSB, is primarily about safety. The purpose, as stated in the EA, is to enhance public safety, reduce transportation conflicts, and improve ARRC’s operating efficiency while ensuring continued rail access to existing and potential future ARRC customers and minimizing impacts to businesses and property owners. As specifically stated in the MOU, the safety benefits of Phase 1 are substantial.

To summarize information in the EA, the project would result in a reduction in vehicle crossings in the City of North Pole, a grade-separated crossing at the Richardson Highway, fewer petroleum tank rail cars traveling and/or stored in the City of North Pole, and fewer delays to emergency vehicles. The project would provide much needed safety benefits to the North Pole community and roadway users, including pedestrians. Under the proposed action, nine at-grade crossings would be eliminated, and three others would have significantly reduced train traffic due to their

location on a rail spur instead of the main line. Safety is enhanced through the center of North Pole by eliminating crossings that are frequented by busses, school children walking to and from school, emergency response vehicles, etc. The existing track passes between two schools — the North Pole High and Middle Schools that are accessible from the Old Richardson Highway. Public activities near the schools and frequenting of businesses in North Pole present increased risk each day, as students and the general public use the existing at-grade crossings. As such, we fundamentally disagree with your assertion that the Alaska Railroad operations are the primary beneficiary of the proposed improvements.

We are well aware of the funding constraints for project construction. ARRC and the FNSB will seek funding for construction of the North Pole project, and we are not ruling out any potential funding sources at this time. Also, as previously mentioned, in line with the MOU, we continue to seek funding to pursue the second and third phases, beginning with the environmental work.

Again, thank you for your interest in this project and the Alaska Railroad.

Sincerely,

A handwritten signature in cursive script that reads "Stephenie Wheeler". The signature is written in black ink and is positioned above the typed name and contact information.

Stephenie Wheeler, Corporate Communications Officer
(907) 265-2671, wheelers@akrr.com

Barbara Hotchkin - Comments on EA for the North Pole Road/Rail Crossing Reduction Project

From: Barbara Hotchkin
To: Tyndall, Gary
Date: 5/2/2012 10:32 AM
Subject: Comments on EA for the North Pole Road/Rail Crossing Reduction Project
CC: Brian Lindamood; Jeanette Greenbaum; Stephenie Wheeler

Mr. Tyndall,

Thank you for commenting on the Environmental Assessment for the North Pole Road/Rail Crossing Reduction Project. All comments received will be forwarded to the Federal Railroad Administration for consideration. Barb

Comment Form
for
North Pole Road/Rail
Crossing Reduction Project EA

Gary C. Tyndall
P.O.Box 82977
Fairbanks, Alaska 99708
907-474-6548 (w)
tyndalls@ptialaska.net

Comments:

The proposed railroad realignment would eliminate several railroad/highway crossings. Each of these existing "intersections" is a potential accident site, and each causes delays to highway traffic whenever a train is passing – day or night, rain or snow. The existing at-grade crossing of the Richardson Highway is particularly disruptive, and higher risk due to highway traffic speeds and volume. Having to make a sudden, unplanned stop in the dark, deep cold, and ice fog is especially tense.

This project would be constructed almost entirely over previously disturbed ground, and it would have only minimal effect on adjacent properties. Removing the at-grade crossings would improve safety, reduce maintenance costs, and eliminate the need for the train to blow its very loud, far-reaching "whistle" at any hour of the day or night. Building an overpass on the Richardson Highway (Alternative C), in particular, would make both highway and railroad operations safer as well as more efficient. It would also eliminate moose crossing collisions in this area, yet allow for moose passage. Moving the railroad tracks out to the perimeter of existing development instead of leaving them to divide the community like a wall is another significant benefit.

The project EA adequately addresses the issues. With so many positive aspects, both near- and long-term, this project should proceed and with high priority for earliest possible construction.

GCT (long time resident of the area)
Barbara C. Hotchkin

Barbara Hotchkin

From: Barbara Hotchkin
Sent: Thursday, May 31, 2012 12:00 PM
To: 'McEnteer, Carrie L CIV USARMY IMCOM PACIFIC (US)'
Cc: Meeks, Michael T CIV (US); Seibel, Clifford A CIV (US); Larsen, Gary W CIV (US); Siftar, Kathleen D CIV (US); Chemi, Anne M CIV (US); Sprau, Matthew H CTR (US); Houpt, Douglas W CIV (US); Jeanette Greenbaum; Brian Lindamood
Subject: RE: North Pole Road/Rail Crossing Reduction Project - EA Availability (UNCLASSIFIED)

Thanks for getting back to us so quickly Carrie. These edits look fine, but I would like to talk to you about the comment at the end of the document regarding wetlands. The EA includes the following statement in the Environmental Commitments and Mitigation section regarding wetlands:

"Wetlands. ARRC would clearly identify vegetation clearing and construction limits (boundaries) by staking, flagging, and/or fencing to prevent physical disturbance beyond the project limits authorized by the USACE Section 404 Permit. ARRC would comply with the provisions of the Section 404 Permit, including compensatory mitigation for unavoidable impacts to wetlands. Temporary impacts to wetlands during construction would be minimized, and staging activities would occur in non-wetland locations to the extent possible. Native vegetation would be reestablished in areas that are temporarily disturbed. The project would include drainage structures, as needed, to maintain existing drainage patterns and/or hydrologic connectivity."

This already seems to cover everything in your comment except for analysis of what % of wetlands will be disturbed in the 6th level watershed. This is not something that is typically requested by the USACE for permitting, but naturally we will do everything USACE Regulatory requires relative to wetlands delineation/functional analysis during the permitting process. As such, I am reluctant to commit conducting a the 6th level watershed analysis during permitting in the EA Addendum. Also, keep in mind that there are no wetlands impacts in Dyke Range. Would you be okay with leaving the wetlands mitigation statement as is? Let's discuss this afternoon. Thanks, Barb

-----Original Message-----

From: McEnteer, Carrie L CIV USARMY IMCOM PACIFIC (US) [mailto:carrie.l.mcenteer.civ@mail.mil]
Sent: Thursday, May 31, 2012 9:45 AM
To: Barbara Hotchkin
Cc: Meeks, Michael T CIV (US); Seibel, Clifford A CIV (US); Larsen, Gary W CIV (US); Siftar, Kathleen D CIV (US); Chemi, Anne M CIV (US); Sprau, Matthew H CTR (US); Houpt, Douglas W CIV (US); Jeanette Greenbaum; Brian Lindamood
Subject: RE: North Pole Road/Rail Crossing Reduction Project - EA Availability (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: FOUO

Hi Barbara,

Please see edits and comments to the Addendum, attached. Let me know if you'd like to discuss our input.

I've also attached copies of the Public Land Orders originally withdrawing the Dyke Range for military training purposes. I expanded the land ownership wording in the Addendum a bit. If you'd like more clarification, you can contact the BLM directly.

We appreciate your consideration of our comments.

Will you send us a final copy of the EA, Addendum, and FNSI?

Thanks,
Carrie

Carrie McEnteer
NEPA Branch Chief
Environmental Division
U.S. Army Garrison Fort Wainwright, Alaska
Phone: (907) 361-9507

-----Original Message-----

From: Barbara C. Hotchkin [mailto:Hotchkinb@akrr.com]
Sent: Friday, May 18, 2012 10:10 AM
To: McEnteer, Carrie L CIV USARMY IMCOM PACIFIC (US)
Cc: Chemi, Anne M CIV (US); Seibel, Clifford A CIV (US); Houpt, Douglas W CIV (US); Siftar, Kathleen D CIV (US); Sprau, Matthew H CTR (US); Jeanette Greenbaum; Brian Lindamood
Subject: RE: North Pole Road/Rail Crossing Reduction Project - EA Availability (UNCLASSIFIED)

Hi Carrie,

Thank you for your comments on the North Pole Road/Rail Crossing Reduction Project Environmental Assessment (EA). Per our discussion, ARRC's response to the USAG FWA comments is attached. I combined the comments on the tables you sent into one table, and added our responses. Also attached is a draft Addendum to the EA, and the figures that will be part of the EA Addendum. The Addendum provides more detail about the Dyke Range Impact Area and its past and current use, potential impacts on the area due to the proposed project, and environmental commitments and mitigation that was in the original EA. We believe it more clearly reflects our understanding of the complications associated with past use of Dyke Range.

Research by our engineering consultant indicates Dyke Range is owned by the US. Government (Bureau of Land Management). Is this correct? Is it owned by BLM, and under the management jurisdiction of U.S. Army Garrison Fort Wainwright? Please let me know how you would like this worded in the Addendum.

Please circulate this information internally for review and comment. We would be happy to make any necessary corrections and edits. You mentioned you would be unavailable most or all of next week. Perhaps we can set up a time today for a conference call for the week of May 28th to discuss any remaining concerns you may have, as we are under a tight timeframe. Call or e-mail if you have any questions about our responses to your comments or the Addendum.
Thanks, Barb

Barbara Hotchkin
Manager, Project Permits & NEPA
Alaska Railroad Corporation
327 W. Ship Creek Ave.
Anchorage, AK 99507
Phone: 907.265.2313
Fax: 907.265.3961

From: US [carrie.l.mcenteer.civ@mail.mil]
Sent: Wednesday, May 09, 2012 4:17 PM
To: Barbara C. Hotchkin

Cc: Chemi, Anne M CIV (US); Seibel, Clifford A CIV (US); Houpt, Douglas W CIV(US); Siftar, Kathleen D CIV (US); Sprau, Matthew H CTR (US)

Subject: RE: North Pole Road/Rail Crossing Reduction Project - EA Availability (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

One additional file.

-----Original Message-----

From: McEnteer, Carrie L CIV USARMY IMCOM PACIFIC (US)

Sent: Wednesday, May 09, 2012 4:16 PM

To: 'Barbara Hotchkin'

Cc: Sprau, Matthew H CTR (US); Seibel, Clifford A CIV (US); Houpt, Douglas W CIV (US); Siftar, Kathleen D CIV (US);

Chemi, Anne M CIV (US)

Subject: RE: North Pole Road/Rail Crossing Reduction Project - EA Availability (UNCLASSIFIED)

Importance: High

Classification: UNCLASSIFIED

Caveats: FOUO

Hi Barbara,

I'm hoping the ARRC will still consider USAG FWA comments, attached, as they provide important context in relation to USAG FWA property - Dyke Range. We apologize for the delay.

Very respectfully,

Carrie

Carrie McEnteer

NEPA Branch Chief

Environmental Division

U.S. Army Garrison Fort Wainwright, Alaska

Phone: (907) 361-9507

-----Original Message-----

From: Barbara Hotchkin [mailto:Hotchkinb@akrr.com]

Sent: Wednesday, March 21, 2012 2:20 PM

To: Barry Hooper; Bill Smyth; Robert A (DOT) Effinger; Bruce Campbell; Cynthia L (DEC) Heil; Debbie Maas; Dianna L (DNR) Leinberger; James Durst; Janice Wiegers; Joan Hardesty; Judy Bittner; Summer Rickman; Gary Foreman; Helfinstine, James; Donna J. Gardino; Jackson C. Fox; Jerry Cleworth; jconner@co.fairbanks.ak.us; Jennifer Schmetzer; mayor@co.fairbanks.ak.us; Michael Cox; Bernardo Hernandez; Paul Costello; Scott Johnson; Tom Hancock; Tami Sheehan; John Lohrey; Peter Forsling; Tim Haugh; Ethan Birkholz; Jennifer Curtis; Wayne Elson; Bill Gryder; Todd Boyce; Deborah Rocque; Bob Henszey; Limpinsel, Douglas CIV (US); Bill Butler; Douglas Isaacson; Ellen Lyons; Mark Sisinyak; McEnteer, Carrie L CIV (US); Houpt, Douglas W CIV (US); Meeks, Michael T CIV (US); Marcinkowski, Robert D CIV (US);

David Williams; John Schaaque; Palmer, Marcus D CIV (US); Wilson-Azelton, Mary T CIV (US); Colonel Reinhard Koenig; Tim Feavel

Cc: Bruce Carr; Jeanette Greenbaum; Brian Lindamood; Tim Sullivan; Stephenie Wheeler; John FRA Winkle; Heather Campfield; Jessica Christianson; Kristen Hansen

Subject: North Pole Road/Rail Crossing Reduction Project - EA Availability

Dear Interested Party:

The Alaska Railroad Corporation (ARRC) and the Federal Railroad Administration announce the availability of the Environmental Assessment (EA) for the proposed North Pole Road/Rail Crossing Reduction Project. You are receiving this email because you were identified as an interested party during the scoping process.

The EA is available for you to download and review via the project FTP site at <ftp://ardot:p3pp3r@ftpa.dowlhkm.com> <blockedftp://ardot:p3pp3r@ftpa.dowlhkm.com/> . If prompted for a username and password, use the following (note, both are case sensitive):

Username: ardot

Password: p3pp3r

In addition to the project FTP site, a copy of the EA is available for public review at the following locations:

- * Noel Wien Public Library
- * North Pole Branch Public Library
- * Fairbanks North Star Borough
- * City of North Pole Office

You are also invited to attend a public meeting to discuss the EA findings and the project's economic, social and environmental impacts:

Public Meeting

Thursday, April 5, 2012, 4:30 - 6:30 p.m. (Presentation at 5:30 p.m.)

Hotel North Pole, 449 N. Santa Claus Lane

The 30-day review and comment period will end on Wednesday, April 25, 2012. Written comments may be e-mailed to public_comment@akrr.com <blockedmailto:public_comment@akrr.com> or mailed to Alaska Railroad Capital Projects, P.O. Box 107500, Anchorage, AK 99510-7500.

Requests for a hard-copy of the document or a CD containing the EA and associated appendices may be directed to Jeanette Greenbaum at (907) 265-2440 or GreenbaumJ@akrr.com <blockedmailto:GreenbaumJ@akrr.com> .

Thank you for your interest in this project. Barbara Hotchkin

Barbara C. Hotchkin
Alaska Railroad Corporation
327 W. Ship Creek Ave.
Anchorage, AK 99501
Phone: (907) 265-2313
Fax: (907) 265-3961
hotchkinb@akrr.com

Classification: UNCLASSIFIED
Caveats: FOUO

Classification: UNCLASSIFIED
Caveats: FOUO
Classification: UNCLASSIFIED
Caveats: FOUO

Comment Response Matrix
North Pole Road/Rail Crossing Reduction Project
April 2012

Reviewer Names: Doug Houpt, Matthew Sprau, Carrie McEnteer
Reviewer Agency/Organization: Installation Range Office
Reviewer Telephone Number DSN: (317) 384-7516, 907-361-9688 Comm: (907) 384-7516
Reviewer Mailing Address: 724 Postal Service Loop, # 6300, Joint Base Elmendorf-Richardson, Alaska 99505-6300
Reviewer e-mail Address: douglas.w.houpt.civ@mail.mil, matthew.h.sprau.ctr@mail.mil, carrie.l.mcenteer.civ@us.army.mil

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
1.	Houpt	II	Acquire ROW	“Acquire right-of-way (ROW) and address utility relocations as necessary.” The US Army needs to have more details on how the proposed ROW will impact Army lands (current and future operations/restrictions) on the Dyke Range Impact Area. There is also a concern about unexploded ordnance (UXO) within the Dyke Range land.	Impacts on the Dyke Range Impact Area, including current and future operations/restrictions, are provided in a recently prepared EA Addendum.--
2.	Houpt	II	Alternative A: Alignment on the levee	If Alternative A locates the railroad track on top of the levee, then the Flood Control Levee Trail would have to be relocated. This also raises concern as to the impact on Army land and UXO concerns.	This is correct, and is one of the reasons Alternative A is not the proposed alternative.
3.	Houpt	III	Alternative C	Same concerns with this alternative as with alternative A. Encroachment (permanent) on the Dyke Range Impact Area.	Just as the Tanana River Levee, constructed in the 1970s, encroached on Dyke Range, so too would the proposed railroad embankment. The railroad embankment would be generally parallel to the Levee to minimize encroachment. Impacts are addressed in more detail in the addendum.
4.	Houpt	IV	Comparison of Alternatives	Overall, there are impacts to wetlands (12.5-20 acres). Are there impacts to Army wetlands (TBD acres)?	Please refer to Appendix E (Wetland Delineation/Vegetation Mapping and Functions and Values Assessment) and Appendix F (Wetland Impacts) for figures showing impacted wetlands on Army property. Wetlands impacts are also addressed in the addendum.
5.	Houpt	V	Land Ownership and Land Use	If the US Army loses access to the Dyke Range, the impact would be higher than “minor” for both alternatives.	The US Army would not lose access to the Dyke Range under either alternative. The gated at-grade crossing of the railroad near Dyke Road is identified as being for USACE and FNSB access to the Levee for flood control purposes. However, it could also be for the Army to access the portion of Dyke Range south of the Levee. This is clarified in the addendum.

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
6.	Houpt	2	Flint Hills Refinery	Per a TV announcement this morning (16 April 2012), the Flint Hills Refinery is scheduled to close? If this is true, what are the impacts on this EA? Wouldn't this reduce the amount of train traffic in the North Pole area.	The Flint Hills Refinery is scheduled to close a <u>portion</u> of the refinery (idling its No. 1 crude unit). The amount of fuel hauled, the number of cars in a train, and possibly the number of trains, will be reduced at least temporarily. A reduction in the number of trains does not negate the need for the project (see Section 1.2). Changes in volumes at Flint Hills are market driven, and Flint Hills has the capacity to roughly double the volumes presented in the EA. It is unclear if or how Flint Hills' April announcement will affect traffic long term.
7.	Houpt	2	Paragraph 1.3	The US Air Force has announced plans to move all of F-16 aircraft from Eielson to JBER. If this happens wouldn't this also be a reduction of train traffic to/from Eielson AFB?	As indicated in the response to Comment 6, a reduction in the number of trains does not negate the need for the project (see Section 1.2).
8.	Houpt	15	Comparison of Alternatives	Overall, there are impacts to wetlands (12.5-20 acres). Are there impacts to Army wetlands (TBD acres)??	See response to Comment 4.
9.	Houpt	35	Partial Take Parcels	Please delineate on a map the 30.50 acres of US Army land include in Alternatives A & C.	Refer to the attached addendum.
10.	Houpt	46	Table 3-13 Road Name Dyke Road	If the at-grade crossing on Dyke Road is eliminated, how would the US Army access the Dyke Range Impact Area?	The public at-grade crossing on Dyke Road will be eliminated, but a gated at-grade crossing will remain. See response to Comment 5. This gated at-grade crossing of the railroad near Dyke Road will allow access across the track for USACE and FNSB for flood control activities, and for the Army to access the portion of Dyke Range south of the Levee. This is clarified in the addendum.
11.	Houpt	48	Add a mitigation	US Army access to the Dyke Range Impact Area would be assured using existing roadways.	See response to comment 10 and the attached addendum. US Army access to Dyke Range will be assured during construction and operations.
12.	Houpt	56	Impacts and Mitigations	Are the safeguards stated in this paragraph sufficient to safeguard the US Army from liability and protect construction workers? If contamination or UXOs are encountered during the pre-acquisition survey, contact the Army POC for additional guidance.	This is addressed in the discussion of impacts in the addendum, and in the mitigation measures for Contamination, Contaminated Sites, and Unexploded Ordnance.

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
13.	Houpt	64	Contamination, Contaminated Sites, and UXO	Further investigation into possible contamination and presence of UXO may be conducted prior to property acquisition. Construction through the UXO area would require coordination with the U.S. Army, and potentially with USEPA and ADEC. -- These two sentences could place a large financial burden on the US Army. Need further internal staff discussion. If contamination or UXOs are encountered during the pre-acquisition survey, contact the Army POC for additional guidance.	See response to comment 12.
14.	Seibel		Pg VI	Table, Contaminated Sites: States there are contaminated sites "near" the routes, but indicates later that there are contaminated sites and UXO issues.	The table is only a summary, and we do not believe it is inconsistent with the body of the EA. However, additional information regarding the contaminated sites and UXO issue is included in the addendum.
15.	Seibel		Pg IX	Contamination, Contaminated Sites, UXO: Language indicates further investigation "may" be done. IF either route is chosen, they "will" have to do further investigation.	We concur that this language should be stronger, and have made that correction in the addendum. It states the work in the Dyke Range Impact Area will require a complete survey and investigation by certified unexploded ordinance (UXO) technicians.
16.	Seibel		Pg 5	Authority and NEPA Analysis: Indicates, correctly that we'd like to piggyback on their EA. Assuming it is done to our satisfaction. Also indicates that if there are issues that the EA will be upgraded to an EIS. With the contamination and munitions issues on Dyke Range, I don't really see how they think they will avoid an EIS.	FRA has indicated that it expects to issue a FONSI for the project. We do not believe the contamination and munitions issues on Dyke Range rise to the level of "significant impact." Clearly, to the extent that further investigation results in cleanup of such sites, there is a net benefit to the environment. As indicated in the addendum, should USAG FWA and BLM require any additional NEPA evaluation, ARRC will cooperate with that effort.
17.	McEnteer		II	Suggest expanding on how rights-of-way would be acquired.	Detailed information on how rights-of-way (ROW) would be acquired is not typically included in an EA, but additional information on this topic is provided in the addendum. We understand that ROW acquisition of military land will be complicated and requires considerable lead time, and will plan accordingly once funding is available for future project phases.
18.	McEnteer	1.6		Shouldn't the Army or USACE be listed as a federal land owner that would need to issue a ROW (i.e., Dyke Range?)	It is unclear that this time whether the process will be with BLM and USACE participating, USACE and BLM participating, or solely with either agency.
19.	McEnteer	2.1		Is there currently access over the levee as used by the military to access Dyke Range? If so, this access should be maintained.	Please refer to the response to comments 5 and 10.

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
20.	McEnteer	3.3.1		There is no mention of Dyke Range being an active military range.	It is mentioned on page 4 of the EA, but should have been mentioned again elsewhere in the document. This information is addressed in the addendum.
21.	McEnteer	Table 3-11		Suggest adding when clean-up/clearance of UXO w/in Dyke Range would occur.	We do not have a time frame for this as future work (design, permitting, ROW acquisition, and construction) are dependent on funding availability. Investigation of UXO w/in Dyke Range would occur during the design phase, and clean-up/clearance would need to occur prior to construction in that area.
22.	McEnteer	Figure 3-11		Dyke Range should be labeled.	Revised Figure 3-11 in the addendum shows Dyke Range.
23.	McEnteer	Figure 3-6		Suggest labeling military land (i.e., Dyke Range and Tanana Flats Training Area).	Revised Figure 3-6 in the addendum shows Dyke Range.
24.	Sprau		IX	The Dyke Range is USAG FWA owned land, this page states "construction through the USACE UXO area would require coordination with the US Army and potentially EPA an ADEC"	This statement is corrected in the addendum.
25.	Sprau		IX	Need to elaborate on the possibility of contamination and steps/policies followed that will result in lesser impacts	The addendum provides additional information on this topic.
26.	Sprau		8	This section should show aerial images for Alternative A and C with the cross sections. As it is now, the document is confusing as to the actual realignments being proposed (which are not presented until much later in the document)	The alternatives are described in Section 2.0 of the EA, and the analysis of potential impacts is presented later. We do not plan to modify this section, as no other reviewers, including cooperating agencies, expressed concerns about how Alternatives A and C were presented. However, the addendum provides additional information about the alignment through Dyke Range.
27.	Sprau	4	63	This section makes no mention of acquiring ROW through US Army owned land	Additional information on acquiring ROW through US Army owned land is including in the addendum.
28.	Sprau	Figure 3-6		This land use map shows the USAG FWA Dyke Range Impact Area as a Heavy Industrial Use Area. The area across the river (TFTA) is labeled as Military land which is correct. Shouldn't both of these areas be labeled the same since they are both Military land?	Refer to revised Figure 3-6 in the addendum.
29.	Sprau	Appendix D		These tables show the area (Dyke Range) owned by USAG FWA as having a Primary Use of "Vacant Land". I do not think this is the case, since this area is still considered an active training area. Suggest assigning a more appropriate primary use status.	The use of the land is addressed in the addendum.
30.	Sarah Runck		VII	Reseeding should be done using native species (non just non-invasive species).	The reseeding approach will be reevaluated in preparing the SWPPP for project construction, and we will consider your recommendation at that time.

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
31.	Sarah Runck		VII, 20	Dewatering may also require a pre-construction notification and permit from USACE, such as NWP 33, Temporary Construction, Access, and Dewatering.	The USACE participated as a cooperating agency in preparing the EA and did not mention the possible need for this permit. However, we will reevaluate the potential need for this NWP 33 during final design and permitting.
32.	Sarah Runck	3.2.1	26	The impact of these losses (wetlands) is considered minor.... Did they do a watershed analysis to determine what % of wetlands will be disturbed in the 6th level watershed (which is what the USACE Regulatory will likely do); also, close proximity to disturbed areas does not necessarily reduce the value or function of wetlands (sometime it increases value or function).	A 6th level watershed analysis was not completed, and is not typically done for NEPA documentation. However, this analysis may be conducted during permitting for the selected alternative. Throughout the corridor, the majority of wetland impacts are to forested and scrub shrub wetlands, which have low and medium functional values. As previously mentioned, the USACE participated in preparation of the EA as a cooperating agency, and was provided with a copy of Wetland Delineation/Vegetation Mapping and Functions and Values Assessment (EA Appendix E) and Wetland Impacts (EA Appendix F).
33.	Sarah Runck	3.4.3	59	The acreage of wetlands that would be permanently lost... Statement refers to surrounding area (very vague and leaves too much room for interpretation); it's more appropriate to address the impacts at a specific watershed-level.	There are many ways to assess impacts to wetlands. Discussions with the USACE, a cooperating agency, did not suggest the need for a watershed- level analysis. Notably, as documented in the addendum, there would be no impacts to wetlands within the proposed ROW through Dyke Range.
34.	Joe Malen		56	Should read "The UXO area on Fort Wainwright presents risk associated with abandoned vehicles, car batteries, buried and surface UXO, and discarded military munitions and munitions debris left by the Military"	This information is included in the addendum.
35.	Joe Malen		56	Should read "Construction through UXO and contamination area would require coordination U.S. Army	See response to Comment 15. The need for coordination with the USAG FWA is clearly stated in the addendum.
36.	Joe Malen		56	Should read "Spill clean-up equipment (e.g. oil-absorbment pads) and United Nations Performance Oriented Packaging containers for the contaminated material would be available on site during construction."	This statement is clarified in the addendum.
37.	Joe Malen		56	Should read "Short-term hazardous materials....would include implementation of spill-prevention...."	This statement is corrected in the addendum.
38.	Joe Malen		64	Should read "Construction through the UXO area and any chemical contamination would require coordination with the U.S. Army, USEPA, and ADEC.""	This statement is clarified in the addendum.

#	Reviewer	Page Number(s)	Section Number	Comment	ARRC Response to Comment
39.	Joe Malen		General	Contractor will be required to create, staff, and execute a contaminated sites work plan for all soil disturbing activities greater than 6 inches below existing surface.	As indicated in the addendum, we will conduct an environmental baseline survey to evaluate the potential for encountering contamination or hazardous materials during construction. ARRC also would develop an Environmental Project Management Plan that outlines contingencies for hazardous and contaminated waste management. During construction, excavation would be minimized to reduce risk, and we currently do not anticipate any excavation in this area.
40.	USAG FWA		General	<p>After reviewing the document, we feel that ARRC has not fully grasped the realities of the past use of this area and current status as an active Military Dudded Impact Area. We make no comments on the validity of the project, however we do want ARRC to be able to fully address potential encounters with UXO and contamination. The document does discuss the possibility of encountering UXO, however it is light on elaborating on methods of remediation.</p> <p>Based on the provided .pdf documents, we'd like the ARRC to add this to the EA:</p> <p>"The Dyke Range area was withdrawn from all forms of appropriation for use by the Department of the Army for military training purposes in 1957. Dyke Range is currently an active dudded impact area. Past use included direct firing by 105, 155, and 152 mm weapons and indirect firing by 4.2 inch mortars. It is likely that many other weapon systems and munition types were expended at this site for military training. Several clean-up actions have been performed since the area's original withdrawal including UXO discovery and disposal and debris removal associated with non-military illegal dumping."</p>	<p>ARRC does fully grasp the realities and complications associated with past use of Dyke Range. We hope this understanding is better reflected in the addendum, which more clearly addresses potential encounters with UXO and contamination. It acknowledges the need for cleanup/remediation, but still does not go into detail about specific remedial actions. That would be addressed in more detail in an Environmental Project Management Plan, which would outline contingencies for hazardous and contaminated waste management. ARRC would also develop a separate UXO management plan in coordination with the USAG FWA to outline procedures for identifying and properly managing UXO encountered during construction.</p> <p>This information is included in the addendum.</p>