

ALASKA RAILROAD CORPORATION



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Ms. Edrie Vinson
Environmental Project Manager
US Department of Transportation
Federal Highway Administration, Alaska Division
709 West Ninth Street, Room 851
PO Box 21648
Juneau, Alaska 99802

Re: Agency Comments on Proposed Knik Arm Crossing Project

Dear Ms. Vinson:

Thank you for the opportunity to comment at this stage of the process in the development of this important regional and state-wide significant transportation infrastructure project. The prospect of a Knik Arm Crossing ("Crossing") is the most important transportation infrastructure initiative affecting Southcentral Alaska since the construction of the Alaska Railroad and the completion of the Parks Highway.

The Alaska Railroad Corporation (ARRC) supports the development and construction of the Crossing. As the major landholder in the Ship Creek Industrial area the development of the Crossing is strategically important to our future. We look forward to continue dialogue with the project team as it develops the purpose and need statement, cumulative and secondary impacts, location, access and other aspects of this complex and sophisticated project.

Provided below are specific ARRC comments on the draft Purpose and Need Statement followed by additional issues we hope will be considered throughout the environmental study.

PURPOSE AND NEED

The development of a Purpose and Need Statement is the crucial first step in the project development phase. The draft statement provides a useful context for the development of the overall objectives of the Crossing. We would like to point out however, what we perceive as a critical flaw in the development of the Purpose and Need Statement. There is a great deal of discussion in the Project Background and the draft Purpose and Need Statement about "infrastructure", "transportation system(s)", "public transportation systems", "geographic and transportation context of the region", "intermodal transportation facilities", "intermodal transportation surface connectivity", and other numerous references to the existing transportation infrastructure in Southcentral. Yet, this is all done without once including the ARRC.

The ARRC moves approximately double the tonnage moving through the Port of Anchorage on an annual basis. This tonnage is the equivalent of several hundred thousand truckloads of

gravel, coal, refined petroleum products, heavy equipment, and other goods and services, which do not impact the current road infrastructure. An acknowledgement of the role and place of the railroad in a discussion of the regional transportation system is critical to pass any test of credibility.

A further concern regarding lack of reference to the Railroad's surface transportation significance and connectivity is the effect this may have on the justification for a future rail option across the Arm. The original "crossing" concept was developed by the Alaska Engineering Commission during the construction of the Alaska Railroad. The rail crossing option is just as valid today, perhaps more so, when considering the current national security climate, increased rail and vehicular traffic in the region, development of Port MacKenzie, expansion of the Port of Anchorage, increased interest in developing the state's natural resources and other considerations.

An acknowledgement in the Purpose and Need Statement to protect a future rail crossing does not diminish the need for the vehicular bridge. The Purpose and Need Statement is the perfect place to acknowledge the importance of a future rail crossing while stating that funding for such an undertaking is not currently available. This will preserve the concept of "intermodal connectivity" which is referenced throughout the document. This ensures that the current bridge will work in tandem and concert with a future rail crossing. The desire to protect a future rail crossing has been spoken about a number of times by KABATA and the Congressional Delegation supports the concept while acknowledging the lack of funding for a "full build-out".

More specifically, the Purpose and Need Statement, in Section 1.2 states: *"The purpose of the Knik Arm Crossing is to provide improved, **regionally significant** vehicular access and **intermodal surface transportation connectivity** between the Municipality of Anchorage and its Port of Anchorage/Ship Creek industrial area and the Matanuska Susitna Borough and its Port MacKenzie District with a financially feasible crossing to meet the **regional transportation infrastructure** needs ...".* The Crossing will not accomplish this without complete and full consideration of the necessary road connectivity on both sides of the bridge. Again in the same section under paragraph 2, unless connectivity in the Matanuska Susitna Borough is considered the Crossing will not meet its purpose and need.

Paragraph three of the same section discusses the need for redundant overland route access to regionally significant transportation centers for emergency response and evacuation. This further reiterates the importance of protecting a future rail crossing as railroads are considered by all mass evacuation plans as an expeditious means of moving large amounts of people at any given time and the railroad serves all the major ports, airports, military bases and population centers in Southcentral.

In Section 1.2.1 (2) a reference is made in the second paragraph that "containerized throughput grew approximately 1,370,300 metric tons in 1996". Total tonnage through the Port was 3,000,000 tons. Please reference what year(s) the increase of 1.3 million tonnes was compared to.

Further, in Section 1.2.1(2) paragraph three, truck traffic to and from the Port of Anchorage is expected to increase "by at least 50 percent" within the next ten to twelve years. We suggest this is a by-product of the rail not being on the bridge. Rail movement of trailers/containers in the lower 48 transportation system is one of the fastest growing segments of rail traffic. Increased congestion on the nation's highways, lack of drivers and increased demands for safety has fostered a partnership among railroads and the trucking industry to the benefit of

both. Again, this is an opportunity for the Purpose and Need to protect the option of a future rail crossing by acknowledging the critical role rail plays in the movement of freight goods and services.

In Section 1.2.1(2) paragraph five (page seven) starting with “The Matanuska Susitna Borough is developing its Port MacKenzie in ways that are largely complementary to the Port of Anchorage” is another opportunity to point out the future role a rail crossing will play in the regional transportation system. Bulk commodities historically move by rail. Coal, gravel, mineral resources, timber and other bulk commodity movement are strengths of the rail mode. Port MacKenzie is perfectly suited for such a role and the Matanuska Susitna Borough has acknowledged rail’s importance to its future by completing the “Matanuska Susitna Road Rail Corridor Study” in 2004.

Section 1.2.1(3) discusses the need for redundant overland routes for emergency ingress and egress to regional airports, ports, military bases, etc. Again, the ARRC is totally ignored in the discussion. In fact, the statement “*Currently, there is only one primary and continuous north-south transportation corridor in the region, the Glenn Highway*” is incorrect. There are two continuous north-south modes, the highway and the railroad. The railroad connects all three Southcentral main ports, Anchorage, Whittier, and Seward, as well as all three main military installations and the regional airport. The report again has the opportunity to acknowledge the importance of the rail mode to the regional transportation system and support the opportunity for a future rail crossing.

Section 1.2.1(3) paragraph 5, refers to the hazardous nature of goods shipped through the Port of Anchorage and by the ARRC. We suggest again this is the perfect opportunity to support a future rail crossing. However, we caution about references to tsunamis as this will impact the use of the proposed Knik Arm Bridge and a potential future rail crossing in the event of an emergency caused by a tsunami (the current infrastructure will more likely be utilized if such an emergency occurs).

In summary, we believe the Purpose and Need Statement will be strengthened by including references and support for all modes of surface transportation, vehicular, rail, air and marine. We are trying to build a regional transportation infrastructure system in which all modes will play a part. The Mat-Su Borough ferry will be on-line in 2006/2007 as the initial component of this regional system. We expect the vehicular bridge to be next. In our opinion, the economic impetus these two legs of the regional infrastructure system will create in the MSB will further increase the need and desire for a rail crossing which is certainly foreseeable in the next thirty years. We do not believe the inclusion of rail as a critical infrastructure feature of the regional transportation system in any way diminishes the Purpose and Need for the vehicular bridge. In fact, it bolsters the argument for the vehicular bridge because of the need to carry an increased burden of regional and statewide commerce until such time as a rail crossing can be built to carry its fair share.

FUTURE RAIL ACCESS AND BRIDGE:

Because surface transportation includes rail to the Port of Anchorage and is necessary to support Port MacKenzie and its future plans for rail connectivity, the project should be designed to enable a future separate rail bridge. We request the project consider the following:

- Preserve options to gain elevation for approaches that serve an eventual rail crossing.

- Consider how the railroad would gain access to a future rail span on the Anchorage side and how this would impact the current project? How would it impact the Port of Anchorage project?
- Consider what the Mat-Su Borough's desires are for Port MacKenzie and future rail access from the Mat-Su side?
- Consider future ROW designations: Identify and preserve railroad ROW for approaches on the Anchorage and Port MacKenzie sides. Identify and preserve railroad ROW for eventual connection with the proposed joint road/rail corridor to Willow as identified by Mat-Su Borough Rail Corridor Study.

SPECIAL STUDIES:

- Consider conducting traffic impact studies that predict the impact of additional traffic on the Ship Creek area especially in light of future projects including the Mat-Su Borough Ferry and the ARRC intermodal facility.
- Consider a future rail bridge when conducting technical studies including but not limited to hydrology, location and soil condition. For example, hydrology and hydraulics should be designed and conducted with an understanding that a separate rail bridge could be added in the future.

RAIL YARD AND PROPERTY:

- KABATA project must consider impacts on railroad operations and the Anchorage yard to ensure that the ARRC can maintain maximum flexibility for future operating needs.
- If extension of Ingra/Gamble is contemplated, then KABATA must consider ways to preserve the integrity and flexibility of the Anchorage yard. Support structures such as piers and on/off ramps must be carefully considered to accommodate current and future railroad considerations
- ARRC terminal operations are currently affected by a large number of public road/rail at-grade crossings, traffic congestion, and fixed immovable objects like the "C" Street pier structure that affect operating efficiency. KABATA project must identify and mitigate any additional impacts on ARRC operations.

RAILROAD TENANT IMPACTS:

- ARRC has lease parcels on Government Hill and throughout its 600-acre Anchorage Terminal Reserve located primarily in the Ship Creek region. The ARRC and KABATA must coordinate to identify and mitigate impact on these lands.
- ARRC understands that KABATA represents unique opportunities for ARRC leaseholders. ARRC and KABATA need to coordinate to maximize this opportunity.

POTENTIAL BUSINESS & COMMUNITY IMPACTS:

ARRC may experience the following business impacts as a result of a shorter highway connection to the Parks Highway. This in turn could have unintended consequences for neighborhoods exposed to increased truck traffic.

- ARRC intermodal traffic may suffer from a competitive disadvantage with the trucking industry due to the shorter connection to the Parks Highway.
- The bridge may become a major gravel truck generator in the City of Anchorage.
 - ARRC Gravel business may be impacted through competition introduced by trucks generating gravel from the Matanuska-Susitna Borough.
 - The MSB is currently leasing out the gravel rights at Port MacKenzie
 - If truck haul replaces train haul from the valley, this will generate an additional 100,000 round trip trucks per season, or 550 trucks each way per day (30 trucks per hour/18 hour day, one truck every two minutes across the bridge) for a 180 day hauling season.
 - The additional gravel trucks would have significant impact to downtown Anchorage traffic, affecting local freight, goods, and services distribution.
 - The additional gravel trucks would have significant impact to neighborhoods in Anchorage that are located near the gravel companies (QAP).

TRAFFIC IMPACTS RELATING TO ARRC LANDS AND OPERATIONS (ANCHORAGE SIDE):

- Ship Creek's local road system is already overloaded and dysfunctional...how will the bridge impact or improve this current situation?
- The area around the toe of Government Hill and into the Port of Anchorage is already constricted and congested. What effect will the bridge have on Port of Anchorage traffic and businesses? Will alternative Port access be developed off the new access to the bridge, reducing the congestion below Government Hill?
- How does the Bridge interface with planned POA Expansion Project? Is POA Expansion Project being adjusted to tie roads/rail into Bridge/connecting roads?
- What effect will the bridge have on Government Hill traffic and businesses?
- The bridge accomplishes nothing without connecting ground transport arteries; therefore:
 - Which agency(s) are looking into connecting roads to the bridge?
 - Where is proposed Bridge-to-Anchorage connection corridors located?
 - How would the Bridge-to-Anchorage corridor connect to existing highways/streets?
- What will the impact be on the ARRC's operating lands and yard if an Ingra/Gamble tie in is considered?

ROUTE THROUGH THE PORT AREA:

- If the route comes through the Port of Anchorage area, port traffic patterns should be considered as it relates to businesses interruptions and impact at the port.
- A new rail spur is being built around the back of the port area – Is this being considered in the context of route choices and connectivity?

- The crossing approach is not mentioned in the Port of Anchorage expansion project scope.

In closing, the Alaska Railroad supports development of the Knik Arm Crossing and believes it is in the long-term best interest for our state and our region to improve the surface transportation infrastructure. We appreciate the opportunity to share our comments and are available to provide further detail as the project unfolds.

Sincerely,

Bruce Carr
Director, Strategic Planning

CC: Management Committee
ROW Committee