

Alaska Railroad Corporation

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August 31, 1998

Ms. Susan Wick
Environmental Team Leader
DOT/PF, Central Region
P.O. Box 196900
Anchorage, Alaska 99519-6900

Re: Seward Highway Passing Lanes & Pathway
Bird Point to Potter Section House
Project No. 53577

Dear Ms. Wick:

The ARRC has many concerns/objections to the above project. Our primary concern is safety of public, our passengers and our employees. The north side of Turnagain Arm is a railroad/highway transportation corridor. Introduction and development of non-transportation uses, such as a recreational pathway, are fundamentally inconsistent with the overriding basic use of the transportation corridor.

As evidence of this, we offer an incident with one of our trains on May 30, 1998 at 10:12 am:

“2006 S, Whittier passenger train (218 passengers on board), reports about 12 windsurfers on the main track in the blind curve at ARRC MP 91.8 (Windy Corner). If train had been going track speed, it would have struck wind surfers....”

Unfortunately, this incident is not unusual and the situation has been getting much worse. It is especially bad in areas where the Seward Highway has developed pull offs, such as Windy Corner and Beluga Point.

We recognize that a pathway will be created from Bird Point to Potter Section House. We think that the creation of a safe pathway will be the greatest technical challenge faced on the project. If sufficient design effort and supporting construction funds are not dedicated to the pathway, then we believe the recreational users of the pathway will be exposed to unreasonable hazards. The ARRC asks that:

- 1) In project scoping, the requirements for safe pathway construction be carefully considered. A safe pathway along Turnagain Arm may require considerably more area, separation, or disturbance than pathways in other areas.

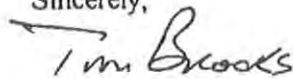
- 2) The pathway's objective is to provide a continuous trail from Anchorage to Girdwood. Other portions of the trail have only been recently constructed, some will be constructed in 1999. The project scope should be broad enough to address trail segments beyond Bird Point and Potter. Where additional safety improvements are needed in these adjacent areas, based on actual experience, the project scope should be broad enough to accommodate them.
- 3) In the areas where recreational facilities and other enhancements exist or are planned, safe egress across the tracks will be required. The existing known trouble areas must be addressed (Beluga Point, Windy Corner, Indian ballfields, and Bird Creek) and the new areas developed by the project must be carefully assessed and protected.
- 4) The design criteria for the pathway be carefully researched and thought out. DOT is breaking new ground and existing design guidelines may not apply. For example, the ARRC hauls hazardous materials at higher track speeds in this corridor. Should derailment hazards be evaluated as a criteria for pathway design?

We also have other areas of concern. The project will require track realignments. It is important that track curvatures not be increased, and where possible track curvature should be decreased. Track curvature relates directly to train speed and derailment potential. Rip rap protection of our track is also important in realigned areas. We are concerned that realigned track may increase our rip rap maintenance requirements.

Much of the project will be done on the ARRC right of way. Our right of way corridor is valuable and we are concerned that the project be constructed so as not to impair the right of way's value. For example, we currently have two fiber optic cables in the right of way.

Thank you for the opportunity to comment. We look forward to working with you on the project.

Sincerely,



Thomas E. Brooks, P. E.
Chief Engineer