

ALASKA RAILROAD CORPORATION

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June 16, 2004

Ms. Kaja Brix
Assistant Regional Administrator
National Marine Fisheries Service
Box 21668
Juneau, Alaska 99802

Subject: Cook Inlet Beluga Whale Conservation Plan

Dear Ms. Brix:

The Alaska Railroad Corporation (ARRC) was not aware of, and therefore, did not attend the planning meeting conducted by the National Marine Fisheries Service (NMFS) on May 25, 2004 regarding the Cook Inlet Beluga Whale Conservation Plan. We recently became aware of comments made by participants at the meeting suggesting that noise generated by the Alaska Railroad along Turnagain Arm is one of the human-induced factors potentially impacting beluga recovery. This letter specifically addresses that statement, and also provides comments of a more general nature on the proposed Conservation Plan.

ARRC is a self-sustaining, full-service railroad serving ports and communities from the Gulf of Alaska to Fairbanks. Although the railroad has been owned by the State of Alaska since 1985, ARRC is required by statute to be self-sustaining, and receives no operating funds from the State. Income generated is used to provide a higher level of service to the public, maintain and improve the State's transportation infrastructure, and otherwise foster and promote economic development as envisioned by ARRC's governing statutes. Trains are operated on railroad tracks adjacent to portions of Turnagain Arm and Knik Arm, as they have been for the past 80 years. However, we do not believe ARRC's operations have the potential to adversely affect the recovery of beluga whales in Cook Inlet.

Noise Generated by the Alaska Railroad

We can find no basis for the statement by workshop participants that noise generated by the Alaska Railroad along Turnagain Arm may be one of the human-induced factors potentially impacting beluga recovery. There is no information, study or research to indicate that noise generated by the Alaska Railroad (or noise generated by any other source) has impacted the beluga population or poses a threat to its recovery. In fact, NMFS-sponsored research suggests just the opposite for noise associated with certain industrial activities. The report prepared for NMFS entitled "Acoustic Measurement in Cook Inlet, Alaska During August 2001" (dated August 12, 2002) states that:

Beluga whales are able to hear an unusually wide range of frequencies, covering most natural and man-made sounds. However, where their hearing is keenest (10-100 kHz) is above the frequency range of most industrial noise, and at low frequencies (<100 Hz) beluga hearing threshold levels may be comparable to or exceed one-hertz band levels recorded for the industrial activities reported in this study. Therefore, the sound levels measured in Cook Inlet during this study would not be expected to have more than a minor effect on the whales.

The study conducted for NMFS did not specifically address train noise. However, ARRC is nearing completion of a noise and vibration study along a 4-mile segment of its track in Anchorage, a portion of which is adjacent to Cook Inlet. Although the results of ARRC's study are not directly comparable to the study conducted for NMFS, some basic train noise and vibration data is presented here for your information.

In ARRC's study, the highest ambient noise level (24-hour period) from a monitoring location adjacent to Cook Inlet was 71 dBA (measurement taken 60 feet from the railroad track). The maximum noise level (107 dB) occurred during the short period of time when a train (SD70 locomotive) sounding its horn passed by. Horns are sounded at at-grade crossings and other locations as necessary for safety reasons in accordance with State and/or Federal requirements. Preliminary modeling results of proposed track improvements, including an increase in the number of trains, show no adverse effect on nearby residents, with the exception of a few locations near at-grade crossings. Additionally, the study showed that beyond distances of 150 feet in sandy soil and approximately 300 feet in clay and peat, ground-borne vibration associated with trains is not perceptible to residents.

As you would expect, noise and vibration levels associated with trains decrease as the distance from the track increases. Any noise generated by Alaska Railroad trains along Turnagain Arm has a limited contribution to the noise environment beluga whales experience. Also, during the transmission of sound from air to water, a large amount of the acoustic energy is reflected. We believe the potential for noise and vibration generated by the Alaska Railroad to impact the beluga whale population or its recovery is extremely low. Therefore, we do not believe development of a conservation strategy in the Conservation Plan associated with ARRC operations is warranted.

General Comments on the Proposed Conservation Plan

ARRC supports sound conservation of fish, marine mammals, and their habitats. We hope development of a Conservation Plan that identifies the specific factors causing the beluga population decline, establishes goals, and recommends strategies promoting recovery succeeds in increasing the beluga population. However, a number of speculative human-induced factors potentially impacting beluga recovery were identified at the May 25, 2004 meeting. ARRC urges NMFS to eliminate any superfluous or speculative topics from further consideration as the Conservation Plan is developed. We recommend that NMFS focus the Conservation Plan on the issues for which studies or research have shown a link between the issue and the beluga's population decline, and where effective strategies to promote the recovery of beluga whales can be identified and implemented.

Thank you for the opportunity to submit comments on the development of the Conservation Plan for the Cook Inlet beluga whale. Please contact me at (907) 265-2313 if you have questions or require additional information.

Very truly yours,



Barbara C. Hotchkin
Permits & NEPA Specialist

cc: Barbara Mahoney, NMFS