

## OEA'S SUMMARY OF MAJOR CONCLUSIONS

On December 5, 2008, Alaska Railroad Corporation (ARRC or the Applicant) filed a petition with the Surface Transportation Board (STB or the Board) pursuant to 49 U.S. Code (U.S.C.) § 10502 for authority to construct and operate approximately 31 to 46 miles of rail line to connect the Port MacKenzie District in the Matanuska-Susitna Borough (MSB) to a point on the existing ARRC main line between Wasilla and just north of Willow, Alaska. Referred to as the Port MacKenzie Rail Extension, the proposed rail line would provide a rail connection for freight services between Port MacKenzie and Interior Alaska.

ARRC has stated that the purpose of the proposed rail line is to provide rail service to Port MacKenzie and to connect Port MacKenzie with the existing ARRC main line, providing Port MacKenzie customers with rail transportation between Port MacKenzie and Interior Alaska. The Applicant believes that by creating a rail connection with Port MacKenzie, the proposed rail line would make the development of natural resources in Interior Alaska, including the coal, limestone, timber, and metallic mineral resources along the existing ARRC main line corridor more economically feasible. The proposed project would support ARRC's statutory goal to foster and promote long-term economic growth and development in Alaska. In support of this goal, the state has appropriated a total of \$62.5 million for the MSB to support the design, environmental documentation, and permitting of the proposed rail line.

The Board is the agency responsible for granting the authority to construct and operate proposed rail lines and associated facilities. Accordingly, the Board, through its Office of Environmental Analysis (OEA), formerly known as the Section of Environmental Analysis (SEA)<sup>1</sup>, is the lead agency responsible under the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332, for preparing this Environmental Impact Statement (EIS) to identify and evaluate potential environmental impacts associated with the proposed action and alternatives. The U.S. Army Corps of Engineers (USACE), Federal Railroad Administration (FRA), and U.S. Coast Guard cooperated in the preparation of the EIS.

Section 10901(c) of the ICC Termination Act of 1995 directs the Board to grant rail line construction proposals "unless" the Board finds the proposal "inconsistent with the public convenience and necessity."<sup>2</sup> Thus, Congress has made a presumption that rail construction projects are in the public interest unless shown otherwise. If the Board decides the proposed rail line is inconsistent with the public convenience and necessity, the Board will deny the proposed action. In making its final decision, the Board will consider the entire environmental record (including unavoidable impacts) as well as the transportation merits of the proposed rail line.

OEA has conducted an extensive review of the potential beneficial and adverse environmental impacts that could result from construction and operation of the proposed rail line. Based on the information to date; consultation with Federal, state, and local agencies; input provided by a

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<sup>1</sup> Subsequent to the close of the comment period on the Draft EIS, the Section of Environmental Analysis became the Office of Environmental Analysis. Thus, the Final EIS refers to the Board's environmental staff as OEA.

<sup>2</sup> Although the statute does not define the term "public convenience and necessity," historically a three-part test has been used to evaluate that term: whether an applicant is financially fit to undertake proposed construction and provide the proposed service; whether there is public demand or need for the proposed service; and whether the proposal is in the public interest and will not unduly harm existing services.

wide variety of organizations and citizens of Alaska; and its own independent environmental analysis, OEA has reached the following conclusions:

- 1) OEA examined 12 build alternatives and the No-Action Alternative in the Draft and Final EISs. With the exception of the No-Action Alternative, which would not meet the purpose and need for this proposed rail line construction and operation, each of the build alternatives would result in substantial environmental impacts.
- 2) The U.S. Environmental Protection Agency (USEPA) and other commenters have questioned the need for the proposed rail line. OEA asked ARRC to provide more information regarding purpose and need, which it did on August 3, 2010. OEA has set forth these concerns and ARRC's information in this Final EIS.
- 3) If the Board – the decisionmaker in this case – approves ARRC's proposal after weighing the transportation merits and environmental impacts, OEA recommends that the Board approve the build alternative that OEA concludes is environmentally preferable: the Mac East Variant-Connector 3 Variant-Houston-Houston South Alternative. OEA believes that this alternative, with OEA's final mitigation recommendations, would most effectively avoid, minimize, and reduce potential environmental impacts to the extent reasonable. OEA has reached this conclusion for the following reasons:
  - flat topography needing little cut and fill
  - 1 of 2 alternatives with the fewest overall water crossings (25 versus 26 to 51 for other alternatives), proposed drainage structures (2 versus 3 to 7), and culvert extensions (2 versus 3 to 13), and one of the fewest numbers of proposed culverts (19 versus 17 to 33)
  - a comparatively low level of both floodplain acres (4 versus less than 1, 26, or 27) and floodplain and potential floodplain crossings (7 versus 5 to 11)
  - third lowest amount of wetland and water acreages disturbed (160 versus 137 to 318)
  - second lowest amount of habitat acreage disturbed (651 versus 608 to 822)
  - 1 of 4 alternatives with the fewest fish-bearing stream crossings (10 versus 13 to 18), and 1 of 2 alternatives with the fewest anadromous stream crossings (5 versus 6 to 9)
  - 1 of 2 alternatives with the lowest estimated index of upstream fish habitat potential (70,600 versus 75,500 to 271,400)
  - lowest number of known cultural resources potentially affected (15 versus 16 to 49) and a low probability for cultural resources
  - only 1 structure (versus 0 to 11) and no residences or businesses (versus 0 to 6) taken within the 200-foot right-of-way (ROW)
  - a moderate number of officially recognized trails crossed (8 versus 5 to 11) and a low number of Iditarod Dog Sledding Historic District contributing trails crossed (2 versus 1 to 6)

- does not cross a state recreation or refuge areas (versus 0 to 4)
- 4) OEA is recommending approximately 100 mitigation measures to reduce environmental impacts to a wide array of resource areas, including water, biological, recreational, and cultural. This recommended mitigation would require the Applicant to secure appropriate Federal and state permits and to abide by the reasonable requirements of those permits.
- 5) OEA anticipates, however, that notwithstanding OEA's final recommended mitigation, adverse impacts could still occur to resource areas. The largest potential impacts would occur to surface water, wetlands, fisheries, cultural and historic resources, and parks and recreation resources. The only means to completely avoid these potential impacts would be for the Board to deny the proposed action. Based on its independent environmental analysis and review of all public and agency comments, OEA recommends the Board require the Applicant to implement the mitigation measures set forth in Chapter 19 of this Final EIS, which includes all of the Applicant's voluntary mitigation measures and OEA's additional recommended mitigation measures, as conditions in any final decision approving the proposed action. The recommended mitigation for and potential unavoidable impacts to the resource areas mentioned above are as follows:
  - To avoid or minimize the potential environmental impacts to surface water from the proposed rail line, OEA is recommending that the Board impose 28 mitigation measures, including 10 measures volunteered by the Applicant. These measures include requiring: acquisition of appropriate Federal and state permits; mitigation of unavoidable impacts to surface water; avoidance and minimization of impacts to wetlands and waters of the United States; maintenance of natural water flow and drainage; design of bridges and culverts over fish-bearing waters to meet National Marine Fisheries Service (NMFS) requirements; limitation of construction in anadromous streams during low-flow conditions and following other Alaska Department of Fish and Game (ADF&G) timing recommendations to the extent practicable; utilization of best management practices imposed by the USACE; marking of stream channels prior to snowfall; removal of debris from waterbodies at rail line crossings; construction of project-related winter roads to avoid water quality degradation; consultation with the USACE on gravel mining within the limits of ordinary high water; and compliance with appropriate regulations governing hazardous substances and potential contamination.

Notwithstanding the recommended mitigation measures, there still would be potential unavoidable impacts to surface water from the proposed rail line. Potential impacts would include: potential changes to natural drainage and altered flood hydraulics near crossings; increased potential for debris jams and overbank flooding upstream of water crossings; reduced floodplain area; increased scour and bank erosion at crossings; and increased turbidity, sediment loads, and concentrations of pollutants during construction.

- To avoid or minimize the potential environmental impacts to wetlands from the proposed rail line, OEA is recommending that the Board impose up to 9

mitigation measures, including 3 measures volunteered by the Applicant and 1 alternative-specific mitigation measure. These measures include requiring: acquisition of appropriate Federal and state permits; measures to mitigate unavoidable impacts to wetlands, including mitigation of impacts to the Su-Knik Mitigation Bank; avoidance and minimization of impacts to wetlands and waters of the United States; construction designed to maintain natural water flow and drainage; utilization of best management practices imposed by the USACE; and removal of debris from wetlands and waters at rail line crossings.

Notwithstanding the recommended mitigation measures, there still would be potential unavoidable impacts to wetlands within and adjacent to the proposed rail line ROW. Potential impacts would include: unavoidable filling of wetlands; permanent loss of wetland functions within the fill area; potential changes to natural drainage and altered flood hydraulics near crossings; increased potential for debris jams and overbank flooding upstream of water crossings; changes to recharge potential and aquifer dewatering; impacts to the Su-Knik Mitigation Bank; and impacts to Goose Creek Fen (for alternatives that include the Big Lake Segment). As discussed in the mitigation measures, the Applicant would be required to provide compensatory mitigation for unavoidable impacts to wetlands and waters of the United States. This could include utilizing wetland banks or creating new wetlands. Though wetland acreage and functionality could be compensated, functionality from an existing system would be lost. If wetland creation is required as part of the permitting process, a created wetland at a different site might not have the same ecological value as the wetlands being filled.

- To avoid or minimize the potential environmental impacts to fisheries from the proposed rail line, OEA is recommending that the Board impose 28 mitigation measures, including 12 measures volunteered by the Applicant. These measures include requiring: acquisition of appropriate Federal and state permits; maintenance of natural water flow and drainage by installing bridges and equalization culverts; minimization of temporary stream crossings and stream disturbance; design of bridges and culverts for fish-bearing waters to meet NMFS requirements; limitation of construction in anadromous streams during low-flow conditions and following other ADF&G timing recommendations to the extent practicable; utilization of best management practices imposed by the USACE; removal of debris from wetlands and waters at rail line crossings; inspections of culverts to ensure fish passage; implementation of Essential Fish Habitat conservation measures; minimization of detonation impacts to fish-bearing waters; and prior written authorization to narrow an anadromous waterbody within mean high water.

Notwithstanding the recommended mitigation measures, there still would be potential unavoidable impacts to fisheries from the proposed rail line. Potential impacts would include: fish habitat loss and modification at stream crossings along the proposed rail line; loss of rearing, foraging, and cover habitat along the banks within the rail line footprint; loss of overhanging bank habitat structure and

vegetation within the rail line footprint; potential changes to natural drainage and altered flood hydraulics; potential for debris jams and overbank flooding upstream of water crossings; potential direct mortality of fish during construction; and potential loss of redds, eggs, and fry due to changes in sedimentation, turbidity, and pollutants during construction.

- To avoid or minimize the potential environmental impacts to cultural and historic resources from the proposed rail line, OEA is recommending that the Board impose 3 mitigation measures, including 2 volunteered by the Applicant. These measures include requiring: compliance with a Programmatic Agreement (PA); the identification of trails to be given grade-separated crossings within the historic district; and development of protocols to inform construction supervisors of the importance of protecting and identifying cultural resources discovered as rail line construction takes place.

Because all effects on historic properties cannot be fully determined prior to approval of this type of undertaking, OEA has developed a PA. A PA is a mechanism under section 106 of the National Historic Preservation Act that allows agencies to fully evaluate which properties are listed in or eligible for listing in the *National Register of Historic Places* and would govern the completion of the section 106 process if the proposal before the Board is authorized and the rail line is built. The PA provides for the completion of a Level 2 identification survey,<sup>3</sup> if the Board authorizes the project and the locations of associated rail line facilities have been established. Additionally, the PA establishes responsibilities for the treatment of historic properties, the implementation of mitigation measures, and ongoing consultation efforts.

OEA held a meeting and teleconference for interested parties on October 21, 2010 to discuss the draft PA, which had been published in the Draft EIS. In response to comments received during and after this meeting, as well as on the Draft EIS, OEA revised the PA accordingly. On February 10, 2011, OEA distributed the revised PA to the consulting parties for comment and held a teleconference on February 24, 2011 to discuss comments on the revised PA. OEA accepted comments on the revised PA until March 10, 2011 and anticipates distributing the PA for signature on April 1, 2011.

Notwithstanding the recommended mitigation measures, there still would be potential unavoidable impacts to cultural and historic resources from the proposed rail line. Potential impacts would include: the potential damage to archaeological sites in the rail line ROW and footprint through surface and subsurface disturbances; potential loss of and changes to access within the ROW; and the introduction of auditory and visual effects depending on the resource and location. The Iditarod Dog Sledding Historical District would be adversely affected to varying degrees through loss of visual integrity, potential loss of and changes to

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<sup>3</sup> Level of investigation required to evaluate the eligibility of a resource for the National Register.

access within the ROW, and changes to traditional or culturally significant use of and connection to the property.

- To avoid or minimize the potential environmental impacts to parks and recreation resources from the proposed rail line, OEA is recommending that the Board impose up to 13 mitigation measures, including 4 measures volunteered by the Applicant and 4 alternative-specific mitigation measures. These measures include requiring: restoration of public lands to their former use or original condition; maintenance of a public information Web site during construction; warning devices to notify boaters of bridge construction; creation of a plan to identify officially recognized trails, appropriate timeframes for construction and temporary access points; the design of bridges to accommodate winter modes of transportation; grade-separated trail crossings with an average distance of 3 miles between crossings; ROW acquisition in conformance with appropriate Federal and state regulations; minimization of impacts to the Susitna Flats Game Reserve, Point MacKenzie Trailhead, Figure 8 Loop Trail, Nancy Lake State Recreation Area, Little Susitna State Recreation River, Willow Creek State Recreation Area, and Nancy Lake Creek Junction public use site; preparing a report on any officially recognized trails that the Applicant proposes to relocate; and identification of trails to be given grade-separated crossings within the historic district.
- Notwithstanding the recommended mitigation measures, there still would be potential unavoidable impacts to parks and recreation resources from the proposed rail line. Potential impacts would include: diminished experience for users engaged in activities such as recreation, hunting, fishing, and wildlife viewing; a loss of connectivity of trails for which grade-separated crossings would not be provided; the conversion of lands within the rail line ROW to rail line use; and the restriction of access within the ROW without an ARRC entry permit.

There also would be potential unavoidable impacts to section 4(f)<sup>4</sup> and 6(f)<sup>5</sup> properties, depending on alternative. Construction and operation of the following 8 alternatives would result in greater than *de minimis* impacts on recreational 4(f) properties: the Mac West-Connector 1-Willow; Mac East-Connector 3-Willow;

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<sup>4</sup> Section 4(f) of the U.S. Department of Transportation Act of 1966, 49 U.S.C. § 1653(f) and later recodified as 49 U.S.C. § 303, mandates that the Secretary of Transportation shall not approve any transportation project requiring the use of publicly-owned parks, recreation areas, wildlife or waterfowl refuges, or significant historic sites, regardless of ownership, unless (1) there is no prudent and feasible alternative to using that land and (2) the program or project includes all possible planning to minimize harm to the public park, recreation area, wildlife or waterfowl refuge, or significant historic site, resulting from that use. Section 6009(a) of the “Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users” Act (23 U.S.C. § 138) established that requirements of section 4(f) shall be considered to be satisfied if the Secretary of Transportation determines that the impact would be *de minimis*. Section 4(f) does not apply to the Board, an independent agency, but does apply to the FRA, one of the cooperating agencies for the EIS.

<sup>5</sup> Section 6(f) of the Land and Water Conservation Fund, 16 U.S.C. § 4601, applies to all public areas that have received Conservation Fund monies to acquire or develop public recreation facilities. Section 6(f)(3) requires that these areas (properties) be maintained in perpetuity for public outdoor recreation use, unless the National Park Service approves substitution property of reasonably equivalent usefulness and location and of at least equal fair market value.

Mac East Variant-Connector 3 Variant-Willow; Mac West-Connector 1-Houston-Houston North; Mac East-Connector 3-Houston-Houston North; Mac East Variant-Connector 3 Variant-Houston-Houston North; Mac West-Connector 1-Houston-Houston South; and Mac West-Connector 2-Big Lake alternatives. The section 4(f) properties include the Willow Creek State Recreation Area, the Nancy Lake State Recreation Area, the Little Susitna State Recreation River, and the Susitna Flats State Game Refuge, depending on the alternative authorized, if any. A portion of the Nancy Lake State Recreation Area, a section 6(f) property, would be permanently converted from recreational to non-recreational uses in the event that either the Mac West-Connector 1-Willow, the Mac East Variant-Connector 3 Variant-Willow or the Mac East-Connector 3-Willow alternatives were authorized by the Board.

In sum, OEA has identified the Mac East Variant-Connector 3 Variant-Houston-Houston South Alternative as its environmentally preferable alternative for the proposed rail line. This alternative has been selected as environmentally preferable because it would have the least impacts to topography, water resources (including wetlands), biological resources, cultural and historic resources, and land use. OEA anticipates, however, that notwithstanding OEA's final recommended mitigation, adverse impacts could still occur to resource area. The largest potential impacts would occur to surface water, wetlands, fisheries, cultural and historic resources, and parks and recreation resources.

## READER'S GUIDE

This Final Environmental Impact Statement (EIS) evaluates the potential environmental effects that could result from the construction and operation of the proposed Port MacKenzie Rail Extension. It is organized in a manner consistent with National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) NEPA implementing regulations at 40 Code of Federal Regulations (C.F.R.) § 1502.10. This Final EIS is intended to provide clear and concise information on the proposed action and alternatives to agency decisionmakers and the public.

This Final EIS is a republication of the Draft EIS, with modifications. Comments on the Draft EIS and responses to those comments are provided in Chapter 23 of this Final EIS. Substantive modifications to the Draft EIS in this Final EIS are indicated by change bars in the left-hand margins of each chapter and appendix. A list of the principal substantive changes to the document is included at the end of this guide. This Final EIS describes the proposed action and alternatives, existing environmental conditions, and potential environmental impacts associated with the proposed action and alternatives. The Table of Contents lists chapters and specific topics within chapters to help readers find topics of interest. The Table of Contents lists tables and figures numerically by the chapter in which they appear. The Index at the end of the main body of this Final EIS more specifically identifies the locations of topics of interest. Appendices are lettered and are provided in alphabetical order after the main body of this Final EIS. The vast majority of readers received this Final EIS on CD. The remaining readers received a bound copy of the Final EIS (main body only) and a CD at the back of the document containing the main body and all of the appendices.

Analyses in this document address proposed activities associated with construction and operation of the proposed rail line and associated facilities and their potential environmental impacts, as appropriate. This Final EIS addresses potential direct and indirect impacts from construction and operation of the proposed rail line and associated facilities, and for the No-Action Alternative, the potential impacts of not implementing the proposed action. Direct and indirect impacts were analyzed for the 12 build alternatives considered for detailed study and the No-Action Alternative. Impact areas addressed include topography, geology and soils; water resources; biological resources, cultural and historic resources; subsistence; climate and air quality; noise and vibration; energy resources; transportation safety and delay; navigation resources; land use; socioeconomics; and environmental justice.

This Final EIS also addresses potential cumulative impacts to the environment that could result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such actions.

Chapter 19 of this Final EIS presents the Office of Environmental Analysis's (OEA's) final recommended mitigation measures. Most of the recommended mitigation measures in this Final EIS appeared as preliminary or voluntary mitigation measures in the Draft EIS. However, as explained further in Chapter 19, OEA has modified and deleted some mitigation measures from the Draft EIS and has also added some new mitigation measures in this Final EIS.

OEA's final recommended mitigation is arranged by environmental resource area. No mitigation is included for the environmental resource areas discussed in the EIS where OEA concluded that the impacts would be negligible (energy resources, socioeconomics, subsistence, and environmental justice). OEA is recommending mitigation for every waterbody crossing, every officially recognized and/or historic trail crossing, and for some unofficial trail crossings to maintain connectivity within the project area. OEA also recommends mitigation to maintain waterbody access and connectivity and to minimize impacts to resident and anadromous fish species.

## **SUBSTANTIVE CHANGES SINCE THE DRAFT EIS**

The following is a list of substantive changes within this Final EIS based on comments on the Draft EIS:

- 1) CEQ NEPA implementing regulations (40 C.F.R. § 1502.14(e)) require an agency to identify its preferred alternative in the Final EIS, if it has not already done so in the Draft EIS. After extensive evaluation of the potential impacts associated with each of the alternatives, OEA has identified the Mac East Variant-Connector 3 Variant-Houston-Houston South Alternative as its environmentally preferable alternative for the proposed rail line.<sup>1</sup> OEA believes that this alternative, when combined with OEA's final mitigation recommendations, would most effectively avoid, minimize, and reduce potential environmental impacts to the extent reasonable if the Surface Transportation Board (STB or the Board) decides to authorize the construction and operation of the proposed rail line. OEA notes however, that notwithstanding OEA's final recommended mitigation, some adverse impacts would still occur to recreational access, wetlands, anadromous fisheries, and other resource areas. The only means to completely avoid these potential impacts would be for the Board to deny the proposed action. In making its final decision, the Board will consider the entire environmental record (including these unavoidable impacts), as well as the transportation merits of the proposed rail line.
- 2) In comments on the Draft EIS, the Applicant submitted information on potential wetland impacts based on the anticipated footprint (area to be disturbed) rather than the right-of-way (ROW) for the proposed rail line. In response, OEA requested, and the Applicant provided, the anticipated rail line footprint in geographic information system (GIS) format. In this Final EIS, OEA has reviewed and used the anticipated footprint rather than the ROW in assessing the potential impacts to topography, geology, and soils and biological and water resources from the proposed rail line. For all of the alternatives analyzed in the Draft EIS, use of the footprint rather than the ROW reduced the estimate acreage potentially affected by the proposed rail line; the reductions vary from approximately 20 to 40 percent depending on the resource and

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<sup>1</sup> The cooperating agencies (the U.S. Army Corps of Engineers, Federal Railroad Administration, and U.S. Coast Guard) have not identified an environmentally preferable alternative at this time, but may do so in separate Records of Decision.

alternative. In general, analysis of impacts based on the footprint rather than the ROW did not result in large changes in the relative potential impacts of the alternatives, with the notable exception of the Mac East-Big Lake Alternative that would affect the smallest amount of habitat based on the ROW, but would affect the third largest amount of habitat based on the footprint.

- 3) In response to comments on the Draft EIS, OEA asked the Applicant to consider the feasibility of an alternative through the Port MacKenzie Agricultural Project in the vicinity of the north-south section line to the east of Guernsey Road and an existing rail line easement. The Applicant filed information regarding such a variant of the Mac East Segment and OEA independently evaluated it. OEA decided to include analysis of the Mac East Variant Segment in this Final EIS (and is recommending it as part of OEA's environmentally preferable alternative here), because the potential impacts generally would be similar to or less than the potential impacts of the Mac East Segment or the Mac West Segment. In particular, the Mac East Variant Segment would result in reduced potential impacts to wetlands, land use along Point MacKenzie Road, and property owned by Cook Inlet Region, Incorporated. The Mac East Variant Segment would result in increased impacts to private property (129 acres within the ROW) and lands with agricultural covenants (141 acres with the ROW) compared to the Mac East Segment (79 and 91 acres within the ROW, respectively).
- 4) In response to comments on the Draft EIS, OEA considered the feasibility of routes near the Susitna River to the west of the Willow Segment and between the Big Lake Segment and Knik Goose Bay Road, which commenters suggested could maximize avoidance of waters of the United States and represent the least environmentally damaging practicable alternative (LEDPA) under the Clean Water Act permitting regulations (40 C.F.R. § 230.10(a)). OEA considered information provided by the Applicant and conducted an independent analysis. OEA concluded that a route along the Susitna River would be longer and more difficult to construct and would result in greater potential impacts to wetlands than a route incorporating the Willow Segment. OEA also concluded that a route east of the Big Lake Segment would be impractical because substantially greater amounts of cut and fill would be required even if the track grade were doubled from 0.5 percent to 1 percent. In addition, such a route would require taking approximately twice as many residences as the Big Lake Segment. This information has been included in Chapter 2 of this Final EIS.
- 5) In response to comments asserting that the Draft EIS lacked sufficient fisheries data, OEA conducted a GIS geomorphic analysis to estimate upstream habitat potential for selected fish species to enhance the comparison of potential anadromous and resident fisheries' impacts among the alternatives. The results are included in this Final EIS and indicate that alternatives that include the Willow Segment would have by far the greatest potential impact to fisheries and alternatives that include the Houston South Segment would have the least potential impact to fisheries.
- 6) In response to comments, OEA has provided a more detailed analysis of visual resources in this Final EIS. OEA found that the potential visual impacts would be associated with altered views in the Point MacKenzie Agricultural Project and would be similar for the 3 southern segments. Of the northern segments, the Willow Segment would have the largest potential impact on visual resources as a result of

passing through 3 state recreation areas and a game refuge. The Houston South Segment would avoid recreation areas and refuges and would have the least potential impact on visual resources.