



Safer Seward Highway Project  
Seward Highway MP 98.5 to 118,  
Bird Flats to Rabbit Creek  
Project No.: Z566310000/0A31034

# Environmental Assessment

*Appendix S: Section 4(f) Evaluation*

**DRAFT**

December 2025

Prepared for:

*Alaska Department of Transportation and Public Facilities*

Prepared by:

HDR, Inc.  
582 E. 36th Avenue, Suite 500  
Anchorage, AK 99503-4169  
907-644-2000 Phone | 907-644-2022 Fax

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## **Acronyms and Abbreviations**

ACWR	Anchorage Coastal Wildlife Refuge
ADA	Americans with Disabilities Act
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AHRS	Alaska Heritage Resource Survey
APE	Area of Potential Effects (for historic properties evaluation)
ARRC	Alaska Railroad Corporation
AS	Alaska Statute
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CSP	Chugach State Park
CSPMP	<i>Chugach State Park Management Plan</i>
dB	decibel(s)
DMLW	Division of Mining Land and Water
DOT&PF	Alaska Department of Transportation and Public Facilities
DPOR	Alaska Division of Parks and Outdoor Recreation, housed within ADNR
EA	Environmental Assessment
FHWA	Federal Highway Administration
Forest Service	U.S. Department of Agriculture, Forest Service
HLB	Heritage Land Bank
INHT	Iditarod National Historic Trail
LWCF	Land and Water Conservation Fund
MOA	Municipality of Anchorage
MP	Milepost
mph	mile(s) per hour
NPS	National Park Service
NRHP	National Register of Historic Places
OWJ	Official(s) with Jurisdiction
Project	Safer Seward Highway Project (Seward Highway MPs 98.5 to 118, Bird Flats to Rabbit Creek)

ROW	right-of-way
RS	Revised Statute
RV	recreational vehicle
SHPO	State Historic Preservation Office or Officer (also known as the Alaska Office of History and Archaeology, which is housed within DPOR)
SWG	Stakeholder Working Group
TDM	Transportation Demand Management
TSMO	Transportation System Management and Operations
U.S.C.	U.S. Code
USDOT Act	U.S. Department of Transportation Act of 1966
WOTUS	Waters of the United States

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# 1 Introduction

The Alaska Department of Transportation and Public Facilities (DOT&PF) is proposing to realign and construct safety improvements to the Seward Highway from Mileposts (MP) 98.5 to 118, Bird Flats to Rabbit Creek, also known as the Safer Seward Highway Project (Project). The Project lies entirely within the Municipality of Anchorage (MOA), Alaska, and includes the communities of Rainbow, Indian, and Bird.

DOT&PF is developing the Project using a combination of State of Alaska and Federal-Aid Highway Program funds administered by the Federal Highway Administration (FHWA). For ease of reading, the Project is typically described both herein and in the Project's Environmental Assessment (EA) from north to south.

The Project vicinity and overview are depicted on Figure 1-1 and Figure 1-2, respectively.

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## **Section 4(f) Maps**

Maps referenced in the text throughout this report are in a mapbook series included in Appendix A.

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Figure 1-1. Project vicinity



Figure 1-2. Project overview



## 1.1 Section 4(f) Legal Background

Section 4(f) was enacted in 1966 as part of the U.S. Department of Transportation Act of 1966 (USDOT Act), which established the U.S. Department of Transportation. It is now codified in 49 U.S. Code (U.S.C.) 303(c); and appears in Title 23 Code of Federal Regulations (CFR) 138. Title 23 CFR 774 contains Section 4(f) implementing regulations for the FHWA, Federal Transit Administration, and Federal Railroad Administration.

As FHWA is providing funding for the Project, it is an undertaking subject to compliance with Section 4(f). For the purposes of Section 4(f), DOT&PF has assumed FHWA's responsibilities, and is acting as lead federal agency pursuant to 23 U.S.C. 327 and a Memorandum of Understanding between the FHWA and DOT&PF dated April 13, 2023.

Section 4(f) prohibits use of certain parks, recreation areas, wildlife refuges, or historic properties (i.e., cultural resources listed or eligible for listing in the National Register of Historic Places [NRHP]) for transportation projects unless there is "no prudent and feasible alternative" or the impacts are "*de minimis*." This document further explains the law and analyzes properties within the Project area protected by Section 4(f) and the impacts to those resources that the Project<sup>1</sup> would cause.

Section 4(f) of the USDOT Act (49 U.S.C. 303) states:

(c)...the Secretary [of Transportation] may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if—

- (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 park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

In accordance with 23 CFR 774.3:

The Administration may not approve the use, as defined in [§ 774.17](#), of Section 4(f) property unless a determination is made under paragraph (a) or (b) of this section.

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<sup>1</sup> Some information in this document is based on the report titled, *Section 4(f) Property Identification*, included herein as Appendix B.

(a) The Administration determines that:

(1) There is no feasible and prudent avoidance alternative, as defined in [§ 774.17](#), to the use of land from the property; *and*

(2) The action includes all possible planning, as defined in [§ 774.17](#), to minimize harm to the property resulting from such use; *or*

(b) The Administration determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a *de minimis* impact, as defined in [§ 774.17](#), on the property. (*emphasis added*)

Federal regulations at 23 CFR 774.17 define a “de minimis impact” as follows:

(1) For historic sites, *de minimis* impact means that the Administration has determined, in accordance with [36 CFR part 800](#) that no historic property is affected by the project or that the project will have “no adverse effect” on the historic property in question.

(2) For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

This document identifies, describes and evaluates Section 4(f) resources as well as the impacts of the proposed alternatives, alternatives that could avoid use of, and reasonable measures to minimize harm to these resources.

## 1.2 Project Purpose and Needs Summary

The summary presented herein is based upon a more detailed purpose and need description in the Project’s EA Chapter 1 Purpose and Need and Appendix C *Project Purpose and Need*.

### 1.2.1 Project Purpose

The Project’s purpose is to improve safety by reducing crash rates and severity, improve mobility and reliability, and safely accommodate mixed uses within the corridor.

### 1.2.2 Project Needs

This is a safety project driven by three interrelated needs:

- **Need 1: Reduce crash rates and crash severity.** In 2006, this stretch of the Seward Highway was designated as the state’s first Highway Safety Corridor. Despite additional enforcement presence, community education, improved signage, and safety improvement projects, high crash rates and crash severity issues remain. Crashes are caused by limited passing opportunities, curvy and constrained road geometry, and poor access management. Extreme driving conditions—including atmospheric (high winds, rain, snow, and dark conditions) and road surface (wet, icy, snowy, and changes that occur at the freeze-thaw line)—increase the risk of drivers losing control and sliding off

the road or into oncoming traffic. Due to heavy summer seasonal traffic volumes, drivers spend considerable time following vehicles without safe passing opportunities, resulting in frustrated drivers making high-risk passing maneuvers and increasing the risk of head-on collisions.

- **Need 2: Improve mobility and reliability.** Highway traffic mobility refers to the ability of people and goods to move effectively and efficiently through the transportation network, and it is measured using several metrics: follower density, level of service, free flow speed, and segment density (see EA Appendix E *Highway Configuration Development and Selection Memorandum*). Mobility for vehicular users within the Seward Highway corridor begins to fail during summer weekend peaks. Summer traffic volumes can result in long platoons (i.e., lines) of vehicles. When vehicles slow to turn or pull over for scenic or wildlife viewing, these actions pulse back through the lines, causing variable speeds. Mobility is also degraded by high truck and recreational vehicle (RV) volumes; uncontrolled access to and from scenic turnouts and trailheads, driveways, and intersections; and difficult weather and road conditions. Reliability addresses how predictable travel experiences would be on the highway. Crashes, vehicle breakdowns, and poor weather or road conditions can cause unexpected delays, which reduces reliability. Emergency lane or road closures following collisions, rockfall, or avalanches cause miles- and hours-long backups since no alternative road routes exist through the Project area. Access to the emergency location is limited by the two-lane facility, slowing the response times of emergency services in the event of lane closure or backup. Mobility for bicyclists and pedestrians is limited as there are non-motorized facilities along less than 30 percent of the highway corridor within the Project area.
- **Need 3: Safely accommodate mixed uses in the corridor.** The Project corridor's multitude of scenic, natural, and recreational attractions contribute to the highway's designation as a National Forest Scenic Byway, All-American Road, and Alaska Scenic Byway. However, the popularity of the attractions alongside—and including—the road exacerbates the safety, mobility, and reliability issues. The need exists to maintain the corridor's scenic qualities while safely accommodating the needs of all users, including recreators and tourists accessing attractions, local residents accessing their homes and communities, commercial and through-travelers making long-distance trips, and bicyclists and pedestrians. Numerous access points to pullouts and private driveways mean that vehicles are making many turning movements throughout the corridor. Vehicles pulled onto the highway shoulders create safety hazards. Gaps in non-motorized pathways result in people biking and walking along or across the highway to access attractions, creating safety and mobility issues.

### 1.3 Description of the Proposed Action

This section summarizes the Proposed Action, which is discussed in greater detail in the EA Chapter 2 Alternatives).

The Proposed Action would reconstruct the Seward Highway between MPs 98.5 and 118 to be a four-lane divided highway with a 55-mile-per-hour (mph) design speed. A separated, multi-use pathway would be constructed along the full corridor length.

The Project termini are based on areas where the highway substantially changes character. Between MPs 98.5 and 118, the Seward Highway is a two-lane facility (one lane in each direction) with numerous curves. Southeast of MP 98.5 to Girdwood and Portage, the highway has long, straight stretches; broad curves; and alternating passing lanes (i.e., primarily a three- or four-lane highway). North of MP 118, the Seward Highway is a divided, limited-access, multi-lane freeway through South Anchorage.

The Proposed Action would result in the highway meeting current design standards, providing a consistent and safer experience for all highway users. Other safety features of the Proposed Action are the construction of frontage roads at the Bird and Indian communities, and substantial consolidation of points of entry and exit from the highway, reducing conflict points. The Proposed Action includes a continuous, paved, multi-use pathway along the full corridor segment length that would safely accommodate non-motorized uses in the corridor as well as make viewpoints and the adjacent state park more accessible by non-motorized users. The pathway would extend the Indian to Girdwood Bike Path from Indian to Rabbit Creek Road at the northern terminus of the Proposed Action. The exact location of the multi-use pathway will be determined during final design, and it may switch sides of the highway along the length of the Project. The Proposed Action would include a pedestrian crossing over the Alaska Railroad Corporation (ARRC) tracks at Beluga Point. The tracks would be realigned within certain areas to accommodate the expanded, straightened highway footprint.

## **1.4 Other Alternatives Considered**

In the Project's EA, DOT&PF evaluates the environmental consequences of the Proposed Action and No Action alternatives. To determine the Proposed Action, DOT&PF undertook preliminary engineering that included multiple alternative concepts that it ultimately determined would not satisfy the Project purpose and need and/or would result in unreasonable costs to the public. EA Chapter 2 (Alternatives) and Appendix D *Alternatives Development Memorandum* further describe alternatives considered and dismissed from further evaluation. EA Appendix E *Highway Configuration Development and Selection Memorandum* and Appendix G *Traffic and Safety Analysis* further address these topics.

See Section 4 Avoidance Alternatives for a discussion of potential alternatives to avoid Section 4(f) properties.

## **1.5 Overview of Section 4(f) Properties within the Project Area**

As outlined in Section 1.1, Section 4(f) applies to significant publicly owned parks, recreation areas, and wildlife and waterfowl refuges, and to publicly or privately owned historic sites eligible for or listed on the NRHP. The Project corridor traverses two very large Section 4(f) properties: the Anchorage Coastal Wildlife Refuge (ACWR) and Chugach State Park (CSP). The DOT&PF and ARRC transportation corridor rights-of-way (ROWs) traverse these properties throughout the 20-mile Project corridor. Figure 1-1 and Figure 1-2 illustrate these properties in the context of other designated state and federal parks as well as wildlife refuges within the greater Turnagain Arm area.

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In addition to ACWR and CSP, multiple historic sites listed or eligible for NRHP listing (i.e., historic properties) are located within the Project corridor. The full list of Section 4(f) properties within the Project corridor is as follows:

- Anchorage Coastal Wildlife Refuge (ACWR), including Ggeh Betnu Trail, Lot 178, and Lot 205 outside the ACWR boundary, and refuge access points located within the Seward Highway ROW
- Chugach State Park (CSP), including the Indian to Girdwood Bike Path, municipal parklands managed as part of CSP (e.g., Bird Creek Regional Park), Potter Section House interpretive site, and park access points and recreation features located partly or fully within the Seward Highway ROW
- Historic sites eligible for or listed in the NRHP (note, the number in parentheses following the site name is the Alaska Heritage Resource Survey [AHRS] number for that site):
  - Potter Section House State Historic Site (ANC-00075)
  - Indian Valley Trail (Iditarod National Historic Trail) (SEW-00143)
  - Prehistoric Archaeological Site ANC-00054
  - Prehistoric Archaeological Site ANC-00078
  - Turnagain Arm District, Alaska Railroad (ANC-04057/SEW-01613)
  - Indian Valley Mine (SEW-00412)
  - Diamond Jim's Sign (SEW-01379)
  - Garage, Storage Shed, and Residence (SEW-01567; eligibility pending)

DOT&PF documented decisions about Section 4(f) applicability of CSP, ACWR, and multiple sites and features associated with these park and refuge properties in a document titled, *Section 4(f) Property Identification* (see Appendix B). A unique characteristic of this Project is that multiple parking areas, trailheads, trails, boardwalks, rock climbing crags, overlooks, and other park and refuge access points are located in whole or in part within DOT&PF's Seward Highway ROW. Appendix B provides an assessment of all features that could be construed as park- or refuge-related and documents DOT&PF's determinations for features that Section 4(f) law protects.

The Project's EA, Appendix Q Section 106 Consultation/Findings contains multiple desktop and field survey reports as well as documentation for Alaska State Historic Preservation Office (SHPO) consultation; these are collectively referred to herein as the "cultural reports." The cultural reports document which historic properties within the Project's Area of Potential Effects (APE) are in, or eligible for listing in, the NRHP, and contain DOT&PF's finding of no adverse effect to historic properties by the Proposed Action. To protect potentially sensitive archaeological and historic sites, the cultural reports are not available to the public, but are on file with DOT&PF and the State of Alaska Office of History and Archaeology. Information about historic properties is summarized in Appendix B and this document.

In addition to features located within the highway ROW, the Ggeh Betnu Trail and the parcels of state-owned land (Lot 178 and Lot 205) through which the trail passes lie outside the legislative boundary of the ACWR but are managed by the Alaska Department of Fish and Game (ADF&G) to provide refuge access. Similarly, a parcel that was donated to the Alaska Department of

Natural Resources (ADNR) for the ACWR lies adjacent to but outside its legislative boundary. For purposes of this document, DOT&PF considers the trail and these parcels to be part of the larger ACWR, and they are afforded protection under Section 4(f).

Similarly, MOA owns lands that the ADNR, Division of Parks and Outdoor Recreation (DPOR) manages as part of CSP. DOT&PF considers these lands to be part of the whole of CSP, and they are afforded protection under Section 4(f). These lands include Bird Creek Regional Park, which is MOA-owned, park and recreation land within the community of Bird, and certain parcels of MOA Heritage Land Bank land near the communities of Indian and Bird that contain the Indian to Girdwood Bike Path. Refer to Appendix B for more information on these properties.

## 2 Description of Section 4(f) Properties

This chapter provides information about each Section 4(f) property within the Project area. The *Section 4(f) Property Identification* document in Appendix B provides further detail.

### 2.1 Anchorage Coastal Wildlife Refuge

#### 2.1.1 Overview

**Location and Map Reference:** Seward Highway MPs 115.3 to 117.6; Appendix A Mapbook, pages 1 through 5.

**Section 4(f) Property Type:** Wildlife or Waterfowl Refuge

**Size:** 32,476 acres (ADF&G 1991)

**Ownership/Management** State of Alaska/ADF&G, Division of Wildlife Conservation, and ADNR, Division of Mining Land and Water (DMLW). DOT&PF consulted with ADF&G, Division of Wildlife Conservation as the Official with Jurisdiction (OWJ) for this facility.

**Public Access:** The ACWR maps show 13 access points throughout the refuge. Within the Project area, primary access points are Rabbit Creek Shooting Park (large parking lot), North Potter Marsh Visitor Facility/Boardwalk (large parking lot), three ACWR Wildlife Viewing Pullouts along the eastern side of the Seward Highway bordering Potter Marsh, and South Potter Marsh Visitor Facility/Boardwalk (large parking lot). The Ggeh Betnu Trail is a relatively new community access trail to the North Potter Marsh Facility/Boardwalk that does not yet appear on maps.

#### 2.1.2 Activities, Features, and Attributes

The 32,476-acre ACWR is largely intertidal habitat for shorebirds and water birds. It includes extensive unvegetated mudflats and lushly vegetated wetlands with fringes of forest habitat. For humans, it provides opportunities for bird watching, hunting, walking, skiing, photography, and other recreational activities. Features include the Rabbit Creek Shooting Park, an extensive viewing boardwalk at the northern end of Potter Marsh, and pullouts and parking spots for access to Potter Marsh. A second boardwalk is under construction at the southern end of Potter Marsh.

#### 2.1.3 Relationship to Other Similar Lands within the Vicinity

No other designated wildlife refuges are within the Project area. Across the mouth of Turnagain Arm is the federal Kenai National Wildlife Refuge. Across Knik Arm are other state refuges, including the Susitna Flats State Game Refuge. Other natural areas include CSP, which abuts the ACWR at Potter Marsh at the refuge's southern end and the newly established Potter Marsh Watershed Park, which abuts the southeastern corner of the refuge, across the Old Seward Highway.

## 2.1.4 Ownership Agreements

The ACWR manages the habitat on some municipal lands within the refuge boundaries by agreement. Several access points and the boardwalk occur partly or wholly in the transportation ROWs, and there are agreements for some of them.

## 2.1.5 Unusual Characteristics

An unusual characteristic associated with the ACWR is the presence of refuge facilities located outside the legislative boundaries of the refuge but managed as part of ACWR and, therefore, afforded Section 4(f) protection. These are the pullouts, boardwalk, trail, and access points described earlier. Except for portions of the Ggeh Betnu Trail and parcels of state land that the trail crosses (Lots 205 and 178), these are within the DOT&PF Seward Highway ROW. Also, certain ACWR resources fall entirely or partially within the DOT&PF or ARRC ROW but are considered part of the Section 4(f)-protected ACWR, such as the Rabbit Creek Shooting Park parking lot, North Potter Marsh Visitor Facility/Boardwalk, three ACWR Wildlife Viewing Pullouts, and the South Potter Marsh Visitor Facility/Boardwalk parking lot.

## 2.2 Chugach State Park

### 2.2.1 Overview

**Location and Map Reference:** CSP is located mostly within the MOA (ADNR-DPOR 2016). The park's westernmost boundary lies in the western foothills of the Chugach Mountain Range and is 7 miles east of Downtown Anchorage. It is further defined by Knik Arm and the Knik River on the north, Turnagain Arm on the south, and Upper and Lower Lake George as well as the Chugach National Forest on the east (ADNR-DPOR 2016). See Figure 1-1 and Figure 1-2, and Appendix A, pages 4 through 25.

**Section 4(f) Property Type:** CSP is a park designated by the Alaska Legislature.

**Size:** The park encompasses approximately 495,000 acres (ADNR-DPOR 2016). The park is approximately 30 miles wide east to west, and its maximum north-south dimension is more than 30 miles.

**Ownership/Management:** ADNR-DPOR owns and manages CSP. The *Chugach State Park Management Plan* (CSPMP), citing state law at Alaska Statute (AS) 41.21.122, states that the management responsibility of the park is assigned to ADNR for control, development, and maintenance, and DOT&PF is responsible for the repair and maintenance of all existing public roads within CSP (ADNR-DPOR 2016:1). The CSPMP specifies that the control of highway access and roadside structures within CSP is ADNR's responsibility, and ADF&G cooperates with ADNR for park purposes that are relevant to their duties (e.g., fish habitat, wildlife).

DOT&PF considers ADNR-DPOR the OWJ for all facilities in CSP. Several facilities are owned by other entities; for these facilities, ADNR-DPOR is one of the OWJs and the facility/landowner is the other OWJ. These cases are noted below.

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ARRC has a ROW through the southwestern part of CSP, typically 100 feet on either side of its track centerline. The legal ROW follows the original track alignment; therefore, the tracks do not fall in the center of the 200-foot-wide ROW where the track has been realigned.

DOT&PF has a highway ROW through CSP from points south of the Project terminus to MP 115, where the highway leaves CSP. The ROW is generally 150 feet on either side of the highway centerline. As with the ARRC corridor, the legal ROW reflects an older highway alignment and has not always been updated within areas where the highway has been shifted or straightened. Where the highway corridor overlaps ARRC ROW, DOT&PF and ARRC have agreements in place for DOT&PF to operate and maintain the highway on the ARRC ROW. This results in highway ROW widths of less than 300 feet in many segments of the Project area.

Per agreement with the MOA, ADNR-DPOR has taken management responsibility for MOA's Bird Creek Regional Park and manages it as part of CSP. ADNR-DPOR essentially has full decision-making and managerial control, and the CSP OWJ has stated they do not normally coordinate with the MOA about the park. For these reasons, it is considered part of CSP for Section 4(f) purposes. More information is provided in Appendix B.

Potter Section House is the CSP headquarters, and its grounds include interpretive materials, a retired rotary snowplow locomotive on display, public parking, latrines, and landscaping. These facilities occur within an area that ADNR-DPOR uses under a long-term lease from ARRC. ADNR-DPOR has leased the parcel since the late 1980s. The Section House itself, along with historic outbuildings and immediate grounds, are listed in the NRHP. The historic site grounds overlap with this site's "park" boundaries, but they are not identical. See also Section 2.3 for more information about this area as a historic site.

**Public Access:** CSP has trailheads, campgrounds, and other facilities within the Project corridor as well as multiple formal and informal access points, all stemming from the Seward Highway. CSP has identified a recreation development zone that follows the highway corridor and surrounds the Indian and Bird communities. The recreation development zone recognizes the concentrated recreation facilities and access within the area (ADNR-DPOR 2016: Figure 6). Many park features overlap the Seward Highway ROW; these features are provided in Section 3.2.2 and Appendix B.

### **2.2.2 Activities, Features, and Attributes**

Within the Project area, the park has the access noted above as well as the Turnagain Arm Trail (hiking, running) and the paved Indian to Girdwood Bike Path (popular for cycling) that parallel the highway. Other hiking trails are perpendicular to the Seward Highway. People surf the bore tide and kite surf on Turnagain Arm (part of CSP). Salmon fishing is popular in Bird Creek. Rock climbing occurs on rock cuts along the Seward highway and on natural rock outcrops. For many, driving for pleasure on the Seward Highway is a park experience and includes observing Dall sheep, beluga whales, salmon, eagles and other birds, and the general mountain and ocean views.

### 2.2.3 Relationship to Other Similar Lands within the Vicinity

Abutting CSP at the northern side of the Turnagain Arm Planning Unit is the ACWR and Potter Marsh, which offer public access to wildlife, wildlife habitat viewing, and education. Near where the Seward Highway reaches Girdwood (MP 90), CSP abuts Chugach National Forest, which has large expanses of backcountry trails, campgrounds, and natural areas. Chugach National Forest lands are also across Turnagain Arm, southward from the park. Bird Creek Regional Park is MOA-owned park and recreation land that is adjacent to and within CSP lands, and ADNR-DPOR manages it by agreement as part of CSP. The next nearest other state park areas are within the Matanuska-Susitna Borough, north and east of Anchorage.

### 2.2.4 Ownership Agreements

Agreements are in place for many of the park features that occur within the highway ROW, and agreements exist between CSP and MOA for management of some of its undeveloped lands, including Bird Creek Regional Park.

### 2.2.5 Unusual Characteristics

The CSP's founding legislation (AS 41.21.121) declares "all state-owned land" within the park boundaries to be part of the park. All state-owned land, taken literally, would include the ARRC and DOT&PF ROWs. However, these transportation agencies and CSP have considered both ROWs to be separate for most purposes, with interagency agreements that acknowledge and allow for park facilities within the ROWs. No legal document exists that comprehensively establishes the ownership and management authorities within this corridor. For this Project, DOT&PF is making a good-faith effort to describe park features, including some for which no agreement exists, and a reasonable judgment about which of the features within the ROW are protected by Section 4(f).

## 2.3 Potter Section House State Historic Site

**Location and Map Reference:** Potter Section House is located at Seward Highway MP 115 at the southern end of Potter Marsh; see Appendix A, pages 4 and 5.

**Section 4(f) Property Type:** Potter Section House (ANC-00075) is a historic property that is listed in the NRHP. It is the last railroad section house in existence along the Alaska Railroad. It was nominated for NRHP listing under Criterion A for its association with the Alaska Railroad, according to the cultural reports. It is also associated with the Iditarod National Historic Trail (INHT). The 1.5-story, wood-frame building was built in 1929, and has been restored and preserved. The site is open to the public and immediately off the western side of the Seward Highway. No public access is currently available for historical interpretation of the Potter Section House interior; however, the main room includes limited interpretive material. CSP uses Potter Section House as its headquarters, and it is open to the public as a state office. The historic site and adjacent associated interpretive area are managed together as a day-use area for park visitors.

**Size/Boundary:** Boundaries are typically proposed as part of the NRHP nomination; however, only a general description is provided in the 1985 Potter Section House nomination form. The Project's National Historic Preservation Act Section 106 process has not proposed boundaries

for the historic site. A boundary was estimated based on the nomination's narrative description, which identifies an acreage of less than 1 acre, and describes the house and outbuildings located between the highway ROW and the shoreline. Appendix A, page 4 shows a 0.25-acre area encompassing the physical buildings. This site is also considered part of CSP, but the park site polygon (Appendix A, page 5) differs in size and shape from the historic site polygon. See Section 3.2.2.2 for the description of the CSP facility, which encompasses the historic buildings but also includes an interpretive area, parking, and latrines.

## **2.4 Indian Valley Trail (Iditarod National Historic Trail)**

**Location and Map Reference:** The historical trail ran from approximately the current Seward Highway MP 103, up Indian Creek to Indian Pass, then down Ship Creek to the lowlands near Knik Arm; see Appendix A Mapbook, page 19. The State of Alaska holds a Revised Statute (RS) 2477 public access easement for the trail (RS Trail 111), and maps the easement as beginning between Boretide and Old Johns Roads at the Seward Highway. CSP manages a portion of the trail for recreational hiking, with a trailhead located approximately 1 mile north of the Seward Highway at the terminus of Boretide Road, and the upper end located at Indian Creek Pass. The portion of the trail managed for recreation is well outside the Project's direct footprint and the APE.

**Section 4(f) Property Type:** The Indian Valley Trail is a historic property (SEW-00143) that was determined eligible for listing in the NRHP under Criterion A for its association with the Iditarod Trail. This determination from 1999 was reaffirmed in 2005. The trail was established by at least 1907, reportedly as a safer or easier winter passage through the Chugach Mountains from Turnagain Arm to Knik Arm (compared to the Crow Pass Trail). The Iditarod Trail continued to the Iditarod Mining District and Nome, and provided winter access for mail, mining, and other purposes. HDR cultural resource specialists did not find physical remnants of the route connecting to the Seward Highway alignment during field surveys for this Project (Hosken et al. 2024). However, a public access easement associated with the trail connects with the Seward Highway at Indian (approximately MP 103.1), which appears to correspond to Boretide Road.

Because the Indian Valley Trail has been determined NRHP eligible, it is protected under Section 4(f) as a historic site. However, no known trail remnant is within the APE. While a RS 2477 easement exists for the trail and connects the highway to the start of the recreational trail, no physical trail exists within the 1-mile area between the highway and trailhead. Therefore, the RS 2477 easement within the APE is not under consideration as a Section 4(f) resource for its connection to the Indian Valley recreational trail (beyond the APE).

**Size/Boundary:** Not applicable. As discussed above, the RS-2477 easement within the APE is not under consideration as a Section 4(f) resource.

## **2.5 Prehistoric Archaeological Site ANC-00054**

**Location and Map Reference:** The site location is not disclosed herein to protect a potentially sensitive archaeological site. The cultural reports, which are not publicly available, indicate location.

**Section 4(f) Property Type:** This archaeological site (ANC-00054) is a Section 4(f) historic site listed in the NRHP under Criterion D for its potential to yield information on the prehistory of Upper Cook Inlet. This multicomponent archaeological site is located on a rocky outcrop; lithic, organic, and other remains indicate different cultures used this site approximately 6,500 years ago, making ANC-00054 the oldest known site within the region. The site has produced core and blade material, chipped stone points, and other stone tool artifacts, according to the cultural reports.

**Size/Boundary:** The cultural reports do not delineate site boundaries, but the site is thought to encompass a fraction of 1 acre.

## **2.6 Prehistoric Archaeological Site ANC-00078**

**Location and Map Reference:** The site location is not disclosed herein to protect a potentially sensitive archaeological site. The cultural reports, which are not publicly available, indicate location.

**Section 4(f) Property Type:** The site (ANC-00078) is a Section 4(f) historic site that is listed in the NRHP under Criterion D for its potential to yield information about the prehistory of Turnagain Arm. The site is known to contain buried prehistoric remains of human activity. While other prehistoric archaeological sites occur within the Southcentral Alaska region, this site is among the oldest archaeological sites known within the region.

**Size/Boundary:** The cultural reports do not delineate site boundaries, but the site is thought to encompass a fraction of 1 acre.

## **2.7 Turnagain Arm District, Alaska Railroad**

**Location and Map Reference:** Within the Project area, the Turnagain Arm District of the Alaska Railroad runs from Seward Highway MPs 98.5 to 118 (the entire length of the Project corridor). It is commonly identified with Alaska Railroad MPs 83 to 103; see Appendix A, pages 1 through 25.

**Section 4(f) Property Type:** The Alaska Railroad (ANC-04057/SEW-01613) is a Section 4(f) historic site and historic district. The AHRS numbers refer to the Alaska Railroad segment that runs from Portage to Potter, which is known as the Turnagain District of the Alaska Railroad. The cultural reports indicate that the Turnagain Arm District of the Railroad (36.6 miles) was determined eligible for NRHP listing under Criterion A for its demonstrable association with Transportation, Economic Development, and Settlement. Features include the Alaska Railroad mainline track and roadbed as well as occasional sidings and associated signals, signs, communications equipment, and maintenance areas. Activities are principally railroad passenger, freight, and maintenance operations. From a passenger point of view, the route is scenically attractive, with a curvilinear route hugging the shoreline of Turnagain Arm at the base of tall mountains, principally on the historical alignment.

**Size/Boundary:** The cultural reports do not delineate property boundaries, so an exact acreage is not known. The Turnagain Arm District of the Alaska Railroad is a railroad track 36.6 miles long. The ARRC ROW is typically 200 feet wide but is wider in some locations. The Alaska

Railroad mainline runs from Seward in the south to Fairbanks in the north, approximately 470 miles. The Project area encompasses approximately 4 percent of the overall route.

## **2.8 Indian Valley Mine**

**Location and Map Reference:** Indian Valley Mine is located at Seward Highway MP 104; see Appendix A, pages 17 and 18.

**Section 4(f) Property Type:** The mine site (SEW-00412) is a Section 4(f) historic site; it is a mine site with associated buildings listed in the NRHP under Criterion A for association with mining activities along Turnagain Arm after the Alaska Gold Rush era. The cultural reports indicate that a log cabin, a log assay office, a gully to bring water to the site, and a re-opened mine shaft are the contributing resources, and other site features are non-contributing. The property is privately owned, and the owners operate it as a roadside attraction that is open to the public.

**Size/Boundary:** The cultural reports do not describe a specific land area for the historic site. The size of the municipal private parcel that contains the mine and is operated as a tourist attraction is 4.1 acres.

## **2.9 Diamond Jim's Sign**

**Location and Map Reference:** The Diamond Jim's Sign is located near Seward Highway MP 103; see Appendix A, page 19.

**Section 4(f) Property Type:** The sign (SEW-01379) is a Section 4(f) historic site consisting of a neon sign for a former commercial establishment. The sign has been determined eligible for NRHP listing under Criterion A for its association with the development of Trade, Commerce, and Tourism along the Seward Highway, and is associated with the 1964 Good Friday Earthquake and subsequent recovery. It is readily visible to motorists on the highway but does not appear to be managed as an attraction.

**Size/Boundary:** The cultural reports do not describe a land area associated with the Diamond Jim's Sign but state that only the sign itself is NRHP eligible. The sign itself occurs within the Seward Highway ROW.

## **2.10 Garage, Storage Shed, and Residence**

**Location and Map Reference:** This property is located at 29025 Seward Highway, at approximately Seward Highway MP 102.9 in the community of Indian. See Appendix A, page 19.

**Section 4(f) Property Type:** The property (SEW-01567) is a Section 4(f) historic site. Its garage and residence structures date from 1965 and 1968, and are associated with the 1964 Good Friday Earthquake and subsequent recovery. DOT&PF recommended these structures as NRHP eligible under a former project. The site's eligibility is noted as pending by the Alaska Office of History and Archaeology AHRS database.

**Size/Boundary:** The cultural reports do not indicate a land area associated with the site but recommend that a polygon be established to incorporate the three structures. For the purposes of Section 4(f) evaluation associated with this Project, the boundary is assumed to be the entirety of the residential property as well as additional frontage that encompasses the encroachment of the garage structure into the DOT&PF ROW, encompassing approximately 2.1 acres.

## 3 Use of Section 4(f) Properties

### 3.1 Anchorage Coastal Wildlife Refuge

#### 3.1.1 Type of Use

The expanded ROW of the Proposed Action would have a direct use of approximately 18 acres of the ACWR. This includes approximately 17 acres of ACWR lands being acquired for transportation ROW, as well as impacts on state lands of the ACWR as described in Section 2.1 and the land parcels associated with the Ggeh Betnu Trail. This acreage is a fraction of 1 percent of ACWR's total acreage (32,476 acres) as reported in the ACWR management plan (ADF&G 1991).

Appendix A, pages 1 through 5 illustrate the overall area of use by the Proposed Action. In general, to separate the travel lanes, the ROW would be reconfigured to accommodate the highway and realign the railroad seaward. Most use is a long sliver of ACWR mudflat tidelands west of the current ARRC track alignment. This use would accommodate the physical expansion of the highway and railroad footprint. Secondly, the Proposed Action would alter multiple refuge features along the western edge of Potter Marsh. Appendix A, pages 1 through 5 illustrate the locations where existing ACWR facilities would be affected.

#### 3.1.2 Affected Activities, Features, and Attributes

**Tideland Habitat.** South of the rifle range (west of the Alaska Railroad tracks and north of Rabbit Creek) is a treed area that contains an archery range. Adjacent vegetated flats are a popular duck hunting location. The Proposed Action would widen the highway linearly across a 0.5-acre portion of the treed and vegetated area, impacting a portion of these recreational lands and wildlife habitat (Appendix A Mapbook, pages 1 and 2).

South of Rabbit Creek, the more barren mudflats are rarely used by hunters or other recreationalists. The majority of land is unvegetated mudflats, which are inundated twice daily by tides and are habitat for shorebirds (HDR 2024). Small snails live in the mudflats and serve as food for shorebirds nesting nearby or passing through during spring and fall migrations; this appears to be the primary value of these lands. They are also part of an expansive view from other parts of the ACWR, from public and private properties adjacent to the ACWR, and from Alaska Railroad passenger trains. These tidal mudflats comprise the greatest acreage of ACWR use, and the Proposed Action would eliminate approximately 16.5 acres of this type of bird habitat in the ACWR.

**Ggeh Betnu Trail.** The ADF&G OWJ reported the existing trail is valued by the Rabbit Creek Community Council and ACWR managers for refuge access. Of the approximately 600 linear feet of existing narrow, separated footpath that parallels the Seward Highway along the eastern side, the Proposed Action would replace the 300 feet that occurs within the DOT&PF ROW with a separated, paved, multi-use pathway in the same location (refer to Appendix A, page 1). The Proposed Action would connect the east-west leg of the Ggeh Betnu Trail to this new multi-use pathway. The new configuration would retain the function and connectivity of the existing Ggeh Betnu Trail and expand its connectivity by extending the multi-use trail to Girdwood. However,

considering the effect within the short, existing segment, the Proposed Action would alter the experience for trail users from an intimate forest trail to a broader, more open trail, probably with greater trail traffic. The existing piece of trail across Lot 205 would remain available for use during and after the Proposed Action is constructed.

Where the Ggeh Betnu Trail enters the DOT&PF ROW, it is excepted from the requirement for Section 4(f) approval under Section 4(f) regulations (23 CFR 774.13(f)(3)). This is because of the terms of the agreement and temporary construction permit discussed in Appendix B, Section 2.1. DOT&PF would maintain the continuity of the trail, per the conditions of paragraph (f)(3) of the regulation. While altering the portion of the trail within the DOT&PF ROW would not require Section 4(f) approval, the Proposed Action would also use other portions of the existing trail that occur outside the current DOT&PF ROW, and this would contribute to the Section 4(f) use of the ACWR as a whole.

**Lots 178 and 205.** These state-owned parcels are forested green space and serve as buffer of protected land between the Seward Highway and a few homes to the east (refer to Appendix A, page 1). They serve as wildlife habitat but are not actively managed as such. They are remnants of the original lands granted for the Rabbit Creek Shooting Park that had protective deed restrictions, and were available for routing the Ggeh Betnu Trail. Lot 205, through which the Ggeh Betnu Trail passes, appears to be unused for purposes other than the trail. The Proposed Action would use a wedge-shaped portion (70 feet wide on the northern edge tapering to 0 foot wide at its southern tip) of Lot 205 to expand the DOT&PF ROW eastward; this expansion would make space for a new, paved, multi-use pathway. The trail where it exists on Lot 205 would be unaffected by the Proposed Action.

As the Ggeh Betnu trail traverses along the shared boundary with Lot 178, the physical trail is within Lot 205 and is unaffected by the Proposed Action. Lot 178 is impacted by the construction of the multi-use pathway up to Rabbit Creek Road. The Proposed Action would use a wedge-shaped portion, ranging from 0 feet to 55 ft wide to expand the embankment eastward.

**Refuge Access Points.** From north to south, the Proposed Action's effects on access points are as follows:

- **Rabbit Creek Shooting Park.** The driveway and access into the Rabbit Creek Shooting Park, across from 154th Avenue, would not be affected.
- **North Potter Marsh Visitor Facility/Boardwalk.** The North Potter Marsh facility, including the portions of its driveway and boardwalk that occur within DOT&PF ROW and those portions within ACWR land, would not be affected except the Seward Highway and 154th Avenue intersection would be rebuilt (refer to Appendix A, pages 1 and 2). The Proposed Action's new multi-use pathway also would cross the intersection. The construction process would temporarily restrict access to the boardwalk parking area, but construction would be scheduled to eliminate such access only when the parking area was closed.
- **ACWR Wildlife Viewing Pullouts.** The Proposed Action would alter the existing entrances to the three pullouts along the eastern side of the Seward Highway so they could not be used by vehicles, providing increased safety on the highway (refer to Appendix A, pages 3 and 4). The Proposed Action's multi-use pathway would occur

within the existing shoulder. Following elimination of vehicle use of the pullouts, they would continue to serve as wildlife viewing areas accessible to pathway users.

Impacts would be both adverse and beneficial. Motorists would no longer be able to pull off and watch or photograph birds or other wildlife/views from or within the vicinity of their vehicles. However, without vehicles, the three wildlife viewing areas would provide a better experience for pedestrians, and the elimination of vehicle turning movements into and out of these pullouts would improve highway and pedestrian safety.

The larger parking areas at the northern and southern ends of Potter Marsh would provide access for motorists, who could then walk or bike to the viewing areas: 1.2 miles from the northern parking lot to the northern viewing area (MP 116.8; including backtracking on the driveway to 154th Avenue); 0.4 mile from the southern end (Rabbit Creek Road) to the MP 115.8 viewing areas; and 0.6 mile to the MP 116 viewing area. The pathway would provide continuous opportunity to view the marsh along its western edge instead of restricting birdwatching primarily to the three designated viewpoints.

Direct viewpoint access for individuals with limited mobility would be eliminated; Americans with Disabilities Act (ADA)-accessible parking would be provided at the northern and southern parking areas. The multi-use trail would be ADA accessible, and the wildlife viewing areas would be accessible via the multi-use trail. However, while the paved trail would meet ADA access guidelines, the distances to reach the viewing locations would likely present difficulty for individuals with mobility challenges.

The public uses the MP 116 pullout during winter for ice skating access. The walking distance from the northern or southern parking lots could mean that few skaters would access the ice from there; pathways on the ice may be better developed between vegetation patches to access the ponds near MP 116, and some people would likely park on the shoulder to gain access at MP 116. Without designated pullouts along this stretch, it is likely there would be more use of the shoulder to stop and observe wildlife or access ice skating ponds.

- **South Potter Marsh Visitor Facility/Boardwalk.** No permanent Section 4(f) use of the parking and access area at the southern end of Potter Marsh would occur (refer to Appendix A, page 4). Use patterns at this parking area likely would change because the pullouts along Potter Marsh would be closed to motorists as described above. More vehicles would likely park at the southern parking lot to access Potter Marsh and the new multi-use pathway headed southeastward along Turnagain Arm.

## **3.2 Chugach State Park**

### **3.2.1 Type of Use**

The expanded Proposed Action ROW would have a direct use of approximately 222 acres of CSP. This total encompasses the 200 acres of park lands to be acquired for transportation ROW (see EA Section 3.3.3) as well as impacts on park features on state land of the DOT&PF or ARRC ROW, and MOA lands managed as part of CSP (see Section 2.2). This 222-acre area

is a fraction of 1 percent of the park's total approximately 495,000 acres, as reported in the park's management plan (ADNR-DPOR 2016).

Appendix A, pages 4 through 25 illustrate the overall area of use by the Proposed Action. In general, to separate the travel lanes and flatten substandard curves for the Proposed Action, the DOT&PF and ARRC ROWs would be reconfigured and expand outside the existing ROWs. The use would be a long sliver of park land on the mountain or water side of the highway, or both. These slivers and the physical highway expansion would convert park land to transportation ROW and alter or remove multiple park features as well as the current activity pattern.

The sites addressed are as follows:

- Potter Section House, and Potter Locomotive and Interpretive Area (MP 115.2)
- Potter Creek Trailhead (MP 115.1)
- McHugh Creek Day Use Area (MP 111.8)
- Beluga Point Viewpoint (MP 110.3)
- Sunshine Ridge Parking (MP 110)
- Rainbow Trailhead (MP 108.4)
- Windy Corner Trailhead (MP 106.6)
- Falls Creek Trailhead (MP 105.6)
- Indianhouse Mountain Trailhead (MP 104.4)
- Indian Creek Trailhead (MP 102.9)
- Bird Ridge Trailhead (MP 102.1)
- Bird Creek Access Parking (MP 101.6)
- Bird Creek Observation Platforms and Trail Connections (MP 101.4)
- Bird Creek Overflow Parking and Bird Creek Overflow Campground (MP 101.3)
- Bird Creek Campground (MP 100.7)
- Bird Creek Trailhead (MP 100.7)
- Rock Climbing Areas (multiple sites)
- Turnagain Arm Trail (various; MPs 106.6 to 115)
- Indian to Girdwood Bike Path, including Existing Spur Trails (MP 90-104)

Appendix A, pages 5 through 25 illustrate the locations where these existing features and activities would be affected. The following section addresses impacts associated with the Proposed Action's use of CSP. In many cases, measures are included to reduce the impacts discussed herein; see Section 5, Measures to Minimize Harm.

### **3.2.2 Affected Activities, Features, and Attributes**

#### **3.2.2.1 CHUGACH STATE PARK – GENERAL**

**Visual Attributes.** The Proposed Action would entail extensive blasting of the bedrock adjacent to the existing Seward Highway. This is expected to have a distinct, noticeable visual effect as steep forested slopes are removed and replaced with bare rock, and as existing rock cuts and cliffs are pushed back and made substantially higher.

**Safer Seward Highway Project | Seward Highway MP 98.5 to 118,  
Bird Flats to Rabbit Creek**

*DRAFT Individual Section 4(f) Evaluation*

Seward Highway travelers are familiar with the large rock cut immediately west of Bird Creek, which is the backdrop for the park's Bird Creek Access parking lot located in that former quarry. The cut is approximately 190 feet high, and the entire quarry is approximately 800 feet wide. Similar rock cuts would be created through much of the Project corridor, especially the 11-mile portion from Indian (MP 104) to the DOT&PF Weigh Station (MP 115). However, unlike the Bird Creek Access parking rock cut, these rock cuts would be benched where possible, allowing for vegetation to grow on the benches. Cuts would be between 300 and 400 feet high in several locations. The Proposed Action would change the visual environment of CSP, as seen from within the approximately 20-mile Project corridor as well as the opposite side of Turnagain Arm. These cuts would initially be less natural-looking than the surrounding hillsides, and would take time to naturally weather and begin to take on a more natural-looking appearance, just as current rock cuts have in the corridor.

ARRC's installation of corridor-long fencing between the highway and railroad tracks would partially obstruct the view of Turnagain Arm for non-motorized pathway users and vehicle occupants. The fence is assumed to be similar to existing fence segments, which are typically chain link and range from 4 to 10 feet high, depending upon the horizontal and vertical grade separation.

**Coastal/Tideland Habitat.** The Proposed Action would shift approximately 7 miles of ARRC alignment toward and into the coastal tidelands of Turnagain Arm; these shifts can be seen on Appendix A, pages 8 through 12 and 14 through 19. These areas experience little human use, apart from providing access to recreational kite and bore-tide surfing, but these principally unvegetated rocky outcroppings and mudflats are habitat for shorebirds (HDR 2024). They are also part of an expansive view from other parts of CSP, private properties within local communities, and from Alaska Railroad passenger trains. The Proposed Action would fill portions of submerged lands, as well as convert these areas of the park to transportation ROWs.

**Park Access.** The existing Seward Highway provides access to CSP through formal trailheads as well as informal pullouts and overlooks. Nearly all pullouts serve dual purposes: (1) highway rest stops or slow-traffic turnouts, and (2) park access points. Some of these pullouts are formal CSP facilities and managed by the park even if some are located within the DOT&PF ROW. Others were created for highway or transportation purposes but are also used for parking and access to the park. DOT&PF has determined that most of the pullouts located within the ROW are not themselves subject to Section 4(f), primarily because of their location within the transportation ROW and their multi-use function. Nonetheless, the Proposed Action would change the distribution of pullouts and, therefore, change how the public can access the park. Section 3.2.1 lists 13 pullouts and trailheads protected under Section 4(f), and all of these would be retained as-is or rebuilt with the same or expanded capacity. Another approximately 31 pullouts and overlooks occur that are not protected under Section 4(f). Most of these pullouts would be eliminated in an effort to reduce the number of intersections because that is where crashes are more likely to occur and where traffic flows tend to break down in response to slowing and turning vehicles. The elimination of these pullouts would be offset by the provision of a continuous, multi-use pathway and expanded parking areas throughout the Project area.

Associated impacts are likely to include some vehicles parking along the shoulder or within the obstacle-free area adjacent to the paved shoulder, where motorists desire access to park features, but no parking would be provided, similar to what occurs today. This kind of informal parking could lead to risks of car crashes as vehicles exit and enter the highway, and could endanger people located next to the highway. However, this kind of activity currently occurs, and may be improved by the Proposed Action building a continuous, multi-use pathway and expanded parking areas throughout the Project area.

**Access During Construction.** Construction of the highway as well as reconstruction of trailheads and access points that would be retained would likely require temporary closures of those access points, even the most popular access points such as McHugh Creek Day Use Area and Beluga Point. This would affect the public trying to use the park. Similarly, clearing trees and blasting on the slopes would encroach, in some instances, on informal trails and scenic overlooks accessible from above (directly from trailheads and the Turnagain Arm Trail) and could endanger the public if these areas are not closed during active construction. These areas would be closed during construction to protect public safety. Temporary closures would be a loss of access for park users to some park features, or would require a long detour via a trail to access the same features. It is anticipated that individual impacts would be temporary, usually less than 1 month and often just for 1, or a portion of 1, day; however, the overall Project construction is anticipated to occur over 15 to 20 years. DOT&PF would minimize disruption of park activities as practicable while maintaining public safety during construction.

### **3.2.2.2 POTTER SECTION HOUSE, AND POTTER LOCOMOTIVE AND INTERPRETIVE AREA**

**Background.** Potter Section House is a historic railroad building that serves as CSP headquarters and a public park facility. This description focuses on the site as a part of CSP; Section 3.3 and Appendix B provide further discussion pertaining to the historic site.

Potter Section House sits on a long, thin parcel that is part of the eastern edge of the ARRC ROW that is identified as the Potter Locomotive and Interpretive Area and is leased to CSP. Refer to Appendix A, pages 4 and 5, for location of the Potter Section House, and Potter Locomotive and Interpretive Area. A vault toilet for public use is a permitted use of the existing DOT&PF ROW. The Potter Locomotive and Interpretive Area includes historic outbuildings, interpretive panels and landscaping, an old rotary snowplow locomotive (not a formal historic site), administrative parking north of the Section House, and public parking (approximately 30 spaces) south of the Potter Section House. Administrative use of the site includes vehicle access at an angle across the Seward Highway to a CSP maintenance facility; staff can drive or walk across the highway. The public uses the Section House parking lot when the Potter Trailhead parking spaces are full; they then cross two lanes of traffic on foot and walk the shoulder for approximately 300 feet to reach the trailhead.

**Use and Impact.** The footprint of the new highway would avoid the Potter Section House; historic outbuildings; modern vault toilet; and interpretive displays, including the rotary snowplow. This avoidance required introducing a slight reverse curve in the highway, which is considered less than optimal for highway drivers but is within design standards and allows avoidance of the bulk of the park property. However, the southern end of the parking lot would

be altered, removing parking spaces along the eastern side of the lot and reducing overall parking capacity by almost half (approximately 12 fewer spaces).

Additionally, the traffic pattern would be altered, with access from the southbound lanes only instead of from both directions. Northbound traffic would need to turn onto Potter Valley Road, turn around (likely at the South Potter Marsh facility), and then turn southward onto Seward Highway for approximately 0.2 mile to access the park headquarters or interpretive displays. Traffic leaving the facility and desiring to head northward would first travel southward to the Potter Weigh Station, approximately 0.33 mile, to make a U-turn to travel northward.

Administrative CSP traffic would no longer be able to drive from their headquarters across the highway to the maintenance facility. Staff would need to either travel southward to the Potter Weigh Station, then northward approximately 0.5 mile to Potter Valley Road, then to the frontage road and southward on the frontage road (0.25 mile), or they could walk using a proposed non-motorized trail connection and pathway tunnel under the highway, a distance of approximately 1,900 feet compared to a current distance of approximately 650 feet directly across the highway.

Overflow parking at the Potter Section House for the Potter Creek Trailhead would be less practical, given the reduction in parking spaces at the Section House and the access changes to both locations; however, it would remain possible with access via the proposed pathway tunnel and trail spur connecting the Potter Section House and the Potter Creek Trailhead. See Section 3.2.2.3 for further detail.

### **3.2.2.3 POTTER CREEK TRAILHEAD**

**Background.** The Potter Creek Trailhead is the northern end of the Turnagain Arm Trail, at Seward Highway MP 115 (refer to Appendix A, page 5). It is a developed fee area for the park, with 6 parking spaces in a paved lower lot and 26 in a paved upper lot (including 9 parallel parking spaces along the upper driveway). A gate separates the lower and upper lots, and can be closed during winter. A public vault toilet is located near the upper lot, and fenced visitor overlooks occur at both lots. The trail starts as a paved path with ADA grades, and quickly becomes a dirt path after leaving the trailhead and toilet area. Two different routes are possible from the trailhead; both merge to one route after a short distance.

The lower lot, driveway and parallel parking area, upper visitor overlook, and paved path occur within the existing DOT&PF ROW. Most of the upper lot and vault toilet occurs outside the existing DOT&PF ROW.

**Use and Impact.** The highway expansion would cut into the bluff on which the upper parking lot and paved trail sit. The trailhead facilities would be completely rebuilt as part of the Proposed Action. During construction, the site would be closed intermittently. Alternate access would be provided, and every effort would be made to keep the site open whenever possible.

The expanded highway plus a new frontage road at this location would avoid the Potter Section House and expand outside the existing Seward Highway ROW on the uphill side; refer to EA Appendix F Proposed Action Mapbook, pages 4 and 5, for conceptual design. The frontage road would provide access to the CSP maintenance yard and trailhead, and would terminate at the

trailhead. DOT&PF has committed to fully replacing the function, parking capacity, and visitor facilities of this trailhead.

The Proposed Action's paved, multi-use pathway would pass under the Seward Highway in the Potter Creek vicinity and connect with the trailhead, providing new recreation opportunities. However, the space needed to bring the trail back up to the grade of the parking frontage road would result in reconfiguration of the lower parking and viewing area.

The trailhead driveway would be realigned and likely would be steeper than it is today (the gate to the upper lot is typically closed during winter). The upper parking lot and parallel-parking area would be approximately replicated and likely require shifting the alignment of the creek that flows on the mountain side of the parking area. The rock cut for the highway could eliminate the vault toilet; a new vault toilet would be located nearby. The paved path and visitor overlook would be shifted inland and reconfigured. DOT&PF would re-create an accessible pathway to connect the parking lot with the toilet; because of the site's topography, creating accessible grades could involve greater impact on the area.

With seeding and landscaping, the visual impact on the site would be minimal after construction was completed, and all functions of the site would be replaced or enhanced. DOT&PF would design the site in consultation with CSP or would build a design provided by ADNR-DPOR, based on discussion with CSP. Long-term impacts would be changes to the access pattern—via Potter Valley Road and the frontage road rather than directly from the Seward Highway. A beneficial impact would be the Proposed Action's new separated, multi-use, paved pathway, which would provide bike access to the trailhead and allow park users to access the trail from this trailhead. The trailhead is currently used beyond its capacity on popular summer days. Overflow parking is likely to occur on the frontage road. Some increased parking may occur at the Potter Marsh southern trailhead, but its distance from the trailhead (0.33 mile) is more likely to result in parking along the frontage road.

Currently, overflow parking is available at Potter Section House. To avoid the need for people to cross five highway and two frontage road lanes, a paved pathway spur would be built to connect the Potter Section House parking lot to the main multi-use pathway near Potter Creek, where the main pathway would pass under the highway and connect with the Potter Creek trailhead. The pathway spur would need space for a safe intersection, and the main pathway would need space for a curve with a safe radius for entering an underpass, which would entail somewhat more impact than shown in the Potter Creek vicinity.

#### **3.2.2.4 MCHUGH CREEK DAY USE AREA**

**Background.** McHugh Creek Day Use Area is accessible on the northern (mountain) side of the Seward Highway at approximately MP 112 (refer to Appendix A, page 8). Within the DOT&PF ROW is a paved area that provides parking year-round and at all hours, an information kiosk, and an outhouse. There is a gated access road that leads from this parking area uphill toward CSP land that is locked between 10:00 p.m. and 6:00 a.m. during summer and closed during winter. The access road climbs to another parking area that has an ADA-accessible pathway to picnic benches and a covered pavilion, and connector trails to the Turnagain Arm Trail. A paved pathway providing safe access and viewing of the McHugh Creek falls between the lower and upper parking areas. The access road and separated path continue upward, passing a paved

pullout that provides for a RV to lodge a summer trailhead host, two latrines, more parking, and then onto the final parking area and vehicle turnaround area. Two covered pavilions and a spur trail connect the Turnagain Arm Trail, McHugh Lakes Trail, and smaller trails winding around the day-use area that head up the mountainside. The small trails lead visitors to popular rock-climbing areas and scenic viewpoints with benches. The entire facility spans approximately 5 acres and has parking for approximately 90 vehicles. This site is heavily used and requires a State Parks Pass or day-use parking fee.

Within this area, the existing highway is within the ARRC ROW, with permits from ARRC that allow for DOT&PF highway management and operations. The DOT&PF ROW extends from the highway's northbound-lane drainage ditch to approximately 200 feet up the mountainside.

**Use and Impact.** The paved and developed day-use area would be unaffected by the footprint of the Proposed Action improvements. Access to and from the day-use area may take longer during construction when lane and road closures, with flaggers and pilot cars, are in effect. The loss of shoulder parking and pullouts for nearby rock climbing would likely result in those users seeking parking at the McHugh Creek Day Use Area.

The Proposed Action's multi-use pathway would be located on the water side at this location, and would be connected to the McHugh Creek Day Use Area via a pedestrian tunnel and spur trail. Park visitors would likely use the tunnel to gain access to the day-use area from the multi-use pathway, or use McHugh Creek parking as an access point for the multi-use pathway.

Excavation activities would cut into the mountainside on either side of the McHugh Creek Day Use Area to widen the highway and create sufficient rock catchment area. These cuts, reaching up to 125 feet high, would initially be less natural-looking than the surrounding hillsides, and would take time to naturally weather and revegetate. The cliff top would be shifted back (horizontally) up to 60 feet, and the new cut would eliminate small social trails that wind through the front side cliffs. The construction area would approach scenic viewing areas. DOT&PF would work with CSP to assess the need to relocate any social trails or scenic viewing areas to a safe distance from the new bluff edges.

Under the Proposed Action, no new DOT&PF ROW would be needed within the McHugh Creek Day Use Area. The railroad tracks would be realigned into the submerged lands of CSP, and the highway lanes would be expanded toward the water.

### **3.2.2.5 BELUGA POINT VIEWPOINT**

**Background.** The Beluga Point Viewpoint is a popular existing pullout on the water side of the Seward Highway at approximately MP 110.3, with parking for approximately 45 vehicles (refer to Appendix A, page 10). It is located on an outside bend in the highway, which affords sweeping views up and down Turnagain Arm, including potential views of beluga whales, bald eagles, and other wildlife as well as the Turnagain Arm bore tide. This overlook has spotting scopes and interpretive panels; it is one of the closest water-side pullouts to Anchorage, suitable for a relatively short scenic drive. CSP manages the site and includes it in its management plan (ADNR-DPOR 2016); ADF&G lists Beluga Point on its website as a whale-watching lookout. It is also popular because it has physical points of land (rock outcrops) overlooking the water. People cross the railroad tracks to access these CSP lands beyond the

ARRC ROW, despite warnings against crossing the track and a previous death on the tracks within this area. Multiple trails worn on the land access the park at the rock outcrops. The site also serves as a slow-vehicle turnout and attractive rest stop for highway travelers.

**Use and Impact.** The Proposed Action would reconstruct the scenic overlook. It would have one point of entry and exit, compared to two today. The entire parking area would be approximately four times larger than the existing area, with room for turnaround and a capacity of approximately 150 vehicles. The site would include a pedestrian bridge crossing over the railroad tracks, with ADA-accessible ramps/trails up and down for access to CSP lands beyond the ARRC ROW. The overpass would provide safe access to where people obviously desire to go. To allow double-stack train cars to pass, the bridge would need to be high. The bridge, fencing, and ramps would obstruct some views from the pullout to the mountains and shoreline southeast along the northern side of Turnagain Arm, but it would provide spectacular views in all directions from the height of the bridge. The paved, multi-use pathway would be integrated into the site, so the site could become a popular point for accessing the pathway, adding to parking demand at this location. DOT&PF would design the site to work as well as possible for all users. The Beluga Point Viewpoint would be closed during the reconstruction of the parking area and amenities.

### **3.2.2.6 SUNSHINE RIDGE PARKING**

**Background.** Sunshine Ridge is a physical feature and climbing route, with a small parking lot near its base, at approximately Seward Highway MP 110. This description focuses on parking, which is within the DOT&PF ROW. The parking area is approximately 130 by 30 feet and has a gravel surface bounded by boulders. It is set back approximately 60 feet from the highway, with a single driveway connection. Unadvertised but well-used social trails lead from the ROW to the climbing route and steeply uphill parallel to the climbing route to the Turnagain Arm Trail. Refer to Appendix A, page 10, to view Sunshine Ridge Parking and Sunshine Ridge (climbing) features.

**Use and Impact.** The Proposed Action would remove access to the existing Sunshine Ridge Parking area to eliminate a potential conflict point as traffic enters and exits the highway. The closest available parking would be at the expanded Beluga Point Viewpoint, approximately 950 feet north on Seward Highway and the water side, across the highway. The Proposed Action's multi-use pathway would be located on the water side of the highway in this location and would pass through the Beluga Point Viewpoint site. Parking for people wishing to access CSP on the mountain side of the highway for rock climbing, photography, or other purposes would be provided at Beluga Point. These park users would walk 0.2 to 0.3 mile southward on the multi-use pathway and use a spur trail tunnel that would cross under the Seward Highway to access the foot trails and climbing routes associated with Sunshine Ridge. This would increase the walking distance to the base of rock climbs. People could also access the Sunshine Ridge area by bike from communities along the multi-use pathway.

### **3.2.2.7 RAINBOW TRAILHEAD**

**Background.** The Rainbow Trailhead (Seward Highway MP 108.4) includes a parking area with driveway access from the highway (refer to Appendix A, page 12). The Turnagain Arm Trail is accessible both north- and southbound from the parking area. The northern route also provides

access to the Rainbow Peak Trail. The site is approximately 0.33 acre and has capacity for 30 vehicles. Rainbow Trailhead parking often overflows onto the highway shoulders during sunny weekends during spring because the Turnagain Arm Trail is one of the first local hiking trails to be snow-free.

The entire trailhead parking area and approximately 700 feet of the Turnagain Arm Trail are within the DOT&PF ROW. It is an enlarged area of ROW, where DOT&PF previously straightened the road and the legal ROW follows the older road alignment. The site does not require a State Parks Pass or day-use parking fees.

**Use and Impact.** The Proposed Action would reconstruct the trailhead and parking in a different configuration. The design consolidates the Rainbow Valley (community) road and Rainbow Trailhead driveway to minimize the number of driveways connected directly to the highway. The Rainbow Trailhead would be expanded to accommodate an approximate capacity of 45 vehicles; although, exact capacity is undetermined. During highway construction in this segment, and while the new parking area facility is being constructed, it is anticipated that the trailhead would be closed to park visitors. Access to the Turnagain Arm Trail would likely be through the trailheads at McHugh Creek or Windy Corner.

The multi-use pathway would be constructed on the water side of the highway within this area, and would not be connected to the Rainbow Trailhead or Rainbow community. People who wanted to access the multi-use pathway would be able to park at the Rainbow Point Scenic Overlook located on the water side of the highway (accessible from southbound lanes only).

### **3.2.2.8 WINDY CORNER TRAILHEAD**

**Background.** The Windy Corner Trailhead is a 30-foot-wide by 220-foot-long pullout at Seward Highway MP 106.6, at the southern end of the Turnagain Arm Trail. The pullout and approximately 350 feet of trail are within the DOT&PF ROW; refer to Appendix A page 14, to view the Windy Corner Trailhead. This area is known for Dall sheep viewing; a nearby mineral lick brings Dall sheep low on the cliffs and within good viewing range of the highway. The trailhead pullout provides off-shoulder parking or a turnaround location for travelers who spot Dall sheep on the mountainside and are unable to stop at the Windy Corner Scenic Overlook pullout on the water side at Seward Highway MP 106.7 (also on Appendix A, page 14). No State Parks Pass or day-use parking fee is required. The Windy Corner Trailhead (parking area and trail) is a CSP facility.

**Use and Impact.** Windy Corner is a location where the highway and railroad ROWs would be substantially realigned to reduce sharp curves. The Proposed Action would cut into the rock of Windy Corner and extend straight across tidal mudflats southeastward. This would leave a large inside bend more than 0.5 mile long at the base of the mountain slope as abandoned highway roadbed. The existing trailhead would be untouched by highway reconstruction; the new highway alignment would be located farther toward the water and away from the trailhead. However, the inside bend would be converted into a major highway pullout and parking area, and this would result in completely reconstructing the trailhead parking area.

The Proposed Action includes a large new parking area that would take up much of the area the existing highway occupies now, with ample space for parking and pedestrians. Preliminary

design includes a paved parking area and a gravel clearing for additional parking with an estimated total capacity of approximately 150 vehicles. The area is designed to be useful as a trailhead and scenic wayside. The new facility would be accessible for both north- and southbound motorists. The area on the mountain side of the highway would be managed as a CSP facility.

The multi-use pathway would be routed along the water side of the highway within this area, with a trail underpass of the highway connecting the Windy Corner Trailhead with the multi-use pathway and another large pullout on the water side of the highway and approximately 0.2 mile west (the Windy Corner Scenic Overlook). DOT&PF does not consider the existing Windy Corner Scenic Overlook pullout on the water side to be protected under Section 4(f) but would replace it with a similar-sized pullout that would be available to southbound traffic (right in, right out). The tunneled pathway connection between the two pullouts would allow people to access either side of the highway. An at-grade crossing of the railroad would be gated and designed as access to a boat launch ramp for emergency rescue operations in Turnagain Arm; no public access would be provided.

The construction process would result in a brief period when the existing Windy Corner Trailhead would be unavailable to the public. The Rainbow, McHugh Creek, and Potter Creek Trailheads would provide access to the Turnagain Arm Trail during construction. The resulting new trailhead complex would expand parking at this location and generally improve the available amenities.

### **3.2.2.9 FALLS CREEK TRAILHEAD AND FALLS CREEK TRAIL**

**Background.** The Falls Creek Trailhead is a small, paved pullout within the DOT&PF ROW at Seward Highway MP 105.6. Just over 0.1 acre in size, it offers parking for 4 to 12 passenger vehicles (lack of striping results in wide variation). It offers the only access to Falls Creek Trail, a steep trail up a narrow, wooded valley adjacent to Falls Creek that provides access to an alpine lake and South Yuyanq' Ch'ex Peak, which overlooks McHugh and Rabbit Lakes. The trail is popular with backcountry skiers during early spring, and the lower half is considered a good early season hike due to its southern exposure. The Falls Creek Trailhead and Falls Creek Trail features can be found on Appendix A, pages 15 and 16. No State Parks Pass or day-use parking fee is required. The CSP OWJ stated that the parking lot is undersized to meet existing use at peak times. If CSP moves forward with developing a trail segment between Windy Corner and Falls Creek as proposed in its trails plan, the size of the existing parking lot would be too small.

**Use and Impact.** The Proposed Action would widen the highway primarily toward the water at this location. On the mountain side, the Project would cut back vegetation and soils to provide a greater rock catchment area and drainage. The edge of the highway would move more than 40 feet toward the water, away from the existing trailhead, providing space that could be used for additional parking. The trailhead would be rebuilt with capacity for up to 40 vehicles. The trailhead would be closed to the public for short periods during construction.

The new parking area would be accessible only from the northbound lanes (right in, right out). Visitors from the north (Anchorage) would need to drive to the next median break at Indian (Boretide Road) that is approximately 2.6 miles away to turn around and head back. Visitors

seeking to travel southward would depart the Falls Creek Trailhead, and head northward to Windy Corner (0.8 mile) to turn southbound. This would result in multiple U-turn movements per day at the next-nearest median breaks.

The Proposed Action's multi-use pathway is proposed on the water side of the highway within this area. It would not be connected to the Falls Creek Trailhead.

### **3.2.2.10 INDIANHOUSE MOUNTAIN TRAILHEAD AND INDIANHOUSE MOUNTAIN TRAIL**

**Background.** The Indianhouse Mountain Trail is an informal path that enters the woods at the eastern end of a turnout at Seward Highway MP 104.4 and accesses a ridge of Indianhouse Mountain. The trail climbs gently, then quickly becomes steep with switchbacks and scrambling sections. CSP does not advertise or maintain the trail. It affords hikers spectacular views of Turnagain Arm. The Indianhouse Mountain Trailhead pullout is paved and has capacity for approximately 2 to 4 vehicles. Both the trail and trailhead features can be seen on Appendix A, page 17.

**Use and Impact.** The Proposed Action would eliminate and reconstruct the small, paved pullout at this location. It would be right in, right out access from the northbound lanes, a change from current design. To reverse direction of travel on the Seward Highway, drivers would need to go 1.3 miles southward to Indian or 2.0 miles northward to the Windy Corner Trailhead to make a U-turn or turn around in the respective parking lots. The vehicle parking capacity of the pullout would be greater than current conditions (anticipated to provide capacity for 8 to 12 vehicles). The trail would not be accessible from this location during its reconstruction or during the period when the highway immediately adjacent is under construction. These impacts would be temporary. The Proposed Action would expand the DOT&PF ROW and cut-fill area into the mountainside. Short trail segments near the trailhead and a short distance to the west would be impacted by the new highway cut and realigned as part of the Project. The north- and southbound lanes would be at different elevations within this area, and the multi-use pathway would be on the water side of the southbound lanes. The topography would make it unlikely that anybody would try to use this parking lot as an access point for the multi-use pathway.

### **3.2.2.11 INDIAN CREEK TRAILHEAD**

**Background.** The Indian Creek Trailhead parking lot at Seward Highway MP 102.9 serves both as a trailhead for the Indian to Girdwood Bike Path and parking for the adjacent Boulder Ballfield. The parking lot has a capacity of approximately 25 vehicles. The Indian Creek Trailhead is a CSP facility that is the northernmost trailhead access point for the existing Indian to Girdwood Bike Path. The Boulder Ballfield is a grassy area that serves as a central park for the Indian community. People sometimes use the field for softball/baseball, but it is reported to be mostly used as a community gathering area. The features can be viewed on Appendix A, page 19.

Much of the land associated with the ballfield and trailhead is part of a long, thin strip of CSP land that trends east-west, bounded on the mountain side by the DOT&PF ROW and on the water side by the ARRC ROW. Much of the parking lot and a portion of the ballfield lie within the DOT&PF ROW, and a corner of the field lies within the ARRC ROW. Just to the west, where the highway crosses Indian Creek, the existing pathway crosses under the Seward Highway.

**Use and Impact.** The highway footprint would be expanded within the existing ROW, and would encroach on the ballfield and trailhead parking lot. The multi-use pathway would be located adjacent to the southbound lanes and encroach farther into the ballfield and parking lot. The Proposed Action would make the parking area unusable, so no driveway is included in the design for continued access to the site. For practical purposes, the trailhead and ballfield would be eliminated, although much of the field would remain. The Proposed Action would replace the trailhead parking for approximately 25 vehicles within an existing wide area of the DOT&PF ROW 350 feet east of the Boretide Road intersection. This would be approximately 770 feet northwest of the existing trailhead and across the highway. The multi-use pathway would continue to be routed under the bridges at Indian Creek to the mountain side of the highway, so the new trailhead would be located on the multi-use pathway.

The ballfield would be reconstructed approximately 220 feet east of the existing ballfield, and the creek within the area would be rerouted to provide sufficient space. The proposed field would be similar in size to the existing field and be supported by a parking area that would have right-in, right-out vehicle access and parking for approximately 25 vehicles. The multi-use pathway would be rerouted to wrap around the ballfield on the water side before reconnecting with the current pathway alignment. CSP and the community can repurpose the remaining portion of the existing parking and ballfield area (e.g., as a playground).

### **3.2.2.12 BIRD RIDGE TRAILHEAD**

**Background.** The Bird Ridge Trailhead is located on CSP land on the mountain side of the highway, immediately adjacent to the highway ROW at MP 102.1; refer to Appendix A, page 20, to view the feature. It is the traditional access point to a popular, moderate-to-difficult, 2.5-mile (one-way) Bird Ridge Trail to Bird Point (elevation 3,505 feet) with wide views of Turnagain Arm and the Kenai Mountains. The trail is one of the first snow-free spring hikes available in the park due to southern exposure. The trail is also accessible from the Bird Creek Access parking area at Seward Highway MP 101.6 (see Section 3.2.2.13). The Bird Ridge Trail and Bird Creek Access parking area features can be viewed on Appendix A, page 21.

**Use and Impact.** The Bird Ridge Trailhead parking lot and the start of the trail would be physically unaffected by the widening of the highway. Although the highway would be expanded, the existing ROW line would not be changed within this area. Access to the trailhead would change; this parking area would become available only to northbound motorists (right in, right out). Southbound traffic would need to proceed another 0.5 mile to the Bird Creek Access parking lot to make a U-turn (or could access the trail from that location). Southbound traffic exiting the Bird Ridge Trailhead would need to drive 1 mile northward to Boretide Road to be able to reverse travel direction. The relative ease of parking at the Bird Creek Access parking lot may result in this lot becoming the preferred access point for Bird Ridge, with the traditional Bird Ridge Trailhead lot effectively becoming an overflow lot. DOT&PF will maintain public access to the trailhead as much as practicable during construction.

### **3.2.2.13 BIRD CREEK ACCESS PARKING**

**Background.** The Bird Creek Access parking lot is located at approximately Seward Highway MP 101.6 (refer to Appendix A, page 21). A previous DOT&PF highway project excavated large amounts of rock from park land for use in construction and made the quarry into a large parking

area with access to Bird Ridge Trail and Bird Creek for fishing and salmon viewing. The park facility includes approximately 80 parking spaces, vault toilets, and a few interpretive signs. It is a CSP fee area. Most of the lot is paved, but there is also a gravel parking area.

**Use and Impact.** The highway widening in the Proposed Action would avoid any physical encroachment on the parking lot. The entrance driveway would be relocated from the eastern end of the parking lot to the western end for better stopping and acceleration; the traffic circulation configuration within the parking lot would no longer be suitable and would be reconfigured. The number and type of parking spaces would be the equivalent to those that exist today. DOT&PF will maintain public access to the parking lot as much as practicable during construction.

### **3.2.2.14 BIRD CREEK OBSERVATION PLATFORMS AND TRAIL CONNECTIONS**

**Background.** The Bird Creek area (Seward Highway MP 101.4) contains a collection of CSP facilities that provide scenic views and access to Bird Creek for recreational opportunities, primarily fishing. The facilities include an ADA-accessible, paved path parallel to the highway that runs from the ADA-accessible Bird Creek Overflow parking lot (east of the creek), across the creek via a pedestrian bridge to the ADA-accessible Bird Creek Access parking lot (west). Also included are two observation and fishing platforms, two sets of access stairs to the creek, and interpretive signs. On the western side of the creek, an informal 0.25-mile trail leads upstream well above the creek elevation, accessing rock climbing areas before descending to the stream elevation. On the eastern side of the creek, an informal trail leads upstream 350 feet, descending to creek elevation. All these facilities connect with the Indian to Girdwood Bike Path via a spur trail that passes under the Bird Creek highway bridge. The facilities are referred to collectively as the Bird Creek Observation Platforms and Trail Connections, which can be viewed on Appendix A, page 21. ADA fishing access is available from the observation platforms at high tides. The facilities, except the upstream portions of the informal trails, fall within the DOT&PF ROW and partly within an area of overlapping railroad and highway ROW. By agreement between DOT&PF and CSP, CSP manages the facilities within the ROW.

**Use and Impact.** In the Proposed Action, the primary fishing platform, pedestrian bridge, and pathway parallel to the highway would be rebuilt in new locations to accommodate the widened highway. The rock cut west of the creek may make the existing trail connection from the pedestrian pathway to the trail along the western side of the creek inaccessible; however, the pathway connection would be rebuilt. The pathway spur beneath the bridge would be rebuilt and pass under both the north- and southbound lanes, an underpass of the Bird Creek bridges approximately 130 feet long. DOT&PF would work with CSP to develop the final design for this area to ensure the components would function as intended.

### **3.2.2.15 BIRD CREEK OVERFLOW PARKING AND BIRD CREEK OVERFLOW CAMPGROUND**

**Background.** At MP 101.2 on the mountain side of the Seward Highway, CSP provides parking, camping, and recreation access to Bird Creek, primarily for anglers. A lower parking lot with a capacity of approximately 20 vehicles is located within the DOT&PF ROW and is managed by CSP through a cooperative agreement with DOT&PF (Bird Creek Overflow Parking). Its western end is adjacent to the eastern end of a paved pathway that leads westward downhill to the ADA

observation platform and provides parking for people with disabilities. The upper parking lot is rimmed with 40 designated, paved RV parking slots. Fire rings and 20 picnic tables are available surrounding the paved lot (Bird Creek Overflow Campground). Water and latrines are available. During summer, a volunteer campground host offers assistance and answers questions. The upper lot is within MOA's Bird Creek Regional Park, which is managed by CSP as part of the park through an agreement. CSP day-use fees are assessed at the lower lot, and CSP overnight camping fees are assessed at the upper lot. The Bird Creek Overflow Campground feature can be viewed on Appendix A, page 21, while the Bird Creek Overflow Parking feature can be viewed on Appendix A, page 22.

**Use and Impact.** The Proposed Action would include a frontage road within this area. The ROW would not expand within this area, but the current lower parking lot located within the ROW would be eliminated by the new frontage road. The existing disability parking within the DOT&PF ROW, on the western (creek side) of the campground driveway, would be maintained, as well as the dirt trail that connects the upper lot to the disability parking and paved pathway to Bird Creek. Refer to the EA Appendix F Proposed Action Mapbook, page 22, to view conceptual design in the Bird Creek Overflow Parking and Campground area vicinities.

DOT&PF would reconstruct impacted trails, extend a trail east of Bird Creek to connect with the frontage road, and continue to provide ADA access and parking where the pathway connects to the campground driveway.

Project noise modeling indicated that the existing overflow campground would experience an increase in traffic noise. Traffic noise would increase from 58.4 decibels (dB; 2024 existing highway) to 66.9 dB (Proposed Action in 2052), exceeding the FHWA Noise Abatement Criteria for recreation areas. The 2052 No Build Alternative noise level would be 59.6 dB, very similar to the existing noise level. Per consultation with the OWJ, the campground functions for campers/RVs and the increase in noise is consistent with the location and expectations of the facility. The facility is adjacent to the existing highway, where serenity and quiet are not overarching expectations of the facility. See the noise study in EA Appendix O *Noise Assessment/Evaluation* for more details on the noise modeling process and results.

### **3.2.2.16 BIRD CREEK CAMPGROUND**

**Background.** The Bird Creek Campground is located at Seward Highway MP 101 (refer to Appendix A, page 22). The campground is located on a portion of CSP land that lies between the ARRC and DOT&PF ROWs. It shares a driveway with the Bird Creek Trailhead, discussed in Section 3.2.2.17 and also featured on Appendix A, page 22.

The campground has 24 wooded camping sites open to tents or vehicles on a first-come, first-served basis and two public use cabins that can be reserved online (a third cabin was constructed in summer 2025 but is not yet available for rental). The campground has a water pump, fire rings, picnic tables, outhouses, and bear-safe food lockers. The configuration of the campground puts some campsites closer to the highway and some closer to the railroad. The camp sites are buffered from the transportation facilities by trees and shrubs within the DOT&PF and ARRC ROWs and on park land. A summer season campground host offers assistance and answers questions. The campground has multiple trail connections to the Indian to Girdwood Bike Path.

**Use and Impact.** In the Proposed Action, the DOT&PF ROW would not expand within this area, but the highway within the ROW would be built with a wider footprint to create separated lanes and a frontage road; refer to the EA Appendix F Proposed Action Mapbook, page 22, to view conceptual design in the Bird Creek Campground vicinity. No encroachment into the campground area would occur. The nearest lane to the campground would be approximately 40 feet closer to the campground, and the forested buffer would be narrower than existing conditions within this area. The campsite nearest to the highway at the western end of the campground would be 170 feet from the nearest lane rather than the 210 feet under current conditions. The campsite nearest to the highway at the eastern end of the campground would be 110 feet from the nearest lane; currently it is 150 feet from the highway. It is likely that the design would call for the ROW to be cleared to its edge, particularly near the eastern end of the campground, and the remaining forest buffer would be narrow at the eastern end; it is anticipated that highway traffic would be visible from the eastern end of the campground. Six of the campsites and two of the three public use cabins would be most affected by these changes. Traffic noise modeling for this Project indicated that noise would be virtually unchanged in the campground as a whole and at the campsites nearest the highway (EA Appendix O *Noise Assessment/Evaluation*). Noise levels were modeled at each campsite, ranging from 48.1 dB (Campsite #18, farthest from highway) to 61.3 dB (Campsite #1, nearest to the highway at the campground entrance) under the 2024 existing conditions. Under the No Action alternative, future (2052) noise levels would increase with growing traffic volumes to range from 49.3 to 62.5 dB. The Proposed Action would also increase from 48.3 to 61.7 dB in 2052, which is more than existing but less than the No Action alternative. This is a result of the centerline shifting away from the Bird Creek Campground. The anticipated changes in noise levels do not result in substantial impacts per FHWA regulations and the DOT&PF Noise Policy.

### **3.2.2.17 BIRD CREEK TRAILHEAD**

**Background.** CSP manages a trailhead at the community of Bird Creek for the Indian to Girdwood Bike Path, a designated National Recreation Trail. The trailhead entrance is located at Seward Highway MP 100.8 and has 20 parking spaces, a vault toilet, and a fee and information kiosk. It shares a driveway with the Bird Creek Campground (Section 3.2.2.16). The trailhead is open year-round; during winter, CSP grooms part of the trail for cross-country skiing. The driveway from the highway and the trailhead are owned by the MOA and managed by CSP by agreement. Bird Creek Trailhead can be viewed on Appendix A, page 22.

**Use and Impact.** The highway would be expanded to be a divided highway with a frontage road, and all work would be completed within the existing ROW. Most of the construction would occur on the mountain side of the existing highway, but the water side (toward the trailhead) would also be expanded. The ROW, which currently has relatively wide forested areas on each side of the highway, would likely be cleared to the ROW limits, given that the toe of fill would come to within approximately 30 feet of the ROW. This would leave a thin visual buffer. The distance from the nearest parking space in the trailhead lot to the edge of the nearest lane would be reduced from approximately 180 feet to approximately 140 feet.

### **3.2.2.18 ROCK CLIMBING AREAS**

**Background.** The Project study area includes many rock climbing and bouldering areas. Rock ridges and cuts adjacent to the Seward Highway hold the majority of easily accessible rock-

climbing areas close to Anchorage. Some of the appeal is the easy access provided by the highway corridor. Most of the parking areas for access to these climbing routes are within the DOT&PF ROW, including trailheads and scenic overlooks, but also formal or informal pullouts that provide parking just beyond the highway shoulders. Many of the climbing routes are wholly within the DOT&PF ROW or start within it. Other areas are only accessible from the highway but require several minutes of hiking into the park. Climbing areas that are wholly within the DOT&PF ROW are not considered Section 4(f) resources and are not evaluated in this report, but are addressed in Appendix B and EA Section 3.3.11 Parks and Recreation.

Guidebooks and online sources viewed for this Project describe 28 named climbing areas and over 300 specific rock-climbing routes, ice climbing, and bouldering areas along the Seward Highway between MPs 100 and 114. Appendix B Table 3.2 lists the areas and summarizes typical and/or recommended parking and access.

Table 3-1 identifies climbing areas that DOT&PF determined were protected under Section 4(f).

**Table 3-1. Rock climbing impacts at areas subject to Section 4(f)**

Climbing Area <sup>a</sup>	Milepost	Impact
Sea Cave	114.0	No impacts; refer to Appendix A, page 6
Picnic Rock	113.9	No impacts; refer to Appendix A, page 6
Grunge Wall	113.3	The parking and climbing are at a pullout on the mountain side of the Grunge Wall amphitheater, just north of an area known for ice accumulation. The access and climbing features would be eliminated due to rock cuts for the road alignment; refer to Appendix A, page 7.
Crack in the Woods	112.7	This area is estimated to be 5.4 acres and is currently vegetated to the highway. Approximately 0.8 acre of the climbing area is within the existing DOT&PF ROW, and the Proposed Action would acquire another 1.4 acres of the climbing area as it is shifted into the mountain side (the shift would vary from 61 to 285 feet). Approximately 41% of the climbing area would be impacted. The proposed northbound lanes would remain within the existing ROW, but the cut line would fall outside the existing ROW by up to 85 feet to accommodate the area needed for the clear zone, rock cuts, and future maintenance of the cuts. The steep, forested mountainside would be replaced by a rock cut, eliminating parts or all of the climbing routes; refer to Appendix A, pages 7 and 8.
Pivot Point	112.4	This area is approximately 7.5 acres and is currently vegetated to the highway. Approximately 1.4 acres is within the existing DOT&PF ROW, and approximately 1 acre of the climbing area would be acquired for new highway ROW. Approximately 2.4 acres (32%) of the climbing area would be impacted by Project construction. The actual climbing routes of two preferred climbs (Pivot Point, Teenage Dome) appear to be unaffected, although existing access to the area would be eliminated by the Proposed Action; refer to Appendix A, page 8.
Boy Scout Rocks	112.1	No impact is anticipated to the climbing, nor would access be precluded; however, there may be modifications to existing social trails between the highway and climbing area, and adjacent climbing within the DOT&PF ROW (not evaluated as Section 4(f)) that may shift usage patterns; refer to Appendix A, page 8.
Resolution Bluff/Der Rhinecrag	111.3	Resolution Bluff is approximately 0.5 acre, and approximately 70% would be acquired for rock cuts and new ROW under the Proposed Action. Climbing is anticipated to be eliminated. The entirety of the Der Rhinecrag climbing area would be acquired for new rock cuts and ROW. Climbing would be eliminated; refer to Appendix A, page 9.

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Climbing Area <sup>a</sup>	Milepost	Impact
Sunshine Ridge Area: Multiple Climbs	110.1	Climbs named Sunshine Ridge, Ursa Minor, Glak's Place/Tree Fort, and Morning Star Gully/Jewel in the Rough would be physically unaffected by the Proposed Action. However, vehicle access to the existing Sunshine Ridge Parking (small parking area) would be eliminated. The nearest parking would be at Beluga Point Viewpoint. A pedestrian tunnel would be provided for access between Sunshine Ridge and the Beluga Point Viewpoint parking area via the multi-use trail; refer to Appendix A, page 10.
Northwest Passage	109.8	The inland highway ROW line within this location would not change. However, rock cuts within the existing ROW would likely affect the base of the climbing areas and shorten existing climbing routes. Parking at the MP 109.8 pullout would be eliminated. The nearest parking would be at Beluga Point, and access would be via the new multi-use pathway and pedestrian tunnel spur under the Seward Highway; refer to Appendix A, page 11.
Sky Pilot	109.5	The proposed ROW would move into the mountain side approximately 195 feet, and a cut would be created approximately 250 feet high. This would also eliminate the Sky Pilot climbing area; refer to Appendix A, page 11.
Goat's Head Soup	106.9	The ROW would shift inland, and a rock cut up to 150 feet high would effectively eliminate the existing climbing area; refer to Appendix A, page 14.
Son of Kong	106.7	The rocky outcropping that forms this climbing area on the water side of the railroad (across from the Windy Corner Trailhead) would be altered to become a viewpoint with trails and wildlife viewing scopes. Portions of the climbing area may be altered by this construction, and the rocks would no longer be surrounded by submerged lands; refer to Appendix A, page 14.
Dino Head	106.1–105.9	The ROW would shift inland a few feet. The Proposed Action would not physically affect this climbing area. Access is typically at a water-side pullout across the existing highway. After construction, the nearest parking would be at the Windy Corner Trailhead and near MP 106.5, and would require a walk along the highway shoulder approximately 0.5 mile to the climbing area; refer to Appendix A, page 15.
Bird Creek Boulders	101.5	The ROW within this location would shift slightly inland. The rock cut would affect the trail to Bird Creek Boulders, which would be rebuilt, and would eliminate some climbing near the highway; refer to Appendix A, page 21.

<sup>a</sup> Climbing areas and routes are difficult to identify with high accuracy. Best estimates have been made based on climbing guidebooks, aerial photographs, and consultations with climbers and climbing groups. The area name is usually taken from the name of a particular rock feature or climbing route. Other features and named climbing routes may occur within the same area.

**Use and Impact.** This discussion is focused on cliffs used as climbing areas that DOT&PF has determined to be protected by Section 4(f).

Existing pullouts used as parking for these climbing areas are discussed, but many of the parking areas are not subject to Section 4(f) protection. In general, if parking pullouts that currently exist are for multiple purposes and not connected with the park by a substantive trail or road, DOT&PF determined that Section 4(f) does not apply to them. Those parking areas that are protected under Section 4(f) are individually discussed above in this document.

Impacts of the Proposed Action on the climbing areas occur when new rock cuts for the expanded highway eliminate all or part of an existing climbing route. Past highway construction and blasting often created cliffs attractive to rock climbers within the DOT&PF ROW. Similarly, any blasting or rock cut activities associated with this Project's proposed highway improvements have the potential to create new rock faces attractive to climbers, but the anticipated less-steep

angle of the faces and any rockfall netting that might be placed over some sections would discourage future climbing. For the purposes of this evaluation, it is assumed that new rock faces would not be usable for recreational climbing.

Impacts also include alteration of access to any climbing route that is subject to Section 4(f), even if the route itself is unaffected. Table 3-1 describes the impact to the climbing features and routes that begin within the DOT&PF ROW and proceed into, or are wholly within the park, which are the ones that DOT&PF determined are subject to Section 4(f) protection.

### **3.2.2.19 TURNAGAIN ARM TRAIL**

**Background.** The Turnagain Arm Trail is a 9.5-mile hiking trail on the historic route also known as the Potter Connecting Trail. As indicated by markers along the trail, the route is designated as part of the INHT system. The trail roughly parallels the Seward Highway on the mountainside above the highway, following an early 1900s cut made for horses, foot traffic, and perhaps dogsleds while the railroad was under construction and mail was still hauled by trail from Seward to the Interior and points between.

CSP currently manages the trail for recreation. Its trailheads are Potter Creek (MP 115), McHugh Creek (MP 112), Rainbow (MP 108), and Windy Corner (MP 106). Each trailhead is addressed separately in this document. The trail connects with the McHugh Creek and Rabbit Lake Trails, allowing for a passage of approximately 13 miles through two valleys. The Turnagain Arm Trail is a hiking trail—bicycles and motorized vehicles are not allowed. Beyond Windy Corner to the southeast, the historic trail continues but is overgrown and, in some places, washed out by deep erosion cuts; in some places, it is difficult or impossible to follow or find. It connects to the Falls Creek Trailhead and informal Indianhouse Mountain Trail, both addressed separately in this document. CSP has indicated an intention to extend/rebuild the trail from Windy Corner to Falls Creek.

**Use and Impact.** The majority of the 9.5-mile trail would remain intact. One area of the trail, an approximately 0.6-mile-long segment above Seward Highway MPs 107.4 to 108, would be eliminated by the rock cut for the expanded highway. DOT&PF would work with CSP to reroute the trail farther uphill. The current design is a “placeholder” design and shows the rerouted segment as a straight line. In the final design, the route would be created following CSP design criteria and would work with the existing topography to create a pleasant trail with minimal clearing. The trail would otherwise be physically affected only at trailheads.

The Proposed Action would change the trail experience in some locations. At the following locations, the highway rock cut could approach within 50 feet of the trail, based on preliminary design of the Proposed Action :

- MP 107.3 (separated approximately 50 feet at one point; refer to Appendix A, page 14)
- MP 108.2 (separated 10 to 50 feet for approximately 200 feet; refer to Appendix A, page 13)
- MP 110.5 (separated 7 to 10 feet for approximately 215 feet; within 50 feet for approximately 330 feet total; refer to Appendix A, page 10)
- MP 113.3 (separated 8 to 15 feet for approximately 175 feet; within 50 feet for approximately 290 feet total; refer to Appendix A, page 7)

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- MP 113.4 (separated 8 to 12 feet for approximately 35 feet; within 50 feet for approximately 185 feet total; refer to Appendix A, page 7)
- MP 113.7 (separated 9 to 12 feet for approximately 35 feet at two locations; within 50 to 60 feet for approximately 330 feet total; refer to Appendix A, page 6)
- MP 114.7 (separated 7 to 15 feet for approximately 250 feet at two locations; within 50 feet for approximately 480 feet total; refer to Appendix A, page 5)

The proximity of the cliff edge would change the experience on the trail, including increased exposure to the edge as a potential attractive nuisance/fall hazard as people try to peer down or as erosion occurs; and likely greater views (fewer trees), including some views that would include the highway below. The trail would be realigned farther uphill at the locations where the final rock cuts are close to the existing trail; those locations would be identified after final construction and in coordination with CSP officials.

### **3.2.2.20 INDIAN TO GIRDWOOD BIKE PATH, INCLUDING EXISTING SPUR TRAILS**

**Background.** The Indian to Girdwood Bike Path is a CSP pathway built roughly parallel to the Seward Highway. It is a paved, multi-use, non-motorized pathway; is used by the local communities it connects; and is a destination trail for cyclists from Anchorage and elsewhere who drive to it. It is a designated National Recreation Trail. The trail weaves in and out of the DOT&PF ROW and provides a variety of settings, from forested, to open with views of Turnagain Arm, to semi-urban near Indian and Bird. It has formal trailhead parking lots at Bird and Indian as well as Bird Point and Girdwood outside the Project area, and it has several informal access points at pullouts. Multiple access points are within the Bird Creek Campground, and informal access points are at three pullouts (MPs 103.8, 99.9, and 99.4) where the trail is connected to the pullout.

The trail within the Project area runs from Seward Highway MPs 98.5 to 103.8 (5.3 highway miles, estimated at least 5.5 trail miles because of the trail's curves). Within the Project area, approximately 3.2 miles of the bike path are located within the DOT&PF ROW, slightly more than 1 mile of the bike path is located within the ARRC ROW, and approximately 1.3 miles are located on CSP or MOA land. At Seward Highway MP 98.8 (refer to Appendix A, page 24), the trail passes under the highway in a tunnel, then runs along the water side of the highway through most of the Project area. It passes again beneath the highway at the Indian Creek bridge (MP 103; Appendix A, page 19), so in the western part of the Indian community, it is on the mountain side of the highway. The trail is mostly widely separated from the highway, allowing for a high-quality recreation experience in which all users are separated from traffic and risk posed by fast-moving vehicles. The trail crosses driveways in Indian, but the rest of it is free of driveway crossings. Of the 5.5 trail miles, approximately 0.7 mile (less than 13 percent) is separated from the nearest highway lane by 10 feet or less, and these areas are mostly associated with the Indian and Bird Creek crossings. The rest of the trail, where it is relatively close to the highway, is typically separated by 35 to 70 feet. Long segments have much greater separation, where the trail winds through the trees and is not close to the highway.

At the Bird Creek community, near Seward Highway MP 100.5, a highway underpass and short spur provide access from the main Indian to Girdwood Bike Path to the eastern part of the community near Konikson Road (refer to Appendix A, page 22). Closer to Bird Creek, a

pedestrian spur trail passes under the Bird Creek highway bridge, connecting the Indian to Girdwood Bike Path (which crosses over the creek on the highway bridge) to the Bird Creek fishing platforms as well as pathways to the Bird Creek Access parking lot and the Bird Creek Overflow Parking and Campground. Fishing access trails and large parking lots occur on the mountain side of the highway. All the trails and spurs, whether occurring within or outside the DOT&PF ROW, are managed by CSP.

**Use and Impact.** The widened highway footprint would overlap the trail in several locations. DOT&PF and CSP have an agreement discussed in Appendix B, Section 3.4 regarding the trail. For the 3.2 miles of pathway where the trail occurs within the DOT&PF ROW (near MPs 99.5, 100, and 101 to 102), its location is not specific, and DOT&PF may relocate the trail as long as the continuity of the trail is maintained. The Proposed Action's use of the trail within the existing ROW is therefore excepted per regulations (23 CFR 774.13(f)(3)) from the requirements of Section 4(f). However, in this case, portions of the trail occur outside the existing ROW that would be affected by the Proposed Action, and the exception at 23 CFR 774.13(f)(3) would not apply in these areas. These effects are discussed below.

The Proposed Action would require relocation of the trail at four locations where the trail is outside the current ROW, totaling approximately 1,880 feet (0.36 mile), and the rerouted trail would be located outside the DOT&PF ROW. At these locations, therefore, the exception does not apply, and these portions of the trail are subject to Section 4(f) approval as the trail would become part of CSP at these locations. The Proposed Action typically locates the rerouted portions of the trail so the edge of the trail would be 10 feet from the edge of the paved shoulder or 18 feet from the nearest lane. Where the existing pathway occurs within the Project area (Seward Highway MPs 98.5 to 103.8), approximately 1.4 miles of pathway (25 percent) would be located within 10 feet of the paved shoulder, approximately double the distance of the close-proximity trail that currently exists. Another 0.9 mile would be located adjacent to the new frontage road within the Indian area, within 8 feet of a lower-speed, lower-traffic road. Together, 42 percent of the trail after the Project's completion would be close to a roadway, up from 13 percent, reflecting a change in the trail experience.

In the Proposed Action, the Indian to Girdwood Bike Path main trail would pass over the Bird Creek highway bridge, reusing the same bridge and trail corridor. The Proposed Action shows the trail width as 6 feet for the bridge crossing, the same as existing conditions.

The trail spur and underpass near Seward Highway MP 100.5 in the eastern part of the Bird community would be rebuilt. A short main trail segment south of the highway would also be rerouted near the underpass.

At Seward Highway MPs 99.9 to 100, the Indian to Girdwood Bike Path would be reconstructed and the existing pullout there removed, eliminating an informal trail access point. At two locations on either side of the Seward Highway MP 99.3 pullout, where the trail is below the highway elevation and therefore separated both horizontally and vertically, a total of approximately 0.25 mile of trail would be reconstructed across new fill from the highway expansion above. The informal pullout at Seward Highway MP 99.3 would be removed, eliminating another informal trail access point. However, the trail spur within this area that provides access to the trail would be retained primarily for CSP access to the trail for

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maintenance or search and rescue. It would be accessible only from the southbound lanes (right in, right out).

The pathway tunnel for the Indian to Girdwood Bike Path under the highway at Seward Highway MP 98.8 would be reconstructed and lengthened to pass under the widened highway. The tunnel would be approximately 100 feet long.

In effect, the new multi-use path created by the Proposed Action would tie into the existing Indian to Girdwood Bike Path, functionally extending it 14.2 miles from the existing terminus at Seward Highway MP 103.8 in Indian to Rabbit Creek Road in Anchorage. The new multi-use pathway would be separated from the highway for the entire length of new pathway construction. The pathway would be located 10 feet from the paved shoulder, or 18 feet from the nearest lane, for the majority of the distance because of constraints of the rock bluffs inland as well as the railroad and Turnagain Arm seaward.

Once all construction is complete, the entire paved, multi-use pathway (newly extended Indian to Girdwood Bike Path) would have the following access points:

- MP 117.7, North Potter Marsh boardwalk parking lot: No direct connection by path but connected via existing marsh access driveway
- MP 115.4, South Potter Marsh Viewing Area: No direct connection by path but connected via a short segment of shoulder along Potter Valley Road
- MP 115, Potter Creek Trailhead: Rebuilt parking lot for Turnagain Arm Trail
- MP 111.8, McHugh Creek Day Use Area: Via underpass of the highway
- MP 106.6, Windy Corner Trailhead: Via underpass of the highway
- MP 110.3, Beluga Point: Large rebuilt parking lot
- MP 108.6, Rainbow Point: Rebuilt parking lot
- MP 103.1, Indian Creek: Replacement/relocated parking lot, located within the DOT&PF ROW near Boretide Road
- MP 102.9, Indian Creek Ballfield: Via small parking lot adjacent to proposed rebuilt ballfield
- MP 101.5: Underpass (with steps) at Bird to existing and rebuilt parking lots on either side of Bird Creek
- MP 100.8, Bird Creek Trailhead: Existing parking lot for Indian to Girdwood Bike Path
- MP 100: Underpass near Bear Creek/Little Penguin Creek to connect to the Bird community near Konikson Road
- MP 96.1, Bird Point: Existing parking lot beyond the Project limits
- MP 90, Girdwood: Existing informal parking along roads, beyond the Project limits

### **3.3 Historic Sites**

#### **3.3.1 Findings**

DOT&PF has determined through the Project's Section 106 process that the Proposed Action would have "No Adverse Effect to Historic Properties," and the SHPO) concurred on October 23, 2025. Additional details can be found in EA Section 3.3.5 Archaeological and Historical Resources, and the Project's cultural reports.

The Proposed Action would not encroach into the historic boundaries of the following NRHP-eligible or listed historic and archaeological properties, and would not use the following Section 4(f) historic sites within the Project corridor:

- Prehistoric Archaeological Site ANC-00054
- Prehistoric Archaeological Site ANC-00078
- Indian Valley Mine
- Diamond Jim's Sign
- Garage, Storage Shed, and Residence Historic Site
- Potter Section House

The Potter Section House is also a recreational 4(f) component of the CSP and is discussed as part of the park property in Section 3.2.

The above historic sites are not discussed further herein. Additional details can be found in EA Section 3.3.5 Archaeological and Historical Resources, and the Project's cultural reports.

### **3.3.1.1 TURNAGAIN ARM DISTRICT, ALASKA RAILROAD**

The Proposed Action would encroach upon the Turnagain Arm District, Alaska Railroad historic property. The Proposed Action would relocate the Alaska Railroad roadbed and tracks in several locations. The highway would, in some locations, encroach on the current location of the physical track as well as associated signs and signals. The track, and associated signs and signals, would be relocated seaward to make more room for the expanded highway.

Federal regulations at 23 CFR 774.13(a)(2) list an exception to the requirement for Section 4(f) approval for the "Improvement of railroad or rail transit lines that are in use or were historically used for the transportation of goods or passengers, including, but not limited to, maintenance, preservation, rehabilitation, operation, modernization, reconstruction, and replacement of railroad or rail transit line elements..."

Therefore, no Section 4(f) approval is required for the Turnagain Arm District, Alaska Railroad.

## 4 Avoidance Alternatives

As stated in Section 1.1, when a project will use Section 4(f) properties, FHWA regulations require a determination of whether there are any feasible and prudent avoidance alternatives. Federally funded transportation projects must avoid use of Section 4(f) properties if a feasible and prudent avoidance alternative exists. An avoidance alternative is one that avoids any and all Section 4(f) properties.

“Feasible and prudent avoidance alternative” is defined in 23 CFR 774.17 as:

- (1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
- (2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
- (3) An alternative is not prudent if:
  - (i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
  - (ii) It results in unacceptable safety or operational problems;
  - (iii) After reasonable mitigation, it still causes:
    - (A) Severe social, economic, or environmental impacts;
    - (B) Severe disruption to established communities;
    - (C) Severe disproportionate impacts to minority or low-income populations; or
    - (D) Severe impacts to environmental resources protected under other Federal statutes;
  - (iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
  - (v) It causes other unique problems or unusual factors; or
  - (vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

The ACWR and CSP are very large Section 4(f) properties. To completely avoid them would require (1) bypassing to the north or east; (2) bypassing to the south; (3) tunneling through curves while remaining within the ROW, as allowed under Section 4(f) law; (4) using alternative transportation modes; (5) using non-construction activities such as traffic demand management; or (6) selecting the No Action alternative.

Varying levels of planning and engineering design were expended to identify and analyze avoidance alternatives.

In the Project's EA, DOT&PF only evaluates the environmental consequences of the Proposed Action and No Action alternatives. These and other alternatives not considered further are discussed in EA Appendix D *Alternatives Development Memorandum*.

DOT&PF conducted preliminary engineering efforts to identify possible avoidance alternatives, including a qualitative analysis of the potential alternative corridors that would avoid all Section 4(f) impacts. In a series of workshops, Project engineers investigated multiple avoidance alternatives for their ability to meet purpose and need and avoid impacts to all Section 4(f) properties as well as for engineering feasibility, ROW impacts, complexity, and cost.

The following sections discuss options for avoiding the ACWR and CSP.

## **4.1 Bypassing to the North and East**

Both the ACWR and CSP extend far into the waters of Turnagain Arm, precluding shifting transportation corridors westward or southward along the coast to avoid impacts on the refuge or park. The alignment would be a route up the Knik River toward Lake George and down the Twentymile River valley, attempting to avoid all Section 4(f) protected properties along the route. This is the only route that has a chance of avoiding glaciers. However, the terrain within this area is high, mountainous, and geomorphologically complex. The road high point would be at elevation 3,400 feet or higher within an area with extreme snowfall. This route would travel through Chugach National Forest lands at Twentymile River and connect with the Seward Highway south and east of CSP near the head of Turnagain Arm.

The technical challenges would be immense, given the heavy snowfall, profusion of existing glaciers as well as active large and unpredictable glacial rivers, avalanche hazards in narrow valleys, and vast wetlands in the Twentymile River valley. Maintaining a roadway as well as keeping it operational and reliable would be difficult and very expensive. The environmental impacts of a new roadway within an area that is currently undeveloped, wild lands would be substantial. Furthermore, the U.S. Department of Agriculture, Forest Service's (Forest Service's) commemorative INHT route is planned on the northern slopes of the Twentymile River valley and is already constructed from Girdwood over Berry Pass into the Twentymile River drainage. The existing trail is a Section 4(f) property; the planned extension is part of a 100-mile trail from Seward to Crow Pass on Forest Service land and the Alaska Long Trail planned to extend 500 miles from Seward to Fairbanks. Congress granted the Bureau of Land Management (BLM) \$1 million in 2023 to study the feasibility of the trail qualifying for the National Trails System (BLM 2025). Such trails typically have very wide scenic buffers, especially on federal lands; should the study result in qualification, it could prompt the Forest Service to designate a recreation area or scenic trail buffer that would qualify as Section 4(f) property before the road could be built.

While this would certainly be a spectacularly scenic route, it would require drivers from Anchorage to drive northeast out of town 30 miles to the Old Glenn Highway before beginning to travel southward. Even if it were technically possible, the journey from Downtown Anchorage to the Seward Highway at the Twentymile River would be nearly 100 miles, compared to the

existing Seward Highway, which is 46 miles. The route may be somewhat efficient for Matanuska-Susitna Borough (Wasilla and Palmer areas) residents but not Anchorage residents. Unless the existing highway was closed, most Anchorage residents would continue to use the existing highway, as would travelers from the Kenai Peninsula Borough and Girdwood accessing Anchorage. The geometric safety problems on the Seward Highway would persist rather than being solved. The bypass route would be so out of the way that it would suggest an entirely different purpose and need.

DOT&PF has preliminarily determined this alternative is not prudent because it would not address the Project's purpose and need.

## **4.2 Bypassing to the South**

Creating a new highway south of CSP would likely require some variation of the following alignment: crossing Turnagain Arm on its southern side and connecting to the Hope Highway at Hope, then to the Seward Highway at the Hope Highway junction. To follow such a route would likely use ACWR land on the Anchorage side of Turnagain Arm as well as the Forest Service's Gull Rock Trail and Porcupine Campground/designated recreation area (including a trailhead for Hope Point Trail) on the southern side. These are Section 4(f) properties.

The ACWR wraps around Anchorage's southern and western shoreline, so avoiding it would mean attempting to cross Turnagain Arm in the Point Woronzof and Fire Island vicinity, which would require crossing the Tony Knowles Coastal Trail—a National Recreation Trail and Section 4(f) property—and putting two bridges (5 and 7 miles long) at Turnagain Arm's widest point. These bridges would affect the waterway that serves as important habitat for the endangered beluga whales, and the structure costs for 12 miles of new bridge would be extremely expensive (\$3 to \$6 billion). Landfall on the western/southern side of Turnagain Arm presumably would be at Point Possession near Chickaloon Bay, which is federal land of the Kenai National Wildlife Refuge, another Section 4(f) property.

DOT&PF has preliminarily determined this option is not a feasible and prudent avoidance alternative because there is no way to completely avoid Section 4(f) properties.

## **4.3 Double-Stacking the Highway Within the ROW**

Upgrading the Seward Highway to meet current design standards and other elements of the Project's purpose and need while remaining entirely within the existing DOT&PF and ARRC ROWs has been determined to be infeasible. Curve flattening, adding lanes for safety, adding pedestrian/multimodal facilities, and including rock catchment width requirements cannot be met entirely within the existing ROW.

The only possible way to stay within the existing ROW would be to double-stack portions of the highway, for example by elevating and placing northbound lanes on long bridges above the southbound lanes or railroad tracks. Bridges along the corridor length (approximately 20 miles) would be extremely expensive to build (over \$10 billion), and maintenance would be difficult and expensive. Additionally, because CSP has facilities protected by Section 4(f) that occur within the ROW, the task of avoiding any Section 4(f) property would likely be impossible. The structures would require ramps to exit and enter the elevated lanes, which would require large

footprints. Available space for these ramps to access park and refuge features without impacting the Section 4(f) resources is unlikely, and not providing access would also be an impact. Available space for these ramps within the communities of Rainbow, Bird, and Indian is limited. Even if such ramps could be built, they would cause substantial adverse visual, ROW, and access impacts to these small communities.

Because the costs of a stacked structure would be of extraordinary magnitude, and such structures and ramps would likely create severe disruption to access within local communities as well as ACWR and CSP features and attributes, DOT&PF has preliminarily determined this is not a feasible and prudent avoidance alternative.

#### **4.4 Tunneling Through Curves and Remaining Within the ROW**

For this Project, DOT&PF examined the potential use of tunnels at select locations such as Windy Corner. Combining tunnels with viaduct-style double-stacking of the highway lanes (see Section 4.3) could have better potential for avoiding ACWR and CSP lands than double-stacking alone. Under federal Section 4(f) guidance (FHWA 2012: Question 28), tunneling under a park can be a legitimate way to avoid use of the park. However, like long bridges, tunnels (especially long ones) are very expensive (\$65 thousand per linear foot +/- 50 percent based on geotechnical conditions) because they require mechanical ventilation, fire suppression, and fire escape measures. These would require delivering power to the tunnel site(s) and increase ongoing operating expenses in perpetuity. At the most likely place for a tunnel—Windy Corner—the tunnel portals would likely use portions of CSP outside the ROW, and the highway routing at the eastern portal would affect the Windy Corner Trailhead and Turnagain Arm Trail. Tunnels would need to be built large (high) enough to accommodate oversize loads because no alternative trucking route exists between Anchorage and the Kenai Peninsula.

Because of the cost and operational issues associated with tunnels and double-stacking the highway, and the likely involvement of CSP lands at tunnel portals, DOT&PF has preliminarily determined this is not a feasible and prudent avoidance alternative.

#### **4.5 Alternative Transportation Modes**

Ferry or hovercraft service on Turnagain Arm and enhanced rail or bus service within the corridor (public transportation) could be ways to address transportation needs safely between Anchorage and Rainbow, Indian, Bird, and Girdwood. In theory, they might be managed in ways that would avoid use of ACWR and CSP lands. To serve the summer traffic demand, the marine vessel or rail service would need to be extraordinary, and the logistics of loading and off-loading vehicles efficiently to continue to an immediate destination or farther south on the Seward and Sterling Highways would be an immense undertaking, with large operating costs for DOT&PF or some other entity. Typically, a substantial fee would be charged for such a service.

Because of the presence of the ACWR and CSP on the tidal flats, any ferry terminal would need to be located on the northern side of Anchorage, likely at the Don Young Port of Alaska in Anchorage, to avoid Section 4(f) properties. This would be an inconvenient location for most of the Anchorage population. It would make for a much longer journey for people entering Anchorage from the north seeking to pass through to Girdwood or the Kenai Peninsula.

Additionally, shallow waters, shifting sandbars, winter sea ice, bore tides, and extreme currents would make marine vessels on the scale needed impractical.

Even if the railroad was straightened to allow for greater speeds and double-tracked within the existing ROWs for greater efficiency, the process of loading and unloading automobiles would be cumbersome and time consuming for the motorist. The straightening and widening of the railroad tracks would require the use of CSP, which is a Section 4(f) property. ARRC previously transported automobiles through two tunnels from Portage to Whittier to connect with the Alaska Marine Highway System and Prince William Sound. DOT&PF undertook the Whittier Access Project to improve the railroad tunnels so motorists could drive themselves through the tunnels and avoid the bother, time, and cost of getting on and off the train.

Unless the existing Seward Highway was closed, most Anchorage residents would continue to use it, as would travelers from the Kenai Peninsula Borough and Girdwood accessing Anchorage. The geometric safety issues on the Seward Highway would persist rather than be resolved, even if a small percentage of traffic transferred to rail, ferry, or bus; therefore, the Project's purpose and need would not be met. The concept of marine vessels or trains serving virtually all needs within the corridor, if practical at all, is so different that it would suggest an entirely different purpose and need.

DOT&PF has preliminarily determined this is not a feasible and prudent avoidance alternative.

## **4.6 Non-Construction Activities**

DOT&PF considered an array of non-construction activities that have been suggested through public and agency comments on the Project to date, including Transportation System Management and Operations (TSMO), Transportation Demand Management (TDM), and expanded public transit and commuter rail service. Each of these activities, combined with relatively minor roadway improvements located entirely within the existing ROW, has potential to reduce traffic volume peaks. EA Appendix D *Alternatives Development Memorandum*, Section 1.5 provides greater detail on each of these non-construction activities. However, it is not expected that these measures would reduce traffic by enough to eliminate the safety hazards that currently exist. Many of the TSMO and TDM methods are designed principally for commuter traffic in large, multi-lane, urban environments and would not be appropriate for the Seward Highway. Implementing some of them would likely reduce traffic by only a small amount.

These activities/alternatives would also not address the safety issues of the existing highway. These include tight curves, rockfall hazards, limited opportunities to pass, limited ability for emergency vehicles to navigate road closures, a high density of direct highway access points, and no connected multimodal pathway. For these reasons, this alternative does not satisfy the Project's purpose and need, and DOT&PF has preliminarily determined it is not a feasible and prudent avoidance alternative.

## **4.7 No Action Alternative**

DOT&PF considered the No Action alternative as a Section 4(f) avoidance alternative. The No Action alternative would not construct any improvements. The No Action alternative does not satisfy the Project's purpose and need, and DOT&PF has preliminarily determined it is not a feasible and prudent avoidance alternative.

## 5 Measures to Minimize Harm

### 5.1 Mitigation Background

The USDOT Act requires that federally funded transportation projects undertake “all possible planning to minimize harm” to Section 4(f) properties, as noted in Section 1.1.

“All possible planning” is defined in FHWA regulation 23 CFR 774.17 as follows:

All possible planning means that all reasonable measures identified in the Section 4(f) evaluation to minimize harm or mitigate for adverse impacts and effects must be included in the project.

(1) With regard to public parks, recreation areas, and wildlife and waterfowl refuges, the measures may include (but are not limited to): design modifications or design goals; replacement of land or facilities of comparable value and function; or monetary compensation to enhance the remaining property or to mitigate the adverse impacts of the project in other ways.

(2) With regard to historic sites, the measures normally serve to preserve the historic activities, features, or attributes of the site as agreed by the Administration and the official(s) with jurisdiction over the Section 4(f) resource in accordance with the consultation process under [36 CFR part 800](#).

(3) In evaluating the reasonableness of measures to minimize harm under 23 CFR [§ 774.3\(a\)\(2\)](#), the Administration will consider the preservation purpose of the statute and:

- (i) The views of the official(s) with jurisdiction over the Section 4(f) property;
- (ii) Whether the cost of the measures is a reasonable public expenditure in light of the adverse impacts of the project on the Section 4(f) property and the benefits of the measure to the property, in accordance with [§ 771.105\(d\) of this chapter](#); and
- (iii) Any impacts or benefits of the measures to communities or environmental resources outside of the Section 4(f) property.

This section discusses measures that would minimize harm and potential means of avoiding use of components of the large ACWR and CSP Section 4(f) properties, including design modifications, replacement of land lost to the Project, or other enhancements to the Section 4(f) property. Historic properties are not addressed here, because the Project’s Section 106 process determined there would be no adverse effect to historic properties from the Project, so mitigation is not required (refer to EA Section 3.3.5 Archaeological and Historical Resources and Appendix Q Section 106 Consultation/Findings).

## 5.2 Design Measures That Would Minimize Use of Section 4(f) Properties

Because the Proposed Action would unavoidably use land from Section 4(f) properties, it is possible that design measures or alignment variations could minimize overall harm to Section 4(f) properties by avoiding important features within that property. This section analyzes design measures and other modifications that might minimize harm to Section 4(f) properties in this way. Section 4 describes other alternative concepts that DOT&PF has considered. Refer also to EA Appendix D *Alternatives Development Memorandum* for greater detail on alternative concepts not carried forward. The concepts that were not carried forward were determined to not satisfy the Project's purpose and need.

As indicated in Section 4, DOT&PF has determined that actual avoidance of all Section 4(f) properties is infeasible because of the broad areas covered by the ACWR and CSP, the linear nature of the recreational trails, the constraints of the Turnagain Arm shoreline as well as inland cliffs and steep mountain topography, and the Project's purpose and need. DOT&PF therefore considered whether modifications to the Proposed Action would have potential to minimize harm to Section 4(f) resources.

### 5.2.1 Anchorage Coastal Wildlife Refuge Features

The Proposed Action would use ACWR lands seaward (west) of the existing railroad alignment. It would avoid use of lands within Potter Marsh but would alter existing views of and physical access to the marsh by closing existing ACWR Wildlife Viewing Pullouts to use by vehicles. Instead, these pullouts would continue as wildlife viewing areas with the new access being a paved, multi-use pathway running the full length of the marsh. Consultation with ADF&G, the ACWR OWJ, indicated a strong preference for impacts to be minimized to the wetlands of Potter Marsh east of the Seward Highway because it is considered higher-value habitat for bird species and wildlife viewing than the mudflats on the water side of the railroad. The Proposed Action avoids the wetlands of Potter Marsh entirely by using the seaward mudflat habitats beyond the railroad, minimizing impacts on the ACWR.

The Proposed Action would use a small portion of the Ggeh Betnu Trail/Lot 205/Lot 178 at the Project's northern terminus. This use is associated with the need to place fill east of the Seward Highway outside the ROW to construct the separated multi-use pathway connection to the existing bike lane network on Rabbit Creek Road. This fill is the minimum needed to achieve ADA-approved grade for the multi-use trail. Additionally, the Ggeh Betnu trail segment that would be impacted would be constructed to a higher quality than the existing trail, minimizing harm to the trail overall.

## **5.2.2 Chugach State Park Features**

**Potter Section House, and Potter Locomotive and Interpretive Area (MP 115.2).** The Proposed Action would avoid most of the Potter Section House, and Potter Locomotive and Interpretive Area. These resources function as CSP's headquarters and a public interpretive site. The impacts would be to the existing parking capacity at the site. No space exists for a Seward Highway alignment shift that would further avoid impacts on the site without impacting more wetlands on the mountain side of the highway and Potter Creek Trailhead, described below. Section 5.4 addresses ways to minimize effects to parking without shifting the highway alignment.

**Potter Creek Trailhead (MP 115.1).** The Proposed Action would eliminate part of the Potter Creek Trailhead facility and rebuild the entire site. Because of the competing impacts on the Potter Section House and Potter Trailhead sites on opposite sides of the highway, the Proposed Action alignment already optimizes benefits and impacts.

**McHugh Creek Day Use Area (MP 111.8).** The Proposed Action alignment would not affect the developed McHugh Creek site, so no further design shift appears necessary to minimize harm to the developed day-use area.

**Beluga Point Viewpoint (MP 110.3).** At Beluga Point, the highway alignment would shift inland away from the existing Beluga Point Viewpoint. However, the Proposed Action would eliminate and rebuild the Beluga Point Viewpoint and parking to expand its capacity and incorporate the multi-use pathway. The multi-use pathway may also be able to use abandoned segments of the old highway to increase its separation from traffic. DOT&PF will examine such shifts to minimize effects to this viewpoint in consultation with CSP during final design.

**Sunshine Ridge Parking (MP 110).** The Proposed Action would result in closing the Sunshine Ridge parking area, although the new highway would be moved seaward and would not physically affect the parking area. This is part of the effort to reduce turning movements on and off the highway for added safety. Pedestrian access via a highway underpass would be built to provide access from the large parking area at Beluga Point to the Sunshine Ridge climbing area.

**Rainbow Trailhead (MP 108.4).** The Proposed Action would not encroach upon the existing Rainbow Trailhead, but access to the trailhead would be reconfigured.

**Windy Corner Trailhead (MP 106.6).** The Proposed Action would shift the highway away from the Windy Corner Trailhead as well as rebuild and expand it.

**Falls Creek Trailhead (MP 105.6).** The Proposed Action would shift the highway away from the Falls Creek Trailhead and reconstruct the parking lot within the space provided.

**Indianhouse Mountain Trailhead (MP 104.4).** The Proposed Action would eliminate the existing Indianhouse Mountain Trailhead (small parking pullout) but would reconstruct it and a trail segment. Shifting the alignment seaward theoretically could retain the existing pullout, but not without also shifting the railroad track substantially seaward, resulting in greater impacts to Waters of the United States (WOTUS), Cook Inlet beluga whale critical habitat, and CSP

submerged lands. As proposed, the Project would reconstruct the trailhead and affected trail segment to an equal or greater condition than currently exists. Shifting the highway and railroad alignments within this area would add substantial cost and time delay to this portion of the Project without truly minimizing harm to CSP at this location; therefore, DOT&PF does not consider such a design measure warranted.

**Indian Creek Trailhead (MP 102.9).** The Proposed Action would eliminate the Indian Creek Trailhead, which is the northern-most access point and parking area for the Indian to Girdwood Bike Path and the adjacent Boulder Ballfield. The expanded highway would also use an edge of the ballfield itself. For these two reasons, the Proposed Action would render the ballfield unusable as a community park/ballfield. Shifting the alignment slightly northward and eliminating the median spaces between the north- and southbound lanes as well as between the highway and frontage road (using physical barriers in place of medians) would possibly avoid use of the ballfield. But making space for the parking area and its driveway as well as the added widths needed for acceleration and deceleration lanes is not possible. DOT&PF has determined that relocating the ballfield and parking is the best option within this area.

**Bird Ridge Trailhead (MP 102.1).** The Proposed Action would be located no closer to the existing Bird Ridge Trailhead than the existing highway, and the parking area would be unaffected. No design shift measure is needed at this location because no physical effect to the trailhead would occur here.

**Bird Creek Access Parking and Trail (MP 101.6).** The Proposed Action would relocate the entrance to the Bird Creek Access parking lot from the eastern to western end of the lot, requiring reconfiguration of the circulation pattern within the lot but not otherwise affecting it. The existing paved pathway to Bird Creek and the existing dirt trail upstream would be impacted and replaced with realigned trail segments. A shift in the alignment within this area could avoid the trail and path impacts but would shift the highway into the railroad alignment, requiring the railroad to shift seaward. This, in turn, would move the highway closer to the Bird Creek Campground and require moving or eliminating the railroad's existing bridge over Bird Creek (note ARRC replaced the historic pony truss bridge in 2024-2025, so it is not considered in this document). DOT&PF does not consider the relatively minor impacts on the trail to warrant the cost and time delays of this design measure, or the potential impacts on the paved pathway, campground, and railroad bridge.

**Bird Creek Observation Platforms and Trail Connections (MP 101.4).** The Proposed Action would eliminate and reconstruct the observation platforms as well as the paved pathway for creek access on the eastern side of Bird Creek. Any design measure to avoid these features would shift the entire highway toward the railroad and railroad bridge, and shift these seaward. It would also shift the highway into the Bird Creek Campground. Because of the cost and time delay, as well as any impacts on the Bird Creek Campground, DOT&PF does not consider such a design measure warranted for trails that would be replaced in-kind.

**Bird Creek Overflow Parking and Campground (Bird Creek Regional Park) (MP 101.3).** The Proposed Action would eliminate the lower overflow parking lot. The driveway to the parking area and campground would no longer connect to the highway but instead be at the end of the proposed frontage road. DOT&PF is committed to configuring the access road, parking,

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and trail that leads to the ADA-accessible fishing platform, so these features all meet ADA accessibility standards. Any design measures to avoid these features would shift the entire highway into the railroad and the railroad bridge, and shift these seaward. It would also shift the highway into the Bird Creek Campground. Due to the cost and increased environmental impacts of such a design measure, as well as any resulting impacts on the Bird Creek Campground, DOT&PF does not consider an alignment shift here reasonable.

**Bird Creek Campground and Bird Creek Trailhead (MP 100.7).** The Proposed Action would remain within the DOT&PF ROW adjacent to the Bird Creek Campground and Bird Creek Trailhead parking lot, but it would expand the highway footprint so the nearest lane and traffic would be closer to these park features. Removal of vegetation is unavoidable within this area; however, clearing limits would be minimized to just beyond the construction footprint, where possible. DOT&PF considered a design measure to move the highway away from the campground, but this would shift the frontage road intersection outside the ROW into private property and a building. Because the highway expansion remains within the ROW without any Section 4(f) use of the campground, DOT&PF does not consider an alignment shift here reasonable.

**Rock Climbing Areas (multiple sites).** The Proposed Action would eliminate multiple rock-climbing opportunities and alter access to several other rock-climbing areas. Any climbing areas on the mountain side of the highway could be avoided entirely by shifting the entire alignment seaward between approximately MPs 109 and 114. However, a seaward shift would risk affecting the few climbing areas that occur on the water side of the highway. Additionally, an important component of the Proposed Action is holding the rail alignment at its current location wherever possible so the Project can be built with minimal delay, and impacts on WOTUS, beluga whale critical habitat, and CSP can be minimized. DOT&PF rejected the added expense and time delay of realigning the railroad and then building the highway as unreasonable during the alternatives development process because it would add almost a decade of construction time to the Project.

**Turnagain Arm Trail (MP 107.7 and MP 115).** The Proposed Action would eliminate and rebuild segments of the existing Turnagain Arm Trail at the Potter Trailhead and, over more than 0.5 mile, near MP 107.7. Shifting the alignment seaward to avoid the trail at the Potter Trailhead would not be possible without further affecting the Potter Section House site across the highway. A design measure shifting the alignment near MP 107.7 would potentially avoid the trail but impact the railroad, pushing it seaward approximately 1.5 miles. An important component of the Proposed Action concept is holding the rail alignment at its current location wherever possible, so the Project can be built with minimal delay and costs, and impacts on WOTUS, beluga whale critical habitat, and CSP can be minimized. Although the trail would not be on its current alignment within this area after construction, it would be expected to retain a similar character and retain its continuity as a through-trail. Rebuilding this trail segment would create fewer environmental impacts compared to additional impacts on WOTUS and beluga whale critical habitat required to relocate 1.5 miles of railroad seaward.

**Indian to Girdwood Bike Path, including Existing Spur Trails (MPs 90–104).** The Proposed Action would overlap and impact the Indian to Girdwood Bike Path in multiple locations but would rebuild affected segments. Segments that occur within the existing DOT&PF ROW are

excepted and not considered Section 4(f) use. Affected segments outside the existing ROW are few and typically located where the fill footprint of the new roadway embankment would bury the existing pathway (e.g., two locations near MP 99.3). It would be possible to shift the alignment to minimize the need for these fills or build a retaining wall immediately uphill of the existing pathway to avoid covering the pathway. However, shifting the alignment would use CSP land uphill of the highway, and retaining walls are expensive. It would be substantially less expensive to reconstruct the pathway across the embankments, and the resulting pathway environment would be more natural once vegetation grows back.

### **5.2.3 Historic Site Features**

**Historic Properties.** The Proposed Action would have no Section 4(f) use of the historic properties within the Project corridor. With a “no adverse effect” finding for the Proposed Action under the Project’s Section 106 process, there is no need to consider changes in design or design shifts to minimize harm to historic sites/properties.

## **5.3 Measures to Minimize Harm: Anchorage Coastal Wildlife Refuge**

This section describes design changes and other commitments that minimize harm on the ACWR in response to ADF&G (the OWJ) requests and public comments to avoid and minimize impacts to particular features within ACWR. See Appendix C Officials with Jurisdiction Mitigation Requests and Responses for more detail on specific requests and DOT&PF responses. The commitments are:

- DOT&PF would hold the existing eastern edge of the Seward Highway in Potter Marsh and expand the highway toward Turnagain Arm to preserve the productive wetland habitat of Potter Marsh.
- DOT&PF would build the multi-use pathway through the ACWR area along the edge of Potter Marsh, without further fill in the marsh, for pedestrian access to the marsh edge and to connect three existing ACWR Wildlife Viewing Pullouts along the highway and the South Potter Marsh Visitor Facility at the southern end of the marsh.
- DOT&PF would replace an impacted portion of the existing Ggeh Betnu Trail with the Project’s multi-use pathway and connect it with the remaining portion of the Ggeh Betnu Trail for continued ACWR access.
- The Proposed Action would satisfy the requirements of the fish passage memorandum of agreement between ADF&G and DOT&PF for all anadromous fish streams; at Rabbit Creek, it would be designed to maintain water levels in Potter Marsh.
- The Proposed Action provides a few more parking spaces at the Potter Creek Trailhead and expanded parking at major CSP facilities along the entire path (Beluga, Rainbow, Windy Corner, and Indian Creek). DOT&PF will provide modest additional parking for the multi-use pathway if a suitable location is identified and commits to further discussion with ADF&G, MOA, and CSP before final design regarding suitable access to the northern end of the multi-use pathway.
- DOT&PF commits to reopening existing cooperative agreements during final design of the Potter Marsh segment to update the agreements, as necessary.

- The Proposed Action would provide separation between the multi-use pathway and the existing North Potter Marsh Visitor Facility/Boardwalk.
- DOT&PF commits to working with ADF&G during final design to identify reasonable maintenance and refurbishment work that DOT&PF can complete while equipment is on site near the three viewing pads along Potter Marsh.
- DOT&PF commits to providing reasonable signage in the Potter Marsh area in consultation with ADF&G during final design.

## **5.4 Measure to Minimize Harm: Chugach State Park**

The following section describes measures to minimize harm on CSP. DOT&PF consulted multiple times with ADNR-DPOR and CSP to address the identification of Section 4(f) properties, avoidance alternative considerations, and use and measures to minimize and mitigate harm. See Appendix C for more detail regarding OWJ requests and DOT&PF responses as well as consideration of mitigation measures. The commitments are:

- Under Section 6(f) of the Land and Water Conservation Fund (LWCF) Act, DOT&PF would replace CSP land lost to the expanded highway ROW with new lands that would be added to park ownership and management. Section 6(f) requires that the assessed values be equal or greater, and under the Proposed Action approximately \$300,000 worth of land with comparable recreation value would be added to the park to compensate for the loss of land along the new highway.
- DOT&PF would require construction contractors to make a maximum reasonable effort to keep CSP's public access locations, especially all trailheads, open during construction. The trailheads would likely close completely only when the Project is rebuilding the trailhead itself or working on the highway directly in front of the trailhead such that there is no reasonable option for access.
- DOT&PF would require construction contractors to undertake advance planning and public notification to make sure users are far away from blasting and other construction areas, with special emphasis on areas the public uses near the tops of existing bluffs.
- DOT&PF would install wayfinding signs and advanced notice of park features for drivers.
- DOT&PF is committed to:
  - Replacing impacted parking at Potter Section House (at that location or nearby)
  - Rebuilding all impacted facilities at the Potter Creek Trailhead
  - Rebuilding and expanding the Beluga Point Viewpoint
  - Rebuilding and expanding the Rainbow Trailhead with a vault toilet
  - Rebuilding and expanding the Windy Corner Trailhead with Dall sheep viewing facilities and a vault toilet
  - Rebuilding the Falls Creek Trailhead with added capacity
  - Rebuilding the Indianhouse Mountain Trailhead
  - Relocating and rebuilding the Indian Creek Trailhead
- DOT&PF will provide grade-separated crossings for the multi-use pathway extension (the trail itself) or for spur trails at five new locations:
  - Potter Creek Trailhead (MP 115.1)

- McHugh Creek Day Use Area (MP 111.8)
- Beluga Point Viewpoint/Sunshine Ridge (MP 110.1)
- Windy Corner Trailhead (MP 106.6)
- Community of Indian near Indian Valley Mine (MP 104.1)
- Additionally, DOT&PF has committed to reconstructing four existing underpasses:
  - Indian Creek (MP 103)
  - Bird Creek (MP 101.4, pedestrian only)
  - Bird Community Trail Connection (MP 100.5)
  - Bird Flats, near the Project's southern terminus (MP 98.9).
- Except for the crossing near Indian Valley Mine (MP 104.1) and underpass at Bird Flats (MP 98.9), these are connections to CSP facilities where the public could access the pathway or pathway users could access the park facility.
- The Proposed Action provides turning lanes and direct access from both directions at:
  - Potter Trailhead (via Potter Valley Road)
  - DOT&PF Weigh Station (not a park facility, but would provide a turnaround opportunity)
  - McHugh Creek Day Use Area
  - Beluga Point Viewpoint
  - Rainbow Trailhead
  - Windy Corner Trailhead
  - Indian Creek Trailhead for the Indian to Girdwood Bike Path (via the frontage road accessed from Boretide Road)
  - Bird Creek Access Parking
  - Bird Creek Overflow Campground (via frontage road)
  - Bird Creek Campground
- The Proposed Action would not create any material sites within the Project area. Ample material would be generated by cuts and excavation required within the proposed road footprint. Therefore, DOT&PF does not propose mitigation related to material sites.

#### **5.4.1 Potter Section House, Potter Locomotive and Interpretive Area, and Potter Creek Trailhead**

DOT&PF commits to the following measures to minimize harm on the Potter Section House, Potter Locomotive and Interpretive Area, and Potter Creek Trailhead:

- DOT&PF would connect the Potter Creek Trailhead to the Section House complex via trail spur from the multi-use pathway. The current plan calls for the multi-use pathway to pass under the highway near Potter Creek, adjacent to the trailhead. Extending a trail spur from this location to the Section House parking lot would add approximately 180 feet of trail construction and possibly a bridge for the trail. Accommodating the pathway in this way may require work that would encroach on the railroad track as it crosses Potter Creek. Design details would be addressed during final design.

- DOT&PF would replace the impacted parking at the Potter Section House, and Potter Locomotive and Interpretive Site either onsite or nearby.
- At the Potter Creek Trailhead, DOT&PF would replace the lower and upper parking areas with the same or greater capacity than current conditions, and would replace the trailhead overlook and kiosk, the start of the trail, and the vault toilet, unless the toilet could be avoided in final design. The site would be landscaped and replanted with native vegetation. Design of the site would be in consultation with or provided by CSP, at CSP's discretion.

#### **5.4.2 McHugh Creek Day Use Area**

DOT&PF commits to the following measures to minimize harm on the McHugh Creek Day Use Area:

- DOT&PF would retain the existing lower parking lot, located within the DOT&PF ROW, unchanged.
- The Proposed Action would include a grade-separated pedestrian crossing of the highway. This could be a grade-separated crossing for a spur trail or for the main pathway.
- DOT&PF is committed to working with CSP to build or rebuild trails or viewpoints affected by blasting west of the day-use area and to build alternative access, if needed, to the Crack in the Woods and Pivot Point rock climbing areas.

#### **5.4.3 Beluga Point Viewpoint**

DOT&PF commits to the following measure to minimize harm on the Beluga Point Viewpoint:

- The Proposed Action would upgrade, rebuild, and expand the scenic viewing area with an ADA-compliant pedestrian crossing over the railroad tracks to CSP lands outside the ARRC ROW. DOT&PF would work with CSP and trail advocacy groups during final design to ensure the site would work as well as possible for all users.

#### **5.4.4 Sunshine Ridge Parking**

DOT&PF commits to the following measure to minimize harm on the Sunshine Ridge Parking:

- DOT&PF commits to providing a pedestrian underpass of the highway to connect the Sunshine Ridge area on the mountain side of the highway to the Beluga Point Viewpoint on the water side. This could be a grade-separated crossing for a spur trail or for the main pathway.

#### **5.4.5 Rainbow Trailhead**

DOT&PF commits to the following measures to minimize harm on the Rainbow Trailhead:

- DOT&PF would rebuild the trailhead parking and connect the Turnagain Arm Trail to the parking area. DOT&PF would replace the capacity and function of the trailhead and expand the trailhead capacity, if desired by CSP.

- The Proposed Action would provide parking adjacent to the multi-use pathway at the Rainbow Point Scenic Overlook.
- DOT&PF would completely reconstruct the Rainbow Trailhead, including a standard vault toilet to be built to CSP specifications and maintained by CSP.

#### **5.4.6 Windy Corner Trailhead**

DOT&PF commits to the following measures to minimize harm on the Windy Corner Trailhead:

- DOT&PF would completely reconstruct the trailhead and expand parking capacity. DOT&PF would provide a pedestrian/bike and emergency vehicle underpass of the highway and a spur trail to connect the Windy Corner Trailhead (a Section 4(f) property) with the Windy Corner Scenic Overlook (not a Section 4(f) property). A gated, at-grade crossing of the railroad would provide an emergency boat launch ramp for water rescue in CSP and other Turnagain Arm waters.
- DOT&PF has consulted with ADF&G, and the Proposed Action avoids the majority of the mineral licks within the area.

#### **5.4.7 Falls Creek Trailhead**

DOT&PF commits to the following measure to minimize harm on the Falls Creek Trailhead:

- DOT&PF would fully replace the function and parking capacity of the existing parking area and use any additional space created for additional parking capacity, with the consultation of CSP.

#### **5.4.8 Indianhouse Mountain Trailhead and Trail**

DOT&PF commits to the following measures to minimize harm on the Indianhouse Mountain Trailhead and Trail:

- DOT&PF would include a small pullout trailhead of approximately the same capacity and configuration as the existing one at the Indianhouse Mountain Trailhead.
- DOT&PF would reconstruct the start of the trail to ensure the continuing trail was reasonably accessible to hikers and rebuild a portion of the trail west of the trailhead on a new alignment, because the cut for the expanded highway would impact a short trail segment.

#### **5.4.9 Indian Creek Trailhead**

DOT&PF commits to the following measures to minimize harm on the Indian Creek Trailhead:

- DOT&PF would establish new parking for the Indian Creek Trailhead along the rerouted Indian to Girdwood Bike Path north of the highway (mountain side). It would have the same or greater parking capacity and include a vault toilet, unless located adjacent to the new ballfield/park addressed below.
- DOT&PF would establish a new ballfield immediately southeast of the existing Boulder Ballfield with adjacent right-in, right-out access and parking as well as a latrine in consultation with the community, CSP, and other stakeholders.

#### **5.4.10 Bird Creek Access Parking**

DOT&PF commits to the following measure to minimize harm on the Bird Creek Access parking area:

- DOT&PF would reconfigure parking and associated features within the lot to CSP specifications to accommodate changing the driveway from one end to the other.

#### **5.4.11 Bird Creek Observation Platforms and Trail Connections**

DOT&PF commits to the following measures to minimize harm on the Bird Creek Observation Platforms and Trail Connections:

- DOT&PF would reconstruct impacted trails and extend a trail east of Bird Creek to connect with the frontage road, providing ADA access.
- DOT&PF would reconstruct the viewing/ADA fishing platforms that would be impacted by the Project.
- DOT&PF would design an underpass of the Bird Creek highway bridges, in consultation with CSP, that would function at least as well as the existing underpass.

#### **5.4.12 Bird Creek Overflow Parking and Bird Creek Overflow Campground**

DOT&PF commits to the following measures to minimize harm on the Bird Creek Overflow Parking and Bird Creek Overflow Campground:

- DOT&PF would maintain the existing disabled parking in the DOT&PF ROW at the driveway of the Bird Creek Overflow Campground.
- DOT&PF would support improved facilities in the Bird Creek Campground (see Section 5.4.14).

#### **5.4.13 Bird Creek Campground and Bird Creek Trailhead**

DOT&PF commits to the following measures to minimize harm on the Bird Creek Campground and Bird Creek Trailhead:

- DOT&PF would work with CSP to run electrical connections to the camping sites from the existing service at the campground.
- DOT&PF would work with CSP to pave the campground roads and camp site pads.

#### **5.4.14 Rock Climbing Areas**

DOT&PF commits to the following measures to minimize harm on the Rock Climbing Areas:

- The Proposed Action would include a highway alignment shift seaward in the Sunshine Ridge/Northwest Passage area because climbing organizations noted this area as important for preservation.
- DOT&PF would work with CSP to provide adequate access to Crack in the Woods and Pivot Point rock climbing areas, if needed.

#### **5.4.15 Turnagain Arm Trail**

DOT&PF commits to the following measure to minimize harm on the Turnagain Arm Trail:

- Where the trail would be eliminated by rock cuts, or within areas where the rock cut would come close to the trail, DOT&PF would reroute the trail farther uphill to a similar trail standard, in coordination with CSP. DOT&PF would follow CSP design criteria, work with the existing topography to create a pleasant trail experience and minimize the width of areas where trees are cleared for new trail segments to maintain a similar look and feel on the trail.

#### **5.4.16 Indian to Girdwood Bike Path**

DOT&PF commits to the following measures to minimize harm on the Indian to Girdwood Bike Path:

- DOT&PF would ensure continuity of the existing Indian to Girdwood Bike Path, reconstructing impacted trail segments.
- The Proposed Action would provide a 14-mile, separated, paved, multi-use pathway from Indian to Rabbit Creek Road. This new multi-use pathway would connect to the Indian to Girdwood Bike Path. It would be minimally separated from the paved highway shoulder by 10 feet, except in short sections where the pathway is along low-volume frontage roads in Bird and Indian as well as the shoulder of Potter Valley Road.
- DOT&PF would discuss with CSP the potential to re-establish or relocate the community parking area for the Indian to Girdwood Bike Path (currently near Konikson Road) to avoid conflicts with adjacent landowners.

### **5.5 Measures to Minimize Harm: Historic Sites**

The Project's Section 106 process has resulted in a finding that the Project would have no adverse effects on historic properties within the Project area, and there is no physical use of those properties; therefore, no mitigation measures are necessary for historic sites.

## 6 Coordination

EA Section 6 Comments and Coordination and Appendix V *Stakeholder Engagement (Public and Agency Coordination)* address the Project's public and agency coordination and consultations in detail. Many of the general issues and concerns within the Project area, such as changes to scenic views, trail impacts, wildlife and wildlife habitat, and public recreation, are Section 4(f)-related impacts; therefore, much of the public and agency coordination addressed in the EA is relevant to Section 4(f). The following summarizes key points, emphasizing those efforts specific to Section 4(f) properties.

### 6.1 Coordination: General Public

Coordination for this Project began in January 2023 with the publication of the Notice of Intent to complete an EA under the National Environmental Policy Act and a Section 4(f) Evaluation under the USDOT Act. Public and agency meetings began during spring/summer 2023. Coordination activities targeted residents and property owners near Potter Marsh, Rainbow, Indian, and Bird as well as the broader public in Anchorage and the Turnagain Arm communities of Rainbow, Indian, Bird, and Girdwood. Public meetings in April 2023 introduced the Project and conducted Project scoping, and meetings in December 2023 discussed purpose and need development, Project progress, and design concepts. Each round of meetings occurred at multiple locations and dates, with a month-long online open house presentation hosted on the Project's website. Public outreach efforts also included multiple "listening post" meetings, direct presentations to area community councils and planning committees, and monthly Stakeholder Working Group (SWG) meetings to discuss the Project with land managers; resource agencies; and community organizations such as Rabbit Creek and Turnagain Arm Community Councils, Girdwood Board of Supervisors, Bike Anchorage, Alaska Trucking Association, Alaska Travel Industry Association, and Anchorage Metropolitan Area Transportation Solutions (the local-state Anchorage transportation planning group).

Some members of the public and organizations have been highly interested in potential impacts on wetlands, fish, bird and wildlife habitat, camping, rock climbing, hiking and biking trails, and other park and recreation issues. These are typically related to Section 4(f) properties, including the ACWR and CSP.

The public process will continue with the public notice and formal comment period and public hearing process on the EA and this Draft Section 4(f) Evaluation.

### 6.2 Coordination: Officials with Jurisdiction

Consultation with OWJs began in 2023 during the scoping process, when DOT&PF met with ADNR-DPOR and ADF&G regarding adjacent CSP and ACWR lands and resources, and sent letters soliciting information to better understand area issues. A SWG was established and met 11 times between August 2023 and November 2024. The SWG included the Section 4(f) land managing agencies: ADNR-DPOR, ADF&G, MOA, and SHPO. Meeting topics addressed ACWR and CSP lands, recreation activities and areas, and cultural resource issues, often without specifying Section 4(f). EA Appendix V *Stakeholder Engagement (Public and Agency Coordination)* includes a summary of agency issues raised during stakeholder engagement,

including SWG comments. Appendix Q Section 106 Consultation/Findings provides a record of consultation regarding cultural resources.

Meetings specifically focused on Section 4(f) refuge and park lands and issues occurred during 2023, 2024, and 2025. Some meetings were one-on-one with a particular agency, and some occurred with multiple agencies. Table 6-1 summarizes these meetings.

**Table 6-1. Agency Section 4(f) meetings**

Date	Purpose	Organization
6/21/2023	Update on project design, learn ADNR-DPOR plans for CSP	ADNR-DPOR
9/8/2023	Update on Project design, discuss management of ACWR	ADF&G
6/13/2024	Consultation regarding Section 4(f) properties and significance	ADNR-DPOR
8/22/2024	Consultation regarding Section 4(f) properties and significance	ADF&G
8/26/2024	Consultation regarding Section 4(f) properties and significance	ADNR-DPOR
4/10/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR
4/24/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR
5/1/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADF&G, ADNR-DMLW
5/22/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADF&G, ADNR-DMLW
6/4/2025	Consultation regarding Section 4(f) property impacts and mitigation	MOA HLB
7/11/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR and SHPO
7/25/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR and SHPO
8/8/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR and SHPO
8/25/2025	Consultation regarding Section 4(f) property impacts and mitigation	ADNR-DPOR and SHPO

Note: HLB = Heritage Land Bank

Coordination at these meetings focused on the identification of Section 4(f) resources associated with ACWR and CSP activities and features that are within and adjacent to the existing DOT&PF ROW, Proposed Action impacts, and potential mitigation for those impacts.

Section 106 consultation included eleven meetings of Section 106 consulting parties between October 2023 and August 2025. Attendees included SHPO, BLM, Kenaitze Indian Tribe, Native Village of Eklutna, Chugach Alaska Corporation, Kenai Mountains – Turnagain Arm National Heritage Area, Knik Tribe, Chickaloon Village Traditional Council, Prince William Sound Economic Development District, MOA, ARRC, U.S. Fish and Wildlife Service, Forest Service, Alaska Association for Historic Preservation, and Iditarod Historic Trail Alliance. SHPO is an OWJ over historic properties within the corridor that were evaluated for Section 4(f) protection. The Section 106 consultation process was completed on October 23, 2025, resulting in a finding of No Adverse Effect on Historic Properties (refer to EA Section 3.3.5 Archaeological and Historical Resources and Appendix Q Section 106 Consultation/Findings).

Another consultation process under this Project addresses CSP lands encumbered by use of multiple LWCF grants to develop and improve areas within the park. As such, CSP is protected for public outdoor recreation, per the federal LWCF Act of 1965. Any permanent use of land for purposes other than public outdoor recreation (e.g., highway purposes) would constitute a conversion, which would need to be formally processed between CSP and the National Park Service (NPS). Consultations among DOT&PF, ADNR, CSP, and NPS are ongoing. More information about this process is detailed in the EA’s Section 3.3.13 Section 6(f) of the Land and Water Conservation Act and Appendix T Section 6(f) Evaluation, which will be included in the Final EA.

## 7 Conclusions

This Draft Section 4(f) Evaluation presents the basis for future decision making by DOT&PF. Per 23 CFR 774.5(a), DOT&PF is releasing it to the OWJs (including ADNR-DMLW and ADF&G for ACWR; ADNR-DPOR for CSP; and SHPO for the Turnagain Arm District, Alaska Railroad and other historic properties) and Department of the Interior, as required to solicit their comments, and to other agencies and the public. DOT&PF expects to revise this document based on comments received, then make its final findings. The Final Section 4(f) Evaluation may present DOT&PF's basis for concluding that there is no feasible and prudent alternative to using Section 4(f) properties, and all possible planning to minimize harm to Section 4(f) properties has been incorporated.

The Proposed Action would include use of:

- Anchorage Coastal Wildlife Refuge (ACWR), including unvegetated mudflats, Lots 178 and 205 and the Ggeh Betnu Trail, and ACWR features that occur within the DOT&PF ROW
- Chugach State Park (CSP), including CSP features that occur within MOA park lands (Bird Creek Regional Park, managed as part of CSP) and DOT&PF ROW
- Turnagain Arm District, Alaska Railroad (ANC-04057/SEW-01613; NRHP Eligible, Criterion A). The exception to the requirements for Section 4(f) approval at 23 CFR 774.13(f)(2) applies to this historic property.

## 8 References

ADF&G (Alaska Department of Fish and Game)

- 1991 *Anchorage Coastal Wildlife Refuge Management Plan*. ADF&G, Divisions of Habitat and Wildlife Conservation. February 1991.

ADNR-DPOR (Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation)

- 2016 *Chugach State Park Management Plan*. Adopted February 2016. Accessed November 2, 2024, at <https://dnr.alaska.gov/parks/plans/chugach/chugachmplan.htm>.

BLM (Bureau of Land Management)

- 1986 *Iditarod National Historic Trail Seward to Nome: A Comprehensive Management Plan*. Bureau of Land Management, Anchorage District Office. March 1986. Accessed at [https://www.arlis.org/docs/vol2/Iditarod/INHT\\_Comprehensive\\_Management\\_Plan/INHT\\_Comprehensive\\_Management\\_Plan.pdf](https://www.arlis.org/docs/vol2/Iditarod/INHT_Comprehensive_Management_Plan/INHT_Comprehensive_Management_Plan.pdf).
- 2025 *Alaska Long National Scenic Trail Feasibility Study*. Bureau of Land Management, Anchorage District Office. Accessed at <https://eplanning.blm.gov/eplanning-ui/project/2030342/510>.

FHWA (Federal Highway Administration)

- 2012 *Section 4(f) Policy Paper*. July 12, 2012. Accessed March 3, 2025, at <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>.

HDR, Inc.

- 2024 Notes of a meeting between DOT&PF and ADF&G, regarding Anchorage Coastal Wildlife Refuge. Notes on file with DOT&PF.

Hosken, Kaitlyn, Robyn Miller, and Chris Keil

- 2024 *Safer Seward Highway Project, Seward Highway MP 98.5-118: Bird Flats to Rabbit Creek, Cultural Resources Survey Report: 2023 Fieldwork*. April 2024. Prepared by HDR for DOT&PF, Anchorage, Alaska.

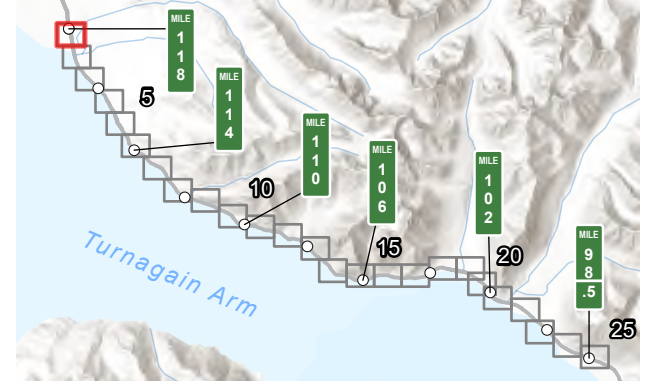
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## **Appendix A. Mapbook**

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- ▭ MOA Park
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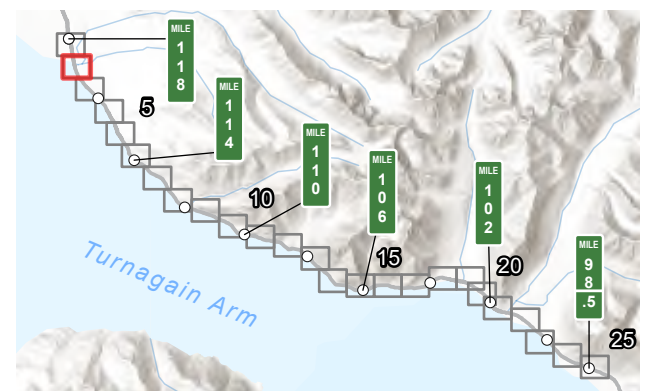


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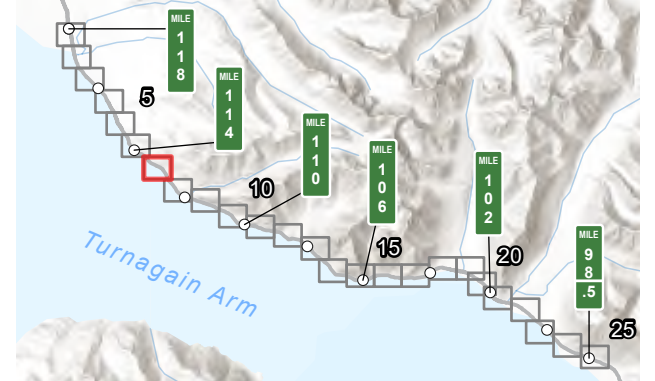
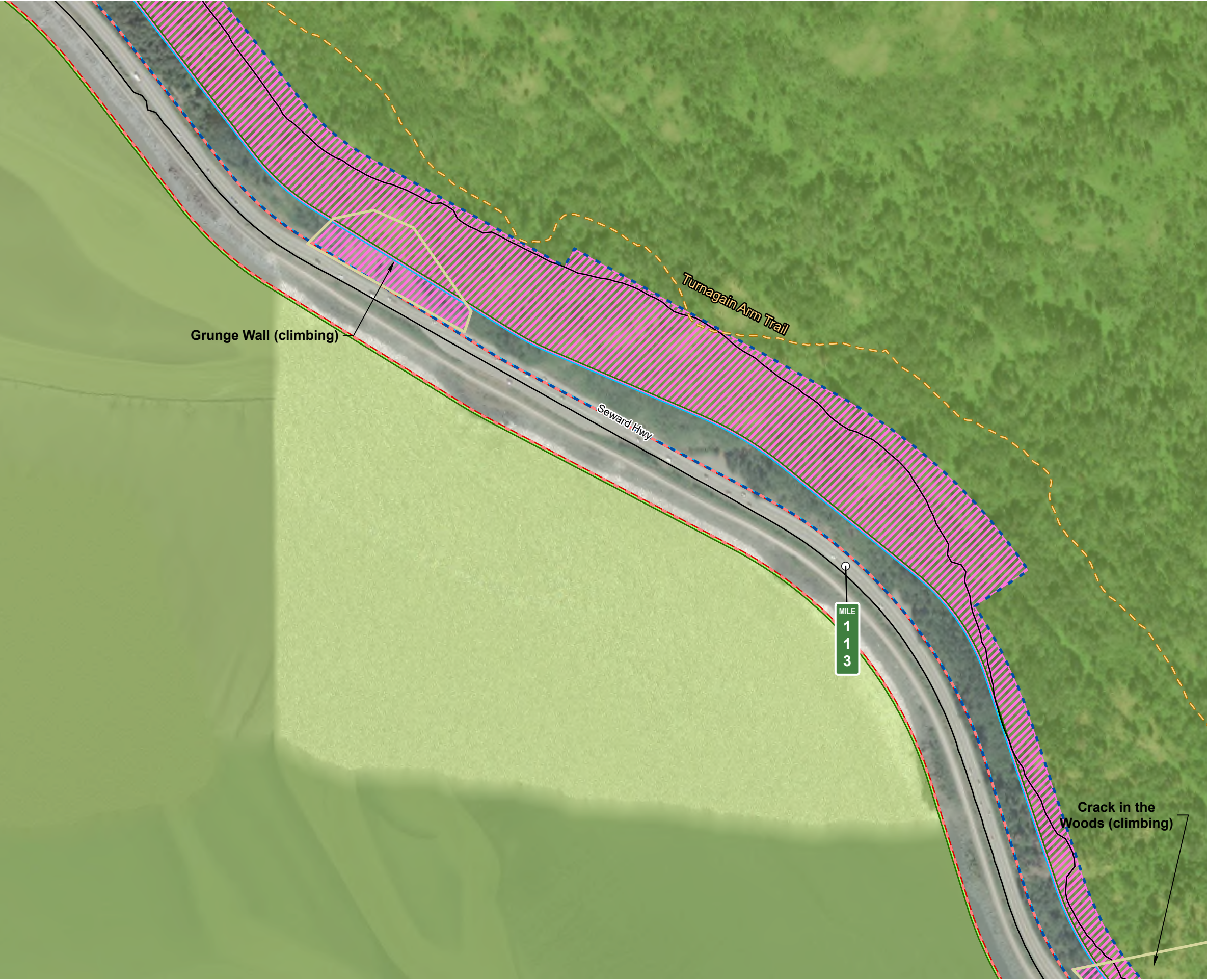
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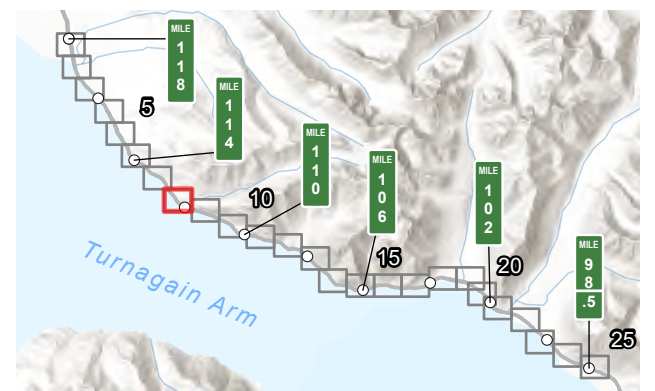
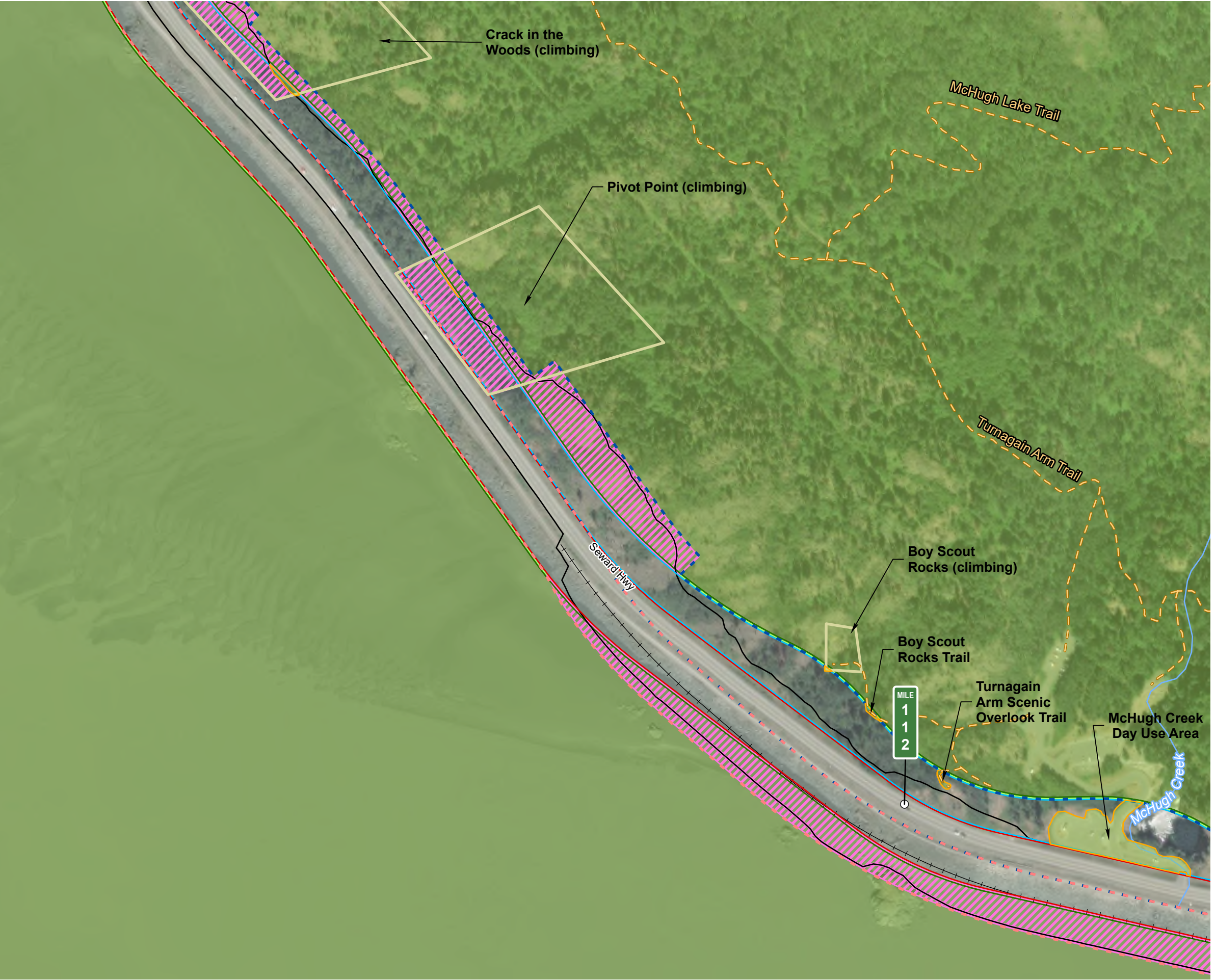
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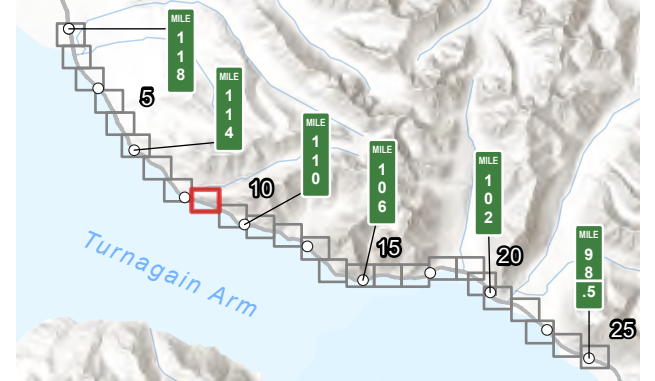
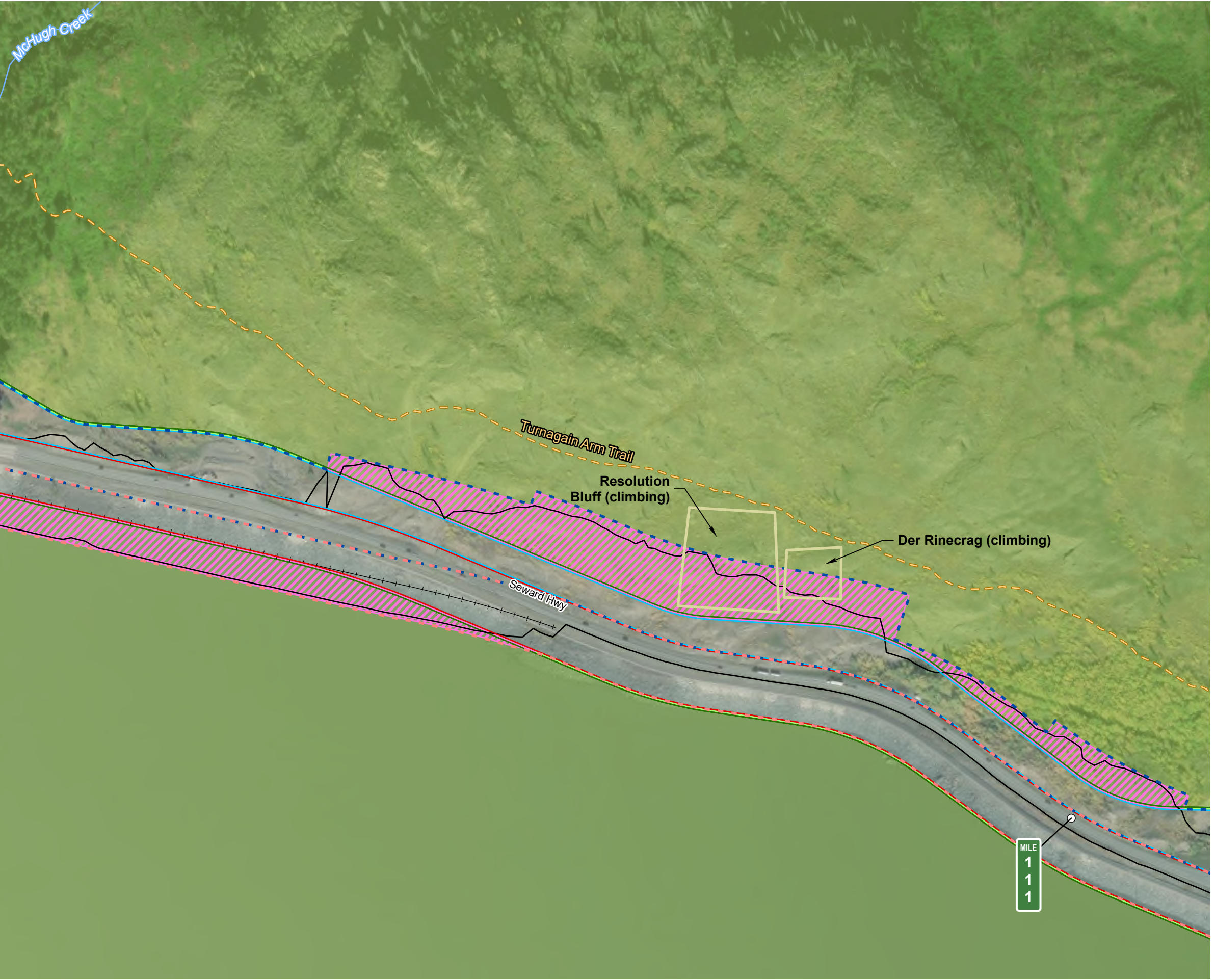
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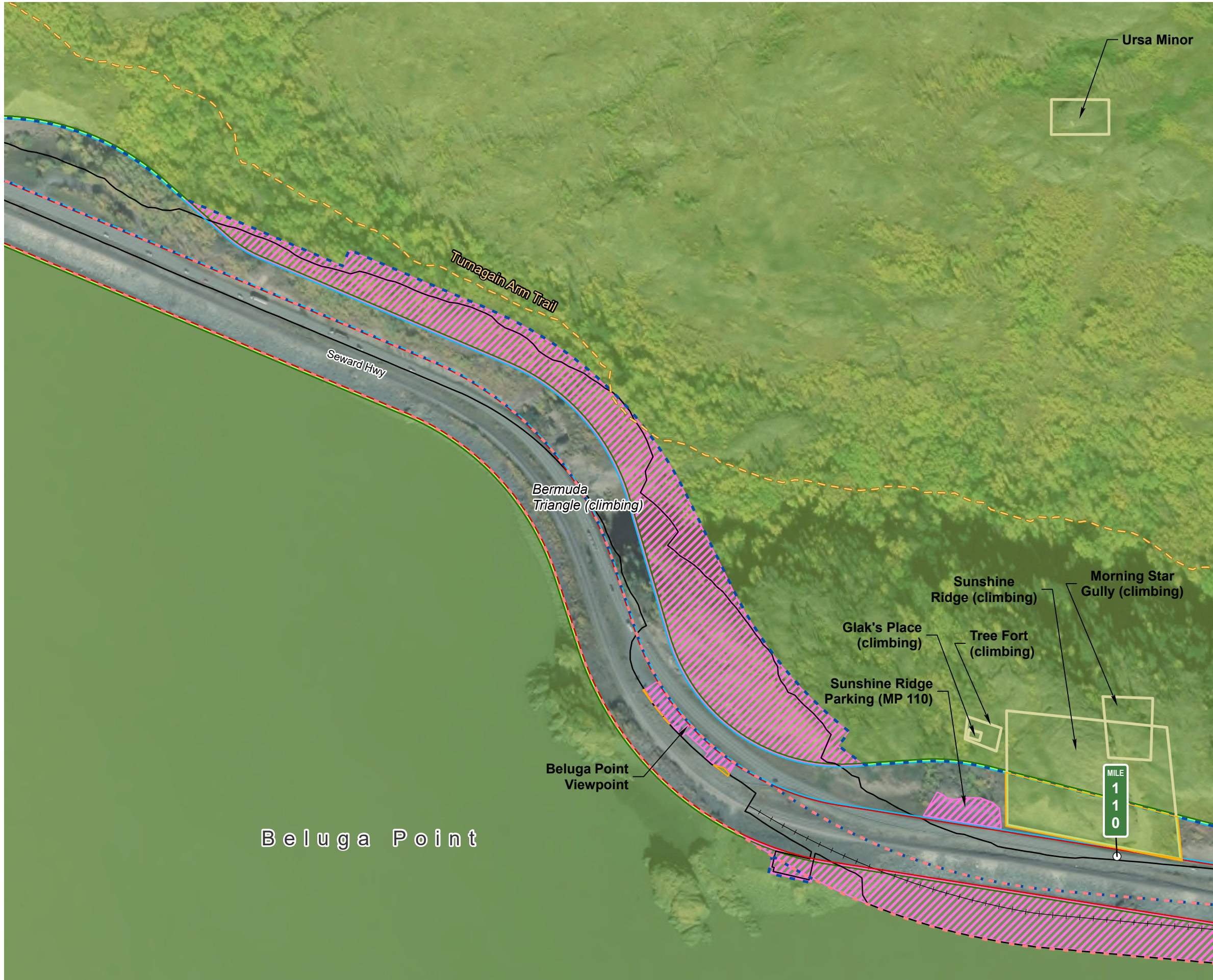
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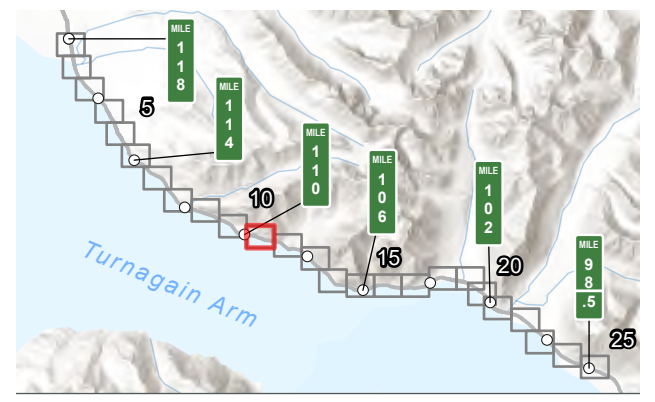
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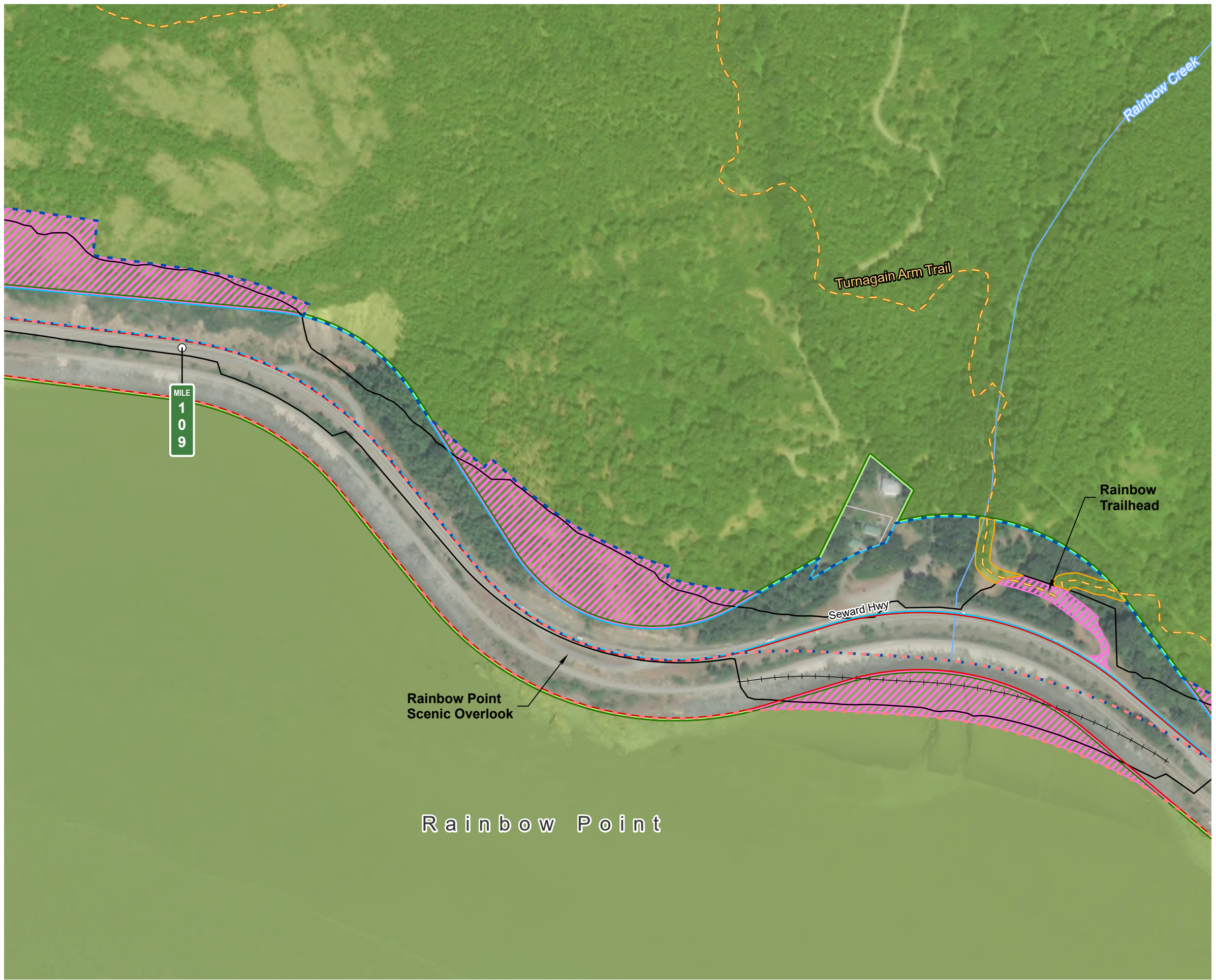
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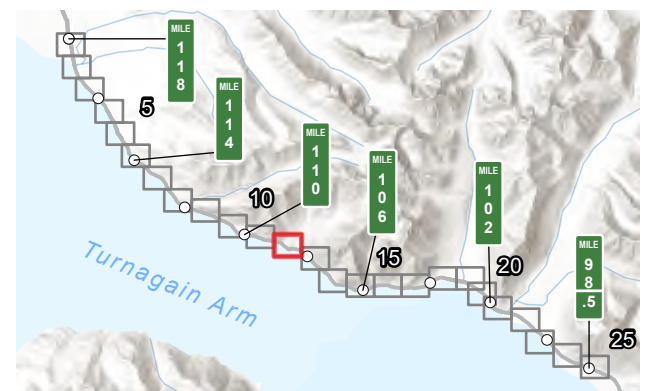
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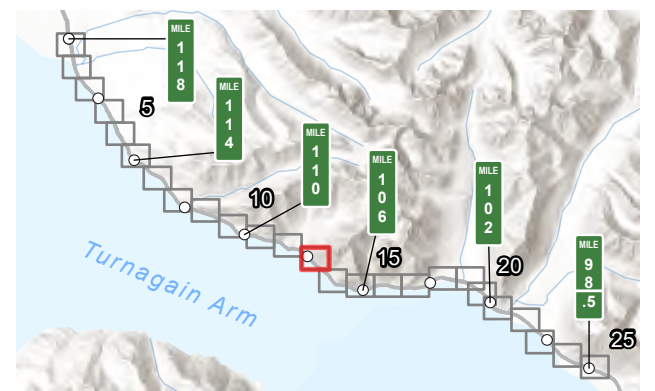
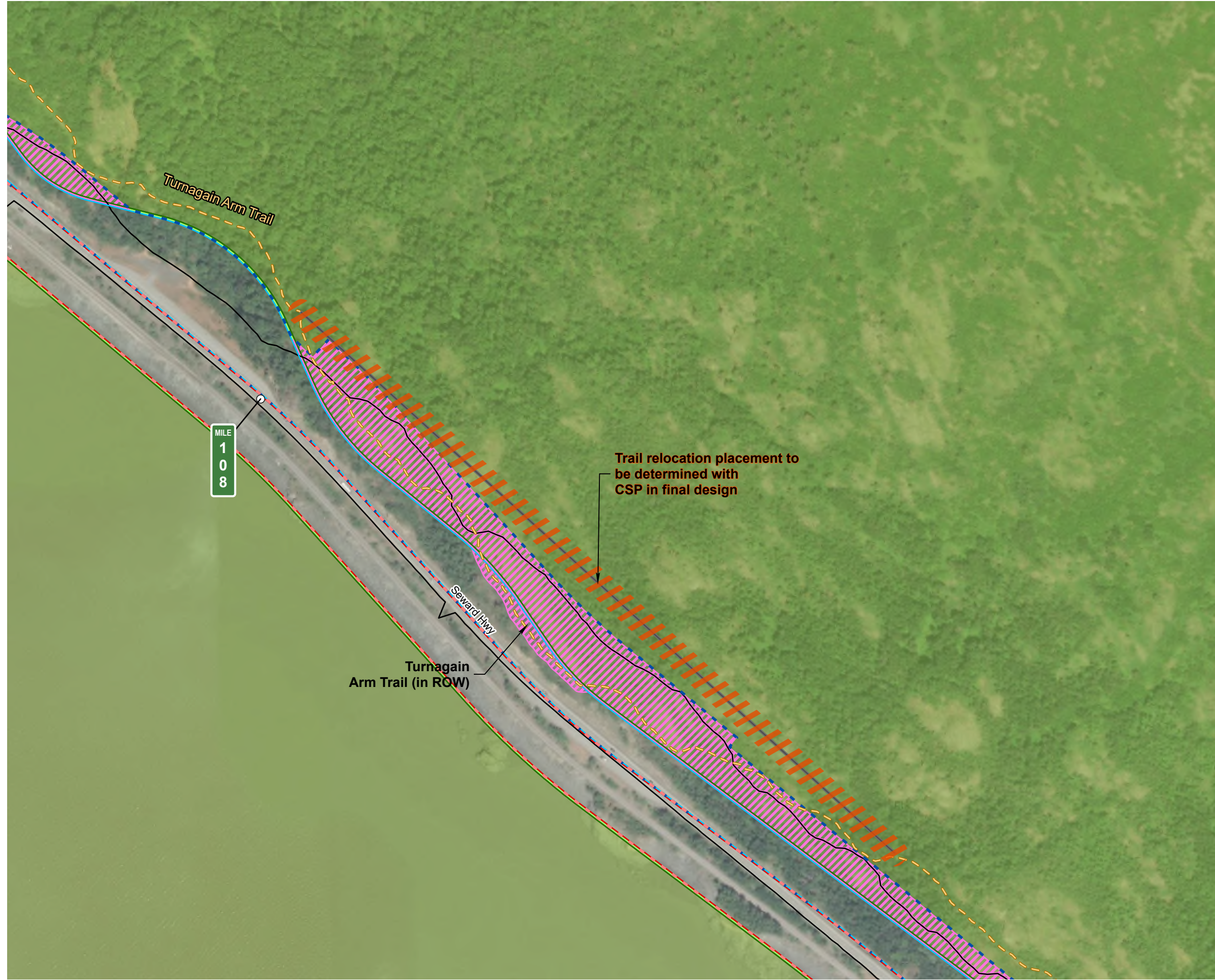


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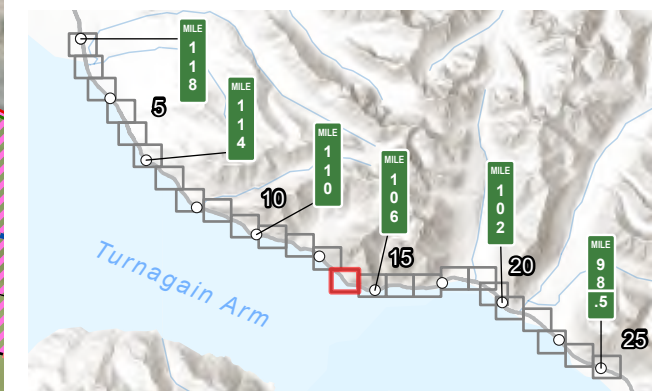
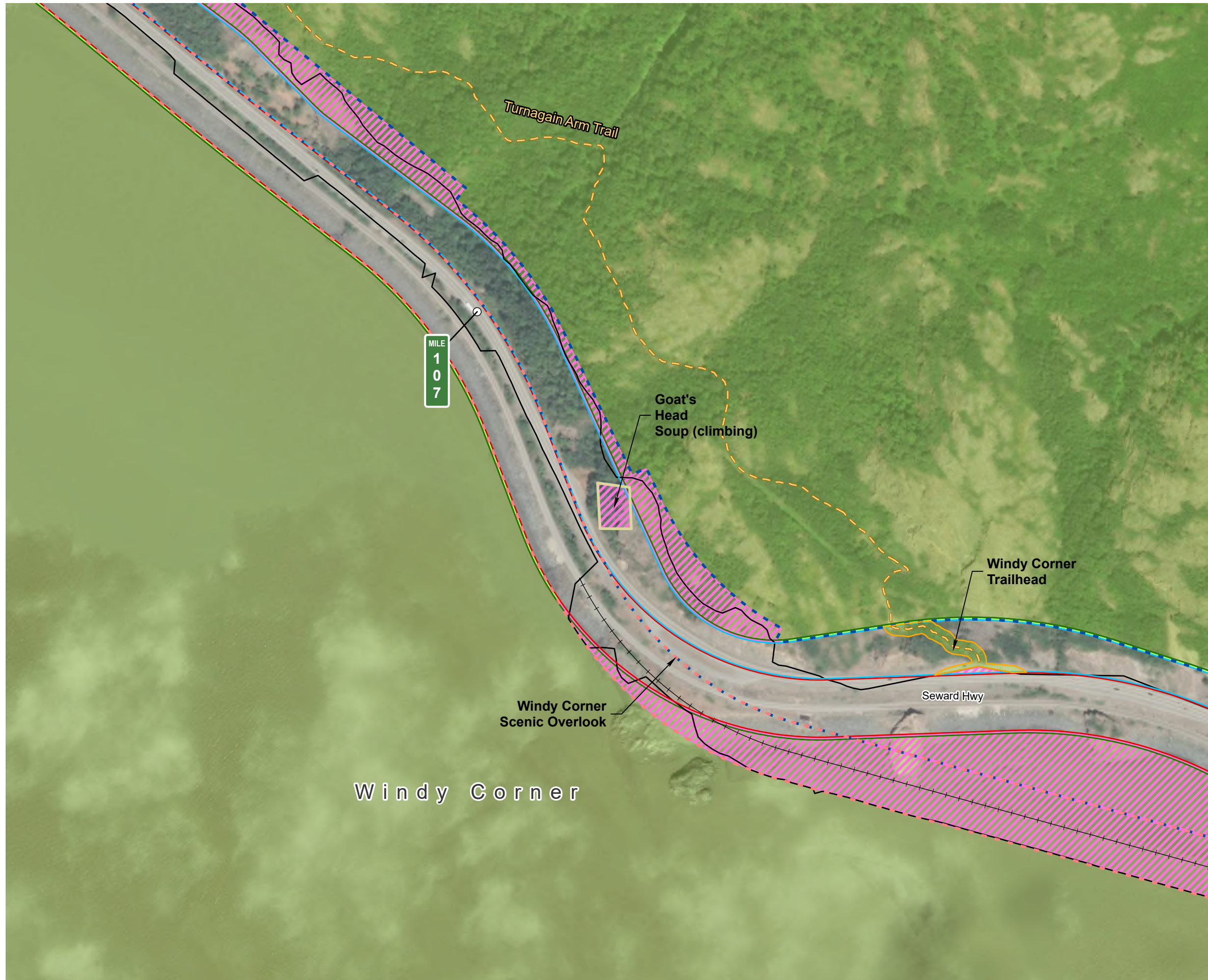
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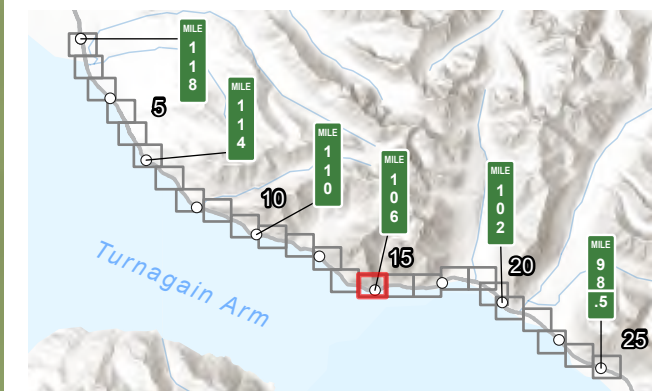
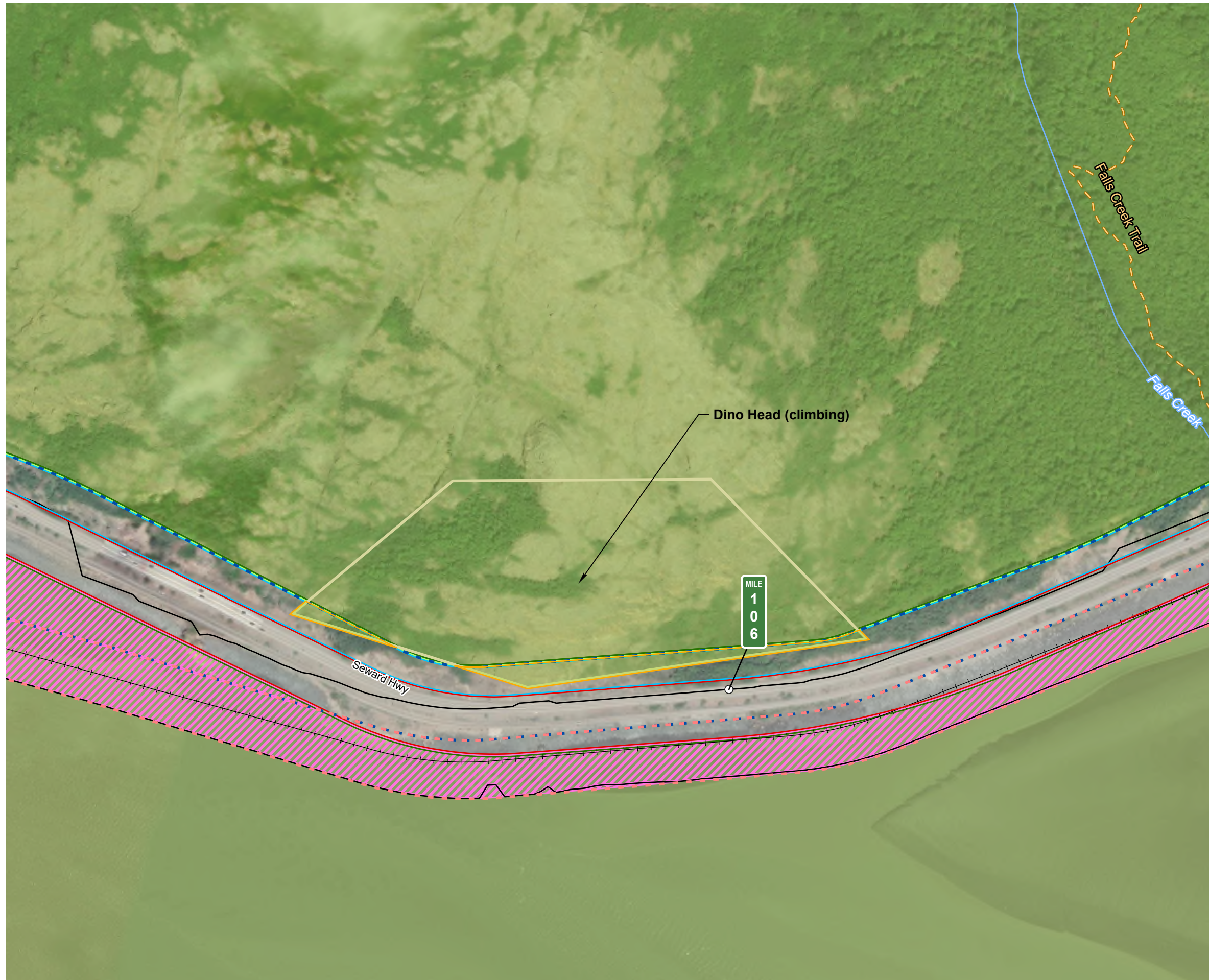


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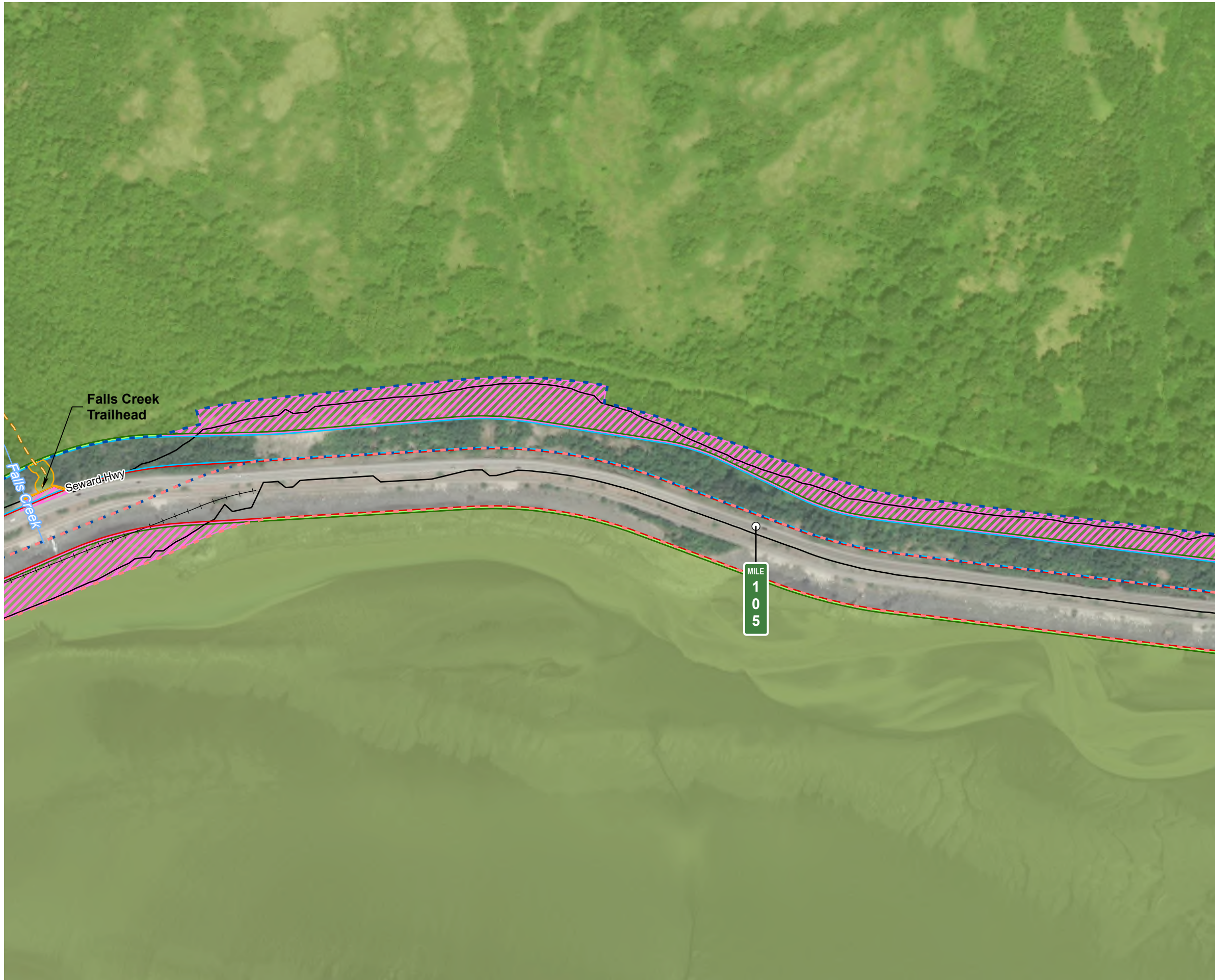
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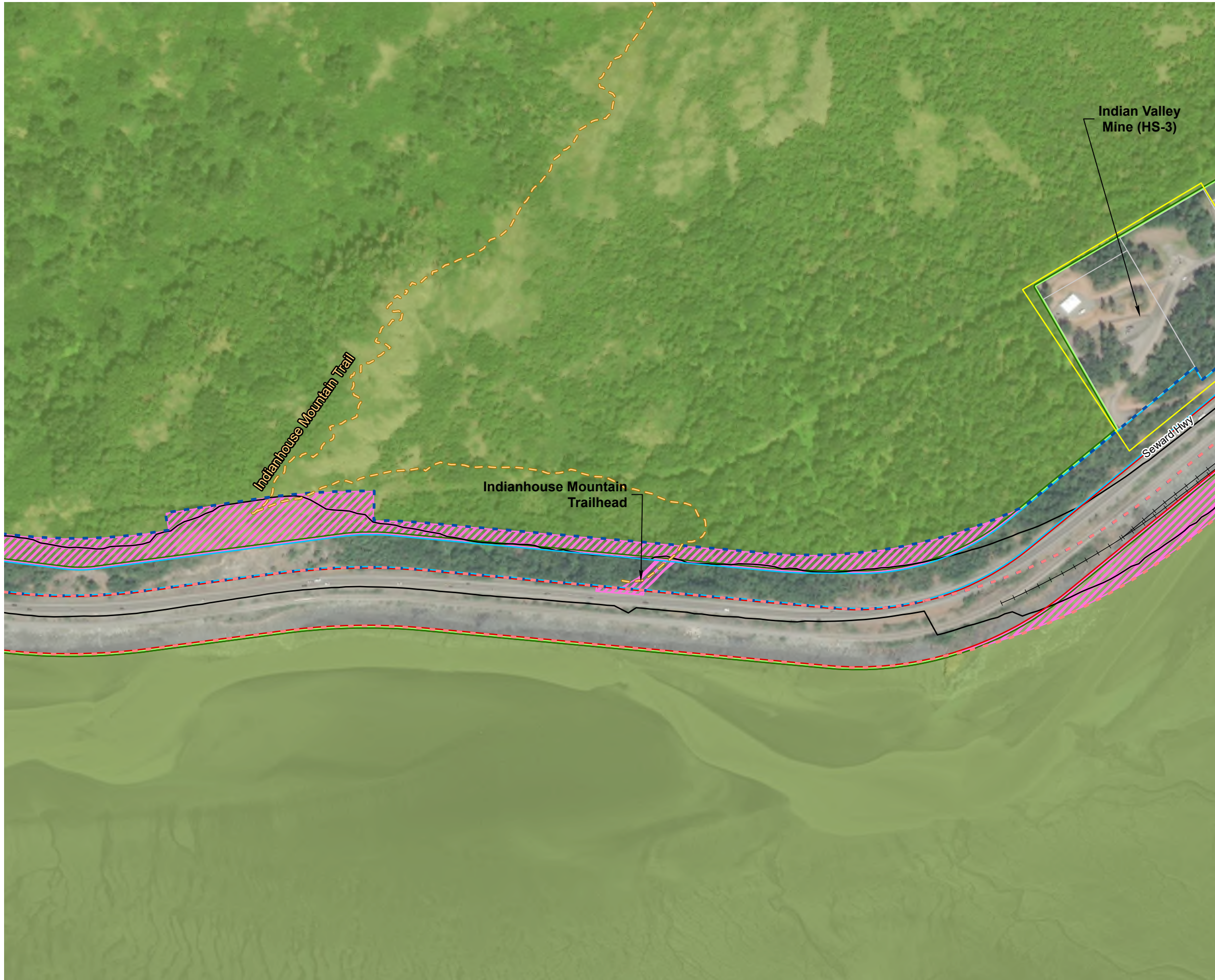
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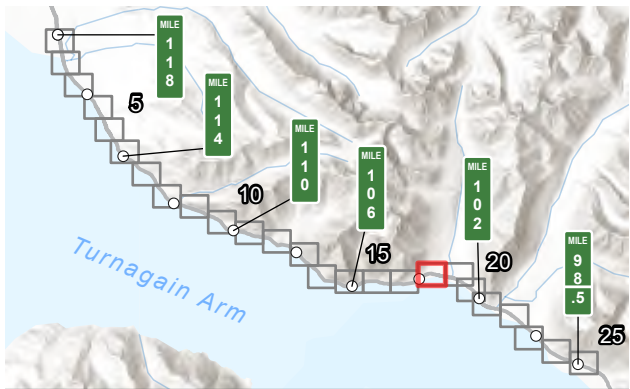


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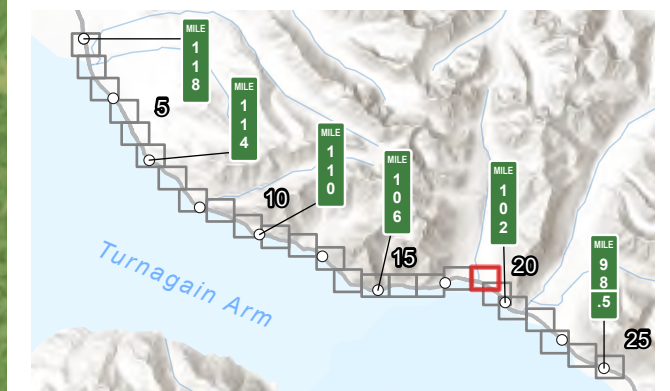


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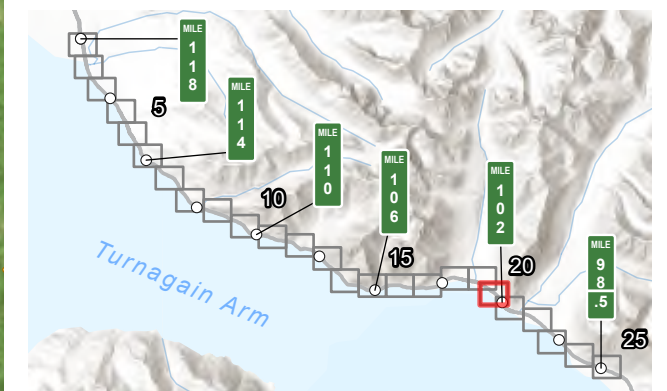
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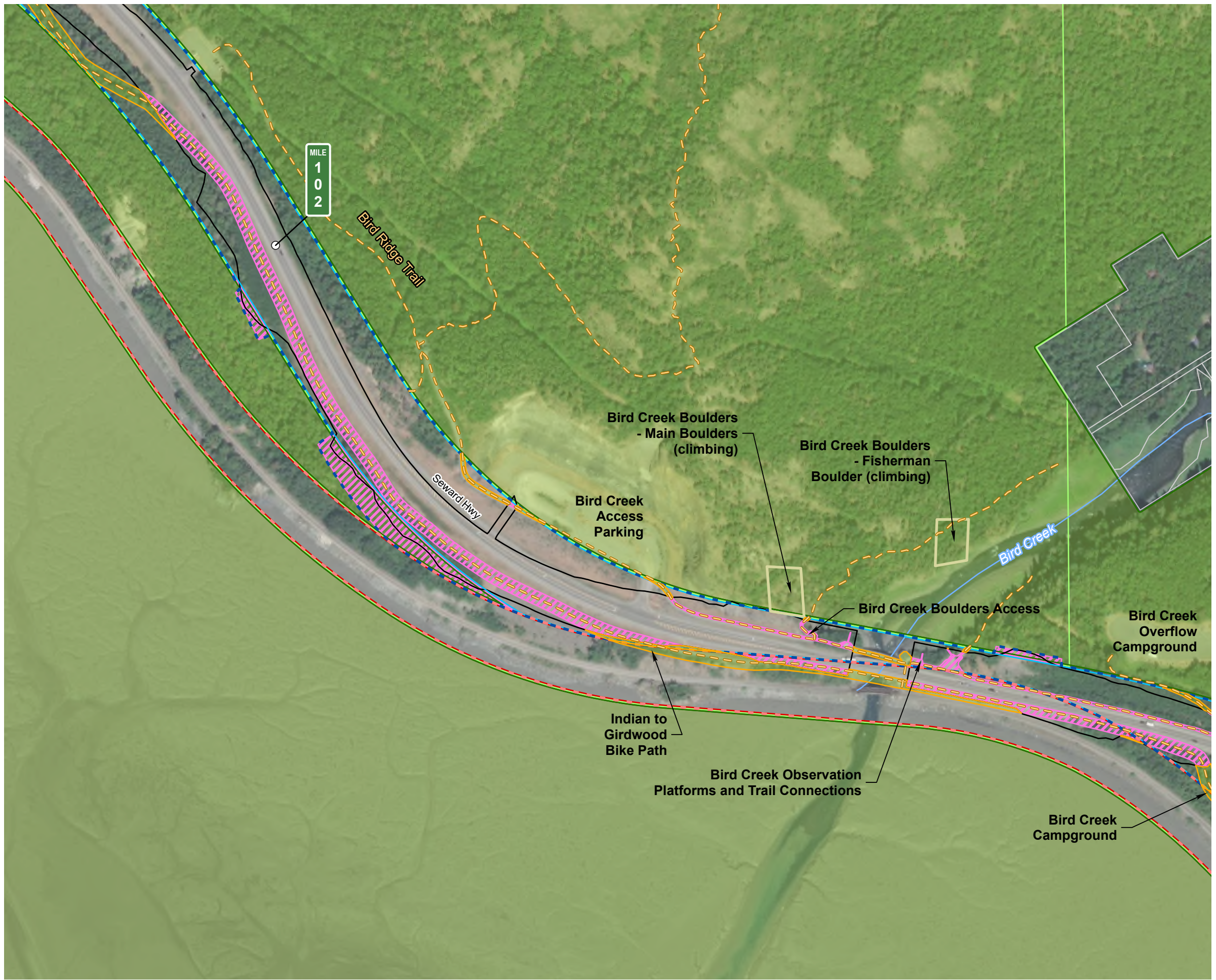
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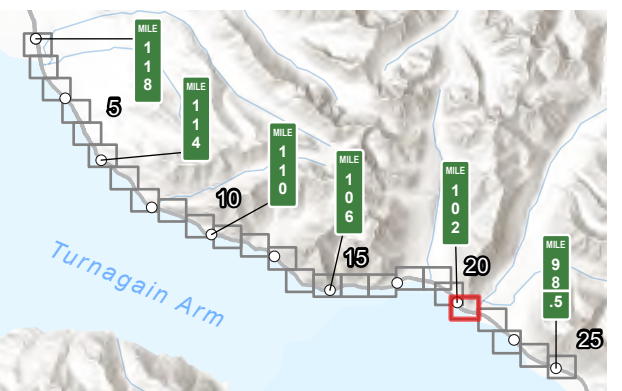


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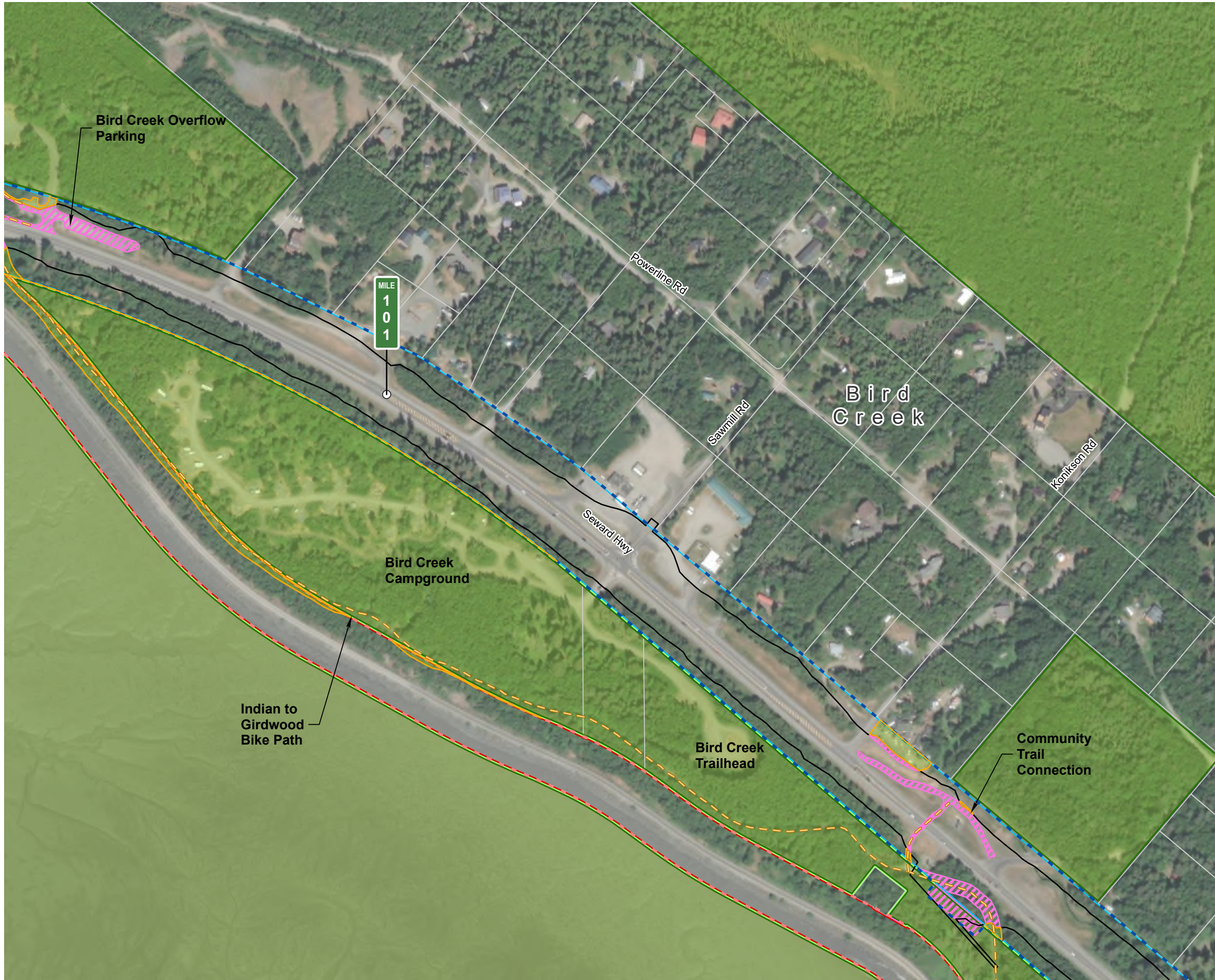




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- Alaska Railroad ROW
- - - Future DOT&PF Seward Highway ROW
- - - Future ARRC ROW
- ▭ Proposed Action Footprint
- ▭ 4(f)-Applicable Rock Climbing Area (Approximate)
- Chugach State Park Legislative Boundary
- ▭ Managed by Chugach State Park
- ▨ Impact to 4(f) Property
- ▭ Section 4(f) Property Associated with CSP
- ▭ MOA Parcel
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- ~ Stream



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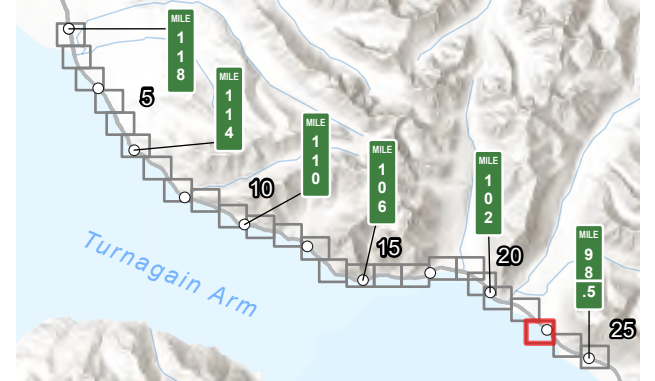
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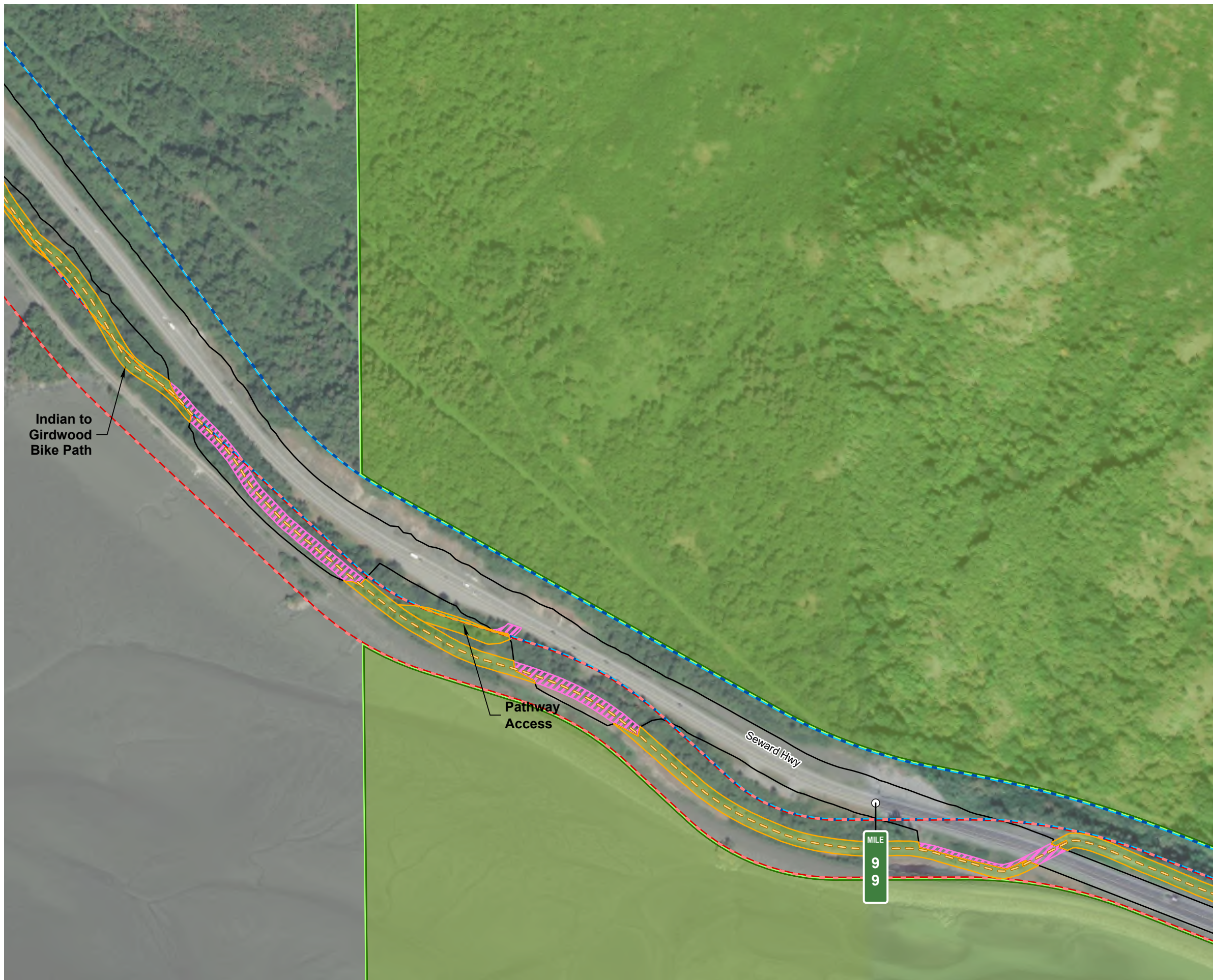
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Seward Highway MP 98.5-118  
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- Mileposts
- DOT&PF Seward Highway ROW
- Alaska Railroad ROW
- - - Future DOT&PF Seward Highway ROW
- - - Future ARRC ROW
- ▭ Proposed Action Footprint
- Chugach State Park Legislative Boundary
- ▭ Managed by Chugach State Park
- ▨ Impact to 4(f) Property
- ▭ Section 4(f) Property Associated with CSP
- ▭ MOA Parcel
- - - Trail or Pathway

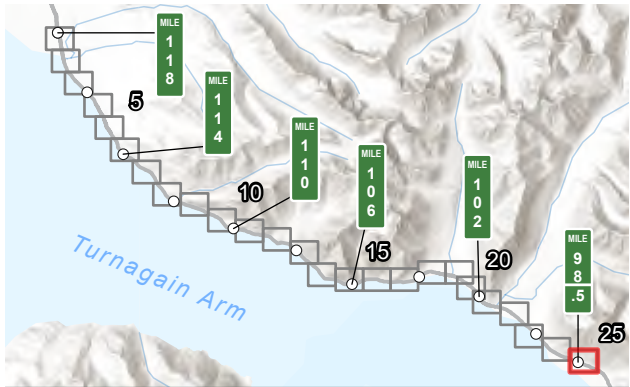


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Seward Highway MP 98.5-118  
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- Mileposts
- DOT&PF Seward Highway ROW
- Alaska Railroad ROW
- - - Future DOT&PF Seward Highway ROW
- - - Future ARRC ROW
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- Chugach State Park Legislative Boundary
- ▭ Managed by Chugach State Park
- ▭ Section 4(f) Property Associated with CSP
- - - Trail or Pathway



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## **Appendix B. Safer Seward Highway Project** ***Section 4(f) Property Identification***

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Safer Seward Highway Project  
Seward Highway MP 98.5 to 118,  
Bird Flats to Rabbit Creek  
Project No.: Z566310000/0A31034

# Section 4(f) Property Identification

DRAFT

December 2025

Prepared for:

*Alaska Department of Transportation and Public Facilities*

Prepared by:

HDR, Inc.

582 E. 36th Avenue, Suite 500

Anchorage, AK 99503-4169

907-644-2000 Phone | 907-644-2022 Fax

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## Acronyms and Abbreviations

ACWR	Anchorage Coastal Wildlife Refuge
ADF&G	Alaska Department of Fish and Game
ADL	Alaska Division of Land
ADNR	Alaska Department of Natural Resources
AHRS	Alaska Heritage Resource Survey
APE	Area of Potential Effects
ARRC	Alaska Railroad Corporation
AS	Alaska Statute
ATV	all-terrain vehicle
CFR	Code of Federal Regulations
CSP	Chugach State Park
CSPMP	<i>Chugach State Park Management Plan</i>
DMLW	Division of Mining, Land, and Water
DOI	U.S. Department of the Interior
DOT&PF	Alaska Department of Transportation and Public Facilities
DPOR	Alaska Division of Parks and Outdoor Recreation
FHWA	Federal Highway Administration
ID	identification number/identifier
INHT	Iditarod National Historic Trail
LT	Lot
M	mountain side
MOA	Municipality of Anchorage
MOU	Memorandum of Understanding
MP	Milepost
N	north
NRHP	National Register of Historic Places
OWJ	Official(s) with Jurisdiction
Project	Safer Seward Highway Project (Seward Highway MPs 98.5 to 118, Bird Flats to Rabbit Creek)
R	Range
ROW	right-of-way
RS	Revised Statute
RV	recreational vehicle
SEC	Section
Section 4(f)	Section 4(f) of the U.S. Department of Transportation Act
T	Township
TCP	temporary construction permit
U.S.C.	U.S. Code
W	west
W	water side

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# 1 Introduction

This document supports the *Individual Section 4(f) Evaluation* for the Safer Seward Highway Project (Project). This document identifies and evaluates the potential Section 4(f) of the U.S. Department of Transportation Act (Section 4(f)) properties within the Project corridor and makes a determination about which are subject to Section 4(f) protection. This document provides background information the Alaska Department of Transportation and Public Facilities (DOT&PF) is using to identify where Section 4(f) applies for the Project.

The environmental review, consultation, and other actions required by applicable federal environmental laws for this Project are being carried out by DOT&PF pursuant to 23 U.S. Code 327 and a Memorandum of Understanding (MOU) dated April 13, 2023, and executed by the Federal Highway Administration (FHWA) and DOT&PF.

Federal regulations at 23 Code of Federal Regulations (CFR) 774.17 define “Section 4(f) property” as follows:

Section 4(f) property means publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance.

Therefore, the primary criteria for a Section 4(f) park, recreation area, or refuge property within the Project corridor are:

- Is the property a park, recreation area, or wildlife or waterfowl refuge?
- Is the property public land?
- Is the property generally open to the public (wildlife refuges may not be fully open to the public to protect resources)?
- Is the property seen as significant to the Official(s) with Jurisdiction (OWJ), generally the land owner and/or manager?

Historic sites are protected under both Section 106 of the National Historic Preservation Act and Section 4(f), which takes cues from the Section 106 process. Neither Section 106 nor Section 4(f) require a historic site to be publicly owned or open to the public to be protected. Otherwise, the primary Section 4(f) criteria for historic sites include:

- Is the property a historic site?
- Has the property been found to be significant through the Section 106 process? Has the property been determined eligible for the National Register of Historic Places (NRHP)?

DOT&PF uses these primary criteria and the regulatory definition, along with associated federal Section 4(f) law, regulations, and guidance, and the *Alaska DOT&PF Environmental Procedures Manual* (DOT&PF 2024), to identify Section 4(f) properties.

The Anchorage Coastal Wildlife Refuge (ACWR) and Chugach State Park (CSP) are the primary properties within the Project corridor in terms of land area (see Figure 1-1), and Section 4(f) applies to these properties as a whole. Bird Creek Regional Park is park land

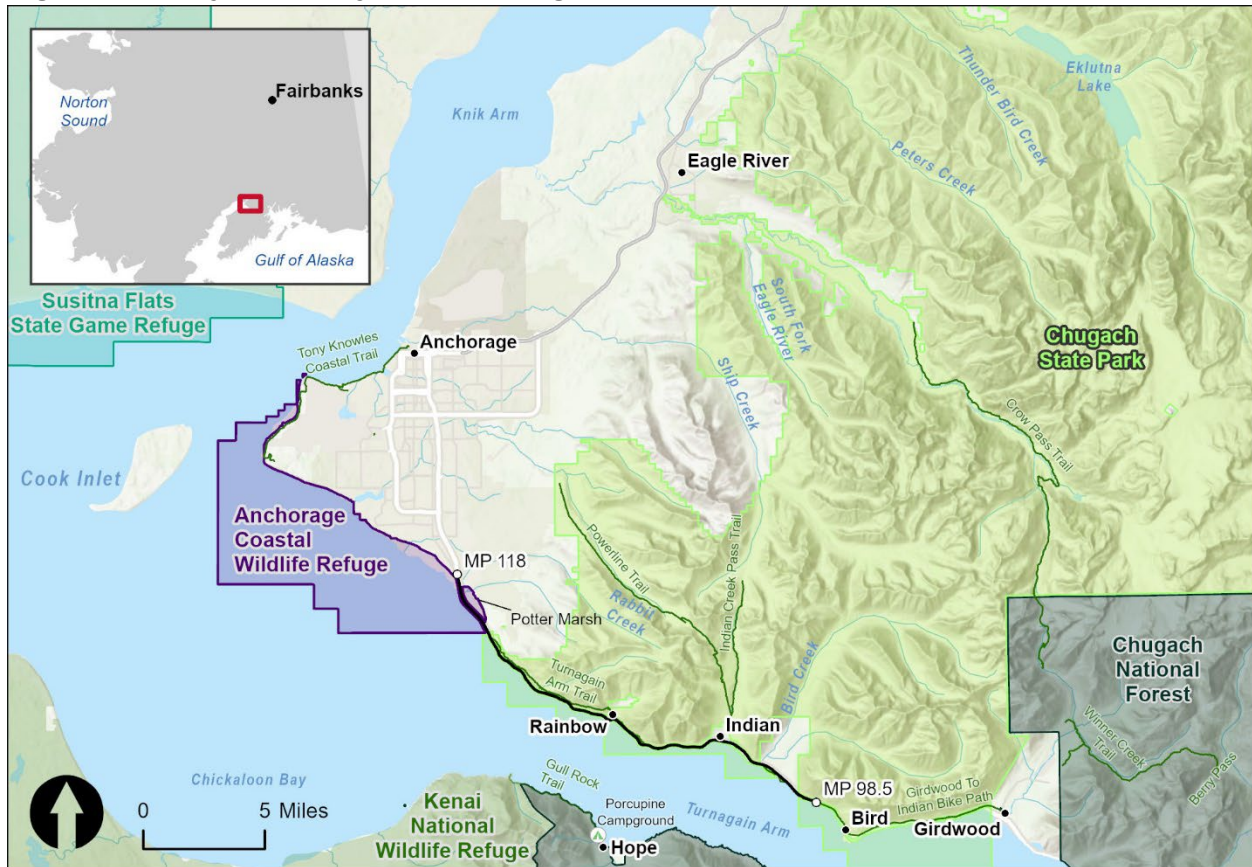
**Safer Seward Highway Project | Seward Highway MP 98.5 to 118,  
Bird Flats to Rabbit Creek**  
*Section 4(f) Property Identification*

owned by the Municipality of Anchorage (MOA) and managed by Alaska Department of Natural Resources (ADNR) as part of CSP. For the purposes of this Project, it is discussed as part of CSP (Section 3).

The more complex judgments regarding the applicability of Section 4(f) protections are associated with park and refuge features that occur within the Seward Highway or Alaska Railroad Corporation (ARRC) rights-of-way (ROWs). DOT&PF used the above criteria along with specific considerations to methodically address whether Section 4(f) protections extend to features that occur within the transportation ROW boundaries. These processes are outlined in Sections 2.2 (ACWR) and 3.2 (CSP).

Those properties identified herein as Section 4(f) properties will be subject to evaluation in the *Individual Section 4(f) Evaluation* for the Safer Seward Highway Project. Those properties for which DOT&PF determines Section 4(f) does not apply will not necessarily appear in that document.

**Figure 1-1. Project vicinity map showing area public lands.**



## 2 Anchorage Coastal Wildlife Refuge

### 2.1 Overview

**Location and Map Reference:** Seward Highway Mileposts (MPs) 115.3 to 117.6; Appendix A Mapbook, pages 1 and 2

**Size:** 32,476 acres (ADF&G 1991)

**Ownership/Management:** State of Alaska, Alaska Department of Fish and Game (ADF&G), Division of Wildlife Conservation and ADNR. The Division of Wildlife Conservation and ADNR manage the ACWR (ADF&G 1991), except lands within the boundary of ACWR that the MOA owns; the MOA lands are managed by MOA and ADF&G.

**Public Access:** The ACWR maps show 13 access points throughout the refuge. Within the Project area, primary access points are the Rabbit Creek Shooting Park (large parking lot), the North Potter Marsh Visitor Facility/Boardwalk (large parking lot), three ACWR Wildlife Viewing Pullouts along the eastern side of the Seward Highway bordering Potter Marsh, and South Potter Marsh Visitor Facility/Boardwalk (large parking lot).

**Section 4(f) Property Type:** Wildlife or Waterfowl Refuge

### 2.2 Activities, Features, and Attributes

The ACWR extends along Anchorage's coastline for 16 miles, from Point Woronzof (at the western end of Northern Lights Boulevard) to Potter Creek, but it is best known for the portion located within the Project area, and between the Old Seward and New Seward Highways, an area called Potter Marsh.

In 1988, the Alaska Legislature established the ACWR in Alaska Statute (AS) 16.20.031(a) to “protect waterfowl, shorebirds, salmon, and other fish and wildlife species and their habitat, and for the use and enjoyment of the people of the state” (ADF&G 1991). Any habitat-altering activity, including construction work, requires a Special Areas Permit from the ADF&G Habitat Section.

In general, ACWR attributes include extensive tidal wetlands and portions of forested uplands that function as habitat for a wide variety of migrant and resident birds, including, in most years, the only nesting sandhill cranes within the Anchorage area. It also provides habitat for terrestrial mammals, including Anchorage's extensive moose population, black bear population, and occasional brown bear. The ACWR's extent makes it an important movement corridor for these larger animals.

For humans, the ACWR provides for wildlife viewing and photography; hunting with bow and rifle; walking and hiking; limited boating; and winter activities such as skiing, winter/fat-tire biking, ice skating, and hiking/snowshoeing.

## 2.2.1 Potter Marsh and Seward Highway – Area Facilities

Several developed ACWR features adjacent to and within the Seward Highway ROW provide for recreation, education activities, and access. Table 2-1 summarizes these facilities, and numbering is reflected in Appendix A Mapbook, pages 1 and 2. The following subsections describe these facilities.

**Table 2-1. ACWR facilities within and near the Seward Highway right-of-way.**

Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Land Ownership	Section 4(f) Considerations	Section 4(f) Applicability
1	Ggeh Betnu Trail	117.7 (M)	Trail	State of Alaska, MOA, DOT&PF ROW with agreement for use of the ROW	Constructed to connect the community to the ACWR (Potter Marsh); important feature to OWJ	Yes
2	Lots 178 and 205	117.7 (M)	Parcel	State of Alaska, ADF&G, with deed restrictions; referred to as “Lot 178” and “Lot 205”; State Land Parcels T12N, R3W, SEC 33, LT 178 and LT 205	Parcel deed restricted to supporting Rifle Range (now ACWR) features	Yes
3	Rabbit Creek Shooting Park	117.6 (W)	Facility	ADF&G, with some parking within the ARRC ROW	Parking within the ROW for key ACWR feature	Yes
4	North Potter Marsh Visitor Facility/ Boardwalk	117.5 (M)	Facility	ADF&G with a component within the DOT&PF ROW by formal agreement	Constructed to provide visitor access and facilities to the ACWR	Yes
5	ACWR Wildlife Viewing Pullout	116.8 (M)	Pullout	DOT&PF	Constructed to support ACWR visitors	Yes
6	ACWR Wildlife Viewing Pullout	116 (M)	Pullout	DOT&PF	Constructed to support ACWR visitors	Yes
7	ACWR Wildlife Viewing Pullout	115.8 (M)	Pullout	DOT&PF	Constructed to support ACWR visitors	Yes
8	Pullout (southbound)	115.8 (W)	Pullout	ARRC, DOT&PF	Serves recreation and transportation functions; no direct connection to ACWR; not important to OWJ (i.e., ADF&G)	No
9	South Potter Marsh Visitor Facility/ Boardwalk	115.4 (M)	Facility	DOT&PF, with formal agreement for ADF&G facilities	Constructed to provide visitor access and facilities to the ACWR; formal agreement with DOT&PF	Yes

Note: ID = identification number/identifier; LT = Lot; M = mountain side; N = north; R = Range; SEC = Section; T = Township; W = west or water

<sup>a</sup> Map ID numbers continue in Table 3-2 and correspond to numbered labels in Appendix A Mapbook.

<sup>b</sup> (M) signifies that the facility is on the mountain side of the Seward Highway (or along Potter Marsh, east of the highway), and (W) signifies that the facility is on the water side (Turnagain Arm) or western side of the Seward Highway.

A transportation ROW is normally considered a land type not subject to Section 4(f) protection. However, where the highway and railroad are bound tightly on both sides by ACWR lands, certain sites within the ROW clearly function as ACWR facilities, while other sites’ functions within the ROW are less clear. The ROW is publicly owned and open to the public (key criteria from Section 4(f) regulations). For those facilities located within the DOT&PF and/or ARRC ROW, DOT&PF discussed the history, function, and importance of various features with ACWR ADF&G managers to help determine the significance of each site (significance is a key criterion from Section 4(f) regulations). DOT&PF, via consultation with ADF&G (the OWJ for this

resource), identified that Section 4(f) protections would apply for facilities that were designed and constructed for ACWR purposes, and that had a reasonable connection to ACWR features located outside the ROW. These are reflected in the Section 4(f) Considerations column in Table 2-1.

#### **2.2.1.1 GGEH BETNU TRAIL, LOT 178, AND LOT 205**

The Ggeh Betnu Trail is also known as the Seward to Seward Potter Marsh Access Trail because it runs from the Old Seward Highway/Rabbit Creek Road to the (new) Seward Highway. ADF&G developed this 1,400-foot gravel trail, in part using federal refuge-access funds under the Pittman-Robertson Act, on an overgrown roadbed starting at the end of Chenoweth Street. It follows a 33-foot easement that is merged in MOA property records with the Rabbit Creek Road ROW. Beyond the short, constructed street, the trail traverses the ROW length, then crosses a State of Alaska parcel (Legal Description: Township [T] 12 North [N], Range [R] 3 West [W], Section [SEC] 33, Lot [LT] 178; referred to as Lot 178) toward the DOT&PF Seward Highway ROW to avoid wet and steep areas. It winds through a second State of Alaska parcel (Legal Description: T12N, R3W, SEC33, LT205; referred to as Lot 205), then re-enters the DOT&PF ROW to avoid private property and ends at 154th Avenue. Signs direct users to walk an additional 0.25 mile to the North Potter Marsh Visitor Facility/Boardwalk accessed from 154th Avenue. Although the trail is outside the legislative boundary of the ACWR, ADF&G owns and manages the trail. It is open year-round and is a non-motorized trail. Space exists for one to two vehicles to park at its terminus at Chenoweth Street, but no demarcated parking lot exists.

The State of Alaska acquired Lot 178 and Lot 205, through which the trail passes, from the Alaska Range Association, a private shooting group. This was the same transaction that established the Rabbit Creek Shooting Park under State of Alaska management (Lot 205 lies across the Seward Highway from the shooting park). The lots came with restrictions on their use, limiting them to recreational purposes; see Section 2.4 Management Agreements.

#### **2.2.1.2 RABBIT CREEK SHOOTING PARK**

The Rabbit Creek Shooting Park is an extensive facility located west of the Seward Highway at approximately Seward Highway MP 117.6 and west of the railroad tracks at the base of the coastal bluff. It is the only public outdoor shooting range within the Anchorage area. The shooting park provides rifle and pistol ranges; facilities for hunter education, firearm familiarization and safety training, and marksmanship classes; and an archery range, south of the rifle range. Shooting park facilities are open to the public; fees collected partly cover the annual operation and maintenance budget. The range is most active during summer but also experiences winter use. Parking for the shooting park is located partly within the western side of the ARRC ROW.

#### **2.2.1.3 NORTH POTTER MARSH VISITOR FACILITY/BOARDWALK**

Potter Marsh is a 564-acre portion of the ACWR that lies at the refuge's southern end and east of the Seward Highway. The main visitor facility, with access at Seward Highway MP 117.6, is a boardwalk system suspended over the wetlands. A 1,200-foot driveway leads to a parking area for cars and buses that occurs on ACWR land. Educational signage and 0.5 mile of boardwalk

winding through the marsh occur mostly on ACWR land. A 1,000-foot portion of the boardwalk paralleling the Seward Highway is within the DOT&PF ROW, and an approximately 800-foot-long segment of the driveway is within the DOT&PF ROW. Rabbit Creek (*Ggeh Betnu*) flows underneath the boardwalk and provides a good spot for visitors to view spawning salmon.

#### **2.2.1.4 ALASKA COASTAL WILDLIFE REFUGE WILDLIFE VIEWING PULLOUTS**

Three pullouts are designed for wildlife viewing along the Seward Highway, and ADF&G records indicate it initiated construction or improvements (Rodman 2024). A smaller pullout on the western side of the highway (adjacent to southbound lanes) at MP 115.8 is not managed as an ACWR facility (HDR 2024). All four of these pullouts lie within the DOT&PF ROW. During summer, most visitors engage in wildlife viewing and use picnic sites at the northern end of Potter Marsh, or view and photograph birds from pullouts along the marsh. In addition to migratory birds, visitors look for muskrats, moose, bald eagles, and migrating salmon. Potter Marsh is closed to hunting. During winter, visitors typically use the southern section of the marsh to ski and ice skate, “fat tire” bike, and sometimes paraglide or kite ski.

#### **2.2.1.5 SOUTH POTTER MARSH VISITOR FACILITY/BOARDWALK**

At the southern end of Potter Marsh is a large parking lot, accessed from Potter Valley Road within the DOT&PF ROW. It serves multiple purposes but is mostly devoted to viewing of and access to Potter Marsh (ACWR). Other uses include general rest-stop parking for highway users, and mail delivery and pickup at mailboxes for residences up Potter Valley Road. ADF&G and DOT&PF are in the middle of a multi-year construction process to improve and expand the parking lot, add a public vault toilet, and formalize access via boardwalk construction and viewing platforms. ADF&G is planning a new, short boardwalk into the marsh and a boardwalk ramp to ice skating ponds (ADNR-DPOR 2024). See also Section 2.4 Management Agreements.

### **2.3 Relationship to Other Similar Lands within the Vicinity**

No other designated wildlife refuges are within the Project area. Across the mouth of Turnagain Arm from the Project area is the federal Kenai National Wildlife Refuge. Across Knik Arm from the Project area are other state refuges, including the Susitna Flats State Game Refuge. Other natural areas include CSP, which abuts the ACWR at its southern end, and the newly established Potter Marsh Watershed Park, which abuts the southeastern corner of the ACWR, across from the Old Seward Highway.

## **2.4 Management Agreements**

### **2.4.1 Ggeh Betnu Trail, Lot 178, and Lot 205**

The federal government, through the Bureau of Land Management, originally granted a large land area to the private Alaska Range Association “for fire arm range, archery range, picnic ground and recreational site purposes only” (United States of America 1961), and the Warranty Deed transferring the land to the State of Alaska carries the same provision (State of Alaska, Third Judicial District 1980). The Seward Highway later divided this parcel, leaving a portion east of the highway (Lot 178 and Lot 205) that the Ggeh Betnu Trail now traverses. As this parcel is in close proximity to the ACWR boundary, supports access to the ACWR via the trail,

and has deed restrictions pertaining to rifle range and recreation purposes, DOT&PF considers Lot 205 to be functionally part of the ACWR.

The Ggeh Betnu Trail, considered separately here from the Lot 205, has its own restrictions. ADF&G funded the trail, in part, with federal Pittman-Robertson Act funds for ACWR access. This act contains restrictions that require ADF&G to maintain the capital improvement and use the improvement for the purpose authorized in the grant (50 CFR 80.133, 80.134). The grant-receiving agency (ADF&G) may lose its ability to receive grants if it does not follow these requirements (50 CFR 80.135).

Where the trail passes a short distance through the northern state parcel (Lot 178) and on the Chenoweth Street ROW, DOT&PF determined, for the purposes of this Project, that the land area associated with the trail can reasonably be considered 33 feet wide. This is the same width as the portion of the Chenoweth Street ROW through which the trail passes.

DOT&PF formally reserved its Seward Highway ROW for use as a transportation facility. On September 9, 2013, DOT&PF granted ADF&G a temporary construction permit (TCP #110.026) for the construction of a portion of the trail within the ROW, terminating at 154th Avenue. A maintenance certification, effective September 4, 2013, is included as part of the TCP to outline the duties of the involved agencies. To reserve the rights of property ownership, the following caveat is in the maintenance certification (DOT&PF 2013):

In the event Alaska Department of Transportation and Public Facilities (ADOT&PF) finds Seward Highway right-of-way necessary to alter or add to the existing highway infrastructure, the ADF&G Division of Wildlife Conservation shall accommodate ADOT&PF. DOT&PF may at its sole discretion, assist ADF&G with the costs of relocation, removal or alteration of the Seward to Seward Potter Marsh Access Trail...

#### **2.4.2 North Potter Marsh Visitor Facility/Boardwalk**

ADF&G and DOT&PF have an air space agreement/permit for the boardwalk and driveway that occur within the Seward Highway ROW (ASA-31-2-02201, signed in December 1987 and January 1988). It permits a 6-foot width for the boardwalk and 14-foot top width (with 2:1 side slopes) for the driveway road prism. The permit was issued for the immediate width of the boardwalk only (6 feet), not for the surrounding wetlands and waters that occur within the ROW. DOT&PF considers the boardwalk where it occurs within the permitted area to be protected under Section 4(f) as a refuge facility. The wetlands throughout the length of Potter Marsh that fall within the ROW are important habitat, and the public considers them to be part of the greater ACWR. The boardwalk access driveway occurs partly within the ROW, and DOT&PF permitted it at the same time as the boardwalk. The current approximate width from the vegetation line on either side of the road is 32 feet, and the driveway is 22 feet wide. The available permit documentation is incomplete, but it does not appear that the permit contains any clause that limits the presence of the boardwalk or driveway, or otherwise implies that Section 4(f) protections should not apply.

### **2.4.3 South Potter Marsh Visitor Facility/Boardwalk**

ADF&G and DOT&PF executed a Memorandum of Agreement Regarding the Potter Marsh Improvements Project (Project No. CFHWY00603) in March/April 2020 regarding the proposed improvements at the southern end of Potter Marsh. The agreement acknowledges that ADF&G requested DOT&PF to undertake design and construction. DOT&PF agreed to do so, and ADF&G agreed to operate and maintain the project. Construction funding was shared, presumably because some portions were eligible for federal highway funding as a rest area for motorists, and those portions specifically for refuge access were not, although the agreement does not specify the technical reasons for the cost split. The parking portions of the project are complete, and the boardwalk and platforms are still slated for construction.

## **2.5 Unusual Characteristics**

An unusual characteristic associated with the ACWR is the presence of refuge facilities located outside its legislative boundaries. These are the pullouts, boardwalk, trail, and access points addressed in the preceding and following subsections. They are part of the ACWR operations and management for public access but lie outside the refuge's formal boundaries. Except for portions of the Ggeh Betnu Trail and a parcel of state land that the trail crosses, these are within the DOT&PF Seward Highway ROW.

## **2.6 Section 4(f) Applicability**

The ACWR is a designated wildlife refuge that is publicly owned; generally open to the public; and presumed significant based on its designation in Alaska law, its extent, the absence of any finding by the OWJ that it is not significant, and past DOT&PF projects declaring it a Section 4(f) property. Therefore, it qualifies for Section 4(f) protection. This includes all facilities within the ACWR boundaries, including North Potter Marsh; the parking lot and most of the boardwalk there; and the Rabbit Creek Shooting Park and archery range west of the highway, except for a portion of the shooting park parking lot. It also includes the tidal mudflat habitat west of the railroad and the wetland habitat of Potter Marsh proper.

The following subsections address the ACWR-related facilities that fall outside the ACWR legislative boundaries and within the DOT&PF or ARRC ROW. Table 2-1, above, summarizes this information.

### **2.6.1 Ggeh Betnu Trail, Lot 205, and Lot 178**

The Ggeh Betnu Trail is publicly owned, open to the public, and owned by ADF&G, and it was funded with federal refuge-access funds. It is essentially managed as part of the ACWR, although it lies outside the ACWR boundaries. The OWJ considers it important (HDR 2024). If it were not "refuge" under Section 4(f), it would be considered a stand-alone "recreation area" under Section 4(f) and would have the same Section 4(f) approval requirements as a refuge. For these reasons, DOT&PF considers the trail to qualify for Section 4(f) protection. This also applies to the segment of the trail that traverses the DOT&PF ROW, as the trail is a constructed facility for ACWR purposes that is located within a transportation ROW and has a reasonable connection to refuge features outside the ROW.

Regarding state lands associated with Ggeh Betnu Trail, DOT&PF considers Lot 205, the southern state land parcel that has deed restrictions related to refuge and recreation purposes (described above in Section 2.4.1) to be protected under Section 4(f). It is effectively part of the ACWR because of its deed restrictions and ownership/management by ADF&G. Similar to the trail, if it was not “refuge,” it would qualify for Section 4(f) protections as a “recreation area” because of its deed restrictions and the trail across it. The adjoining northern state parcel, Lot 178, has no deed restrictions and is not managed by ADF&G. Section 4(f) protections do not apply to Lot 178 as a whole but apply only to the Ggeh Betnu Trail where it crosses the parcel. In the absence of any documented width for the trail within this parcel, the same width as the Chenoweth Street ROW (33 feet) is appropriate for use where the trail crosses this parcel.

### **2.6.2 Rabbit Creek Shooting Park, Parking Lot**

The parking lot for the Rabbit Creek Shooting Park falls almost entirely within the western portion of the ARRC ROW. It is clearly important to the function of and public access to the shooting park. It is publicly owned land and generally open to the public. Therefore, DOT&PF considers the developed parking area footprint and driveway that lie within the ARRC ROW to be subject to Section 4(f) protection. However, these occur on the outside edge of the Project area. It is unlikely the Project would use land west of the railroad tracks within this area, so DOT&PF has made no effort to coordinate with the ARRC or ADF&G regarding this location.

### **2.6.3 North Potter Marsh Visitor Facility/Boardwalk**

The segment of the Potter Marsh boardwalk and driveway to the boardwalk parking lot that fall within the DOT&PF ROW are publicly owned, open to the public, and critical components of ACWR/Potter Marsh public access. Both connect continuously to areas within the ACWR boundaries. DOT&PF considers these facilities, where they are located within the DOT&PF ROW, to be subject to Section 4(f) protections. The boardwalk subject to Section 4(f) protections is an area 6 feet wide, per the permit. The driveway pavement is 22 feet wide and approximately 32 feet wide to the vegetation line on each side of the road. DOT&PF considers this 32-foot width to be subject to Section 4(f) as the only access to the Potter Marsh boardwalk access point.

### **2.6.4 Alaska Coastal Wildlife Refuge Wildlife Viewing Pullouts**

Of the four pullouts along Potter Marsh within the Seward Highway ROW, the one on the western side of the highway at MP 115.8 is not considered important to the OWJ (HDR 2024) and does not provide reasonable viewing or physical access to the ACWR. Therefore, DOT&PF does not consider it to be subject to Section 4(f). The other three pullouts, on the eastern side of the highway, have a documented history of project initiation by ADF&G and are considered official ACWR access points (Rodman 2024; HDR 2024). They are popular for waterfowl viewing, photography, and ice-skating access. They provide direct viewing access to waterfowl habitat within the ACWR boundary and direct physical access during winter on the frozen marsh surface. Therefore, DOT&PF considers these pullouts to be subject to Section 4(f) protection.

### **2.6.5 South Potter Marsh Visitor Facility/Boardwalk**

The Potter Marsh southern parking and access point has been under construction under the terms of the Memorandum of Agreement described in Section 2.4.3. This agreement

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acknowledges ADF&G's initiation of the project, and ultimate operation and maintenance responsibility. Although there are shared interests within this area (i.e., highway rest stop, Potter Valley mailboxes, and ACWR access), DOT&PF considers all parking that faces north to the marsh and is most closely associated with access via the planned new boardwalk, public toilet, and boardwalk area and marsh north of the parking to the ROW line (official ACWR boundary) to be functionally part of the ACWR; therefore, these are subject to Section 4(f). The mailboxes area and other public parking facing the Seward Highway are considered to function primarily for transportation-related purposes. DOT&PF acknowledges that "rest stop" and "refuge" users may use any of the parking but considers it reasonable that these other areas are not subject to Section 4(f) protections.

## 3 Chugach State Park

### 3.1 Overview

**Location and Map Reference:** CSP is located mostly within the MOA (ADNR-DPOR 2016).

The park's westernmost boundary lies in the western foothills of the Chugach Mountain Range and is 7 miles east of Downtown Anchorage. CSP is further defined by Knik Arm and the Knik River on the north, Turnagain Arm on the south, and Upper and Lower Lake George as well as the Chugach National Forest on the east (ADNR-DPOR 2016). See Figure 1-1 and Appendix A Mapbook, pages 2 through 10.

CSP's founding legislation identifies that the "presently state-owned land and water, and all that acquired in the future by the state, lying within the parcels described in this section are designated as the Chugach State Park" (AS 41.21.121). The legislative boundary encompasses a mix of land ownership patterns, including state, federal, and private lands. It includes areas of Turnagain Arm tidelands and waters. DOT&PF and ARRC have ROWs for their respective transportation corridors; both are state agencies, and their respective ROWs came to the state separately from the federal government.

ARRC has a 100-foot ROW on either side of its track centerline. The recognized legal ROW follows the original railroad track alignment; therefore, the 200-foot-wide ROW is not centered where track has been realigned.

DOT&PF has a highway ROW through CSP from Seward Highway MP 115 to areas south of the Project's southern terminus at MP 98.5. The ROW is generally set as 150 feet on either side of the highway centerline. Similar to the ARRC ROW, the legal highway ROW reflects an older alignment and has not always been legally changed within areas where the highway has been shifted or straightened. DOT&PF has purchased slivers of private parcels for highway ROW through Indian and Bird. Where the highway corridor overlaps the ARRC ROW, DOT&PF and ARRC have agreements in place for DOT&PF to operate and maintain the highway. Ultimately, ARRC is the ROW landowner, and DOT&PF has legal rights of use within these areas. This results in highway ROW widths of less than 300 feet within many segments of the Project area. Due to changes over time in both the rail and highway alignments, discrete locations occur where the highway travel lanes are wholly within the ARRC ROW.

**Size:** Approximately 495,000 acres (ADNR-DPOR 2016)

**Ownership/Management:** ADNR, Division of Parks and Outdoor Recreation (DPOR).

The *Chugach State Park Management Plan* (CSPMP), citing state law at AS 41.21.122, states that the management responsibility of the park is assigned to ADNR for control, development, and maintenance, and DOT&PF is responsible for the repair and maintenance of all existing public roads within CSP (ADNR-DPOR 2016:1). The CSPMP specifies that the control of highway access and roadside structures within CSP is ADNR's responsibility, and ADF&G cooperates with ADNR for park purposes that are relevant to their duties (e.g., fish habitat, wildlife).

According to the founding statutes (AS 41.21.121, AS 41.21.122), the Alaska Legislature declared that CSP's purpose is to:

1. Protect and supply a satisfactory water supply for people's use;
2. Provide people with recreational opportunities by providing areas for specified uses and constructing necessary facilities within those areas;
3. Protect areas of unique and exceptional scenic value;
4. Provide for the public display of local wildlife; and
5. Protect the existing wilderness characteristics of the easterly interior area.

The statute specifies that "the eastern area of the park shall be operated as a wilderness area, the central area as a scenic area, and the periphery areas as recreational areas" (ADNR-DPOR 2016:2). These are further defined in park management plans. The Project corridor passes through the periphery of recreational areas.

**Public Access:** CSP has dozens of access points, trailheads, campgrounds, and facilities from its northeastern corner on Knik River Road southward along Turnagain Arm. Access to park lands and recreational activities is an ongoing concern as demand has increased, and residential development along the park boundaries has constricted access locations and parking. CSP has identified a recreation development zone that follows the Seward Highway corridor as well as surrounds the Indian and Bird communities that recognizes the concentrated recreation facilities and access within the area (ADNR-DPOR 2016: Figure 6).

### **3.1.1 Bird Creek Regional Park**

Bird Creek Regional Park is approximately 2,200 acres owned by MOA and generally surrounds the community of Bird within the larger bounds of CSP. Per agreement with the MOA, DPOR has taken management responsibility for the municipal Bird Creek Regional Park and manages it as part of CSP. For the purposes of this document, Bird Creek Regional Park is discussed as part of CSP. It includes Bird Creek Overflow Campground north of the highway adjacent to Bird Creek, as well as the trail network that extends back Bird Creek Valley that is accessed from an unpaved extension of Konikson Road.

**Location and Map Reference:** Along the valley floor of Bird Creek and part of Penguin Creek, north of the community of Bird.

**Size:** approximately 2,200 acres.

**Ownership/Management:** Owned by MOA; managed as part of CSP by DPOR via agreement. Both DPOR and MOA are OWJ of this property.

**Public Access:** There are multiple access points, including the driveway and nearby trails to the Bird Creek Overflow Campground, as well as the unpaved road that extends beyond Konikson Road to a trailhead north of the community.

In the following sections, Bird Creek Regional Park descriptions are folded into the larger CSP descriptions.

## 3.2 Activities, Features, and Attributes

The CSPMP describes the park's characteristics as "extensive ocean shoreline, abundant lakes, massive glaciers and ice fields" (ADNR-DPOR 2016:1). CSP is largely undeveloped, which makes it particularly attractive to wilderness advocates and others who enjoy self-sufficient recreation (ADNR-DPOR 2016:30). The entire park has approximately 280 miles of developed trails, four campgrounds, and eight public use cabins. Major park activities include camping, picnicking, berry picking, photography, wildlife viewing, backpacking, hiking, summer and winter biking, nature study, sightseeing, rock and ice climbing, hang gliding, boating, all-terrain vehicle (ATV) use, fishing, hunting, cross-country skiing, and snowmachining (ADNR-DPOR 2016:29). Most of the terrain is best suited for the recreationist who is prepared to enjoy a backcountry experience.

### 3.2.1 Chugach State Park, Turnagain Arm Planning Unit

The entire Project area lies within CSP's Turnagain Arm Planning Unit,<sup>1</sup> with waters of Turnagain Arm to the south and mountainous terrain to the north. Park features—and therefore park activities—occur within the highway ROW at multiple locations. Because of this somewhat unusual situation, Section 3.2.2 examines park-like features within the ROW in more detail. This subsection provides an overview of activities, features, and attributes within the Turnagain Arm Planning Unit.

The Turnagain Arm Planning Unit consists of 98,000 acres, of which approximately 15,000 acres are tidelands and waters of Turnagain Arm. The highway and rail corridor traverses rocky outcrops and mudflats through the western edge of this unit. The Seward Highway provides access to multiple recreational sites and areas within the Turnagain Arm Unit that are popular with residents and tourists. A recreational development zone has been established along the length of the Seward Highway, at Bird Creek Regional Park, and within portions of Indian. The designation is to meet the public's more intensive recreational needs by providing easy and well-defined access points into the park and developing appropriate facilities such as parking and trailheads, vehicle and tent camps, picnic and group areas, and high-standard trails for all ages and abilities (ADNR-DPOR 2016:37, Figure 6). The adjacent natural environment zone, which includes much of the area visible from the Seward Highway, may be relatively undeveloped and minimally disturbed, have high scenic qualities, and be intended to provide an intrinsic natural outdoor setting in which visitors can recreate (ADNR-DPOR 2016:38). The wilderness zone does not occur within the Project area.

Major recreational activities within the Turnagain Arm Planning Unit include wildlife viewing, rock climbing, wildlife and scenery photography, hiking, bicycling on the Indian to Girdwood Bike Path, sport fishing, bore tide/kite surfing, skiing/participating in snow sports, and camping. Scenic driving occurs on the Seward Highway. While DPOR and DOT&PF generally have considered the highway ROW and park to function and be administered separately, park features are located within the ROW. For many, the highway functions as a park road, providing

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<sup>1</sup> At the northern end of the Project corridor, the study area overlaps slightly with the Hillside Unit. Within this area, the Hillside Unit occurs uphill of the Turnagain Arm and McHugh Lake Trails; land downhill of these trails, where the highway occurs, is part of the Turnagain Arm Planning Unit.

scenic views, wildlife viewing, and access to park amenities. Highway users pull off at park trailheads and scenic waysides as part of their scenic driving experience.

The Seward Highway corridor provides access to front- and backcountry terrain. Numerous developed facilities within the Project corridor vicinity support these activities and opportunities, including scenic parking areas, educational signs and kiosks, campgrounds, trailheads, trails, and pullouts.

Table 3-1 summarizes the activities, features, and attributes within the Turnagain Arm Planning Unit.

**Table 3-1. Chugach State Park, Turnagain Arm Planning Unit activities, features, and attributes.**

Activities	Features	Attributes
<ul style="list-style-type: none"> <li>• Wildlife and scenic viewing</li> <li>• Boretide viewing</li> <li>• Hiking/trail running</li> <li>• Biking</li> <li>• Fishing</li> <li>• Camping</li> <li>• Rock/ice climbing</li> <li>• Sport hunting and trapping</li> <li>• Wildlife and scenery photography</li> <li>• Surfing, kiteboarding, and paddle boarding</li> <li>• Mountain biking and ATV use in Bird Creek Valley</li> </ul>	<ul style="list-style-type: none"> <li>• Scenic viewpoints</li> <li>• Trails</li> <li>• Trailheads</li> <li>• Campgrounds</li> <li>• Educational signs</li> <li>• Parking and pullouts</li> <li>• Historic properties</li> <li>• Steep mountainsides/cliffs</li> <li>• Ocean, mudflats, estuaries, and rocky coastline</li> <li>• Streams, cascades</li> <li>• Natural forest and alpine vegetation</li> </ul>	<ul style="list-style-type: none"> <li>• Expansive vistas of water and mountains from both developed and undeveloped park areas</li> <li>• Wildlife habitat</li> <li>• Park access from highway</li> </ul>

### 3.2.2 Evaluating Park Features within Transportation Rights-of-Way

This subsection primarily focuses on features that appear to function as part of CSP but are located within the existing DOT&PF and/or ARRC ROW. The following describes all potential park features within and adjacent to the ROW, and outlines the criteria and context used to determine Section 4(f) applicability. Historic sites that may be located within CSP are not described here unless they may also be considered park recreational features.

While Section 4(f) applies to any designated park land that is publicly owned, open to the public, and considered significant, DOT&PF evaluated numerous sites potentially related to the park that occur within the ROW. A transportation ROW normally is considered a separate land type not subject to Section 4(f) protection. In this case, certain sites within the ROW clearly function as park facilities, and the function of other sites within the ROW is less clear. DOT&PF identified all potential park sites located within the ROW, then considered whether Section 4(f) applied. DOT&PF applied the Section 4(f) regulations to each site and summarized the applicability of Section 4(f) in each circumstance by using the conditions (A through E) described below and listed in the Section 4(f) Considerations column of Table 3-2 at the end of this subsection.

DOT&PF, via consultation with CSP, identified any given park feature located within the ROW as being a Section 4(f) protected resource when it met one of the following conditions:

- A. It is a formally designed and constructed facility for park purposes located within a transportation ROW and has a direct, terrestrial connection (road or trail) to park features outside the ROW.
- B. It is an area that the recreating public uses that is partially within the ROW and partially on adjacent CSP land (e.g., a rock-climbing route<sup>2</sup> that starts within the ROW and ascends beyond the ROW into CSP).
- C. It is a formally recognized trail that weaves in and out of the ROW.

A site is identified as not qualifying for Section 4(f) protections if it meets one of these conditions:

- D. It is a pullout or parking area within the ROW that serves multiple transportation and recreation purposes<sup>3</sup> and is not connected by road or substantial trail to the park. These are pullouts that:
  - Are not formally designed and constructed for park access;
  - Have no substantial physical access facilities (roads or trails) to the adjacent park, even if people can walk into the park by crossing the road, then bushwhacking or following intermittent social trails; and
  - The OWJ (CSP) does not consider it important.<sup>4</sup>
- E. It is an area within the ROW that is used for recreation activities that occur entirely within the ROW, such as a climbing area or route that is wholly within the ROW. These are areas that are not formally designated in park management plans and the OWJ (CSP) does not consider important.

Table 3-2 summarizes DOT&PF's evaluation of the park features along the corridor within the transportation ROW to identify which ones qualify for Section 4(f) protection. The Section 4(f) Considerations column of Table 3-2 provides a Section 4(f) applicability reasoning summary for each location, using the considerations (A through E) identified above. Where space allows, a

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<sup>2</sup> Rock climbing routes were researched using the *Alaska Rock Climbing Guide* (Gray 2021), online data from [www.mountainproject.com](http://www.mountainproject.com) (Mountain Project 2025) and [www.thecrag.com](http://www.thecrag.com) (The Crag 2025), and records of Project meetings with representatives from Climbers Alliance: Southcentral Alaska. It is difficult to determine from a horizontal map the extent of climbing routes that inherently include a vertical component. The application of Condition B (or E) is based on the available information; unverified areas are acknowledged.

<sup>3</sup> "Multiple transportation and recreational purposes" may include, for example, slow-vehicle turnout, highway rest stop, general parking, scenic and wildlife viewing, and parking for informal park access. This is consistent with FHWA guidance on multiple-use public property, as describe in the *FHWA Policy Paper*, Question 4 (FHWA 2012)

<sup>4</sup> DOT&PF met with OWJs to help determine which sites were important. See also Section 6.2 of the *Individual Section 4(f) Evaluation* report regarding consultation with OWJs.

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reminder about what the letters signify is also included.<sup>5</sup> The conclusions reflected in Table 3-2 will be reflected in maps of CSP's Section 4(f) boundaries, which effectively extend the reach of the park to encompass areas of transportation ROW where Section 4(f) resources within the ROW have been identified. These maps will be developed and used to assess CSP impacts with respect to Section 4(f). Numbering of sites in Table 3-2 is reflected in Appendix A Mapbook, pages 2 through 10.

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<sup>5</sup> Some sites are listed that are wholly outside the transportation ROW and therefore are afforded protections because they are within CSP. However, they are included herein for context and completeness of known park features along the highway, and because they are often related to parking pullouts located within the ROW; these are marked as "Park" in the Section 4(f) Considerations column of Table 3-2.

**Table 3-2. Section 4(f) applicability of park features within DOT&PF and ARRC rights-of-way.**

Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
10	Potter Section House (HS-1)	115.2 (W)	Facility	The Section House is listed in the CSPMP as a park facility and serves as CSP headquarters. It is also a State Historic Site, an AHRs site, and an NRHP-listed property; see Section 4.1.	ADNR leases a 0.93-acre property from ARRC	Park	Yes
11	Potter Locomotive and Interpretive Area	115.2 (W)	Facility	The Potter Section House leased area includes public parking and a park interpretive area—kiosks and rotary snowplow—adjacent to the Potter Section House (Map ID 10). Public latrines are on a permitted area of the DOT&PF ROW. The parking area often serves as overflow parking for the Potter Creek Trailhead, located across the highway. The CSPMP lists this area, with Potter Section House, as a CSP facility.	ADNR leases a 0.93-acre property from ARRC; latrines are outside ARRC lands, but within the DOT&PF ROW by agreement with DOT&PF	Park	Yes
12	Potter Creek Trailhead	115.1 (M)	Trailhead	This feature is a driveway from the Seward Highway, lower parking area, overlook onto a meadow with interpretive signs, and fee station. A driveway connects the lower and upper parking areas, and includes auxiliary parking along the shoulder. The kiosk and trailhead are within the DOT&PF ROW, and the upper parking area and latrines are partially within the DOT&PF ROW. The CSPMP lists it as a CSP facility.	DOT&PF ROW	A; connected to CSP	Yes
13	Turnagain Arm Trail (in ROW)	114.9 (M)	Trail	The "historic Turnagain Arm Trail runs along the northern shore of Turnagain Arm from the Potter Creek access to Windy Corner" (ADNR-DPOR 2016:119). Sections of the trail overlap the DOT&PF ROW, including at the Potter Creek Trailhead, at the Rainbow Trailhead, along a 560-foot section between Rainbow and Windy Corner, and at the Windy Corner Trailhead. The trail is marked as part of the Iditarod National Historic Trail system. Unmaintained segments of old trail cuts occur southeast of Windy Corner, near Falls Creek, and near Indian. The maintained portion of the Turnagain Arm Trail is a recreational feature of the park. See also Map IDs 46, 49, and 57.	DOT&PF/CSP	C; park trail weaving into ROW	Yes
14	Pullout	114.6 (M)	Pullout	This is an approximately 500- by 50-foot parking area with driveway connection to the highway at each end. ADNR has currently blocked the entrances with boulders to prevent illegal camping. The remaining area offers enough room for 2–3 cars to pull off the highway and park in front of the boulders.	DOT&PF ROW	D; Multi-purpose/ not connected	No

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
15	Sea Cave	114.0 (W)	Rock Climbing	This feature has rock climbing on both the roadside cliff and rocky outcrop across the railroad tracks from the highway, accessible and climbable at low tide. No specific parking or access was created for users. Climbers typically park nearby on the MP 114 shoulder. Climbers Alliance listed the feature as a valuable climbing area for preservation.	ARRC	B; CSP feature extends into ROW	Yes
16	Picnic Rock	113.9 (W)	Rock Climbing/ Scenic Viewing	This feature is a rocky outcrop across the railroad tracks from the highway. While the CSPMP recommends a new scenic overlook and preservation of the rock, CSP has no current priorities for a facility here.	DOT&PF/ARRC	B; CSP feature extends into ROW	Yes
17	Grunge Wall	113.3 (M)	Rock Climbing	This feature is an ice/rock-climbing area in an amphitheater. It appears to start within the DOT&PF ROW and extends into CSP.	DOT&PF/CSP	B; CSP feature extends into ROW	Yes
18	Grunge Wall Pullout	113.2 (W)	Pullout, Scenic Viewing, Slow Vehicle Turnout	This feature is a widened shoulder and slow vehicle turnout lane. Ice accumulates during winter on the opposing rock wall and comes down onto the highway, and DOT&PF constructed the widened shoulder to accommodate shifting traffic lanes. The CSPMP recommends coordinating with DOT&PF to establish pullout and parking within this area to meet the needs of ice and rock climbers. It appears DOT&PF constructed a pullout to meet spring highway maintenance needs, and perhaps ADNR requests.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
19	Pullout	113.1 (M)	Pullout	This feature is a 180- by 35-foot pullout likely used for rock-climbing access.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
20	Pullout	112.9 (M)	Pullout	This feature is a 110- by 20-foot pullout likely used for rock-climbing access.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
21	Crack in the Woods	112.7 (M)	Rock Climbing	This feature is a rock-climbing area that primarily is within CSP but extends into the DOT&PF ROW. No designated parking or access trails into the park exist. Parking for climbing here appears to be informal shoulder pullouts. Climbers Alliance noted Crack in the Woods climbing and parking as important areas for preservation.	DOT&PF	B; CSP feature extends into ROW	Yes
22	Pivot Point	112.4 (M)	Rock Climbing	This feature is a popular rock-climbing area; it also encompasses areas known as Good Times Wall, Hole in the Wall, Teenage Dome, Lefty Area, and Shot Rock. The area is primarily within CSP but extends into the DOT&PF ROW.	DOT&PF	B; CSP feature extends into ROW	Yes

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
23	Pullout	112.4 (M)	Pullout	This feature is a flat gravel/sandy extension beyond the paved highway shoulder approximately 100 by 13 feet wide and used to access nearby rock climbing at Crack in the Woods (Map ID 21) and Pivot Point (Map ID 22). Climbers Alliance noted this parking and climbing access as an important area for preservation.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
24	Good Vibes Wall	112.2 (M)	Rock Climbing	This climbing amphitheater cliff area is within the DOT&PF ROW. Many climbs within the ROW no longer exist due to rockfall. Note: Good Times Wall (sometimes called Upper Good Vibes Wall) and High Vibes Wall are both farther uphill from the highway within CSP and are sometimes considered as extensions of the Pivot Point climbing area (Map ID 22) or the Boy Scout Rocks area (Map ID 25).	DOT&PF	E; All climbing appears to be within DOT&PF ROW	No
25	Boy Scout Rocks	112.1 (M)	Rock Climbing	This feature is a popular rock-climbing area within the McHugh Creek Day Use Area (Map ID 28). Within this area, the highway is within the ARRC ROW, and the DOT&PF ROW extends into the day-use area and trails. The Boy Scout Rocks area appears to be in both the DOT&PF ROW and CSP. It appears to be a subset of, or overlaps with, a climbing area called Fundamentalists' Cut (Map ID 27).	DOT&PF	B; CSP feature extends into ROW	Yes
26	Pullout	112.0 (W)	Pullout	This feature is a widened gravel shoulder area for scenic viewing and parking for rock-climbing activities on the mountainside.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
27	Fundamentalists' Cut	112.0 (M)	Rock Climbing	Rock climbing occurs at the crag approximately 0.1 mile north of the day-use area turnoff. Parking is either along the gravel, widened shoulder area across the highway from the rock face, or at McHugh Creek Day Use Area (Map ID 28). From McHugh, climbers follow a paved trail above the volunteer park host parking area to a viewpoint of Knik Arm, go under the railing, and head to the telephone pole at the top of the cliff. It encompasses the DOT&PF ROW and parts of CSP.	DOT&PF	E; All climbing appears to be within DOT&PF ROW	No

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
28	McHugh Creek Day Use Area	111.8 (M)	Trailhead	This feature is a major CSP developed facility. The lower/outer paved parking area, latrine, information kiosk, and fee station are within the DOT&PF ROW. It connects to upper levels and a trail system with a paved driveway and pathways. The entire facility spans approximately 5 acres and has parking for approximately 90 vehicles. This site is heavily used and requires a State Parks Pass or day-use parking fee, including the parking area within the ROW. The CSPMP lists it as a CSP facility.	DOT&PF	A; Connected to CSP	Yes
29	Pullout	111.6 (M)	Pullout	This is a highway pullout, used as a staging area for recent construction projects.	DOT&PF	D; Multi-purpose/ not connected	No
30	Weeping Wall	111.6 (M)	Rock Climbing	This feature is accessible from the adjacent pullout. The rock-climbing area is solely within the DOT&PF ROW.	DOT&PF	E; Wholly within ROW	No
31	Resolution Bluff/ Der Rinecrag/ Twinkle Toes	111.3 (M)	Rock Climbing	Resolution Bluff and Der Rinecrag climbing routes appear to be fully within CSP. The most common access is to park at McHugh Creek and hike 1 mile along Turnagain Arm Trail. Twinkle Toes main routes appear to be within the DOT&PF ROW.	CSP	Park (Resolution Bluff and Der Rinecrag); E (Twinkle Toes)	Resolution Bluff and Der Rinecrag = Yes; Twinkle Toes = No
32	Pullout	111.2 (M)	Pullout	This is a 100- by 50-foot pullout area, likely used to access Twinkle Toes climbing. The parking area was not built specifically to provide access to climbing.	DOT&PF	D; Multi-purpose/ not connected	No
33	Pullout	110.8 (M)	Pullout	This is a 300- by 40-foot turnout with two driveway connections to the highway. The body of the turnout is blocked at each entrance by small boulders to prevent illegal camping. Parking for a few vehicles remains at each driveway end.	DOT&PF	D; Multi-purpose/ not connected	No
34	Pullout	110.4	Pullout	This is a 30- by 50-foot parking area. Climbing Alliance listed this climbing access as a key area for preservation. It provides parking for the Beginners Rock and Bermuda Triangle (Map ID 35) rock-climbing areas.	DOT&PF	D; Multi-purpose/ not connected	No
35	Bermuda Triangle	110.4 (M)	Rock Climbing	This feature has 15 established routes. Climbing Alliance listed this climbing feature as a key area for preservation. The entirety of the Bermuda Triangle climbing area and parking appears to be within the DOT&PF ROW.	DOT&PF	E; Wholly within ROW	No

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Section 4(f) Property Identification**

Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
36	Beluga Point Viewpoint	110.3 (W)	Parking, Scenic Viewing	This is a large, paved pullout with an access point to the highway at each end. It is popular for scenic viewing, wildlife viewing (beluga, Dall sheep), bore tide viewing, and exploring. It offers parking for approximately 35 vehicles. While crossing the ARRC tracks is discouraged, many visitors walk across or along the tracks to explore the informal pathways and enjoy the water views. The site is also used by windsurfers seeking access to Turnagain Arm. The area has a long cultural history, and a known archaeological site is nearby. CSP stated interest in creating a railroad undercrossing and fee station here for access to water-side park lands, likely before the Project would be constructed. However, no CSP project is currently underway. The CSPMP lists this site as a CSP facility with interpretive display, scenic viewpoint, and "trailhead/parking lot."	Driveway connections are within the DOT&PF ROW; parking is fully within the ARRC ROW	A; Connected to CSP	Yes
37	Sunshine Ridge Parking	110 (M)	Turnout	This is a 130- by 30-foot, off-highway parking setback approximately 60 feet from the highway, with a single driveway connection. Parking is within the DOT&PF ROW. It does not currently have latrines, but CSP (as OWJ) has stated this upgrade is desired. It accesses the Turnagain Arm Trail (Map ID 13) and Sunshine Ridge (Map ID 38) climbing area, and CSP considers it an important, if unadvertised, park access point. Climbers Alliance noted the parking and approach to the Sunshine Ridge/Glak's Place/Tree Fort climbing area is important for preservation.	DOT&PF	A; Connected to CSP	Yes
38	Sunshine Ridge	110 (M)	Rock Climbing	This climbing area spans areas referred to as Sunshine Ridge/Glak's Place/Tree Fort and has 51 established routes identified (39/6/6), spanning both the DOT&PF ROW and CSP. Access is from the MP 110 parking turnout (Map ID 37) and the Turnagain Arm Trail (Map ID 13). CSP noted this as an important area. Climbers Alliance noted the Sunshine Ridge/Glak's Place/Tree Fort climbing area is the most important area for climbing preservation.	DOT&PF/CSP	B; CSP feature extends into ROW	Yes
39	Northwest Passage	109.8 (M)	Rock Climbing	This is a rock-climbing area that initiates within the DOT&PF ROW and extends into CSP. CSP noted a social trail connects to the climb. Climbers Alliance noted maintaining parking is important.	DOT&PF/CSP	B; CSP feature extends into ROW	Yes

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
40	Pullout	109.8 (W)	Pullout	This is a widened waterside pullout, approximately 200 by 15 feet. It may serve as a slow-vehicle turnout and parking for nearby rock climbing or scenic viewing. CSP stated it is parking for Northwest Passage (Map ID 39) climbing, but CSP does not manage this pullout for recreation.	ARRC	D; Multi-purpose/ not connected	No
41	Sky Pilot	109.4 (M)	Rock Climbing	This is a rock-climbing area. Climbing routes are entirely within CSP.	CSP	Park	Yes
42	Pullout	109.1 (W)	Pullout	This is a widened waterside shoulder/pullout, approximately 300 by 15 feet. It provides parking to access a popular water gathering spot on the mountainside. Recent rockfall mitigation projects modified the area to close and remove access to the water. It may currently serve as a slow-vehicle turnout, or parking for nearby rock climbing or scenic viewing.	ARRC	D; Multi-purpose/ not connected	No
43	Turnout	108.9 (M)	Turnout	This is a 275- by 30-foot parking area with a driveway access point to the highway at each end.	DOT&PF	D	No
44	Rainbow Point Scenic Overlook	108.7 (W)	Turnout	This is a waterside turnout, 300 by 25 feet, with a driveway access point to the highway at each end. It provides parking for scenic and wildlife viewing. The CSPMP lists this site as an existing CSP facility within the CSPMP. No trail connection to CSP currently exists.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
45	Rainbow Valley Road Parking	108.5 (M)	Parking	This segment of abandoned highway is used as a winter parking and chain-up area for residents who live up the steep road to Rainbow Valley and occasionally by others.	DOT&PF	D; Multi-purpose/ not connected	No
46	Rainbow Trailhead	108.4 (M)	Trailhead/ Parking	This formal CSP trailhead includes a parking area with driveway access to the highway, and trail connections at its northern end to connect to the Turnagain Arm (Map ID 13) and Rainbow Peak Trails. The site is approximately 0.33 acre and has capacity to hold up to 30 vehicles. The entire trailhead parking area and approximately 500 feet of trail is within the DOT&PF ROW. The site currently does not require a State Parks Pass or day-use parking fee, but CSP stated the intention is to make it a fee area. The CSPMP lists it as a CSP facility. See other places the trail occurs within the ROW at Map IDs 12, 13, 49, and 57.	DOT&PF	A	Yes
47	Scenic Overlook	108.3 (W)	Pullout	This is a paved, widened shoulder/turnout, approximately 250 by 25 feet, with scenic views.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
48	Pullout	108.1 (M)	Turnout	This includes a 650-foot-long, paved, northbound, slow-vehicle turnout lane with a 20-foot-wide paved shoulder and a 150- by 60-foot gravel parking area. This area is part of an abandoned previous road alignment.	DOT&PF	D; Multi-purpose/ not connected	No
49	Turnagain Arm Trail (in ROW)	107.7 (M)	Trail	This trail goes into the DOT&PF ROW for approximately 560 feet (0.11 mile) in this location. See other places the trail occurs within the ROW at Map IDs 12,13, 46, and 57.	DOT&PF/CSP	C; Park trail weaving into ROW	Yes
50	Scenic Overlook	107.6 (W)	Pullout	This includes a 600-foot-long, paved, southbound, slow-vehicle turnout lane with a 25-foot-wide paved shoulder stopping/parking area and a guardrail at the perimeter. The site has Gold Rush interpretive panels but no park access. CSP and DOT&PF have a formal agreement for this site.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
51	Party World	107.2 (M)	Rock Climbing	This feature has rock climbing, all within the DOT&PF ROW. The parking area is approximately 20 by 25 feet and lined with boulders. CSP passively manages this site with large rocks and has posted a no camping sign. CSP indicated the site has been an attractive nuisance and stated the site has low park importance.	DOT&PF	E; Wholly within ROW	No
52	Pullout	107 (M)	Pullout	This feature has gravel/sand beyond the paved shoulder, and provides some parking and access to climbing and bouldering within CSP. The CSPMP suggests this area was considered for material for the Windy Corner project, and the reclamation area location could offer potential for new trailhead parking to Turnagain Arm Trail (Map ID 13).	DOT&PF	D; Multi-purpose/ not connected	No
53	Pullout	106.9 (M)	Pullout	This is a 100- by 20-foot sand/gravel pullout lined with boulders along its perimeter. It provides parking for climbing.	DOT&PF	D; Multi-purpose/ not connected	No
54	Goats Head Soup	106.9	Rock Climbing	This climbing area is partially within the DOT&PF ROW and some climb within CSP. This site was treated as a Section 4(f) resource as part of the Windy Corner project. Climbers Alliance identified the Goat's Head Soup cliff as an important climbing area for preservation.	DOT&PF	B	Yes
55	Windy Corner Scenic Overlook	106.8 (W)	Pullout	This pullout is located within the DOT&PF and ARRC ROWs. It measures 30 by 350 feet, has two driveway connections to the highway, and is popular for scenic viewing. While the spot may provide parking for visitors to walk to sheep viewing locations, it does not provide sheep viewing itself.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
56	Hungry Man	106.7 (M)	Rock Climbing	This feature has climbing close to the utility line and is within the ROW.	DOT&PF	E; Wholly within ROW	No
57	Windy Corner Trailhead	106.6 (M)	Trailhead	The Windy Corner Trailhead is a 30- by 220-foot pullout at the southern end of the maintained Turnagain Arm Trail. The pullout and approximately 300 feet of trail are within the DOT&PF ROW. The pullout is close to a popular Dall sheep viewing area; it may provide off-shoulder parking or turnaround capacity for travelers who spot sheep on the hillside and are unable to stop at the Windy Corner Scenic Overlook on the water side at MP 106.8 (Map ID 55). No State Parks Pass or day-use parking fee is required. The CSPMP lists it as a CSP facility. See other places the trail occurs within the DOT&PF ROW at Map IDs 12, 13, 46, and 49.	DOT&PF	A	Yes
58	Son of Kong	106.6 (W)	Rock Climbing	This rock formation for climbing is in both CSP and the ARRC ROW. It appears to also be a bouldering area known as "The Scar." CSP does not consider this a popular, frequently used, or otherwise important climbing area. It has no safe parking, and access requires crossing railroad tracks. Because CSP does not consider it important, the portion within the ROW would not be subject to Section 4(f). But the climbs outside the ROW are subject to Section 4(f) because it is part of CSP land.	ARRC/CSP	D; Multi-purpose/ not connected	In ROW: No In CSP: Yes
59	Pullout	106.5 (W)	Pullout	This feature is widened pavement (500 by 15 feet) beyond the existing shoulder for slow-moving vehicle pullout or scenic viewing.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
60	Pullout	106.2 (M)	Pullout	This is a long, flat, sandy/gravel pullout area (500 by 20 feet) beyond the paved shoulder. It likely provides parking for the Dino Head climbing area (Map ID 62).	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
61	Pullout	106.1 (W)	Pullout	This feature is a paved, widened shoulder, approximately 225 by 20 feet. It likely provides parking for the Dino Head climbing area (Map ID 62).	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
62	Dino Head	106.1–105.9 (M)	Rock Climbing	The Dino Head climbing area sits above the highway on a historical portion of the Turnagain Arm Trail/ Potter Connecting Trail that CSP does not currently maintain as a recreation trail. It is popular because of the number and quality of the climbs, and because it seems far from the highway (in comparison to others such as Fundamentalists' Cut [Map ID 27]). Access is from the highway. Climbers Alliance identified it as an important climbing area for preservation.	CSP	Park	Yes

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
63	Pullout	105.9 (W)	Pullout	This is a paved, widened shoulder, approximately 255 by 15 feet (double the regular paved shoulder width). It likely provides parking for the Dino Head climbing area (Map ID 62). Climbers Alliance noted the parking and approach was an area of preservation concern.	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
64	Falls Creek Trailhead	105.6	Trailhead	This paved pullout offers parking for approximately 12 vehicles. It offers the only access to Falls Creek Trail, a steep and popular trail to an alpine lake. No State Parks Pass or day-use parking fee is required. Part of the widened shoulder area is within the DOT&PF and ARRC ROWs, and part is only within the DOT&PF ROW. A portion of the trail passes through the ROW. The CSPMP lists this site as a CSP facility. As OWJ for this project, CSP noted plans to extend Turnagain Arm Trail (Map ID 13) parallel to the historical alignment to Falls Creek, which would require more parking at Falls Creek.	DOT&PF/ARRC	A; Connected to CSP	Yes
65	The Grotto Pullout	104.8 (M)	Pullout	This is a small, paved pullout, approximately 16 by 30 feet. The CSPMP identifies The Grotto as a popular pullout on the mountainside that needs upgrades to make access and use safer.	DOT&PF/ARRC	E; Wholly within ROW	No
66	Pullout	104.6 (M)	Parking	This is a grassy area that serves as a pullout for the Red Gate climbing area (Map ID 67).	DOT&PF/ARRC	D; Multi-purpose/ not connected	No
67	Red Gate	104.6 (M)	Rock Climbing	This area along the highway is known for its long slab climbs. It appears demolished by a recent rockfall mitigation project. It is identified herein to maintain consistency with guidebooks.	DOT&PF/ARRC	E; Wholly within ROW	No
68	Indianhouse Mountain Trailhead	104.4 (M)	Trailhead	This small, paved pullout provides parking and trail access to Indianhouse Mountain. The trail is not in CSP maps or plans and is considered a popular social trail. Parking is limited (3–4 cars). The pullout and trail terminus are within the DOT&PF ROW and are the only access to the trail.	DOT&PF	A; Connected to CSP	Yes
69	Indian Point Scenic Overlook	104.2 (W)	Pullout (blocked)	The CSPMP notes this feature as a proposed CSP area. It appears to be blocked by a guardrail; it does not exist as a current pullout.	DOT&PF/ARRC	Not applicable	No

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
70	Indian to Girdwood Bike Path	104 to 90	Trail	The Indian to Girdwood Bike Path (often called the “Bird to Gird” Trail, as it was known prior to its extension north to Indian), is a designated National Recreation Trail that parallels the Seward Highway and railroad tracks along Turnagain Arm within CSP. This non-motorized, separated, paved trail runs between the Alyeska Highway in Girdwood (MP 90) and Indian Road (MP 104), with access points at Indian Creek Trailhead, Bird Creek Campground and Trailhead, Bird Point, and other minor pullouts along the highway. Portions of the pathway are located on MOA Heritage Land Bank land (near MP 100) and are managed by CSP through a management agreement (see Section 3.4). The agreement acknowledges it is a CSP facility where it is within the ROW. The CSPMP lists it as a CSP facility. Approximately 2 miles of trail are within the overlapping DOT&PF/ARRC ROWs within the Project area. The entire trail is wheelchair accessible, and it includes numerous rest stops, with picnic tables and benches, educational features/interpretive signs, and viewing telescopes. The trail has highway underpasses at Indian (MP 103) and Bird Flats (MP 98.7), where the pathway shifts from one side of the highway to the other, and an underpass at Bird (MP 100.5) to provide a community connection. It is used by bikers, pedestrians, cross-country skiers, and others.	ADNR/DOT&PF/ARRC/MOA	C; Park trail weaving into ROW	Yes
71	RS 2477 Easement (Indian Valley Trail/Iditarod) (HS-2)	103.1 (M)	Trail Easement	This State of Alaska RS 2477 easement, as mapped by ADNR, starts east of Boretide Road and gradually merges with it. No trail currently exists within this easement. The RS 2477 route technically provides for public access from the highway corridor (including the Indian to Girdwood Bike Path [Map ID 70]) to CSP’s Indian Valley Trail, which is a historic Iditarod Trail segment that is in use as a recreation trail. For this Project, the RS 2477 easement where it occurs within the Project corridor is considered a Section 4(f) resource as a historic property but not as a park property. See Sections 3.2.3 and 4.6 for further information.	Mixed	Not applicable See Sections 3.2.3 and 4.6	No (see Notes column).

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
72	Indian Creek Trailhead	102.9 (W)	Trailhead and Parking	This is a group of recreational facilities on the intersecting DOT&PF and ARRC ROWs and CSP lands. DPOR manages the facilities, which include a baseball field (Boulder Ballfield), latrines, trash cans, parking, a scenic overlook, and the northernmost public access to the paved Indian to Girdwood Bike Path (Map ID 70). Vehicle access to the parking lot is typically closed and gated during winter. The CSPMP lists this site as a CSP facility.	ADNR/DOT&PF/ARRC	A; Connected to CSP	Yes
73	Bird Ridge Trailhead	102.1 (M)	Trailhead	The entire parking area is adjacent to but just outside the DOT&PF ROW. Bird Ridge Trail and this trailhead are popular CSP features. The CSPMP lists this trailhead as a CSP facility.	CSP	Park	Yes
74	Bird Creek Access Parking	101.6 (M)	Parking/Trailhead	Bird Creek Access Parking is a large, paved parking lot with latrines and a high rock-cut perimeter. A trail departing the northern end lies partly within the highway ROW and provides alternate access to Bird Ridge Trail, a latrine for that trail, and a scenic overlook. A trail departing the southern end begins within the DOT&PF ROW. It includes an interpretive sign/shelter, provides access to rock climbing/ bouldering immediately adjacent to the ROW, provides access to a trail that follows the western bank of Bird Creek, connects to the pedestrian bridge that crosses Bird Creek adjacent to the highway, and leads to other pedestrian facilities and sport fishing. The parking lot is within CSP. The driveway and pedestrian trails at each end are within the DOT&PF ROW. The CSPMP lists this site as a CSP facility.	CSP/DOT&PF	Trails: A; Connected to CSP; Parking and latrine: Park	Yes
75	Bird Creek Boulders	101.5 (M)	Rock Climbing	This feature is boulders set on the bluff between the parking lot and creek. Access includes stairs that may be within the DOT&PF ROW. Rock climbing appears to be fully within CSP.	CSP	Park	Yes
76	Bird Creek Observation Platforms and Trail Connections	101.4 (M)	Viewing decks/scenic overlooks, connections to trails	The platforms adjacent to Bird Creek provide a vantage to view the creek and fishing activity, and provide handicap-accessible fishing at high tide. The feature connects to the pedestrian bridge and pedestrian undercrossing of the highway, and the Indian to Girdwood Bike Path (Map ID 70) on the water side. The feature also connects the platforms to the Bird Creek overflow parking with a trail within the DOT&PF/ARRC ROW.	DOT&PF/ARRC	A; Connected to CSP	Yes

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Map ID <sup>a</sup>	Name	MP <sup>b</sup>	Type	Notes	Ownership	Section 4(f) Considerations	Section 4(f) Applicability
77	Bird Creek Overflow Campground	101.3 (M)	Campground	The upper parking lot is rimmed with 40 designated RV campsites, fire rings, 20 picnic tables, water, and latrines. During summer, a volunteer campground host offers assistance and answers questions. The campground is within the MOA Bird Creek Regional Park, which DPOR manages as part of CSP through an agreement. An overnight camping fee is assessed at the campground. The CSPMP lists this site as a CSP facility.	MOA/CSP	Park	Yes
78	Bird Creek Overflow Parking	101.3 (M)	Parking	This driveway connection from the Seward Highway leads to a CSP-managed parking facility within the DOT&PF ROW. It provides parking for fishing/recreating at Bird Creek. On the northern side, a 65- by 35-foot area offers paved and handicap-accessible parking. On the southern side of the driveway is a 250- by 40-foot gravel parking area with a fee station. The CSPMP lists this site as a CSP facility.	DOT&PF	A; Connected to CSP	Yes
79	Bird Creek Campground	100.7 (W)	Campground	This campground has 23 wooded camping sites open to tents or vehicles and two reservable public use cabins. The campground has a water pump, fire rings, picnic tables, outhouses, and bear-safe food lockers. A summer-season campground host offers assistance and answers questions. The CSPMP lists this site as a CSP facility.	CSP	Park	Yes
80	Bird Creek Trailhead	100.7 (W)	Trailhead	The trailhead for the Indian to Girdwood Bike Path (Map ID 70) is accessed from the highway at the same driveway as the Bird Creek Campground (Map ID 80). Both the trailhead and campground have multiple trail connections to the Indian to Girdwood Bike Path (Map ID 70). The trailhead is open year-round, and CSP grooms part of the trail within this area for cross-country skiing. The CSPMP lists this site as a CSP facility.	CSP	Park	Yes
81	Community Trail Connection	100.5	Trail and Parking	The undercrossing at a creek culvert and trail spur connects the community of Bird with the Indian to Girdwood Bike Path (Map ID 70). The trail spur ends at a small parking lot within the DOT&PF ROW (CSPMP refers to it as Little Penguin Creek Rest Stop), developed as formal access to the trail. The CSPMP lists this site as a CSP facility.	DOT&PF	A; Connected to CSP	Yes

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82	Avalanche Gate Pullout	99.9 (W)	Pullout	This is a large, paved pullout and parking on the northern side of the highway avalanche gate, approximately 350 by 30 feet beyond the shoulder. The Indian to Girdwood Bike Path (Map ID 70) follows the outside edge of the pullout along the majority of its length. Per CSP, the pullout is not officially advertised as a recreation access point and is not especially important for CSP purposes.	DOT&PF	D; Multi-purpose/not connected	No
83	Scenic Pullout	99.3 (W)	Pullout	This is a large pullout with a 300- by 25-foot paved area beyond the shoulder. This is a multi-use pullout not built for access to the Indian to Girdwood Bike Path (Map ID 70).	DOT&PF	D; Multi-purpose/not connected	No
84	Pathway Access	99.3 (W)	Trail	This trail spur at the southern end of the MP 99.3 Scenic Pullout (Map ID 83) traverses downslope to the Indian to Girdwood Bike Path (Map ID 70). It is used by the public for access, and by CSP for management and maintenance of the trail. The trail spur is part of the trail system.	DOT&PF	A	Yes
85	Bird Flats Scenic Overlook	99.1 (W)	Pullout	This is a pullout for the Alaska Railroad Worker Memorial. It is paved, with two driveways. It provides informal access to the Indian to Girdwood Bike Path (Map ID 70) and scenic viewing opportunities. DOT&PF and ARRC erected the monument.	DOT&PF	D; Multi-purpose/not connected	No

Note: AHRS = Alaska Heritage Resources Survey; ID = identification number; RS = Revised Statute; RV = recreational vehicle

<sup>a</sup> Map ID numbers are a continuation from Table 2-1 and correspond with the numbering used in Appendix A Mapbook.

<sup>b</sup> (M) signifies that the facility is on the mountain side of the Seward Highway; (W) signifies that the facility is on the water (Turnagain Arm) side of the Seward Highway.

### 3.2.3 Iditarod Trail Segments within Chugach State Park

Congress designated the Iditarod National Historic Trail (INHT). However, only those portions determined NRHP eligible would qualify for Section 4(f) protection as historic sites, and only those portions that exist as recreational trails would qualify for Section 4(f) protection as stand-alone Section 4(f) recreation areas. Portions of the trail system that exist on park, recreation area, or wildlife refuge lands are also protected by virtue of the underlying protected property. Within the Turnagain Arm Planning Unit of CSP, three named segments of the INHT occur and have been given Alaska Heritage Resource Survey (AHRS) numbers: the Girdwood-Ship Creek Trail (SEW-00257), the Indian Valley Trail (SEW-00143; a segment of the Girdwood-Ship Creek Trail), and the Potter Connecting Trail (ANC-00279). Each of these trails is evaluated as a historic site in Chapter 4. Each could also be a recreational trail associated with the park.

### 3.3 Relationship to Other Similar Lands within the Vicinity

Abutting CSP at the northern side of the Turnagain Arm Planning Unit is the ACWR and Potter Marsh, which offer public access to wildlife, wildlife habitat viewing, and education. Near where the Seward Highway reaches Girdwood (MP 90), CSP abuts Chugach National Forest, which has large expanses of backcountry trails and natural areas. Chugach National Forest lands are also across Turnagain Arm southward from the park.

CSP manages several areas within the Project corridor not under their ownership. ARRC issued a permit to CSP to manage and operate the Potter Section House as well as its interpretive and parking area. Bird Creek Regional Park is a MOA-owned park and recreation land that is adjacent to and within CSP lands, and DPOR manages it by agreement as part of CSP. MOA lands between designated sections of CSP near the community of Bird also include a segment of the Indian to Girdwood Bike Path. ADNR-DPOR manages the pathway by agreement as part of CSP.

### 3.4 Management Agreements

Numerous land management and easement agreements occur among CSP, DOT&PF, ARRC, and MOA regarding the operations and activities of each entity within areas of overlapping ROW interests. Table 3-3 provides selected pertinent examples, which were used to help determine whether the agencies meant to acknowledge facilities as park facilities within the ROW or, in some cases, there was intent to exclude some features from Section 4(f) applicability.

**Table 3-3. Selected management agreements for park features within the Seward Highway right-of-way.**

Agreement Type	Area	Agencies	Management Objective/Purpose
Interagency Land Management Agreement	Rainbow Valley	DPOR, DMLW	The site will be managed as part of CSP by DPOR though an agreement with DMLW (ADL 231719, ADL 231354).
MOU	Potter Section House	DPOR, ARRC, Anchorage Historic Preservation Commission	DPOR accepts ownership of the Potter Section House and agrees to maintain the house in accordance with the recommended procedures in <i>The Secretary of the Interior's Standards for Historic Preservation Projects with Guidelines for Applying the Standards</i> .

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Agreement Type	Area	Agencies	Management Objective/Purpose
Land Lease	Potter Section House Historical Site	DPOR, ARRC	The site is leased to DPOR for public parking area and visitor facilities, historical interpretive kiosk panels, and display rail cars within the ARRC ROW (ARRC Contract No. 5775; updated 2022, expires in 2032).
Land Use Permit	Indian Trailhead & Community Ballfield	DPOR, ARRC	DPOR was issued a permit to use and maintain the site (Boulder Stadium), and construct and reconstruct park facilities within the ARRC MP 88 ROW vicinity (Seward Highway MP 103).
Land Use Permit	Bird Creek Parking, Scenic Overlook, & Pedestrian Access	DPOR, ARRC	DPOR was issued a permit to operate and maintain the site, and construct and reconstruct park facilities within the ARRC MP 86.6 ROW vicinity (Seward Highway MP 101.5).
Maintenance Certification	Bird Creek Parking, Scenic Overlook, & Pedestrian Access	DPOR, DOT&PF	DPOR agrees to perform all maintenance and management of site and park facilities within the transportation ROW (DOT&PF Project No. SB-AK-93-01/50940).
Maintenance Agreement	Bird Creek Campground	DPOR, DOT&PF	DPOR agrees to maintain and operate federally funded park amenities and facility improvements consistent with applicable portions of 23 CFR 1.27 and the <i>Alaska Highway Maintenance and Operations Manual</i> .
Memorandum of Agreement	Little Penguin Creek Rest Stop, Seward Highway	DPOR, DOT&PF	DPOR accepts management of the site and related park facilities within the transportation ROW (DOT&PF Project No 54433; likely no longer active as DOT&PF removed the parking).
MOU	Seward Highway Easement and Recreation Facilities, Potter Marsh to Girdwood	DPOR, DOT&PF	This MOU outlines a plan to fix the location of transportation ROWs through CSP and encourage cooperation between agencies in planning, design, construction, maintenance, and operation of facilities along the transportation ROW. It identifies that DOT&PF would relinquish any previously included ROW back to the park if it is outside the new ROW (original MOU 1990, Amendment 1 signed in 1993 extends agreement indefinitely). The CSPMP identifies the need to update the agreement as it lacks clarity to the extent of maintenance responsibilities.
Memorandum of Agreement	Seward Highway Corridor, Potter Station to Girdwood	DPOR, ARRC, DOT&PF	This agreement fosters cooperation between agencies for the multi-phased highway improvement project and in the overall planning, development, operation, and maintenance of the Seward Highway and railroad corridors within and adjoining CSP in a manner compatible with the scenic and recreational values of the corridor. DOT&PF agrees to construct and maintain pullouts such as snow removal, and maintenance of asphalt surfaces and other facilities installed by them such as guardrails and culverts (expired in 2021).
Management Agreement	Bird Creek Regional Park	DPOR, MOA	This agreement delegates interim management authority to DPOR to manage, as part of CSP, lands in Bird Creek owned by MOA (079855).
Cooperative Agreement	Iditarod National Historic Trail	ADNR, ADF&G, ARRC, DOT&PF, DOI	ADNR, as the result of the comprehensive management plan, agrees to designate, include, and develop segments of the trail on state land as part of the National Trail System.
Permit	Potter Section House Latrines	DPOR, DOT&PF	This permit is for the construction and operation of the latrines within the DOT&PF ROW adjacent to the Potter Section House/CSP Headquarters parking area.
Management Agreement	Indian to Girdwood Bike Path	DPOR, MOA Heritage Land Bank	This agreement delegates management authority to DPOR for the maintenance and management of the segment of the National Recreation Trail located on MOA land in Bird to consolidate management of the highly used recreational facility under one agency.
Permit	Seward Highway Corridor	DOT&PF, ARRC	DOT&PF and ARRC agreed on highway use of the ARRC corridor in various locations within Southcentral Alaska (Blanket Permit dated April 7, 1989, ARRC Contract No. 6012).

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Agreement Type	Area	Agencies	Management Objective/Purpose
Identified Need: Cooperative Agreement Amendment	Seward Highway Corridor	ADNR, DOT&PF	Both DPOR and DOT&PF have stated there is a need to amend the 1994 Cooperative Management Agreement between ADNR and DOT&PF to provide clarity on management and maintenance responsibilities within the Seward Highway corridor.

Notes: ADL = Alaska Division of Land; DMLW = Division of Mining, Land, and Water; DOI = U.S. Department of the Interior

### 3.4.1 Heritage Land Bank

Heritage Land Bank is a division of the MOA Real Estate Department. The Heritage Land Bank division manages uncommitted, municipally owned land in the Heritage Land Bank inventory and the Heritage Land Bank Fund in a manner designed to benefit the present and future citizens of Anchorage, promote orderly development, and achieve the goals of the Comprehensive Plan. The Heritage Land Bank land base currently consists of approximately 10,000 acres distributed between Chugiak and Girdwood (MOA 2025).

Portions of the Indian to Girdwood Bike Path pathway are located on MOA Heritage Land Bank land (near MP 100) and are managed by CSP through a management agreement, described above.

### 3.5 Unusual Characteristics

The CSP’s founding legislation (AS 41.21.121) declares “all state-owned land” within the park boundaries to be part of the park. All state-owned land, taken literally, would include the ARRC and DOT&PF transportation ROWs. However, the transportation agencies and CSP have considered both ROWs to be separate for most purposes, with interagency agreements (see Table 3-3 in Section 3.4) that acknowledge and allow for park facilities within the ROWs. No legal document exists that comprehensively establishes the ownership and management authorities within this corridor. For this Project, and this document, DOT&PF is making a good-faith effort to describe park features, including some for which there is no agreement, and making a reasonable judgment in coordination with the OWJ about which of the features within the ROW are protected by Section 4(f).

### 3.6 Section 4(f) Applicability

CSP is a designated park that is publicly owned, generally open to the public, and presumed significant per 23 CFR 774.11(c) and based on past DOT&PF projects that have found it to be a Section 4(f) property. Therefore, it qualifies for Section 4(f) protection. Significant facilities within the transportation ROW that provide park functions and access also qualify for Section 4(f) protection (see Section 3.2). Where a park trail enters the DOT&PF highway ROW, the trail continues to qualify for Section 4(f) protection. This includes the Turnagain Arm Trail, Indian to Girdwood Bike Path, Falls Creek Trail, and Indianhouse Mountain Trail. DOT&PF has determined that 50 feet is a reasonable land width for these trails (25 feet from trail centerline). Also, the southern end of the Indian Valley Trail, which is documented in Section 3.2.3, is a protected 100-foot-wide trail easement. Certain trailheads, pullouts, and climbing areas that occur within or partly within the ROW are also protected under Section 4(f) as described in Section 3.2.2 and Table 3-2 in that section.

CSP-managed lands encompassing the leased and permitted areas around the Potter Section House Historic Site (the section house as CSP headquarters, its historic outbuildings, the rotary snowplow locomotive on display, interpretive kiosks, vault toilets, landscaping, and public parking) have been under long-term lease for public park uses for nearly 40 years and are significant to the park. Therefore, DOT&PF considers the leased and permitted areas to be part of the greater CSP and subject to Section 4(f) protections. Similarly, CSP-managed lands of Bird Creek Regional Park are considered functionally part of CSP and also qualify for Section 4(f) protections.

## 4 Historic Sites

Many historic sites are within the Project corridor. Historic sites of significance—those that are listed or have been found eligible for listing in the NRHP—are subject to protection under Section 4(f). EA Appendix Q Section 106 Consultation/Findings contain multiple desktop and field survey reports and SHPO consultation; they are collectively referred to herein as the “cultural reports.” The cultural reports list multiple sites that are eligible for NRHP listing and qualify for Section 4(f) protection. This document provides information for properties listed in the NRHP, determined eligible for listing in the NRHP, “assumed eligible” for the NRHP, recommended as eligible by DOT&PF, or otherwise warranting discussion for applicability of Section 4(f). Much of the information herein is summarized from the cultural reports, but additional detail is provided where warranted. The cultural reports do not typically address the legal land parcel or land area associated with a historic property. FHWA’s Section 4(f) guidance indicates that the land area must be determined through the Section 106 process. This document suggests specific boundaries that are consistent with the cultural report information, but the boundaries have not been reviewed or concurred with by the SHPO.

The historic sites within the Project corridor are:

- Potter Section House State Historic Site (ANC-00075; Map ID 10/HS-1)
- Potter Connecting Trail (Iditarod National Historic Trail; ANC-00279/SEW-00566)
- Turnagain Arm District, Alaska Railroad (ANC-04057/SEW-01613)
- Prehistoric Archaeological Site ANC-00054
- Prehistoric Archaeological Site ANC-00078
- Indian Valley Trail (Iditarod National Historic Trail; SEW-00143; Map ID 71/HS-2)
- Girdwood-Ship Creek Trail (Iditarod National Historic Trail; SEW-00257)
- Indian Valley Mine (SEW-00412; Map ID HS-3)
- Diamond Jim’s Sign (SEW-01379; Map ID HS-4)
- Garage, Storage Shed, and Residence (SEW-01567; Map ID HS-5)
- Alaska Railroad Bridge Railroad Mile 86.6 (SEW-01626)

These sites are discussed further in the following subsections.

### 4.1 Potter Section House State Historic Site

**Location and Map Reference:** Potter Section House is located at Seward Highway MP 115 at the southern end of Potter Marsh; see Appendix A Mapbook, page 2 (Map ID 10/HS-1).

**Section 4(f) Property Type:** Potter Section House (ANC-00075) is a historic property that is listed in the NRHP. It is the last railroad section house in existence along the Alaska Railroad. It was nominated for listing in the NRHP under Criterion A for its association with the Alaska Railroad, according to the cultural reports (Hosken et al. 2024). It is also associated with the INHT. The building is a 1.5-story structure of wood-frame construction built in 1929, and it has been restored and preserved. The site is open to the public and is immediately off the western side of the Seward Highway. No public access is currently available for historical interpretation of the Potter Section House interior; however, the main room includes limited interpretive

material. CSP uses Potter Section House as its headquarters, and it is open to the public as a state office. The historic site and adjacent associated interpretive area (Potter Locomotive Interpretive Area) are managed together as a day-use area for park visitors.

**Size/Boundary:** Boundaries are typically proposed as part of the NRHP nomination; however, only a general description is provided in the 1985 Potter Section House nomination form. This Project's Section 106 process has not proposed boundaries for the historic site. A boundary was estimated based on the nomination's narrative description, which identifies an area of less than 1 acre as well as describes the house and outbuildings as being located between the highway ROW and shoreline. Appendix A Mapbook, page 2 (Map ID 10) shows a 0.25-acre area encompassing the physical buildings. This site is also considered part of CSP, but the park site polygon differs in size and shape from the historic site polygon. See also Section 3.2.2 and Table 3-2 in that section.

**Section 4(f) Applicability:** Because the Potter Section House State Historic Site is listed in the NRHP, it qualifies for Section 4(f) protection as a historic site. It also qualifies for Section 4(f) protection as part of CSP, a significant publicly owned park land that is open to the public (see also Section 3.6).

## 4.2 Potter Connecting Trail (Iditarod National Historic Trail)

**Location and Map Reference:** The trail's historical extent was from Indian to Potter Creek within the Project area, then northward to the original Anchorage townsite; see Appendix A Mapbook, pages 2 through 8 (no map ID).

**Section 4(f) Property Type:** This "connecting trail" (ANC-00279/SEW-00566), which is part of the INHT system, is a historic site. CSP's existing Turnagain Arm Trail, managed as a recreational hiking trail between Potter Creek and Windy Corner, appears to follow the historical route. The recreational trail includes markers indicating it is part of the INHT. Beyond the 9 miles of maintained trail, unmaintained segments of the historical trail cut are known to exist between Windy Corner and Indian. This Project's Section 106 process included a literature review regarding the Turnagain Arm Trail and determined that, "while the historic significance of the Iditarod Trail system has been determined, the lack of physical remains of the connecting trail segments...render these segments incapable of conveying that significance" (Hosken et al. 2024).

**Size/Boundary:** The trail historically ran approximately 20 miles from Indian to Anchorage (14 miles within the Project area). This Project's Section 106 process has not described a trail width. The original trail tread appears to have averaged 10 feet wide or wider, based on historical photographs as well as rock cuts and benched areas currently visible.

**Section 4(f) Applicability:** This Project's Section 106 process did not definitively locate the Potter Connecting Trail during field investigations. Project cultural resources specialists determined through a literature review that while portions of the historical trail still exist as the Turnagain Arm Trail, they do not retain sufficient integrity to convey the significance of the Iditarod Trail. DOT&PF does not consider the extant trail segments to be NRHP eligible; therefore, the Potter Connecting Trail is not subject to Section 4(f) protection as a historic site.

The Turnagain Arm Trail, as a recreational feature of CSP, is protected under Section 4(f) as a park property; see Section 3.2.2 and Table 3-2 in that section.

### **4.3 Turnagain Arm District, Alaska Railroad**

**Location and Map Reference:** Within the Project area, the Turnagain Arm District of the Alaska Railroad runs from Seward Highway MPs 98.5 to 118 (the entire length of the Project corridor). It is commonly identified with Alaska Railroad MPs 83 to 103; see Appendix A Mapbook, pages 1 through 10 (ARRC track shown on maps; no Map ID for the district).

**Section 4(f) Property Type:** The Alaska Railroad (ANC-04057/SEW-01613) is a Section 4(f) historic site and historic district. These AHRS numbers refer to the segment of the Alaska Railroad that runs from Portage to Potter, which is known as the Turnagain District of the Alaska Railroad. The cultural reports indicate that the Turnagain Arm District of the Railroad (36.6 miles) was determined eligible for listing in the NRHP under Criterion A for its demonstrable association with Transportation, Economic Development, and Settlement. Features include the Alaska Railroad mainline track and roadbed as well as occasional sidings and associated signals, signs, communications equipment, and maintenance areas. Activities are principally railroad passenger, freight, and maintenance operations. From a passenger point of view, the route is scenically attractive, with a curvilinear route hugging the shoreline of Turnagain Arm at the base of tall mountains, principally on the historical alignment.

**Size/Boundary:** The cultural reports do not delineate property boundaries, so an exact acreage is not known. The Turnagain Arm District of the Alaska Railroad is a railroad track 36.6 miles long. The ARRC ROW is typically 200 feet wide but is wider in some locations. The Alaska Railroad mainline runs from Seward in the south to Fairbanks in the north, approximately 470 miles. The Project area encompasses approximately 4 percent of the overall route.

**Section 4(f) Applicability:** The railroad historic district qualifies for Section 4(f) protection as a historic property that is NRHP eligible. However, the use of historic transportation facilities, including the “improvement of railroad or rail transit lines that are in use or were historically used for the transportation of goods or passengers, including but not limited to, maintenance, preservation, rehabilitation, operation, modernization, reconstruction and replacement of railroad or rail transit line elements” is an exception (with a few caveats) to the requirement for Section 4(f) applicability. DOT&PF could pursue this exception (23 CFR 774.13(a)) if effects to the site would occur.

### **4.4 Prehistoric Archaeological Site ANC-00054**

**Location and Map Reference:** The site location is not disclosed herein to protect a potentially sensitive site. The cultural reports indicate location.

**Section 4(f) Property Type:** This prehistoric archaeological site (ANC-00054) is a Section 4(f) historic site that is listed in the NRHP under Criterion D for its potential to yield information on the prehistory of Upper Cook Inlet. This is a multicomponent archaeological site located on a rocky outcrop; lithic, organic, and other remains indicate use of this site by different cultures dating to 6,500 years ago, making ANC-00054 the oldest known site within the region. The site

has produced core and blade material, chipped stone points, and other stone tool artifacts, according to the cultural reports (Hosken et al. 2024).

**Size/Boundary:** The cultural reports do not delineate site boundaries, but the site is thought to encompass a fraction of 1 acre.

**Section 4(f) Applicability:** The archaeological site designated ANC-00054 qualifies for Section 4(f) protection as a historic site that is listed in the NRHP. However, as the site is listed under Criterion D for its potential to yield information about local prehistory, an exception to the need for Section 4(f) approval is provided in FHWA regulations (23 CFR 774.13(b), and DOT&PF could pursue this exception if effects to the site would occur.

## 4.5 Prehistoric Archaeological Site ANC-00078

**Location and Map Reference:** The site location is not disclosed herein to protect a potentially sensitive site. The cultural reports indicate location.

**Section 4(f) Property Type:** This prehistoric archaeological site (ANC-00078) is a Section 4(f) historic site that is listed in the NRHP under Criterion D for its potential to yield information about the prehistory of Turnagain Arm. This site is known to contain buried prehistoric remains of human activity. While other prehistoric archaeological sites occur within the Southcentral Alaska region, this site is among the oldest archaeological sites known within the region.

**Size/Boundary:** The cultural reports do not delineate site boundaries, but the site is thought to encompass a fraction of 1 acre.

**Section 4(f) Applicability:** This archaeological site qualifies for Section 4(f) protection as a historic site that is listed in the NRHP. However, as the site is listed under Criterion D for its potential to yield information about local prehistory, an exception to the need for Section 4(f) approval is provided in FHWA regulations (23 CFR 774.13(b), and DOT&PF could pursue this exception if effects to the site would occur.

## 4.6 Indian Valley Trail (Iditarod National Historic Trail)

**Location and Map Reference:** The historical trail ran from approximately Seward Highway MP 103 (current), up Indian Creek to Indian Pass, then down Ship Creek to the lowlands near Knik Arm. The State of Alaska holds a Revised Statute (RS) 2477 public access easement for the trail (Revised Statute Trail 111) and maps the easement as beginning between Boretide and Old Johns Roads at the Seward Highway. Refer to Appendix A Mapbook, page 8 (Map ID 71/HS-2). CSP manages a portion of the trail for recreational hiking, with a trailhead located approximately 1 mile north of the Seward Highway at the terminus of Boretide Road and the upper end located at Indian Creek Pass. The portion of the trail managed for recreation is well outside the Project's Area of Potential Effects (APE).

**Section 4(f) Property Type:** The Indian Valley Trail (SEW-00143) is a historic property, determined eligible for listing in the NRHP under Criterion A for its association with the Iditarod Trail. This determination of NRHP eligibility from 1999 was reaffirmed in 2005. The trail was established by at least 1907, reportedly as a safer or easier winter passage through the

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Chugach Mountains from Turnagain Arm to Knik Arm (compared to the Crow Pass Trail). The Iditarod Trail continued on to the Iditarod Mining District and Nome, and provided winter access for mail, mining, and other purposes. Project cultural resource specialists did not find physical remnants of the portion of the route connecting to the Seward Highway alignment during field surveys for this Project. However, a public access easement associated with the trail connects with the Seward Highway at Indian (approximately MP 103.1).

**Size/Boundary:** This Project's Section 106 process has not recommended a boundary for the trail. As an RS 2477 easement, the State of Alaska (ADNR) recognizes it having a 100-foot width. The Indian Pass Trail, as mapped by ADNR, is approximately 21 miles long. The SEW-00143 segment of the trail, located within the Seward quadrangle on U.S. Geological Survey maps, is approximately 1 mile long and continues as ANC-00281 within the Anchorage quadrangle (AHRs numbering is based on the quadrangle names). The trail runs from the lowlands at the edge of Turnagain Arm to Indian Pass, and down Ship Creek to the lowlands on Joint Base Elmendorf-Richardson. The *Iditarod National Historic Trail Seward to Nome: A Comprehensive Management Plan* (BLM 1986) recommends that a trail corridor 1,000 feet wide be established for the trail, but it does not appear that any further protection has been applied, likely because the trail is mostly encompassed within CSP, which is already protected. Within the APE for this Project, the 100-foot-wide RS 2477 easement is the best approximation of a land area for the trail. The location for the trail at its southern end/intersection with the Seward Highway could change because no known trail remnant is near the intersection, and the location of the RS 2477 easement appears to be "floating" in anticipation of potential future legal demarcation (i.e., survey).

**Section 4(f) Applicability:** Because the Indian Valley Trail has been determined NRHP eligible, it is protected under Section 4(f) as a historic site. However, within the APE, there is no known trail remnant. While a RS 2477 easement exists for the trail and connects the highway to the start of the recreational trail, no physical trail exists within the 1-mile area between the highway and trailhead. Therefore, the RS 2477 easement within the APE is not under consideration as a Section 4(f) resource for its connection to the Indian Valley recreational trail (beyond the APE).

## **4.7 Girdwood-Ship Creek Trail (Iditarod National Historic Trail)**

**Location and Map Reference:** The Girdwood-Ship Creek Trail's historical extent was from Girdwood to Indian, overlapping the Project area, then proceeding northward through Indian Creek Pass and down Ship Creek to the lowlands near Knik Arm; see Appendix A Mapbook, pages 8 through 10 for the portion within the Project area (not identified on maps; no Map ID).

**Section 4(f) Property Type:** The "connecting trail" (SEW-00257), which is part of the INHT system designated by Congress, is a historic site. However, no known extant segment of this trail exists along Turnagain Arm; the Alaska Railroad and Seward Highway might have overlain any remnant of the trail parallel to the shoreline. The trail within the Project corridor extended to Ship Creek via Indian Creek Pass (see Indian Valley Trail, Section 4.6). Several interwoven routes of what is now known as the INHT system ran from Seward around the head of Knik Arm, then across the Alaska Range to the Iditarod Mining District, and on to Nome on Alaska's northwestern coast, covering well over 2,000 miles. The Indian to Girdwood Bike Path closely parallels the route and provides access to a trail within the corridor.

**Size/Boundary:** The Girdwood-Ship Creek Trail historically traversed approximately 13 miles from Girdwood to Indian (4.5 miles within the Project area), then continued an additional approximately 25 miles over Indian Pass to the lowlands near Knik Arm. This Project's Section 106 process has not described a trail width, because the Alaska Railroad and Seward Highway might have overlain the trail. No known visible remnant of the trail exists along Turnagain Arm; see also discussion of the Indian Valley Trail segment in Section 4.6.

**Section 4(f) Applicability:** The National Trails System Act (Public Law 90-543) specifically exempts lands associated with National Historic Trails from "the provisions of Section 4(f)" unless those lands or associated sites are found NRHP eligible. This Project's Section 106 process did not locate the Girdwood-Ship Creek Trail during field investigations. Project cultural resources specialists determined that, while portions of the historical trail still exist away from the highway, they do not retain sufficient integrity to convey the historical significance of the Iditarod Trail. DOT&PF does not consider any extant trail segment that may exist parallel to the highway to be NRHP eligible; therefore, the Girdwood-Ship Creek Trail is not subject to Section 4(f) protection as a historic site. However, the Indian Valley Trail segment of the Girdwood-Ship Creek Trail, which runs perpendicular away from the Seward Highway, is subject to Section 4(f) protection, as noted in Section 4.6.

## 4.8 Indian Valley Mine

**Location and Map Reference:** Indian Valley Mine is located at Seward Highway MP 104; see Appendix A Mapbook, page 8 (Map ID HS-3).

**Section 4(f) Property Type:** The mine (SEW-00412) is a historic site; it is a mine site with associated buildings listed in the NRHP under Criterion A for association with mining activities along Turnagain Arm after the Alaska Gold Rush era. The cultural reports indicate that a log cabin, a log assay office, a gully to bring water to the site, and a re-opened mine shaft are the contributing resources and other features of the site are non-contributing. The property is privately owned, and the owners operate it as a roadside attraction that is open to the public.

**Size/Boundary:** The cultural reports do not describe a specific land area for the historic site. The size of the municipal private parcel that contains the mine and is operated as a tourist attraction is 4.1 acres.

**Section 4(f) Applicability:** The historic site qualifies for Section 4(f) protection as a historic site that is listed in the NRHP.

## 4.9 Diamond Jim's Sign

**Location and Map Reference:** The Diamond Jim's Sign is located near Seward Highway MP 103; see Appendix A Mapbook, page 8 (Map ID HS-4).

**Section 4(f) Property Type:** The sign (SEW-01379) is a historic site consisting of a neon sign for a former commercial establishment. The sign has been determined eligible for listing in the NRHP under Criterion A for its association with the development of trade, commerce, and tourism along the Seward Highway, and is associated with the 1964 Good Friday Earthquake

and subsequent recovery. It is readily visible to motorists on the highway but does not appear to be managed as an attraction.

**Size/Boundary:** The cultural reports do not describe a land area associated with the Diamond Jim's Sign but state that only the sign itself is eligible for listing in the NRHP. The sign itself occurs within the Seward Highway ROW.

**Section 4(f) Applicability:** The historic site qualifies for Section 4(f) protection as a historic site that is NRHP eligible.

## **4.10 Garage, Storage Shed, and Residence**

**Location and Map Reference:** This property is located at 29025 Seward Highway, at approximately MP 102.9 in the community of Indian. See Appendix A, page 8 (Map ID HS-5).

**Section 4(f) Property Type:** The property (SEW-01567) is a historic site. Its garage and residence structures date from 1965 and 1968, and are associated with the 1964 Good Friday Earthquake and subsequent recovery. DOT&PF recommended these structures as NRHP eligible under a former project. The site's eligibility is noted as pending by the Alaska Office of History and Archaeology AHRS database. It is not anticipated that a decision will be obtained as part of this Project; therefore, it is assumed eligible for this Project.

**Size/Boundary:** The draft cultural reports do not indicate a land area associated with the site but recommends that a polygon be established to incorporate the three structures. For the purposes of the *Individual Section 4(f) Evaluation* associated with this Project, the boundary is assumed to be the entirety of the residential property as well as additional frontage that encompasses the encroachment of the garage structure into the DOT&PF ROW, encompassing approximately 2.1 acres.

**Section 4(f) Applicability:** Because DOT&PF considers this historic site to be NRHP eligible, the site qualifies for Section 4(f) protection.

## **4.11 Alaska Railroad Bridge Railroad MP 86.6**

**Location and Map Reference:** This historic bridge occurred at Alaska Railroad MP 86.6, at Bird Creek, or Seward Highway MP 101.5; see Appendix A Mapbook, page 9 (not identified on map; no Map ID).

**Section 4(f) Property Type:** The bridge (SEW-01626) was a historic site that was "assumed eligible" for the NRHP. The property was a pony-truss-type railroad bridge. This specific bridge did not have an individual determination of NRHP eligibility but was "assumed eligible" under a 2017 Memorandum of Agreement between the Alaska Office of History and Archaeology and Federal Transit Administration. The agreement addressed mitigation for effects to all such pony-truss bridges in Alaska belonging to the ARRC, and ARRC has already accomplished the mitigation. ARRC replaced this bridge in spring 2025, and the new bridge does not qualify for NRHP status

**Size/Boundary:** Not applicable.

**Section 4(f) Applicability:** DOT&PF believes the historic bridge qualified for Section 4(f) protection as a historic site because it was assumed NRHP eligible, per the 2017 Memorandum of Agreement discussed above. However, the replacement bridge is not historic and does not qualify for Section 4(f) protection.

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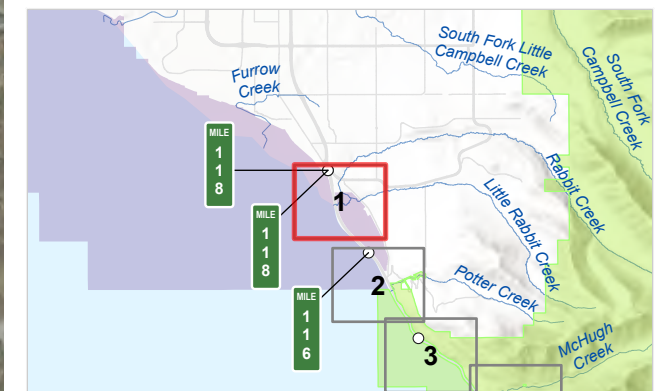
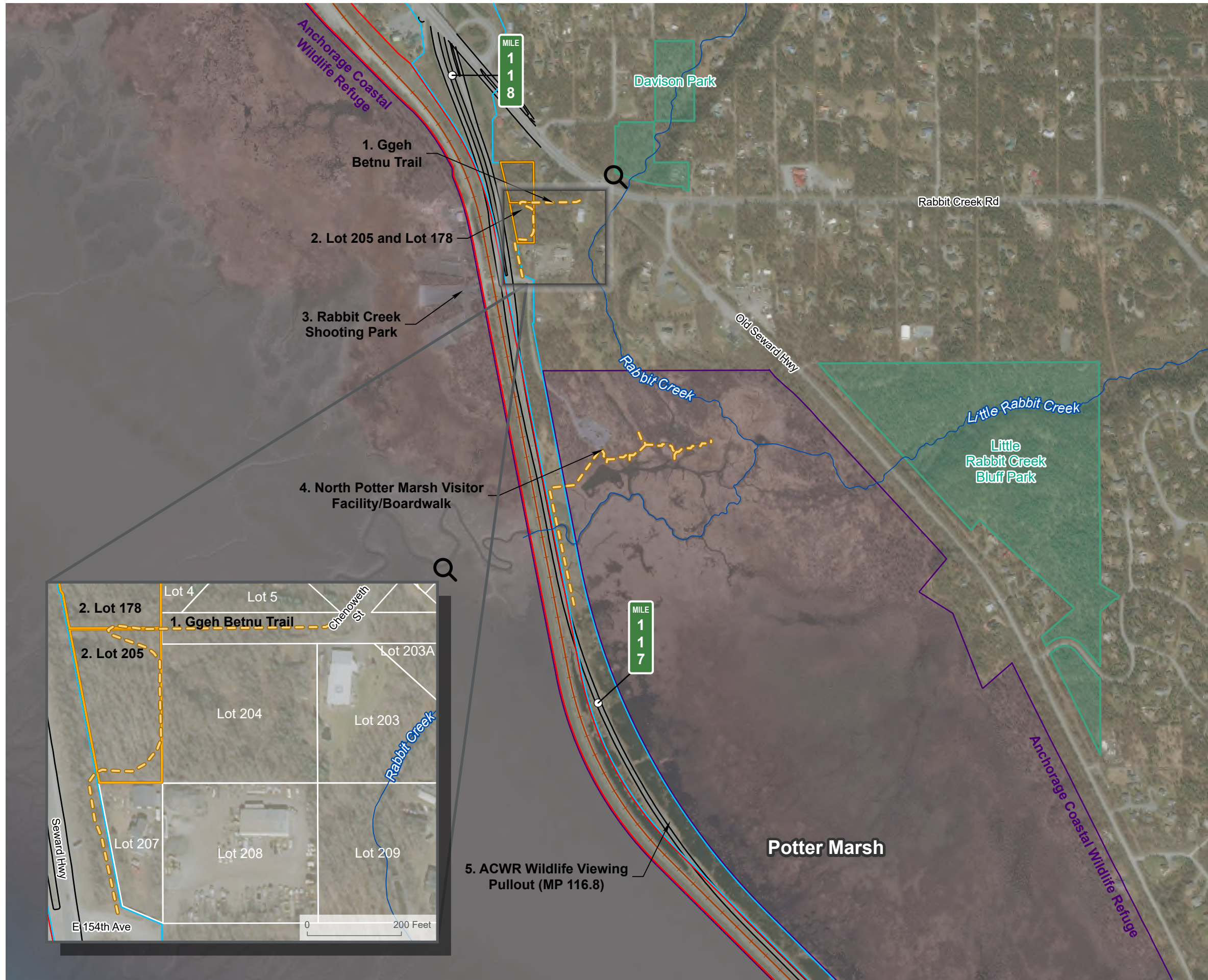
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## **Appendix A. Mapbook**

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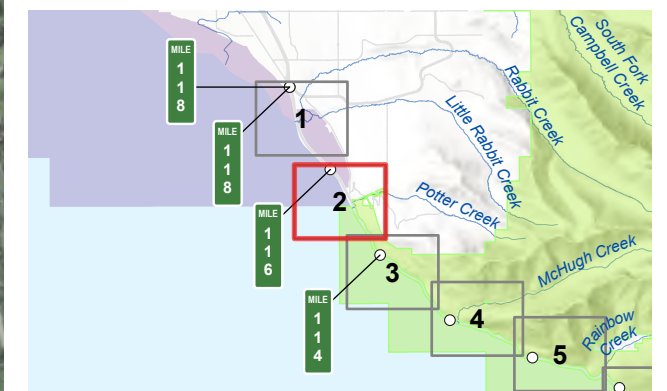
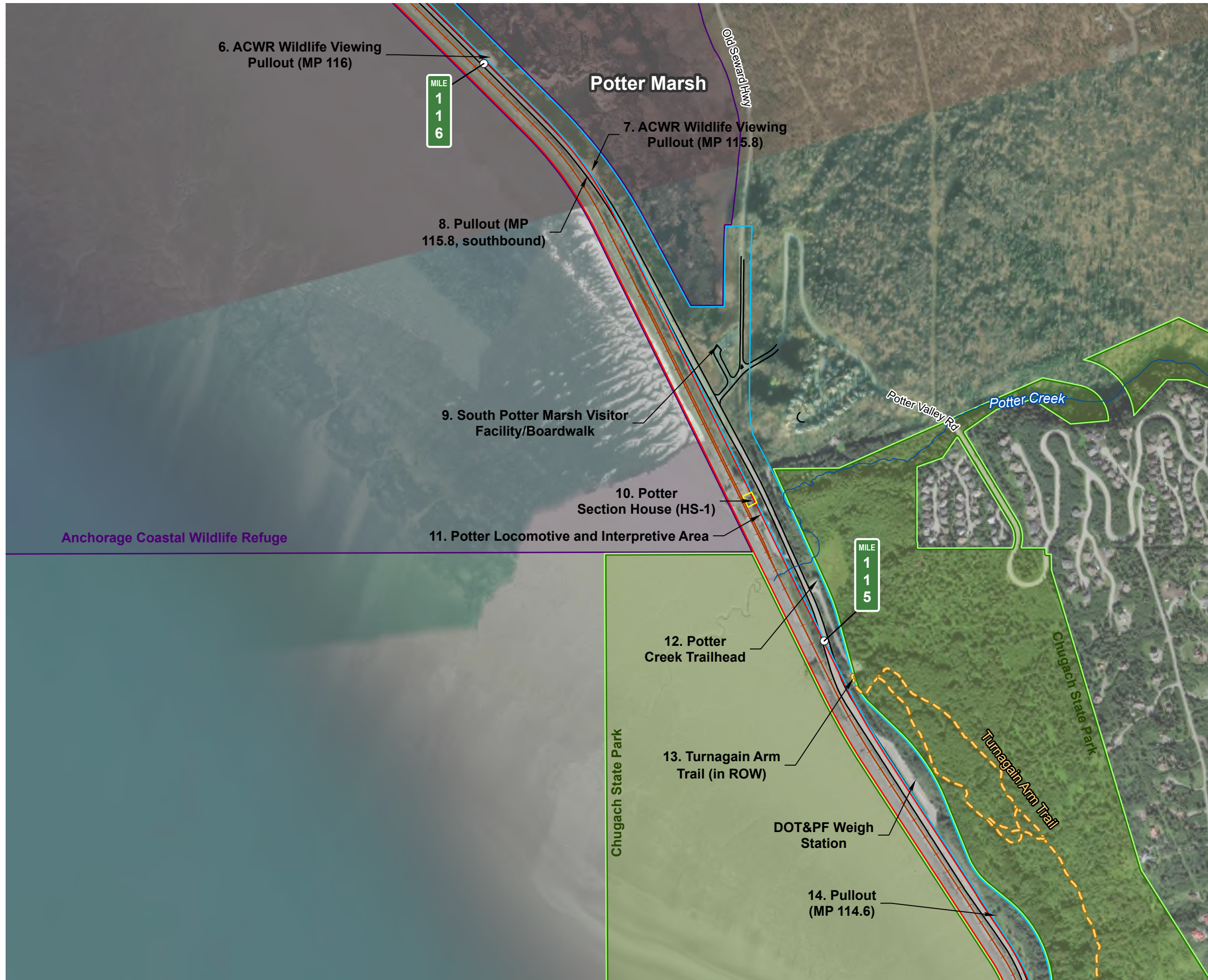
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- MOA Park
- State Land Parcel
- Trail or Pathway
- Stream



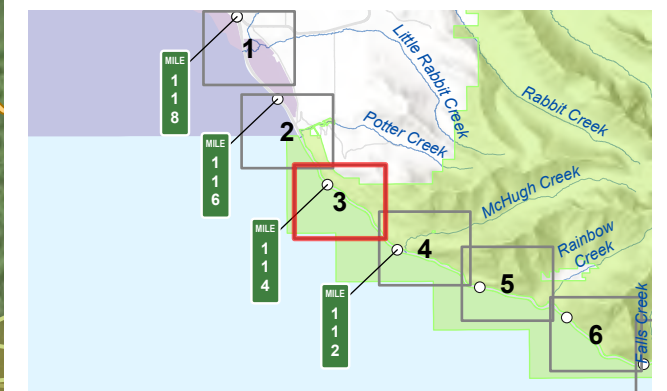
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- Chugach State Park Legislative Boundary
- Historic Site (HS-#)
- Trail or Pathway
- Stream



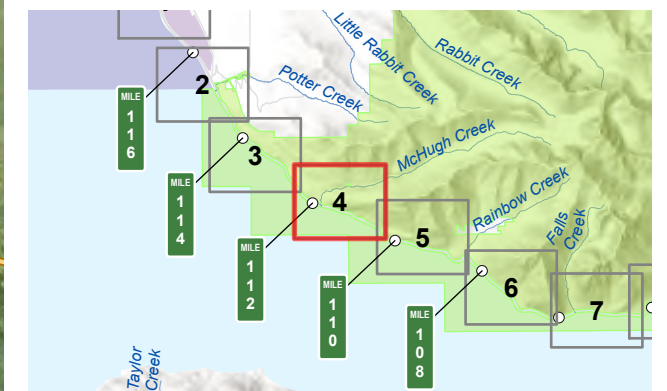
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- Trail or Pathway



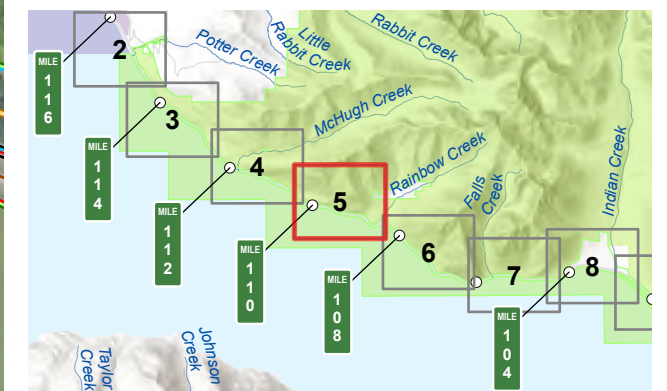
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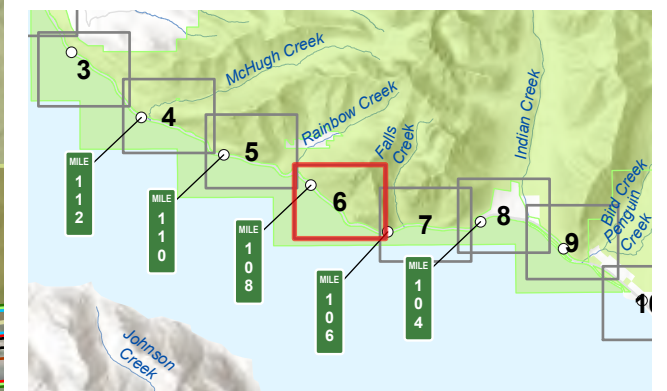
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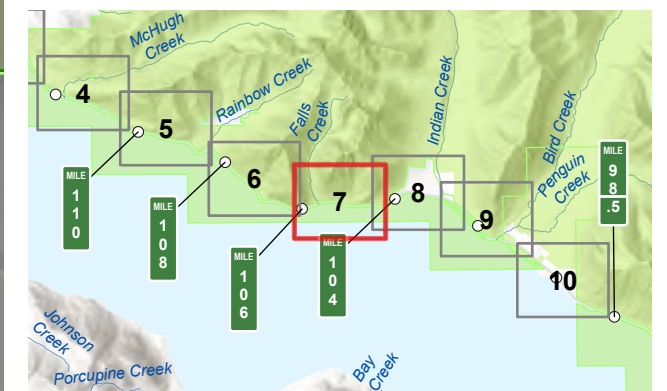
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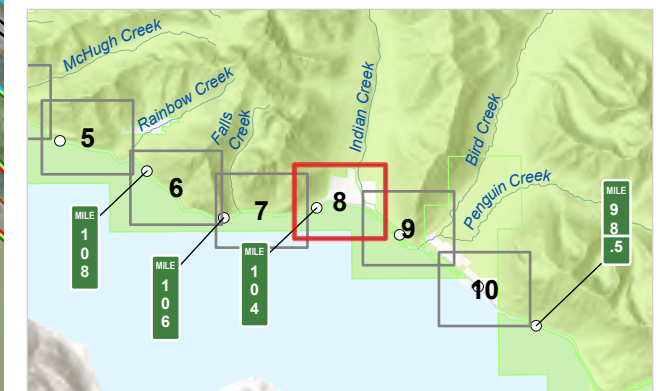
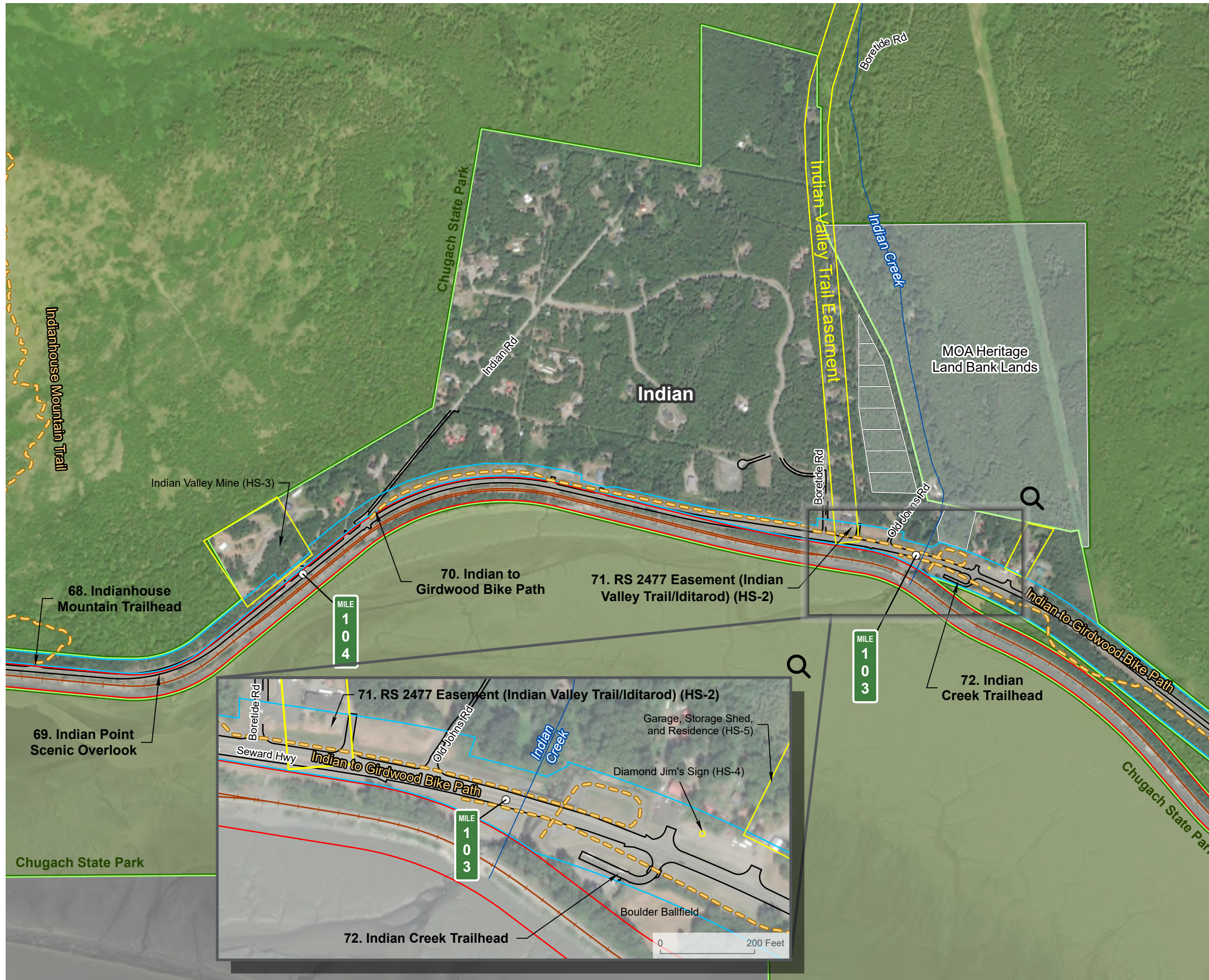
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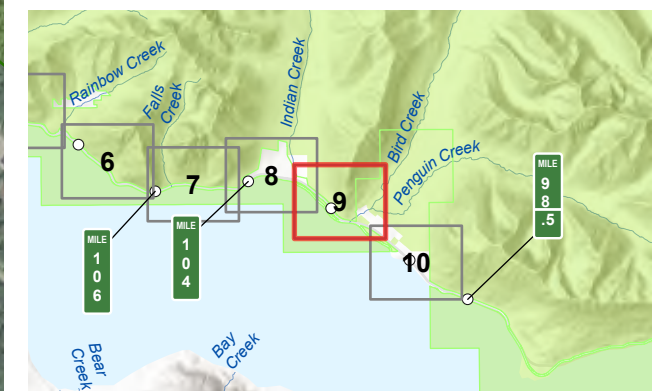
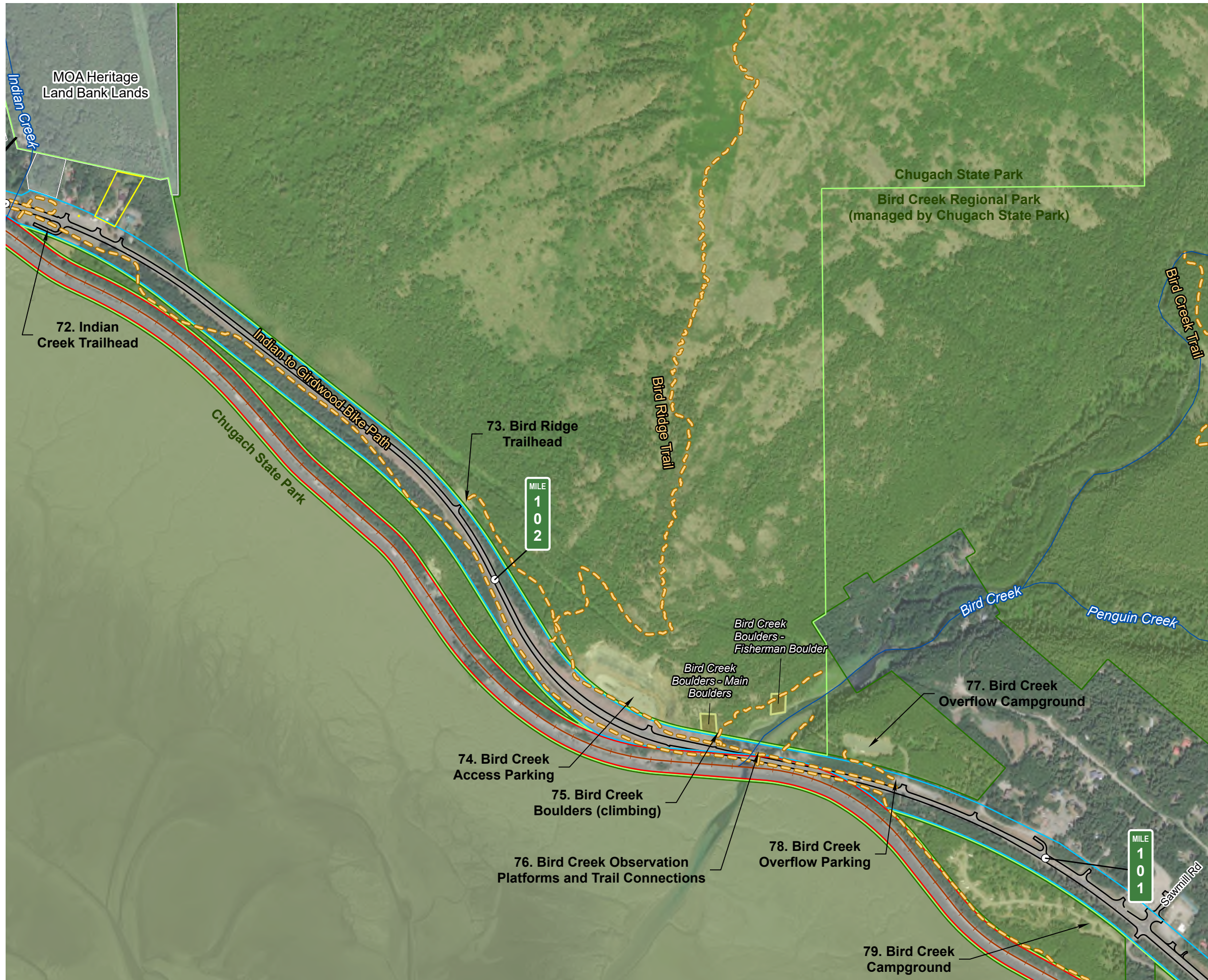
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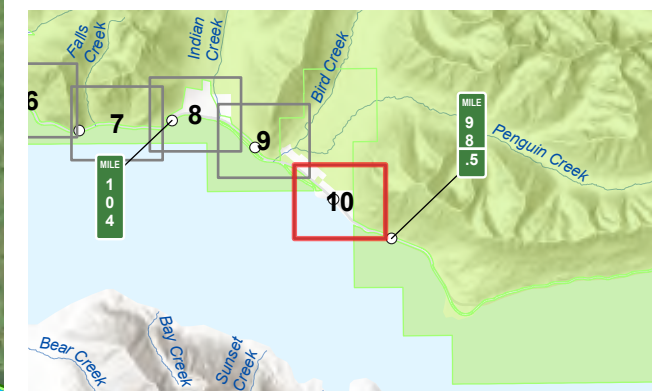
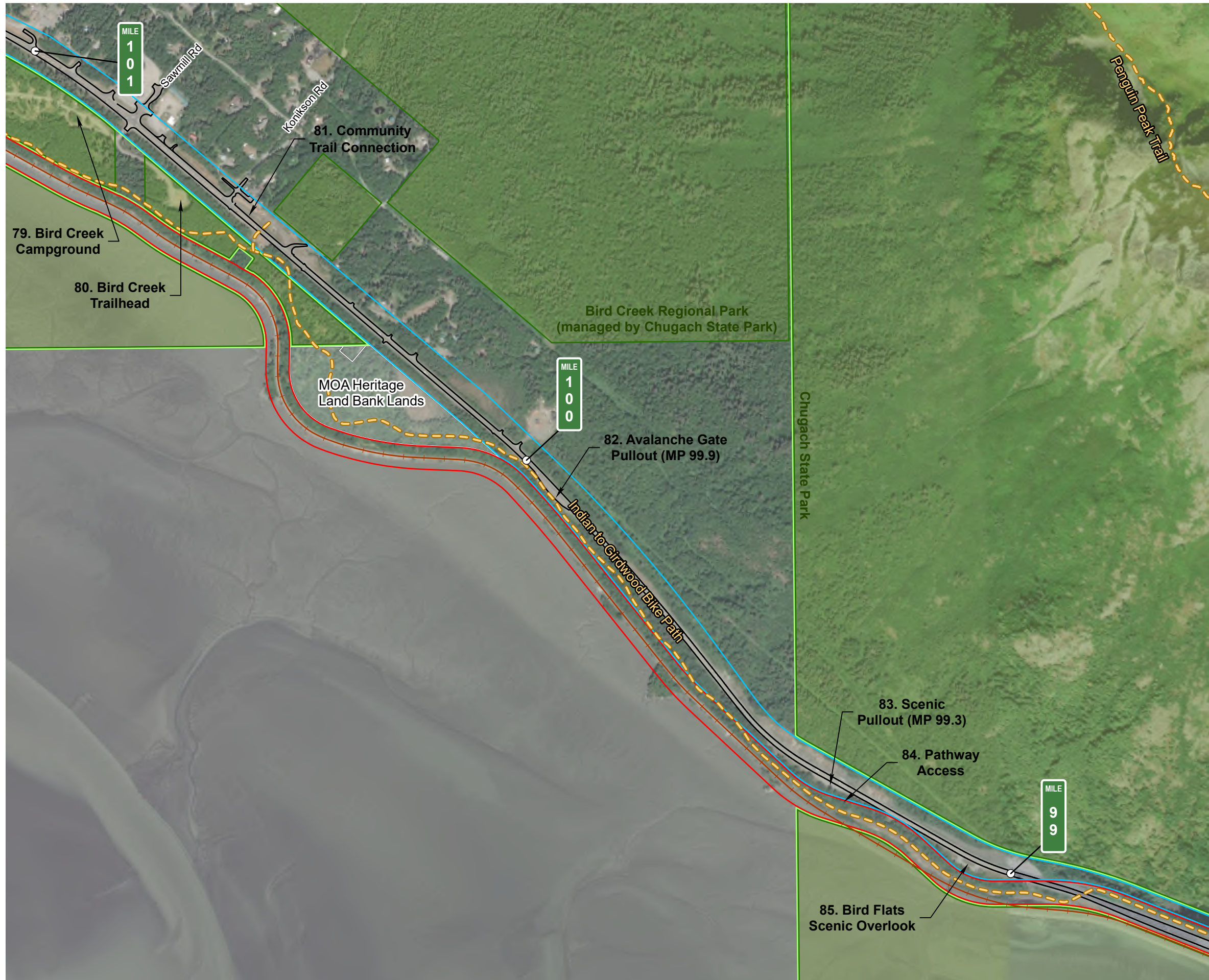
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## **Appendix C. Officials with Jurisdiction Mitigation Requests and Responses**

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**Officials with Jurisdiction Mitigation Consultations**

Table C-1 represents a summary of issues and concerns expressed by the Alaska Department of Fish and Game (ADF&G) and Alaska Department of Natural Resources (ADNR), Division of Mining Land and Water (DMLW) regarding Safer Seward Highway Project (Project) direct and indirect impacts to the Anchorage Coastal Wildlife Refuge (ACWR). It summarizes Officials with Jurisdiction (OWJ) requests to mitigate their concerns, and Alaska Department of Transportation and Public Facilities (DOT&PF) responses to each issue and request. Commitments added to the Project are listed in the *Individual Section 4(f) Evaluation* Section 5.3 Measures to Minimize Harm: Anchorage Coastal Wildlife Refuge. Table C-1 was developed using written Project correspondence and meetings.

**Table C-1. Anchorage Coastal Wildlife Refuge Mitigation Consultation**

OWJ Request	DOT&PF Response
Improve fish passage at Seward Highway culverts and the railroad waterway crossing to the west. Consider tidal influence and inflow from Rabbit Creek. Grade control must maintain water levels for waterfowl.	The Proposed Action would satisfy the requirements of the fish passage memorandum of agreement between ADF&G and DOT&PF for all anadromous fish streams; at Rabbit Creek, it would be designed to maintain water levels in Potter Marsh.
Alleviate impacts on private lands upstream of the ACWR at Potter Marsh that experience flooding.	The Proposed Action does not address issues upstream of Potter Marsh.
Support maintenance or repair requirements of the Potter Marsh North boardwalk to ensure continued safety for pedestrians.	The Proposed Action does not address the maintenance and repair of the boardwalk.
Provide parking to support the proposed Seward Highway bike path and the newly forming MOA Potter Marsh Watershed Park. This request is to avoid or minimize impacts on visitor parking at the North and South Potter Marsh Visitor Facilities for users interested in accessing the multi-use pathway.	The Proposed Action provides a few more parking spaces at the Potter Creek Trailhead and has expanded parking at major CSP facilities along the entire bike path (Beluga, Rainbow, Windy Corner, and Indian Creek), which should allow pathway users options throughout the corridor to find parking and minimize their occupancy of the Potter Marsh facilities to access CSP. DOT&PF is willing to provide modest additional parking for the multi-use pathway if a suitable location is identified and commits to further discussion with ADF&G, MOA, and CSP before final design regarding suitable access to the northern end of the multi-use pathway.
Improve water quality in the marsh by filtering via a swale or similar feature on the upstream side of Old Seward Highway to alleviate sedimentation from inflows from Little Survival, Rabbit, and Little Rabbit Creeks that accumulate in the marsh. This is intended to improve water quality and habitat for fish as well as maintain water depth for waterfowl.	The Proposed Action does not address sedimentation in Potter Marsh.
Create a separate trailhead maintained by DOT&PF and/or MOA Parks for access to the Project's multi-use pathway and the new municipal parkland east of Potter Marsh and the Old Seward Highway.	DOT&PF is willing to provide modest additional parking for the multi-use pathway if a suitable location is identified and commits to further discussion with ADF&G, MOA, and CSP before final design regarding suitable access to the northern end of the multi-use pathway.
Create a cooperative agreement to establish and fund a maintenance account for parking lots that are likely to contain ACWR and non-ACWR users. Although ADF&G is reluctant to take on more facility management duties, the management burden of managing toilets, parking lots, increased vehicle traffic, and trash should be shared across agencies.	DOT&PF commits to reopening existing cooperative agreements during final design of the Potter Marsh segment to update the agreements, as necessary.

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OWJ Request	DOT&PF Response
Design the bike path facility to separate ACWR visitation from bike path use. The experience of parking at the ACWR to walk the boardwalks is different than parking to bike to Girdwood.	The Proposed Action provides separation between the multi-use pathway and the existing North Potter Marsh Visitor Facility/Boardwalk.
Work with ADF&G during final design to identify whether and how to connect the marsh boardwalk with the proposed multi-use pathway to best meet user expectations and needs.	DOT&PF commits to working with ADF&G during final design to determine whether and how the multi-use pathway may connect (or not) as it passes near the marsh boardwalk within DOT&PF ROW. The current design keeps the facilities separated per request (see above), but DOT&PF is willing to work with ADF&G should their needs shift.
Resurface highway pullouts after trail construction and have any maintenance or refurbishment work completed while there is still heavy equipment access to them.	DOT&PF commits to working with ADF&G during final design to identify reasonable maintenance and refurbishment work that DOT&PF can complete while equipment is onsite near the three viewing pads along Potter Marsh.
Incorporate design, funding, and installation of ACWR signs along the multi-use pathway into the Project (e.g., education and ACWR rules).	DOT&PF commits to providing reasonable signage in the Potter Marsh area in consultation with ADF&G during final design.

Notes: MOA = Municipality of Anchorage

Table C-2 represents a summary of issues and concerns expressed by ADNR, Alaska Division of Parks and Outdoor Recreation (DPOR) regarding Project direct and indirect impacts on Chugach State Park (CSP). It describes measures to minimize harm that could minimize use or impact on CSP, and ways to replace or enhance functions of the park. Table C-2 summarizes OWJ requests to mitigate their concerns, and DOT&PF responses to each issue and request. Commitments added to the Project are listed in *Individual Section 4(f) Evaluation* Section 5.4 Measures to Minimize Harm: Chugach State Park. Table C-2 was developed using Project correspondence and meetings.

**Table C-2. Chugach State Park Mitigation Consultation**

OWJ Request	DOT&PF Response
<b>General</b>	—
Provide upgraded facilities (e.g., new pavement, toilets, kiosks) for every trailhead affected by the Project.	<p>DOT&amp;PF is committed to:</p> <ul style="list-style-type: none"> <li>• Replacing impacted parking at Potter Section House (at that location or nearby)</li> <li>• Rebuilding all impacted facilities at the Potter Creek Trailhead</li> <li>• Rebuilding and expanding the Rainbow Trailhead with a vault toilet</li> <li>• Rebuilding the Falls Creek Trailhead with added capacity if possible</li> <li>• Rebuilding and expanding the Windy Corner Trailhead with Dall sheep viewing facilities and toilet</li> <li>• Relocating and rebuilding the Indian Creek Trailhead for the Indian to Girdwood Bike Path</li> <li>• Discussing with CSP the potential to re-establish or relocate the former community trailhead for the Indian to Girdwood Bike Path at Little Penguin Creek.</li> </ul>
Require the construction contractor to use blasting techniques that result in a more natural appearance of the resulting rock face.	No specific changes or specifications to blasting technique is proposed. However, the Proposed Action is expected to blast in “lifts” that would leave small ledges where vegetation would eventually grow in irregular patterns.

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OWJ Request	DOT&PF Response
Provide grade-separated connections between trailheads or other park facilities and the multi-use pathway when they occur on opposite sides of the highway.	Such connections are further discussed under each trailhead/parking area below, but the following is an overall summary. DOT&PF will provide grade-separated crossings for the multi-use pathway extension (the trail itself) or for spur trails at five new locations: <ul style="list-style-type: none"> <li>• Potter Trailhead (MP 115.1)</li> <li>• McHugh Trailhead (MP 111.8)</li> <li>• Beluga Point/Sunshine Ridge (MP 110.1)</li> <li>• Windy Corner Trailhead (MP 106.6)</li> <li>• Community of Indian near Indian Valley Mine (MP 104.1)</li> </ul> Additionally, DOT&PF has committed to reconstructing four existing underpasses: <ul style="list-style-type: none"> <li>• Indian Creek (MP 103)</li> <li>• Bird Creek (MP 101.4, pedestrian only)</li> <li>• Bird/Little Penguin Creek (MP 100.5)</li> <li>• Bird Flats, near the Project's southern terminus (MP 98.9).</li> </ul>
Provide turning lanes for access to park trailheads/facilities so visitors do not have to drive a long distance in the opposite direction, then turn around and drive back to access a park area.	DOT&PF's Proposed Action provides turning lanes and direct access from both directions at: <ul style="list-style-type: none"> <li>• Potter Trailhead (via Potter Valley Road)</li> <li>• DOT&amp;PF Weigh Station (not a park facility, but would provide a turnaround opportunity)</li> <li>• McHugh Creek Day Use Area</li> <li>• Beluga Point</li> <li>• Rainbow Trailhead</li> <li>• Windy Corner Trailhead</li> <li>• Indian Creek Trailhead for the Indian to Girdwood Bike Path (via the frontage road accessed from Boretide Road)</li> <li>• Bird Creek Access Parking</li> <li>• Bird Creek Overflow Parking/Campground (via frontage road)</li> <li>• Bird Creek Campground</li> </ul>
Return any material sites to CSP and possibly use it for parking areas to benefit the park and users. CSP must be able to reasonably manage these sites (design to avoid material sites becoming attractive nuisances), and CSP must be able to charge fees. A good example is the existing Bird Creek Access parking site.	The Proposed Action would not create any material sites within the Project area. Ample material would be generated by cuts and excavation required within the proposed road footprint. Therefore, DOT&PF does not propose mitigation related to material sites.
Create a new headquarters and ranger station for CSP.	The Proposed Action would not directly affect the existing CSP headquarters, currently located at the Potter Section House; therefore, DOT&PF does not propose mitigation.
Relocate the ADNR shop/maintenance compound to a new location.	The Proposed Action would not directly affect the maintenance facility located near Potter Creek; therefore, DOT&PF does not propose mitigation. Access would be via the Potter Creek frontage road.
Evaluate parking capacity throughout corridor to make sure that the proposed Project provides sufficient capacity for CSP facilities. CSP estimated that 2 to 3 times existing capacity would be necessary to meet park needs through the design year (2052).	The Proposed Action increases the acreage of parking areas at the major turnouts, including Potter Creek, Beluga Point Viewpoint, Rainbow Trailhead, Windy Corner Trailhead, and Indian Creek (between both replacement parking areas near the pathway and the ballfield).
There is no safe emergency boat launch area in Project corridor.	The Proposed Action constructs a gated emergency boat ramp at the rebuilt Windy Corner Trailhead.

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<b>OWJ Request</b>	<b>DOT&amp;PF Response</b>
<b><i>Potter Section House and Interpretive Site/Potter Creek Trailhead</i></b>	—
Provide a trail connection from the Section House complex to Potter Creek Trailhead to facilitate site maintenance and oversight.	DOT&PF would connect the Potter Creek Trailhead to the Section House complex via trail spur from the multi-use pathway. The current plan calls for the multi-use pathway to pass under the highway near Potter Creek, adjacent to the trailhead. Extending a trail spur from this location to the Section House parking lot would add approximately 180 feet of trail construction and possibly a bridge for the trail. Accommodating the pathway in this way could require work that could encroach on the railroad track as it crosses Potter Creek. Design details would be addressed during final design.
Relocate the Potter Section House to turn it into a walk-in building/museum.	DOT&PF has modified early conceptual designs to ensure the Proposed Action would avoid Potter Section House, per Section 4(f) and Section 106 requirements, preserving it for whatever use CSP may have in mind.
<b><i>Potter Creek Trailhead</i></b>	—
Provide facility upgrades and a new latrine.	DOT&PF would replace the lower and upper parking areas with the same or greater capacity than current conditions, and would replace the trailhead overlook and kiosk, the start of the trail, and the vault toilet, unless the toilet could be avoided in final design. The site would be landscaped and replanted with native vegetation. Design of the site would be in consultation with or provided by CSP, at CSP's discretion.
<b><i>McHugh Creek Day Use Area</i></b>	—
Provide new latrines, latrine upgrades, trailhead upgrades, and picnic pavilion and associated facilities.	The Proposed Action would avoid the developed McHugh Creek Day Use Area, so DOT&PF has not proposed upgrades within the paved footprint of the day-use area.
Provide a safe, grade-separated crossing to the multi-use pathway from the parking area.	The Proposed Action would include a grade-separated pedestrian crossing of the highway. This could be a grade-separated crossing for a spur trail or the main pathway.
Provide trail construction support to develop and formalize small trails from McHugh parking areas to climbing areas and overlooks.	DOT&PF is committed to working with CSP to build or rebuild trails or viewpoints affected by blasting west of the day-use area and build alternative access, if needed, to the Crack in the Woods and Pivot Point rock climbing areas.
<b><i>Beluga Point Viewpoint</i></b>	—
Upgrade to establish viewing areas and ADA access. The OWJ encourages the construction of a pedestrian overpass at Beluga Point since public access across the railroad tracks has been identified by the National Transportation Safety Board as a safety issue.	The Proposed Action would upgrade, rebuild, and expand the scenic viewing area with an ADA-compliant pedestrian crossing over the railroad tracks to CSP lands outside the ARRC ROW. DOT&PF would work with CSP and trail advocacy groups during final design to ensure the site would work as well as possible for motorists and bicyclists passing through on the multi-use pathway.
<b><i>Sunshine Ridge Parking</i></b>	—
Provide a safe, grade-separated crossing to the multi-use pathway and Beluga Point parking area.	DOT&PF commits to providing a pedestrian underpass of the highway to connect the Sunshine Ridge area on the mountain side of the highway to the Beluga Point Viewpoint on the water side. This could be a grade-separated crossing for a spur trail or for the main pathway.
<b><i>Rainbow Trailhead</i></b>	—
Provide a safe, grade-separated crossing to the multi-use pathway from the parking area.	The Proposed Action provides parking adjacent to the multi-use pathway at Rainbow Point. The Proposed Action does not include a grade-separated highway crossing at the Rainbow Trailhead. However, DOT&PF has committed to crossings of the highway at several other locations where there is not a parking area on the opposite side of the highway; see above in this subsection under the "General" heading.
Provide a latrine as part of reconstructing the parking area.	DOT&PF commits to complete reconstruction of the Rainbow Trailhead, including a standard vault toilet to be built to CSP specifications and maintained by CSP.

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OWJ Request	DOT&PF Response
<b><i>Windy Corner Trailhead</i></b>	—
The mineral licks are important for Dall sheep and should be avoided.	DOT&PF has consulted with ADF&G, and the Proposed Action avoids the majority of the mineral licks within the area.
<b><i>The Grotto Pullout, MP 104.8</i></b>	—
Expand the parking for The Grotto.	DOT&PF has determined that the pullout is not a Section 4(f) resource. The Proposed Action would eliminate the feature and pullout, and no specific mitigation is proposed.
<b><i>Falls Creek Trailhead</i></b>	—
Expand parking capacity. CSP estimated that with planned trail connection between Windy Corner and Falls Creek, the parking capacity should be at least 2 to 3 times current size (alternate meeting, estimate was about 60 parking spots).	DOT&PF would fully replace the function and parking capacity of the existing parking area. In the Proposed Action, there is space for added capacity; assuming this is the case in final design, DOT&PF would provide additional parking capacity. Current design estimates about 40 parking spots, and additional room for a park vendor.
<b><i>Indianhouse Mountain Trailhead and Trail</i></b>	—
Establish a larger parking area.	DOT&PF has included a small pullout trailhead of approximately 2 to 3 times the capacity as the existing one at the Indianhouse Mountain Trailhead.
Reconstruct the trail where impacted by Proposed Action. Cautioned that trail construction may be difficult around the cliffs.	DOT&PF would reconstruct the start of the trail to ensure the continuing trail was reasonably accessible to hikers and would rebuild a portion of the trail west of the trailhead on a new alignment, because the cut for the expanded highway would impact a short trail segment.
<b><i>Indian Creek Trailhead</i></b>	—
Provide facility upgrades and a new latrine.	DOT&PF would establish a new ballfield/community park with reasonable access, and would use a design by CSP or in consultation with the community, CSP, and other stakeholders. A vault toilet similar to the existing toilet would be included.
<b><i>Bird Ridge Trailhead</i></b>	—
Provide facility upgrades and a new latrine.	The Proposed Action construction footprint would avoid the existing Bird Ridge Trailhead; parking and trail access would remain unchanged, so DOT&PF has not proposed upgrades.
<b><i>Bird Creek Overflow Parking and Bird Creek Overflow Campground</i></b>	—
Provide water system upgrades, new latrines, and facility upgrades for the campground and paving of the lower day-use parking area.	DOT&PF would maintain the existing disabled parking in the DOT&PF ROW at the driveway to the Bird Creek Overflow Campground.  There would be no impact to the Overflow Campground, so DOT&PF has not proposed upgrades at this location. No water system or latrines are included in the Proposed Action at this location.
In lieu of replacing and/or paving the Bird Creek Overflow parking (as noted, CSP subsequently requested paving Bird Creek Campground roads and camping site pads.	DOT&PF would support improvements to the Bird Creek Campground facility.
<b><i>Bird Creek Campground and Bird Creek Trailhead</i></b>	—
Pave campground roads and electrify the camp sites from the existing electrical service at the campground.	DOT&PF agrees to pave the campground roads and site pads, as well as extend the existing electrical utilities at the campground to electrify the camp site pads.
Provide improvements, including paving the campground and day-use area, electrifying the host site, establishing water and septic holding at the host site, upgrading the facility in general, adding a group camping area, and adding public use cabins.	DOT&PF has agreed to pave the campground and site pads as stated above. DOT&PF has agreed to extend existing electrical service to campsite pads, but does not intend to add group camping or public use cabins.

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<b>OWJ Request</b>	<b>DOT&amp;PF Response</b>
<b><i>Rock-climbing Areas</i></b>	—
Expand parking and access to Grunge Wall, Crack in the Woods, and Pivot Point rock climbing areas, assuming the Project would affect access. Provide design or financial support to develop small trails accessing Crack in the Woods and Pivot Point climbing areas from the McHugh Creek Day Use Area.	DOT&PF would work with CSP to provide adequate access to the Crack in the Woods and Pivot Point rock climbing areas, if needed.
<b><i>Turnagain Arm Trail</i></b>	—
Reroute and reconstruct trail farther uphill to a similar trail standard, in coordination with CSP.	DOT&PF would follow CSP design criteria, work with the existing topography to create a pleasant trail experience, and minimize the width of areas where trees are cleared for new trail segments to maintain a similar look and feel on the trail.
<b><i>Indian to Girdwood Bike Path</i></b>	—
Provide a separated, paved, bike path extending the entire Project area.	The Proposed Action provides a 14-mile, separated, multi-use pathway from Indian to Rabbit Creek Road. This new multi-use pathway would connect to the Indian to Girdwood Bike Path. It would be minimally separated from the paved highway shoulder by 10 feet, except in short sections where the pathway is along low-volume frontage roads in Bird and Indian as well as the shoulder of Potter Valley Road.
Re-establish the parking area for the pathway within the community of Bird and the Seward Highway ROW (located adjacent to Bird House Garage).	DOT&PF would discuss with CSP the potential to re-establish or relocate the former Bird Community Trail Connection for the Indian to Girdwood Bike Path (currently near Konikson Road) to avoid conflicts with adjacent landowners. The multi-use pathway underpass of the highway would be reconstructed.

Notes: ADA = Americans with Disabilities Act; ARRC = Alaska Railroad Corporation; ROW = right-of-way