

WINDY CORNER ENVIRONMENTAL ASSESSMENT

APPENDIX C

CULTURAL RESOURCES CONSULTATION

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Section 106 SHPO Concurrence Letters
(with a project finding of No Historic Properties Adversely Affected)



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources

DIVISION OF PARKS
Office of History & Archaeology

550 West 7th Ave., Suite 1310
Anchorage, Alaska 99501-3565
Main: 907.269.8721
E-mail: oha@alaska.net

January 4, 2016

File No.: 3130-1R FHWA
3330-6N SEW 1579

RevComp Id: 2015-01904

SUBJECT: Seward Highway MP 105-107, Windy Corner Safety Improvements,
Project No. NH-0A3-1(34)/56631

Erik Hilsinger
Department of Transportation & Public Facilities
PO Box 196900
Anchorage, AK 99519-6900

Dear Mr. Hilsinger,

The Alaska State Historic Preservation Office (AK SHPO) received your letter (dated December 16, 2015) on December 17, 2015 and attached report titled *Cultural Resources Investigation for the Seward Highway MP 105-107, Windy Corner Safety Improvements Material Site 6*. Following our review of the documentation provided, our office concurs with your finding that SEW-1579 (Historic Camp) is not eligible for the National Register of Historic Places. Additionally, we reviewed the subject undertaking pursuant to Section 106 of the National Historic Preservation Act. Following our review, we concur that the Seward Highway MP 105-107, Windy Corner Safety Improvements Project still results in a finding of no historic properties adversely affected. We originally concurred with this finding in our February 6, 2015 letter. The expansion of the area of potential effects (APE) to include Material Site 6 does not change this finding for the project.

For this project please review the *Memorandum of Agreement Between State of Alaska and Bureau of Land Management, U.S. Department of the Interior Concerning the Iditarod National Historic Trail*, as well as, *The Iditarod National Historic Trail (INHT) Seward to Nome Route, A Comprehensive Management Plan (CMP)*. In your letter you noted that SEW-566 (Potter Connecting Trail to the INHT) was not positively identified in the APE but may exist in remnant form. We recommend that you consider management, development, and protection of trail segments as outlined in these documents. If you have questions regarding the CMP, contact the Bureau of Land Management's Iditarod National Historic Trail Administrator Kevin Keeler, at kkeeler@blm.gov.

Please note that as stipulated in 36 CFR § 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations. Please note that our comment letter does not end the 30-day review period provided to other consulting parties. Should unidentified cultural resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR § 60.4) in consultation with our office.

Thank you for the opportunity to review and comment on the subject undertaking. Please contact Mark Rollins at 269-8722 or mark.rollins@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:mwr



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

550 West 7th Avenue, Suite 1310
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February 6, 2015

File No.: 3130-1R FHWA
3330-6 ANC-04057

RevComp Id: 2015-00092

SUBJECT: Seward Highway MP 105-107, Windy Corner Safety Improvements, Project
No. NH-0A3-1(34)/56631

Laurie Mulcahy
Department of Transportation & Public Facilities
PO Box 196900
Anchorage, AK 99519-6900

Dear Ms. Mulcahy,

The Alaska State Historic Preservation Office (AK SHPO) received your letter (dated January 15, 2015) on January 15, 2015 and attached report titled *Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057)*. Following our review of the documentation provided, our office concurs with your finding that the Turnagain Arm District of the Alaska Railroad (ANC-04057) is eligible for the National Register of Historic Places under *Criterion A*. Additionally, we reviewed the subject undertaking pursuant to Section 106 of the National Historic Preservation Act. Following our review, we concur with your finding that the Seward Highway MP 105-107, Windy Corner Safety Improvements project would result in a finding of no historic properties adversely affected; specifically the Turnagain Arm District of the Alaska Railroad (ANC-04057).

Please note that as stipulated in 36 CFR § 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations. Please note that our comment letter does not end the 30-day review period provided to other consulting parties. Should unidentified cultural resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR § 60.4) in consultation with our office.

Thank you for the opportunity to review and comment on the subject undertaking. Please contact Mark Rollins at 269-8722 or mark.rollins@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judith E. Bittner".

Deputy Judith E. Bittner
State Historic Preservation Officer

JEB:mwr

Replies to 9/26/13
Section 106 Initiation Letter



October 25, 2013

PROJECT MANAGEMENT

TEL 907.265.3095

FAX 907.265.2638

e-mail: lindamood@akrr.com

Al Fletcher
Federal Highway Administration
P.O. Box 21648
Juneau, AK 99802-1648
P.O. Box 196900
Anchorage, Alaska 99519

Subject: Seward Highway Mile Posts 105-107, Windy Corner Safety Improvements
Project No. NH-0A3-1(034)/56631

Dear Mr. Fletcher:

Thank you for your letter of September 26, 2013 to Barbara Hotchkin initiating consultation under the National Historic Preservation Act regarding Seward Highway Safety Improvements in the Windy Corner area. The Alaska Railroad Corporation (ARRC) has been providing input on the Windy Corner project and other Alaska Department of Transportation and Public Facilities (DOT&PF) and Federal Highway Administration (FHWA) Seward Highway improvement projects for a number of years. Until recently, we had every reason to expect that the Windy Corner project would proceed similar to other recently implemented DOT&PF and FHWA projects along the Seward Highway that have involved relocation of a portion of the Alaska Railroad. For those projects, no determination of eligibility was conducted for any portion of the railroad as part of Section 106 consultation, although individual railroad-related resources were addressed as necessary.

We are disappointed to learn from your recent letter that FHWA and DOT&PF have decided to modify their approach for the Windy Corner project, and conduct a determination of eligibility for at least a portion of the Alaska Railroad (SEW-029). The applicable Section 106 laws and regulations have not substantively changed – the only thing that has changed is DOT&PF's and FHWA's approach relative to the railroad. We have previously made both FHWA and DOT&PF aware of our concerns with this approach, and we remain opposed to a determination of eligibility for the railroad for this project. As we have previously discussed, a determination that the railroad is eligible has significant long term adverse implications for railroad operations that have not been resolved with the Office of History and Archeology/State Historic Preservation Officer.

Two possible solutions to resolve this situation come to mind, as summarized below. FHWA and DOT&PF may also identify with a solution that we have not thought of, and we are receptive to any suggestions you may have.

1. FHWA and DOT&PF could revert to its previous approach, and not conduct determinations of eligibility for the railroad or segments of the railroad for the Windy Corner project or future similar projects. The railroad could be identified as potentially eligible or assumed eligible for the purpose of making a determination of effect for the proposed project only. This approach has been successful for many previous projects, and there is no apparent justification of the recent change in approach.
2. FHWA and DOT&PF could abandon further design of the currently proposed alternative for Windy Corner, and consider alternatives that do not require realigning any portion of the railroad or construction within the railroad right-of-way. Under such alternatives, a determination of eligibility for the railroad would not be needed, as the Area of Potential Effects (APE) could be more narrowly defined, and would exclude the railroad.

If DOT&PF and FHWA decide to proceed with a determination of eligibility for a segment of the railroad and it is found eligible for the National Register, ARRC will require mitigation for the anticipated long term adverse implications that determination will have for ARRC for future maintenance and operations prior to any construction activities taking place within railroad right-of-way. DOT&PF and FHWA would be required to fund ARRC's efforts to prepare a programmatic agreement (PA) among SHPO, pertinent federal agencies, with ARRC and DOT&PF as invited signatories. The FHWA determination of eligibility and resultant PA will undoubtedly result in unquantifiable additional costs to ARRC. Because these costs would be the result of DOT&PF and FHWA actions, the mitigation will include an agreement such that any and all future expenses incurred by ARRC for any work required on historic railroad resources will be borne by DOT&PF and FHWA in perpetuity. This mitigation will be independent of any finding of effect for Section 106 purposes – it will be needed regardless of whether FHWA determines this project would or would not have an adverse effect on a potential railroad historic property.

Thank you in advance for your prompt attention to this matter. We look forward to reaching a mutually agreeable solution on the Section 106 issue. If we are unable to come to agreement on this issue, ARRC will continue to support highway safety improvements projects, but those safety improvements would need to be achieved through implementation of design alternatives that do not involve relocation of the railroad.

Please contact me at (907) 265-3095 if you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end.

Brian Lindamood, P.E.
Director, Project Management

Cc: (via e-mail)
Tom Schmid, DOT&PF
Mark Boydston, DOT&PF
Brian Elliott, DOT&PF
Valerie Gomez, DOT&PF
Laurie Mulcahy, DOT&PF
Teresa Zimmerman, DOT&PF
Barbara Hotchkin, ARRC
Clark Hopp, ARRC

Gomez, Valerie L (DOT)

From: Bunnell Kristine <BunnellKR@ci.anchorage.ak.us>
Sent: Thursday, October 10, 2013 4:49 PM
To: 'brian.elliott@alaska.gov'
Cc: Wong, Carol C.; Gomez, Valerie L (DOT); Duvall, Shina A (DNR)
Subject: NH-0A3-1 (034)/56631 Seward Highway Realignment

Dear Brian,

Thank you for the opportunity to review this project. I concur with the SHPO regarding no impacts to historic resources. However, I would like to add that we would appreciate further consultation should the historical sign at Diamond Jim's be potentially affected by this project. From what I could ascertain from the informational packet, the Diamond Jim property, therefore the Diamond Jim sign is outside the area of consideration.

Thank you, Kristine Bunnell

Kristine Bunnell
Senior Planner | Project Manager
Municipality of Anchorage
Long Range Planning Section
bunnellkr@muni.org
907.343.7993

Replies to 1/15/15
Section 106 Findings Letter



February 6, 2015

PROJECT MANAGEMENT

TEL 907.265.3095

FAX 907.265.2638

e-mail: lindamood@akrr.com

Laurie Mulcahy
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Subject: ARRC Comments -- Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057) (August 2014)
Project No. NH-0A3-1(34)/56631

Dear Ms. Mulcahy:

Thank you for your letter of January 15, 2015 providing the Alaska Railroad Corporation (ARRC) with a copy of the Determination of Eligibility (DOE) for the Turnagain Arm Division of the Alaska Railroad (ANC-04057), along with the finding of effect. The DOE, dated August 2014, is for the Seward Highway MP 105-107 Windy Corner project planned by the Alaska Department of Transportation & Public Facilities (DOT) and the Federal Highway Administration (FHWA). This letter provides ARRC's support for the finding of effect and also provides several additional comments on the DOE.

Finding of Effect

The project would realign approximately 2.0 miles of the 36.6 mile corridor, moving the corridor a maximum of 425 feet from hit current alignment. DOT has found that the project would have no adverse effect on the Turnagain Arm Division of the Alaska Railroad (ANC-04057). We agree with both the finding and DOT's rationale for making the finding. We believe the proposed realignment of the railroad in project corridor is fully consistent with realignments that occurred both before and after 1964. Such realignments have been and will always be needed to enhance safety, increase operational efficiencies, and ensure the functionality and continuity of the railroad. They reflect the historic operating patterns of railroads. With implementation of the proposed project, the linear rail transportation corridor would still extend along Turnagain Arm, and its continuity and function would remain intact, conveying the sense of a train traveling to a destination. Train passenger views of Turnagain Arm would be largely unchanged, as would views of the rail corridor.

Additional Comments on the DOE

ARRC provided comments on the draft DOE (June 2014) in a letter dated July 31, 2014. We believe the revised August 2014 DOE is substantially improved, and we appreciate the efforts by DOT and Cultural Resource Consultants (CRC) to address our concerns.

That said, we are surprised that some ARRC comments were not addressed. Many of those comments are summarized in the attached table for use if DOT prepares an Errata Sheet or Addendum to the August 2014 DOE. The railroad has evolved over time, and many realignments and other improvements to modernize the railroad have occurred since 1964. The need for such modernization did not end at the end of the identified period of significance --- improvements will continue to be needed to enhance safety and ensure the functionality and continued operation of the railroad. As such, we believe that information on improvements in the corridor and when they were constructed is important and should have been included whenever possible. Otherwise, readers may have the mistaken impression that they were present in 1964, the end of the period of significance.

Ms. Mulcahy
February 6, 2015
Page 2 of 2

Thank you for the opportunity to comment on the DOE and Finding of Effect. Please contact me at (907) 265-3095 or Barbara Hotchkin at (907) 265-2313 if you have questions or require additional information.

Sincerely,



Brian Lindamood, P.E.
Director, Capital Projects

Cc: Barbara Hotchkin, ARRC
Tom Schmid, PE, DOT&PF
Brian Elliott, DOT&PF
Mark Boydston, DOT&PF
Tim Haugh, FHWA Alaska Division
Judy Bittner, SHPO

ARRC's Comments on the August 2014 Windy Corner Determination of Eligibility
for the Turnagain Arm District of the Alaska Railroad (ANC-04057)

Page	Section	Comment
6-7	Recent History	This section of the report mentions no history beyond the State's acquisition of the railroad in 1985. ARRC believes that, at a minimum, this section should acknowledge the routine maintenance and many safety and efficiency improvements that have occurred in the corridor since 1985, not just to the rail line itself, but also to the communications system, avalanche control, the nearby Seward Highway, etc. Numerous realignments and other improvements have occurred, but the continuity and functionality of the linear rail corridor have been maintained -- it still extends along Turnagain Arm and conveys the sense of a train traveling to a destination.
8	Associated Sites Listed in the AHRs	ARRC Bridge 74.5 over Glacier Creek (SEW-0124) is associated with the Alaska Railroad, but it is not mentioned in this section. It is an 80-foot through girder on concrete abutments erected in 1922.
11	Portage to Potter	This segment of the rail corridor remains <u>generally</u> in its historic location.
12	Portage to Potter	<p>The report correctly acknowledges that the Alaska Railroad is routinely maintained, upgraded, and realigned to preserve the integrity of the corridor and ensure that the railroad remains functional. Bulleted items describing some of those activities are provided. The following items should also have been included.</p> <ul style="list-style-type: none"> maintaining, repairing, replacing, upgrading, removing, or installing railroad signals, safety devices, security systems or access control features, and communications systems repairing or replacing existing utilities, removing utilities, and installing new utilities removing snow, mud, ice, rock, and other debris from the track, embankment, roads, or side slopes, or similar debris blocking culverts or drainage channels, and stabilizing or restoring failing slopes to maintain existing facilities <p>In addition, two bulleted items included in the report warrant further clarification (underlined text):</p> <ul style="list-style-type: none"> maintenance, repair, replacement, or upgrading of bridges and culverts, <u>including replacing bridges with culverts and vice versa.</u> maintenance, upgrading, or removal of existing at-grade <u>or grade-separated</u> highway/railroad crossings or private crossings, and construction of new railroad crossings
12-13	Portage to Girdwood	<p>The reference to the Whittier Spur is not correct -- it should be to the Whittier Branch. It is also not correct to state that the wye has been in place since the railroad was constructed. The wye was constructed when the Whittier Branch was constructed. Additional information that should have been included in this section is as follows.</p> <ul style="list-style-type: none"> At Mile 64.4, a seasonally used snow machine crossing was recently installed. It appears as though this segment of the railroad was not moved substantially when the highway was constructed, but at least six curves (5 to 11 degrees) were realigned between 1968 and 2010. The 1918 alignment maps identify 12 bridges between Portage and Girdwood, and according to a 1968 track map, there were six river crossings with bridges and 5 culverts. By 2010, three bridges remained. Information on the bridges removed since 1968 is as follows. Former Bridge 70.7 over Kern Creek, consisting of six 14-foot timber spans and an 80-foot deck girder, was present in 1968, but by 1977, it had been replaced with two 10-foot diameter culverts. Former Bridge 73.9 over Virgin Creek (eight 14-foot timber spans) and former Bridge 74.2 over Swamp Slough (four 14-foot timber spans) were present in 1968, but by 1977, they also had been replaced with culverts (Alaska Railroad 1968 and 1977).
13	Portage to Girdwood	Bottom paragraph -- Clearly, the railroad only removed some of the remaining piles, as some piles are still visible in the river.
14	Portage to Girdwood	The 4 th paragraph regarding communications and signal equipment is incomplete. It should read as follows. Communications and signal equipment has been installed in the Portage area during the last several years to enhance safety. At MP 64.3, train control signals, a bungalow, propane tank, and power meter and distribution equipment were installed. The Portage communications site at MP 64.4 has a shelter and communications tower. Communications and/or signal equipment installed in the Girdwood area include a tower/antenna, bungalow, and associated equipment at the MP 74.9 avalanche building. At MP 75.0, a high/wide clearance detector bridge, bungalow and communication tower are present.
14	Portage to Girdwood	The 5 th paragraph refers to a small open-sided passenger station at Girdwood. We believe it is important to note that the station is not historic, having been constructed in the 1990s. To the west of the Girdwood Station at MP 74.96 is an at-grade crossing for a DOT maintenance road. The year that DOT constructed the traffic e bridge and pedestrian overpass for the Alyeska Highway over the track at MP 74.74 should also be identified, but this information would need to come from DOT.

ARRC's Comments on the August 2014 Windy Corner Determination of Eligibility
for the Turnagain Arm District of the Alaska Railroad (ANC-04057)

14	Girdwood to Bird Siding	The 1 st paragraph in this section refers to several curves that were realigned between 1968 and 2010. To be more specific, at least at least 14 curves (3 to 10 degrees) were realigned in addition to the five curves that were eliminated.
14-16	Girdwood to Bird Siding	We recommend that more detailed information be included about DOT's Bird to Gird project, which was constructed after 1964, and resulted in changes in the railroad alignment and setting. Notably, these changes apparently did not affect the eligibility of the rail corridor for the NRHP.
16	Girdwood to Bird Siding	The 1st paragraph regarding communications and signal equipment is incomplete. It should note that this equipment has been installed over the last several years. It should also include the bungalow with solar/wind bridge and communications antennas installed at MP 81.44.
16	Girdwood to Bird Siding	2 nd paragraph. This is new separated grade crossing at MP 80.86 constructed as part of the DOT Bird to Gird Project. In addition, a new at-grade crossing was constructed MP 77.7 for State Parks personnel access the bike path.
18	Rainbow to Potter	The last paragraph on the page incorrectly identifies the length of the Rainbow and Potter sidings. Rainbow Siding is currently 792 feet (not 2,179 feet). Potter Siding is currently 2,179 feet (not 792 feet).
18	Rainbow to Potter	The following information about communication and/or signal improvements should have been included in this section. Communications and/or signal equipment installed during the last several years to enhance the safety includes bungalows (each with a solar/wind bridge and communication antennas) at MP 93.2 and MP100.2.
22	Defining Characteristics of a Historic Railroad Corridor	ARRC remains concerned about the reliance on the 2007 Minnesota Statewide Historic Railroads Study Project Report (by Andrew J Schmidt and Daniel R. Pratt for the Minnesota Department of Transportation). The DOE provides a summary of that document, but never modifies the approach, as appropriate, for evaluating the Alaska Railroad. We believe that the property type "railroad corridor" should include only key (not all) buildings, structure and objects. Also, the boundaries of the historic corridor must acknowledge that right of way adjustments needed to maintain the connectivity and functionality of the historic rail corridor have and will continue to occur.
23	Defining Characteristics of a Historic Railroad Corridor	In the 4 th full paragraph, there should be some mention of the heavier weight rail used today, and the use of welded rail. Not all rail is in 33-foot segments, as welded rail has been used in the corridor. Also, 75 lb. rail was used when the railroad was initially construction, and 115 lb. rail is currently used.
23-24	Eligibility of the Turnagain District	The statements about the section houses are inaccurate. The Potter Section House is a former railroad section house, but it is no longer owned by ARRC, nor is it a functioning section house. There are other section houses along the railroad, although we are not aware of any that are over 50 years of age.

Mulcahy, Laurie A (DOT)

From: Bunnell Kristine <BunnellKR@ci.anchorage.ak.us>
Sent: Monday, March 09, 2015 4:45 PM
To: Mulcahy, Laurie A (DOT)
Cc: Perry, Susan
Subject: Project No. NH-0A3-1(34) / 56631

Laurie,

I concur with the SHPO that there will be no adverse effects on historic properties with this project. Recommend that a robust public outreach effort is conducted to advise the public regarding delays, heightened safety awareness for travelers and construction personnel, temporary pull-outs (if any) for views and emergencies.

Thank you, Kristine

Kristine Rene' Bunnell
Senior Planner | Project Manager
Municipality of Anchorage - Long Range Planning Section
bunnellkr@muni.org
907.343.7993

DOT&PF's 3/20/15 Reply to
ARRC's 2/6/15 Response to
DOT&PF's 1/15/15 Section 106 Findings Letter



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Transportation
and Public Facilities**

DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL

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In Reply Refer To:
Seward Highway MP 105-107, Windy Corner Safety Improvements
Project No. NH-0A3-1(34) / 56631
March 20, 2015

Mr. Brian Lindamood, P.E.
Director, Capital Projects
Alaska Railroad Corporation
327 West Ship Creek Avenue
Anchorage, AK 99501

Dear Mr. Lindamood:

Thank you for your comments of February 6, 2015 on the Seward Highway Milepost (MP) 105-107 project and on the determination of eligibility (DOE) for the Turnagain Arm Division of the Alaska Railroad (ANC-04057). In response to our January 15th letter, we also received concurrence on our finding of no adverse effect from the State Historic Preservation Officer (SHPO), which I provided to Barb Hotchkin of your office earlier.

I appreciate your support of the project and agreement in our finding of no adverse effect. I also understand your concerns in wanting accurate information about the improvements that have been made to the Turnagain Arm Division railroad corridor in the DOE documentation. Your review and research to compile Alaska Railroad Corporation (ARRC) comments on the August 2014 DOE were thorough and presented as an Errata Sheet so that it could be included with the DOE to be part of the record. We have bound your Errata Sheet as the first two pages of the DOE (enclosed) and will also provide a copy to SHPO for inclusion in the Office of History and Archaeology project files.

Please let me know if you have any questions or if I can be of further assistance. I can be reached at the address above, by telephone at (907) 269-6229, or by e-mail at laurie.mulcahy@alaska.gov.

Sincerely,

A handwritten signature in blue ink that reads "Laurie Mulcahy".

Laurie Mulcahy
Statewide Environmental Office
Cultural Resources Manager

Enclosure: Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057), August 2014 with ARRC Errata Sheet

Cc w/ enclosure:

Barbara Hotchkin, ARRC Manager, Permits & NEPA
Judy Bittner, SHPO

Electronic cc w/ enclosure:

Tom Schmid, P.E., DOT&PF Central Region, Project Manager
Brian Elliott, DOT&PF Central Region, Regional Environmental Manager
Erik Hilsinger, DOT&PF Central Region, Cultural Resources Specialist
Tim Haugh, FHWA Alaska Division, Environmental Program Manager

Replies to 12/16/15
Section 106 Findings Letter

ALASKA

RAILROAD

January 19, 2016

ENGINEERING SERVICES
TEL 907.265.2313
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EMAIL Hotchkinnb@akrr.com

Erik Hilsinger
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Subject: ARRC Comments -- Seward Highway MP 105-107, Windy Corner Safety Improvements
Project No. NH-0A3-1(34)/56631

Dear Mr. Hilsinger:

Thank you for your December 2015 letter providing the Alaska Railroad Corporation (ARRC) with an opportunity to comment on the determination of effect for Material Site 6, which is associated with the Seward Highway MP 105-107 Windy Corner project planned by the Alaska Department of Transportation & Public Facilities (DOT). ARRC's supports the finding of effect. We are also providing several comments regarding the Potter Connecting Trail for your information.

The letter indicates that the Potter Connecting Trail (SEW-00566/ANC-00279) may exist in remnant form within the APE, but that identification efforts were unable to positively identify the trail. The letter further states that "It is very likely the trail was the railroad grade and use was discouraged once the track was completed to Anchorage and dog teams were banned from the right of way in Circular 265 and further warned away in Circular 349, published in the Alaska Railroad Record (Alaska Railroad Record Volume 1, No. 51, October 1917; Volume III No. 4, 1918)." The letter neither documents nor otherwise supports the assertion that the trail was very likely the railroad grade, or that it is or ever was located within the railroad right-of-way (ROW). In fact, the documentation that is available throws doubt on those conclusions. In the *Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057) (2014)*, CRC cites Carberry and Lane and notes that the trail was used primarily during railroad construction. The Alaska Engineering Commission (AEC) improved the trail during railroad construction, when it served as a supply route for the construction camps. We believe that it is possible that once railroad construction was complete, mushers temporarily and inappropriately used the improved road bed and ROW, necessitating the 1918 notice warning drivers of dog teams to keep off both the track and the railroad ROW.

It is ARRC's position that no portion of the trail exists within the railroad ROW in this area. The land in question, roughly ARRC MP 89 to 94, was first conveyed to ARRC from the federal government by an interim conveyance dated January 5, 1985, Book 1212, Page 260, Anchorage Recording District, at Page 269 (SM T11N R2W S 32 & 33) and an exclusive license dated January 5, 1985, Book 1212, Page 297, Anchorage Recording District, at Page 312 (SM T10N R2W S 1,2 & 3) with final conveyance made via U.S. Patent 50-2005-0043 on November 23, 2004, Lot 1 and Parcels A through M, U.S. Survey No. 9013, officially filed August 27, 1990. There is no mention of the Iditarod National Historic Trail in the interim conveyance, the exclusive license, the patent, or the survey plat. The BLM Master Title Plat also does not identify any such encumbrance.

We understand that the AHRs cards for the Potter Connecting Trail identify it as part of the Iditarod National Historic Trail (INHT) system. However, for your information, please note that the 1986 Iditarod National Historic Trail Comprehensive Management Plan identifies criteria for inclusion of non-federal sites and segments into the INHT system (see page 61). Notably, "ONLY THOSE SITES AND SEGMENTS (OR PORTIONS THEREOF) LOCATED ON FEDERAL LANDS ARE ESTABLISHED AS INITIAL COMPONENTS OF THE IDITAROD TRAIL SYSTEM." Other identified and unidentified non-federal segments may later become components of the Iditarod Trail system through application from the owner (private, local, or State) to the Secretary of the Interior, through the BLM." Although the Potter Connecting Trail is identified in the 1986 Plan as a connecting trail to a primary route, any portion of it thought to be within the railroad ROW was then and still is a non-federal segment because by 1986 the ROW had already been conveyed to ARRC, a non-federal entity. ARRC has made no application to the

Secretary of the Interior for inclusion of this segment in the INHT system, and there is no cooperative agreement in place between ARRC and BLM regarding any ARRC management role and responsibilities for a trail segment in the ARRC ROW. These facts lead to the conclusion that the Potter Connecting Trail does not exist within the railroad ROW.

Thank you for the opportunity to comment. Please contact me at (907) 265-2313 or Brian Lindamood at (907) 265-3095 if you have questions or require additional information.

Sincerely,



Barbara C. Hotchkin
Sr. NEPA & Project Permitting Analyst

Cc: (via e-mail)
Tom Schmid, DOT&PF
Brian Elliott, DOT&PF
Laurie Mulcahy, DOT&PF
Brian Lindamood, ARRC
Jeanette Greenbaum, ARRC

**Seward Highway MP 105 – 107
Windy Corner Safety Improvements
Project 0A31034/Z566310000**

Section 106 Initiation and Findings Letters Distribution List
(SHPO Letters for Each Included)

State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Native Village of Eklutna
26339 Eklutna Village Rd.
Chugiak, Alaska 99567

Eklutna, Inc.
16515 Centerfield Drive
Eagle River, AK 99577

Cook Inlet Region Incorporated.
2525 C Street, Suite 300
Anchorage, AK 99507

Municipality of Anchorage
P.O. Box 196650
Anchorage, AK 99519

ARRC
327 West Ship Creek Avenue
P.O. Box 107500
Anchorage, AK 99510-7500



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Transportation
and Public Facilities**

DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL

PO Box 196900
Anchorage, Alaska 99519-6900
Main: 907.269.0542
Toll Free: 800.770.5263
TDD: 907.269.0473

In Reply Refer To:

Seward Highway MP 105-107, Windy Corner Safety Improvements

Project No. NH-0A3-1(34) / 56631

No Historic Properties Affected

December 16, 2015

ATTENTION: This finding contains one DOE

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has assumed the responsibilities of the Federal Highway Administration under 23 U.S.C. 326, and is proposing to realign and construct safety improvements to the Seward Highway between Milepost (MP) 105 and 107 in the Windy Corner area. The project limits are shown on Figures 1-3, the Project Location and Vicinity Map, Project Plan View, and Area of Potential Effect. The proposed project is located within Sections 1, 2, and 3, T 10N, R 2W, Section 6, T 10N, R 1W, and Sections 32 and 33, T 11N, R 2W, Seward Meridian, on USGS Quad Seward D-7 NW, at Latitude 60.984 and, Longitude -149.610.

Consultation for this project is being conducted in accordance with the 2014 *Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*. Through the Agreement, the DOT&PF will conduct the Section 106 process for Federal-Aid Highway Program projects. The DOT&PF finds that no historic properties would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

DOT&PF previously received concurrence from SHPO on February 6, 2015. This letter addresses an expansion of the APE to include Material Site 6.

Project Description

The project component consists of development of an additional material site (MS6) near MP 104 (Figure 4, Figures 4&5 of the report). MS6 would be developed only if MS1 is found to have insufficient quantity or quality of material for construction.

Area of Potential Effect

The Area of Potential Effect (APE) for the proposed Windy Corner Project Material Site 6 is located between MP 104 and MP 105 on the Seward Highway, within Section 1, T 10N, R 2W and Section 6, T 10N R 1W, Seward Meridian on USGS Quad Seward D-7 NW (Figure 4) with an area of 21.75 acres.

Identification Efforts

A review of the Alaska Heritage Resources Survey (AHRS) database identified one recorded property in the MS6 expanded APE. A survey completed in March 2015 identified one additional cultural resource in the APE. There are no properties currently listed on the NRHP within the MS6 section of the APE.

AHRS Site Number	Property Description	Period
SEW-00566	Potter Connecting Trail, part of the historic Iditarod Trail. Recorded in 1986, its exact location has not been ascertained. No DOE or nomination has been completed for this site.	Historic
SEW-01579	Can dump. This site consists of three buckets, five plates, an enameled basin, and two large metal pieces, one of which is a remnant of a wood stove.	Historic

Determination of Eligibility

The Potter Connecting Trail (SEW-00566/ANC-00279) may exist in remnant form within the APE. However, identification efforts were unable to positively identify the trail. It is very likely the trail was the railroad grade and use was discouraged once the track was completed to Anchorage and dog teams were banned from the right of way in Circular 265 and further warned away in Circular 349, published in the Alaska Railroad Record (Alaska Railroad Record Volume 1, No. 51, October 1917; Volume III No. 4, 1918).

SEW-01579 is interpreted to be the remains of an historic-era camp. Although it may be associated with gold mining at the nearby Indian Valley Mine, it is equally possible it is associated with construction of the railroad, or the more recent power line corridor (Figure 5). The site lacks material or historical evidence to make a firm association with any of the contexts. The site is not associated with a notable or significant person whose specific contributions to history can be identified or documented. SEW-01579 does not embody the distinctive characteristics of a type, period, or method of construction, the work of a master, possess high artistic values, or represent significant or distinguishable entities whose components may lack individual distinction. The site is not eligible for the NRHP under Criteria A, B, or C. SEW-01579 is generally lacking in integrity and in my opinion does not possess sufficient historic or archaeological materials to make it likely to yield archaeological or historical data important to the history of the Turnagain Arm region (see attached Determination of Eligibility). Therefore, SEW-01579 is not recommended as eligible for the NRHP under Criterion D.

Finding of Effect

The previously assessed Material Site 1 is anticipated to provide sufficient material for the project. Should it become necessary, this proposed action would seek to excavate construction grade substrate from Material Site 6. The DOT&PF finds there are no historic properties present within the expanded APE for potential Material Site 6 for the Seward Highway MP 105-107, Windy Corner Safety Improvements project.

Consultation Efforts

Consultation was initiated for this project on September 26, 2013. The following consulting parties are being notified of this finding: the State Historic Preservation Officer (SHPO); ARRC; Native Village of Eklutna; Municipality of Anchorage; Cook Inlet Regional Corporation, Inc.; and Eklutna, Inc.

If you have questions or comments related to this proposed project, I can be reached at the address above, by telephone at 907-269-0534, or by e-mail at erik.hilsinger@alaska.gov.

We request your input on our proposal so that we can incorporate your concerns into project development. Your timely response will greatly assist our compliance efforts and the preparation of any required environmental documentation. For that purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,



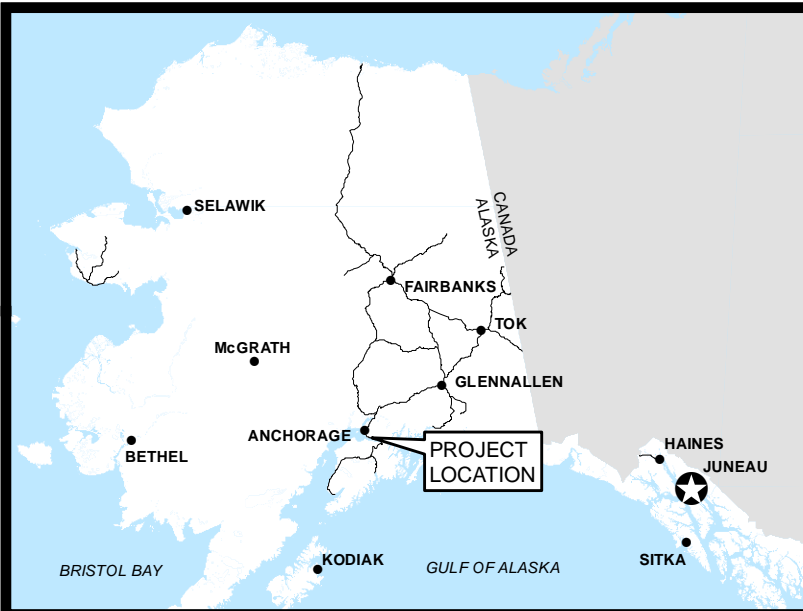
Erik D. Hilsinger
Cultural Resources Specialist
Central Region DOT&PF

Enclosures:

Figure 1: Location and Vicinity Map
Figure 2: Project Plan View
Figure 3: APE
Figure 4: Material Site 6 expanded APE
Figure 5: SEW-01579
Cultural Resources Investigation for the Seward Highway MP 105-107, Windy Corner Safety
Improvements Material Site 6 (DOT&PF Project No. 56631)
Determination of Eligibility for SEW-01579, September 2015

Electronic cc w/ enclosures:

Tom Schmid, P.E., DOT&PF Central Region, Project Manager
Brian Elliott, DOT&PF Central Region, Regional Environmental Manager
Mark Boydston, DOT&PF Central Region, Environmental Analyst
Laurie Mulcahy, DOT&PF Statewide Environmental Office, Cultural Resources Manager



Project Location and Vicinity Map

Sec 1,2 & 3 T10N R2W
 Sec 6 T10N R1W
 Sec 32 & 33 T11N R2W
 Seward Meridian, Alaska
 USGS Topo Maps Seward D-7 NW



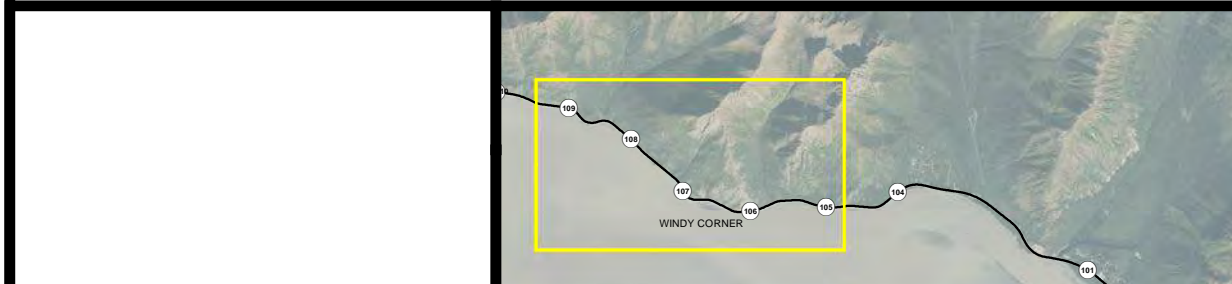
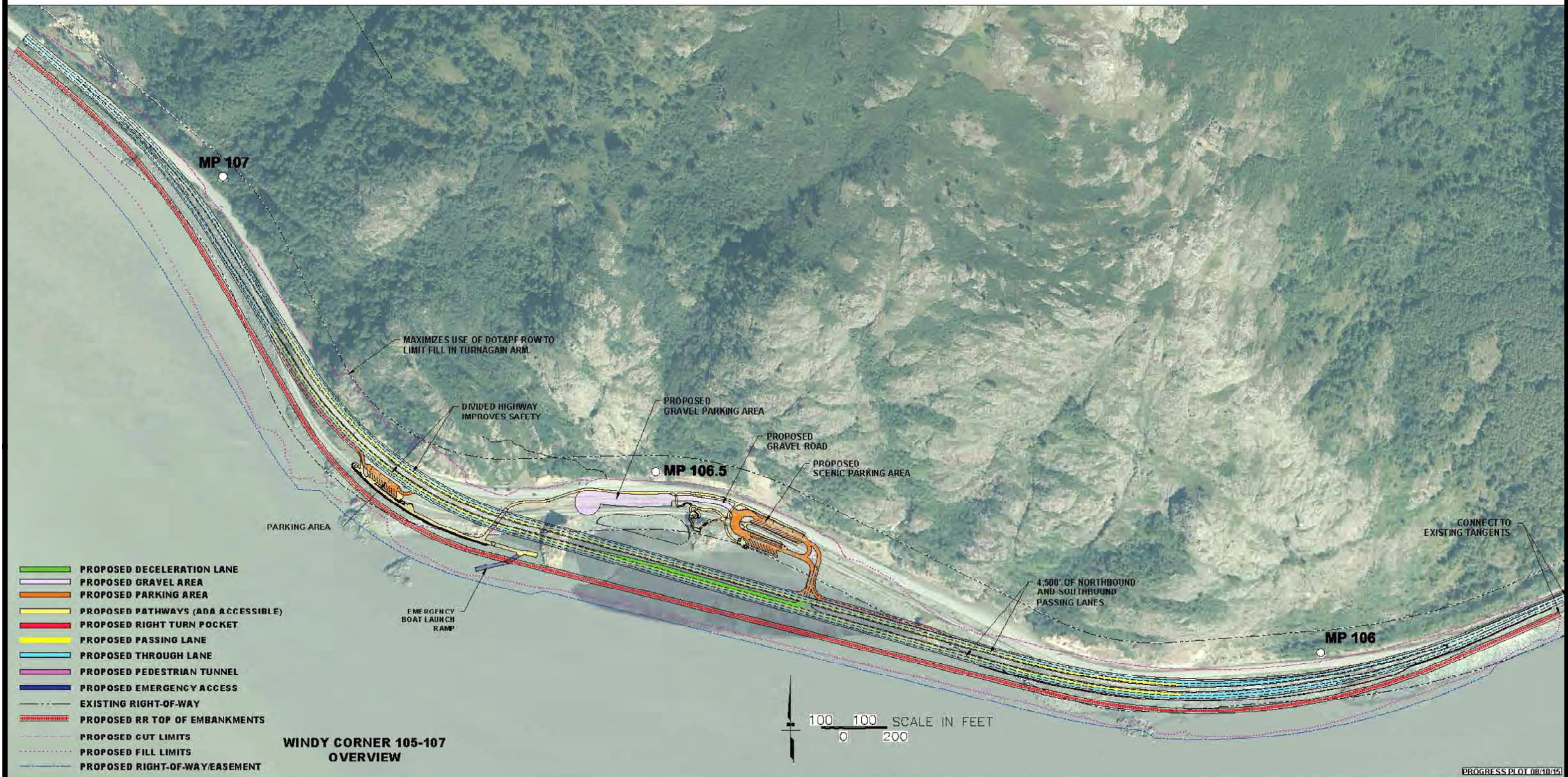
STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES

DOT & PF Project No. 0A3-1(34)/56631
 WINDY CORNER SEWARD HIGHWAY
 MILEPOST 105-107

Municipality of Anchorage, Alaska

August 20, 2015

FIGURE 1



Windy Corner 105-107 Project Plan View

S1,2 & 3 T10N R2W
S6 T10N R1W
S32 & 33 T11N R2W
Seward Meridian, Alaska



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

DOT&PF Project No. 0A3-1(34)/56631
WINDY CORNER SEWARD HIGHWAY
MILEPOST 105-107

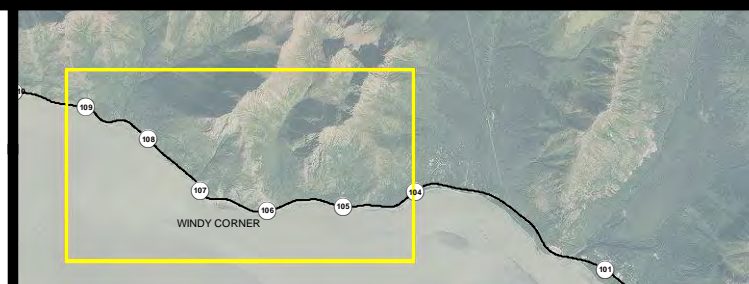
Municipality of Anchorage, Alaska

September 24, 2015

FIGURE 2



- # Milepost
- Seward Highway
- Railroad
- APE



Area of Potential Effect

S1,2 & 3 T10N R2W
 S6 T10N R1W
 S32 & 33 T11N R2W
 Seward Meridian, Alaska



STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES
 DOT & PF Project No. 0A3-1(34)/56631
 WINDY CORNER SEWARD HIGHWAY
 MILEPOST 105-107

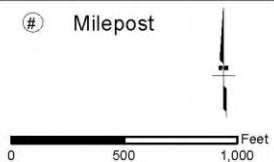
Municipality of Anchorage, Alaska

August 20, 2015

FIGURE 3



Milepost



**Seward Highway MP 105-107
Windy Corner Safety Improvements
Material Site 6 Area of Potential Effect**

S1 T10N R2W
S6 T10N R1W
Seward Meridian, Alaska



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES
DOT & PF Project No. 0A3-1(34)/56631
WINDY CORNER SEWARD HIGHWAY
MILEPOST 105-107

Municipality of Anchorage, Alaska

August 20, 2015

FIGURE 4



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Transportation
and Public Facilities**

DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN & ENVIRONMENTAL

PO Box 196900
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In Reply Refer To:
Seward Highway MP 105-107, Windy Corner Safety Improvements
Project No. NH-0A3-1(34) / 56631

No Adverse Effect

January 15, 2015

ATTENTION: This finding contains one DOE

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has assumed the responsibilities of the Federal Highway Administration under 23 U.S.C. 326, and is proposing to realign and construct safety improvements to the Seward Highway between Milepost (MP) 105 and 107 (also known as the Windy Corner area). The project limits are shown on the Project Location and Vicinity Map, Figure 1. The proposed project is located within Sections 1, 2, and 3, T 10N, R 2W, Section 6, T 10N, R 1W, and Sections 32 and 33, T 11N, R 2W, Seward Meridian, on USGS Quad Seward D-7 NW, at Latitude 60.984 and, Longitude -149.610.

Consultation for this project is being conducted in accordance with the 2014 *Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*. Through the Agreement, the DOT&PF will conduct the Section 106 process for Federal-Aid Highway Program projects. The DOT&PF finds no adverse effect on historic properties by the proposed project pursuant to 36 CFR 800.5(b), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(e).

Background

The Seward Highway is a National/State Scenic Byway and an All American Road, and is the only overland access to communities south of Anchorage, the Kenai Peninsula, and the Alaska Marine Highway System at Whittier. The two-lane highway supports heavy commercial, recreational, and residential traffic. According to the DOT&PF 2011 Annual Traffic Volume Report, annual average daily traffic volumes in the corridor were estimated at 10,156 vehicles, with the heaviest traffic volumes reported at more than 22,000 vehicles per day during peak summer days. The segment from Anchorage to Girdwood is one of four designated Safety Corridors in Alaska due to an elevated rate of fatal/major injury crashes in the corridor. Traffic operations in the segment of highway from MP 105 to 107 are frequently disrupted by motorists decelerating and parking along the highway shoulder to view wildlife. This creates a high differential in speeds between motorists

traveling through the corridor quickly and those that are sightseeing. This differential in speeds and uncontrolled movement of traffic entering and exiting the highway contributes to the elevated crash rate in the corridor (*Seward Highway Motor Vehicle Crash Statistics and Evaluation*, 2009, Ron Martindale, DOT&PF, and *Safety Corridors Annual Review, 2010, 2011, and 2012*, DOT&PF). To improve safety, the road alignment would be changed to improve sight distance and better accommodate the posted 55 mph speed limit.

Project Description

The project consists of:

- The acquisition of new right-of-way (ROW) consistent with the realignment and construction of a divided two-lane highway from MP 105.75 to 107.50 of the Seward Highway (Figure 2). The proposed acquisition ROW would comprise 29.9 acres.
- Development of a material site (MS1) at MP 109 to excavate construction grade substrate for the realignment. The material site would be located off the project area with direct access adjacent from the Seward Highway (Figure 4). The acquisition of additional ROW would comprise 19.6 acres, measuring 1900 feet at maximum length and 700 feet at maximum width.
- Realignment and reconstruction of Alaska Railroad Corporation (ARRC) tracks for approximately two miles between MP 105.75 and 107.50 (Figure 5).
- Improvements to existing pullouts/parking areas and construction of the new pullout and parking area at Gorilla Rock (MP 106.50; Figures 2 and 3) would be implemented on both sides of the highway to reduce motorists parking on the highway shoulder for wildlife viewing.
- Acceleration and deceleration lanes to access the pullouts/parking areas would be constructed.

Area of Potential Effect

The direct area of potential effect (APE) for the project includes the highway and ARRC tracks from MP 105.75 to 107.50, as well as the proposed material site at MP 109 (Figures 6 and 7). The boundary of the direct APE includes an additional 650 feet north of the existing highway and south of the proposed ARRC track realignment at Gorilla Rock. This direct APE boundary captures potential effects from the construction activities for the project footprint cut and fill limits and material site areas. The indirect APE takes into account the visual effect of the rock cuts along the road corridor, the material site, and the new proposed turnout and scenic parking area at Gorilla Rock. It also includes areas above new rock cuts where identified cultural resources could be impacted by erosion (Figure 8).

Identification Efforts

A review of the Alaska Heritage Resources Survey (AHRS) database identified seven recorded properties in the vicinity of the proposed project (Figures 7 and 8). Surveys completed in 1976, 2001, and 2009 identified cultural resources in the APE and vicinity.¹ Many of the sites identified in the 1976 survey no longer exist. Reger (2001a and b) specifically noted several areas that were so steep that there was a remote probability of

¹ Reger, Douglas R. and Joan M. Antonson

1976 Potter-Girdwood Archaeological and Historic Site Survey. In: *Archaeological Projects, 1976*. Miscellaneous Publications, History and Archaeology Series, No. 16. OHA, Alaska Division of Parks and Outdoor Recreation, DNR, Anchorage.

Reger, Douglas R.

2001a *Archaeological and Historic Site Survey Along the Seward Highway, Mile 99 to Mile 105*, for the Alaska DOT&PF, Seward Highway Bird Point to Potter Marsh Passing Lane and Pathway Project. Reger Archaeological Consulting, Anchorage.

2001b *Archaeological and Historic Site Survey Along the Seward Highway, Mile 105 to Mile 115*, for the Alaska DOT&PF, Seward Highway Bird Point to Potter Marsh Passing Lane and Pathway Project. Cultural Resource Consultants, LLC and URS. Reger Archaeological Consulting, Anchorage.

Yarborough, Michael R., Shawna M. Rider, and Catherine L. Pendleton

2009 *Archaeological Field Survey of Proposed Alternatives for the Improvement of the Seward Highway from Mile Post 99 to 105*. Cultural Resource Consultants LLC, Anchorage.

finding cultural remains. These areas included MP 106.2 to 106.7 in the APE of the proposed project. Limited pockets of accessibility interspersed in between rock bluffs were examined by Reger, including MP 108.9-109.4, 109.5-110.0. No cultural remains were identified during that effort.

A June 2004 Categorical Exclusion Checklist for Seward Highway Safety Improvements Indian to Potter Marsh, MP 105 to MP 115 (Project Number 56631, Federal NH-0A3-1(25)) included SHPO correspondence regarding the recorded sites and the results of Reger's 2001 survey. DOT&PF, in consultation with SHPO in 2013 deemed these surveys sufficient for the proposed APE.

Additional research was carried out in the Alaska Railroad office where original alignment maps and administrative records were examined.

AHRS Site Number	Property Description	Period
SEW-00131	Lithic scatter, flakes of chert and a chipped, stemmed projectile point. The artifacts were not found in geological context nor in situ, and the site has been determined not eligible. This site is located inside the direct APE.	Prehistoric
SEW-00029/ ANC-04057	Turnagain Arm of the Alaska Railroad. SEW-00029 was assigned to the entirety of the railroad system in Alaska. ANC-04057 was assigned for the 36.6-mile Turnagain Arm District of the Alaska Railroad. The tracks are within the direct APE.	Historic
SEW-00113	Falls Creek Cabin. The site lacks integrity and has been determined not eligible. It lies outside of the direct/indirect APE.	Historic
SEW-00566	Potter Connecting Trail, part of the historic Iditarod Trail. Recorded in 1986, its exact location has not been ascertained. No DOE or nomination has been completed for this site. It lies outside of the direct/indirect APE.	Historic
ANC-00112	Rainbow Creek Sluice Box. The site was recorded in 1976 and was destroyed some time prior to 1983. It lies outside of the direct/indirect APE.	Historic
ANC-00113	Rainbow Camp/Camp 94 was the site of an AKRR construction camp. This site has been partially destroyed, and lies outside of the direct/indirect APE.	Historic
ANC-04069	The Seward Highway. No DOE or nomination has been completed for this site. The highway is located in the direct APE, but is exempt from Section 106 review.	

Determination of Eligibility

A determination of eligibility (DOE) has been prepared (enclosed) for the Turnagain Arm District of the Alaska Railroad (ANC-04057), in coordination and with assistance from the ARRC (*Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057)*, August 2014, Cultural Resource Consultants LLC, enclosed). The assessment looked specifically at the Portage to Potter corridor segment, called the Turnagain Arm District in the ARRC archival documents. The corridor is 36.6 miles of historic-age railbed. The period of significance has been identified as 1916 to 1964, from construction to reconstruction and rehabilitation following the Good Friday Earthquake.

Character-Defining Features:

The character-defining feature of the Turnagain District of the Alaska Railroad corridor is the 36.6 miles of historic-age railbed. This includes a roadway, which is the portion of the ROW modified to support the tracks. Structural elements of the roadway include cuts, fills, and grades; a railroad bed; ballast; steel tracks on wood ties, and ditches. The ANC-04057 is a single set of tracks with five passing sidings that average 6.8 miles apart. Three bridges from the period of significance still exist. No other associated support buildings/structures remain within the Turnagain Arm District.

Integrity Considerations

- *Location:* Except for a roughly 1.5-mile realignment through Bird Flats, the corridor generally conforms to the alignment of the mid-1960s.
- *Design and Materials:* There have been physical changes, but the track structure retains the basic features necessary to convey its historic function and configuration. Physical elements of the railroad (including rails, ties, ballast, and other track components) have been altered and upgraded. All of the rail, ties, and ballast have been replaced or upgraded since 1964 with in-kind materials that are consistent with the railroad's overall function.
- *Setting:* The character of place associated with its historic role has been retained.
- *Workmanship:* Even though new materials have been used, the form and assembly techniques have not changed since its period of significance.
- *Feeling and Association:* The railroad still conveys the feeling of a historic period mode of transportation and is directly linked with historic events associated with opening up interior Alaska for sustained development and movement of people and resources.

The DOT&PF has determined that the Turnagain Arm District of the Alaska Railroad (ANC-04057) is eligible for the National Register of Historic Places under Criterion A for a significant and demonstrable association with transportation, economic development, and settlement. The railroad opened a region of Alaska with few roads or navigable rivers to settlement and development.

Finding of Effect

The proposed action would realign approximately 2.0 miles of the 36.6-mile corridor, moving the corridor a maximum 425 feet from its current alignment at the proposed Gorilla Rock parking area and turnout. The grade of the railroad would remain below and parallel to the existing highway, and continue to follow along the shoreline of the Turnagain Arm. The reconstructed single track railroad would contain the same basic features as before, but with replacement in-kind materials. This action would not involve the three bridges or the five passing sidings.

Integrity Assessment

- *Location:* The railroad alignment shift would be minor and the railroad would conform to its general alignment from its period of significance.
- *Design and Materials:* The reconstructed railroad would retain features necessary to convey its historic function and configuration of the roadway (including the rails, ties, ballast, ditches, and other track components). The use of in-kind materials is consistent with replacement and upgrade work throughout the railroad corridor.
- *Setting:* The character of place associated with its historic role has been retained. There is presently a turnout/parking area above the railroad at the Gorilla Rock location. The rock cuts at the proposed material site would be commensurate with previous cuts made during the construction and maintenance of the Seward Highway.

- *Workmanship:* Even though new materials have been used, the form and assembly techniques have not changed since its period of significance.
- *Feeling and Association:* The railroad will still convey the feeling of a historic period mode of transportation, the proposed action will not change its connections or its direct links with historic events.

The DOT&PF finds the Seward Highway MP 105-107, Windy Corner Safety Improvements project would have no adverse effect on the Turnagain Arm District of the Alaska Railroad (ANC-04057).

It is FHWA's intent to make a Section 4(f) *de minimis* impact finding premised on your written concurrence that the project would not adversely affect the Turnagain Arm District of the Alaska Railroad (ANC-04057).

Consultation Efforts

Consultation was initiated for this project on September 26, 2013. The following consulting parties are being notified of this finding: the State Historic Preservation Officer (SHPO); ARRC; Native Village of Eklutna; Municipality of Anchorage; Cook Inlet Regional Corporation, Inc.; and Eklutna, Inc.

The DOT&PF also met and coordinated with the ARRC and SHPO staff to discuss the railroad and its DOE. The ARRC provided comments and additional materials for background research, and reviewed the draft DOE material. No input was received from the other consulting parties.

Please direct your concurrence or comments to me at the address above, by telephone at 907-269-6229, or by e-mail at laurie.mulcahy@alaska.gov.

Sincerely,



Laurie Mulcahy
Statewide Environmental Office
Cultural Resources Manager

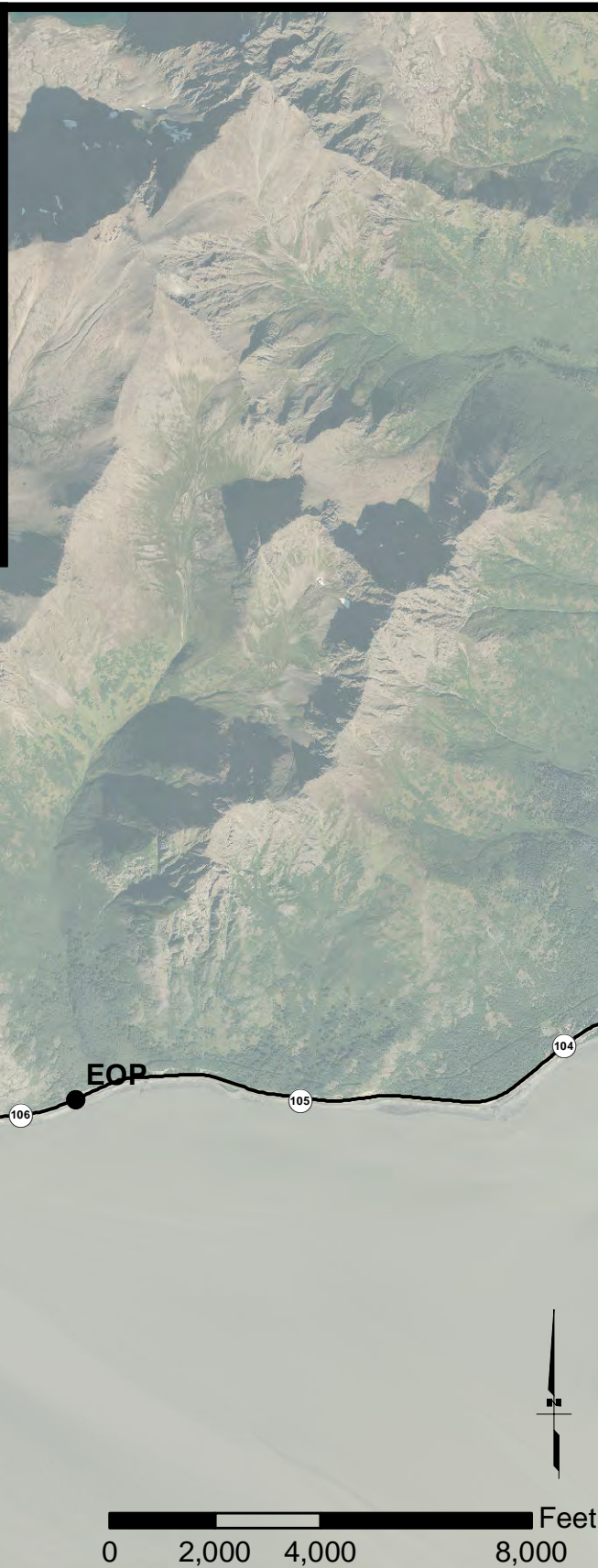
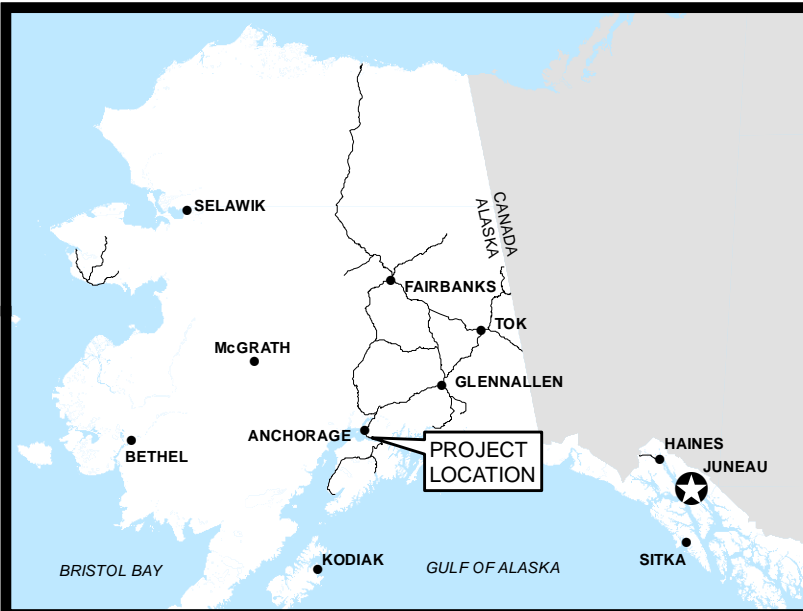
Enclosures:

- Figure 1: Location and Vicinity Map
- Figure 2: Project Plan View
- Figure 3: Project Typical Section at Gorilla Rock
- Figure 4: Material Site 1, Plan and Section Views
- Figure 5: Alaska Railroad Realignment, Plan View
- Figure 6: APE Map – Aerial
- Figure 7: APE Map – Topographic
- Figure 8: APE Map – Indirect

Determination of Eligibility for the Turnagain Arm District of the Alaska Railroad (ANC-04057),
August 2014

Electronic cc w/ enclosures:

- Tom Schmid, P.E., DOT&PF Central Region, Project Manager
- Brian Elliott, DOT&PF Central Region, Regional Environmental Manager
- Mark Boydston, DOT&PF Central Region, Environmental Analyst
- Tim Haugh, FHWA Alaska Division, Environmental Program Manager



Project Location and Vicinity Map

Sec 1,2 & 3 T10N R2W
 Sec 6 T10N R1W
 Sec 32 & 33 T11N R2W
 Seward Meridian, Alaska
 USGS Topo Maps Seward D-7 NW



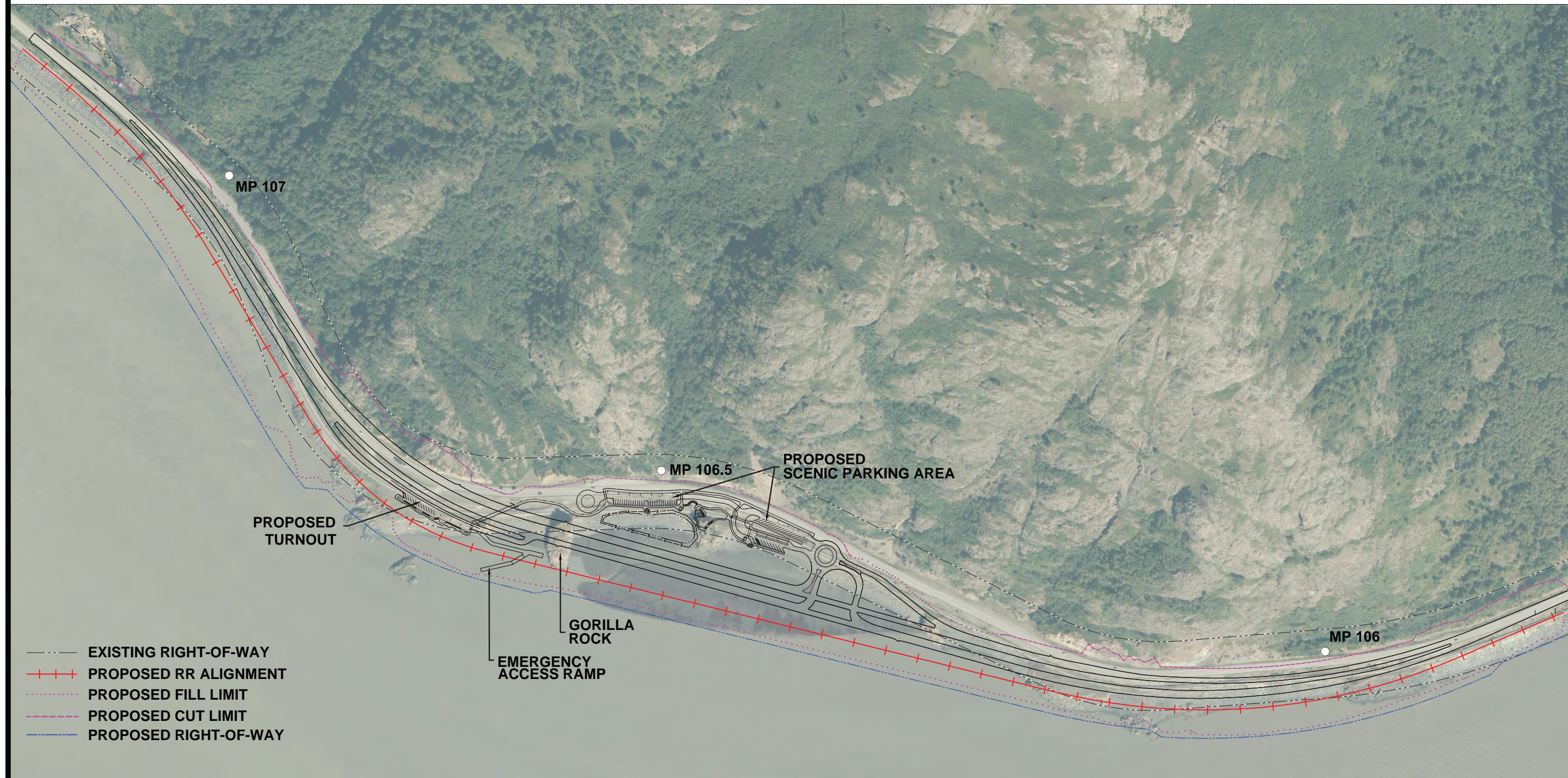
STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES

DOT & PF Project No. 0A3-1(34)/56631
 WINDY CORNER SEWARD HIGHWAY
 MILEPOST 105-107

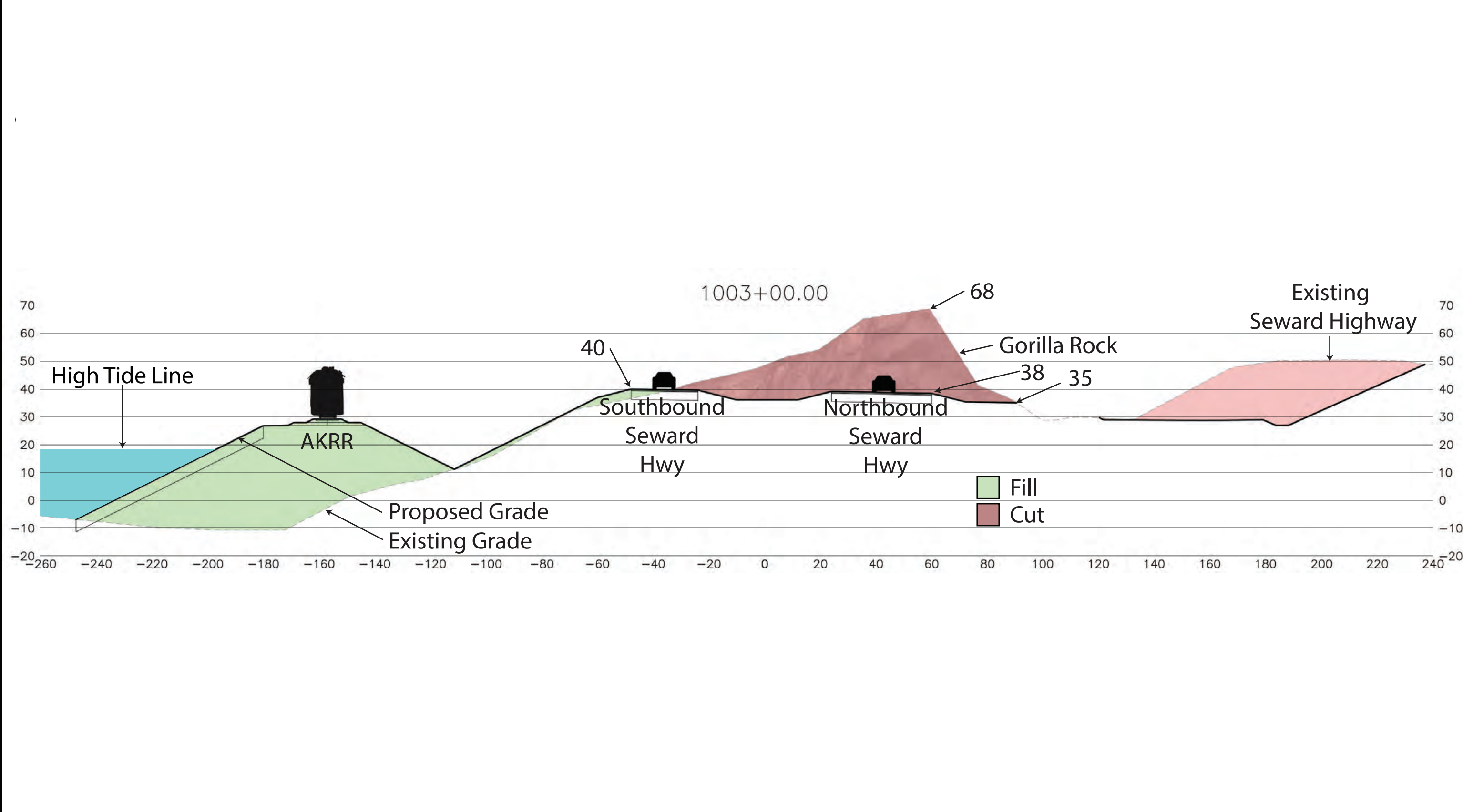
Municipality of Anchorage, Alaska

January 06, 2015

FIGURE 1



		<p align="center">Windy Corner 105-107 Project Plan View</p> <hr/> <p align="center">S1,2 & 3 T10N R2W S6 T10N R1W S32 & 33 T11N R2W Seward Meridian, Alaska</p>		<table border="1"> <tr> <td align="center" colspan="2"> STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES </td> </tr> <tr> <td align="center" colspan="2"> DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107 </td> </tr> <tr> <td align="center" colspan="2"> Municipality of Anchorage, Alaska </td> </tr> <tr> <td> DATE: January 14, 2015 </td> <td> FIGURE 2 </td> </tr> </table>	STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES		DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107		Municipality of Anchorage, Alaska		DATE: January 14, 2015	FIGURE 2
STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES												
DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107												
Municipality of Anchorage, Alaska												
DATE: January 14, 2015	FIGURE 2											



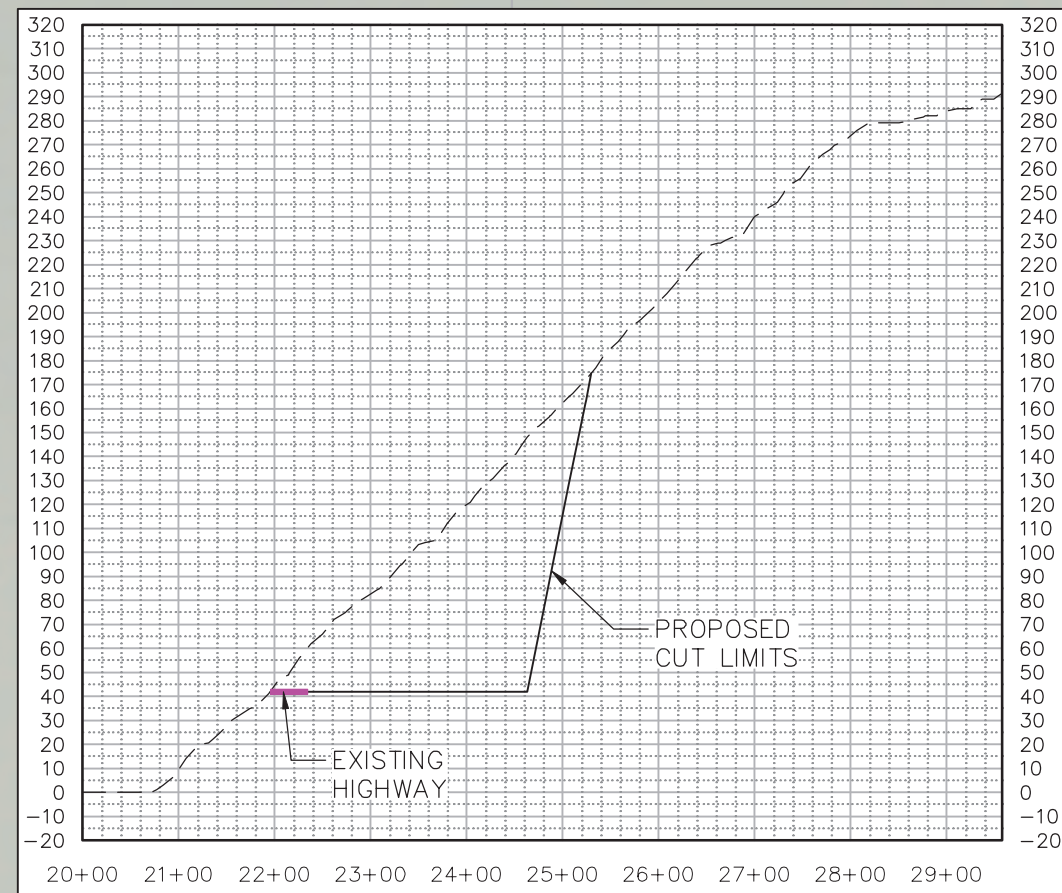
Windy Corner 105-107
Project Typical Section at Gorilla Rock

S1,2 & 3 T10N R2W
S6 T10N R1W
S32 & 33 T11N R2W
Seward Meridian, Alaska



STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES	
DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107	
Municipality of Anchorage, Alaska	
DATE: January 14, 2015	FIGURE 3

MATERIAL SITE 1



100 0 100 200
SCALE IN FEET



Windy Corner 105-107 Material Site 1, Plan and Section Views

S1,2 & 3 T10N R2W
S6 T10N R1W
S32 & 33 T11N R2W
Seward Meridian, Alaska

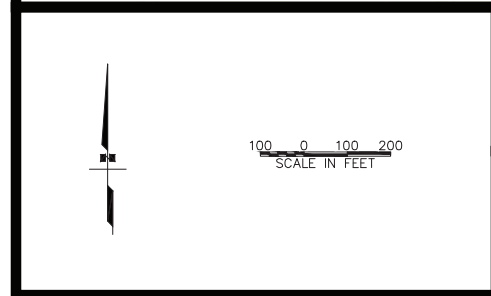
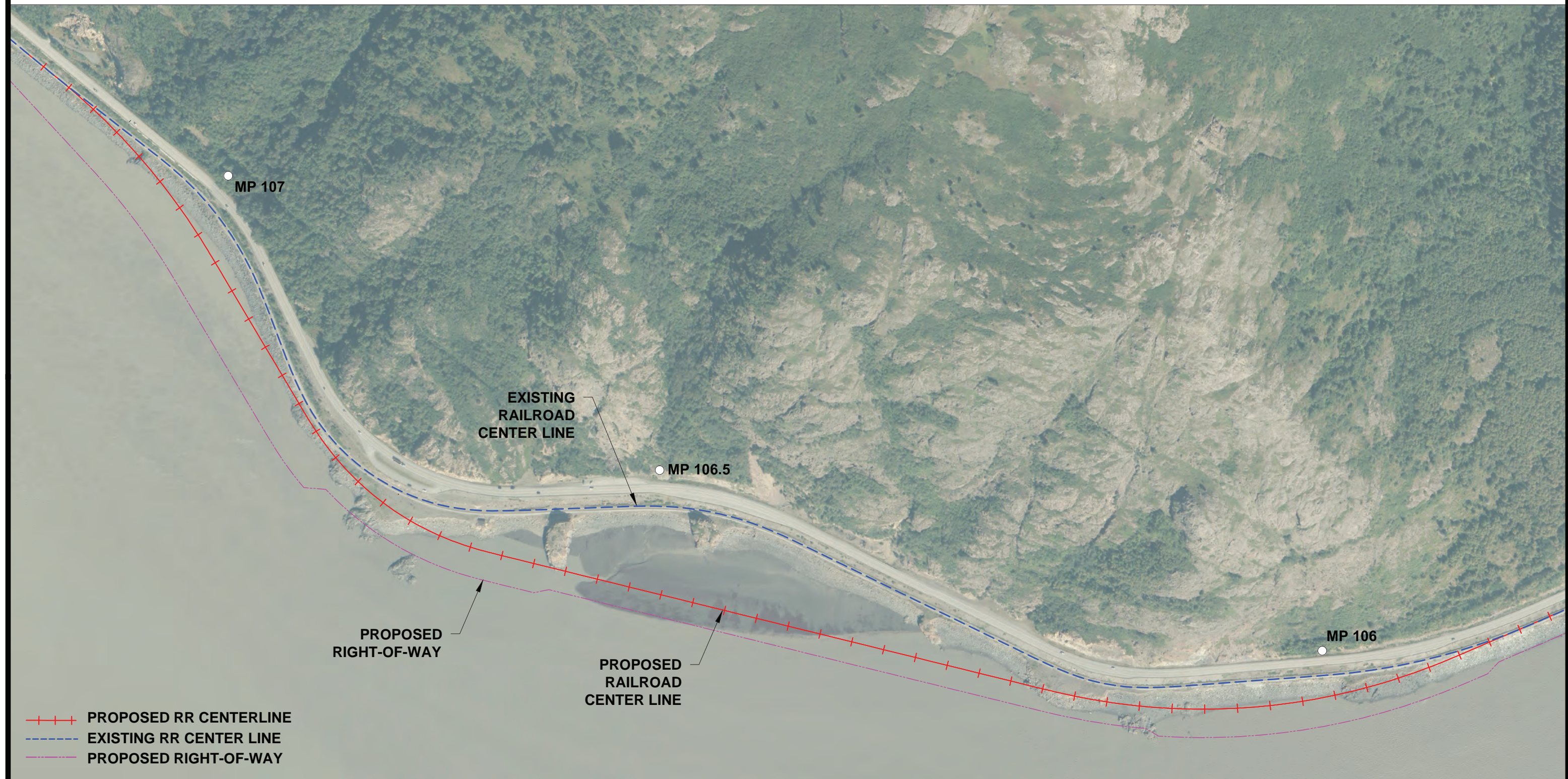


STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES
DOT & PF Project No. 0A3-1(34)/56631
WINDY CORNER SEWARD HIGHWAY
MILEPOST 105-107

Municipality of Anchorage, Alaska

DATE: January 14, 2015

FIGURE 4

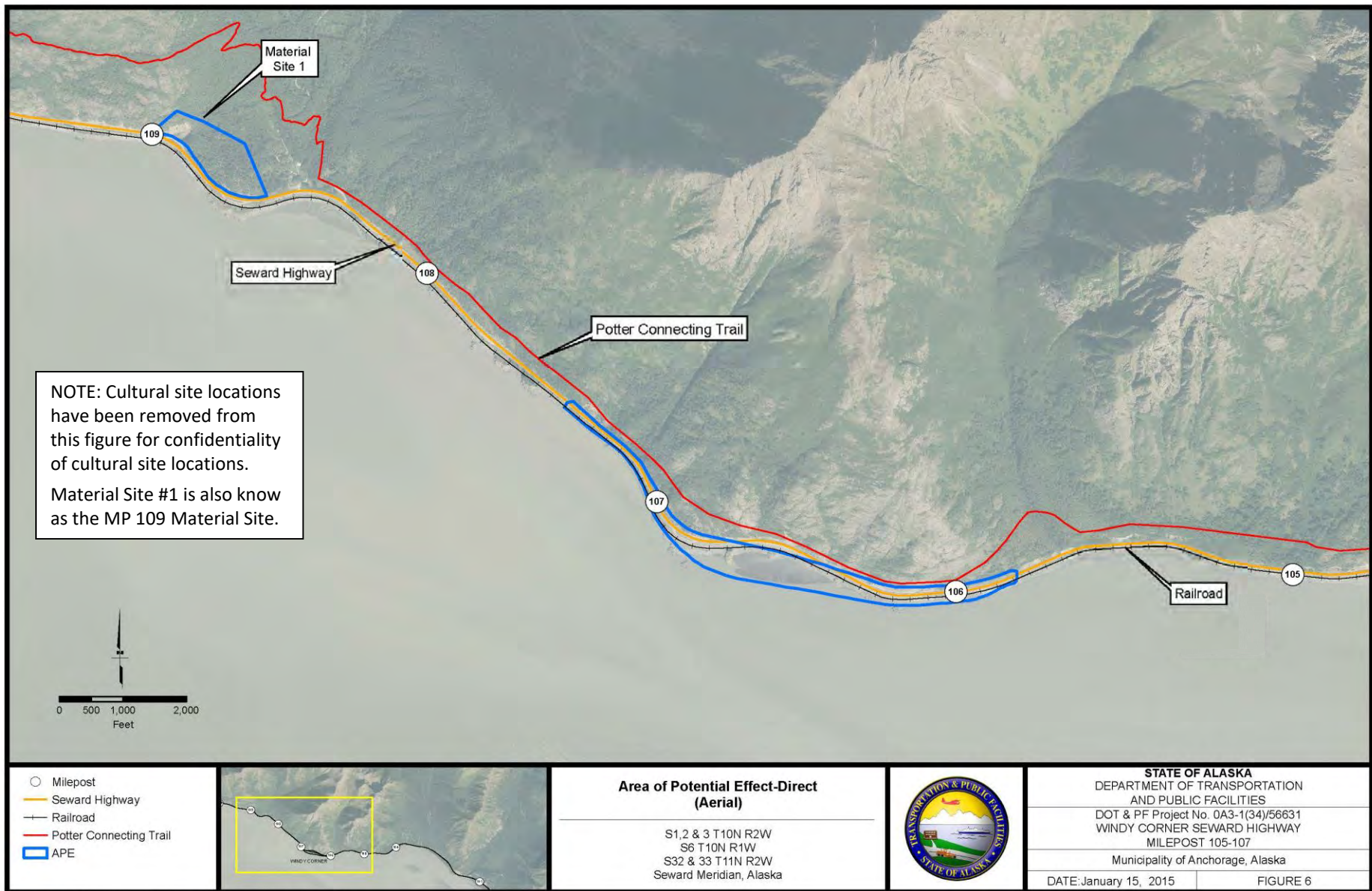


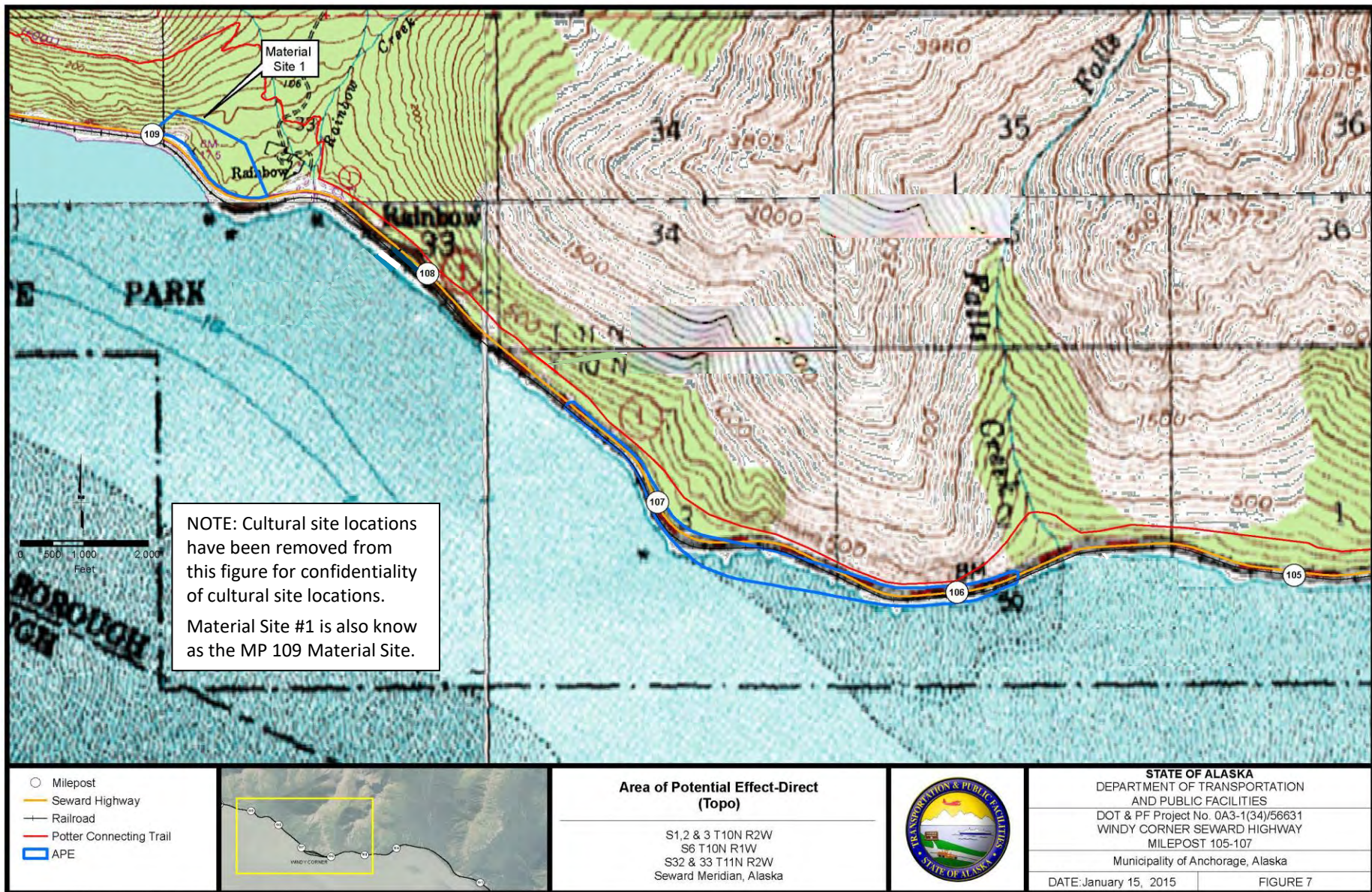
**Windy Corner 105-107
Alaska Railroad Realignment, Plan View**

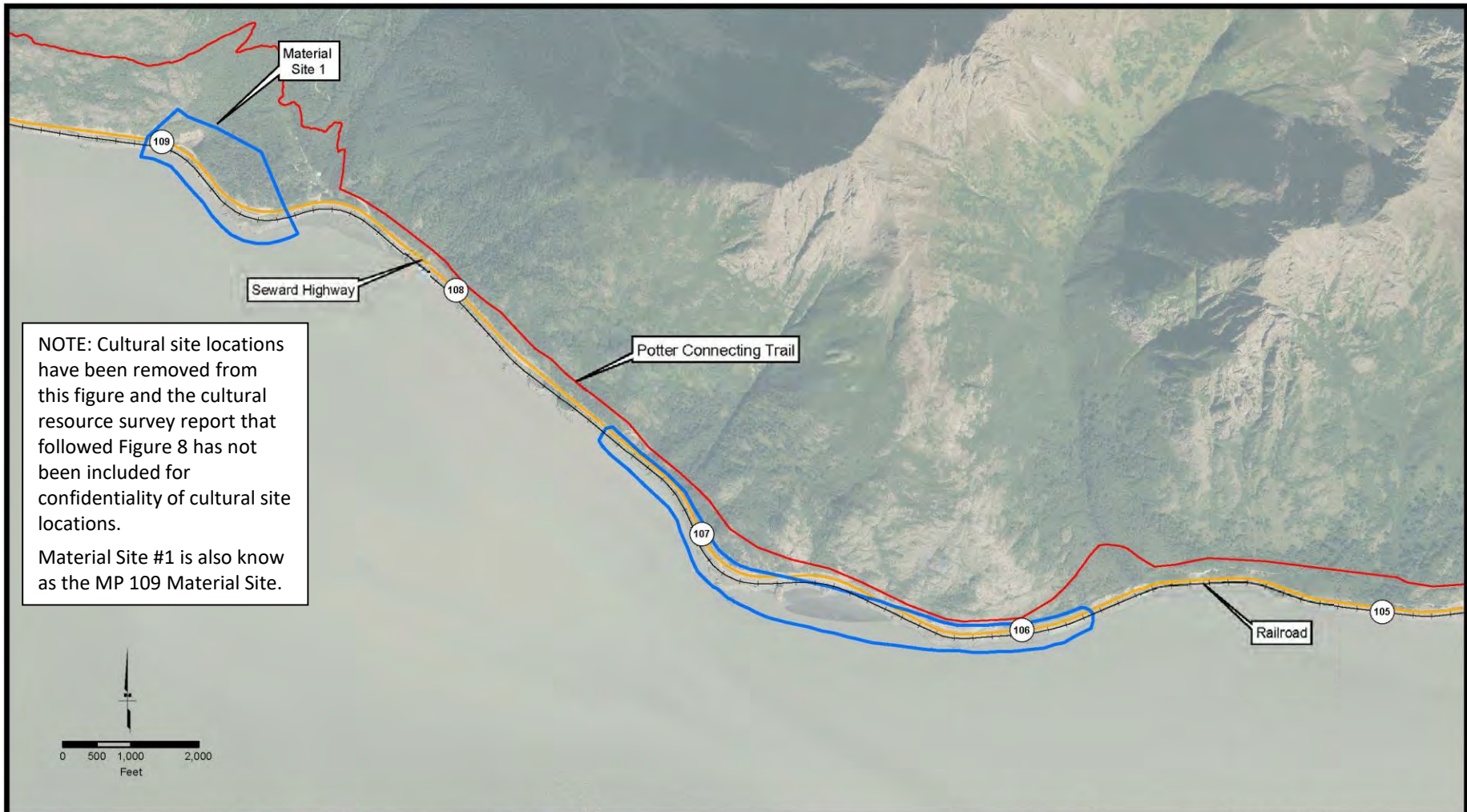
S1,2 & 3 T10N R2W
S6 T10N R1W
S32 & 33 T11N R2W
Seward Meridian, Alaska



STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES	
DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107	
Municipality of Anchorage, Alaska	
DATE: January 14, 2015	FIGURE 5







<ul style="list-style-type: none"> ○ Milepost — Seward Highway — Railroad — Potter Connecting Trail ■ APE 		<p align="center">Area of Potential Effect-Indirect (Aerial)</p> <p align="center">S1,2 & 3 T10N R2W S6 T10N R1W S32 & 33 T11N R2W Seward Meridian, Alaska</p>		<p align="center">STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES DOT & PF Project No. 0A3-1(34)/56631 WINDY CORNER SEWARD HIGHWAY MILEPOST 105-107 Municipality of Anchorage, Alaska</p> <p>DATE: January 15, 2015 FIGURE 8</p>
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U.S. Department
of Transportation
**Federal Highway
Administration**

Alaska Division

September 26, 2013

P.O. Box 21648
Juneau, AK 99802-1648
(907) 586-7418
(907) 586-7420
www.fhwa.dot.gov/akdiv

In Reply Refer To:
NH-0A3-1(034)/56631

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501

Dear Ms. Bittner:

The Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Highway Administration (FHWA), is proposing to realign and construct highway safety improvements to Seward Highway between Mileposts (MP) 105 and 107 (also known as the Windy Corner area). Improvements would bring the highway up to current geometric design standards and improve parking/wildlife viewing areas within the corridor. The project begins at 60.983 Latitude and -149.555 Longitude and terminates at 60.984 Latitude and -149.610 Longitude in Section 1, T10N, R2W and Section 6, T10N, R1W, Seward Meridian (United States Geological Survey Quadrangle Seward D-7 and D-8, Figure 1). Figure 2 shows the proposed project Study Area.

For purposes of the National Historic Preservation Act, we are initiating this consultation with you to assist us in identifying historic properties that may be affected by the proposed project.

Background

This project is being developed with a combination of State and Federal funds. In 2004, FHWA approved a Categorical Exclusion (CE) for the proposed Seward Highway Safety Improvements, Indian to Potter Marsh, MP 105 to MP 115. Recent consultation with FHWA concluded re-evaluating the 2004 CE is the appropriate level of environmental documentation. The CE re-evaluation will take into account changes in the proposed action, alternatives considered, affected environment, environmental consequences, and proposed mitigation. The State Historic Preservation Officer (SHPO) concurred with a finding of no adverse effect for this project on October 16, 2003. A copy of the findings letter is enclosed for your reference. The Study Area referenced in the 2003 findings letter (MP 105 to 115) includes the currently proposed project limits from MP 105 to 107.

Project Description

Seward Highway is a National/State Scenic Byway and an All American Road, and is the only overland access to communities south of Anchorage, the Kenai Peninsula, and the Alaska Marine Highway System at Whittier. The highway supports heavy commercial, recreational, and

residential traffic. According to the DOT&PF 2011 Annual Traffic Volume Report, annual average daily traffic volumes in the corridor were estimated at 10,156 vehicles, with the heaviest traffic volumes reported at more than 22,000 vehicles per day during peak summer days. The segment from Anchorage to Girdwood is one of four designated Safety Corridors in Alaska due to an elevated rate of fatal/major injury crashes within the corridor. Traffic operations in the segment of highway from MP 105 to 107 are frequently disrupted by motorists decelerating and parking along the highway shoulder to view wildlife. This creates a high differential in speeds between motorists traveling through the corridor quickly and those that are sightseeing. This differential in speeds and uncontrolled movement of traffic entering and exiting the highway contributes to the elevated crash rate in the corridor (*Seward Highway Motor Vehicle Crash Statistics and Evaluation, 2009*, Ron Martindale, DOT&PF, and *Safety Corridors Annual Review, 2010, 2011, and 2012*, DOT&PF). To improve safety, the road alignment will be changed to improve sight distance and better accommodate the posted 55 mph speed.

The project consists of:

- realignment and development of a divided 2-lane highway from MP 105 to 107
- relocation and realignment of Alaska Railroad Corporation (ARRC) tracks
- construction of pullouts/parking areas on both sides of the highway to reduce motorists parking on the highway for wildlife viewing
- construction of acceleration and deceleration lanes to access the new pullouts

The space created by the road and rail realignment would provide improved parking/turnout facilities with auxiliary lanes to accommodate traffic entering and exiting the highway.

Study Area

The study area, as shown on Figure 2, has two components – the proposed highway and railroad re-alignments and the proposed material sites. The proposed highway and railroad re-alignments extend from MP 105 to MP 107. The boundary for this component includes proposed cut and fill limits plus an additional 200-meter buffer extending north from the highway and south from the proposed ARRC track realignment. This boundary captures potential effects from the direct project footprint, potential blast areas, and areas within the project limits where cut slopes may erode hillside features. Also the boundary would allow for road or railroad re-alignment shifts during the final design phase.

The second component includes six proposed material sites. The proposed sites would not be larger than the shown boundaries if developed. Individual site development will depend on results from preliminary geotechnical investigations scheduled for this year and Chugach State Park permit conditions for construction. The 2004 CE for the MP 105 to 115 project included proposed material sites numbers 1, 3, and 5. DOT&PF revised the boundaries for these three sites for the proposed MP 105 to 107 project. On February 28, 2013, Valerie Gomez, DOT&PF Cultural Resources Specialist submitted an email describing preliminary geotechnical investigations for the six proposed material sites (enclosed).

The staging area has not yet been determined for this project. These areas will be identified by late summer 2013 with consultation from corresponding agencies. The Area of Potential Effect will be defined after comments are received from consulting parties.

Identification Efforts

Reger Archaeological Consulting conducted an archaeological survey in 2001 for the Seward Highway MP 105 – 115 CE. More recently, on February 22, 2012, DOT&PF researched the Alaska Heritage Resources Survey (AHRS) database to identify potential cultural resources within or near the project area. DOT&PF also researched the National Register of Historic Places (NRHP) database for any listed places were within or near the project area. The 2001 survey and recent AHRS and NRHP searches found the following identified resources within or near the project area:

AHRS # SEW-029 AK Railroad

A portion of the Alaska Railroad is within the project corridor and will be relocated as part of this project. A determination of eligibility has not been made for this site.

AHRS # SEW-113 Falls Creek Cabin (60.9851613 °N, 149.57722097 °W)

This site was determined not eligible in 2003 for lack of integrity of setting or material.

AHRS # SEW-131 Prehistoric Site (unnamed) (60.98499192 °N, 149.60856704 °W)

This site was determined not eligible in 2003 for lack of integrity.

AHRS # SEW-566 Potter Connecting Trail (60.98271586 °N, 149.59109787 °W)

Potter Connecting Trail is part of the National Historic Iditarod Trail as a connecting trail. A determination of eligibility has not been made for this site.

AHRS # SEW-412 Indian Valley Mine (60.985539 °N, 149.529507°W)

Indian Valley Mine represents early mining activity on Turnagain Arms sparsely settled north side during the years 1920-1939. The mine is located at MP 104, 0.6 miles east from proposed material site 6 eastern boundary. The mine is listed on the NRHP.

Under the Alaska Historic Roads Programmatic Agreement Interim Guidance, a group of Alaska roads has been identified which are being treated as eligible for the NRHP. This project does not affect any of these roads.

DOT&PF will be engaging a consultant to conduct a cultural resource survey to ensure all properties within the study area have been evaluated for NRHP eligibility.

Consultation Efforts

Interested parties being consulted during this Section 106 initiation effort include:

- Municipality of Anchorage/Anchorage Historic Preservation Commission
- Cook Inlet Region, Incorporated
- Eklutna, Incorporated
- Native Village of Eklutna
- ARRC

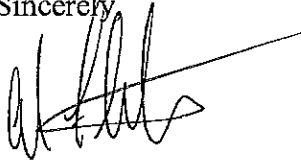
If you have questions or comments related to this proposed project, I can be reached at the address above, by telephone at (907) 586-7245 or by email at al.fletcher@dot.gov. However, I encourage you to include the DOT&PF Regional Environmental Manager so that your comments and concerns may be immediately directed to project development.

The point of contact is:

Brian Elliott
Regional Environmental Manager
DOT&PF
PO Box 196900
Anchorage AK 99519-6900
(907) 269-0539
brian.elliott@alaska.gov

We request your input on our proposal so that we can incorporate your concerns into project development. Your timely response will greatly assist our compliance efforts and the preparation of any required environmental documentation. For that purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,



Al Fletcher
Field Operations Engineer/Team Leader

Enclosures:

Figure 1: Location and Vicinity Map
Figure 2: Initial Study Area Boundary
2003 SHPO Concurrence with Determination of Eligibility & Findings of Effect
(for Seward Highway MP 105 to 115 project)
Preliminary geotechnical investigations email – February 28, 2013

Electronically cc w/o enclosures:

Tom Schmid, P.E., DOT&PF, Central Region, Project Manager
Brian Elliott, DOT&PF, Central Region, Regional Environmental Manager
Valerie Gomez, DOT&PF, Central Region, Cultural Resources Specialist
Laurie Mulcahy, DOT&PF, Statewide, Cultural Resources Manager



Location & Vicinity Map

Sec 1, T10N, R2W
Sec 6, T10N, R1W

Seward Meridian, Alaska

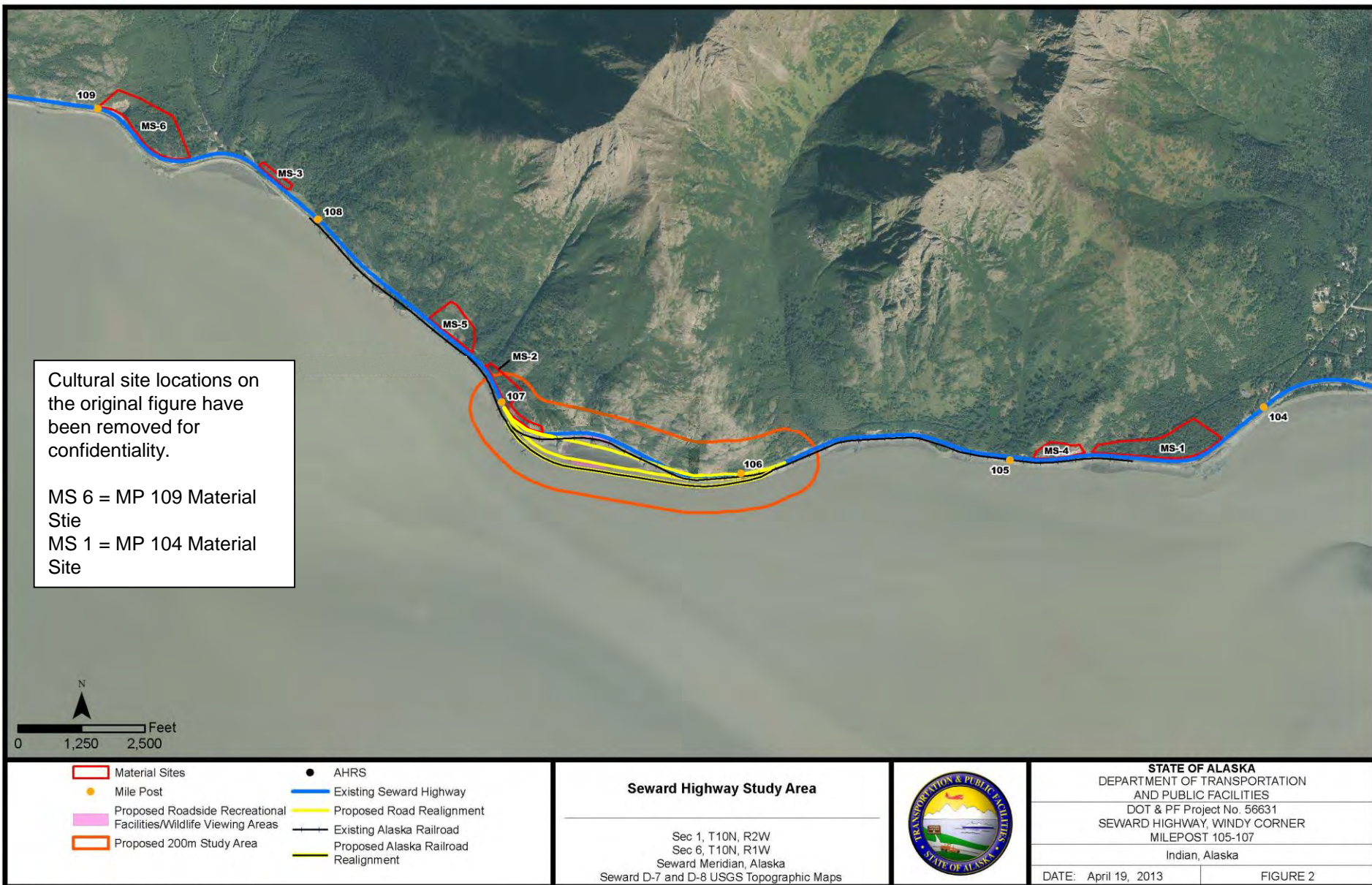


STATE OF ALASKA DEPARTMENT OF
TRANSPORTATION AND PUBLIC FACILITIES

DOT&PF Project No. 56631
Seward Highway MP 105-107, Windy Corner

DATE: February 20, 2013

Figure 1



STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN AND ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

PF
FRANK MURKOWSKI,
GOVERNOR

4111 AVIATION DRIVE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(FAX) 243-6927 - TDD 269-0473
(907) 269-0528 or (907) 269-0542

March 17, 2003

Project: Seward Highway Safety
Improvements, MP 105 – 115
Project No. 56631

Re: Determination of Eligibility & Effect

Judith Bittner
State Historic Preservation Officer
Alaska Department of Natural Resources - SHPO
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

Enclosed is a report entitled *Archaeological and Historic Site Survey along the Seward Highway, Mile 105 to Mile 115*. This survey was conducted by Dr. Douglas Reger for the Alaska Department of Transportation and Public Facilities. The purpose of the investigation was to identify significant archaeological and historic properties within this project's area of potential effects (APE). Most known sites in the project area were identified prior to this fieldwork and many sites identified during the mid-1970s no longer exist or are outside the APE.

Because of changes in the project since Dr. Reger's survey, only one of the sites described in the report—ANC-078—would be affected. A determination of eligibility for ANC-078 is included in Appendix 1 of Dr. Reger's report. Beluga Point (ANC-054), listed on the National Register of Historic Places in 1978, is immediately adjacent to, but outside of, the project limits.

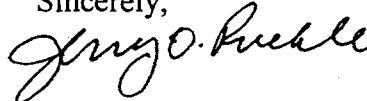
These two sites were discussed in a meeting on March 14, 2003 with Stefanie Ludwig, archeologist with your office; Susan Wick of my staff; Judy Dougherty, ADOT&PF Project Manager; Joyce Payne, URS Corporation; Douglas Reger, Reger Archaeological Consulting; and Michael Yarborough, Cultural Resource Consultants. Based on this discussion, the Department has determined that ANC-078 is eligible for the National Register and will be

C-141

adversely affected. The project will have no effect upon Beluga Point (No Historic Properties Affected) provided that access to the site is prohibited during the construction phase of the project to insure that the site is not inadvertently damaged.

The purpose of this letter is to ask your concurrence with the Department's findings of eligibility and effect. If you have any further questions regarding this project, please contact Michael Yarborough, at 349-3445 or Susan Wick, ADOT&PF Environmental Team Leader at 269-0530. Thank you for your assistance.

Sincerely,



Jerry O. Ruehle
Environmental Coordinator

JR/sw

Enclosure: Archaeological/Historic Site Survey

cc w/o enclosure: Judy Dougherty, P.E., Project Manager, Hwy Design, ADOT&PF
Joyce Payne, Senior Biologist, URS Corporation
Susan Wick, Environmental Team Leader, PD&E, ADOT&PF
Mike Yarborough, Archeologist, Cultural Resources Consultants

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

FRANK H. MURKOWSKI, GOVERNOR

550 W. 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8908

CENTRAL

April 10, 2003

File No.: 3130-2R DOT
3330-6 ANC-78
3330-6N SEW-113, SEW-131, ANC-124SUBJECT: Seward Highway Safety Improvements, MP 105-115
Project No. 55631Jerry Ruehle
Environmental Coordinator
Department of Transportation and Public Facilities
Statewide Design and Engineering Services
4111 Aviation Avenue
P. O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Ruehle:

We have reviewed your correspondence (3/17/2003) and maps (4/8/2003) regarding the referenced project in accordance with Section 106 of the National Historic Preservation Act. Based on the results presented in the archaeological survey report by Cultural Resource Consultants, we concur that ANC-78 is eligible for inclusion for the National Register under criterion D. We also concur that the Seward Highway Safety project will have an adverse effect on the site and look forward to the development of a memorandum of agreement addressing mitigation of the adverse effect.

We also concur that the project will have no effect on ANC-54 (Beluga Point) provided that access to the site is prohibited during construction. We recommend that the archaeologically sensitive areas be flagged off. We also request that Department of Transportation inform us if there are any design modifications in this area.

The archaeological survey report also addressed the National Register eligibility of three other sites: SEW-113 (Falls Creek Cabin and Camp), SEW-131 and ANC-124 (McHugh Wasteflake Site). We concur that all three of these sites are not eligible for the National Register.

Please contact Stefanie Ludwig at 269-8720 if you have any questions or if we can be of further assistance.

Sincerely,


Judith E. Birtner
State Historic Preservation Officer

JEB:sll

Post-it® Fax Note 7671		Date 4/29	# of pages 1
To Tara Howell	From Susan Wick		
Co./Dept. URS	Co. DOT		
Phone # 562-3366	Phone # 269-0530		
Fax # 562-1297	Fax # 243-6927		

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56631

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Coord. (1)	
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Central File	

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN AND ENVIRONMENTAL

FRANK H. MURKOWSKI, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
FAX (907) 243-6927 TDD 269-0473
(907) 269-0528 or (907) 269-0542

September 25, 2003

Project: Seward Hwy. Safety Improvements
MP 105 – 115
Project No. 56631

**Re: Determination of Eligibility & No
Effect; Clarification of Non-
Disturbance of Site ANC-078**

Judith Bittner
State Historic Preservation Officer
Alaska Department of Natural Resources – SHPO
550 West 7th Avenue, Suite 1310
Anchorage, Alaska 99501-3565

Dear Ms. Bittner:

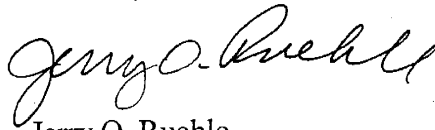
On March 17, 2003 we transmitted to SHPO a report entitled *Archaeological and Historic Site Survey Along the Seward Highway, Mile 105 to Mile 115*, prepared by Dr. Douglas Reger for the Alaska Department of Transportation and Public Facilities (ADOT&PF). Based on a March 14, 2003 meeting that included Stefanie Ludwig (SHPO), Susan Wick (ADOT&PF), Judy Dougherty (ADOT&PF), Joyce Payne (URS Corporation), Dr. Douglas Reger (Reger Archaeological Consulting), and Michael Yarborough (Cultural Resource Consultants), the March 17, 2003 letter identified the disturbance of one cultural site (ANC-078). At the time of the March 14, 2003 meeting, the proposed highway improvements would have disturbed cultural site ANC-078 due to highway and railroad realignment in that area. SHPO correspondence to ADOT&PF on April 10, 2003, concurred that site ANC-078 was eligible for inclusion in the National Register under criterion D, would be adversely affected by the proposed Seward Highway Safety Improvements project, and would require the development of a Memorandum of Agreement addressing mitigation of the adverse effects.

Plan set revisions to reflect changes to the preferred alignment of the highway and railroad were in preparation at the time of the March 14, 2003 meeting and the ADOT&PF and SHPO correspondence. After the revised plan sets were distributed, all parties recognized that cultural site ANC-078 would no longer be disturbed or adversely affected by the realignment of the Seward Highway or the Alaska Railroad.

Although preliminary activities were initiated by Mike Yarborough to develop a Memorandum of Agreement, this action is no longer necessary. Mr. Yarborough has discussed this chain of events and the current Seward Highway Safety Improvements preferred routing in the vicinity of ANC-078 with Stephanie Ludwig. We have confirmed that all parties involved in the March 14, 2003 meeting have current plan sets and this Department has determined that neither ANC-078, nor any other cultural site in the project area will be adversely affected.

The purpose of this letter is to ask your concurrence with this Department's revised findings of eligibility and effect. If you have any further questions regarding this project, please contact Mike Yarborough at 349-3445, or Susan Wick, ADOT&PF Environmental Team Leader, at 269-0530.

Sincerely,

A handwritten signature in cursive script, reading "Jerry O. Ruehle".

Jerry O. Ruehle
Environmental Coordinator

cc: Robert Campbell, P.E., ADOT&PF Contract Manager
Judy Dougherty, P.E., ADOT&PF Design Project Manager
Mike Yarborough, Archaeologist, Cultural Resources Consultants
Jim Glaspell, URS Corporation, Project Manager

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

FRANK H. MURKOWSKI, GOVERNOR

550 W. 7th Ave., SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8908

October 16, 2003

File No.: 3130-2R DOT

SUBJECT: Seward Highway Safety Improvements, MP 105-115
Project No. 55631
Revised assessment of effect for ANC-78

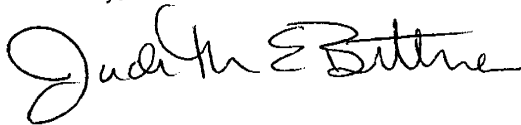
Jerry Ruehle
Environmental Coordinator
Department of Transportation and Public Facilities
Statewide Design and Engineering Services
4111 Aviation Avenue
P. O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Ruehle:

We have reviewed your correspondence (received 9/29/2003) and map (received 10/15/2003) regarding modifications to the referenced project in accordance with Section 106 of the National Historic Preservation Act. Provided that the 10/15/2003 map reflects the final design, and that access to ANC-78 is avoided during construction, we concur that ANC-78 will not be adversely affected by the Seward Highway Safety Improvements project.

Please contact Stefanie Ludwig at 269-8720 if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:sl

OCT 21 03
56631

Environmental	3	
Project Manager	Judy D.	
Project Coordinator	1	
Team Leader	/	
Staff		
URS	/	
Permits Hydrologist		
Project File	12	
Central	/	

Boydston, Mark A (DOT)

From: Duvall, Shina A (DNR)
Sent: Tuesday, March 19, 2013 1:31 PM
To: Gomez, Valerie L (DOT)
Cc: Boydston, Mark A (DOT)
Subject: RE: Windy Corner Geotechnical Survey (Seward Highway MP 105-107) - Section 106 Consultation

Dear Valerie,

Thank you for providing this information. Following our review of the documentation provided, we concur that a finding of **no historic properties affected** is appropriate for the proposed geotechnical survey work. This concurrence is based on the assumption that the sites would be accessed by helicopter and very little ground disturbance will be necessary. If additional access is needed at any of the proposed sites which would require cutting new road/trail, we would appreciate an opportunity to consult further.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) in consultation with our office.

Thank you for the opportunity to comment. Please let me know if we may be of further assistance.

Best regards,
Shina

Shina duVall, RPA
Archaeologist, Review and Compliance Coordinator
Alaska State Historic Preservation Office / Office of History and Archaeology
550 W. 7th Ave., Suite 1310
907-269-8720 (phone) 907-269-8908 (fax)
shina.duvall@alaska.gov

From: Gomez, Valerie L (DOT)
Sent: Thursday, February 28, 2013 9:37 AM
To: Duvall, Shina A (DNR)
Cc: Boydston, Mark A (DOT)
Subject: Windy Corner Geotechnical Survey (Seward Highway MP 105-107) - Section 106 Consultation

Shina,
DOT&PF, using FHWA funds, is planning to conduct geotechnical test bores to assess potential material sites along the Seward Highway (see proposed 2013 test hole plan attached). Several 8 inch borings would be made along property adjacent to the Seward Highway. The potential material sites are located on steep rocky cliffs. Due to this, there is no land-based access to most of the sites and DOT&PF intends to helicopter in the rigs and personnel to conduct the geotechnical testing.

DOT&PF cultural resource staff reviewed the proposed drill plan against the AHRS database and cultural resource reports conducted along this corridor. Based on these reviews, DOT&PF has concluded that no known sites would be impacted by the proposed test holes. Additionally, as the majority of sites would require helicopter access, the ground time of the rigs will be minimal and therefore, there is less potential for disturbing unknown sites. Based on the information provided above, DOT&PF finds that the geotechnical survey for the Windy Corner Project will have **no effect** on historic properties.

We are seeking your concurrence on the above finding. Please feel free to contact me if you have an questions regarding this undertaking.

Thank you,
Valerie

Valerie Gomez
Cultural Resources Specialist
Preliminary Design and Environmental
DOT&PF, Central Region
907-269-0535 / valerie.gomez@alaska.gov

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