



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

Environmental Assessment

*Appendix Q: Section 106
Consultation/Findings*

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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RE: 2023-00713: Safer Seward Highway (Z566310000/0A31034) - Updated Findings Response

From Applegate, Elyse Gc (DNR) <elyse.applegate@alaska.gov>

Date Thu 10/23/2025 12:21 PM

To Hilsinger, Erik D (DOT) <erik.hilsinger@alaska.gov>

Hi Erik,

Thank you for your inquiry. Our office believes that a finding of **no historic properties adversely effected** is appropriate for the undertaking as DOT&PF has incorporated avoidance and minimization measures into the proposed alternatives. One such measure modified visitor access to the Potter Section House to improve safety instead of moving the Potter Section House to a different location. Please let me know if you have any other questions or concerns; I'm happy to schedule a meeting to discuss further.

-Elyse

Elyse Applegate, M.A., M.S.

Archaeologist; DOT&PF Liaison

SOA | DNR | AK SHPO | OHA

elyse.applegate@alaska.gov

Dena'inaq ehnen'aq' gheshtnu ch'q'u yeshdu 'I live and work on the land of the Dena'ina.'

From: Hilsinger, Erik D (DOT) <erik.hilsinger@alaska.gov>

Sent: Tuesday, October 21, 2025 2:30 PM

To: Applegate, Elyse Gc (DNR) <elyse.applegate@alaska.gov>

Subject: Re: 2023-00713: Safer Seward Highway (Z566310000/0A31034) - Updated Findings Response

Does the letter represent a concurrence with the finding of no adverse effect to historic properties for the proposed Safer Seward Highway project?

Best,

E.

From: Applegate, Elyse Gc (DNR) <elyse.applegate@alaska.gov>

Sent: Tuesday, October 21, 2025 11:11 AM

To: Hilsinger, Erik D (DOT) <erik.hilsinger@alaska.gov>

Subject: 2023-00713: Safer Seward Highway (Z566310000/0A31034) - Updated Findings Response

3130-1R FHWA / 2023-00713 / Safer Seward Highway (Z566310000/0A31034) – Updated Findings 10/2025

Hi Erik,

Please find attached our response to the updated findings for the subject project. Let me know if you have any questions or concerns.

-Elyse

Elyse Applegate, M.A., M.S.

Archaeologist; DOT&PF Liaison

Alaska State Historic Preservation Office

Office of History and Archaeology

550 West 7th Avenue, Suite 1310

Anchorage, AK 99501-3561

elyse.applegate@alaska.gov

Dena'inaq enen'aq' gheshtnu ch'q'u yeshdu 'I live and work on the land of the Dena'ina.'





THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION
Office of History & Archaeology

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October 16, 2025

File No.: 3130-1R FHWA / 2023-00713

Erik Hilsinger
Cultural Resource Specialist, Central Region
Alaska Department of Transportation and Public Facilities
erik.hilsinger@alaska.gov

Subject: Safer Seward Highway (Z566310000/0A31034)

Dear Mr. Hilsinger,

On October 3, 2025, the Alaska State Historic Preservation Office (SHPO) received your Section 106 updated findings documentation (dated October 3, 2025) including HDR's September 26, 2025 *Cultural Resources Field Survey Findings and Supplemental Archival Research for the Safer Seward Highway Project* (memorandum), sent in response to our August 29, 2025 request for additional information regarding the Sheep Creek Cabins (ANC-00110), the Whittier-Anchorage Pipeline System (SEW-01044), the Anchorage-Whittier Pipeline (SEW-01275), and the Potter Marsh Weigh Station. Following our review, we offer the following comments:

Thank you for taking our prior comments into consideration, including looking for the Sheep Creek Cabins site (ANC-00110). We agree that ANC-00110 has significance under Criterion A for its association with broad patterns of Alaska history during the period of significance (1910-1970); however, the site was not located in the areas surveyed and documented in the memorandum. As such, we propose that the site is not located within the area of potential effects and will adjust the site's mapped location accordingly.

Our understanding is this project is unlikely to adversely affect SEW-01044/SEW-01275; we appreciate the representative photographs of the remaining hat markers, which may demarcate the original pipeline alignment.

Thank you for taking the time to conduct additional research regarding the Potter Marsh Weigh Station. We agree that the Potter Marsh Weigh Station is modern in age and does not need to be considered for the National Register of Historic Places (NRHP).

Please contact Elyse Applegate at elyse.applegate@alaska.gov if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Sarah Meitl".

Sarah Meitl
Deputy State Historic Preservation Officer
SM:egca



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities

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Re: Safer Seward Highway
Z566310000/0A31034
File No.: 3130-1R FHWA / 2023-00713

Response to SHPO comments dated August 29, 2025

ATTENTION: This finding contains one Determination of Eligibility

October 3, 2025

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

Dear Ms. Meitl:

The Alaska Department of Transportation and Public Facilities (DOT&PF) received your letter dated August 29, 2025. We thank you for your thorough review and ongoing participation in consultation for the Safer Seward Highway Project (Project).

Herein we offer responses to the specific comments provided in your office's August 29, 2025, letter. Additionally, we are seeking your concurrence with one determination of eligibility for the Sheep Creek Cabins site (ANC-00110), and DOT&PF's overall finding of effect for the undertaking.

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

Consultation for this Project is being conducted in accordance with the 2017 *First Amended Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*. The DOT&PF, acting as a federal agency, finds **no adverse effect on historic properties** by the proposed Project pursuant to 36 Code of Federal Regulation (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).

"Keep Alaska Moving through service and infrastructure."

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 13, 2023 and executed by FHWA and DOT&PF.

Determination of Eligibility for ANC-00110 (Sheep Creek Cabins)

In response to your office's comments the DOT&PF contracted HDR Engineering, Inc. (HDR), to survey this site location in August 2025, determine if anything remains of the site, and provide an updated re-evaluation of the site's potential for National Register of Historic Places (NRHP) eligibility. A memorandum providing the 2025 field survey findings and updated Alaska Heritage Resources Survey (AHRs) card are attached for your review. The 2025 survey included pedestrian survey, subsurface testing, and metal detection. No definitively associated cultural resources were identified at the previously plotted location of ANC-00110. HDR's field crew identified the location where the site was previously described, but erosion and other disturbances appear to have removed nearly all evidence of the site.

Criterion A

Prior documentation of the Sheep Creek Cabins site (ANC-00110) suggests the remains may be related to the ANC-00101 telegraph station site. Additionally, there is a likelihood that the site was associated with the Iditarod National Historic Trail and construction of the Alaska Railroad, because the Sheep Creek vicinity along Turnagain Arm is referenced as a work camp in a historical photograph and journal entries from 1916. Therefore, the Sheep Creek Cabins site has potential significance under Criterion A as it is associated with broad patterns of Alaska history. The period of significance is 1910 to 1970.

Criterion B

The DOT&PF recommends that ANC-0110 is not significant under Criterion B. The site is not associated with individuals who made significant contributions to our local, state, or national historic context.

Criterion C

The DOT&PF recommends that ANC-0110 is not significant under Criterion C. The site does not represent the work of a master and does not possess high artistic value.

Criterion D

The DOT&PF recommends that ANC-0110 is not significant under Criterion D. The site is destroyed and unable to yield additional information that would contribute to our understanding of human history. No prehistoric or historic subsurface archaeological resources have been identified in association with the site within the Area of Potential Effects.

Integrity

As illustrated by recent field investigations, physical remains of the site observed by HDR archaeologists are limited to two saw-cut logs, which do not have any definitive association with the original site. The site has lost all integrity of location, design, association, materials, workmanship, setting, and feeling. Therefore, given this re-evaluation, the DOT&PF has determined that ANC-00110 is **not eligible** for the NRHP under any criteria. We respectfully request your review and concurrence with this determination.

Stuckagain Heights Survey Area: LWCF Section 6(f) Survey Parcel

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act requires replacement of recreational lands acquired with federal funding. Since the Project would acquire areas of Chugach State Park currently used for recreation along Turnagain Arm, the DOT&PF intends to replace these areas through an exchange. Since our last correspondence, the DOT&PF identified a parcel of land adjacent to Anchorage's Stuckagain Heights neighborhood to replace the areas of Chugach State Park that would be impacted by the Project. At the direction of the DOT&PF HDR archaeologists completed a cultural resources survey to assess the potential presence of historic properties within this 6(f) parcel. The methods and results of this survey are included in the attached memorandum. No cultural resources were identified within the 6(f) survey area.

SEW-01044 (Whittier-Anchorage Pipeline System)/SEW-01275 (Anchorage-Whittier Pipeline)

Thank you for your recommendations regarding the now-decommissioned Whittier-Anchorage/ Anchorage-Whittier Pipeline System segments. While DOT&PF maintains that the proposed Project would have no adverse effect upon the segments, we will take your recommendation that they be re-evaluated in the future under advisement. As a courtesy for your records, we have attached some current representative photographs of the only known above-ground evidence associated with the system—a series of hat markers that demarcate the original pipeline alignment.

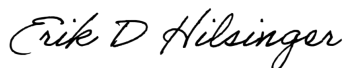
Potter Weigh Station

In response to your office's comments, the DOT&PF contracted HDR to conduct archival research and interviews to better understand the history of the Potter Weigh Station, currently located between Seward Highway Mileposts 114 and 115, because the Project proposes to construct a new weigh station. The attached memorandum also includes current photographs and a summary of the results of this research, which found that the current weigh station was built in 1983 or later and is, therefore, no older than 42 years of age. As such, it is not a potential historic property that requires evaluation for NRHP eligibility.

Finding of Effect

DOT&PF has determined that ANC-0110 is **not eligible** for the NRHP under any criteria. DOT&PF finds that the undertaking would have **no adverse effect on historic properties** pursuant to 36 CFR 800.5(b). We are respectfully seeking your review of the enclosed documentation, and concurrence with all determinations and findings. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0534, or by email at erik.hilsinger@alaska.gov.

Sincerely,



Erik Hilsinger
Cultural Resources Specialist
Professionally Qualified Individual

Enclosures:

Memorandum: 2025 Cultural Resources Field Survey Findings and Supplemental Archival Research
for the Safer Seward Highway Project

Alaska Heritage Resources Survey Site Form: ANC-00110

Representative Photographs: SEW-01044 (Whittier-Anchorage Pipeline System) / SEW-01275
(Anchorage-Whittier Pipeline)

Electronic cc w/ enclosures:

Sean Baski, DOT&PF Central Region, Chief of Highway Design, Project Coach

Brian Elliott DOT&PF Central Region, Regional Environmental Manager

Matt Dietrick, DOT&PF Statewide NEPA Manager

Holly McKinney, DOT&PF Statewide Cultural Resources Manager



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Department of Natural Resources

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August 29, 2025

File No.: 3130-1R FHWA / 2023-00713

Erik Hilsinger
Cultural Resource Specialist, Central Region
Alaska Department of Transportation and Public Facilities
erik.hilsinger@alaska.gov

Subject: Safer Seward Highway (Z566310000/0A31034)

Dear Mr. Hilsinger,

On July 31, 2025, the Alaska State Historic Preservation Office (SHPO) received your interim Section 106 findings documentation (dated July 24, 2025) including HDR's February 2025 *Additional Research Report: Iditarod Connection Trails (SEW-00257, SEW-00143, SEW-00566/ANC-00279)*, sent in response to our May 16, 2025, comments and April 22, 2025, request for additional information. Following our review, we offer the following comments:

We concur with the two determinations of eligibility (DOEs) for SEW-00257 (Girdwood-Ship Creek Connecting Trail) and ANC-00279/SEW-00566 (Potter Connecting Trail), both segments of the Iditarod National Historic Trail system falling within the project Area of Potential Effects (APE), as not eligible for the National Register of Historic Places (NRHP) due to lack of integrity.

We find the survey planned for ANC-00110 (Ship Creek Cabins) acceptable; we look forward to reviewing the survey results. We have no objections to the changes to the alignment for SEW-0029 and ANC-04057/SEW-01613 (Alaska Railroad from Rainbow to Potter within the Turnagain District of the Alaska Railroad). We also agree that because SEW-1075 (Power Transmission Line) was rebuilt in 2015, it is not currently eligible for the NRHP.

Our understanding is this project is unlikely to adversely affect SEW-01044/SEW-01275 (Whittier-Anchorage Pipeline System/ Anchorage-Whittier Pipeline). However, because the DOE for these sites is over 20 years old, we believe the sites should be re-evaluated in the future with a survey utilizing metal detection.

Lastly, per the August 28, 2025, Safer Seward Highway Design Review meeting, it has come to our attention there are plans to construct a new weigh station at Seward Highway mileposts 114-115. The Potter Weigh Station has not been formally evaluated for the NRHP, therefore we request this property be evaluated as part of the Section 106 effort for this project.

Please contact Elyse Applegate at elyse.applegate@alaska.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Meitl".

Sarah Meitl
Deputy State Historic Preservation Officer
SM:egca



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities

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July 24, 2025

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

Re: Safer Seward Highway
Z566310000/0A31034
Response to SHPO non-concurrence and comments dated May 16, 2025

Dear Ms. Meitl:

The Alaska Department of Transportation and Public Facilities (DOT&PF) received your letter dated May 16, 2025. We have reviewed the specific comments provided therein and offer additional information as well as proposed next steps and resolutions below.

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

Consultation for this Project is being conducted in accordance with the 2017 *First Amended Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*.

Please refer to our letter dated March 26, 2025, for project specifications and details such as Project Location, Description, Purpose and Need, Area of Potential Effects, and Identification Efforts, Sites Documented to date, and Consultation Efforts. Herein we provide responses to specific comments and concerns raised by your office in a letter dated May 16, 2025, and request your review and concurrence with two determinations of eligibility. Once outstanding items are resolved, DOT&PF will send in a proposed finding of effect for the overall project.

ANC-00110 (Sheep Creek Cabins)

In response to your office's comments, DOT&PF intends to survey this location during the 2025 field season to determine if anything remains of the site. We will provide a summary of any findings as well as an updated AHRS card for the site following the survey.

"Keep Alaska Moving through service and infrastructure."

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 13, 2023 and executed by FHWA and DOT&PF.

SEW-01044 (Whittier-Anchorage Pipeline System) / SEW-01275 (Anchorage-Whittier Pipeline)

We reviewed the past determinations of eligibility (DOE) and associated documentation for these pipelines. Both were determined to be ineligible for the National Register of Historic Places (NRHP) due to 1) not meeting any of the NRHP-significance criteria and 2) lack of integrity because the Anchorage Terminal is no longer extant. The DOEs did not dismiss the potential eligibility of these pipelines based on their age at the time of documentation. They each considered a period of significance from 1967-1996.

The remnants of these pipeline segments are not present or visible, nor are there any surface markers of the pipelines in the APE. DOT&PF maintains that the subsurface segments within the APE do not contribute to the history of the corridor. Even if the previous DOEs were to change, the buried segments within this APE cannot convey any potential historic significance as there are no visible components. It is DOT&PF's position that the previous DOEs sufficiently demonstrate that these pipeline segments do not meet NRHP eligibility criteria and that they lack.

SEW-1075 (Power Transmission Line)

Further research has shown that Chugach Electric contractors rebuilt this powerline in 2015 and more recently in 2024-2025 for the Girdwood to Indian Transmission Line Reconstruction Project (2025). The reconstructed powerline is less than 45 years of age and therefore not eligible for the NRHP.

SEW-00143, SEW-00257, and SEW-00566/ANC-00279 (Iditarod National Historic Trail)

HDR provided a report entitled *Additional Research Report: Iditarod Connecting Trails*, which addresses previous requests for additional INHT research using supplemental historical documentation to augment what was provided in the field survey report. This report takes an archival look at the trail and trail system through this area. Please refer to this report for additional information about the INHT research that was completed. The report was included as an attachment to the March 26, 2025 Finding of Effect letter. It is attached again here for ease of reference.

DOT&PF, DNR, and the Alaska Railroad signed a sunsetless Programmatic Agreement (PA) to allow continued access to the right of way for the traveling public, including Iditarod Trail users. The BLM mapper for "Ground Transportation Linear Features" shows the historic trail leaving the railroad right of way at Girdwood then over Crow Pass to Eagle River outside the Project APE. No evidence of contributing trail segments were identified in the APE.

SEW-00029 and ANC-04057/SEW-01613 (Alaska Railroad from Rainbow to Potter within the Turnagain District of the Alaska Railroad)

This corridor retains its character-defining features and will not be adversely affected by minor changes to the alignment. This is in keeping with the history of the road and railroad along this segment, which has gained and lost features (e.g., snowsheds, telegraph wires, section houses, bridge upgrades), as well as changed alignments and track layouts since original construction was undertaken. It will retain its prism, track, and spatial relationship with the Seward Highway in this narrow corridor, which is the shared defining feature of the shared right of way. DOT&PF maintains that the Project-related activities will not adversely affect this segment of the Alaska Railroad.

Sites Recommended Not Eligible for Listing in the NRHP

DOT&PF requests your review and concurrence on the following two determinations of eligibility.

SEW-00257 (Girdwood-Ship Creek Connecting Trail)

This trail is part of the INHT system. It runs along Turnagain Arm from Girdwood to Indian Creek and follows the Indian Valley Trail (SEW-00143/ANC-00281) to Ship Creek (Attachment A, Pages 13–16). Completion of the trail from Girdwood to Indian Creek in 1908 provided an alternate route to the Crow Pass Trail (Hosken et al. 2024:23). Within the Project’s APE, the trail follows the same trajectory as SEW-00143, Indian Valley Trail, and RST 111, Indian Pass Trail (Hosken et al. 2024:27; Keen 2025).

HDR observed no evidence of SEW-00257, SEW-00143, or RST 111 in the project APE during the 2023 survey. Archaeologists inspected Boretide Road, where both SEW-00143 and SEW-00257 turn northward into Indian Valley, and the area where SEW-00566 intersects Indian Valley Road (Hosken et al. 2024:58). It appears likely that the trail segments in the APE were removed when the railroad section house was removed following highway construction.

Criterion A

Prior research of the trail indicates it was established to assist the transportation of people and goods during key moments in Alaska’s development: the gold rush era (turn of the century), Alaska Railroad construction (circa 1905–1923), and Seward Highway construction (1950s). The trail connected Seward and nascent communities along Turnagain Arm with local mines and provided access for laborers and machinery to forge more permanent transportation routes through the region via rail and highway. The connecting trails within the APE served an important role in the population and economic growth of the region. The Girdwood-Ship Creek Connecting Trail (SEW-00257) has significance within the context of this study, in keeping with the previously determined NRHP-eligible Indian Valley Trail (SEW-00143). As a contributing feature of the INHT, the period of significance is 1906 to 1940.

Criterion B

DOT&PF recommends that SEW-00257 is not significant under Criterion B. The trail is not associated with individuals who made significant contributions to our local, state, or national historic context.

Criterion C

DOT&PF recommends that SEW-00257 is not significant under Criterion C. The trail does not represent the work of a master and does not possess high artistic value.

Criterion D

DOT&PF recommends that SEW-00257 is not significant under Criterion D. The trail is not likely to yield additional information that would contribute to our understanding of human history. No prehistoric or historic subsurface archaeological resources have been identified in association with the trail within the APE.

Integrity

As illustrated by recent field investigations, SEW-00257 has, at best, intermittent, and more broadly, negligible physical evidence within the APE. Paths are visible that have been cut into the steep slope, and more recently cleared trails are far from and at a higher elevation than the Project’s transportation

corridor. The trails attributed to this route are not continuous and disappear in the vicinity of the railroad and highway ROW.

Limited physical evidence of the trails within the APE diminishes their integrity of location, design, setting, feeling, and association. NPS (1995:44) states: “The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property’s physical features and how they relate to its significance.”

One of the four steps in assessing a resource’s integrity is determining whether its essential physical features are visible enough to convey its significance (NPS 1995:45). Additionally, NPS states:

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction (NPS 1995:46).

Based on results of the recent cultural resources investigations, physical features of the trails are no longer extant or visible within the APE at the elevation of the Seward Highway corridor. Trail segments high above the roadway, some of which have been reconstituted and cleared for recreational use (e.g., the Turnagain Arm Trail in Chugach State Park), are recognizable as components of the early connecting trails; however, these segments are not subject to impacts from the Project. Overall, the loss of numerous resources associated with the original trails, especially via railroad and Seward Highway construction, has impacted the integrity of the three connecting trails within the APE (Keen 2025). DOT&PF finds that SEW-00257 does not retain sufficient integrity within the Project’s APE to be considered contributing to any NRHP historic property (Keen 2025).

ANC-00279/SEW-00566 (Potter Connecting Trail)

This trail is part of the INHT system and runs from Indian Creek where the Indian Valley Trailhead (SEW-00143) is located to Potter Creek (Attachment A, Page 9–13). This portion of the trail in the Seward quadrangle runs from Indian Creek westward along the northern shore of Turnagain Arm to just south of Rainbow (ANC-00113). It is also known as Johnson Trail (Yarborough et al. 2009:21).

In 2001, archaeologists surveyed the ROW corridor for the Seward Highway Bird Point to Potter Marsh Passing Lanes and Pathway Project (MPs 99 to 115). Archaeologists identified ANC-00279/SEW-00566 at various points along the Project area, generally uphill and away from the Project limits (Reger 2001:14), although actual locations or photographs of the trail are not provided in the report.

In 2007, CRC archaeologists documented a 10-foot-wide trail cut into a steep slope of a hillside north of the highway and west of the Indian Valley Mine and speculated that the trail is part of SEW-00566. Archaeologists followed the trail for approximately 0.1 mile, trending west-northwest (Yarborough et al. 2009:22). Photographs or maps showing the location of the trail are not included in the report.

DOWL archaeologists carried out a pedestrian survey during March 2015 on behalf of the Windy Corner Project. SEW-00566 was potentially within the 2015 survey area, but archaeologists could not positively identify the trail (Zuccotti and Kennedy 2015).

HDR attempted to identify the location of the INHT (SEW-00143, SEW-00257, and SEW-00566) as it passes through Indian. HDR observed no evidence of historic-age trails (Hosken et al. 2024:58).

Criterion A

Based on prior research (see Keen 2025), both the Girdwood-Ship Creek Connecting Trail (SEW-00257) and the Potter Connecting Trail (ANC-00279/SEW-00566) share a similar history with the Indian Valley Trail (SEW-00143). In each case, the trail was established to assist the transportation of people and goods during key moments in Alaska's development: the gold rush era (turn of the century), Alaska Railroad construction (circa 1905–1923), and Seward Highway construction (1950s). Connecting Seward and nascent communities along Turnagain Arm with local mines and providing access for laborers and machinery to forge more permanent transportation routes through the region via rail and highway, the connecting trails within the APE served an important role in the population and economic growth of the region. Thus, the Potter Connecting Trail (ANC-00279/SEW-00566) has significance within the context of this study, in keeping with the previously determined NRHP-eligible Indian Valley Trail (SEW-00143). As a contributing feature of the INHT, the period of significance is 1906 to 1940.

Criterion B

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion B. The trail is not associated with individuals who made significant contributions to our local, state, or national historic context.

Criterion C

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion C. The trail does not represent the work of a master and does not possess high artistic value.

Criterion D

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion D. The trail is not likely to yield additional information that would contribute to our understanding of human history. No prehistoric or historic subsurface archaeological resources have been identified in association with the trail within the APE.

Integrity

As illustrated by recent field investigations, the Potter Connecting Trail has, at best, intermittent, and more broadly, negligible physical evidence within the APE. As noted, paths cut into the steep slope, and more recently cleared trails are removed from and at a higher elevation than the Project's transportation corridor that are still extant and visible components of the connecting trails. However, they are not continuous and disappear in the railroad and highway ROW vicinity.

Limited physical evidence of the trails within the APE diminishes their integrity of location, design, setting, feeling, and association. NPS (1995:44) states: "The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance."

One of the four steps in assessing a resource's integrity is determining whether its essential physical features are visible enough to convey its significance (NPS 1995:45). Additionally, NPS states:

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction (NPS 1995:46).

Based on results of the 2023 cultural resources investigations, most physical features of the trail are no longer extant or visible within the Project's APE, except some trail segments above the elevation of the Project ROW. The loss of numerous resources associated with railroad construction as well as the construction of the railroad itself and the Seward Highway has impacted the integrity of the three connecting trails within the APE. While the historic significance of the Iditarod Trail system has been determined, the lack of physical remains of the connecting trail segments within the APE render these segments incapable of conveying that significance (Keen 2025). DOT&PF finds that ANC-00279/SEW-00566 does not retain sufficient integrity within the Project's APE to be considered contributing to any NRHP historic property (Keen 2025).

We respectfully request your review and concurrence with these two determinations of eligibility and welcome any other comments you may have on the information provided herein. Additional information regarding the Sheep Creek Cabins site (ANC-00110) is forthcoming.

We look forward to continued consultation on the subject undertaking. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0534 or by email at erik.hilsinger@alaska.gov.

Sincerely,

Erik Hilsinger
Cultural Resources Specialist
Professionally Qualified Individual

Enclosures

Attachment A – *Additional Research Report: Iditarod Connecting Trails (SEW-00257, SEW-00143, SEW-00566/ANC-00279)*

Electronic cc w/ enclosures:

Sean Baski, DOT&PF Central Region, Chief of Highway Design, Project Coach

Brian Elliott DOT&PF Central Region, Regional Environmental Manager

Matt Dietrick, DOT&PF Statewide NEPA Manager

Holly McKinney, DOT&PF Statewide Cultural Resources Manager

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THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

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May 16, 2025

File No. 3130-1R FHWA / 2023-00713

Erik Hilsinger
Cultural Resource Specialist, PQI
Central Region
Alaska Department of Transportation and Public Facilities
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Subject: Safer Seward Highway (Z566310000/0A31034) Findings and RFI

Dear Erik,

On April 23, 2025, the Alaska State Historic Preservation Office (SHPO) requested additional information in response to the subject project's initial findings letter (dated March 26, 2025), which our office received, along with HDR's April 2024 *Safer Seward Highway Project, Seward Highway MP 98.5 to 118: Bird Flats to Rabbit Creek* (report), on March 27, 2025. On April 25, 2025, SHPO received the Department of Transportation and Public Facilities (DOT&PF) response to our request for additional information, including the *Proposed Action Footprint*. Upon review of the materials provided, we offer the following comments.

We do not concur with the project finding of **No Historic Properties Adversely Affected**. Several sites within the *Proposed Action Footprint* lack information needed to fully evaluate project effects.

ANC-00110 (Sheep Creek Cabins),

ANC-00110 falls within the project area of potential effects (APE) and is on the border of the *Proposed Action Footprint*. Because HDR was unable to access this site during their 2023 survey, we request the site be revisited to complete evaluation.

SEW-01044 (Whittier-Anchorage Pipeline System)/ SEW-01275 (Anchorage-Whittier Pipeline)

In 2003, SEW-01044's was not eligible for the NRHP due to the absence of pipeline terminals. It is our belief that the pipeline could be buried within the APE and if extant, should be reconsidered for NRHP eligibility because 1) the original DOE is over 20 years old, and 2) the pipeline would now be of age to be considered historic. We believe research for these historic properties is incomplete and request a review of historic documentation such as pipeline as-builts and plans to determine potential pipeline corridor location(s) to conduct on-site metal detection.

SEW-01075 (Power Transmission Line)

It is our understanding that the historic 90.4-mile-long power transmission line built in 1962 was evaluated in 2005 and 2012 and on both accounts found not eligible for the NRHP. Both evaluations are over 10 years old; we request a revised DOE that explores aspects of significance given the power transmission line remains in use to carry power produced at Cooper Lake, Bradley Lake, and Nikiski.

SEW-00143, SEW-00257, and SEW-00566/ANC-00279 (Iditarod National Historic Trail)

The Iditarod National Historic Trail is a congressionally designated corridor. Although HDR was unable to positively identify physical evidence of remnants of the Iditarod Trail (which is not the same as the Iditarod National Historic Trail corridor), the corridor remains historically significant. HDR made recommendations for further investigation of historic documents but did not conduct these tasks; we recommend these tasks be completed.

Additionally, site numbers SEW-00029 and ANC-04057/SEW-01613 refer to the segment of the Alaska Railroad between Rainbow to Potter and is part of the Turnagain District of the Alaska Railroad. This section of railroad was relocated to an adjacent parallel alignment between 1949 and 1951 and determined eligible for listing in the NRHP in 2014 under Criterion A. While prior improvements to the Seward Highway have not adversely affected this segment, shifting ~7 miles of the railroad alignment to accommodate widening the highway and straightening highway curves, and extending, replacing, or upgrading railroad bridge 88.1 (Indian Creek) may constitute an adverse effect.

Per 36 CFR § 800.6, *Resolution of Adverse Effects*, we request continued consultation to evaluate alternatives or modifications to this undertaking that could avoid, minimize or mitigate adverse effects on historic properties, and begin developing a project Memorandum of Agreement (MOA).

Lastly, please ensure the AHRS cards for the sites evaluated in HDR's survey are updated, and applicable cards continue to be updated as new data is gathered during subsequent cultural resources fieldwork resulting from this project.

Please contact Elyse Applegate at elyse.applegate@alaska.gov if you have any questions.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer
JEB:egca



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

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March 26, 2025

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

Re: Safer Seward Highway Project Z566310000/OA31034
Finding of No Adverse Effect

ATTENTION: This finding contains two (2) Determinations of Eligibility.

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has assumed the responsibilities of the Federal Highway Administration (FHWA) under 23 United States Code (U.S.C.) 327 and is proposing to construct improvements along the Seward Highway between mileposts (MPs) 98.5 and 118, Bird Flats and Rabbit Creek. The purpose of the Safer Seward Highway Project (Project) is to improve safety by reducing crash rates and severity, improve mobility and reliability, and safely accommodate mixed uses within the corridor.

The existing Seward Highway within the Project corridor is an undivided Interstate Highway, with a posted 55-mile-per-hour speed limit, that consists of two 12-foot-wide travel lanes, 8-foot-wide shoulders with rumble strips, and limited passing or acceleration/deceleration lanes. The highway is constrained between the steep slopes of the Chugach Mountains and the waters of Turnagain Arm. The Seward Highway is a National/State Scenic Byway and All-American Road. It provides the only road access from Anchorage to communities to the south (e.g., Girdwood, Seward, Kenai) and the Alaska Marine Highway System, which stops at the ports of Whittier, Seward, and Homer. The Seward Highway supports commercial, recreational, and residential traffic.

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this Project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding (MOU) dated April 13, 2023, and executed by FHWA and DOT&PF. Consultation for this Project is being conducted in accordance with the 2017 *First Amended Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*. DOT&PF, acting as a federal agency, **finds no adverse effect to historic properties** from the proposed Project pursuant to 36 Code of Federal Regulation (CFR) 800.5(b), implementing regulations of Section 106 of the National Historic Preservation Act (NHPA). This submission provides documentation in support of this finding, as required at 36 CFR 800.11(e).

"Keep Alaska Moving through service and infrastructure."

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 13, 2023, and executed by FHWA and DOT&PF.

Project Location

The Project is located within United States Geological Survey (USGS) map quadrangles Anchorage A-8 and Seward D-7 and D-8, Seward Meridian, within Sections 5–6, 8–10, 14–15, and 23, Township 10 North (N), Range 1 West (W); Sections 1–4, Township 10N, Range 2W; Sections 30–34, Township 11N, Range 2W; Sections 4, 9–10, 15, 22–23, and 25–26, Township 11N, Range 3W; and Sections 32–33, Township 12N, Range 3W. The beginning of the Project is located at Latitude 60.9511, Longitude -149.4027 (MP 98.5 at Bird Flats); and the end of the Project is located at Latitude 61.0871, Longitude -149.8344 (MP 118, north of Potter Marsh, at the intersection/overpass to Rabbit Creek Road).

The State of Alaska, with DOT&PF and the Alaska Department of Natural Resources (ADNR) providing management, and the Alaska Railroad Corporation (ARRC) own most of the land within the Project corridor. The existing transportation corridor generally consists of a 300-foot-wide Public Land Order (PLO) highway right-of-way (ROW) and a 200-foot-wide ARRC ROW that are each centered on their respective alignments and partially overlap for most of the corridor. The road ROW consists of PLO easements and any additional ROW the state purchased under past projects to allow for highway construction, operation, and maintenance (Bennett 2013).

Project Description

DOT&PF is evaluating improvements to mobility and safety for motorized and non-motorized users of the Seward Highway between MPs 98.5 and 118. These improvements are anticipated to include both operational and safety improvements. Improvements may include managing access, incorporating turning and/or acceleration lanes, improving sight distances around curves, and/or adding travel lanes. Attachment A provides a series of maps showing the Project area.

This proposed Project is a safety project driven by the need to reduce high crash rates and severity, improve mobility and reliability, and safely accommodate mixed uses:

1. **Reduce High 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.
2. **Improve mobility and reliability.** Mobility 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 RV volumes; uncontrolled access to and from scenic turnouts and trailheads, driveways, and intersections; and difficult weather and road conditions.
3. **Safely accommodate mixed uses in the corridor.** The Project corridor's scenic, natural, and recreational attractions contribute to the highway's designation as a National Scenic Byway, All-American Road, and Alaska Scenic Byway. The need exists to maintain the corridor's scenic qualities while safely accommodating the needs of all users.

The current effort to improve safety along the Seward Highway between Girdwood and Anchorage began in the early 2000s when a Categorical Exclusion was approved for the Seward Highway Safety Improvements, Indian to Potter Marsh, MP 105–115 project. The smaller Seward Highway MP 105 to 107, Windy Corner project, began in 2013. After reviewing public comments on the draft Windy Corner Environmental Assessment (EA), DOT&PF extended the project limits 2.5 miles northward, to between Windy Corner and Rainbow Point. Following 2021 scoping for the Seward Highway MP 105–109.5, Windy Corner to Rainbow Point project, DOT&PF expanded the project corridor to its current extent and

renamed the project: Seward Highway Reconstruction MP 98.5 to 118, Bird Flats to Rabbit Creek. The current Project builds upon the prior work efforts and stakeholder feedback received on the draft Windy Corner EA and Seward Highway MP 105–109.5, Windy Corner to Rainbow Point project scoping.

Area of Potential Effects

The proposed Project extends along the Seward Highway between MPs 98.5 (Bird Flats) and 118 (north of Potter Marsh and the intersection/overpass to Rabbit Creek Road). The Project’s Area of Potential Effects (APE) is offset from the proposed Project components by 300 feet (see Attachment A Map Book). The APE encompasses the direct footprint (i.e., Project area, staging areas, and material sites) plus an adequate buffer to capture changes in Project design. The APE also encompasses potential visual and auditory effects. The APE is shown on the map book in Attachment A.

Identification

The proposed Project is located on Dena’ina land. The information for traditional placenames within the APE comes from *The Web Atlas of Alaska Dene Place Names* (Smith and Kari 2022). Dena’ina traditional territory approximately covers the area surrounding Cook Inlet (*Tikahtnu*). Several Dena’ina placenames are located within the APE (Table 1; Attachment A Map Book). These placenames are associated with the Tutl’uht’ana Band of the Dené of Upper Cook Inlet Dena’ina, Dené-Eyak-Łingit language family. Some English place names are indicative of indigenous use in the historic period as well, such as “Indian.”

Table 1. Dena’ina traditional placenames.

Name	Feature Type	Language	Literal Meaning	USGS Name
<i>Esbaytnu</i>	Stream	Dena’ina	goat stream	Bird Creek
<i>Nuti Edileni</i>	Stream	Dena’ina	that which flows into salt water	Indian Creek
<i>Q’isqa Betnu</i>	Stream	Dena’ina	banjo snowshoe stream mountain	McHugh Creek
<i>Hkaditali Betnu</i>	Stream	Dena’ina	drift lumber stream	Potter Creek
<i>Hkaditali</i>	Landform	Dena’ina	drift lumber	Potter Marsh
<i>Ggeh Betnu</i>	Stream	Dena’ina	rabbit stream	Rabbit Creek

Source: Smith and Kari 2022

There are 46 documented Alaska Heritage Resources Survey (AHRs) sites within the APE, 39 of which are historic in age. The sites with their AHRs numbers, site types, current determination of eligibility (DOE) status and reference pages in Attachment A are presented in

Table 2. The historic-era sites include cabins, trails, and roads associated with the Alaska Railroad, the Iditarod National Historic Trail (INHT) system, mining, the Cold War, and the Alaska Railroad itself. The six prehistoric sites are lithic scatters. Of the AHRs sites documented within the APE, 21 have been determined not eligible for listing in the National Register of Historic Places (NRHP), 3 are listed in the NRHP, 7 have been determined eligible for listing in the NRHP, 10 have not been evaluated, 3 have “other” status, and 2 are recommended not eligible for listing on the NRHP. See Attachment A Map Book for site locations.

Table 2. AHR Sites within the APE.

Site Number	Name	Site Type	Determination of Eligibility Status	Corresponding Attachment A Page
ANC-00050	Mrs. Johnson's Roadhouse	Historic	Not eligible	4
ANC-00054	Beluga Point	Prehistoric	Listed	8
ANC-00055	ANC-00055	Prehistoric	Not evaluated	8
ANC-00075	Potter Section House	Historic	Listed	4
ANC-00078	ANC-00078	Prehistoric	Eligible (Criterion D)	6
ANC-00105	Outhouse above Beluga Point	Historic	Not evaluated	8
ANC-00109	McHugh Creek Cabin	Historic	Not evaluated	7
ANC-00110	Sheep Creek Cabins	Historic	Not evaluated	6
ANC-00124	McHugh Wasteflake Site	Prehistoric	Not eligible	7
ANC-00279/ SEW-00566	Potter Connecting Trail	Historic	Recommended not eligible	9–13
ANC-00816	Isle Site	Prehistoric	Not evaluated	6–7
ANC-01962	Moen Homestead Trail	Historic	Not eligible	4
ANC-04057/ SEW-01613	Turnagain District of the Alaska Railroad (MP 64–93)	Historic	Eligible (Criterion A)	4–16
ANC-04069/ SEW-01557	Seward Highway	Historic/ Modern	Exempt (2005 ACHP Interstate Highway)	2–16
ANC-04349	McHugh Creek Road Weather Information System and Tower	Historic	Eligible (Criterion A)	6–7
SEW-00029	Alaska Railroad (Seward to MP 64)	Historic	Eligible (Criterion A)	9–16
SEW-00101	Indian Roadhouse Site	Historic	Not evaluated	13
SEW-00103	The Bird House	Historic	Not evaluated	15
SEW-00126	Indian Railroad Section	Historic	Not evaluated	13
SEW-00131	SEW-00131	Prehistoric	Not eligible	10
SEW-00132	Indian Sawmill Site	Historic	Not evaluated	13
SEW-00143	Indian Valley Trail	Historic	Eligible	13
SEW-00257	Girdwood-Ship Creek Connecting Trail	Historic	Recommended not eligible	13–16
SEW-00412	Indian Valley Mine	Historic	Listed	12
SEW-00996	Historic Tent Foundations and Can Scatters	Historic	Eligible (Criterion D)	14
SEW-01044	Whittier-Anchorage Pipeline System	Historic	Not eligible	14–16
SEW-01075	Power Transmission Line	Historic	Not eligible	13–16
SEW-01219	Prospect Pits	Historic	Not evaluated	14
SEW-01275	Anchorage-Whittier Pipeline	Historic	Not eligible	13–16
SEW-01321	Very Large Can Dump	Historic	Not eligible	15
SEW-01379	Diamond Jim's Sign	Historic	Eligible (Criterion A)	13
SEW-01500	Bird Creek Knoll	Prehistoric	Not evaluated	14
SEW-01559	Concrete Block Cluster	Historic	Not eligible	15
SEW-01560	Mobile Home Remains	Historic	Not eligible	15
SEW-01561	Cluster of Car Parts	Historic	Not eligible	15
SEW-01562	Indian Ditch	Historic	Not eligible	13
SEW-01563	320 Karalyssa Drive	Historic	Not eligible	13
SEW-01564	27957 Seward Highway	Historic	Not eligible	13
SEW-01565	135 Old Johns Road	Historic	Not eligible	13
SEW-01567	Garage, Storage Shed, and Residence	Historic	Pending eligibility	13
SEW-01568	29135 Seward Highway, Valley Bible Church	Historic	Not eligible	13–14
SEW-01569	29383 Seward Highway, Essential One Gas Station	Historic	Not eligible	15

Site Number	Name	Site Type	Determination of Eligibility Status	Corresponding Attachment A Page
SEW-01570	29433 Seward Highway	Historic	Not eligible	15
SEW-01571	29521 Seward Highway, Cabin on the Bird Garage Parcel	Historic	Not eligible	15
SEW-01572	210 Auriga Lane	Historic	Not eligible	15
SEW-01626	Railroad Bridge MP 89.6 Bird Creek	Historic	Assumed eligible	15

Source: OHA 2024

One Revised Statute 2477 Trail¹ (RST) was identified within the APE (ADNR 2010) (see Attachment A Map Book, Page 13). RST 111, Indian Pass Trail, crosses the Project near MP 103. The trail follows the same trajectory as trails recorded in the AHRs: SEW-00143 (Indian Valley Trail) and SEW-00257 (Girdwood-Ship Creek Connecting Trail).

The Project area has been subject to numerous cultural resource investigations, beginning during the 1970s. Most of the archaeological investigations along the Seward Highway within the Project area have been conducted on behalf of highway improvement or other State of Alaska-sponsored projects. Table 3 summarizes the cultural resources investigations that have occurred within the Project’s APE.

Table 3. Cultural resource surveys and research within the APE.

Project	Author(s)	Year of Survey	Type of Survey	Location of Survey/Research
Alaska State Park System	Dixon and Johnson	1973	Pedestrian survey	Waysides within Alaska State Parks
Alaska Parks Project	Smith	1974	Pedestrian survey	Roadhouses along Alaska highways
Alaska Railroad Study	Brown	1975	Archival research	Sites along the ARRC corridor
Potter-Girdwood Archaeological and Historic Site Survey	Reger and Antonson	1976	Pedestrian survey	Within Seward Highway ROW between MP 90–115
Beluga Point	Reger	1985	Site report	ANC-00054, near Seward Highway MP 110.5
Iditarod Trail in the Chugach National Forest	Schweigert	1999	Archival research and survey	SEW-00143, Indian Valley Trail, near Seward Highway MP 103.5
Bird Point	DePew	2000	Pedestrian survey	Bird Point
Seward Highway Bird Point to Potter Marsh Passing Lanes and Pathway Project	Reger	2001	Pedestrian survey	Along Seward Highway corridor between MP 99–115
Bird Creek Improvement Projects	Buzzell	2001	Pedestrian survey	Seward Highway MP 101.5
Sign near MP 102.9	Neely	2007	Historic structure survey	Seward Highway MP 102.9 – Diamond Jim’s Sign
Seward Highway MP 99–105	Yarborough et al.	2009	Pedestrian survey	Along Seward Highway corridor between MP 99–115
Seward Highway MP 99–105	Yarborough et al.	2010	Evaluation survey	Along Seward Highway corridor between MP 99–115
Seward Highway MP 105–107, Windy Corner Safety Improvements	Yarborough et al.	2014	Determination of Eligibility	Turnagain Arm District of the Alaska Railroad (ANC-04057)

¹ Revised Statute 2477 was originally enacted in Section 8 of the Mining Act of 1866 as a federal law authorizing the construction of roads across federal public lands. In 1976, it was repealed to enact the Federal Land Policy and Management Act (FLPMA). FLPMA preserved all Revised Statute 2477 ROW corridors for public use that existed 10 years prior to its passing and ensured that the title would be transferred through sale and perpetually be honored.

Project	Author(s)	Year of Survey	Type of Survey	Location of Survey/Research
Seward Highway MP 100–105 Improvement Project	Meitl et al.	2015	Pedestrian survey	Along Seward Highway corridor between MP 100–115
Seward Highway MP 105–107, Windy Corner Safety Improvements	Zuccotti and Kennedy	2015	Pedestrian survey	Material Site 6, between Seward Highway MP 104–105
The History of Steel Pony Truss Bridges on the Alaska Railroad	Bundy and Holt	2020	Literature review	SEW-01626, Alaska Railroad MP 86.6, Bird Creek Bridge
Safer Seward Highway Project, MP 98.5–118	Hosken et al.	2023	Pedestrian Survey	Safer Seward Highway Project Seward Highway MP 98.5 to 118: Bird Flats to Rabbit Creek
Safer Seward Highway Project, MP 98.5–118	Keen	2025	Desktop Research	Iditarod Connecting Trails (SEW-00257, SEW-00143, ANC-00279/SEW-00566)

Source: OHA 2024

HDR Engineering, Inc. (HDR) conducted pedestrian survey during the 2023 field season. This survey focused on unsurveyed areas and verifying previously documented AHRS sites to confirm location accuracy and site condition. The field effort did not result in the identification of previously undocumented sites (Hosken et al. 2024).

HDR conducted additional desktop research on the Iditarod Connecting Trails within the APE (Keen 2025). This report, included as Attachment B to this letter, explores (1) whether existing recordation sufficiently identifies the spatial relationship between the connecting trails and the APE; and (2) whether extant components and information available on the connecting trails is sufficient to apply the National Park Service’s (NPS’s) National Register Criteria for Evaluation and Aspects of Integrity for segments within the APE.

Evaluation of Effects

HDR revisited and reexamined many of the AHRS listed sites in the project APE. HDR organized the sites into six categories and made recommendations of effect for AHRS sites in the project APE (Table 4). The six categories include historic properties already determined eligible for listing on the NRHP and present in the APE; Historic properties eligible for listing but no longer present in the APE; AHRS sites determined not eligible for listing on the NRHP; AHRS sites recommended not eligible for listing on the NRHP; unevaluated sites and sites with pending evaluations of significance. Many sites were not able to be relocated and likely have been obliterated in the years since they were identified by wildfire, development, and natural decay processes.

Table 4. Determination of Eligibility status and effect recommendation for AHRS sites within the APE.

Site Number	Site Name	Determination of Eligibility Status	Recommendation of Effect
<i>Historic Properties within the APE</i>			
ANC-00054	Beluga Point	Listed (Criterion D)	No adverse effect-site avoided
ANC-00075	Potter Section House	Listed (Criterion A)	No adverse effect-site avoided
ANC-00078	ANC-00078	Eligible (Criterion D)	No adverse effect-site avoided
ANC-04057/ SEW-01613	Turnagain Arm District of the Alaska Railroad	Eligible (Criterion A)	No adverse effect
SEW-00029	Alaska Railroad	Eligible (Criterion A)	No adverse effect
SEW-00143	Indian Valley Trail	Eligible (Criterion A)	No adverse effect-site avoided
SEW-00412	Indian Valley Mine	Listed (Criterion A)	No adverse effect-site avoided
SEW-01379	Diamond Jim’s Sign	Eligible (Criterion A)	No adverse effect-site avoided

Site Number	Site Name	Determination of Eligibility Status	Recommendation of Effect
SEW-01626	Railroad Bridge MP 89.6 Bird Creek	Assumed eligible	Mitigation established through Memorandum of Agreement among ARRC, the State Historic Preservation Office, and the Federal Transit Administration
<i>Historic Properties within APE Assumed Destroyed or Not Field Verified</i>			
ANC-04349	McHugh Creek Road Weather Information System and Tower	Eligible (Criterion A)	Destroyed
SEW-00996	Historic Tent Foundations and Can Scatters	Eligible (Criterion D)	Assumed destroyed
<i>Sites Determined Not Eligible for Listing in the NRHP</i>			
ANC-00050	Mrs. Johnson's Roadhouse	Not eligible	Assumed destroyed
ANC-00124	McHugh Wasteflake Site	Not eligible	Destroyed
ANC-01962	Moen Homestead Trail	Not eligible	N/A
ANC-04069/ SEW-01557	Seward Highway	Exempt	N/A
SEW-00103	The Bird House	Not eligible	Destroyed
SEW-00131	SEW-00131	Not eligible	N/A
SEW-01044	Whittier-Anchorage Pipeline System	Not eligible	Destroyed
SEW-01075	Power Transmission Line	Not eligible	N/A
SEW-01275	Anchorage-Whittier Pipeline	Not eligible	Destroyed
SEW-01321	Very Large Can Dump	Not eligible	N/A
SEW-01559	Concrete Block Cluster	Not eligible	N/A
SEW-01560	Mobile Home Remains	Not eligible	N/A
SEW-01561	Cluster of Car Parts	Not eligible	N/A
SEW-01562	Indian Ditch	Not eligible	N/A
SEW-01563	320 Karalyssa Drive	Not eligible	N/A
SEW-01564	27957 Seward Highway	Not eligible	N/A
SEW-01565	135 Old Johns Road	Not eligible	Destroyed
SEW-01568	29135 Seward Highway, Valley Bible Church	Not eligible	N/A
SEW-01569	29383 Seward Highway, Essential One Gas Station	Not eligible	N/A
SEW-01570	29433 Seward Highway	Not eligible	N/A
SEW-01571	29521 Seward Highway, Cabin on the Bird Garage Parcel	Not eligible	N/A
SEW-01572	210 Auriga Lane	Not eligible	N/A
<i>Sites Recommended Not Eligible for Listing in the NRHP</i>			
ANC-00279/ SEW-00566	Potter Connecting Trail	Recommended not eligible	No adverse effect
SEW-00257	Girdwood-Ship Creek Connecting Trail	Recommended not eligible	No adverse effect
<i>Unevaluated Sites</i>			
ANC-00055	ANC-00055	Not evaluated	No effect-site avoided
ANC-00105	Outhouse above Beluga Point	Not evaluated	Assumed destroyed
ANC-00109	McHugh Creek Cabin	Not evaluated	Assumed destroyed
ANC-00110	Sheep Creek Cabins	No evaluated	Assumed destroyed
ANC-00816	Isle Site	Not evaluated	Avoided
SEW-00101	Indian Roadhouse Site	Not evaluated	Assumed destroyed
SEW-00126	Indian Railroad Section	Not evaluated	Assumed destroyed
SEW-00132	Indian Sawmill Site	Not evaluated	Assumed destroyed
SEW-01219	Prospect Pits	Not evaluated	Assumed destroyed/not within APE
SEW-01500	Bird Creek Knoll	Not evaluated	Assumed destroyed
<i>Sites with Pending Eligibility</i>			
SEW-01567	Garage, Storage Shed, and Residence	Pending eligibility	No adverse effect-site avoided

Note: N/A = not applicable

Historic Properties within APE

ANC-00054 (Beluga Point)

Beluga Point is listed in the NRHP under Criterion D for its potential to yield information on the prehistory of Upper Cook Inlet. It is one of the oldest sites known within the area (OHA 2024). The site has been affected by past railroad and highway construction but is located 30 meters beyond the railroad track and 45 meters from the highway (Reger and Antonson 1976). Railroad construction crews blasted a deep cut through the bedrock spur in 1916, physically separating the site from the adjacent steep hillside, and highway construction during the late 1940s and early 1950s widened the rock cut (see Figure 1). Rock quarrying activities and road reconstruction following the 1964 Good Friday Earthquake removed much of the remaining rock spur and an unknown portion of the archaeological site. A cut through the middle of the site was made with a bulldozer, presumably as part of land clearing in 1964 (Reger 1985:2-4).

During the 2023 field survey, HDR archaeologists examined the bedrock outcrop around the site, portions of which are covered by large evergreen trees. Evidence of modern recreation activities were present, such as informal paths worn into the soil, but HDR archaeologists noted no surface lithics or other artifacts (Hosken et al. 2024:86). Beyond the Alaska Railroad is the Beluga Point wayside and parking lot as well as the Seward Highway, then a steep rock face (see Figure 2; Attachment A, Page 8). Road construction activities in this location would not disturb buried cultural deposits as the site likely does not extend across the Alaska Railroad into the Seward Highway alignment. **DOT&PF finds ANC-00054 will not be adversely affected by the Project because it is horizontally removed from the vicinity of project activities.**

ANC-00075 (Potter Section House)

The 1978 NRHP nomination form for the Potter Section House underscores the importance of the property in the development of the Alaska Railroad and the city of Anchorage (Carberry 1978). The Potter Section House sits on the location of the 1916–1917 construction camp and is the only known structure from the former settlement at Potter. Of four standard plan section houses constructed in 1929, the Potter Section House is the only example still in existence and the only such building in its approximate original location (Historic Landmarks Preservation Commission 1980). Location and setting are both crucial aspects of the site's significance and integrity. The Potter Section House sits directly along the ARRC ROW and has an unimpeded view of Turnagain Arm. The scenic and strategic location, nestled between the Anchorage Bowl and the cliffs of Turnagain Arm, factored into the Alaska Engineering Commission's (AEC's) decision to select Potter for the district engineering headquarters (OHA 2024).

HDR archaeologists confirmed the location of ANC-00075 during the 2023 field survey (Hosken et al. 2024:108). The property's current condition and location matches the AHRS site card description for the site. Any disturbances to the site's setting from construction activities would be temporary in nature and end once construction is complete. The overall setting of the site would not be adversely affected since the section house would retain its location and association along the ARRC ROW. The viewshed would also remain unchanged from its current setting along the Seward Highway corridor. The treed landscape separating the section house from the highway corridor along the fence line will not be disturbed by Project activities and will remain in place, providing a buffer between the house and the highway (Figure 5; Attachment A, Page 4). **DOT&PF finds the Project would have no adverse effect to the Potter Section House (ANC-00075) because it will be avoided by Project activities.**

ANC-00078

ANC-00078 is a lithic site found eligible for listing in the NRHP under Criterion D for its potential to yield information about the prehistory of Turnagain Arm. The site contains buried cultural material that could provide information important to the prehistory of the region (OHA 2024).

HDR archaeologists visited ANC-00078 in 2023 and observed approximately two dozen surface lithics in a blowout between two spruce trees. HDR archaeologists did not collect artifacts and did not conduct subsurface testing; materials observed included various colors of chert and chalcedony (Hosken et al. 2024:98). The site is separated from the Project by the Alaska Railroad (Attachment A, Page 6). The site is located on an isolated bedrock outcrop partially destroyed by construction of the railroad and wave erosion. It is subject to wave action during high tides and storm winds (Reger and Antonson 1977: IV-20). It is unlikely that the site extends into and beyond the Seward Highway prism. **DOT&PF finds that the Project will have no adverse effect to ANC-00078 as project activities are separated spatially from site boundaries by the Alaska Railroad right of way.**

SEW-00029 (Alaska Railroad) and ANC-04057/SEW-01613 (Turnagain Arm District)

Site numbers SEW-00029 and ANC-04057/SEW-01613 refer to the segment of the Alaska Railroad that runs from Rainbow to Potter and is part of the Turnagain District of the Alaska Railroad. This section of the railroad was completely relocated to an adjacent and parallel alignment on fill, with the Seward Highway constructed on the former roadbed of the railroad between 1949 and 1951. The character-defining feature of the railroad corridor is the 36.6 miles of historic-age railbed and railroad appropriate elements (Schmidt and Pratt 2007). This property was determined eligible for listing in the NRHP in 2015 under Criterion A for its demonstrable association with transportation, economic development, and settlement (OHA 2024). Prior improvements to the Seward Highway have not adversely affected this historic property. For example, the MP 88 Variant project which included realignment of the railroad was determined to have no adverse effect to the historic property (Mulcahy 2015).

The proposed Project would shift approximately 7 miles of railroad alignment and tracks to accommodate the widened highway and straightened highway curves at these locations:

- MP 117.7 to 115.3 (Rifle Range to Potter Section House; approximately 12,300 feet [2.3 miles])
- MP 115.1 to 114.9 (south of Potter Creek; approximately 1,300 feet [0.25 mile])
- MP 112.25 to 111.5 (McHugh; approximately 4,700 feet [0.9 mile])
- MP 110.25 to 109.5 (Beluga; approximately 3,700 feet [0.7 mile])
- MP 108.6 to 108.3 (Rainbow; approximately 1,600 feet [0.3 mile])
- MP 106.8 to 105.4 (Windy Corner to Falls Creek, 7,700 feet [1.4 miles])
- MP 104.25 to 103 (Indian Peak to Indian Creek: 6,500 feet [1.2 miles])

Existing sidings (double track) and access points for ARRC maintenance vehicles would be maintained. One railroad bridge (Railroad Bridge 88.1, Indian Creek²) and culverts would be extended, replaced, or upgraded as needed to meet current standards. All relocated or reconstructed sections of track would include coastal armoring and expanded embankment width to allow room for a second track to be added in the future. The grade of the railroad would remain above the existing highway and the tracks would continue to follow the same route at the base of the bluff along Turnagain Arm.

The reconstructed track would continue retain the features that make the Alaska Railroad Turnagain Arm district significant with in-kind replacements in the listed segments. These features resemble those used during the reconstruction of the railroad that preceded construction of the Seward Highway in 1949-1951. The proposed Project would have no adverse effect to this property because the railroad would continue to conform to the same general alignment with relocations in 7 of 19.5 miles of project length, or 36.6

² The current bridge at Indian Creek, Bridge 88.1, is less than 20 years old.

miles of railroad in the AHRs designated property boundaries. The railroad including the 7 relocated miles would retain the same features and continue to convey its historic function and the configuration of the roadway (i.e., rails, ties, ballast, ditches); the use of in-kind materials is consistent with other replacements and upgrades made throughout the railroad corridor; the setting of the historic property would remain unchanged along Turnagain Arm; and the historic property would still convey the feeling of a historic period mode of transportation for the period of significance after construction of the Seward Highway. **DOT&PF finds the proposed Project would have no adverse effect to the Alaska Railroad (SEW-00029) and the Turnagain Arm District (ANC-04057/SEW-01613).**

SEW-00143 (Indian Valley Trail)

This trail is associated with the INHT system and was an important part of the history of Cook Inlet. The INHT was designated a National Historic Trail in 1978 under the National Trails System Act. The INHT system consists of a primary route of 2,000 miles between Seward and Nome, and over 1,300 miles of connecting trails (Yarborough et al. 2009:17).

This trail is a segment of the INHT that had been established by 1907. The SEW-00143 segment is approximately 1 mile long. The remainder of the trail to Indian Creek Pass is designated ANC-00281 (Hosken et al. 2024:23). SEW-00143 follows the same trajectory as RST 111, Indian Pass Trail (Hosken et al. 2024:27). SEW-00143 was determined eligible for listing in the NRHP in 1999 for its association with the INHT (OHA 2024).

The trail runs northward from Turnagain Arm and along Indian Creek from the community of Indian to Indian Pass. It then follows Ship Creek through Ship Creek Valley to the flats at the base of the Chugach Mountains (Attachment A, Page 13). The modern terminus of the trail is at Arctic Valley Road (Yarborough et al. 2009:22).

The trail intersects the current Project near Seward Highway MP 103, near the intersection of Boretide Road and the Seward Highway. The AHRs database shows the trail bisecting SEW-01564 (27957 Seward Highway, Turnagain House) as the trail heads northward from the highway (Attachment A, Page 13). HDR archaeologists did not identify any surface indications of the trail during the 2023 survey; the area adjacent to the road corridor is developed, with roads, driveways, structures, and parking lots (Hosken et al. 2024:58). Review of historic editions of maps of the Seward quadrangle and the Seward D-7 map show variances in the location of the trail over time from 1951, 1954 and 1968, when the trails are replaced by roads (Figure 3). The trail branched to connect to the Indian section house (SEW-00126) to the west while another branch went to the roadhouse (SEW-00101) west of Indian Creek in USS 3215. This is visible in air photos of the area (Figure 4).

The Indian Valley Trail (SEW-00143) falls within the APE of the Project but lies outside any areas of anticipated ground disturbance (Attachment A, Page 13). Additionally, access routes to the trail consist of roads that would not be adversely affected by the Project. Any potential ground disturbance occurring near the trail would be confined to previously disturbed areas along the road corridor, which would not result in an adverse effect to the property. **DOT&PF finds the Indian Valley Trail (SEW-00143) would not be adversely affected by the Project because it is no longer present in the APE.**

SEW-00412 (Indian Valley Mine)

The Indian Valley Mine is listed in the NRHP under Criterion A for its association with mining activities on the northern side of Turnagain Arm after the Alaska Gold Rush era. The site sits on a steep slope facing south toward Turnagain Arm. Contributing resources to the NRHP property include a log cabin, a log assay office, a gully to bring water to the site, and a re-opened mine shaft. Non-contributing resources include a trailer; a 20-year-old frame cabin; timber remains from the blacksmith shop that deteriorated

during the 1980s; the parking area; and assorted other recent, small buildings. The assay office and log cabin occupy a central location high on the slope. The ditch runs a few yards east of the cabin. The mine shaft is due west of the assay office (OHA 2024). The property is in its original location and appears to retain its integrity of setting and location, although HDR archaeologists did not access private property parcels during their 2023 field survey (Hosken et al. 2024).

Project activities within this area would be contained within the existing DOT&PF ROW and would not encroach north of the mine's parking lot (see Attachment A, Page 12). Project activities may occur within the parking lot, including cut/fill to add a frontage road, but the parking lot has been determined to be a non-contributing resource to the NRHP property. See Figure 6 for view of the parking lot, log cabin, and assay office. The overall setting of the site would not be adversely affected by the Project as the mine and its contributing properties would retain their current viewshed along the Seward Highway corridor. Any disturbances to the site's setting from construction activities would be temporary in nature and end once construction is complete. **DOT&PF finds that the Project would have no adverse effect to the Indian Valley Mine as the significant elements of the property will be avoided by Project activities.**

SEW-01626 (Railroad Bridge MP 86.6, Bird Creek)

SEW-01626 is the railroad trestle over Bird Creek, located south of Seward Highway MP 101.5 at Alaska Railroad MP 86.6 (See Attachment A, Page 15). The AHRS site record notes that various railroad bridges have preceded the existing structure, including the original 1917 timber trestle, a bridge built in 1918, and an 80-foot through girder span erected in 1936 (OHA 2024). Following a series of modifications between 1952 and 1985, ARRC replaced the through girder span with a 123-foot pony truss span, previously removed from Alaska Railroad MP 147.1, in 1997. The pony truss span rests on two concrete piers and one 14-foot approach span on each end. The current AHRS site record indicates the bridge is proposed to be replaced (OHA 2024). SEW-01626 has not been formally assessed for NRHP eligibility; however, Bundy and Holt (2020:17) assumed the bridge is eligible.

As of the 2023 survey, the bridge had not been replaced. HDR archaeologists noted the pony truss bridge, concrete piers, and approach spans as described in the SEW-01626 site record. Wooden piles observed in the streambank below the bridge may be remnants of the earlier bridge structures (Hosken et al. 2024:47).

SEW-01626 is an "assumed eligible" property. The ARRC, State Historic Preservation Officer (SHPO), and Federal Transit Administration signed a Memorandum of Agreement in 2017 to mitigate adverse effects to pony truss bridges on the Alaska Railroad system. The compilation of historic documentation regarding these bridges, including the bridge at Alaska Railroad MP 86.6, in Bundy and Holt (2020) fulfills the mitigation requirement for this property. **DOT&PF finds that no additional mitigation for adverse effects to the bridge is required as it is already subject to removal under another project.**

SEW-01379 (Diamond Jim's Sign)

The neon Diamond Jim's Sign (SEW-01379) is 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 for its association with the 1964 Good Friday Earthquake and subsequent recovery. Currently, only the sign is eligible for listing in the NRHP and not the associated building (OHA 2024). A Determination of Eligibility (DOE) for the entire property remains pending as of 2015, when SHPO requested more information regarding a property description or condition assessment of the property (Bittner 2015).

HDR archaeologists confirmed the accuracy of the plotted AHRS point of the sign during their 2023 field survey (Hosken et al. 2024:61). The current site condition matches the AHRS site card description. Project activities at this location would avoid the sign and other buildings within the vicinity (Figure 7.;

Attachment A, Page 13). The overall setting of the site would not be adversely affected by the Project as the sign would retain its current viewshed along and association with the Seward Highway corridor. Any disturbances to the site's setting from construction activities would be temporary in nature and end once construction is complete. **DOT&PF finds the Project would have no adverse effect to the Diamond Jim's sign (SEW-01379) as it will be avoided by Project activities.**

Historic Properties Assumed Destroyed or Not Located during 2023 Survey

ANC-04349 (McHugh Creek Road Weather Information System and Tower)

This site was an ACS Alascom microwave tower and adjacent block structure located on the Turnagain Arm side of the highway across the railroad tracks on a point of land leveled for railroad construction near Seward Highway MP 111.3 (Attachment A, Page 6–7). A DOT&PF Road Weather Information System (RWIS) sensor system and electrical supply were formerly attached to the mast. ANC-04349 was found eligible for listing in the NRHP under Criterion A for its association with the Cold War communications system in Alaska and as a contributing element to the Turnagain Arm District of the Alaska Railroad (OHA 2024).

Upon visiting the ANC-04349 site location in 2023, HDR archaeologists found that the RWIS tower and block structure had been completely removed and therefore retains no aspects of integrity. Some metal shelving and assorted debris remained at the site, including a large drum-like component from one of the RWIS tower's microwave antennae (Hosken et al. 2024:96). Construction updates indicate that DOT&PF Project CFHWY00428 intended to install a new tower nearby (DOT&PF 2022). **DOT&PF finds the Project would have no effect to ANC-04349 as the historic structures have been obliterated or removed and therefore cannot be eligible due to loss of integrity.**

SEW-00996 (Historic Tent Foundations and Can Scatters)

This site was found eligible for listing in the NRHP in 2003 under Criterion D for its potential to contribute to knowledge about events and culture of the 1930s along Turnagain Arm (OHA 2024). In 2010, DOT&PF staff attempted to locate the site at the request of SHPO, but results were inconclusive. DOT&PF identified a single can and a mossy berm, which may have been a fallen log, according to the investigators (Mulcahy 2010).

In 2023, HDR archaeologists extensively searched the hillside around the AHRS site point near MP 102.1 (Attachment A, Page 14) and were unable to locate either the foundations or can scatters. HDR archaeologists also examined the base of the slope west of the site to search for potential refuse toss zones. HDR archaeologists found no historic-age materials. Despite the lack of cultural remains, the area investigated appeared consistent with that described by previous investigators, who describe a slope southwest of the highway with spruce and birch trees. HDR recommends that the site is either mis-plotted or no longer extant (Hosken et al. 2024:54). **DOT&PF finds the Project would have no effect to SEW-00996 as the site has been obliterated or removed from the Project APE.**

Properties with NRHP Eligibility Pending

SEW-01567 (Garage, Storage Shed, and Residence)

This site consists of three buildings: a 1965 garage, a 1965 storage shed, and a 1968 residence (OHA 2024). Two of the buildings—the garage and residence—are associated with the theme of the 1964 Good Friday Earthquake and recovery (Meitl et al. 2015:52). DOT&PF (Hilsinger 2015)

recommended these buildings as eligible for listing in the NRHP under Criterion A, but SHPO requested additional information to strengthen the statement of significance (Bittner 2015).

In 2023, HDR archaeologists confirmed the location of SEW-01567. The three buildings associated with the site number are still standing and in similar condition as described in 2015. It is located outside the DOT&PF ROW and Project footprint (see Attachment A, Page 13). While within the viewshed of SEW-01567, the Project does not have the potential to adversely affect this property; therefore, additional research for an expanded DOE is not recommended. **DOT&PF finds the Project would have no adverse effect to SEW-01567 as Project activities would not affect the structures.**

Sites Previously Determined Not Eligible for Listing in the NRHP

The AHRS sites described below are located within the APE and have been previously determined not eligible for listing in the NRHP. DOT&PF recommends no changes to the eligibility status of these properties. **No mitigation is recommended for these sites since they have been determined not eligible for listing in the NRHP and are therefore not historic properties.**

ANC-00050 (Mrs. Johnson's Roadhouse)

Mrs. Johnson's Roadhouse was a historical roadhouse reportedly in operation before and during the construction of the Alaska Railroad and may have been associated with the historic Iditarod Trail. A 1916 AEC map shows a roadhouse south of the Potter Camp, near what is now the Potter Creek Trailhead, although the exact site location was not verified (OHA 2024; see Attachment A, Page 4).

This site was found not eligible for listing in the NRHP in 2002 as it does not offer important information that would better our understanding of the history of Anchorage. Although the roadhouse operated prior to the construction of the Alaska Railroad and may have been associated with the INHT, present information does not prove association between the trail and roadhouse (OHA 2024). HDR archaeologists were unable to locate this site during the 2023 field investigation (Hosken et al. 2024:106). It is assumed destroyed. **DOT&PF finds that ANC-00050 would not be affected as the site has been obliterated and thus lacks integrity.**

ANC-00124 (McHugh Wasteflake Site)

In 1977, archaeologists collected 29 red chert waste flakes, 1 chalcedony flake, 1 waste flake of unidentified material, and 1 shell button from the surface at this site, located on a bedrock ridge approximately 250 meters west of the McHugh Creek parking area and 100 meters north of Seward Highway MP 111.9 (OHA 2024; Attachment A, Page 7). Investigations in 2001 confirmed that chert flakes remained present on the bluff (Reger 2001:17–18).

This site was found ineligible for listing in the NRHP in 2003 because the flakes recovered at the site were found on the surface and were not diagnostic of any cultural group or stage. The site was determined to not contain information important to prehistory (OHA 2024). Following completion of the DOE, DOT&PF removed approximately 18 meters of the bluff face, including areas where the flakes had previously occurred (Reger 2001).

During the 2023 field investigation, HDR archaeologists observed no surface lithics nor other artifacts. HDR archaeologists also inspected three bedrock outcrops near the site point, including an outcrop west of the site point, directly below the paved overlook; a second outcrop located another 50 meters west of the overlook; and a third outcrop located along the trail, approximately 65 meters northwest of the ANC-00124 site point. HDR archaeologists observed no artifacts at any of these locations (Hosken et

al. 2024:93). **DOT&PF finds that ANC-00124 would not be affected by the Project as the site has been previously determined not eligible for listing on the NRHP.**

ANC-01962 (Moen Homestead Trail)

The Moen Homestead Trail (ANC-01962) was built in 1951 by the Moen family to access their South Anchorage homestead (Wanzenried 2018). The trail extends from the Seward Highway near MP 115.3 and winds northeastward for approximately 1 mile. This site was found ineligible for listing in the NRHP in 2018 as DOT&PF determined it did not meet any NRHP eligibility criteria (OHA 2024).

During the 2023 field investigation, HDR archaeologists inspected the southwestern end of ANC-01962 where it meets the Seward Highway. The AHRS line roughly aligns with a private driveway at this location (Attachment A, Page 4). HDR archaeologists observed no historical remains from the ROW (Hosken et al. 2024:111). **DOT&PF finds the ANC-01962 would not be affected by the Project as it is not eligible for listing on the NRHP.**

SEW-00103 (The Bird House)

The Bird House was an L-shaped building located on the eastern side of Konikson Road near Seward Highway MP 100.5. The structure consisted of several joined log cabin structures dating between circa 1903 and the 1920s, plus several additions made during the 1960s (OHA 2024). Starting in the 1960s, the Bird House operated as a bar and tourist destination.

This site was found ineligible for listing in the NRHP in 1980 by the Alaska Historical Commission (AHC). Although the AHC found the resource ineligible, its AHRS card indicates it was considered significant for its historic association with the search for gold along Turnagain Arm around the turn of the twentieth century and for its contribution as a work camp (1916–1917) during construction of the Alaska Railroad along the northern shore of Turnagain Arm. The site was destroyed by fire in 1995 (OHA 2024).

HDR archaeologists did not locate any remnants of the site during the 2023 field survey. Much of the area near the AHRS site point has been cleared for the construction of a large, paved path and for developments near the Bird Garage (Attachment A, Page 15; Hosken et al. 2024:41). **DOT&PF finds that SEW-00103 would not be affected by the Project as it is ineligible for listing and lacks integrity due to destruction by fire.**

SEW-00131

In 1975, Reger and Antonson (1977: IV-20) identified this site as a lithic scatter located on a rock bluff overlooking Seward Highway MP 106.7 (Attachment A, Page 10). Most flakes were found on the surface, although some were buried in shallow pockets of sediment in bedrock depressions. The site was extensively disturbed by tower construction. In 2001, Reger (2001:12–14) recovered surface artifacts, but subsurface testing results were negative. Reger (2001) also described a destroyed steel and concrete tower base at the bluff's edge as well as a milled lumber platform north of the site that were not present during the 1975 survey.

This site was found ineligible for listing in the NRHP in 2003. Because all artifacts were surface finds recovered without stratigraphic context, the site was determined not eligible for listing in the NRHP because it lacked integrity (OHA 2024).

HDR archaeologists inspected the SEW-00131 site vicinity and did not observe any lithics at the surface. HDR archaeologists noted the metal tower base and wooden platform described by Reger in 2001 as still

present indicating that the AHRS site location is correct (Hosken et al. 2024:75). **DOT&PF finds that no adverse effect would occur to SEW-00131 as it is not eligible for listing on the NRHP.**

SEW-01044 (Whittier-Anchorage Pipeline System)

The Whittier to Anchorage pipeline system (district) includes a fuel dock, buried and above-ground pipelines, terminals, and pumping stations. The 8-inch diameter and 61.7-mile-long pipeline connected the Whittier and Anchorage fuel terminals (OHA 2024).

This site was found ineligible for listing in the NRHP in 2003. Because the Anchorage Terminal is no longer extant, the Whittier-Anchorage Pipeline lacks integrity and was determined not eligible for listing in the NRHP (OHA 2024). HDR archaeologists saw no surface indication of the pipeline system during the 2023 field survey (Hosken et al. 2024:58). **DOT&PF finds the Project would have no adverse effect to SEW-01044 as it is not eligible for listing on the NRHP.**

SEW-01075 (Power Transmission Line)

This site is a 90.4-mile-long transmission line built in 1962 to carry hydroelectric power from Cooper Lake to Anchorage. The line now carries power produced at Cooper Lake, Bradley Lake, and Nikiski (OHA 2024). The Seward quadrangle portion of the line was evaluated in 2005 and determined to be ineligible for listing in the NRHP. In 2012, both the Seward and Anchorage quadrangle portions were evaluated together and again determined to be ineligible for listing in the NRHP due to their deterioration and lack of significant associations with events, trends, or people (OHA 2024). The transmission line was documented throughout the 2023 survey area (see Attachment A, Pages 13–16; Hosken et al. 2024). **DOT&PF finds that SEW-01075 would not be affected by the Project as it is not eligible for listing on the NRHP.**

SEW-01275 (Anchorage-Whittier Pipeline)

This site number refers to the pipeline associated with the Whittier-Anchorage Pipeline historic district (SEW-01044/ANC-01832). The site was found ineligible for listing in the NRHP in 2003 because the Anchorage Terminal is no longer extant and therefore lacks integrity (OHA 2024). HDR archaeologists saw no surface indication of the pipeline system during the 2023 field survey (Hosken et al. 2024:58). **DOT&PF finds that SEW-01275 would not be affected by the Project as it is not eligible for listing on the NRHP.**

SEW-01321 (Very Large Can Dump)

In 2006, this site consisted of a large number and variety of identifiable glass, ceramic, and steel containers as well as tires discarded over a steep slope from a raised landform (Yarborough et al. 2009). When the site was resurveyed in 2019, it was discovered that a new driveway, gravel pad, vegetation management, and other ground disturbing activities may have buried the site (OHA 2024).

The site was found ineligible for listing in the NRHP in 2019 due to loss of integrity from site destruction (OHA 2024). HDR archaeologists inspected the site vicinity during 2023 and noted the raised gravel driveway and a metal gate posted with “No Trespassing” signs (Attachment A, Page 15). No artifacts were noted (Hosken et al. 2024:40). **DOT&PF finds that SEW-01321 would not be affected by the project as it is not eligible for listing on the NRHP.**

SEW-01557/ANC-04069 (Seward Highway)

The Seward Highway is approximately 125 miles long and stretches between Seward and Anchorage. The non-Interstate portion of the highway (MPs 0–37) was evaluated for the NRHP in 2019 and was determined not eligible due to changes outside the period of significance that resulted in a loss of integrity of design, location, and feeling. The portion of the Seward Highway designated as Interstate Highway (MPs 37–124) is exempt from Section 106 review under the 2005 Interstate Exemption, which includes both SEW-01557 and ANC-04069 (OHA 2024). **DOT&PF finds that the Seward Highway (SEW-01557/ANC-04069) is exempt from consideration of its eligibility under the terms of the March 10, 2005, Exemption Regarding Historic Preservation Review Process for Effects to the Interstate Highway System issued by the ACHP.**

SEW-01559 (Concrete Block Cluster)

In 2014, archaeologists noted five large, square, concrete blocks scattered over a roughly 225-square-foot area below the powerline paralleling the Seward Highway. The blocks were covered with a thick growth of moss, suggesting they have been in this location for quite some time. The site was determined not eligible for listing in the NRHP in 2015 because it is of unknown age, had no apparent historical association, and was not sufficiently significant to be eligible (Bittner 2015; OHA 2024; Meitl et al. 2015).

HDR archaeologists were unable to locate SEW-01559 at its AHRS plotted location (Attachment A, Page 15). Aerial imagery shows that much of the vegetation around the site has been cleared since it was documented in 2014 (Hosken et al. 2024:42). **DOT&PF finds that SEW-01559 will not be affected by the Project because it has been obliterated and is not eligible for listing on the NRHP.**

SEW-01560 (Mobile Home Remains)

This site consists of the dilapidated remains of a mobile home on the slope north of Seward Highway MP 100.7 (Attachment A, Page 15; Meitl et al. 2015:15–16). SEW-01560 was found ineligible for listing in the NRHP in 2015 as it lacks the historical association or ability to provide important information necessary to be considered eligible for listing in the NRHP (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR successfully located SEW-01560 and confirmed the site location within the APE. The mobile home is in very poor condition (Hosken et al. 2024:43–44). **DOT&PF finds that there would be no effect to SEW-01560 as it is not eligible for listing on the NRHP.**

SEW-01561 (Cluster of Car Parts)

This site was documented in 2014 and consisted of a cluster of car parts in the wooded area between the Essential One gas station and Stellar Jay Lane along the Seward Highway (Attachment A, Page 15). The site was determined not eligible for listing in the NRHP in 2015 because its age was unknown and was determined not historically significant (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR archaeologists observed the site vicinity from the Seward Highway ROW but were unable to see any indication of the car parts during the 2023 survey (Hosken et al. 2024:46). **DOT&PF finds that SEW-01561 would not be affected by the Project as it is not eligible for listing on the NRHP.**

SEW-01562 (Indian Ditch)

An earthen ditch, which was oriented north-northeast and approximately 4 feet wide, 2 feet deep, and of unknown length, was identified in 2014 approximately 160 feet north of Seward Highway MP 103.7

(Attachment A, Page 13). While little is known about the ditch feature and its function, it may date to the 1930s. The site was determined not eligible for listing in the NRHP due to lack of significance (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR archaeologists located the southern end of the ditch and its associated berm during their 2023 field survey. No other artifacts were observed in association with the ditch (Hosken et al. 2024:67). **DOT&PF finds that no effects would occur to SEW-01562 as it is not eligible for listing on the NRHP.**

SEW-01563 (320 Karalyssa Drive)

This site is located north of the Seward Highway at MP 103.5 (Attachment A, Page 13). The building consists of various sections constructed between approximately 1953 and 1978, including a one-story section with an angled gable roof, a one-story section with a shed roof, a two-story section with gable and shed roofs, and several other additions. Due to the numerous additions and alterations, a 2015 DOE concluded that SEW-01563 lacked integrity and was ineligible for listing in the NRHP (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR photographed SEW-01563 from the highway ROW. The structure appears generally as described in the AHRS database. HDR also noted an ATCO-style trailer, apparently modern, at the rear of the property (Hosken et al. 2024:66). **DOT&PF finds that no effects would occur to SEW-01563 as it is not eligible for listing on the NRHP.**

SEW-01564 (27957 Seward Highway, Turnagain House)

SEW-01564 is a commercial structure located at MP 103.1 of the Seward Highway (Attachment A, Page 13). It is composed of two sections: a single-story, gable-roofed section on the east and a two-story, gable-roofed addition on the west. The single-story section is the older half and was built in Portage prior to the 1964 Good Friday Earthquake, after which it was moved to Indian. The site was determined not eligible for listing in the NRHP in 2015 due to its loss of integrity of design and materials (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR's inspection of the site in 2023 indicated the building is extant and matches the AHRS site card description (Hosken et al. 2024:65). **DOT&PF finds that no effects would occur to SEW-01564 as it is not eligible for listing on the NRHP.**

SEW-01565 (135 Old Johns Road)

The AHRS record for this site describes three structures northwest of Seward Highway MP 103 (Attachment A, Page 13). The buildings include a one-story, gable-roofed residence and a shed, both built in 1962, and a second shed of more recent construction. The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any of NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR was unable to see the site from the highway ROW during the 2023 field survey. Inspection of aerial imagery indicates the main structure was removed between 2015 and 2018. Municipal tax records do not list a building value for this parcel after 2017, and it is assumed the property was demolished (Hosken et al. 2024:63). **DOT&PF finds that no effects would occur to SEW-01565 as it is not eligible for listing on the NRHP.**

SEW-01568 (29135 Seward Highway, Valley Bible Chalet)

This property is currently occupied by the Valley Bible Chalet and is located at Seward Highway MP 102.8 (Attachment A, Page 13). It consists of a two-story, A-frame structure built in 1969, a one-story gable-roofed addition, a 1970s-era cabin, a greenhouse, and a gable-roofed outbuilding. The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR examined the site from the Seward Highway ROW in 2023 and confirmed that the site is extant and matches the AHRS site card description (Hosken et al. 2024:59). **DOT&PF finds that no effects would occur to SEW-01568 as it is not eligible for listing on the NRHP.**

SEW-01569 (29383 Seward Highway, Essential One Gas Station)

This site (Attachment A, Page 15) consists of a concrete-block building currently housing the Essential One Gas Station; a small, concrete-block shed; and three steel canopies over the fuel pumps. The main building and shed date to 1968, while the canopies were constructed more recently. The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR archaeologists inspected SEW-01569 from the Seward Highway ROW, and confirmed the site is extant and matches the AHRS site card description (Hosken et al. 2024:46). **DOT&PF finds that no effects would occur to SEW-01569 as it is not eligible for listing on the NRHP.**

SEW-01570 (29433 Seward Highway)

SEW-01570 is the Bird Motel and Restaurant built at Seward Highway MP 100.8 in 1968 (Attachment A, Page 15). The property includes a one-story office, restaurant, and motel. The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR inspected SEW-01570 from the Seward Highway ROW, and confirmed the site is extant and matches the AHRS site card description (Hosken et al. 2024:44). **DOT&PF finds that no effects would occur to SEW-01570 as it is not eligible for listing on the NRHP.**

SEW-01571 (29521 Seward Highway, Cabin on the Bird Garage Parcel)

SEW-01571 is a small log cabin on the parcel where the Bird House (SEW-00103) was previously located (Attachment A, Page 15). According to municipal tax records, the cabin was built in 1981. However, Cultural Resources Specialists LLC (CRC) archaeologists suggested that this date represents the year when the cabin was moved to the parcel, and that the cabin was built considerably earlier (Meitl et al. 2015:42–43). The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR archaeologists inspected SEW-01571 from the Seward Highway ROW, and confirmed the site is extant and matches the AHRS site card description (Hosken et al. 2024:42). **DOT&PF finds that no effects would occur to SEW-01571 as it is not eligible for listing on the NRHP.**

SEW-01572 (210 Auriga Lane)

SEW-01572 is a one-story, wood-framed residence built in 1952 and located within a wooded area on the northern side of Seward Highway at MP 100.4 (Attachment A, Page 15). CRC first documented this site

during 2015, at which point the architectural historian noted the house was “undergoing renovation and has had several recent additions” (Meitl et al. 2015:44). The site was determined not eligible for listing in the NRHP in 2015 as it did not meet any NRHP eligibility criteria (Bittner 2015; Meitl et al. 2015; OHA 2024).

HDR archaeologists inspected SEW-01572 from the highway ROW, and confirmed the house is mapped correctly. Due to vegetation and distance from the ROW, HDR was unable to determine the extent of the renovations and additions described by CRC (Hosken et al. 2024:40). **DOT&PF finds that no effects would occur to SEW-01572 as it is not eligible for listing on the NRHP.**

Sites Recommended Not Eligible for Listing in the NRHP

SEW-00257 (Girdwood-Ship Creek Connecting Trail)

This trail is part of the INHT system. It runs along Turnagain Arm from Girdwood to Indian Creek and follows the Indian Valley Trail (SEW-00143/ANC-00281) to Ship Creek (Attachment A, Pages 13–16). Completion of the trail from Girdwood to Indian Creek in 1908 provided an alternate route to the Crow Pass Trail (Hosken et al. 2024:23). Within the Project’s APE, the trail follows the same trajectory as SEW-00143, Indian Valley Trail, and RST 111, Indian Pass Trail (Hosken et al. 2024:27; Keen 2025).

HDR observed no evidence of SEW-00257, SEW-00143, or RST 111 during the 2023 survey. Archaeologists inspected Boretide Road, where both SEW-00143 and SEW-00257 turn northward into Indian Valley, and the area where SEW-00566 intersects Indian Valley Road (Hosken et al. 2024:58).

Criterion A

Prior research of the trail indicates it was established to assist the transportation of people and goods during key moments in Alaska’s development: the gold rush era (turn of the century), Alaska Railroad construction (circa 1905–1923), and Seward Highway construction (1950s). Connecting Seward and nascent communities along Turnagain Arm with local mines and providing access for laborers and machinery to forge more permanent transportation routes through the region via rail and highway, the connecting trails within the APE served an important role in the population and economic growth of the region. Thus, the Girdwood-Ship Creek Connecting Trail (SEW-00257) has significance within the context of this study, in keeping with the previously determined NRHP-eligible Indian Valley Trail (SEW-00143). As a contributing feature of the INHT, the period of significance is 1906 to 1940.

Criterion B

DOT&PF recommends that SEW-00257 is not significant under Criterion B. The trail is not associated with individuals who made significant contributions to our local, state, or national historic context.

Criterion C

DOT&PF recommends that SEW-00257 is not significant under Criterion C. The trail does not represent the work of a master nor does the trail possess high artistic value.

Criterion D

DOT&PF recommends that SEW-00257 is not significant under Criterion D. The trail is not likely to yield additional information that would contribute to our understanding of human history. No prehistoric

or historic subsurface archaeological resources have been identified in association with the trail within the APE.

Integrity

As illustrated by recent field investigations SEW-00257 has intermittent, discontinuous and negligible physical evidence within the APE. Paths are cut into the steep slope, and more recently cleared trails are removed from and at a higher elevation from the Project's transportation corridor. Segments or elements of the trail are still extant and visible components of the connecting trails, but they are not continuous and disappear when in the railroad and highway ROW vicinity.

The limited physical evidence of the trails within the APE diminishes their integrity of location, design, setting, feeling, and association. NPS (1995:44) states: "The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance."

One of the four steps in assessing a resource's integrity is determining whether its essential physical features are visible enough to convey its significance (NPS 1995:45). NPS states:

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction (NPS 1995:46).

Based on results of the recent cultural resources investigations, physical features of the trails are no longer extant or visible within the APE at the elevation of the Seward Highway corridor. Trail segments high above the roadway, some of which have been reconstituted and cleared for recreational use (e.g., the Turnagain Arm Trail in Chugach State Park), are recognizable as components of the early connecting trails; however, these segments are not subject to impacts from the Project. Overall, the loss of numerous resources associated with the original trails, especially via railroad and Seward Highway construction, has impacted the integrity of the three connecting trails within the APE (Keen 2025). **DOT&PF finds that SEW-00257 does not retain sufficient integrity within the Project's APE to be considered eligible or contributing to any NRHP historic property (Keen 2025).**

ANC-00279/SEW-00566 (Potter Connecting Trail)

This trail is part of the INHT system and runs from Indian Creek where the Indian Valley Trailhead (SEW-00143) is located to Potter Creek (Attachment A, Page 9–13). This portion of the trail in the Seward quadrangle runs from Indian Creek westward along the northern shore of Turnagain Arm to just south of Rainbow (ANC-00113). It is also known as Johnson Trail (Yarborough et al. 2009:21).

In 2001, archaeologists surveyed the ROW corridor for the Seward Highway Bird Point to Potter Marsh Passing Lanes and Pathway Project (MPs 99 to 115). Archaeologists identified ANC-00279/SEW-00566 at various points along the Project area, generally uphill and away from the Project limits (Reger 2001:14), although actual locations or photographs of the trail are not provided in the report.

In 2007, CRC archaeologists documented a 10-foot-wide trail cut into a steep slope of a hillside north of the highway and west of the Indian Valley Mine and speculated that the trail is part of SEW-00566. Archaeologists followed the trail for approximately 0.1 mile, trending west-northwest (Yarborough et al. 2009:22). Photographs or maps showing the location of the trail are not included in the report.

DOWL archaeologists carried out a pedestrian survey during March 2015 on behalf of the Windy Corner Project. SEW-00566 was potentially within the 2015 survey area, but archaeologists could not positively identify the trail (Zuccotti and Kennedy 2015).

HDR attempted to identify the location of the INHT (SEW-00143, SEW-00257, and SEW-00566) as it passes through Indian. HDR observed no evidence of historic-age trails (Hosken et al. 2024:58).

Criterion A

Based on prior research (see Keen 2025), both the Girdwood-Ship Creek Connecting Trail (SEW-00257) and the Potter Connecting Trail (ANC-00279/SEW-00566) share historic context with the Indian Valley Trail (SEW-00143). The period of significance is 1906 to 1951. In each case, a trail was established to assist the transportation of people and goods during key moments in Alaska's development: the gold rush era (turn of the century), Alaska Railroad construction (circa 1905–1923), and Seward Highway construction (1950s). Connecting Seward and nascent communities along Turnagain Arm with local mines and providing access for laborers and machinery to establish permanent transportation routes through the region via rail and later highway, the connecting trails within the APE served an important role in the population and economic growth of the region. The Potter Connecting Trail (ANC-00279/SEW-00566) has significance within the context of this study where physical elements of the trail exist intact, in keeping with the previously determined NRHP-eligible Indian Valley Trail (SEW-00143).

Criterion B

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion B. The trail is not associated with individuals who made significant contributions to our local, state, or national historic context.

Criterion C

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion C. The trail does not represent the work of a master and does not possess high artistic value.

Criterion D

DOT&PF recommends that ANC-00279/SEW-00566 is not significant under Criterion D. The trail is not likely to yield additional information that would contribute to our understanding of human history. No prehistoric or historic subsurface archaeological resources have been identified in association with the trail within the APE.

Integrity

As illustrated by recent field investigations, the Potter Connecting Trail has intermittent, discontinuous, or negligible physical evidence within the APE. Paths cut into the steep slopes and more recently cleared recreational trails are removed horizontally from and at a higher elevation than the Project's transportation corridor. The surviving elements are not continuous and disappear in the vicinity of the railroad and highway ROWs.

The absence of physical evidence of the trails within the APE diminishes their integrity of location, design, setting, feeling, and association. NPS (1995:44) states: "The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance."

One of the four steps in assessing a resource's integrity is determining whether its essential physical features are visible enough to convey its significance (NPS 1995:45). NPS states:

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction (NPS 1995:46).

Based on results of the 2023 cultural resources investigations, most physical features of the trail are no longer extant or visible within the Project's APE, except some trail segments above the elevation of the Project ROW. The loss of numerous resources associated with railroad construction as well as the construction of the railroad itself and the Seward Highway has impacted the integrity of the three connecting trails within the APE. While the historic significance of the Iditarod Trail system has been determined, the lack of physical remains of the connecting trail segments within the APE render these segments incapable of conveying that significance (Keen 2025). **DOT&PF finds that ANC-00279/ SEW-00566 does not retain sufficient integrity within the Project's APE to be considered eligible by itself or as a contributing element to any NRHP historic property (Keen 2025).**

Unevaluated Sites

The following properties are unevaluated for listing in the NRHP with a summary of each property and a description of how the Project will avoid it. These properties are obliterated and no longer present in the APE or would be avoided by project activities.

ANC-00055

Reported by Reger and Antonson (1976: IV-9), this site consists of a single retouched flake found at a depth of 5 to 10 centimeters below surface (cmb) in a small test hole. The site is located on a treeless knob 660 feet southeast of Beluga Point (ANC-00054). Archaeologists assumed the site could not be larger than the top of the rock knob on which it was documented (Reger and Antonson 1976: IV-9). The site does not extend across the Alaska Railroad trackway some 230 feet to the vicinity of the roadway; the intervening space would have been filled with rock removed by blasting during railroad construction in 1916 and highway construction in 1949-1951 (Attachment A, Page 8). **DOT&PF finds that ANC-00055 is horizontally and vertically removed from any proposed Project activity area and no adverse effect could occur to the site.**

ANC-00105 (Outhouse above Beluga Point)

This site was reported to have consisted of a collapsed outhouse east of Beluga Point in 1976 (Reger and Antonson 1977: IV-12; Attachment A, Page 8). A clearing approximately 15 feet east of the outhouse was thought to represent a tent site. When archaeologists returned to the site in 2001, they failed to locate any trace of the site (Reger 2001:15).

In 2023, HDR archaeologists investigated the vicinity of ANC-00105 and were unable to identify any clear remnants of the outhouse or tent site. The location shown in the AHRS database falls within a clearing on a moderately steep slope—a questionable location for a latrine—suggesting the site may be mis-plotted. HDR observed a partial pull-tab beverage can (post-1960); otherwise, archaeologists observed no historical remains within the immediate area (Hosken et al. 2024:84). **DOT&PF finds that ANC-00105 has been obliterated or removed and therefore lacks sufficient integrity for listing on the NRHP.**

ANC-00109 (McHugh Creek Cabin)

Archaeologists first documented the McHugh Creek Cabin in 1976 when investigators described the site as a collapsed log cabin and log platform located within a narrow valley north of Seward Highway MP 111.8, approximately 400 feet west of the McHugh Creek wayside. The 9 feet by 9 foot cabin may have been associated with the Alaska Railroad Telegraph/Telephone Line (ARTTL; Reger and Antonson 1977: IV-11). When HDR visited the site in 2023, archaeologists found no evidence of the site at the location plotted in the AHRS database (Attachment A, Page 7). The current AHRS site point falls on a rocky bench east of the McHugh Creek wayside and does not closely correspond to the “narrow valley” described by Reger and Antonson (1977: IV-11). The only historical feature visible within this vicinity was an ARTTL pole stump observed approximately 50 feet south of the ANC-00109 site point. HDR noted two guywire anchors nearby, one approximately 40 feet south of the pole stump and the other approximately 30 feet east. Archaeologists also noted that this area had been burned during the 2015 McHugh Creek Fire (Hosken et al. 2024:90). Subsurface testing at the plotted location of the cabin revealed 40 fragments of vessel glass, which appear to be from a single, amber-colored, beverage bottle. Markings from the glass indicate a date range from 1941 to 1969 for the vessel (Hosken et al. 2024:90–91). **DOT&PF finds ANC-00109 has been obliterated or removed and therefore lacks integrity sufficient for listing on the NRHP.**

ANC-00110 (Sheep Creek Cabins)

In 1976, archaeologists documented the remains of two 12 by 13-foot log cabins and a garbage dump. The site was located approximately 100 yards upstream from the mouth of Sheep Creek and approximately 0.25 mile downstream from ANC-00101. Archaeologists assumed the site was associated with the telegraph station (ANC-00101; Reger and Antonson 1977: IV-10–11). The site has not been field verified since the 1976 field survey, and HDR was unable to access the site during the 2023 field season (Hosken et al. 2024:33). Google Earth Imagery from July 2024 does not show indications of log cabin remains at the site’s plotted location (Attachment A, Page 6). **DOT&PF finds that because ANC-00110 has been obliterated or removed, it therefore lacks integrity for listing on the NRHP.**

ANC-00816 (Isle Site)

This site is located on a bedrock knob approximately 60 meters south of the edge of the pavement at Seward Highway MP 112. The knob is across from the McHugh Creek parking area, isolated by water during high tide (OHA 2024) and across the Alaska Railroad trackway from the highway. In 1995, archaeologists noted several ground slate artifacts and a single diagnostic artifact. Subsurface testing revealed several unworked slate fragments but no additional artifacts. In 2001, archaeologists noted a small, chipped biface tip on the surface. No artifacts have been found outside the boundaries of the rock knob (Reger 2001:18-19).

HDR archaeologists were unable to conduct a site visit during the 2023 fieldwork due to high tides (Hosken et al. 2024:88–89). The plotted AHRS location, Reger’s (2001) description of the site, and the 2023 field reconnaissance all match and indicate the site is plotted correctly (Attachment A, Pages 6–7). The site is located offshore, away from Project activities on a rocky outcrop within Turnagain Arm. Project activities would not occur offshore at this location. **DOT&PF finds that because ANC-00816 is removed horizontally and vertically from the proposed project activity area no adverse effect from the project could occur.**

SEW-00101 (Indian Roadhouse Site)

This is the site of a historic roadhouse on the western side of Indian Creek that operated during and possibly before construction of the Alaska Railroad and may be associated with the INHT (OHA 2024).

In 1976, Reger and Antonson (1977: IV-15) identified three foundations and one standing cabin along the western bank of Indian Creek on the northern side of the Seward Highway. CRC archaeologists investigated the site vicinity in 2006 and observed a clearing possibly corresponding to the former structure's location (Yarborough et al. 2009:22–23). The only artifacts noted were a 55-gallon drum and a barrel stove found near the western side of Indian Creek. An enclosed garden and chicken coop found farther west (closer to the current AHRS site point; Attachment A, Page 13) were assumed to be recent (Yarborough et al. 2009:33). Some of these structures are captured in survey records for USS 3215.

In 2023, HDR archaeologists examined the site vicinity from the Seward Highway ROW. No structural remains associated with the roadhouse were clearly visible, although the dilapidated chicken coop noted by CRC (Yarborough et al. 2009) remained present. While HDR was inspecting the area, the property owner approached the archaeologists to inquire about the survey. When asked whether she had ever encountered historical remains on her land, the property owner recalled that previous archaeological investigations roughly 10 to 15 years prior (presumably the 2006 CRC survey) had found artifacts within the area east of the AHRS site point, closer to Indian Creek (M. Szweda, personal communication 2023). She estimated that the roadhouse was located near where her home currently sits. The landowner also stated that a pond previously covered the area north of the Seward Highway and west of Old Johns Road. Reportedly, the pond flooded according to the tides in Turnagain Arm until it was dug out during highway construction activities (Hosken et al. 2024:62). **DOT&PF finds that there is no effect to SEW-00101 as the structures have been obliterated and therefore lack integrity for listing on the NRHP.**

SEW-00126 (Indian Railroad Section)

The Alaska Railroad established this section at Indian in 1918. The AHRS site point is located between the Seward Highway and the Alaska Railroad directly west of Indian Creek; however, the 1930 United States Survey No. 1868 of the Frank E. Lee homestead claim indicates SEW-00126 was approximately 0.75 mile west, near what is now the southern end of Indian Valley Road (Yarborough et al. 2009:33). By the 1970s, no evidence of the section house remained (Brown 1975; Reger and Antonson 1977: IV-14).

In 1984, the railroad constructed a new section facility approximately 0.1 mile northeast of the original section, consisting of a gas car shed and a smaller outbuilding (Yarborough et al. 2009:15). Both of the 1984 structures had been removed by the time CRC archaeologists surveyed the area in 2006 (Yarborough et al. 2009:23). CRC found remnants of both structures as well as a “relatively recent” trash dump eroding from the beach face east of the Indian Section Facility (Yarborough et al. 2009:23). By georeferencing historical maps, CRC estimated that the modern Seward Highway likely sits on top of SEW-00126 (Yarborough et al. 2009:33).

HDR examined the plotted (AHRS) location of SEW-00126 on the western side of Indian Creek (Attachment A, Page 13). The SEW-00126 site point falls within a cleared area that was recently subject to heavy ground disturbance during replacement of the highway bridge over Indian Creek. HDR observed no historical remains at the surface (Hosken et al. 2024:64–65). **DOT&PF finds the Project can have no effect to SEW-00126 as the structure has been obliterated and therefore lacks integrity for listing on the NRHP.**

SEW-00132 (Indian Sawmill Site)

This site is the former location of the Indian Sawmill, located on the eastern side of Indian Creek at what is now Seward Highway MP 102.9 (Attachment A, Page 13). The AEC opened a logging operation and sawmill on the same site in 1918, which was subsequently destroyed by fire (OHA 2024). The AHRS site record indicates no remnants of either mill exist, although pilings from a bridge that once connected the mill and railroad were reportedly seen in Indian Creek during the mid-1950s (OHA 2024).

HDR archaeologists found no evidence of SEW-00132 during the 2023 survey. Much of the area east of Indian Creek has been paved, including parking lots for local business, bicycle paths, and the Seward Highway (Hosken et al. 2024:62). **DOT&PF finds the Project would have no effect to SEW-00132 as the site has been obliterated and thus lacks integrity for listing on the NRHP.**

SEW-01219 (Prospect Pits)

In 2006, CRC archaeologists identified SEW-01219, a cluster of two possible prospect pits located 30 meters south of the power transmission line (Yarborough et al. 2009:17). One pit measured 4.9 feet wide by 7.9 feet long by 1 foot deep. The second pit was 39.4 feet northwest of the first and measured 5.2 by 2.3 feet and 0.7 foot deep. Based on the amount of vegetation regrowth within the pits, CRC estimated that the features could date as early as the 1930s.

Sources vary considerably regarding the location of SEW-01219. CRC originally described the site as being approximately 0.75 mile northeast of Indian Creek's mouth, which would place SEW-01219 well outside the APE (Yarborough et al. 2009:17). However, CRC also stated that the pits are south of the transmission line, which is 0.3 mile northeast of Indian Creek (Yarborough et al. 2009:17). In contrast, the AHRS site record indicates SEW-01219 is located along the transmission line near Bird Creek (OHA 2024). This description is more consistent with the figures provided in CRC's report, which show the site adjacent to the transmission line (SEW-01075), approximately 0.3 mile northwest of the Bird Creek's mouth, outside the current APE (Yarborough et al. 2009:6). The AHRS web mapper application shows yet another site location, which is within the APE, south of Seward Highway MP 101.9.

In 2023, HDR examined the site location plotted in the AHRS web mapper (south of MP 101.9) and failed to locate any evidence of the prospect pits (Attachment A, Page 14). The site point falls on the northern side of the embankment above the Alaska Railroad, an area heavily overgrown with alder shrubs and devil's club. Based on lack of physical remains and the overall confusion surrounding the site's location, it is likely that SEW-01219 is mapped incorrectly in the AHRS database and is not within the APE. **DOT&PF finds that there can be no effect to SEW-01219 as it is not located within the Project APE.**

SEW-01500 (Bird Creek Knoll)

SEW-01500 consists of an isolated whetstone reported southwest of Seward Highway MP 102. The site is located on the southeastern shoulder of a knoll, portions of which have been disturbed by highway construction or maintenance activities (OHA 2024). In 2013, investigators suggested heavy machinery had removed the upper 1 to 2 centimeters of soil and exposed the whetstone (OHA 2024).

HDR archaeologists examined the knoll in 2023 and were unable to locate the whetstone or any other surface artifacts. HDR excavated one test pit on the knoll, approximately 5 meters west of the site point given in the AHRS database (Attachment A, Page 14). Sediments consisted of layers of silt and gravel, including the disturbed overburden. Excavation was terminated at 36 cmbs after encountering a dense layer of glacial till, which archaeologists assumed to represent the base of cultural deposits. HDR did not observe cultural materials (Hosken et al. 2024:56). **DOT&PF finds SEW-01500 will not be affected by the Project because it has been obliterated and therefore lacks integrity sufficient for listing on the NRHP.**

Consultation Efforts

For purposes of the NHPA, DOT&PF, acting as FHWA under the 23 U.S.C. 327 MOU, initiated consultation with potential consulting parties on December 22, 2023, to identify historic properties that may be affected by the Project. DOT&PF invited the following entities to participate in the Section 106 process as Consulting Parties via a letter sent in December 2023:

- SHPO
- Bureau of Land Management (BLM)
- Chickaloon Village Traditional Council (CVTC)
- Eklutna Native Village
- Eklutna, Inc.
- Knik Tribe
- Knikatnu, Inc.
- U.S. Fish and Wildlife Service (USFWS)
- U.S. Forest Service (USFS)
- Municipality of Anchorage (MOA)
- Alaska Association of Historic Preservation (AAHP)
- Cook Inlet Region, Inc. (CIRI)
- Iditarod Historic Trail Alliance
- Kenai Mountains-Turnagain Arm National Heritage Area (KMTG)
- Chickaloon-Moose Creek Native Association

As the Section 106 process got underway, these additional organizations were invited to be Consulting Parties:

- ARRC
- Kenai Mountain Turnagain Group
- Kenaitze Indian Tribe (KIT)
- Prince William Sound Economic Development District (PWSEDD)
- Tyonek Native Corporation

Table 5 highlights the meetings that were held specific to the Section 106 process.

Table 5. Section 106 meetings.

Date	Participants	Location	Purpose
10/12/2023	DOT&PF, SHPO, HDR	HDR offices and online	One-on-one Project kick-off meeting with SHPO
5/29/2024	DOT&PF, SHPO, BLM, HDR	HDR offices and online	Project overview, coordination on APE, 2023 cultural resources survey results
6/10/2024	DOT&PF, SHPO, BLM, HDR	HDR offices and online	Project overview, coordination on APE, cultural resources survey results, discussion of potential effects to historic properties
6/10/2024	DOT&PF, KIT, HDR (Invited but did not attend: Tyonek, KMTG, Eklutna, CVTC, Knik)	HDR offices and online	Coordination on APE, cultural resources survey results, discussion of potential effects to historic properties
6/25/2024	DOT&PF, Eklutna Native Village, KIT, HDR	HDR offices and online	Project overview, coordination on APE, discussion of potential effects to historic properties

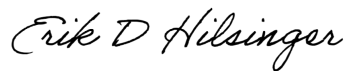
7/29/2024	DOT&PF, SHPO, BLM, Chugach Alaska Corporation, KMTG, KIT, Knik Tribe, HDR (Invited but did not attend: CVTC, Eklutna, PWSEDD, Tyonek Native Corporation)	HDR offices and online	Project overview, coordination on APE, discussion of potential effects to historic properties
12/03/2024	DOT&PF, SHPO, KIT, BLM, MOA, CVTC, ARRC, USFWS, USFS, AAHP, Iditarod Historic Trail Alliance, HDR (Invited but did not attend: KMTG, CIRI, Eklutna Native Village, Knikatu, Inc.)	HDR offices and online	Project overview, coordination on APE, discussion of Project not having effects to historic properties within the Project corridor

Section 4(f) of the DOT Act

It is DOT&PF's intent to make a Section 4(f) *de minimis* impact finding for SEW-00143 (Indian Valley Trail) premised on your written concurrence that the project will not adversely affect or impair the features and attributes that contribute to the NRHP eligibility of the Indian Valley Trail (SEW-00143).

Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0534 or by email at erik.hilsinger@alaska.gov.

Sincerely,



Erik Hilsinger MA
Cultural Resources Specialist
DOT&PF Central Region PD&E

Enclosures

Attachment A – Map Book

Attachment B – *Additional Research Report: Iditarod Connecting Trails (SEW-00257, SEW-00143, SEW-00566/ANC-00279)*

Electronic cc w/ enclosures:

Sean Baski, DOT&PF Central Region, Chief of Highway Design, Project Coach

Brian Elliott DOT&PF Central Region, Regional Environmental Manager

Matt Dietrick, DOT&PF Statewide NEPA Manager

Holly McKinney, DOT&PF Statewide Cultural Resources Manager

Taylor Horne, HDR Engineering Inc., Project Manager

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Figures



Figure 1. View of Beluga Point over railroad tracks, looking southeast, 1939–1959.

Source: <https://vilda.alaska.edu/digital/collection/cdmg2/id/8196/rec/4>



Figure 2. Steep rock face opposite the Beluga Point wayside, view northwest.



Figure 3. Indian and the trail in 1951, 1954 and 1968. <https://ngmdb.usgs.gov/topoview/viewer/#13/61.0003/-149.5279>

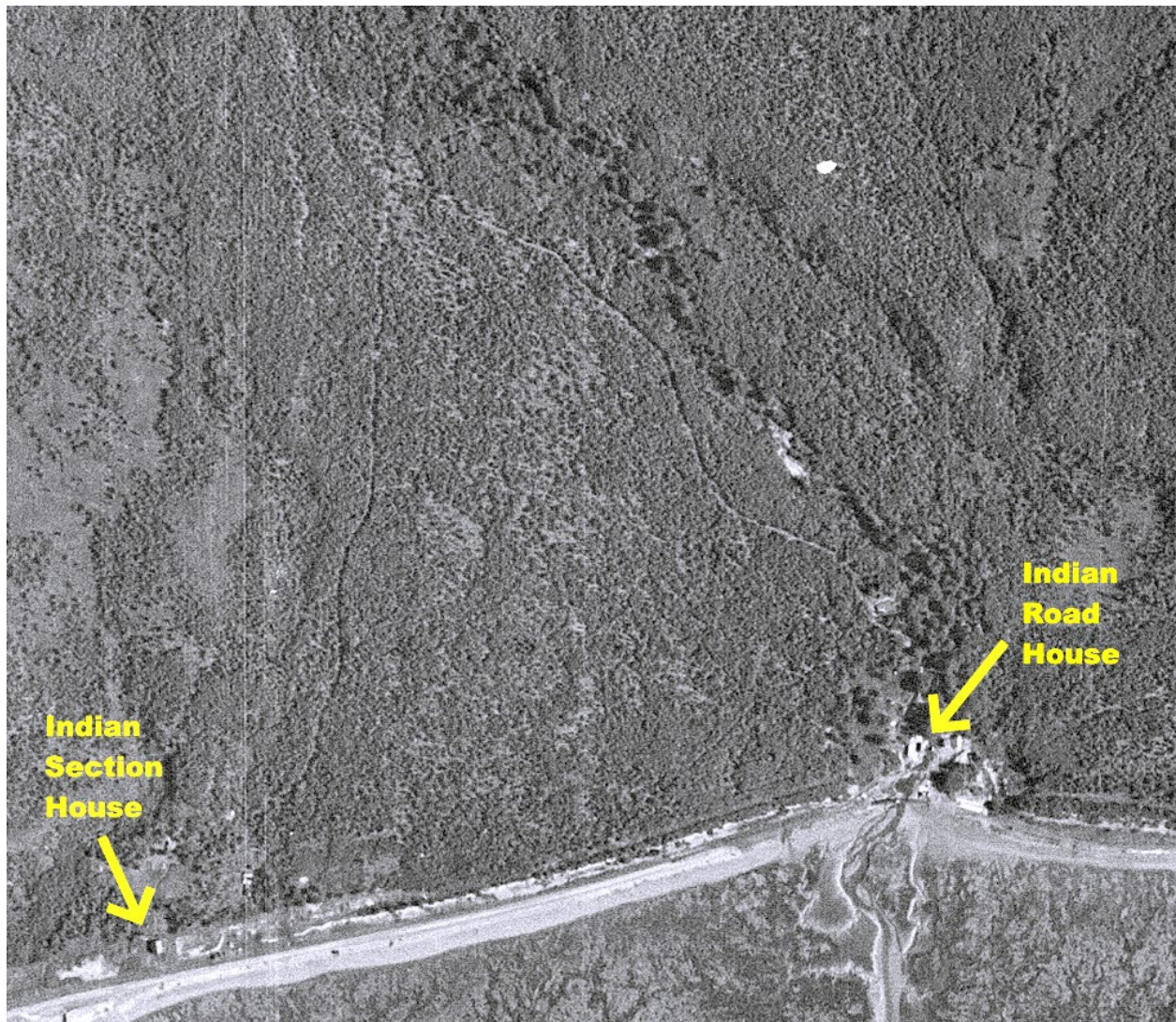


Figure 4. August 7, 1950, air photo extract showing Indian vicinity trails. USGS ARBM03710190019



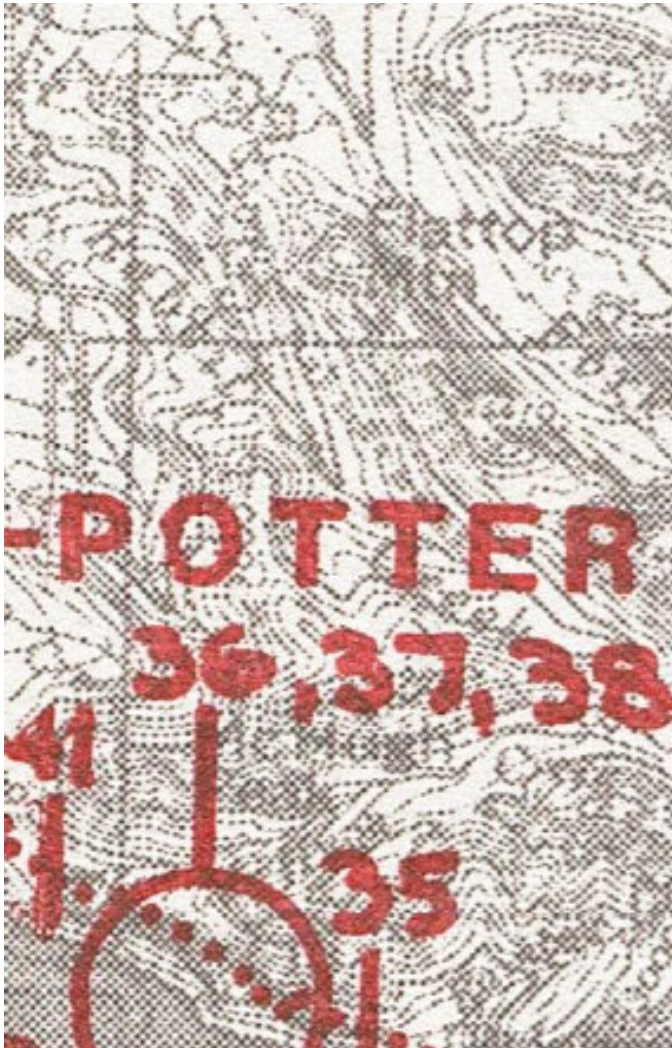
Figure 5. ANC-00075, Potter Section House, view north. Source: Hosken et al. 2024:109



Figure 6. SEW-00412 (Indian Valley Mine), view north, log cabin at center and the assay office's roof at left.



Figure 7. SEW-01379 (Diamond Jim's), view east.



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

Additional Research Report: Iditarod Connecting Trails (SEW-00257, SEW-00143, SEW-00566/ANC-00279)

February 2025

Prepared for:

Alaska Department of Transportation and Public Facilities

Prepared by:

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

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**This report contains restricted information
and is not included in this Environmental
Assessment. It may be made available upon
request.**

To reduce the length of this document, only the Findings of Effect letter to the Alaska State Historic Preservation Office(r) has been included herein. The same letter was also sent on March 26, 2025, to the following entities:

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Alaska Association for Historic Preservation, Inc.
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Anchorage, AK 99501

Jenny Blanchard, Archaeologist
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THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities

OFFICE OF THE COMMISSIONER

P.O. Box 112500
3132 Channel Drive
Juneau, AK 99811-2500
Main: 907-465-3900
TTY: 711 or 1-800-770-8973
dot.alaska.gov

December 22, 2023

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

Re: Safer Seward Highway
Z566310000/0A31034
Consultation Initiation

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has assumed the responsibilities of the Federal Highway Administration (FHWA) under 23 U.S. Code (U.S.C.) 327, and is proposing to construct improvements along the Seward Highway between mileposts (MP) 98.5 and 118, Bird Flats and Rabbit Creek. The purpose of the proposed Safer Seward Highway Project (project) is to improve public safety, with the end goal of decommissioning the Highway Safety Corridor between Anchorage and Girdwood.

The existing Seward Highway within the project corridor is an undivided Interstate Highway, with a posted 55-mile-per-hour (mph) speed limit, that consists of two 12-foot-wide travel lanes, 8-foot-wide shoulders with rumble strips, and limited passing or acceleration/deceleration lanes. The highway is constrained between the steep slopes of the Chugach Mountains and the waters of Turnagain Arm. The Seward Highway is a National/State Scenic Byway and All-American Road. It provides the only road access from Anchorage to communities to the south (e.g., Girdwood, Seward, Kenai) and the Alaska Marine Highway System, which stops at the ports of Whittier, Seward, and Homer. The Seward Highway supports commercial, recreational, and residential traffic.

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 13, 2023, and executed by FHWA and DOT&PF.

For purposes of the National Historic Preservation Act, DOT&PF, acting as a federal agency, is initiating this consultation with you to assist us in identifying historic properties that may be affected by the proposed project. Consultation is being conducted in accordance with the 2017 *First Amended*

“Keep Alaska Moving through service and infrastructure.”

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated November 3, 2017 and executed by FHWA and DOT&PF.

Programmatic Agreement...Regarding Implementation of Section 106 of the National Historic Preservation Act for the Federal-Aid Highway Program in Alaska.

Project Location and Ownership

The project is located within U.S. Geological Survey (USGS) map quadrangles Anchorage A-8 and Seward D-7 and D-8, Seward Meridian, within Sections 5–6, 8–10, 14–15, and 23, Township 10 North (N), Range 1 West (W); Sections 1–4, Township 10N, Range 2W; Sections 30–34, Township 11N, Range 2W; Sections 4, 9–10, 15, 22–23, and 25–26, Township 11N, Range 3W; and Sections 32–33, Township 12N, Range 3W. The beginning of the project is located at Latitude 60.9511, Longitude -149.4027 (MP 98.5 at Bird Flats); and the end of the project is located at Latitude 61.0871, Longitude -149.8344 (MP 118, north of Potter Marsh, at the intersection/overpass to Rabbit Creek Road).

The State of Alaska, with DOT&PF and the Alaska Department of Natural Resources (ADNR) providing management, and the Alaska Railroad Corporation (ARRC) own the majority of land within the project corridor. The existing transportation corridor generally consists of a 300-foot-wide Public Land Order (PLO) highway right-of-way (ROW) and a 200-foot-wide ARRC ROW that are each centered on their respective alignments and partially overlap for most of the corridor. The road ROW consists of PLO easements and any additional ROW the state purchased under past projects to allow for highway construction, operation, and maintenance.¹

Project Description

DOT&PF is evaluating improvements to mobility and safety for motorized and non-motorized users of the Seward Highway between MPs 98.5 and 118. These improvements are anticipated to include both operational and safety improvements. Improvements may include managing access, incorporating turning and/or acceleration lanes, improving sight distances around curves, or adding travel lanes. Attachment A provides a series of maps showing the project study area.

This proposed project intends to address three needs:

1. **Reduce High Crash Rate and Severity.** In 2006, this segment of the Seward Highway was designated as the state’s first Highway Safety Corridor in recognition of the fatal crash rate at that time. Despite additional enforcement presence, community education and improved signage, segments still have a higher-than-average crash rate and severity. Improvements that reduce the crash rate must be completed to remove the Safety Corridor designation. This need includes improving safety for non-motorized users in the corridor.
2. **Update Substandard Design.** The existing highway does not meet current design standards for its function and traffic levels. The existing highway contains curves, shoulders, guardrail, and clear zones that do not meet current design standards. Both highway and non-motorized facility improvements need to be rebuilt to current state and national design standards.
3. **Increase Mobility and Reliability.** This highway corridor serves both regional users, who travel between Anchorage and the Kenai Peninsula, and local users, who live and work in the communities along this segment of the Seward Highway. The highway becomes congested resulting in reduced travel speeds, long platoons (lines) of vehicles, and a degraded level of service. Unexpected delays affect all travelers, reducing the reliability of travel during periods of congestion and roadway closures. Non-motorized users lack reliable, safe, continuous facilities in this corridor. Improvements need to increase travel mode choices and the reliability and accessibility of facilities.

¹ Bennett, John F. *Highway Rights-of-Way in Alaska*. 2013. Accessed at <https://www.rmconsult.com/wp-content/uploads/2022/11/2013-Highways.pdf>.

The current effort to improve safety along the Seward Highway between Girdwood and Anchorage began in the early 2000s when a Categorical Exclusion was approved for the Seward Highway Safety Improvements, Indian to Potter Marsh, MP 105–115 project. The smaller Seward Highway MP 105 to 107, Windy Corner project, commenced in 2013. After reviewing public comments on the draft Windy Corner Environmental Assessment (EA), DOT&PF extended the project limits 2.5 miles northward, to between Windy Corner and Rainbow Point. Following 2021 scoping for the Seward Highway MP 105–109.5, Windy Corner to Rainbow Point project, DOT&PF expanded the project corridor to its current extent and renamed the project: Seward Highway Reconstruction MP 98.5 to 118, Bird Flats to Rabbit Creek. The current project builds upon the prior work efforts and stakeholder feedback received on the draft Windy Corner EA and Seward Highway MP 105–109.5, Windy Corner to Rainbow Point scoping.

Alternative development and analysis for the current project will be conducted based on stakeholder input, which is ongoing.

Project Study Area

The proposed project extends along the Seward Highway between MP 98.5 (Bird Flats) and ends at MP 118 (north of Potter Marsh and the intersection/overpass to Rabbit Creek Road). While the project's alternatives have not yet been developed, a preliminary Area of Potential Effects (APE) has been developed that is offset from the existing highway centerline by approximately 550 feet at its narrowest and approximately 1,900 feet at its widest (see Attachment A Map Book) to encompass proposed future alternatives. An additional offset of 500 feet beyond each of the proposed project termini allows for transitions from the project segment to the existing roadway and the placement of guardrail, signs, and/or other roadside hardware that may be required. The design will need to provide rock catchment that meets current standards, and the preliminary APE has been developed to account for the possibility of rock cuts that are unknown at this time. The preliminary APE also allows for the alignment to be shifted either inland or toward the water as needed. The APE will be defined after comments are received from your agency and other consulting parties.

Identification Efforts

The proposed project is located on Dena'ina land. The information for traditional placenames within the preliminary APE comes from *The Web Atlas of Alaska Dene Place Names*.² Dena'ina traditional territory roughly covers the area surrounding Cook Inlet (*Tikahtnu*). Several Dena'ina placenames are located within the preliminary APE (see Attachment A Map Book; Table 1). These placenames are associated with the Tutl'uht'ana Band of the Dené of Upper Cook Inlet Dena'ina, Dené-Eyak-Lingit language family.

There are 56 documented Alaska Heritage Resources Survey (AHRS) sites within the preliminary APE³ (Table 2). Fifty of the AHRS sites are historic in age. The historic-era sites include cabins, trails, and roads associated with the Alaska Railroad, the Iditarod National Historic Trail (INHT) system, mining, and the Cold War. The six prehistoric sites are lithic scatters.

Of the AHRS sites documented within the preliminary APE, 24 have been determined not eligible for listing in the National Register of Historic Places (NRHP), 3 are listed in the NRHP, 7 have been determined eligible for listing in the NRHP, 19 have not been evaluated, and 3 have "other" status (see Table 2 for additional information).

² Smith, Gerard, and James Kari. 2022. *The Web Atlas of Alaska Dene Place Names*. ArcGIS Storymap, published online November 1, 2022. Accessed May 2023.

³ Office of History and Archaeology (OHA). 2023. Alaska Heritage Resources Survey [online database]. Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage, Alaska. Accessed April 25, 2023.

One Revised Statute 2477 Trail⁴ (RST) was identified within the preliminary APE⁵ (see Figure 6 in Attachment A Map Book). RST 111, Indian Pass Trail, crosses the project near MP 103. The trail follows the same trajectory as trails recorded in the AHRS: SEW-00143 (Indian Valley Trail) and SEW-00257 (Girdwood-Ship Creek Connecting Trail).

The project area has been subject to numerous cultural resource investigations, beginning in the 1970s. Most of the archaeological investigations along the Seward Highway within the project area have been conducted on behalf of highway improvement or other State of Alaska-sponsored projects. Table 3 summarizes the cultural resources investigations that have occurred within the project's preliminary APE. These surveys are also shown in the Attachment A Map Book.

Most recently, the project sponsored a pedestrian cultural resources survey, conducted by HDR Engineering, Inc. during the 2023 field season. This survey focused on surveying areas that had not been previously surveyed and verifying previously documented AHRS sites to confirm location accuracy and site condition. A reporting of the results of that survey are in progress.

Consulting Parties

The following consulting parties are being contacted for the project:

- Bureau of Land Management
- Cook Inlet Region, Inc.
- Eklutna, Inc.
- Eklutna Native Village
- Knik Tribal Council
- Knikatnu, Inc.
- Municipality of Anchorage
- State Historic Preservation Office
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- Chickaloon Village Tribal Council
- Chickaloon-Moose Creek Native Association
- Kenai Mountains-Turnagain Arm National Heritage Area
- Iditarod Historic Trail Alliance
- Alaska Association for Historic Preservation

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 30 days of your receipt of this correspondence.

⁴ Revised Statute 2477 was originally enacted in Section 8 of the Mining Act of 1866 as a federal law authorizing the construction of roads across federal public lands. In 1976, it was repealed to enact the Federal Land Policy and Management Act (FLPMA). FLPMA preserved all Revised Statute 2477 ROW corridors for public use that existed 10 years prior to its passing, and ensured that the title would be transferred through sale and perpetually be honored.

⁵ Alaska Department of Natural Resources (ADNR). 2010. Revised Statute 2477 Project, RSTs by USGS Quadrangle: Tyonek. Accessed at http://dnr.alaska.gov/mlw/trails/rs2477/rst_srch.cfm in May 2023.

Sincerely,



Erik Hilsinger
Cultural Resources Specialist,
DOT&PF Central Region

Enclosures

Table 1 – Dena'ina traditional placenames

Table 2 – AHRs sites within the preliminary APE

Table 3 – Cultural resource surveys within the preliminary APE

Attachment A – Map Book

cc (electronic with enclosures):

Sean Baski, DOT&PF Central Region, Chief of Highway Design, Project Coach

Brian Elliott DOT&PF Central Region, Regional Environmental Manager

Matt Dietrick, DOT&PF Statewide NEPA Manager

Molly Proue, Acting DOT&PF Statewide Cultural Resources Manager

Table 1. Dena'ina traditional placenames

Name	Feature Type	Language	Literal Meaning	USGS Name
<i>Esbaytnu</i>	Stream	Dena'ina	goat stream	Bird Creek
<i>Nuti Edileni</i>	Stream	Dena'ina	that which flows into salt water	Indian Creek
<i>Q'isqa Betnu</i>	Stream	Dena'ina	banjo snowshoe stream mountain	McHugh Creek
<i>Hkaditali Betnu</i>	Stream	Dena'ina	drift lumber stream	Potter Creek
<i>Hkaditali</i>	Landform	Dena'ina	drift lumber	Potter Marsh
<i>Ggeh Betnu</i>	Stream	Dena'ina	rabbit stream	Rabbit Creek

Source: Smith, Gerard, and James Kari. 2022. *The Web Atlas of Alaska Dene Place Names*. ArcGIS Storymap, published online November 1, 2022. Accessed May 2023.

Table 2. AHRS sites within the preliminary APE^a

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
ANC-00050	Mrs. Johnson's Roadhouse	Historic	The site of an early twentieth-century roadhouse or homestead. Remains consist of two rectangular pits. One pit, a possible cellar, measures 13.8 feet by 8.2 feet by 3.9 feet deep. The other pit measures approximately 29.9 feet by 26.9 feet and may represent a building foundation. No artifacts were found in either pit. An overgrown roadbed is located nearby.	Not eligible (2002)
ANC-00054	Beluga Point	Prehistoric	A deeply stratified prehistoric site yielding lithic, organic, and other remains. Cultural materials reflect use by three separate cultures beginning circa 6500 BP. The oldest, Component I, contains core and blade material related to Denali complex assemblages. Component II (3000–2000 BP) consists of chipped stone points, lanceolate points, rounded base points, and burins. Component III materials are associated with the Kachemak culture and date to 900 BP.	Listed on NRHP (1978, D)
ANC-00075	Potter Section House	Historic	A 1.5-story, wood-frame structure built in 1929 and used as a residence for the railroad section foreman, cook, and crew into the 1970s. The first floor originally included a dining room, kitchen, living room, washroom, and two bedrooms. The upstairs originally served as a passenger waiting room and later as bunk space for railroad maintenance personnel.	Listed on NRHP (1985, A)
ANC-00078	ANC-00078	Prehistoric	A prehistoric site containing bone fragments, chert and chalcedony flakes, two biface fragments, and a small chalcedony side blade. Investigations have also yielded hearth remains, fire-cracked rock, and a charcoal sample. Artifact forms suggest association with the Arctic Small Tool tradition.	Eligible (2003, D)
ANC-00103	Beluga Point Cabin Site	Historic	The remnants of a log cabin of unknown size on the hillside above Beluga Point. A built-up path was noted northwest of the cabin. Possibly associated with Alaska Railroad construction or the INHT.	Not evaluated
ANC-00104	Cabin Foundations	Historic	Six dirt foundations overlooking the Seward Highway and varying in size from 18 feet by 18 feet to 2 feet by 3 feet. A few intact logs were noted in 1976, and one foundation was covered with heavy plastic. Railroad ties were found scattered around the site. Possibly associated with Alaska Railroad construction or the INHT.	Not evaluated
ANC-00105	Outhouse Above Beluga Point	Historic	The collapsed remains of a milled lumber outhouse. A clearing approximately 15 feet east of the outhouse may represent a former tent site. Possibly associated with Alaska Railroad construction or the INHT.	Not evaluated
ANC-00106	Beluga Point Cabin Site	Historic	Two dirt foundations surrounded by a network of indistinct paths located adjacent to a small creek. One foundation is 15 feet by 15 feet and had one log still in place. Dimensions of the other foundation were not recorded. Possibly associated with Alaska Railroad construction or the INHT.	Not evaluated
ANC-00109	McHugh Creek Cabin	Historic	A collapsed log cabin measuring approximately 9 feet by 9 feet. Remains of a possible log platform were noted approximately 25 feet south of the cabin. Possibly associated with Alaska Railroad Telegraph Line construction or the INHT.	Not evaluated
ANC-00110	Sheep Creek Cabins	Historic	The remains of two log cabins each measuring approximately 12 feet by 13 feet. A can dump was noted adjacent to one cabin. Possibly associated with a nearby telegraph station (ANC-00101) or the INHT.	Not evaluated

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
ANC-00113	Rainbow Camp	Historic	A former Alaska Railroad construction camp built in 1910. The camp added a dock and supply warehouse in 1916 and 1917, and became headquarters for the railroad's Turnagain District in 1918. A section house, shed, bunkhouse, liquor store, and residences were present circa 1929. The site has since been bisected by a gravel road, and at least one structure was moved in the 1950s. The site is also associated with the INHT.	Not evaluated
ANC-00124	McHugh Wasteflake Site	Prehistoric	A surface scatter of 29 chert flakes, 1 chalcedony flake, 1 flake of an unidentified material, and 1 shell button. Scatter covers an area of approximately 32.8 square feet. No diagnostic artifacts nor charcoal were recovered.	Not eligible (2003)
ANC-00279	Potter Connecting Trail	Historic	Part of the INHT system; see also SEW-00566. This trail runs from Indian Creek at the Indian Valley Trail (SEW-00143) to Potter Creek. The trail includes the historic Turnagain Arm Trail (ANC-00102) from McHugh Creek to Potter.	Not evaluated
ANC-00816	Isle Site	Prehistoric	A concentration of ground slate artifacts, including unworked slate fragments, a chipped biface tip, and a partial slate lance blade resembling those from Ocean Bay II sites on Kodiak Island.	Not evaluated
ANC-01962	Moen Homestead Trail	Historic	A 1-mile-long trail built in 1951 between the Seward Highway at the Potter Section House and the Moen Homestead (ANC-01963). Unmaintained; originally approximately 12 feet wide but now approximately 6 feet wide. A 2018 site visit indicated a 0.3-mile portion has been disturbed by modern development.	Not eligible (2018)
ANC-04057	Turnagain District of the Alaska Railroad	Historic	The westernmost portion of the historic Turnagain District of the Alaska Railroad, located between Rainbow and Potter (Alaska Railroad MPs 93–100.6); see also SEW-01613.	Eligible (2015, A)
ANC-04069	Seward Highway	Historic	An approximately 125-mile-long highway between Seward and Anchorage, and the only vehicular road linking the Kenai Peninsula with the rest of the Alaska highway system; see also SEW-01557. The portion of the Seward Highway designated as Interstate Highway (MPs 37–124) is exempt from Section 106 review under the 2005 Interstate Exemption.	Not evaluated
ANC-04349	McHugh Creek Road Weather Information System Tower	Historic	A Road Weather Information System microwave tower built in 1959 and adjacent concrete block structure. Associated with Cold War-era communications systems in Alaska; also, a contributing element to the Turnagain Arm District of the Alaska Railroad (ANC-04057).	Eligible (2017, A)
SEW-00029	Alaska Railroad	Historic	The site number for the Alaska Railroad between Seward and Potter. The railroad was constructed by the U.S. government between 1915 and 1923, from Seward to Fairbanks, with branches from Matanuska to Palmer and Fairbanks to Eielson.	Closed for other reason – needs re-evaluation (NRXCL)
SEW-00101	Indian Roadhouse Site	Historic	Three foundations and one standing cabin associated with an early twentieth-century roadhouse on Indian Creek. Site is associated with the INHT.	Not evaluated

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
SEW-00103	The Bird House	Historic	An L-shaped log building consisting of three joined cabins. The original structure was constructed circa 1903; subsequent additions date to the Alaska Railroad construction era (1916–1917) and the 1960s, when the building was converted for use as a bar. The Bird House Bar burned down in 1995.	Found not eligible by Alaska Historical Commission (A)
SEW-00113	Falls Creek Cabin and Camp	Historic	The former location of a 15-foot by 16-foot log cabin associated with Falls Creek, the district engineer’s headquarters during construction of the Alaska Railroad (1917–1918). As of 2001, visible remains of the Falls Creek camp consisted of 15 gravel pads and 1 tin can.	Not eligible (2003)
SEW-00126	Indian Railroad Section	Historic	An Alaska Railroad section established at Indian in 1918. An Alaska Engineering Commission plat indicates multiple structures present in 1921, including a section house, telephone booth, car house, coal house, meat house, woodshed, and water closet. A new section house was built in the late 1920s. A 2010 survey found no remains of the site, which has likely been paved over by the existing highway. Site is associated with the INHT.	Not evaluated
SEW-00131	SEW-00131	Prehistoric	A prehistoric site consisting of a surficial to shallow lithic scatter on a rock bluff overlooking the Seward Highway. Artifacts include at least 16 chert flakes and a stemmed projectile point comparable to Riverine Kachemak components along the Kenai River. Site has been disturbed by modern construction.	Not eligible (2003)
SEW-00132	Indian Sawmill Site	Historic	A sawmill operated by the Alaska Engineering Commission in 1918; destroyed by arson later that year. A private sawmill later operated at the site and provided wood to the railroad. Evidence of logging is apparent along Indian Creek, but no remains of either sawmill exist. Remnants of an associated wooden bridge were present into the 1950s.	Not evaluated
SEW-00143	Indian Valley Trail	Historic	A segment of the INHT system, approximately 1 mile long; see also ANC-00281, which is the remainder of the trail to Indian Creek Pass. The Indian Valley Trail was established by at least 1907 and followed Indian Creek north from Turnagain Arm to Indian Pass, then along Ship Creek to the flats at the base of the mountains.	Eligible (1999/2005, A)
SEW-00257	Girdwood-Ship Creek Connecting Trail	Historic	Part of the INHT system; see also ANC-00280. This segment runs along Turnagain Arm from Girdwood to Indian Creek and follows the Indian Valley Trail (SEW-00143/ANC-00281) to Ship Creek. Completion of the trail from Girdwood to Indian Creek in 1908 provided an alternate route to the Crow Pass Trail.	Not evaluated
SEW-00412	Indian Valley Mine	Historic	An early twentieth-century mine and associated features, including an assay building, blacksmith shop, and cabin built circa 1920, as well as a hand-dug ditch and a re-opened mine shaft. Various non-contributing resources are located on site and include a trailer, parking area, and assorted small, recent buildings.	Listed on NHRP (1989, A)
SEW-00566	Potter Connecting Trail	Historic	Part of the INHT system; see also ANC-00279. This trail runs from Indian Creek at the Indian Valley Trail (SEW-00143) to Potter Creek.	Not evaluated

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
SEW-00950	Cabin and Root Cellar Ruins	Historic	The ruins of a cabin and collapsed root cellar located on a bench west of Bird Creek. The cabin foundations measure 10 feet by 18 feet, and the root cellar measures 5 feet by 12 feet. An extensive array of structural debris, cans, glass jars, stovepipe, and other artifacts were identified in the vicinity and suggest occupation from the early 1900s to the 1970s. The site is possibly associated with the Bird Creek Lumber Company Sawmill (SEW-00564).	Not evaluated
SEW-00961	Footing Depressions for a Bridge Abutment	Historic	Ten depressions, cut into bedrock and stair-stepped up the hillside on Bird Creek. Excavated in 1917 as footings for a railroad bridge but later abandoned in favor of a crossing at the mouth of the creek.	Not evaluated
SEW-00996	Historic Tent Foundations and Can Scatter	Historic	A site consisting of two tent foundations and two can scatters, possibly associated with seasonal railroad workers. Each foundation measures approximately 18.8 feet square with berms 3.9 to 5.9 inches high. Tin can types suggest occupation during the 1930s. Other artifacts include a leather boot, a CO ₂ cartridge, and pieces of roofing or flooring.	Eligible (2003, D)
SEW-01044	Whittier-Anchorage Pipeline System	Historic	An historic district associated with the Whittier to Anchorage pipeline system (see also ANC-01301). Includes the DeLong fuel dock in Whittier (SEW-01041), the Whittier Terminal (SEW-01042), buried and above ground pipelines (ANC-01832), the Indian Booster Station (SEW-01043), the Chugach Pressure Reduction Station (ANC-01303), and the Anchorage Terminal (ANC-01302).	Not eligible (2003)
SEW-01075	Power Transmission Line	Historic	A transmission line constructed in 1962 to carry power from the Cooper Lake Power Plant to Anchorage. The line extends 90.4 miles from the Quartz Creek substation to the Anchorage substation and now carries power produced at Cooper Lake, Bradley Lake, and Nikiski.	Not eligible (2005, 2012)
SEW-01219	Prospect Pits	Historic	Two possible prospect pits located south of the transmission line. The first pit measures 4.9 feet by 7.9 feet by 1 foot deep, while the second is 5.2 feet by 2.3 feet by 0.7 foot deep. The degree of revegetation in each pit suggests they could date as early as the 1930s.	Not evaluated
SEW-01275	Anchorage-Whittier Pipeline	Historic	A pipeline associated with the Whittier-Anchorage Pipeline historic district (SEW-01044/ ANC-01832). No description provided for the pipeline itself.	Not eligible (2003)
SEW-01321	Very Large Can Dump	Historic	Historic refuse consisting of a large concentration of glass, ceramic, and steel containers and tires. Investigations in 2019 indicated that construction and other disturbances have buried SEW-01321 since it was identified in 2006.	Not eligible (2019)
SEW-01379	Diamond Jim's Sign	Historic	A neon sign associated with a business begun in Portage in 1948. The associated log structure was constructed in 1956. Both were relocated to Bird following the 1964 earthquake. Note that the 2009 DOE pertains only to the sign and not the associated log structure.	Eligible (2009, A)
SEW-01500	Bird Creek Knoll Site	Prehistoric	An isolated whetstone identified near the top of a knoll between the Seward Highway and Turnagain Arm. The site was previously exposed by a bulldozer, which apparently removed only the first inch of original soil. Intact cultural materials may remain in situ nearby.	Not evaluated

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
SEW-01557	Seward Highway	Historic	An approximately 125-mile-long highway between Seward and Anchorage, and the only vehicular road linking the Kenai Peninsula with the rest of the Alaska highway system; see also ANC-04069. The portion of the Seward Highway designated as Interstate Highway (MPs 37–124) is exempt from Section 106 review under the 2005 Interstate Exemption.	Not eligible (2019): DOE is only for the non-Interstate portion (MP 0–37)
SEW-01559	Concrete Block Cluster	Historic	Five large concrete blocks scattered over a roughly 225-square-foot area. Each block measured 18 inches by 18 inches by 13 inches. Dense moss growing on each block suggests they have been in this location for quite some time.	Not eligible (2015)
SEW-01560	Mobile Home Remains	Historic	A dilapidated 40-foot by 10-foot mobile home. The walls and roof have either collapsed or were deliberately demolished. The foundation, flooring, and entry stairs remain in place. Fiberglass insulation, electrical wiring, switch boxes, and plastic piping are also present.	Not eligible (2015)
SEW-01561	Cluster of Car Parts	Historic	A cluster of car parts, including a fender and door, found adjacent to and south of the power line. The style and color suggest manufacture in the 1950s or 1960s, although it was unclear when these items were discarded at the present location.	Not eligible (2015)
SEW-01562	Indian Ditch	Historic	An earthen ditch, approximately 4 feet wide and 2 feet deep with an unknown length. The ditch starts near the Seward Highway and runs diagonally up the ridge, roughly parallel to the highway. A large spoil pile was noted near the end closest to the highway	Not eligible (2015)
SEW-01563	320 Karalyssa Drive, The Indian House	Historic	A building formerly housing the Indian House Restaurant, constructed in the mid-1960s with subsequent renovations and additions. The building has a concrete foundation and a combination of gabled and shed roofs.	Not eligible (2015)
SEW-01564	27957 Seward Highway, Turnagain House	Historic	A rectangular building formerly housing Pepe’s Turnagain House Restaurant. The eastern half is one story and was constructed pre-1964. It was moved from Portage to its current location after the 1964 earthquake. The western half of the building is two stories. The building also includes two small additions on the northern and southern elevations. Two small sheds are located at the rear of the building.	Not eligible (2015)
SEW-01565	135 Old Johns Road	Historic	This property contains three buildings, including a residence and shed built in 1962, and a second shed of apparently modern construction.	Not eligible (2015)
SEW-01567	29025 Seward Highway	Historic	Tax records for this property list a garage and storage shed built in 1965 and a 1968 residence. A 2015 survey noted a shed and two residences, presumably corresponding to those listed in the tax records. The shed and one residence were relocated from Portage to Indian after the 1964 earthquake.	Pending consultation between SHPO and DOT&PF as of 2015
SEW-01568	29135 Seward Highway, Valley Bible Chalet	Historic	A two-story, A-frame church constructed in 1969. Other buildings on the lot include a recent, one-story, gable-roofed building; 1970s-era cabin; greenhouse; and gable-roofed outbuilding.	Not eligible (2015)

AHRS No.	Site Name	Site Type	Description	NRHP Eligibility (Year, Criteria)
SEW-01569	29383 Seward Highway, Essential One Gas Station	Historic	This property contains a concrete block building currently used as a gas station; a small, concrete block shed built in 1968; and three steel canopies, one of which shelters the fuel pumps. The canopies were likely built after 1995.	Not eligible (2015)
SEW-01570	29433 Seward Highway	Historic	This property contains two one-story, concrete block buildings, formerly used as an office and restaurant (29433 Seward Highway) and a motel (29419 Seward Highway). The office and restaurant were built in 1968, and the motel was completed shortly thereafter.	Not eligible (2015)
SEW-01571	29521 Seward Highway, Cabin on the Bird Garage Parcel	Historic	Tax records for the property list the Bird House Garage (2004), storage shed (2002), cabin (1981), ranch-style log home (1964), detached garage (1962), and another storage shed (1944). The AHRS record states only the log home is old enough to be historic.	Not eligible (2015)
SEW-01572	210 Auriga Lane	Historic	A one-story, wood-framed house built in 1952. The AHRS record indicates the residence has undergone various recent additions and renovations.	Not eligible (2015)
SEW-01579	Can Dump	Historic	A can dump consisting of three buckets; five plates; an enameled basin; and two large pieces of metal, one of which may be part of a woodstove. Site is possibly associated with gold mining at the nearby Indian Valley Mine (SEW-00412) or with power line construction.	Not eligible (2016)
SEW-01613	Turnagain District of the Alaska Railroad (MP 64 to 93)	Historic	Part of the historic Turnagain District of the Alaska Railroad between Portage and Rainbow (Alaska Railroad MPs 64–93); see also ANC-04057. Sections include Portage to Girdwood (MPs 64.2–75.5), Girdwood to Bird Siding (MPs 75.5–82), Bird Siding to Indian (MPs 82–88.7), and Indian to Rainbow (MPs 88.7–93).	Eligible (2016, A)
SEW-01626	Railroad Bridge MP 86.6, Bird Creek	Historic	A 151-foot railroad bridge consisting of one 123-foot pony truss span with concrete piers, and one 14-foot approach span on each end of the bridge. Originally constructed in 1936 as a surplus 80-foot through girder span with three timber trestle approach spans on both ends, which replaced earlier timber trestle bridges built in 1917 and 1918. Later modifications included the addition of a fourth stringer to each chord of the timber approach spans in 1952, resetting the rails in 1981, installation of a new bulkhead in 1985, and replacement of the 1936 through girder span with the pony truss span in 1997.	Assumed NRHP eligible^b

^a AHRS site data obtained January 2023

^b Bundy and Holt 2020

Notes: BP=Before Present; DOE=Determination of Eligibility; No.=Number

Table 3. Cultural resource surveys within the preliminary APE

Project	Author(s)	Year	Type of Survey	Location of Survey
Alaska State Park System	Dixon and Johnson	1973	Pedestrian survey	Waysides within Alaska State Parks
Alaska Parks Project	Smith	1974	Pedestrian survey	Roadhouses along Alaska highways
Alaska Railroad Study	Brown	1975	Archival research	Sites along the ARRC corridor
Potter-Girdwood Archaeological and Historic Site Survey	Reger and Antonson	1976	Pedestrian survey	Within Seward Highway ROW between MP 90–115
Beluga Point	Reger	1985	Site report	ANC-00054, near Seward Highway MP 110.5
Iditarod Trail in the Chugach National Forest	Schweigert	1999	Archival research and survey	SEW-00143, Indian Valley Trail, near Seward Highway MP 103.5
Bird Point	DePew	2000	Pedestrian survey	Bird Point
Seward Highway Bird Point to Potter Marsh Passing Lanes and Pathway Project	Reger	2001	Pedestrian survey	Along Seward Highway corridor between MP 99–115
Bird Creek Improvement Projects	Buzzell	2001	Pedestrian survey	Seward Highway MP 101.5
Sign near MP 102.9	Neely	2007	Historic structure survey	Seward Highway MP 102.9 – Diamond Jim’s Sign
Seward Highway MP 99–105	Yarborough et al.	2009	Pedestrian survey	Along Seward Highway corridor between MP 99–115
Seward Highway MP 99–105	Yarborough et al.	2010	Evaluation survey	Along Seward Highway corridor between MP 99–115
Seward Highway MP 105–107, Windy Corner Safety Improvements	Yarborough et al.	2014	DOE	Turnagain Arm District of the Alaska Railroad (ANC-04057)
Seward Highway MP 100–105 Improvement Project	Meitl et al.	2015	Pedestrian survey	Along Seward Highway corridor between MP 100–115
Seward Highway MP 105–107, Windy Corner Safety Improvements	Zuccotti and Kennedy	2015	Pedestrian survey	Material Site 6, between Seward Highway MP 104–105
The History of Steel Pony Truss Bridges on the Alaska Railroad	Bundy and Holt	2020	Literature review	SEW-01626, ARRC MP 86.6, Bird Creek Bridge

To reduce the length of this document, only the Findings of Effect letter to the Alaska State Historic Preservation Office(r) has been included herein. The same letter was also sent on March 26, 2025, to the following entities:

Trish Neal, President
Preservation Alaska
Alaska Association for Historic Preservation, Inc.
PO Box 102205
Anchorage, AK 99501

Kevin Keeler, Trails Administrator
Iditarod National Historic Program
Bureau of Land Management
4700 BLM Road
Anchorage, AK 99507

Chait Borade
Director, Land & Resources
Cook Inlet Region, Inc. (CIRI)
PO Box 93330
Anchorage, AK 99509-3330

Rick Harrison, President
Chickaloon-Moose Creek Native Association
P.O. Box 875046
Wasilla, AK 99687

Chief Gary Harrison
Chickaloon Native Village
P.O. Box 1105
Chickaloon, AK 99674-1105

Kyle Foster, CEO
Eklutna, Inc.
16515 Centerfield Dr., Suite 201
Eagle River, AK 99577

Iditarod Historic Trail Alliance
PO Box 2323
Seward AK 99664

Rachel Blakeslee, Executive Director
Kenai Mountains Turnagain Arm National Heritage Area
PO BOX 1934
Girdwood, AK 99587

Raymond Theodore, CEO
Knikatnu Inc.
1075 S. Check St., Ste 202
Wasilla, AK 99654

Alfred Tellman, President
Knik Tribal Council
P.O. Box 871565
Wasilla, AK 99687-1565

Tom Davis, Senior Planner
Municipality of Anchorage
PO Box 196650
Anchorage, Alaska 99519

Aaron Leggett, President
Native Village of Eklutna
26339 Eklutna Village Rd.
Chugiak, AK 99567

Tim Marshall
Heritage Program Manager
U.S. Forest Service, Chugach National Forest
161 1st Avenue, Door 8
Anchorage, AK 99501

Jeremy Karchut
Regional Historic Preservation Officer
U.S. Fish and Wildlife Service
1011 East Tudor Road, MS-235
Anchorage, AK 99503



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Anchorage Field Office
4700 BLM Road
Anchorage, Alaska 99507-2591
www.blm.gov/alaska

FEB 07 2024



In reply refer to:
8100 (AKA012)

Erik D. Hilsinger
Cultural Resources Specialist
State of Alaska Department of Transportation and Public Facilities
Design and Engineering Services, Central Region
PO Box 196900
Anchorage, AK
99519-6900

Dear Mr. Hilsinger:

The BLM Anchorage Field Office (AFO) is responding to your letter of December 22, 2023 requesting our involvement regarding the Safer Seward Highway Project. We appreciate your consultation with the BLM in our role as the Iditarod National Historic Trail (INHT) Administrator.

As federal Administrator of the INHT, BLM supports the implementation of the Comprehensive Management Plan (CMP) for the Trail, and works to ensure that the INHT management corridor is managed by all land owners in a way that supports the nature and purpose of the trail, regardless of the historic integrity of particular segments.

BLM would like to be a consulting party under the National Historic Preservation for further proceedings on this project. We would also like to note that BLM has completed an updated GIS inventory of the INHT—please contact us for a copy of the geodatabase if interested.

If you have any questions, please feel free to contact Jenny Blanchard, BLM AFO Archaeologist, at (907) 267-1341 or by e-mail at jblanchard@blm.gov, or Kevin Keeler, Iditarod National Historic Trail Administrator at (907) 903-5699 or by email at kkeeler@blm.gov. Thank you for your consultation on this project.


Sincerely,

THOMAS SPARKS

Digitally signed by THOMAS SPARKS
Date: 2024.02.06 15:44:09 -09'00'

Thomas Sparks
Acting Anchorage Field Manager

INTERIOR REGION 11 • ALASKA

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> X	
1. Article Addressed to: Erik D. Hilsinger Cultural Resources Specialist State of Alaska Department of Transportation and Public Facilities Design and Engineering Services, Central Region PO Box 196900 Anchorage, AK 99519-6900	B. Received by (Printed Name)	C. Date of Delivery <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
 9590 9402 4349 8190 6698 63	D. Is delivery address different from item 1? <input type="checkbox"/> Yes "YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for	

From: [Horne, Taylor](#)
To: [Miller, Robyn](#)
Cc: [Hosken, Kaitlyn](#); [10361516_98.5 to 118 Seward Hwy](#)
Subject: FW: Seward Highway Section 106 and Zend Mapbook
Date: Wednesday, January 10, 2024 8:22:41 AM

Taylor C. Horne

D 907.644.2172 M 907.229.7145

hdrinc.com/follow-us

From: Hilsinger, Erik D (DOT) <erik.hilsinger@alaska.gov>
Sent: Wednesday, January 10, 2024 8:20 AM
To: Keeler, Kevin <kkeeler@blm.gov>
Cc: Blanchard, Jenny H <jblanchard@blm.gov>
Subject: RE: Seward Highway Section 106 and Zend Mapbook

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I have resent the Zend To link for the Safer Seward maps with a 6 day termination for the link. I have included both the public distribution maps and the maps that include AHRS sites for your convenience. Please keep the AHRS maps secure from public disclosure per the OHA policy regarding site location information confidentiality.

[https://drop.state.ak.us/drop/pickup.php?](https://drop.state.ak.us/drop/pickup.php?claimID=nRc6Yxipj6gTmYSA&claimPasscode=93Eg4M3ENVD5ZxYE)
claimID=nRc6Yxipj6gTmYSA&claimPasscode=93Eg4M3ENVD5ZxYE
Claim ID: nRc6Yxipj6gTmYSA
Claim Passcode: 93Eg4M3ENVD5ZxYE

At this stage of the project we do not have details regarding material sources, construction storage and laydown areas and the like. This is the initiation of consultation phase for a consultant led project which may differ from previous project iterations managed by DOT&PF Central Region.

If you would like paper copies of the maps let me know where to send them and I will have them sent to you. Thanks for participating in this consultation.

Best,

E.

Erik D. Hilsinger
Cultural Resources Specialist
State of Alaska Department of Transportation and Public Facilities
Design and Engineering Services, Central Region
PO Box 196900
Anchorage, AK
99519-6900
Phone: 907-269-0534
Fax: 907 243-6927

From: Keeler, Kevin <kkeeler@blm.gov>
Sent: Tuesday, January 9, 2024 5:20 PM
To: Hilsinger, Erik D (DOT) <erik.hilsinger@alaska.gov>
Cc: Blanchard, Jenny H <jblanchard@blm.gov>
Subject: Seward Highway Section 106 and Zend Mapbook

You don't often get email from kkeeler@blm.gov. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Erik,

I never received the Zend Mapbook you mentioned in your email; wondering if you could re-send it? Hopefully it includes a depiction of the highway ROW, and areas outside of the ROW under consideration for construction effects (e.g., borrow pits, shoofly roads, etc.). Would appreciate it—thanks! Kevin

Kevin Keeler
Administrator, Iditarod National Historic Trail
BLM Anchorage Field Office
4700 BLM Rd.
Anchorage AK 99507

907.903.5699

From: [Hilsinger, Erik D. \(DOT\)](#)
To: [Miller, Robyn](#); [Horne, Taylor](#)
Subject: Safer Seward Initiation
Date: Wednesday, January 3, 2024 1:23:17 PM

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I have had a response from Eklutna Inc. and a request from CVTC.

Kyle Smith from Eklutna Inc. pointed out:

Thanks, Erik. Looking briefly through the maps, I see McHugh Creek and Rabbit Creek run through the project area. I believe the Indigenous Placemaking Project had identified McHugh Creek and Rabbit Creek for a sign post and interpretative info. Would there be a process/funding for place those sign post as part of this project? Maybe something at the McHugh Creek trailhead. Below is the link to the placemaking project.

<https://anchorageparkfoundation.org/our-work/indigenous-placemaking/>

I was part of a task force created by the Mayor to drive more commerce and new residents to Alaska. One of the initiatives was wayfinding in Anchorage and, along with that, expanding the Indigenous placemaking project. That's just for your information.

Thanks,

Kyle Smith

CVTC Deputy THPO requested copies of the maps because her network blocks ZendTo. I am sending paper copies; could you send a thumb drive?

Norma Johnson
Deputy Tribal Historic Preservation Officer
Chickaloon Native Village
P.O. Box 1105
Chickaloon, AK 99674-1105

Best,

E.

Erik D. Hilsinger
Cultural Resources Specialist
State of Alaska Department of Transportation and Public Facilities
Design and Engineering Services, Central Region
PO Box 196900
Anchorage, AK
99519-6900
Phone: 907-269-0534
Fax: 907 243-6927

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