



STB Comments on Iditarod Dog Sledding Historic District Summary and Plan

Catherine Glidden to: Barbara Hotchkin

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Hi Barb,

Below are comments provided in response to the Iditarod Dog Sledding Historic District Summary and Implementation Plan.

First, before presenting the comments, I applaud you for holding so many workshops (the PA required only a single workshop). Clearly, this resulted in greater input from the community and made you more familiar with what needed to be done to address any concerns. Thanks for this effort!

- General Comments

I think that because of the broadened range of participants, the workshops and comments tended to focus more attention on the current recreational use(s) of the area, than on the impacts of your undertaking to the Iditarod Historic District and contributing resources thereof. The adverse effects to historic properties that would occur as a result of the undertaking are handled almost as a footnote compared with discussion of current recreational uses of the project area for dog sledding. While it is wonderful that you have taken into consideration the concerns of the dog sledders, I think the Implementation Plan should provide a fuller discussion of impacts to historic properties (see Section 4.3 as an example).

For instance, existing trails that do not contribute to the district are discussed at length. This is useful for implementing other conditions in the Board's decision, but the focus of this document should be on the historic properties, impacts of the undertaking to historic properties, and measures that ARRC will put in place to mitigate any adverse effects to historic properties. I would start out with providing a discussion of the various terms used to define a historic district and impacts thereof (what is a contributing vs. non-contributing property?; what is integrity?). I think you should also explain that causing an adverse effect to a historic property (such as a bridge) is sometimes necessary for safety reasons and/or to ensure the continued use of the bridge for whatever reason(s). However, in most places in the document, it is hard to understand how a planned alteration would impact a given historic property from a Section 106 perspective and/or why an adverse effect was nevertheless viewed beneficially.

- Table 2

Table 2 (page 15) is hard to follow and I am not sure what it is saying in regards to the Section 106 process. It is also unclear what the dollar amounts mean. What is the "original design description" and how is this heading different from the "revised design description"? Why have the dollar amounts changed from one to the other? Are these crossings historic properties? If

so, will there be an adverse effect to the resource(s) as a result of any alteration?

- Add Section

I would add a section at the end (Section 4.5) that says: **Agreed Upon Implementation Measures**

Under this heading, ARRC should specify exactly what actions it will be taking to mitigate impacts to historic properties. This is only alluded to in Table 2, and elsewhere, but nowhere specifically stated in writing. This can be included in bulleted form, if desired.

- A few minor typographical errors

Page 2, delete “were contacted” at the end of the third sentence in Section 2.1.

Page 8, In the 7th bullet in Section 3.3, is the “Iditarod Race Trail” (Crossing 9) the same as the “Iditarod Dog Sled Race Trail” mentioned on Page 7? If it is, please keep the name consistent throughout.

Page 11, 2nd to last paragraph, delete the word “at” from the phrase “Assuming the Corps at issues.”

Please let me know if you have any questions regarding the above.

-Cathy

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