

EO-1864

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Revised Comments: Port Mackenzie Survey Report

Catherine Glidden to: Hotchkinb

Cc: LindamoodB, Elizabeth.Grover, shina.duvall, RutsonV

From: Catherine Glidden/STB
To: Hotchkinb@akrr.com
Cc: LindamoodB@akrr.com, Elizabeth.Grover@hdrinc.com, shina.duvall@alaska.gov, RutsonV@stb.dot.gov

Hello,

Please use the attached revised comments. I have made a few minor additions/changes to the comments I sent out yesterday. Please consider these comments final. I have also attached the edited pages again for your convenience.

Thank you.

-Cathy

Catherine Glidden
Environmental Protection Specialist
Office of Environmental Analysis
Surface Transportation Board
Washington, DC 20423
(202) 245-0293



Comments on Port MacKenzie Rail Extension Report.docx



markups.PDF

ACKNOWLEDGEMENTS

ACKNOWLEDGEMENTS

spell out here
with MSB in
parentheses

The Cultural Resources Division of MSB acknowledges that funding for the cultural resource surveys is being financed by the project through MSB. Staff for the division appreciates the opportunity to conduct a cultural resource survey within the Railroad Right-of-Way. The effort put into the Programmatic Agreement (PA) by the Surface Transportation Board enabled MSB to go forward in conducting the Cultural Resources Surveys.

The Cultural Resources Division of the Matanuska-Susitna Borough (MSB), in partnership with the Alaska Railroad Corporation (ARRC) and the Knik Tribal Council (KTC), conducted cultural resource surveys in the Area of Potential Effect (APE) that includes the 200 foot right-of-way and other ground disturbance areas. This report shall cover the field 2011 field season during which 4.5 miles of designated Segment 1 was surveyed within the railroad right-of-way, and a borrow material area in addition to a proposed Haul Road.

(the Direct APE)

Following approval of the PA by all parties, a Memorandum of Understanding was created to address the cultural resources survey and evaluation work to be undertaken by MSB in partnership with ARRC and KTC. The partnership between the three entities has been referred to as the "Working Group." We thank and appreciate all those involved in expediting the process.

We thank Joan Dale, staff in the Office of History and Archaeology, for her assistance in checking and disseminating information on pertinent Alaska Heritage Resource Survey (AHRs) sites.

what is HDR's part
in this?

A special thanks and acknowledgement is extended to KTC, HDR and ARRC, as MSB's partners in the project. On a regular basis, KTC assisted in conducting surveys and interpretation of archaeological sites. Our annual accomplishments however could not have been as extensive without the help of our volunteer Heather McCausland who assisted us, regardless of inaccessible terrain and poor weather conditions. We also wish to acknowledge Susan Howard from MSB's Geographic Information System (GIS) Department for producing the overall map and pinpointing the project's archaeological sites and areas covered by the survey.

The Cultural Resources Division would also like to thank the Borough Manager, Mr. Moosey, the Matanuska-Susitna Assembly and the Historic Preservation Commission for their support.

- Also Haul Road or Haul Road?

- Use present tense

- make sure report has consistent terms and that they are spelled the same way throughout
i.e. Cultural Resources Division vs. yes ←
Cultural Resources division - no
right-of-way vs. yes ←
Right of Way - no

explain this!
more clearly!

PORT MACKENZIE RAIL EXTENSION PROJECT

CULTURAL RESOURCE ASSESSMENT

INTRODUCTION

The Matanuska-Susitna Borough (MSB; Figure 1), in partnership with the Alaska Railroad Corporation (ARRC), has undertaken planning for construction of the Port MacKenzie Railroad Extension (PMRE) Project. In a November 2011 decision, the Surface Transportation Board (STB), the lead Federal agency for the project, ~~authorized~~ ^{approved a license, allowing} ARRC ~~a license~~ to construct and operate approximately 35 miles of new rail line connecting the Port MacKenzie District to a point on ARRC's existing main line near Houston, Alaska using the Mac East Variant-Connector 3 Variant-Houston-Houston South alignment (Figure 2). That authorization was issued after completion of an Environmental Impact Statement (EIS), and is subject to environmental mitigation conditions, ^{including a Programmatic Agreement (PA) executed by}

² ~~In particular~~, ARRC is required to comply with ~~a Programmatic Agreement (PA)~~ ^{The} developed through the Section 106 process under the National Historic Preservation Act. Although cultural resource investigations were conducted during preparation of ~~an~~ ^{the} EIS, the PA acknowledged the need for additional investigation once the STB licensed the preferred alternative and the final Area of Potential Effect (APE; Figure 3) was identified. A Memorandum of Understanding (MOU), developed in accordance with the PA, guides additional cultural resource investigations and reporting activities. Additional legal mandates and guideline are identified in the following section.

This report is the result of the cultural resource survey that ⁵ ~~was~~ ^{were} conducted during the late summer of 2011 for the ~~Port MacKenzie Rail Extension (PMRE)~~ ^{CRM} project corridor and associated components including Segment #1, the Alsop Haul Road, and the Section 6 Borrow Area. It was prepared in accordance with Stipulation 5 of the MOU implementing the PA.

^{it would be best to introduce the staff here rather than way}
Legal Mandates and Guidelines ^{back on page 6.}

The most significant federal legislation pertaining to cultural resources and pertinent to the project is the following:

- ^{add AIRFA and NAGPRA}
- the Antiquities Act of 1906 (Public Law [PL] 59-209);
- the Historic Sites Act of 1935 (PL 74-292);
- the National Historic Preservation Act of 1966 (~~PL 89-670~~) (as amended);
- the National Environmental Policy Act of 1969 (PL 91-190); ^{PL}
- the Archaeological and Historic Preservation Act of 1974 (~~PL 93-291~~); and
- the Archaeological Resource Preservation Act of 1979 (PL 96-95).

^{space} ~~The laws and regulations~~ ^{is} most pertinent to the field investigations conducted in 2011 ~~are~~ the National Historic Preservation Act of 1966 (16 USC 470 et seq.) and its implementing regulations (36 CFR 800), which requires consideration of historic properties (i.e., cultural resources eligible for the National Register of Historic Places; 36 CFR 60) that could be affected by the project. Implementation of 36 CFR 800, Section 106 establishes the review process for ~~dealing with~~ historic and archaeological properties that may be affected by federally funded projects, federal permits or projects undertaken on federal lands. ^{licensed projects}

^{Such as this one.} Page 1

^{mitigating}

The Matanuska-Susitna Borough (MSB) is a Certified Local Government [(16 U.S.C., 470a) Section 101(c)(1)] of the National Historic Preservation Act of 1966 with staff ~~capable of implementing Section 106.~~

meeting The Secretary of Interior's Professional Qualifications standards.

SURVEY METHODOLOGY

Background Research

Initial research of the region and cultural resource surveys were conducted by Stephen R. Braund & Associates (SRB&A) in 2008 to evaluate the proposed rail lines from the Parks Highway near Willow and Houston to the Port area at Point MacKenzie (SRB&A 2010a). SRB&A surveyed and tested select portions of three alignments. As reports submitted by SRB&A addressed in-depth historical background information for the project, this report does not ~~address~~ a historic context or overview of the area (see SRB&A 2010a, 2010b).

include

The area has sustained and supported multiple cultural contexts over time. The aboriginal inhabitants were the Alutiiq people and later the Dena'ina Athabascan people who had their villages on numerous inland lakes and streams. Their inter-village trails criss-crossed the region. ~~The recovery of new sites~~ within the rail corridor may assist in determining settlement patterns and land uses by people who lived in the region historically and prehistorically.

combine sections

identified

~~Project overview and APE~~ - *There is no discussion of the APE below.*

~~Standard research methods were used during the course of the investigation.~~ Prior to ~~field~~ reconnaissance, a search of pertinent archaeological and historical literature was conducted. It included research of previous historical and archaeological activities that may have been conducted in the area in addition to examination of the Alaska Heritage Resource Survey (AHRs) files, a state record of all reported paleontological, prehistoric and historic sites within the State of Alaska. SRB&A's PMRE project Section 106 reports (SRB&A 2010a, 2010b) and the Knik Arm Bridge and Toll Authority (KABATA) Historic Preservation Plan (McClenahan 2007) were key resources for this study. *the*

Other research involved examining literature relevant to the geological, physiographic, climatic and other environmental eco-niches that included fauna and flora of the region. Archaeological data and historical contexts were investigated. Historical events and contexts were studied to ensure buildings, monuments or structures 50 years or older would be readily identified. Other resources included records and oral histories available in local libraries, reports on file at the MSB, and documents and journals kept within the Anthropology Department at University of Alaska Anchorage (UAA) and in the UAA library.

use active voice

It was found that there is a fine line between historic and prehistoric sites when identifying sites characteristic of Native American dwellings and subsistence activities. Many Athabascan traditional activities and subsistence practices continued into the early 20th century. Both proto-historic and ethno-historic sites reflect the period that overlaps the prehistoric unwritten and historic written eras. Using the word proto-historic generally describes the period during initial Russian settlement on the Kenai and includes the early Russian-American trading period with the

Comments on Port MacKenzie Rail Extension Project

I have marked up a few pages of the report with edits. However, the entire report needs to be carefully edited and spellchecked. Terms that are used should be consistent throughout the report. For instance, both Right of Way and right-of-way are used on the very first page of the report. There are many other such examples.

Be certain to list all the areas that were surveyed and use consistent terms for these areas. In some places in the report it is noted that the Haul Road, 4.5 miles of Segment 1, and borrow material area were surveyed (Page ii). Elsewhere, you state that Segment 1, the Alsop Haul Road, and the Section 6 Borrow Area were surveyed (Page 1).

Legal Mandates and Guidelines

This section should be carefully edited. In the bulleted section, the National Historic Preservation Act (NHPA) of 1966 is listed as Public Law (PL) 89-670. PL 89-670 is actually the DOT Act, not NHPA.

General Organization of the Report

The report needs to be reorganized as it is difficult to follow and is confusing in places. I would recommend using the general heading of **"Results of Archaeological Investigations"** rather than **"Survey Methodology"** on Page 2. Then, rather than jumping right into a discussion about the background research that was conducted, I would insert several paragraphs that describe in general what was done (background research, development and use of the predictive model, results of the field investigations/surveys). This general discussion should also introduce the staff and the educational backgrounds of the individuals that worked on various items described in the report. There should also be a statement regarding which individuals meet the Secretary of Interior's Professional Qualifications Standards as required under the PA.

This new section would be followed by the discussion of the background research conducted under the current **"Background Research"** heading. However, I would delete the **"Project Overview and APE"** heading as there is no discussion about either topic under this heading. Rather, the discussion is a continuation of the background research that was completed. The background research section should also include the summary of the previous sites that have been identified in the project area (currently located on Page 5).

I would then integrate the discussion of the model that was used to aid the field staff in their investigations under the heading **"Development of Predictive Model."** The way it is currently described is not at all clear. I am assuming that the model used for this investigation was based largely on a model that was developed by SRB&A in 2010 and one perhaps used in the KABATA plan. I would thus make a clearer statement about how you arrived at the model that was used. I would also combine the discussion of the model on Page 3 with the discussion about the model on bottom of Page 4.

After you have reorganized the above, you should then present your survey results.

The summary section (including Table 1) provides results that are not entirely consistent with the information discussed in the report. This is particularly the case with regards to the Haul Road and Site TYO-00276.

The Haul Road

Statements indicating that the Haul Road is no longer part of the APE need to be eliminated from the report.

The Haul Road is part of the direct impact APE as agreed to by the Working Group. This Final APE document including corresponding maps (showing both direct and indirect APE) was sent to the STB and the AK SHPO for a 15-day review period on December 30, 2011. I provided my concurrence with the Final APE for the project in a 1/17/2012 email to you. I also requested at the time that you send me any comments that had been received in reference to the Final APE. No comments were sent and none evidently received, thus the document remained unchanged. Therefore, the Haul Road should have continued to be considered part of the direct impact APE and any sites that were identified in that area should have been thoroughly evaluated. Since Site TYO-00276 was not evaluated by your survey team, the STB is now forced to assume the National Register eligibility of the site.

Maps

The maps should be labeled more clearly so that the information contained on each map fits its corresponding label(s) and key symbols. For instance, Figure 4 is labeled at the bottom as a map of high probability areas. However, at the top of the map there is a label that describes the map as the “2011 MSB Survey with Cultural Resources Probability.” Strangely, the map key does not list any 2011 survey tracts, only 2008 tracts. The key also lists low, medium **and** high probability areas (not just high probability areas). There is also a dark blue line that is not labeled.

Photos

Most of the photos are too small and are difficult to make out. Please enlarge the photos and make the captions clearly correspond to each photo. The photo regarding the Section 6 soil profile is particularly difficult to see.

General Comments

- Use active, not passive voice.
- Assign each photo with a photo number so that they can be referenced in the report.
- Include a Photo Section within the Table of Contents.
- Site TYO-00276 must be fully described and assumed eligible. The site must also be described uniformly through the report.

