



THE STATE
of **ALASKA**

GOVERNOR BILL WALKER

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION

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December 11, 2014

File No.: 3480 STB PORT MACKENZIE RAIL EXTENSION

Brian Lindamood
ARRC Project Manager
Alaska Railroad Corporation
PO Box 107500
Anchorage, AK 99510

Subject: Port MacKenzie Rail Extension (PMRE) Project, Multiple Property Documentation: Iditarod Dog Sledding Properties in the Point MacKenzie Area

Dear Mr. Lindamood:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence (dated September 18, 2014) on September 22, 2014. We also appreciate the opportunity our staff had to meet with representatives from the Alaska Railroad and their consultant, as well as the Surface Transportation Board on November 18, 2014.

Per our consultation meeting on November 18, a subsequent review of the subject report and the responses to our July 2 comments, and additional discussion amongst our staff, we offer the following final comments on the report for your consideration. We understand the Alaska Railroad's intent and need to finalize the document at this time, despite the fact that we may continue to disagree on some specifics therein. General comments are provided below and some editorial suggestions and comments are tracked within the electronic version of the report (printed and attached in hard copy).

General comments:

1. First, a significant point of discussion and disagreement relates to whether the Stephen Braund & Associates (SRB&A) report should be used and incorporated by reference as the primary resource for the historical context (Working Group and Alaska Railroad position) or if this document should serve to build upon and add to that past research (SHPO position). If no additional research is planned to build upon the SRB&A report, we recommend simply citing it as the sole source for the historic context section of this document and appending it in its entirety to this document. We do not recommend excerpting portions of that document to include as the historic context section of this document.
2. The existing historic context as it stands needs significant work.
3. While the SRB&A represents an impressive and important body of work, our early correspondence acknowledged that it needed further research and development of concepts. For example, future researchers interested in the history of dog sledding in this area and across the State (using the SRB&A report and this Multiple Property document, among others, as baseline documentation), may find the need for a more developed history of the emergence of dog sledding as recreation in general, which may include but also broaden the focus from the Iditarod trail and race.
4. In the future, we maintain that the Period, Level, and Area of Significance for the Multiple Property need to be revisited and refined.

5. We object to the requirement that trails need to have a legal or established right-of-way in order to be considered significant under this Multiple Property. Legal or established rights of way have no relevance to the historical significance of a trail under the National Register of Historic Places (NRHP).
6. The document intends to evaluate four properties that are located within the area of potential effects (APE) for their eligibility to the NRHP. We do not believe that the document provides sufficient information for the SHPO to concur with the eligibility recommendations. While the overarching historic context (from SRB&A) can guide the evaluation of the trails, the determinations of eligibility (DOEs) still need much more developed research on the individual trails that are being evaluated. At a minimum, for these specific properties for which a DOE is being made, we recommend pulling information from the SRB&A report to support the basis for the eligibility call. Secondly, for these DOEs, we recommend more clearly working through the steps of the evaluation process established in the Multiple Property document (i.e., present historic context, address significance criteria, address characteristics / features, address integrity, establish eligibility).
7. In several areas, the document appears to mix/blend significance and integrity. We recommend ensuring that these are clearly defined and distinguished from one another.

Additional and final comments and suggestions are provided in the attached. At this time, given the Alaska Railroad's intent to finalize the document, we propose as a resolution that the Railroad and STB consider our above and tracked in-text comments and determine which, if any, will be addressed. When the final version is submitted to our office for our records, we will note outstanding areas of disagreement in the file so that future users / researchers will have an understanding of the record of consultation.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer