

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF MINING, LAND & WATER SOUTHCENTRAL REGION LAND OFFICE

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Brian Lindamood
Alaska Railroad Corporation
327 W Ship Creek Avenue
Anchorage, AK 99501

RE: Comments on the Draft Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan

Dear Mr. Lindamood:

The Department of Natural Resources (DNR), Division of Mining, Land and Water (DMLW), Southcentral Regional Office (SCRO) has reviewed the draft *Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan* for the Port MacKenzie Rail Extension Project and have the following comments:

The Project Overview states that this document is to comply with Stipulation V of the PA, Mitigation Measure 92 and Mitigation Measure 93. Mitigation Measure 92 deals with reports required to relocate any *officially recognized trail*, while Mitigation Measure 93 is to identify the location and use of all trails contributing to the Iditarod Dog Sledding Historic District (IDSHD) and determine which are needed for connectivity. By combining these items into one report it is difficult for a reader to separate these different issues (historic/non-historic dog mushing trails in the IDSHD and non-dog mushing or non-historic officially recognized trails that are being rerouted). Please separate the documents so that the IDSHD implementation plan contains items specific to the district, not just the rail project in general.

An implementation plan usually is one of the final document produced, but according to the draft the following items still need to be completed/resolved:

- Additional crossings between Crossing 2 and 10
- Iron Dog Connector Trail crossing resolution
- Changes in the alignment following the FAA decision, and any effects this may have on trails in the area. There is a request for review and comments by the consulting parties on the new alignment in the implementation plan. An implementation plan usually implements the review and comments, not requests it.
- A draft report one year after the implementation plan on the IDSHD that will identify the district boundaries, what is significant and contributing.
- Additional consultation on various trails and *possible* reroutes

How will the above items be implemented by the plan, if they have yet to be resolved?

The workshops were primarily focused on the Officially Recognized Trails (Mitigation Measure 92), not the question of connectivity and what properties contribute to the district. At the January 11, 2012 meeting, John Brautigan of the Knik Dog Mushers Association and Knik Iditarod Trail Blazers formally commented on this and asked when Mitigation Measure 93 would be discussed. He inquired if the meetings were meant to comply with Mitigation Measure 93, because the group had not been asked where all the trails that could contribute to the district are and which are needed for connectivity.

Instead, the group had been addressing the Officially Recognized Trails (Mitigation Measure 92). His comment is not listed in the enclosed table, nor is it addressed.

The enclosed maps appear to indicate that the stream crossings that do not have trails on them are being counted as crossing locations for the Iditarod Dog Sledding Historic District. Is this project proposing to construct trails to these structures? What do they have to do with the district? This may reflect the first issue listed above about combining trail issues outside of the district into the implementation plan designed specifically for it.

Page 4 states: *"The Project Team did not receive substantive comments from participants regarding the APE, except that some participants suggested that the APE should be broader to include potential indirect effects, particularly in areas where trails cross the project right-of-way."* What is meant by indirect effects? Are they concerns about connectivity, future development (both were brought up by participants) or something else? The effects and how they interact within the APE could be important to the district and the implementation plan.

Page 9 states: *"The restrictions also resulted in the loss of one previously planned crossing (e.g., the Outflow of Muleshoe Lake could not meet the 14' of vertical clearance required)."* Given the description on Page 11, isn't the loss of this crossing due to the FAA denial for the rail line? If so, why is it in this section, as the rail line is not crossing at this location. Additionally, some of the maps in the main document have the old rail alignment and some have the new one west of Muleshoe Lake. Please standardize the maps so that the current rail alignment is used throughout.

Thank you for the opportunity to review this document. If you have any questions, please do not hesitate to contact me.

Sincerely



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