



PMRE-Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan

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On behalf of the Alaska Railroad Corporation:

Hello,

Thank you for your continued interest and participation in the Port MacKenzie Rail Extension (PMRE) Iditarod Dog Sledding Historic District (IDSHD) Workshop series. In accordance with the PMRE Project Programmatic Agreement (PA; Stipulation V) and Mitigation Measures 92 and 93 of the final decision issued by the Surface Transportation Board (STB) in November 2011 (Docket No. FD 35095), the Project Team conducted workshops (6/28/2011, 7/7/2011, and 1/11/2012) and an open house for all trail users in the project area (10/27/11). Comments and feedback from a variety of trail users, as well as other parties interested in the IDSHD, allowed the Project Team to identify design changes, modifications, and/or refinements to the project to facilitate connectivity and use of trails in the project area during and after construction.

The Project Team provided a copy of the *Draft Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan* to you on March 1, 2012 for a 30-day review and comment period. Comments were received from STB; the State Historic Preservation Officer (SHPO); and the Alaska Department of Natural Resources, Division of Mining, Land and Water, Southcentral Regional Office (ADNR, DMLW, SCRO). To respond to these comments, the Project Team has revised the *Implementation Plan* as follows:

- Added additional detail and graphics into the body of the document to provide further clarification regarding mitigation measures being implemented;
- Provided firm commitments (e.g., remove “will continue to discuss” language where possible);
- Provided contingencies for resolutions to issues that are not currently resolved (e.g., MSB obtaining easements for specific trails or trail relocations);
- Provided additional narrative regarding change in workshop focus from individual trails as contributing elements and historic use to access/connectivity of the current trail network;
- Provided additional narrative to explain why ARRC combined reporting for PA and ROD mitigation measures into a single document;
- Added a glossary of terms (e.g., cultural landscape, contributing element, etc.) as an attachment; and
- Provided timeframes that address the project and when the public will be expected to participate in the future.

The revised *Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan* and attachments have been posted on the Project website (<http://www.portmacrail.com/library.html>). If you do not have access to the website and/or would like an electronic copy on a disk or a hard copy of these materials, please reply to this message with a mailing address and the Project Team will send you a copy.

If you have questions, please contact Brian Lindamood at (907) 265-3095, or by email at lindamood@akrr.com. You may also contact Barbara Hotchkin at (907) 265-2313 or hotchkinb@akrr.com.

Thank you and happy holidays!
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Iditarod Dog Sledding Historic District Workshop Summary
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Contents

1	Introduction	1
1.1	Project Overview	1
1.2	Purpose of the Document	1
2	Method for Developing the Implementation Plan	3
2.1	Consultation	3
2.2	Workshops/Meetings.....	5
2.3	Identification of Mitigation Measures	9
3	Descriptions	9
3.1	Area of Potential Effect (APE).....	9
3.2	Iditarod Dog Sledding Historic District (IDSHD).....	10
3.3	Officially Recognized Trails	12
4	Summary of Issues, Outcomes, and Mitigation Commitments.....	13
4.1	Participant Comments/Concerns	13
4.2	Constraints.....	13
4.3	Implementation Measures based on Workshops/Meetings	14
4.4	Additional Implementation Measures	29

Tables

Table 1: Summary of Mitigation Measures	2
Table 2: IDSHD Meeting Summary	6
Table 3: Summary of IDSHD Workshop Comments/Issues and ARRC Mitigation Commitments	33
Table 4: Trail/Crossing Summary.....	37

Exhibits

Exhibit 1: Iditarod NHT crossing design before and after the IDSHD Workshops	16
Exhibit 2: Approach example	17
Exhibit 3: Crossing 5 profile view	20
Exhibit 4: Proposed Iron Dog and Flat Lake Connector Trail Reroutes and Crossing (Crossing 5)	21
Exhibit 5: Possible Iditarod Race Trail Reroute and Crossings.....	23
Exhibit 6: Connectivity between Crossings 7 and 10	25
Exhibit 7: Signage examples presented at the MSB Trail User Open House (10/27/11)	26
Exhibit 8: Willow Trail System Kiosk.....	27
Exhibit 9: Kiosk schematic (Department of Natural Resources).....	27
Exhibit 10: Big Lake Trail #2 Reroute	30
Exhibit 11: Houston Lake Loop Trail Reroute	31

Figures

Figure 1: Project overview and crossing locations	A-3
Figure 2: Area of Potential Effect (APE).....	A-4
Figure 3: Constraints.....	A-5
Figure 4: Trail connectivity	A-6

Attachments

Attachment A.....	Figures
Attachment B.....	Glossary
Attachment C.....	IDSHD Consulting Parties and Participants
Attachment D.....	Workshop 1 Summary and Materials
Attachment E	Workshop 2 Summary and Materials
Attachment F.....	MSB Trail User Open House Summary and Materials
Attachment G.....	Workshop 3 Summary and Materials
Attachment H.....	Draft Document Reviewer Comment and Response Summary

List of Acronyms/Abbreviations

ACHP	Advisory Council on Historic Preservation
ADNR	Alaska Department of Natural Resources
APE	Area of Potential Effects
ARRC	Alaska Railroad Corporation
ATV	All-Terrain Vehicle
BLM	Bureau of Land Management
BMBF	Bulk Material Bi-modal Facility
CBD	Concrete Ballast Deck
CFR	Code of Federal Regulations
Corps	U.S. Army Corps of Engineers
DMLW	Division of Mining, Land and Water
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
HDR	HDR Alaska, Inc.
HTK	Happy Trails Kennels
IDSHD	Iditarod Dog Sledding Historic District
KTC	Knik Tribal Council
LRTP	Long Range Transportation Plan
MEA	Matanuska Electric Association
MHLT	Mental Health Land Trust
MOU	Memorandum of Understanding
MP	Milepost
MSB	Matanuska-Susitna Borough
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHT	National Historic Trail
NPS	National Park Service
NRHP	National Register of Historic Places
PA	Programmatic Agreement
PMRE	Port MacKenzie Rail Extension
ROD	Record of Decision
ROW	Right-of-way
SCRO	Southcentral Regional Office
SHPO	State Historic Preservation Officer
SnoTRAC	Snowmobile Trail Advisory Committee
SOI	Secretary of Interior
SPUD	Special Land Use District
SRB&A	Stephen R. Braund & Associates
STB	Surface Transportation Board
UA	University of Alaska
USGS	U.S. Geological Survey
VORTAC	VHF Omnidirectional Range/Tactical Aircraft Control
WDMA	Willow Dog Musers Association

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1 Introduction

1.1 Project Overview

The Alaska Railroad Corporation (ARRC), in partnership with the Matanuska-Susitna Borough (MSB), has undertaken planning for construction of the Port MacKenzie Rail Extension (PMRE) Project. In a November 2011 decision, the Surface Transportation Board (STB) approved a license allowing ARRC 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 (Attachment A, Figure 1). That authorization was issued after completion of an Environmental Impact Statement (EIS), and is subject to environmental mitigation conditions, including a Programmatic Agreement¹ (PA; executed 5/25/2011) executed by STB, the Alaska State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP).

The PA identifies mitigation measures to address possible effects to historic properties², including the Iditarod Dog Sledding Historic District (IDSHD). Stipulation II of the PA identifies the process for developing an Area of Potential Effect (APE), within which effects to historic properties such as the IDSHD shall be considered. Stipulation V of the PA (*Treatment of the Iditarod Dog Sledding Historic District*), as well as Mitigation Measures 92 and 93 in the Record of Decision (ROD) for the Final EIS, identify mitigation for adverse effects to the IDSHD, that are addressed through preparation of this *Workshop Summary and Implementation Plan (Implementation Plan)* that has been developed in consultation with STB, SHPO, and parties interested in the IDSHD.

1.2 Purpose of the Document

ARRC, in consultation with the Working Group³ and SHPO, has drafted this document to report on compliance with the requirements of the PA (Stipulations II.D and V) and ROD (Mitigation Measures 92 and 93). This document combines reporting for the PA and ROD mitigation requirements into a single document rather than multiple separate documents because ARRC believed that these requirements include overlap such as discussion of trail use and impacts to users of the existing trail system in the APE as well as consultation with the same interested parties. In addition, combining the requirements into one document is supported by the PA, which required that ARRC submit plans for grade separation and other mitigation measures (e.g., relocations of officially recognized trails and design changes) included in the ROD during the IDSHD workshop(s) and summarize the outcome of the workshop(s) in an Implementation Plan. Table 1 summarizes PA and ROD mitigation measures addressed in this document.

¹ The PA was developed through the Section 106 process under the National Historic Preservation Act (NHPA)

² See Attachment B, *Glossary*, for definitions of selected terms used throughout the document.

³ The Working Group is comprised of ARRC, MSB, and KTC representatives with input from STB and SHPO.

Table 1: Summary of Mitigation Measures

Mitigation Measure or PA Stipulation	Location in Document - How Addressed
PA Stipulation V.A.1 Hold a workshop with parties interested in the IDSHD (within 60 days of STB licensing an alternative) to delineate the boundaries of contributing features within the APE, how they continue to be used for their historic function, and how that function could be maintained during and after construction.	Sections 2.1, 2.2, and 3.2 ARRC held a series of workshops, and MSB held an open house, with dog sledders and other trail users interested in the IDSHD and trails impacted by the project. These meetings were held in consultation with the STB and SHPO. Based on comments at the meetings, it became clear that the trail users were more concerned with continued access and connectivity within the IDSHD than in identification of contributing trails. Therefore, the focus of the workshops shifted from delineating the boundaries of contributing features, historic function, and how to maintain this function to identifying ways to maintain safe access and connectivity for trail users.
PA Stipulation II.D Delineate the proposed final APE for the Undertaking using ARRC's final construction plans and the APE definition in PA Stipulation II.C.	Section 3.1 and Figure 2 ARRC, in consultation with IDSHD workshop participants, the Working Group, SHPO, and STB, developed a proposed final APE that was submitted to STB and SHPO and approved in January 2012.
ROD #92, ROD #93, and PA Stipulation V.B Prepare a draft report that: • Identifies sources and parties consulted on proposed trail relocations and trail use • Summarizes discussions/meetings with interested parties • Identifies officially recognized trails to be relocated, rather than provided with grade-separated or at-grade crossings, the rationale for the relocations and potential impacts to existing trail users if the trails are relocated rather than provided grade-separated crossings • Identify location and use of trails contributing to the IDSHD • Develop an Implementation Plan Provide a copy of the draft report (30-day review/comment period) to consulting parties; prepare a final report (that also summarizes substantive comments/ responses) and submit to consulting parties.	Sections 2.1, 2.2, 3.2, 3.3 and 4.0; Tables 2 and 3; Attachments D - H ARRC, in consultation with the Working Group and SHPO, prepared a draft <i>IDSHD Workshop Summary and Implementation Plan</i> that: • Identifies consulting parties • Summarizes the IDSHD Workshops and MSB Trail User Open House • Identifies officially recognized trails that may be relocated, rationale for their relocation, and potential impacts to trail users from the relocations • Describes the IDSHD trail system and use (see response for PA Stipulation V.A.1) • Provides implementation measures/ commitments to maintain access and connectivity This report was submitted to all parties to the PA and workshop/open house participants for a 30-day review in March 2012. The final report, which includes a summary of comments received and ARRC's responses, will be provided to all PA parties and workshop/open house participants.

Mitigation Measure or PA Stipulation	Location in Document - How Addressed
PA Stipulations V.A.2, V.A.3, and V.C; ROD #93 Submit plans for design changes, modifications, and refinements (e.g., grade separation and other mitigation measures specified in the ROD) for review and discussion during the workshop. These proposed design changes shall seek to avoid, mitigate, or minimize adverse effects on the IDSHD. Treatment of contributing trails to the IDSHD that are used for dog sledding and are necessary to maintain the connectivity of the IDSHD could include grade-separated crossings, relocation of trails, and/or other mitigation to allow for continued access and connectivity.	Sections 2.2 and 4.3, Table 3 and Attachments D - G This plan does not identify trails contributing to the integrity of the IDSHD for reasons previously mentioned. However, it does discuss trails that are being used for dog sledding and recreational activities and crossings to be provided to allow continued connectivity of these trails. ARRC provided plans for crossings, trail improvements, and trail relocations at the various IDSHD workshops and open house. Changes to project design consider workshop participant comments and endeavor to minimize adverse effects to the IDSHD by maintaining access and connectivity. Project design minimizes adverse effects to the IDSHD by maintaining safe access and connectivity through at-grade and grade-separated crossings, trail relocations, and trail improvements.

ROD Mitigation Measure 93 and PA Stipulation V focused on trails contributing to the IDSHD; however, consultation with the SHPO and parties interested in the IDSHD indicated identifying a way to maintain access and connectivity of the current trail network should be the priority of mitigation measures. This is a shift in focus from identifying individual trails as contributing elements to a historic district to maintaining the current and historic use of these trails. Further discussion regarding the change in focus of the IDSHD consultation is included in Section 2.2.1; further discussion of the IDSHD is included in Section 3.2.

2 Method for Developing the Implementation Plan

2.1 Consultation

Consultation began with identification of appropriate consulting parties. The initial list was based on consulting parties identified in the PA as being interested in the IDSHD (e.g., Happy Trails Kennels [HTK], Willow Dog Mushers Association [WDMA], Knik Tribal Council [KTC], and MSB; see PA Stipulation V). In addition to SHPO, the Working Group, and consulting parties identified in the PA, the Project Team⁴ contacted other dog mushers and parties known to be associated with dog sledding and other trail use in the project area. The consulting party list for the IDSHD workshops and open house is included in Attachment C.

Project Team members have been meeting with key property owners (e.g., Alaska Department of Natural Resources [ADNR], University of Alaska [UA], Mental Health Land Trust [MHLT]), key interests (e.g., Federal Aviation Administration [FAA]), and trail users throughout project development. ARRC consulted with the Working Group and SHPO, and their representatives participated in planning for and attended the IDSHD workshops and the MSB Trail User Open House. They also participated in developing the *Comment Resolution Summary* provided to consulting parties as part of IDSHD Workshop 3 (Attachment G) and this *Implementation Plan*.

⁴ The Project Team consists of ARRC, MSB, and their consultants.

Agencies and organizations contacted for participation in the IDSHD workshops and the MSB Open House included:

- ADNR
- Aurora Dog Mushers Club
- Big Lake Trails, Inc.
- Bureau of Land Management (BLM), Iditarod National Historic Trail (NHT)
- Dream a Dream Dog Farm
- Homestretch Kennel
- HTK
- Iditarod Historic Trail Alliance
- Iditarod Trail Blazers
- Iditarod Trail Committee
- Iron Dog Race
- Junior Iditarod Sled Dog Race
- Knik Dog Mushers Association
- Knik 200 Joe Redington, Sr., Memorial Sled Dog Race
- KTC
- MSB
- Mat-Su Trails Council, Inc.
- Northern Lights 300 Sled Dog Race
- Perseverance Springs Farm
- SHPO
- WDMA
- Willow Trail Committee

The Project Team used a revised consulting party list for the invitation for the first IDSHD workshop and asked invited participants to forward the invitation to other individuals they thought might be interested in attending. This process was followed for each IDSHD workshop and meeting. Persons who received forwarded invitations were added to the consulting party list. In addition, the consulting party list was revised based on sign-in sheets at each IDSHD workshop and meeting. Communications with consulting parties were conducted in person as well as via email and telephone. The Project Team posted IDSHD-related events and associated materials on the project website and notified consulting parties when the materials had been posted.

A draft *Implementation Plan* was sent to PA Signatories, Invited Signatories, Concurring Parties, and persons interested in the IDSHD (i.e., workshop participants) for a 30-day review and

comment period on March 1, 2012. Comments were received from STB; SHPO; and the ADNR, Division of Mining, Land and Water (DMLW), Southcentral Regional Office (SCRO). No comments were received from Concurring Parties or workshop participants. ARRC, in consultation with the Working Group, STB and SHPO, reviewed these comments and incorporated revisions to this document as deemed appropriate (see Attachment H for further detail regarding comments and responses)⁵. In a meeting on April 10, 2012, STB and SHPO requested that ARRC make the following revisions to the document to address comments received:

- Add additional detail and graphics into the body of the document to provide further clarification regarding mitigation measures being implemented;
- Provide firm commitments (e.g., remove “will continue to discuss” language where possible);
- Provide contingencies for resolutions to issues that are not currently resolved (e.g., MSB obtaining easements for specific trails or trail relocations);
- Provide additional narrative regarding change in workshop focus from individual trails as contributing elements and historic use (see Table 1) to access/connectivity of the current trail network;
- Provide additional narrative to explain why ARRC combined reporting for PA and ROD mitigation measures into a single document;
- Add a glossary of terms (e.g., cultural landscape, contributing element, etc.) as an attachment; and
- Provide timeframes that address the project and when the public will be expected to participate in the future.

ARRC is providing this final *Implementation Plan* to PA Signatories, Invited Signatories, and other interested consulting parties and has posted this document on the project website (<http://www.portmacrail.com/library.html>). Should further changes to the *Implementation Plan* be required because of changes to crossings, that information will be conveyed to all parties prior to final project design and construction.

2.2 Workshops/Meetings

The IDSHD workshop series and the MSB Trail User Open House addressed both dog sledding and officially recognized trails relative to crossings types, trail relocations, and maintenance of connectivity to inform mitigation measures for addressing impacts to the IDSHD. Section 2.2.1 provides a summary of the methodology and discussions at the workshops/open house. Attachments D through G provide workshop/meeting materials, including materials presented or distributed and sign-in sheets. A discussion of workshop/meeting participants’ substantive comments as well as the Project Team’s responses and ARRC’s mitigation commitments are included in Section 4.3. Table 2 includes a summary of the IDSHD meetings held to date. A

⁵ Mitigation Measures 92 and 93 require that all substantive comments from reviewers on the draft document and ARRC’s responses be summarized and included in the final document.

summary of workshop/meeting participants’ substantive comments with the Project Team’s responses and mitigation commitments is included in Table 3.

Table 2: IDSHD Meeting Summary

IDSHD Workshop #	Workshop Date	Workshop Location	# of Attendees
1	6/28/11	Willow Area Community Organization Center Willow, Alaska	26
2	7/7/11	Big Lake Library Big Lake, Alaska	20
N/A ⁶	10/27/11	Houston High School Houston, Alaska	41
3	1/11/12	Houston Middle School Houston, Alaska	23

2.2.1 Summary of the IDSHD Workshop Series and MSB Trail User Open House

The PA stipulates that ARRC, in consultation with STB and SHPO, hold a workshop⁷ with parties interested in the IDSHD, including HTK, WDMA, KTC, and MSB. The initial purpose of the workshop was to “delineate the boundaries of contributing features within the APE of the alternative licensed by the STB; discuss which are still used for their historic function; and determine how that historic function could be maintained during and following construction of the Undertaking” (PA Stipulation V.A.1). The PA also stipulates that the Working Group consult with HTK, WDMA, and other concurring parties interested in the IDSHD to delineate the proposed final APE for the project (PA Stipulation II.D).

The goals/purpose of IDSHD Workshop 1 (see Attachment D for workshop materials) were designed to fulfill the goals of the PA and included:

- Providing a project update and background;
- Soliciting input/comments on the APE;
- Identifying/discussing important features, functions, and uses of IDSHD trails/structures in the APE;
- Identifying/discussing potential mitigation measures for IDSHD trails/structures in the APE to ensure continued functionality and connectivity of trails; and
- Identifying the need for future workshops/meetings.

⁶ This MSB-sponsored open house was held for trail users at the request of the IDSHD Workshop participants.

⁷ While the PA only requires one workshop with parties interested in the IDSHD, SHPO advised ARRC during planning that the workshop’s goals likely could not be met in a single meeting. Therefore, ARRC held a series of workshops.

Following a formal presentation, participants were divided into smaller working groups. Each group had a facilitator who posed a series of questions⁸ to participants.

- Does the proposed APE encompass the areas where impacts would likely occur? If not, where should the APE be altered to include these areas?
- What are important features, functions, and uses of IDSHD trails/structures in the proposed APE (e.g., access and connectivity, visual way finders, or different/distinct uses [freight, training, races])?
- Do you feel that the PMRE project will affect dog sledding or the features, functions, and uses of IDSHD trails through the proposed APE? If so, how?
- What can be done to further reduce these impacts?

Following the break-out session, participants reconvened to present questions and comments raised by each group. While break-out session questions were designed to obtain information on IDSHD contributing features and use, participant discussions and comments focused primarily on effects of the project including current and future access, safety, and connectivity concerns. 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 (i.e., foreseeable effects caused by the action that is later in time or farther removed in distance; see Attachment B, Glossary), particularly in areas where trails cross the project right-of-way (ROW). Further discussion of the APE is included in Section 3.1. Participants stated that future workshops were desired. As a follow-up to this, Workshop 1 participants were asked to self-identify as being interested in participating in a smaller focus group whose original purpose was to further discuss the APE and provide information regarding historic trails and features within the IDSHD (see Attachment D).

Based on Workshop 1 participant comments and further consultation with SHPO and the Working Group, the focus of the IDSHD workshops was shifted from the purpose stipulated in the PA and ROD Mitigation Measure 93 (i.e., to identify contributing features of the IDSHD within the APE and historic function/use) to maintaining continued access, use, and connectivity of trails. Because the proposed rail line bisects the IDSHD, SHPO emphasized that the continued functionality of the IDSHD and use for dog sledding were more important than identifying individual contributing features. It was clear from participant comments that the significance of the IDSHD lies not in individual features, although trails such as the Iditarod Race Trail and the Iditarod NHT did stand out as being of particular importance to participants in general, but rather in the network of trails and other features (see Section 3.2 for further discussion of the IDSHD).

In line with the modified focus from historic to continued/future use of the trail system that comprises the IDSHD, the goals/purpose of IDSHD Workshop 2 (Attachment E) were to:

- Review and clarify Workshop 1 comments;

⁸ Questions were developed in consultation with the Working Group and SHPO.

- Develop and address the location and design of trail crossings to minimize or mitigate impacts to important characteristics of the IDSHD focusing on connectivity and use of the landscape; and
- Discuss the proposed APE (revised per input from Workshop 1).

Participants were provided with a summary of Workshop 1 comments/issues and revised APE maps prior to the meeting (see Attachment E). The Project Team presented each comment/issue and asked participants for further information or clarification. Comments focused primarily on access, safety, and connectivity, including recommendations for additional crossings and trails to maintain access and connectivity and revisions to crossing and approach designs to enhance safety. Workshop participants indicated that they wanted to ensure that trail users other than dog mushers were allowed a chance to comment on maintaining trail access and connectivity. Therefore, they requested that Workshop 3 be postponed until after a larger meeting was held with all trail users. As MSB was taking the lead on addressing general trails issues associated with the project, the Project Team decided to have MSB organize and sponsor this larger trail users meeting with input and participation from Working Group and SHPO representatives.

Based on the input from IDSHD Workshop 2 participants, the goals/purpose of the MSB Trail User Open House (Attachment F) were to:

- Ensure that trail users other than dog mushers were being heard regarding project impacts to trail connectivity and use;
- Present trail network connections for continued connectivity and use; and
- Listen and gain feedback from trail users.

The open house included stations for the different use areas within the project area (e.g., Willow, Big Lake, and Point MacKenzie) as well as stations dedicated to MSB trail designation and Section 106 activities. The use area stations were staffed by local users. Project Team members and SHPO circulated between stations to answer participants' questions and receive comments. Similar to the IDHSD workshops, participant comments focused primarily on access, connectivity, and safety issues.

The IDSHD Workshop 3 was held after the MSB Trail User Open House. The purpose of this workshop (Attachment G) was to:

- Present/discuss the Project Team's proposed resolutions to participant comments received to date; and
- Create understanding – the Project Team has heard, considered, and addressed participant comments where practicable.

The format of this workshop was a presentation of summarized issues identified at the two previous IDSHD workshops and the MSB Trail User Open House with an opportunity for participant questions and comments following each issue. Comments again focused primarily on maintaining access and connectivity as well as safety issues. Workshop participants indicated that they felt the Project Team had accurately captured their comments and had provided adequate responses to the majority of these comments (see Section 4.3 for a discussion of issues and project commitments and Table 3 for a summary of participant comments/issues and Project Team responses/commitments).

2.3 Identification of Mitigation Measures

Comments received at the IDSHD workshops focused primarily on maintaining and ensuring access, connectivity, and safety. Through comments and discussions at the IDSHD workshops/open house, as well as the Project Team and Working Group meetings, the Project Team developed plans for grade separation and other minimization or mitigation measures (e.g., crossing design changes, modifications, and refinements as well as trail improvements and reroutes). Additional information regarding minimization or mitigation measures is included in Section 4 (Summary of Issues, Outcomes, and Mitigation Commitments), Table 3 and Table 4.

3 Descriptions

3.1 Area of Potential Effect (APE)

STB, in consultation with SHPO, established an APE for the project during studies conducted under Section 106 and the EIS. The PA stipulates that the Working Group, in consultation with HTK, WDMA, and other consulting parties interested in the IDSHD, shall review ARRC's final construction plans, apply the APE definition provided in PA, and delineate the proposed final APE for the Undertaking within 60 days of STB issuing a license for the project (PA Stipulation II.D). As the target audience for the IDSHD and APE discussions involved the same consulting parties, the Working Group and SHPO decided to consult with these parties regarding APE at the IDSHD workshops.

The Project Team provided an explanation of APE and presented a proposed project APE to Workshop 1 participants (see Attachment D). This proposed APE included a 200-foot ROW (100 feet on either side of the rail centerline) and other ground disturbance areas that may be outside the 200-foot ROW (e.g., staging areas, cut and fill areas, material sources, etc.).

Further discussion was conducted at Workshop 2, including additional explanation of APE and presentation of maps showing the Working Group's proposed delineation of the project APE (Attachment E). Participant's requested that the Working Group consider indirect effects (e.g., visual, noise, increased trail user-moose conflicts, and increases in population resulting in loss of trails) while defining the final APE. As a result of this request and consultation with SHPO, the Working Group defined an indirect APE, in addition to the previously delineated 200-foot APE for direct effects, that includes an area of one mile maximum⁹ on either side of the rail centerline. No objections were raised to the proposed final APE by workshop participants.

Following the Working Group's presentation of the proposed APE, discussion with workshop participants, and consultation with SHPO, ARRC submitted the proposed final APE to STB and SHPO for review and comment on December 30, 2011. SHPO (January 9, 2012) and STB (January 17, 2012) indicated that they had no objections to the proposed APE.

Changes in project design required a modification to the APE in the northernmost portion of Segment 6 (e.g., access and material storage) and in Segment 5 near Muleshoe Lake (realignment of the proposed rail ROW; see Section 4.2 for further discussion). ARRC submitted proposed modifications of the proposed final APE to STB and SHPO on March 9, 2012. SHPO (March 16,

⁹ The APE for indirect effects may be less than the proposed one-mile maximum in areas where views are impeded by dense vegetation or topography.

2012) and STB (March 29, 2012) indicated that they had no objections to the proposed modifications to the APE.

Due to the likelihood of additional changes, ARRC proposed a revised approach to STB and SHPO for dealing with future modifications to the APE. Modifications that are within the overall APE (i.e., including direct and indirect effects) will only result in a change from indirect to direct effects, and a request for modification and approval of a revised APE is not necessary. STB and SHPO agreed that ARRC shall notify STB and SHPO of the change in designation from indirect to direct effects. The Working Group would address the need for cultural resources surveys in any new areas that would have direct effects in accordance with the PA and Working Group Memorandum of Understanding (MOU; Section 5). These areas would require cultural resource surveys if they are in areas of medium or high probability for cultural resources, or selected areas of low probability identified during consultation. In the annual report, ARRC shall provide updated APE maps that incorporate the new areas of direct effects. This annual report shall be provided to Signatories, Invited Signatories, and Concurring Parties to the PA and shall be posted on the project website for review and comment. The current APE is illustrated in Figure 2 of Attachment A.

3.2 Iditarod Dog Sledding Historic District (IDSHD)

The PMRE project bisects the historic and current dog sledding trail system between the Knik Arm coastline and the Susitna River. These trails are used by dog mushers as well as multiple other users, including all-terrain vehicles (ATV), snow machines, horseback riders, hikers, and skiers.

In association with studies conducted under Section 106 and the EIS, Stephen R. Braund & Associates (SRB&A 2010¹⁰) examined a dog sledding cultural landscape in the project area by conducting literature and archival research, site visits, and interviews with people knowledgeable about dog sledding in the project area.

A cultural landscape is a geographic area associated with a historic event, activity, or person or that exhibits other cultural or aesthetic values (SRB&A 2010). Cultural landscapes are generally listed on the National Register of Historic Places (NRHP) as sites or districts. The National Park Service (NPS) recognizes four types of cultural landscapes: 1) historic designed landscapes (e.g., cemeteries, parks, gardens, etc.); 2) historic vernacular landscapes (e.g., IDSHD, rural villages, industrial complexes, agricultural landscapes, etc.); 3) historic sites (e.g., presidential properties, battlefields, etc.); and 4) ethnographic landscapes (e.g., religious sacred sites, massive geological features with cultural significance, etc.). Cultural landscapes are defined by multiple characteristics such as land use, patterns of spatial organization, and circulation networks (i.e., systems of movement such as roads and trails).

The IDSHD is a historic vernacular landscape that illustrates the historic significance of dog sledding in the study area. The IDSHD consists of trails, travel routes, kennels, clubs, roadhouses, and natural features that demonstrate use of natural systems and features, spatial organization, circulation, buildings/structures, and cultural traditions associated with dog sledding. As reported by SRB&A (2010), dog sledders frequently use seismic lines, section lines, power line easements, open wetland areas and frozen rivers and creeks in addition to

¹⁰ SRB&A. 2010. *Port Rail Extension Project Report of 2009 Cultural Resources Fieldwork*. Anchorage, Alaska.

established trails. Trails are not generally identifiable during non-winter months as ground surface and vegetation is protected from permanent damage due to snow cover. Because the trail system is dependent on natural features, trail locations fluctuate from year to year due to changes in the landscape. Therefore, movement of trails to take advantage of landscape conditions from year to year is a characteristic of the IDSHD.

STB supported, and SHPO concurred with, the recommendation and finding (SRB&A 2010) that the IDSHD (ANC-03326/TY0-00203) was eligible for listing in the NRHP under Criterion A at the national level of significance for its association with events that have made a significant contribution to broad patterns of Alaska history, specifically the theme of recreation related to the Iditarod Race and its development (1967-1978). The start of this period marks the inaugural run of the Iditarod Race that traced the route of the historic Iditarod Trail between the Knik and Big Lake areas. The historic Iditarod Trail was designated as a NHT in 1978.

SRB&A (2010) recommended multiple individual trails, buildings/structures, and natural features as contributing elements/features to the IDSHD. The majority of these trails and buildings/structures are located outside of the APE. Recommended contributing trails within the APE include: the Iditarod NHT¹¹, Iditarod Race Trail, United States Geological Survey (USGS) Transmission Line Trail, and Basemap Winter Trails 2¹², 4, and 5 (see Attachment D, Crossing Locations map and APE map series for locations of SRB&A's recommended contributing trails). Not all of these trails are still used for dog sledding. For example, workshop participants stated that Basemap Winter Trail 2 is no longer used for dog sledding; it was located on private/agricultural lands and no longer exists. Other recommended contributing trails in the southern most end of the project are located within the Port MacKenzie District and access/use is restricted due to port security and land ownership constraints. The Project Team proposed one crossing, an oversized culvert for the Figure 8 Lake Loop Trail (Crossing 18; see Figure 1 and Table 4), at the southern end of the project, and participants raised no objections. Additional accommodations for recreational trail users have been proposed since the IDSHD workshops/open house (see Section 4.4).

The Iditarod NHT and Iditarod Race Trail are individual trails in the project area that were specifically referenced by workshop/open house participants as important to the IDSHD and noted for continued use for dog sledding. These trails are necessary to maintain the connectivity of the district, and have separated grade crossings (see Section 4.3 and Table 4 for further discussion of these crossings).

Continued use of the IDSHD for dog sledding is dependent on maintaining access and connectivity across/through the railroad embankment, not on whether a trail is labeled as contributing or non-contributing to the historic district. As workshop participants pointed out, trails of more recent origin currently used by dog mushers are important to connectivity and access, even if they are not contributing elements to the historic district. As discussed in SRB&A (2010), it is the interconnectedness of the trails and easy access that makes the IDSHD unique to other areas of the state where dog sledding occurs. Therefore, following Workshop 1

¹¹ This trail was designated as a National Historic Trail [NHT] in 1978 but has had no determination of eligibility for the NRHP to date.

¹² Based on 2011 consultation, USGS Base Map Winter Trail 2 trail is no longer in use, so the Working Group recommends that it is no longer a contributing element to the IDSHD.

and consultation with the Working Group and SHPO, the focus of mitigation for the IDSHD shifted from addressing impacts to individual trails and other features to addressing the access and connectivity of the IDSHD trail network and related infrastructure through maintaining access and connectivity and addressing safety issues for dog sledding within the IDSHD at crossings and crossing approaches. ARRC has developed multiple commitments to avoid, minimize, or mitigate impacts to the IDSHD from the project (see Section 4.3, Table 3 and Table 4).

3.3 Officially Recognized Trails

Mitigation Measure 92 requires ARRC to report on any officially recognized trails that it proposes to relocate rather than provide grade-separated or at-grade crossings, along with the rationale for the relocations and impacts to trail users if the trails are relocated rather than being equipped with grade-separated crossings. Per the Final EIS, “Where the proposed rail line would cross an officially recognized trail, ARRC has stated it would provide public access by a grade-separated crossing. Alternatively, the trail could be relocated by ARRC to avoid crossing the rail line.” The Project Team has not committed to providing crossings for unofficial trails¹³.

Officially recognized trails in the project area include:

- Big Lake Trail #2 (Crossing 2)
- Big Lake Trail #1 (Crossing 4)
- Houston Lake Loop Trail (Crossing 4)
- Big Lake Trail #5 – Iron Dog Connector Trail (Crossing 5)
- Flat Lake Connector Trail – Iron Dog Trail (Crossing 5)
- Crooked Lake Trail – West Papoose Twins Road (Crossing 7)
- Big Lake Trail #14 – Iditarod Race Trail (Crossing 9)
- Iditarod NHT (Crossing 10)

All officially recognized trails have planned crossing structures with the exception of three trails that are planned to be rerouted under nearby bridges to facilitate a crossing: 1) Big Lake Trail #5 - Iron Dog Connector Trail, 2) Flat Lake Connector - Iron Dog Trail, and 3) the Houston Lake Loop Trail. Further discussion of these reroutes is included in Sections 4.2 and 4.3.

During the IDSHD workshops/open house, participants stated that relocating trails rather than keeping the trails in place and providing each with grade-separated crossings would result in potential impacts to trail users. Of particular concern to trail users was reroutes that would consolidate multiple trails onto one trail and crossing; these types of reroutes were considered to have higher potential for “bottlenecking” trail users, increasing potential for collisions, and creating user conflicts. Participants indicated that impacts could be minimized by improving line

¹³ Per the Final EIS, an unofficial trail is any trail “that is not specifically established within currently adopted plans by ADNR and/or MSB or is established within these plans at the time of construction or ROW conveyance (whichever occurs first), and whose location is not provided for by recorded ROW or easement. ARRC does not propose to provide crossings for unofficial trails. Unofficial trails would be blocked, and ARRC’s trespassing regulations would prohibit the public from crossing of the ROW without first obtaining approval from ARRC.”

of sight at approaches, increasing the radius of curves for approaches and trail relocations, and providing grade-separated crossings with increased horizontal clearance.

ARRC has proposed to grade separate officially recognized trails where possible; however, grade separations are not feasible for all crossings due to terrain, adverse impacts to other environmental resources, or other constraints (see Section 4.2). IDSHD workshops/open house participants stated that they would prefer to have at-grade crossings rather than no crossing at all in cases where grade separation is not feasible.

At-grade crossings will be provided for roads and utility corridors currently crossing the alignment; some of these corridors share the same alignment as officially recognized trails. Pursuant to ROD Mitigation Measures 84D and 92, ARRC is conducting ongoing coordination with recreational trail users, regulatory agencies, landowners, and the STB to comply with STB's requirements for the location, design, and construction of any at-grade rail crossings. Upon acquisition of all project ROW and associated easements, ARRC will submit a final At-Grade Crossing Plan to the STB.

Some of the officially recognized trails still do not have a formal ROW instrument/easement in place despite being included in a local trails plan (e.g., Houston Lake Loop Trail, Big Lake Trail #2, Iron Dog Connector Trail and Flat Lake Connector-Iron Dog Trail). Crossings are contingent on adjacent landowners granting trail easements. The Project Team is working diligently with trail users, property owners and agencies to secure easements or other potential legal instruments for the officially recognized trails crossing the new rail embankment. Negotiations are currently underway with UA and MHLT to secure easements for existing trails on their lands. This effort is ongoing and progress will be reported to user groups and agencies prior to final design and construction. Further discussion of these efforts is included in Section 4.3.

4 Summary of Issues, Outcomes, and Mitigation Commitments

4.1 Participant Comments/Concerns

The Project Team has worked to identify design changes, modifications, and/or refinements to the project to address mushers' and other trail users' concerns and mitigate impacts identified during IDSHD workshops and the MSB Open House. Participant comments/concerns provided at the workshops and open house focused primarily on access, connectivity, and safety issues. Table 3 summarizes comments/concerns raised by participants at the IDSHD-related workshops/meetings. Further information regarding these comments/concerns and resulting ARRC mitigation commitments is included in Section 4.3.

4.2 Constraints

Multiple constraints (see Attachment A, Figure 3) have affected project design including development of avoidance, minimization, or mitigation measures:

- FAA VORTAC¹⁴ radar site construction restrictions

¹⁴ VHF Omnidirectional Range/Tactical Aircraft Control.

- Wetlands impacts (Environmental Protection Agency [EPA] and the U.S. Army Corps of Engineers [Corps])
- Land ownership
- Lack of legal easements for some trails affected by the project

The Project Team has been working with FAA regarding project and construction constraints associated with the FAA VORTAC radar site, which controls the approach for all Anchorage air traffic. FAA defined a three-mile radius where construction restrictions will apply (see Figure 3 in Attachment A). Within this restricted area, the rail embankment and passing trains cannot block the VORTAC electronic signals. FAA denied ARRC's request for an easement across the 160-acre parcel where its VORTAC is located. In light of FAA's decision, a potential modification to the alignment was made to avoid the FAA VORTAC site that included shifting approximately two miles of the alignment to the west of Muleshoe Lake. As originally proposed, the rail alignment was located on the east side of Muleshoe Lake and was going to require a slight realignment to the Houston Lake Loop Trail. The proposed modification would eliminate the need to realign this segment of the Houston Lake Loop Trail and would shift the proposed grade separated crossing of the Houston Lake Loop Trail (Crossing 4) approximately 420 feet north of the previous location. The currently proposed alignment is illustrated on Figure 1 in Attachment A. The Project Team will continue to work with FAA regarding design needs within the three mile radius where construction restrictions apply (see Attachment A, Figure 3), and will report any significant design changes to consulting parties.

Wetland complexes between Crossings 4 and 6 have restricted the locations of crossings (see Attachment A, Figure 3). In consultation with the Project Team, the Corps and EPA requested that there be no increases in the project footprint in wetlands areas to accommodate a widened embankment area. As a result, the Project Team has worked to keep the rail embankment as low as possible to minimize impact in wetlands areas. In the case of the Iron Dog Connector Trail (an officially recognized trail), adding a grade-separated crossing would require raising the embankment high enough to provide 12' to 14' of clearance for trail users and would increase the fill footprint of the embankment over several miles. Adding an at-grade crossing would increase the impact to wetlands as the crossing would require additional embankment at the approaches to the proposed railroad crossing.

Land ownership and lack of legal easements are also challenges. The Project Team must consider property ownership when planning crossing locations, so as to not promote trespass or provide a crossing that may not be usable into the foreseeable future. This is a particular concern between Crossings 1 and 3 and Crossings 7 and 10 (see Attachment A, Figure 3). The MSB is currently in discussions with UA and MHLT to attempt to establish easements for some of the currently used trails in the project area (e.g., the Iditarod Race Trail). See Section 4.3 for further discussion.

4.3 Implementation Measures based on Workshops/Meetings

The Project Team has tried to strike a reasonable balance between the needs of trail users, obligations to property owners and State and Federal agencies, and safety considerations. Based on comments received at the IDSHD workshops and MSB Open House, participants seemed to agree that the Project Team had made good progress toward resolving the reported issues and that these proposed measures would avoid, minimize, or mitigate adverse effects on the IDSHD.

These comments received during the workshops, and measures to address them, are summarized in Table 3 (Summary of IDSHD Workshop Comments/Issues and ARRC Mitigation Commitments), and crossing details are included in Table 4 (Trail/Crossing Summary). Identified issues and ARRC commitments are discussed further in the following section.

Several comments/issues were resolved during the IDSHD workshops and MSB Open House. They require no further implementation and/or commitment and are not discussed further in this *Implementation Plan*. These comments/issues are summarized in Table 3 and include:

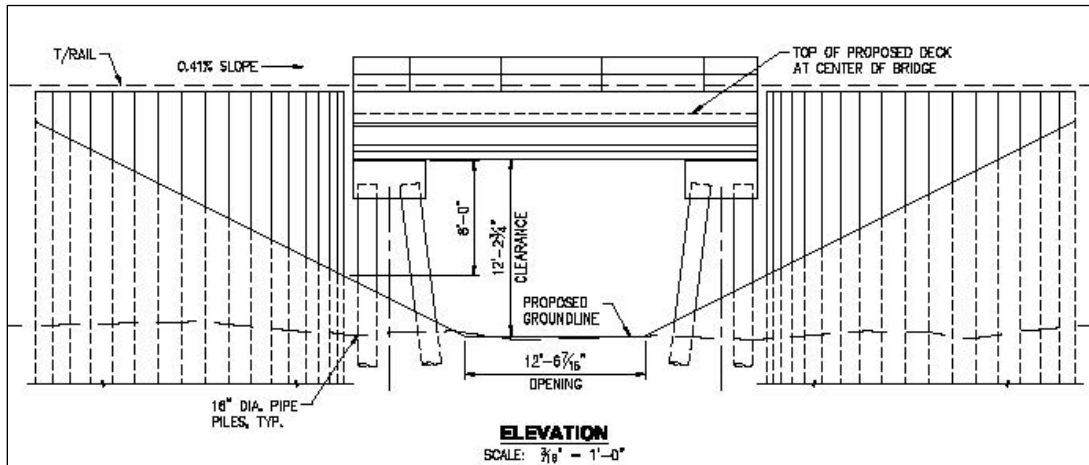
- Providing participants with a constraints map illustrating where crossings cannot be located (Issue 6);
- Adding a crossing for the trail between current Crossings 12 and 13 (Issue 13);
- Holding a meeting with other trail users and postponing Workshop 3 until after that meeting (Issue 17);
- Providing better/more detailed information on each crossing for the larger trail user meeting (Issue 18); and
- Explaining the process for how the final decision will be made on the crossings (Issue 20).

The following discussion summarizes the key commitments made by the Project Team in response to comments/issues raised by workshop participants. Most of these commitments will be implemented during final design and construction, or as indicated in Table 3. The exhibits/figures provided below are based on 60% design and are not final, so some refinements may occur. Changes to crossings and reroutes from what is described/illustrated below will be reported to PA Signatories, Invited Signatories, and other interested consulting parties and posted on the project website.

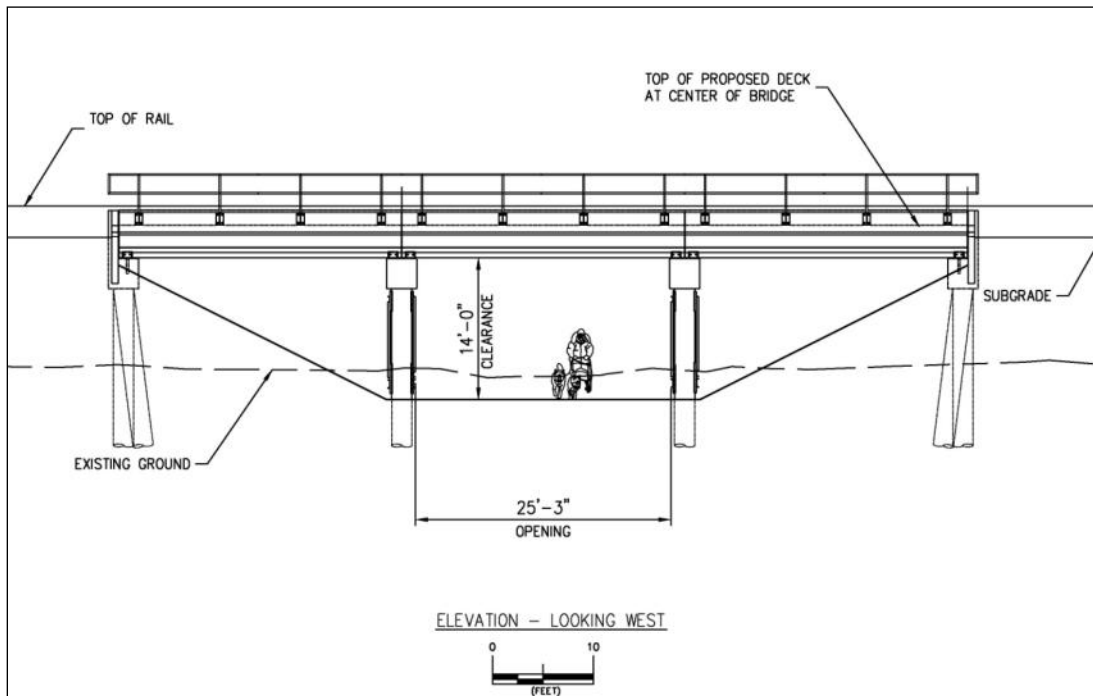
Redesign bridges/crossings with the vertical clearance increased to a minimum of 14' whenever possible (Issue 1)

Workshop participants stated that the height (vertical clearance) of crossings needs to be increased to more than 12' to account for snow depth, accommodate equipment for grooming of trails, and enhance safety. The initial clearance presented at Workshop 1 was as low as 10' for some crossings. The Project Team committed to redesigning bridges/crossings with the vertical clearance increased to a minimum of 14', whenever possible. Vertical clearances will range from 12' to over 18' (see Table 4). Only two crossing structures, located south of the Agricultural District, will have a vertical clearance less than 14'. Baker Farm Bridge (Crossing 16) will be a three-span bridge providing between approximately 12' vertical and 25' horizontal clearance. This crossing is adjacent to the Baker Farm Road at-grade crossing (Crossing 17), which provides an alternative crossing option in the vicinity. The Figure 8 Lake Loop trailhead crossing (Crossing 18) will be accommodated by a 19' diameter plate pipe, providing between approximately 9' and 14' vertical by 16' horizontal clearance. A bridge crossing in this location is not practicable due to the poor soil conditions and high-railroad embankment through the area. Alternative access for over-height vehicles is provided by the access road from Lu Young Lane, south of the Bulk Material Bi-modal Facility (BMBF).

Exhibit 1 shows a comparison of the Iditarod NHT crossing (Crossing 10) proposed at Workshop 1 and the currently proposed crossing that has been refined based on comments from trail users. The vertical clearance was increased from approximately 12' to 14'.



June 2011 Planned Crossing



December 2011 Planned Crossing

Exhibit 1: Iditarod NHT crossing design before and after the IDSHD Workshops

Develop standards for sight distance needs and crossing approaches to accommodate a 100'-long vehicle/dog team (minimum 60' turn radius; Issue 2)

As stated by workshop participants, in reference to the rerouted trails (specifically the separated-grade crossing at Milepost (MP) K22.8 Tributary of the Little Susitna River [Crossing 5]), the length of a sled dog team with 16 to 20 dogs (approximately 85') needs to be considered during design of trail approaches to crossings to ensure curves are not too tight. Exhibit 2 illustrates typical design changes to approaches to address line of sight issues for trail reroutes. The Project Team worked with Sustainable Design Group to develop standards for sight distance needs and crossing approaches. A 100' long vehicle/dog team requires a minimum 60' turn radius. The design standards for trail approaches to crossings include gentle curves with turn radii between 75' and 90', which will allow for a 100' long dog team to turn and safely pass through the structure while allowing adequate line of sight for trail users prior to passage.

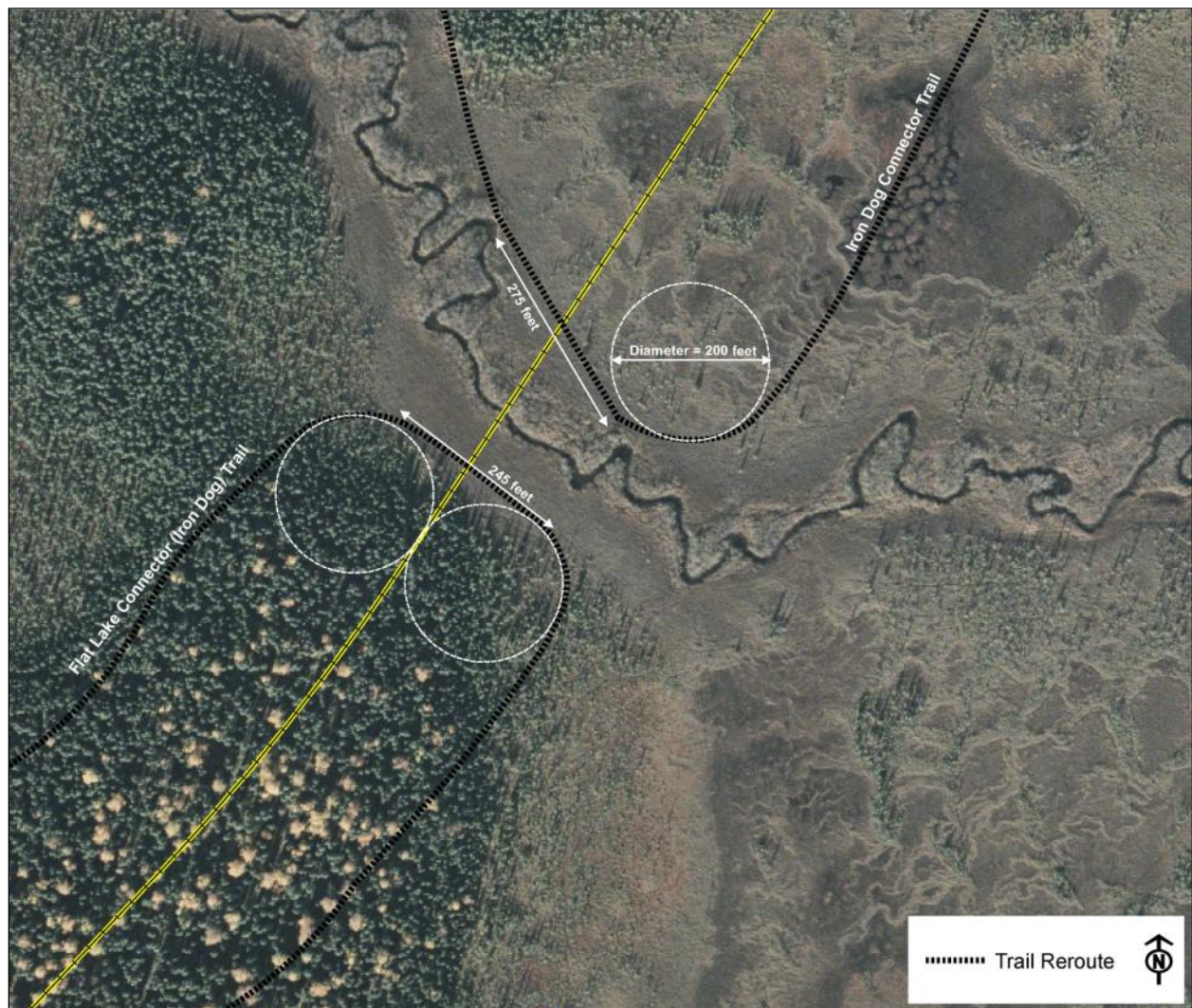


Exhibit 2: Approach example

Redesign bridges/crossings with minimum of three spans to provide a minimum of 20' of horizontal clearance and provide relatively straight trail approaches (Issue 3)

As presented at Workshop 1, some proposed crossings were single span bridges, and participants stated that these types of crossings do not provide adequate visibility to see if anything is approaching from the other direction. The participants recommended that the length of these crossings be increased and trail approaches to crossings be designed to allow adequate line-of-sight. The Project Team eliminated the 28' single-span concrete ballast deck (CBD) bridges that were originally proposed for some trails. Bridges are now a minimum of three spans, and the spans designated specifically for existing and or rerouted trails will generally provide a minimum of 20' of horizontal clearance (Table 4). Adequate visibility/line-of sight will also be provided with relatively straight trail approaches to these longer bridges with higher vertical clearance (minimum of 14' whenever possible). The December 2011 design for the Iditarod NHT crossing (Crossing 10) is typical of design changes undertaken by the Project Team to address workshop participants' concerns (see Exhibit 1). Exhibit 2 illustrates typical design changes to approaches to address line of sight issues for trail reroutes.

Consider future development and population growth during project design (Issue 4)

Participants commented that planning for at-grade road crossings (e.g., West Susitna Parkway and Ayrshire Avenue) should take population growth and resulting development into consideration, as conflicts between users could increase. They were concerned that at-grade trail crossings could potentially be turned into road crossings as growth and development increases. The Project Team confirmed that designs for trail crossings are not adequate for roadways, and trail crossings will not be turned into road crossings. The project includes sufficient road crossings to address needs identified in the MSB Long Range Transportation Plan (LRTP), and future growth is being considered during design and ROW acquisition for roads such as West Susitna Parkway and Ayrshire Avenue. The Project Team developed and will implement design standards for trail crossings that are separated from the roads at at-grade crossings.

Easements do not exist but are needed for some trails (Issue 5)

Participants noted that easements are not currently in place for some trails that they regularly use. These easements are needed to avoid possible trespass situations and to ensure that as population increases, trails are not sold into private ownership/development. In situations where ARRC proposes a trail crossing at a location where a legal trail easement does not currently exist, the MSB is requesting easements from adjoining landowners to ensure that trail use associated with the crossing structure is authorized and that future trespass is avoided. MSB Community Development and Land Management continues to work with trail users, agencies, and land owners to obtain easements for the Iditarod Race Trail, the Houston Lake Loop Trail and Big Lake Trail #2. MSB is also working with agencies to try to secure easements or other legal instrument for recognized trails that are proposed to be rerouted as part of the project including the Iron Dog Connector Trail and Flat Lake Connector (Iron Dog) Trail. If MSB is unsuccessful in acquiring legal easements, trails will be relocated to an area where an easement can be obtained such as along section line easements or re-routed through the nearest MSB-owned property in an effort to maintain existing trail connectivity and provide safe, legal crossing opportunities along the new rail line.

Negotiations with UA and MHLT are ongoing and the Project Team has worked with these land owners to minimize trail reroute impacts while also emphasizing that trail easements are of the

upmost importance to preserve access. The Project Team is currently in negotiations with UA to obtain an easement for the Iditarod Race Trail. This process will take several months and requires MSB assembly approval (anticipated to occur at the end of 2012). The Project Team has been working closely with MHLT on the relocation of trails and easements. No estimate of time is currently known for this process.

Provide additional crossings between Crossings 2 and 10 to maintain connectivity (Issue 7)

Limiting the number of crossings and relocating and/or combining trails in the area between Crossings 2 and 10 may “bottleneck” multiple user groups onto fewer trails, thereby increasing the potential for collisions and user conflicts (e.g., between snow machiners or other users and mushers). The Project Team has tried to strike a reasonable balance between the needs of trail users, our obligations to property owners and State and Federal agencies, and safety considerations. We have investigated inclusion of additional grade-separated crossings between Crossings 2 and 10, and have been working with user groups, agencies, and landowners to find a solution.

Safety is a significant concern to both the Project Team and IDSHD workshop/meeting participants and is a constraint for crossing locations. Unfortunately, the area between Crossings 2 and 10 does not present good opportunities for separated grade crossing structures (e.g., bridges) because of safety concerns (e.g., visibility issues caused by topography and vegetation), regulatory issues related to wetlands impacts, design issues associated with a high water table in the area, property ownership, existing property/easement constraints, and construction restrictions associated with the FAA VORTAC radar site (see Section 4.2).

Much of the terrain in the area between Crossings 2 and 10 is undulating with patches of trees making it difficult for users to see an oncoming train. A train cannot stop quickly, and it generally takes one mile or more for a train to come to a stop. Sight distance for train operators is also a potential safety issue in areas where a curve in the tracks, dense vegetation, and topography may affect visibility. In addition, some users may be wearing helmets and listening to headphones while traveling in the area, or be operating loud vehicles, thus impeding their ability to hear a train coming.

The Project Team will continue to investigate inclusion of additional crossings between Crossings 2 and 10. At this time, however, the Project Team believes that we have identified all possible crossings in this area and we make no commitments regarding additional crossings between Crossings 2 and 10. Two crossings have been added between Crossing 11 (Outflow of Diamond Lake) and Crossing 16 (Baker Farm Bridge) to improve connectivity and safety in that area (see Section 4.4).

Provide a crossing for the Iron Dog Connector Trail and the Flat Lake Connector Trail (Issues 8 and 9)

Participants requested that the Project include crossings for the Iron Dog Connector and Flat Lake Connector trails. The Iron Dog Connector Trail (Big Lake Trail #5) is identified in MSB trail plans as a winter use only trail that traverses wetlands and lakes. Due to safety concerns, wetland and regulatory concerns, tree cover, and topography, a crossing is not a good option at its current location (see Section 4.2).

The Flat Lake Connector Trail (official Iron Dog trail) is a well-established trail with a legal easement that needs an at-grade crossing and other improvements, such as cutting trees at the

crossing to allow a wider field of view for approaches. A minimum height of 14' to allow for snow depth, accommodate equipment for grooming of trails, and enhance safety cannot be achieved at this location; no more than 10' of clearance is possible without interfering with the shallow underlying groundwater table. An at-grade crossing cannot be used at this location due to safety concerns; the available line of sight is minimal due to area topography even if trees are cleared.

To meet trail user crossing needs and allow for a safe crossing, the Project Team proposes to reroute the Iron Dog Connector and Flat Lake Connector trails to a multi-use crossing structure at MP K 22.8 over an unnamed tributary to the Susitna River (Crossing 5; Figure 1). This five-span bridge will have approximately 25' of horizontal clearance for three spans and a minimum of 14' of vertical clearance (Exhibit 3).

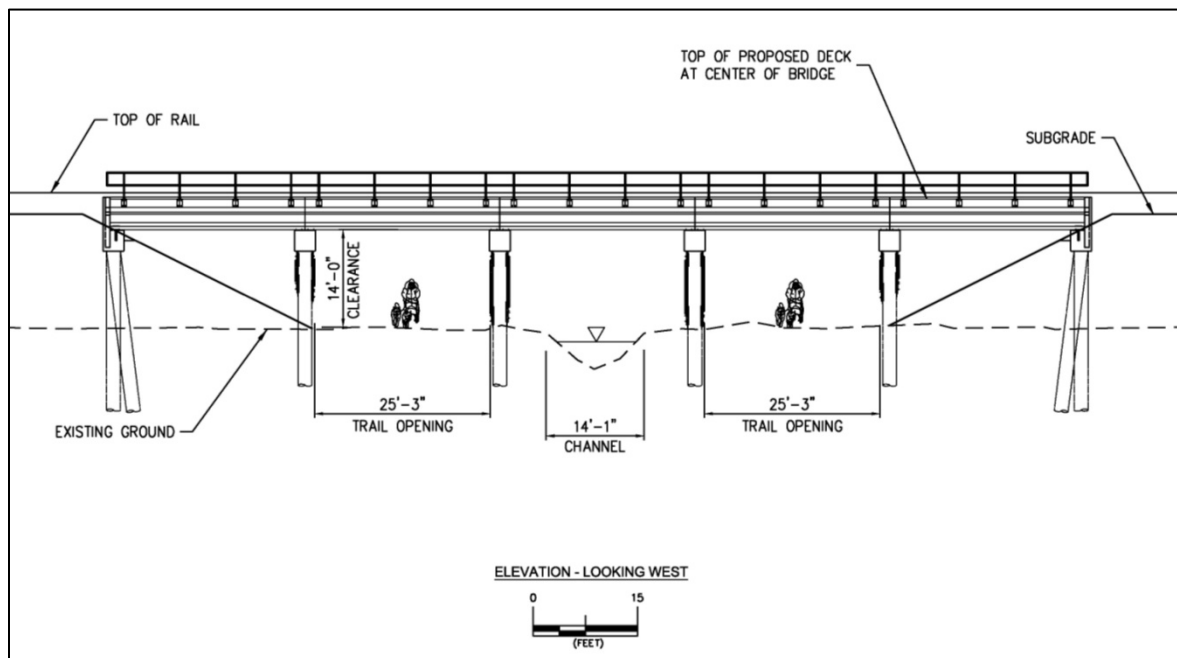


Exhibit 3: Crossing 5 profile view

The design of the reroutes will allow for sufficient line of sight for all users and traffic will be accommodated by two parallel trails, one on each side of the creek. The Iron Dog Connector trail will be rerouted under the northern span of the bridge and will be reconnected with the Houston Lake Loop Trail north of the rail embankment (Exhibit 4). The MSB worked with the Iron Dog Race Director on the Iron Dog Connector Trail reroute to Crossing 5. The MSB will work with the Race Director and/or Race officials to provide adequate safety coverage at this location during races.

The Flat Lake Connector trail will be routed under the southern span and will be reconnected with the existing trails west of the rail embankment (Exhibit 4). MHLT previously issued a six year revocable license for the Flat Lake Connector Trail. MSB is currently working with the MHLT to try and establish legal easements for both of these trails and their planned reroutes. We are confident that the proposed reroutes will address the needs and concerns of trail users and

the MHLT. If MSB can not acquire an easement for the Iron Dog Connector and Flat Lake Connector trail reroutes, the Project Team will notify workshop participants and provide a revised proposal for continued access and connectivity prior to final design and construction.

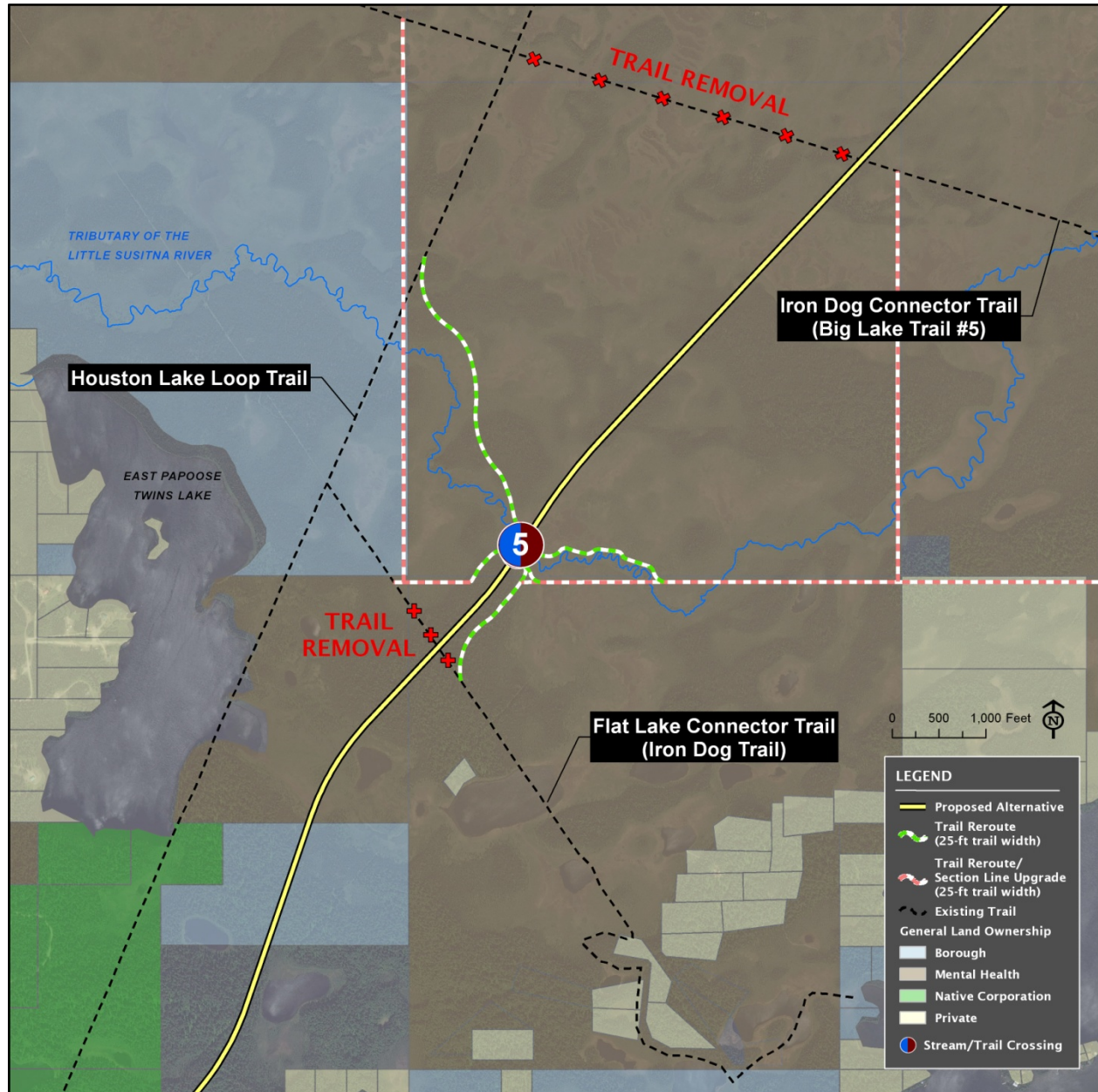


Exhibit 4: Proposed Iron Dog and Flat Lake Connector Trail Reroutes and Crossing (Crossing 5)¹⁵

¹⁵ This exhibit does not reflect all the trail reroutes in the area; it is focused on the reroutes to Crossing 5.

Incorporate safety considerations into design for Crossing 5 (MP K 22.8 Unnamed Tributary to the Little Susitna River; Issue 10)

All officially recognized trails in the APE have planned crossing structures with the exception of three trails that are planned to be rerouted under nearby bridges: 1) Big Lake Trail #5 - Iron Dog Connector Trail, 2) Flat Lake Connector - Iron Dog Trail, and 3) the Houston Lake Loop Trail. These trails will be rerouted to Crossing 5 (MP K 22.8, Unnamed Tributary to the Little Susitna River; see Exhibit 4).

The Project Team has developed design standards for Crossing 5 and these reroutes to provide safe crossings (e.g., increased horizontal and vertical clearance for better line of sight). Crossing 5 has been modified since Workshop 1 based on input from participants. The original design for Crossing 5 was a three-span bridge with 12'-7.5" of vertical clearance, two spans with 14' horizontal clearance, and a center span with over 25' of horizontal clearance. The design presented in the draft *Implementation Plan* for Crossing 5 included vertical clearances of more than 17' and horizontal clearances of more than 25'. However, the current vertical clearance will be a minimum of 14' to reduce wetland impacts. The structure will accommodate a trail on both the north and south side of the creek, each with a horizontal clearance of more than 25'. Exhibit 3 shows the most recent proposed design for Crossing 5.

The Project Team is committed to continuing access and connectivity in association with these trails by obtaining easements for the reroutes. The design of the reroutes will allow for sufficient line of sight for all users and traffic will be accommodated by two parallel trails, one on each side of the creek. The trail groomer will be able to maintain access on the north and south spans of this crossing structure via existing trail connectivity. Crossing approaches will follow standards for sight distance needs that will accommodate a 100' long vehicle/dog team (i.e., turn radii between 75' and 90'; see Exhibit 2). Trails will be aligned to provide increased site distance. Trail embankments will be designed to minimize impacts from overflow.

Provide crossing for the Iditarod Race Trail; obtain an easement from the University of Alaska (Issue 11)

Workshop participants stated that the Project needs to provide a crossing for the Iditarod Race Trail (Crossing 9) and obtain an easement from the University of Alaska for this trail should one not currently exist. It was learned during the course of the workshops/meeting that an easement does not currently exist for the Iditarod Race Trail. This trail has reportedly hosted 20 Iditarod races and is used more frequently/regularly than the Iditarod NHT. Participants indicated that a separated grade crossing (bridge) is preferred, but if a bridge is not possible, an at-grade crossing would be better than no crossing at all.

Approaches to a crossing for the Iditarod Race Trail would be on UA land. Since no easement currently exists at this location, the MSB continues to work with UA to secure an easement. This issue is anticipated to be resolved by the end of 2012. The proposed Iditarod Race Trail crossing (Crossing 9) would be a typical three-span bridge with a minimum 14' vertical clearance, and approximately 25' of horizontal clearance in the center span (see Exhibit 1 as an example of a typical three-span bridge). This crossing will involve excavation and grading of the trail to obtain 14-feet of vertical clearance and 20' of horizontal clearance at the current crossing location. Approach improvements would include widening the trail in the vicinity of the crossing.

The Project Team is committed to continuing access and connectivity in association with the Iditarod Race Trail, a trail that IDSHD workshop/open house participants indicated was important to the IDSHD. If negotiations with UA to secure an easement are unsuccessful, a crossing cannot be provided for the Iditarod Race Trail at its current location as it would encourage trespassing on UA property. The Iditarod Race Trail would instead be rerouted to the Iditarod NHT, which would be upgraded/improved to accommodate the potential increase in users (Exhibit 5).

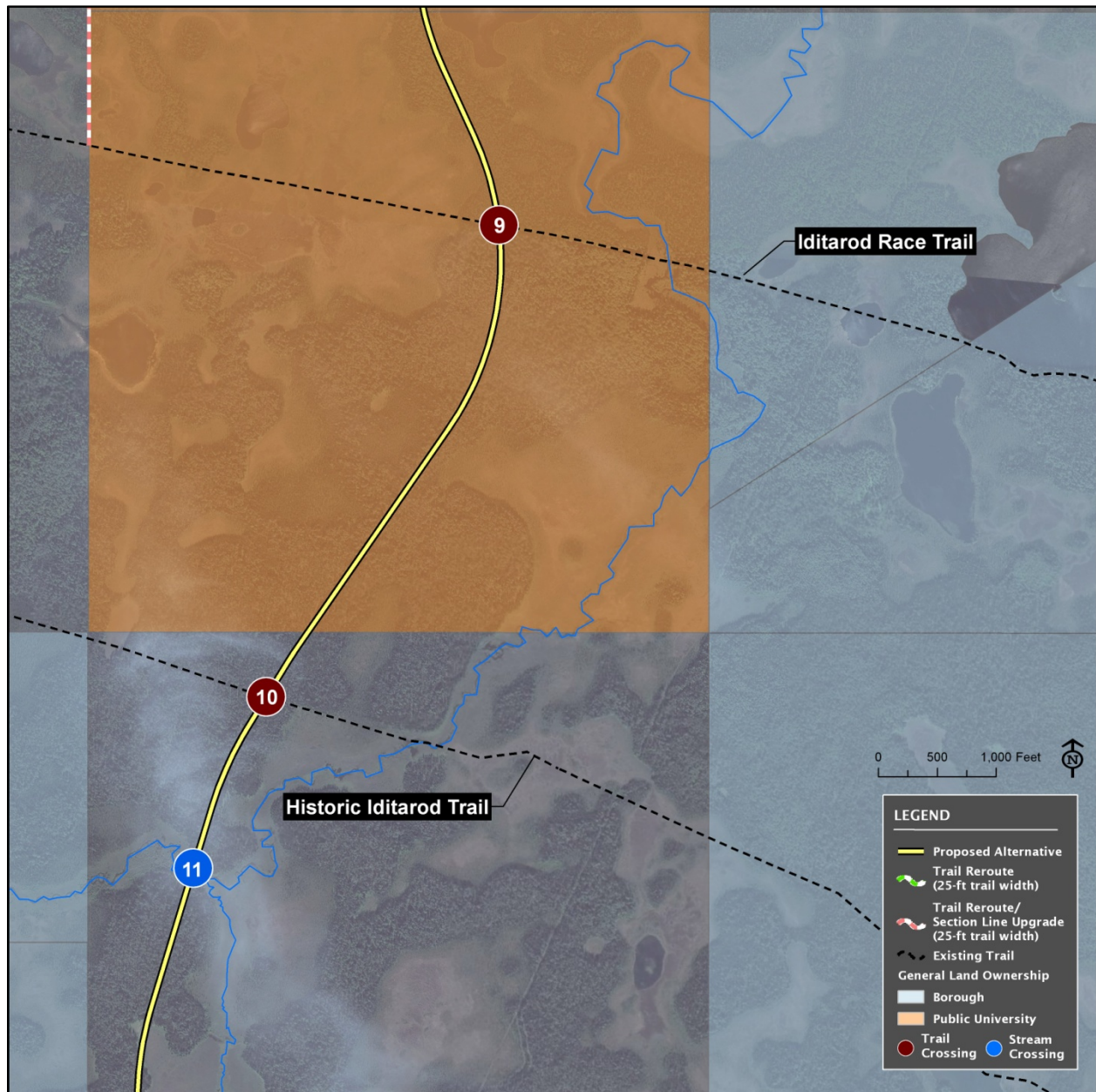


Exhibit 5: Possible Iditarod Race Trail Reroute and Crossings

Provide separated grade crossing (bridge) and trail improvements for the Iditarod NHT (Crossing 10; Issue 12)

IDSHD workshop participants stated that the project needs to provide a separated grade crossing (bridge) and trail improvements for the Iditarod NHT (Crossing 10). The Iditarod NHT is reportedly not used as frequently as the Iditarod Race Trail and needs improvement if it is to be regularly used. According to participants, it is currently too narrow for current and potential increased use and the portion of the trail west of the crossing location near the Little Susitna River washes out and is in ill repair.

The Project Team will provide a separated grade crossing for the Iditarod NHT (Table 4 and Attachment A, Figure 1). Although the original crossing designs for this trail included a single span crossing with 12' of vertical and 14' of horizontal clearance, the crossing structure was redesigned to include a three-span bridge with 14' of vertical clearance and over 25' of horizontal clearance (see Exhibit 1 for a comparison of early and current crossing design). Although only the central span of the bridge will be passable for trail users, the north and south spans increase visibility for potential oncoming traffic. The Iditarod NHT will be improved where it passes beneath the rail embankment using standards for sight distance needs and crossing approaches to accommodate a 100' long vehicle/dog team (i.e., turn radii between 75' and 90'; see Exhibit 5).

Provide a trail(s) along one or both sides of the proposed ROW to maintain connectivity (Issue 14)

Participants stated during the IDSHD workshops/meeting that the project should include a north-south trail(s) along one or both sides of the proposed ROW to help maintain connectivity. They indicated that even if there is not a dedicated trail, people would still likely travel along this area.

The Project Team evaluated participants' recommendation for a north-south trail along one or both sides of the proposed ROW to help maintain connectivity. Trail reroutes, enhanced crossing structures and strategies to maintain connectivity in a safe manner are all measures the Project Team has and continues to work toward as this project moves forward. The proposed railroad alignment is orientated predominately north-south, and most of the trails identified both in the Final EIS and IDSHD workshops that provide north-south movement will remain intact. Providing additional north-south corridors along one or both sides of the rail line has many challenges such as FAA VORTAC issues, safety concerns, wetland and regulatory concerns, land ownership, tree cover, topography and cost of constructing additional bridge structures (see Section 4.2). Based upon current north-south connectivity (Attachment A, Figure 4) and the issues identified above, a new trail(s) paralleling the proposed ROW for the project is not planned.

The existing trail system west of the proposed rail corridor provides a north-south corridor (Attachment A, Figure 4). However, one area of concern for north-south connectivity has been identified between Crossings 7 and 10 (Exhibit 6). This area demonstrates the biggest gap in connectivity and is owned primarily by UA. The Project Team has developed an alternative corridor for north-south travel in this area that may offer a solution for trail users and property owners (see Exhibit 6 and Attachment A, Figure 4). We will continue to work with local trails groups/users, regulatory agencies, land owners and other interested parties to maintain connectivity in the IDSHD.

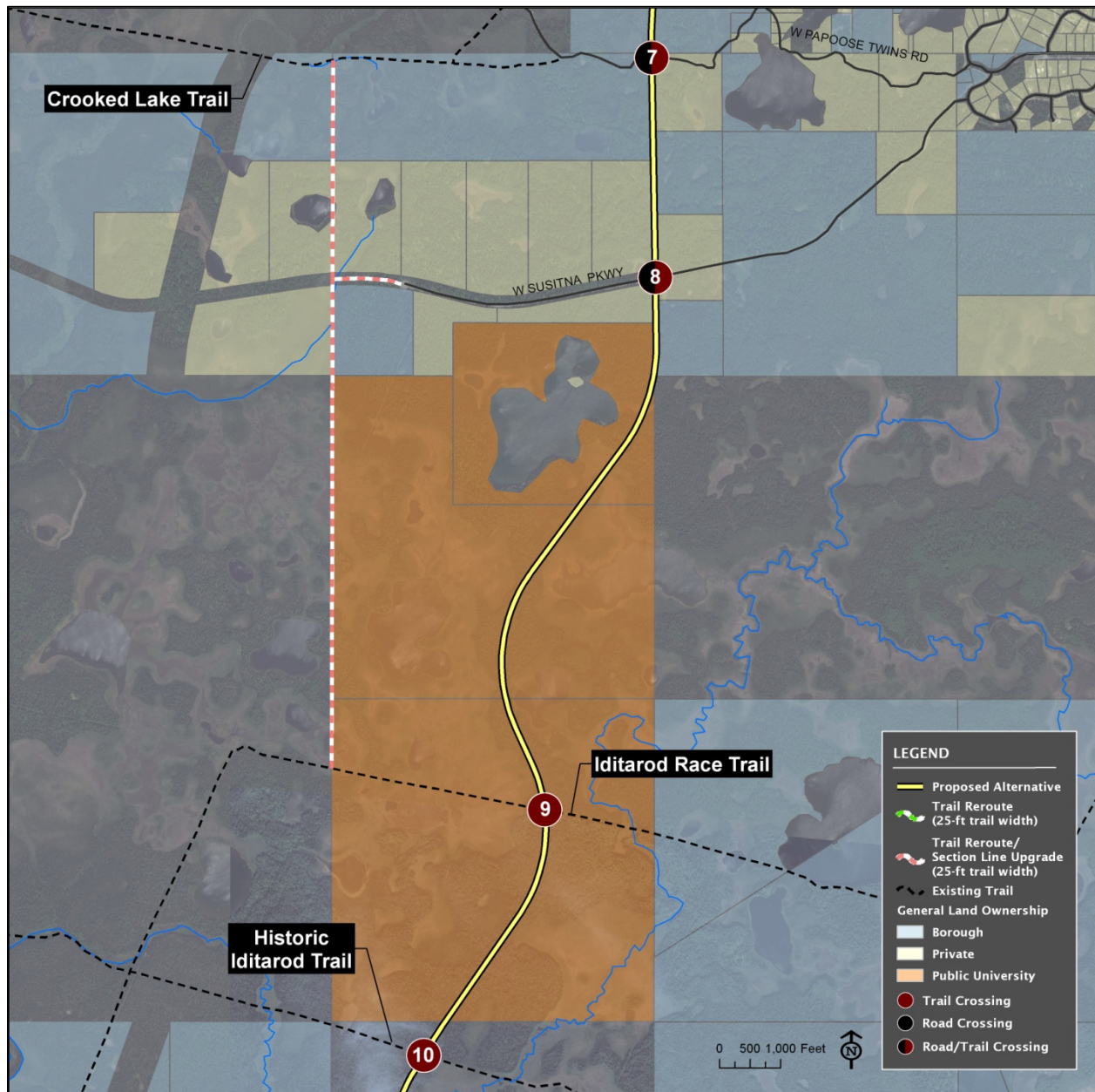


Exhibit 6: Connectivity between Crossings 7 and 10

Provide adequate signage to warn trail users (Issue 15)

Participants requested use of adequate signage to warn trail users. They suggested the Project Team consider using standard snow machine/dog sledding trail signage as seen on Alaska State Parks Snowmobile Trail Advisory Committee (SnoTRAC) website.

The Project Team has developed design standards for signage and kiosks to aid trail users. Appropriate signage would be placed at key points on trails, trail reroutes, and at crossings and could include: trail direction (e.g., North/South arrows), “Caution - Dog Teams on Trail,” “High

Traffic Area,” “Clearance 14’,” “Slow – Keep Right,” “Trail Closed Ahead,” or “Slow – Trail Rerouted.”

Examples of signage are provided in Exhibit 7, and are posted on the project website (<http://www.portmacrail.com/library.html>). To address user concerns, the Project Team will develop signage that is generally consistent with the Alaska State Parks SnoTRAC guidelines.

Kiosks with trail maps will be placed at key locations and will aid trail users by identifying trail reroutes and showing available trail connections. An example of a kiosk located on the Willow trails system is illustrated in Exhibit 8. A proposed design for the kiosks is illustrated in Exhibit 9.



Exhibit 7: Signage examples presented at the MSB Trail User Open House (10/27/11)



Exhibit 8: Willow Trail System Kiosk

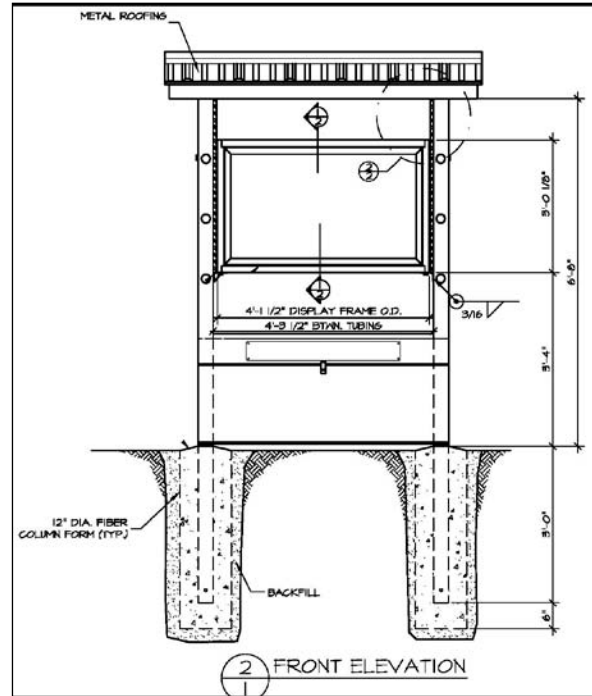


Exhibit 9: Kiosk schematic (Department of Natural Resources)

Consider creating a special use district (SPUD) or formalizing designation of the IDSHD for the NRHP (Issue 16)

IDSHD workshop participants asked the Project Team if the IDSHD would work the same way as the Knik Sled Dog and Recreation Special Land Use District (SPUD) in the MSB. Participants wanted to know if creating a SPUD for the IDSHD area would require future development in the area to go through a formal review process similar to what is required under Section 106 of the NHPA. Participants asked about delineating an IDSHD SPUD similar to the Knik SPUD to create a formal procedure/process for review of projects planned in the IDSHD area and/or to solidify/formalize designation of the IDSHD for the NRHP.

The Knik SPUD was implemented to preserve and protect the existing community of Knik and the homestead lifestyle (includes outdoor, historical, traditional recreational and agricultural uses), protect legal trails, and to provide for planning and growth in the Knik area. The Knik SPUD ordinance implements land use regulations to ensure compatibility between various land uses and encourage developers to recognize and dedicate legal trail ROWs where appropriate. For example, developers are required to identify legal and known trails that will be impacted by their project and work with MSB and the community to protect or relocate those trails. Any new SPUD or expansion of an existing SPUD would have to be initiated by a Community Council and approved by the MSB Assembly.

The IDSHD was found eligible for the NRHP as a result of Section 106 (NHPA) review carried out as part of the National Environmental Policy Act (NEPA) process (see Section 3.2). A NRHP nomination is currently underway for the Iditarod NHT which may include the portion of the trail in the project area. Development using Federal funds or requiring a Federal permit

and/or oversight would require potential developers to go through the Section 106 review process, which includes identifying historic properties (i.e., cultural resources eligible for the NRHP) in the project area, assessing effects to historic properties from the project, and resolving adverse affects. Consultation (i.e., seeking, discussing, and considering the views of interested parties, and seeking agreement when feasible) occurs at all stages of the process. As the IDSHD has been found eligible for the NRHP, Federal agencies would be required to consider the impact of any projects in the area on the IDSHD and avoid, minimize or mitigate any potential adverse effects. Listing and/or nomination of the IDSHD for the NRHP would provide no additional protection or review requirements than are currently in place.

Consultation with SHPO identified the need for a clearly defined IDSHD boundary and guidelines for identifying contributing elements to the IDSHD to facilitate Section 106 consultation for entities considering future development. As currently defined, the IDSHD presents challenges for future undertakings in the general project area. ARRC, in consultation with SHPO and the Working Group, will address these challenges by preparing a separate report that refines the boundaries of the IDSHD, focusing on areas that best retain features representative of the IDSHD, and developing guidance for identifying and documenting property types that could be contributing elements. The draft report will include:

- Brief overview/description of the IDSHD (e.g., name, site number, general location/setting, ownership, function/use, types of associated resources, period of significance, area of significance);
- Summary of consultation and studies done to date regarding the IDSHD;
- Brief overview of the historic context (based on SRB&A 2010) – what did the district look like/use during its period of significance (includes maps and photographs as appropriate);
- Explanation of why/how the district is significant/eligible for the NRHP;
- Discussion of the features that a contributing element to the district would have (e.g., what types of features, physical characteristics of these features that provide association with the district, important aspects of integrity needed to maintain association with the district);
- Identification of district boundaries (e.g., method for identifying the boundary, description of the boundary, justification for the boundary, maps); and
- Summary form that includes the essential elements of NRHP nomination form 10-900.

The draft report/form will be submitted to STB and SHPO for review and comment within one year of finalizing the *Implementation Plan*. Following a 30-day review and comment period, ARRC will address comments received as appropriate and submit a final report/form. Interested consulting parties will be notified that the final report is available and it will be posted on the project website.

Ensure that trails in the MSB trails plan have continued connectivity (Issue 19)

Participants noted during the IDSHD workshops/meeting that when the project was in the earlier phases of the EIS, the Project Team stated that trails in the MSB trails plan would have continued connectivity. Participants questioned if this was still the case.

Although certain east-west trails through the area will change, east-west connectivity will be maintained. The Project Team has been working with various trail user groups to identify and address access/connectivity concerns. We believe we have addressed the major concerns to insure continued access for mushers as well as other users, consistent with the need to maintain connectivity across the rail corridor in the IDSHD. In fact, the project will enhance connectivity by resolving multiple ROW issues on existing trails, ensuring that they will be maintained for the long-term.

As discussed in Section 3.3, the Project Team has committed to providing crossings where the proposed rail line would cross an officially recognized trail or relocate officially recognized trails that could not be provided with crossings. The Project Team has maintained throughout the EIS process that we will not provide crossings for “unofficial trails.” The Project Team has stated in the IDSHD workshops/meeting that trails that cannot be maintained in their current location will be rerouted. If there is a legal easement for the trail (e.g., the Iditarod NHT), the trail location will be maintained and a crossing will be provided in its current location if possible. In addition, the Project Team will work with regulatory agencies and or property owners to attempt to obtain similar legal access and easements for any rerouted trail (e.g., the Flat Lake Connector and Iron Dog Connector trails).

Consider potential conflicts with moose during project design (Issue 21)

Workshop and Open House participants stated that moose will also use the project crossings, and that funneling wildlife and trail users onto fewer crossings/trails would increase conflicts between users and wildlife. Moose often go up and over the railroad embankment, although they may also use the crossings. On many trails, moose are unlikely to be present due to the presence of human users. The Project Team has developed design standards that will minimize the potential for trail users and wildlife such as longer bridges and larger bridge openings to improve visibility. The Project Team believes that longer bridges, with wider horizontal and vertical openings, will improve visibility for trail users and reduce the potential for wildlife conflicts. Moose conflicts on the existing trail system are not common and the number of moose encounters with dog teams, snowmachines or other user groups is not expected to increase as a result of this project. The length and width of the crossing structures provides ample space for moose and other wildlife to move away from the rail embankment.

4.4 Additional Implementation Measures

Following the IDSHD workshops/meetings and submittal of the draft Implementation Plan to consulting parties, there have been modifications to the proposed project design. Currently there are 18 planned crossing locations identified for the project (Figure 1). While the majority of these crossings are designed to accommodate existing or relocated trails, three of the crossings (Crossings 6, 11 and 12) are designated as stream crossings and are not connected to the established trail system. However, these crossings have been designed to meet the height and width requirements to support multiple-user groups in the project area (Table 4). Additional trail relocations and crossings are summarized below.

Additional proposed trail/crossing relocations

Big Lake Trail #2 is located in an existing Matanuska Electric Association (MEA) power line license on Knikatnu Corporation lands¹⁶. To facilitate continued connectivity/access for this trail and avoid conflicts between trail users, the land owner and MEA, the Project Team has proposed rerouting Big Lake Trail #2 to a section line easement adjacent to the existing trail. This rerouted trail would use Crossing 2, an at-grade crossing, which would be moved west of its current location to the section line easement where it crosses the proposed rail alignment (see Exhibit 10 and Table 4). Grade separation is not feasible at this location due to the relatively short distance to the Millers Reach Road at-grade crossing (Crossing 1) and the need for the MEA power lines to cross.

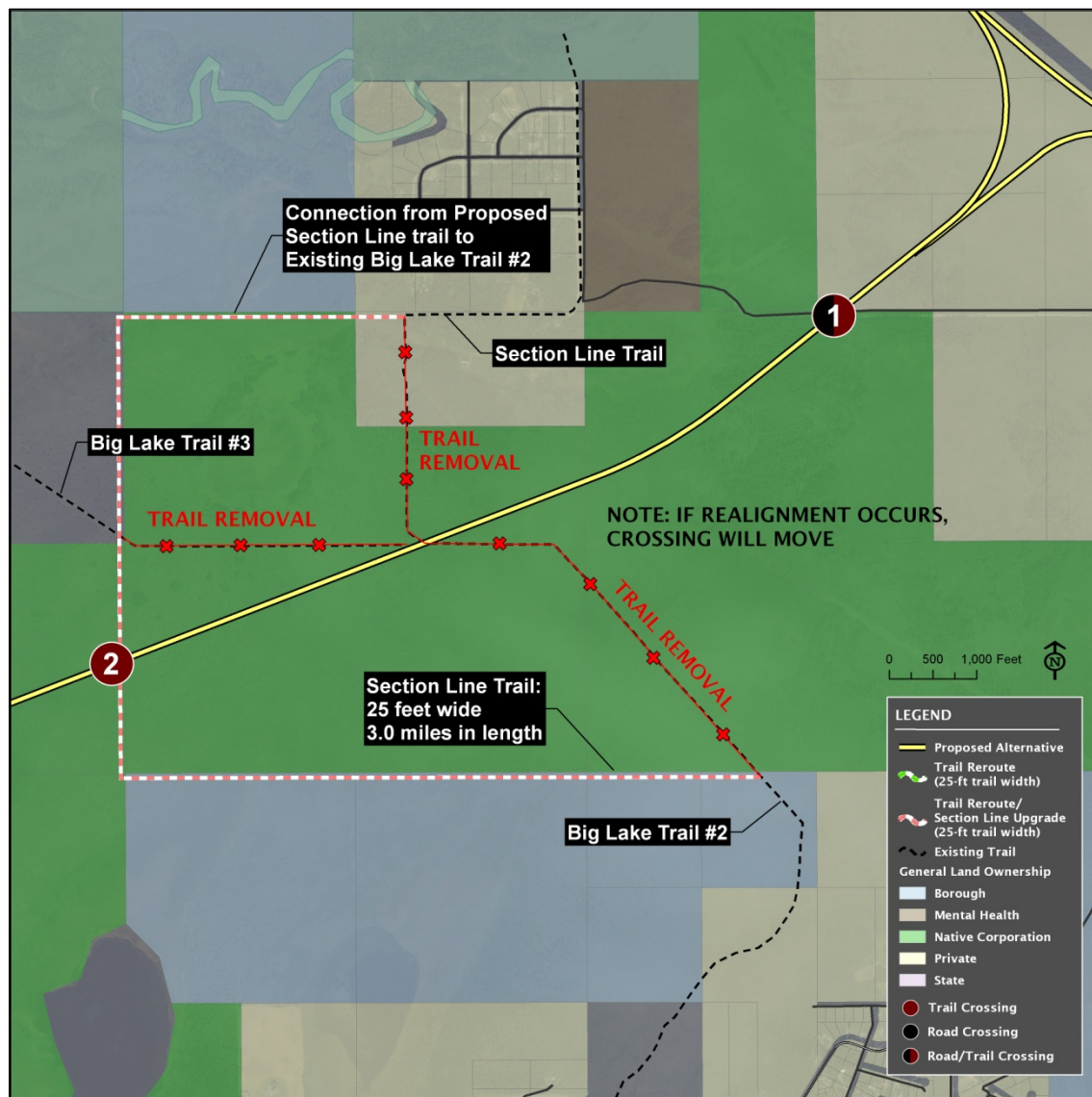


Exhibit 10: Big Lake Trail #2 Reroute

¹⁶ Cook Inlet Regional Incorporated [CIRI] owns subsurface rights to this parcel.

Big Lake Trail #1 is currently located on the Gas Pad Access Road associated with Crossing 3 (see Figure 1 and Table 4). The Houston Lake Loop Trail is currently located on MHLT to the north of an unnamed lake west of Little Horseshoe (or West) Lake. Currently, extensive portions of the Houston Lake Loop Trail are in trespass, including the location of the previously proposed bridge crossing (Crossing 2). Accordingly, the MSB has proposed a new crossing location and trail reroute that is along an existing section-line easement, allowing for legal, safe access across the new rail line (Exhibit 11). There will be a separated grade crossing at MP K 27.9 for the relocated trail that will include a four-span bridge with the second span providing approximately 14-feet of vertical and over 25-feet of horizontal clearance. The second and third spans will provide additional line of sight for approaching trail users and will convey a small anadromous fish stream.

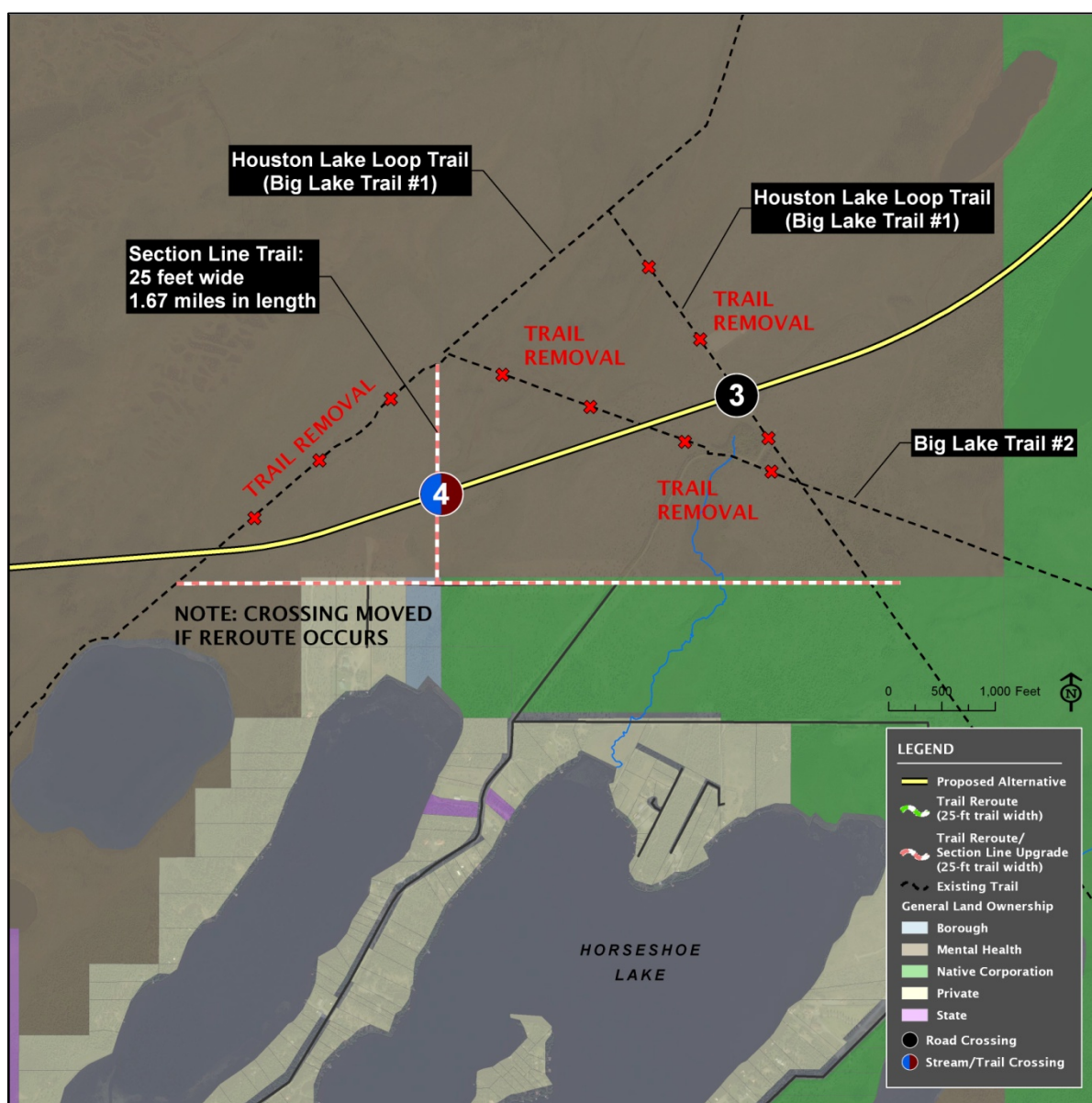


Exhibit 11: Houston Lake Loop Trail Reroute

Additional crossings

Since the draft *Implementation Plan*, two crossings have been added to improve connectivity and safety. The first crossing is in Segment 3 between the proposed bridge at Crossing 11 (Outflow of Diamond Lake) and the Ayrshire Avenue at-grade crossing (Crossing 13). Several cleared seismic survey lines converge in the vicinity of MP K 15.2, between Crossings 11 and 13, and are reportedly used as unofficial recreational trails. The Project Team anticipates the area may be subject to unauthorized crossings at this location and wants to allow for safer crossings at this location. In an effort to dissuade ARRC ROW trespass and ensure a safe crossing opportunity in a location where crossings are expected, even though the cleared lines are not within a formal trail plan, the Project Team proposes to install an oversized culvert structure to maintain access for recreational users of these trails (Crossing 12; see Table 4 and Attachment A, Figure 1).

A second crossing has been added in Segment 2 at Reddane Avenue (Crossing 15) within the Point MacKenzie Agriculture District (Attachment A, Figure 1). Reddane Avenue (Crossing 15) is a farm road that numerous landowners in the area have requested remain open and unobstructed due to both safety and traffic concerns. This crossing will be grade separated (railroad over the road) due to the landowner concerns and grading required for the Terminal Reserve. No trail is associated with this crossing, and this area is reportedly not heavily used by recreational trail users; however, the crossing will include accommodations for recreational users (see Table 4).

Table 3: Summary of IDSHD Workshop Comments/Issues and ARRC Mitigation Commitments

Issue #	Comment/Issue Summary	ARRC/Project Team Mitigation Commitment	Implementation
1	Increase height/vertical clearance of grade-separated crossings to 12'+	Grade-separated trail crossings will provide a minimum vertical clearance of 14', with two exceptions: Crossings 14 (~12') and 16 (10-14') (see Table 4 for crossing details).	Design standards have been developed (see Exhibit 1) and communicated to the Project Team, and will be implemented during final design and construction of crossings.
2	Consider length of a sled dog team (~85') during design of trail crossing approaches	Trail approaches will allow, at a minimum, a 100'-long team to turn/pass safely at approaches (e.g., Iron Dog Connector Trail and Flat Lake Connector, where trail approaches will be modified).	Design standards have been developed (see Exhibit 2) and communicated to the Project Team, and will be implemented during final design and construction of trail approaches to crossings.
3	Consider line of sight during crossing design; single-span bridges do not provide adequate line of sight	Bridges will include a minimum of 3 spans (20'+ horizontal clearance) and trail approaches to these crossings will allow adequate line of sight (see Table 4 for crossing details).	Design standards have been developed (see Exhibit 1) and communicated to the Project Team, and will be implemented during final design and construction of crossings.
4	Consider growth and development in crossing design	At-grade trail crossings will not be turned into road crossings. Officially recognized trails co-located with roadways will include separated crossing panels for the trails along the roads (see Table 4 for crossing details).	Design standards have been communicated to the Project Team and will be implemented during final design and construction of crossings.
5	Obtain easements for trails that do not have them	The Project Team/MSB will continue efforts to secure easements for certain existing trails and rerouted legal trails (Big Lake Trail #5 - Iron Dog Connector Trail, Flat Lake Connector - Iron Dog Trail, Houston Lake Loop Trail, Big Lake Trail #2, and Iditarod Race Trail).	The Project Team /MSB is working with land owners to obtain easements for the specified existing trails in the project area that do not currently have legal easements and for recognized trails that are proposed to be rerouted as part of the project.
6	Provide participants with constraints map illustrating where crossings cannot be located	NA – Resolved. A constraints map was presented at the MSB Open House (Attachment F) and IDSHD Workshop 3 (Attachment G). The map was posted on the project website (http://www.portmacrail.com/maps/Constraints_v2%20web.jpg) and is included in Attachment A (Figure 3).	No further implementation needed.
7	Add crossings between Crossings 2 and 10 to maintain connectivity	The Project Team will continue efforts to identify additional crossings between Crossings 2 and 10. Constraints for crossings in this area include: safety concerns, regulatory issues, design issues, property ownership, and property/easement constraints.	The Project Team is working with landowners, agencies, and trail users to identify additional crossings in the project area between Crossings 2 and 10.
8 and 9	Provide crossing for the Iron Dog Connector Trail and the Flat Lake Connector Trail	The project will include a crossing and reroute for the Iron Dog Connector Trail and the Flat Lake Connector Trail (Crossing 5).	The Project Team/MSB is working with MHLT to acquire trail reroute easements (Exhibit 4). If MHLT does not grant an easement for the reroute, the Project Team will notify workshop participants and provide a revised proposal for continued access and connectivity.

Issue #	Comment/Issue Summary	ARRC/Project Team Mitigation Commitment	Implementation
10	Incorporate safety considerations into design for Houston 6.3 crossing (Crossing 5)	Crossing 5 will incorporate safety considerations, including trail crossings on either side of creek that exceed minimum design standards (see Table 4 for crossing details).	These design standards have been developed (see Exhibits 3 and 4) and communicated to the Project Team and will be implemented during final design and construction of Crossing 5.
11	Provide crossing for the Iditarod Race Trail; obtain an easement from the University of Alaska	A crossing and reroute (if needed) will be provided for the Iditarod Race Trail. If an easement is granted for the trail, the crossing will exceed minimum safety/design standards (see Table 4 for crossing details).	The Project Team/MSB is working with UA to obtain an easement for the Iditarod Race Trail. If an easement can not be obtained at its current location, Crossing 9 will be eliminated and the Iditarod Race Trail will be routed to the Historic Iditarod Trail and Crossing 10 (see Exhibit 5).
12	Provide separated grade crossing (bridge) and trail improvements for the Iditarod NHT (Crossing 10)	A separated grade crossing will be provided for the Iditarod NHT that exceeds minimum safety/design standards (see Table 4 for crossing details).	Standards for crossings have been developed (see Exhibits 1 and 2) and communicated to the Project Team and will be implemented during design and construction of Crossing 10 and its approach.
13	Add a crossing for the trail between current Crossings 12 and 13	NA – Resolved. Based on consultation during the IDSHD Workshops/MSB Open House, this former trail is on private agricultural land and is no longer used. Therefore, no crossing will be provided at this location. Other crossings are available for use including a separated-grade crossing at an unnamed stream at MP K5.5 (Baker Farm Bridge, Crossing 16), an at-grade crossing at Baker Farm Road (Crossing 17), and a culvert at the Figure 8 Lake Loop Trail (Crossing 18).	No further implementation needed.
14	Provide trail along one or both sides of the proposed right-of-way (ROW) to maintain connectivity	The Project Team believes that the existing trail system west of the proposed rail corridor provides an adequate corridor for north-south connectivity with one exception (see Attachment A, Figure 4). The project will include development of an additional corridor between Crossings 7 and 10 (Exhibit 6) to fill this gap in north-south connectivity. Continued connectivity and accessibility will be considered during design of crossings and trail reroutes and the Project Team will continue to work with users to maintain connectivity.	The importance of continued connectivity and accessibility has been communicated to the Project Team and will be addressed to the extent practicable as part of final design of crossings and trail reroutes.
15	Provide adequate signage to warn trail users	Signage posted as part of the project will be consistent with SnoTRAC guidelines, and kiosks will be placed at key points on trails, trail reroutes, and crossings.	Standards for signage have been developed (see Exhibits 7-9) and communicated to the Project Team and will be implemented during design and construction.

Issue #	Comment/Issue Summary	ARRC/Project Team Mitigation Commitment	Implementation
16	Consider creating a special use district (SPUD) or formalizing designation of the IDSHD for the NRHP	ARRC, in consultation with SHPO and the Working Group, will prepare a report that refines the boundaries of the IDSHD and develops guidance for identifying and documenting property types that could be contributing elements. (Note: designation of a new SPUD/expansion of an existing SPUD must be initiated by Community Council and approved by MSB Assembly. The IDSHD was found eligible for NRHP which is same level of consideration as being listed.)	ARRC will prepare a report to refine IDSHD boundaries and develop guidance for identifying and documenting property types that could be contributing elements to the IDSHD. The report will be developed in consultation with the Working Group, SHPO and IDSHD interests; it will be submitted to STB and SHPO for review and comment within one year of finalizing the <i>Implementation Plan</i> . Following a 30-day review and comment period, ARRC will address comments received as appropriate and submit a final report to STB, SHPO and appropriate consulting parties.
17	Hold a meeting with other trail users and postpone Workshop 3 until after this meeting	NA – Resolved. MSB sponsored a Trail User Open House (see Section 2.2.1) that included participants from multiple trail user groups. Comments/questions from participants were compiled, responded to, and posted on the project website (http://www.portmacrail.com/library.html) following the meeting. Workshop 3 was completed following this meeting (see Section 2.2.1 and Attachment G).	No further implementation needed.
18	Provide better/more detailed information on each crossing for the larger trail user meeting	NA – Resolved. The Project Team provided detailed information on crossings, approaches, and reroutes at the MSB Open House (see Attachment F). These maps/graphics include proposed crossing design schematics and aerial maps showing relocations and approaches for each crossing and were posted on the project website (http://www.portmacrail.com/library.html).	No further implementation needed.
19	Ensure that trails in the MSB trails plan will have continued connectivity	The Project Team will continue efforts to maintain connectivity for official trails such as those included in the MSB trails plan. Official trails that cannot be maintained in their current location will be rerouted, and easements will be acquired for the proposed rerouted trails.	The Project Team/MSB is working with user groups, agencies, and land owners to maintain connectivity for official trails and acquire easements for relocated trails.
20	Explain the process for how the final decision will be made on the crossings	NA – Resolved. The process for decision making for the crossings was explained to Workshop 3 participants (see Attachment G).	No further implementation needed.
21	Consider potential conflicts with moose during project design	The Project Team will design and construct crossings/approaches that will increase visibility for trail users and provide space for moose/wildlife to move away from rail embankment.	Design standards have been developed (see Exhibits 1-3) and communicated to the Project Team and will be implemented during final project design and construction

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Table 4: Trail/Crossing Summary

Status	Original No. ¹⁷	New No. ¹⁸	Milepost (Segment)	Common Name/ (Trail Name)	Crossing Type	Crossing Description	Comment
Important for Continued Functionality of IDSHD	1	1	K 31.9 (Segment 5)	Millers Reach Road and Trail Crossing	At-Grade (road/trail)	• 80' crossing width • 32' road surface • 10' separation, 8-10' trail (north) • crossing panels for road and trail	Crossing will accommodate an existing heavily used trail on the north side of Miller's Reach Road.
Important for Continued Functionality of IDSHD	2	2	K 30.2 (Segment 5)	Big Lake Trail #2 Crossing (<i>Big Lake Trail #2*</i>)	At-Grade (trail)	• minimum 20' crossing width • crossing panels	Big Lake Trail #2 is located in trespass in an existing MEA power line license on private land. The new trail crossing is planned for an area immediately west of the MEA corridor and along a section line easement.
	3	3	K 28.4 (Segment 5)	Gas Pad Access Road Crossing	At-Grade (road)	• 32' gravel drive width	The existing trail at this location is in trespass and will be relocated to Crossing 4. This road crossing will be for private use only to access a natural gas development area.
Important for Continued Functionality of IDSHD	4	4	K 27.9 (Segment 5)	Big Lake Trail #1 & Houston Lake Loop Trail Crossing (<i>Houston Lake Loop Trail*</i> , <i>Big Lake Trail #1*</i>)	Bridge (trail)	• 4-span bridge • 14' vertical clearance (center span) • 25'-3" horizontal clearance (center span)	No trail easement in place for these trails. The Houston Lake Loop Trail and Big Lake Trail #1 will be relocated to the section line easement west of a gravel (gas) pad on land leased from MHLT.
Important for Continued Functionality of IDSHD	5	5	K 22.8 (Segment 4)	Flat Lake Connector (Iron Dog)/Iron Dog Connector (Big Lake Trail #5)/Houston Lake Loop trail Crossing (<i>Flat Lake Connector Trail-Iron Dog Trail*</i> , <i>Big Lake Trail #5-Iron Dog Connector Trail*</i> , <i>Houston Lake Loop Trail*</i>)	Bridge (stream/trail)	• 5-span bridge • Minimum 14' vertical clearance (spans 2 and 4) • Minimum 25' horizontal clearance (spans 2 and 4) • Opening 3 is a stream channel	No trail easement is in place for these trails. Project Team is currently rerouting trails to section lines and negotiating with MHLT to obtain trail easement for approach to bridge/undercrossing; Project Team will reroute trail if easement not obtained. This crossing (spans 2 and 4) will accommodate the reroute of these trails. Vertical clearance was recently reduced to 14' minimum to minimize wetland impacts.

¹⁷ This column (Original No.) represents the crossing numbers presented at the IDSHD workshops/meetings and the draft *Implementation Plan*.

¹⁸ This column (New No.) represents the revised crossing numbers; this number is used throughout this document.

Status	Original No. ¹⁷	New No. ¹⁸	Milepost (Segment)	Common Name/ (Trail Name)	Crossing Type	Crossing Description	Comment
Additional Crossing – no current trail	6	6	K 20.7 (Segment 4)	Tributary of the Little Susitna River	Bridge (stream)	• 5-span bridge • 14'-6" vertical clearance • 25'-3" horizontal clearance (opening 2-4) • Opening 3 is a stream channel	Not connected to the established trail system. Spans 2-4 designed to meet height/width requirements for access to/along waterway for various user groups and allow continued overland winter travel in the project area.
Important for Continued Functionality of IDSHD	7	7	K 20.4 (Segment 4)	West Papoose Twins Road and Trail (Crooked Lake Trail-West Papoose Twins Road*)	At-Grade (road/trail)	• 52' crossing width • 32' road surface • 10' separation, 10' trail (north) • Crossing panels for road and trail	
Important for Continued Functionality of IDSHD	8	8	K 19.8 (Segment 3)	West Susitna Parkway	At-Grade (road/trail)	• 72' crossing width • 32' road surface • 10' separation, 10' trail (north and south) • 80' of crossing panels for road and trail	
Contributing to IDSHD	9	9	K 18.0 (Segment 3)	Iditarod Race Trail (Iditarod Race Trail*, Big Lake Trail #14*)	Bridge (trail)	• 3-span bridge • 14' vertical clearance • 25'-2" horizontal clearance (center span)	No trail easement exists. MSB is working with UA to develop an easement or will reroute trail to Crossing 10 if necessary. Bridge was raised to provide additional vertical clearance for trail grooming equipment.
Contributing to IDSHD	10	10	K 17.1 (Segment 3)	Historic Iditarod Trail (Iditarod NHT)*	Bridge (trail)	• 3-span bridge • 14' vertical clearance • 25'-3" horizontal clearance (center span)	Bridge was raised to provide additional vertical clearance for trail grooming equipment.
Additional Crossing– no current trail	11	11	K 16.8 (Segment 3)	Outlet of Diamond Lake	Bridge (stream)	• 5-span bridge • 18'-5" vertical clearance • 21'-11" horizontal clearance (spans 2 and 4) • 60' horizontal clearance (span 3; stream channel)	Not connected to the established trail system. Spans 2-4 designed to meet height/width requirements for access to/along the waterway for various user groups and allow continued overland winter travel in the project area.
Important for Continued Functionality of IDSHD		12	K 15.2 (Segment 3)	Unnamed Trail	Oversized Culvert (trail)	• 18' diameter culvert	Seismic survey lines used as unofficial recreational trails. Culvert to allow access for various user groups and allow continued overland winter travel in the project area.

Status	Original No. ¹⁷	New No. ¹⁸	Milepost (Segment)	Common Name/ (Trail Name)	Crossing Type	Crossing Description	Comment
Important for Continued Functionality of IDSHD	12	13	K 13.9 (Segment 2)	West Ayrshire Avenue	At-Grade (road/trail)	• 72' crossing width • 32' road surface • 10' separation, 10' trail (south) • 80' of crossing panels for road and trail	Considerations made for at-grade accommodation of trail vehicles on south side of the road for the annual Susitna 100 dog sled and multi-sport races.
Additional Crossing– no current trail	13	14	K 10.0 (Segment 2)	West Holstein Avenue	Bridge (road/trail)	• Road bridge over railroad with approximately 32' crossing width	Road over railroad; designed to allow access for various user groups.
Additional Crossing– no current trail		15	K 8.0 (Segment 2)	West Reddane Avenue	Bridge (road/trail)	• 3-span bridge • 60' width (32' deck with 12' on each side for trails)	Railroad over road.
Additional Crossing– no current trail	14	16	K 5.5 (Segment 1)	Baker Farm Bridge (Unnamed Stream)	Bridge (stream)	• 3-span bridge • 11'-9" to 12' vertical clearance • 19'-7" horizontal clearance (opening 1) • 25'-3" horizontal clearance (opening 2) • 19'-2" horizontal clearance (opening 3)	Not connected to the established trail system, but designed to allow access to/along the waterway for various user groups and allow continued overland winter travel in the project area.
Additional Crossing– no current trail	15	17	K 5.5 (Segment 1)	Baker Farm Road	At-Grade (road/trail)	• Existing road width	Emergency access route; no current consideration for trails.
Contributing to IDSHD	16	18	K 2.3 (Segment 1)	Figure 8 Lake Loop Trail Crossing (Figure 8 Lake Loop Trail, USGS Transmission Line Trail, Basemap Winter Trail Nos. 4 & 5)	Oversized Culvert (trail)	• 146' long multi-plate culvert (19'diameter) • 9' to 14' vertical clearance • 16'-3" horizontal clearance	A crossing, trail embankment and parking lot improvements are planned for the Figure 8 Loop Trail. Other contributing trails are in the same general area in the Port MacKenzie District. They apparently receive little use for dog sledding and would be consolidated with the Figure 8 Lake Loop Trail crossing.

* Officially Recognized Trail

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Attachment A: Figures

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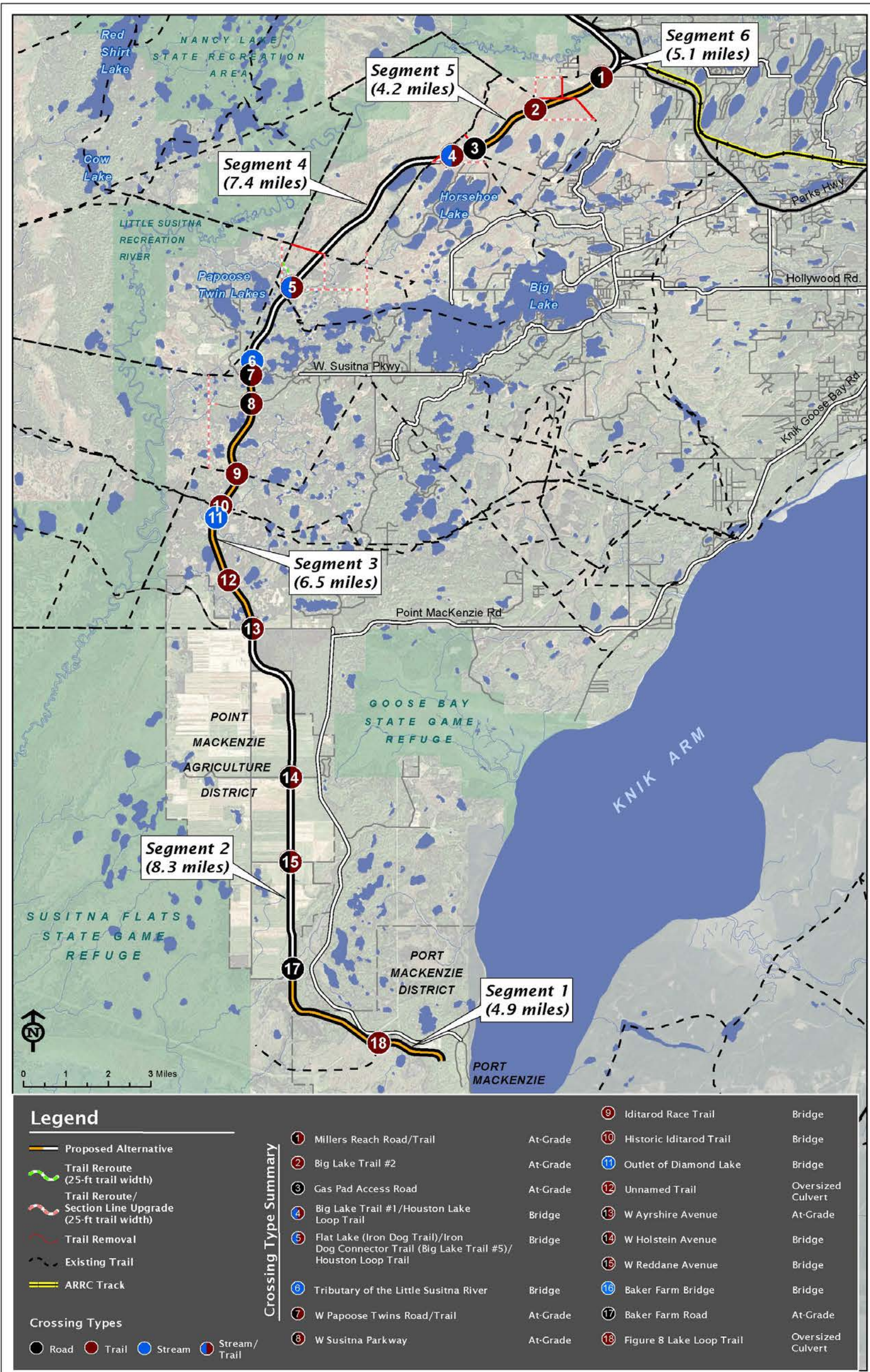


Figure 1: Project overview and crossing locations

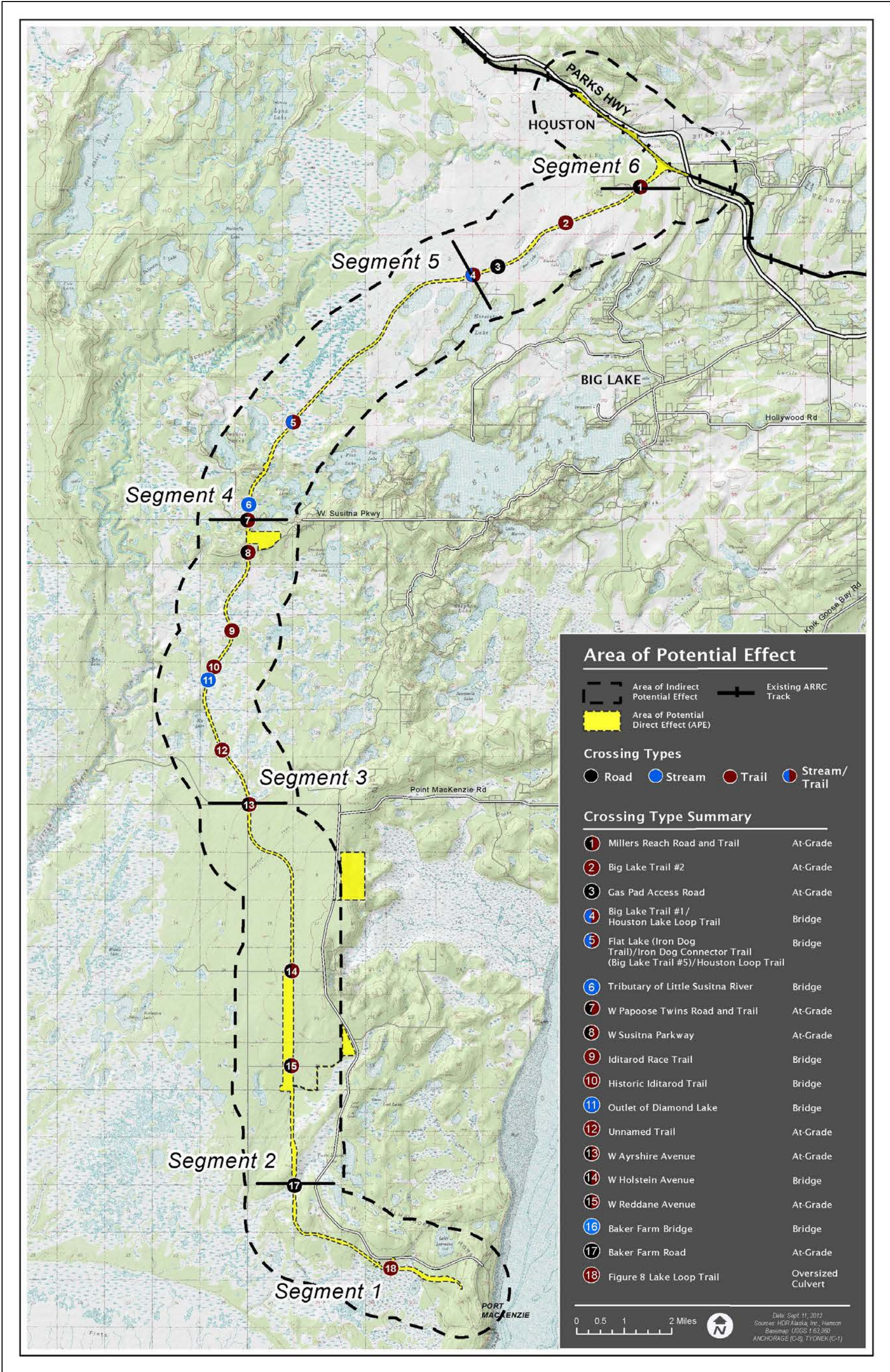


Figure 2: Area of Potential Effect (APE)

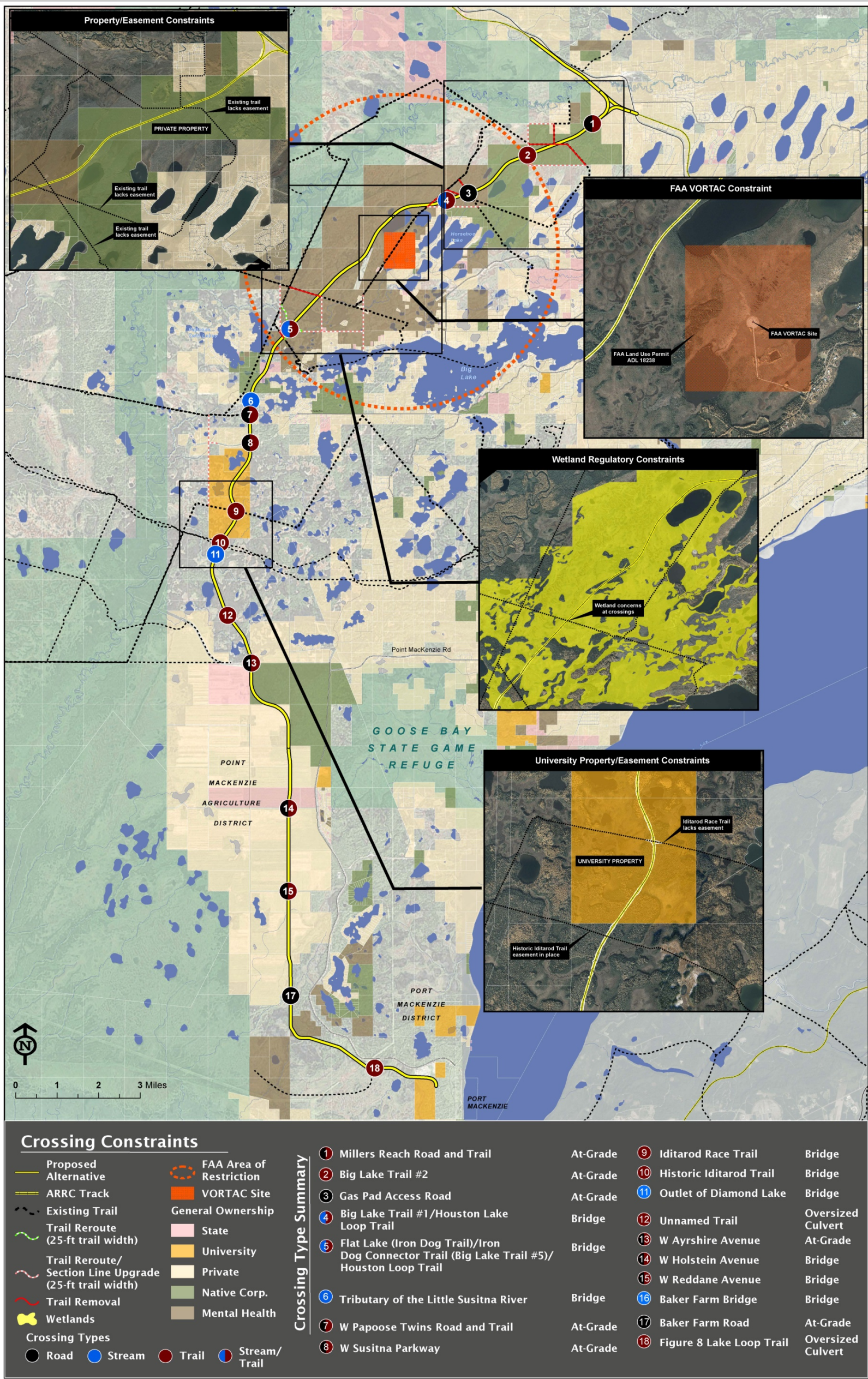


Figure 3: Constraints

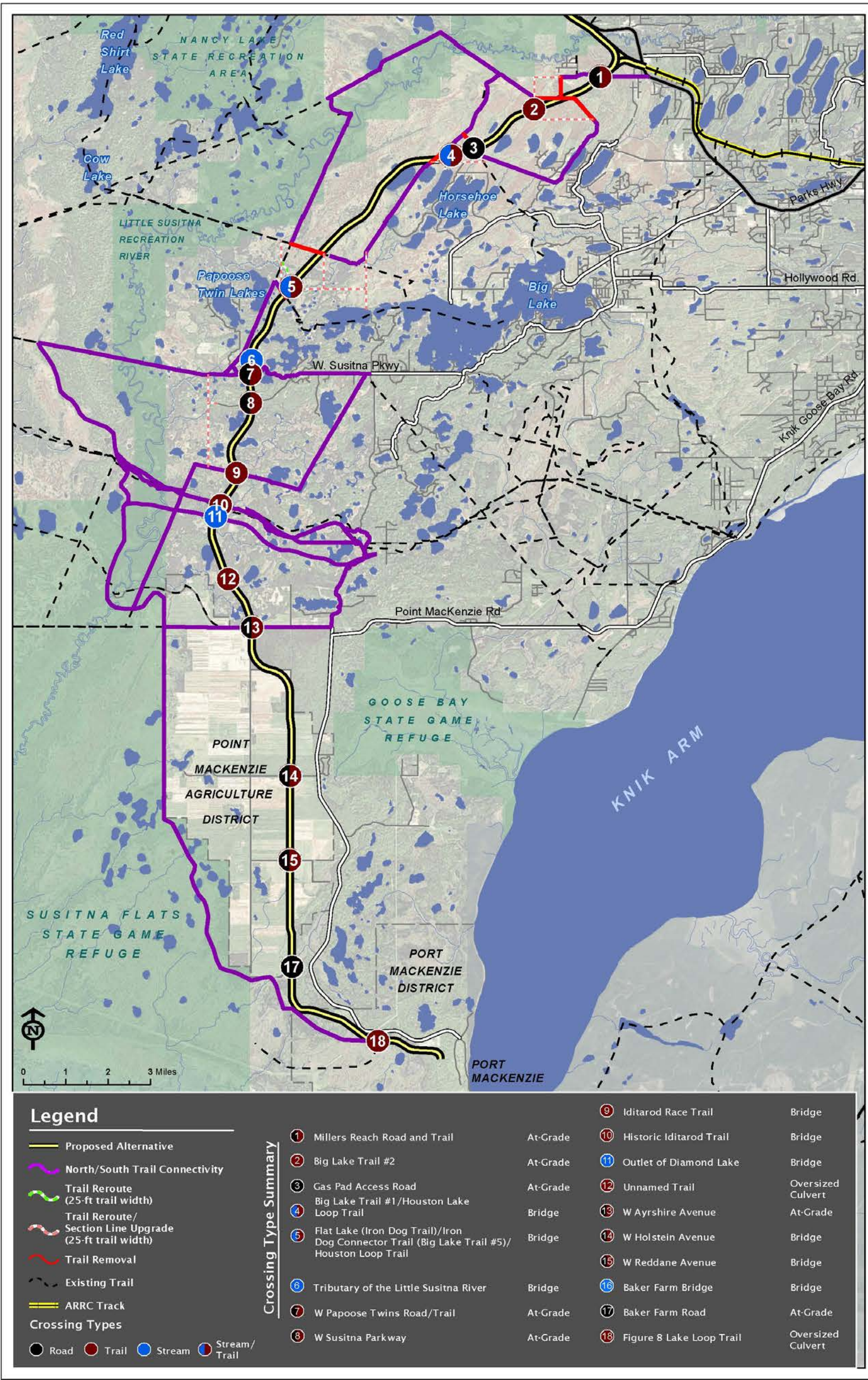


Figure 4: Trail connectivity

Attachment B: Glossary

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Archaeological sites/resources: Any physical evidence of past human life/activity; generally refers to resources that pre-date written history (i.e. prehistoric period) but may include newer materials; under the Archaeological Resources Protection Act, these are any material remains of human life/activity more than 100 years old

Area of Potential Effect (APE): Area where an undertaking may directly or indirectly cause changes in the character or use of a historic property.

Building: Any construction created principally to shelter human activity (e.g., house, cabin, barn, church, hotel/motel, shed, store, garage, etc.); should include all basic structural elements

Character defining feature: A prominent or distinctive aspect, quality, or characteristic of a historic property that contributes significantly to its physical character. Land use patterns, structures, objects, vegetation, spatial relationships, views, furnishings, decorative details, and materials may be such features.

Consultation: The process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process (36 CFR 800.16.f)

Contributing elements/features: A building, site, structure, or object that adds to historic significance of a cultural resource.

Cultural resource: Resource of cultural interest; consist of (alone or in combination) artifacts, sites, districts/landscapes, buildings, structures, etc.; cultural resources are any resource that is of a cultural character (e.g., historic places and cultural sites, prehistoric sites/features, artifacts, documents, traditional places and ways of life, social institutions, etc.)

Cultural landscape: A geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. Cultural landscapes are defined by and understood through multiple characteristics including land use and activities; patterns of spatial organization; response to the natural environment; cultural traditions; circulation networks (i.e., systems of movement); boundary demarcations; vegetation related to land use; buildings, structures and objects; and clusters/groupings of features; archaeological sites; and small-scale elements.

Direct effect: An effect caused by the action and occur at the same time and place (40 CFR 1508.8).

Historic district: A property category (e.g., site, building, structure, object, district) in the NRHP that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development (NPS NRHP Bulletin 15)

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (36 CFR 800.16(l)).

Historic sites/resources: Any physical evidence of past human life/activity; generally refers to resources that post-date written history (i.e., historic period)

Indirect effect: An effect caused by the action and later in time or farther removed in distance, but still reasonably foreseeable. Indirect effects may include growth inducing effects and other

effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems (40 CFR § 1508.8).

Integrity: The authenticity of a property's historic identity, evinced by the survival of physical characteristics that existed during the property's historic or prehistoric period. The seven qualities of integrity as defined by the NRHP are location, setting, feeling, association, design, workmanship, and materials.

National Historic Trail (NHT): A designation under the National Parks and Recreation Act of 1978 meant to protect the remains of significant overland routes that reflect national history. National Historic Trails may only be designated by an act of Congress.

Object: Constructions that are primarily artistic in nature or small in scale and simply constructed (e.g., monument, sculpture, signs, survey monument, etc.)

Officially recognized trail: A recreational trail that has been specifically established within currently adopted plans by DNR and/or MSB or is established within these plans at the time of construction or right-of-way (ROW) acquisition by ARRC or MSB (whichever occurs first). In addition, an officially recognized trail is used primarily for recreational purposes. The locations of officially recognized trails may or may not be provided for by recorded easements or ROW instruments. In some cases, officially recognized trails may be adopted by or mapped in a recognized trail plan, but a recorded easement or ROW instrument may not exist. The presence of a recorded easement or ROW easement is not sufficient alone to make the property an officially recognized trail.

Significance: The meaning or value ascribed to a cultural landscape based on the National Register criteria for evaluation. It normally stems from a combination of association and integrity.

Site: Location of a significant event, prehistoric or historic occupation or activity, or a building/structure where the location itself possesses historic, cultural, or archaeological value (e.g., campsite, battlefield, village site, designed landscape, rock shelter, shipwreck, etc.)

Structure: Constructions usually made for purposes other than creating human shelter (e.g., aircraft, automobile, bridge, dam, water tower, tunnel, etc.)

Unofficial trail: Any trail that is not specifically established within currently adopted plans by DNR and/or MSB or is established within these plans at the time of construction or ROW conveyance (whichever occurs first), and whose location is not provided for by recorded ROW or easement.

Attachment C: IDSHD Consulting Parties and Participants

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*Port MacKenzie Rail Extension Project
Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan*

Name	Organization	6/28/11 Workshop	7/7/11 Focus Group	10/27/11 MSB Open House	1/11/12 Workshop
Workshop/Meeting Participants					
Bud Smyth	Aurora Dog Mushers Club	x	x		
Carol Tyler	Aurora Dog Mushers Club			x	
Vern Cherneski	Aurora Dog Mushers Club		x		
Margaret Billinger	Big Lake Chamber of Commerce			x	
Dan Mayfield	Big Lake Trails		x	x	
Cathy Mayfield	Big Lake Trails			x	
Mike Donald	Big Lake Trails			x	
Cole Donald	Big Lake Trails			x	
Richard Gaffey	Big Lake Trails			x	
Jeff Bruno	DNR			x	
Kyle Kidder	DNR	x	x	x	x
Lesli Schick	DNR	x	x	x	x
Doug Gasek	DNR/SHPO	x	x		
Shina duVall	DNR/SHPO	x	x	x	x
Summer Rickman	DNR/SHPO				x
Judy Bittner	DNR/SHPO, Iditarod Historic Trail Alliance	x	x	x	x
Vern Halter	Dream a Dream Dog Farm	x	x	x	x
Martin Buser	Happy Trails Kennels				x
Ramey Smyth & Becca Moore	Homestretch Kennel	x	x		
Ralph Buzard	Houston Running			x	
Kevin Keeler	Iditarod National Historic Trail Administrator (BLM)			x	x
Terry Langholz	Iditarod Trail Blazers	x	x	x	x
Chas St. George	Iditarod Trail Committee	x	x		
Darrell Davis	Iditarod Trail Committee			x	
Greg Bill	Iditarod Trail Committee	x	x	x	x
Mark Nordman	Iditarod Trail Committee			x	x
Richard Plack	Jr. Iditarod Trail Manager	x		x	
Jon Brautigan	Knik Dog Mushers Association, Iditarod Trail Blazers	x	x	x	x
Kelley Griffin	Knik Dog Mushers Association	x	x		x
Angie Wade	Knik Tribal Council	x		x	x
Jaik Campbell	Mat-Su Trails Council			x	

Port MacKenzie Rail Extension Project
Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan

Name	Organization	6/28/11 Workshop	7/7/11 Focus Group	10/27/11 MSB Open House	1/11/12 Workshop
Sue Allen	Northern Lights 300 Dog Race			x	
Cim & Corinne Smyth	Perseverance Springs Farm	x	x	x	
Toby Riddell	Point MacKenzie Community Council			x	
Dale & Jenny Evans	Willow Dog Musers Association	x			
Donna Quante	Willow Dog Musers Association	x			
Sue Morgan	Willow Dog Musers Association	x			
Vic Stanculescu & Tina Owen	Willow Dog Musers Association			x	
Steve Charles	Willow Trial Committee	x	x	x	
Bill Johnson				x	
Chris Kosinski				x	
Elaine & Gene Martin			x		
Ellen Halverson				x	
Jim Clemensen				x	
Kathie Smith		x			
Mike & Anna Stephan		x			
Noreen Austermuhl				x	
Scott Lanene					x
Sharon Berg				x	
Project Team Members Participating in Workshops/Meeting					
Barbara Hotchkin	ARRC	x	x		x
Brian Lindamood	ARRC	x	x	x	x
Brad Sworts	MSB			x	x
Bruce Paulsen	MSB	x	x	x	x
Fran Seager-Boss	MSB	x	x	x	x
Heather Ralston	MSB	x			x
Todd Rinaldi	MSB			x	
Elizabeth Grover	HDR	x	x	x	x
Jessica Manifold	HDR	x		x	x
RaeShaun Schmidt	HDR	x	x	x	
Rosetta Alcantra	HDR	x	x	x	x
Zoe Meade	HDR				x
Invited Parties (did not attend)					
Bob Chlupach	Aurora Dog Musers Club				

Port MacKenzie Rail Extension Project
Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan

Name	Organization	6/28/11 Workshop	7/7/11 Focus Group	10/27/11 MSB Open House	1/11/12 Workshop
Larisa Meyers-McCoin	Aurora Dog Musers Club				
Kathy Chapoton	Happy Trails Kennels				
Joanne Potts	Iditarod Trail Committee				
Kevin Kastner	Iron Dog				
Harry Caldwell	Knik Dog Musers Association, Knik 200 Organization				
Barb Redington	Knik Dog Musers Association				
Richard Porter	Knik Tribal Council				
Debra Call	Knik Tribal Council				
Helen Hegener	Northern Lights Media				
Jody Simpson	Senator Huggins Office				
Bruno & Joan Bryner	Willow Dog Musers Association				
DeeDee Jonrowe	Willow Dog Musers Association				
Erin McLarnon	Willow Dog Musers Association				
Robert Sexton	Willow Dog Musers Association				
Cindy Bettine					
Dan & Alice Huttunen					
Frank Sihler					
Joe Meehan					
Kevin Saiki					
Lynn McCoin					
Roxann Dayton					
Sam Amato					

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Attachment D: Workshop 1 Summary and Materials

[see Attached CD]

Attachment E: Workshop 2 Summary and Materials

[see Attached CD]

Attachment F: MSB Trail User Open House Summary and Materials

[see Attached CD]

Attachment G: Workshop 3 Summary and Materials

[see Attached CD]

Attachment H: Draft Document Reviewer Comment and Response Summary

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*Port MacKenzie Rail Extension Project
Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan*

Comment #	Comment Date	Comment Author (Agency)	Document Section	Comment/Issue Summary	ARRC Response/Proposed Resolution
1	3/30/12	Catherine Glidden (STB)	General	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).	Participant discussions and comments at the IDSHD Workshops and MSB Open House focused primarily on access, safety, and connectivity concerns. While Workshop 1 was open to all persons (dog sledders) with an interest in the IDSHD, and Workshop 3 and the MSB Open House was open to trail users in general, Workshop 2 participants self-selected to be part of a focus group to discuss historic trails/features within the IDSHD. Even so, the discussions during Workshop 2 focused on access, safety, and connectivity. In addition, while SHPO concurred that the IDSHD is eligible for the NRHP under Criterion A at the national level of significance for the period of significance of 1967–1978 (i.e., the Iditarod Race and its development), there has been no concurrence on the boundary of and contributing elements to the IDSHD. SHPO has emphasized the need for connectivity and continued functionality of the district for dog sledding. ARRC added/revised text to include a general discussion of potential impacts to the IDSHD as a whole from the project (both adverse and beneficial).
2	3/30/12	Catherine Glidden (STB)	General	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?).	The purpose of this document is to fulfill the requirements of the PA (Stipulation V) and ROD (Mitigation Measures 92 and 93) which are summarized in Section 1.2. In addition, the focus of this effort shifted following the initial Workshops and consultation with SHPO away from discussions of IDSHD (and potential contributing elements) historic significance, integrity, etc. to one of continued access and connectivity of the larger trail system in the project area. Therefore, mitigation was aimed at trying to maintain connectivity and access and ensure safety on these trails to the extent possible. ARRC added/revised text to include a general discussion of what a historic district and cultural landscape are and potential impacts to the IDSHD as a whole from the project (both adverse and beneficial). The revised text also explains why the focus of the document is on access/connectivity rather than individual contributing elements to the district. ARRC also added a Glossary (Attachment B) to provide definitions of terms used in the document.
3	3/30/12	Catherine Glidden (STB)	General	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.	See ARRC responses to Comments 1 and 2. Design changes, modifications and refinements of the project to avoid, mitigate, or minimize adverse effects on the IDSHD are identified in this document (see Section 4.3 and Table 3 and Table 4).

Comment #	Comment Date	Comment Author (Agency)	Document Section	Comment/Issue Summary	ARRC Response/Proposed Resolution
4	3/30/12	Catherine Glidden (STB)	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?	The purpose of former Table 2 (now Table 4) was to show how project design has changed (i.e. a side-by-side comparison of "Original" design to "Revised" design) based on discussions with/input from the dog sledders and other trail users during the Workshops and Open House. ARRC revised this table to remove references to costs and for clarity.
5	3/30/12	Catherine Glidden (STB)	New 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.	ARRC revised former Table 1 (now Table 3) to include ARRC commitments and how these commitments will be implemented as well as revised the body of the document to make these connections more apparent
6	3/30/12	Catherine Glidden (STB)	P. 2, Sect. 2.1	Delete "were contacted" at the end of the third sentence in Section 2.1.	Text deleted
7	3/30/12	Catherine Glidden (STB)	P. 8, Sect. 3.3	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.	Reference to the Iditarod Race Trail and Iditarod National Historic Trail (NHT) has been made consistent throughout the body of the document
8	3/30/12	Catherine Glidden (STB)	P. 11	2nd to last paragraph, delete the word "at" from the phrase "Assuming the Corps at issues."	This text is no longer in the revised document
9	4/2/12	SHPO	Summary (Sect. 4?)	Condense the summary. The information needs to be succinct and lead the reader to the recommendations. Right now it is exhaustive and the relevant information is lost. Keep this section to one page, two at the most.	ARRC reviewed the document to ensure that discussion is succinct.
10	4/2/12	SHPO	Purpose (Sect. 1.2)	The purpose of the document is to create a workshop summary and implementation plan. (V.B.) Many of the purposes outlined in this document are not necessary such as identifying consulting parties, identifying contributing trails, identifying officially recognized trails, etc.	Section 1.2 is a summary of the purpose of the document which is based on the requirements of the PA (Stipulation V) and ROD (Mitigation Measures 92 and 93). These measures/stipulation specifically require identification of parties consulted, identifying contributing trails, providing rationale for relocating officially recognized trails, etc. The purpose of this document was agreed to in consultation with SHPO during the drafting of this document. Text has been added to clarify that this document meets the requirements of the PA and the ROD.
11	4/2/12	SHPO	Workshops (Sect 2.2)	Workshop summaries need to focus on the results, not goals. Goals and purposes are for the meeting, now we need to know results and issues. If there is desire to receive "credit" for the number of meetings, then identify that workshops were held on these days with a certain number of people participating. This is an example of course.	ARRC reviewed the document to ensure that discussion is succinct.

Comment #	Comment Date	Comment Author (Agency)	Document Section	Comment/Issue Summary	ARRC Response/Proposed Resolution
12	4/2/12	SHPO	APE (Sect. 3.1)	Simply say APE issue is resolved, see map.	The PA (Stip. II.D) required the Working Group to delineate a final APE with IDSHD parties – in consultation with SHPO, it was determined that this could be done during the IDSHD Workshops. ARRC disagrees that the language regarding APE should be removed; however, ARRC reviewed the text in this section to ensure that the discussion is succinct.
13	4/2/12	SHPO	IDSHD Description (Sect. 3.2)	Describe it briefly, say why it is eligible, and features found in it. There seems to still be a general confusion between character defining features and contributing elements.	Based on consultation with SHPO and IDSHD interests, it was determined that the purpose of the Workshops was not to identify contributing elements or character defining features. The focus of the participants was on continued access, connectivity and safety. ARRC added/revised text in Sect. 3.2 (and elsewhere as appropriate) to include a general discussion of what a historic district and cultural landscape are, what the IDSHD is, and potential impacts to the IDSHD as a whole from the project (both adverse and beneficial; see Comment 2).
14	4/2/12	SHPO	Officially Recognized Trails (Sect. 3.3)	We acknowledge the attempts made to minimize impacts to trails in EIS. However, this document is looking at impacts for a specific historic property under the National Historic Preservation Act. All the information was not present at the time of the EIS so all character defining features of this district will be discussed to ensure they are considered to the greatest extent feasible.	As summarized in Section 1.2, the purpose of this document is to meet the requirements of the PA and ROD, which is more than just a summary of the impacts to the IDSHD. As discussed above, it was determined in consultation with SHPO and IDSHD interests that the purpose of the Workshops was not to identify contributing elements or character defining features. This is why ARRC proposed the additional work on the IDSHD in Sect. 4.4. The scope for this work, which includes developing methods for identifying character defining features to the district and district boundaries, was developed in consultation with the Working Group and SHPO.
15	4/2/12	SHPO	Constraints (Sect. 4.2)	Again simplify. Include map in text and briefly describe each constraint with one or two sentences. Do not identify specific locations in the text.	Constraints were a significant point of discussion during the Workshops and Open House as they provide the basis for what (and why) the Project Team can and cannot do to mitigate general impacts to the IDSHD related to access and connectivity. ARRC reviewed the text in Sect. 4.2 again to ensure that discussion is succinct.
16	4/2/12	SHPO	Outcomes (Sect. 4.3)	Specify how ARRC will commit to specific changes. An example is “ARRC will ensure that all bridges/crossing will have a vertical clearance of 14’.”	ARRC revised former Table 1 (now Table 3) to include ARRC commitments and how these commitments will be implemented as well as revised the body of the document to make these connections more apparent
17	4/2/12	SHPO	Outcomes (Sect. 4.3)	Specify how the different trail crossing locations will be handled.	ARRC revised former Table 2 (now Table 4) to address each crossing

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18	4/2/12	SHPO	Outcomes (Sect. 4.3)	Include the how and when.	ARRC revised former Table 1 (now Table 3) to include ARRC commitments and how these commitments will be implemented. It may not be possible to provide specifics such as schedule as some decisions are not under ARRC control (e.g., negotiations with agencies and landowners). ARRC will commit to resolution of issues prior to final design and construction.
19	4/2/12	SHPO	Outcomes (Sect. 4.3?)	Mitigation to the entire historic property is necessary. The boundary and NRHP-like document needs to be carefully outlined so it is useable for the people living in the area, MSB, and SHPO. How it is written, it appears that yet another report will be produced. It also needs to be produced by someone that has experience writing NRHP nominations, not DOE's	The additional IDSHD documentation will be developed in consultation with SHPO, STB, the Working Group and IDSHD interests. This additional IDSHD documentation is a mitigation measure that ARRC agreed to at SHPO's request. The documentation will be prepared by a professional that meets SOI Professional Qualification Standards.
20	4/2/12	SHPO	Outstanding Commitment s/Issues (Sect 4.4)	There should be no outstanding commitments/issues at this point. Either commit, don't commit, or outline procedures. This is the final document, there is no more discussion.	ARRC reviewed and modified language in the document to clarify commitments. For issues that can not be resolved at this time (e.g., the MHLT and UA trail easements), a procedure for moving forward will be made clear. Added language that says the Project Team shall ensure that the issue is resolved prior to final design and construction?
21	4/2/12	SHPO	Table 2	Remove dollar figures. Historic preservation concerns are focused on the outcomes. There should never be a discussion if enough or not enough has been spent to mitigate.	ARRC modified former Table 2 (now Table 4) to remove costs (see Comment 4)
22	4/2/12	SHPO	General	Overall, this should be simplified so it is as useable as possible to the general public. Make sections digestible with maps and drawings included by the references in the text	ARRC reviewed the document for clarity and added text and exhibits/figures where appropriate.
23	4/2/12	SHPO	General	Consider restructuring the document so it is easier to use.	ARRC made no significant changes to the structure of the document. SHPO was involved throughout the drafting of this document (e.g., preliminary reviews of the proposed outline and drafts of the document) and was at Working Group meetings where this document was discussed. SHPO edits/comments were addressed/included in revisions of the draft document prior to its distribution to PA Signatories, the Working Group, Concurring Parties, and other IDSHD interests. Text and illustrations from the <i>Comment/Response Summary</i> (former Attachment G in the previous draft) have been incorporated into the body of the document as appropriate.

*Port MacKenzie Rail Extension Project
Iditarod Dog Sledding Historic District Workshop Summary and Implementation Plan*

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24	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	General	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 <i>officially recognized trail</i> , 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 nonhistoric 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.	This document was developed in consultation with the Working Group and SHPO. ARRC feels that there is sufficient overlap in the requirements of the PA and ROD mitigation measures to make combining reporting into one document. In addition, it became apparent during consultation with SHPO, the Working Group and IDSHD interests that mitigation for impacts to the IDSHD should not be limited to “historic” trails only and should address continued access and connectivity to trails throughout the network (including non-historic trails). ARRC has reviewed and modified the document to clarify mitigation in association with the IDSHD.
25	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	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 <i>possible</i> reroutes How will the above items be implemented by the plan, if they have yet to be resolved?	The implementation plan outlines ARRC commitments and how these commitments will be implemented. ARRC has reviewed and modified language in the document to clarify commitments (e.g., Section 4.3 and Table 3 and Table 4; see Comment 20). In summary: • The Project Team is committed to maintaining access and connectivity for the IDSHD. However, there are multiple constraints that prevent crossings from being added between Crossings 2 and 10. It is unlikely that crossings will be added in this area. If additional crossing locations are identified, the Project Team will notify consulting parties. • The Project Team is committed to maintaining access and connectivity for the Iron Dog Connector Trail, and believes that the reroute will maintain continued use. • This information regarding the FAA VORTAC issue was included in the draft <i>Implementation Plan</i> because this was a change in the project since Workshop 3. The Project Team is committed to seeking input from trail users as project design changes. • Regarding the additional IDSHD reporting, this document outlines the process for this additional documentation, which is an appropriate approach for an implementation plan. • The Project Team is committed to providing information to, and seeking input from, trail users as the project design changes. There are outstanding issues associated with trails on MHLT and UA lands that were not resolved before the draft <i>Implementation Plan</i> was required by the PA to be submitted (within 60 days of the IDSHD workshop), and these issues continue to be unresolved.

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26	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	General	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.	ARRC disagrees that a primary focus of the Workshops was on Officially Recognized Trails, and not connectivity. Overall, participant discussions and comments at the IDSHD Workshops and MSB Open House focused primarily on access, safety, and connectivity concerns. This was not the original intent of the Workshops (see Section 2.2.1), but this is what participants wanted to discuss even when directed in break out groups and asked about contributing/historic trails. Workshop 1 was open to all persons (dog sledders) with an interest in the IDSHD, and Workshop 2 participants self-selected to be part of a focus group to discuss historic trails/features within the IDSHD. Even so, the discussions during Workshop 1 and 2 focused on access, safety, and connectivity. Based on these discussions, it was decided in consultation with SHPO to shift focus. As discussed during the NEPA process, ARRC is obligated to provide crossings/relocations for officially recognized trails. However, ARRC has considered unofficial trails in developing crossing and relocation design to facilitate continued access and connectivity and the Project Team has been working to obtain easements for trails that currently do not have them. The Project Team did not record a formal comment from Jon Brautigan regarding Mitigation Measure 93 at the January 11 meeting. The Project Team believes that Mr. Brautigan's comment is addressed under Issue 16. In addition, this document was sent to all IDSHD Workshop/MSB Open House participants and no participant comments on or objections to the IDSHD document have been provided to the Project Team or ARRC to date. The proposed additional documentation for the IDSHD will include a discussion of the features that a contributing element to the district would have (e.g., what types of features, physical characteristics of these features that provide association with the district, important aspects of integrity needed to maintain association with the district).
27	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	General	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.	The maps count as crossings all at-grade or separated grade crossings (including, road, trail, and stream crossings) that are large enough to facilitate safe passage by people and trail grooming equipment. During IDSHD Workshops, the participants asked that these crossings be made usable by mushers for continued access and trail connectivity and noted that they travel along streams during the winter when they are frozen. This project will not be constructing new trails with the exception of trails that have to be relocated as a result of the project. ARRC has revised former Table 2 (now Table 4) to reflect whether a trail is associated with the crossing or designed for use possible recreational use.

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28	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	P. 4	Page 4 states: “ <i>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.</i> ” 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.	One purpose of the IDSHD Workshops was to discuss and receive input on APE. The presentation in Workshop 1 included an explanation of direct versus indirect effects. Text has been added in Section 3.1 to clarify what is meant by “indirect effects” and a definition is included in Attachment B (Glossary).
29	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	P. 9	Page 9 states: “ <i>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).</i> ” 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.	The loss of this crossing occurred prior to FAA’s decision and was based on conditions at this crossing being adverse for providing a minimum 14’ vertical clearance as requested by IDSHD Workshop participants. ARRC has revised the text in Section 4.2 to provide clarity and reflect current plans for this area; this sentence has been deleted.
30	4/2/12	Lesli Schick (DNR, DMLW, SCRO)	General	Additionally, some of the maps in the main document have the old rail alignment and some have the new one west of Mullshoe [sic] Lake. Please standardize the maps so that the current rail alignment is used throughout.	ARRC has revised maps in the document to reflect the latest alignment.

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