



EI-18793

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PROJECTS MAINTENANCE AND ENGINEERING

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Judith Bittner
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Alaska Department of Natural Resources
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Catherine Glidden
Environmental Protection Specialist
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Section 106 of the National Historic Preservation Act (36 CFR 800) Compliance
Port MacKenzie Rail Extension Project, 2011 Archaeological Surveys

Dear Ms. Bittner and Ms. Glidden:

In accordance with Stipulation III.B and IV of the Port MacKenzie Rail Extension (PMRE) Project Programmatic Agreement (Agreement; executed 6/15/2011), archaeological surveys were conducted in September and October 2011 within the proposed final Area of Potential Effect (APE¹) of Segment 1, the Section 6 Borrow Area and the Alsop Haul Road. This letter submits the Working Group's² 2011 Survey Report for a formal review.

The Working Group established level of effort and methodology for future surveys in a Memorandum of Understanding (MOU; executed 12/08/11) developed in consultation with the State Historic Preservation Officer (SHPO) and Surface Transportation Board (STB). Matanuska-Susitna Borough (MSB) cultural resource staff reviewed available information pertaining to previous cultural resource surveys and documented cultural resources included in the Alaska Heritage Resources Survey (AHRS) database and National Register of Historic Places (NRHP) as well as available literature pertaining to the prehistory, ethnography, and history of the project area. The MSB Cultural Resources Division previously conducted multiple reconnaissance surveys in the vicinity of the project area, as well as within and adjacent to the APE, between 1986 and the present. Stephen R. Braund & Associates (SRB&A) surveyed areas within and adjacent to the APE in 2008 in association with the PMRE project.

The Working Group prioritized areas for the 2011 survey based on proposed PMRE construction plans for 2011-2012. It was anticipated that construction for this period

¹ As defined at 36 C.F.R. § 800.16(d)

² The Working Group consists of the Alaska Railroad Corporation, Matanuska-Susitna Borough, and Knik Tribal Council

would include Segments 1 and 6, the Section 6 Borrow Area, and the Alsop Haul Road. Based on available information, the Working Group identified portions of the APE for direct effects within these proposed construction areas that were not previously surveyed and were moderate or high probability for cultural resources. The APE for direct effects primarily included the 200-foot right of way (100 feet from either side of the alignment centerline) and other ground disturbance areas that may be outside the 200-foot right of way (e.g., cut and fill areas and material sources/gravel quarries).

MSB and Knik Tribal Council (KTC) cultural resource staff conducted cultural resource surveys within the APE for direct effects that had not been previously surveyed. Both moderate to high probability areas as well as some low probability areas identified for possible survey during consultation between Working Group members and by the field crews were surveyed. Surveys conducted during the 2011 field season included pedestrian surveys with judgmental subsurface testing focused on Segment 1, the Section 6 Borrow Area, and the Alsop Haul Road. It was determined during consultation between the Working Group and SHPO that no surveys were needed for Segment 6 as the APE primarily consists of existing railroad right-of-way and previous surveys in the APE for this segment were negative for cultural resources. One small area of this segment will include construction that is outside of the existing right-of-way; however, this area has been previously disturbed and includes material deposits from other areas (see attached figure).

Research and surveys conducted in 2011 identified and documented multiple cultural resources near the project area; however, all but one of these resources are modern in age and include tree stands, bear baiting stations, modern debris and survey monuments. One potential cultural resource, TYO-00276, is a cluster of three probable cultural depressions located within 3 meters of each other within the APE for the Alsop Haul Road. These features are of indeterminate age and no testing was conducted on them during the survey. MSB and KTC cultural resource staff believe that the depressions may be prehistoric cache pits based on their location and composition. MSB cultural resource staff reported TYO-00276 to the Office of History and Archaeology (OHA), and an AHRs form has been completed; however, it has not been evaluated for NRHP eligibility to date. Based on current construction plans, it is not anticipated that the Alsop Haul Road will be used by contractors. Therefore, we recommend that further investigation and/or evaluation of TYO-00276 not be conducted unless it is determined that the Alsop Haul Road will be used for project construction and these features cannot be avoided during design and construction of the haul road.

Based on previous surveys in and near the APE, the absence of documented cultural resources in the APE for direct effects, the locations and types of documented cultural resources outside of the APE, and the significant level of disturbance or presence of wetlands in much of the project area, we believe that this project will not affect historic properties in Segments 1 and 6 and the Section 6 Borrow Area.

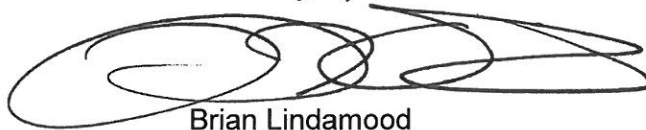
We recommend a finding of no historic properties affected for Segments 1 and 6 and the Section 6 Borrow Area. The attached report provides documentation of this finding as set forth in 36 CFR 800.11(d). No historic properties were identified in the APE for these proposed construction areas, and we do not believe that further survey work is needed in these areas prior to the start of construction. Construction contractors have been notified that should construction activities result in the discovery of cultural resources or

human remains, construction will be halted in the discovery area, and the ARRC Project Manager will be contacted immediately.

The Agreement stipulates that the Working Group submit the report to you for a 30-day review period (ending on February 25, 2012). However, based on the negative results of the survey for Segments 1 and 6 and the Section 6 Borrow Area, consultation with SHPO during previous Working Group meetings and the forthcoming onset of construction in Segment 1 (planned for February), we are requesting that you expedite your review and provide comments or concurrence for the recommended finding within 15 days (ending on **February 10, 2012**). Should we receive comments from you, the Working Group will incorporate them as appropriate and submit a revised final report to appropriate parties for their reference and records.

If you have any questions or if you wish to provide comments regarding the proposed project, please contact me at the address above, at (907) 265-3095, or by email at LindamoodB@akrr.com.

Sincerely, ,

A handwritten signature in black ink, appearing to read 'Brian Lindamood', with a stylized flourish at the end.

Brian Lindamood
ARRC Project Manager

Enclosures:
2011 Survey Report

cc w/o enclosures:
Victoria Rutson, STB
Shina duVall, OHA
Brad Sworts, MSB
Barbara Hotchkin, ARRC
Fran Seager-Boss, MSB
Angie Wade, KTC
Elizabeth Grover, HDR