



September 18, 2014

PROJECTS MAINTENANCE AND ENGINEERING

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Judith Bittner
State Historic Preservation Officer
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550 W. 7th Ave., Suite 1310
Anchorage, AK 99501-3565

Re: Section 106 of the National Historic Preservation Act (36 CFR 800) Compliance
Port MacKenzie Rail Extension (PMRE) Project, Multiple Property Documentation:
Iditarod Dog Sledding Properties in the Point MacKenzie Area, 1967-1978

Dear Ms. Bittner:

The Alaska Railroad Corporation (ARRC) is preparing to submit the final Port MacKenzie Rail Extension Project (PMRE) Multiple Property Documentation for Iditarod Dog Sledding Properties in the Point MacKenzie Area. The purpose of this letter is to inform you of ARRC's resolution of comments received from the Surface Transportation Board (STB) and your office. The attached Iditarod Dog Sledding Multiple Property (IDSMP) Document Comment-Response summarizes all comments received and the resolution of those comments, sorted by resolution type.

As you know, the Multiple Property Documentation is a follow-up to the Iditarod Dog Sledding Historic District (IDSHD) *Workshop Summary and Implementation Plan* (Implementation Plan). The Implementation Plan, which was required under the Programmatic Agreement (Stipulation V.B.), was completed in 2012. The scope of work for this document, as described in the Implementation Plan (page 28), was revised in 2013 based on consultation with SHPO and the Working Group. I have attached pertinent e-mail chains between ARRC, HDR, STB, and SHPO.

All of STB's comments have been addressed in the final document. We have also addressed as many of the comments from your office as possible. Unfortunately, we are not able to address all of the comments made by your office at this late stage. Our key concerns are summarized below:

- SHPO and the Working Group reviewed pre-submittal draft documents and all comments received were incorporated for the May 2014 submittal draft. Some of your office's new comments are untimely and are beyond, and in some cases contradict, those earlier comments and previous group decisions. For example, the focus of this document on properties within the APE was decided in consultation with SHPO and Working Group (see Comment 27).
- Some comments are inconsistent with the revised scope of work for the project agreed to by STB and SHPO (see attached email chains) as well as previous group decisions. For example, your new comments on the historic context would require a substantial rewrite of that section (see Comments 33 and 34). The revised scope of work indicated that this document's historic context would be based on the historic context used for determinations of eligibility for the IDSHD. The documentation conforms to that scope of work. As another example, we did not reevaluate the period (1967-1978) and level (national) of significance previously identified for the IDSHD during consultation between SHPO and STB for this Multiple Property Documentation (see Comments 18, 24, and 46).

- Some comments suggested reducing the amount of information in the report about the PMRE (see Comments 13, 29, and 30). The association between this Multiple Property Documentation and the PMRE project is clear, and we cannot avoid references to the PMRE project in this document. This document was prepared as a follow-on to consultation conducted for the Implementation Plan, and based on consultation during its preparation, it is tied to PMRE APE and Study Area. This documentation was never meant to be separate from the PMRE project. By removing ties to the study area and APE (contradictory to previous SHPO consultation), there is no justification for focusing evaluations on specific trails, thus opening us up for having to evaluate trails not impacted by this project (e.g., throughout the Matanuska-Susitna Borough or statewide). That said, we have removed some of the project-specific language to the extent we believe is reasonable.

In one instance, your comments indicated there are technical inaccuracies in the document (see Comment 16). There are also comments for which we are unsure what changes are being requested (see Comments 19, 20, 35, 37). We would like to afford you the opportunity to provide us with specific corrections and/or clarifications that you would like incorporated. If you can provide those specific edits within two weeks, we would be pleased to include them in the final documentation. If you prefer to discuss in person, we are available in mid-October to set up a meeting.

As with previous final versions of reports prepared for this project, we will send you an electronic and hard copy of the final Multiple Property Documentation. This will complete our obligations for this deliverable.

If you have questions or comments, please contact me at (907) 265-3095, or by email at lindamoodb@akrr.com. You may also contact Elizabeth Grover with HDR at (907) 644-2077 or Elizabeth.Grover@hdrinc.com. Please provide your response by October 10, 2014.

Sincerely,



Brian Lindamood
ARRC Project Manager

Enclosures:

- IDSMP Document Comment-Response, sorted by resolution
- Email chain following 11/20/13 meeting SHPO to discuss scope of Multiple Property Documentation
- Email chain including the original and revised SOW as well as SHPO's (and STB's) response/agreement on the revised SOW
- Email chain regarding SHPO's review of the 2nd pre-submittal draft of the Multiple Property Documentation

Cc: via e-mail, with enclosures
Catherine Nadals, STB
Elizabeth Grover, HDR
Kathryn Kusske Floyd
Fran Seager Boss, MSB
Klaudia Klaudi, KTC

IDSMP Document Comment-Response

Comment #	Commenter	Location in document	Comment	ARRC Response	Resolution
2	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	General (transmittal email)	I revised some sections (mainly, the introductory sections). I noticed that the figure numbers showed that I had made changes (which I didn't intend to).	Ignored revised figure numbers Edits to text (pp. 1, 5, 9, 10, 12, 31, 33) accepted	Edit complete
3	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	p. 7, 2 nd to last paragraph	The Project Team posted IDSHD-related events and associated materials on the project website and notified consulting parties when the materials had been posted. Comment: First mention of the website. I would say what it is first and also list the URL.	Added footnote about the project website with explanation and URL	Edit complete
5	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Section 4, p. 11, 1 st paragraph, 2 nd sentence	While the Iditarod Race formerly passed through the project area along portions of the historic Iditarod Trail, lack of snow cover forced the race restart to move from Wasilla to Willow beginning in 2002. Comment: What's race restart?	Revised text to add clarification/explanation	Edit complete
7	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Table 5-1	This section is not even (bullets)	Fixed formatting	Edit complete
8	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Section 6.1, p. 14, 1 st bullet	Iditarod NHT ⁵ (Knik to Susitna Station; also known as Knik-Rainy Pass Trail TYO-00085/ANC-00761) ⁵ This trail was designated as a NHT in 1978 but has had no determination of eligibility for the NRHP to date. Comment: The footnote makes no sense given that this document later recommends the NHT NRHP eligible	Revised footnote for clarity	Edit complete
9	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Section 6.1, p. 15, 2 nd paragraph (after bullets)	It should be noted that none of the identified associated properties in this document are currently individually listed on or eligible for the NRHP. Comment: Why not eligible? Do you mean assessed under the NRHP? Could they still be eligible?	Revised text for clarity	Edit complete
11	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Figure 6-9	Key is hard to read and is blurry and needs to be fixed. I would then move it to the top right corner (as I have) since the trail is not located there.	Revised/replaced figure	Edit complete
12	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Section 6.3, p. 31, 4 th paragraph	As the USGS Base Map Winter Trails (ANC-03478/TYO-00228 [1], TYO-00229 [2], ANC-03480 [3], ANC-03481 [4], ANC-03482 [5]) do not possess the characteristics and features that would qualify them as eligible for the NRHP under the IDSMP, and do not convey historic significance, it is recommended that these trails not be considered eligible.	Revised text for clarity	Edit complete

IDSMP Document Comment-Response

Comment #	Commenter	Location in document	Comment	ARRC Response	Resolution
			Comment: Should say something here about access issues as it seems this is the real constraining issue in determining eligibility.		
39	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 4.2, p. 11, 2 nd paragraph	Revised text: "The 2,200 miles of winter trails affiliated with the Iditarod NHT is currently administered by the BLM. The Iditarod NHT crosses private, Native-owned, <u>and</u> public lands managed by various agencies between Seward and Nome. Therefore, upkeep and maintenance of these trails is complicated. The Iditarod National Historic Trail, Inc. (<u>d.b.a. Iditarod Historic Trail Alliance</u>), a nonprofit organization, as well as various "Trail Blazer" clubs in communities along the trail, use volunteer laborers and grants to maintain and mark the trails."		Edit complete
36	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 4.2, p. 10, 4 th paragraph, 2 nd sentence	Revised text to: "In 1978, the Iditarod NHT was established by Congress and President James Carter signed the National Park and Recreation Act, which amended the National Trails System Act of 1968."	See Comment #35	Edit complete (pending revised language per Comment #35)
25	SHPO (district comments.docx)	Table 5-1	Text: "Established legal right-of-way or location for the trail in currently adopted plans (e.g., ADNR and/or MSB)" Comment: Is it common to make a requirement for integrity to be that a route is a legal right-of-way or the location is in a currently adopted management plan by the State or MSB? So, what happens if the borough removes a trail from the <i>current</i> management plan? Does it instantly lose integrity? I've just never seen a current management plan cited for a requirement of integrity, especially since these documents change over time. The legality of a right-of-way or containment within the current management plan appears to be an agency management issue and not a historic integrity issue.	The use of legal right-of-way was identified as a requirement for integrity in previous drafts and was acceptable to SHPO and the Working Group during their previous reviews. If a trail is moved outside of its established location, it would lose integrity just as a house moved to a different platted location would; however, removal of a trail from a plan would not necessarily result in loss of integrity unless the trail was no longer allowed to be used (e.g., land transferred to private ownership and use of the trail is no longer allowed). Text can be revised for clarification (e.g., "Established and/or legal right-of-way, or inclusion of trail in adopted plans")	Made minor edits to Table 5-1 and appropriate text (p. 18)
44	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Table 5-1	Under Trails, Characteristics, 9th bullet: "Established legal right-of-way or location for the trail in currently adopted plans (e.g., ADNR and/or MSB)" Comment: Question this as a criteria for eligibility	See Comment #25. The use of legal right-of-way was identified as a requirement for integrity in previous drafts and was acceptable to SHPO and the Working Group during their reviews. However, the text should be clarified.	Made minor edits to Table 5-1 and appropriate text (p. 18)

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Comment #	Commenter	Location in document	Comment	ARRC Response	Resolution
22	SHPO (district comments.docx)	Section 4.1, last paragraph page 9	The portion of the Iditarod Trail in the 1967 race was in use by mushers prior to the race. There was trail work done to make it safe for sprint racing, but the trail itself was not abandoned.	This information is primarily based on SRB&A 2010b as agreed to in the SOW	Made minor edits to text
23	SHPO (district comments.docx)	Page 11	The third sentence mentions the move of the Iditarod Race from Wasilla to Willow. The start of the race up till this sentence is referenced as Knik. Might want to be consistent and use Knik (even though Knik is Wasilla). Also, while the Iditarod Race restart moved, the Jr. Iditarod did not and still starts in Knik and uses the Iditarod Trail.	Note that this information is primarily based on SRB&A 2010b as agreed to in the SOW. Text could be added regarding continued use Junior Iditarod.	Made minor edits to text
28	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 1, p. 2, paragraphs 1-2	Text: "As a management tool, the multiple property approach alleviates many of these challenges as it removes the extensive boundary within which future undertakings could potentially be impacting the IDSHD. A benefit of the multiple property approach is that it streamlines organization of information collected about thematically-related properties (e.g., collected during surveys and research) for preservation planning purposes. In addition, it facilitates the evaluation of individually significant properties by providing a framework within which they could be compared with resources that share physical characteristics and historical associations. As part of this multiple property approach, the ARRC and SHPO consulted to revise the scope of work and goals for this supplemental documentation." Comment: Not sure this much justification for why MP (instead of district) is really needed here within this document at this point.	This discussion (as required/identified in the 12/04/13 SOW) explains the purpose of this document and why we deviated from the SOW identified in the <i>Implementation Plan</i> . However minor edits can be made.	Made minor edits to text
30	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 3. p. 7	Perhaps too much info on the PMRE project here. This should serve as a stand-alone document for many uses and audiences. Also, much of this repeats what is in the intro and overview. Suggest streamlining references to the project, 106 consultation, APE, effect finding, etc. considerably. It is ok for some of it to be in here, but this document does not need to reiterate all of that which is already captured in other documents such as the Implementation Plan and other consultation summary documents.	This discussion (as required/identified in the 12/04/13 SOW) summarizes the consultation regarding this property to date. If it is a stand alone document, it probably should reiterate this information, but minor edits can be made.	Made minor edits to text

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31	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 3. p. 7, 1 st paragraph, 4 th sentence	Text: "SRB&A's resulting recommendations (SRB&A 2010b) regarding eligibility for the cultural landscape were the basis for the determination of eligibility for the IDSHD and STB's finding of adverse effect that led to the PA for the PMRE project (see Section 1; Bittner, 2010; Rutson 2010)." Comment: remove PMRE project stuff	See Comment #13	Made minor edits to text
53	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 7, p. 33, 2 nd paragraph, 2 nd sentence	This multiple property approach <u>removes the need to delineate a specific boundary</u> , streamlines organization of information regarding thematically-related properties, and facilitates evaluation of individually significant properties by providing a framework within which they could be compared with historically related resources. Comment: Recommend discussing this with Jo. She commented that this is not exactly accurate.	We can go back to the language we used in the SOW (e.g., "The multiple property approach removes the extensive boundary identified for the IDSHD, streamlines organization..."	Made minor edits to text
45	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Table 5-1	Under Kennels, Characteristics, 7th bullet: Includes a food preparation area/facility and areas used to exercise and hitch dogs Comment: What about structures and buildings associated with dog kennel operations as mentioned on page 21 in Significance section?		Made minor edits to text to make language on p. 21 consistent with Table 5-1
26	SHPO (district comments.docx)	Table 5-1	Association is only with the <i>continuing</i> association of the Iditarod Race only. What if a kennel is associated within the period of significance but not today or there is a break for just a few years?? Why would it then loose it's association? Additionally, Association in 6.2.2 (page 24) states that the kennel needs to continue to use the INHT and the Iditarod Race. The INHT is not listed in the previous chapter(s) as a requirement for the continued association. Why is it being added in chapter 6?	The use of continuing association with the Iditarod Race was identified as a requirement for significance and integrity in previous drafts and was acceptable to SHPO and the Working Group during their reviews. Note: Section 5 and Table 5-1 state "Trails, kennels, and other buildings associated with the IDSMP retain integrity through continuity of use for Iditarod Race-related activities."	Made minor edits to text to make language on p. 24 consistent with Section 5 and Table 5-1
1	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	General (transmittal email)	I liked the revision. It was clear and concise and several sections were very interesting to read. I also loved the photographs etc. The document is a very nice resource.	N/A	N/A
4	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Section 4, Historic Context	Historic Context - Very interesting and well written! A joy to read!	N/A	N/A
6	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Table 5-1	This table works well.	N/A	N/A

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10	STB (PMRE-IditarodMultipleProperty-042813OEA.docx)	Figure 6-1	Great pictures!	N/A	N/A
52	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 7, p. 33, paragraph 1 and 2	This is a good and much simpler summary of why we think MP is a better tool than a district at this time. This justification doesn't have as much "project" info or background in it.	This is a "Summary" of what was presented earlier in the document. The discussion earlier in the document fulfills the agreed to SOW.	N/A
54	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 8	Shows that very little research was conducted	It is outside the agreed to SOW to do additional research.	N/A
13	SHPO (IDSMP General Comments.doc)	General	Lots of information/background in the report about the PMRE project. While this document is being prepared as a result of that project, it should be a stand-alone document and so references to the project and other documents associated with the project and consultation, should be minimal.	This document was prepared as a follow-up to consultation conducted with SHPO as part of the <i>Implementation Plan</i> . It is consistent with the scope of work (SOW) change, agreed to by STB and SHPO, that was outlined in the email from B. Hotchkin dated 12/04/13.	Recommend minor edits to document on pages 1-2 and 7-8.
14	SHPO (IDSMP General Comments.doc)	General	The report makes several references to the SRB&A report. The committee felt it would be helpful to bring in some of the content that is referenced, rather than require the reader to consult that report for more detailed information or to have to flip to Appendix A.	This would require a substantial rewrite. In discussions with SHPO, it was decided this document would be a clarification of SRB&A efforts (i.e., revise district to multiple property), not a duplication of those efforts. Excerpts of the SRB&A report are included as a convenience in an appendix, so a reader does not need a copy of the SRB&A report for more detail.	Recommend no change to document
17	SHPO (IDSMP General Comments.doc)	General	Recommend more emphasis on the 'grassroots' development of dog sledding and the history of the Iditarod in AK.	Note that this information is primarily based on SRB&A 2010b as agreed to in the SOW.	Recommend no change to document
18	SHPO (IDSMP General Comments.doc)	General	Overall the historic context could be strengthened. Level and period of significance were a topic of discussion in committee. Are these accurate and has the discussion of both been adequately addressed in the document? Local, State, National significance?	Note that this information is primarily based on SRB&A 2010b as agreed to in the SOW/consultation with SHPO. As agreed to during consultation, we used the period (1967-1978) and level (national) of significance identified for the IDSHD during consultation between SHPO and STB (see letter from Rutson/STB 2010 and Bittner/SHPO 2010). For additional information, see Comment #24.	Recommend no change to document
24	SHPO (district comments.docx)	Section 4	Why were 1967/1978 picked for the dates? For example, the Aurora Dog Mushers helped start the 1967 race (as well as other races listed in the report) and provided the seed money to establish the Iditarod Trail Committee, so why isn't 1962 the	See Comment #18. Note that this information is primarily based on SRB&A 2010b as agreed to in the SOW. The period of significance was assigned to the IDSHD with	Recommend no change to document

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			start of the period of significance, the founding date for this mushing association? Additionally, the Iditarod Race is a long distance race, the 1967/69 race is a sprint race (as are many of the club races held on these trail systems)	SHPO/STB concurrence and has remained through multiple SHPO reviews of this document.	
27	SHPO (district comments.docx)	6.1	While I understand that the APE is a certain size, it is odd that ANC-03473 (Aurora Dog Mushing Trail System) is in the APE, while ANC-03485 (the club house the trail system circumnavigates) is outside. Comment: The blue line below is the Aurora Dog Mushing trail system. The Iditarod National Historic Trail (INHT) bisects their trail system, and is used by Aurora for their longer events. There is a section of their loop system south of the INHT missing in the map (the INHT is the yellow trail). The missing section creates a gap in the loop systems needed for the training/races. (comments document includes a maps showing Aurora Dog Mushers Trails; INHT; Big Lakes Trails; and RST-118, Knik to Susitna)	Comment is untimely and inconsistent with previous group decisions. The APE was developed in consultation (with SHPO, STB, Working Group, and consulting parties including mushers) and is based on the project. It is not related to locations of possible cultural resources. Focus of this document on properties within the APE was decided in consultation with SHPO and Working Group. The use of this APE was established in previous drafts and was acceptable to SHPO and the Working Group during their reviews.	Recommend no change to document
29	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Figure 1-1 Summary Map	This map is helpful, but things like "APE" are not necessarily relevant to the MP. This document should stand alone and not necessarily be restricted by the PMRE project study area or APE.	See Comment #27 Focus of this document on properties within the APE was decided in consultation with SHPO and Working Group	Recommend no change to document
32	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 4, p. 9	Are there some discrepancies in the periods of significance discussed here? Underlined below: "SRB&A (2010b) identified several distinct historic periods associated with the history of dog sledding within the study area, including ..., the <u>Emergence of Dog Sledding as Recreation and the Iditarod Race (1940s-1973)</u>, and Dog Sledding Today (1973 through present)." "The IDSHD was found eligible for the period of significance associated with the <u>Iditarod Race (1967-1978)</u>, and..." 4.1 The Emergence of Dog Sledding as Recreation and the Iditarod Race <u>(1940s-1973)</u> "In the <u>1960s</u>, the introduction and popularity of snowmachines..."	See Comment #16. Note that this information is based on the IDSHD eligibility determination and SRB&A 2010b as agreed to in the SOW.	Recommend no change to document
33	SHPO (PMRE-IditarodMultipleProperty-	Section 4, p. 9	This context can be referenced and actual content be brought into the narrative / body of this document. Also, if appropriate,	This is asking for a substantial rewrite of this section. This information is primarily based	Recommend no change to document

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	042813_AKSHPO07021 4.docx)		the historic context can be further developed and elaborated upon based on what we know now and new research since SRB&A's past work.	on SRB&A 2010b as agreed to in the SOW. Comment is untimely and inconsistent with the approved SOW.	
34	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 4, p. 9, 2 nd paragraph, last sentence	Text: "Appendix A includes an excerpt from SRB&A's report that pertains to these periods." Comment: Seems odd that this is in an appendix. Can it be brought into the body of the document? If need to use quotes, that's ok, while also brining in new research/historic context content developed for the purposes of this document.	This is asking for a substantial rewrite of this section. This information is primarily based on SRB&A 2010b as agreed to in the SOW. Comment is untimely and inconsistent with the approved SOW.	Recommend no change to document
38	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 4.2, p. 11, 1 st paragraph, 4 th sentence	Deleted this sentence: "Currently, only a small portion of the Iditarod Race occurs within the study area boundary." Comment: Since this MP doc is being prepared independent of the project, recommend removing references to the "study area."	The focus on the study area was agreed to during consultation with SHPO and Working Group.	Recommend no change to document
40	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 4.2, p. 11, 3 rd paragraph	Revised text (removing references to the study area): "Dog sledding continues to be a major winter recreational and sporting activity. At least two dog kennels from the early days of the Iditarod Race continue to operate including Knik Kennels and Alaskan Kennel (see Section 6.2.2). A network of trails continues to be used by a variety of users including recreational and competitive dog sledders (see Section 6.2.1). The Aurora Dog Mushers Club continues to maintain its network of trails for local races (Section 6.2.3)."	The focus on the study area was agreed to during consultation with SHPO and Working Group.	Recommend no change to document
41	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 5, p. 12, 2 nd paragraph, last sentence	Text: "These trails were specifically noted as important during <i>Implementation Plan</i> consultation." Comment: Similarly, since this document is being prepared independent of the project, recommend removing references like this.	Disagree as this document was drafted because of consultation for the <i>Implementation Plan</i> .	Recommend no change to document
42	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Table 5-1	I know STB commented that they liked this table. Some on the committee felt it was cumbersome. May work better in a text format.	The information in this table is included in the text in Section 6. This is a summary table. In addition, previous SHPO review recommended edits to this table that were incorporated for this draft.	Recommend no change to document
43	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Table 5-1	Under Trails, Characteristics, 7th bullet: "Interconnected with other trails" Comment: More emphasis in narrative / body of document on the importance of connectivity and access.	There is currently discussion in the document regarding connectivity, continued use, and access (see Comment #15).	Recommend no change to document

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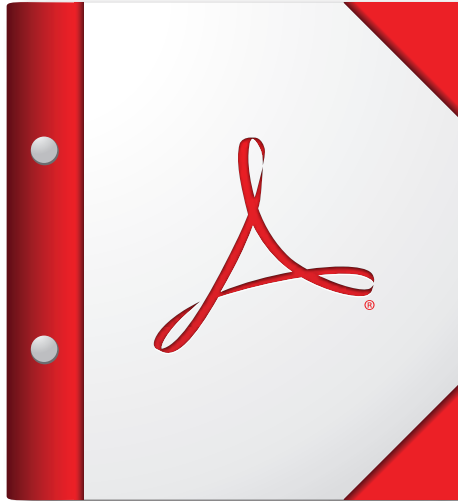
46	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.2.1, p. 17, 6 th paragraph, 2 nd sentence	Most importantly, these trails must be associated with the Iditarod Race during the period of significance, be connected to the network of trails, and be located within the study area with easy access and an established right-of-way. Comment: Why are these requirements for eligibility?	These are requirements that were included in previous drafts and consultation with SHPO and the Working Group. Comment is untimely and inconsistent with previous group decisions.	Recommend no change to document
47	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.2.1, p. 19, 1 st bullet	Location ⁷ - integrity of location has been retained if trails used by dog sledgers stay in the same right of way and landscapes used historically (with minor fluctuations because of snow, ice, and landscape conditions) Comment: Emphasize importance of interconnectedness here.	This is a discussion of location, so unclear how interconnectedness fits in or why it would be emphasized here. See Comment #15.	Recommend no change to document
48	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.2.1, p. 19, Integrity subsection	Recommend moving "Evaluation of Trails" under here (section 6.3)	In the previous review draft (December 2013), SHPO asked us to move Evaluation of Trails into its own section. We made that change.	Recommend no change to document
49	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.2.2, p. 21, Description subsection	However, these kennels are not located within the APE and are not evaluated in this report. Comment: APE is not necessarily relevant for the MP doc is it? Understand why they are not evaluated here, but they may be in the future regardless of their location with respect to the APE.	See Comment # 27 regarding APE. Text was added to Section 6.2.2 per SHPO comments on a previous review draft (December 2013): "In addition, there may be kennels within the study area that have not been identified to date but that were associated with the Iditarod Race and used during the period of significance. If so, they could be eligible under the IDSMP."	Recommend no change to document
51	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.3, p. 32, 2 nd paragraph (USGS Base Map Transmission Line Trail), last sentence	As the USGS Base Map Transmission Line Trail (ANC-03477/TYO-00227) does not convey the characteristics and features that would qualify it as eligible for the NRHP under the IDSMP, and they therefore do not convey historic significance, it is recommended that this trail not be considered eligible. Comment: Not enough evidence has been presented and evaluated to make an eligibility determination.	This is all the evidence we have at this time based on SRB&A 2010b and is consistent with information provided for other trails in this report. Comment is untimely and it is outside the agreed to SOW to conduct additional research.	Recommend no change to document
50	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO07021 4.docx)	Section 6.3, p. 27, 4 th par. (Iditarod NHT), 2 nd sentence	The Iditarod Trail was designated as a NHT in 1978. Comment: Reference "The Iditarod Trail (Seward-to-Nome Route) and Other Gold Rush Trails" , 1977	Is this comment suggesting we add a citation to this sentence? This seems to be fairly common knowledge, thus would not require a citation.	Recommend no change to document (pending SHPO clarification)
15	SHPO (IDSMP General Comments.doc)	General	The committee recommended more emphasis on the importance of connectivity and use, as well as the issue of access to trails.	This comment is vague. There is currently discussion in the document regarding connectivity, continued use, and access. As	Recommend no change to document. The importance of access,

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				summarized in Table 5-1, a trail must be interconnected with other trails, have easy access for dog sledders, and have continued use to meet the criteria for the IDSMP. Connectivity is discussed on pages 5, 8, 17, 18, 28, 29, 30, and 32. Continued use is discussed on pages 8, 13, 16, 21, 22, 25-30. Access was discussed on pages 8, 18, 28-30, and 32-33.	connectivity and continued use are already discussed.
21	SHPO (district comments.docx)	Page 1, last paragraph	What does the word "problematic" mean? Also, unless one is familiar with the history of the project, the entire paragraph reads like it is the reason SHPO gave for why the district is problematic, but the only citation is for the PMRE contractor.	This paragraph outlines why the district is problematic.	See Comment #13; made minor edits to text.
16	SHPO (IDSMP General Comments.doc)	General	A review of the discussion of the history of the Iditarod Trail is recommended. Judy felt that there were some technical inaccuracies in the document – specifically, some dates, publications, etc.	We can correct inaccuracies if they are specifically identified, but note that this information is primarily based on SRB&A 2010b as agreed to in the SOW.	SHPO to provide any necessary specific corrections
19	SHPO (IDSMP General Comments.doc)	General	Gold Rush Study 1978, Iditarod first of trails to be added to National Trails System Act	Unsure what change is requested here	SHPO to provide any necessary specific corrections/clarification
20	SHPO (IDSMP General Comments.doc)	General	Reddington, Pages, Centennial, 68	Unsure what change is requested here	SHPO to provide any necessary specific corrections/clarification
35	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 4.2, p. 10, 4 th paragraph, 1 st sentence	Text: "In 1977, Alaska's U.S. Senator Mike Gravel proposed naming the Iditarod Trail as the nation's first historic trail in recognition of the historical importance of this trail in the Alaska territory's development." Comment: This paragraph should be revised to more accurately reflect the administrative/legislative record on the designation of the Iditarod as a national historic trail. The 1968 National Trails System Act directed that 14 routes be studied for possible inclusion in the national trail system, including "Gold Rush Trails in Alaska." The resulting study, <u>Iditarod Trail (Seward –to-Nome Route) and Other Gold Rush Trails (1977)</u> , recommended the Iditarod Trail system be included in the National Trails System Act and designated as a National Historic Trail. In 1978 the National Trails System Act was amended to add historic trails to the national trail system. The 1968 NTSA only designated scenic trails. The Iditarod Trail was one of four historic trails designated in the 1978 amendment. The 1978 amendments to the National Trails System Act were included in Public Law 95-625 (The National	We are willing to add/revise this language per edits provided by SHPO	SHPO to provide any necessary specific corrections/clarification

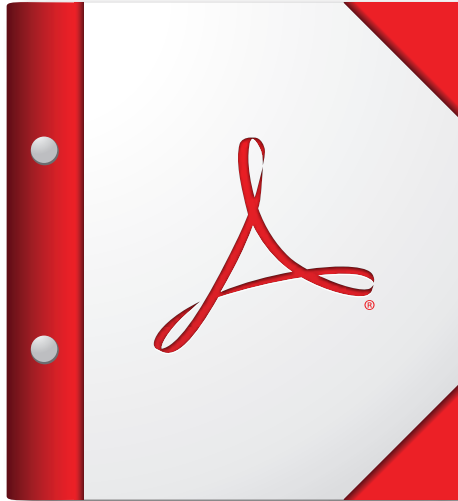
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			Park and Recreation Act)		
37	SHPO (PMRE-IditarodMultipleProperty-042813_AKSHPO070214.docx)	Section 4.2, p. 10, 4 th paragraph, last sentence	Text: "The Iditarod NHT commemorates a large system of winter trails (comprised of approximately 2,200 miles of which 1,500 miles are still open for public use)." Comment: You should check with DNR's Iditarod Easement Unit (Lesli Schick) to make your statement is accurate – whatever point you are trying to make in regard to the Multiple Property context.	We are willing to add/revise this language per edits provided by SHPO	SHPO to provide any necessary specific corrections/clarification



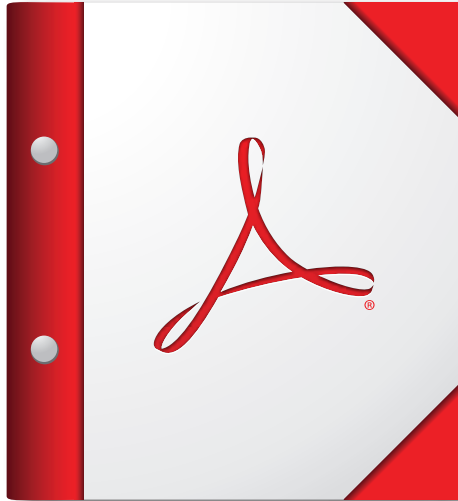
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