serve as a significant or distinguishable entity among Alaskan airports. As such, the Seward airport is not significant under Criterion C.

Criterion D
Properties may be eligible for the NRHP if they have yielded, or may be likely to yield, information important in prehistory or history.

The Seward airport lacks both a built environment and history of human activity where future archaeologists or historians could hope to conduct research in order to better understand the history of aviation in Seward. The airport currently lacks historic buildings and does not have a history that would indicate significant subsurface deposits would have been created. For these reasons, the Seward airport is not eligible for the NRHP under Criterion D.

Evaluation of Integrity

To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity; a property must possess several, and usually most, of the aspects of integrity that include: location, design, setting, materials, workmanship, feeling, and association (National Park Service 2002).

The Seward airport's potential to be listed to the National Register of Historic Places is based on its significance under Criterion A for its association with early aviation history in Alaska from 1927 to 1940. Despite being one of many airfields built in the late 1920's as a statewide effort to improve access and promote development throughout Alaska, it no longer retains any of the historic physical features and characteristics associated with its period of significance.

Although the location of the Seward airport today is similar to that of its original construction, aspects of the airport's design, setting, materials, workmanship, feeling, and association have been irrevocably compromised by subsequent improvements to keep the facilities in compliance with FAA specifications.

In the late 1920's, the Seward airport had two different stages of design. The original 1927 design of the airport consisted of single 200 x 1000 foot long airstrip carved out of the vegetation at a remote location near the naval radio station at the head of Resurrection Bay nearly a mile from Seward. Between 1929 and 1930, the Alaska Road Commission and the City of Seward shifted the airfield north of Radio Station Road and built two runways: one on an east-west axis and the second on a north-south axis (Figure 4). Work for both airfields required clearing existing forested areas and leveling them using local road construction equipment, dynamite, and hand tools. These design qualities unique to early airport construction in rural Alaska have been supplanted by a fully modern airport with two runways, parking aprons, taxiways, and support facilities built to FAA specifications.

The airport's original setting was characterized by its remote wooded location and its roughed-out nature of construction. Over time this setting has been altered by Seward's development and with improvements to the airport itself. Today, the airport itself is partially surrounded by the City of Seward and is bordered on its west side by an Alaska railroad yard and the Seward Highway. To its north are residential neighborhoods and commercial properties. To its south are docks and waterfront associated with support of tour lines and shipping companies. To its east, one of the channels of the Resurrection River has replaced forest land and now abuts runway 13-31. Likewise, the relatively primitive nature of both the original 1927 airfield and the 1930 airfield has been lost in the installation of flood lighting,

radio communication systems, landing strip lights, storage and support facilities, and the construction of fully modern runways featuring asphalt and striping. Little of the airport's original setting remains to depict the difficulty, danger, and dirtiness associated with early air travel to Alaska's first airfields nor the physical environment of the first airfields which had far fewer amenities than those today (Figure 24 provides a glimpse of on the ground conditions in 1964).

Modernization of the airport over the last 80 years, including its significantly larger footprint, paved surfaces, lighting, fencing, safety zones, expanded parking and storage areas, access roads, and array of specialized buildings have compromised aspects of the original airport's materials and workmanship. The sum of these changes are such that the Seward airport today no longer retains sufficient historic physical features to convey a feeling and association with the first years of aviation in Seward. Therefore, DOT&PF finds the Seward airport (SEW-01625) not eligible for the NRHP.

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Figures

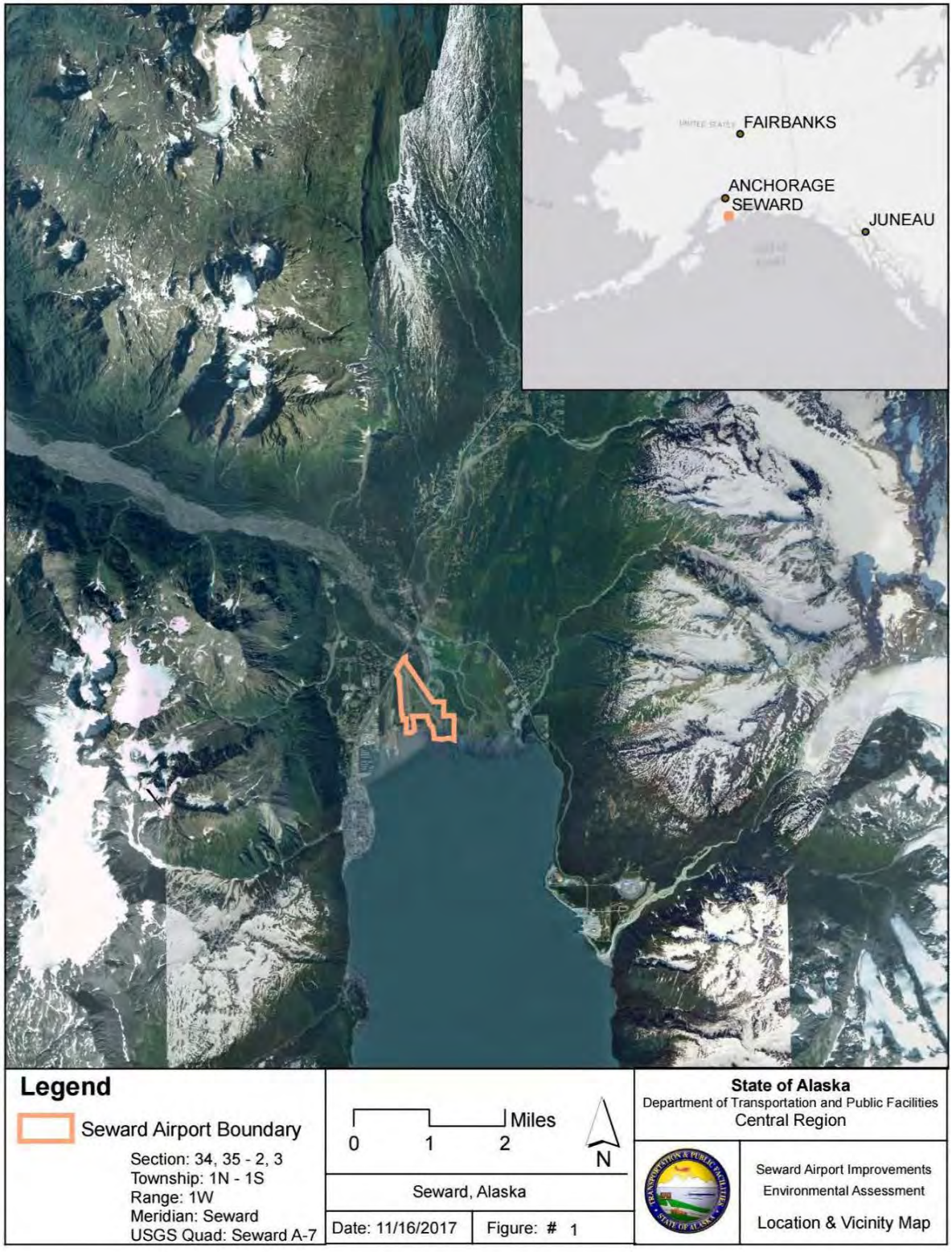

Figure 1. Location and Vicinity Map

Figure 4: Aerial photo of the expanded Seward airfield circa 1930. Image #2410.1.1 courtesy of the Resurrection Bay Historical Society.

Figure 5. Teacher Lurline Wilkins with students at airport with biplane taking off in background. May 10, 1943. Image #2410.1.7 courtesy of the Resurrection Bay Historical Society.

Figure 6. Map showing military land and the landing field at the head of Resurrection Bay.

Figure 7: August 8, 1950, aerial photo of Seward Airport. Photo from United States Geologic Service Earth Explorer aerial imagery viewer. Photo ID BM03710200353. https://earthexplorer.usgs.gov/

Figure 8: 1961 Aerial photo overview of Seward Airport. Note parked airplanes along Runway 16-34. Photo from DOT&PF archives.

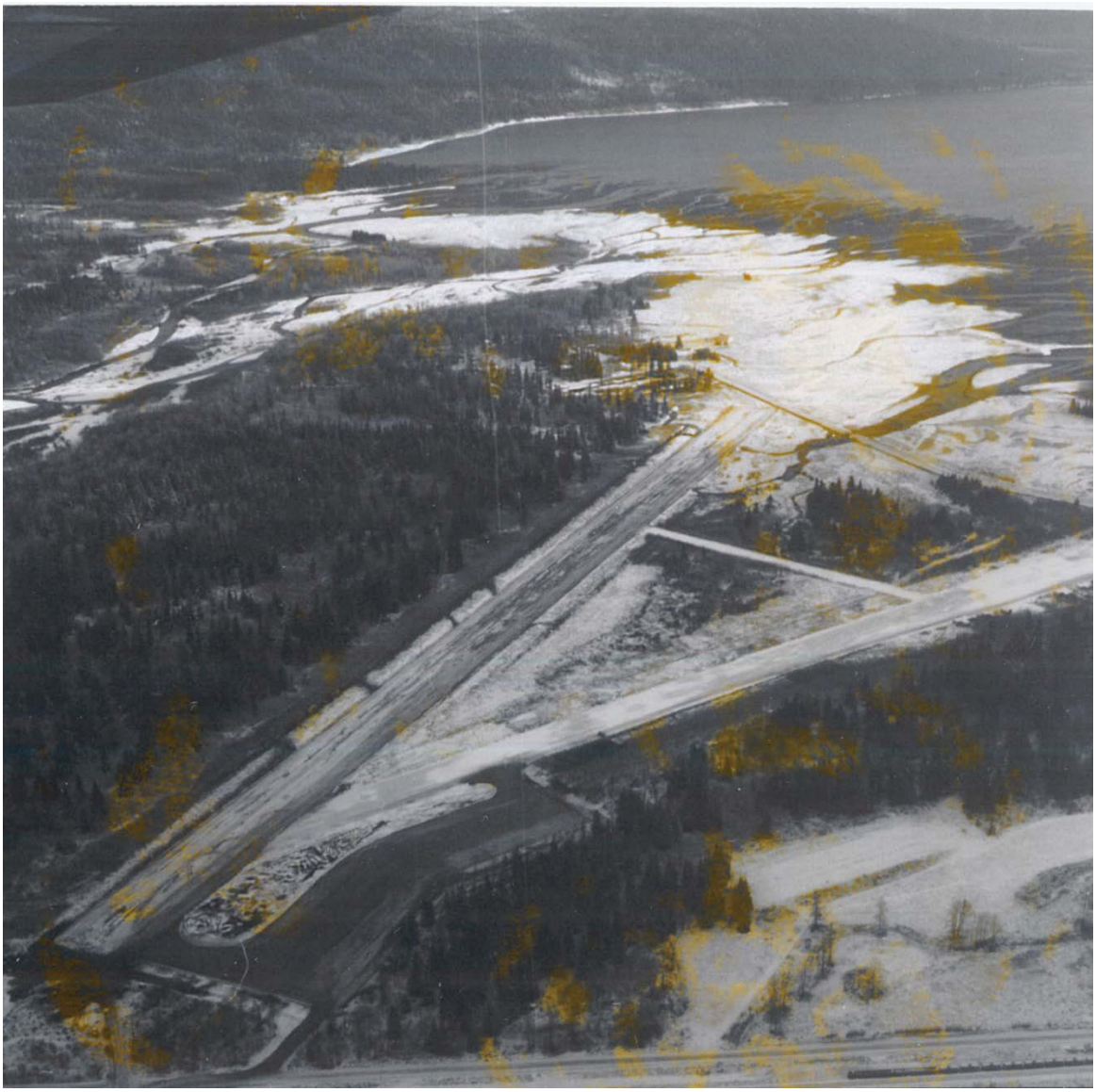

Figure 9: 1962 Aerial of Seward Airport following the construction of parking apron in the lower left quarter the photo. Photo from DOT&PF archives.

Figure 10: Overview of buildings on west side of Runway 16-34 on November 29, 1962. Photo from DOT&PF archives.

Figure 11. Overview of southern end of runway 13-31 after DOT&PF had 75% compaction from contractor in July 1966, facing southeast. Photo from DOT&PF archives.

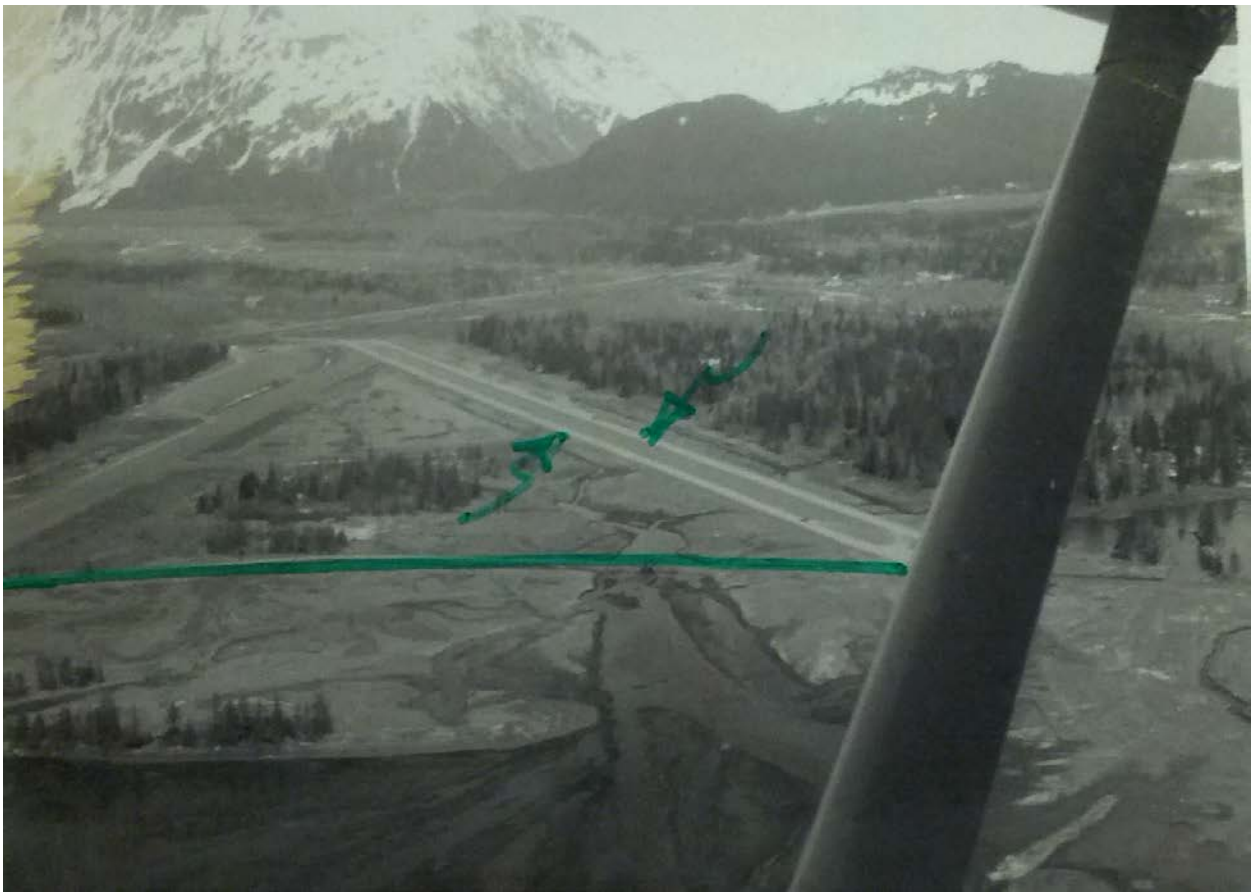

Figure 12: 1966 Aerial photo showing abandoned public road (line) and proposed haul routes (arrows) for extending runway 16-30. Photo from DOT&PF archives.

Figure 13. Location of Seward Naval Radio Station (SEW-00835) in relation to the southern end of runway 13-31 in May 1966. Note construction work to extend runway at left edge of photo. Photo from DOT&PF archives.

Figure 16: July 8, 1975, Overview of Seward Airport prior to runways, taxiways, and apron being surfaced with bituminous sealcoat. Photo from DOT&PF archives.

Figure 17: July 1975, top course seal operation in progress. Photo from DOT&PF archives.

Figure 18: July 21, 1975, work crew painting ‘33’ on runway 15-33 (today’s 16-34). Photo from DOT&PF archives.

Figure 19: July 1975, Overview of Seward Airport after runways, taxiways, and apron being surfaced with bituminous sealcoat. Photo from DOT&PF archives.

Figure 23. April 20, 2017 Photo of Seward airport SREB and sand shed.

Figure 24. Seward Airport. Cordova Airlines plane on runway. 1964. Image #2600.1.33 courtesy of Resurrection Bay Historic Society.

THE STATE of ALASKA
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June 14, 2018

File No.: 3130-1R FAA/2018-00112

Subject: Seward Airport Improvements, TBD/Z548570000

Michael Wanzenried
Department of Transportation & Public Facilities
PO Box 196900
Anchorage, AK 99519-6900

Dear Mr. Wanzenried,

The Alaska State Historic Preservation Office (AK SHPO) received your letter (dated June 5, 2018) on June 5, 2018. Following our review of your letter and the report titled *Determination of Eligibility Seward Airport (SEW-01625) Seward, Alaska,* our office provides the following comments on the determinations of eligibility for listing on the National Register of Historic Places (Table 1).

Table 1. Determinations of Eligibility

No.	AHRS#	Site Name	DOT&PF Determination	SHPO Comment
1	SEW-1625	Seward Airport	Not Eligible	Concur
2	SEW-0007	Russian Trail	Not Eligible	There is no need to evaluate the segment of trail from the south shore of the Resurrection River to Port Avenue because it is evident from your research that this segment, as shown in the AHRS mapper, has been destroyed or possibly followed a different route outside of the airport boundary. We will update the condition of the trail segment on the AHRS card as destroyed, with a note that the historic location description is unclear.

Additionally, we reviewed the subject undertaking pursuant to Section 106 of the National Historic Preservation Act. Following our review, we concur with your finding of no historic properties affected for the subject undertaking.

Please note that as stipulated in *36 CFR § 800.3*, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations. Please note that our comment letter does not end the 30-day review period provided to other consulting parties. Should unidentified cultural resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the NRHP eligibility criteria (*36 CFR § 60.4*) in consultation with our office.

Thank you for the opportunity to review and comment on the subject undertaking. Please contact Mark Rollins at 269-8722 or mark.rollins@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

Judith E. Bittner
Deputy State Historic Preservation Officer

JEB:mwr