Nanwalek & Port Graham Airport Project

Section 4(f) Evaluation

February 2013

SECTION 4(f) EVALUATION

NANWALEK AND PORT GRAHAM AIRPORT PROJECT

NANWALEK AND PORT GRAHAM, ALASKA

DOT&PF Project No. 52250

Prepared for:

United States Department of Transportation
Federal Aviation Administration
222 West 7th Avenue
Anchorage, Alaska 99513-7587

On behalf of the sponsor:

State of Alaska
Department of Transportation and Public Facilities
Central Region
P.O. Box 196900
Anchorage, Alaska 99519-6900

Prepared by:

DOWL HKM
4041 B Street
Anchorage, Alaska 99503

W.O. 59127

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TABLE OF CONTENTS

Page

TABLES

FIGURES

APPENDICES

LIST OF ACRONYMS

AASP ..... Alaska Aviation System Plan
ARC ..... Airport Reference Code
BIA ..... Bureau of Indian Affairs
CCC ..... Civilian Conservation Corps
CFR ..... Code of Federal Regulations
CRC ..... Cultural Resource Consultants LLC
DOT&PF ..... State of Alaska Department of Transportation and Public Facilities
EA ..... Environmental Assessment
FAA ..... Federal Aviation Administration
FAR ..... Federal Aviation Regulation
FHWA ..... Federal Highway Administration
MOA ..... Memorandum of Agreement
NRHP ..... National Register of Historic Places
NOTAM ..... Notice to Airmen
ROFA ..... Runway Object-Free Area
RPZ ..... Runway Protection Zone
RSA ..... Runway Safety Area
Secretary ..... Secretary of Transportation
SHPO ..... State Historic Preservation Office
U.S.C. ..... United States Code

1.0 SECTION 4(f) BACKGROUND AND PROPOSED ACTION

1.1 Section 4(f) Background

Section 4(f) of the Department of Transportation Act of 1996 (as amended), 49 United States Code (U.S.C.) §303(c), states:

> The Secretary (Secretary of Transportation) may approve a transportation program or project (other than any project for a park road or parkway under Section 204 of Title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if—
>
> (1) there is no prudent and feasible alternative to using that land; and
>
> (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

The Federal Aviation Administration (FAA) uses Federal Highway Administration (FHWA) regulations (23 Code of Federal Regulations [CFR] 774) as guidance in implementing Section 4(f) impact analysis and documentation. The term "feasible and prudent avoidance alternative" from the quotation above is defined by FHWA at 23 CFR 774.17:

> (1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
>
> (2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
>
> (3) An alternative is not prudent if:

(i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;

(ii) It results in unacceptable safety or operational problems;

(iii) After reasonable mitigation, it still causes:

(A) Severe social, economic, or environmental impacts;

(B) Severe disruption to established communities;

(C) Severe disproportionate impacts to minority or low income populations; or

(D) Severe impacts to environmental resources protected under other Federal statutes;

(iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;

(v) It causes other unique problems or unusual factors; or

(vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

1.2 Proposed Action

The communities of Nanwalek and Port Graham are located approximately 150 air miles southwest of Anchorage, Alaska, on the southernmost point of the Kenai Peninsula in Southcentral Alaska (Figures 1). The State of Alaska Department of Transportation and Public Facilities (DOT&PF) and the FAA are proposing to build a shared airport and airport access road between the communities of Nanwalek and Port Graham (Proposed Action) located 3.5 miles apart (Figure 2).

The Proposed Action would resolve airport deficiencies through the following actions (Figure 2):

- Construct a 3,300-by-60-foot runway;
- Construct a 3,780-by-120-foot RSA;
- Clear trees for a 3,780-by-400-foot ROFA;
- Construct a firm graded gravel runway, including a dust palliative;
- Construct a 25-foot-wide taxiway;
- Construct a 60,000-square-foot apron with a 30,000-square-foot lease lot support area;
- Construct a 2-bay heated snow-removal equipment building on the airport apron;
- Leave the construction contractor's office on the airport apron for a passenger waiting facility if the communities agree to take over responsibility;
- Clear trees for a 1,000-by-500-by-700-foot RPZ and approach surfaces;
- Install a runway lighting system, threshold marking, and runway midpoint sign;
- Construct 2-lane gravel roads totaling 3.5 miles long and 22.5 feet wide for Nanwalek and Port Graham residents to access the airport;
- Install 22 culverts underneath the proposed roads to accommodate drainage and streams;
- Reroute approximately 3,000 feet of stream around proposed new runway;
- Acquire 187 acres of land (132 acres for the airport and 55 acres for the access roads) to construct the airport, access roads, and maintain future land use compatibility; and
- Close old airports at Nanwalek and Port Graham.

2.0 PURPOSE AND NEED

The purpose of the Proposed Action is to provide a safe, reliable, and efficient shared airport for the communities of Nanwalek and Port Graham that meets Community Class Airport criteria identified in the DOT&PF Alaska Aviation System Plan (AASP) and current FAA Airport Reference Code (ARC) A-I design standards.

The existing Nanwalek and Port Graham airports do not meet current AASP Community Class Airport requirements and FAA standards for A-I aircraft as noted in Table 1 and described further in Appendix A of the Environmental Assessment (EA). Airport deficiencies at both existing Nanwalek and Port Graham Airports include:

- Inadequate runway length and width;
- Inadequate RSA;
- Inadequate ROFA;
- Soft and uneven runway;
- Lack of taxiway;
- Inadequate apron;
- Lack of runway lighting systems, runway markings, and signage;
- Numerous penetrations to the Federal Aviation Regulation (FAR) Part 77 surfaces;
- Non-compatible land use; and
- Inadequate wind coverage.

Additional airport deficiencies at the existing Nanwalek Airport include:

- Erosion-prone runway; and
- Non-compliant RPZ.

Additional airport deficiencies at the existing Port Graham Airport include:

- Existing structures penetrating the ROFA and building restriction line; and
- Close proximity to the landfill and sewage lagoon.

Table 1: Existing Conditions and Corrective Actions

Component		FAA Standard (ARC A-I)	Nanwalek Airport Existing Conditions	Port Graham Airport Existing Conditions	Corrective Action (ARC A-I)
Runway	Length and Width	3,300 ft x 60 ft	1,850 ft (NOTAM 900 ft closed) x 50 ft	1,975 ft x 45 ft	3,300 ft x 60 ft
	Safety Area Length and Width	3,780 ft x 120 ft	1,850 ft x 50 ft	2,325 ft x 80 ft	3,780 ft x 120 ft
	ROFA Length and Width	3,780 ft x 400 ft	1,850 ft x 50 ft	2,325 ft x 80 ft	3,780 ft x 400 ft
	Surface Type and Condition	Firm, graded runway	Gravel, sand, and rock (poor erosion, soft surface condition)	Gravel (fair-soft surface condition)	Firm, graded runway
Taxiway and Apron	Taxiway Width	25 ft	None	None	25 ft
	Apron Size	90,000 ft^2	None	12,800 ft^2	60,000 ft^2 plus a 30,000 ft^2 lease lot support area; A-I runway separation standards
	RPZ	1,000 ft x 500 ft x 700 ft	None	1,000 ft long; 500 ft wide at runway; 700 ft wide at far end (estimated)	1,000 ft x 500 ft x 700 ft
Miscellaneous	Lighting System	Runway lighting system	None	None	Runway lighting system
	Runway Marking, Signage	Threshold marking, runway midpoint sign	None	Reflective cones and markers	Threshold marking, runway midpoint sign
	Service Access	Below 15 ft elevation on ends of runway approach area	Secondary road within approach surface	Secondary road within approach surface	Two-lane gravel road totaling 3.5 miles in length, 22.5 ft wide, below 15 ft elevation on ends of runway approach area.
Airspace	FAR Part 77 Surfaces	Free of obstructions	Major penetrations to the approach, primary, transitional, horizontal and conical surfaces	Major penetrations to the approach, primary, transitional, horizontal and conical surfaces	Minimal or no penetrations

3.0 SECTION 4(f) PROPERTY

The Proposed Action area of potential effect and relationship to the Section 4(f) property are illustrated on Figure 2. The Section 4(f) property that would be adversely affected by the Proposed Action is the Port Graham-Nanwalek Civilian Conservation Corps Trail (CCC Trail; SEL-348). The CCC Trail was recommended as eligible under Criteria A and D by Cultural Resource Consultants LLC (CRC) and dates back to at least 1937. CRC's research found that the CCC Trail and its 19 bridges are associated with local, regional, and national events, and represent a type and time period that are poorly documented and of which there are few extant examples (CRC, 2010).

As detailed in CRC's *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* (2010), the CCC Trail has changed little since it was built in 1937, although portions of the trail are overgrown with vegetation and its bridges have deteriorated or have been slightly modified since original construction. The CCC Trail retains most of the seven aspects of historic integrity, is in its original location, and the setting and much of the materials and workmanship are intact. It still has the essential features expressive of its design and function, and these features are visible enough to convey their significance (CRC, 2010). Additional rationale for CRC's eligibility recommendations is provided below.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old and was used throughout most of the twentieth century. It is associated with the development of the villages of Port Graham and Nanwalek and with the cannery period in the region. The CCC Trail's long history, and function as the only constructed land route between Port Graham and Nanwalek, are significant enough to qualify it under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The Port Graham-Nanwalek CCC Trail and its bridges represent a type and time period that are poorly documented and of which there are few examples still in existence. Documentation of 19 bridges is sufficient to reveal patterns

> of design and construction. These patterns can then be compared to information from other log and timber bridges of this era. CRC believes that the Port Graham-Nanwalek CCC Trail meets the significance requirements for Criterion D for its ability to yield important information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula.

The DOT&PF and FAA agreed that the CCC Trail is eligible for the National Register of Historic Places (National Register) under Criterion A at the local and regional levels, but questioned whether Criterion D applied. The State Historic Preservation Office (SHPO) stated that there was not enough information to determine whether Criterion D applies and that this question can be clarified through the MOA process of resolving the adverse effects.

4.0 IMPACTS TO THE SECTION 4(F) PROPERTY

According to 23 CFR 774.17, the implementing regulations for Section 4(f) impact analysis and documentation, "use" of a Section 4(f) property occurs:

(1) when land is permanently incorporated into a transportation facility;

(2) when there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose as determined by the criteria in Section 774.13(d); or

(3) when there is a constructive use of a Section 4(f) property as determined by the criteria in Section 774.15.

The proposed Nanwalek and Port Graham Airport project would incorporate a Section 4(f) property into a transportation facility; therefore, Section 4(f) is triggered under criteria (1) above.

Pursuant to 36 CFR 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, the FAA has found, and the SHPO has concurred, that the Proposed Action would adversely affect the CCC Trail. Therefore, Section 4(f) applies to this federal undertaking.

Following is a discussion of the impacts that the Proposed Action would have on the CCC Trail.

4.1 Analysis of Potential Section 4(f) Impacts

Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed 100-foot wide airport access road right-of-way between Port Graham and Nanwalek in the western half of the study area (Figure 2). The proposed 22-foot-wide airport access road crosses the CCC Trail three times. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed. Cutting and filling in the two locations where the proposed airport access road intersects the CCC Trail would likely erase evidence of the trail and at least six of its 19 bridges. The proposed airport access road would disconnect these two previously undisturbed sections of trail, and would dramatically alter the CCC Trail's integrity.

Accordingly, the proposed airport access road would have an adverse effect on the attributes that make the CCC Trail eligible for listing on the National Register. A Section 4(f) evaluation is required to provide sufficient supporting documentation to demonstrate that there is no feasible and prudent avoidance alternative and also to demonstrate that all possible planning to minimize harm to the CCC Trail has occurred.

5.0 FEASIBLE AND PRUDENT ALTERNATIVES

The Proposed Action Alternative is the only alternative to be fully assessed in this Section 4(f) Evaluation. As demonstrated in Section 5.1, no other feasible and prudent alternatives are available for this project.

5.1 Alternatives Considered and Dismissed

Feasible and prudent alternatives to avoid the Section 4(f) property must meet the proposed project's purpose and need. The term "prudent" refers to rationale judgment. Under FAA Order 5050.4B, paragraph 1007.e(5)(a), a project can be eliminated if it might be feasible or technically possible, but not rational when one considers its safety, policy, environmental, social, or economic consequences. Factors used to evaluate if an alternative is prudent are shown in Table 2 as defined in 23 CFR 774.17.

Table 2: Alternative Evaluation Factors

Factors used to evaluate if an alternative is prudent:
(A) Does the alternative compromise the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need?
(B) Does the alternative cause unacceptable safety or operational problems?
(C) Does the alternative cause severe social, economic, or environmental impacts after reasonable mitigation?
(D) Does the alternative cause severe disruption to established communities after reasonable mitigation?
(E) Does the alternative cause severe disproportionate impacts to minority or low income populations after reasonable mitigation?
(F) Does the alternative cause severe impacts to environmental resources protected under other federal statutes after reasonable mitigation?
(G) Does the alternative result in additional construction, maintenance, or operational costs of an extraordinary magnitude?
(H) Does the alternative cause other unique problems or unusual factors?
(I) Does the alternative involve multiple factors listed above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude?

After thorough consideration of a number of airport location and road alignment alternatives, the DOT&PF and FAA determined that the only alternative that would meet the project purpose and need is the Proposed Action. Because the existing Nanwalek and Port Graham airport sites do not have adequate space to accommodate upgrades compliant with DOT&PF and FAA standards, and reconstructing the existing airports would not be prudent, several other airport locations were analyzed. These airport locations, and the rational for dismissing them, are described further in the EA. The preferred airport location identified in the Proposed Action requires a new access road. Five road alignments for airport access were analyzed Table 3. Road alignments 1, 2, 4, and 5 were determined not to be prudent due to a number of factors, including failure to meet the project purpose and need; safety and operational problems; severe social, economic, or environmental impacts; severe disruption to established communities; severe impacts to environmental resources protected under other federal statutes; and additional construction, maintenance, or operational costs of an extraordinary magnitude. Table 3 summarizes road alignment alternatives that were considered during preliminary design, but were determined not to be prudent alternatives and were dismissed from consideration.

Table 3: Alternatives Evaluation

Alternative	Description	Rationale for Dismissing Alternative and Associated Factors	
Road Option 1 (Figure 3)	Proposed road extends from Nanwalek landfill, along the bluffs of the Port Graham coast, south of the proposed airport, then ties into the existing Windy Bay logging road.	Near the community of Nanwalek, the terrain consists of steep slopes and coastal cliffs. Because of these constraints, alignment options on the west side of the project area are limited. In order to avoid impacting the Nanwalek watershed and reservoir, the alignment for Road Option 1 would begin at the north end of the community. Starting the road alignment at this location would require bisecting the Nanwalek landfill. The landfill would need to be relocated and the landfill contents removed before the road alignment could be constructed. East of the landfill, the road alignment would need to climb very steep slopes and traverse directly above adjacent coastal cliffs in order to reach the new airport location. The alignment would require grades of 10% for over 3,500 feet. Steep grades of 10% over long distances are considered unsafe, particularly when associated with adjacent cliffs, roadway curves, and winter driving conditions. In addition, due to the steep slopes and adjacent cliffs, substantial road cuts would be required to maintain a maximum 10% grade and to move the alignment back from hazardous drop-offs. Substantial road cuts would increase erosion, require rock catchment areas which add additional safety concerns, result in very high construction and maintenance costs, and have a considerable impact on the topography and visual quality of the area. At the eastern project limits, the proposed road would bisect a primary stream feeding the Port Graham Reservoir, the only drinking water source for Port Graham. The community of Port Graham has voiced strong opposition to bisecting this stream with a road. The proposed road near the Port Graham end would also be within FAR Part 77 terrain obstruction surfaces for aircraft approaches and departures.	Table 2, bullet (A) Table 2, bullet (B) Table 2, bullet (C) Table 2, bullet (D) Table 2, bullet (F) Table 2, bullet (G)

Alternative	Description	Rationale for Dismissing Alternative and Associated Factors	
Road Option 2 (Figure 3)	Proposed road extends from Nanwalek landfill, along the bluffs of the Port Graham coast, north of the proposed airport, then ties into the existing Windy Bay logging road.	Similar to Road Option 1, the alignment for Road Option 2 would start at the north end of Nanwalek, bisecting the landfill. The road would follow the same steep alignment, with grades of 10% for over 3,500 feet. Steep slopes and adjacent cliffs would require substantial road cuts to maintain a maximum 10% grade and to move the alignment back from hazardous drop-offs. Substantial road cuts would increase erosion, add additional safety concerns, result in much higher construction and maintenance costs, and impact the topography and visual quality of the area. At the eastern project limits, the proposed road would also bisect a primary stream feeding the Port Graham Reservoir. The proposed road near the Port Graham end would also be within Part 77 terrain obstruction surfaces for aircraft approaches and departures.	Table 2, bullet (A) Table 2, bullet (B) Table 2, bullet (C) Table 2, bullet (D) Table 2, bullet (F) Table 2, bullet (G)
Road Option 3 (part of Proposed Action; Figure 3)	Proposed road extends from the existing Nanwalek road, along the hillside, north of the proposed airport and Port Graham reservoir, then ties into the existing Windy Bay logging road.	Carried forward for further evaluation.	-
Road Option 4 (Figure 3)	Same proposed road alignment as Road Option 3, but with a one-lane road where the road alignment would cross the CCC Trail.	The area of the one-lane road would have severe safety concerns due to poor visibility and sighting of turnouts. This area also has a 10% grade and, due to the steep terrain, rock catchment areas would be required adding an additional measure of safety concerns with a one-lane road.	Table 2, bullet (A) Table 2, bullet (B)
Road Option 5	No-Action Alternative	Users of both Nanwalek and Port Graham Airports would continue to use deficient facilities that do not meet FAA design and safety standards, including runway length, apron and taxiway design, lighting, marking, and signage.	Table 2, bullet (A) Table 2, bullet (B)
Reconstruct Existing Airports	Reconstruct the existing Port Graham Airport and Nanwalek Airport in their respective existing locations.	Port Graham Airport location only able to accommodate a 2,200-foot runway. Approximately forty-five private or community structures within the existing ROFA. Nanwalek Airport location would have major environmental issues related to placing fill in an intertidal coastal zone. High construction and maintenance costs to build and maintain separate airports.	Table 2, bullet (A) Table 2, bullet (C) Table 2, bullet (D) Table 2, bullet (F) Table 2, bullet (G)

5.2 Alternatives Considered for Further Evaluation

5.2.1 Proposed Action

The Proposed Action would meet the project purpose and need by rectifying deficiencies with and complying with AASP Community Class Airport requirements and FAA ARC specifications through the actions detailed in Section 1.2.

Under the Proposed Action, the new airport and access road alignment (Road Option 3) would avoid important drainages that contribute to the Port Graham water source and would not impact the Nanwalek watershed and reservoir. Road Option 3 would connect to an existing road in Nanwalek at a higher elevation, compared to Road Options 1 and 2, and would utilize approximately 3,443 feet of the existing CCC trail alignment. By starting the alignment at a higher elevation and using the flatter terrain that the CCC trail currently follows, steep alignment grades would be greatly reduced and substantial road cuts would be minimized. The reduction in steep grades and road cuts would reduce construction and maintenance costs and result in a roadway that is feasible to construct. In addition, construction of a shared airport would reduce costs and maintenance, compared to constructing two new community airports.

The Proposed Action would also address identified safety needs. DOT&PF AASP Community Class and FAA standards were developed to improve operational safety during takeoff and landing and in the event of an aircraft excursion from a runway. The improvements described in the Proposed Action would provide adequate runway length and orientation for planes to safely land and takeoff, reduce the potential for damage to an aircraft that veers off the runway, and provide access for aircraft rescue and firefight equipment response. In addition, the access road alignment (Road Option 3) would require grades of 10% for approximately 1,800 feet (compared to 3,500 feet under Options 1 and 2), would be located further upslope and away from the steeper terrain and cliffs near the coast, and would require less roadway cut as compared to Road Options 1 and 2. Therefore, Road Option 3 would reduce safety issues associated with constructing a new access road alignment in steep terrain.

Overall, the Proposed Action is feasible, and it is also a prudent alternative when evaluated using the criteria listed in Table 2.

- The Proposed Action would not cause unacceptable safety or operational problems; cause severe social, economic, or environmental impacts; cause disruption to established communities; cause severe disproportionate impacts to minority or low income populations; or cause additional construction, maintenance, or operational costs of an extraordinary magnitude.
- The Proposed Action would not result in an accumulation of factors that collectively would have an adverse impact that directly would impact the safety of current and future users of the airport facility.

The FAA has determined that there are no prudent and feasible alternatives that avoid use of the Section 4(f) property. Furthermore, the Proposed Action is the only alternative that meets the project purpose and need. Because there are no other prudent and feasible alternatives, a comparative analysis of feasible and prudent alternatives was not conducted for this Section 4(f) Evaluation.

6.0 MEASURES TO MINIMIZE HARM

Per 23 CFR 774.3, if there are no feasible and prudent alternatives that avoid the Section 4(f) property, then the Administration may approve, from among the remaining alternatives that use the Section 4(f) property, only the alternative that causes the least overall harm to the Section 4(f) property. The factors to be considered for an analysis of harm relative to a Section 4(f) property are defined in 23 CFR 774.3 (c)(1). Given that the Proposed Action is the only alternative that is feasible and prudent to construct, a least overall harm analysis was not conducted for this Section 4(f) Evaluation.

6.1 Minimization Measures through the Memorandum of Agreement

To resolve the adverse effects to the CCC Trail, a Memorandum of Agreement (MOA) was developed in consultation with the SHPO, the BIA, the Port Graham Village Council, and the Nanwalek IRA Council and the regional and local Native corporations. The MOA outlines measures and responsible parties to mitigate the adverse effects. The DOT&PF and BIA are invited signatories, and Nanwalek and Port Graham Tribal Councils and the local and regional Native corporations are concurring parties to the MOA. The MOA signatories (the FAA and the SHPO), the invited signatories, and concurring parties all signed the MOA. The MOA is included in Appendix A.

As part of the MOA, the FAA and the DOT&PF shall ensure that the following stipulations are implemented:

6.1.1 Interpretive Display

(1) The DOT&PF shall provide an interpretive display and install it at the shared Nanwalek and Port Graham Airport apron. The theme and design of the display shall be developed in consultation with the SHPO, Bureau of Indian Affairs (BIA), the Tribes, and other concurring parties to the MOA, and shall use a Department of Natural Resources standard interpretive sign design.

(2) The DOT&PF shall submit the graphics, text, and design of the draft interpretive display to the SHPO, BIA, the Tribes, and other concurring parties to the MOA within 12 months of the execution of the MOA. The SHPO and other parties shall have 30 days from the receipt of the DOT&PF

submittals to review and comment. The DOT&PF shall take into account any comments received during the review period, and submit the final interpretive display design to the MOA parties no later than 6 months after the DOT&PF received review comments.

(3) The DOT&PF shall provide written verification to the SHPO that includes photographic documentation of the installed interpretive display prior to completion of the airport construction project.

(4) The interpretive display shall be maintained by the DOT&PF.

6.1.2 Civilian Conservation Corps in the Chugach National Forest Report

(1) The DOT&PF shall develop a booklet for the general public to provide a better historic context on the CCC development and management and the use of Port Graham-Nanwalek CCC trail and other trails within the Chugach National Forest. The report would be designed in the BIA Legacy Series format. The theme and design shall be developed in consultation with the SHPO, BIA, and the Tribes.

(2) The DOT&PF shall submit the draft report to the SHPO, BIA, the Tribes, and other concurring parties to the MOA within 12 months of the execution of the MOA. The SHPO and other parties shall have 30 days from the receipt of the DOT&PF submittals to review and comment. The DOT&PF shall take into account any comments received during the review period, and submit the final interpretive display design to the MOA parties no later than 6 months after the DOT&PF received review comments.

(3) The DOT&PF shall print 100 booklets and provide the SHPO and BIA with 10 copies and 5 copies to each of the concurring parties.

7.0 CONCLUSION AND FINDINGS

The FAA and DOT&PF have considered all feasible and prudent alternatives meeting the project's purpose and need that avoid using the Section 4(f) property.

Section 4(f) states, subject to exceptions for *de minimis* impacts, the Secretary may approve a transportation program or project requiring the use of publicly-owned land of a park, recreational area, or wildlife and waterfowl refuge of national, state, or local significance or land of a historic site of national, state, or local significance as determined by the official having jurisdiction over those resources only if:

- there is no prudent and feasible alternative that would avoid using those resources; and
- the program or project includes all possible planning to minimize harm resulting from the use.

The FAA and the DOT&PF have determined that:

(1) There are no feasible or prudent alternatives that avoid using or adversely affecting the Section 4(f) property. With the exception of the Proposed Action, all alternatives were determined to be infeasible and not to be prudent due to a number of factors, including failure to meet the project purpose and need; safety and operational problems; severe social, economic, or environmental impacts; severe disruption to established communities; severe impacts to environmental resources protected under other federal statutes; and additional construction, maintenance, or operational costs of an extraordinary magnitude.

(2) The Nanwalek and Port Graham Airport Project has included all possible planning to minimize harm resulting from the physical use and adverse effect to the Section 4(f) property and has developed a mitigation plan to resolve the adverse effect to the CCC Trail through the implementation of measures in an MOA.

8.0 RECORD OF COORDINATION

Table 4 lists coordination efforts conducted in support of this Section 4(f) Evaluation. Appendix B contains copies of correspondence.

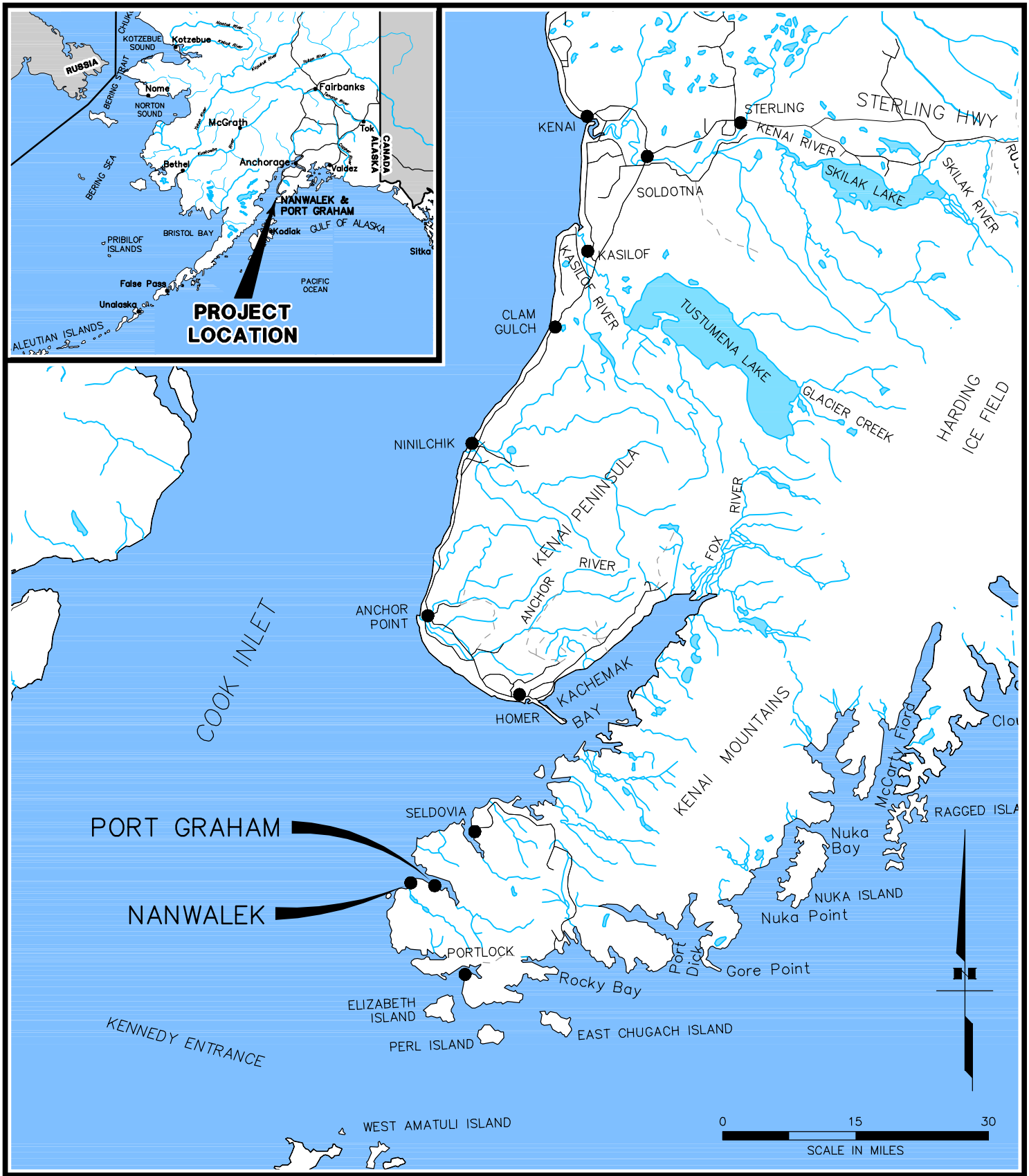
Table 4: Record of Coordination Relative to the Section 4(f) Property

Date	Activity	Description
July 22, 2011	Finding of Adverse Effect Letter (for Proposed Action)	The DOT&PF sent a Finding of Adverse Effect Letter to the SHPO, BIA, Native Village of Nanwalek, English Bay Corporation, Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and Chugachmuit.
August 1, 2011	SHPO Concurrence with Finding of Adverse Effect	The SHPO responded to the DOT&PF concurring with the determination of eligibility under Criterion A and with the finding of Adverse Effect for the CCC Trail.
August 19, 2011	Finding of Adverse Effect Letter (for proposed geotechnical and survey fieldwork in support of the Proposed Action)	The DOT&PF sent a Finding of Adverse Effect Letter to the SHPO specifying proposed land surveying, geotechnical drilling, and geophysical surveys.
August 31, 2011	Finding of Adverse Effect Letter (for Proposed Action)	The DOT&PF re-sent the Finding of Adverse Effect Letter dated July 22, 2011 to the Native Village of Nanwalek, English Bay Corporation, Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and Chugachmuit since the majority of parties indicated they did not receive the Finding of Adverse Effect Letter sent July 22, 2011.
September 27, 2011	Finding of Adverse Effect Letter (for Proposed Action)	The FAA sent a Finding of Adverse Effect Letter to the Advisory Council on Historic Preservation.
August 2011-September 2012	MOA developed in consultation with consulting parties.	The DOT&PF and FAA coordinated with all consulting parties to develop measures to resolve adverse effects to the CCC Trail and to minimize harm to the Section 4(f) resource.
October 16, 2012	MOA Transmittal	The FAA sent the Advisory Council on Historic Preservation a copy of the executed MOA.

9.0 REFERENCES

CRC LLC. 2010. L.F. Yarborough and S.J. Meitl. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*.

FIGURES



Vicinity Map

Nanwalek Port Graham Airport Project

T 9,10 S, R 15,16 W

Seward Meridian, Alaska

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

DOT&PF Project No. 52250
Nanwalek Port Graham Airport

Nanwalek & Port Graham, Alaska

DATE: AUGUST 2011 | FIGURE 1

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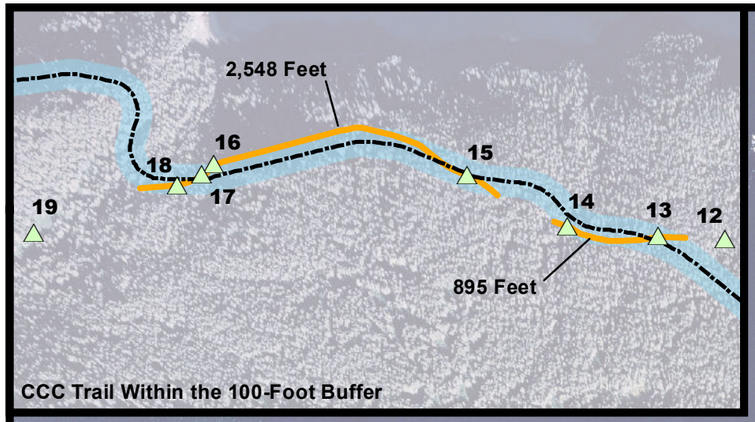

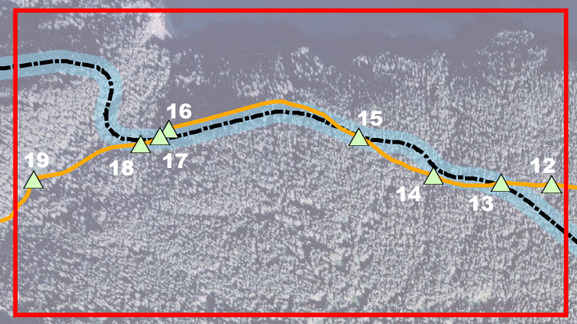

Legend

- Existing Bridges
- Existing Port Graham-Nanwalek CCC Trail (SEL-348)
- Proposed Road
- Proposed Airport
- 100-Foot Buffer

Port Graham-Nanwalek CCC Trail
Area of Potential Effect

T 09 S, R 15&16 W
Seward Meridian, Alaska

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

DOT & PF Project No. 52250

Nanwalek Port Graham Airport

Nanwalek & Port Graham, Alaska

December 2012 | Figure 2

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NANWALEK

PORT GRAHAM

WINDY BAY
LOGGING ROAD

0 1500 3000
SCALE IN FEET

LEGEND

- PROPOSED AIRPORT
- ROAD OPTION 1
- ROAD OPTION 2
- ROAD OPTION 3 & 4
- EXISTING CCC TRAIL

ROAD OPTIONS

T 9,10 S, R 15,16 W

Seward Meridian, Alaska

TRANSPORTATION & PUBLIC FACILITIES · STATE OF ALASKA ·

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

DOT & PF Project No. 52250
Nanwalek Port Graham Airport

Nanwalek & Port Graham, Alaska

DATE: DECEMBER 2012 | FIGURE 3

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APPENDIX A

Memorandum of Agreement

Memorandum of Agreement
between the
Federal Aviation Administration
and the Alaska State Historic Preservation Officer
Regarding the Nanwalek and Port Graham Airport
at Nanwalek and Port Graham, Alaska
State Project No. 52250

WHEREAS, the Federal Aviation Administration (FAA) Alaskan Region Airports Division, in cooperation with the Alaska Department of Transportation and Public Facilities (DOT&PF) Central Region, an applicant for federal assistance, proposes to construct a shared airport and access road in between the communities of Nanwalek and Port Graham, Alaska (as shown in Figures 1 and 2) to resolve operational deficiencies and to meet current FAA standards (undertaking); and

WHEREAS, FAA has determined that the Port Graham-Nanwalek Civilian Conservation Corps (CCC) Trail (SEL-348) is eligible for the National Register of Historic Places (NRHP); and

WHEREAS, FAA has determined that the undertaking will have an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348); and

WHEREAS, FAA consulted with Alaska State Historic Preservation Officer (SHPO) in accordance with Section 106 of the National Historic Preservation Act (NHPA) (U.S.C. 470s) and 36 CFR 800; and

WHEREAS, FAA has invited the Advisory Council on Historic Preservation (Advisory Council) to participate and they have chosen to not to be party to this Memorandum of Agreement (MOA); and

WHEREAS, FAA consulted with the Bureau of Indian Affairs (BIA), pursuant to 36 CFR 800; and

WHEREAS, BIA as the federal land manager agency with fiduciary oversight of the Native allotments and having the authority to issue the Revocable Use Permits for the geotechnical and survey work on the Native allotments is an Invited Signatory to this MOA; and

WHEREAS, FAA consulted with the Nanwalek IRA Council and the Port Graham Village Council pursuant to 36 CFR Section 800.2(c)(2), who are Concurring Parties to this MOA; and

WHEREAS, FAA consulted with the Port Graham Corporation and Chugachmiut pursuant to 36 CFR Section 800.2(c)(5), who are Concurring Parties to this MOA; and

WHEREAS, the existing public use Nanwalek Airport, which is owned and managed by DOT&PF, would be closed after the new Nanwalek and Port Graham Airport is constructed, and operations commence at the new airport; and

WHEREAS, DOT&PF has no plans to dispose of the existing Nanwalek Airport and will retain the property in State ownership without any proposed improvements until such time that DOT&PF notifies the public of the proposed action and receives FAA determination of compliance with National Environmental Policy Act and all other applicable environmental laws and regulations ; and

WHEREAS, DOT&PF as project sponsor participated in consultation pursuant to 36 CFR 800 is an Invited Signatory to this MOA, and shall be responsible to administer and implement the stipulations under the terms of the MOA for and as directed by FAA; and

NOW, THEREFORE, FAA, SHPO, BIA, and DOT&PF (collectively the "Signatories") agree that the undertaking shall be implemented in accordance with the following stipulations in consideration of the effects this undertaking will have on the Port Graham-Nanwalek CCC Trail (SEL-348).

STIPULATIONS

The FAA, in coordination with DOT&PF, shall ensure that the following stipulations are implemented:

I. Mitigation Measures

A. Interpretive Display

1. The DOT&PF shall provide an interpretive display and install it at the shared Nanwalek and Port Graham Airport apron. The theme and design of the display shall be developed in consultation with SHPO, BIA, the Tribes, and other concurring parties to this MOA, and shall use a Department of Natural Resources standard interpretive sign design.
2. The DOT&PF shall submit the graphics, text and design of the draft interpretive display to SHPO, BIA, the Tribes, and other concurring parties to this MOA within twelve (12) months of the execution of this MOA. The SHPO and other parties shall have thirty (30) days from receipt of DOT&PF submittals to review and comment. The DOT&PF shall take into account any comments received during the review period, and submit the final interpretive display design to the MOA parties no later than six (6) months after DOT&PF received review comments.
3. The DOT&PF shall provide written verification to SHPO that includes photographic documentation of the installed interpretive display prior to completion of the airport construction project.
4. The interpretive display shall be maintained by DOT&PF.

B. Civilian Conservation Corps (CCC) in the Chugach National Forest Report

1. The DOT&PF shall develop a booklet for the general public to provide a better historic context on the CCC development and management, and the use of Port Graham-Nanwalek CCC Trail and other such trails within the Chugach National Forest. The report would be designed in the BIA Legacy Series format. The theme and design shall be developed in consultation with SHPO, BIA, and the Tribes.

2. The DOT&PF shall submit the draft report to SHPO, BIA, the Tribes, and concurring parties to this MOA within twelve (12) months of the execution of this MOA. The SHPO and other consulting parties shall have thirty (30) days from receipt of DOT&PF submittals to review and comment. The DOT&PF shall take into account any comments received during the review period, and submit the final report to the MOA parties no later than six (6) months after DOT&PF received review comments.
3. The DOT&PF shall print 100 booklets and provide SHPO and BIA with 10 copies, and 5 copies to each of the concurring parties.

II. Treatment of Human Remains

A. Although unlikely to be encountered, any and all human remains shall at all times be treated with dignity and respect. Should human remains be encountered, work will be stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify the Alaska State Troopers (AST), FAA, and SHPO. If the human remains are determined or believed by investigators to be Native, local Tribes shall be notified immediately. See Appendix A for specific contact information for Agency and Tribal Officials involved with human remains consultation.

B. If the remains appear recent, FAA and DOT&PF shall defer to the opinion of AST and/or the State Medical Examiner (SME) for a determination of whether the remains are of a forensic nature and/or subject to criminal investigation.

C. A physical anthropologist experienced in the analysis of human remains shall examine the human remains to determine racial identity. The physical anthropologist shall document, analyze, and photograph the remains so that an independent assessment of racial identity can be made. The physical anthropologist shall be afforded no more than thirty (30) days time to conduct his or her analysis.

D. If the human remains are not Native American, and a determination has been made by AST and SME that a death investigation is not warranted, then FAA and DOT&PF in consultation with SME, will identify, locate and inform descendants of the deceased. If no descendants are found, any necessary permits from the Alaska State Bureau of Vital Statistics will be obtained and the remains re-interred in a designated area.

E. Should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001) be encountered, work shall be

stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify FAA, SHPO, the Nanwalek Tribal Council, and the Port Graham Tribal Council.

III. Inadvertent Discoveries

If, during the implementation of the undertaking, a previously unidentified historic property is encountered, or a previously identified historic property is affected in an unanticipated manner, DOT&PF shall consult with FAA, SHPO, the Nanwalek Tribal

Council, the Port Graham Tribal Council, ANCSA Corporations, and other consulting parties as appropriate pursuant to 36 CFR 800.13. The DOT&PF will ensure that work shall cease in the area of the discovery until the previously unidentified historic property or unanticipated effect can be evaluated, and an appropriate treatment plan consistent with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716) is developed and agreed upon by SHPO. The DOT&PF shall insure that the treatment plan is implemented.

IV. Review

The Signatories shall review this MOA two (2) years from its execution date and every year thereafter until all measures are completed or until four (4) years from its execution date. The DOT&PF shall submit a biannual letter status update to MOA Signatories one (1) month prior to the biannual review and annually thereafter. Any amendments to this MOA recommended during the review shall be considered in accordance with CFR 800.6(c)(7). If the review results in a recommendation to terminate the MOA, termination of the MOA shall be considered in accordance with 36 CFR 800.6(c)(8).

V. Dispute Resolution

A. Should any Signatory to this MOA object in writing to the other Signatories regarding any action carried out or proposed with respect to the implementation of this MOA, consultation among the signatories shall be initiated to resolve the objections.

B. If FAA determines that the Section 106 related objection cannot be resolved through consultation, it shall request the further comments or staff level recommendations from ACHP pursuant to 36 CFR 800.6(b). Any ACHP comment provided in response to such a request will be taken into account by FAA in accordance with 36 CFR 800.6(c)(2).

C. At any time during implementation of any stipulation in this MOA, should an objection to any such stipulation or its manner of implementation be raised by a member of the public, FAA shall take the objection into account and consult as needed with the objecting party and parties to this agreement to address the objection.

VI. Amendment

Any Signatory to this agreement may request that this MOA be amended, whereupon they shall consult in accordance with 36 CFR § 800.6(c)(7) to consider such amendment. Amendments shall be executed in the same manner as the original MOA.

VII. Duration

This MOA shall continue in full force and effect until all measures for are completed or until four (4) years from its execution date. At any time DOT&PF may request FAA and SHPO in writing to review DOT&PF's project schedule and consider an extension or modification of this MOA. No extension or modification shall be effective unless all Signatories to the MOA have agreed to it in writing.

VIII. Termination

Any Signatory to this MOA may terminate it by providing thirty (30) days written notice to the other Signatories. The Signatories will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FAA will again seek the comments of the Advisory Council, pursuant to 36 CFR 800.7(c).

Execution and Implementation of this Memorandum of Agreement evidences that FAA has consulted with the SHPO and other consulting parties on the Nanwalek and Port Graham Airport Project and its effects on historic properties, and has taken into account the undertaking's effects on historic properties, and satisfied Section 106 responsibilities.

SIGNATORIES:

FEDERAL AVIATION ADMINISTRATION

By: _____ Date: 9/17/12
Byron Huffman, Alaskan Region Airports Division Manager

ALASKA STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-18-12
Judith Bittner, State Historic Preservation Officer

INVITED SIGNATORIES:
BUREAU OF INDIAN AFFAIRS

By: _____ Date: 9-18-2012
Eugene Virden, Regional Director

ALASKA DEPARTMENT OF TRANSPORATION & PUBLIC FACILITIES

By: _____ Date: 9.13.12
Robert A. Campbell, P.E., Central Region Director

CONCURRING PARTIES:

NANWALEK IRA COUNCIL

By: _____ Date: 9-24-12

John Kvasnikoff, 1st Chief

PORT GRAHAM VILLAGE COUNCIL

By: _____ Date: 9-26-12

Patrick Norman, Chief

PORT GRAHAM CORPORATION

By: _____ Date: 10-12-12
Lloyd Stiassny, President

CHUGACHMIUT

By: _____ Date: 10/5/12

Angela "Jan" Vanderpool, Executive Director

Appendix A

APPENDIX B

Consulting Parties Correspondence

Page

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek and Port Graham Airport and Access Road Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF, on behalf of the FAA, finds an adverse effect on historic properties by the proposed project.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations.

Relocation of the existing airports was explored in site reconnaissance studies, which evaluated seven other potential locations. After consultation with the communities, a shared airport at Romanoff Point was chosen as the only build alternative to be carried forward for further analysis in the National Environmental Policy Act (NEPA) document.

Project Description

The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. This has changed from the initiation letter sent on June 28, 2010 that stated a 75-foot wide runway would be constructed. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither

community is accessible by road, but the communities are linked to each other by two walking trails, one of which is impassible. The proposed project would require acquisitions of portions of native allotments and village corporation lands. Pending approvals of the proposed project, including NEPA document and permit acquisitions, funding, and property acquisition, construction could begin as early as 2014. Pre-NEPA approvals are also required such as Revocable Use Permits (RUP) from the Bureau of Indian Affairs (BIA) for geotechnical and survey work on native allotments.

Area of Potential Effect

The communities of Port Graham and Nanwalek are located on the southwestern end of the Kenai Peninsula near the entrance to Kachemak Bay off Cook Inlet. The villages are approximately three air miles apart and have been connected over the years by two trails, the Homer Electric Association (HEA) Trail, which is also sometimes called the "walking trail," and the now relatively unused Port Graham–Nanwalek Civilian Conservation Corps Trail (CCC Trail).

The original study area, surveyed for cultural resources in 2008 and 2009, consisted of the proposed access road 200-foot right-of-way (ROW) and the proposed airport property with a surrounding 1,000-foot wide buffer. The project design was later refined and with more accurate topographic information the Area of Potential Effect (APE) was later identified in the fall of 2009 to include all areas that might require ground-disturbing work (Figure 4). The APE consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer. The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design.

Identification Efforts

Cultural Resource Consultants LLC (CRC) conducted the cultural resources study for the study area, (the *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* (November 2010) is enclosed). The pre-survey literature search, limited to the immediate Nanwalek area and the southwest coast of Port Graham Bay, yielded information on 16 sites within 0.75 mile of the proposed project area (Figure 3). All sites are either along the ocean coast or adjacent to salmon streams. These Alaska Heritage Resources Survey (AHRS) sites are:

- SEL-003, the remains of the Russian American Company post, Alexandrovsk Redoubt, located under the existing Nanwalek runway on the spit just south of Nanwalek in English Bay, roughly five miles south of the entrance to Kachemak Bay, on the east shore of Cook Inlet;
- SEL-018, the Saints Sergius and Herman of Valaam Church, within the village of Nanwalek;
- SEL-027, the Port Graham Village Cannery Site, located on the south shore of Port Graham, which contains a prehistoric component, as well as the historic cannery component;
- SEL-161, the Moonin Midden, located on the Sergius Moonin Allotment just west northwest of Port Graham Village;
- SEL-166, the Anahonak Midden, located near the head Port Graham Bay, about 2 miles southwest of Port Graham Village;
- SEL-170, the location of a partial human cranium, found north of Nanwalek and west of Russian Point;

- SEL-229, a campsite, roughly 0.5 mile southeast of Nanwalek on the English Bay River;
- SEL-230, site Area #2 Logging Unit, on the west bank of the English Bay River, upstream from the lagoon;
- SEL-231, a largely unknown, sub-surface site of ash and charcoal, on a beach ridge on the east shore of English Bay lagoon;
- SEL-232, a small midden on the south shore of English Bay Lagoon;
- SEL-238, the Sarjus Kvasnikoff Fire Cracked Rock Site, located at the outlet of the "second lake" on the English Bay River;
- SEL-239, the English Bay River Falls Site, near the "first lake" on the English Bay River;
- SEL-243, the English Bay River ATV Trail Crossing, roughly 1.5 mi. upstream from Nanwalek on the English Bay River;
- SEL-244, a site, located above the east shore of English Bay Lagoon, with possible stained soils and an isolated bifacial point;
- SEL-289, a grave located on Elias Romanoff's Native Allotment; and
- SEL-290, the location of graves thought to be near the old cannery in Port Graham.

Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

A variety of cultural remains identified in the vicinity of the proposed access road route provided evidence of use of the area during the past 50 years. These include stumps, an unused aluminum water pipe line, and the HEA power line and associated access trail.

The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

A single overhead power line was originally constructed by HEA between 1968 and 1973. It runs through the trees, which provide its support, along the southwest side of the proposed runway, and also intersects with the proposed access road in at least three places (Figure 2). The power line has an associated access trail that runs along near it, but not always under or next to it. This access trail was used for a number of years as both an all-terrain vehicle (ATV) and foot trail by residents of Port Graham and Nanwalek.

Determination of Eligibility
Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more

appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, Bureau of Indian Affairs, and Chugachmuit, to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

Office of History and Archaeology: Cultural Resources Report Coversheet

(Must Accompany All Compliance Reports Submitted to OHA/SHPO)

Office of History and Archaeology
Division of Parks & Outdoor Recreation
Alaska Department of Natural Resources
550 W. 7th Ave., Suite 1310
Anchorage, AK 99501-3565
Phone: (907) 269-8721 Fax (907) 269-8908
http://www.dnr.state.ak.us/parks/oha/index.htm

Was this survey/investigation(Check one): ***Negative*** [ ] ***Positive*** [X]

Negative = no cultural resource sites are reported or updated. Positive = cultural resource sites are reported or updated.

*Note: Alaska Heritage Resources Survey (AHRS) numbers are **required** for reported cultural resource sites, including buildings. AHRS numbers can be obtained by contacting Joan Dale at 907-269-8718).*

Project/Report Information:

- Report Title: ***Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska***
- Report Author(s): ***Linda Finn Yarborough and Sarah J. Meitl***
- Report Date: ***February 2010***
- Submitting Organization/Agency ***DOT&PF/FAA***
- Project Name and Project Number: ***#58348, Nanwalek and Port Graham Airport***
- Principal Investigator (PI) name: ***Linda Finn Yarborough***

Geographic Information (attach an extra sheet or cite report page numbers if necessary)

- USGS Mapsheet (1:63,360 if available)
- Meridian/Township / Range / Section (MTRS) location: (all affected sections) SM/T9S/R16W/S35-36;SM/T9S/R15W/S31-32

Format example: "F021N018E|13-14"

- Verbal description of survey area

(for example: "123 Acme Street," "confluence of Fish and Moose creeks," "Milepost 9-16 …"
Proposed access road and airport between Port Graham and Nanwalek, southwestern Kenai Peninsula

- Does this report contain boundary coordinates for the surveyed area? Yes [ ] No [X] Page #(s) _____
- Does this report contain boundary coordinates for reported sites? Yes [ ] No [X] Page #(s) _____
- Land owner(s): BIA Native allotments
- Answer one: Acres Surveyed 115 Hectares Surveyed _____

Cultural Resources Management (CRM) Information

- List AHRS numbers of new and updated sites – (do not list sites that are merely described in the background section).
  SEL-348
- Is the report part of a National Historic Preservation Act - Section 106 consultation? Yes [X] No [ ]
- Is the report part of an Alaska Historic Preservation Act compliance consultation? Yes [X] No [ ]
- Does the report's data support a submitting agency's determination of eligibility? Yes [X] No [ ]
- Does the report's data support a submitting agency's determination of effect? Yes [X] No [ ]
- Was this report submitted to fulfill State Field Archaeology Permit requirements?
  Permit No.: _____ Yes [ ] No [X]
- Was this project and/or report overseen or authored by someone meeting the minimum qualifications of the Sec. of the Interior's Standards and Guidelines (48 FR 44738-44739)? Yes [X] No [ ]
- Is the Principal Investigator's resume' appended to the report or on file at OHA? Yes [X] No [ ]

Revised 3/29/07

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR
4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

Mr. Ricky Hoff
Regional Archeologist
Bureau of Indian Affairs
3601 C Street, Suite 1100
Anchorage, AK 99503-5947

Dear Mr. Huff:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek and Port Graham Airport and Access Road Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF, on behalf of the FAA, finds an adverse effect on historic properties by the proposed project.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations.

Relocation of the existing airports was explored in site reconnaissance studies, which evaluated seven other potential locations. After consultation with the communities, a shared airport at Romanoff Point was chosen as the only build alternative to be carried forward for further analysis in the National Environmental Policy Act (NEPA) document.

Project Description

The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. This has changed from the initiation letter sent on June 28, 2010 that stated a 75-foot wide runway would be constructed. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither

community is accessible by road, but the communities are linked to each other by two walking trails, one of which is impassible. The proposed project would require acquisitions of portions of native allotments and village corporation lands. Pending approvals of the proposed project, including NEPA document and permit acquisitions, funding, and property acquisition, construction could begin as early as 2014. Pre-NEPA approvals are also required such as Revocable Use Permits (RUP) from your office for geotechnical and survey work on native allotments.

Area of Potential Effect

The communities of Port Graham and Nanwalek are located on the southwestern end of the Kenai Peninsula near the entrance to Kachemak Bay off Cook Inlet. The villages are approximately three air miles apart and have been connected over the years by two trails, the Homer Electric Association (HEA) Trail, which is also sometimes called the "walking trail," and the now relatively unused Port Graham–Nanwalek Civilian Conservation Corps Trail (CCC Trail).

The original study area, surveyed for cultural resources in 2008 and 2009, consisted of the proposed access road 200-foot right-of-way (ROW) and the proposed airport property with a surrounding 1,000-foot wide buffer. The project design was later refined and with more accurate topographic information the Area of Potential Effect (APE) was later identified in the fall of 2009 to include all areas that might require ground-disturbing work (Figure 4). The APE consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer. The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design.

Identification Efforts

Cultural Resource Consultants LLC (CRC) conducted the cultural resources study for the study area, (the *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* (November 2010) is enclosed). The pre-survey literature search, limited to the immediate Nanwalek area and the southwest coast of Port Graham Bay, yielded information on 16 sites within 0.75 mile of the proposed project area (Figure 3). All sites are either along the ocean coast or adjacent to salmon streams. These Alaska Heritage Resources Survey (AHRS) sites are:

- SEL-003, the remains of the Russian American Company post, Alexandrovsk Redoubt, located under the existing Nanwalek runway on the spit just south of Nanwalek in English Bay, roughly five miles south of the entrance to Kachemak Bay, on the east shore of Cook Inlet;
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- SEL-027, the Port Graham Village Cannery Site, located on the south shore of Port Graham, which contains a prehistoric component, as well as the historic cannery component;
- SEL-161, the Moonin Midden, located on the Sergius Moonin Allotment just west northwest of Port Graham Village;
- SEL-166, the Anahonak Midden, located near the head Port Graham Bay, about 2 miles southwest of Port Graham Village;
- SEL-170, the location of a partial human cranium, found north of Nanwalek and west of Russian Point;

- SEL-229, a campsite, roughly 0.5 mile southeast of Nanwalek on the English Bay River;
- SEL-230, site Area #2 Logging Unit, on the west bank of the English Bay River, upstream from the lagoon;
- SEL-231, a largely unknown, sub-surface site of ash and charcoal, on a beach ridge on the east shore of English Bay lagoon;
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- SEL-244, a site, located above the east shore of English Bay Lagoon, with possible stained soils and an isolated bifacial point;
- SEL-289, a grave located on Elias Romanoff's Native Allotment; and
- SEL-290, the location of graves thought to be near the old cannery in Port Graham.

Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

A variety of cultural remains identified in the vicinity of the proposed access road route provided evidence of use of the area during the past 50 years. These include stumps, an unused aluminum water pipe line, and the HEA power line and associated access trail.

The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

A single overhead power line was originally constructed by HEA between 1968 and 1973. It runs through the trees, which provide its support, along the southwest side of the proposed runway, and also intersects with the proposed access road in at least three places (Figure 2). The power line has an associated access trail that runs along near it, but not always under or next to it. This access trail was used for a number of years as both an all-terrain vehicle (ATV) and foot trail by residents of Port Graham and Nanwalek.

Determination of Eligibility
Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the

CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the State Historic Preservation Officer, Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and Chugachmuit to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

See Distribution List

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Determination of Eligibility

Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was

maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

> *Criterion A: Association with events that have made a significant contribution to the broad patterns of history.*
>
> The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.
>
> *Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.*
>
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DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

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DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the State Historic Preservation Officer, Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, Bureau of Indian Affairs, and Chugachmuit, to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

Distribution List:

Native Village of Nanwalek
Mr. Wally Kvasnikoff, Chief
P.O. Box 8028
Nanwalek, AK 99603-8028

English Bay Corporation
Mr. Don Emmil, President
1637 Stanton Ave.
Anchorage, AK 99508

Native Village of Port Graham
Mr. Patrick Norman, Chief
P.O. Box 5510
Port Graham, AK 99603-5570

Port Graham Corporation
Mr. Walter Meganack, President
P.O. Box 5569
Port Graham, AK 99603

Chugach Alaska Corporation
Mr. Barney Uhart, President
3800 Centerpoint Drive, Ste. 601
Anchorage, AK 99503

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

Mr. Patrick Anderson, Executive Director
Chugachmuit
1840 Bragaw Street, Suite 110
Anchorage, Alaska 99508-3463

Dear Mr. Anderson:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek and Port Graham Airport and Access Road Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF, on behalf of the FAA, finds an adverse effect on historic properties by the proposed project.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations.

Relocation of the existing airports was explored in site reconnaissance studies, which evaluated seven other potential locations. After consultation with the communities, a shared airport at Romanoff Point was chosen as the only build alternative to be carried forward for further analysis in the National Environmental Policy Act (NEPA) document.

Project Description

The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. This has changed from the initiation letter sent on June 28, 2010 that stated a 75-foot wide runway would be constructed. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither community is accessible by road, but the communities are linked to each other by two walking

trails, one of which is impassible. The proposed project would require acquisitions of portions of native allotments and village corporation lands. Pending approvals of the proposed project, including NEPA document and permit acquisitions, funding, and property acquisition, construction could begin as early as 2014. Pre-NEPA approvals are also required such as Revocable Use Permits (RUP) from the Bureau of Indian Affairs (BIA) for geotechnical and survey work on native allotments.

Area of Potential Effect

The communities of Port Graham and Nanwalek are located on the southwestern end of the Kenai Peninsula near the entrance to Kachemak Bay off Cook Inlet. The villages are approximately three air miles apart and have been connected over the years by two trails, the Homer Electric Association (HEA) Trail, which is also sometimes called the "walking trail," and the now relatively unused Port Graham–Nanwalek Civilian Conservation Corps Trail (CCC Trail).

The original study area, surveyed for cultural resources in 2008 and 2009, consisted of the proposed access road 200-foot right-of-way (ROW) and the proposed airport property with a surrounding 1,000-foot wide buffer. The project design was later refined and with more accurate topographic information the Area of Potential Effect (APE) was later identified in the fall of 2009 to include all areas that might require ground-disturbing work (Figure 4). The APE consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer. The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design.

Identification Efforts

Cultural Resource Consultants LLC (CRC) conducted the cultural resources study for the study area, (the *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* (November 2010) is enclosed). The pre-survey literature search, limited to the immediate Nanwalek area and the southwest coast of Port Graham Bay, yielded information on 16 sites within 0.75 mile of the proposed project area (Figure 3). All sites are either along the ocean coast or adjacent to salmon streams. These Alaska Heritage Resources Survey (AHRS) sites are:

- SEL-003, the remains of the Russian American Company post, Alexandrovsk Redoubt, located under the existing Nanwalek runway on the spit just south of Nanwalek in English Bay, roughly five miles south of the entrance to Kachemak Bay, on the east shore of Cook Inlet;
- SEL-018, the Saints Sergius and Herman of Valaam Church, within the village of Nanwalek;
- SEL-027, the Port Graham Village Cannery Site, located on the south shore of Port Graham, which contains a prehistoric component, as well as the historic cannery component;
- SEL-161, the Moonin Midden, located on the Sergius Moonin Allotment just west northwest of Port Graham Village;
- SEL-166, the Anahonak Midden, located near the head Port Graham Bay, about 2 miles southwest of Port Graham Village;
- SEL-170, the location of a partial human cranium, found north of Nanwalek and west of Russian Point;
- SEL-229, a campsite, roughly 0.5 mile southeast of Nanwalek on the English Bay River;

- SEL-230, site Area #2 Logging Unit, on the west bank of the English Bay River, upstream from the lagoon;
- SEL-231, a largely unknown, sub-surface site of ash and charcoal, on a beach ridge on the east shore of English Bay lagoon;
- SEL-232, a small midden on the south shore of English Bay Lagoon;
- SEL-238, the Sarjus Kvasnikoff Fire Cracked Rock Site, located at the outlet of the "second lake" on the English Bay River;
- SEL-239, the English Bay River Falls Site, near the "first lake" on the English Bay River;
- SEL-243, the English Bay River ATV Trail Crossing, roughly 1.5 mi. upstream from Nanwalek on the English Bay River;
- SEL-244, a site, located above the east shore of English Bay Lagoon, with possible stained soils and an isolated bifacial point;
- SEL-289, a grave located on Elias Romanoff's Native Allotment; and
- SEL-290, the location of graves thought to be near the old cannery in Port Graham.

Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

A variety of cultural remains identified in the vicinity of the proposed access road route provided evidence of use of the area during the past 50 years. These include stumps, an unused aluminum water pipe line, and the HEA power line and associated access trail.

The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

A single overhead power line was originally constructed by HEA between 1968 and 1973. It runs through the trees, which provide its support, along the southwest side of the proposed runway, and also intersects with the proposed access road in at least three places (Figure 2). The power line has an associated access trail that runs along near it, but not always under or next to it. This access trail was used for a number of years as both an all-terrain vehicle (ATV) and foot trail by residents of Port Graham and Nanwalek.

Determination of Eligibility
Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more

appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the State Historic Preservation Officer, Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and the Bureau of Indian Affairs, to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8908

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS & OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

Date: 8/2/11
Proj. #: 52250

Preliminary Design & Environmental	PAPER	PDF
Section Chief		
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Project File		

August 1, 2011

File No.: 3130-1R FAA
3330-6 Port Graham-Nanwalek CCC Trail (SEL-348)

Brian Elliott
Regional Environmental Manager
Department of Transportation and Public Facilities
4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900

Subject: Nanwalek and Port Graham Airport and Access Road Project

Dear Mr. Elliott:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence (dated July 22, 2011) on July 26, 2011. Following our review of the documentation provided, we offer the following comments:

We concur with DOT&PF and FAA's determination that the Port Graham-Nanwalek CCC Trail (SEL-348) is **eligible** for the National Register of Historic Places (NRHP). We agree that the trail is significant under Criterion A. Additionally, we understand DOT&PF's reasoning regarding eligibility under Criterion D, but believe that the question of whether Criterion D applies with respect to the eligibility of SEL-348 can be clarified as we work through the resolution of adverse effects to the resource. At present, we do not have enough information to determine whether Criterion D applies.

We concur that a finding of **adverse effect** is appropriate for the proposed undertaking as it will involve three crossings of the Port Graham-Nanwalek Trail (SEL-348). As such, we look forward to continued consultation on the subject undertaking and to developing a Memorandum of Agreement (MOA) that would resolve the adverse effect. Please note that the agency official shall notify the Advisory Council of the adverse effect finding (36 CFR 800.6[a][1]).

Please also note that should the proposed undertaking ultimately result in the disposition of the old Nanwalek airport runway out of Federal/State ownership or jurisdiction, our office believes that it may be appropriate to consider the indirect effects of this associated action as part of the Section 106 process for the current undertaking. As there are potential archaeological resources known from past research in this area, disposition of this area from agency jurisdiction could result in adverse effects to historic properties.

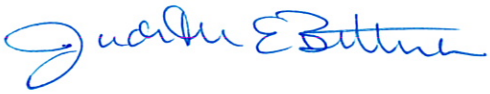
Finally, we understand that there may be some geotechnical investigations proposed that DOT&PF/FAA hopes to complete in preparation for the proposed airport and access road

undertaking. Should this work need to be completed soon, prior to the execution of the MOA discussed above, our office recommends that DOT&PF/FAA conduct Section 106 consultation on the geotechnical investigations as a connected undertaking, but for which the effects finding may differ from that of the larger airport and access road project. We are happy to provide additional guidance on this as appropriate.

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.

Thank you for the opportunity to comment. We look forward to continued consultation on the subject project. Please contact Shina duVall at 269-8720 or shina.duvall@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:sad

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250

August 19, 2011

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

Thank you for your concurrence on August 1, 2011, on the National Register of Historic Places eligibility of the Port Graham-Nanwalek CCC Trail (SEL-348) and our adverse effect finding for the Nanwalek and Port Graham Airport and Access Road Project. We will continue our consultation with your office to develop a Memorandum of Agreement (MOA) for this project and have contacted the Section 106 consulting parties to determine their interest in participating in consultation for the resolution of the adverse effects and in the MOA. We are presently waiting for their responses.

In advance of the MOA, we are proposing to conduct land surveying, geotechnical drilling, and geophysical surveys in anticipation of future construction of a shared airport and access road in between the communities of Nanwalek and Port Graham. The proposed geotechnical and survey activities would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.5(b), implementing regulations of Section 106 of the National Historic Preservation Act, the Alaska Department of Transportation and Public Facilities (DOT&PF) on behalf of the Federal Aviation Administration (FAA), finds no adverse effect on historic properties from the proposed survey and drilling activities.

Description of Survey and Geotechnical Activities

Land Surveying. The aircraft parking apron and the centerline of the proposed airport road and runway will be surveyed and marked using conventional line of sight surveying techniques. The survey will require cutting brush and tree clearing within roughly a four-foot wide corridor along the approximate centerline of the road and runway, and on the apron.

The property surveying effort will include locating and surveying of all of the property corners of all the parcels that are crossed by the airport and airport access road. The survey will require cutting brush and trees within roughly a four foot wide corridor along the approximate property boundary, as well as at select locations, a 50 foot by 50 foot area at the corner locations and at all

locations marked by a survey monument. Most parcels will be surveyed and marked using conventional line of sight surveying techniques.

Additional survey monuments will be established in a few locations between Nanwalek and Port Graham. At these locations, the survey will require cutting of brush and selective trees over a 50 foot by 50 foot area. The surveyed areas will be marked with survey tape, wood lath, and survey marker driven into the ground at selective locations.

Geotechnical Drilling. The geotechnical drilling program will be completed using two heli-base drill rigs transported by helicopter sling. Approximately 10 of the 30 drill sites identified in the enclosed figures will be cleared of trees of an approximate 50-foot radius at each planned drill site, and the cut trees will remain on-site. It is anticipated that approximately 10 of the sites identified will be drilled due to the 10 day duration planned for the helicopter rental; however, more may be completed as time allows. The test borings will be drilled using either 8-inch diameter hollow-stem auger, or 4-inch diameter coring equipment. Test borings will be advanced to depths of 20 to 60 feet below the ground surface. Select test borings for groundwater measurements will be installed using ¾-inch PVC standpipes. The test borings will be backfilled with cuttings or soil.

Geophysical Survey. A seismic refraction survey will be conducted along the first approximately 7,000 feet of the proposed access road. The survey will be performed by laying out geophone cables along a shoulder-width cleared path approximately 50 feet uphill from the proposed access road centerline (at the top of the proposed rock cut). As the proposed rock cuts will be as much as 50 feet along parts of the alignment, we will be using small 1/3 pound charges of kinestick to create seismic waves for recording the depth and quality of the bedrock.

The survey, drilling and geophysical survey crews will access the project area by ATV (if accessible) or on foot from either Port Graham or Nanwalek.

See the enclosed figures showing the anticipated parcels crossed by the airport and access road and the approximate parcel corner survey locations and potential drilling locations.

Area of Potential Effect

The Area of Potential Effect (APE) consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer (Figure 4). The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design. The APE does not include the existing Nanwalek or Port Graham Airports. Once the shared airport is completed, the Nanwalek Airport will be retained in State DOT&PF ownership (see enclosed memo, 3/25/11) and the Port Graham Airport will revert to federal ownership (see enclosed deed). The APE also does not include the property corners of the native allotments since no ground disturbance will occur from the land survey.

Identification Efforts

The Port Graham-Nanwalek CCC Trail (SEL-348) is the only historic property that has been identified within our APE as noted in our previous correspondence dated July 22, 2011.

Finding of Effect

Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road ROW crosses the CCC Trail three times.

Land Survey: The land survey involves cutting a four foot wide corridor of tree and brush at nine locations where native allotment boundaries cross the CCC Trail. The CCC Trail itself is relatively free from tree and brush growth. No trees or brush will be left across the CCC Trail or any of the 19 log bridges.

Geotechnical Drilling: Three identified drill site locations coincide with the CCC Trail which will involve cutting trees at each location in a 50-foot radius then drilling one 20-60 foot deep by four or eight inch diameter hole. The CCC Trail itself is relatively free from tree and brush growth. Drilling will occur at locations where fill would be placed for the future access road or large rock/soil cuts will be made. No trees or brush will be left across the CCC Trail or any of the 19 log bridges (closest drill location is near bridge #13).

Geophysical Survey: 7,000 feet of shoulder width clearing of trees and brush will occur of which there will be one crossing of the CCC Trail and approximately 700 feet will coincide with the CCC Trail. The clearing is to set up the geophones and small charge to create the seismic waves will have no adverse effect on the CCC Trail.

In conclusion, the survey and drilling activities will affect the setting by clearing and removing tree foliage and vegetation, but it would not introduce other elements into the setting. The only involvement with the CCC Trail – other than using the trail for the purposes of survey access – would be possible test borings, which would then be backfilled, restoring the trail surface. The DOT&PF on behalf of FAA finds that the proposed survey and drilling activities will have no adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

We are also consulting with the Bureau of Indian Affairs, the Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and Chugachmuit on the land surveying, geotechnical drilling, and geophysical surveying proposal.

Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4

Figure 4 with drill site locations
Figures 1A-G Native Allotments
Nanwalek Property Memo 3/25/11
Port Graham Airport Deed

cc w/ enclosures:
Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:
Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

See Distribution List

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek and Port Graham Airport and Access Road Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF, on behalf of the FAA, finds an adverse effect on historic properties by the proposed project.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations.

Relocation of the existing airports was explored in site reconnaissance studies, which evaluated seven other potential locations. After consultation with the communities, a shared airport at Romanoff Point was chosen as the only build alternative to be carried forward for further analysis in the National Environmental Policy Act (NEPA) document.

Project Description

The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. This has changed from the initiation letter sent on June 28, 2010 that stated a 75-foot wide runway would be constructed. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither community is accessible by road, but the communities are linked to each other by two walking trails, one of which is impassible. The proposed project would require acquisitions of portions of native allotments and village corporation lands. Pending approvals of the proposed project, including NEPA document and permit acquisitions, funding, and property acquisition, construction could begin as early as 2014. Pre-NEPA approvals are also required such as

Revocable Use Permits (RUP) from the Bureau of Indian Affairs (BIA) for geotechnical and survey work on native allotments.

Area of Potential Effect

The communities of Port Graham and Nanwalek are located on the southwestern end of the Kenai Peninsula near the entrance to Kachemak Bay off Cook Inlet. The villages are approximately three air miles apart and have been connected over the years by two trails, the Homer Electric Association (HEA) Trail, which is also sometimes called the "walking trail," and the now relatively unused Port Graham–Nanwalek Civilian Conservation Corps Trail (CCC Trail).

The original study area, surveyed for cultural resources in 2008 and 2009, consisted of the proposed access road 200-foot right-of-way (ROW) and the proposed airport property with a surrounding 1,000-foot wide buffer. The project design was later refined and with more accurate topographic information the Area of Potential Effect (APE) was later identified in the fall of 2009 to include all areas that might require ground-disturbing work (Figure 4). The APE consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer. The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design.

Identification Efforts

Cultural Resource Consultants LLC (CRC) conducted the cultural resources study for the study area, (the *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* (November 2010) is enclosed). The pre-survey literature search, limited to the immediate Nanwalek area and the southwest coast of Port Graham Bay, yielded information on 16 sites within 0.75 mile of the proposed project area (Figure 3). All sites are either along the ocean coast or adjacent to salmon streams. These Alaska Heritage Resources Survey (AHRS) sites are:

- SEL-003, the remains of the Russian American Company post, Alexandrovsk Redoubt, located under the existing Nanwalek runway on the spit just south of Nanwalek in English Bay, roughly five miles south of the entrance to Kachemak Bay, on the east shore of Cook Inlet;
- SEL-018, the Saints Sergius and Herman of Valaam Church, within the village of Nanwalek;
- SEL-027, the Port Graham Village Cannery Site, located on the south shore of Port Graham, which contains a prehistoric component, as well as the historic cannery component;
- SEL-161, the Moonin Midden, located on the Sergius Moonin Allotment just west northwest of Port Graham Village;
- SEL-166, the Anahonak Midden, located near the head Port Graham Bay, about 2 miles southwest of Port Graham Village;
- SEL-170, the location of a partial human cranium, found north of Nanwalek and west of Russian Point;
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- SEL-230, site Area #2 Logging Unit, on the west bank of the English Bay River, upstream from the lagoon;
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- SEL-232, a small midden on the south shore of English Bay Lagoon;
- SEL-238, the Sarjus Kvasnikoff Fire Cracked Rock Site, located at the outlet of the "second lake" on the English Bay River;
- SEL-239, the English Bay River Falls Site, near the "first lake" on the English Bay River;
- SEL-243, the English Bay River ATV Trail Crossing, roughly 1.5 mi. upstream from Nanwalek on the English Bay River;
- SEL-244, a site, located above the east shore of English Bay Lagoon, with possible stained soils and an isolated bifacial point;
- SEL-289, a grave located on Elias Romanoff's Native Allotment; and
- SEL-290, the location of graves thought to be near the old cannery in Port Graham.

Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

A variety of cultural remains identified in the vicinity of the proposed access road route provided evidence of use of the area during the past 50 years. These include stumps, an unused aluminum water pipe line, and the HEA power line and associated access trail.

The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

A single overhead power line was originally constructed by HEA between 1968 and 1973. It runs through the trees, which provide its support, along the southwest side of the proposed runway, and also intersects with the proposed access road in at least three places (Figure 2). The power line has an associated access trail that runs along near it, but not always under or next to it. This access trail was used for a number of years as both an all-terrain vehicle (ATV) and foot trail by residents of Port Graham and Nanwalek.

Determination of Eligibility

Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was

maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

> *Criterion A: Association with events that have made a significant contribution to the broad patterns of history.*
>
> The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.
>
> *Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.*
>
> The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the State Historic Preservation Officer, Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, Bureau of Indian Affairs, and Chugachmuit, to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

Distribution List:

Native Village of Nanwalek
Mr. Wally Kvasnikoff, Chief
P.O. Box 8028
Nanwalek, AK 99603-8028

English Bay Corporation
Mr. Don Emmil, President
1637 Stanton Ave.
Anchorage, AK 99508

Native Village of Port Graham
Mr. Patrick Norman, Chief
P.O. Box 5510
Port Graham, AK 99603-5570

Port Graham Corporation
Mr. Walter Meganack, President
P.O. Box 5569
Port Graham, AK 99603

Chugach Alaska Corporation
Mr. Barney Uhart, President
3800 Centerpoint Drive, Ste. 601
Anchorage, AK 99503

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
CENTRAL REGION DESIGN AND CONSTRUCTION
PRELIMINARY DESIGN AND ENVIRONMENTAL SECTION

SEAN PARNELL, GOVERNOR

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900

PHONE: (907) 269-0542
FAX: (907) 243-6927

In Reply Refer To:
State Project 52250
ATTENTION: This finding contains 1 DOE

July 22, 2011

Mr. Patrick Anderson, Executive Director
Chugachmuit
1840 Bragaw Street, Suite 110
Anchorage, Alaska 99508-3463

Dear Mr. Anderson:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek and Port Graham Airport and Access Road Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2. Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF, on behalf of the FAA, finds an adverse effect on historic properties by the proposed project.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations.

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The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. This has changed from the initiation letter sent on June 28, 2010 that stated a 75-foot wide runway would be constructed. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither community is accessible by road, but the communities are linked to each other by two walking

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Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

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The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

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Determination of Eligibility
Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the CCC and was maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's recommendation:
CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's recommendation:
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more

appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the *A Context For Common Historic Bridge Types*, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and ready available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's determination:
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Other Cultural Resource Sites

CRC's recommendation:
Other cultural remains noted during the survey for the proposed project were modern garbage in the airport runway and apron areas; and recent logging stumps, a water intake pipe, the HEA trail and overhead power line. The logging-related stumps are not likely eligible for listing in the National Register. They might be worthy of note as a type of culturally modified tree (CMT), and evidence of cultural activity during recent years, but individual or even small groups of CMTs are generally not considered significant enough to be eligible for the National Register (Bittner 1991). The water intake pipe, and the HEA trail and overhead power line are less than 50 years old. They are not fragile resources, and do not represent extraordinary events; therefore, they are also not likely eligible for listing in the National Register.

FAA's determination:
FAA agrees with CRC's recommendation and has determined that the other cultural remains identified during the survey are not eligible for the National Register.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's finding:
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consulting Parties:
Other parties being consulted during this Section 106 Finding effort include the State Historic Preservation Officer, Native Village of Nanwalek, English Bay Corporation, the Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and the Bureau of Indian Affairs, to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of a Memorandum of Agreement (MOA).

Once we receive your response, we will consult with your office to identify mitigation measures as needed to offset the adverse effects of this project. Please direct your concurrence or comments to me at the address above, by telephone at 907-269-0539, or by e-mail at brian.elliott@alaska.gov. For this purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Brian Elliott

Brian Elliott
Regional Environmental Manager

Enclosures:
Figures 1-4
Office of History and Archaeology Coversheet
Cultural Resource Consultants LLC (CRC). 2010. *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska*. November 2010.

References:

Bittner, Judith E. 1991. Letter to John Hildebrand, Department of Transportation and Public Facilities, Anchorage. Copy on file, Alaska Department of Natural Resources, Office of History and Archaeology, Anchorage.

cc w/ enclosures:

Gabriel Mahns, FAA, Project Manager
Patti Sullivan, FAA, Environmental Program Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:

Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

U.S. Department of Transportation

Federal Aviation Administration

Alaskan Region Airports Division
222 W. 7th Avenue, Box 14
Anchorage, Alaska 99513-7587

In Reply Refer To:
State Project 52250
Finding of Adverse Effect Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2)

September 27, 2011

Blythe Semmer
Federal Permitting, Licensing, and Assistance Section
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, DC 20004

Dear Ms. Semmer:

The Federal Aviation Administration (FAA) Alaskan Region Airports Division intends to provide financial assistance to the Alaska Department of Transportation and Public Facilities (DOT&PF) for the construction of a shared airport and access road in between the communities of Nanwalek and Port Graham (Nanwalek – Port Graham Airport Project [project]). The proposed project would be located in Sections 31 and 32, Township 10S, Range 15W and Sections 35 and 36, Township 10S, Range 16W (United States Geological Survey Quadrangle Seldovia B-5 and B-6); Figures 1 and 2.

Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, the FAA finds an adverse effect on historic properties by the proposed project. Accordingly, the FAA is notifying the Advisory Council on Historic Preservation (ACHP) and extending an invitation to participate in the FAA's finding and resolution of adverse effect.

The purpose and need of the proposed project is to provide a safer and more reliable airport for the communities of Nanwalek and Port Graham. Currently, both communities have air strips; however, the runway lengths do not meet FAA standards. Neither of the existing air strip locations is suitable for runway extensions due to terrain and community locations. Relocation of the existing airports was explored in site reconnaissance studies, which evaluated seven other potential locations. After consultation with the communities, a shared airport at Romanoff Point was chosen as the only build alternative to be carried forward for further analysis in the National Environmental Policy Act (NEPA) document.

Project Description
The proposed project would consist of constructing a new 3,300-foot long by 60-foot wide runway, 3,780-foot long by 120-foot wide runway safety area, a 25-foot wide taxiway, and a 60,000-square foot apron. A 3.5-mile long by 22.5-foot wide airport access road would be constructed that would connect the two communities. Currently, neither community is accessible by road, but the communities are linked to each other by two walking trails, one of which is impassible. The proposed project would require acquisition of portions of native allotments and village corporation lands. Pending approvals of the proposed project, including NEPA document and permit acquisitions, funding, and property acquisition, construction could begin as early as 2014.

Area of Potential Effect
The communities of Port Graham and Nanwalek are located on the southwestern end of the Kenai Peninsula near the entrance to Kachemak Bay off Cook Inlet. The villages are approximately three air miles apart and have been connected over the years by two trails, the Homer Electric Association (HEA) Trail, which is also sometimes called the "walking trail," and the now relatively unused Port Graham–Nanwalek Civilian Conservation Corps Trail (CCC Trail).

The original study area, surveyed for cultural resources in 2008 and 2009, consisted of the proposed access road 200-foot right-of-way (ROW) and the proposed airport property with a surrounding 1,000-foot wide buffer. The project design was later refined and with more accurate topographic information the Area of Potential Effect (APE) was later identified in the fall of 2009 to include all areas that might require ground-disturbing work (Figure 4). The area of potential effect (APE) consists of the proposed access road ROW and airport property with a surrounding 100-foot wide buffer. The APE provides enough room for potential alignment shifts and minor changes to the project footprint during final design.

Identification Efforts
Cultural Resource Consultants LLC (CRC) conducted the cultural resources study for the study area, (the *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska* [November 2010] is enclosed). The pre-survey literature search, limited to the immediate Nanwalek area and the southwest coast of Port Graham Bay, yielded information on 16 sites within 0.75 mile of the proposed project area (Figure 3). All sites are either along the ocean coast or adjacent to salmon streams. These Alaska Heritage Resources Survey (AHRS) sites are:

- SEL-003, the remains of the Russian American Company post, Alexandrovsk Redoubt, located under the existing Nanwalek runway on the spit just south of Nanwalek in English Bay, roughly five miles south of the entrance to Kachemak Bay, on the east shore of Cook Inlet;
- SEL-018, the Saints Sergius and Herman of Valaam Church, within the village of Nanwalek;
- SEL-027, the Port Graham Village Cannery Site, located on the south shore of Port Graham, which contains a prehistoric component, as well as the historic cannery component;
- SEL-161, the Moonin Midden, located on the Sergius Moonin Allotment just west northwest of Port Graham Village;

- SEL-166, the Anahonak Midden, located near the head Port Graham Bay, about 2 miles southwest of Port Graham Village;
- SEL-170, the location of a partial human cranium, found north of Nanwalek and west of Russian Point;
- SEL-229, a campsite, roughly 0.5 mile southeast of Nanwalek on the English Bay River;
- SEL-230, site Area #2 Logging Unit, on the west bank of the English Bay River, upstream from the lagoon;
- SEL-231, a largely unknown, sub-surface site of ash and charcoal, on a beach ridge on the east shore of English Bay lagoon;
- SEL-232, a small midden on the south shore of English Bay Lagoon;
- SEL-238, the Sarjus Kvasnikoff Fire Cracked Rock Site, located at the outlet of the "second lake" on the English Bay River;
- SEL-239, the English Bay River Falls Site, near the "first lake" on the English Bay River;
- SEL-243, the English Bay River all-terrain vehicle (ATV) Trail Crossing, roughly 1.5 mi. upstream from Nanwalek on the English Bay River;
- SEL-244, a site, located above the east shore of English Bay Lagoon, with possible stained soils and an isolated bifacial point;
- SEL-289, a grave located on Elias Romanoff's Native Allotment; and
- SEL-290, the location of graves thought to be near the old cannery in Port Graham.

Proposed Airport

The portion of the project APE that includes the proposed airport lies to the south of the proposed access road and was surveyed during the 2008 field season (Figure 4). The topography of this area is irregular, with dense stands of spruce, and an understory of ferns, berries, alders and devils club. Several wetland areas are also within the APE. No cultural sites were found within the proposed airport property.

Proposed Access Road

The proposed route of the access road between Nanwalek and Port Graham traverses a largely undeveloped strip of land between the two villages. The ground is very irregular and densely vegetated, with a combination of tall spruce, devil's club, salmonberry, ferns, and some grasses. Little of the APE in the vicinity of this route was considered high sensitivity for cultural resources due to a high degree of landscape slope, lack of anadromous fish streams, and large distance from known cultural resources along the coast. Those few areas that were within the high sensitivity parameters were surveyed.

A variety of cultural remains identified in the vicinity of the proposed access road route provided evidence of use of the area during the past 50 years. These include stumps, an unused aluminum water pipe line, and the HEA power line and associated access trail.

The stumps appear to be from fairly recent logging that began during the 1960s and continued through the 1980s. The pipe line crosses the proposed access road east of the stream flowing from the Port Graham reservoir. This pipe is part of the water system that carried water from the reservoir to Port Graham in the 1980s.

A single overhead power line was originally constructed by HEA between 1968 and 1973. It runs through the trees, which provide its support, along the southwest side of the proposed runway, and also intersects with the proposed access road in at least three places (Figure 2). The power line has an associated access trail that runs along near it, but not always under or next to it. This access trail was used for a number of years as both an ATV and foot trail by residents of Port Graham and Nanwalek.

Determination of Eligibility

Port Graham-Nanwalek CCC Trail (SEL-348)

CRC's survey documented the CCC Trail (Figure 4). The trail which may have been in existence as early as 1897 was upgraded to its current size in 1937 by the Civilian Conservation Corps (CCC) and was maintained for approximately 40 years. It is now overgrown with vegetation in places and its original CCC bridges have deteriorated or have been slightly modified.

CRC's Recommendation

CRC recommended that the CCC Trail is likely eligible for the National Register of Historic Places (National Register) under Criteria A and D, with a period of significance between 1937, when the trail was constructed, and the early 1980s, when trail maintenance ceased and it was no longer used on a regular basis. The Port Graham–Nanwalek CCC Trail has changed little since it was built and retains most of its seven aspects of historic integrity. The CCC Trail is in its original location, its setting is intact, it still has the essential features expressive of its design and function, and these features are visible enough to convey their significance.

Criterion A: Association with events that have made a significant contribution to the broad patterns of history.

The CCC Trail is over 70 years old at this time, and was used throughout most of the twentieth century. It is associated with the development of the communities of Port Graham and Nanwalek, and with the cannery period in the region. CCC work on the trail demonstrates the variety of projects the agency undertook to provide employment to Alaska Natives in south-central Alaska during the Great Depression of the 1930s. The CCC Trail is one of the few, if any, that still exist in south-central Alaska. The trail's long history and function as a connecting route between Port Graham and Nanwalek are significant enough to qualify under Criterion A for association with local, regional, and national events.

Criterion D: Having yielded, or having the potential to yield, information important in prehistory or history.

The CCC Trail and its bridges were built by the Alaska Forest Service, and the bridges represent a design type and time period that are poorly documented and of which there are few extant examples. Further documentation could provide information on the comparability of the bridge designs to Bureau of Public Roads or Alaska Road Commission bridge designs, and reveal construction techniques and

type of wood chosen for use. The CCC Trail has the ability to provide information about period design and land use patterns of the Alutiiq on the southern Kenai Peninsula. Native trails in Alaska are often undocumented and as systems of communication and transportation, have the potential to answer questions about the organization of trade, intergroup relations, and land-use patterns. Such trails are known to represent human shaping and use of the environment during the early twentieth century on the Kenai Peninsula, but are also traces of earlier use. Trails can often answer questions and lead to new ones about how, why, and when people moved on the landscape.

DOT&PF's Recommendation
DOT&PF agrees that the CCC Trail is eligible for the National Register under Criterion A at local and regional levels; however DOT&PF disagrees with CRC's recommendation that the CCC Trail is eligible under Criterion D. It is DOT&PF's opinion that Criterion D is more appropriately applied to archaeological properties and that this criterion generally does not apply to bridges (or trails), although in rare instances it could apply to an unusual or technologically significant bridge for which no plans or other documentation survives. DOT&PF's opinion also coincides with conclusions of the A Context For Common Historic Bridge Types, prepared for the National Cooperative Highway Research Program (October 2005) (page 1-7).

This is a hard-packed dirt track trail with 19 log bridges constructed through a spruce-hemlock forest, crossing drainages and streams, and marshes. CRC indicates that the bridges are of a timber stringer-type design which was typical for CCC projects during that time, and the timber is of local spruce and hemlock. The stringer bridges along the CCC Trail vary in length depending on the drainage crossing. There is no indication that there are any associated surface or subsurface cultural remains along the trail corridor.

DOT&PF believes this bridge design to have a relatively low level of significance. Generally, timber stringers are a common bridge type prevalent throughout the country and standard for trails; they can also be found on low-trafficked roads. Because of the structure's simplicity and readily available materials, the timber bridge continues to be used to the present day.

Typical character defining features are longitudinal beams (or stringers) and the bridge piles (or supports). The timber stringers support a wood plank or log deck. The stringer ends rest on a vertical support (or abutment), which for this trail are logs. The bridges along this CCC Trail have no railings. DOT&PF does not agree that further evaluation of this simple bridge type will yield important information pertaining to its design. The type of wood used for the CCC Trail bridges is local material and the terrain which does not appear challenging does not rise to the level that requires the development of alternative construction techniques. Furthermore, with the absence of associated cultural resources along the trail corridor DOT&PF is not certain how further archaeological investigations of the trail could yield information important to answer questions about the organization of trade, intergroup relations, and land-use patterns.

FAA's Determination
FAA agrees with DOT&PF's recommendation and has determined that the Port Graham-Nanwalek CCC Trail (SEL-348) is eligible for the National Register under Criterion A at local and regional levels.

Finding of Effect
Based on CRC's research and field study, the only historic site that may be affected by the proposed project is the CCC Trail (SEL-348). Approximately 3,443 feet of the CCC Trail, including six log bridges (13 through 18), are contained within the proposed road ROW between Port Graham and Nanwalek, in the western half of the study area (Figure 4). The proposed road crosses the CCC Trail three times. Construction plans for the proposed 22-foot wide road include cutting and filling to create a more even grade than current topography. The majority of the proposed road would have 2:1 cut and fill slopes, but along steep cliffs a rock catchment design with 0.5:1 cut slopes is proposed.

CRC recommends that cutting and filling within the portion of the access road study area that coincides with the CCC Trail would likely erase all evidence of the trail and six of its bridges in this vicinity, and will disconnect the undisturbed sections of trail. The proposed construction will dramatically alter the trail's integrity. As a result, the access road as proposed would have an adverse effect on the CCC Trail.

FAA's Finding
FAA agrees with CRC's recommendation and finds that this project has an adverse effect on the Port Graham-Nanwalek CCC Trail (SEL-348).

Consultation Efforts
Initiation of consultation letters were sent out to the Section 106 consulting parties (Alaska State Historic Preservation Office, Native Village of Nanwalek, English Bay Corporation, Native Village of Port Graham, Port Graham Corporation, Chugach Alaska Corporation, and Chugachmuit) on June 28, 2010 requesting input on identifying historic properties. The Bureau of Indian Affairs (BIA) was later identified as a consulting party and was sent an initiation of consultation letter on April 22, 2011. No responses to the initiation of consultation letters were received.

Finding of adverse effect letters with a request for interest in participating in consultation for the resolution of the adverse effect and in the development of a Memorandum of Agreement (MOA) were sent out to all the Section 106 consulting parties on July 22, 2011. SHPO concurred with with FAA's determination of eligibility under Criterion A and the finding of adverse effect on August 1, 2011. DOT&PF is also consulting with BIA for their approval of a BIA Revocable Use Permit for project geotechnical investigation that involves a Native allotment. FAA received SHPO concurrence on the proposed survey and geotechnical activities on August 23, 2011. BIA responded on August 24, 2011 agreeing with CRC's recommendations of eligibility and effect. No other responses have been received to date.

We are contacting the Section 106 consulting parties to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of the Memorandum of Agreement (MOA). Please advise me of the ACHP's interest in participating in consultation for the resolution of adverse effects, and if the ACHP would like to be a signatory to the MOA.

If you wish to discuss this project with me, I can be reached at the address above, by telephone at 907-271-5454, or by e-mail at Patricia.Sullivan@faa.gov.

Sincerely,

Patricia Sullivan
Environmental ProgramManager, Airports Division

Enclosures:
Figures 1-4
Cultural Resource Consultants LLC (CRC), *Cultural Resource Survey for a New Airport Near Port Graham and Nanwalek, Alaska,* November 2010.

cc w/ enclosures:
Gabriel Mahns, FAA, Project Manager
Laurie Mulcahy, DOT&PF Statewide, Cultural Resources Manager
Valerie Gomez, DOT&PF Central Region, Cultural Resource Specialist

cc w/o enclosures:
Morgan Merritt, P.E., DOT&PF Central Region, Project Manager
Dan Golden, DOT&PF Central Region, Environmental Analyst

U.S. Department
of Transportation

**Federal Aviation
Administration**

Alaskan Region Airports Division
222 W. 7th Avenue, Box 14
Anchorage, Alaska 99513-7587
Tel. (907) 271-5438
Fax (907) 271-2851

October 16, 2012

Ms. Najah Duvall-Gabriel
Office of Federal Agency Programs
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue NW, Suite 809
Washington D.C. 20004

Dear Ms. Duvall-Gabriel:

Nanwalek and Port Graham Airport Project, State Project No. 52250
Filing of Executed Memorandum of Agreement
Port Graham-Nanwalek Civilian Conservation Corps Trail (SEL-348)

The Alaskan Region of the Federal Aviation Administration (FAA) and the airport sponsor, the Alaska Department of Transportation & Public Facilities (DOT&PF) are proposing to construct a shared airport and access road in between the communities of Nanwalek and Port Graham, Alaska. The FAA and DOT&PF in consultation with the Alaska State Historic Preservation Officer (SHPO) determined that the undertaking would have an adverse effect on historic properties. Your office was notified of the adverse effect and chose not be a party to the Memorandum of Agreement on October 17, 2011.

As required by 36 CFR Part 800.6(b)(1)(iv), the FAA is providing the Advisory Council on Historic Preservation with a copy of the fully executed *Memorandum of Agreement between the Federal Aviation Administration and the Alaska State Historic Preservation Officer Regarding the Nanwalek and Port Graham Airport at Nanwalek and Port Graham, Alaska, State Project No. 52250* that was executed on September 18, 2012, in compliance with Section 106 of the National Historic Preservation Act. The Bureau of Indian Affairs and the Alaska Department of Transportation & Public Facilities are invited signatories to this agreement; and the Nanwalek IRA Council, Port Graham Village Council, Port Graham Corporation, and Chugachmiut are concurring parties.

If you wish to contact me, I can be reached at the address above, by telephone at 907-271-5454 or by e-mail at Patricia.Sullivan@faa.gov.

Sincerely,

Patricia A Sullivan

Patricia Sullivan
Environmental Program Manager

Enclosure:

Memorandum of Agreement between the Federal Aviation Administration and the Alaska State Historic Preservation Officer Regarding the Nanwalek and Port Graham Airport at Nanwalek and Port Graham, Alaska, State Project No. 52250

Electronic cc w/o enclosures:

Brian Elliott, Central Region DOT&PF, Regional Environmental Manager
Valerie Gomez, Central Region DOT&PF, Cultural Resources Specialist
Morgan Merritt, P.E., Central Region DOT&PF, Project Manager
Laurie Mulcahy, Statewide DOT&PF, Cultural Resources Manager
Teresa Zimmerman, Central Region DOT&PF, Environmental Analyst