

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

OFFICE OF HISTORY AND ARCHAEOLOGY

SARAH PALIN, GOVERNOR

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

January 18, 2008

File No.: 3130-1R FHWA KABATA

David Miller
 Division Administrator
 Federal Highway Administration
 PO Box 21648
 Juneau, AK 99802

Federal Highway
 Administration

JAN 22 2008

Juneau, Alaska

Subject: Knik Arm Crossing – Final Environmental Impact Statement

Dear Mr. Miller:

This office received the Knik Arm Crossing Final Environmental Impact Statement on January 8, 2008. With the significant potential impacts associated with this undertaking, we took time to participate in the National Environmental Policy Act (NEPA) process as well as consult under the National Historic Preservation Act (Section 106). Over the last two years, we have asked for a comprehensive look at the undertaking, a re-evaluation of the Area of Potential Effects and an evaluation of the intensity of the resultant impacts. These concerns are unresolved and unaddressed.

Comment 1

FHWA did not take into consideration the impacts to cultural resources to determine the preferred alternative. To nearly every submitted comment concerning cultural resources, FHWA responded by saying, "Under the Section 106 process (36 CFR 800), FHWA found that the Erickson Alternative will have an adverse effect on the Government Hill Urban Renewal District, and the Alaska State Historic Preservation Office (SHPO) concurred with this finding (letter dated 7-13-2006). Under the 106 process, a Memorandum of Agreement (MOA) is being developed to address mitigation for adverse effects." Deferring to the Section 106 process demonstrates that impacts to historic properties were not given adequate consideration during the alternative decision-making process.

Comment 2

There are still unknown impacts to historic properties that were not considered during the decision making process. A common response to our comments was, "The specific extent of adverse impacts to the Government Hill Urban Renewal Historic District will not be known in detail until specific design elements are developed." Please explain how this unknown was taken into consideration during the decision making process. Could the potential design increase direct, indirect and cumulative impacts to this significant historic district? Are there design alternatives that still must be considered?

Comment 3

FHWA did not address the intensity of the impacts to the resource. The Government Hill Urban Renewal Historic District will lose 15% of its eligible duplexes, 33% of its pre-Urban Renewal resources, and an entire designed streetscape. These are only the direct impacts. The severity of these direct impacts to the first urban renewal project finished in the western United States was

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- Comment 3 continued not considered. Demolition of an entire streetscape in the historic district greatly impacts the qualities that make the district eligible for inclusion in the National Register of Historic Places.
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- Comment 4 FHWA did not adequately address indirect and cumulative impacts. In response to our comment regarding noise, FHWA said the issue was considered in the Noise Impacts Section. Our concern is how noise will impact the qualities that make this district eligible for inclusion in the National Register of Historic Places. This concern was not considered in the Noise Impacts Section. The district was built after Elmendorf Air Field so the air noise existed; however, vehicular noise is different and must be considered.
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- Comment 5 Visual impacts will not be completely mitigated by the tunnel. The tunnel emerges before entering the Government Hill Urban Renewal Historic District. The road grade meets the existing topography while still in Government Hill. To accommodate industrial activity, the viaduct will be taller than the buildings in the historic district. How will the introduction of this new element near the boundaries of the historic district impact the visual characteristics that make this district eligible for the register?
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- Comment 6 The potential impact to archaeological resources from development on the Matanuska Susitna Borough side of the project is still not addressed. We acknowledge that FHWA has funded initiation of a Historic Preservation Plan for areas that will be impacted by the bridge. However, not enough data exists on where prehistoric and historic sites are located. More archaeological survey is needed west of Knik Arm to adequately evaluate the potential impacts from development.
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- Comment 7 Simply documenting the destroyed buildings, offering to sell the impacted buildings and supplying a very nominal amount of planning money does not appropriately compensate for the loss of an entire streetscape of an important historic district. Further, it does not mitigate the impacts to cultural resources on the Matanuska Susitna side of the project. The potential impacts
- Comment 8 to historic properties in downtown, Ship Creek, Fairview and Midtown are not mentioned in the document. With the preferred alternative, we recommend using the listed mitigation in the FEIS
- Comment 9 and adding \$1 million for historic preservation in the Matanuska Susitna Borough and \$1 million for historic preservation in Anchorage and funding the Anchorage Historic Preservation Officer position for three years to administer this fund.
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Sincerely,

Jean M. Anderson

Judith E. Bittner
Deputy State Historic Preservation Officer

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