



## United States Department of the Interior

### NATIONAL PARK SERVICE

Denali National Park & Preserve  
Mile 237 Parks Highway  
P.O. Box 9  
Denali Park, AK 99755



IN REPLY REFER TO:  
D30 (DENA)

June 28, 2019  
Ms. Judith Bittner  
State Historic Preservation Officer  
Department of Natural Resources  
Office of History and Archaeology  
550 W. 7<sup>th</sup> Avenue, Suite 1310  
Anchorage, Alaska 99501-3565

Dear Ms. Bittner,

On June 25<sup>th</sup> we were alerted that the contractor for the project to replace culverts at Mile Post (MP) 62.7 and 63 of the Denali Park Road (please reference the CR 2018- DENA-017 sent to your office on October 9<sup>th</sup> 2018) had started construction on the bypass lane at MP67.2 sometime in the preceding four days. The contractor began working without submitting required paperwork to the Park or Federal Highways. They also began this work without letting their assigned Federal Highways monitor know they were beginning construction.

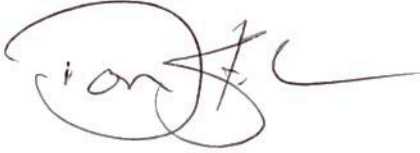
As detailed in the contract and in the report sent to your office, the bypass was supposed to be constructed on top of the existing tundra. Geotextile fabric should have been placed on top of the intact vegetation and then the road constructed above that to minimize the damage to the vegetation and the scarring from the bypass road. This plan would have minimized the visual impact of the bypass lane and facilitated expedient regrowth of the vegetation.

The contractor did not use the fabric or follow the specifications of the contract for the construction of the bypass lane. Rather, they bladed off the vegetation and organic soil down to glacial till to create the bypass road. Also, the erosion control wattles, which were supposed to be set on top of the existing vegetation were also placed in excavated soil. On June 26<sup>th</sup> we sent an archeology crew to the location to assess the damage and survey the disturbed area for cultural resources; please see attached report for details of this survey. In summary no new cultural resources were found and the area disturbed is estimated to be 1,400 square meters.

By removing the vegetation in this way the visual scar from the bypass lane will persist and will adversely affect the Park Road Historic District (HEA 429/MMK-171) and the iconic view west from Stony Dome. We are now approaching this project as "Historic Properties Adversely Effected" (36 CFR Part 800.5(1) (a)).

To mitigate this adverse effect we are proposing to revegetate the disturbed area and we look forward to working with you and other consulting party's on memorandum of agreement (MOA) to minimize this adverse effect. We appreciate your time and consideration in this matter. DENA is requesting SHPO response within 30 days of receipt of this letter per 36 CFR 800.3(c). If you have any questions concerning this project, please contact Phoebe Gilbert at (907) 683-9540, or by email at [phoebe\\_gilbert@nps.gov](mailto:phoebe_gilbert@nps.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Erika Jostad", with a large, stylized loop at the beginning and a horizontal line extending to the right.

Erika Jostad  
Acting Deputy Superintendent

Enclosures as stated  
Cc: Phoebe Gilbert (DENA)