U.S. ARMY GARRISON
FORT WAINWRIGHT

INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN

2013

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U.S. ARMY GARRISON FORT WAINWRIGHT

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EXECUTIVE SUMMARY

The primary mission of U.S. Army Garrison, Fort Wainwright, Alaska (USAG FWA) is to provide the Army the installation capabilities and services to support expeditionary operations and to provide a quality of life for Soldiers and Families commensurate with their service. USAG FWA provides training areas for active duty personnel, National Guard and Reserve units, law enforcement, and civic groups. Fort Wainwright is home to units of the U.S. Army Alaska (USARAK) including the 1-25 Stryker Brigade Combat Team, 16th Combat Aviation Brigade, and Medical Activity Alaska.

Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, specifies Army policy for cultural resources management including the development of integrated cultural resources management plans for planning purposes. The Installation Management Command (IMCOM) directs and assists its installations with Cultural Resources Programs consistent with AR 200-1. The Garrison Commander has direct responsibility for establishing an installation's Cultural Resources Program by means of a plan that successfully integrates cultural resources management within the process of achieving daily mission objectives.

This document follows the requirements for the preparation of an ICRMP as defined in AR 200-1. The text is designed to serve as a plan for the integrated management of the historic properties contained within the limits of USAG FWA-managed lands. While not a decision-making document, this plan provides the Garrison Commander and those responsible for implementing the Commander's decisions with the information necessary to make informed decisions regarding the treatment of cultural resources managed by USAG FWA. As a result, USAG FWA personnel involved in planning activities are the intended audience of this document. This includes, in particular, the Cultural Resources Manager who is the individual responsible for the day-to-day management of cultural resources at USAG FWA.

The ICRMP contains a set of policies that will enable USAG FWA to meet its legal responsibilities for the management of Fort Wainwright's cultural resources. This ICRMP applies to all lands and properties managed by USAG FWA including (but not limited to) Main Post, Yukon Training Area, Tanana Flats Training Area, Donnelly Training Area, Gerstle River Training Area, Black Rapids Training Area, Whistler Creek Training Area, Whittier Terminal, Seward Recreational Area, Haines Fuel Terminal, Tok Fuel Terminal, and Sears Creek Pump Station.

Included in this text is a five-year plan that outlines projects currently proposed in USAG FWA's Master Plan and the possible impacts associated with those activities. In addition to specifics, this document also provides for routine activities that may have an impact on cultural resources. The plan further identifies various public consultation requirements, including parties that should be consulted. It also provides goals that would benefit the management of cultural resources at Fort Wainwright. These goals, listed below, should be considered as recommendations and not as requirements.

- Ensure good stewardship of historic properties by tracking and maintaining our current and future agreements.
- Educate and reach out to the installastion's community and improve understanding within the Directorate of Public Works (DPW).
- Continue maintaining compliance with applicable cultural resource laws and regulations.
- Complete surveys and evaluate archaeological sites according to potential mission impacts.
- Monitor maintenance needs for USAG FWA's historic properties.
- Continue consultation with Alaska Native tribes that have a historical association with the geographic region.

1 INTRODUCTION

An Integrated Cultural Resources Management Plan (ICRMP) is intended to serve as the primary tool for the implementation of a facility's Cultural Resources Program. The ICRMP is a planning document that assists USAG FWA in supporting mission requirements by ensuring that activities conducted as part of its mission address cultural resource management issues and legal compliance requirements. Specifically, this document is designed to serve as a component of the USAG FWA overall planning, to complement other facility plans such as the Integrated Natural Resources Management Plan, and to provide the Garrison Commander with the information necessary to make informed decisions regarding the cultural resources under his or her control. The policies included in this plan are designed to ensure that USAG FWA makes informed decisions regarding the cultural resources under its control in compliance with public laws, in support of the military mission, and consistent with sound principles of cultural resources management.

The centerpiece of cultural resources planning and resourcing is the ICRMP. The key to the successful balance of mission requirements and cultural resources compliance and management responsibilities is early planning and coordination to prevent conflicts between the mission and the resources. A cultural resources management plan guides the Cultural Resources Program at each installation and is the Garrison Commander's primary tool for planning and integration of cultural resources compliance and management activities into the military mission.

Implementation of the ICRMP measures, maintains, protects, and enhances cultural resources and associated historic properties. An ICRMP is prepared to assist Garrison Commanders in their efforts to conserve and protect cultural resources consistent with the use of military installations to ensure the preparedness of the Armed Forces. ICRMPs are intended principally to assist in the effective management of cultural resources and, in so doing, ensure that installation lands remain available and in good condition to support the installation's military mission (i.e., ensure "no net loss in the capability of military installation lands to support the military mission of the installation").

1.1 ICRMP Purpose and Organization

The primary purpose of this ICRMP to establish cultural resources goals, objectives, and policies that USAG FWA will use to identify and manage its historic properties in Alaska. It is the intent of Department of Defense (DoD) to clearly and openly express these goals, objectives, and policies to the public through this ICRMP. The secondary purpose of this ICRMP is to guide USAG FWA cultural resources managers and personnel in their decision-making regarding management of historic properties in Alaska and the implementation of proposed cultural resource projects. Implementing this ICRMP would provide a Cultural Resources Program that protects historic properties as an essential asset for training, provides excellent stewardship, complies with environmental laws, and integrates operations to further protect historic properties. Another purpose of this ICRMP is to serve as a funding identification document for the management of cultural resources on military lands. This document follows the recommendations for the preparation of an ICRMP as outlined in the DoD Instruction 471516. The ICRMP is organized as follows:

The Introduction (Section 1) provides important information regarding Army policy and mission, a summary of the major components of the plan, a listing of partnerships, and a brief review of cultural resources laws and regulations. Also included is a discussion of overlapping management responsibilities.

The Historical and Geographic Context (Section 2) includes a description of the installation and its infrastructure. It also presents an analysis of the cultural landscape which includes a discussion of the

natural environment, an overview of the development of the installation (including historic and prehistoric contexts), its architectural resources, and historic landscape.

The Cultural Resources Inventory (Section 3) provides a review of existing cultural resources including archaeological sites, buildings, structures, objects and traditional cultural properties. A summary of previous archeological and architectural surveys, studies, and management plans is also provided. Potential cultural resources yet to be identified are discussed as well.

The Future Requirements and Goals (Section 4) describe plans for completion of needed inventories and the identification and prioritization actions required to implement goals and objective of the ICRMP.

The Management Plan (Section 5) addresses the cultural resources requirements for the management of the resources described in Section 3. This includes a discussion of the roles and responsibilities of staff, internal and external coordination procedures for facility activities that may directly or indirectly impact cultural resources, and Standard Operating Procedures (SOPs) for cultural resources actions. Within the text outlining external coordination procedures is a discussion of the involvement of the interested public, including Alaska Native tribes. Actions not requiring project by project coordination with the consulting parties, as outlined in the USAG FWA's Operations and Management Programmatic Agreement (O&M PA), are addressed. This section also includes discusses public participation in the cultural resources compliance process, as well as, current public education efforts and recommendations for future public education and outreach.

Implementing the ICRMP (Section 6) describes how USAG FWA plans to implement the goals and objectives found within the ICRMP. Also, it describes how the ICRMP helps achieve a no net loss to the military mission and helps sustainability of the mission. It also discusses the partnerships, contracts, and other organizational and funding element important to the implementation of the ICRMP.

Appendices (A through I) have been added to supplement the report sections presented in the body of the ICRMP. These include: (A) Historic Buildings and Structures Surveys, (B) Summary of National Register of Historic Places Criteria for Evaluation, Criteria Considerations, and Definitions of Integrity and Historic Context, (C) The Ladd Field National Historic Landmark Nomination Package, (D) Glossary of Commonly Used Terms (E) List of Commonly Used Acronyms, (F) List of Archaeological Sites (G) Bibliography of Reports on USAG FWA-managed lands (H) Government-to-Government and Tribal Consultation Standard Operating Procedure, (I) Historic Buildings Inspection Form, and (J) Citations.

1.2 Changes from Previous ICRMP

The previous ICRMP was completed in 2001. Since then, a number of new historic properties have been added, including 463 archaeological sites. Ten contributing resources to the Ladd Air Force Base Cold War Historic District (Cold War Historic District) were demolished. The number of contributing resources was further reduced when the district was re-evaluated in 2010. During that re-evaluation, the boundary to the Cold War Historic District was reduced, removing an additional twenty-two buildings from the district. One Ladd Field NHL contributing resource, Hangar 6, was destroyed by a fire. One historic building and one historic structure have been added, and two building that were previously part of the Cold War District are now treated as individually eligible buildings.

1.3 Updating and Implementing of the ICRMP

AR 200-1 directs that ICRMPs be re-evaluated periodically and updated if necessary. In certain cases involving major changes such as mission change and realignment or closure determinations, the ICRMP should be re-evaluated prior to the five-year review point to determine if it still meets mission requirements or if it should be revised. Other events, such as the adoption of a Programmatic Agreement (PA), can also necessitate the revision of portions of the ICRMP prior to planned reviews.

The following section discusses the definition and funding implications of implementation. Implementation anticipates the execution of all high priority projects and activities in accordance with specific timeframes identified in the ICRMP.

An ICRMP is considered to be implemented if an installation:

- Actively requests, receives, and uses funds for high priority projects and activities.
- Ensures that sufficient numbers of professionally trained cultural resources management personnel are available to perform the tasks required by the ICRMP.
- Coordinates annually with all internal and external cooperating offices.
- Documents specific ICRMP action accomplishments undertaken each year.

Cultural resources requirements defined as high environmental priority are those projects and activities required to meet recurring cultural resources conservation management requirements or current cultural resources compliance needs.

Not all projects listed in an ICRMP are necessarily high priority. The responsibilities of implementing an ICRMP are shared among those entities that use the land and manage facilities (e.g., trainers, facility managers) as well as those who ensure compliance and provide overall program oversight. Accordingly, projects necessary to implement ICRMPs are not limited to environmental funds. However, ICRMPs should include all projects.

1.4 Mission

The United States Army must maintain its capability to put overwhelming land combat power on future battlefields and defeat potential enemies. Decisive victories depend on the Army's ability to rapidly deploy, fight, self-sustain, and win quickly with minimum casualties. As the DoD's premiere land force, the Army relies on land to achieve its training and testing objectives and maintain force readiness. Force readiness depends on high quality, realistic training. The Army must train as it will fight. Realistic training areas and ranges are required to fully train Soldiers. A Soldier does not fire his or her weapon alone in battle. The Soldier's entire squad, platoon, company, and even battalion must coordinate their efforts to prevent any friendly-fire accidents. This skill must be practiced on large-scale training areas and ranges that realistically portray a combat environment before going to war.

To accomplish this goal, the Army has separated garrison installation management and support functions from the warfighter, allowing the warfighter to focus entirely on the training mission. In Alaska, the Army warfighter component, U.S. Army Alaska, contains the units and Soldiers that train, deploy, fight, self-sustain, and win. Fort Wainwright is the home of the 1st Stryker Brigade Combat Team, 25th Infantry Division, also known as the 1-25th SBCT; the 16th Combat Aviation Brigade (Alaska), and Medical Department Activity-Alaska. Installation support operations, such as logistics, public works, and environmental are now known as USAG FWA.

1.4.1 U.S. Army Alaska Mission

The mission of U.S. Army Alaska is to provide trained and equipped forces to rapidly deploy in support of worldwide joint military operations, crisis response, and peacetime engagements; maintain quality of life and force projection platform; and serve as the Army component command to Alaskan Command. U.S. Army Alaska faces several challenges in accomplishing its mission. One of these is ensuring that training facilities are capable of supporting all required training events while integrating environmental stewardship into daily operations. As these critical challenges are met, U.S. Army Alaska also must continue to maintain a positive relationship with local communities as they are integral partners, helping the Army meet its mission needs.

U.S. Army Alaska currently has two major subordinate tactical commands, the 1st / 25th Infantry Stryker Brigade Combat Team and the 4th / 25th Airborne Brigade Combat Team. The mission of the Stryker Brigade Combat Team is "on order, deploy worldwide, secure a lodgment, and conduct military operations in support of US national interests." The mission of the Airborne Brigade Combat Team is to "build, transform, train, deploy, and employ an Airborne Brigade Combat Team that is capable of conducting forcible entry and full spectrum operations anywhere in the world."

1.4.2 U.S. Army Garrison, Fort Wainwright Mission

USAG FWA is obligated to provide the best training for our military forces so that they will be ready to defend our nation in times of crisis. USAG FWA's mission objectives are to (1) plan and execute deployment support, force protection, and contingency operations; (2) plan and execute transformation of the installation that supports Stryker and other mission units; (3) provide quality installation support and service to our customers; (4) provide proper stewardship of all resources and the environment; (5) sustain strong community relations; and (6) provide for the well-being of the Army Family. For generations, Alaska has looked to USAG FWA as the leader in both training and environmental management. USAG FWA will continue this mission without compromise.

1.4.3 Past Mission

Fort Wainwright's (originally named Ladd Field) mission initially focused on cold weather testing of aircraft and associated equipment. With the United States' entry into World War II, the mission was expanded to include supply and repair of aircraft involved in the war effort and to serve as a transfer point for Lend-Lease aircraft to Russia. During the early Cold War years, Ladd Field was the Air Force's sector command center for northern Alaska. Its foremost missions were air defense, strategic reconnaissance, and arctic research (Price 2000). The Army continued operating at Ladd Air Force Base, focusing on anti-aircraft and ground defense, cold weather training, and emergency preparedness for nuclear attack (Denfeld 1988).

In 1961, the Air Force moved its operations to Eielson Air Force Base, 26 miles southeast of Fairbanks, and transferred Ladd to the Army, which renamed it "Fort Wainwright." During the remainder of the Cold War, Army missions at Fort Wainwright included ground defense, Nike missile air defense, aviation support, troop training, logistics, and civil defense assistance. With the activation of the 6th Infantry Division (Light) in 1986, the mission of Fort Wainwright was expanded to include readiness for worldwide deployment. Ground defense, cold weather training, and preparedness for worldwide deployment have been the primary missions of Fort Wainwright in the 1990s, with those missions continuing into the present. Following the deactivation of the 6th Infantry Division (Light) in 1994, Army forces were reorganized under U.S. Army Alaska.

1.5 Management and Responsibilities

Department of Army personnel, at all levels, must ensure that mission requirements are carried out in harmony with statutory and regulatory requirements. Failure to fulfill these requirements could result in halting or delaying ongoing or proposed mission-essential projects, training and testing actions, and could deplete limited financial and staff resources. Proponents of Army actions should coordinate with the USAG FWA Cultural Resources Section early in the planning stage of projects and activities to identify potential cultural resources compliance requirements.

Army Regulation 200-1, *Environmental Protection and Enhancement*, outlines responsibilities with regard to cultural resources legislation for installations, Major Commands, and supporting organizations. Specific responsibilities of the USAG FWA Cultural Resources Program include:

- Develop, approve, and maintain an ICRMP.
- Inventory and evaluate cultural resources located on properties under USAG FWA control and ownership.
- Protect and maintain eligible resources and promote their rehabilitation and adaptive reuse;
- Integrate preservation requirements with planning and management activities of the military mission.
- Cooperate with federal, state, and local agencies, Alaska Native tribes, and the public in cultural resources management.

Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) (DASA [ESOH]): The DASA (ESOH) is the Army's Federal Preservation Officer (FPO) pursuant to designation by the Assistant Secretary of the Army (Installations, Logistics, and Environment) on behalf of the Secretary of the Army. As the Federal Preservation Officer, the DASA (ESOH) is responsible for oversight of the Army's activities under the National Historic Preservation Act.

Assistant Chief of Staff for Installation Management (ACSIM): ACSIM is the Army Staff proponent for the military Cultural Resources Program.

Director of Environmental Programs (DEP): The Director of Environmental Programs carries out the ACSIM Army Staff function for the Army's Cultural Resources Program through the following responsibilities:

- Promulgates cultural resources policy and guidance;
- Identifies, supports, and defends cultural resources requirements and;
- Directs and coordinates Army Staff Cultural Resources Program requirements.

Army Environmental Command (AEC): The Commander, U.S. Army Environmental Command (AEC), under the direction of the DEP, is responsible for a broad range of technical support and oversight services for execution of the Army's Cultural Resources Program worldwide. AEC supports Department of the Army Headquarters (HQDA), IMCOM, and installation cultural resources compliance activities and programs. HQDA technical oversight and review of the Cultural Resources Programs within the Army includes review of Section 106 Programmatic Agreements (PAs) and Memorandum of Agreements (MOAs), NAGPRA Comprehensive Agreements and Plans of Action, other cultural resources agreements and actions, and National Register of Historic Places (National Register) nominations.

- Identification and implementation of actions to address Army-wide cultural resources requirements and shortfalls through analysis of Army programming data, emerging statutory and regulatory requirements, and the Army Environmental Strategic Action Plan.
- Development, execution and management of programs and initiatives to address shortfalls and requirements.

Installation Management Command (IMCOM): IMCOM Regional Directors will direct and assist their installations in the conduct of installation Cultural Resources Programs. Each IMCOM Regional Director will:

- Ensure that cultural resources responsibilities are implemented across all installations;
- Monitor installation Cultural Resources Programs;
- Review ICRMPs, NHPA agreement documents, National Register Determinations of Eligibility and nominations, NAGPRA CAs and Plans of Action. Forward NHPA agreement documents, NAGPRA Comprehensive Agreements and Plans of Action, and National Register nominations to HQDA (AEC) for HQDA review. IMCOM Commanders may also elect to sign NHPA agreement documents, and NAGPRA Comprehensive Agreements and Plans of Action;
- Implement HQDA cultural resources management policy and guidelines in AR 200-1 at their respective installations;
- Provide cultural resources reporting information to HQDA to include, the Installation Status Report (ISR), and the Army Environmental Data Base –Environmental Quality;
- Assist Garrison Commanders in establishing reasonable funding priorities and meeting appropriate milestones in program development and implementation in accordance with this regulation;
- Ensure that installation Cultural Resources Programs are accurately evaluated when conducting environmental compliance assessments pursuant to AR 200-1and;
- IMCOM Regional Directors may delegate any of these responsibilities to Commanders of their Major Subordinate Commands.

Garrison Commander:

- Establish an installation Cultural Resources Program.
- Designate an installation Cultural Resource Manager to coordinate the installation's Cultural Resources Program. The Garrison Commander will ensure that the Cultural Resources Manager has appropriate knowledge, skills, and professional training and education to carry out installation cultural resources management responsibilities. The Garrison Commander will also ensure that all cultural resources technical work (including but not limited to identification, evaluation, and treatment of historic properties, and preparation and implementation of an ICRMP) is conducted by individuals who meet the applicable professional qualifications standards established by the National Park Service in 36 CFR § 61, Appendix A.
- Establish a government-to-government relationship with federally-recognized Indian tribes as needed. If there are significant Native American issues, he or she will also designate an installation Native Liaison to facilitate the government-to-government relationship. The Garrison Commander will ensure that the Native Liaison has appropriate knowledge, skills, and professional training and education to conduct installation consultation responsibilities with Indian tribes.
- Establish a process that requires early coordination between the Cultural Resources Manager and other installation staff elements, tenants, and others in the planning of projects and activities that may affect cultural resources.

- Prepare and implement, if appropriate, an installation-wide NHPA Section 106 PA and an NAGPRA Comprehensive Agreement where required to address and streamline NHPA and NAGPRA compliance procedures for ongoing mission and operations. If an installation-wide NHPA Section 106 PA and NAGPRA Comprehensive Agreement is not prepared, the Commander must ensure that individual undertakings and activities follow NHPA Section 106 (36 CFR § 800) and NAGPRA (43 CFR § 10) compliance procedures.
- Ensure that cultural resources management is integrated with installation training and testing activities, master planning (AR 210-20), environmental impact analysis (AR 200-1), natural resources and endangered species management planning and programming to include Integrated Natural Resources Management Plans (AR 200-1), and the Integrated Training Area Management Program. Ensure that the installation Cultural Resources Program is developed and implemented in accordance with the policies and guidelines set forth in AR 200-1 and in this ICRMP.
- Establish funding priorities and program funds for cultural resources compliance and management activities into the Environmental Program Requirements Report.
- Conduct a comprehensive evaluation of the installation's Cultural Resources Program as part of the environmental compliance assessment required by AR 200-1.
- Develop ICRMPs, cultural resources inventory plans and schedules, NHPA PAs and MOAs, NAGPRA CAs and Plans of Action, and other documents as appropriate, and coordinate such documents with the IMCOM and HQDA in accordance with this regulation.
- Serve as the Agency Official as defined in 36 CFR § 800 with responsibility for installation compliance with the NHPA.
- Serve as the Federal Agency Official as defined in 43 CFR § 10 with responsibility for installation compliance with NAGPRA.
- Serve as the Federal Land Manager as defined in 32 CFR § 229 with responsibility for installation compliance with Archaeological Resources Protection Act (ARPA). ARPA permits are issued by the supporting USACE District Real Estate office upon approval of the Garrison Commander in accordance with ER 405-1-12 and AR 405-80. Garrison Commander approval is provided through the issuance of the Report of Availability to the supporting USACE District Real Estate Office.
- Serve as the Federal Agency Official as defined in 36 CFR § 79 with management authority over archeological collections and associated records.
- Sign NHPA PAs and MOAs, and NAGPRA CAs and Plans of Action, and other installation cultural resources agreements after IMCOM and HQDA comments have been addressed.

Cultural Resources Manager: The Directorate of Public Works (DPW) is tasked with the management of natural and cultural resources through the Conservation Branch of the Environmental Division of DPW. Historic properties management is coordinated through the Cultural Resources Section of the Conservation Branch. The Cultural Resources Manager, appointed by the Garrison Commander, is situated within the Conservation Branch and reports to the Conservation Branch Chief. The Conservation Chief reports to the Environmental Division Chief who reports to the Director of DPW. All personnel in the Cultural Resources Section report to the Cultural Resources Manager.

Unless otherwise stipulated by the Garrison Commander, the Cultural Resources Manager will be the officially designated representative and will implement this ICRMP, which includes reviewing proposed projects, determining undertakings, and making decisions regarding Determinations of Eligibility in consideration of historic properties. The Cultural Resources Manager is also responsible for coordinating with the public, the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and other consulting parties. As the representative of the Garrison Commander, the Cultural Resources Manager is the Point of Contact for all cultural resources concerns and is the initiating party for consultation with interested parties.

Native Liaison: "DoD American Indian/Alaska Native Policy: Alaska Implementation Guidance" encourages the creation of a Native Liaison Officer position to carry out the policy and the Alaska guidance on behalf of the installation. Due to the number of tribes in Alaska, along with the large land holdings of the U.S. Army in the state, a full-time, dedicated Native Liaison is a part of the USAG FWA staff, housed in the Directorate of Public Works, Environmental Division. An Army representative employed directly by the Army or an Intergovernmental Personnel Act position is most effective, having a greater authority to speak on the Army's behalf and thus more aptly fulfilling the government-to-government relationship. The duties of the Native Liaison include, but are not limited to, the following:

- Serve as the established USAG FWA Point of Contact for tribes;
- Maintain a list of federally-recognized tribal governments in Alaska with current contact information for heads of each tribal government and secondary contacts;
- Maintain a list of all tribal ordinances or regulations involving consultation protocol, as well as any MOA or Comprehensive Agreement in effect between USAG FWA and individual tribes and tribal organizations;
- Provide briefings to the Garrison Commander and other officers/staff as appropriate on current issues involving tribes and potential conflicts;
- Draft correspondence to tribes for signature by the Garrison Commander when initiating consultation;
- Maintain a file on each tribe with which USAG FWA interacts;
- Identify the departmental programs within the Army that have potential to affect tribal lands, resources and interests, and the individuals responsible for developing and implementing those programs, projects and activities that have the potential to affect tribal governments;
- Maintain contact with other DoD Native Liaisons to keep informed and ensure coordination between military components;
- Provide training on American Indian/Alaska Native legal and cultural issues for pertinent Army personnel such as public affairs, protocol, environmental planners or cultural resource management staff who may be involved in issues of importance to tribal governments;
- Respond to all tribal concerns and inquiries;
- Publish and distribute a regular USAG FWA update newsletter directed exclusively to tribal governments containing information on current and future Army projects including pending Environmental Assessments and Environmental Impact Statements, wildlife issues, hunting permits and restrictions and other topics;
- Maintain awareness of current events involving Alaska Native tribes;
- Organize working groups, as needed, consisting of tribal representatives and Army staff to discuss upcoming Army projects and to keep tribes informed of current events;
- When appropriate, ensure invitations are sent to tribal leaders for specific events or those open to the public, such as Change of Command; and
- Engage in efforts to improve and enhance government-to-government relations with the tribes through regular and open dialogue and partnering agreements (as authorized).

1.6 Partnerships

USAG FWA recognizes the contributions that interested parties and tribes can make to the management of historic properties. To that end, USAG FWA's goal is to develop partnerships for the completion of collaborative research and work. These could include such entities as Alaska Native tribes, the SHPO and other state agencies, the National Park Service (NPS), and universities.

1.6.1 Alaska Native Tribal Partners

Federally-Recognized Tribes:

Alatna Village
Allakaket Village
Anvik Village
Arctic Village (See Native Village of Venetie Tribal Government)
Beaver Village
Birch Creek Village
Chalkyitsik Village
Chilkat Indian Village (Kluckwan)
Chilkoot Indian Association (Haines)
Circle Native Community
Village of Dot Lake
Native Village of Eagle
Evansville Village (AKA Bettles Field)
Native Village of Fort Yukon
Galena Village (AKA Louden Village)
Organized Village of Grayling (AKA Holikachuk)
Healy Lake Village
Holy Cross Village
Hughes Village
Huslia Village
Village of Kaltag
Koyukuk Native Village
Manley Hot Springs Village
McGrath Native Village
Native Village of Minto
Nenana Native Association
Nikolai Village
Northway Village
Nulato Village
Rampart Village
Native Village of Ruby
Shageluk Native Village
Skagway Village
Native Village of Stevens
Takotna Village
Native Village of Tanacross
Native Village of Tanana
Telida Village
Native Village of Tetlin
Village of Venetie (See Native Village of Venetie Tribal Government)
Native Village of Venetie Tribal Government (Arctic Village and Village of Venetie)

Non-Federally-Recognized Alaska Native Entities and Organizations:

Doyon, Ltd.
Fairbanks Native Association
Tanana Chiefs Conference
Tok Native Association

1.6.2 Other Partners

Alaska Anthropological Association
Alaska Association for Historic Preservation
Alaska Historical Commission
Alaska Historical Society
Fairbanks Historic Preservation Foundation
Fairbanks North Star Borough Historic Preservation Commission
Festival Fairbanks
Interior and Arctic Alaska Aeronautical
Tanana-Yukon Historical Society
University of Alaska Museum of the North

Alaska State Historic Preservation Officer (SHPO): The SHPO located in the Office of History and Archaeology, a state agency, is responsible for carrying out the National Register Programs in Alaska, statewide historic preservation planning, statewide survey and inventory of historic properties, and administering the federal historic preservation grants-in-aid program. These programs were established

under the NHPA and many of the programs are conducted in partnership with the U.S. Department of the Interior and the NPS, Alaska Region. With these programs as the tools, the SHPO works with USAG FWA, interested tribal governments, and concerned citizens to insure that USAG FWA's significant archaeological and historic properties are taken into account when planning activities that potentially could affect them.

Advisory Council on Historic Preservation (ACHP): ACHP is the independent federal agency established by the NHPA to comment on federal undertakings and to encourage federal agencies to consider historic properties in their project planning. ACHP's regulations, titled "Protection of Historic Properties" (36 CFR § 800), govern the Section 106 review process. ACHP contributes to USAG FWA's historic property management by participating as needed in undertakings and in the development of agreement documents.

National Park Service (NPS): The NPS, acting for the Secretary of the Interior, administers both the NHLs and the National Register programs. The NPS National Register is America's official list of cultural properties worthy of preservation. It includes districts, sites, buildings, structures, and object of local, state, or national significance. National Historic Landmarks (NHLs) are nationally significant historic places designated as such by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. NPS provides technical preservation advice to owners of NHLs.

Bureau of Land Management (BLM): Military lands at Fort Wainwright training areas are in land withdrawal status from the BLM. Because of this status, USAG FWA and BLM have shared management responsibilities over training areas outside of cantonment areas. USAG FWA has the lead in meeting Section 106 obligations for USAG FWA undertakings. BLM is responsible for meeting Section 106 obligations when an undertaking is a third-party action and not a USAG FWA action. BLM also issues permits to third parties for archaeological activities on BLM-managed lands and withdrawn lands. USAG FWA should provide BLM with copies of Section 106 reports of archaeological activities conducted on withdrawn lands. Consultation and communication are standard management practices between the agencies.

1.7 Statutes and Regulations

A large body of federal legislation, regulations, and executive directives exists that outlines the responsibilities of federal agencies for preservation of cultural resources and provides procedural guidelines for the management of federally owned or controlled properties. This section identifies the basic compliance requirements associated with the major federal cultural resources laws and regulations applicable to Army activities. USAG FWA is responsible for managing cultural resources in accordance with relevant federal laws and regulations.

Among the federal laws of primary importance to Fort Wainwright are the National Historic Preservation Act, the National Environmental Policy Act, the Archeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. Accompanying regulations, particularly AR 200-1, prescribe management responsibilities and standards of treatment for historic properties. The following text outlines Fort Wainwright's legal responsibilities for the identification, evaluation, and treatment of historic properties under its jurisdiction.

1.7.1 Applicable Federal Laws

Antiquities Act

The Antiquities Act of 1906 [16 USC § 431-433] authorizes the President to designate historic and natural resources located on federally owned or controlled land as National Monuments. The act provides protection to prehistoric and historic ruins and objects by providing criminal sanctions against excavation, injury, or destruction of those resources. The Departments of the Interior, Agriculture, and Defense can issue permits to recognized educational and scientific institutions for archeological investigations. Permits are issued by the USACE District Real Estate Office on the approval of the Garrison Commander.

National Historic Preservation Act (NHPA)

NHPA of 1966, as amended through 2004, is the cornerstone of federal cultural resources management law. It is the responsibility of the federal government to be a leader in preservation, stating that government agencies should "provide leadership in the preservation of the prehistoric and historic properties of the United States and ... administer federally owned resources in the spirit of stewardship for the inspiration and benefit of present and future generations" [NHPA, § 2(2) - 2(3)]. NHPA establishes a national historic preservation program that includes elements for identification, evaluation, and protection of cultural resources. It presents a policy of supporting and encouraging the conservation of historic properties or historic properties (the terms used to refer to "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register, including artifacts, records, and material remains related to such a property or resource"[16 U. S. C. § 470w(5)]) by directing federal agencies to assume responsibility for those cultural resources under federal jurisdiction judged to be significant.

The act authorizes the Secretary of the Interior to expand and maintain the National Register, which is composed of historic properties consisting of buildings, sites, structures, and objects determined significant in American history, architecture, archaeology, engineering, and culture. The act directs the Secretary of the Interior to set forth procedures for nominating historic properties to the National Register by establishing criteria to determine those cultural resources that are eligible for inclusion. The term "eligible for inclusion in the National Register" encompasses those properties formally determined as eligible and all other properties that meet the National Register criteria as defined by 36 CFR § 60.4. The Department of the Interior has issued guidelines [36 CFR § 60] that describe identification and evaluation procedures for federal agencies to request DOEs [36 CFR § 63].

NHPA further directs the Secretary of the Interior to establish a SHPO, who directs and approves state preservation programs, and who, with the cooperation of private organizations, local governments, and state and federal agencies, identifies and inventories cultural resources within the state and ensures that eligible properties are protected. Through the act, a National Historic Preservation Fund and a grant program authorize funds to the states for historic preservation projects and to individuals for the preservation of historic properties. NHPA authorized the establishment of ACHP, which is to act as an independent federal agency to advise the President, Congress, and other federal agencies on historic preservation matters; to review the policies and programs of federal agencies; and to inform and educate federal agencies on matters relating to historic preservation.

Of particular importance to military installations are Section 106 and Section 110 of NHPA. Section 106 requires federal agencies to consider effects of undertakings on resources listed in or eligible for inclusion in the National Register. Section 110, part of a 1980 amendment, requires federal agencies to institute programs to identify, evaluate, and nominate National Register eligible cultural resources under their care. Compliance with preservation requirements on military lands is largely compliance with these sections of

NHPA. Numerous federal regulations, orders, and instructions elaborate upon and clarify these provisions of NHPA and the compliance process.

PAs and MOAs are executed pursuant to NHPA Section 106 and 36 CFR § 800 and are compliance agreements that set forth how USAG FWA will avoid, minimize, or mitigate adverse affects to historic properties. Section 106 PAs that address and define ongoing installation-wide undertakings associated with mission activities and their effects on historic properties over a five year programming and budgeting cycle or longer are encouraged because they can streamline the NHPA compliance process and serve as a program management tool. Any management procedures and determinations provided in PAs and MOAs should be integrated into the ICRMP. However, NHPA PAs and MOAs will not refer to or implement an ICRMP.

Section 106 [16 U.S .C. 470f] of NHPA ensures that cultural resources are properly considered in the planning stage of any federal agency activity. Federal agencies are required to consider the effects of their undertakings on any properties eligible for inclusion or listed on the National Register during the planning stage and to provide ACHP an opportunity to comment. This process is detailed in implementing regulation 36 CFR § 800 (*Protection of Historic Properties*). An undertaking is defined as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; those requiring a federal permit, license, or approval; and those subject to state or local regulation administrated pursuant to a delegation or approval by a federal agency.

Failure to take the effects of an undertaking on historic properties into account in accordance with NHPA Section 106 and 36 CFR§ 800 can result in formal notification from ACHP to the Secretary of the Army of foreclosure of ACHP's opportunity to comment on the undertaking pursuant to NHPA. A notice of foreclosure can be used by litigants against the Army in a manner that can halt or delay critical mission activities.

USAG FWA will ensure that the efforts to identify, evaluate, and treat historic properties follow *The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* and are conducted under the supervision of personnel who meet the applicable professional qualifications standards set forth in 36 CFR § 61, Appendix A. Disagreements between the Garrison Commander and SHPO regarding the eligibility of a property for listing in the National Register will be resolved through the procedures at 36 CFR § 63.2(d).

Section 106 does not require that an undertaking be stopped, but that reasonable efforts must be made to minimize harm to eligible properties. The reissued 36 CFR § 800 regulation (effective August 5, 2004) provides for increased involvement with additional consulting parties. These consulting parties include the SHPO, the Tribal Historic Preservation Officer when applicable, Native American tribes, local governments, applicants for federal permits or licenses, and the public, including individuals and organizations which have a demonstrated interest in the outcome of any undertaking [36 CFR § 800.2(c)]. Further discussion of the involvement of consulting parties in the Section 106 process can be found in 36 CFR § 800.3 - 36 CFR § 800.7, 36 CFR § 800.10, and 36 CFR § 800.12.

Section 110 of NHPA states that the federal agency must assume responsibility for the preservation of historic properties that are owned or controlled by the agency and that the federal agency should use, to the maximum extent possible, historic structures that are available. Section 110 reinforces the responsibilities of the federal agency to inventory, evaluate, and preserve historic properties. It is the responsibility of the agency to establish a program to locate, inventory, and nominate to the Secretary of the Interior all cultural resources that appear to qualify for inclusion in the National Register. Each agency is required to ensure that no potentially National Register eligible historic property is inadvertently

transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly. If federal actions will substantially alter or destroy a National Register-eligible property, sufficient time and effort must be expended to properly record the property. Section 110 also dictates that planning and actions necessary to minimize harm to National Historic Landmarks will be undertaken when an undertaking may adversely affect such properties.

Section 110 of the NHPA imposes specific responsibilities upon USAG FWA regarding historic preservation. In accordance with Section 110 (a) (1), the affirmative preservation responsibilities in Section 110 must be undertaken in a manner consistent with the installation's mission. Such responsibilities include but are not limited to:

- Establish a historic preservation program to include the identification, evaluation and nomination of historic properties to the National Register in consultation with ACHP, SHPO, local governments, Alaska Native tribes, and the interested public as appropriate.
- Prior to acquiring, constructing, or leasing buildings, use available historic properties to the maximum extent feasible.
- Document historic properties that will be altered or destroyed as a result of Army action. Such actions must be reviewed in accordance with NHPA Section 106.
- In transferring Army historic properties, ensure that the significant historic values of the property are appropriately preserved.
- The Secretary of the Army must document decisions to proceed with Army undertakings that adversely affect historic properties when the Garrison Commander has been unable to reach agreement through execution of a MOA or PA with ACHP and SHPO.

Section 111 of NHPA complements the directives of Section 110 by addressing the responsibilities of a federal agency concerning adaptive use, lease, exchange, or management of federal historic properties. It requires Garrison Commanders, to the extent practicable, to implement adaptive uses for historic properties that are not needed for current or projected agency purposes. After consultation with the ACHP, agencies may lease or exchange historic properties if the action is compatible with preservation.

Section 112 of NHPA requires that all research, preservation, and protection activities be conducted by persons meeting professional standards developed by the Secretary of the Interior, including both agency and contractor personnel. Personnel responsible for the management of historic properties are required to meet the Secretary of the Interior's standards. All data produced by research is to be maintained permanently in appropriate databases.

Section 304 of NHPA authorizes the head of a federal agency to withhold from public disclosure any information about the location, character, or ownership of a historic property if that disclosure might cause invasion of privacy, might cause harm to the resource, or might impede the use of a traditional religious site by practitioners. Only a Freedom of Information Act filing can make such information available.

National Environmental Policy Act (NEPA)

NEPA of 1969 [42 USC § 4321] establishes a national policy that encourages productive and enjoyable harmony between us and our environment, to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; and to enrich the understanding of the ecological systems and natural resources important to the nation. Under NEPA, federal agencies are required to preserve important historic, cultural, and natural aspects of our national heritage. The act

requires all federal agencies to prepare a document, most commonly an Environmental Assessment (EA), which assesses the potential impacts of any proposed action on the environment. If impacts are judged potentially significant, an Environmental Impact Statement (EIS) must be prepared. An EIS identifies any unavoidable adverse environmental effects, as well as alternatives to the proposed action, prior to its implementation. The EIS will be prepared as early in the planning process as possible and will accompany the action's proposal through the agency review process. NEPA's implementation regulations [40 CFR § 1500-1508) clarify that the act in no way directs, replaces, or supersedes NHPA. Substitution of the NEPA process has been identified as an alternative process for consideration of impacts to historic properties and is procedurally defined in 36 CFR § 800.8.

Impact assessments under NEPA must consider the effects of proposed federal actions on cultural resources and the effects on Indian tribes, Alaskan Natives, and other ethnic and social communities to whom the cultural resources may have importance. The information needed to make such impact assessments may be acquired from information developed as a result of compliance with cultural resources statutes, regulations and executive orders.

Archeological Resources Protection Act (ARPA)

ARPA of 1979 [16 USC§ 470] establishes that archeological resources on public lands are part of the nation's heritage and should be preserved for the benefit of the American people. Unauthorized excavation, removal, damage, alteration, or defacement of archeological resources on public lands is prohibited. ARPA sets forth criminal and civil penalties for such violations. The act requires a permit for any excavation or removal of archeological resources from public lands that is not sponsored by the federal agency. Such excavations must be of a scientific nature and must be conducted by qualified applicants. Individuals should comply with *The Secretary Of The Interior's Professional Qualifications Standards*. All archeological resources removed from public lands under the permit remain the property of the federal government.

The permit-granting authority usually belongs to the land manager responsible for the property. The U.S. Army Corps of Engineers District Real Estate Division grants permits for Army installations, but because of the co-management responsibilities of BLM for most of Fort Wainwright's publicly withdrawn land, the local Fairbanks BLM office handles the majority of ARPA permitting for USAG FWA. Although permits are not required for work contracted by the federal agency, a permit might be required for work conducted in investigations related to NAGPRA (e.g., recovery of Native American human remains from a vandalized site). Acquiring a permit under ARPA regulations does not constitute compliance with Section 106 of the NHPA.

Federal agencies may withhold any information pertaining to the location of archeological sites if the agency determines that disclosing such information would put the resource at risk (Section 304 of the NHPA). This procedure, by itself, provides limited protection of such information. The use of Section 304 of NHPA and ARPA to exclude the release of sensitive information (on all archaeological sites National Register eligible, National Register not eligible, archaeological sites with a NAGPRA component, and sacred sites with an archaeologically defined component) is the most effective procedural strategy [32 CFR § 800 229.18(a)(1-2)].

The act's implementing regulations for the DoD [32 CFR § 229] specify that protected resources must be at least 100 years old and of archaeological interest. Rocks, coins, bullets, and minerals are excluded from protection. Paleontological specimens found outside archeological contexts are similarly excluded from protection.

The Antiquities Act and ARPA prohibit the excavation, collection, removal, and disturbance of archeological resources (as defined by ARPA) and objects of antiquity (as referenced in the Antiquities Act) on federally owned Army property without a permit issued by the USACE District Real Estate Office or the BLM, depending on the type of land withdraw in question, and with the approval of the Garrison Commander. Violation of ARPA may result in the assessment of civil or criminal penalties and forfeiture of vehicles and equipment that were used in connection with the violation.

The use of metal detectors to locate archeological resources is prohibited on Army installations except when used by Army personnel, contractors, or permittees in association with official cultural resources management activities or pursuant to a permit issued under ARPA.

ARPA permits for archeological investigations that may result in the excavation or removal of Native American human remains and other cultural items as defined in NAGPRA, or in the excavation of archeological resources that are of religious or cultural importance to federally-recognized Indian tribes, will be issued in accordance with AR 405-80. The Alaska USACE District Real Estate Office will issue the permit after the Garrison Commander conducts consultation in accordance with 43 CFR § 10.5 and 32 CFR § 229.7 with the culturally affiliated tribes. The Garrison Commander provides the USACE District with approval to issue the permit by means of a Report of Availability prepared after necessary consultation and compliance actions have been met. ARPA permits will provide for the disposition of NAGPRA cultural items in accordance with NAGPRA subsections 3(a) and (b) and 43 CFR § 10. The Garrison Commander will ensure that documentation of consultation with culturally affiliated tribes is prepared and maintained as part of the record of each such permit.

USAG FWA will ensure that ARPA permits:

- Comply with the requirements of 32 CFR § 229, 43 CFR § 10.
- Require that any interests which federally-recognized tribes may have in the permitted activity are addressed in a manner consistent with the requirements of NHPA and NAGPRA prior to issuance of the permit.
- Require permitted activities be performed according to applicable professional standards of the Secretary of Interior.
- Require that the excavated archeological artifact collection and associated records are permanently curated in a curation facility that meets the requirements of 36 CFR § 79.

Archaeological resources, objects of antiquity, and significant scientific data from federal installations belong to the installation, except where NAGPRA requires repatriation to a lineal descendant or tribe. Archeological resources, objects of antiquity, and significant scientific data from non-federal land belong to the state, territory, or land owner. Such resources from lands used by the Army but for which fee title is held by another agency are the property of the agency designated as the land manager in the land use instrument (e.g., Public Land Order, Special Use Permit, etc.). Garrison Commanders should ensure that land use instruments allowing for military use are reviewed to determine proper roles and responsibilities.

USAG FWA staff or contractors carrying out official duties associated with the management of archeological resources who meet the professional qualifications and whose investigations meet the requirements of 32 CFR § 229.8 are not required to obtain a permit under ARPA or the Antiquities Act for the investigation of archeological resources on a federally owned or controlled installation, including situations where cultural items as defined by NAGPRA may be excavated. However, in situations where NAGPRA cultural items or NHPA historic properties may be encountered during intentional excavation of archeological resources, the

requirements of NAGPRA and 43 CFR § 10, and NHPA and 36 CFR§ 800 must be met prior to such archeological excavations.

The Garrison Commander will ensure that Military Police, installation legal staff, the installation Public Affairs Office, and the Fish, Game, and Recreation Management staff are familiar with the requirements and applicable civil and criminal penalties under ARPA. Also, in accordance with ARPA Section 9, the Garrison Commander may withhold information concerning the nature and location of archeological resources from the public under subchapter II of Chapter 5 of Title 5 of the United States Code or under any other provision of law.

Native American Graves Protection and Repatriation Act (NAGPRA)

The purpose of the NAGPRA of 1990 [25 USC § 3001-13] is to set forth the rights of Native American tribal groups and Native Hawaiian organizations with respect to ownership of human remains, funerary objects, sacred objects, and objects of cultural patrimony with which they can demonstrate lineal descent or cultural affiliation. The act protects Native American burial sites and controls the removal of human remains, funerary objects, sacred objects, and objects of cultural patrimony on federal, Native American, or Native Hawaiian lands during planned or unanticipated excavations. NAGPRA requires that federal agencies and museums receiving federal funds inventory holdings for such remains and objects, and work with the tribal groups in a consultation process to reach agreements on the repatriation or other disposition of the remains and objects.

The stricter requirements of NAGPRA should be implemented in addition to the Section 106 requirements when an undertaking has the possibility of impacting historic properties important to Alaska Native communities; however, both are overlapping at times and need coordinating efforts. NAGPRA gives individuals and certain groups considerable decision-making authority in the excavation, removal, and repatriation of Native American cultural items and burials. Excavation of Native American cultural items and consultation with the appropriate federally-recognized Native American tribal groups should be undertaken as appropriate to the NAGPRA legislation. Guidelines for procedures to follow after unexpected discovery of Native American human remains are set forth in implementing regulations of 43 CFR § 10.4-6.

Through NAGPRA, federal land managers have the responsibility to identify ethnic/cultural affiliation of human remains and proper ownership of associated funerary items, sacred objects, or objects of cultural patrimony and to ensure the rightful disposition of these items (defined in Section 2 of NAGPRA) that are in federal possession or control. NAGPRA requires that certain procedures be followed when there is an intentional excavation of or an inadvertent discovery of human remains, funerary items, sacred objects or other objects of cultural patrimony. The Garrison Commander will ensure compliance with NAGPRA (23 USC 3002) and its implementing regulation (43 CFR § 10).

USAG FWA may enter into Comprehensive Agreements with federally-recognized tribes for the purposes of compliance with NAGPRA and 43 CFR § 10. Comprehensive Agreements should establish responsibilities and address all USAG FWA land management activities that could result in the intentional excavation or inadvertent discovery of human remains, funerary objects, sacred objects, and objects of cultural patrimony, establish standard consultation procedures, and provide for the determination of custody, treatment, and disposition of human remains and the items listed above. USAG FWA has begun discussions with the Upper Tanana tribes concerning NAGPRA procedures.

Absent a Comprehensive Agreement, USAG FWA will take reasonable steps to determine whether a planned activity could result in the intentional excavation or inadvertent discovery of human remains,

funerary/sacred objects or items of cultural patrimony from federally-owned or controlled USAG FWA-managed lands. When it is determined that human remains or such items may be encountered and, prior to issuing approval to proceed with the activity, the Garrison Commander will carry out the consultation procedures and planning requirements at 43 CFR § 10.3 and 10.5. Following consultation per 43 CFR § 10.5 as part of the intentional excavation or inadvertent discovery of human remains or items listed above, a written Plan of Action must be prepared in accordance with the 43 CFR § 10.5(e). Such procedures and actions should be coordinated with the requirements of the NHPA and ARPA when such excavations or discoveries may involve historic properties and/or archeological resources.

If an inadvertent discovery of human remains, funerary or sacred objects or other items of cultural patrimony occurs in connection with an ongoing activity on the installation and there is no Comprehensive Agreement in effect that sets forth agreed upon procedures for such instances, then the USAG FWA must comply with 43 CFR § 10.4 (a-d). Such compliance measures include but are not limited to notifications, cessation of the activity for 30 days in the area of the discovery, protection of the discovery, consultation with tribes affiliated with the discovery in accordance with 43 CFR § 10.5 and preparation of a written Plan of Action. USAG FWA must ensure that all authorizations to carry out activities on federally-owned or controlled installation lands, including leases and permits, include a requirement for the holder of the authorization to notify the commander immediately upon the inadvertent discovery of cultural items and to protect such discoveries until applicable compliance procedures are satisfied.

USAG FWA must ensure that intentional excavation and response to any inadvertent discovery of NAGPRA human remains, funerary objects, sacred objects, and objects of cultural patrimony are carried out in compliance with all applicable statutory and regulatory requirements of NAGPRA, ARPA and NHPA. Each statute mandates compliance with independent requirements. Compliance with one statutory requirement, therefore, may not satisfy other applicable requirements.

Inventory and repatriation of human remains, funerary objects, sacred objects, and objects of cultural patrimony that are in existing collections under Army possession or control will occur in accordance with NAGPRA Sections 5, 6, and 7 and 43 CFR § 10. In instances where there is a dispute as to the ownership of human remains, funerary objects, sacred objects, and objects of cultural patrimony, the installation will safeguard the cultural items until the dispute is resolved in accordance with NAGPRA Section 7(e). The Garrison Commander will notify the IMCOM and HQDA (AEC) in the event of a dispute as to ownership of cultural items. All activities carried out to comply with NAGPRA and 43 CFR § 10 will only occur with federally-recognized tribes and lineal descendants as defined and provided for by NAGPRA.

American Indian Religious Freedom Act (AIRFA)

The American Indian Religious Freedom Act of 1978 [42 USC § 1996] states that it is the policy of the United States to "protect and preserve for American Indians their inherent right of freedom to exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." The provisions of AIRFA guarantee access to traditional sites on federal lands and noninterference with religious practices. Consultation under AIRFA with Native American groups can simultaneously satisfy the requirements of NEPA as well.

1.7.2 Curation of Federally Owned and Administered Archeological Collections

USAG FWA ensures that all "collections," as defined in 36 CFR § 79.4 (a), are processed, maintained and curated in accordance with the requirements of 36 CFR § 79. However, if in the future, USAG FWA

possesses NAGPRA cultural items and human remains, control of the items will be disposed of in a manner consistent with the requirements of NAGPRA and 43 CFR § 10.

USAG FWA archeological collections may be processed, maintained and curated on and by the installation, by another federal agency, state agency, or other outside institution or non-governmental organization, in cooperative repositories maintained by or on behalf of multiple agencies, or in other facilities, under contract, Cooperative Agreement, or other formal funding and administrative arrangement provided the standards of 36 CFR § 79 are met.

USAG FWA will establish procedures in the installation ICRMP to minimize the amount of archeological "material remains" (as defined in 36 CFR § 79.4(a) (1)) that are collected during archeological inventory and site excavation and permanently curated. Such procedures will be integrated into any contracts or Comprehensive Agreements for such activities and will serve to reduce the long-term costs associated with archeological materials curation requirements. Such procedures will recognize that not all archeological material remains recovered from fieldwork need be accessioned into the installation collection and permanently curated. Archeological material remains recovered during field inventory and site identification efforts should be analyzed and recorded but generally should not be accessioned into the permanent installation archeological collection. For artifacts recovered from more extensive excavations, such as site evaluation for National Register eligibility, or from data recovery excavations (mitigation), some classes of material remains may be analyzed and recorded but not permanently accessioned into the installation collection. Permanent curation should be reserved for diagnostic artifacts and other significant and environmentally sensitive material that will add important information to site interpretation. The preservation and maintenance guidelines for collections of prehistoric and historic material remains and records recovered from federal or federally assisted programs that are in the care of the federal government are set forth in *Curation of Federally Owned and Administered Archeological Collections* [36 CFR § 79]. NPS has established definitions, standards, procedures, and guidelines to be followed by federal agencies in preserving prehistoric and historic remains.

Approximately 41 cubic feet of prehistoric and historic artifacts and associated documentation related to archeological sites located at Fort Wainwright and associated training lands are currently housed at the University of Alaska Museum of the North. The artifacts are chiefly prehistoric stone tool materials. The maintenance and care of these collections meet the requirements established in 36 CFR § 79. 36 CFR § 79 applies to collections recovered under the NHPA, ARPA, Antiquities Act, and Reservoir Salvage Act (as expanded/amended by the Archeological Recovery Act and the Archaeological and Historic Preservation Act).

1.7.3 Executive Orders, Presidential Memoranda, and DoD Issuances

Executive Order (EO) **11593: Protection and Enhancement of the Cultural Environment**

EO 11593 (13 May 1971) establishes a national policy to preserve and maintain the historic and cultural environment of the United States. The EO directs federal agencies to administer historic properties under their control so as to preserve the resources for future generations. This EO was codified and incorporated into the 1980 amendments to the NHPA as Section 110 and was further revised during the 1992 amendment to the NHPA.

Executive Order 13007: Indian Sacred Sites

EO 13007 (24 May 1996) establishes that federal agencies are responsible for allowing Native American religious practitioners access to and ceremonial usage of sacred Native American sites on federal land.

The agency will keep the locations of such sites confidential and will avoid adversely affecting the integrity of these sites.

USAG FWA will consult with tribes to identify sacred sites that are necessary to the exercise of traditional religions and will provide access to USAG FWA-managed lands for tribal practice of traditional religions, rights and ceremonies. USAG FWA may impose reasonable terms, conditions and restrictions upon access to such sites when the Garrison Commander deems it necessary for the protection of personal health and safety or to avoid interference with the military mission, or for other reasons of national security. USAG FWA will maintain the confidentiality of sacred site locations.

USAG FWA will avoid adversely affecting the physical integrity of sacred sites and will establish procedures to ensure reasonable notice is provided to federally-recognized tribes when proposed actions or land management policies and practices may restrict future access to, ceremonial use of, or adversely affect the physical integrity of sacred sites. If necessary, such procedures should be set forth in this ICRMP. If a sacred site may be affected by USAG FWA land management policies or practices, the Garrison Commander will also ensure that the compliance requirements of the NHPA are met if the sacred site meets the NHPA definition of a historic property.

Executive Order 13175: *Consultation and Coordination with Indian Tribal Governments* (6 November 2000)

EO 13175 requires federal agencies to support the policy of tribal self-determination by implementing an effective process to ensure meaningful and timely consultation with tribes during the development of policies with potential tribal impacts. The mandates of EO 13175 apply whenever federal agency actions have substantial direct effects on a tribe or on the relationship between the federal government and a tribe, or on the distribution of power and responsibilities between the U.S. and tribal governments. EO 13175 reiterates the policy of government-to-government interactions with tribes and applies specifically to federally recognized tribal governments. The USAG FWA Native Liaison is mandated to implement EO 13175 through:

. Identifying USAG FWA staff and programs that develop and implement programs, projects and activities with potential to affect tribal governments, lands, resources, and interests;

. Promoting substantive communication whenever possible between USAG FWA and tribal governments through regular meetings and correspondence regarding department activities and plans, appropriate to each sovereign tribal government;

. Engaging in active efforts to improve and enhance government-to-government relations with tribal governments through outreach, regular and open dialogue and partnering agreements (as authorized), in cooperation with designated tribal representatives; and

. Educating agency staff about the legal status/rights of and issues of concern to tribal governments and the methods for establishing effective communication and consultation with tribal groups.

Presidential Memorandum: *Distribution of Eagle Feathers for Native American Religious Purposes*

The Presidential Memorandum of 29 April 1994 stipulates that salvageable eagle carcasses and eagle feathers located on federal lands may be collected for those Native American entities that are engaged in religious activities and are federally-recognized tribes eligible to receive services from the Bureau of Indian Affairs listed under 25 USC. § 479a-1. Collected salvageable carcasses and feathers for Native American religious purposes should be shipped to the U.S. Fish and Wildlife Service Forensic Laboratory.

Regulation 50 CFR § 22.22 allows permits to be issued for the possession, taking, and transportation of lawfully acquired golden eagles or bald eagles or their parts, nests, or eggs for religious use by federally-recognized Native American tribal entities. The Secretary of the Interior may grant or deny the permit based on several criteria, among which are the effects that taking live eagles would have on the wild populations of the birds and whether the applicant is authorized to participate in bona fide tribal religious ceremonies.

Presidential Memorandum: ***Government-to-Government Relations with Native American Tribal Governments***

U.S. policy concerning relationships with Native American tribes is established under the Presidential Memorandum dated 29 April 1994. This policy states that consultation with Native American tribes must be conducted as government-to-government interactions.

This memorandum requires that consultation between the Army and federally-recognized Indian tribes occur on a government-to-government basis and in an open and candid manner.

Consultation with federally-recognized Indian tribes on a government-to-government basis occurs formally and directly between Garrison Commanders and heads of federally-recognized tribal governments. Garrison Commanders establish government-to-government relations with federally-recognized Indian tribes by means of formal, written letters to the heads of tribal governments. Such letters should designate an installation Native Liaison who is authorized to conduct follow-on consultations with designated representatives of the tribal government. Any final decisions on installation plans, projects, programs or activities that have been subject of government-to-government consultation will be formally transmitted from the Garrison Commander to the head of the tribal government.

This presidential memorandum also requires that installations assess the impact of their plans, projects, programs, and activities on tribal trust resources and assure that tribal government rights and concerns are considered during the development of such plans, projects, programs, and activities.

Presidential Memorandum: ***Tribal Consultation*** **(5 November 2009)**

President Obama signed a presidential memorandum on tribal consultation to acknowledge the unique legal and political relationship between the tribes and federal agencies. Its signing was in response to concerns that federal agencies had frequently failed in their mission to include the voices of tribal officials in the creation of policy. It prescribed the reporting of federal, agencies to the President's Office of Management and Budget on the results of consultation in consistency with EO 13175, 90 days after the memorandum's signing and annually thereafter.

Department of Defense American Indian and Alaska Native Policy **(20 October 1998)**

The Department of Defense American Indian and Alaska Native Policy provides guidelines for government-to-government relations between military agencies and tribal governments based on the trust relationship, federal policy, treaties, and federal statutes and in support of tribal self-governance. It specifies that DoD personnel must consider the "unique qualities of individual tribes when applying these principles, particularly at the installation level" (Policy preamble). The policy recognizes and emphasizes the importance of increasing understanding and addressing tribal governments' concerns prior to reaching decisions on "matters that may have the potential to significantly affect protected tribal resources, tribal

rights, or Indian lands" (Ibid.). For USAG FWA, these resources include those found in plant harvesting, hunting and fishing areas on Army-managed lands, including wildlife that migrates through Army lands.

***Department of Defense American Indian and Alaska Native Policy: Alaska Implementation Guidance* (11 May 2001)**

This document outlines specific guidelines for implementing the DoD American Indian and Alaska Native Policy for Alaska agencies.

DoD Instruction 4710.02: *Department of Defense Interactions with Federally Recognized Tribes* (DoDI 4710.02) (14 September 2006)

DoDI 4710.02 implements the Department of Defense American Indian and Alaska Native Policy, assigns responsibilities and provides procedures for DoD interactions with federally recognized tribes. DoDI 4710.02 defines consultation triggers (laws, regulations, and executive orders) and provides consultation guidelines. It requires base commanders at installations that have on-going consultation and coordination with tribes through an assigned staff member, serving as a tribal liaison. DoDI 4710.02 requires tribal consultation on ICRMPs and INRMPs that may affect tribal rights, land or resources and provides measures of merit for NAGPRA.

DoD Instruction 4715.16: *Cultural Resources Management*

As specified in DoD Instruction 4715.16, the policy of the department is to integrate archaeological and historic preservation requirements of applicable laws with the planning and management of DoD activities. It assigns specific responsibilities to department heads, lists management procedures mirroring federal laws and regulations concerning cultural resources, and reinforces the responsibility of the DoD to comply with these laws. The directive applies to all branches and departments of the DoD, including National Guard and Reserve components.

1.7.4 Army Regulations and Policy

Army Regulation 200-1: *Environmental Protection and Enhancement*

AR 200-1 provides the policy for environmental protection and enhancement and for compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and other environmental acts. AR 200-1 states that the Army's goal is to manage cultural resources on Army-manage property in a way that minimizes effects to the mission, complies with federal law, and follows sound principles of cultural resource management. It establishes program requirements including: the development of an ICRMP, NHPA agreement documents, as necessary, the appointment of a Cultural Resources Manager, the establishment of government-to-government relationships with federally-recognized Indian tribes, and the establishment of a program for early coordination between the installation's Cultural Resources Manager and project proponents. Environmental audits and status reports are required, and entities responsible for site selection for military construction activities are to conduct environmental surveys prior to site selection.

Additionally, AR 200-1 provides the policy for complying with the NHPA, AIRFA, Executive Orders 13007 and 13175, NAGPRA, ARPA, and AHPA. It states that the Garrison Commander will be the agency official with responsibility for cultural resources actions, that installations will develop a program to identify historic properties, sites of traditional cultural importance, and procedures for curating archaeological resources.

Army Regulation 870-20: *Historical Properties and Museums*

AR 870-20 standardizes the guidelines and procedures for maintaining an Army museum. Used in conjunction with 36 CFR § 79 (*Curation of Federally Owned and Administered Archeological Collections*), this regulation includes procedures for the care and maintenance of significant property, for certification as a professional museum; for the establishment of exhibits; and for the acquisition, cataloguing, and de-accessioning of historical objects.

***Army American Indian and Alaskan Native Policy* (24 October 2012)**
The Army American Indian and Alaskan Native Policy dovetails with the Department of Defense American Indian and Alaska Native Policy. Singed by the Secretary of the Army on 24 October 2012, it recognizes the U.S. Army's responsibilities to federally recognized tribes and institutionalizes principles for Army interaction with these tribes.

1.7.5 Standards and Guidelines

Several key coordinating guidelines have been issued by the Secretary of the Interior and ACHP that prescribe standards recommended to manage historic preservation programs. Significant discussions are found in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and in "Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines" issued in the Federal Register of September 29, 1983 [48 FR 44716-44740]. The guidelines discuss preservation planning, identification, evaluation, registration, documentation, and professional qualifications. It should be noted that the above mentioned guidelines are neither law nor regulation and are only intended to serve as general guidance.

1.7.6 Overlapping Authorities

Because different laws and regulations may apply to a specific issue, compliance with one set of laws and regulations does not necessarily constitute full compliance with all laws pertaining to that issue. For instance, AIRFA and EO 13007 address different aspects of Native American religious practices; Section 110 of NHPA, EO 11593, and ARPA all require inventory of all cultural resources on land under the control of federal agencies or the federal government; and NHPA and NEPA may both come into play when planned or proposed federal actions or undertakings result in the potential to affect cultural resources.

The relationship between NHPA and NEPA may be of significance. The extent to which proposed actions will impact cultural resources is crucial in determining whether the undertaking has "no adverse effect" under NHPA or whether it has "no significant effect" under NEPA. NEPA applies to federal actions that have the potential for significant environmental impacts; NHPA can apply to any federal action that has the capability of affecting National Register-eligible historic properties. For example, an action to replace an original wooden door with an aluminum door on a historic property would not be considered a significant impact under NEPA. Under NHPA, however, the replacement of an original door could affect the integrity and eligibility of the building and thus be an "adverse effect."

Under revised regulations implementing Section 106 of NHPA [36 CFR § 800], the NEPA compliance process can be used for Section 106 compliance purposes if the procedures outlined in Section 8 of 36 CFR § 800 are followed. According to the regulation, "An agency official may use the process and documentation required for the preparation of an EA/ FONSI or an EIS/Record of Decision to comply with Section 106 in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6 if the agency official

has notified in advance the SHPO/THPO, any Native American tribe on whose tribal land the undertaking occurs or affects historic properties, and ACHP that it intends to do so, and the standards of 36 CFR § 800.8(c)(I) are met."

The issue of archaeological fieldwork may also fall under the overlapping authorities of ARPA and NHPA. Work conducted on a National Register eligible or listed property under an ARPA permit would have to employ the appropriate NHPA consultation procedures [36 CFR § 800] on potential impacts to those properties. The same situation of overlap may occur with NAGPRA and NHPA; NAGPRA requirements may apply if Native American human remains and associated funerary objects are uncovered in an archaeological excavation being conducted under a Section 106 action.

Consultation requirements fall under several areas of legislation and may, in some cases, overlap. NHPA, ARPA, NEPA, and EO 13007 (*Indian Sacred Sites*) contain consultation requirements. Section 106 of NHPA coordination requires that a federal agency, when potentially impacting or having an impact on National Register eligible or listed historic properties, must consult with other federal, state, and local agencies, as well as federally-recognized Native American tribal groups. Under ARPA permit-granting regulations, consultation is also required in many situations.

NEPA requirements dictate that EAs and EISs be made available to the public for comment on potential impacts to environmental and cultural resources. EO 13007 (*Indian Sacred Sites*), which allows Native American tribes the religious use of and access to sacred sites, directs agencies to implement or propose procedures to facilitate consultation with appropriate Native American tribes and religious leaders to expeditiously resolve disputes relating to agency action on federal lands that may adversely affect access to, the ceremonial use of, or the physical integrity of sacred sites.

2 HISTORICAL AND GEOGRAPHIC SETTING

USAG FWA manages Fort Wainwright. The installation is located north of the Alaska Range in Interior Alaska and consists of a cantonment and three training areas: the Tanana Flats Training Area (TFTA), the Yukon Training Area (YTA), and the Donnelly Training Area (DTA)[1] totaling approximately 1,559,000 acres. The cantonment, TFTA, and YTA are located in the Fairbanks North Star Borough, and DTA is located near the town of Delta Junction, 100 miles southeast of Fairbanks. A discussion of the natural environment of the installation can be found in the USAG FWA Integrated Natural Resources Management Plan.

2.1 Infrastructure

The Fort Wainwright Main Post area consists of the cantonment and the Main Post training areas. Immediately to the south of the Main Post area is the Small Arms Range Complex. TFTA, located directly south of the Main Post, contains dudded impact areas and light maneuver training areas. YTA, located approximately 20 miles southeast of the Main Post, has seven maneuver training areas, numerous artillery and mortar firing points, two drop zones and a dudded impact area. DTA, located approximately 90 miles southeast of the Main Post, is composed of a range complex with small arms ranges, dudded impact area, weapons testing ranges, maneuver ranges, drop zones and other types of training ranges. Black Rapids and Whistler Creek Rock Training Areas are training areas home to the Northern Warfare Center and are historically associated with DTA. Gerstle River Training Area is used for maneuver training and non-dudded small arms firing.

2.1.1 Training Areas

Currently, Fort Wainwright encompasses approximately 1,559,000 acres. Fort Wainwright Main Post has 12 major training areas, TFTA has 8 training areas, YTA has 8 training areas, and DTA contains over 60 training areas.

2.1.2 Ranges

The Air Force has a bombing/gunnery range west of Blair Lakes that is off-limits to non-military activities. In winter, this unit has several areas used as Drop Zones: Clear Creek, Larry and the lakes themselves. An airstrip for C-130s is located in the southern portion, as well as an airstrip adjacent to Blair Lakes. The airstrips at Blair Lakes and Clear Creek are used by recreational aircraft and are in poor condition. Clear Creek Assault Strip is large enough to support airborne and battalion-sized operations. Alpha Impact Area, located in the northern portion contains an impact area for indirect fire weapons and small arms firing from north of the Tanana River. Surveyed firing points are located near Range Control. There are also three surveyed artillery firing points in the Tanana Flats Training Area for use with the Alpha Impact Area.

YTA has one demolition range, which is similar to an impact area. Twenty-six mortar and artillery firing points utilize Stuart Creek Impact Area on YTA. A new Digital Multi-Purpose Training Range and Infantry Platoon Battle Course are also located on YTA, as well as the Husky Drop Zone, which supports strategic airborne operations.

[1] The Donnelly Training Area formerly was part of Fort Greely but has been realigned to Fort Wainwright.

DTA includes approximately 501,022 acres of maneuver land and 147,463 acres of impact areas. DTA has 13 existing firing ranges, which are briefly described below. Construction was completed for the Battle Area Complex and Combined Arms Collective Training Facility in 2009.

Alabama Range is used to zero privately owned weapons. It includes eight firing tables with benches and target frames at 25, 50, 100, 150, 200, 250, and 300 meters.

Arkansas Range is a qualification range for small arms, including M16, 9 mm, and .45 caliber at 25 meters, and 7.62 mm (M60 / M240 / Mk. 48 Mod. 0) munitions at 10 meters.

Collective Training Range includes two Infantry Platoon Battle Courses and one Multi-Purpose Training Range and is capable of supporting platoon and company live-fire exercises and crew qualifications.

Colorado Range is designed for testing and qualifying with small arms and direct fire weapons requiring 50 meters or more. Targets are set at known distances, with 10 firing berms spaced 100 yards apart.

Georgia Range is designed for multi-purpose testing/training and qualification with small arms, direct fire weapons, and aerial gunnery. This range is equipped with two Forward Area Arming and Refueling Points and four helicopter pads.

Lampkin Range is utilized for multi-purpose testing/training and firing of small arms, direct fire weapons, and limited engineer demolitions.

Mississippi Range, a former combination mortar range and helicopter rearm point, is used by the Cold Regions Test Center for testing.

Oklahoma/Delta Creek Range is primarily used by the Air Force for bombing and gunnery.

Texas Range is a firing test range, capable of supporting large caliber direct and indirect fire weapons, and defensive missile systems. In recent years it has primarily been used by the Cold Regions Test Center.

Washington Range can accommodate the Area Weapons Scoring System for evaluating air to surface firing, surface-to-air fire for any air defense battery with target drone equipment, and surface-to-surface direct and indirect fire weapons systems.

Bondsteel Combined Arms Live Fire Exercise is a building site combined arms live-fire range.

Combined Arms Live Fire Exercise Bowl is a small arms defensive or tactical live-fire area. It lies between Observation Point 7 and Observation Point 8 and is used for combined arms live-fire exercises.

Simpsonville Maneuver Range is a building site combined arms live-fire range.

Other significant training facilities include ten drop zones and two combat assault strips that support airborne and air-land operations. Donnelly Drop Zone can support a battalion-sized airborne operation. Eight of these drop zones are located in the Donnelly East Training Area and two are located in the Donnelly West Training Area. All are used primarily as non-firing maneuver areas. The Cold Regions Test Center utilizes DTA for experimental airdrops, airborne training, and testing of clothing, vehicles, and equipment. In 1991, a $6.2 million test facility was completed at Bolio Lake to conduct natural environment cold weather testing of military equipment by the Cold Regions Test Center. In 2004, the

Cold Regions Test Center constructed an automotive test complex, including a 3-mile test track, just south of the Fort Greely boundary.

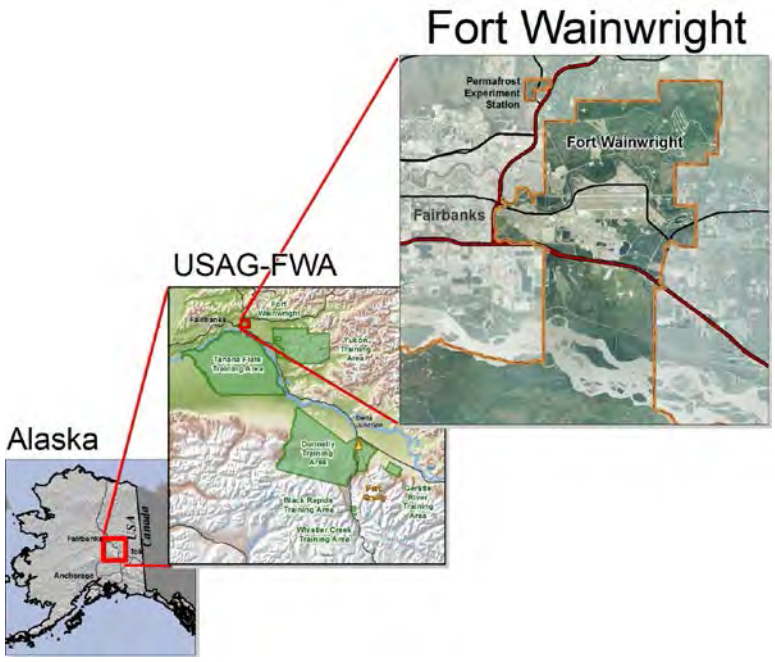


Figure 1. Fort Wainwright showing boundary, training areas, impact area, and surface danger zones.

2.2 Prehistoric Context

Interior Alaska has been continuously inhabited for the last 14,000 years, and evidence of this continuum of human activity is preserved within and around Fort Wainwright's training lands. Interior Alaska's ice-free status during the last glacial period provided a corridor connecting the Bering Land Bridge and eastern Asia to North America. This allowed small bands of nomadic peoples to colonize Alaska and the rest of the continent and began a period of habitation in Interior Alaska that has persisted through the entire Holocene, the arrival of European traders in the late 1810s, the Klondike Gold Rush of the late 19th and early 20th centuries, and the military development of the Interior during the middle of the 20th century. Fort Wainwright's cantonment and training lands comprise a vast and still relatively un-surveyed region with areas of high potential for yielding evidence of this activity.

Alaska has long been regarded as the gateway to the Americas and has held archaeological interest as the possible location for the oldest archaeological sites in the New World. This is due to more than Alaska's proximity to Asia and ice-free condition at the end of the Pleistocene. Similarities between archaeological assemblages in Siberia and Alaska and the discovery of lanceolate projectile points in the muck deposits around Fairbanks in the early 1900s (which bore a resemblance to Clovis points of some antiquity in the American southwest) also sparked interest in Alaska as a source area for all Native Americans.

After initial colonization, archaeologists generally divide Interior Alaska's prehistory into three broad archaeological themes: the Paleoarctic Tradition (12,000-6,000[2] years ago), the Northern Archaic

[2] All dates are given in calendar years "before present."

Tradition (6,000-1,000 years ago), and the Athabaskan Tradition (1,300-800 years ago).[3] Archeological materials from these cultures are generally limited to lithic artifacts such as projectile points, cutting tools, scrapers, waste flakes from tool manufacturing, faunal remains, and hearths.

Reconstructions of paleoecological evidence suggest that the end of the Pleistocene was marked by a warming trend in Interior Alaska that may have contributed to initial colonization of the area.[4] Several sites in areas surrounding Army lands demonstrate that people began living in Interior Alaska 14,000 years ago. Significant sites in the Tanana Valley, dating between 14,000-12,000 years ago, include Healy Lake,[5] Walker Road,[6] Swan Point,[7] Mead[8], and Broken Mammoth.[9] There are no sites in Alaska, however, that predate the oldest sites in the contiguous United States, nor do Alaska's oldest sites resemble the Clovis culture.[10] The Younger Dryas cooling event from 13,000-12,000 years ago[11] may have led to a temporary population decline[12] in the Interior before permanent colonization.

The "Paleoarctic Tradition" is a term is now generally used by archaeologists to refer to the earliest settled people known from all over Alaska. It was originally defined by Anderson[13] as the earliest microblade-using tradition in the American Arctic, with a proposed relationship to northeast Asian late Pleistocene cultures based on similarities in these distinctive artifact types. Archaeological evidence indicates that early settlers camped on terraces, lakeshores, buttes, and bluffs. By using these locations on high ground, they could locate and track prey that included large mammals such as mammoth and bison. Evidence from the Upward Sun River Site, located just 5 km southeast of TFTA, for example, demonstrates that hunter-gatherers in Interior Alaska were concentrating on bison and wapiti at the end of the Pleistocene.[14] It is likely that the treeless environment and nomadic nature of these peoples had a direct impact on the kinds of tools they fashioned. Stone, bone, antler, and ivory provided the most abundant material for manufacturing weapons and cutting tools. Artifacts typically associated with this culture include small stone microblades, microblade cores, bifacial projectile points, and unifacial scraping tools.

In Interior Alaska, this tradition historically included two cultural divisions called the Nenana and Denali complexes. The Nenana Complex was identified by Powers and Hoffecker[15] from sites in the Nenana Valley. This complex began approximately 11,000 years ago with an artifact assemblage that included triangular or teardrop-shaped, bifacially worked projectile points ("Chindadn" points[16]); large unifacial chopper-like tools; and flake tools. The Nenana Complex is defined as lacking microblades, microblade cores and burins, and was proposed to predate the microblade-rich Denali Complex. Many Nenana Complex archaeological sites are located in the Tanana Valley, adjacent to USAG FWA's training lands (Broken Mammoth,[17] Chugwater,[18] Donnelly Ridge,[19] Healy Lake,[20] Mead,[21] and Swan Point[22]).

[3] Potter 2008
[4] Bigelow and Powers 2001
[5] Cook 1996
[6] Goebel et al. 1996
[7] Holmes et al.1996; Holmes 2001
[8] Holmes 2001
[9] Holmes 1996; Yesner 2001
[10] Bever 2006
[11] Bigelow and Powers 2001
[12] Potter 2008
[13] Anderson called it the "American Palaeoarctic Tradition" but most researchers use the shortened version. Anderson 1968, 1970
[14] The Upward Sun River Site is also known for one of the earliest burials in the Americas. Potter 2008; Potter et al. 2008; Potter et al. 2011
[15] Powers and Hoffecker 1989)
[16] Cook 1969, 1975; Holmes and Cook 1999
[17] Holmes 1996; Yesner et al. 1999
[18] Lively 1996
[19] West 1967, 1996, Donnelly Ridge is located in DTA
[20] Cook 1989
[21] Holmes 2007

The Denali Complex, dated roughly to 10,500 to 8,000 years ago, was originally defined by West[23] and includes distinctive wedge-shaped microblade cores, core tablets and their derivative microblades, large blades, biconvex bifacial knives, certain end-scraper forms, and burins. West[24] later defined the Denali Complex as a regional variant of the American Paleoarctic Tradition. Denali sites in the vicinity of USAG FWA's training lands include Mt. Hayes,[25] Swan Point,[26] and Gerstle River.[27] At least one site in TFTA (XMH-2043) has also been dated to this period.

The relationship between the proposed Nenana and Denali complexes is as of yet unresolved. As discussed above, some researchers view the Nenana Complex as a bifacial industry that predates the microblade-based Denali Complex. However, current research at sites such as Swan Point and Broken Mammoth indicates that microblades and burins were used by the earliest known cultures in Interior Alaska, with a later co-occurrence with Chindadn points—the defining artifact type of the Nenana Complex. Although some archaeologists still believe that there is a cultural distinction between the Nenana and Denali complexes,[28] the general understanding from Interior Alaskan archaeologists is that there is a behavioral explanation for the presence or absence of microblades in different assemblages.[29] Moreover, both Nenana and Denali technology persist in central Alaska throughout the Holocene.[30]

Site density declined in the areas around Fort Wainwright in the early Holocene, suggesting a slight depopulation during a period of climate change, which initiated the widespread establishment of spruce forests.[31] The boreal forest in Interior Alaska was established 8,000 years ago.[32] Sites from this time period are less well publicized than the older sites but include Houdini Creek (circa 8,600 years old),[33] Hurricane Bluff (c. 9,800 years old),[34] Lucky Strike (c. 8,500 years old),[35] Gerstle River (c. 10,000 years old),[36] and the Campus Site (c. 7,700 years old).[37] Bison, wapiti, and birds were the most important subsistence game during this period.[38]

Site density increased again after about 6,000 years ago in Interior Alaska.[39] This population increase coincides roughly with the Northern Archaic Tradition and the appearance of side-notched projectile points. Anderson[40] originally defined the Northern Archaic Tradition to specifically address notched point bearing stratigraphic horizons that did not contain microblades at the Onion Portage site in northern Alaska. Alaskan notched points were generally similar to Archaic-age dart points in the contiguous United States. Time has shown middle Holocene assemblages in Alaska to be quite diverse, however, and it is questionable whether this trait is related to southern forms or if it is a reliable indicator of cultural affiliation.[41] Artifact assemblages associated with this culture can vary but generally contain myriad tools

[22] Holmes et al. 1996; Holmes 1998, 2007
[23] West 1967; 1975
[24] West 1981
[25] West 1996
[26] Holmes et al. 1996; Holmes 1998, 2007
[27] Potter 2001
[28] e.g. Dumond 2001
[29] Holmes 2001; Potter 2008; Yesner and Pearson 2002
[30] Bever 2006
[31] Potter 2008
[32] Bigelow and Powers 2001
[33] Potter et al. 2007
[34] Potter et al. 2007
[35] Potter et al. 2007
[36] Potter 2008
[37] Pearson and Powers 2001
[38] Potter 2007; Potter 2008
[39] Potter 2008
[40] Anderson 1968
[41] Clark 1992; Cook and and Gillespie 1986

ranging from bifacial knives and microblades to end scrapers and side-notched points. Middle Holocene hunter-gatherers had a subsistence economy focused on seasonally abundant game including caribou, fish, and moose.[42] Notched point assemblages occur in many sites in Interior Alaska, including over one dozen on Army lands.[43] Several sites,[44] including the excavated Banjo Lake site in DTA (XMH-874), have also produced middle Holocene dates from hearth charcoal. The 6,300-6,700-year-old dates from Banjo Lake were also associated with a microblade component.[45]

Utilization of microblade and burin-based industries appears to continue through the middle and late Holocene in Interior Alaska.[46] By the late Holocene, archaeologists see a shift from seasonal large mammal hunting with a nomadic lifestyle to a focus on seasonally overabundant resources, use of storage, and more permanent settlements.[47] Artifact assemblages do not drastically change until the last millennium of the Holocene when microblades disappear from the archaeological record.[48]

Linguistic evidence suggests that the Athabaskan culture may have appeared in the Tanana Valley as early as 2,500 years ago. Through ethnography, oral history, and a broad array of cultural items, much has been learned about Athabaskan culture and history in the region. Artifacts associated the Athabaskan culture are exceptionally diverse and include bone and antler projectile points, fishhooks, beads, buttons, birch bark trays, and bone gaming pieces. In the Upper Tanana region, copper was available and used in addition to the traditional material types to manufacture tools such as knives, projectile points, awls, ornaments, and axes.[49] A late prehistoric Athabaskan occupation is recognized at several sites in and around USAG FWs training lands.[50] Of particular interest in this regard is a copper projectile point recently found in a buried context at DTA (XBD-272).[51]

The Athabaskan Tradition includes late prehistoric and proto-historic cultures generally believed to be the ancestors of Athabascan tribes who currently inhabit Interior Alaska. Excavated Athabaskan sites are rare, but the limited body of evidence allows for several generalizations. Raw material usage was reorganized in the Athabaskan Tradition, which de-emphasized stone tool making and increased the emphasis on the manufacture of items from native copper and organic materials.[52] Assemblages include ground and pecked stone artifacts and an increased use of expedient tools. There was a broadening and diversifying of the resource base at this time to include small mammal and freshwater marine animals such as fish and mollusks.[53] Athabaskan sites tend to occur in resource-rich areas near lakes, streams and rivers, and are generally characterized by large house pit and cache pit features. Proto-historic Athabaskan assemblages include Euro-American trade goods such as glass beads and iron implements. Sites of this time period reflect an increased reliance on outside trade and include log cabins co-occurring with traditional house pits, as well as a change in site location to maximize trading opportunities.[54]

Athabascan settlement patterns depended greatly on the availability of subsistence resources, and Interior bands lived a nomadic lifestyle. They often traversed vast areas to support themselves and spent

[42] Potter 2008
[43] XBD-277, XMH-277, XMH-283, XMH-303, XMH-309, XMH-874, XMH-950, XMH-1130, XMH-1168, XMH-1300 Robertson et al. 2004; Raymond-Yakoubian and Robertson 2005
[44] XBD-270, XMH-915, XMH-925
[45] Robertson et al. 2008
[46] Esdale 2008; Potter 2004
[47] Potter 2008b
[48] Potter 2008
[49] Clark 1981
[50] Andrews 1975; Andrews 1987; Cook 1989; Mishler 1986; Sheppard et al. 1991; Shinkwin 1979; Yarborough 1978
[51] Robertson et al. 2009
[52] Dixon 1985
[53] McFadyen Clark 1981; McFadyen Clark 1996; Ream 1986; Sheppard et al. 1991; Shinkwin 1979
[54] Andrews 1975; Andrews 1977; Andrews 1987; McFadyen Clark 1981; VanStone and Goddard 1981

considerable time engaged in subsistence activities. It was often necessary for bands to divide into smaller groups to find game, and preserved fish were used as a staple of the diet in addition to fresh game.[55] Four Athabascan linguistic and geographic groups have inhabited the Tanana Valley: the Upper Tanana, Tanacross, Tanana and Koyukon. Each group is further distinguished according to geographic location. Bands of the Tanana and Tanacross groups are historically associated with the geographic area that encompasses Fort Wainwright and Fort Greely. Salcha, Chena, Wood River, Goodpaster, and Healy Lake bands have inhabited the region since protohistoric times and possibly even prehistoric times.[56] Use of the region varied from one band to the next. The Salcha, Chena, Goodpaster, and Wood River bands of the Tanana Athabascans and the Healy Lake band of the Tanacross Athabascans used certain parts of what are now Forts Wainwright and Greely.[57] Several historic village sites have been reported on or near Fort Wainwright. One occupied by the Wood River band is said to have been located in the eastern boundary of Tanana Flats Training Area but has not been found.[58] The Blair Lakes Archaeological District (FAI-335) on Fort Wainwright may relate to the prehistory of the Athabaskan Tradition. Euro-American historic archaeological sites are also present.[59]

2.3 Historic Context

With the beginning of Euro-American contact in Interior Alaska in the early 19th century, trade influences and influxes of new populations began to change life in the region. Land use patterns shifted from traditional indigenous uses to activities based on Euro-American economic and political systems. Historical accounts document traditional settlement patterns that were focused on a widely mobile seasonal round, with the fall caribou hunt playing a pivotal role in subsistence preparations for the winter and summer activities focused at fish camps, berry and root collecting, and in sheep hunting. These activities were frequently communal, with several local bands connected by common interest, geography and intermarriage.[60]

As Euro-American traders, miners, missionaries and explorers moved into the Tanana River Valley, the traditional life ways of local Athabascan groups were disrupted. Access to trade goods and the development of the fur trade not only affected traditional material culture, but also began to dramatically affect subsistence activities and settlement patterns. Similarly, the arrival of missionaries in the Alaskan Interior profoundly influenced traditional social organization. The introduction of mission schools for Native children and the doctrine of new religious beliefs contributed to an erosion of traditional practices.[61]

Russian fur traders began settling Interior Alaska starting in the 1810s, establishing a post at Nulato on the Yukon River and one at Taral on the Copper River. British traders established Fort Yukon in 1847. Trade goods from these posts may have passed to Tanana Athabascans and Upper Tanana Athabascans through intra-Native trade networks. Direct contact between Tanana Athabascans and white traders increased after the 1860s. With the U.S. purchase of Alaska in 1867, control of trading stations and the fur trade passed to Americans. Through the 1880s, American traders established several additional posts on the Yukon and Tanana rivers, including locations at Nuklukayet (modern-day Tanana), Belle Isle (modern-day Eagle), and Fort Yukon.

[55] Andrews. 1975
[56] Andrews 1975
[57] McKennan 1981
[58] Dixon 1980; Reynolds 1986
[59] Gamza 1995; Phillips 1984
[60] McKennan 1981
[61] McKennan 1981

Trade goods introduced by Euro-American settlers influenced the Native lifestyle. Clothing, staples, tools, and other necessities could be obtained through trade. Guns allowed hunters to obtain game with greater efficiency. Gradually, Athabascan Native groups began to alter their traditional nomadic patterns in favor of more permanent settlements. However, while significant, this contact would not have as dramatic an impact on the region as the discovery of gold in the Interior during the last decades of the 19th century. The towns established by Euro-American settlers at the turn of the 20th century, in response to the Klondike Gold Rush and the eventual military development of the region, would rapidly and permanently change the demography and economy of Interior Alaska.

Gold strikes in the Fortymile River region, Birch Creek area, and the Canadian Klondike began drawing miners and prospectors north in the 1880s and 1890s. In response to this gold rush, E.T. Barnette established a trading post on the Chena River in 1901. The following year, prospector Felix Pedro discovered gold nearby, and a new gold rush soon led to the founding of Fairbanks at the site of Barnette's original trading post. Most mining activities in the region occurred on creeks north of Fairbanks, with the town serving as a supply center. Agricultural and other commercial activities, such as lumber, also developed to support mining activities in the Fairbanks area. Homesteads existed on parts of what is today the Main Post of Fort Wainwright as early as 1904.

In 1898, the discovery of gold in the Tanana uplands began a rush of Euro-American settlement into the Tanana River Valley. As the economic importance of the Tanana Valley increased, the need for reliable transportation routes and communication systems rose in tandem. Existing trails, such as the Bonnifield, Donnelly-Washburn and Valdez-Fairbanks trails, saw increased use and development in the first decade of the 20th century. This increase in activity also resulted in the establishment of several roadhouses and posts. In 1906, congressional appropriations led to improvement of the Valdez-Fairbanks Trail, crossing the Alaska Range south of Delta Junction, following the Tanana River to Fairbanks. Completion of the Alaska Railroad in 1923 was followed two decades later by construction of the Alaska Highway in 1942, firmly tying the Alaskan Interior to the outside.

As Fairbanks grew in the first decade of the 20th century, several agricultural homesteads were developed on lands now encompassed by sections of the USAG FWA cantonment. These homesteads provided Fairbanks with a variety of agricultural products and wood for fuel, but were subsumed when lands were withdrawn for the creation of Ladd Field, which later became Fort Wainwright.[62]

Riverboats were the primary means of getting people and supplies into the Interior at the turn of the 20th century. The Fairbanks town site was located at the upper limit of navigation for stern-wheeler riverboats on the Chena River. Upriver from that point, residents navigated the river using willow-draft boats in summer and sleds in the winter. As commerce in the area increased, roads and trails were constructed, sometimes following earlier indigenous routes. The major overland route to tidewater was the Valdez-Fairbanks Trail, which began as a military trail from Valdez to Eagle in 1899.

Transportation and communication networks, including the Alaska Railroad were developed to serve new settlements in Interior Alaska. A branch of the railroad route was extended to Fairbanks in 1904. Roadhouses along the route catered to travelers.[63] Secondary routes connected Fairbanks to the surrounding mining districts.

[62] Price 2002

[63] However, roadhouses were located out on what are now Ft. Wainwright training lands. One property was on the Bonnifield Trail in the Tanana Flats Training Area while two roadhouses and a seasonal tent operation existed along the Donnelly-Washburn Trail in the current Donnelly Training Area.

By 1910, most of the easily accessible placer gold deposits were exhausted, and capital-intensive technologies became necessary to extract remaining deposits. These methods were not possible with the existing transportation infrastructure. The completion of the Alaska Railroad in 1923 expanded transportation options for the region by connecting Fairbanks to the tidewater at Seward and making large-scale dredging operations economically feasible. Aviation also became a key component of Interior transportation, beginning in earnest in the 1920s. However, it was not until 1931 that Weeks Field, originally constructed in 1923, was officially dedicated as an airfield. Industrialized, corporate activity became the hallmark of the region's mining in the remaining years before World War II.

Development in the Alaskan Interior increased dramatically with the advent of World War II and subsequent military build-up in Alaska. Of particular significance was the development of airfields near Delta Junction (Fort Greely), Fairbanks (Ladd Field, later Fort Wainwright) and 26 miles southeast of Fairbanks (Eielson Air Force Base). These locations began as Lend-Lease bases and cold weather testing centers, but soon expanded with the increased need for military support during World War II and later during the Cold War.

Full historic contexts of early mining, transportation, and homesteads on Fort Wainwright have been completed. These studies have determined that there are no properties eligible for the National Register under these contexts. Several village sites associated with the early contact period have been reported near Fort Wainwright. One was reported near Wood River Buttes, two just northwest of the installation's boundary and one near Fairbanks.[64] None have been reported or located on the Main Post.

2.2.1 Military History

The earliest U.S. military activities in the Interior were Army reconnaissance expeditions.[65] In 1899, the Army established posts on the Yukon River at Fort Egbert (near present-day Eagle) and Fort Gibbon (near Tanana). Between 1901 and 1906, the Army constructed a telegraph, cable, and wireless system connecting Alaskan towns and military posts to Seattle. No sites associated with these early military activities have been identified on Fort Wainwright-managed lands. An early Signal Corps station was located on the current site of today's Alaska Communication Service facility, located adjacent to Fort Wainwright Main Post.

In 1939, construction began on Ladd Field. The airfield was intended to be an experimental station for cold weather testing. Ladd Field was initially designed to be a small permanent facility. The original construction included a 5,000-foot concrete runway and aircraft parking apron, nine administration and housing buildings, six technical buildings, a medical corps building, tactical fuel storage, and utilidors. The testing program's major goals were to develop standard procedures for servicing and operating aircraft in subzero temperatures and to evaluate the cold weather performance of all aircraft components. The testing program also investigated other important aspects of arctic operations such as clothing, communications equipment, survival gear, medical issues, and ground support.

With the outbreak of war, Ladd took on additional roles as a supply and repair depot for the Air Transport Command and became a busy cargo and passenger flight hub. In a unique high priority mission, it served

[64] Reynolds 1986

[65] In 1869, Capt. Charles W. Raymond led a survey expedition from St. Michael to Ft. Yukon. Lt. Frederick Schwatka led an 1883 reconnaissance of the Chilkoot Pass and Yukon River, and Lt. Henry T. Allen's party traveled through the Copper River and Tanana River valleys in 1885. Responding to the Klondike Gold Rush, Capt. Patrick Ray and Lt. Wilds P. Richardson reported on conditions along the Yukon River in 1897. In 1898, parties under Capt. E.F. Glenn and Lt. J.C. Castner conducted expeditions in the Tanana and Yukon River regions. 172nd Infantry Brigade, *The US Army in Alaska*, May 1976, 12, 24, 28, 34-40.

as the transfer point for over 7,900 Lend-Lease aircraft bound for the Soviet Union on the Alaska-Siberia route, hosting a contingent of Soviet representatives and mechanics as well as transient aircrews from both nations.

To accommodate these wartime needs, the airfield expanded in both acreage and infrastructure. By the war's end in 1945, Ladd Field had over 700 buildings, seven hangars, two runways, fuel facilities, and could accommodate 4,555 personnel. Over 19,000 acres were added to the original 960-acre cantonment between 1940 and 1943. In addition, 655,000 acres were withdrawn during this time for a bombing and gunnery range, which is now known as the Tanana Flats Training Area. During the same period, military airfields were also constructed at Big Delta and other Interior locations.

In 1985, the Ladd Field World War II National Historic Landmark (Ladd Field NHL) was designated in recognition of Ladd Field's role in World War II. The Ladd Field NHL is a multiple property district encompassing the core permanent buildings around the North Post, and the airfield. It also includes structures such as utilidors and runways.

When the Air Force became a separate branch of service in 1947, Ladd Field was re-designated as Ladd Air Force Base. During the early Cold War years of 1947 to1961, when relations with the Soviet Union were extremely strained, Ladd Air Force Base served as the Northern Sector Command Center for the Alaskan Command. Its foremost missions in the Cold War were air defense, strategic reconnaissance of the Soviet Union, and arctic research; others included search and rescue, tactical support, communications, and training. Ladd's air defense mission was part of a plan to deter the Soviet Union from taking Alaskan territory and using it as a base from which to threaten the continental United States. Ladd provided support to the Distance Early Warning Line, the warning system which served to alert continental defenses and the Strategic Air Command of polar air attacks.

Ladd Air Force Base was also the scene of significant Cold War arctic research. The Arctic Aeromedical Laboratory studied human adaptation to arctic and subarctic climates, and the cold weather equipment testing program, which began during World War II, continued on a smaller scale. The Army was also present at the base to provide anti-aircraft and ground defense.

To support Ladd's Air Force and Army missions, a major construction program was initiated in the 1950s. Several hundred temporary World War II buildings in ad hoc cluster patterns were removed, and new construction was patterned on a stricter grid system. Bassett Hospital, the Arctic Aeromedical Lab, housing on North and South Posts, new barracks, a missile multicube, and an Air Defense Command Center were part of this buildup.

In recognition of the exceptional significance of the Air Force missions at Ladd, the Cold War Historic District was determined eligible for the National Register in 2001. The boundary of this district overlaps the footprint of the Ladd Field NHL and extends outward to include mission-related buildings constructed by the Air Force during the 1947-1960 period of significance.

On January 1, 1961, the Army took command of Ladd Field and renamed it Fort Jonathan Wainwright. The Army's missions for the next 15 years included: ground and anti-aircraft defense of Alaska and its Air Force installations against possible Soviet attack, northern warfare doctrine development, training support, logistics, National Guard and Reserve support, and civil defense assistance. NIKE missile batteries were in operation from 1959 to 1971. In the early 1970s, Army Commands were reorganized, but training and defense missions remained essentially the same until 1986. Tight fiscal and personnel resources in the 1970s resulted in a surplus of facilities at the installation. The Army made several of these facilities available to the Alyeska Pipeline Service Company during the construction of the Alaska

Pipeline. Other facilities were leased out to the BLM in the mid 1980s, and a number of these out-grants remain in effect.

In 1986, the 6th Infantry Division (Light) was activated at Fort Wainwright. Its primary mission was to function as a rapid deployment force, ready for combat anywhere in the world on short notice. The defense of Alaska and other familiar activities continued under the 6th LID as additional missions. The Division brought 1,800 additional personnel plus their dependents to Fort Wainwright. A new Post Exchange, gymnasium, medical center, range facilities, housing, and battalion headquarters were built to support the activation of the Division and marked the first new construction on the installation since the Air Force's major construction activities in the 1950s. The 6th LID was inactivated in 1994 and replaced by U.S. Army Alaska. Today, USAG FWA supports the 16th Combat Aviation Brigade, 1st of the 25th Stryker Brigade Combat Team, and additional support units and tenant agencies.

2.2.2 Donnelly Training Area History

DTA, formerly known as Fort Greely, originated as Station 17, Alaskan Wing, Air Transport Command, (later known as Allen Army Airfield in 1942). In 1949, the installation became the site of the Arctic Training Center (Headquarters, U.S. Army Pacific 1996), because of its extreme winter conditions in Interior Alaska and varied terrain, including rivers, lakes, swamps, and open plains. The post was designated as Fort Greely on August 6, 1955. Fort Greely became part of the 172nd Infantry Brigade in 1974, when U.S. Army Alaska was restructured. Fort Greely was closed as part of the 1995 Base Realignment and Closure process. Fort Greely later reopened under command of Missile Defense with a much reduced footprint. Some 624,000 acres, which included testing ranges, firing ranges, maneuver training areas and other training facilities, were ultimately transferred to Fort Wainwright and would become known as DTA. Three outlying training areas, Black Rapids, Gerstle River and Whistler Creek Rock Climbing, were also transferred to Fort Wainwright.

2.3 Mission Activities, Organizations and Programs that May Affect Cultural Resources

2.3.1 Training

Off-Road Maneuver: Various types of off-road maneuver exercises occur on USAG FWA-managed lands. These include use of light tracked vehicles, trucks, and small four-wheel drive vehicles, and heavy tracked vehicles such as tanks. Maneuver training may involve ground disturbance that can negatively impact archaeological sites. Some training areas receive relatively heavy training pressure (and therefore have greater potential for ground disturbance), while other areas are less intensively used. Environmental factors play a role in scheduling, as wetlands and alpine areas are protected. Off-road activity by tracked vehicles in winter has a low potential for impacting archaeological resources when the ground is frozen and there is adequate snow cover. Activities by these vehicles in summer have an increased potential to damage or destroy archaeological resources.

Excavation: Excavation and ground-disturbing activities associated with military training activities can damage or destroy archaeological sites. Common training activities requiring excavation and ground disturbance may include, but are not limited to, trenches, bombing, artillery fire, foxholes, bivouacs, and tank traps. Engineering units train to provide infrastructure to combat units during combat situations. This training includes digging trenches to lay pipes and other utilities.

Weapons Training: The requirement for live-fire weapons training has the potential to affect cultural resources. Weapons proficiency is a critical component of combat. Direct live-fire training normally entails an individual gunner, the crew of a weapon system, or a collective unit firing at predetermined targets from designated firing positions on a designated range facility. Field artillery and mortar units fire live ammunition indirectly (where the gunner relies on an observer to direct fire using indirect overhead arching ballistics) into the impact area from designated firing points. Impact areas are required for live-fire training. An impact area is simply a designated site used for training with live munitions. A dud-producing impact area is a site where live-fire munitions such as mortars or howitzers are used that might result in unexploded ordnance remaining at the impact site. Unexploded ordnance are munitions (bullets, mortars, grenades, etc.) that did not explode when they were employed and still pose a risk of detonation. Activities occurring in a dud-producing impact area are streamlined undertakings addressed by the Operations and Maintenance Programmatic Agreement because of the safety issues involved in surveying those areas.

2.3.2 Recreation

Access and Recreation: Outdoor recreation opportunities contribute to the quality of life not only of the military community, but also of the Alaskan community in general. USAG FWA provides quality opportunities for outdoor recreation (e.g., hunting, fishing, off-road vehicle areas, and winter recreation). However, the policy of public access has the potential to increase the risk of vandalism to cultural resources.

Vandalism: Vandalism to cultural resources can cause the loss of historic integrity. Vandalism of archeological sites on federal land is a violation of the ARPA and will be criminally prosecuted.

Conservation Enforcement: Conservation enforcement has the potential to affect cultural resources in a positive way by enforcing ARPA and ensuring recreational impacts on cultural resources are minimized.

2.3.3 Installation Management

All the following actions have the potential to affect historic properties and need to be reviewed by the Cultural Resources Section's staff to ensure compliance with Section 106 and other relevant laws.

Maintenance and Upgrade: Road and trail repair, grading, upgrading, and snowplowing all have the potential to impact archaeological resources. Although these facilities exist, their maintenance and upgrade can affect cultural resources.

Construction: Mission requirements may make construction of new facilities necessary. The excavations for building foundations, utilities, and roads can disturb or destroy archaeological sites. New construction can affect cultural resources by being placed too close to existing historic properties, obscuring site lines, causing in-fill and changing spatial relationships between properties.

Vegetation Management: Activities such as the removal or planting of trees and vegetation outside the cantonments can disturb archaeological sites. Heavy equipment sometimes used in these activities may also have an adverse effect on archaeological sites.

Maintenance and Renovation of Buildings and Structures: Maintenance activities can destroy or alter features of a historic property. Replacement of doors or windows with a new type can alter the historic character of a building or structure. Painting with colors inconsistent with those in use during a property's period of significance can also have an adverse effect.

Demolition: Demolition of historic properties obviously negatively affects the resources and should be done only as a last resort. The decision to demolish a facility should be justified with a life-cycle economic analysis. Potential reuses of the building must be considered prior to the decision to demolish.

Landscaping: Landscaping not consistent with a historic property's landscape during its period of significance can diminish the property's historic integrity.

In-action: Avoidance and neglect of historic buildings and structures can result in deterioration and loss of integrity. A decision not to maintain a historic property is considered an undertaking and requires NHPA Section 106 compliance.

2.3.4 Programs

Sustainable Range Management: Range operations and maintenance have the potential to affect cultural resources during the operation and maintenance of ranges and training lands to sustain long-term doctrinal training requirements. Integrated Training Area Management (ITAM) enables the Army mission by managing and maintaining training lands to sustain and enhance the capability to meet long-term doctrinal requirements.

An important component of ITAM is Land Rehabilitation and Maintenance (LRAM). LRAM involves repair of damaged lands and use of land construction technology to avoid future damage to training lands. LRAM uses technologies, such as revegetation and erosion control techniques, to maintain soils and vegetation required for accomplishment of the military mission. These efforts are specifically designed to maintain quality military training lands and minimize long-term costs associated with land rehabilitation or additional land acquisition (CEMML and Gene Stout & Associates 1998a: 126).

Through the use of heavy equipment and erosion control techniques, LRAM may result in ground disturbance that can negatively impact archaeological sites. Generally, LRAM does not require extensive use of heavy equipment or massive land reshaping (CEMML and Gene Stout & Associates 1998a:126). LRAM projects are also planned to avoid significant archaeological sites or areas of cultural resource sensitivity.

Environmental Management: Some environmental protection measures have the potential to affect cultural resources. Spill response and environmental remediation may result in disturbance to archaeological sites if soils are excavated. Environmental personnel should be aware of the presence of archaeological sites to avoid inadvertent damage. The incorporation of archaeological maps into Geographic Information System (GIS) databases aids awareness.

Environmental conservation can affect cultural resources by providing stewardship. The purpose of the Environmental Conservation Program is to enable the Army mission by characterizing, monitoring, complying and continuing oversight of installation natural and cultural resources. Conservation allows Army managers to exercise stewardship of natural and cultural resources by facilitating the planned management of natural and cultural resources. This is accomplished in coordination with facility managers, trainers and other land users, through funding and implementation of projects that help preserve, maintain, repair and improve natural and cultural resources for sustaining mission requirements.

Facilities Management: Facilities management has the potential for impacting cultural resources through two programs: Base Operating Support and Real Property Services. Real Property Services provides for support elements and services identified as indirect overhead by Headquarters Department of Army and

grounds maintenance activities. This includes abatement and disposal of building hazardous waste resulting from the performance of Real Property Services. The Sustainment, Restoration, and Modernization Program enables the Army mission by providing the sustainment of range and other facilities in good working order to meet long-term doctrinal training requirements. These requirements include restoring failed or failing facilities, systems, and components damaged by a lack of sustainment, excessive age, fire, storm, flood, freeze, or other natural occurrences; improving facilities to current standards and modernizing facilities to meet new standards; and the erection, installation, or assembly of a new real property facilities; the addition, expansion, extension, alteration, conversion, or complete replacement of an existing real property facility.

2.3.5 Organizations

The cantonment areas are comprised of all the facilities and infrastructure that support a functioning military community. Routine activities within the cantonments may affect cultural resources. In addition, activities in support of the maintenance of the larger installation property can affect historic properties. Numerous organizations use Fort Wainwright under host-tenant agreements or arrive periodically to use the facilities under temporary agreements. The missions of these user groups have the potential to affect historic properties. Key users include the Directorate of Public Works , Directorate of Logistics, Directorate of Emergency Services, Regional Contracting Office, Directorate of Community Affairs, Public Affairs Office, Directorate of Plans, Training, Mobilization and Security , Office of the Staff Judge Advocate, Cold Regions Research and Engineering Laboratory, Northern Warfare Training Center, United States Air Force, other military entities that conduct training exercises on USAG FWA-managed lands, and Bureau of Land Management, Alaska Fire Service.

3 CULTURAL RESOURCES INVENTORY

This section describes the known cultural resources on USAG FWA-managed lands including historic buildings and archaeological sites. This section also details the reports, contexts, and other documentation of these resources.

3.1 Archaeology

Fort Wainwright and its training lands contain 636 known archaeological sites and four archaeological districts. Sixty sites are eligible for the National Register, 512 sites have not been evaluated, and 64 additional sites have been determined not eligible for the National Register. Of the eligible or un-evaluated sites, 12 are historic sites and 560 are prehistoric sites.

Archaeological surveys of the Fort Wainwright Main Post area began in 1979. James Dixon[66] surveyed the north side of the Chena River and Birch Hill area, discovering several prehistoric archaeological sites (FAI-40, 41, 42, 43, 199, and 200). Surveys of the Main Post building areas continued in the 1980s by Julia Steele[67] and Georgeanne Reynolds.[68] No sites were found in these previously disturbed areas. John Cook surveyed the River Road pond in 1996 and found one site (FAI-509), which has failed to be relocated in subsequent attempts. In 2001, the Army began partnering cultural resource surveys and evaluations with Colorado State University's Center for Environmental Management of Military Lands (CEMML). Surveys by several different principal investigators have targeted areas of construction undertakings. Two historic sites (FAI-1603 and 1604) and one additional prehistoric site (FAI-1990) were found in these investigations. In 2011, CEMML completed survey of the entire cantonment, north and south of the Chena River, discovering one additional historic site (FAI-2117). Of the 11 archaeological sites known from the Fort Wainwright cantonment, two (FAI-1603 and 1604) have been determined not eligible. The remaining sites have not yet been evaluated.

The majority of military activity on post consists of construction projects in previously disturbed areas. For management purposes, Determinations of Eligibility (DOEs) of all existing sites in the cantonment are planned during the span of this ICRMP.

Archaeological sites were first identified in the Tanana Flats Training Area (TFTA) in 1973 by Zorro Bradley and others[69] who conducted a survey in the Blair Lakes area. James Dixon[70] continued surveys for archaeological district designations in the regions of Blair Lakes (District FAI-335), Clear Creek Butte (District FAI-336), and Wood River Buttes (District FAI-337). In 1993, proposed work in the Clear Creek Butte area prompted a contract to relocate several archaeological sites.[71] These three districts have been revisited by CEMML archaeologists a few times over the last decade, and notably, 92 new sites were found in 2009-2010 during survey of the Wood River Buttes, Salmon Loaf, and north and east of Blair Lakes. In total, archaeologists have identified 147 archaeological sites in TFTA. Of these sites, 11 have been determined eligible for inclusion in the National Register (FAI-44, 45, 46, 48, 49, 54, and 194 to 198), two are not eligible (FAI-1607 and 2046), and 134 remain to be evaluated for eligibility.

[66] Dixon et al. 1980
[67] Steele 1992, 1983
[68] Reynolds 1983, 1985
[69] Bradley et al. 1973.
[70] Dixon et al. 1980
[71] Staley 1993

Much of TFTA has had no archaeological inventory. Upcoming Joint Alaska Pacific Range Complex projects will include ground disturbance in un-surveyed areas. The footprints of the areas of potential effects (APEs) will guide survey and inventory efforts in the Tanana Flats.

The road system in the Yukon Training Area (YTA) was the first of many areas to be investigated. Charles Holmes[72] discovered eight sites in a 1978 road survey. John Cook[73] conducted a DOE evaluation on one of these sites in 1979. Michael Kunz surveyed the Stuart Creek Area in 1992 but discovered no archaeological sites, and Northern Land Use Research's[74] (NLUR) 1999 survey of Stuart Creek and the YTA road system uncovered one historic site. CEMML archaeologists have been surveying portions of YTA in conjunction with construction projects on an annual basis since 2001. Currently, North Beaver Creek, Skyline, Johnson, Quarry, Brigadier, and Manchu roads in YTA are almost entirely surveyed, as is the area east of Skyline Road outside of the Stuart Creek Impact Area, McMahon Trench, the Manchu Range, and the majority of Training Areas 307 and 310 north and south of Manchu and Quarry roads. Twenty archaeological sites have been identified in YTA. Ten of the sites have been determined not eligible for listing in the National Register (FAI-157, XBD-93, 94, 95, 103, 104, 186, 260, 264, and 266), and 10 have not been evaluated. XBD-162 will not be evaluated due to its location in a heavily-used portion of the Stuart Creek Impact Area. Future investigations in YTA will be concentrated on the northern roads (western portion of North Beaver Creek Road) and the northwestern portion of the training area around Husky Drop Zone and Transmitter Road, where FWA Range Control predicts development.

Archaeological investigations in what is now the Donnelly Training Area (DTA) began in the 1960s, when Frederick West was searching for sites related to the first Americans.[75] He excavated the Donnelly Ridge Site (XMH-5) in 1964 and found an assemblage containing microblade core technology similar to early Holocene Denali Complex sites. Several surveys[76] of Fort Greely and adjacent training lands in the late 1970s documented 64 new sites. Julia Steele[77] surveyed various locations in DTA from 1980-1983, finding four additional new sites, and Georgianne Reynolds[78] surveyed the Donnelly Dome area in 1988, locating one more. Investigations in DTA from 1992-2002 were made by D. Staley,[79] T. Gamza,[80] A. Higgs,[81] and D. Odess.[82] Sixteen new sites were found during this decade of fieldwork and attempts were made to relocate old sites.

Concentrated efforts to expand survey coverage of DTA East began with CEMML archaeologists in 2002. Over 200 new sites were located in the Texas Range, Donnelly Drop Zone, and Eddy Drop Zone in the first half of the decade. In 2007, one site was found in the northernmost portion of DTA West by Ben Potter and others[83] during survey for the Alaska Railroad Northern Rail Extension Project. In recent years, CEMML research aimed to evaluate many known archaeological sites in DTA for inclusion in the National Register in conjunction with use of the Battle Area Complex and its surface danger zone. Sites have also been discovered during surveys for road and trail maintenance. Potential expansions into DTA West, west of the Delta River, have prompted recent surveys into new areas such as Molybdenum Ridge, where 21 new sites were discovered in 2011. Because of its remote setting, however, the archaeology of Donnelly West is still poorly understood and represents a gap in USAG FWA's inventory of cultural

[72] Holmes 1979
[73] Cook 1979
[74] Higgs et al. 1999
[75] West 1967
[76] Rabich and Reger 1977; Bacon 1979; Holmes 1979; Bacon and Holmes 1979
[77] Steele 1980, 1980, 1982, 1982, 1983, and 1983
[78] Reynolds 1988
[79] Staley 1993
[80] Gamza 1995
[81] Higgs et al. 1999
[82] Odess 2002
[83] Potter et al. 2007

properties. The Cold Regions Test Center has also contracted with CEMML and others[84] since the last ICRMP (2001) to survey areas in DTA West, east of the Little Delta River, and many new archaeological sites have been recorded.

To date, 455 archaeological sites have been identified within DTA. Forty-nine sites have been found to be eligible for the National Register, and 50 were found not eligible. An additional 356 sites remain to be evaluated. Historic archaeology sites are poorly represented in this region, with only six currently known to exist. The Donnelly Ridge District (XMH-388) encompasses Denali sites identified by Frederick West, south and west of Donnelly Dome. Future archaeological studies in DTA will concentrate on completing survey of 100% of the land in DTA East, conducting DOEs on archaeological sites in high traffic areas, and exploring parts of DTA West that are opening up for expansion of military training activities.

The Gerstle River and Black Rapids Training Areas, also managed by Fort Wainwright, have been infrequently utilized by training activities, and very few surveys with the objective of identification of archaeological sites have occurred in these areas. CEMML archaeologists surveyed two small portions of Gerstle River Training Area in 2011. One prehistoric site (XMH-1359) is previously known from this training area. Two sites, which have not been evaluated for the National Register, have been discovered in Black Rapids Training Area (XMH-317, 318). Future research is planned for Gerstle River Training Area where military activities are planned to take place in the next five years.

3.2 Historic Buildings and Structures

The National Park Service conducted the first building survey of Fort Wainwright in 1984. This survey was conducted to identify extant buildings associated with the World War II era Ladd Field, and resulted in the designation of Ladd Field as a National Historic Landmark (NHL) (Appendix B).

Almost the entire Fort Wainwright Main Post has been inventoried and evaluated for eligibility for inclusion in the National Register under World War II and Cold War historic contexts (Appendix A). As part of the World War II context, Ladd Field has been designated an NHL. The Ladd Field NHL includes 20 buildings and structures centered on the runways (Appendix A).

Under the Cold War context, the Fort Wainwright Main Post has been inventoried and evaluated, with 36 buildings and structures contributing to the Cold War Historic District (Appendix 1: Table 18). This historic district was determined eligible for inclusion in the National Register in 2001, with 68 contributing resources. It was re-evaluated in 2010 during which time it was reduced in sized, removing 32 buildings from the district.

Also, in 2010, USAG FWA determined three buildings to be individually eligible for the National Register: Building 1060, Building 4391, and Building 4070. Previously, Building 1060 and Building 4070 had been part of the Cold War Historic District.

[84] Espenshade 2010

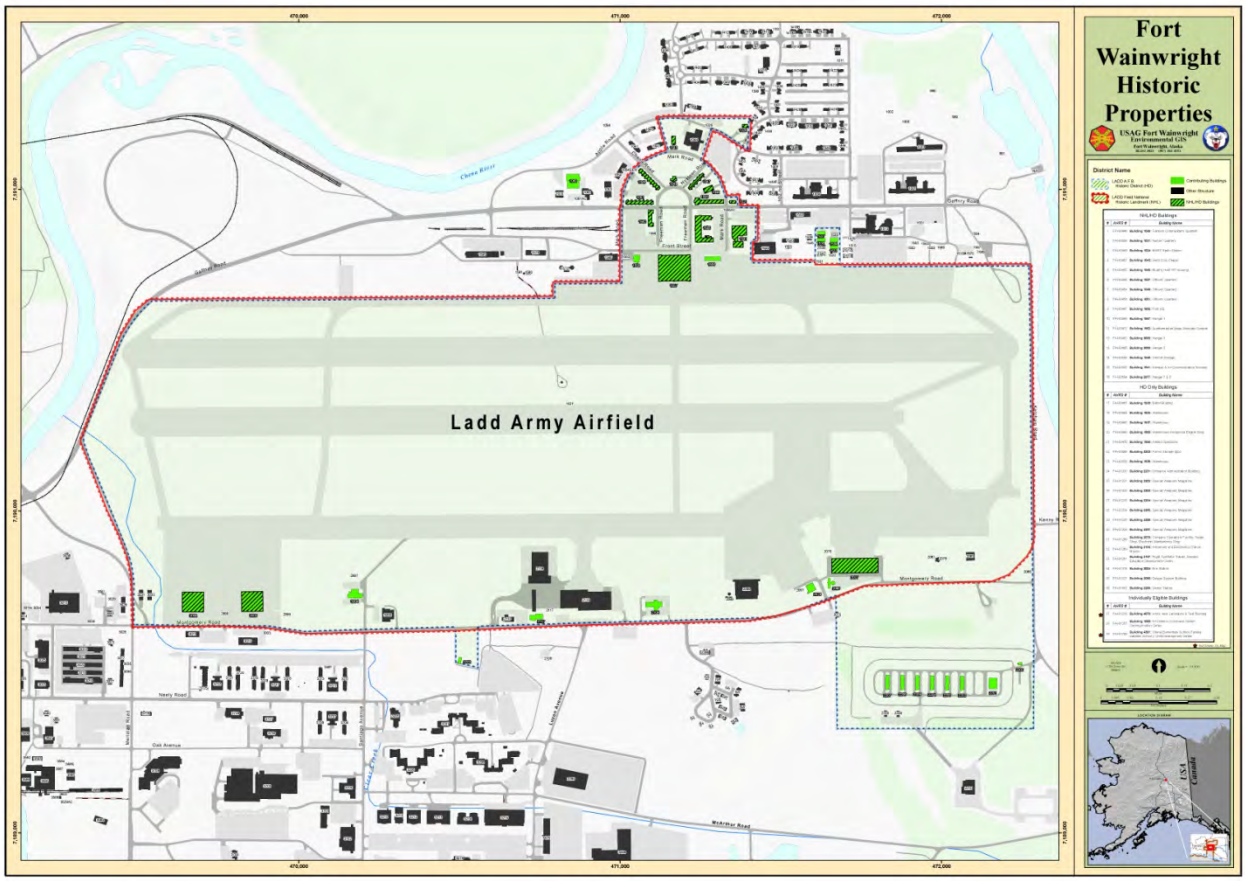


Figure 2. Map of Ladd Field NHL and Cold War Historic District

3.3 Properties of Traditional Religious and Cultural Significance

USAG FWA is aware that properties of traditional religious and cultural significance to Alaska Native tribes may be present on lands it manages. Efforts have been made to document these sites, utilizing input from indigenous land users. To date, one report has been produced to document the possible properties on lands at DTA. The report, *Culturally Significant Site Survey: Donnelly Training Area, Alaska*, was completed in 2008 and consisted of a series of interviews with tribal members from Upper Tanana tribes. The report did not find any properties of traditional religious and cultural significance, but USAG FWA recognizes these types of reports often cannot be exhaustive. The Army is open to new information on properties of traditional religious and cultural significance on the lands it manages as the information comes available.

3.4 Documentation of Cultural Resources

The following sections summarize publications produced for or about Fort Wainwright cultural resources. Many of these publications can be found on the Fort Wainwright Environmental website at <http://www.wainwright.army.mil/env/CR_PublicOutreach.html>, and hard copies are available through the Cultural Resources Section by calling (907.361.3002), emailing (lisa.m.graham52.civ@mail.mil), or visiting the office in Building 3023 on Fort Wainwright.

Over the past 10 years, the USAG FWA Cultural Resources Section has developed a number of publications that are used to facilitate public outreach. Also, USAG FWA disseminates information about cultural resources in several different ways including making the Fort Wainwright reports available to the public, giving lectures and tours, meeting with interested groups, giving professional presentations, and providing articles for local and statewide publications. In recent years, the Cultural Resources staff has given several professional presentations at conferences including the Society for American Archaeology, the American Anthropological Association and DoD-sponsored events.

3.4.1 Historic Context Reports

Over the last 12 years, USAG FWA has developed a number of historic context reports in support of Section 110 and Section 106 of the NHPA. These reports include:

- *The World War II Heritage of Ladd Field, Fairbanks, Alaska* (2004)
- *Northern Defenders: Cold War Context of Ladd Air Force Base, Fairbanks, Alaska* (2001)
- *Early Mining History, Fort Wainwright and Fort Greely, Alaska* (2001)
- *Early Transportation Routes, Fort Wainwright, Alaska* (2002)
- *Homesteads on Fort Wainwright, Alaska* (2002)
- *The Haines-Fairbanks Pipeline* (2003)
- *Nike Hercules Operation in Alaska* (2004)
- *Tracking the Unthinkable: the Donnelly Flats MIDAS Ground Station and the Early Development of Space Warning Systems, 1959-1967* (2006)
- *Cold Weather Testing in Alaska* (2011)

3.4.2 Archaeology Reports

The first archaeological survey of USAG FWA-managed lands took place in the 1960s. Since that time, numerous reports on individual sites, full surveys, and on effects of projects on archaeological sites have been completed. For the last 10 years, a substantial amount of archaeological survey has occurred in a more predictable, yearly fashion. The results of those surveys are compiled to produce annual or semi-annual reports. All archaeological surveys are listed in Appendix E.

3.4.3 Public Outreach Publications

USAG FWA has produced three pamphlets for public outreach. Two of the pamphlets focus on the historic districts within the Fort Wainwright cantonment and the third summarizes laws and responsibilities pertaining to archaeological sites on military lands. Also, in 2011, a driving tour guide was produced for the NHL. The driving tour contains brief histories of the individual buildings, photographs, and driving directions. USAG FWA developed two publications geared toward school children, a lesson plan on Ladd Field based on the NPS' *Teaching with Historic Places* standards and a teachers' toolkit on Alaska archaeology. Lastly, a series of seven interpretive panels that focus on Fort Wainwright's World War II history are located throughout the NHL.

3.4.4 Building Documentation

A number of buildings on Fort Wainwright have been documented using *Historic American Buildings Survey* standards including Buildings 1047, 1043, 1021, 1557, 1555, 1048, 1024, 1049, 1562, 3005, and 3008. Also a full condition assessment and rehabilitation plan and reuse study have been conducted for Building 3005 and 3008. The majority of buildings over 40 years old on Fort Wainwright have been

surveyed, and their building survey information, including photographs, is compiled in an Access database.

4 GOALS AND OBJECTIVES

The purpose of this section is to establish proactive guidance for consideration of preservation concerns to integrate into day-to-day installation activities. To effectively meet the USAG FWA goal to integrate cultural resources stewardship with mission and training requirements, this section will include a description of the desired future condition for historic properties over the five-year planning period at Fort Wainwright. It also establishes management practices that will be employed to achieve the desired future condition and management goals.

4.1 Overall Goals

- Comply with federal laws and regulations governing the treatment of historic properties in ways that meet and support USAG FWA's military mission.
- Maintain a Cultural Resources staff that meets the qualifications for archaeologist, historian, architectural historian, and/or historical architect in accordance with *The Secretary of the Interior's Professional Qualifications Standards* (36 CFR § 61) .
- Continue professional development of staff through yearly applicable training and participation in professional conferences and publications.
- Recognize the special expertise of Alaska Native tribes and the value of indigenous knowledge and oral history in documenting the past.
- Inventory and evaluate historic properties for eligibility to the National Register. Re-inventory and re-evaluate historic properties on five to ten-year cycles.
- Minimize adverse effects on resources that are eligible for inclusion in the National Register, preventing vandalism and destruction of historic properties.
- Develop efficient management procedures that streamline consultation.
- Conduct appropriate maintenance, repair, and rehabilitation of historic properties as identified and as funding is available.
- Undertake maintenance and repair activities in accordance with *The Secretary of the Interior's Guidelines for the Treatment of Historic Properties*.
- Preserve significant historic properties whenever possible and mitigate appropriately in the long-term public interest when adverse effects cannot be avoided.
- Coordinate consultation with Alaska Native tribal governments on a government-to-government basis as required by Executive Order 13175 and DoD American Indian and Alaska Native policy.
- Maintain confidentiality of the nature and location of archaeological sites.
- Programmatically manage archaeological sites by focusing on site distribution and association.

4.1.1 Archaeological Resources

The desired future condition for USAG FWA's archaeological resources focuses on the need to preserve our heritage and manage cultural resources on USAG FWA-managed lands. The first step in accomplishing that goal is to inventory and evaluate archaeological sites to the greatest extent possible. The second step is, when feasible, to avoid the sites completely when conducting military training and siting new construction. If avoidance is not feasible, protective steps will be taken to limit damage to the site or mitigate when adverse effects cannot be avoided or minimized. The third step is to monitor those sites that were identified during the inventory phase. Archaeological inventory is a major task of USAG FWA's Cultural Resources Section during the current planning period. Additionally, management practices for these properties on USAG FWA-managed lands are in continuous development through consultation with neighboring Alaska Native tribes.

4.1.2 Sacred Sites and Traditional Cultural Properties

USAG FWA is aware that properties of traditional religious and cultural significance to Alaska Native tribes may be present on lands it manages. Identifying and managing these properties is a high priority in the sound management practices for cultural resources on USAG FWA-managed lands. Efforts have been made to document these sites, utilizing input from indigenous land users. To date, one report has been produced to document the lands at DTA. Future study will be expanded to include all other training lands. The desired future condition for these resources is to identify and manage them in consultation with Alaska Native tribes.

4.1.3 Historic Buildings, Structures, and Objects

The overall goal is to provide sound stewardship of buildings, structures, and objects that are eligible for listing or that are listed in the National Register. USAG FWA's goal is to maintain these historic properties' eligibility while adaptively reusing them to the maximum practical extent. To reach that condition while meeting mission requirements, the need for increased funding for rehabilitation and maintenance should be addressed.

4.2 Planning Objectives

In order to meet the goals outlined in Section 4.1 of this chapter, the following objectives have been established:

- Develop appropriate procedures to ensure that all contractors generating undertakings on behalf of USAG FWA are directed to meet standard review requirements.
- Develop, improve and expand the awareness of historic properties and their preservation on the part of military and non-military personnel.
- Provide opportunities for the Cultural Resources Section to take part in additional training.
- Use agreements to obtain technical assistance from appropriate parties, including Alaska Native tribes and other consulting parties, in managing historic properties on USAG FWA-managed lands.
- Request and consider input from interested parties and Alaska Native tribes early in project planning stages.
- Implement a cultural landscape planning approach to cultural resources management that recognizes the complexity of the human cultural interaction with the natural terrain through time.
- Develop an interpretive program for public education and outreach.
- Include a new GIS data layer for traditional Alaska Native place names, to be documented through literature and archival reviews and oral histories. This work will be accomplished cooperatively with tribes.
- Develop and update cultural resources data layers for the GIS, including data on archaeological sites and historic buildings and structures.
- Use the monitoring program to evaluate the effects of training, construction, and recreation on historic properties.
- Update and maintain GIS records of eligible archaeological sites and past survey locations to streamline consultation. The GIS records of archaeological sites and districts should be located on a local server only accessed by the Cultural Resources Section staff and GIS analyst records.
- Use AEC's Layaway Economic Analysis computer program obtained from the AEC to document cost comparisons of demolition with other potential use options.

- Coordinate identification, evaluation, and management of properties that have traditional religious or cultural importance to Alaska Native tribes.
- Develop a system to monitor archaeological sites that are eligible for inclusion in the National Register.
- Develop and utilize a predictive model for identifying potential locations of archaeological sites and generate a schedule for surveying military lands that have not yet been surveyed.
- Annually conduct at least 25 DOEs (or re-evaluations of eligibility) on archaeological sites beginning with those in heavily used areas and potential development zones.
- Reassess the four existing Fort Wainwright districts and any sites that should be added or removed from those districts.
- Develop a system to monitor maintenance and repair activities on historic buildings and structures.
- Update all databases to depict accurate, current information on all cultural resources.
- Establish (or continue to improve upon) protocols for maintaining confidentiality of archaeological site location information as well as sacred sites, Traditional Cultural Properties, and sites of traditional religious and cultural significance to tribes, as appropriate
- Conduct surveys to recognize areas with heavy recreational traffic. Once those areas are identified, they would be subjected to archaeological inventory. If a recreational area is found to contain historic properties or archaeological sites, measures will be taken to eliminate or minimize potential adverse effects.

5 MANAGEMENT PLAN

5.1 Archeological Resource Protection Act Procedures

The Archaeological Resource Protection Act (ARPA) (16 USC. 470cc), requires that all federal land managers inventory archaeological sites within their property boundaries and monitor these sites for damage or disturbance. Individual agreements have been put in place to protect archaeological sites in areas of heavy military activity (e.g., Battle Area Complex Surface Danger Zone, DTA) and USAG FWA is in the process of developing a monitoring program. This will include conducting Determinations of Eligibility on sites in high traffic areas. Vandalism has not been a problem on USAG FWA-managed lands, but unmonitored construction and routine military activities may have affected archaeological sites in the past.

In the event that inadvertent damage to a cultural resource is detected, the Cultural Resources Section will immediately review site records, evaluate the remainder of the site for eligibility in the National Register, and assess the site for adverse effects. If the site is eligible and continues to be in danger of damage or destruction, appropriate mitigation measures will take place (e.g., excavation, barricading, capping, etc.) after consultation with the SHPO. If the damage is determined to be severe and/or the site has been determined to be significant, the Cultural Resources Manager will document the damage and provide such documentation in a report to the SHPO.

Intentional destruction of an archaeological site is in direct violation of ARPA. As per Section 6 of ARPA (16 USC 470ee), no person may excavate, remove, damage or otherwise alter or deface any archaeological resource or sell, purchase, exchange, or transport any archaeological resource if the resource was excavated or removed from public lands. In the instance that excavation without a permit or selling of artifacts is identified, the federal land manager is responsible for pursuing charges. The remaining portions of the site will be evaluated for eligibility in the National Register, and appropriate mitigation measures will take place in consultation with the SHPO and BLM.

It is possible that archaeologists affiliated with universities, museums, or other agencies would consult USAG FWA to conduct an excavation of a site. As per Section 4 of ARPA (16 USC. 470cc), permits for excavation or removal of archaeological resources on USAG FWA-managed land can be distributed to the qualified applicant for the furthering of archaeological knowledge by the federal land manager. Concerning all non-military actions, the federal land manager for lands withdrawn by the Army is the BLM. All queries regarding third-party archaeological research on Army land will be directed to the local BLM archaeologist for Fort Wainwright lands.

5.2 National Historic Preservation Act's Section 110 Procedures

Section 110 of NHPA states that the federal agency must assume responsibility for the preservation of historic properties that are owned or controlled by the agency and that the federal agency should use, to the maximum extent possible, historic structures that are available. Section 110 reinforces the responsibilities of the federal agency to inventory, evaluate, and preserve historic properties. It is the responsibility of the agency to establish a program to locate, inventory, and nominate to the Secretary of the Interior all cultural resources that appear to qualify for inclusion in the National Register. Also, planning and other actions necessary to minimize harm to all National Landmark sites will be undertaken when a project may adversely affect such historic properties.

5.2.1 Identification and Evaluation Historic Properties

Surveys will be conducted as funding permits to cover large tracts of land, with a focus on areas of concern for archaeological sites, Traditional Cultural Properties, and historic buildings, structures, and objects. In the case of archaeological sites, areas that combine significant potential for mission-related ground disturbance and high archaeological sensitivity will be given priority. The advantage of these surveys is that they provide a more comprehensive understanding of archaeological resources on USAG FWA-managed lands and assist planners in more effective planning and resource management.

USAG FWA maintains active and accurate databases of all eligible and non-eligible properties on USAG FWA-managed lands. Information on archaeological sites is maintained in a GIS database, while historic buildings and structures are inventoried using an Access database. This information is also updated and stored in the State Historic Preservation Office's Alaska Heritage Resources Survey (AHRS) database.

Priorities for archaeological survey will be determined annually, based on available funding for Section 110 inventory, projected mission impacts, and proposed USAG FWA undertakings. Archaeological reconnaissance survey of areas with high cultural resources sensitivity and significant training impacts will receive priority. Given anticipated mission impacts over the next five years, some locations can be identified as probable areas for reconnaissance survey. Areas that have been previously surveyed, i.e., Birch Hill, Blair Lakes, and Clear Creek Buttes, will be resurveyed if the initial surveys were found to be incomplete or new evidence has surfaced.

Since 2006, USAG FWA has proactively surveyed all accessible buildings and structures known to be on the installation that are older than 40 years. Survey of historic buildings and structures within the Fort Wainwright cantonment is almost complete. As buildings and structures age and as USAG FWA staff accesses more remote locations, additional surveys will be needed. Already completed surveys will be reviewed and revised every five to ten years. The next review and revision is scheduled for FY 2015.

5.2.2 Minimize Harm to National Historic Landmarks

For projects that may affect the Ladd Field NHL, USAG FWA will consider the following alternatives:

- **Avoidance**: This project alternative provides for avoidance of adverse impacts altogether. This is accomplished by not proceeding with the project or that part of the project that will have the impact or by relocating or redesigning a project or features of a project to avoid impacts to historic properties.

- **Minimize Impact**: Minimize the unavoidable adverse impact by limiting the degree or magnitude of the action and its implementation. This alternative seeks to limit construction impacts to temporarily protect a resource until permanent treatments can be applied, and/or to control the impacts through monitoring and oversight.

- **Preserve, Rehabilitate, or Restore the Affected Environment**: This alternative allows for project redesign when involving historic properties, so that the Secretary of the Interior's *Standards for the Treatment of Historic Properties* are applied.

- **Monitoring During the Project**: Any preservation, maintenance or other measures implemented to minimize the effects of an undertaking on a historic building or structure will require ongoing monitoring to ensure the measures are effective. If it is observed that measures originally outlined are insufficient or not effective, or other unforeseen impacts occur, additional

preservation alternatives will need to be explored.

- **Adaptive Reuse:** Historic buildings and structures that are no longer needed or suitable for their original use will, to the extent feasible, be considered for an alternative use that would support other installation missions.

- **Ongoing Preservation and Maintenance**: Reduce or eliminate the cumulative impact of an undertaking through preservation and maintenance operations during the life of the action. Examples include securing historic buildings and structures from exposure to weather and protection of sites from disturbance and erosion.

- **Mothballing**: This alternative provides for sealing a historic building or structure from the elements to temporarily protect it from the weather and secure it from vandalism.

5.3 National Historic Preservation Act's Section 106 Procedures

5.3.1 Identifying Undertakings

An undertaking is a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of the Army, including those carried out by or on behalf of the Army, those carried out in whole or in part with Army funds, and those requiring Army approval. The Cultural Resources Section will evaluate all projects and actions planned for implementation on lands owned, managed, or utilized by USAG FWA to determine if they meet this definition of an undertaking.

Undertakings can be projects, work orders, contractor actions, permits, leases, and other activities as defined above and are generated through several different sources. Undertakings may originate with DPW, infrastructure maintenance contractors, military construction project proponents, and other entities. The majority of projects that have the potential to affect historic properties are generated either through work orders or Military Construction (MILCON) requests. Work orders tend to cover repair and maintenance needs under $750,000. MILCON projects tend to be new projects or major repair/maintenance actions over $750,000. Projects may also be generated by direct congressional appropriations for identified purposes.

In order to identify potential undertakings, the Cultural Resources Section will coordinate with project proponents, attend planning charettes, input into the Preconstruction Environmental Survey process and participate in the work order review process. Proponents of MILCON projects will coordinate with the Cultural Resources Section to review proposed actions. The Cultural Resources Section assists the proponents in meeting requirements of Section 106 of NHPA.

Undertakings of tenant-unit organizations are subject to the review process for Section 106. Undertakings conducted by or for USARAK tenant-unit organizations with funding appropriated for the tenant are the responsibility of the tenant; likewise, compliance with Section 106 is the responsibility of the tenant unless DPW has assumed that responsibility on their behalf. Additionally, all USAG FWA staff, infrastructure maintenance contractors, and MILCON project proponents intending to initiate or permit projects, activities, or programs on USAG FWA-managed lands will coordinate with the Cultural Resources Section to ensure the successful implementation of Section 106 responsibilities.

The Cultural Resources Section will use the information provided by the proponent to determine whether the project or activity qualifies as an undertaking and, if so, whether it has the potential to affect historic properties.

5.3.2 Streamlined Undertakings and Categorical Exclusions

After a project has been determined to be an undertaking, the Cultural Resources Section will determine if the undertaking has already been addressed through a nationwide Program Alternative or if the undertaking qualifies for the Streamlined Review Process set forth in the Operations and Maintenance Programmatic Agreement.

Program Alternatives

Many types of undertakings have already been addressed through a fully executed Program Alternative in accordance with 36 CFR § 800.14 of Section 106 regulations. Program Alternatives include, but are not limited to, both nationwide Program Alternatives and Program Comments. Presently, there is one nationwide Program Alternative and two Program Comments in place. These are:

- Program Comment for Capehart and Wherry Era (1949-1962) Army Family Housing. The Program Comment provides a one-time, Army-wide NHPA compliance action for all Capehart and Wherry Era housing for the following management actions: maintenance and repair, rehabilitation, layaway and mothballing, renovation, demolition; and transfer, sale, or lease from federal ownership.
- Program Comment for Cold War Era Unaccompanied Personnel Housing, World War II and Cold War Era Ammunition Storage Facilities and World War II and Cold War era Army Ammunition Production Facilities and Plants. Management actions covered by this Program Comments are ongoing operations, maintenance, and repair; rehabilitation; renovation; mothballing; cessation of maintenance, new construction, demolition; deconstruction and salvage; remediation activities; and transfer, sale, lease, and closure of such facilities.
- Nationwide PA addresses World War II temporary buildings. Provides for the demolition of World War II temporary buildings without further Section 106 consultation.

Operations and Maintenance Programmatic Agreement (O&M PA)

In 2010, USAG FWA entered into the O&M PA with the SHPO and NPS to streamline the review process for undertakings that have little to no potential to affect historic properties. For undertakings that meet the following criteria and therefore fall under the O&M PA, no further consultation is required unless otherwise specifically requested by the SHPO, Alaska Native tribes, ACHP, NPS, local governments, or other interested parties for the following undertakings.

The following undertakings qualify for the streamlined review because of the imminent threat to human health and safety:

- In-place destruction of unexploded ordnance.
- Destruction of ordnance in existing open burning/open detonation units.
- Emergency response to releases of potentially hazardous substances, pollutants, and contaminants.
- Projects within any operable unit or as designated by USAG FW's Restoration, Compliance, and Clean-up personnel and.

- Continued military use and operation of dudded impact areas, active firing ranges, and other designated surface danger zones that are in active use, not including change of level of use.

The following undertakings qualify for the streamlined review only if the individual undertakings: (1) do not include ground disturbance, (2) are sited in areas of recent previous ground disturbance as determined by a professional meeting *The Secretary of the Interior's Professional Standards* for archaeology, or (3) are sited in areas that have been surveyed by a professional *The Secretary of the Interior's Professional Standards* for archaeology and do not contain any identified National Register eligible historic properties. Any potential visual impact cannot alter the character-defining features of any historic property, especially the Ladd Field NHL and the Cold War Historic District.

- Expansion, replacement, maintenance, repair, or removal of post infrastructure including existing streets, trails, bike paths, parking areas, culverts, surface or buried linear infrastructure (including surface utility lines, transmission lines and other minor linear features such as fences) and any associated features such as curbs and drains with an APE sited outside of the Ladd Field NHL and Cold War Historic District.
- Additions, expansion, replacement, maintenance, repair, or removal of properties outside of the Ladd Field NHL and Cold War Historic District that are less than 45 years old, determined not eligible for the National Register, and do not visually impact a National Register eligible property.
- New construction within the cantonment area with an overall project area under five acres that will not have a visual impact to the setting of the Ladd Field NHL and/or Cold War Historic District.
- Introduction and use of new equipment such as vehicles.
- Repair or resurfacing of existing streets, trails, bike paths, parking areas, runways and associated features such as curbs and drains when using in-kind or visually similar materials with existing historic materials retained as much as possible.
- Expansion, replacement, maintenance, repair, or removal of existing surface or buried linear infrastructure, including surface utility lines, transmission lines and other minor linear features such as fences when using in-kind or visually similar materials with existing historic materials retained as much as possible.
- Installation, repair and replacement of head bolt outlets in existing parking lots.
- Installation of small scale, temporary and/or permanent environmental monitoring units and restoration operational units for the mitigation of hazardous materials.
- Standard operations within approved landfills.
- Standard operations within approved borrow pits.
- Placement of temporary signage to mark detours, safety hazards, and associated activities in areas.
- Routine lawn maintenance such as mowing, watering, and fertilizing.
- Routine removal of dead trees and trimming of overgrown trees and shrubs not to include removal of stumps in an undisturbed area.
- Replacement of trees and other shrubs with similar plantings.
- Planting new vegetation.
- Hazardous fuels management activities such as removal of downed limbs and vegetative matter and thinning tree stands outside of the Ladd Field NHL and Cold War Historic District using methods that do not impact extant historical and archaeological resources.
- Routine military training activities that do not include ground disturbance.

- Repainting buildings using the Installation Design Guidelines or using the same or very similar paint type and color.
- Installation of smoke detectors and fire/smoke sensing devices in a manner that is reversible and damages as little historic fabric as possible.
- Installation of monitoring devices and security measures, such as window bars and security lighting that is reversible and alters the property's historic fabric as little as possible.
- Installation of energy saving devices and measures, such as attic insulation, modern heating and cooling devices and duct work in a manner that is not externally visible.
- Removal of pests and material associated with their presence.

The following undertakings apply to historic properties only and focus on routine repairs and replacement of materials. This includes the small scale repair of roofs, siding, windows, porches, eyebrows, doors, stairs, decking, flooring, footings, foundations (repair only), retaining walls (repair only), gutters and other building components that are regularly maintained on a structure. All repairs and replacements have to conform to guidance found within *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. To use the Streamlined Review Process, no alterations to the historic properties' character-defining features are allowed. Specifics for the routine repair and replacement include:

- If the material is historic, the repair and replacement work has to be conducted using materials of the same type or visually similar to the materials being repaired. For example, the repair of a flat roof is to use the same or visually similar materials with the roof configuration remaining unchanged. If a window unit has deteriorated beyond repair, an identical window or one with a very similar appearance must be installed. For example, a double hung window has to be replaced by a window of similar configuration and coloring to the deteriorated window or with a design that is in keeping with the original window design for the property.
- Emphasis is placed on retaining, repairing, and preserving historic building components, with replacement used when the historic property has deteriorated beyond repair.
- Historic elements such as original plumbing, electrical, and mechanical systems found within historic properties are to be preserved as much as possible and practical, barring any safety or code issues, and should be repaired using modern materials analogous/similar to the historic materials and documented if they are beyond repair.
- Historic primary interior features of the historic properties are to be retained and;
- Expansion, replacement, maintenance, repair, or removal of interior features is included under the Streamlined Review Process if the features are not historic.

If the Cultural Resources Section determines that the undertaking has not been addressed by a nationwide Program Alternative, Program Comment, or the O&M PA, then it is subject to standard Section 106 review as described in Sections 5.3.3 through 5.3.7.

5.3.3 Defining the Area of Potential Effect

The Area of Potential Effect (APE) is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such historic properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. The size of the APE is determined on a case-by-case basis and includes in its calculation the scale and nature of the undertaking. The Cultural Resources Manager may consult with SHPO, tribes, and other consulting parties to provide expertise in the determination of the APE. Generally, the size of the APE will be commensurate with the size of the

project, encompassing both potential direct and indirect effects. Cumulative effects may also influence the final APE. Projects should also consider visual impacts.

To determine the project APE:

- Categorize the undertaking (repair and maintenance, ground-disturbing activity, etc.).
- Determine whether the effects typically associated with this category of undertaking are the expected effects for the project.
- Based on anticipated effects and where those effects might occur in relation to the project, define the APE.
- Complete this process for all potential project locations, if the project will have multiple locations.
- If applicable, include all APE definitions on a project map, including areas of direct and indirect effect.

5.3.4 Identifying Cultural Resources

The purpose of identification is to collect information about historic properties within an APE. After the resources in the APE are identified, they are evaluated for eligibility in the National Register. Not all resources qualify for inclusion in the National Register. National Register eligibility is a threshold that affects subsequent management actions for the resources. Properties do not have to be formally listed in the National Register to meet this threshold; they only need to be determined eligible for listing on the National Register.

Identification studies typically include background research, field investigations, consultation, analysis, and documentation of findings. Prior to a project-specific identification study, the Cultural Resources Section will conduct a pre-inventory analysis to determine whether additional investigation is necessary and, if so, what type of inventory approach is appropriate.

The Cultural Resources Section will review the project area to establish whether the APE has been previously inventoried and to determine what types of historic properties are likely to be found in the APE. Background research should be conducted in preparation for survey as appropriate to the project. Potential sources include, but are not limited to, installation files and maps, previous identification surveys, BLM files, AHRS maps and files at the Alaska Office of History and Archaeology, previously identified historic contexts for the region, local histories, and traditional tribal knowledge. Information may also be available from local governments, Alaska Native organizations and tribal governments, universities, and public and private groups and institutions. Resources for this review may also include, but are not limited to, the GIS inventory and maps of USAG FWA historic properties, USAG FWA planning level surveys, installation building inventories, and maps of archaeological sites, established historic districts, and the Ladd Field NHL. Preliminary analysis may also involve the application of archaeological predictive models and the consideration of any known Traditional Cultural Properties.

If the area has been investigated previously, the Cultural Resources Section will assess the quality of any collected data. If the area has not been investigated or if the quality of previously obtained data is poor or outdated, further identification efforts will be required. The Cultural Resources Section will determine the need for additional identification based on planning level survey data and/or predictive model results and preliminary tribal consultation on potential traditional cultural properties. If additional identification studies are required, the appropriate tasks may include additional background research, field investigation, tribal consultation, analysis, and report preparation. The SHPO, NPS, Alaska Native tribes,

and other consulting parties may also be consulted and participate in the identification and evaluation of historic properties.

Cultural resources surveys include archaeological sites; historic buildings and structures; and properties of traditional, religious and cultural importance. Each has specific requirements and guidelines. In general, there are two types of surveys: the reconnaissance survey and the intensive survey. The reconnaissance survey is a light inspection aimed at developing a general overview of an area's resources. The primary reason for a reconnaissance survey is to support background research in preparation for an intensive survey. The objective of an intensive survey is to, as much as possible, identify completely and precisely all properties in a specified area based on a specific research design. It involves background research and a thorough inspection and documentation of all historic properties in an area. It should provide an inventory and necessary information to evaluate properties for the National Register. Methods for conducting historic and archaeological surveys differ. Standards and guidelines for each may be found in *The Secretary of the Interior's Standards for Identification* and in *Guidelines for Local Surveys: A Basis for Preservation Planning*. Further information on conducting surveys can be found in Section 4.9, Archaeological Survey and Excavation Methods.

As part of the research process, NPS and AEC should be contacted periodically to determine whether any nationwide historic contexts have been developed that might apply to historic properties on Fort Wainwright. Similarly, SHPO may have a statewide context against which the historic relevance of a resource can be weighed. USAG FWA has been proactive in developing historic contexts for resources on its installation that are specific to the history of the region and to the military in Alaska. This effort to address gaps in the literature for current and future reference should continue.

AHRS site forms will be completed and turned in to the Office of History and Archaeology for each identified cultural resource. AHRS is a database of all known historic and archaeological sites in Alaska, regardless of National Register eligibility. In cases of militarily sensitive properties, photos and maps may be subject to internal review and restriction.

If no historic properties are identified and following consultation with the SHPO and other consulting parties, the project can proceed. If historic properties are identified in the APE, the Cultural Resources Section will evaluate resources for eligibility for the National Register.

5.3.5 Evaluating Eligibility

Evaluation for eligibility is a process based on established criteria and guidance developed by the National Register Program. The process relies on two key concepts: significance and integrity. Both of these criteria must be met and demonstrated to establish National Register eligibility. Understanding the historic context of a property allows reasonable judgments to be made about those thresholds. Because significance and integrity are subjective concepts, the National Register has developed criteria for evaluation and definitions of aspects of integrity. These are provided in 36 CFR § 60.4 and summarized in Appendix 2. While the same National Register framework is used to evaluate historic properties, archaeological resources, and properties of traditional religious and cultural importance, evaluations will emphasize the aspects appropriate to the type of resource under consideration.

To evaluate eligibility, first the property's' *significance*, or lack thereof, must be understood. To achieve this, the Cultural Resources Section will utilize existing historic contexts or develop new contexts based on sound research and following T*he Secretary of the Interior's Standards for Preservation Planning*.

Once, the *significance* is understood, the National Register criteria for evaluation of eligibility for inclusion in the National Register will be applied in evaluating cultural resources. If the cultural resource meets one or more of these criteria of significance and retains integrity, it is eligible for the National Register. If the resource does not meet any of the criteria or does not retain integrity, it is determined to be not eligible for the National Register.

National Register Criteria for Evaluation:

Criteria: The quality of *significance* in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- Are associated with events that have made a significant contribution to the broad patterns of our history;
- Are associated with the lives of persons significant in our past;
- Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction: or
- Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to significance, a cultural resource must possess *integrity* to be eligible for the National Register. Integrity is the ability of the resource to convey its significance, to reveal to the viewer the reason for its inclusion in the National Register. Integrity must be judged based on how the cultural resource's physical features relate to its significance. Seven aspects are used to define integrity: location, design, setting, materials, workmanship, feeling, and association. Most, if not all, of the aspects of integrity should be present for the resource to retain its historic integrity. These concepts are defined in more detail in Appendix B.

If a cultural resource meets one or more of the four Criteria for Evaluation, integrity must be evaluated. If the cultural resource retains integrity, proceed with the evaluation. If the resource does not meet any of the criteria or does not retain integrity, it is determined to not be eligible for the National Register.

Lastly, the Cultural Resources staff will determine if the cultural resource represents a type usually excluded from the National Register and, if so, meets any of the Criteria Considerations. Properties normally excluded from National Register eligibility include religious properties, properties that have been moved, birthplaces, graves and cemeteries, reconstructed properties, and properties less than 50 years old. However, exceptions can be made for these kinds of properties if they meet four National Register Criteria for Evaluation, fall under one of the seven special Criteria Considerations, and retain integrity.

As discussed previously, it may not be necessary or appropriate to specifically identify and evaluate all properties of traditional religious and cultural importance for inclusion in the National Register. However, when this is determined to be an appropriate measure, the identification, evaluation, and management of properties of traditional religious and cultural importance require tribal consultation and participation.

A traditional cultural property is defined in National Register Bulletin 38 as a site "eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." Besides meeting these requirements, a traditional cultural property must also meet one or more of the four National Register Criteria for Eligibility and retain integrity. The

statement of significance describing eligibility will be based on traditional knowledge, literature reviews and archival records. Integrity is best determined by the tribe recognizing the site's significance.

If the SHPO does not agree with USAG FWA's finding of eligibility and USAG FWA and the SHPO are unable to reach concurrence through future consultation, the DOE will be forwarded on to the Keeper of the National Register for a final determination.

5.3.6 Assessing Effects

This section provides for the consideration of the effects of a project on historic properties. If historic properties are present within a project's APE, it must be determined if the undertaking will affect those properties. *Effect* is defined as an alteration to the characteristics of a cultural resource that qualify it for listing in or eligibility for listing in the National Register. Determinations of effect will be made by the Cultural Resources staff with final determinations reviewed by the Cultural Resources Manager.

There are three possible determinations listed below.

No Historic Properties Affected: This determination is made when there are no historic properties present within the undertaking's APE or they are present but will not be affected by the undertaking.

Finding of No Adverse Effect (aka No Historic Properties Adversely Affected): This determination is made when there may be an effect, but the effect will not be harmful to those characteristics that qualify the property for inclusion in the National Register.

Finding of Adverse Effect (aka Historic Properties Adversely Affected): This determination is made when there may be an effect and that effect could diminish the integrity of the characteristics that qualify the property for the National Register.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a cultural resource that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration will be given to all qualifying characteristics of a cultural resource, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative. Adverse effects on historic properties include, but are not limited to:

- Physical destruction of or damage to all or part of the property.
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with *The Secretary's Standards for the Treatment of Historic Properties* and applicable guidelines.
- Removal of property from its historic location.
- Change of the character of the property's use or physical features within the property's setting that contributes to its historic significance.
- Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural importance to Alaska Native tribes.

- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

5.3.7 Treatment of Adverse Effects

If USAG FWA determines that an undertaking will adversely affect a historic property, USAG FWA will enter into an agreement in the form of a MOA or PA with interested parties, which include, but are not limited to, SHPO, ACHP, Alaska Native tribes, local governments, and other consulting parties as appropriate. The purpose of this type of agreement is to avoid, minimize, and mitigate the adverse effects of an undertaking on historic properties. One note: if avoidance is achieved early enough in the process and there are no other adverse effects, then there may be no need for a MOA or PA.

Archaeological Sites and Traditional Cultural Properties

For projects that may affect archaeological sites and Traditional Cultural Properties, USAG FWA will consider the following approaches:

Avoidance: In many instances, projects proposed for areas containing sites that are eligible or potentially eligible for the National Register can be changed to avoid impacts. Avoidance is most easily arranged during planning stages when an area is being chosen for a project. Siting of projects in areas not containing significant resources can often be achieved with little adjustment or delay in the planning process. Even large-scale projects, such as building and road construction, can often be planned to avoid archaeologically and culturally sensitive areas.

Sometimes undertakings cannot be planned or redesigned to avoid areas containing sites. In these instances, it is often possible to protect sites from adverse impacts by physically placing them off-limits. Barriers, markers, signs, and fencing may be used to protect sites from adverse effects and may include educational panels explaining legal implications for disturbing the site. Physical obstructions, combined with verbal instruction and/or special contractual obligations, are usually sufficient to protect sites from activities and inadvertent damage. The marking-off of areas, however, has the disadvantage of potentially alerting the public to the presence of significant resources. If protection is only necessary during construction activities and future use of the project area will not include any impacts to the historic property, temporary protection measures or archaeological or tribal monitoring during construction may be appropriate. The monitor would be in place to ensure that no inadvertent damage was inflicted to a property during construction activities and would also be available for unanticipated discoveries.

Minimization: In cases involving large archaeological sites, it may be possible to protect only a portion of the site. The area chosen for protection must either be a "valid sample" representative of the site or, if possible, a definable area upon which the site's significance rests. Given these conditions, a portion of the site may be placed off-limits through the use of barriers, markers, or other such measures designed not to bring attention to the archaeological site. This kind of treatment may also be appropriate for properties of traditional religious and cultural significance as well. Avoidance and minimization options should be discussed and coordinated with Alaska Native tribes that have an interest in the area. Plans may be arranged ahead of time for known situations and conditions and even for specific sites.

Physical protection of an archaeological site or Traditional Cultural Property requires periodic monitoring to assess the effectiveness of implementation. Any measure being implemented to protect such sites would need to be monitored on a continual basis to ensure the protective measure is effective. If it is suspected that written or verbal instruction is being ignored, or that markers or barriers placed around the

site are insufficient, other strategies will be explored and implemented to ensure protection. Periodic monitor partnering and tours of certain sites would include interested Alaska Native tribes. Such monitoring would be scheduled in advance and may occur on a routine basis.

Mitigation: Mitigation for archaeological sites has traditionally focused around data recovery or excavation of the site, in order to record and preserve the information and material contained in the site prior to the occurrence of impacts. However, excavation and data recovery is not the only mitigation option for archaeological sites. Possible mitigation strategies include any one or combination of the following:

- Data recovery through excavation.
- Off-site mitigation at a different archaeological site than the one to be impacted.
- Sampling the portion of the eligible site that will be impacted and which needs to be mitigated, (for large scale projects) and protection of the remainder.
- Public interpretation.
- There are a number of other options (creative mitigation).

If only a portion of a site will be impacted, partial excavation, in combination with other protective measures, may be appropriate. Creative mitigation, including public interpretation, may be used as a sole mitigation measure in some circumstances or in combination with other mitigation measures. Mitigation at a site other than the one to be impacted by a particular project may also be a viable alternative in certain situations.

Mitigation in the form of data recovery is implemented as a last resort when an archaeological site or a portion of a site cannot be avoided or physically protected from undertakings. Data recovery consists of excavation and documentation, analysis, and reporting. Requirements for documentation are set forth in *The Secretary of the Interior's Standards and Guidelines: Archaeology and Historic Preservation*, and USAG FWA's minimum standards and methodology are discussed in Section 4.9, Archaeological Survey and Excavation Methods.

Artifacts recovered during excavation must be curated in accordance with standards established by the Secretary of the Interior and per 36 CFR 79. Products produced as a result of mitigation will be made available to interested parties, tribes, and the general public. Products provided for the general public will not contain information that identifies site locations.

USAG FWA acknowledges that the affected groups (such as Alaska Native tribes) are the experts as to the type and extent of adverse effect a particular activity may have on a cultural significant site. Therefore, if the property needing mitigation is a Traditional Cultural Property and is eligible for the National Register, USAG FWA will consult with the appropriate parties to identify suitable mitigation measures. USAG FWA will, to the extent practicable, provide protection of and appropriate level of access to culturally significant sites in accordance with EO 13007, *Sacred Sites*.

Historic Buildings, Structures, and Objects

For undertakings that may affect historic buildings, structures, and objects, USAG FWA will consider the following alternatives:

Avoidance: This option provides for avoidance of adverse effects altogether. This is accomplished by not proceeding with the undertaking or that part of the undertaking that will have the impact or by relocating or redesigning an undertaking or features of an undertaking to avoid effects to historic properties.

Minimization: This option provides for minimization of an unavoidable adverse effect by limiting the degree or magnitude of the action and its implementation. This approach seeks to limit construction impacts to temporarily protect a historic property until permanent treatments can be applied, and/or to control the impacts through monitoring and oversight. The following are some examples of minimization:

- Adaptive Reuse: Historic buildings and structures that are no longer needed or suitable for their original use will, to the extent feasible, be adaptively reused to support other installation missions.
- Effects can be minimized by investing in preservation and maintenance of the affected historic property. Examples include securing historic buildings and structures from exposure to weather and protection of sites from disturbance and erosion.
- Mothballing provides for sealing a historic building or structure from the elements to temporarily protect it from the weather and secure it from vandalism.
- Minimization by design is also an option.

Any preservation, maintenance or other measures implemented to minimize the effects of an undertaking on a historic building or structure will require ongoing monitoring to ensure the measures are effective. If it is observed that measures originally outlined are insufficient, not effective, or other unforeseen impacts occur, additional preservation alternatives will need to be explored.

Mitigation: When the undertaking consists of demolition or substantial alteration, mitigation to a historic property may take the form of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation as general guidance. Additional mitigation measures may include: salvage, educational materials, interpretation, relocation, training or other appropriate actions. In consultation with the SHPO and other interested parties, the Cultural Resources Section will determine the type and amount of mitigation to be carried out based on the significance and character-defining elements of the property.

Mitigation includes documentation of historic buildings, structures, or objects, as set forth by *The Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. HABS/HAER Standards is comprised of several products, including measured drawings, large format photographs and written data. HABS documentation may be conducted on four levels. Each of the products must conform to four standards regarding their content, quality, materials, and preservation. Within each standard, there are varying levels of documentation, each applicable to the nature and significance of the historic property as well as to the reason for documentation. HABS Level IV or III documentation is generally used for inventories, while HABS Level I and II documentation is often used for mitigation. In consultation with the SHPO and other interested parties, the Cultural Resources Manager will determine the level of documentation commensurate with the significance of the historic property in question.

Following HABS Level II Standards as general guidance, architectural recordation will consist of "as-built" drawings (Mylar copies), 35-mm black and white photographs of general setting of building, exterior elevations of the building and all architectural elements that defines the building's architecture, and development of an architectural recordation form. Because of the precise and professional nature of HABS documentation, a qualified professional must carry out all such documentation. Architectural

documentation will be provided to the SHPO and will be maintained in USAG FWA files. USAG FWA will retain prepared documents and maintain a permanent record of what has been performed. Mitigation records will be made available upon request.

5.4 Procedures for the National Historic Landmark

USAG FWA currently has one historic property that is a National Historic Landmark: the Ladd Field National Historic Landmark (NHL). NHPA Section 110(f) requires USAG FWA to undertake planning and actions to minimize harm to NHLs and provide reasonable opportunity for the ACHP to comment on undertakings that directly and adversely affect NHLs. Use and appropriate maintenance of the buildings, structures, and cultural landscape of the NHL, as required by NHPA Section 110(a) (1), will ensure proper management of the NHL. Maintenance of contributing resources of the NHL must be carried out in accordance with *The Secretary of the Interior's Guidelines for Treatment of Historic Properties* and *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. USAG FWA management goals include completing a building assessment for one contributing resource of the Ladd Field NHL annually and coordinating planning and actions to minimize harm to the Ladd Field NHL, which has 20 contributing properties.

When an undertaking affecting the NHL requires consultation, USAG FWA will notify the NPS and invite the NPS to participate in the consultation where there may be an adverse effect per 36 CFR 800.10(c).

5.5 Development of Educational Materials and Interpretation

Educational materials, interpretation, and public outreach efforts should follow these guidelines listed below when used as mitigation:

- Be accessible to multiple audiences;
- Demonstrate relevance to Soldiers and dependents as the first-line installation caretakers;
- Be developed in partnership with Alaska Native tribes and other interested parties;
- Have mechanisms for feedback and an identifiable and consistent point of contact and;
- Be reasonably durable and not ephemeral (though ephemeral products, such as a public display of artifact collections, may be included as part of the final mitigation package).

All educational materials and public outreach efforts are to be coordinated with the USAG FWA's Public Affairs Office.

5.6 Post Review and Unanticipated Discoveries

In the course of conducting approved activities, the USAG FWA and/or its contractors shall not intentionally or knowingly affect (such as remove, disturb, or cause to be removed or disturbed) any historic properties outside the approved scope of work.

In the event that a previously unidentified archaeological site is discovered during the execution of an undertaking, all ground disturbing activity shall immediately cease in the area of the discovery until the USAG FWA archaeologist or other USAG FWA personnel who meet *The Secretary of the Interior's Professional Qualification Standards for Archeologists* can evaluate the archaeological site. Construction work may continue in the project area outside the archaeological resource area. USAG FWA shall notify

the SHPO and appropriate Alaska Native tribes within three business days of discovery. USAG FWA shall ensure that any archaeological work that may be necessary shall be completed in accordance with the NHPA and the ARPA. The SHPO and/or the Alaska Native tribes, if they so request, may immediately inspect the work site to determine the nature and area of the affected archaeological site. Within 10 business days of the original notification of the discovery, USAG FWA, in consultation with the SHPO and interested Alaska Native tribes, will determine the National Register eligibility of the resource and will propose action to resolve possible adverse effects to any affected National Register eligible archaeological sites. Work may resume in affected areas after approval by USAG FWA Cultural Resources Manager and the SHPO.

If human remains are inadvertently discovered; USAG FWA shall notify the SHPO within 24 hours of discovery. USAG FWA shall cease all work by its contractors and ensure that the remains are secured from further disturbance or vandalism until after the appropriate law enforcement authorities have determined that the remains are not related to any crime, and until a plan for treatment has been developed. If USAG FWA determines that the remains are Native American, the Garrison Commander shall immediately undertake any actions necessary under the Native American Graves Protection and Repatriation Act, as amended. If USAG FWA determines that the remains are not Native American, and do not warrant criminal investigation, USAG FWA shall immediately notify the SHPO and consult with the SHPO to identify descendants or other interested parties, if any. USAG FWA, in consultation with the SHPO and any interested parties, shall develop a plan for the respectful treatment and disposition of the remains. Work may resume in affected areas after approval by USAG FWA Cultural Resources Manager and the SHPO.

If during the course of an undertaking there are any unforeseen or unanticipated effects to historic properties other than the identification of a previously unknown archaeological site, USAG FWA shall initiate consultation pursuant to 36 C.F.R. § 800.13(b)(3) to resolve the unforeseen effects.

5.7 Emergency Actions

There may be times that USAG FWA must respond to disasters or emergencies that affect the operations and missions of the installations. These emergencies can be both natural or in response to situations that result from human events. This may also include those actions necessary to respond to a threat to national security, including short-term, mission-essential activities for deployable troops.

Activities and actions undertaken to respond to disasters and emergencies can have an adverse effect on historic properties located on the installations. There may be instances where known historic properties will be affected or where unidentified historic properties will be affected by activities taking place in areas of the installation that have not been previously inventoried. As with inadvertent discoveries, emergency actions require an expedited process for handling historic properties that may be affected by emergency action.

Within 48 hours of the formal disaster or emergency declaration by the Garrison Commander and pursuant to 36 CFR 800.12, the Cultural Resources Manager will determine the necessary course of action to minimize damage to potential and known historic properties and the potential for salvage of any cultural resource data. Appropriate consulting parties, including the SHPO and ACHP, will be notified of USAG FWA's actions. Documentation of emergencies will occur for the subject undertaking.

If the Cultural Resources Manager determines data recovery and/or recordation is necessary, it will include, but not be limited to, any of the following:

- Where subsurface disturbance over an area that has not been inventoried has occurred, either as a result of the disaster or the cleanup effort, archaeological inventory of all exposed surfaces will occur.
- If known archaeological site(s) or properties of traditional religious and cultural importance are damaged, but the damage is minor, protective strategies designed to prevent further site degradation will take place.
- In the event that the damage to an archaeological site(s) or culturally significant site is severe and the site was or may have been eligible for the National Register, a report will be prepared documenting the damage and the potential for salvage of values that cannot otherwise be conserved. Notification and consultation with appropriate Alaska Native tribes may be needed to determine if artifacts encountered are funerary objects, objects of cultural patrimony, or human remains pursuant to NAGPRA. If the potential for salvage is high, a research design will be prepared and salvage will proceed when normalcy is restored. If it can be documented that there is little or no potential for salvage, the damage will be documented in photographs, artifacts at the site will be collected and documented, an updated DOE will be completed, and no further site investigation will take place.
- If demolition or disposal of a National Register-listed or eligible building, structure, or object is necessary due to life safety issues as the result of a disaster or emergency, recordation will be limited to photographs of all exterior surfaces and features. Only those interior features that may be safely accessed may be documented with photographs.
- If a National Register-eligible or listed building, structure, or object is damaged, initial repair will be limited to stabilization and protection from further damage. Rehabilitation will be undertaken at a later date when normalcy is restored and subject to availability of funds.
- If known properties of traditional religious and cultural importance are damaged, consultation on treatment will be coordinated with Alaska Native tribes. If in the future any such properties are known by USAG FWA, an emergency contact list for each presently known site will be maintained by USAG FWA.

5.8 Archaeological Survey and Excavation Methods

This section describes the minimum standards and methodology for archaeological surveys and excavations conducted on USAG FWA-managed lands.

5.8.1 Principal Investigator Qualifications

The Cultural Resources Manager will ensure that the principal investigator of archaeological surveys or excavations conducted on USAG FWA-managed lands will meet the qualifications mandated in 36 CFR § 61:

- M.A. /M.S. or Ph.D. in Archaeology or Anthropology or closely related field.
- At least one year full-time professional experience or equivalent specialized training in archaeological administration or management.
- At least four months of supervised field and analytic experience in general North American archaeology.
- Demonstrated ability to carry research to completion.
- At least one year of full-time experience at a supervisory level in the study of archaeological resources of the prehistoric or historic periods.

5.8.2 Archaeological Survey and Excavation: Minimum Standards

Survey and excavation requirements will vary depending on the scope and character of the undertaking. Final survey area will be based on the APE, project needs, established minimum methodology (see below), and exempted areas.

Background Research

The investigator will conduct a thorough literature review and site file search prior to initiating fieldwork. This research will include the environmental, archaeological, and historical background of the region. It will aim to identify potential data gaps and also take into account local settlement patterns, resource availability, resource exploitation, and temporal or cultural affiliations. The Cultural Resources Manager or principal investigator will then formulate a research design based on the background research, size of the APE, potential undertakings in the area, and terrain conditions.

Phase 1 Investigation

Phase 1 investigations attempt to locate archaeological resources within the project APE. After the boundaries of the APE are established, a pedestrian survey will cover 100% of the area with transects spaced at 20-m intervals. Shovel testing will be placed systematically on a metric grid at a minimum of 20-m intervals in high probability areas (uplands, river bluffs, shorelines, and areas near attractive resources or raw materials). Shovel test pits will not be excavated when slope gradients exceed 30%, the ground surface is flooded or waterlogged, or landscapes are extensively disturbed. Shovel test pits should be a minimum of 50 x 50 cm in diameter and excavated to bedrock or permafrost. All excavated sediments should pass through ¼ inch mesh hardware cloth. When historic buildings and structures greater than 50 years old are encountered, shovel tests should be placed around the perimeter of each structure to identify historic archaeological deposits.

USAG FWA has a minimal collection policy. Only artifacts excavated in shovel test pits or tools found on the surface will be collected. All waste flakes and construction debris from features should be left on site.

Recorded information during a Phase 1 investigation should include: photo documentation; site, test pit, and artifact mapping; and test pit and site descriptions. Photographic documentation should include the vegetation and terrain of the APE. Site locations, test pit locations, and areas where test pits were not excavated should all be photographed. Maps of site landforms, test pit number and location, and surface finds should be created to define the horizontal limits of the site, determine sample size, and facilitate identification of areas of moderate and high artifact densities. Surface distribution of artifacts will guide the location of test units for Phase 2 investigations. Test pit records should include location, size, and depth. Sediment descriptions with profile drawings and Munsell colors are required for all shovel test pits.

Phase 2 Investigation

If data generated during a Phase 1 investigation clearly documents the absence of cultural material or if all sites can be easily avoided by any undertakings, a Phase 2 investigation is not necessarily conducted. Phase 2 investigations are equivalent to DOEs for inclusion in the National Register. The criteria for evaluation are found in 36 CFR § 60. As in Phase 1 investigations, DOEs should limit artifact collection to surface tools and all subsurface materials that were excavated.

Phase 2 investigations aim to define site significance and boundaries without seriously impacting the integrity of the site. A DOE requires a physical description of the site and an evaluation of site condition and significance. It includes relevant sources, site maps, and photographs. In a Phase 2 evaluation, the following documentation should be included:

- Vertical and horizontal site limits as defined by maps of surface scatters, shovel tests, and/or auger holes;
- Site sediment descriptions and stratigraphic profiles from test units;
- Site structure;
- Site formation and post depositional transformation processes;
- Relative or absolute temporal information;
- Artifact and feature spatial data; and
- Other relevant data.

Included in a DOE evaluation is a discussion of the cultural chronology of the site based on radiocarbon dates or relative dating methods and the cultural history of the region. The significance of the site at local, state, and even national levels is assessed and finally, a DOE for the National Register is made in consultation with the SHPO.

Phase 3 Investigation

A Phase 3 investigation aims to mitigate adverse effects through data collection (usually in the context of the NHPA's Section 106 process) prior to any disturbance of the site that is eligible for or listed on the National Register.

Phase 3 investigations occur only after developing an MOA with the SHPO.

To begin a Phase 3 investigation, a recovery plan must be submitted to the SHPO and will include background research, previous investigations, Phase 2 research descriptions, a justification of the DOE, and a proposal of fieldwork and mitigation to be conducted. If the Phase 3 data recovery plan includes excavation of all or part of the site, the excavation will follow the minimum methods listed below.

Excavation Methodology

Excavation methodology will be tailored to the specific site and any conditions set by the MOA. In general, first a sampling strategy that covers at least 20% of the archaeological site will be defined. In many cases, complete excavation of the site will be possible. The percentage of site recovery will depend on the degree of disturbance and the size of the archaeological site.
Site stratigraphy and artifact concentration (surface or subsurface) should guide the placement of excavation units. Block excavations over artifact concentrations will be used to maximize data recovery and excavate the largest percentage of the site possible. Low density areas will also be tested with single excavation units, especially where deposits are buried.

Excavations will proceed by shovel or trowel scraping, depending on artifact density. A combination approach using skim shoveling to remove sterile strata and hand trowelling when artifacts are uncovered should be used for efficiency. A total station will be used to record the 3-point provenience of all datums, tools, and flakes with densities less than 20 per 50-cm quadrant per 5-cm level. Quadrant and 5-cm level mapping and bagging of flakes in excavation units is the preferred method of data recovery for efficiency in fieldwork, storage, and analysis. The locations of artifact clusters should be mapped in notebooks using

the total station. Features (e.g., postmold, hearth, storage pit, etc.) should be mapped on the site grid system, drawn in plain view, and photographed. After mapping, the feature should be bisected and one half excavated in 5-cm levels. Additional samples (e.g., charcoal, macrofossils, phytolithcs, pollen, soil, and block sediments for micromorphology) will be collected as available and according to research questions. All back dirt should be screened through ¼ inch or finer mesh.

Documentation

Results of archaeological surveys and excavations will be documented for inclusion in 106 letters and NHPA reports, inclusion in the Administrative Record and submissions to agencies as necessary. Level of documentation should be appropriate to the results and findings and may include:

- Methodology;
- APE, survey, and excavation area descriptions;
- Description of sites identified, including DOEs;
- Copies of AHRS forms;
- Photos of resources and project areas;
- Maps of the survey area and inventoried archaeological sites in a format compatible with ArcInfo/ArcView;
- References or sources;
- Site boundaries, artifact and feature locations (from GPS on survey, Trimble GPS during phase 2 investigations, and from total station during excavation);
- Artifact densities and feature locations;
- Artifact and faunal analyses; and
- Sediment, charcoal, pollen or other data analyses.

5.9 Paleontological Resources

Paleontological resources (as defined in the Paleontological Resources Preservation Act, P.L. 111-011(d) Sec 6301), are any fossilized remains, traces or imprints of organisms preserved in or on the earth's crust that are of paleontological interest and that provide information about the history of life on earth (not including archaeological resources). It is possible that paleontological resources will be encountered during management, recreation, or military activities on Army lands. At present, there are no known fossil beds on Fort Wainwright or in the surrounding Army training lands. Pleistocene fossils are known from the deep loess beds capping much of Fairbanks and the vicinity.

5.9.1 Responsibility

Although the Paleontological Resources Preservation Act is only applicable to DOI and Forest Service lands, Army Regulation 200-1 of 2007 states that paleontological resources must be addressed for impact or loss in any NEPA documentation. This regulation also requires managing documents for cultural resources to include a policy for management and limitation of collection of paleontological resources. It is therefore the responsibility of the Garrison Commander and Cultural Resources Manager that paleontological resources found in Army lands are identified, inventoried, protected, and curated.

5.9.2 Procedures

Paleontological resources will be sought by the Cultural Resources Manager in conjunction with standard archaeological surveys, inventories, and Section 106 procedures. If any individual fossils or fossil sites

are discovered, the Cultural Resources Manager will consult with a qualified paleontologist from the University of Alaska Museum of the North. Curation of paleontological resources is covered by existing MOAs with the University of Alaska Museum of the North.

Federal regulations limit collection of paleontological resources on BLM and Forest Service lands to casual surface collection of common invertebrate and plant fossils for personal use. Permits for broader collection or excavation of paleontological resources are the responsibility of BLM. Any misuse or destruction of paleontological sites or resources will be brought to the attention of the BLM by the Cultural Resources Manager.

5.10 Maintenance Plan for Historic Buildings

The Cultural Resource Section is dedicated to promoting the management of USAG FWA's historic buildings through proactive and effective stewardship. This proactive approach assists in the reduction of operating costs for historic buildings and ensures that all applicable regulatory laws and regulations are adhered to. The Cultural Resource Section plans to enhance current stewardship activities through the development and implementation of a maintenance plan that will support the treatment, maintenance, and repair of historic buildings located within the Ladd Field NHL and the Cold War Historic District) Preserving the integrity of individual buildings during maintenance, repair, and rehabilitation projects is essential to the integrity of both of Fort Wainwright's historic districts and the primary purpose of the Cultural Resource Section. The purpose of this plan is to detail measures currently being utilized by the Cultural Resource Section to monitor the maintenance, repair, and rehabilitation needs of USAG FWA's historic buildings and to establish future goals that will facilitate early identification and funding for their preservation and maintenance.

The following is a list of current procedures and future goals for the Cultural Resources Section to manage maintenance needs for Fort Wainwright's historic buildings.

- Utilization of existing professional staff.
- Recordation of historic buildings, historic documentation, and in-depth building studies.
- Review of project requests.
- Monitoring of project development and execution.
- Assessment of maintenance needs of historic buildings.
- Conduct periodic inspections of historic buildings.
- Submit work orders as needed and integrate information into the post community and large-scale planning documents.

5.10.1 Current Maintenance Procedures

Many different types and levels of undertakings can affect a building's architectural character and appearance, from replacement of deteriorated building elements to the rehabilitation and adaptive reuse of an entire building. Changes that are not done in a sympathetic manner can negatively impact, not only the historic building itself, but surrounding historic buildings or districts. To aid federal agencies in making sensitive changes to historic buildings, the National Park Service has developed *The Secretary of Interior's Standards for the Treatment of Historic Properties*, which describes the accepted standards for the preservation, rehabilitation, restoration, and reconstruction of historic buildings. Cultural Resource Section staff utilizes these standards when reviewing projects that require the repair or maintenance of a historic building. Along with the accepted standards, the Cultural Resources Section utilized a

professionally trained staff, historic documentation, in-depth building reports, and an established project review process to help maintain the historic buildings on Fort Wainwright.

Staff Qualifications

The Cultural Resource Section is comprised of a full-time staff that has the education, background, and professional experience needed to effectively monitor and advocate for Fort Wainwright's historic building maintenance needs.

Building Recordation and Studies

The Cultural Resource Section frequently utilizes historic photographs, early site plans and maps, original drawings, future project planning maps, installation and NHL design guidelines, as well as real property records to identify historic properties and evaluate their significance. The review of these documents aids the Cultural Resource Section by providing knowledge of original materials used in the construction of USAG FWA's historic buildings and in deciding what materials are appropriate for repair or rehabilitation projects. Old photographs and site plans also aid in documenting sites that no longer exist and can be used to identify current or potential environmental problems for areas being considered for future development projects.

Additionally, as buildings become 50 years old, new surveys and Determinations of Eligibility (DOE) are conducted. As of the 2012 summer field season, the majority of all USAG FWA's buildings 40 years or older were surveyed and DOEs completed.

In addition to routine surveys and DOEs, there have been a number of in-depth studies conducted on several of Fort Wainwright's historically significant buildings and the development of a set of design guidelines for projects within the NHL to aid in future planning and development decisions. A few of the in-depth studies conducted including the Condition Assessment Rehabilitation Plans for Hangars 2 (3008) and 3 (3005), the North Chapel Historical Building Stabilization, and Historic American Buildings Surveys for several buildings. A more complete list of the documents and historic contexts can be found in Section 3.4.1 of the ICRMP.

Project Reviews

For compliance purposes, all work on USAG FWA's land is informally and/or formally reviewed to monitor current conditions and to determine if there is the potential to affect historic properties. Informal reviews involve consultations with engineers, architects, facilities maintenance, and other staff via phone, in-person, and/or email conversations. Formal reviews include, but are not limited to, work orders, and NEPA documentation, as well as pre-design and planning meetings. Work orders are the most frequently utilized type of project review completed by the Cultural Resource Section.

Work orders are standardized forms that are required when a building manager or DPW personnel is requesting maintenance or repair of any infrastructure on USAG FWA. During the environmental review of the work order, the Cultural Resource Section reviews the request and determines if there is a potential to affect any historic buildings. If there is, then the Cultural Resources Section adds information to the work order, including possible ways to avoid, minimize, and/or mitigate the effects. Additionally, the Cultural Resource Section contacts the proponent of the request and the project manager, if one has been assigned, to discuss the scope of work and its impacts to any historic buildings.

Early consultation with all parties involved in the project is essential to ensure adequate time to facilitate the Section 106 consultation. Many work orders reviewed by the Cultural Resources Section are for standard maintenance or repair work that is an integral part of maintaining the installation's infrastructure. Most of the time, these projects have no adverse effects to historic buildings. At this point in the work order review process, the Cultural Resources Section determines if the proposed work has been addressed through a nationwide Program Alternative or if it qualifies for a streamlined review process set forth in the O&M PA.

If the Cultural Resources Section finds that an undertaking has the potential to affect a historic property which cannot be addressed by an existing Programmatic Agreement or the O&M PA, then Section 106 consultation is initiated with the SHPO and all interested consulting parties. Usually the consultation begins with informal phone conversations with consulting parties as well as the drafting of the initial Section 106 correspondence.

Even when a project is initially determined to have no potential to affect historic buildings or is addressed by the O&M PA, it is still critical to follow up on these projects and monitor their progress. To properly monitor a project's progress, follow-up with project managers and additional review of any changes to a project's scope of work is required. Projects can take up to several years to get funded and in that time may be altered or combined with other work orders. The Cultural Resources Section reviews the 1-n[85] list to verify which projects have been approved for the current fiscal year and the priority listing of the projects.

5.10.2 Future Plans for Maintenance of Historic Buildings

To aid in the collection of relevant data regarding historic buildings on Fort Wainwright, the recordation of their current condition and any possible future repairs will serve as a useful tool for the Cultural Resource Section to make informed decisions regarding future management and in the understanding of how new projects will impact the historic fabric of the building. To record this data, the development of building assessments and historic building maintenance inspections by a historic architect will be utilized to determine a baseline of current historic building conditions within the Ladd Field NHL and Cold War Historic District as well as a long term maintenance plan to prevent future issues.

Building Assessments

The Cultural Resources Section's long term goal is to generate and maintain a full assessment of the maintenance needs of all historic buildings within the NHL and Cold War Historic District. There are several types of documentation methods that can be utilized to achieve this goal, although funding limitations within the next five years, could significantly impact the depth of research conducted on each building and how many historic buildings can be completely documented. The Cultural Resource Section aims to continue to pursue a variety of documentation methods to achieve the full assessment of the Ladd Field NHL and Cold War Historic District, including but not limited to, Historic Structure Reports, Preservation Plans, and Historic American Building Surveys. Studies could include the identification of any structural or environmental conditions contributing to material failures, and lead to the development of a schedule with primary and secondary maintenance needs for historic buildings.

In addition, a system for benchmarking historic buildings to determine their baseline energy use will be developed through the use of energy audits. These types of audits can be an effective and inexpensive

[85] A list compiled through Facility Maintenance, which states projected, funded, and prioritized projects over the next "1" to however many "n" years.

way to find basic issues that may be contributing to larger maintenance problems. This level of audit evaluates a building's energy consumption by analyzing energy bills and performing a building walk-through. Recommendations that come from this type of audit are typically low-cost, no-cost and capital improvement measures. All of the above types of documentation completed within the next five years will aid in the identification of areas requiring additional investigation and will become an essential strategic component of Fort Wainwright's Maintenance Plan. Within the next five years, the Cultural Resources Section has set a practical goal of acquiring funding for and completing in-depth research on approximately 20% of the historic buildings within the NHL.

USAG FWA is seeking creative funding solutions for projects to enhance the knowledge and understanding as stewards of the Ladd Field NHL and Cold War Historic District. A Legacy proposal was submitted to identify creative solutions to maintenance issues commonly caused by the harsh Alaskan climate.

Inspections

DPW already completes scheduled inspections through the Facility Maintenance Branch and yearly funds prioritized repairs off the 1-n list. The Cultural Resources Section plans to participate in this established inspection process. Ideally, inspections of historic buildings within the NHL will include photographs and written documentation of exterior and interior conditions of the building, a basic check for pest infestations, and water damage. To achieve this goal of establishing scheduled inspections of historic buildings on Post, the Cultural Resources Section will work with the Facility Maintenance Chief to facilitate cooperation with and education of staff within the Cultural Resource Section. In the course of performing inspections with maintenance specialists the Cultural Resource Section will gain valuable knowledge regarding the accepted process utilized for submitting work orders to initiate repairs. Through this process the Cultural Resources Section will become more informed stewards of the repair and maintenance needs of the historic buildings on Post and, as a result, can proactively advocate for and seek funding for these issues.

After learning the above process, the Cultural Resource Section will design and create an inspection form based on facilities maintenance documents but tailored to historic buildings. A draft version of the building inspection form is located in Appendix I. Inspections will be conducted primarily unaided, unless specific situations or questions arise. Also, scheduled project follow-ups will be conducted to ensure there have been no changes in the scope of work for projects already approved and awarded. A long-term goal of these inspections will be to incorporate and use them in conjunction with more detailed and in-depth studies to assist the Cultural Resources Section in becoming advocates for the repair and maintenance of historic buildings. The Cultural Resources Section will have all the needed information to submit work orders and advocate for maintenance funding.

Integration of Information

Finally, results of in-depth studies and maintenance inspections can be submitted and integrated with other documents maintained on Post, such as the Installation Design Guidelines, pre-design and construction meetings, and can be accessed to provide information during management, development, or emergency issues.

A summary of the yearly short-term maintenance needs is provided in the table below. This table is based off the 1-n list provided on a yearly basis by the Facility Maintenance Branch. All long-term maintenance needs will be identified in a future study, including the identification of any structural or environmental

conditions contributing to material failures, which will directly assist in the development of primary and secondary maintenance needs.

Historic Building Number	Project Title
2077	Install light fixtures
2077	Install overhead hoists
2104	Repair interior
2107	Repair interior
2079	Repair interior
1558	Install backup generator
2077	Repaint safety lines
1557	Install improved fire protection system
1557	Improve sprinkler system
2200-2207	Repair roof
4391	Repair sidewalk
2077	Replace condensate
1047	Install handrails
1555	Replace stair treads
1555	Paint basement offices
1060	Install electrical outlets
1555	Shield camera cables for SCIF
1555	Install drain
1558	Clean mooring points
1558	Clear airfield approach area
1558	Repair damaged airfield fence
2077	Install interior man door
1021	Install blinds on ground floor
1557	Install antenna
2077	Install outlet in welding shop
1557	Install washing machine
2077	Hardwire compressors
2104	Construct door to room 21

5.11 Shared Public Data

The confidentiality of the nature and location of archaeological resources is provided for in 32 CFR § 229.18. The confidentiality and location of historic properties is provided for in 36 CFR § 800.11, pursuant to Section 304 of the NHPA. USAG FWA and the SHPO signed a user agreement in 2011 in which the State of Alaska agreed to share historic properties site location information for Fort Wainwright with USAG FWA. This information is maintained on a GIS database.

Ownership of information provided by Alaska Native tribes remains with the tribes. Confidentiality of information is important and includes responsible, accountable use of information provided by the tribes to USAG FWA.

USAG FWA's cultural resource documents will be prepared so that maps of specific site locations are easily removable. Documents for the public will be produced so that specific location information (i.e., AHRS forms) is not included.

NHPA and NEPA require federal agencies to provide tribes, interested parties and the public with the opportunity to comment on historic properties management activities that may affect them. The process used to accomplish consultation on these issues regarding USAG FWA-managed lands is the NEPA process outlined in 40 CFR § 1506.6 "Public Involvement". AR 200-2 and Section 106 also provide procedures for involving the public.

Participants in public involvement in general include:

- Installations
- Public Affairs Officer
- SHPO
- National Park Service, Alaska Region
- Alaska Native tribes
- Alaska Native organizations (e.g., Alaska Native Corporations)
- Other federal or state agencies
- General public
- Local governments
- Other interested parties

In accordance with Executive Order 13175, the Garrison Commander must directly contact Alaska Native tribes when their participation is needed. This process is separate from and in addition to the public process and is based on the government-to-government relationship between federally-recognized tribes and the federal government.

Non-federally-recognized tribes and other Alaska Native organizations may express interest in certain activities and will be invited to participate on the same basis as other members of the public. Some Alaska Native organizations, such as tribal consortia, may participate in government-to-government consultation only if designated by a federally-recognized tribe as acting on their behalf

5.12 Curation of Artifacts

Artifacts recovered through cultural resources management activities must be curated in compliance with 36 CFR § 79, *Curation of Federally-Owned and Administered Archaeological Collections*. This regulation and 48 FR 44737, *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines*, establish standards that curation facilities must meet in order to house artifacts removed from public lands. The curation of artifacts removed from USAG FWA-managed land is the responsibility of the Cultural Resources Manager, acting on behalf of the Garrison Commander.

The University of Alaska Museum of the North (UAMN) in Fairbanks serves as the primary repository for cultural and natural history collections from university research and academic units, state and federal agencies, and Alaska Native corporations. As such, it will curate artifacts recovered from USAG FWA installations.

It is the responsibility of BLM, as an ARPA permitting agency, to ensure that those holding permits properly prepare and deposit collected artifacts at the UAMN. ARPA permit holders conducting surveys

on USAG FWA installations must prepare artifacts for curation in accordance with the requirements identified in the permit. The UAMN has specific requirements for preparation of artifacts that must be met prior to acceptance for curation. This will be clearly spelled out in any permits that may require the curation of recovered artifacts.

The Cultural Resources Manager will ensure that all artifacts recovered as a result of Army undertakings on USAG FWA-managed lands are properly curated. Through an agreement with the UAMN, USAG FWA has procedures in place for curation of artifacts recovered from USAG FWA-managed lands. Scopes of work and contracts drawn up for archaeological surveys will include a copy of the guidelines for curation of artifacts, as required by the UAMN. The Cultural Resources Manager will include the costs of curation as part of the overall project costs.

Contact information for the University of Alaska Museum of the North:

Archaeology Collections Manager
University of Alaska Museum
P.O. Box 756960
Fairbanks, AK 99775
(907) 474-6943

5.13 Capacity Building for Alaska Native Tribes

The USAG FWA Cultural Resources Program may place significant demands on the regulatory, administrative, and management structure of Alaska Native tribes. USAG FWA can increase tribal capacity for dealing with cultural resource management issues by providing technical assistance, equipment and facilities, training, and access to culturally significant sites. USAG FWA may also provide technical assistance to aid tribes with understanding USAG FWA documents when requested. Possible examples of capacity building programs to explore may include, but are not limited to, the following:

- Section 106 training
- NEPA training
- GIS and GPS training/program development
- National Register training
- Properties of traditional, sacred and cultural importance training
- USAG FWA Cultural Resources tribal seasonal technicians

The implementation of capacity building programs is dependent on the availability of funds.

Development of mutually beneficial agreements between USAG FWA and Alaska Natives tribes can also build tribal capacity significantly. Such agreements would be accomplished through work sessions between USAG FWA and interested tribes. This process ensures the inclusion of procedures and outcomes desired by any one tribe and should not exclude ideas and desires of other tribes.

- Develop, improve and expand the awareness of historic properties and their preservation on the part of military and non-military personnel and the public.
- Develop and implement a cultural resources awareness program for military and non-military personnel.
- Develop an interpretive program for public education.

5.14 Incorporating Traditional Knowledge into Cultural Resources Management

USAG FWA recognizes the special relationship Alaska Natives have with the land and respects the traditional knowledge held by the tribes in understanding the land and its natural and cultural resources. USAG FWA also acknowledges the importance of the land and its resources to the traditional cultural values and cultural identity of Alaska Natives. It is understood that the separation of "nature" and "culture" is a western concept and not necessarily the worldview of Alaska Natives. It is important that Army land managers understand the need for incorporating consideration of traditional knowledge about the cultural significance of the land and its resources into the management of resources that may exist on USAG FWA-managed lands.

This section of the ICRMP is intended to apprise installation Cultural Resources Manager , other installation staff, and others who might directly or indirectly be involved in the management of historic properties, of Alaska Native views regarding natural and cultural aspects of the environment. This includes Alaska Native traditional knowledge and its relationship with the environment so that non-native land managers more fully understand and, therefore, more fully consider the views of Alaska Natives in their decision-making and management activities. This section attempts to define traditional knowledge and sets forth management practices regarding traditional knowledge.

- Traditional knowledge can be defined as the totality of all knowledge and practices used today based on past experiences and observation. It is a collective property of a distinct culture and generally an attribute of a particular people who are linked through various economic, cultural and religious activities. Traditional knowledge is respected, used, and passed on.

- Traditional knowledge is carried in and communicated through the beliefs, customs, and practices of a living community that are passed down through generations, generally through the spoken word or oral history and through the practice of traditional skills. Part of what makes the knowledge traditional is the fact that it is not written down. It is understood that traditional knowledge is not to be overlooked or discounted in cultural resource management simply because it is not recorded in written form.

- Traditional knowledge provides Alaska Natives with an understanding of how lands and places have been used and the significance these places have in their cultural identity. This knowledge is important in identifying areas that may require special management considerations.

5.14.1 Identifying Traditional Knowledge

The significant places about which Alaska Natives hold traditional knowledge may be accorded certain standing and consideration under various federal statutes, regulations, and executive orders, such as considerations of properties of traditional religious and cultural importance (also known as traditional cultural properties) under Section 106 of NHPA, sacred sites under Executive Order 13007, AIRFA and NAGPRA.

NHPA requires federal agencies to consult with tribes that may attach religious or cultural significance to properties that may be affected by an undertaking. As identified in National Register Bulletin 38 "Guidelines for Evaluating and Documenting Traditional Cultural Properties," tribal knowledge is a key element of identifying properties of significance to tribes. Therefore, the bulletin directs agencies to work with tribes using traditional knowledge to assist in identifying properties that may have significant values

to tribes. It is further emphasized in the bulletin that it is the tribal members using traditional knowledge who are able to identify what is culturally, traditionally, and religiously significant to them. This subject cannot be addressed by an entity outside of the tribe.

For the purposes of this ICRMP, it is the responsibility of the tribe, not USAG FWA, to identify the appropriate traditional knowledge holders who can identify resources that have significance to the tribe. There are no recognized standards outside of the tribe that directs USAG FWA on the qualifications of who may be a traditional knowledge holder.

5.14.2 Understanding Traditional Knowledge and its Importance for Historic Properties Management

Traditional knowledge is the special knowledge that different tribes and people possess about all the things, activities, feelings, and parts of their universe that contribute to their existence as a tribal entity or a people through time. It is handed down through the generations and usually by word of mouth. This knowledge, as an example, may include a tribal member's understanding about how to collect natural resources such as berries, fish, and animals and their understanding about sites on the land that may be associated with those activities. This knowledge may also include the proper way in which these activities took place in the past and the meaning of these activities to tribal identity.

Those responsible for considering effects to resources will be better prepared to implement their considerations taking into account the views of Alaska Natives by appreciating traditional knowledge and its breadth of application to the environment.

The implementing regulations for NHPA (36 CFR § 800) require federal agencies to consult with tribes in order to identify any properties of traditional religious and cultural importance that may be affected by a proposed undertaking and to gather information from tribes about these properties while also acknowledging that "Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them" (36 CFR § 800 (4) (c) (1)).

5.14.3 Confidentiality

Traditional knowledge is the property of the people that possess it. USAG FWA will take measures to maintain the confidentiality of this information from the general public or other parties that may not have the interest of the tribes at heart. To insure confidentiality of this information, the following steps will be implemented:

- The tribe providing the information will retain ownership of the information.
- USAG FWA will request tribes to identify sensitive areas rather than site-specific location information.
- USAG FWA will recognize the expertise of the traditional knowledge holders in identifying what is significant to the tribe and consider appropriate management measures.
- USAG FWA may assist the tribes in developing a database for managing information on sites significant to the tribe and that are on USAG FWA-managed lands.

USAG FWA will work cooperatively with appropriate tribes when undertakings may affect or be proposed in or near locations that may be of traditional religious and cultural importance to the tribes. Through consultation with the appropriate tribes, USAG FWA will attempt, to the extent possible, to

avoid adverse effects by identifying locations of traditional religious and cultural importance and especially to those locations that may be determined eligible for inclusion on the National Register.

6 IMPLEMENTING THE ICRMP

Army Regulation 200-1 requires not just preparation and update of an ICRMP, but “implementation” of the ICRMP. The following section discusses the definition and funding aspects of implementation.

Implementation anticipates the execution of all high priority projects and activities in accordance with specific timeframes identified in the ICRMP.

An ICRMP is considered to be “implemented” if an installation:

- Actively requests, receives, and uses funds for “must fund” projects and activities;
- Ensures that sufficient numbers of professionally trained cultural resources management personnel are available to perform the tasks required by the ICRMP;
- Coordinates annually with all internal and external cooperating offices or;
- Documents specific ICRMP action accomplishments undertaken each year.

Cultural resource requirements defined by the Office of the Secretary of Defense as environmental "must fund" are those projects and activities required to meet recurring cultural resources conservation management requirements or current cultural resources compliance needs. The Army equivalent to Office of the Secretary of Defense's "must fund" projects are projects as described in classes 0, 1 and 2 High (2H) in current Army policy and guidance for identifying environmental project requirements.

All projects listed in an ICRMP are not necessarily high priority. Implementation of ICRMPs is a shared responsibility among those activities that affect those resources as well as those who ensure compliance and provide overall program oversight. Accordingly, projects necessary to implement ICRMPs are not limited to environmental funds.

6.1 Cultural Resources Implementation Goals and Objectives

The Cultural Resources Program includes all the tasks required to plan, organize, and implement, and operate the Cultural Resources Program for USAG FWA. Goals for Cultural Resources Program implementation are listed below:

- Enable USAG FWA to maintain compliance with NHPA and other cultural resource laws and regulations.
- Prepare, update, and submit high priority projects on time annually.
- Develop, update, and execute an environmental spending plan annually.
- Contribute to Installation Status Report and Army Environmental Database -Environmental Quality Report on time annually.
- Maintain designated cultural resources professionals with appropriate training and qualifications.
- Prepare, update, and execute MOUs, MOAs, and PAs as required to accomplish cultural resources management.

6.2 Reporting

USAG FWA is responsible for submitting reports for funding requirements, funding work plans, and environmental quality status. USAG FWA must annually submit the Army Environmental Database-Environmental Quality and the Installation Status Report, Part II Environmental.

6.3 Cooperative Agreements

A priority for partnering and accomplishing work to implement this plan is through Cooperative Agreements (CAs). Army Regulation 200-1 directs that, where applicable, an installation should enter into CAs with state and federal conservation agencies for the preservation and stewardship of cultural resources.

As a general rule, federal agencies, including the Army, must engage in full and open competition in accordance with the Federal Acquisition Regulation to obtain goods and services. Congress, however, has created exceptions to that rule through enactment of independent statutory authority, empowering federal agencies to procure goods and services from other federal agencies, states, local governments, and private non-profit organizations through interagency agreements or CAs. Installations are hereby authorized to develop and implement interagency agreements and/or CAs, relevant to cultural resources management, with said entities on the basis of the following statutory authorities:

(1) Economy Act, 31 USC. 1535, authorizes the Army to issue orders to other federal agencies to provide goods or services, so long as the order is in the best interests of the government, is cheaper or more convenient than procurement under contract, and does not conflict with another agency's authority.

(2) Title 10 USC. Section 2684 authorizes the Army to enter into CAs with states, local governments, or other entities for the preservation, maintenance, and improvement of cultural resources on military installations and for the conduct of research regarding cultural resources on installations. (National Defense Authorization Act for Fiscal Year 1997, Pub. L. No. 104-201, 110 Stat. 2422, Section 2862 (1996), adding section 2684 to Chapter 159 of title 10 of the United States Code.).

(3) Agreements (e.g., MOUs and CAs) have been established between the DoD, other federal agencies and non-profit organizations, which provide arrangements for DoD components to enter into implementing agreements with such agencies and organizations for the attainment of mutual conservation objectives. Garrison Commanders, utilizing relevant and appropriate statutory authority, as set forth above, may develop and sign implementing Interagency Agreements or CAs with said entities. All Interagency Agreements and CAs entered into in accordance with the provisions of this section must receive technical and legal review prior to the Garrison Commander's signature.

USAG FWA has developed or is in the process of developing the following agreements to implement this plan.

- MOA with the Tanana Yukon Historical Society. This agreement with the Tanana Yukon Historical Society provides government-to-government support and cultural resources services.
- MOA for curation support. This agreement between USAG FWA and the University of Alaska provides cultural resource curation support.
- CA for natural, cultural, and environmental support. This agreement with the Center for Environmental Management of Military Lands at Colorado State University provides support for natural and cultural resources, as well as environmental management.

6.4 NHPA Section 106 Agreements

PAs and MOAs executed pursuant to Section 106 of the NHPA and its implementing regulations at 36 CFR § 800 are compliance agreements that set forth how the Army will satisfy its responsibilities in the event of an Army undertaking that will affect a historic property. Section 106 PAs that address and define ongoing installation-wide undertakings associated with mission activities and their effects on historic properties over the Army's five-year programming and budgeting cycle are encouraged because they can streamline the NHPA compliance process and serve as a program management tool. Any management procedures and determinations provided in PAs and MOAs are integrated into the installation's ICRMP. However, NHPA PAs and MOAs will not refer to or implement an ICRMP. The following are Section 106 MOAs and PAs that are currently active.

- Privatization of Military Housing (65732-0024/LEGAL 14147121.10)
- Aviation Stationing (FWA-MOA-0917)
- Amended Monitoring and Treatment Plan of Archaeological Sites Located within the Surface Danger Zone (SDZ) of the Battle Area Complex (BAX) Training Facility at DTA (FWA-PA-I003)
- The Construction of an Americans with Disabilities Access Ramp for Building 1051 (FWA-MOA-1004)
- The Installation of a Heating Ventilation and Air Conditioning System in Building 1555 (FWA-MOA-1008)
- Northern Rail Extension between North Pole and Delta Junction (STB Finance Docket No. 34658)
- The Operation, Maintenance, and Development of the Army Installation at Fort Wainwright and Associated Training Areas (FWA-PA-1015)
- The Removal of the Overhangs and Stairwells for Building 3008 and Building 3005 (FWA-MOA-1103)
- The Renovation to Building 2079 (FWA-MOA-1105)
- The Renovation to Building 3004 (FWA-MOA-1106)

6.5 Organizational Enhancement, Roles, and Responsibilities

6.5.1 Cultural Resource Organization

The Conservation Branch is a sub-component of the USAG FWA's Environmental Division. Other branches within the Environmental Resources Division include Planning, Compliance, and Restoration. The Cultural Resources Section is a part of the Conservation Branch.

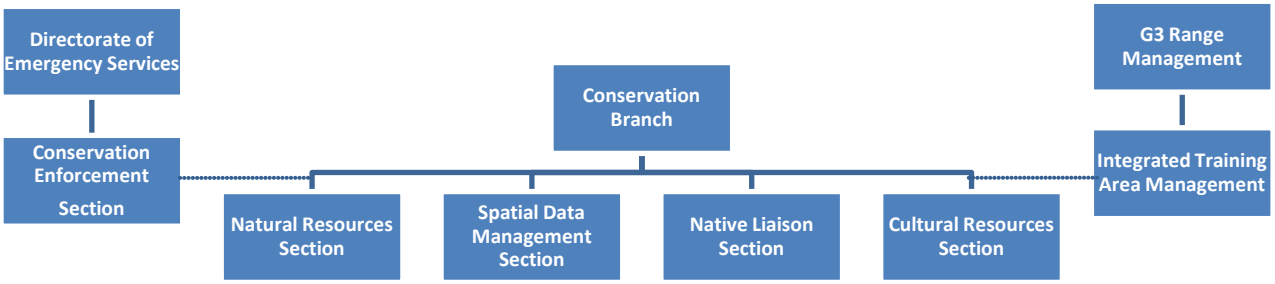


Figure 3. Conservation Branch Organizational Chart

6.5.2 Staffing

The management and conservation of cultural resources under Army stewardship is an inherently governmental function. Therefore, the provisions of Army Regulation 5-20 (*Commercial Activities Program*) do not apply to the planning, implementation, enforcement, or management of Army cultural resources management programs. This includes all positions (for example, professional and technical) that have been validated as a requirement to perform cultural resources management. However, support to the Cultural Resources Section, where it is severable from management, planning, implementation or enforcement actions of cultural resources, may be subject to the provisions of Army Regulation 5-20. Personnel positions associated with activities that support (on an as-needed basis), the Cultural Resources Section (for example, field crews) may be subject to the provisions of Army Regulation 5-20.

The ideal situation would be for all positions to be full-time, permanent federal positions. Considering current Army personnel policies, the addition of permanent, full-time federal positions is not likely in the foreseeable future. A blended workforce is a necessity. USAG FWA is also directed by Army Regulation 200-1 to seek technical assistance from appropriate cultural resources agencies (federal, state, and local). USAG FWA will pursue options to fill staff positions in a manner that will accomplish the most efficient blended workforce possible.

Since the cultural resources disciplines encompassed within this ICRMP are the cultural and anthropological sciences, USAG FWA is mandated by Army Regulation 200-1 to establish the optimum staffing of cultural resources management professionals, appropriate to the resources, to ensure necessary technical guidance in the planning and execution of the Cultural Resources Program. USAG FWA will establish positions as needed and fill validated positions in accordance with current DoD/Department of Army policy.

Full implementation of this ICRMP requires full-time cultural resources positions, as well as assistance from USAG FWA's partners and cooperators. Specific needs from organizations external to USAG FWA are indicated throughout this document. It is impossible for USAG FWA to hire the specialized expertise needed for some projects within this ICRMP. USAG FWA will require considerable expertise from universities, agencies, and contractors to accomplish some tasks. USAG FWA will reimburse parties for much of this assistance.

Federal In-house Capabilities: USAG FWA has limited in-house federal positions as a result of manpower restrictions.

Federal Agency Support: USAG FWA could utilize personnel support from other federal agencies; however, this option has not been used previously and is not anticipated to be used during 2012-2017. These types of personnel meet requirements for "government in nature" positions for planning, management, and enforcement of cultural resources.

State Agency Support: The Intergovernmental Personnel Act of 1972 is a means to obtain personnel support. The Intergovernmental Personnel Act allows for a system where a federal or state agency "borrows" other federal or state agency personnel for a limited time to do a specific job. Any state or federal agency is authorized to participate. The installation pays the borrowed employee's salary and administrative overhead. Major advantages are that personnel not considered contractors can represent and obligate the federal government, and manpower authorizations are not required. Intergovernmental Personnel Act employees are considered part of the USAG FWA staff and can be directly supervised by federal employees. Intergovernmental Personnel Act employees are bound by ethics rules of both their home state agency as well as federal ethics regulations. These types of personnel meet Sikes Act

requirements for "government in nature" positions for planning, management, and enforcement of cultural resources.

University Assistance: Support to the Cultural Resources Section, where it is severable from management, planning, implementation or enforcement actions of cultural resources, may be provided by on-site contract personnel. Due to the Sikes Act's preference for other federal and state agencies with cultural resource expertise, state universities receive first preference for providing on-site cultural resources contract personnel support. USAG FWA has used several universities in recent years to help with specialized needs. University of Alaska has provided research support to USAG FWA. The primary source of on-site university personnel assistance has been Colorado State University to help implement the USAG FWA Cultural Resources Section. These on-site support positions are not considered "government in nature."

Contractor Support: As a final option for manpower assistance, USAG FWA may turn to outside contractors for tasks that are severable from management, planning, implementation or enforcement actions of cultural resources. Contractors give USAG FWA access to a wide variety of expertise. Contractors may be used for projects such as historic building inventory, plan preparation and similar activities.

6.5.3 Qualifications

Pursuant to Section 112 of NHPA, agency personnel or contractors responsible for historic properties analysis must meet qualifications standards established by the Office of Personnel Management in consultation with the Secretary of the Interior. These are *The Secretary of the Interior's Professional Qualification Standards*, defined in 36 CFR § 61. Historic properties management activities discussed in this ICRMP must be conducted and/or supervised by cultural resources professionals with the minimum qualifications that meet the standards for the appropriate discipline. The disciplines represented on staff should reflect program or garrison needs based on the types of cultural resources located at installations. The qualifications for an archaeologist, historian, architectural historian and historical architect can be found at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

6.6 Coordination

A blended workforce consisting of federal employees, Intergovernmental Personnel Act staff, university personnel, and contract personnel also contributes to chain-of-command challenges. Therefore, USAG FWA has instituted a framework of conservation and cultural resource teams, in-progress reviews, and periodic training to meet these challenges.

6.6.1 In-Progress Review

The USAG FWA Conservation and Integrated Training Area Management In-Progress Review process is the forum by which Conservation personnel report annual accomplishments and brief future plans and requirements to the USAG FWA Environmental Chief, U.S. Army Alaska Range Manager and Range Officers. The In-Progress Review provides an opportunity for discussion between the Conservation personnel and the USAG FWA Range and Environmental staffs. Installation Management Command Pacific Region Conservation and U.S. Army Pacific Command Integrated Training Area Management personnel are also invited to participate.

6.6.2 Training

Interdisciplinary training is essential for DoD Cultural Resources Managers and staff to address practical job disciplines, statutory compliance requirements, applicable regulations, and current scientific and professional standards as related to the preservation of cultural resources. The cultural resources training objective is to identify and help achieve technical requirements as well as to facilitate the implementation of a successful and proactive program. The goal is to maintain and enhance the military mission, biodiversity, conservation stewardship, and the management of the total ecosystem from the practical standpoint of day-to-day operations as well as long-term planning.

Pursuant to Section 112 of NHPA, agency personnel or contractors responsible for historic properties must meet *The Secretary of the Interior's Professional Qualification Standards* (36 CFR § 61). Appropriate training will assist the Cultural Resources Manager in carrying out cultural resources management activities on Fort Wainwright, ensuring compliance with historic preservation laws.

Educating USAG FWA staff on cultural resources laws and regulations will assist in achieving and maintaining compliance. Basic training for unit Commanders on historic preservation laws and regulations, basic requirements of this ICRMP, and an introduction to the history of Fort Wainwright will provide them with the necessary tools to be good stewards of the historic properties on Fort Wainwright.

An environmental training including historic preservation and cultural resources appreciation for military officers on the installation has been developed and implemented, as well as, a public education program through partnering with interested parties to develop interpretive material. Interdisciplinary training is essential for DoD Cultural Resource Managers and department staff. The Cultural Resources Manager will provide training, as necessary, for any tenant or outside agency to understand the requirements for coordinating a project with the Cultural Resources Section and will coordinate all undertakings by tenant or outside agency that affect a historic property with the SHPO, ACHP, and interested parties. The training will address practical job disciplines, statutory compliance requirements, applicable DoD/DA regulations, pertinent state and local laws, and current scientific and professional standards as related to the conservation of our nation's cultural resources.

It is important for the Cultural Resources Section to be knowledgeable in the issues affecting the historic integrity of the districts it maintains but to also be knowledgeable in how these issues can affect USAG FWA's mission.

The Cultural Resources Section's staff is encouraged to attend a minimum of two professional development activities per fiscal year. At least one activity will be a training course based on current department needs, while the other event may be a professional conference to keep staff updated on current preservation and archaeology issues, solutions, and new technologies. These trainings will increase the competence level of the staff as well as keep skills fresh.

USAG FWA has begun to develop, in consultation with the SHPO, curriculum for an internal training for USAG FWA DPW staff and contractors concerning a variety of preservation concerns. The curriculum is drawn from the technical preservation bulletins published by the National Park Service. This series of training courses includes:

- Section 106 Overview
- *The Secretary of the Interior's Standards for the Treatment of Historic Properties*
- Determining Character-Defining Features of Historic Properties
- Repair versus Replacement of Historic Materials
- Adaptive Reuse of Buildings

- Treatment of Interior Spaces
- Accessibility, ADA Standards and Historic Properties
- Conserving Energy in Historic Buildings
- Roofing for Historic Buildings
- Cleaning, Repair and Maintenance of Historic Buildings
- Siding of Historic Buildings
- Additions on Historic Properties
- Preservation of Historic Concrete
- Heating, Ventilating and Cooling Historic Buildings
- Mothballing Historic Buildings
- Cultural Landscapes

The intent of these courses is to provide an overview of common issues for projects with historic preservation concerns. They are intended to provide a starting point for engineers to give them a greater understanding of the types of considerations that need to be taken into account for projects dealing with historic properties. These courses will provide a baseline of knowledge to encourage dialogue between USAG FWA engineers and the Cultural Resources Section.

6.7 Outreach

Outreach is another foundational component of cultural resources implementation. Each Cultural Resources Section area conducts outreach activities, and the Cultural Resources Section management function integrates those efforts through the conservation webpage, conservation newsletter, and other outreach events.

6.8 Financial Management and Funding

Another significant component of USAG FWA Cultural Resource Program management is financial management. Financial management consists of funding, budgeting, and contracting. These three components all are extremely important to USAG FWA's ability to implement this plan.

The intent of the funding section of this ICRMP is to link resources with the goals established. The funding section of this plan will therefore be used to develop and support environmental funding requirements. Plans and studies for historic property identification, evaluation, maintenance, stabilization, repair, rehabilitation, conditions assessments, and reports are eligible for environmental funds when such documents are developed in accordance with professional historic preservation standards and guidelines established by the Secretary of the Interior.

IMCOM policy for use of environmental funds for cultural resources activities is established in annual funding guidance. The funding guidance also specifies projects and activities that are not eligible for environmental funding. Projects and activities that are not eligible for environmental funding include repair, maintenance, and rehabilitation of historic properties (including National Register-eligible and listed buildings, structures, sites, objects, landscapes, districts, and cemeteries). Even in cases where repair, maintenance, and rehabilitation activities are stipulated and required in NHPA Section 106 PAs or MOAs, such activities remain not eligible for environmental funds.

6.8.1 Environmental Funding

Environmental funds are a special category of the Army's budget. The purpose of environmental funding is to enable the Army mission by funding monitoring, compliance and continuing oversight of installation cultural resources. Environmental funding may only be used to fund certain cultural resources mitigation projects such as surveys, inventories, historical reports, educational pamphlets, brochures, or posters.

6.8.2 Facilities Funding

Army facilities are funded with two types of funding that could be used to maintain historic properties: (1) Sustainment, Restoration, and Modernization; and (2) Base Operating Support.

The purpose of Sustainment, Restoration, and Modernization funding is to enable the Army mission by funding the sustainment of range and other facilities in good working order to meet long-term doctrinal training requirements. The purpose of restoration funding is to restore failed or failing facilities; systems, and components damaged by a lack of sustainment, excessive age, fire, storm, flood, freeze, or other natural occurrences; and to improve facilities to current standards. Modernization funding adapts facilities to meet new standards and includes the erection, installation, or assembly of a new real property facility; and the addition, expansion, extension, alteration, conversion, or complete replacement of an existing real property facility.

Base Operating Support funding provides for those activities of an installation support nature. It includes those support elements and services identified as indirect overhead by Headquarters, Department of Army and grounds maintenance activities. This includes abatement and disposal of building hazardous waste resulting from the performance of Real Property Services.

6.8.3 Other Funding

The Legacy Program remains an additional source of funding. However, funding for the Legacy Program has been greatly reduced from past levels. The only types of Legacy projects available for funding are large projects, regional in scope, involving many other agencies as partners. While USAG FWA will continue to seek Legacy funding, it is not expected to be a viable source for implementing this ICRMP.

6.8.4 Budgeting

The Environmental Program works together with the Resource Management Office to manage the environmental budget. USAG FWA uses an environmental obligation plan (cultural resources is included in this) to communicate planning requirements and to help manage the annual budget.

6.8.5 Contracting

The contracting process includes two primary components: (1) purchase and acquisition, and (2) contract management. Purchase and acquisition is necessary to get a contract in place, and then contract management is necessary to ensure good communication between the government and contractor to enable good contract performance.

Purchase and Acquisition: The first step in the contract process is purchase and acquisition. USAG FWA Environmental starts the process by clearly defining desired services in a Statement of Work, estimating costs, and initiating a purchase request. USAG FWA Environmental works together with a contracting agency to develop an acquisition strategy, using the Sikes Act priority to guide decision-making.

The Economy Act of 1932, as amended, allows federal agencies to obtain services directly from other federal agencies or utilize contracts already in place by other federal agencies. The Military Interdepartmental Purchase Request is used to acquire cultural resources conservation services. Natural resources support services may also be obtained non-competitively through contracts with state and local agencies. In this case, a purchase request must be submitted through the Directorate of Resource Management to a contracting agency. Conservation personnel work together with the contracting agency to develop an acquisition strategy, Statement of Work, and government estimate. The government must prepare a Statement of Work and government estimate for each purchase request.

Contract Management: Once a contract is in place, USAG FWA Environmental must nominate a federal Contract Officer's Representative to help the Contract Officer manage the contract. The Contract Officer authorizes the Contract Officer's Representative to verify that the contractor performs the technical requirements of the contract, to perform necessary inspections, to maintain liaison and direct communications with the contractor, to monitor the contractor's performance, to submit a monthly report concerning performance of services rendered, and to coordinate site entry for contractor personnel.

6.9 Command Support

Command support is essential to implement this ICRMP. Without this support, priority projects for cultural resources management will not occur. Failure to execute these projects risks violation of environmental laws, reduced mission readiness, and negative public reaction to a lack of environmental stewardship. The Installation Commander is responsible for compliance with environmental laws and sets the tone for environmental stewardship. Command emphasis on this ICRMP ensures a healthy environment, sustainable resources, and quality future training lands.

Appendices

Appendix A. Historic Buildings and Structures Surveys

The National Park Service conducted the first building survey of Fort Wainwright in 1984. This survey was conducted as part of the process to identify extant buildings associated with the World War II era Ladd Field. This survey resulted in the designation of Ladd Field as a National Historic Landmark (NHL) (Table A-1).

The entire Fort Wainwright Main Post has been inventoried and evaluated for eligibility for inclusion in the National Register under the World War II and Cold War historic contexts (Table A-2 and A-3). Under the World War II context, Ladd Field has been designated a NHL. The Ladd Field NHL includes 18 contributing buildings and structures centered on the runways (Table A-2).

Under the Cold War context, the Main Post has been inventoried and evaluated with 70 buildings and structures centered on the runways contributing to the Cold War Historic District (Table A-3). This historic district was determined eligible for inclusion in the National Register but not formally nominated or listed.

Table A-1. Building Surveys of Fort Wainwright

Year	Researcher	Survey Location	Results
1984	National Park Service	Centered on airfield	Designation of Ladd Field National Historic Landmark with buildings contributing.
1995	SHPO/ USACE/ NPS	Review of WWII extant buildings on Fort Wainwright	Identified 48 extant WWII buildings that may have eligibility for inclusion in the National Register as a historic district and 11 extant buildings not eligible.
1998	SHPO	Boundary review of Ladd Field NHL	Review of 1984 Ladd Field NHL resulted in SHPO suggesting that the district incorporate 51 contributing buildings and structures and 48 noncontributing buildings and structures. This boundary review was never finalized and the NHL boundary was not changed.
2001	USARAK	Centered on Cold War Era missions and identification of buildings directly related to missions	Identification of Ladd Air Force Base Cold War Historic District, with 68 buildings/structures contributing to the historic district.
2010	USAG FW	Boundary review of Cold War Historic District and all buildings within the cantonment area, 45-years-old or older	Final boundary review accepted by the State Historic Preservation Officer. Number of contributing buildings and structures is reduced to 36.
2011	USAG FW	Officially reverted back to 1984 NHL boundary because the 1998 review was never finalized or accepted by NPS	18 buildings and structures from the original nomination.

Table A-2. Ladd Field National Historic Landmark Inventory – Fort Wainwright

#	BLDG #	AHRS #	NAME
1	1021	FAI-00448	Nurses Quarters
2	1024	FAI-00449	Radio Station
3	1043	FAI-00451	North Post Chapel
4	1045	FAI-00452	Murphy Hall
5	1046	FAI-00502	Garage
6	1047	FAI-00453	7 Apartments-Officers
7	1048	FAI-00446	Commander's Quarters
8	1049	FAI-00454	12 Apartments-NCO
9	1051	FAI-00456	14 Apartments-NCO
10	1541	FAI-00503	Bureau of Land Management – Alaska Fire Service
11	1555	FAI-00467	Hospital/Barracks
12	1557	FAI-00469	Hangar No 1
13	1562	FAI-00472	Quartermasters
14	2077	FAI-00504	Hangars No 7 and 8
15	3005	FAI-00482	Hangar No 3
16	3008	FAI-00485	Hangar No 2
17	N/A	FAI-01244, FAI-01246	North Runway
18	N/A	FAI-01245	South Runway
19	N/A		Parade Ground
20	N/A		Utilidors

Table A-3. Cold War Historic District Inventory – Fort Wainwright

#	BLDG #	AHRS #	NAME
1	1021	FAI-00448	Company Operations Annex
2	1024	FAI-00449	Red Cross
3	1043	FAI-00451	North Post Chapel
4	1045	FAI-00452	VIP Housing
5	1046	FAI-00502	Garage
6	1047	FAI-00453	Officers Quarters
7	1048	FAI-00446	Commander's Quarters
8	1049	FAI-00454	NCO Quarters
9	1051	FAI-00456	NCO Quarters
10	1533	FAI-00463	Warehouse

#	BLDG #	AHRS #	NAME
11	1534	FAI-00464	Warehouse
12	1537	FAI-00465	Warehouse
13	1538	FAI-00533	Warehouse
14	1541	FAI-00503	Airways & Air Communications Services
15	1555	FAI-00467	Headquarters
16	1556	FAI-00468	Reciprocal Engine Shop
17	1557	FAI-00469	Hangar 1
18	1558	FAI-00470	Airfield Operations
19	1562	FAI-00472	Air Force Service Stores No 4
20	2077	FAI-00504	Hangars No 7 & 8
21	2079	FAI-01259	Flight Communications Section
22	2080	FAI-011327	Water Supply
23	2104	FAI-01260	Falcon Missile Section
24	2107	FAI-01261	Flight Synthetic Trainer
25	2200	FAI-01806	Access Control Facility
26	2201	FAI-01230	Ordnance Storage
27	2202	FAI-01231	Ordnance Storage
28	2203	FAI-01232	Ordnance Storage
29	2204	FAI-01233	Ordnance Storage
30	2205	FAI-01234	Ordnance Storage
31	2206	FAI-01235	Ordnance Storage
32	2207	FAI-01236	Ordnance Storage
33	3004	FAI-1318	Fire Station
34	3005	FAI-00482	Hangar No 3
35	3008	FAI-00485	Hangar No 2
36	3203	FAI-00495	Ammo Bucker

Appendix B. Summary of National Register of Historic Places Criteria for Evaluation, Criteria Considerations, and Definitions of Integrity and Historic Context

As provided in 36 CFR § 60.4, the National Register Criteria for Evaluation are as follows:

Criteria: The quality of **significance** in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

> A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
> B. that are associated with the lives of persons significant in our past; or
> C. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
> D. that have yielded, or may be likely to yield, information important in prehistory or history.

Criteria Considerations (used to evaluate normally excluded properties): Some kinds of properties are normally excluded from National Register eligibility. These include religious properties, properties that have been moved, birthplaces and graves, cemeteries, reconstructed properties, and properties less than fifty years old. However, exceptions can be made for these kinds of properties if they meet one of the standard criteria above *and* fall under one of the seven special "criteria considerations" listed below:

- a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life; or
- a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- a property achieving significance within the past 50 years if it is of exceptional importance.

Integrity: In addition to significance, a cultural resource must possess "integrity" to be eligible for the National Register. Integrity is the ability of the resource to convey its significance, to reveal to the viewer the reason for its inclusion in the National Register. Integrity is a subjective quality but must be judged based on how the cultural resource's physical features relate to its significance. Seven aspects are used to define integrity. Some, if not all, should be present for the resource to retain its historic integrity: location, design, setting, materials, workmanship, feeling, and association. These concepts are defined as follows:

- Location: the place where the historic property was constructed or the place where the historic event occurred. The relationship between a historic property and its location is important to conveying the sense of historic events and persons and to understanding why the historic property

was created or why the event occurred. Moved historic properties are usually not considered eligible (see Criteria Considerations for exceptions).

- Design: the combination of elements that create the form, plan, space, structure, and style of a historic property. Design is the result of conscious decisions made during the original conception and planning of the historic property and includes elements such as organization of space, proportion, scale, technology, ornamentation, and materials. For districts, design includes the way sites, buildings, structure, or objects are related; for example, spatial relationships between major features; visual patterns of a landscape, etc.
- Setting: the physical environment of a cultural resource. This quality refers to the character of the resource's location. It involves how the historic property or site is situated and its relationship to surrounding features and open space. Setting can include such features as topography, vegetation, manmade features, and relationships between buildings and other features or open space. For districts, setting is important not only within the boundaries of the district, but also between the district and its surroundings.
- Materials: the physical elements that were combined or deposited during a particular period of time and, in particular, the pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of the creator(s) and suggest the availability of particular types of materials and technologies. A historic property must retain the key exterior materials dating from the period of its historic significance. If rehabilitated, those materials must have been preserved. Re-creations are not considered eligible for the National Register.
- Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history (post-contact) or prehistory (pre-contact). Workmanship is the evidence of artisans' labor and skill in constructing or altering a site, building, structure, object, or district and may apply to the historic property as a whole or to individual components. This aspect of integrity provides evidence for the technology of a craft, illustrates the aesthetic principles of a historic (post-contact) or prehistoric (pre-contact) period, and reveals individual, local, regional, or national applications of both technological practices and aesthetic principles.
- Feeling: a historic property's expression of the aesthetic or historic sense of a particular period of time. Feeling results from the presence of physical features that, taken together, convey the property's historic character.
- Association: the direct link between an important historic event or person and a cultural resource. A resource retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer.

Historic Context: Historic context provides the framework for evaluating specific properties. Historic context consists of the patterns and trends in history or prehistory, organized by theme, place and time, which allow a property to be understood. Contexts can be local, regional, or national in scope, and their themes can range widely to include prehistory, economics, technology, cultural affiliation, architecture, transportation and other topics. Historic contexts identify property types that represent the past activity and are often prepared as formal studies. Examples include *Historic Context for DoD Installations, 1790 to 1940*; and *Early Mining History: Fort Wainwright and Fort Greely*. Resources may be evaluated under multiple contexts. It is possible for a resource that is not eligible for the National Register under one historic context to be found eligible under another, or for a property to be eligible under multiple contexts.

Appendix C. Ladd Field National Historic Landmark Nomination Package

NPS Form 10-900
(3-82)

OMB No. 1024-0018
Exp. 10-31-84

United States Department of the Interior
National Park Service

National Register of Historic Places Inventory—Nomination Form

For NPS use only
received
date entered

See instructions in *How to Complete National Register Forms*
Type all entries—complete applicable sections

1. Name

historic Ladd Field

and or common Fort Wainwright

2. Location

street & number ___ not for publication

city, town ___ X vicinity of Fairbanks

state Alaska code 02 county Fairbanks North Star code 090

3. Classification

Category	Ownership	Status	Present Use	
X district	X public	X occupied	___ agriculture	___ museum
___ building(s)	___ private	___ unoccupied	___ commercial	___ park
___ structure	___ both	___ work in progress	___ educational	___ private residence
___ site	**Public Acquisition**	**Accessible**	___ entertainment	___ religious
___ object	___ in process	X yes: restricted	___ government	___ scientific
	___ being considered	___ yes: unrestricted	___ industrial	___ transportation
		___ no	X military	___ other:

4. Owner of Property

name United States Army

street & number

city, town Fort Wainwright ___ vicinity of state Alaska 99707

5. Location of Legal Description

courthouse, registry of deeds, etc. Director of Facilities, HQ 172d Infantry Brigade (AK),

street & number Engineering (AFZT-FE-PS)

city, town Fort Richardson state Alaska 99505

6. Representation in Existing Surveys

title None has this property been determined eligible? ___ yes X no

date ___ federal ___ state ___ county ___ local

depository for survey records

city, town state

7. Description

Condition		Check one	Check one
_X_ excellent	___ deteriorated	___ unaltered	_X original site
___ good	___ ruins	_X_ altered	___ moved date _____
___ fair	___ unexposed		

Describe the present and original (if known) physical appearance

Construction at Ladd Field, the first U.S. Army airfield in Alaska, began in the fall of 1938. Named in honor of Maj. Arthur K. Ladd, killed in an aircraft accident in South Carolina in 1935, it was built just east of Fairbanks, Alaska. The first Army Air Corps troops arrived at the field in April 1940. Its World War II facilities were designed to fulfill three missions: cold weather experimental station, air depot for repair and testing of aircraft, and the principal base in Alaska for the Air Transport Command.

Today, it is an army installation, Fort Wainwright, and facilities have greatly expanded with the erection of modern barracks, family housing, medical center, administrative centers, and other structures. The core of the original field, including the permanent garrison, hangars, and runways, remains relatively intact and is maintained in good condition. Both the U.S. Army and the Bureau of Land Management make use of these structures, but a few buildings are presently unoccupied. Several features of wartime activities that were located around the periphery of the field are no longer extant: a temporary 500-man transient camp for Russian and American aircrews; Coast Artillery (antiaircraft) garrison area; air depot and troop housing area; and Quartermaster Corps housing. A satellite runway, 26 miles to the southeast (and called "Mile 26 Field") is now fully developed Eielson Air Force Base.

Permanent Garrison. The first thing to be built at the new site was a three-mile spur of The Alaska Railroad from Fairbanks to deliver construction material. This spur exists and is maintained in good condition. Because of the extremely cold winters in Interior Alaska, all structures for the original garrison were permanent in nature. Officers' quarters are arranged in a horseshoe, centered on an open lawn. Three of these (1047, 1049, and 1051) are frame, two-story, apartment-type quarters and date from 1941. A similar-type structure (1045) was the early administrative center and is now a guest house. Next to it, but dating from 1945, is an attractive-appearing automobile garage. In the center of the horseshoe is Quarters No. 1, the commanding officer's house. This handsome, two-story, frame structure, surrounded by a white picket fence and a ring of trees, was the envy of all army officers in Alaska, both higher and lower rank than the occupant.

The horseshoe is today surrounded by many more sets of quarters of later construction, but among them are three from the early 1940s: nurses' quarters (1021), east of the guest house, a one-story, frame building constructed before 1943 (but carried in the records today as dating from 1946) and presently vacant; radio station (1024), one-story, frame, cottage-type building pre-dating 1943, although current records date it from 1945 (local tradition holds this building to have been the residence of the head of the Russian mission at Ladd, but no supporting evidence has yet been found); and a standard-plan military chapel, constructed in 1944.

The legs of the horseshoe and the open space between them extend southward, across a street into the industrial area. This open space no longer has a flag staff but a monument to Lt. Gen. Jonathan M. Wainwright has been emplaced

there. East of this former parade ground is a large, U-shaped, two-story post hospital (1555), constructed during a major expansion in 1943. In later years, this structure served as post headquarters; today, it houses the Bureau of Land Management's Alaska Fire Service. East of the hospital is a former aircraft maintenance shop (1541), now an addition to a large Bureau of Land Management administration/visitor center building. While present-day building records state the shop was built in 1942, a 1943 army map does not show it.

West of the parade are three wartime structures: A two-story building with a one-story wing at each end (a long ell at the rear no longer exists); the wartime function of this building (1562) was possibly administrative while today it is called Kluge Hall and contains administrative offices and a thrift shop. South of it stands the all-important wartime power and heating plant (1561), not presently in operation. Next to the plant is[1] a wartime community center (1560), constructed in 1941 and enlarged in 1943.

Many of the first buildings at Ladd retain their original, and distinctive, copper roofs. Another unusual feature was a network of underground utilities corridors. Those corridors in the vicinity of the officers' quarters, parade ground, and Hangar No. 1 are of sufficient size (7 by 9 feet) to allow persons to walk underground during cold winter weather.

Airfield

South of the industrial area, the airfield proper begins. Adjacent to the parade is the huge, metal-clad Hangar No. 1, the first to be completed at Ladd, in 1941. On its north and south sides are two-story "lean-tos" containing offices and shops. This imposing hangar is now vacant. East, west, and south of the hangar are extensive concrete or earthen aircraft parking areas where, later, planes destined for the Soviet Union received final preparation. Beyond them is the first of two parallel runways at Ladd Field. In 1941, this reinforced-concrete runway was 5,000 feet in length. By 1943, gravel extensions had been laid at each end, giving a total length of over 9,000 feet. These extensions were later paved. Also in 1943, the second, paved runway, 9,000 by 150 feet, as well as additional parking areas, taxiways, and hardstands were under construction. Two Kodiak, T-type hangars (1542 and 1543) were erected at the end of the parking area east of Hangar No. 1. Said to have been used only by the cold weather test station, these hangars have

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1. Today's army building records state it was originally a community center. The writer feels uneasy about the term which was not in common use at the time and because of the building's location--between the power plant and a hangar.

been permitted to the Bureau of Land Management for fire suppression activities.[2]

In the 1943 expansion program for Ladd, three Birchwood-type hangars were authorized for the south side of the enlarged field. These nearly-identical structures are extant, but their locations are somewhat different than originally planned: Hangar No. 2 (3008), Hangar No. 3 (3005), and Hangar No. 6 (2085). They were completed ca. 1944. All three have been modernized and are in excellent condition. Today, they house army helicopters. Also on the south side of the field are two sets of double hangars, Nos. 4 and 5 (2106) and 7 and 8 (2077) that were erected at the same time. Considering the many changes in missions over the past 45 years, the overall integrity of the original Ladd field structures is remarkable.

The significant historical features at former Ladd Field are:

Officers' quarters on the horseshoe, nos. 1047, 1049, and 1051; also, the commanding officer's quarters, no. 1.

Early administrative center (present guest house), no. 1045.

Automobile garage, no. 10.

Former nurses' quarters, no. 1021.

Radio station, no. 1024.

Former post hospital, no. 1555.

Former aircraft maintenance shop, no. 1541.

Strcuture no. 1562 (Kluge Hall).

Former power and heating plant, no. 1561.

Former "community center," no. 1560.

Hangar no. 1.

Two parallel runways, including parking areas, taxiways, and hardstands.

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2. Both hangars were surveyed in 1980 for possible demolition.

Two Kodiak hangars, nos. 1542 and 1543.

Three Birchwood hangars, nos. 3008, 3005, and 2085.

Two double hangars, nos. 2106 and 2077.

Chapel, no. 1043.

8. Significance

Period	Areas of Significance—Check and justify below			
___ prehistoric	___ archeology-prehistoric	___ community planning	___ landscape architecture	___ religion
___ 1400–1499	___ archeology-historic	___ conservation	___ law	___ science
___ 1500–1599	___ agriculture	___ economics	___ literature	___ sculpture
___ 1600–1699	___ architecture	___ education	X military	___ social/ humanitarian
___ 1700–1799	___ art	___ engineering	___ music	___ theater
___ 1800–1899	___ commerce	___ exploration settlement	___ philosophy	___ transportation
X 1900–	___ communications	___ industry	___ politics government	___ other (specify)
		___ invention		

Specific dates 1938-1945 **Builder Architect**

Statement of Significance (in one paragraph)

Ladd Field was established in 1940 originally as a Cold Weather Test Station at the insistance of Maj. Gen. H.H. Arnold, Chief of the Army Air Corps. Here, at Alaska's first army airfield, vital lessons were learned in wing-icing, navigation, aircraft maintenance and operation, instruments and controls, radio communication, cold-weather clothing, armament, and a wide variety of other investigations for operating aircraft in arctic-like conditions. As the Japanese prepared to invade the Aleutians in 1942, the Eleventh Air Force established an Air Depot at Ladd Field for the repair, testing, and supply of aircraft in the Alaska Theater. And, beginning in 1942, Ladd Field became the center of the "Alsib [Alaska/Siberia] Movement," wherein nearly 8,000 military aircraft from the United States were transferred to Russian aircrews for use on the Russian Front. Despite Alaska's cruel winters this air ferry route came to be preferred over the longer Miami-Iraq-Moscow route. Soviet diplomats and missions also traveled through Ladd Field during the war en route to and from the Soviet Union and the United States.

Cold Weather Test Station

Well before he became chief of the Army Air Corps, Maj. Gen. H.H. ("Hap") Arnold recognized the importance of establishing a cold weather test station in Alaska to experiment in adapting planes, personnel, equipment, and base facilities to operate successfully in deep cold temperatures such as are experienced in Interior Alaska. As chief, he persuaded the War Department to complete a site survey in the summer of 1938. A site was chosen 3½ miles east of Fairbanks (postwar growth has brought city development up to the base's boundary) and by autumn the Quartermaster Corps had begun construction with a civilian crew that eventually grew to 1,200 men.

An early experiment concerned how best to construct a 5,000-foot runway that would not heave in freezing and thawing conditions. A promising solution was to remove two feet of topsoil then put in one foot of unwashed gravel. Concrete, reinforced with steel, was poured over this base. (Local citizens persuaded the Army to use thawing techniques rather than attempting to blast the frozen tundra.) This method proved quite successful, although the runways have been upgraded and reconstructed in the subsequent 45 years.

The first Air Corps troops arrived at Ladd Field in September 1940, and soon the first B-17 Flying Fortress arrived for experimental work. The power and heating plant was completed during the winter of 1940-44, bringing heat and cheerful light to the still unfinished barracks and quarters. In January 1941, the Corps of Engineers took over construction and the forceful Col. B.B. Talley, CE, drove the work to completion. At the same time, Coast Artillery antiaircraft units arrived to winter test their weapons. Cold weather testing

continued at Ladd Field until the spring of 1942 when concern over a Japanese invasion caused the Alaska Department to request the testing be halted. The Eleventh Air Force took over the field and established an air depot for aircraft repair, service, and supply for the Alaskan Theater.

Within a few months, however, the commanding general of the Army Air Forces directed the reestablishment of cold weather testing, this time keeping the activity directly under himself. (Even earlier, Ladd Field had been fairly independent of the Alaska Department. One result of this was the envy of other units in Alaska over the high degree of refinement that went into Ladd's facilities. Most other installations were making do with tents and quonset huts.) Testing operations resumed, to be continued until well after the conclusion of World War II. A typical report summarized activity for the winter of 1942-43: "In addition to aircraft accessory equipment, tests and experiments were carried out in connection with clothing, food, motor transportation, medical research, photography and the many and varied factors in connection with Arctic operations."[1]

Air Depot

The establishment of the Air Depot at Ladd in 1942 resulted in the addition of nearly 1,000 officers and men to the garrison. Depot activities, combined with those of the Air Transport Command, resulted in the extension of the existing runway, construction of a second, and the building of additional hangars and housing. Then, with the freeing of the western Aleutians from the enemy a year later, the size of the Eleventh Air Force decreased considerably, resulting in less work for the depot. At the same time, the Air Transport Command was increasing its work load and, having taken command of Ladd Field, had the Sixth Air Depot Group disbanded and absorbed the personnel into its own activities.

The Russians Are Coming

The United States and the Soviet Union had discussed the concept of ferrying American-manufactured aircraft to Russia under a lend-lease program even before Pearl Harbor. In August 1941, the two nations reached an agreement in principle on the plan. Two routes were feasible: from Florida to North Africa, to Iraq and Iran, and on to Moscow, for a distance of 13,000 miles; and from Great Falls, Montana, to Fairbanks, to Siberia, and on to Moscow, for a

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1. Alaska Defense Command, History of Ladd Field, 1938-44, "AAF Cold Weather Testing Detachment," p. 54. Record Group 338, Alaska Defense Command, Washington National Records Center, Suitland, MD.

distance of 7,900 miles. The Russians[2] were not enthusiastic about the Siberian route but, in July 1942, Premier Joseph Stalin accepted this plan.

Canadians were already building airfields in the wilderness between Edmonton, Alberta, and Whitehorse, Yukon Territory. These together with six fields in Central Alaska--Northway, Tanacross, Big Delta, Ladd, Galena, and Nome--became the Northwest Staging Route for the delivery of the aircraft. At first, the United States wanted to turn over the planes to Russian aircrews in Siberia. Stalin, however, wishing to avoid an appearance of collaboration in the Far East, suggested that Soviet flyers accept the planes in Alaska, perhaps at Nome. Agreement was soon reached that Ladd Field would be the delivery point and that the Russians would land at Nome for refueling and repairs before crossing Bering Strait.[3]

The U.S. Army Air Corps Ferrying Command had its origins in delivery of American aircraft to Great Britain. Early in 1942 it expanded operations by flying bombers to the South Pacific. Renamed the Air Transport Command (ATC) in June 1942, it directed its Seventh Ferrying Group to deliver the first planes to Alaska. Five A-20 Havoc attack bombers landed at Ladd Field on September 3, 1942. Next day, officers of the permanent Russian mission flew in from Siberia. On September 11, 22 P-40 fighters arrived from Montana. Finally, a contingent of Russian pilots landed at Ladd on September 24 to begin five days of transitional training before flying the new planes home.

Americans found the Russians difficult students at first. The language barrier was only part of the problem. Some planes were too small for two men and the Americans gave instructions on the ground then watched nervously as the Russians took to the air. Also, the Russians appeared to have orders not to fraternize too much with American officers and not at all with American women (photographs of Russians at American dances suggest that any such orders were later relaxed). For the most part, the Russians were polite, well-behaved, and under strict discipline. In the beginning, they complained some about the quality of American planes, perhaps suspicious of products from a capitalist country. (Some Russians may have had a capitalistic heart; it is reported that few planes reached Siberia without a cargo of silk stockings, cosmetics, fishing tackle, cigarettes, or toys.) With the passage of time,

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2. During World War II, Americans preferred the terms "Russia" and "Russians" over "Soviet Union" and Soviets."

3. Galena Field, between Fairbanks and Nome, was an alternate jumping-off point for Siberia or for emergency landings.

however, differences smoothed out and, by 1944, Russia was favorably impressed with the quality and quantity of American aircraft. Soviet flyers and mechanics had free run of Ladd Field and, after the severely cold winter of 1942-43 that was made worse by inadequate facilities, took over many of the new hangars and shops erected in 1943.

The Alsib route witnessed the comings and goings of more than air crews. As early as September 1941, Corps of Engineers Col. B.B. Talley, flying to Nome on an inspection trip, spotted two large (American-made) Russian seaplanes in a lagoon twenty miles east of Nome. That night he met the Russians--a general and 42 staff members--who were en route to the United States on a military mission.[4] Throughout the war, Ladd Field played host to many dignitaries from both nations, including Ambassador Andrei Gromyko and Foreign Minister V.M. Molotov from the Soviet Union, and Wendell L. Wilkie and Vice President Henry A. Wallace of the United States.

The Air Transport Command took over Ladd Field in October 1943, having already assumed command of Galena, Big Delta, Tanacross, and Northway. In March 1944 alone the amount of air freight handled at Ladd amounted to 586 tons, and 288 planes were delivered to Russia. By September 1945, when the Russian mission left Alaska, 7,930 aircraft had been delivered to the Soviets by way of the Alsib Movement.

On November 1, 1945, the Air Transport Command transfered Ladd Field back to the Eleventh Air force. Fifteen years later, on January 1, 1961, the Department of the Air Force transferred Ladd Air Force Base to the Department of the Army. The Department renamed the now historic field Fort Jonathan M. Wainwright, for the hero of Corregidor.

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4. B.B. Talley, Daily Log, 1941-1943, entry for September 1, 1941.

9. Major Bibliographical References

See separate sheet.

10. Geographical Data

Acreage of nominated property 1,010 acres

Quadrangle name Fairbanks (D-2)

Quadrangle scale 1:250,000

UTM References

	Zone	Easting	Northing
A	03	472400	7191300
B	03	472400	7189500
C	03	469400	7189500
D	03	469400	7191300
E			
F			
G			
H			

Verbal boundary description and justification

See separate sheet.

List all states and counties for properties overlapping state or county boundaries

state	code	county	code
state	code	county	code

11. Form Prepared By

name/title	Erwin N. Thompson, Historian		
organization	Denver Service Center, NPS	date	April 18, 1984
street & number	755 Parfet Street	telephone	(303) 234-4509
city or town	Lakewood	state	Colorado 80225

12. State Historic Preservation Officer Certification

The evaluated significance of this property within the state is:

___ national ___ state ___ local

As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the National Park Service.

State Historic Preservation Officer signature

title date

For NPS use only

I hereby certify that this property is included in the National Register

date

Keeper of the National Register

Attest: date

Chief of Registration

U.S. GOVERNMENT PRINTING OFFICE : 1983 O - 419-311

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Appendix D. Glossary of Commonly Used Terms

Adverse effects are those effects of an undertaking that may alter, directly or indirectly, any of the characteristics of a historic property that qualify the historic property for inclusion in the National Register in a manner that would diminish the integrity of the historic property's location, design, setting, materials, workmanship, feeling, or association. The criteria of adverse effect also require consideration of all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the historic property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Archaeological resource means any material remains of human life or activities that are of archeological interest.

Archeological interest means capable of providing scientific or humanistic understandings of past human behavior, cultural adaptation, and related topics through the application of scientific or scholarly techniques such as controlled observation, contextual measurement, controlled collection, analysis, interpretation, and explanation. Material remains means physical evidence of human habitation, occupation, use, or activity, including site, location, or context in which such evidence is situated.

Area of potential effect means the geographic area or areas within which an undertaking may directly cause changes in the character or use of historic properties, if any such historic properties exist. The area of potential effect is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Building means a construction (e.g., house, hotel, church, etc.) created principally to shelter any form of human activity. Building may also be used to refer to a historically and functionally related unit, such as a courthouse and jail.

Consulting parties are those parties that have a consultative role in the Section 106 process; these parties, for the purposes for the implementation of USAG FWA's ICRMP, are the SHPO, federally-recognized Indian tribes, representatives of local governments, and applicants for federal permits, licenses, assistance or other forms of federal approval. Members of the public may participate as consulting parties upon the invitation of the Garrison Commander.

Consultation means the formal process of seeking, discussing, identifying and considering the views of consulting parties. For purposes of this ICRMP, consultation with federally-recognized Indian tribes means consultation on a government-to-government basis as defined below.

Coordination, for the purposes of cultural resources management, means the informal communication and exchange of information and ideas between consulting parties concerning historic preservation issues affecting USAG FWA. Coordination is intended to be an informal process, on a staff-to-staff basis, for routine management issues as distinguished from the formal consultation and tribal consultation processes.

Cultural Resource is a general term for physical remnants of the past that are valued by and are important to a community of people. It can be referring to a historic property as defined in National Historic Preservation Act; a cultural item as defined in National Archeological Grave Protection and Repatriation Act or by a federally-recognized Indian tribe; an archeological resources as defined in the Archeological Resources Protection Act; a sacred sites as defined in Executive Order 13007 to which

access is provided under the American Indian Religious Freedom Act; or collections as defined in *Curation of Federally-Owned and Administered Collections* (36 CFR § 79).

Cultural Resources Manager means the individual designated by the Garrison Commander, in accordance with AR 200-1, to coordinate the Section 106 responsibilities. The Garrison Commander will ensure that the Cultural Resources Manager has appropriate knowledge, skills, and professional training and education to carry out installation cultural resources management responsibilities. The Cultural Resources Manager will ensure that all historic properties technical work, including identification and evaluation of historic properties, assessment and treatment of effects, and preparation of the ICRMP, is conducted by individuals who meet the applicable standards within *The Secretary of the Interior's Professional Qualification Standards*.

Disposal means any authorized method of permanently divesting the Department of the Army of control of and responsibility for real estate.

District means a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.

Effect means alteration to the characteristics of a historic property that qualify it for inclusion in or make it eligible for inclusion in the National Register.

Environmental Assessment (EA) is the NEPA term used for the documentation used to assist agency planning and decision-making. It is required to assess environmental impacts and evaluate their significance and is routinely used as a planning document to evaluate environmental impacts, develop alternatives and mitigation measures, and allow for agency and public participation.

Environmental Impact Statement (EIS) is a NEPA term referring to a detailed written statement required under NEPA for major federal actions significantly affecting the quality of the human environment.

Federally-recognized Indian Tribe, for the purposes of the ICRMP means: (i) an American Indian tribe, band, nation, pueblo, village or community within the continental United States presently acknowledged by the Secretary of the Interior to exist as an American Indian tribe pursuant to the Federally-Recognized Indian Tribe List Act, Public Law 103-454; and (ii) Regional Corporations or Village Corporations, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act (43 USC. 1602), which are recognized as eligible for the special programs and services provided by the United States to Indians because of their status as American Indians.

The **Garrison Commander**, an Army colonel, the Garrison Commander is charged with providing Base Operations Support to all activities and personnel on the POM. The Garrison Commander directs, oversees, and coordinates garrison staff.

Government-to-government relations, for the purposed of this document, means relations formally established between USAG FWA and federally-recognized Indian tribes through their respective governmental structures. In recognition of a federally-recognized American Indian tribe's status as a sovereign nation, formal government-to-government relations are established and maintained directly between Garrison Commanders and the heads of tribal governments. In accordance with AR 200-4, the Garrison Commander will initiate government-to-government relations with federally-recognized American Indian tribes by means of formal, written communication to the heads of tribal governments.

Such letters should designate an installation official who is authorized to conduct follow-on consultations with the tribe's designated representative. The Garrison Commander is encouraged to meet face-to-face with the heads of tribal governments as part of the process to initiate government-to-government consultation. The final decision on USAG FWA's ICRMP, which has been subject of government-to-government consultation, will be formally transmitted from the Garrison Commander to the head of the tribal government.

Historic preservation includes identification, evaluation, recordation, documentation, curation, acquisition, protection, management, rehabilitation, restoration, stabilization, maintenance, research, interpretation, conservation, and education and training regarding the foregoing activities or any combination of the foregoing activities.

Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. The term includes artifacts, records, and remains that are related to and located within such properties. The term includes historic properties of traditional religious and cultural importance to federally-recognized American Indian tribes. The term "eligible for inclusion in the National Register" includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.

Historic property type refers to the kind of resource being documented, recorded, or evaluated. Types of historic properties include buildings (churches, forts, libraries, post offices, etc.), structures (bridges, canals, earthworks, etc.), objects (automobiles, boundary markers, fountains, sculptures, etc.), and districts (collections of buildings, structures, and objects unified by a common theme).

If feasible refers to taking financial and economic considerations into account when evaluating the effect a proposed undertaking will have on a historic property.

Improvements mean an addition to land amounting to more than repair or replacement and costing labor or capital (e.g., buildings, pavements, pipelines, and other structures more or less permanently attached to the land).

In-grants means real property acquired for Army use by lease, license, or permit.

Installation means a grouping of facilities located in the same vicinity, which are under control of the Army and used by Army organizations. This includes land and improvements. In addition to those used primarily by Soldiers, the term "installation" applies to real properties such as depots, arsenals, ammunition plants (both contractor and government operated), hospitals, terminals, and other special mission installations. The term may also be applied to a state or region in which the Army maintains facilities. For example, the Army National Guard may consider National Guard facilities within a state to be one installation and the U.S. Army Reserve may consider Regional Support Centers to be installations. The Garrison Commander is the individual responsible for management and operation of the installation.

Integrated Cultural Resources Management Plan (ICRMP) is a five-year plan developed and implemented by a Garrison Commander to provide for the management of cultural resources in way that maximizes beneficial effects on such resources and minimizes adverse effects and impacts without impeding the mission of the Army.

Keeper of the National Register of Historic Places means the individual who has been delegated the authority by NPS to list properties and determine their eligibility for the National Register of Historic Places. The Keeper may further delegate this authority as he or she deems appropriate.

Layaway means to hold for future sale. In real estate terms, layaway refers to setting aside property for sale in the future. Usually, terms and conditions are placed on the sale prior to its purchase by another federal agency or outside organization.

Memorandum of Agreement refers to an agreement document that outlines a federal agency's planned actions to avoid, minimize, and mitigate an adverse effect to a historic property.

Mitigation refers to actions taken to reduce, minimize, or alleviate adverse effects caused by a federal undertaking.

Mothballing refers to the act of temporarily securing a building or structure and its component features to reduce vandalism or break-ins. When a building or structure is mothballed, adequate ventilation to the interior should be provided, and utilities and mechanical systems modified or secured. The process also entails stabilizing the building or structure, exterminating or controlling pests, and protecting the exterior from moisture penetration. A plan for maintaining and monitoring the building or structure should be developed and implemented.

National Historic Landmark (NHL) means a historic property that the Secretary of the Interior has designated a National Historic Landmark pursuant to the Historic Sites Act of 1935, Public Law 100-17. NHLs are places where significant historical events have occurred, where prominent Americans worked or lived, that represent those ideas that shaped the nation, that provide important information about our past, or that are outstanding examples of design or construction.

National Register of Historic Places Criteria means the criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register of Historic Places (36 CFR § 60).

Native Liaison is the individual designated by the Garrison Commander to facilitate the government-to-government relationship with federally-recognized Indian tribes. The Garrison Commander will ensure that the Native Liaison has appropriate knowledge, skills, and professional training and education to conduct installation consultation responsibilities with federally-recognized American Indian and Alaska Native tribes. The Native Liaison is also responsible, when designated, to carry out staff-to-staff consultation actions with federally-recognized Indian tribes. The Native Liaison will have access to the installation command staff in order to facilitate direct government-to-government consultation.

NEPA process means the decision-making process established by the National Environmental Policy Act as implemented by the regulations published by the Council on Environmental Quality and AR 200-2. The NEPA process involves preparation of a NEPA document, a Record of Environmental Consideration, an Environmental Assessment or an Environmental Impact Statement, followed by a decision document. An EA usually results in either a Finding of No Significant Impact or Notice of Intent to prepare an EIS. An EIS results in a Record of Decision.

Object is a term to distinguish from buildings and structures those constructions (e.g., fountains, monuments, sculptures, etc.) that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Planning level survey describes the status of completion of the inventory of historic properties that are known or may be expected to be present on the installation. The planning level survey is based on a review of existing literature, records, and data.

Professional standards mean, for the purposes of (this document), those standards set forth in *The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (48 FR 44716), which apply to individuals conducting technical work for the Army. Tribal members are uniquely qualified to identify and assist in the evaluation, assessment of effect, and treatment of historic properties to which they attach traditional religious and cultural importance. When the Army requests assistance from federally-recognized American Indian tribes to aid in the identification, evaluation, assessment of effects and treatment of historic properties of traditional religious and cultural importance, such tribal members need not meet *The Secretary of the Interior's Professional Qualifications Standards*.

Properties of Traditional Religious and Cultural Importance are properties that are associated with the traditions, beliefs, practices, life ways, arts, crafts, and social institutions of an Indian tribe.

Real estate means real property owned by the United States and under the control of the Army. It includes the land, right, title, and interest therein and improvements thereon. The land includes minerals in their cultural state and standing timber; when severed from the land, there become personal property. Right and interest include leaseholds, easements, rights-of-way, water rights, air rights, and rights to lateral and subjacent support. Installed building equipment is considered real estate until severed. Equipment in place is considered personal property.

Record of Environmental Consideration (REC) is a signed statement, required under AR 200-2, submitted with the documentation that briefly documents that an Army undertaking has received environmental/cultural review that briefly describes the proposed action and timeframe and identifies the proponent and approving official(s). The REC provides sufficient documentation to enable a decision. Comments, which result from the review of the REC, are compiled into a decision; the approved guidance for the undertaking is then provided to the proponent.

Rehabilitation is defined as the act or process of making possible a compatible use for a historic property through repair, alterations, and additions while preserving those portions or features that convey its historical or cultural values.

Restoration is defined as the act or process of accurately depicting the form, features, and character of a historic property as it appeared at a particular period of time by means of removal of features from other periods of its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make historic properties functional is appropriate within a restoration project.

Review and monitoring means an informal process in which an installation will coordinate with consulting parties to discuss proposed undertakings for the upcoming year, results of plan implementation during the previous year, the overall effectiveness of the installation's ICRMP, and the need for making amendments to it. At a minimum, this review and monitoring will be conducted annually.

Site is a location of significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

Sovereignty, with respect to federally-recognized American Indian tribes, means the exercise of inherent powers of self-governance and self-determination over their members and territories.

Standard Operating Procedures are the step-by-step methods USAG FWA will follow when managing historic properties affected by installation undertakings. These are based on the goals, management practices, and historic preservation standards.

State Historic Preservation Officer (SHPO) means the official appointed or designated pursuant to Section 101 (b) (1) of NHPA of 1966, as amended, to administer the state historic preservation program or representative designated to act for the State Historic Preservation Officer.

Streamlined Activities refers to USAG FWA's undertakings the meet the criteria set forth in the Operation and Maintenance Programmatic Agreement. USAG FWA does not individually consult with SHPO on these undertakings as they have little to no potential to adversely affect historic properties.

Surface Danger Zone means the area designated on the ground of a training complex (to include associated safety areas) for the vertical and lateral containment of projectiles, fragments, debris, and components resulting from the firing of detonation of weapon systems to include exploded and unexploded ordnance.

Transfer means the change of jurisdiction over real property from one federal agency or department to another, including military departments and defense agencies.

Traditional Cultural Property is generally defined as a property type that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that are rooted in the community's history and are important in maintaining the continuing cultural identity of the community.

Tribal consultation means seeking, discussing, identifying and considering tribal views through good faith dialogue with federally-recognized Alaska Native tribes on a government-to-government basis in recognition of the unique relationship between federal and tribal governments and the status of federally-recognized Alaska Native tribes as sovereign nations (see government-to-government relations.)

Treatment plans provide guidance on maintenance, repair, rehabilitation, restoration, and preservation of historic properties. The plans are based on *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Undertaking means a project, activity, or program that is funded in whole or in part under the direct or indirect jurisdiction of the Army, including those carried out by or on behalf of the Army, those carried out in whole or in part with Army funds, and those requiring Army approval.

V**iew shed** refers to the visual and spatial relationship between the historic property and the surrounding area. It refers to the area on the ground that is visible from a specific location or locations. A view shed can also refer to the view into and out of a neighborhood, and the view created by a landscape.

Appendix E. List of Commonly Used Acronyms

ACHP	Advisory Council on Historic Preservation
AEC	Army Environmental Command
AHRS	Alaska Heritage Resources Survey
APE	Area of Potential Effect
ARPA	Archaeological Resources Protection Act
BLM	Bureau of Land Management
CA	Cooperative Agreement
CFR	Code of Federal Regulations
DoD	Department of Defense
DOE	Determination of Eligibility
DPW	Directorate of Public Works
DTA	Donnelly Training Area
EA	Environmental Assessment
EIS	Environmental Impact Statement
GIS	Geographic Information System
GRTA	Gerstle River Training Area
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HQDA	Headquarters, Department of the Army
ICRMP	Integrated Cultural Resources Management Plan
IMCOM	Installation Management Command
ITAM	Integrated Training Area Management
LRAM	Land Rehabilitation and Maintenance
MILCON	Military Construction
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NPS	National Park Service
National Register	National Register of Historic Places
OHA	Office of History and Archaeology
O&M PA	Operations and Maintenance Programmatic Agreement
PA	Programmatic Agreement
REC	Record of Decision
SDZ	Surface Danger Zones
SHPO	State Historic Preservation Officer
TFTA	Tanana Flats Training Area
USACE	U.S. Army Corps of Engineers
USAF	U.S. Air Force
USARAK	U.S. Army, Alaska
USAG FW	U.S. Army Garrison, Fort Wainwright
USARPAC	U.S. Army, Pacific
YTA	Yukon Training Area

Appendix F. List of Archaeological Sites

Current List of Archaeological Sites on USAG FWA-Managed Lands			
AHRS Number	**Site Location**	**NRHP Status**	**Historic/Prehistoric**
FAI-0040	Cantonment	not evaluated	Prehistoric
FAI-0041	Cantonment	not evaluated	Prehistoric
FAI-0042	Cantonment	not evaluated	Prehistoric
FAI-0043	Cantonment	not evaluated	Prehistoric
FAI-0044	TFTA	eligible	Prehistoric
FAI-0045	TFTA	eligible	Prehistoric
FAI-0046	TFTA	eligible	Historic
FAI-0047	TFTA	not evaluated	Prehistoric
FAI-0048	TFTA	eligible	Prehistoric
FAI-0049	TFTA	eligible	Prehistoric
FAI-0050	TFTA	not evaluated	Prehistoric
FAI-0051	TFTA	not evaluated	Prehistoric
FAI-0052	TFTA	not evaluated	Prehistoric
FAI-0053	TFTA	not evaluated	Prehistoric
FAI-0054	TFTA	eligible	Historic
FAI-0055	TFTA	not evaluated	Prehistoric
FAI-0056	TFTA	not evaluated	Prehistoric
FAI-0057	TFTA	not evaluated	Historic
FAI-0058	TFTA	not evaluated	Historic
FAI-0059	TFTA	not evaluated	Prehistoric
FAI-0060	TFTA	not evaluated	Prehistoric
FAI-0086	TFTA	not evaluated	Prehistoric
FAI-0087	TFTA	not evaluated	Prehistoric
FAI-0088	TFTA	not evaluated	Prehistoric
FAI-0165	YTA	not evaluated	Prehistoric
FAI-0170	TFTA	not evaluated	Prehistoric
FAI-0171	TFTA	not evaluated	Prehistoric
FAI-0172	TFTA	not evaluated	Prehistoric
FAI-0173	TFTA	not evaluated	Prehistoric
FAI-0174	TFTA	not evaluated	Prehistoric
FAI-0175	TFTA	not evaluated	Prehistoric
FAI-0176	TFTA	not evaluated	Prehistoric
FAI-0177	TFTA	not evaluated	Prehistoric
FAI-0178	TFTA	not evaluated	Prehistoric

FAI-0179	TFTA	not evaluated	Prehistoric
FAI-0180	TFTA	not evaluated	Prehistoric
FAI-0181	TFTA	not evaluated	Prehistoric
FAI-0182	TFTA	not evaluated	Prehistoric
FAI-0183	TFTA	not evaluated	Prehistoric
FAI-0184	TFTA	not evaluated	Prehistoric
FAI-0185	TFTA	not evaluated	Prehistoric
FAI-0186	TFTA	not evaluated	Prehistoric
FAI-0187	TFTA	not evaluated	Prehistoric
FAI-0188	TFTA	not evaluated	Prehistoric
FAI-0189	TFTA	not evaluated	Prehistoric
FAI-0190	TFTA	not evaluated	Prehistoric
FAI-0191	TFTA	not evaluated	Prehistoric
FAI-0192	TFTA	not evaluated	Prehistoric
FAI-0193	TFTA	not evaluated	Prehistoric
FAI-0194	TFTA	eligible	Prehistoric
FAI-0195	TFTA	eligible	Prehistoric
FAI-0196	TFTA	eligible	Prehistoric
FAI-0197	TFTA	eligible	Prehistoric
FAI-0198	TFTA	eligible	Prehistoric
FAI-0199	Cantonment	not evaluated	Prehistoric
FAI-0200	Cantonment	not evaluated	Prehistoric
FAI-0243	TFTA	not evaluated	Prehistoric
FAI-0335 Blair Lakes District	TFTA	eligible	Prehistoric
FAI-0336 Clear Creek Buttes District	TFTA	eligible	Prehistoric
FAI-0337 Wood River Buttes District	TFTA	eligible	Prehistoric
FAI-0391	TFTA	not evaluated	Historic
FAI-0423	TFTA	not evaluated	Historic
FAI-0509	Cantonment	not evaluated	Prehistoric
FAI-1356	TFTA	not evaluated	Prehistoric
FAI-1357	TFTA	not evaluated	Prehistoric
FAI-1556	YTA	not evaluated	Prehistoric
FAI-1885	TFTA	not evaluated	Prehistoric
FAI-1886	TFTA	not evaluated	Prehistoric
FAI-1887	TFTA	not evaluated	Prehistoric
FAI-1888	TFTA	not evaluated	Prehistoric
FAI-1889	TFTA	not evaluated	Prehistoric
FAI-1990	Cantonment	not evaluated	Prehistoric

FAI-1998	TFTA	not evaluated	Prehistoric
FAI-2001	TFTA	not evaluated	Prehistoric
FAI-2002	TFTA	not evaluated	Prehistoric
FAI-2003	TFTA	not evaluated	Prehistoric
FAI-2004	TFTA	not evaluated	Prehistoric
FAI-2005	TFTA	not evaluated	Prehistoric
FAI-2006	TFTA	not evaluated	Prehistoric
FAI-2007	TFTA	not evaluated	Prehistoric
FAI-2008	TFTA	not evaluated	Prehistoric
FAI-2009	TFTA	not evaluated	Prehistoric
FAI-2010	TFTA	not evaluated	Prehistoric
FAI-2011	TFTA	not evaluated	Prehistoric
FAI-2012	TFTA	not evaluated	Prehistoric
FAI-2013	TFTA	not evaluated	Prehistoric
FAI-2014	TFTA	not evaluated	Prehistoric
FAI-2015	TFTA	not evaluated	Prehistoric
FAI-2016	TFTA	not evaluated	Prehistoric
FAI-2018	TFTA	not evaluated	Prehistoric
FAI-2019	TFTA	not evaluated	Prehistoric
FAI-2020	TFTA	not evaluated	Prehistoric
FAI-2021	TFTA	not evaluated	Prehistoric
FAI-2022	TFTA	not evaluated	Prehistoric
FAI-2023	TFTA	not evaluated	Prehistoric
FAI-2024	TFTA	not evaluated	Prehistoric
FAI-2025	TFTA	not evaluated	Prehistoric
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XMH-1460	DTA East	not evaluated	Prehistoric
XMH-1487	DTA East	not evaluated	Prehistoric

Appendix G. Bibliography of Reports on USAG FWA-Managed Lands

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Appendix H. Government-To-Government and Tribal Consultation

U.S. Army Garrison Fort Wainwright Standard Operating Procedures: Government-to-Government Consultation and Tribal Coordination

Purpose:
To establish agency Standard Operating Procedures (SOP) for conducting government-to-government consultation and coordination between the U.S. Army Garrison Fort Wainwright Alaska (USAG FWA) and Alaska Native federally recognized tribes.

Background:
The foremost principle of United States Indian law is the *trust* doctrine. Tribes are recognized as *domestic dependent nations* with inherent sovereignty over their own affairs. Due to the unique historical relationship between these domestic dependent nations and the federal government, the government accepts certain trust responsibilities for the tribes, including the protection of tribal rights and resources. There are 229 of the nation's 566 federally recognized tribes in Alaska. These political entities, according to federal policy, must be engaged on a government-to-government basis.

With the issuance of Executive Order (EO) 13084: *Consultation and Coordination with Indian Tribal Governments* (14 May 1998), superceded by EO 13175: *Consultation and Coordination with Indian Tribal Governments* (6 November 2000), the President acknowledged the Federal government's trust responsibility and recognized the right of Native American tribes to self-governance / self-determination, while outlining the federal government's support for tribal sovereignty through government-to-government interactions. It required federal agencies to respect these principles through the promotion of meaningful and timely consultation with federally recognized tribes during the development of agency projects and policies.

The *Department of Defense American Indian and Alaska Native Policy* (DoD AI/AN), signed on 20 October 1998, outlined DoD's support of and approach to these principles and emphasized the responsibility of personnel toward these ends, the importance of understanding and addressing tribal concerns, and the input tribes should have on agency policies that may affect protected tribal resources, tribal rights, or Indian lands.

Other federal requirements that drive the government-to-government relations or most commonly trigger government-to-government consultation include, but are not limited to (Detailed descriptions are in Appendix A.):

- DoD AI/AN: Alaska Implementation Guidance (11 May 2001);
- DoD Instruction (DoDI) 4710.02: DoD Interactions with Federally Recognized Tribes (14 September 2006);
- Army American Indian and Alaska Native Policy (24 October 2012);
- Army Regulation (AR) 200-4: Cultural Resources Management (1 October 1998);
- Department of the Army Pamphlet (DA PAM) 200-4: Cultural Resources Management (1 October 1998);
- Presidential Memorandum: Tribal Consultation (5 November 2009);
- Presidential Memorandum: Government-to-Government Relations with Native American Governments (29 April 1994);
- EO 13007: Indian Sacred Sites (24 May 1996);

- EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (11 May 2001);
- National Historic Preservation Act (NHPA) (15 October 1966);
- National Environmental Policy Act (NEPA) (1 January 1970);
- American Indian Religious Freedom Act (AIRFA) (11 August 1978);
- Archaeological Resources Protection Act (ARPA) (11 May 2001); and
- Native American Graves Protection and Repatriation Act (NAGPRA) (16 November 1990).

Despite the number of legal mandates either requiring or suggesting consultation with tribal governments, consultation is not explicitly defined in any statute or regulation. The common understanding of the term is *to seek information or advice; to have discussion or confer with, typically before undertaking a course of action.* Consultation should not be confused with notification, obtaining consent, or arriving at consensus. Consultation is intended to address issues at the leadership level and find resolution that is—through negotiation and discussion—acceptable to all parties. Army representatives should offer consultation to tribal governments before decisions have been made and with a willingness to listen and take input into account. Without this pre-decisional approach, consultation may be viewed as disingenuous.

Responsible Parties:
The Garrison Commander is responsible for ensuring EO 13175 and the DoD AI/AN compliance for all relevant USAG FWA activities. The Garrison Commander will direct the designated Native Liaison to collaborate with appropriate personnel to meet tribal consultation needs.

Consultation Participants:
Government-to-government consultation and coordination participants may include, but are not limited to:

- USAG FWA Garrison Commander;
- USAG FWA Native Liaison;
- Federally recognized tribe representatives (including tribal Chiefs/Presidents/Chairpersons or their designees including, but not limited to, Tribal Administrators and Environmental Directors);
- Other Alaska Native organizations and entities, as deemed appropriate through consultation with tribal governments; and
- USAG FWA staff members who are subject matter experts regarding USAG FWA activities and the potential effects of those activities.

Under the terms of the Alaska Native Claims Settlement Act (ANCSA) of 1971, regional and village corporations were established to select and manage lands and to manage the financial compensation provided in exchange for the extinguishment of aboriginal title. Individual Alaska Native citizens are shareholders in these ANCSA corporations. In some cases, proposed military activities may affect land owned by ANCSA corporations and consulting with corporate entities may be appropriate. ANCSA corporations, like other Native organizations, may be invited to participate in consultations as interested parties and with the consent of the included tribal governments. However, the government-to-government relationship is not applicable to these corporations and dialogue with them is not considered government-to-government consultation. When not specifically invited by the tribe to join consultation and when activities

are not occurring on ANCSA corporation-owned lands, these corporations are considered on the same basis as public stakeholders.

When Consultation is Required:
Army-withdrawn lands in Alaska hold resources traditionally and currently utilized by the Alaska Native community. Consequently, tribal governments have an interest in the current management, past activity restoration, and future activity proposals on those lands. General and frequent consultation, outside the specific pressures of USAG FWA proposals, should be used to establish effective relationships that promote meaningful consultation when specific projects do arise.

When a USAG FWA action may have the potential to significantly affect the interests of tribal citizens and governments, USAG FWA must provide potentially interested tribes an opportunity to participate in the decision-making process regarding that action. An early offer of consultation will ensure tribal interests are given due consideration in a manner consistent with tribal sovereign authority and DoD policy. This SOP describes procedures that will help to ensure complete, meaningful consultation with tribal governments regarding USAG FWA actions.

Consultation Procedures:
Each tribe is a distinct, sovereign, governmental body; has a unique cultural identity; and, therefore, may have preferential ways of conducting business that should be accommodated as resources allow. The following, however, as USAG FWA's SOPs for the consultative process.

General:

- Ensure consultation goes beyond mere notification. Tribes must be engaged before decisions are made, early in the planning process, to allow for a more effective result—better inter-governmental relations, more meaningful input, and an unobstructed mission.
- Tribes vary by available resources and personnel, and areas of principal concern. Due to potentially limited resources, allow time for participation and review by tribes. Tribal consultation may require more time than consultation with the general public or agencies. Formal, written contact must be used to open the consultation process. Phone calls, emails or other follow-up contact should be made after any letter is sent to ensure tracking.
- Face-to-face meetings foster trust and work toward substantive, long-term relationships. Holding meetings in village locations indicates concern/interest and can be cost-effective. Whenever possible, face-to-face consultation is preferred early in the planning process so that tribal governments have all possible opportunities to participate and comment.
- Government-to-government consultation is initiated only with federally recognized tribal governments. Native non-governmental organizations are included in the coordination process, only if sanctioned by all involved tribes. NEPA, NHPA, or other legislation may require consultation with non-federally recognized tribal entities or organizations. The federally recognized Alaska Native tribes potentially engaged by USAG FWA are listed in Appendix B.
- Prior to offering consultation, staff should be inclusive when deliberating which tribes may have potential interests in Army actions. Consideration should be given to potentially effected subsistence resources and their territories; lands of customary tribal use; and the extent of effect of military activities, among other issues that may arise from specific proposals. Tribal sovereignty implies that tribes are in the best position to decide if they have an interest or may be affected by installation activities. Inclusiveness on USAG FWA's

part helps prevent a missed opportunity for early consultation, or worse, the image that USAG FWA has pre-determined a tribal government's lack of interest. Keep in mind that village re-location from traditional areas may be a factor and citizens may be interested in USAG FWA projects and policies, despite current geographic locations that appear to be far from USAG FWA lands.

- When agreements have been reached during consultation, it is imperative that USAG FWA honor those agreements and promises. Army representatives should never promise more than they can deliver.
- Army staff should approach consultation with an openness to hear and discuss tribal concerns, including those not originally scheduled for discussion. Participation in such discussions demonstrates a willingness to understand the tribal perspective; provides information regarding how the Army is perceived; fosters trust leading toward meaningful relationships; and provides needs assessment data for future beneficial interaction.
- Agency urgencies may not be tribal government urgencies and participants should be prepared for consultation to take time. It is necessary to maintain flexibility and develop contingency consultation plans, as the timeline for initiation of military activity may outpace the timeline required for consultation.
- Silence should not be taken as consent or lack of interest from tribal representatives. Tribal leadership may need to discuss decisions and input with Tribal Councils.
- When consulting with tribes, USAG FWA must be knowledgeable of Memorandums of Agreement (MOA) or Cooperative Agreements (CA) currently in effect between the Army and individual tribes. Tribal governments may also have internal regulations, ordinances, resolutions and protocols setting standards for government-to-government consultation. These must be reviewed prior to and followed during any consultation.

Initiating Consultation for Specific Events:

- Consultation meetings should be planned with the seasonal round of subsistence activities in mind. Resource gathering holds precedence over most other activities and will cause tribal representatives to be unavailable at certain times. As a result, consultation meetings should be anticipated well in advance.
- When an action triggers a consultation offer, a letter from the Garrison Commander to the leader of each tribal government that may potentially be impacted, with a copy to the appropriate secondary tribal contact, must be sent via U.S. mail. This should be followed by a faxed or emailed copy to the tribal council office to ensure receipt. The letter must include an introduction to the issues that may need consultation and a response date, should consultation be desired. Registered mail should be used when sending time-sensitive items.
- Follow-up calls to tribal leaders must be made in timely intervals after letters are sent. This practice ensures receipt of the letter/fax/email and allows leaders to accept or decline consultation expeditiously. An immediate response should not be expected, nor should a lack of response be viewed as tacit approval.
- If consultation is requested, follow-up correspondence signed by the Native Liaison should be sent with meeting specifics, a proposed agenda, authorization forms (see Appendix C), and a list of any other tribes attending.
- If a tribal leader is unable to attend, they may send a designee. An authorization form (see Appendix C), signed by the leader and stating the designee should be returned to USAG FWA prior to or at the time of the meeting. This indicates that attendees may speak on behalf of their governments and reinforces the agency's support of tribal sovereignty.

- Background information on the topic should be provided to the tribe well in advance of the meeting. Effective consultation is achieved when tribal representatives enter the meeting with an understanding of the issues to be discussed.
- If government-to-government consultation is not requested by any tribe and an informational meeting is proposed, this should be clearly stated in follow-up correspondence.

Consultation and Coordination Meetings:

- Meetings should be held at a mutually agreeable location. Village locations display Army's commitment to the government-to-government relationship, demonstrating that staff will travel to conduct consultation and coordination rather than expecting tribal delegates to travel. USAG FWA facilities or community hubs such as Tok might also be appropriate.
- If tribal representatives are invited to the installation, protocol must be observed. At a minimum, tribal officials will need to be met at the main gate and escorted to the meeting location, if they desire this service.
- Arrange meeting room seating in a circular fashion, all participants facing each other as equals. Tribal representatives should be allowed to choose where they sit. Army representatives should avoid aligning themselves at the table. Efforts to intermingle seating—avoiding an 'us versus them' atmosphere—should be made. Observers not participating in the consultation or coordination should be seated on the outside of the circle.
- Dress code should be influenced by the location of the meeting, civilian casual dress / ACU's being appropriate for village meetings and civilian business dress / ASU's for more formal consultation meetings.
- Once relationships have been established, consider inviting a delegate of the tribe's choosing to perform an invocation or speak words of welcome. Advance inquiry regarding this invitation should be given whenever possible.
- Attendee sign-in sheets should be circulated and meeting proceedings documented. Some meetings may warrant notes while others may warrant a court reporter. If recordings are made of a meeting, permission should be obtained from tribal delegates prior to recording and wishes should be complied with to preserve the meeting's mission integrity.
- Participant should be made aware that comments written or recorded during meetings are not privileged in all cases from disclosure under law. USAG FWA may be required to disclose under the provisions of the Freedom of Information Act (FOIA). Exceptions include information about sacred or archaeological sites and traditional cultural properties exempted from disclosure to the public under the NHPA (36 CFR 800.11(c)), the ARPA, and EO 13007. To ensure tribal confidence that this data is protected, discussion may be maintained as oral history or documented only as general conversation, omitting substantive details in meeting notes.
- Meetings may not result in complete tribal input at the time of the actual meeting. USAG FWA must honor the government-to-government relationship and respect the tribes' governmental processes. Tribal representatives may expect to gather information and return home to consult Tribal Councils, prior to issuing a decision or providing input.
- When traveling to villages or hosting meetings, the Garrison Commander (or highest ranking Army official authorized) should provide "official courtesies" to "authorized guests" in the spirit of AR 37-47 and DoDI 7250.13, to honor the hospitality offered to Army staff by the tribe. Tokens of appreciation or food should be provided in coordination with the Native Liaison and USAG FWA garrison headquarters. This honors the time and expense that tribal delegates have taken to attend the meeting and demonstrates courtesy and respect within the Native culture. Food is a particularly important part of tribal meetings and the time / effort made in preparing / offering meals to USAG FWA staff should be acknowledged.

- When tribal representatives are invited to meetings outside of their villages, reimbursement of travel costs for two representatives should be made whenever possible. Reimbursements are made to the tribal governments being represented. Accommodations may need to be made if the tribal governments lack the resources to pay travel costs up-front.

Meeting Follow-up:

- Depending on the purpose and outcome of the meeting, draft copies of meeting notes may be sent to participants for their review. This may be done electronically or through the mail based on delegate preference. After notes have been approved by attendees or 30 days have elapsed, whichever comes first, finalized copies should be sent to all participants and tribal invitees who were unable to attend.
- If tribes have been invited to submit written comments after informative meetings (e.g., during an Environmental Assessment or Environmental Impact Statement process), follow-up reminders of the comment period deadline and a comment sheet with proposed headings should be provided. Delegates should be reminded that comments in any form are welcome. Phone calls, letters, email, or faxes should be sent, based on delegate preference.
- If desired by the Garrison Commander, thank you letters by may be sent to attendees from command.
- Provide any follow-up information (e.g., answers to questions, requests for data, etc.) requested at the meeting via phone, fax, email and/or via U.S. mail per the preference of the recipient.

Native Liaison Officer:

DoD AI/AN: Alaska Implementation Guidance encourages the creation of a Native Liaison Officer position to carry out the DoD policy and the Alaska Guidance on behalf of the installation. DA PAM 200-4 also recommends that each Army installation appoint a Native American Coordinator for the installation. Due to the number of tribes in Alaska, combined with the large land holdings of the U.S. Army in the state, a full-time dedicated Native Liaison will be a part of the USAG FWA staff, housed within the Directorate of Public Works Environmental Division. An Army representative employed directly by the Army or an Intergovernmental Personnel Act (IPA) position is most effective, having a greater authority to speak on the Army's behalf and thus more aptly meeting the needs to the government-to-government relationship.

Duties Include, but are not limited to:

- Serve as USAG FWA Point of Contact for tribal governments. Be available and responsive to all tribal concerns and inquiries. When newly appointed, a letter of introduction should be sent to all tribal governments potentially affected by Army activity in Alaska, establishing contact and providing comprehensive contact information.
- Serve as advisor to the Garrison Commander and other officers/staff, providing briefings on current issues involving tribes and potential conflicts, before any meeting with tribal representatives, and—following Changes of Command—on historical relationships and the current operational environment.
- Draft correspondence to tribes for the Garrison Commander and Directorate head. Make all follow-up phone calls and faxes to tribes after sending correspondence and after meetings, where appropriate.

- Maintain accurate information about Alaska Native federally recognized tribal governments, including leadership, secondary contacts, staff, contact information, relevant tribal regulations, and MOA/CAs with USAG FWA.
- Identify USAG FWA divisions and responsible staff members that develop and implement projects with potential to affect tribal governments, resources, and interests. Ensure dissemination of related pertinent information to tribes in a timely manner.
- Facilitate Soldier, staff, and leadership training on American Indian/Alaska Native legal, cultural, and other issues of importance to tribal governments. Serve as a subject matter expert and advisor on Alaska Native affairs to garrison staff.
- Serve as the USAG FWA liaison for the local Native community, when appropriate. Field inquiries from and participate in interfacing activities with other agencies—Bureau of Indian Affairs, Native American Management System for Environmental Impacts, Tanana Chiefs Conference, Fairbanks Convention and Visitors Bureau, etc.
- Engage in efforts—in cooperation with designated tribal representatives—to improve and enhance government-to-government relations through outreach; meet-n-greet activities; capacity-building exercises (as funding allows); regular and open dialogue; and partnering agreements (as authorized).
- Organize working groups of tribal representatives, Army subject matter experts, and command to increase Army transparency and develop substantive relationships. Consult with tribes when determining meeting dates, places, and agendas.
- Ensure invitations are sent to tribal leaders for appropriate special events and those open to the public, such as Change of Command. Interface with USARAK Protocol to maintain tribal government leadership information, where appropriate.
- Produce quarterly newsletter directed at tribal governments to disseminate information on current and future Army activity; wildlife issues; hunting and recreational use issues; and good news stories in the area of environmental stewardship.
- Maintain contact with other DoD Native Liaisons for coordination among military components and provide mutual aid when resources allow. Interface with other Federal agency liaisons, when available.
- Maintain files on each tribe with which USAG FWA interacts, containing copies of all items sent to the tribe, including all correspondence.
- Track current events involving the Alaska Native community and tribes, conveying information to staff and command as appropriate. Sources of this information include website and other media belonging to: Alaska Federation of Natives, Alaska Inter-Tribal Council, Tanana Chiefs Conference, Doyon Ltd, State of Alaska Government, *Alaska Native News*, *Indian Country Today*, Native American Rights Fund, National Congress of the American Indian, *Native American Times*, and *Indianz.com*.

RONALD M. JOHNSON
COL, SF
Commanding

20 Mar 13
Date

Appendix A: Relevant Regulations and Guidelines (presented alphabetically)

American Indian Religious Freedom Act (AIRFA) (11 August 1978)
Following a long history in the United States of suppressing, prohibiting and outlawing the practices of indigenous religions, the AIRFA was passed to protect the Constitutional rights of indigenous community members to practice their religions. AIRFA calls for an evaluation of federal policies and procedures in consultation with Native traditional leaders to determine appropriate changes necessary to protect and preserve Alaska Native religious and cultural rights and practices. Alaska Native religious practices may involve requirements to access sacred sites on installations, to use and possess sacred objects and/or to worship through traditional ceremonies and rites. Compliance with the meaning and intention of AIRFA can only be achieved through a consultative process. Sensitive issues of disclosure and confidentiality may be encountered during the consultation process and precautions should be taken to avoid compromising information of a sensitive or otherwise restricted nature.

Archaeological Resources Protection Act (ARPA) (11 May 2001)
The ARPA establishes a permit process for the excavation of cultural sites on installation lands. ARPA also regulates access to archaeological resources on federal and Indian lands and creates penalties for unauthorized excavation or destruction. Surveys of installation land identifying possible archaeological sites are crucial to compliance with the mandates of ARPA. The USAG FWA Cultural Resources Manager will, through the USAG FWA Native Liaison, ensures that tribal consultation has occurred. NOTE: USAG FWA's ICRMP contains specific ARPA compliance SOPs.

Army American Indian and Alaskan Native Policy (24 October 2012)
The Army American Indian and Alaskan Native Policy was written and signed to recognize the Army's responsibilities to federally recognized tribes and to institutionalize principles for Army interaction with these tribes.

Army Regulation 200-4: Cultural Resources Management (AR 200-4) (1 October 1998)
AR 200-4 outlines policies, procedures and responsibilities for meeting cultural resources compliance and management requirements for the Department of the Army. The scope of this regulation includes multiple pieces of legislation and policies affecting cultural resources management. This regulation is designed to ensure that Army installations make informed decisions regarding the cultural resources under their control in compliance with public laws, in support of the military mission and consistent with sound principles of cultural resource management.

Department of the Army Pamphlet 200-4: Cultural Resources Management (DA PAM 200-4) (1 October 1998)
DA PAM 200-4 is the implementing document for AR 200-4.

Department of Defense American Indian and Alaska Native Policy (DoD AI/AN Policy) (20 October 1998)
The DoD AI/AN Policy provides guidelines for government-to-government relations between military agencies and tribal governments based on the trust relationship, federal policy, treaties, and federal statutes and in support of tribal self-governance. It specifies that DoD personnel

must consider the "unique qualities of individual tribes when applying these principles, particularly at the installation level" (*DoD AI/AN Policy, preamble*). The policy recognizes and emphasizes the importance of increasing understanding and addressing tribal governments' concerns prior to reaching decisions on "matters that may have the potential to significantly affect protected tribal resources, tribal rights, or Indian lands" (*Ibid.*). For USAG FWA, these resources include those found in plant harvesting, hunting and fishing areas on Army-managed lands, including wildlife that migrates through Army lands.

Department of Defense American Indian and Alaska Native Policy: Alaska Implementation Guidance (11 May 2001)
The DoD AI/AN Policy: Alaska Implementation Guidance outlines specific guidelines for implementing the DoD AI/An Policy for Alaska agencies.

Department of Defense Instruction 4710.02: Department of Defense Interactions with Federally Recognized Tribes (DoDI 4710.02) (14 September 2006)
DoDI 4710.02 implements DoD AI/AN Policy, assigns responsibilities and provides procedures for DoD interactions with federally recognized tribes. DoDI 4710.02 defines consultation triggers (laws, regulations, and executive orders) and provides consultation guidelines. It requires base commanders at installations that have on-going consultation and coordination with tribes through an assigned staff member, serving as a tribal liaison. DoDI 4710.02 requires tribal consultation on ICRMPs and INRMPs that may affect tribal rights, land or resources and provides measures of merit for NAGPRA.

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (11 May 2011)
EO 12898 requires federal agencies to consider any disproportionately high and adverse environmental and human health effects of their actions on minority and low-income populations. If any disproportionate effects are found, the EO requires public outreach to affected communities in order to establish alternatives or mitigation measures to the proposed action. Although public participation with affected communities requires outreach extending beyond representatives of tribal governments to residents of the community, outreach efforts should first be coordinated through tribal governments out of respect for tribal sovereignty.

Executive Order 13007: Indian Sacred Sites (24 May 1996)
The term *sacred site* is defined in EO 13007 as any specific, discrete, narrowly delineated location on federal land that is identified by an Indian tribe, or individual Indian determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion. The tribe or authoritative representative must inform USAG FWA of the existence of a site in order for the site to meet this definition. Sacred sites may include, but are not limited to burial areas and graves, purification sites, healing sites, special floral, fauna, or mineral areas that contain resources used in religious ceremonies, vision quest sites and sites associated with specific historic or traditional events.

EO 13007 articulates no specific consultation requirements, but as a practical matter compliance can only be accomplished by consulting with appropriate Native tribes and/or individuals.

The Garrison Commander, as the land manager, may impose reasonable restrictions on access to such sites in order to protect the safety of Alaska Native users or to avoid interference with the military mission or national security according to DA PAM 200-4. To the extent practicable and permitted by law and not clearly inconsistent with the Army mission or essential Army functions, USAG FWA In managing installation lands will:

- Accommodate access to and ceremonial use of Alaska Native sacred sites by Alaska Native religious practitioners;
- Avoid adversely affecting the physical integrity of such sacred sites; and
- When requested, maintain the confidentiality of sacred sites.

Executive Order 13175: Consultation and Coordination with Indian Tribal Governments (6 November 2000)

EO 13175 requires federal agencies to support the policy of tribal self-determination by implementing an effective process to ensure meaningful and timely consultation with tribes during the development of policies with potential tribal impacts. The mandates of EO 13175 apply whenever federal agency actions have substantial direct effects on a tribe or on the relationship between the federal government and a tribe, or on the distribution of power and responsibilities between the U.S. and tribal governments. EO 13175 reiterates the policy of government-to-government interactions with tribes and applies specifically to federally recognized tribal governments. The USAG FWA Native Liaison is mandated to implement EO 13175 through:

- Identifying USAG FWA staff and programs that develop and implement programs, projects and activities with potential to affect tribal governments, lands, resources, and interests;
- Promoting substantive communication whenever possible between USAG FWA and tribal governments through regular meetings and correspondence regarding department activities and plans, appropriate to each sovereign tribal government;
- Engaging in active efforts to improve and enhance government-to-government relations with tribal governments through outreach, regular and open dialogue and partnering agreements (as authorized), in cooperation with designated tribal representatives; and
- Educating agency staff about the legal status/rights of and issues of concern to tribal governments and the methods for establishing effective communication and consultation with tribal groups.

National Environmental Policy Act (NEPA) (1 January 1970)

The NEPA created a prescribed means for federal agencies to assess the environmental effects of their proposed actions prior to proceeding. The process is designed to promote the use of citizen involvement and input, as well as other independent analysis, by agency decision-makers. USAG FWA must seek the input from Alaska Native federally recognized tribes, Alaska Native corporations, and Alaska Native organizations, as appropriate, in the NEPA decision-making process. The USAG FWA Environmental Planner, through the USAG FWA Native Liaison, will ensure that government-to-government coordination with federally recognized tribes in Alaska and any other consultation requirements/needs under NEPA occur. Relevant SOPs for tribal coordination involved in the NEPA process and the preparation of an Environmental Impact Statement (EIS) includes:

- Inclusion of the Federal Register Notice of Intent that an EIS will be prepared in the quarterly newsletter to tribes;
- Offering tribal governments formal, government-to-government consultation concurrent to the scoping phase;

- Inclusion of tribal representatives in the scoping process for assessing environmental impacts on Native rights and resources;
- Government-to-government coordination with federally recognized tribes separate from the public participation process, including tribe-specific scoping and draft comment meetings with subject matter experts present for dialogue regarding questions and concerns held concurrently with the agency and public meetings;
- Supplying hard copies of draft and final documents to tribes for ease in review, with additional efforts made to assist involved tribes with the organization and content of the draft EIS before tribes are asked to provide comment;
- Ensuring extended comment times for large documents (similar to agency review timeline);
- Inclusion of individual tribes as cooperating agencies for the preparation of the EIS when the undertakings directly affect Native lands or interests and this level of participation is desired by the tribe; and
- Inclusion of other Native organizations, Alaska Native corporations, or specific individuals (such as traditional cultural leaders) if approved by all federally recognized tribes involved or if corporation lands are directly affected (in the case of corporations).

NOTE: It is important to remember that cultural resources do not need to be designated eligible for the National Register of Historic Places to be considered in the NEPA process. As the Native community often does not distinguish between *natural* and *cultural* resources, geographical places (such as collection areas for basket materials) may be considered a cultural resource. Accommodations should be made to recognize that tribal interests in and understandings of the term *cultural* resources may exceed those explicitly considered under or defined by NEPA, NHPA, and other federal and state regulations.

National Historic Preservation Act (NHPA) (15 October 1966)
Section 106 of the NHPA prescribes that any federal undertaking (projects with federal funding, federal permit, federal license or direct federal involvement) must take into account its affects on historic properties. Historic properties are those listed in or determined eligible for listing in the National Register of Historic Places individually or as part of a larger district. Included in the Standard Operating Procedures (SOPs) of the Integrated Cultural Resources Management Plan (ICRMP) are protocols for Identifying and evaluating cultural resources, assessing effects, and providing for treatment of adverse effects of historic properties within a defined area of potential effect (APE) of a proposed project. Included under these SOPs are procedures for consulting with and receiving technical expertise from federally recognized tribes when the potentially affected historic properties are of importance to a tribe.

Historic properties may be archaeological (both prehistoric and historic) sites, historic buildings and structures, and properties of traditional, religious or cultural significance that are eligible for inclusion in the National Register of Historic Places, as evaluated according to 36 CFR § 60.4. A Traditional Cultural Property (TCP) can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history and (b) are important in maintaining the continuing cultural identity of the community. The existence and significance of such locations generally can be determined only through consultation with tribes, although issues of privacy and nondisclosure often arise in these situations. The NHPA specifically provides an exemption of sensitive information regarding archaeological and TCP information from the Freedom of Information Act (FOIA) disclosure requirements. Revealing the location of

archaeological sites and TCPs can compromise their integrity and leave such sites vulnerable to looting (Section 304 of NHPA).

It is acknowledged that archaeological excavation of burials and prehistoric or historic (when directly associated with tribes) archaeological sites, while sanctioned in law, may not be supported by the Native community.

The USAG FWA Cultural Resources Manager, through the USAG FWA Native Liaison, will ensure that tribal consultation and coordination for NHPA Section 106 occurs:

- When historic properties of importance to Alaska Natives and eligible for listing in the National Register of Historic Properties may be affected by a USAG FWA undertaking;
- When undertakings may affect a property identified as having cultural value to tribes and that may not be eligible for inclusion in the National Register of Historic Properties; and
- When cultural resource issues are being addressed through the National Environmental Policy Act process.

Native American Graves Protection and Repatriation Act (NAGPRA) (16 November 1990)
NAGPRA was passed in response to concern over desecration and exploitation of Native American gravesites and appropriation of cultural items. NAGPRA brings a number of issues to the table to be carefully and thoughtfully discussed and considered. Some of these sensitive issues include how remains and items should be transported for repatriation, or otherwise documented and studied. NAGPRA requires USAG FWA and its employees to employ proper respect, as determined in consultation with concerned tribes and in accordance with cultural traditions and beliefs. NAGPRA also specifies that a Plan of Action (POA) should be developed, in consultation with tribes, regarding the resolution of impacts to inadvertent discoveries of human remains or items of cultural patrimony on USAG FWA lands. The USAG FWA Cultural Resources Manager, through the USAG FWA Native Liaison, will ensure that consultation has occurred. NOTE: USAG FWA's Integrated Cultural Resource Management Plan (ICRMP) outlines SOPs for compliance to NAGPRA.

Consultation with tribes under NAGPRA is required:

- To determine the cultural affiliation of human remains and cultural items in possession or control of any federal agency,
- When excavations of any kind inadvertently uncover human remains and items of cultural patrimony on installation lands, and
- To facilitate repatriation of human remains and items of cultural patrimony.

Presidential memorandum: Government-to-government Relations with Native American Governments (29 April 1994)
President Clinton signed a presidential memorandum to clarify the responsibilities of the federal government agencies to foster government-to-government relationship with federally recognized tribes toward building stronger day-to-day working relationships in respect to tribal self-governance and sovereignty.

Presidential memorandum: Tribal Consultation (5 November 2009)
President Obama signed a presidential memorandum on tribal consultation to acknowledge the unique legal and political relationship between the tribes and federal agencies. Its signing was

in response to concerns that federal agencies had frequently failed in their mission to include the voices of tribal officials in the creation of policy. It prescribed the reporting of federal, agencies to the President's Office of Management and Budget (OMB) on the results of consultation in consistency with EO 13175, 90 days after the memorandum's signing and annually thereafter.

Appendix B: Federally recognized tribes that may be affected by USAG FWA activities

Alatna Village
Allakaket Village
Anvik Village
Arctic Village (See Native Village of Venetie Tribal Government)
Beaver Village
Birch Creek Village
Chalkyitsik Village
Chilkat Indian Village (Kluckwan)
Chilkoot Indian Association (Haines)
Circle Native Community
Village of Dot Lake
Native Village of Eagle
Evansville Village (AKA Bettles Field)
Native Village of Fort Yukon
Galena Village (AKA Louden Village)
Organized Village of Grayling (AKA Holikachuk)
Healy Lake Village
Holy Cross Village
Hughes Village
Huslia Village
Village of Kaltag
Koyukuk Native Village
Manley Hot Springs Village
McGrath Native Village
Native Village of Minto
Nenana Native Association
Nikolai Village
Northway Village
Nulato Village
Rampart Village
Native Village of Ruby
Shageluk Native Village
Skagway Village
Native Village of Stevens
Takotna Village
Native Village of Tanacross
Native Village of Tanana
Telida Village
Native Village of Tetlin
Village of Venetie (See Native Village of Venetie Tribal Government)
Native Village of Venetie Tribal Government (Arctic Village and Village of Venetie)

Appendix C: Sample authorization for delegates attending government-to-government meetings

Fed Rec Tribe Name

authorizes

First Name Last Name authorized rep

and

First Name Last Name of second authorized rep

To provide tribal comments on the _____*(insert project name)*_____

during the meeting held on _____*(insert date)*_____.

Approved by:

_____

Name of Tribal leader **Date**
Title of Tribal leader

Appendix I. Historic Building Inspection Form

Historic Building Condition Analysis Guide and Inspection Form

Date: _____ Building # _____

Inspect Condition of the following Components if present:

Component	Good/ Fair/ Bad/ N/A	System Failure N/Y
Roof		
Ceiling		
Walls		
Floors		
Windows		
Doors		
Foundation		
Stairs		
Fixtures		
Grills and Fireplaces		
Any other Historic Component		

Also Check:

Fire Protection Systems		
HVAC		

*Typical signs of a system failure include: cracks, delamination, warping, spalling, dents, abrasions, stains, discoloration, broken or missing components, not level or plumb, rot, corrosion, mildew or fungus, insects and pests infestation.

If a component is in bad condition or is exhibiting system failure, fill out the below form.

Component Inspected: _____

Problem? _____

_____

Generic cause? _____

_____

Underlying cause (if known)? _____

What needs to be done to address the issue? _____

_____

_____

Inspector's Signature. _____

Complete the below section if work order or other type of request for work is required to address a problem.

Date of Work Order Submittal _____
Date Work was Completed _____
Follow-up information _____

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