INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN



U.S. ARMY GARRISON ALASKA

2026 - 2031

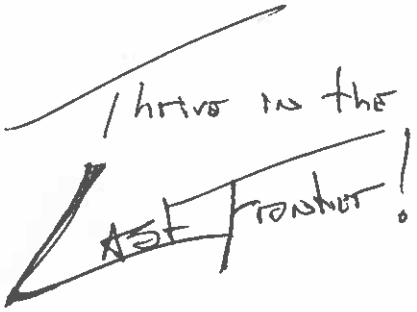
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Integrated Cultural Resources Management Plan for U.S. Army Garrison Alaska, 2026-2031

Approval

This Integrated Cultural Resources Management Plan meets the requirements for ICRMPs set forth in Department of Defense Instruction 4715.16, *Cultural Resources Program*, and Army Regulation 200-1, *Environmental Protection and Enhancement.*

For USAG Alaska:



John W. Campbell
Colonel, US Army
Commanding

5 February 2026
Date

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Executive Summary

U.S. Army Garrison Alaska (USAG Alaska) integrates resources and delivers installation services to enable the readiness of Army forces in Alaska while enhancing the quality of life for Soldiers, Families, and the community. USAG Alaska manages training areas that are utilized by active-duty military personnel from all branches of service, including National Guard and Reserve units. Fort Wainwright—outside Fairbanks, Alaska—is home to units of the 11th Airborne Division (11th ABN DIV) and tenant organizations including Medical Activity-Alaska (MEDDAC), Bureau of Land Management Alaska Fire Service, Defense Commissary Agency (DeCA), Army and Air Forces Exchange Service (AAFES), Doyon Utilities, North Haven Communities, Logistics Readiness Center, and U.S. Army Corps of Engineers (USACE).

U.S. Army Garrison Greely (USAG Greely) integrates resources and delivers installation services to enable the readiness of U.S. Army Space and Missile Defense Command and other mission partners while sustaining and enhancing the quality of life for Soldiers, Families, and Civilians. Fort Greely—outside Delta Junction, Alaska—is home to the Space and Missile Defense Command and other tenant organizations including 49th Missile Defense Battalion, Missile Defense Agency, Cold Regions Test Center, MEDDAC, Army Materiel Command, 59th Signal Battalion, 11th ABN DIV, USACE, AAFES, DeCA, North Haven Communities, Doyon Utilities, and Logistics Readiness Center. Some installation support activities are performed by Fort Wainwright personnel, as are some provided by USAG Greely personnel for Donnelly Training Area activities. Cultural Resources is one of the Environmental Division media areas managed at Fort Wainwright for USAG Greely.

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 (ICRMP) for planning purposes. The Installation Management Command (IMCOM) directs and assists its installations with Cultural Resource Management Programs consistent with AR 200-1. The Garrison Commander has direct responsibility for establishing an installation Cultural Resource Management Program by means of a plan that successfully integrates cultural resources management within the process of achieving daily mission objectives. Additionally, the Garrison Commander is responsible for appointing, by letter, an individual to serve as the Cultural Resources Manager.

This document follows the requirements for the preparation of an ICRMP as defined in AR 200-1. While not a decision-making document, this plan provides the Garrison Commander and those responsible for implementing the Commander's intent with the data needed for informed decision-making regarding the treatment of cultural resources managed by USAG Alaska. As a result, USAG Alaska personnel involved in planning activities are the intended audience for this document. This includes the Cultural Resources Manager who is the individual responsible for the day-to-day management of cultural resources on USAG Alaska-managed lands.

The ICRMP contains a set of policies that will enable USAG Alaska to meet its legal responsibilities for the management of Forts Wainwright's and Greely's cultural resources. This ICRMP applies to all lands and properties managed by USAG Alaska, including but not limited to Main Post (Fort Wainwright), Main Post (Fort Greely), 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 Recreation Area, Haines Fuel Terminal, Tok Fuel Terminal, and Sears Creek Pump Station.

Included in this document is a five-year plan that outlines goals that would benefit the management of cultural resources at Forts Wainwright and Greely. These goals, listed below, should be considered as recommendations and not as requirements.

- Ensure good stewardship of historic properties by supporting our current agreements and facilitating future agreements.
- Educate and reach out to the installation community and improve understanding of cultural resources and their management.
- Maintain compliance with applicable cultural resource laws and regulations.
- Implement surveys as needed and evaluate archaeological sites and buildings coming of age in conjunction with potential mission activities and installation development.
- Monitor the condition of and maintenance needs of historic properties.
- Consult Alaska Native Tribal governments and Alaska Native Corporations whose citizens or shareholders, respectively, have customary and/or historical association with Army-managed lands.

1 Introduction

Installations are required to create and implement an ICRMP according to Army Regulation (AR) 200-1 and DoDI 4715.16 *Cultural Resources Management*. An ICRMP serves as the key planning tool for an installation Cultural Resources Management Program, ensuring that activities conducted as part of the installation mission address cultural resource management issues, planning and resourcing priorities, and legal compliance requirements. The policies, protocols, and background information presented here are designed to ensure that the installation--its decision-makers and staff--execute professionally- and legally-sound stewardship of cultural resources in in tandem with the military mission. The optimal end-state is installation-managed lands that are available, in good condition for future training use.

1.1 ICRMP Purpose and Organization

The ICRMP is also designed to serve as a component of the installation's overall planning, to complement other plans such as the Integrated Natural Resources Management Plan and the Real Property Master Plan, and to provide the Garrison Commander with the information necessary to make informed decisions regarding the cultural resources under his or her control. All the activities programmed for ICRMP implementation measure, maintain, protect, and enhance cultural resources and identified historic properties. The primary purpose of this ICRMP is to establish, document, and provide for review cultural resources goals, objectives, and policies that USAG Alaska will use to manage historic properties located within the boundaries of lands under its jurisdiction. The secondary purpose of this ICRMP is to guide USAG Alaska cultural resources managers and personnel in their decision-making regarding management of historic properties on USAG Alaska-managed lands and the implementation of proposed cultural resource projects. This document follows the recommendations for the preparation of an ICRMP as outlined in the DoD Instruction 4715.16. The ICRMP is organized as follows:

Introduction (Section 1) provides information regarding Army policy and mission, a summary of the major plan components, a list of partnerships, a brief review of cultural resources laws and regulations, and discussion of overlapping management roles.

Historical and Geographic Context (Section 2) includes a description of the installation and its infrastructure and an analysis of the cultural landscape including a discussion of the natural environment. An overview of the installation's prehistoric and historic contexts, architectural resources, and historic landscape is also located here.

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

Future Requirements and Goals (Section 4) describes plans for the identification and prioritization actions required to implement goals and objectives of the ICRMP.

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 Army activities that may directly or indirectly impact cultural resources, and Standard Operating Procedures (SOPs) for cultural resources management. This section discusses public participation in the compliance process, current public education efforts, and recommendations for future public education and outreach.

ICRMP Implementation (Section 6) describes how USAG Alaska plans to implement the goals and objectives found within the ICRMP. It describes how the ICRMP helps sustain the military mission and discusses the partnerships, contracts, and other organizational and funding elements important to the implementation of the ICRMP.

Appendices (A through I) have been added to supplement the report sections. These include: (A) Glossary of Commonly Used Terms; (B) Commonly Used Acronyms; (C) Summary of National Register of Historic Places Criteria; (D) O&M PA Streamlined Review Process Criteria; (E) Historic Buildings and Structures Inventory; (F) Archaeological Sites Inventory; (G) Five-Year Plans for Site Monitoring, Survey, and Evaluation (H) Government-to-Government and Consultation and Coordination SOP; (I) Reports on USAG Alaska-managed Lands; and (J) Citations.

1.2 Changes from the Previous ICRMP

Since the finalization of the previous ICRMP signed in 2021, few significant changes have occurred in the planned, joint management of Forts Wainwright and Greely. Appendix A was revised twice, and the version included here is expanded to include all the routine activities that are seen on Work Orders for review through the installations.

The re-evaluation of the Ladd Field National Historic Landmark (NHL) (FAI-00236), begun in 2021 has reached the final approval stage at the National Park Service (NPS). This is expected in late 2024/early 2025. The new NHL district boundary will exclude the southern edge of the airfield and the runway. It will also remove a building with a 1956 construction date (B2077, FAI-00504) that was erroneously included and add several buildings that have been determined to contribute to the NHL's story but were omitted from the original nomination. As this change will occur during the life span of this ICRMP, maps of both the old and the new district boundaries are included here.

A total of 219 archaeological sites have been evaluated for eligibility for inclusion in the National Register. Seventy-seven of those sites were determined eligible and 142 were determined not eligible. The boundaries of six existing archaeological districts were reviewed and revised to be more inclusive and facilitate a more holistic approach to management of sites in those areas.

The first 5-year plan for the holistic management of archaeological sites ended in 2023. This ICRMP contains the new 5-year monitoring plan for the next cycle. Lessons learned and the overwhelming success of the first (previous) 5-year plan has proven this as a good model for management. The holistic approach to this management provides not only good and standardized stewardship, but also a cost savings for the Army from fieldwork efficiencies. The plan is described within the document and included as an Appendix.

At Fort Greely, the New Post Historic District (XMH-01275) was determined to be no longer eligible for the NRHP in 2021. The lack of integrity caused by renovation and demolition and the impending demolition of the SM1A nuclear reactor, determined to be individually eligible for the NRHP, left the district no longer able to convey the district's significance. The district's map has been removed from the ICRMP.

1.3 Update and Implementation 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 scheduled reviews.

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 priority are those projects and activities required to meet mission requirements in compliance with applicable cultural resources laws and regulations.

Not all projects listed in an ICRMP are 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.

1.4 Mission

The U.S. 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, sustain, and win 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 a high quality, realistic training environment and experience. Part of realistic training is creation of the battle environment where Soldiers train with their units, coordinating their efforts. This skill must be practiced in large-scale training areas and ranges with minimal restrictions to emulate the battlefield prior to going to war.

1.4.1 11th Airborne Division

In 2022 the United States Army Alaska (USARAK) was reflagged as the 11th Airborne Division (11th ABN DIV). The change to a division from a regional command not only changed the command and unit structure but also altered the mission and available assets at each installation in Alaska. Its mission is to "execute expeditionary operations within the Indo-Pacific theater, conduct Multi-Domain Operations in the Arctic, defend critical infrastructure in homeland defense, and, on order, be capable of decisively defeating any adversary in extreme cold weather, mountainous, high latitude, and high altitude environments through large scale combat operations; provide trained and ready forces in support of worldwide unified land operations; support the U.S. Pacific Command Theater Security Cooperation Program in order to contribute to a stable and secure operational environment; and, on order, execute the Joint Force Land Component Command functions in support of Homeland Defense and Defense Support of Civil Authorities in Alaska."

The units at Fort Wainwright which the 11th ABN DIV commands include the 1-11th Brigade Combat Team, Northern Warfare Training Center (NWTC), and 17th Combat Sustainment Support Battalion (CSSB). Other tenant organizations include the 1-25th Attack Reconnaissance Battalion (ARB), 1-52nd General Support Aviation Battalion (GSAB), Cold Regions Test Center (CRTC), Cold Regions Research and Engineering Laboratory (CRREL), and US Army Medical Department Activity Alaska (MEDDAC-Alaska).

1.4.2 U.S. Army Garrison Alaska

USAG Alaska's mission is to integrate resources and deliver installation services to enable readiness for Army forces in Alaska while enhancing the quality of life for its Soldiers, Families, and community.

1.4.3 U.S. Army Garrison Greely

The USAG Greely's mission is to integrate resources and deliver installation services to enable the readiness of U.S. Army Space and Missile Defense Command and other mission partners while sustaining and enhancing the quality of life for its Soldiers, Families, and Civilians.

1.5 Management and Responsibilities

The 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 Alaska Cultural Resources Management staff early in the planning stage of projects and activities to identify potential cultural resources compliance requirements. That being said, all management activities described in this ICRMP are subject to the availability of funding.

AR 200-1, *Environmental Protection and Enhancement*, outlines responsibilities regarding cultural resources legislation for installations, Army commands, and supporting organizations. Specific responsibilities of the USAG Alaska Cultural Resources Program include:

- Develop, approve, and maintain an ICRMP.
- Inventory and evaluate cultural resources located on properties under USAG Alaska control and/or 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 Tribal governments, and the public toward 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. Through staff positions, the FPO is responsible for oversight of the Army's activities under the National Historic Preservation Act (NHPA), including the review and endorsement of agreement documents and the setting of policy.

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

Headquarters IMCOM and Army Environmental Command (AEC): The Commander, AEC, under the direction of the HQ IMCOM Commanding General, is responsible for a broad range of technical support and oversight services for execution of the Army's Cultural Resources Program worldwide. AEC supports HQ IMCOM and installation cultural resources compliance activities and programs. HQ IMCOM for technical oversight and review of agreements within the Cultural Resources Programs, which includes Section 106 PAs and Memorandums of Agreement (MOAs), Native American Graves Protection and Repatriation Act (the NAGPRA) Comprehensive Agreements and Plans of Action, other cultural resources agreements and actions, and National Register nominations.

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

- Ensure that cultural resources responsibilities are implemented across all installations.
- Monitor installation Cultural Resources Management Programs.
- Review cultural resources documents and agreements, and forward to HQ IMCOM for review.
- Implement HQDA cultural resources management policy and guidelines in AR 200-1 at their respective installations.

Garrison Commander: As the installation commander and land manager at the localized level, the Garrison Commander will:

- Establish an installation Cultural Resources Program.
- Designate an installation CRM to coordinate the installation's Cultural Resources Program. The Garrison Commander will ensure that the CRM has appropriate knowledge, skills, and professional training and education to carry out installation cultural resources management responsibilities.
- Establish a government-to-government relationship with federally recognized Indian tribes as needed.
- 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 (ITAM).
- 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 the NAGPRA.
- Serve as the Federal Land Manager as defined in 32 CFR 229 with responsibility for installation compliance with Archaeological Resources Protection Act (the ARPA). The ARPA permits are issued upon approval of the Garrison Commander in accordance with ER 405-1-12 and AR 405-80 and under a short-term lease with the DPW Real Estate Branch.
- Serve as the Federal Agency Official as defined in 36 CFR 79 with management authority over archaeological collections and associated records.
- Sign the NHPA PAs and MOAs, and the NAGPRA Comprehensive Agreements and Plans of Action, and other installation cultural resource agreements following HQDA endorsement.

Cultural Resources Manager (CRM): The Directorate of Public Works (DPW) is tasked with the management of natural and cultural resources through the Resource Planning Branch of its Environmental Division of DPW. Historic properties management is coordinated through the Cultural Resources Section of the Resource Planning Branch. The CRM is appointed by the Garrison Commander and reports to the

Resource Planning Branch Chief. The Resource Planning Branch Chief reports to the Environmental Division Chief, who reports to the Director of DPW. All personnel in the Cultural Resources Section report to the CRM.

Unless otherwise stipulated by the Garrison Commander, the CRM will be the designated representative and will implement this ICRMP, which includes reviewing proposed projects, determining undertakings, and making decisions regarding DOEs in consideration of historic properties. The CRM is also responsible for coordinating with the public, the SHPO, the Advisory Council on Historic Preservation (ACHP), and other consulting parties. As the representative of the Garrison Commander, the CRM 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 Alaska guidance on behalf of the installation. The CRM or personnel within the Cultural Resources Section will serve as the Native Liaison for USAG Alaska. The capacity of the liaison includes serving as topical SME and advisor to garrison command, having an authority to speak on the Army's behalf and thus more aptly fulfill the government-to-government relationship. While duties include, but are not limited to the following, the Native Liaison will:

- Serve as the established USAG Alaska Point of Contact for Tribal governments.
- 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 Alaska and individual Tribes and Tribal organizations.
- Draft correspondence to Tribal leaders and staff for signature by the Garrison Commander when initiating consultation or at other occasions as appropriate.
- Maintain an administrative record of contact with each Tribal government.
- Engage in efforts to improve and enhance government-to-government relations with Tribal governments through regular and open dialogue and partnering agreements (as authorized).

1.6 Partnerships

USAG Alaska recognizes the contributions that interested parties outside of the Army can make to the management of historic properties. To that end, USAG Alaska's goal is to develop partnerships for the completion of collaborative work that accomplishes stewardship to the most professional standard available in a fiscally responsible manner. Partnerships include those with Alaska Native Tribal governments, the SHPO and other state agencies, the NPS, Bureau of Land Management (BLM), and universities.

1.6.1 Alaska Native Tribal Partners

While any federally recognized Tribal government will be offered government-to-government interaction if they feel their Tribal rights or resources are potentially affected by Army undertakings or actions, there are nine Alaska Native Tribal governments that are regularly consulted. These federally recognized Tribes have both customary and contemporary interests in the lands managed by USAG Alaska.

The consulting Tribal governments with whom USAG Alaska enjoys a government-to-government relationship include the Chilkat Indian Village, Chilkoot Indian Association, Village of Dot Lake, Healy Lake Village, Native Village of Minto, Nenana Native Association, Northway Village, Native Village of Tanacross, Native Village of Tetlin, and Wrangell Cooperative Association.

Additionally, interactions with Alaska Native organizations also take place for stakeholder input, mutually beneficial relationship building, or other purposes. These organizations are currently identified as Doyon, Limited; Tanana Chiefs Conference; Fairbanks Native Association; and any of the village Alaska Native Corporations that share an interest in USAG Alaska-managed lands.

1.6.2 Other Partners

Other partnerships with professional or municipal entities have been historically developed for mutual benefit. Currently USAG Alaska has such relationships with the local Certified Local Government represented by the Fairbanks North Star Borough Historic Preservation Commission; local history organization, the Tanana-Yukon Historical Society; and the University of Alaska Museum of the North. The USAG Greely has an additional relationship with the Delta Chamber of Commerce. Other partners worthy of further description include:

Alaska State Historic Preservation Officer (SHPO): The SHPO, located in the Office of History and Archaeology (OHA) and part of the State of Alaska Department of Natural Resources, 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 Alaska, interested Tribal governments, and concerned citizens to ensure that USAG Alaska's National Register-eligible prehistoric and historic properties are taken into account when planning activities that potentially could affect them.

Advisory Council on Historic Preservation (ACHP): The ACHP is an 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. The ACHP's regulation, titled "Protection of Historic Properties" (36 CFR 800), governs the

Section 106 review process. The ACHP contributes to USAG Alaska's historic property management by participating, as needed, in consultation of undertakings and in the development of agreement documents. The ACHP is also the arbitrator of disputes between the agency and the SHPO.

National Park Service (NPS): The NPS, acting for the Secretary of the Interior, administers both the NHL and National Register programs. The NPS National Register of Historic Places (NRHP) is the nation's official list of cultural properties worthy of preservation. It includes districts, sites, buildings, structures, and objects of local, state, or national significance. 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. The NPS provides technical preservation advice to and consults during Section 106 undertakings with stewards of NHLs.

Bureau of Land Management (BLM): Some of the Army-managed lands within USAG Alaska training areas are in land withdrawal status from the BLM. Because of this status, USAG Alaska and BLM have shared management responsibilities over training areas outside of the cantonment area. A MOA between BLM and USAG Alaska outlines how those responsibilities will be divided. USAG Alaska has the lead in meeting Section 106 obligations for its own and third-party undertakings. USAG Alaska also issues permits to third parties for archaeological activities on Army and withdrawn lands. USAG Alaska will 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.

Additionally, there are partner entities on the installations which steward existing or potential historic properties that were once under Army custody and may be again in the future. Doyon Utilities is the partner for privatized heat and power delivery. Under privatization, facilities and structures were transferred out of the garrisons' jurisdiction. North Haven Communities is the housing privatization partner for Forts Wainwright and Greely and has taken possession of many buildings at both locations. One historic property, Building 1048 on Fort Wainwright, is under the stewardship of this partner and is treated according to the Secretary of the Interior standards in consultation with the CRM.

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. USAG Alaska is responsible for managing cultural resources in accordance with relevant federal laws and regulations.

1.7.1 Applicable Federal Laws

National Historic Preservation Act (NHPA): The 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" [the NHPA, § 2(2) - 2(3)]. The 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 [defined as "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" [54 USC 300101]] by directing federal agencies to assume responsibility for those cultural resources under federal jurisdiction.

The act authorizes the Secretary of the Interior to expand and maintain the National Register, which is composed of historic properties—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 for the determination of 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 [ie. "Historic properties"]. 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].

The 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. The NHPA authorized the establishment of the 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 the NHPA. Section 106 requires federal agencies to consider the 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 the NHPA. Numerous federal regulations, orders, and instructions elaborate upon and clarify these provisions of the NHPA and the compliance process.

PAs and MOAs are executed pursuant to the NHPA Section 106 and 36 CFR 800 and are compliance agreements that set forth how USAG Alaska will avoid, minimize, or mitigate adverse effects 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, the NHPA PAs and MOAs will not refer to or implement an ICRMP.

Section 106 (54 USC 306108) of the 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 the ACHP with 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 administered 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 the NHPA Section 106 and 36 CFR 800 can result in formal notification from the ACHP to the Secretary of the Army of foreclosure of ACHP's opportunity to comment on the undertaking pursuant to the 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 Alaska 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.

Section 106 does not require that an undertaking be stopped, but that reasonable effort must be made to minimize harm to eligible properties. Consulting parties such as the SHPO, Tribal 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)) are invited to provide comment to this minimization. Further discussion of the involvement of consulting parties in the Section 106 process can be found in 36 CFR 800.3 through 36 CFR 800.7, 36 CFR 800.10, and 36 CFR 800.12.

Section 110 of the 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 NHLs will be undertaken when an undertaking may adversely affect such properties.

Section 110 of the NHPA imposes specific responsibilities upon USAG Alaska regarding historic preservation. In accordance with Section 110(a)(1), affirmative preservation responsibilities 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 the ACHP, SHPO, local governments, Alaska Native Tribal governments, 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 the 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 the ACHP and SHPO.

Section 111 of the 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 the NHPA requires that all research, preservation, and protection activities be conducted by people 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 the 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): The National Environmental Policy Act (NEPA) of 1969 (42 USC 4321) establishes a national policy to create and maintain conditions under which humans and nature can exist in productive harmony. The Act's goals are to prevent or eliminate damage to the environment and biosphere, stimulate human health and welfare, and enrich the understanding of our nation's vital ecological systems and natural resources. In accordance with this policy, federal agencies are mandated to preserve important historic, cultural, and natural aspects of our national heritage. As of June 30, 2025, all DoD components operate under a single, unified set of DoD NEPA Implementing Procedures. These procedures replaced the prior, separate regulations of the Army, Navy, and Air Force, as well as the rescinded government-wide Council on Environmental Quality (CEQ) regulations. The DoD's modern approach prioritizes a streamlined, efficient, and timely environmental review process.

The revised procedures still require federal agencies to prepare a document, most commonly a Record of Environmental Consideration (REC) or 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. Any substantial NEPA documents will be prepared as early in the planning process as possible and will accompany the action's proposal through the agency review process.

Impact assessments under NEPA must consider the effects of proposed federal actions on cultural resources and the effects on American Indian tribes, Alaska 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 because of compliance with cultural resources statutes, regulations and executive orders.

Antiquities Act: The Antiquities Act of 1906 (54 USC 3203) 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 archaeological

investigations. Permits are issued by USAG Alaska in consultation with the DPW Real Estate Branch under a short-term license and with Commander approval.

Archaeological Resources Protection Act (ARPA): The ARPA of 1979 (16 USC 470) establishes that archaeological 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 archaeological resources on public lands is prohibited. The ARPA sets forth criminal and civil penalties for such violations. The act requires a permit for any excavation or removal of archaeological 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 archaeological 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. Permits are issued by USAG Alaska in consultation with the DPW Real Estate Branch under a short-term license and with the approval of the Garrison Commander. Although permits are not required for work contracted by the federal agency, a permit might be required for work conducted in investigations related to the NAGPRA (e.g., recovery of Native American human remains from a vandalized site). Acquiring a permit under the ARPA regulations does not constitute compliance with Section 106 of the NHPA.

Federal agencies may withhold any information pertaining to the location of archaeological 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 the NHPA and the ARPA to exclude the release of sensitive information (on all archaeological sites National Register eligible, National Register not evaluated, archaeological sites with a the NAGPRA component, and sacred sites) 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 and minerals, coins, and bullets are excluded from protection.

The Antiquities Act and the ARPA prohibit the excavation, collection, removal, and disturbance of archaeological resources (as defined by the ARPA) and objects of antiquity (as referenced in the Antiquities Act) on federally owned Army property without an ARPA permit. Violation of the 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 archaeological 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 the ARPA.

The ARPA permits for archaeological investigations that may result in the excavation or removal of Native American human remains and other cultural items as defined in the NAGPRA, or in the excavation of archaeological resources that are of religious or cultural importance to federally recognized Indian tribes, will be issued in accordance with AR 405-80. USAG Alaska 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. The ARPA permits will provide for the disposition of the NAGPRA cultural items in accordance with the 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 Alaska will ensure that ARPA permits:

- Comply with the requirements of 32 CFR 229 and 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 the NHPA and the NAGPRA prior to issuance of the permit.
- Require that permitted activities be performed according to applicable professional standards of the Secretary of Interior.
- Require that excavated archaeological artifacts 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 the NAGPRA requires repatriation to a lineal descendant or tribe. Archaeological resources, objects of antiquity, and significant scientific data from non-federal land belong to the state, territory, or landowner. 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 Alaska staff or contractors carrying out official duties associated with the management of archaeological 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 archaeological resources on a federally owned or controlled installation, including situations where cultural items as defined by the NAGPRA may be excavated. However, in situations where the NAGPRA cultural items or the NHPA historic properties may be encountered during intentional

excavation of archaeological resources, the requirements of the NAGPRA and 43 CFR 10, and the NHPA and 36 CFR 800 must be met prior to such archaeological 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 the ARPA. Also, in accordance with the ARPA Section 9, the Garrison Commander may withhold information concerning the nature and location of archaeological 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.

Paleontological Resources Preservation Act (the PRPA): The PRPA of 2009 (16 USC 470) is designed to preserve, manage and protect paleontological resources on federally managed lands. The PRPA applies to lands managed by the BLM and the United States Department of Agriculture (USDA) Forestry Division under 2015 USDA regulations (43 CFR 291) and a 2016 proposed rule in the Federal Register which is to be finalized and published in 2019 (Federal Register Vol. 81, No. 235). This law addresses the management, collection, and curation of paleontological resources from federal land using scientific principles and expertise, including collection in accordance with permits, curation in an approved repository, and maintenance of confidentiality of specific locality data (43 CFR 291). The act authorizes civil and criminal penalties for illegal collecting, damaging, otherwise altering of defacing, or for selling paleontological resources (43 CFR § 291.30 and 291.34).

The permit-granting authority usually belongs to the land manager responsible for the property. Permits are issued by USAG Alaska in consultation with DPW Real Estate Branch under a short-term license and with the approval of the Garrison Commander. Permits are not required for work contracted by the federal agency.

Paleontological resources are defined as 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 (43 CFR 291.5).

Federal agencies may withhold any information pertaining to the location of paleontological sites if the agency determines that disclosing such information would put the resource at risk (43 CFR 291.6).

The PRPA prohibits the excavation, collection, removal, and disturbance of paleontological resources on federally owned property without a permit (43 CFR 291.13). Violation of the PRPA may result in the assessment of civil or criminal penalties (43 CFR § 291.30 through 291.39).

USAG Alaska will ensure that the PRPA permits:

- Comply with the requirements of 43 CFR 291.5.

- Require permitted activities be performed by qualified personnel with a graduate degree in paleontology or related field, experience in supervising paleontological fieldwork and in the analysis and reporting of paleontological finds (43 CFR 291.15).
- Require that permitted activities are conducted for the purpose of furthering paleontological knowledge or for public education, is consistent with Federal land management plans, and will not threaten significant natural or cultural resources (43 CFR 291.13).
- Require that the excavated paleontological specimen collection and associated records are permanently curated in a curation facility that meets the requirements of 43 CFR 23.

Paleontological resources and significant scientific data from federal installations belong to the installation. Paleontological resources and significant scientific data from non-federal land belong to the state, territory, or landowner. 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 Alaska staff or contractors carrying out official duties associated with the management of paleontological resources meet the professional qualifications and whose investigations meet the requirements of 43 CFR 291.13 are not required to obtain a permit under the PRPA for the investigation of paleontological resources on a federally owned or controlled installation.

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 the PRPA. Also, in accordance with the PRPA, the Garrison Commander may withhold information concerning the nature and location of paleontological 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.

New NAGPRA regulations were finalized by the Department of the Interior and became effective on January 12, 2024. The updates introduced significant changes to the procedures for repatriating Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. The goal of these revisions is to streamline

the repatriation process, strengthen the role of indigenous communities, and address some of the shortcomings from the original regulations.

Under the revised changes to the NAGPRA, federal agencies and museums receiving federal funds now have five years to 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 the 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. The 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 the 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 the NAGPRA) that are in federal possession or control. The 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 the NAGPRA and its implementation regulation (43 CFR 10).

USAG Alaska may enter into Comprehensive Agreements with federally recognized tribes for the purpose of compliance with the NAGPRA and 43 CFR 10. Comprehensive Agreements should establish responsibilities and address all USAG Alaska 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 Alaska has consulted with its relevant consulting Tribal governments concerning the NAGPRA procedures.

Absent a Comprehensive Agreement, USAG Alaska 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 Alaska-managed lands in accordance with 43 CFR 10.3(c)(1). 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 the ARPA when such excavations or discoveries may involve historic properties and/or archaeological 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 USAG Alaska 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 Alaska 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 Alaska must ensure that intentional excavation and response to any inadvertent discovery of the 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 the NAGPRA, the ARPA, and the 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 the 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 the 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 the NAGPRA and 43 CFR 10 will only occur with federally recognized tribes and lineal descendants as defined and provided for by the NAGPRA.

American Indian Religious Freedom Act (the 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 the AIRFA guarantee access to traditional sites on federal lands and

noninterference with religious practices. Consultation under the AIRFA with Native American groups can simultaneously satisfy the requirements of NEPA as well.

1.7.2 Curation of Federally Owned and Administered Archaeological Collections

USAG Alaska 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. This applies to collections recovered under the NHPA, ARPA, Antiquities Act, Reservoir Salvage Act (as expanded/amended by the Archaeological Recovery Act and the Archaeological and Historic Preservation Act), and PRPA. If, in the future, USAG Alaska possesses NAGPRA cultural items and human remains, control of the items will be dispositioned in a manner consistent with the requirements of NAGPRA and 43 CFR 10.

USAG Alaska has an agreement with University of Alaska Fairbanks (UAF) through an Intergovernmental Support Agreement (IGSA) for maintenance and care of collections by the University of Alaska Museum of the North (UAMN) which meets the requirements established in 36 CFR 79. Artifacts and paleontological specimens that are discovered on USAG Alaska-managed lands are processed according to repository standards and those set forth in 36 CFR 79 by USAG Alaska staff or the researchers under permit from or contract with USAG Alaska.

This ICRMP establishes procedures to minimize the amount of archaeological "material remains" (as defined in 36 CFR 79.4(a)(1)) that are collected during archaeological inventory and permanently curated. These procedures recognize that not all archaeological material remains recovered from fieldwork need be accessioned into the installation collection and permanently curated. Archaeological material remains recovered during field inventory and site identification efforts should be analyzed and recorded and left in their primary context. Artifacts that cannot be left in primary context or are recovered from more extensive excavations, such as site evaluations for National Register eligibility, or from data recovery excavations (mitigation), will be permanently accessioned into the installation collection. 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 Archaeological Collections* [36 CFR 79]. The NPS has established definitions, standards, procedures, and guidelines to be followed by federal agencies in preserving prehistoric and historic remains.

Approximately 65 cubic feet of prehistoric and historic artifacts and associated documentation related to archaeological sites located at Fort Wainwright, Fort Greely, and associated training lands are currently housed at the UAMN. The majority of the artifacts are prehistoric stone tool materials. All documentation related to these collections is reported for volume in the yearly reporting data call to command and stored in accordance with 36 CFR 1220 and 36 CFR 1228.

Approximately 4 cubic feet of paleontological specimens and associated documentation related to paleontological sites located at Fort Wainwright, Fort Greely, and associated training lands are currently housed at the UAMN. The specimens are chiefly skeletal remains of ice age mammals.

1.7.3 Executive Orders, Presidential Memoranda, and DoD Issuances

Executive Order (EO) 11593: *Protection and Enhancement of the Cultural Environment* (13 May 1971)
EO 11593 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.

EO 13007: *Indian Sacred Sites* (24 May 1996)
EO 13007 establishes that federal agencies are responsible for allowing Native American religious practitioners access to and ceremonial usage of sacred Native American sites on federal lands. The agency will keep the locations of such sites confidential and will avoid adversely affecting the integrity of these sites.

USAG Alaska will consult with Tribal governments to identify sacred sites that are necessary for the exercise of traditional religions and will provide access to USAG Alaska-managed lands for tribal practice of traditional religions, rights, and ceremonies. USAG Alaska may impose reasonable terms, conditions, and restrictions for 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 Alaska will maintain the confidentiality of sacred site locations.

To date, no sacred sites have been identified on USAG Alaska-managed lands, but once identified, USAG Alaska will take measures to avoid adversely affecting the physical integrity of said sites and will establish procedures to ensure reasonable notice is provided to federally recognized Tribal governments when proposed actions or land management policies and practices may restrict future access to, restrict ceremonial use of, or adversely affect the physical integrity of sacred sites

EO 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 Tribal governments during the development of policies with potential Tribal impacts. This EO mandates action 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

and applies specifically to federally recognized Tribal governments. USAG Alaska implements EO 13175 through:

. Identifying USAG Alaska 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 Alaska 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.

. 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* (29 April 1994)

This Presidential Memorandum 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 479(a)(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.

Presidential Memorandum: *Government-to-Government Relations with Native American Tribal Governments* (29 April 1994)

U.S. policy concerning relationships with Native American Tribes is established under the Presidential Memorandum which 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 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.

***DoD American Indian and Alaska Native Policy* (20 October 1998)**
The DoD American Indian and Alaska Native Policy provides guidelines for government-to-government relations between military agencies and Tribal governments based on the federal 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 Alaska, these resources include those found in plant harvesting, hunting and fishing areas on Army-managed lands, including wildlife that migrates through Army lands.

***DoD American Indian and Alaska Native Policy: Alaska Implementation Guidance* (13 April 2020)**
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) (24 September 2018)
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 the NAGPRA.

DoD Instruction 4715.16: *Cultural Resources Management* (18 September 2008)
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

AR 200-1: *Environmental Protection and Enhancement* (13 December 2007)
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-managed 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 CRM, 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 CRM and project proponents. Environmental audits and status reports are required, and entities responsible for site selection for military construction activities must conduct environmental surveys.

Additionally, AR 200-1 provides the policy for complying with the NHPA, the AIRFA, EOs 13007 and 13175, the NAGPRA, the ARPA, and the 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 and paleontological properties, sites of traditional cultural importance, and procedures for curating archaeological and paleontological resources. AR 200-1 and its implementing guidance Department of the Army Pamphlet (DA PAM) 200-1 nests with AR 200-4 and DA PAM 200-4 to form comprehensive guidance for an installation Cultural Resource Management Program.

AR 870-20: *Army Museum Enterprise and Army Artifact Collection* (27 June 2022)
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 Archaeological 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, rescinded 2025, re-issuance anticipated)**

The Army American Indian and Alaskan Native Policy dovetails with the DoD American Indian and Alaska Native Policy. Signed 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. Guidance for implementing the policy was signed on 10 July 2014.

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 29 September 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, the AIRFA and EO 13007 address different aspects of Native American religious practices; Section 110 of the NHPA, EO 11593, and the ARPA all require inventory of all cultural resources on land under the control of federal agencies or the federal government; and the 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 the 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 the NHPA or whether it has "no significant impact" under NEPA. NEPA applies to federal actions that have the potential for significant environmental impacts; the 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 the 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 the NHPA, 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 - 800.6 if the agency official has

notified in advance the SHPO/Tribal Historic Preservation Officer, 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 the ARPA and the 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 the NAGPRA and the NHPA; the 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. The NHPA, ARPA, NEPA, and EO 13007, *Indian Sacred Sites*, contain consultation requirements. Section 106 of the 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 the 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 on environmental and cultural resources. EO 13007, 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.

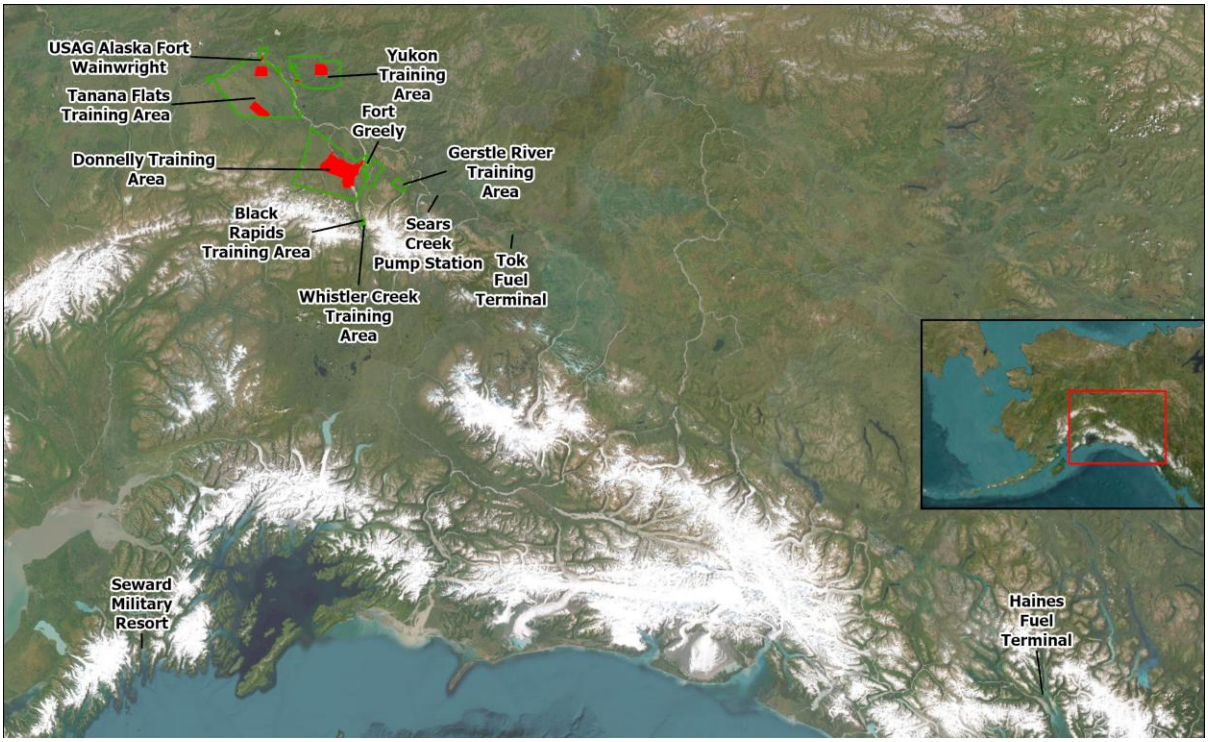


Figure 1. Fort Wainwright, Fort Greely, and associated training lands.

2 Historical and Geographic Setting

USAG Alaska manages the cultural resources on Forts Wainwright and Greely. Fort Wainwright is located in interior Alaska, north of the Alaska Range and consists of Main Post and six major training areas--Tanana Flats Training Area (TFTA), Yukon Training Area (YTA), Donnelly Training Area East and West (DTA)[1], Gerstle River Training Area (GRTA), Black Rapids Training Area (BRTA), and Whistler Creek Training Area (WCTA) totaling approximately 1,559,000 acres. Fort Greely is located in interior Alaska adjacent to the town of Delta Junction, 103 miles southeast of Fairbanks and encompassing approximately 6,700 acres.

Additionally, there are outlying properties under the jurisdiction of USAG Alaska, including the Seward Military Resort, a parcel where the Permafrost Tunnel Research Facility is located, and several parcels that formerly supported the Haines-Fairbanks Pipeline which are now in restoration status—Haines Fuel Terminal, Tok Fuel Terminal, and Sears Creek Pump Station

2.1 Infrastructure

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

The Fort Wainwright Main Post area consists of the cantonment, including an airfield, and local training areas. Immediately to the south of the Main Post area is the Small Arms Range Complex. TFTA is 650,000 acres located directly south of the Main Post across the Tanana River. It contains two dudded impact areas, 13 landing zones, three drop zones, multiple firing points, and an air assault strip throughout its light maneuver area that is used primarily in the winter due to its high volume of wetlands. YTA, located approximately 20 miles southeast of the Main Post and measuring 260,000 acres, has two drop zones, four landing zones, five ranges, numerous observation and firing points, a dudded impact area, and an Air Force AFTAC. Its terrain is increasingly hilly west to east, and its limited road system is primarily to the west of the central impact area. DTA East and West are approximately 648,485 acres in size and is located approximately 90 miles southeast of the Main Post. It contains a small arms complex, an expansive nine-part dudded impact area, weapons testing ranges, maneuver ranges, seven drop zones, two air assault strips, 14 ranges, and numerous observation and firing points. It ranges from mountainous to tussock terrain with a complex road system and aviation-only access for large portions of its footprint. BRTA and WCTA, 4,654 acres combined, are home to the NWTC which has structures and facilities necessary for high altitude/high latitude training, including a ski hill and rock-climbing wall. GRTA is 20,580 acres in size and has no infrastructure. It is sparingly used for maneuver training and non-dudded small arms training.

Fort Greely consists of a cantonment, airfield, the Missile Defense Complex, and testing facilities used by the Cold Region Test Center (CRTC). It is surrounded on all sides by DTA East and West with a small attachment to State of Alaska and private land on its southwest boundary.

2.1.1 Training Areas

The major training areas are managed by USAG Alaska are broken into many concise, numbered training sub-areas. Fort Wainwright Main Post has 11 local training areas; TFTA has 10 training areas; YTA has 18 training areas; and DTA contains 50 training areas, all managed as unique entities.

2.1.2 Ranges / Courses

For the purposes of this ICRMP, ranges are defined as those areas where live-fire, non-dudding training may occur and are under the jurisdiction of ITAM. Live-fire training may occur in other locations, but these ranges or courses are designed specifically for this activity. Listed below are the ranges fitting this definition at each major training area.

There are 18 ranges and courses on the Main Post and adjacent Small Arms Complex. YTA supports seven ranges, including a Digital Multi-Purpose Training Range, an Infantry Platoon Battle Course, an Infantry Squad Battle Course, the McMahon CALFEX Range, the Grizzly Battle Course, and a Trench. BRTA has a High Angle Mountainous Marksmanship Range (HAMMR).

At DTA, there are 16 ranges, including a Battle Area Complex; a Combined Arms Collective Training Facility; a Combined Arms Live Fire Exercise Village; a Collective Training Range that includes two Infantry Platoon Battle Courses and one Multi-Purpose Training Range; a HAMMR Range; 3 ranges used primarily by CRTC for testing; and the Wills Small Arms Complex made up of 8 small arms ranges.

2.2 Prehistoric Context

Interior Alaska has been continuously inhabited for the last 14,000 years, and evidence of this continuum of human activity has been 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. USAG Alaska-managed lands comprise a vast and still relatively unsurveyed 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. In recent years, the Tanana Valley has proven to be an early New World population center with a number of reliably dated archaeological sites placing humans in the area at the end of the last glacial period. These sites include McDonald Creek, a 13,900[2] year old bison processing site with stone tool resharpening debris[3] located in the TFTA, as well as Swan Point, dating to 14,150 years ago[4], and Holzman, at 13,600 years ago[5], all three of which are located within a 10-mile radius. These sites have stone tool debris, human-worked bone, and remains of extinct Pleistocene fauna in well stratified sediments with radiocarbon dates from charcoal and faunal material in cultural contexts. No other regional complex of well-dated pre-Clovis sites exists anywhere else in North or South America.

After initial colonization, archaeologists generally divide interior Alaska's prehistory into three broad time periods: the Paleoarctic Tradition (12,000-7,000 years ago), the

[2] All dates are given in calendar years before present.
[3] Goebel et al. 2014, Graf et al. 2018
[4] Holmes 2011
[5] Wygal et al. 2018

Northern Archaic Tradition (7,000-1,500 years ago), and the Athabascan Tradition (1,500-800 years ago)[6]. Archaeological 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[7]. Several sites in areas surrounding Army-managed lands demonstrate that people were well established in interior Alaska by 13,000 years ago. Significant sites in the Tanana Valley dating 13,500-12,000 years ago include Healy Lake[8], Walker Road[9], Mead[10], Upward Sun River[11], Keystone Dune[12], Broken Mammoth[13], and Delta River Overlook[14]. The Younger Dryas cooling event from 13,000-12,000 years ago may have led to a temporary population decline[15] in the Interior before permanent, wide-spread colonization.

The Paleoarctic Tradition is a term now generally used by archaeologists to refer to the first settled people known from all over Alaska. It was originally defined by Anderson[16] [17] as the earliest microblade-using tradition in the American Arctic, with a proposed relationship to late Pleistocene northeast Asian 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 higher ground, they could locate and track prey that included large mammals such as mammoth and bison. Evidence from the Upward Sun River site, located on the south side of the Tanana River between DTA and TFTA, for example, demonstrates that hunter-gatherers in interior Alaska were concentrating on harvesting bison and wapiti at the end of the Pleistocene (the Upward Sun River site is also known for one of the earliest burials in the Americas[18]). The nearby McDonald Creek site on Army-managed land has yielded artifacts in association with bison, waterfowl, and small game[19]. Delta River Overlook site, in DTA, also contained an archaeological record with early diet indicators. This site was visited twelve times between 12,000 and 2,000 years ago, and its earliest inhabitants were big game hunters concentrating on the procurement of bison and wapiti[20]. 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.

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[6] Potter 2008a, 2008b
[7] Bigelow and Powers 2001
[8] Cook 1996
[9] Goebel et al. 1996
[10] Holmes 2001
[11] Potter et al. 2014
[12] Reuther et al. 2016
[13] Holmes 1996
[14] Potter et al. 2018
[15] Potter 2008a, 2008b
[16] Anderson called it the “American Palaeoarctic Tradition,” but most researchers use the shortened version.
[17] Anderson 1968, 1970
[18] [Potter 2008a, 2008b; Potter et al. 2008; Potter et al. 2011
[19] Esdale et al. 2012c, Gaines et al. 2011, Goebel et al. 2014, Graff et al. 2018
[20] Potter et al. 2018

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 from sites in the Nenana Valley[21]. This complex began approximately 11,000 years ago with an artifact assemblage that included triangular or teardrop-shaped, bifacially worked projectile points ("Chindadn" points[22]); 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 Fort Wainwright training lands (Broken Mammoth[23], Chugwater[24], Donnelly Ridge in DTA[25], Healy Lake[26], Delta River Overlook in DTA[27], Mead[28], McDonald Creek in TFTA[29], and Swan Point[30]).

The Denali Complex, dated roughly to 10,500 to 8,500 years ago, was originally defined by West[31] 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 later defined the Denali Complex as a regional variant of the American Paleoarctic Tradition[32]. Denali sites in the vicinity of Fort Wainwright's training lands include Mount Hayes[33], Swan Point[34], and Gerstle River[35]. Several sites in DTA and the Tanana Flats have been dated to this period (including Delta River Overlook[36] and Hurricane Bluff[37]).

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[38], the general understanding of interior Alaskan

[21] Powers and Hoffecker 1989
[22] Cook 1969, 1975; Holmes and Cook 1999
[23] Holmes 1996; Yesner et al. 1999
[24] Lively 1996
[25] West 1967, 1996; Donnelly Ridge
[26] Cook 1989
[27] Potter et al. 2018
[28] Holmes 2007
[29] Graf et al. 2018
[30] Holmes et al. 1996; Holmes 1998, 2007
[31] West 1967, 1975
[32] West 1981
[33] West 1996
[34] Holmes et al. 1996; Holmes 1998, 2007
[35] Potter 2001
[36] Potter et al. 2018
[37] Esdale et al. 2015
[38] e.g., Dumond 2001

archaeologists is that there is a behavioral explanation for the presence or absence of microblades in different assemblages[39]. Moreover, both Nenana and Denali technology persist in central Alaska throughout the Holocene[40].

Site density declined in the areas around Fort Wainwright in the early Holocene, suggesting a slight depopulation during a period of climate change that initiated the widespread establishment of spruce forests[41]. The boreal forest in interior Alaska was established by 8,000 years ago[42]. Sites from this time period are less well publicized than the older sites, but include Houdini Creek (circa 8,600 years old)[43], Lucky Strike (c. 8,500 years old)[44], Blair Lakes (c. 8,000 years old)[45], Delta River Overlook (several components)[46], Delta Creek (c. 8,000)[47], and the Campus Site (c. 7,700 years old)[48]. Bison, wapiti, and birds were the most important subsistence game during this period[49].

The site density increased again after about 6,000 years ago in interior Alaska[50]. This population increase coincides roughly with the emergence of the Northern Archaic Tradition and the appearance of side-notched projectile points. Anderson 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[51]. 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[52]. Artifact assemblages associated with this culture can vary but generally contain a myriad of tools ranging from bifacial knives and microblades to end scrapers and side-notched projectile points. Middle Holocene hunter-gatherers had a subsistence economy focused on seasonally abundant game including caribou, fish, and moose[53]. Notched point assemblages occur in many sites in interior Alaska, including over one dozen on Army-managed lands, 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[54].

[39] Holmes 2001; Potter 2008a, 2008b; Yesner and Pearson 2002
[40] Bever 2006
[41] Potter 2008a, 2008b
[42] Bigelow and Powers 2001
[43] Bever 2001
[44] Potter et al. 2007
[45] Esdale et al. 2017
[46] Potter et al. 2018
[47] Doering pers. comm. 2018
[48] Pearson and Powers 2001; Potter et al. 2007; Potter 2008
[49] Potter 2007, 2008a, 2008b
[50] Potter 2008a, 2008b
[51] Anderson 1968
[52] Clark 1992; Cook and Gillispie 1986
[53] Potter 2008a, 2008b
[54] Robertson et al. 2008

Use of microblade and burin-based industries appears to continue through the middle and late Holocene in interior Alaska[55]. By the late Holocene, archaeologists see a shift from seasonal large mammal hunting with a nomadic lifestyle to a focus on seasonally over-abundant resources, use of storage, and more permanent settlements[56]. Artifact assemblages do not drastically change until the last millennium of the Holocene when microblades gradually disappear from the archaeological record[57].

Linguistic evidence suggests that the Athabascan culture may have appeared in the Tanana Valley as early as 2,500 years ago, or earlier[58]. Through ethnography, oral history, and a broad array of cultural items, much has been learned about Athabascan culture and history in the region. The artifacts associated with the Athabascan 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[59]. A late prehistoric Athabascan occupation is recognized at several sites in and around Fort Wainwright's training areas[60]. Of particular interest in this regard is a copper projectile point found in a buried context at DTA[61].

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 in the Interior are rare, but the limited body of evidence allows for several generalizations. The raw material usage was reorganized in the Athabaskan Tradition, which de-emphasized stone toolmaking and increased the emphasis on the manufacture of items from native copper and organic materials[62]. 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 mammals and freshwater marine animals such as fish and mollusks[63]. 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[64].

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

[55] Esdale 2008; Potter 2004
[56] Potter 2008b
[57] Potter 2008a, 2008b
[58] Kari 2016; Kari and Potter 2010
[59] Clark 1981
[60] Andrews 1975; Andrews 1987; Cook 1989; Mishler 1986; Sheppard et al. 1991; Shinkwin 1979; Yarborough 1978
[61] Robertson et al. 2009
[62] Dixon 1985
[63] McFadyen Clark 1981; McFadyen Clark 1996; Ream 1986; Sheppard et al. 1991; Shinkwin 1979
[64] Andrews 1975; Andrews 1977; Andrews 1987; McFadyen Clark 1981; VanStone and Goddard 1981

to support themselves and spent 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[65].

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. The bands of the Tanana and Tanacross groups are historically associated with the geographic area that embodies Forts Wainwright and Greely. Salcha, Chena, Wood River, Goodpaster, and Healy Lake bands have inhabited the region since protohistoric times and possibly even prehistoric times[66]. 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[67]. Several villages have been reported on or near Fort Wainwright. One occupied by the Wood River band is said to have been located in the southern part of Fort Wainwright but has not been found[68]. The Blair Lakes Archaeological District on TFTA may relate to the prehistory of the Athabaskan Tradition. Euro-American historic archaeological sites are also present[69].

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.[70]

As Euro-American traders, miners, 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 interior Alaska 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.[71]

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[65] Andrews 1975
[66] Andrews 1975
[67] McKennan 1981
[68] Dixon 1980; Reynolds 1986
[69] Gamza 1995; Phillips 1984
[70] McKennan 1981
[71] McKennan 1981

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 or Nuchalawoyya (modern-day Tanana), Belle Isle (modern-day Eagle), and Fort Yukon.

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 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. Captain William Abercrombie established the military trail connecting Valdez to Eagle in 1899. Other trails, such as the Bonnifield and Donnelly-Washburn 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, including Pile Driver or 30-Mile, Gordon's, and Sullivan's Roadhouses. In 1906, congressional appropriations led to the 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 Fort Wainwright 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.[72]

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.

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 Alaska Railroad 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.

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.

2.3.1 Military History

The earliest U.S. military activities in the Interior were Army reconnaissance expeditions.[73] In 1899, the Army established posts on the Yukon River at Fort Egbert (near present-day Eagle) and Fort Gibbon (near Tanana). Soon after, the Army constructed a telegraph, cable, and wireless system connecting Alaskan towns and military posts to Seattle. The Washington-Alaska Military Cable Telegraph System (WAMCATS) was constructed in sections between 1899 and 1906. One section ran from Fort Liscum (near Valdez) to Fort Egbert, crossed the Fortymile region east of Fort Greely, and then down the Tanana River to Fort Gibbon. The U.S. Army Signal Corps established a telegraph station three miles from the mouth of the Salcha River in 1902 and another at Big Delta in 1904.

In 1939, construction began on Ladd Field. The post became the station of the Cold Weather Test Detachment. Initially designed to be a small permanent facility, Ladd

[72] Price 2002

[73] 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.

Field's 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 goals were to develop standard procedures for servicing and operating aircraft in subzero temperatures, evaluate the cold weather performance of all aircraft components, and test other important gear for arctic operations such as clothing, communications equipment, and survival gear.

With the outbreak of war, Ladd took on additional roles, being home of the Sixth Air Depot Group and the Air Transport Command. It served as the transfer point for over 7,900 aircraft bound for the Soviet Union on the Alaska-Siberia route during Lend-Lease operations. Lend-Lease also required the construction of airfields in Big Delta (near Fort Greely), Fairbanks (Ladd Field), Northway, Tanacross, Galena, Big Moses, and Nome to aid the operation.

The Army constructed the Alaska-Canadian Highway during 8 months and 12 days in 1942 to connect the more southern Lend-Lease airfields and to support Lend-Lease's Northwest Staging Route. Station 17 for the Air Transport Command was established on June 30, 1942, just a few miles south of the junction of the Alaska and the Richardson Highways. The airstrip was used as an alternative to Ladd Field, a practice landing field for Soviet pilots, a staging field for the Army Air Transport Command, and as an auxiliary transfer point for Russian and American pilots involved in the Lend-Lease Program.[74] To facilitate this work, a Birchwood Hangar, facilities for 854 officers and enlisted men, a steam plant, a 14-bed hospital, and four 25,000-gallon tanks were included in the construction at Big Delta.

By the war's end in 1945, Ladd Field had expanded to accommodate 4,555 personnel. Wartime facilities sprang up around the perimeter of the airfield in the form of prefabricated temporary buildings-- Quonset huts, Butler Buildings, wood frame 800 Series buildings, and Pacific Huts. Construction continued into 1944 and when completed Ladd Field became a sprawling airbase. It had grown from a small garrison of 17 buildings to more than 700. The original six-square-mile cantonment had more than doubled in size and a bombing and gunnery range (Tanana Flats) had been established south of the base. 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.

When the Air Force became a separate branch of service in 1947, Ladd Field was re-designated as Ladd Air Force Base and served as the Cold War era 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.

[74] CH2M Hill, "Preliminary Assessment, Fort Greely Alaska," (U.S. Army Engineer District Alaska, 1992), p. 27.

Ladd's air defense mission was to deter the Soviet Union from taking Alaskan territory and provide 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.

In 1961, the U.S. Air Force moved its operations to Eielson AFB, twenty-six miles southeast of Fairbanks, and transferred the installation, which was renamed Fort Jonathan Wainwright, to the Army. The Army's missions for the next 15 years included ground and anti-aircraft defense, northern warfare doctrine development, training support, logistics, National Guard and Reserve support, and civil defense assistance. NIKE missile batteries were in operation beginning in 1959. Cold weather testing and training in Alaska expanded and the Cold Regions Research and Engineering Laboratory (CRREL) was established in 1961. 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 BLM in the mid-1980s, and a number of these out-grants remain in effect.

During the war in Vietnam, improvements at Fort Greely focused primarily on equipment modernization, rather than on new construction. Arctic training again was emphasized in the 1970s, with exercises conducted annually. In 1986, the 6th Light Infantry Division (LID) was activated at Fort Wainwright with a primary mission to function as a rapid deployment force, ready to deploy worldwide on short notice.

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 (USARAK).

In the post-Cold War period, Fort Greely was part of a significant military reduction and reorganization. In 1995, the Defense Base Realignment and Closure (BRAC) Commission selected Fort Greely as one of eleven U.S. Army posts to undergo realignment.[75] New requirements for basing interceptor missiles as part of a Ballistic Missile Defense System (BMDS), however, resulted in renewed activity at Fort Greely. The surrounding training areas were transferred to the jurisdiction of Fort Wainwright

[75] Defense Base Closure and Realignment Commission 1995 Report to the President

and the newly realigned BMDS Fort Greely included the airfield, cantonment area, and the missile fields just south of the cantonment area.

At Fort Wainwright, an anticipated division stationing was downgraded to the activation of a brigade. Over the following years, the composition of USARAK transformed multiple times. Army Transformation brought the stationing of large, brigade-sized combat teams with ground maneuver, air support, and engineering. The Stryker Brigade Combat Team (SBCT) utilized the expansive training lands and were deployed multiple times over the course of wars in the Middle East.

Following the Base Realignment and Closure Act (BRAC) decision to close Fort Greely, a MOA was signed with the SHPO in 2000. The core of Fort Greely was concurred to be eligible for the National Register as the Fort Greely New Post Historic District with a period of significance 1946-1989. This district was determined not eligible for the National Register due to a loss of integrity in 2021.

With the ending of wars in the Middle East, units were reconfigured to be more integrated and the Stryker vehicles were phased out, the last units departing in 2022. In 2023, USARAK was reflagged as the 11th Airborne Division (11th ABN DIV) with a reconfiguration of unit assignments and new assets. Alignment of aviation units at Fort Wainwright, previously under commands out of state, fell to the 11th ABN DIV and the division's focus turned to air assault and regaining skills for fighting in high latitudes.

In 1985, the Ladd Field NHL was designated in recognition of Ladd Field's role in World War II. The NHL is a multiple property district encompassing the core permanent buildings around the North Post, the airfield, utilidors and runways. Its period of significance is 1939 to 1945 and it was deemed significant due to its roles in Lend-Lease operations, Air Transport Command, and cold weather testing.

In recognition of the exceptional significance of the Air Force missions, the Ladd Air Force Base 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 to 1960 period of significance.

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

2.4.1 Training

Off-Road Maneuver: Various types of off-road maneuver exercises occur on USAG Alaska-managed lands. These include the use of light tracked vehicles, trucks, and small four-wheel drive vehicles, and the Beowulf, a heavy, tracked transport vehicle. 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 can play a role in scheduling. Off-road activity by tracked vehicles in winter has a low potential for impacting archaeological resources through frozen ground and 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. Backfilling often follows training.

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 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. 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 from weapons such as mortars or howitzers are aimed, potentially producing unexploded ordnance at the impact site. Unexploded ordnance is munitions (bullets, mortars, grenades, etc.) that did not explode when they were deployed and still pose a risk of detonation. Activities occurring in a dud-producing impact area are streamlined undertakings addressed by the *Programmatic Agreement between the United States Department of the Army and the Alaska State Historic Preservation Officer Regarding the Operation, Maintenance, and Development of the Army Installation at Fort Wainwright and Associated Training Areas* because of the safety issues involved in surveying those areas.

2.4.2 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 Alaska provides quality opportunities for outdoor recreation (e.g., hunting, fishing, off-road vehicle areas, and winter recreation) when lands are not required for the military mission. Public recreational access, however, has the potential to increase the risk of damage to cultural resources through inadvertent destruction or active vandalism.

Vandalism to cultural resources can result in the loss of integrity and is a criminal offense in violation of the ARPA. When identified and investigated with a positive outcome, it will be prosecuted.

Conservation law enforcement has the potential to affect cultural resources in a positive way by enforcing the ARPA and ensuring recreational impacts on cultural resources are minimized. Federal conservation law enforcement officers (CLEOs) are equipped with data required to identify if historic properties are being threatened in the field. When patrolling the training areas, they look for digging that is unanticipated and interact with recreationists ensuring Sikes Act Permit use compliance stops. These interactions are also used as opportunities to educate land users about rules associated with resource protection.

2.4.3 Installation Management

Building construction, maintenance, and demolition; landscaping and vegetation maintenance; and other regular practices on a working military installation have the potential to affect historic properties. These must be reviewed by the Cultural Resources Management staff to ensure compliance with the NHPA Section 106 and other relevant laws. Review of work orders and other planning assists in shaping activities to prevent damage. The application of the streamlined review process is another method of coping with these situations, when applicable.

Maintenance and upgrade that includes road and trail repair, grading, upgrading, and snowplowing all have the potential to impact archaeological resources. Site locations are avoided whenever possible, and work is mitigated when needed.

Mission requirements may make the construction of new facilities necessary. The excavations for building foundations, utilities, and roads may uncover or destroy cultural resources. 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.

Similarly, demolition of historic properties 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.

Maintenance activities can destroy or alter features of a historic property. Exterior finishes, some interior alterations, building additions, and compliance features must be reviewed on a case-by-case basis.

Vegetation management activities such as the removal or planting of trees and vegetation outside the cantonments can disturb archaeological sites. Heavy equipment, including hydroaxes, used in these activities may also have an adverse effect on archaeological sites.

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

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 the NHPA Section 106 compliance.

2.4.4 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. 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 repairing damaged lands and use of land construction technology to avoid future damage to training lands. LRAM uses techniques such as revegetation and erosion control to maintain soils and vegetation required to accomplish the military mission. These efforts are specifically designed to maintain quality military training lands and minimize long-term costs associated with land rehabilitation or land acquisition[76].

With the use of heavy equipment and erosion control techniques, LRAM may cause ground disturbance that can negatively impact archaeological sites. Generally, LRAM does not require extensive use of heavy equipment or massive land reshaping[77]. LRAM projects are also planned to avoid 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 and protective signage 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, and providing oversight of installation natural and cultural resources. Conservation allows Army managers to steward natural and cultural resources through the planned management of these resources, accomplished through coordination with facility managers, range managers, and other land users, and through the implementation of projects that help preserve, maintain, repair, and improve natural and cultural resources toward the sustainment of mission requirements.

[76] CEMML and Gene Stout & Associates 1998a:126
[77] CEMML and Gene Stout & Associates 1998a:126

Facilities Management: Facilities management has the potential for impacting cultural resources. This includes abatement and disposal of building hazardous waste. 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.

2.4.5 Organizations

The cantonments are comprised of all the facilities and infrastructure needed to 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 Forts Wainwright and Greely 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 garrison and tenant users which are identified as potentially having an effect on historic properties include the Directorate of Public Works; Directorate of Emergency Services; Directorate of Plans, Training, Mobilization and Security; Cold Regions Research and Engineering Laboratory; Cold Regions Test Center; Northern Warfare Training Center; 11th Airborne Division; US Army Space and Missile Defense Command; Missile Defense Agency; United States Air Force; visiting military entities that conduct training exercises on USAG Alaska-managed lands; and Bureau of Land Management, Alaska Fire Service.

3 Cultural Resources Inventory

This section describes the known cultural resources on USAG Alaska-managed lands including historic buildings and archaeological sites. This section also details the reports, contexts, and other documentation of these resources. Cultural resources determined and concurred to be historic properties are assigned Alaska Heritage Resources Survey (AHRS) numbers which are compiled into a database managed by the Alaska OHA for use by qualified members of the profession.

3.1 Archaeology

Fort Wainwright, Fort Greely and its training lands contain 736 known archaeological sites, one traditional cultural property, and six archaeological districts (Appendix F). Seventy-seven sites are eligible for the National Register, 517 sites have not been evaluated, and 142 additional sites have been determined ineligible for the National Register. Of the eligible or un-evaluated sites, 9 are historic and 596 are prehistoric sites. Of the 1.6 million acres managed by USAG Alaska,1,421,874 acres are accessible for survey, calculated by removal of surface danger zones, impact areas, wetlands, acreage underwater, or other inaccessible areas. Of that accessible acreage, 17.8% has been surveyed for archaeological resources.

Archaeological surveys of the Fort Wainwright Main Post area began in 1979. Surveys of the north side of the Chena River and Birch Hill area, resulted in the discovery and relocation of several prehistoric archaeological sites (FAI-00040, 00041, 00042, 00043, 00199, and 00200)[78]. Surveys of the Main Post building areas continued in the 1980s[79] [80]. No sites were found in these previously disturbed areas. Surveys of the River Road Pond in 1996 found one site (FAI-00509), which has failed to be relocated in subsequent attempts. Beginning in 2001, several different principal investigators targeted areas of construction undertakings. Two historic sites (FAI-01603 and 01604) and one additional prehistoric site (FAI-01990) were found in these investigations. In 2011 and 2012, surveys were completed of the entire cantonment north and south of the Chena River, discovering three additional historic sites (FAI-02117, FAI-02197, and FAI-02198). Two sites were evaluated for the National Register in 2013 (FAI-00199 and FAI-00200). Of the 11 archaeological sites known from the Fort Wainwright cantonment, 10 have been determined not eligible and one has been determined eligible (FAI-00040) for inclusion on the National Register.

Archaeological sites were first identified in the TFTA in 1973 during survey in the Blair Lakes area[81]. Surveys continued for archaeological district designations in the regions of Blair Lakes (District FAI-00335), Clear Creek Butte (District FAI-00336), and Wood

[78] Dixon et al. 1980
[79] Steele 1992, 1983
[80] Reynolds 1983, 1985
[81] Bradley et al. 1973

River Buttes (District FAI-00337)[82]. In 1993, proposed work in the Clear Creek Butte area prompted relocation of several archaeological sites[83]. Ninety-two new sites were found in 2009-2010 during survey of the Wood River Buttes, Salmon Loaf, and north and east of Blair Lakes. The district boundaries were adjusted in 2016 to accommodate the new discoveries[84]. Recent surveys have focused on the Blair Lakes region which has a long history of use dating from late glacial times to the more recent homesteading period and has also been a significant region for military activity—recreation and training. This area hosts the second oldest archaeological site in all of Alaska, the McDonald Creek site (FAI-02043), with stone tool debris dating to 13,900 years ago[85]. In total, archaeologists have identified 169 archaeological sites in TFTA. Of these sites, 25 have been determined eligible for inclusion in the National Register, thirty sites are not eligible and 114 remain to be evaluated for eligibility.

The road system in the YTA was the first of many areas to be investigated and eight sites were discovered during a 1978 road survey. A Determination of Eligibility (DOE) evaluation was conducted on one of these sites in 1979[86]. The Stuart Creek area was surveyed in 1992, but no archaeological sites were discovered; and the 1999 survey of Stuart Creek and the YTA road system uncovered one historic site[87]. Archaeologists have been surveying portions of YTA in conjunction with construction projects 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-two archaeological sites have been identified in YTA. Seventeen of the sites have been determined not eligible for listing in the National Register and five have not been evaluated. Surveys will continue in YTA in association with range development and timber sales requiring ground disturbance.

Archaeological investigations in what is now the DTA began in the 1960s[88]. The Donnelly Ridge site (XMH-00005) was excavated in 1964 and found an assemblage containing microblade core technology similar to early Holocene Denali Complex sites. Several surveys of Fort Greely and adjacent training lands in the late 1970s documented 64 new sites[89]. Various locations surveyed in DTA from 1980 to 1983 found four additional new sites[90], and one more site was located in the Donnelly Dome area in 1988 [91]. Investigations in DTA from 1992 to 2002 located sixteen new sites during this decade of fieldwork and attempted to relocate old sites [92] [93] [94] [95].

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[82] Dixon et al. 1980
[83] Staley 1993
[84] Carlson et al. 2017
[85] Esdale et al. 2014, Graf et al. 2018
[86] Cook 1979
[87] Higgs et al. 1999
[88] West 1967
[89] Rabich and Reger 1978; Bacon 1978; Holmes 1979b; Bacon and Holmes 1979
[90] Steele 1980a, 1980b, 1982a, 1982b, 1983a, 1983b
[91] Reynolds 1988
[92] Staley 1993
[93] Gamza 1995

Concentrated efforts to expand survey coverage of DTA East began 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 recent years, archaeologists have aimed to evaluate many known archaeological sites in DTA for inclusion on the National Register in conjunction with construction and use of the Battle Area Complex and its Surface Danger Zone. Sites have also been discovered during surveys for road and trail maintenance. Major excavations have taken place in training areas that have greatly increased our understanding of the prehistory of the area, including the middle Holocene Banjo Lake site[96] and the multicomponent Delta River Overlook (XMH-00297) and Hurricane Bluff (XMH-00838) sites[97].

Potential expansions into DTA West, west of the Delta River, prompted 2011 and 2012 surveys into new areas such as Molybdenum Ridge, where 21 new sites were discovered in 2011. Eleven surface sites were also found along Dinosaur Ridge in 2016. Due to its remote setting and the lack of range development, DTA West archaeology is still poorly understood and represents a gap in USAG Alaska's cultural property inventory.

To date, 491 archaeological sites have been identified within DTA. Fifty sites have been found to be eligible for the National Register, and 95 were found not eligible. An additional 346 sites remain to be evaluated. Historic archaeology sites are poorly represented in this region, with only four currently known to exist.

The Donnelly Ridge Archaeological District (XMH-00388) encompasses Denali Complex sites, south and west of Donnelly Dome. Two new prehistoric districts were identified in 2016, east and west of Jarvis Creek: the Jarvis Creek Archaeological District (XMH-01553) and the Heart among the Glaciers Archaeological District (XMH-01552)[98]. The goal of archaeological work in DTA is 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 scheduled for expansion of military training activities.

Despite its incomplete nature, the archaeological record known from DTA represents all currently recognized prehistoric cultures of the Alaskan Interior. Of significance is the role played by sites located on DTA in the definition of the Denali Complex of the American Paleoarctic Tradition[99]. The oldest dates for human habitation at DTA are roughly 10,100 years at site XBD-00167[100] and 12,000 years at Delta River Overlook (Potter et al. 2018); however, undisturbed stratigraphic deposits that are 12,800-12,930 years old indicate the potential for intact archaeological occupations of this age. Sites

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[94] Higgs et al. 1999
[95] Odess 2002
[96] Esdale et al. 2013
[97] Potter et al. 2018
[98] Carlson et al. 2016
[99] Anderson 1970; West 1967, 1981
[100] Higgs et al. 1999

yielding Northern Archaic side-notched points are common[101]. The Banjo Lake site yielded an AMS date of 5720 ± 50 BP from hearth charcoal associated with a microblade component[102]. A late prehistoric Athabaskan occupation is recognized at several sites[103]. Of particular interest in this regard is a copper projectile point found in a buried context at DTA at site XBD-00272[104]. Euro-American historic archaeological sites are also present[105]. The Delta River Overlook site (XMH-00297) may prove to be one of the most significant prehistoric sites in the region. The site, overlooking the Delta River from a high bluff, has deeply stratified deposits and contains evidence of at least twelve occupations over the time span of 2,000 to 12,000 years before present[106]. People using the site were hunting bison in the river valley and processing the animals on the bluff edge. This site provides important evidence concerning changing subsistence strategies and tool technology over time[107].

Survey efforts increased in 2013 in the BRTA in advance of the construction of a high-angle marksmanship range. Ten sites, eight of which were discovered during these surveys in 2013, are known from this rocky landscape. Four sites have been determined ineligible for the National Register, and all sites are small surface lithic scatters and isolated points as there is very little deposition in most of the mountainous training area. An additional surficial prehistoric site, XMH-01504, was found in the small WCTA to the south of BRTA in 2015.

Six sites were discovered at Tok Fuel Terminal in the early 1980s. Three of these sites have been found ineligible for the National Register (TNX-00006, 00007, 00008). These were relocated in 2013[108]. In 2015 and 2016, surveys of the landform found an additional seven sites. In total, two sites have been found eligible. The remaining six total sites have not been evaluated. This landform has also been identified as a Traditional Cultural Property. The Haines Fuel Terminal is the former site of the Tanani (Chilkoot) village and as homesteads following Tribal vacancy. The fuel terminal resulted in heavily disturbed land although land outside the fence line remain forested. One ineligible historic site is known for Haines Fuel Terminal (SKG-00043). Portions of the Haines Fuel Terminal were recently surveyed in 2022.

The GRTA is rarely utilized for range activities. Archaeologists surveyed small portions of GRTA in 2011 through 2013. Five prehistoric sites are known from this training area. One site, XMH-01494 was determined ineligible in 2013[109] and the remining four sites have yet to be evaluated.

[101] Robertson et al. 2004, 2005; Raymond-Yakoubian and Robertson 2005
[102] Esdale et al. 2015, Robertson et al. 2008
[103] e.g., Andrews 1975, 1987; Cook 1989; Mishler 1986; Sheppard et al. 1991; Shinkwin 1979; Yarborough 1978
[104] Robertson et al. 2009
[105] Gamza 1995; Phillips 1984
[106] Potter et al. 2018
[107] Potter et al. 2018
[108] Esdale et al. 2013b
[109] Esdale et al. 2013b

Archaeological surveys around Fort Greely began in the 1970s. Work covering the entire Fort Greely cantonment area began in earnest in 2002, covering 7,500 acres of land and identifying sixteen prehistoric archaeological sites. These are located mainly in the southern portion of the Fort Greely boundary. Eleven of the sites were evaluated for the National Register in 2010[110]. In summary, nine of the sites have been found not eligible and seven of the sites have been found eligible for the National Register. No known sites remain to be evaluated for the National Register. None of the sites have been radiometrically dated but two have diagnostic artifacts which were associated with the Denali Complex (XMH-00280) and Northern Archaic Tradition (XMH-01168).

3.2 Historic Buildings and Structures

The Fort Wainwright Main Post has been 100% inventoried and all period-appropriate resources have been evaluated for eligibility for inclusion on the National Register under World War II and Cold War historic contexts. The buildings and structures on the training lands and other associated parcels have also been inventoried. Both cantonment and training area buildings and structures are evaluated for NRHP eligibility as they reach 45 years of age.

The NPS conducted the first building survey of Fort Wainwright in 1984 as part of a regional, multi-site investigation related to the NHL thematic study of World War II in the Pacific. Erwin Thompson, Historian with the NPS Denver Service Center, wrote the nominations for multiple properties and objects throughout the study area. He identified the NHL's original extant buildings associated with the World War II era, including 24 buildings and structures centered on the runways. The designation of the Ladd Field NHL (District FAI-00236) was made in 1985 with a period of significance 1938-1945.

Beginning in 2018, re-evaluation of the Ladd Field NHL boundary and resources began with a reconsideration of what constituted a contributing resource, adding some buildings, revising the way the resources are recognized, and revising the period of significance to 1939-1945. The result was a boundary change with 18 contributing resources; the process completed in 2023 and official designation expected in 2025 (Figure 2).

Following the writing of *Northern Defenders: Cold War Context of Ladd Air Force Base Fairbanks, Alaska 1947-1961*, the Fort Wainwright Main Post was inventoried and evaluated, establishing the state recognized Ladd Air Force Base Cold War Historic District (FAI-01288). This district was determined eligible for inclusion in the National Register in 2001, with 94 proposed contributing resources and a period of significance of 1947-1961. It was re-evaluated and refined in 2010, at which time it was concurred to have 36 contributing resources (Appendix E Table 5).

[110] Gaines et al. 2010

Also, in 2010, USAG Alaska determined three buildings to be individually eligible for the National Register: Building 1060 (FAI-01257), Building 4391 (FAI-01789), and Building 4070 (FAI-01283). Previously, Building 1060 and Building 4070 had been part of the Cold War historic district. Building 1060 was concurred not eligible in 2016 due to a loss of integrity. In 2018, based on new data, Fort Wainwright's Bailey Bridge (FAI-02138) was re-evaluated and found to be eligible.

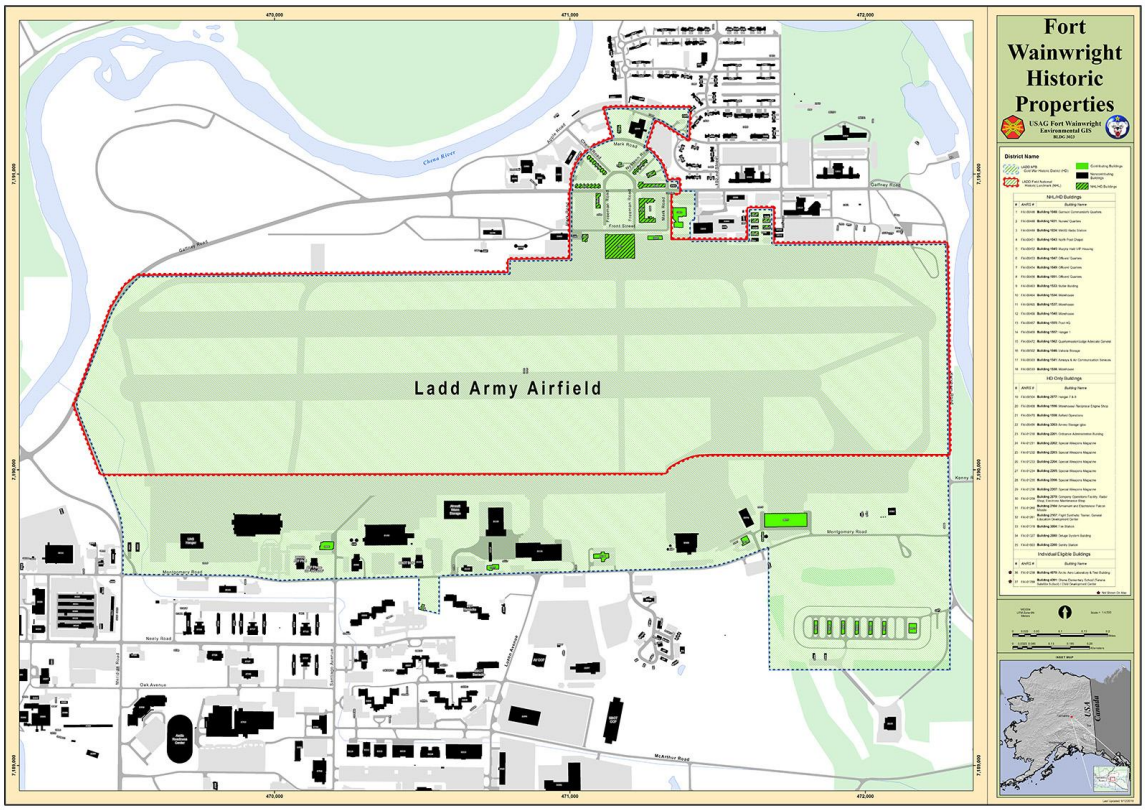


Figure 2. Ladd Field NHL and Ladd Air Force Base Cold War HD - revised.

Building survey work on Fort Greely began in 1997. In 1999, 26 Cold War-era buildings on Fort Greely were determined eligible for the National Register as the Fort Greely New Post Historic District (XMH-01275). In response to the realignment of Fort Greely, the installation and the SHPO entered a MOA in 1999 concerning these buildings and the Army agreed to mitigate any impacts to these structures by preparing a *Historic American Buildings Survey* (HABS). With the completion of the HABS recordation, the MOA allowed the Army to transfer, remodel, rehabilitate, or demolish any of these buildings without SHPO consultation. Since this time, Buildings 610, 614, and 659 have been demolished leaving twenty-three remaining buildings. As closure of Fort Greely was not completed, the agreement was considered void and, in 2021, a new evaluation was done of the district concluding that it was no longer eligible for the National Register due to loss integrity.

3.3 Properties of Traditional Religious and Cultural Significance

USAG Alaska is aware that properties of traditional religious and cultural significance to the Alaska Native community may be present on lands it manages. One SHPO-recognized Traditional Cultural Property (TCP), TNX-00067, has been documented at the Tok Fuel Terminal, locally known as Six-Mile Hill[111]. Efforts have been made to document culturally significant sites – here identified as TCPs, sacred sites, or areas of particular historical/cultural interest – by utilizing input from indigenous land users. Investigation of such sites in DTA resulted in the report entitled *Culturally Significant Site Survey: Donnelly Training Area, Alaska* (2008) and concluded there were none identified. Investigation of TFTA and YTA consisted of an indigenous place name study by qualified linguistic authorities. This study resulted in a GIS data layer that provides for the review of named locations prior to military development. USAG Alaska recognizes these types of studies often are not exhaustive and the Army continues to be open to new information on properties of traditional religious and cultural significance on the lands it manages as the information becomes available.

3.4 Documentation of Cultural Resources

The following sections summarize publications produced for or about Fort Wainwright cultural resources. Some of these publications can be acquired in hardcopy at the Cultural Resources Management Program office located in Building 3023 on Fort Wainwright, but as the program is attempting to approach paperless status, documents can be read or printed on demand from the program webpage, https://home.army.mil/wainwright/index.php/about/environmental/cultural-resources/public-outreach .

Additionally, the Cultural Resources Management Program disseminates information about cultural resources to the Fort Wainwright community and the greater public through lectures and classroom demonstrations; participation in local events; article publication in local and statewide publications; and distribution of information through social media, visitor bureaus, tourist destinations, and libraries, while supplies last.

3.4.1 Historic Context Reports

USAG Alaska has developed historic context reports in support of Section 110 and Section 106 of the NHPA. Current titles include:

- *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)
- *Early Electrification of Anchorage, Alaska (2002)*
- *The Haines-Fairbanks Pipeline* (2003)

[111] Simon and Gelvin-Reymiller 2002

- *The World War II Heritage of Ladd Field, Fairbanks, Alaska* (2004)
- *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)
- *Cold Missions: the U.S. Army Air Forces and Ladd Field in World War II* (2012)
- *The U.S. Air Force F-82 Twin Mustang and the Fate of 46-497* (2016)
- *Dispelling the Cold Bugaboo: A History of the Arctic Aeromedical Laboratory, 1947-1967* (2018)
- *The Alaska Highway: Its Origins, Construction, and Impacts (2019)*
- *Beacons of Civilization: Roadhouses of Donnelly Training Area (2019)*
- *The Great Arsenal of Democracy in Alaska: Lend-Lease Operations (2019)*
- *Their War, Too: The Women's Army Corps and Ladd Field (2019)*
- *The War Remembered: Life at Ladd Field During World War II (2019)*
- *Hiding in Plain Sight: Off-Post Military Sites of World War II and the Cold War, Fairbanks North Star Borough, Alaska (2022)*
- *Historic Context for the Pre-contact Era on Army-managed Lands in Alaska (2023)*

3.4.2 Annual Reports

The first archaeological survey of USAG Alaska-managed lands took place in the 1960s. Since that time, numerous reports on individual sites, full surveys, and effects of projects on archaeological sites have been completed. Since 2001, the results of those surveys have been compiled to produce reports submitted to the SHPO with redacted versions distributed to stakeholders and available on the Program's webpage (Appendix J). In 2018 these reports expanded into an activity report for all annual Program activities and have been formalized as a reporting deliverable for the O&M PA. Additionally, a second annual report is produced in response to the O&M PA which documents all the reviews of work orders performed by the Program.

3.4.3 Other Public Outreach

In addition to the contextual volumes, the Program publishes educational materials for students and brochures for public outreach across a wide range of topics associated with the various periods of interest throughout Fort Wainwright and Fort Greely's history. These are available, on a limited basis, in print and, perpetually, via print-on-demand through the Program's webpage. A series of fifteen interpretive panels throughout the installation educate viewers on historic properties and the National historic Landmark. USAG Alaska has developed a lesson plan on Ladd Field based on the NPS' *Teaching with Historic Places* standards and a teachers' toolkit on Alaska archaeology. The Program continues to participate in the installation's social media presence with educational materials.

3.4.4 Building and Structure Documentation

A number of buildings on Fort Wainwright have been documented using HABS standards including Buildings 1047, 1043, 1021, 1557, 1555, 1048, 1024, 1049, 1562, 3005, and 3008 on Fort Wainwright. The Bailey Bridge at Fort Wainwright was documented under HAER standards. Buildings 501, 503, 504, 601, 602, 603, 605, 606, 608, 609, 610, 612, 614, 615, 650, 652, 653, 655, 656, 658, 659, 660, 661, 662, 663, and 675 have been documented similarly on Fort Greely. A comprehensive condition assessment and rehabilitation plan and reuse study was conducted for Buildings 3005 and 3008. All buildings and structures over 40 years old on Fort Wainwright and Fort Greely have been surveyed, and their building survey information, including photographs, is on file in program offices. Determinations of Eligibility for the NRHP are completed as buildings and structures come of age or are needed in light of development undertakings.

3.5 Unique Cultural Resources Issues

Cultural resources under USAG Alaska management face numerous unique issues based on climate, topography, and latitude. Management of these resources under these conditions across 1.6 million acres requires considerable coordination to accommodate dramatic changes in temperature and light availability.

Work at archaeological sites is limited to a roughly-for month field season. Starting on or around June 1, field work can begin with complete snow melt and ground thaw and suitable temperatures for traversing the land or setting up camp in remote training areas. Decreasing temperature, increased risk of snowfall, and lowering light levels of fall prevent field work from continuing much past September 30, with an work requiring aviation support being completed prior to that due to the limitations of aviation VFR requirements.

Increasing temperatures in interior Alaska present increasing issues for archaeological sites with melting permafrost potentially putting organic materials at risk and causing degradation to sites. Increased wildfires also present issues, potentially burning over buried sites, damaging the duff and top soil layers. Care must be taken following forest ire to monitor for or mitigate for tree blow over, which can displace archaeologocial materials with root balls.

Fieldwork in the built environment must wait for completed snow melt to reveal building foundations. Any observed maintenance needs must be addressed promptly in early summer, as the exterior maintenance season is limited by temperature as late summer approaches.

Changes in atmospheric moisture levels (higher humidity) and precipitation predictability (erratic temperatures and snow/rain interchangeability) can produce conditions not previously experienced through historic structures such as mold, decay, ice damming, etc.

4 Goals and Objectives

The purpose of this section is to describe the proactive steps toward the integration of cultural resource concerns with day-to-day installation activities and mission requirements. These sections include descriptions of the desired conditions for historic properties at Forts Wainwright and Greely and describe management practices that will be employed toward these management goals.

4.1 Overall Goals

Overall goals are executed on an on-going or daily basis and are considered integral to all program activities. They cannot, therefore, be prioritized from most to least important. In general, they will be accomplished by:

- Ensuring that federal and contract support staff meet the professional qualifications set forth in the *Secretary of the Interior's Professional Qualifications Standards* (36 CFR 61).
- Ensuring that regular, adequate, and pre-decisional consultation is accomplished with governmental partners such as the ACHP and SHPO (quasi-regulators), the CLG and public stakeholders, and tribal government representatives.
- Ensuring that all relevant garrison programs/departments are engaged toward stewardship of resources IAW applicable laws and good practice.

Overall goals include:

- Comply with federal laws and regulations governing the treatment of historic properties in ways that meet and support USAG Alaska's mission.
- Develop efficient management procedures that streamline review of and consultation on undertakings. This includes continued review and expansion of the O&M PA.
- Continue professional development of staff through yearly applicable training.
- Recognize the special expertise of Alaska Native Tribal Governments and integrate indigenous knowledge wherever possible in management practices and research.
- Inventory and evaluate resources for eligibility to the National Register and a programmed and timely basis. This includes ensuring buildings and structures are evaluated at 45 years of age and archaeological sites are evaluated as needed to clear training space or when at risk of damage from recreation or training.
- Minimize intentional adverse effects on resources that are eligible for inclusion in the National Register and prevent vandalism and destruction of historic properties. This is accomplished through the use of signage and blockade, and through continuing education of users.
- Support the appropriate maintenance, repair, and rehabilitation of historic properties as identified and as funding is available through leveraged garrison partnerships. Participation in the Real Property Planning Board and interaction with building managers aid in seeking innovative future use and ensuring maintenance is performed as needed.

- Promote maintenance and repair activities in compliance with the Secretary of the Interior's Guidelines for the Treatment of Historic Properties. Educating DPW personnel aids in ensuring a compliance mindset when approaching maintenance and repair.
- Preserve significant historic properties whenever possible and mitigate appropriately in the long-term public interest when adverse effects cannot be avoided.
- Maintain confidentiality of the nature and location of archaeological sites.
- Programmatically manage archaeological sites to increase efficiency in a fiscally constrained environment. A five-year inventory, evaluation, and monitoring plan promotes co-located activities across 1.6 million acres and ensures appropriately timed benchmarks.

4.1.1 Archaeological Resources

The desired future condition for USAG Alaska's archaeological resources focuses on the need to preserve our heritage and manage cultural resources on USAG Alaska-managed lands in accordance with all applicable laws and regulations. Archaeological sites will be inventoried and evaluated to the greatest extent possible and as funding allows in order to facilitate increased use of training lands. When feasible, National Register eligible or not-yet-determined eligible sites will be avoided by ground disturbing military training and the siting of new construction. If avoidance is not feasible, protective steps will be taken to minimize damage to the site or mitigate, when adverse effects cannot be avoided. Those same sites will be monitored according to a prescribed plan (see Section 5.8.3). Management practices for these properties on USAG Alaska-managed lands have been developed through consultation with neighboring Alaska Native Tribal governments and other stakeholders.

4.1.2 Sacred Sites and Traditional Cultural Properties

USAG Alaska is aware that properties of traditional religious and cultural significance to Alaska Native Tribes may be present on the ancestral lands it manages. Identifying and managing these properties is a high priority in the sound management practices for cultural resources. Efforts have been made to document these sites, utilizing input from indigenous land users. To date, one report based on personal interviews and a GIS data layer resulting from an indigenous place name study have been produced to document known areas of cultural interest on DTA, TFTA, and YTA. While there are no identified Sacred Sites on the Army-managed lands, there is one Traditional Cultural Property (TCP) identified at the former Tok Fuel Terminal property. It is managed in concurrence with the SHPO and Tanacross Inc, the Alaska Native Corporation affiliated with the Native Village of Tanacross. The desired future condition for these resources is to identify and manage them in ongoing consultation with Alaska Native Tribal governments.

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 Alaska's goal is to maintain these historic properties' eligibility while adaptively reusing them to the maximum practical extent. Educating planners and users is necessary to increase awareness and acceptance of reuse. A desired future outcome is a more robust historic buildings condition assessment component that can be implemented in conjunction with the DPW Facility Management branch.

4.2 Planning Objectives

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

- Develop appropriate procedures to ensure all undertakings on USAG Alaska-managed lands meet standard review requirements.
- Develop, improve, and expand awareness of historic properties and their preservation by military and non-military personnel.
- Develop partnerships with Alaska Native tribes and other consulting parties toward obtaining technical assistance regarding historic property management on USAG Alaska-managed lands.
- Request and consider input from interested parties and Alaska Native Tribal governments 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.
- Update GIS data layers for traditional Alaska Native place names, archaeological sites, historic buildings and structures, and culturally relevant sites.
- Re-focus site monitoring to assess the effects of authorized activities on known archaeological sites.
- Develop and implement a plan to annually conduct DOEs on archaeological sites prioritized toward areas of heavy use and in potential development zones.
- Evaluate the six existing USAG Alaska archaeological districts for contributing/noncontributing sites.
- Re-evaluate the Ladd Air Force Base Cold War Historic District and Fort Greely Cold War Historic District.
- Develop a system to monitor maintenance and repair activities on historic buildings and structures.
- Streamline 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
- Survey unsurveyed areas anticipated for ground-disturbance by training activities.
- Coordinate with Range Control to ensure that Range, ITAM, and LRAM staff have access to up-to-date historic property data as needed for project planning.

5 Management Plan

5.1 Archaeological Resource Protection Act Procedures

The Archaeological Resource Protection Act (the ARPA) (16 USC 470), requires that all federal land managers inventory archaeological sites within their property boundaries and monitor these sites for damage or disturbance. Where needed, individual agreements have been put in place to protect archaeological sites in areas of heavy military development (e.g. Battle Area Complex Surface Danger Zone, DTA). Additionally, USAG Alaska has a site monitoring plan to visit eligible and not-yet-evaluated sites on a five-year cycle and a DOE plan to evaluate sites with priority given to those in high traffic areas. Vandalism has not been a problem on USAG Alaska-managed lands, but unmonitored construction and routine military activities may have affected archaeological sites in the past.

If inadvertent damage to a cultural resource is detected, the Cultural Resources Management staff 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 be taken (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 CRM 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 the ARPA. As per Section 6 of the 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.

Archaeologists affiliated with universities, museums, or other agencies consult USAG Alaska to conduct scientific site excavations. As per Section 4 of the ARPA (16 USC 470cc), permits for excavation on or removal of archaeological resources from USAG Alaska-managed lands can be distributed to the qualified applicant for the furthering of archaeological knowledge by the federal land manager. USAG Alaska issues the ARPA permits upon approval of the Garrison Commander in accordance with ER 405-1-12 and AR 405-80 and under a short-term lease with the DPW Real Estate Branch for undertakings that are not part of normal resource management by the installation.

5.2 National Historic Preservation Act's Section 110 Procedures

Section 110 of the 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. The Army, as an agency, has programmatically opted out of mandatory nomination and, instead, deems 'eligible' as an acceptable equivalent status for management purposes. Also, planning and other actions necessary to minimize harm to all NHL sites will be undertaken when a project may adversely affect such historic properties.

5.2.1 Minimizing Harm to National Historic Landmarks

For projects that may affect the Ladd Field NHL, USAG Alaska will consider the following alternatives in keeping with the spirit of 36 CFR 800.10:

Avoidance: This 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 Management staff will evaluate all projects and actions planned for implementation on lands owned, managed, or utilized by USAG Alaska 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—for minor, lower cost, shorter timeline projects—or Military Construction (MILCON) requests—for new projects or major repair/maintenance actions over $1,000,000.

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

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 Alaska staff, infrastructure maintenance contractors, and MILCON project proponents intending to initiate or permit projects, activities, or programs on USAG Alaska-managed lands will coordinate with the Cultural Resources Management staff to ensure the successful implementation of Section 106 responsibilities.

The Cultural Resources Management staff 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 Review of Undertakings

After a project has been determined to be an undertaking, the Cultural Resources Management staff 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 O&M PA.

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. These are:

Program Comment for Capeheart and Wherry Era Army Family Housing and Associated Structures and Landscape Features (1949-1962)
Program Comment for Cold War Era Unaccompanied Personnel Housing (1946-1974)
Program Comment for World War II and Cold War Era (1939-1974) Ammunition Storage Facilities
Program Comment for World War II and Cold War Era (1939-1974) Army Ammunition Production Facilities and Plants
Programmatic Memorandum of Agreement Regarding the Demolition of World War II Temporary Buildings
Program Comment for Department of the Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)

***Programmatic Agreement between the United States Department of the Army and the Alaska State Historic Preservation Officer Regarding the Operation, Maintenance, and Development of the Army Installation at Fort Wainwright and Associated Training Areas*. (O&M PA)**
In 2021, USAG Alaska renewed its 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 Tribal governments, ACHP, NPS, local governments, or other interested parties for the following undertakings. The first exhibit of the O&M PA, entitled Streamlined Review Process Criteria is found in Appendix I. The O&M PA was initiated in 2010, with an additional revision in 2016. It will be due for renewal in 2030, although annual review presents an opportunity for revisions.

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 size and characterization of the APE is determined on a case-by-case basis and is calculated based on the scale and nature of the undertaking. The Cultural Resources Manager may consult with SHPO, Tribal governments, and other consulting parties to provide expertise in the determination of the APE. Cumulative and visual effects may also influence the final APE.

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

Upon defining the APE, information must be collected about cultural resources within that boundary. The survey of the APE should yield information about known resources, allowing for their evaluation for eligibility in the National Register. While all resources do not qualify for inclusion in the National Register, those that do will be subsequently managed with this status in mind. Important to note is that 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 in the National Register.

The Cultural Resources Management staff 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 other data at the Alaska OHA, previously identified historic contexts for the region, local histories, and traditional knowledge. Information may also be available from local governments, Alaska Native entities, universities, and public and private groups and institutions. Resources for this review may also include, but are not limited to, the GIS inventory and USAG Alaska planning level surveys and historical data. Preliminary analysis may also involve the application of archaeological predictive models and the consideration of any known TCPs.

If the area has been investigated previously, the Cultural Resources Management staff 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 may be required to make a determination of eligibility. The Cultural Resources Management staff will determine the need for additional identification based on existing 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 Tribal governments, and other consulting parties will also be consulted and may participate in the identification and evaluation of historic properties. Methods for

conducting historic and archaeological surveys differ and 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*.

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 Forts Wainwright and Greely. Similarly, SHPO may have a statewide context against which the historic relevance of a resource can be weighed. USAG Alaska 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.

AHRS site forms will be completed and submitted to the OHA 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 following consultation with the SHPO and other consulting parties, an undertaking can proceed. If historic properties are identified in the APE, the Cultural Resources Management staff will evaluate resources for eligibility for the National Register.

5.3.5 Evaluating Eligibility

Making a determination of eligibility (DOE) is an evaluative process based on established criteria and guidance developed by the National Register Program. The process relies on two key concepts: *significance* and *integrity*. Both 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 C. 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, the property's' *significance*, or lack thereof, must be understood. To achieve this, the Cultural Resources Management staff will utilize existing historic contexts or develop new contexts based on sound research and following the *Secretary of the Interior's Standards for Preservation Planning.*

If determined *significant*, *integrity* must be evaluated. Integrity is the ability of the resource to convey that 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.

If the cultural resource meets one or more of the 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. In either case, SHPO concurrence is required for determination.

Lastly, the Cultural Resources Management staff will determine if the cultural resource represents a type usually excluded from the National Register. 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 Tribal citizenry recognizing the site's significance.

If the SHPO does not agree with USAG Alaska's finding of eligibility and USAG Alaska and the SHPO are unable to reach concurrence through further 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 as eligible for listing in the National Register. Determinations of effect will be made by the Cultural Resources Management staff with final determinations reviewed by the CRM.

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 diminish, directly or indirectly, 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 after 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 of the Interior's Standards for the Treatment of Historic Properties* and applicable guidelines.
- Removal of a 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 Tribal citizens.
- 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 Alaska determines that an undertaking will adversely affect a historic property, it 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 Tribal governments, Certified 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. However, 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 TCPs, USAG Alaska 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, Seibert stakes, 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 such as monitoring by an archaeologist or tribal citizen partner – when applicable—may be appropriate during construction. Such monitors observe that no inadvertent damage is inflicted to a property during construction activities, are available if post-review discoveries are made, and are utilized only during active construction.

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, signs, 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 TCP requires periodic monitoring through time to assess the effectiveness of implementation. 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 may include interested Alaska Native Tribal government representatives.

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 an adverse effect. 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.
- Other options of creative mitigation developed in consultation with stakeholders.

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 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*.

USAG Alaska acknowledges that the affected groups (such as Alaska Native citizenry) 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 TCP and is eligible for the National Register, USAG Alaska will consult with the appropriate parties to identify suitable mitigation measures. USAG Alaska will, to the extent practicable, provide protection for 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 Alaska will consider the following alternatives:

Avoidance: Avoidance of adverse effects altogether is accomplished by not proceeding with the undertaking or any 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: Minimization of an unavoidable adverse effect can be accomplished 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 periodic 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 Management staff will make recommendations to USAG Alaska leadership to 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*. 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 Alaska files. USAG Alaska 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

One NHL is located on the installations managed by USAG Alaska. The NHPA Section 110(f) requires USAG Alaska 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 the NHPA Section 110(a) (1), will ensure proper management of the NHL. Maintenance of contributing resources to 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*.

When an undertaking affecting the NHL requires consultation, USAG Alaska 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 Tribal governments and other interested parties as appropriate.
- Have mechanisms for feedback and an identifiable and consistent point of contact.
- 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).

5.6 Preservation and Protection Measure Strategies

Historic properties and those sites and structures that have not been evaluated are, therefore, treated as National Register eligible until determined otherwise, may be impacted by circumstances that do not prompt NHPA Section 106 review. Adverse climatic factors in the subarctic environment, wildfire, erosion, and recreational use may cause damage that is observed during monitoring activities. These are negotiated appropriately to prevent further, long-term deterioration.

The program exercises preservation practices for historic structures by monitoring building exteriors and preparing requests for maintenance service orders. While this is primarily a building manager duty, many facilities have multiple managers for whom this is an additional task. All are not sensitive to the needs of historic properties or materials. Program staff are sometimes better able to report maintenance needs and provide references and advice for engineers and maintenance staff leadership.

Within the training areas, archaeological sites that have been determined eligible or have not been evaluated are regularly monitored for disturbance by military activity,

recreational activity, animal activity, or climatic/elemental impacts. Observed disturbance is documented and investigated to determine the level of adverse effect. Dependent on the level of response required, a report will be made to the SHPO with an action plan for mitigating preset and future damage.

Historically, USAG Alaska-managed sites have been damaged by all of the mentioned causes. Most observed minor disturbances have been inconsequential and have resulted in the deployment of protective measures. Siebert stakes boundaries or hedgehog blockades

5.7 Post Review and Unanticipated Discoveries

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

In the event that previously unidentified archaeological materials are discovered during the execution of any undertaking,

- All ground disturbing activity shall immediately cease in the area of discovery and the installation contracting officer (if applicable) and environmental division staff will be notified. "Area of discovery" is defined as the area surrounding any discovered materials that is needed to ensure protection of the find or that which might contain additional materials. Ground disturbance may continue on the undertaking outside the area of discovery.
- The find should be secured until it can be evaluated by an Army-affiliated archaeologist or other personnel meeting the *Secretary of the Interior's Professional Qualification Standards for Archeologists*. This will occur as soon as logistically possible and with attention paid to undertaking timelines.
- The Army shall notify the SHPO and appropriate Alaska Native Tribal governments within 48 hours of discovery.
- The Army 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 Tribal government representatives may, upon request and as arranged by Army-affiliated personnel, inspect the work site to determine the nature and area of the affected archaeological site.
- In consultation with the SHPO and Tribal governments, the Army will determine the eligibility of the resource for inclusion in the National Register in a timely fashion.
- Work may resume in the area of discovery pending approval by the CRM and the SHPO.

In the event that human remains or funerary objects are discovered during the execution of any undertaking, the Army shall comply with all State and Federal laws pertaining to human remains and will approach this work with the deserved dignity and respect.

- All work at the site will cease and the remains will be secured in place from further disturbance or vandalism, as required by Alaska Statute 11.46.482(a)(3), until after the appropriate law enforcement authorities have ensured that the remains are not related to any crime or missing person, and until a plan for treatment has been developed.
- The Army shall notify the appropriate law enforcement authorities and the SHPO within 24 hours of the discovery.
- If the appropriate, qualified parties-- which may include, but are not limited to the State Medical Examiner or an Army-affiliated archaeologist-- determine that the remains are Native American, all work will cease and the installation will initiate consultation with the appropriate tribal governments to create a mutually-acceptable treatment plan in accordance with the NAGPRA as amended.
- If the remains are determined to not be Native American and criminal investigation is deemed unwarranted, the Army shall immediately notify the SHPO and consult with the SHPO to identify descendants or other interested parties, if any, and develop a plan for the respectful treatment and disposition of the remains.
- Work may resume in the area of discovery pending approval by the CRM and the SHPO.

If, during the course of the undertaking, there are any unforeseen or unanticipated effects to historic properties other than the identification of a previously unknown archaeological site or human remains, the Army shall initiate consultation pursuant to 36 CFR § 800.13(b)(3) to resolve the unforeseen effects.

5.8 Emergency Actions

There may be times that USAG Alaska 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 conclusion of a formal disaster or emergency and pursuant to 36 CFR § 800.12, the CRM will determine the necessary course of action to identify and mitigate damage to potential and known historic properties and the potential for salvage of any cultural resource data. Appropriate consulting parties, including the SHPO, tribes, and ACHP, will be notified of USAG Alaska's actions and afforded up to seven days to comment as time permits. These undertakings will be implemented within 30

days after the disaster or emergency event has been formally declared by the appropriate authority. Immediate rescue and salvage operations conducted to preserve life or property are exempt from these requirements. Documentation of emergencies will occur for the subject undertaking.

If the CRM determines data recovery and/or recordation is necessary, it will include, but not be limited to:

- 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 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 the NAGPRA. If the potential for salvage is high, a research design will be prepared and salvage may proceed when normalcy is restored. If it can be documented that there is little or no potential for salvage and the SHPO concurs, 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 Tribal governments.

5.9 Archaeological Site Monitoring, Survey, and Evaluation Methods

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

5.9.1 Principal Investigator Qualifications

The CRM will ensure that the principal investigator of archaeological surveys or excavations conducted on USAG Alaska-managed lands will meet the qualifications mandated in 36 CFR § 61.

5.9.2 Minimum Standards

Site monitoring, survey, and evaluation 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 CRM 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.

Archaeological Site Monitoring
The NHPA Section 110a and AR 200-1 Section 6-4 requires federal land managers to inventory, monitor, and keep current listings of historic properties. USAG Alaska monitors the condition of all known eligible or not yet evaluated historic and prehistoric archaeological sites on training lands. Sites will be monitored once every five years according to the prescribed plan and as funding allows.

Site monitoring aims to provide a baseline condition assessment of sites and to track site condition through time so that impacts from either natural or human impacts can be quickly identified and mitigated. Site monitoring will include:

- Site visit during snow-free conditions.
- Evaluation of current site condition.
- Mapping of site disturbance.
- Evaluation of changes to site since last visit.
- Site photographs.
- Identification of potential future impacts.

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 tests will be performed 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 glacial

till. All excavated sediments should pass through 1/8-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 Alaska has a minimal collection policy. Artifacts will be collected if: they are excavated in shovel test pits; if there is data potential (e.g., traceable, dateable); or, if diagnostic artifacts are found on the surface. These 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 will not be 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. The report must include documentation of 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 formation and post depositional transformation processes; relative or absolute temporal information; and artifact and feature spatial data. This documentation should be reinforced with relevant sources, site maps, and photographs.

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 a conclusive determination is proposed for concurrence by the SHPO.

Phase 3 Investigation

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

Phase 3 investigations occur only in cases where the site will be adversely impacted by an undertaking and after development of a 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.

Documentation
Results of archaeological surveys and excavations will be documented for inclusion in Section 106 review letters and NHPA reports, inclusion in the Administrative Record and submissions to agencies as necessary. The 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 ArcGIS.
- 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.
- Sediment, charcoal, pollen or other data analyses.

Archaeological Survey for Forest Management

Vegetation clearing for forest management that does not include ground disturbance is a frequent, year-round, activity on Fort Wainwright. Forest management includes tree and scrub clearing for fire breaks, mowing landing zones, maintaining lines of site, thinning trees for maneuver capabilities, and timber sales. These activities often cover large acreages and occur mainly during winter months. Many of these areas have not been previously surveyed for archaeological sites. Because there is extremely limited potential for disturbance of buried archaeological sites, USAG Alaska will not conduct archaeological surveys for these activities. If ground disturbance is planned, regular Section 106 procedures will be followed for areas where previous surveys do not exist. In areas that are previously surveyed, ground disturbance that is not affecting sites will fall under the O&M PA. Ground disturbance affecting sites will be subject to Section 106 procedures established above. In case of unexpected ground disturbance, inadvertent discovery procedures will apply. For the purposes of this ICRMP, hydro axing is considered a ground-disturbing activity and, where proposed, will be addressed on a case-by-case basis to ensure that surface or shallowly-buried sites will not be impacted. Survey will occur prior to hydro axing in previously unsurveyed areas and when ground in the area of activity is not frozen.

5.9.3 Five Year Work Plan

An integrated plan has been developed to address the three management activities addressing archaeological sites. Monitoring of eligible and unevaluated sites, evaluation of known sites, and survey triggered by Section 106 review are planned to holistically address the USAG Alaska inventory over a repeating 5-year cycle. Management activities are planned in order to carry out any of the needed activities in a concise geographic area to conserve and maximize resources.

Archaeological Site Monitoring Plan
Known sites that are eligible for the National Register or not yet evaluated will be monitored on a five-year cycle to evaluate condition, assessed for impacts from human or natural sources, and need for protection measures (Appendix G). Sites included in the monitoring plan are all those determined eligible for the National Register and those that have not yet been evaluated for the National Register. For efficiency, sites identified for monitoring each year are grouped by training area and are in number that is manageable during one field season. Site monitoring by training area is on the same schedule as the site evaluation plan to maximize resources, minimize redundancies, and ensure the maximum coverage in a short field season. In addition, sites may be monitored when located adjacent to newly developed survey areas. Planned monitoring areas may be substituted for others due to training area closures or other impediments.

Year 1 (2024): sites in DTA East
Year 2 (2025): sites in DTA East
Year 3 (2026): sites in YTA, Fort Greely, DTA East, and DTA West
Year 4 (2027): sites in Tok Fuel Terminal, GRTA, BRTA, TFTA, and WCTA
Year 5 (2028): sites in TFTA, DTA West

Archaeological Site Evaluation Plan
Sites will be evaluated for eligibility for inclusion in the National Register with priority given to those sites most at risk for impact and within 100 m of roads, trails, landing zones, bivouacs, and other human made features on the landscape. It is not the intent to achieve 100% evaluation of the USAG Alaska inventory, but to evaluate those sites located in areas of potential impact or opportunistically accessible, as times allows in the field season. This will allow Fort Wainwright to focus protective measures and open up more areas for mission requirements.

Year 1 (2024): sites in DTA East
Year 2 (2025): sites in DTA East
Year 3 (2026): sites in YTA, DTA East, and DTA West
Year 4 (2027): sites in Tok Fuel Terminal, GRTA, BRTA, TFTA, and WCTA
Year 5 (2028): sites in TFTA, DTA West

Archaeological Survey Plan
Archaeological survey efforts will be dictated by ground disturbing projects that occur outside currently surveyed areas and available funding for survey activities. As resources allow, archaeological surveys will attempt to open more training areas to unrestricted soldier digging and maneuvering.

5.10 Paleontological Resources

Paleontological resources (as defined in the PRPA, 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, only the USACE Permafrost Research Tunnel Facility on USAG Alaska-managed lands is known to contain paleontological material. Pleistocene fossils are known from the deep loess beds in the permafrost tunnel.

5.10.1 Responsibility

Although the PRPA is only applicable to DOI and Forest Service lands, AR 200-1 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 the management and limited of collection of paleontological resources. It is, therefore, the responsibility of the Garrison Commander and CRM to ensure that paleontological resources found in Army lands are identified, inventoried, protected, and curated.

5.10.2 Procedures

Paleontological resources will be inventoried by the Cultural Resource Management staff in conjunction with standard archaeological surveys, inventories, and Section 106

procedures. If any individual fossils or fossil sites are discovered, the CRM will consult with a qualified paleontologist from the UAMN. Curation of paleontological resources is covered by an existing IGSA with the UAF.

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 CRM.

5.11 Historic Buildings Maintenance and Assessment

The Cultural Resource Management Program is dedicated to promoting the management of USAG Alaska'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 purpose of this plan is to assist other divisions within DPW by monitoring maintenance, repair, and rehabilitation efforts affecting USAG Alaska's historic buildings and report needs for the same as they are seen for work as funding for their preservation and maintenance is available.

Current procedures used by the Cultural Resources Management Program to assist with the maintenance needs for Forts Wainwright's and Greely's historic buildings include:

- Utilizing qualified professional staff.
- Recording historic buildings, historic documentation, and in-depth building studies.
- Reviewing project requests.
- Monitoring project development and execution.
- Assessing maintenance needs of historic buildings.
- Submitting work orders as needed.
- Integrating information into large-scale planning documents.

5.11.1 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 the surrounding historic buildings or districts. To aid federal agencies in making sensitive changes to historic buildings, the NPS 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 Management 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 Management Program utilizes ~~a professionally~~

~~trained staff~~ Subject Matter Experts, historic documentation, in-depth building reports, and an established project review process to help maintain any historic buildings on Forts Wainwright and Greely.

Staff Qualifications
The Cultural Resource Management staff is comprised of a full-time staff that has the education, background, and professional experience needed to effectively monitor and advocate for Forts Wainwright and Greely's historic building maintenance needs. The education, background and professional experience is required under 36 CFR 61 and detailed in the *Secretary of the Interior's Professional Qualifications*.

Building Recordation and Studies
The Cultural Resource Management staff frequently utilize 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 Alaska'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 considered for future development projects.

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 Ladd Chapel Structural Assessment, and multiple HABS.

In the event that it is determined demolition is required for a historic property, the mitigation for this undertaking will include the preparation of HABS documentation to a level determined appropriate in consultation with the SHPO. Photo documentation is also performed when historic properties are slated for extensive exterior renovation. These materials are used in the consultation process for these undertakings. Photographs are also taken after the undertaking is completed to document that the predicted outcomes of the mitigative activities were executed.

Project Reviews
For compliance purposes, all work on USAG Alaska-managed 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 Management Section.

Work orders are standardized forms that are required when a building manager or DPW personnel are requesting maintenance or repair of any infrastructure on the installations. During the environmental review of the work order, the CRM reviews the request and determines if there is a potential to affect any historic buildings. If there is, then the CRM adds information to the work order, including possible ways to avoid, minimize, and/or mitigate the effects. Additionally, the CRM contacts the proponent of the request and the project manager, if one has been assigned, to discuss the scope of work and its impact 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 CRM 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. During this review, the CRM 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 CRM 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 receive funding and in that time may be altered or combined with other work orders. The CRM reviews the 1-n[112] list to verify which projects have been approved for the current fiscal year and the priority listing of the projects.

5.12 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 the NHPA Section 304. USAG Alaska and the SHPO have an annual renewable agreement in which the State of Alaska agrees to share historic properties site location information with the Cultural Resources Management staff.

[112] A list compiled through DPW, which states projected, funded, and prioritized projects over the next year in priority of "1" to however many "n."

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

USAG Alaska'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 is not included and that references are redacted.

USAG Alaska's signage will be generic as to not identify cultural sites on the landscape.

The 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 Alaska-managed lands is the NEPA process outlined in 40 CFR § 1506.6 "Public Involvement." AR 200-1 and Section 106 also provide procedures for involving the public.

Participants in public involvement in general include:

- Public Affairs Officer
- SHPO
- NPS, Alaska Region
- BLM, Eastern Interior Field Office
- Alaska Native Tribal governments
- Alaska Native Corporations (village and regional)
- Other Alaska Native entities as appropriate
- Other federal or state agencies
- General public
- Local governments
- Other interested parties

In accordance with EO 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 (Appendix J).

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.

5.13 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 Alaska-managed land is the responsibility of the CRM, acting on behalf of the Garrison Commander.

The 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 Alaska installations.

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

The CRM will ensure that all artifacts recovered as a result of Army undertakings on USAG Alaska-managed lands are properly curated, through an agreement with the UAMN. USAG Alaska has procedures in place for curation of artifacts recovered from USAG Alaska-managed lands and procedures so that all fieldnotes, photographs, geospatial data, and any additional program related document meet preservation standards in accordance with 36 CFR 1220 and 36 CFR 1228. 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 CRM will include the costs of curation as part of the overall project costs.

Contact information for the UAMN is Archaeology Collections Manager, University of Alaska Museum, P.O. Box 756960, Fairbanks, AK 99775, (907) 474-6943.

5.14 Capacity Building for Alaska Native Tribes

The Cultural Resources Management Program may place significant demands on the regulatory, administrative, and management structure of Alaska Native tribal governments. USAG Alaska may provide technical assistance to aid tribes with understanding USAG Alaska documents and ensure access to culturally significant sites when requested.

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

Development of mutually beneficial agreements between USAG Alaska and Alaska Natives tribes can also build tribal capacity significantly. Such agreements would be accomplished through work sessions between USAG Alaska 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.

5.15 Incorporating Traditional Knowledge into Cultural Resources Management

USAG Alaska 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 Alaska 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 Alaska-managed lands.

This section of the ICRMP is intended to apprise the CRM, 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 particular people who are linked through various economic, cultural and religious activities.

- 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 must not be overlooked or discounted in resource management simply because it may not take 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.

5.15.1 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 the NHPA Section 106, sacred sites under EO 13007, the AIRFA, and the NAGPRA.

The 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 should not be addressed by an entity outside of the tribe.

For the purposes of this ICRMP, it is the responsibility of the tribe, not USAG Alaska, 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 Alaska on the qualifications of who may be a traditional knowledge holder.

5.15.2 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 the NHPA 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)).

5.15.3 Confidentiality

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

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

USAG Alaska 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 Alaska 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

AR 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.
- Documents specific ICRMP action accomplishments undertaken each year.

Recurring and statutorily required cultural resources project requirements are funded through Army funding allocation models and prioritized based on mission requirements and compliance with cultural resources laws and regulations. Additional funding is requested for one-time projects such as Military Construction or stationing actions. All projects listed in an ICRMP are not necessarily a 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 Management Program includes all the tasks required to plan, organize, implement, and operate the Cultural Resources Management Program for USAG Alaska. Goals for Cultural Resources Management Program implementation are:

- Enable USAG Alaska to maintain compliance with the 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 Reports and data calls regarding the status of cultural resources 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.
- Perform tasks to support historic properties in a way that contributes to supporting readiness and sustaining the mission.

6.2 Reporting

USAG Alaska is responsible for submitting reports for funding requirements, funding work plans, and environmental quality status. USAG Alaska must annually submit the data on the status of cultural resources on the installations and the Installation Status Report.

6.3 Agreements

AR 200-1 directs that, where applicable, an installation should enter into agreements with state and federal conservation agencies for the preservation and stewardship of cultural resources. Federal agencies, including the Army, must engage in full and open competition in accordance with the Defense Federal Acquisition Regulation (DFAR) 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. Much of the work laid out in this plan will be accomplished through agreements with various entities.

MOAs, IGSAs, and CAs will be pursued to accomplish the described tasks as funding allows and while within the best interest of the federal government and USAG Alaska.

6.4 NHPA Section 106 Agreements

Agreement documents—PAs and MOAs—executed pursuant to of the NHPA Section 106 and its implementing regulations at 36 CFR § 800 are compliance agreements that set forth how the Army will satisfy its responsibilities in the event that an Army undertaking affects a historic property. Section 106 PAs that address and define ongoing installation-wide undertakings associated with mission activities and their effects on historic properties are encouraged, as they can streamline NHPA compliance 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)
- The Monitoring and Treatment Plan of Archaeological Sites Located Within the Surface Danger Zone of the Battle Area Complex Training Facility at Fort Wainwright, Donnelly Training Area (FW-PA-1003)
- 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 (FW-PA-1207)
- Archaeological Excavation and Mitigation of the McDonald Creek Site (FAI-02043) TFTA (FW-MOA-1409)
- Data Recovery Mitigation for Firebreak Maintenance and Disturbance at XMH-01303 (FW-MOA-1505)

- The Operation, Maintenance, and Development of the Army Installation at Fort Wainwright and Associated Training Areas (FW-PA-1015, renewed as FW-PA-1601)
- Archaeological Excavation and Mitigation of XMH-00917, DTA East (FW-MOA-1619)
- Archaeological Excavation and Mitigation of XMH-00292 and XMH-00923, Donnelly Training Area East, Fort Wainwright (FW-MOA-1726)
- Installation of Systems to Support AVCATT Simulators (FW-MOA-1731)
- Renovations of Building 2077 (FW-MOA-1732)
- Construction of a Hangar for the Gray Eagle UAS (FW-MOA-1803)

6.5 Organizational Enhancement, Roles, and Responsibilities

6.5.1 Cultural Resource Organization

The Conservation Branch is a sub-component of the DPW Environmental Division. The Cultural Resources Management Program is a part of the Conservation Branch.

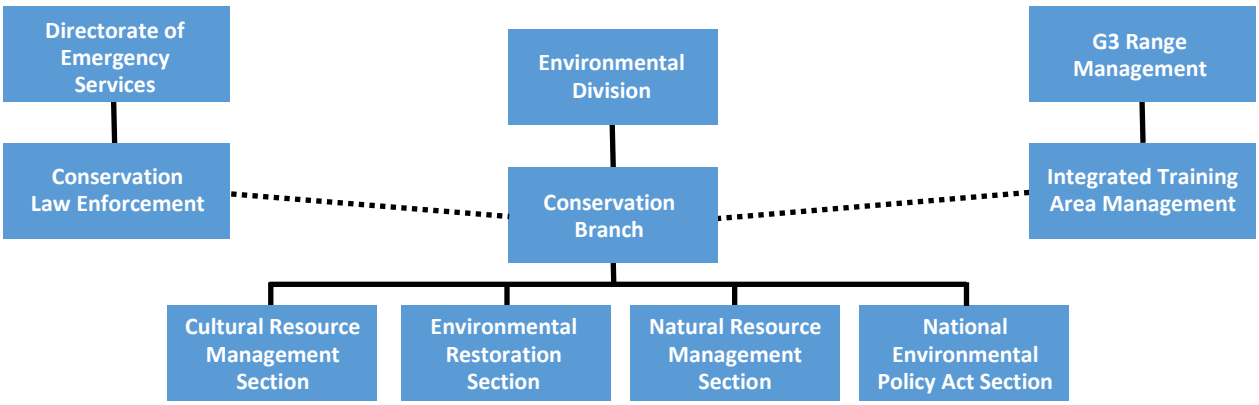


Figure 4. Conservation Branch Organizational Chart

6.5.2 Staffing

The management and conservation of cultural resources under Army stewardship is an inherently governmental function. The provisions of AR 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 Management staff, where it is severable from management, planning, implementation, or enforcement actions of cultural resources, may be subject to the provisions of AR 5-20. Personnel positions associated with activities that support (on an as-needed basis) the Cultural Resources Management staff (for example, field crews) may be subject to the provisions of AR 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 Alaska is also directed by AR 200-1 to seek technical assistance from appropriate cultural resources agencies (federal, state, and local). As needed, USAG Alaska will hire specialized expertise needed for some projects within this ICRMP. This expertise may come from universities, governmental agencies, and contracting entities.

Federal In-house Capabilities: USAG Alaska has limited in-house federal positions as a result of manpower restrictions. There is currently one full-time Department of the Army civilian position.

Federal Agency Support: USAG Alaska may utilize personnel support from other federal agencies, however, this option has not been used previously. These types of personnel meet the requirements for "government in nature" positions for planning for, management of, and enforcement for cultural resources.

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

6.5.3 Qualifications

Pursuant to the NHPA Section 112, 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.

6.6 Coordination

A blended workforce can also contribute to chain-of-command challenges. Therefore, USAG Alaska has instituted a framework of conservation and cultural resource teams, in-progress reviews, and periodic training to meet these challenges.

6.6.1 Training

Interdisciplinary training is essential for DoD CRMs 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.

Appropriate training will assist the CRM in carrying out cultural resources management activities on Forts Wainwright and Greely, ensuring compliance with historic preservation laws.

Educating the USAG Alaska staff on cultural resources laws and regulations will assist in achieving and maintaining compliance. Basic training for unit commanders, environmental officers, and others on historic preservation laws and regulations and on the history of Forts Wainwright and Greely will provide them with the necessary tools to be good stewards of the historic properties on the installations.

The CRM will offer training, as needed, for any tenant or outside agency to understand the requirements for coordinating a project with the Cultural Resources Management staff and will coordinate all undertakings by tenants or outside agencies that affect a historic property with the SHPO, ACHP, and interested parties.

The Cultural Resources Management staff has developed curriculum, in consultation with the SHPO, for an internal training of USAG Alaska DPW staff and contractors concerning a variety of preservation concerns and providing a greater understanding of the considerations to be considered during project planning and execution.

6.7 Outreach

Each Cultural Resources Management Program subject area participates in public outreach activities through the environmental division webpage, social media, classroom visits, media outlets, and installation and community events. A Cultural Resources Working Group of community stakeholders assists with outreach and serves as a sounding board and advisory body for continued outreach development.

6.8 Financial Management and Funding

Establishing and executing a budget is a responsibility of the CRM. The intent of the funding section of this ICRMP is to link resources with the established goals. The funding section of this plan will be used to develop and support environmental funding requirements. Activities designed to identify, evaluate, assess, stabilize, and report are eligible for environmental funds when such undertakings are developed in accordance with professional historic preservation standards and guidelines established by the Secretary of the Interior.

6.8.1 Environmental Funding

The purpose of environmental funding is to enable the Army mission by enabling the approved categories of work involved in resources management. All activities outlined in the ICRMP will be performed subject to the availability of funding. 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. Funding for cultural resources requirements, recurring and non-recurring, is modeled as described in Section 6.0.

6.8.2 Facilities Funding

Army facility support is funded through Sustainment, Restoration, and Modernization (SRM) funds. The purpose of SRM 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. Restoration funding is intended 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.

6.8.3 Budgeting

The Environmental Division partners with the garrison Resource Management Office to manage the environmental budget. An obligation plan (cultural resources management is included in this) is utilized to communicate planning requirements and to help manage the annual budget.

6.8.4 Contracting

The contracting process includes two primary components: (1) purchase and acquisition and (2) contract management. Purchase and acquisition is necessary to establish and let a contract and 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. The USAG Alaska Environmental Division starts the process by clearly defining desired services in a Performance Work Statement (PWS), estimating costs, and initiating a purchase request. The USAG Alaska Environmental Division works with a contracting agency to develop an acquisition strategy, which is approved by the Garrison Commander at the Acquisition Review Board.

The Economy Act of 1932, as amended, allows federal agencies to obtain services directly from other federal agencies or utilize contracts and cooperative agreements

already in place by other federal agencies. The Military Interdepartmental Purchase Request is used to acquire cultural resources services. Using this process, USAG Alaska will utilize an agency such as the USACE or the U.S. Forest Service for procurement of services.

Contract Management: Once a contract mechanism is in place, the USAG Alaska Environmental Division must nominate a federal employee to act as the Contracting Officer's Representative or technical representative the execution of the work. The Contracting or Grants Officer authorizes the representative to verify that the contractor or agency performs to the technical requirements of the PWS, perform necessary inspections, maintain liaison and direct communication with the contractor or agency employee, monitor the contractor's performance, submit a report concerning performance of services rendered, and coordinate site entry for contractor and other agency 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.

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Appendix A. 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 after 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 or physical evidence of human habitation, occupation, use, or activity, including the site, location, or context in which such evidence is situated.

Archaeological 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.

Area of potential effect means the geographic area(s) within which an undertaking may directly cause changes in the character or use of historic properties, if any such historic properties exist.

Building means a construction (e.g., house, hotel, church, etc.) created principally to shelter any form of human activity.

Consulting parties are those parties that have a consultative role in the NHPA Section 106 process and for the purposes for the implementation of the ICRMP, consulting parties can include the SHPO, BLM, NPS, federally-recognized Alaska Native tribes, representatives of certified local governments, non-governmental entities considered to be local stakeholders in heritage resources, and applicants for federal permits, licenses, assistance or other forms of federal approval.

Consultation means the formal process of seeking, discussing, identifying and considering the views of consulting parties.

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 Alaska, usually 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 (or culture). It can be referring to a

historic property as defined in the NHPA; a cultural item as defined in the NAGPRA or by a federally recognized Indian tribe; an archaeological resource as defined in the ARPA; a sacred site as defined in EO 13007 to which access is provided under the AIRFA; or collections as defined in *Curation of Federally-Owned and Administered Collections* (36 CFR 79).

Cultural Resources Manager (CRM) is the individual with the appropriate knowledge, skills, professional training, and education and designated by the Garrison Commander, in accordance with AR 200-1, to coordinate the NHPA compliance and other cultural resources management responsibilities. The CRM 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 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 a 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 Tribe, for the purposes of the ICRMP, means: (i) an American Indian tribe, band, nation, pueblo, village, or community within the 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, is charged with providing Base Operations Support to all activities and personnel on the Program Objective Memorandum. The Garrison Commander directs, oversees, and coordinates garrison staff.

Government-to-government relations, for the purposes of this document, means relations formally established between USAG Alaska and federally recognized Alaska Native Tribal governments. In recognition of a federally recognized Tribe's status as a sovereign nation, formal government-to-government relations are established and maintained directly between Garrison Commanders and Tribal government leaders.

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. 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).

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 lands and facilities located in the same vicinity, which are under control of the Army and used by Army organizations. In addition to those used primarily by Soldiers, the term also applies to other real properties such as depots, arsenals, ammunition plants, hospitals, terminals, and special mission installations. The Garrison Commander is responsible for installation management and operation.

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 a 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.

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 deactivating a building or structure and its component to protect the resources planning for its future use. It is considered an undertaking and must be accomplished in accordance with the guidelines laid out in DoI NPS Preservation Brief 31.

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 (36 CFR 60).

Native Liaison is the individual designated by the Garrison Commander to facilitate the government-to-government relationship with federally recognized Tribal governments. The Garrison Commander will ensure that the Native Liaison has appropriate knowledge, skills, professional training, and education to conduct installation consultation responsibilities. The Native Liaison is also responsible, when designated, to carry out staff-to-staff consultation actions with federally recognized Tribal governments. 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, relatively small in scale, sometimes simply constructed, and not for human habitation. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

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 that, when severed from the land, become personal property. Rights 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, alteration, and addition 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 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.

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 archaeological value regardless of the value of any existing structure.

Sovereignty, with respect to federally recognized American Indian Tribal governments, 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 Alaska 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 the NHPA of 1966, as amended, to administer the state historic preservation program or representative designated to act for the SHPO.

Streamlined activities refers to USAG Alaska's undertakings the meet the criteria set forth in the O&M PA and have been consulted on in a wholesale manner. USAG Alaska does not consult with SHPO on these individual undertakings as they have little to no potential to adversely affect historic properties.

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.

View 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 B. Commonly Used Acronyms

11th ABN DIV	11th Airborne Division (formerly USARAK)
ACHP	Advisory Council on Historic Preservation
AHRS	Alaska Heritage Resources Survey
AIRFA	American Indian Religious Freedom Act
ARPA	Archaeological Resources Protection Act
APE	Area of Potential Effect
AEC	Army Environmental Command
AR	Army Regulation
BRAC	Base Realignment and Closure
BRTA	Black Rapids Training Area
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CA	Cooperative Agreement
CRTC	Cold Regions Test Center
CRM	Cultural Resources Manager
DoD	Department of Defense
DOE	Determination of Eligibility
DPW	Directorate of Public Works
DTA	Donnelly Training Area
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
GIS	Geographic Information System
GRTA	Gerstle River Training Area
HQDA	Headquarters, Department of the Army
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
ICRMP	Integrated Cultural Resources Management Plan
IGSA	Intergovernmental Support Agreement
IMCOM	Installation Management Command
ITAM	Integrated Training Area Management
LRAM	Land Rehabilitation and Maintenance
MILCON	Military Construction
MOA	Memorandum of Agreement
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
NWTC	Northern Warfare Training Center
OHA	Office of History and Archaeology
O&M PA	Operations and Maintenance Programmatic Agreement
PA	Programmatic Agreement

PRPA	Paleontological Resources Protection Act
REC	Record of Environmental Consideration
SOP	Standard Operating Procedure
SHPO	State Historic Preservation Officer
TFTA	Tanana Flats Training Area
TCP	Traditional Cultural Property
UAMN	University of Alaska Museum of the North
USACE	U.S. Army Corps of Engineers
USAG Alaska	U.S. Army Garrison Alaska
USAG Greely	U.S. Army Garrison Greely
USC	United States Code
WCTA	Whistler Creek Training Area
YTA	Yukon Training Area

Appendix C. Summary of National Register of Historic Places Criteria

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.

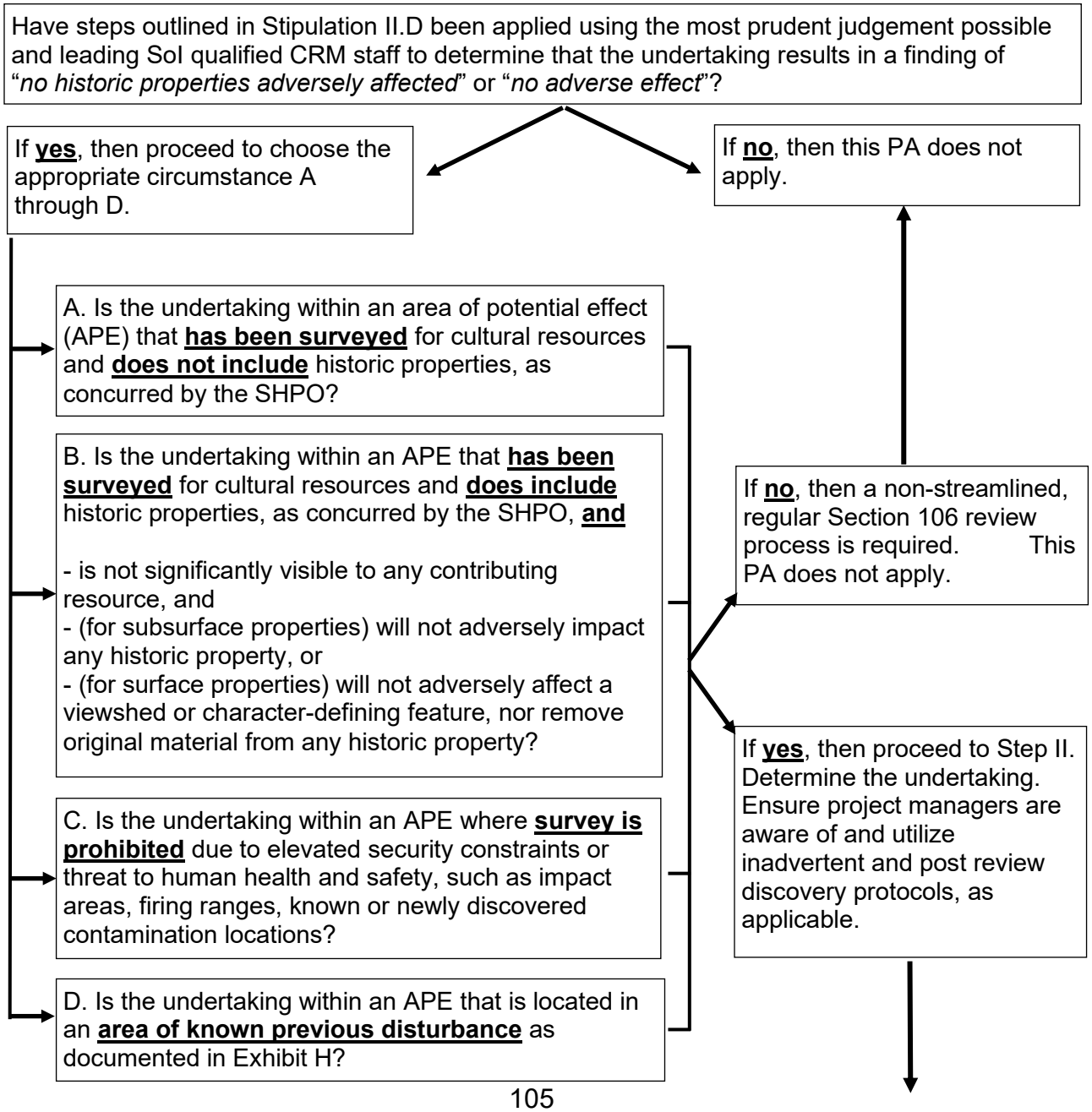
Historic Context: Historic context provides the framework for evaluating specific properties. Historic context consists of the patterns and trends in history or prehistory, organized by theme, place and time, which allow a property to be understood. Contexts can be local, regional, or national in scope, 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 D. O&M PA Streamlined Review Process Criteria

Exhibit A:
Implementation of the Streamlined Review Process and Accepted Criteria

Stipulation II.D will be applied to all undertakings. If the Streamlined Review Process is applicable, the following Steps I and II will be followed and determinations will be recorded in an annual report per Stipulation VIII. This process will satisfy the installation's compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 as implemented by 36 CFR 800.

Step I.



Step II. The following streamlined undertakings have been consulted on for the purposes of an alternative compliance with NHPA Section 106 review and agreed to by signatories of this Programmatic Agreement.

1. External and Administrative Work, including:

a. Repair, replacement, maintenance, hardening, installation, or removal of retaining walls or other slope stabilization systems.

b. Repair, replacement, maintenance, installation, or removal of culvert systems.

c. Repair, replacement, maintenance, hardening, or installation of underground utilities (e.g. sewer, water, storm drains, electrical, gas, communication, or similar) and above-ground utility access points within previously disturbed rights of way or under existing roads or walkways.

d. Repair, replacement, maintenance, or installation of, driveways, parking lots, bike paths, dumpster collection areas, or walkways, to include paving/resurfacing of existing hardened areas, where the proposed work does not exceed the depth and breadth of previously disturbed soil and any material composition is sympathetic to adjacent historic properties.

e. Repair, replacement, maintenance, installation or removal of headbolt heaters, light posts, street signs, charging stations, and power meters as necessary for public safety or to meet Army energy use mandates.

f. Repair, replacement, maintenance, installation, or removal of communication equipment such as cellular towers and related equipment.

g. Repair, replacement, maintenance, installation, or removal of temporary structures to include tents, classrooms, storage sheds, foot bridges, and construction equipment, provided such items are not prominent in the viewshed of a historic property.

h. Repair, replacement, maintenance, installation, or removal of temporary equipment such as generators, weather monitoring equipment, airfield management equipment, and military devices provided such items are not prominent in the viewshed of a historic property.

i. Repair, replacement, maintenance, installation, or removal of temporary barriers (e.g. jersey barrier, chain link fence, or similar), polyethylene sheeting, or tarps, provided such items are not prominent in the viewshed of a historic property.

j. Maintenance or repair of existing landscape features, including plantings, trees, and shrubs provided that any new vegetation is a replacement in-kind of existing or historic planting in regard to location and species.

k. Repair, replacement, installation or removal of signage, not affixed to nor within the viewshed of historic properties.

l. Repair, replacement, or extension of utility or pipelines in areas where the proposed work does not exceed the depth and breadth of previously disturbed soil.

m. Performance of geotechnical testing, environmental sampling, shovel tests, or other standard survey activities. (*for non-Restoration activities; Restoration see 7.g.*)

n. Repair, replacement, maintenance, installation, or removal of play equipment and surfacing, sports courts, and ballfields.

o. Issuance or renewal of administrative real property vehicles, including but not limited to permits, leases, or rights-of-way where no new construction, footprint extension, or greater than in-kind replacement will occur.

p. Maintenance and repair; rehabilitation; renovation; mothballing; cessation of maintenance; new construction; demolition; deconstruction and salvage; remediation activities; and transfer, sale, lease, and closure of World War II and Cold War era ammunition storage facilities. [*per ACHP Program Comment and included to maintain consistency of the administrative record*]

q. Maintenance and repair; rehabilitation; layaway and mothballing; renovation; demolition and replacement; and transfer, sale, or lease out of Federal control of Capehart and Wherry Era Army family housing, associated structures, and landscape features. [*per ACHP Program Comment and included to maintain consistency of the administrative record*]

r. Maintenance and repair; rehabilitation; renovation; mothballing; cessation of maintenance; new construction; demolition; deconstruction and salvage; remediation activities; and transfer, sale, lease, and closure of Cold War era unaccompanied personnel housing (UPH). [*per ACHP Program Comment and included to maintain consistency of the administrative record*]

s. New construction or demolition of other construction not otherwise listed after confirming records for accuracy of eligibility and outside of the boundary or viewshed of historic properties/districts.

t. Repair, maintenance, or construction of drainage features such as ditches or berms or similar.

u. Maintenance, repair, rehabilitation, renovation, abatement of hazardous materials, mothballing, cessation of maintenance, demolition, new construction, lease, transfer, conveyance, and the use of modern industry standard building materials and methods in the implementation of management actions of Vietnam War era housing. (per ACHP Program Comment and included to maintain consistency of the administrative record)

2. <u>Roads, Trails, Railroads, Airstrips, and Landing and Drop Zones, including</u>:

a. Repair, replacement, construction, removal, or maintenance using in-kind materials. For road or trail maintenance/construction this includes the number and width of lanes, shoulders, medians, curvature, grades, clearances, and side slopes.

b. Minor widening of roads and trails less than ten feet beyond the existing rights-of-way.

c. Repair, replacement, maintenance, installation, or removal of traffic control devices such as traffic signs, delineators, streetlights, traffic calming devices, safety barricades, pavement markings, and similar.

d. Repair, replacement, maintenance, construction, or removal of linear features such as fences, sidewalks, bike paths, curbs, guardrails, gates, and similar.

e. Repair, replacement, maintenance, construction, or removal of railroad track, ties, crossing signals, safety components, and crossings.

f. Repair, replacement, maintenance, construction, expansion, or removal of airstrips, drop zones, or landing zones.

g. Repair, replacement, maintenance, construction, or hardening of trails.

3. Building Activities – Interior Work, including:

a. Repair or replacement of any interior finish.

b. Repair, replacement, maintenance, installation, or removal of any furnishing, appliance, device, system, or system part.

c. Removal or installation of interior walls.

4. Buildings Activities --Exterior Work, including:

a. Repair, replacement, construction, or removal of porches, siding, doors, stairs, trim, or similar.

b. Repair replacement, construction, or removal of roofing, awnings, soffits, or fascia boards.

c. Application or in-kind replacement of snow guards on roof surfaces.

d. Repair, replacement, installation, or removal of signage.

e. Repair, replacement, installation, or removal of outdoor lighting fixtures.

f. Repainting of surfaces.

g. Repair, replacement, installation, or removal of windows.

h. Temporary stabilization bracing or shoring.

i. Repair, in-kind replacement, obstruction, or bracing of chimneys and fireplaces.

j. Repair or maintenance of masonry foundations, walls, or chimneys.

k. Repair, replacement, maintenance, installation, or removal of security and safety features, such as window bars, security lighting, ladders, and emergency lighting.

l. Repair, replacement, installation, or removal of gutters and downspouts.

5. Military Training and Testing, including:
   a. Dismounted (on foot, ski, snowshoe, etc.) or aviation (when flying or landing in approved areas) maneuvers.
   b. Vehicular maneuvers and training that result in ground disturbance on Army-managed lands
   c. Weapons qualification exercises on existing ranges.
   d. Continued use of existing training roads and trails.
   e. Testing of materiel, methods, or equipment.
   f. Pushing of berms and digging of foxholes, trenches, and similar, by hand or mechanical means on Army-managed lands.
   g. Training lands clean-up activities.
   h. Maintenance, restoration, modification, construction, or demolition of training features.

6. Natural Resource and Training Land Management, including:
   a. Stabilization or restoration of waterbody banks.
   b. Restoration of vegetation in previously disturbed areas.
   c. Excavation of soil or rock from borrow pits and quarries.
   d. Placement, operation, or removal of temporary scientific devices.
   e. Placement or removal of barriers intended for traffic management such as hedgehogs, Seibert stakes, or similar.
   f. Prescribed fire operations to include maintenance of firebreaks, emergency (active fire/hasty) fire breaks, construction/maintenance/repair of earthen/erosion control structures, fire suppression activities, or prescribed burns.
   g. Tree cutting, timber harvesting, fire fuels removal, or mowing with or without ground disturbance.
   h. Permitting for natural resources-related concerns such as stocking fish, or filling wetlands, or similar.
   i. Installation or removal of bat, bird, or rodent exclusionary measures in a manner that is reversible and causes minimal damage to the historic fabric of a building.
   j. Removal of pests or evidence of their inhabitation.
   k. Replacement of trees, shrubbery, or landscaping with historically similar (in type, height, and mass).
   l. Removal of sediment from water features, including rivers, creeks, lakes, ponds, or ditches.
   m. Contouring of ground for purposes of drainage or security.

n. Removal of landscaping that is diseased or that conflicts with Department of Defense Minimum Antiterrorism Standards.

7. Emergency and Remediation Activities, including:

a. Placement, maintenance, or removal of temporary, non-destructive site barriers to provide compliance with Department of Defense Minimum Antiterrorism Standards.

b. Responses to emergency releases of hazardous substance, pollutants, and contaminants that may involve removal of contaminated soils or treatment of buildings and structures.

c. Rescue and recovery of human life in instances of natural or man-made disasters.

d. Removal of contaminated soil by mechanical means.

e. Application of biosolids to land being remediated.

f. Minimally destructive testing of buildings and structures for hazard-containing materials, wherein any testing on historic fabric is performed in areas not readily visible.

g. Environmental restoration surveys within restoration operational units (OUs) as indicated on the map in Exhibit I or as designated by USAG Alaska's Restoration and Compliance personnel. *(for Restoration activities; non-Restoration see 1.m.)*

h. Destruction of ordnance or unexploded ordnance in existing open burning/open detonation units or in place.

i. Installation or removal/decommissioning of environmental monitoring units for the mitigation of hazardous materials.

j. Replacement, repair, or removal of tanks which contain or have been used for hazardous substances.

k. Activities necessary for the maintenance and operation of the landfill.

l. Exhumation and disposal of items landfilled or extracted from known or discovered buried debris areas on the installation.

m. Removal of hazardous waste from the installation.

Appendix E. Historic Buildings and Structures Inventory

The National Park Service conducted the first major building survey on Fort Wainwright in 1984. This survey was conducted as part of a regional study of World War II in the Pacific. The survey resulted in the designation of Ladd Field NHL (FAI-00236) in 1985. A re-evaluation was concluded in 2018, proposing an adjusted district boundary and removing one and adding five contributing resources (Table 5). Final acceptance of the re-evaluation is anticipated from the Keeper in late 2024.

The Ladd Air Force Base Cold War Historic District (FAI-01288) was determined eligible for inclusion on the National Register with concurrence with the Alaska SHPO in 2001. In 2010, the SHPO concurred on a district boundary revision and reduction in resources, with three buildings determined individually eligible for inclusion. One, Building, 1060, has since been determined not eligible.

Table 1. Contributing resources – Ladd Field National Historic Landmark (n=22)

	Building #	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) Bachelor Officer Quarters
5	1046	FAI-00502	Garage
6	1047	FAI-00453	Apartments-Officers (7 units)
7	1048	FAI-00446	Commander's Quarters
8	1049	FAI-00454	Apartments-NCO (12 units)
9	1051	FAI-00456	Apartments-NCO (14 units)
10	1533	FAI-00463	Warehouse (Butler Building)
11	1534	FAI-00464	Warehouse (Butler Building)
12	1537	FAI-00465	Warehouse (Butler Building)
13	1538	FAI-00533	Warehouse (Butler Building)
14	1540	FAI-00466	Warehouse (Butler Building)
15	1541	FAI-00503	Airways & Air Communications Services
16	1555	FAI-00467	Hospital/Barracks (250 bed)/Theater
17	1557	FAI-00469	Hangar No 1
18	1562	FAI-00472	Quartermaster
19	N/A	FAI-01244	North Runway
20	N/A	FAI-01245	South Runway
21	N/A	FAI-02677	Parade Ground
22	N/A	FAI-01242	Utilidors

Table 2. Contributing resources – Ladd Air Force Base Cold War Historic District (n=34)

	Building #	AHRS #	Name
1	1021	FAI-00448	Company Operations Annex
2	1024	FAI-00449	Radio Station (Red Cross office?)
3	1043	FAI-00451	North Post Chapel
4	1045	FAI-00452	(Murphy Hall) Bachelor Officer Quarters
5	1046	FAI-00502	Garage
6	1047	FAI-00453	Apartments-Officers (7 units)
7	1048	FAI-00446	Commander's Quarters
8	1049	FAI-00454	Apartments-NCO (12 units)
9	1051	FAI-00456	Apartments-NCO (14 units)
10	1533	FAI-00463	Warehouse
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-01327	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-01318	Fire Station
34	3203	FAI-00495	Ammunition Storage Igloo

Table 3. Individually eligible buildings (n=2)

	Building #	AHRS #	Name
1	4070	FAI-01283	Arctic Aeromedical Laboratory
2	4391	FAI-01789	Chena Elementary School

Appendix F. Archaeological Sites Inventory

Surveys have been conducted on lands managed by Forts Wainwright and Greely since the 1960s. In addition to the individual sites listed below, there are six archaeological districts eligible for the National Register.

Table 4. Archaeological Districts (n=6)

	AHRS #	Name-Location	Status	Historic/Prehistoric
1	FAI-00335	Blair Lakes-TFTA	Eligible	Historic/Prehistoric
2	FAI-00336	Clear Creek Buttes-TFTA	Eligible	Prehistoric
3	FAI-00337	Wood River Buttes-TFTA	Eligible	Prehistoric
4	XMH-00388	Donnelly Ridge-DTA E	Eligible	Prehistoric
5	XMH-01552	Heart among the Glaciers-DTA E	Eligible	Prehistoric
6	XMH-01553	Jarvis Creek-DTA E	Eligible	Prehistoric

Table 5. Archaeological Sites - Eligible or Not Yet Evaluated (n=606)

	AHRS #	Location	Status	Historic/Prehistoric
1	FAI-00040	Fort Wainwright	Eligible	Prehistoric
2	FAI-00044	TFTA	Eligible	Prehistoric
3	FAI-00046	TFTA	Eligible	Historic
4	FAI-00047	TFTA	Not evaluated	Prehistoric
5	FAI-00050	TFTA	Not evaluated	Prehistoric
6	FAI-00052	TFTA	Eligible	Prehistoric
7	FAI-00054	TFTA	Eligible	Historic
8	FAI-00056	TFTA	Eligible	Prehistoric
9	FAI-00059	TFTA	Not evaluated	Prehistoric
10	FAI-00060	TFTA	Not evaluated	Prehistoric
11	FAI-00086	TFTA	Not evaluated	Prehistoric
12	FAI-00087	TFTA	Eligible	Prehistoric
13	FAI-00088	TFTA	Not evaluated	Prehistoric
14	FAI-00161	TFTA	Not evaluated	Historic
15	FAI-00170	TFTA	Not evaluated	Prehistoric
16	FAI-00171	TFTA	Not evaluated	Prehistoric
17	FAI-00172	TFTA	Not evaluated	Prehistoric
18	FAI-00173	TFTA	Not evaluated	Prehistoric
19	FAI-00174	TFTA	Not evaluated	Prehistoric
20	FAI-00175	TFTA	Not evaluated	Prehistoric
21	FAI-00176	TFTA	Not evaluated	Prehistoric
22	FAI-00177	TFTA	Not evaluated	Prehistoric
23	FAI-00178	TFTA	Not evaluated	Prehistoric

24	FAI-00179	TFTA	Not evaluated	Prehistoric
25	FAI-00180	TFTA	Not evaluated	Prehistoric
26	FAI-00181	TFTA	Not evaluated	Prehistoric
27	FAI-00182	TFTA	Not evaluated	Prehistoric
28	FAI-00183	TFTA	Not evaluated	Prehistoric
29	FAI-00184	TFTA	Not evaluated	Prehistoric
30	FAI-00185	TFTA	Not evaluated	Prehistoric
31	FAI-00186	TFTA	Not evaluated	Prehistoric
32	FAI-00187	TFTA	Not evaluated	Prehistoric
33	FAI-00188	TFTA	Not evaluated	Prehistoric
34	FAI-00189	TFTA	Not evaluated	Prehistoric
35	FAI-00190	TFTA	Not evaluated	Prehistoric
36	FAI-00191	TFTA	Not evaluated	Prehistoric
37	FAI-00192	TFTA	Not evaluated	Prehistoric
38	FAI-00193	TFTA	Not evaluated	Prehistoric
39	FAI-00194	TFTA	Eligible	Prehistoric
40	FAI-00195	TFTA	Eligible	Prehistoric
41	FAI-00196	TFTA	Eligible	Prehistoric
42	FAI-00197	TFTA	Eligible	Prehistoric
43	FAI-00198	TFTA	Eligible	Prehistoric
44	FAI-01356	TFTA	Not evaluated	Prehistoric
45	FAI-01357	TFTA	Eligible	Prehistoric
46	FAI-01556	YTA	Not evaluated	Prehistoric
47	FAI-01885	TFTA	Not evaluated	Prehistoric
48	FAI-01886	TFTA	Not evaluated	Prehistoric
49	FAI-01887	TFTA	Not evaluated	Prehistoric
50	FAI-01888	TFTA	Not evaluated	Prehistoric
51	FAI-01889	TFTA	Eligible	Prehistoric
52	FAI-01998	TFTA	Not evaluated	Prehistoric
53	FAI-02001	TFTA	Not evaluated	Prehistoric
54	FAI-02002	TFTA	Not evaluated	Prehistoric
55	FAI-02003	TFTA	Not evaluated	Prehistoric
56	FAI-02004	TFTA	Not evaluated	Prehistoric
57	FAI-02005	TFTA	Not evaluated	Prehistoric
58	FAI-02006	TFTA	Not evaluated	Prehistoric
59	FAI-02007	TFTA	Not evaluated	Prehistoric
60	FAI-02008	TFTA	Not evaluated	Prehistoric
61	FAI-02009	TFTA	Not evaluated	Prehistoric
62	FAI-02010	TFTA	Not evaluated	Prehistoric

63	FAI-02011	TFTA	Not evaluated	Prehistoric
64	FAI-02012	TFTA	Not evaluated	Prehistoric
65	FAI-02013	TFTA	Not evaluated	Prehistoric
66	FAI-02014	TFTA	Not evaluated	Prehistoric
67	FAI-02016	TFTA	Not evaluated	Prehistoric
68	FAI-02018	TFTA	Not evaluated	Prehistoric
69	FAI-02019	TFTA	Not evaluated	Prehistoric
70	FAI-02020	TFTA	Not evaluated	Prehistoric
71	FAI-02021	TFTA	Not evaluated	Prehistoric
72	FAI-02022	TFTA	Not evaluated	Prehistoric
73	FAI-02023	TFTA	Not evaluated	Prehistoric
74	FAI-02024	TFTA	Not evaluated	Prehistoric
75	FAI-02025	TFTA	Not evaluated	Prehistoric
76	FAI-02026	TFTA	Not evaluated	Prehistoric
77	FAI-02027	TFTA	Not evaluated	Prehistoric
78	FAI-02028	TFTA	Not evaluated	Prehistoric
79	FAI-02029	TFTA	Not evaluated	Prehistoric
80	FAI-02030	TFTA	Not evaluated	Prehistoric
81	FAI-02031	TFTA	Not evaluated	Prehistoric
82	FAI-02032	TFTA	Not evaluated	Prehistoric
83	FAI-02033	TFTA	Not evaluated	Prehistoric
84	FAI-02043	TFTA	Eligible	Prehistoric
85	FAI-02044	TFTA	Not evaluated	Prehistoric
86	FAI-02047	TFTA	Eligible	Prehistoric
87	FAI-02049	TFTA	Not evaluated	Prehistoric
88	FAI-02050	TFTA	Not evaluated	Prehistoric
89	FAI-02051	TFTA	Not evaluated	Prehistoric
90	FAI-02052	TFTA	Not evaluated	Prehistoric
91	FAI-02056	TFTA	Not eligible, contributing	Prehistoric
92	FAI-02058	TFTA	Not eligible, contributing	Prehistoric
93	FAI-02059	TFTA	Not evaluated	Prehistoric
94	FAI-02060	TFTA	Eligible	Prehistoric
95	FAI-02061	TFTA	Not evaluated	Prehistoric
96	FAI-02063	TFTA	Eligible	Prehistoric
97	FAI-02064	TFTA	Not eligible, contributing	Prehistoric
98	FAI-02065	TFTA	Not evaluated	Prehistoric
99	FAI-02066	TFTA	Not evaluated	Prehistoric
100	FAI-02067	TFTA	Not evaluated	Prehistoric
101	FAI-02068	TFTA	Not evaluated	Prehistoric

102	FAI-02069	TFTA	Not evaluated	Prehistoric
103	FAI-02070	TFTA	Not evaluated	Prehistoric
104	FAI-02071	TFTA	Not evaluated	Prehistoric
105	FAI-02072	TFTA	Not evaluated	Prehistoric
106	FAI-02073	TFTA	Eligible	Prehistoric
107	FAI-02075	TFTA	Not evaluated	Prehistoric
108	FAI-02076	TFTA	Not evaluated	Prehistoric
109	FAI-02077	TFTA	Eligible	Prehistoric
110	FAI-02078	TFTA	Not evaluated	Prehistoric
111	FAI-02079	TFTA	Not evaluated	Prehistoric
112	FAI-02080	TFTA	Not evaluated	Prehistoric
113	FAI-02081	TFTA	Not evaluated	Prehistoric
114	FAI-02082	TFTA	Not evaluated	Prehistoric
115	FAI-02083	TFTA	Not evaluated	Prehistoric
116	FAI-02084	TFTA	Not evaluated	Prehistoric
117	FAI-02085	TFTA	Not evaluated	Prehistoric
118	FAI-02086	TFTA	Not evaluated	Prehistoric
119	FAI-02087	TFTA	Not evaluated	Prehistoric
120	FAI-02088	TFTA	Not evaluated	Prehistoric
121	FAI-02089	TFTA	Not evaluated	Prehistoric
122	FAI-02090	TFTA	Not evaluated	Prehistoric
123	FAI-02091	TFTA	Not evaluated	Prehistoric
124	FAI-02092	TFTA	Not evaluated	Prehistoric/Historic
125	FAI-02093	TFTA	Not evaluated	Prehistoric
126	FAI-02094	TFTA	Not evaluated	Prehistoric
127	FAI-02095	TFTA	Eligible	Prehistoric
128	FAI-02097	TFTA	Not evaluated	Prehistoric
129	FAI-02199	TFTA	Not eligible, contributing	Prehistoric
130	FAI-02200	TFTA	Not evaluated	Historic
131	FAI-02236	TFTA	Eligible	Prehistoric
132	FAI-02237	TFTA	Not evaluated	Prehistoric
133	FAI-02239	TFTA	Not evaluated	Prehistoric
134	FAI-02240	TFTA	Not evaluated	Prehistoric
135	FAI-02241	TFTA	Not evaluated	Prehistoric
136	FAI-02242	TFTA	Not evaluated	Prehistoric
137	FAI-02243	TFTA	Not evaluated	Prehistoric
138	FAI-02244	TFTA	Not evaluated	Prehistoric
139	FAI-02248	TFTA	Eligible	Prehistoric
140	FAI-02250	TFTA	Not evaluated	Prehistoric

141	FAI-02319	TFTA	Not evaluated	Prehistoric
142	FAI-02320	TFTA	Not evaluated	Prehistoric
143	FAI-02321	TFTA	Not eligible, contributing	Prehistoric
144	FAI-02322	TFTA	Not evaluated	Prehistoric
145	FAI-02323	TFTA	Not eligible, contributing	Prehistoric
146	FAI-02368	TFTA	Not evaluated	Historic
147	FAI-02392	TFTA	Not eligible, contributing	Prehistoric
148	FAI-02743	TFTA	Not evaluated	Prehistoric
149	FAI-02743	TFTA	Not evaluated	Prehistoric
150	FAI-02812	TFTA	Not evaluated	Prehistoric
151	HEA-00685	DTA West	Not evaluated	Prehistoric
152	TNX-00007	Tok Terminal	Eligible	Prehistoric
153	TNX-00010	Tok Terminal	Eligible	Prehistoric
154	TNX-00231	Tok Terminal	Not yet concurred	Prehistoric
155	TNX-00232	Tok Terminal	Not yet concurred	Prehistoric
156	TNX-00233	Tok Terminal	Not yet concurred	Prehistoric
157	TNX-00234	Tok Terminal	Not yet concurred	Prehistoric
158	TNX-00235	Tok Terminal	Not evaluated	Prehistoric
159	TNX-00236	Tok Terminal	Not evaluated	Prehistoric
160	TNX-00256	Tok Terminal	Not yet concurred	Prehistoric
161	XBD-00033	DTA West	Not evaluated	Prehistoric
162	XBD-00105	YTA	Not evaluated	Prehistoric
163	XBD-00106	DTA West	Eligible	Prehistoric
164	XBD-00108	DTA West	Not yet concurred	Prehistoric
165	XBD-00109	DTA West	Not evaluated	Prehistoric
166	XBD-00110	DTA West	Eligible	Prehistoric
167	XBD-00187	DTA West	Not evaluated	Prehistoric
168	XBD-00188	DTA West	Not evaluated	Prehistoric
169	XBD-00189	DTA West	Not evaluated	Prehistoric
170	XBD-00271/ XMH-01284	DTA East	Not evaluated	Prehistoric
171	XBD-00272	DTA East	Not evaluated	Prehistoric
172	XBD-00273	DTA East	Not evaluated	Prehistoric
173	XBD-00311	DTA West	Not evaluated	Prehistoric
174	XBD-00333/ XMH-01178	DTA East	Not evaluated	Prehistoric
175	XBD-00335	DTA West	Eligible	Prehistoric
176	XBD-00364	YTA	Not evaluated	Prehistoric
177	XBD-00368	YTA	Not yet concurred	Prehistoric
178	XBD-00370	YTA	Not yet concurred	Prehistoric
179	XBD-00425	DTA West	Not evaluated	Prehistoric

180	XBD-00426	DTA West	Not evaluated	Prehistoric
181	XBD-00427	DTA West	Not evaluated	Prehistoric
182	XBD-00428	DTA West	Not evaluated	Prehistoric
183	XBD-00429	DTA West	Not evaluated	Prehistoric
184	XBD-00430	DTA West	Not evaluated	Prehistoric
185	XBD-00431	DTA West	Not evaluated	Prehistoric
186	XBD-00450	DTA West	Not evaluated	Prehistoric
187	XBD-00451	DTA West	Not evaluated	Prehistoric
188	XBD-00452	YTA	Not yet concurred	Prehistoric
189	XBD-00454	DTA West	Not evaluated	Prehistoric
190	XBD-00454	DTA West	Not evaluated	Prehistoric
191	XBD-00457	DTA West	Not evaluated	Prehistoric
192	XBD-00457	DTA West	Not evaluated	Prehistoric
193	XBD-00457	DTA West	Not evaluated	Prehistoric
194	XBD-00458	DTA West	Not evaluated	Prehistoric
195	XBD-00458	DTA West	Not evaluated	Prehistoric
196	XMH-00001	DTA East	Not evaluated	Prehistoric
197	XMH-00005	DTA East	Eligible	Prehistoric
198	XMH-00006	DTA East	Eligible	Prehistoric
199	XMH-00007	DTA East	Eligible	Prehistoric
200	XMH-00008	DTA East	Eligible	Prehistoric
201	XMH-00009	DTA East	Eligible	Prehistoric
202	XMH-00010	DTA East	Eligible	Prehistoric
203	XMH-00011	DTA East	Eligible	Prehistoric
204	XMH-00012	DTA East	Not evaluated	Prehistoric
205	XMH-00016/ XMH-00970	DTA East	Not evaluated	Prehistoric
206	XMH-00019	DTA East	Eligible	Prehistoric
207	XMH-00020	DTA East	Eligible	Prehistoric
208	XMH-00023	DTA East	Not evaluated	Prehistoric
209	XMH-00226	DTA West	Not evaluated	Historic
210	XMH-00232	DTA West	Not evaluated	Prehistoric
211	XMH-00233	DTA West	Not evaluated	Prehistoric
212	XMH-00234	DTA West	Not evaluated	Prehistoric
213	XMH-00235	DTA West	Not evaluated	Prehistoric
214	XMH-00236	DTA West	Not evaluated	Prehistoric
215	XMH-00237	DTA West	Not evaluated	Prehistoric
216	XMH-00238	DTA West	Not evaluated	Prehistoric
217	XMH-00265	DTA East	Eligible	Prehistoric
218	XMH-00266	DTA East	Eligible	Prehistoric

219	XMH-00267	DTA East	Not evaluated	Prehistoric
220	XMH-00268	DTA East	Not evaluated	Prehistoric
221	XMH-00269	DTA East	Not evaluated	Prehistoric
222	XMH-00270	DTA East	Not evaluated	Prehistoric
223	XMH-00272	DTA East	Not evaluated	Prehistoric
224	XMH-00274	DTA East	Not evaluated	Prehistoric
225	XMH-00277/ XMH-00879	DTA East	Eligible	Prehistoric
226	XMH-00278	DTA East	Not evaluated	Prehistoric
227	XMH-00279/ XMH-00918	DTA East	Eligible	Prehistoric
228	XMH-00281/ XMH-00972	DTA East	Not evaluated	Prehistoric
229	XMH-00282/ XMH-01171	DTA East	Eligible	Prehistoric
230	XMH-00283	DTA East	Not yet concurred	Prehistoric
231	XMH-00284/ XMH-00882	DTA East	Eligible	Prehistoric
232	XMH-00285	DTA East	Not yet concurred	Prehistoric
233	XMH-00286	DTA East	Not evaluated	Prehistoric
234	XMH-00292/ XMH-00885	DTA East	Eligible	Prehistoric
235	XMH-00294	DTA East	Eligible	Prehistoric
236	XMH-00295	DTA East	Eligible	Prehistoric
237	XMH-00296	DTA East	Not evaluated	Prehistoric
238	XMH-00297	DTA East	Eligible	Prehistoric
239	XMH-00298	DTA West	Not evaluated	Prehistoric
240	XMH-00299	DTA West	Not evaluated	Prehistoric
241	XMH-00300	DTA West	Not evaluated	Prehistoric
242	XMH-00301	DTA West	Not evaluated	Prehistoric
243	XMH-00302	DTA West	Not evaluated	Prehistoric
244	XMH-00303	DTA West	Not evaluated	Prehistoric
245	XMH-00304	DTA West	Not evaluated	Prehistoric
246	XMH-00305	DTA West	Not evaluated	Prehistoric
247	XMH-00306	DTA West	Not evaluated	Prehistoric
248	XMH-00307	DTA West	Not evaluated	Prehistoric
249	XMH-00309	DTA West	Not evaluated	Prehistoric
250	XMH-00310	DTA West	Not evaluated	Prehistoric
251	XMH-00311	DTA West	Not evaluated	Prehistoric
252	XMH-00313	DTA West	Not evaluated	Prehistoric
253	XMH-00314	DTA West	Not evaluated	Prehistoric
254	XMH-00323/ XMH-00893	DTA East	Not evaluated	Prehistoric
255	XMH-00829	DTA West	Not evaluated	Prehistoric

256	XMH-00830	DTA West	Not evaluated	Prehistoric
257	XMH-00831	DTA West	Not evaluated	Prehistoric
258	XMH-00832	DTA West	Not evaluated	Prehistoric
259	XMH-00833	DTA West	Not evaluated	Prehistoric
260	XMH-00834	DTA West	Not evaluated	Prehistoric
261	XMH-00835	DTA West	Not evaluated	Prehistoric
262	XMH-00836	DTA West	Not evaluated	Prehistoric
263	XMH-00837	DTA West	Not evaluated	Prehistoric
264	XMH-00838	DTA East	Eligible	Prehistoric
265	XMH-00839	DTA West	Not yet concurred	Prehistoric
266	XMH-00840	DTA West	Not evaluated	Prehistoric
267	XMH-00841	DTA West	Not evaluated	Prehistoric
268	XMH-00843	DTA East	Not evaluated	Prehistoric
269	XMH-00874	DTA East	Eligible	Prehistoric
270	XMH-00878/ XMH-00908	DTA East	Eligible	Prehistoric
271	XMH-00881	DTA East	Eligible	Prehistoric
272	XMH-00887	DTA East	Eligible	Prehistoric
273	XMH-00890	DTA East	Eligible	Prehistoric
274	XMH-00891	DTA East	Eligible	Prehistoric
275	XMH-00894	DTA East	Not evaluated	Prehistoric
276	XMH-00895	DTA East	Eligible	Prehistoric
277	XMH-00896	DTA East	Not evaluated	Prehistoric
278	XMH-00897	DTA East	Not yet concurred	Prehistoric
279	XMH-00899	DTA East	Not yet concurred	Prehistoric
280	XMH-00900	DTA East	Not evaluated	Prehistoric
281	XMH-00901	DTA East	Not yet concurred	Prehistoric
282	XMH-00902	DTA East	Not yet concurred	Prehistoric
283	XMH-00903	DTA East	Not yet concurred	Prehistoric
284	XMH-00904	DTA East	Eligible	Prehistoric
285	XMH-00905	DTA East	Not evaluated	Prehistoric
286	XMH-00906	DTA East	Not evaluated	Prehistoric
287	XMH-00907	DTA East	Not evaluated	Prehistoric
288	XMH-00909	DTA East	Not evaluated	Prehistoric
289	XMH-00910/ XMH-00911	DTA East	Not evaluated	Prehistoric
290	XMH-00913	DTA East	Not evaluated	Prehistoric
291	XMH-00914	DTA East	Not evaluated	Prehistoric
292	XMH-00915	DTA East	Not evaluated	Prehistoric
293	XMH-00917	DTA East	Not evaluated	Prehistoric
294	XMH-00919	DTA East	Eligible	Prehistoric

295	XMH-00920	DTA East	Eligible	Prehistoric
296	XMH-00921	DTA East	Not evaluated	Prehistoric
297	XMH-00923/ XMH-00922	DTA East	Not evaluated	Prehistoric
298	XMH-00924	DTA East	Not evaluated	Prehistoric
299	XMH-00925	DTA East	Not evaluated	Prehistoric
300	XMH-00926	DTA East	Not evaluated	Prehistoric
301	XMH-00927	DTA East	Not evaluated	Prehistoric
302	XMH-00928	DTA East	Not evaluated	Prehistoric
303	XMH-00929	DTA East	Not evaluated	Prehistoric
304	XMH-00930	DTA East	Eligible	Prehistoric
305	XMH-00931	DTA East	Eligible	Prehistoric
306	XMH-00932	DTA East	Not evaluated	Prehistoric
307	XMH-00933	DTA East	Eligible	Prehistoric
308	XMH-00934	DTA East	Not evaluated	Prehistoric
309	XMH-00939	DTA East	Not yet concurred	Prehistoric
310	XMH-00940	DTA East	Not yet concurred	Prehistoric
311	XMH-00941	DTA East	Not yet concurred	Prehistoric
312	XMH-00942	DTA East	Not evaluated	Prehistoric
313	XMH-00944	DTA East	Not evaluated	Prehistoric
314	XMH-00945	DTA East	Eligible	Prehistoric
315	XMH-00947	DTA East	Not evaluated	Prehistoric
316	XMH-00948	DTA East	Not yet concurred	Prehistoric
317	XMH-00949	DTA East	Not evaluated	Prehistoric
318	XMH-00950	DTA East	Not evaluated	Prehistoric
319	XMH-00951	DTA East	Not evaluated	Prehistoric
320	XMH-00953	DTA East	Eligible	Prehistoric
321	XMH-00955	DTA East	Not evaluated	Prehistoric
322	XMH-00956	DTA East	Not yet concurred	Prehistoric
323	XMH-00957	DTA East	Not evaluated	Prehistoric
324	XMH-00958	DTA East	Not evaluated	Prehistoric
325	XMH-00959	DTA East	Not evaluated	Prehistoric
326	XMH-00960	DTA East	Not evaluated	Prehistoric
327	XMH-00961	DTA East	Not evaluated	Prehistoric
328	XMH-00962	DTA East	Not evaluated	Prehistoric
329	XMH-00963	DTA East	Not evaluated	Prehistoric
330	XMH-00964	DTA East	Not evaluated	Prehistoric
331	XMH-00966	DTA East	Not evaluated	Prehistoric
332	XMH-00967	DTA East	Not evaluated	Prehistoric
333	XMH-00968	DTA East	Not evaluated	Prehistoric

334	XMH-00969	DTA East	Not evaluated	Prehistoric
335	XMH-00971	DTA East	Not evaluated	Prehistoric
336	XMH-00973	DTA East	Not evaluated	Prehistoric
337	XMH-00975	DTA East	Not evaluated	Prehistoric
338	XMH-00976	DTA East	Not evaluated	Prehistoric
339	XMH-00977	DTA East	Not evaluated	Prehistoric
340	XMH-00978	DTA East	Not evaluated	Prehistoric
341	XMH-00979	DTA East	Not evaluated	Prehistoric
342	XMH-00980	DTA East	Not yet concurred	Prehistoric
343	XMH-00992	DTA East	Not yet concurred	Prehistoric
344	XMH-00993	DTA East	Not yet concurred	Prehistoric
345	XMH-00994	DTA East	Not yet concurred	Prehistoric
346	XMH-00995	DTA East	Not yet concurred	Prehistoric
347	XMH-00996	DTA East	Not yet concurred	Prehistoric
348	XMH-00997	DTA East	Not yet concurred	Prehistoric
349	XMH-00998	DTA East	Not yet concurred	Prehistoric
350	XMH-00999	DTA East	Not yet concurred	Prehistoric
351	XMH-01051	DTA East	Not yet concurred	Prehistoric
352	XMH-01052	DTA East	Not evaluated	Prehistoric
353	XMH-01053	DTA East	Not evaluated	Prehistoric
354	XMH-01054	DTA East	Not evaluated	Prehistoric
355	XMH-01055	DTA East	Not evaluated	Prehistoric
356	XMH-01056	DTA East	Not evaluated	Prehistoric
357	XMH-01057	DTA East	Not evaluated	Prehistoric
358	XMH-01058	DTA East	Not evaluated	Prehistoric
359	XMH-01061	DTA East	Eligible	Prehistoric
360	XMH-01062/ XMH-01063	DTA East	Not yet concurred	Prehistoric
361	XMH-01067	DTA East	Not yet concurred	Prehistoric
362	XMH-01068	DTA East	Not yet concurred	Prehistoric
363	XMH-01069	DTA East	Not yet concurred	Prehistoric
364	XMH-01070	DTA East	Not yet concurred	Prehistoric
365	XMH-01071	DTA East	Not evaluated	Prehistoric
366	XMH-01074	DTA East	Not evaluated	Prehistoric
367	XMH-01075	DTA East	Not evaluated	Prehistoric
368	XMH-01076	DTA East	Not evaluated	Prehistoric
369	XMH-01077	DTA East	Not evaluated	Prehistoric
370	XMH-01078	DTA East	Not evaluated	Prehistoric
371	XMH-01084	DTA East	Not evaluated	Prehistoric
372	XMH-01085	DTA East	Not evaluated	Prehistoric

373	XMH-01086	DTA East	Not evaluated	Prehistoric
374	XMH-01087	DTA East	Not evaluated	Prehistoric
375	XMH-01088	DTA East	Not evaluated	Prehistoric
376	XMH-01089	DTA East	Not evaluated	Prehistoric
377	XMH-01090	DTA East	Not evaluated	Prehistoric
378	XMH-01091	DTA East	Not evaluated	Prehistoric
379	XMH-01092	DTA East	Eligible	Prehistoric
380	XMH-01093	DTA East	Eligible	Prehistoric
381	XMH-01095/ XMH-01142	DTA East	Not evaluated	Prehistoric
382	XMH-01096	DTA East	Not yet concurred	Prehistoric
383	XMH-01097	DTA East	Not evaluated	Prehistoric
384	XMH-01098	DTA East	Not evaluated	Prehistoric
385	XMH-01099	DTA East	Not evaluated	Prehistoric
386	XMH-01100	DTA East	Not evaluated	Prehistoric
387	XMH-01104	DTA East	Not evaluated	Prehistoric
388	XMH-01105	DTA East	Not evaluated	Prehistoric
389	XMH-01106	DTA East	Not evaluated	Prehistoric
390	XMH-01107	DTA East	Eligible	Prehistoric
391	XMH-01108	DTA East	Not evaluated	Prehistoric
392	XMH-01109	DTA East	Eligible	Prehistoric
393	XMH-01110	DTA East	Eligible	Prehistoric
394	XMH-01111	DTA East	Not evaluated	Prehistoric
395	XMH-01114	DTA East	Not evaluated	Prehistoric
396	XMH-01115/ XMH-01117	DTA East	Eligible	Prehistoric
397	XMH-01116	DTA East	Eligible	Prehistoric
398	XMH-01118	DTA East	Not evaluated	Prehistoric
399	XMH-01119	DTA East	Not evaluated	Prehistoric
400	XMH-01120	DTA East	Not evaluated	Prehistoric
401	XMH-01121	DTA East	Not evaluated	Prehistoric
402	XMH-01122	DTA East	Not evaluated	Prehistoric
403	XMH-01123	DTA East	Not evaluated	Prehistoric
404	XMH-01124	DTA East	Not evaluated	Prehistoric
405	XMH-01125	DTA East	Not evaluated	Prehistoric
406	XMH-01126	DTA East	Not evaluated	Prehistoric
407	XMH-01128	DTA East	Not evaluated	Prehistoric
408	XMH-01129	DTA East	Not evaluated	Prehistoric
409	XMH-01130	DTA East	Not yet concurred	Prehistoric
410	XMH-01131	DTA East	Not evaluated	Prehistoric
411	XMH-01133	DTA East	Not evaluated	Prehistoric

412	XMH-01134	DTA East	Not evaluated	Prehistoric
413	XMH-01135	DTA East	Not evaluated	Prehistoric
414	XMH-01136	DTA East	Not evaluated	Prehistoric
415	XMH-01137	DTA East	Not evaluated	Prehistoric
416	XMH-01138	DTA East	Not evaluated	Prehistoric
417	XMH-01139	DTA East	Not evaluated	Prehistoric
418	XMH-01140	DTA East	Not evaluated	Prehistoric
419	XMH-01141	DTA East	Not evaluated	Prehistoric
420	XMH-01143	DTA East	Not evaluated	Prehistoric
421	XMH-01144	DTA East	Not evaluated	Prehistoric
422	XMH-01145	DTA East	Eligible	Prehistoric
423	XMH-01146	DTA East	Eligible	Prehistoric
424	XMH-01147	DTA East	Not evaluated	Prehistoric
425	XMH-01148	DTA East	Not evaluated	Prehistoric
426	XMH-01149	DTA East	Not evaluated	Prehistoric
427	XMH-01150	DTA East	Not evaluated	Prehistoric
428	XMH-01151	DTA East	Not evaluated	Prehistoric
429	XMH-01152	DTA East	Not evaluated	Prehistoric
430	XMH-01153	DTA East	Not evaluated	Prehistoric
431	XMH-01154	DTA East	Not evaluated	Prehistoric
432	XMH-01155	DTA East	Not evaluated	Prehistoric
433	XMH-01156	DTA East	Not evaluated	Prehistoric
434	XMH-01157	DTA East	Not evaluated	Prehistoric
435	XMH-01158	DTA East	Not evaluated	Prehistoric
436	XMH-01159	DTA East	Not evaluated	Prehistoric
437	XMH-01162	DTA East	Not evaluated	Prehistoric
438	XMH-01163	DTA East	Not evaluated	Prehistoric
439	XMH-01169	DTA East	Not evaluated	Prehistoric
440	XMH-01170	DTA East	Not evaluated	Prehistoric
441	XMH-01175	DTA East	Not evaluated	Prehistoric
442	XMH-01176	DTA East	Not evaluated	Prehistoric
443	XMH-01194	DTA East	Not evaluated	Prehistoric
444	XMH-01195	DTA East	Not evaluated	Prehistoric
445	XMH-01196	DTA East	Not evaluated	Prehistoric
446	XMH-01197	DTA East	Not yet concurred	Prehistoric
447	XMH-01198	DTA East	Not evaluated	Prehistoric
448	XMH-01199	DTA East	Not yet concurred	Prehistoric
449	XMH-01200	DTA East	Not evaluated	Prehistoric
450	XMH-01201	DTA East	Not yet concurred	Prehistoric

451	XMH-01202	DTA East	Not evaluated	Prehistoric
452	XMH-01203	DTA East	Not evaluated	Prehistoric
453	XMH-01204	DTA East	Not evaluated	Prehistoric
454	XMH-01206	DTA East	Not evaluated	Prehistoric
455	XMH-01207	DTA East	Not evaluated	Prehistoric
456	XMH-01208	DTA East	Not evaluated	Prehistoric
457	XMH-01209	DTA East	Not evaluated	Prehistoric
458	XMH-01210	DTA East	Not evaluated	Prehistoric
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461	XMH-01214	DTA East	Not evaluated	Prehistoric
462	XMH-01215	DTA East	Not evaluated	Prehistoric
463	XMH-01216	DTA East	Not yet concurred	Prehistoric
464	XMH-01217	DTA East	Not evaluated	Prehistoric
465	XMH-01218	DTA East	Not evaluated	Prehistoric
466	XMH-01219	DTA East	Not yet concurred	Prehistoric
467	XMH-01220	DTA East	Not evaluated	Prehistoric
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470	XMH-01237	DTA East	Not yet concurred	Prehistoric
471	XMH-01278	DTA East	Not evaluated	Prehistoric
472	XMH-01279	DTA East	Not yet concurred	Prehistoric
473	XMH-01280	DTA East	Not yet concurred	Prehistoric
474	XMH-01281	DTA East	Not yet concurred	Prehistoric
475	XMH-01282	DTA East	Not yet concurred	Prehistoric
476	XMH-01283	DTA East	Not evaluated	Prehistoric
477	XMH-01285	DTA East	Not evaluated	Prehistoric
478	XMH-01286	DTA East	Not evaluated	Prehistoric
479	XMH-01287	DTA East	Not evaluated	Prehistoric
480	XMH-01288	DTA East	Not evaluated	Prehistoric
481	XMH-01289	DTA East	Not yet concurred	Prehistoric
482	XMH-01290	DTA East	Not evaluated	Prehistoric
483	XMH-01291	DTA East	Not evaluated	Prehistoric
484	XMH-01292	DTA East	Not evaluated	Prehistoric
485	XMH-01293	DTA East	Not yet concurred	Prehistoric
486	XMH-01294	DTA East	Not yet concurred	Prehistoric
487	XMH-01295	DTA East	Not yet concurred	Prehistoric
488	XMH-01296	DTA East	Not evaluated	Prehistoric
489	XMH-01297	DTA East	Not evaluated	Prehistoric

490	XMH-01298	DTA East	Not evaluated	Prehistoric
491	XMH-01299	DTA East	Not yet concurred	Prehistoric
492	XMH-01300	DTA East	Not yet concurred	Prehistoric
493	XMH-01301	DTA East	Not yet concurred	Prehistoric
494	XMH-01302	DTA East	Not yet concurred	Prehistoric
495	XMH-01303	DTA East	Eligible	Prehistoric
496	XMH-01332	DTA East	Not yet concurred	Prehistoric
497	XMH-01333	DTA East	Not yet concurred	Prehistoric
498	XMH-01334	DTA East	Not evaluated	Prehistoric
499	XMH-01335	DTA East	Not evaluated	Prehistoric
500	XMH-01336	DTA East	Not evaluated	Prehistoric
501	XMH-01356	DTA East	Eligible	Prehistoric
502	XMH-01357	DTA East	Eligible	Prehistoric
503	XMH-01358	DTA East	Not yet concurred	Prehistoric
504	XMH-01359	GRTA	Not yet concurred	Prehistoric
505	XMH-01360	DTA East	Not evaluated	Prehistoric
506	XMH-01361	DTA East	Not evaluated	Prehistoric
507	XMH-01362	DTA East	Not evaluated	Prehistoric
508	XMH-01363	DTA East	Not evaluated	Prehistoric
509	XMH-01364	DTA East	Not evaluated	Prehistoric
510	XMH-01365	DTA East	Not evaluated	Prehistoric
511	XMH-01366	DTA East	Not evaluated	Prehistoric
512	XMH-01367	DTA East	Not evaluated	Prehistoric
513	XMH-01368	DTA East	Not evaluated	Prehistoric
514	XMH-01369	DTA East	Not evaluated	Prehistoric
515	XMH-01370	DTA East	Not evaluated	Prehistoric
516	XMH-01371	DTA East	Not evaluated	Prehistoric
517	XMH-01372	DTA East	Not evaluated	Prehistoric
518	XMH-01373	DTA East	Not yet concurred	Prehistoric
519	XMH-01374	DTA East	Not evaluated	Prehistoric
520	XMH-01375	DTA East	Not evaluated	Prehistoric
521	XMH-01376	DTA East	Not evaluated	Prehistoric
522	XMH-01377	DTA East	Not evaluated	Prehistoric
523	XMH-01378	DTA East	Not yet concurred	Prehistoric
524	XMH-01379	DTA East	Not evaluated	Prehistoric
525	XMH-01380	DTA East	Not yet concurred	Prehistoric
526	XMH-01381	DTA East	Not yet concurred	Prehistoric
527	XMH-01382	DTA East	Not evaluated	Prehistoric
528	XMH-01383	DTA East	Not evaluated	Prehistoric

529	XMH-01384	DTA East	Not evaluated	Prehistoric
530	XMH-01414	DTA West	Eligible	Prehistoric
531	XMH-01434	DTA West	Not evaluated	Prehistoric
532	XMH-01435	DTA West	Not evaluated	Prehistoric
533	XMH-01436	DTA West	Not evaluated	Prehistoric
534	XMH-01437	DTA West	Not evaluated	Prehistoric
535	XMH-01438	DTA West	Not evaluated	Prehistoric
536	XMH-01439	DTA West	Not evaluated	Prehistoric
537	XMH-01440	DTA West	Not evaluated	Prehistoric
538	XMH-01441	DTA West	Eligible	Prehistoric
539	XMH-01442	DTA West	Not evaluated	Prehistoric
540	XMH-01443	DTA West	Not evaluated	Prehistoric
541	XMH-01445	DTA West	Not evaluated	Prehistoric
542	XMH-01446	DTA West	Not evaluated	Prehistoric
543	XMH-01447	DTA West	Not evaluated	Prehistoric
544	XMH-01449	DTA West	Not evaluated	Prehistoric
545	XMH-01450	DTA West	Eligible	Prehistoric
546	XMH-01451	DTA West	Not evaluated	Prehistoric
547	XMH-01452	DTA West	Not evaluated	Prehistoric
548	XMH-01453	DTA West	Not evaluated	Prehistoric
549	XMH-01454	DTA West	Not evaluated	Prehistoric
550	XMH-01455	DTA East	Not evaluated	Prehistoric
551	XMH-01456	DTA East	Not evaluated	Prehistoric
552	XMH-01458	DTA East	Not evaluated	Prehistoric
553	XMH-01459	DTA East	Not yet concurred	Prehistoric
554	XMH-01460	DTA East	Not evaluated	Prehistoric
555	XMH-01491	DTA West	Not evaluated	Prehistoric
556	XMH-01493	DTA East	Not evaluated	Prehistoric
557	XMH-01503	BRTA	Not yet concurred	Prehistoric
558	XMH-01504	BRTA	Not evaluated	Prehistoric
559	XMH-01505	BRTA	Not yet concurred	Prehistoric
560	XMH-01506	BRTA	Not yet concurred	Prehistoric
561	XMH-01507	BRTA	Not yet concurred	Prehistoric
562	XMH-01508	BRTA	Not yet concurred	Prehistoric
563	XMH-01509	GRTA	Not yet concurred	Prehistoric
564	XMH-01511	DTA East	Not evaluated	Prehistoric
565	XMH-01512	DTA East	Not evaluated	Prehistoric
566	XMH-01524	DTA East	Not evaluated	Prehistoric
567	XMH-01525	DTA East	Not yet concurred	Prehistoric

568	XMH-01526	DTA East	Not evaluated	Prehistoric
569	XMH-01527	DTA East	Not yet concurred	Prehistoric
570	XMH-01532	DTA East	Not evaluated	Prehistoric
571	XMH-01533	DTA East	Not evaluated	Prehistoric
572	XMH-01535	DTA East	Not evaluated	Prehistoric
573	XMH-01536	DTA East	Not evaluated	Prehistoric
574	XMH-01537	DTA East	Not evaluated	Prehistoric
575	XMH-01538	WCTA	Not yet concurred	Prehistoric
576	XMH-01539	DTA East	Not yet concurred	Historic
577	XMH-01544	DTA West	Not evaluated	Prehistoric
578	XMH-01545	DTA West	Not evaluated	Prehistoric
579	XMH-01546	DTA East	Not evaluated	Prehistoric
580	XMH-01547	DTA East	Not evaluated	Prehistoric
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587	XMH-01567	DTA East	Not yet concurred	Prehistoric
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591	XMH-01596	DTA East	Not evaluated	Prehistoric
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593	XMH-01598	DTA East	Not evaluated	Prehistoric
594	XMH-01599	DTA East	Not evaluated	Prehistoric
595	XMH-01600	DTA East	Not evaluated	Prehistoric
596	XMH-01601	BRTA	Not evaluated	Prehistoric
597	XMH-01602	DTA East	Not evaluated	Prehistoric
598	XMH-01603	DTA East	Not evaluated	Prehistoric
599	XMH-01604	DTA East	Not evaluated	Prehistoric
600	XMH-01605	GRTA	Not yet concurred	Prehistoric
601	XMH-01606	WCTA	Not evaluated	Prehistoric
602	XMH-01607	DTA East	Not yet concurred	Prehistoric
603	XMH-01608	DTA East	Not evaluated	Prehistoric
604	XMH-01609	DTA East	Not evaluated	Prehistoric
605	XMH-01616	DTA East	Not yet concurred	Prehistoric
606	XMH-01617	GRTA	Not evaluated	Prehistoric

Table 6. Archaeological Sites: Eligible or Not Yet Evaluated – USAG Greely (n=7)

	AHRS #	Location	Status	Historic/Prehistoric
1	XMH-00280	Fort Greely	Eligible	Prehistoric
2	XMH-01168	Fort Greely	Eligible	Prehistoric
3	XMH-01224	Fort Greely	Eligible	Prehistoric
4	XMH-01225	Fort Greely	Eligible	Prehistoric
5	XMH-01226	Fort Greely	Eligible	Prehistoric
6	XMH-01227	Fort Greely	Eligible	Prehistoric
7	XMH-02871	Fort Greely	Eligible	Prehistoric

DOEs NOTED "*NOT YET CONCURRED"* = FIELDWORK HAS BEEN COMPLETED. REPORTS HAVE BEEN SUBMITTED AND AWAIT CONCURRENCE OR ARE BEING PREPARED FOR SUBMISSION.

Appendix G. Five-Year Plans for Site Monitoring, Survey, and Evaluation

Five-Year Site Monitoring Plan

Table 7. Five-year site monitoring plan

YEAR 1		YEAR 2		YEAR 3		YEAR 4		YEAR 5
DTA E	DTA E	DTA E	TFTA	DTA W	DTA E	DTA E	TFTA	DTA W
XBD-00272	XMH-01146	XBD-00333/ XMH-01178/ XBD-00270	FAI-00059	XBD-00110	XMH-01282	XMH-00005	FAI-00044	XBD-00330
XBD-00273	XMH-01147	XMH-00009	FAI-00060	XBD-00335	XMH-01289	XMH-00282/ 01171	FAI-00046	XMH-00226
XMH-00001	XMH-01153	XMH-00010	FAI-00176	XBD-00457	XMH-01294	XMH-00887	FAI-00047	XMH-01435
XMH-00006	XMH-01154	XMH-00294	FAI-00177	XMH-00839	XMH-01295	XMH-00890	FAI-00052	XMH-01436
XMH-00007	XMH-01155	XMH-00295	FAI-00178	**BRTA**	XMH-01299	XMH-00977	FAI-00087	XMH-01440
XMH-00008	XMH-01156	XMH-00323/ 00893	FAI-00179	XMH-01504	XMH-01362	XMH-01062/ 01063	FAI-01998	XMH-01441
XMH-00011	XMH-01157	XMH-00896	FAI-00180	XMH-01505	XMH-01363	XMH-01071	FAI-02001	XMH-01442
XMH-00012	XMH-01158	XMH-00897	FAI-00181	XMH-01506	XMH-01373	XMH-01089	FAI-02002	XMH-01443
XMH-00019	XMH-01159	XMH-00899	FAI-00182	XMH-01508	XMH-01374	XMH-01108	FAI-02003	XMH-01449
XMH-00020	XMH-01162	XMH-00901	FAI-00189	XMH-01601	XMH-01375	XMH-01141	FAI-02004	**TFTA**
XMH-00265	XMH-01195	XMH-00902	FAI-00192	**DTA E**	XMH-01376	XMH-01163	FAI-02005	FAI-00050
XMH-00266	XMH-01198	XMH-00903	FAI-00193	XMH-00894	XMH-01378	XMH-01237	FAI-02006	FAI-00054
XMH-00267	XMH-01200	XMH-00931	FAI-00194	XMH-00904	XMH-01379	XMH-01377	FAI-02008	FAI-00056
XMH-00277/ 00879	XMH-01202	XMH-00980	FAI-00195	XMH-00905	XMH-01380	XMH-01567	FAI-02009	FAI-00086
XMH-00278	XMH-01203	XMH-00992	FAI-00196	XMH-00909	XMH-01381	XMH-00953	FAI-02010	FAI-00088
XMH-00279/ 00918	XMH-01206	XMH-00993 /994/997/ 998	FAI-00197	XMH-00919	XMH-01382	**DTA W**	FAI-02011	FAI-02016
XMH-00297	XMH-01207	XMH-00995	FAI-00198	XMH-00920	XMH-01383	HEA-00685	FAI-02012	FAI-02018
XMH-00838	XMH-01208	XMH-00996	FAI-02007	XMH-00929	XMH-01493	XBD-00033	FAI-02013	FAI-02019
XMH-00843	XMH-01209	XMH-00999	FAI-02020	XMH-01070	XMH-01512	XBD-00106	FAI-02014	FAI-02044
XMH-00878/ 00908	XMH-01210	XMH-01051	FAI-02032	XMH-01074	XMH-01535	XBD-00108	FAI-02021	FAI-02052
XMH-00891	XMH-01211	XMH-01169	FAI-02033	XMH-01075	XMH-01593	XBD-00187	FAI-02022	FAI-02059
XMH-00895	XMH-01213	XMH-01170	FAI-02043	XMH-01076	XMH-01594	XBD-00311	FAI-02023	FAI-02060
XMH-00900	XMH-01214	XMH-01196	FAI-02058	XMH-01077	XMH-01595	XBD-00425	FAI-02024	FAI-02064
XMH-00906	XMH-01215	XMH-01221	FAI-02063	XMH-01085	XMH-01596	XBD-00426	FAI-02025	FAI-02056
XMH-00907	XMH-01217	XMH-01222	FAI-02082	XMH-01086	XMH-01597	XBD-00427	FAI-02026	FAI-02199
XMH-00910/ 00911	XMH-01218	XMH-01280	FAI-02085	XMH-01093	XMH-01598	XBD-00428	FAI-02027	FAI-02237
XMH-00913	XMH-01219	XMH-01293	FAI-02092	XMH-01095/ 01142	XMH-01600	XBD-00429	FAI-02028	FAI-02239

XMH-00914	XMH-01220	XMH-01300	FAI-02093	XMH-01096	XMH-01602	XBD-00430	FAI-02029	FAI-02240
XMH-00915	XMH-01283	XMH-01332	FAI-02095	XMH-01097	XMH-01603	XBD-00431	FAI-02030	FAI-02242
XMH-00917	XMH-01285	XMH-01333	FAI-02097	XMH-01098	XMH-01604	XBD-00458	FAI-02031	FAI-02243
XMH-00921	XMH-01286	XMH-01358	FAI-02241	XMH-01099	XMH-01608	XMH-00299	FAI-02047	FAI-02245
XMH-00924	XMH-01287	XMH-01360	FAI-02743	XMH-01100	XMH-01609	XMH-00300	FAI-02049	FAI-02248
XMH-00925	XMH-01288	XMH-01369	**FGA**	XMH-01104		XMH-00303	FAI-02050	FAI-02250
XMH-00926	XMH-01290	XMH-01370	XMH-00280	XMH-01105	**WCTA**	XMH-00304	FAI-02051	FAI-02319
XMH-00927	XMH-01291	XMH-01371	XMH-00871	XMH-01106	XMH-01538	XMH-00305	FAI-02054	FAI-02320
XMH-00928	XMH-01292	XMH-01524	XMH-01168	XMH-01107	XMH-01606	XMH-00306	FAI-02055	FAI-02322
XMH-00930	XMH-01296	XMH-01525	XMH-01224	XMH-01109	**TFTA**	XMH-00307	FAI-02061	FAI-02321
XMH-00932	XMH-01297	XMH-01527	XMH-01225	XMH-01110	FAI-00170	XMH-00310	FAI-02065	**Tok**
XMH-00933	XMH-01298	XMH-01584	XMH-01226	XMH-01111	FAI-00171	XMH-00311	FAI-02066	TNX-00007/ 00023
XMH-00934	XMH-01303	XMH-01369	XMH-01227	XMH-01114	FAI-00172	XMH-00313	FAI-02067	TNX-00008
XMH-00939	XMH-01334	XMH-01370	**GRTA**	XMH-01115/ 01117	FAI-00173	XMH-00829	FAI-02068	TNX-00010
XMH-00940	XMH-01335	XMH-01371	XMH-01359	XMH-01116	FAI-00174	XMH-00830	FAI-02069	TNX-00232
XMH-00941	XMH-01336	XMH-01524	XMH-01605	XMH-01118	FAI-00175	XMH-00831	FAI-02070	TNX-00233/00231/00234
XMH-00942	XMH-01356	XMH-01525	XMH-01617	XMH-01119	FAI-00183	XMH-00832	FAI-02071	TNX-00235
XMH-00944	XMH-01357	XMH-01527		XMH-01120	FAI-00184	XMH-00833	FAI-02072	TNX-00236
XMH-00945	XMH-01361	XMH-01584		XMH-01121	FAI-00185	XMH-00834	FAI-02073	TNX-00256
XMH-00947	XMH-01364/ 01365			XMH-01122	FAI-00186	XMH-00835	FAI-02075	
XMH-00948	XMH-01366			XMH-01123	FAI-00187	XMH-00836	FAI-02076	
XMH-00949	XMH-01367			XMH-01124	FAI-00188	XMH-00837	FAI-02077	
XMH-00950	XMH-01368			XMH-01125	FAI-00190	XMH-00840	FAI-02078	
XMH-00951	XMH-01372			XMH-01128	FAI-00191	XMH-00841	FAI-02079	
XMH-00955	XMH-01384			XMH-01129	FAI-01356	XMH-01414	FAI-02080	
XMH-00957	XMH-01455			XMH-01130	FAI-01357	XMH-01434	FAI-02081	
XMH-00958	XMH-01456			XMH-01131/ XMH-01132	FAI-01885	XMH-01437	FAI-02083	
XMH-00959	XMH-01458			XMH-01133	FAI-01886	XMH-01438	FAI-02084	
XMH-00960	XMH-01459			XMH-01134	FAI-01887	XMH-01439	FAI-02086	
XMH-00961	XMH-01460			XMH-01135	FAI-01888	XMH-01445	FAI-02087	
XMH-00962	XMH-01511			XMH-01136	FAI-01889	XMH-01446	FAI-02088	
XMH-00963	XMH-01526			XMH-01137	FAI-02236	XMH-01447	FAI-02089	
XMH-00964	XMH-01532			XMH-01138	FAI-02392	XMH-01451	FAI-02090	
XMH-00966	XMH-01533			XMH-01139	**YTA**	XMH-01452	FAI-02091	
XMH-00967	XMH-01536			XMH-01140	FAI-01556	XMH-01453	FAI-02094	
XMH-00968	XMH-01537			XMH-01148	XBD-00364	XMH-01454	FAI-02244	
XMH-00969	XMH-01546			XMH-01149	XBD-00368	XMH-01491	FAI-02812	
XMH-00971	XMH-01547			XMH-01150	XBD-00370	XMH-01544		
XMH-00973	XMH-01554			XMH-01151		XMH-01545		

XMH-00975	XMH-01555			XMH-01175		XMH-01549		
XMH-00976	XMH-01585			XMH-01176		XMH-01550		
XMH-00978	**DTA W**			XMH-01194		XMH-01551		
XMH-00979	XBD-00109			XMH-01204				
XMH-01052	XBD-00188			XMH-01278				
XMH-01053	XBD-00189			XMH-01279				
XMH-01054	XBD-00330			XMH-01281				
XMH-01055	XBD-00450							
XMH-01056	XBD-00451							
XMH-01057	XBD-00454							
XMH-01058	XMH-00226							
XMH-01061	XMH-01435							
XMH-01078	XMH-01436							
XMH-01084	XMH-01440							
XMH-01088	XMH-01441							
XMH-01090	XMH-01442							
XMH-01091	XMH-01443							
XMH-01092	XMH-01449							
XMH-01126	XMH-01450							
XMH-01143	**FAI**							
XMH-01144	FAI-00040							
XMH-01145								
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Five-Year Acreage Survey Plan

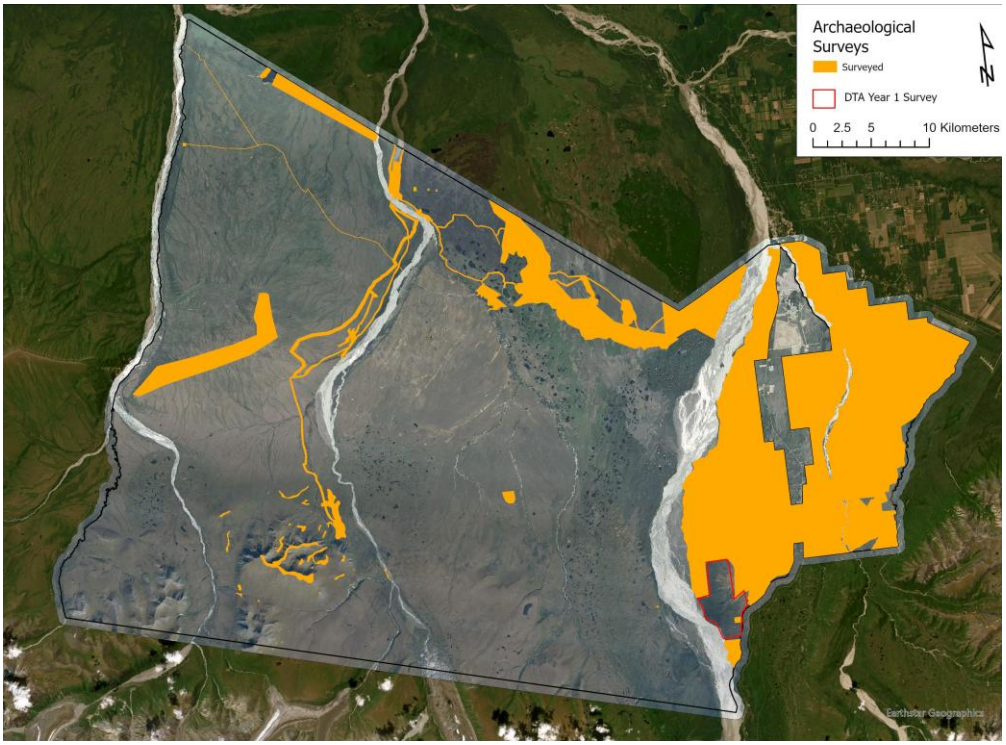


Figure 5. Year 1 (2024) archaeological survey plan.

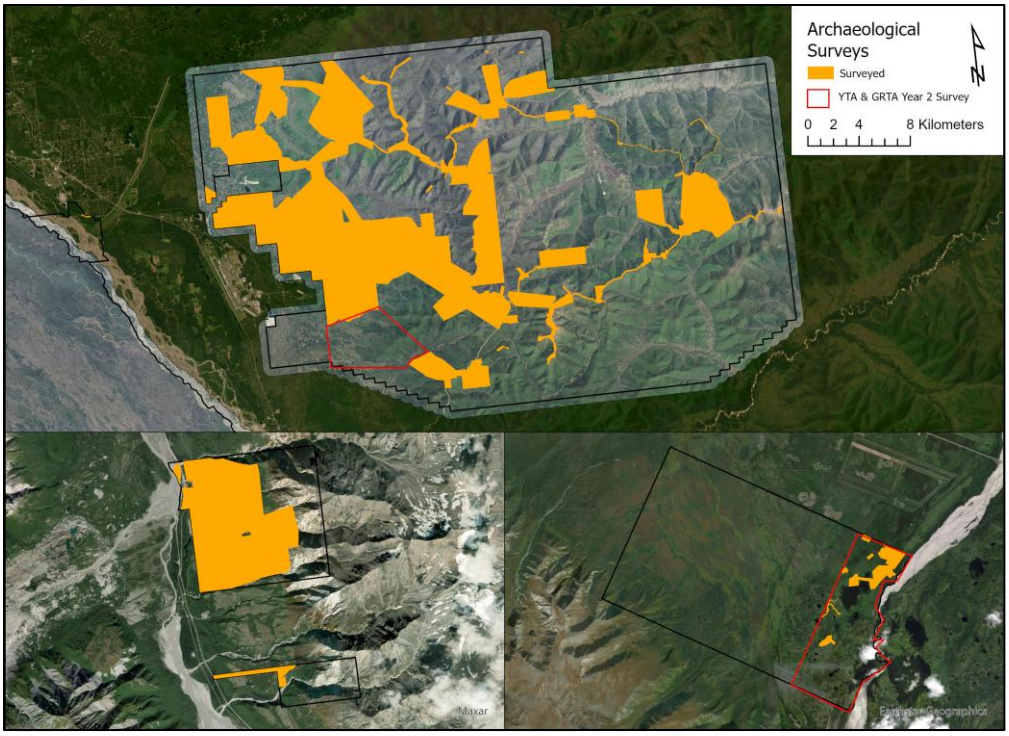


Figure 6. Year 2 (2025) archaeological survey plan.

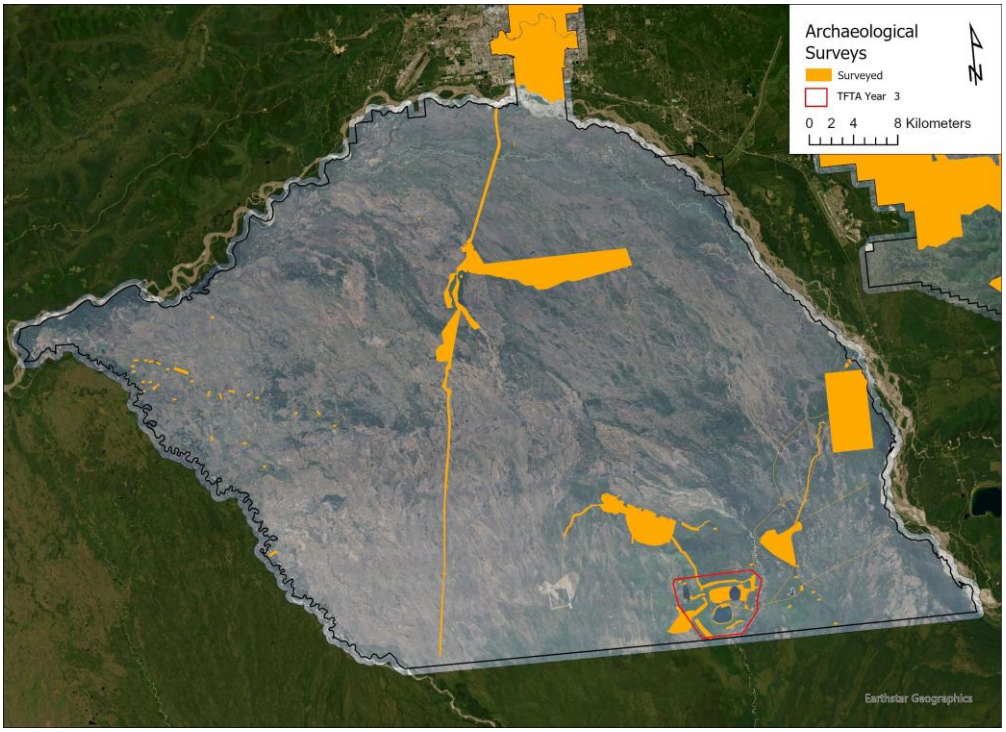


Figure 7. Year 3 (2026) archaeological survey plan.

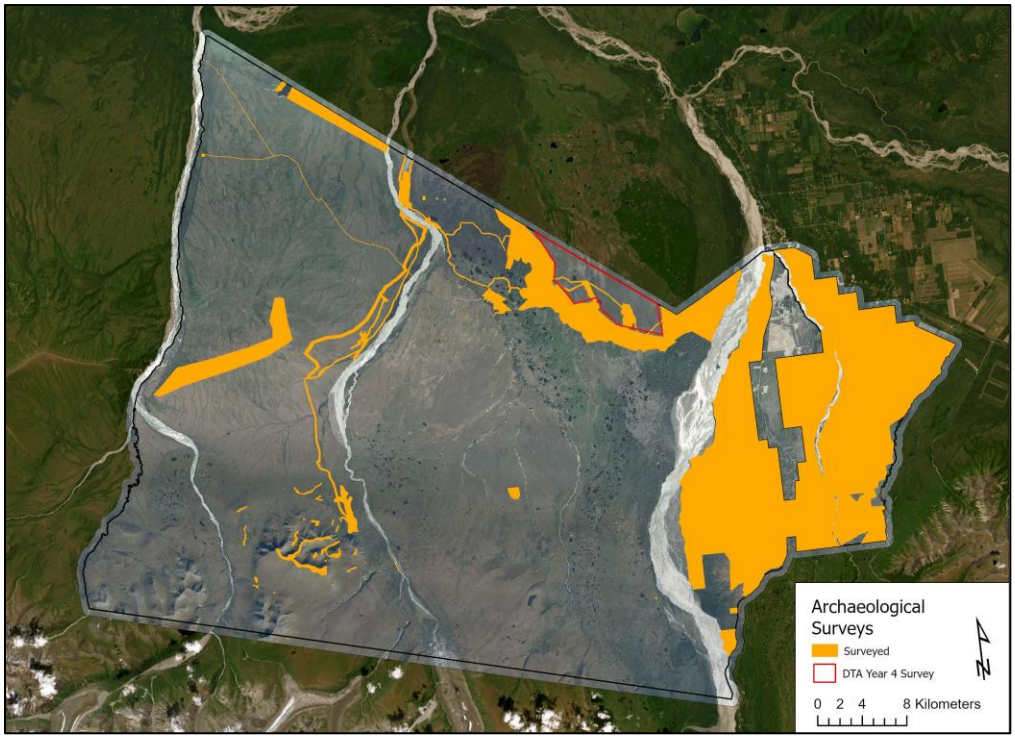


Figure 8. Year 4 (2027) archaeological survey plan.

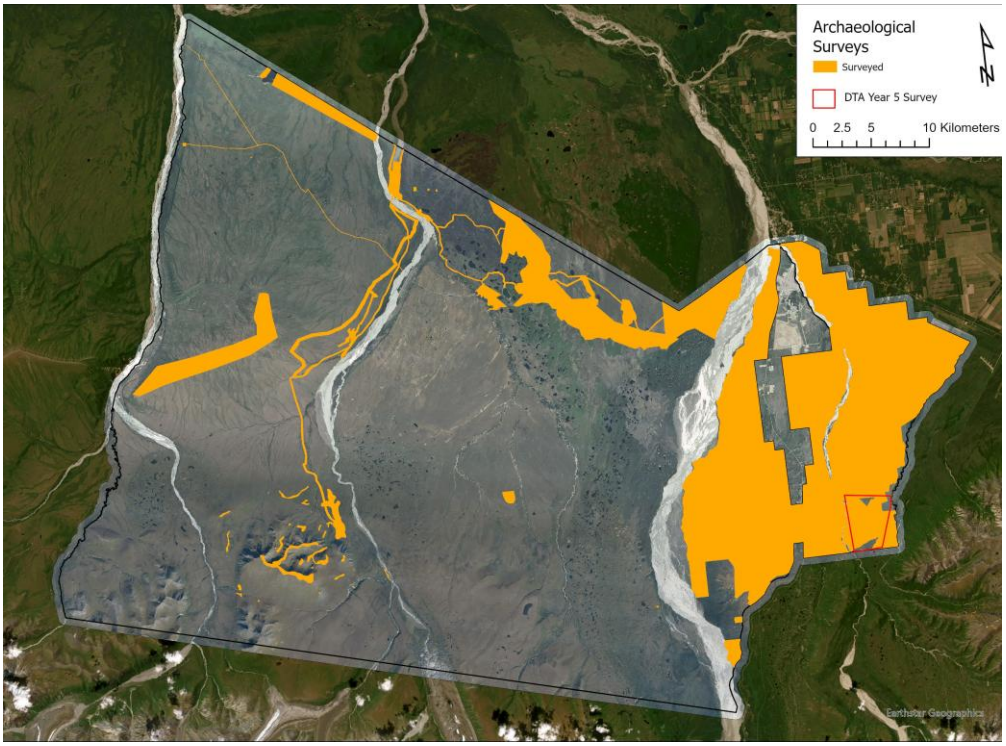


Figure 9. Year 5 (2028) archaeological survey plan.

Five-Year Site Evaluation Plan

Table 8. Five-year site evaluation plan

YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
DTA E	DTA E	YTA, DTA E, DTA W	BRTA, GRTA, WCTA, TFTA	TFTA, DTA W
XMH-01362	XMH-01363	XBD-00033	XMH-01601	FAI-01888
XMH-01374	XMH-01283	XBD-00109	XMH-01606	FAI-01998
XMH-01375	XMH-01286	XMH-00226	XMH-01617	FAI-00189
XMH-01378	XMH-01054	XMH-01437	FAI-02016	FAI-00192
XMH-01380	XMH-01055	XMH-01204	FAI-02018	FAI-02001
XMH-01381	XMH-01057	XMH-01207	FAI-02019	FAI-02002
XMH-01487	XMH-01071	XMH-01209	FAI-02020	FAI-02003
XMH-01511	XMH-01194	XMH-01210	FAI-02044	XMH-01438
	XMH-01195	XMH-01217	FAI-02049	XMH-01439
	XMH-01200	XMH-01218		XMH-01452
				XMH-01453

Appendix H. Government-to-Government Consultation and Coordination

Purpose:
To establish agency Standard Operating Procedures (SOP) and Best Management Practices (BMPs) for conducting government-to-government consultation and coordination between USAG Alaska / USAG Greely and federally recognized Alaska Native Tribal governments. This plan is intended to compliment the Tribal Engagement Plan employed by the garrison command group.

Background:
The foremost principle of United States Indian law is the *trust* doctrine. Tribes are recognized as *domestic dependent nations* with inherent sovereignty. The unique historical relationship between these nations and the United States government results in federal acceptance of certain trust responsibilities, including the protection of Tribal rights and resources. Approximately forty percent, or 229, of the nation's 576 federally recognized Tribal governments reside within the state of Alaska. These governmental bodies, according to federal policy, must be engaged on a government-to-government basis.

Executive Order (EO) 13175: *Consultation and Coordination with Indian Tribal Governments* (6 November 2000) embodies the President's acknowledgement of the federal government's trust responsibility and 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 interaction. This EO requires federal agencies to respect these principles through the promotion of meaningful and timely consultation with federally recognized Tribal governments during the development of agency projects and policies. This was strengthened by the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* (26 January 2021) that called for all agencies to engage in "regular, meaningful, and robust consultation with Tribal Officials" and reinforced a reporting of federal agencies to ensure accountability.

The *Department of Defense American Indian and Alaska Native Policy* [DoD AI/AN] (20 October 1998) outlines DoD's support of and approach to these principles and emphasizes the responsibility of personnel, the importance of understanding and addressing tribal concerns, and the input Tribes should have on agency policies that may potentially 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 those described in Section 7 below.

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

The *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 recommends that each Army installation appoint a Native American Coordinator for the installation. A Department of the Army civilian employee should be used in this capacity to provide longevity and consistency as a point of contact (POC) and to enable greater authority to speak on the Army's behalf, better meeting the needs to the government-to-government relationship.

NLO duties include, but are not limited to:

- Serve as USAG Alaska POC for tribal governments.
- Serve as advisor to the Garrison Commander and personnel, 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 emails, calls, and faxes to Tribes, as needed.
- Maintain accurate data for Alaska Native federally recognized Tribal governments, including personnel, regulation, and protocol information.
- Identify garrison entities and personnel who develop and implement projects with potential to affect Tribal governments, resources, and interests.
- Disseminate project or event-related pertinent information to Tribes in a timely manner.
- Facilitate Army personnel training on American Indian/Alaska Native legal, cultural, and other issues of importance to tribal governments.
- Engage in efforts—in cooperation with designated Tribal representatives—to improve and enhance government-to-government relations.
- Organize working groups of Tribal representatives, Army subject matter experts, and command to increase Army transparency and develop substantive relationships.
- Interface with USARAK and garrison protocol entities to maintain Tribal government representatives are included in appropriate special and public events.

- Maintain administrative record for Tribal contact for each Tribe.

Consultation Participants:
Government-to-government consultation and coordination participants may include, but are not limited to the Garrison Commander; Cultural Resources Manager/Native Liaison; Federally recognized tribal 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 Alaska staff members who are subject matter experts regarding USAG Alaska activities and the potential effects of those activities.

The Alaska Native Claims Settlement Act (ANCSA) of 1971 established regional and village corporations 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 relevant tribal governments. The government-to-government relationship, however, is not applicable to these corporations and dialogue with them is not considered government-to-government consultation. When not specifically invited by a Tribe to join consultation and when activities are not occurring on ANCSA corporation-owned lands, these corporations are given the same consideration as public stakeholders.

Consultation Timing and Purpose:
Army-withdrawn lands in Alaska hold resources customarily and currently utilized by Alaska Native citizens. Consequently, tribal governments have an interest in the current management, past activity, restoration, and future action proposals on those lands. Establishing general and frequent consultation outside of specific action proposals is effective in developing relationships that promote meaningful consultation when specific projects arise and a response is needed.

When Army actions have potential to affect the tribal rights or resources of federally recognized tribal governments and/or their citizens, the garrison must provide potentially interested tribal governments 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.

Consultation Protocol:
Each Tribe is a discreet, sovereign government with a unique cultural identity and, therefore, may have preferential ways of conducting business that should be accommodated as resources allow. USAG Alaska, however, proposes the following BMPs for the consultative process.

- Ensure consultation goes beyond mere notification. Tribes must be engaged prior to decision-making and early in the planning process to allow for better inter-governmental relations, more meaningful input, and an unobstructed mission.
- Allow for adequate time and resources to support consultation and deliberation. Tribal consultation may require more time than consultation with the public. Written correspondence followed by other forms of contact will ensure tracking. Consultation early in any planning process is required to ensure Tribal governments have multiple opportunities to participate and comment
- Hold face-to-face meetings and village-location meetings whenever possible. Face-to-face communication fosters trust and supports substantive, long-term relationships. Meetings held in village locations demonstrate concern/interest and can be cost-effective.
- Initiate government-to-government consultation with only with federally recognized Tribal governments. Native non-governmental organizations are included in the coordination process, only if sanctioned by all involved Tribes.
- Practice inclusivity 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. Current village proximity should not predetermine Tribal inclusivity to consultative processes.
- Honor all made agreements and do not promise more than can be delivered.
- Approach consultation with an openness to hear and discuss tribal concerns, including those not originally scheduled for discussion. This demonstrates a willingness to understand tribal perspective; provides information about how the Army is perceived; fosters trust leading toward meaningful relationships; and provides needs assessment data for future beneficial interaction.
- Accept that agency urgencies may not be Tribal government urgencies. Consultation may take time and flexibility, or contingency consultation plans may be necessary, as the military activity timeline may outpace the timeline required for consultation.
- Do not expect immediate decisions by Tribal leadership/staff should. Tribal leadership may need to discuss decisions and input with their councils.
- Understand Memorandums of Agreement (MOA) or Cooperative Agreements (CA) currently in effect between the Army and individual Tribes. Also regard internal Tribal regulations, ordinances, and protocols addressing government-to-government consultation.
- Plan meetings 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. Plan ahead.

- Send all consultation offers from the garrison commander level via US Mail. Utilize fax, email, and phone calls to ensure receipt and understanding.
- Provide Tribes with all necessary background information far in advance of meeting – who is attending, description of topics, decisions requiring consideration, etc.
- Clarify if government-to-government consultation is not desired by the Tribe. Written notice of declination or requests for informational meeting is preferred
- Hold meetings at mutually agreed upon locations and set agendas cooperatively.
- Escort Tribal representatives when invited to the installation and facilitate travel.
- Ensure meetings are documented using appropriate means – sing in sheet, court reporter, notes takers, etc.
- Ensure participants understand that comments written or recorded during meetings are not privileged in all cases from disclosure under law. USAG Alaska may be required to disclose information 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.
- Provide "official courtesies" 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. It may be appropriate to provide tokens of appreciation to the host Tribe. Food should be provided at meetings as a culturally appropriate demonstration of courtesy and respect.
- Reimburse tribal governments for their representatives' travel to meetings – mileage, accommodations, meals – as funding allows.
- Follow up meetings with notes for consideration sent to attendees and tribal leadership.
- Ensure a complete administrative record of meeting notes, photos, sign in sheets, and other meeting materials.

Relevant Regulations and Guidelines (presented alphabetically)

<u>American Indian Religious Freedom Act (the AIRFA) (11 August 1978)</u>
The 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 the 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 (the ARPA) (11 May 2001)
The ARPA establishes a permit process for the excavation of cultural sites on installation lands. The 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 the ARPA. The USAG Alaska Cultural Resources Manager (CRM) will ensure that tribal consultation has occurred.

Army Regulation 200-1: Environmental Protection and Enhancement (AR200-1) (13 December 2007)
AR 200-1 outlines policies, procedures and responsibilities for meeting environmental compliance and management requirements. Among other things it provides that the Garrison Commander, through the Cultural Resources Program, establish a government-to-government relationship with federally recognized Tribal governments with follow-on activities accomplished by staff. It also requires historic properties; archeological sites; sacred sites; and properties of traditional cultural or religious importance to American Indians, Alaska Natives, and Native Hawaiians be considered *important environmental aspects* given consideration.

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, referenced in AR 200-1.

Department of the Army American Indian and Alaskan Native Policy (24 October 2012,rescinded July 2025)
The Department of the Army American Indian and Alaskan Native Policy was written and signed to recognize the Army's responsibilities to federally recognized Tribal governments and to institutionalize principles for Army interaction with these governments.

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 Alaska, 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 (13 April 2020)
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) (24 September 2018)
DoDI 4710.02 implements DoD AI/AN Policy, assigns responsibilities and provides procedures for DoD interactions with federally recognized Tribal governments and Alaska Native Corporations. It defines consultation triggers (laws, regulations, and executive orders) and provides consultation guidelines. It requires commanders at installations that have on-going consultation and coordination with Tribal governments through an assigned staff tribal liaison.

Department of Defense National Environmental Policy Act Implementing Procedures. 90 FR 27857 (30 June 2025)
DoD NEPA Implementing Procedures provides guidance for implementing NEPA procedures for DoD agencies. These procedures replaced the prior, separate regulations of the Army, Navy, and Air Force, as well as the rescinded government-wide Council on Environmental Quality (CEQ) regulations. The DoD's modern approach prioritizes a streamlined, efficient, and timely environmental review process.

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 Alaska of the existence of a site in order for the site to meet this definition. Sacred sites may include, but are not limited to funerary areas and graves, purification sites, healing sites, special floral, faunal, 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 is only accomplished by consultation with 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 Alaska 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 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, 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 and applies specifically to federally recognized Tribal governments. USAG Alaska is mandated to implement EO 13175 through:

- Identifying USAG Alaska staff and programs that develop and implement programs, projects and activities with potential to affect Tribal governments, lands, resources, and interests;
- Promoting substantive communication between USAG Alaska 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); 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, revised 30 June 2025)

The NEPA created a prescribed means for federal agencies to analyze the effects of proposed actions on the environment. The process is designed to promote the use of citizen involvement and input, as well as other independent analysis, by agency decision-makers. USAG Alaska 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 Alaska Environmental Planner, through the USAG Alaska 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:

- 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, the NHPA, and other federal and state regulations.

National Historic Preservation Act (the 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 effects on historic properties. Historic properties are those listed on or determined eligible for listing on the National Register individually or as part of a larger district. Included in the NHPA 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, 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 disclosure requirements. Revealing the location of archaeological sites and TCPs can compromise their integrity and leave such sites vulnerable to looting (Section 304 of the 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.

Native American Graves Protection and Repatriation Act (the NAGPRA) (16 November 1990) Final Rule (12 January 2024)
The NAGPRA was passed in response to concern over desecration and exploitation of Native American gravesites and appropriation of cultural items. The NAGPRA addresses how remains and items should be transported for repatriation or otherwise documented and studied. The NAGPRA requires USAG Alaska and its employees to employ proper respect, as determined in consultation with concerned Tribes and in accordance with cultural traditions and beliefs. NAGPRA also directs the development of Plans of Action (POA), in consultation with Tribes, regarding the inadvertent discovery of human remains or items of cultural patrimony. Final rule updates introduce significant changes to the procedures for repatriating Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. The goal of these revisions are to streamline the repatriation process, strengthen the role of Indigenous communities, and address shortcomings of the 1990 regulations.

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 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

Federally recognized Consulting Tribal governments

There are ten Tribal governments consulted with regularly due to their connection to or interest in specific land holdings or Army activities. These include Chilkat Indian Village, Chilkoot Indian Association, Village of Dot Lake, Healy Lake Village, Native Village of Minto, Nenana Native Association, Northway Village, Native Village of Tanacross, and Native Village of Tetlin. The Wrangell Cooperative Association has entered a government-to-government relationship with USAG Alaska as follow-on to the 2024 apology given to the community clans via the Tribe for the bombardment of their village in 1869.

Other Tribal governments may express interest in Army undertakings and actions. If any of Alaska's 229 federally recognized Tribal government determine that Army activities or policies may have an impact on their citizenry or their Tribal rights,

resources, or lands, USAG Alaska will openly consult toward resolution. Likewise, if any of the related village or regional Alaska Native Corporations determine that consultation is needed to resolve an issue as defined in DoDI 4710.02, USAG Alaska will participate in a consultative relationship with these entities.

Appendix I. Reports on USAG Alaska-Managed Lands

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