

MATANUSKA-SUSITNA BOROUGH Historical Preservation Commission

Bert Verrall – Chair • Kevin Toothaker – Vice Chair
Andrew Schweisthal • Karla McBride • Fran Seager-Boss • Janet Kincaid • Vivian Smith
Paul Clark – MSB Staff

Regular Meeting

May 21, 2026

Meeting Packet – Table of Contents

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- 143 = Talkeetna Water Tank Project Citizen Petition
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Knik Museum

Mile 13.9 Knik Goose Bay Road, Wasilla, AK 99623

Remote Participation: See attached agenda on p. 1

Planning and Land Use Department - Planning Division

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Bert Verrall – Chair • Kevin Toothaker – Vice Chair
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Paul Clark – MSB Staff

Regular Meeting May 21, 2026, 6:00pm

IN-PERSON: Knik Museum, Mile 13.9 Knik Goose Bay Road, Wasilla, AK 99623

REMOTE PARTICIPATION VIA MICROSOFT TEAMS:

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Meeting ID: 244 391 276 364 86

[+1 907-290-7880](tel:+19072907880)

Passcode: Wr2UN342

Phone conference ID: 236611898#

I. **CALL TO ORDER**

II. **ROLL CALL – DETERMINATION OF QUORUM**

III. **APPROVAL OF AGENDA**

IV. **APPROVAL OF MEETING MINUTES**

A. February 19, 2026

V. **LAND ACKNOWLEDGMENT**

"We acknowledge that we are meeting on traditional lands of the Dena'ina and Ahtna Dene people, and we are grateful for their continued stewardship of the land throughout time immemorial."

VI. **AUDIENCE PARTICIPATION** (three minutes per person, for items not scheduled for public hearing)

VII. **HISTORICAL SOCIETY/MUSEUM UPDATES**

VIII. **STAFF/AGENCY REPORTS & PRESENTATIONS**

A. Staff Report

1. [America 250 Alaska](#) Celebration in the Mat-Su
2. CAMP Training summary
3. Alaska Historical Commission meeting summary

B. Chair Report

C. Re-Awakening Lajat – Fran

IX. **UNFINISHED BUSINESS**

- A. Historic Preservation Plan
- B. Mat-Su Historic Themes Study
- C. DePriest Family Farm NR Nomination Update

X. **NEW BUSINESS**

A. **Knik Museum CLG Grant Proposal**

B. **New Section 106 Consultations**

- 1. Wasilla Main Street Rehabilitation Project
 - Finding of no historic properties affected – Wasilla Community Hall
- 2. ARRC MP 152.1 & 152.3 Bridge Replacement Project
 - Adverse effect finding & mitigation strategy
- 3. West Susitna Access Road Programmatic Agreement
- 4. Denali National Park & Preserve 2026 Project List

C. New Borough Project Reviews

- 1. Talkeetna Water Systems Upgrade
 - Water storage tank location concerns

XI. MEMBER COMMENTS

XII. ADJOURNMENT

Note: agenda items **in bold** indicate decision items

People needing reasonable accommodation to participate in a Historical Preservation Commission Meeting should contact the borough ADA Coordinator at 861-8404 at least one week in advance of the meeting.

MATANUSKA-SUSITNA BOROUGH
Historical Preservation Commission Agenda
February 19, 2026
REGULAR MEETING
Minutes

IN-PERSON: Sutton Library, 11301 N Chickaloon Way, Sutton, AK 99674

I. CALL TO ORDER

BV called the meeting to order at 6:11pm

II. ROLL CALL – DETERMINATION OF QUORUM

Present

Bert Verrall

Karla McBride (via Teams)

Kevin Toothaker

Fran Seager-Boss

Vivian Smith

Absent

Janet Kincaid

Andrew Schweisthal

Quorum is confirmed

III. APPROVAL OF AGENDA

FSB moved to approve the agenda, KT second, no objections, agenda approved.

IV. APPROVAL OF MEETING MINUTES

A. Dec 18, 2025

One correction was identified by the HPC

FSB moved to approve minutes as corrected, KT seconded, no objections, corrected minutes approved

V. LAND ACKNOWLEDGMENT

"We acknowledge that we are meeting on traditional lands of the Dena'ina and Ahtna Dene people, and we are grateful for their continued stewardship of the land throughout time immemorial."

VI. AUDIENCE PARTICIPATION (*three minutes per person, for items not scheduled for public hearing*)

Nancy Dryden

Angie Wade

VII. HISTORICAL SOCIETY/MUSEUM UPDATES

VIII. STAFF/AGENCY REPORTS & PRESENTATIONS

A. Staff Report

- NAPC Commission Assistance and Mentoring Program (CAMP) training available in Anchorage in April
 - **FSB indicated she was interested in attending this training.**
- NAPC Forum travel scholarship application
 - **MSB will submit a grant application for one HPC member to attend.**

B. Chair Report

C. *Re-Awakening Lajat* – Fran

- **Postponed presentation to the next HPC meeting when the other project presenter will be available.**

IX. UNFINISHED BUSINESS

A. Historic Preservation Plan

1. Historic Themes Confirmation
2. Goals/Objectives Confirmation
 - **BV provided comments about the importance of communication and the challenge of accomplishing goals with very limited capacity.**
3. Supplemental Narrative Project

B. DePriest Family Farm NR Nomination Update

- **Fran will reach out to contractor working on nomination to assist as needed.**

C. Section 106 Consultations

1. Talkeetna communications tower – SHPO finding of no impact

X. NEW BUSINESS

A. CLG Grant Cycle – what projects are out there?

- **Fran mentioned a possible interpretive signs project for the Lajat / Scout Ridge trail, possibly for the next grant cycle.**

B. [America 250 Alaska](#) Celebration

1. Baseball – banners at the State Fair + [Week of Dreams](#)
2. What else is going on in the Mat-Su? What do we want to do?
 - a. Mayoral Proclamation

C. Revisiting the Mat-Su National Heritage Area Concept

- **HPC is interested in exploring the possibility of an NHA designation in the Mat-Su.**
- **Paul will make previous draft NHA feasibility report available to HPC to review.**

D. Officer Elections for 2026

- **BV moved to have KT remain as Vice Chair, VS seconded. No objection, KT remains as Vice Chair in 2026.**
- **KT moved for BV to remain as Chair, FSB seconded, no objection, BV will remain Chair in 2026.**

E. Create History / Cultural Resource / Historical Preservation Contact List

F. New Section 106 Consultations

- **HPC reviewed consultation initiation packet from ADOT regarding the Glenn Highway Arctic Ave to Palmer-Fishhook.**
- **FSB noted that there are sites in the APE that should be surveyed based on topography and the likelihood of historic and pre-historic use of the area.**

G. New Borough Project Reviews

XI. MEMBER COMMENTS

XII. ADJOURNMENT

- **KT moved to adjourn meeting, FSB seconded, no objection, meeting adjourned at 8:00pm**

Overview of MSB's Heritage Context

This section provides a brief overview of the history of the Mat-Su Borough from its earliest inhabitants to the present day. Some of these heritage themes have been extensively researched and shared with generations of Mat-Su residents while others are only now becoming understood and shared. This information is intended to be a starting point for further exploration for researchers and all those interested in the history of the Mat-Su community.

Peopling the Mat-Su Borough

Ancient Archaeological Traditions in MSB

So far, the oldest discovered evidence of humans in Alaska is a mammoth hunting camp at Swan Point on the Tanana River near Delta Junction, dated at over 14,000 years ago.¹ There is broad consensus within the scientific community that humans had spread beyond Alaska into North and South America at even earlier dates, but scientists are still working to fit the available evidence into a consistent theory. Archaeologists are currently debating how well evidence supports human presence in the Americas 16,000 to 24,000 years ago at sites such as Cooper's Ferry (Idaho), White Sands (New Mexico) and Monte Verde (Chile).

The puzzle pieces include archaeology at ancient sites, genetic studies to estimate when particular populations separated, and geology to estimate when ice free corridors along the Pacific Coast and the interior of Alaska and Canada were open to allow human and animal migration. Each technique has uncertainty and room for interpretation, and interpretations which promote exceptionally old dates for human arrival are met with the most scrutiny and debate.

If we assume that all ancestors of humans in North and South America crossed through the Bering Strait and Alaska, then at some point in the future we may be lucky enough to find archaeological sites in Alaska which date back even further than the oldest discoveries on the rest of the continent.

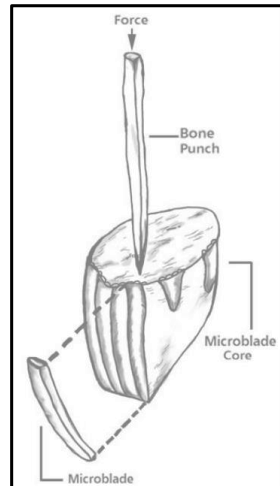
One key challenge is that few artifacts can survive in the ground for that long without decaying. Because stone is less susceptible to destruction than wood, bone, and other materials, stone artifacts usually offer the longest-lasting proof of where and when the earliest humans lived. In the absence of detailed evidence about their cultures and how they are related to more modern groups, we typically identify the oldest indigenous groups that lived in Alaska by the types of stone tools they left behind. Such 'Tool Traditions'

categorize how humans made things in the past, how they lived and interacted with their surroundings, and how they developed over time.

American Paleo-Arctic (14,000 - 5,500 Years Ago)

The 14,000-year-old mammoth hunting camp at Swan Point is the deepest layer of a site which was used by many generations of Alaskans all the way up to the modern day.ⁱ The oldest set of tool patterns found at that site fit into the Dyuktai (also 'Diuktai' or 'Yubetsu') tool tradition mainly found in Siberia, making those ancient artifacts "some of the oldest evidence of the cultural connection between America and Asia."ⁱⁱⁱ Slightly younger artifacts at Swan Point fall into the Nenana and Denali tool traditions, or tool complexes, which represent the first "distinct tool manufacturing techniques" developed in Alaska rather than being carried across the Bering Land Bridge by the Asian ancestors of Native Americans.^{iv}

The defining technology of the Denali Complex was the microblade, which are small sharp flakes of rock chipped off of a wedge-shaped 'core.' Multiple microblades would be set in a groove in a wood or bone handle to form tools with a continuous cutting edge, like closely spaced teeth on a saw blade. In addition to microblades and cores, Denali Complex tool kits also included large blades, chisel-like engravers called burins, hide-scrapers, large stone choppers and mauls, and both unifacial (one edge sharpened) and bifacial (both edges sharpened) knives.^v



"[Microblade Toolkit]," Illustration by Duleepa Wijayawardhana, based on original by Ralph Pastore, courtesy of the [The Newfoundland and Labrador Heritage Website](#).

Commented [GV1]: e.g. Dixon et al., Table 8.21. 'Sites Ascribed to the Late Denali Complex'

The Nenana Complex describes the toolkit found at ancient sites with large blades knapped from rock flakes similar to the Denali Complex, but without any evidence of microblades.^{vi} There is ongoing debate whether the Nenana and Denali tool complexes are actually distinct from each other or if they are better considered two parts of the same set of techniques, and how they relate to the Clovis Complex found throughout much of North America.^{vii} As one researcher points out, “not all sites will display every tool in the tool kit.”^{viii} The landscape of what is now known as the Mat-Su Borough was covered in glaciers and uninhabitable in the Dyuktai tradition’s heyday, but Nenana and Denali Complex artifacts are found at the oldest known sites in the area.^{ix}

Commented [GV2]: Holmes (2008) p.73

The Denali Complex especially is associated with a hunting culture which developed in Interior Alaska during the late Pleistocene, roughly 14,000 to 12,000 years ago. At that time the climate was much colder and drier than today but warming enough to melt new corridors through the continental-size ice sheets which had previously covered most of Alaska and Canada. It is worth noting that salmon bones have been found in a cooking hearth dated to 11,500 years ago, connecting one of the most iconic food sources in Alaska back to the earliest inhabitants and challenging a popular imagination of Stone Age humans as only focusing on mammoth, bison, and other massive land animals.^x

The overall picture suggests that hunters and gatherers first spread from the Tanana River Valley south through the Alaska Range roughly 13,000 years ago, shortly after major corridors through the mountains like “the Nenana, Delta, and Swift River Valleys had deglaciated and vegetated.”^{xi} In the Susitna River Valley, the oldest known sites have been dated to around 12,700 years ago. Archaeological digs within the last 10 years have uncovered hearthstones and other artifacts in the foothills of the Copper River Valley’s Wrangell Mountains estimated to be 13,000 years old.^{xii}

The glacial melting and warming climate in the Copper River Basin produced huge amounts of freshwater which was blocked from draining to the sea by the Chugach Mountains and its coastal glaciers. For thousands of years, the dominant landscape feature experienced by the earliest residents of the modern Mat-Su Borough was Glacial Lake Atna, a vast inland lake stretching across the entire Copper River Valley from Nelchina to Glenallen, Chitina, and the edges of the Alaska Range. At its deepest point during human habitation the lake shore reached 2500 feet elevation, almost 1500 feet above the roads and houses in some places on the current valley floor such as Kenny Lake.^x

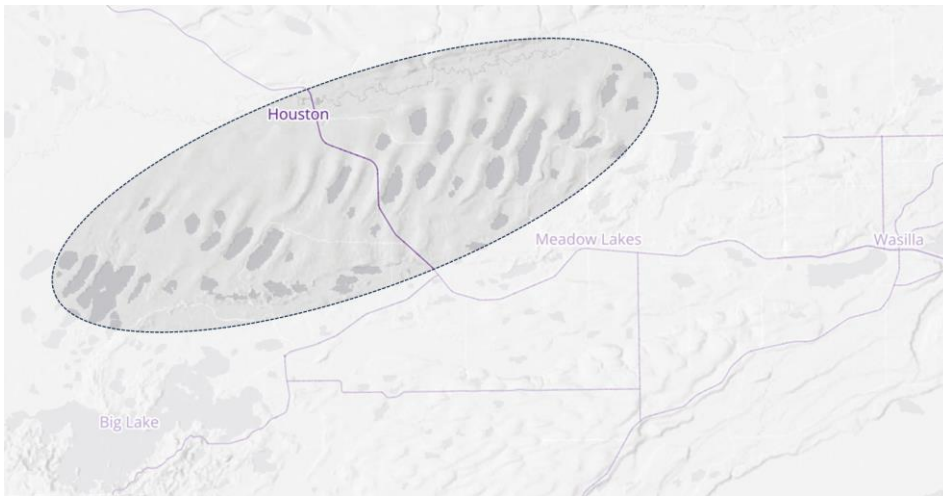
Commented [GV3]: Smith (2019) Fig. 4, p13 shows lakeshore elevations from 752-762m (~2500 ft) in the 13000 – 10000 YA timeframe. Kenny Lake is approximately 1100 ft with even lower surrounding landscape.

Ancient archaeological sites with Denali Complex artifacts are typically found along ridges which are now high up in mountain foothills, but which were lake shorelines in the timeframe the sites are dated to.^{xiii} The geology of dating the clay and sand layers marking the ancient lakeshore backs up the archaeology of carbon dating the artifacts. The high-

elevation Tangle Lake Archaeological District, in the northern part of the Mat-Su at about 3000 feet above sea level, contains more than 600 archaeological sites.^{xiv}

Lake Atna drained in a series of megafloods before and during human habitation, finally emptying to current lake levels around 10,000 years ago. Models and measurements of those floods suggest they were some of the largest freshwater floods ever seen on earth. They carved canyons, transported 6-foot boulders, and are thought to have created the parallel lakes and 90-foot dunes in the Meadow Lakes area of the Mat-Su near Wasilla. Huge floods would also explain certain modern day oddities. The pygmy whitefish, common in the Copper River Valley including in “three Lake Atna remnants: Tazlina, Klutina, and Tonsina lakes,” surprised biologists when it was found in Lake George at the head of the Knik River. A huge flood washing fish species across the landscape into new habitats would explain why Lake George is “the only known pygmy whitefish habitat in the entire Cook Inlet basin.” Clay and silt deposited by large freshwater floods would also explain a particularly weak layer in the notorious Bootlegger Cove clay formation, which caused extensive landslides in Anchorage’s Earthquake Park neighborhood during the 1964 Alaska earthquake.^{xv}

Commented [GV4]: Smith (2019) p13: “The majority of primary work (cited here) supports evidence that the lake lasted as late as ~9400 rcybp (10,274–10,905 cal bp)”



Parallel dunes and lakes between Houston and Meadow Lakes, titled the ‘Wasilla-Area Very Large Dune Train’ by Wiedmer (2010). Dunes decrease in height from 100 feet to 15 feet trending away from the Matanuska Valley. Statistical modeling suggests that it would have required an outburst flood with waves up to 300 feet deep to create these features, and that an outburst flood from Lake Atna could have produced that.

Placeholder

Ten thousand years ago, humans wielding Denali Complex tools watched a landscape of melting glaciers and megafloods reveal new lowlands and new corridors to coasts humans had not yet visited on Cook Inlet and Prince William Sound. The warming climate was causing the disappearance of the steppe-tundra landscape and mega-fauna like the mammoth, giant steppe bison, and giant beaver, but ushering in the boreal forest and smaller animals like the caribou. Denali Complex techniques would continue to be used for thousands more years. In fact, most archaeological sites in the Mat-Su with Denali Complex artifacts are between 8,000 and 5,000 years old. But the need to adapt to the changing landscape would trigger new developments in tool manufacturing and other aspects of human cultures.

Northern Archaic (7,000 – 1,500 Years Ago)

The Northern Archaic tool tradition emerged after the Denali Complex tool tradition, but the two styles were produced in overlapping time periods of several thousand years. A distinguishing early innovation of the Northern Archaic toolkit, which is not found in the Denali Complex, is the notched projectile point. Points with side and corner notching could be more securely fastened to a shaft, creating more effective spears and arrows for harvesting smaller game species and fish.^{xvi} By 4,500 years ago stemmed points had also been added to Northern Archaic techniques, further improving the ability to make lightweight arrows and harpoons.



Modern reproductions of Northern Archaic points from Interior Alaska by Canadian archaeologist Tim Rast, 2015. "A flintknapping reduction sequence from a hard hammer flake (left) to a soft hammered biface (middle) to a projectile point finished with pressure flaking." Pending licensing

While Denali Complex tools were well suited for hunting big game species, the Northern Archaic adaptations produced more effective tools for smaller game and marine resources such as salmon fishing. Archaeological evidence shows this was an intentional strategy corresponding to changes in lifestyles. At the same time the Northern Archaic tool tradition

Commented [GV5]: Following Gillispie (2018), Fig. 5 / p.5

The Northern Archaic

Above, the section range for the American Paleoarctic . This does not, but adjusts the range backward, and forward to account for noted overlap of Denali Complex techniques with Northern Archaic techniques in the area of interest.

Commented [GV6]: Holmes (2008) p.72: "Notched points occurred only in Phases 1–3 and were the only "point" forms present, whereas Phases 4–6 had a variety of stemmed and "oblanceolate" point forms. It is important to remember that the Northern Archaic tradition is more than just notched points."

Compare to Anderson (2008) Fig. 1 / p.172 showing Phase 4 ca. 4400-4300 BP

was developed, caribou bones become more common than bison bones in archaeological sites in Interior Alaska and archaeological traces begin to appear of humans in the lowlands which had been previously covered by glacial lakes.

Commented [GV7]: “caribou bone began to appear in sites in higher percentages relative to bison, which were probably declining in abundance.” Gillispie, p.13

Commented [GV8]: Smith (2019), p.18-19

Just like the discussion about whether to lump or split the Denali and Nenana Tool Complexes in the earlier Paleoarctic era, the scientific community is trying to understand and find more evidence about how, or if, Northern Archaic and Denali Complex tools relate to each other.^{xvii} Both toolsets make use of microblades, although some Northern Archaic period sites contain microblades made with techniques not associated with the Denali Complex.^{xviii} Some archaeological sites have both side-notched points and tools which resemble the Denali Complex within the same time period. Meanwhile, toolsets which can be produced entirely with Denali Complex techniques have been recovered in the Mat-Su at archaeological sites believed to be as recent as 3,500 to 1,500 years old.^{xix}

Commented [GV9]: “Although microblades continued to be made in smaller numbers, the stone cores from which they were flaked included new tabular and conical shapes.” – Gillispie (2018), p.15

Commented [GV10]: See Dixon (1985) 8-178, ‘Late Denali Complex: ca. 3500 B.P.- ca. 1500 B.P.’

These investigations fit into an overarching debate in the scientific community since the 1960s weighing to what degree “differences in archaeological components may represent different cultures and/or peoples” versus “differences represent different activities performed by the same people” in the ancient past.^{xx} In this example, the first interpretation might look like separate hunting groups moving into the emerging lowlands and boreal forests with a younger Northern Archaic toolkit while other groups stayed in the upland steppe-tundra landscape still pursuing an older lifestyle hunting dwindling herds of bison and large game with Denali Complex toolkits. The second interpretation might look like the same groups of humans traveling between both environments based on season, preference, or the availability of game and using the best-suited tools for the job. Other points of discussion include whether new techniques were innovated locally, or adopted from neighboring or migrating cultures.^{xxi}

Regardless of the exact details of how lifestyles evolved in the uplands of the upper Susitna and Copper River Valleys, the same environmental changes and tool innovations seen were opening a new entry point to the modern Mat-Su along its coastal boundary at Cook Inlet. Glacial retreat began exposing beaches along Alaska’s southern coast line including the Cook Inlet Basin at the same timeframe that ice withdrew south of the Alaska Range, roughly 14000 years ago.^{xxii} Unlike archaeology in Interior Alaska, however, there currently no known traces that humans moved in to upper Cook Inlet shortly after the ice melted. The current interpretation suggests that permanent coastal settlement along Upper Cook Inlet was delayed for thousands of years until the development of more substantial “ice free travel corridors and open spruce woodlands” around 8000 to 9000 years ago.^{xxiii}

This interpretation is heavily based on the lack of archaeological evidence, and scientists recognize that even if early coastal inhabitants did exist direct proof of them might be

destroyed. We would have to be extremely lucky to find archaeological remains anywhere along a glacier-scoured coast exposed to harsh weather where sea levels have risen to cover the Bering Land Bridge and any early beaches. The same problem is a crucial hurdle to confirming a theorized coastal migration route for early humans to spread into North and South America.

“If a prehistoric site [around 14000 years old] was found anywhere along Alaska’s southern coastline it would be one of the most important discoveries in the history of New World archaeology.”

- Thomas Gillispie, Alaska Office of History and Archaeology, 2018

At this point in time the earliest known archaeological site in the coastal region of the Mat-Su is near Long Lake, along the Glenn Highway close to Chickaloon, dated to approximately 6600 years ago. That site, and others with similar ages at Beluga Point along Turnagain Arm and Round Mountain on the Kenai River, feature general microblade and core artifacts which are not very distinguishable from general techniques found throughout the rest of Alaska.^{xxiv} The toolkits suggest that the early coastal inhabitants were following a common strategy of early humans anywhere in Alaska: “occupying high ground and overlooking prime hunting areas” for large land mammals.^{xxv}

However, later tools found at Beluga Point included forms not found in interior Mat-Su sites. Tools whose ages were bracketed from 5600 to 4200 years ago featured distinctive stemmed, chipped stone projectile points and high-shouldered knives that were similar to earlier coastal culture tools found in Cook Inlet.^{xxvi} From that point forward, the archaeological picture in the Mat-Su contains more and more diverse and specialized technology. The trend reflects how different groups developed distinct lifestyles in the wider variety of ecosystems and species created by the warming climate, retreating glaciers, and draining glacial lakes. More evidence is available at the younger sites in the forms of metals, leathers, textiles, and human remains which have survived for respectful examination. The archaeological picture begins more clearly lining up with the traditions and memories of modern indigenous communities. Combined, these factors allow scientists to transition from more tentatively describing ‘tool traditions’ to more confidently discussing specific ‘cultures.’

Transition to “Culture”

The most ancient human communities in Alaska are described with the ‘tool traditions’ discussed above because their stone tool points are the only artifacts which have survived, leaving little evidence of their languages, beliefs, and cultural identity. For archaeological sites from the more recent past, more varied sets of artifacts can survive and provide a more complete picture of the society which created them. Those details can be compared with and confirm the traditions and memories of modern descendant communities. The additional information found in more recent sites allow archaeologists to more confidently link them to communities with a specific cultural identity rather than with a label based on general tool technology.

It is important to remember that the earliest confident date an archaeologist could apply a cultural label by examining artifacts is not the same as the birth date of that culture. For example, physical evidence alone cannot confirm how the Denali and Northern Archaic toolmakers entering the Mat-Su from north of the Alaska Range starting 13,000 years ago would have described or grouped themselves, but the oral histories of modern indigenous populations along with genetic and linguistic evidence all indicate that those humans were their direct ancestors with a continuous culture and language.

Alutiiq/Sugpiaq People

As mentioned above, the environmental conditions of coastal Alaska make it tricky to pinpoint the earliest groups of humans to focus on the sea, either as a permanent home in Alaska or as a stopover point migrating to the rest of the Americas. Signs of marine specialization throughout southern Alaska, including Kodiak and the Alaska Peninsula, can currently be dated back from 9000 to 7000 years ago.^{xxvii} Based on the artifacts found at Beluga Point, those populations or their influence had spread to upper Cook Inlet some time around 5000 years ago. In the Mat-Su Borough, other portions of Cook Inlet, and Prince William Sound, these oceangoing specialists developed into the Alutiiq/Sugpiaq culture.

“Sugpiaq,” meaning “Real People,” is the original name Alutiiq people gave themselves in their native language Sugcestun. The name “Alutiiq” is a term adopted from the Russian plural form of “Aleut.” Aleut is a term used by early Russian explorers to describe members of both the Unangaꝯ and Sugpiaq cultures who they met between Attu and Kodiak.^{xxviii} Both

Commented [GV11]: Wygal and Goebel (2012) p.47

are seafaring cultures; the Unangan inhabit the Aleutian and Pribilof Islands while the Sugpiaq populated Kodiak Island, Prince William Sound, Cook Inlet, and the outer Kenai Coast.

The first Alutiiq subcultures which developed around Cook Inlet are referred to as the Ocean Bay and Kachemak cultures or traditions. Academic literature from the 1970s-1990s drew a distinction between the two based on the available evidence at the time, but a more recent discussion suggests that “the Early Kachemak Tradition now seems to have developed seamlessly [...] without a time gap” based on “many Early Kachemak Tradition occupations, often resting on top of earlier Ocean Bay sites, [having] artifacts showing technical and stylistic characteristics bridging the two cultures.”^{xxxix} The Kachemak tradition seems to have developed in the Kodiak Archipelago before spreading to the mainland of Alaska.^{xxx}

The Cook Inlet groups adapted to river travel and the use of land-based resources and freshwater fish much more than other Alutiiq societies, such as Kachemak societies on Kodiak and the Outer Kenai Coast, which centered heavily around marine resources such as whales.^{xxxi} The term ‘Riverine Kachemak’ has been used to describe this specialized inland Alutiiq subculture, whose sites have been found hundreds of miles upriver from the coast. Sites such as Hewitt Lake on the Yentna River, 75 miles up the Susitna Valley from Knik Arm, have been identified as Riverine Kachemak based on ground slate artifacts resembling those at Pedro Bay and Beluga Point, notched stones commonly used as fishing net weights, and personal jewelry like labrets which were worn by Alutiiq populations into the 19th Century.^{xxxii} The Hewitt Lake site has been dated to roughly 4500 years ago, similar to Riverine Kachemak sites 80 miles up the Kenai River near Kenai Lake.^{xxxiii}

There is more indirect evidence that the Alutiiq probed even further inland at various points in history from the Dene or Athabascan culture, who occupied most of Interior Alaska including the Mat-Su Borough and later also much of Cook Inlet. *Skestnaey Deltsesi*, a pond near the headwaters of the Gulkana River north of Lake Louise, means “made red by the Alutiiq” in the language of the local Dene tribe, the Ahtna. A second Ahtna site in the Copper River Valley, *Skestnaey Kuztsesden* on the Tazlina River, translates to “where the Alutiiq made a mark.”^{xxxiv} Closer to the coast, the Dena’ina tribe preserve multiple oral histories of war and trading. Shem Pete, a Dena’ina culture bearer and historian who passed away in 1989, is an especially important source of oral history to compare and make sense of the archaeological record. Shem Pete memorized details including conflicts and locations where Alutiiq people once had their villages, and preserved the tribal history of the Dena’ina driving the Alutiiq out of the area “back up north” in the Susitna River Valley.^{xxxv}

The Riverine Kachemak motivation to move inland and focus on freshwater resources is unclear. Theories include a desire to pursue land-based resources such as salmon runs or fur bearing animals, or to avoid volcanism, earthquakes, glacial advances, or human population stress on food sources of the Kenai Peninsula.^{xxxvi} There is a great need for additional archaeological survey work to learn more about the history of the Riverine Kachemak and broader Alutiiq culture in coastal regions of the Mat-Su such as Knik Arm and the Susitna River basin.

But the Alutiiq footprint in the Mat-Su Borough was transient despite lasting several thousand years. The Alutiiq withdrew from permanent settlements in upper Cook Inlet roughly 1000 years ago to their present territories in Kodiak, the Kenai Peninsula coast, and Prince William Sound. They continued to raid and trade into 19th Century with the Dene, the primary indigenous group in the Mat-Su Borough by any standard of duration or extent of territorial control.



Kachemak Culture stone lamp, 4/9236, National Museum of the American Indian.

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- ⁱ Brian T. Wygal and Kathryn E. Krasinski, "Post-Glacial Human Colonization of Southern Alaska: The Archaeology of Trapper Creek," *Alaska Journal of Anthropology* 17, no. 1&2 (2019): 77-101. https://www.academia.edu/40697965/Post_glacial_human_colonization_of_southern_Alaska_The_archaeology_of_Trapper_Creek
- ⁱⁱ Joshua D. Reuther, Charles E. Holmes, Gerard M. Smith, Francois B. Lanoe, Barbara A. Crass, Audrey G. Rowe, and Matthew J. Wooller, "The Swan Point Site, Alaska: The Chronology of a Multi-Component Archaeological Site in Eastern Beringia," *Radiocarbon* 65, no. 3 (2023): 693-720. <https://doi.org/10.1017/RDC.2023.30>
- ⁱⁱⁱ Eugénie Gauvrit Roux, Yan Axel Gómez Coutouly, Charles Holmes, and Yu Hirasawa, "Early Beringian Traditions: Functioning and Economy of the Stone Toolkit from Swan Point CZ4b, Alaska," *American Antiquity* 89, no. 2 (2024): 1-23. <https://hal.science/hal-04538955/file/early-beringian-traditions-functioning-and-economy-of-the-stone-toolkit-from-swan-point-cz4b-alaska.pdf>
- ^{iv} 2001 Tanana River Valley Archaeology Circa 14,000 to 9,000 yrs. bp. *Arctic Anthropology* 38(2): 154-170.
- Charles E. Holmes, "The Taiga Period: Holocene Archaeology of the Northern Boreal Forest, Alaska," *Alaska Journal of Anthropology* 6, no. 1&2 (2008). https://www.alaskaanthropology.org/wp-content/uploads/2017/08/akanth-articles_264_v6_n12_Holmes.pdf
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THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation
and Public Facilities

DESIGN & ENGINEERING SERVICES
PRELIMINARY DESIGN &
ENVIRONMENTAL

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In Reply Refer To:
Wasilla Main Street Rehabilitation Project
STP-001(408)/60077
Finding of No Historic Properties Affected
March 24, 2026

MSB Historical Preservation Commission
350 E. Dahlia
Palmer, AK 99645

Dear Commissioners:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has assumed the responsibilities of the Federal Highway Administration (FHWA) under 23 United States Code (U.S.C.) 327 and is proposing to improve traffic flow and relieve congestion in downtown Wasilla, within the Matanuska-Susitna Borough, Alaska, through the Wasilla Main Street Rehabilitation Project (Project). Road improvements and traffic pattern changes are planned for several downtown Wasilla roads in the Anchorage C-7 quadrangle (Table 1). The environmental review, consultation, and other actions required by applicable Federal environmental laws for the Project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 13, 2023, and executed by FHWA and DOT&PF.

Table 1. MTRS and USGS Quadrangle for Project Area of Potential Effects (APE).

Township	Range	Section(s)	Meridian	USGS Quadrangle
017N	001W	03, 09–10, and 15	Seward	Anchorage C–7

Consultation for the Project is being conducted in accordance with the 2017 *First Amended Programmatic Agreement... for the Federal-Aid Highway Program in Alaska*. DOT&PF, acting as a Federal agency, finds an adverse effect on historic properties by the proposed Project pursuant to 36 Code of Federal Regulations (CFR) 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(e).

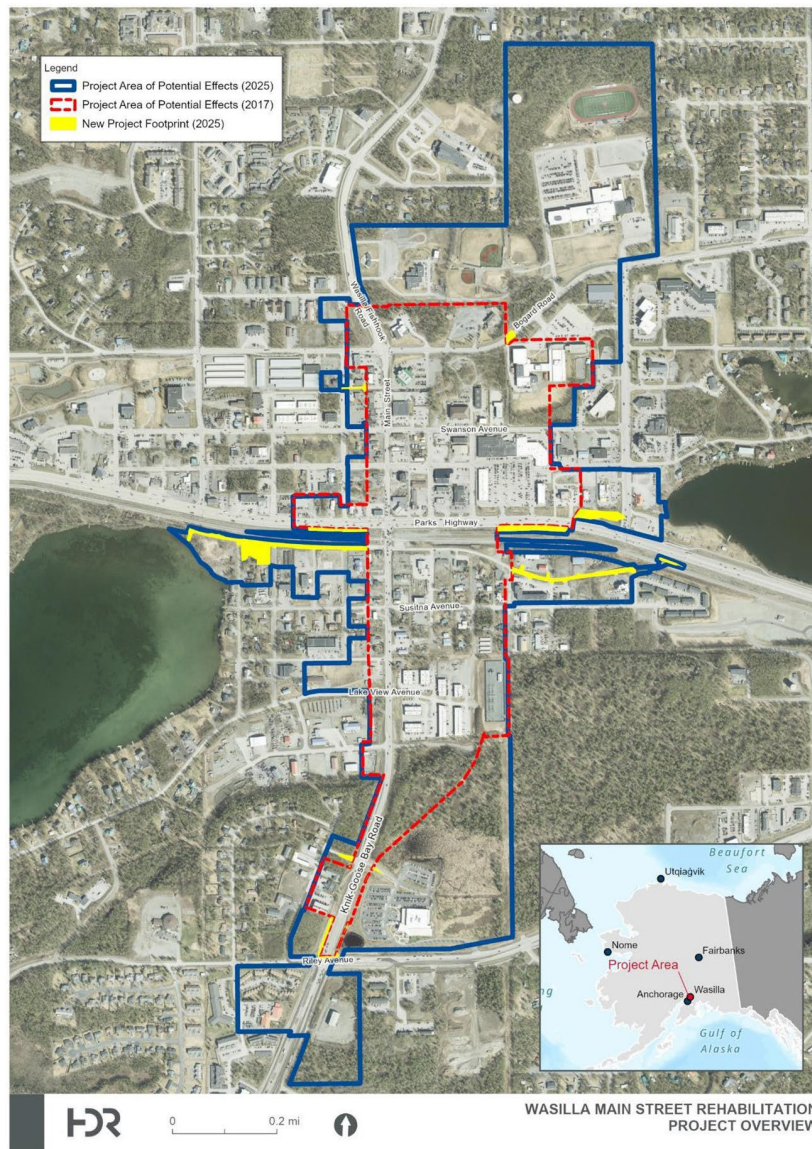
“Keep Alaska Moving through service and infrastructure.”

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by DOT&PF pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated November 3, 2017 and executed by FHWA and DOT&PF.

PROJECT DESCRIPTION

The Project consists of road improvements and traffic pattern changes aimed at relieving congestion and improving traffic in downtown Wasilla, Alaska. The Project would include Main Street, Yenlo Street, Knik-Goose Bay Road, Talkeetna Street, and Bogard Road.

Project activities include construction of a pair of one-way couplets on Main/KGB and Yenlo/Talkeetna streets; redirect stormwater drainage; pedestrian and bicycle amenities constructed to ADA standards; reconfigure intersections with the Parks Highway and Alaska Railroad main line; install new traffic signals, lighting and equipment; and minimization of retaining walls and grade changes to preserve existing properties where possible.



Area of Potential Effect

REVISED FINDING OF EFFECT

This project has been in development since 2011 with the first findings letter describing a smaller project submitted August 9, 2012. The SHPO concurred with a finding of no adverse effect to historic properties by letter of August 16, 2012.

The project was revised in 2016 and an updated letter finding no historic properties affected for a larger project was submitted to consulting parties on April 17, 2018. The SHPO requested clarification of these findings by letter of April 27, 2018. DOT&PF submitted an updated findings letter on June 19, 2018, and the SHPO concurred with the updated finding of no historic properties affected on July 12, 2018.

The project was revised again in 2024 with a larger APE. DOT&PF contractors evaluated buildings in the expanded APE and those previously evaluated which may have aged in since 2018. These included historic buildings relocated to lots on Block 8 of the Wasilla Townsite, USS 1175. The updated project design includes an ADA compliant sidewalk on Main Street that required the removal of the encroaching front porch of ANC-00135, the Community Hall, a National Register of Historic Places (NRHP) listed property built on the municipal reserve lot of Block 8 in 1930 (Figure 1). Dredge buckets temporarily placed in the ROW were removed by the property owner, the City of Wasilla. The property owner proposed removing the porch entirely due to decay to the log structure and attractive nuisance uses of the porch by unhoused people. DOT&PF proposed to the property owner that the façade change would risk the delisting of the building from the NRHP due to loss of a significant character defining feature and proposed reconstruction of the porch so that it was narrower and no longer a right of way (ROW) encroachment, retained its appearance to viewers on Main Street, and would be less attractive as a shelter.

To this end a finding of adverse effect was submitted June 30, 2025, and DOT&PF drafted a memorandum of agreement (MOA) to mitigate the adverse effect to ANC-00135 and provide Historic American Building Survey (HABS) level documentation for management of buildings on Block 8 of the Wasilla Townsite found not eligible at this time, but which could gain significance in the next ten years. SHPO responded with a request for more information regarding some of the buildings assembled on Block 8 which had been relocated to create an assemblage called the Frontier Village Historic Park (FVHP) by letter of August 29, 2025. Buildings on Block 8 include a number which were moved from other locations to this block less than 45 years ago, or constructed less than 45 years ago, and thus too recent for consideration of significance in the absence of exceptional significance.

DOT&PF developed additional historic information to contextualize the FVHP considering the SHPO questions. DOT&PF submitted a conditional finding of no adverse effect to historic properties based on consideration of the mitigation efforts and conditional on signing of the MOA between DOT&PF, the SHPO, and property owner City of Wasilla to mitigate adverse effects to ANC-00135 through reconstruction of the porch to its historic appearance outside the ROW, additional funding for building stabilization, and photographic documentation of the FVHP and other buildings and structures on Block 8 of the Wasilla Townsite to HABS standards to support the incorporation and management of the buildings as a historic district as contributing properties aged in. This finding was submitted by letter of January 7, 2026. The SHPO concurred with the finding by letter of January 16, 2026.

Subsequent discussion between Central Region project management and the Statewide Environmental Office (SEO) resulted in the finding that the conditional no adverse effect approach could not support a *de minimis* finding for the purposes of Section 4(f) of the DOT Act. The SHPO in discussion with the Advisory Council on Historic Preservation (ACHP) indicated that an adverse effect finding must be made and could not be made conditional on mitigation agreements. Consultation between the project team, SEO and the SHPO redirected the project towards a net benefit approach to 4(f). The 4(f) standard requires evaluation to determine whether there is a feasible and prudent alternative to the use of a historic property. This deliberative process resulted in reconsideration of the ROW encroachment and project management determined that it would be preferable to permit the encroachment of ANC-00135, the Wasilla Community Hall, in the ROW (Figure 2). This avoids 4(f) use of the historic property. Negotiations with the City of Wasilla and the ROW group in Central Region DOT&PF will permit the encroachment into the ROW for the Wasilla Community Hall, ANC-00135.

DOT&PF finds that because no effects would occur to ANC-00135, a **finding of no historic properties affected** is appropriate for the project. No other historic properties will be affected by project activities as documented in previous findings letters for the project. Because DOT&PF has determined to permit the ROW encroachment for ANC-00135, there will be no effect to that historic property. The building will remain unchanged in its present condition and appearance and the proposed ADA sidewalk will be reconfigured to avoid the need for changes to the building. DOT&PF will submit the information gathered as part of the intended mitigation to the City of Wasilla and the SHPO to assist in managing the anticipated development of a historic district on Block 8 of the Wasilla Townsite which would include ANC-00135 and other structures built or moved to lots in the block for the purpose of historic preservation.

CONSULTATION

Previous consultations occurred for the Project in 2011, 2018, and 2025. Responses to the 2025 consultation letters were limited to the SHPO and Chickaloon Village Tribal Council (CVTC) which stipulated that for the current consultation they wished DOT&PF to reiterate that Wasilla is named for an esteemed Alaska Native political leader and is located on lands formerly occupied by Alaska Native peoples before the historic era occupation by European Americans. DOT&PF so notes these facts here.

Because the finding has changed from adverse to no historic properties affected, this letter will be submitted to all previous consulting parties for review. This will include the SHPO, City of Wasilla, Knik Tribe, Knikatnu Inc., Chickaloon Village Tribal Council, Chickaloon-Moose Creek Native Association, Matanuska Susitna Borough, and the Wasilla-Knik Historical Society.

If you wish to comment on this finding, I can be reached at the address above, by telephone at (907) 269-0534, or by e-mail at erik.hilsinger@alaska.gov. Your timely response will greatly assist us in incorporating your concerns into project development. For that purpose, we respectfully request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Erik D Hilsinger

Erik Hilsinger

Cultural Resources Specialist, Central Region DOT&PF

Enclosures:

Figure 1: Encroachment

Figure 2: ROW Encroachment to Avoid ANC-00135 Wasilla Community Hall

Electronic cc w/ enclosures:

Chris Bentz, P.E., DOT&PF Central Region, Project Manager

Brian Elliott, DOT&PF Central Region, Regional Environmental Manager

Matt Dietrick, DOT&PF Statewide NEPA Manager

Holly McKinney, DOT&PF Statewide Cultural Resources Manager



U.S. Department
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**Federal Transit
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April 16, 2026

Bert Verrall
Chair
Matanuska-Susitna Borough, Historic Preservation Commission
350 East Dahlia Avenue
Palmer, Alaska 99645

**Subject: Alaska Railroad Corporation
Milepost 152.1 & 152.3 Bridge Replacement Project
National Historic Preservation Act, Section 106
Effects Determination Consultation**

Dear Mr. Verrall:

The Federal Transit Administration (FTA), in cooperation with Alaska Railroad Corporation (ARRC), is proposing the Milepost (MP) 152.1 & 152.3 Bridge Replacement Project (Project). The Project would replace the existing bridges located at MP 152.1 and 152.3 south of Wasilla, Alaska, to maintain the safety and reliability of the ARRC's rail operations. ARRC intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. Previous consultation had requested feedback on the proposed Area of Potential Effects (APE) and requested concurrence with proposed determinations of eligibility and a finding of no adverse effects for the undertaking. This letter requests your feedback on the proposed APE and with the proposed determinations of eligibility and a finding of adverse effect for the undertaking, and comments on a draft memorandum of agreement (MOA) for the project.

Project Location and APE

The project is located within the Matanuska-Susitna Borough between ARRC MP 151.85 and 152.43. This area falls within the Meridian, Township, Range S017N0001E, Sections 21-22. The 19.3-acre APE for the project encompasses all potential areas being considered for project activities, including project access points, staging areas, work pads, and the construction footprint. The APE is largely within the ARRC right-of-way and partially within the Palmer Hay Flats State Game Refuge, which is managed by the Alaska Department of Fish and Game. The APE is shown in Attachment A.

Project Activities

The Project activities would include the replacement of ARRC bridges at MP 152.1 and 152.3. To accommodate the new bridges, the track would be raised up to 11 inches above the existing track elevation throughout the 1,950-foot corridor (MP 151.85 to 153.43). The track embankment will be sloped and graded such that the increased elevation will meet at the existing toe of embankment, thereby preventing substantive fill beyond the existing footprint.

Access to the Project site would be via rail and an abandoned road that traverses parallel to the tracks. The access road would require temporary stream crossing at each location, which would be either culverts and fill within the channels, or temporary trestles. Specific means and methods for stream crossing construction will be determined by the contractor.

To support construction activities, two temporary staging areas/work pads will be constructed on geotextile mats between each railroad bridge and the abandoned access road. The work pads will measure approximately 50 feet by 100 feet in area. Clearing and grubbing within project limits will be required for access, staging, and work pad areas.

Identification of Historic Properties

In support of the Project, ARRC contracted Michael Baker International and ASRC Consulting & Environmental Services, LLC, to conduct a cultural resources field survey within the proposed APE. The results of these investigations are provided in Attachments B and C. In summary, three cultural resources were identified within the proposed APE:

- Alaska Railroad (ANC 03958): The U.S. government constructed the Alaska Railroad from Seward to Fairbanks between 1915 and 1923. The Alaska Railroad is potentially eligible for inclusion in the National Register of Historic Places (NRHP) as a historic district under Criterion A. See below for a discussion of potential adverse effects to the possible Alaska Railroad Historic District.
- ARRC MP 152.1 Bridge (ANC 02771): This 70 foot timber trestle over Spring Creek was originally built in 1916 during construction of the Alaska Railroad, with subsequent modifications and reconstructions. This resource is recommended as not individually eligible for listing on the NRHP.
- ARRC MP 152.3 Bridge (ANC-02772): This 28 foot timber trestle over an unnamed tributary of Spring Creek was originally built in 1916 during construction of the Alaska Railroad, with subsequent modifications and reconstructions. This resource is recommended as not individually eligible for listing on the NRHP.

The Alaska State Historic Preservation Office (SHPO) had previously recommended that consultation letters address any potential cumulative adverse effects to the Alaska Railroad Historic District, which may be eligible for listing on the NRHP. ARRC is actively working towards identifying contributing features to the Alaska Railroad Historic District with the intent of creating a Section 106 Programmatic Agreement (PA) for the management and maintenance of the Alaska Railroad as appropriate. In previous consultation, FTA had proposed to supplement the determinations of eligibility documentation in Attachments B and C with photographs and engineering drawings consistent with modified Historic American Engineering Record (HAER) Level II documentation. Upon coordination with the Advisory Council for Historic Preservation,

SHPO had been informed that this approach of addressing potential adverse effects would not be consistent with 36 CFR 800.

In place of the previously proposed HAER documentation mitigation, a draft MOA to resolve adverse effects to the potential Alaska Railroad Historic District is included for your review as Attachment D. Should you wish to remain informed on the project's progress as it pertains to the stipulations in the agreement, you are invited to become a concurring party to the final MOA.

Eligibility and Effect Determinations

Based on the aforementioned documentation, FTA has made the following determination:

- The APE for the Project as shown in Attachment A is sufficient to identify properties eligible for, or potentially eligible for, the NRHP and to determine the potential effects of project activities.
- ARRC MP 152.1 Bridge (ANC 02771) is determined individually **not eligible** for the NRHP.
- ARRC MP 152.3 Bridge (ANC-02772) is determined individually **not eligible** for the NRHP.
- The Project will have an **adverse effect** on the Alaska Railroad Historic District
- The stipulations and requirements contained in the attached MOA are sufficient to mitigate the adverse effects of the Project.

Pursuant to 36 CFR Part 800, FTA requests your feedback on the proposed APE and on the above determinations, comments on the draft MOA, and desire to sign the final MOA as a concurring party within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Barney Remington at Barney.Remington@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

(for) Susan K. Fletcher, P.E.
Regional Administrator

Attachment A *MP 152.1 and MP 152.3 Bridge Replacement APE and Site Locations*

Attachment B *Cultural Resources Identification Study and Findings, Alaska Railroad Corporation Bridge Project, Bridge 152.1 Matanuska-Susitna Borough, Alaska*

Attachment C *Cultural Resources Identification Study and Findings, Alaska Railroad Corporation Bridge Project, Bridge 152.3 Matanuska-Susitna Borough, Alaska*

Attachment D *DRAFT MEMORANDUM OF AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION, THE ALASKA STATE HISTORIC PRESERVATION OFFICER, AND THE ALASKA RAILROAD CORPORATION*

*REGARDING THE ALASKA RAILROAD CORPORATION MILEPOST 152.1
AND 152.3 BRIDGE REPLACEMENTS, WASILLA, ALASKA*



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities

OFFICE OF THE COMMISSIONER
Ryan Anderson, P.E., Commissioner
PO Box 112500
Juneau, Alaska 99811-2500
Main: 907.465.3900
dot.alaska.gov

Dear Interested Parties,

April 23, 2026

The Alaska Department of Transportation and Public Facilities (DOT&PF) is providing notice of a public review period for the Draft Programmatic Agreement (PA) for the West Susitna Access Road Project.

The Draft PA has been developed in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations under 36 CFR Part 800, and outlines the process by which DOT&PF, in coordination with consulting parties, will identify, evaluate, and resolve potential effects to historic properties associated with the project.

The public comment period begins April 23, 2026, and will close May 23, 2026. Pursuant to 36 CFR 800.2(d), DOT&PF invites members of the public and interested organizations to review the Draft PA and provide comments during this time.

The Public Draft Programmatic Agreement is available for review on the project website at publicinput.com/westsusitnapublicpa. Comments may be submitted online through the same website or by email at dot.WestSu@alaska.gov.

This public review is being conducted in coordination with, but is separate from, ongoing government-to-government consultation with Tribal entities under Section 106. Tribal draft PA review began in March with coordination continuing as needed. Tribal consultation remains a distinct process and is not replaced by public comment.

The Draft PA establishes a framework for phased identification, evaluation, and treatment of historic properties as project design and construction progress. It also outlines procedures for consultation, monitoring, inadvertent discoveries, and ongoing reporting.

If you have questions or require additional information, please contact the project team at dot.WestSu@alaska.gov. For more information visit <https://dot.alaska.gov/westsusitnaaccess/>

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Anderson".

Ryan Anderson, P.E.
Commissioner
Alaska Department of Transportation & Public Facilities

DRAFT FOR PUBLIC REVIEW

PROGRAMMATIC AGREEMENT

AMONG THE ALASKA DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES, KNIK TRIBE, AND THE ALASKA STATE
HISTORIC PRESERVATION OFFICE
REGARDING THE WEST SUSITNA ACCESS PROJECT

STATE PROJECT NUMBER CFHWY01209

FEDERAL PROJECT NUMBER 0001795

MATANUSKA-SUSITNA BOROUGH, ALASKA

EXECUTED THE (DAY) OF (MONTH), 2026

DRAFT FOR PUBLIC REVIEW

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39 activities. As a government partner to the Project, with independent federal-aid duties and
40 responsibilities, DOT&PF invited the Knik Tribe to sign as an invited signatory.

41 **WHEREAS**, the FHWA retains the responsibility for Government-to-Government Consultation
42 with Federally Recognized Tribes; and

43 **WHEREAS**, the DOT&PF, in consultation with the State Historic Preservation Office (“SHPO”),
44 has determined that Section 106 of the NHPA will be best addressed through the development of
45 this Programmatic Agreement (“PA”) in accordance with 36 CFR 800.14(b)(3) because it is a
46 complex undertaking for which effects on historic properties cannot be fully determined prior to
47 Project approval, and the Project may be constructed in phases that may overlap with multiple
48 concurrent actions in multiple locations; and

49 **WHEREAS**, the DOT&PF will implement phased identification in accordance with 36 CFR
50 800.5(a)(3) and evaluation in accordance with 36 CFR 800.4(b)(2), will prioritize avoiding and
51 minimizing adverse effects to historic properties consistent with 36 CFR 800.6(a), and has drafted
52 this agreement in accordance with 36 CFR 800.14(b)(3) to facilitate these steps; and

53 **WHEREAS**, the Area of Potential Effects (“APE”) for the Project is centered on and encompasses
54 the proposed 300-foot right-of-way (“ROW”; includes the construction footprint), material
55 sources, and other areas of proposed ground disturbance, as well as a broader geographic area
56 within which the Project may directly or indirectly affect historic properties, described in detail in
57 Appendix A, *Area of Potential Effects*; and

58 **WHEREAS**, to inform identification of historic properties and aid assessing effects, the DOT&PF
59 has identified an area within the APE—the construction footprint—that encompasses Project-
60 related ground disturbance during construction to include a 50-foot buffer beyond vegetation
61 clearance areas; and

62 **WHEREAS**, the DOT&PF will continue to gather environmental data, conduct historic property
63 identification efforts, and refine Project design after execution of the PA; and the number of
64 historic properties affected by the Project may change throughout the PA’s duration; and

65 **WHEREAS**, the DOT&PF initiated Section 106 consultation (“consultation”) on the Project with
66 Section 106 consulting parties (“Consulting Parties”) as defined in 36 CFR 800.2(c) in a letter
67 dated August 7, 2024, and has been conducting ongoing consultation with Consulting Parties
68 (Appendix K, *Consulting Parties*); and

69 **WHEREAS**, as defined in 36 CFR 800.16(m), “Indian tribe” means an Indian tribe, band, nation,
70 or other organized group or community, including an Alaska Native village, regional corporation,
71 or village corporation, as those terms are defined in Section 3 of the Alaska Native Claims
72 Settlement Act (“ANCSA”; 43 U.S.C. 1602) and are “recognized as eligible for special programs
73 and services provided by the United States to Indians because of their status as Indians”; and

74 **WHEREAS**, the DOT&PF initiated consultation on August 7, 2024, and will continue to notify
75 and coordinate with Tribal entities including the Federally Recognized Tribes of Native Village of
76 Tyonek, Native Village of Eklutna, Knik Tribe, Chickaloon Village Traditional Council, Kenaitze

77 Tribe, and ANCSA corporations, including Cook Inlet Region, Inc. (“CIRI”); Chickaloon Moose
78 Creek Native Association (“CMCNA”); Eklutna, Inc.; Knikatnu, Inc.; and Tyonek Native
79 Corporation; and Alexander Creek Incorporated (collectively, “Tribal entities”);

80 **WHEREAS**, the DOT&PF is seeking input from Tribal entities concerning properties of
81 traditional religious and cultural significance to the Tribes to fulfill consultation requirements
82 pursuant to 36 CFR 800.2(c)(2)(ii) as it relates to sites of traditional religious and cultural
83 importance; and

84 **WHEREAS**, Tyonek Native Corporation represents shareholders with profound cultural,
85 historical, and spiritual ties to the lands within the APE directly impacted by the road, and is
86 dedicated to protecting and mitigating impacts on cultural and archaeological resources through
87 effective program management in collaboration with Signatories, Concurring Parties, Tribal
88 entities, and other Consulting Parties; and

89 **WHEREAS**, Eklutna, Inc., an Alaska Native corporation, owns and operates one of the largest
90 aggregate facilities in the Anchorage region, supplying both alluvial gravel and hard rock, and is
91 uniquely positioned to provide cost-competitive, high-quality materials and consulting services to
92 the DOT&PF; and consistent with the FHWA’s recognition of Alaska Native corporations as
93 eligible partners under federal law, including the Indian Self-Determination and Education
94 Assistance Act definition of “tribal organization,” the DOT&PF may, consistent with applicable
95 procurement requirements, engage Eklutna, Inc. under established federal frameworks to support
96 Project planning, material sourcing, and potential partnerships, thereby advancing Project delivery
97 and strengthening collaboration with Alaska Native communities; and

98 **WHEREAS**, the Project is located on SOA lands administered in part by the Alaska Department
99 of Natural Resources (“DNR”); and to address its obligations under Alaska Statute (“AS”) 41.35,
100 DNR has participated in the development of and is an Invited Signatory to this PA; and

101 **WHEREAS**, to complete the Project, the DOT&PF is seeking an authorization from the United
102 States Army Corps of Engineers (“USACE”) under Section 404 of the Clean Water Act and
103 Section 10 of the Rivers and Harbors Act of 1899; and

104 **WHEREAS**, the DOT&PF invited the Bureau of Land Management (“BLM”); USACE; FHWA;
105 MSB; Native Village of Tyonek; Native Village of Eklutna; Chickaloon Village Traditional
106 Council; Kenaitze Tribe; Alexander Creek Inc.; CIRI; CMCNA; Eklutna, Inc.; Knikatnu, Inc.;
107 Tyonek Native Corporation; and the Iditarod Historic Trail Alliance (“IHTA”) to be Concurring
108 Parties to this PA; and

109 **WHEREAS**, consultation on this undertaking has occurred since initiation on August 7, 2024, and
110 the Consulting Parties designated a primary and alternate representative for participation in
111 monthly consultation meetings, with some representatives participating in weekly subgroup
112 consultation meetings to refine this PA document; and

113 **WHEREAS**, the DOT&PF will develop a *Historic Properties Treatment Plan* (“Treatment Plan”;
114 Appendix D, *Treatment Plan*) in consultation with the Consulting Parties for this PA to resolve

115 adverse effects to historic properties and will amend the Treatment Plan as needed, including when
116 new data is available; and

117 **WHEREAS**, in consultation with Tribal entities, the Treatment Plan may also address and resolve
118 adverse effects to sites of traditional religious and cultural significance to Tribes (36 CFR 800.6);
119 and

120 **WHEREAS**, the Project will affect the Iditarod National Historic Trail (“INHT”), a 2,400-mile
121 system designated by the United States Congress in 1978 under the National Trails System Act of
122 1968 and administered by the BLM, which includes Congressionally designated routes, historic
123 trails, and sites recorded in the Alaska Heritage Resource Survey (“AHRs”), and connecting and
124 recreational trails still used today; and the BLM, as Trail Administrator, has participated as a
125 Consulting Party and agreed to be a Concurring Party to this PA; and the Project may affect SOA-
126 managed segments under the 1986 Interagency Comprehensive Management Plan and may add
127 direct, indirect and cumulative effects to the least impacted segments of the southern portion of
128 the INHT from Seward to Skwentna; and

129 **WHEREAS**, the DOT&PF has invited the IHTA to consult on the potential for Project effects
130 upon the INHT and has invited IHTA to be a Concurring Party to this PA; and

131 **WHEREAS**, initial, limited identification activities were carried out by HDR Alaska, Inc. in 2024;
132 and did not include input from all Tribal entities regarding research design, field methods, and
133 significance of identified resources, necessitating a phased approach to identification and
134 evaluation of possible historic properties; and

135 **WHEREAS**, the DOT&PF will seek input from Signatories and Consulting Parties regarding
136 methods and/or research design for future identification and evaluation, monitoring,
137 documentation, and mitigation of archaeological, historical, and ethnographic resources, which
138 may include properties of traditional, religious, and/or cultural significance to the Tribal entities;
139 and

140 **WHEREAS**, the DOT&PF will coordinate with Signatories and Consulting Parties regarding
141 participation and level of involvement in future field survey, reporting, Tribal and other
142 archaeological monitoring, documentation, and other activities in accordance with their ability and
143 desire to do so; and

144 **WHEREAS**, in accordance with 36 CFR 800.6(a)(1), on November 19, 2024, the DOT&PF
145 invited the Advisory Council on Historic Preservation (“ACHP”) to participate in consultation and
146 development of this PA; and

147 **WHEREAS**, the ACHP provided technical assistance during development of this PA, but has not
148 elected to participate in consultation as a Signatory to the PA (36 CFR 800.6(a)(1)) but retains the
149 authority to enter consultation in the future; and

150 **NOW, THEREFORE**, the DOT&PF, SHPO, and Knik Tribe (collectively “Signatories”) agree
151 that the undertaking will be implemented in accordance with the following stipulations in order to
152 take into account the effect of the undertaking on historic properties.

STIPULATIONS

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The DOT&PF will ensure that the following stipulations are implemented:

I. Roles and Responsibilities

A. Alaska Department of Transportation and Public Facilities (“DOT&PF”)

1. The DOT&PF has a statutory obligation to fulfill the requirements of Section 106 of the NHPA and has the authority to enforce the terms and conditions of this PA. The DOT&PF is responsible for implementing the stipulations of this PA, including carrying out consultation; providing oversight for Tribal monitoring; reporting; and implementing avoidance, minimization, and mitigation measures documented in this PA and/or Treatment Plan (Appendix D).
2. The DOT&PF will ensure that this PA and all its requirements will be binding on any contractors acting on behalf of the DOT&PF, including any successors, assigns, joint ventures, or subcontractors.

B. State Historic Preservation Officer (“SHPO”)

1. Under the terms of this PA, the SHPO and their staff will advise and assist the DOT&PF in carrying out its responsibilities, including the reviews of plans, reports, and other deliverables as called for under this PA and/or Treatment Plan (Appendix D).

C. Knik Tribe

1. Knik Tribe is a Primary Signatory to this PA and a government partner under 23 U.S.C. § 202(a)(9), with independent federal-aid duties and responsibilities related to Project planning, funding, and delivery. In this capacity, Knik Tribe will perform such activities and have such rights and authorities under this PA, the Memorandum of Agreement between DOT&PF and the Knik Tribe dated April 8, 2025 and any agreements between DOT&PF and the Knik Tribe related to the Project.
2. The Knik Tribe will participate as a Project Partner in consultation on Project phasing, scheduling, and implementation decisions that may affect historic properties.
3. The Knik Tribe will review and comment on identification, evaluation, assessment of effects, and treatment measures in its capacity as both a Primary Signatory and Project Partner.
4. The Knik Tribe will coordinate with DOT&PF regarding archaeological and Tribal monitoring, cultural resources identification and evaluation, and treatment of cultural resources, including sites of traditional religious and cultural significance.

- 190 5. The Knik Tribe will retain its independent authority to carry out eligible federal-
191 aid activities under its FHWA Tribal Transportation Program Agreement.
192 6. The Knik Tribe will participate in this PA without waiving, diminishing, or
193 transferring its sovereign authorities or project-partner responsibilities.

194 D. Alaska Department of Natural Resources (“DNR”)

- 195 1. The Office of History and Archaeology (“OHA”) assists the DNR in
196 implementing the Alaska Historic Preservation Act and other relevant SOA
197 statutes.
198 a. Under the terms of this PA and to maximize regulatory efficiency, the OHA
199 will not require duplicate documentation and correspondence to
200 demonstrate compliance with AS 41.35.070 if the substantive components
201 of AS 41.35.070 are addressed in the documentation produced pursuant to
202 36 CFR 800.
203 b. Under the terms of this PA, the OHA will review applications for State
204 Cultural Resource Investigation Permits (“SCRIPs”), and update the AHRS
205 following receipt of site cards and reports produced in support of the
206 undertaking.
207 2. The Division of Mining, Land, and Water (“DMLW”), on behalf of DNR,
208 issues permits and authorizations for activities on general SOA lands. To
209 comply with AS 41.35.070, the DMLW will attach this PA or its stipulations to
210 any agency-specific permits or authorizations for the Project. As needed, the
211 DMLW will consult with the OHA regarding any other actions needed to
212 comply with AS 41.35.070.

213 E. Federal Highway Administration (“FHWA”)

- 214 1. The FHWA will engage in Government-to-Government Consultation,
215 consistent with E.O. 13175, upon the written request of a Tribe that is located
216 in proximity to the permitted route or that has identified ancestral, cultural, or
217 historical interests in the APE.
218 2. The FHWA will use DOT Order 5301.1A as a guideline for Government-to-
219 Government Consultation, where appropriate, and consistent with such limited
220 applicability under NHPA and NEPA, other similar Federal laws or with respect
221 to one-on-one project-level consultations as recognized in DOT Order 5301.1A
222 ¶7.b.

223 F. Bureau of Land Management (“BLM”)

- 224 1. The BLM will review applications on its lands for Permits for Archaeological
225 Investigations under the Archaeological Resources Protection Act (“ARPA”)
226 and/or the Antiquities Act of 1906 and other authorities, as appropriate, and
227 ensure compliance with those permits.

228 2. The BLM, as Administrator for the INHT, will consult with and advise the
229 Signatories regarding identification, evaluation, assessment, and mitigation of
230 effects to the INHT system and associated sites.

231 G. Tribal Entities

232 1. The participating Tribal entities will select representation in the field should
233 Tribal monitoring or other coordination be needed.

234 2. Tribal entities may participate in and contribute to the analysis of information
235 gathered under the terms of this PA.

236 3. Tribal entities will notify the DOT&PF of any sensitive information that may
237 need to be kept restricted consistent with Stipulation II.B.7 to assist with
238 respectful data management.

239 4. Nothing in this PA mandates that Tribal entities participate in Project activities
240 or contribute information.

241 5. Participation as a Consulting Party for this PA does not constitute an
242 endorsement of the Project.

243 II. Standards

244 A. Professional Qualification Standards

245 1. All cultural resource investigations, documentation, and associated activities
246 required by this PA will be conducted and prepared by or under the direct
247 supervision of a qualified individual(s) meeting the Secretary of the Interior’s
248 (“SOI’s”) Professional Qualification Standards for Archaeology and/or History
249 (36 CFR 61; Appendix A, *Area of Potential Effects*). SOI-qualified individuals
250 who are employed by the DOT&PF are referred to as Professionally Qualified
251 Individuals (“PQIs”) in this PA.

252 2. Tribal entities possess special expertise and traditional knowledge. As such,
253 SOI Professional Qualification Standards do not apply to Tribal entities
254 identified as Consulting or Concurring Parties in this PA.

255 B. Documentation and Reporting Standards

256 1. These standards will apply to all measures stipulated in this PA.

257 2. National Register of Historic Places (“NRHP”) evaluations and any formal
258 NRHP nominations to the National Park Service (“NPS”) will follow the SOI’s
259 Standards and Guidelines for Evaluation of Historic Properties (36 CFR 63 and
260 36 CFR 800.4(c)) and NPS Bulletin 16a *How to Complete the National Register*
261 *Registration Form*, respectively.

262 3. All historic property documentation, including field documentation, site
263 evaluation, identification and evaluation reports, data recovery reports,
264 archaeological monitoring reports, the Treatment Plan, and any other associated
265 documentation, will conform to the standards outlined in 36 CFR 800.11 and

- 266 will be consistent with the SOI’s Standards and Guidelines for Archaeology and
267 Historic Preservation (48 *Federal Register* [“FR”] 44716) and the SOI’s
268 Standards and Guidelines for Archaeological Documentation (48 FR 44734–
269 44737), and will also meet current professional SOA standards, such as OHA’s
270 Cultural Resources Investigations: Phase Organization [*Historic Preservation*
271 *Series #11* (2023)].
- 272 4. Tribal entities possess special expertise and traditional knowledge, and are
273 invited to participate in and contribute to the identification, documentation, and
274 reporting of historic properties, including but not limited to properties of
275 religious, spiritual, or cultural significance to Tribes.
 - 276 5. The DOT&PF will ensure that any persons conducting or supervising cultural
277 resources work on its behalf hold all appropriate federal or state permits and/or
278 authorizations for that work.
 - 279 6. The DOT&PF will ensure that ethnographic research and documentation is
280 completed using collaborative standards with an ethnographer that is selected
281 in coordination with Tribal entities and Consulting Parties.
 - 282 7. The Signatories recognize that certain information about historic properties or
283 archaeological resources are protected from public disclosure under the NHPA
284 (54 U.S.C. 307103), ARPA (43 CFR 7.18), and Alaska State law, as required
285 by Public Law 96-95, AS 40.25.120(a)(4), and Policy and Procedure No.
286 50200. Parties to this PA will ensure that all actions and documentation
287 prescribed by this PA are consistent with the non-disclosure requirements of
288 these laws.
 - 289 8. The DOT&PF, and any contractors hired on its behalf, will not retain sensitive
290 information that Tribes or Consulting Parties authorize them to collect, except
291 as required for compliance with the terms of this PA and Treatment Plan
292 (Appendix D). Sensitive information includes information covered under
293 Section 304 of the NHPA (54 U.S.C. 307103), ARPA (43 CFR 7.18), or
294 AS 40.25.120(a)(4).

295 III. Consultation

296 A. Documentation and Appendix Review

- 297 1.
 - 298 a. The stipulations of this PA are and will be guided by documents developed
299 in consultation with Signatories and Consulting Parties. Many of these
300 documents will be incorporated into the PA under designated appendices,
301 and all guidance will be revised as additional information becomes
302 available, including Project design. At the time of this PA’s execution,
303 Appendices A, J, and K are considered complete. The DOT&PF will ensure
304 that the remaining appendices are developed in consultation with
305 Signatories and Consulting Parties. The final appendices will be

306 incorporated into this PA only upon written concurrence of all Signatories.
307 The DOT&PF will facilitate monthly consultation meetings among
308 Signatories and Consulting Parties to discuss this PA’s progress, and to draft
309 and/or finalize the remaining appendices either via phone or in-person, or
310 as determined necessary.

311 b. The DOT&PF will provide Signatories and Consulting Parties with
312 revisions to the noted appendices at least 15 working days prior to any
313 meetings. The DOT&PF will incorporate comments received as
314 appropriate, and will provide updated drafts to Signatories and Consulting
315 Parties. The first and last reviews will be 30-day periods.

316 B. Government-to-Government Consultation

317 1. The FHWA engages in Government-to-Government Consultation with Tribal
318 entities, pursuant to E.O. 13175 and DOT Order 5301.1A. However, DOT
319 Order 5301.1A has limited applicability for NHPA and NEPA project-level
320 consultations pursuant to ¶7.b thereof. Federally Recognized Tribes and other
321 Tribal entities may request Government-to-Government Consultation with any
322 federal agency at any time pursuant to E.O. 13175 and the agency’s rules.

323 C. Tribal Coordination

- 324 1. The DOT&PF will coordinate with Tribal entities, and will provide information
325 about the Project and implementation of this PA.
- 326 2. The DOT&PF may execute separate agreements with one or more Tribal
327 entities to define how to implement meaningful and respectful consultation to
328 improve coordination. Such an agreement in no way supplants or prohibits a
329 Tribal entity’s authority or right to seek Government-to-Government
330 Consultation with FHWA or any other federal agency.
- 331 3. The DOT&PF will communicate with Tribal entities regularly or at a minimum
332 at the Annual Project Update Meeting (Stipulation X.C) to share information.
333 This includes, but is not limited to, information relevant to the cultural resource
334 sensitivity training curriculum, information relevant to inventory and
335 evaluation efforts, requests to participate in monitoring activities, and requests
336 to accompany crews in the field.
- 337 4. The DOT&PF will ensure the Tribal entities receive all technical reports unless
338 there is sensitive content. In these instances, the DOT&PF will ensure the
339 distribution of data complies with Stipulation II.B.7.

340 D. Public Engagement

341 1. The DOT&PF will consult the public, at a minimum, as part of the annual
342 reporting process (Stipulation X.B). The DOT&PF will mention the availability
343 of the annual report in newsletters or similar forms of communication that are
344 sent to the public and other interested parties.

345 2. Members of the public may bring objections or concerns to any of the
346 Signatories, who may then use the objections process outlined in Stipulation XI.
347 The DOT&PF will provide the objecting party with a response to their
348 concern(s) within 90 days of receipt of the objection in writing.

349 E. Section 106 Consultation

- 350 1. The DOT&PF will use the SOI’s Standards and Guidelines for Federal Agency
351 Preservation Programs as a guide for consultation, the DOT&PF’s
352 *Environmental Procedures Manual*, and additional guidance as appropriate.
353 Consultation means the process of seeking, discussing, and considering the
354 views of other participants, and, when feasible, seeking agreement with them
355 regarding matters arising in the Section 106 process.
- 356 2. The DOT&PF will ensure the SHPO and OHA receive all technical reports in
357 keeping with the SHPO’s mission to identify and maintain inventories of
358 cultural resources and historic properties per Section 101 of NHPA (54 U.S.C.
359 302301) and AS 41.35.070. The SHPO will retain location information about
360 all cultural resources and historic properties, including properties of religious,
361 spiritual, or cultural significance to Tribes; however, at the request of one or
362 more Tribal entities, the SHPO will treat information regarding specific historic
363 properties of traditional religious, spiritual, or cultural significance as sensitive
364 information subject to Section 304 of the NHPA, 36 CFR 800.11(c), and/or
365 applicable state laws.
- 366 3. The DOT&PF will communicate with Consulting Parties regularly or at a
367 minimum at the Annual Project Update Meeting (X.C) to share information.
368 This includes, but is not limited to, information relevant to the cultural resource
369 sensitivity training curriculum, information relevant to inventory and
370 evaluation efforts, requests to participate in monitoring activities, and requests
371 to accompany crews in the field.
- 372 4. The DOT&PF will ensure the Consulting Parties receive all technical reports
373 unless there is sensitive content. In these instances, the DOT&PF will ensure
374 the distribution of data complies with Stipulation II.B.7.
- 375 5. The DOT&PF will ensure that the Consulting Parties are kept informed on the
376 undertaking and implementation of this PA, and will provide opportunities for
377 review and comment on all pertinent documents unless there is sensitive
378 content. In these instances, the DOT&PF will ensure the distribution of data
379 complies with Stipulation II.B.7. Consultation will, at a minimum, include
380 distribution of the Annual PA Report (Stipulation X.A) to Consulting Parties
381 via email and facilitation of the Annual Project Update Meeting
382 (Stipulation X.C).
- 383 6. Draft documents, unless otherwise noted in this PA, will have a minimum 30-
384 day review and comment period from Consulting Parties unless the request for

385 comment is governed by Appendix F, *Treatment of Human Remains* and/or
386 Appendix G, *Discovery Plan*.

387 7. Consulting Parties may request additional time to review documents and
388 deliverables consistent with Stipulation XII.B.1.

389 8. The DOT&PF will communicate with and provide information to the public
390 pursuant to 36 CFR 800.2(d). The DOT&PF will post the Annual PA Report
391 (Stipulation X.A), with confidential information redacted as necessary, on the
392 Project website.

393 IV. Identification and Evaluation

394 A. Identification

395 1. To satisfy requirements established in accordance with 36 CFR 800.11(e), the
396 DOT&PF will complete the following cultural resources surveys within the
397 APE with the understanding that these investigations will likely have overlap
398 and any identified cultural resources could have multiple types of significance
399 or extend across the categories described below. All research conducted as part
400 of this PA will be documented in professional, technical reports and made
401 available for review by Consulting Parties for no less than 30 days following
402 receipt.

403 B. Archaeological Investigation

404 1. It is not feasible for the Project to complete intensive pedestrian survey for the
405 entirety of the APE. As such, the DOT&PF will use a sampling strategy and
406 scale the intensity of research by likelihood of project effects (Appendix D,
407 *Treatment Plan*).

408 2. The DOT&PF will ensure that archaeological fieldwork is documented and
409 summarized annually in a professional report.

410 c. The DOT&PF will share a draft annual fieldwork report with Signatories
411 and Consulting Parties for comment to coincide with the Annual PA Report.
412 The comment period will be in accordance with the 30-day annual reporting
413 review time frames, but if the document exceeds 100 pages, then the
414 DOT&PF will extend the minimum comment period to 60 days.

415 a. The DOT&PF will take timely comments received into consideration and
416 will distribute a final report within 90 days of the end of the comment
417 period.

418 C. Ethnographic Research and Documentation

419 1. The DOT&PF will develop a data gap analysis to consolidate and analyze
420 currently available information in written literature, archives, and oral histories.
421 The document will include recommendations about additional data gathering.

- 422 2. Upon completion of a draft data gap analysis, the DOT&PF will distribute the
423 draft for a 60-day review and comment period to Signatories and Consulting
424 Parties. The DOT&PF will respond to timely comments received and, if needed,
425 distribute a revised version to Signatories and Consulting Parties no later than
426 30 days following the end of the comment period.
- 427 3. The DOT&PF will make a determination on whether additional research is
428 needed to identify historic properties as part of the reasonable, good-faith effort
429 before distributing the revised data gap analysis.
- 430 4. If the DOT&PF proposes to pursue additional identification, then it will draft a
431 research design in consultation with the Signatories and Consulting Parties.
- 432 a. The DOT&PF will consult with Tribal entities regarding what Project
433 activities may proceed prior to completion of additional ethnographic
434 research and will distribute a proposed timeline for phased identification for
435 a 30-day review and comment period.
- 436 b. Upon completion of a draft research design, the DOT&PF will distribute
437 the document for a 60-day review and comment period to Signatories and
438 Consulting Parties. The DOT&PF will respond to timely comments
439 received and, if needed, distribute a revised version to Signatories and
440 Consulting Parties no later than 30 days following the end of the comment
441 period.
- 442 c. The research design will include the scope of effort, what types of
443 information will be gathered, the selection process for an ethnographer or
444 other researcher, a process to collaborate and include Tribal entities in the
445 effort, and a reporting process. The research design will lay out a process to
446 handle sensitive information.
- 447 d. The primary investigator will ensure that reports or deliverables will be
448 reviewed first by the respective Tribal entities for accuracy and to identify
449 any information that may need to have restricted distribution. Following
450 review by Signatories and Consulting Parties, the DOT&PF will review and
451 request concurrence from the SHPO regarding any determination or
452 eligibility (“DOE”) and treatment measures, if needed.

453 D. Historic/Built Environment

- 454 a. The DOT&PF will ensure that a SOI-qualified professional documents any
455 standing buildings and structures located within the ROW. This effort will
456 likely occur concurrently with archaeological investigations and any results
457 may be combined with another technical report for efficiency and if
458 appropriate.

459 E. Historic Trails

- 460 a. The DOT&PF will ensure all trail segments that cross or intersect the ROW
461 are surveyed and documented at least 0.25 mile beyond the ROW to

- 462 evaluate the integrity of the resources and the potential for both physical
463 and visual adverse effects. This effort will likely occur concurrently with
464 archaeological investigations, and any results may be combined with
465 another technical report for efficiency, if appropriate.
- 466 b. The DOT&PF will ensure that evaluation of any sites or trail segments
467 related to the Iditarod Dog Sledding Historic District Vernacular Landscape
468 (ANC-03326, TYO-00023) use the NRHP multiple property listing as the
469 guide to evaluate the resources’ significance and assess effects.
- 470 c. As applicable, the DOT&PF will ensure that DOEs for historic trails
471 consider significance and association with Alaska Native use, before and
472 after the INHT’s period of significance, as well as other themes and
473 associations.
- 474 d. The DOT&PF will ensure that evaluation of significance and finding of
475 effect for the INHT system consider both standard Section 106
476 considerations as well as significance and impacts under the National Trail
477 Systems Act.

478 F. Phasing

- 479 1. The DOT&PF intends to phase construction and will ensure that sufficient
480 information has been gathered in advance to avoid, minimize, or mitigate
481 adverse effects to historic properties prior to carrying out activities that have
482 potential to cause adverse effects.
- 483 a. The DOT&PF will follow the process laid out by 36 CFR 800.4(c) to
484 determine whether a property is eligible for the NRHP.
- 485 b. As practicable, the DOT&PF will seek comments from the Signatories and
486 Consulting Parties and concurrence on DOEs from SHPO as part of the
487 review process for reports and other documentation produced during the
488 implementation of Stipulation IV.A.
- 489 c. The DOT&PF can request NRHP review outside of the annual reporting
490 cycle to facilitate Project implementation provided that documentation is
491 consistent with 36 CFR 800.11.

492 V. Assessment of Effects

493 A. Phased Assessment

- 494 1. The DOT&PF will consult with Signatories and Consulting Parties regarding
495 measures to avoid, minimize, and/or mitigate adverse effects to historic
496 properties during Project pre-design through the end of construction consistent
497 with 36 CFR 800.4 and 800.5.
- 498 2. The DOT&PF will iteratively assess effects at least annually as part of the
499 Annual PA Reporting and Review process (Stipulation X) to reflect the current

500 understanding of the Project’s design, the level and extent of historic properties
501 inventory, and the Project’s effects to known historic properties.

- 502 a. For efficiency, the DOT&PF may request comment from Signatories and
503 Consulting Parties on assessment of effects for no less than a 30-day review
504 and comment period. The DOT&PF will extend the minimum comment
505 period to 60 days when the documentation, including any referenced
506 reports, exceeds 100 pages.
- 507 b. The DOT&PF can request review of finding of effects outside the annual
508 reporting cycle to facilitate project implementation.

509 B. Long-term Considerations

- 510 1. After the initial inventory is completed, the Signatories may determine that
511 additional identification and/or treatment measures are needed to understand
512 and/or account for broad-scale indirect or cumulative adverse effects to local,
513 State, or national history and prehistory.
- 514 2. The DOT&PF will consult with the Signatories and Consulting Parties during
515 the Annual Meeting (Stipulation X.C) to determine if broad-scale mitigation is
516 appropriate, and if so, to identify measures to implement. The Signatories and
517 Consulting Parties will also consider the Project’s indirect and cumulative
518 effects in advance of the Project transitioning from construction to maintenance
519 and operation.
- 520 3. The DOT&PF reserves the right to re-evaluate the assessment of effects to
521 historic properties if changes in design, construction methods, and/or
522 maintenance occur.

523 VI. Treatment Measures

524 A. Design Review

- 525 1. The DOT&PF will seek to avoid and minimize effects to historic properties
526 during design, wherever possible, through design adjustments, including but
527 not limited to narrowing the roadway embankments, steepening side slopes,
528 making minor alignment shifts, using vegetation screening, and making other
529 adjustments, recognizing that DOT&PF’s responsibilities also include
530 protecting and minimizing impacts on other resources (e.g., wetlands,
531 recreational resources, the INHT) as well as providing a safe highway design.
- 532 2. The DOT&PF acknowledges that design changes may require additional
533 identification, evaluation, and assessment of effect efforts.
- 534 3. Following review by a PQI, the DOT&PF will share the design of each phase
535 or segment of the undertaking with the Signatories and Consulting Parties for a
536 30-day review period to confirm there is no new information and no additional
537 measures will be needed to avoid, minimize, or mitigate adverse effects to
538 historic properties consistent with 36 CFR 800.5.

- 539 4. The DOT&PF will consult with Signatories and Consulting Parties on design
540 changes if areas have not received sufficient identification as defined in
541 Stipulation V.A.1, a historic property will have an increased or altered effect,
542 and/or a treatment measure is changed. The DOT&PF will report
543 recommendations on identification, evaluation, and assessment of effects in
544 accordance with Stipulation X.
- 545 5. In consultation with the Signatories, and per Appendix C, *Monitoring Plan*, the
546 DOT&PF will delineate cultural resources and historic properties within the
547 APE as “environmentally sensitive” areas in the field and on Project plans, and
548 will insert language that specifies construction access restrictions into contract
549 documents.
- 550 6. The DOT&PF will negotiate the Project’s construction contract to include
551 specific reference to Stipulation VI.A.

552 B. Avoidance and Minimization

- 553 1. If the DOT&PF elects to avoid cultural resources that have not been fully
554 evaluated and reviewed by Signatories and Consulting Parties, the DOT&PF
555 may treat them as eligible and propose an interim site boundary. The DOT&PF
556 will seek comment from the Signatories and Consulting Parties consistent with
557 Stipulation V.A.1.
- 558 a. If an unevaluated cultural resource cannot be avoided, then the DOT&PF
559 will evaluate the resource for NRHP eligibility, which may require
560 gathering additional information.
- 561 2. If a historic property cannot be avoided, then the DOT&PF will propose
562 minimization and/or mitigation measures with their assessment of effect and
563 seek comment from the Signatories and Consulting Parties. The Signatories and
564 Consulting Parties will have 30 days following receipt of these measures to
565 provide comments to DOT&PF.
- 566 a. The DOT&PF may proceed if no comments were received and the proposed
567 measures were included in the Treatment Plan (Stipulation VI.C).
- 568 3. The DOT&PF will draft a property-specific plan to resolve adverse effects to a
569 historic property if: (1) the Treatment Plan has not been finalized; (2) the
570 property type does not have a standard treatment measure defined in the
571 Treatment Plan; or (3) a Signatory or Consulting Party objects. A property-
572 specific mitigation plan will be approved by the SHPO.

573 C. Treatment of Historic Properties

- 574 1. The DOT&PF will draft and implement a Treatment Plan, in consultation with
575 the Signatories and Consulting Parties, to facilitate agile decision-making
576 during design and construction. The Treatment Plan will contain:
- 577 a. Procedures to facilitate avoiding sites within the ROW, including flagging
578 by a cultural resource professional or Tribal representative, periodic site

- 579 condition assessments, and monitoring by archaeologists and Tribal
580 representatives;
- 581 b. Minimization measures for historic trail crossings (see Appendix D,
582 *Treatment Plan* for detailed measures);
- 583 c. Standard mitigation measures for common property types, including
584 locations such as Susitna Station, and expected routine discoveries such as
585 culturally modified trees, cultural landscapes, and fire-cracked rock; and
- 586 d. Reporting on implementation of the plan and treatment measures.
- 587 2. The DOT&PF will consult the Signatories and Consulting Parties about
588 potential treatment measures:
- 589 a. The DOT&PF will share a draft Treatment Plan no later than 1 year after
590 PA execution.
- 591 b. The Signatories and Consulting Parties will have at least 30 days following
592 receipt of the Treatment Plan to comment on its first draft.
- 593 c. The DOT&PF will take timely comments received into consideration and
594 will distribute a revised version for a 30-day review period.
- 595 d. If no comments are received, then the DOT&PF will seek the SHPO’s
596 concurrence on the Treatment Plan consistent with 36 CFR 800.6(c)(1).
- 597 e. Following concurrence from the SHPO, the DOT&PF will append the
598 Treatment Plan to this PA as Appendix D, *Treatment Plan*.
- 599 3. The DOT&PF will consult the Signatories and Consulting Parties on proposed
600 revisions to the Treatment Plan at least annually.
- 601 a. The DOT&PF will seek review and comment from the Signatories and
602 Consulting Parties, for a period of no less than 30 days, regarding changes
603 to proposed measures to avoid, minimize, or mitigate adverse effects within
604 the Treatment Plan. Revisions to the Treatment Plan will be adopted
605 following the process found at Stipulation VI.C.2.
- 606 b. The DOT&PF may incorporate approved property specific plans into the
607 Treatment Plan without going through the revision process found at
608 Stipulation VI.C.2.

609 D. Treatment Plan Reporting

- 610 1. The DOT&PF will produce an Annual Treatment Report to the Signatories and
611 Consulting Parties as part of the Annual PA Report and in accordance with the
612 annual reporting review time frames. The Annual Treatment Report will
613 describe the results of treatment as well as document the methods and
614 preliminary findings of the treatment effort conducted during that calendar year.
- 615 2. The DOT&PF will produce an End of Project Treatment Report that will
616 provide detailed analysis; results; or results of laboratory testing, drawings,
617 photographs, and final figures. It will be completed no later than 12 months
618 following completion of all treatment activities. The DOT&PF will seek written

619 comments on the report from the Signatories and Consulting Parties within a
620 90-day review period. The DOT&PF will review comments from the
621 Signatories and Consulting Parties, and will incorporate comments into the
622 Final Treatment Report, as appropriate. The DOT&PF will distribute the Final
623 Treatment Report to Signatories and Consulting Parties within 90 calendar days
624 following the review period and prior to the conclusion of this PA.

625 E. Standard Treatment Measures

- 626 1. For adverse effects to archaeological sites, the DOT&PF will consult with
627 Consulting Parties to determine representative sites that will be subject to data
628 recovery or another agreed-upon mitigation approach. The details of this will
629 be spelled out in Appendix D, *Treatment Plan*.
- 630 2. For adverse effects to each historic site and the built environment, the
631 DOT&PF, in consultation with Signatories and Consulting Parties, may select
632 from the following indirect mitigation measures or develop a resource-specific
633 plan to resolve adverse effects to historic properties:
- 634 a. A storymap or other interactive online resource interpreting the history of
635 the region for the public;
 - 636 b. A publication for the public; or
 - 637 c. Resource-specific interpretive and/or treatment plans as detailed in
638 Appendix D, *Treatment Plan*.
- 639 3. For adverse effects to sites or resources of significance to Tribes, the DOT&PF
640 will fund the following indirect mitigation measure:
- 641 a. The DOT&PF will ensure that ethnographic research and documentation is
642 completed using collaborative standards with an ethnographer that is
643 selected in coordination with Tribal entities and Consulting Parties.

644 F. Monitoring

- 645 1. The DOT&PF will provide archaeological monitoring when determined
646 necessary, in consultation with the Signatories and Consulting Parties.
- 647 a. The DOT&PF may implement archaeological monitoring to facilitate low-
648 impact activities within areas with high potential to contain archaeological
649 sites that have not received intensive pedestrian survey. The DOT&PF may
650 not use archaeological monitoring in lieu of intensive pedestrian survey in
651 advance of grubbing, construction, and other high-impact activities.
 - 652 b. Prior to design review, the DOT&PF will include recommendations for the
653 locations of archaeological monitoring in findings of effect correspondence,
654 as needed to complete permitting and preliminary design.
- 655 2. The DOT&PF will support and accommodate Tribal monitoring when
656 determined necessary, in consultation with interested Tribal entities and the
657 SHPO.

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3. The DOT&PF will draft and implement a Monitoring Plan, in consultation with the Signatories and Consulting Parties. The Monitoring Plan will contain:
 - a. Professional qualification standards;
 - b. Cultural Resources Awareness Training process and implementation guidance;
 - c. Methods;
 - d. Stop-work authorities;
 - e. Inadvertent discovery notification processes;
 - f. Reporting requirements; and
 - g. Coordination requirements.
 4. The DOT&PF will consult with Signatories and Consulting Parties about improvements to the DOT&PF’s existing Cultural Resources Awareness Training materials and process.
 - a. The DOT&PF will distribute the current training materials to Signatories and Consulting Parties for a 30-day review period no later than 3 months following execution of this PA.
 - b. The DOT&PF will take timely comments received into consideration to revise the training materials and update its standard training process. The DOT&PF will distribute a final version for informational purposes to Signatories and Consulting Parties.
 5. The DOT&PF will conduct a preconstruction meeting for each phase of the Project no less than once per year. Attendees will include the DOT&PF Project Engineer, the DOT&PF PQI, the Construction Contractor, subcontractors, any on-site construction supervisory staff, the resident engineer, the supervisory archaeological monitor (“SAM”), other archaeological monitor(s), and Tribal monitor(s) to discuss the terms and conditions of this PA.
 - a. The DOT&PF will notify Signatories and Consulting Parties of the preconstruction meeting via email at least 30 days prior to when the meeting is scheduled. The DOT&PF will explain the roles of the SAM, archaeological monitor(s), and Tribal monitors(s) as well as the procedures to follow in the event of inadvertent discoveries, discovery of inadvertently affected historic properties, or discovery of human remains.
 - b. The SAM will conduct on-site cultural resources awareness training at least annually with Project personnel to educate them about the terms of this PA, as stipulated in Appendix C, *Monitoring Plan*.
 - c. The DOT&PF will invite Signatories and Consulting Parties to participate in the training to provide their perspective.
 6. Archaeological monitors and Tribal monitors will be authorized to request that the SAM temporarily stop work in a specific location. DOT&PF’s Project Engineer, who has authority over the Contractor and may suspend work, shall be immediately notified of the SAM’s instruction to temporarily stop work. The

- 699 Project Engineer may redirect work to other locations while the PQI and SOI
700 qualified professionals oversee the documenting; evaluating; and, if necessary,
701 recovering previously unidentified cultural resources, or in the event that
702 historic properties are inadvertently affected.
- 703 7. The DOT&PF will notify Signatories and Consulting Parties of inadvertent
704 discoveries or inadvertent effects to historic properties as outlined in
705 Appendix C, *Monitoring Plan*.
- 706 8. If human remains in any form, including fragmented or cremated human
707 remains, are encountered by anyone during monitoring or any construction
708 activities, then work will immediately stop within at least 50 feet of the
709 discovery. All human remains will be treated respectfully and in accordance
710 with Stipulation VII and Appendix F, *Human Remains Protocol*.

711 VII. Treatment of Human Remains

- 712 A. Stop Work at the Discovery Site
- 713 1. The DOT&PF will ensure that any time human remains are encountered, that
714 portion of the work affecting the discovery will stop immediately and the
715 DOT&PF Project Engineer will immediately take steps with the Construction
716 Contractor to secure and protect the discovery location.
- 717 B. Notifications
- 718 1. The Project Engineer and a PQI will provide information about the discovery
719 in their notification to: the Alaska State Troopers; the State Medical Examiner
720 (“SME”); the SHPO; the DOT&PF Statewide Environmental Program
721 Manager; and Tribal entities.
- 722 C. SME Determination
- 723 1. The SME will determine if the human remains are of a forensic nature and/or
724 subject to criminal investigation. If the human remains are part of a crime scene,
725 the SME will take control of the discovery.
- 726 D. Consultation
- 727 1. If the human remains are not part of a crime scene, the DOT&PF will
728 expeditiously consult with interested Tribal entities or local community or
729 government representatives, as appropriate, on the treatment and disposition of
730 such remains.
- 731 E. Further Guidance
- 732 1. Refer to Appendix F, *Human Remains Protocol* for detailed guidance.

733 VIII. Inadvertent Discoveries and Unanticipated Effects to Historic
734 Properties

735 A. Process

- 736 1. If, during the implementation of the undertaking, monitors or other Project
737 personnel inadvertently discover a previously unidentified cultural resource or
738 witness that a known historic property is inadvertently affected, the DOT&PF
739 will consult with the Signatories and Consulting Parties as appropriate in
740 accordance with Appendix G, *Discovery Plan*. The DOT&PF will ensure that
741 work ceases within the area of the inadvertent discovery or effect until the
742 DOT&PF can evaluate the previously unidentified cultural resource or the
743 unanticipated effect in consultation with Signatories.
- 744 2. The DOT&PF will develop a Monitoring and Data Recovery Plan in
745 consultation with the Signatories and Consulting Parties. If monitors identify
746 an additional cultural resource during construction, the resource will be
747 assumed eligible for NRHP listing until further evaluation can be conducted. If
748 the resource cannot be avoided or effects sufficiently minimized, the DOT&PF
749 will follow NRHP evaluation methods.
- 750 3. The SOI-qualified archaeologist(s) and Tribal monitor(s) will document any
751 inadvertently discovered cultural resource encountered to support a DOE for
752 the resource using established NRHP criteria. The DOT&PF will assess NRHP
753 eligibility in consultation with the federal land-managing agencies and other
754 Signatories. The PQI will resolve any disputes between the Signatories
755 concerning eligibility pursuant to 36 CFR 800.4(c)(2) and 36 CFR 63.
- 756 4. For those properties found to be eligible for inclusion in the NRHP, if effects
757 cannot be avoided or minimized to avoid adverse effects, the DOT&PF will
758 apply the criteria of adverse effect (36 CFR 800.5) in consultation with the
759 Signatories. If it is determined eligible, a site-specific treatment plan may be
760 developed if the methods discussed in Appendix D, *Treatment Plan*, are not
761 appropriate for the resource. If the DOT&PF, in consultation with the
762 Signatories, determines that there is an adverse effect to the historic property, it
763 will follow the methods outlined in the *Treatment Plan* (Stipulation VI.E and
764 Appendix D, *Treatment Plan*).
- 765 5. The DOT&PF will make information available to the public such as through
766 the Project meetings, notifications, and monthly newsletters regarding adverse
767 effects or inadvertent discoveries and will afford members of the public an
768 opportunity to express their views on resolving adverse effects pursuant to 36
769 CFR 800.6(a)(4). Public disclosure of confidential information is subject to 36
770 CFR 800.11(c).

771 IX. Curation

772 A. Archaeological Resources

- 773 1. The DOT&PF will accession to the University of Alaska, Museum of the North
774 (“UAMN”) all artifacts, faunal remains, and/or samples collected, along with
775 photographs, video, field notes, and related materials recovered by
776 archaeologists or during Project activities on SOA-owned or controlled land.
777 The DOT&PF has a standing curation agreement with the UAMN (see
778 Appendix H, *Curation Plan*).
- 779 2. The Alaska Historic Preservation Act (AS 41.35.020) recognizes the cultural
780 rights and responsibilities of persons of Alaska Native descent for conditional
781 possession and use of their valued historic, prehistoric, and archaeological
782 resources. AS 41.35.020(b) outlines the conditions for local cultural groups to
783 obtain or retain materials in coordination with the SOA.
- 784 3. The Curation Plan funds reasonable costs associated with curation of materials
785 collected in conjunction with the data recovery actions under this PA when the
786 DOT&PF transfers those materials for deposition and curation at an acceptable
787 receiving institution as defined by 36 CFR 79. The costs (e.g., accessioning fee,
788 initial curation fee) are identified in the Curation Plan to be funded by the
789 DOT&PF. Any long-term maintenance fees, if identified, for curation of
790 materials recovered in association with this Project will be negotiated through
791 a curation agreement with the UAMN and the appropriate land-managing
792 agency and/or owner.
- 793 4. The DOT&PF and associated contractors will be responsible for artifacts and
794 collected materials from the time of their removal until deposit at the UAMN
795 in a secure, climate-controlled facility.

796 X. Annual PA Reporting and Review

797 A. Annual PA Report

- 798 1. The DOT&PF will submit an Annual PA Report on or before January 31 of
799 each year that the undertaking is ongoing to the Signatories and Consulting
800 Parties addressing the following details, including but not limited to:
- 801 a. Progress on Project design and/or construction;
- 802 b. Progress on historic properties identification and construction monitoring
803 under Stipulations IV and VI.F, including fieldwork and technical reports
804 as applicable;
- 805 c. Progress on implementation of treatment/mitigation measures under
806 Stipulation VI, including fieldwork and technical reports as applicable;
- 807 d. Progress on artifact collection and curation under Stipulation IX;
- 808 e. Problems or unexpected issues encountered during the year;

- 809 f. Additional evaluations, assessment of effects (including a table of affected
810 sites), and most current treatment recommendations and/or implementation
811 efforts;
- 812 g. Table of contact information for Signatories;
- 813 h. Sequence and time frame of future PA actions not completed in the
814 reporting year;
- 815 2. The DOT&PF will recommend changes to this PA, including updates to the
816 APE, to improve its effective implementation, and initiate discussion with the
817 Signatories and Consulting Parties to collaboratively evaluate and consider
818 proposed changes. Any suggested changes will be adopted pursuant to
819 Stipulation XII.A governing amendments.
- 820 3. The DOT&PF will ensure that its annual reports are made available for public
821 review and comment (excluding information about site locations and culturally
822 sensitive or protected resources consistent with Section 304 of the NHPA
823 [56 U.S.C. 307103]).

824 B. Annual Report Review

- 825 1. The Signatories to this PA will review the annual report and provide comments
826 to DOT&PF within 90 days of receipt. Non-signatory parties to this PA may
827 review and comment on the annual reports(s) at their discretion and will be
828 afforded the same concurrent 90-day comment period as the Signatories. The
829 DOT&PF will review comments and provide a revised annual report within 30
830 days following the review period.

831 C. Annual Project Update Meeting

- 832 1. The DOT&PF will coordinate an Annual Project Update Meeting with all
833 parties to this PA to be held by the end of May.
- 834 2. The Signatories will review the annual report and status of this PA every year
835 as part of an Annual Project Update Meeting to consider whether its terms are
836 being properly met. Annual review will continue until all measures are
837 completed or 10 years from its execution date unless it is terminated or
838 extended. Stipulation XIII addresses PA duration and time extensions.
- 839 3. The DOT&PF may submit additional reports and correspondence (e.g., DOEs,
840 findings of effect, updates to Project design) to accommodate the Project's
841 schedule.
- 842 4. At the request of any Signatory to this PA, the DOT&PF will convene a meeting
843 (in addition to the Annual Project Update Meeting) to facilitate review and
844 comment or to resolve questions and/or concerns.
- 845 5. A table of reports and deliverables is included in Appendix J, *Reporting and*
846 *Deliverables Table* of this PA. This table includes a list of all reporting
847 deliverables required by this PA, a summary of what the report includes, the
848 review period, deadlines, and when the report will be finalized.

849 XI. Dispute Resolution

850 A. Process

- 851 1. Should any Signatory or Consulting Party to this PA object at any time to any
852 proposed actions or the manner in which the terms of this PA are implemented,
853 the DOT&PF will consult with such party to resolve the objection. If the
854 DOT&PF determines that the objection cannot be resolved, then it will:
- 855 a. Forward all documentation relevant to the dispute, including the
856 DOT&PF’s proposed resolution, to the ACHP. The ACHP will provide the
857 DOT&PF with its advice on the resolution of the objection within 30 days
858 of receiving adequate documentation. Prior to reaching a final decision on
859 the dispute, the DOT&PF will prepare a written response that takes into
860 account any timely advice or comments regarding the dispute from the
861 ACHP, Signatories, and Concurring Parties, and will provide them with a
862 copy of the written response.
- 863 b. The DOT&PF will then proceed according to its final decision. If the ACHP
864 does not provide its advice regarding the dispute within the 30-day period,
865 the DOT&PF may make a final decision on the dispute and proceed
866 accordingly. Prior to reaching such a final decision, the DOT&PF will
867 prepare a written response that takes into account any timely comments
868 regarding the dispute from the Signatories and Consulting Parties to this PA
869 and provide them and the ACHP with a copy of the written response.
- 870 2. DOT&PF’s responsibility to carry out all other actions subject to the terms of
871 this PA that are not the subject of the dispute remain unchanged.
- 872 3. If, at any time during implementation of the measures stipulated in this PA, a
873 member of the public with a demonstrated interest in the undertaking (per 36
874 CFR 800.2(c)(5)) raises an objection to stipulations or their manner of
875 implementation, DOT&PF shall consider requests for Consulting Party status
876 (per 36 CFR 800.3(f)(3)). If DOT&PF grants Consulting Party status, DOT&PF
877 shall take the objection into account and consult as needed with the objecting
878 party and will notify the Signatories within two (2) business days to address the
879 objection.

880 XII. Amendments

881 A. Process

- 882 1. Any Signatory or Consulting Party to this PA may propose to the DOT&PF that
883 this PA be amended. The Signatories and Consulting Parties will consult for a
884 minimum of 30 days to reach an agreement to amend this PA.

885 a. This PA may be amended only upon written concurrence of all Signatories.
886 The amendment will be effective on the date a copy signed by all of the
887 Signatories is filed with the ACHP.

888 b. If the Signatories do not agree to the amendment, then this PA will stand as
889 is.

890 B. Deadline Extension

891 1. Deadline extensions will not require an amendment.

892 c. Any Consulting Party may submit a request in writing to the DOT&PF for
893 additional time to respond to requests for review and comment. All requests
894 will be considered, and the DOT&PF will notify the Signatories and
895 Consulting Parties within 5 business days if a request is granted.

896 d. DOT&PF will notify Signatories and Consulting Parties of any delays that
897 will require additional time to complete deliverables and other measures
898 required by this PA. Any schedule updates will be documented in the
899 Annual PA Report. Any delays that shift the expected delivery of a
900 treatment measure or other term of this PA that extend beyond 1 year will
901 be documented in an updated Appendix J, *Reporting and Deliverables*
902 *Table*.

903 C. Streamlined Process

904 1. PA appendices may be amended with a streamlined process.

905 a. Appendix A, *Area of Potential Effects*: As needed, the DOT&PF may
906 propose an update to the APE and will distribute the revised APE for a 30-
907 day review and comment period. The DOT&PF will consider timely
908 comments received and will provide an updated Appendix A, *Area of*
909 *Potential Effects*, to Consulting Parties with the Annual PA Report or within
910 60 days, whichever comes first.

911 b. PA Appendices B through K: The Signatories may agree through formal
912 consultation to amend the appendices to this PA with written concurrence
913 (e.g., email, letter) without requiring amendment to the body of this PA,
914 unless their consultation determines otherwise (i.e., amending and re-
915 signing this PA).

916 D. Amendment Documentation

917 1. The DOT&PF will document all amendments to the PA in Appendix I,
918 *Amendment Log*. The DOT&PF will provide revised versions of this PA or PA
919 appendices to the Consulting Parties within 30 days of finalization, unless
920 otherwise noted or agreed upon by the Signatories.

921 XIII. Duration

922 A. PA Duration

923 1. The duration of this PA will be 10 years from the date of its execution unless it
924 is terminated or extended.

925 B. PA Extension

926 1. At least 6 months prior to the end of the duration, the Signatories will consult
927 and meet, if necessary, to discuss a time extension to complete the stipulations
928 and measures set forth under this PA. This may coincide with the Annual
929 Project Update Meeting (Stipulation X.C). The DOT&PF will be the
930 responsible party for convening all Signatories and Consulting Parties for this
931 meeting.

932 2. DOT&PF may request in writing that the Signatories and Consulting Parties
933 review the Project schedule and consider an extension or modification of this
934 PA. No extension or modification shall be effective unless all Signatories to this
935 PA have agreed to it in writing (Stipulation XII.A.1).

936 XIV. Termination

937 A. PA Termination

938 1. If any Signatory to this PA determines that its terms will not or cannot be carried
939 out, that party will immediately consult with the other Signatories to attempt to
940 develop an amendment per Stipulation XII. If within 30 calendar days (or
941 another time period agreed to by all Signatories) an amendment cannot be
942 reached, any Signatory may terminate this PA upon written notification to the
943 other Signatories.

944 2. Once the PA is terminated and prior to work continuing on the Project, the
945 DOT&PF must either (a) execute an agreement pursuant to 36 CFR 800.6 or
946 (b) request, take into account, and respond to the comments of the ACHP under
947 36 CFR 800.7. The DOT&PF will notify the Signatories and Consulting Parties
948 as to the course of action it will pursue.

949 XV. Anti-Deficiency Act

950 A. DOT&PF's Obligations

951 1. The DOT&PF's obligations under this PA are subject to the availability of
952 appropriated funds, and the stipulations of this PA are subject to the provisions
953 of the Anti-Deficiency Act (31 U.S.C. 1341). The DOT&PF will make
954 reasonable and good faith efforts to secure the necessary funds to implement
955 this PA in its entirety. If compliance with the Anti-Deficiency Act alters or

956 impairs the DOT&PF’s ability to implement the stipulations of this PA, the
957 DOT&PF will consult in accordance with the amendment and termination
958 procedures found at Stipulations XII and XIV.

959 **Execution and Implementation** of this PA is evidence that the DOT&PF has taken into account
960 the Undertaking’s effects on historic properties in accordance with its responsibilities under
961 Section 106 of the NHPA.

962 **XVI. Signatories**

- 963 A. Primary Signatories
 - 964 1. DOT&PF
 - 965 2. Knik Tribe
 - 966 3. SHPO
- 967 B. Invited Signatories
 - 968 1. DNR
- 969 C. Concurring Parties
 - 970 1. BLM
 - 971 2. USACE
 - 972 3. FHWA
 - 973 4. Other Tribes
 - 974 5. Alaska Native Corporations
 - 975 6. IHTA

976 XVII. Appendices

- 977 A. Appendix A: Area of Potential Effects
- 978 B. Appendix B: Identification Plan
- 979 C. Appendix C: Monitoring Plan
- 980 D. Appendix D: Treatment Plan
- 981 E. Appendix E: [Reserved]
- 982 F. Appendix F: Human Remains Protocol
- 983 G. Appendix G: Discovery Plan
- 984 H. Appendix H: Curation Plan
- 985 I. Appendix I: Amendment Log
- 986 J. Appendix J: Reporting and Deliverables Table
- 987 K. Appendix K: Consulting Parties

988 XVIII. Glossary and Definitions

989 **Consultation:** Under Section 106 of the NHPA, this means the process of seeking, discussing, and
990 considering the views of other participants, and, where feasible, seeking agreement with them
991 regarding matters arising in the Section 106 process.

992 **Consulting Party:** This is any group, entity, or person that has a demonstrated interest in the
993 undertaking and has participated in the PA development or indicated they wish to participate in
994 the Section 106 process as defined by 36 C.F.R. § 800.2(c). This includes Tribes, agencies, local
995 governments, nonprofit organizations, and the permittee.

996 **DOE (or Determination of Eligibility):** A DOE is an evaluation of whether a property is eligible
997 for listing in the NRHP, following guidance provided in NPS’s Bulletin 15 *How to Apply the*
998 *National Register Criteria for Evaluation*.

999 **Government-to-Government Consultation:** This recognizes the unique, nation-to-nation
1000 relationship between the United States government and Federally Recognized Tribes as sovereign
1001 nations. Formal Government-to-Government Consultation is a two-way, nation-to-nation
1002 exchange of information and dialogue between official representatives of the United States and
1003 Federally Recognized Tribes regarding federal policies that have Tribal implications. It requires
1004 that information obtained from Federally Recognized Tribes be given meaningful consideration,
1005 and agencies should strive for consensus, or a mutually desired outcome, with Federally
1006 Recognized Tribes. Government-to-Government Consultation will ensure that applicable
1007 information is readily available to all parties; federal and Tribal officials have adequate time to
1008 communicate; and after the federal decision, consulting Federally Recognized Tribes are advised

1009 as to how their input influenced that decision making. All of these principles should be applied to
1010 the extent practicable and permitted by law.

1011 **Federally Recognized Tribe:** This means any Indian or Alaska Native tribe, band, nation, pueblo,
1012 village, or community that the SOI recognizes as eligible for the special programs and services
1013 provided by the United States to Indians because of their status as Indians, as listed pursuant to the
1014 Federally Recognized Indian Tribe List Act of 1994 (Public Law No. 103–454; 25 U.S.C. 5131).

1015 **Historic Property:** This is any prehistoric or historic district, site, building, structure, or object
1016 included in, or eligible for inclusion in, the NRHP maintained by the SOI. This term includes
1017 artifacts, records, and remains that are related to and located within such properties. This term
1018 includes properties of traditional religious, spiritual, or cultural importance to a Tribe and that meet
1019 the NRHP criteria.

1020 **Indian Tribe:** Under Section 106, this means an Indian Tribe, band, nation, or other organized
1021 group or community, including a Native village, regional corporation, or village corporation, as
1022 those terms are defined in Section 3 of the ANCSA (43 U.S.C. 1602), and is recognized as eligible
1023 for the special programs and services provided by the United States to Indians because of their
1024 status as Indians as is consistent with 54 U.S.C § 300309 and 36 C.F.R. § 800.16(m)

1025

1026 **Invited Signatory:** An Invited Signatory is defined by 36 C.F.R. § 800.6(c)(2). In the context of
1027 this Project, the DNR is the Invited Signatory and is one of the Signatories.

1028 **Low-impact Activity:** A low impact activity is an activity that has limited to low potential to
1029 cause damage to the ground surface that would disturb an unidentified buried archaeological site
1030 or would be managed in such a fashion as to avoid or prevent effects to identified historic
1031 properties on the surface. Vegetation would be cleared with hand tools; impacts to the ground
1032 surface would be avoided by use of tundra mats or operating when the ground surface is frozen or
1033 snow covered; activities would be monitored by SOI qualified and Tribal observers to aid in
1034 minimizing impacts.

1035 **Monitoring:** This is the stationing of an archaeologist or other subject matter expert on a
1036 construction site to examine construction activity areas for evidence of archaeological remains
1037 during ground-disturbing construction activities.

1038 **NHPA** (or National Historic Preservation Act): The NHPA (54 U.S.C. 300101–307108) is the
1039 primary federal law governing the preservation of historic resources in the United States. This law
1040 established a national preservation program and system of procedural protections that encourage
1041 the identification and protection of historic resources of national, state, Tribal, and local
1042 significance.

1043 **NRHP** (or National Register of Historic Places): The NRHP is the official list of the nation’s
1044 historic places worthy of preservation. Authorized by the NHPA of 1966, the NRHP is part of a
1045 national program to coordinate and support public and private efforts to identify, evaluate, and
1046 protect America’s historic and archeological resources.

1047 **PA** (or Programmatic Agreement): This is a document that records the terms and conditions agreed
1048 upon to resolve the potential adverse effects of a federal agency program, complex undertaking,
1049 or other situations in accordance with 36 CFR 800.14(b).

1050 **Primary Signatory:** In the context of this Project, the Primary Signatories are the DOT&PF, Knik
1051 Tribe, and SHPO.

1052 **Section 106:** Section 106 of the NHPA of 1966 requires federal agencies to consider the effects of
1053 projects they carry out, assist, fund, permit, license, or approve throughout the country (known as
1054 “undertakings”) on historic properties. The Section 106 process requires federal agencies to
1055 identify historic properties; assess effects on those properties; and resolve adverse effects through
1056 avoidance, minimization, or mitigation. Section 106 gives the ACHP, interested parties, and the
1057 public the chance to comment on these matters before a final decision is made. The ACHP has
1058 issued regulations (36 CFR 800) that guide how agencies should fulfill this responsibility.

1059 **SHPO** (or State Historic Preservation Officer): Every state and United States Territory has a SHPO
1060 who, with the support of qualified staff, is charged with: conducting a comprehensive survey of
1061 historic properties; maintaining an inventory of historic properties; identifying and nominating
1062 eligible properties for the NRHP; advising and assisting federal, state, and local governments in
1063 matters of historic preservation; preparing and implementing a statewide historic preservation
1064 plan; providing public information, education, training, and technical assistance; and providing
1065 consultation for federal undertakings under Section 106 of the NHPA.

1066 **Signatory:** This includes Primary and Invited Signatories that have the legal authority to execute
1067 the PA and enforce its terms as defined by 36 C.F.R. § 800.6(c)(1) and 36 CFR § 800.6(c)(2).

1068 **SAM** (or supervisory archaeological monitor): This is an SOI-qualified archaeologist who is
1069 present at the job site for the duration of the monitoring program. They conduct monitoring and/or
1070 supervise historic property monitors on site. The SAM has temporary stop-work authority. They
1071 must have a master’s degree in archaeology or a closely related field, plus at least 1 year of
1072 supervisory experience conducting archaeological fieldwork in Alaska.

1073 **Treatment Plan:** This specifies how a project will avoid, minimize, or mitigate adverse effects on
1074 historic and cultural resources.

1075 **Undertaking:** This is a project, activity, or program funded in whole or in part under the direct or
1076 indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal
1077 agency; those carried out with federal financial assistance; and those requiring a federal permit,
1078 license, or approval as defined at 36 CFR 800.16(y).

Appendix A

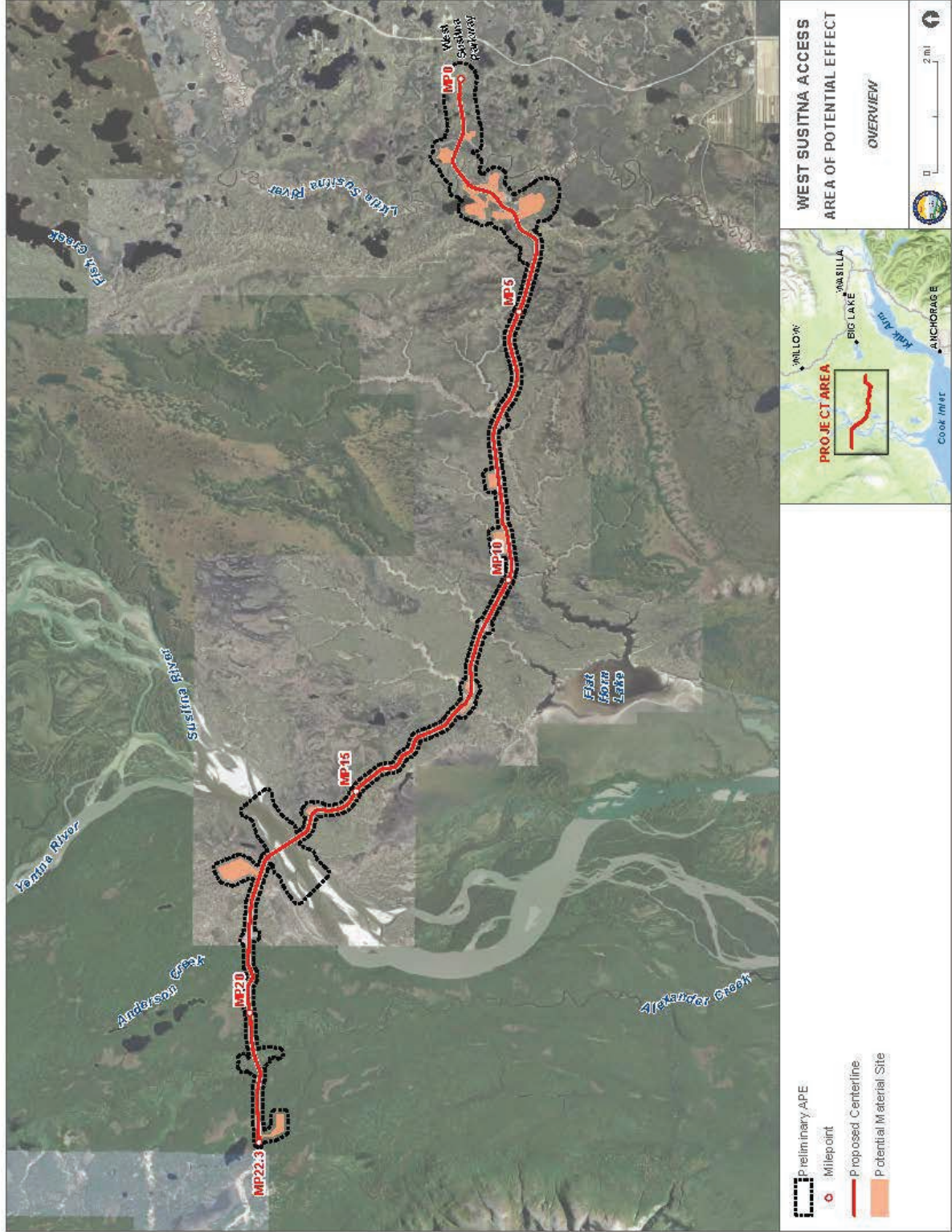
Area of Potential Effects

Under 36 CFR 800.16(d), the Area of Potential Effects (APE) is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historical properties, if any such properties exist.”

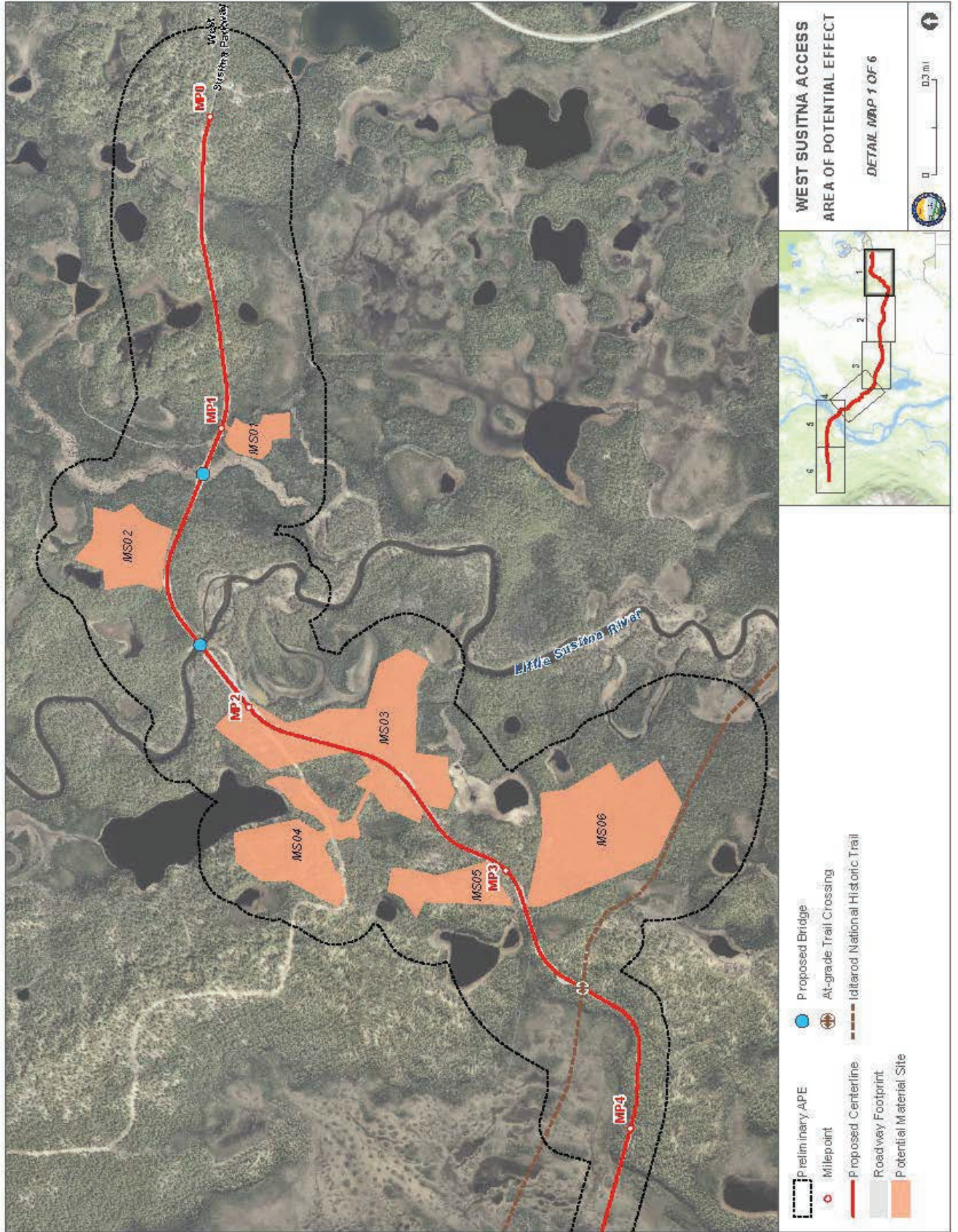
For the purpose of considering effects under Section 106, the APE will be as depicted on the maps available on the confidential Web Mapper for the Project. This includes a 500-foot buffer on either side of the road alignment centerline to provide a corridor within which minor design changes can be accommodated through the project. This buffer also applies to bridge and culvert locations, material sites, boat launches, as well as the hydrology and hydraulics (H & H) work areas. The APE extends 5,000 feet upstream and downstream where the project centerline crosses the Big Susitna River. The APE also includes an area 500 feet inland from each side of each stream crossing. 150-foot buffers will be used as a baseline for helicopter landing sites from a central point.

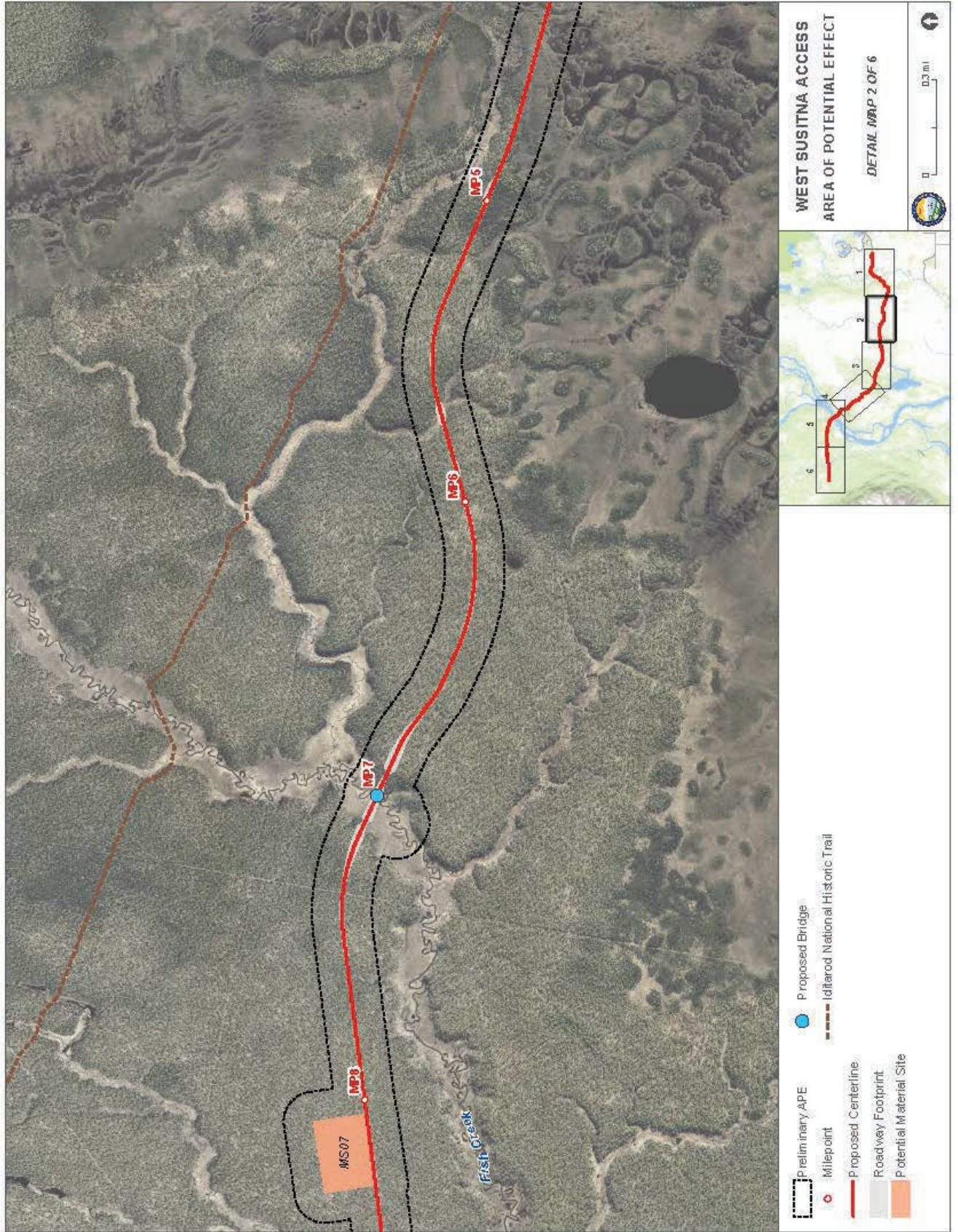
Additional watershed analysis, noise effects analysis, or dust studies, as well as changes in project design may necessitate a modification in the boundary of the APE. Changes to the APE may occur through the life of the project. DOT&PF will consult with Signatories and Consulting Parties regarding any proposed changes to the APE.

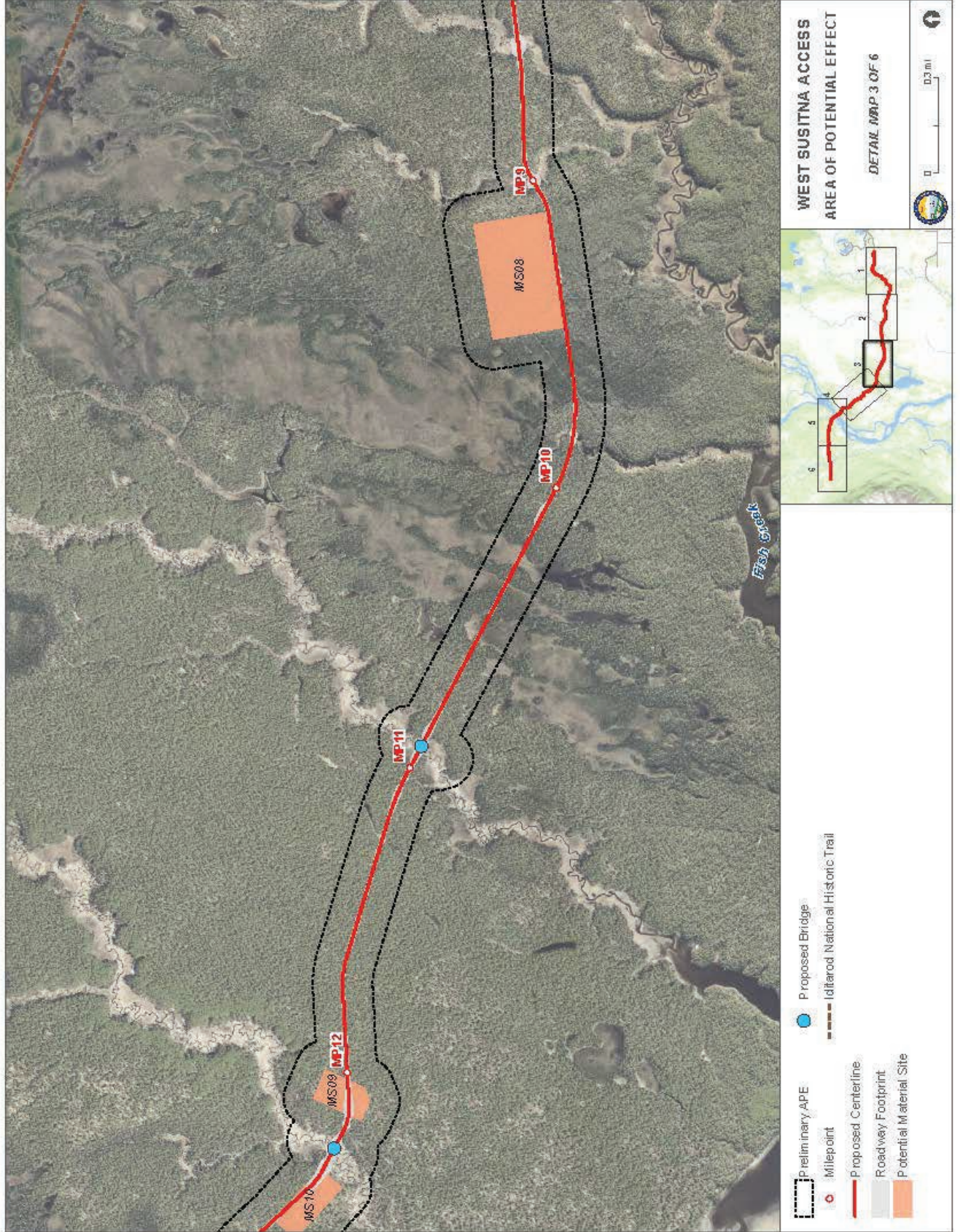
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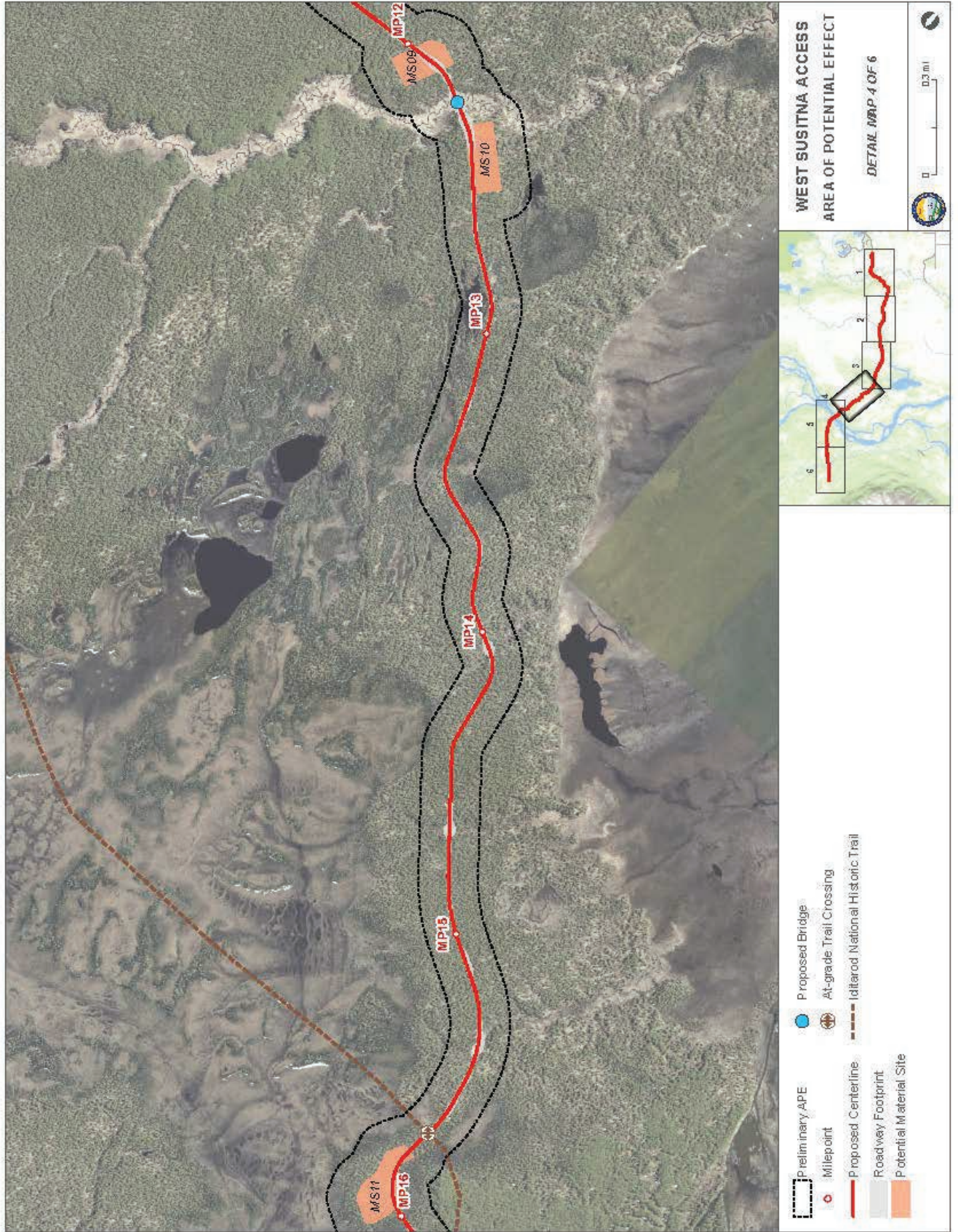


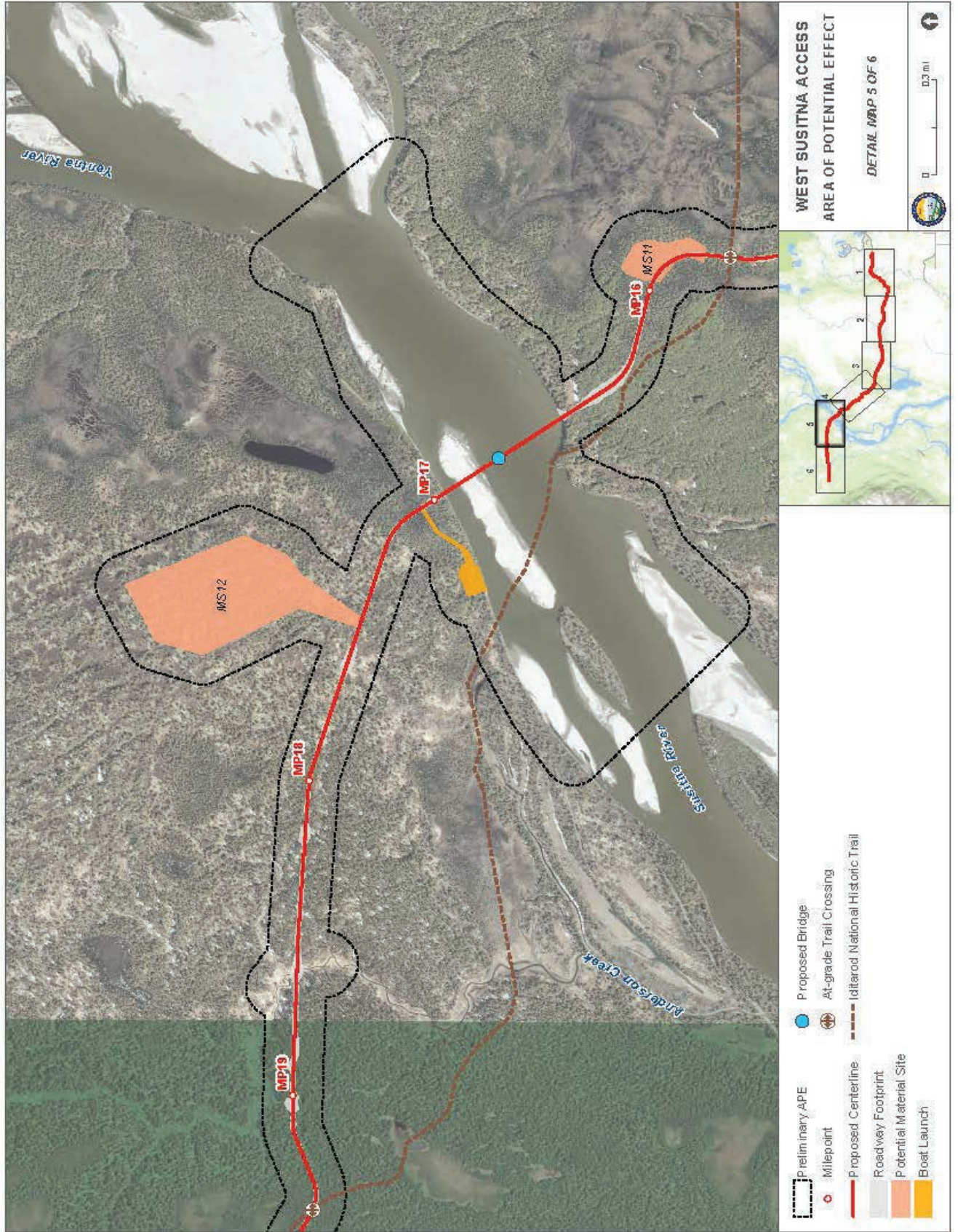
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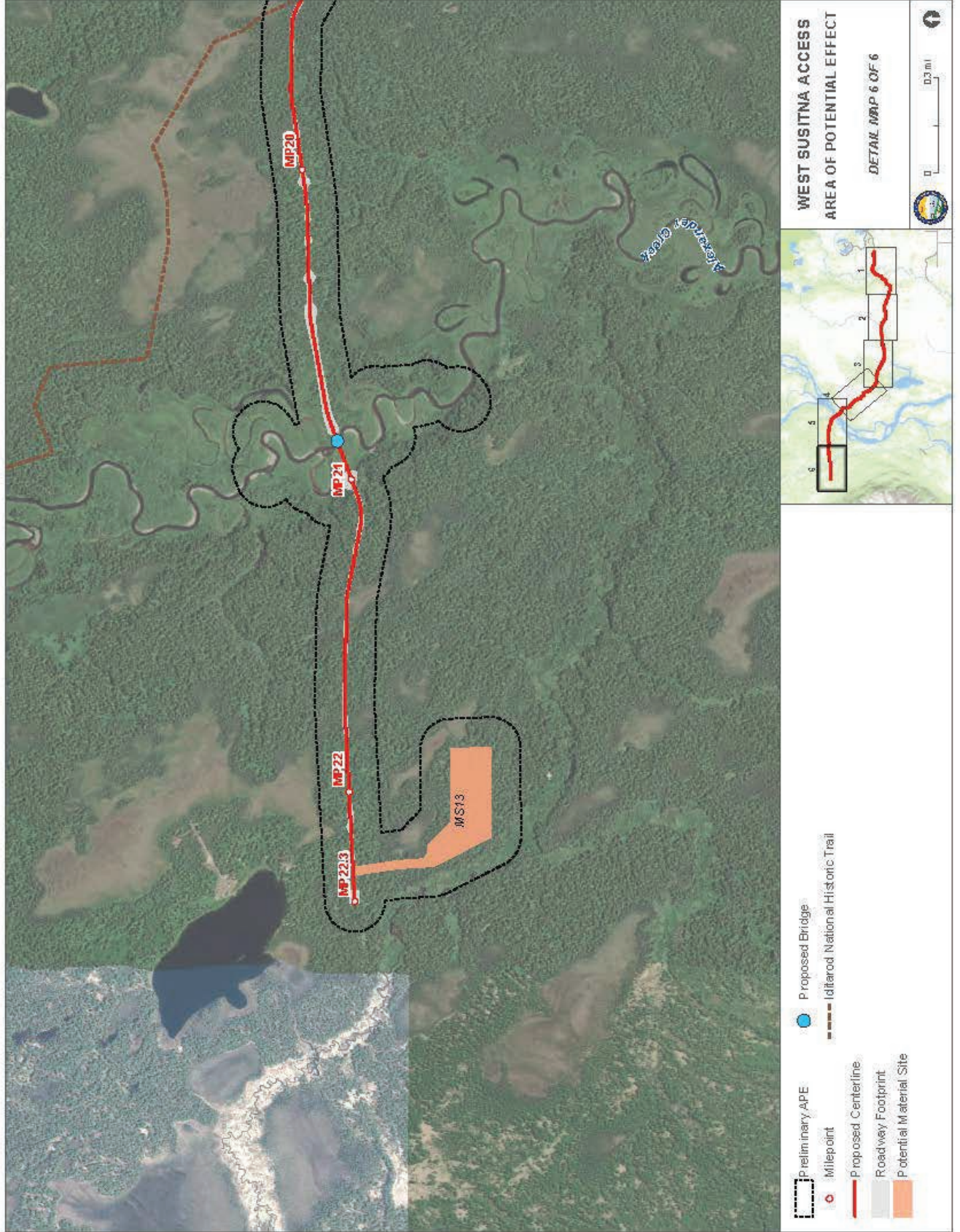








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Appendix B

Identification Plan

Per PA Stipulation III.A – Documentation and Appendix Review

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The DOT&PF will facilitate monthly consultation meetings among Signatories and Consulting Parties to discuss this PA's progress, and to draft and/or finalize the remaining appendices either via phone or in-person, or as determined necessary.

The DOT&PF will provide Signatories and Consulting Parties with revisions to the noted appendices at least 15 working days prior to any meetings. The DOT&PF will incorporate comments received as appropriate, and will provide updated drafts to Signatories and Consulting Parties. The first and last reviews will be 30-day periods.

I. Sampling Strategy

The DOT&PF will implement a sensitivity model that will be iteratively tested and improved annually.

- A. 100% of high potential areas within the ROW and the proposed use areas for material sites shall receive intensive pedestrian archaeological survey.
- B. 30% of low potential areas within the proposed ROW and the proposed use areas for material sites shall receive intensive pedestrian archaeological survey.
- C. 50% of high potential areas within 500 feet of the ROW that are also within 91 meters (300 feet) of water bodies shall receive intensive pedestrian archaeological survey.

II. Intensive Pedestrian Survey

- A. Survey transects: 5 to 10 meter (16 to 30 foot) spacing, dependent upon ground visibility.

B. Subsurface testing: 50 cm (20”) square units, screened with 6.4 millimeter (1/4”) mesh to identify sites. Archaeological crews will conduct at least one subsurface test on high potential landforms or within high potential areas. The crew lead may determine that a high potential area does not warrant testing, but this decision must be documented thoroughly.

C. Metal detector: Alternate transect paths within 100 meters (328 foot) of historic trails, known locations of historic activities, and as otherwise deemed appropriate by crew leads. Initial positives or finds will be investigated with a subsurface test, unless in or within 30 meters (100 feet) of a known cemetery.

III. Characterize sites/cultural resources:

A. Archaeological crews will adjust their investigation methods to describe and otherwise gather sufficient information to determine whether sites are individually or collectively eligible for the National Register of Historic Places (NRHP) or contributing elements to a historic district and determine their extent to inform avoidance.

B. Survey transects may be reduced in spacing to below 5 meters. Brushing vegetation may be needed to document a site.

C. Subsurface testing: 50 cm (20”) square units, screened with 6.4 millimeter (1/4”) mesh. Tests will be placed in a radial grid extending out from known cultural materials at 5- or 10-meter intervals using either a landform-based approach or a two negative tests strategy. Once the crew lead determines that sufficient information has been collected regarding the stratigraphy and character of a site, they may elect to forgo interval testing between positive tests.

D. Features: Crews will collect a soil sample from any features if found. Field documentation will ensure that the provenience of each of these samples is included on the bag or label, including relationship to cultural or features or other intensively used layers are collected if 6.4 millimeter (1/4”) mesh is used within a site.

E. Collection: If found, dating material (such as charcoal), will be collected and its relationship to any cultural materials or layers will be included in its provenience information. Any artifacts found sub-surface will be collected, preferably by natural layers or by 10-cm (4”) arbitrary levels. Fire-cracked rock will be characterized by size, weighed, and reinterred with backfill. Surface diagnostic artifacts will be collected after their location has been recorded. Historic artifacts found on the surface may be documented and left in the field.

F. Metal detector: Sweep outward from known artifact or features to define metal artifact distribution and inform site size. When multiple sub-surface metal hits are made, the crew lead will determine if the crew needs to use a sampling strategy to investigate the finds. The crew lead will document the sampling strategy and why it was needed.

Appendix C

Monitoring Plan

Per PA Stipulation III.A – Documentation and Appendix Review

The stipulations of the PA are and will be guided by documents developed in consultation with Signatories and Consulting Parties. Many of these documents will be incorporated into the PA under designated appendices, and all guidance will be revised as additional information becomes available, including Project design.

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The DOT&PF will provide Signatories and Consulting Parties with revisions to the noted appendices at least 15 working days prior to any meetings. The DOT&PF will incorporate comments received as appropriate, and will provide updated drafts to Signatories and Consulting Parties. The first and last reviews will be 30-day periods.

I. Purpose and Scope

This Monitoring Plan provides general procedures and protocols for archaeological monitoring during construction of the West Susitna Access Road. Archaeological monitoring is the stationing of an archaeologist on a construction site to examine construction activity areas for evidence of archaeological remains during ground-disturbing construction activities. The Alaska Department of Transportation and Public Facilities (DOT&PF) is committed to archaeological construction monitoring to protect previously unidentified historic properties and human remains.

II. Cultural Resources, Historic Properties, and Human Remains

For the purposes of this document, the term ‘cultural resources’ refers to any archaeological sites; buildings; engineered structures; Alaska Native features and artifacts: round or rectangular structural pit features, basketry, projectile points, stone tools, hearths, grinding rock features, concentrations of modified bone, horn and antler, beads, cache pits, fire-cracked rock, pottery,

shell ornaments, cultural landscape features, and culturally modified trees; and historic-era features and artifacts such as building foundations, mining features, farming and homesteading features, glass bottles, ceramics, metal artifacts, and tin cans. Visible indications of cultural resources may be observed during construction in backhoe trenches, spoil piles, and cleared ground surfaces.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), historic properties are any prehistoric or historic district, site, building, structure, object, or traditional cultural property included in or eligible for inclusion in the National Register of Historic Places (National Register) (36 Code of Federal Regulations [CFR] 800.16(1)(1)). In other words, a historic property is a cultural resource that has been determined to be eligible for listing in the National Register.

Human remains refer to the body of a deceased person, in whole or in part, regardless of its stage of decomposition and post-mortem treatment. Cremated remains, or cremains, may vary in condition, based on the heat of the fire used, from ash to burned, but identifiable, bone. Visible indications of human remains may be observed during construction in backhoe trenches, spoil piles, and cleared ground surfaces.

III. Professional Qualifications and Standards

Work under the terms of this Monitoring Plan shall be carried out by or under the direct supervision of a person or persons meeting, at a minimum, the Secretary of the Interior's (SOI's) Professional Qualifications Standards for Archaeologists (36 CFR 61, Appendix A; Supervisory Archaeological Monitor). Additionally, all documentation, evaluation, treatment, and reporting of cultural resources as described for these procedures in this PA and its appendices will follow and meet current professional standards, including but not limited to the SOI *Standards and Guidelines for Archaeology and Historic Preservation* (48 *Federal Register* [FR] 44716) and the Documentation Standards described at 36 CFR 800.11.

IV. Tribal Monitor Participation

Important archaeological materials, artifacts, objects, features, and other resources of Tribal interest, including human remains associated with Alaska Native groups could be disturbed if encountered during Project construction. Tribal Monitors are generally individuals with local Tribal and cultural knowledge and expertise who can supplement archaeological knowledge brought by the Archaeological Monitors. DOT&PF shall invite Tribal Monitors to participate in the archaeological construction monitoring with one Tribal Monitor per monitoring team. DOT&PF shall fund X (X) Tribal Monitors from the consulting Alaska Native Tribes, and from the consulting Alaska Native Corporations, as appropriate and available, for their participation in the monitoring as described in this Monitoring Plan. The Tribes and Corporations shall select the Tribal Monitors who shall represent Alaska Native Tribal interests during monitoring activities. Though the Tribal Monitors represent the consulting Alaska Native Tribes and Corporations, they shall work in conjunction with the Archaeological Monitors to reduce the potential for the Project to affect historic properties and properties of religious and cultural significance.

To allow adequate time for the consulting Alaska Native Tribes and Corporations to select candidates for Tribal Monitoring, DOT&PF shall provide advance written and electronic notice of the construction schedule. The first notice will occur when the Project construction phase is obligated. The second notice will occur within a minimum of ninety (90) days before project construction begins.

V. Archaeological Construction Monitoring

Archaeological construction monitoring will involve the close inspection of excavations and other ground-disturbing activities within the Project construction footprint. Monitoring will follow excavations and construction as closely as conditions allow, making all reasonable efforts for safety and noninterference with construction. The DOT&PF Professionally Qualified Individual¹ (PQI; also referred to in Appendix E as the Central Region Cultural Resources Specialist) shall coordinate with the Project Engineer to ensure that an appropriate Supervisory Archaeological Monitor² (SAM) is provided and/or contracted prior to the beginning of construction. More than one (1) Archaeological Monitor may be required, depending on how much activity occurs simultaneously. The SAM will determine the number and placement of Archaeological Monitors after consultation with the DOT&PF PQI and Project Engineer. Monitoring will continue until the SAM has determined that excavation of the identified sensitive areas has reached the maximum depth at which cultural deposits can be expected.

A. Prior to Construction Activities

1. Acquire Permits for Archaeological Monitoring

Prior to any monitoring activities, DOT&PF or its qualified consultant shall acquire any permits necessary for conducting monitoring activities from the appropriate land managing agency and/or private landowner. DOT&PF and its contractors shall coordinate with all land-managing agencies to obtain a State Cultural Resource Investigations Permit (SCRIP) from the Alaska Department of Natural Resources Office of History and Archaeology. It is the responsibility of the permit holder to comply with any requirements or stipulations set forth in the permit.

2. Preconstruction Meeting

Prior to the initiation of construction activities on the Project, the DOT&PF Project Engineer, the DOT&PF PQI, Archaeological Monitor(s), and Tribal Monitors shall organize and participate in a pre-construction meeting with the Construction Contractor and their subcontractors to explain the PA

¹ The PQI is an SOI-qualified DOT&PF Cultural Resources Specialist.

² The Supervisory Archaeological Monitor may be the DOT&PF PQI or may be a qualified consultant under contract with DOT&PF, or the Knik Tribe.

stipulations for the Project and the procedures to follow if Project personnel inadvertently discover or affect historic properties, cultural resources, or human remains, as well as to explain the roles of the Archaeological Monitor(s) and Tribal Monitors.

DOT&PF will invite Signatories to attend the preconstruction meeting and DOT&PF will provide written and electronic notice to the Signatories at least 15 working days prior to the meeting. DOT&PF will notify the Construction Supervisor and other on-site authorities, in writing, of the presence and authority of the Archaeological and Tribal Monitors to halt construction work in the event of an inadvertent discovery or inadvertent effect to a historic property, cultural resource, or human remains. The Construction Supervisor shall inform all construction personnel of the role and authority of the monitors.

3. Cultural Resources Awareness Training

Prior to the beginning of construction activities on the Project, the DOT&PF PQI or the SAM shall conduct cultural resources awareness training to ensure that construction personnel understand the terms of the PA and the types of resources that could be inadvertently discovered or affected during Project construction activities. The training will provide guidance regarding the recognition of archaeological material and identify procedures for notifying supervisory personnel in the event suspicious or sensitive materials are encountered. Construction personnel will be shown examples of the types of sites, artifacts, and features that might be encountered in the Project area. The training will also include a discussion of pertinent federal, State, and local laws. The cultural resources training may occur concurrently with the pre-construction meeting.

4. Historic Property Protection Measures

DOT&PF shall avoid historic properties when possible, during Project activities. Prior to construction, the Archaeological Monitors will flag or guide the placement of construction fencing around historic properties as “avoidance areas” for construction personnel. No construction activities may occur in these areas. No one shall remove the flagging material or construction fencing from the “avoidance areas” until construction activities at the location are complete. The flagging material or construction fencing will be removed only by or under the guidance of the SAM. The SAM or PQI may employ other means at his or her discretion to avoid and minimize adverse effects to historic properties.

B. On-Site Archaeological Construction Monitoring Responsibilities

1. Both the Archaeological Monitors and Tribal Monitors have temporary “stop-work” authority if they believe sensitive archaeological materials are

at risk of being impacted by construction activities. Archaeological Monitors and Tribal Monitors are to immediately notify the SAM after temporarily stopping work. The SAM shall carefully consider the evidence or information presented and take appropriate action to protect archaeological deposits and potentially-eligible historic properties. The Archaeological Monitor(s) shall remain on-site in the delineated areas unless the SAM determines after field observations, in consultation with the Tribal Monitors, and in consultation with PA Signatories, that monitoring is not necessary in a particular location.

2. During construction, at least one (1) SOI-qualified Archaeological Monitor and Tribal Monitor shall be on the Project site while ground-disturbing activities are occurring.
3. Following completion of the ground-disturbing activities, the Archaeological Monitor and Tribal Monitor shall conduct a final site check for any inadvertently discovered or affected historic properties and human remains.
4. No construction or related activities will occur within the boundaries of historic properties that have been flagged or fenced as “avoidance areas.” The Archaeological and Tribal Monitor(s) will have maps and global positioning system (GPS) units with sub-meter accuracy, loaded with the historic property boundaries and grave locations during construction to ensure avoidance.
5. The Archaeological and Tribal Monitor(s) shall maintain daily logs documenting construction and ground-disturbing activities; communications with construction personnel, descriptions and provenience of any inadvertent discoveries or artifacts collected; historic properties inadvertently affected; and other pertinent information.
6. If a previously unidentified cultural resource, including but not limited to any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (25 U.S. Code 3001; NAGPRA) is encountered during construction activities, or a historic property is affected in an unanticipated manner, the Archaeological Monitor(s), Tribal Monitors, and construction personnel shall follow the procedures and protocols outlined in PA Stipulation VIII, *Inadvertent Discoveries and Unanticipated Effects*, and Appendix G, *Discovery Plan*.
7. If human remains or cremated human remains are inadvertently discovered or affected during monitoring or any construction activities, the Archaeological Monitor(s), Tribal Monitors, and construction personnel shall follow the procedures and protocols outlined in Stipulation VII, *Treatment of Human Remains*, and Appendix F, *Human Remains Protocol*.

In the event that a previously unidentified cultural resource is inadvertently discovered during Project activities, archaeological construction monitoring will occur within a 61 meter (200 foot) buffer of the discovery boundary once the resource has been fully documented, in accordance with Appendix G, *Discovery Plan*, and construction activities have resumed in that location.

8. Construction activities may continue elsewhere in the Project area outside of the designated discovery site.
9. Construction personnel and subcontractors may conduct no further work at the discovery site until the PQI or SAM directs the end of temporary stop work or the DOT&PF Project Engineer, in consultation with the SAM, Tribal Monitors, and Signatories, provides authorization to resume Project construction activities from a full work suspension. DOT&PF shall not permit vehicles, equipment, and unauthorized personnel to traverse the discovery site when work has been stopped.

C. Reporting Requirements

1. Weekly Monitoring Memos
 - a. The SAM and Tribal Monitors shall provide a summary construction monitoring memorandum on a weekly basis to the DOT&PF Project Engineer and the PQI. The memos will summarize monitoring activities, including details such as times and locations of monitoring, inadvertently discovered or affected cultural resources, historic properties, or burials, and other observations related to the monitoring. The PQI shall submit an electronic copy of the memo to the PA Signatories within two (2) days of its receipt for their ongoing information.
2. Summary Monitoring Report
 - a. When the construction monitoring is complete, the SAM, with input from the Tribal Monitors, shall provide to the Project Engineer and PQI a draft monitoring report summarizing the construction monitoring activities (detailing the overall monitoring effort and locations, inadvertent discoveries made, inadvertent effects to historic properties and graves, recommendations made to avoid or minimize effects, and relevant field observations) within ninety (90) days. The report is to meet contemporary professional standards and the SOI *Standards and Guidelines for Archaeological Documentation* (48 FR 44734–44737). The PQI shall provide the draft monitoring report to the PA Signatories for review and comment. Signatories shall have ninety (90) days to review and provide comments on the draft monitoring report to DOT&PF. DOT&PF shall address comments received during the review period, and will submit a final

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report to the Signatories within one (1) year after completion of all archaeological construction monitoring and prior to the conclusion of this PA. If construction monitoring occurs over several years, the SAM shall provide to the Project Engineer and PQI annual monitoring reports and one (1) final report summarizing the annual reports following the timeframes provided in this section.

Appendix D
Treatment Plan(s)

Per PA Stipulation III.A – Documentation and Appendix Review

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Standard Treatment for INHT and Historic Trails in APE

The nature and purpose of the INHT states that "These trails aggregating 2,037 miles, offer a rich diversity of climate, terrain, scenery, wildlife, recreation and resources in an environment largely unchanged since the days of the stamperders. It is the isolated, primitive quality of this historical environment that makes the National Historic Iditarod Trail proposal unique. Nowhere in the National Trail System is there such an extensive landscape, so demanding of durability and skill during its winter season of travel. On the Iditarod, today's adventurer can duplicate the experience and challenge of yesteryear." Any determination of significance, integrity, and effects to the INHT system should also consider effects to the trail's character, resources, qualities, values, and associated settings beyond those identified as cultural/historical. Therefore, evaluating existing scenic, recreational, and natural landscape elements inventory and updating where needed will be necessary.

Preserve as much of the historic trail system as possible. Employ design and construction methods to avoid adverse impacts to historic trail tread or trace from construction of recreational routes.

To facilitate honoring all RS2477 easements according to state law, which states "the pre-existing route must be allowed to continue unimpeded," implement the following:

- a. Clear, grade-separated crossings that allow for trail traffic to continue unimpeded on all trails throughout the project APE.
- b. All trail turns, features, and crossings must be adequate to allow passage of a 22-foot length minimum dog team.
- c. Manage trail crossings with warning signs and approaches suitable for dog mushers and other muscle powered users, and with adequate line of sight when approaching from either direction to mitigate user conflicts within the crossing.
- d. Crossings of adequate height to allow trail brushing equipment and wide enough for traffic in both directions.
- e. Install vegetation screening at trail crossings and anywhere the ROW is within 0.25 mile of an established trail, to minimize noise and visual disturbance while also providing clear line of sight for recreators approaching crossings at speed.
- f. INHT has an additional 400-foot negative easement corridor in addition to standard RS2477 easement.
- g. Use [Port MacKenzie project] as a starting point for determining trail user needs in the area, and update to reflect contemporary best practice and public scoping.
- h. Develop trail system, facilities, and signage that guide recreation traffic: to established trails, away from vulnerable sites or areas that are culturally significant to Native tribes, around private property onto appropriate terrain on public lands with legal access, including rerouting trails as necessary

- i. Use the Statewide Comprehensive Outdoor Recreation Plan and pertinent State Management Plans to guide development and management of recreation assets.
- j. Develop parking and recreation access facilities that would assist trail users. Consider users accessing recreational resources west of the Susitna River as well as on the trail system accessed via the project area. Evaluate for and install:
- k. Appropriately located and sized parking facilities to account for anticipated carrying capacity of the recreation system, to include at minimum a large public lot at the Susitna River crossing
- l. Parking deterrents, such as guardrails, vegetation, or elevated bridges at trail crossings to prevent roadside parking and nudge trail users to use established parking facilities
- m. Remote toilet facilities appropriate to the parking capacity
- n. Wayfinding signage to include trail system maps at trailheads, mile markers, wayfinding signage at trail junctions, and reflective markers suitable for winter travel
- o. Safety and law enforcement signage at appropriate locations, to include parking lots and trailheads
- p. Interpretive signage to highlight the historical nature of the trail system, to include a variety of eras and cultural uses of the trails, installed at trailhead kiosks and key historical sites along the trail system. Developed in accordance with the INHT Interpretive Plan and input by all Tribes consulting to this document who elect to participate.
- q. Define a carrying capacity for the trail system in the project area and develop strategies to manage within that capacity following accepted standards, such as the Interagency Visitor Use Management Council's *Visitor Capacity Guidebook* and *Visitor Use Management Framework*.

Standard Treatment suggestions for Susitna Station.

- a. Develop a multi-phase Susitna Station interpretive plan as a portion of the greater INHT Interpretive Plan with significant input and guidance from affected Tribes to guide appropriate public sharing of historical and cultural resources research and documentation of the site and its history to be submitted to an appropriate repository, such as ARLIS, upon completion.
- b. Implementation of a significant portion of the interpretive plan, i.e. Phase I. to include both on-site interpretation (signs, kiosks, protected sites for visitation), and non-local interpretation (such as publications, films, website, exhibit in a visitor center or museum).
- c. Appropriate in-perpetuity protection of any assets/sites that remain un-affected by the project.
- d. Treatment plan for this developed with input from Signatories and Consulting Parties.

- e. To include routing recreation traffic to developed trail areas and away from sensitive assets or culturally significant sites.

Appendix E

Reserved

West Susitna Access Road Project– Human Remains Protocol

FEDERAL NUMBER/CFHWY01209

Appendix F

Human Remains Protocol

I. Purpose and Scope

The following documentation describes the general procedures and protocols for coordination in the event of an inadvertent discovery of human remains under the *Programmatic Agreement Among the Alaska Department of Transportation and Public Facilities and the Alaska State Historic Preservation Officer Regarding the West Susitna Access Project*.

Human remains refer to the body of a deceased person, in whole or in part, regardless of its stage of decomposition, and cremated remains. Cremated remains, or cremains, are generally ash, but can include bone and teeth fragments. Visible indications of human remains may be observed during ground-disturbing activities.

II. Professional Qualifications and Standards

Work under the terms of the Human Remains Protocol will be carried out by or under the direct supervision of a person or persons qualified as a biological/physical anthropologist or archaeologist with training in osteological analysis, and experience in the evaluation of human remains. The archaeologist must also meet the minimum requirements under the Secretary of the Interior's (SOI's) Professional Qualifications Standards (36 Code of Federal Regulations § 61, Appendix A; SOI-qualified Archaeologist). Additionally, all documentation, evaluation, treatment, and reporting associated with a human remains discovery will follow and meet current professional standards, including, but not limited to, the SOI's Standards and Guidelines for Archaeology and Historic Preservation (48 Federal Register 44716).

III. Protocols at the time of Discovery of Human Remains

In the event that unanticipated human remains are encountered, the appropriate responsible parties shall take the following steps, as outlined below.

A. On-Site Construction Contractor Responsibilities

Step 1: Stop Work at a Discovery Site. If human remains are inadvertently discovered during the Project, all work that may further disturb the human remains will cease immediately within a minimum 200-foot radius of the discovery. In the event that an Archaeological or Tribal Monitor is not present, the discovery site is to be secured and protected by the Construction Contractor or Subcontractor until the DOT&PF Project Engineer and the DOT&PF Professionally Qualified Individual (PQI)¹ can assume responsibility. **All human remains will be treated with dignity and respect at all times.** All remains of bone(s) or bone fragments identified through inadvertent discovery will be treated as human until a qualified anthropologist/archaeologist can make a determination. Human remains will be covered for protection. No further work may be conducted at the discovery site until the DOT&PF Project Engineer provides authorization to resume project construction activities. DOT&PF shall be responsible for enforcing that no vehicles, equipment, and unauthorized personnel be permitted to traverse the discovery site.

Step 2: Notify the DOT&PF Project Engineer. The Construction Contractor shall immediately notify the DOT&PF Project Engineer regarding the discovery. If the Project Engineer cannot be

West Susitna Access Road Project– Human Remains Protocol
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reached, the Construction Contractor shall contact the PQI and/or the Regional Environmental Manager (REM). DOT&PF staff will make all other calls and notifications.

B. DOT&PF Project Engineer Responsibilities

Step 1: Ensure Protection of Discovery Site. The DOT&PF Project Engineer is responsible for taking appropriate steps to protect the discovery site. All work will stop in an area adequate to provide for the security, protection, integrity, and dignity of the human remains.

¹ The PQI is an SOI-qualified DOT&PF Cultural Resources Specialist.

Step 2: Notifications. The DOT&PF Project Engineer shall immediately notify the DOT&PF Central Region REM and/or PQI with location and all pertinent details regarding the discovery. The DOT&PF Project Engineer and the PQI shall immediately notify and provide information about the discovery to the following parties:

- Alaska State Troopers (AST)
- Alaska State Medical Examiner (ASME)
- SHPO / State Archaeologist at State of Alaska Office of History and Archaeology
- Alexander Creek, Inc., Chickaloon Native Village, Kenaitze Indian Tribe, Knik Tribe, Native Village of Eklutna, Native Village of Tyonek, Tyonek Native Corporation, and Cook Inlet Regional, Inc. (CIRI).

See Below, *Contact Information for Agency and Tribal Officials Involved with Human Remains Consultation* of the PA for specific contact information for agency and Tribal officials involved with human remains notifications. The PQI will be the primary point of contact for the PA Signatories². For any human remains discoveries encountered on State of Alaska or Matanuska Susitna Borough lands, DOT&PF will contact the land-managing State agencies and the Borough as appropriate.

Step 3: Direct Construction Elsewhere from Discovery Site. The DOT&PF Project Engineer may direct construction away from the discovery site to other areas after contacting the discovery notification consulting parties in Step 2.

IV. Identification of the Human Remains

- A. DOT&PF shall defer to local law enforcement, the AST, and the SME for a determination of whether the remains are of a forensic nature and/or subject to criminal investigation.
- B. If the AST and/or SME determine that the remains are neither of a forensic nature nor subject to a criminal investigation, a qualified anthropologist/archaeologist shall examine the human remains to determine racial identity.³ The anthropologist/archaeologist shall be the responsible party for securely transporting

² Though the DOT&PF PQI is the primary point of contact and shall ensure that the stipulations outlined in the Human Remains Protocol will be implemented, it is the responsibility of FHWA, as the lead federal agency, to ensure that the Project meets its compliance requirements under the National Historic Preservation Act.

³ The DOT&PF Project Engineer and PQI shall coordinate to procure the services of a SOI-qualified anthropologist/archaeologist for the analysis and documentation of the human remains discovery.

the remains to their analysis site, if warranted.⁴ The anthropologist/archaeologist shall provide DOT&PF information regarding their facility storage and security protocols prior to transport to ensure adequate and sensitive treatment of the remains. The anthropologist/archaeologist shall document, analyze, and photograph the remains so that an independent assessment of racial identity can be made. DOT&PF shall consult with the Signatories and Tribes on facility storage, security, analysis methods, place of analysis, and reporting of analysis to ensure all are carried out in a culturally appropriate manner. The anthropologist/archaeologist shall be afforded ninety (90) days to conduct their analysis and provide a written report of findings to DOT&PF. The Signatories and Tribes will be afforded ninety (90) days to review and provide written comments to DOT&PF on the anthropologist/archaeologist's report.

- C. When the AST and/or the SME have made a determination that a death investigation is not warranted and the remains are not of Native origin, then DOT&PF and FHWA in consultation with the SME shall attempt to identify, locate, and consult with descendants of the deceased. If no descendants are found, any necessary permits from the Alaska State Bureau of Vital Statistics will be obtained and the remains re-interred in a designated area to be determined in consultation with the landowner or land-managing agency associated with the property on which the remains were discovered.
- D. When the AST and the SME have made a determination that a death investigation is not warranted and the remains are of Native origin, then DOT&PF shall consult in accordance with the protocol described in this document, in PA Stipulation VII, *Treatment of Human Remains*, and Chickaloon Village Traditional Council's (CVTC) *Inadvertent Discovery Procedures* (see attached).

V. Consultation

- A. If the human remains are inadvertently discovered during Project activities, the PQI shall notify parties on the contact list within twenty-four (24) hours and expeditiously consult on the treatment and if determined appropriate following consultation, disposition of such remains.
- B. Should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (NAGPRA; 25 United States Code [USC] 3001 et seq.) be encountered, DOT&PF shall immediately notify the landowner or land managing agency and parties on the contact list, and proceed in accordance with PA Stipulation VIII, *Inadvertent Discoveries and Unanticipated Effects to Historic*

⁴ Prior to the removal of the remains, DOT&PF shall coordinate with the PA Signatories and Tribes on any blessing ceremonies to be performed at the discovery site.

Properties, and Appendix G, Cultural Resources Discovery Plan.

VI. Proceeding with Construction

- A. Project construction outside the human remains discovery site may continue as directed by the DOT&PF Project Engineer and Construction Contractor while documentation and assessment of the human remains at the discovery site proceeds.
- B. When the PQI ensures that the protocols outlined in this plan have been followed and that compliance with State and federal cultural resources laws has been completed, the DOT&PF Project Engineer may allow construction at the discovery site to resume.

VII. Federal and State Regulations Regarding Human Remains

The DOT&PF shall adhere to State laws and protocols in accordance with Alaska Statute (AS) 11.46.482(a)(6), AS 12.65.5, AS 41.35.200, and AS 18.50.250 pertaining to the discovery of human remains within the State of Alaska. Furthermore, if human remains are identified on federal lands, DOT&F shall adhere to federal laws and protocols in accordance with the Archaeological Resources Protection Act (ARPA, 16 USC 470) and NAGPRA (25 USC 3001 et seq.).

A. State (Alaska Statute) Laws

- 1. **AS 11.46.482(a)(3):** Applies to all lands in Alaska; makes the “intentional and unauthorized destruction or removal of any human remains or the intentional disturbance of a grave” a Class C felony.
- 2. **AS 12.65.5:** Requires immediate notification of a peace officer of the State (police, Village Public Safety Officer, or AST) and the SME when death has “been caused by unknown or criminal means, during the commission of a crime, or by suicide, accident, or poisoning.” The AST has interpreted notification procedures as applicable to all remains, including ancient remains. In addition to a local peace officer (if within a local jurisdiction), notification should include the AST Criminal Investigation Bureau.
- 3. **AS 41.35.200:** Applies only to State lands; makes the disturbance of “historic, prehistoric and archeological resources” (including “graves”) a Class A misdemeanor.
- 4. **AS 18.50.250:** Requires the issuance of burial-transit and disinterment and re-interment permits by the State Registrar of Vital Statistics or an authorized local registrar under certain circumstances.

B. Federal (United State Code) Laws

- 1. **16 USC 470 (ARPA):** Prohibits the unauthorized destruction or removal of archaeological materials, including human remains that are 100 years old

or older on federal lands and federal trust lands. Violations may be prosecuted as a misdemeanor or felony, as warranted by the severity of the violation. Violations of State or local laws, regardless of land ownership, may be prosecuted under ARPA if the archaeological materials are transported across State boundaries.

2. **25 USC 3001 et seq. (NAGPRA):** Governs the treatment and disposition of human remains on federal or federal trust lands that are determined to be Native American. NAGPRA also applies to Native American human remains from any lands if the remains are curated in an institution that receives federal funds.

VIII. Contact Information for Agency and Tribal Officials Involved with Human Remains Consultation

State Medical Examiner

Operations Administrator 4500
South Boniface Parkway
Anchorage, AK 99508-1264
Phone No: (907) 334-2202
Fax: (907) 334-2216

Type text here

Alaska State Troopers

Missing Persons Bureau 5700
East Tudor Road Anchorage,
AK 99507
Phone No: (907) 269-5058
Fax: (907) 248-9834

Alaska Bureau of Vital Statistics

Section Chief
Supervisor of the Anchorage Bureau
3601 C Street, Suite 128
Anchorage, AK 99503
Phone No: (907) 465-8643
Fax: (907) 465-4689

DOT&PF

Central Region Environmental Manager
P.O. Box 196900
Anchorage, AK 99519-6900
Phone No: (907) 269-0542
Fax: (907) 243-6927

Central Region Cultural Resources Specialist

P.O. Box 196900
Anchorage, AK 99519-6900
Phone No: (907) 269-0534
Fax: (907) 243-6927

Federal Highways Administration

Statewide Programs Team Leader
P.O. Box 21648
Juneau, AK 99802
Phone No: (907) 586-7428

Office of History and Archaeology

State Historic Preservation Officer and
State Archaeologist
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501
Phone No: (907) 269-8700

Alexander Creek, Inc.

President
8128 Cranberry Street
Anchorage, AK 99502
Phone No: (907) 242-0263
Email: aci@gci.net

Chickaloon Native Village

P.O. Box 1105
Chickaloon, AK 99674-1105
Phone No: (907) 745-0749
Fax No: (907) 745-0709
E-mail: cadmin@chickaloon-nsn.gov

Cook Inlet Region, Inc.

Senior Director, Land and Resources
P.O. Box 93330
Anchorage, AK 99509
Phone No: (907) 263-5604
Fax: (907) 279-8836

Eklutna Inc.

16515 Centerfield Drive, Suite 201 Eagle
River, AK 99577
Phone: [907-696-2828](tel:907-696-2828)
Fax: [855-615-2824](tel:855-615-2824)
Email: info@eklutnainc.com

Kenaitze Indian Tribe

Executive Director
P.O. Box 988
Kenai, AK 99611
Phone No: (907) 335-7200

Knik Tribal Council

P.O. Box 871565
Wasilla, Alaska 99687-1565
Phone No: (907) 373-7991
Phone No: (907) 373-2161

Knikatnu Inc.

165 E Parks Hwy Ste 201
Wasilla, AK 99654
Phone: (907) 376-2845

Native Village of

Eklutna 26339 Eklutna
Village Rd. Chugiak,
Alaska 99567

Phone : (907) 688-6020
Fax : (907) 688-6021

Native Village of Tyonek

PO Box 82009
Tyonek, AK 99682
Phone No: (907) 583-2201

Tyonek Native Corporation

880 H Street, Suite 210
Anchorage, AK 99501-5131
(907) 272-0707

Appendix G

Discovery Plan

I. Purpose and Scope

The Cultural Resources Discovery Plan (Discovery Plan) describes the general procedures and protocols for coordination in the event of an inadvertent discovery of cultural resources during the construction of the West Susitna Access Road Project (Project). The Discovery Plan outlines procedures to be followed if previously unidentified cultural resources are encountered after the Section 106 process has been completed or if inadvertent effects to historic properties occur during Project construction.

This Discovery Plan is intended to address typical cultural resources that are most likely to be discovered during ground-disturbing activities. Discoveries can also take other forms, including activities that go beyond permitted boundaries and encroach upon a historic property or an unevaluated site, and/or activities that cause unexpected indirect effects (e.g., physical, visual, audible, or atmospheric effects) to a historic property.

II. Cultural Resources and Historic Properties

For the purposes of this document, cultural resources refers to any archaeological sites; buildings; engineered structures; Alaska Native features and artifacts: round or rectangular structural pit features, basketry, projectile points, stone tools, hearths, grinding rock features, concentrations of modified bone, horn and antler, beads, cache pits, fire-cracked rock, pottery, shell ornaments, cultural landscape features, and culturally modified trees; and historic-era features and artifacts: building foundations, mining features, farming and homesteading features, glass bottles, ceramics, metal artifacts, and tin cans. Visible indications of cultural resources may be observed during construction in backhoe trenches, spoil piles, cleared ground surfaces, and vegetation clearing, among other actions.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), historic properties are any prehistoric or historic district, site, building, structure, object, or traditional cultural property included in or eligible for inclusion in the National Register of Historic Places (National Register; 36 Code of Federal Regulations [CFR] 800.16(l)(1)). In other words, a historic property is a cultural resource that has been determined to be eligible for listing in the National Register.

III. Human Remains and Objects of Cultural Patrimony

- A. If human remains or cremated human remains are encountered, treat them with dignity and respect and follow the protocols outlined in Programmatic Agreement (PA) Stipulation VI, *Treatment of Humans Remains*, and Appendix F, *Human Remains Protocol*.

- B. Should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (NAGPRA; 25 United States Code 3001 et seq.) be encountered, the Alaska Department of Transportation and Public Facilities (DOT&PF) shall immediately notify the landowner or land managing agency and all Signatories and proceed in accordance with PA Stipulation VIII, *Inadvertent Discoveries and Unanticipated Effects to Historic Properties*, and this Appendix G, *Discovery Plan*.

IV. Professional Qualifications and Standards

Cultural resources investigations conducted under the terms of the Discovery Plan will be carried out by or under the direct supervision of a person or persons meeting at a minimum the Secretary of the Interior's (SOI's) *Professional Qualifications Standards* (36 CFR 61, Appendix A) with expertise in the appropriate field(s). Additionally, all documentation, evaluation, treatment, and reporting of cultural resources as described for these procedures will follow and meet current professional standards and the SOI *Standards and Guidelines for Archaeology and Historic Preservation* (48 Federal Register [FR] 44716).

V. Prior to Construction Activities

Though a project site may have been thoroughly investigated for cultural resources prior to any construction activities, there is always the possibility that cultural resources and/or human remains will be inadvertently discovered or historic properties inadvertently affected during ground-disturbing activities. In the event that buried cultural deposits and/or human remains are inadvertently discovered or historic properties inadvertently affected during Project activities, work must stop immediately at the discovery site until a professional archaeologist can determine the nature of the discovery or effects, and consult with the Signatories to this PA.

Prior to any on-site Project activities, particularly ground-disturbing activities, construction personnel and any contractors will be briefed by DOT&PF on procedures to follow if buried human remains or cultural resources are encountered, or historic properties are affected. Please refer to Appendix C, *Monitoring Plan*, of the PA for detailed information on cultural resources awareness training for construction personnel and subcontractors.

VI. Protocols at the time of Discovery of Cultural Resources or Effects to Historic Properties

The steps outlined below will be taken by the appropriate responsible parties in the event that unanticipated cultural resources are encountered or affected.

A. On-Site Construction Contractor Responsibilities

Step 1: Stop Work at Discovery Site. If a cultural resource is inadvertently discovered or historic property is affected during the Project, ground-disturbing activities will be halted in an area large enough to ensure that the integrity of the

find is not compromised and to ensure safety of archaeological staff investigating the find. If the Contractor’s Archaeological Monitor is on site, they shall define the size of the stop work buffer area at their discretion and may expand this area to provide additional working areas or added margin for safety as deemed necessary in consultation with the Contractor’s on-site Construction Supervisor. The Contractor’s Archaeological Monitor may request fencing or other materials to define the boundary of the buffer area.

If the Contractor’s Archaeological Monitor is not present when the cultural resource is discovered or historic property affected, the Construction Contractor shall be responsible for securing and protecting the discovery and shall cease all work within a minimum two hundred (200)-foot buffer. Exposed cultural resources will be covered for protection. The location of the cultural resource will not be revealed to the public or any other unauthorized personnel.

Construction activities may continue elsewhere in the Project area. No further work may be conducted at the discovery site until the DOT&PF Project Engineer provides authorization to resume Project construction activities. DOT&PF shall be responsible for enforcing that no vehicles, equipment, and unauthorized personnel be permitted to traverse the inadvertent discovery or affected historic property.

Step 2: Notify the DOT&PF Project Engineer. The Construction Contractor shall immediately notify the DOT&PF Project Engineer regarding the inadvertent discovery or effect to a historic property. If the Project Engineer cannot be reached, contact the DOT&PF Professionally Qualified Individual (PQI)¹ and/or the Regional Environmental Manager (REM). DOT&PF staff shall make all other calls and notifications.

B. DOT&PF Project Engineer Responsibilities

Step 1: Ensure Protection of Discovery Site. The DOT&PF Project Engineer is responsible for taking appropriate steps to protect the discovery site. All work will stop in an area adequate to provide for the security, protection, and integrity of the cultural resource.

Step 2: Direct Construction Elsewhere from Discovery Site. The DOT&PF Project Engineer may direct construction away from cultural resources to work in other areas prior to contacting the PA Signatories.

Step 3: Notify the DOT&PF Central Region REM and PQI. The DOT&PF Project Engineer shall immediately notify the DOT&PF Central Region REM and PQI with location and all pertinent details regarding inadvertent discoveries or effects.

C. DOT&PF PQI Responsibilities

¹ The PQI is an SOI-qualified DOT&PF Cultural Resources Specialist.

Step 1: Identify Discovery. The PQI shall coordinate with the DOT&PF Project Engineer to ensure that an SOI-Qualified Archaeologist and Tribal Monitor examine the discovery to determine the nature and extent of the cultural resource or assess the effects to the historic property.²

- If the discovery is determined to not be a cultural resource or that no effects occurred to a historic property, the PQI shall notify the DOT&PF Project Engineer, and work may proceed with no further delay.
- If it is determined to be a cultural resource, if the discovery potentially represents human remains, or if effects to a historic property have occurred, the PQI shall notify the DOT&PF Project Engineer. No Project activities may occur at the discovery site until the PQI provides the Project Engineer with approval to resume activities.

Step 2: Notify PA Signatories and Other Consulting Parties.

The PQI shall notify the PA Signatories and Consulting Parties, as appropriate, each time there is an inadvertent discovery of cultural resources or an unanticipated effect to a historic property. The PQI shall be responsible for contacting these parties within forty-eight (48) hours of the discovery in accordance with 36 CFR 800.13(b)(3). The PQI shall provide a preliminary assessment of National Register eligibility of the discovery and proposed actions to avoid, minimize, or resolve any adverse effects. In accordance with 36 CFR 800.13(b)(3), the PA Signatories and Consulting Parties shall have forty-eight (48) hours to respond to the notification of the new discovery.

The DOT&PF PQI shall be the point of contact for all consultation with the PA Signatories and Consulting Parties each time there is an inadvertent discovery of cultural resources or an unanticipated effect to a historic property to ensure that the previously unidentified resource or unanticipated effect is evaluated, and that appropriate avoidance or minimization measures are implemented, or that a treatment plan is developed.

VII. Documentation of the Discovery

A. Documentation

The PQI and an SOI-Qualified Archaeologist shall ensure the proper documentation and assessment of inadvertently discovered cultural resources or affected historic property in consultation with the PA Signatories and Consulting Parties each time an inadvertent discovery or adverse effect occurs.

1. The PQI or the SOI-Qualified Archaeologist shall record relevant cultural material at the discovery site in accordance with professional standards. Site

² The SOI-Qualified Archaeologist may be the DOT&PF PQI or may be a qualified consultant under contract either with DOT&PF or the Knik Tribe. The Project Engineer and the PQI shall coordinate to procure cultural resources services for the investigation and documentation of the discovery.

overviews, features, and artifacts will be photographed, and stratigraphic profiles and soil/sediment descriptions will be prepared for subsurface exposures. Inadvertent cultural resource discoveries or affected historic properties will be documented on scaled site plans and site location maps. Additionally, they will be recorded using Global Positioning Systems (GPS) units with sub-meter recording capabilities. Subsurface testing may be conducted through test probes to determine the extent of subsurface deposits or to delineate boundaries as necessary.

2. All artifacts collected from the surface and test probes will be analyzed and catalogued. Artifacts will be curated in accordance with PA Stipulation IX, *Curation*, and Appendix H, *Curation Plan*.
3. Within five (5) business days of concluding fieldwork, the SOI-Qualified Archaeologist shall provide the PQI and DOT&PF Project Engineer a summary memorandum describing the documentation of inadvertent discoveries or affected historic properties, and management recommendations. DOT&PF shall consult with the PA Signatories and Consulting Parties on the summary findings.
4. The SOI-Qualified Archaeologist shall produce a technical report, consistent with the SOI *Standards and Guidelines for Archaeological Documentation* (48 FR 44734–44737), and the State of Alaska Office of History and Archaeology *Standards and Guidelines for Investigating and Reporting Archaeological and Historic Properties in Alaska*, describing the documentation of inadvertent discoveries or affected historic properties, and the resultant cultural resources investigation, and provide the report to the PQI. The PQI shall consult with the PA Signatories and Consulting Parties on the report findings as appropriate.
5. If it is determined in consultation between the PA Signatories and Consulting Parties that the discovery is not eligible for inclusion in the National Register or effects did not occur to a historic property, no further analysis is warranted, and the DOT&PF Project Engineer may authorize construction activities to resume at the discovery site.

VIII. Evaluation and Treatment

The PQI and an SOI-Qualified Archaeologist shall ensure that any evaluation and treatment of inadvertent discoveries or affected historic properties occurs in consultation with the PA Signatories and Consulting Parties.

- A. In the event that inadvertent discoveries or affected historic properties cannot be avoided by Project activities, the discovery will be treated as eligible for inclusion in the National Register.

B. If the discovery cannot be avoided by Project activities, it will be treated as if adversely affected by the Project pursuant to 36 CFR 800.5(d)(2) in consultation with the PA Signatories and Consulting Parties. The resource will be treated in accordance with PA Stipulation VI, *Treatment Measures*, and Appendix D, *Treatment Plan*.

C. Should data recovery be required, it will be implemented prior to any continued construction at the discovery site.

1. All artifacts collected as part of the treatment plan will be curated in accordance with PA Stipulation IX, *Curation*, and Appendix H, *Curation Plan*.
2. Once data recovery activities are complete, the PQI shall coordinate with the DOT&PF Project Engineer and the Signatories on the authorization for construction activities to resume at the discovery site.

IX. Proceeding with Construction

Project construction outside the discovery site may continue as directed by the DOT&PF Project Engineer and Construction Contractor while documentation and assessment of the inadvertent discoveries or affected historic properties at the discovery site proceeds. When the PQI ensures that the protocols outlined in this plan have been followed and that compliance with State and federal cultural resources laws has been completed, the DOT&PF Project Engineer may allow construction at the discovery site to resume.

Appendix H
Curation Plan

Per Stipulation IX.A - The DOT&PF will accession to the University of Alaska, Museum of the North (“UAMN”) all artifacts, faunal remains, and/or samples collected, along with photographs, video, field notes, and related materials recovered by archaeologists or during Project activities on SOA-owned or controlled land. The DOT&PF has a standing curation agreement with the UAMN (copied below).

Appendix 3

**MEMORANDUM OF UNDERSTANDING
BETWEEN
THE DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
AND
THE UNIVERSITY OF ALASKA MUSEUM OF THE NORTH
FAIRBANKS, ALASKA**

THIS MEMORANDUM OF UNDERSTANDING (Agreement) is hereby entered into by and between the Alaska Department of Transportation and Public Facilities (DOT&PF) Statewide Environmental Office, representing the three DOT&PF regions (i.e., Central, Northern, and Southeast), and the University of Alaska Museum of the North, Fairbanks, Alaska, herein referred to as the Museum.

WHEREAS, the purpose of this Agreement is to provide the framework for the effective museum curation and storage of cultural material collected or excavated during the development of DOT&PF sponsored projects in accordance with the stipulations outlined below.

WHEREAS, the DOT&PF administers federally funded projects that are subject to Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800 Protection of Historic Properties) and State funded projects subject to the Alaska Historic Preservation Act of 1970 (specifically AS 41.35.070 Preservation of Historic, Prehistoric, and Archaeological Resources Threatened by Public Construction); and

WHEREAS, the development of said projects can result in certain cultural material recovered during archaeological survey, excavation, and data recovery, and the creation of associated field records (herein called Collections); and

WHEREAS, DOT&PF as the sponsor for federal and State funded projects has the responsibility under federal and State law to ensure proper care of Collections; and

WHEREAS, the Museum is an accredited institution that has requisite facilities that meet and operate in accordance with the federal standards published in 36 CFR 79 to provide physical security and a controlled environment for Collections, has an established Collection Management Policy that provides procedures and requirements to curate archaeological collections for future research, exhibit, and instruction, and has qualified Museum professionals with the expertise for the curation of Collections; and

WHEREAS, the Parties hereto recognize the mutual benefits to be derived by having Collections from DOT&PF suitably housed and maintained by the Museum; and

WHEREAS, the Parties hereto recognize the continued State legal title to Collections from lands owned or controlled by the State (pursuant to AS 41.35.020 and 11 AAC 16.020) and the responsibility to ensure that the Collections are suitably managed and preserved for the public good; and

WHEREAS, the Parties hereto recognize that DOT&PF sponsored surveys and archaeological excavations on properties not owned or controlled by the State require a separate Right-of-Entry agreement with the land owner or managing entity; and

WHEREAS, Right-of Entry agreements will identify the party holding legal title to the cultural materials, and contain terms and conditions to ensure proper care and curation of any recovered Collections; and

NOW THEREFORE, the DOT&PF and the Museum as signatories to this Agreement mutually agree to promote a unified approach to preservation and protection of cultural materials in accordance with the following stipulations until this Agreement expires or is terminated.

STIPULATIONS

I. RESPONSIBILITIES

A. The Museum

1. In accordance with the Museum's Collections Management Policy, the Museum agrees to act as repository for appropriately accessioned and cataloged cultural material, and to provide proper space, facilities and personnel for curation, storage and maintenance of the materials.
2. Collections made on State lands remain the property of the State, while the Right-of-Entry agreements will contain the terms and conditions of Collections from properties not owned or controlled by the State. The Museum shall not transfer or discard a State Collection without written permission of the State. The Museum may not sell any State Collection.
3. The Museum assumes no responsibility for cultural specimens from DOT&PF sponsored projects that have not been accessioned and cataloged according to the Museum's Curation Guidelines accession system and that have not been physically deposited in the Museum. The Museum reserves the right to refuse to accept a Collection.

B. The DOT&PF

1. In accordance with the Museum's Curation Guidelines, the DOT&PF will be responsible to coordinate with the Museum for the proper accessioning and cataloging and processing for long-term museum storage of Collections from DOT&PF sponsored projects that are to be deposited with the Museum. This will be accomplished by a qualified consultant(s) under contract to the DOT&PF.
2. All associated records will be deposited at the Museum at the same time as the Collection(s). These records will include (but not necessarily be limited to) catalog ledgers and copies of all reports, papers, field notes, photographs, profiles, etc. In accordance with applicable federal and State laws, the Museum will restrict access to information about the location of heritage resource sites from which DOT&PF Collections are obtained.

II. ADMINISTRATION

- A. **Duration of Agreement:** The Agreement shall remain in effect for a period of ten (10) years after the date it takes effect. The Museum and the DOT&PF will review this Agreement in five (5) years and make any necessary adjustments unless it is terminated prior to that time. If there are no objections from the parties, the term of the Agreement will automatically be extended for an additional ten (10) years. The procedures, terms and conditions of this Agreement may be modified at any time by joint written consent of the parties.
- B. **Fees:** The DOT&PF and the Museum recognize that fees will be required for the DOT&PF sponsored Collections when they are transferred for deposition and organization at the Museum. The fees for these services will be in accordance with the Museum's Curation Guidelines.
- C. **Amendment:** Parties to this Agreement may at any time propose amendments, whereupon the parties will consult to consider such amendment. This Agreement may be amended only upon written concurrence of the signatory parties. Amendments go into effect on the date of the last signature.
- D. **Termination:** This Agreement becomes effective when final signature is received. A party may terminate this Agreement at any time by giving written notice to the other parties not less than one hundred twenty (120) days in advance of the effective date of termination. If any party proposes termination of this Agreement, the party proposing termination will consult with the other parties to seek alternatives to termination. Should such consultation result in an agreement on an alternative to termination, the parties will proceed in accordance with that agreement.

THE PARTIES HERETO have executed this Memorandum of Understanding.

UNIVERSITY OF ALASKA MUSEUM, FAIRBANKS

By:  Date: 1/27/14
Josh Reuther, Ph.D., Curator of Archaeology

By:  Date: 1/27/14
Aldona Jonaitis, Ph.D., Museum Director

By:  Date: 1/31/14
Rosemary Madnick, Grant and Contract Services Director

ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

By:  Date: 12/12/13
Roger Healy, P.E., Chief Engineer

West Susitna Access Project – Programmatic Agreement
State Number CFHWY01209 Federal Number 0001795

According to Stipulation II.A., "The Museum and the DOT & PF will review this Agreement in five (5) years and make any necessary adjustments unless it is terminated prior to that time. If there are no objections from the parties, the term of the Agreement will automatically be extended for an additional ten (10) years. The procedures, terms and conditions of this Agreement may be modified at any time by joint written consent of the parties."

THE PARTIES HERETO have reviewed the Agreement and have no objections to the 10 year extension of this Memorandum of Understanding, from the 5-year review mark of January 31, 2019, to January 31, 2029.

UNIVERSITY OF ALASKA MUSEUM, FAIRBANKS

By:  _____ Date: 4/20/19
Joshua D. Reuther, Ph.D., Curator of Archaeology

By:  _____ Date: 4/22/19
Patrick S. Druckenmiller, Ph.D., Museum Director

By:  _____ Date: 5/1/19
~~Rosemary Madnick, Grant and Contract Services Director~~
Rosemary Madnick, Executive Director
Office of Grants & Contracts Administration

ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

By:  _____ Date: 3-29-19
Kenneth J. Fisher, P.E., Chief Engineer

Dec. 7, 2013 MOU Between DOT&PF and UA Museum

Appended signature page March 2019

Appendix I
Amendment Log

Per Stipulation XII.D. Amendment Documentation

The DOT&PF will document all amendments to the PA in Appendix I, *Amendment Log*. The DOT&PF will provide revised versions of this PA or PA appendices to the Consulting Parties within 30 days of finalization, unless otherwise noted or agreed upon by the Signatories.

No.	Amendment	Approval Date
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Appendix J

Reporting and Deliverables Table

West Susitna Access Road Project– Human Remains Protocol
State Number CFHWY01209 Federal Number 0001795

Report Title	Submittal Date	Report Content	Signatory Review Period	Consulting Party Review Period	DOT&PF Response Period
Annual PA Report	On or before January 31st	Progress on design, construction, identification, monitoring, collection, curation, issues, evaluations, Annual Treatment Report (PA X.A)	90 Calendar Days	90 Calendar Days	30 Calendar Days
Annual Archaeological Fieldwork Report	Within 6 months following completion of fieldwork	(PA IV.B)	30 Calendar Days. 60 Calendar Days if report exceeds 100 pages	30 Calendar Days. 60 Calendar Days if report exceeds 100 pages	90 Calendar Days
Ethnographic Deliverables	TBD	TBD	TBD	TBD	TBD
Data Gap Analysis					
Draft research design					
Outstanding Appendices	As appropriate	n/a	At least 15 Days; 30 Day First and Last Review	At least 15 Days; 30 Day First and Last Review	
Historic Trail Survey		(PA IV.E.a)			
Historic Build Environment Survey		(PA IV.D.a)			
Monitoring Training Materials	Within 3 months following execution of PA	(PA VI.F.4)	SHPO & Tribal Governments 30 Day Review	SHPO & Tribal Governments 30 Day Review	
End of Project Treatment Report					

Appendix K
Consulting Parties

Reserved



United States Department of the Interior



NATIONAL PARK SERVICE

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

May 6, 2026

MatSu Borough Historic Preservation Commission
Board Members
350 East Dahlia Ave.
Palmer, Alaska 99645

To Whom it Concerns,

This letter is intended to introduce you to the projects proposed for planning or implementation in 2026 within the boundaries of Denali National Park and Preserve (DENA). The proposed projects require review and consultation under National Historic Preservation Act (NHPA). Section 106 of the NHPA requires Federal agencies to consider the effects of their undertakings on historic properties. This letter is sent to you as a consulting party as defined in 36 CFR 800.2(c)(2).

Attached along with this letter is a document containing a list with brief project descriptions, location information, and NHPA assessments for approximately 100 proposed projects for your review. Multi-year projects are noted with a date range in the title, and some of these may already be underway. Please provide any comments or requests for further engagement on any of these projects within 30 days of receipt of this letter. There may be additional projects that require NHPA review later this year as well. If so, we will contact you on a case-by-case basis.

I look forward to working with you to ensure that our land management activities thoroughly consider and address your concerns. If you would like to be a consulting party, desire more information, or have any questions about these projects, please contact Jakara Hubbard at (907) 683-6241 or DENA_compliance@nps.gov.

Sincerely,

Brooke Merrell
Superintendent

Attachment: "2026 List of Proposed Projects at Denali for Consultation"
Cc: DENA_compliance@nps.gov

Proposed Actions at Denali National Park and Preserve: National Historic Preservation Act (NHPA) Assessments of Effects

2026

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Visitor Resource Protection

1. Seasonal Installation of two FAA Weather Cameras, Kahiltna Glacier (2022-2026)

Description: The NPS would continue to permit seasonal installation and removal of two weather cameras on the Kahiltna Glacier. The cameras are located outside of designated wilderness at ~6,200-foot (1,890 m) on the Kahiltna Glacier, proximate to the Kahiltna Ice fall, on the flank of the southernmost spur of the West Ridge of Mount Hunter (see coordinates below). The cameras provide near real time weather information for pilots and NPS staff to make accurate go/no-go decisions for aviation operations. This information would also be made available, via the FAA website, to the public. The size of the temporary weather camera/station is about 3 square meters (32.3 square feet).

Location: Kahiltna Glacier (62° 55.91' N, 151° 12.84' W)

NHPA Assessment of Effect: No Potential to Cause Effect.

2. Backcountry Use Monitoring with Trail Counters and Cameras (2022-2026)

Description: The NPS would continue to monitor indicators and standards identified in Denali's 2006 Backcountry Management Plan (BCMP) to assess important Resource and Social Conditions related to wilderness character and the visitor experience. Monitoring in 2026 may include the seasonal installation of infrared trail counters at 10-20 rotating sites on formal and informal trails in the frontcountry and backcountry, including in Wilderness areas. Year-round installations would be maintained at Horseshoe Lake and on the east side of the Savage Alpine Trail, near Mountain Vista. Counters would be camouflaged and hidden from view as much as possible.

Location: Throughout the park

NHPA Assessment of Effect: No Adverse Effect.

3. Denali National Park and Preserve Superintendent's Compendium Update

Description: The NPS would continue to annually update the Superintendent's Compendium. The Compendium is the summary of park specific rules implemented under the discretionary authority of the park Superintendent that addresses designations, closures, permit requirements, and other restrictions and/or specifications imposed under the discretionary authority of the superintendent. Proposed changes for 2026 include 36 CFR 1.6(f) and 13.50 (filming, still photography, and audio recording permits and restrictions), and 2.2(d) (conditions and procedures for transporting lawfully taken wildlife through park areas). All changes are subject to a 30-day public comment period.

Location: Throughout the Park.

NHPA Assessment of Effect: No Potential to Cause Effects

4. Maintenance of Telecommunication Facilities in DENA Wilderness

Description: The NPS would continue to perform cyclic maintenance and necessary upgrades of mission critical equipment at existing radio repeater sites in Denali National Park and Preserve. Most sites are accessed by helicopter. In 2026, work to replace failing radio repeater components and shelters is expected to occur at Thorofare, Tokosha, and Cantwell repeater sites. This work may require some ground disturbance at the Thorofare site. Maintenance work is also expected at East Branch, Savage, and Thorofare repeater sites.

Location: Existing radio repeater sites throughout the park.

NHPA Assessment of Effect: No Adverse Effect.

5. Removal of Downed Aircraft from Glaciated Environments (2020-2029)

Description: The NPS would continue to remove non-historic materials including downed aircraft, as needed, from glaciated areas of Denali National Park and Preserve. Such removal efforts may require a variety of actions, including but not limited to overnight stays by removal personnel, use of fixed wing aircraft, use of helicopters for sling loads, and helicopter landings. Actions taken under this authorization would be reviewed and approved by the Superintendent on each occasion.

Location: Glacial environments throughout the Park

NHPA Assessment of Effect: No Adverse Effect.

6. Kennels Yard Shading and Lighting: Animal Care Improvements

Description: This project would continue to improve the health, safety, and welfare of the Denali sled dogs and kennels staff by installing temporary shade nets in the dog yard in summer and lighting in winter. In 2025, five poles were installed down the centerline of the dog yard and three poles along the fenced pens to be used for the dual purpose. In 2026, NPS proposes to complete the trenching needed for the electric utility connections and the installation of historic-style lighting. An archeological monitor would be required during ground disturbance.

Location: Denali National Park Kennels

NHPA Assessment of Effect: To Be Determined.

7. Kennels Doghouse Replacement: Animal Care Improvements

Description: The NPS proposes to improve the health, safety, and welfare of the Denali sled dogs and kennels staff by replacing the existing doghouses with newly designed doghouses. The new design would improve the size, insulation, and operational safety and efficiency of the doghouses, while still incorporating the historic character of previous designs.

Location: Denali National Park Kennels

NHPA Assessment of Effect: To Be Determined.

8. Kennels UTV, ATV, and Non-motorized Cart Use for Training (2026-2030)

Description: The NPS would continue to use non-motorized wheeled carts, motorized Utility Task Vehicles (UTV), and All-Terrain Vehicles (ATV) on established frontcountry trails and roads for training the park sled dogs. This expanded terrain provides more varied opportunities for training and exercise when environmental conditions are not adequate for the use of sleds. Use occurs no earlier than the conclusion of dog demonstrations and bus services (mid-Sept) and no later than April 15.

Location: Trails and roads in the park entrance area including Riley Creek Campground, Denali Visitor Center campus, Denali Bus Depot, Roadside Bike Trail, INR Airstrip perimeter.

NHPA Assessment of Effect: No Potential to Cause Effects.

9. Mountain Vista Footbridge

Description: The NPS proposes to leave the footbridge near Mountain Vista in place year-round as a permanent installation in wilderness. As part of the Winter and Shoulder Season EA (2020), the bridge was seasonally installed and removed every year. However, several incidences of staff injuries have occurred during the process, and this practice is no longer safe or feasible. Bridge improvements would be made to protect the durability of the structure and reduce future maintenance needs.

Location: Winter trail near Mountain Vista.

NHPA Assessment of Effect: No Potential to Cause Effects

10. BearSaver Locker Installations at Roadside Cabins

Description: The NPS proposes to install BearSaver lockers at three historic cabins along the Park Road to provide year-round wildlife-resistant food and equipment storage. Currently, food is stored outside of these cabins in Knaack boxes, which are not designed for this purpose and have developed issues that prevent the boxes from being properly secured from animals. The lockers would be installed out of the historic viewshed of the cabins and would require archeological monitoring during ground disturbance.

Location: Upper Toklat, Thorofare, and Wonder Lake

NHPA Assessment of Effect: No Adverse Effect

11. Headquarters Flag Management and Lighting

Description: The NPS proposes to install a light fixture on the Headquarters flagpole to ensure that our flag display meets flag code. The variability of the daylength at this latitude and limited staff availability has made it difficult to consistently raise and lower the flag at sunrise and sunset during winter months. This flagpole is located within the McKinley Park Headquarters Historic District and has been in this location since 1926. The NPS would strive to achieve appropriate illumination that meets dark sky standards and minimizes compromising the historic integrity of the district.

Location: Park Headquarters

NHPA Assessment of Effect: To Be Determined

External Affairs

12. Issuance of Commercial Use Authorizations (2024-2028)

Description: The NPS would continue to issue new Commercial Use Authorizations (CUAs) which cause no more than minimal impact to park resources and values; to extend, renew, reissue, or modify previously approved CUAs not entailing new construction; to change or amend approved actions or plans involving CUAs; to renew CUAs not involving new environmental impact; and to approve other activities documented in CUA stipulations (fuel, storage, temporary shelters, transportation, navigation aids, etc). Previously approved activities include frontcountry guided hiking, guided winter activities, mountaineering, non-tour air transport, frontcountry camping, and dog sledding. CUAs are provided as one and two-year opportunities.

Location: Park wide

NHPA Assessment of Effect: No Adverse Effect.

13. Special Use Permit for construction of Guest Facilities at Rainy Creek (2025-2026)

Description: The NPS would continue to permit the activities requested by Hank Swan on behalf of the Kantishna Hills LLC (Kantishna property owners) who are constructing structures as part of a lodge facility on their three private parcels on Rainy Creek. Activities include the use of national park lands to stage equipment and construction materials, permission to use a helicopter to sling-load construction materials from two of the requested staging areas on NPS land to their property, brushing of roads and staging areas, and use of a snowmachine and groomer to create a fixed-wing aircraft winter landing strip on NPS land near their property and a snow machine trail stretching between Glen airstrip and Rainy Creek inholding property.

Location: Kantishna

NHPA Assessment of Effect: No Potential to Cause Effect.

14. Special Use Permits: Events, First Amendment, Filming, and Photography (2024-2028)

Description: The NPS would continue to issue Special Use Permits (SUP) for special park uses and events occurring within Denali National Park and Preserve. Activities that would be permitted include charity sporting events (road runs or bicycle events), weddings/ceremonies, military training exercises, first amendment activities, commercial filming, still photography, and other special events as approved by the Superintendent.

Location: Throughout the Park

NHPA Assessment of Effect: No Potential to Cause Effect.

15. Military Crash Site Reconnaissance, Eldridge Glacier (2023-2027)

Description: The NPS would continue to permit the Pacific Forces Regional Support Center at Joint Base Elmendorf-Richardson for annual helicopter (UH-60 Blackhawk) searches and landings on the Eldridge Glacier between May and October. The purpose of the activity is to conduct a reconnaissance to search for human remains or crash debris in the vicinity of 1952 crash site of USAF C-119 Boxcar, which is located in eligible wilderness. No installations would be permitted.

Location: Eldridge Glacier

NHPA Assessment of Effect: No Adverse Effect; project-specific consultation was sent in June 2022.

16. Greg LaHaie/Kantishna Air Taxi Land Use SUP 2025-2026

Description: The NPS would continue to permit Greg LaHaie (Kantishna property owner) to use NPS lands to park his personal vehicle year-round adjacent to the airstrip and to use an airplane tie-down area for storage of his airplane, small shed building, and a fuel supply. The fuel supply (Avgas) is in a 2,000-gallon double-wall fuel tank, vented, with overfill protection, and hoses disconnected.

Location: Kantishna airstrip

NHPA Assessment of Effect: No Adverse Effect.

17. Award of a Concession Contract for Guided Interpretive Hiking Services (2025-2034)

Description: The NPS would continue to permit Denali National Park Wilderness Centers, Ltd. (Camp Denali) to provide the following visitor services under the authority of Section 1307 of the Alaska National Interest Land Conservation Act: Guided interpretive hiking/trips (in the Kantishna area new park additions and in the former Mount McKinley National Park) and guided and unguided canoeing on Wonder Lake (including the storage of five canoes on Wonder Lake). Guided hiking/trips may include the following incidental activities: naturalist walks, photographic outings, bird watching, and/or gold panning. No overnight guided hiking is authorized under the contract.

Location: Kantishna

NHPA Assessment of Effect: No Potential to Cause Effects.

18. Yentna River Airstrips brushing: Special Use Permit (2025-2029)

Description: The NPS would continue to permit a CUA holder who operates a hunting guide service in the Yentna River areas of Denali National Preserve to perform brushing on and around the existing airstrip. This includes using gas-powered equipment to clear landing areas (up to 75 feet in width and 800 feet in length).

Location: Middle - East Fork Yentna River: N 62°26.714', W 151°55.710'; Upper - West Fork Yentna River: N 62°30.532', W 152°26.653'.

NHPA Assessment of Effect: No Potential to Cause Effects.

19. Access to Mountain House LLC: Special Use Permit (2025-2026)

Description: The NPS would continue to permit the Mountain House LLC (Robert and Marne Sheldon) to access their 4.99-acre private parcel, located on the Ruth Glacier. Specific SUP activities include the creation and use of two storage areas (15'x15' each), one adjacent to the Main (east) Ruth Glacier East Landing Strip ("Landing Zone Cargo Site") and another near the base of the private property ("South Nunatak Cargo Site"), and helicopter slingload operations to transport cargo from either site.

Location: Ruth Glacier

NHPA Assessment of Effect: No Potential to Cause Effect.

Facilities

20. Routine maintenance of historic / cultural sites, structures, objects, utilities, and grounds

Description: The NPS would continue to perform routine maintenance and repairs to historic and cultural structures, sites, utilities & grounds. Specific activities would be reviewed by the NHPA specialist before implementation and would not include activities that would cause an "adverse effect". Activities that involve ground disturbance may require an archeological monitor.

Location: Throughout the Park

NHPA Assessment of Effect: "No Adverse Effect", "No Historic Properties Affected", or "No Potential to cause effects".

21. Routine maintenance of non-historic structures, utilities, and grounds

Description: The NPS would continue to perform routine maintenance and repairs to existing non-historic structures, utilities, and grounds. Specific activities would be reviewed by the NHPA Specialist before implementation and would not include activities that would cause an "adverse effect". Activities that involve ground disturbance may require an archeological monitor.

Location: Throughout the Park

NHPA Assessment of Effect: "No Adverse Effect", "No Historic Properties Affected", or "No Potential to cause effects".

22. Kantishna Airstrip Routine Maintenance and Minor Upgrades (2024-2028)

Description: The NPS would continue to perform routine maintenance and minor upgrades on the Kantishna Airstrip, located at the western terminus of the Denali Park Road. Possible maintenance activities include vegetation management, in-kind regrading, or resurfacing; new construction or other major modifications to the airstrip are not included.

Location: Kantishna Airstrip

NHPA Assessment of Effect: No Adverse Effect.

23. Application of CaCl to Mitigate Dust on the Denali Park Road (2023-2027)

Description: The NPS would continue to mitigate dust on the Park Road to improve concessions operations and visitor experience, as well as to reduce maintenance needs. This project would apply a binding agent (calcium chloride) to the unpaved portion of the park road to reduce blowing dust and fine gravel loss. Dust detracts from the visitor experience and is a respiratory irritant. Dust also reduces the visibility on the park road, creating a safety hazard and decreasing the wildlife viewing opportunities.

Location: Along the unpaved portion of the Park Road (Mile 15-92)

NHPA Assessment of Effect: No Adverse Effect.

24. Denali Park Road Routine Maintenance and Repair (2023-2032)

Description: The NPS would continue to perform routine maintenance, repair, and operating activities on the Denali Park Road. Maintenance activities may include resurfacing, installing engineered materials within the road subgrade, and asphalt patches. Activities would not occur outside of the existing road prism and would strive to preserve the unique character of the Park Road Historic District.

Location: Denali Park Road

NHPA Assessment of Effect: No Adverse Effect.

25. Mitigate flood damage potential on Park Road

Description: The NPS would continue to mitigate potential road damage from flooding by periodically removing material from the intake and discharge areas of several culverts along the Park Road. Small to medium flood events during summer months have deposited an excess amount of material and partially filled the culverts, significantly reducing the flow and forcing water over the stream banks and onto the road. The removal of this material from the stream bed would be done to match the natural stream grade so that the water would reclaim the area and leave little or no long-term effect.

Location: Denali Park Road

NHPA Assessment of Effect: No Adverse Effect.

26. Trails Maintenance Plan (2024-2028)

Description: The NPS would continue to maintain existing trails, including historic trails, located within Denali National Park and Preserve as described in the associated “Trails Maintenance Plan”. Work may include brushing, the removal of downed vegetation, replacement of existing signs, “in kind” repairs to existing trail structures, re-grading, resurfacing, trail stabilization, and / or trail rehabilitation. This work would not include new trail construction, major trail reroutes, installation of new major trail features, or trail alterations that would change its character or trail class.

Location: Existing trails throughout the park

NHPA Assessment of Effect: "No Adverse Effect", "No Historic Properties Affected", or "No Potential to Cause Effects".

27. Reduce Roadside Vegetation to Increase Safety and Visibility (2022-2026)

Description: The NPS would continue to remove brush along the Park Road to improve road structure, eliminate a barrier to wildlife crossing, and enhance visibility and safety for drivers and visitors. This project would be limited to the vegetation that grows within 5 meters of either side of the road. Brush will either be hand cut using chain saws and a chipper and left on site or plucked by an excavator and hauled to a burn pile for disposal.

Location: Denali Park Road

NHPA Assessment of Effect: No Adverse Effect.

28. Nenana River Trails

Description: The NPS would continue to construct approximately 17 miles of trail along the Nenana River between Mile 231 and Mile 237 of the Parks Hwy. Of this total, approximately eight miles would be a crushed gravel multiuse trail open to both pedestrians and bicyclists. The other approximately nine miles would be a dirt hiking trail open to pedestrians only. In 2026, design is in progress for the multiuse trail and the construction of the hiking trail would continue. Construction of the multiuse trail would occur in 2026-2028, with the section within the AK DOT right-of-way expected to be constructed in 2029-2030.

Location: Tsenesdghaas Na' Trailhead to Riley Creek Day Use Area

NHPA Assessment of Effect: No Adverse Effect.

29. Wooden Shelter (Quinzee Huts) Winter and Summer Locations (2024 - 2028)

Description: The NPS would continue to temporarily place wooden shelters along the park road on a seasonal basis for administrative use. The huts would remain out of sight of the Park Road when not in use and would not be permanently placed where they are visible from the Park Road Historic District during summer visitor operations. There would be no new ground disturbance during hut placement.

Location: Along the Park Road

NHPA Assessment of Effect: No Adverse Effect.

30. Polychrome Area Improvements

Description: The NPS would continue to construct a 400-foot steel truss bridge over Pretty Rocks landslide and other engineered solutions in the Polychrome area of the Denali Park Road. In 2026, contractors would complete both phases of the project, including the bridge, a retaining wall near the bridge, installation of monitoring equipment, rock scaling, and a minor re-route of the Park Road near the Bear Cave landslide (mile 44.8). Project-specific NHPA consultation was sent in December 2021 and an agreement to mitigate the adverse effects was signed in March 2022.

Location: Mile 44-46 of the Denali Park Road

NHPA Assessment of Effect: Adverse Effect.

31. Ghiglione Bridge Replacement

Description: The NPS proposes to construct a 180-foot concrete and steel curved bridge with wooden rails, located 70 feet north of the existing Ghiglione bridge, closer to the original 1930s road alignment. The existing bridge would be demolished and removed at the end of the project. The existing bridge is a “Mission 66 Era” bridge that is a contributing feature to the Mount McKinley National Park Road Historic District. It has reached the end of its service life and was determined to be deficient by the Federal Highway Administration. Project-specific NHPA consultation was sent in July 2019 and a programmatic agreement to mitigate the adverse effect was signed in Aug 2020.

Location: Mile 42 of the Denali Park Road

NHPA Assessment of Effect: Adverse Effect

32.C- Camp Shower House Replacement

Description: The NPS proposes to construct a new shower house in the C-Camp employee residential area. The existing shower house was built in the 1970s and has now exceeded its service life. The new year-round shower house would include toilets, showers, a laundry room, and utility sink areas. The two cabins adjacent to the new shower house would be renovated to meet ADA requirements. The existing shower house would be demolished and removed. Construction would be completed concurrently with the fire dorm in 2026.

Location: Southeast of the Shaffer Building, on the north side of C-Camp.

NHPA Assessment of Effect: No Adverse Effect.

33. Construction of a Wildland Fire Management Housing Facility in C-Camp

Description: The NPS proposes to construct an eight-bedroom (single occupancy) dormitory facility in the c-camp residential area to support the Wildland Fire Program. The 3,340 square foot facility would include a communal living area, dining/kitchen area, shared bathrooms, showers, and a laundry room. It would be built for year-round use and would be connected to existing water, sewer and electrical systems at C-Camp. Construction would be completed concurrently with the shower house in 2026.

Location: North of the current resident parking lots, on the east side of C-Camp.

NHPA Assessment of Effect: No Adverse Effect.

34. Hazard Tree Removal

Description: The NPS proposes to develop a plan outlining the process and personnel engaged in hazard tree identification, risk assessment and prioritization, and removal and disposal methods. While this plan is in development, trees that are hazards to human safety or property would continue to be removed.

Location: Frontcountry Developed Area

NHPA Assessment of Effect: To Be Determined

35. Replace and Expand MSLC Winter Septic System

Description: The NPS proposes to replace the existing leach field and its associated appurtenances and piping. It would also remove and replace Manhole X, an intermediary manhole that diverts waste in the summer months to the lift station further south and to the leach field during the winter months to the east. The existing septic system located on the Murie Science and Learning Center (MSLC) campus in Denali's frontcountry currently provides wastewater treatment and disposal for four facilities during the winter and shoulder seasons when the Frontcountry Wastewater Treatment plant is not in operation (roughly September through May): The existing seasonally-operated wastewater disposal system has been determined to be undersized for the current and anticipated utilization.

Location: MSLC campus

NHPA Assessment of Effect: To Be Determined.

36. Geotechnical Investigation in Frontcountry Developed Area (2024-2028)

Description: The NPS would continue, as needed, to drill boreholes (up to 120 ft deep) and excavate test pits (approximately 5' x 8' x 15' deep) to collect geotechnical data and soil samples to inform the design of several upcoming infrastructure projects in the frontcountry developed area. Some boreholes would include instrumentation and a steel casing visible at the surface; others would be backfilled immediately. Off-road locations would use a tracked drill rig to minimize ground disturbance along the access route. The Cultural Resource Management Team would determine on a case-by-case basis if a survey or archeological monitor would be needed. In 2026, the following amendment to the Park Road Programmatic Agreement (regarding future actions that wouldn't require further consultation) is being proposed: to increase the borehole size from 8" in diameter to up to 16" in diameter.

Location: Frontcountry Developed Area

NHPA Assessment of Effect: No Adverse Effect.

37. Replace Roof and Repair Interior Damage at the Eielson Visitor Center

Description: The NPS proposes to replace the roof on the Eielson Visitor Center (EVC) and the supporting utility building, as well as make other repairs to the interior and exterior of the building. Originally constructed in 2008, water infiltration through the roof occurred annually during the spring melt, causing extensive damage. The intricate shape and design of the roof as a viewing platform with numerous penetrations is to blame, so the new roof would no longer be open to pedestrians and would no longer have skylights. The roof would still be vegetated with native plants to visually blend into the landscape. The damaged photovoltaic (solar) panels attached to the roof's south edge would be removed and the visitor center's energy needs would be met using a propane generator and the existing hydroelectric system. Construction would occur during 2027-2028; final design, compliance, and contract solicitation would be completed in 2026. The EVC would re-open to visitors in 2029.

Location: Mile 66 of the Park Road

NHPA Assessment of Effect: To Be Determined.

38. Stabilize Alaska Road Commission Basement on McKinley Airstrip

Description: The NPS proposes backfilling the underground cavity (approx. 15'x 15'x 10') discovered on the edge of the McKinley airstrip when mowing equipment broke through a portion of the ceiling in 2024. Cultural resource specialists determined that it was the basement or underground storage room of a former Alaska Road Commission building. Due to safety concerns and the need to stabilize the area, NPS would excavate the basement, remove the wooden cribbing, and fill the cavity with compacted material. Because the work may impact undisturbed soils, an archeological monitor would be required.

Location: McKinley Airstrip (INR)

NHPA Assessment of Effect: No adverse Effect.

39. Nenana River Pedestrian Bridge

Description: The NPS proposes to construct a bridge across the Nenana River, south of the Park entrance. The bridge would allow non-motorized travel between Denali Park Village and Tsenesdghaas Na' Trailhead. This infrastructure would be a safety improvement for both pedestrians and motorists, as an alternative to pedestrians crossing the river on the nearby highway bridge. Design and compliance are in progress in 2026, final design and compliance will be completed by 2027, and construction would begin in 2028.

Location: MP231 George Parks Highway

NHPA Assessment of Effect: To Be Determined

40. Administrative Camp Improvements

Description: The NPS proposes to upgrade the administrative-use temporary housing area in the entrance area of the park to address safety concerns. Upgrades include the addition of wildlife-resistant food storage lockers within the camp, the replacement of a weatherport shelter for a group dining area, and the installation of a sign on the camp access road for visitor awareness that public entry is prohibited. Work that impacts previously undisturbed ground would require an archeological monitor.

Location: Administrative Camp west of Riley Creek Campground.

NHPA Assessment of Effect: No Potential to Cause Effects

41. Toklat Gravel Scrape (2026-2031)

Description: The NPS would continue to extract up to 22,200 cy gravel biennially from the Toklat River bar to be processed and stored at Toklat Road Camp for use in Park Road construction projects and road maintenance activities. In 2026, this work would be completed by a contractor. The extraction activities would be visible from the Park Road Historic District but would occur in a naturally disturbed area that would be reclaimed by the river within a few years.

Location: Toklat River and Toklat Road Camp (Mile 53 of the Park Road)

NHPA Assessment of Effect: No adverse effect

42. Stampede Airstrip Cyclic Brushing

Description: The NPS proposes to remove vegetation from the historic Stampede Airstrip to maintain safe aircraft access and landing conditions. The airstrip would be cleared of brush and woody vegetation within the landing surface and immediate edges, maintaining the existing footprint of the airstrip. Brushing would reoccur on a three-year maintenance cycle to prevent significant brush encroachment and reduce the need for more intensive clearing in the future. Brushing activities would use power tools and cut brush would be dispersed. Work crews would camp on site for multiple days.

Location: Stampede Air Strip (63°44'56.41"N, 150°19'44.47"W)

NHPA Assessment of Effect: No adverse effect

43. Park Headquarters Permanent Housing Expansion

Description: The NPS proposes constructing ten new ADA-compliant year-round housing units for staff in the Denali Park Headquarters area (two single-bedroom duplex units and three two-bedroom duplex units). Work would also include site preparation, construction of road access, and installation of utilities. Construction would occur on previously disturbed grounds outside of, but adjacent to, the Mount McKinley National Park Headquarters Historic District. Design and compliance are ongoing in 2026, with an Environmental Assessment to be completed in 2027.

Location: Park Headquarters

NHPA Assessment of Effect: To Be Determined

44. Improved Addressing for Emergency Response to Park Buildings

Description: The NPS proposes to improve emergency response to park housing units and administrative buildings by designating consistent identification numbers and displaying them on the exterior of each structure, including within the Headquarters Historic District and the Park Road Historic District. The appearance of the addressing numbers would meet current safety codes.

Location: Frontcountry Developed Area

NHPA Assessment of Effect: To Be Determined

45. Replacement of Teklanika Field Camp Structures

Description: The NPS proposes to replace six wall tents and a group yurt at the Teklanika Campground Field Camp with six hard-sided ADA-compliant sleeping huts and a new yurt. The former structures would be removed. The huts would be built through the local School-to-Work program and would be installed in 2026 and 2027. The field camp is currently used to house Alaska Geographic field courses in the summer.

Location: Teklanika Campground Field Camp at the south end of Teklanika River Campground

NHPA Assessment of Effect: No Historic Properties Affected

46. Denali Visitor Center Waterline Installation

Description: The NPS proposes to abandon the existing offline water line in the Denali Visitor Center parking lot and install a new water main from a fire hydrant at the interface between the Visitor Center and the parking lot to the historic Powerhouse building, creating a loop with the existing water main. The abandoned line would not be excavated, and the new line would require 640 linear feet of excavation through a previously disturbed area.

Location: Denali Visitor Center campus and parking lot
NHPA Assessment of Effect: No Historic Properties Affected

47. Seasonal Housing Fire Suppression

Description: The NPS proposes to install a fire suppression system in each NPS seasonal housing unit to meet current fire safety codes. These housing units are “dry” for most of the year and do not have winterized plumbing so traditional sprinkler systems may not be feasible. Design alternatives are currently in development in 2026.

Location: C-camp and MSLC Housing areas
NHPA Assessment of Effect: To Be Determined

48. Riley Creek Campground Repaving

Description: The NPS proposes to repair the road subgrade and repave the road surface with asphalt at Riley Creek Campground. The project scope could include all three campground loop roads, the frontage road, the walking path connecting the loops to the Mercantile, and the post office area. Staging areas could include the Riley Creek Day Use Parking area. Portions of the campground would need to be closed to visitors for up to a month at a time, on a rotating basis, with the entire project being completed in one season. Design is currently in development in 2026, and implementation would be in 2027.

Location: Riley Creek Campground
NHPA Assessment of Effect: To Be Determined

Natural and Cultural Resources

49. Cultural Resource Inventories (2023-2027)

Description: The NPS would continue to implement activities that help fulfill the Park's legal responsibilities under Section 110 of the National Historic Preservation Act (54 U.S.C. 306102) to identify, evaluate, and protect historic Properties. Section 110 inventory activities include survey, evaluation, testing, and protection or collection of cultural resources (archeology sites, historic structures, cultural landscape, museum objects, and ethnographic resources).

Location: Throughout the Park
NHPA Assessment of Effect: No Potential to Cause Effect.

50. Plate Boundary Observatory stations - monitor tectonic and magmatic process (2022-2026)

Description: The NPS would continue to permit this research conducted by EarthScope (NSF) to monitor tectonic activity using existing Plate Boundary Observatory (PBO) stations that were installed in Denali in 2007. Data from PBO's integrated network of GPS stations, strainmeters and seismometers, coupled with aerial and satellite imagery, are providing important temporal constraints on plate boundary deformation and are improving our knowledge of the fundamental physics that govern deformation, faulting, and fluid transport in earth's lithosphere.

Location: Wickersham Dome (63.55273, -150.92221) and Tokosha (63.67113, -150.68460)

NHPA Assessment of Effect: No Historic Properties Affected.

51. Long-Term Acoustic Monitoring: Denali Triple Lakes (2022-2026)

Description: The NPS would continue to conduct annual acoustic inventories at the Denali Triple Lakes trail site, which is one of the longest-running sites in the NPS (sampled in 2009, 2016, 2017, 2018, 2019, 2020, and 2021). These inventories aim to explore the implications of detecting change by using a series of monitoring records through time.

Location: Between the second and third lake of Triple Lakes, near the Triple Lakes Trail.

NHPA Assessment of Effect: No Potential to Cause Effect.

52. Monitoring Passerine bird populations: CAKN Vital Sign Monitoring Program (2022-2026)

Description: The NPS would continue to conduct observational bird surveys to detect changes in a series of metrics associated with distribution, presence, relative abundance, and peak detection times of a suite of passerine birds over time. Survey routes include roadside surveys and offroad surveys. This long-term monitoring program is part of the Central Alaska Network (CAKN) and has occurred annually in Denali since 1992.

Location: Along Denali Park Road and within 6km of the Park Road.

NHPA Assessment of Effect: No Historic Properties Affected.

53. Stream Assessments (2022-2026)

Description: The NPS would continue to conduct stream assessment activities throughout Denali National Park and Preserve including physical habitat surveys, stream morphology surveys, pebble counts, floodplain assessments, flow measurements, macroinvertebrate sampling, and collecting water samples. The project may also include the temporary installation of temperature and environmental conditions logging devices, survey benchmarks, trail cameras, and hydrophones.

Location: Throughout the park

NHPA Assessment of Effect: No Historic Properties Affected

54. Fuels Reduction and Fire Mitigation (2025–2029)

Description: The NPS would continue to implement fuels reduction and maintenance activities to improve public safety, as referenced and defined in the DENA Fire Management Plan (updated in 2024). Project work would consist of mechanical thinning (i.e., tree cutting and trimming), prescribed burning (i.e., pile burning), and Firewise work (i.e., clearing defensible space around buildings and structures). On-site pile burning would be conducted in conjunction with a soil and vegetation monitoring program. All units would be surveyed for cultural resources prior to treatment and artifacts would be avoided or protected. In 2026, mechanical treatment and pile burning areas could include the entrance area trails and Park Road corridor between Mile 0 – Mile 2.

Location: Frontcountry Developed Area

NHPA Assessment of Effect: No Adverse Effect

55. Spring Abundance Surveys for Willow and Rock Ptarmigan (2024-2028)

Description: The NPS would continue to permit this research conducted by the AK Dept of Fish and Game to survey the abundance of willow and rock ptarmigan in two areas of Denali National Park and Preserve. Surveys occur between 1 and 31 May for a total of 3 to 4 days. Within each day, surveys occur during the two hours after sunrise and the 2 hours prior to sunset. Surveys consist of playing the call of a territorial male ptarmigan using an electronic game caller to elicit a response from adjacent territorial males. The total number of responding males by species, the direction from which they responded, and their behavior will be recorded at each listening post.

Location: Along a four-mile stretch of the Denali Park Road between Mile 15 and 23 and along a two-mile transect north of the Park Road along Primrose Ridge.

NHPA Assessment of Effect: No Historic Properties Affected.

56. Wolf and Coyote Monitoring in Denali NPP (2022-2026)

Description: The NPS would continue to capture and radio collar wolves each year to maintain at least 2 radio collared wolves in each pack whose home range is at least partly within the designated wolf population monitoring zone. Wolves are captured using immobilizing darts fired from a low-flying helicopter and wolves are equipped with radio collars containing either conventional VHF transmitter beacons or satellite-linked GPS locators. Collared wolves are located by aerial radiotracking from single-engine airplanes approximately twice monthly during March – Sept (more intensively May - June to locate dens and estimate pup production), and opportunistically during winter. In addition to the wolf monitoring project, the NPS would continue to capture and radiocollar up to 5 coyotes per year along the northeast boundary of Denali. This monitoring project has been conducted in Denali since the 1980s.

Location: Within Denali NP, north of the Alaska Range, including the Windy Creek watershed.

NHPA Assessment of Effect: No Potential to Cause Effects.

57. Inventory and monitoring program for the streams and rivers of Denali (2022-2026)

Description: The NPS would continue to conduct this long-term stream monitoring program as part of the Central Alaska Network (CAKN) Inventory and Monitoring Program. Monitoring activities include water sampling of rivers and streams in the Park at road-accessible sentinel sites that are sampled approximately annually, and helicopter-accessed remote sites that are sampled either once or on an approximately decadal revisit schedule. In addition, small temperature loggers, most of which have been deployed in 12 streams along the park road since 2008, would be maintained and replaced as necessary.

Location: Throughout the park

NHPA Assessment of Effect: No Potential to Cause Effects.

58. Dynamics of the Denali Caribou Herd (2022-2026)

Description: The NPS would continue to monitor long-term population trends, vital rates, and other population characteristics that determine the status of the Denali Caribou Herd. It would also continue to research survival patterns and habitat selection of male caribou. In March, female caribou are captured by helicopter darting and radiocollared to monitor survival, productivity and movements, and composition surveys and herd counts. Radiocollared caribou are relocated by radiotracking from fixed wing aircraft every 2 months. In addition, female caribou are relocated in mid-May to assess natality. We also conduct 2 helicopter surveys to assess the age/sex structure of the herd annually (early June and late September).

Location: Throughout the Park and Preserve

NHPA Assessment of Effect: No Potential to Cause Effects.

59. Vertebrate ichnology and paleoenvironments of the Upper Cantwell Formation (2022-2026)

Description: The NPS would continue to permit an external researcher to investigate the taxonomic richness and paleoecology of dinosaurs and other vertebrates in Denali National Park through backcountry excursions. There is abundant trace fossil evidence preserved in the Cantwell Formation, North America's most prolific, high-latitude dinosaur track assemblage. If significant specimens are located during excursions, they would be photographed or imaged using photogrammetry. Silicone peels would be made for some tracks when size, weather, and preservation are appropriate. In addition to possibly collecting tephra (volcanic ash) samples for radiometric dating, fossils may be collected when necessary. This would only occur if specimens are at risk of being lost due to erosion.

Location: Big Creek drainage, Tattler Creek, and Cabin Peak areas.

NHPA Assessment of Effect: No historic Properties Affected.

60. Monitor permafrost on burned and un-burned sites near Gosling Lake (2024-2028)

Description: The NPS would continue to utilize an unmanned aircraft system (UAS) to carry a multi-spectral sensor and a radiometric thermal sensor to Gosling Lake to monitor permafrost once every three years. The UAS would be operated between 100 and 120 meters AGL, at speeds of 10-15 mph over both transect sites. There will be ~ 8 take-offs and landings per transect site (~50 acres each), and each flight segment lasting 10-12 minutes each, totaling ~ 2 to 2.5 hours of flight time for the entire research area.

Location: Lake immediately north of Gosling Lake in the northwest corner of Denali NP

NHPA Assessment of Effect: No Historic Properties Affected

61. Small-Mammal Monitoring at Legacy Plots in Denali by CAKN (2025-2029)

Description: The NPS would continue to monitor small-mammal population dynamics at the Rock Creek legacy plots in Denali National Park and Preserve as part of the Central Alaska Network (CAKN) Inventory and Monitoring program. The monitoring involves mark-recapture sampling via live-trapping of three species of voles (*Myodes rutilus*, *Microtus oeconomus*, and *Microtus miurus*) on four long-term monitoring plots established in 1992. Each plot is approximately 0.8 ha in area contains 100 Sherman live-traps baited with irradiated sunflower seeds (microwaved to prevent germination of the sunflower seeds in DENA). The 400 traps are checked three times daily over four days. Captured animals are identified by sex and species, weighed, and reproductive status noted. Unmarked individuals are implanted subcutaneously between the shoulder blades with transponder tags and released.

Location: Alaska, Denali National Park and Preserve, Rock Creek Drainage

NHPA Assessment of Effect: No Potential to Cause Effect.

62. The Critical Connections Program: Lifecycle of Denali's Migratory Birds (2025-2028)

Description: The NPS would continue to study migratory bird movements as part of the Central Alaska Network (CAKN) Inventory and Monitoring program. The purpose of the study is to document year-round movements of migratory birds that nest in Denali, estimate their annual survival, and assess how conditions across their year-round range affect their ability to return to their northern breeding grounds and successfully produce young. Capture activities would occur during the breeding season. Targeted individuals would be captured, tagged with aluminum lag bands, fitted with a VHF radio transmitter tracking device, and released. Individuals would be recaptured in subsequent years and tracking devices removed before being released. This may include the use of UAS. Non-target individuals that are captured would be banded with USGS aluminum leg bands and some non-target individuals will also be banded with plastic color-coded leg bands to help identify them in future years and for future studies.

Location: Within 4 km of the Denali Park Road (Mile 0-92)

NHPA Assessment of Effect: No Potential to Cause Effect.

63. Weather and climate monitoring in Denali as part of the CAKN I&M Network (2021-2033)

Description: The NPS would continue to maintain six climate stations installed in Denali National Park in 2004 and 2005 as part of the Central Alaska Network's climate monitoring program. The stations continuously record temperature, precipitation, wind speed and direction, soil temperature, relative humidity, snow depth, and solar radiation. Each station is visited annually to download the data, calibrate and swap out sensors, and troubleshoot any problems. Two sites are accessible along the park road, while the four additional sites are in more remote locations and require access by air. The objective of the climate monitoring program is to monitor and record weather conditions at representative locations to identify long and short-term trends, provide reliable climate data to other researchers, and to participate in larger scale climate monitoring and modeling efforts beyond park boundaries.

Location: Toklat, Eielson Visitor Center, Dunkle Hills (above the old mine site), Ruth Glacier (in the Tokosha Mountains above Ruth Glacier), Stampede Airstrip, and Wigand Creek (in the Toklat basin just north of the wilderness boundary near the confluence of the Toklat and East Fork of the Toklat).

NHPA Assessment of Effect: No Historic Properties Affected

64. CAKN I&M Network Permafrost Monitoring in Denali (2021-2031)

Description: The NPS would continue to monitor the thermal and physical state of permafrost within DENA as part of the Central Alaska Network (CAKN) Inventory and Monitoring program. The active layer thickness, soil surface elevation, and soil temperature is measured along six transects in the Toklat Basin (previously measured in 2013), at burned and burned areas near Gosling Lake (previously measured in 2005 and 2019), and at two newly established sites near the Park Road (Wonder Lake and Murie Flats). These sites are remeasured every 3 years.

Location: Toklat Basin, near Gosling Lake, Wonder Lake, Murie Flats

NHPA Assessment of Effect: No Adverse Effect.

65. Effects of Traffic (and No Traffic) on the Behavior of Grizzly Bears (2023-2026)

Description: The NPS would continue this research study to assess changes in grizzly bears' movement and habitat use in response to traffic. The multi-year closure of the western half of the park road in 2021 provides an opportunity to study the effects of high traffic volume on grizzly bears, using the same bears in the same area and thus controlling for major confounding effects. The non-traffic "control" period in 2023-24 can be compared to the impact or "treatment" period when high traffic levels resume in 2026-27. Bears (24) were captured and fitted with radio-collars in 2023 and spring 2024. During the study duration (years 1-4), fixed-wing radio-tracking flights occur monthly (April - Oct) and co-occur with ongoing wolf tracking flights.

Location: Along the park road from Mile 22-77.

NHPA Assessment of Effect: No Historic Properties Affected.

66. Operation and Maintenance of Seismic Monitoring Stations (2026-2030)

Description: The NPS would continue to permit the Alaska Earthquake Center to monitor seismic activity in Denali National Park. This includes the continued operation and maintenance of four existing monitoring stations and three communications sites inside the park. These stations are part of the statewide seismic array to better locate and characterize seismic activity throughout Alaska. Maintenance may involve periodic visits via helicopter to these stations for upgrades or repairs, as needed, which averages once every 2-3 years.

Location: Castle Rocks (63.4188, -152.0844), Kantishna Hills (63.5527, -150.9233), Thorofare (63.4502, -150.2893), McKinley (63.73228, -148.93678), Double Mountain (63.60657, -149.47013), Mt. Healy, and Murie Science Learning Center

NHPA Assessment of Effect: No Adverse Effect.

67. Shallow Lake Monitoring Project-CAKN (2023-2028)

Description: The NPS would continue to monitor shallow lakes as part of the long-term Central Alaska Network (CAKN) vital signs monitoring program. Between 70 and 100 lakes would be sampled within the park boundary using a helicopter and floatplane. Each lake is sampled for water quality, zooplankton composition and abundance, basic lake morphometry, vegetation composition, soil thaw depth to estimate surface water dynamics and determine the condition of shallow lake ecosystems. In addition, soundscape equipment is used to determine the presence and abundance of wood frogs. Staff would set up tents at the Lake Minchumina airstrip or use the facilities at Friday Creek as primary base camps.

Location: Caribou Lake, Billberg Lake, and 161 lakes (near Minchumina Basin and Eolian Lowlands)

NHPA Assessment of Effect: No Historic Properties Affected.

68. CAKN glacier monitoring in Denali (2023-2032)

Description: The NPS would continue to monitor the Kahiltna Glacier as part of the long-term Central Alaska Network (CAKN) monitoring program. This monitoring was first conducted in 1991 and has continued to be conducted by NPS since 2016. The goals of that program are to track annual changes in mass balance (snow accumulation and snow/ice melt), and to relate those changes to climatic (temperature, precipitation, etc.) and dynamic (changes in glacier geometry) forcings. This requires monitoring glacier conditions at multiple elevations (approximately 14,300', 10,000', 7100', 6300', and 3800') along the centerline of the Kahiltna Glacier. A single, 1" diameter pole is placed vertically in the snow/ice surface of the glacier (except at the 10,000' site) and measurements are taken with GPS units. Snow pits and/or shallow snow cores (using a hand-drill) are used to measure snow quality.

Location: Kahiltna Glacier

NHPA Assessment of Effect: No Potential to Cause Effects.

69. Monitoring the pattern and consequences of spruce bark beetle infestation (2023-2032)

Description: The NPS would continue to monitor the spruce bark beetle infestation. The purpose of this study is to create a baseline understanding of the variation in white spruce forest composition and structure in areas anticipated to be affected by an ongoing spruce bark beetle outbreak and then monitor the consequences of this outbreak over time. Field activities occur at 99 plots and include small metal plot markers installation, soil profiles, soil samples, tree cores, and vegetation measurements.

Location: Denali frontcountry area including Rock Creek, Riley Creek, Middle Teklanika River

NHPA Assessment of Effect: No Historic Properties Affected

70. Denali Acoustic Monitoring Program (2023-2032)

Description: The NPS would continue acoustic monitoring at 121 unique monitoring locations in Denali. Core purposes of monitoring have included: (A) ensuring compliance with Denali's 2006 Backcountry Management Plan, (B) observing the effectiveness of management actions [including adoption of quiet technologies, best practices, or contract stipulations], and (C) phenology studies. We deploy equipment with a 3 x 2-meter footprint and two spiral anchors for at least one month in duration.

Location: Throughout the park

NHPA Assessment of Effect: No Potential to Cause Effect.

71. Collecting dragonfly larvae for mercury analysis (2023-2032)

Description: The NPS would continue to participate in this ongoing nationwide citizen science research that is evaluating the utility of dragonfly larvae as indicators of mercury status in national parks. Groups of 15 or fewer staff members and citizen scientists collect dragonfly larvae, water samples, and sediment samples from lakes and ponds along the park road corridor and the George Parks Highway. Access is on foot; a total of up to 80 dragonfly larvae will be collected in the park each year, from two or more sites.

Location: Lakes and ponds within 1.5 miles of the Denali Park Road or Parks Highway

NHPA Assessment of Effect: No Potential to Cause Effect.

72. Long term ecological monitoring of streams (2023-2027)

Description: The NPS would continue to conduct long-term monitoring of ten key streams along the Park Road corridor that were identified following an intensive study of 43 streams in 1995. The goal is to identify long-term natural variation in stream communities to be used as a baseline with which to measure anthropogenic or long-term natural change (e.g., due to global warming). The study involves collecting six water samples at sites upstream of road crossings.

Location: Savage Creek, Sanctuary Creek, Hogan Creek, Igloo Creek, N4, Tattler Creek, East Fork Tributary (near East Fork cabin), Highway Pass Creek, Little Stony Creek West and Moose Creek.

NHPA Assessment of Effect: No Historic Properties Affected.

73.Changing disturbances, ecological legacies, and the boreal forest (2023-2028)

Description: The NPS would continue to permit an external researcher to measure abrupt thaw features in the Toklat River basin as part of the Long-Term Ecological Research (LTER) Network. The project seeks to determine how legacies constrain the response of the Alaskan boreal forest to climate change, how these legacies will affect future ecosystem trajectories, and what the local, regional, and global impacts of these changes are now and in the future. At each site, water samples are collected from the outflow to analyze DOC, DIC, nutrients, bioavailability, and radiocarbon age of DOC. Each abrupt thaw site is also monitored for rate of expansion using GPS, as well as measuring the thaw depth, organic soil depth, vegetation height, and normalized difference vegetation index.

Location: Throughout the park

NHPA Assessment of Effect: No Historic Properties Affected.

74.Wildfire and Abrupt Thaw effects on the Carbon balance of High-latitude ecosystems

Description: The NPS proposes to issue a permit to an external researcher to expand on concurrent research (see project #73) and assess the role of wildfire in accelerating permafrost thaw and carbon loss. The project would integrate landscape-level soil measurements collected at six previously established sites within the Central Alaska Network (CAKN) Inventory and Monitoring grids, which burned in 2013, with measurements collected at six additional control sites to the east of the grids. At each of the sites, they would collect 4 surface organic layer samples and three deep soil core samples using a fuel-operated SIPRE drill (3" diameter; approximately 1-1.5 m deep). Access to all sites would be via helicopter from Stampede Road, with multiple flights daily over 2-3 weeks.

Location: Toklat River basin

NHPA Assessment of Effect: To Be Determined

75.Alaska Range Dall's Sheep Ecology and Health Assessment, ADFG (2024-2027)

Description: The NPS would continue to permit the Alaska Department of Fish and Game, Department of Wildlife Conservation, to conduct a Sheep Ecology and Health Assessment study in Denali. The study includes capturing, marking, and tracking 30 rams and 30 ewes in each of two different study areas (a treatment study area outside the park, with a general season full curl hunting paradigm, and a control study area within the park, with minimal hunting pressure as only federally qualified subsistence individuals are allowed to hunt in the area). In 2026, due to collar failures and mortalities, ADFG would conduct supplemental ram captures in mid-June to maintain their radio-collared sample size (around 5 new collars and 5 or more recollars). Also, ADFG would conduct ground-based counts (helicopter access) in the first 3 weeks of July.

Location: Extending west from the Parks Highway to the Herron River drainage along the north side of the Alaska Range.

NHPA Assessment of Effect: No Potential to Cause Effects.

76. Stabilize Historic Slippery Creek Cabin

Description: The NPS would continue to stabilize the historic Slippery Creek cabin. Slippery Creek is a historic mine site consisting of abandoned underground workings, a tree-room cabin, an airstrip, and a connector road. The Slippery Creek Cabin was built prior to 1941 and is unique for Denali in design and location and proposed to be significant on a local level as a physical representative of mining exploration and extraction. In 2024, repairs were made to the roof. In 2026, work would include repairs to the cabin's foundation. An archeological monitor would be required during the excavation.

Location: Slippery Creek Mine (southwest of Kantishna)

NHPA Assessment of Effect: No Adverse Effect.

77. Small Unmanned Aircraft Systems (sUAS) in NPS Operations (2024-2028)

Description: The NPS would continue to use Unmanned Aircraft Systems (UAS) operations in Denali Park and Preserve for administrative purposes such as Search and Rescue, scientific study, fire operations, law enforcement, natural and cultural resource stewardship, education/interpretation, and training flights. This only includes flights specifically operated or administered by the NPS. UAS flights will be conducted in compliance with all applicable FAA regulations, Code of Federal Regulations, and in accordance with any applicable Special Flight Rules Area considerations.

Location: Throughout the Park

NHPA Assessment of Effect: No Adverse Effect.

78. Resampling plots for landscape scale vegetation monitoring (2024-2028)

Description: The NPS would continue to resample vegetation monitoring plots to detect, quantify, and investigate patterns in the distribution and abundance of plants species, as well as any changes in community composition and vegetation structure at a landscape scale. Work includes taking low-impact measurements of vegetation attributes in 26 study areas. No new ground disturbance or installations.

Location: Throughout the Park, mostly north of the Alaska Range

NHPA Assessment of Effect: No Adverse Effect.

79. Effects of spruce mortality on insect biodiversity and fire behavior in Denali (2024-2026)

The NPS would continue to permit this US Geologic Survey (Upper Midwest Environmental Sciences Center) research project. The project quantifies how spruce bark beetle-induced tree mortality will impact pollinator and beetle biodiversity in the Denali boreal forest ecosystem and, secondarily, models how changing fuel loads may affect wildfire behavior in these forests.

Location: Along the southern Park boundary and near the Visitor Center, as well as 'control' sites along the Park Road (including within the Wilderness area).

NHPA Assessment of Effect: No Adverse Effect.

80. Monitoring the Reproductive Success and Productivity of Golden Eagles (2025-2034)

Description: The NPS would continue to monitor Golden Eagles as part of the Central Alaska Network (CAKN) monitoring program. Denali's long-term monitoring program started in 1988, with the goal of revealing the ecological relationships between Golden Eagles, their prey, and their habitat. Monitoring includes annually documenting the occupancy and reproductive success of golden eagles and the nest success of gyrfalcons using aerial surveys (and additional ground-based observations as needed). In late March through mid-April, adult Golden Eagles are captured using a netlauncher or bownet baited with locally obtained carrion. Juveniles are captured at the nest. Captured eagles are banded, sampled, and tagged with a lightweight transmitter. Naturally shed feathers are collected at a sample of nests each year for DNA analysis. After testing, the feathers are deposited with the USFWS Eagle Repository in Colorado. These activities are conducted under the required federal and state permits.

Location: Northern foothills of the Alaska Range

NHPA Assessment of Effect: No Potential to Cause Effects.

81. Understanding Permafrost Dynamics along the Denali Park Road (Phase 2)

Description: The NPS proposes to issue a multi-year permit to researchers from University of Alaska Fairbanks to assess permafrost dynamics along the Denali Park Road corridor. The research would help NPS advance adaptation strategies for infrastructure impacted by permafrost degradation and support management decision-making. Reconnaissance work occurred in 2024-2025, and phase 2 (2026-2027) would include drilling and collecting soil samples along the Park Road corridor at up to 128 sites, including in wilderness. It would also include the installation of instruments in and around those boreholes to measure thaw depths and monitor temperatures (to be left in place for several years). Ground disturbance activities would be monitored by an archeologist.

Location: Along the Park Road from road from mile 0 to 92.

NHPA Assessment of Effect: No Adverse Effect.

82. Climate, Permafrost, and Infrastructure: Landslide hazard assessment (2023-2026)

Description: The NPS proposes extending this permit by one year to a researcher from the University of Alaska Fairbanks to continue to collect data from five instrumented boreholes installed in 2023. The purpose of the study is to monitor mountain permafrost and better understand the permafrost mechanisms driving increased mass-movements in Denali National Park. The borehole instruments and a weather station will remain in place at the conclusion of this study, as part of a concurrent study (see project #81).

Location: Along a transect across the Park Road in Igloo Canyon

NHPA Assessment of Effect: No Adverse Effect

83. Denali Vegetative Fuel Reduction Monitoring Program (2025-2034)

Description: The NPS would continue to monitor the impacts of fuels treatment activities and wildland fire occurrences. The monitoring program is designed to determine whether fire and resource management objectives are met, as well as to document any unexpected or unintended consequences. Primary monitoring activities are observational, apart from the following potential actions:

- Marking plot centers with either a 3.25" metal cap flush with the ground, a wooden stake at plot center or the end of each transect line (1-4 total), and/or a 2" magnet buried 10cm below ground.
- Exposing two 2" x 2" duff plugs per plot for measuring litter and duff layer thickness.
- Tagging up to two trees per plot with 1" circular metal numbered tags.
- Collecting voucher specimens of vascular or nonvascular (moss or lichen) plant species for identification purposes only. Fewer than 30 specimens expected of each type per unit.

Location: Treatment units within the Park Road corridor.

NHPA Assessment of Effect: No Historic Properties Affected

84. Re-sampling Legacy Fire Monitoring Plots in Denali NW Preserve

Description: The NPS proposes to revisit 23 previously established monitoring plots to gain additional insight into how naturally occurring wildfires reduce vegetative fuel loads and impact ecosystems over time. These western plots were installed following past wildfire occurrences and have rich monitoring histories that document fire effects and post-fire recovery. Each plot would only be visited once between 2025-2034. Monitoring activities at each plot would be similar to those conducted in Denali frontcountry (see project #83) and would include exposing two duff plugs (2" x 2") per plot for measuring litter and duff layer thickness and collecting voucher specimens of vascular or nonvascular (moss or lichen) plant species for identification purposes only.

Location: Denali National Park's Northwest Preserve

NHPA Assessment of Effect: No Adverse Effect

85. Impacts of spruce beetle outbreak on soil, mycorrhizae, and forest composition (2025-2028)

Description: The NPS would continue to permit researchers from the University Alaska Anchorage and Amherst College to investigate the effects of spruce bark beetles on northern forests with a focus on mycorrhizae and soil dynamics. This is a continuation of research conducted in 2023 and 2024. The study capitalizes on the intersection of a massive northbound spruce beetle outbreak with a network of long-term ecological monitoring (LTEM) plots established in Denali in 1992. Measurements are collected at 30 plots for a total of 166 study trees. Study methods include observation of vegetation structure and composition, measurement of sap flows, monitoring soil respiration, and collection of fine root samples and small soil cores (2cmx10cm deep) once per season.

Location: along Park Road (east of Mile 12), along the Parks Hwy, and at the Rock Creek LTEM sites.

NHPA Assessment of Effect: To be determined.

86. Spruce Beetle Cold Weather Mortality Assessment (2026)

Description: The NPS proposes to issue a permit to the Alaska Division of Forestry & Fire Protection to investigate Spruce Bark Beetle mortality following a period of extreme cold during the 2025/2026 winter. Study methods would include collection of bark samples (approx. 6" x 6") from a total of up to 12 beetle-affected trees, and general plot measurements at each sample site. These samples are likely to contain Spruce Beetles and/or other insect species, which would be destroyed following analysis.

Location: DENA frontcountry, outside of wilderness and at least 100 feet from any Park road or trail.

NHPA Assessment of Effect: No Historic Properties Affected

87. Spruce Beetle Population Monitoring (2026-2030)

Description: The NPS proposes to issue a five-year permit to the Alaska Division of Forestry & Fire Protection to monitor Spruce Bark Beetle populations in Denali National Park. This would be a continuation of monitoring that occurred in 2021-2025, including the continued use of beetle trapping. Trapping would consist of annually installing two Lindgren funnel traps baited with propylene glycol, a standard tool for bark beetle monitoring. Traps would be installed around mid-May, checked at 2-week intervals through early September, and then removed at the end of the season. These efforts identify when spruce beetle flight periods begin, peak, and end each season, as well as relative beetle populations, which can inform management decisions and tree processing recommendations.

Location: East of the Parks Highway near the Park entrance and near the pullout around mile 234

NHPA Assessment of Effect: No Historic Properties Affected

88. Targeted Invasive Plant Species Surveys and Removal (2024-2029)

Description: The NPS would continue to survey and remove invasive plant species as a part of the Alaska Region Invasive Plant Management Plan (2010, amended 2017). In Denali, survey work would focus on elodea, which is often spread by floatplanes. Removal work would focus on hawksbeard found in the entrance area of the park and would be done by either spraying herbicide or hand pulling/digging.

Location: Park entrance area, Horseshoe Lake, Wonder Lake, Ruth Glacier terminal lakes, Backside Lake, and Lake Chilchukabena.

NHPA Assessment of Effect: No Historic Properties Affected.

89. North American Breeding Bird Survey in Denali (2026-2030)

Description: The NPS would continue to survey breeding birds annually along two routes established in the mid-1980s as part of a long-term, international avian monitoring program to track the status and trends of North American bird populations. Field methods include driving the Park Road and recording visual and aural observations.

Location: Along the Denali Park Road (approximately Mile 14.5 - Mile 39 and Mile 53.5 - Mile 78)

NHPA Assessment of Effect: No Adverse Effect.

90. Understanding Body Composition Changes in Climbers on Denali (2026)

Description: The NPS proposes to issue a permit to an external researcher to measure nutritional dynamics and body composition changes of climbers on Denali. This project would recruit up to 48 participants who plan to climb Denali in the 2026 climbing season and would require the researchers to reside at Basecamp to collect biometric data from the climbers before and after their climb, including body measurements and urine samples.

Location: Denali Basecamp and along the West Butress route.

NHPA Assessment of Effect: No Historic Properties Affected

91. Field Investigations for MP234-238 Railroad Realignment

Description: The NPS proposes to issue a research permit to Alaska Department of Transportation and Public Facilities to conduct field investigations to inform the potential realignment of the Alaska Railroad between approximately MP234-238, eliminating the crossings of the Parks Highway. Field investigations for 2026 to include a cultural survey, wetlands survey, planimetric survey, and preliminary survey to inform geotechnical investigations in 2027.

Location: West of the Parks Hwy between MP 234 and 238.

NHPA Assessment of Effect: To Be Determined

92. Developing Native Plant Materials for Ecosystem Restoration (2026-2030)

Description: The NPS proposes to issue a five-year permit to an external researcher to collect native plant seeds in Denali for the purpose of developing a source of native plants for restoration projects throughout interior and Northern Alaska. All seeds would be hand-harvested. The initial phase of the project would be to effectively establish a seed increase field, which aims to multiply seeds collected from diverse wild plant life forms such as forbs, shrubs, trees, nitrogen fixers, and wetland species, and ensure their suitability for current and future environmental conditions.

Location: Denali Park Road corridor

NHPA Assessment of Effect: To Be Determined

93. Fitbits For Trees: Linking Hourly Tree Growth with Weather Conditions (2026-2028)

Description: The NPS proposes to issue a three-year permit to an external researcher to measure tree growth patterns near the existing weather station at the Denali Kennels. Dendrometers would be installed on approximately 12 white spruce trees to measure hourly white spruce bole diameter. One soil moisture logger would also be installed. One tree core from each tree would be collected at the end of the project to relate the hourly measurements to the final tree ring width for each year of observation.

Location: Within 250 meters of the McKinley Park Weather Station at the Kennels, Park Headquarters.

NHPA Assessment of Effect: No Adverse Effect

94. History of Vegetation and Fire Regime to Inform Fire Management Planning

Description: The NPS proposes to issue a permit to an external researcher to investigate fire regimes and vegetation changes throughout Denali National Park to better inform fire management strategies throughout the park. The research would utilize lake sediment records spanning 14,000 years to reconstruct both dominant vegetation (via pollen deposits) and fire history (via charcoal deposits) for the purpose of assessing fire return intervals and historic vegetation changes. Field methods would include using two small boats and a coring platform anchored at the deepest part of the lake to collect lake sediment cores using a push coring system with a winch.

Location: Two road-accessible lakes adjacent to the Parks Highway between MP 232-234.

NHPA Assessment of Effect: No Historic Properties Affected

95. Geohazard Monitoring along the Denali Park Road (2026-2030)

Description: The NPS proposed to investigate and monitor unstable slopes along the 92-mile Denali Park Road corridor in anticipation of administrative actions related to geohazards that threaten infrastructure. This is a continuation of similar monitoring that occurred from 2020-2025 and would include the installation of monitoring equipment within the 300-foot-wide road right of way, outside of the right of way, and within designated wilderness. In 2026, the seasonal installation of a time lapse camera near the “Zena Landslide” is proposed. The following amendment to the Park Road Programmatic Agreement (regarding future actions that wouldn’t require further consultation) is also being proposed: temporary installations within the right of way would no longer be limited to 6 months.

Location: Zena landslide (Mile 35.1), Igloo Canyon

NHPA Assessment of Effect: To Be Determined

96. Interior Alaska Forest Inventory and Analysis (2026-2029)

Description: The NPS proposes to issue a permit to the US Forest Service to continue to conduct a forest inventory and analysis study in Denali National Park. This study is part of a nationwide, long-term study that began in Denali in 2018 and will potentially continue through 2060. In 2026, they would revisit four previously established sites and establish one new site to gather information on the status and condition of forest resources as well as possible indicators of ecological change and land cover trends. Field methods include forest attribute data collection, tree borings, and soil cores. Access to all sites, including in eligible wilderness areas, would be via helicopter.

Location: Throughout the forested area of north of the Alaska Range.

NHPA Assessment of Effect: To Be Determined

Interpretation and Education

97.Repair Denali Visitor Center Exhibits

Description: The NPS would continue to perform routine repair and maintenance of indoor exhibits in the Denali Visitor Center, which is a non-historic building.

Location: Denali Visitor Center

NHPA Assessment of Effect: No Potential to Cause Effect.

98.Kennels Sled Room Exhibit Redesign

Description: The NPS proposes to update the Kennels sled room exhibits with more relevant, up-to-date information about the Kennels and interactive displays that will allow for multi-sensory engagement for people of all ages and abilities. The historic sled dog kennels building is the oldest building in Denali National Park still used for its original purpose. Planning for redesign of the Kennels building Sled Room exhibits is expected to begin in 2026.

Location: Kennels Building, Park Headquarters Historic District.

NHPA Assessment of Effect: To Be Determined.

99.Alaska Place Name Signage

Description: The NPS would continue to replace the signs on some bridges along the Denali Park Road with signs that would also display Alaska Native names. The signs would be replaced in kind (brown, wooden) and would still display the existing name for the body of water and the road elevation. The Alaska Native place name would be identified and approved through conversations with tribal partners and approved in advance by the Denali management for use in the park maps, signs, and other public outreach materials. In 2025, the signs at Teklanika and Savage River were replaced. Future replacements may include Moose Creek.

Location: Along the Park Road

NHPA Assessment of Effect: No Adverse Effect.

100. Produce Audio/Video Media to Support Key Safety and Orientation Messages

Description: The NPS proposes to develop several new media products for visitors including a visitor orientation video and videos related to bicycle safety, wildlife safety, backcountry safety, and the wolf monitoring project. This project would also include the development of podcast-like format using oral histories gathered from former employees and concession bus drivers related to the history of the park road and the development of a podcast-like format to support a walking tour of the Headquarters Historic District.

Location: N/A

NHPA Assessment of Effect: No Potential to Cause Effect.

101. Connect Park Visitors with Key Safety and Orientation Messages (2024-2027)

Description: The NPS would continue to design and install new and updated information panels in frontcountry areas between Miles 0-15. The project strives to create a unified sense of welcome, bring clarity to trip planning, and provide consistent safety information wherever visitors enter the park.

Location: Frontcountry of the Park

NHPA Assessment of Effect: No Potential to Cause Effect.

102. Temporary Installations in the East Fork Area (2022- 2026)

Description: The NPS would continue to provide temporary infrastructure for visitor services in the East Fork Bridge area (Mile 43) while the Park Road is closed at the Pretty Rocks Landslide (Mile 45.4) and East Fork is the westernmost bus destination. The following installations are in place seasonally: a shelter bus, two staff shelters, various information signs, pedestrian barriers, portable toilets, a trash can, and stairs from the road to the river bar. In 2022, NPS also widened a small section of the Park Road and constructed a bus turnaround with an 85 ft turning radius on the east side of the East Fork bridge.

Location: East Fork Bridge area, approximately mile 43 of the Park Road.

NHPA Assessment of Effect: Adverse Effect to Historic Properties. Separate NHPA consultation was sent in Dec 2021 and a Memorandum of Agreement to mitigate the effect was signed in March 2022.

Save the Talkeetna Woods in town on Front Street - No Water Plant & Storage Tank

 Sign petition

134 

Verified signatures 

 Let's get to 200 signatures!

Petitions with 1,000+ supporters are 5x more likely to win!

Recent signers:



Decision Makers: Edna DeVries +1

The Issue

Preserve the Woods on Bear Trail Front Street in East Talkeetna! Block 26 Lot 3 & 4

Two wooded DNR lots in the town of Talkeetna are under threat of being torn down making room for the construction of a 375,000 steel gallon tank by the Matsu Borough and an upgrade and relocation of the current facility. This heavily wooded 1.4 acre property on the 100-year flood zone sits in the back yard of the old Family-Run Swiss Alaska Inn and across from the Boat Launch Campground. **These woods have documented Native Burial Grounds and would level the old Birch & Spruce woods down to gravel** to squeeze this facility between the back yards of Swiss Alaska and Trailside Cabins. It is also the only narrow dirt road in and out to the Boat Launch for Mahay's & Tri-River Phantom Charters, & Trailside Cabins.

Construction - Block 26 Lot 3 & 4: The project that has been submitted for consideration potentially consists of approximately a 375,000-gallon steel tank, relocation Water Facility, Generator/Diesel Tank enclosed by a chain-link fencing and a parking lot. ***Please sign to support remaining at the existing location where there is ample leased property (roughly two acres) to add the tank and consider upgrading the current facility or find an alternate location. Let's not disturb the Native Burial Grounds and infringe on properties by demolishing these historical woods.***

Concerns: *Disturbing Native Historical Sites, Negative Visual Impact, Removes a natural social and corridor trail for locals & visitors, Negative Economic Impact, and Diminishes the unspoiled experience visitors come to find. More information can be found here:*

<https://matsugov.us/data/ProjectDetail.html?id=60527b64-8c1a-414d-90bc-ae201f1e3906>

Solutions: Stay at the existing location or choose an alternate, more appropriate location.

[Report a policy violation](#)



Andrea Shelly Larson

Petition Starter

Media inquiries

The Decision Makers ⓘ



Edna DeVries

Matanuska-Susitna Borough Mayor



Ronald Bernier

Matanuska-Susitna Borough Assembly - District 7



TALKEETNA HISTORICAL SOCIETY & MUSEUM

Established 1972 * PO Box 76 Talkeetna Alaska 99676 * 907-733-2487

To whom it may concern,

The Talkeetna Historical Society has recently become aware of a proposed water storage facility in East Talkeetna, at two adjoining properties near the river along Front Street, otherwise known as Lot 3 & 4 of Block 26. While we understand the importance of these infrastructure measures, THS also has concerns about the historical importance of this specific location.

The general area indicated for development was formerly occupied by the homes of the Native Alaskan people that originated in this area, specifically the Nickoli family. There are also locally known and documented gravesites in the immediate vicinity, on Lot 7 of Block 26. While these graves are not well-marked now due to the passage of time, we are aware of their location and presume there may be others close by. The Talkeetna Historical Society has the responsibility to advocate for the human remains of our original inhabitants, as well as any culturally significant artifacts or cabin sites still existing. We urge the Mat-Su Borough, DNR, and anyone involved in the planning process to fully investigate these gravesites before choosing a water storage location and consider other areas with less historical significance to the townspeople of Talkeetna.

Sincerely,

K. Autumn Merritt
Executive Director
Talkeetna Historical Society
907-733-2487
manager@talkeetnahistoricalsociety.org