

Programmatic Agreement Annual Report for 2022

Sterling Highway Milepost 45-60 Project

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Prepared for:



Alaska Department of Transportation and Public Facilities,
Central Region

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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.

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Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
AHRS	Alaska Heritage Resources Survey
CIRI	Cook Inlet Region, Inc.
DOE	Determination of Eligibility
DOT&PF	Alaska Department of Transportation and Public Facilities
FHWA	Federal Highway Administration
Forest Service	U.S. Forest Service, U.S. Department of Agriculture
HDR	HDR, Alaska, Inc.
KIT	Kenaitze Indian Tribe
MOU	Memorandum of Understanding
MP	Milepost
NRHP	National Register of Historic Places
OHA	Office of History and Archaeology
PA	Programmatic Agreement
PQI	Professional Qualified Individual
Project	Sterling Highway Milepost 45–60 Project
Publication	Professional Publication
SAM	Supervisory Archaeological Monitor
SCRAM	Sensitive Cultural Resources Area Map
SEO	Statewide Environmental Office
SHPO	State Historic Preservation Officer
SOL	Statute of Limitations
Treatment Plan	Data Recovery/Historic Properties Treatment Plan
UAMN	University of Alaska Museum of the North
USFWS	U.S. Fish and Wildlife Service

1.0 Introduction

The Alaska Department of Transportation and Public Facilities (DOT&PF) is reconstructing and realigning the Sterling Highway between Mileposts (MP) 45 and 60 (Project). The Project is funded by the Federal Highway Administration (FHWA) and is therefore considered a federal undertaking subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found in 36 Code of Federal Regulations 800. 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. Code 327 and a Memorandum of Understanding (MOU) dated April 13, 2023, and executed by FHWA and DOT&PF.

DOT&PF and FHWA have found, with concurrence from the Alaska State Historic Preservation Officer (SHPO), that construction of the Project will have adverse effects on historic properties, including sites associated with Alaska Heritage Resources Survey (AHRS) site KEN-00156/SEW-00282 (the “Sqilantnu Archaeological District”). DOT&PF and FHWA have prepared a Programmatic Agreement (PA) to resolve those adverse effects (DOT&PF 2018). The PA was executed in March 2018 by the following Signatories: DOT&PF; FHWA; the Advisory Council on Historic Preservation (ACHP); the Alaska SHPO; the Kenaitze Indian Tribe (KIT); Cook Inlet Region, Inc. (CIRI); the U.S. Forest Service, U.S. Department of Agriculture (Forest Service); and the U.S. Fish and Wildlife Service (USFWS).

HDR, Alaska, Inc. (HDR), prepared this document under contract to DOT&PF in accordance with PA Stipulation IX, *Reporting and PA Review*, which requires DOT&PF to submit an Annual Report to the PA Signatories on the progress and implementation of the PA stipulations. Per this stipulation, DOT&PF is required to submit the Annual Report to the Signatories on or before January 31 each year. This Annual Report fulfills that obligation and addresses the following topics:

- Progress on design and construction of the highway;
- Progress in archaeological identification and construction monitoring;
- Progress on mitigation measures;
- Progress in artifact curation;
- Problems or unexpected issues encountered during the year;
- Progress on PA actions;
- Proposed modifications to the implementation of this PA;
- Additional evaluations, assessment of effects, and most current treatment recommendations; and
- PA Signatory contact information.

2.0 Progress on Design and Construction of the Highway

DOT&PF construction efforts on behalf of the Project in 2022 included:

- Stage 1A (MP 56 – 58): DOT&PF's contractor continued rock excavation, installing slope reinforcement, building out subgrade, paving, wildlife crossings, Fuller Creek re-alignment, and installing retaining walls that mitigate additional wetland impacts. This phase is anticipated to be complete by July 2023.
- Pioneer Roads: DOT&PF's contractor cleared and widened the existing West Juneau and Slaughter Ridge roads on the west to provide access for Phases 2 – 6. The contractor also established a Project office/staging area (Tract C) along the existing Sterling Highway near the Quartz Creek intersection. These improvements significantly reduced the construction footprint with regards to staging for the construction of the Juneau Creek Bridge.
- Phase 3 and 4: DOT&PF awarded the construction of Phases 3 and 4 in August 2022. This work includes all clearing, excavation, drainage, culverts, and wildlife crossings needed to construct most of the roadway to the Juneau Creek Bridge. This phase is anticipated to be completed October 2024.

DOT&PF Preconstruction efforts on behalf of the project in 2022 included:

- Phase 2: Selecting the steel plate girder concept for the Juneau Creek Bridge and achieving a 30% design. Final design is anticipated for August 2023
- Phase 1B: Reached a 99% milestone for design. Constructability reviews with the CM/GC contractor are ongoing, with an emphasis on utility conflicts. Final Design anticipated October 2023.
- Phase 5: An early work package was developed to clear phase 5, while avoiding all known cultural sites. This clearing package will better assist/provide access for geotechnical crews and archaeologists performing data recovery during the 2023 season and is required to advance the design 30% milestone in 2023.
- Right of Way (ROW): All Kenai Peninsula Borough, USFS, Private parcels, and CIRI parcels have been acquired.

3.0 Progress in Construction Monitoring and Archaeological Identification

According to PA Stipulation IV, *Archaeological Construction Monitoring*, the PA Signatories have identified areas where cultural resources are known or have a high potential to exist (see PA Appendix C, *Archaeological Monitoring Plan*). DOT&PF shall ensure that a Secretary of the Interior-qualified Supervisory Archaeological Monitor (SAM) will be on-site during earth-moving activities associated with excavation in these areas unless the SAM determines after field observations and consultation with the Signatories (in accordance with the *Archaeological Monitoring Plan*) that monitoring is not necessary.

The *Archaeological Monitoring Plan* outlines activities to be conducted prior to construction activities (PA Appendix C, *Archaeological Monitoring Plan*, Sections V.A.1–4). These activities are listed in Table 3-1.

Table 3-1. Archaeological Construction Monitoring Activities

Construction Monitoring Activities	Progress / Timeframe
DOT&PF shall develop and distribute maps exhibiting areas that contain or have high sensitivity for cultural resources in Project ground-disturbing locations to Archaeological and Tribal Observers of the PA Signatories. Signatories and Monitors will have 60 days to provide comments on the archaeological sensitivity area maps.	<p>The Sensitive Cultural Resources Area Map (SCRAM) was distributed to PA Signatories in January 2022 and was included in the cultural awareness training packet.</p> <p>HDR updated the SCRAM based on the newest Project alignment and the results of the 2022 field effort. The revised SCRAM is included as Attachment A¹.</p>
DOT&PF or its qualified consultant shall acquire any necessary permits for conducting monitoring activities from the appropriate land managing agency and/or private landowner.	<p>A monitoring permit was acquired from the Alaska Office of History and Archaeology (OHA) for the 2022 field season by the SAM Brian Davis, Homestead Consulting.</p> <p>An Archaeological Resources Protection Act permit was acquired from the Forest Service for the 2022 field season by HDR for archaeological monitoring along Juneau Creek Access Road.</p>

¹ Signatories can view the SCRAM on the Sterling 45-60 Project Confidential Web Map.

Construction Monitoring Activities	Progress / Timeframe
<p>The DOT&PF Project Engineer, the DOT&PF Professionally Qualified Individual (PQI), Archaeological Monitor(s), and Tribal Observers shall organize and participate in a pre-construction meeting with the Construction Contractor and their subcontractors to explain the PA stipulations for the Project and the procedures to follow if Project personnel inadvertently discover or affect historic properties or human remains. The meeting will also discuss the roles and authorities of the Archaeological Monitor(s) and Tribal Observers.</p> <p>The DOT&PF PQI or the Supervisory Archaeological Monitor shall conduct cultural 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 activities.</p>	<p>The pre-construction meeting was held on April 8, 2022 jointly with the cultural awareness training, as allowed under Appendix C, V.A.3. The pre-construction meeting was attended by DOT&PF (Project Managers and PQIs), the Construction Contractor and their subcontractors, KIT Lead Cultural Coordinator, and the SAM.</p>
<p>Archaeological Monitors will flag or guide the placement of construction fencing around historic properties as “avoidance areas” for construction personnel.</p>	<p>The SAM placed flagging around all known historic properties adjacent to work areas. Barrier fence was erected around historic properties and discoveries in consultation with Tribal Observers and the clearing contractor.</p>

Archaeological monitoring within Phase 1A and Phases 3/4/5 was conducted by SAM Brian Davis, Homestead Consulting, working on behalf of Scarsella Brothers Inc. Monitoring commenced on April 11, 2022 within Phase 1A of the Project. Mr. Davis was accompanied by KIT Lead Cultural Coordinator Ruby Willoya-Williams, KIT Tribal Observer Andrew Wilson, or KIT Tribal Observer Bethany Coghill during monitoring efforts. DOT&PF provided weekly monitoring summary reports to PA Signatories throughout the monitoring program (29 weekly memos for Phase 1A and 6 weekly memos for Phases 3/4/5), in accordance with PA Stipulation IV.I.1. and Appendix C *Archaeological Monitoring Plan*. DOT&PF will provide the Archaeological Monitoring Annual Report for Phases 1A and phases 3/4/5 to PA Signatories within 90 days following completion of monitoring for a 90 day review and comment period, pursuant to PA Stipulation IV.I.2.

Archaeological monitoring along the Juneau Creek Access Road was conducted by HDR for a total of three days in July 2022. The Annual Report on Archaeological Monitoring for the Juneau Creek Access Road was provided to Signatories on October 28, 2022 for a 90 day review and comment period.

Archaeological monitoring during all phases of the Project (Phase 1A, Phases 3/4/5 and along Juneau Creek Access Road) resulted in no inadvertent discoveries during construction monitoring in the 2022 field season.

3.1 Archaeological Identification Efforts

HDR archaeologists completed a Phase I/II Identification and Evaluation Survey between June and October 2022 within portions of the Project footprint that had not been previously surveyed. Archaeologists surveyed a total of 7.72 acres, all of which was determined to be low potential for cultural resources due to slope and disturbed areas. Survey methods were designed to locate previously undocumented cultural resources, delineate and verify site boundaries, and gather sufficient information in order to complete determinations of eligibility (DOEs) for cultural resources identified within the Project footprint. HDR archaeologists did not identify any new sites during the 2022 field survey and no previously recorded AHRs sites are located within the survey areas.

4.0 Progress on Mitigation Measures

PA Stipulation V, *Mitigation*, outlines the mitigation measures that have been identified in the PA. Table 4-1 lists each mitigation measure and its progress status or anticipated timeframe for completion.

Table 4-1. Progress in Mitigation Measures

Mitigation Measures	Progress / Timeframe
DOT&PF shall develop a Data Recovery/Historic Properties Treatment Plan in consultation with the Signatories. The Treatment Plan is to be updated following selection of the build alternative.	Appendix D- <i>The Data Recovery/ Historic Properties Treatment Plan</i> (Treatment Plan) was revised and submitted to Signatories on April 27, 2022. The document was revised based on comments from Signatories and submitted again on October 4, 2022. A <i>Site Specific Treatment Plan</i> was included as Attachment B to the Treatment Plan. The revised version of Appendix D remains pending Signatory approval.
DOT&PF shall complete data recovery fieldwork for historic properties identified in the Treatment Plan prior to construction activities that may adversely affect historic properties.	Data recovery was completed in 2022 according to the requirements of the Treatment Plan (April 2022 Draft Version). Updated Treatment Plan drafts (2020 onward) also identify needs for identification surveys based on Project design changes and the adequacy previous survey coverage. Pedestrian survey was conducted in 2022 and will continue in 2023.
DOT&PF shall develop a professional publication (Publication) that compiles and summarizes available ethnographic, archaeological, scientific, and other literature, accounts, studies, and research products associated with the Sqilantnu Archeological District.	The Publication was drafted and submitted to the PA Signatories for review in 2021. Comments were received from USFWS and SHPO. DOT&PF will develop a subsequent draft of the Publication in 2023 for Signatory review following amendment of the PA.
Based on the contents of the Publication described above, DOT&PF shall develop a public education booklet intended for the general public.	DOT&PF will develop a draft of the public education booklet (Booklet) once the Publication is completed.
DOT&PF shall prepare or sponsor the preparation of a formal National Register of Historic Places (NRHP) nomination for the Sqilantnu Archaeological District based on the results of the Publication.	DOT&PF will develop the NRHP nomination once the Publication is completed.
DOT&PF will work with PA Signatories during design to identify locations and content for Interpretative Signage.	Consultation will occur during design phase of the Project. DOT&PF anticipates that consultation will occur in 2023 – 2024, with implementation of the signage scheduled for 2026.

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Mitigation Measures	Progress / Timeframe
DOT&PF shall coordinate with Signatories and provide funding for Dena'ina Oral Histories Digitization , including digitizing, translating, transcribing, publishing, and distributing previously acquired Dena'ina oral histories currently on cassettes, on CDs, and in written form.	Work began on the Dena'ina Oral Histories Digitization in 2021. An inventory of previous archival work is necessary to avoid duplication of previous efforts. DOT&PF will continue to coordinate with Signatories on the timeframe, although it is anticipated that this mitigation measure will be finalized in 2023.
DOT&PF shall re-investigate the adversely affected segment of the Bean Creek Trail located in the Direct Area of Potential Effects, the segment located at the temporary trail crossing, and the trail segment that would be permanently rerouted.	Completed during 2020 field survey.
DOT&PF shall ensure public access to and the continued usability of the Bean Creek Trail during construction.	To be conducted during construction.
DOT&PF shall reroute Bean Creek Trail, in coordination with the Forest Service, approximately 450 feet west of its current location. The alignment of the rerouted trail is subject to an archaeological survey to ensure that no archaeological sites would be impacted.	Rerouted trail alignment was first surveyed during the 2020 field season. A revised reroute of the trail has been defined and will be subject to pedestrian survey in 2023 field season.
DOT&PF shall provide an interpretive display with a historic mining theme at the trailhead to be built west of the Juneau Creek Bridge for the Resurrection Pass Trail and along the Bean Creek Trail at a location determined by the Forest Service.	Display panels are to be installed at the time of trail and trailhead construction. DOT&PF will work with PA Signatories during design to identify locations and content for appropriate signage. DOT&PF anticipates that consultation will occur in 2023 – 2024, with implementation of the display scheduled for 2026.

5.0 Progress in Artifact Curation

PA Stipulation VIII, *Curation*, outlines the curation guidelines for artifacts collected during the course of the Project. The *Curation Plan* is included as PA Appendix H. The *Curation Plan* clarifies ownership and disposition of artifacts and materials. It also addresses the disposition of artifacts, faunal materials, and/or samples that archaeologists collected for the Project, along with photographs, field notes, and other related materials from activities covered by the PA. Table 5-1 summarizes the procedures outlined in the *Curation Plan*.

Table 5-1. Artifact Curation Procedures

Curation Procedures	Progress / Timeframe
Following selection of an alternative for the Project, the Data Recovery/Historic Properties Treatment Plan will be updated and will include information on the maintenance and treatment of collections prior to disposition at the University of Alaska Museum of the North (UAMN) or other approved curation facility.	Maintenance and treatment of collections information was added to Section 10.2, <i>Curation</i> , of the Treatment Plan.
A curation agreement with the UAMN and the appropriate land-managing agency and/or owner will be developed. The curation agreement will follow the procedures outlined in the Curation Plan (Appendix H of the PA) regarding such matters as ownership, curation funding, and reporting.	The UAMN MOU Curation Agreement was used for 2022 Field Permits. Curation agreements for data recovery activities were part of 2022 permit applications. DOT&PF developed a Memorandum of Agreement (MOA) among the UAMN, CIRI, and KIT regarding artifacts collected within the Russian River Land Act (RRLA). The MOA was signed in January, 2023 and is attached as Appendix D.
DOT&PF and the UAMN have a MOU (DOT&PF 2013) in place regarding the curation of collections from State lands (included as Appendix H of the PA).	Per the MOU (II.A), the document reached the end of its 5-year review period in January 2019. DOT&PF and the UAMN reviewed the agreement and extended the MOU for an additional 10 years (2029).

5.1 Materials Collected During the 2022 Field Season

Materials² collected from the Project during the 2022 field season are listed in Attachment B.

In order to use Project time and funds more efficiently, DOT&PF intends to store these artifacts in their current location so that they may be available for analysis and testing, and upon conclusion of analysis be accessioned by UAMN in a single transfer of custody with other artifacts expected to be recovered during later field seasons.

² Materials include artifacts, faunal remains, soils, and radiocarbon samples.

6.0 Problems or Unexpected Issues Encountered During the Year

- DOT&PF notified Signatories on February 2, 2023 that the Project inadvertently affected a historic site with a pending DOE. SEW-01756 (aka Donahoe's) was located within the Project footprint and was demolished on September 16, 2022. DOT&PF investigated the process that resulted in the demolition. The parcel was acquired during the construction phase as a "change order". This unique situation resulted in Parcel 14 not being certified for environmental compliance, including Section 106, which resulted in a communication breakdown between ROW and environmental. After acquiring the parcel, DOT&PF ROW completed a hazmat report which recommended demolition of the buildings on the property. DOT&PF is implementing the following steps: 1) DOT&PF will continue to develop a detailed homesteading historic context to provide an appropriate context for completion of the SEW-01756 DOE. 2) A PQI or SOI-qualified archaeologist will visit the site and document the adverse effect through photographs, notetaking, and subsurface testing as appropriate during the 2023 archaeological field season. 3) DOT&PF will conduct an internal assessment and correction of the protocols that resulted in the demolition of a building prior to DOE completion
- The COVID-19 pandemic resulted in complications to archaeological fieldwork during the 2022 season. Field staff followed all COVID-19 safety guidelines issued by the Centers for Disease Control, the State of Alaska, and DOT&PF. These requirements increased logistical concerns and slowed aspects of fieldwork.
- State Cultural Resources Investigation Permits (SCRIPs) were issued two weeks into the field season. Initial archaeological investigations and data recovery therefore took place at sites on Federal lands in the interim.
- In coordination with the OHA (as the permitting agency) and PA signatories, a phased excavation approach was undertaken at KEN-00092. During the phased approach, HDR and OHA coordinated effectively to plan and implement data recovery. However, the phased approach created minimal delays as HDR archaeologists coordinated with OHA in the field to determine next steps for data recovery at specific intervals while working at the site.
- Beetle kill trees around KEN-00092 started falling in relatively low wind conditions, creating an unexpected safety issue for the field crews.
- Record rain during the field season resulted in delays during data recovery.
- The original timeline of revising the 2018 PA by end of 2022 was not met. The process is continuing into 2023 with a new goal ratification date of May 2023.
- Signatories and contractors devoted attention to revising and updating the 2018 PA. Some mitigation measures outlined in the PA did not progress during negotiations (See Table 4.1).

7.0 Progress on PA Actions

7.1 Annual Meeting

DOT&PF shall coordinate an annual Project Update Meeting with all parties to the PA to be held by the end of March 2022 (per PA Stipulation IX., *Reporting and PA Review*). DOT&PF shall notify the ACHP 30 days prior to the meeting. The ACHP may participate at its discretion.

- Project Update Meeting was held 60 days after the issuance of the Annual Report (March 30, 2023). Participants were given 30 days' advance notice of the meeting.

7.2 Mid-Year Meeting

DOT&PF shall coordinate a mid-year Project Update Meeting with all parties to the PA. Participants will be given 30 days' advance notice of the meeting. The mid-year meeting is anticipated to occur in July or August, 2023.

7.3 Data Recovery and Other Field Efforts

The goal of data recovery is to mitigate the destruction of significant cultural and historic sites through systematic archaeological excavation and analysis to address research questions identified in the PA, Appendix D.

Field efforts in 2022 included pedestrian surveys, subsurface site boundary delineation, archaeological monitoring, and data recovery.

- The results of the 2022 field survey were described in a fieldwork report that was submitted to consulting parties in early January 2023.
- The *Interim Data Recovery Report*³, which summarizes the work completed during the field season, how it was done, by whom, where, preliminary field results, and preliminary field maps, as appropriate. HDR followed reporting stipulations provided in the SCRIP, which require submission of a draft interim report with six months following the end of fieldwork activities. In subsequent field seasons the Interim Data Recovery report will be submitted within 3 months after fieldwork, as stipulated in the amended PA.
- The *Draft Annual Data Recovery Report*, which summarizes the results of the 2022 data recovery effort, will be submitted to PA Signatories within nine months following completion of data recovery, per PA Stipulation V.A.2⁴ (July 2023).

³ This is a new report and part of the October 3 amended PA draft that the Project is implementing now, prior to signature.

⁴ Per October 3 amended PA.

Additional fieldwork activities are anticipated for the 2023 field season based on updates to the Project footprint and construction schedule.

7.4 Archaeological Construction Monitoring and Pre-Construction Meetings

As detailed in Section 3.0, prior to excavation in areas identified as highly sensitive for containing cultural resources, the DOT&PF Project Engineer, the DOT&PF PQI, Archaeological Monitor(s), and Tribal Observer(s) shall organize and participate in a pre-construction meeting with the Construction Contractor and subcontractors to explain PA stipulations, procedures for inadvertent discovery of or effects on cultural resources or human remains, and the roles of Archaeological Monitor(s) and Tribal Observers. The DOT&PF PQI or the SAM will also conduct on-site cultural awareness training to ensure that construction personnel understand the terms of the PA and the types of resources that could be encountered during Project activities. Prior to initiation of construction activities, Archaeological Monitors will flag or guide the placement of construction fencing around historic properties as “avoidance areas” for construction personnel.

- Pre-construction meetings were held on April 8 and April 27, 2022. The pre-construction meetings were held in conjunction with the on-site cultural resources awareness training.
- All avoidance areas were flagged prior to construction activities.
- HDR updated the SCRAM based on the newest Project alignment and the results of the 2022 field effort. The revised maps are included as Attachment A.

7.5 Professional Publication

DOT&PF shall develop a professional publication that compiles and summarizes available ethnographic, archaeological, scientific, and other literature, accounts, studies, and research products associated with the Squalantnu Archeological District.

HDR, under contract to DOT&PF, drafted the Publication and it was submitted to the PA Signatories in 2021. Comments were received from USFWS and SHPO. Efforts in 2022 were focused on revising the PA; therefore, development of the Publication will be revisited in 2023. Further development of the Publication will be conducted in consultation with Signatories. The Publication may undergo further revisions at the behest of the Alaska Journal of Anthropology editorial board prior to acceptance.

7.6 Public Education Booklet

Based on the contents of the Publication, DOT&PF shall also develop a soft-cover booklet (Booklet) intended for the general public. DOT&PF will coordinate with the Signatories, the KIT Educational Committee, and the Alaska Humanities Forum, as appropriate. DOT&PF anticipates the Booklet to cover management and current use of Kenai Peninsula rivers and education on natural, historic, and cultural resources. The Booklet will also cover more recent history, such as Russian influence and mining activity in the area, history of the Sterling Highway, and ongoing and current activities to preserve and document the Squalantnu Archaeological District and Native culture such as ongoing research projects and KIT Susten Camp efforts.

- DOT&PF anticipates initial development of the Booklet will begin in 2023. Initial development of the Booklet may include the development of an outline.

7.7 National Register of Historical Places Nomination

DOT&PF shall prepare a formal NRHP nomination for the Sqilantnu Archaeological District based on the results of the Publication and provide it to the Russian River Land Act MOU Group.

- DOT&PF anticipates that initial development of the NRHP nomination will begin in 2023.

7.8 Cultural Awareness Training

Prior to the initiation of construction activities on the Project, the DOT&PF Project Engineer, the DOT&PF PQL, Archaeological Monitor(s), and Tribal Observers shall organize and participate in a pre-construction training with the Construction Contractor and their subcontractors to make sure that they understand the terms of the PA and the types of resources that could be discovered or affected during Project construction. The training will explain PA stipulations for the Project and the procedures to follow if Project personnel inadvertently discover or affect historic properties or human remains and to discuss the roles of the Archaeological Monitor(s) and Tribal Observers.

The SAM conducted in-person cultural resources awareness training on the following days⁵:

- April: 8, 11, 12, 14, 19, 20, 21, 26, 27
- May: 2, 3, 9, 16, 18, 23, 24, 25
- June: 2, 6, 7, 27
- July: 12, 21, 28
- August: 1, 9, 22, 25
- September: 8, 19, 20, 26
- October: 6, 10, 11, 18, 24, 25

- DOT&PF anticipates conducting Cultural Awareness training for the 2023 season beginning in early spring and continuing as needed for compliance.

7.9 Installation of Interpretive Signage

DOT&PF will work with PA Signatories during design to identify locations and content for appropriate signage (e.g., notification that travelers are entering an historic district, interpretive signage at pull-outs or trailheads) and will erect agreed-to signage during construction.

- DOT&PF has not begun work on this PA action.

⁵ The April 20 and 27 trainings were led by HDR Field Director Megan Koszarek. All other trainings were led by the SAM, Brian Davis.

7.10 Dena'ina Oral Traditions Digitization

Organization and inventory of the Kenaitze archives began in January 2021. This task has been previously attempted but not successfully completed and no inventory, collection guides, or transcripts of those efforts have been identified. KIT archives houses thousands of hours of language information, cultural events, elder interviews and tribal meetings in multiple media formats. A complete inventory is underway to identify materials for the archive project, determine the scope of the archives, coordinate with other KIT departments to avoid duplication, and to work with the IT department to create a layered archive to control access to the materials.

- At this time, DOT&PF is working with KIT to complete a scope of work to finalize the inventory and digitization of the collection.

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8.0 Proposed Modifications to the Implementation of This PA

DOT&PF and PA Signatories focused their efforts in 2022 to amending the 2018 PA. Below is a summary of the consultation record for the PA amendment process that occurred in 2022:

- January 14, 2022: Comments or responses were received from all Signatories following the extended review period.
- February 14: DOT&PF hosted a PA Appendices amendment meeting for all Signatories
- February 22: KIT formally requested amending the 2018 PA
- February 23: SHPO submitted a letter in support of KIT's PA Amendment request
- February 23: DOT&PF submitted a proposed schedule to amend the body of the PA
- February 25: USFWS submitted a letter in support of KIT's PA Amendment request
- March 1: USFS submitted a letter in support of the PA amendment
- March 1: DOT&PF distributed the 2018 PA for a two-week review period
- March 1 – 15: DOT&PF met with Signatories individually to discuss concerns regarding the PA
- March 22: PA Annual Meeting held
- April 4: DOT&PF distributed PA Rev 1
- April 6: FHWA letter submitted clarifying DOT&PF as the lead federal agency
- April 19: DOT&PF hosted a workshop to review PA Rev1
- April 27: DOT&PF submitted a revised PA amendment schedule through June 1
- April 27: DOT&PF distributed Appendix D with 2022 Site Specific Treatment Plans
- May 4: DOT&PF distributed PA Rev2 PA for review
- May 18: DOT&PF hosted a workshop to review PA Rev2
- May 25: DOT&PF hosted a workshop to review PA Appendix D
- June 9: DOT&PF distribute PA Rev3 for review
- July 1: DOT&PF distributed PA Rev 4, with request for signatures by July 8
- July 6: DOT&PF distributes an updated Rev4 with overlooked comments by CIRI
- July 17 – September 13: DOT&PF met with Signatories to discuss PA concerns
- August 1: mid-year PA Signatory meeting held
- August 25: DOT&PF Statewide Environmental Office (SEO) met with KIT to discuss PA concerns
- October 3: DOT&PF submitted Final PA for signature
- October 26: DOT&PF hosted meeting to discuss PA, Project web map, Project effects, and implementation of Signatory monthly meetings
- November 2: HDR hosted training for Project web map
- November 2: DOT&PF distributed effects table
- November 11: PA Rev 5 signature goal
- November 16: DOT requested Signatories to sign PA or sign a one-year extension
- December 13: First Signatory Monthly Signatory meeting held, topic is sensitivity areas
- December 20: SEO met with KIT to discuss concerns about PA
- December 22: SEO met with SHPO to discuss concerns about PA

9.0 Additional Evaluations, Assessment of Effects, and Cumulative Effects

9.1 Additional Evaluations

The Direct APE was originally identified in 2018 as the area where the Project could have direct effects to historic properties, typically encompassing 150 feet (46 meters) on either side of the proposed highway centerline (in some areas it expands up to approximately 350 feet [107 meters] on either side of the centerline to fully encompass proposed cut and fill limits) and potential staging, waste, access, and borrow sites. It also encompassed all aspects of proposed construction staging and access. Since 2018, Project design refinements have occurred, leading to more precise information on location of work.

As the Project developed, more concrete information regarding specific locations of ground disturbing work within the Direct APE that was not known earlier during Project development and consultation became available. This refined area of ground disturbance is referred to as the construction footprint +10 feet (3 meters). Adverse effects to historic properties resulting from ground disturbance are now considered to be those that occur within the construction footprint + 10 feet.

Compared to the 2018 Direct APE, the current version of the construction footprint +10 feet differs in size due to changes to Project components such as the western return loop; changes in the locations and design of staging, waste, access, and borrow sites; and changes to the alignment such as those necessitated by bridge design. The construction footprint +10 feet was most recently updated in January, 2023. The 2018 Direct APE totaled 660.88 acres, whereas the current construction footprint +10 feet totals 554 acres. In general, the construction footprint +10 feet is narrower than the 2018 APE due to greater understanding of the exact location of Project design. The construction footprint +10 feet is a subset of the current Direct APE, which totals 1119 acres.

The 2018 PA identified 12 historic properties within the Direct APE as being adversely affected by the Project, of which 10 were contributing properties to the Sqilantnu Archaeological District, including the Sqilantnu Russian River Confluence Site TCP (KEN-00702/SEW-01497; DOT&PF 2018). The total approximate acreage of the historic properties subject to adverse effects was 13. To account for differences in the project footprint +10 feet versus the 2018 APE, DOT&PF sponsored additional cultural resources inventory in the Direct APE in 2019, 2020, 2021, and 2022.

Within the Direct APE, these surveys resulted in updates to the boundaries of previously identified AHRS sites, as well as the documentation of newly identified historic properties.

Twenty-nine previously identified AHRS site boundaries were modified/refined through the use of high-precision GPS devices in the Direct APE: KEN-00068, KEN-00081, KEN-00091; KEN-00092; KEN-00094; KEN-00133; KEN-00212, KEN-00213, KEN-00214, KEN-00215, KEN-00216, KEN-00247, KEN-00248, KEN-00249, KEN-00250, KEN-00282, KEN-00319; KEN-00320, KEN-00396, KEN-00402, KEN-00405, SEW-00363, SEW-00973, SEW-01198, SEW-01218, SEW-01262, SEW-01270, SEW-01439, and SEW-01629.

Twenty-five newly identified historic properties were identified in the Direct APE: KEN-00734*, KEN-00736, KEN-00737, KEN-00738, KEN-00740, KEN-00741, KEN-00742, KEN-00743, KEN-00744, KEN-00746, KEN-00755, KEN-00756*, KEN-00757, KEN-00758, KEN-00759, KEN-00760, KEN-00761*,

SEW-01631, SEW-01755*, SEW-01756, SEW-01757, SEW-01758*, SEW-01759*, SEW-01760*, and SEW-01761. Asterisks denote sites with a DOE pending.

DOT&PF submitted DOEs for 15 sites on October 6, 2022, along with itemized effects by site and a continued finding of adverse effect on historic properties for the Project as a whole (Hilsinger 2022). DOT&PF finds that the following eight sites are eligible under Criterion D for listing on the NRHP both individually and as contributing elements to the Sqilantnu Archaeological District for their potential to provide data about human history and prehistory: KEN-00734, KEN-00755, KEN-00757, KEN-00758, KEN-00759, KEN-00760, KEN-00761, and SEW-01761. DOT&PF finds that the following seven sites are not eligible for inclusion in the NRHP: KEN-00756, SEW-01755, SEW-01756, SEW-01757, SEW-01758, SEW-01759 and SEW-01760. DOT&PF finds that the Project will continue to have an adverse effect on historic properties, including contributing elements to the Sqilantnu Archaeological District (KEN-00156/SEW-00282; Attachment C)

SHPO responded to DOT&PF's findings of effect letter on October 17, 2022 (Bittner 2022). SHPO concurred with the DOEs for KEN-00734, KEN-00755, KEN-00757, KEN-00758, KEN-00759, KEN-00760, KEN-00761, and SEW-01761. SHPO requested additional information on KEN-00756, SEW-01756, SEW-01757, SEW-01758, SEW-01759, SEW-01760, and SEW-01761.

- DOT&PF is currently working on providing the additional requested information.

9.2 Assessment of Effects and Cumulative Effects

Cumulatively, the Project has an adverse effect on historic properties (as defined in 36 CFR 800.5(a): *"Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative"*). The DOT&PF is continuing to mitigate adverse effects to historic properties through avoidance and data recovery. Itemized effects to sites will be updated annually in the Effects Analysis Table (Attachment C) and will be included in the PA Annual Reports. Considering the development of the Project construction footprint +10 feet, additional archaeological survey, and recent determinations of eligibility, the Project currently adversely effects 20 historic properties (Table 9-1). The sum total acreage affected within discrete archaeological sites is 5.23 acres. Attachment E, AHRS Sites Mapbook, shows the location of historic properties in the construction footprint +10 feet and the Direct APE.

The Effects Analysis Table is included as Attachment C to this report. This table includes current DOE status and treatment recommendations for each site within the Project Direct APE.⁶ The PA was established to govern the resolution of adverse effects due to anticipated complex Project situations [36 CFR 800.14(b)]. Although the sites listed in the Effects Analysis Table are subject to change throughout the life of the Project, effects on historic properties are similar and repetitive. As such, the finding of adverse effects for the Project as a whole remains unchanged and the PA will continue to be used to mitigate adverse effects.

⁶ Signatories can view AHRS sites in relation to Project data on the Sterling 45-60 Project Confidential Web Map.

Table 9-1. Adversely Affected Sites in the Direct APE^a

AHRS No.	Project Action	Acres
KEN-00081	Data Recovery	0.37
KEN-00091	Data Recovery	0.03
KEN-00092	Data Recovery	0.21
KEN-00094	Data Recovery	0.41
KEN-00215	Data Recovery	1.20
KEN-00228	Testing	0.00
KEN-00282	Testing	0.05
KEN-00396	Data Recovery	0.26
KEN-00402	Testing	0.10
KEN-00737	Monitoring	0.01
KEN-00738	Data Recovery	0.53
KEN-00741	Data Recovery	0.06
KEN-00742	Data Recovery	0.04
KEN-00744	Data Recovery	0.14
KEN-00746	Data Recovery	0.25
SEW-00363	Data Recovery	0.02
SEW-00364	PA Stipulations	1.03
SEW-01268 ^b	NA	0.46
SEW-01631	Monitoring	0.02
SEW-01761	Monitoring	0.04

^aBased on the most current update to the Project Construction Footprint +10 feet (January 2023).

^bSEW-01268 is a historic district boundary. Site SEW-01761 is a contributing property to the historic district.

10.0 PA Signatory Contact Information

Table 10-1 is the contact information for Signatories. The PA Signatories are asked to review this table and provide corrected information (or names of additional individuals who need to be added to the distribution list) to DOT&PF.

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Table 10-1. PA Signatory Contact List

Agency / Entity	Name and Title	Address	Phone	Email
Advisory Council on Historic Preservation	Mandy Ranslow	401 F Street NW, Suite 308 Washington, DC 20001-2637		mranslow@achp.gov
Alaska State Historic Preservation Officer	Judith Bittner, SHPO	550 West 7th Avenue, Suite 1310 Anchorage, AK 99501	907-269-8715	Judy.Bittner@alaska.gov
	Sarah Meitl, Coordinator		907-269-8720	sarah.meitl@alaska.gov
Chugach National Forest, U.S. Forest Service	Jeff Schramm, Forest Supervisor	161 E. 1st Avenue, Door 8 Anchorage, AK 99501	907-743-9500	Jeff.Schramm@usda.gov
	Ruth D'Amico Seward District Ranger			ruth.damico@usda.gov
	Timothy Marshall		907-789-6230	timothy.marshall@usda.gov
Cook Inlet Region, Inc.	Suzanne Settle, VP of Energy, Land and Resources	725 East Fireweed Lane, #800 Anchorage, AK 99503		ssettle@ciri.com
	Land Manager, Energy, Land and Resources			
	Ethan Tyler, Senior Director, Corporate Affairs		907-263-5194	etyler@ciric.com
	Chait Borade, Director of Land and Resources			cborade@ciri.com
Department of Transportation and Public Facilities	Sean Baski, Project Manager	P.O. Box 196900 Anchorage, AK 99519-9600		Sean.baski@alaska.gov
	Jonathan Tymick, Project Manager		907-269-0453	jonathan.tymick@alaska.gov
	Erik Hilsinger, PQI, Archaeologist		907-269-0534	erik.hilsinger@alaska.gov
	Mark Rollins, PQI, Archaeologist		907-269-0527	mark.rollins@alaska.gov

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Agency / Entity	Name and Title	Address	Phone	Email
	Mary Ann Sweeney, PQI, Archaeologist			Mary.sweeney@alaska.gov
	Douglas Kolwaite			Douglas.kolwaite@alaska.gov
	Alvin Talbert			alvin.talbert@alaska.gov
	Kathy Price			Kathy.price@alaska.gov
	Molly Proue			Molly.proue@alaska.gov
Federal Highway Administration	Sandra Garcia-Aline, Division Administration	P.O. Box 21648 Juneau, AK 99802-1648	907-586-7180	Sandra.Garcia-Aline@dot.gov
	Melissa Parker		907-586-7430	Melissa.Parker@dot.gov
	Gerald Varney			Gerald.Varney@dot.gov
Kenai Natives Association, Inc.	Vernon Stanford			kna@alaska.net
Kenaitze Indian Tribe	Peter Evon, Executive Director	215 Fidalgo Avenue, Suite 101 Kenai, AK 99611		PEvon@kenaitze.org
	Chelsea Hendricks,	150 N. Willow Street	907-335-7200	chendricks@kenaitze.org
	Bernadine Atchison, Tribal Council Chair	P.O. Box 988 Kenai, AK 99611	907-335-7200	Batchison@kenaitze.org
	Natalia Flores			nflores@kenaitze.org
	Virginia Wolf, Sterling Highway Council Representative			Virginiawolf60@gmail.com
	Sasha Jackson, Executive Assistant			Sjackson@kenaitze.org
	Ronette Stanton			Ronette.Stanton@kenaitze.org
	Ruby Willoya Williams			rwwilliams@kenaitze.org
	Debbie Corbett			nanutsetheritage@gmail.com
U.S. Fish and Wildlife Service Regional Office	Andy Loranger, Refuge Manager	1011 E. Tudor Road, MS 3331 Anchorage, AK 99503	907-260-2804	Andy_Loranger@fws.gov
	Jeremy Karchut, Regional Archaeologist			jeremy_karchut@fws.gov

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Agency / Entity	Name and Title	Address	Phone	Email
	Jacob Adams			jacob_adams@fws.gov

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11.0 References Cited

Bittner, Judy

2022 Letter to Erik Hilsinger, Alaska Department of Transportation and Public Facilities.
Subject: Sterling Highway MP 45-60 STP-F 021-2(1)/Z530140000. October 17.

DOT&PF (Alaska Department of Transportation and Public Facilities)

2013 Memorandum of Understanding between the Department of Transportation and Public Facilities and the University of Alaska Museum of the North Fairbanks, Alaska. Updated January 31, 2019.

2018 Final Section 106 Programmatic Agreement for the DOT&PF Sterling Highway Milepost 45-60 Project. Project No. STP-F-021-2(15)/Z530140000. March.

Hilsinger, Erik

2022 Letter to PA Signatories. Reference: Sterling Highway MP 45-60 STP-F 021-

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Attachment A:
Revised Sensitive Cultural Resource Area Map

**Attachment B:
Material Logs**

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Attachment C:
Effects Analysis Table

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AHRs Number	Site Type	Year First Recorded	Eligibility Status (and year)	Mitigation (2023)	USFS	USFWS	State of AK and/or DOT&PF	KPB	CIRI	Private
							ROW			
KEN-00156/ SEW-00282	Pre/ Proto-historic	1979	Eligible (1981)	Mitigation measures outlined in PA	X	X	X		X	X
KEN-00702/ SEW-01497	Pre/ Proto-historic	2016	Eligible (2013)	Mitigation measures outlined in PA	X	X	X		X	X
KEN-00068	Pre/ Proto-historic	1976	Eligible (1981)	Avoidance					X	
KEN-00081	Pre/ Proto-historic	1979	Eligible (1981)	Data Recovery					X	
KEN-00091	Pre/ Proto-historic	1979	Eligible (1981)	Data Recovery completed 2021		X	X			
KEN-00092	Pre/ Proto-historic	1979	Eligible (1981)	Data Recovery initiated 2022, ongoing		X	X			
KEN-00094	Pre/ Proto-historic	1979	Eligible (1981)	Data Recovery			X		X	
KEN-00133	Pre/ Proto-historic	1982	Eligible (1994)	Avoidance		X	X			
KEN-00212	Pre/ Proto-historic	1986	Eligible (1981)	Avoidance					X	
KEN-00213	Pre/ Proto-historic	1986	Eligible (1987)	Avoidance					X	
KEN-00214	Pre/ Proto-historic	1986	Eligible (1987)	Avoidance (monitoring at site boundary)					X	
KEN-00215	Pre/ Proto-historic	1986	Eligible (2010)	Data Recovery initiated 2021, ongoing					X	
KEN-00216	Pre/ Proto-historic	1986	Eligible (1987)	Avoidance (monitoring at site boundary)					X	
KEN-00228	Pre/ Proto-historic	1988	Eligible (1994)	Avoidance, with testing at boundary of site and footprint, per USFWS request		X	X			
KEN-00247	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance		X	X			
KEN-00248	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance		X	X			
KEN-00249	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance, with testing at boundary of site and footprint, per USFWS request		X	X			
KEN-00282	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance			X			
KEN-00319	Pre/ Proto-historic	1995	Eligible (2007)	Testing to delineate northern boundary		X	X			
KEN-00320	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance					X	
KEN-00396	Pre/ Proto-historic	1993	Eligible (1994)	Avoidance						
KEN-00402	Pre/ Proto-historic	2004	Eligible (2007)	Data Recovery initiated 2022, ongoing			X			
KEN-00405	Pre/ Proto-historic	2005	Eligible (2007)	Testing to delineate northern boundary		X	X			
KEN-00405	Historic	2005	Not Eligible (2011)	N/A Not Eligible					X	

							State of AK and/or DOT&PF			
AHRS Number	Site Type	Year First Recorded	Eligibility Status (and year)	Mitigation (2023)	USFS	USFWS	ROW	KPB	CIRI	Private
KEN-00734	Pre/ Proto-historic	2020	Eligible (2022)	Data Recovery					X	
KEN-00736	Pre/ Proto-historic	2020	Eligible (2021)	Avoidance		X	X			
KEN-00737	Pre/ Proto-historic	2020	Eligible (2021)	Monitoring			X			
KEN-00738	Pre/ Proto-historic	2020	Eligible (2021)	Data Recovery completed 2021		X	X			
KEN-00739	Historic	2020	Not Eligible (2021)	N/A Not Eligible		X	X			
KEN-00740	Pre/ Proto-historic	2020	Eligible (2021)	Avoidance		X	X			
KEN-00741	Pre/ Proto-historic	2020	Eligible (2021)	Data Recovery completed 2021			X			
KEN-00742	Pre/ Proto-historic	2020	Eligible (2021)	Data Recovery completed 2021			X			
KEN-00743	Pre/ Proto-historic	2020	Eligible (2021)	Avoidance		X	X			
KEN-00744	Pre/ Proto-historic	2020	Eligible (2021)	Data Recovery		X	X			
KEN-00746	Pre/ Proto-historic	2020	Eligible (2021)	Data Recovery completed 2021		X				
KEN-00755	Pre/ Proto-historic	2021	Eligible (2022)	Avoidance					X	
KEN-00756	Pre/ Proto-historic	2021	Recommended Not Eligible (2022)	N/A Recommended Not Eligible					X	
KEN-00757	Pre/ Proto-historic	2021	Eligible (2022)	Avoidance					X	
KEN-00758	Pre/ Proto-historic	2021	Eligible (2022)	Avoidance					X	
KEN-00759	Pre/ Proto-historic	2021	Eligible (2022)	Avoidance					X	
KEN-00760	Pre/ Proto-historic	2021	Eligible (2022)	Avoidance					X	
KEN-00761	Historic	2021	Eligible (2022)	Avoidance					X	
SEW-00363	Pre/ Proto-historic	1986	Eligible (1980)	Data Recovery completed 2022	X					
SEW-00364	Historic	1986	Eligible (1987)	Mitigation measures outlined in PA	X		X	X		
SEW-00973	Pre/ Proto-historic	2000	Eligible (2007)	N/A; site incorrectly plotted	X					
SEW-01195	Historic	2004	Not Eligible (2011)	N/A Not Eligible			X			
SEW-01198	Historic	2004	Not Eligible (2007)	N/A Not Eligible				X		X
SEW-01218	Historic	2005	Unevaluated	N/A, historic-era trail	X		X	X		X
SEW-01258	Pre/ Proto-historic	2005	Eligible (2007)	Avoidance	X		X			
SEW-01261	Historic	2005	Not Eligible (2011)	N/A Not Eligible			X	X		
SEW-01262	Historic	2005	Not Eligible (2011)	N/A Not Eligible	X					
SEW-01268	Historic	2005	Eligible (2007)	N/A (see SEW-01261)	X	X				X
SEW-01270	Pre/ Proto-historic	2005	Eligible (2007)	N/A; site incorrectly plotted	X					
SEW-01439	Pre/ Proto-historic	2009	Eligible (2010)	Data Recovery completed in 2022			X	X		

AHRS Number	Site Type	Year First Recorded	Eligibility Status (and year)	Mitigation (2023)	USFS	USFWS	State of AK and/or DOT&PF ROW	KPB	CIRI	Private
SEW-01629	Historic	2020	Not Eligible (2021)	N/A Not Eligible	X					
SEW-01630	Historic	2020	Not Eligible (2021)	N/A Not Eligible	X					
SEW-01631	Pre/ Proto-historic	2020	Eligible (2021)	Monitoring	X					
SEW-01755	Historic	2021	Recommended Not Eligible (2022)	N/A Recommended Not Eligible			X			
SEW-01756	Historic	2021	Recommended Not Eligible (2022)	N/A Recommended Not Eligible			X			X
SEW-01757	Historic	2021	Recommended Not Eligible (2022)	N/A Recommended Not Eligible				X		
SEW-01758	Historic	2021	Recommended Not Eligible (2022)	Avoidance				X		
SEW-01759	Historic	2021	Recommended Not Eligible (2022)	Avoidance				X		
SEW-01760	Historic	2021	Recommended Not Eligible (2022)	N/A Recommended Not Eligible			X	X		
SEW-01761	Historic	2021	Eligible, contributing feature to SEW-01268 (2022)	Monitoring	X					

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Attachment D:
Curation Agreement

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**Attachment E:
AHRIS Site Mapbook**
