

Annual Monitoring Report

Alaska Federal-Aid Highway Program Section 106 PA October 1, 2023 - September 30, 2024

Prepared by the
Alaska Department of Transportation & Public Facilities
Statewide Environmental Office

for submission to the
Federal Highway Administration Alaska Division,
the Advisory Council on Historic Preservation, and
the Alaska State Historic Preservation Officer



May 13, 2025

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1.0 Introduction

This report summarizes the Alaska Department of Transportation & Public Facilities' (DOT&PF) Federal Fiscal Year (FFY)24 implementation of the *First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the Alaska State Historic Preservation Officer, and the Alaska Department of Transportation and Public Facilities Regarding Implementation of Section 106 of the National Historic Preservation Act for the Federal-Aid Highway Program (FAHP) in Alaska* (106 PA), executed November 1, 2017¹.

DOT&PF has assumed the Federal Highway Administration's (FHWA)'s responsibility for environmental reviews (including Section 106 reviews) for FAHP projects under the 23 U.S.C. 327 NEPA Assignment Program (NEPA Assignment Program) as outlined in a Memorandum of Understanding (MOU).² Under this program, the FHWA retained responsibility for government-to-government (G2G) consultation with Tribes. NEPA Assignment Program projects are referred to in this report as "assigned projects" while any FAHP projects excluded from these programs in the past are referred to as "non-assigned projects." During FFY24, all but one (a streamlined review) projects processed under the 106 PA were assigned projects.

The 106 PA recognizes the DOT&PF's existing assumption of Section 106 responsibility for assigned projects.³ The 106 PA also creates a streamlined review process for Programmatic Allowances, which are undertakings that have low potential to affect historic properties. Programmatic Allowances fall into two tiers, Tier 1 and Tier 2, and must meet specified conditions to qualify for streamlined review. These reviews are carried out internally and documented by the DOT&PF cultural resources staff, who are professionally qualified individuals (PQIs) meeting the Secretary of the Interior's Professional Qualifications Standards. This review process is outlined in the 106 PA's Appendix B.⁴ Projects that do not qualify for streamlined review are processed through standard Section 106 consultation, described in Appendix D of the 106 PA.

The 106 PA requires the DOT&PF Statewide Environmental Office (SEO) to conduct annual program monitoring and prepare an annual report. This report, prepared to satisfy those

¹ This agreement replaced the October 14, 2014 *Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the Alaska State Historic Preservation Officer, and the Alaska Department of Transportation and Public Facilities Regarding Implementation of Section 106 of the National Historic Preservation Act for the Federal-Aid Highway Program (FAHP) in Alaska* (2014 106 PA).

² *Memorandum of Understanding between Federal Highway Administration and the Alaska Department of Transportation and Public Facilities concerning the State of Alaska's Participation in the Surface Transportation Project Delivery Program Pursuant to 23 U.S.C. 327.* (For more details on the NEPA Assignment Program, see <http://www.dot.state.ak.us/stwddes/desenviron/resources/nepa.shtml>.) Prior to the NEPA Assignment Program, DOT&PF operated under a previous assignment program delineated in a 2015 *Memorandum of Understanding between Federal Highway Administration Alaska Division, and the Alaska Department of Transportation and Public Facilities, State Assumption of Responsibility for Categorical Exclusions*. This earlier program was referred to as the 6004 program, as seen in previous Section 106 PA Annual Reports.

³ In addition, the 106 PA delegates most aspects of the FHWA's role in the Section 106 process to the DOT&PF for FAHP projects that may not be covered under the NEPA Assignment Program.

⁴ Projects qualifying for streamlined review as Programmatic Allowances must meet criteria detailed in 106 PA *Appendix B*, including all relevant conditions. Under both Tiers, projects are screened by PQIs, with Tier 2 projects requiring additional screening and conditions. Projects with a combination of Tier 1 and Tier 2 activities are considered Tier 2 projects.

requirements, includes: 1) summaries and complete lists of the undertakings processed under the 106 PA; 2) program review observations; and 3) recommendations for improving implementation of the agreement.

This report covers the federal fiscal year period from October 1, 2023 through September 30, 2024, and fulfills the annual reporting requirement under *Stipulation IX.D.2*.

2.0 Summary of Undertakings Processed under the 106 PA

This summary is prepared with data from an electronic database which was established by the SEO in December 2014 to provide statewide tracking information on compliance with Section 106 and the Alaska Historic Preservation Act (AHPA). The Section 106/AHPA database focuses on collecting information to satisfy reporting requirements, and it is not intended to replace necessary documentation in project files. The database is structured with a records folder for each region and the SEO. Each PQI enters data as various federal and state projects are processed. During the reporting year, DOT&PF transitioned from use of this Access database to an electronic business process management (BPM) system.

2.1 Project Totals and Comparisons by Type

Altogether, 74 project reviews were completed under the 106 PA (see Table 1 and Figures 1 through 4). The total consists of projects which had Section 106 reviews completed during the reporting year.⁵ Review totals also include updates to previously processed projects, when a re-evaluation or change in proposed work necessitated further Section 106 consideration.

The summary in Table 1 is sorted by the type of review process applied. Note that all projects processed under the 106 PA during the FFY24 reporting year were assigned under the NEPA Assignment MOU. The “Streamlined Reviews” column refers to projects qualifying for Programmatic Allowance Tier 1 or Tier 2. The “Standard Consultation” column refers to the remaining projects which followed the Section 106 process under Appendix D.

Table 1: Number of Project Reviews Completed Under 106 PA

Project Review Applicable Tier or Finding	Streamlined Reviews	Standard Consultation	Total
Tier 1	12		12
Tier 2	37		37
No Historic Properties Affected		18	18
No Adverse Effect		4	4
Adverse Effect		3	3
Total	49	25	74

Figures 1 through 3 present numbers and percentages for the Alaska FAHP as a whole.

⁵ In the FFY15- FFY23 report tallies, undertakings, or “projects” were defined as those having a completed Section 106 action: either a streamlined review, or a standard consultation finding. If a project had more than one completed Section 106 action in the reporting period, each was counted for reporting purposes. The FFY24 report retains this approach.

Figure 1. Federal-Aid Projects by Finding

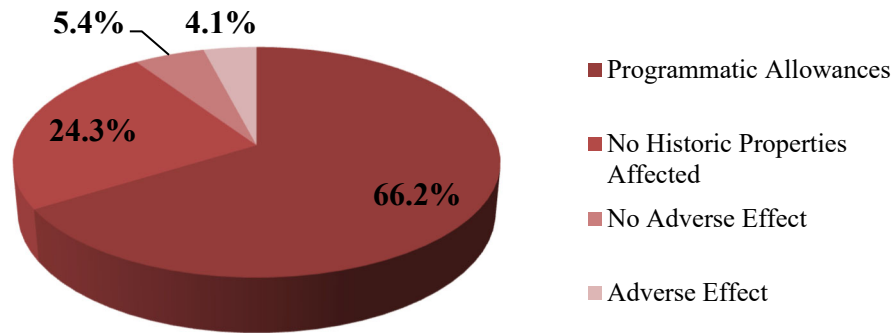


Figure 2. Federal-Aid Projects by Programmatic Allowance Tier

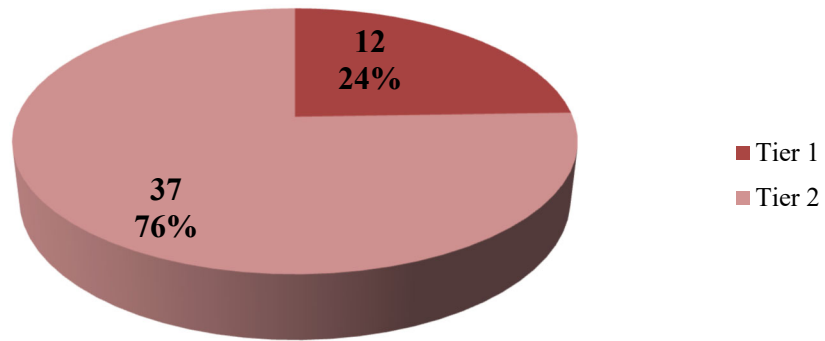
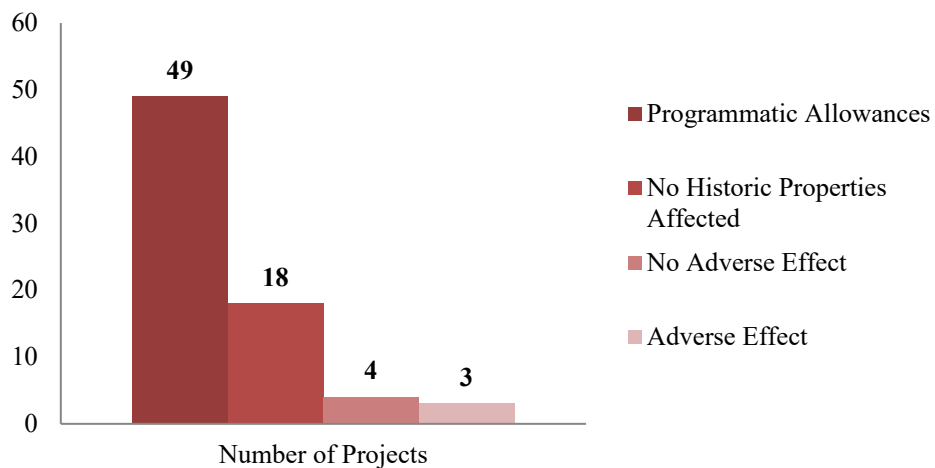


Figure 3. Federal-aid Projects by Finding



The Section 106 consultations for the overall Alaska FAHP resulted in 18 findings of No Historic Properties Affected, 4 findings of No Adverse Effect, and 3 Adverse Effect findings (the adverse effect findings letters were written to provide updates to previous findings of adverse effect for three separate projects, one in each region). The number of projects with a completed Section 106 action under the 106 PA dropped from 155 last year and was similar in number to the total from FFY2020 (n=90). It is important to note that number of projects with completed 106 actions is not a direct correlate for PQI workload. Although the number of completed actions is roughly half of last year, PQIs' workload included several complex projects, multiple agreement documents, and other time-intensive tasks for FHWA projects, as well as their work for projects funded by other federal and state agencies.

Like other years' reporting results, in FFY24 there was a larger proportion of streamlined review projects (49) than Section 106 consultations (25). The overall percentage of streamlined reviews was 66% of the total project reviews under the 106 PA. The percentage of streamlined reviews conducted since the inception of the 106 PA has ranged from 58% to 79%, putting this year's total somewhere in the middle in terms of percentages. Most of the FFY24 streamlined reviews qualified under Tier 2 (76%), which is comparable to previous years (FFY15 [72%], FFY16 [66%], FFY17 [65%], FFY18 [73%], FFY19 [80%], FFY20 [77%], FFY21 [76%], FFY22 [93%], and FFY23 [77%]). This preponderance of Tier 2 projects within the streamlined review category reflects the fact that it is more common for minor scope projects to exceed Tier 1 limitations because they also provide modest design improvements, which triggers Tier 2 review.

Tier 2 allows certain listed projects to be processed after PQI review of applicable conditions, including location-specific conditions. Some projects may not qualify for Tier 2 and must proceed to standard consultation. Because Tier 2 qualification depends on this case-by-case review, the proportion of projects that qualify for streamlined review was expected to vary moderately from year to year depending on individual project locations.

Out of the 74 total projects completed during the reporting year, 28 were updates of projects that had undergone Section 106 review at various times in the past. Of these 28, 10 were updated through standard consultation and 18 were updated through streamlined review. Table 2 shows how these updates compare to the total numbers of projects processed by each method.

Table 2: Project Updates Compared to Total Projects

Update Type	# Updates Processed	Total Projects (Updates + New)	Updates as Percent of Total Projects
Standard Consultations	10	25	40%
Streamlined Reviews	18	49	37%
Combined Total	28	74	38%

Figure 4 represents the proportion of updates compared with the total numbers of projects.

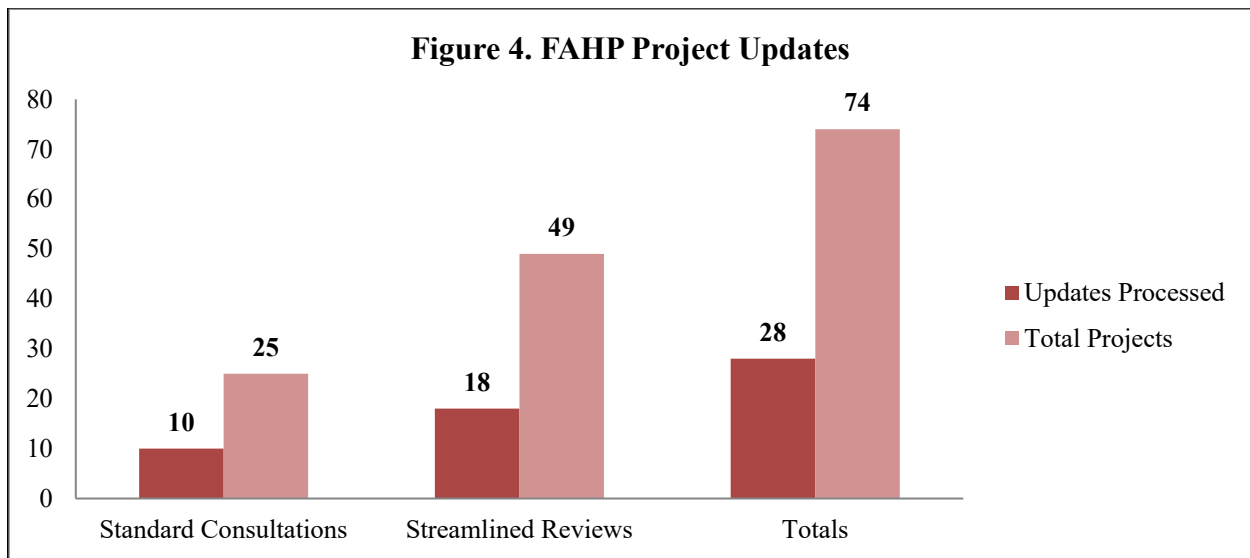
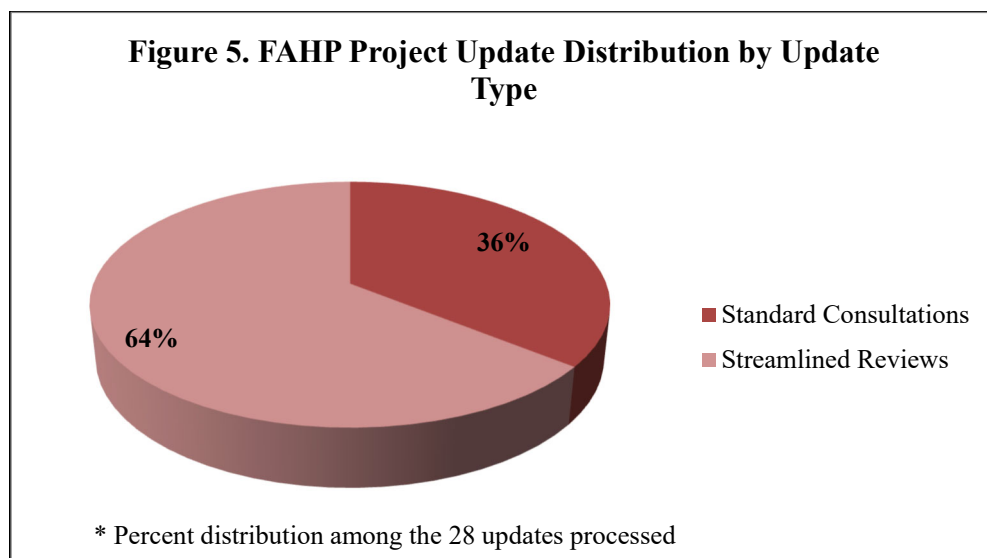


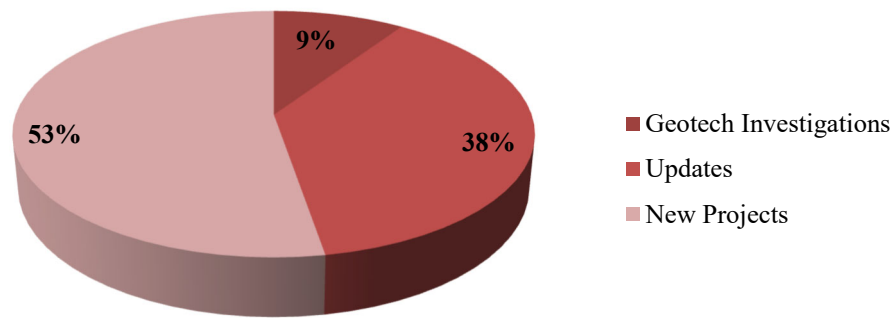
Figure 5 compares the set of updated projects according to the method used for the update.



These re-evaluations and updates represent a significant portion of all projects processed under the 106 PA during the reporting year, accounting for over a third (38%) of all projects, and again roughly a third (37%) of all streamlined reviews. The reduced processing timeline for updates that qualify for streamlined review continues to be beneficial when modest design adjustments occur following the initial Section 106 review.

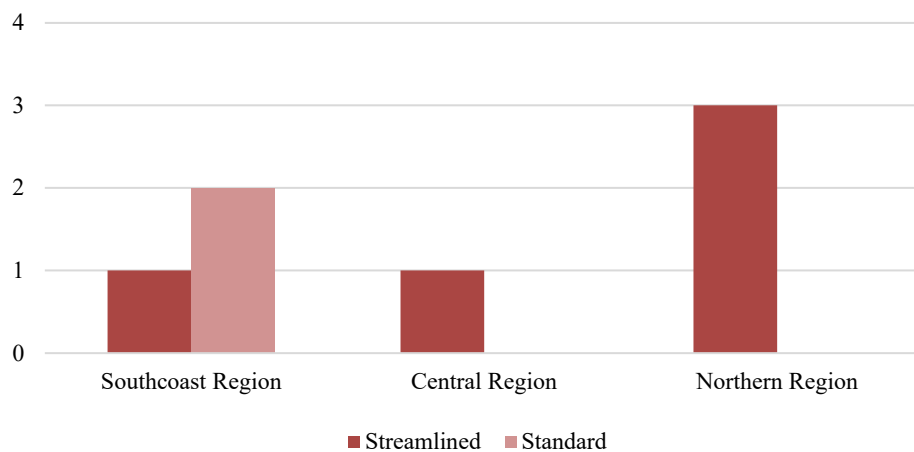
A time savings is also gained when using streamlined reviews for geotechnical (geotech) investigations. The Appendix B Tier 2 list allows geotech investigations which meet the applicable conditions to proceed as streamlined reviews. Geotech projects accounted for 9% of the total projects processed during FFY24 (Figure 6). Of the seven standalone geotech investigations processed, all but two qualified for streamlined review (Figure 7). In terms of streamlined review, geotech projects accounted for 10% of all projects processed with programmatic allowances.

Figure 6. FAHP Project Distribution by Process Type



* Percent distribution among the 74 projects processed

Figure 7. FAHP Geotech Projects by Region and Type



2.2 Project Listing Information

Complete lists of projects processed under the 106 PA for each of the three regions and the SEO are enclosed in Appendix 1. The lists are divided into streamlined and standard consultation groups, and then subdivided by region.

Lists provide the following information:

- Project Name
- Alaska State Accounting System (AKSAS) Number
- Federal Project Number
- Process Type (new project, update, or geotech)
- Project Description

Streamlined project lists also include:

- Applicable Tier 1 and 2 Activities: The alpha-numerical entries in this column identify specific project activity classifications from the tables of the *Appendix B Programmatic Allowances*.
- Review Screening Record Approval Date: indicates the PQI signature date of screening approval (documented in the project file on the Streamlined Project Review form of the 106 PA *Appendix C*).

Standard consultation project lists indicate:

- Project Finding
- Finding Letter Date

Since the 106 PA also requires semiannual reporting of streamlined projects under *Stipulation IX.D.1.a*, during FFY24 DOT&PF had previously submitted two *Semiannual Tracking of Tiers 1 and 2 Undertakings* reports to the FHWA and the State Historic Preservation Officer (SHPO) covering October 1, 2023 to March 31, 2024, and April 1, 2024 to September 30, 2024. The streamlined project portion of the lists appended to this report is a compilation of these previously submitted semiannual lists.

3.0 Program Observations

This year's program review reporting is based on information gathered from the statewide database, and from ongoing communication with PQIs, including cross-regional coordination through the Cultural Resources Team (CRT) during the year. The CRT consists of the DOT&PF Statewide Environmental Program Manager and the PQIs from each of the three DOT&PF regions and the SEO. The Cultural Resources Liaison from the Office of History and Archaeology (OHA) is also a member. The CRT meets monthly via Microsoft Teams to discuss Section 106 processing issues and DOT&PF cultural resources management program goals.

In addition, a more detailed review was also carried out on a randomized selection of projects, to assess conformance with procedures and adequacy of documentation. Thirty-eight projects were selected for monitoring review. The number chosen for review reflects approximately 50% of the total processed during the reporting period. Each project was reviewed by a member of SEO's cultural resources staff. The results are presented in Appendix 2. A summary is included at the end of this section.

3.1 Accomplishments

General PA Operation

Overall, DOT&PF continues to operate successfully under the 106 PA to efficiently and effectively advance project development. PQIs have in-depth knowledge of the PA from experience, analysts are familiar with the 106 PA, and other DOT&PF staff continue to grow in knowledge of PA processes. Region PQIs, SEO, and the OHA Cultural Resources Liaison coordinate when implementation questions arise on individual projects.

Section 106/AHPA Electronic Database and BPM Transition

The electronic Access database was created in late 2014 to track Section 106 processing under the 106 PA and can also be used to track Section 106 or AHPA outcomes for other DOT&PF projects (state and other federal agency funded). PQIs enter project reporting information for their respective regions. The database has been a helpful tool in developing the semiannual

reports and this annual report. SEO reviews draft reporting information with each PQI for quality control prior to finalizing project lists for these reports.

In November 2020, DOT&PF implemented a NEPA electronic database and file storage system referred to as the DOT&PF BPM (Business Process Management) system. After years of development, DOT&PF implemented a Section 106 component for the BPM system during FFY24; this system will replace the existing Section 106 Access database. The BPM system allows for the creation of streamlined review forms for standard consultation data entry. Because streamlined review forms are created within the system, this eliminates the need for PQI data entry of streamlined form data, which is a time savings tool. SEO will use querying features of the BPM to generate reports to allow for tracking and analysis. DOT&PF consulted with SHPO and FHWA to adjust Appendix C during FFY24 to reflect the appearance of the BPM-generated form. The form is essentially the same in content as the previous version of the form.

OHA Project Funding

Under 106 PA *Stipulation III.B.7*, DOT&PF pursued Federal-Aid Highway Program funding for maintenance and continued development of the Alaska Heritage Resources Survey (AHRs) database and for the OHA Cultural Resources Liaison position.

3.2 Administrative Documentation Requirements

Stipulation V.B of the 106 PA states that copies of streamlined review forms for region projects will be sent to Regional Environmental Managers (REMs) and SEO PQIs, and to the region PQI in the case of statewide projects. Consultation letter templates indicate that an SEO PQI is to be copied on the letter and enclosures. No issues were observed with this process throughout the reporting period, with all PQIs maintaining good communications with SEO.

3.3 Emergency Situations

DOT&PF responded to multiple emergency situations occurred during the current reporting year.

Northern Region (NR) had one emergency during FFY24. In June 2024, a 500-foot long landslide occurred at MP 0.5 of McCarthy Road as a result of permafrost melting. The melting caused an ice lens to collapse, which caused the road to subside, and rendered the road unpassable at that location.

Central Region (CR) had one emergency during FFY24. In May 2024, several large rocks fell on to the Glenn Highway at MP 86.1 from the eroding slopes above. DOT&PF maintenance and operations (M&O) personnel removed the rockfall, but noticed several other boulders that were perched on the slopes above that could fall at any time. M&O determined that an emergency effort to remove the remaining boulders, stabilize the slope using attenuator nets, and install concrete barriers along the base of the slope would be necessary to protect the traveling public. The project APE was within the boundaries of the Long Lake Archaeological Historic District. Consultation letters were sent out in 2024.

Southcoast Region (SR) had three emergencies during FFY24. In November 2023, excessive rain caused a landslide, which covered the Zemovia Highway between MP 11 and 11.8 in Wrangell, Alaska. The Landslide buried and displaced three properties and caused five fatalities.

In January 2024, a storm event caused a concrete floating breakwater to sustain serious damage in Tenakee Springs, Alaska. The storm caused the chains, which anchor the breakwater to the seafloor to break, and caused the connection joints between breakwater sections to fail.

In August 2024, the Jordan Creek culvert, which is located along the main segment of the Glacier Highway between Jordan Avenue and Cascade Creek in Juneau, Alaska failed. The culvert failure forced DOT&PF to restrict traffic flow in that area to just one-lane and impose a load rating limit of three-tons, which meant that only one three-ton truck could cross above the culvert at one time. The culvert failure severely restricted traffic flow in the high-density portion of the Glacier Highway.

In all instances, DOT&PF PQIs informed SHPO of the emergency event and coordinated closely with regional personnel on the response efforts.

3.4 Post-Review Discoveries

One post-review discovery was reported during FFY24. In Southcoast Region, construction contractor SECON found a bone while excavating a culvert to be repaired at the intersection of F St. and Third Avenue (Juneau-Douglas Highway) on June 24, 2024. The bone was photographed and reburied at the excavation site, which was closed up and paved over before DOT&PF received proper notification. Photographic analysis revealed the bone was an animal bone from a large mammal. DOT&PF consulted with SHPO and the Douglas Indian Association and an archaeological monitor was hired to reopen the site and assess the discovery area for additional materials or potential archaeological site, along with a Tribal Monitor and a DOT&PF PQI. This work revealed additional animal bones (deer and domestic cattle) and isolated materials (fragments of glass, ceramics) and concluded that fill material used during earlier construction of the road was old beach material containing isolated tidally deposited historic-era fragments, and did not constitute an archaeological site.

3.5 PQI Staffing and Approval Role under the PA

The 106 PA Stipulation II.A notes that the DOT&PF commits to employing PQIs at each of the three regions and the SEO. Appendix E defines the DOT&PF PQI professional qualifications and lists training requirements. Training is discussed further in Section 4.7.

The 106 PA *Stipulation IX.A.2* and Appendix E require PQI approval of Section 106 project documentation. All Section 106 reviews undertaken by the DOT&PF under the 106 PA are executed by the PQIs. PQIs sign all initiation and findings letters as well as all streamlined review forms. They review the accompanying materials and assist project teams in coordination with cultural resources consultants to prepare surveys and Section 106 documentation.

This stipulation and appendix also require that when the PQI responsible for project review requires cultural resource expertise outside his/her area of specialty, he/she must either consult with a different PQI who has that expertise, or request assistance from OHA staff. The PQIs have contacted OHA throughout the reporting year, as appropriate. The FFY24 monitoring review included a checklist question on this topic; no issues were observed. This situation most often occurs when a PQI qualified in History coordinates with a PQI qualified in archaeology to complete a streamlined review form. This topic will continue to be included in the annual refresher training.

During this reporting year, Central Region (CR) maintained its team of two PQIs, assisted by an SEO PQI for the large and time-consuming Sterling Highway Project.

Southcoast Region (SR) maintained its PQI during the reporting year. Additionally, recognizing the high environmental workload, SR hired an additional Regional Environmental Manager (REM). With this additional hire, SR's REM with PQI qualifications was able to assist with some cultural resources work, alongside the region's dedicated PQI.

Northern Region (NR) began the reporting year with a PQI vacancy. SEO assisted the region with cultural resources work, along with a NR analyst with PQI qualifications. A new regional PQI was hired in August 2024; unfortunately, the new hire left DOT&PF in October 2024 for a higher paying job. This illustrates the difficulty of recruiting and retaining professionally qualified cultural resources staff, with a shortage of professionally qualified cultural resources staff in Alaska and nationally.

The SEO also had turnover in its cultural resource specialist/PQI position, with an incumbent transitioning in January 2024 to fill the role of Acting Cultural Resources Manager. The position remained vacant through August 2024. At this time, DOT&PF eliminated the former cultural resources specialist position and created an additional Cultural Resources Manager position. The Cultural Resources Manager duties were split into two, with one CRM focusing on FHWA projects and the other focusing on FAA and other agency projects, as well as state-funded projects. Both these roles were filled by experienced DOT&PF PQIs.

Even when all existing positions are fully staffed, PQI workloads are considerable, extending beyond FAHP projects to include cultural resources assistance to multiple other programs, such as FAA, Federal Transit Authority (FTA), MARAD, and State projects. While this challenge has yet to be resolved, the topic of consultant assistance is sometimes raised, and briefly discussed below.

While consultants are invaluable for completion of field studies and cultural resources support, consultant products require careful review by PQIs, review that is sometimes extensive and iterative depending on the experience and skill level of the consultant. Experience has shown these can be time-consuming reviews. Additionally, limited availability of cultural resource staff has become problematic within Alaska and the lower 48, as the amount of cultural resource management work has outpaced the availability of SOI-qualified individuals.

At the same time, with PQI workload pressure and the occasional vacancies, some regions have also tasked consultants with drafting Section 106 consultation letters, with PQIs remaining responsible to edit and finalize them for acceptance and PQI approval signature. At least one region has found that this approach is not efficient for them, since review and adjustments take more time than the PQI would spend developing the letter.

SEO supports regional PQI recruitment to assist in filling vacancies as quickly as possible. PQI retention and training is important to the success of the 106 PA and to efficient and timely project delivery. The PQI approval role is key to the implementation of the 106 PA.

3.6 Project Updates

Projects may require Section 106 updates during subsequent project development and construction. During this reporting year, updates comprised a third (38%) of the projects processed. While some updates required additional consultation under the Appendix D standard consultation protocol, the majority of updates (roughly 64%) qualified for streamlined review.

The reduced processing timelines for updates which qualify for streamlined review continues to be a substantial benefit to project timelines when design adjustments are identified after the initial Section 106 review. While this benefit is not fully quantifiable and varies case-by-case, a general calculation of the number of streamlined updates (18) this year and the typical review time saved for each (30 days) results in potentially 540 project development days saved, in addition to workload reduction for DOT&PF and OHA PQIs.

3.7 Public Objections and Consulting Party Requests for Information

The reporting database did not indicate any Section 106 objections from the public for FAHP projects which were processed under the 106 PA during this reporting period. The database indicated that consulting parties, including SHPO, responded to one project with substantive comments and seven with requests for more information. These requests were handled with the preparation of updated findings letters.

3.8 Resolution of Adverse Effects

Projects processed during the FFY24 reporting year included three findings of adverse effect. These were all update letters for projects that had previously undergone consultation for adverse effects (one from each region).

NR submitted an updated finding of effect letter for the Alaska Highway Johnson River Bridge Replacement project during the reporting year. DOT&PF is currently consulting on a Programmatic Agreement (PA) to resolve the adverse effect for the Alaska Highway Johnson River Bridge project (NFHWY00743); as well as to consider effects related to the replacement of two additional bridges (Gerstle River and Robertson River) along the Alaska Highway. DOT&PF submitted a Rehabilitation Assessment to consulting parties in FFY2024, which looked at the feasibility of preserving one or all three of the Alaska Highway Bridges. Consultation on the PA continues. DOT&PF is currently consulting on a PA to resolve that adverse effect, as well as to consider effects related to the replacement of two additional bridges (Gerstle River and Robertson River) along the Alaska Highway.

In CR, The Sterling Highway MP 45-60 project submitted one update during the reporting year (August 12, 2024). As noted in previous years, the Sterling Highway MP 45-60 project has a PA for its Section 106 compliance (amended PA executed on July 25, 2023). CR produces a separate annual report for that PA. The Sterling Highway MP 43-60 Project data recovery continued in May and June of 2024 with excavations at two sites (KEN-00215 and SEW-01758); the project also included cultural resources field survey and archaeological monitoring. Progress continues for the development of an MOA between Kenaitze Indian Tribe and DOT&PF for Kenaitze to complete the digitization of oral histories in the Kenaitze archive. State of Alaska Department of Natural Resources Interpretation and Education Unit continues to work on a Master Interpretive Plan for the Project. The Project has identified an appropriate researcher for the Professional Publication which will compile and synthesize the exiting research and

investigation of the Squalantnu Archaeological District. Tribal observers continue to participate in the data recovery and archaeological monitoring activities.

SR submitted an updated finding of effect letter for the Haines Highway Reconstruction Milepost 3.9 to 25.0 (Z686060000) project in April 2024. Additionally, work on agreement documents for two other projects in SR occurred during the reporting year. As per the mitigation measures described in the project Memorandum of Agreement, data recovery for the Skagway State Street Pavement Rehabilitation project (Z680850000) occurred in May of 2024. Twelve locations within the Project APE, along State Street, were identified for data recovery in consultation with the signatories and the invited signatory. In 2024, 10 of the locations were excavated with either 1m x 1m excavation units, 0.5m x 1m units, or a trench. Two of the designated locations were not excavated because heavy equipment is necessary to remove pavement or sidewalk. These two areas will be excavated in 2025 in conjunction with the construction season at which time heavy machinery will assist with the removal of the concrete/pavement. The data recovery report is in process with DOT&PF expecting to receive a draft during FFY25. Another project, the Sitka Seawalk Phase II project (SFHWY00312), completed an updated findings letter for an adverse effect to the Sitka Harbor Complex (SIT-01151) at the beginning of FFY25 after discussions with consulting parties at the end of FFY24. Consultation throughout FFY24 and FFY2025 included the addition of the Sitka Historic Preservation Committee and the Sitka Maritime Heritage Society. A signed MOA is expected in FFY25, with construction of Section 2 of Phase II is scheduled for 2025 and the data recovery mitigation efforts associated with Section 2 will be implemented prior to construction activities.

Appendix D contains a procedural requirement for SEO to participate in adverse effect findings (D.2.a.i), in MOA consultations at SEO discretion (E.1.a), and for approving text of MOAs (E.2.b). These procedures were followed as applicable.

DOT&PF also continues to participate as a consulting party in discussions for an FHWA-led PA relating to the 1993 Glenn Highway MP 35-109 Environmental Assessment. Consultation on this PA is ongoing, and DOT&PF expects to continue as a consulting party, although no communications were received from FHWA regarding this PA during the reporting period.

3.9 Semiannual Tracking Reports of Tiers 1 and 2 Submittals

The semiannual tracking reports for the 106 PA were posted on the DOT&PF website after transmitting them to the Signatories.

<http://www.dot.state.ak.us/stwddes/desenviron/resources/historicproperties.shtml>

3.10 Recommendations from Project Review (Appendix 2)

The monitoring review provided an opportunity to observe how the 106 PA processing evolved and strengthened during the reporting year. Best practice areas included good coordination among PQIs, the OHA Cultural Resources Liaison, and SEO; good work by PQIs in communicating with region staff on the application of the 106 PA, particularly given difficulties posed by staffing gaps; generally strong file documentation; and adherence to the guidelines governing application of Appendix B of the 106 PA for streamlined reviews. SEO has often observed the PQIs engaging professionally and courteously with consulting parties, and on many occasions PQIs have gone the extra mile to respond to requests and coordinate between project teams and consulting parties, even when concerns raised by the public may not be related to cultural resources.

Recommendations include:

Streamlined Reviews

- For Tier 1 projects, PQIs should continue to work with project teams to clarify proposed activities to confirm a project does not necessitate Tier 2 processing.
- PQIs should continue to carefully define and document the Area of Potential Effect (APE) for Tier 2 projects and assess whether projects qualify for Tier 2 or should go to standard consultation.
- The BPM streamlined form was designed to call out all General Conditions during form preparation. Within the BPM, Tier 2 General Conditions should be expanded upon as needed. Tier 1 or Tier 2 allowance-specific conditions should be explained as needed.
- In the case of Geotech streamlined forms, the streamlined review form should clearly indicate what the APE is for the geotechnical activities and if necessary, differentiate this from the larger project APE. For Geotech updates, the new geotechnical work should be clearly differentiated from the original.

Standard Consultations

- PQIs should continue to verify that all required consulting parties are included in correspondence, including Alaska Native Claims Settlement Act (ANCSA) corporations and local governments, and that federally recognized tribes receive letters with the G2G language at all points in the consultation. PQIs should ensure that federally recognized tribes receive the Consultation Options form with initiation letters. SEO will re-examine the Consultation Options form with an eye to making it more useful to recipients. PQIs should review consulting party letters to ensure that letter contents correlate to the recipients.
- Recordkeeping: PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record, and should proofread letters for inclusion of required template information. PQIs should ensure that APE figures use Section 106 terminology and are consistent with the APE delineation in the letter. PQIs should ensure the MOU assignment language is present on all report covers, regardless of internal or external authorship. Regions should send email notifications to SEO when correspondence includes an SEO courtesy copy. When submitting DOEs for built environment properties, PQIs should ensure the historic property boundary has been defined.
- PQIs and environmental analysts should work together to coordinate Section 4(f) applicability with the appropriate NEPA Manager before finalizing findings letters. PQIs should continue to consult with both a Statewide NEPA Manager and the Statewide Cultural Resources Manager before signing findings letters that vary from the protocol in the posted letter templates regarding 4(f) related language.
- SEO, region PQIs, and SHPO should continue to work closely together to ensure that historic roads consideration is implemented efficiently and smoothly into project development. Additional training may be necessary for new staff at either agency regarding the *Methodology* or other historic roads considerations agreed upon during the 2019 transition to including historic roads within the 106 PA.

Project updates

- Updates should continue to clearly delineate what is being updated in the current consultation. This should include not only a narrative description, but graphics that clearly demonstrate the reason for the update. If the update is to provide additional requested information, rather than address a change in project activities or APE, that should be clearly explained in the letter.
- If a gap of five years or more has occurred, PQIs should re-initiate consultation prior to sending an updated findings letter.
- If a letter is prepared to update a project previously processed via streamlined review, the letter should clearly reference the project in its entirety.
- An update letter should clearly state the findings for the project as a whole in the conclusion of the letter, and not exclusively focus the finding on the changed portion or activity of the project.
- If the update letter references a report or other documentation previously sent in with a findings letter, it is best practice to include the report again so that consulting parties have it at hand for review.

4.0 Assessment of Agreement and Recommendations for Continued Implementation

4.1 Annual Program Review Meeting

A draft copy of the annual monitoring report was provided to the PA signatories on January 31, 2025 in accordance with Stipulation IX.D.2.c.i. The Annual Meeting was held on April 11, 2025 in Anchorage with representatives of DOT&PF SEO and OHA attending in person and FHWA and ACHP attending via Microsoft Teams.

The following discussion reflects DOT&PF's assessment and recommendations.

4.2 Overall 106 PA

The 106 PA was designed to be an effective streamlining tool to improve project delivery while ensuring that effects to cultural resources are appropriately considered. The 106 PA appears to be accomplishing the goals of the Signatories.

As DOT&PF has gained experience with streamlined review processing, the review efforts for these projects have taken relatively less of the PQIs' time. Implementation of the 106 PA has generally allowed PQIs to shift more effort from small-scope projects to the substantial Section 106 issues that arise on more complex projects and consultations. This continues to be a key benefit of the PA for both DOT&PF and OHA.

Subjectively, the 106 PA implementation has created closer dialogue among the PQIs and increased consultation between the PQIs and the OHA Cultural Resources Liaison regarding project processing. Since the PA was enacted, it has substantially reduced the time the DOT&PF staff spends preparing consultation documentation, which provides the DOT&PF and the OHA staff with more time to focus on complex projects.

As noted above, DOT&PF has been participating as a consulting party for an FHWA-led PA that may affect projects yet to be constructed from the 1993 Glenn Highway MP 35-109 Environmental Assessment. Among other aspects of the consultation, DOT&PF will carefully monitor how such an agreement may affect and/or interact with the FAHP 106 PA to ensure there are no unanticipated conflicts. No updates were received from FHWA on this PA during the reporting year.

Recommendation: No substantial concerns are identified at this time and the 106 PA should remain in effect. DOT&PF will begin planning and consulting for PA renewal, anticipating the 2027 expiry date, in collaboration with signatories.

4.3 National Environmental Policy Act (NEPA) Assignment Program

On November 13, 2017, DOT&PF began operating under the NEPA Assignment Program established in 23 U.S.C. 327. Under NEPA Assignment, DOT&PF assumed FHWA's environmental responsibilities for Categorical Exclusions, Environmental Assessments, and Environmental Impact Statements; the assigned responsibilities include Section 106 compliance. The NEPA Assignment Program supplanted the previous 6004 Program, under which DOT&PF had assumed FHWA's environmental responsibilities for certain Categorical Exclusion projects.

DOT&PF and its PQIs continue to operate under NEPA assignment, complying with the 106 PA to process projects via streamlined review and standard consultation. SEO works with NEPA Managers to monitor compliance with Section 106 under assignment. The NEPA Assignment MOU was renewed on April 13, 2023.

Recommendation: None at this time.

4.4 Historic Roads Consideration

In February 2019, DOT&PF transitioned from using the separate Alaska Roads PA⁶ to address historic road consideration to incorporating such consideration into the 106 PA.

Streamlined Reviews Appendix B (Streamlined Project Review Programmatic Allowances) provides lists of activities that may be processed through DOT&PF PQI review. In certain circumstances, Appendix B requires additional consideration prior to a decision on whether a project qualifies for streamlined review; this additional consideration is referred to as Historic Roads Analysis (HRA).

Standard Consultation Appendix J (Historic Roads Consideration) establishes protocols for historic road identification and consideration during standard consultations. Appendix J.I outlines scenarios where historic road identification is not necessary. Appendix J.II describes the processes for identification and evaluation of historic roads.⁷ Appendix J also contains a section

⁶ February 23, 2010 *Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the Alaska Department of Transportation and Public Facilities, and the Alaska State Historic Preservation Officer Regarding Alaska's Highway System Roads Affected by the Federal-Aid Highway Program in Alaska*. The Alaska Roads PA sunsetted on February 23, 2019; at that time, revisions to the Section 106 PA's appendices went into effect to address historic road consideration.

⁷ If a DOE is needed, preparers must follow the *Alaska Roads Methodology for Assessing National Register of Historic Places Eligibility*, which provides a sequential process for assessing National Register of Historic Places eligibility of individual roads. This methodology, prepared for DOT&PF by Mead & Hunt, 2014, is available on the

on assessing effects to eligible roads (J.III) and resolving adverse effects (J.IV). Appendix J.V. contains details on transitional processes, including a transitional allowance for projects in development at the time of the historic roads transition. As of FFY24, we are generally seeing new projects with the transitional allowance not applicable.

Recommendation: DOT&PF will offer training and resources as needed to new hires at DOT&PF and OHA who began working after the 2019 historic roads training.

4.5 Updates to Programmatic Allowances Streamlined Reviews

No additions or edits were made to programmatic allowances during the past reporting year. One region has expressed interest in developing an allowance or an approach tailored to material site reviews. Other regions have requested investigating the possibility of including an allowance to address winter trail markers which will be placed on top of the ground surface, as well as minor repairs to ferry vessels. SEO has also received a suggestion to accommodate mowing of medians under Tier 1.

Recommendation: DOT&PF will set up a meeting with SHPO and FHWA to discuss these potential inclusions in more detail and will continue to propose revisions to Appendix B (Programmatic Allowances) and Appendix C (Streamlined Project Review Form) in consultation with SHPO and FHWA when pertinent topics arise. DOT&PF has been working collaboratively with other agencies such as FTA and MARAD on ferry work and plans to involve PQIs from SR to discuss potential additional allowances related to ferries.

4.6 Geotech Investigations

As discussed earlier in this report, the geotech Tier 2 allowance provided helpful time savings during the past reporting year. Seven standalone geotech investigations were processed during FFY24 and the programmatic allowance was used five of those investigations; using the standard 30-day period as a time estimate, the allowance saved an estimated 150 project days of wait time prior to geotech being conducted.

4.7 Training Requirements

Training requirements are outlined in the 106 PA's Appendix E. As indicated during past annual meetings, there may be a need to adjust Appendix E. II in the future to account for funding, include other options for analysts, and address timing concerns and limitations on travel and in-person gatherings.

Discussions in past annual meetings have explored ideas for lower-cost training options, including online course modules. DOT&PF's online training module for the Cultural Resources chapter of the Environmental Procedures Manual (EPM) is available for viewing by DOT&PF environmental staff as well as consultants and other interested parties. OHA has also regularly advocated for advanced training opportunities for PQIs, and for PQIs to have more institutional support to attend training and professional development sessions. As one example, OHA suggested that DOT&PF consider the annual OHA cultural resources practitioners' workshop (held annually in spring) as a training opportunity for PQIs from all regions.

This reporting year staff continued to take advantage of the increased online opportunities which have arisen since the start of the COVID-19 pandemic. OHA resumed their annual workshop traditionally held in person in Anchorage each year while continuing its virtual education series with additional Microsoft Teams-based webinars. A number of PQIs were able to attend the in-person workshop and/or the webinars. Remote working groups such as the CRT continued to serve as venues for communication and informal training by SEO. The AASHTO (American Association of State Highway and Transportation Officials) cultural resources subcommittee's annual fall 2024 meeting was held virtually, allowing SEO cultural resource staff to attend these events.

SEO is again coordinating with Terry Klein, formerly of SRI Foundation, for a distance-delivery training session for analysts, PQIs, and project managers covering the general Section 106 process and the Section 106 PA. This course is scheduled for FFY25, in February 2025. This course will be organized to have a Day One that covered general background suitable for a wide audience, and a more focused Day Two for the practitioners that work with details. The course is organized in a format which encourages audience participation and questions, in order to allow for learning opportunities prompted by DOT&PF experience in addition to the course material.

Many PQIs were also able to attend the February 2024 in-person annual meeting of the Alaska Anthropological Association in Fairbanks, and/or in-person training sessions offered in Anchorage by NPI in October 2024. The March 2025 annual meeting of the Alaska Anthropological Association will be held in Anchorage.

Virtual on-demand trainings are also available and encouraged. The ACHP offers both on-demand webinars and digital classroom workshops and FHWA has recently debuted a Section 106 training module. SEO recommends these trainings to regions when new hires come on board.

The monthly CRT staff meetings also provide a regular opportunity for informal discussions and clarifications on Section 106 processing under the PA, as needed.

Recommendations: SEO will work with new PQIs when hired at NR, and analysts anticipated to become SOI-qualified in FFY25, to provide training and support throughout the upcoming year. DOT&PF will continue to explore options for introductory Section 106 training for new analysts, and will seek opportunities to strengthen multi-year Section 106 training planning, and will also encourage analysts, PQIs, and project managers to attend relevant ACHP online courses, in particular, [*Early Coordination with Indian Tribes for Infrastructure Projects*](#), as well as completing the online FHWA Section 106 training.

SEO will continue to emphasize the importance of PQI advanced training and professional development opportunities to DOT&PF management. Such training provides benefits to DOT&PF not only from strengthening staff expertise and retention, but also through the opportunities for inter-agency engagement which builds cooperating agencies' confidence in DOT&PF cultural resource capabilities. This in turn pays dividends in strengthening the Department's relationship with other agencies and can expand opportunities for time-and-cost-saving streamlining. DOT&PF, OHA, and FHWA may continue discussions on adjustments to Appendix E. II.

4.8 STIP Funding

Under 106 PA *Stipulation III.B.7*, DOT&PF offers to pursue federal STIP funding for the Alaska Heritage Resources Survey (AHRs) database program and the OHA Cultural Resources Liaison position. The AHRs MOU between DOT&PF and OHA was renewed on July 31, 2023. Having a liaison at OHA continued to prove invaluable for project efficiency and delivery. Partially funding the AHRs provides a great benefit to DOT&PF in that increased efficiency for AHRs users helps with more efficient project execution.

Recommendation: DOT&PF has requested STIP funding through FFY 2027 and will continue to pursue STIP funding for both programs and will continue to work together with OHA to maximize the efficacy and benefit of these programs.

5.0 Conclusion

The DOT&PF SEO looks forward to working with the FHWA and the SHPO on the recommendations offered within this report to strengthen the Section 106 program through the successful implementation of the 106 PA. The ongoing processing of projects under the 106 PA, with the close coordination of and consultation with the OHA Cultural Resources Liaison, fosters productive professional discussions and a strong partnership between agencies. The 106 PA, enhanced by annual meetings with SHPO and FHWA, and the ACHP when their schedule allows, has helped the DOT&PF to better assess project effects on historic properties, while enabling the successful and expedited delivery of FAHP transportation projects to Alaskans. During FFY25, DOT&PF plans to begin working with the signatories in preparation for amending the PA, as needed, to extend its life past the 2027 expiry date.

Appendix 1: Project Lists

This Appendix provides lists of projects processed under the 106 PA for each of the three regions and by SEO. The lists are divided into streamlined and standard consultation groups, and then subdivided by region.

Lists provide the following information:

- Project Name
- Alaska State Accounting System (AKSAS) Number
- Federal Project Number
- Process Type (new project, update, or geotech)
- Project Description

Streamlined project lists also include:

- Applicable Tier 1 and 2 Activities: The alpha-numerical entries in this column identify specific project activity classifications from the tables of the *Appendix B Programmatic Allowances*.
- Review Screening Record Approval Date: indicates the PQI signature date of screening approval (documented in the project file on the Streamlined Project Review form of the 106 PA *Appendix C*).

Standard consultation project lists indicate:

- Project Finding
- Finding Letter Date

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Central	CR24 Bridge NNHS Preservation	CFHWY001145	Pending	New Project	1.b, 1.e, 1.o, 1.p, 1.q, 1.r, 2.c, 2.e, 2.f, 2.o	10/10/2023
Replace object markers and signs; cut brush and remove from previously cleared areas: rehab bridge decking including patching, new membrane, and resurfacing; cleaning deck, curb and bearings; debris removal at piers; clean and replace bridge joints; concrete spall repairs; paint over graffiti; rail, delamination, abutment and bridge approach repair/replacement; brush control; place new riprap and fill material; scupper and downspout extension to redirect runoff, erosion control around abutments and approach shoulders; repair impact damage, repair and replace bolts, girders wood decks, sub-decks and dry stack retaining walls and excavate and refill an erosion area.						
Central	Hemmer Road Extension and Upgrade, Palmer-Wasilla Highway to Bogard Road	CFHWY00885	Pending	Geotech	2.q	10/6/2023
Geotechnical drilling from the existing road prism to inform project design.						
Central	AMATS: L & I STREET, 3RD to 15TH, PAVEMENT PRESERVATION	CFHWY01059	Pending	New Project	1.a, 2.a, 2.c, 2.d, 2.g, 2.h, 2.i	10/17/2023
Includes: automated traffic recorders; dig-outs, drainage improvements (culverts, ditching, storm drain); guardrail improvements; improvements to roadside hardware; intersection improvements; lighting, signal, and signage improvements; pedestrian and ADA improvements/facilities; raised medians; resurfacing; safety improvements; striping; utility relocations; and vegetation grubbing and clearing.						
Central	CR24 Bridge NHS Preservation	CFHWY01144	Pending	New Project	1.e, 1.o, 1.p, 1.q, 1.r, 2.c, 2.e, 2.f, 2.o	10/10/2023
Replace object markers and signs; cut brush and remove from previously cleared areas: rehab bridge decking including patching, new membrane, and resurfacing; cleaning deck, curb and bearings; debris removal at piers; clean and replace bridge joints; concrete spall repairs; paint over graffiti; rail repair and/or replacement; brush control; replace eroded fill material in-kind; scupper and downspout extension to redirect runoff, erosion control around abutments and approach shoulders; repair impact damage, repair/replace bolts, girders, wood decks, sub-decks, dry stack retaining walls and excavate a fill area above and below structure to accommodate sloughing material.						
Central	ROW Disposal Application	216.531D; FHWA Non-Assignable	Pending; FHWA Non-Assignable	New Project	2.s	3/12/2024
Land disposal to neighboring lot near Wasilla, AK.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Central	AMATS: VFW Road - Eagle River Loop to Eagle River Road Pavement Preservation	CFHWY00732	0001695	Project Update	1.a, 1.d, 1.o, 1.q, 2.a, 2.c, 2.g, 2.h, 2.i, 2.o	05/30/2024

The purpose of the proposed project is to extend the service life of the facility, improve safety, and reduce future maintenance costs. The existing road shows signs of wear and degradation, such as frequent transverse cracking. The proposed work includes resurfacing, road structural section repairs, upgrading and installing roadside hardware as necessary, bridge improvements, drainage improvements, Americans with Disabilities (ADA) improvements as necessary, utilities as necessary, and vegetation clearing and grubbing. Update: The project activities remain the same; however, the APE has been expanded with bump-outs for two streambank revetment areas (Eagle River and Meadow Creek) as well as adequate room for construction staging and access.

Central	HSIP: Pittman Road Shoulder Widening and Slope Flattening, Zehnder Rd to Church Rd	CFHWY00926	0001752	New Project	1.a, 1.b, 1.e, 2.c, 2.g, 2.i	7/10/2024
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This HSIP project proposes to widen shoulders, flatten slopes, and install safety edges along Pittman Road. Additional activities would be included as needed to achieve safety goals. Additional activities may include:

- Drainage improvements
- Intersection improvements (improvements to existing facilities, no additional lanes or signals anticipated)
- Improvements to roadside hardware (guardrail, signs, lighting, etc.)
- Pavement resurfacing
- ROW acquisitions
- Striping
- Structural dig-outs
- Utility relocations
- Vegetation clearing and grubbing

Central	AMATS Minnesota Drive Sidewalk Repairs	CFHWY01105	Pending	Project Update	2.a, 2.c, 2.d, 2.g, 2.h, 2.i, 2.l	09/26/2024
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The project proposes upgrades to the sidewalks and pathways along Minnesota Drive, between Tudor Road and Hillcrest Drive in Anchorage.

The proposed improvements include: improving existing surfaces (e.g. subgrade rehabilitation, milling, paving); pedestrian improvements, including Americans with Disabilities compliance; replacing, repairing, or installing roadside hardware; drainage improvements (e.g. storm drain facilities, ditches, and/or upgrade or rehabilitation of culverts); intersection improvements (roadside hardware, lighting, signals, etc.); utility relocation and landscaping as necessary.

UPDATE: Intersection improvements may also include the construction of additional turn lanes and/or modification of signal phases. All work is in previously disturbed ground.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Northern	FFY 24/25 Bridge Scour Monitoring and Retrofit Program	HFHWY00393	Pending	New Project	1.c	12/6/2023
The Project activities are to protect Piers 2 & 3 of the Castner Creek Bridge (#0583) on the Richardson Highway from scour damage at the abutments. Repair will involve replacement of Class I and Class IV riprap to protect the piers and help restore the structural integrity of the bridge from further scour damage. The Castner Glacier Ice Cave Trail parking lot will be used for temporary staging of equipment and material during construction activities. Material will be brought in from Hogan Hill Quarry North (MS 71-3-009-5) at MP 158 on the Richardson Highway.						
Northern	Richardson Highway MP 65-80 Rehabilitation	NFHWY00149	0711076	Geotech	2.q	3/19/2024
This Project Update is to conduct material site geotechnical investigation of four (4) material sites in support of the project: MS 71-1-006-5 Burma Rd Quarry), MS 71-1-024-5 (Tonsina Lodge Pit), MS 850-036-5 (Kenny Lake School Pit), and MS 71-1-015-5 (Richardson Highway MP 67 Pit).						
Northern	Elliott Highway MP 18-29 Resurfacing	NFHWY00588	Pending	Project Update	2.d	10/20/2023
This Project Update is to address the moving of the locations of culverts being installed/replaced between approximately MP 24 and MP25 of the Elliott Highway.						
Northern	NOR REG Drainage Improvements	NFHWY00701	Pending	Project Update	2.i	1/5/2024
This Project Update is to add a temporary auxiliary diversion road to the Project activities description within the existing Project APE near MP107 (Stickwan Creek) of the Denali Highway. The temporary auxiliary diversion road will be removed at the completion of the Project.						
Northern	Richardson Highway Northbound Chena Flood Control Bridge #1364 Replacement	NFHWY00782	0A24035	Project Update	2.l	1/9/2024
This Project Update adds the utilities being placed on the new Southbound Bridge (#1866). The APE for the project remains the same and there will be no additional ground disturbance.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Northern	Fairbanks Bike Lanes Striping and Signing	NFHWHY00835	Pending	New Project	1.a, 1.f, 2.g	10/16/2023

The Project proposes to apply bike lane pavement markings on existing facility locations throughout Fairbanks, Alaska. Select locations within the following community would receive replacement of sidewalk panels and replacement/changes to ADA ramps. There will be installation of new signage associated with the bike lane.

Northern	Northern Region FFY24 NHS Interstate Highway Preventative Maintenance (PM)	NFHWHY00863	Pending	New Project	1.a, 1.b, 1.d, 1.e	11/22/2023
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This annual PM Project will include maintenance and rehabilitation of paved roadways; application of pavement stripes and markings; stabilization and repair of shoulders and ditches; and cleaning of culverts, inlets and storm drains. All work will be confined to the existing roadway embankment or structure and is intended to restore the system and its components to an as-built condition.

Northern	Northern Region FFY24 NHS Non- Interstate Highway &CTP Preventative Maintenance (PM)	NFHWHY00864	Pending	New Project	1.a, 1.b, 1.d, 1.e	11/22/2023
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This annual PM Project will include maintenance and rehabilitation of paved and gravel roadways; application of pavement stripes and markings and fog seal; stabilization and repair of shoulders and ditches; cleaning of culverts, inlets and storm drains; and repair and/or refurbishment of lighting systems. All work will be confined to the existing roadway embankment or structure, and is intended to restore the system and its components to an as-built condition.

Northern	Northern Region FFY24 NHS Interstate Bridge Repairs Preventative Maintenance	NFHWHY00865	Pending	New Project	1.l, 1.m, 1.n, 1.o, 1.p, 1.q, 1.r	10/24/2023
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This annual PM Project includes cleaning and washing bridges, replacing bridge rail systems, including posts, damaged bridge rail tube, base and anchors; tightening or replacing nuts on rails; repairing curb slider plates; patching deck and curb spalls and deck joint headers; replacing damaged three-beam rails; recasting the expansion joints at piers and installing M-seals; Resealing expansion and abutment joints; replacing bridge rail grout pads; repairing deck spalls; repairing bearing grout pads; replacing curb joints; tightening or replacing bolts; cleaning and painting bearings; cleaning the bridges and removing debris.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
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Northern	Northern Region FFY24 NHS Non- Interstate & CTP Bridge Preventative Maintenance (PM)	NFHWHY00866	Pending	New Project	1.l, 1.m, 1.n, 1.o, 1.p, 1.r, 2.o	11/1/2023
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This Annual PM Project includes cleaning and washing bridges, removing debris, replacing bridge rail systems, including posts, damaged bridge rail tube, base and anchors; tightening or replacing nuts on rails; installing 3/4" PPC overlay to the deck for preservation, installing bridge number plates, removing and replacing timber wearing surfaces, repairing damaged wing walls, repair deck spalls and spalls near bridge rail posts, repair damaged piers, recasting and resealing expansion joints, replacing damaged nosing abutments, and installing anchor bolts at pier rail posts.

Northern	Rex Bridge Repairs	NFHWHY00897	Pending	New Project	2.o	2/16/2024
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This Project will be making repairs to the Nenana River Bridge at Rex Crossing (#0216) near MP 276 of the Parks Highway to insure that the bridge maintains the adequate capacity to carry legal loads. The bridge repairs will include bolting steel plates or angles at Pier 2 to strengthen the floorbeam, add new bearing or a supplemental support to the approach span beams, and add crack-arrest holes. No in-water work will be required to construct repairs on the bridge. Temporary intermittent traffic closures may be required to make repairs.

Northern	Dalton Highway MP 109-144 Reconstruction	Z607380000	0653007	Geotech	2.q	2/6/2024
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This Project Update formally expands the size of the geotechnical testing APE at the Fish Creek Exploration Area.

Northern	Alaska Highway MP1235-1268	Z60752000	303232	Project Update	2.c, 2.i	1/23/2024
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This Update involves additions to the Project activities which include the installation of snowplow turnarounds at the passing lanes located near MP 1254.3 & MP 1260.3 within the current project APE. These locations will have the vegetation cleared and the ground leveled paved as part of the construction of the snowplow turnarounds.

Northern	Shishmaref Sanitation Road Erosion Control	NFHWHY00687	Pending	Project Update	2.b, 2.e	08/26/2024
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This UPDATE modifies the original project APE and adds armoring activities. Within the updated APE, slope stabilization is needed to protect the existing roadway from increasingly severe erosion due to annual fall storms. Project activities within the updated APE would be consistent with those described in previous project description . Slope stabilization would consist of 5 feet of armor stone, underlain with geotextile fabric, layered along the surface of the seaward embankment (north side) of the roadway. Armor stone is anticipated to be used as funding is available after previously approved activities are completed and the project engineer identifies specific areas in need of stabilization. All material would be placed within the existing road ROW and road easement. Materials are expected to be sourced from Cape Nome and transported to one of two previously established and regularly used barge landings, then hauled to the project area via established haul routes.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Northern	Dalton Highway MP 245-274 Resurfacing	NFHWY00764	Pending	New Project	1.a	05/30/2024
<p>The Project proposes to resurface the Dalton Highway between milepost (MP) 245-274. Removal and replacement of existing crushed surface course with new crushed surface course. All work will be contained to the existing roadway. No new ground disturbance will occur. No expansion of the roadbed will occur. All staging will occur within the disturbed travelway and material site boundary. Material site (MS) 65-9-008-2, (Atigun Pit #1) near MP 253 will provide material for the Project.</p>						
Northern	Richardson Highway MP 237-257 Rehabilitation	NFHWY00817	Pending	Geotech	2.c, 2.q	06/13/2024
<p>Geotechnical drilling will be accomplished with a truck-mounted drill rig within two material sites, MS 71-0-024-2 and MS 71-0-033-2. Vegetation clearing via mechanical means will occur in areas where previously disturbed areas of the material site have been revegetated. The drill rig is equipped with hollow-stem auger drill tooling and 3-inch split-spoon sampling equipment. The test holes will be advanced to target depths approximately 35-feet below the ground surface and split spoon samples will generally be collected at 5-foot intervals. Access to the drill locations will be limited to the currently existing entryways and disturbed portions of the material sites. No new ground disturbance is occurring.</p>						
Northern	HSIP: Northern Region Systemic Signal Upgrades	NFHWY00904	Pending	New Project	1.e, 2.g	07/24/2024
<p>The Project will upgrade traffic signals at seven intersections, two in Denali Park Village and five in the Fairbanks area. Intersection locations Denali Park Village are: Parks Highway & Canyon Drive and Parks Highway & Denali Drive. Intersection locations in the Fairbanks area are: Farmers Loop Road & Ballaine Road, Farmers Loop Road & North Tanana Drive, Peger Road & Johansen Expressway, College Road & Johansen Expressway, Geist Road & Loftus Road. Work includes removing replacing, moving existing traffic signal systems, including replacing flashing yellow arrow signals, replacing signal heads, replacing signal poles and mast arms, installing additional signal heads and replacing traffic signal controller and communication equipment. All work is occurring within previously disturbed ground.</p>						
Northern	Parks Highway Mile Post 315-325 Reconstruction	Z606570000	0A45028	Project Update	2.c	08/13/2024
<p>This Project Update adds Rex Pit (MS 37-2-069-2) to the Project APE. Access to the material site will be through existing driveway locations near MP 277 of the Parks Highway.</p>						
Northern	Parks Hwy 183-192 Reconstruction	Z633890000	0A43021	Project Update	2.c	05/10/2024
<p>This Project update is to add Panorama Mountain #2 (MS 52-2-068-2) to the project APE to provide additional aggregate for the Project. The material site is located near MP 217 of the Parks Highway.</p>						
Northern Region		Streamlined Reviews			Appendix 1-6	

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Southcoast	AMHS Auke Bay East Ferry Terminal Improvements--Stage 1	SAMHS00419	0933048	Project Update	2.l, 2.n	10/20/2023
<p>The project proposes to repair or replace the berthing dolphins at the Auke Bay Ferry Terminal in Juneau, AK. Proposed work includes:</p> <ul style="list-style-type: none"> • Lighting upgrades along dolphins, catwalks and gangways. • Removal and replacement of electrical components as needed to perform dolphin replacement work. • Installation of cathodic protection anodes on all piles. <p>This update covers the addition of a 6th berthing dolphin, replacement/installation of 5 new catwalks and upgrades to the shore power electrical system at the West Berth.</p>						
Southcoast	KTN Wolfe Point Slope Stability Improvements	SFHWHY00432	0920032	Project Update	2.b, 2.e	12/1/2023
<p>This update adds a traffic detour area and clarifies drilling depths to repair unstable slopes on N. Tongass Highway between MP 3.0 and MP 3.29 in 3 zones: Area 1) Maximum cut heights are 90' tall. Distance from roadway to back of cut face approx 100'. Blasting, ditching - clean rockfall debris, scaling, drill drain holes, drill dowels, install pinned mesh. Area 2) Drill rock dowels approx 15-20'. Area 3) Clear vegetation within 15' of slope crest and scale loose rock debris from slope. Drill rock dowels approx 15-20'. Other activities remain unchanged.</p>						
Southcoast	Yakutat Drainage Maintenance	SFHWHY00525	0003273	Project Update	1.d	10/20/2023
<p>This project proposes in-kind replacement of four failing culverts conveying streams across Dangerous River Road in Yakutat, Alaska. The culverts are located at milepoints 8.6, 19.7, 24, and 25.5 of Dangerous River Rd. This update provides the correct milepoint locations of the culverts as identified by ADF&G and adds a fourth culvert that has begun to fail. All work will take place within previously disturbed ground at the same sites as the existing culverts and within the operational right -of-way of Dangerous River Road.</p>						
Southcoast	SR Contractor Highway Striping	SFHWHY00556	Pending	New Project	1.a	2/6/2024
<p>The project involves reapplication of pavement markings.</p>						
Southcoast	SR State Forces Highway Striping	SFHWHY00557	Pending	New Project	1.a	2/6/2024
<p>The project involves reapplication of pavement markings.</p>						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Southcoast	KTN: Herring Cove Bridge Improvements - Traffic Barrier	SFHWHY00072_A	0902043	New Project	2.a, 2.g	05/06/2024

The project proposes to install a guardrail and protective barriers around utilities on the northwest side of the South Tongass Highway near Milepoint 10.4 before the Herring Cove Bridge in Ketchikan, AK, replacing the current flexible traffic barrier at this location. Construction would include temporary closure of one lane and single lane traffic control with the aid of flaggers and/or temporary signage.

Southcoast	KTN N Tongass Hwy Resurface: A/P Ferry Term Parking to West Ward Creek Bridge	SFHWHY00181	920031	Project Update	1.f, 2.g	5/2/2024
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Project updated to address replacement of all guardrail with new guardrail throughout entire project (previously had been replacement of worn guardrail), installation of new guardrail at select locations, and expanded footprints of ROW easements. All updated work was contained within the previous project APE except APE extended in select locations to show expanded ROW.

Southcoast	KTN Tongass Avenue Water Street Viaduct	SFHWHY00196	902045	Update	2.q	4/10/2024
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Updated geotech effort under and within the structure of Water St. Viaduct.

Southcoast	JNU - Bridget Cove Culvert Replacement	SFHWHY00359	0003267	Project Update	2.b, 2.d, 2.e, 2.f, 2.i	05/09/2024
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This update revises the project description with new information on the size of the replacement culvert, and adds new re-vegetation, erosion control, stream restoration and slope stabilization activities to the project. A temporary 16' wide x 550' long traffic diversion lane will be constructed on the eastern/upstream side of the road to keep one lane of traffic open throughout construction, and will be fully removed and the road restored to pre-existing conditions at the end of the project.

The APE was expanded to account for increases to the project footprint and to accommodate construction access to the project area.

Southcoast	JNU ROADWAYS AND CULVERTS - DEC 20 SE PR	SFHWHY00438	AK2021-1	New Project	1.a, 1.f, 2.b, 2.d, 2.e, 2.g	08/21/2024
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This project will design and construct permanent repairs (PR) to assets damaged by the December 2020 Storm in the Southcoast Region of Alaska. Repairs may include, but are not limited to, asphalt, embankment, geotextile, riprap, drainage, roadside hardware, retaining walls, and utilities. This project will repair sites on Glacier Highway/Lemon Road, Egan Drive/Glacier Highway, and Glacier Highway/Twin Lakes Drive.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Southcoast	JNU Glacier Highway Chip Seal - Industrial Blvd. to Ferry Terminal	SFHWHY00481	0933051	Project Update	2.a	09/04/2024
This update is being made to change the termini of the project from "Brotherhood Bridge to the Auke Bay Roundabout" to "Fritz Cove Road to Auke Bay Ferry Terminal."						
Southcoast	JNU Glacier Highway Chip Seal - Industrial Blvd. to Ferry Terminal	SFHWHY00481	0933051	Project Update	2.a	09/12/2024
This update is being made to change the termini of the project from "Fritz Cove Road to Auke Bay Ferry Terminal" to "Industrial Blvd to Ferry Terminal."						
Southcoast	FFY24 Shoulder Slope & Ditch	SFHWHY00510	0003273	New Project	1.b, 1.d	4/2/2024
The project includes shoulder treatment and slope conditioning as well as ditch reconditioning.						
Southcoast	SR FFY24 Catch Basin & Culvert Maintenance	SFHWHY00565	0003273	New Project	1.d	06/17/2024
This project proposes to conduct maintenance of catch basins and culverts along roadways in the communities of Gustavus, Haines, Juneau, Ketchikan, Klawock, Kodiak, Petersburg, Sitka, and Wrangell. Maintenance includes utilizing a vacuum/jet truck to clean culverts and catch basins. Work is limited to conveyance culverts; no work will take place within fish bearing streams. No new ground disturbance will take place.						
Southcoast	SR FFY24 Dust Management	SFHWHY00566	0003273	New Project	1.a	07/25/2024
This project proposes to apply calcium chloride dust palliative to select roadways in the communities of Cold Bay, Kodiak, and Yakutat in the Southcoast Region.						
Southcoast	Cordova Ferry Terminal Modifications – Dolphin E2 Repair	SFHWHY00614	9500155	New Project	1.k	09/24/2024
Project proposes to remove the upper 20 feet of a bent pile. The Contractor will attach a strap or a cable to the top of the pile. Once the pile has been torch-cut, the Contractor will lift the pile with the strap and place it on the shore (no vibratory hammer or in-water work required, therefore, there will be no noise associated with the removal.)						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Southcoast	Ketchikan Ferry Terminal Improvements Stage II	Z674660000	000S855	Project Update	2.n	07/25/2024
<p>This is a project update. The new items include:</p> <p>Berths 1 and 2:</p> <ul style="list-style-type: none"> • Demolition of the abandoned water line; and • Fiberglass enclosure to house electrical and communications equipment on the west float. <p>Berth 3</p> <ul style="list-style-type: none"> • Additional electrical improvements and purser/electrical shelter replacement. 						
Southcoast	KTN Tongass Ave Improvements	Z680910000	0902042	Project Update	2.g	06/11/2024
<p>This project update includes changing the materials used to construct the bus pullouts from asphalt to six inches of concrete and lowering the retaining wall beneath 21 driveways, ramps and curbs along Tongass Avenue. In order for the new sidewalk to meet Americans with Disabilities (ADA) cross slope requirements, the retaining wall beneath the driveways, ramps and curbs will need to be lowered. All updated activities are within the project's original Area of Potential Effect (APE).</p>						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Applicable Tier 1 and Tier 2 Activities	Review Screening Record Approval Date
Statewide	NEVI Trapper Creek Three Bears	NFWY00877	Pending	New Project	2.c, 2.g, 2.k, 2.l	3/15/2024
The proposed project will design and construct an electric vehicle charging station (DC Fast Charge) at MP 114.6 of the Parks Hwy in Trapper Creek, AK at the Three Bears Alaska store. The project will include: construction of 8 electric vehicle charging stalls designed to meet ADA requirements; grading work; surfacing areas with geogrid and gravel and parking markers; installation of Tesla charging equipment to include posts, cabinets, master controller, and ancillary equipment; installation of bollards; lighting; signage; vegetation clearing; installation of utility infrastructure including utility poles, power lines, trenching, conduit, transformers, meters, switchboards, pads/foundations, cellular connectivity equipment.						
Statewide	NEVI Denali State Park McKinley Princess Wilderness Lodge	HFHWY00387	Pending	New Project	2.c, 2.g, 2.k, 2.l	6/10/2024
The proposed project will design and construct an electric vehicle charging station at milepost (MP) 133 of the Parks Highway near Trapper Creek, Alaska. The host location for the charging site is a parking lot at the McKinley Princess Wilderness Lodge which is located one and a half miles from the Parks Highway. The proposed project would include the following: Construction/installation of four electric vehicle charging stalls that will be designed to meet ADA requirements; Grading and compacting work to prepare the site for installation and surfacing the parking areas with asphalt and striping; Installation of Jule charging equipment, to include charging stations, energy storage system, and all associated ancillary equipment and hardware; Installation of bollards and curbs as needed to protect all charging equipment; Lighting; Signage; Vegetation clearing and reestablishment as needed; Installation of utility infrastructure - utility poles, power lines (above and below ground), trenching, conduit, transformers, junction boxes, meters, switchboards, pads/foundations.						
Statewide	NEVI Healy McKinley Chalet Resort	HFHWY00388	Pending	New Project	2.c, 2.g, 2.k, 2.l	6/7/2024
The proposed project will design and construct an electric vehicle charging station at milepost (MP) 238.9 of the Parks Highway near Healy, Alaska. The host location for the charging site is the McKinley Chalet Resort which is located directly adjacent to the Parks Highway. The proposed project would include the following: Construction/installation of four electric vehicle charging stalls that will be designed to meet ADA requirements; Grading and compacting work to prepare the site for installation and surfacing the parking areas with asphalt and striping; Installation of Jule charging equipment, to include charging stations, energy storage system, and all associated ancillary equipment and hardware; Installation of bollards and curbs as needed to protect all charging equipment; Lighting; Signage; Vegetation clearing and re- establishment as needed; Installation of utility infrastructure - utility poles, power lines (above and below ground), trenching, conduit, transformers, junction boxes, meters, switchboards, pads/foundations.						
Statewide	NEVI Nenana 721 Main Street	NFWY00879	Pending	New Project	2.c, 2.g, 2.k, 2.l	4/5/2024
The proposed project will design and construct an electric vehicle charging station (DC Fast Charge) at MP 304 of the Parks Hwy in Nenana, Alaska at the Main Street Parking Lot. The project will include: construction of 8 electric vehicle charging stalls designed to meet ADA requirements; grading work; surfacing areas with geogrid and gravel and parking markers; installation of Tesla charging equipment to include posts, cabinets, master controller, and ancillary equipment; installation of bollards; lighting; signage; vegetation clearing; installation of utility infrastructure including utility poles, power lines, trenching, conduit, transformers, meters, switchboards, pads/foundations, cellular connectivity equipment.						

Standard Consultation Lists

This section of Appendix 1 contains each region's list of standard consultations processed during the FFY24 reporting year.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Central	Glenn Highway MP 66.5-92 Pavement Preservation	CFHWY00394	0A15039	Project Update	No Historic Properties Adversely Affected	4/17/2024
The project includes rock scaling, placement of rip rap, and erosion repair.						
Central	HSIP Vine Road at Hollywood Intersection Improvements	CFHWY00463	30463	New Project	No Historic Properties Affected	3/7/2024
The project includes installation of a single lane roundabout or traffic signal; signage and striping; drainage improvmeents; lighting improvements; utility relocation; and vegetation clearing and grubbing.						
Central	AMATS: Downtown Trail Connection	CFHWY00586	Pending	Project update	No Historic Properties Affected	7/29/2024
The project will rehabilitate or construct a new multiuser trail from North C Street along Ship Creek to the boat launch, then continuing along the rail line to Elderberry Park.						
Central	AMATS Fish Creek Trail Connection	CFHWY00587	Pending	New project	No Historic Properties Affected	7/8/2024
This project will construct new trail connecting Northern Lights Blvd to the Tony Knowles Coastal Trail along the north bank of Fish Creek.						
Central	Parks Highway MP 99-163 Drainage and Culvert Improvements	CFHWY00592	0A41042	Project Update	No Historic Properties Affected	6/24/2024
This update adds culvert replacements, including temporary detours, and installation of fish passage culverts.						
Central	AMATS: Academy Drive/Vanguard Drive Area Improvements	CFHWY00783	Pending	New Project	No Historic Properties Affected	10/5/2023
The project will realign/reconfigure approximately 1000-1500 feet of Academy and Vanguard Drives between Brayton Drive and Abbot Road. Activities will resurface and reconstruct the road surface; improve drainage; improve pedestrian facilities; acquire necessary ROW; make facilities in accordance with the Americans with Disabilities Act; improve signs, lighting, and roadside hardware; relocate utilities as needed; and clear and grub vegetation.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Central	Hemmer Road Extension and Upgrade, Palmer-Wasilla Highway to Bogard Road	CFHWY00885	Pending	New Project	No Historic Properties Affected	11/29/2023
The project includes paving and will also: install pathway and/or sidewalk; install or replace roadside hardware; realign roadway to connect upper and lower Hemmer Drives; create shoulders; apply signs and striping on the road surface; install and/or upgrade signals; add pedestrian amenities; clear and grub brush; and install drainage features.						
Central	Glenn Highway at Hiland Road Interchange Improvements	CFHWY00917	Pending	New Project	No Historic Properties Affected	3/11/2024
The project will: resurface, regrade and/or reconfigure bridge lane and access ramps; improve or relocate non-motorized facilities, construct new retaining walls and pedestrian undercrossing tunnels; make drainage improvements and ADA improvements; upgrade, replace or install new roadside hardware; install new or replace roadside hardware; install new or relocate existing lighting; clear vegetation; and relocate utilities.						
Central	Sterling Highway MP 45-60	Z50314000	STP-F-021	Project update	Adverse Effect/MOA	8/12/2024
The project involves realignment of the Sterling Highway between MP 45-60. This update provides DOEs for properties within the APE.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Northern	Northern Region ADA Improvements--Nome Steadman Street	NFHWY00550	Pending	Project Update	No Historic Properties Adversely Affected	4/30/2024
This update letter adds ROW Acquisition along much of the western portion of Steadman Street. Changes in project description also include increasing the maximum excavation depth of Steadman Street subbase from 48" to 60" and increasing the proposed excavation depth of water and sewer connection lines to a maximum depth of 14.5' to obtain a firm surface in which to properly "bed" the lines. This update also details reduction in the number of water and sewer line connection locations--the Front Street, 1st Avenue, 3rd Avenue, 4th Avenue, Alley, and 5th Avenue lines have been removed from the project.						
Northern	Glenn Highway MP 158-172 Rehabilitation	NFHWY00572	Pending	New Project	No Historic Properties Affected	3/14/2024
The project will rehabilitate a portion of the Glenn Highway from MP 158 through MP 172. Project activities include replacement of the pavement from MP 158 through MP 172. Some select low lying areas will receive embankment excavation and reconstruction. Additional work includes replacement of culverts, drainage improvements, vegetation clearing, replacement of signs and guardrails, and potential utility relocations.						
Northern	Cordova Second Street Reconstruction	NFHWY00595	Pending	Project update	No Historic Properties Adversely Affected	5/10/2024
The updated project activities consist of: Installing approximately 2,300 linear feet of new sidewalk on both sides of Second Street. The sidewalks will be 6-feet wide with standard curb and gutter to match the ADA-compliant previously described sidewalk replacements. The update also addresses expansion of the APE through ROW acquisition to complete logical termini for the new sidewalks at the crossroads intersection with 2nd Avenue and ROW acquisitions to facilitate installation of new sidewalks' logical termini on W. Davis Ave and Lake Ave. The update also describes expansion of the APE on crossroads to replace newly identified damaged pavement.						
Northern	Richardson Highway MP 214-218 Reconstruction	NFHWY00655	724028	New project	No Historic Properties Affected	4/25/2024
The project will reconstruct the Richardson Hwy between MP 214-218; realign the road at the bridges; replace three bridges (Upper Miller Creek, Lower Miller Bridge, and Castner Bridge); improve drainage; and construct a parking lot for the Castner Creek Trail. The project will widen the shoulders throughout the corridor and includes replacing existing culverts, underground utility relocation within ROW, replacing roadside hardware, and vegetation clearing.						
Northern	Chena Small Tracts Roundabout	NFHWY00699	Pending	Project Update	No Historic Properties Affected	8/11/2024
This update letter addresses questions raised by SHPO in their July 25, 2024 letter of non-concurrence, regarding the DOE for Chena Pump Road and supplies additional information.						
Northern	Chena Small Tracts Roundabout	NFHWY00699	Pending	Project Update	No Historic Properties Affected	8/11/2024
The project proposes to construct a roundabout at the intersection of Chena Pump Road, Old Chena Ridge Road, and the Chena Small Tracts Road. Work will entail reconstructing the intersection, resurfacing, signage, possibly realigning pedestrian facilities, vegetation clearing, utility relocates, and lighting. Right-of-way (ROW) acquisition is not expected, although some temporary construction easements may be needed.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Northern	Alaska Highway Johnson River Bridge Replacement	NFHWY00743	0A22(008)	Project update	Adverse Effect/MOA	11/1/2023
This second updated findings letter re-examines the eligibility determination of XMH-01621 (The Johnson River Bridge Construction Historic District) to assess whether it may also be eligible under Criterion B; and re-examines whether XMH-01305 (the AMHT&TL) is a contributing element to XMH-01621. Additionally, this letter clarifies the location and the nature of the project's temporary construction easements (TCEs), which were originally presented in the project description of the June 15th, 2023 findings letter.						
Northern	Murphy Dome Road MP	NFHWY00818	0002(532)	Project update	No Historic Properties Affected	8/12/2024
This update letter provides additional information per SHPO request on the DOE for Murphy Dome Road MP 0-8 (FAI-02829) and addresses SHPO's request to evaluate the entire length of Murphy Dome Road. The letter provides supplemental historic background information supporting the Not Eligible Determination for Murphy Dome Road MP 0-8 (FAI-02829) and an explanation of why only the first 8-miles of the road is being evaluated.						
Northern	Murphy Dome Road MP 0-2 Rehabilitation	NFHWY00818	0002(532)	Project update	No Historic Properties Affected	8/12/2024
The project will rehabilitate a portion of Murphy Dome Road from MP 0 (between the Sheep Creek Road/Goldstream Road intersection) through MP 2 (the Spinach Creek Road intersection). Project activities include: widening the shoulder 6-feet, flattening vertical curves to increase sight distance, embankment stabilization, excavation and reconstruction, culvert repair/replacements, drainage improvements, vegetation clearing, replacement of signs and guardrails, replace existing bridge guardrails & transition rails, along with potential utility relocations and potential ROW acquisition.						

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Southcoast	Ketchikan Stedman & Deermount Street Intersection Safety Improvements	SFHWHY00186	0003244	New Project	No Historic Properties Adversely Affected	2/15/2024
The project proposes to: Provide additional illumination at the Stedman/Deermount intersection in order to achieve a level of luminance that meets current DOT&PF standards; Construct drainage improvements to accommodate the bulb-out pedestrian sidewalk.						
Southcoast	SKG Klondike Hwy Rehab: SGY River Bridge to Canadian Border	SFHWHY00225	0972019	Geotech	No Historic Properties Affected	8/5/2024
The proposed work consists of geotechnical investigation in the roadbed to characterize the subsurface soil, rock, and groundwater conditions at each location from MP 2-15 of the Klondike Highway. The geotechnical investigation will include a total of 118 borings (823 LF) performed to depths ranging from 4 feet to 50 feet, with a maximum potential depth of 70 feet. All tests are within DOT&PF ROW.						
Southcoast	Cold Bay Trout Creek Culvert Replacement	SFHWHY00326	0003265	New Project	No Historic Properties Affected	10/4/2023
The project involves: Excavating two new stream channels; excavating roadway and removing existing culverts; placing riprap at aprons and embankment for stabilization; backfilling prior stream channels; revegetating along disturbed areas; reconstructing roadway section over culvert to the same as exiting conditions; use of nearby material site for disposal of material.						
Southcoast	SKG-HNH-PSG Roadways & Culverts -- DEC 20 SE PR Geotechnical Investigation	SFHWHY00447	Pending	Geotech	No Historic Properties Affected	3/18/2024
The project consists of geotechnical investigation, including the drilling of four borings within the roadbed of the Klondike Highway near Milepoint 5.8.						
Southcoast	Inter Island Ferry Authority-Prince of Wales Passenger Accomodation Upgrades and Overhaul	SFHWHY00544	Pending	New Project	No Historic Properties Affected	1/24/2024
The project will refurbish the ferry vessel MV Prince of Wales. Refurbishments include multiple upgrades, replacements/installations, modifications and improvements to ship interior and exterior.						
Southcoast Region		Standard Consultations			Appendix 1-17	

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Southcoast	HNS HWY Reconstruction Milepost 3.9-25.0	Z686060000	0958028	Project Update	Adverse Effect/MOA	4/16/2024

The update letter notes that the project will:

- Straighten selected curves and add additional passing zones.
- Widen the roadway shoulders from 2 feet to 6 feet.
- Repave and restripe the roadway and add new signage.
- Reconstruct driveways.
- Realign the Chilkat Avenue and Haines Highway intersection.
- Construct a pullout and an interpretive wayside at the former site of the Chilkat River Bridge.
- Design updates between MP 14 and 25.

Region Name	Project Name	Project Number	Federal Project Number	Process Type	Project Finding	Finding Letter Date
Statewide	NEVI Cantwell Jack River Inn	NFHWY00878	Pending	New Project	No Historic Properties Affected	3/27/2024
<p>The project includes:</p> <ul style="list-style-type: none"> • Construction of eight electric vehicle charging stalls. The charging station will include design elements to meet ADA requirements. • Grading work will be required to prepare the site for installation and the parking areas will be surfaced with asphalt and striping. • Installation of Tesla charging equipment, to include charging posts, cabinets, master controller, and all associated ancillary equipment and hardware. • Bollards and curbs will be installed as needed to protect all charging equipment. • Installation of utility infrastructure: utility poles, power lines (above and below ground), trenching, conduit, transformers, junction boxes, meters, switchboards, pads/foundations, cellular connectivity equipment. • Lighting. • Signage. • Vegetation clearing and re-establishment as necessary. 						

Appendix 2: Program Monitoring -- Project Review

May 13, 2025

1.0 Introduction

The 106 PA requires annual program monitoring under *Stipulation IX.D.2.b*. As part of that monitoring, DOT&PF elected to perform a detailed review on a random selection of projects, distributed evenly across regions. This appendix provides the results.

This project review was conducted to supplement other monitoring measures that were in place. These included review of Programmatic Allowance documentation during preparation of semiannual reports; and ongoing informal communication and coordination among the SEO, region PQIs, and the OHA Cultural Resources Liaison.

The period covered by this review is October 1, 2023, through the end of the federal fiscal year on September 30, 2024.

2.0 Goals and Methods

The goal of the project review was to assess conformance with procedures and adequacy of documentation, building on the results from past years' review. Past assessments have randomly selected projects for in-depth reviews, balancing a sample size that could illuminate areas for improvement with a manageable number of reviews. This balance has typically been achieved in the range of 10-20% of the year's total Section 106 actions.

Using information from the Section 106 database, the SEO compiled lists of the completed streamlined reviews and standard consultations for each region, and applied a random number generator to the lists to select project actions for review. As in previous reviews, the SEO prepared checklists to assist reviewers in observing a shared set of baseline procedural and documentation topics. For FFY24, reviewers used essentially the same checklists employed during previous years, with a focus on general assessments of file completeness and conformity to the PA. This year checklists were converted to Survey Monkey forms to allow for easier data compilation and analysis.

Thirty-eight projects were selected for monitoring review. The number chosen for review reflects approximately 50% coverage of the total Section 106 findings and streamlined reviews processed during the reporting period. The review set consisted of 25 streamlined review projects: eight from Central Region (CR); eight from Northern Region (NR); eight from Southcoast Region (SR); and one from Statewide. The review set included 13 standard consultations: four from CR; four from NR; four from SR; and one from Statewide. Streamlined projects were processed per *Stipulation V* of the 106 PA; standard consultation projects were processed per Appendix D of the 106 PA.

Each regional PQI uploaded digital files for the selected projects into a shared drive. The SEO FHWA Cultural Resources Manager (CRM) and NEPA Program Manager/PQI reviewed all of the selected projects between them.¹ Region PQIs were also invited to conduct reviews of other

¹ The selection pool was based on a list of completed Section 106 actions, rather than on projects per se. Some projects have more than one completed Section 106 action during the review year. The random selection process is structured to identify specific actions for review. This selection technique can occasionally result in the selection of projects which have more than one Section 106 action during the reporting year. In past years, when a selected project had multiple completed actions during the reporting year, the SEO PQIs also looked at these associated actions during the review. Due to time constraints this year, SEO did not conduct these additional reviews.

regions' projects, for additional perspective and peer information sharing; however, no region PQIs were able to participate in the review due to time constraints. SEO compiled the review results. SEO discussed project-specific observations with region PQIs individually and will hold a teleconference with region PQIs to discuss broad topics from the review.

While the checklists provide a means to examine project Section 106 files to illuminate areas where procedural or documentation issues may be emerging, they can also pick up small-scale, project-specific imprecisions. It is not the goal of the project review report to focus on these items. SEO discussed such projects with PQIs individually during this review and requested annotations to the project files where clarification was needed. The purpose of this report is to present an assessment of how well the procedural and documentation requirements in the PA are being implemented. These requirements include ensuring that:

1. Streamlined Review projects qualify under the specifications outlined in the 106 PA Appendix B, and that their documentation supports this.
2. Standard Consultation projects have followed the process outlined in the 106 PA Appendix D and do not have substantive issues with: consultation protocols; conformance with 36 CFR 800.4-800.7; adequate support for 4(f) processing when needed; or general documentation.

The review also seeks to identify best practice areas, as well as emerging questions and areas for improvement in execution or procedural adaptation.

Because project updates can raise different review and processing issues, a separate results section (5.0 Results: Project Updates) is included to provide additional discussion of those projects.

3.0 Results: Streamlined Review Projects

Of the twenty-five streamlined projects selected for review, seven were Tier 1 and the remainder were Tier 2. Nine of the streamlined reviews were project updates. Updates are discussed further in Section 5.0.

Tier 1 projects are defined as those consisting solely of Tier 1 activities. Tier 2 projects are those which consist of Tier 2 activities, or a combination of Tier 1 and Tier 2 activities. For Tier 1 projects, the primary compliance subject is whether they were correctly classified for Tier 1 review, since Tier 1 does not require establishment of an APE or consideration of the general conditions that would apply for Tier 2.

Tier 2 allows projects with a wider variety of activities to be processed as streamlined reviews. For Tier 2 projects, APEs must be defined and documented, and the project must meet general conditions (GC) to qualify. The primary compliance review focus for Tier 2 projects is whether they indeed qualify for streamlined review or instead require standard consultation. Documentation of project APEs and fulfillment of general and allowance-specific conditions provide some of the necessary file support for Tier 2 qualification.

Tier 2 projects can also include Tier 1 components. When a Tier 2 project has a combination of components, any activities which include the possibility of improvements or upgrades should use the Tier 2 version of the allowances, rather than the parallel Tier 1 allowance. This helps to ensure that an appropriate APE is developed.

With all streamlined reviews, it is important for PQIs to continue to communicate to project teams that subsequent project updates require additional 106 review, and depending on the extent or location of the updated work, may result in the project no longer qualifying for streamlined review. In these instances, it is in the best interest of the project team to identify this early so that the PQI can begin the initiation and findings letter process.

3.1 General File Completeness

The review protocol relied on digital files for assessment, as uploaded by PQIs to a shared drive. Regions vary in their overall filing protocols, but all of the reviewed projects had signed streamlined review forms with complete attachments.

3.2 Tier 1 Projects: Documentation Supports Tier 1 Classification²

The proportion of streamlined reviews that consist solely of Tier 1 projects has remained consistently modest, at about 20-30% or less of annual totals. Seven of the reviewed projects this year were Tier 1, and no substantive issues were observed. Recent program reviews have not indicated concerns with Tier 1 projects, and SEO has retained the general recommendations for Tier 1 projects. One region in particular has developed a strong and consistent documentation of Tier 1 activity-specific conditions that can be a model for others, and as such is used by SEO as examples for new PQIs.

Recommendation: Previous program monitoring reports included recommendations that PQIs should continue to work with project teams to clarify proposed activities to the extent possible; to note Tier 1 allowance-specific conditions, as applicable; to prepare a Tier 2 review in cases where the possibility of new components is likely; and to communicate that subsequent updates to project activities require additional 106 review. DOT&PF will continue to implement these recommendations.

3.3 Adequate APE Description/Documentation for Tier 2 Projects

The goal of documentation is to enable any reviewers to understand the basis for the decision. Documentation of the APE can be a combination of narrative description, figures, and work location charts; the combination must enable a reviewer to understand the APE location. If detailed figures are not available, the APE description or other attachments need to fill the gap. Reviewers noted that these APEs were generally clear and understandable either by graphic, narrative, or a combination of the two. SEO reviewed eighteen Tier 2 forms. All of these projects had good descriptions and/or figures or other documentation detailing the APE.

Recommendation: APE definition continues to be an important area for streamlined review compliance. It can be the key to whether a project qualifies for Tier 2 or should proceed to standard consultation, particularly when adjacent properties may need consideration. PQIs should continue to carefully define APEs and assess whether projects qualify for Tier 2. Documentation of the APE must enable a reviewer to understand its location and extent, either through narrative description, figures, or both.

² Tier 1 projects consist of activities that have minimal potential to affect historic properties if the prescribed conditions are followed. Some other states' 106 PAs label these kinds of activities "exempt." The concept is similar for Tier 1 allowances, in that these activities are so modest that projects that qualify for this Tier would have a low documentation burden. When the project is limited to Tier 1 activities, establishment of an APE or an AHRs search are not required, since the key element for qualification is the type of activity, rather than where it occurs (subject to the appropriate conditions).

Previous program monitoring reports included a recommendation that PQIs should continue to coordinate with project teams to confirm whether project activities include improvements or upgrades so that Tier classification is accurate, and so that projects which fall into Tier 2 have appropriate activities considered when the APE is delineated. DOT&PF will continue to implement this recommendation.

3.4 Adequate Documentation that General Conditions Were Considered for Tier 2 Projects

All three regions have been including explicit confirmation that each of the general conditions (GCs) is met. These statements are provided directly on the screening record form, or in attached memos.

In one case, a streamlined review for a Tier 2 project was completed by a PQI in History. In this case the PQI consulted with, and documented that consultation, with an archaeologist to confirm that ground disturbance would occur in an area with low potential for archaeological resources.

Recommendations: When converting the streamlined review form for use within the BPM, SEO took past report recommendations regarding General Conditions into consideration. Best practices have noted that explicitly acknowledging the General Conditions make for a stronger and more easily understandable form. Generating a streamlined review form in the BPM requires users to acknowledge each General Condition (which is explicitly stated within the program) and provide explanatory text as needed in order to finalize the form. This ensures that the General Conditions are at hand during form preparation.

3.5 Streamlined Reviews Addressed Historic Roads Consideration When Applicable

Under the 2019 Appendix B revision, Tier 2 allowances may be used regardless of the National Register of Historic Places (NRHP) eligibility status of roads in the APE, with a few exceptions relating to specific allowances (2.g, 2.i, and 2.r). When a project proposes to use those allowances, and introduces new elements such as new roadway components, new bike/pedestrian facilities, new turning or auxiliary lanes, new roundabouts, etc., the project may still qualify for streamlined review after additional consideration; this consideration is referred to as Historic Roads Analysis (HRA). For example, using HRA, the PQI may determine that the project's new roadway elements are similar in scale and character to existing features, and the project can proceed as a streamlined review. The PQI may also use the HRA option of informal consultation with SHPO on the project's limited effects to the road, document their agreement, and proceed with streamlined review.

No issues were observed in the projects in the review set and examples of clear and succinct discussions of HRA application were found. Overall, the HRA process is working as intended to preserve simplicity of streamlined reviews while allowing PQIs to identify situations where projects should be handled as standard consultations. PQIs are working collaboratively with analysts and project teams to get the most detailed description of the work so they can ascertain whether HRA is needed and whether it applies.

Recommendation: PQIs should continue to work closely with analysts to get up-to-date project information to determine whether HRA is necessary. PQIs will continue to work with SEO and SHPO when questions arise regarding historic roads and the use of streamlined

review. SEO will continue to include a reminder in refresher training regarding allowances which do not trigger HRA.

Form Migration to BPM System: When converting the streamlined review form for use within the BPM, SEO considered past report recommendations regarding Historic Roads Analysis requirements and documentation.

3.6 Form Templates

The beginning of the reporting period maintained the status of two streamlined review template forms—one for New Projects and one for Project Updates. Previous reports have detailed how SEO reviewed projects that had inadvertently used the wrong form. This was a minor issue as the two forms are identical save from the specification of update or not. The new BPM module for Section 106 addresses this inadvertent confusion by having a single point of creation for a form, whether it is for a new project or a project update.

3.7 Geotechnical Consultations

Geotech investigations are part of background work during project development, with timing that varies considerably. They may be necessary on projects that qualify for streamlined review as well as projects that proceed through standard consultation. The investigations typically take place prior to the project's Section 106 finding of effect. They would generally, but not always, follow an initiation of Section 106 consultation on the larger project. For example, a small geotech investigation could be warranted in a roadbed for a streamlined review project, which does not otherwise require consultation, or for a project which is following the Direct to Findings protocol.

Three Geotech projects were included in the streamlined review sample. The reviews showed that PQIs are regularly considering and documenting access to drilling locations, a tier-specific condition, when applying the programmatic allowance. One project in the review set also highlighted the allowance-specific condition for 2.q, wherein a PQI may consult informally with the SHPO to clarify and resolve situations where geotechnical activities have low or no potential to adversely affect historic properties; the form included documentation of this informal consultation between the region and SHPO.

Geotech projects accounted for 9% of the total projects processed during FFY24. The streamlined review process continued to be an important tool, as of the seven standalone geotech investigations processed, five qualified for streamlined review. Geotech projects accounted for 10% of all projects processed with programmatic allowances.

Recommendation: SEO will continue to track the use of streamlined reviews for geotech investigations. SEO will provide recommendations to follow best practice when completing the streamlined review form and make it clear that the form is just for Geotech, and not for the entire project, when writing description of activities, and including maps.

4.0 Results: Standard Consultation Projects

Projects which are not eligible for streamlined review are processed through standard Section 106 consultation, as described in the 106 PA Appendix D. Since these projects have gone

through external consultation to resolve historic property concerns, this annual review focused on general documentation and on topics which were raised in prior years' reviews.

Thirteen sets of consultation letters were reviewed. Ten of these had No Historic Properties Affected findings and two had a No Adverse Effect finding. One project was an update to a project with a previous finding of Adverse Effect. Six of the reviewed sets were updates.

4.1 Letters Follow Currently Approved Templates³

General

SEO last updated consultation letter templates in August 2020 (with a minor update in spring 2023 to reflect the NEPA Assignment MOU renewal date).

As observed with last year's review set, in one instance a letter had a minor proofreading error in the finding of effect section. Although it was clear from the context and other parts of the letter what was intended, the typographical error contained the incorrect citation to the finding of effect as described in 36 CFR 800, as provided in the templates.

Recommendation: SEO will be reminding the PQIs to proofread for template language.

Clear delineation of Area of Potential Effects (APE)

No substantive issues were observed. Reviewers made some suggestions for best practices on occasional label clarity and figure preferences.

Recommendation: PQIs should continue to ensure that APE figures use Section 106 terminology and are consistent with the APE delineation in the letter.

Tribal consulting parties and initiation language

DOT&PF recognizes that Section 106 consultation with tribes extends beyond formal consultation letters. In past years, PQIs in all regions have worked to develop personal contacts with tribes and tribal staff, and facilitate informal consultation on projects.

With regard to consultation letters, templates for initiating consultation with tribes includes language requesting consultation on places of traditional religious and cultural importance.

The review checklist also inquired about inclusion of ANCSA corporations in project consultations. Both regional and village corporations are regularly consulted on projects. This is a complex area as differences exist among the ANCSA regions and entities. For example, the Doyon, Limited regional corporation regularly responds with acknowledgement of contact, but generally indicates no further interest in projects that occur off their corporation lands, while other regional corporations and/or their heritage subsidiaries express interest in all projects within their shareholders' traditional areas. PQIs have been building institutional knowledge for their respective regions, based on previous consultations and preferences expressed by these entities.

³ A note on templates: 106 PA *Appendix D* requires DOT&PF PQIs to use currently approved Section 106 letter templates for initiation of consultation and findings. Current templates are posted on the DOT&PF SEO Historic Properties webpage at <http://www.dot.state.ak.us/stwddes/desenvirom/resources/historicproperties.shtml>. These tools were developed to ensure that pertinent up-to-date regulatory information, consultation topics, and supporting material are included in formal Section 106 communications with various types of consulting parties. Tribal templates also include specific language for federally recognized tribes.

Recommendation:

SEO continues to emphasize use of the relevant language. This topic is also included in the Cultural Resources chapter of the NEPA Assignment Program Environmental Procedures Manual. The SEO will continue to address this topic in the annual 106 PA refresher training, and at upcoming CRT meetings. SEO will email all PQIs to remind them that templates created for regulatory parties (federally-recognized tribes, ANCSA Corporations, etc.) have specific language required by 36 CFR 800 for each group, and emphasize the importance of using the correct templates.

Government-to-Government tribal consultation language

both initiation and findings letter templates for federally recognized tribes include a notification that tribes may conduct consultation on a G2G basis with the FHWA. This year's review noted a project that had inadvertently not included the consultation options form with the initiation letter template for the federally-recognized tribe in the area. However, the findings letter for these projects did contain closing language noting that should the tribe prefer to conduct G2G with FHWA that was an option, and to contact the PQI if that was the case. Additionally, DOT&PF received a grant from FHWA during the early part of FFY25 to develop tribal consultation protocols and guidance; DOT&PF plans to re-examine the consultation options form to see how it could be better tailored to more clearly explain tribal consultation options with DOT&PF and/or FHWA.

Recommendations: SEO will remind PQIs to include consultation options forms with initiation letters for FRTs. SEO will work with PQIs on adjustments to the consultation options form to make it more user friendly for tribes who receive it. SEO will continue to emphasize the importance of including government-to-government language during training sessions and PQIs and project teams should continue to coordinate closely to ensure that federally recognized tribes receive letters with the G2G language at all points in the consultation.

Inclusion of other regulatory-required parties

For one project, reviewers noted that the local government had not been included. This same project sent an update letter a few months later, during the same reporting period, and rectified this issue, including the City government. No other issues were observed regarding this topic in this year's review.

Recommendation: PQIs should continue to ensure that Section 106 letters are provided to all pertinent consulting parties.

Inclusion of other parties

During each year of program review, SEO has observed PQIs taking steps to ensure a good faith effort is met for inclusion of all interested parties be they regulatory-required parties or interested members of the public.

SHPO-specific letters and Section 4(f)

The findings letter templates include language for Section 4(f) coordination with SHPO in two specific situations, if applicable: for notification of *de minimis* findings, and for the archaeological site exception under 23 CFR 774.13(b). In the past, SEO had encountered a few

cases where Section 106 letters contained other 4(f) language which was extraneous to the Section 106 coordination; this issue was not observed in this year's review.

This year's review noted no problems with 4(f)-specific language in findings letters. After noticing some issues during past reporting periods, SEO increased the frequency of reminders to PQIs and analysts that the NEPA manager should be consulted before including any 4(f) language, and that SEO cultural resources staff should additionally be consulted before including language not offered within templates. A Section 4(f) specific module was also included in NEPA training coordinated by SEO in February 2024, at which time the NEPA manager-PQI coordination was discussed. SEO did note one project whose findings letters to other consulting parties incorrectly contained other SHPO-specific language pertaining to concurrence; these were minor cut and paste errors.

Recommendations:

PQIs and environmental analysts should work together to coordinate Section 4(f) applicability with the appropriate NEPA Manager before finalizing findings letters. PQIs are encouraged to reach out to SEO with any questions related to Section 4(f) and historic properties. PQIs should also review consulting party letters to ensure that letter contents correlate to the recipients.

4.2 Letter Enclosures on File

The reviewed projects had complete enclosure sets on file. While this review did not explicitly address the content of survey report enclosures, since it is not a 106 PA compliance topic, PQIs continue to consistently indicate that survey report review is a substantial time-consuming task.

Recommendation: PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record. For ease of reference, all figures should be listed in the enclosure list following the signature block.

4.3 Direct to Findings (DTF) Decision Documented Appropriately, if Applicable

Of the thirteen letter packages reviewed, two were processed as a DTF. Projects that do not send an initiation letter prior to sending a findings letter are required to complete a Direct to Findings (DTF) worksheet to document the appropriateness of this decision.

Project teams are expected to initiate consultation early in project development; the DTF worksheet was developed as a tool to identify occasional exceptions. Use of the DTF option and form works well to address certain types of projects. No issues were observed in this year's review.

4.4 Standard Consultation Projects Followed Historic Roads Guidelines

Historic roads consideration for standard consultation projects is found within Appendix J of the Section 106 PA. This appendix provides guidance on when a road DOE is needed, and how to conduct such a DOE if one is required. Appendix J.I outlines scenarios where historic road identification is not necessary. Appendix J.II describes the processes for identification and evaluation of historic roads.

Overall, the incorporation of historic roads consideration into the Section 106 PA process has seen many successful examples of cooperative consultation between the SHPO's office and DOT&PF. Staffing turnover has presented somewhat of a challenge, as the process for historic

roads consideration was specifically tailored over many years, and differs from the DOE process for other property types. SEO continues to offer training as needed on this subject.

Recommendation: SEO, region PQIs, and SHPO should continue to work closely together to ensure that historic roads consideration is implemented efficiently and smoothly into project development. SEO will continue to look for opportunities to provide training at DOT&PF and OHA as needed in relation to historic roads consideration.

4.5 Confidentiality Guidelines Followed as Applicable

No issues were observed in the reviewed projects. Overall, the PQIs are ensuring site confidentiality during the Section 106 process, and there does not appear to be a broader issue regarding Section 106 consultations at this time. SEO continues to coordinate cross-regionally with REMs and PQIs to emphasize with environmental staff, project managers, and consultants to be aware of existing guidance in the DOT&PF PEL guidebook, cultural resources confidentiality guidance, and OHA AHRS policies to forward to re-emphasize confidentiality issues for public-facing reports. SEO is also updating the cultural resources confidentiality guidance on the DOT&PF historic properties webpage to more specifically address PELs and other reports released for public review.

4.6 Assignment Notification under NEPA Assignment MOU

The Section 106 PA Appendix D requires that assignment status be indicated in consultation. Additionally, the NEPA Assignment MOU requires that certain language be included on the cover page of reports, or included in the environmental document as part of the project's record.⁴ Under NEPA Assignment, all FAHP projects are presently assigned.

All of the reviewed letters contained the language required by the NEPA Assignment MOU. The program review noted one instance where the survey report enclosure prepared by a consultant was lacking the MOU language on the cover page; however this was due to the fact the report had been prepared in 2011, prior to assignment, and the accompanying findings letter did contain the required language.

Recommendation:

PQIs should continue to ensure the MOU assignment language is present on all report covers, regardless of internal or external authorship

4.7 General Observations

This year SEO reviewed a larger proportion of letters than in past years, and the review revealed no major issues, and a relatively small amount of minor issues. PQIs work hard to successfully produce letters and conduct consultation under the PA, and this work is evident in the quality of materials reviewed. In general, SEO has observed that the PQIs often go the extra mile to respond to requests and coordinate between project teams and consulting parties.

⁴ The statement is "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 April 13, 2023, and executed by FHWA and DOT&PF."

5.0 Results: Project Updates

There were fifteen updates of previous reviews or consultations in the review set. Nine were processed via streamlined review, and six through standard consultation under Appendix D. Project update processing has become more consistent over the past few years. The most important aspect--ensuring that project changes are being incorporated into updated Section 106 review--appears to be operating well.

Updates via Streamlined Review

Streamlined review may be employed for an update if the PQI determines that all of the new proposed work falls within the Tier 1 and 2 parameters, including all conditions. It can be used for projects which originally completed the Section 106 process with either standard consultation or streamlined review.

No issues were observed with streamlined review updates in the review set. All forms were clear in terms of what work was new and what was being updated; figures also helped to clarify any adjustments in APE. The streamlined review approach to project updates has been beneficial in terms of time saving for project delivery, and in terms of allowing PQIs to focus efforts on more complex project changes and new projects.

Updates via Standard Consultation

If an update falls outside the parameters for streamlined review, the project is updated via consultation letter according to the protocols in the 106 PA Appendix D. The expectation is that there would be a new findings letter, including all parties from the original consultation, if there are substantive changes. As clarified in prior program review reports, an update with SHPO alone may be appropriate if: the minor nature of an update's scope, scale, and lack of effects are clear; there were no previous consulting party concerns; and SHPO agrees with the approach. The rationale behind this decision requires documentation in the project file.

No major issues were observed in the review set. SEO noted several examples of best practices in update letters. These included steps to make it clear to consulting parties that the update was a continuation of consultation, and not consultation on a new project, such as language to indicate what has changed since previous consultation, e.g., APE expansion and continued findings of effects. Reviewers also noted a best practice strategy of clearly indicating original APE and APE change in figures appended to several of the update letters.

Updates which are processed as standard consultations generally fall into two types: 1) updates where the project has changed, and 2) updates when 5 years or more have passed since the project's last findings letter. When an update occurs due to this passage of time, DOT&PF's practice is to reach out to consulting parties to re-initiate consultation before making an updated finding. This practice takes into account that the individuals receiving consulting party letters may have changed in the interim, and may be unfamiliar with the project. Exceptions can be made in coordination with SEO.

SEO observed multiple examples of regions using graphics in addition to text to clearly show how an APE had changed in an update letter, when applicable. These included depicting the original consultation APE in one color and the adjusted APE in a different color, or otherwise using symbology to clearly differentiate between original APE and what had changed. Efforts to make this clear for all consulting parties were evident. In the case of one complex project, the

mapping was somewhat unclear as to the change in APE. However, the letter narrative was well-worded and clearly explained what was happening in the consultation. PQIs generally rely on a project team's analyst for mapping support, and SEO recommends that project managers provide additional mapping services to PQIs navigating complex projects and updates.

In another complex and multi-year project, the original project description and APE were unclear from the update letter, and a report prepared for the original consultation was referenced but not included as an attachment. SEO will remind PQIs of best practice to include all relevant documentation as enclosures, not merely as references.

Additionally, some projects require follow-up findings letters prepared in response to SHPO or consulting party requests for more information to support a DOE or finding. These are entered in the reporting database as updates to distinguish them from the original findings letters, but are essentially follow-up communications to complete the project's Section 106 consultation. In some cases, these letters may be somewhat difficult to follow for a cold reader as they exist as part of a larger conversation. One project in the review set was a complex consultation that had been ongoing for years, and to a cold reader the update letter was unclear on what had changed. In this case, consulting parties had been in continuous communication and the updates were likely only unclear to an outside party.

Recommendation:

Overall, the 106 PA has provided a valuable mechanism for streamlining minor updates through the Programmatic Allowances. PQIs should continue to follow the established protocol either with streamlined project review or approved letter templates. If a gap in correspondence of five or more years has occurred, PQIs should re-initiate Section 106 consultation prior to sending findings. Updated findings letters and streamlined reviews should clearly reference previous consultation to a degree that allows a cold reader to follow along. Previous consultation descriptions should be included along with a clear narrative on why the update letter is being sent—in terms of what has changed, what is being communicated to consulting parties, or what updates are being provided.

In the case of projects sending an update letter to SHPO or other consulting parties to follow up on a DOE or other project-specific detail, SEO recommends that the letter still contain a map depicting the project as a whole to orient any new reader who may read the letter. An update letter should clearly state the findings for the project as a whole in the conclusion of the letter, rather than exclusively focusing on the changed portion or activity of the project, or simply additional information in the case of a further-information request. Update letters should furthermore include reports and documents sent with original letters, if they are referenced. SEO is available to review and assist with letters for optimal organizational flow when complex situations arise beyond the coverage of existing templates.

6.0 Conclusion

This monitoring review provided an opportunity to observe how the 106 PA processing evolved and strengthened during the reporting year. Best practice areas continue to include good coordination among PQIs and the OHA Cultural Resources Liaison and SEO; good work by PQIs in communicating with region staff on application of the 106 PA; consistent communication with NEPA managers on Section 4(f) language prior to letter submittal;

explaining updates; transitioning to the use of the BPM for streamlined review form creation; and generally strong file documentation.

Key recommendations from the FFY24 review are summarized below.

Streamlined Reviews

- For Tier 1 projects, PQIs should continue to work with project teams to clarify proposed activities to confirm a project does not necessitate Tier 2 processing. This includes noting how allowance specific conditions are met.
- PQIs should continue to carefully define and document Tier 2 APEs and assess whether projects qualify for Tier 2, or should go to standard consultation.
- Tier 2 General Conditions should continue to be individually acknowledged, with clarifying statements, in the Tier 2 processing package. Any Tier 2 or Tier 1 allowance-specific conditions should also be acknowledged.
- In the case of Geotech streamlined forms, it is recommended that the streamlined review update form clearly indicate what the APE is for the geotechnical activities and if necessary, differentiate this from the larger project APE. For Geotech updates, the new geotechnical work should be clearly differentiated from the original.
- PQIs should continue to work closely with analysts to get up-to-date project information for efficiency when preparing an update form.

Standard Consultations

- PQIs should continue to verify that all required consulting parties are included in correspondence, including ANCSA corporations and local governments, and that federally recognized tribes receive letters with the G2G language at all points in the consultation. PQIs should ensure that federally recognized tribes receive the Consultation Options form with initiation letters. PQIs should review consulting party letters to ensure that letter contents correlate to the recipients.
- Recordkeeping: PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record, and should proofread letters for inclusion of required template information. PQIs should ensure that APE figures use Section 106 terminology and are consistent with the APE delineation in the letter. PQIs should ensure the MOU assignment language is present on all report covers, regardless of internal or external authorship. Regions should send email notifications to SEO when correspondence includes an SEO courtesy copy. When submitting DOEs for built environment properties, PQIs should ensure the historic property boundary has been defined.
- PQIs and environmental analysts should work together to coordinate Section 4(f) applicability with the appropriate NEPA Manager before finalizing findings letters. PQIs should continue to consult with both a Statewide NEPA Manager and the Statewide FHWA Cultural Resources Manager before signing findings letters that vary from the protocol in the posted letter templates with regard to 4(f) related language.

- SEO, region PQIs, and SHPO should continue to work closely together to ensure that historic roads consideration is implemented efficiently and smoothly into project development.

Project updates

- Updates should continue to clearly delineate what is being updated in the current consultation. This should include not only a narrative description, but graphics that clearly demonstrate the reason for the update. If the update is to provide additional requested information, rather than address a change in project activities or APE, that should be clearly explained in the letter. Any previous enclosures sent with prior letters should be sent again to ensure that all consulting parties have complete documentation necessary to understand the update and finding.
- If a gap of five years or more has occurred, PQIs should re-initiate consultation prior to sending an updated findings letter.
- If a letter is prepared to update a project previously processed via streamlined review, the letter should clearly reference the project in its entirety.
- An update letter should clearly state the findings for the project as a whole in the conclusion of the letter, and not exclusively focus the finding on the changed portion or activity of the project.

DOT&PF will continue to identify best practices and areas in need of improvement during the coming years under the agreement and will continue to work closely with the signatory partners to ensure the streamlining provisions of the 106 PA are achieved while maintaining compliance with Section 106 regulatory provisions.

Appendix 3

Review Checklists

CRT Review Checklist for 106 PA Streamlined Projects, FFY 2024

Project:

Reviewer:

	Y	N	U	N/A	Comments
Signed Streamlined Review form	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Complete final copies of all referenced attachments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For Tier 1 projects*, documentation supports Tier 1 classification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For Tier 2 projects, adequate APE description/documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For Tier 2 projects, adequate documentation that General Conditions were considered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For Tier 2 projects, Historic Roads Analysis documented (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For Tier 2 projects, if specialized PQI expertise was needed, it was obtained	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For project updates, appropriate process and documentation (i.e., update forms and consistency with 6/9/15 SEO guidance memo)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

* Defined as those where all the activities qualify as Tier 1. Projects with mixed activities are considered Tier 2 projects.

U = unknown

Additional Comments:

CRT Review Checklist for 106 PA Appendix D Consultation Projects, FFY 2024

Project:

Reviewer:

Please check for final versions of documentation, with signatures where appropriate. ***Steps that occurred prior to the reporting period (Oct 1, 2022-Sept 30, 2023) are not covered by this review.***

<i>General Consultation and Documentation (all reviews)</i>	Y	N	U	N/A	Comments
Regulatory-required parties were included: SHPO, federally recognized Tribes (FRT), ANCSA corps (regional and village as applicable), local gov't	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Letters follow currently approved* templates:					
• All letters contain required 327 MOU language per templates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• APE is defined so that its extent is clear in narrative and/or figures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Initiation letters to Tribes (FRT) include consultation options form	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Letters to FRT have G2G template language (<i>applicable to initiation, findings, and updated findings</i>)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Letters to FRT (and ANCSA corps) include language requesting consultation on places of traditional religious and cultural importance (<i>in initiation letters, as well as findings if project is DTF</i>)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Findings letter(s) to SHPO handle Section 4f according to templates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• SHPO-specific language limited only to SHPO letters, and not carried into other parties' letters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Letter enclosures on file	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

* Templates were last updated 8/24/20, with minor adjustment to reflect NEPA Assignment MOU renewal in spring 2023.

CRT Review Checklist for 106 PA Appendix D Consultation Projects, FFY 2024

If Direct to Findings, decision documented appropriately	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reports contain required 327 MOU language on cover [327 MOU, 3.2.5]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Confidentiality guidelines (<i>pp 3-4</i>) followed for letters & enclosures as applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
File indicates how any documented tribal and consulting party concerns were addressed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

U = unknown

<i>Add'l for project updates:</i>	Y	N	U	N/A	Comments
Appropriate inclusion of consulting parties; if SHPO only, rationale is documented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The update references the previous consultation (or streamlined review) and indicates what has changed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

<i>Add'l for adverse effect projects:</i>	Y	N	U	N/A	Comments
File indicates that SEO was consulted prior to making the finding, per PA Appendix D (D.2), and included in development of the MOA (E2.b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
File indicates ACHP was informed of adverse effect finding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For completed consultations, file includes executed MOA with all signatures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For completed consultations, file indicates that signed MOA was transmitted to the ACHP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

CRT Review Checklist for 106 PA Appendix D Consultation Projects, FFY 2024

Optional overall comments *(Review would not be looking for differences in professional judgment, but for situations that may set precedents; indicate unusual evolution of eligibility trends; illuminate a process inconsistency or an area for improvement; or that could be considered a best practices example, etc.)*