

## **Annual Monitoring Report**

### **Alaska Federal-Aid Highway Program Section 106 PA October 1, 2020 - September 30, 2021**

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 12, 2022

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Appendix 1: Project Lists

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## 1.0 Introduction

This report summarizes the Alaska Department of Transportation & Public Facilities' (DOT&PF) Federal Fiscal Year (FFY)21 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, 2017<sup>1</sup>.

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).<sup>2</sup> 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 FFY21, all 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.<sup>3</sup> 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.<sup>4</sup> Projects that do not qualify for streamlined review are processed through standard Section 106 consultation, described in Appendix D of the 106 PA.

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<sup>1</sup> 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).

<sup>2</sup> *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.

<sup>3</sup> 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.

<sup>4</sup> 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.

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 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, 2020 through September 30, 2021, 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 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.

### 2.1 Project Totals and Comparisons by Type

Altogether, 90 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.<sup>5</sup> 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 FFY21 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.

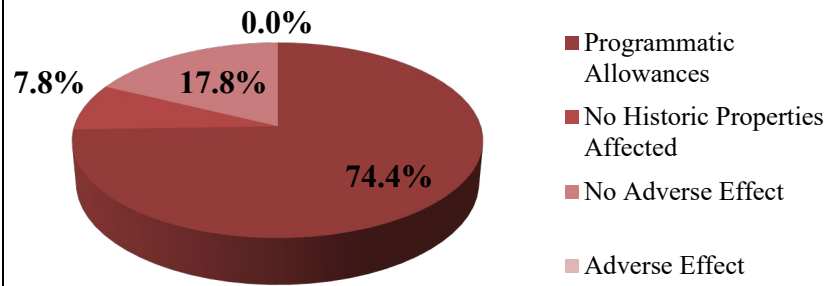
**Table 1: Number of Project Reviews Completed Under 106 PA**

Project Review Applicable Tier or Finding	Streamlined Reviews	Standard Consultation	Total
Tier 1	16		16
Tier 2	51		51
No Historic Properties Affected		7	7
No Adverse Effect		16	16
Adverse Effect		0	0
Total	67	23	90

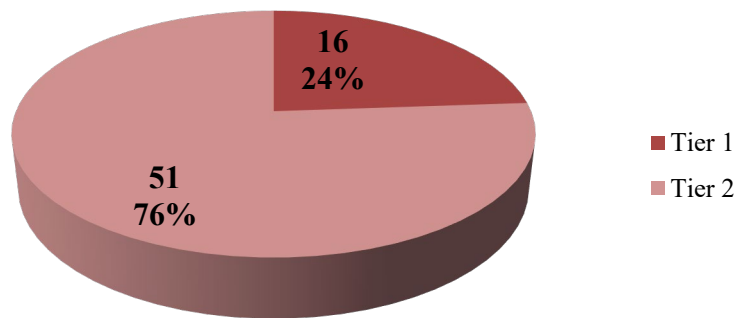
Figures 1 through 3 present numbers and percentages for the Alaska FAHP as a whole.

<sup>5</sup> In the FFY15- FFY20 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 FFY21 report retains this approach.

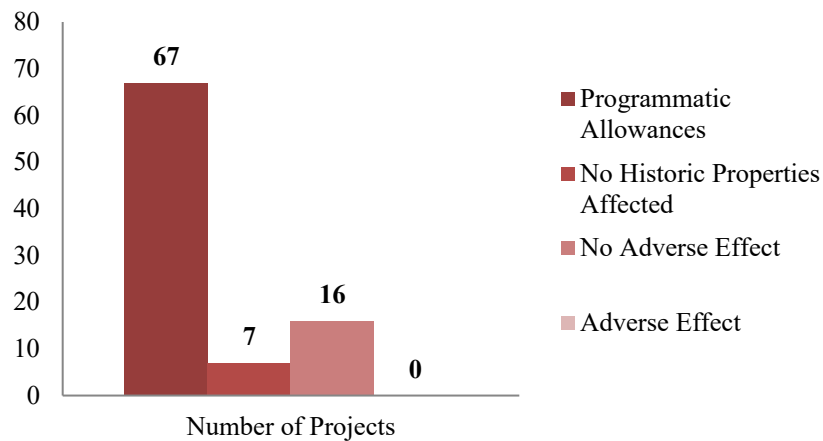
**Figure 1. Federal-Aid Projects by Finding**



**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 7 findings of No Historic Properties Affected, 16 findings of No Adverse Effect, and 0 Adverse Effect findings.

The number of projects with a completed Section 106 action under the 106 PA was down from last year and pre-pandemic years, which may have been due to continued disruptions from the pandemic affecting some projects in development.

Similar to the previous year’s reporting results, in FFY21 there was a larger proportion of streamlined review projects (67) than Section 106 consultations (23). The overall percentage of streamlined reviews was 74% of the total project reviews under the 106 PA. In FFY15, FFY16, FFY17, FFY18, FFY19 and FFY20 the percentage was similar, at 60%, 58%, 59%, 67%, 74%, and 76% respectively. Most of the FFY21 streamlined reviews qualified under Tier 2 (76%), which was also consistent with previous years (FFY15 [72%], FFY16 [66%], FFY17 [65%], FFY18 [73%], FFY19 [80%], FFY20 [77%]). This preponderance of Tier 2 projects within the streamlined review category likely reflects that minor scope projects tend 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 90 total projects completed during the reporting year, 36 were updates of projects that had undergone Section 106 review at various times in the past. Of these 36, 15 were updated through standard consultation and 21 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	15	23	65%
Streamlined Reviews	21	67	31%
Combined Total	36	90	40%

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

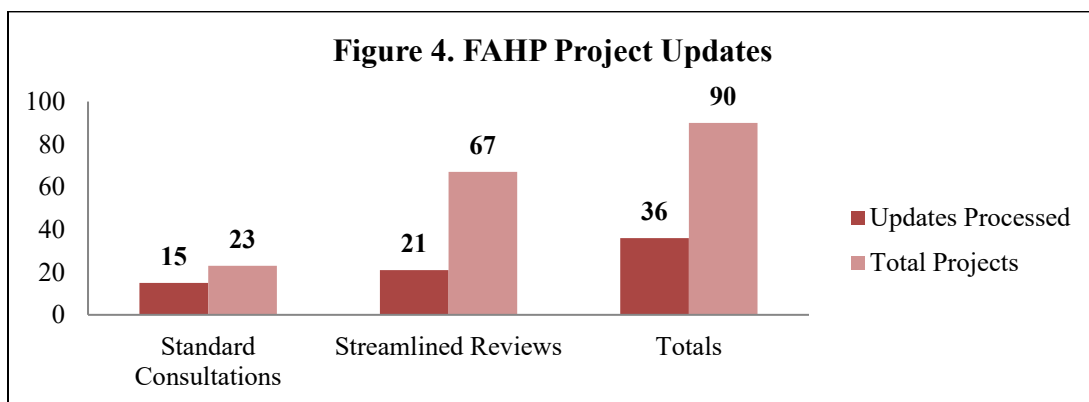
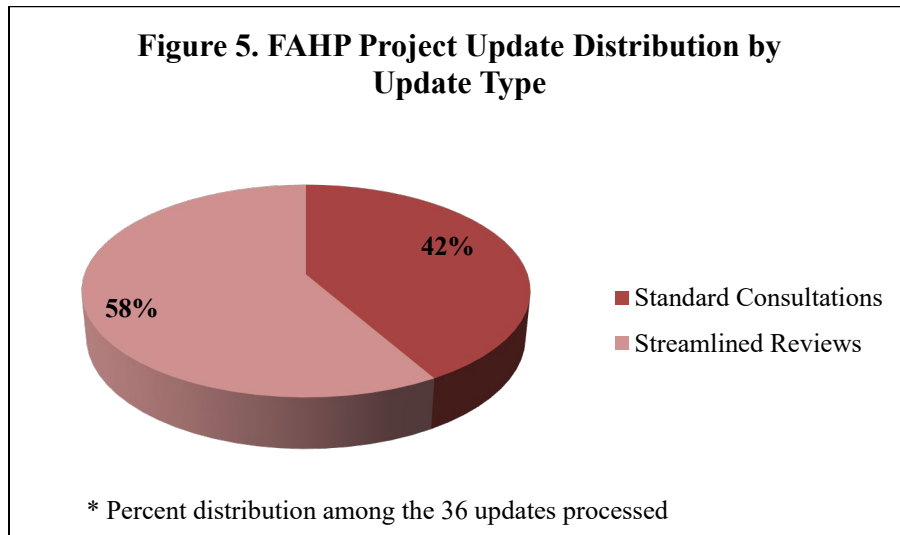
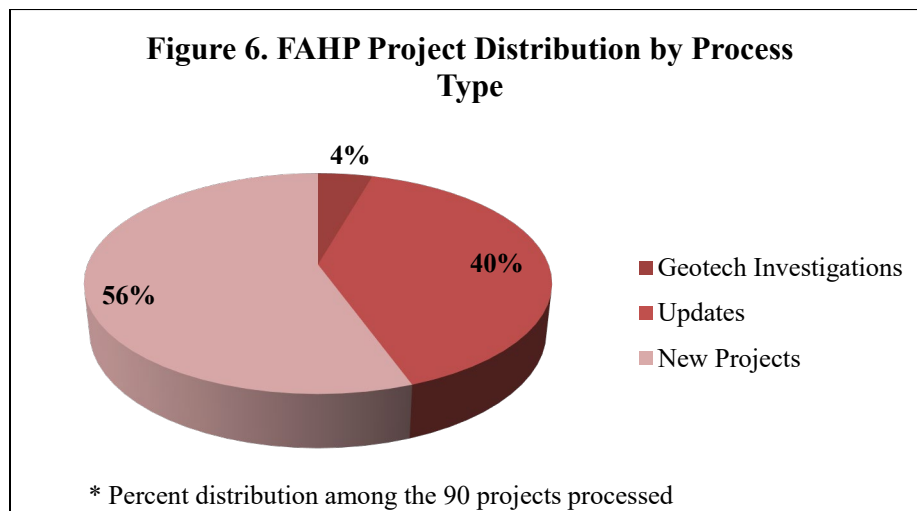


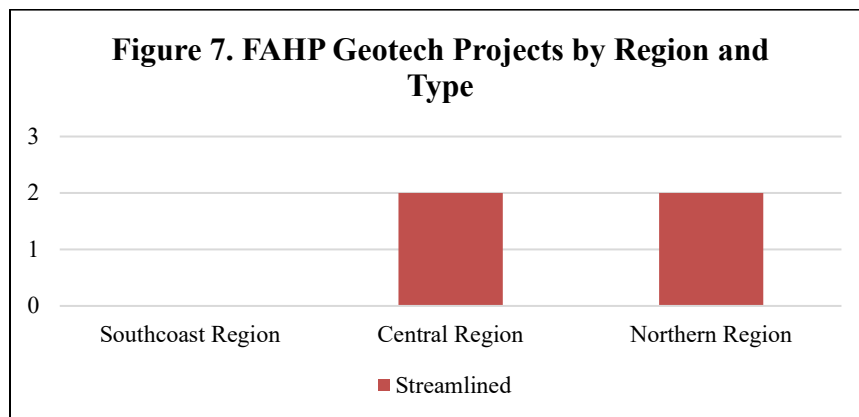
Figure 5 compares the set of updated projects according to the method used for the update.



These re-evaluations and updates represent a significant portion of all projects processed under the 106 PA during the reporting year, accounting for 40% of all projects, and almost a third (31%) of all streamlined reviews. The reduced processing timelines 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. Although the number of geotech reviews was down in FFY21, which was likely related to a lower number of new projects being introduced in the regions, the efficacy of this review process continued to be important. Geotech projects accounted for 4% of the total projects processed during FFY21 (Figure 6). Of the four standalone geotech investigations processed, all qualified for streamlined review (Figure 7). In terms of streamlined review, geotech projects accounted for 6 percent of all projects processed with programmatic allowances.





## 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
- Project Type: identifies program assignment (i.e., “FHWA assignable” or “FHWA non-assignable”)
- 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 FFY21 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, 2020 to March 31, 2021, and April 1, 2021 to September 30, 2021. 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 teleconference 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. Twenty-five projects were selected for monitoring review. The number chosen for review reflects approximately 28% coverage of the total processed during the reporting period. The results are presented in Appendix 2. A summary is included at the end of this section.

#### **3.1 Ongoing Pandemic Adjustments and Adaptations**

In March 2020, the worldwide COVID-19 pandemic altered the way work was carried out on a broad scale, a situation that has continued through the date this report was prepared. At DOT&PF, most office staff moved to telework status. Some PQIs continued to work in the office while others worked from home. DOT&PF and other departments at the State of Alaska widely adopted the use of video communications and screensharing technology to aid in geographically dispersed team communications. This proved useful for collaborating to keep projects moving ahead. Throughout the reporting year, PQIs and other DOT&PF staff operated in a variety of in-office, telework, and hybrid telework modes. With SHPO staff and other consulting parties likewise teleworking, PQIs continued to utilize email delivery for Section 106 documentation. Since many rural areas and tribal communities began operating with protective travel restrictions in 2020, and many restrictions either remained in place or are reoccurring in relation to state and local Covid case counts, virtual meetings remain predominant.

In this environment, on-boarding and assisting newer environmental analysts and PQI staff to learn the details of Section 106 practice has been challenging. As many other organizations and new staff have found, learning the ropes during remote or hybrid on-boarding is complicated by needing to learn an organization's structure, protocols, and sources of assistance, in the absence of many former opportunities for gaining that insight. As such, on-the-job guidance for newer staff has become more time intensive. SEO dedicated some SEO PQI and NEPA manager staff time to assist. As noted later in Section 4.7, a distance-delivered training session was presented for analysts, PQIs, and project managers covering the general Section 106 process and the Section 106 PA, in November 2021.

Also in response to the pandemic, in March 2020, the Alaska SHPO invoked tolling regarding the review timelines outlined in 36 CFR 800. Under tolling, the 30-day regulatory clock that would allow agencies to proceed with an undertaking following non-response after 30 days is suspended and SHPO would be allowed to comment beyond that timeframe. SHPO remained in tolling status throughout the FFY21 reporting year, but aimed to adhere to the reduced review

timelines laid out in the FHWA Liaison MOU<sup>6</sup> as much as possible. As such, tolling did not affect DOT&PF reviews during the fiscal year, with SHPO largely able to meet the timelines specified in the MOU.

## **3.2 Accomplishments**

### *General PA Operation*

Overall, DOT&PF continues to operate successfully under the 106 PA to efficiently and effectively advance project development. PQIs and 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*

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. DOT&PF staff is pleased with the program oversight and document tracking capabilities of the database. The DOT&PF plans on continuing to use this database in the near future.

In November 2020, DOT&PF implemented a NEPA electronic database and file storage system referred to as the DOT&PF BPM system. Throughout the reporting year, and continuing during the preparation of this report, DOT&PF is working on a Section 106 component for the BPM system. Once implemented, this component would allow for the creation of streamlined review forms within the system and for standard consultation data entry. Reports and queries would be generated within the system to allow for tracking and analysis. During FFY22, DOT&PF plans to consult with FHWA and SHPO on layout adjustments to the streamlined review form prior to implementation of the BPM 106 component.

### *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.

## **3.3 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.

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<sup>6</sup> *Memorandum of Understanding Among the Federal Highway Administration, the Alaska Department of Transportation and Public Facilities, and the Alaska Department of Natural Resources Office of History and Archaeology Regarding the Provision of a Cultural Resources Liaison*, Sept. 2017.

### **3.4 Emergency Situations**

During the FFY19 reporting year, the DOT&PF responded to a magnitude 7.1 earthquake, which was centered about 10 miles north of Anchorage. Though the majority of the earthquake projects were processed during FFY19 and FFY20, a small number of follow-up permanent repair projects carried over into this reporting period.

No new emergency situations occurred during the current reporting year.

### **3.5 Post-Review Discoveries**

One project reported a post-review archaeological discovery during the reporting year, on a flood repair project along the Glenn Highway. On June 14, 2021, a tribal observer from Chickaloon Village Traditional Council (CVTC) alerted DOT&PF of a potential inadvertent discovery during tribal observation and construction ceased operations in the immediate area. The Central Region PQI traveled to the site on June 15, 2021 to meet with CVTC and the DOT&PF Project Manager to confirm and document the discovery. The site treatment established with consulting parties included fencing off the site for continued avoidance and monitoring, continued tribal observation, a field report documenting the depressions, and an Alaska Heritage Resources Survey (AHRs) Site Form recorded with the Office of History and Archaeology (OHA). DOT&PF also adjusted design of the project to avoid the site.

One project which is operating under a project PA (Sterling Highway MP 45-60)<sup>7</sup> reported discoveries during archaeological monitoring; these discoveries are being addressed under separate reporting protocols per the Sterling Highway 106 PA, and are not discussed here.

### **3.6 Professional Qualifications and Training**

The 106 PA Appendix E defines the DOT&PF PQI professional qualifications and lists training requirements. There are PQIs at each of the three regions and the SEO. During this reporting year, Central Region (CR) maintained its staff of two PQIs, and Northern Region (NR) its staff of one PQI. In the Southcoast Region (SR), the long-time PQI retired, and a new PQI was brought on in April of 2021. During the interim when that region did not have a PQI, SEO PQIs assisted SR and handled Section 106 consultations and streamlined reviews. SEO also assisted the region REM with on-the-job training with the new PQI through the remainder of the reporting year. Training is discussed further in Section 4.7.

### **3.7 PQI Approval Role under the PA**

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.

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<sup>7</sup> *Programmatic Agreement Among the Federal Highway Administration; the Alaska Department of Transportation and Public Facilities; the Advisory Council on Historic Preservation; the Alaska State Historic Preservation Officer; the United States Fish and Wildlife Service; the United States Forest Service; the Cook Inlet Region, Inc; and the Kenaitze Indian Tribe Regarding the Sterling Highway Milepost 45-60 Project STP-F-021-2(15)/Z530140000*, March 2018.

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 FFY21 monitoring review included a checklist question on this topic; no issues were observed. This topic will continue to be included in the annual refresher training.

### **3.8 Project Updates**

Projects may require Section 106 updates during subsequent project development and construction. During this reporting year, updates comprised over a third (40%) of the projects processed. While some updates required additional consultation under the Appendix D standard consultation protocol, the majority of updates (roughly 58%) 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 (21) this year and the typical review time saved for each (30 days) results in potentially 630 project development days saved.

### **3.9 Public Objections**

The reporting database did not indicate any public Section 106 objections for projects processed under the 106 PA during this reporting period. The database indicated that consulting parties, including SHPO, responded to five projects with substantive comments or requests for more information.

### **3.10 Resolution of Adverse Effects**

During the FFY21 reporting year, no new projects made findings of adverse effects. Other projects with Section 106 actions during this reporting period involved ongoing consultations for adverse effects.<sup>8</sup> These were the Takotna River Bridge Replacement and the Glenn Highway MP 53-56 projects, which were also discussed in last year's report. 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).

The Takotna River Bridge Replacement project submitted a finding of Adverse Effect during FFY20. During the current reporting year, consultation continued on the agreement document to resolve the adverse effect. The MOA for the Takotna River Bridge Replacement project was executed on April 2, 2021. The project followed the 106 PA requirements for SEO approvals.

The reporting year also included discussions on the status of the Glenn Highway MP 53-56 MOA. Along the same geographic area, DOT&PF participated as a consulting party in discussions for an FHWA-led Programmatic Agreement 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.

Additionally, as noted in previous years, the Sterling Highway MP 45-60 project has a Programmatic Agreement (PA) for its Section 106 compliance (executed on March 2, 2018). Central Region produces a separate annual report for that PA.

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<sup>8</sup> This report does not address projects outside the purview of the Section 106 PA.

### 3.11 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>

### 3.12 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 the difficulties of remote work; 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.

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 the Area of Potential Effect (APE) for Tier 2 projects and assess whether projects qualify for Tier 2.
- Tier 2 General Conditions should continue to be individually acknowledged in the Tier 2 processing package. Any 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.
- PQIs should continue to work closely with analysts to get up-to-date project information to determine whether additional historic roads consideration is necessary. PQIs will continue to work with SEO and SHPO when questions arise regarding historic roads and the use of streamlined review.

#### *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.
- Recordkeeping: PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record. 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 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.
- 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.

## **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, 2022 in accordance with Stipulation IX.D.2.c.i. The Annual Meeting was held on March 29, 2022 with representatives of DOT&PF SEO, OHA, and FHWA. The ACHP was invited but was not able to attend.

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 taken into account. 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 is a key benefit of the PA for both the DOT&PF and the 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. 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 is 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.

*Recommendation:* No substantial concerns are identified at this time and the 106 PA should remain in effect.

#### **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.

*Recommendation:* None at this time.

#### **4.4 Historic Roads Consideration**

In February 2019, DOT&PF transitioned from using the separate Alaska Roads PA<sup>9</sup> 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.<sup>10</sup> Appendix J also contains a section

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<sup>9</sup> 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.

<sup>10</sup> 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 DOT&PF Historic Properties website at [http://www.dot.state.ak.us/stwddes/desenviron/assets/pdf/resources/historic\\_2019/akroads\\_methodology.pdf](http://www.dot.state.ak.us/stwddes/desenviron/assets/pdf/resources/historic_2019/akroads_methodology.pdf)

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. SEO had begun coordinating with FHWA and SHPO on updates to J.V reflecting observations of its first years of use. This effort was not pursued during the FFY21 due to other program and project priorities.

#### **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. Another region has requested SEO to look at the possibility of including an allowance to address winter trail markers which will be placed on top of the ground surface. SEO has also received a suggestion to accommodate mowing of medians under Tier 1.

*Recommendation:* DOT&PF will present suggestions at the annual meeting, 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.

#### **4.6 Geotech Investigations**

A programmatic allowance for geotech investigations was added to the Sec 106 PA in December 2017, during the FFY18 reporting year. As discussed earlier in this report, the geotech Tier 2 allowance provided helpful time savings during the past reporting year. Four geotech investigations were processed during FFY21 and the programmatic allowance was used for each of those investigations; using the standard 30-day period as a time estimate, the allowance saved an estimated 120 project days. 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.

#### **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 as a training opportunity for PQIs from all regions.

The FFY21 training year was impacted by the adjustments to COVID-19 and remote working. OHA's annual workshop in Anchorage was cancelled again in 2021. Remote working groups such as the CRT continued to serve as venues for communication and informal training by SEO. The Alaska Anthropological Association's 2021 conference was presented virtually and free of registration charges, allowing greater access to staff to participate in sessions, and the 2022



conference was held virtually as well. Additionally, the AME60 summer 2021 meeting and the AASHTO cultural resources subcommittee's annual fall 2021 meeting were held virtually, allowing SEO cultural resource staff to attend these events.<sup>11</sup>

SEO coordinated with 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, which was presented shortly after the reporting year ended, in November 2021. This course was structured with 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 was well received, and the compressed basic-to advanced structure is useful for optimizing available time for attendees with various roles in the Department. The ACHP also offers digital classroom workshops. SEO will also provide recommendations for these trainings to regions when new hires come on board.

During this reporting year, the long-time PQI in SR retired, and a new PQI was brought on. SEO assisted the region REM with on-the-job training and project-level assistance with the new PQI. In the upcoming year, SEO will continue to mentor the new SR PQI. Additionally, an SEO PQI left DOT&PF during the first quarter of FFY22, and SEO will be training the newly hired PQI beginning the second quarter of FFY22.

The monthly CRT staff meetings also provide a regular opportunity for informal discussions and clarifications on Section 106 processing under the PA, as needed. Additionally, there has been some analyst staff turnover in regions since SEO presented Historic Roads rollout training in February 2019. SEO plans to develop remote-delivered training to help bring new analysts up to speed on this topic.

*Recommendations:* SEO will work with new PQIs at SR and SEO 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](#).

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

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<sup>11</sup> AME60 is the identifier for the Transportation Research Board's standing subcommittee on Historic and Archeological Preservation in Transportation. AASHTO is the acronym for the American Association of State Highway and Transportation Officials.

position. The AHRS MOU between DOT&PF and OHA was renewed on 8/16/2021. 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 2021, 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, 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.

## 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
- Project Type: identifies program assignment<sup>1</sup> (i.e., “FHWA assignable” or “FHWA non-assignable”)
- 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

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<sup>1</sup> Assignment as related in this table refers to the assignment status at the time the action occurred during the FFY21 reporting period.

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Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
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Seward Highway MP 25.5-36 Trail River to Sterling Wye Rehabilitation	54659	0311031	FHWA assignable	Yes	2.c, 2.q	7/28/2021
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Geotech testing along the Seward Highway using tracked drill rig and excavator. 25 holes in existing road; 33 beside the roadway of which 19 are in new ape; and 9 bucket excavation pits. Holes are 8 inches, bucket is excavator scoop, veg clearing by hand tools, all holes to be backfilled.

Parks Hwy Bridge Replacement Montana and Sheep Creeks	58976	2015-01644 (0A41034-	FHWA assignable	Yes	2.d	1/19/2021
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Replace two culverts on the Parks Highway in the north approaches to the Sheep Creek bridge.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>Parks Highway: Goose Creek Bridge Replacement</b>	<b>CFHWY 00217</b>	<b>0A41036</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>2.d, 2.l</b>	<b>2/25/2021</b>

Relocate utilities; improve drainage along Parks Highway in approach to Goose Creek bridge.

<b>Glenn Highway Bridge Deck Preservation</b>	<b>CFHWY 00523</b>	<b>TBD</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 1.e, 1.f, 1.i, 1.l, 1.r, 2.c, 2.g, 2.l</b>	<b>6/8/2021</b>
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DOT&PF is proposing to rehabilitate the bridge decks of three bridges in the Municipality of Anchorage: # 1885 (southbound Knik River bridge), #1121 (northbound Knik River bridge), and # 1155 (northbound Peters Creek bridge). Additional work would include the following: repairs to road structural sections; improvements to drainage facilities; replacement or repair of guardrail and guardrail end treatments, signs and striping, bridge decking, safety-related bridge structures; vegetation clearing and grubbing; removal or upgrades to existing integrated bridge de-icing system; upgrades to existing RWIS system; and utility adjustments.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>Anchor Point Road MP 0-1.3 Pavement Preservation</b>	<b>CFHWY 00601</b>	<b>0001699</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 2.c, 2.g, 2.h, 2.i</b>	<b>6/30/2021</b>

Proposed actions for this project are: improving subgrade, milling, paving, crack sealing and reapplying striping to road surface. Drainage improvements including: culvert replacement, cleaning storm drains and ditch reconditioning. Intersection and roadway improvements may include: replacement & installation of new signage, guardrails, lane delineators, curbing, barriers, lighting & associated electrical components. Pedestrian facilities will be improved to current ADA standards, including improved curb ramps. Removal of vegetation in areas previously cleared. Relocation of utilities associated with the facilities improvements will occur as necessary. All work will be occurring within the right-of-way including the existing roadway & ped facilities.

<b>CR21 Anchorage District NHS Preventative Maintenance</b>	<b>CFHWY 00620</b>	<b>TBD</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 1.e, 2.c</b>	<b>11/17/2020</b>
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Remove debris & sediment from existing guardrails, ditch foreslopes & backslopes; remove vegetation around guardrails, ditch foreslopes & backslopes; apply surface aggregate & asphalt; clean culverts & storm drains, repair or replace damaged culverts; crack sealing; reapply pavement markings; replace damaged pole bases & other hardware, replace bulbs, ballasts, & wiring.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<p><b>North Eagle River Access Road – Powder Ridge Drive to Old Glenn Highway Pavement Preservation</b></p> <p>Improving subgrade, milling, paving, crack sealing and reapplying striping the road surface. Drainage improvements including: culvert replacement, cleaning of storm drains and ditch reconditioning. Intersection and roadway improvements; replacement and installation of new signage, guardrails, lane delineators, curbing, barriers, lighting, traffic signals weather and roadway sensors and associated electrical components. Pedestrian facilities will be improved to current ADA standards, including improved curb ramps. Removal of vegetation in areas previously cleared. Relocation of utilities associated with the facilities improvements will occur as necessary.</p>	CFHWY 00621	Pending	FHWA assignable	Yes	1.a, 1.d, 2.c, 2.g, 2.h, 2.i	6/17/2021
<p><b>Mat-Su Borough Road Repairs Nov. 2018 EQ Permanent Repairs</b></p> <p>Repair cracked embankment by compaction &amp; hydroseeding; repair sub-roadbed; repair pavement with in-kind materials; replace striping to as built condition; repair or replace guardrails &amp; guardrail end treatments; seal cracks as needed; apply stabilization material to slopes steeper than 2:1; reconstruct pedestrian pathway to original condition, function and appearance; replace culvert in original location. Pt. MacKenzie Road MP .7, 2.4, 5, 6.4, 15.3. Settler's Bay Drive MP .4 Vine Road MP 2.5.</p>	CFHWY 00648	0092010	FHWA assignable	Yes	1.a, 1.b, 1.d, 1.f, 2.d	11/16/2020

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>AMATS: Eagle River Loop Road - Eagle River Road to Old Glenn Highway Pavement Preservation</b>	<b>CFHWY 00731</b>	<b>Pending</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 2.c, 2.g, 2.h, 2.l</b>	<b>6/17/2021</b>
<p>Improving subgrade, milling, paving, crack sealing and reapplying striping the road surface. Drainage improvements including: culvert replacement, cleaning of storm drains and ditch reconditioning. Intersection and roadway improvements; replacement and installation of new signage, guardrails, lane delineators, curbing, barriers, lighting, traffic signals weather and roadway sensors and associated electrical components. Pedestrian facilities will be improved to current ADA standards, including improved curb ramps. Removal of vegetation in areas previously cleared. Relocation of utilities associated with the facilities improvements will occur as necessary.</p>						
<b>AMATS: VFW Road Pavement Preservation</b>	<b>CFHWY 00732</b>		<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 1.o, 1.q, 2.a, 2.c, 2.g, 2.h, 2.l, 2.o</b>	<b>8/3/2021</b>
<p>Resurfacing, road structural section repairs, upgrading and installing roadside hardware as necessary, bridge improvements, drainage improvements, Americans with Disabilities Act (ADA) improvements as necessary, utilities as necessary, vegetation clearing and grubbing.</p>						



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>CR21 Mat-Su District NHS Preventative Maintenance</b>	<b>CFHWY 00762</b>	<b>TBD</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 1.e, 2.a, 2.c, 2.d</b>	<b>11/17/2020</b>

Remove debris and sediment from existing ditch foreslopes and backslopes; remove vegetation from around guardrails; cut brush along road shoulder; apply surface aggregate and asphalt; clean culverts by hand or vac truck; repair/replace damaged culverts; clean and reshape the inlets and outlets of ditch culverts; crack sealing; replace bulbs, ballasts, wiring and other hardware; replace damaged pole bases; clean storm drain structures; apply pavement markings; apply non asphalt emulsion dust palliative to unpaved roads.

<b>CR21 Peninsula District NHS Preventative Maintenance</b>	<b>CFHWY 00763</b>	<b>TBD</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a, 1.d, 1.e, 2.a, 2.c, 2.d</b>	<b>11/17/2020</b>
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Remove debris and sediment from existing ditch foreslopes and backslopes; remove vegetation from around guardrails; cut brush along road shoulder; apply surface aggregate and asphalt; clean culverts by hand or vac truck; repair/replace damaged culverts; clean and reshape the inlets and outlets of ditch culverts; crack sealing; replace bulbs, ballasts, wiring and other hardware; replace damaged pole bases; clean storm drain structures; apply pavement markings; apply non asphalt emulsion dust palliative to unpaved roads.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
CR21 Non-NHS Preventative Maintenance, Anchorage District	CFHWY 00764		FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.c, 2.d	11/17/2020

Application of crack sealant; cleaning and reconditioning of ditches; repair and replacement of drainage culverts; repair and replacement of lighting components; application of surface aggregate, dust palliative and asphalt; and cleaning of storm drain structures. All repairs will be in kind with similar materials to existing.

CR21 Non-NHS Preventative Maintenance, Mat-Su District	CFHWY 00765		FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.c, 2.d	11/17/2020
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Work includes application of pavement markings; application of crack sealant; cleaning and reconditioning of ditches; repair and replacement of drainage culverts; repair and replacement of lighting components; application of surface aggregate, dust palliative and asphalt; and cleaning of storm drain structures.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
CR21 Non-NHS Preventative Maintenance, Peninsula District	CFHWY 00766		FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.c, 2.d	11/18/2020

Work includes application of pavement markings; application of crack sealant; cleaning and reconditioning of ditches; repair and replacement of drainage culverts; repair and replacement of lighting components; application of surface aggregate, dust palliative and asphalt; and cleaning of storm drain structures.

CR21 Non-NHS Preventative Maintenance, Southwest District	CFHWY 00767		FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.c, 2.d	11/18/2020
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Work includes application of pavement markings; application of crack sealant; cleaning and reconditioning of ditches; repair and replacement of drainage culverts; repair and replacement of lighting components; application of surface aggregate, dust palliative and asphalt; and cleaning of storm drain structures.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
CR21 CR Bridge Non-NHS Preventative Maintenance Program	CFHWY 00769		FHWA assignable	Yes	1.e, 1.h, 1.l, 1.m, 1.n, 1.o, 1.p, 1.q, 1.r, 2.c, 2.o	11/17/2020

Work includes bridge repairs on existing bridge surfaces, approaches, and components for the following bridges: Funny River (#978), Crescent Creek (#1021), Dry Creek (#7181), Resurrection Creek (#1025), Knik River (#539), Goat Creek (#538), Eagle River (#1739), Moose Creek (#401), Gate Two Overcrossing (#1326), and Highland Drive Overcrossing (#1327).

HSIP: Birchwood Spur and E Fairview Loop Road RR Xing Improvements	CFHWY 00785	TBD	FHWA assignable	Yes	2.j	12/9/2020
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Upgrade and replace railroad crossing grade equipment by removing, consolidating and/or relocating existing signal boxes.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Whittier Tunnel Operations 2021-2025	CFHWY 00787	TBD	FHWA assignable	Yes	1.d, 2.a, 2.b, 2.g	4/28/2021

Operation of the highway and rail tunnel including toll collection and operation of the Public Information System, provision of fire and security services; snow and rock removal, clearing, and tunnel clearing; general maintenance and repair of complete facility; maintenance and repair of equipment; scaling loose rock and excavating rock to mitigate potential rock falls at known rock fall site; install rockfall mitigation devices including rock bolts and wire mesh at the Portage Tunnel.

HSIP: O'Malley Bridge Trainsman Handrail and Fence Upgrade	CFHWY 00793	0421101	FHWA assignable	Yes	2.o	6/30/2021
<p>The project consists of removing and replacing existing handrails and fencing with new handrails and fencing that is in compliance with current OSHA standards on the railroad bridge crossing (overpass). Staging for the project equipment, materials and access to the project location will occur within the Alaska Railroad right-of-way (ROW).</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
HSIP: Palmer-Fishhook Road and Trunk Road Roundabout	CFHWY 00829	Pending	FHWA assignable	Yes	2.q	7/16/2021

Geotechnical investigation near the junction of Palmer-Fishhook Road and Trunk Road, using a track mounted drill rig with a hollow stem auger and involves drilling approximately 11 test holes in the existing roadway to determine the thickness of the asphalt and embankment conditions. Test holes will be about 8" in diameter. All holes will be backfilled.

Central Region Highways M&O-FHWA CRRSAA	CFHWY 00838B	Pending	FHWA assignable	Yes	1.l, 1.m, 1.n, 1.o, 1.p, 1.q, 1.r, 2.c	9/29/2021
<p>Roadway surface treatments and roadside hardware repair activities including gravel surface repair; crack sealing; asphalt overlay; pavement repair; bridge maintenance; pavement marking; chip seal; high float(asphalt emulsion); banding; pothole filling; gravel resurfacing. Replacement of guardrails; fences; barriers; signs; delineators; markers; luminaries and light signals. Mowing.</p>						

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Annual Report on Tier 1 and Tier 2 Undertakings  
Northern Region  
10/1/2020 - 9/30/2021

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Rosie Creek Road Improvements	NFHWO 0017	0002353	FHWA assignable	Yes	2.i	4/20/2021

Relocate underground utilities within the road bed of Rosie Creek Road. Utilities will be replaced in the same location at the same depth. No new ground disturbance will occur.

Richardson Highway MP 35-65 Resurfacing	NFHWO 0133	0711074	FHWA assignable	Yes	2.g	6/1/2021
<p>Installing avalanche gates to the north of the Tiekel River near MP 45.5; extending a guardrail near MP 45.5; replacing &amp; extending 4 existing retaining walls by 100 feet at MP 37.75, MP 38.25, MP 39.75, and MP 40; and adding MS 71-1-006-5 (Burma Road Quarry) to the Project.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Northern Region LED Lighting Replacement	NFHWO 0277	0002(407)	FHWA assignable	Yes	2.1	12/29/2020

UPDATE 2: This update will install new replacement light pole foundations removing the current buried poles and installing 11 new concrete foundations (30-inches in diameter, 8-feet deep) along Badger and Bradway Roads. At 15 locations existing pole mounted load center locations will be removed and new Type 1 load centers will be installed. These new load centers have concrete foundations that are 34-inches x 60-inches and will be buried 42-inches deep. These will be connected to the load centers by new underground 2-inch service conduit which will require trenches 10-feet to 25-feet long. The trenches will be about 12-inches wide and 36-inches deep.

Fairbanks, North Pole, & Denali Areas Signal Interconnect	NFHWO 0345	Pending	FHWA assignable	Yes	2.1	6/21/2021
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PROJECT UPDATE: Extending APE for the installation of new lighting conduit, fiber optic cable in previously disturbed areas along the existing road, pedestrian pathway and intersections, within the existing right-of-way (ROW) approximately 400 feet south of Airport Way on the Richardson Highway.



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Elliott Highway MP 51 to 63 Rehabilitation	NFWY0 0420	0651032	FHWA assignable	Yes	2.c	3/5/2021

This UPDATE adds hydroaxe brush cutting activities within the existing ROW.

Elliott Highway MP 51 to 63 Rehabilitation	NFWY0 0420	0651032	FHWA assignable	Yes	2.q	1/19/2021
<p>Approximately 15 test holes will be spaced 250-ft to 500-ft apart. All test holes will be backfilled with auger cuttings and flagged with lath. Test holes will be drilled using a track-mounted CME-850X drill.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Steese Expressway Chena River Bridge #0231 Redeck	NFHWO 0421	Pending	FHWA assignable	Yes	1.a, 1.e, 1.f, 2.h	3/24/2021

This UPDATE extends the Project Area of Potential Effect (APE) 3/4 mile south along the Steese Expressway to just north of the Airport Way intersection. Work along this section includes: sign and guardrail replacement in existing locations where no new ground disturbance will be occurring; pavement resurfacing and re-striping; and upgrading ADA ramps at the intersection of 10th Avenue with the Steese Expressway to meet current standards.

Airport Way West Bicycle/Pedestrian Facility	NFHWO 0447	0002449	FHWA assignable	Yes	2.c, 2.g	8/4/2021
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This UPDATE alters the location of the 10-foot wide bicycle pedestrian path, previously reviewed in a 7/1/2020 streamlined review, which originally followed along Wien Lake Rd to connect the Fairbanks Airport to pedestrian facilities on Dale and Hoselton Rds. The new path alignment follows along Wien Lake Road, turns north on to Airport Way and then crosses over to Dale Road. This UPDATE also adds installation of a new Rectangular Rapid Flashing Beacon, replacement of existing lighting, replacement of existing signs, & vegetation clearing and grubbing along the Airport Way addition.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Growden Park Accessibility Improvements (ATAP)	NFHWO 0454	0002453	FHWA assignable	Yes	2.i, 2.l	2/25/2021

Project update to change the size of the multi-use separated paths from 8-foot to 10-foot, add a new access road to the parking lot, and install underground utilities to service rectangular rapid flashing beacons. The project APE has increased to accommodate this work.

Lake Louise Road Resurfacing	NFHWO 0481	Pending	FHWA assignable	Yes	1.b	6/11/2021
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PROJECT UPDATE: Addition of the placement of fill material in permafrost thaw area(s).

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Lake Louise Road Resurfacing	NFHWO 0481	Pending	FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.c, 2.d, 2.g	11/6/2020

Leveling and regrading of subbase to original grade. Resurfacing of Lake Louise Road with chip seal. Replacing culverts. Cleaning and reestablishment of slopes and ditches. Removal of brush and vegetation. Installation of new signs in new locations.

Northern Region ADA Improvements- Valdez: Hazelet Avenue	NFHWO 0503	pending	FHWA assignable	Yes	2.d	6/30/2021
<p>Repair and/or replace an existing storm drain located at the northeast corner of the intersection of Hazelet Avenue and Fairbanks Drive in Valdez, Alaska.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Wendell Avenue Bridge	NFHWO 0511	0002(468)	FHWA assignable	Yes	1.a, 2.g, 2.h	12/7/2020

Update to install ADA signage, reconstruct sidewalk to meet ADA standards, restripe parking area.

Northern Region Guardrail Upgrades- Parks, Richardson & Tok Cutoff	NFHWO 0516	Pending	FHWA assignable	Yes	2.g	7/6/2021
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This UPDATE adds new guardrail installation and extension of existing guardrails along the Glenn and Richardson Highways and Tok Cutoff, within the existing right-of-way (ROW), to the project description.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Northern Region Guardrail Upgrades- Parks, Richardson & Tok Cutoff	NFHWO 0516	Pending	FHWA assignable	Yes	1.f	11/30/2020

The project intends to replace guardrails and end terminals that do not meet current standards.

HSIP: Old Steese Shoulder Widening	NFHWO 0527	Pending	FHWA assignable	Yes	1.a, 2.a, 2.b, 2.d, 2.g, 2.i, 2.l	5/17/2021
<p>Widening of existing shoulders to a uniform 6-ft width. Addnl activities include in-kind culvert and signage replacement; guardrail replacement where the shoulders have been widened and guardrail currently exist; repaving and restriping of travelway and paving of the shoulders; re-paving of the driveway approaches to meet the new road width; replacement of utilities, drainage structures and lighting and potential relocation of the traffic signal and reconfiguration of the roadway at the intersection of the Old Steese Highway with the Steese Highway and the beginning of the Elliott Highway. All project activities, including staging will occur within the project right-of-way (ROW) and no additional ROW will be acquired.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Richardson Highway Dynamic Messaging Sign	NFHWO 0554	0002479	FHWA assignable	Yes	1.a, 1.e, 1.i, 2.g	11/9/2020

Installation of digital messaging sign and guardrail; replacement of the existing power source at the interchange; replacement of pavement and restriping where conduit is installed.

FFY21 NHS Interstate	NFHWO 0564	Pending	FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e	11/12/2020
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Maintenance & rehabilitation of NHS Interstate roadways. Work includes: application of pavement stripes & markings; stabilization & repair of shoulders & ditches; cleaning of culverts, inlets & storm drains; & repair and/or refurbishment of systems. All work will be confined to the existing roadway embankment or structure, & is intended to restore the system & its components to as-built condition. All route work is occurring on previously disturbed ground in the currently established road prism & culvert drainages.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
FFY21 NHS Non-Interstate and CTP PM	NFHWO	Pending	FHWA assignable	Yes	1.a, 1.b, 1.d, 1.e	11/13/2020

0565

Maintenance & rehabilitation of paved & gravel roadways; application of pavement stripes & markings & fog seal; stabilization & repair of shoulders & ditches; cleaning of culverts, inlets & storm drains; & repair and/or refurbishment of lighting systems. All work will be confined to the existing roadway embankment or structure, & is intended to restore the system & its components to an as-built condition. All work is occurring on previously disturbed ground in the currently established road prism and culvert drainages.

NR FFY21 Bridge PM NHS Interstate	NFHWO	Pending	FHWA assignable	Yes	2.o	2/10/2021
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0566

This UPDATE adds the Chena River Bridge (#1913), on the Parks Highway to the list of bridges receiving annual maintenance. Recast the expansion joints at each end of the bridge decking and cover with new steel nosings and slider plates.



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Chena Ridge/Chena Pump Resurfacing	NFHWO 0570	Pending	FHWA assignable	Yes	1.a, 1.e, 1.f, 2.c, 2.o	9/23/2021

Replacement of signs (same location, same depth). Replacement of guardrails (same location, same depth). Vegetation clearing (hydro-ax) to toe of slope and where guardrails are being replaced. Resurfacing Chena Ridge and Chena Pump Roads (crack repair and applying scrub seal). Bridge repair to deck and rails (Bridge #0721). Reapplication of pavement markings. Upgrading approaches (minimal chip seal apron where gravel was in place previously).

Healy Spur Road Rehabilitation	NFHWO 0580	Pending	FHWA assignable	Yes	1.d, 2.a	6/11/2021
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Rehabilitation of the roadway surface (milling, resurfacing, and applying pavement markings). Paving currently unpaved roadway shoulders. Replacement of existing culverts with same-sized culverts (locations and depths will remain the same, no new ground disturbance). Material Site (MS) 37-2-143-2 (Panguingue Creek Pit) at milepost 252.5 is included in the project APE.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Richardson Highway MP 329-340 Pavement Preservation	NFHWO 0583		FHWA assignable	Yes	1.a	3/3/2021

Oil based seal and chip seal band pavement cracks.

Richardson Highway MP 329-340 Pavement Preservation	NFHWO 0583		FHWA assignable	Yes	1.a	3/24/2021
<p>UPDATE: Rehabilitate/replace segments of existing chip sealed pavement surface with chip seal pavement from MP 329 to MP 340 of the Richardson Highway.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
HSIP: City of Fairbanks Systemic Signal Upgrades	NFHWO 0592	pending	FHWA assignable	Yes	1.a, 1.e, 1.f, 2.g	4/2/2021

Replace signal poles, controller cabinets, signal faces, and load centers. Install retro-reflective back plates, signs, signal hardware, and new conduit and cable. Update existing striping. Minor surface patching of asphalt in intersections. Minor repair to existing sidewalks.

M&O FFY22 NHS Interstate Bridge PM Work	NFHWO 0622	Pending	FHWA assignable	Yes	1.m	9/8/2021
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Bridge cleaning and washing, Nenana River Bridge at Moody (#1143).

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
M&O FFY22 Non-Interstate and CTP Bridge PM Work	NFWHYO 0623		FHWA assignable	Yes	1.l, 1.m, 1.o, 1.p, 1.q, 1.r, 2.o	9/13/2021

Annual maint on bridges on Dalton, Denali, Steese, and Nome-Teller Highways; and Council, Glacier Creek, and Kougarok Roads. Bridge spall repair. Installation of new brass number plates. Removing, repairing or replacing the timber wearing surface. Replacement of missing hardware (bridge rail bolts, post hardware). Repair/replacement of bridge deck joints, expansion joints, and grout. Bridge cleaning and washing. Bridge repainting. Repairing damaged nosing. Replacing bridge rails, posts and grout pads.

Northern Region Highways Maintenance and Operations FHWA CRRSAA	NFWHYO 0599B		FHWA assignable	Yes	1.a, 1.e, 1.f	8/30/2021
<p>Project will include in-kind maintenance and repairs to existing paved and gravel roadways within NR including crack sealing and banding, chip sealing and high float, asphalt overlay and pavement repairs, pothole patching, pavement marking and striping, and gravel surface repair. Additional work activities include in-kind repairs to existing guardrails, fences and barriers, signs, signals, delineators and markers, and lights/luminaries</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Parks Highway MP 315-325 Reconstruction	Z606570000	0A45028	FHWA assignable	Yes	2.q	4/23/2021

Geotechnical Investigation- includes drilling in the bedrock cuts (up to 3 test holes) and completing seismic surveys where the proposed realignments will occur. Additional work to assess the amount of overburden will be conducted using a hand auger and/or track mounted drill (if overburden is too deep) to reach bedrock. These boreholes will be drilled approximately every 100 feet, and consist of up to 20 test holes.

Parks Highway MP 315-325 Reconstruction	Z606570000	0A45028	FHWA assignable	Yes	2.c, 2.q	6/16/2021
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Geotechnical investigation: drill 20 test holes using a CME 850X Drill Rig. At discretion of field geologists- dig 2-3 trenches to define site characteristics and collect cobble count data.  
Clear vegetation using mechanical means to access undeveloped areas of the material site.

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<b>KTN Stedman &amp; Deermont St Intersection Safety Improvement</b>	<b>SFHwy 00186</b>	<b>0003244</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>2.d, 2.g</b>	<b>5/21/2021</b>
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Provide additional illumination at the Stedman/Deermont intersection in order to achieve a level of luminance that meets current DOT&PF standards. Construct a concrete sidewalk bulb-out on the Stedman side of the marked cross-walk. The bulb-out would extend from the existing sidewalk to the edge of the traveled way including required drainage improvements to accommodate the bulb-out.

<b>JNU Mendenhall Loop Road and Egan to Stephen Richards Resurface</b>	<b>SFHwy 00261</b>	<b>0966028</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>2.a, 2.d, 2.g, 2.h</b>	<b>8/13/2021</b>
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Update to a project originally reviewed in May 2020, to resurface Mendenhall Loop Road from Egan Drive to the Stephen Richards roundabout. The update extends the APE to accommodate culvert work outside ROW; project activities remain the same.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
JNU Glacier Hwy Resurface: Ferry Terminal to S. Lena	SFHwy 00297	0955020	FHWA assignable	Yes	2.a, 2.d, 2.g	10/21/2020

The proposed project would: resurface pavement, including minor structural improvements; replace or rehabilitate existing culverts and improve drainage deficiencies; replace and install new guardrail as necessary; repair existing lighting system & replace components as necessary; repair existing chain-link fencing.

Juneau Non-NHS Chip Seal 2021	SFHwy 00319	0003236	FHWA assignable	Yes	1.a, 1.b, 1.d	1/22/2021
<p>Work will include clearing ditches of brush and trees that are disrupting drainage within the right-of-way (ROW). This includes removing any built-up rock/organic berms from the shoulder of the road. Ditches will be reestablished to provide positive flow away from the road prism. Culverts will be replaced with corrugated culvert pipe or existing culverts will be slip lined, where necessary. Culvert replacement will be limited to those installed for cross drainage. No stream crossing culverts are planned for replacement. Potholes in the pavement will be repaired. No work will occur beyond the existing disturbed ROW.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>Southeast District Highway Painting 2021</b>	<b>SFHwy 00320</b>	<b>0003236</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a</b>	<b>1/22/2021</b>

The project proposes to apply and reapply pavement markings on existing facility locations throughout the Southcoast Region which currently have pavement markings for DOT&PF Maintenance & Operations (M&O). Select locations within the following areas would receive markings: Haines, Juneau, Ketchikan, Klawock, Petersburg, Skagway, Wrangell, and Yakutat.

<b>Southcoast Region Highway Painting 2021</b>	<b>SFHwy 00321</b>	<b>0003236</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.a</b>	<b>1/22/2021</b>
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The project proposes to apply and reapply pavement markings on existing facility locations throughout the Southcoast Region. All work will be completed by DOT&PF Maintenance & Operations staff. Select locations within the following community areas would receive markings: Angoon, Gustavus, Haines, Hoonah, Iliamna, Kake, King Salmon, Kodiak, and Sitka.



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Southcoast Region Crack Seal 21	SFHwy 00329	Pending	FHWA assignable	Yes	1.a	4/26/2021

The project will seal and band cracks on currently existing paved roads in the Southcoast Region in Juneau, King Salmon and Yakutat. Crack sealing will be done by applying an oil based sealant within the pavement cracks, then installing chip seal banding (or appropriate asphalt application) over the cracked areas. There will be no new ground disturbance. All work will be occurring within the existing roadbed and bridge surfaces.

2021 Juneau Ditches	SFHwy 00347	0003236	FHWA assignable	Yes	1.d	4/29/2021
<p>Ditches will be cleared of debris, brush, and organic vegetation to re-establish flow in specific locations where standing water has been identified.</p> <p>Ditches will be cleared on the following roadways: Glacier Highway, Thane Road, and North Douglas Highway.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
SR NHS Non-NHS Catch Basin Culvert	SFHwy 00358	0003236	FHWA assignable	Yes	1.d	4/29/2021

Cleaning and inspecting catch basins and culverts.

Gustavus Salmon River Bridge 444 Preservation Maintenance	SFHwy 00373	0003236	FHWA assignable	Yes	1.l, 1.n, 1.r	6/25/2021
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The proposed project activities include: repairing approach rails, replacing deck boards and broken cross-bracing at piers, as well as removing debris from around piers. All repairs and replacement are in-kind with similar materials. All work is being confined to the bridge structure. No new ground disturbance is occurring.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
PSG Emergency Culvert Replacement MP 11.6	SFHwy 00379	SDRER00323	FHWA assignable	Yes	1.a, 2.c, 2.d, 2.e, 2.f	8/6/2021

This project will remove and replace a failing 65-inch corrugated metal pipe culvert with an 84-inch aluminum structural plated pipe culvert where Letti Creek crosses under the Mitkof Highway at milepost 11.6 near Petersburg. The stream will temporarily be diverted to allow work to be performed in dewatered conditions. A rip-rap apron will also be constructed at the culvert inlet to prevent erosion. Rip-rap will be supplied from a currently active and permitted material site.

Tongass Avenue Improvements	Z68091 0000	0902042	FHWA assignable	Yes	1.a, 2.g, 2.h	9/22/2021
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This Update involves the moving of a crosswalk location and associated lighting and the addition of a crosswalk and associated lighting within the original project Area of Potential Effect (APE).

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
Haines Milepost 19 Slide Access	Z68656 0000	0003188	FHWA assignable	Yes	2.c	9/1/2021

This updates an earlier consultation from August 2020 on a project to establish an access road for debris channel flow maintenance. This update extends the APE for brush clearing for 650' along Stephens Drive.

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Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Applicable Tier 1 and 2 Activities	Review Screening Record Approval Date
<b>Weigh In Motion (WIM) Sensor Testing Pilot Project</b>	<b>N/A</b>	<b>29910</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>1.i</b>	<b>8/10/2021</b>

The DOT&PF will be installing weight motion sensors at two locations: Near milepost (MP) 10 {Milepoint 11} of the Steese Highway near Fox and MP 2.7 {Milepoint 1} of the Klondike Highway near Skagway, Alaska. Installation of the sensors is occurring at existing sites and includes the installation of the conduit that will run between the sensors and the existing sensor cabinets or conduit runs at each site. No new ground disturbance is occurring.

<b>Campbell Creek Culvert Replacement</b>	<b>Pending</b>	<b>Pending</b>	<b>FHWA assignable</b>	<b>Yes</b>	<b>2.d, 2.e, 2.f, 2.l</b>	<b>4/23/2021</b>
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Replace the existing culverts located on the Tudor Road Relay Facility Access Road in Anchorage, Alaska with one new box culvert. Specific activities include: temporary stream diversion, stream bank reconstruction (as needed), stream realignment (as needed), stream realignment (as needed), and utility replacement and/or relocation (as needed).

## **Standard Consultation Lists**

This section of Appendix 1 contains each region's list of standard consultations processed during the FFY21 reporting year.

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Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
<b>Seward Highway MP 75-90, Ingram Creek to Girdwood Road Bridge Rehabilitation</b>	<b>58105</b>	<b>BR-BH-NH-0A3-1(035)</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Adversely Affected</b>	<b>1/26/2021</b>
Utility relocation in Portage vicinity.						
<b>Colleen Street Intersection and Frontage Road</b>	<b>CFHWY 00006</b>	<b>0A15033</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Adversely Affected</b>	<b>12/30/2020</b>
Consolidate and align Colleen St and East Grandview Rd intersections with Glenn Highway; consolidate driveways to a new frontage road removing individual access to Glenn Highway and individual RR Xings; install a new RR xing incl. signs, flashers, gates, and track xing; signalize new intersection; construct new rail siding beside existing between MP 38.7 and 40.2; construct new embankment and place ballast, ties, and rails along proposed siding; modify existing at-grade RR xings at Outer Springer Loop and South Inner Springer Loop; replace or install new guardrail, signs and striping; acquire ROW; install new or rehab ditches, culverts, energy dissipaters and other stormwater mgmt facilities; relocate and adjust utilities; clear and grub veg.						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
<b>Sterling Safety Corridor Improvements MP 82.5-94</b>	<b>CFHWY 00130</b>	<b>0A33026</b>	<b>FHWA assignable</b>		<b>No Historic Properties Affected</b>	<b>1/25/2021</b>

Project remains the same as in 9/25/20 Findings. The update addressed SHPO comments on a subset of DOEs in the 9/25/20 letter, accepting these comments and confirming the original finding of No Historic Properties Affected.

<b>AMATS: Chugach Foothills NE Trail Connector: Phase II</b>	<b>CFHWY 00387</b>		<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Affected</b>	<b>2/18/2021</b>
<p>Construct a multi-use pathway on-grade and boardwalk including a bridge where the trail crosses North Fork Campbell Creek; install viewing area, benches, and bike racks; drainage improvements; vegetation clearing and grubbing; and utility relocations. The APE has been updated to address relocation and additions to trail since original consultation in 2019.</p>						



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
McHugh Road Weather Information System (RWIS) upgrade	CFHWY 00428	0106076	FHWA assignable	No	No Historic Properties Affected	9/17/2021

Installation of a new RWIS Tower and associated monitoring equipment at the McHugh Creek Day Use Area; installation of a new electrical meter near the currently existing Host camp site; installation of new power lines 2-3 feet underground extending from currently existing Host camp site to the new tower location; installation of junction boxes at the currently existing Host camp site to the new tower location; improvements/adjustments/relocation of utilities; vegetation clearing and grubbing via mechanical means; staging areas; landscaping.

Mat-Su Area Repairs Group B-Nov 2018 EQ PR	CFHWY 00706	TBD	FHWA assignable		No Historic Properties Adversely Affected	8/5/2021
<p>Replace culvert with fish passage culvert at KGB MP 14.7, stabilize slopes, replace guardrail and repave. Repair or replace retaining wall at Glenn MP 42.6. Repair embankment, repave, replace guardrail and establish a stormwater ditch along Woodworth Loop Road.</p>						

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Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
Nome Center Creek Road Rehabilitation	NFWH Y00397	0135003	FHWA assignable	No	No Historic Properties Adversely Affected	6/30/2021

Increase the ROW and APE to accommodate culvert extensions along Nome Center Creek Road.

Nome Center Creek Road Rehabilitation	NFWH Y00397	0135003	FHWA assignable	No	No Historic Properties Adversely Affected	3/25/2021
<p>Geotechnical investigation, prior to construction, using track rig along the proposed Center Creek Road realignment centerline; 20' deep spaced 300'-500' apart; and additional similar drilling at locations within the existing Center Creek Road embankment. Realign Center Creek Road at the FAA/Doyle Road Intersection; raise the road grade where needed to minimize aufeis and snow drifting; improve roadway surface; repair roadway embankment in areas of distress and settlement; install new signage. Improve drainage by installing and replacing culverts as needed (temporary diversions and/or half-width construction may be necessary for the larger diameter culverts); relocate buried utilities (power and communication) where necessary.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
<b>Elliott Highway MP 51 to 63 Rehabilitation</b>	<b>NFWH Y00420</b>	<b>0651032</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Adversely Affected</b>	<b>11/10/2020</b>

Rehabilitating the Tolovana River Bridge (#0440), replacing roadside hardware, making drainage improvements, upgrading utilities, and developing a new material site near MP 57.

<b>Bison Gulch Parking Lot Relocation</b>	<b>NFWH Y00522</b>	<b>0002470</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Affected</b>	<b>12/8/2020</b>
<p>Project activities include: removing the current parking lot on the east side of the Parks Highway at milepost 243.5; extending the guardrail from the Bison Gulch Bridge across the entrance of the current parking lot at Parks Highway milepost 243.5 to block vehicular access; installing a new parking lot on the west side of the Parks Highway at milepost 245. Material site 37-2-010-2 (Antler Creek Pit) is expected to provide the material for this project.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
Crystal Creek Culvert Replacement	NFWH Y00538	0850029	FHWA assignable	No	No Historic Properties Affected	5/5/2021

This Update adds material site (MS) 850-088-5 (University MS) to the project, and the associated haul road (McCarthy Road) to the Area of Potential Effects (APE).

Crystal Creek Culvert Replacement	NFWH Y00538	0850029	FHWA assignable	No	No Historic Properties Affected	12/16/2020
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Replace the existing culvert with a larger culvert that requires a grade raise, and an increase in the road prism footprint. All project activities and staging areas would be within the existing DOT&PF right-of-way (ROW) for the McCarthy Road. Gravel needed for the project would be from the following material site (MS): MS 850-085-5 (Chokosna/Wood Pit).

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
Fairbanks Area PM 2.5 Motor Vehicle Plug-ins	NFWW Y00555	pending	FHWA assignable		No Historic Properties Affected	4/30/2021

Project activities include installing electrical motor vehicle plug-ins and associated electrical conduit at the following Fairbanks-area facilities: Tanana Lakes; Chena Lakes; Birch Hill; University of Alaska U-Park Building and completing subsurface drainage improvements where required.

Alaska Highway MP 1222-1227 Resurfacing	NFWW Y00589	pending	FHWA assignable	No	No Historic Properties Adversely Affected	6/28/2021
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Pavement preservation of the Alask Hwy between MP 1222-1227 (crack sealing and/or milling, re-paving road surface, reapplication of pavement markings); Minor embankment work (reestablish roadway profile); Improving curb ramps to meet Bridge work at Scottie Creek Bridge #0501 (reconstruct approaches, replace bridge approach rails, minor bridge upgrades); Replace existing roadside hardware (guardrails and signage); Drainage improvements (surface treatment, Culvert Replacement if needed); Clearing vegetation in previously cleared and maintained areas to the toe of slope; Reconstructing driveway approaches; Underground utilities work.

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
M&O FFY22 Non-Interstate and CTP Bridge PM Work	NFWW Y00623		FHWA assignable		No Historic Properties Adversely Affected	9/20/2021

This update adds 15 bridges to the project APE.

Shageluk Airport Access Road Improvements	Z62171 0000	303881	FHWA assignable	No	No Historic Properties Adversely Affected	10/7/2020
<p>Road realignment; Relocation of an overhead electric power transmission line; Resurfacing of the roadway with 9-inches of crushed surface course and minor shifting of the existing road so that it is entirely within the DOT&amp;PF right of way. Resurfacing of the roadway; Relocating a portion of the existing underground utilities from the east side of the road to the west side to follow the road realignment. This work will involve trenching, 2 – 4 feet beyond the new toe-of-slope. Installation of junction boxes in support of the underground utility relocation. A staging area is proposed on the east side of the Airport Access Road; material for the project is expected to come from the Doyon, Limited-owned 4.5 Mile Quarry.</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
Shageluk Airport Access Road Improvements	Z62171 0000	303881	FHWA assignable	No	No Historic Properties Adversely Affected	4/22/2021

This letter UPDATE increases the APE at the 4.5 Mile Quarry material site by approximately 25 acres. The increased APE remains within the boundary that Doyon, Limited obtained clearance for in 2012.

Fairbanks Cushman Street Bridge Rehabilitation	Z62207 0000	0663012	FHWA assignable	No	No Historic Properties Adversely Affected	8/3/2021
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This Update adds installation of decorative fencing along the street side, and wrapping around to the front, of the Immaculate Conception Church to the project description  
This Update also adds installation of new buried fiber optics cables to connect to upgraded traffic signals and extends the Project Area of Potential Effects (APE) to accommodate the fiber optics cable installation.

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Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
SGY State St. Pavement Rehabilitation	68085	0972018	FHWA assignable	No	No Historic Properties Adversely Affected	10/26/2020

The proposed project update would:

- Utilize temporary construction easements (TCE) and temporary construction permits (TCP) for temporary access and additional new improvements into existing elements such as driveways and sidewalks.
- Utilize permanent easements to resolve existing ROW encroachments, rehabilitate storm drain pipes, and construct sidewalk improvements for ADA accessibility.

SGY State St. Pavement Rehabilitation	68085	0972018	FHWA assignable	No	No Historic Properties Adversely Affected	8/3/2021
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This UPDATE expands the APE for project activities.



Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
<b>Hoonah: Harbor Way Pedestrian Improvements and Pitt Island Cemetery Walkway</b>	<b>SFHWHY 00278</b>	<b>0003255</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Adversely Affected</b>	<b>5/3/2021</b>
<p>Approximately 0.5 miles of walkway, including walkway turnarounds, will be built atop United States Army Corps of Engineers breakwater; an approximately 190-foot pedestrian bridge will be built from the shore to the breakwater; City and Borough of Juneau standards will be used to construct a 6-foot-wide concrete sidewalk with curbs on the City of Hoonah-owned Harbor Way; a thickened edge sidewalk will be built along the boat harbor parking area; minor drainage, pavement and pedestrian improvements, and utility adjustments along Harbor Way, repave, new signage and striping associated with the new facilities installation.</p>						
<b>Tongass Avenue Improvements</b>	<b>Z68091 0000</b>	<b>0902042</b>	<b>FHWA assignable</b>	<b>No</b>	<b>No Historic Properties Adversely Affected</b>	<b>8/27/2021</b>
<p>Update to project activities within original APE: Retaining wall footing repair for 25 ft along the seaward side of the roadway across from Nadeau Street. The retaining wall is located under a commercial building at 1935 Tongass Ave constructed on piles; Illumination at pedestrian crossings to increase visibility; Shifted Bus Pullout 300 in same parking lot; Replacement of existing traffic signal poles; Driveway to be removed at 1928 Tongass Ave, access would be maintained through adjacent property; Associated Temporary construction easements (TCEs).</p>						

Project Name	AKSAS	Federal Project #	Project Type	Qualifies for Programmatic Allowance?	Project Finding	Finding Letter Date
Sawmill Creek Road Resurfacing and Pedestrian Improvements	Z68100000	0933042	FHWA assignable	No	No Historic Properties Adversely Affected	8/23/2021

This is an update to revise the project APE; additional proposed items accounting for easements for sidewalk, driveway and walkway modifications, as well as the installation of cross-walk lighting at multiple locations both existing and new. Bring new and existing bus stops to ADA specification by acquiring minor areas of ROW to enhance access and install compliant pedestrian sidewalks and bus stops. Bike lanes will be added to both sides of the street. Lighting would be installed at new and existing crosswalks. LED-enhanced border lighting to school zone crossing signs.

## **Appendix 2: Program Monitoring -- Project Review**

May 12, 2022

## 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, 2020, through the end of the federal fiscal year on September 30, 2021.

## 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 last year's FFY20 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 was typically achieved in the range of 10-15% of the year's total Section 106 actions. The FFY21 assessment takes a similar approach, with particular focus on the improvement topics identified in previous years.

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 FFY21, reviewers used the same checklists employed during FFY20, with a focus on general assessments of file completeness and conformity to the PA.

Twenty-five projects were selected for monitoring review. The number of completed Section 106 actions in FFY21 was down once again from previous years, as ongoing disruptions from the pandemic affected some projects in development. SEO opted to perform a review with similar coverage in raw numbers. The number chosen for review reflects approximately 28% coverage of the total Section 106 findings and streamlined reviews processed during the reporting period. The review set consisted of 15 streamlined review projects: five in Central Region (CR), five from Northern Region (NR), four from Southcoast Region (SR), and one from SEO<sup>1</sup> as well as 10 standard consultations: three from CR, four from NR, and three from SR. 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 Cultural Resources Manager (CRM) and an SEO NEPA manager/archaeologist reviewed all of

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<sup>1</sup> The SEO processed two projects during the reporting year, one of which was included in the review set.

the selected projects.<sup>2</sup> Region PQIs were also invited to conduct reviews of other regions' projects, for additional perspective and peer information sharing; however, no region PQIs were able to participate in the review due to time constraints. Since that has been a consistent trend, this year NEPA managers for each region also participated in the reviews for their regions. SEO CRM staff compiled the review results. The SEO CRM 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 fifteen streamlined projects selected for review, four were Tier 1 and the remainder were Tier 2. Five 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

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<sup>2</sup> 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.

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.

### **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. This year, one reviewed project (from a new PQI) needed to add a map to the file; all others were complete.

### **3.2 Tier 1 Projects: Documentation Supports Tier 1 Classification<sup>3</sup>**

The proportion of streamlined reviews that consist solely of Tier 1 projects has remained consistently modest, at about 20-30% of annual totals. Four of the reviewed projects 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.

*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**

SEO reviewed eleven Tier 2 forms. Ten of these projects had good descriptions or documentation of the APE. 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

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<sup>3</sup> 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). As noted in previous years, occasionally Tier 1 project documentation may be exceeding what was expected during PA development. SEO is not advising a change in practice for projects that include the additional information at PQI discretion, but would re-state for future file audits, that the level of documentation can be commensurate with the Tier type being processed.

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.

One project update used a complex engineering drawing to indicate where changes to the previously reviewed project APE were occurring, to account for temporary and permanent easements in an urban area. This was challenging to review and is not recommended as a best practice. Due to the lack of clarity, it became apparent during the program review that some of the APE was not clearly indicated with regard to the permanent easements. SEO will be following up with the region to clarify.

The review noted a streamlined review for a geotech investigation on a project which had an APE developed for its primary standard consultation, which was considerably larger than the APE for the geotech work. The geotech work was shown within the previously defined APE figures. It was clear from the documentation where the geotech was occurring in relation to the rest of the APE, but some inconsistency arose in the description and labeling.

*Recommendation:* APE definition continues to be a risk 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.

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.

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 GCs Were Considered for Tier 2 Projects**

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

In one instance, reviewers observed that a region had cited GC 4 with confusing language regarding a railroad bridge in the APE, but closer review indicated that the Federal Railroad Administration (FRA) Program Comment was applicable and should have been referenced instead in support of GC4. SEO will coordinate with the region to update the project file with the more accurate statement.

*Recommendation:* PQIs will continue to indicate how each of the Tier 2 GCs are met. SEO will review best practices for documenting GCs in refresher training, and will work with new PQIs on this topic.

### **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, although SEO did note some instances where extraneous information was included on Tier 2 projects which do not need HRA because they are not using any allowances that trigger this consideration. SEO noted regions becoming more comfortable with documenting this, and some best practices which will be shared with the other PQIs. 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.

### **3.6 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.

The reviews showed that PQIs are regularly considering and documenting access to drilling locations, a tier-specific condition, when applying the programmatic allowance.

Geotech projects accounted for 4% of the total projects processed during FFY21. Although the number of geotech reviews was down in FFY21, the streamlined review process continued to be an important tool. Of the four standalone geotech investigations processed, all qualified for streamlined review. Geotech projects accounted for 6% of all projects processed with programmatic allowances.

*Recommendation:* SEO will continue to track the use of streamlined reviews for geotech investigations.



## 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.

Ten sets of consultation letters were reviewed. Five of these had No Historic Properties Affected findings and five were connected with No Adverse Effect findings. Five of the reviewed sets were updates.

### 4.1 Letters Follow Currently Approved Templates<sup>4</sup>

#### *General*

SEO last updated consultation letter templates in August 2020. 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.

#### *Clear delineation of Area of Potential Effect (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 consultation letters*

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. One region brought on a new PQI during the reporting year, who is in the process of developing these contacts and relationships.

With regard to consultation letters, templates for initiating consultation with tribes includes language requesting consultation on places of traditional religious and cultural importance. Additionally, 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. The review noted a small number of projects in two regions where newer PQIs had not used the tribally-specific language; this has since been rectified.

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

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<sup>4</sup> 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/desenviron/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.

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.

*Recommendation:*

SEO continues to re-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 emphasize this topic in the annual 106 PA refresher training, and at upcoming CRT meetings. 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*

In two instances, a local city government was omitted from the letter set. One of these cases involved the city government as a co-sponsor of the project. The reason for the other omission was not clear. Another project for minor area-wide maintenance and operations on bridges was originally handled via streamlined review. A letter consultation followed with SHPO to address additional bridges that exceeded the parameters of the streamlined review. The SEO CRM conducted additional training with the PQI. One other project which was undergoing a modest update omitted one of the ANCSA corporations that had previously been included, due to an oversight.

*Recommendation:* PQIs should continue to ensure that Section 106 letters are provided to all pertinent consulting parties, including projects which shift from streamlined reviews to full consultations. SEO will clarify practice when a local government is a project co-sponsor and share with the CRT.

*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). Other coordination with SHPO as the Official with Jurisdiction (OWJ) for 4(f) resources is typically handled separately from the Section 106 consultation. 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.

Under the NEPA Assignment program, SEO NEPA Managers determine the applicability of Section 4(f) to a project and ensure compliance with its requirements. Since Section 4(f) applicability varies according to a particular project's circumstances, some projects will require Section 4(f) coordination with the SHPO as OWJ and others will not. As such, project environmental analysts and/or the PQI should coordinate with the NEPA Manager to determine whether the Section 4(f) language in the Section 106 findings letter templates is needed for their project. One of the reviewed projects had sent the Section 106 findings prior to this coordination. During the Section 106 virtual training in November 2021, SEO worked with the instructor to emphasize the importance of this communication. Section 4(f) specific training was held in February 2022 where the NEPA manager-PQI coordination was also discussed.

SEO did note one project whose findings letters to other consulting parties incorrectly contained other SHPO-specific language; these were cut and paste errors. SEO reviewed this topic with the CRT.

*Recommendations:*

PQIs and environmental analysts should work together to coordinate Section 4(f) applicability with the appropriate NEPA Manager before finalizing findings letters. PQIs should also review consulting party letters to ensure that letter contents correlate to the recipients. The most recent update to the template instructions re-emphasized these topics.

## **4.2 Letter Enclosures on File**

The reviewed projects had complete enclosure sets on file. Reviewers noted that one group of letters in the review set was not signed with a digital signature, although the letters did contain the PQI's name in the signature block, and had been officially transmitted to consulting parties via PQI email. SEO has discussed with the PQI.

While this review did not explicitly address the content of survey report enclosures, since it is not a 106 PA compliance topic, PQIs consistently indicate that survey report review continues to be a substantial time-consuming task.

*Recommendation:* PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record.

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

Of the ten letter packages reviewed, one was 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. One project had a letter serving as an update to a streamlined review, in this case the letter was sent without a direct to findings form. The PQI has since been informed of protocols.

## **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. 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 NRHP eligibility of individual roads. The Methodology begins with a screening step to place a road into one of two categories. Category 1 roads are determined up front as not individually eligible for the NRHP based on this screening. Category 2 roads continue with further evaluation steps to consider historic significance and ultimately integrity.

Appendix J also includes a section, Section V, which delineates transitional processes including a transitional allowance for projects in development at the time of the historic roads transition.

The transitional allowance allows certain projects to continue to use the Interim Guidance<sup>5</sup>, upon approval from the Statewide Environmental Program Manager. No issues were observed during project review.

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.

*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.

#### **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 at this time.

#### **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.<sup>6</sup> Under NEPA Assignment, all FAHP projects are presently assigned.<sup>7</sup>

The program review also noted two instances where survey report enclosures were lacking the MOU language on the cover page. One project's consultant report was missing the language on the cover page; that project also had two consultant survey memos that were intended for internal notification, and likewise did not mention the language. Another project had a report prepared by the National Park Service for cultural resources on its land. Based on a close read of the MOU requirement, SEO believes that since these were submitted to all parties in conjunction with correspondence that clearly stated the assignment status, there is no MOU compliance concern.

*Recommendation:*

PQIs should continue to ensure the MOU assignment language is present on all report covers, regardless of internal or external authorship. During the reporting year, the Statewide NEPA Assignment Program Manager sent guidance to all regions (January 8, 2021) which outlined when the language must be used on DOT&PF documentation. This guidance is also posted on the historic properties website to make it more accessible to consultants. SEO has also reminded the CRT to verify that language is included in letters before they are sent out.

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<sup>5</sup> Interim Guidance for Addressing Alaska Historic Roads under the 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.*

<sup>6</sup> 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 November 3, 2017, and executed by FHWA and DOT&PF."

<sup>7</sup> The NEPA Assignment MOU (dated November 3, 2017), went into effect November 13, 2017. A small group of sub-programs and projects were excluded from assignment at that time, as designated in the MOU's Section 3.3.2. These have subsequently been included in the assignment program, as of August 20, 2020.

#### **4.7 Miscellaneous Topics**

One PQI has worked with their REM to develop a new communication tool to systematically gather clear and up-to-date information for PQI to use in preparing Section 106 documentation.

#### **5.0 Results: Project Updates**

There were ten updates of previous reviews or consultations in the review set. Five were processed via streamlined review, and five 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.

Two of the streamlined review forms would have benefitted from more clarity regarding what had changed since the previous review; otherwise, no issues were observed in the review set. Reviewers also noted two particular forms which provided strong examples of clarity in figures and text regarding project changes, which can be used for future training. 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.

Only one issue was observed in the review set. In one instance, a region conducted two processes for the same project—a streamlined review form and a separate findings letter. This appears to have been the result of a communication gap between the project team and PQI. This project would have been more aptly conducted as a streamlined review with a subsequent findings letter processed as an update and including the entire project. SEO has spoken to the regional PQI and this is not anticipated to occur again in the future.

Updates which are processed as standard consultations fall into two types: 1) updates where the project had changed, and 2) updates when 5 years or more had 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. Efforts to make this clear for all consulting parties were evident.

The review set also included one project update which contained information on project changes and also a state project number adjustment. This letter clearly explained what had changed since the original consultation, and explained the state number adjustment, thus avoiding unnecessary confusion.

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.

*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 update forms 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. 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. The 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; and generally strong file documentation.

Key recommendations from the FFY21 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 Tier 2 APEs and assess whether projects qualify for Tier 2.
- Tier 2 General Conditions should continue to be individually acknowledged in the Tier 2 processing package. Any 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.

- 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.

#### *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.
- Recordkeeping: PQIs should continue to review enclosures and figures for clarity, since these are part of the compliance record. 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 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 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.

The 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 2021

**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 2021

Project:

Reviewer:

Please check for final versions of documentation, with signatures where appropriate. **Steps that occurred prior to the reporting period (Oct 1, 2020-Sept 30, 2021) are not covered by this review.**

<b>General Consultation and Documentation (all reviews)</b>	<b>Y</b>	<b>N</b>	<b>U</b>	<b>N/A</b>	<b>Comments</b>
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.

## CRT Review Checklist for 106 PA Appendix D Consultation Projects, FFY 2021

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"/>	
If App J Transitional Allowance was used, approval email from SEPM is on file	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Confidentiality guidelines (pp 3-4) 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*

<b>Add'l for project updates:</b>	<b>Y</b>	<b>N</b>	<b>U</b>	<b>N/A</b>	<b>Comments</b>
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"/>	

<b>Add'l for adverse effect projects:</b>	<b>Y</b>	<b>N</b>	<b>U</b>	<b>N/A</b>	<b>Comments</b>
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"/>	

## CRT Review Checklist for 106 PA Appendix D Consultation Projects, FFY 2021

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"/>	
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**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.)*