

**APPENDIX G**  
ALASKA STATE HISTORIC PRESERVATION  
OFFICE CORRESPONDENCE AND SECTION 106  
NATIONAL HISTORIC PRESERVATION ACT  
PROGRAMMATIC AGREEMENT



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Natural Resources**

DIVISION OF PARKS & OUTDOOR RECREATION  
Office of History & Archaeology

550 West 7<sup>th</sup> Avenue, Suite 1310  
Anchorage, AK 99501-3561  
907.269 8700  
<http://dnr.alaska.gov/parks/oha>

August 22, 2019

File No.: 3130-1R COE-R/2019-00439

Andrew Gray  
USACE, Alaska District  
44669 Sterling Highway, Suite B  
Soldotna, Alaska 99669-7915

SUBJECT: POA-2019-00021, Gulf of Alaska, GCI Communication Fiber Optic Cable Project

Dear Mr. Gray:

The Alaska State Historic Preservation Office (AK SHPO) received your request for review on July 23, 2019. Based on the documentation provided, we are unable to concur with the proposed finding of effect at this time. We offer the following comments:

The correspondence indicates that identification is incomplete for the marine portion of the project, and that USACE proposes to phase identification for the project as a condition of the finding of effect. This would not include a review by SHPO or other consulting parties to determine adequacy of the data or proposed avoidance zones. In addition, there are several terrestrial project areas that have not had an archaeological survey to verify environmental conditions and site boundaries. If an archaeological survey cannot be conducted, we recommend that an archaeological monitor is present during construction at the proposed locations considered to have a higher probability for encountering archaeological resources. At this time, these include: Chignik Lake, False Pass, and Akutan. Further information may expand or reduce this list.

We believe a Programmatic Agreement (PA) is appropriate for this project. For the following reasons:

1. Phased identification is allowable under the 36 CFR 800 regulations, but only prior to assessing effect or with the use of an alternative agreement such as a Programmatic Agreement (36 CFR 800.4[b][2]).
2. Use of a PA would capture the specifics on where archaeological monitoring is required, a monitoring plan, and inadvertent discovery protocol during the project.
3. Use of a PA would allow for more flexibility if there was a need for route alterations, or adverse effects are determined to not be able to be avoided during the project.

As stipulated in *36 CFR § 800.3*, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations.

Thank you for the opportunity to comment and review. Please contact McKenzie S. Johnson at [mckenzie.johnson@alaska.gov](mailto:mckenzie.johnson@alaska.gov) or 907-269-8726 if there are any questions.

Judith E. Bittner

A handwritten signature in blue ink that reads "Judith E. Bittner".

State Historic Preservation Officer

JEB: msj

**From:** [Johnson, McKenzie S \(DNR\)](#)  
**To:** [Gray, Andrew A CIV USARMY CEPOA \(USA\)](#); [Clemens, Janet](#)  
**Cc:** [Jennifer PEDERSON WEINBERGER](#); [Emily Creely](#); [Lucy Flynn O'Quinn](#)  
**Subject:** RE: [Non-DoD Source] Re: POA-2019-00021 Gulf of Alaska, GCI, Fiber Optic Cable - 106 initiation; NPS response  
**Date:** Thursday, August 22, 2019 3:48:18 PM  
**Attachments:** [8-22-19 POA-2019-00021 Gulf of Alaska GCI FOC.pdf](#)

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Hello Andy et al., please see the attached comments regarding the proposed project. Thank you.

--Mckenzie Johnson, AK SHPO/OHA

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**From:** Gray, Andrew A CIV USARMY CEPOA (USA) <[Andrew.A.Gray@usace.army.mil](mailto:Andrew.A.Gray@usace.army.mil)>  
**Sent:** Tuesday, August 20, 2019 9:15 AM  
**To:** Clemens, Janet <[janet\\_clemens@nps.gov](mailto:janet_clemens@nps.gov)>  
**Cc:** Meitl, Sarah J (DNR) <[sarah.meitl@alaska.gov](mailto:sarah.meitl@alaska.gov)>; Johnson, McKenzie S (DNR) <[mckenzie.johnson@alaska.gov](mailto:mckenzie.johnson@alaska.gov)>; Jennifer PEDERSON WEINBERGER <[jennifer\\_pederson@nps.gov](mailto:jennifer_pederson@nps.gov)>; Emily Creely <[ecreely@dowl.com](mailto:ecreely@dowl.com)>; Lucy Flynn O'Quinn <[loquinn@dowl.com](mailto:loquinn@dowl.com)>  
**Subject:** RE: [Non-DoD Source] Re: POA-2019-00021 Gulf of Alaska, GCI, Fiber Optic Cable - 106 initiation; NPS response

Good morning Janet,

I reached out the agent for the project and they have drafted responses to your questions in the attached word document. Please let me know if your questions/comments were adequately addressed.

Andy Gray  
Regulatory Division, Alaska District  
Kenai Field Office  
(907)753-2722

**From:** Clemens, Janet [[mailto:janet\\_clemens@nps.gov](mailto:janet_clemens@nps.gov)]  
**Sent:** Friday, August 16, 2019 3:21 PM  
**To:** Gray, Andrew A CIV USARMY CEPOA (USA) <[Andrew.A.Gray@usace.army.mil](mailto:Andrew.A.Gray@usace.army.mil)>  
**Cc:** Meitl, Sarah J (DNR) <[sarah.meitl@alaska.gov](mailto:sarah.meitl@alaska.gov)>; Johnson, McKenzie S (DNR) <[mckenzie.johnson@alaska.gov](mailto:mckenzie.johnson@alaska.gov)>; Jennifer PEDERSON WEINBERGER <[jennifer\\_pederson@nps.gov](mailto:jennifer_pederson@nps.gov)>  
**Subject:** [Non-DoD Source] Re: POA-2019-00021 Gulf of Alaska, GCI, Fiber Optic Cable - 106 initiation; NPS response

Hi Andy,

Thank you for providing information for the initial Section 106 consultation for the proposed Gulf of Alaska, GCI, Fiber Optic Cable project. We do have a couple of questions/comments, as related to the project activity that will take place within the Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army (Dutch Harbor WWII) National Historic Landmark (NHL):

Will all of the proposed fiber optic cable trench on Unalaska (from beach to communication shelter) take place within previously developed roadbed (to the extent of the proposed trench height, width and depth)?

Along this same route, we are interested in seeing information that identifies the built environment (above ground) such as WWII structures and/or sites (i.e. could be former building foundations).

We are also interested in seeing information that will address the new communication shelter, as it will also be located within the WWII NHL. We'd like to understand its location in relation to other WWII properties, and other characteristics of the WWII setting, including the viewshed.

And just to add a clarification, while most of Amaknak Island is within the Dutch Harbor WWII NHL, the Aleutian WWII National Historic Area, which is also the US Army Fort Schwatka footprint boundaries, is limited to the top of Mt. Ballyhoo.

Looking forward to hearing more about the project.

Thank you,

Janet

Janet Clemens, Historian/Regional 106 Coordinator  
National Park Service  
Alaska Region  
240 W. 5th Avenue  
Anchorage, AK 99501  
t. 907/644-3461  
f. 907/644-3811

On Tue, Jul 23, 2019 at 10:11 AM Gray, Andrew A CIV USARMY CEPOA (USA) <[Andrew.A.Gray@usace.army.mil](mailto:Andrew.A.Gray@usace.army.mil)> wrote:

Please see the attached letter.

I will be the point of contact for consultation, please don't hesitate to contact me with any questions.

Andy Gray  
Regulatory Division, Alaska District  
Kenai Field Office  
(907)753-2722



Preserving America's Heritage

October 30, 2019

Mr. Andrew Gray  
U.S. Army Corps of Engineers  
Alaska District  
Regulatory Division  
44669 Sterling Highway, Suite B  
Soldotna, AK 99669

Ref: *GCI Fiber Optic Cable Installation below the Mean High Water (MHW) in the Gulf of Alaska  
Kodiak Island, Alaska  
POA-2019-00021  
ACHPConnect Log Number: 14646*

Dear Mr. Gray:

The Advisory Council on Historic Preservation (ACHP) has received your notification of adverse effect for the referenced undertaking that was submitted in accordance with Section 800.6(a)(1) of our regulations, "Protection of Historic Properties" (36 CFR Part 800). The background documentation included with your submission does not meet the specifications in Section 800.11(e) of the ACHP's regulations. We, therefore, are unable to determine whether Appendix A of the regulations, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, applies to this undertaking. Accordingly, we request that you submit the following additional information so that we can determine whether our participation in the consultation to resolve adverse effects is warranted.

- Copies or summaries of any views provided by consulting parties, the public, and the Alaska State Historic Preservation Officer; and
- Copies or summaries of any views or comments provided by any affected Indian tribe.

Upon receipt of the additional information, we will notify you within 15 days of our decision.

If you have any questions, please contact Mr. Anthony Guy Lopez at 202-517-0220 or via e-mail at [alopez@achp.gov](mailto:alopez@achp.gov).

Sincerely,

LaShavio Johnson  
Historic Preservation Technician  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1 **PROGRAMMATIC AGREEMENT**

2 **BY AND AMONG THE**

3 **UNITED STATES DEPARTMENT OF AGRICULTURE, RURAL UTILITIES**

4 **SERVICE,**

5 **UNITED STATES ARMY CORPS OF ENGINEERS, AND**

6 **ALASKA STATE HISTORIC PRESERVATION OFFICER**

7 **REGARDING THE**

8 **AU-ALEUTIAN FIBER-OPTIC PROJECT, ALASKA**

9 **WHEREAS**, the U.S. Department of Agriculture (USDA), Rural Utilities Service (RUS) administers grant  
10 programs that provide much-needed infrastructure or infrastructure improvements to rural communities, in  
11 the areas of water and wastewater, electric power, and telecommunication services, which play a critical  
12 role in helping to expand economic opportunities and improve the quality of life for rural residents; and

13 **WHEREAS**, on October 13, 2020, RUS announced the agency had awarded a grant to Unicom,  
14 Incorporated (Unicom) under the ReConnect Program for Unicom’s AU-Aleutians Fiber-Optic Project  
15 (Unicom Project); and

16 **WHEREAS**, the proposed Unicom Project consists of the installation of approximately 848 miles of  
17 submarine fiber-optic cable originating from an existing Unicom network connection in Kodiak and  
18 approximately 49 miles of associated terrestrial installations to homes and businesses in the communities of  
19 Larsen Bay, Chignik, Sand Point, King Cove, Akutan, and Unalaska (Attachment A); and

20 **WHEREAS**, RUS has determined that the obligation of federal financial assistance would make this project  
21 an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54  
22 U.S.C. 306108, and its implementing regulations, “Protection of Historic Properties” (36 CFR Part 800); and

23 **WHEREAS**, the Section 106 consultation process is run concurrently with RUS reviews conducted under 7  
24 CFR 1970, Environmental Policies and Procedures. Rural Development’s National Environmental Policy  
25 Act (NEPA) implement procedures; use of the provisions under this agreement must be documented as part  
26 of the NEPA process and, if necessary, included as part of the findings of significance, and included as  
27 mitigation measures and project conditions in final decision-making under NEPA; and

28 **WHEREAS**, the U.S. Army Corps of Engineers, Alaska District (the Corps), is responsible for authorizing  
29 work which requires review under Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of  
30 the Clean Water Act (either through individual permits or through the Corps Nationwide Permit Program);  
31 and

32 **WHEREAS**, Unicom anticipates that the Unicom Project will require the submittal of a permit application  
33 to the Corps under Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water  
34 Act; and

35 **WHEREAS**, on March 31, 2021, RUS notified the State Historic Preservation Officer (SHPO) that RUS  
36 will act as the lead federal agency pursuant to 36 CFR 800.2(a)(2); and

37 **WHEREAS**, RUS, in consultation with the SHPO established the proposed project’s area of potential  
38 effects (APE) for marine, intertidal, and terrestrial construction activities (Attachment B); and

39 **WHEREAS**, as of April 2021, the Alaska Heritage Resources Survey (AHRS) database<sup>1</sup> lists 79 cultural  
40 properties located within or which intersect the APE; of these properties, seven have been determined  
41 eligible for listing in the National Register of Historic Places (NRHP), two are National Historic Landmarks  
42 (NHL), three are contributing properties to the NHL, two have been determined not eligible for listing in  
43 the NRHP, and the remaining 65 properties have not been evaluated for their eligibility for listing in the  
44 NRHP; and

45 **WHEREAS**, for the purposes of Section 106 compliance, RUS is treating any of the AHRS sites in the  
46 APE listed in the preceding recital which have not been formally evaluated for their NRHP eligibility as  
47 eligible for inclusion in the NRHP; and

48 **WHEREAS**, the remote and rural location of the communities has resulted in very little information  
49 regarding the nature, location, distribution, and horizontal and vertical extents of cultural resource sites  
50 within the APE of the Project; and

51 **WHEREAS**, in accordance with 36 CFR § 800.14(b)(1)(ii), RUS has determined that execution of a  
52 Programmatic Agreement (PA) is appropriate for this undertaking because effects on historic properties  
53 cannot be fully determined prior to the obligation of funding for the project; and

54 **WHEREAS**, RUS has determined that the proposed project may have an adverse effect to historic  
55 properties<sup>2</sup> within the APE; and

56 **WHEREAS**, the SHPO has participated in the development of this PA pursuant to 36 CFR 800.14(b) and  
57 is a Signatory to this PA; and

58 **WHEREAS**, RUS notified the Advisory Council on Historic Preservation (ACHP) on March 26, 2021  
59 regarding the development of this PA, and the ACHP has declined to participate in the development of this  
60 PA; and

61 **WHEREAS**, the National Park Service (NPS) has participated in consultation and in the development of  
62 this PA regarding potential Project effects to historic properties within the Dutch Harbor Naval Operating  
63 Base and Fort Mears, U.S. Army NHL, and has been invited to sign as a Concurring Party; and

64 **WHEREAS**, RUS has consulted with Unicom during the development of this PA pursuant to 36 CFR  
65 800.2(c)(4), and Unicom has agreed to carry out Stipulations in this PA and is an Invited Signatory; and

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<sup>1</sup> The AHRS database is maintained by the Alaska Office of History and Archaeology, and includes buildings, objects, structures, archaeological and historic sites, districts, shipwrecks, travel ways, traditional cultural properties, landscapes, and other places of cultural importance.

<sup>2</sup> The term “historic properties” is consistent with 36 CFR 800.16(l)(1) and is defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). This includes artifacts, records, and remains that are related to and located within such properties, and includes properties of traditional religious or cultural importance to Tribes or other entities, and that meet the NRHP criteria.

66 **WHEREAS**, RUS recognizes that the Federal Government has a unique legal relationship with Tribes<sup>3</sup> set  
67 forth in the U.S. Constitution, and that the implementing regulations of Section 106 require RUS to consult  
68 with Tribes so that they may identify concerns about historic properties, advise on the identification and  
69 evaluation of historic properties of traditional religious, spiritual, or cultural importance, articulate their  
70 views on the proposed Project’s effects on such properties, and to participate in the resolution of adverse  
71 effects, pursuant to 36 CFR 800.2(c)(2)(ii); and

72 **WHEREAS**, RUS and the Corps have made a good faith effort to consult with Tribes to participate in the  
73 development of this PA (see Attachment C); and

74 **WHEREAS**, RUS and the Corps have made a good faith effort to consult with local governments and other  
75 interested parties to participate in the development of this PA pursuant to 36 CFR 800.2(c)(3) and 36 CFR  
76 800.2(c)(5) (see Attachment C); and

77 **WHEREAS**, the Alutiiq Museum and Archaeological Repository has participated in development of this  
78 agreement and may sign as an Concurring Party; and

79 **WHEREAS**, RUS’ inventory efforts and consultation have determined that a majority of the APE consists  
80 of conditions which are impractical to investigate using standard archaeological methods due to the current  
81 infrastructure conditions within the community (e.g., disturbed areas, archaeological deposits beneath  
82 existing roadways) and the nature of the proposed Project (e.g., linear trenching); and

83 **WHEREAS**, RUS’ inventory efforts and consultation have determined that the lack of detailed information  
84 regarding the horizontal and vertical extents of known archaeological deposits present challenges in  
85 establishing definitive avoidance measures that would eliminate the potential for adverse effects and/or  
86 inadvertent discoveries; and

87 **WHEREAS**, RUS’ inventory efforts and consultation have determined that a majority of the APE is  
88 considered high potential for containing unknown or undocumented archaeological properties which may  
89 be affected by the proposed project; and

90 **WHEREAS**, RUS has considered and accounted for potential adverse effects to known and unknown  
91 properties which may be eligible for the NRHP as a result of the undertaking and has assembled measures  
92 to minimize or mitigate these potential effects and assembled these strategies in the attached Cultural  
93 Resources Monitoring Plan (CRMP) (Attachment E).

94 **NOW THEREFORE**, RUS, the Corps, SHPO, and Unicom (collectively “the Signatories”), agree that the  
95 proposed Project shall be implemented in accordance with the following stipulations in order to take into  
96 account the effect of the Project on historic properties.

#### 97 **STIPULATIONS**

98 RUS shall ensure that the following stipulations are carried out:

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<sup>3</sup> Throughout this document, the term “Tribe” or “Tribes” is consistent with the definition found at 36 CFR 800.16(m) and refers to a tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, formed pursuant to Section 3 of the Alaska Native Claims Settlement Act (43 USC 1602).

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## **I. STANDARDS**

- A.** RUS shall ensure that all work carried out pursuant to this agreement meets the Secretary of the Interior’s (SOI) Standards and Guidelines for Archaeology and Historic Preservation (48 Federal Register [FR] 44716, September 29, 1983).
- B.** RUS shall ensure that all work carried out pursuant to this agreement shall be done by or under the direct supervision of professionals who meet the SOI Professional Qualifications Standards for Historic Preservation (62 FR 33708, June 20, 1997). RUS and Unicom shall ensure that consultants retained for services pursuant to the agreement meet these standards.

## **II. ADMINISTRATIVE STIPULATIONS**

- A.** The terms of this PA shall apply to the Project and all of its Phases including any future design and APE changes not specified in the current permits, permit applications, or other project documents.
- i. Unicom will be responsible for submitting any subsequent modifications for review see Stipulation V: *Cultural Resource Inventory Efforts*.
- ii. RUS, in consultation with the other Signatories, may reevaluate the APE annually, should additional or new information on the Project became available based on engineering design changes, revised information regarding environmental impacts, or other reasons deemed appropriate.
- B.** The terms of this PA may be applied to any branch lines extended from the main subsea fiber optic cable to additional communities not originally part of the project provided that the PA has not expired.
- C.** All references to “days” in this PA shall refer to calendar days, unless specifically identified as “business days.”
- D.** RUS, the Corps, and SHPO shall enforce the terms of this PA within each agency’s scope and shall incorporate this PA and its terms into any decision document, permit, or authorization they issue. Each agency shall notify the others within 20 days if any of them becomes aware of an instance of possible non-compliance with the terms and conditions of this PA, or permit conditions as they relate to this PA. In such cases, RUS, as the lead federal agency, shall ensure that compliance is consistent with its legal authorities and will consult with the other PA Signatories, as needed.
- E.** The PA Signatories recognize that certain information about historic properties or archaeological resources is protected from public disclosure under NHPA (54 USC 307103), the Archaeological Resources Protection Act (ARPA; 43 CFR 7.18), and Alaska state law (as required by Public Law 96-95, AS 40.25.120(a)(4), and Policy and Procedure No. 50200. RUS and SHPO shall ensure that all actions and documentation prescribed by this PA are consistent with the non-disclosure requirements of these laws.
- F.** Any of the PA Signatories may seek qualified independent expert consultation, through a third-party contractor, in order to fulfill the responsibilities under this PA, provided the contractor meets requirements listed above in Stipulation I: *Standards*.
- G.** Signatories and concurring parties to the agreement shall provide contact information for this PA to RUS. It is the responsibility of each Signatory and concurring party to immediately notify RUS of any change in name, mailing address, e-mail address, or phone number for any

- 141 concurring party. Once received, RUS will forward this information to all Signatories and  
 142 concurring parties by e-mail or mail within five (5) business days, and will update the PA  
 143 record of current contact names, organizations, and email addresses for Signatories and  
 144 concurring parties for the PA.
- 145 **H.** Email shall be an acceptable form of communication between the Consulting Parties<sup>4</sup> and is  
 146 an appropriate method of “notification” or “in writing” where it is called for in this PA, unless  
 147 otherwise described. If a Consulting Party does not have access to email or consistently  
 148 available internet service, then RUS will ensure that other forms of communication are  
 149 pursued.
- 150 **I.** At any time prior to the end of any review period or submittal date associated with this PA,  
 151 Signatories to this PA may request additional time for reviews of documentation, preparation  
 152 of guidance documents or submittals, or any other time-sensitive materials outlined in this  
 153 PA by submitting their request in writing to RUS.
- 154 **J.** At any time throughout the life of the PA, any outside entity not initially part of this PA,  
 155 including Tribes, may contact RUS and request to become a Consulting Party. RUS will  
 156 consider any such request and notify the Signatories and other Consulting Parties of the  
 157 request and RUS’ decision. Consulting parties added under this stipulation will be included  
 158 in any and all distributions of reports, notices, or other activities outlined in this PA.
- 159 **K.** In the event that another federal agency, not initially a party to this PA, receives an application  
 160 for funding/license/permit for the Project as described in this PA, that agency may fulfill its  
 161 Section 106 responsibilities by stating in writing that it concurs with the terms of this PA and  
 162 notifying the Signatories that it intends to do so. Such agreement shall be evidenced by  
 163 execution of a Signature Page and filing with the ACHP, and implementation of the terms of  
 164 this PA.
- 165 **L.** The Signatories may execute this PA in counterparts, with a separate page for each signatory.  
 166 RUS will distribute copies of all pages to all Consulting Parties once the PA is signed.

### 167 **III. AGENCY ROLES AND RESPONSIBILITIES**

- 168 **A.** RUS shall attach this PA or its stipulations to any agency-specific financing or authorizations,  
 169 so long as the underlying PA remains in effect for the area covered by the relevant financing  
 170 or authorizations. Those agencies shall ensure that requirements of this PA have been met for  
 171 that part of the Project under their respective jurisdictions. Failure on the part of Unicom to  
 172 comply with the PA stipulations could result in suspension, modification, or revocation of the  
 173 applicable agency’s financing or authorizations.
- 174 **B.** RUS, the Corps, and SHPO shall consult annually to ensure that each agency independently  
 175 satisfies its respective regulatory requirements under 36 CFR 800. If any PA Signatory does  
 176 not comply with the PA stipulations, RUS shall implement the procedures outlined in  
 177 Stipulation VI: Dispute Resolution.
- 178 **C.** RUS will protect information about historic properties to the extent allowed by Section 304  
 179 of the NHPA (54 USC 470), 36 CFR 800.11(c), and other applicable laws and regulations.  
 180 Section 304 requires consultation with the ACHP and Keeper of the NRHP. Under the  
 181 provisions of ARPA (54 USC 470hh) and NHPA, site location information is restricted in

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<sup>4</sup> “Consulting Parties” includes all Signatories and parties invited to consult on the development to this agreement.

182 distribution; disclosure of such information may be exempt from requests under federal and  
183 state freedom of information laws. RUS is responsible for returning information to Tribes and  
184 for determining acceptable methods of information distribution.

185 **D.** The SHPO will receive all technical reports and will retain location information about all  
186 cultural resources and historic properties, including properties of religious, spiritual, or  
187 cultural significance to Tribes identified during the Project. This approach is keeping with its  
188 mission to identify and maintain inventories of cultural resources and historic properties  
189 [Section 101 of NHPA (54 USC 302301) and AS 41.35.070(a)].

190 **IV. UNICOM RESPONSIBILITIES**

191 **A.** If the Project is permitted, this PA and all of its requirements will be binding on Unicom, and  
192 its successors, heirs, and assigns. Unicom shall include a provision requiring compliance with  
193 the PA in any contract of sale or transfer of ownership or management of the Project.

194 **B.** Unicom shall be responsible for funding and implementing, either directly or through  
195 qualified consultants or contractors, the work necessary to ensure compliance with the terms  
196 of this PA. This work will be completed on behalf and at the direction of RUS.

197 **C.** Unicom shall ensure that any persons conducting or supervising cultural resources work on  
198 their behalf hold all appropriate federal or state permits and/or authorizations for that work,  
199 and meet Stipulation I: *Standards*, for the applicable discipline.

200 **D.** Unicom, and any contractors hired on their behalf, will not retain sensitive information that  
201 Tribes or Consulting Parties authorize them to collect, beyond the time needed to complete  
202 compliance with the terms of the PA. Sensitive information may include, but is not limited  
203 to, information about archaeological resources, sacred objects, features, artifacts, items of  
204 cultural patrimony, landscapes, or other types of information that have been determined by  
205 Tribes or Consulting Parties to be confidential and not for public disclosure.

206 **V. CULTURAL RESOURCE INVENTORY EFFORTS**

207 **A.** Unicom will retain the services of a marine archaeologist meeting the criteria listed in  
208 Stipulation I. *Standards* who will conduct an evaluation of subsea mapping and geophysical  
209 remote-sensing survey for potential historic submerged cultural resources. Unicom will  
210 submit to RUS a report detailing the findings of this evaluation and any necessary  
211 documentation demonstrating how Unicom has modified the proposed marine FOC  
212 alignment to avoid identified cultural resources no later than 120 days prior to the  
213 commencement of marine construction activities.

214 **i.** RUS will distribute the report and associated documentation to Consulting Parties, who  
215 shall have 30 days to review and provide comments on the report and documentation to  
216 RUS. Upon receipt of timely comments, RUS may direct Unicom to make any appropriate  
217 changes or modifications to the proposed marine construction activities.

218 **ii.** Upon completion of any required changes, Unicom shall submit the final report and  
219 documentation to RUS and SHPO for a final 15-day review and approval period.

220 **iii.** Upon approval of the report and documentation by RUS and SHPO, RUS will notify the  
221 Permittee that Section 106 obligations for the project phase are complete in accordance  
222 with Stipulation VI: *Initiation of Construction*

223 **B.** Unicom will retain qualified consultants to conduct archaeological monitoring during all  
224 intertidal and terrestrial construction activities associated with the Project in Larsen Bay,  
225

- 226 Chignik, Sand Point, King Cove, Akutan, and Unalaska, unless otherwise agreed to in  
227 advance under Stipulation V.C below. Monitoring activities will be guided by the protocols  
228 and procedures outlined in the attached Cultural Resources Management Plan (CRMP)  
229 (Attachment 5).
- 230 i. Archaeological monitors must meet the criteria established above in Stipulation I:  
231 *Standards*.
- 232 ii. RUS shall ensure that Unicom’s consultants obtain any necessary permits, authorizations,  
233 curation agreements, or any other necessary documentation required by the land manager  
234 or owner to conduct the monitoring of the construction activities.
- 235 iii. A comprehensive report of monitoring activities within each village location and will be  
236 submitted to RUS and SHPO for review and concurrence no later than 180 days following  
237 the conclusion of the monitoring activity. The report will include recommendations  
238 regarding NRHP eligibility of cultural resources encountered during the monitoring  
239 activity, as required. SHPO will have 30 days to provide comment regarding the report and  
240 eligibility recommendations provided, and RUS shall direct Unicom to make any necessary  
241 changes or revisions to the report before finalizing.
- 242
- 243 C. If, after execution of this PA, Unicom refines and finalizes the intertidal and terrestrial  
244 alignments of the fiber-optic cable within one or more of the communities, Unicom may retain  
245 a qualified consultant to develop detailed plans for the phased identification of historic  
246 properties and specific avoidance or minimization measures for those individual community  
247 locations which may reduce or minimize the need for on-site archaeological monitoring. Any  
248 such plans must be submitted to and approved by RUS and SHPO prior to implementation by  
249 Unicom’s consultant, and Unicom will be required to submit a report from their consultant  
250 describing the findings of the cultural resources identification activities and how Unicom will  
251 implement construction activities based on the results of fieldwork to RUS and SHPO for  
252 review and concurrence prior to RUS authorization for Unicom to commence terrestrial  
253 construction activities.
- 254 i. Any such cultural resources fieldwork plans developed by Unicom’s consultant shall  
255 include the following information (as appropriate):
- 256 a. detailed descriptions of the proposed project alignments within the community,  
257 including descriptions of the installation methods and landownership information;
- 258 b. detailed descriptions of known cultural properties within the community;
- 259 c. summaries of previous cultural resources survey efforts and results within the  
260 community;
- 261 d. proposed identification methods for specific project components (e.g., beach man  
262 holes [BMHs], vaults, HDD entry and exit points);
- 263 e. a schedule of proposed activities associated with the proposed plan, including  
264 fieldwork and plan reporting.
- 265 ii. RUS and SHPO review and approval of any such plans prepared by Unicom’s consultant  
266 shall occur according to the following schedule:
- 267 a. Unicom shall submit a proposed plan to RUS and SHPO containing the items  
268 listed in Stipulation V.C.i
- 269 b. RUS and SHPO shall have 30 days to review and comment on the proposed plan;
- 270 c. Unicom’s consultant shall address any necessary comments or questions, and  
271 resubmit the revised plan to RUS and SHPO within 15 days of receiving their  
272 comments;
- 273 d. RUS and SHPO shall review the revised plan within 30 days and either:

- 274 1. provide their written approval that Unicom’s consultant may implement the
- 275 plan; or
- 276 2. provide detailed comments that identify deficiencies in the plan that prevent
- 277 its approval and which Unicom must resolve prior to approval.
- 278 e. Upon approval of the plan by RUS and SHPO, Unicom’s consultant may
- 279 implement the plan, conduct the proposed fieldwork, and prepare and subsequent
- 280 reporting efforts to RUS and SHPO.
- 281 iii. After completion of fieldwork in accordance with the approved plan, Unicom’s consultant
- 282 shall prepare a report describing the implementation of the inventory plan, and submit this
- 283 report to RUS and SHPO from review and approval according to the following schedule:
- 284 a. Unicom’s consultant shall submit a report describing the methods and results or
- 285 findings of the implementation of the approved plan to RUS and SHPO within
- 286 180 days of the fieldwork activities. The report shall contain:
- 287 1. A summary of the fieldwork activities, duration, and findings
- 288 2. A list of cultural resource sites identified and/or investigated
- 289 3. Proposed avoidance strategies for known cultural resource sites for which
- 290 avoidance is being proposed
- 291 4. Descriptions of alignment revision recommendations or modifications to
- 292 construction techniques to avoid or minimize adverse effects
- 293 b. RUS and SHPO shall have 30 days to review and comment on the report.
- 294 c. Unicom shall address any necessary comments or questions and resubmit the
- 295 revised report to RUS and SHPO within 15 days of receiving their comments.
- 296 d. RUS and SHPO shall review the revised report within 14 days and either:
- 297 1. provide their written approval that the report and proposed construction
- 298 implementation adequately addresses potential adverse effects to historic
- 299 properties and Unicom may commence construction activities as outlined
- 300 within the report; or
- 301 2. provide detailed comments that identify deficiencies in the report and
- 302 proposed implementation that prevent its approval and which Unicom must
- 303 resolve prior to approval.
- 304 e. Upon approval of the report and implementation plan by RUS and SHPO, RUS
- 305 will notify Unicom in writing that they may implement the proposed construction
- 306 and any subsequent reporting efforts to RUS and SHPO, consistent with
- 307 Stipulation VI.B.i.

**VI. RESOLUTION OF ADVERSE EFFECTS**

- 308 **A.** In the event that RUS, in consultation with the SHPO, determines that an adverse effect has
- 309 or will occur and cannot be adequately minimized or avoided through other measures,
- 310 Unicom’s consultant will develop a mitigation measure consisting of a written treatment plan
- 311 within seven days.
- 312 i. In general, the following preferred mitigation measures which may be employed include,
- 313 but are not limited to:
- 314 a. Oral history interviews, place names studies, GIS mapping, development of
- 315 media, archival searches, and report preparation and publication (generally
- 316 associated with properties eligible under Criterion A or B);
- 317 b. Historic American Building Survey (HABS)/Historic American Engineering
- 318 Record (HAER)/Historic American Landscape Survey (HALS) documentation or
- 319 rehabilitation and reporting (generally associated with properties eligible under
- 320 Criterion C); and/or
- 321

- 322 c. Data recovery and analysis, reporting, and curation of resulting collections and
- 323 records (generally associated with properties eligible under Criterion D).
- 324 ii. To the extent practicable, the mitigation measure proposed should relate to the community
- 325 in which the adverse effect will occur.
- 326 **B.** Unicom’s consultant shall submit the Treatment plan to RUS and SHPO for a seven-day
- 327 review and approval period.
- 328 i. After seven days, RUS and SHPO shall provide comments to Unicom’s consultant, and
- 329 indicate if the proposed Treatment Plan adequately resolves the adverse effect, or if
- 330 additional information of modifications of the proposed Treatment Plan are required.
- 331 **C.** Upon approval of the Treatment Plan by RUS and SHPO, RUS will provide Unicom with
- 332 written notice that the plan may be implemented consistent with PA Stipulation VII.

**VII. INITIATION OF CONSTRUCTION AND STOP WORK ORDERS**

- 333 **A.** Unicom shall not initiate work within the marine APE of the Project until RUS provides
- 334 Unicom with written notice that pre-construction provisions of the PA and CRMP have been
- 335 met for the marine phase.
- 336 **B.** Upon execution of this PA and its attachments, Unicom may commence construction under
- 337 the supervision of an archaeological monitor(s) within the terrestrial and/or intertidal phases
- 338 of the Project, provided that Unicom, or contractors hired on their behalf have obtained any
- 339 and all necessary permits, authorizations, or agreements, consistent with Stipulation IV.C
- 340 above.
- 341 i. As described in Stipulation V.C above, Unicom may elect to develop detailed phased
- 342 identification plans for one or more communities after the execution of this PA in lieu of
- 343 immediately commencing construction activities. Consistent with Stipulation V.C above,
- 344 these plans and the results of their implementation must both be approved by RUS and
- 345 SHPO prior to Unicom commencing terrestrial construction activity.
- 346 **C.** Archaeological monitors working at locations of ground-disturbing activity associated with
- 347 the Project have the authority to issue stop-work orders to Unicom or contractors hired on
- 348 their behalf to allow for inspection of suspected cultural resources and/or human remains, and
- 349 to allow for any necessary notification or consultation as required by the terms of this PA and
- 350 attached CRMP.
- 351 **D.** In the event that an adverse effect determination has been made and a proposed Treatment
- 352 Plan developed in accordance with Stipulation VII, upon approval of the final Treatment Plan
- 353 by RUS and SHPO, RUS will notify Unicom in writing that the Treatment Plan may be
- 354 executed.
- 355

**VIII. ANNUAL MEETING**

- 356 **A.** No later than March 31 of each year, RUS shall invite and host a meeting of the Signatories
- 357 and Consulting Parties to discuss the previous year’s activities, and activities scheduled for
- 358 the upcoming year. The meeting shall be held virtually, or in Anchorage at the Alaska Office
- 359 of History and Archaeology, or at another location by consensus of the Signatories. The
- 360 parties may participate by virtual means if they so desire, and minutes of the meetings will
- 361 be distributed by the RUS within 30 days. The RUS shall amend the minutes as a result of
- 362 comments received within 15 days and distribute finalized minutes within 15 days.
- 363

**IX. DISPUTE RESOLUTION**

- 364 **A.** Should any PA Signatory object at any time to the manner in which the terms of this PA are
- 365 implemented, RUS shall consult with such party to resolve the objection. If RUS determines
- 366 that such objection cannot be resolved, RUS will:
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- i. Forward all documentation relevant to the dispute, including RUS' proposed resolution to the ACHP. The ACHP shall provide RUS with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, RUS shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, PA Signatories and Consulting Parties, and provide them with a copy of this written response. RUS will then proceed according to its final decision.
  - ii. If the ACHP does not provide its advice regarding the dispute within the 30-day time period, RUS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, RUS shall prepare a written response that takes into account any timely comments regarding the dispute from the PA Signatories and Consulting Parties to the PA and provide them and the ACHP with a copy of such written response.
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- B. RUS' responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

## 382 X. AMENDMENTS

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- A. Project design changes which result in changes to the APE, or additional potential for effects to historic properties will require that an Amendment to this PA be executed. Unicom will notify RUS in the event of a project design change which expands or reconfigures the APE, and RUS will consult with PA Signatories and Consulting Parties to amend the PA following the timeline and steps below.
  - B. The PA Signatories may request an amendment to the body of this PA by providing proposed changes in writing to RUS. RUS will notify all parties to this agreement of the proposed amendment and consult with them to reach agreement within 30 days. The amendment will be effective on the date the amendment is signed by all PA Signatories and filed with the ACHP. If the amendment is not signed within 30 days of receipt, RUS will reinitiate consultation for another 15 days. If all PA Signatories do not agree to the amendment, RUS will determine that the PA will stand as is.
  - C. PA Attachments (e.g., Cultural Resources Management Plan) may be amended with a streamlined process. Any of the PA Signatories may propose an amendment to a PA attachment to RUS by submitting a request in writing. If RUS, in consultation with the amendment proponent, concurs that the amendment improves or updates the attachment(s), then RUS will share the proposed amendment with other PA Signatories for a 30-day review period. If no comments are received at the end of the review period, RUS will move forward with the proposed amendment and incorporate it into the PA.
  - D. RUS will document all amendments to the PA, or PA Attachments, in Attachment D, Amendment Log. RUS will provide an updated version of the PA to the Concurring Parties following each instance of amendment.
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## 405 XI. TERMINATION

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- A. If any of the PA Signatories determine that its terms will not or cannot be carried out, that party shall immediately notify RUS, who will consult with the other PA Signatories to attempt to develop an amendment per Stipulation X, above. If, within 30 days (or another time period agreed to by all PA Signatories), an amendment cannot be reached, any PA Signatory may terminate the PA upon written notification to the other PA Signatories.

- 412           **B.**     If the PA is terminated, and prior to work continuing on the Project, RUS must either:
- 413                     i.     Execute a Memorandum of Agreement pursuant to 36 CFR 800.6; or
- 414                     ii.    Request, take into account, and respond to the comments of the ACHP under 36 CFR
- 415                             800.7.
- 416           **C.**     RUS shall notify the PA Signatories and Consulting Parties as to the course of action it will
- 417                     pursue under Stipulation IX.B above.

418           **XII. DURATION OF THIS PA**

- 419           **A.**     Unless otherwise amended or terminated in accordance with Stipulation X or XI, this PA will
- 420                     expire 7 years from the date of Execution.
- 421           **B.**     RUS and Unicom will review all sections of this PA every year to update outdated statutes,
- 422                     best practices, and contact information, and to consider whether organizations who may have
- 423                     originally declined participation may wish to participate as a Consulting Party. If RUS
- 424                     determines the PA may need to be updated, RUS will notify the PA Signatories, Consulting
- 425                     Parties, and other interested parties and invite them to consult on the proposed changes.
- 426                     Amendments to the PA would be consistent with Stipulation X: *Amendments*.

427           **EXECUTION** of this PA by RUS, the Corps, SHPO, and implementation of its terms, evidences that RUS

428                     has taken into account the effects of this Undertaking on historic properties and afforded the ACHP an

429                     opportunity to comment.

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**SIGNATURE PAGES – SIGNATORIES**  
**PROGRAMMATIC AGREEMENT**  
**BY AND AMONG THE**  
**U.S. DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE**  
**U.S. ARMY CORPS OF ENGINEERS AND**  
**ALASKA STATE HISTORIC PRESERVATION OFFICER**  
**REGARDING THE**  
**AU-ALEUTIAN FIBER-OPTIC PROJECT, ALASKA**

**SIGNATORY**  
**U.S. DEPARTMENT OF AGRICULTURE, RURAL UTILITIES SERVICE**  
**BARBARA**  
**By: BRITTON**

Digitally signed by BARBARA  
BRITTON  
Date: 2021.07.07 11:38:21 -0500

Barbara Britton, Director, Engineering and Environmental, U.S. Department of Agriculture, Rural Utilities Service

**DATE:** \_\_\_\_\_

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**SIGNATURE PAGES – SIGNATORIES**  
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**ALASKA STATE HISTORIC PRESERVATION OFFICER**  
**REGARDING THE**  
**AU-ALEUTIAN FIBER-OPTIC PROJECT, ALASKA**

**SIGNATORY**  
**ALASKA STATE HISTORIC PRESERVATION OFFICER**

By:   
Judith Bittner, State Historic Preservation Officer, Alaska State Historic Preservation Office

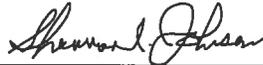
DATE: 7/13/2021

**SIGNATURE PAGES – SIGNATORIES**

**PROGRAMMATIC AGREEMENT  
BY AND AMONG THE  
U.S. DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE  
U.S. ARMY CORPS OF ENGINEERS AND  
ALASKA STATE HISTORIC PRESERVATION OFFICER  
REGARDING THE  
AU-ALEUTIAN FIBER-OPTIC PROJECT, ALASKA**

**SIGNATORY  
U.S. ARMY CORPS OF ENGINEERS, ALASKA DISTRICT**

**By:** \_\_\_\_\_  
Shannon Johnson, South Branch Chief



**DATE:** \_\_\_\_\_

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**SIGNATURE PAGES – INVITED SIGNATORIES**

**INVITED SIGNATORY**

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By 

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Chris Mace – Vice-President, GCI Network Services & Chief Engineer

DATE: 7/8/2021

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**SIGNATURE PAGES – CONCURRING PARTIES**

**CONCURRING PARTY  
NATIONAL PARK SERVICE**

**By: JEFFREY MOW** Digitally signed by JEFFREY MOW  
Date 2021.07.08 11:04:56 -06'00'  
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Jeff Mow, Acting Regional Director, National Park Service Interior Region 11

**DATE:** \_\_\_\_\_

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**SIGNATURE PAGES – CONCURRING PARTIES**

**CONCURRING PARTY**  
**ALUTIIQ MUSEUM AND ARCHAEOLOGICAL REPOSITORY**

By:  \_\_\_\_\_  
April Cancellor, Executive Director

DATE: July 6th, 2021

**DEFINITIONS**523  
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525 **ACHP** – The Advisory Council on Historic Preservation (ACHP) is an independent federal agency that  
526 promotes the preservation, enhancement, and productive use of our nation's historic resources, and advises  
527 the President and Congress on national historic preservation policy. The NHPA gives the ACHP the legal  
528 responsibility to assist federal agencies in their efforts and to ensure they consider preservation during  
529 project planning.

530 **Concurring Party** – Entities that have participated in the development of the PA. The refusal of any party  
531 invited to concur in the programmatic agreement does not invalidate the programmatic agreement.

532 **Consultation** – The process of seeking, discussing, and considering the views of other participants, and,  
533 where feasible, seeking agreement with them regarding matters arising in the Section 106 process.

534 **Consulting Party** – Any group, entity, or person that has a demonstrated interest in the Project and has  
535 participated in the PA development. This includes Tribes, agencies, local governments, non-profit  
536 organizations, and the Permittee.

537 **Cultural Resource** – Archaeological, historic, or architectural resources, structures, or places that may  
538 exhibit human activity or occupation and/or may be places of religious, spiritual, or cultural significance to  
539 tribes, or meet the criteria of a Traditional Cultural Property.

540 **Effect** – Alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for  
541 the National Register.

542 **Execution** – Refers to the date the PA goes into effect and is defined as the date that the last Signatory  
543 signs the document and it is filed with the ACHP. At that point, the PA is considered executed.

544 **Historic Property** – Any prehistoric or historic district, site, building, structure, or object included in, or  
545 eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior.  
546 This term includes artifacts, records, and remains that are related to and located within such properties. The  
547 term includes properties of traditional religious, spiritual, or cultural importance to a Tribe and that meet  
548 the National Register criteria.

549 **Intertidal** – operations which occur in areas between high tide line and mean low water.

550 **Marine** – operations which occur in areas below MLW in marine waters.

551 **NHPA** – The National Historic Preservation Act (NHPA), 54 USC §§ 300101 to 307108, is the primary  
552 federal law governing the preservation of historic resources in the U.S. The law established a national  
553 preservation program and a system of procedural protections which encourage the identification and  
554 protection of historic resources of national, state, tribal and local significance.

555 **Phase/Project Phase** - Unicom proposes to construct the Project in two Phases: Terrestrial/Intertidal and  
556 Marine.

557 **Programmatic Agreement** – A document that records the terms and conditions agreed upon to resolve the  
558 potential adverse effects of a Federal agency program, complex undertaking, or other situations in  
559 accordance with 36 CFR 800.14(b).

560 **Project** – All aspects, including those not currently defined or may be defined in the future of Unicom's  
561 proposed fiber-optic line.

562 **Section 106** – Section 106 of the NHPA of 1966 requires federal agencies to consider the effects of projects,  
563 activities, or programs they carry out, assist, fund, permit, license, or approve throughout the country  
564 (known as “Undertakings”) on historic properties. The Section 106 process requires federal agencies to  
565 identify historic properties, assess effects on those properties, and consider alternatives to resolve those  
566 effects. Section 106 gives the ACHP, interested parties, and the public the chance to weigh in on these  
567 matters before a final decision is made. The ACHP has issued regulations, 36 CFR 800, which guide how  
568 agencies should fulfill this responsibility.

569 **SHPO** – Every State and U.S. Territory has a State Historic Preservation Officer (SHPO) who, with the  
570 support of qualified staff, is charged with: conducting a comprehensive survey of historic properties;  
571 maintaining an inventory of historic properties; identifying and nominating eligible properties to the NRHP;  
572 advising and assisting Federal, State and local governments in matters of historic preservation; preparing  
573 and implementing a statewide historic preservation plan; providing public information, education, training  
574 and technical assistance; and providing consultation for Federal undertakings under the Section 106  
575 provision of the National Historic Preservation Act.

576 **Signatory** – The Corps, SHPO, and Unicom are Signatories to this PA. The Signatories have sole authority  
577 to execute, amend or terminate the PA.

578 **Terrestrial** – operations which occur in areas above High Tide Line (HTL).

579 **Undertaking** – a project, activity, or program funded in whole or in part under the direct or indirect  
580 jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried  
581 out with federal financial assistance; and those requiring a federal permit, license, or approval.

582

## ATTACHMENTS

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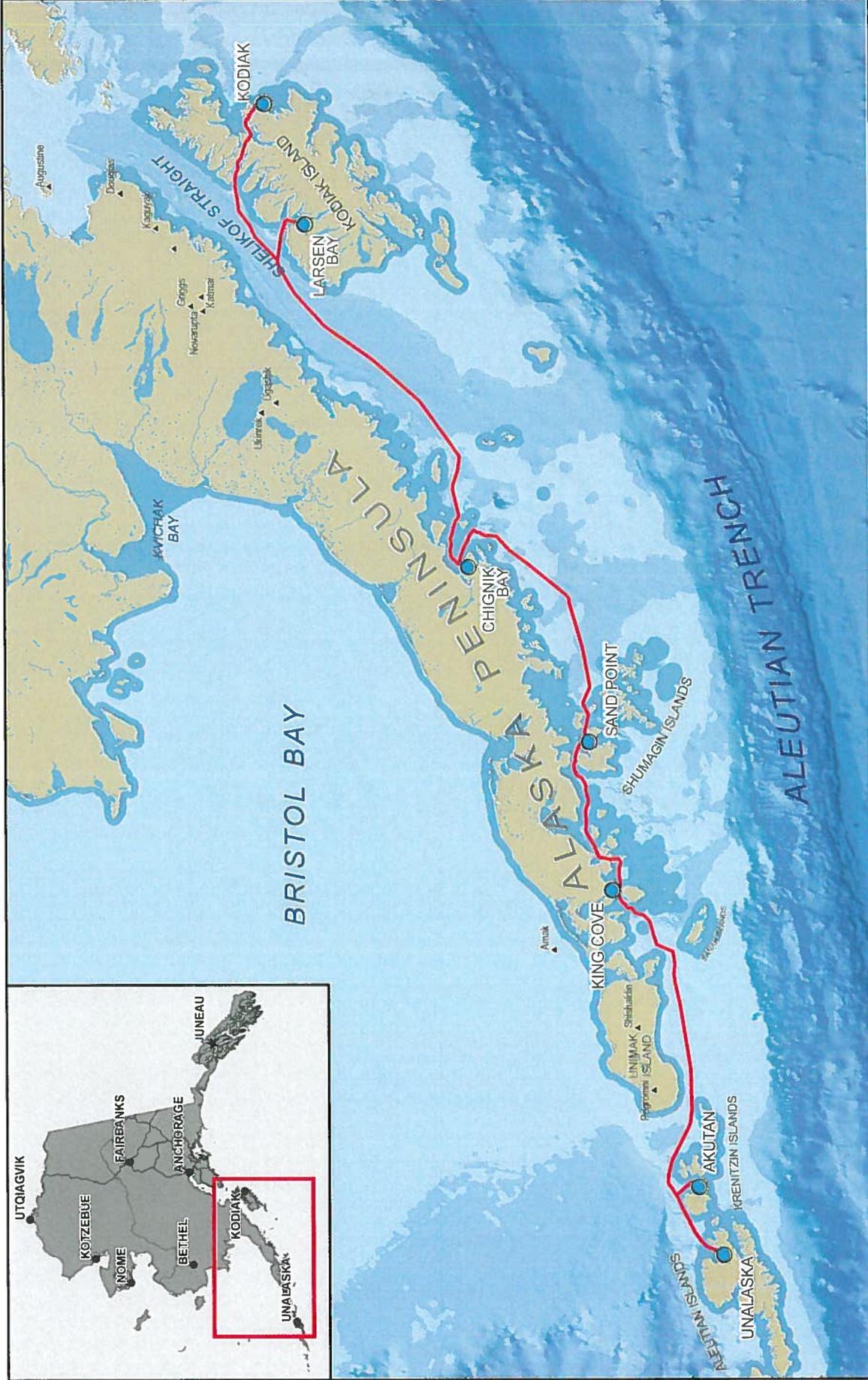
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## **ATTACHMENT 1: MAPS**



- Landfall Location
- Fiber Optic Route



<b>GCI AU-Aleutian Programmatic Agreement</b>
<b>Map 1: Project Overview</b>
Community Fiber Distribution
Date: 4/30/2021



-  Existing GCI Facility
-  Terrestrial Fiber Optic Cable
-  Marine Fiber Optic Cable
-  Beach Manhole



<b>GCI AU-Aleutian Programmatic Agreement</b>
<b>Map 2: Larsen Bay</b>
Community Fiber Distribution
Date: 4/30/2021

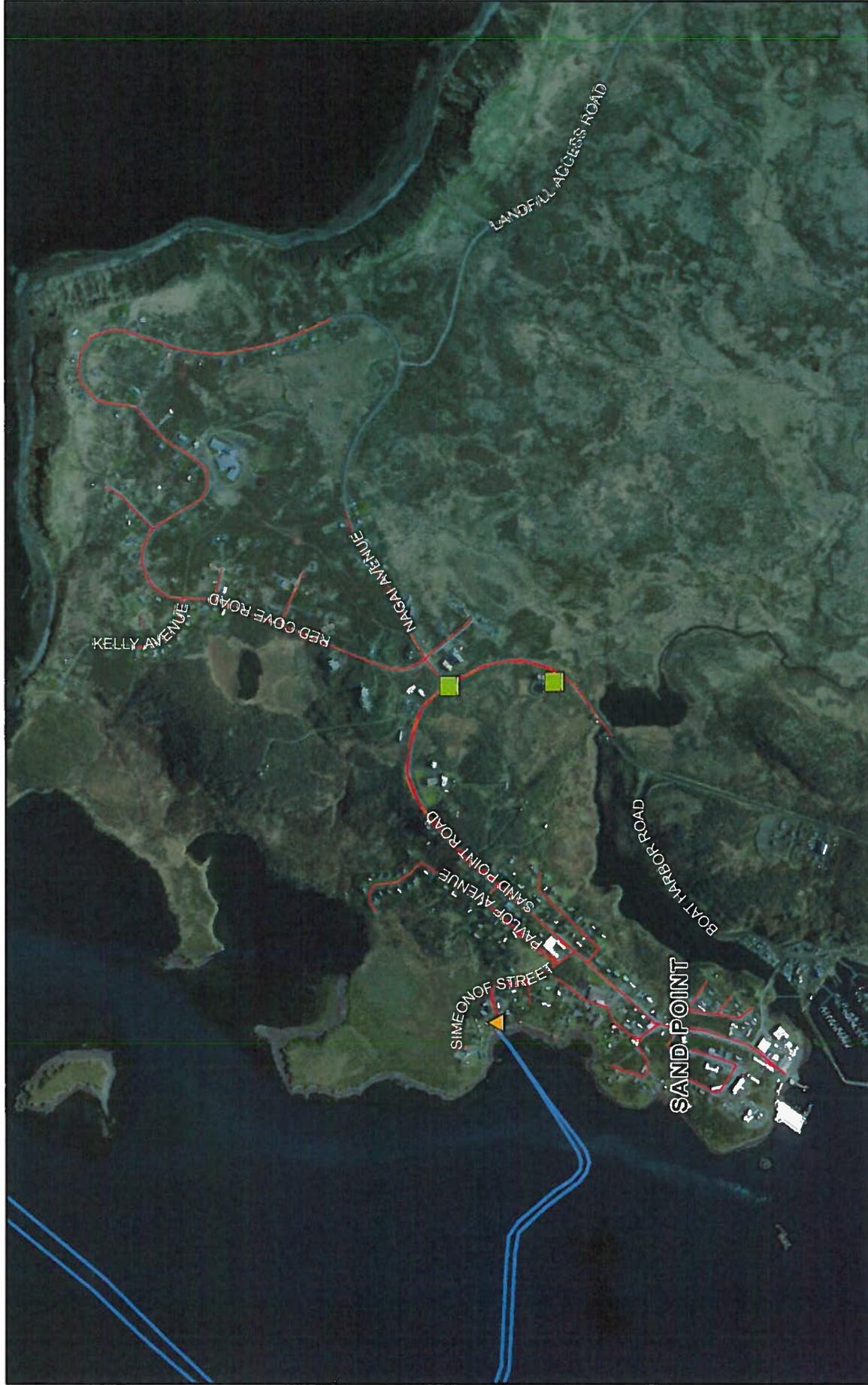


 Proposed GCI Facility	 Terrestrial Fiber Optic Cable
 Beach Manhole	 Marine Fiber Optic Cable

  
0 345 690 1,380 Feet

<b>GCI AU-Aleutian Programmatic Agreement</b>
<b>Map 3: Chignik Bay</b> Community Fiber Distribution
Date: 4/30/2021

K13362827-0160GIS\AU Aleutians aprx Map Name: Unicom Landfall  
Imagery Credit: Alsat



**GCI AU-Aleutian  
Programmatic Agreement**

**Map 4: Sand Point**

Community Fiber Distribution

Date: 4/30/2021

Legend:

- Existing GCI Facility
- Beach Manhole
- Terrestrial Fiber Optic Cable
- Marine Fiber Optic Cable

Scale: 0, 450, 900, 1,800 Feet

North Arrow

Map Name: Unicom Landfall

imagery Credit: Maxar



 Existing GCI Facility	 Terrestrial Fiber Optic Cable
 Beach Manhole	 Marine Fiber Optic Cable

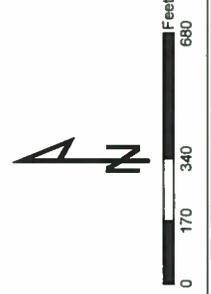




<b>GCI AU-Aleutian Programmatic Agreement</b>	
<b>Map 5: King Cove</b>	
Community Fiber Distribution	
Date: 4/30/2021	



-  Existing GCI Facility
-  Beach Manhole
-  Terrestrial Fiber Optic Cable
-  Marine Fiber Optic Cable



**GCI AU-Aleutian  
Programmatic Agreement**

**Map 6: Akutan**

Community Fiber Distribution

Date: 4/30/2021



 Existing GCI Facility	 Terrestrial Fiber Optic Cable
 Beach Manhole	 Marine Fiber Optic Cable



 0 1,000 2,000 4,000 Feet

<b>GCI AU-Aleutian Programmatic Agreement</b>
<b>Map 7: Unalaska</b>
Community Fiber Distribution
Date: 4/30/2021

K133162827-0160GISAU Aleutians aprx Map Name Unicom Landlial  
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592 **ATTACHMENT 2: PROJECT DESCRIPTION AND AREA OF**  
593 **POTENTIAL EFFECT AND CONSTRUCTION ACTIVITIES**

594

**595 Project Description**

596 Unicom’s Project will extend broadband service to 6 southwest Alaska communities that are located  
597 between Kodiak and Unalaska and which includes both marine and terrestrial components. Originating in  
598 Kodiak at an existing Unicom network connection, the Project consists of placing approximately 848 miles  
599 of fiber-optic cable (FOC) on the ocean floor through Shelikof Strait and then parallel along the Alaska  
600 Peninsula and Aleutian Archipelago to the southwest until it reaches Unalaska. The submarine FOC  
601 between Kodiak and Unalaska will include FOC connections to the communities of Larsen Bay, Chignik,  
602 Sand Point, and King Cove, and Akutan.

603 The installation of the FOC in marine waters will consist of either laying of the FOC directly onto the sea  
604 floor or installing the FOC in a shallow trench via a towed plow. The trench created by the plow consists  
605 of a 12-inch wide by up to five-foot deep slit into which the FOC is laid. After FOC installation within the  
606 trench, the plow is designed so that the sidewalls are expected to collapse and bury the FOC. Post-lay  
607 inspection of the FOC installation will be conducted using a ROVJET 207 series or similar remotely  
608 operated vehicle (ROV). In waters less than 15 meters deep in which use of the towed sled is not feasible,  
609 the cable may be buried using a tracked ROV, or divers using hand jets and water lifts. The disturbance  
610 footprint on the seafloor of these methods is comparable to that of a towed sled.

611 The onshore components of the Project in each community include the subsurface installation of 4-inch  
612 conduits containing the FOC in the intertidal zone upslope to a beach manhole (BMH) installed above the  
613 high tide line (HTL). The installation of the BMH would occur within an approximately 25 ft<sup>2</sup> area. The  
614 marine FOC is anchored to the BMH, and from there is connected to a terrestrial FOC and installed within  
615 the community via trenching along the toe of slope of existing roadways, with trench dimensions of  
616 approximately three feet wide by three feet deep. The terrestrial FOC will connect the marine FOC in the  
617 BMH with a communications shelter (cable landing station) that will be constructed at existing Unicom  
618 telecommunications facilities within each community. These communications shelters will consist of  
619 prefabricated buildings and be placed on gravel pads with an area of approximately 625 ft<sup>2</sup>.

620 The terrestrial installation in each community will occur in two phases; the shore route installation, and the  
621 fiber-to-the-premise (FTTX) installation. The shore route includes the installation of the BMH and the  
622 connection from the BMH to the cable landing station. The installation of the shore route phases in all  
623 communities is anticipated to begin in Unalaska in October 2021, with sequential installation of additional  
624 shore routes completed by Spring 2022. The FTTX installation will follow a similar sequence but will be  
625 spread out over several seasons. FTTX installation is anticipated to begin in Unalaska in October 2021  
626 (after completion of the shore route installation). FTTX in Akutan is planned for the 2022 season, with  
627 King Cove and Sand Point in 2023 season, and Chignik Bay and Larsen Bay in the 2024 season.

628 Heavy equipment used in intertidal areas and terrestrial wetlands will be placed on mats, with the exception  
629 of beaches with firm sediments (Unalaska, Akutan), such as large boulders. During trench excavation,  
630 excavated material will be side-cast next to trenches and be used to bury the cable and BMH. All trenched  
631 (intertidal and terrestrial) areas will have a maximum side cast width of six feet. The maximum potential  
632 footprint for trenching activities is a width of 15 feet. Terrestrial installation crews will use backhoes and  
633 standard trenching techniques. All areas will be returned to pre-construction elevations, and all trenched  
634 areas will be back filled and re-graded to original conditions. No buildings or structures will be affected by  
635 the installation of the FOC.

636 In general, equipment used during terrestrial and intertidal installation of the FOC in each community may  
637 include:

- 638 • Rubber wheel backhoe
- 639 • Tracked excavator or backhoe (medium to large excavator required at Unalaska)

- 640 • Small tracked excavator
- 641 • Utility truck and trailer to deliver materials
- 642 • Chain trencher
- 643 • Hand tools (e.g., shovels, rakes, pry bars)
- 644 • Survey equipment
- 645 • Winch or turning sheave
- 646 • Small utility boat to run pull line to beach
- 647 • Dive boat with hand jetting tools
- 648 • Splicing equipment, small genset and tent

#### 649 **Area of Potential Effects**

650 The area of potential effects (APE) is the area within which agencies consider a proposed project's effects  
651 on historic property, should they be present. The APE is not synonymous with a project footprint or  
652 disturbance area.

653 RUS has defined the area of potential effect (APE) for effects for the following three construction zones:

- 654 • Marine: areas below Mean Low Water (MLW) in marine waters
- 655 • Intertidal: areas between High Tide Line (HTL) and MLW
- 656 • Terrestrial: areas above HTL

#### 657 **Marine Construction Zone Area of Potential Effect**

658 The APE for the marine component of the Project consists of a 150-foot buffer extending in each direction  
659 from the proposed installation alignment of the subsea cable resulting in a 300-foot wide corridor.

#### 660 **Intertidal Construction Zone Area of Potential Effect**

661 The APE for the intertidal components of the Project consists of a 30-foot buffer extending in each direction  
662 from the proposed installation alignment of the fiber-optic cable resulting in 60-foot wide corridor. No  
663 indirect effects to historic properties are anticipated as a result of the intertidal components of the Project  
664 because any auditory, visual, olfactory, and/or atmospheric effects will be limited or no-existent in scale  
665 and temporary in duration (i.e., site restoration after subsurface utility installation, project components are  
666 buried or at grade).

#### 667 **Terrestrial Construction Zone Area of Potential Effect**

668 The APE for the terrestrial components of the Project consists of a 30-foot buffer extending in each direction  
669 from the proposed installation alignment of the fiber-optic cable<sup>5</sup> resulting in 60-foot wide corridor. The  
670 APE includes the disturbance footprint of the BMH placed above the high tide line and into which the  
671 marine FOC comes onshore. The footprint of the BMHs is approximately 25ft<sup>2</sup>. The APE also includes the  
672 excavation associated with the BMH, and an approximately 25ft by 25ft gravel pad which will be installed  
673 at existing Unicom facilities within each community. No indirect effects to historic properties are  
674 anticipated as a result of the terrestrial components of the Project because any auditory, visual, olfactory,  
675 and/or atmospheric effects will be limited or no-existent in scale and temporary in duration (i.e., site  
676 restoration after subsurface utility installation, project components are buried or at grade). Additionally, no  
677 indirect effects to historic properties are anticipated as a result of the construction of communication shelters  
678 associated with the Project because any auditory, olfactory, and/or atmospheric effects will be limited or

---

<sup>5</sup> In general, the fiber-optic cable will be installed near the outer margins of existing road rights-of-way within the communities.

679 no-existent in scale and temporary in duration. Furthermore, potential visual effects are not anticipated as  
680 the communications shelters will be constructed at existing Unicom facilities which already contain other  
681 communications structures and equipment (e.g., towers, shelters, dishes, fencing).

682

683

684

685 **ATTACHMENT 3: LIST OF PARTIES INVITED TO PARTICIPATE IN**  
686 **THE SECTION 106 PROCESS**

687

- 688 **Federally Recognized Tribes**
- 689 Agdaagux Tribe of King Cove
- 690 Chignik Bay Tribal Council
- 691 Native Village of Afognak
- 692 Native Village of Akutan (Akutan Traditional
- 693 Council)
- 694 Native Village of Belokofski
- 695 Native Village of Karluk
- 696 Native Village of Larsen Bay
- 697 Native Village of Ouzinkie
- 698 Native Village of Port Lions
- 699 Native Village of Unga
- 700 Pauloff Harbor Tribe
- 701 Qagan Tayagungin Tribe of Sand Point
- 702 Qawalangin Tribe of Unalaska
- 703 Sun’aq Tribe of Kodiak
- 704 Tangirnaq Native Village
- 705
- 706 **ANSCA Corporations and Non-Profits**
- 707 Afognak Native Corporation
- 708 Akutan Corporation
- 709 Aleut Corporation
- 710 Aleutian Pribolof Islands Association
- 711 Bristol Bay Native Association
- 712 Bristol Bay Native Corporation
- 713 Far West, Incorporated
- 714 King Cove Corporation Inc.
- 715 Koniag, Incorporated
- 716 Natives of Kodiak, Incorporated

- 717 Ounalashka Corporation
- 718 Ouzinke Native Corporation
- 719
- 720 **State and Federal Agencies**
- 721 Advisory Council on Historic Preservation
- 722 Alaska Department of Natural Resources (DNR)
- 723 Alaska State Historic Preservation Officer
- 724 (SHPO)
- 725 National Park Service (NPS)
- 726 U.S. Coast Guard (USCG)
- 727
- 728 **City and Borough Governments**
- 729 Aleutians East Borough
- 730 City of Akutan
- 731 City of Chignik
- 732 City of King Cove
- 733 City of Kodiak
- 734 City of Larsen Bay
- 735 City of Sand Point
- 736 City of Unalaska
- 737 Kodiak Island Borough
- 738 Lake and Peninsula Borough
- 739
- 740 **Other**
- 741 Alutiiq Museum and Archaeological Repository
- 742 Kodiak History Museum
- 743 Russian Orthodox Diocese of Sitka and Alaska
- 744 Russian Orthodox Sacred Sites of Alaska
- 745
- 746

747



752 **ATTACHMENT 5: CULTURAL RESOURCES MANAGEMENT PLAN**

753

754

**CULTURAL RESOURCES MANAGEMENT PLAN**

755

**for the**

756

**Unicom, Incorporated AU-Aleutians Fiber Optic Project**

757

758

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791 **LIST OF ACRONYMS**

792	AHRS.....	Alaska Heritage Resources Survey
793	APE.....	Area of potential effect
794	AS.....	Alaska Statute
795	BMH.....	Beach manhole
796	CFR.....	Code of Federal Regulations
797	CRMP.....	Cultural Resource Management Plan
798	DNR.....	Alaska Department of Natural Resources
799	FOC.....	Fiber-Optic Cable
800	HTL.....	High Tide Line
801	MLW.....	Mean Low Water
802	NHPA.....	National Historic Preservation Act
803	NOAA.....	National Oceanographic and Atmospheric Administration
804	NPS.....	National Park Service
805	NRHP.....	National Register of Historic Places
806	OHA.....	Alaska Office of History and Archaeology
807	OSHA.....	Occupational Safety and Health Administration
808	PA.....	Programmatic Agreement
809	Project.....	Unicom AU-Aleutians Project
810	ROV.....	Remotely Operated Vehicle
811	RUS.....	Rural Utilities Service
812	SOI.....	Secretary of the Interior
813	SHPO.....	Alaska State Historic Preservation Office
814	SRB&A.....	Stephen R. Braund & Associates
815	Unicom.....	Unicom, Incorporated
816	USACE.....	U.S. Army Corps of Engineers
817		

## 818 I. INTRODUCTION AND PURPOSE

819 The U.S. Department of Agriculture, Rural Utilities Service (RUS), the U.S. Army Corps of Engineers  
820 (USACE), the Alaska State Historic Preservation Officer (SHPO), National Park Service (NPS), and  
821 Unicom, Incorporated (Unicom), have prepared this Cultural Resources Management Plan (CRMP) as part  
822 of the development of a Programmatic Agreement (PA) under Section 106 of the National Historic  
823 Preservation Act (NHPA) to avoid or minimize potential adverse effects to historic properties that may  
824 result from ground-disturbing construction activities associated with Unicom's AU Aleutians Project  
825 (Project). This plan outlines the processes and protocols by which the Project will seek ways to avoid and  
826 minimize the potential for adverse impacts to cultural resources and historic properties during the  
827 construction of the Project through analysis of subsea sonar data by a marine archaeologist, archaeological  
828 monitoring of terrestrial construction activities, implementing contractor awareness training, and  
829 establishing inadvertent discovery protocols in the event that archaeological, historic, or human remains  
830 are encountered during Project activities.

## 831 II. PROJECT DESCRIPTION

832 Unicom's Project will extend broadband service to 6 southwest Alaska communities that are located  
833 between Kodiak and Unalaska and which includes both marine and terrestrial components. Originating in  
834 Kodiak at an existing Unicom network connection, the Project consists of placing approximately 848 miles  
835 of fiber-optic cable (FOC) on the ocean floor through Shelikof Strait and then parallel along the Alaska  
836 Peninsula and Aleutian Archipelago to the southwest until it reaches Unalaska. The submarine FOC  
837 between Kodiak and Unalaska will include FOC connections to the communities of Larsen Bay, Chignik  
838 Bay, Sand Point, King Cove, and Akutan.

839 The installation of the FOC in marine waters will consist of either laying the FOC directly onto the sea floor  
840 or installing the FOC in a shallow trench via a towed plow. The trench created by the plow consists of a  
841 12-inch wide by up to five-foot deep slit into which the FOC is laid. After FOC installation within the  
842 trench, the plow is designed so that the sidewalls are expected to collapse and bury the FOC. Post-lay  
843 inspection of the FOC installation will be conducted using a ROVJET 207 series or similar remotely  
844 operated vehicle (ROV). In waters less than 15 meters deep in which use of the towed sled is not feasible,  
845 the cable may be buried using a tracked ROV, or divers using hand jets and water lifts. The disturbance  
846 footprint on the seafloor of these methods is comparable to that of a towed sled.

847 The onshore components of the Project in each community include the subsurface installation of 4-inch  
848 conduits containing the FOC in the intertidal zone upslope to a beach manhole (BMH) installed above the  
849 high tide line (HTL). The installation of the BMH would occur within an approximately 25 ft<sup>2</sup> area. The  
850 marine FOC is anchored to the BMH, and from there is connected to a terrestrial FOC and installed within  
851 the community via trenching along the toe of slope of existing roadways, with trench dimensions of  
852 approximately three feet wide by three feet deep. The terrestrial FOC will connect the marine FOC in the  
853 BMH with a communications shelter that will be constructed at existing Unicom telecommunications  
854 facilities within each community. These communications shelters will consist of prefabricated buildings  
855 and be placed on gravel pads with an area of approximately 625 ft<sup>2</sup>.

856 Heavy equipment used in intertidal areas and terrestrial wetlands will be placed on mats, with the exception  
857 of beaches with firm sediments (Unalaska, Akutan), such as large boulders. During trench excavation,  
858 excavated material will be side-cast next to trenches and be used to bury the cable and BMH. All trenched  
859 (intertidal and terrestrial) areas will have a maximum side cast width of six feet. The maximum potential  
860 footprint for trenching activities is a width of 15 feet. Terrestrial installation crews will use backhoes and  
861 standard trenching techniques. All areas will be returned to pre-construction elevations, and all trenched

862 areas will be back filled and re-graded to original conditions. No buildings or structures will be affected by  
863 the installation of the FOC.

864 In general, equipment used during terrestrial and intertidal installation of the FOC in each community may  
865 include:

- 866 • Rubber wheel backhoe
- 867 • Tracked excavator or backhoe (medium to large excavator required at Unalaska)
- 868 • Small tracked excavator
- 869 • Utility truck and trailer to deliver materials
- 870 • Chain trencher
- 871 • Hand tools (e.g., shovels, rakes, pry bars)
- 872 • Survey equipment
- 873 • Winch or turning sheave
- 874 • Small utility boat to run pull line to beach
- 875 • Dive boat with hand jetting tools
- 876 • Splicing equipment, small genset and tent

877

#### 878 1. Area of Potential Effects

879 Consistent with Attachment B of the PA, the RUS has defined the area of potential effect (APE) for effects  
880 for three construction zones; Marine, Intertidal, and Terrestrial. The classifications of these APEs are listed  
881 below and the lengths of these APE within the communities are presented below in **Table 1**.

- 882 • Marine: areas below Mean Low Water (MLW) in marine waters
- 883 • Intertidal: areas between High Tide Line (HTL) and MLW
- 884 • Terrestrial: areas above HTL

885

886 **Table 1: APE Lengths by Type/Location**

APE Type/Location	Linear Distance
Marine Fiber-Optic Cable	848 Miles
Kodiak Intertidal	200 feet
Larsen Bay Intertidal and Terrestrial	1.8 miles
Chignik Bay Intertidal and Terrestrial	3.4 miles
Sand Point Intertidal and Terrestrial	7 miles
King Cove Intertidal and Terrestrial	4 miles
Akutan Intertidal and Terrestrial	0.9 miles
Unalaska Intertidal and Terrestrial	30.9 miles

#### 887 **Marine Construction Zone Area of Potential Effect**

888 The APE for the marine component of the Project consists of a 150-foot buffer extending in each direction  
889 from the proposed installation alignment of the subsea cable resulting in a 300-foot wide corridor.

#### 890 **Intertidal Construction Zone Area of Potential Effect**

891 The APE for the intertidal components of the Project consists of a 30-foot buffer extending in each direction  
892 from the proposed installation alignment of the fiber-optic cable resulting in 60-foot wide corridor. No  
893 indirect effects to historic properties are anticipated as a result of the intertidal components of the Project  
894 because any auditory, visual, olfactory, and/or atmospheric effects will be limited or no-existent in scale

895 and temporary in duration (i.e., site restoration after subsurface utility installation, project components are  
896 buried or at grade).

### 897 **Terrestrial Construction Zone Area of Potential Effect**

898 The APE for the terrestrial components of the Project consists of a 30-foot buffer extending in each direction  
899 from the proposed installation alignment of the fiber-optic cable resulting in 60-foot wide corridor. The  
900 APE includes the disturbance footprint of the BMH placed above the high tide line and into which the  
901 marine FOC comes onshore. The footprint of the BMHs is approximately 25ft<sup>2</sup>. The APE also includes the  
902 excavation associated with the BMH, and an approximately 25ft by 25ft gravel pad which will be installed  
903 at existing Unicom facilities within each community. Additionally, no indirect effects to historic properties  
904 are anticipated as a result of the construction of communication shelters associated with the Project because  
905 any auditory, olfactory, and/or atmospheric effects will be limited or non-existent in scale and temporary  
906 in duration. Furthermore, potential visual effects are not anticipated as the communications shelters will be  
907 constructed at existing Unicom facilities which already contain other communications structures and  
908 equipment (e.g., towers, shelters, dishes, fencing).

### 909 **2. Potential Project Effects**

910 Final design of both the marine and terrestrial alignments and components (e.g., BMHs) of the Project have  
911 not yet been completed. However, potential effects to historic properties resulting from Project activities  
912 can be considered with the intent of proposing strategies to avoid or minimize any potential effects that  
913 may arise as the Project moves forward. Potential Project effects resulting from the marine component of  
914 the Project include disruption of or damage to submerged cultural resources (e.g., shipwrecks) during  
915 installation of the fiber-optic cable on the seabed using the plow/sled. Potential Project effects resulting  
916 from the intertidal and terrestrial components of the Project include physical damage to surface and  
917 subsurface archaeological and historic resources, buildings, structures, or roadways or trails as a result of  
918 the ground-disturbing activities associated with the installation of the fiber-optic cable. There are no  
919 anticipated visual effects associated with the Project, as the ground disturbance associated with the  
920 installation of a subsurface utility is temporary in duration, and the ground surface will be returned to its  
921 original condition and grade. Communication shelters built adjacent to existing Unicom facilities will also  
922 not introduce any new intrusive visual elements due to their small size and that they will be placed next to  
923 existing telecommunications equipment.

## 924 **III. PROJECT INVENTORY EFFORTS**

### 925 **1. Maritime Cultural Resources**

926 On behalf of Unicom, DOWL reviewed the National Ocean and Atmospheric Administration's (NOAA)  
927 Wrecks and Obstructions database and did not identify any documented shipwrecks within the marine APE  
928 of the proposed Project (NOAA 2021). In addition, a 2017 geophysical and geotechnical marine sonar  
929 survey conducted for an earlier proposed Project route overlaps with the westernmost portion of the current  
930 project from Akutan to Unalaska (Terrasond 2017). The 2017 survey data was reviewed by a marine  
931 archaeologist, who recommended that no objects of anthropogenic origin which could be considered  
932 eligible for listing in the NRHP were identified within the geophysical and geotechnical marine sonar  
933 survey data (Rogers 2017).

### 934 **2. Terrestrial Cultural Resources**

935 On behalf of Unicom and DOWL, Stephen R. Braund & Associates (SRB&A) conducted a desktop study  
936 of previously identified cultural resource sites within the terrestrial and intertidal APE of Unicom's  
937 proposed Project, and provided recommendations regarding minimization measures that could be enacted

938 as part of the Project (SRB&A 2021). In summary, SRB&A identified a total of 79 Alaska Heritage  
939 Resources Survey (AHRs) properties within the terrestrial and intertidal APE of the Project. Of these  
940 properties, seven have been determined eligible for listing in the National Register of Historic Places  
941 (NRHP), one is a National Historic Landmark (NHL), three are contributing properties to the NHL, two  
942 have been determined not eligible for listing in the NRHP, and the remaining 66 properties have not been  
943 evaluated for their eligibility for listing in the NRHP. Additionally, the Project locations are situated in  
944 areas with long records of human occupation and which have not been subject to widespread and detailed  
945 cultural resources investigations.

946 Within the maximum potential Project footprint of 15 feet (e.g., a 3-foot-wide trench and two six-foot side  
947 cast areas on either side of the trench), 41 AHRs properties are recorded. Table 2 presents a list of these  
948 properties and their type.

949 **Table 2: AHRs Properties within Project Footprint**

AHRs Number	Property Name	Property Type
CHK-00019	Alaska Canning Company	Historic Site
CHK-00041	Andersonville	Historic Site
CHK-00063	Alaska Packers Association Chignik Cannery Historic District	District
CHK-00083	Chignik Cannery Pipeline	Historic Site
KOD-00142	KOD-00142	Archaeological Site
KOD-00145	Our Point (Uyak Site)	Archaeological Site
KOD-01149	Larsen Bay Cannery Wood-Stave Water Pipeline	Historic Site
UNI-00004	Akutan Village	Historic Site
UNL-00048	Margaret Bay Site	Archaeological Site
UNL-00050	Amaknak Bridge Site	Archaeological Site
UNL-00119	Fort Schwatka	Military Site
UNL-00120	Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army, National Historic Landmark*	National Historic Landmark*
UNL-00121	Fort Mears	Military Site
UNL-00122	Hill 400 Defenses	Military Site
UNL-00123	Airport Buried Site	Archaeological Site
UNL-00203	Expedition Island Dock	Historic Structure†
UNL-00335	Larry Shaishnikoff House	Building†
UNL-00336	Shaishnikoff Building	Building†
UNL-00350	Messmersmith House	Building†
UNL-00352	Swanson House (Moller House, Dyakanoff House)	Building†
UNL-00358	Merculieff House	Building†
UNL-00360	UNL-360 House	Building†
UNL-00362	Ermeloff Building	Building†
UNL-00363	Flora Tutiakoff House	Building†
UNL-00364	Hilda Berikoff House	Building†
UNL-00372	Aleutian Adventure Sports (Unalaska Tavern)	Building†
UNL-00374	UNL-00374 Building	Building†
UNL-00381	10 West Broadway Avenue	Building†

UNL-00395	Rod House (Dorsey House)	Building <sup>†</sup>
UNL-00405	Stein-Robinson Property	Building <sup>†</sup>
UNL-00415	Icicle Seafoods House	Building <sup>†</sup>
UNL-00416	UNL-00416 Cabana	Building <sup>†</sup>
UNL-00418	Morris Property	Building <sup>†</sup>
UNL-00433	House #4	Building <sup>†</sup>
UNL-00437	Alyeska Seafoods House #9	Building <sup>†</sup>
UNL-00442	House #14	Building <sup>†</sup>
UNL-00463	House #29	Building <sup>†</sup>
UNL-00464	House #30	Building <sup>†</sup>
UNL-00592	Cabana with Tower at 547 Dutton Rd. (Bldg. 2039: 16x20 Barracks)	Building <sup>†</sup>
UNL-00602	Powerhouse, Building 409	Building <sup>†</sup>
XPM-00106	Sand Point Graves	Archaeological Site
* This NHL covers much of Amaknak Island, including numerous buildings, structures, and ruins (e.g., foundations). Although the project footprint intersects with the boundary of this NHL, it is not anticipated to adversely affect the property or any contributing elements.		
† There are no anticipated adverse effects to any buildings or historic structures resulting from the Project.		

### 950 3. Avoidance and Minimization of Adverse Effects to Historic Properties

951 As noted above, the potential exists for Unicom's Project to have adverse effects on known and unknown  
952 historic properties. This section describes the processes by which Unicom or consultants hired on their  
953 behalf shall enact ways to avoid or minimize the potential for Unicom's Project to result in uncontrolled  
954 adverse effects to known and unknown historic properties

#### 955 1. Marine APE Avoidance and Minimization

956 As part of the Project, Unicom will be obtaining subsea mapping and geophysical remote-sensing survey  
957 data of the marine APE in 2021. As required in PA Stipulation V.A, Unicom will contract with a marine  
958 archaeologist to conduct an archaeological review and interpretation of the remote-sensing geophysical and  
959 geotechnical data acquired in support of Unicom's proposed Project, as well as historic and archival  
960 database inventory records and prepare a submerged cultural resources evaluation report.

- 961 a) Based on the results of the archaeological evaluation of the subsea sonar data, Unicom will  
962 reroute the marine cable alignment to avoid any potential cultural resources.
- 963 b) Unicom will submit to RUS and Signatories a copy of the marine archaeologist's report and  
964 documentation that the marine cable alignment will not impact submerged cultural resource  
965 sites. However, if the marine cable alignment is modified to avoid cultural resources, the  
966 documentation will include location(s) of identified sites, the original marine cable alignment,  
967 and the modified alignment as both figures and GIS-compatible shapefiles. As per the  
968 requirements of the PA, Unicom will submit the submerged cultural resources evaluation  
969 report and Unicom's summary report regarding the proposed marine cable alignment's  
970 location to RUS, who will then submit to Consulting Parties for a 30-day review and comment  
971 period at least 120 days prior to the commencement of marine construction activities.
- 972 c) Consistent with PA Stipulation V.A, Consulting Parties shall have 30 days to review and  
973 provide comments on the report to RUS. Upon receipt of timely comments, RUS may direct  
974 Unicom to make any appropriate changes or modifications to the proposed marine  
975 construction activities.
- 976 d) Upon completion of any required changes, Unicom shall submit the final report and  
977 documentation to RUS and SHPO for a final 15-day review and approval period.
- 978 e) Upon approval of the report and documentation by RUS and SHPO, RUS will notify the  
979 Permittee that Section 106 obligations for the project phase are complete in accordance with  
980 PA Stipulation VI: *Initiation of Construction and Stop Work Orders*.

## 981 2. Terrestrial and Intertidal Minimization

982 In order to minimize the potential for adverse effects to known and unknown historic properties within the  
983 intertidal and terrestrial APE, Unicom will ensure that the final fiber-optic cable alignment avoids  
984 documented historic buildings and structures which may exist along the existing roadways where the cable  
985 will be installed, and will implement cultural resources monitoring following the protocols outlined below  
986 in Section 7: *Construction Monitoring Plan* in all community locations.

## 987 4. Archaeological Monitoring Plan

988 The purpose of the archaeological monitoring plan is to provide a framework to ensure that ground-  
989 disturbing construction activities associated with the Project are conducted under the supervision of an  
990 archaeologist which meets the Secretary of the Interior's (SOI) Professional Qualification Standards for  
991 Historic Preservation<sup>6</sup>, and to provide clear procedures and chains of authority that will be implemented in  
992 the event that archaeological materials are encountered during a monitored Project activity. During  
993 monitored construction activities, all deposits and sediments below the present ground cover are subject to  
994 review by the monitoring archaeologist, and in the event of a discovery of archaeological materials,  
995 construction work will be halted, the monitoring archaeologist will examine the materials encountered  
996 (which may include some limited testing or additional investigation to adequately characterize the  
997 discovery), and if they are determined to be cultural or archaeological in nature, enact the notification and  
998 consultation procedures outlined below. Should additional archaeological excavation and documentation  
999 of the materials encountered within the boundaries of the ground-disturbance be required, the monitoring  
1000 archaeologist will consult with the appropriate parties to establish a data recovery plan prior to commencing  
1001 additional excavation consistent with PA Stipulation VI: *Resolution of Adverse Effects*. The archaeological  
1002 monitoring procedures contained herein are consistent with the Alaska Office of History and Archaeology  
1003 Historic (OHA) Preservation Series 15 *Monitoring Guidelines* (OHA 2018). They are also designed to

---

<sup>6</sup> SOI's Standards available at: [http://www.nps.gov/history/local-law/arch\\_stnds\\_9.htm](http://www.nps.gov/history/local-law/arch_stnds_9.htm)

1004 accommodate construction techniques, schedules, and logistics to the extent possible while still ensuring  
1005 adequate consideration of archaeological resources that may be encountered during construction activities.  
1006 Archaeological monitoring will conclude when all Project ground-disturbing activities within the  
1007 community are complete.

#### 1008 1. Project Roles and Professional Standards for Archaeological Monitors

1009 Consistent with PA Stipulation I.B and the OHA’s monitoring guidelines (OHA 2018), Unicom shall  
1010 require that an archaeologist meeting SOI Professional Qualification Standards for Archaeology (NPS  
1011 2015a) be present during ground-disturbing Project activities consistent with the terms of the PA. In  
1012 instances where multiple archaeological monitors are required within a single community, an archaeologist  
1013 meeting the SOI Standards will be assigned to supervise and direct subordinate monitors within that  
1014 community. To meet the SOI standards, an archaeologist must have a graduate degree in archaeology or  
1015 closely related field, at least one year of full-time professional experience at a supervisory level (or  
1016 equivalent specialized training) in the study of prehistoric archaeology, at least four months experience in  
1017 general North American archaeology, and a demonstrated ability to carry research to completion. In  
1018 addition to meeting the SOI Standards, archaeological monitors must have experience working in Alaska  
1019 and in identification, recovery, and recordation of perishable and non-perishable cultural resources, both  
1020 prehistoric and historic.

1021 Unicom may elect to assign a principal investigator to oversee and manage all archaeological monitoring  
1022 deployments and activities.

1023 The archaeological monitor(s) will review the site safety plan, participate in any tailgate safety meetings,  
1024 and provide orientation to construction equipment operators prior to the commencement of ground-  
1025 disturbing Project activities in a monitoring event, which will include discussions regarding safety around  
1026 heavy equipment, how and where archaeological monitors will observe ground-disturbing activities, hand-  
1027 signal or other methods of communication between the archaeological monitor and the equipment operator.  
1028 All approaches to construction equipment and excavations will be conducted only under safe conditions, as  
1029 required by the Occupational Safety and Health Administration (OSHA).

#### 1030 a) Supervisory Monitors and Monitors

1031 Supervisory Monitors and Monitors shall meet the requirements listed above and in PA Stipulation I.B. The  
1032 number of Supervisory Monitors and Monitors which Unicom shall deploy will depend on Unicom’s  
1033 implementation of construction for the project, both within and between communities. In situations where  
1034 multiple Monitors are used at a given Project location, Unicom will ensure that a Supervisory Monitor is  
1035 designated, and that the communication between the On-Site Manager (see below) and Supervisory Monitor  
1036 is clearly established. Consistent with PA Stipulation VI.C, Supervisory Monitors and Monitors are  
1037 authorized to issue a Stop Work Order if human remains or archaeological or historic resources are  
1038 encountered. Supervisory Monitors and Monitors are responsible for completing daily reporting activities  
1039 during monitoring (Exhibit 1: *Cultural Resources Briefing Form* and Exhibit 2: *Daily Monitoring Log*) and  
1040 for recording information about any inadvertent discovery encountered during the monitoring event  
1041 (Exhibit 3: *Cultural Resources Discovery Form*).

1042 In the event that human remains or potentially significant archaeological resources are encountered during  
1043 any ground-disturbing activity associated with the Project, the Supervisory Monitor and/or Monitor will  
1044 immediately issue a Stop Work Order in the area of the discovery and implement Exhibit 4: *Inadvertent*  
1045 *Discovery Procedures Flowchart and CONTACTS*. The Supervisory Monitors will also be responsible  
1046 for recording, documenting, cataloging, and managing any artifacts or features which are discovered or  
1047 recovered during the monitored Project activity.

## 1048           b)     On-Site Manager

1049 For each community location where monitoring will occur, Unicom shall designate an On-Site Manager.  
1050 The On-Site Manager must be intimately familiar with the particular Project activities being conducted at  
1051 the monitoring location; have access to work and crew schedules, contact information for Project managers,  
1052 and Project designs; and be the point of contact for signatories and consulting parties not present where  
1053 construction activities are taking place. The On-Site Manager shall work in close cooperation with the  
1054 Supervisory Monitor to ensure that all ground disturbing activity is monitored. In the event that the  
1055 Supervisory Monitor or a Monitor working under the Supervisory Monitor issues a Stop Work Order  
1056 (consistent with PA Stipulation VI.C), the On-Site Manager is responsible for communicating the order to  
1057 all project personnel involved in ground-disturbing activity. The On-Site Manager will ensure the Stop  
1058 Work Order is enforced until such time that ground-disturbing construction work may proceed consistent  
1059 with the processes outlined in Exhibit 4: *Inadvertent Discovery Procedures Flowchart and CONTACTS*.

## 1060           c)     Tribal Monitors

1061 Unicom, at their sole discretion, may include tribal monitors as part of the Project monitoring activities.  
1062 Tribal monitors do not need to meet the SOI standards described above for Supervisory Monitors or  
1063 Monitors; however, Tribal monitors must work under the direct supervision of a Supervisory Monitor, and  
1064 Tribal monitors do not have authority to unilaterally issue Stop Work Orders.

## 1065           2.     Permitting, Access, and Permissions

1066 Prior to any ground disturbing activities, Unicom and/or their consultants will secure the necessary cultural  
1067 resource investigation and access permits necessary for cultural resource monitoring of Project activities.  
1068 Necessary permits may include:

- 1069           •     OHA State Cultural Resources Investigation Permit
- 1070           •     Permit for Archaeological Investigations issued under the Archaeological Resources Protection Act
- 1071           •     University of Alaska Museum Curation Agreement for artifacts discovered on State of Alaska lands  
1072           (except for lands within the Kodiak Archipelago)
- 1073           •     Alutiiq Museum and Archaeological Repository Curation Agreement for artifacts discovered on  
1074           State of Alaska lands within the Kodiak Archipelago
- 1075           •     Private Landowner Artifact Curation Agreements with private landowners

## 1076           3.     Construction Monitoring Procedures

1077 This portion of the CRMP describes the protocols and procedures to be implemented by the Supervisory  
1078 Monitor for monitoring the Project's ground disturbing activities. All construction monitoring will be  
1079 conducted in compliance with the Project PA and CRMP, and with OHA monitoring guidance (OHA 2018)  
1080 and the SOI Standards for Archaeology (NPS 2015b). The following procedures outline communication  
1081 specifics that will allow for the smooth resolution of any cultural resource matters that arise during Project  
1082 construction. Communication for the Project may include: face-to-face or virtual meetings regarding  
1083 construction and monitoring; routine communication with the Project's On-site manager regarding Project  
1084 schedules and construction drawings and maps; and formal archaeological monitoring paper reports and  
1085 forms.

## 1086           a)     Pre-Construction Cultural Resources Briefing

1087 The Supervisory Monitor will conduct a cultural resource briefing with the On-Site Manager and all on-  
1088 site consultants and subconsultants prior to the start of any ground disturbing activities or as part of Project  
1089 activity safety briefings (Attachment 1). This briefing will be repeated as necessary throughout the duration  
1090 of the Project activity (e.g., crew change outs, change of scope). The Supervisory Monitor will inform the  
1091 construction team (and any other consultants associated with the ground disturbing activities) of the role of

1092 the Supervisory Monitor and briefly summarize the procedures that will be implemented if archaeological  
1093 resources are discovered (e.g., Stop Work Orders).

1094 b) Daily Monitoring Responsibilities

1095 Prior to the commencement of each workday, the Supervisory Monitor will confer with the On-Site  
1096 Manager to discuss the activities planned for the day. The Supervisory Monitor will be on-site to observe  
1097 excavation, trenching, or any other ground disturbing activities, and will document daily observations on  
1098 standardized forms including Exhibit 1: *Cultural Resources Briefing Form*, Exhibit 2: *Daily Monitoring*  
1099 *Log*, and Exhibit 3: *Cultural Resources Discovery Form*. The archaeological monitoring strategy is based  
1100 on the foundational assumption that archaeological monitoring will consist of observing disturbed soils and  
1101 sediments removed from their natural location by excavators, backhoes, chain trenchers, or hand tools.  
1102 Archaeological monitors will observe ground-disturbing construction excavation in all Project areas.

1103 Trench excavation often moves rapidly to minimize slumping and caving of trench sidewalls.  
1104 Archaeological monitors will observe excavation and soil removal from multiple perspectives around and  
1105 in front of working equipment, requiring close communication with construction supervisors and equipment  
1106 operators to ensure safety of all personnel. It is anticipated that large sections of sediments can be viewed  
1107 in profile by the archaeological monitors assigned to each construction activity. If necessary and only when  
1108 safe, the archaeological monitors may enter excavation areas to clean and examine trench walls, obtain  
1109 matrix samples, or record stratigraphy. This will require notifying the equipment operator or other  
1110 construction personnel to halt all heavy equipment operation until the archaeological monitor has cleared  
1111 the excavation area and has given the equipment operator a notice that they can proceed. The archaeological  
1112 monitor(s) will abide by OSHA regulations at all times.

1113 4. Identification, Notification, Recordation, and Evaluation of Discoveries

1114 In the event that the Supervisory Monitor or a Monitor identifies cultural material during Project ground  
1115 disturbing activities, the Supervisory Monitor or Monitor shall issue a Stop Work Order (consistent with  
1116 PA Stipulation VI.C) to halt work in the vicinity of the find in order to confirm and assess the nature of the  
1117 discovery. If the Supervisory Monitor determines that the discovery represents an archaeological deposit,  
1118 historic material, and/or potential historic property (with or without potential human remains), the  
1119 Supervisory Monitor will immediately notify the On-Site Supervisor and implement *Exhibit 4: Inadvertent*  
1120 *Discovery Procedures Flowchart and CONTACTS*.

1121 In general, if the Supervisory Monitor, Monitor, or Tribal Monitor (if present) identifies an artifact, deposit,  
1122 and/or feature (including human remains) during ground-disturbing Project activities, the discovery will  
1123 represent a potentially significant cultural resource and the following steps will be taken:

- 1129 a) The Supervisory Monitor shall issue a Stop Work Order to the On-Site Manager and Project  
1130 personnel, and all construction activities within the area of the discovery will be halted, and  
1131 all surrounding work can resume.
- 1132 b) The Supervisory Monitor or Monitor will stabilize the area of the discovery from further  
1133 disturbance and establish a 100-foot construction buffer around the area of the discovery to  
1134 prevent additional and unintentional disturbance.
- 1135 c) The Supervisory Monitor shall collect only such information as is necessary to provide  
1136 adequate information about the nature of the discovery to consulting parties (e.g., Unicom,  
1137 PA signatory parties, landowner). The information summary shall include the date and time  
1138 of discovery, the approximate extent of cultural material, the degree of integrity, and any  
1139 additional information that would support dialogue between consulting parties. The  
1140 Supervisory Monitor shall record this information using the standardized form included as  
1141 Exhibit 3.
- 1142 d) As soon as practicable following a discovery which does not contain definitive or suspected  
1143 human remains, and no later than within 1 business day, the monitoring archaeologist will  
1144 notify RUS, USACE, SHPO, and the landowner or manager of the discovery
- 1145 (1) If the discovery includes human remains, the Supervisory Monitor shall also notify the  
1146 appropriate law enforcement office (e.g., Village Public Safety Officer, Alaska State  
1147 Troopers) and the Alaska State Medical Examiner, as per AS 12.65.005. Notification  
1148 lists are included in Exhibit 4: *Inadvertent Discovery Procedures Flowchart and*  
1149 **CONTACTS**.
- 1150 e) Consistent with PA Stipulation V: *Cultural Resource Inventory Efforts* and VI: *Resolution of*  
1151 *Adverse Effects*, PA signatories and consulting parties will confer within three (3) business  
1152 days to determine if the discovery represents a potential historic property (i.e., eligible for  
1153 listing on the NRHP), and what avoidance measures of the discovered feature are possible or  
1154 practical to prevent further disturbance to the discovery.
- 1155 (1) If RUS determines through consultation that the discovery is eligible, and SHPO  
1156 concurs, RUS, SHPO, and Unicom shall continue consultation to determine an  
1157 appropriate treatment plan to resolve adverse effects within seven (7) days.
- 1158 (2) If RUS determines through consultation that the discovery is not eligible for the NRHP,  
1159 and SHPO concurs, RUS shall provide Unicom with written notification within 1  
1160 business day that construction activities within the 100-foot buffer may proceed.
- 1161 f) No further ground disturbing work may commence within the 100-foot buffer of the  
1162 discovery until written authorization from RUS and SHPO has been obtained that indicates  
1163 Project activities may proceed in the discovery buffer.

#### 1164 5. Human Remains

1165 Multiple State laws (Alaska Statue [AS] 12.65.005, AS 11.46.482(a)(3), AS 41.35.200, and AS 18.50.250)  
1166 govern the treatment of human remains within the State of Alaska. In the event that human remains are  
1167 encountered at any time during Project ground disturbing activities, the On-Site Manager, Supervisory  
1168 Monitor, and all Project personnel shall ensure that at all times the remains are treated with dignity and  
1169 respect, and that Exhibit 4: *Inadvertent Discovery Procedures Flowchart and CONTACTS* is immediately  
1170 implemented. Project personnel will not take pictures of the remains and will not disclose the contents,  
1171 nature, or location of the discovery to any non-Project persons. The Project shall avoid and minimize the

1167 must be relocated, then Unicom, or consultants hired on their behalf shall obtain required permits from the  
1168 Alaska State Bureau of Vital Statistics and reinter the remains in a designated area.

1169 For human remains found in Larsen Bay or Kodiak only, the Alutiiq Museum will conduct notification as  
1170 the designated Regional Repatriation Coordinator and will therefore be the point of contact for Kodiak area  
1171 Alutiiq tribes.<sup>7</sup>

## 1172 6. Collection and Curation Protocols

1173 Any archaeological or historic resources discovered during the monitoring process are the property of the  
1174 landowner or land manager, and will be recorded, collected, treated for conservation (if necessary), and  
1175 cataloged for curation. Recovered artifact treatment includes both non-perishable and perishable cultural  
1176 resources. Both artifact types can be found in prehistoric, ethnohistoric, or historic deposits. Non-perishable  
1177 artifacts include objects made of stone, bone, shell, metal, ceramic, glass, etc. They may be chemically  
1178 altered, usually on the surface, but retain their integrity as objects. Conservation measures will be guided  
1179 by the Conservation manual for Northern Archaeologists (Prince of Wales Northern Heritage Center 2007).

1180 Perishable artifacts are those that are quickly destroyed by the action of water, oxygen, microbes, or other  
1181 processes when removed from their environments. However, in wet anaerobic environments, they can be  
1182 well-preserved. Archaeological sites with perishable artifacts in wet anaerobic environments are called wet  
1183 sites. Perishable artifacts may be of wood and other plant materials, as well as animal hair and skin. Most  
1184 deposits of perishable artifacts are regarded as a significant resource, precisely because these kinds of  
1185 objects are absent from most dry-land archaeological sites.

1186 Historic artifacts will only be collected and prepared for curation if they are highly unique and show some  
1187 element that is diagnostic (e.g., “maker’s marks, identifiable patterns, serial/model number plates). Such  
1188 objects may include ceramics, glass containers, metal containers, and fragments thereof. Objects that may  
1189 be sampled include most window and bottle glass, nails and wire, plastic, and wood fragments. In wet  
1190 deposits, it may be possible to recover objects of leather, fur, or plant fiber.

1191 All objects that are collected in the field will be bagged. The bags will be labeled with a field specimen  
1192 number and recorded on a field specimen log. Mud adhering to the artifacts will be removed with gentle  
1193 brushing, depending on artifact condition, composition, and type of artifact.

1194 The majority of non-perishable prehistoric artifacts do not require conservation treatment. These materials  
1195 can be bagged, cleaned, and cataloged in the field with minimal effort. If the material is partially  
1196 disintegrated or the object is broken, conservation treatment can repair or limit the damage. Most bone,  
1197 antler, shell, and stone recovered from wet sediments can be air-dried slowly (controlled air-drying) at room  
1198 temperature.

1199 Metal objects that have been in water for an extended time may require chemical treatment to halt corrosion  
1200 and remove encrusted surface buildup. They should be kept in fresh water until a trained conservator can  
1201 evaluate them. Artifacts that lack integrity, such as pieces of basketry or cordage, will be placed in folds of  
1202 fiberglass window screening to reduce further unraveling. Support will be provided as necessary using rigid  
1203 sheets of plastic cut to size. Conservation treatment will be required to stabilize specific perishable artifact  
1204 types.

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<sup>7</sup> Details can be found in the “Kodiak Alutiiq/Sugpiaq Repatriation Manual,” available from [https://alutiiqmuseum.org/images/stories/collections/KASRC\\_Manual.pdf](https://alutiiqmuseum.org/images/stories/collections/KASRC_Manual.pdf)

## 1205 a) Curation Protocols

1206 Any materials<sup>8</sup> collected as a result of implementing this CRMP are the property of the applicable land  
1207 managing agency or landowner. Unicom will assume all costs associated with the cataloging and curation  
1208 of any materials that are collected during the implementation this CRMP, in perpetuity. Curation costs may  
1209 include, but are not limited to, curation fees charged by approved institutions, acquisition of archival  
1210 materials, shipping, cleaning, rehousing, and any other conservation action as determined by a qualified  
1211 conservator.

1212 Unicom, or consultants hired on their behalf, will be responsible for submitting all materials recovered  
1213 within 1 year following completion of the fieldwork that generated the collection. All collections will be  
1214 curation ready. Prior to disposition, Unicom, or consultants hired on their behalf, will safeguard all materials  
1215 from theft or damage by providing adequate interim storage facilities and conservation actions, consistent  
1216 with the requirements in 36 Code of Federal Regulations (CFR) 79.9(b)(4). Within 30 days following  
1217 disposition, Unicom will provide RUS with all accession records and documentation associated with the  
1218 transfer and curation of materials. RUS will share the documentation with other landowners or managers,  
1219 as appropriate.

1220 For collections recovered from private lands, Unicom, or consultants hired on their behalf, will work with  
1221 landowners to execute private landowner curation agreements. Unicom will encourage landowners to  
1222 donate any materials collected on their property to the Museum of the Aleutians, Alutiiq Museum, or the  
1223 Museum of the North. If a landowner chooses to donate or loan the materials to a museum or another  
1224 repository, Unicom will provide for curation of the materials, not to exceed standards set forth in 36 CFR  
1225 79 and provide RUS with documentation of the transfer within 30 days following the transfer. In the event  
1226 that a landowner chooses to retain a collection, Unicom will provide documentation of this decision to RUS.  
1227 If materials collected from private lands are of a traditional religious, spiritual, or cultural importance to  
1228 Tribes, RUS will make a good faith effort to facilitate consultation between the landowner and Tribe(s) to  
1229 reach a resolution for the disposition of the materials; however, this will be negotiated outside of the terms  
1230 of this CRMP.

1231 For collections recovered from Larson Bay, the Alutiiq Museum has agreed to serve as the repository of  
1232 record. Acceptance of any collections will be contingent upon:

- 1233 • written agreement by the owner of the collection,
- 1234 • preparation of the collection for curation in accordance with the standards described above, and
- 1235 • payment in full of the appropriate curation fee.

## 1236 b) Artifact Records

1237 Field records will include artifact catalogs, field forms, stratigraphic drawings, maps, GPS data, and  
1238 photographs. A database for cataloging and data processing will be developed for each location where data  
1239 recovery investigations are conducted. The database should be designed in such a way that the artifact and  
1240 records facilitate seamless and efficient processing from fieldwork to analysis.

1241 Appropriately qualified personnel, some of whom may be different from the field investigators, will  
1242 conduct the analyses. The nature and quantity of the cultural resources that are found will structure the  
1243 analyses.

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<sup>8</sup> The term “materials” is consistent with the definition found at 36 CFR 79.4(a)(1), and refers to any objects, artifacts, specimens, records, or remains associated with historic properties. This includes all documentation generated during the implementation of this PA, with the exception of information that is subject to confidentiality clauses of NHPA, the Archaeological Resources Protection Act, and Alaska State law.

1244 The analysis will produce measurements and descriptions of the morphological, technological, and stylistic  
1245 attributes of all artifacts; material identification; species identifications of selected perishable specimens;  
1246 sample analysis; dating; illustration (drawings and photographs); and distribution within a site or across the  
1247 landscape.

#### 1248 7. Confidentiality

1249 Information collected as a result of consultation, field survey, and the AHRS database are considered to be  
1250 restricted datasets; access to historic, prehistoric, and paleontological site location information in  
1251 repositories such as the AHRS is closed to the general public (as required by Public Law 96-95; AS  
1252 9.25.120(a)(4), and; Policy and Procedure No. 50200).

1253 Information relating to the nature and location of certain archaeological resources is not subject to state  
1254 public disclosure laws or Freedom of Information Act disclosure. Consequently, all cultural resource  
1255 information—including reports and mapping—must be kept restricted and confidential.

1256 Unicom shall require that employees, consultants, and subconsultants keep the discovery of any  
1257 archaeological resources confidential, including but not limited to refraining from contacting the media,  
1258 responding to media questions, or otherwise sharing information regarding the discovery with any member  
1259 of the public.

#### 1260 8. Reporting

1261 Consistent with the terms and conditions of the Project PA, Unicom, or consultants hired on their behalf,  
1262 will prepare plans and reports (“reports”) of activities, including associated site records, and submit them  
1263 to RUS, SHPO, and other consulting parties as necessary to fulfill the terms of the PA. The PA for the  
1264 Project outlines the report submittal and approval process for these reporting efforts.

1265 Implementation of this CRMP will minimally require Unicom to prepare and submit the following reports:

- 1266 • submerged cultural resources evaluation and documentation describing marine route realignments
- 1267 to avoid identified cultural resources (if required);
- 1268 • individual archaeological monitoring reports for the communities of Larsen Bay, Chignik Bay,
- 1269 Sand Point, King Cove, Akutan, and Unalaska.

1270 Consistent with PA stipulation V.C, Unicom or consultants hired on their behalf may prepare and submit  
1271 proposed plans to conduct additional identification work within communities to further refine data  
1272 regarding the location, nature, and extent of cultural resources, in addition to collecting non-intrusive design  
1273 data to inform Unicom’s proposed construction methods within that community. Unicom will also be  
1274 required to submit reports detailing the results and findings of implementing these plans.

1275 Versions of reports redacted at the request of RUS for sensitive information, such as site-specific locations  
1276 and names, may also be distributed to other parties who do not fall under the applicable professional  
1277 qualification standards set forth in SOI Standards and OHA monitoring guidelines (OHA 2018).

##### 1278 a) Monitoring Reporting

1279 Upon completion of the archaeological monitoring in each community, the principal investigator will  
1280 prepare a monitoring report which will be consistent with OHA’s monitoring and reporting standards and  
1281 which will include the following:

- 1282 • Narrative description of the monitoring
- 1283 • Description of any cultural remains encountered
- 1284 • Detailed descriptions of notification and consultation activities undertaken to minimize or mitigate
- 1285 adverse effects (if required)

- 1286 • Completed or updated AHRS forms
- 1287 • Evaluation of sites for eligibility for listing in the NRHP
- 1288 • Assessment of effects of the Project on eligible sites
- 1289 • Maps of the Project area indicating which areas were monitored and locations of sites and cultural
- 1290 features
- 1291 • Photographs that are dated and labeled

1292 9. CRMP Revisions and Amendments

1293 Consistent with PA Stipulation VIII.C, any of the PA Signatories may propose an amendment to this CRMP  
1294 by submitting to RUS a request in writing. If RUS, within seven (7) days and in consultation with the  
1295 amendment proponent, concurs that the amendment improves or updates this CRMP, then RUS will share  
1296 the proposed amendment with other PA Signatories for a 30-day review period and consider all timely  
1297 comments received. If no comments are received at the end of the review period, RUS will move forward  
1298 with the proposed amendment and incorporate it into the CRMP and distribute a copy of the revised CRMP  
1299 to all PA signatories and consulting parties. Consistent with the PA, amendment of the CRMP will not  
1300 require an amendment to the PA.

1301

1302

## 1303 10. References

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1324  
1325

## EXHIBIT 1: CULTURAL RESOURCES BRIEFING FORM



## EXHIBIT 2: DAILY MONITORING LOG

**DAILY MONITORING LOG**

<b>Date:</b>	<b>Project Site Monitored:</b>
<b>Monitor's Name:</b>	
<b>Approximate Field Map Coordinates:</b>	
<b>Arrival Time:</b>	<b>Departure Time:</b>
<b>Weather:</b>	<b>Condition of Project Site:</b>
<b>Project Activities Being Conducted:</b>	
<b>Soil Type:</b>	<b>Excavation Depth:</b>
<b>Cultural Resources Inadvertently Unearthed during Project Activities (Y/N)?</b>	
<b>GPS Points Taken (Y/N)?</b>	
<b>Photographs Taken (Y/N)?</b>	

**Observations and Findings:****GPS Points:****Photograph Numbers:****Signature:**

## EXHIBIT 3: CULTURAL RESOURCES DISCOVERY FORM

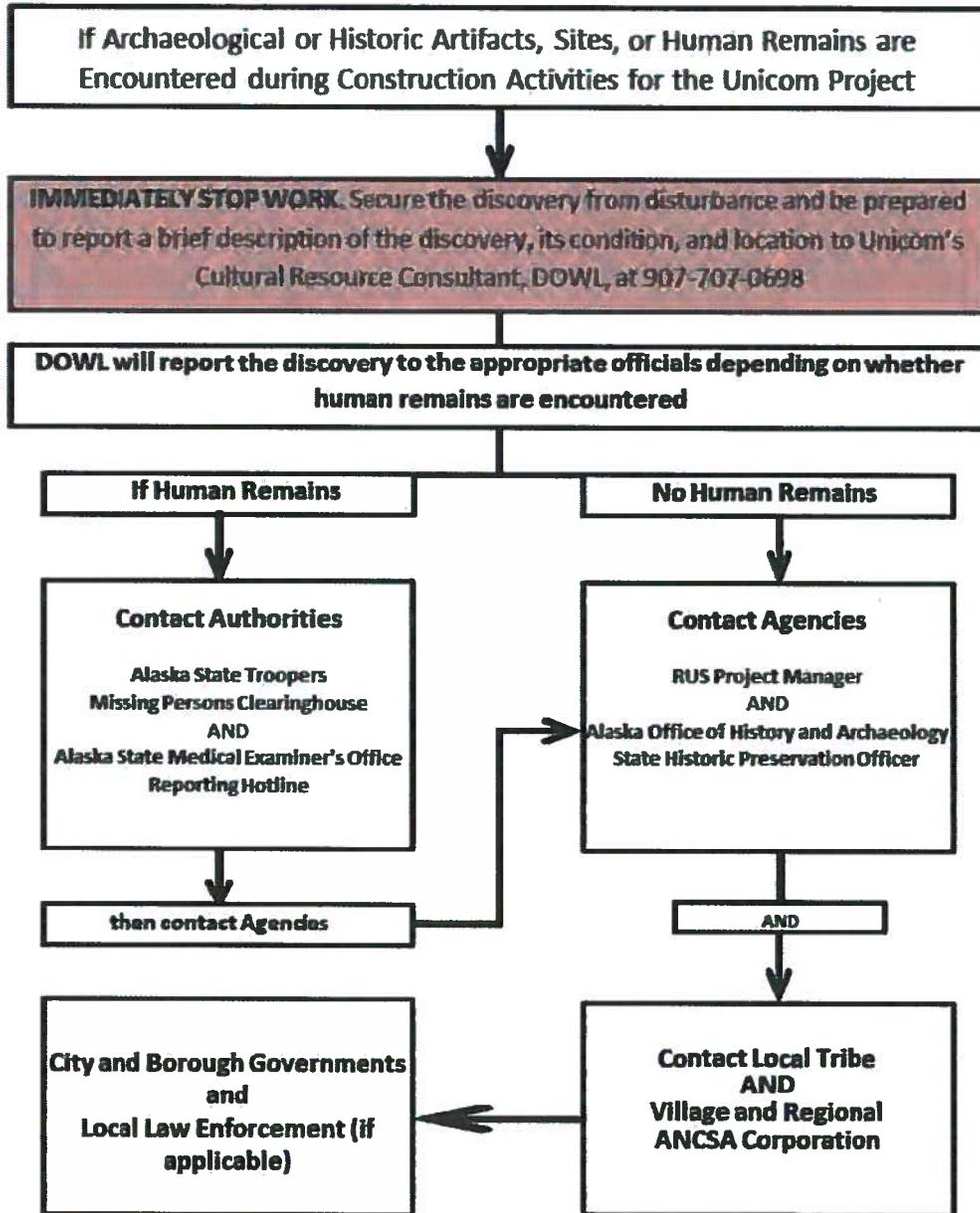
## CULTURAL RESOURCES DISCOVERY FORM

<b>Date and Time of Find:</b>		<b>Project Site:</b>	
<b>Name of Monitor:</b>			
<b>Activity Occurring at Time of Discovery:</b>			
<b>Was Work Halted (Y/N)?</b>			
<b>Date and Time Work Halted:</b>		<b>Date and Time Work Resumed:</b>	
<b>Was Buffer Zone Established (Y/N)?</b>		<b>Size of Buffer Zone:</b>	
<b>Name of Person Documenting Find:</b>			
<b>GPS Points Taken (Y/N)?</b>			
<b>GPS Coordinates:</b>			
<b>Photographs Taken (Y/N)?</b>			
<b>Photograph Numbers:</b>			
<b>Is the Find Human Remains or Associated Funerary Objects (Y/N)?</b>			
<b>Is the Find Cultural Resources (Y/N)?</b>			
<b>Is the discovery an Isolated find (Y/N)?</b>			
<b>Who was Notified of the Find?</b>			

**Detailed Description of Find:**

**EXHIBIT 4: INADVERTENT DISCOVERY PROCEDURES FLOWCHART AND  
CONTACTS BY COMMUNITY (6)**

### INADVERTENT DISCOVERY AND HUMAN REMAINS FIELD PROCEDURES



CONTACT INFO AND DETAILED STEPS PROVIDED ON REVERSE SIDE

**INADVERTENT DISCOVERY AND HUMAN REMAINS FIELD PROCEDURES****For Unicom Field Personnel and On-Site Supervisors**

**IF YOU ENCOUNTER ARCHAEOLOGICAL OR HISTORIC RESOURCES (INCLUDING HUMAN REMAINS) WHILE IN THE FIELD, IMMEDIATELY STOP WORK AND FOLLOW THESE STEPS:**

- Stop all work in the area of the discovery, and take the necessary measures to secure a 100-foot radius buffer around the resource(s) with high visibility flagging or staking
- Immediately notify DOWL at (907)-707-0698 and report as much of the following information of the discovery as possible, including:
  - c Description and photographs of the discovery (is it an artifact/site/structure/burial etc.)
  - c The location of the discovery (GPS coordinates and general location in the Project area)
  - c A general assessment of the condition of the discovery (is it damaged, is it preserved, are there any immediate threats to the preservation of the discovery including erosion or human activities)
- Keep location information confidential, do not share with other contractors that are not directly working at the site, and do not resume work in the area until directed by a Unicom supervisor.

**For DOWL Staff and Archaeological Monitors**

**UPON NOTIFICATION THAT ARCHAEOLOGICAL OR HISTORIC RESOURCES (INCLUDING HUMAN REMAINS) HAVE BEEN ENCOUNTERED, IMMEDIATELY FOLLOW THESE STEPS AND LOG CONTACT ATTEMPTS TO THE INADVERTENT DISCOVERY NOTIFICATION FORM:**

- If the resources encountered include human remains, you are legally obligated to immediately contact the Alaska State Troopers Missing Persons Clearinghouse at (907) 269-5038 and the Alaska State Medical Examiner's Office Reporting Hotline (907) 334-2200 and provide them with any information they request.
  - They may request that a qualified archaeologist assess the age of the remains, or they may send an officer of the peace to examine the remains.
- If no human remains are present, contact RUS, SHPO, the local Tribe, ANCSA Corporations, and City and Borough Governments.
  - For RUS call Alexandria Anderson at (202)-301-9141
  - For the Alaska State Historic Preservation Officer (SHPO-Judith Bünner) or Richard VanderHoek at the Office of History and Archaeology (OHA) in Anchorage call (907)-269-8721 or (907)-269-8700
  - Contact the local Tribe
  - Contact the Village and regional ANCSA Corporations
  - Contact the City and Borough Governments and local law enforcement (if applicable)
- Provide each contact the following information:
  - A brief description of the project-related activity that encountered the discovery
  - A description of the resources encountered, their current condition, and the protective measures used to safely secure the resource from any anticipated disturbances
- Follow the steps outlined in the Cultural Resources Management Plan for additional steps regarding inadvertent discoveries.

**FLOW CHART PROVIDED ON REVERSE SIDE**

**AU Aleutians Project Cultural Resources Monitoring Notification Form-****AKUTAN**

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
Judith Bittner, State Historic Preservation Officer	907-269-8715	judith.bittner@alaska.gov		
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Native Village of Akutan</b>				
Joe Bereskin, President	907-698-2300	qigiigun.tribe@outlook.com		
<b>Akutan Corporation</b>				
Josephine Shangin, President	907-698-2206	jpa_s@hotmail.com		
<b>Aleut Corporation</b>				
Sharon Lind, Chairman	907-561-4300	info@aleutcorp.com		
<b>Aleutian Pribilof Islands Association</b>				
Bruce Wright, APAI NALEM Project Manager	907-276-2700	apiai@apiai.org		
<b>Aleutians East Borough</b>				
Alvin D. Osterback, Mayor	907-383-2699	aosterback@aeboro.org		
<b>City of Akutan</b>				
Joe Bereskin, Mayor	907-698-2228	tuna.scanlan@akutanak.us		
<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				
Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		

<b>Alaska State Medical Examiner's Office</b>				
907-334-2200 (open 24 hrs)				
Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907-334-2202	ann.waisanen@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
907-269-8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b>				
907-465-5423 F: 907-465-3423				

## AU Aleutians Project Cultural Resources Monitoring Notification Form- CHIGNIK BAY

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
Judith Bittner, State Historic Preservation Officer	907-269-8715	judith.bittner@alaska.gov		
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Chignik Bay Tribal Council</b>				
Roderick Carlson, President	907-749-2445	cbaytc@aol.com		
<b>Far West, Incorporated (ANCSA Village Corporation)</b>				
Marit Carlson-Van Dort, President & CEO	907-276-2580	info@farwest.com		
<b>City of Chignik Bay</b>				
Guy Ashby, Mayor	907-749-2280	chignikcityclerk@gmail.com		
<b>Bristol Bay Native Corporation</b>				
Jason Metrokin, President and CEO	907-278-3602			
<b>Bristol Bay Native Association</b>				
Anthony Gregorio, Chairman	907-842-5257	contact@bbna.com		
<b>Lake and Peninsula Borough</b>				
Kate Conley, Borough Clerk	907-246-3421	kateconley@lakeandpen.com		
<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				
Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		

<b>Alaska State Medical Examiner's Office</b> 907-334-2200 (open 24 hrs)				
Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Stephen Hoage, Operations Administrator	907-334-2202	stephen.hoage@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b> 907-269-8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b> 907-465-5423 F: 907-465-3423				

## AU Aleutians Project Cultural Resources Monitoring Notification Form- KING COVE

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
Judith Bittner, State Historic Preservation Officer	907-269-8715	judith.bittner@alaska.gov		
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Agdaagux Tribe of King Cove</b>				
Etta Kuzakin, President	907-497-2948	ettakuzakin@yahoo.com atc@arctic.net		
<b>Aleut Corporation</b>				
Sharon Lind, Chairman	907-561-4300	info@aleutcorp.com		
<b>Aleutian Pribilof Islands Association</b>				
Bruce Wright, APAI NALEM Project Manager	907-276-2700	apiai@apiai.org		
<b>Aleutians East Borough</b>				
Alvin D. Osterback, Mayor	907-383-2699	aosterback@aeboro.org		
<b>City of King Cove</b>				
Henry Mack, Mayor	907-497-2340	cityclerk@kingcoveak.org		
<b>King Cove Corporation, Inc.</b>				
Dean Gould	907-497-2312	dellat@arctic.net		

<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				
Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		
<b>Alaska State Medical Examiner's Office</b> 907-334-2200 (open 24 hrs)				
Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Stephen Hoage, Operations Administrator	907-334-2202	stephen.hoage@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b> 907-269-8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b> 907-465-5423 F: 907-465-3423				

## AU Aleutians Project Cultural Resources Monitoring Notification Form-

### LARSEN BAY

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
Judith Bittner, State Historic Preservation Officer	907-269-8715	judith.bittner@alaska.gov		
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Native Village of Larsen Bay</b>				
Richard Henson, President	907-847-2207	larsenbay@gmail.com		
<b>City of Larsen Bay</b>				
David Harmes	907-847-3017	cityoflarsenbay@gmail.com		
<b>Kodiak Island Borough</b>				
Bill Roberts, Borough Mayor	907-486-9300	bill.roberts@kibassembly.org		
<b>Koniag, Inc.</b>				
Shauna Hegna	907-486-2530	sheгна@koniaq.com		
<b>Alutiiq Museum and Archaeological Repository</b>				
Molly Odell, Archaeologist	844-425-8844	molly@alutiiqmuseum.org		
<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				
Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		
<b>Alaska State Troopers, Kodiak Post</b> 907-486-4121				
<b>Alaska State Medical Examiner's Office</b>				

<b>907-334-2200 (open 24 hrs)</b>				
Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Stephen Hoage, Operations Administrator	907-334-2202	stephen.hoage@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b> 907-269-8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b> 907-465-5423 F: 907-465-3423				
<b>Alutiiq Museum and Archaeological Repository</b>				
Molly Odell, Archaeologist	844-425-8844	molly@alutiiqmuseum.org		

## AU Aleutians Project Cultural Resources Monitoring Notification Form- SAND POINT

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
Judith Bittner, State Historic Preservation Officer	907-269-8715	judith.bittner@alaska.gov		
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Qagan Tayagungin Tribe of Sand Point</b>				
Alvin Osterback Jr., President	907-383-5616	osterback.d@gmail.com		
<b>City of Sand Point</b>				
Jim Smith, Mayor	907-383-2698	sptmayor@arctic.net		
<b>Aleut Corporation</b>				
Sharon Lind, Chairman	907-561-4300	info@aleutcorp.com		
<b>Aleutian Pribilof Islands Association</b>				
Bruce Wright, APAI NALEM Project Manager	907-276-2700	apiai@apiai.org		
<b>Aleutians East Borough</b>				
Alvin D. Osterback, Mayor	907-383-2699	aosterback@aeboro.org		
<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				
Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		
<b>Alaska State Medical Examiner's Office</b> 907-334-2200 (open 24 hrs)				

Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Stephen Hoage, Operations Administrator	907-334-2202	stephen.hoage@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b> 907-269-8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b>	907-465-5423	F: 907-465-3423		

## AU Aleutians Project Cultural Resources Monitoring Notification Form- UNALASKA

Date and Time of Discovery: \_\_\_\_\_

Name of Cultural Resource Project Archaeologist: \_\_\_\_\_

Contact Name and Affiliation	Phone	Email	Date	Time
<b>USDA, Rural Utilities Service</b>				
Alexandria Anderson, Anthropologist	202-401-9141	alexandria.anderson@usda.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
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Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728	richard.vanderhoek@alaska.gov		
<b>U.S. Army Corps of Engineers</b>				
Benjamin Soiseth, Southeast Section Chief	907-753-2670	benjamin.n.soiseth@usace.army.mil		
<b>National Park Service</b>				
Janet Clemens, Historian	907-644-3461	janet_clemens@nps.gov		
<b>Unicom, Inc.</b>				
Sharee Tserlentakis, Manager Permitting and Compliance	907-868-8567	smarin@gci.com		
<b>DOWL</b>				
Jake Anders, Cultural Resource Manager	907-707-0698	janders@dowl.com		
Emily Creely, Project Manager	907-865-1216	ecreely@dowl.com		
<b>Qawalangin Tribe of Unalaska</b>				
Chris Price	907-581-2920	chris@qawalangin.com		
<b>Ounalashka Corporation</b>				
Vincent Tutiakoff Sr.	907-581-1276	info@ounalashka.com rankin@ounalashka.com		
<b>City of Unalaska</b>				
Blakeley Roger	907-581-1297	rblakeley@ci.unalaska.ak.us		
<b>Aleut Corporation</b>				
Sharon Lind, Chairman	907-561-4300	info@aleutcorp.com		
<b>Aleutian Pribilof Islands Association</b>				
Bruce Wright, APAI NALEM Project Manager	907-276-2700	apiai@apiai.org		
<b>Human Remains Contacts</b>				
<b>Alaska State Troopers, Missing Persons Clearinghouse</b> 907-269-5038				

Lt. Paul Fussey	907-269-5682	paul.fussey@alaska.gov		
Malia Miller	907-269-5038	malia.miller@alaska.gov		
<b>Alaska State Medical Examiner's Office</b>				
907-334-2200 (open 24 hrs)				
Dr. Gary Zientek, Chief Medical Examiner	907-334-2200	gary.zientek@alaska.gov		
Stephen Hoage, Operations Administrator	907-334-2202	stephen.hoage@alaska.gov		
<b>Alaska Office of History and Archaeology/SHPO</b>				
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Richard VanderHoek, State Archaeologist/Deputy SHPO	907-269-8728 907-269-8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
<b>Health Analytics and Vital Records</b>	907-465-5423	F: 907-465-3423		

