

Appendix L – Section 106 Consultation

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ACHP Consultation

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From: [Andrew Bielakowski](#)
To: ["e106@achp.gov"](mailto:e106@achp.gov)
Cc: [Herring, McKenzie S \(DNR\)](#); [Brooke Therrien](#)
Subject: Electronic Section 106 Documentation Submittal - NTIA/Doyon - Proposed Alaska FiberOptic Project...
Date: Tuesday, February 6, 2024 3:47:08 PM
Attachments: [20240206_NTIA_TBCP_Doyon_ACHP_PA_Invitation_Letter_Alaska_FiberOptic_Project.pdf](#)
[20240206_NTIA_TBCP_Doyon_ACHP_e106_Form_Alaska_FiberOptic_Project_FINAL.pdf](#)

[External]

Pursuant to Section 106 of the National Historic Preservation Act, the National Telecommunications and Information Administration (NTIA) is providing documentation to introduce the Advisory Council on Historic Preservation (ACHP) to a proposed project and invite the ACHP to participate in the Section 106 consultation process via Programmatic Agreement (36 CFR 800.14(b)(3)). Attached please find a cover letter and a summary of pertinent facts in the ACHP e106 Form with associated record. If you need any further information regarding this matter, please feel free to contact me by email or phone.

Very respectfully,
Andy

Andrew Bielakowski

**Environmental Program Officer
Office of Internet Connectivity and Growth
National Telecommunications and Information Administration (NTIA)**

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

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UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

February 6, 2024

Transmitted via email to: jloichinger@achp.gov

Ms. Jaime Loichinger, Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation (ACHP)
Old Post Office Building
1100 Pennsylvania Avenue NW, Suite 809
Washington, D.C. 20004

Subject: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project) funded by a grant from the National Telecommunications and Information Administration's Tribal Broadband Connectivity Program.

Dear Ms. Loichinger:

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (Figure 1).

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to inform ACHP that the Project is being federally funded, environmental and permitting activities are under way, and to invite ACHP's participation in the Section 106 process and as a Signatory to the Programmatic Agreement (PA) currently in preparation.

Consultation letters are being drafted to send to Project stakeholders—federal and state agencies, the Alaska State Historic Preservation Office, Alaska Native Corporations, local and Tribal governments, and other organizations. The letter will notify them about the Project and invite their participation in the Section 106 process, as well as solicit information and concerns about known, or currently unrecorded cultural resources that might be affected by the Project. A list of parties identified as having an interest in this Project is attached to this letter.

Project Description

The Project is divided into two corridors: a terrestrial corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a river corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The river corridor includes all proposed activities within the river as well as an overland Canyon Bypass that avoids the Rampart Rapids.

The Project will be completed in two phases over 2024 and 2025. The majority of the FOC will be installed during 2024 and includes a portion of the terrestrial corridor, the river corridor between Beaver and Tanana, and the Canyon Bypass corridor. The FOC between Fort Yukon and Beaver, and remainder of the terrestrial corridor will be completed during the summer of 2025.

The terrestrial portion of the Project starts in Fairbanks and continues north to the crossing over the Yukon River, terminating on the north side of the E.L. Patton Bridge (132 miles). Installation of the FOC uses a variety of methods all located primarily within the existing highway right-of-way (ROW) managed by the Alaska Department of Transportation and Public Facilities (DOT&PF). The FOC will be strung on an existing pole line for the first 20 miles and will then transition below ground where clearing, vibratory plowing, and trenching will be used to directly bury the cable below the surface. Horizontal directional drilling (HDD) will be used, as necessary, at creek and roadway crossings.

The riverine portion of the Project starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (316 miles). All in-water work will be completed from a self-propelled, self-contained cable-lay barge supported by smaller support skiffs. A scratch plow will be used between Beaver and Tanana and a jet plow will be used between Fort Yukon and Beaver to bury the FOC within the riverbed.

Within each community, a beach manhole (BMH) and a communications shelter will be placed within the existing utility easement or other designated location. Once the FOC leaves the BMH, it will be strung on existing poles aboveground with minimal ground disturbance anticipated.

A Canyon Bypass is proposed between the communities of Rampart and Tanana to bypass the Rampart Rapids (20 miles). Conventional vibratory plowing will primarily be used to install the FOC in the Canyon Bypass corridor, and HDD will be used to cross under any streams along the alignment. A BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River.

Area of Potential Effect

The Area of Potential Effect (APE) for the terrestrial portions of the Project is centered on the FOC installation alignment centerline with a 30-foot buffer either side of the alignment, 60 feet wide in total. The

APE for riverine installation of FOC in the Yukon River is centered on the FOC burial in the bed of the river, with a 100-foot buffer either side of the centerline, 200 feet wide in total. The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link: [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](https://arcgis.com).

Identification Efforts

To date, two cultural resource literature reviews have been completed. The first literature review examined the terrestrial corridor from Fairbanks to the E.L. Patton Yukon River Bridge; the second examined the riverine corridor from the Yukon River bridge upstream to Fort Yukon and downstream to Tanana, including the Canyon Bypass around the Yukon River's Rampart Rapids. The executive summary from both reports is attached.

The cultural resources review for the terrestrial portion of the Project from Fairbanks to the Yukon River identified ten sites on the National Register of Historic Places (NRHP) listed as eligible, treated as eligible, or contributing sites that intersect with or are within ten feet of the FOC alignment and within the 60-foot-wide APE. The review recommended minor re-alignments to minimize possible impacts to historic properties and to avoid some areas that had not been previously surveyed. Those design changes are currently undergoing engineering review. Since ground disturbance to bury the FOC by trenching or HDD will take place within the previously disturbed DOT&PF ROW, the ROW has been surveyed for cultural resources for multiple projects in the past, and other small portions of the route exhibit low probability to have archaeological resources, known cultural resources and NRHP listed or eligible sites are expected to be avoided. Additionally, the Project will not be introducing any new intrusive visual elements that could affect architectural history properties.

The cultural resources review for the riverine portion of the Project included all five communities and the 20-mile Canyon Bypass that generally parallels land south of the Yukon River. No cultural resource surveys have been completed within the vicinity of the Canyon Bypass. A probability analysis was completed, and results identified a large portion of the Canyon Bypass having a medium/high probability to have archaeological resources. The Canyon Bypass corridor will be surveyed for cultural resources prior to installing the FOC.

Within each community, the FOC will be brought to shore via horizontal directional drilling (HDD). A beach manhole (BMH) and a communications shelter will be permanently placed within each community. At Fort Yukon, the FOC will be brought on shore from the Yukon River at a location that has been surveyed in the past, and there are no historic properties present. At Beaver, the FOC will be brought to shore at a previously disturbed location where earlier surveys did not identify any cultural resources. Stevens Village has been surveyed for a number of infrastructure projects in the past; no historic properties have been identified. At Rampart, the FOC will come ashore within the Rampart Historic District (49-TAN-00008), which has not been recorded in detail, although the BMH and communications shelter will be installed on previously disturbed land. At Tanana, the FOC will come ashore in the vicinity of Tanana FAA Station District (49-TAN-00056), where all the district elements in the immediate vicinity of the BMH and communications shelter have been demolished or removed. Placement of the FOC on the E.L. Patton Bridge (49-TAN-00455) across the Yukon River will not alter its continuous orthotropic beam, twin box girder design, nor its instream piers or decking. After installation of the FOC, the bridge will retain its integrity of location, design, setting,

February 6, 2024

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feeling, and association resulting in no adverse effect to the integrity of the properties which make the bridge NRHP eligible.

Conclusion

Pursuant to ACHP's regulations implementing Section 106 of the NHPA, NTIA is providing you an opportunity to comment and invite participation in our Section 106 process via Programmatic Agreement (36 CFR 800.14(b)(3)). Communications may be emailed to me at Andrew.Bielakowski@firstnet.gov. If mail is your preferred method of communication, kindly send a copy to Owl Ridge Natural Resource Consultants, Inc., 4060 B Street, Suite 200, Anchorage, Alaska 99503, Attention: Brooke Therrien (btherrien@owlridgenrc.com). Owl Ridge is working under contract to Doyon to prepare the required environmental documents and permits for the Project. Please do not hesitate to contact me if you have any questions or concerns about the Project.

Best regards,

Andrew Bielakowski

Andrew.Bielakowski@firstnet.gov

Environmental Program Officer

Office of Internet Connectivity and Growth

National Telecommunications and Information Administration

202-657-7982 mobile

Enclosures:

Figure 1. Alaska FiberOptic Project Location

Distribution List



- | | |
|--------------------------------|-------------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | ~ Scratch Plow |
| ▬ Parks, Preserves and Refuges | ~ Canyon Bypass (Terrestrial) |
| ▬ Highway | ~ Jet Plow |
| | ~ Terrestrial |



DEPLOYCOM, LLC

ALASKA FIBEROPTIC PROJECT PROJECT LOCATION MAP

ALASKA FIBEROPTIC PROJECT

SCALE: 0 5 10 20 Miles
0 10 20 40 Kilometers

FIGURE: 1

DEPLOYCOM_0080.aprx, 2/6/2024 11:02 AM, R01

Distribution List

State and Federal Agencies (9)	
Advisory Council on Historic Preservation (ACHP)	Signatory
Alaska Department of Fish and Game (ADFG)	Invited Signatory
Alaska Department of Natural Resources (DNR)	Invited Signatory
Alaska Department of Transportation and Public Facilities (DOT&PF)	Invited Signatory
Alaska State Historic Preservation Officer (SHPO)	Signatory
Bureau of Land Management (BLM)	Signatory
National Telecommunications and Information Administration (NTIA)	Signatory
U.S. Army Corps of Engineers (USACE)	Signatory
U.S. Fish & Wildlife Service (USFWS)	Invited Signatory
Federally Recognized Tribes (6)	
Beaver Village Council	Concurring Party
Gwitchyaa Zhee Gwich'in Tribal Government (GZGTG)	Concurring Party
Native Village of Minto	Concurring Party
Rampart Tribal Council	Concurring Party
Stevens Village Council	Concurring Party
Tanana Tribal Council	Concurring Party
ANCSA Corporations and Non-Profit Tribal Corporations (10)	
Baan-O-Yeel Kon Corporation (BOYK)	Concurring Party
Beaver Kwitich'in Corporation	Concurring Party
Council of Athabascan Tribal Governments (CATG)	Concurring Party
Dinyea Corporation	Concurring Party
Doyon, Limited (Doyon)	Signatory
Fairbanks Native Association (FNA)	Concurring Party
Gwitchyaa Zhee Corporation	Concurring Party
Seth-De-Ya-Ah Corporation	Concurring Party
Tanana Chiefs Conference (TCC)	Concurring Party
Tozitna, Limited	Concurring Party
City and Borough Governments (4)	
City of Fairbanks	Concurring Party
City of Fort Yukon	Concurring Party
City of Tanana	Concurring Party
Fairbanks North Star Borough	Concurring Party
Other (3)	
DeployCom	Invited Signatory
University of Alaska Museum of the North (UAMN)	Concurring Party
Yukon-Tanana Historical Society	Concurring Party



Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: *e106@achp.gov*

I. Basic information

- 1. Name of federal agency** (If multiple agencies, state them all and indicate whether one is the lead agency):

National Telecommunications and Information Administration (NTIA) – Lead Agency
Bureau of Land Management – Cooperating Agency
U.S. Army Corps of Engineers – Cooperating Agency
National Marine Fishes Service – Cooperating Agency

- 2. Name of undertaking/project** (Include project/permit/application number if applicable):

Alaska FiberOptic Project

NTIA grant to Doyon, Limited: Federal Award No. NT22TBC0290063, dated August 26, 2022

- 3. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

The project initiates in Fairbanks, Alaska and extends northerly, following the Alaska Department of Transportation and Public Facilities (DOT&PF) right-of-way (ROW) along the Steese, Elliott, and Dalton highways to the E.L. Patton Bridge across the Yukon River. Construction will then transition to the Yukon River and extend upriver to the communities of Fort Yukon, Beaver, and Stevens Village and downriver to the communities of Rampart and Tanana. All these communities are located in the interior region of Alaska. Between the communities of Rampart and Tanana, a 20-mile Canyon Bypass corridor is planned overland south of the Yukon River. The bypass is required to avoid the Rampart Rapids.

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project an online web mapper has been developed to display the proposed Area of Potential Effect (APE). The web mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(aregis.com\)](http://aregis.com).

The proposed undertaking would not affect historic properties located on tribal lands.

4. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Andrew Bielakowski
Environmental Program Officer

Office of Internet Connectivity and Growth
National Telecommunications and Information Administration

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

5. Purpose of notification.

The purpose of this notice is to inform the Advisory Council on Historic Preservation (ACHP) that the Project has been funded, environmental and permitting activities are under way, and to invite ACHP's participation in the Section 106 process and as a Signatory to the Programmatic Agreement (PA) currently in preparation.

II. Information on the Undertaking*

6. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (Figure 1).

The Project is divided into two corridors: a terrestrial corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a river corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The river corridor includes all proposed activities within the river as well as an overland Canyon Bypass route that avoids the Rampart Rapids.

The Project will be completed in two phases over 2024 and 2025. The majority of the FOC will be installed during 2024 and includes a portion of the terrestrial corridor, the river corridor between Beaver and Tanana, and the Canyon Bypass corridor. The FOC between Fort Yukon and Beaver, and remainder of the terrestrial corridor will be completed during the summer of 2025.

The terrestrial portion of the Project starts in Fairbanks and continues north to the crossing over the Yukon River, terminating on the north side of the E.L Patton Bridge (132 miles). Installation of the FOC uses a variety of methods all located primarily within the existing highway right-of-way managed by the Alaska Department of Transportation and Public Facilities. The FOC will be strung on an existing pole line for the first 20 miles and will then transition below ground where clearing, vibratory

plowing, and trenching will be used to directly bury the cable below the surface. Horizontal directional drilling (HDD) will be used, as necessary, at creek and roadway crossings.

The riverine portion of the Project starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (316 miles). All in-water work will be completed from a self-propelled, self-contained cable-lay barge supported by smaller support skiffs. A scratch plow will be used between Beaver and Tanana and a jet plow will be used between Fort Yukon and Beaver to bury the FOC within the riverbed.

Within each community, a beach manhole (BMH) and a communications shelter will be placed within the existing utility easement or other designated location. Once the FOC leaves the BMH, it will be strung on existing poles aboveground with minimal ground disturbance anticipated.

A 20-mile Canyon Bypass is proposed between the communities of Rampart and Tanana to bypass the Rampart Rapids. Conventional vibratory plowing will primarily be used to install the FOC in the Canyon Bypass corridor, and HDD will be used to cross under any streams along the alignment. A BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River.

Permits and consultation from other federal agencies is required and includes the following:

Table 1.

Agency	Permit / Authorization	Involvement
U.S. Department of the Interior, Bureau of Land Management	Standard Form 299	BLM manages lands where the FOC will be installed.
U.S. Army Corps of Engineers (USACE)	Clean Water Section 404 / Section 10	USACE regulates dredge and fill impacting wetlands and waters of the U.S.
National Marine Fisheries Service (NMFS)	Essential Fish Habitat (EFH) Consultation	NMFS regulates potential impacts to Essential Fish Habitat

7. Describe the Area of Potential Effects:

The APE for direct effects is the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the undertaking. APEs are defined appropriate to the design of the FOC location and methods for installation.

The APE for the terrestrial portions of the Project is centered on the FOC installation alignment centerline with a 30-foot buffer either side of the alignment, 60 feet wide in total. The APE for river corridor installation of FOC in the Yukon River is centered on the FOC burial in the bed of the river, with a 100-foot buffer either side of the centerline, 200 feet wide in total.

The APE for visual effects is the geographic area in which the undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP). The Project will not introduce any new visual elements as the Project FOC will be buried at most terrestrial and river locations. Within communities, the installation of BMHs and communication shelters will occur at locations where no visual impacts to historic properties will occur. The FOC will be strung on existing utility poles within communities, which will not add a significant visual effect to any historic properties.

Due to the large geographic area of the proposed Project an online web mapper has been developed to display the proposed APE. The web mapper is available at the link provided above.

8. Describe steps taken to identify historic properties:

To date, two cultural resource literature reviews have been completed. The first literature review examined the terrestrial corridor from Fairbanks to the E.L. Patton Yukon River Bridge; the second examined the riverine corridor from the Yukon River bridge upstream to Fort Yukon and downstream to Tanana, including the Canyon Bypass around the Yukon River's Rampart Rapids. The executive summary from both reports is attached.

The cultural resources review for the terrestrial portion of the Project from Fairbanks to the Yukon River identified ten sites on the National Register of Historic Places (NRHP) listed as eligible, treated as eligible, or contributing sites that intersect with or are within ten feet of the FOC alignment and within the 60-foot-wide APE. The review recommended minor re-alignments to minimize possible impacts to historic properties and to avoid some areas that had not been previously surveyed. Those design changes are currently undergoing engineering review. Since ground disturbance to bury the FOC by trenching or HDD will take place within the previously disturbed DOT&PF ROW, the ROW has been surveyed for cultural resources for multiple projects in the past, and other small portions of the route exhibit low probability to have archaeological resources, known cultural resources and NRHP listed or eligible sites are expected to be avoided. Additionally, the Project will not be introducing any new intrusive visual elements that could affect architectural history properties.

The cultural resources review for the riverine portion of the Project included all five communities and the 20-mile Canyon Bypass that generally parallels land south of the Yukon River. No cultural resource surveys have been completed within the vicinity of the Canyon Bypass. A probability analysis was completed, and results identified a large portion of the Canyon Bypass having a medium/high probability to have archaeological resources. The Canyon Bypass corridor will be surveyed for cultural resources prior to installing the FOC.

Within each community, the FOC will be brought to shore via HDD. A BMH and a communications shelter will be permanently placed within each community. At Fort Yukon, the FOC will be brought on shore from the Yukon River at a location that has been surveyed in the past, and there are no historic properties present. At Beaver, the FOC will be brought to shore at a previously disturbed location where earlier surveys did not identify any cultural resources. Stevens Village has been surveyed for a number of infrastructure projects in the past; no historic properties have been identified. At Rampart, the FOC will come ashore within the Rampart Historic District (49-TAN-00008), which has not been recorded in detail, although the BMH and communications shelter will be installed on previously disturbed land. At Tanana, the FOC will come ashore in the vicinity of Tanana FAA Station District (49-TAN-00056), where all the district elements in the immediate vicinity of the BMH and communications shelter have been demolished or removed. Placement of the FOC on the E.L. Patton Bridge (49-TAN-00455) across the Yukon River will not alter its continuous orthotropic beam, twin box girder design, nor its instream piers or decking. After installation of the FOC, the bridge will retain its integrity of location, design, setting, feeling, and association resulting in no adverse effect to the integrity of the properties which make the bridge NRHP eligible.

9. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Doyon's subcontractors have completed two cultural resource inventory and evaluation reports based on existing literature. The executive summaries from each of the cultural resources literature reviews are attached.

The historic properties (NRHP-listed, eligible, or treated as eligible) identified by the two cultural resource literature reviews are described in the two reports. Each report recommended minor, feasible design changes to eliminate, reduce or avoid adverse impacts to those historic properties. Those recommendations have been implemented by making FOC location changes, or FOC installation method changes.

There are no National Historic Landmarks (NHL) within the Project APE.

10. Describe the undertaking's effects on historic properties:

As described above (9.) and in the cultural resource literature review, adverse effects to historic properties in the Fairbanks to Yukon River bridge FOC alignment were mitigated by FOC location changes or FOC installation methods in the DOT&PF ROW.

Within each of the five Yukon River communities the FOC will be brought to shore via HDD. A BMH and a communications shelter will be permanently placed within each community. At Fort Yukon, the FOC will be brought on shore from the Yukon River at a location that has been surveyed in the past, and there are no historic properties present. At Beaver, the FOC will be brought to shore at a previously disturbed location where earlier surveys did not identify any cultural resources. Stevens Village has been surveyed for a number of infrastructure projects in the past; no historic properties have been identified. At Rampart, the FOC will come ashore within the Rampart Historic District (49-TAN-00008) which has not been recorded in detail. The BMH and communications shelter will be installed on previously disturbed land.

At Tanana, the FOC will come ashore in the vicinity of Tanana FAA Station District (49-TAN-00056), where all the district elements in the immediate vicinity of the BMH and communications shelter have been demolished or removed. Placement of the FOC on the E.L. Patton Bridge (49-TAN-00455) across the Yukon River will not alter its continuous orthotropic beam, twin box girder design, nor its instream piers, or its decking. After installation of the FOC, the bridge will retain its integrity of location, design, setting, feeling, and association which results in no adverse effect to the integrity of the properties which make the bridge NRHP eligible.

11. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

As discussed above, the Project will not adversely affect any known historic property/NHL. Based on the results of the planned Canyon Bypass route cultural resources survey, any identified cultural resources will be described and evaluated for NRHP-eligibility, and a treatment plan based on the PA and Cultural Resources Management Plan (CRMP) will be implemented.

12. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

Doyon's consultant and NTIA are initiating consultation with various interested parties, such as the Alaska SHPO, BLM, local organizations and governments, and federally recognized tribes. Results of those consultations will be addressed in a project specific PA which includes a CRMP.

III. Optional Information

13. Please indicate the status of any consultation that has occurred to date. Are there any consulting parties involved other than the SHPO/THPO? Are there any outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation?

As discussed above, Doyon's consultant and NTIA are initiating consultation with various interested parties, such as the Alaska SHPO, BLM, local organizations and government, and federally recognized tribes.

Doyon's consultant is preparing a legal notice to publish in newspapers serving the Project area.

The NTIA does not have any outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation for this undertaking.

14. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

The Project website link is: <https://www.akfiberproject.com/index.html>.

Doyon's environmental and permitting consultant, Owl Ridge has developed a web mapper that displays the Project location, the preliminary APE, Project FOC installation methods, and communities in the Project vicinity. The web mapper is available at the link provided above.

The Project will notify the public of the potential undertaking by publication in a local newspaper of general circulation.

15. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system? If so, please provide the link or reference number:

Yes, the undertaking is considered a “major” or “covered” undertaking listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system. A link to the project’s Permitting Dashboard for Federal Infrastructure Projects is linked below.

<https://www.permits.performance.gov/permitting-project/fast-41-covered-projects/alaska-fiberoptic-project-segment-1>

Please see the documents available via links described above, or included as attachments to this notice, which include the following:

X Maps, photographs, drawings, and/or plans

Attachments Include:

Distribution List

Executive Summaries of Two Cultural Resources Literature Reviews

Alaska Cultural Resources Consultants, LLC (ACRC)

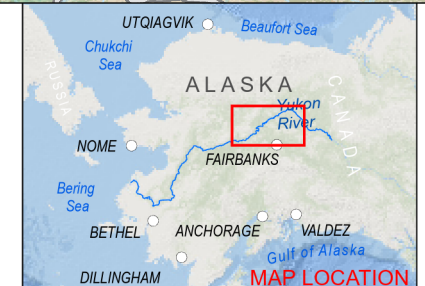
2023 *The Alaska FiberOptic Project Fort Yukon to Tanana Cultural Resources Literature Review.* Report prepared for Owl Ridge Natural Resources Consultants, Inc., Anchorage, Alaska by Alaska Cultural Resources Consultants, LLC.

DOWL

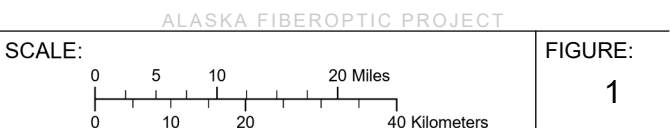
2023 *Cultural Resources Literature Review and Recommendations. New Horizons Telecom, Inc. Fairbanks--Yukon Fiber Route.* Report prepared for New Horizons Telecom, Inc., Palmer, Alaska by DOWL, Anchorage, Alaska.



- | | |
|--------------------------------|-----------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | Scratch Plow |
| ▬ Parks, Preserves and Refuges | Canyon Bypass (Terrestrial) |
| ▬ Highway | Jet Plow |
| | Terrestrial |



ALASKA FIBEROPTIC PROJECT
PROJECT LOCATION MAP



Distribution List

State and Federal Agencies (9)	
Advisory Council on Historic Preservation (ACHP)	Signatory
Alaska Department of Fish and Game (ADFG)	Invited Signatory
Alaska Department of Natural Resources (DNR)	Invited Signatory
Alaska Department of Transportation and Public Facilities (DOT&PF)	Invited Signatory
Alaska State Historic Preservation Officer (SHPO)	Signatory
Bureau of Land Management (BLM)	Signatory
National Telecommunications and Information Administration (NTIA)	Signatory
U.S. Army Corps of Engineers (USACE)	Signatory
U.S. Fish & Wildlife Service (USFWS)	Invited Signatory
Federally Recognized Tribes (6)	
Beaver Village Council	Concurring Party
Gwitchyaa Zhee Gwich'in Tribal Government (GZGTG)	Concurring Party
Native Village of Minto	Concurring Party
Rampart Tribal Council	Concurring Party
Stevens Village Council	Concurring Party
Tanana Tribal Council	Concurring Party
ANCSA Corporations and Non-Profit Tribal Corporations (10)	
Baan-O-Yeel Kon Corporation (BOYK)	Concurring Party
Beaver Kwitich'in Corporation	Concurring Party
Council of Athabascan Tribal Governments (CATG)	Concurring Party
Dinyea Corporation	Concurring Party
Doyon, Limited (Doyon)	Signatory
Fairbanks Native Association (FNA)	Concurring Party
Gwitchyaa Zhee Corporation	Concurring Party
Seth-De-Ya-Ah Corporation	Concurring Party
Tanana Chiefs Conference (TCC)	Concurring Party
Tozitna, Limited	Concurring Party
City and Borough Governments (4)	
City of Fairbanks	Concurring Party
City of Fort Yukon	Concurring Party
City of Tanana	Concurring Party
Fairbanks North Star Borough	Concurring Party
Other (3)	
DeployCom	Invited Signatory
University of Alaska Museum of the North (UAMN)	Concurring Party
Yukon-Tanana Historical Society	Concurring Party

EXECUTIVE SUMMARY

New Horizons Telecom, Inc. has been awarded a design and permitting contract for a new fiber optic cable between Fairbanks and the Yukon River Bridge (Project). This fiber optic cable is a segment of a larger broadband infrastructure deployment project funded by the National Telecommunications and Information Administration, which intends to install direct-connection fiber optic cable to nearly 600 unserved Alaska Native households in numerous remote Alaskan villages.

The Project runs from Fairbanks north to the Yukon River, primarily along the Elliot and Dalton highways. New Horizons Telecom, Inc. intends to install the new fiber optic cable parallel to an existing FOC line installed between 2012 and 2014, which runs north from Fairbanks within the Alaska Department of Transportation and Public Facilities right-of-way. The purpose of this document is to review the proposed installation route for any known cultural resources, assess previous cultural resources survey coverage within the proposed area of installation, make recommendations regarding potential redesign options to align the Project with previously surveyed areas, and, if necessary, to determine if any additional field survey efforts may be required to assist New Horizons Telecom, inc. with cultural resources compliance prior to installation of the new fiber optic cable. The Study Area for this review is a 200-foot corridor (100 feet on either side of the proposed Project alignment).

DOWL conducted a review of Alaska Heritage Resource Survey data maintained by OHA to identify previously documented historic buildings, sites, structures, objects, or districts located within or near the Study Area for the Project, and queried the Alaska Heritage Resource Survey database to determine the extent of previous cultural resource work in the area. DOWL also consulted aerial imagery and topographic maps, reviewed publicly available terrain data, and integrated publicly available Alaska Native placenames data into the analysis.

Results of the analysis indicate that 87% (approximately 113 miles) of the currently proposed Project alignment was considered as part of the 2012 literature review and survey, during which high-potential areas were subjected to pedestrian survey and subsurface testing. The remaining 13% (approximately 17 miles) of the alignment were assessed for the need for additional field survey efforts.

Based on the results of the literature review, DOWL has assembled a list of recommended project redesigns to avoid potential adverse effects to documented resources and to minimize the likelihood that SHPO or other regulatory agencies will request additional field survey in advance of Project construction. If recommendations contained herein are feasible and can be incorporated into the proposed Project, DOWL recommends that no additional field survey is necessary, and that the Project will not cause adverse effects to known historic properties.

EXECUTIVE SUMMARY

Doyon, Limited (Doyon), in coordination with the National Telecommunication and Information Administration (NTIA), proposes to construct and operate Segment 1 of the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a grant from the Tribal Broadband Connectivity Program, and only this NTIA-provided funding, to provide broadband access to a portion of the area within its Alaska Native Regional Corporation boundary that is unserved by broadband internet. Doyon proposes to provide broadband internet service to five currently unserved communities along the Yukon River; the five communities are Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana.

The proposed project is divided into two corridors: (1) a Terrestrial Corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and (2) a River Corridor that initiates at the point the fiber optic cable (FOC) enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The River Corridor includes all proposed activities within the river, within the five communities, and along the overland Canyon Bypass that avoids the Rampart Rapids. The FOC will be installed in two phases during the summers of 2024 and 2025.

The Project is funded by the federal government through the Inflation Reduction Act. The NTIA is the lead federal agency for the Project. As such, the project is subject to a review of cultural resources under Section 106 of the National Historic Preservation Act (NHPA). An Area of Potential Effects (APE) has not been established for the Project.

Owl Ridge Natural Resources Consultants, Inc. (Owl Ridge) contracted with Alaska Cultural Resources Consultants (ACRC) to prepare this literature review report for the River Corridor portion of the Project. The report compiles known and readily available information about cultural resources in the Project Study Area. The Project Study Area for the River Corridor is defined as a corridor 1.5 miles either side of mid-channel of the Yukon River, and the Canyon Bypass route around Rampart Rapids, along the south side of the Yukon River. ACRC reviewed published and available unpublished literature about cultural resources including archaeology excavations and surveys, the prehistory and history of the area, ethnography, Native and non-Native placenames, paleontology resources, and subsistence uses. The review identified numerous cultural resources within the five communities and along the Yukon River. There are historic properties at Fort Yukon and Tanana. The current engineering design does not affect any historic properties.



March 1, 2024

Andrew Bielakowski
Director of Environmental Compliance and Federal Preservation Officer
First Responder Network Authority
12201 Sunrise Valley Drive M/S 243
Reston, Virginia 20192

Ref: *Alaska Fiber Optic Project*
Yukon-Koyukuk Census Area, Alaska
ACHP Project Number: 020555

Dear Mr. Bielakowski:

On February 7, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification of adverse effect for the referenced undertaking that was submitted in accordance with 36 CFR 800.6(a)(1) of Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). The background documentation included with your submission did not include all of the required information specified in 36 CFR § 800.11(e) of the regulations. We, therefore, are unable to determine whether Appendix A, *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.

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

If you have any questions, please contact Emily Choi at (202) 517-0207 or by e-mail at echoi@achp.gov and reference the ACHP Project Number above.

Sincerely,

Artisha Thompson
Historic Preservation Technician
Office of Federal Agency Programs



MEMORANDUM

To: Andrew Bielakowski
Company: National Telecommunications and Information Administration
From: Brooke Therrien
Company: Owl Ridge Natural Resource Consultants, Inc.
Date: June 7, 2024
Subject: Response to ACHP's Information Request
Attachments: Outreach and NHPA Consultation Documentation

Introduction

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

The purpose of the memorandum is to provide additional documentation as requested by the Advisory Council on Historic Preservation (ACHP) in their letter dated March 1, 2024, to assist in determining whether ACHP participation in the consultation to execute a Programmatic Agreement (PA) for the Alaska FiberOptic Project is warranted.

General Project Outreach

General project updates and outreach have been on-going since the start of this project. Initially, as part of Doyon's grant application submitted in 2021, letters of resolution and support were obtained from communities in the project area, the Tribal entities, and the native corporations, as well as other entities such as the Tanana Chiefs Conference, Interior Regional Housing Authority, Senator Click Bishop, Yukon Flats School District, and Yukon-Koyukuk School District. These letters provided general support for the project and stakeholders who would most likely be impacted by the proposed action. Since receiving the grant, Doyon has maintained regular communication with their stakeholders through the publication of mailers. Copies of the letters and examples of general project communication are attached (Attachment A-1).

After the grant was received and project design initiated, Doyon completed two trips to each of the five communities where hardwired broadband service would be provided. The goal of these trips was to update the communities on the project status and answer any questions. The first community visit and meetings occurred in May 2023 and the second meeting occurred in August 2023. Copies of the public notices, PowerPoint presentation slides, sign-in sheets, and meeting notes are attached (Attachment A-2 to Attachment A-5).

National Historic Preservation Act

Consultation under Section 106 of the National Historic Preservation Act is currently underway, and a project specific draft Programmatic Agreement (PA) is being developed. Consultation efforts conducted to date and future planned outreach efforts are described below.

State Historic Preservation Outreach

Informal meetings and discussions with the State Historic Preservation Office (SHPO) have occurred and are on-going. On September 12, 2023, a kickoff meeting with SHPO occurred where, in general, the proposed project activities, timelines, and consultation process were discussed. A copy of the meeting notes is attached (Attachment B-1).

Programmatic Agreement Notification Letter

On February 7, 2024, a notification letter was sent, by Owl Ridge Natural Resource Consultants Inc., on behalf of the NTIA, to state and federal agencies, community and tribal representatives, native corporations, and other potentially interested parties. The purpose of this letter was to notify stakeholders that the NTIA was planning to develop a project specific PA and to encourage their feedback and participation. A distribution list was also attached to this letter. No substantive comments were received from stakeholders, but several confirmations of receipt were received. On February 9, 2024, both Bureau of Land Management (BLM) and U.S. Fish and Wildlife Service (USFWS) requested copies of the desktop cultural resources report which was provided on the same day. A follow up phone conversation and informal meetings with the Alaska Department of Transportation and Public Facilities (DOT&PF) also occurred. SHPO's office also provided additional follow up during this period. Copies of the correspondence between SHPO, BLM, USFWS, and DOT&PF are attached (Attachment B-2, Attachment B-3).

Webinar

On April 17, 2024, a webinar was held where all stakeholders on the distribution list as well as entities within the Doyon region were invited. The purpose of the webinar was to update stakeholders on the proposed project and specifically discuss that a PA was being prepared and would be sent out in the following days. Meeting invitations, meeting reminders, PowerPoint slides, attendee list, and meeting follow up are attached (Attachment B-4).

Programmatic Agreement

On April 18, 2024, a draft PA was distributed via email to all stakeholders listed on the distribution list, totaling 28 entities (Attachment B-5). The email included a link to the draft PA and the Cultural Resource Management Plan (CRMP). The email also included a summary of consultation completed to date, directed reviewers to the web mapper that contained the preliminary Area of Potential Effect (APE), and summarized the PA process. Finally, the email requested that stakeholders advise the NTIA if they would like to participate or decline to participate in the development of the PA and CRMP. Individual follow-up phone calls were made to stakeholders on May 6 through May 9, 2024. Brief notes and details regarding those phone calls are attached (Attachment B-6). At the end of the 30-day comment period the following entities had advised NTIA of their participation status (Table 1 and Attachment B-7).

Comments on the draft PA were received from BLM and SHPO on May 18 and 21, 2024, respectively. Other participating stakeholders did not provide any substantive comments. On May 20, 2024, a follow

up email was sent to all entities that had not provided a response and requested that they provide a response by May 24, 2024 (Attachment B-8). The email also clarified that if a response was not received it would be assumed that that agency was declining to participate. No further emails were received from other stakeholders.

Table 1. PA/CRMP Participation Status (as of May 18, 2024)

Participating (required and elected)	Declined to Participate	No Response	
NTIA* SHPO* BLM* U.S Army Corps of Engineers* Doyon, Limited* DeployCom Beaver Village Council	USFWS DOT&PF Dinyea Corporation Gwitchyaa Zhee Corporation Seth-Da-Ya-Ah Corporation	Alaska Department of Fish & Game Alaska Department of Natural Resources Baan-O-Yeel Kon Corporation Beaver Kwit'chin Corporation Tozitna, Limited Gwichyaa Zhee Gwich'in Tribal Government Native Village of Minto Rampart Tribal Council Stevens Village Council Tanana Tribal Council	City of Fairbanks City of Fort Yukon City of Tanana Fairbanks North Star Borough Tanana Chiefs Conference Council of Athabascan Tribal Governments Fairbanks Native Association University of Alaska Museum of the North Yukon-Tanana Historical Society

(*) Entities required to participate.

The PA and CRMP have been revised based on the comments provided by SHPO and the BLM. The comments received from SHPO and BLM were primarily editorial in nature and mainly requested further clarifying statements. A comment and response matrix is attached (Attachment B-9) and a copy of the revised PA, which includes the CRMP is attached (Attachment B-10). A copy of the comment and response matrix will be provided to SHPO and BLM. Additional coordination will occur, as needed, to ensure the comments have been adequately addressed.

Once all comments are adjudicated the final PA will be sent to the following entities for signature and execution:

- SHPO
- BLM
- USACE
- Doyon, Limited
- DeployCom
- Beaver Village Council

Attachments

Contents

Note to reader: Documentation listed here can also be found in Appendix L and N.

A. General Project Outreach

Attachment A-1. Letters of Resolution

Attachment A-2. Mailer

Attachment A-3. Fact Sheet

Attachment A-4. Community Meeting (May 2023)

- Travel Itinerary
- PowerPoint Slides
- Meeting Notes & Sign-in Sheets (Tanana)
- Meeting Notes & Sign-in Sheets (Rampart)

Attachment A-5. Community Meeting (August 2023)

- Travel Itinerary
- PowerPoint Slides
- Radio Announcement
- Public Meeting Flyers (Fort Yukon, Stevens Village, and Beaver)

B. National Historic Preservation Act Consultation

Attachment B-1. SHPO Informal Meeting Notes (September 12, 2023)

Attachment B-2. PA Initiation Letter (February 7, 2024)

Attachment B-3. PA Invitation Responses (9 total)

Attachment B-4. Webinar (April 17, 2024)

- Invitation
- Reminder
- PowerPoint Presentation Slides
- Attendees List

Attachment B-5. Email submittal of the Draft PA/CRMP (April 18, 2024)

Attachment B-6. Summary of Outreach/Follow Up (May 6 through May 9, 2024)

Attachment B-7. Responses to Draft PA/CRMP (11 total)

Attachment B-8. Reminder Email (May 20, 2024)

Attachment B-9. Draft PA/CRMP Comment and Response Matrix

Attachment B-10. Draft PA (with SHPO/BLM Comments incorporated)



July 3, 2024

Andrew Bielakowski
Director of Environmental Compliance and Federal Preservation Officer
First Responder Network Authority
12201 Sunrise Valley Drive M/S 243
Reston, Virginia 20192

Ref: *Alaska Fiber Optic Project*
Alaska
ACHP Project Number: 020555

Dear Mr. Bielakowski:

On June 20, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Alaska SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Emily Choi at (202) 517-0207 or by e-mail at echoi@achp.gov and

reference the ACHP Project Number above.

Sincerely,

A handwritten signature in black ink that reads "Dana Daniels". The signature is written in a cursive, flowing style.

Dana Daniels
Historic Preservation Technician
Office of Federal Agency Programs

From: [Brooke Therrien](#)
To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; [Head, Melissa M](#); jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.brace@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; boyk@mosqitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org; melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribe.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](mailto:Andrew.Bielakowski@firstnet.gov); [Amanda Pereira \(apereira@ntia.gov\)](mailto:Amanda.Pereira@apereira@ntia.gov); TODDA@doyon.com; [Molly Redilla \(redillam@doyon.com\)](mailto:Molly.Redilla@redillam@doyon.com); [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#); [Jamie Marunde](#)
Subject: Alaska FiberOptic Project: NHPA Section 106 Consultation
Date: Wednesday, February 7, 2024 4:34:00 PM
Attachments: [Stakeholder ltr Alaska FOP signed.pdf](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is inviting you to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project). The project is proposing to provide broadband internet service to five currently underserved communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). We are submitting this letter to introduce the Project, and to formally invite your organization to participate. You will be notified when a draft of the PA is available for review.

Attached you will find a formal letter which includes a Project Location Map and a Distribution List. Within the letter there is a link to an online web mapper which displays the preliminary Area of Potential Effect. If you have questions or comments, please do not hesitate contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. Alternatively, you can reply to this email or contact me directly via phone at (907) 759-3013.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlriddenrc.com | www.owlriddenrc.com

[Confidentiality Notice](#)



February 7, 2024

Subject: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project) funded by a grant from the National Telecommunications and Information Administration's Tribal Broadband Connectivity Program.

To Whom It May Concern:

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (Figure 1).

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.

Project Description

The Project is divided into two corridors: a terrestrial corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a river corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The river corridor includes all proposed activities within the river as well as an overland Canyon Bypass that avoids the Rampart Rapids.

The Project will be completed in two phases over 2024 and 2025. The majority of the FOC will be installed during 2024 and includes a portion of the terrestrial corridor, the river corridor between Beaver and Tanana, and the Canyon Bypass corridor. The FOC between Fort Yukon and Beaver, and remainder of the terrestrial corridor will be completed during the summer of 2025.

The terrestrial portion of the Project starts in Fairbanks and continues north to the crossing over the Yukon River, terminating on the north side of the E.L. Patton Bridge (132 miles). Installation of the FOC uses a variety of methods all located primarily within the existing highway right-of-way (ROW) managed by the Alaska Department of Transportation and Public Facilities (DOT&PF). The FOC will be strung on an existing pole line for the first 20 miles and will then transition below ground where clearing, vibratory plowing, and trenching will be used to directly bury the cable below the surface. Horizontal directional drilling (HDD) will be used, as necessary, at creek and roadway crossings.

The riverine portion of the Project starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (316 miles). All in-water work will be completed from a self-propelled, self-contained cable-lay barge supported by smaller support skiffs. A scratch plow will be used between Beaver and Tanana and a jet plow will be used between Fort Yukon and Beaver to bury the FOC within the riverbed.

Within each community, a beach manhole (BMH) and a communications shelter will be placed within the existing utility easement or other designated location. Once the FOC leaves the BMH, it will be strung on existing poles aboveground with minimal ground disturbance anticipated.

A Canyon Bypass is proposed between the communities of Rampart and Tanana to bypass the Rampart Rapids (20 miles). Conventional vibratory plowing will primarily be used to install the FOC in the Canyon Bypass corridor, and HDD will be used to cross under any streams along the alignment. A BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River.

Preliminary Area of Potential Effect (APE)

The Area of Potential Effect (APE) for the terrestrial portions of the Project is centered on the FOC installation alignment centerline with a 30-foot buffer either side of the alignment, 60 feet wide in total. The APE for riverine installation of FOC in the Yukon River is centered on the FOC burial in the bed of the river, with a 100-foot buffer either side of the centerline, 200 feet wide in total. The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](https://arcgis.com).

Identification Efforts

Two desktop cultural resource literature reviews were conducted, one for the terrestrial portion and the other for the river portion:

- *The Alaska FiberOptic Project Fort Yukon to Tanana Cultural Resources Literature Review* (ACRC 2023)
- *Cultural Resources Literature Review and Recommendations* (Fairbanks – Yukon Fiber Route) (DOWL 2023)

These reports were submitted to the Alaska State Historic Preservation Office (SHPO) for review on January 15, 2024, and are available upon request.

Consultation Efforts

Consistent with 36 CFR § 800.2(c)(4), NTIA has authorized Owl Ridge Natural Resource Consultants, Inc. (Owl Ridge) to participate in Section 106 of NHPA consultation with stakeholders for the Project. As part of

February 7, 2024

Page 3

the consultation for the Project, NTIA, with support from Doyon and Owl Ridge, has begun developing a comprehensive list of potential stakeholders and preliminarily identifying their role in the development of the PA. During the development of the PA, consulting parties are designated as one of the following, in accordance with 36 CFR § 800.6(c):

- Signatory
- Invited Signatory
- Concurring Party

Attached to this letter is a preliminary list of entities and their designated role in the PA. This list will be updated pending any comments received.

Conclusion

Pursuant to ACHP's regulations implementing Section 106 of the NHPA, NTIA is providing you an opportunity to comment and invite participation in our Section 106 process via Programmatic Agreement (36 CFR § 800.14(b)(3)). We also request that you identify any additional parties not included in the distribution list below that should be contacted to determine if they are interested in the Alaska FiberOptic Project and would like to receive information about it.

Under Section 106, this Project is being evaluated for its potential to affect historic properties. In addition to consulting with SHPO, NTIA recognizes its responsibilities pursuant to Section 106 regarding consultation with Native Alaskan Tribes and organizations concerning properties of religious and/or cultural significance that could be affected by the undertaking. All information provided will be kept confidential and used only to avoid, minimize, or mitigate any adverse effects to historic properties. The PA in development will confirm the responsibilities of NTIA and other stakeholders and outline the procedures to address concerns about historic properties and properties of religious and/or cultural significance.

Communications may be emailed to Andrew.Bielakowski@firstnet.gov. If mail is your preferred method of communication, kindly send a copy to Owl Ridge Natural Resource Consultants, Inc., 4060 B Street, Suite 200, Anchorage, Alaska 99503, Attention: Brooke Therrien (btherrien@owlridgenrc.com). Owl Ridge is working under contract to Doyon to prepare the required environmental documents and permits for the Project. Please do not hesitate to contact me if you have any questions or concerns about the Project.

Best regards,

ANDREW
BIELAKOWSKI

Digitally signed by
ANDREW BIELAKOWSKI
Date: 2024.02.06
18:08:43 -06'00'

Andrew Bielakowski

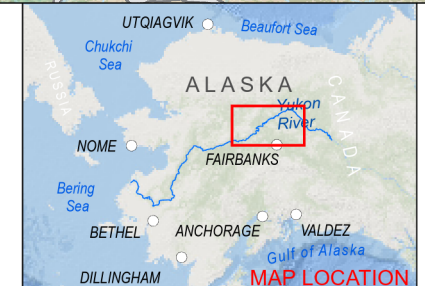
Andrew.Bielakowski@firstnet.gov
Environmental Program Officer
Office of Internet Connectivity and Growth
National Telecommunications and Information Administration
202-657-7982 mobile

Attachments:

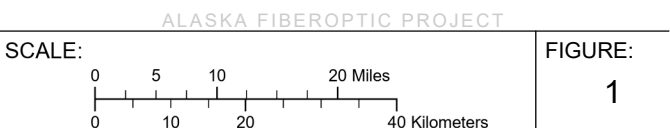
Figure 1. Alaska FiberOptic Project Location
Distribution List



- | | |
|--------------------------------|-----------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | Scratch Plow |
| ▬ Parks, Preserves and Refuges | Canyon Bypass (Terrestrial) |
| ▬ Highway | Jet Plow |
| | Terrestrial |



ALASKA FIBEROPTIC PROJECT
PROJECT LOCATION MAP



Distribution List

State and Federal Agencies (9)	
Advisory Council on Historic Preservation (ACHP)	Signatory
Alaska Department of Fish and Game (ADFG)	Invited Signatory
Alaska Department of Natural Resources (DNR)	Invited Signatory
Alaska Department of Transportation and Public Facilities (DOT&PF)	Invited Signatory
Alaska State Historic Preservation Officer (SHPO)	Signatory
Bureau of Land Management (BLM)	Signatory
National Telecommunications and Information Administration (NTIA)	Signatory
U.S. Army Corps of Engineers (USACE)	Signatory
U.S. Fish & Wildlife Service (USFWS)	Invited Signatory
Federally Recognized Tribes (6)	
Beaver Village Council	Concurring Party
Gwitchyaa Zhee Gwich'in Tribal Government (GZGTG)	Concurring Party
Native Village of Minto	Concurring Party
Rampart Tribal Council	Concurring Party
Stevens Village Council	Concurring Party
Tanana Tribal Council	Concurring Party
ANCSA Corporations and Non-Profit Tribal Corporations (10)	
Baan-O-Yeel Kon Corporation (BOYK)	Concurring Party
Beaver Kwitich'in Corporation	Concurring Party
Council of Athabascan Tribal Governments (CATG)	Concurring Party
Dinyea Corporation	Concurring Party
Doyon, Limited (Doyon)	Signatory
Fairbanks Native Association (FNA)	Concurring Party
Gwitchyaa Zhee Corporation	Concurring Party
Seth-De-Ya-Ah Corporation	Concurring Party
Tanana Chiefs Conference (TCC)	Concurring Party
Tozitna, Limited	Concurring Party
City and Borough Governments (4)	
City of Fairbanks	Concurring Party
City of Fort Yukon	Concurring Party
City of Tanana	Concurring Party
Fairbanks North Star Borough	Concurring Party
Other (3)	
DeployCom	Invited Signatory
University of Alaska Museum of the North (UAMN)	Concurring Party
Yukon-Tanana Historical Society	Concurring Party

From: [Andrew Bielakowski](#)
To: [Herring, McKenzie S \(DNR\)](#); [Brooke Therrien](#)
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation
Date: Thursday, February 22, 2024 5:10:58 AM

[External]

Thanks for the feedback, McKenzie. Regarding the first couple items, yes, please, if you could review the two reports and their recommendations that would be very helpful in general, but also because your responses would help steer expectations and PA/CRMP sections. Regarding the PA invitation, obviously SHPO is a big part of that, so confirmation of that would be helpful although we would assume so given our previous conversations. We were planning on following up with parties, actually this week, as it has been a couple weeks, and we will be getting a feel for interest and what will be necessary from there. We have a team with deep roots to some of the communities, so we are hoping for some very meaningful interactions. Please let us know if you have any questions regarding the reports or anything else as you dive in.

Thank You,
Andy



Andrew Bielakowski
Director of Environmental Compliance and Federal Preservation Officer

First Responder Network Authority

FirstNet.gov | [@firstnetgov](https://twitter.com/firstnetgov)

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

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From: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Sent: Wednesday, February 21, 2024 6:02 PM
To: Brooke Therrien <btherrien@owlridgenrc.com>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

Hi Brooke (and Andy) I should have checked in earlier. When I received a subsequent email on February 7th that had an invitation to participate in it—I made the obviously now false assumption that I was to review that. I am happy to take a look at what was submitted prior to see if there is more to address at this moment. One comment I can provide now if you are initiating a PA is to begin scheduling meetings to first introduce the objectives and reasoning for the PA and get a gauge for the level of involvement consulting parties will have, then setting up subsequent meetings to actually address drafts of the PA as it develops (helps keep things on track). Thank you!

McKenzie S. Herring
Archaeologist I - Review and Compliance
Alaska State Historic Preservation Office (AKSHPO)/Office of History and Archaeology (OHA)
550 W. 7th Ave, Suite 1310
Anchorage, AK 99507
(907) 269-8726
mckenzie.herring@alaska.gov

From: Brooke Therrien <btherrien@owlriddenrc.com>
Sent: Wednesday, February 21, 2024 2:45 PM
To: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: FW: Alaska FiberOptic Project: NHPA Section 106 Consultation

You don't often get email from btherrien@owlriddenrc.com. [Learn why this is important](#)

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[Internal]

Hi McKenzie,

I just wanted to follow up on a couple of cultural resource items related to the Alaska FiberOptic Project.

1. Please confirm you received the email below and the attached document. We are in the process of finalizing a Programmatic Agreement and Cultural Resources Management Plan. If there are any preliminary requirements or comments we can incorporate please advise.
2. On January 19, 2024, your office confirmed receipt of two desktop cultural resource literature reviews which were submitted on behalf of the National Telecommunication & Information Administration. Please let me know if you have any comments on these documents.

If you have any questions or concerns, please don't hesitate to reach out to Andy, who is cc'd on this email, or myself.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

Main 907.344.3448 | Direct 907.759.3013

From: Brooke Therrien

Sent: Wednesday, February 7, 2024 4:35 PM

To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; Head, Melissa M <mhead@blm.gov>; jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.braser@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; boyk@mosquitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org; melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribe.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net

Cc: Andrew Bielakowski (Andrew.Bielakowski@firstnet.gov) <Andrew.Bielakowski@firstnet.gov>; Amanda Pereira (apereira@ntia.gov) <apereira@ntia.gov>; TODDA@doyon.com; Molly Redilla (redillam@doyon.com) <redillam@doyon.com>; Angela Ludwick <ludwicka@doyon.com>; Doug Hudson <Dhudson@deploycom.com>; Glenn Ruckhaus <gruckhaus@owlridgenrc.com>; Paul Cartier <pcartier@owlridgenrc.com>; Jamie Marunde <jmarunde@owlridgenrc.com>

Subject: Alaska FiberOptic Project: NHPA Section 106 Consultation

Hello,

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In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). We are submitting this letter to introduce the Project, and to formally invite your organization to participate. You will be notified when a draft of the PA is available for review.

Attached you will find a formal letter which includes a Project Location Map and a Distribution List.

Within the letter there is a link to an online web mapper which displays the preliminary Area of Potential Effect. If you have questions or comments, please do not hesitate contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. Alternatively, you can reply to this email or contact me directly via phone at (907) 759-3013.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlrigenrc.com | www.owlrigenrc.com

[Confidentiality Notice](#)

Brooke Therrien

From: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Sent: Thursday, March 21, 2024 10:02 AM
To: Andrew Bielakowski; Brooke Therrien
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

Hi Andy, I am not seeing major red flags with the recommendations. My only initial concern is that those recommendations have a lot of “if this, then that”, where we would prefer a higher level of clarity on what WILL be the path the project takes (as far as avoidance/use of other methods) moving forward within the body of the PA. I recognize this may not be 100% feasible, but the more definitive we can be when it comes to project details the better!

Mckenzie S. Herring
Archaeologist I - Review and Compliance
Alaska State Historic Preservation Office (AKSHPO)/Office of History and Archaeology (OHA)
550 W. 7th Ave, Suite 1310
Anchorage, AK 99507
(907) 269-8726
mckenzie.herring@alaska.gov

From: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Sent: Thursday, March 21, 2024 3:15 AM
To: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>; Brooke Therrien <btherrien@owlridernc.com>
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

Thanks, McKenzie. I think that all makes sense and is basically how we have been drafting the PA up to this point, getting ready for distribution. I think the biggest thing, and we know it is still a draft at this point and know that other stakeholders may shift things this way or that way, is that we wanted to make sure that the general approach/recommendations for fieldwork that were presented in the literature searches were generally agreeable to SHPO. As you can imagine, if not, that would kind of be a problem starting out of the gate for the draft PA, so we wanted to make sure that relatively speaking we had your relative by-in before distributing to the larger group. Again, we know that things can change, but we wanted to get a general idea.

Thank You,
Andy



Andrew Bielakowski
Director of Environmental Compliance and Federal Preservation Officer

First Responder Network Authority
FirstNet.gov | [@firstnetgov](https://twitter.com/firstnetgov)

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

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From: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Sent: Wednesday, March 20, 2024 6:14 PM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

Apologies Brooke, time has gotten away from me. I will be a lot more engaged when it comes to actual review of the draft documents! It looks like the literature review(s) was quite thorough, which I appreciate and will help inform the language of the PA greatly. Generally when I am looking at the first draft of a PA I am looking for sections that address the knowns, and then the unknowns. So, a first section being “we know xyz will be affected, this is how we will minimize or mitigate those known effects” with the next section being “these are the areas where we need more information, we will be doing xyz in this timeframe, using this method to address those information gaps—and here is the process for how we resolve it”, with another section (or a reference to an appendix) “these are the areas/activities that we do not believe further identification or CR work is needed and may proceed following the inadvertent discovery stip XYZ”. Obviously since it is a first draft, all of the “shalls” are proposals---but setting it up with that framework gives everyone a clear idea of the goals of the PA to focus in on. Some of this will also be dictated by the applicants needs as well (timeline/phasing of construction). Thank you!

Mckenzie S. Herring
Archaeologist I - Review and Compliance
Alaska State Historic Preservation Office (AKSHPO)/Office of History and Archaeology (OHA)
550 W. 7th Ave, Suite 1310
Anchorage, AK 99507
(907) 269-8726
mckenzie.herring@alaska.gov

From: Brooke Therrien <btherrien@owlriddenrc.com>
Sent: Wednesday, March 20, 2024 2:52 PM
To: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

Hi McKenzie,

I am just following up. Based on the emails below I am wondering if you or your office is going to provide any formal feedback on either of the two-desktop cultural resource literature reviews (submitted January 15, 2024) or the initiation letter (sent February 7, 2024)?

NTIA is reviewing/finalizing the draft Programmatic Agreement (PA) and a draft Cultural Resources Management Plan (CRMP), and we are preparing to send a draft of the PA and CRMP to stakeholder for review in early April. We also have tentatively scheduled a webinar to discuss the overall project and PA with local community representatives but are still planning the details.

Sincerely,

From: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Sent: Wednesday, February 21, 2024 3:02 PM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: RE: Alaska FiberOptic Project: NHPA Section 106 Consultation

[External]

Hi Brooke (and Andy) I should have checked in earlier. When I received a subsequent email on February 7th that had an invitation to participate in it—I made the obviously now false assumption that I was to review that. I am happy to take a look at what was submitted prior to see if there is more to address at this moment. One comment I can provide now if you are initiating a PA is to begin scheduling meetings to first introduce the objectives and reasoning for the PA and get a gauge for the level of involvement consulting parties will have, then setting up subsequent meetings to actually address drafts of the PA as it develops (helps keep things on track). Thank you!

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550 W. 7th Ave, Suite 1310
Anchorage, AK 99507
(907) 269-8726
mckenzie.herring@alaska.gov

From: Brooke Therrien <btherrien@owlriddenrc.com>
Sent: Wednesday, February 21, 2024 2:45 PM
To: Herring, McKenzie S (DNR) <mckenzie.herring@alaska.gov>
Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: FW: Alaska FiberOptic Project: NHPA Section 106 Consultation

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[Internal]

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2. On January 19, 2024, your office confirmed receipt of two desktop cultural resource literature reviews which were submitted on behalf of the National Telecommunication & Information Administration. Please let me know if you have any comments on these documents.

If you have any questions or concerns, please don't hesitate to reach out to Andy, who is cc'd on this email, or myself.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Brooke Therrien

Sent: Wednesday, February 7, 2024 4:35 PM

To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; Head, Melissa M <mhead@blm.gov>; jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.braser@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; boyk@mosquitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org; melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribes.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net

Cc: Andrew Bielakowski (Andrew.Bielakowski@firstnet.gov) <Andrew.Bielakowski@firstnet.gov>; Amanda Pereira (apereira@ntia.gov) <apereira@ntia.gov>; TODDA@doyon.com; Molly Redilla (redillam@doyon.com) <redillam@doyon.com>; Angela Ludwick <ludwicka@doyon.com>; Doug Hudson <Dhudson@deploycom.com>; Glenn Ruckhaus <gruckhaus@owlridgenrc.com>; Paul Cartier <pcartier@owlridgenrc.com>; Jamie Marunde <jmarunde@owlridgenrc.com>

Subject: Alaska FiberOptic Project: NHPA Section 106 Consultation

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Attached you will find a formal letter which includes a Project Location Map and a Distribution List. Within the letter there is a link to an online web mapper which displays the preliminary Area of Potential Effect. If you have questions or comments, please do not hesitate contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. Alternatively, you can reply to this email or contact me directly via phone at (907) 759-3013.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
4060 B Street, Suite 200 | Anchorage, Alaska 99503
Main 907.344.3448 | Direct 907.759.3013
btherrien@owlridgenrc.com | www.owlridgenrc.com

From: [Brooke Therrien](#)
To: [Glassburn, Crystal L](#)
Subject: RE: [EXTERNAL] Alaska FiberOptic Project: NHPA Section 106 Consultation
Date: Friday, February 9, 2024 2:24:00 PM
Attachments: [image001.png](#)

Hi Crystal,

Below is a link to the OneDrive which contains the two desktop literature reviews.

 [CR Desktop Surveys](#)

You will also receive a direct link from OneDrive which will authorize your access. You can access the folder titled "CR Desktop Surveys" either through the access email that came directly from OneDrive or via the link provided in this email. You may have to first access the folder from the OneDrive email before the link below will work. Be advised the invite may go to your Spam folder so please check there if you have not seen it.

Please reach out if you have any issues with access.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Glassburn, Crystal L <cglassburn@blm.gov>
Sent: Friday, February 9, 2024 1:09 PM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Subject: Re: [EXTERNAL] Alaska FiberOptic Project: NHPA Section 106 Consultation

Hi Brooke,

The invitation to participate in the Section 106 process was received by our office. Would it be possible to share the two desktop literature reviews cited in the letter (ACRC 2023 and DOWL 2023)?

--

Crystal L. Glassburn
Archaeologist
Bureau of Land Management
Central Yukon Field Office
222 University Avenue
Fairbanks, Alaska 99709
(907) 474-2240
cglassburn@blm.gov

From: Brooke Therrien <btherrien@owlridgenrc.com>

Sent: Wednesday, February 7, 2024 4:34 PM

To: Beyersdorf, Geoff <gbeyersd@blm.gov>; Boario, Sara D <sara_boario@fws.gov>; Glassburn, Crystal L <cglassburn@blm.gov>; Head, Melissa M <mhead@blm.gov>; Fox, Jimmy <jimmy_fox@fws.gov>; Ryan.H.Winn@usace.army.mil <Ryan.H.Winn@usace.army.mil>; Carolyn.H.Farmer@usace.army.mil <Carolyn.H.Farmer@usace.army.mil>; Bittner, Judith E (DNR) <judy.bittner@alaska.gov>; mckenzie.herring@alaska.gov <mckenzie.herring@alaska.gov>; douglas.vincent-lang@alaska.gov <douglas.vincent-lang@alaska.gov>; audra.braser@alaska.gov <audra.braser@alaska.gov>; john.boyle@alaska.gov <john.boyle@alaska.gov>; robert.sackinger@alaska.gov <robert.sackinger@alaska.gov>; dot.commissioner@alaska.gov <dot.commissioner@alaska.gov>; boyk@mosquionet.com <boyk@mosquionet.com>; doreendeatonbkc@gmail.com <doreendeatonbkc@gmail.com>; randygmayo@gmail.com <randygmayo@gmail.com>; josh@gzcorporation.org <josh@gzcorporation.org>; cameron@sethcorporation.com <cameron@sethcorporation.com>; president@tozitna.com <president@tozitna.com>; manager@tozitna.com <manager@tozitna.com>; rpitka@beavercouncil.org <rpitka@beavercouncil.org>; melanie.herbert@fortyukon.org <melanie.herbert@fortyukon.org>; labaker@hotmail.com <labaker@hotmail.com>; tribaladministrator@villageofminto.org <tribaladministrator@villageofminto.org>; margaret.moses99767@gmail.com <margaret.moses99767@gmail.com>; margaret.matthew@tananachiefs.org <margaret.matthew@tananachiefs.org>; svs.ira.council@gmail.com <svs.ira.council@gmail.com>; executivedirector@tananatribe.org <executivedirector@tananatribe.org>; mayor@fairbanks.us <mayor@fairbanks.us>; citymanager@fortyukon.us <citymanager@fortyukon.us>; charliecampbell6060@gmail.com <charliecampbell6060@gmail.com>; melissa.kellner@fnsb.gov <melissa.kellner@fnsb.gov>; realty_dept@tananachiefs.org <realty_dept@tananachiefs.org>; Dorothea Adams <dorothea.adams@catg.org>; sginnis@fairbanksnative.org <sginnis@fairbanksnative.org>; jreuther@alaska.edu <jreuther@alaska.edu>; tyhs@alaska.net <tyhs@alaska.net>

Cc: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>; Pereira, Amanda <apereira@ntia.gov>; todda.doyon_contact <todda@doyon.com>; Molly Redilla <redillam@doyon.com>; Angela Ludwick <ludwicka@doyon.com>; Doug Hudson <Dhudson@deploycom.com>; Glenn Ruckhaus <gruckhaus@owlridgenrc.com>; Paul Cartier <pcartier@owlridgenrc.com>; Jamie Marunde <jmarunde@owlridgenrc.com>

Subject: [EXTERNAL] Alaska FiberOptic Project: NHPA Section 106 Consultation

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[Internal]

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[Confidentiality Notice](#)

From: [Andrew Bielakowski](#)
To: [Karchut, Jeremy M](#); [Brooke Therrien](#)
Cc: [Pereira, Amanda](#)
Subject: RE: [EXTERNAL] Re: Literature review request for AK Fiber Optic Project
Date: Monday, February 12, 2024 7:36:59 AM
Attachments: [image002.png](#)
[image003.png](#)

Perfect, let me know if you have any questions.

Thanks,
Andy



Andrew Bielakowski
Director of Environmental Compliance and Federal Preservation Officer

First Responder Network Authority
FirstNet.gov | [@firstnetgov](https://twitter.com/firstnetgov)

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

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From: Karchut, Jeremy M <jeremy_karchut@fws.gov>
Sent: Monday, February 12, 2024 10:36 AM
To: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>; Brooke Therrien <btherrien@owlriddenrc.com>
Cc: Amanda Pereira <apereira@ntia.gov>
Subject: RE: [EXTERNAL] Re: Literature review request for AK Fiber Optic Project

Hi Andy,
I received the link and was bale to download the documents. Thanks again,
Jeremy

Jeremy M. Karchut
Regional Archaeologist/ Regional Historic Preservation Officer

US Fish & Wildlife Service, Alaska Region
1011 E. Tudor Rd.
Anchorage, AK 99503
jeremy_karchut@fws.gov or Microsoft Teams



From: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Sent: Friday, February 9, 2024 2:31 PM
To: Brooke Therrien <btherrien@owlriddenrc.com>; Karchut, Jeremy M <jeremy_karchut@fws.gov>
Cc: Amanda Pereira <apereira@ntia.gov>
Subject: [EXTERNAL] Re: Literature review request for AK Fiber Optic Project

This email has been received from outside of DOI – Use caution before clicking on links, opening attachments, or responding.

Jeremy,

Absolutely, understood. Your knowledge of the resources in the area are invaluable. Please take a look and let us know if you have any concerns. More than happy to discuss as that is why we included you as part of the PA.

Have a great weekend!
Andy

Get [Outlook for iOS](#)

From: Brooke Therrien <btherrien@owlriddenrc.com>
Sent: Friday, February 9, 2024 5:24 PM
To: Karchut, Jeremy M <jeremy_karchut@fws.gov>
Cc: Amanda Pereira <apereira@ntia.gov>; Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: RE: Literature review request for AK Fiber Optic Project

[Internal]

Hi Jeremy,

Below is a link to the OneDrive which contains the two desktop literature reviews.

[CR Desktop Surveys](#)

You will also receive a direct link from OneDrive which will authorize your access. You can access the

folder titled "CR Desktop Surveys" either through the access email that came directly from OneDrive or via the link provided in this email. You may have to first access the folder from the OneDrive email before the link below will work. Be advised the invite may go to your Spam folder so please check there if you have not seen it.

Please reach out if you have any issues with access.

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

Main 907.344.3448 | Direct 907.759.3013

From: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>

Sent: Friday, February 9, 2024 2:11 PM

To: Karchut, Jeremy M <jeremy_karchut@fws.gov>

Cc: Pereira, Amanda <apereira@ntia.gov>; Brooke Therrien <btherrien@owlriddenrc.com>

Subject: RE: Literature review request for AK Fiber Optic Project

[External]

Jeremy,

Thank you for reaching out. The proposed project does not go through the Yukon Flats Refuge; it is adjacent to the Yukon Flats Refuge given the nature of navigable waters in the State of Alaska. We are happy to provide the cultural resources reports to you. Brooke Therrien of Owl Ridge, who is contracted through the grantee, will be providing access to you for those reports in a separate email. Please let me know if you have any questions as I am happy to discuss further.

Thank You,
Andy

Andrew Bielakowski

Environmental Program Officer/Cultural Resources

Andrew.Bielakowski@firstnet.gov

Mobile: 202-657-7982

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From: Karchut, Jeremy M <jeremy_karchut@fws.gov>
Sent: Friday, February 9, 2024 4:35 PM
To: Andrew Bielakowski <Andrew.Bielakowski@firstnet.gov>
Subject: Literature review request for AK Fiber Optic Project

Hi Andrew,

I am the Regional Historic Preservation Officer for the US Fish & Wildlife Service in AK. I received a copy of your letter notifying agencies about the proposed fiber optic project for the Yukon River and the NHPA Section 106 consultations. Could I please get a copy of the literature review for the river corridor, or at least the sections through the Yukon Flats Refuge? I'd like to be prepared to advise the Yukon Flats Refuge manager on any cultural resource concerns within or near the preliminary APE.

Thank you,
Jeremy

Jeremy M. Karchut
Regional Archaeologist/ Regional Historic Preservation Officer
US Fish & Wildlife Service, Alaska Region
1011 E. Tudor Rd.
Anchorage, AK 99503
jeremy_karchut@fws.gov or Microsoft Teams



From: [Brooke Therrien](#)
To: [Martin, Kerri L \(DOT\)](#)
Subject: RE: Alaska FiberOptic Project: Cultural Resource POC
Date: Friday, February 9, 2024 9:26:00 AM
Attachments: [Stakeholder ltr Alaska FOP signed.pdf](#)
[image001.png](#)

Thanks Kerri.

I will send out a Teams meeting for 10 am on Monday (2/12) shortly.

Attached is the main document I'd like to discuss with you. I did forward a copy of this letter to the following email at dot.commissioner@alaska.gov yesterday as well (FYI). I am unsure how familiar you are with this project so my intent for this meeting is to provide any project background info and/or answer any questions that you might have if you happen to review this letter prior to our meeting.

Looking forward to meeting with you.

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Martin, Kerri L (DOT) <kerri.martin@alaska.gov>
Sent: Friday, February 9, 2024 8:54 AM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Subject: RE: Alaska FiberOptic Project: Cultural Resource POC

Hello Brooke,

Thank you for reaching out on the Fiber Optic Project. I can meet with you via teams on Monday 2/12 before 4pm if that works for you.

Sincerely,
Kerri



Kerri L. Martin
Regional Environmental Manager
Department of Transportation & Public Facilities
2301 Peger Road Fairbanks, AK 99709 | ☎: 907.451.5289 | 📠: 907.451.5126 | ✉:
kerri.martin@alaska.gov

From: Brooke Therrien <btherrien@owlriddenrc.com>
Sent: Thursday, February 8, 2024 3:44 PM
To: Martin, Kerri L (DOT) <kerri.martin@alaska.gov>
Subject: FW: Alaska FiberOptic Project: Cultural Resource POC

You don't often get email from btherrien@owlriddenrc.com. [Learn why this is important](#)

Hi Kerri,

Is there a good time to give you a call tomorrow? I'd be happy to set up a meeting in teams. My schedule is wide open except for between 10am - 11am.

I'd like to discuss the Alaska FiberOptic Project and where we are at with the Section 106 Consultation. I am not sure if you've heard of this project so below is very brief synopsis along with an attached figure.

“Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon’s Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (Figure 1).”

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Carter, Garrett D (DOT) <garrett.carter@alaska.gov>
Sent: Thursday, February 8, 2024 2:15 PM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Cc: Martin, Kerri L (DOT) <kerri.martin@alaska.gov>
Subject: RE: Alaska FiberOptic Project: Cultural Resource POC

[External]

Hello Brooke,

I have Cc'ed our Northern Region Environmental Manager (Kerri Martin 907-451-5289). She will be better suited to talk with you about Section 106.

Thank you,
Garrett Carter, P.E.
Northern Region Utility Engineer
Alaska Department of Transportation and Public Facilities
907-451-5408
garrett.carter@alaska.gov

From: Brooke Therrien <btherrien@owlridgenrc.com>
Sent: Thursday, February 8, 2024 11:01 AM
To: Carter, Garrett D (DOT) <garrett.carter@alaska.gov>
Subject: Alaska FiberOptic Project: Cultural Resource POC

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[Internal]

Hi Garrett,

Thanks for the quick chat. As mentioned, I am initiating preliminary consultation under Section 106 of the NHPA for the Alaska FiberOptic Project. More specifically, I am looking for a DOT point of contact who I can further discuss the project with to refine the outreach and contacts.

If you could put me in contact with the correct person, I would appreciate it.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
4060 B Street, Suite 200 | Anchorage, Alaska 99503
Main 907.344.3448 | Direct 907.759.3013
btherrien@owlridgenrc.com | www.owlridgenrc.com
[Confidentiality Notice](#)

From: [Josh Nadell](#)
To: [Angela Ludwick](#)
Cc: [Brooke Therrien](#); [Cheyenne Dibert](#)
Subject: Re: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan
Date: Thursday, February 22, 2024 11:25:52 AM
Attachments: [image001.png](#)

[External]

Received.

Thank you.

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Thursday, February 22, 2024 11:19 AM
To: Josh Nadell <josh@gzcorporation.org>
Cc: Brooke Therrien <btherrien@owlridgenrc.com>; Cheyenne Dibert <dibertc@doyon.com>
Subject: RE: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Thanks Josh. I am confirming you received the referenced letter (from Andrew Bielakowski) below, because it was attached in my original email just in case you did not receive it via mail.

I am including it again to make sure you have received it.

Thank you,

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
www.doyon.com

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From: Josh Nadell <josh@gzcorporation.org>
Sent: Thursday, February 22, 2024 10:18 AM
To: Angela Ludwick <ludwicka@doyon.com>
Subject: Re: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

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Sorry Angela. Tied up this week.

No, I did not receive the letter from Andrew Bielakowski at NTIA dated 2/7/2024 but did review the attached letter.

My name is Josh Nadell and I am the CEO of the Gwitchyaa Zhee Corporation in Fort Yukon, AK. The Corporation supports the Alaska FiberOptics Project and we have no concerns at this time.

I can be contacted at 907-317-8788 or by email at Josh@GZCorporation.org

Regards,

Josh Nadell

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Wednesday, February 21, 2024 4:23 PM
To: Josh Nadell <josh@gzcorporation.org>
Subject: RE: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Can you respond by how it's outlined in the red bullet points?

For example:

Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity,.

My name is Josh Nadell and I am the Executive Director for the GZ Corporation in Fort Yukon, Alaska. The GZ Corporation supports the Alaska FiberOptic Project, and we have no concerns at this time.

I can be reached at: 907-317-8788 or via email: Josh@gzcorp.org for further inquiries.

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

We have no concerns at this time.

Regards,

Josh Nadell
CEO
Gwitchyaa Zhee Corporation
907-317-8788

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Tuesday, February 20, 2024 2:00 PM
To: Shirley Fields <Shirley.fields@fortyukon.org>;
Melanie.Herbert@FortYukon.org <melanie.herbert@fortyukon.org>; Judy Peter
<Judypeter201@hotmail.com>; Josh Nadell <josh@gzcorporation.org>; Anthony Carroll
<gzshop9@gmail.com>
Cc: Brooke Therrien <btherrien@owlridgenrc.com>
Subject: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Good Afternoon,

Owl Ridge, subcontractor for the Alaska FiberOptic Project Segment 1, is proceeding with tasks related to development of a project specific **Programmatic Agreement (PA) and Cultural Resource Monitoring Plan** (CRMP). On February 7, 2024, letters notifying stakeholders of NTIA and Doyon's proposed plan to develop a PA and invite stakeholders to participate were sent out (attached).

Owl Ridge also requested assistance from Doyon in developing a broader stakeholder list for communities within a 200 mile-buffer around the project area. This list will only be used if human remains are identified. The 200 mile-buffer is required by the BLM.

On February 16, 2024, a draft of the Programmatic Agreement (PA) and Cultural Resources Management Plan was sent to the NTIA and Doyon for internal review. We anticipate publishing a public draft of these documents **no later than April 4, 2024, for stakeholder review.**

RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Fort Yukon received the attached letter from US Department of Commerce – National Telecommunications and Information Administration (see attached).

Please confirm "Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA. FYI~ His email and address are on the attached letter.

- Please provide any comments concerns or if you are aware of any other interested parties that should be included.
- We would like a statement from you that you, 1) "agree with the proposed Alaska FiberOptic project- segment 1." 2) State your role for Tanana, 3) comments /concerns/support, 3) provide email and phone number to be consulted.
- If you don't have a comment or do not wish to participate you can also state "decline to comment" or "I have no concerns and don't wish to comment."

Project

The NTIA grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific **Programmatic Agreement (PA)**. The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, **Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.**

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](http://arcgis.com).

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
www.doyon.com

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From: Angela Ludwick <ludwicka@doyon.com>
Sent: Wednesday, February 21, 2024 4:23 PM
To: Josh Nadell <josh@gzcorporation.org>
Subject: RE: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Can you respond by how it's outlined in the red bullet points?

For example:

Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity,.

My name is Josh Nadell and I am the Executive Director for the GZ Corporation in Fort Yukon, Alaska. The GZ Corporation supports the Alaska FiberOptic Project, and we have no concerns at this time.

I can be reached at: 907-317-8788 or via email: Josh@gzcorp.org for further inquiries.

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

We have no concerns at this time.

Regards,

Josh Nadell

CEO
Gwitchyaa Zhee Corporation
907-317-8788

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Tuesday, February 20, 2024 2:00 PM
To: Shirley Fields <Shirley.fields@fortyukon.org>;
Melanie.Herbert@FortYukon.org <melanie.herbert@fortyukon.org>; Judy Peter
<Judypeter201@hotmail.com>; Josh Nadell <josh@gzcorporation.org>; Anthony Carroll
<gzshop9@gmail.com>
Cc: Brooke Therrien <btherrien@owlridgenrc.com>
Subject: Fort Yukon - NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Good Afternoon,

Owl Ridge, subcontractor for the Alaska FiberOptic Project Segment 1, is proceeding with tasks related to development of a project specific **Programmatic Agreement (PA) and Cultural Resource Monitoring Plan** (CRMP). On February 7, 2024, letters notifying stakeholders of NTIA and Doyon's proposed plan to develop a PA and invite stakeholders to participate were sent out (attached).

Owl Ridge also requested assistance from Doyon in developing a broader stakeholder list for communities within a 200 mile-buffer around the project area. This list will only be used if human remains are identified. The 200 mile-buffer is required by the BLM.

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RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Fort Yukon received the attached letter from US Department of Commerce – National Telecommunications and Information Administration (see attached). **Please confirm "Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA.** FYI~ His email and address are on the attached letter.
- Please provide any comments concerns or if you are aware of any other interested parties that should be included.
- We would like a statement from you that you, 1) "agree with the proposed Alaska FiberOptic project- segment 1." 2) State your role for Tanana, 3) comments /concerns/support, 3) provide email and phone number to be consulted.
- If you don't have a comment or do not wish to participate you can also state "decline to comment" or "I have no concerns and don't wish to comment."

Project

The NTIA grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific **Programmatic Agreement (PA)**. The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, **Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.**

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](http://ALASKA.FIBEROPTIC.PROJECT(arcgis.com)).

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
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From: [Angela Ludwick](#)
To: [Brooke Therrien](#)
Subject: FW: Stakeholder letter - acknowledgement
Date: Friday, March 1, 2024 8:24:23 AM
Attachments: [image001.png](#)
[FiberOptic Project letter 2.29.24.pdf](#)

[External]

Hi Brooke,

See non-objection letter from Tozitna (Tanana Corp) attached.

Angela

From: Nina Heyano <president@tozitna.com>
Sent: Thursday, February 29, 2024 9:10 PM
To: Angela Ludwick <ludwicka@doyon.com>
Subject: Re: Stakeholder letter - acknowledgement

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

Hi Angela,

Here's the letter.

Nina

From: Angela Ludwick <ludwicka@doyon.com>
Date: Thursday, February 29, 2024 at 6:35 AM
To: Nina Heyano <president@tozitna.com>, Audrey George <audrey@ancaccounting.com>
Subject: Stakeholder letter - acknowledgement

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Good Morning,

Can you respond to this email please. This is part of the process for the FiberOptic process. We **need confirmation you received the attached letter** and state any concerns or no concerns at this time (see below).

Below is a sample response we would appreciate from the (Tribes/Person/City/Corp) getting fiber from the FiberOptic NTIA grant. ** the stakeholder letter is attached if you have not received it via mail.*

You can use the format below or provide the information in your own words. I'm just trying to make this part of the 106-process easier for the parties to respond to, so we can get the environmental work and Programmatic Agreement (PA) underway.

SAMPLE RESPONSE BELOW:

Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for the Office of Internet Connectivity,.

My name is _____ and I am _____ (position - Tribe/city/ Corporation/concerned party) from _____, Alaska. The _____ (name or entity or person) supports the Alaska FiberOptic Project, and *(we have no concerns at this time, or if you have a concern please provide your concerns) and (we wholeheartedly support the Alaska FiberOptic Project and I have no comment at this time or if you have comments, please provide).*

I can be reached at: 907-_____ or via email: _____ for further inquiries.

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
www.doyon.com

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From: [Angela Ludwick](#)
To: [Brooke Therrien](#)
Subject: FW: Rampart- NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan
Date: Thursday, March 21, 2024 8:59:28 AM
Attachments: [image001.png](#)

[External]

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Thursday, February 22, 2024 1:17 PM
To: Margaret Moses <margaret.moses99767@gmail.com>
Subject: RE: Rampart- NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

Thank you Maragret!

From: Margaret Moses <margaret.moses99767@gmail.com>
Sent: Thursday, February 22, 2024 1:15 PM
To: Angela Ludwick <ludwicka@doyon.com>
Subject: Re: Rampart- NTIA broadband project - PA - Programmatic Agreement & Cultural Resources Plan

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Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for the Office of Internet Connectivity,.

My name is Margaret Moses and I am the Tribal Administrator/Council Member from Rampart, Alaska. The Rampart Village Council supports the Alaska FiberOptic Project, and we have no concerns at this time.

I can be reached at: 907-358-3312 or via email: margaret.moses99767@gmail.com for further inquiries.

On Tue, Feb 20, 2024 at 1:52 PM Angela Ludwick <ludwicka@doyon.com> wrote:

Good Afternoon,

Owl Ridge, subcontractor for the Alaska FiberOptic Project Segment 1, is proceeding with tasks related to development of a project specific **Programmatic Agreement (PA) and Cultural Resource Monitoring Plan** (CRMP). On February 7, 2024, letters notifying stakeholders of NTIA and Doyon's proposed plan to develop a PA and invite stakeholders to participate were

sent out (attached).

Owl Ridge also requested assistance from Doyon in developing a broader stakeholder list for communities within a 200 mile-buffer around the project area. This list will only be used if human remains are identified. The 200 mile-buffer is required by the BLM.

On February 16, 2024, a draft of the Programmatic Agreement (PA) and Cultural Resources Management Plan was sent to the NTIA and Doyon for internal review. We anticipate publishing a public draft of these documents **no later than April 4, 2024, for stakeholder review.**

RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Rampart received the attached letter from US Department of Commerce – National Telecommunications and Information Administration (see attached). **Please confirm “Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA.** FYI~ His email and address are on the attached letter.
- Please provide any comments concerns or if you are aware of any other interested parties that should be included.
- We would like a statement from you that you, 1) “agree with the proposed Alaska FiberOptic project- segment 1.” 2) State your role for Tanana, 3) comments /concerns/support, 3) provide email and phone number to be consulted.
- If you don't have a comment or do not wish to participate you can also state “decline to comment” or “I have no concerns and don't wish to comment.”

Project

The NTIA grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon’s Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific **Programmatic Agreement (PA)**. The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the **PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.**

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, **Tribes, and other interested parties that have an interest or concern about any cultural**

resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arccgis.com\)](http://ALASKA.FIBEROPTIC.PROJECT.arccgis.com).

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
www.doyon.com

LEADER In All We Do

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From: [Peter Anderson](#)
To: [Cheyenne Dibert](#)
Cc: [Angela Ludwick](#); [Brooke Therrien](#)
Subject: RE: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan
Date: Thursday, March 21, 2024 10:14:51 AM
Attachments: [image001.png](#)

[External]

Received.

Pete Anderson
Tribal Administrator
Native Village Of Minto
P.O. Box 58026 Minto, AK 99758
Office 907-798-7112
Cell 907-798-6003

From: Cheyenne Dibert <dibertc@doyon.com>
Sent: Thursday, March 21, 2024 9:45 AM
To: Peter Anderson <ta@villageofminto.org>
Cc: Angela Ludwick <ludwicka@doyon.com>; Brooke Therrien <btherrien@owlridgenrc.com>
Subject: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan

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RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Fort Yukon received the attached letter from US Department of Commerce – National Telecommunications and Information Administration (see attached). **Please confirm “Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA.** FYI~ His email and address are on the attached letter.
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Project

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Pete, I will follow up with you either today or tomorrow. If you have any questions, we are happy to assist!

Thank You,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: [Peter Anderson](#)
To: [Cheyenne Dibert](#)
Cc: [Angela Ludwick](#); [Brooke Therrien](#)
Subject: RE: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan
Date: Tuesday, March 26, 2024 8:30:00 AM
Attachments: [image001.png](#)

[External]

Minto did receive the letter from the US Department of Commerce.
We have no concerns and we do not wish to comment.

Thank you,

Pete Anderson
Tribal Administrator
Native Village Of Minto
P.O. Box 58026 Minto, AK 99758
Office 907-798-7112
Cell 907-798-6003

From: Cheyenne Dibert <dibertc@doyon.com>
Sent: Thursday, March 21, 2024 11:03 AM
To: Peter Anderson <ta@villageofminto.org>
Cc: Angela Ludwick <ludwicka@doyon.com>; Brooke Therrien <btherrien@owridgenrc.com>
Subject: RE: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan

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RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Minto received the attached letter from the US Department of Commerce – National Telecommunications and Information Administration (see attached).
Please confirm “Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA. FYI~ His email and address are on the attached letter.
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If you don't have a comment or do not wish to participate you can also state “decline to comment” or “I have no concerns and don't wish to comment.”

I apologize, I accidentally listed Fort Yukon and Tanana in the email below. I have corrected both

to Minto.

Thanks,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



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Fairbanks, Alaska 99701
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Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: Peter Anderson <ta@villageofminto.org>
Sent: Thursday, March 21, 2024 10:15 AM
To: Cheyenne Dibert <dibertc@doyon.com>
Cc: Angela Ludwick <ludwicka@doyon.com>; Brooke Therrien <btherrien@owridgenrc.com>
Subject: RE: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

Received.

Pete Anderson
Tribal Administrator
Native Village Of Minto
P.O. Box 58026 Minto, AK 99758
Office 907-798-7112
Cell 907-798-6003

From: Cheyenne Dibert <dibertc@doyon.com>
Sent: Thursday, March 21, 2024 9:45 AM
To: Peter Anderson <ta@villageofminto.org>
Cc: Angela Ludwick <ludwicka@doyon.com>; Brooke Therrien <btherrien@owridgenrc.com>
Subject: Minto- NTIA Broadband Project - PA - Programmatic Agreement & Cultural Resources Plan

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RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Fort Yukon received the attached letter from US Department of Commerce – National Telecommunications and Information Administration (see attached). **Please confirm "Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA. FYI~ His email and address are on the attached letter.**
- Please provide any comments concerns or if you are aware of any other interested parties that should be included.
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pursuant to Section 110(a)(2)(E) of the NHPA.

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Pete, I will follow up with you either today or tomorrow. If you have any questions, we are happy to assist!

Thank You,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



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www.doyon.com

Leader In All We Do

From: [Angela Ludwick](#)
To: [Brooke Therrien](#)
Subject: FW: Stakeholder letter - acknowledgement
Date: Thursday, March 21, 2024 4:37:00 PM
Attachments: [image001.png](#)

[External]

Gloria George with City of Tanana below.

From: Gloria George <clerk@cityoftanana.com>
Sent: Thursday, February 29, 2024 1:38 PM
To: Angela Ludwick <ludwicka@doyon.com>
Subject: Re: Stakeholder letter - acknowledgement

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

Yes I received it.

On Wed, Feb 28, 2024 at 4:13 PM Angela Ludwick <ludwicka@doyon.com> wrote:

Hi Gloria,

Can you respond to this email please. This is part of the process for the FiberOptic process. We need confirmation you received the attached letter and state any concerns or no concerns at this time (see below).

Below is a sample response we would appreciate from the (Tribes/Person/City/Corp) getting fiber from the FiberOptic NTIA grant. * the stakeholder letter is attached if you have not received it via mail.

You can use the format below or provide the information in your own words. I'm just trying to make this part of the 106-process easier for the parties to respond to, so we can get the environmental work and Programmatic Agreement (PA) underway.

SAMPLE RESPONSE BELOW:

Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for the Office of Internet Connectivity,

My name is _____ and I am _____ (position - Tribe/city/ Corporation/concerned party) from _____, Alaska. The _____ (name or entity or person) supports

the Alaska FiberOptic Project, and (*we have no concerns at this time, or if you have a concern please provide your concerns*) and (*we wholeheartedly support the Alaska FiberOptic Project and I have no comment at this time or if you have comments, please provide*).

I can be reached at: 907-_____ or via email:
_____ for further inquiries.

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
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--
*Gloria George
Interim City Clerk
City of Tanana
PO Box 249
Tanana, AK 99777*



From: [Angela Ludwick](#)
To: [Annie Silas](#); [Cheyenne Dibert](#)
Cc: [Brooke Therrien](#)
Subject: RE: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan
Date: Wednesday, April 3, 2024 3:07:32 PM
Attachments: [image001.png](#)

[External]

Hi Annie,

It just so happens that Minto falls into the 200-mile buffer zone, so we are required to include Minto in the consultation. The project does not cross over any of Minto's land. Basically, the fiber runs along the haul road to the bridge and goes up to Stevens, Beaver, and Ft Yukon and down to Rampart and Tanana.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.

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Angela

From: Annie Silas <annie@sethcorporation.com>
Sent: Wednesday, April 3, 2024 2:58 PM
To: Cheyenne Dibert <dibertc@doyon.com>
Cc: Angela Ludwick <ludwicka@doyon.com>; btherrien@owlridgenrc.com
Subject: RE: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan

[External Mail - CAUTION: Do not open unexpected attachments or links.]

Hello Cheyenne,

Yes, I received a copy of the letter from NTIA dated 2-7-24 from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity.

My concern is if there a better map. Or can you confirm if the project will cross our land and if so where and when? How much

I will share this with my board and provide you with any responses I may receive.

Annie Silas

Office Manager

<https://seth-de-ya-ah.com/>

907-457-1061

From: Cheyenne Dibert <dibertc@doyon.com>

Sent: Thursday, March 21, 2024 2:07 PM

To: Annie Silas <annie@sethcorporation.com>

Cc: Angela Ludwick <ludwicka@doyon.com>; btherrien@owlridgenrc.com

Subject: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan

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- Please provide any comments or concerns or if you are aware of any other interested parties that should be included.
- We would like a statement from you that you, 1) "agree with the proposed Alaska FiberOptic project- segment 1." 2) State your role for Seth De Ya Ah Corporation, 3) comments /concerns/support, 3) provide email and phone number to be consulted.
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Annie, I will follow up with you tomorrow. If you have any questions, we are happy to assist!

Thank You,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



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Fairbanks, Alaska 99701
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Leader In All We Do

Cheyenne Dibert

Government & Rural Affairs Coordinator I



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Leader In All We Do

From: [Angela Ludwick](#)
To: [Annie Silas](#); [Brooke Therrien](#); [Cheyenne Dibert](#)
Subject: RE: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan
Date: Wednesday, April 3, 2024 3:26:11 PM
Attachments: [image001.png](#)

Oh good! I'm glad Brooke sent you a map to access.

I agree with you about this project benefitting the interior. It's a great opportunity.

Angela

From: Annie Silas <annie@sethcorporation.com>
Sent: Wednesday, April 3, 2024 3:20 PM
To: Brooke Therrien <btherrien@owlridgenrc.com>; Cheyenne Dibert <dibertc@doyon.com>
Cc: Angela Ludwick <ludwicka@doyon.com>
Subject: RE: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan

[**External Mail - CAUTION: Do not open unexpected attachments or links.**]

Great, this link, worked. I tried Angela's link, but it required log in credentials.
I appreciate the map; it looks like this will follow the highway basically. Right?

I understand this excerpt from Angela's email:

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, **Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.**

The map that can zoom in closer helps us determine if this project will cross **any cultural resources, historic properties, or traditional cultural sites.**

I honestly believe this project will help the interior in more ways than one.

Thank you,

Annie Silas

Office Manager

<https://seth-de-ya-ah.com/>

[907-457-1061](tel:907-457-1061)

From: Brooke Therrien <btherrien@owlridgenrc.com>
Sent: Wednesday, April 3, 2024 3:12 PM
To: Annie Silas <annie@sethcorporation.com>; Cheyenne Dibert <dibertc@doyon.com>
Cc: Angela Ludwick <ludwicka@doyon.com>

Subject: RE: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan

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[Internal]

Hi Annie,

Yes, in addition to the map that was attached to the letter, there is an online web-based mapper where you can zoom in to see the proposed fiber alignment. A link to that mapper is on page 2 of the letter. I have also linked it below.

<https://ornrc.maps.arcgis.com/apps/webappviewer/index.html?id=789273d33e1b46678fbbd118ebb381d1>

At this point, I do not believe the proposed project will cross your land but if you have conflicting information or any concerns please reach out. Between Fairbanks and the Yukon River Bridge, the alignment primarily follows the existing highway corridor and is located within the DOT&PF right-of-way with a few exceptions.

Thanks

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Annie Silas <annie@sethcorporation.com>
Sent: Wednesday, April 3, 2024 2:58 PM
To: Cheyenne Dibert <dibertc@doyon.com>
Cc: Angela Ludwick <ludwicka@doyon.com>; Brooke Therrien <btherrien@owlriddenrc.com>
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[External]

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Office Manager

<https://seth-de-ya-ah.com/>
[907-457-1061](tel:907-457-1061)

From: Cheyenne Dibert <dibertc@doyon.com>

Sent: Thursday, March 21, 2024 2:07 PM

To: Annie Silas <annie@sethcorporation.com>

Cc: Angela Ludwick <ludwicka@doyon.com>; btherrien@owlridgenrc.com

Subject: Seth De Ya Ah Corporation- NTIA Broadband Project -PA - Programmatic Agreement & Cultural Resources Plan

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Good Afternoon,

Owl Ridge, subcontractor for the Alaska FiberOptic Project Segment 1, is proceeding with tasks related to development of a project specific **Programmatic Agreement (PA) and Cultural Resource Monitoring Plan** (CRMP). On February 7, 2024, letters notifying stakeholders of NTIA and Doyon's proposed plan to develop a PA and invite stakeholders to participate were sent out (attached).

Owl Ridge also requested assistance from Doyon in developing a broader stakeholder list for communities within a 200 mile-buffer around the project area. This list will only be used if human remains are identified. The 200 mile-buffer is required by the BLM.

On February 16, 2024, a draft of the Programmatic Agreement (PA) and Cultural Resources Management Plan was sent to the NTIA and Doyon for internal review. We anticipate publishing a public draft of these documents **no later than April 4, 2024, for stakeholder review.**

RE: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project)

- I am checking to see if Seth De Ya Ah Corporation received the attached letter from the US Department of Commerce – National Telecommunications and Information Administration (see attached). **Please confirm "Yes, I received the stakeholder letter from NTIA dated February 7th from Andrew Bielakowski, Environmental Program Officer for Office of Internet Connectivity- NTIA.** FYI~ His email and address are on the attached letter.
- Please provide any comments or concerns or if you are aware of any other interested parties that should be included.
- We would like a statement from you that you, 1) "agree with the proposed Alaska FiberOptic project- segment 1." 2) State your role for Seth De Ya Ah Corporation, 3) comments /concerns/support, 3) provide email and phone number to be consulted.
- If you don't have a comment or do not wish to participate you can also state "decline to comment" or "I have no concerns and don't wish to comment."

Project

The NTIA grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific **Programmatic Agreement (PA)**. The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, **Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.**

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](http://ALASKA.FIBEROPTIC.PROJECT(arcgis.com)).

Annie, I will follow up with you tomorrow. If you have any questions, we are happy to assist!

Thank You,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
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Cell: 907-799-4198
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Leader In All We Do

From: [Cheyenne Dibert](#)
To: [Brooke Therrien](#)
Cc: [Angela Ludwick](#); [Sarah Obed](#)
Subject: Village Connection Webinar Invitation
Date: Wednesday, April 3, 2024 3:28:58 PM
Attachments: [Outlook-3daxtkog.png](#)

[External]

Brooke,

I have copied and pasted the webinar invitation that was included in our monthly village connection e-newsletter. All of the federally recognized tribes in the Doyon region are included in the listserv. All village corporations in the Doyon region are also a part of this listserv. This invitation was sent out at 10:00 a.m. on 4/3/2024.

Please join Doyon, National Telecommunications and Information Administration (NTIA), and Alaska Communications, for updates on the FiberOptic Project and an opportunity for consultation with NTIA!

Doyon, in partnership with Alaska Communications, is connecting five Alaskan communities along the Yukon River including, Beaver, Fort Yukon, Rampart, Stevens Village, and Tanana, with affordable, high-speed internet. This Project is referred to as segment one of the Alaska FiberOptic Project. The project, when fully funded and complete, will connect villages across the Doyon and Calista regions with high-speed internet.

Attendees of this webinar will hear an update on the status of the project and have a chance to engage in consultation on the project's Pragmatic Agreement (PA). This is part of the consultation process under Section 106 of the National Historic Preservation Act. The PA enables Doyon and the NTIA to proceed with the completion of the Environmental Assessment under the National Environmental Policy Act.

You are invited to a Zoom meeting.
When: Apr 17, 2024, 02:00 PM Alaska

Register in advance for this meeting:
<https://us06web.zoom.us/meeting/register/tZYpc-Cgpz4rH9fJsY6Quf6DmNFGZK0zXAnU>

After registering, you will receive a confirmation email containing information about joining the meeting.

For any questions or comments, please get in touch with the Doyon External Affairs Department at 907-459-2105 or dibertc@doyon.com •

I hope this works for you. Please let me know if you need anything else.

Best,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska
99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: [Cheyenne Dibert](#)
Cc: [Brooke Therrien](#); [Angela Ludwick](#)
Subject: FiberOptic Project Update and NTIA Opportunity for Consultation
Date: Friday, April 12, 2024 2:35:42 PM
Attachments: [image001.png](#)

[External]

Happy Friday Village Corporation and Council leaders,

Please join Doyon, National Telecommunications and Information Administration (NTIA), and Alaska Communications, for updates on the FiberOptic Project and an opportunity for consultation with NTIA! The External Affairs Department at Doyon Limited has scheduled a webinar for **Wednesday, April 17, 2024, from 2:00 p.m. to 3:00 p.m.**

Doyon, in partnership with Alaska Communications, is connecting five Alaskan communities along the Yukon River including, Beaver, Fort Yukon, Rampart, Stevens Village, and Tanana, with affordable, high-speed internet. This project is referred to as Segment One of the Alaska FiberOptic Project. The project, when fully funded and complete, will connect villages across the Doyon and Calista regions with high-speed internet.

Attendees of this webinar will hear an update on the status of the FiberOptic project and have a chance to engage in consultation on the project's Programmatic Agreement (PA). This is part of the consultation process under Section 106 of the National Historic Preservation Act. The PA enables Doyon and the NTIA to proceed with the completion of the Environmental Assessment under the National Environmental Policy Act.

Please register for the webinar by using the link below.

You are invited to a Zoom meeting.
When: Apr 17, 2024, 02:00 PM Alaska

Register in advance for this meeting:

<https://us06web.zoom.us/meeting/register/tZYpc-Cgpz4rH9fJsY6Quf6DmNFGZK0zXAnU>

After registering, you will receive a confirmation email containing information about joining the meeting.

There will be time for Q&A at the end of the webinar. This will give your tribe or corporation a chance to include your input on this project.

Please reach out to me if you have any questions or comments.

Best,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: [Cheyenne Dibert](#)
Cc: [Brooke Therrien](#); [Angela Ludwick](#)
Subject: REMINDER: FiberOptic Project Update and NTIA Opportunity for Consultation
Date: Wednesday, April 17, 2024 8:59:10 AM
Attachments: [image001.png](#)

[External]

Good morning, Village Corporation and Council leaders!

Join us today to hear from Doyon, National Telecommunications and Information Administration (NTIA), and Alaska Communications, for updates on the FiberOptic Project and an opportunity for consultation with NTIA! The External Affairs Department at Doyon Limited has scheduled a webinar for today, **Wednesday, April 17, 2024, from 2:00 p.m. to 3:00 p.m.**

Doyon, in partnership with Alaska Communications, is connecting five Alaskan communities along the Yukon River including, Beaver, Fort Yukon, Rampart, Stevens Village, and Tanana, with affordable, high-speed internet. This project is referred to as Segment One of the Alaska FiberOptic Project. The project, when fully funded and complete, will connect villages across the Doyon and Calista regions with high-speed internet.

Attendees of this webinar will hear an update on the status of the FiberOptic project and have a chance to engage in consultation on the project's Programmatic Agreement (PA). This is part of the consultation process under Section 106 of the National Historic Preservation Act. The PA enables Doyon and the NTIA to proceed with the completion of the Environmental Assessment under the National Environmental Policy Act.

Please register for the webinar by using the link below.

You are invited to a Zoom meeting.
When: Apr 17, 2024, 02:00 PM Alaska

Register in advance for this meeting:

<https://us06web.zoom.us/meeting/register/tZYpc-Cgpz4rH9fJsY6Quf6DmNFGZK0zXAnU>

After registering, you will receive a confirmation email containing information about joining the meeting.

Even if your tribe is not a part of the Segment One funding, you will still have a chance to speak on your part of the section of the project. Follow this link to visit the FiberOptic homepage for more information: [Welcome to the Alaska FiberOptic Project \(akfiberproject.com\)](http://www.akfiberproject.com).

Please reach out to me if you have any questions or comments.

Best,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

AGENDA



- Introductions
- Project Update
- Programmatic Agreement Consultation
- Q&A



PARTNERS



OUR GOAL



- Provide reliable, affordable, high-speed broadband in

- Fort Yukon
- Beaver
- Stevens Village
- Rampart
- Tanana



TECHNOLOGY



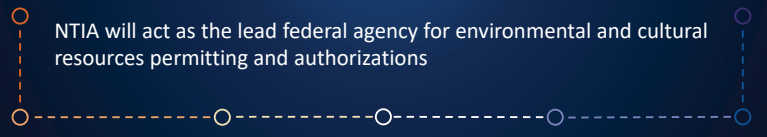
- Fiber optic cable, delivering up to Gigabit speeds
- Fiber to the home, school, healthcare clinics and all major facilities
- Most reliable and fastest technology available



FUNDING



- National Telecommunications and Information Administration (NTIA) Tribal Broadband Connectivity Program grant
- Funding provided by the Infrastructure, Investment and Jobs Act passed by Congress in 2021
- NTIA will act as the lead federal agency for environmental and cultural resources permitting and authorizations



AFFORDABILITY



- Alaska Communications will offer Home Internet at the same prices offered in Anchorage and Fairbanks
- Schools and healthcare clinics can expect reduced rates

ENVIRONMENTAL REVIEW



- Project will undergo standard environmental and permitting process
- Major permits and authorization include:
 - U.S. Army Corps of Engineers in accordance with Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act
 - Alaska Office of History and Archaeology – Consultation under the National Historic Preservation Act (NHPA)
 - Bureau of Land Management – Right of Way Authorization
 - National Marine Fisheries Service – Consultation for Essential Fish Habitat
 - Alaska Department of Natural Resources – Utility Easement
 - Alaska Department of Transportation & Public Facilities – Major Utility Permit
 - Alaska Department of Fish and Game – Fish Habitat Permit
- Fiber will be installed in the middle, deepest part of the river, at the bottom, away from the banks

PROGRAMMATIC AGREEMENT



- Per NHPA, NTIA is required to identify historic properties and assess potential impacts from the project.
- Due to timing and seasonality constraints, Doyon is unable to fully survey the project route prior to final approval.
- A Programmatic Agreement (PA) commits Doyon to completing any necessary cultural resources analyses prior to construction
- The PA is drafted and signed in consultation with stakeholders (federal and state agencies and Alaska Native groups) to address any concerns and complete the NHPA process

PA PROCESS



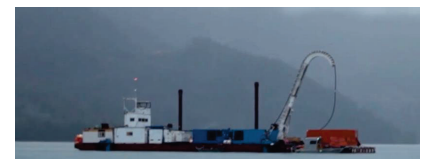
- Draft PA – In Progress
 - 30-day review period
 - Comments will be reviewed and addressed
- Final PA is drafted and sent to participating stakeholders
- Signatures are collected and requirements of the PA implemented

PROJECT SPECIFIC PA HIGHLIGHTS



- On the ground archaeology survey requirements
- Development of a Cultural Resource Management Plan
- Notification process to Tribes within 200 miles if there is an inadvertent discovery of cultural resources
- Cultural Resource Awareness Training for workers
- Notification forms to use if anything is found

RIVER INSTALLATION



SHORE LANDING



- Concrete beach manhole
- 4 feet x 4 feet
- Directional drill from riverbed to shore

ICE JAMS



- Coordinating with USGS for data and ice forecast
- Reviewed U.S. Army Corps of Engineers data
- Conducted Local/Traditional Knowledge interviews
- Comfortable with the hazard analysis



TIMELINE



- | | |
|------|--|
| 2023 | Federal and State permitting began
Field planning and community meetings |
| 2024 | Final permits expected
Ground construction from Fox to Yukon River
Ground construction in your community
Home device installation |
| 2025 | River construction and cable landings in each community
Home installation
Service available |

HOME DEVICE INSTALLATION



Outside Home Mount
6.5 x 10"



Inside Home Mount
4 x 3"

HOME INSTALLATION



- Installation in 2024 FREE, paid for by grant
- Installation after 2024, paid by homeowner
- No obligation to purchase service
- Just like getting an electric meter, you sign up for service, then pay
- Service available end of 2025, after river install

JOBS



2024

- Laundry support
- Brush clearing and tree trimmers
- Cooks and food preparation

2025

- Trucks and drivers to transport supplies from airport to river
- Water taxis to transport installation crews between vessels
- Small watercrafts and captains to transport fuel to install vessels

PROJECT TEAM



- NTIA – Federal Agency
- Doyon, Limited – Grant Recipient
- DeployCom – Construction Contractor
- Alaska Communications – Service Provider and Operator
- Owl Ridge – Permitting Support



WEBSITE



www.AKFiberOpticProject.com



SIGN UP



- Paper Form with Location/Address
- Sign Up Online at www.AKFiberOpticProject.com



COMMUNITY VISITS



- We'd like your feedback on timing for 2024 in-person community meetings



THANK YOU!



From: [Cheyenne Dibert](#)
To: [Brooke Therrien](#); [Angela Ludwick](#)
Subject: RE: Consultation webinar
Date: Tuesday, April 23, 2024 11:17:32 AM
Attachments: [image001.png](#)

Hi Brooke,

Here is the list of attendees from our webinar last week:

- Judith Evans: Administrator for Baan-O-Yeel Kon Corporation
- Randy Mayo: Board President of Dinyea Corporation
- Byron Turner: President of Deloycheet, Inc.
- Calvin McGinty: First Chief of Kaltag Traditional Council
- Annie Silas: Office Manager of Seth De Ya Ah Corporation
- Dena Sommer Pedebone: President of Gana-A'Yoo, Limited
- Edwin Bifelt: Co-Founder and CEO of Sundog Telecom
- Peter Hjelm: Stevens Village Council member
- Scott Wolfersheim: Tribal Administrator of Shageluk Tribal Council
- Luis Echenique: Grants Director for Louden Tribal Council
- Margaret Matthew: Tribal Administrator for Stevens Village Council
- Eda Carroll: Tribal Operations Manager of Gwichyaa Zhee Gwich'in Tribal Government
- Daphne Fields: a tribal member of Gwichyaa Zhee Gwich'in Tribal Government
- Patricia Salmon: Tribal Administrator of Chalkyitsik Traditional Council

Please let me know if you need any other information!

Thanks,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: Brooke Therrien <btherrien@owlridgenrc.com>
Sent: Monday, April 22, 2024 11:50 AM
To: Angela Ludwick <ludwicka@doyon.com>
Cc: Cheyenne Dibert <dibertc@doyon.com>
Subject: RE: Consultation webinar

[**External Mail** - CAUTION: Do not open unexpected attachments or links.]

[Internal]

Hi Angela,

Yes, we did. Thanks for checking in.

Cheyenne, can you please provide a list of attendees, and any meeting notes you might have. In my limited experience hosting zoom meeting I believe you can export the list of attendees relatively easily, correct?

Thanks

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Angela Ludwick <ludwicka@doyon.com>
Sent: Friday, April 19, 2024 10:36 AM
To: Brooke Therrien <btherrien@owlriddenrc.com>
Subject: Consultation webinar

[External]

Hi Brooke,

Did we get what is needed, to fulfill our consultation obligation, for the PA/CRMP when we had the Webinar?

Thank You,

Angela M. Ludwick

Angela M. Ludwick
Legal Administrative Assistant



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: [907-459-2000](tel:907-459-2000)
www.doyon.com

LEADER In All We Do

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From: [Cheyenne Dibert](#)
To: [Angela Ludwick](#)
Cc: [Brooke Therrien](#)
Subject: FiberOptic and NTIA Consultation Webinar
Date: Tuesday, April 23, 2024 3:51:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[April 2024 Doyon Community Visits - Alaska FiberOptic Project v6.pdf](#)

[External]

[FiberOptic and NTIA Consultation Opportunity Webinar Recording](#)

Hi all,

Thank you for participating in last week's webinar and providing feedback for this exciting project! It was a great turnout!

As requested, I have attached the slides and recording of the webinar. Let me know if you have difficulty accessing the link to the external sharing site.

If you have any questions, please reach out to me. I can also share the contacts of our presenters if needed.

Best,

Cheyenne Dibert

Government & Rural Affairs Coordinator I



Doyon, Limited
1 Doyon Place, Ste. 300
Fairbanks, Alaska 99701
Phone: 907-459-2105
Cell: 907-799-4198
www.doyon.com

Leader In All We Do

From: [Brooke Therrien](#)
To: [gbeyersd@blm.gov](#); [sara_boario@fws.gov](#); [cglassburn@blm.gov](#); [Head, Melissa M](#); [jimmy_fox@fws.gov](#); [Ryan.H.Winn@usace.army.mil](#); [Carolyn.H.Farmer@usace.army.mil](#); [judy.bittner@alaska.gov](#); [mckenzie.herring@alaska.gov](#); [douglas.vincent-lang@alaska.gov](#); [audra.braser@alaska.gov](#); [john.boyle@alaska.gov](#); [robert.sackinger@alaska.gov](#); [dot.commissioner@alaska.gov](#); [Martin, Kerri L \(DOT\)](#); [boyk@mosquitonet.com](#); [doreendeatonbkc@gmail.com](#); [randygmayo@gmail.com](#); [josh@gzcorporation.org](#); [cameron@sethcorporation.com](#); [president@tozitna.com](#); [manager@tozitna.com](#); [rpitka@beavercouncil.org](#); [melanie.herbert@fortyukon.org](#); [labaker@hotmail.com](#); [tribaladministrator@villageofminto.org](#); [margaret.moses99767@gmail.com](#); [margaret.matthew@tananachiefs.org](#); [svs.ira.council@gmail.com](#); [executivedirector@tananatribe.org](#); [dorothea.adams@catg.org](#); [mayor@fairbanks.us](#); [citymanager@fortyukon.us](#); [charliecampbell6060@gmail.com](#); [melissa.kellner@fnsb.gov](#); [realty_dept@tananachiefs.org](#); [sqinnis@fairbanksnative.org](#); [jreuther@alaska.edu](#); [tyhs@alaska.net](#); [Karchut, Jeremy M](#); [Annie Silas](#); [clerk@cityoftanana.com](#); [TA@villageofminto.org](#); [slwilson@blm.gov](#); [whedman@blm.gov](#); [thammond@blm.gov](#); [sringer@blm.gov](#)
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](#); [Amanda Pereira \(apereira@ntia.gov\)](#); [TODDA@doyon.com](#); [Molly Redilla \(redillam@doyon.com\)](#); [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#)
Subject: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Plan
Date: Thursday, April 18, 2024 11:36:00 AM
Attachments: [AKFOC Memo PA Summary \(DEP004-24-010F0\).pdf](#)
[image001.png](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is providing you with a link to the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

 [Draft PA and CRMP - Public Review](#)

On February 7, 2024, the NTIA initiated consultation with federal and state agencies, Tribes, and other interested parties that may have an interest or concern about any cultural resources, historic properties, or traditional cultural sites within the project area. Once you have reviewed the draft PA and CRMP please reply to this email by either:

- Advising that you want to participate in the development of the PA/CRMP.
- Advising that you decline to participate in the development of the PA/CRMP.

A brief memorandum summarizing comments received to date and the PA/CRMP review process is attached to this email. The link above contains a compiled PDF of the PA, CRMP, and other supporting documents. Word versions of the PA and CRMP have also been included for ease of editing and providing comments. Please use track changes and if providing comments please reply by **May 18, 2024**. A link from OneDrive has also been sent directly to you. In some cases, you may have to first access the link via that email prior to the link above working.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at btherrien@owlriddenrc.com.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlridgenrc.com | www.owlridgenrc.com

[Confidentiality Notice](#)

COMMENT AND RESPONSE MATRIX FOR THE DRAFT PROGRAMMATIC AGREEMENT AND CULTURAL RESOURCE MANAGEMENT PLAN

This comment and response matrix summarizes all comments received during the publication and review period for the draft Programmatic Agreement (PA) and Cultural Resources Management Plan (CRMP) which occurred between April 18 and May 18, 2024. Table 1 corresponds to the PA and Table 2 corresponds to the CRMP.

Table 1. PA Comment Response Matrix

Section	Author	Page and Section*	Comment	Response
RECITALS	BLM	Page 3; Paragraph 8	The project crosses lands owned by the State of Alaska; was DNR invited to participate?	Yes. DNR was invited and multiple emails were sent to Bruce Sackinger and John Boyle. No response was received.
RECITALS	Owl Ridge	Page 3; Paragraph 7 and 8	Whereas clauses will be updated pending participation of other consulting parties.	The following Whereas clauses were revised. “WHEREAS, DeployCom, the project contractor, who has operational control of project construction and, therefore, the NTIA has invited DeployCom to participate as an invited signatory in this Agreement pursuant to 36 CFR Part 800 6(3)(c), and DeployCom has elected to participate; and WHEREAS, the NTIA has invited the Beaver Village Council to participate as a concurring party in the Agreement pursuant to 36 CFR Part 800.6(c)(3) and the Beaver Village Council has elected to participate; and”
RECITALS	BLM	Page 4; Paragraph 2	Suggest including a clause that explains how local governments, interested parties, and the public have been consulted with, pursuant to 36 CFR 800.2(c)(3) and 36 CFR 800.2(c)(5). This would include NGOs such as Tanana Chiefs Conference.	The WHEREAS clause above includes outreach information and was revised to include reference to 36 CFR 800. See page 4 paragraph 1.
I. REVIEW STANDARDS AND REQUIREMENTS	BLM	Page 4; Section B	Include language recognizing that Tribes or other Indigenous knowledge holders may not meet these qualifications, but their expertise should be equally considered, consistent with 36 CFR 800.2(c)(2)(ii).	Revised paragraph to add: “Native American traditional knowledge is to be considered expert opinion. It is the knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or

Section	Author	Page and Section*	Comment	Response
				confidential to individual Native Americans, Indian Tribes, or the Native Hawaiian community.”
II. ADMINSTRATIVE STIPULATIONS	BLM	Global	Should this be expanded to include all federal agencies?	Global change. Revised from “ <i>NTIA and SHPO</i> ” to “ <i>Signatories and Concurring Parties</i> ” wherever appropriate.
II. ADMINSTRATIVE STIPULATIONS	BLM	Page 5; Section E	Suggest moving this up and/or incorporating this language into I.C so that all disclosure information is grouped together.	No changes made. Similar information is already presented in I.C. so moving it would be redundant. Although the topic is similar, I think both instances are dealing with a slightly nuanced version regarding administrative issues versus review issues.
II. ADMINSTRATIVE STIPULATIONS	BLM	Global	Global consistency check when referring to the parties that sign the PA. Suggest using “Signatories and Concurring Parties”	Revised. Global change was made.
II. ADMINSTRATIVE STIPULATIONS	BLM	Page 5; Section G	Based on experience, this isn’t reasonable or achievable. Suggest once or twice yearly updates of the contact list.	The NTIA prefers to send out updates to contact information as it is received. This language was less of an ask that agencies provide us with updated information immediately, and more of a statement that when we receive updates NTIA will provide the updated information in a timely fashion. So the burden is on NTIA, which we are happy to do, not the other agencies. No change was made.
II. ADMINSTRATIVE STIPULATIONS	BLM	Page 5; Section K	It seems like this would require a PA amendment; suggest clarifying that.	Clarification statement added. Revised paragraph to say “In the event another federal agency becomes a signatory, NTIA may delegate distribution responsibilities of reports, notices, or other activities outlined in this Agreement to that agency upon completing an Amendment to this PA. ”
III. DOYON AND DEPLOYCOM RESPONSIBILITIES	BLM	N/A	Added: “Doyon and DeployCom will ensure that any Project personnel found vandalizing, moving, or taking cultural materials, or violating any portion of ARPA (16 USC 470aa) or Alaska Statute 41.35.200, will be subject to appropriate disciplinary action up to and including immediate termination. In each instance, Doyon and DeployCom will consult with the NTIA, SHPO, and the landowner to determine appropriate legal actions.”	NITA declined to add this to the PA. Vandalizing, moving, or taking cultural materials is a crime and would be handled as appropriate. There are numerous other crimes that could occur during construction along a project corridor. It seems unusual to discuss this specifically when there are other similar crimes culturally related or not that could be in this document. It is also not consistent with the nature of this document.

Section	Author	Page and Section*	Comment	Response
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 7; Section A	What will be done if Tribes or other parties indicate the project will have an effect on previously undocumented cultural resources or places of cultural/religious significance in these areas?	If this happens, NTIA, Doyon, and DeployCom will address it using existing procedures for consultation, consistent with 36 CFR 800, that do not need to be spelled out in the PA. No changes were made.
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 8; Section D	Provide more details on what constitutes “archaeological survey and testing,” either here or in the CRMP. Minimally, reference should be given to OHA’s Historic Preservations Series technical document 18 “Survey Methods”: https://dnr.alaska.gov/parks/oha/hpseries/hp18.pdf	Additional text was added to the PA and the CRMP. “Research performed pursuant to this PA will follow the guidelines and standards issued by the Alaska SHPO.”
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 8; Section E	May or will? It seems that if the APE changes then it must be addressed appropriately to be in compliance with the NHPA.	Revised to state “will”
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 8; Section E	Wouldn’t this also require a PA amendment to ensure the APE description is kept up to date for the project? Or include language that these changes could be attached to the PA without an amendment?	Revised paragraph to include the following text: “Copies of this correspondence and documentation outlining the changes to the APE will be documented.”
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 8; Section E. ii	"How will NTIA fulfill Tribal consultation responsibilities under this workflow, pursuant to 36 CFR 800.2(c)(2)(ii)(A): “The agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking’s effects on such properties, and participate in the resolution of adverse effects. [emphasis added]"	The PA does not exclude Tribes or truncate tribal consultation in the event that cultural resources are identified during survey, determined significant, and will be impacted as a result of construction. If eligible sites are found and adverse impacts will occur, the PA establishes a process for mitigating adverse impacts where the Signatories, Concurring Parties, and Tribes will be consulted, consistent with 36 CFR 800.2(c)(2)(ii)(A).
IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES	BLM	Page 9; Section E. iii	Suggest having standard review periods of either 15 or 30 days.	Revised to state “15 days”

Section	Author	Page and Section*	Comment	Response
V. RESOLUTION OF ADVERSE EFFECTS	BLM	Page 10; Section A	This is a short development period. Suggest expanding to 15 or 30 days.	Revised to state “15 days”
V. RESOLUTION OF ADVERSE EFFECTS	BLM	Page 10; Section A	Development of mitigation also requires consultation with Tribes. How will that be done?	Correct. As stated above, Tribes would be included in consultation for development of mitigation, consistent with 36 CFR 800.2(c)(2)(ii)(A). Revised paragraph to include the following text: “To the extent practicable, Doyon and DeployCom will develop or modify Project design and construction methods to avoid historic properties.”
V. RESOLUTION OF ADVERSE EFFECTS	BLM	Page 10; Section B	This is a short review period. Suggest expanding to 15 or 30 days.	Revised to state “15 days”
VI. INITIATION OF CONSTRUCTION AND STOP WORK ORDERS	DNR OHA	Page 10/11; Sections A/B/C/D	The need for monitoring may come out of identification efforts and/or as a result of an inadvertent discovery. Currently, we aren’t proposing areas to monitor. Recommend inserting mentions of potential need for monitoring as a minimization method as determined through consultation—and then referring to the sections of the CRMP.	Revisions were made adding reference to the “potential need for monitoring as a minimization method as determined through consultation”
VII. CURATION	BLM	Page 11; Section A	Not sure which party should appropriately assume curation costs, but it should not be the landowner/manager.	Revised to state Doyon.
VII. CURATION	DNR OHA	Page 11; Sections A through G	Since identification is occurring after NTIAs approval---how does this work?	I think there was some confusion on the wording and ordering of the paragraph. BLM provided numerous edits to this section and upon further discussion this section was revised significantly.
VIII. POST-REVIEW DISCOVERIES	BLM	Page 12/13; Section A	This isn’t a large enough buffer. Suggest 50 meters/165 feet.	Doyon and DeployCom will only have landowner access to the construction corridor; therefore, a 50-meter-buffer would put them outside of what they have permission to access. 100 feet is a fairly standard buffer size and is generally adequate for protective purposes. The buffer has been revised to state 100 feet. This is now consistent across both the PA and CRMP.
VIII. POST-REVIEW DISCOVERIES	BLM	Page 12; Section A	Which federal agency? NTIA or federal land manager?	Revised to say the following: “NTIA, SHPO, and land managing agency’s authorized official, where appropriate.”
VIII. POST-REVIEW DISCOVERIES	BLM	Page 13; Section A	Include cross-reference to the human remains discovery plan here.	Revised to state the following: “Doyon will also comply with applicable state and local laws regarding the discovery of human remains as discussed in Section 6.4 of the CRMP.”

Section	Author	Page and Section*	Comment	Response
VIII. POST-REVIEW DISCOVERIES	BLM	Page 13; Section B	This is too small to adequately account for potential effects. It should minimally be a 50 meter/165 foot radius.	See response above. The buffer has been revised to state 100 feet. This is now consistent across both documents.
VIII. POST-REVIEW DISCOVERIES	BLM	Page 13; Section B	What is a “Discovery Plan.” Is this something besides the standard “inadvertent discovery plan” that is already being referenced?	Revised. Update to reference to an Inadvertent Discovery Plan.
VIII. POST-REVIEW DISCOVERIES	BLM	Page 13; Section C	This is an extremely short time-frame. Suggest expanding to 10 calendar days.	For many of the reasons identified above regarding the need to protect sites as well as to not leave active construction sites open, it is advantageous to make these initial determinations in a timely fashion. No change made.
VIII. POST-REVIEW DISCOVERIES	BLM	Global	Global: use consistent formatting for CFR and USC references.	Global revisions applied.
VIII. POST-REVIEW DISCOVERIES	DNR OHA	Page 12/13; Section A through D	Would like this language, and the language in the CRMP to mimic each other—or have this section simplified to refer to the inadvertent discovery section of the CRMP.	BLM made substantial revisions to this section, all of which were accepted, nullifying the OHA’s comment.
XI. AMENDMENTS	BLM	Page 15; Section A	There should be a way for the lead federal agency and SHPO to make needed amendments to the PA without requiring the consensus of all other Signatories.	This section has been revised.
XI. AMENDMENTS	BLM	Page 15; Section D	It seems like this would require a PA amendment to make the delegation of authority clear.	Clarifying language has been added to include: “In the event another federal agency becomes a signatory, NTIA may delegate distribution responsibilities of reports, notices, or other activities outlined in this Agreement to that agency, which will require that an Amendment to this PA be executed. ”
XIII. DURATION OF AGREEMENT	BLM	Page 16; Section A	Suggest limiting this to NTIA and SHPO	Revised to limit only to NTIA and SHPO.
ATTACHMENT D	BLM	Attachment D	Suggest including a column with land manager/owner	Column added.
ATTACHMENT D	DNR OHA	Attachment D	Would include table or narrative indicating where design changes were made to avoid/minimize as in the CRMP	This information is in Attachment D of the PA as well as the CRMP. No change made.
ATTACHMENT F	DNR OHA	Attachment F	Include response, or no response/objection	Information added to Attachment F.

* Page and Section locations correspond to page numbers in the revised PA.

Abbreviations: APE = Area of Potential Effect; ARPA = Archaeological Resources Protection Act; BLM = Bureau of Land Management; CFR = Code of Federal Regulations; DNR OHA = Alaska Department of Natural Resources, Office of History and Archaeology; NGO = Non-Governmental Organization; NTIA = National Telecommunications and Information Administration; SHPO = State Historic Preservation Officer; USC = United States Code

Table 2. CRMP Comment Response Matrix

Section	Author	Page and Section	Comment	Replies
Title Page	BLM	Title Page	In the PA this is referenced as Attachment E; this should have that clearly marked on the title page, along with reference to the PA.	Revised with the following statement: “NOTE TO READERS: THIS CULTURAL RESOURCES MANAGEMENT PLAN IS EXHIBIT E OF THE DOCUMENT TITLED: PROGRAMMATIC AGREEMENT BY AND AMONG THE NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION, THE ALASKA STATE HISTORIC PRESERVATION OFFICE, AND DOYON, LIMITED, DEPLOYCOM, INC. REGARDING THE ALASKA FIBEROPTIC PROJECT”
2.1 Location	BLM	Page 1; Section 2.1	Suggest including link to web map here.	Revised. Link to web map has been added.
3 POTENTIAL PROJECT EFFECTS	BLM	Page 5; Section 3	This is an assumption. This assessment would be made during the assessment of adverse effects phase (36 CFR 800.5).	Determinations on different project components or cultural resource elements can be made in a phased approach. NTIA has made this determination in the materials previously provided. No change made.
5 FIELDWORK & MONITORING	BLM	Page 9; Section 5	Provide more details on what is required for the surveys. Minimally, reference should be given to OHA’s Historic Preservations Series technical document 18 “Survey Methods”: https://dnr.alaska.gov/parks/oha/hpseries/hp18.pdf	Revised. Additional details and clarifications have been added to this section.
6.4 Human Remains Inadvertent Discovery	BLM	Page 11; Section 6.4	Check cross references.	Revised and updated.
6.4 Human Remains Inadvertent Discovery	BLM	Page 11; Section 6.4	This seems like a long time. Recommend same day or within 12 hours.	Revised text to include the following: “As immediately as practicable, but not later than 24 hours following an inadvertent discovery,...”
6.4 Human Remains Inadvertent Discovery	BLM	Page 12; Section 6.4	Review all NAGPRA CFR references for consistency with the new regulations that went into effect on 1/12/2024	References have been reviewed and are up to date.
6.4 Human Remains Inadvertent Discovery	BLM	Page 12/13; Section 6.4	This section appears to have been copied and pasted from another document. Review for consistency with this project. As the lead federal agency, NTIA would be responsible for non-NAGPRA human remains discoveries across the project.	The section has been revised and editorial changes accepted.
7 COLLECTION AND CURATION PROTOCOLS FOR CULTURAL	BLM	Page 13; Section 7	This seems to be the wrong heading for the following section? This section should be moved to Section 6 of the CRMP.	No revisions made. Previous Section deals with human remains; Section 7 deals with inadvertent discoveries that are not human remains.

Section	Author	Page and Section	Comment	Replies
RESOURCES (NOT HUMAN REMAINS)				
EXHIBITS	BLM	Exhibit 4	If the project is going to have this, then it should be specifically called out in the PA somewhere.	No revisions made. There does not seem to be the need to specifically reference all construction-related field awareness trainings and practices in the PA. This is consistent with the PA and CRMP.
EXHIBITS	BLM	Exhibit 6-2	Too small; increase the size.	See response above. The buffer size is consistent across both documents.
Step 4—Human Remains: Develop a Plan of Action for Treatment of the Remains	BLM	Exhibit 6-2	Ensure this is consistent with the detailed information about photographic NAGPRA remains.	References to photographs has been deleted. The new NAGPRA regulations are silent about photographs.

* Page and Section locations correspond to page numbers in the revised CRMP.

Abbreviations: BLM = Bureau of Land Management; CFR = Code of Federal Regulations; NAGPRA = Native American Graves Protection and Repatriation Act; NTIA = National Telecommunications and Information Administration; OHA = [State of Alaska] Office of History and Archaeology

Date	Agency	POC	Number	Outreach	Notes
May 6, 2024	BLM	Crystal Glassburn	(907) 474-2240	Voicemail	Provided comments on May 16, 2024
May 6, 2024	USFWS	Jeremy Karchut		Email	Declined via email
May 6, 2024	SHPO	McKenzie Herring	(907) 269-8726	Verbal Discussion	Reviewing documents this week.
May 6, 2024	ADF&G	Audra Brase	(907) 459-7282	Verbal Discussion	Audra replied May 10, 2024, waiting comments from other departments.
May 6, 2024	DOT	Kerri Martin	(907) 451-5289	Voicemail	
May 6, 2024	City of Fairbanks	John Obrien	(907) 459-6747	Voicemail/ email	
May 7, 2024	FNSB	Melissa Kellner	(907) 459-1252	Voicemail	
May 7, 2024	TCC	Bob Sattler	(907) 452-8251 ext. 3242	Verbal Discussion w/ Admin	Spoke with administration. Message sent to Bob. Phone call with Bob on May 9, 2024. Confirmed receipt and is reviewing.
May 7, 2024	CATG	Dorothea Adams	(907) 662-7511	Voicemail	
May 7, 2024	FNA	Steve Ginnis	(907) 452-1648	Voicemail	Voicemail left with Chaylene (last name?). She is Steve's Executive coordinator.
May 7, 2024	UAMN	Josh Reuther	(907) 4746945	Voicemail	
May 7, 2024	Yukon-Tanana Historical Society	Ron Inouye	(907) 456-8947	Verbal Discussion	Spoke with Elizabeth Cook (Administrator). She is forwarding the information today.
May 7, 2024	BOYK	Marjorie Merry	(907) 456-6529	Phone number inactive.	
May 7, 2024	Beaver Corp	Doreen Deaton	(907) 628-6126	Verbal Discussion w/ Admin	Busy signal. Main office. Doreen direct number is (907) 388-9903. Voicemail left at that number.
May 7, 2024	Dinyea Corp (Stevens Village)	Randy Mayo	(907) 699-2128	Verbal Discussion w/ Admin	Email resent. Preliminary confirmation that they decline. Sent declining email on May 7, 2024.

May 7, 2024	GZ Corp	Josh Nadell		Verbal Discussion w/ Admin	Advised to contact via email. Email resent to Josh. Sent declining email on May 14, 2024.
May 8, 2024	Seth-De-Ya-Ah Corp	Annie Silas	(907) 457-1061	Verbal Discussion with Annie	Sent declining email.
May 8, 2024	Tozitna, Limited	Nina Heyano	(907) 366-7255	Phone/ no answer	
May 13, 2024	Beaver Village Council	Rhona Pitka	(907) 628-6126	Phone/ no answer	Will participate
May 8, 2024	GZGTG	Melanie Herbert	(907) 662-2581	Voicemail	
May 8, 2024	Native Village of Minto		(907) 789-7112	Phone number inactive.	
May 8, 2024	Rampart Tribal Council	Margaret Moses	(907) 358-3312	Verbal Discussion w/ Admin	Out of town until May 14, 2024, advised to send another email. Email sent May 8, 2024.
May 8, 2024	Stevens Village Council	Margaret Mathews	(907) 888-7414 (907) 478-7228	Voicemail/busy signal	
May 8, 2024	Tanana Tribal Council	Victor Joseph	(907) 366-7170	Verbal Discussion with Gladis	Email forwarded to Gladys on May 8, 2024.
May 8, 2024	USACE	Carolyn Farmer	(907)	Verbal Discussion with Carolyn	Waiting for Comments from SHPO
May 9, 2024	City of Fort Yukon		(907) 662-2479	Verbal Discussion with Admin	Verbal message left with admin
May 9, 2024	City of Tanana	Admin	(907) 371-9320	Verbal Discussion with Admin	Confirmed receipt and will review and reply via email.
May 16, 2024	DNR	Bruce Sackinger	(907)	Email sent	Bruce has been on vacation until May 13, 2024.

From: [Brooke Therrien](#)
To: [Brase, Audra L \(DFG\)](#); [Vincent-Lang, Douglas S \(DFG\)](#); [Sackinger, Robert B \(DNR\)](#); john.boyle@alaska.gov; [Judy Evans](#); [Doreen Deaton](#); [Nina Heyano \(president@tozitna.com\)](mailto:Nina.Heyano@tozitna.com); manager@tozitna.com; Melanie.Herbert@FortYukon.org; tribaladministrator@villageofminto.org; [Peter Anderson](#); [margaret.moses99767](mailto:margaret.moses99767@gmail.com); [Margaret Matthew](mailto:Margaret.Matthew@fairbanks.us); [executivedirector](mailto:executivedirector@tanana.com); executiveassistant@tanana.com; mayor@fairbanks.us; jobrien@fairbanks.us; citymanager@fortyukon.us; clerk@cityoftanana.com; [Charles Campbell](#); melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; bob.sattler@tananachiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; [Tanana-Yukon Historical Society](#)
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](mailto:Andrew.Bielakowski@firstnet.gov); [Amanda Pereira \(apereira@ntia.gov\)](mailto:Amanda.Pereira@ntia.gov); TODDA@doyon.com; [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#)
Subject: FW: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Plan
Date: Monday, May 20, 2024 10:14:00 AM
Attachments: [AKFOC Memo PA Summary \(DEP004-24-010F0\).pdf](#)
[image001.png](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is following up with you regarding the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

Copies of this information are linked in the email below, dated April 18, 2024. The NTIA is beginning to review comments received and preparing to develop final copies of the PA and CRMP. If you would like to participate, please let us know by **May 24, 2024**. If we do not hear from you by that date, we will assume that your agency is declining to participate.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at btherrien@owlridgenrc.com.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Brooke Therrien
Sent: Thursday, April 18, 2024 11:37 AM
To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; Head, [Melissa Mhead@blm.gov](mailto:Melissa.Mhead@blm.gov); jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.braser@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; Martin, Kerri L (DOT) <kerri.martin@alaska.gov>; boyk@mosquitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org;

melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribe.org; dorothea.adams@catg.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net; Karchut, Jeremy M <jeremy_karchut@fws.gov>; Annie Silas <annie@sethcorporation.com>; clerk@cityoftanana.com; TA@villageofminto.org; slwilson@blm.gov; whedman@blm.gov; thammond@blm.gov; sringer@blm.gov

Cc: Andrew Bielakowski (Andrew.Bielakowski@firstnet.gov) <Andrew.Bielakowski@firstnet.gov>; Amanda Pereira (apereira@ntia.gov) <apereira@ntia.gov>; TODDA@doyon.com; Molly Redilla (redillam@doyon.com) <redillam@doyon.com>; Angela Ludwick <ludwicka@doyon.com>; Doug Hudson <Dhudson@deploycom.com>; Glenn Ruckhaus <gruckhaus@owlridgenrc.com>; Paul Cartier <pcartier@owlridgenrc.com>

Subject: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Pan

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is providing you with a link to the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

 [Draft PA and CRMP - Public Review](#)

On February 7, 2024, the NTIA initiated consultation with federal and state agencies, Tribes, and other interested parties that may have an interest or concern about any cultural resources, historic properties, or traditional cultural sites within the project area. Once you have reviewed the draft PA and CRMP please reply to this email by either:

- Advising that you want to participate in the development of the PA/CRMP.
- Advising that you decline to participate in the development of the PA/CRMP.

A brief memorandum summarizing comments received to date and the PA/CRMP review process is attached to this email. The link above contains a compiled PDF of the PA, CRMP, and other supporting documents. Word versions of the PA and CRMP have also been included for ease of editing and providing comments. Please use track changes and if providing comments please reply by **May 18, 2024**. A link from OneDrive has also been sent directly to you. In some cases, you may have to first access the link via that email prior to the link above working.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at

btherrien@owlridgenrc.com.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlridgenrc.com | www.owlridgenrc.com

[Confidentiality Notice](#)

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

This Programmatic Agreement ("Agreement" or "PA") is entered into by and between the National Telecommunications and Information Administration ("NTIA"), an operating bureau of the U.S. Department of Commerce, the Alaska State Historic Preservation Office ("SHPO"), Doyon, Limited ("Doyon"), the U.S. Army Corps of Engineers ("USACE"), and the Bureau of Land Management ("BLM"), an operating bureau within the U.S. Department of the Interior. The NTIA, SHPO, Doyon, the USACE, and BLM are individually referred to herein as a "Party" and are collectively referred to herein as the "Parties."

RECITALS

WHEREAS, the NTIA is principally responsible for advising the President on telecommunications and information policy issues and administers grant programs that further the deployment and use of broadband and other technologies in America; and

WHEREAS, established by the Consolidated Appropriations Act, 2021, NTIA is charged with distributing nearly \$1 billion to eligible Tribal governments and entities to expand broadband access and adoption to historically unserved and underserved Tribal communities through the Tribal Broadband Connectivity Program ("TBCP"); and

WHEREAS, the NTIA on August 8, 2022, issued a financial assistance award through TBCP to Doyon, an Alaska Native Regional Corporation, to install a fiber optic network connecting five villages within Doyon's regional corporation boundary to provide much-needed infrastructure to rural communities; and

WHEREAS, the Alaska FiberOptic Project ("Undertaking" or "Project") consists of installation of approximately 468 miles of FOC including approximately 132 miles mostly buried between Fairbanks and the E.L. Patton Bridge, 316 miles buried in the Yukon River channel, and 20 miles buried around the Canyon Bypass route south of the Yukon River, and aerial installation on existing utility poles at each community served by the main fiber optic cable connecting residences, businesses, and offices; and

WHEREAS, Doyon has contracted DeployCom to install fiber optic cable ("FOC") between Fairbanks, Alaska and the E. L. Patton Bridge across the Yukon River and then to the communities of Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana, Alaska as depicted on the map entitled "**Attachment A: Project Location Map**"; and

WHEREAS, DeployCom proposes to install FOC in the existing Alaska Department of Transportation and Public Facilities (“DOT&PF”) right-of-way (“ROW”) flanking the Steese, Elliott, and Dalton highways to the E.L. Patton Bridge and to embed FOC in the channel of the Yukon River upstream to Fort Yukon and downstream to Tanana from the E. L. Patton Bridge, with a 20-mile-long Canyon Bypass south of Rampart Canyon across lands owned by the State of Alaska and Doyon; and

WHEREAS, the Undertaking requires the submittal of a permit application to the USACE, Alaska District under Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Waters Act (either through individual permits or through the USACE’s Nationwide Permit Program); and

WHEREAS, the Undertaking will require a permit from the U.S. Department of the Interior, BLM to deploy FOC through lands it manages adjacent to the Yukon River and along existing highway ROWs; and

WHEREAS, the NTIA has invited the USACE and BLM to participate as a Signatory in the Agreement pursuant to 36 CFR Part 800.6(c)(1); and

WHEREAS, NTIA has determined that the obligation of federal financial assistance would make this project an undertaking subject to review under Section 106 of the National Historic Preservation Act (“NHPA”), as codified at 54 USC 306108, and the NTIA has determined that the Undertaking has the potential to affect historic properties per 36 CFR Part 800.5(a)(1); and

WHEREAS, the NTIA has consulted with the SHPO pursuant to its responsibilities under Section 106 of the NHPA and its implementing regulations at 36 CFR Part 800 and notified the SHPO that it will act as lead federal agency on behalf of the USACE and BLM pursuant to 36 CFR 800.2(a)(2); and

WHEREAS, in a January 17, 2024, delegation memo, NTIA authorized Internet for All award recipients, including TBCP awardees, to gather information to identify and evaluate historic properties and to work with Signatories and Tribes to assess effects consistent with 36 CFR § 800.2(c)(4); and

WHEREAS, the NTIA, in consultation with the SHPO, established the Undertaking’s Area of Potential Effects (APE) for terrestrial and riverine construction activities as described in **Attachment B** and **Attachment C**; and

WHEREAS, the NTIA is phasing identification and evaluation of historic properties, and application of the criteria of adverse effect in accordance with 36 CFR Parts 800.4(b)(2) and 800.5(a)(3), respectively because the remote and rural location of the Undertaking has resulted in incomplete information¹ regarding the nature, location, distribution, and horizontal and vertical extent of cultural resources within the APE of the Project; and

¹ *The Alaska Heritage Resources Survey (“AHR”) database lists 40 cultural resources located within the APE, including 14 eligible or listed on the National Register of Historic Places (“NRHP”); and six unevaluated properties.*

WHEREAS, the NTIA has completed initial inventory and consultation efforts to ascertain the potential for various areas of the APE to contain historic properties and to gain consensus on minor, feasible changes to the FOC alignment that can avoid or minimize adverse effects on NRHP listed or eligible sites within the APE (**Attachment D**); and

WHEREAS, NTIA has developed a Cultural Resources Management Plan (“CRMP”) identifying measures to minimize or mitigate potential adverse effects on known and unknown historic properties that Doyon and DeployCom will follow in implementing the Undertaking (**Attachment E**); and

WHEREAS, in accordance with 36 CFR Part 800.14(b)(1)(ii), the NTIA has determined that execution of a Programmatic Agreement is appropriate because effects on historic properties cannot be fully determined prior to approval of this Undertaking; and

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

WHEREAS, NTIA notified the Advisory Council on Historic Preservation (“ACHP”) on February 6, 2024, regarding the development of this Agreement, and the ACHP has declined to participate; and

WHEREAS, the NTIA has invited Doyon to be a Signatory to this Agreement pursuant to 36 CFR Part 800.6(c)(2) and Doyon has elected to participate and agreed to carry out the Stipulations in this Agreement; and

WHEREAS, DeployCom, the project contractor, who has operational control of project construction and, therefore, the NTIA has invited DeployCom to participate as an invited Signatory in this Agreement pursuant to 36 CFR Part 800.6(3)(c), and DeployCom has elected to participate; and

WHEREAS, NTIA recognizes that the Federal Government has a unique legal relationship with Tribes² set forth in the U.S. Constitution, and that the implementing regulations require NTIA to consult with Tribes so that they may identify concerns about historic properties, advise on the identification and evaluation of historic properties of traditional religious, spiritual, or cultural importance, articulate their views on the Project’s effects on such properties, and to participate in the resolution of adverse effects, pursuant to 36 CFR 800.2(c)(3)(ii); and

WHEREAS, NTIA has made a good faith effort to consult with Tribes and has invited Tribal participation in the development of this Agreement pursuant to 36 CFR 800.2(c)(2)(ii)(A) (**Attachment F**); and

WHEREAS, the NTIA has invited the Beaver Village Council to participate as a Concurring Party in the Agreement pursuant to 36 CFR Part 800.6(c)(3) and the Beaver Village Council has elected to participate; and

² 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 (ANCSA) (43 USC 1602).

WHEREAS, NTIA has made a good faith effort to consult with local governments and other interested parties to participate in the development of this Agreement pursuant to 36 CFR 800.2(c)(3) and 36 CFR 800.2(c)(5) (**Attachment F**); and

WHEREAS, NTIA and Doyon have contacted thirty-one (31) state and federal agencies, federally recognized tribes, Alaska Native Claims Settlement Act Corporations and non-profit tribal corporations, and city and borough governments to consult about the project, and those organization names and their responses are listed in **Attachments F and G**; and

WHEREAS, the University of Alaska Museum of the North (“UAMN”) has agreed to serve as the repository to curate cultural materials that might be found in an unanticipated discovery during Project construction; and

NOW THEREFORE, the Parties agree that the Undertaking shall be implemented in accordance with the following stipulations to take into account the Undertaking's potential effects on historic properties and to comply with Section 106 of the NHPA.

STIPULATIONS

The NTIA shall ensure that the following stipulations are carried out according to the provisions set forth herein:

I. REVIEW STANDARDS AND REQUIREMENTS

- A. NTIA 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. NTIA 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). Native American traditional knowledge is to be considered expert opinion. It is the knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or confidential to individual Native Americans, Indian Tribes, or the Native Hawaiian community.
- C. NTIA will protect information about historic properties to the extent allowed by Section 304 of the NHPA (54 USC 470), 36 CFR 800.11(c) and other applicable laws and regulations. Section 304 requires consultation with the ACHP and the Keeper of the NRHP. Under the provisions of ARPA (54 USC 470hh) and the NHPA, site location information is restricted in distribution, disclosure of such information may be exempt from requests under federal and state freedom of information laws. NTIA is responsible for returning information to Tribes and for determining acceptable methods of information distribution.
- D. The SHPO will receive all technical reports and will retain location information about all cultural resources and historic properties, including properties of religious, spiritual, or cultural significance to Tribes identified during the

Project. This approach is consistent with its mission to identify and maintain inventories of cultural resources and historic properties [Section 101 of the NHPA (54 USC 302301) and A.S. 41.35.070(a)].

II. ADMINISTRATIVE STIPULATIONS

- A. The terms of this Agreement shall apply to the Alaska FiberOptic Project (Project), including any future design and APE changes not specified in the current permits, permit applications, or other Project documents.
 - i. DeployCom will be responsible for submitting any subsequent modifications for review.
 - ii. Doyon and DeployCom, in consultation with the other Signatories, may reevaluate the APE annually, should additional or new information on the Project become available based on engineering design changes, revised information regarding environmental impacts, or other reasons deemed appropriate.
- B. The terms of this Agreement may be applied to any branch lines extended from the main Yukon River channel fiber optic cable to additional communities not originally part of the Project provided that the Agreement has not expired.
- C. All references to “days” in this Agreement shall refer to calendar days, unless specifically identified as “business days.”
- D. Signatories and, to the extent applicable, Concurring Parties shall enforce the terms of this Agreement within each agency’s scope and shall incorporate this Agreement and its terms into any decision document, permit, or authorization they issue. Each agency shall notify the others within 5 days of identifying an instance of possible non-compliance with the terms and conditions of this Agreement or permit conditions as they relate to this Agreement. In such cases, NTIA, as the lead federal agency, will consult with the other Agreement Signatories, as needed to ensure that compliance is consistent with legal authorities.
- E. The Signatories and Concurring Parties recognize that certain information about historic properties and 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. NTIA and SHPO shall ensure that all actions and documentation prescribed by this Agreement are consistent with the non-disclosure requirements of these laws to the extent of their authority.
- F. Any of the Signatories and Concurring Parties may seek qualified independent expert consultation, through a third-party contractor, in order to fulfill the responsibilities under this Agreement, provided that the contractor meets requirements listed above in Stipulation I. *Standards*.
- G. Signatories and Concurring Parties to the Agreement shall provide contact information for this Agreement to NTIA. It is the responsibility of each Signatory and Concurring Party to immediately notify NTIA of any change in name, mailing address, email address, or phone number for any Concurring Party. Once received, NTIA will forward this information to all Signatories and Concurring Parties by email or mail within five (5) business days and will

- update the Agreement record of current contact names, organizations, and email addresses for Signatories and Concurring Parties for the Agreement.
- H. Email shall be an acceptable form of communication between the Signatories and Tribes and is an appropriate method of “notification” or “in writing” where it is called for in this Agreement, unless otherwise described. If a Signatory or Tribe does not have access to email or consistently available internet service, then NTIA will ensure that other forms of communication are pursued.
 - I. At any time prior to the end of any review period or submittal date associated with this Agreement, Signatories and Concurring Parties to this Agreement or Tribes may request additional time for review of documentation, preparation of guidance documents or submittals, or any other time-sensitive materials outlined in this Agreement by submitting their request in writing to NTIA. NTIA will consider the request and notify the reviewing parties of its decision to grant an extension at the earliest practicable time or within 5 days of its decision.
 - J. If a party does not provide written comments regarding a PA-related task or action within the designated time period, NTIA may determine a final decision on the action and proceed accordingly.
 - K. At any time throughout the life of the Agreement, any outside entity not initially part of this Agreement, may contact NTIA and request to become a Signatory. NTIA will consider any such request and notify the Signatories of the request, and NTIA’s decision. A new party signing the Agreement will not require an amendment to the document. Signatories added under this stipulation will be included in any and all distributions of reports, notices, or other communications outlined in this Agreement.
 - L. In the event that another federal agency, not initially a party to this Agreement, receives an application for funding/license/permit for the Project as described in this Agreement, that agency may fulfill its section 106 responsibilities by stating in writing that it concurs with the terms of this Agreement and notifying the Signatories that it intends to do so. Such an agreement shall be evidenced by execution of a Signature Page and filing with the ACHP, and implementation of the terms of this Agreement. In the event another federal agency becomes a Signatory, NTIA may delegate distribution responsibilities of reports, notices, or other activities outlined in this Agreement to that agency upon completing an Amendment to this PA.
 - M. The Signatories may execute this Agreement in counterparts, with a separate page for each Signatory. NTIA will distribute a complete final copy to all Signatories to the Agreement once the Agreement is signed.
 - N. For purposes of this Agreement, facsimile and electronic signatures of authorized representatives of the Parties, including such signatures in counterparts, are acceptable.
 - O. Names and contact information for each Party is referenced in **Attachment G**.

III. DOYON AND DEPLOYCOM RESPONSIBILITIES

- A. This Agreement and all its requirements are binding on Doyon and DeployCom, and its successors, heirs, and assigns. Doyon and DeployCom shall include a provision requiring compliance with the Agreement in any

- contract of sale or transfer of ownership or management of the Project.
- B. Doyon and DeployCom shall be responsible for funding and implementing, either directly or through qualified consultants or contractors, the work to ensure compliance with the terms of this Agreement. This work will be completed on behalf and at the direction of NTIA.
 - C. Doyon and DeployCom shall ensure that any persons conducting or supervising cultural resources work on their behalf hold all appropriate federal and/or state permits and/or authorizations for that work and meet Stipulation I: *Standards* for the applicable discipline.
 - D. Doyon and DeployCom and any contractors hired on their behalf will not retain sensitive information that Signatories or Tribes authorize them to collect, beyond the time needed to complete compliance with the terms of the Agreement. Sensitive information may include, but is not limited to, information about archaeological resources, sacred objects, features, artifacts, items of cultural patrimony, landscapes, or other types of information that have been determined by the Signatories or Tribes to be confidential and not for public disclosure.
 - E. Doyon and DeployCom will notify NTIA in the event of a Project design change which expands or reconfigures the APE or may involve effects on historic properties. Significant Project design changes which result in changes to the APE, or additional potential for effects to historic properties, will require an amendment to this Agreement (Stipulation XI).

IV. IDENTIFICATION, EVALUATION AND TREATMENT OF HISTORIC PROPERTIES

- A. The cultural resources inventory and analysis literature review of the Alaska FiberOptic Project riverine and terrestrial alignment in the Canyon Bypass corridor adequately identified historic properties within the APE in each of the five communities³ (Alaska Cultural Resources Consultants 2023). The SHPO has concurred that Project activities, including bringing the FOC onshore; stringing the FOC aurally on utility poles; and installing beach manholes and communications shelters, will not adversely affect any historic properties or contributing elements of identified historic districts. Cultural resource monitoring at each community is not required, provided that Doyon and DeployCom incorporate standard unanticipated discovery stipulations from the CRMP (**Attachment E**).
- B. Doyon and DeployCom will employ cable lay barge (“CLB”) protocols and procedures to avoid cultural resources when entrenching FOC in the Yukon River. The CLB will collect multibeam survey data as it travels upstream in the Yukon River and immediately prior to laying cable while travelling downstream. Any identified obstacles from the multibeam survey will be avoided by adjusting the FOC burial location to provide adequate separation between the cable and obstacle. This cable lay protocol protects the buried FOC

³ *The Study Area for the literature review was a corridor 1.5 miles wide either side of the alignment. The APE for the riverine portion of the Project is 100 feet either side of the planned cable lay in the bed of the Yukon River, 200 feet total in width. The APE for the terrestrial alignment in each community is a corridor 30 feet either side of the FOC centerline, 60 feet total in width. At river crossings in the Canyon Bypass, the APE is 100 feet wide at the streambank edge, narrowing to 60 feet wide, 100 feet upland of the streambank.*

and mitigates any possible effect on submerged cultural resources by avoidance. Any presently unknown submerged cultural resources in the Yukon River would be avoided by the CLB protocols and procedures and the SHPO has concurred that no further review of submerged cultural resources is required.

- C. Doyon and DeployCom will follow recommendations from the DOWL (2023) cultural resources inventory and analysis literature review for the 132-mile-long Terrestrial Corridor between Fairbanks, Alaska, and the E. L. Patton Yukon River Bridge.⁴ The literature review report recommended feasible project redesigns to avoid potential adverse effects to those documented resources. DOWL recommended that no additional field survey is necessary if the recommendations are incorporated into the Project alignment. The NRHP listed sites identified in the literature reviews for those historic properties are provided in **Attachment D**, and in the **CRMP at Exhibit #2**, Summary of Design Changes to Mitigate Impacts (**Attachment E**).
- D. Doyon will retain qualified consultants to conduct archaeological surveys and testing along the route of the Canyon Bypass prior to initiation of ground disturbing activities during that phase of the Project. Fieldwork and reporting activities will be guided by the protocols and procedures outlined in the attached CRMP (**Attachment E**). If any cultural resources are discovered during the archaeological reconnaissance, the FOC alignment will be rerouted to avoid those properties. If re-routing the alignment is not feasible due to geotechnical or other considerations, a treatment plan for data recovery or other mitigation measures will be developed through consultation among the Signatories and Tribes as outlined in Section V. *Resolution of Adverse Effects* and the procedures outlined in the CRMP (**Attachment E**). Research performed pursuant to this PA will follow the guidelines and standards issued by the Alaska SHPO.
- E. If, after execution of this PA, Doyon refines the alignment of the FOC within the Fairbanks to Yukon River segment or in one or more of the five communities outside of the APE, Doyon will retain a qualified consultant to conduct a desktop review of the new alignment changes and consult with NTIA and SHPO to determine if a field survey is warranted and if the alignment changes may have an adverse effect on any known historic properties within the APE of the new alignments. Doyon, through its consultant, will develop plans to avoid or minimize impacts to any identified historic properties. Any such plans must be submitted to and approved by NTIA and SHPO prior to beginning construction work in the new alignment areas. Doyon will be required to submit a report from their consultant describing the findings of the cultural resources/historic properties identification efforts in the new alignment(s) and how Doyon will implement construction activities at the new alignment(s) based on the results of the additional literature review. NTIA and SHPO will review and provide concurrence with the Doyon work plans prior to

⁴ *The Study Area for the literature review was a 200-foot corridor, 100 feet on either side of the Project alignment. The DOWL literature review as well as a 2012 literature review of the route completed by Territorial Heritage Resource Consultants identified 12 sites located within 10 feet of the alignment as eligible, treated as eligible, listed as a contributing property to an eligible historic district, or not formally evaluated for eligibility within the APE of the Project alignment.*

NTIA authorization to Doyon to commence construction of new alignment(s). Copies of this correspondence and documentation outlining the changes to the APE will be documented and retained by Doyon.

- i. Any such additional cultural resources literature review report(s) developed by Doyon or DeployCom's consultant shall include the following information (as appropriate):
 - a. Detailed descriptions of the Project's proposed alignments within the community or other ROW, including descriptions of the installation methods and land ownership status;
 - b. Detailed descriptions of known cultural resources within the new alignment APE;
 - c. Summaries of previous cultural resources survey efforts and results within the community;
 - d. Locations for specific newly proposed components (e.g., beach manholes, vaults, horizontal directional drilling entry and exit points, new utility poles)
 - e. An evaluation and recommendations for avoiding or mitigating effects to any NRHP-listed or eligible cultural resources identified in the new alignment(s).
- ii. NTIA and SHPO review and approval of the literature review and plans and recommendations prepared by Doyon's consultant(s) shall occur on the following schedule:
 - a. Doyon shall submit the literature review and plans to NTIA and SHPO containing the items listed in Stipulation IV.E.i;
 - b. NTIA and SHPO shall have 30 days to review and comment on the plan;
 - c. Doyon's consultant(s) shall address any necessary comments or questions, and resubmit the revised plan to NTIA and SHPO within 15 days of receiving their comments;
 - d. NTIA and SHPO shall review the revised plan within 30 days and either:
 1. Provide their written approval that Doyon's consultant may implement the plan; or
 2. Provide detailed comments to identify any deficiencies in the plan that prevent its approval and which Doyon must resolve prior to approval.
 - e. Upon acceptance of the plan by NTIA and SHPO, Doyon's consultant may implement the plan, conduct the proposed fieldwork, and prepare any subsequent reporting efforts to NTIA and SHPO.
- iii. After completion of the fieldwork in accordance with the approved plan, Doyon's consultant shall prepare a report describing the implementation of the additional inventory plan, and submit this report to NTIA and SHPO for review and approval according to the following schedule:
 - a. Doyon's consultant shall submit a report describing the methods and results or findings of the implementation of the approved plan to Signatories and Tribes within 180 days of the fieldwork activities. The report shall contain:
 1. A summary of the fieldwork activities, duration, and findings.
 2. A list of cultural resource sites identified and/or investigated.
 3. Proposed avoidance strategies for known cultural resource sites for which avoidance is being proposed.

4. Descriptions of alignment revision recommendations or modifications to construction techniques to avoid or minimize adverse effects.
- b. Signatories and Tribes shall have 30 days to review and comment on the report.
- c. Doyon shall address any substantive comments or questions and resubmit the revised report to Signatories and Tribes within 15 days of receiving their comments.
- d. Signatories and Tribes shall review the revised report within 15 days and either:
 1. Provide their written confirmation that the report and proposed construction implementation plan adequately addresses potential adverse effects to historic properties and Doyon may commence construction activities as outlined within the report; or
 2. Provide detailed comments that identify deficiencies in the report and proposed implementation that prevent its approval and which Doyon must resolve prior to approval.
- e. Upon acceptance of the report and implementation plan by Signatories and Tribes, NTIA will notify Doyon in writing that they may implement the proposed construction and any subsequent reporting efforts to NTIA and SHPO, consistent with Stipulation V.B.i.

V. RESOLUTION OF ADVERSE EFFECTS

- A. To the extent practicable, Doyon and DeployCom will develop or modify Project design and construction methods to avoid historic properties. In the event that NTIA, in consultation with SHPO, determines that an adverse effect has or will occur and cannot be adequately minimized or avoided through other measures, Doyon and DeployCom's cultural resource consultant will develop a written treatment plan within 15 days of adverse effect notification by NTIA. Signatories and Tribes will be provided copies of the treatment plan and will have 15 days to conduct their review and provide comments. After the 15-day period NTIA will provide authorization to Doyon to proceed with the treatment plan.
 - i. Preferred mitigation measures include, but are not limited to:
 - a. Oral history interviews, place names studies, GIS mapping, development of media, archival searches, and report preparation and publication (generally associated with properties eligible under Criterion A or B);
 - b. Historic American Building Survey/Historic American Engineering Record/Historic American Landscape Survey documentation or rehabilitation and reporting (generally associated with properties eligible under Criterion C), and/or;
 - c. Data recovery and analysis, reporting, and curation of resulting collections and records (generally associated with properties eligible under Criterion D).
 - ii. To the extent practicable, the mitigation measures should relate to the community in which the adverse effect will occur.
- B. Doyon and DeployCom's consultant shall submit the treatment plan to NTIA and SHPO for a 15-day review and approval period.
 - i. NTIA and SHPO shall provide comments to Doyon and DeployCom's cultural

resources consultant and indicate if the treatment plan adequately resolves the adverse effect, or if additional information or modifications of the Treatment Plan are required.

- C. Upon approval of the treatment plan by NTIA and SHPO, NTIA will provide Doyon and DeployCom with written notice that the treatment plan may be implemented consistent with PA Stipulation VI.

VI. INITIATION OF CONSTRUCTION AND STOP WORK ORDERS

- A. Upon execution of this Agreement and its attachments, Doyon and DeployCom and their contractors may commence construction within the terrestrial phases of the Project, provided that Doyon and DeployCom and contractors hired on their behalf have obtained any and all necessary permits, authorizations, or agreements. If archaeological monitoring is required, monitors will be in place before construction commences. If detailed phased identification plans for one or more communities are required after the execution of this Agreement, consistent with Stipulation IV.E. above, these plans and their implementation must be approved by both NTIA and SHPO prior to Doyon and DeployCom commencing terrestrial construction activity.
- B. Doyon and DeployCom or their contractors or subcontractors shall not initiate work within the River Corridor APE of the Project until NTIA provides Doyon and DeployCom with written notice that pre-construction provisions of the Agreement and CRMP have been fulfilled for the Project.
- C. Archaeological monitoring may be required during construction and/or as a result of an inadvertent discovery. Requirements for monitoring are outlined in Section 5 of the CRMP.
- D. Archaeological monitors working at locations of ground-disturbing activity associated with the Project have the authority to issue stop-work orders to Doyon and DeployCom or contractors hired on their behalf to allow for inspection of suspected cultural resources and/or human remains, and to allow for any necessary notifications or consultations as required by the terms of this Agreement and attached CRMP.
- E. In the event that NTIA makes an adverse effect determination, and a treatment plan is developed in accordance with Stipulation V, *Resolution of Adverse Effects*, upon approval of the final treatment plan by NTIA and SHPO, NTIA will notify Doyon and DeployCom in writing that the treatment plan may be executed.

VII. COLLECTION AND CURATION

- A. Legal requirements for curation of cultural materials vary depending upon (1) land status where the materials are collected (federal, state, private, Tribal); (2) whether or not the materials are subject to the provisions of the Native American Graves Protection and Repatriation Act of 1990 (“NAGPRA”), as amended; (3) whether or not the materials include human remains, funerary objects, sacred objects, or objects of cultural patrimony; and, (4) whether or not any human remains are subject to investigation by the Alaska State Troopers or other law enforcement agency with jurisdiction.
- B. Any materials collected as a result of implementing this PA, and not subject to NAGPRA, are the property of the applicable state or federal land-

managing agency, or landowner if collected from privately owned property. On federal lands, any human remains, funerary objects, sacred objects, or objects of cultural patrimony, as defined in 43 CFR 10.2(d), will follow disposition to lineal descendants or Tribe(s), following the procedures set forth in 43 CFR 728 10, Subpart B.

- C. Pursuant to 36 CFR 79.7(b) and applicable federal permit(s), the permittee will assume all costs associated with the curation of any materials that are collected during the implementation of this PA, in perpetuity. Curation costs may include, but are not limited to, curation fees charged by approved institutions, acquisition of archival materials, shipping, cleaning, rehousing, and any other conservation action determined necessary by a qualified conservator or considered common/ethical practice by the industry.
- D. Federal land managing agencies shall ensure that curation of materials collected from federal lands, and not subject to the provisions of the NAGPRA, is completed in accordance with 36 CFR 79, Curation of Federally Owned and Administered Archaeological Collections. The Permittee will submit all materials from federal lands for curation at the UAMN in Fairbanks, Alaska, but the materials will remain in federal ownership. During the permitting process, the Permittee will establish a provisional curation agreement with the UAMN for collections, which the Permittee will finalize prior to submission of collections to the UAMN.
- E. Collections from state lands will comply with AS 41.35.020. The Permittee will submit all materials from state lands for curation at the UAMN, but the materials will remain in state ownership. During the State of Alaska's Cultural Resource Investigation Permitting process, the Permittee will establish a provisional curation agreement with the UAMN for collections, which the Permittee will finalize prior to submission of collections to the UAMN.
- F. The Permittee, and any contractors hired on their behalf, will be responsible for submitting all materials recovered from state and/or federal lands to the UAMN within 1 year following completion of the fieldwork that generated the collection if the property will not require mitigation. All collections will be curation-ready, as determined by UAMN requirements. Prior to disposition, the Permittee, or any contractors hired on their behalf, will safeguard all materials from theft or damage by providing appropriate interim storage facilities and conservation actions, consistent with the requirements in 36 CFR 79.9. The Permittee shall consult with UAMN staff regarding interim storage facilities and necessary conservation actions to be consistent with 36 CFR 79.9 (b)(4). Within 30 days following disposition, the Permittee will provide the land managing agency with all accession records and documentation associated with the transfer and curation of materials. The land managing agency will share the documentation with other landowners or managers, as appropriate.
- G. For collections recovered from private lands, the Permittee will work with private landowners to arrange for the disposition of materials. The Permittee will provide private landowners with information on the value of curation and will assume all costs of the materials, not to exceed standards set forth in 36 CFR 79. If a landowner chooses to donate or loan the

materials to the UAMN or another repository, the Permittee will provide the NTIA with documentation of the transfer within 30 days following the transfer. In the event that a landowner chooses to retain a collection, the Permittee will provide documentation of this to the NTIA.

VIII. POST-REVIEW DISCOVERIES

- A. Items subject to NAGPRA will be handled in accordance with the implementing regulations found at 43 CFR Part 10, and consistent with the Human Remains Inadvertent Discovery Plan (CRMP section 6.4). NAGPRA items include Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. The CRMP includes a list of Alaska Native Organizations and Tribal Governments that will be contacted in the event of a discovery of human remains (**CRMP at Exhibit #3**).
 - i. Doyon shall ensure that if Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony are discovered during implementation of the Undertaking, all work within 100 feet of the discovery will cease, the area will be secured, and the NTIA, SHPO, and land managing agency's authorized official, where appropriate will be immediately contacted. Doyon will also comply with applicable state and local laws regarding the discovery of human remains as discussed in Section 6.4 of the CRMP.
- B. If previously unidentified historic properties or unanticipated effects, including audible, visual, atmospheric, and cumulative effects, to historic properties are discovered during project implementation, the contractor shall immediately halt all activity within a 100-foot radius of the discovery and implement interim measures to protect the discovery from looting and vandalism. Within 48 hours, Doyon shall notify NTIA, the SHPO, and the ACHP and the landowner of the inadvertent discovery, and determine whether an Inadvertent Discovery Plan is necessary, and whether 100 feet is sufficient for protection measures.
- C. The Inadvertent Discovery Plan for non NAGPRA items includes the following provisions:
 - i. Immediately halting all construction work involving subsurface disturbance in the area of the find and in the surrounding area where further subsurface finds can be reasonably expected to occur, and immediately notifying NTIA, SHPO, and the land manager of the find.
 - ii. A qualified professional, meeting the requirements in Section I, will immediately inspect the site and determine the area and nature of the affected find. Construction work may then continue in the area outside the find as defined by NTIA in consultation with the SHPO.
 - iii. Within five working days of the original notification, NTIA, in consultation with SHPO, land manager, and others' parties as appropriate, will determine whether the find is eligible for the NRHP;
 - iv. If the find is determined eligible for listing in the NRHP, Doyon will prepare a plan for its resolution of adverse effects in consultation with NTIA, the SHPO, land manager, and others' parties as appropriate. Any dispute concerning the proposed treatment plan will be resolved by NTIA.

The ACHP is available to provide technical assistance in developing the plan.

- v. Work in the affected area will not proceed until either: 1) The plan is implemented, and on-the-ground treatment measures are completed; or 2) The determination is made that the unanticipated find is not eligible for inclusion in the NRHP. Any disputes over the evaluation of unanticipated finds will be resolved in accordance with the requirements of 36 CFR 800.4(c)(2) as appropriate.
- D. Doyon may resume construction activities in the area of the discovery when the NTIA has determined that implementation of the actions undertaken to address the discovery pursuant to this Stipulation are complete.

IX. DISPUTE RESOLUTION

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

X. ANNUAL REPORT AND MEETING

- A. On or before January 31 of each year, or until the NTIA and the SHPO determine that the terms of this Agreement have been fulfilled and notify other Signatories, Doyon shall prepare and provide an annual report to all parties to this Agreement, addressing:
 - i. Status of Project and PA Implementation
 - ii. Progress in construction work
 - iii. Progress in cultural resource identification and evaluation, as applicable
 - iv. Coordination of work with planning and construction schedules
 - v. Any problems or unexpected issues related to this Agreement encountered during the year
 - vi. Any changes that the NTIA, or other parties to the Agreement, believe should be made in implementation of this Agreement.
- B. No later than March 31 each year, NTIA shall convene a meeting of the

Signatories to discuss the previous year's activities, and activities scheduled for the coming year. The meeting may be held virtually, or in Anchorage at the Alaska Office of History and Archaeology, or at another location by consensus of the Signatories. The parties may participate by virtual means if they desire. Attendance in person at the location of the meeting shall be at the expense of the parties. Minutes of the meetings will be distributed by NTIA within 30 days. The NTIA shall amend the minutes as a result of comments received within 15 days and distribute finalized minutes within 15 days.

- C. At the annual meeting NTIA, SHPO, Doyon, and DeployCom will review all sections of this PA to update outdated statutes, best practices, and contact information, and to consider whether organizations who may have originally declined participation may wish to participate. Amendments to the PA would be consistent with Stipulation XI: *Amendments*.

XI. AMENDMENTS

- A. Any Signatory to this Agreement may propose to the NTIA that this Agreement be amended, whereupon the NTIA shall consult with the other Signatory parties to seek agreement on such an amendment within 30 days. Any amendment to this Agreement shall become effective upon the signature of all the Signatory Parties and will be filed with the ACHP.
- i. NTIA may update **Attachment A** Project Location Maps or the online web mapper at any time without a PA amendment. NTIA will notify the Signatories of any updates and provide the revised version of **Attachment A** at the Annual Meeting.
 - ii. The CRMP, **Attachment E** may be updated without a PA amendment upon written approval from the SHPO and NTIA and notification of the Signatories of the revision by providing them with a copy of the revised CRMP. Any PA Signatory may propose an amendment to the CRMP by submitting a request in writing to NTIA with the proposed CRMP language changes. If NTIA concurs that the amendment improves or updates the CRMP, NTIA will share the proposed amendment with the Signatories for a 30-day review and comment period. NTIA will consider all timely comments received, in consultation with the SHPO, and incorporate changes. NTIA will send a revised version of the CRMP to Signatories following written approval. If any Signatories object to the changes, NTIA will follow the steps in Stipulation IX, *Dispute Resolution*.
 - iii. NTIA may update the CRMP Exhibit 3, Contact List at any time without necessitating written approval from the SHPO. NTIA will provide any revisions to these exhibits at the Annual Meeting.
 - iv. NTIA may append documents to this Agreement, at any time without a PA amendment, as long as the documents are required by and/or developed under the terms of the PA, such as Inadvertent Discovery Plans, treatment plans, or other plans, and the addition is documented in **Attachment H**, Amendment and Addendum Log. Final Reports do not need to be appended to the PA.
- B. NTIA will document all amendments and addendums to the PA in **Attachment H**, Amendments and Addendum Log. NTIA will provide revised versions of the PA or PA Attachments to all Signatories to the Agreement within 30 days of finalization, unless otherwise noted.

- C. Attachments to this Agreement (e.g., CRMP) may be amended through a streamlined process by submitting a request in writing to NTIA. If NTIA agrees that the attachment should be updated, it will distribute the proposal to the Signatories with a request to provide comments within 30 days. NTIA will consider all timely comments received and determine whether to accept the updated attachment. If no comments are received at the end of the review period, NTIA will distribute an updated version of the Agreement to the Signatories.
- D. In the event that another federal agency, not initially a party to this Agreement, receives an application to fund, license, or permit an Undertaking related but not identical to the Project described in the Agreement and notifies the Signatories of its interest in and willingness to follow the terms of this Agreement, the Parties may elect to amend the Agreement to add the related scope to the Project and allow the agency to join the Agreement upon the execution of a Signature Page and filing with the ACHP. NTIA may delegate distribution responsibilities of reports, notices, or other activities outlined in this Agreement to that agency in such an Amendment.

XII. TERMINATION

- A. If Doyon or DeployCom determine that they cannot implement the terms of this Agreement, or if NTIA or the SHPO determines that the Agreement is not being properly implemented, Doyon, DeployCom, NTIA or the SHPO may propose to the other parties to this Agreement that it be amended or terminated. If amendment is proposed, NTIA will consult with the other Signatories to attempt to develop an amendment per Stipulation XI, above.
- B. This Agreement may be terminated by any Signatory in accordance with the procedures described in 36 CFR Part 800.6(c)(8) after consultation to seek amendment. Upon termination, Doyon shall submit a technical report detailing any cultural resource work done in furtherance of this agreement up to and including the date of termination.

XIII. DURATION OF AGREEMENT

- A. This Agreement shall continue in full force and effect until seven (7) years after the date of execution. At any time in the six-month period prior to such date, Signatories may request an amendment to extend or modify this Agreement. No extension or modification shall be effective unless NTIA and the SHPO have agreed with it in writing.
- B. Upon the completion of all stipulations to this Agreement, Doyon shall circulate to NTIA, the SHPO, and the other Signatories to this Agreement a signed memorandum documenting that Doyon has fulfilled all its responsibilities under this Agreement.

XIV. ANTI-DEFICIENCY ACT

NTIA's obligations under this Agreement are subject to the availability of appropriated funds, and the stipulations of this Agreement are subject to the provisions of the Anti-Deficiency Act. NTIA will make reasonable and good faith efforts to secure the necessary funds to implement this Agreement in its entirety. If compliance with the Anti-Deficiency Act alters or impairs NTIA's ability to implement the stipulations of this Agreement, NTIA shall consult in accordance with the amendment and termination procedures found at Stipulations XI and XII above.

Execution of this Programmatic Agreement by NTIA and SHPO, its submission to the ACHP in accordance with 36 CFR Part 800.6(b)(1)(iv), and implementation of its terms, evidence that NTIA has taken into account the effect of this Undertaking on historic properties and has afforded the ACHP an opportunity to comment.

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

SIGNATORY 1 of 5

AGENCY NAME: U.S. Department of Commerce, National Telecommunications and Information Administration

By: **Douglas
Kinkoph**

Digitally signed by
Douglas Kinkoph
Date: 2024.07.10
07:51:23 -04'00'

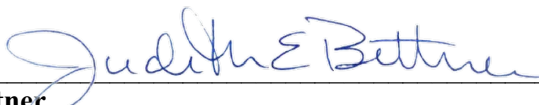
DATE: _____

**Douglas Kinkoph
Associate Administrator
Office of Internet Connectivity and Growth**

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

SIGNATORY 2 of 5

ENTITY NAME: Alaska State Historic Preservation Office


By: 
Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology

DATE: 7/23/2024

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

SIGNATORY 3 of 5

ENTITY NAME: Doyon, Limited

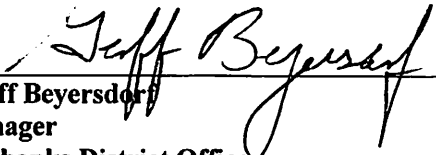
By: 
Allen Todd
General Counsel
Doyon, Limited

DATE: 7/18/2024

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

SIGNATORY 4 of 5

ENTITY NAME: Department of Interior, Bureau of Land Management

By: 

**Geoff Beyersdorf
Manager
Fairbanks District Office**

DATE: 07/15/24

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

SIGNATORY 5 of 5

ENTITY NAME: U.S. Army Corps of Engineers

By: Janet Post
Janet Post
North Branch Chief
U.S. Army Corps of Engineers

DATE: 7/18/2024

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

INVITED SIGNATORY 1 of 1

ENTITY NAME: DeployCom

By: *Douglas R Hudson*
Doug Hudson
Project Manager
DeployCom

DATE: July 16, 2024

**PROGRAMMATIC AGREEMENT
BY AND AMONG THE
NATIONAL TELECOMMUNICATION AND INFORMATION ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION OFFICE,
DOYON, LIMITED, THE U.S. ARMY CORPS OF ENGINEERS, AND THE BUREAU OF
LAND MANAGEMENT
REGARDING THE
ALASKA FIBEROPTIC PROJECT**

CONCURRING PARTIES 1 of 1

ENTITY: Beaver Village Council

By:  _____

DATE: 07/23/29

**NAME: Rhonda Pitka
TITLE: Chief
DEPARTMENT: Beaver Village Council**

**ATTACHMENT A
PROJECT LOCATION MAP**



- | | |
|--------------------------------|-------------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | ~ Scratch Plow |
| ▬ Parks, Preserves and Refuges | ~ Canyon Bypass (Terrestrial) |
| ▬ Highway | ~ Jet Plow |
| | ~ Terrestrial |



DEPLOYCOM, LLC

ALASKA FIBEROPTIC PROJECT PROJECT LOCATION MAP

ALASKA FIBEROPTIC PROJECT

SCALE: 0 5 10 20 Miles
 0 10 20 40 Kilometers

FIGURE: 1

DEPLOYCOM_0112.aprx, 2/8/2024 2:30 PM, R00

ATTACHMENT B
DEFINITION OF AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) for the terrestrial alignment along the Steese, Elliott, and Dalton highway corridors and within each of the five communities is 30 feet either side of the FOC centerline, 60 feet total in width. At river crossings in the Canyon Bypass, the APE is 100 feet wide at the streambank edge, narrowing to 60 feet wide, 100 feet upland of the streambank.

The APE for the riverine portion of the Project is 100 feet either side of the planned cable lay in the bed of the Yukon River, a 200-foot total width.

The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the Project an online web mapper has been developed to display the APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](#).

The Study Area for the Yukon River Corridor and overland Canyon Bypass Corridor was 1.5 miles either side of the FOC installation centerline in the Yukon River and on the Canyon Bypass Corridor. Within the five communities, the terrestrial installation Study Area included the entire community.

The Study Area for the Fairbanks to E.L. Patton Bridge over the Yukon River along the Steese, Elliott and Dalton highways was a 200-foot corridor along the route of the FOC line.

**ATTACHMENT C
PROJECT DESCRIPTION**

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (**Attachment A**).

The Project is divided into two corridors: a Terrestrial Corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a River Corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The River Corridor includes all activities within the river as well as an overland Canyon Bypass Corridor that avoids the Rampart Rapids.

The Project will be completed in two phases during 2024 and 2025. The majority of the FOC will be installed in 2024 and includes the majority of the Terrestrial Corridor, River Corridor between Beaver and Tanana, and the Canyon Bypass Corridor. The FOC between Fort Yukon and Beaver, and remainder of the Terrestrial Corridor between Fairbanks and the Yukon River Bridge will be completed during the summer of 2025.

The terrestrial portion of the Project starts in Fairbanks and continues north crossing over the Yukon River, terminating on the north side of the E.L Patton Bridge (132 miles). Installation of the FOC uses a variety of methods all located primarily within the existing highway right-of-way managed by the Alaska Department of Transportation and Public Facilities. The FOC will be strung on an existing pole line for the first 20 miles and will then transition below ground where clearing, vibratory plowing, and trenching will be used to directly bury the cable below the surface. Horizontal directional drilling (HDD) will be used, as necessary, at creek and roadway crossings.

Vibratory plowing is the primary installation method for FOC and uses a tracked plow which creates an opening in the ground surface approximately 3 inches wide and "plows" the FOC or conduit into the subsurface at various depths. Surface disturbance from plowing is limited to a width of approximately 6 inches. Vegetation clearing of an approximately 10 to 15 feet-wide area is required to allow for equipment access in support of the FOC installation.

Where necessary, trenching will occur using a standard utility backhoe that excavates a trench approximately 16 inches wide and 3 feet deep. The conduit or duct is placed at the bottom of the trench, and the FOC is pulled through or blown into the conduit. The soil is replaced and compacted into the trench.

The riverine portion of the Project starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (316 miles). All in-water work will be completed from a self-propelled, self-contained cable-lay barge supported by smaller support skiffs. The cable lay barge is a specially designed and constructed, self-propelled barge that carries the FOC, a dynamic positioning (DP) system to maintain a steady position and movement within the Yukon River current, and a liner cable engine (LCE) that controls the FOC angle, tension, setback, and payout all controlled by the barge Cable Superintendent. A jet plow or scratch plow will be deployed from the CLB, towed along the river bottom, and used to insert the FOC into the riverbed. The CLB infrastructure includes fuel storage, workshops, FOC splice shop, galley, pantry, bunkhouse, offices, and potable water and treatment systems.

Both jet and scratch plows are underwater plows that pump high pressure water from surface fed pumps on board a shallow draft cable lay support barge. The high-pressure water temporarily fluidizes the riverbed, allowing the plowshare to bury the FOC into the riverbed. Once the plowshare has passed, the riverbed rapidly fills in the fluidized trench, burying the FOC. A scratch plow will be used between Beaver and Tanana to bury the cable 1 foot deep into the riverbed. A jet plow will be used in the shallower waters between Fort Yukon and Beaver to bury the cable 3 feet deep within the riverbed.

Within each community the FOC will be brought to shore via HDD. A beach manhole (BMH) and a communications shelter will be permanently placed within each community. A precast concrete cellar will house the fiber optic cable as it transitions out of the Yukon River to a terrestrial installation. Wherever possible, BMHs are located on previously disturbed ground. The BMH and the communications shelter will be placed within the designated location. Existing utility easements will be used wherever feasible. Once the FOC leaves the communications shelter it will be strung on existing poles aboveground with minimal ground disturbance anticipated. In some communities, co-locating the BMH and communications shelter may not be feasible and the FOC may be strung on existing poles between the BMH and the communications shelter.

The approximate 20-mile Canyon Bypass between the communities of Rampart and Tanana is designed to bypass the Rampart Rapids in the Yukon River. Conventional vibratory plowing will primarily be used to install the FOC in the Canyon Bypass Corridor (19 miles) and will directly bury the FOC into the ground (subsurface), 6-12 inches deep.

To reduce impacts to wetlands located at the upstream end of the Canyon Bypass, the FOC will be laid on the ground surface for approximately 1 mile. The surface installation of the FOC will be completed using a helicopter to string a line across the wetlands area to minimize impacts to the ground surface. The FOC will then be attached to the line and both will be winched across the wetland to the BMH located near the Yukon River. The cable will be diverted into the BMH, via a 1.25-inch conduit that will extend approximately 20–30 feet out of the BMH. Over time the cable will settle into the ground surface.

HDD will be used to cross under any streams along the alignment. A BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River.

ATTACHMENT D
LIST OF NATIONAL REGISTER OF HISTORIC PLACES SITES IN THE PROJECT
AREA OF POTENTIAL EFFECT

AHRS NO.	NAME	SITE TYPE	ELEMENTS	OTHER AHRS NO. NRHP STATUS	LAND STATUS
LIV-00122	Tanana Valley Railroad	Structure	Abandoned railbed, rail ties	FAI-00230, FAI-00209 DOE-S	State of Alaska
FAI-00344/ LIV-00073	Davidson Ditch	Structure	Manmade earthen structure, wood flumes, penstocks, etc.	LIV-73, CIR-010 DOE-K (A,C,D)	State of Alaska
LIV-00764	Elliott Highway, Segment B, Bypass 1	Structure, transportation, highway	Gravel roadbed, one travel lane, embankment	DOE-S (A)	State of Alaska
LIV-00769	Elliott Highway, Segment B, Bypass Segment B16	Structure, transportation, highway	Gravel roadbed, one travel lane, embankment	DOE-S (A)	State of Alaska
LIV-00503	Livengood Mining Historic District	District	Numerous contributing elements	DOE-S (A,D)	State of Alaska/ BLM
LIV-00515	Olive to Cleary Creek Ditch	Site, ditch, industry	Not individually eligible, but eligible as a contributing element to LIV-00503 HD	(DREJ-S) Contributing property within an eligible district (DXS)	State of Alaska
LIV-00392	Livengood Tram Road (ARC Route 63C-Brooks Tram)	Site, historic road	Linear resource, unclear from AHRS information if physical remains are present	AGDC determined this site is not eligible for the NRHP. SHPO recommends further identification efforts (October 2019). Pending consultation between SHPO and agency (DOE-P-S)	BLM
LIV-00556	Dunbar-Brooks Terminal Trail	Site, trail	No physical evidence of this site at the Project location	(DOE-S) (A) See also FAI-02102	BLM

AHRS NO.	NAME	SITE TYPE	ELEMENTS	OTHER AHRS NO. NRHP STATUS	LAND STATUS
LIV-00284	Rosebud Knob Archaeological District	Prehistoric archaeological district comprised of 17 sites within the historic district	Prehistoric sites exist within the HD	(DOE-S) (D) Closed for other reason - needs re-evaluation (NRXCL)	State of Alaska
LIV-00501	Dalton Highway	Site, transportation, highway	Character defining elements of the Dalton Highway will not be adversely affected by the Project	(DOE-S) (A,G)	State of Alaska
LIV-00455	E.L. Patton Bridge	Structure, bridge	Bridge built in 1975- continuous orthotropic beam, twin box girder bridge measuring 2,295 ft x 31 ft wide. The bridge was designed to span the 2,000 ft wide river with 5 instream piers spaced at 410 ft intervals and two 310 ft approach spans. Piers are reinforced concrete on lower portion, varying from 50 ft to 86 ft, with steel frames above.	(DOE-S) (A,G)	State of Alaska
TAN-00008	Rampart Historic District		Historic district has not been surveyed and contributing elements recorded	(DOE-S) (A,D)	Private
TAN-00056	Tanana Federal Aviation		No physical remains	(DOE-S) (C)	Native Lands

AHRS NO.	NAME	SITE TYPE	ELEMENTS	OTHER AHRS NO. NRHP STATUS	LAND STATUS
	Administration Station Facility District			Demolished and removed	
TAN-00106	Tanana Indian Health Service Hospital complex Historic District	Structures	No physical remains	DOE-S (A) Demolished or removed	Native Lands
KEY:	DREJ-S	Determined not eligible by SHPO and agency			
	DOE-S	Determined eligible by SHPO and agency			
	DOE-K	Determined eligible by the Keeper of the National Register			
	DXS	Contributing property within an eligible district			
	DOE-P-S	Pending consultation between SHPO and agency			
	NCP	Non-contributing property within an eligible district			
	ND	No data in AHRS record			
	No DOE	No determination of eligibility			
	NRHP	Listed on the National Register of Historic Places			
	DEST	Site destroyed			
	(A) (B) (C) (D)	National Register of Historic Places eligibility criteria			

ATTACHMENT E
CULTURAL RESOURCES MANAGEMENT PLAN

NOTE TO READERS: THIS CULTURAL RESOURCES MANAGEMENT PLAN IS EXHIBIT E OF THE DOCUMENT TITLED: PROGRAMMATIC AGREEMENT BY AND AMONG THE NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION, THE ALASKA STATE HISTORIC PRESERVATION OFFICE, AND DOYON, LIMITED, DEPLOYCOM, INC. REGARDING THE ALASKA FIBEROPTIC PROJECT

Cultural Resources Management Plan

Alaska FiberOptic Project

July 2024

Version: 1.0

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ACRONYMS AND ABBREVIATIONS

ACRC	Alaska Cultural Resources Consultants, LLC
ACS	Alaska Communications Systems
AHRS	Alaska Heritage Resources Survey
APE	Area of Potential Effect
AS	Alaska Statute
BLM	U.S. Bureau of Land Management
BMH	Beach manhole
CFR	Code of Federal Regulations
CLB	cable lay barge
CRMP	Cultural Resource Management Plan
DNR	Alaska Department of Natural Resources
DOT&PF	Alaska Department of Transportation and Public Facilities
DP	differential positioning system
FNSB	Fairbanks North Star Borough
FOC	fiber optic cable
HABS	Historic American Building Survey
LCE	linear cable engine
MLW	Alaska Division of Mining, Land, and Water
MP	Milepost
NHPA	National Historic Preservation Act
NHTI	New Horizons Telecom, Inc.
NOTMAR	Notice to Mariners
NPS	National Park Service
NRHP	National Register of Historic Places
NTIA	National Telecommunications and Information Administration
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
Project	Alaska FiberOptic Project
ROW	right-of-way
SHPO	State Historic Preservation Office(r)
SRA	State Recreation Area
TBCP	Tribal Broadband Connectivity Program
THRC	Territorial Heritage Resources Consultants
USACE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service

1 INTRODUCTION AND PURPOSE

The U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA), the Alaska State Historic Preservation Officer (SHPO), Doyon, Limited (Doyon) and DeployCom have prepared this Cultural Resources Management Plan (CRMP) as part of a Programmatic Agreement under Section 106 of the National Historic Preservation Act (NHPA). The purpose of the CRMP is to avoid or minimize potential adverse effects to cultural resources and historic properties that may result from ground-disturbing construction activities associated with the Alaska FiberOptic Project (Project). This CRMP outlines the processes and protocols by which the Project will avoid and/or minimize the potential for adverse impacts to cultural resources and historic properties during Project construction by implementing Cultural Resource Awareness and Responsibilities Training and establishing inadvertent discovery protocols in the event that archaeological, historic, or human remains are encountered during Project activities.

The CRMP establishes procedures applicable to the Project to be used in the event that previously unreported and unanticipated cultural resources or potential human remains are found during Project construction. The procedures differ depending upon whether unanticipated non-human cultural materials or potential human remains are encountered, as well as whether the unanticipated cultural materials are found on federal, state, or private lands.

2 PROJECT DESCRIPTION

2.1 Location

Doyon, an Alaska Native Regional Corporation, proposes to construct and operate the Project. The Project will utilize funding provided by a NTIA grant from the Tribal Broadband Connectivity Program (TBCP) to provide broadband access to five currently underserved communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to an area of the Yukon River in the central interior region of Alaska (Exhibit 1). A map of the Project may be accessed at:

<https://ornrc.maps.arcgis.com/apps/webappviewer/index.html?id=789273d33e1b46678fbbd118ebb381d1>.

The Project is divided into two corridors: a Terrestrial Corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a River Corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (Exhibit 1).

The River Corridor includes all proposed activities within the river as well as a 20-mile overland Canyon Bypass Corridor that avoids the Rampart Rapids. Doyon has contracted with DeployCom and various other subcontractors to complete the environmental review and permitting in both the River and Terrestrial corridors, in compliance with the National Environmental Policy Act.

2.2 Methods of Construction

The terrestrial installation of the FOC will occur primarily in the Alaska Department of Transportation and Public Facilities (DOT&PF) right-of-way (ROW) between Fairbanks and the Yukon River Bridge and will consist of several different methods appropriate to the terrain and environmental and cultural features. The FOC will be installed in a 1.25-inch diameter high density polyethylene (HDPE) conduit to protect the line. Above-ground installation of the FOC on existing utility poles will be used for the first 20 miles north of Fairbanks. New utility poles are required at three isolated locations along the Elliot Highway near MP 52.0 where terrain reduces the feasibility of traditional plow/trench installation

methods. Beyond the utility poles, approximately 112 miles of buried cable, primarily in the DOT&PF ROW along the Steese, Elliott, and Dalton highways will bring the FOC to the E.L Patton Bridge across the Yukon River. Horizontal directional drilling (HDD) will be used at various points to cross under streams and the highway. Vaults are planned for locations where fiber reels require splicing, approximately every 2,000 feet along the terrestrial component. A FOC regeneration site will be placed at a mid-point along the terrestrial FOC route (in the vicinity of Livengood) to boost the signal; the specific location has yet to be determined.

The River Corridor starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The River Corridor includes all proposed activities within the river, adjacent communities, and the overland Canyon Bypass Corridor that avoids the Rampart Rapids. The river component of the Project includes a total of 316 miles of FOC buried in the active channel of the Yukon River. At each community HDD will be employed to install conduit originating at a beach manhole (BMH) on shore and terminating at the FOC in the Yukon River. HDD will occur at designated locations and on previously disturbed ground wherever feasible. Depending on the community, one or two conduits 3–4 inches in diameter will convey the FOC between an onshore BMH and the Yukon River. In each community, a communications shelter, approximately 10 feet by 10 feet will be placed at a designated location. The FOC will be hung on existing utility poles above ground with minimal ground disturbance anticipated.

An approximate 20-mile Canyon Bypass Corridor is proposed between the communities of Rampart and Tanana. This bypass is required to avoid high velocity river flow (~10 knots) and unsuitable river substrate in which to lay FOC. One BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River. HDD will be used to install the FOC under any streams along the Canyon Bypass route.

The equipment proposed for land-based installation activities (Fairbanks to the Yukon River Bridge, Canyon Bypass, and in each community) is typical for a FOC Project and may include:

- Rubber wheeled backhoe
- Tracked excavator or backhoe
- Small tracked excavator
- Hoe pack
- Utility truck and spool trailer to deliver materials
- Hand tools (shovels, rakes, pry bars, compactors)
- Survey equipment
- Chain trencher
- Low pressure mulcher
- Feller/buncher
- Vibratory terrestrial plow
- HDD rig and support equipment
- Splicing equipment, small generator, and tent

Installation and burial of the FOC in the bed of the Yukon River uses specially designed equipment deployed from a cable lay barge (CLB), including:

- Deep draft CLB for 2024 installation (for use in deeper, faster moving waters)
- Shallow draft CLB for 2025 installation (for use in shallow, slower moving waters)
- Scratch plow (for use in deeper, faster moving waters)
- Jet plow (for use in shallow, slower moving waters)
- Support skiffs
- Landing craft
- Small utility boat to run pull line to beach
- Dive boat with hand jetting tools

Installation of the FOC in the Yukon River is uniquely engineered for the conditions based on riverine FOC installation experience in other parts of the world, existing track logs, known riverbed profiles, riverbed composition, depth, and cable specifications.

The command center for the river installation is situated on the self-propelled, self-contained CLB, supported by smaller support skiffs. The CLB houses FOC spools, a linear cable engine (LCE) that delivers cable to the river bottom, a splice shack to connect FOC spool ends, tool room, fuel tanks, a command bridge, generators, and support areas for the crew-galley, bunkhouses, office space, pantry, and washroom/showers. The CLB movement is controlled by a dynamic positioning (DP) system that maintains a consistent position and speed allowing for appropriate FOC tension and burial.

The Yukon River flows with a high level of turbidity and suspended solids. This flow condition combined with the bottom composition and vibration placed on the FOC from the current and cable tension from the LCE as it touches down on the riverbed, will cause the cable to self-bury in typical river sediments and gravels between Beaver and Tanana. From Fort Yukon to Beaver, the shallower Yukon River requires use of a jet plow mounted on a smaller barge. The jet plow utilizes surface fed water pumps to pump high pressure water to the leading edge of the jet plow which temporarily fluidizes the riverbed to allow the plow share to pass with relative ease and low tensions through the riverbed to a maximum depth of 3 feet.

River installation of the FOC will occur in two phases during the summers of 2024 and 2025. In 2024 the installation will begin in Beaver and work downstream to the Project termination in Tanana. In 2025 the process will begin in Fort Yukon and work downstream to the 2024 termination point in Beaver. All work completed in 2024 will be performed using a scratch plow which will bury the FOC approximately 1 foot into the riverbed. All 2025 work will be done from a smaller, shallow draft barge using a jet plow which will bury the FOC to a maximum of 3 feet into the riverbed.

Equipment used for the terrestrial component of the River Corridor at the Canyon Bypass is similar to the equipment used along the Terrestrial Corridor and within each community.

Area of Potential Effect (APE)

The area of potential effects is the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking (36 CFR 800.16(d)). The APEs of the Terrestrial and River corridors are presented in the table below.

Table 1. Area of Potential Effect Distances by Location

APE Type/Location	Linear Distance	APE Dimensions
Terrestrial Corridor		
Fairbanks to Yukon River (buried)	112 miles	30 feet either side of FOC centerline (60 feet total width)
Fairbanks to Chatanika SRA (above ground/aerial)	20 miles	30 feet either side of FOC centerline (60 feet total width)
River Corridor		
Yukon River FOC (in-river)	316 miles	100 feet either side of buried FOC centerline
Canyon Bypass (buried)	20 miles	30 feet either side of centerline, except 50 feet either side at stream crossings to 100 feet above streambank

Terrestrial Construction Zone Area of Potential Effect

The terrestrial construction zone APE includes the Terrestrial Corridor, Canyon Bypass, and all work areas in each community. The APE is centered on the FOC installation alignment centerline with a 30-foot buffer either side of the alignment, 60 feet wide total. At stream crossings in the Canyon Bypass, the APE is 100 feet wide at the streambank edge, 50 feet each side of the centerline, narrowing to 60 feet, 30 feet each side of the centerline, 100 feet beyond the stream bank.

The terrestrial APE includes the excavation footprint of the BMH above the high-water line and installation for the communication shelters. The BMH communication shelter footprint is approximately 25 feet by 25 feet and will be installed on previously disturbed ground wherever possible.

Riverine Construction Zone Area of Potential Effect

The riverine construction zone APE for FOC installation in the Yukon River is centered on the FOC burial in the bed of the Yukon River, with a 100-foot buffer either side of the centerline, 200-foot-wide total.

Within all APE’s, no indirect effects to historic properties nearby, if they exist, are anticipated as a result of the installation of communication shelters. Any auditory, olfactory, and/or atmospheric effects will be limited in scale, and temporary in duration. Furthermore, visual effects are not anticipated as the communications shelters will be constructed wherever possible at existing telecommunications facilities which already contain other communications structures and equipment, such as towers, shelters, dishes, and fencing.

3 POTENTIAL PROJECT EFFECTS

Final design of both the terrestrial and riverine alignments and components (e.g., BMHs, communications shelters) has not yet been completed. However, potential effects to historic properties resulting from Project activities can be considered with the intention of proposing strategies to avoid or minimize any potential effects that may arise as the Project moves forward with design and construction. Potential Project effects resulting from the terrestrial component of the Project include damage to surface and subsurface archaeological and historic resources, buildings, structures, or roadways or trails as a result of the ground-disturbing activities associated with the installation of the FOC in the Fairbanks to the Yukon River bridge alignment. Recommendations in the DOWL (2023) cultural resources inventory report for minor design changes will avoid any adverse effects to historic properties along the Terrestrial Corridor. Potential effects to presently unidentified cultural resources (if any are located) in the 20-mile Canyon Bypass will be avoided by minor re-alignments to avoid the site(s).

Potential Project effects resulting from the riverine component of the Project include disruption of or damage to submerged cultural resources (shipwrecks) during installation of the FOC in the Yukon riverbed using the scratch or jet plow. This potential to impact submerged cultural resources is very low for the following reasons: (i) the cultural resource inventory for the riverine component did not identify any known submerged cultural resources that could be pinpointed as to their location in the Yukon River (Alaska Cultural Resources Consultants 2023), and (ii) the CLB will use multi-beam sonar (MBS) to survey the riverbed prior to FOC installation. Any anomalies identified in the MBS survey will be avoided by shifting the FOC installation away from those anomalies, whether the anomalies are natural features such as boulders or buried logs, or are cultural features, such as shipwreck remains (metal boilers, iron frames) or other cultural objects such as 55-gallon drums, outboard motors, and similar items of dubious NRHP-eligibility.

There are no anticipated visual effects associated with the Project. The ground disturbance associated with the installation of a subsurface utility is temporary in duration, and the ground surface will be returned to its original condition and grade. Communication shelters built adjacent to existing facilities will not introduce any new intrusive visual elements due to their small size and proximity to existing development. Exhibit 2, List of NRHP Sites and Summary of Design Changes to Mitigate Impacts presents a list of NHRP sites identified in literature review and a summary of the design changes made to mitigate impacts. This same list is located in the PA (Attachment D).

4 PROJECT INVENTORY EFFORTS

4.1 Cultural Resources Literature Reviews

4.1.1 Terrestrial Cultural Resources

DOWL, under contract to NHTI, conducted a literature review of the Terrestrial Corridor (DOWL 2023). An earlier study by THRC (2012) reviewed cultural resources along the Elliott and Dalton highways for a potential Fox-Yukon River fiber optic project. ACRC reviewed the River Corridor communities, including the Canyon Bypass (ACRC 2023) for terrestrial cultural resources. The cultural resources reviews recommended measures for the avoidance and minimization of impacts to known cultural resources and historic properties.

The Study Area for the DOWL (2023) literature review was a 200-foot-wide corridor along the proposed route of the FOC alignment. Within this Study Area, DOWL identified 44 Alaska Heritage Resources Survey (AHRS) sites located within or that intersected the Study Area. Thirty-one (31) of the 44 sites are recorded in the AHRS as being within 10 feet of the proposed Project alignment (the APE). The DOWL (2023) report identified 11 of the 31 sites located within 10 feet of the alignment as eligible, treated as eligible, listed as a contributing property to an eligible historic district, or not formally evaluated for NRHP eligibility. The literature review recommended small, feasible Project redesigns to avoid potential adverse effects to those documented resources, or that no adverse effect was expected from FOC installation techniques (HDD or aerial installation). Table 2 lists historic properties within the Project APE along the Terrestrial Corridor and DOWL's assessment of Project effects and recommendations to avoid the effects. In particular at LIV-00769 and LIV-00503 an alignment redesign was recommended; however, the proposed FOC corridor follows an existing utility corridor with similar subsurface installation methodology and no redesign changes were made.

Table 2. Historic Properties in the Terrestrial Corridor APE Identified During Project Literature Research—Fairbanks to Yukon River.

AHRS NO.	NAME	SITE TYPE	PROJECT EFFECT/RECOMMENDATION
LIV-00122	Tanana Valley Railroad	Structure	No effect as plans call for aerial installation on existing utility poles.
FAI-00344/ LIV-00073	Davidson Ditch	Structure	No effect as plans call for aerial installation on existing utility poles.
LIV-00764	Elliott Highway, Segment B, Bypass Segment B1	Structure, transportation, highway	Redesign recommended to avoid impacting physical integrity of historic property.
LIV-00769	Elliott Highway, Segment B, Bypass Segment B16	Structure, transportation, highway	Redesign recommended to avoid impacting physical integrity of historic property.
LIV-00503	Livengood Mining Historic District	District	Portions are within Elliott Hwy ROW; unlikely to contain any previously undocumented resources. No additional survey recommended.
LIV-00515	Olive to Cleary Creek Ditch	Site, ditch, industry	Recommend redesign to the installation methods to HDD bore to avoid impacting the physical integrity from planned winter trenching.
LIV-00392	Livengood Tram Road (ARC Route 63C- Brooks Tram)	Site, historic road	HDD bore under Livengood Creek. 2012 survey found no evidence of this resource. Project will not adversely affect LIV-00392 at this location.
LIV-00556	Dunbar-Brooks Terminal Trail	Site, trail	Summer trenching proposed within the toe of Elliott Hwy ROW. 2012 survey found no evidence of this resource. Project will not adversely affect LIV-00556 at this location.
LIV-00284	Rosebud Knob Archaeological District	Prehistoric archaeological district comprised of 17 sites within the historic district LIV-170?	Project passes through boundaries of LIV-00284 within established utility corridor. No high potential landforms along FOC alignment. Project will not adversely affect LIV-00284 along this FOC alignment.
LIV-00501	Dalton Highway	Site, transportation, highway	FOC crosses Dalton Highway numerous places using aerial installation on existing utility poles or HDD underneath the highway. Project will not adversely affect LIV-00501 using these installation methods.

4.1.2 Yukon River Communities

The ACRC (2023) report identified three historic properties in the River Corridor review of communities, all falling within the APE. (Table 3). At Rampart, Alaska, the FOC will come ashore within the boundaries of the NHRP-eligible Rampart Historic District (TAN-00008). However, none of the Project activities will cause any adverse effect to any of the properties or contributing elements of the historic district by HDD or aerial installation. At Tanana, the FOC will come ashore within the boundary of the Tanana Federal Aviation Administration Station Facility Historic District (TAN-00056). However, the buildings that made up the district have been moved or demolished so there will be no adverse effect to the district. As the FOC is installed on and then transitions from the E.L. Patton Bridge (LIV-00455) into the Yukon River, there will be no adverse effect to the properties which make the bridge eligible.

Table 3. Historic Properties in the River Corridor Identified During Project Literature Research—Yukon River Communities.

AHRS NO	NAME	SITE TYPE	PROJECT EFFECT/RECOMMENDATION
TAN-00008	Rampart Historic District	Historic District	FOC comes ashore via HDD and BMH. No effect as plans call for aerial installation on existing utility poles.
TAN-00056	Tanana Federal Aviation Administration Station Facility Historic District	Historic District	The last remaining building in the historic district, TAN-00058, the Flight Service Station (FSS) building has been demolished or removed.
LIV-00455	E.L. Patton Bridge	Structure, bridge	Placement of the FOC on the bridge will not alter its continuous orthotropic beam, twin box girder design, nor its instream piers, or its decking. After installation of the FOC, the bridge will retain its integrity of location, design, setting, feeling, and association which results in no adverse effect to the integrity of the properties which make it NRHP eligible.

4.1.3 Canyon Bypass Terrestrial Resources

The Canyon Bypass was researched in the ACRC (2023) cultural resources literature review. The Study Area for the literature review was a corridor 1.5 miles wide either side of the alignment. The APE for the terrestrial alignment in the Canyon Bypass segment is a corridor 30 feet either side of the FOC centerline, 60 feet total in width. No known cultural resources or historic properties were identified in the Canyon Bypass APE. However, no cultural resource surveys have been conducted along the route. A pedestrian survey is planned to take place along the Canyon Bypass alignment prior to the start of construction activities in 2024. The results of that survey will be used to develop mitigation alternatives. In the event that any cultural resources are encountered, they will be evaluated for NRHP-eligibility and most likely can either be avoided through minor FOC alignment reroutes or mitigated through data recovery.

4.1.4 Riverine Cultural Resources

ACRC, under contract to Owl Ridge, performed a cultural resources literature study of the River Corridor (ACRC 2023). The study included a review of the National Oceanic and Atmospheric Administration’s (NOAA) Wrecks and Obstructions database as well as other sources. The study did not identify any documented shipwrecks with clear locations within the River Corridor. The study identified cultural resources located along the riverbanks including archaeological and historic sites and Native Allotments

used for fishing, hunting, and camping. Some of these river fronting sites are NRHP-eligible but are outside the APE for the riverine component. Unless an on-board emergency requires that the CLB land along the Yukon River, no riverine cultural resources are likely to be affected by the Project (ACRC 2023).

4.2 Area of Potential Effect

Based on the Cultural Resource Literature Reviews and data collected from the AHRS database an Area of Potential Effect was developed. The Area of Potential Effect (APE) contains 40 known cultural resources; of these cultural resources, 14 have been determined eligible for, or listed on the National Register of Historic Places (NRHP); and 20 have been determined not eligible; and 6 (six) properties are listed on the AHRS database but do not contain a DOE.

4.3 Avoidance and Minimization of Adverse Effects to Historic Properties

There is low potential for the Project to have adverse effects on known historic properties. This section describes the processes by which Doyon and DeployCom and its contractors shall enact ways to avoid or minimize the potential for the Project to result in unanticipated adverse effects on known and unknown historic properties.

4.3.1 Terrestrial APE Avoidance and Minimization

4.3.1.1 Fairbanks to Yukon River Bridge Corridor and Yukon River Communities

Based on the DOWL (2023) report and mitigation recommendations to avoid or minimize possible impacts to historic properties and cultural resources, changes were made to the FOC alignment between Fairbanks and the Yukon River Bridge and/or additional justification provided as to why these redesign changes were not made (NHTI 2023). Design changes were made at Tanana, Rampart, and Fort Yukon based on community input to avoid impacts to the areas used for barge landings and community access to the waterfront. These changes also had the effect of moving FOC facilities further away from known cultural resources. Table 2 and Table 3 summarize the design changes to mitigate possible impacts.

4.3.1.2 Canyon Bypass Corridor

The probability analysis completed for the Canyon Bypass Corridor concluded that most of the 20-mile route had a moderate/high probability of having prehistoric cultural resources within the APE (ACRC 2023). No ground surveys of the Project area for cultural resources have occurred. To inventory and evaluate the APE, a pedestrian field reconnaissance survey will be conducted in 2024 prior to ground disturbance and construction. The research design and planning for that survey will be prepared and submitted to the land management agencies to obtain permits for the archaeology field survey. The research design will include the elements required for a professional Class II-level survey effort to identify and evaluate cultural resources. Protocols for field methods for survey, testing, recording, and evaluating cultural materials, as well as for handling the discovery of human remains will be part of the research design. Archaeological sites will be identified so that they can be avoided by minor realignment of the FOC. Reports will be submitted to land and resource management agencies and appropriate stakeholders.

4.3.2 Riverine APE Avoidance and Minimization

4.3.2.1 Tanana to Fort Yukon

In order to minimize the potential for adverse effects on known and unknown submerged cultural resources or historic properties within the Yukon River APE, DeployCom (and its contractors) will ensure that the final fiber optic cable alignment avoids any anomalies detected during the MBS scan survey of the river bottom. The submerged cultural resources literature review did not identify any historic properties or known cultural resources within the Yukon River APE. The strategy of anomaly and obstacle avoidance for the safety and integrity of the fiber optic cable river installation using the scratch

and jet plow technologies assures that any cultural resources in the bed of the Yukon River will not be impacted by the Project.

5 FIELDWORK & MONITORING

Prior to construction Phase I/II Cultural Resource Surveys will be completed in areas where new ground disturbance will occur, outside of previously surveyed areas or in areas where there is an undefined boundary with a known AHRS site. Fieldwork for surveys and any monitoring performed will be conducted under the supervision of qualified professionals using methods and best practices that follow the guidance in the relevant Alaska Office of History and Archaeology Historic Preservation Series technical documents.

Fieldwork will be conducted at the terrestrial portions of the Project where literature reviews and previous cultural resource surveys either identified locations with known cultural resources that cannot be avoided through Project redesign, or identified the potential for prehistoric or historic cultural resources being present. Identified areas will be surveyed using appropriate survey methods and best practices as described in the Alaska Office of History and Archaeology Historic Preservation Series Number 18 (2024) (<https://dnr.alaska.gov/parks/oha/hpseries/hp18.pdf>). The research designs in the field permit applications submitted to the state or federal land managing agency will describe the field and laboratory methods to be used, analysis, reporting, curation, and human remains protocols (<https://dnr.alaska.gov/parks/oha/hpseries/hp12.pdf>).

In the event of an Inadvertent Discovery of either non-human materials or human remains, the Inadvertent Discovery vicinity may require monitoring. Consultation, evaluation of the discovery as potentially eligible for the NRHP, and development of a mitigation plan for the discovery may include monitoring of the site or deposit. Monitoring plans will be developed in accordance with guidance and best practices as described in the Alaska Office of History and Archaeology Historic Preservation Series Number 15 (2018) (<https://dnr.alaska.gov/parks/oha/hpseries/hp15.pdf>) and the PA.

6 INADVERTENT/UNANTICIPATED DISCOVERY PLAN

6.1 Project Roles for Identifying and Reporting Inadvertent Discoveries/Human Remains

Pre-construction research efforts identify, evaluate, and mitigate adverse effects to historic properties (e.g., buildings, sites, object, and structures) that might be affected by Project construction activities. Changes to the FOC installation location at certain places in the Project alignment along the Steese, Elliott, and Dalton highways, and within the five communities along the Yukon River were made based on the research evaluation. This research and subsequent changes will result in a low likelihood of encountering cultural resources during Project construction.

However, there is always a remote possibility that trenching, or other ground disturbing activities such as HDD and placement of communications shelters or other Project activities might uncover or disturb a cultural resource. If this happens, this Inadvertent/Unanticipated Discovery Plan provides Project supervisory personnel and employees under their supervision with information and guidance on the procedures to follow. An Alaska Native Organizations and Tribal Government Contacts (Exhibit 3) list is provided in the event of a discovery. Every Project worker is responsible for maintaining vigilance when ground disturbing activities take place. Prior to beginning work, each Project worker will receive Cultural Resources Awareness and Responsibilities Training.

6.2 Cultural Resource Awareness and Responsibilities

The Project has developed a Cultural Resource Awareness and Responsibilities Training. Project personnel will complete this training prior to beginning work on the Project in the field. The course covers the following topics:

- Laws and regulations governing cultural resources, historic properties, and human remains.
- Definitions and examples of cultural resources and historic properties
- Archaeology, ethnography, and history of the Project Area
- Responsibilities of supervisors and workers
- What to do if a cultural resource is discovered during construction
- What to do if Human Remains are discovered during construction
- Notification Flowchart
- Supervisor reporting forms

Project workers will sign the Cultural Resource Briefing Acknowledgement Form (Exhibit 4) following completion of this training. DeployCom and its cultural resources consultant shall maintain these forms until the Project is complete.

6.3 Identification, Notification, Recordation, and Evaluation of Discoveries

In the event that Project workers encounter cultural material (non-human remains) during Project ground disturbing activities, those workers shall immediately stop work in the vicinity and notify the on-site Manager or Supervisor.

6.3.1 On-Site Manager/Supervisor Responsibilities

The on-site Manager or Supervisor shall complete the Cultural Resources Discovery Reporting Form (Exhibit 5) and send the form to the Project cultural resource consultant. The on-site Managers or Field Supervisors are not responsible for implementing procedures beyond the initial Stop Work order and recording and notification requirement to the Project cultural resources consultant.

6.3.2 Project Cultural Resource Consultant Responsibilities

The Project cultural resources consultant will confer with the DeployCom Environmental Coordinator and report the discovery using the Cultural Resources Discovery Reporting Form (Exhibit 5) to the appropriate officials depending upon whether or not human remains are encountered (see Exhibit 6-1 Alaska FiberOptic Project Inadvertent Discovery and Human Remains Field Procedures Flow Chart). If the discovery is determined to be an isolated find, the Stop Work order may be lifted.

6.4 Human Remains Inadvertent Discovery

In the event human remains (suspected or positively identified) are encountered during any Project-related activities, the following procedures must be followed for an inadvertent discovery of any and all human remains, regardless of cultural origin or age; funerary objects; sacred objects; or objects of cultural patrimony. The treatment of human remains is governed by both state and federal laws, and is dependent on land status, postmortem interval (time since death), and biological/cultural affiliation. The term “human remains” in this plan refers to any and all portions of the body of a deceased person and includes any associated objects or items.

Multiple State of Alaska laws govern the treatment of human remains within the State (Alaska Statute [A.S.] 12.65.005, A.S. 11.46.482(a)(3), A.S. 41.35.200, and A.S. 18.50.250). In the event that human remains are encountered at any time during the Project ground disturbing activities, the On-Site Manager, Supervisor, and all Project personnel shall ensure at all times that the remains are treated with dignity and respect.

The steps in the procedures can be summarized as: (1) Stop work immediately; (2) Notify appropriate officials; (3) Determine the forensic status and cultural affiliation; and, (4) Develop a plan of action for

the treatment of the remains. The development of a treatment plan for human remains and non-human remains is consistent with Programmatic Agreement Stipulation V. *Resolution of Adverse Effects*.

Step 1—Human Remains: Stop Work (everyone’s responsibility)

1. Stop work in the immediate area of the discovery to ensure that it is not damaged further.
2. Notify the On-Site Manager or Supervisor immediately.
3. Cover the remains to protect them from the elements and non-Project personnel, flag a 50-foot radius, and erect a barricade around the area to control access.
4. Use appropriate protective measures to cover the discovery from the elements and to shield from view. This could be done with a tarp, shoring up cut banks or trench walls, or making sure water is directed around the immediate area of the discovery. Especially small or fragile items may need to be secured (by placing in plastic bags) but should be left in place to the extent possible.
5. The On-Site Manager or Supervisor is responsible for ensuring that the remains are not disturbed or photographed by unauthorized personnel. Only individuals who have a need to examine the remains under the Plan should be permitted access to them. Protective measures must be maintained until the On-Site Manager or Supervisor receives formal notice that the Project activities can resume in the area of discovery.

These steps are depicted in Exhibit 6 Inadvertent Discovery Procedures – Flowchart, Contacts and Notification Form by Community lists and are to be immediately implemented. Project personnel shall not take pictures of the remains and will not disclose the contents, nature, or location of the discovery to any non-Project persons (except those persons legally authorized to handle the discovery of human remains). The exception to photography is that the On-Site Manager or Supervisor may take such photographs as are necessary to submit with the report of the discovery to the authorities listed in Exhibit 6-2, Alaska FiberOptic Project Inadvertent Discovery and Human Remains Contact Information. The Project shall avoid and minimize the disturbance of the remains until such time as plans for their treatment are established.

Step 2—Human Remains: Notify Appropriate Officials

1. As immediately as practicable, but not later than 24 hours following an inadvertent discovery, the On-Site Manager or Supervisor shall notify the Project cultural resources consultant. The On-Site Manager or Supervisor shall provide the information listed on Exhibit 5, Cultural Resources Discovery Reporting Form, to the consultant. The consultant will then make the notifications to the Alaska State Troopers and the Alaska State Medical Examiner, the SHPO, DeployCom Project Manager, and landowner. The landowner status will determine which organizations are also contacted, using the information listed in Exhibit 6-3. Alaska FiberOptic Project Cultural Resources Notification Form
2. The Project cultural resources consultant in coordination with the DeployCom Environmental Manager will follow the Alaska FiberOptic Project Inadvertent Discovery and Human Remains Field Procedures Flow Chart (Exhibit 6-1) and notify the parties listed for notification within the geographic area of the discovery.

Step 3—Human Remains: Determine Forensic Status and Cultural Affiliation

1. All parties will defer to law enforcement (Alaska State Troopers) and/or the Alaska State Medical Examiner for a determination of whether the remains are historic or of a forensic nature and/or subject to law enforcement investigation. Remains that are subject to further law enforcement investigation will no longer be subject to this plan or procedures.
2. The Project cultural resource consultant will ensure that an SOI-qualified professional examines the human remains to determine cultural and/or racial affiliation. Cultural affiliation means that

there is a relationship of shared group identity that can reasonably be traced historically or prehistorically. This work will include documenting and analyzing the remains so that an independent assessment of cultural or racial affiliation can be made. To the extent practicable, this work will take place at the discovery site, and will only include physical examination of the remains and any associated objects. No biological samples may be directly collected from the remains or associated objects. Soil samples may be collected, as applicable.

3. The SOI-qualified individual will have ten (10) days to conduct the analysis and provide a written report of the findings to the NTIA. The NTIA will then notify the Project Permittee, the SHPO, and landowner or land manager of the findings in the report. Step 4 will then be followed based on the results of the report.

Step 4—Human Remains: Develop a Plan of Action for Treatment of the Remains

1. Federal Lands: if the remains are on federal lands, and determined to be Native American, the federal land managing agency will follow the implementing regulations for the Native American Graves Protection and Repatriation Act (NAGPRA), found at 43 CFR 10.5, and consult with the Tribes listed in Exhibit 6 Inadvertent Discovery Procedures – Flowchart, Contacts and Notification Form by Community. The federal agency is required to develop a NAGRPA Plan of Action in consultation with appropriate Tribes, within 30 days as required by 43 CFR 10.5(d). Consultation for the plan of action will determine appropriate treatment of the remains or objects and a course of action for excavation, custody, and other factors to complete the disposition process.

a. The Permittee is responsible for covering costs associated with the development of the NAGPRA Plan of Action and the disposition of the remains or objects. This may include hiring SOI-qualified individuals to assist and facilitate the process. The managing agency will consult directly with the Permittee, as necessary.

b. The remains will stay in place at the discovery site during the development of the Plan of Action. The remains must be monitored daily by an authorized individual to ensure they are not being harmed or degraded. If they are, the on-site Manager must immediately notify the agency, who will then consult with the SHPO and Tribes on emergency procedures, pursuant to 43 CFR 10.3(b), and will notify the Permittee of appropriate procedures to implement.

c. If, after 30 days, the agency and Tribe(s) have not reached consensus on a signed Plan of Action, the agency will direct the Permittee to ensure an SOI-qualified individual excavates and removes the discovery in accordance with 43 CFR 10.6. The remains will be treated with dignity and respect at all times, and to the extent possible, the work will incorporate any culturally appropriate treatment that is shared with the agency during consultation. The SOI-qualified individual is responsible for securing, packing, and transferring the remains to the agency. From that point forward, the agency will be responsible for the care of the remains until disposition, following 43 CFR 10.7, can be completed.

d. Following completion of the excavation and removal, the agency will provide written notification to the Permittee that work may proceed at the discovery location.

2. Non-Federal Lands or Non-Native American Remains: If the remains are found on non-federal lands, or are on federal lands but determined in Step 3 to not be Native American, the Permittee will notify the parties in Exhibit 6 Inadvertent Discovery Procedures – Flowchart, Contacts and Notification Form by Community of the discovery. To the extent possible, NTIA will seek to identify lineal descendants to determine treatment of the remains. If lineal descendants cannot be identified, NTIA will facilitate consultation among the land manager or landowner, the SHPO, and interested parties to develop a plan of action to determine appropriate treatment, removal, and/or disposition measures for the remains or objects. Development of the plan of action may take up to 30 days. If the remains are archaeological in nature, then additional consultation will be required regarding potential eligibility for

the NRHP. The NTIA plan must be approved by the land manager or landowner and the SHPO before it can be implemented. NTIA is responsible for covering costs associated with the consultation, treatment, removal, and disposition measures.

a. To the extent possible, the remains should stay in place at the discovery site during the development of the plan of action unless they are unsecure or threatened by exposure. The remains must be monitored daily by an authorized individual to ensure they are not being harmed or degraded. If an SOI-qualified individual is on site, he/she may implement emergency procedures and notify NTIA, the land manager or landowner of the action(s). If an SOI-qualified individual is not there, an On-Site Manager must immediately notify the land manager or landowner, who will then consult with the SHPO on emergency procedures and will notify the Permittee of appropriate procedures to implement.

b. NTIA is responsible for implementing the plan of action and must provide a final report or memo that describes how and when the measures were implemented. The land manager or landowner, and SHPO must approve the report/memo before it can be considered finalized. In general, the approval of the report/memo will indicate that Section 106 compliance has been met. However, Project work at the location cannot continue until the Permittee receives written notification from NTIA that work may resume.

7 COLLECTION AND CURATION PROTOCOLS FOR CULTURAL RESOURCES (NOT HUMAN REMAINS)

As soon as practicable following a discovery which does not contain definitive or suspected human remains, and no later than within one (1) business day, the On-Site Manager or Supervisor shall provide the information listed on Exhibit 5, Cultural Resources Discovery Reporting Form to the Project cultural resources consultant. The consultant will then make the notifications to the SHPO, Doyon, DeployCom Project Manager, and landowner. The landowner status will determine which organizations are also contacted, using the information listed in the appropriate Exhibit 6-2 Alaska FiberOptic Project Inadvertent Discovery and Human Remains Contact Information.

Consistent with PA Stipulation IV: *Cultural Resource Inventory Efforts* and V: *Resolution of Adverse Effects*, PA Signatories and consulting parties will confer within three (3) business days to determine if the discovery represents a potential historic property (one that is eligible for listing on the NRHP), and what avoidance measures of the discovered feature or objects are practical to prevent further disturbance to the discovery.

1. If NTIA determines through consultation that the discovery is eligible for the NRHP and SHPO concurs, NTIA, SHPO, Doyon, and DeployCom shall continue consultation to determine an appropriate treatment plan to resolve adverse effects within seven (7) days.
2. If NTIA determines through consultation that the discovery is not eligible for the NRHP, and SHPO concurs, NTIA shall provide Doyon and DeployCom with written notification within one (1) business day that construction activities may proceed within the 50-foot buffer zone.
3. No further ground disturbing work may commence within the 50-foot buffer zone around the discovery until written authorization from NTIA and SHPO has been obtained that indicates Project activities may proceed in the discovery buffer.

While efforts have been made to identify cultural resources/historic properties prior to the start of construction, there is always the possibility that ground disturbing activities may uncover cultural materials. Within established communities, the most likely type of materials to be encountered are modern artifact scatters (MAS), or Isolated Finds. Isolated Finds may contain metal, plastic, wood, or paper products from the historic period. Examples include nails, screws, metal fittings, transportation related items such as automobile, truck, snowmachine or ATV parts, glass bottles, household items, and

discarded animal bones. If such material is encountered, the On-Site Manager or Supervisor shall stop construction in the immediate vicinity and establish a No Work buffer around the materials. He/she will photograph, describe, and report the materials as outlined in Exhibit 5, Cultural Resources Discovery Reporting Form.

Upon reviewing the report, DeployCom and its cultural resource consultant will carry out the flowchart procedures for a “No Human Remains” inadvertent discovery. Any archaeological or historic resources including Isolated Finds or MAS sites discovered during the Project construction process are the property of the landowner, or land manager. If the materials found are determined eligible for listing on the NRHP, they may be recorded, collected, treated for conservation (if necessary) and cataloged for curation according to an accepted treatment plan.

Curation

The University of Alaska Museum of the North (UAMN) is the designated repository for materials collected during the Project. NRHP-eligible materials will be curated at the UAMN until such time as they may be returned to the landowner or land manager if that party desires to curate the materials in some other approved repository. Historic artifacts will only be collected and prepared for curation if they are highly unique and show some element that is diagnostic, for example “makers’ marks”, identifiable patterns, serial/model number data plates. Such objects may include ceramics, glass containers, metal containers, and fragments of such items. Prehistoric features or materials will be excavated, analyzed, and reported after the development of an approved excavation plan. The materials will be packaged for transport to the UAMN for processing. “Materials” in this context 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 CRMP, with the exception of information that is subject to confidentiality clauses of the NHPA, the Archaeological Protection Act (ARPA) and Alaska State law.

8 CONFIDENTIALITY

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

Information relating to the nature and location of certain archaeological resources is not subject to state public disclosure laws or Freedom of Information Act (FOIA) disclosure. Consequently, all cultural resource information—including reports and mapping—must be kept restricted and confidential, and shared only among those parties with a ‘need to know’. Documents which disclose this information should be clearly marked as confidential.

Doyon and DeployCom shall require that employees, contractors and subcontractors, consultants and subconsultants keep the discovery of any archaeological resources confidential, including but not limited to refraining from contacting the media, responding to media questions, posting information on social media, or otherwise sharing information regarding the discovery with any member of the public.

9 REPORTING

Consistent with the terms and provisions of the Project PA, Doyon, DeployCom, or consultants hired on its behalf, will prepare plans and reports (“reports”) of activities, including associated site records, and submit them to NTIA, Doyon, SHPO, and other consulting parties as necessary to fulfill the terms of the PA. The PA for the Project outlines the report submittal and approval process for these reporting efforts (Stipulation III.D).

Implementation of this CRMP will require that DeployCom or its cultural resources consultant, at a minimum, prepare and submit the following reports:

- Report describing and evaluating any cultural resources encountered during construction
- Report describing the methods and results from the cultural resources survey of the Canyon Bypass route around the Rampart Canyon Rapids
- Annual Report required under the terms of the PA.
- If needed, report of analysis of human remains for forensic status and cultural affiliation.

Reports prepared to fulfill these reporting responsibilities will be prepared by a professionally qualified individual as set forth in Secretary of Interior (SOI) Standards and meeting the report standards established by the Alaska Office of History and Archaeology.

10 CRMP REVISIONS AND AMENDMENTS

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

11 REFERENCES

Alaska Cultural Resources Consultants, LLC (ACRC)

2023 *The Alaska FiberOptic Project Fort Yukon to Tanana Cultural Resources Literature Review*. Report prepared for Owl Ridge Natural Resources Consultants, Inc., Anchorage, Alaska by Alaska Cultural Resources Consultants, LLC.

Alaska Office of History and Archaeology, (OHA)

2018a *Archaeological Research Designs*. Revised May 2018 ed. Historic Preservation Series. No. 12. Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Office of History and Archaeology, Anchorage, Alaska.

2018b *Monitoring Guidelines*. Revised May 2018 ed. Historic Preservation Series. No. 15. Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Office of History and Archaeology, Anchorage, Alaska.

2024 *Survey Methods*. January 2024 ed. Historic Preservation Series. No. 18. Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Office of History and Archaeology, Anchorage, Alaska.

DOWL

2023 *Cultural Resources Literature Review and Recommendations. New Horizons Telecom, Inc. Fairbanks—Yukon Fiber Route*. Report prepared for New Horizons Telecom, Inc., Palmer, Alaska by DOWL, Anchorage, Alaska.

New Horizons Telecom, Inc. (NHTI)

2023 *Cultural Resources Memorandum—Review and Actions for Federal Compliance for Doyon Fiber Optic Cable between Fairbanks and Yukon River*. Memorandum (8 pages) to Brooke Therrien, Owl Ridge Natural Resource Consultants, Anchorage, Alaska from NHTI, Wasilla, Alaska.

Territory Heritage Resource Consulting (THRC)

2012 *Cultural Resource Literature Review, Fox-Yukon River Fiber Route Construction, Elliott and Dalton Highways, Alaska*. Report prepared for New Horizons Telecom, Inc. by Territory Heritage Resource Consulting, Anchorage, Alaska.

U.S. Department of the Interior, Office of the Secretary

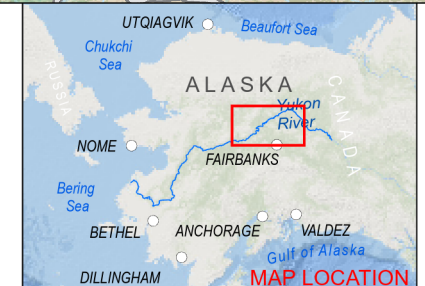
2023 Final Rule—14 CFR Part 10, Native American Graves Protection and Repatriation Act (NAGPRA) Systematic Processes for Disposition or Repatriation of Native American Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony. Federal Register 88(238 Wednesday, December 13, 2023):86452–86540 (effective January 12, 2024).

EXHIBITS

EXHIBIT 1. ALASKA FIBEROPTIC PROJECT LOCATION MAP



- | | |
|--------------------------------|-----------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | Scratch Plow |
| ▤ Parks, Preserves and Refuges | Canyon Bypass (Terrestrial) |
| — Highway | Jet Plow |
| | Terrestrial |



ALASKA FIBEROPTIC PROJECT
PROJECT LOCATION MAP

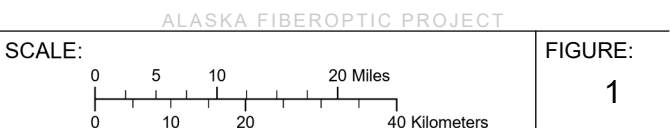


EXHIBIT 2. LIST OF NRHP SITES AND SUMMARY OF DESIGN CHANGES TO MITIGATE IMPACTS

SUMMARY OF DESIGN CHANGES TO MITIGATE IMPACTS

AHRS NO	NAME	SITE TYPE	PROJECT EFFECT/RECOMMENDATION	Elements	OTHER AHRSNO NRHP STATUS
LIV-00122	Tanana Valley Railroad	Structure	No effect as plans call for aerial installation on existing utility poles.	Abandoned railbed, rail ties	FAI-00230, FAI-00209 DOE-S
FAI-00344/ LIV-00073	Davidson Ditch	Structure	No effect as plans call for aerial installation on existing utility poles.	Manmade earthen structure, wood flumes, penstocks, etc.	LIV-73, CIR-010 DOE-K (A,C,D)
LIV-00764	Elliott Highway, Segment B, Bypass Segment B1	Structure, transportation, highway	Although an alignment redesign was recommended, the proposed corridor follows an existing utility corridor with similar subsurface installation methodology.	Gravel roadbed, one travel lane, embankment	DOE-S (A)
LIV-00769	Elliott Highway, Segment B, Bypass Segment B16	Structure, transportation, highway	Although an alignment redesign was recommended, the proposed corridor follows an existing utility corridor with similar subsurface installation methodology.	Gravel roadbed, one travel lane, embankment	DOE-S (A)
LIV-00503	Livengood Mining Historic District	District	850 ft are within Elliott Hwy ROW; unlikely to contain any previously undocumented resources. No additional survey recommended.	Numerous contributing elements	DOE-S (A,D)
LIV-00515	Olive to Cleary Creek Ditch	Site, ditch, industry	Recommend redesign to the installation methods to HDD bore to avoid impacting the physical integrity from planned winter trenching.	Not individually eligible, but eligible as a contributing element to LIV-00503 HD	(DREJ-S). Contributing property within an eligible district (DXS)
LIV-00392	Livengood Tram Road (ARC Route 63C-Brooks Tram)	Site, historic road	HDD bore under Livengood Creek. 2012 survey found no evidence of this resource. Project will not adversely affect LIV-00392 at this location.	Linear resource, unclear from AHRS info if physical remains are present.	Alaska Gasline Development Corporation determined this site is not eligible for the NRHP. SHPO

AHRS NO	NAME	SITE TYPE	PROJECT EFFECT/RECOMMENDATION	Elements	OTHER AHRSNO NRHP STATUS
					recommends further identification efforts (October 2019). Pending consultation between SHPO and agency (DOE-P-S)
LIV-00556	Dunbar-Brooks Terminal Trail	Site, trail	Summer trenching proposed within the toe of Elliott Hwy ROW. 2012 survey found no evidence of this resource. Project will not adversely affect LIV-00556 at this location.	No physical evidence of this site at the Project location.	(DOE-S) (A). SEE ALSO FAI-02102
LIV-00284	Rosebud Knob Archaeological District	Prehistoric archaeological district comprised of 17 sites within the historic district	Project passes through boundaries of LIV-00284 within established utility corridor. No high potential landforms along FOC alignment. Project will not adversely affect LIV-00284 along this FOC alignment.	Prehistoric sites exist within the HD	(DOE-S) (D) Closed for other reason - needs re-evaluation (NRXCL)
LIV-00501	Dalton Highway	Site, transportation, highway	FOC crosses Dalton Highway numerous places using aerial installation on existing utility poles or HDD underneath the highway. Project will not adversely affect LIV-00501 using these installation methods.	Character defining elements of the Dalton Highway will not be adversely affected by the Project.	
LIV-00455	E.L. Patton Bridge	Structure, bridge	Placement of the FOC on the bridge will not alter its continuous orthotropic beam, twin box girder design, nor its instream piers, or its decking. After installation of the FOC, the bridge will retain its integrity of location, design, setting, feeling, and association which results in no adverse effect to the	Bridge built 1975-continuous orthotropic beam, twin box girder bridge measuring 2,295 ft x 31 ft wide. The bridge is designed to span the 2,000 ft river with 5 instream piers	(DOE-S) (A,G)

AHRS NO	NAME	SITE TYPE	PROJECT EFFECT/RECOMMENDATION	Elements	OTHER AHRSNO NRHP STATUS
			integrity of the properties which make it NRHP eligible.	spaced at 410 ft intervals and two 310 ft approach spans. Piers are reinforced concrete on lower portion, varying from 50 ft to 86 ft, with steel frames above.	
TAN-00008	Rampart Historic District		FOC comes ashore via HDD and BMH. No effect as plans call for aerial installation on existing utility poles.	Historic district has not been surveyed and contributing elements recorded.	(DOE-S). (A,D)
TAN-00056	Tanana Federal Aviation Administration Station Facility District		One remaining building in historic district, TAN-00058, Building 400, Flight Service Station, has been demolished and removed.	No physical remains	(DOE-S) (C). Demolished and removed.
TAN-00106	Tanana Indian Health Service Hospital complex Historic District	Structures	All of the contributing buildings to the District have been demolished or removed after HABS recording.	No physical remains	DOE-S (A) Demolished or removed.

KEY:	DREJ-S	Determined Not Eligible by SHPO and Agency
	DOE-S	Determined eligible by SHPO and agency
	DOE-K	Determined eligible by the Keeper of the National Register
	DXS	Contributing property within an eligible district
	DOE-P-S	Pending consultation between SHPO and Agency
	NCP	Non-contributing property within an eligible district.
	ND	No Data in AHRS record
	No DOE	No Determination of Eligibility
	NRHP	Listed on the National Register of Historic Places
	DEST	Side destroyed
	RNE	CRM reports recommended not eligible for NRHP listing. Not clear if SHPO concurred.
	(A) (B) (C) (D)	National Register of Historic Places eligibility criteria.

EXHIBIT 3. ALASKA NATIVE ORGANIZATIONS AND TRIBAL GOVERNMENT CONTACTS

Alaska FiberOptic Project: Contact List for Discovery of Human Remains

Alaska Native Corporations							
	Point of Contact	Title	Mailing Address	Phone Number	Email	Website	Notes
Doyon, Limited	Allen Todd	General Counsel	1 Doyon Place, Suite 300 Fairbanks, Alaska 99701	907-459-2000	todda@doyon.com	www.doyon.com	Interior Regional ANCSA Corporation
Baan-O-Yeel Kon Corporation	Marjorie Merry	President	P.O. Box 74381 Fairbanks, Alaska 99707	907-456-6529	boyk@mosquitonet.com	www.baanoyeelkon.com	Rampart ANCSA Corporation.
Beaver Kwit'chin Corporation	Doreen Deaton	President	344 Minnie Street Fairbanks, Alaska 99701	907-628-6126	doreendeatonbkc@gmail.com	Not available	Beaver ANCSA Corporation
Dinyea Corporation	Randy Mayo	President	PO Box 71372 Fairbanks, Alaska 99707	907-699-2128	randyamayo@gmail.com	Not available	Stevens Village ANCSA Corporation
Gwitchyaa Zhee Corporation	Josh Nadell	President	P.O. Box 329 Fort Yukon, Alaska 99740	907-662-2933	josh@gzcorporation.org	www.gzcorporation.org	Fort Yukon ANCSA Corporation
Seth-De-Ya-Ah Corporation	Cameron Winfrey	President	615 Bidwill Avenue, Suite 407 Fairbanks, Alaska 99701	907-457-1061	cameron@sethcorporation.com	https://seth-de-ya-ah.com	Minto ANCSA Village Corporation
Tozitna, Limited	Nina Heyano	President	P.O. Box 190 Tanana, Alaska 99777	907-366-7255	president@tozitna.com manager@tozitna.com	https://www.facebook.com/Tozitna/	Tanana ANCSA Corporation
K'oyitl'ots'ina Limited			1603 College Road, Fairbanks, AK 99709	907-452-8119	info@kcorpalska.com	www.koyitlotsina.com/	Alatna, Allakaket, Hughes, and Huslia ANCSA Corporation
Nunamiut Corporation Incorporated			1038 Summer St., Anaktuvuk Pass, AK 99721	907-661-3220	nancy.andrew@nunamiut.com	https://www.asrc.com/	Anaktuvuk Pass ANCSA Corporation
Tihtet'aa'i Incorporated			P.O. Box 71372, Fairbanks, AK 99701	907-455-8484	angela@birchcreektribe.org	Website not available	Birch Creek ANCSA Corporation
Chalkyitsik Native Corporation			P.O. Box 53, Chalkyitsik, AK 99788	907-848-8112	Email not available.	Website not available	-
Danzhit Hanlaih Corporation			P.O. Box 71372, Fairbanks, AK 99701	907-455-2288	Email not available.	Website not available	Circle ANCSA Corporation
Hungwitchin Corporation			P.O. Box 84594, Fairbanks, AK 99708	907-778-2231	Email not available.	www.hungwitchin.org	Eagle Village ANCSA Corporation
Evansville Incorporated			P.O. Box 72579, Fairbanks, AK 99707	907-374-7084	evansvillecorporation@gmail.com	www.evansvillecorporation.com/home	-
Gana-A'Yoo Limited			1001 E. Benson Blvd., Suite 201, Anchorage, AK 99508	907-569-9599	info@ganaayoo.com	ganaayoo.com/	Galena, Koyukuk, and Nulato ANCSA Corporation
Mendas Cha-ag Native Corporation			457 Cindy Drive, Fairbanks, AK 99701	907-452-3094	hockeyfrenz@hotmail.com	mendaschaagnativecorporation.com	Healy Lake ANCSA Corporation
Bean Ridge Corporation			P.O. Box 82062, Fairbanks, AK 99708	907-458-2176	dixie.dayo@beanridgecorp.com	Website not available	Manley Hot Springs ANCSA Corporation
MTNT Limited			400 W. Tudor Rd., Ste. A-400, Anchorage, AK 99503	907-644-1200	info@mtnt.net	www.mtnt.net/	McGrath, Takotna, and Telida ANCSA Corporation
Toghotthele Corporation			P.O. Box 249, Nenana, AK 99760	907-832-5832	admin@togcorp.net	togcorp.net/	Nenana and Nikolai ANCSA Corporation
Dineega Corporation			P.O. Box 28, Ruby, AK 99768	907-468-4405	Email not available.	Website not available	Ruby ANCSA Corporation
Tanacross Incorporated			P.O. Box 76029, Tanacross, AK 99776	907-833-4130	taninc@aptalaska.net	www.tanacrossinc.com	-
Tetlin Native Corporation			P. O. Box 657, Tok, AK 99780	907-280-9498	tetlin@tetlincorp.com	www.tetlincorp.com/	-
Ahtna Inc			115 Richardson Hwy Glennallen, Alaska 99588	907-822-3495		https://www.ahtna.com/	Cantwell ANCSA Corporation

Alaska FiberOptic Project: Contact List for Discovery of Human Remains

Tribes (Tribal Government)							
Organization Name	Point of Contact	Title	Mailing Address	Phone Number	Email	Website	Notes
Beaver Village Council	Rhonda Pitka	Chief	P.O. Box 24029 Beaver, Alaska 99724	907-628-6126	rpitka@beavercouncil.org	Website not available.	-
Gwichyaa Zhee Gwich'in Tribal Government	Melanie Herbert	Executive Director	P.O. Box 126 Fort Yukon, Alaska 99740	907-662-2581	michael.hardy@fortyukon.org ; melanie.herbert@fortyukon.org	www.fortyukon.org	Also known as Native Village of Fort Yukon
Native Village of Minto	Clifford Charlie	President	P.O. Box 26 Minto, Alaska 99758	907-789-7112	mintovillagecouncil@hotmail.com	Website not available.	-
Rampart Village	Michael Wiehl	First Chief	P.O. Box 29 Rampart, Alaska 99767	907-358-3312	rvc.irr@gmail.com	Website not available.	-
Native Village of Stevens	Michael Simon	President	P.O. Box 74016 Stevens Village, Alaska 99774	907-888-7414 907-478-7228	margaret.matthew@tanachiefs.org ; svs.ira.council@gmail.com	Website not available.	-
Tanana Tribal Council	Victor Joseph	Executive Director	P.O. Box 130 Tanana, Alaska 99777	907-366-7170	executivedirector@tananatribe.org	Website not available.	-
Alatna Village	Harding Sam	Chief	PO Box 70, Allakaket, AK 99720	907-968-2261	alatnatribe@gmail.com	Website not available.	-
Allakaket Village	Gordon Bergman	First Chief	PO Box 50, Allakaket, AK 99720	907-968-2237	allakaketepa@yahoo.com ; charlenened15@hotmail.com	Website not available.	-
Village of Anaktuvuk Pass	Timothy Ahgook	President	PO Box 21170, Anaktuvuk Pass, AK 99721	907-661-2575	julie.morry@inupiatgov.com ; karlene.ticket@inupiatgov.com	Website not available.	-
Arctic Village	Robert Sam	First Chief	PO Box 22069, Arctic Village, AK 99722	907-587-5523	av_council@hotmail.com ; margoriegemmillava@gmail.com ; avc.robertsam@gmail.com	Website not available.	-
Birch Creek Tribe	Jacqueline Baalam	First Chief	PO Box 73505, Fairbanks, AK 99707	907-221-2211	jbaalam@hotmail.com ; birchcreektribe@gmail.com ; victoria@birchcreektribe.org ; admin@birchcreektribe.org	www.birchcreektribe.org	-
Native Village of Cantwell	Rene Nicklie	President	PO Box 94, Cantwell, AK 99729	907-768-2591	hallvc@mtaonline.net	Website not available.	-
Chalkyitsik Village	Stephanie Herbert	First Chief	PO Box 57, Chalkyitsik, AK 99788	907-848-8117	tamhenry40@hotmail.com ; tru_native_69@yahoo.com ; kyle.joseph.ak@gmail.com	Website not available.	-
Cheesh-Na Tribe	Danielle Boston	President	PO Box 241, Gakona, AK 99586	907-822-3503	tribaladmin@cheeshna.com ; kmorris@cheeshna.com ; dboston@cheeshna.com	www.cheeshna.com	Chistochina tribal unit
Circle Native Community	Dennis Carroll	First Chief	PO Box 89, Circle, AK 99733	907-773-2822	jessica.fields@tanachiefs.org	Website not available.	-
Native Village of Eagle	Karma Ulvi	First Chief	PO Box 19, Eagle, AK 99738	907-547-2281	eaglevillagecouncil@yahoo.com ; karma.ulvi@tanachiefs.org ; eaglevillagecouncil@outlook.com	Website not available.	-
Evansville Village	Frank Thompson	First Chief	PO Box 26087, Bettles Field, AK 99726	907-692-5005	evansvillealaska@gmail.com ; frankiefigsak@gmail.com	Website not available.	-
Native Village of Gakona	Darin Gene	President	PO Box 102, Gakona, AK 99586	907-822-5777	gakonaadmin@cvineternet.net	www.nvgakona.com	-
Galena Village	Charlie Green	First Chief	100 Tiger Highway, Galena, AK 99741	907-656-1711	estherwarner@hotmail.com ; office@loudentribe.com	Website not available.	Aka Louden Village
Gulkana Village Council	Eileen Ewan	President	PO Box 254, Gulkana, AK 99586	907-822-3746	admin@gulkanacouncil.org ; releazer@gulkanacouncil.org	www.gulkanacouncil.org	-
Healy Lake Village	Patricia MacDonald	President	PO Box 60300, Fairbanks, AK 99706-0300	Phone number not available.	bertha.rickman@tanachiefs.org ; evelynn.combs@tanachiefs.org ; eviecombs@hotmail.com	Website not available.	-
Hughes Village	Wilmer Beetus	First Chief	PO Box 45029, Hughes, AK 99745	907-889-2239	ella.sam@tanachiefs.org ; eileen.jackson@tanachiefs.org	Website not available.	-
Huslia Village	Norman Burgett	First Chief	PO Box 70, Huslia, AK 99746	907-829-2294	husliatribe@gmail.com	Website not available.	-
Native Village of Kobuk	Henry Horner	President	PO Box 51039, Kobuk, AK 99751	907-948-2203	tribeadmin@laugvik.org	Website not available.	-
Koyukuk Native Village	Leo Loinitz	First Chief	PO Box 109, Koyukuk, AK 99754	907-927-2253	kathryn.folger@tanachiefs.org ; mineelghaadzetoh@outlook.com	Website not available.	-
Manley Hot Springs Village	Raymond Woods	Chief	PO Box 105, Manley Hot Springs, AK 99756	907-672-3180	emwoods57@gmail.com	Website not available.	-
McGrath Native Village	Alice Dale	First Chief	PO Box 134, McGrath, AK 99627	907-524-3024	gina.mckindy@tanachiefs.org ; tribaladmin@mcgrathnvc.com ; adale@mcgrathnvc.com	Website not available.	-
Mentasta Traditional Council	Emmanuel Baker	First Chief	PO Box 6019, Mentasta, AK 99780-6019	907-291-2319	mentastatraditionalcouncil@yahoo.com ; 907mlv99780ta@gmail.com	Website not available.	-
Nenana Native Association	Conrad McManus	First Chief	PO Box 369, Nenana, AK 99760	907-832-5461	ta.nnc@outlook.com ; doncharlie_85@hotmail.com ; rcadiente99760@gmail.com	Website not available.	-
Nikolai Village	Vernon John	First Chief	PO Box 9107, Nikolai, AK 99691	907-293-2311	beverly.gregory@tanachiefs.org ; nickalexia@hotmail.com	Website not available.	-
Nulato Village	Douglas Patsy	First Chief	PO Box 65049, Nulato, AK 99765	907-898-2339	nulatotribe@hotmail.com	Website not available.	-
Native Village of Ruby	Patrick McCarthy	First Chief	PO Box 68210, Ruby, AK 99768	907-468-4479	rbynativecouncil@hotmail.com	Website not available.	-
Native Village of Shungnak	Frederick Sun	President	PO Box 73064, Shungnak, AK 99773	907-437-2163	tribeclerk@issingnak.org ; tribeadmin@issingnak.org	Website not available.	-
Takotna Village	Vera Goods	Chief	PO TYC, Takotna, AK 99675	907-298-2212	takotnatribalcouncil@gmail.com ; lynn_goods@yahoo.com	Website not available.	-
Native Village of Tanacross	Herbert Demit	President	PO Box 76009, Tanacross, AK 99776	907-883-4008	herbert.demit@tanachiefs.org ; issac_monica@yahoo.com ; jerry_isaac@hotmail.com	Website not available.	-

Alaska FiberOptic Project: Contact List for Discovery of Human Remains

Telida Village	Bernie Gregory	First Chief	PO Box 9104, Nikolai, AK 99691	907-293-2440	kuskoyim@aol.com	Website not available.	-
Native Village of Tetlin	Michael Sam	President	PO Box 797, Tok, AK 99780	907-883-2021	tetlinvillagecouncil@gmail.com	Website not available.	-
Native Village of Venetie Tribal Government	Steve Frank	First Chief	PO Box 81080, Venetie, AK 99781	907-849-8165	venetietribal@yahoo.com	Website not available.	-
Village of Venetie	Eddie Frank	First Chief	PO Box 81119, Venetie, AK 99781	907-849-8212	venetievillagecouncil@yahoo.com ; cwtackett7@outlook.com	Website not available.	-
Native Village of Dot Lake	Tracy Charles-Smith	President	10 Charles Street Dot Lake, AK 99737	907-882-2695	ridge@gci.net	Website not available.	-

EXHIBIT 4. CULTURAL RESOURCE BRIEFING ACKNOWLEDGEMENT FORM

EXHIBIT 5. CULTURAL RESOURCES DISCOVERY REPORTING FORM

CULTURAL RESOURCES DISCOVERY REPORTING FORM

Date and Time of Find:	Project Site Location:
Name of Person Reporting Find:	Phone/email:
Activity Occurring at Time of Discovery:	
Was Work Stopped (Y/N)?	
Date and Time Work Stopped:	Date and Time Work Resumed:
Was a Buffer Zone Established (Y/N)?:	Buffer Zone Size:
GPS Points Recorded? (Y/N)?	
GPS Coordinates:	
Photographs Taken (Y/N)?	
Photograph Numbers:	
Is the Find Human Remains or Likely Associated Funerary Objects (Y/N)?	
Is the Find Cultural Resources (Y/N)?	
Is the Discovery an Isolated Find (Y/N)?	
Name of Person Notified of the Find?	Date/Time of Notification:

Detailed Description of the Find:

continue on another sheet of paper if additional space is needed.

EXHIBIT 6. INADVERTENT DISCOVERY PROCEDURES—FLOWCHART, CONTACTS, AND NOTIFICATION FORM BY COMMUNITY

Exhibit 6-1. Alaska FiberOptic Project Inadvertent Discovery and Human Remains Field Procedures Flow Chart

Exhibit 6-2. Alaska FiberOptic Project Inadvertent Discovery and Human Remains Contact Information

Exhibit 6-3. Alaska FiberOptic Project Cultural Resources Notification Form

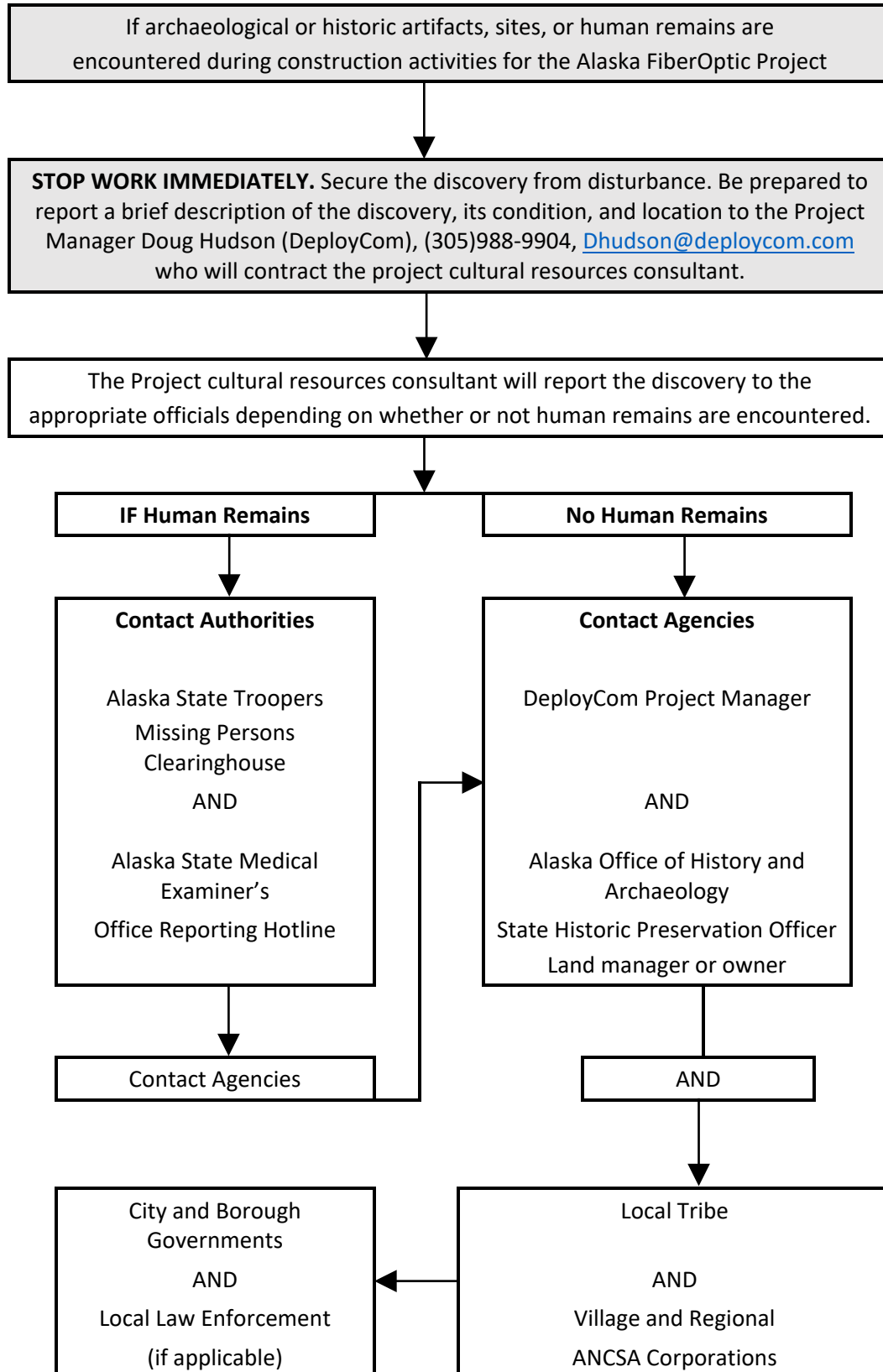
Contact Lists are included for these communities and geographic areas of the Alaska FiberOptic Project, for the 2024 and 2025 construction seasons.

- Fort Yukon
- Beaver
- Stevens Village
- Rampart
- Tanana

Discovery Along Yukon River, Outside of a Community Or In the Canyon Bypass

Discovery Between Fairbanks and the E.L. Patton Yukon River Bridge

EXHIBIT 6-1. ALASKA FIBEROPTIC PROJECT INADVERTENT DISCOVERY AND HUMAN REMAINS FIELD PROCEDURES FLOW CHART



**EXHIBIT 6-2. ALASKA FIBEROPTIC PROJECT INADVERTENT DISCOVERY AND HUMAN REMAINS
CONTACT INFORMATION**

For DeployCom and its Contractors Field Personnel and On-Site Supervisors

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

1. Stop all work in the area of the discovery. Take the necessary measures to secure a 100-foot radius buffer zone around the discovery site with high visibility flagging or staking.
2. Immediately notify DeployCom (Doug Hudson) at (305)988-9904 and by email at Dhudson@deploycom.com and report as much of the following information about the discovery as possible, including:
 - a. Description of the discovery (is it an artifact/site/structure/burial etc.)
 - b. Location of the discovery (GPS coordinates, community, general location within 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)
 - d. Your name, mobile phone number, email, date/time of the notification
3. Keep location information confidential. Do not share with other contractors or personnel who are not directly working at the site.
4. Do not resume work in the area until directed by an authorized supervisor.

For Owl Ridge and its Contractors

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

- If the resource(s) encountered include human remains, you are legally obligated to immediately contact the Alaska State Troopers Missing Persons Clearinghouse 907.123.4567 and the Alaska State Medical Examiner's Office Reporting Hotline 907.334.2200 and provide them with any requested information.
 - They may request that a qualified archaeologist assess the age of the remains, or they may send a law enforcement officer to examine the remains.
- If no human remains are present, contact NTIA, SHPO, the land owner or manager, the local Tribe, ANCSA Corporations, and city and borough governments.

Based on Discovery location, see the applicable Contact Notification Forms for contact information (Exhibit 5-3).

 - NTIA contact information: Andy Bielakowski, 202.657.7982 Andrew.Bielakowski@firstnet.gov
 - Alaska State Historic Preservation Office: Judith Bittner, SHPO 907.269.8721 OR Richard VanderHoek, Deputy SHPO 907.269.8700
 - Contact the land owner or manager
 - Contact the local Tribe
 - Contact the Village and Regional ANCSA Corporations
 - Contact the appropriate City and Borough Governments and law enforcement (if applicable)
- Provide each contact with the following information:
 - Brief description of the project-related activity that encountered the discovery
 - Description of the resource(s) encountered, their current condition, and the protective measures used to safely and respectfully secure the resource from any anticipated disturbances
- Follow the steps in the Cultural Resources Management Plan for additional steps regarding inadvertent discoveries

EXHIBIT 6-3. ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION GENERIC FORM

Community Name or Geographic Area: _____

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlrIDGE.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Native Village of NAME HERE				
Village Corporation NAME HERE				
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		

Contact Name and Affiliation	Phone	Email	Date	Time
CITY of CITYNAME HERE				
NAME, TITLE				
BOROUGH OR OTHER LOCAL GOVERNMENT				
Name, Title				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334-2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				
Generic contact form developed 12/27/2023. Update and complete for each community, geographic location of a possible inadvertent discovery.				

**ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
GENERIC (FORT YUKON)**

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlrIDGE.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Gwichyaa Zhee Gwich'in Tribal Government, Native Village of Fort Yukon				
Melanie Herbert	907.662.2581	melanie.herbert@fortyukon.org		
Gwitchyaa Zhee Corporation, Fort Yukon ANCSA Village Corporation				
Josh Nadell	907.662.2933	josh@gzcorporation.org		
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		
City of Fort Yukon				
Paul Shewfelt	907.662.2479 907.662.5176	citymanager@fortyukon.us		

Contact Name and Affiliation	Phone	Email	Date	Time
BOROUGH OR OTHER LOCAL GOVERNMENT				
Not Applicable				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records	T: 907.465.5423 F: 907.465.3423			

**ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
GENERIC (BEAVER)**

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlrIDGE.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Beaver Village Council				
Rhonda Pitka, Chief	907.628.6126	rpitka@beavercouncil.org		
Village Corporation Beaver Kwit'chin Corporation				
Doreen Deaton, President	907.628.6126	doreendeatonbkc@gmail.com		
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		
CITY				
N.A.				

Contact Name and Affiliation	Phone	Email	Date	Time
BOROUGH OR OTHER LOCAL GOVERNMENT				
N.A.				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

**ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
GENERIC (STEVENS VILLAGE)**

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlrIDGE.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Stevens Village Council				
Margaret Matthew, Tribal Administrator	907.888.7414 907.478.7228	margaret.matthew@tananachiefs.org svs.ira.council@gmail.com		
Dinyea Corporation-Stevens Village ANCSA Corporation				
Randy Mayo, President	907.699.2128	randygmayo@gmail.com		
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		

Contact Name and Affiliation	Phone	Email	Date	Time
CITY				
N.A.				
BOROUGH OR OTHER LOCAL GOVERNMENT				
N.A.				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

**ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
GENERIC (RAMPART)**

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlrIDGE.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Rampart Tribal Council				
Margaret Moses, Tribal Administrator	907.358.3312	margaret.moses99767@gmail.com		
Baan-O-Yeel Kon Corporation-Rampart ANCSA Village Corporation				
Marjorie Merry, President	907.456.6529	boyk@mosquitonet.com		
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		
CITY				
N.A.				

Contact Name and Affiliation	Phone	Email	Date	Time
BOROUGH OR OTHER LOCAL GOVERNMENT				
N.A.				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

**ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
GENERIC (TANANA)**

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlridge.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Tanana Tribal Council				
Victor Joseph, Executive Director	907.366.7170	executivedirector@tananatribe.org		
Tozitna, Limited-Tanana ANCSA Village Corporation				
Nina Heyano, President	907.366.7255	president@tozitna.com manager@tozitna.com		
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		
CITY of Tanana				
Gloria George, Interim City Clerk	907.371.9320	clerk@cityoftanana.com		

Contact Name and Affiliation	Phone	Email	Date	Time
BOROUGH OR OTHER LOCAL GOVERNMENT				
N.A.				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM

DISCOVERY ALONG YUKON RIVER, OUTSIDE OF A COMMUNITY OR IN THE CANYON BYPASS SEGMENT

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
U.S. Bureau of Land Management				
Crystal Glassburn, Archaeologist, Central Yukon Field Office	907.474-2240	cglassburn@blm.gov		
U.S. Fish and Wildlife Service				
Jeremy Karchut, Regional Archaeologist/Historic Preservation Officer	907.786-3399	Jeremy.Karchut@fws.gov		
U.S. Army Corps of Engineers, Alaska District				
Janet Post, Chief, North Branch	907.753.5552	Janet.I.Post@usace.army.mil		
Owl Ridge Natural Resources Consultants, LLC				
Brooke Therrien, Senior Scientist	907.344.3448 907.759.3013	btherrien@owlridge.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Native Village of NAME HERE				
Village Corporation NAME HERE				
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		

Contact Name and Affiliation	Phone	Email	Date	Time
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		
CITY of CITYNAME HERE				
NAME, TITLE				
BOROUGH OR OTHER LOCAL GOVERNMENT				
Name, Title				
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

ALASKA FIBEROPTIC PROJECT CULTURAL RESOURCES NOTIFICATION FORM
DISCOVERY BETWEEN FAIRBANKS AND THE E.L. PATTON YUKON RIVER BRIDGE

Date and Time of Discovery: _____

Name of Person Reporting/Company/Mobile number: _____

Contact Name and Affiliation	Phone	Email	Date	Time
National Telecommunications and Information Administration (NTIA)				
Andy Bielakowski, Environmental Program Officer	202.657.7982	Andrew.Bielakowski@firstnet.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO)				
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		
Alaska Department of Natural Resources, Division of Mining, Land and Water				
Robert Sackinger, Natural Resource Specialist III	907.451.2720	bruce.sackinger@alaska.gov		
Alaska Department of Transportation and Public Facilities				
Kerri Martin, Regional Environmental Manager	907.451.5289	Kerri.martin@alaska.com		
DeployCom				
Doug Hudson, Project Manager	305.988.9904	Dhudson@deploycom.com		
Richard Stern, Cultural Resource Specialist	907.242.1847	ACRCstern8107@gmail.com		
Native Village of Minto				
Lori Baker, Chief	907.789.7112	labaker@hotmail.com tribaladministrator@villageofminto.org		
Village Corporation NAME HERE				
Doyon Corporation, Limited				
Allen Todd, General Counsel	907.459.2000	todda@doyon.com		
Molly Redilla, VP Lands	907.459.2039	redillam@doyon.com		
Tanana Chiefs Conference				
Bob Sattler, Archaeologist	907.452.8251 ext.3242	realty_dept@tananachiefs.org		
April Monroe, Realty Department	907.452.8521 ext. 3242	realty_dept@tananachiefs.org		

Contact Name and Affiliation	Phone	Email	Date	Time
City of Fairbanks				
John O'Brien, Environmental Analyst	907.459.1648	jobrien@fairbanks.us		
Fairbanks North Star Borough				
Melissa Kellner, Community Planning Deputy Director	907.459.1252	melissa.kellner@fnsb.gov		
Human Remains Contacts				
Alaska State Troopers, Missing Persons Clearinghouse 907.269.5038				
Lt. Paul Fussey	907.269.5682	paul.fussey@alaska.gov		
Malia Miller	907.269.5038	malia.miller@alaska.gov		
Alaska State Medical Examiner's Office 907.334.2200 (24/7)				
Dr. Gary Zientek, Chief Medical Examiner	907.334.2200	gary.zientek@alaska.gov		
Anne Waisanen, Operations Administrator	907.334.2202	ann.waisanen@alaska.gov		
Alaska Office of History and Archaeology/State Historic Preservation Office (SHPO) 907.269.8700				
Richard VanderHoek, State Archaeologist/Deputy SHPO	907.269.8728 907.269.8700	richard.vanderhoek@alaska.gov oha.permits@alaska.gov		
Health Analytics and Vital Records 907.465.5423 Fax 907.465.3423				

ATTACHMENT F
CONSULTATION EFFORTS

- Section 106 Invitation to Participate Letter (February 7, 2024)
- Webinar Information (April 17, 2024)
- Email submittal of the Draft PA/CRMP (April 18, 2024)
- Summary of follow up Outreach (May 6 through May 9, 2024)
- Reminder Email (May 20, 2024)
- PA Participation Table

From: [Brooke Therrien](#)
To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; [Head, Melissa M](#); jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.brace@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; boyk@mosqitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org; melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribe.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](#); [Amanda Pereira \(apereira@ntia.gov\)](#); TODDA@doyon.com; [Molly.Redilla \(redillam@doyon.com\)](mailto:Molly.Redilla (redillam@doyon.com)); [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#); [Jamie Marunde](#)
Subject: Alaska FiberOptic Project: NHPA Section 106 Consultation
Date: Wednesday, February 7, 2024 4:34:00 PM
Attachments: [Stakeholder ltr Alaska FOP signed.pdf](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is inviting you to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project). The project is proposing to provide broadband internet service to five currently underserved communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). We are submitting this letter to introduce the Project, and to formally invite your organization to participate. You will be notified when a draft of the PA is available for review.

Attached you will find a formal letter which includes a Project Location Map and a Distribution List. Within the letter there is a link to an online web mapper which displays the preliminary Area of Potential Effect. If you have questions or comments, please do not hesitate contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. Alternatively, you can reply to this email or contact me directly via phone at (907) 759-3013.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlriddenrc.com | www.owlriddenrc.com

[Confidentiality Notice](#)



February 7, 2024

Subject: Invitation to consult per Section 106 of the National Historic Preservation Act (NHPA) on the Alaska FiberOptic Project (Project) funded by a grant from the National Telecommunications and Information Administration's Tribal Broadband Connectivity Program.

To Whom It May Concern:

Doyon, Limited (Doyon), an Alaska Native Regional Corporation, proposes to construct and operate the Alaska FiberOptic Project (Project). The Project will utilize funding provided by a National Telecommunications and Information Administration (NTIA) grant from the Tribal Broadband Connectivity Program, to provide broadband access to a portion of the area within Doyon's Alaska Native Regional Corporation boundary that is underserved by broadband internet. Doyon proposes to provide broadband internet service to five communities along the Yukon River: Fort Yukon, Beaver, Stevens Village, Rampart, and Tanana. The Project would install approximately 468 miles of fiber optic cable (FOC) from a connection with an existing fiber optic network near Fairbanks, Alaska to the central interior region of the Yukon River (Figure 1).

The Project is federally funded and subject to consultation under Section 106 of the National Historic Preservation Act (NHPA), as amended. Through this consultation, NTIA, acting as a lead agency, is proposing to develop a project specific Programmatic Agreement (PA). The PA allows for a phased approach to complying with Section 106, pursuant to the implementing regulations found at 36 CFR § 800. Further, the PA establishes a collaborative process for the future identification, evaluation, mitigation, monitoring, and recovery of historic properties, consistent with Advisory Council on Historic Preservation (ACHP) regulations pursuant to Section 110(a)(2)(E) of the NHPA.

In accordance with Section 106 of the NHPA, NTIA is initiating consultation with agencies, Tribes, and other interested parties that have an interest or concern about any cultural resources, historic properties, or traditional cultural sites. We are submitting this letter to introduce the Project, and to formally invite your organization to participate.

Project Description

The Project is divided into two corridors: a terrestrial corridor which extends from Fairbanks to and includes the E.L. Patton Bridge crossing over the Yukon River; and a river corridor that begins at the point the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana. The river corridor includes all proposed activities within the river as well as an overland Canyon Bypass that avoids the Rampart Rapids.

The Project will be completed in two phases over 2024 and 2025. The majority of the FOC will be installed during 2024 and includes a portion of the terrestrial corridor, the river corridor between Beaver and Tanana, and the Canyon Bypass corridor. The FOC between Fort Yukon and Beaver, and remainder of the terrestrial corridor will be completed during the summer of 2025.

The terrestrial portion of the Project starts in Fairbanks and continues north to the crossing over the Yukon River, terminating on the north side of the E.L. Patton Bridge (132 miles). Installation of the FOC uses a variety of methods all located primarily within the existing highway right-of-way (ROW) managed by the Alaska Department of Transportation and Public Facilities (DOT&PF). The FOC will be strung on an existing pole line for the first 20 miles and will then transition below ground where clearing, vibratory plowing, and trenching will be used to directly bury the cable below the surface. Horizontal directional drilling (HDD) will be used, as necessary, at creek and roadway crossings.

The riverine portion of the Project starts where the FOC enters the Yukon River and extends upstream to Fort Yukon and downstream to Tanana (316 miles). All in-water work will be completed from a self-propelled, self-contained cable-lay barge supported by smaller support skiffs. A scratch plow will be used between Beaver and Tanana and a jet plow will be used between Fort Yukon and Beaver to bury the FOC within the riverbed.

Within each community, a beach manhole (BMH) and a communications shelter will be placed within the existing utility easement or other designated location. Once the FOC leaves the BMH, it will be strung on existing poles aboveground with minimal ground disturbance anticipated.

A Canyon Bypass is proposed between the communities of Rampart and Tanana to bypass the Rampart Rapids (20 miles). Conventional vibratory plowing will primarily be used to install the FOC in the Canyon Bypass corridor, and HDD will be used to cross under any streams along the alignment. A BMH will be placed at either end of the Canyon Bypass where the FOC transitions out of and back into the Yukon River.

Preliminary Area of Potential Effect (APE)

The Area of Potential Effect (APE) for the terrestrial portions of the Project is centered on the FOC installation alignment centerline with a 30-foot buffer either side of the alignment, 60 feet wide in total. The APE for riverine installation of FOC in the Yukon River is centered on the FOC burial in the bed of the river, with a 100-foot buffer either side of the centerline, 200 feet wide in total. The Project will utilize a variety of land statuses: federal, State of Alaska, Alaska Native Corporation, Tribal, and private lands. Due to the large geographic area of the proposed Project, an online web mapper has been developed to display the proposed APE. The mapper is available at the following link [ALASKA FIBEROPTIC PROJECT \(arcgis.com\)](https://arcgis.com).

Identification Efforts

Two desktop cultural resource literature reviews were conducted, one for the terrestrial portion and the other for the river portion:

- *The Alaska FiberOptic Project Fort Yukon to Tanana Cultural Resources Literature Review* (ACRC 2023)
- *Cultural Resources Literature Review and Recommendations* (Fairbanks – Yukon Fiber Route) (DOWL 2023)

These reports were submitted to the Alaska State Historic Preservation Office (SHPO) for review on January 15, 2024, and are available upon request.

Consultation Efforts

Consistent with 36 CFR § 800.2(c)(4), NTIA has authorized Owl Ridge Natural Resource Consultants, Inc. (Owl Ridge) to participate in Section 106 of NHPA consultation with stakeholders for the Project. As part of

February 7, 2024

Page 3

the consultation for the Project, NTIA, with support from Doyon and Owl Ridge, has begun developing a comprehensive list of potential stakeholders and preliminarily identifying their role in the development of the PA. During the development of the PA, consulting parties are designated as one of the following, in accordance with 36 CFR § 800.6(c):

- Signatory
- Invited Signatory
- Concurring Party

Attached to this letter is a preliminary list of entities and their designated role in the PA. This list will be updated pending any comments received.

Conclusion

Pursuant to ACHP's regulations implementing Section 106 of the NHPA, NTIA is providing you an opportunity to comment and invite participation in our Section 106 process via Programmatic Agreement (36 CFR § 800.14(b)(3)). We also request that you identify any additional parties not included in the distribution list below that should be contacted to determine if they are interested in the Alaska FiberOptic Project and would like to receive information about it.

Under Section 106, this Project is being evaluated for its potential to affect historic properties. In addition to consulting with SHPO, NTIA recognizes its responsibilities pursuant to Section 106 regarding consultation with Native Alaskan Tribes and organizations concerning properties of religious and/or cultural significance that could be affected by the undertaking. All information provided will be kept confidential and used only to avoid, minimize, or mitigate any adverse effects to historic properties. The PA in development will confirm the responsibilities of NTIA and other stakeholders and outline the procedures to address concerns about historic properties and properties of religious and/or cultural significance.

Communications may be emailed to Andrew.Bielakowski@firstnet.gov. If mail is your preferred method of communication, kindly send a copy to Owl Ridge Natural Resource Consultants, Inc., 4060 B Street, Suite 200, Anchorage, Alaska 99503, Attention: Brooke Therrien (btherrien@owlridgenrc.com). Owl Ridge is working under contract to Doyon to prepare the required environmental documents and permits for the Project. Please do not hesitate to contact me if you have any questions or concerns about the Project.

Best regards,

ANDREW
BIELAKOWSKI

Digitally signed by
ANDREW BIELAKOWSKI
Date: 2024.02.06
18:08:43 -06'00'

Andrew Bielakowski

Andrew.Bielakowski@firstnet.gov
Environmental Program Officer
Office of Internet Connectivity and Growth
National Telecommunications and Information Administration
202-657-7982 mobile

Attachments:

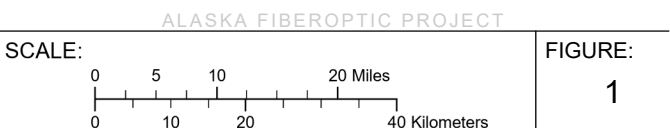
Figure 1. Alaska FiberOptic Project Location
Distribution List



- | | |
|--------------------------------|-----------------------------|
| □ Community | Alignment (Install Type) |
| ■ Connected Community | Scratch Plow |
| ▬ Parks, Preserves and Refuges | Canyon Bypass (Terrestrial) |
| ▬ Highway | Jet Plow |
| | Terrestrial |



ALASKA FIBEROPTIC PROJECT
PROJECT LOCATION MAP



Distribution List

State and Federal Agencies (9)	
Advisory Council on Historic Preservation (ACHP)	Signatory
Alaska Department of Fish and Game (ADFG)	Invited Signatory
Alaska Department of Natural Resources (DNR)	Invited Signatory
Alaska Department of Transportation and Public Facilities (DOT&PF)	Invited Signatory
Alaska State Historic Preservation Officer (SHPO)	Signatory
Bureau of Land Management (BLM)	Signatory
National Telecommunications and Information Administration (NTIA)	Signatory
U.S. Army Corps of Engineers (USACE)	Signatory
U.S. Fish & Wildlife Service (USFWS)	Invited Signatory
Federally Recognized Tribes (6)	
Beaver Village Council	Concurring Party
Gwitchyaa Zhee Gwich'in Tribal Government (GZGTG)	Concurring Party
Native Village of Minto	Concurring Party
Rampart Tribal Council	Concurring Party
Stevens Village Council	Concurring Party
Tanana Tribal Council	Concurring Party
ANCSA Corporations and Non-Profit Tribal Corporations (10)	
Baan-O-Yeel Kon Corporation (BOYK)	Concurring Party
Beaver Kwitich'in Corporation	Concurring Party
Council of Athabascan Tribal Governments (CATG)	Concurring Party
Dinyea Corporation	Concurring Party
Doyon, Limited (Doyon)	Signatory
Fairbanks Native Association (FNA)	Concurring Party
Gwitchyaa Zhee Corporation	Concurring Party
Seth-De-Ya-Ah Corporation	Concurring Party
Tanana Chiefs Conference (TCC)	Concurring Party
Tozitna, Limited	Concurring Party
City and Borough Governments (4)	
City of Fairbanks	Concurring Party
City of Fort Yukon	Concurring Party
City of Tanana	Concurring Party
Fairbanks North Star Borough	Concurring Party
Other (3)	
DeployCom	Invited Signatory
University of Alaska Museum of the North (UAMN)	Concurring Party
Yukon-Tanana Historical Society	Concurring Party

AGENDA



- Introductions
- Project Update
- Programmatic Agreement Consultation
- Q&A



1


PARTNERS






2

OUR GOAL

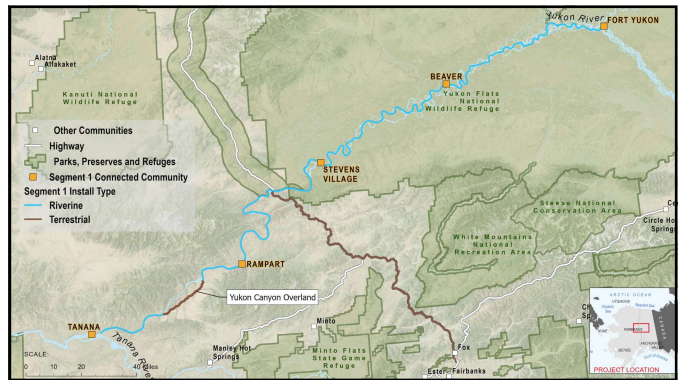


- Provide reliable, affordable, high-speed broadband in

- Fort Yukon
- Beaver
- Stevens Village
- Rampart
- Tanana




3




4

TECHNOLOGY




- Fiber optic cable, delivering up to Gigabit speeds
- Fiber to the home, school, healthcare clinics and all major facilities
- Most reliable and fastest technology available



5

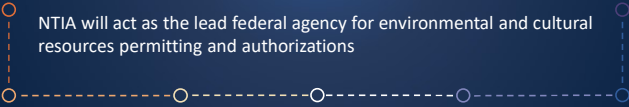
FUNDING



National Telecommunications and Information Administration (NTIA)
Tribal Broadband Connectivity Program grant


Funding provided by the Infrastructure, Investment and Jobs Act passed by Congress in 2021

- NTIA will act as the lead federal agency for environmental and cultural resources permitting and authorizations



6


AFFORDABILITY



- Alaska Communications will offer Home Internet at the same prices offered in Anchorage and Fairbanks
- Schools and healthcare clinics can expect reduced rates

7

ENVIRONMENTAL REVIEW



- Project will undergo standard environmental and permitting process
- Major permits and authorization include:
 - U.S. Army Corps of Engineers in accordance with Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act
 - Alaska Office of History and Archaeology – Consultation under the National Historic Preservation Act (NHPA)
 - Bureau of Land Management – Right of Way Authorization
 - National Marine Fisheries Service – Consultation for Essential Fish Habitat
 - Alaska Department of Natural Resources – Utility Easement
 - Alaska Department of Transportation & Public Facilities – Major Utility Permit
 - Alaska Department of Fish and Game – Fish Habitat Permit
- Fiber will be installed in the middle, deepest part of the river, at the bottom, away from the banks

8


PROGRAMMATIC AGREEMENT



- Per NHPA, NTIA is required to identify historic properties and assess potential impacts from the project.
- Due to timing and seasonality constraints, Doyon is unable to fully survey the project route prior to final approval.
- A Programmatic Agreement (PA) commits Doyon to completing any necessary cultural resources analyses prior to construction
- The PA is drafted and signed in consultation with stakeholders (federal and state agencies and Alaska Native groups) to address any concerns and complete the NHPA process

9


PA PROCESS



- Draft PA – In Progress
 - 30-day review period
 - Comments will be reviewed and addressed
- Final PA is drafted and sent to participating stakeholders
- Signatures are collected and requirements of the PA implemented

10


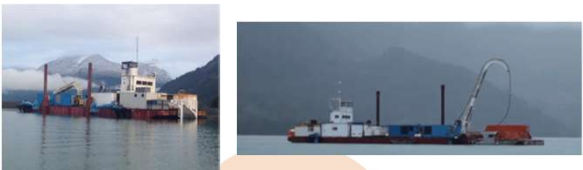
PROJECT SPECIFIC PA HIGHLIGHTS



- On the ground archaeology survey requirements
- Development of a Cultural Resource Management Plan
- Notification process to Tribes within 200 miles if there is an inadvertent discovery of cultural resources
- Cultural Resource Awareness Training for workers
- Notification forms to use if anything is found

11

RIVER INSTALLATION

12


SHORE LANDING





- Concrete beach manhole
- 4 feet x 4 feet
- Directional drill from riverbed to shore

13

ICE JAMS




- Coordinating with USGS for data and ice forecast
- Reviewed U.S. Army Corps of Engineers data
- Conducted Local/Traditional Knowledge interviews
- Comfortable with the hazard analysis



14


TIMELINE




2023	Federal and State permitting began Field planning and community meetings
2024	Final permits expected Ground construction from Fox to Yukon River Ground construction in your community Home device installation
2025	River construction and cable landings in each community Home installation Service available


15

HOME DEVICE INSTALLATION






Outside Home Mount
6.5 x 10"



Inside Home Mount
4 x 3"

16

HOME INSTALLATION



- Installation in 2024 FREE, paid for by grant
- Installation after 2024, paid by homeowner
- No obligation to purchase service
- Just like getting an electric meter, you sign up for service, then pay
- Service available end of 2025, after river install

17

JOB



2024

- Laundry support
- Brush clearing and tree trimmers
- Cooks and food preparation

2025

- Trucks and drivers to transport supplies from airport to river
- Water taxis to transport installation crews between vessels
- Small watercrafts and captains to transport fuel to install vessels

18

PROJECT TEAM



- NTIA – Federal Agency
- Doyon, Limited – Grant Recipient
- DeployCom – Construction Contractor
- Alaska Communications – Service Provider and Operator
- Owl Ridge – Permitting Support



19

WEBSITE




www.AKFiberOpticProject.com




20

SIGN UP




- Paper Form with Location/Address
- Sign Up Online




21

COMMUNITY VISITS



- Timing for 2024 in-person community meetings




22




THANK YOU!



23



SUPPLEMENTAL INFORMATION



24

SALMON-SPECIFIC CONSIDERATIONS

ALASKA FIBEROPTIC PROJECT

- Fiber optic cables do NOT emit any electromagnetic fields (EMF)
 - Nor do they emit heat or noise during operation

25

SALMON-SPECIFIC CONSIDERATIONS

ALASKA FIBEROPTIC PROJECT

- Salmon spawning migration does not typically occur mid-channel where vessel traffic during installation will be the greatest
- Salmon tend to use slower current areas along riverbanks and at variable depths for out-migration and spawning migrations

26

SALMON-SPECIFIC CONSIDERATIONS

ALASKA FIBEROPTIC PROJECT

- The fiber optic cable will be buried in the riverbed using a jet or scratch plow.
 - Trench will be 6 to 12 inches wide
 - Temporarily fluidizes riverbed
 - Trench rapidly fills in once plow passes

27

CURRENT HYPOTHESIZED DRIVERS OF YUKON SALMON DECLINE

ALASKA FIBEROPTIC PROJECT

- OCEANIC STAGE**
 - Changing ocean climate
 - Poor nutrition
 - Competition from hatchery fish
 - Bycatch in other fisheries
- SPAWNING STAGE**
 - Disease
 - Temperature Stress
 - Poor escapement quality
- EMBRYO STAGE**
 - Fewer eggs-in-gravel than estimated
 - Poor egg quality from parental stress
- EARLY LIFE STAGES**
 - Mortality from predation
- OUTMIGRATION STAGE**
 - Changing freshwater environment (flow, breakup, and temperature)
 - Poor condition
 - Poor nutrition

28

From: [Brooke Therrien](#)
To: [gbeyersd@blm.gov](#); [sara_boario@fws.gov](#); [cglassburn@blm.gov](#); [Head, Melissa M](#); [jimmy_fox@fws.gov](#); [Ryan.H.Winn@usace.army.mil](#); [Carolyn.H.Farmer@usace.army.mil](#); [judy.bittner@alaska.gov](#); [mckenzie.herring@alaska.gov](#); [douglas.vincent-lang@alaska.gov](#); [audra.braser@alaska.gov](#); [john.boyle@alaska.gov](#); [robert.sackinger@alaska.gov](#); [dot.commissioner@alaska.gov](#); [Martin, Kerri L \(DOT\)](#); [boyk@mosquitonet.com](#); [doreendeatonbkc@gmail.com](#); [randygmayo@gmail.com](#); [josh@gzcorporation.org](#); [cameron@sethcorporation.com](#); [president@tozitna.com](#); [manager@tozitna.com](#); [rpitka@beavercouncil.org](#); [melanie.herbert@fortyukon.org](#); [labaker@hotmail.com](#); [tribaladministrator@villageofminto.org](#); [margaret.moses99767@gmail.com](#); [margaret.matthew@tananachiefs.org](#); [svs.ira.council@gmail.com](#); [executivedirector@tananatribe.org](#); [dorothea.adams@catg.org](#); [mayor@fairbanks.us](#); [citymanager@fortyukon.us](#); [charliecampbell6060@gmail.com](#); [melissa.kellner@fnsb.gov](#); [realty_dept@tananachiefs.org](#); [sqinnis@fairbanksnative.org](#); [jreuther@alaska.edu](#); [tyhs@alaska.net](#); [Karchut, Jeremy M](#); [Annie Silas](#); [clerk@cityoftanana.com](#); [TA@villageofminto.org](#); [slwilson@blm.gov](#); [whedman@blm.gov](#); [thammond@blm.gov](#); [sringer@blm.gov](#)
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](#); [Amanda Pereira \(apereira@ntia.gov\)](#); [TODDA@doyon.com](#); [Molly Redilla \(redillam@doyon.com\)](#); [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#)
Subject: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Plan
Date: Thursday, April 18, 2024 11:36:00 AM
Attachments: [AKFOC Memo PA Summary \(DEP004-24-010F0\).pdf](#)
[image001.png](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is providing you with a link to the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

 [Draft PA and CRMP - Public Review](#)

On February 7, 2024, the NTIA initiated consultation with federal and state agencies, Tribes, and other interested parties that may have an interest or concern about any cultural resources, historic properties, or traditional cultural sites within the project area. Once you have reviewed the draft PA and CRMP please reply to this email by either:

- Advising that you want to participate in the development of the PA/CRMP.
- Advising that you decline to participate in the development of the PA/CRMP.

A brief memorandum summarizing comments received to date and the PA/CRMP review process is attached to this email. The link above contains a compiled PDF of the PA, CRMP, and other supporting documents. Word versions of the PA and CRMP have also been included for ease of editing and providing comments. Please use track changes and if providing comments please reply by **May 18, 2024**. A link from OneDrive has also been sent directly to you. In some cases, you may have to first access the link via that email prior to the link above working.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at btherrien@owlriddenrc.com.

Sincerely,

Brooke Therrien | Senior Scientist

Owl Ridge Natural Resource Consultants, Inc.

4060 B Street, Suite 200 | Anchorage, Alaska 99503

Main 907.344.3448 | Direct 907.759.3013

btherrien@owlrigenrc.com | www.owlrigenrc.com

[Confidentiality Notice](#)

Date	Agency	POC	Number	Outreach	Notes
May 6, 2024	BLM	Crystal Glassburn	(907) 474-2240	Voicemail	Provided comments on May 16, 2024
May 6, 2024	USFWS	Jeremy Karchut		Email	Declined via email
May 6, 2024	SHPO	McKenzie Herring	(907) 269-8726	Verbal Discussion	Reviewing documents this week.
May 6, 2024	ADF&G	Audra Brase	(907) 459-7282	Verbal Discussion	Audra replied May 10, 2024, waiting comments from other departments.
May 6, 2024	DOT	Kerri Martin	(907) 451-5289	Voicemail	Follow up email sent.
May 6, 2024	City of Fairbanks	John Obrien	(907) 459-6747	Voicemail/ email	Follow up email sent.
May 7, 2024	FNSB	Melissa Kellner	(907) 459-1252	Voicemail	Follow up email sent.
May 7, 2024	TCC	Bob Sattler	(907) 452-8251 ext. 3242	Verbal Discussion w/ Admin	Spoke with administration. Message sent to Bob. Phone call with Bob on May 9, 2024. Confirmed receipt and is reviewing.
May 7, 2024	CATG	Dorothea Adams	(907) 662-7511	Voicemail	Follow up email sent.
May 7, 2024	FNA	Steve Ginnis	(907) 452-1648	Voicemail	Voicemail left with Chaylene (last name?). She is Steve's Executive coordinator.
May 7, 2024	UAMN	Josh Reuther	(907) 4746945	Voicemail	Follow up email sent.
May 7, 2024	Yukon-Tanana Historical Society	Ron Inouye	(907) 456-8947	Verbal Discussion	Spoke with Elizabeth Cook (Administrator). She is forwarding the information today.
May 7, 2024	BOYK	Marjorie Merry	(907) 456-6529	Phone number inactive.	Follow up email sent.
May 7, 2024	Beaver Corp	Doreen Deaton	(907) 628-6126	Verbal Discussion w/ Admin	Busy signal. Main office. Doreen direct number is (907) 388-9903. Voicemail left at that number.
May 7, 2024	Dinyea Corp (Stevens Village)	Randy Mayo	(907) 699-2128	Verbal Discussion w/ Admin	Email resent. Preliminary confirmation that they decline. Sent declining email on May 7, 2024.

May 7, 2024	GZ Corp	Josh Nadell		Verbal Discussion w/ Admin	Advised to contact via email. Email resent to Josh. Sent declining email on May 14, 2024.
May 8, 2024	Seth-De-Ya-Ah Corp	Annie Silas	(907) 457-1061	Verbal Discussion with Annie	Sent declining email.
May 8, 2024	Tozitna, Limited	Nina Heyano	(907) 366-7255	Phone/ no answer	Follow up email sent.
May 13, 2024	Beaver Village Council	Rhona Pitka	(907) 628-6126	Phone/ no answer	Will participate
May 8, 2024	GZGTG	Melanie Herbert	(907) 662-2581	Voicemail	Follow up email sent.
May 8, 2024	Native Village of Minto		(907) 789-7112	Phone number inactive.	Follow up email sent.
May 8, 2024	Rampart Tribal Council	Margaret Moses	(907) 358-3312	Verbal Discussion w/ Admin	Out of town until May 14, 2024, advised to send another email. Email sent May 8, 2024.
May 8, 2024	Stevens Village Council	Margaret Mathews	(907) 888-7414 (907) 478-7228	Voicemail/busy signal	Follow up email sent.
May 8, 2024	Tanana Tribal Council	Victor Joseph	(907) 366-7170	Verbal Discussion with Gladis	Email forwarded to Gladys on May 8, 2024.
May 8, 2024	USACE	Carolyn Farmer	(907)	Verbal Discussion with Carolyn	Waiting for Comments from SHPO
May 9, 2024	City of Fort Yukon		(907) 662-2479	Verbal Discussion with Admin	Verbal message left with admin
May 9, 2024	City of Tanana	Admin	(907) 371-9320	Verbal Discussion with Admin	Confirmed receipt and will review and reply via email.
May 16, 2024	DNR	Bruce Sackinger	(907)	Email sent	Bruce has been on vacation until May 13, 2024.

From: [Brooke Therrien](#)
To: [Brase, Audra L \(DFG\)](#); [Vincent-Lang, Douglas S \(DFG\)](#); [Sackinger, Robert B \(DNR\)](#); john.boyle@alaska.gov; [Judy Evans](#); [Doreen Deaton](#); [Nina Heyano \(president@tozitna.com\)](mailto:Nina.Heyano@tozitna.com); manager@tozitna.com; Melanie.Herbert@FortYukon.org; tribaladministrator@villageofminto.org; [Peter Anderson](#); margaret.moses99767; [Margaret Matthew](#); executivedirector; executiveassistant@tanana.tribe.org; mayor@fairbanks.us; jobrien@fairbanks.us; citymanager@fortyukon.us; clerk@cityoftanana.com; [Charles Campbell](#); melissa.kellner@fnsb.gov; realty_dept@tanana.chiefs.org; bob.sattler@tanana.chiefs.org; dorothea.adams@catg.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; [Tanana-Yukon Historical Society](#)
Cc: [Andrew Bielakowski \(Andrew.Bielakowski@firstnet.gov\)](mailto:Andrew.Bielakowski@firstnet.gov); [Amanda Pereira \(apereira@ntia.gov\)](mailto:Amanda.Pereira@ntia.gov); TODDA@doyon.com; [Angela Ludwick](#); [Doug Hudson](#); [Glenn Ruckhaus](#); [Paul Cartier](#)
Subject: FW: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Plan
Date: Monday, May 20, 2024 10:14:00 AM
Attachments: [AKFOC Memo PA Summary \(DEP004-24-010F0\).pdf](#)
[image001.png](#)

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is following up with you regarding the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

Copies of this information are linked in the email below, dated April 18, 2024. The NTIA is beginning to review comments received and preparing to develop final copies of the PA and CRMP. If you would like to participate, please let us know by **May 24, 2024**. If we do not hear from you by that date, we will assume that your agency is declining to participate.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at btherrien@owlridgenrc.com.

Sincerely,

Brooke Therrien | Senior Scientist
Owl Ridge Natural Resource Consultants, Inc.
Main 907.344.3448 | Direct 907.759.3013

From: Brooke Therrien
Sent: Thursday, April 18, 2024 11:37 AM
To: gbeyersd@blm.gov; sara_boario@fws.gov; cglassburn@blm.gov; Head, [Melissa Mhead@blm.gov](mailto:Melissa.Mhead@blm.gov); jimmy_fox@fws.gov; Ryan.H.Winn@usace.army.mil; Carolyn.H.Farmer@usace.army.mil; judy.bittner@alaska.gov; mckenzie.herring@alaska.gov; douglas.vincent-lang@alaska.gov; audra.braser@alaska.gov; john.boyle@alaska.gov; robert.sackinger@alaska.gov; dot.commissioner@alaska.gov; Martin, Kerri L (DOT) kerri.martin@alaska.gov; boyk@mosquitonet.com; doreendeatonbkc@gmail.com; randygmayo@gmail.com; josh@gzcorporation.org; cameron@sethcorporation.com; president@tozitna.com; manager@tozitna.com; rpitka@beavercouncil.org;

melanie.herbert@fortyukon.org; labaker@hotmail.com; tribaladministrator@villageofminto.org; margaret.moses99767@gmail.com; margaret.matthew@tananachiefs.org; svs.ira.council@gmail.com; executivedirector@tananatribe.org; dorothea.adams@catg.org; mayor@fairbanks.us; citymanager@fortyukon.us; charliecampbell6060@gmail.com; melissa.kellner@fnsb.gov; realty_dept@tananachiefs.org; sginnis@fairbanksnative.org; jreuther@alaska.edu; tyhs@alaska.net; Karchut, Jeremy M <jeremy_karchut@fws.gov>; Annie Silas <annie@sethcorporation.com>; clerk@cityoftanana.com; TA@villageofminto.org; slwilson@blm.gov; whedman@blm.gov; thammond@blm.gov; sringer@blm.gov
Cc: Andrew Bielakowski (Andrew.Bielakowski@firstnet.gov) <Andrew.Bielakowski@firstnet.gov>; Amanda Pereira (apereira@ntia.gov) <apereira@ntia.gov>; TODDA@doyon.com; Molly Redilla (redillam@doyon.com) <redillam@doyon.com>; Angela Ludwick <ludwicka@doyon.com>; Doug Hudson <Dhudson@deploycom.com>; Glenn Ruckhaus <gruckhaus@owlridgenrc.com>; Paul Cartier <pcartier@owlridgenrc.com>

Subject: Alaska FiberOptic Project: Programmatic Agreement and Cultural Resource Management Pan

Hello,

On behalf of the National Telecommunication and Information Administration (NTIA), Owl Ridge Natural Resource Consultants, Inc., is providing you with a link to the draft Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Alaska FiberOptic Project (Project). The PA and CRMP are being developed in accordance with Section 106 of the National Historic Preservation Act.

 [Draft PA and CRMP - Public Review](#)

On February 7, 2024, the NTIA initiated consultation with federal and state agencies, Tribes, and other interested parties that may have an interest or concern about any cultural resources, historic properties, or traditional cultural sites within the project area. Once you have reviewed the draft PA and CRMP please reply to this email by either:

- Advising that you want to participate in the development of the PA/CRMP.
- Advising that you decline to participate in the development of the PA/CRMP.

A brief memorandum summarizing comments received to date and the PA/CRMP review process is attached to this email. The link above contains a compiled PDF of the PA, CRMP, and other supporting documents. Word versions of the PA and CRMP have also been included for ease of editing and providing comments. Please use track changes and if providing comments please reply by **May 18, 2024**. A link from OneDrive has also been sent directly to you. In some cases, you may have to first access the link via that email prior to the link above working.

If you have additional questions or comments, please do not hesitate to contact Andrew Bielakowski, with the NTIA, via phone at (202) 657-7982, or via email at Andrew.Bielakowski@firstnet.gov. You may also contact me directly with questions, comments, or if you have an issue with accessing the document via phone at (907) 759-3013 or by email at

Programmatic Agreement Participation/Declination Summary of Consulting Parties

PARTICIPATING ENTITIES	DECLINED TO PARTICIPATE	NO RESPONSE*
National Telecommunications and Information Administration Alaska State Historic Preservation Office Bureau of Land Management U.S. Army Corps of Engineers Doyon, Limited DeployCom Beaver Traditional Council	Advisory Council on Historic Preservation U.S. Fish and Wildlife Service Alaska Department of Transportation and Public Facilities Dinyea Corporation Gwichyaa Zhee Corporation Seth-De-Ya-Ah Corporation	Alaska Department of Fish and Game Alaska Department of Natural Resources Baan-O-Yeel Kon Corporation Beaver Kwit'chin Corporation Tozitna, Limited Gwichyaa Zhee Gwich'in Tribal Government Native Village of Minto Rampart Tribal Council Stevens Village Council Tanana Tribal Council City of Fairbanks City of Fort Yukon City of Tanana Fairbanks North Star Borough Tanana Chiefs Conference Council of Athabascan Tribal Governments Fairbanks Native Association University of Alaska Museum of the North Yukon-Tanana Historical Society

* Entities that did not response were contacted multiple times via phone and email.

ATTACHMENT G
PA DISTRIBUTION LIST

Distribution List

State and Federal Agencies (9)	
Advisory Council on Historic Preservation (ACHP)	Signatory
Alaska Department of Fish and Game (ADFG)	Invited Signatory
Alaska Department of Natural Resources (DNR)	Invited Signatory
Alaska Department of Transportation and Public Facilities (DOT&PF)	Invited Signatory
Alaska State Historic Preservation Officer (SHPO)	Signatory
Bureau of Land Management (BLM)	Signatory
National Telecommunications and Information Administration (NTIA)	Signatory
U.S. Army Corps of Engineers (USACE)	Signatory
U.S. Fish & Wildlife Service (USFWS)	Invited Signatory
Federally Recognized Tribes (6)	
Beaver Village Council	Concurring Party
Gwitchyaa Zhee Gwich'in Tribal Government (GZGTG)	Concurring Party
Native Village of Minto	Concurring Party
Rampart Tribal Council	Concurring Party
Stevens Village Council	Concurring Party
Tanana Tribal Council	Concurring Party
ANCSA Corporations and Non-Profit Tribal Corporations (10)	
Baan-O-Yeel Kon Corporation (BOYK)	Concurring Party
Beaver Kwitich'in Corporation	Concurring Party
Council of Athabascan Tribal Governments (CATG)	Concurring Party
Dinyea Corporation	Concurring Party
Doyon, Limited (Doyon)	Signatory
Fairbanks Native Association (FNA)	Concurring Party
Gwitchyaa Zhee Corporation	Concurring Party
Seth-De-Ya-Ah Corporation	Concurring Party
Tanana Chiefs Conference (TCC)	Concurring Party
Tozitna, Limited	Concurring Party
City and Borough Governments (4)	
City of Fairbanks	Concurring Party
City of Fort Yukon	Concurring Party
City of Tanana	Concurring Party
Fairbanks North Star Borough	Concurring Party
Other (3)	
DeployCom	Invited Signatory
University of Alaska Museum of the North (UAMN)	Concurring Party
Yukon-Tanana Historical Society	Concurring Party

**ATTACHMENT H
AMENDMENT AND ADDENDUM LOG**

Version #	Date	Section	Summary of Changes