I. Resource Definition

A. Cultural

Cultural resources are any prehistoric or historic district, site or building, structure, or object considered important to a culture, subculture, or community for scientific, traditional, religious or other purposes. Cultural resources include archeological resources (both prehistoric and historic), historic architectural resources, and traditional cultural resources. Only significant cultural resources are considered for potential adverse impacts from an action. Significant cultural resources are those eligible for inclusion in the National Register of Historic Places (NRHP) or identified as important to traditional groups, as outlined in the *American Indian Religious Freedom Act* (AIRFA), the *Native American Graves Protection and Repatriation Act* (NAGPRA), and Executive Order (E.O.) 13007 Indian Sacred Sites. For a cultural resource to be considered eligible for the NRHP, it must possess integrity of location, design, setting, materials, workmanship, feeling, or association, and it must meet one or more of the following criteria (36 Code of Federal Regulations [CFR] 60:4):

- a) association with events that have made a significant contribution to the broad patterns of our history; or
- b) association with the lives or persons significant in our past; or
- distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) have yielded, or may be likely to yield, information important in prehistory or history.

On November 21, 1999, the Department of Defense (DoD) promulgated its *American Indian and Alaska Native Policy*, which emphasizes the importance of respecting and consulting with tribal governments on a government-to-government basis. The policy requires an assessment, through consultation, of the effect of proposed DoD actions that may have the potential to significantly affect protected tribal resources, tribal rights, and Indian and Alaska Native lands, before decisions are made by the services.

Significant traditional cultural resources can be identified by Native Americans or other cultural groups, and may also be eligible for the NRHP. The Alaska National Interest Lands Conservation Act (ANILCA) of 1980 recognized the importance of subsistence use of fish, wildlife, and other consumptive resources and provided for the continued opportunity for customary and traditional uses of fish and wildlife resources on public lands by residents of rural Alaska (Air Force 1995). ANILCA defined subsistence use as the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making

and selling of handicraft articles out of non-edible by-products of fish and wildlife resources taken for personal or family consumption; and for customary trade.

Many small communities in Alaska are wholly or largely dependent on subsistence use of renewable resources. Subsistence use can be the principal means of support for families whose members do not participate in a wage-oriented economy. Subsistence activities may also informally transmit a culture from generation to generation (Air Force 1995). The social organization of rural Alaska includes kinship networks that organize much of the community's subsistence production, distribution, and consumption; informal systems of respect and authority; strong extended families and stratification between families focused on success at subsistence endeavors; and access to subsistence technology (Air Force 1995).

B. Visual

Visual resources are usually defined as areas with unique features that are a result of the combined characteristics of the natural and human aspects of land use. Examples of the natural aspects of land include wild and scenic rivers, topography, and geologic landforms. Examples of human aspects of land use include scenic highways and historic districts. The assessment of visual and aesthetic value involves a characterization of visual features in the study area.

II. Regulatory Setting

A. Cultural

A complex and extensive legal framework mandates consideration of cultural resources in project planning. These laws and regulations also stipulate a process for compliance, define the responsibilities of the agency managing the resources, and prescribe the relationship among other involved agencies or governmental entities. Laws and regulations relevant to the treatment of cultural resources include the following:

- National Historic Preservation Act of 1966NHPA), as amended 1992
- Archaeological Resources Protection Act (ARPA)
- American Indian Religious Freedom Act of 1978 (AIRFA)
- Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)
- E.O. 13007 Indian Sacred Sites
- E.O. 13084 Consultation and Coordination with Indian Tribal Governments.
- DoD American Indian and Alaska Native Policy (November 21, 1999)
- Air Force Instruction (AFI) 32-7065 Cultural Resource Management

These laws and regulations provide specific measures for identifying, evaluating, and preventing the deterioration and destruction of significant cultural resources on federal lands or as a result of federal undertakings.

III. Methodology

A. Cultural

Analysis of potential impacts to cultural resources considers both direct and indirect impacts. Direct impacts may occur by physically altering, damaging, or destroying all or part of a resource; altering characteristics of the surrounding environment that contribute to the resource's significance; introducing visual or audible elements that are out of character with the property or alter its setting; or neglecting a resource to the extent that it deteriorates or is destroyed. Direct impacts are assessed by identifying the types and locations of proposed activity and determining the location of cultural resources that could be affected. Indirect impacts result primarily from the effects of project-induced population increases and the need for construction to accommodate population growth. Construction activities and the subsequent use of the facilities can impact cultural resources.

Impacts to traditional resources under airspace can result from noise and visual effects of aircraft overflights on rituals and ceremonies, and on wildlife resources. In addition, aircraft overflights can increase the level of effort required to harvest subsistence resources and increase the likelihood of reduced harvest levels during the critical subsistence season.

Archaeological and historic architectural resources at the bases were characterized using existing survey and analysis information from installation cultural resource management plans (CRMPs), historic preservation plans (HPPS), archaeological survey reports, historic buildings survey reports, local histories, and the records of the NRHP and NHL. These documents provided information on known locations of significant resources and identified areas with a high potential for unrecorded cultural resources. Archaeological and historic architectural resources under airspace, which were unlikely to be affected by aircraft overflights, were characterized using the records of the National Register of Historic Places (NRHP) and National Historic Landmarks (NHL). Relevant State Historic Preservation Offices (SHPO) were also contacted regarding potential cultural resource concerns for the proposed action.

The potential for traditional resources at the bases was identified using CRMPs, HPPs, and information provided by installation cultural resource management staff. The potential for traditional resources under airspace was identified using Bureau of Indian Affairs (BIA) maps of reservations and Indian lands (BIA 1998), the BIA list of federally recognized tribes, regional histories, and documentation on Alaska Native villages compiled by the Alaska Department of Community and Economic Development (DCED). In addition, potentially interested Native American or Alaska Native groups were contacted to request information on potential concerns about the proposed action.

B. Visual

Analysis of visual impacts involves determining the visual sensitivity of an area, taking into account social considerations. Social considerations include the public's value placed on the resource, public awareness of the area, and general community concern for visual resources. These social considerations are addressed as visual sensitivity, and are defined as the degree of public interest in a visual resource and concern over adverse changes in the quality of that resource. As aircraft are common around and off the base locations, a new aircraft of approximately the same size and shape would not present a change. Therefore, analysis focuses on construction-related impacts to the visual resources of the base.