## THE ALASKA HERITAGE RESOURCES SURVEY - POLICIES AND GUIDELINES AHRS DATA LIMITATIONS - MAY 2024

### Introduction

The Alaska Heritage Resources Survey (AHRS) is a collection of reported cultural resources, including archaeological sites, buildings, structures, objects, or locations, etc. from prehistoric to modern, and some paleontological sites, from throughout the State of Alaska. The AHRS is maintained by the Alaska Department of Natural Resources, Office of History and Archaeology (OHA) staff and the electronic database portion of the AHRS is the AHRSPortal.

### **AHRS Access**

AHRS access, including access to the online AHRSPortal is generally for qualified cultural resources individuals that meet or exceed the qualifications discussed by the United States Department of the Interior (DOI), Secretary of the Interior (SOI) standards (<a href="https://www.doi.gov/pam/asset-management/historic-preservation/PQS">https://www.doi.gov/pam/asset-management/historic-preservation/PQS</a>) are provided access to AHRSPortal data. Cultural resources professionals use AHRS data in conjunction with other research, environmental information, or possibly fieldwork, which allows them to properly critique the information. In other words, qualified cultural resources staff usually mitigate AHRSPortal issues during the Section 106 process for a project.

OHA provides AHRSPortal access to non-SOI qualified government employees for planning purposes only. The intent is that government employees are informed early on in a project planning phase if previously inventoried cultural resources may be affected by an upcoming project. This may be useful for anticipating cultural resources work for the project further on as part of the Section 106 process.

Reviewing AHRSPortal information should not itself be considered a comprehensive cultural resources literature review. In other words, AHRS information is not intended for use as a **stand-alone** cultural resources information source to make Section 106 or NEPA determinations. There are several inherent limitations to AHRS information. Using AHRSPortal information outside or in place of the Section 106 process may be inadvertently harmful to recorded and potentially unrecorded cultural resources of local, state, and/or national significance. OHA highly recommends consulting a cultural resource professional to conduct cultural resources investigations for all projects.

#### **AHRSPortal Data Limitations**

There are several AHRS data issues that all users must keep in mind when using location and attribute data from the AHRSPortal (or additionally, information from AHRS sources at OHA). The following AHRSPortal Data Limitations list consist of significant issues that AHRS Users should be considered when using AHRSPortal information:

1. Less than five percent of the State of Alaska has been systematically surveyed for cultural resources. If an area of interest on the AHRSPortal Mapper does not contain previously inventoried cultural resources, the potential is high that the area has not been previously surveyed for cultural resources. This requires more research, not less. The lack of information on the AHRSPortal cannot be the only source used to justify a "No Historic Properties Affected" determinations for any project that may affect cultural resources.

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- 2. The AHRSPortal may not contain information on areas considered culturally sensitive by local communities or groups. This may be because those areas have not been reported to OHA or because the types of sensitive areas may not be easily defined within the National Register Program, used by OHA and the AHRS as guidelines for AHRS information. Gathering this type of information from local communities will require outreach and consultation by project proponents, usually as part of Section 106 process. There are other resources, such as native place names, that may indicate cultural resources or culturally sensitive areas in or near a location. These types of resources should be considered relative to any project that potentially could affect significant cultural resources and require research outside of the AHRSPortal.
- 3. Cultural resources investigations are snapshots in time and the information on resources within an area of interest may be outdated. Previously inventoried cultural resources noted within a permit or project area require that the site information and any previous determinations to be reassessed relative to the current project. What was initially recorded, and its importance, may have changed over time. For example, a World War II cultural resource inventoried in the 1990s may not have been evaluated or determined eligible when initially recorded, but in 2024 is more likely to be eligible if revisited and reevaluated for the current project. Generally, if AHRS records state that the site was reported [or more importantly having gone through the Determination of Eligibility (DOE) and/or National Register of Historic Places (NRHP) process] more than 10 years ago, then that information likely needs to be updated by a qualified cultural resource professional.
- 4. Not all previously inventoried cultural resources have been formally evaluated for the National Register of Historic Place but may need to be evaluated for your project. Approximately 51,000 cultural resources sites have been inventoried to date across Alaska. Only 23 percent have been formally evaluated through the DOE or NRHP process to date. Sites may need to be formally evaluated if affected by a current project.
- 5. Not all AHRS information is digitized and within the AHRSPortal database. Several older cultural resources records, reports, and documents are housed at OHA and have not been digitally scanned, data entered, and document uploaded to the database. Cultural resources professionals can schedule an appointment to visit OHA and review requested documents.

Qualified cultural resources professionals can be contracted to conduct any or all cultural resources work for specific projects, including AHRS/AHRSPortal research. To aid with this, OHA provides a cultural resources contractors list, which can be found on the OHA website at <a href="https://dnr.alaska.gov/parks/oha/grant/contractorlistcurrent.pdf">https://dnr.alaska.gov/parks/oha/grant/contractorlistcurrent.pdf</a>. This list is periodically updated when new or revised information is provided by consultants. OHA highly encourages all non-SOI qualified government employees involved in projects that have the potential to affect cultural resources to work with qualified cultural resources professionals on staff or on contract to responsibly conduct project cultural resources work.