

## SCRIP STIPULATION INSTRUCTIONS

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**The following provides additional instructions for individual SCRIP Stipulations.  
These instructions are not discretionary.**

Stipulation Instructions correspond to the relevant SCRIP Stipulation (ie., Stipulation Instruction 1(A) on research designs expands upon SCRIP Stipulation 1(A): A research design shall be attached to the permit application).

Appendix A includes additional land-use Stipulations for State General Lands managed by DNR/DMLW. Appendix B addresses Frequently Asked Questions (FAQs). Additional guidance can be found in OHA's [Historic Preservation Series](#).

### 1. Permit Applications

#### 1 (A). Research Design

- The research design guides all aspects of the project and determines which activities are permitted in the SCRIP. This shall include, at a minimum:
  - The purpose and character of proposed work. The applicant must specify the type of work to be conducted, and cannot conduct activities that are not expressly permitted in their SCRIP. For example, as the development of a treatment plan to mitigate adverse effects on historic properties involves consultation with multiple parties, a SCRIP permitting Field Survey or Monitoring does *not* permit the applicant to subsequently conduct data-recovery Excavation as mitigation without consulting OHA.
    - Reconnaissance: OHA defines reconnaissance as non-ground-disturbing investigation, which may include windshield survey, walkover inspections, imagery analysis and aerial survey. While useful for planning more detailed survey efforts, it does not constitute a sufficient level of effort for site identification or clearance for projects where ground-disturbance will occur.
    - Field Survey: Most SCRIPS will fall under this category, which is archaeological survey for the purposes of site identification, determining site eligibility for the National Register of Historic Places, and determining potential adverse effects on historic properties. Field survey will include subsurface testing.
    - Excavation: Typically focused on data recovery as a mitigation measure, or as an academic research method. The goals and scale of excavation as mitigation will vary by circumstance, and be determined through consultation via development of a Memorandum of Agreement or project specific Programmatic Agreement.
    - Monitoring: Archaeological monitoring projects on state land also require a SCRIP, including submission of a monitoring plan. OHA defines monitoring as the direct on-site observation of the effect or influence of activities on cultural resources, which can include natural processes. A common task of monitoring is to evaluate an inadvertent discovery for eligibility for the National Register of Historic Places, or evaluate effects to a known property. For further guidance on

monitoring projects, see OHA's [Historic Preservation Series #15. Monitoring Guidelines](#).

- A general background section appropriate to the scale of the project.
  - The purpose of a background section is to ensure familiarity with the late Pleistocene/Holocene environmental history, known archaeology, and cultural history of the region surrounding the project area.
- A list of all known AHRs sites in the project area.
- Estimated acreage to be surveyed.
- Proposed fieldwork methodology sufficient to meet project objectives.
  - Survey methodology will be informed by the background environmental/cultural history of the region relevant to the project area.
  - Some environments may contain archaeological horizons that are buried too deeply to be found by traditional shovel testing methods.
  - It is the applicant's responsibility to determine when this is the case and provide means to discover all cultural horizons, or document why this level of effort was not appropriate for the project.
- A 1:63:360 USGS (ITM or "inch to mile") map that depicts the location(s) or area(s) of the proposed work. Project (i.e. "engineering") maps are desirable but should be supplemented by an ITM map.
- For further guidance on archaeological research designs, see OHA's [Historic Preservation Series #12. Archaeological Research Designs](#).

#### **1 (B). Professional Qualifications**

- Either the permittee or Field Supervisor must meet the professional qualification standards in [11 AAC 16.040](#). Fieldwork under the SCRIP shall be under the direct on-site supervision of a person who meets these standards.
- Field projects undertaken in response to the National Historic Preservation Act (e.g., "Section 106 Projects") shall be under the on-site supervision of a qualified professional satisfying appropriate professional qualification standards established in [43 CFR 7.8](#) and the Secretary of the Interior's Standards and Guidelines, [48 FR 44738-44739](#). These federal standards are more stringent than those in 11 AAC 16.040.

#### **1 (C). Determining Appropriate Land Management**

- OHA permits surveys on state-owned or managed land.
- The applicant shall identify which state agencies manage the land to be surveyed, and list in the research design the MTRS's for each state land agency.
  - Land Status layers on the Department of Natural Resources' online [Alaska Mapper program](#) are helpful for identifying state-owned or managed land and determining which state agencies manage that land.
- OHA must obtain approval from the appropriate state land manager(s) before issuing a SCRIP ([11AAC 16.030d](#)). If the state land manager decides it is not in their agency's best interest to approve a SCRIP for the applicant to conduct archaeological survey on their agency's land, and does not sign or otherwise approve the SCRIP, OHA cannot issue a SCRIP for survey on that land.
- Some land managing agencies require permits separate from the OHA SCRIP to access their lands.

- These agencies include Alaska Department of Fish and Game (fish bearing streams and state [Special Areas](#) [e.g. refuges, sanctuaries, critical habitat areas]), the [Mental Health Trust Land Office](#), the [University of Alaska](#), and the DNR/Division of Mining, Land and Water, who may require a permit for camping on state land (see Appendix A).
- The applicant shall contact these agencies to arrange for these permits. These agencies may require these separate permits to be in place before they sign the OHA SCRIP.

#### **1 (D). Processing Time**

- Allow at least 30 days for processing SCRIP applications.
- Turn-around time is largely dependent upon the response time of the appropriate land manager(s).
- OHA cannot guarantee SCRIP finalization by a specified date due to contributions to the process by non-OHA entities.

### **2. Permit Issuance and Termination**

#### **2 (A). Permittee Responsibility**

- OHA shall issue SCRIPs to only one permittee (applicant) per SCRIP. The permittee is responsible for ensuring that the terms of the SCRIP are carried out, including stipulation and reporting requirements.
  - The SCRIP is not transferrable. If a company changes its permittee for a project, OHA shall be notified and a new SCRIP executed prior to any additional fieldwork.
- Activities shall be conducted as described in the application packet submitted to and approved by OHA and the state land manager.
  - Deviations from the research design shall be justified in the final survey report; substantial deviations shall be approved by OHA prior to completion of fieldwork.

#### **2 (B). Script Amendments**

- A SCRIP may be amended, insofar as allowable by regulation and stipulation, to adjust contiguous or minor spatial changes, or to extend the termination date of a SCRIP.
- Requests for SCRIP amendments should be sent by email to [OHA.permits@alaska.gov](mailto:OHA.permits@alaska.gov).
- Amendments will only be issued at the discretion of OHA.

**2 (C).** OHA may terminate a SCRIP if the permittee fails to comply with the terms of the SCRIP and stipulations, or with other applicable laws, statutes, and regulations.

**2 (D).** SCRIP eligibility is contingent upon the satisfactory completion of prior SCRIPs. Applicants are not eligible for further SCRIPs until the requirements of SCRIPs from previous field seasons are satisfied. OHA may issue a permit for an upcoming field season if the applicant has extenuating circumstances delaying their report from the previous season and requests an extension on that report.

### **3. Permit Fieldwork**

#### **3 (A). Survey Methodology**

- The survey strategy proposed in the research design will be informed by the background environmental/cultural history of the region relevant to the project area.
- The applicant shall explicitly define how areas will be identified in the field as having a high priority for cultural resources.

- This shall include anticipated areas that shall be targeted for survey and testing (e.g., specific types of landforms, landscape contexts).
- Conditions on the ground cannot always be anticipated, therefore survey methodologies should also be flexible. Changes based on unanticipated conditions shall be discussed in the report. Significant changes shall be made in consultation with OHA.
- Survey transects should be spaced no greater than 10m apart, subject to vegetation and surface visibility.
- Aerial survey covering large areas (e.g., on the North Slope) shall require sufficient pedestrian coverage of appropriate landforms and natural exposures to support the conclusions of the survey report.
- If a predictive model will be used to guide survey strategy, its use must be approved by OHA or the appropriate authorizing agent prior to application.
  - The predictive model must be verified.
    - Low-level verification includes testing the predictive power of the model against known archaeological sites in the area. In this scenario, the applicant must address the potential weaknesses of the predictive model based on the biased survey coverage driving known site locations.
    - More robust verification is possible in iterative models through field testing. In this scenario, the predictive power of the model is tested against sites identified in blind field survey (survey conducted without consultation of the model) in a previously unsurveyed area. Large or long-term projects are best suited to this type of verification.
  - In addition to high probability zones, a subsample of medium and lower probability areas is necessary to ensure that the model is not merely reinforcing existing sampling bias.

### **3 (B). Subsurface Testing**

OHA expects subsurface testing shall be conducted.

**3 (B) (1).** Subsurface shovel tests shall measure 50 x 50 cm square. 30 cm round shovel tests are no longer acceptable.

- Shovel tests are conducted for site identification. For other tasks, such as evaluating eligibility for the National Register, larger excavation units may be required.
- Shovel test locations (mapped and coordinates) shall be included in the survey report, even if tests are negative.
- OHA expects soil descriptions, stratigraphic profiles, and photographs for positive shovel tests.
- For projects where all subsurface tests are negative, OHA expects descriptions and photographs of a representative subsurface test to be included in the report to record background sedimentary geology.
- The decision to terminate shovel tests at particular depths should be discussed in the report. OHA expects tests pits to be excavated through all potential cultural horizons.

**3 (B) (2).** OHA expects sediment from shovel tests to be screened through 1/8-inch mesh. If the applicant determines it more appropriate to use 1/4 -inch mesh instead, the decision will be discussed in the research design and final report.

- Screening methodology should be appropriate to the environmental history of the project area, as well as anticipated artifact classes.
- Sediments in certain environments are difficult to screen with 1/8-inch.

- In areas with heavily saturated soils, screening with the aid of water greatly facilitates the use of 1/8-inch mesh.
  - In some situations, it may be desirable to supplement 1/4-inch mesh screening with a subsample of defined strata through 1/8-inch mesh.
  - Any subsurface excavations including test pits, auger tests, and soil probes constitute ground disturbing activities, and shall be considered as such for other SCRIP stipulations (such as the mandate that ground-disturbing activities require a curation agreement).
  - Shovel tests shall be backfilled upon completion, unless the research design includes information about site stabilization between seasons, if units shall be left open, and a plan for surface restoration for projects that entail large block excavations.
- 3 (B) (3).** Artifacts recovered from excavations, including test pits, auger tests, and soil probes, shall be collected, analyzed for the survey report, and curated.
- The permittee may only implement a “no collection” policy for cultural materials if the materials are left undisturbed in original context (i.e., surface finds).
  - OHA expects an analysis of finds in the survey report.
    - For example, lithic analysis addressing implications of debitage and tool types, the use of local/exotic raw materials, activities likely performed at the site, potential seasonality of site occupation, etc.
- 3 (B) (4).** If the Field Supervisor determines subsurface testing is not warranted, the survey report shall provide an explanation and images showing why subsurface testing was not appropriate.
- If an area is disturbed, documentation is required to demonstrate that intact cultural strata are not still present.
  - For wet and marshy ground, a shovel test can illustrate water table and low probability for cultural material.
  - For permafrost, OHA should be consulted.

### 3 (C). Curation Agreement

- A. SCRIP applications for work that includes any ground disturbing activities and/or the collection of archaeological or paleontological materials shall be accompanied by a [Provisional Curation Agreement](#) signed by the University of Alaska Museum of the North, or by a written agreement from another repository approved by OHA.

### 3 (D). Human Remains

- In the event that human remains are discovered, the permittee shall cease work that would further disturb the remains and immediately contact the appropriate state agencies as required by AS 12.65.5.
- See [OHA website guidance](#) and [Historic Preservation Series #16](#) for laws and protocols pertaining to the Discovery of Human Remains in Alaska.
  - The permittee shall consult with OHA within two working days.
  - If logistical considerations (i.e., working in a remote area with no means of communication) prevent consultation within this timeframe, the applicant shall consult with OHA as soon as is practicable.
- If guidance for human remains discoveries is addressed in an overall project agreement document (such as a Memorandum of Agreement, Programmatic Agreement, or Recovery Plan), the permittee shall proceed in accordance with the agreement document, in addition to the above requirements.

### 3 (E). Compliance with Other Laws and Regulations

- Issuance of a SCRIP in no way absolves the permittee from complying with other laws and regulations that may apply.
- For instance, excavations are also subject to [Occupational Safety & Health Administration regulations](#).

## 4. Reporting

### 4 (A). Reporting Requirements

- Each permittee is responsible for ensuring that reporting requirements are met for work conducted during the terms of their SCRIPs.
- Reports shall be consistent with the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (48 Federal Register 44716-42, September 29, 1983) as well as the Alaska Historic Preservation Act.
- The report should include topics found in:
  - *Secretary of the Interior's Guidelines for Archeological Documentation* (48 FR 44716)
  - The OHA Report Checklist, (ADNR/DPOR Office of History and Archaeology, [Historic Preservation Series No. 3](#)).
  - The OHA *Standards and Guidelines for Investigating and Reporting Archaeological and Historic Properties in Alaska* (ADNR/DPOR Office of History and Archaeology, [Historic Preservation Series No. 11](#)).
- In addition to meeting other (SOI, OHA) reporting standards, survey and monitoring reports shall, at a minimum, include:
  - Project setting, with maps and descriptions of the areas surveyed, including a 1:63,360 USGS map.
  - Archaeological, ethnohistoric, and historic overviews as appropriate. When doing determinations of eligibility, include historic contexts, themes and periods of significance.
  - Summary of previous investigations and known sites investigated, if any.
  - Project description, research design/methods, and level of survey, with photographs of environment.
  - Area and acreage surveyed.
    - When possible, this should include maps with GPS tracks demonstrating pedestrian survey coverage.
  - Locations (on maps and in Lat/Long form in a table) of both positive and negative subsurface tests, as well as site locations.
  - Results of investigations with AHRS numbers and descriptions of sites.
  - Photographs of sites, test pits or excavations, and artifacts.
  - Summary and recommendations.
  - Eligibility recommendations, if appropriate.
  - References cited.

### 4 (B). Report Timeline

- The final report is due to the [State Archaeologist](#) within six months after the completion of fieldwork.
- An interim report is optional and may be submitted three months after the completion of fieldwork, but does not impact the due date of the final report.
  - An interim report does not constitute completion of a SCRIP.
- For multi-year SCRIPs, annual reports are required in addition to a final report.

- If an annual report is submitted, the permittee should provide a timeline for submittal of the final report.

#### **4 (C). AHRS Reporting**

- The permittee shall ensure that Alaska Heritage Resources Survey ([AHRS](#)) records are submitted to OHA for sites investigated under the SCRIP.
  - This includes both newly discovered sites and known sites that were re-investigated.
- AHRS records shall be [submitted in a format](#) that streamlines entry by OHA staff (i.e., staff should be able to “cut and paste”).
- Additional guidance on AHRS reporting is available [on OHA’s website](#), including [Historic Preservation Series #9](#).
- When the preparation of large numbers of site records is anticipated, permittees may be authorized to enter data directly into the OHA Integrated Business Suite via remote computer if determined to be appropriate by the AHRS Coordinator.

#### **4 (D). Report Availability**

- OHA shall make submitted reports available to cultural resource professionals, land managers, and others authorized by AHRS user agreements to access OHA records.
- Any information regarded proprietary or privileged for business reasons should be omitted or redacted from the reports prior to submittal.
  - If you feel that it is necessary to transmit proprietary information, it should be sent in a separate document, along with justification under federal or state law for holding the information proprietary and an expiration date for the document’s proprietary status.
  - Note that the basic information required under OHA Historic Preservation Series Numbers 3 and 11 and the list in 3(A) above are required and shall not be held proprietary.

**Appendix A: Land-Use Stipulations for State General Lands managed by DNR/DMLW:**

- A. Out Camp Use: Out Camps on state-owned land shall be temporary and portable. Sites shall be kept in a clean, safe condition. Commercial entities camping on state land, including those conducting CRM surveys, shall require permit authorization from the Division of Mining, Land and Water before camping. See [https://dnr.alaska.gov/mlw/factsht/land\\_fs/permits\\_commercial\\_recreation.pdf](https://dnr.alaska.gov/mlw/factsht/land_fs/permits_commercial_recreation.pdf), and [https://dnr.alaska.gov/mlw/forms/land/LUP\\_app\\_packet.pdf](https://dnr.alaska.gov/mlw/forms/land/LUP_app_packet.pdf). Establishment and use of any camp for more than 14 consecutive days requires authorization from the DMLW, and may require a permit from the Division of Environmental Conservation. All non-permitted camps shall relocate all gear and equipment a minimum of 2 miles at least every 14 days. Also see “A Fact Sheet of Generally Allowed Uses on State Land” at [https://dnr.alaska.gov/mlw/factsht/land\\_fs/gen\\_allow\\_use.pdf](https://dnr.alaska.gov/mlw/factsht/land_fs/gen_allow_use.pdf).
- B. Trash and Food Storage and Disposal: All trash, food, and litter should be stored to prevent access by animals, then removed from the site and disposed of properly.
- C. Human Waste Disposal: Solid human waste should be deposited in cat-holes dug 6 to 8 inches deep and located at least 200 feet from water, a camp, and trails. Pack out toilet paper and hygiene products.
- D. Motorized Travel Across State Land with No Roads: Vehicle use is limited to ATVs that can be operated without killing or breaking through the vegetative mat and exposing the soil to erosion. Existing roads or trails should be used whenever possible.
- E. Off-road Travel Within the North Slope Special Use Area (11 AAC 96.014(b)(1)): The North Slope Special Use Area designation requires a permit for all motorized travel off established roads on all State lands within the Umiat Meridian (ADL 40666). Transportation activities shall be limited to vehicle types, time periods, and locations approved by the DNR/Division of Mining, Land and Water.



## Appendix B: Frequently Asked Questions (FAQ's)

1. When do I need to obtain a State Cultural Resource Investigation Permit?

A SCRIP is needed when any survey of historic, archaeological or paleontological resources is undertaken on state lands (including tide lands and submerged lands). Archaeological surveys on state land are commonly undertaken in advance of public construction, though are also undertaken for research purposes to better understand the historic/archaeological/ paleontological resources in a region.

2. Do I still need to get a SCRIP if I don't intend on digging test pits?

Yes, a SCRIP is required for any cultural resource survey undertaken on state lands. These can include pedestrian surveys, windshield and aerial surveys, and geophysical studies (e.g., remote sensing, sonar, ground penetrating radar).

3. Do I need a SCRIP for archaeological monitoring on State lands? Yes, a SCRIP is needed for archaeological monitoring on state lands.

4. How long does it take for a SCRIP to be processed?

SCRIPs may take up to 30 days to process. The Office of History and Archaeology attempts to process SCRIPs and get permits out to applicants in a timely manner.

5. How long does a SCRIP last?

SCRIPs for surveys conducted in advance of a commercial project and/or for which the applicant is receiving remuneration are issued for one calendar year/field season. Archaeological and paleontological surveys for research purposes may apply for SCRIPs of up to three years in duration.

6. What do I do if I receive a SCRIP for a survey and then the project is cancelled?

If your project is cancelled before your survey takes place email [oha.permits@alaska.gov](mailto:oha.permits@alaska.gov) and explain the situation. After discussion OHA shall generally cancel the SCRIP.

7. Does submitting a report to fulfill my SCRIP stipulations also fulfill reporting requirements for Section 106 or Alaska Historic Preservation Act review?

No, submitting a report to satisfy SCRIP stipulations does not satisfy Section 106 or AHPA requirements, unless it is explicitly stated in the lead agency cover letter that it is being sent for both.

8. Who do I contact regarding SCRIPs?

For questions on SCRIPs email [oha.permits@alaska.gov](mailto:oha.permits@alaska.gov) or contact the State Archaeologist, Richard VanderHoek, at [richard.vanderhoek@alaska.gov](mailto:richard.vanderhoek@alaska.gov), or (907) 269-8728.