



United States Department of Agriculture

Cultural and Historic Resources Assessment

Tongass National Forest Plan Revision



Forest Service

Alaska Region

Tongass National Forest

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Cover Photo: Mendenhall Glacier Visitor Center, constructed in 1962, is one of the roughly 6,000 Heritage Resources currently recorded on the Tongass National Forest.

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Forest Service, Alaska Region

Prepared by: Kristina Hill
Heritage Program Manager
USDA Forest Service, Tongass National Forest

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Introduction

This report provides an overview of the affected environment and addresses the potential impacts associated with revising the 1997 Tongass National Forest Land and Resource Management Plan (Forest Plan), last amended in 2016. Cultural resources represent the tangible and intangible evidence of human behavior and past human occupation. Per Forest Service Manual (FSM) 2360.5, a cultural resource is “[a]n object or definite location of human activity, occupation, or use identifiable through field survey, historical documentation, or oral evidence. Cultural resources are prehistoric, historic, archaeological, or architectural sites, structures, places, or objects and traditional cultural properties”.

Resource Importance

Cultural resources are important for a variety of reasons. They represent the shared cultural heritage of the communities in and around the Forest and are often the only tangible representations of the human populations not typically characterized in written history. These types of resources are finite and nonrenewable with few exceptions. This means that, once a cultural resource is disturbed or destroyed, valuable information is lost forever. While the value of cultural resources is partially scientific, it also provides opportunities for public education, and more importantly, helps maintain cultural identity and cultural diversity, especially for Alaska Natives in the face of growing globalization. Cultural resources also hold cultural value to other groups, including but not limited to World War II veterans, miners, trappers, loggers, fishermen, and local community members. For reasons such as these, the Forest Service aims to preserve and protect cultural resources (FSM 2364.02).

Resource History and Current Management Direction

History and Archaeological Record

The Tongass National Forest has a rich and varied history. Important historic properties and other cultural resources that represent Alaska Native migration into the area thousands of years ago and the continued occupation of the area by the tribes are located within forest boundaries. In addition to the well-documented and publicized Ground Hog Bay, Hidden Falls and On Your Knees Cave archaeological sites, there are pictographs and petroglyph sites, cultural modified trees (CMTs), and seasonal hunting and fishing locations. Oral histories and ethnographies provide additional evidence of the location of sacred lands, battle sites, transportation and trade corridors, and traditional subsistence use areas. Additional pre-contact site types are identified below in Table 1.

Table 1. Precontact Archaeological Site Types

Type	Description
Artifact Scatters	Artifact scatters can contain lithic artifacts, ceramic artifacts, or both. These scatters can be the result of activities at resource procurement sites, habitation sites with either ephemeral or buried structures, or by the reuse of sites by individuals with different artifact types at their disposal.
Petroglyphs and Pictographs	These are human-created images that are found on rock faces, often on rock outcroppings or in rock shelters. Petroglyphs are images pecked, incised, or carved into the rock’s surface, while pictographs are painted images.
Agricultural Gardens, Fields, and Features	These include canals, check dams, rows, grids, and terraces designed to control the flow of water and/or facilitate the retention of soil moisture for agriculture. These sites may or may not be associated with permanent or semi-permanent habitation sites or fields.

Type	Description
Rock Shelters and Caves	Rock shelters and caves are naturally occurring cavities or overhangs in rock formations that were used by people primarily for habitation or burial. Many rock shelters or caves were used by groups or individuals of several cultural periods and have multiple, successive layers of occupation.
Fish Traps and Weirs	Wooden and stone fish traps utilize rocks to form alignments in the intertidal - fish are funneled into traps as the tide rises and are trapped when the tide recedes.
Canoe Runs	Parallel alignments of rock and cobble that have been moved to facilitate access for a boat or canoe
Totem Poles	Southeast Natives are famous for their totem pole carvings. There are six basic types of totem poles: house frontal poles, interior house posts, mortuary poles, memorial poles, welcome poles, and ridicule or shame poles. Given the complexity and symbolic meanings of the carvings, a totem pole's importance lies in the observer's knowledge and connection to the meanings of the figures and the culture in which they are created.
Shell Middens	These are buried heaps of shell, charcoal and bones that were tossed aside after harvest and meal preparation. Often found in/adjacent to habitation sites or agricultural features.
Defensive Sites	Defensive sites, sometimes called forts, are characterized by defensive walls and locations with restricted access such as a hilltop.

Early contact with Europeans and the subsequent exploitation and colonization of Southeast Alaska has resulted in cultural resources representing early Russian occupation, fur farming, gold mining, large scale fishing and canning operations, and the timber industry. Historic properties and other cultural resources representing these different uses and periods of history are present within the forest. Other historic site types in the Tongass National Forest are identified in Table 2 below.

Table 2. Historic Activities and Associated Historic Site Types

Historic Context	Site Types
Protohistoric occupation	Temporary Camps Fields Ramadas/shades Sweat lodges Storage pits Processing pits
Military	Forts Camps Trails Battlefields Blazed trees Way stations
Settlements	Houses Outhouses Barns Graveyards Corrals Public buildings Trading posts Dumps
Farming	Homesteads Outbuildings Fields Irrigation Fencelines

Historic Context	Site Types
Mining	Camps Towns Shafts Adits Mills Processing Locations
Transportation/Utility Corridors	Roads Power Lines Hydroelectric Infrastructure Trails
Lumbering (Timber Harvesting/Logging)	Camps Landings Railroad beds Sawmills
Water Reclamation	Dams Construction Camps Reservoirs
Forest Service and Civilian Conservation Corps (CCC)	Cabins Campgrounds Ranger stations Camps Recreation Areas

Current Management Direction

Legal and Regulatory Compliance

While numerous federal laws and executive orders are in place that address historic preservation and tribal consultation on federal lands, the National Historic Preservation Act (NHPA) of 1966, as amended sets the legal framework for heritage resource management on Federal system lands. NHPA Section 106 directs all Federal agencies to consider the effects of their undertakings (actions, financial support, and authorizations) on properties included in or eligible for the NRHP. Advisory Council on Historic Preservation regulations at 36 CFR 800 implement NHPA Section 106, and these regulations contain the definitions utilized to determine the potential effect, if any, that any given undertaking will have on cultural resources.

The Area of Potential Effect (APE) for a given project is defined as "... the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties... The area of potential effects 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)]. An Effect to a cultural resource is defined as "... alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." [36 CFR 800.16(i)]. An Adverse Effect is found "when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." [36 CFR 800.5(a)(1); see subsection (a)(2)].

In accordance with 36 CFR 800.14(b)(2), federal agencies have the option to pursue "Program Programmatic Agreements", which allow the agency to create a Section 106 process that differs from the standard review process and that will apply to all undertakings under a particular program. These agreements are typically used by agencies with programs that have undertakings with similar or repetitive

effects on historic properties to avoid the need for a separate Section 106 review for each project. Long-term consultation with the Alaska State Historic Preservation Office (SHPO), Office of History and Archaeology and Region 10 policy has resulted in the *Programmatic Agreement Among the USDA Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Officer Regarding Heritage Program Management on National Forests in the State of Alaska*, signed July 10, 2017, and amended on December 8, 2017, July 7, 2022, and August 11, 2023.

Other laws under which heritage resource management must comply include the Native American Graves Protection and Repatriation Act (NAGPRA), the Archeological Resources Protection Act (ARPA), the American Indian Religious Freedom Act, National Environmental Policy Act, and National Forest Management Act. Executive Orders and Memorandum include 1994 Government-to-Government Relations with Native American Tribal Governments, Executive Order (EO) 13007 Accommodations of Sacred Sites, and EO 12898 Environmental Justice as directed by the Forest Service Manual and Handbook. Since the signing of the 2016 Amended Forest Plan, several new rules, regulations, directives and policies have been implemented. These included the new Planning Rule regarding Indigenous Knowledge (36 CFR 219), new regulations from the Council on Environmental Quality (CEQ) regarding NEPA processes, and new regulations from the National Park Service regarding the implementation of NAGPRA.

Other Agency Guidance and Direction

Forest Service Manual (FSM) 2360 states that “the study of cultural resources provides a broader understanding of past human interaction with the land. It helps guide actions that affect resources and the people who depend on them” (FS2360.6), and addresses three broad areas of responsibility:

1. Protect historic properties,
2. Share their values with the American people, and
3. Contribute relevant information perspectives to natural resource management.

This FSM and Forest Service Handbooks (FSH) 1509 and 2309 are the documents through which the Washington Office outlines implementation of 36 CFR 800, providing the foundation for agency policy and procedures. Owing to the complexity and diversity of heritage or cultural resources on the National Forests, the Forest Service Manual does not specify one overarching desired future condition. However, FSM 2364.02 lists as the first three objectives for the protection and stewardship of Heritage resources:

1. Protect cultural resources in a manner consistent with their National Register qualities and management allocations.
2. Avoid or minimize the effects of FS or FS-authorized land use decisions and management activities on cultural resources.
3. Safeguard cultural resources on National Forest System lands from unauthorized or improper uses and environmental degradation.

FSM 2360 directs Forest Heritage Programs to provide opportunities to foster greater connection between people and cultural resources as well as contribute to the use and enjoyment of cultural resources, when applicable, to social, economic, and ecological sustainability. Such opportunities and contributions may include, but is not limited to, scientific investigation, education through interpretation, and volunteerism. Additional opportunities are outlined in the FSM include protection and stewardship, officially designation of publicly recognized cultural resources (such as to the National Register of Historic Places (NRHP) or designation as a National Historic Landmark), and the conservation and maintenance of cultural resources (FSM 2364.40-43).

Existing Land and Resource Management Plan

The Land and Resource Management Plan (Forest Plan) guides all resource management activities and establishes management direction for the Tongass National Forest. “It describes resources management practices, levels of resource production and management, and the availability and suitability of lands for different kinds of resource management” (Forest Plan 2016:1). The current Forest Plan was signed in 2008 and amended in 2016. As presently written, no desired condition is identified for Heritage resources. Given how the Forest Plan is laid out (split out by land use designations (LUDs)), direction provided for heritage resources is redundant and duplicated multiple times throughout the document. The current language is very verbose, parroting existing law and regulation almost verbatim, and contains language better suited for other management tools (i.e., memorandums of agreement, programmatic agreements, documentation standards, and process guides). Additionally, the language and intent of some plan components do not align with current National direction (for example, the frequency of inspections for significant properties, the use of the term ‘selected sites’ versus ‘priority heritage asset’ (PHA), and mandating site visits to adjacent cultural resources upon identification and documentation of new damage/vandalism).

It is difficult to assess whether or not the existing plan components are performing as intended, since the Forest Service does not currently have mechanisms in place to track plan component efficiency within the current monitoring plan. We are, however, able to say that current best practices and agency strategies are effective in managing known and unknown cultural resources, based upon some of the variables that are tracked through monitoring. For instance, current Forest Service practices allow Heritage professionals to track the efforts undertaken by the Forest Service to identify and evaluate new cultural resources, as well as identify how these resources are being managed and impacted by individual project activities.

Scope and Scale of Assessment

The scope and scale of this assessment is based on the evaluation of expected conditions for the next ten to fifteen years (or the life of the plan) and is limited to cultural resource information collected within the boundaries of the Forest. There are very few parts of the Tongass that do not contain cultural resources nor any that have no history of association with one or more of the Native Alaskan tribes.

Recreational development of cultural resources for interpretation must consider accessibility and so must be tied to the transportation system. Off-site outreach activities, educational programs, and unguided public visitation of archaeological sites clearly relate to the Tongass National Forest as a whole. Individual characteristics of each resource were obtained through review of the NRM Heritage database and available hardcopy information. Trends in past and future planning, condition of known cultural resources, and shifting and changing environmental regimes were also examined to inform this resource assessment. Project-specific demands, funding and activities fluctuate year-to-year and there are no reliable trends available that show otherwise.

Status and Trends

Current Status of Heritage Resources

Most of the lands on the Tongass National Forest have not been surveyed for cultural resources. It is estimated that only 0.0092 percent (154,670 acres as of October 1, 2023) of the Forest has been surveyed. At the same time, cultural resource investigations of the Tongass NF have identified roughly 5,599 cultural resources within its Forest boundaries (per the NRM Heritage database, accessed on July 9, 2024). These cultural resources range in age from ca. 12,000 BC to the mid-20th century. Pre-contact sites make up 39.4% (n = 2,205), historic sites make up 46.3% (n=2,593), while the remaining 14.3% (n=801) are listed in the database as unknown (most likely missing information from the database), illustrated in Figure 1 (Chart 1). Some sites contain both prehistoric and historic components; however, this information does not appear to be annotated in the database. There is one traditional cultural property currently identified within the boundaries of the Forest. It is anticipated that as more of the Tongass NF is

surveyed for cultural resources, the number of known cultural resources will increase.

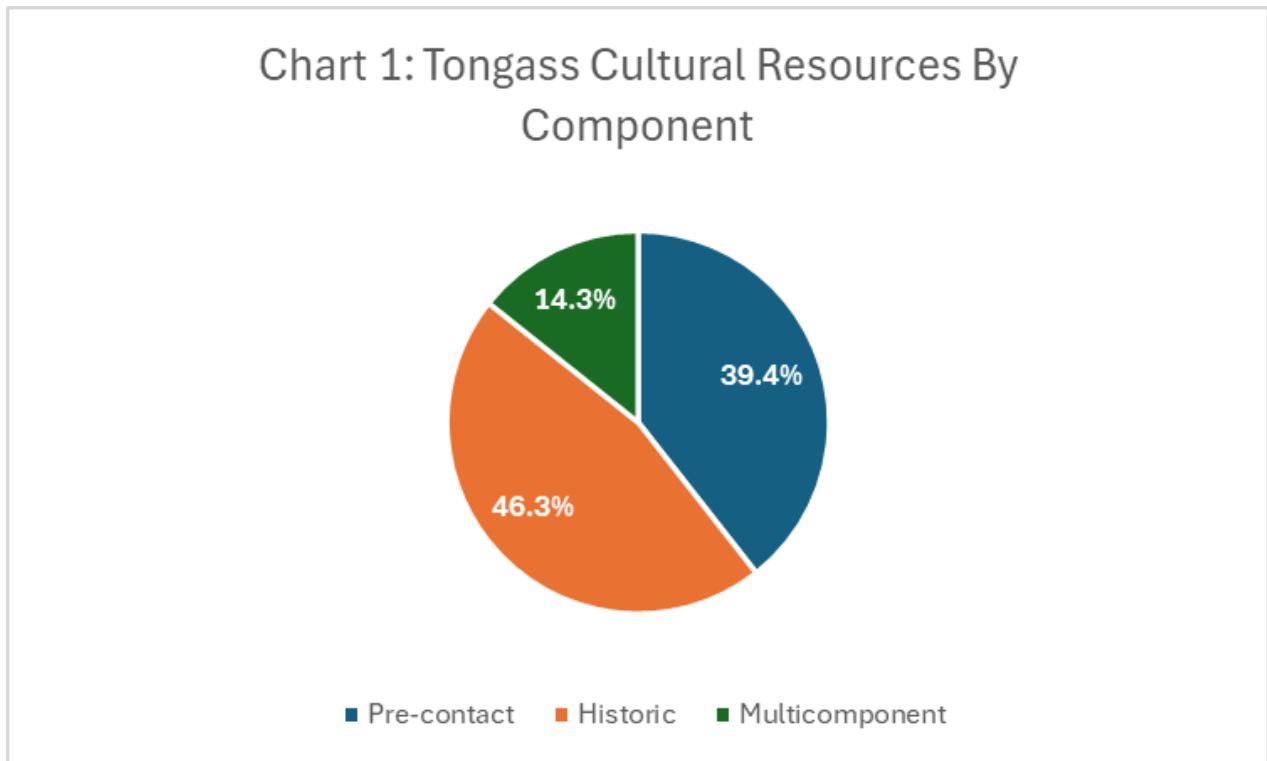


Figure 1. Percentages of known pre-contact (blue), historic (orange) and multicomponent sites (green) on the Tongass National Forest where surveyed.

Cultural resources that are listed or eligible for listing on the NRHP (also known as historic properties) make up 17% (n=954) of the recorded cultural resources on the TNF. As displayed in Figure 2 (Chart 2), cultural resources that have been determined to be not eligible to the NRHP are 5.2% (n=291), and more than 77.8% (n=4,354) have not been evaluated against NRHP significance criteria (36 CFR 60.4).

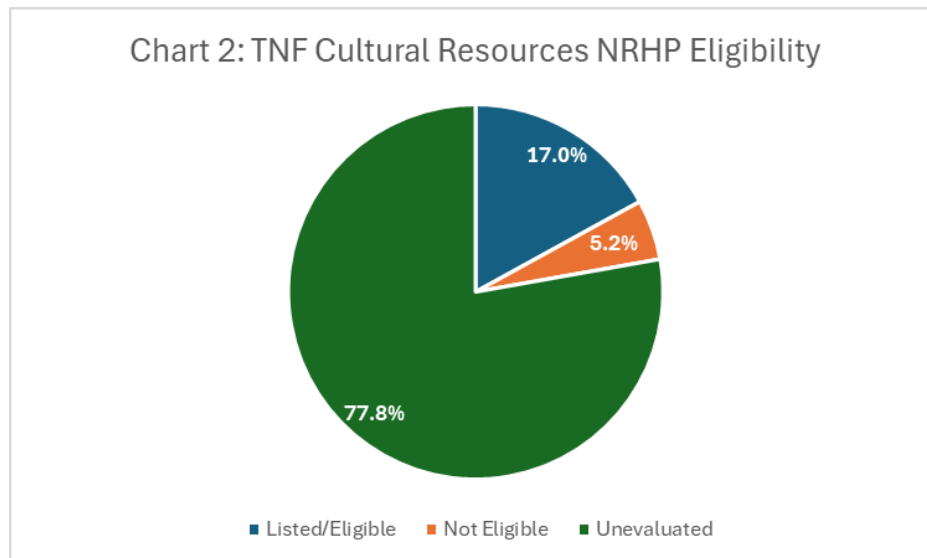


Figure 2. Percentages of historic sites listed or that are eligible (blue), not eligible (orange) or not yet evaluated (green) per the National Register of Historic Places (NRHP) or designation as a National Historic Landmark.

Of the 954 historic properties currently identified on the Tongass National Forest, 230 of them have been identified as Priority Heritage Assets (PHAs). PHAs are defined as significant heritage assets of distinct public value that are or should be actively maintained and meet one or more of the criteria listed in FSM 2360.5. They can include cultural sites, collections and associated records. PHAs are monitored on a 5-year schedule, though some sites are remote and hard to access, and as such do not meet the schedule (2360 Program Managed to Standard). Most PHAs on the Forest are documented as ranging from fair to good condition (Heritage Web Natural Resource Manager (H-web NRM) database). Cultural resources are monitored through validation and effectiveness efforts each year. The selection of which sites get monitored is largely random but are also based on which sites are scheduled for monitoring. The cultural resources on the Tongass range in condition between “excellent” and “destroyed” (HWeb NRM database).

Trends, Stressors and Drivers

A myriad of trends, stressors and drivers impact the stability and resiliency of cultural resources; among them are the global increase in heritage tourism, the lack of capacity in the workforce, the likelihood of increased size and scope in future project planning, effects to cultural resources, site vandalism/looting, and availability of Forest data.

Heritage Tourism

The National Trust for Historic Preservation defines heritage tourism as “traveling to experience the places, artifacts, and activities that authentically represent the stories and people of the past and present, and typically includes interest in and visitation to cultural, historic, and natural resources”¹. While exposure to different histories, cultures, and traditions has historically been a primary motivation of travelers, the term ‘heritage tourism’ or ‘cultural heritage tourism’ was not formally coined and defined until the mid-1990s. Since then, research has found that popular interest in cultural heritage tourism has steadily increased. This trend was recently reaffirmed in 2018 by the World Tourism Organization (UNWTO) “as a major element of international tourism consumption, accounting for over 39% of tourism arrivals” (Richards 2018:13). It is anticipated that, as populations age and live longer, the positive trend for this type of visitor experience will continue to increase.

Simultaneous to the tourism trends happening external to the Forest Service, heritage professionals within the agency were beginning to note an increase in the public’s interest for historical and cultural sites. One of the earliest Forest Service attempts to harness this interest was the development of the Passport In Time (PIT) program, which was established in 1988. The PIT program allows volunteers to help complete archival research and in-field investigations.

At about the same time, the Washington Office of the USDA Forest Service began to have internal discussions regarding the identification of a national strategy for heritage. These discussions resulted in the 1992 Heritage Strategy, a directive that emphasized the protection of cultural resources within the context of Forest Planning and Implementation. This strategy attempted to move the heritage program more firmly into the arena of site enhancement and public outreach, but was primarily non-site specific, owing to a lack of funding for development and interpretation. Despite these efforts, “very few managers have given much thought to public interpretation opportunities...” and “[f]orest plans give little attention to the interpretive aspects of cultural resources” (National Forest Management Act, Section 219.24).

¹ Unknown Author. “Heritage Tourism” found at the National Trust for Historic Preservation webpage, <https://savingplaces.org/stories/preservation-glossary-todays-word-heritage-tourism#.W7O43WYUkSs>. Retrieved 26 September 2018.

Further discussions at the RO and WO of the Forest Service continued throughout the mid- to late- 1990s. Out of these discussions came the ‘Heritage – It’s About Time’ National Strategic Plan. This strategic plan built upon the 1992 Heritage Strategy, further articulating the role of the heritage program in achieving the overall mission and vision of the Forest Service. The plan sought to clarify and define the heritage program in terms of three key components: stewardship, public service, and a context for nature resource management.² The National Strategic Plan was adopted agency-wide in 2001.

The direction provided in the National Strategic Plans of 1992 and 2001 indicates that the Tongass NF should have been actively managing its cultural resources in order to provide visitors historic experiences and educational opportunities. Attempts by the Forest to provide such experiences during this time period appear to be disorganized. Interpretive plans for the Mendenhall Glacier Recreation Area and Visitor Center and the Auk Recreation Area were completed, but interpretative plans for other sites, such as the Ward Lake Recreation Area, Yakutat’s Cannon Beach and others, were discussed internally by the Forest but were never completed. Still other attempts to provide heritage tourism opportunities were not planned at all; instead, their implementation was in reaction to external pressures on archeological sites in need of site protection measures.

Workforce Capacity and Future Project Planning

The Tongass National Forest has a dedicated, hard-working Heritage workforce striving to achieve Heritage program objectives. Due to hiring difficulties, thirteen positions in the target organization remain vacant at the time of this writing (2025), and remaining staff is unable to meet all program objectives. Most districts have little to no backup when unanticipated Heritage needs arise, nor is there knowledgeable staff to train newly hired archaeologists and technicians, resulting in additional impacts to fulfilling workload needs. These workforce limitations constrain the Forest Service’s ability to plan and implement projects, meet the interest of various stakeholder groups, or investigate, monitor, enhance, interpret or use cultural resources for agency and public benefit. Given these staffing limitations and shared concerns over cultural resources geographically located within the boundaries of the Tongass, several Southeast Alaskan Tribes have expressed interest in pursuing partnerships for the stewardship and protection of the cultural resources on the forest.

Management activities have historically occurred across all NFS lands, including designated wilderness areas, and future project planning within the Forest is anticipated to increase in size and complexity over time. Such activities include wildland fire suppression, vegetation management, developed recreation and others. Each of these projects (e.g., undertakings) fall under management decision, and all management decisions require legal and regulatory cultural resource compliance processes. It is required that, prior to making a project-level decision that is subject to NHPA, the forest complete cultural resource surveys to locate and evaluate sites for the National Register of Historic Places (NRHP) and analyze the effects of the proposed use or activity in compliance with *Programmatic Agreement Among the USDA Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Officer Regarding Heritage Program Management on National Forests in the State of Alaska*, signed July 10, 2017, and amended on December 8, 2017, July 7, 2022, and August 11, 2023. Following the identification and recording of cultural resources, mitigation measures appropriate to the proposed undertaking would be implemented. Such measures would most likely include avoidance of cultural resources by redesigning the project boundaries, modifying construction plans, or excluding site areas from treatments. In cases where specific activities would constitute an adverse effect and avoidance could not be accomplished, the adverse effects would be resolved in accordance with 36 CFR §800.

² Unknown author. “Heritage – It’s About Time! A National Strategy” found at Forest Service website [Heritage Strategy \(usda.gov\)](https://www.usda.gov/heritage). Accessed August 22, 2024.

Effects to Cultural Resources

Analysis of the specific effects to cultural resources can be complex and the potential effects may seem contradictory. The solutions typically reflect that situation. Access can be both beneficial and detrimental depending on what aspects of preservation, management, and use of cultural resources are under discussion. The relationship between cultural resources – archaeological and historic sites, sacred sites and traditional use areas – to forest management has always been one of balancing positive and negative effects. Management activities have historically adversely affected cultural resources prior to the establishment of laws and regulations meant to protect those resources, which has contributed to a backlog of deferred maintenance and protection needs. The effects can be direct impacts from the construction or use of a road or trail, or they can be indirect, resulting from activities allowed or enhanced by project implementation. In turn, these effects can be foreseeable and legitimate (such as hunting and camping) or unforeseeable and illegal (such as the vandalism and looting of archaeological sites).

Benefits are generally indirect, and derive from the enhanced ability to monitor, manage, and protect archaeological and historic sites and provide access for Alaska Native people to sacred and traditional use sites. Balancing positive and negative effects, however, is not a straightforward task and requires continual monitoring to maintain any kind of equilibrium. In many ways, the management of cultural resources on public land is a matter of risk assessment against two competing philosophies and a choice as to whether these resources, the legacy of all Americans, should be accessible to everyone or protected from the public and accessible only to a privileged few.

Cultural resources, depending on their nature and composition, are subject to several different types of impact from activities. All archaeological and historic sites are irreplaceable and individually unique. Their integrity is wholly dependent on the contextual relationship between artifacts, architecture, and the environment in which they are found, something that cannot be recreated or restored once disturbed. They are also, by their very nature, previously affected, reduced by the transformation processes of erosion and decay from their original pristine state. Time and weather degrade the physical integrity of structures and buildings, as well as degrade and destroy archaeological sites through alteration of landforms and soils. Changes in climate has the potential to accelerate both nature and human-caused effects to cultural resources. Extreme weather events such as heavy rainfall and wind events that saturate forest soils, tip trees and increase the likelihood of landslide/tree blowdown events and flood events, are anticipated to increase across the Tongass (Littell et al, draft 2024). Shifting or changing environmental regimes are likely to affect the physical and visual integrity of some cultural resources and traditional use landscapes. Any effect to cultural resources, therefore, is cumulative; they cannot grow back, and their populations cannot rebound.

Direct effects to cultural resources, especially archaeological sites, can be generally defined as anything that results in removal of, displacement of, or damage to artifacts, features, or stratigraphic deposits of cultural material. In the case of cultural resources which are considered eligible for inclusion in the National Register of Historic Places (NRHP), direct effects can also include alterations of a property's setting or context. In the case of traditional cultural properties and sacred places, additional considerations may include alterations in the presence or availability of particular plant species. Indirect impacts to cultural resources come from activities associated with the use of the Forest. The most commonly cited indirect effects are site contamination with modern trash and surface artifact displacement associated with recreational management activities, such as dispersed camping areas and remote setting nature tour areas, as well as increased in heritage tourism. Forest users also cause direct and cumulative 'wear and tear' impacts to Forest interpretive sites and historic public use facilities, such as public use cabins and along historic trails.

Site Vandalism/Looting

Vandalism and looting, dating back to at least the mid-19th century, has been seen throughout the Forest, though it can be argued that such episodes are more widespread in association with motorized access (be it a car or watercraft) since some motor vehicles allow visitors to bring in more trash and remove more resources than they would normally be able to on foot. Vandalism in wilderness and roadless areas – though on-going – is only rarely reported because fewer people are able to visit cultural resources in those areas. The relationship between access and looting over the last two centuries or so has been neither constant nor straightforward.

Reporting of vandalism, a key aspect of protection and law enforcement, is often a direct reflection of access. Forest Service personnel, Native Alaskan tribes, and members of the general public report incidents as they find them on a regular basis. The direct result of increased visitation and access by heritage professionals, law enforcement officers, and a concerned public has resulted in the reduction of looting and vandalism of archaeological sites on the Forest since the passage of Archeological Resources Protection Act in 1979. However, the attitude persists that making archaeological sites difficult to find or access is the best way to protect them, even going so far as to suggest that if it is difficult to monitor a site, then it would also be more difficult for vandals and looters to disturb that site. This is a fundamentally incorrect assumption for two reasons. First of all, looters and most visitors to the Forest do not have the same levels of motivation and physical ability. Second, if it is more difficult to observe a site, it is therefore easier for a looter to avoid detection at that site. Limiting the ability to monitor sites merely guarantees the looter exclusive access to an area where he will have relative assurance of not being observed.

Given this history, it would appear that both concepts of accessibility and attitudes toward vandalism and looting archaeological sites have changed over the years. Sites have been looted everywhere on the Forest, even in those areas perceived as inaccessible today. Despite any apparent correlation between access and vandalism, the fact remains that unregulated inter-island access across the Forest has always been and remains a much greater threat to archaeological sites. Indirect effects additionally can include a reduction in the agency's ability to protect sites from vandalism and looting. They can also reduce accessibility of traditional resources and sacred areas to Alaska Native people.

The advent of social media and the rise of public interest in visiting historic and cultural sites (see Heritage Tourism) have also contributed to the increased likelihood of looting across the Forest. For many years, social media outlets have been primarily focused on historic sites that contain obvious above-ground surface features. More recently, YouTube content, Facebook blogs, and other social media sites have begun sharing the locations of Alaska Native burials and archaeological sites where there is little surface evidence above ground. The release of such site-specific information to the public often results in increased visitation and subsequently the looting of these sensitive sites. Alaska Native tribes and corporations are becoming increasingly aware of this issue and have requested that the agency consider steps to curtail this release of information. While the Forest Service, as the steward agency, has an obligation to protect them from harm and uses two primary laws to restrict location information: Archaeological Resources Protection Act (ARPA) and the National Historic Preservation Act (NHPA), the agency has no regulatory means of controlling what is put out to the public by private individuals. The Forest has been working with tribal partners and other historic preservation interests to discourage the public sharing of information that might be detrimental to the cultural resources of the Tongass.

Availability of Forest Data

The lack of complete cultural resource inventory across the Tongass NF leaves data gaps in FS databases and does not allow for a full understanding of the archaeological or historic record across the Forest. As

noted above, most of the lands on the Tongass NF (99 percent) have not been surveyed for cultural resources. Given that there are 5,599 archaeological sites within the surveyed portion of the Forest, one might assume that there are more than 554,000 additional unknown sites located on the Forest. There are, however, certain variables within the environment that can either limit or intensify the likelihood of human use and occupation. This is especially evident in prehistoric archeology. Most archaeologists agree that long-term occupation sites usually require flat ground that have needed resources in close proximity. This can include such resources as water, food sources (hunting locales and fishing areas) and shelter. Smaller sites, usually interpreted as short-term occupations or hunting camps, can also be present due to the availability of resources. Access to other types of resources can also cause an increase in the likelihood of archaeological sites; this can include geological features that are higher than the surrounding environs (for lookouts and forts), easy defensibility or management of pinch points in the topography, or access to major trade routes. While there are always exceptions, most of the prehistoric site types listed above (Table 1) fit this analytical model. The only prehistoric site types that do not seem to favor this model are the locations of petroglyphs, pictographs, rock shelters and caves. Inversely, when needed resources are unavailable or inaccessible in an otherwise favorable setting, the likelihood of archaeological sites decreases. Much of the areas previously surveyed on the Forest focus on these areas most likely to contain available resources, thus it is unlikely that the number of unrecorded prehistoric archaeological sites would increase as much as the overall lack of archaeological survey would suggest.

Historic sites, on the other hand, only follow these assumptions on a very basic level. Sites like dams, reservoirs, recreation areas, and mines relate enormously to the accessibility of a specific resource (e.g. water or minerals). Yet there are other sites whose locations cannot be explained simply based on resource accessibility. Advances in technology and changes in transportation methods often de-emphasized the need for resources to be close by. Additional factors, such as locations of resource processing (e.g. sawmills), settlement patterns (e.g. homesteading and farming), and access to current transportation systems (e.g. railroads, roads), can have a bigger influence than resource location on the placement of historic sites on the landscape. Thus, of the two general site types, locating historic archaeological sites is much more complex and requires the survey of geological locations that would not otherwise contain archaeological sites. Because previous efforts have focused on proximity to resources such as water, food items, and transportation corridors, it would be like that the number of unrecorded historic archeological sites would increase.

The analysis for Forest plan revision was completed by the Forest Archeologist using the spatial, digital, and hardcopy records currently located within the archives of the Tongass NF Heritage program. This analysis followed current professional standards. The corporate database of record for the USDA Forest Service (known as Heritage Natural Resource Manager (NRM)) has been consistently updated since its inauguration in 2012. For these reasons, it was assumed during analysis that any available information regarding previously conducted cultural resource surveys and recorded archaeological sites would be located somewhere within the archives (although not necessarily in the same format). The analysis found that while further temporal and cultural information is likely to be gained through additional survey, it is unlikely that new, as yet unidentified, site types will be located during new projects, since most new projects are generally in the same physical location as previously conducted projects.

Per Section I.e.2 of the *Programmatic Agreement Among the USDA Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Officer Regarding Heritage Program Management on National Forests in the State of Alaska*, signed July 10, 2017, and amended on December 8, 2017, July 7, 2022, and August 11, 2023, the Forest Service may determine that further inventory will not be necessary for the area of potential effect if “[a]ppropriate identification and evaluation research has been carried out to the degree required to make decisions regarding the historic properties that may be affected by this undertaking.” (PA:5). Given that most of the current archival

survey records date prior to 1999, it can be assumed that some of the currently surveyed areas on the Forest would require a professional standards and methodology review prior to use on current undertakings.

Key Takeaways

- The Tongass NF contains cultural resources that document continuous human presence for at least the past 10,000 years. Alaska Native peoples have oral histories of their ancestors living in Southeast Alaska since time immemorial.
- Approximately 5,599 cultural resources are recorded on the Tongass NF, including sites on or eligible to National Register of Historic Places. A majority are documented as being in fair to good condition.
- Most of the lands on the Tongass NF (>99%) have not been surveyed for cultural resources. Lack of complete cultural resource inventory across the Tongass NF leaves data gaps in FS databases and does not allow for a full understanding of the archaeological or historic record across the Forest. As more surveys are conducted, we can assume the number of cultural sites will increase.
- Cultural resources, sacred sites, sacred places, tribal cultural landscapes, and traditional cultural properties have religious, cultural, and traditional importance to Alaska Native tribes, ANCSA corporations, and historic land users and are part of National Historic Preservation Act dialogue and interaction with tribes and other interested parties.
- The current Forest Plan does not facilitate the Forest actively managing cultural resources to provide visitors with historic experiences and educational opportunities. Increased active management of these resources could generate additional funding through heritage tourism, supporting interpretation, maintenance and stewardship of its unique cultural heritage.
- All cultural resources are irreplaceable and individually unique. Any effect to cultural resources, therefore, is cumulative.
- Management activities occur across all NFS lands and require legal and regulatory cultural resource compliance processes. The Tongass NF should continue to follow federal laws and regulations and agency directives and policy that preserve, protect, enhance, and provide guidance for managing cultural resources on federally owned lands. These laws and regulations include, but are not limited to NHPA, ARPA, NAGPRA, and NEPA.
- As currently written, the Forest Plan is repetitive and contains direction that is either already articulated in law, regulation and policy, better suited for other management tools (i.e., memorandums of agreement, programmatic agreements, and process guides). The current monitoring plan does not track the efficacy of individual plan components.

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Glossary

Heritage resources

The physical remains of districts, sites, structures, buildings, networks, events, or objects used by humans in the past. They may be historic, prehistoric, architectural, or archival in nature. Heritage resources are non-renewable aspects of our national heritage

Also referred to as Cultural Resources. Heritage resources are associated with sites of human activities or events. According to the Glossary of National Register Terms in National Register Bulletin No. 16A, site means “location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of any existing structure.” Heritage resources include archaeological features, sites and districts, artifacts, historic structures and buildings, cultural and ethnographic landscapes, sacred sites and cemeteries, and traditional cultural properties, and may have both tangible and intangible qualities. Effects considered under NEPA include cultural resources and historic (40 CFR 1508.8) without regard to their National Register eligibility.

Historic property

Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places. The term includes artifacts, records, and remains that are related to and located within such properties.

Properties of religious and cultural significance to Indian tribes and Native Hawaiian organizations may be determined to be eligible for inclusion in the National Register. [16 U.S.C. 470a(d)(6)(A)] See also Heritage Resources.

National Historic Preservation Act

The National Historic Preservation Act (NHPA), 54 USC §300101 et seq., is the primary federal law governing the preservation of cultural and historic resources in the United States.

National Register of Historic Places

A register of cultural resources of national, state, or local significance, maintained by the US Department of the Interior.

Eligibility to the National Register requires certain criteria to be met. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and A) that are associated with events that have made a significant contribution to the broad patterns of our history; B) that are associated with the lives of significant persons in or past; C) that embody the 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) that have yielded or may be likely to yield, information important in history or prehistory.

State Historic Preservation Officer (SHPO)

The official appointed or designated pursuant to §101(b)(1) of the National Historic Preservation Act of 1966, as amended, to administer the State Historic Preservation Program.

Traditional Cultural Property (TCP)

A traditional cultural property is generally one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in

that community's history, and (b) are important in maintaining the continuing cultural identity of the community. Examples include a rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents; or a location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice. See also Sacred Sites and Heritage Resources.

Undertaking

In cultural resources, any project, activity, or program that can result in changes in the character or use of historic properties, if any such properties are in the area of potential effects. The project, activity, or program must be under the direct or indirect jurisdiction of a federal agency or be licensed or assisted by a federal agency. Undertakings include new and continuing projects, activities, or programs and any of their elements not previously considered under Section 106, National Historic Preservation Act of 1966, as amended.

In cultural resources, an undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval (see 36 CFR 800 (16)(y)).