



**U.S. DEPARTMENT OF TRANSPORTATION**  
FEDERAL HIGHWAY ADMINISTRATION  
ALASKA DIVISION

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April 27, 2006

REFER TO  
HDA-AK  
File #: MGS-STP-BR-0310(5)/52930

Ms. Carol Legard, FHWA Liaison  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, DC 20004

SUBJECT: Amaknak Midden Site (49-UNL-050), South Channel Bridge Replacement Project

Dear Ms. Legard:

Over the last few weeks my staff has had several conversations with you related to the subject project. You informed us that you have received several objections from the public in response to the proposed Salvage Recovery Plan (see Enclosure 1) for the Amaknak Midden Site (49-UNL-050). You indicated that you had obtained copies of several project related documents including the Salvage Recovery Plan, the Data Recovery Plan, and the previously executed Memorandum of Agreement (MOA) via the Alaska Department of Natural Resource website found at <http://www.dnr.state.ak.us/parks/oha/unalaskabrdg/southchanbridge.htm>

As we committed, we have prepared this letter presenting the Federal Highway Administration's (FHWA) position relative to the history and complexities of the project and requesting that the Advisory Council on Historic Preservation (ACHP) comment on the FHWA determination to resolve adverse effects to the Amaknak Midden Site (49-UNL-050) in Dutch Harbor, Alaska. The site, located on Ounalashka Corporation property, will be adversely affected by the realignment of the Henry Swanson Drive intersection at Airport Beach Road in conjunction with the replacement of a structurally deficient bridge. Realignment of this intersection would improve driver safety by increasing sight distance.

A brief chronology is in order:



December 8, 1977 – U.S. Fish and Wildlife letter to the Keeper stating the Amaknak Bridge Site was eligible for inclusion in the National register of Historic Places, under criteria D. Site listed on register on January 21, 1978 by the Keeper.

January 10, 2001 – FHWA advised ACHP that the FHWA was pursuing the subject project and it would have an adverse impact on a cultural midden site eligible for the National Register.

February 1, 2001 – FHWA received letter from ACHP stating “Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, should circumstances change and you determine that our participation is required please notify us.”

March 23, 2003 - MOA and Data Recovery Plan (available at the website above) were circulated for signature and the MOA was executed.

April 29, 2003 - Signatory parties to the MOA are: FHWA and the Alaska State Historic Preservation Officer. Concurring parties are: Ounalashka Corporation (OC); Qawalangin Tribe of Unalaska (Tribe); Unalaska Historical Commission (UHC); and the Museum of the Aleutians (MA).

Excavation of approximately 1/3 of the site, by Dr. Richard Knecht, Museum of the Aleutians and Dr. Richard Davis, Bryn Mawr College, occurred during the summer of 2003. The Data Recovery Final Report was issued May 16, 2005. In the report, Dr. Knecht indicated, although excavation of the remainder of the site would be preferred [paraphrased], “A monitoring plan will be developed early in 2005. This plan will be followed during the earthmoving phase of the bridge realignment...Mechanized equipment would carry out most of the earthmoving and if it is done with enough control and diligence, important new information about the site can be recovered.” (Page 198, Amaknak Bridge Site Data Recovery Final Report, see Enclosure 2 compact disc)

Meetings were held in 2004 with the signatory parties of the MOA and all parties agreed that the Alaska Department of Transportation & Public Facilities (ADOT&PF) had fulfilled the stipulations of the MOA. The OC, Tribe, UHC, and MA expressed a desire to conduct additional excavation work, at Tribe and MA expense. The ADOT&PF agreed to move the construction back from 2005 to 2006, providing the concerned parties the opportunity to conduct the additional work. Neither party obtained funds, however, so no additional excavation occurred.

January 2006 – To effectively handle encounters with cultural materials during the midden removal for construction, it was decided that salvage archaeology, in advance of the archaeological monitoring would be more cost and time efficient. The Salvage Recovery Plan (as stipulated in the original MOA) was circulated by FHWA to the parties for approval.

From January 19<sup>th</sup> through March 2006 - Concurrence with the Salvage Recovery Plan was obtained from the Tribe, the OC, the MA, and SHPO. To date, UHC has not concurred.

March 8, 2006 - Dr. Knecht wrote a letter to the OC offering to complete the excavation, using volunteers and donating his time if lodging and food would be provided (see copy attached to Enclosure 3).

March 14, 2006 – The UHC sent a letter to OC requesting that they “seriously consider” Dr. Knecht’s proposal (see Enclosure 3). It is our understanding that some concerned individuals also requested the OC and the Tribe to take Dr. Knecht up on his offer. Reportedly, the group expressed concern that anything less than total excavation of the site was unacceptable because valuable information would be lost from a significant prehistoric settlement site.

March 15, 2006 - A public meeting was held in Dutch Harbor to present the proposed construction project and Salvage Recovery Plan and to receive input from the public on both (see Enclosure 4 for copies of handouts). Over fifty individuals attended the meeting. While there were several informal discussions with the public, there were no formal comments received from the attendees.

April 4 and April 5, 2006 – FHWA received letters from the Tribe and the OC supporting the proposed Salvage Recovery Plan (see Enclosures 5 & 6). The OC’s letter specifically reflected consideration of Dr. Knecht’s proposal.

April 7, 2006 – FHWA received an email copy of a letter from OC to UHC responding to their March 14, 2006 letter requesting consideration of Dr. Knecht’s proposal (see Enclosure 7). The OC letter reflects careful consideration of the proposal, but ultimately responds to UHC’s request by supporting the proposed Salvage Recovery Plan.

The Salvage Recovery Plan proposes to remove the midden material prior to the construction. The Plan establishes that material would be removed (in 10 cm deep lifts) with a backhoe (under supervision of an Archaeologist), placed on an OC property (currently under ROW negotiation between ADOT&PF and OC), and capped with vegetation. Once this is accomplished, the FHWA would have no further Section 106 obligation for the treatment or preservation of the material. The OC would retain full ownership of the material and manage it at their sole discretion.

The FHWA has reviewed and considered the comments of the Unalaska Historic Commission, the Qawalangin Tribe, the Ounnalashka Corporation, and the public. Based on the thoroughness of the Section 106 consultation process, the FHWA believes that the requirements of Section 106 have been accomplished in good faith and has determined that the implementation of the Salvage Recovery Plan will constitute satisfactory resolution of the adverse effects to 49-UNL-050. The FHWA requests that the ACHP comment on this determination.

For more information, please contact Mr. Dale J Lewis, Central Region Liaison Engineer, of our office at 907-586-7429.

Sincerely,



Karen A. Schmidt  
Assistant Division Administrator

Enclosures:

- Enclosure 1: Archeological Salvage Recovery Plan for the Amaknak Bridge Site (UNL-050)
- Enclosure 2: Compact Disc - Unalaska Amaknak Data Recovery Report June 2005
- Enclosure 3: Fax copy of letter from UHC to OC with attached letter from Dr. Knecht
- Enclosure 4: Unalaska: South Channel Bridge handouts for Public Meeting March 15, 2006
- Enclosure 5: Letter from Qawalangin Tribe of Unalaska to FHWA supporting Salvage Recovery Plan
- Enclosure 6: Letter from Ounalashka Corporation to FHWA supporting Salvage Recovery Plan
- Enclosure 7: Email copy of letter from Ounalashka Corporation to Unalaska Historic Preservation Commission explaining their decision to decline Dr. Knecht's offer and supporting Salvage Recovery Plan

cc: without enclosures

Judith Bittner, SHPO  
Wendy Svarny-Hawthorne, CEO, Ounalashka Corporation, P.O. Box 149, Unalaska, AK 99685  
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