



August 3, 2016

Judith Bittner, SHPO  
DNR/Division of Parks and Outdoor Recreation  
Office of History and Archaeology  
550 West 7th Avenue, Suite 1310  
Anchorage, Alaska 99501

RE: Joint Venture Construction Program (JVCP), New Health Clinic Construction, Yakutat Tlingit Tribe, Yakutat, Alaska

Thank you for your consultation on the new health clinic to be constructed in Yakutat, Alaska. Based upon your request for additional information, we were able to clarify the project scope with project management and have Roger Harritt (ANTHC) provide a supplemental review. Responses to your concerns are listed with reference to the numbered items listed in your letter dated June 28, 2016:

**1. Consideration of the effect on the Yakutat Landing Field (YAK-00072).**

The location of the proposed clinic was not developed in conjunction with installations and other built environment features associated with the WWII-related Yakutat Landing Field (YAK-00072), which has been deemed eligible, but not yet listed as an historic property on the NRHP. The effects of the proposed project on YAK-00117, 28<sup>th</sup> Engineer Road, will be restricted to installations of service lines for electricity and water/sewer services. Under these considerations, the construction proposed for the reviewed location will not affect historic resources located in the vicinity.

**2. Scope clarification:**

**a. *Demolition of existing buildings.***

No buildings will be demolished in conjunction as a result of the proposed project.

**b. *Ground-disturbing activities in previously undeveloped areas.***

The only ground-disturbing activity that will occur in previously undeveloped areas are within the site of the proposed clinic, which was reviewed under the original consultation.

**c. *Utility connections.***

Electrical and water/sewer service lines will be installed in the YAK-00117, 28<sup>th</sup> Engineer Road right-of-way. From the roadway alignment they will run directly westward to the new facility from the roadway. As the road is actively used and maintained in present day, there is no potential for the project to modify the substantive characteristics of this historic resource.

**d. *Use of a material source.***

Three borrow sites are proposed as material sources for this project. All of the proposed borrow sites have been previously developed or have had extensive prior ground disturbance (Figure 1, attached). Borrow location 'A' is located on the eastern side of Orca Avenue; the property is

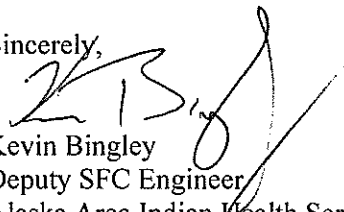
owned by the City of Yakutat and has been previously extensively disturbed as a result of excavations over a period of 20 years. Borrow location 'B' located on the north side of Airport Road is a previously developed material borrow that belongs to AK-TAT KWAAN, the Yakutat Native Corporation. Borrow location 'C', located some distance east of the project APE and east of Dangerous Ridge Road is also a previously developed borrow site owned by the City of Yakutat.

**3. Potential to affect previously unidentified archaeological resources.**

A number of surveys have been carried out in the YAK-00072 area including an extensive 2011 area wide paving project survey by Federal Highways Administration (FHWA) and a subsequent survey of the entirety of YAK-00072 by the OHA RSA unit. Components of the district contributing to the continued eligibility of the resources to the NRHP are identified as two runways and associated apron (YAK-00137), the Yakutat Hangar (YAK-00136), revetments, and taxiways (YAK-00140). None of these components are located in the APE of the proposed project. Based on these considerations, and insofar as no components of the historic district have been identified in the APE of the proposed project, it is reasonable to manage encounters with undocumented resources on a discovery basis. Under these conditions, in the event of encounters with buried cultural resources, project construction activities at the discovery location will be halted; a qualified historic preservation professional will evaluate the cultural remains and then we will enter into consultations with your office.

If you have any additional questions or concerns, then please contact me at (907) 223-7717  
kevin.bingley@ihs.gov.

Sincerely,



Kevin Bingley  
Deputy SFC Engineer  
Alaska Area Indian Health Service

Figure 1. Clinic project APE, identified by the red oval outline; material borrow sources are identified by the red rectangles.

