
St. George Environmental Assessment

Appendix E: NHPA Section 106 Documentation



St. George, Alaska



**US Army Corps
of Engineers**

Alaska District

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DEPARTMENT OF THE ARMY
ALASKA DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 6898
JBER, AK 99506-0898

Ms. Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

JUL 02 2018

Dear Ms. Bittner,

The United States Army Corps of Engineers (USACE), under the Civil Works (CW) Program, is planning to develop a harbor on the north side of Saint George Island, Pribilof Islands (Figure 1; Section 28, T41S, R129W, USGS Pribilof Islands A-3, Seward Meridian). The project is being conducted in conjunction with the City of St. George under Section 107 of the 1960 River and Harbor Act, as amended, which “allows the USACE to study, plan, and construct small navigations projects such as boat harbors.” In compliance with Section 106 of the National Historic Preservation Act of 1966 [36 CFR § 800.2(a)(4)], the purpose of this letter is to notify you of a Federal undertaking and to seek your concurrence on an assessment of effect.

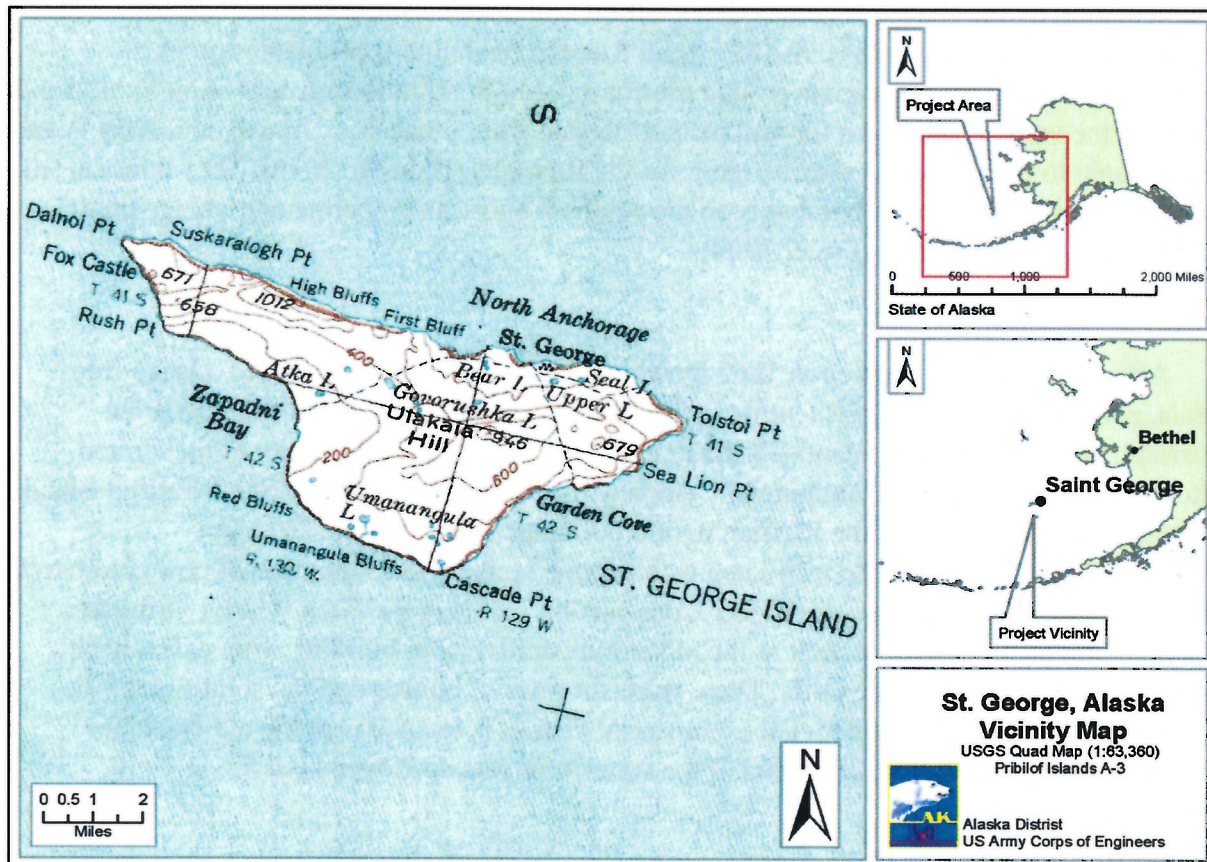


Figure 1: Project area is at the City of St. George on the northern side of the island.

Context

Russian Period

Saint George Island is part of the Pribilof Island group located in the Bering Sea, approximately 250 miles north of the Islands of Four Mountains in the Aleutian archipelago and 300 miles west of the mainland of Alaska. Russian fur-hunting crews had actively sought these island since at least 1768, as they knew that the northern fur seals (*Callorhinus ursinus*) they had observed and hunted in the passes of the eastern Aleutians must have breeding grounds somewhere to the north. On June 25, 1786, St. George Island was discovered by the crew of *Sv. Georgii Pobedonosets* (*St. George the Victorious*), commanded by Gavriil Loginovich Pribylov of the Lebedev-Lastochkin Company. Upon finding no safe harbor, Pribylov left a party of 40 men to winter there and returned to Unalaska Island for supplies. While the crew was on Saint George, they spotted another island to the northwest. Once Pribylov returned the following summer, they sailed to this new island and named it Saint Peter and Saint Paul Island for the Saints' day on which they landed. This island's name has since been shorted to Saint Paul Island (Eldridge 2016).

Although the Pribilof Islands were uninhabited when the *St. George the Victorious* arrived, Unangan oral history holds that they had known of these island for some time before their documentation by the Russians (Black 2004; Elliott 1882; Jochelson 2003; Osgood et al. 1915; Torrey 1980; Veniaminov 1984). In 1787, rival Russian fur-hunting companies quickly established seasonal sealing camps around the coasts of both Saint George and Saint Paul Islands to harvest the valuable northern fur seal pelts. Unangan from Unalaska, Umnak, and Atka Islands were brought to the islands to provide labor for the Russians (Eldridge 2016). They constructed traditional semi-subterranean barabaras on the southern shore and a permanent village on the north of Saint George Island (Etnier 2004).

Alaska Territory Period

After the Treaty of Cession in 1867 by which the United States purchased Alaska from Russia, administrators and management from the Alaska Commercial Company became the governing authorities on the island (Faulkner *et al.* 1987). Under the authority of the United States Treasury, the Alaska Commercial Company took over operations on Saint George Island. The company razed many of the Russian period buildings, including the Unangan semisubterranean houses, and constructed wood-frame housing and a number of new commercial buildings on the north shore of the island. Construction included the Great Martyr Orthodox Church, completed in 1936, as well as the old administrative core building with staff housing overlooking the dock from the cliffs. There were six rows of houses that ran southeast of the church, with a community center. The commercial district is located near the old dock and consists of fourteen buildings. Portions of the waterfront was destroyed by a fire in 1950 (Faulkner *et al.* 1987).

Treatment of the local Unangan population also changed with the advent of the Alaska Commercial Company's control of St. George. From Cession to the U.S. involvement in World War II, the Company changed its treatment and attitudes toward the Unangan workforce from

what could be considered a reasonably paid citizen of the United States to a form of servitude, where wages, lifestyle, and conditions were all controlled by the Company. These conditions persisted and then deteriorated even more during World War II when the Pribilof Islands were evacuated and the population was sent to Southeast Alaska for the duration of the war. On June 14, 1942, the residents of St. George were ordered to pack their belongings for evacuation of the island due to threat of Japanese attack. On June 16, 1942, 294 Unangan and 15 non-Unangan U.S. Fish & Wildlife Service employees were evacuated from St. George aboard the U.S. Army Transport (*U.S.A.T. Delarof*) (Commission 1983). As a result of a hasty evacuation, many personal belongings and government property was left on the island (Jones 1980; Torrey 1980).

Project Description

St. George's southern breakwater is eroding affecting the usability of the harbor, as a result storms have been causing damage to vessels in the harbor. The USACE is proposing to construct a new harbor that would replace the existing remains of the historic north harbor. Construction would involve deepening the existing bay and developing a breakwater to protect it from the weather. Plans also include a small boat pull-out protected from the breakwater, and a temporary footpad for the project along the northern shoreline directly to the east of the project area. As a cost-effective solution to the failing southern breakwater harbor, this project would significantly increase operational use of the harbor throughout the year. The benefits of this development also include increasing public health and safety, increasing access to subsistence resources, alleviating economic stresses on the community, and protecting social and cultural values in the community.

Initial review of the Alaska Heritage Resources Survey (AHRS) concluded that the construction would involve removing or covering two existing cultural resources, two "buildings" which are actually docks listed as XPI-194 and XPI-195. All current design proposals for the harbor would involve building a breakwater over site XPI-194, as well as the construction of a small boat pullout at the site XPI-195 (Figure 2).



Figure 2: Proposed APE for the northern harbor in the orange polygon, XPI-194 and XPI-195 circled in green.

Historic Properties

Saint George Island has a number of known cultural resources. These are associated with both the Russian and American fur trades; a large portion of the northern shore has been registered as a National Historic Landmark (NHL). The Seal Islands Historic District NHL (XPI-002) occupies both Saint Paul Island and Saint George Island (Figure 3). In total, there are 68 known sites and one NHL listed in the Alaska Heritage Resources Survey (AHRS) within the boundaries of the City of St. George; the vast majority of the resources being associated “buildings” to the Seal Island Historic District NHL (Tables 1 and 2).



Figure 3: Seal Islands Historic District NHL on Saint George Island (AHRS 2018).

In its entirety, the Seal Islands Historic District NHL includes 106 contributing buildings, two contributing structures, 12 historic sites (the northern fur seal rookeries) and nine archaeological sites. The NHL consists of a combination of Russian-era buildings and structures that were not destroyed by the Alaska Commercial Company, as well as American structures, of which many replaced Russian buildings to allow for continued seal harvesting into the 20th century. Of the 68 identified sites on the AHRS, only four sites in addition to the NHL have a specific site name and any DOEs conducted for them (Table 1). There are 65 contributing “buildings” within the NHL that are in the vicinity of the APE; however, they have not been adequately described or evaluated for their eligibility to the National Register of Historic Places (NRHP) (Table 2).

Table 1: Prominent known cultural resources in the general vicinity of the APE (AHRS 2018).

Site Number	Site Name	NRHP Status	In APE
XPI-002	Seal Islands Historic District	NHL	Yes
XPI-004	Great Martyr Orthodox Church	Listed on the Register	No
XPI-018	St. George Seal Skin Plant	Eligible	No
XPI-019	St. George Cottage	Unknown	No
XPI-116	St. George School	Not Eligible	No

Table 2: List of sites within the NHL in the general vicinity of the APE.

Site Number	Site Type	NRHP Status	In APE
XPI-089	Building	Unknown	No
XPI-090	Building	Unknown	No
XPI-091	Building	Unknown	No
XPI-092	Building	Unknown	No
XPI-093	Building	Unknown	No
XPI-094	Building	Unknown	No
XPI-095	Building	Unknown	No
XPI-096	Building	Unknown	No
XPI-097	Building	Unknown	No
XPI-098	Building	Unknown	No
XPI-099	Building	Unknown	No
XPI-100	Building	Unknown	No
XPI-101	Building	Unknown	No
XPI-102	Building	Unknown	No
XPI-103	Building	Unknown	No
XPI-104	Building	Unknown	No
XPI-105	Building	Unknown	No
XPI-106	Building	Unknown	No
XPI-107	Building	Unknown	No
XPI-108	Building	Unknown	No
XPI-109	Building	Unknown	No
XPI-110	Building	Unknown	No
XPI-111	Building	Unknown	No
XPI-112	Building	Unknown	No
XPI-113	Building	Unknown	No
XPI-114	Building	Unknown	No
XPI-115	Building	Unknown	No
XPI-117	Building	Unknown	No
XPI-118	Building	Unknown	No
XPI-119	Building	Unknown	No
XPI-120	Building	Unknown	No
XPI-121	Building	Unknown	No
XPI-122	Building	Unknown	No
XPI-123	Building	Unknown	No
XPI-124	Building	Unknown	No
XPI-125	Building	Unknown	No
XPI-126	Building	Unknown	No
XPI-127	Building	Unknown	No
XPI-128	Building	Unknown	No
XPI-129	Building	Unknown	No
XPI-130	Building	Unknown	No
XPI-131	Building	Unknown	No
XPI-133	Building	Unknown	No

XPI-134	Building	Unknown	No
XPI-135	Building	Unknown	No
XPI-136	Building	Unknown	No
XPI-144	Building	Unknown	No
XPI-145	Building	Unknown	No
XPI-146	Building	Unknown	No
XPI-147	Building	Unknown	No
XPI-193	Building	Unknown	No
XPI-194	Building (Large Dock)	Unknown	Yes
XPI-195	Building (Small Dock)	Unknown	Yes
XPI-196	Building	Unknown	No
XPI-197	Building	Unknown	No
XPI-198	Building	Unknown	No
XPI-199	Building	Unknown	No
XPI-200	Building	Unknown	No
XPI-202	Building	Unknown	No
XPI-203	Building	Unknown	No
XPI-204	Building	Unknown	No
XPI-205	Building	Unknown	No
XPI-206	Building	Unknown	No
XPI-207	Building	Unknown	No

Prior to the development of the harbor at Zapadni Bay on the southern shore in 1984, St. George relied on the old docks (XPI-194, XPI-195) located on the north shore at the bight on the west side of town. All commercial activities, subsistence activities, and transportation, including transferring seal and fox pelts, were conducted off of these docks (Isto 2012). While still in use until the Zapadni Bay harbor’s construction, the old docks (XPI-195) remained significantly dangerous due to unsatisfactory environmental conditions (Figures 4 and 5). Eliot’s (1881:16) description of the harbor at St. George paint a bleak and dangerous picture of the area:

“Lack of Harbors: Anchorages. – The total absence of a harbor at the Pribylov islands is much to be regretted... At St. George matters are still worse, for the prevailing northerly, westerly, and easterly winds drive the boats away from the village roadstead, and weeks often pass at either island, but more frequently at the latter, ere a cargo is landed at its destination. Under the very best of circumstances, it is both hazardous and trying to load and unload ship at any of these places... At St. George, however, the bold, abrupt, bluff coast everywhere all around, with its circling girdle of flying water-birds far out to sea, looms up quite prominently, even in the fog; or, in other words, the navigator can notice it before he is hard aground or struggling to haul to windward from the breakers under his lee. There are no reefs making out from St. George worthy of notice... At St. George the steamer comes, wind permitting, directly to the village on the north shore, close in, and finds her anchorage in ten fathoms of water, in poor holding-ground; but it is only when three or four days have passed free from northerly, westerly, or easterly winds, that she can make the first attempt to safely unload. The landing here is a very bad one, surf

breaking most violently upon the rocks from one end of the year to the other (Elliot 1881:16).”



Figure 4: View of the dock (XPI-194) at St. George looking northwest.



Figure 5: XPI-195 in view from the bluffs to the southwest. Rocky shoreline continues out with the structure.

There are a number of shipwrecks in the immediate vicinity of Saint George Island that correspond with Elliot’s description of the navigation dangers. While the National Oceanic and Atmospheric Agency’s (NOAA) shipwreck map is absent of nearby wrecks, the Bureau of Ocean Energy Management (BOEM) lists a number of shipwrecks associated with Saint George Island (BOEM 2011; NOAA 2018). These include the Russian ship the Sv. Ioann Pretecha, which is noted to have shipwrecked in 1792 “on the island.” The Maweema sunk in 1915, five miles from St. George village, however no direction is given. The Amatuli sunk 45 miles off Saint George Island in 1987, and the Belair sunk in 1994 on the south side of the island. There is also the steamer known as the *Laurada*, which wrecked off “Zapadni Point” of St. George in 1899. However, there is no Zapadni Point on St. George; likely there is an error in the BOEM database and it is located at the Zapadni Point on St. Paul Island. If the shipwreck is in Zapadni Bay, that is located on the southern shore of St. George and outside the APE and NHL (BOEM 2011). In August 2018, the USACE is planning on having members from the Environmental Resource team to conduct an underwater survey of the north harbor area. While the primary purpose of this survey is for collecting underwater environmental data, the archaeologist will have access to the ROV, and will do a survey of the APE for any sunken cultural resources which have not been identified by BOEM or NOAA.

A second, smaller dock (XPI-195), was identified directly south of XPI-194. XPI-195 does not extend out into the bight, but instead sticks next to the shoreline. The historic purpose of this second dock is unknown; however, it would have required boats with small drafts (Figures 4 and 5). Assumptions can be made that it either was a secondary dock, or possibly part of the processing stations for seal and fish to allow disposal into the bay.



Figure 4: View of St. George Village from XPI-194. The smaller dock, XPI-195 is on the right in the orange outline.



Figure 7: A closer view of XPI-195. The base of a small crane is on the right side.



Figure 8: Historic photo of the small dock (XPI-195), date unknown, catalog number RG22-95-ADMC-2863 (NARA 2018).

Assessment of Effect


Two known cultural resources will be directly affected by the proposed undertaking (XPI-194 and XPI-195). These two docks are both listed in the AHRS as contributing features to the Seal Islands Historic District NHL (XPI-002), but remain unevaluated individually for listing on the National Register of Historic Places (NRHP). The proposed project will have an **Adverse Effect** on XPI-194 and XPI-195, as defined by 36 CFR § 800.5(a)(1) adverse effects occur:

When an undertaking may alter, directly or indirectly, and 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. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be further removed in distance or be cumulative.

Conclusion

The proposed breakwater will be constructed on top of XPI-194, and it is likely that the city will construct a small boat ramp at XPI-195. A Memorandum of Agreement is anticipated; please expect an invitation to participate per 36 CFR § 800.6(a) in the near future. The lead time required for awarding contracts and coordinating planning documents in advance of the actual field work for this undertaking is significant. Importantly, the historic value within a NHL creates added challenges per 36 CFR § 65.2(c)(2), which require "the responsible Federal agency to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." The USACE has determined the proposed undertaking will have an **Adverse Effect** on local cultural resources, per 36 CFR § 800.5(d)(2). If you have any questions about this project, please contact me by phone at 907.753.2640, or by email at joseph.e.sparaga@usace.army.mil.

Sincerely,



Joseph E. Sparaga
Archaeologist
Environmental Resources

Cc:

Thomas Mack, President & CEO of Aleut Corporation

Dimitri Philemonof, President & CEO of Aleutian Pribilof Islands Association, Incorporated

Christopher Mercurief, President of Saint George Traditional Council

Nathan McCowan, President of St. George Tanaq Corporation

Patrick Pletnikoff, Mayor of City of St. George

Larry Cotter, CEO of Aleutian Pribilof Island Community Development Association

References

- Alaska Heritage Resources Survey (AHRS)
2018 Alaska State Office of History and Archaeology (OHA) database.
- Black, Lydia
2004. *Russians in Alaska: 1732-1867*. University of Alaska Press, Fairbanks.
- Bureau of Ocean Energy Management
2011 Shipwrecks of Alaska's Coast. Electronic Document,
https://www.boem.gov/uploadedFiles/BOEM/About_BOEM/BOEM_Regions/Alaska_Region/Ships/2011_Shipwreck.pdf, accessed 6/19/2018.
- Commission on Wartime Relocation and Internment of Civilians (Commission)
1983 Personal Justice Denied. Part II: The Aleuts. Electronic document,
<https://www.archives.gov/research/japanese-americans/justice-denied>, accessed March 01, 2018.
- Eldridge, Kelly A.
2016. An Analysis of Archaeofauna Recovered from a Russian Period Camp on St. Paul Island, Pribilof Islands, Alaska. *Arctic Anthropology* Vol. 53(2):33-51.
- Elliot, Henry Wood
1881 *The Seal-Islands of Alaska*. Government Printing Office, Washington D.C.
1882.
- Etnier, Michael
2004. 2004. Evaluation of Staraya Artil Paleontological and Archaeological Resources: Progress Report and Recommendations for Further Study. St. George Traditional Council.
- Faulkner, Sandra McDermott, William S. Hanable, and Robert L. S. Spude.
1987. *Russia America Theme: National Historic Landmarks*. U.S. Department of the Interior. Anchorage: National Park Service, Alaska Region.
- Jochelson, Waldemar
2003 [1931]. *History, Ethnology and Anthropology of the Aleut*. University of Utah Press, Salt Lake City.
- Jones, Dorothy Knee
1980 *A Century of Servitude: Pribilof Aleuts Under U.S. Rule*. University Press of America, Inc., Washington D.C.
- Khlebnikov, Kiril Timofeevich
1994 *Notes on Russian America: Parts II-V: Kad'iak, Unalashka, Atkha, the Pribylovs*. Translated by Marina Ramsay. The Limestone Press, Fairbanks.
- National Archives and Records Administration (NARA)
2018 No. 345 St. George Dock, ARC Identifier 1656105. *Photographs of Social and Economic Life, Environmental Conditions and Cleanup Operations on the Pribilof Islands, Alaska*. Electronic file, <https://aad.archives.gov/aad/record-detail.jsp?dt=2312&mtch=582&tf=I&q=St.+George&bc=&rpp=10&pg=1&rid=1596&rlst=1055,1248,1249,1251,1259,1261,1518,1592,1595,1596>, Accessed 6/20/2018.
- National Oceanic and Atmospheric Administration (NOAA)
2018 Wrecks and Obstructions Database. Electronic Document,
<https://nauticalcharts.noaa.gov/data/wrecks-and-obstructions.html>, accessed 6/19/2018.
- Osgood, Wilfred Hudson, Edward Alsexander Preble, George Howard Parker, and Rose Mortimer Ellzey macDonald

1915. *The Fur Seals and Other Life of the Pribilof Islands, Alaska, in 1914*. Government Printing Office, Washington D.C.

Torrey, Barbara Boyle

1963 *Slaves of the Harvest*. Tanadgusix Corporation, Anchorage.

Veltre, Douglas W. and Mary J. Veltre

1987 The Northern Fur Seal: A Subsistence and Commerical Resource for Aleuts of the Aleutian and Pribilof Islands, Alaska. In *Études/Inuit/Studies* Vol. 11(2):51-72.

Veniaminov, I.

1984 [1840]. *Notes on the Islands of the Unalaska District*. Translated by L. Black and R. H. Geoghegan, edited by R.A. Pierce. Limestone Press, Kingston.



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources

DIVISION OF PARKS & OUTDOOR RECREATION
Office of History & Archaeology

550 West 7th Ave., Suite 1310
Anchorage, Alaska 99501-3565
Main 907.269.8721
<http://dnr.alaska.gov/parks/oha>

August 1, 2018

File No.: 3130-1R COE / 2018-0831

Joseph E. Sparaga
U.S. Army Corps of Engineers
Alaska District CEPOA-PM-C-ER
P.O. Box 6898
JBER, AK 99506-0898

Subject: St. George Harbor Project

Dear Mr. Sparaga:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence concerning the subject project on July 5, 2018. Our office has reviewed the undertaking pursuant Section 106 of the National Historic Preservation Act and offer the following comments for your consideration.

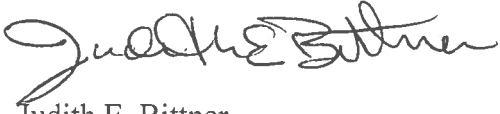
A proposed area of potential effects (APE) was presented in Figure 2, but was not accompanied by a discussion of what components of the project are encompassed by the APE or what types of effects were taken into account with the proposed APE. Common project elements discussed in a project description and/or APE section include material sources, laydown areas, construction camps, and access routes. Our office is uncertain whether these aspects of the project are included in the APE as they were not discussed and welcome additional information in the future. We are also concerned about effects the project may have on the Seal Islands Historic District National Historic Landmark (NHL) and request USACE consider broadening the APE to include potential indirect and cumulative effects the project may have on the NHL.

USACE identified three known cultural resources within the APE: the NHL (XPI-00002), a Large Dock (XPI-00194), and a Small Dock (XPI-00195). The NHL is split between St. Paul and St. George Islands and it is our office's understanding that a project to re-examine the contributing features and integrity of the St. George portion of the NHL was initiated, but never completed. The information reported to the AHRS from this project, including XPI-00194 and XPI-00195, is minimal and only states that the resources are within the boundary of the NHL. Given what is known about the docks, they are associated with fur seal industry and could be contributing features to the NHL, but they were not mentioned in the nomination and our office does not have on file any record of a formal evaluation of their eligibility status, even as contributing elements to the NHL. Our office encourages USACE to formally evaluate XPI-00194 and XPI-00195 for National Register of Historic Places eligibility, as well as evaluating their ability to contribute to the NHL.

Our office concurs that an agreement document should developed to implement and/or resolve effects for the St. George Harbor project. As the project is in the early development stages and there are a number of unknowns, we recommend that USACE consider a programmatic agreement rather than a memorandum of agreement (MOA). For a MOA to move forward, we would either need to agree that the project will have an adverse effect on the NHL or agree to defer formal evaluations for XPI-00194 and XPI-00195 and treat them as eligible for the purposes of this project.

Thank you for the opportunity to comment and we look forward to continued consultation concerning the project. Please contact Sarah Meitl at 269-8720 or sarah.meitl@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith E. Bittner". The signature is written in a cursive, flowing style.

Judith E. Bittner
State Historic Preservation Officer

JEB:sjm



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
I.B. (AKRO-CR)
August 6, 2018

VIA ELECTRONIC MAIL – NO HARD COPY TO FOLLOW

Joseph E. Sparaga
Department of the Army
Alaska District, U.S. Army Corps of Engineers
P.O. Box 6898
JBER, AK 99506-0898

Subject: St. George Harbor Development

Dear Mr. Sparaga:

Thank you for providing us with a copy of your July 2, 2018 letter to the Alaska State Historic Preservation Officer, on July 30th, regarding the United States Army Corps of Engineers (USACE) plan to develop a harbor on the north side of Saint George Island, Pribilof Islands.

The National Park Service (NPS) administers the National Historic Landmarks (NHL) program for the Secretary of the Interior. Federal agencies undertaking a project within a NHL must be in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. The project is located within the boundaries of the Seal Islands NHL, with historic districts on both St. George and St. Paul islands. The NPS serves as an interested party throughout the Section 106 process to ensure the integrity of the NHL.

We look forward to continued consultation with USACE, including additional information about AHR Site numbers XPI-00194 and XPI-00195, as well as consulting during the development of an agreement document to mitigate the adverse effects of the project. Janet Clemens, Historian, will continue to serve as NPS contact for this Section 106 review and is available at 907-644-3461 or janet_clemens@nps.gov.

Sincerely,

Jennifer Pederson Weinberger
Cultural Resources Program Manager

cc: Sarah Meitl, Review & Compliance Coordinator, AK State Historic Preservation Office
(sarah.meitl@alaska.gov)

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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ALASKA DISTRICT
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Ms. Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

MAR 25 2019

Dear Ms. Bittner,

The U.S. Army Corps of Engineers (USACE), under the Civil Works (CW) Program, is in the planning phase of a Feasibility Study to construct a small boat harbor on St. George Island, Alaska. The project is being conducted in conjunction with the City of St. George under Section 107 of the 1960 Rivers and Harbor Act, as amended, which allows the USACE to study, plan, and construct small navigations projects such as boat harbors. The enclosed document is a report of an archaeological survey conducted by a USACE archaeologist, and which includes the evaluation of two cultural resources within the proposed Area of Potential Effect (APE) for their eligibility for the National Register of Historic Places. The report concludes that both St. George Outside Landing (XPI-194) and St. George Inside Landing (XPI 195) were found **eligible** for inclusion on the National Register under **Criterion A**.

The USACE submitted a finding of adverse effect in a previous assessment letter submitted on July 2 (USACE 2018). Your office responded on August 1, that the re-examination of the contributing features to the NHL was never completed, and that there is insufficient information regarding on XPI-194 and XPI-195 (SHPO 2018). Your office recommended considering a programmatic agreement, or that a memorandum of agreement (MOA) would either need our offices to agree on adverse effect or to defer formal evaluations for XPI-194 and XPI-195 and treat the sites as eligible (SHPO 2018). USACE determined to evaluate the two properties for the purposes of the project. The results of the survey, as stated previously, found both sites eligible under Criterion A; per the USACE's 2018 finding of effect (USACE 2018), and following 36 CFR § 800.5(d)(2), the USACE seeks your concurrence on the determination that the proposed undertaking will result in an **adverse effect** on historic properties, and with a more developed project footprint (Attached 1), believe that an MOA would be the appropriate path forward if your office concurs with our finding. If you have any questions about this project, please contact Joseph Sparaga by phone at 907-753-2640, or by email at joseph.e.sparaga@usace.army.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Sparaga", written over a white background.

Joseph E. Sparaga
Archaeologist
Environmental Resources Section

References

State Historic Preservation Office (SHPO)

2018. Letter to USACE (Joseph Sparaga) from SHPO (Judith Bittner) re: CW St. George Harbor Project. August 1, 2018.

United States Army Corps of Engineers (USACE)

2018. Letter to SHPO (Judith Bittner) from USACE (Joseph Sparaga): re: St. George Harbor Project Letter of Assessment. July 2, 2018.



®

**US Army Corps
of Engineers**

Alaska District

**Civil Works Program
Site Investigation and
Survey Results**

**Cultural Resources Survey of the
St. George Outside Landing (XPI-194) and the St.
George Inside Landing (XPI-195) within the
Seal Rookeries National Historic District,
St. George, Alaska**



February 2019

Statement of Confidentiality

To protect fragile, vulnerable, or threatened cultural sites from disturbance, access to site-specific information from the Alaska Heritage Resources Survey is restricted or confidential. Distribution of those portions of this report that identify the location of cultural resources is to be limited to those with a legitimate need to know, such as appropriate personnel from the U.S. Army Corps of Engineers, Alaska State Historic Preservation Office, tribal entities, and other authorized researchers. Restricted or confidential information is withheld from public records disclosure per Alaska state law (AS 40.25.110) and the Federal Freedom of Information Act (PL 89-554). Information about site inventory may be restricted pursuant to AS 40.25.120(a)(4), Alaska State Parks Policy and Procedure No. 50200, the National Historic Preservation Act (PL 89-665; 54 USC 300101), and the Archaeological Resources Protection Act (PL 96-95)."

Executive Summary

This report describes the results of a cultural resources survey associated with the St. George Navigation Improvements Feasibility Study for a small boat harbor on Saint George Island, Alaska. The proposed small boat harbor would directly impact two contributing features of the Seal Islands National Historic Landmark (NHL): the St. George Outside Landing (XPI-194) and the St. George Inside Landing (XPI-195). A U.S. Army Corps of Engineers (USACE), Alaska District archaeologist conducted a pedestrian survey of the two landings in August 2018. The sites are in close proximity to each other on the northwest shoreline of the city of St. George. The purpose of the survey was to document the current conditions of these two contributing features of the NHL and assess the potential effects of the proposed undertakings on historic properties.

The eligibility of the St. George Outside and Inside Landings for the National Register of Historic Places (NRHP) was evaluated as a result of the survey. While both sites have lost significant physical integrity due to time, use, and weathering, as integral structures of the fur seal industry operating out of Saint George Island they are both significant under National Register Criterion A and retain sufficient integrity to be eligible for listing on the NRHP. The USACE has determined that the St. George Outside Landing (XPI-194) **is eligible for the NRHP under Criterion A** and the St. George Inside Landing (XPI-194) **is eligible for the NRHP under Criterion A**. This report has been prepared to support project planning and provide relevant cultural resources documentation for future undertakings.

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1.0 Introduction

Saint George Island is part of the Pribilof Island group located within the Bering Sea, 45 miles southeast of Saint Paul Island, and 220 miles northwest of Unalaska Island (Figure 1). The community of St. George, located on the northern side of the island, has been occupied since the Russians relocated Unangax̂ hunters to the island in the late 18th century to hunt and process fur seals. By the 1820s, St. George was the only permanent settlement on the island. Historically, the primary economy on the island was based off of the fur seal industry; the community also subsisted off of seal meat as a primary food source. Due to the nature of the industry, all structures associated with maritime transport played a significant role. The community of St. George relied on the harbor for its economy, subsistence, and communication with the rest of the world.

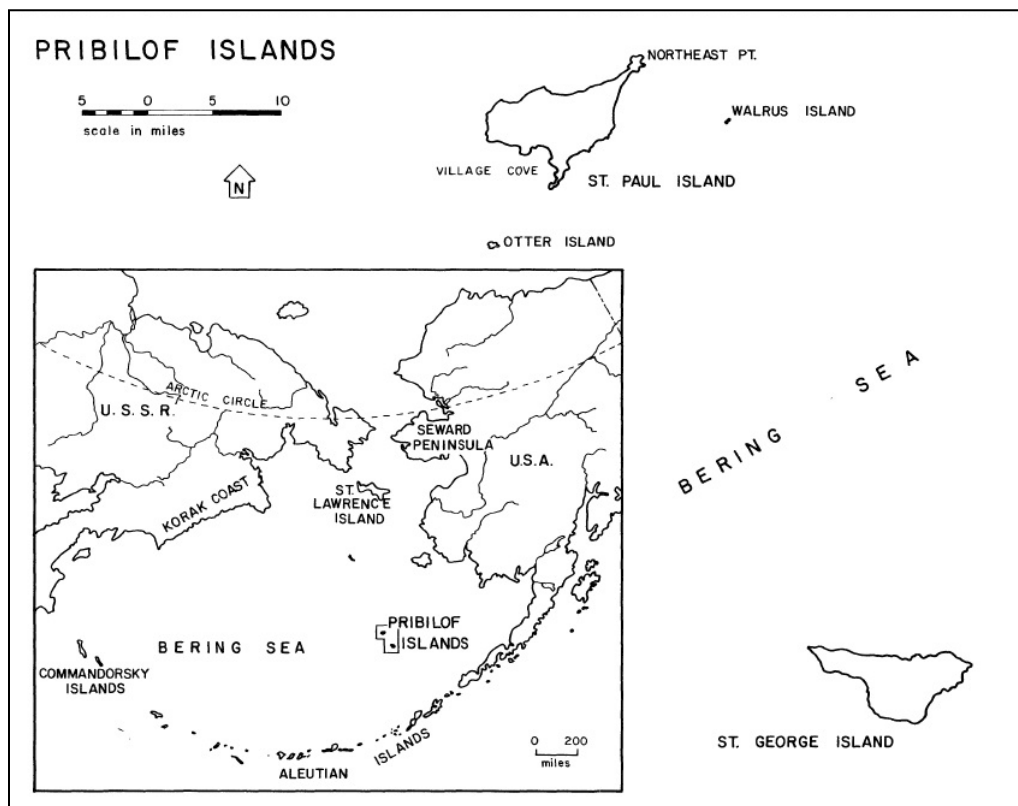


Figure 1. The Pribilof Islands in relation to the State of Alaska, the Aleutian Islands, and Russia (Faulkner 1986:40).

The City of St. George originally had two docks located along its northwestern shoreline (Figure 2). These docks were the primary artery for the community until a harbor was constructed at Zapadni Bay on the southern shore in 1984 (Figure 3). In 1988, large sections of the northern shore of Saint George was nominated for the National Register for Historic Places (NRHP) as the Seal Islands National Historic Landmark (NHL) for its period of significance from 1786-1959 (Faulkner 1986). The entire community of St. George was subsumed within this designated NHL and, as such, many of the buildings and structures are considered to be contributing features to the landmark.



Figure 2. The two historic docks at St. George. The St. George Outside Landing (XPI-195) is stretching out into the Bearing Sea, while the Inside Landing (XPI-194) is the square feature along the shore upon which USACE personnel is standing.

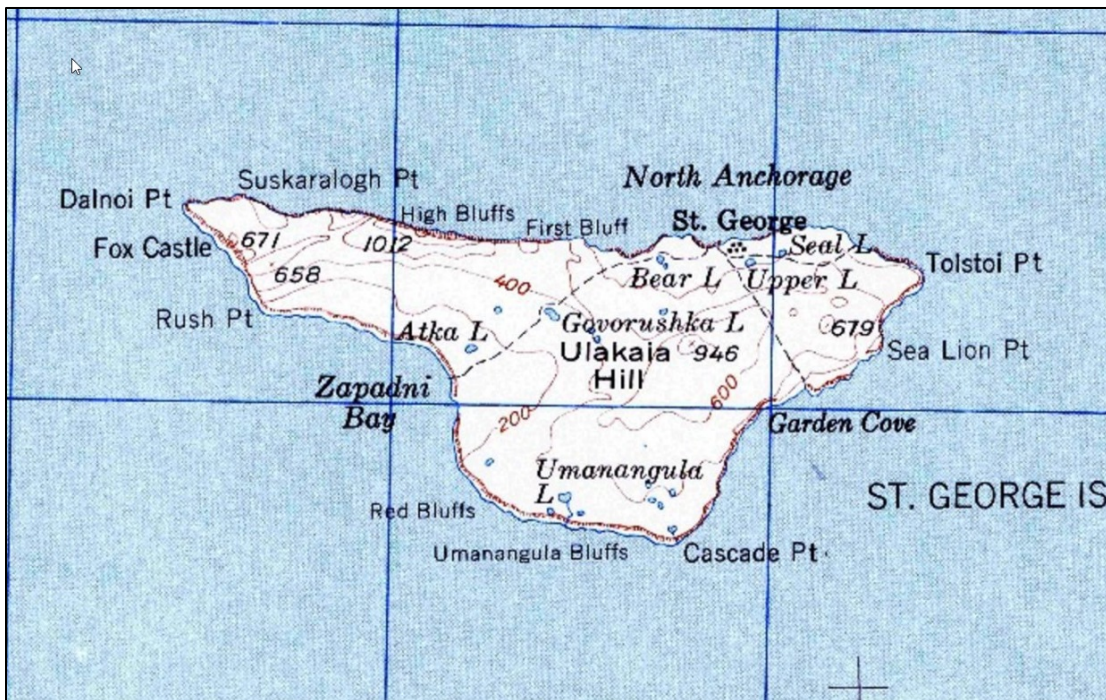


Figure 3. USGS map of Saint George Island. The city of St. George is in the northeast, while Zapadni Bay is to the southwest.

2.0 Historical Context

2.1 Russian Period

Saint George Island is part of the Pribilof Island group located in the Bering Sea, approximately 250 miles north of the Islands of Four Mountains in the Aleutian archipelago and 300 miles west of the mainland of Alaska. Russian fur-hunting crews, known as *promyshlenniki*, had actively sought these island since at least 1768, as they knew that the northern fur seals (*Callorhinus ursinus*) they had observed and hunted in the eastern Aleutians must have breeding grounds somewhere to the north. On June 25, 1786, St. George Island was discovered by the crew of *Sv. Georgii Pobedonosets (St. George the Victorious)*, commanded by Gavriil Loginovich Pribylov of the Lebedev-Lastochkin Company. Upon finding no safe harbor, Pribylov left a party of 40 men to winter there and returned to Unalaska Island for supplies. While the crew was on Saint George, they spotted another island to the northwest. Once Pribylov returned the following summer, they sailed to this new island and named it Saint Peter and Saint Paul Island. This name has since been shorted to Saint Paul Island (Eldridge 2016).

Although the Pribilof Islands were uninhabited when the *St. George the Victorious* arrived, Unangan oral history holds that they had known of these island for some time before their documentation by the Russians (Black 2004; Elliott 1881; Jochelson 2003; Osgood et al. 1915; Torrey 1980; Veniaminov 1984). In 1787, rival Russian fur-hunting companies quickly established seasonal sealing camps around the coasts of both Saint George and Saint Paul Islands to harvest the valuable northern fur seal pelts. Unanga^â from Unalaska, Umnak, and Atka Islands were brought to the islands to provide labor for the Russians (Eldridge 2016). They constructed traditional semi-subterranean barabaras near the shores of easily accessible areas along the southeastern shore near Garden cove, and southwestern shore of Zapadni Bay, but ended up developing a permanent village on the north of Saint George Island (Etnier 2004; NOAA 2010a).

2.2 American Period

After the Treaty of Cession in 1867 by which the United States purchased Alaska from Russia, administrators and management from the Alaska Commercial Company became the governing authorities on the island. Under the authority of the United States Treasury, the Alaska Commercial Company took over the fur seal harvesting operations on Saint George Island (Figure 4). The company razed many of the Russian-period buildings, including the Unanga^â barabaras, and constructed wood-frame housing and a number of new commercial buildings on the north shore of the island. Construction included the Great Martyr Orthodox Church, completed in 1936, as well as the administrative core building with staff housing overlooking the dock from the cliffs. There were six rows of houses that ran southeast of the church, with a community center. The commercial district is located near the old dock and consists of fourteen buildings. Portions of the waterfront were destroyed by a fire in 1950 (Faulkner *et al.* 1987).



Figure 4. Processed seal skins in barrels, waiting to be loaded onto the Navy transport USS *Thuban* in 1948 (Alaska Digital Archives UAF-1970-11-100).

Treatment of the local Unanga^â population also changed when the Alaska Commercial Company (ACC) assumed control of St. George. From the Treaty of Cession to the U.S. involvement in World War II, the ACC changed its management and attitudes toward the Unanga^â workforce from what could be considered a reasonably paid citizen of the United States to a form of servitude, where wages, lifestyle, and conditions were all controlled by ACC. These conditions persisted and then deteriorated even more during World War II when the Pribilof Islands were evacuated and the population was sent to Southeast Alaska for the duration of the war. On June 14, 1942, the residents of St. George were ordered to pack their belongings for evacuation of the island due to threat of Japanese attack. On June 16, 1942, 294 Unanga^â and 15 non-Unanga^â U.S. Fish & Wildlife Service employees were evacuated from St. George aboard the U.S. Army Transport (USAT) *Delarof* (Commission 1983). As a result of a hasty evacuation, many personal belongings and government property was left on the island (Jones 1980; Torrey 1980).

The Unanga^â populations from the Pribilof Islands were not housed with other displaced Aleutian communities during the World War II Aleutian Campaign. Instead, the Unanga^â from St. George and St. Paul were sent to an abandoned cannery and mine camp at Funter Bay. After they were allowed to return to St. George Island, the communities successfully pushed the U.S.

Congress to pass the Aleut Restitution Act of 1988, which recognized the government’s fault in the treatment of the Unanga in their internment camps. In 1973, the U.S. Congress passed the Fur Seal Act Amendments, which ended industrial seal harvesting in the Pribilof Islands. Since that time, residents have pursued commercial fishing and tourism, while relying on an allotted subsistence catch of fur seals (NOAA 2010b).

3.0 Historic Properties

Saint George Island has a number of known cultural resources. These are associated with both the Russian and American fur trades; a large portion of the northern shore of Saint George has been registered as a National Historic Landmark (NHL; Figure 5). The Seal Islands Historic District NHL (XPI-002) is located on both Saint Paul and Saint George Islands. In its entirety, the Seal Islands Historic District NHL includes 106 contributing buildings, two contributing structures, 12 historic sites, and nine archaeological sites. There are 68 known cultural resources and one NHL listed in the Alaska Heritage Resources Survey (AHRs) within the boundaries of the City of St. George; the vast majority of the resources are “buildings” associated with the Seal Island Historic District NHL; it is important to note that, although identified as such, many of the structures are not actually buildings (Tables 1 and 2).



Figure 5. Seal Islands Historic District NHL on Saint George Island (AHRs 2018).

Within the City of St. George, the NHL consists of a combination of Russian-period buildings and structures that were not destroyed by the ACC, as well as American structures, of which many replaced Russian buildings to allow for continued seal harvesting into the 20th century. Of the 68 identified sites on the AHRs, only four sites other than the NHL have had determinations of eligibility (DOE) conducted (Table 1). There are 65 contributing “buildings” within the NHL on the north shore of Saint George Island; however, they have not been adequately described or evaluated for their eligibility to the NRHP (Table 2).

Table 1: Sites that have DOE’s completed (AHRs 2018).

AHRs No.	Site Name	NRHP Status
XPI-002	Seal Islands Historic District	NHL
XPI-004	Great Martyr Orthodox Church	Listed
XPI-018	St. George Seal Skin Plant	Eligible
XPI-116	St. George School	Non-Contributing, Not Eligible

Table 2: Known cultural resources within the NHL which have been unevaluated.

AHRs No.	Site Type	NRHP Status
XPI-019	St. George Employee Cottage C	Contributing to NHL, no DOE
XPI-089	Company House	No DOE
XPI-090	Employee Cottage A	Contributing to NHL, no DOE
XPI-091	Employee Cottage D	Contributing to NHL, no DOE
XPI-092	Firehouse	Contributing to NHL, no DOE
XPI-093	Abandoned Pump House	Contributing to NHL, no DOE
XPI-094	Winch House	Contributing to NHL, no DOE
XPI-095	Machine Shop	Contributing to NHL, no DOE
XPI-096	Coal Shed	Contributing to NHL, no DOE
XPI-097	Aleutian Bunkhouse	Contributing to NHL, no DOE
XPI-098	Priest’s House	Contributing to NHL, no DOE
XPI-099	Aleut Labor Housing (ALH) 2	Contributing to NHL, no DOE
XPI-100	ALH 4	Contributing to NHL, no DOE
XPI-101	ALH 5	Contributing to NHL, no DOE
XPI-102	ALH 8	Contributing to NHL, no DOE
XPI-103	ALH 9	Contributing to NHL, no DOE
XPI-104	ALH 10	Contributing to NHL, no DOE
XPI-105	ALH 11	Contributing to NHL, no DOE
XPI-106	ALH 12	Contributing to NHL, no DOE
XPI-107	ALH 13	Contributing to NHL, no DOE
XPI-108	ALH 14	Contributing to NHL, no DOE
XPI-109	ALH 15	Contributing to NHL, no DOE
XPI-110	ALH 16	Contributing to NHL, no DOE
XPI-111	ALH 17	Contributing to NHL, no DOE
XPI-112	ALH (Unknown)	No DOE
XPI-113	ALH 19	Contributing to NHL, no DOE
XPI-114	ALH 20	Contributing to NHL, no DOE
XPI-115	ALH 21	Contributing to NHL, no DOE
XPI-117	ALH 23	Contributing to NHL, no DOE
XPI-118	ALH 24	Contributing to NHL, no DOE
XPI-119	ALH 6	Contributing to NHL, no DOE
XPI-120	ALH 22	Contributing to NHL, no DOE
XPI-121	ALH 31	Contributing to NHL, no DOE
XPI-122	ALH 32	Contributing to NHL, no DOE
XPI-123	ALH 34	Contributing to NHL, no DOE
XPI-124	ALH 35	Contributing to NHL, no DOE
XPI-125	ALH 36	Contributing to NHL, no DOE
XPI-126	Community Hall	Contributing to NHL, no DOE
XPI-127	Plumbing and Electrical Shop	Contributing to NHL, no DOE

XPI-128	Old Power Plant	Contributing to NHL, no DOE
XPI-129	Community Store	Contributing to NHL, no DOE
XPI-130	Hospital	Non-Contributing, no DOE
XPI-131	Carpenter Shop	Contributing to NHL, no DOE
XPI-132	ALH 37	Contributing to NHL, no DOE
XPI-133	ALH 38	Contributing to NHL, no DOE
XPI-134	ALH 39	Contributing to NHL, no DOE
XPI-135	ALH 43	Contributing to NHL, no DOE
XPI-136	ALH 42	Contributing to NHL, no DOE
XPI-144	ALH 40	Contributing to NHL, no DOE
XPI-145	ALH 41	Contributing to NHL, no DOE
XPI-146	City Office Building	Contributing to NHL, no DOE
XPI-147	Second Pump House	Contributing to NHL, no DOE
XPI-193	St. George Cemetery	Contributing to NHL, no DOE
XPI-194	St. George Outside Landing	Contributing to NHL, no DOE
XPI-195	St. George Inside Landing	Contributing to NHL, no DOE
XPI-196	Equipment Storage / Fish Plant	Non-Contributing, no DOE
XPI-197	New Power Plant	Non-Contributing, no DOE
XPI-198	ALH	Non-Contributing, no DOE
XPI-199	ALH	Non-Contributing, no DOE
XPI-200	ALH	Non-Contributing, no DOE
XPI-202	ALH	Non-Contributing, no DOE
XPI-203	ALH	Non-Contributing, no DOE
XPI-204	ALH	Non-Contributing, no DOE
XPI-205	ALH	Non-Contributing, no DOE
XPI-206	Employee Cottage E	Contributing to NHL, no DOE
XPI-207	Prib Kafe	Non-Contributing, no DOE

Prior to the development of the Zapadni Bay harbor on the southern shore in 1984 (Figure 5), St. George relied on their old docks (XPI-194, XPI-195) located on the northwestern shore of the bight which the town overlooks. The Inside Landing was constructed first, however the original date is unknown; however it was refurbished in 1822, while the Outside landing had been finished and was useable in 1957 (NOAA 2010a). Historically, all commercial activities, subsistence activities, and transportation, including the transferring seal and fox pelts, were conducted off of these docks (Isto 2012). While still in use until the Zapadni Bay harbor’s construction, the old docks (XPI-195) remained dangerous due to environmental conditions (Figures 6 and 7). Elliot’s (1881) description of the harbor at St. George paint a bleak and dangerous picture of the area:

“Lack of Harbors: Anchorages. – The total absence of a harbor at the Pribylov islands is much to be regretted... At St. George matters are still worse, for the prevailing northerly, westerly, and easterly winds drive the boats away from the village roadstead, and weeks often pass at either island, but more frequently at the latter, ere a cargo is landed at its destination. Under the very best of circumstances, it is both hazardous and trying to load and unload ship at any of these places... At St. George, however, the bold, abrupt, bluffly coast everywhere all around, with its circling girdle of flying water-birds far out to

sea, looms up quite prominently, even in the fog; or, in other words, the navigator can notice it before he is hard aground or struggling to haul to windward from the breakers under his lee. There are no reefs making out from St. George worthy of notice... At St. George the steamer comes, wind permitting, directly to the village on the north shore, close in, and finds her anchorage in ten fathoms of water, in poor holding-ground; but it is only when three or four days have passed free from northerly, westerly, or easterly winds, that she can make the first attempt to safely unload. The landing here is a very bad one, surf breaking most violently upon the rocks from one end of the year to the other (Elliot 1881:16).”



Figure 6. View of the outside landing (XPI-194) at St. George from the bluffs to the southwest (Sparaga 2018).



Figure 7. View of the outside landing (XPI-194) at St. George, looking northwest (Sparaga 2018).

There are a number of shipwrecks in the vicinity of Saint George Island that corroborate Elliot's description of the navigation dangers. While the National Oceanic and Atmospheric Agency's (NOAA) shipwreck map is absent of nearby wrecks, the Bureau of Ocean Energy Management (BOEM) lists a number of shipwrecks associated with Saint George Island (BOEM 2011; NOAA 2018). These include the Russian ship the *Sv. Ioann Pretecha*, which is noted to have shipwrecked in 1792 "on the island." In 1915, the *Maweema* sunk 5 miles from the St. George village. The *Amatuli* sunk 45 miles off Saint George Island in 1987, and the *Belair* sunk on the south side of the island in 1994. The steamer *Laurada* is noted as having been wrecked off "Zapadni Point" of Saint George in 1899; however, there is no Zapadni Point on St. George. It is likely that the *Laurada* sunk off of Zapadni Point on Saint Paul Island (BOEM 2011).

The original dock for the community of St. George, the St. George Inside Landing (XPI-195), is directly south of the St. George Outside Landing (XPI-194). XPI-195 does not extend out into the bight, but instead was constructed along the shoreline. This dock was used primarily for offloading the seal carcasses from hunting around the rookeries and community goods, and for loading barrels of processed seal skins onto boats with shallow drafts (Figures 8 and 9). The original construction of this dock is unknown; historic documents note that it was damaged from weathering and from a fire, and then repaired (NOAA 2010a:16). Historic photographs also show rigging for lever booms to assist in moving goods from dock to boat and back (Figure 10).



Figure 8. View of St. George Village from XPI-194. The inside landing (XPI-195) is on the right in the orange outline. The Seal Skin Plant (XPI-018) is the large white building on the left, while the Great Martyr Orthodox Church (XPI-004) is uphill near the center (Sparaga 2018).



Figure 9. A closer view of XPI-195. The base of a small crane is on the right side. The old Community Store of the Swalling Construction Company (XPI-129) is in the top left, while the Second Pump House (XPI-147) is visible behind and upland of the two sites (Sparaga 2018).



Figure 10. Historic photo of the St. George Inside Landing (XPI-195), date unknown, catalog number RG22-95-ADMC-2863 (NARA 2018).

4.0 Archaeological Field Survey

On 27 August 2018, USACE Archaeologist Joseph Sparaga visited St. George with several USACE personnel for a public meeting to discuss options with the community for a prospective harbor. While a number of construction alternatives had been identified, preliminary studies recognized that the northern shore of the island has significant advantages as a location for a harbor; the island itself acts as a buffer from extreme weather conditions from the southern Bering Sea. The community agreed that the north harbor proposal was in their best interest, acknowledging a number of advantages the community would have with the docks being constructed on the same side of the island as the city. While on the island, Sparaga surveyed the two historic docks in the bight in front of the St. George community in order to identify current conditions and their association with the fur seal industry on the island.

4.1 St. George Inside Landing (XPI-195)

The St. George Inside Landing (XPI-195) is the older dock, which was built prior to 1922 (NOAA 2010a). There is no specific date known for the original installation of the dock. It was heavily refurbished in 1922 after a storm destroyed most of the dock. During this reconstruction, the bight was blasted with dynamite and dredged to remove 18 inches of rock from the sea floor, from the shoreline to 30 feet out from shore (NOAA 2010a). The St. George Inside Landing was also damaged during a fire in 1950; it was likely repaired afterward. Over the last 70 years, the inner dock has been worn away and damaged; today the exposed rebar from its reinforced

concrete is exposed (Figures 11 and 12). The identifiable concrete dimensions of the St. George Inside Landing is approximately 30 feet (ft) by 50 ft. Historic photographs indicate that the dock may have originally been slightly wider; however the dock to the non-concrete sections of the dock are no longer present. Historic photographs show that there wooden boards covered the floor of the structure, and met up with wooden walkways heading into town (Figure 13 and 14). The 2018 survey found that both the Inside and Outside landings were made with a combination of local stone and concrete, in addition to reinforced concrete. The local cobble and concrete mixture appears to provide the base structure of the Outside Landings walkway and the fill for the Inside Landing, while the reinforced concrete consists of the walls and horizontal sections of the Landings. Reinforcing concrete with rebar was a common building method by the 20th century (Moussard et al. 2017).



Figure 11. The weathered reinforced concrete on the St. George Inside Landing (XPI-195). Interior sections of the dock are exposed and show substantial concrete degradation and loss of fill.



Figure 12. A 1948 photograph of the St. George Inside Landing (XPI-195) with a row boat lightering supplies to the dock (Alaska Digital Archives UAF-1970-11-96).



Figure 13. Community members docking a baidar at the St. George Inside Landing (XPI-195) in 1954 (Swalley 2018).

4.2 St. George Outside Landing (XPI-194)

The St. George Outside Landing (XPI-194) was constructed in 1957 to improve access to the community by increasing usable docking days. In 2018, the dock was approximately 260 ft by 20 ft for the length of the entire dock and the width of the ramp, with an octagonal dock at the end which was 30 ft across (Figure 16). This dock was constructed with a reinforced concrete surface and heavy concrete retaining walls, overlaid on a natural outcrop and local scoria fill. Metal structures indicate that this dock, similar to the St. George Inside Landing, had a wooden crane at the end to move cargo between the docks and the boats (Figures 17 and 18). The outer dock had two benefits over the first dock: it was usable at low tide, and it created a wave barrier for the inner harbor during rough weather. Presently, the St. George Outside Landing has suffered from considerable weathering; the concrete slabs which lined the walkway have been moved from their original location, with portions of the concrete walkway strewn across the beach, and the reinforced concrete has weathered to expose rebar and other set metal parts.



Figure 14. The St. George Outside Landing (XPI-194); view from the base of the dock on the shore (Sparaga 2018). The orange arrows are where Figure 10 (left) and Figure 11 (right) are located.



Figure 15. Concrete and metal object at the end of the St. George Outside Landing (XPI-194); this would likely have supported a boom lever attached to unload supplies from boats (Sparaga 2018).



Figure 16. An exposed metal base for a wooden lever joist is located just off the St. George Outside Landing (XPI-194) near where the dock connects to the shoreline (Sparaga 2018).

In 2018, there were remnants of large metal winch debris at the base of the St. George Outside Landing. These may have been part of a machine system used to assist the movement of goods between the shore and the end of the dock; however, there are no photos of the Outside Landing that show any use of this equipment. The shoreline between both docks contains intermittent rusted metal debris likely associated with the use of the docks and earlier sealing industry. Fragments of the reinforced concrete slabs that originally covered the outer dock can be identified along the beach as well. At this time, neither docks are usable. Additionally, they present a hazard for human and animal well-being due to exposed sharp metal debris such as weathered rebar. During the 2018 pedestrian survey, a resident was seen collecting sea urchins and other tidewater subsistence foods that are growing between the rocks in the area.

5.0 Determinations of Eligibility for the National Register of Historic Places

Cultural properties (districts, sites, buildings, structures, or objects) may be eligible for the National Register of Historic Places (NRHP) if they meet one or more of the National Register Criteria for Evaluation. The criteria listed in 36 CFR § 60.4 are:

- A. *Events*. Association with events that have made a significant contribution to the broad patterns of history.
- B. *Persons*. Association with the lives of persons significant in the past.
- C. *Design or Construction*. Embodies the distinctive characteristic of a type, period, or method of construction, representing the work of a master, possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. *Information potential*. Yielded or is likely to yield information important in prehistory or history.

If a property is significant under Criterion A, it should retain the essential physical features “that made up its character or appearance during the period of its association with the important event” (NPS 1997:46). And while design and workmanship may not be as vital, the integrity of location, setting, materials, feeling, and association should ideally be retained (NPS 1997:48).

If a property is significant under Criterion B, the property should retain features “that made up its character or appearance during the period of its association with the important person(s)” (NPS 1997:46). Eligible sites under Criteria B must be in overall good condition with excellent preservation of features, artifact, and spatial relationships that the extent that these remain are able to convey important associations with persons (NPS 1997:46).

If a property is significant under Criterion C, the structure “must retain most of the physical features that constitute that style or technique” (NPS 1997:46). If it has lost the majority of the features that characterized its style, then the property is not eligible. Under Criterion C, the integrity of design, workmanship, and materials are usually more important than location, setting, feeling, and association (NPS 1997:48).

If a property is significant under Criterion D, the integrity of the structure “is based upon the property’s potential to yield specific data that addresses important research questions” (NPS 1997:46). For “properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than if they were being considered under Criteria A, B, or C” (NPS 1997:46). NPS (1997:46) recommends that the evaluation of integrity under Criterion D focus “primarily on the location, design, materials, and perhaps workmanship” of the site.

5.1 XPI-194 St. George Outside Landing.

Criterion A: Associated with Significant Events.

To be considered for listing under Criterion A, a property “must be associated with one or more events important in the defined historical contact” (NPS 1997:12). And while design and workmanship may not be as vital, the integrity of location, setting, materials, feeling, and association should ideally be retained (NPS 1997:48). The St. George Outside Landing is associated with the fur sealing industry for which the community of St. George was established until the commercial sealing ended in 1973. While it is not the first dock for the industry, between 1957 and 1984 it served the dual purpose of supplying the community with offloaded resources as well as loading the barreled seal skins when boats could not make it to the inner dock. The St. George Outside Landing also served as a wave break for the inner dock during rough seas. The St. George Outside Landing (XPI-194) **is eligible for listing on the NRHP under Criterion A.**

Criterion B: Association with Significant Persons.

Properties eligible for the NRHP under Criterion B are usually associated with a person’s productive life, reflecting the time period when he or she achieved significance. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group at that location (NPS 1997:15). There are no persons of known significance related to the St. George Outside Landing. The St. George Outside Landing (XPI-194), **is not eligible for listing on the NRHP under Criterion B.**

Criterion C: Association with Significant Design/Construction.

If a property is eligible for the NRHP under Criterion C, the structure “must retain most of the physical features that constitute that style or technique” (NPS 1997:46). If it has lost the majority of the features that characterize its style, then the property is not eligible. Under Criterion C, the integrity of design, workmanship, and materials are usually more important than the location, setting, feeling, and association (NPS 1997:48). The St. George Outside Landing was constructed with reinforced concrete and some use of the local rock supply. The dock supported a number of built-in cranes which have been removed or lost to large storm events. There is no discernable significance in the St. George Outside Landings’ construction, and the literature does not note any exceptional design modifications for the dock. The St. George Outside Landings (XPI-194) **is not eligible for listing on the NRHP under Criterion C.**

Criterion D: Association of Information Potential.

If a property is eligible for the NRHP under Criterion D, the significance of the structure “is based upon the property’s potential to yield specific data that addresses important research questions” (NPS 1997:46). For “properties eligible under Criterion D, including archaeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than if they were being considered under Criterion A, B, or C” (NPS 1997:46). The NPS (1997:49) recommends that evaluation of integrity under Criterion D focus “primarily on the location, design, materials, and perhaps workmanship” of the site. The St. George Outside Landing has sustained substantial weathering, however the structure is still located within its original location. The structure has been photographed, GPS-marked at all corners, and the outline of the structure has been tracked. The collection of this data concludes that XPI-194 no longer has potential to yield specific data other than what is already known. As such, the St. George Outside Landing (XPI-194) is **not eligible for the NRHP under Criterion D**.

5.2 St. George Inside Landing (XPI-195).

Criterion A: Association with Significant Events.

To be considered for listing under Criterion A, a property “must be associated with one or more events important in the defined historic context” (NPS 1997:12). And while design and workmanship may not be as vital, the integrity of location, setting, materials, feeling, and association should ideally be retained (NPS 1997:48). The St. George Inside Landing was the first dock known to be constructed for the community of St. George; it was used for offloading supplies to the community as well as loading on barrels of seal skins for shipment back to the continental U.S. until the commercial sealing ended in 1973. It was of primary importance to the economy of St. George, and integral to the processing and movement of seal products within the industry. Due to this, the St. George Inside Landing (XPI-195) structure is **eligible for listing on the NRHP under Criterion A**.

Criterion B: Association with significant persons.

Properties eligible for the NRHP under Criterion B are usually associated with a person’s productive life, reflecting the time period when he or she achieved significance. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group at that location (NPS 1997:15). There are no persons of known historical significance related to the St. George Inside Landing; as such, the St. George Inside Landing (XPI-195), is **not eligible for listing on the NRHP under Criterion B**.

Criterion C: Association with Significant Design/Construction.

If a property is eligible for the NRHP under Criterion C, the structure “must retain most of the physical features that constitute that style or technique” (NPS 1997:46). If it has lost the

majority of the features that characterize its style, then the property is not significant. Under Criterion C, the integrity of design, workmanship, and materials are usually more important than the location, setting, feeling, and association (NPS 1997:48). The St. George Inside Landing was not designed or constructed with any specialized or unique plan, but with a combination of reinforced concrete and concrete slabs which were placed over exposed local rock. There were no original blueprints or documents found to determine if the purpose of the dock was constructed for the community and used by the fur seal industry, or if the dock was built specifically for the fur seal industry. After reviewing historic photos and a field survey, it is apparent that the St. George Inside Landing was not constructed in any manner unique to the fur seal industry. While heavily weathered, the dock appears to be built using a portion of local resources with cement, as well as the reinforced concrete common with construction around the same period. As such, the St. George Inside Landing (XPI-195) is **not eligible for listing on the NRHP under Criterion C.**

Criterion D: Association of Information Potential.

If a property is eligible for the NRHP under Criterion D, the significance of the structure “is based upon the property’s potential to yield specific data that addresses important research questions” (NPS 1997:46). For “properties eligible under Criterion D, including archaeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than if they were being considered under Criterion A, B, or C” (NPS 1997:46). The NPS (1997:49) recommends that evaluation of integrity under Criterion D focus “primarily on the location, design, materials, and perhaps workmanship” of the site. While the St. George Inside Landing has sustained substantial storm damage, the majority of the structure is still located within its original location and setting. The structure has been photographed, GPS-marked at all corners, and GPS-tracked along its outer edges, as no original blueprints or plans could be identified. With the collection of this data, there is no longer a potential to yield additional specific information. As such, the St. George Inside Landing (XPI-195) is **not eligible for listing on the NRHP under Criterion D.**

6.0 Consideration of Integrity

In order to be considered eligible for the NRHP, a property must retain sufficient integrity to convey its significance in American history, architecture, archaeology, engineering, or culture (NPS 1997:44). There are seven aspects of integrity – location, design, setting, materials, workmanship, feeling, and association. The property must also convey its historic identity through retention of essential physical features (Table 3 and 4). Essential physical features enable the property to convey its historic identity; the features represent *why* and *when* a property was significant.

Table 3: Integrity criteria of the Outside Landing (XPI-194).

Criterion	Essential Physical Feature	Vital Aspects of Integrity
A	Must retain: Evidence of Seal Industry	Location, Setting, Association

Table 4: Integrity criteria of the Inside Landing (XPI-195).

Criterion	Essential Physical Feature	Vital Aspects of Integrity
A	Must retain: Evidence of Seal Industry	Location, Setting, Association

6.1 St. George Outside Landing (XPI-194)

To retain integrity of *location*, a property must be located where it was originally constructed or where the historic event occurred (NPS 1997:44). The St. George Outside Landing is a large stone and reinforced concrete structure that extends out from the shoreline into the ocean. While the large and powerful storms of the Bering Sea have damaged and removed portions of the site, the primary structure of the dock is still in its original place. Any machinery that assisted with the use of the dock has been either removed or has been destroyed by the weathering. As the primary physical features of the St. George Outside Landing, including the concrete foundations of the dock, are still present, the feature **retains integrity of location**.

To retain integrity of *design*, a property must have its original “form, plan, space, structure, and style” (NPS 1997:44). The St. George Outside Landing was built to facilitate better access between transport ships and St. George. It extends out to a slightly deeper water where larger boats can tie up, approximately 260 ft away from the shoreline; while the outside landing extended farther out from shore, the gain in draft depth was still limited and was a benefit during lower tides. The St. George Outside Landing had the additional benefit of creating a small breakwater for the St. George Inside Landing. The integrated hoist posts that were still present were designed to load and unload baidars and other cargo boats to transport between St. George and anchored vessels offshore. There is still a concrete outline of the structure, much of the non-concrete sections of the dock, including the beachfront facilities are now missing. There have been no plans or photographs of how the structure originally looked or what materials were in the final design, making the integrity of its original structure difficult to ascertain. As such, the St. George Outside Landing **retains integrity of design**.

To retain integrity of *setting*, the character of the physical environment and the surroundings “in which the property played its historic role” must be maintained (NPS 1997:45). The St. George Outside Landing was essential for supplying the community of St. George with goods from ships, as well as sending out fur seal products for transport. The dock was an important conduit between the St. George Seal Skin Plant and ship transportation, and also as a breakwater for the St. George Inside Landing. The Seal Skin Plant, and many of the fur seal industry buildings in St. George constructed by the ACC, are either still standing or have been renovated; as such, these structures that were historically associated with the dock are still present. Because of this, the St. George Outside Landing **retains integrity of setting**.

To retain integrity of *materials*, a property “must retain the key exterior materials dating from the period of its historic significance” (NPS 1997:45). The St. George Outside Landing was constructed out of a number of different materials. These include local scoria rock, cement, and - reinforced concrete. There are also a number of partial machinery components that likely were part of a system to help load and offload boats. The lack of historic photos of the outside landing make it difficult to determine all of the materials that were used for its construction; however

photos of the inside landing have indicated that wooden planks were used to cover the dock, and the Outside Landing also had wooden and metal cranes that was used to move cargo to and from boats. The original locations of these cranes are still identifiable, as their bases were embedded into the concrete. The St. George Outside Landing has lost much of its original materials outside of its base structure, and so it **does not retain integrity of materials**.

To retain integrity of *workmanship*, a property “has the evidence of artisans’ labor and skill in constructing or altering a building, structure, object or site” (NPS 1997:45). The St. George Outside Landing was constructed with a combination of concrete, reinforced concrete, and local cobbles; while no historical photos of the completed dock showed how it originally looked, it is likely to be similar to the hardwood top and railings from the photos of the other landing. Currently, the weathering and lack of use of resulted in damaging the overall structure and hiding any workmanship that may have made the docks unique. As such, the St. George Outside Landing **does not retain integrity of workmanship**.

To retain integrity of *feeling*, a property “must express an aesthetic or historic sense of a particular period of time” (NPS 1997:45). The St. George Outside Landing is associated with the fur seal harvesting industry at St. George, and the role it filled as a lifeline between the island community and ships bringing and taking cargo. The Outside Landing is next to both the Inside Landing and the Seal Skin Plant, where the final stages of fur processing took place. Portions of the structure have been lost, as well as the associated ramps and stairs to the landing from weathering. As the Outside Landing has not been the primary moorage since 1984, much of the features that support a feeling of a dock, or its use historically, are no longer present. The condition of the dock has not affected the historic sense of the feature, and as such the St. George Outside Landing **does not retain integrity of feeling**.

To retain integrity of *association*, a property must have a “direct link between an important historic event or person and a historic property” (NPS 1997:45). The St. George Outside Landing was an integral part of the community of St. George’s supply and distribution link off-island. It provided better access to shore during low tides, served as a breakwater, and was an addition to the total infrastructure for the sealing industry on St. George, especially with such limited natural resources for construction. The St. George Outside Landing is still situated in relation to many of the original seal industry buildings; there has been no relocation of any of these structures. As such, the St. George Outside Landing **retains integrity of association**.

Table 5: The St. George Outside Landing’s retention of integrity.

Fur Sealing Character	Location	Design	Setting	Materials	Workmanship	Feeling	Association
Yes	Yes	Yes	Yes	No	No	No	Yes

The St. George Outside Landing (XPI-194) is **eligible for listing on the NRHP under Evaluation Criterion A**. The St. George Outside Landing was constructed in 1957 in order to facilitate use by deeper draft vessels. It served a dual purpose as both a dock and a protective breakwater for the Inside Landing. Similar to the Inside Landing, the Outside Landing has suffered considerable degradation of its physical features. However, it is still physically in its

original location and maintains its association with the fur sealing industry. It retains sufficient aspects of integrity (location, setting, association) to be considered eligible for the NRHP.

6.2 St. George Inside Landing (XPI-195)

To retain integrity of *location*, a property must be located where it was originally constructed or where the historic event occurred (NPS 1997:44). The St. George Inside Landing is within the bight alongside the community of St. George, where it was originally constructed. Although heavily weathered, it has not been demolished or removed. The remains of the dock, which consist of more than half of the original structure, are still standing. As such, the St. George Inside Landing (XPI-195) **retains integrity of location**.

To retain integrity of *design*, a property must have its original “form, plan, space, structure, and style” (NPS 1997:44). The St. George Inside Landing has lost much of its original design, and historic photos show that the dock was originally connected to the shoreline facilities via a wooden boardwalk. These photographs also show some dock features, such as the small cargo cranes and levers, are no longer present. Historic documents indicate that the dock was heavily impacted by a fire in 1950; some design modifications likely occurred in order to repair the dock. As such, the St. George Inside Landing (XPI-195) **does not retain integrity of design**.

To retain integrity of *setting*, the character of the physical environment and the surroundings “in which the property played its historic role” must be maintained (NPS 1997:45). The St. George Inside Landing was constructed within a natural bight along the northern shoreline of Saint George, next to the community of St. George. It is unknown when the original dock was constructed; however, historic documents suggest that it was built soon after the community was settled. The 2018 survey showed that while the primary material was reinforced concrete, local rock material, including scoria, was mixed in with cement to form the base structure. The physical location of the site has remained the same. During the 1950 repairs, the bight was dynamited in order to increase the basin depth by approximately 18 inches; however, this only had a limited visible impact on the overall environment. The St. George Inside Landing (XPI-195) **retains integrity of setting**.

To retain integrity of *materials*, a property “must retain the key exterior materials dating from the period of its historic significance” (NPS 1997:45). The St. George Inside Landing was constructed of reinforced concrete slabs and walls. Much of this concrete has degraded; rebar is now exposed. It appears that the interior of the dock may have been a combination of local scoria and other rock material intermixed with cement, but much of it has eroded away. Any wooden construction on the dock is no longer present, and exposed metal is rusted and degraded. The levers used to move goods between the dock and boats are also missing; only their metal bases located within the concrete remain. Compared with historical photographs, the dock itself has lost much of its associated materials. As such, the St. George Inside Landing (XPI-195) **does not retain integrity of materials**.

To retain integrity of *workmanships*, a property “has the evidence of artisans’ labor and skill in constructing or altering a building, structure, object or site” (NPS 1997:45). The St. George Inside Landing was constructed with reinforced concrete and filled with a combination

of local boulders and concrete; historical photos show some form of hardwood top with railings and a lever boom. The weathering and lack of use of resulted in damaging the overall structure and hiding any workmanship that may have made the docks unique. As such, the St. George Inside Landing **does not retain integrity of workmanship.**

To retain integrity of *feeling*, a property “must express an aesthetic or historic sense of a particular period of time (NPS 1997:45). The St. George Inside Landing is still located within the area of its original use, near the Seal Processing Plant, the St. George Outside Landing, and many of the other associated fur seal industry structures. The environment that existed at the time of the fur seal industry has changed only slightly. However, the industry that operated from the harbor at Saint George no longer operates, and the landings are no longer used for their purpose for mooring boats. Fishing and birding boats do not moor here, unless storms have forced them to the side of the island to wait it out. As such, the St. George Inside Landing (XPI-195) **does not retain integrity of feeling.**

To retain integrity of *association*, a property must have a “direct link between an important historic event or person and a historic property” (NPS 1997:45). The St. George Inside Landing still retains its physical link and association with structures and buildings that were constructed specifically for the fur seal industry. As such, the St. George Inside Landing (XPI-195) **retains integrity of association.**

Table 6: The St. George Inside Landing’s retention of integrity.

Fur Sealing Character	Location	Design	Setting	Materials	Workmanship	Feeling	Association
Yes	Yes	No	Yes	No	No	No	Yes

The St. George Inside Landing (XPI-195) is **eligible for listing on the NRHP under Evaluation Criterion A.** The dock was pivotal for the survival of the early community of St. George, as well as part of the key infrastructure for the seal harvesting industry. While the structure has been heavily weathered and is no longer used in any capacity, the dock still exists within its original context of the fur seal industry on Saint George Island and retains sufficient aspects of integrity (location, setting, feeling, association) to be considered eligible for the NRHP.

7.0 Conclusion

This report describes the results of an archaeological survey of the APE associated with proposed navigation improvements at St. George on Saint George Island. The survey was conducted in August 2018 by a USACE Alaska District archaeologist who meets the Secretary of the Interior's Professional Qualification Standards. The USACE has evaluated the eligibility of two historic structures for listing on the NRHP. Both structures are identified as contributing properties to the Seal Islands Historic District NHL. The USACE has found that both the St. George Outside Landing (XPI-194) and the St. George Inside Landing (XPI-194) are eligible for the NRHP. Both structures meet National Register Criterion for Evaluation A, and retain the essential physical characteristics and sufficient integrity for listing. The USACE **requests concurrence** from the SHPO that the St. George Outside Landing (XPI-194) and the St. George Inside Landing (XPI-195) are eligible for listing on the NRHP.

8.0 References Cited

- Alaska Digital Archives
2018. Search for St. George, electronic document.
<<https://vilda.alaska.edu/digital/search/searchterm/St.%20George>>, accessed on 30 January, 2019.
- Alaska Heritage Resources Survey (AHRs)
2018. Alaska State Office of History and Archaeology (OHA) database.
- Black, Lydia
2004. *Russians in Alaska: 1732-1867*. University of Alaska Press, Fairbanks.
- Bureau of Ocean Energy Management (BOEM)
2011. Shipwrecks of Alaska's Coast. Electronic Document,
https://www.boem.gov/uploadedFiles/BOEM/About_BOEM/BOEM_Regions/Alaska_Region/Ships/2011_Shipwreck.pdf, accessed on June 19, 2018.
- Commission on Wartime Relocation and Internment of Civilians (Commission)
1983. Personal Justice Denied. Part II: The Aleuts. Electronic document,
<https://www.archives.gov/research/japanese-americans/justice-denied>, accessed March 01, 2018.
- Eldridge, Kelly A.
2016. An Analysis of Archaeofauna Recovered from a Russian Period Camp on St. Paul Island, Pribilof Islands, Alaska. *Arctic Anthropology* Vol. 53(2):33-51.
- Elliot, Henry Wood
1881. *The Seal-Islands of Alaska*. Government Printing Office, Washington D.C.
- Etnier, Michael
2004. 2004. Evaluation of Staraya Artil Paleontological and Archaeological Resources: Progress Report and Recommendations for Further Study. St. George Traditional Council.
- Faulkner, Sandra McDermott
1986. *National Register of Historic Places Inventory – Nomination Form: The Seal Islands (Fur Seal Rookeries NHL)*. National Park Service, Alaska Region.
- Faulkner, Sandra McDermott, William S. Hanable, and Robert L. S. Spude.
1987. *Russia America Theme: National Historic Landmarks*. U.S. Department of the Interior. Anchorage: National Park Service, Alaska Region.
- Jochelson, Waldemar
2003 [1931]. *History, Ethnology and Anthropology of the Aleut*. University of Utah Press, Salt Lake City.
- Jones, Dorothy Knee
1980. *A Century of Servitude: Pribilof Aleuts Under U.S. Rule*. University Press of America, Inc., Washington D.C.
- Moussard, Michel, Patricia Garibaldi, and Manfred Curbach
2017. The Invention of Reinforced Concrete (1848-1906). In *High Tech Concrete: Where Technology and Engineering Meet*, edited by Hordijk D., and Luković M. p.p. 2785-2794. Springer, Cham.

National Archives and Records Administration (NARA)

2018. No. 345 St. George Dock, ARC Identifier 1656105. *Photographs of Social and Economic Life, Environmental Conditions and Cleanup Operations on the Pribilof Islands, Alaska*. Electronic file, <https://aad.archives.gov/aad/record-detail.jsp?dt=2312&mtch=582&tf=I&q=St.+George&bc=&rpp=10&pg=1&rid=1596&rlst=1055,1248,1249,1251,1259,1261,1518,1592,1595,1596>, Accessed 6/20/2018.

National Oceanic and Atmospheric Administration (NOAA)

2018. Wrecks and Obstructions Database. Electronic Document, <https://nauticalcharts.noaa.gov/data/wrecks-and-obstructions.html>, accessed 6/19/2018.

2010a. *The Pribilof Islands, Alaska, Historic American Buildings Survey (HABS) Historical Report*. Office of Response and Restoration, Seattle.

2010b. Community Profiles for North Pacific Fisheries – Alaska: Saint George. Electronic document, https://www.afsc.noaa.gov/REFM/Socioeconomics/Projects/communityprofiles/St_George_Profile_2000_2010.pdf, Accessed 10 December 2018.

Osgood, Wilfred Hudson, Edward Alexander Preble, George Howard Parker, and Rose Mortimer Ellzey MacDonald

1915. *The Fur Seals and Other Life of the Pribilof Islands, Alaska, in 1914*. Government Printing Office, Washington D.C.

Swalley Construction Company Collection

2018. Baidar Docked at St. George Village, St. George Island Circa 1954. Electronic document, < ftp://ftp.library.noaa.gov/noaa_documents.lib/NOS/ORR/TM_NOS_ORR/TM_NOS-ORR_17/HTML/Pribilof_html/Images/Gallery/Gallery_Swalley_Construction_Co_1954/10.html>, accessed 27 December 2018.

Torrey, Barbara Boyle

1980. *Slaves of the Harvest*. Tanadgusix Corporation, Anchorage.

Veniaminov, I.

1984 [1840]. *Notes on the Islands of the Unalaska District*. Translated by L. Black and R. H. Geoghegan, edited by R.A. Pierce. Limestone Press, Kingston.

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May 2, 2019

File No.: 3130-1R COE-E / 2018-0831

Joseph E. Sparaga
U.S. Army Corps of Engineers
Alaska District CEPOA-PM-C-ER
P.O. Box 6898
JBER, AK 99506-0898

Subject: St. George Harbor Project

Dear Mr. Sparaga:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence (dated March 25, 2019) concerning the subject project on April 4, 2019. Our office has reviewed the undertaking pursuant Section 106 of the National Historic Preservation Act and offer the following comments for your consideration.

It is our office's understanding that the St. George Outside Landing (XPI-00194) and the St. George Inside Landing (XPI-00195) were not inventoried as cultural resources until 2007 and neither structure had been evaluated for their potential to contribute to the Seal Islands Historic District (Fur Seal Rookeries) National Historic Landmark (NHL) (XPI-00002). Our office recommends revising your documentation to reflect the contributing features for the district as found in the AHRS or providing our office with source information to update the AHRS.

After review of the provided documentation, our office concurs that the St. George Outside Landing (XPI-00194) and the St. George Inside Landing (XPI-00195) contribute to the Seal Islands Historic District. As such, we concur that a finding of adverse effect is appropriate for the proposed undertaking.

We look forward to continuing consultation to develop a Memorandum of Agreement for the proposed project. Additionally, we recommend USACE considers potential indirect and cumulative effects the project may have on the NHL as your agency refines the area of potential effects based on the more developed project footprint provided with your documentation.

Thank you for the opportunity to review and comment. Please contact Sarah Meitl at 269-8720 or sarah.meitl@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Judith E. Bittner".

Judith E. Bittner
Deputy State Historic Preservation Officer

JEB:sjm