

SOW - Level III Cultural Resources Survey for Deadwood SD, FEMA DR-4476-SD

I have recently spoken (independently) to both Kevin Kuchenbecker (Historic Preservation Officer, City of Deadwood) and Jenna Carlson Dietmeier (SHPO Review Archaeologist) about the above referenced (& proposed project). We discussed archaeological sensitivity of the series of damaged sites and also candidly addressed the fact that FEMA Public Assistance has not yet approved a scope-of-work for either “return to pre-disaster” damages or related hazard mitigation (Section 406) projects. However, both individuals referred to above agreed that in order to speed the overall review process that having a qualified archaeologist and architectural historian complete a **Level III Cultural Resources Survey** would be an appropriate start, while fully realizing that the project sites are located within a National Historic Landmark and within the boundary of a very large multi-component archaeological site. All parties also realize that the project location is within areas sensitive to Native American Tribes.

My suggestion (and again, approved by SHPO and the City Historic Preservation Officer) is as follows:

- The Applicant (City) hires a qualified cultural resources consultant (an archaeologist and architectural historian) to perform a standard Level III Cultural Resources Survey (<https://www.nrc.gov/docs/ML1417/ML14171A688.pdf>). I recommend that both the archaeologist and architectural historian call me to discuss the work to be performed before preparing a bid to the City and also before actually going into the field. I am especially interested in having the architectural historian examine potentially significant historic above-ground elements (wood/stone walls) along Whitewood Creek; and also perhaps other sites related to mining, historic dumps, etc.
- The in-field component of the combined archaeological/architectural survey should be preceded by a thorough examination of a variety of background historical documentation (maps, previous surveys, etc.) pertinent to the damaged locations. Reference should also be made to the ARMs Data Base, the National Historic Landmark reports (see attached), and Deadwood’s “Comprehensive Master Plan” & Historic Preservation Commission standardized Design Guidelines for the Downtown Commercial District.
- Examination is to occur within and immediately surrounding each of the damaged site locations depicted on the map provided by the City Engineer. I strongly encourage the cultural resource consultants meet the City Engineers and Kevin Kuchenbecker in the field to go over specifics of the damaged sites.
- Both the architectural historian and archaeologist is to discuss proposed hazard mitigation work with the City Engineer and City Historic Preservation Office in an effort to highlight any potential (adverse) visual effects of the proposed work.
- As the cultural resources survey work is on a fast track, I ask for weekly progress reports (phone calls or emails) from the consultants to me.

- There is no need for the cultural resource consultants to contact any Tribes with ancestral interest in the project area – I will handle this aspect of consultation. I will also separately contact the Deadwood Trust for Historic Preservation.
- The Applicant is to send me a draft copy of the Level III report to review – I will then send it to SHPO and to the National Park Service for their input.

I want to again emphasize that at this time the SOW for the repairs is not approved by FEMA, and there is no hazard mitigation proposal prepared. All project site descriptions (damaged sites) are referenced in engineering documents provided by the City and at this time only reflect standard repairs to restore back to pre-disaster design, function and capacity within the existing footprint. The intent of the Level III Cultural Resources Survey is to document known historic properties based on the ARMS Data Base, the National Historic Landmark reports, other forms of background research, and in-field survey. Impacts that may result from proposed hazard mitigation will be analyzed only after FEMA approves a mitigation strategy. Depending on the results of the Level III survey and particulars of any proposed FEMA Section 406 Mitigation, there could be additional cultural resources fieldwork (both archaeo and architectural) required to determine adverse effects, and subsequent consultations with City, SHPO, NPS, and Tribes.

Charlie Bello

07/25/2022