

## **Appendix I:**

Draft EA Comment Response



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Sitka SPB Draft EA Comments

Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
1	3/16/2021	Email	Rebecca Paulson	Individual	Cultural		
A						there should be archaeological monitoring, for the parts that involve digging - it looks like most of this will be blasting or fill, so the part where monitoring is needed won't be a lot, this has things from WWII but also there is the possibility of Tlingit material, as Japonski and nearby islands were heavily utilized by Tlingit people up until around 1905 and going back thousands of years.	CBS has committed to have archaeological monitoring during ground disturbance.
B						thoroughly document the concrete bunker. I guess there is another still in existence, but it is on private property, that I believe is for sale, so it is not at all safe from being demolished itself.	CBS will consult with appropriate consulting parties to address the adverse effect on the post from the project. Consultations will address the need for and the appropriate mitigation.
C						NPS has design guidelines for the NHL, I think this would not be hard to do, to make any structures compatible with the historic structures of the Landmark, in their roofline, massing etc.	CBS will consult with appropriate consulting parties to address the adverse effect on the post from the project. Consultations will address the need for and the appropriate mitigation.
D						Finally, because this will have an adverse impact, and destroy a structure that is eligible for listing on the National Register, is some ideas for mitigation - ...as a 501(c)3 the Sitka Maritime Heritage Society would be an appropriate place for mitigation, whether that's to - help preserve the boatshop structure and get it open to the public, or interpretation of the WWII period.	CBS will consult with appropriate consulting parties to address the adverse effect on the post from the project. Consultations will address the need for and the appropriate mitigation.
2	3/4/2021	Email/letter	Sitka Tribe of Alaska	Tribal Entity			
A					N/A	Sitka Tribe of Alaska (STA) is the federally recognized tribal government for more than 4,500 enrolled tribal citizens in Sitka, Alaska, organized under the Indian Reorganization Act of 1934 as amended. STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens and their use of the Sitka Tribe traditional territory. STA provides the following comments on the draft environmental assessment (EA) for the proposed Sitka Seaplane Base (SPB).	Thank you for submitting comments on the proposed project.
B					Cultural	STA's comments and concerns are focused on cultural and subsistence resources and the noise associated with the development and operation of the SPB. Although most of the project uplands were heavily disturbed during the naval base development, there is a high probability of inadvertent discoveries. STA recommends a memorandum of understanding be drafted to address any inadvertent discoveries and require STA to be the first entity contacted in case of an inadvertent discovery. Due to the high potential for inadvertent discoveries, STA requests an archeologist be on site for any construction activities that involve soil disturbance.	CBS and FAA would consult with the tribe on an Inadvertent Discovery Plan to address notifications upon any inadvertent discoveries. The requirement for an archaeologist to be on site will be discussed further with the tribe.

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C					Subsistence	The area was identified as a subsistence shellfish harvest area. Considering this information, ST A requests that any fill used in this project be free of arsenic. While arsenic is a naturally occurring, element found in Southeast Alaska, using fill containing arsenic can contaminate the immediate environment including subsistence resources.	Fill used in the project would be free of contaminatnts that could leach into the marine environment, including arsenic.
D					Noise	Noise associated with the installation and operation of the SPB is a concern. Pile driving creates a significant amount of noise within the water column and can negatively impact marine mammals. Knowing the number of pilings that will be driven would allow STA to assess the project water noise's amount and duration. Unfortunately, the project has not been designed out to a level that would provide this detail.	Noise impacts on marine mammals are discussed in the Draft EA, and more specifically in the Draft Biological Assessment included as Appendix C. Potential harassment of marine mammals would be addressed by obtaining an Incidental Harrassment Authorization (IHA) from the National Marine Fisheries Service Protected Resources Division.
E					N/A	STA receives the Southeast Alaska Regional Health Corporation's (SEARHC) comments on the draft EA. SEARHC' s concerns over the impacts of additional vehicle traffic and floatplane noise on the operation of its existing facilities and future new hospital are real and need to be adequately addressed.	SEARHC comments are being considered and addressed in finalizing the EA.
F					N/A	Due to lack of information and the concerns raised by SEARHC, STA cannot fully support the Sitka SPB' s proposed location at this time.	Thank you for submitting comments on the proposed project.
3	2/28/2021	Email	Paul Lerma	Business			
A					Purpose & Need	In my opinion the New Sitka SPB is long overdue. The fact of the matter is the old seaplane base is functional on a limited basis,it should be condemned as soon as the new one is in place. For the last twenty two years that I have been flying into or around Sitka this place has been avoided because of the unwelcoming Seaplane accommodations, including the fueling situation that is non-existent. Sitka is a beautiful place that all should be able to enjoy. There are many surrounding lake cabins that are only accessible by floatplanes for hunting and camping. Sitka has a healthy tourist industry that includes fishing lodges in need of floatplane operators, Hatchery support, as well a flightseeing industry that is untapped due to a lack of a Seaplane Base. EAS contracts are currently unable to be accommodated efficiently from Sitka. Health and Dental travel for patients is made difficult and more expensive with extra stops in Juneau.	The condition of the existing seaplane base site and need for the project are addressed in the Draft EA.  The potential for social and economic benefits from the project are addressed in the Draft EA.
B					Economic Benefits	In closing, the new seaplane base would give a boost to the local economy through increased employment and tourism, as well as local Alaskans from nearby towns that would stay and use Hotel's, frequent restaurants, Pubs, shops, Bed and Breakfast, Sitka tours and Hatcheries.	The potential for economic benefits from the project are addressed in the Draft EA.
4	2/27/2021	Email	Kevin Mulligan	Business			
A					Purpose & Need	The new seaplane base scheduled to be built on Japonski island is critical infrastructure and needs to be built.	The need for the project as essential infrastructure is addressed in the Draft EA.

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B					Benefits	The base will have a positive impact on many people and numerous outlying communities. The base will provide access to the hospital, airport and businesses in Sitka.	The potential for social and economic benefits from the project are addressed in the Draft EA.
C					Purpose & Need	Floatplanes are a traditional mode of transportation in Southeast Alaska and Sitka has the responsibility to move forward and build the seaplane base. It is long overdue.	The need for the project as essential infrastructure is addressed in the Draft EA.
5	2/26/2021	Email	Dave Gordon	Individual			
A					Purpose & Need	My Name is Dave Gordon. I own a PA-18 on floats and a current user of the existing seaplane base in Sitka. The current seaplane facility is in very poor condition and likely to be condemned in the not so distant future. Without the establishment of the new facility there will soon not be a seaplane base in Sitka. There are a number of remote communities, hatcheries, research facilities, and seasonal lodges that surround Sitka that can only be accessed by floatplane or boat.  With the much reduced and unpredictable ferry service that some of these communities have normally relied upon for delivery of goods and services, and personal transportation, floatplane service has become more essential. The SEARHC facility in Sitka is the health care hub for much of Southeast Alaska. Floatplane service provides the only transportation alternative for these remote communities to access health care services.  Without a seaplane facility in Sitka, remote communities will seek this service elsewhere such Juneau resulting in increased costs for this transportation and loss of revenue and economic activity in Sitka.	The condition of the existing seaplane base site and need for the project are addressed in the Draft EA.  The potential for economic benefits from the project are addressed in the Draft EA.
B					Alternatives	Amphibious floats option: Amphibious floats significantly reduce economic efficiencies of a charter or schedule seaplane service. Amphibious floats are expensive to buy, increases insurance rates, increases maintenance costs and result in a significant loss of payload capacity due to the increased weight of amphibious floats. The high cost of operating on amphibious floats was quoted as one of the reasons a Sitka based operation ceased providing floatplane service several years ago. Amphibious floats can also be dangerous. I am aware of two instances of floatplanes based out of Sitka that landed on water with wheels down resulting in the planes inverted in the water. Fortunately, in these incidents, all survived but there are plenty of examples where people have perished in similar incidents.  Many sites have been evaluated from Herring Cove to Starrigavin Bay the chosen location on Japonski Island for the new seaplane facility is the only viable location on the Sitka road system. No other options exist that meet the requirements of FAA grant funding.	The alternatives evaluated and not carried forward in the Draft EA are documented in the Draft EA, Appendix A.

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C					Noise	<p>Noise impacts to SEARHC and MT Edgecumbe High School: Given the central location of the hospital relative to the airport and seaplane operations in the channel it would seem that noise from channel operations would not be significantly different from airport operations.</p> <p>Based on my operations I estimate at least two-thirds of my take-offs from the channel are to the WNW given prevailing wind conditions. Given the location of the new facility it is more likely take-offs from the channel to the WNW will occur on the northwest side of the channel resulting in significant less noise impact to the Hospital and High School compared to where the current seaplane base is located.</p> <p>With respect to the High School, seaplane operations are highly seasonal with seaplane activity highest during the summer months when school is not in session. Moderate activity would be expected in May and September with minimal seaplane activity throughout the rest of the year. Noise abatement procedures can be developed to further help reduce noise impacts.</p>	Noise impacts would occur but we do not believe that they would substantially impair current or proposed land uses or be incompatible with them.
D					Traffic	Increased traffic on Tongass Ave: Given expected traffic increases due to the seaplane base it would seem insignificant relative to the vehicle traffic associated with hospital operations.	Traffic would increase on Tongass Drive and Seward Avenue but we do not believe that they would substantially impair current or proposed land uses or have adverse impacts on traffic circulation or facility access.
E					Cultural Resources	WW II bunker located at the proposed seaplane base site. The site should be protected if feasible but would I would not agree that this structure in and of itself stop this project from moving forward. I fully appreciate the desire to protect historical sites but there are numerous other WW II bunkers and structures on Japonski and nearby islands to visit to honor and appreciate Sitka's place in the the WW II effort.	It is not feasible to maintain the structure in situ. Consultation with appropriate parties is underway to determine whether the site is eligible for the NRHP and what types of mitigation might be appropriate for the adverse effects on the structure.
F					Marine	Marine fill for seaplane base. Though filling in marine waters will alter the marine habitat where the fill is placed, the new habitat created by the fill can be more diverse with structure and cover for marine fauna and flora. As demonstrated by the construction of the Breakwater and airport runway extension on the east side of the runway, these habitats are quickly colonized by macrophytes and become populated by a variety of marine animal species, such as abalone, shrimp, juvenile fish, and many other organisms that seek the cover of crevices created by rock fill.	There would be some impacts to the marine environmental but we do not believe that these would result in any substantial impairment of the marine environment.
	6	2/26/2021	Email	Richard	Individual		
A					Support	I'm in support of seaplane base. It will provide safer storage for floatplanes and more importantly direct air traffic away from congested boat traffic area.	The need for the project is addressed in the Draft EA.

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Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
7	2/22/2021	Email/letter	SEARHC	Institution			
A					Project Site	The SouthEast Alaska Regional Health Consortium (SEARHC) submits the following comments regarding the Sitka Seaplane Base project at the proposed location at the end of Seward Avenue. During SEARHC's review of the new Sitka Seaplane Base Draft Environmental Assessment, there were significant concerns regarding the site that needs to be addressed.	Thank you for submitting your comments on the Draft EA.
B					Compliance with Tribal Consultation	Moreover, SEARHC objects to the lack of Tribal consultation on this project in violation of the President's Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships (Jan. 26, 2021), Executive Order 13175, and FAA Order 1210.20.	The FAA and CBS initiated consultation with tribes in November 2019 in compliance with FAA, DOT, and Executive Orders.
C						The Sitka Seaplane Base's proposed location is adjacent to SEARHC's Mt. Edgecumbe Medical Center (MEMC) and associated facilities. SEARHC is a Tribal consortium representing 15 federally-recognized Tribes, including the Sitka Tribe of Alaska, that provides health care services to Alaska Natives and other residents throughout Southeast Alaska. MEMC is an acute, specialty, primary, and behavioral-health provider committed to delivering comprehensive medical services to anyone living, working, or visiting Southeast Alaska. MEMC includes a 25-bed critical access hospital with a broad range of medical specialties and primary care services (in close partnership with Alaska's other health facilities) to support a comprehensive spectrum of healthcare and related services. The Emergency Department at MEMC is a Level IV Trauma Center staffed 24 hours a day, seven days a week by board-certified physicians, physician assistants, nurse practitioners, and registered nurses who specialize in care for patients with serious illnesses and injuries.	The institutional facilities located on Seward Avenue south of the site are addressed in the Draft EA.
D					Compliance with Tribal Consultation	After thorough review, the draft environmental study shows a marked lack of consultation with SEARHC and its member Tribes and its impacts on Sitka's healthcare system. This is contrary to the President's January 26, 2021 Memorandum, which requires the head of all federal agencies to develop a plan outlining the steps it will take to implement Executive Order 13175 and ensure robust and meaningful Tribal consultation. It also violates FAA's own Order on Tribal consultation, which requires FAA to consult with Tribes "before taking any action that may significantly or uniquely affect them." Development of this seaplane base at the current proposed location will have detrimental and unmitigable impacts on SEARHC and the Tribes that receive health care services at the MEMC.	The FAA and CBS initiated consultation with tribes in November 2019 in compliance with FAA, DOT, and Executive Orders.

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E						Throughout the environmental study, the Mt. Edgecumbe Medical Center Construction and Expansion Project, a \$300,000,000+ construction project to upgrade the existing Mt. Edgecumbe Hospital to a state-of-the-art healthcare facility with expanded services to meet the demand of local and referred patients across the Southeast, is referenced sparingly and not shown on location drawings relative to the seaplane base project. When mentioned or identified by location arrows, it is in the wrong spot and on the island's wrong side. Several assumptions on the impacts of the proposed facility are based on incorrect locations. Although SEARHC is identified in the report as being consulted on blast effects on historic buildings during construction, there is no mention of the impact on essential behavioral health services located along Seward Avenue.	Figures in the Draft EA will be revised to ensure that the MEMC and the proposed new facilities are shown in their correct locations.
F					Noise	Noise is already a factor with existing plane traffic. At a minimum, it is expected traffic will double, and noise will double with it. There are no noise assessments on existing or future health facilities and notable discrepancies in the noise modeling summary due to the significant difference between the receptor location and the new hospital site. The noise modeling summary suggests a compatible noise level for adjacent uses; however, this does not align with the World Health Organization or Environmental Protection Agency's maximum suggested levels of 40 dBs for hospital rooms and 30-40 max at night. There are no hours of use restrictions or any other noise control mandated on pilots or planes. The initial hearing indicated there would be voluntary pilot control for noise. This seems inconsistent given the summer daylight hours and the quiet hours mandated for hospital patients. Summer feasibility would allow dawn to dusk operations from approximately 4 a.m. to 11 p.m., contradicting with hospital quiet times from 7 p.m. to 7 a.m. Hospital zones are quiet zones to allow for healing. There was no mention of the possibility of sound attenuation cost subsidies to mitigate and reduce sound.	CBS conducted a seaplane noise analysis to address the potential for noise impacts on adjacent land uses. This study found that the average noise level would not be incompatible with health care land uses (<65 DNL outdoors). Assuming SEARHC plans to construct an energy efficient hospital, noise levels inside should be in the 30-40 DNL range. CBS and pilots have agreed to consult with SEARHC regarding potential "fly friendly" programs and measures for the seaplane base. Noise levels at night would be lower than the average calculated in the noise study, as operations would not occur in the dark.

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G					Traffic	The assessment mentions traffic impact generally without any apparent study. It is noted that the "intensity of land use would change resulting in additional vehicular traffic" and "traffic would increase, but traffic noise is not expected to increase substantially." The assessment and summary do not detail how they arrived at these conclusions. All activity associated with the proposed location will be adjacent to Behavioral Health, counseling facilities, and a residential treatment facility for youth. There is a long list of concerns associated with those programs' nature and access to commercial activities. Due to the proposed location, there is also major concern regarding emergency department access for vehicular traffic. First responders must always be able to access the community's only emergency room located off Tongass Drive. Additional seaplane base traffic, including haul out of planes or wings, tourist transportation, fuel maintenance, etc., may slow or impede emergency responders' route.	Traffic was assessed qualitatively based on survey data from potential seaplane base users. Given the scale of the facility, detailed quantitative analysis is not justified. Current traffic volumes on Tongass and Seward Avenue on an average annual basis are reported at 200 vehicles per day per ADOT&PF. An increase of 12 one-way trips would be a 6% increase in traffic. This traffic would be spread over the entire day, not during peak periods. There is no evidence that this level of additional traffic would have any adverse effects on traffic circulation, emergency access, or access to other facilities.
H					Land Use	SEARHC is committed to providing high-quality healthcare to Sitka residents, and per the recent acquisition with city-owned Sitka Community Hospital bound to the construction of a new facility on SEARHC owned parcels within the affected area. There is concern that the commercial development of the proposed parcel at the end of Seward Avenue would obstruct the essential use of the adjacent properties for public health.	The noise and traffic analysis do not support the premise that there would be substantial adverse effects on SEARHC facilities or programs, or that the proposed facilities would obstruct use of the SEARHC site for a new hospital.
I					Public Outreach	To date, SEARHC has not been officially approached for comment as an adjacent property owner. We continue to request that this project undergo a thorough impact study and provide mitigation to resolve the effects or select a different development site.	SEARHC representatives have been on the project mailing list since 2019 and attended the public meeting in 2019 and the most recent meeting in February 2021.
J					Tribal Consultation	By separate letter, we will also request a formal and ongoing Tribal consultation with the FAA on this project.	The FAA and CBS are happy to consult with tribal entities to discuss potential effects of the project.
8	2/19/2021	Email	Ivan Grutter	Individual			
A					Project Support - Need	Bummed I couldn't make the meeting. Dave Gordon filled me in. I'm in total support of the new floatplane dock. I kept my floatplane at the current dock for a few years, but had a lot of trouble with birds and low tide. Ended up building a boat ramp at my house on hpr to Launch from, which doesn't always work well either dew to tides and weather. Sure would be nice to have a stall in the channel again! Especially since I am currently upgrading to a bigger plane. Hope we can make it happen.	The condition of the existing seaplane base site and need for the project are addressed in the Draft EA.

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Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
9	2/18/2021	Email	Nicole Johnson	Individual			
A					Project Support - Need	My name is Nickie Johnson and I'd like to submit comments for the Sitka Seaplane Base. I am a pilot and aircraft mechanic. I work on several of the aircraft that currently use the seaplane dock. Many times I have been called down there to do unscheduled maintenance or troubleshooting. I'm well acquainted with the dock, it's hazards, and the positive impact a new SPB will have. To begin with, the dock is often slippery creating a safety issue for both myself and the pilots. The slickness is a combination of the old wood and bird droppings from the seagulls that frequent the seafood processing area. A new seaplane base would create a much safer workspace for both myself and the pilots.	The condition of the existing seaplane base site and need for the project are addressed in the Draft EA.
					Project Support - economic	Additionally, at least 60% if not more of the planes I work on are seaplanes. The new SPB would bring in more aircraft to the area and subsequently more maintenance work, which would directly benefit the aircraft maintenance technicians in Sitka and create more job opportunities. Fuel sales would increase which would be an additional economic boost to the community. I know many people have already commented on the benefits of seaplane travel in Southeast Alaska. I want to add my voice to the mix. The planes I work on offer travel for people seeking medical treatment. They transport food, mail, and other needed supplies to off road communities. They support the fishing industry. They also offer access to recreational opportunities for both locals and visitors. They are an important part of our history, culture, and economic success in Southeast Alaska. I know Kevin touched on educational opportunities the SPB can provide. I'd like to expand on his comments. I spent 10 years of my career working in aviation education and continue to volunteer to mentor kids interested in aviation today. There is both a shortage of pilots and aircraft mechanics throughout our country. The first step in filling this gap is increasing exposure to aviation. The SPB would offer many opportunities for that. There is a small but growing population of kids in Sitka that are fascinated with aviation. This base would open more opportunities for them to get connected and involved with the aviation community. Whether through the Civil Air Patrol, mentorship, high school programs, or involvement with the University, this base could open a variety of educational and skill building opportunities for the youth in this community. I am excited to see the progression of this project. I know it's a lot of work, and I am grateful to the team taking on the challenge. Thank you for your hard work. The aviation community is very appreciative.	The potential for economic benefits from the project are addressed in the Draft EA.
B							

Sitka SPB Draft EA Comments

Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
10	2/18/2021	Email	Harvey Brandt	Individual			
A					Project Support - cultural	94% paid for by the FEDS. WOW! What reason is there to reject this project? I am an historian. I have worked HARD over the years to get WW II history/artifacts, story recognized and officially, properly written as per the Sitka vicinity. I worked with a committee to establish a State Park on the archipelago from the airport through to Maknati Island celebrating, commemorating the WW II history of Sitka. I believe that history is important. That State Park has multiple items, artifacts, structures commemorating WWII. HOWEVER, WE DON'T NEED TO SAVE EVERY SINGLE PIECE OF CONCRETE AND EVERY SINGLE REMNANT OF WWII. I am concerned that with all the concern over saving this WW II era observation post (Daily Sitka Sentinel -- front page -- photo/article. --- Feb 9, 2021)... that somehow or another this STOPS or substantially DELAYS a needed infrastructure project from proceeding forward. I love history. I am passionate about history. I have taught and written history for over 50 years. I have worked hard to save history, BUT, BUT there are limits to HOW MUCH of these artifacts must be saved.	CBS will consult with appropriate consulting parties to address the eligibility of the observation post to the National Register, and if eligible, the adverse effect on the post from the project. Consultations will address the need for and the appropriate mitigation for addressing impacts on this cultural resource.
B					Project Support - economic	I am very, very concerned about our Sitka economy, our Alaskan economy. My wife and I have made our home here. We are retired here. We have grandchildren growing up here who love Alaska and want to live here as adults and they need jobs. We need to build Sitka for the future. Fantasizing about this or that does not create jobs. We already have SAVED many, many WW II artifacts in the state park already established. Please move on.	The potential for economic benefits from the project are addressed in the Draft EA.
11	2/17/2021	Email	Kevin Knox	CBS Assembly			
A					Project Components	Good work tonight. Thanks to you and the team for a very thorough and well presented report. Something that I thought of today about the facility for the design considerations. As a future innovation we might want to look at providing power capacity to charge EV batteries. As a rapidly evolving power alternative there are very advanced systems being tested as a commercial flight option. Not sure if you have seen the evolution of the Harbour Air De Havilland Beaver powered by an all electric motor. It is pretty impressive and the development of other flight power systems by Magnix is growing quickly. (Cessna Caravan, De Havilland Beaver, Eviation Alice, Dash 8 twins and reportedly a smaller motor for 180/185 sized aircraft). Anyway, having the option or the potential option there for that kind of charging potential might be wise... Thanks again for all your work on this project!	The project team will consider this during detailed design.

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Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
12	2/17/2021	Email	Jeannie Frank	Individual			
A					Project Support - project need	I just want to chime in and say that I am really hoping the float dock gets replaced in Sitka. While flying with friends the dock was not in good shape at all. It is dangerous and a huge liability. I am glad I owned a wheeled airplane because I was not afraid my tie down would go under water and sink my airplane along with the old structure. I have heard comments from pilots in Washington about Sitka float plane dock. That is pretty bad. If you want to attract tourism and good money spent in town this would help. The waterway is very crowded with boat and landing seemed dicey and too much to share with everyone. I am glad to see the proposed dock more towards the end of the harbor and Coast Guard station. As an airplane owner myself it was frustrating that I paid more in personally property tax for my airplane than a boat owner with a boats with extremely higher value. Boat docks have facilities like restrooms and showers yet the decrepit float plane dock does not have any amenities. I don't think the situation was fare. Yes fishing is a big draw for money but aviation can bring in people with money to spend as well. Tax revenue would really increase. I would really be glad to see a new dock going in for safety at the very least.	The condition of the existing seaplane base site and need for the project are addressed in the Draft EA.
13	2/17/2021	Email	John Murray	Individual			
A					Cost of Project	I've went through part of the Plan for SPB and was struck on how much the cost increased. The last time I looked it was 9 million plus now its 54 million. That leaves a share of 3.5 million for the CB of Sitka. When you add in the inevitable cost overruns, its a big outlay for Sitka. I also question the economic benefit to Sitka businesses of 800k yearly. We have a very small number of float planes in Sitka ,who can only be charged so much for use of the float plane dock. I don't believe the adage " build it and they will come" works here either. This plan needs to be pared down or rebuild the existing site without all the bells and whistles. One last thing for cost comparisons ANB harbor replacement estimated cost 7.5 million. Crescent harbor rebuilt Phase one estimated at 14 million. Sitka just cannot afford to lay out that kind of cash currently I believe.	Seaplane transportation is an essential transportation service not just for Sitka, but for surrounding communities. CBS has evaluated the potential social and economic effects of the project and has identified a new seaplane base as a priority project for the City.  Additional information was provided to the commentor regarding the project ROM cost at \$19.9 million (project cost, not construction cost; includes additional 35% to cover planning, design, permitting, project & construction management, inspections, bidding, etc.).  Please note some of the early design options and associated ROMs had higher costs. We kept working on the concept to get the best value – most for the least.

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Number/ID	Date	Mode	Name	Classification	Topic	Comment	Response
14	2/17/2021	Email	Becky Larsen	Individual			
A					Opposition - wildlife	I am against the Seaplanes Base being built on Japonski Island for several reasons. One of them are the wildlife animals, the Eagles nest, other wild birds nest, and other wildlife that has taken over in that area. before they built more buildings near the airport. there's been lots of wildlife seeing on that Island. So far all my life since I grew up & raised on Mt.Edgecumbe (Japonski) Island, I have seen & heard of Minks, Otters, Deers, Sea lions, many birds of all kinds, the other day they saw a Bear. The housing that housed many teachers,DR.family & still is.	There are no know eagle nests on the site. This project would remove less than 2 acres of upland habitats that are common in the Sitka area.
					Social	On a personal note, today (2-17-19) as of two years ago my Brother "Shorty" Larsenn drowned ten ft. from shore on high tide in that lil cove. He passed away on my Mom's Birthday 2-17-19. from a drowning accident. To this day it is very heart breaking for her.My Mom, my Sister & I were devastated to hear they were going to build a Seaplane base. We even asked permission from Searhc to put his Cross on the rock couple years ago. My Brothers & our family built a Russian Cross for my brother Shorty Larsen, & built it to withstand 60 MPH winds & more. Also to have My Mom Grace Larsen have a place to go where she lost her Son Shorty.. To her, seeing his cross on that rock means so much to her, to her it makes her feel inside he's nearby her.To her she has that peaceful place to go to & knowing it won't be vandalized.	We are not aware of a cross anywhere in the vicinity of the proposed seaplane base. If SEARHC provided permission for the cross, it likely is not located within the boundaries of the proposed site.
					Opposition - multiple reasons	If that base is built, it will ruin everything, from wildlife, more vandalism, homes & peaceful place for my Mom to visit his cross. It's her Birthday today & two years since my brother past. Thank You for taking time to read my concern & I am against seaplane base to be built there, for several reasons. Please don't move his cross. His final resting place.	Impacts on wildlife are expected to be minimal and there is no evidence that this would increase vandalism in the area. We do not believe that the cross mentioned is on the project site.
C							

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# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



March 4, 2021

Kelli Cropper  
Project Manager  
City and Borough of Sitka  
100 Lincoln Street  
Sitka, AK 99835

RE: Sitka Tribe Comments on the Draft EA for the Proposed Sitka Seaplane Base

Dear Ms. Cropper,

Sitka Tribe of Alaska (STA) is the federally recognized tribal government for more than 4,500 enrolled tribal citizens in Sitka, Alaska, organized under the Indian Reorganization Act of 1934 as amended. STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens and their use of the Sitka Tribe traditional territory. STA provides the following comments on the draft environmental assessment (EA) for the proposed Sitka Seaplane Base (SPB).

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The area was identified as a subsistence shellfish harvest area. Considering this information, STA requests that any fill used in this project be free of arsenic. While arsenic is a naturally occurring element found in Southeast Alaska, using fill containing arsenic can contaminate the immediate environment including subsistence resources.

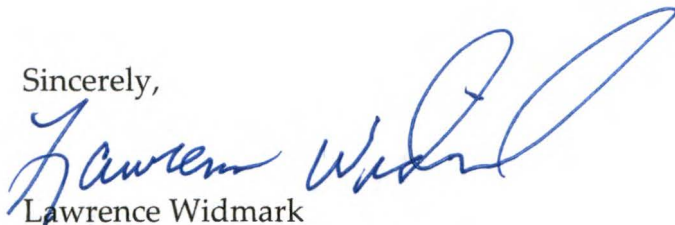
Noise associated with the installation and operation of the SPB is a concern. Pile driving creates a significant amount of noise within the water column and can negatively impact marine mammals. Knowing the number of pilings that will be driven would allow STA to assess the project water noise's amount and duration. Unfortunately, the project has not been designed out to a level that would provide this detail.

STA receives the Southeast Alaska Regional Health Corporation's (SEARHC) comments on the draft EA. SEARHC's concerns over the impacts of additional vehicle traffic and floatplane noise on the operation of its existing facilities and future new hospital are real and need to be adequately addressed.

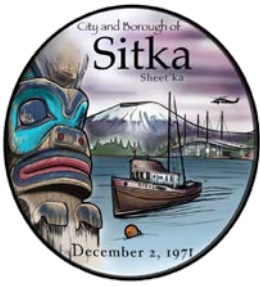
Due to lack of information and the concerns raised by SEARHC, STA cannot fully support the Sitka SPB's proposed location at this time.

If you have any questions regarding these comments, contact STA's Resource Protection Director Jeff Feldpausch at (907) 747-7469 or email [jeff.feldpausch@sitkatriben-sn.gov](mailto:jeff.feldpausch@sitkatriben-sn.gov).

Sincerely,



Lawrence Widmark  
Tribal Chairman



# City and Borough of Sitka

PROVIDING FOR TODAY...PREPARING FOR TOMORROW

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March 25, 2021

**VIA CERTIFIED MAIL & EMAIL**  
**[lisa.gassman@sitkatriben-sn.gov](mailto:lisa.gassman@sitkatriben-sn.gov)**

Lisa Gassman  
General Manager  
Sitka Tribe of Alaska  
465 Katlian Street  
Sitka, Alaska 99835

Re: March 19, 2021 Consultation Meeting regarding the proposed new Sitka Seaplane Base Environmental Assessment

Dear Ms. Gassman,

Thank you for the opportunity to meet with members of the Sitka Tribe of Alaska (STA), Federal Aviation Administration (FAA), and Southeast Alaska Regional Health Consortium (SEARHC) in consultation regarding STA recommendations and concerns to the proposed new seaplane base (SPB) to be located at the north end of Japonski Island.

Regarding Cultural Resources, STA recommended STA and the City and Borough of Sitka (CBS) establish a Memorandum of Understanding (MOU) addressing inadvertent discoveries with STA being the first entity notified and an Archeologist on site during soil disturbance.

With FAA approval, we propose that contingency language be added to the Environmental Assessment (EA) and the Finding of No Significant Impact (FONSI) committing to having a Tribal Monitor and an Archeologist on site during specific soil disturbance activities. Tribal Monitoring during soil disturbance would accomplish STA being the first entity notified should there be an inadvertent discovery. The Tribal Monitor and Archeologist scope of work would be clearly defined during design and prior to construction and costs for these services would be included in the FAA AIP Construction Grant Application.

Regarding Subsistence Resources, we will be using clean fill material from a local quarry.

The information regarding construction and noise impacts to Marine Mammals is located in the DRAFT EA Appendix C. CBS will be required to obtain an Incidental Harassment Authorization under the Marine Mammal Protection Act prior to any pile driving in marine waters. CBS is working with the National Marine Fisheries Service on this but needs more in-depth construction details to complete the permit application. Those details would be developed in the detailed design phase of the project, the phase we hope to begin upon receiving a FONSI from the FAA.

CBS would also like to solicit STA's input on any marine habitat improvement projects that might be appropriate for compensatory mitigation for the fill in marine waters if the US Army Corps of Engineers requires compensatory mitigation as part of their Section 404 and Section 10 permits.

Administration, 100 Lincoln Street, Sitka, Alaska 99835  
907-747-1812 [administrator@cityofsitka.org](mailto:administrator@cityofsitka.org)

STA also reiterated SEARHC's concerns regarding aircraft noise and additional traffic on Tongass Drive and North Seward Avenue. The CBS and DOWL have collected some additional information including more detailed operations projected from the entity expected to be the largest commercial user of the SPB and have updated the Noise Study and developed a Traffic Memo to document our analysis of potential effects. These studies take a conservative approach to analyzing potential impacts, evaluating impacts on the projected peak day – a hypothetically busy day that would result in the highest potential impact. This conservative estimate is not the impact that is likely to occur, but more of a worst-case analysis of potential impact.

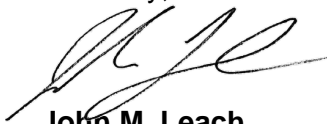
The noise analysis of the peak day shows that the overall average noise exposure from the proposed facility would not exceed the land use compatibility guidance levels for residences, schools, hospitals, or clinics at any of the facilities located on the west side of Sitka Channel. The highest level would be 64 dB DNL at the Mount Edgecumbe High School, but this peak day is expected to occur in the summer when school is not in session. Outside noise levels at the existing and proposed SEARHC hospital sites would be below 60 dB DNL.

For the traffic analysis, the analysis is doubly conservative in that existing traffic levels are likely underestimated (do not consider the traffic generated by non-employees, patients, visitors, vendors, etc.) and projected project traffic is likely over-estimated (conservative traffic generation rates used). The average daily traffic estimate is only 21 vehicles per day, which is a minor addition to current traffic on Tongass Drive and Seward Avenue. The worst-case traffic estimate in the summer on the 'peak' day is 136 vehicle trips per day.

Traffic impacts are typically assessed looking at peak hour rates. Thorough traffic analysis and mitigation is generally not required for projects that generate less than 100 vehicle trips in the peak hour. Since this project would only reach 136 vehicle trips on the peak day (spread over a 10-hour period), no traffic mitigation would be required.

Again, we appreciate STA organizing the consultation meeting and we look forward to working with you further as we move into design and final permitting and eventually construction of this needed public infrastructure project.

Sincerely,



**John M. Leach**  
Municipal Administrator

Enclosures: DOWL Noise Re-evaluation  
DOWL Revised Traffic Generation Estimates

cc: Via email only:  
Michael Harmon, Public Works Director ([michael.harmon@cityofsitka.org](mailto:michael.harmon@cityofsitka.org))  
Charles Clement, SEARHC President & CEO ([cclement@searhc.org](mailto:cclement@searhc.org))  
Jack Gilbertsen, Environmental Specialist, FAA ([jack.gilbertsen@faa.gov](mailto:jack.gilbertsen@faa.gov))



# MEMORANDUM

TO: Kelli Cropper, CBS, Project Manager  
FROM: Ken Nichols, PE, Sr. Aviation Engineer  
DATE: March 24, 2021  
SUBJECT: Sitka SPB – Noise Re-Evaluation

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Seaplane operations at the proposed Sitka Seaplane Base (SPB) will be well below the level at which Federal Aviation Administration (FAA) environmental review guidelines call for noise analysis. Noise analysis is generally required when flight operations would exceed 90,000 operations annually, or 243 operations per day.

Although the proposed SPB operations would fall well below this threshold, concerns raised about noise impacts on facilities on the west shore of Sitka Channel were raised during scoping and therefore noise analysis was conducted for the Draft Environmental Assessment (EA) released in January 2021. Noise impacts from the proposed SPB were modeled using the FAA's Aviation Environmental Design Tool (AEDT) version 3C. The noise analysis documented that average noise levels on the west shore of the channel would be below the 65 dB Day-Night Level (DNL) and would therefore be considered compatible with the types of uses located there. The DNL level has been correlated with land use compatibility over decades and was most recently documented as the most appropriate measure for long-term noise land use compatibility in an FAA report to Congress in 2020.

After the Draft EA was released to the public, CBS and DOWL staff followed up with the largest commercial seaplane operator to confirm projected operations levels. The operator indicated that they would increase their projected operations levels beyond what had been provided earlier in the study process, due to increased interest from potential customers. With this information, the aircraft noise analysis was updated from what was provided in the Draft EA.

This memo presents the revised analysis using higher commercial operations on the peak operations day. Peak aircraft traffic would be estimated to occur during summer, as some planes would be used only seasonally and even year-round operators would be expected to have more operations during the summer. The model was run with 92 peak day operations. (A takeoff is an operation and a landing is another operation, so 92 operations equates to 46 flights per day.)

As shown in the attached figure, this increase in operations did result in a change in the noise contours and DNL levels at the facilities on the west shore of Sitka Channel, but noise levels at each facility were still below the 65 dB DNL level, and still within the compatible land use guidelines.

These peak day levels are a conservative estimate, and it is unlikely that every aircraft (and transient aircraft) would operate on the peak day. Therefore, actual peak noise levels are likely to be lower than those calculated in the model. This does not mean that there would be no noise impacts, as individual operations may result in short-term noise impacts depending on the operation, the weather, and other conditions. However, overall noise levels associated with the seaplane base are not anticipated to result in significant noise impacts, particularly when considered in the context of existing aviation operations on Japonski Island.

Table 1. Estimated Aircraft Operations

Aircraft Tie-Down	Service Type	Aircraft	Annual Ops	Peak Season Ops	Peak Season Peak Day Ops
Tie-Down 1	Commercial	1	180	90	4
Tie-Down 2	Commercial	2	1000	500	16
Tie-Down 3	Commercial	3	2400	1200	40
Tie-Down 4	Private	1	60	30	2
Tie-Down 5	Private	1	63	32	2
Tie-Down 6	Private	1	40	20	2
Tie-Down 7	Private	1	80	40	2
Tie-Down 8	Private	1	40	20	2
Tie-Down 9	Private	1	40	20	2
Tie-Down 10	Private	1	40	20	2
Tie-Down 11	Private	1	60	30	2
Tie-Down 12	Private	1	200	100	4
Tie-Down 13	Private	1	39	20	2
Tie-Down 14	Private	1	40	20	2
Transient Slips (4)	Either		600	300	8
Total					92

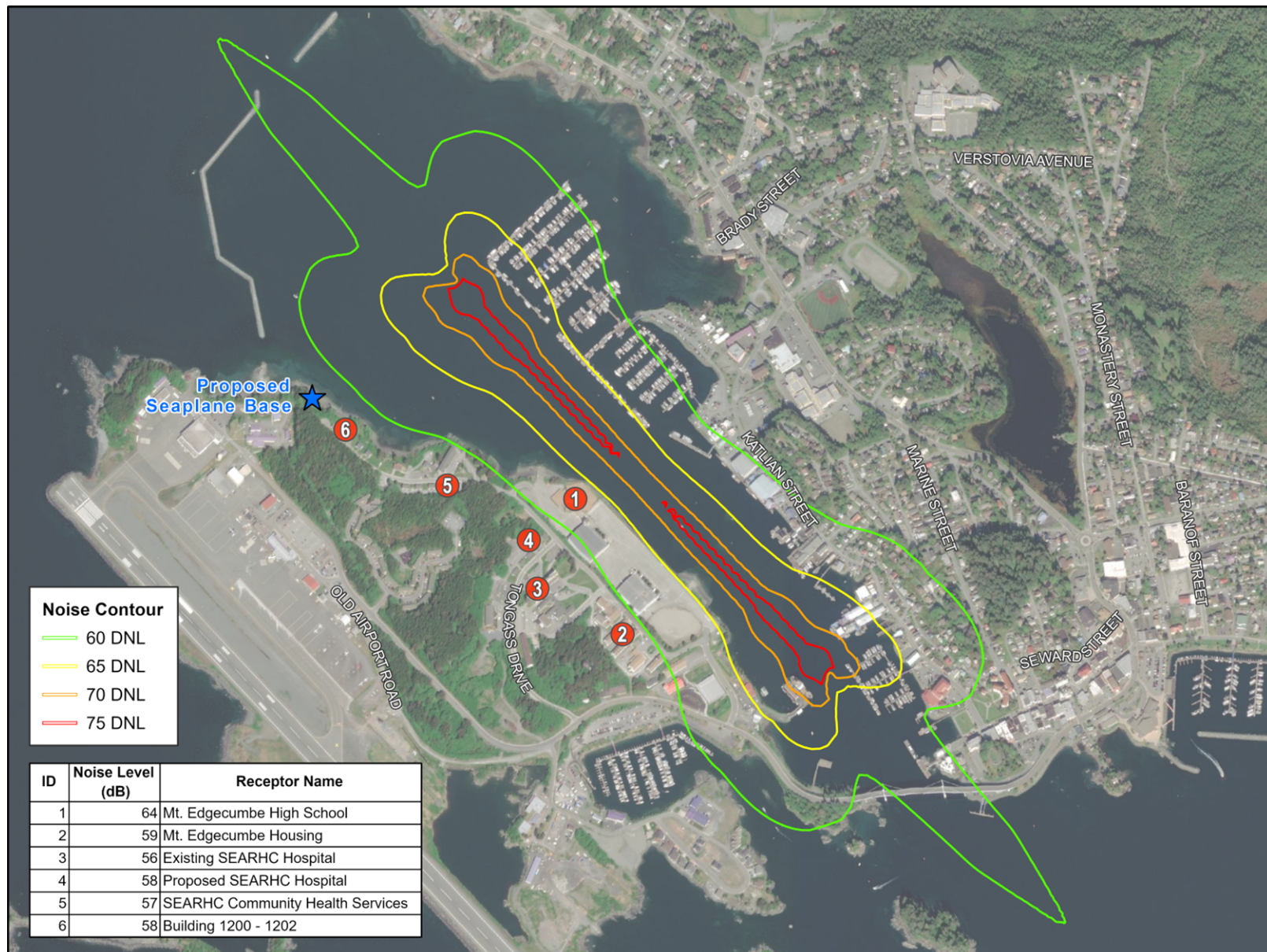


Figure 1 Noise Impacts – Peak Season, Peak Day (Created with AEDT 3C)

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## MEMORANDUM

TO: Kelli Cropper, CBS Project Manager  
FROM: Maryellen Tuttell, DOWL Environmental Lead  
DATE: March 25, 2021  
SUBJECT: Sitka SPB: Revised Traffic Generation Estimates

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The proposed Sitka Seaplane Base is to be located at the north end of Seward Avenue on Japonski Island in Sitka. The seaplane base would be accessed by Airport Road, via Tongass Drive and Seward Avenue.

SEARHC's Mount Edgecumbe Medical Center (MEMC) is accessed from Airport Road via Tongass Drive. Its Emergency Services area is accessed from Seward Avenue south of the Tongass/Seward intersection. Other SEARHC facilities are located on Tongass Drive and Seward Avenue north of Tongass Drive, including clinics and administrative facilities.

Reliable traffic volume data on Tongass Drive and Seward Avenue are not available.

There are a number of parking areas along Tongass Drive and Seward Avenue, used primarily for SEARHC facilities (although Mount Edgecumbe High School also has a staff parking area off Seward Avenue along with the Superintendent's residence). City and Borough of Sitka (CBS) conducted a parking inventory at mid-day on Thursday, March 18, to document the number of parking spaces available and point in time usage. Figure 1 illustrates the results of the parking inventory. These parking areas total 442 parking spaces. If these 442 spaces were at capacity on a peak day with no parking turn over during the day, this would indicate a minimum traffic level of at least 884 vehicles per day on Tongass Drive (one trip in and one trip out by parking space). This conservatively low traffic estimate is based on employees commuting to work locations and does not account for patient in and out traffic throughout the day, or for staff that may need to leave and return at some point during the day. CBS counted 53 vehicle trips on Tongass Drive over a 36-minute period while doing the parking inventory, assumed to be mostly patient traffic (as opposed to employee traffic). Therefore, traffic levels on Tongass Drive are likely much higher than the 884 estimated trips.

Traffic levels on Seward Avenue would be expected to be less than on Tongass Drive. Parking areas requiring access via Seward Avenue north of Tongass Drive total 130 spaces. Conservatively assuming one trip in and one trip out for each space, and no turnover of parking during the day, there would be an estimated 260 vehicle trips on Seward Avenue per day. Again, this estimate is likely lower than actual traffic levels.

No trip generation rates are available for seaplane bases. The Institute for Traffic Engineering (ITE) has extremely limited data on general aviation airports and that is based on employee numbers, which would not be relevant here. Instead, CBS queried pilots that had signed interest slips on using the site regarding their type of use (commercial vs. non-commercial, their anticipated flight operations, and the estimated vehicle trips per day). Most pilots indicated that they would use the site only seasonally and would generate one vehicle round trip per flight, which counts as two one-way vehicle trips. A round trip flight counts as two aircraft operations, takeoff and landing so this results in one one-way trip generated per operation.

Vehicle trips per aircraft operation were estimated conservatively, assuming that smaller commercial operations would have 2 one-way vehicle trips per aircraft operation (one for each

takeoff and each landing). This assumes that someone would drive a person out to the plane and drop them off and then leave, making another round trip to pick the person up later. Larger commercial aircraft with more frequent operations were estimated at 1.5 one-way vehicle trips per operation. The larger commercial operations would be supported by passenger vans which would likely drop off and pick up passengers from multiple trips in one visit. Private aircraft are more likely to have only one vehicle trip per flight (two operations – takeoff and landing). Based on the annual operations estimate from interested pilots, vehicle trips would total 7,562 annually, or a daily average of 21 one-way vehicle trips. (Table 1).

Peak day traffic would be estimated to occur during summer, as some planes would be used only seasonally and even year-round operators would be expected to have more operations during the summer. Peak day aircraft operations are estimated at 92 operations per day (46 trips). Vehicle trips associated with **peak-day** operations are estimated at 136 vehicle trips (Table 2).

Traffic analysis is typically not required for development that generates below **100 trips during the peak hour**. It is likely that many if not most of these trips would not occur during peak hours, as the use would be spread over the entire day. Much of this use would occur on weekends, when traffic to MEHS and the SEARHC administrative facilities would be lower. Given the average daily trip estimate is 21, peak hour generation would be less than 21 trips. Even with a **peak day** estimate of 136 trips, there would not be 100 trips during the peak hour.

The level of estimated additional traffic would not be expected to have any substantive impact on traffic circulation or congestion on Tongass Drive or Seward Avenue, or on emergency access to the hospital facility.

**Table 1. Estimated Vehicle Trips By Aircraft Operation and Average Daily Vehicle Trips**

Aircraft Tie-Down	Service Type	# Aircraft	#Annual Ops	VT/Operation	Total Annual VT
Tie-Down 1	Commercial	1	180	2	360
Tie-Down 2	Commercial	2	1000	2	2000
Tie-Down 3	Commercial	3	2400	1.5	3600
Tie-Down 4	Private	1	60	1	60
Tie-Down 5	Private	1	63	1	63
Tie-Down 6	Private	1	40	1	40
Tie-Down 7	Private	1	80	1	80
Tie-Down 8	Private	1	40	1	40
Tie-Down 9	Private	1	40	1	40
Tie-Down 10	Private	1	40	1	40
Tie-Down 11	Private	1	60	1	60
Tie-Down 12	Private	1	200	1	200
Tie-Down 13	Private	1	39	1	39
Tie-Down 14	Private	1	40	1	40
Transient Slips (4)	Either		600	1.5	900
<b>Total Estimated Annual Aircraft Operations</b>			<b>4,882</b>		
<b>&amp; Annual Vehicle Trips</b>					<b>7,562</b>
<b>Total Estimated Average Daily Aircraft Operations &amp; Vehicle Trips</b>					<b>21</b>

**Table 2. Estimated Vehicle Trips By Peak Day Aircraft Operations**

<b>Aircraft Tie-Down</b>	<b>Service Type</b>	<b># Aircraft</b>	<b>Operations</b>	<b>VT/Operation</b>	<b>Total VT – Peak Day</b>
Tie-Down 1	Commercial	1	4	2	8
Tie-Down 2	Commercial	2	16	2	32
Tie-Down 3	Commercial	3	40	1.5	60
Tie-Down 4	Private	1	2	1	2
Tie-Down 5	Private	1	2	1	2
Tie-Down 6	Private	1	2	1	2
Tie-Down 7	Private	1	2	1	2
Tie-Down 8	Private	1	2	1	2
Tie-Down 9	Private	1	2	1	2
Tie-Down 10	Private	1	2	1	2
Tie-Down 11	Private	1	2	1	2
Tie-Down 12	Private	1	4	1	4
Tie-Down 13	Private	1	2	1	2
Tie-Down 14	Private	1	2	1	2
Transient Slips (4)	Either		8	1.5	12
<b>Estimated Peak Day Aircraft Operations &amp; Vehicle Trips</b>			<b>92</b>		<b>136</b>



Figure 1. Parking Inventory – Tongass Drive and Seward Avenue

February 22, 2021

Ms. Kelli Cropper  
Project Manager  
City and Borough of Sitka  
100 Lincoln Street  
Sitka, AK 99835

Dear Ms. Cropper,

The SouthEast Alaska Regional Health Consortium (SEARHC) submits the following comments regarding the Sitka Seaplane Base project at the proposed location at the end of Seward Avenue. During SEARHC's review of the new Sitka Seaplane Base Draft Environmental Assessment, there were significant concerns regarding the site that needs to be addressed. Moreover, SEARHC objects to the lack of Tribal consultation on this project in violation of the President's Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships (Jan. 26, 2021), Executive Order 13175, and FAA Order 1210.20.

The Sitka Seaplane Base's proposed location is adjacent to SEARHC's Mt. Edgecumbe Medical Center (MEMC) and associated facilities. SEARHC is a Tribal consortium representing 15 federally-recognized Tribes, including the Sitka Tribe of Alaska, that provides health care services to Alaska Natives and other residents throughout Southeast Alaska. MEMC is an acute, specialty, primary, and behavioral-health provider committed to delivering comprehensive medical services to anyone living, working, or visiting Southeast Alaska. MEMC includes a 25-bed critical access hospital with a broad range of medical specialties and primary care services (in close partnership with Alaska's other health facilities) to support a comprehensive spectrum of healthcare and related services. The Emergency Department at MEMC is a Level IV Trauma Center staffed 24 hours a day, seven days a week by board-certified physicians, physician assistants, nurse practitioners, and registered nurses who specialize in care for patients with serious illnesses and injuries.

After thorough review, the draft environmental study shows a marked lack of consultation with SEARHC and its member Tribes and its impacts on Sitka's healthcare system. This is contrary to the President's January 26, 2021 Memorandum, which requires the head of all federal agencies to develop a plan outlining the steps it will take to implement Executive Order 13175 and ensure robust and meaningful Tribal consultation. It also violates FAA's own Order on Tribal consultation, which requires FAA to consult with Tribes "before taking any action that may significantly or uniquely affect them." Development of this seaplane base at the current proposed location will have detrimental and unmitigable impacts on SEARHC and the Tribes that receive health care services at the MEMC.

Throughout the environmental study, the Mt. Edgecumbe Medical Center Construction and Expansion Project, a \$300,000,000+ construction project to upgrade the existing Mt. Edgecumbe Hospital to a state-of-the-art healthcare facility with expanded services to meet the demand of local and referred patients across the Southeast, is referenced sparingly and not shown on location drawings relative to the seaplane base project. When mentioned or identified by location arrows, it is in the wrong spot and on the island's wrong side. Several assumptions on the impacts of the proposed facility are based on incorrect locations. Although SEARHC is identified in the report as being consulted on blast effects on

historic buildings during construction, there is no mention of the impact on essential behavioral health services located along Seward Avenue.

The City and Borough of Sitka proposed floatplane base site selection for Seward Avenue was first selected in 2000 and reaffirmed in 2016 (site studies conducted in 2002, 2012, and 2016). This selection was prior to SEARHC's venture to provide a new community hospital on Seward and Tongass Avenue, adjacent to the proposed site. The expansion project, including the new 250,000 square foot healthcare facility will significantly impact existing infrastructure, and assumptions such as utility availability referenced in the report may no longer be accurate. The assessment quotes electrical capacity ranges from 2015 that are no longer valid and have been revised downward. Site dismissals based on the previous studies do not include the new facility. The proposed project does not recognize the need for increased healthcare services in the community and facility planning underway.

Noise is already a factor with existing plane traffic. At a minimum, it is expected traffic will double, and noise will double with it. There are no noise assessments on existing or future health facilities and notable discrepancies in the noise modeling summary due to the significant difference between the receptor location and the new hospital site. The noise modeling summary suggests a compatible noise level for adjacent uses; however, this does not align with the World Health Organization or Environmental Protection Agency's maximum suggested levels of 40 dBs for hospital rooms and 30-40 max at night.

There are no hours of use restrictions or any other noise control mandated on pilots or planes. The initial hearing indicated there would be voluntary pilot control for noise. This seems inconsistent given the summer daylight hours and the quiet hours mandated for hospital patients. Summer feasibility would allow dawn to dusk operations from approximately 4 a.m. to 11 p.m., contradicting with hospital quiet times from 7 p.m. to 7 a.m. Hospital zones are quiet zones to allow for healing. There was no mention of the possibility of sound attenuation cost subsidies to mitigate and reduce sound.

The assessment mentions traffic impact generally without any apparent study. It is noted that the "intensity of land use would change resulting in additional vehicular traffic" and "traffic would increase, but traffic noise is not expected to increase substantially." The assessment and summary do not detail how they arrived at these conclusions. All activity associated with the proposed location will be adjacent to Behavioral Health, counseling facilities, and a residential treatment facility for youth. There is a long list of concerns associated with those programs' nature and access to commercial activities.

Due to the proposed location, there is also major concern regarding emergency department access for vehicular traffic. First responders must always be able to access the community's only emergency room located off Tongass Drive. Additional seaplane base traffic, including haul out of planes or wings, tourist transportation, fuel maintenance, etc., may slow or impede emergency responders' route.

SEARHC is committed to providing high-quality healthcare to Sitka residents, and per the recent acquisition with city-owned Sitka Community Hospital bound to the construction of a new facility on SEARHC owned parcels within the affected area. There is concern that the commercial development of the proposed parcel at the end of Seward Avenue would obstruct the essential use of the adjacent properties for public health.

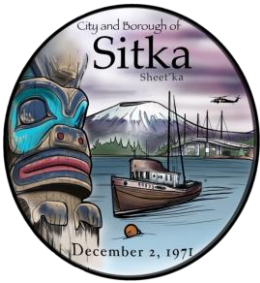
To date, SEARHC has not been officially approached for comment as an adjacent property owner. We continue to request that this project undergo a thorough impact study and provide mitigation to resolve the effects or select a different development site. By separate letter, we will also request a formal and ongoing Tribal consultation with the FAA on this project.

Sincerely,



**Charles Clement**  
President and Chief Executive Officer

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# City and Borough of Sitka

PROVIDING FOR TODAY...PREPARING FOR TOMORROW

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*Coast Guard City, USA*

March 2, 2021

**VIA MAIL & EMAIL**  
**cclement@searhc.org**

Mr. Charles Clement  
President and Chief Executive Officer  
Southeast Alaska Regional Health Consortium  
3100 Channel Drive, Suite 300  
Juneau, AK 99801

Re: Comments on Sitka Seaplane Base Draft Environmental Assessment

Dear Mr. Clement,

Thank you for your comment on the City and Borough of Sitka's (CBS's) Draft Environmental Assessment (EA) on the Sitka Seaplane Base. While we recognize your concerns about development in the vicinity of your facilities on Japonski Island, and we agree with the importance of the services you provide to the region, we disagree that the proposed project will have detrimental and unmitigable impacts on the health care services provided by Southeast Alaska Regional Health Consortium (SEARHC). We believe that improving our seaplane facilities in fact supports direct access to small communities throughout the region. We would like to clarify some of the issues raised and offer to work with you to address your concerns on this much needed project.

The President's Memorandum on Tribal Consultation and Strengthening Nation to Nation Relationships was published January 26, 2021, the day after the Draft EA was published for review and comment and more than a year after Tribal consultations were initiated. In compliance with U.S. Department of Transportation (DOT) Order 5301.1, Federal Aviation Administration (FAA) Order 5050.4B, and Executive Order 13175, the FAA and CBS initiated consultation with tribal entities at project kickoff in November 2019. Invitations for consultations were sent to the following tribal entities: Sitka Tribe of Alaska; Hoonah Indian Association; Hydaburg Indian Association; Organized Village of Kake; Central Council Tlingit and Haida Indian Tribes of Alaska, Yakutat Tlingit Tribe, and Sealaska. These tribal representatives were also mailed notices of the project scoping meetings in December 2019, the release of the Draft EA in late January 2021, and the public meeting on February 17, 2021. No responses from tribal entities were received, however members of the Sitka Tribe of Alaska attended the public meeting on the Draft EA. Based on the cultural and marine environment (subsistence) interest expressed at that meeting, CBS reached out to Sitka Tribal Resources Committee at their monthly meeting Thursday, February 25, 2021 to share information and seek tribal input.

SEARHC (Steve Merkel and Joan Skannes) was included in the Sitka Seaplane Base mailing list for notifications and invitations to scoping meetings in December 2019 and had remained on the notification list since then. Mr. Greg McIntyre attended the December 2019 public scoping meeting and was later designated by SEARHC as the point of contact for the project. Mr. McIntyre and Ms. Maegan Bosak attended the February 2021 public meeting on the Draft EA. In addition, CBS

Administration, 100 Lincoln Street, Sitka, Alaska 99835  
907-747-1812 [administrator@cityofsitka.org](mailto:administrator@cityofsitka.org)

added studies to the scope of the environmental review process specifically in response to comments received from SEARHC in a letter dated June 2, 2020.

Although FAA environmental review procedures do not require a noise analysis for seaplane bases with the low number of operations projected for this site, based on the concerns noted in SEARHC's June 2, 2020 letter to CBS, CBS conducted a seaplane noise study to determine if future noise levels would be incompatible with SEARHC facilities. As you might imagine, the FAA deals with aircraft noise issues across the country and has developed aircraft noise models to help assess the potential for noise impacts from airport (or seaplane base) operations. Over decades, the FAA and other federal agencies have evaluated noise metrics and repeatedly determined that the DNL metric is most appropriate for evaluating long-term community noise exposure and land use compatibility. This was confirmed most recently in a report to Congress in 2020. Based on numerous studies of aircraft noise and adverse noise effects, noise levels of up to 65 dBA DNL are considered to be compatible for all land uses, including medical facilities. As documented in the Draft EA, the noise analysis for the Sitka Seaplane Base showed average noise levels of 49-52 dBA DNL at the existing and proposed hospitals. These modeled DNL levels are for outside noise levels. Interior noise levels are typically 15 dBA lower than exterior levels but can be even lower depending on the construction methods used. Assuming that SEARHC would be using energy efficient design methods, interior noise levels in the range of 40 dBA DNL should be achievable. Since floatplane operations rarely occur at night, noise levels at night would be assumed to be lower. The noise analysis was calculated using estimated operations on the busiest day of the year, so it is a conservative estimate of overall noise levels in the area.

Despite the noise analysis finding that the long-term noise exposure would be within acceptable limits for land use compatibility, the Draft EA does recognize that more operations will result in more noise, and that noise impacts would continue to occur during individual takeoff events, depending on the aircraft type, takeoff location, time of day, and weather conditions. Although the noise analysis in the Draft EA focused more on Mount Edgecumbe High School, as it is the closest noise sensitive use to seaplane operations on Sitka Channel, the same analysis applies to SEARHC facilities. CBS and the aviation stakeholders would be happy to meet with SEARHC to discuss additional "fly friendly" measures that could be incorporated into seaplane operations from the new seaplane base.

The proposed seaplane base is on a public street and is not expected to result in a high level of traffic on a daily basis. However, given SEARHC's concerns about road traffic in the June 2, 2020 letter, CBS attempted to estimate the traffic that might be generated by the new seaplane base. CBS surveyed pilots that had submitted letters of interest in using the facility to determine the type of operations they anticipated conducting (private vs. commercial), the number and type of aircraft they planned to base at the site, and the number of trips they anticipated making on a daily or weekly basis. The analysis of traffic and traffic noise also is conservative and likely over-estimates effects. Many private seaplane operators operate their seaplanes less than once a week during limited months of the year. However, we assumed traffic based on each private aircraft being used once a week all year to estimate the total traffic generated (12 to 13 one-way trips per day on peak days). This conservative number of vehicle trips per day would not be expected to affect emergency access to the hospital or to add meaningfully to noise levels on Seward Avenue given current levels of use.

The presence of the SEARHC facilities is noted several times in the Draft EA, but most discussion of the SEARHC facilities is in the land use and noise sections of the Draft EA. These sections address the concerns raised by SEARHC regarding the potential for traffic impacts and noise impacts on SEARHC facilities and acknowledge that the proposed project would increase traffic


and noise in the area. Although noise and traffic would increase, there is no evidence that these increases would have significant adverse effects on SEARHC operations.

Finally, we are not aware of anything in the Draft EA that shows the proposed new hospital on the other side of the island; the only figure where we identify the new hospital location is on the noise study in Appendix E (figure attached). We agree that the location of the hospital on that figure, while in the vicinity, should be moved a bit closer to the channel. Please let us know if there is another figure somewhere in the Draft EA that does not have the correct location. SEARHC's behavior health clinics are noted in the summary of effects in Table 3-1 and in Sections 5.5.1, 5.5.2, and 5.9.1.2.

CBS is happy to meet with you to discuss these concerns and provide additional information on the traffic and noise analysis conducted for the Draft EA and, based on this discussion to add additional detail to the Final EA to more fully address traffic, noise, and land use compatibility impacts and potential mitigation measures.

Thank you for providing your comments and we look forward to meeting soon.

Sincerely,



**John M. Leach**  
Municipal Administrator

Enclosure/Attachment

cc: Via Email Only:  
Lisa Gassman, General Manager Sitka Tribe of Alaska,  
lisa.gassman@sitkatriben-sn.gov

Figure 3: Receptor Locations

