

APPENDIX E:
SECTION 106 CONSULTATION
DOCUMENTATION AND
MEMORANDUM OF AGREEMENT



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION
Office of History & Archaeology

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907-269-8700
<http://dnr.alaska.gov/parks/oha>

July 1, 2025

File No: 3130-1R FAA / 2019-01376

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Kendall.D.Campbell@faa.gov

Subject: New Sitka Seaplane Base

Dear Ms. Campbell:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence on May 23, 2025 (dated May 14, 2025). Following our review of your letter and the report titled *Cultural Resource Report: New Sitka Seaplane Base*, our office concurs with the following determinations of eligibility (Table 1) for listing in the National Register of Historic Places (NRHP).

Table 1. Determinations of Eligibility

No.	AHRS#	Street Address/Site Name	FAA Determination	AK SHPO Comment
1	SIT-01115	Japonski Island Observation Post and Gun Emplacement	Remains Eligible	Concur
2	SIT-01124	Rockery Wall, Trench Features, and Depressions	Not Eligible	Concur
3	SIT-01172	Historic Sitka Seaplane Base	Not Eligible	Concur

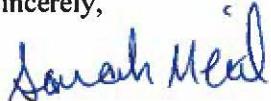
Our office appreciates the analysis to assess the association of the various features – natural and cultural – identified within the area of potential effects. We have no objections to the proposed revision to SIT-01115, which includes updating the historic property's name, Japonski Island Observation Post and Gun Emplacement.

Additionally, we reviewed the subject undertaking pursuant to Section 106 of the National Historic Preservation Act. Following our review, we concur that a finding of historic properties adversely affected remains appropriate for the proposed undertaking. We also agree that destruction of SIT-01115 would constitute a physical use of a Section 4(f) property.

July 1, 2025
Page 2 of 2

Thank you for the opportunity to comment. We look forward to continuing consultation to resolve adverse effects through the Memorandum of Agreement development process. Please contact me at sarah.meitl@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,



Sarah Meitl
Deputy State Historic Preservation Officer

SJM

**MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL AVIATION
ADMINISTRATION,
THE ALASKA STATE HISTORIC PRESERVATION
OFFICER,
AND
THE CITY AND BOROUGH OF SITKA
PURSUANT TO 36 CFR PART 800
REGARDING FEDERAL FUNDING FOR THE SITKA
SEAPLANE BASE ON JAPONSKI ISLAND**

Airport Improvement Project Grant #: 3-02-0488-001-2019

PREAMBLE

14 **WHEREAS**, the Federal Aviation Administration (FAA) Alaskan Region Airports Division, has
15 received an application for federal assistance from the City and Borough of Sitka (CBS) to construct
16 a new seaplane base and support facilities (Project) (Attachment A: *Project Maps*, Figure 1); and

17 **WHEREAS**, the FAA has determined that the allocation of Federal funds for the Project constitutes
18 an undertaking and that the proposed undertaking has the potential to cause effects to historic
19 properties subject to review under Section 106 of the National Historic Preservation Act (NHPA), as
20 defined in 36 CFR § 800.16; and

21 **WHEREAS**, the FAA has consulted with the Alaska State Historic Preservation Officer (SHPO)
22 pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the NHPA (54 U.S.C. §
23 306108); and

24 **WHEREAS**, the FAA, in consultation with the SHPO, initially defined the area of potential effects
25 (APE) for the Project as including Project areas subject to ground disturbance,¹ vibration, visual
26 effects, increased traffic, and offshore areas within 250 feet of Project components (Attachment A:
27 *Project Maps*, Figure 2) and expanded the APE in 2024 to include the old Seaplane Base and the 65
28 dB DNL noise contour (Attachment A: *Project Maps*, Figure 3 and Figure 4); and

29 **WHEREAS**, the FAA has consulted with the National Park Service (NPS), which administers the
30 National Historic Landmark (NHL) program for the Secretary of the Interior (SOI), and participates
31 in the consultation process when an undertaking may potentially have an adverse effect on an NHL;
32 and

33 **WHEREAS**, the FAA sponsored a cultural resources survey of the APE in 2021 which documented
34 the Japonski Island Observation Post and Gun Emplacement (SIT-01115), and FAA has determined,
35 and SHPO concurred, that SIT-01115 is eligible for listing in the National Register of Historic Places

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Sitka Seaplane Base Memorandum of Agreement

FINAL

Version 4 – December 2025

36 (NRHP); and

37 **WHEREAS**, in 2022 archaeological monitoring of geotechnical investigations resulted in the
38 identification of four additional features in the APE recorded as SIT-01124; and

39 **WHEREAS**, additional concerns for the presence of human remains raised by the Sitka Tribe of
40 Alaska (STA) resulted in a second cultural resources survey of the Project APE in 2024, which
41 documented additional features assigned to SIT-01124, and in 2025 the FAA determined, and SHPO
42 concurred, that SIT-01124 is not eligible for listing in the NRHP; and

43 **WHEREAS**, the FAA determined, and SHPO concurred, that the existing Sitka Seaplane Base (SIT-
44 01172) is not eligible for listing in the NRHP; and

45 **WHEREAS**, a review of the Alaska Heritage Resources Survey (AHRS) indicates no historic properties
46 are within the 65 dB DNL noise contour; and

47 **WHEREAS**, the FAA determined that the undertaking will result in an adverse effect to SIT-01115
48 as a result of demolition of SIT-01115 due to it being in the direct path of the proposed seaplane haul-
49 out ramp; and

50 **WHEREAS**, the FAA has determined that the undertaking will result in adverse indirect visual
51 effects to the adjacent Sitka Naval Operating Base and U.S. Army Coastal Defenses NHL (SIT-
52 00079); and

53 **WHEREAS**, the FAA has consulted with the SHPO on the determination of effect, and SHPO
54 concurred on July 1, 2025; and

55 **WHEREAS**, the FAA consulted with the NPS on the indirect effects to the NHL, and NPS has agreed
56 to participate in the development of this agreement; and

57 **WHEREAS**, the United States Army Corps of Engineers (USACE) agrees with the FAA's finding
58 of effect for the Project and the terms of this MOA, and has been invited to sign the agreement as an
59 Invited Signatory; and

60 **WHEREAS**, the FAA invited the Central Council of Tlingit & Haida Indian Tribes of Alaska, the
61 Sitka Tribe of Alaska, the Yakutat Tlingit Tribe, the Hoonah Indian Association, the Organized
62 Village of Kake, and Sealaska Corporation to consult on the Project as part of the Section 106 process;
63 and

64 **WHEREAS**, The STA was the only Alaska Native Tribe or organization to respond and request
65 consultation.

66 **WHEREAS**, the FAA has consulted with the STA in accordance with consultation requirements as
67 set forth in 36 CFR § 800.2(c)(2) as it relates to sites of traditional religious and cultural importance
68 within the Project APE, and have invited STA to sign this agreement as a Concurring Party; and

69 **WHEREAS**, the FAA acknowledges that the STA and their Tribal citizens have direct historic and
70 ethnographic affiliation with the lands comprising the proposed seaplane base property; and

71 **WHEREAS**, consultation with the STA indicated that there remains the potential for the inadvertent
72 discovery of artifacts or burials/human remains on the upland portion of the Project APE resulting in
73 implementation of an archaeological monitoring and inadvertent discovery plan during geotechnical
74 investigations in 2022; and

75 **WHEREAS**, this Memorandum of Agreement (MOA) includes a process to address post-Section
76 106 review discoveries and establishes a process to mitigate direct adverse effects to SIT-01115 and
77 minimize visual effects to SIT-00079 during construction activities, pursuant to 36 CFR §
78 800.13(a)(2); and

79 **WHEREAS**, the CBS, as an applicant for federal assistance, has participated in consultation pursuant
80 to 36 CFR Part 800 and shall be responsible for administering and implementing the stipulations of
81 this agreement for, in coordination with, and under the direction of the FAA, and FAA has invited
82 the CBS to sign this agreement as an Invited Signatory; and

83 **WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), the FAA notified the Advisory Council on
84 Historic Preservation (AHP) of its adverse effect determination with the specified documentation,
85 and on May 4, 2021 the AHP declined to participate in the consultation.

86 **NOW, THEREFORE**, the FAA, SHPO, and CBS (collectively "Signatories") hereby agree, and
87 STA and NPS concur, that the undertaking shall be implemented in accordance with the following
88 stipulations.

89 STIPULATIONS

90 In accordance with the scope and objectives of this agreement, the FAA, in coordination with
91 CBS, shall ensure that the following stipulations are implemented:

92 I. Scope and Objectives

- 93 • The primary purpose of this agreement is to ensure the FAA's continued compliance with
94 the implementing regulations of Section 106 of the NHPA (36 CFR Part 800) throughout
95 the duration of ground disturbing and construction activities associated with development
96 of the Project.
- 97 • This agreement defines the FAA's avoidance and mitigation responsibilities for known
98 historic properties that may be adversely affected by the Project.
- 99 • This agreement establishes protocols in advance of construction for the treatment of
100 inadvertent discoveries that may occur during construction, to ensure that clear procedures,
101 roles, responsibilities, and authorities regarding those discoveries have been delineated.

102 II. Professional Qualifications Standards

- 103 • Unless otherwise specified, all actions prescribed by this MOA that involve the identification,
104 evaluation, analysis, recording, treatment, monitoring, or disposition for historic properties,
105 or that involve reporting or documentation of such actions in the form of reports, forms, or

106 other records, shall be carried out by or under the direct supervision of a person or persons
107 who meet at a minimum the SOI Professional Qualifications Standards (48 Fed. Reg. 44738-
108 44739 (April 24, 1998); Appendix A to 36 CFR Part 61) in the appropriate discipline. The
109 FAA and CBS shall ensure that consultants retained for services pursuant to this agreement
110 meet these standards.

111 • The FAA and CBS shall ensure that all methods employed and reports resulting from
112 implementation of this MOA meet contemporary standards of practice, including the SOI
113 *Guidelines for Archaeological Documentation* (48 Fed. Reg. 44734-44737 (September 29,
114 1983)), SOI *Standards and Guidelines for Archaeology and Historic Preservation* (NPS
115 1983), and OHA *Preservation Series No. 3, Cultural Resource Investigation Reports: Outline*
116 (OHA 2023), No. 8, *Review and Compliance Program Guidelines for Section 106*
117 *Consultation with the State Historic Preservation Office* (OHA 2018), and No. 16,
118 *Inadvertent Discovery and Unanticipated Effects* (OHA 2022).

119 **III. Measures to Avoid Adverse Visual Effects to the Sitka Naval Operating Base and** 120 **U.S. Army Coastal Defenses NHL**

121 • To avoid visual effects to SIT-00079, CBS has modified the Project design to lower the
122 elevation of the site and will develop an interpretive panel to be placed at the boundary
123 between the NHL and the new Seaplane Base.

124 ○ Prior to the award of Federal funds, CBS will coordinate with the FAA to develop a
125 scope of services and execution plan. SHPO and STA will be invited to review the
126 plan.

127 ○ The panel will be developed to industry standards (22 inches by 34 inches and
128 comprised of half-inch thick high-pressure laminate) by or under the supervision of a
129 Secretary of the Interior-qualified historian.

130 ○ The panel will include a discussion focusing on WWII history at the Naval Operating
131 Base and the role of U.S. Army Coastal Defense Network structures at the project
132 location, specifically the need for an observation post near the Officer's Quarters.

133 ○ Panel content will be developed with signatory and concurring party input, with
134 allowance of review and comment at the 95% design.

135 ○ The panel will be placed on CBS property demarcating the transition from the historic
136 Naval Operating Base to the new Sitka Seaplane Base.

137 **IV. Mitigation Measures for the Resolution of Adverse Effects on the Japonski Island** 138 **Observation Post and Gun Emplacement (SIT-01115)**

139 • To resolve adverse effects to SIT-01115, CBS, or a contractor on its behalf, will record the
140 physical characteristics and measurements of SIT-01115 in a standard NPS documentation
141 style; specifically, a Modified Level IV Historic American Building Survey (HABS)
142 documentation including the production of a short-form history of the property and accurate

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scaled drawings of the structure and its environs.

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- CBS, or a contractor on its behalf, will coordinate with the NPS and the HABS Regional Coordinator to ensure a permanent record of the structure and its characteristics are preserved in perpetuity.

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- The documentation generated through the HABS process may be incorporated into other preservation media (e.g., signage, pamphlets, online exhibits), disseminated to interested parties and institutions.

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- Concurrent with the HABS documentation of SIT-01115 above, the spatial inter-relationships of feature components of SIT-0115 will be recorded and mapped using survey-grade GPS equipment. Documentation may include the use of three-dimensional scanning equipment, as applicable.

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- CBS, or consultants hired on its behalf, will assemble the HABS documentation and mapping of the Observation Post and Gun Emplacement into a technical report and provide to FAA for review. Following FAA review, CBS will provide copies of the report and data to the Alaska Office of History and Archaeology (OHA), the NPS, and other interested consulting parties for comment no later than one year after the field data has been collected.

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- To resolve adverse effects to SIT-01115, CBS, or a contractor on its behalf, will incorporate design features of the Observation Post into the covered seaplane passenger waiting area.

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- The HABS documentation, including photographs, descriptions, or three-dimensional scanning, will be used in replicating design features at the passenger waiting area.

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- Design of the passenger waiting area shall include recreation of the observation slit in the appropriate orientation to mimic the view from SIT-01115, display of a reduced scale recreation of SIT-01115, and an interpretive panel discussing the Observation Post and its role in the U.S. Coastal Defenses during WWII.

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- The size and location will be informed by the final site design. The materials used will be appropriate to the size and location. Size, location, and materials will be approved by FAA, as the funder, and CBS, as the party responsible for maintenance, during final site design. Consulting parties will be offered the opportunity to review the size, location, and materials at or before 95% design.

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- Interpretive displays and content will be developed with signatory and concurring party input, with allowance of review and comment at the 95% design.

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- To resolve adverse effects to SIT-01115, CBS, or a contractor on its behalf, will document and rehabilitate a similar type historic-age structure near the Water Wastewater Treatment Plant on Galena Avenue on Japonski Island.

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- The structure will be surveyed and recorded by a qualified professional and a

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179 determination of eligibility (DOE) prepared. Documentation will include preparation
180 of an AHRS card. FAA will review documentation prior to submission to OHA to
181 request concurrence on the DOE.

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- 183 ○ HABS documentation will occur concurrently with the documentation of SIT-01115
and will follow the same standards and reporting requirements.
- 184 ○ CBS, or a contractor on its behalf, will develop a maintenance and preservation plan
185 for the structure at Galena Avenue which will include initial cleaning, minor repairs,
186 minimal vegetative clearing around the structure, and initial trail maintenance. The
187 plan will be reviewed by signatory and concurring parties to this MOA prior to
188 finalization.
- 189 ○ CBS, or a contractor on its behalf, will develop a plaque to be placed at the structure.
190 The plaque may include information on the date of construction, historical
191 significance, architectural style, and will be similar to plaques located in the Fort
192 Rousseau Causeway State Historical Park.”

193 **V. Measures to Minimize Adverse Effects to Unknown Archaeological Materials and**
194 **Inadvertent Disturbance of Human Remains**

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- 196 • To address post-Section 106 discoveries and resolve any adverse effects to archaeological
197 materials or inadvertent disturbance of human remains which may be present within the
Project APE.
- 198 • The FAA and CBS shall ensure that an archaeological monitor who meets the SOI's
199 Professional Qualification Standards for Archaeology shall be present during terrestrial
200 ground disturbing activities.
- 201 • CBS will offer to hire a tribal monitor for archaeological monitoring activities, to be
202 designated by STA.
- 203 • The FAA, in coordination with CBS, has developed a *Cultural Resources Monitoring and*
204 *Inadvertent Discovery Plan* in consultation with SHPO, NPS, and STA (Attachment B). The
205 Plan is consistent with the OHA Preservation Series No. 15 *Monitoring Guidelines* (OHA
206 2018) and OHA Preservation Series No. 16 *Inadvertent Discovery and Unanticipated Effects*
207 (OHA 2022).
- 208 • The purpose of the *Cultural Resources Monitoring and Inadvertent Discovery Plan* is to
209 describe the activities associated with archaeological monitoring, identify the roles and
210 responsibilities of Project participants, and to provide clear and concise guidance for Project
211 personnel that addresses the actions to be taken in the event that human remains or
212 archaeological, historic, or cultural materials, are discovered during monitored ground
213 disturbing activities associated with the Project.
- 214 • CBS shall require that a preconstruction meeting employing a presentation provided by the
215 FAA is conducted among the CBS Project Manager, the Construction Contractor/Onsite

216 Supervisor, the Archaeological Monitor and the Tribal Monitor to discuss the terms and
217 conditions of the *Cultural Resources Monitoring and Inadvertent Discovery Plan*
218 (Attachment B).

219 • CBS, or consultants hired on its behalf, shall prepare a report, meeting contemporary
220 professional standards and the *SOI Standards and Guidelines for Archaeological*
221 *Documentation* (48 Fed. Reg. 44734-44737 (September 29, 1983)) following the completion
222 of monitoring activities by the Archaeological Monitor and provide a draft to the FAA for
223 review. Following the FAA review, CBS shall ensure that the final report is provided to all
224 consulting parties within one year after completion of all archaeological monitoring. SHPO
225 and consulting parties will have 30 days to review and provide comment on the monitoring
226 report.

227 **VI. Inadvertent Discoveries of Cultural Resources**

228 • If previously unidentified cultural resources (including artifacts, structures, or features)
229 are encountered, the FAA shall require CBS or its contractor to implement the Inadvertent
230 Discovery protocols contained in Appendix B of this MOA.

231 • In the event that the FAA determines the inadvertent discovery is eligible for the NRHP,
232 and SHPO concurs, the FAA shall develop actions to resolve any adverse effects,
233 consistent with the *SOI Standards and Guidelines for Archaeology and Historic*
234 *Preservation* (48 Fed. Reg. 44716 (September 29, 1983)), through consultation amongst
235 the FAA, CBS, SHPO, STA, and consulting parties. The FAA and CBS shall ensure that
236 the resolution measures are implemented.

237 **VII. Curation**

238 • Any materials collected as part of archaeological monitoring efforts shall be curated at the
239 CBS' (landowner) expense, in accordance with 36 CFR Part 79, at the University of Alaska
240 Museum of the North under an approved provisional curation agreement, or at another
241 repository within the State as determined by the FAA and CBS in consultation with consulting
242 parties.

243 • Conservation costs may include, but are not limited to, curation fees charged by approved
244 institutions, acquisition of archival materials, shipping, cleaning, rehousing, and any other
245 conservation action determined necessary by a qualified conservator or considered
246 common/ethical practice by cultural resources professionals.

247 • Should archaeological materials consist of artifacts of Alaska Native affiliation, CBS will
248 consult with STA as to the appropriate disposition of those materials. STA may request that
249 CBS relinquish ownership of the materials to STA, at which point CBS will provide
250 documentation of the transfer of materials to the Tribe.

251 **VIII. Unanticipated Effects**

252 • In the event that a previously known property will be affected or has been affected in an

unanticipated manner, all activity will cease within 50 feet of the property to avoid or minimize harm to the property.

- Should a consulting party observe unanticipated effects to historic properties, the consulting party will notify the FAA and CBS within 48 hours of observing the unanticipated effects. The FAA shall consult with SHPO and the consulting party to identify the effects.
- The FAA shall assess the unanticipated effects. Consistent with 36 CFR § 800.5(b) and (d)(1), the FAA may determine that there is no adverse effect on historic properties if the observed effects would not meet the Criteria of Adverse Effect at 36 CFR § 800.5(a)(1).
- If the unanticipated effects are determined to be adverse, the FAA shall consult with CBS and SHPO (and other consulting parties, as appropriate) pursuant to 36 CFR § 800.13 to determine if adverse effects can be avoided by alteration of construction methods or the installation of protective measures.
- If adverse effects cannot be avoided, the FAA shall develop actions to resolve the adverse effects, consistent with the *SOI Standards and Guidelines for Archaeology and Historic Preservation* (48 Fed. Reg. 44716 (September 29, 1983)), through consultation amongst the FAA, CBS, SHPO, and other consulting parties, as appropriate. The FAA and CBS shall ensure that the resolution measures are implemented.

IX. Treatment of Human Remains

- In the event that human remains are encountered during Project construction activities, the FAA and CBS shall ensure that they are at all times treated with dignity and respect, in a manner consistent with the ACHP's *Policy Statement on Burial Sites, Human Remains, and Funerary Objects* (<https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf>).
- Should human remains be encountered, work will be stopped at once in the vicinity of the discovery and a buffer zone created, to be determined at the discretion of the SOI-qualified Archaeological Monitor, to prevent further disturbance. The Archaeological Monitor (or Onsite Supervisor, if monitor is not present) shall immediately secure the area in accordance with Attachment B, *Cultural Resources Monitoring and Inadvertent Discovery Plan*, initiate notification to parties listed in Attachment C, *Human Remains Contacts*, and follow the procedures listed in Attachment D, *Sitka Seaplane Base Security and Media Plan*.
- To the greatest extent possible and provided there are no legal or jurisdictional issues to the contrary, the FAA and CBS shall work with STA to transfer control of any indigenous human remains to STA in an expedited and respectful manner.

X. Confidentiality

- Pursuant to 36 CFR § 800.11(c), the consulting parties to this MOA agree not to divulge

290 to the public, media, or other outside parties the specific location of the discovery, names
291 of the deceased or descendants (if determined), or specific details about the remains or
292 artifacts themselves, should human remains or artifacts of Alaska Native affiliation be
293 discovered. All consulting parties shall follow the authorized protocols for press releases,
294 media interviews, or other public communications outlined in Attachment D: *Sitka*
295 *Seaplane Base Security and Media Plan* to this agreement.

296 **XI. Submittals and Review Timelines**

- 297 • The FAA and CBS shall arrange a meeting to review this agreement one year from its
298 execution date and annually thereafter until all stipulations in the MOA are complete.
299 The FAA and CBS shall submit an annual letter status updates detailing progress of MOA
300 stipulation completion to all parties 30 days prior to the date of the annual review
301 meeting. Any amendments to this agreement recommended during the review shall be
302 considered in accordance with 36 CFR 800.6(c)(7). If the review results in a
303 recommendation to terminate the agreement, termination of the agreement shall be
304 considered in accordance with 36 CFR § 800.6(c)(8).
- 305 • The interpretive panel content for display at the NHL boundary (Section III) will be provided
306 to signatories and consulting parties at 95% design. Signatories and consulting parties will
307 have 30 days to review and provide comment.
- 308 • The HABS report for SIT-01115 (Section IV) will be reviewed by the FAA and provided to
309 signatories and consulting parties within one year of data collection. Signatories and
310 consulting parties will have 30 days to review and provide comment.
- 311 • The size, location, and design of the passenger waiting area (Section IV) will be provided to
312 consulting parties at or before 95% design. Consulting parties will have 30 days to review and
313 provide comment.
- 314 • The interpretive panel content for display at the passenger waiting area (Section IV) will be
315 reviewed by the FAA and provided to signatories and consulting parties at 95% design.
316 Signatories and consulting parties will have 30 days to review and provide comment.
- 317 • The survey report, DOE, and HABS report for the similar structure at Galena Avenue (Section
318 IV) will be reviewed by FAA and provided to OHA with a request for concurrence on the
319 DOE. OHA will have 30 days to review and provide comment.
- 320 • The maintenance and preservation plan for the similar structure at Galena Avenue (Section
321 IV) will be provided to signatories and consulting parties prior to finalization. The
322 maintenance and preservation plan will include the suggested plaque for placement at the
323 structure. Signatories and consulting parties will have 30 days to review and provide
324 comment.
- 325 • The Archaeological Monitoring Report (Section V) will be reviewed by the FAA and
326 provided to signatories and consulting parties within one year of completion of all
327 archaeological monitoring. Signatories and consulting parties will have 30 days to review and

328 provide comment.

329 • Unless otherwise stated, invited signatories and consulting parties will have 30 days to review
330 and provide comments on all reports and deliverables.

331 **XII. Dispute Resolution**

332 • Should any signatory object at any time to any actions proposed or the manner in which
333 the terms of this MOA are implemented, the FAA shall consult with such party to resolve
334 the objection. If the FAA determines that the Section 106-related objection cannot be
335 resolved through consultation, the FAA will

336 ○ Forward all documentation relevant to the dispute, including the FAA's proposed
337 resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the
338 resolution of the objection within 30 days of receiving adequate documentation.

339 Prior to reaching a final decision on the dispute, the FAA shall prepare a written
340 response that takes into account any timely advise or comments regarding the
341 dispute from the ACHP, signatories and concurring parties, and provide them with
342 a copy of the response. The FAA will then proceed according to its final decision.

343 ○ If the ACHP does not provide its advice regarding the dispute within the 30 day
344 time period, the FAA may make a final decision on the dispute and proceed
345 accordingly. Prior to reaching such a final decision, the FAA shall prepare a
346 written response that takes into account any timely comments regarding the
347 dispute from the signatories and concurring parties to the MOA, and provide them
348 and the ACHP with a copy of such written response.

349 ○ The FAA's responsibility to carry out all other actions subject to the terms of this
350 MOA that are not subject to the dispute remain unchanged.

351 **XIII. Amendments**

352 • Any Signatory to this agreement may request that the other Signatories consider an
353 amendment, whereupon they shall consult to consider such amendment pursuant to 36
354 CFR § 800.6(c)(7). Amendments shall be executed in the same manner as this agreement.

355 **XIV. Agreement by Other Federal Agency**

356 • In the event that another federal agency, not initially a party to this MOA, receives an
357 application for funding, license, or permit for the undertaking, as it is described in this
358 MOA, that agency may fulfill its Section 106 responsibilities by stating in writing that it
359 concurs with the terms of this MOA and by notifying the signatories that it intends to do
360 so. Such agreement shall be evidenced by execution of a signature page and filing it with
361 the ACHP, and implementation of the terms of this MOA.

362 **XV. Anti-Deficiency Act**

363 • The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits Federal agencies from incurring
364 an obligation of funds in advance of or in excess of available appropriations. Accordingly,
365 the Signatory Parties agree that any requirement for the obligation of funds arising from
366 the terms of this MOA will be subject to the availability of appropriated funds for that
367 purpose. The Stipulations contained in this MOA will not be interpreted as requiring the
368 obligation or expenditure of funds in violation of the Anti-Deficiency Act.

369 • If compliance with the Anti-Deficiency Act impairs the FAA's ability to implement the
370 Stipulations of this MOA, the FAA will consult with the Signatory Parties to determine
371 if an amendment is necessary to fully satisfy the stipulation herein.

372 **XVI. Duration**

373 • This agreement shall be implemented upon FAA grant award to fund the project
374 construction and continue in full force and effect for five years following execution. At
375 any time, CBS may request of the FAA and SHPO in writing to review CBS's project
376 schedule and consider an extension or modification of this agreement. No extension or
377 modification shall be effective unless all Signatories to the agreement have agreed to it in
378 writing (i.e., emails).

379 **XVII. Termination**

380 • Any Signatory to this agreement may terminate it by providing 30 days' notice to the
381 other Signatories. The Signatories will consult during the period prior to termination to
382 seek agreement on amendments or execute a new MOA that would avoid termination. In
383 the event of termination, the FAA will seek the comments of ACHP pursuant to 36 CFR
384 § 800.7.

385 **Execution and Implementation** of this agreement shall evidence, pursuant to 36 CFR § 800.6(c),
386 that the FAA has consulted with SHPO, NPS, CBS, and the STA on the Sitka Seaplane Base
387 Project, in accordance with Section 106 of the NHPA. It shall further evidence that the FAA has
388 afforded the ACHP an opportunity to comment on the Undertaking and its effects on historic
389 properties, and that the FAA has taken into account the effects of the Undertaking on historic
390 properties.

SIGNATURE PAGES – SIGNATORIES

By: **KATRINA C. MOSS** Digitally signed by KATRINA C. MOSS
Date: 2025.12.19 14:21:49 -09'00'

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SIGNATURE PAGES – SIGNATORIES

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418 SIGNATORY

419 ALASKA STATE HISTORIC PRESERVATION OFFICER

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By:

Sarah Meitl

Digitally signed by Sarah Meitl

Date: 2025.12.24 12:29:55 -09'00'

422 Sarah Meitl, Deputy State Historic Preservation Officer, Alaska State Historic Preservation Office

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DATE:

12/24/2025

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427 **SIGNATURE PAGES – INVITED SIGNATORIES**

428

429 **MEMORANDUM OF AGREEMENT**
430 **BETWEEN THE FEDERAL AVIATION ADMINISTRATION,**
431 **AND**
432 **THE ALASKA STATE HISTORIC PRESERVATION OFFICER**
433 **PURSUANT TO 36 CFR 800**
434 **REGARDING THE SITKA SEAPLANE BASE ON JAPONSKI ISLAND**

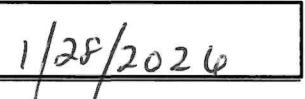
435

436 INVITED SIGNATORY

437 CITY AND BOROUGH OF SITKA

438
439 By: 

440 John M. Leach, Municipal Administrator

441
442 DATE: 

443

444

445

446 **SIGNATURE PAGES – CONCURRING PARTIES**

447

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454

455 INVITED SIGNATORY

456 U.S. ARMY CORPS OF ENGINEERS

457

458 By: 	2025.12.30 14:37:56 -09'00'
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459 Heather Markway, South Branch Chief, U.S. Army Corps of Engineers

460

461 DATE: 30 Dec 2025

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466 **SIGNATURE PAGES – CONCURRING PARTIES**

467

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474

475 CONCURRING PARTY

476 SITKA TRIBE OF ALASKA

477

478 By: _____

Rob Allen

479 Rob Allen, General Manager

480

481 DATE: 22 December 2025

482

483

484

Sitka Seaplane Base Memorandum of Agreement Attachment A: Project Maps

FINAL

Version 5 – December 2025

ATTACHMENT A:
PROJECT MAPS



Area of Potential Effect
 Upland Project Components



0 75 150 Feet

Area of Potential Effect

Sitka Seaplane Base

Figure 2

July 2025



 Area of Potential Effect	Existing Seaplane Base Area of Potential Effect	
Sitka Seaplane Base		
Figure 3		July 2025



 Area of Potential Effect
65-Decibel Noise Boundary



0 325 650 Feet

Area of Potential Effect
65 Decibel Noise Boundary

Sitka Seaplane Base

Figure 4

July 2025

ATTACHMENT B:
SITKA SEAPLANE BASE
CULTURAL RESOURCE MONITORING PLAN

Cultural Resources Monitoring and Inadvertent Discovery Plan

Sitka Seaplane Base

FAA Project Grant No.: 3-02-0488-001-2019

I. Purpose and Scope

This Monitoring and Inadvertent Discovery Plan (Plan) is particular to site preparation and construction activities for the Sitka Seaplane Base Project (Project). This plan has been developed to ensure that any potential archaeological resources or human remains discovered during ground-disturbing activities² for the Project are handled appropriately in accordance with federal and state statutes.

The Plan addresses post-Section 106 discoveries pursuant to 36 CFR 800.13(a)(2) and provides clear procedures and chains of authority that will be implemented in the event that archaeological materials are encountered, as outlined in 36 CFR 800.13(b)(3).³ The plan also provides guidance consistent with Alaska Statute (AS) 12.65.5, AS 18.50.250, and AS 11.46.482(a)(3) which apply to human remains found anywhere in the State of Alaska. These laws require notification of the Alaska State Troopers and the State Medical Examiner; require permits for disinterment, transport, and reinterment of human remains; and make intentional or unauthorized disturbance or removal of human remains a felony.

Archaeological monitoring will commence when ground disturbing activities that could disturb previously undocumented archaeological resources, or human remains, begins. Archaeologists will observe soil excavation, which may include vegetation removal, in areas where native soil may be encountered. The Archaeological Monitor may also be required to observe or delineate access routes used by heavy equipment operators, observe proposed staging areas for equipment or materials, and monitor removal of heavy equipment. Monitoring will not be required in submerged Project areas, or demolition of exposed bedrock.

Archaeological monitoring will conclude when all ground-disturbing construction activities in the upland and tideland areas associated with the Project are complete. CBS will offer to hire a Tribal monitor who may participate in monitoring site preparations on upland and tideland areas, at STA's discretion.

² Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

³ The FAA received concurrence from the Alaska State Historic Preservation Officer (SHPO) on a finding of Adverse Effects for the Project on March 24, 2021. During consultation, Sitka Tribe of Alaska (STA) requested that monitoring of construction activities be carried out in the Project area. Mitigation for adverse effects and a plan for addressing the discovery of human remains during construction are being discussed in the Memorandum of Agreement to which this Plan is appended.

II. Standards

The archaeological monitoring procedures contained herein are consistent with the Alaska Office of History and Archaeology (OHA) Historic Preservation Series Number 15, *Monitoring Guidelines* (OHA 2018).⁴ They are also designed to accommodate construction techniques, schedules, and logistics to the extent possible while still ensuring adequate consideration of archaeological resources that may be encountered during construction activities. Archaeological monitoring shall be conducted by a professional who meets the Secretary of the Interior's (SOI) *Professional Qualification Standards for Archaeology*⁵ (48 FR 44738-44739). In addition to meeting the SOI Standards, archaeological monitors must have experience working in Alaska and in identification, recovery, and recordation of perishable and non-perishable cultural resources, both prehistoric and historic.

III. Consulting Parties' Roles and Responsibilities

Federal Aviation Administration (FAA):

The FAA's issuance of Federal funds is an undertaking, as defined in 36 CFR Part 800. As the lead Federal agency, the FAA has consulted with SHPO to establish the area of potential effects (APE), identified and consulted with parties included in the Section 106 process, and issued findings of effect for the Project. Findings of adverse effect for the Project, and mitigation thereof, are included in a Memorandum of Agreement (MOA). Monitoring activities stipulated in the MOA are the result of government-to-government consultations with Sitka Tribe of Alaska (STA). The FAA remains responsible for the content and assessments of effect produced as a result of discovery of cultural resources or historic properties during archaeological monitoring.

State Historic Preservation Officer (SHPO):

The SHPO has assisted and consulted with the FAA in determining the APE for the Project, reviewed and commented on determinations of eligibility, assessments of effect, and proposed mitigation strategies. The SHPO is responsible for continued consultation under NHPA and review and comment on any proposed treatment regarding discovery of cultural resources or historic properties during archaeological monitoring.

City and Borough of Sitka (CBS):

As the applicant for the FAA funds, landowner, and Project proponent, CBS is responsible for providing Project-specific information to consulting parties, including but not limited to schedules, routes, design information, and any other information necessary to implement this Plan. CBS is responsible for the curation/disposition of any materials collected as part of archaeological monitoring efforts at an approved repository within the State as determined by the FAA and CBS in consultation with consulting parties. CBS is responsible for engaging an archaeological monitor and will hire a

⁴ OHA (2018). Historic Preservation Series No. 15: Monitoring Guidelines. Available from: <http://dnr.alaska.gov/parks/oha/hpseries/hp15.pdf>.

⁵ SOI's Standards available at: http://www.nps.gov/history/local-law/arch_stnds_9.htm.

Onsite Supervisor:

The Onsite Supervisor shall be designated by CBS and coordinate with the FAA in event of any discovery. This individual should be intimately familiar with the Project, have access to schedules, contact information, Project designs, and be the point of contact for the archaeological monitor and consulting parties. The Onsite Supervisor shall work in close concert with the Archaeological Monitor to ensure that all ground disturbing activities are monitored in accordance with the MOA and this Plan. Should discoveries be made during Project activities for which an archaeological monitor is not required, the Onsite Supervisor is responsible for implementing this Plan.

Archaeological Monitor:

All construction monitoring will be conducted in compliance with OHA monitoring guidance (OHA 2018) and SOI Standards for Archaeology. In coordination with the FAA, the Archaeological Monitor will conduct a cultural resources briefing for contractors and subcontractors prior to the start of any ground disturbing activities. The Archaeological monitor will be authorized to stop work if potentially significant archaeological or historic resources, or human remains are encountered. If any of these resources are encountered, the Archaeological Monitor will implement the protocols outlined below. The Archaeological monitor will also be responsible for recording, documenting, managing, and analyzing any artifacts or features which are recovered during the Project.

Sitka Tribe of Alaska (STA):

This Plan has been developed in consideration of concerns expressed by the STA during G2G and Section 106 consultation on this project. STA will be invited to review and comment on this Plan, and to coordinate with CBS to designate an appropriate Tribal Monitor in accordance with the stipulations of the MOA and this Plan.

IV. Tribal Involvement and Monitors

- A. CBS Project Manager or their contractor will contact STA to alert the Tribe about monitoring Project activities and timeline, and to invite the Tribe to designate a tribal monitor during monitoring activities. The tribal monitor will provide direct input during monitored Project activities, which may have the potential to identify or affect tribal cultural resources. The tribal monitor will participate in field activities so that they may make recommendations to the archaeologist onsite.
- B. The FAA will request that STA identify an individual to ensure clear and efficient communication about the monitoring requirements and schedule.
- C. STA may choose the individual to be hired as the tribal monitor, the CBS Project Manager or monitoring archaeologist will coordinate with the tribe and the tribal monitor regarding the particulars of the monitoring activities (dates, times, etc.).

- D. The tribal monitor will be reimbursed for their time through a direct contract with CBS or as a direct hire by CBS's contractor as a temporary/on-call employee.
- E. The tribal monitor will be required to participate in any necessary safety awareness trainings and cultural resources briefings prior to engaging in any monitoring activities.
- F. The designated tribal monitor has special expertise valued by the tribe. As such, the tribal monitor does not need to meet the SOI standards described above for Archaeological Monitors; however, tribal monitors must work under the direct supervision of the Archaeological Monitor.

V. Pre-Field Procedures

Permitting and Permissions

Prior to any ground disturbing activities, CBS and/or their consultants will secure the necessary cultural resource investigation and access permits required for cultural resource monitoring of site preparation activities for the Project. CBS will also procure a provisional curation agreement with the University of Alaska Museum of the North (UAM), or another repository within the State as determined by the FAA and CBS in consultation with consulting parties.

Pre-Construction Briefing and Site Assessment

The FAA has offered to provide Inadvertent Discovery training materials to CBS or its contractor, for presentation to the construction crew prior to mobilization. The Archaeological Monitor will provide a preconstruction cultural resources orientation to equipment operators prior to the commencement of site preparation activities. The preconstruction meeting will include how and where archaeological monitor(s) will observe ground-disturbing activities and hand-signal or other methods of communication between the archaeological monitor and the equipment operator.

All approaches to construction equipment and excavations will be conducted only under safe conditions, as required by the Occupational Safety and Health Administration (OSHA). The Archaeological Monitor and the Tribal Monitor will participate in any safety briefings and will review any project-specific health and safety plans prior to fieldwork.

Communications

Communications during the Project will include but are not limited to face-to-face meetings regarding construction and monitoring; routine communication with the CBS Project Manager or designated Onsite Supervisor regarding Project schedules and construction drawings and maps;

VI. Daily Monitoring Responsibilities

Prior to commencement of ground disturbing activities each day, the Archaeological Monitor will confer with the Onsite Supervisor regarding planned activities scheduled for the day. The Archaeological Monitor will be on site to observe vegetation removal, grubbing, and other ground disturbing activities and will maintain a daily monitoring log.

The daily monitoring log will include ground disturbing activity identifier(s) and results of monitoring. Site preparation or ground disturbance directly into exposed bedrock that do not need to be monitored will also be documented by the Archaeological Monitor in the daily monitoring log and final report. The Archaeological Monitor is responsible for submitting scanned copies of daily monitoring logs to the FAA, CBS, STA, and NPS at the conclusion of archaeological monitoring activities. Daily monitoring logs will be included as an appendix to the final monitoring report (see Reporting, below).

Identification

During monitored activities, all undisturbed surface soils and deposits and sediments below the present ground cover are subject to review by the Archaeological Monitor. Should the Archaeological Monitor determine examination of soil profiles is necessary, the Archaeological Monitor will:

- A. Notify the equipment operator or other construction personnel in the trenching area to halt all heavy equipment operation.
- B. When safe, the Archaeological Monitor may enter excavation areas to clean and examine trench walls, obtain matrix samples, or record stratigraphy.
- C. Once complete the Archaeological Monitor will clear the excavation area and give the equipment operator a notice that they can proceed. The Archaeological Monitor(s) will abide by OSHA regulations at all times.

VII. Archaeological Discoveries

In the event that the Archaeological Monitor identifies archaeological materials, the Archaeological Monitor will issue a Stop Work Order to confirm and assess the nature of the discovery. The following protocol will be followed to report cultural materials encountered during monitoring activities:

- A. The Archaeological Monitor will examine the materials encountered to determine whether the discovery represents an archaeological deposit, historic material, and/or potential historic property (with or without potential human remains)
- B. If the materials are archaeological in nature, the archaeological resources will be excavated and recorded by Archaeological Monitor, including at minimum:
 - a. Collection of GPS coordinates.
 - b. Obtaining an Alaska Heritage Resources Survey (AHRS) number
 - c. Preliminary evaluation for historic significance and integrity according to National Register of Historic Places eligibility criteria.

Notification

In the event of discovery of archaeological materials, the Archaeological Monitor will immediately alert the Onsite Supervisor and implement the notification and consultation procedures outlined below

within one (1) business day. Contact information for the following parties is included in Attachment C, *Notification Form and Contact Information for Agency and Tribal Officials Involved with Human Remains Consultation*.

- A. Should the discovery consist solely of artifacts that are clearly not of Alaska Native affiliation (e.g., World War II-era military artifacts), the FAA, SHPO, CBS, and NPS shall immediately be notified.
- B. Should the discovery consist solely of artifacts that appear to be of Alaska Native affiliation, STA, the FAA, SHPO, and CBS shall be notified.

Evaluation and Treatment

The Archaeological Monitor is responsible for evaluating cultural resources identified as a result of monitoring for historic significance and integrity according to National Register of Historic Places eligibility criteria. If the FAA determines the cultural resource is eligible for the NRHP, and SHPO concurs, the FAA and CBS shall develop an appropriate treatment plan consistent with the SOI Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716) through consultation between the FAA, CBS, SHPO, and consulting parties. The FAA and CBS shall ensure that the treatment plan is implemented.

Curation

CBS will assume the costs associated with curation of any materials⁶ collected in the process of monitoring. Conservation costs may include, but are not limited to, curation fees charged by approved institutions, acquisition of archival materials, shipping, cleaning, rehousing, and any other conservation action determined necessary by a qualified conservator or considered common/ethical practice by cultural resources professionals.

- A. During the permitting process, CBS will establish a provisional curation agreement with the UAMN or another approved repository within the State for collections, which CBS will finalize prior to submission of collections to the approved repository.
 - a. CBS, or cultural resources contractors hired on its behalf, will be responsible for submitting materials recovered during Project monitoring within one year following completion of the fieldwork that generated the collection. Collections will be curation-ready, as determined by repository.

⁶The term “materials” is consistent with the definition found at 36 CFR 79.4(a)(1), and refers to any objects, artifacts, specimens, records, or remains associated with historic properties. This includes all documentation generated during the implementation of this PA, with the exception of information that is subject to confidentiality clauses of NHPA, ARPA, and Alaska State law.

- B. Prior to disposition, CBS, or cultural resources contractors hired on its behalf, will safeguard materials from theft or damage by providing appropriate interim storage facilities and conservation actions, consistent with the requirements in 36 CFR 79.9.
 - a. As necessary, CBS may consult with repository staff regarding interim storage facilities and necessary conservation actions to be consistent with 36 CFR 79.9 (b)(4).
- C. Within 30 days following disposition, CBS will provide SHPO, NPS, and STA with accession records and documentation associated with the transfer and curation of materials.
- D. Should the archaeological materials consist of artifacts of Alaska Native affiliation, CBS will consult with STA as to the appropriate disposition of those materials. STA may request that CBS relinquish ownership of the materials to STA, at which point CBS will provide documentation of the transfer of materials to the Tribe.

VIII. Human Remains

Should human remains be encountered, work will be stopped at once in the vicinity and the Archaeological Monitor will secure the area to prevent further disturbance. Human remains will be treated with dignity and respect at all times, in a manner consistent with the ACHP's *Policy Statement on Burial Sites, Human Remains, and Funerary Objects* (<https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf>).

Notification of authorities and consultation shall be completed in accordance with NHPA regulations 36 CFR 800.13, state law⁷, and OHA guidance.⁸ To the greatest extent possible and provided there are no legal or jurisdictional issues to the contrary, the FAA and CBS shall work with STA to transfer control of any indigenous human remains to STA in an expedited and respectful manner. Construction shall not resume in the area until after notification of essential authorities and consultation regarding removal and disposition of the remains has been completed.

In the event that human remains, grave goods, or funerary objects are encountered at any time during ground disturbing activities, the Archaeological Monitor shall ensure that all work within 150 feet will immediately stop and the discovery will be given a minimum 75-foot buffer area to provide for the security, protection, and integrity of the remains.

- A. Remains will be immediately covered with a tarp or other materials (not soil or rocks) for temporary protection in place, as well as to shield them from being photographed, and the Archaeological Monitor will follow the procedures listed in Attachment D, *Sitka Seaplane Base Security and Media Plan*.
- B. Archaeological Monitor will initiate notification to parties listed in Attachment C,

⁷ Applicable state laws include: Human remains: AS 12.65.5, AS 11.46.482(a)(3), and AS18.50.250

⁸ OHA (2020). Guidelines: Laws and Protocols Pertaining to the Discovery of Human Remains in Alaska. Available from <http://dnr.alaska.gov/parks/oha/ahrs/humanremainshandout.pdf>.

Notification Form and Contact Information for Agency and Tribal Officials Involved with Human Remains Consultation. Individuals who will be notified immediately in the event of discoveries of potential human remains include:

- a. the appropriate authorities (Alaska State Troopers, the Sitka Police Department)
- b. relevant consulting parties (STA, FAA, and SHPO).
- c. The tribal monitor may notify STA immediately upon discovery.

C. If the remains appear recent, the FAA and CBS will defer to the Alaska State Troopers, the Sitka Police Department, and/or the State Medical Examiner for a determination of whether the remains are of a forensic nature and/or subject to criminal investigation.

D. Access to the area of the discovery shall be restricted to the CBS Project Manager, Archaeological Monitor, Tribal Monitor, Sitka Police Department (SPD), Alaska State Troopers (AST), State Medical Examiner (SME) or his/her representative, and appropriate agency representatives (i.e., FAA, CBS, and SHPO) until such time as a determination has been made that other parties have been notified and are allowed to access the location of the discovery.

E. Confidentiality will be a priority and responses to any discoveries of human remains and associated materials will comply with provisions of the *Sitka Seaplane Base Security and Media Plan* (Attachment D).

F. If the remains are determined not to be modern per 36CFR800.13(a)(2), the FAA will implement the process outlined in the MOA and the procedures in this plan to resolve any adverse effects.

Documentation and Analysis

The remains shall be documented through notes, sketches, and photographs sufficient to allow for independent assessment by the Signatories to the MOA and other parties deemed appropriate by said Signatories. If possible, the examination shall be undertaken onsite, prior to the removal of the remains from their burial location. However, the parties to this MOA recognize that onsite conditions or the conditions of the remains may be such that initial onsite examination is not feasible. If this is the case, the procedures for Removal (below) should be followed prior to examining and documenting the remains.

A physical anthropologist experienced in the analysis of human remains shall examine the human remains to perform a full inventory and attempt to provide osteological information such as age of death, an estimation of sex, stature, and ethnic affinity. The physical anthropologist shall:

- A. Document and analyze using standard osteological techniques. Additional osteological information may include whether the human remains have any pathological condition, indicators of stress, traumatic injuries or other unique features, as well as taphonomic condition. Where this is not possible, no exposed human remains will be left unattended

overnight. The physical anthropologist shall be afforded no more than thirty (30) days' time to conduct his or her analysis.

- B. Document the location of the discovery.
 - a. Locational information shall be available to the signatories to the MOA.
 - b. Locational information shall remain confidential and shall be deleted or blacked-out from any report of the discovery that will be contained in any repository outside of those affiliated with the signatories to the MOA.
- C. Photograph and/or produce line drawings of the discovery. Should the remains or associated or unassociated objects be determined to be of Alaska Native origin, no photograph of the remains shall be placed in the monitoring report or other document or be made available to the signatories unless written permission is obtained from STA and the descendants of the deceased, should they be identified (see Attachment D, *Sitka Seaplane Base Security and Media Plan*).
- D. Should analysis of the remains prove inconclusive as to cultural affiliation, the FAA will consult with the parties to the MOA to determine the appropriate final disposition of those remains.

Removal

If at all possible, remains should be left in place, secured, and examined per the above protocols while notification procedures and consultation is undertaken to determine the final disposition of the remains. If the remains cannot be left in place without incurring damage or adverse effect, the following protocols will be followed:

- A. Following notification, the Archaeological Monitor shall coordinate with the FAA, CBS, Alaska State Troopers, the Sitka Police Department, and/or the State Medical Examiner to place the remains in an appropriate container to be secured offsite.
- B. If the remains are other than fragmentary bones, a burial transit permit must be obtained from the local magistrate or Bureau of Vital Statistics prior to removal.
- C. If the remains are Alaska Native, STA will be invited and afforded reasonable opportunity to conduct any appropriate ceremony or rite before the remains are removed from their burial location.
 - a. the Signatories to the MOA will consult with the STA to expedite such ceremonies to the extent possible to allow construction activities to resume in a timely manner.
- D. Remains which are Alaska Native and determined not to be forensic in nature will be transferred to STA through coordination with the Tribe.

IX. Reporting

Sitka Seaplane Base Memorandum of Agreement Attachment B: Cultural Resource Monitoring Plan

FINAL

Version 5 – December 2025

At the completion of archaeological monitoring, the Archaeological Monitor shall write a report documenting his or her evaluation of the undertaking, including a catalog of discoveries made during the undertaking and the procedures followed. The report shall meet contemporary professional standards and the *SOI Standards and Guidelines for Archaeological Documentation* (48 FR 44734-44737). CBS, in coordination with the FAA, shall ensure that the final report is provided to all parties to the MOA within one (1) year after the completion of construction monitoring.

ATTACHMENT C:
Notification Form and Contact Information for
Agency and Tribal Officials Involved with Human
Remains Consultation

ATTACHMENT D:
SITKA SEAPLANE BASE
SECURITY AND MEDIA PLAN

Sitka Seaplane Base Security and Media Plan

FAA Project No. AIP-3-02-0488-001-2019

The purpose of this document is to provide direction to Project personnel regarding appropriate security and media interaction protocols in the event that human remains are discovered during construction at the Sitka Seaplane Base. Specific protocols for the treatment of the remains themselves are outlined in Attachment B, *Cultural Resource Monitoring Plan*, to the Memorandum of Agreement (MOA) for the Project.

Security

In the event that human remains are discovered, City and Borough of Sitka (CBS) shall ensure that the following security measures will be implemented:

- A. The location of the discovery shall be flagged off, surrounded by safety fencing, or otherwise identified and protected to ensure that no equipment or unauthorized personnel enter the area.
- E. The discovery shall be concealed with a temporary covering to avoid direct exposure to inclement weather or other damage. To the extent practicable, the temporary covering shall not make direct contact with the remains. If necessary, a muslin cloth may be placed directly on the remains.
- F. Access to the area of the discovery shall be restricted to the CBS Project Manager, Archaeological Monitor, Tribal Monitor, Sitka Police Department (SPD), Alaska State Troopers (AST), State Medical Examiner (SME) or his/her representative, and appropriate agency representatives (i.e., FAA, CBS, and SHPO) until such time as a determination has been made that other parties have been notified and are allowed to access the location of the discovery.
- G. Onsite project personnel should refrain from discussing the nature and location of the discovery with any outside party.
- H. Depending on the nature of the discovery, such as whether it contains grave goods or other artifacts, it may be necessary to post a security guard at the location to ensure such artifacts cannot be removed from the site.

Notification and Response to the Media

In the event that human remains are discovered, the following notification procedures and guidelines for responding to media requests will be implemented:

- A. Information about the discovery should be maintained as confidential at all times and is legally protected under section 304 of NHPA. However, should the media or other parties become aware of the discovery, care should be taken to preserve the privacy and dignity of the deceased.

- a. All communication with the media or other public will take place through the CBS Project Manager until such time as the remains are removed from their original location and transferred off-site. At that time, the FAA Environmental Program Manager shall become the primary point of contact for media inquiries.
- b. Information released to the media or other public should be restricted to the fact that a discovery of human remains occurred, but the exact location should not be disclosed. The presence of grave goods or other artifacts should not be discussed.
- c. Information or speculation about the ethnic affiliation of the deceased should be avoided until such time as it has been formally determined by a qualified physical anthropologist. At that time, information released to the media or other public should be restricted to a recognition that the deceased appears to be of Alaska Native, non-Native, or other identified ethnic affiliation, but no information as to familial, moiety, or clan relationships should be disclosed unless approved *in writing* by the STA (in the case of Alaska Native remains) and any identified descendants of the deceased.

- I. No photography or filming of the remains shall be allowed except by the Archaeological Monitor, physical anthropologist, or other agency cultural resource specialist for the purpose of scientifically documenting the remains prior to or after removal from their original location or by the SME, AST, or SPD for the purposes of criminal or other investigations.

Human Remains Photography Consent Form

Sitka Tribe of Alaska Contact Information: Dionne Brady-Howard, Chairwoman

On behalf of the Sitka Tribe of Alaska (STA), I hereby give permission to the archaeologist identified below to photograph the Alaska Native/prehistoric human remains uncovered during the construction of the Sitka Seaplane Base. In signing this form, the archaeologist agrees to the following conditions of the approval.

- A. The photographs (including any negatives) shall become property of the STA or the lineal descendants of the deceased if such can be identified. Photographs shall be curated with the STA unless otherwise specified or agreed to by the STA in consultation with the Federal Aviation Administration. The photographs shall not be reproduced or distributed without STA permission.
- B. All human remains shall be treated with utmost respect and in the spirit of the Native American Graves Protection and Repatriation Act (NAGPRA). All work shall proceed as defined in and in accordance with the Memorandum of Agreement (MOA) for the undertaking.
- C. Copies of the signed Human Remains Photography Consent Form must be provided to:
 - Kendall Campbell, Environmental Protection Specialist, FAA, 222 West 7th Ave. #14, Anchorage, AK 99513

Archaeologist requesting photography of human remains:

Print Name

Signature Date:

Sitka Tribe of Alaska Chairperson granting consent for photography of human remains:

Print Name

Signature Date:



U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box
14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

**New Sitka Seaplane Base
Federal Project # 3-02-0488-001-2019**

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mrs. Trish Neal
President
Alaska Association for Historic Preservation
PO Box 102205
Anchorage, AK 99501-2205
AKPreservation@gmail.com

Dear Mrs. Neal,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

- Seaplane Ramp Float (417 x 46 ft) to support 10 Cessna and 4 Beaver seaplane berths
- Transient/Loading Dock (175 x 56 ft)
- Drive-Down Float (128 x 68 ft)
- Transfer Bridge (120 x 12 ft)
- Approach Dock (80 x 24 ft) foot approach dock on pile foundation

Upland Base Parking Area and Approach (1.96 acres)

- Seaplane Haulout Ramp (230 x 30 ft)
- Utilities include electricity, water, and lighting
- Security fencing (934 linear ft)
- 14 Parking spaces
- Vegetative Buffer (0.12 acres)
- Access Driveway (200 x 23 ft)
- Covered Shelter
- Aircraft tie-downs located along the perimeter of the upland base parking area and approach
- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

Table 1: Section 106 Consultation Milestones

Event or Action	Date(s)
Undertaking Initiation	11/27/2019
Initial APE Field Inventory	5/20/2020
Presentation to Sitka Historical Preservation Commission	2/10/2021
SIT-01115 Eligibility Finding	3/3/2021
Adverse Effect Finding	3/3/2021
Presentation to Sitka Tribe of Alaska (STA)	3/19/2021
Consulting Party Meeting	4/16/2021
Advisory Council Notification	4/23/2021
MOA Consultation Meeting	8/16/2021
Geotech Finding of Effect	10/7/2021
Gov to Gov Consultation with STA	11/22/2021
Geotechnical Investigation and Archaeological Monitoring	3/4/2022 through 3/11/2022
FAA Consultation Update	10/6/2022
Gov to Gov Consultation with STA	3/6/2023
FAA Consultation Update	4/17/2024
Additional Field Inventory	5/23/2024 and 5/24/2024
FAA Consultation Update	2/7/2025

Area of Potential Effect

The APE (direct and indirect) for the proposed project consists of those areas subject to ground disturbance,¹ vibration, visual effects, and noise effects within the upland and offshore areas within 250 feet of the proposed new SPB location on Japonski Island (Figure 4). The direct and indirect APE has been expanded to include revisions to the noise analysis and 65 dB noise level contour, as well as the area of the existing seaplane base that will be decommissioned and deactivated (Figures 5 and 6).

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a

raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called “Victoria Dock” at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service

- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,




Digitally signed by KENDALL DIANNE

CAMPBELL

Date: 2025.05.15 16:47:29 -08'00'

Kendall D. Campbell
 Regional Tribal Consultation Official
 Cultural Resources Environmental Protection Specialist
 Federal Aviation Administration
 222 West 7th Avenue, MS #14
 Anchorage, Alaska 99513
 Phone: 907-271-5030
 Fax: 907-271-2851
Kendall.D.Campbell@faa.gov

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

- Kristi Ponozzo, FAA, Environmental Protection Specialist
- Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
- Jenny Liljedahl, Professional and Technical Services, Project Manager
- Aaron Christie, DOWL Senior Project Manager

References:

Arend, Chris. 2012. "Historic American Buildings Survey: Old Powerhouse, Mt Edgecumbe High School (MEHS) Sitka, Alaska." On file with Alaska Office of History and Archaeology.

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mr. Richard Peterson
President
Central Council Tlingit & Haida Inian Tribes of Alaska
320 West Willoughby Avenue, Suite 400
Juneau, AK 99501
otp@ccthita-nsn.gov

Dear Mr. Peterson,

In respect of your tribal sovereignty and in recognition of the Federal Aviation Administrations (FAA) trust responsibility to Federally Recognized Tribes, I am writing to update you on the FAA Alaskan Region Airports Division review of the City and Borough of Sitka's (CBS) application for federal assistance to be the sponsor of the proposed new Sitka Seaplane Base. The FAA last contacted you regarding this consultation in February 2025 and provided an update describing additional work conducted, including a revised noise analysis memorandum, expansion of the Area of Potential Effect (APE) to include the current Seaplane Base, and additional cultural resources field inventory in the proposed location of the new Seaplane Base, which was conducted by CBS' cultural resources consultant in the Spring of 2024.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the FAA is continuing consultation and requests your review on our amended finding of Adverse Effect to Historic Properties for proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Confidentiality

We understand that you may have concerns regarding the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. The FAA would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained under government-to-government consultation.

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

- Seaplane Ramp Float (417 x 46 ft) to support 10 Cessna and 4 Beaver seaplane berths
- Transient/Loading Dock (175 x 56 ft)
- Drive-Down Float (128 x 68 ft)
- Transfer Bridge (120 x 12 ft)
- Approach Dock (80 x 24 ft) foot approach dock on pile foundation

Upland Base Parking Area and Approach (1.96 acres)

- Seaplane Haulout Ramp (230 x 30 ft)
- Utilities include electricity, water, and lighting
- Security fencing (934 linear ft)
- 14 Parking spaces
- Vegetative Buffer (0.12 acres)
- Access Driveway (200 x 23 ft)
- Covered Shelter
- Aircraft tie-downs located along the perimeter of the upland base parking area and approach
- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

Table 1: Section 106 Consultation Milestones

Event or Action	Date(s)
Undertaking Initiation	11/27/2019
Initial APE Field Inventory	5/20/2020
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Area of Potential Effect

The APE (direct and indirect) for the proposed project consists of those areas subject to ground disturbance,¹ vibration, visual effects, and noise effects within the upland and offshore areas within 250 feet of the proposed new SPB location on Japonski Island (Figure 4). The direct and indirect APE has been expanded to include revisions to the noise analysis and 65 dB noise level contour, as well as the area of the existing seaplane base that will be decommissioned and deactivated (Figures 5 and 6).

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological

materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called "Victoria Dock" at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL's recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA's intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

If you wish to provide comments related to this proposed Project or engage FAA in government-to-government consultation, please contact Kendall Campbell, Alaska Region Airports Division, at the address above, at 907-271-5030, or by e-mail at Kendall.D.Campbell@faa.gov.

FAA requests your input on our proposal so that we can incorporate your concerns into Project development. Your timely response will greatly assist our compliance efforts and the preparation of any required environmental documentation. For that purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,



Digitally signed by KENDALL DIANNE
CAMPBELL
Date: 2025.05.14 14:24:57 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
Kendall.D.Campbell@faa.gov

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

- Kristi Ponozzo, FAA, Environmental Protection Specialist
- Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
- Jenny Liljedahl, Professional and Technical Services, Project Manager
- Aaron Christie, DOWL Senior Project Manager

References:

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mrs. Jennifer Pederson Weinberger
Cultural Resources Team Lead
National Park Service
2525 Gambell Street
Anchorage, AK 99503
jennifer_pederson@nps.gov
grant_crosby@nps.gov

Dear Mrs. Pederson Weinberger,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the

proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

- Seaplane Ramp Float (417 x 46 ft) to support 10 Cessna and 4 Beaver seaplane berths
- Transient/Loading Dock (175 x 56 ft)
- Drive-Down Float (128 x 68 ft)
- Transfer Bridge (120 x 12 ft)
- Approach Dock (80 x 24 ft) foot approach dock on pile foundation

Upland Base Parking Area and Approach (1.96 acres)

- Seaplane Haulout Ramp (230 x 30 ft)
- Utilities include electricity, water, and lighting
- Security fencing (934 linear ft)
- 14 Parking spaces
- Vegetative Buffer (0.12 acres)
- Access Driveway (200 x 23 ft)
- Covered Shelter
- Aircraft tie-downs located along the perimeter of the upland base parking area and approach
- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is

warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

Table 1: Section 106 Consultation Milestones

Event or Action	Date(s)
Undertaking Initiation	11/27/2019
Initial APE Field Inventory	5/20/2020
Presentation to Sitka Historical Preservation Commission	2/10/2021
SIT-01115 Eligibility Finding	3/3/2021
Adverse Effect Finding	3/3/2021
Presentation to Sitka Tribe of Alaska (STA)	3/19/2021
Consulting Party Meeting	4/16/2021
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FAA Consultation Update	4/17/2024
Additional Field Inventory	5/23/2024 and 5/24/2024
FAA Consultation Update	2/7/2025

Area of Potential Effect

The APE (direct and indirect) for the proposed project consists of those areas subject to ground disturbance,¹ vibration, visual effects, and noise effects within the upland and offshore areas within 250 feet of the proposed new SPB location on Japonski Island (Figure 4). The direct and indirect APE has been expanded to include revisions to the noise analysis and 65 dB noise level contour, as well as the area of the existing seaplane base that will be decommissioned and deactivated (Figures 5 and 6).

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called “Victoria Dock” at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the

property. The FAA acknowledges that SIT-01115 is outside the boundary of the Sitka Naval Operating Base and U.S. Army Coastal Defenses National Historic Landmark.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



Digitally signed by KENDALL
DIANNE CAMPBELL
Date: 2025.05.14 14:41:24 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
Kendall.D.Campbell@faa.gov

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

Kristi Ponozzo, FAA, Environmental Protection Specialist
Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
Jenny Liljedahl, Professional and Technical Services, Project Manager
Aaron Christie, DOWL Senior Project Manager

References:

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 15, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mrs. Anne Elise Pollnow
Archaeologist
Sea Level Consulting
403 Lincoln Street Suite 237
Sitka, Alaska 99835
anne@sealevelsitka.com
heritage@sealevelsitka.com

Dear Mrs. Pollnow,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

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- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

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Area of Potential Effect

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Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

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A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called “Victoria Dock” at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



 Digitally signed by KENDALL DIANNE
CAMPBELL
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Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
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Phone: 907-271-5030
Fax: 907-271-2851
[Kendall.D.Campbell@faa.gov](mailto:kendall.d.campbell@faa.gov)

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

Kristi Ponozzo, FAA, Environmental Protection Specialist
Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
Jenny Liljedahl, Professional and Technical Services, Project Manager
Aaron Christie, DOWL Senior Project Manager

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mr. Chandler Long
Lands Manager
Sealaska Corporation
One Sealaska Plaza, Suite 400
Juneau, Alaska 99801
chandler.long@sealaska.com

Dear Mr. Long,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

- Seaplane Ramp Float (417 x 46 ft) to support 10 Cessna and 4 Beaver seaplane berths
- Transient/Loading Dock (175 x 56 ft)
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- Approach Dock (80 x 24 ft) foot approach dock on pile foundation

Upland Base Parking Area and Approach (1.96 acres)

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- Utilities include electricity, water, and lighting
- Security fencing (934 linear ft)
- 14 Parking spaces
- Vegetative Buffer (0.12 acres)
- Access Driveway (200 x 23 ft)
- Covered Shelter
- Aircraft tie-downs located along the perimeter of the upland base parking area and approach
- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

Table 1: Section 106 Consultation Milestones

Event or Action	Date(s)
Undertaking Initiation	11/27/2019
Initial APE Field Inventory	5/20/2020
Presentation to Sitka Historical Preservation Commission	2/10/2021
SIT-01115 Eligibility Finding	3/3/2021
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Additional Field Inventory	5/23/2024 and 5/24/2024
FAA Consultation Update	2/7/2025

Area of Potential Effect

The APE (direct and indirect) for the proposed project consists of those areas subject to ground disturbance,¹ vibration, visual effects, and noise effects within the upland and offshore areas within 250 feet of the proposed new SPB location on Japonski Island (Figure 4). The direct and indirect APE has been expanded to include revisions to the noise analysis and 65 dB noise level contour, as well as the area of the existing seaplane base that will be decommissioned and deactivated (Figures 5 and 6).

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called “Victoria Dock” at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



 Digitally signed by KENDALL DIANNE
CAMPBELL
Date: 2025.05.14 15:02:22 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
[Kendall.D.Campbell@faa.gov](mailto:kendall.d.campbell@faa.gov)

Enclosures:

- Figure 1: Project vicinity
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- Figure 4: Area of Potential Effect (New Seaplane Base)
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Electronic cc w/ enclosures:

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Jenny Liljedahl, Professional and Technical Services, Project Manager
Aaron Christie, DOWL Senior Project Manager

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Dr. Rosita Worl
President
Sealaska Heritage Institute
105 S. Seward Street
Juneau, AK 99801
kelly.monteleone@sealaska.com

Dear Dr. Worl,

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Consultation

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- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



Digitally signed by KENDALL DIANNE

CAMPBELL

Date: 2025.05.14 15:42:02 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
[Kendall.D.Campbell@faa.gov](mailto:kendall.d.campbell@faa.gov)

Enclosures:

- Figure 1: Project vicinity
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- Figure 3: Current Proposed Action (Existing Seaplane Base)
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Electronic cc w/ enclosures:

Kristi Ponozzo, FAA, Environmental Protection Specialist
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Aaron Christie, DOWL Senior Project Manager

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565
oha.revcomp@alaska.gov

Dear Ms. Bittner,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation and asks for your concurrence on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter with your office, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally ¾ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

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In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

Table 1: Section 106 Consultation Milestones

Event or Action	Date(s)
Undertaking Initiation	11/27/2019
Initial APE Field Inventory	5/20/2020
Presentation to Sitka Historical Preservation Commission	2/10/2021
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Adverse Effect Finding	3/3/2021
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Area of Potential Effect

The APE (direct and indirect) for the proposed project consists of those areas subject to ground disturbance,¹ vibration, visual effects, and noise effects within the upland and offshore areas within 250 feet of the proposed new SPB location on Japonski Island (Figure 4). The direct and indirect APE has been expanded to include revisions to the noise analysis and 65 dB noise level contour, as well as the area of the existing seaplane base that will be decommissioned and deactivated (Figures 5 and 6).

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called “Victoria Dock” at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property premised on your written concurrence that the project will adversely affect SIT-01115.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your concurrence or comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



 Digitally signed by KENDALL DIANNE
CAMPBELL
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Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
[Kendall.D.Campbell@faa.gov](mailto:kendall.D.Campbell@faa.gov)

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
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Electronic cc w/ enclosures:

Kristi Ponozzo, FAA, Environmental Protection Specialist
Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
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Aaron Christie, DOWL Senior Project Manager

References:

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Meinhardt, Robert L., III, and Amy Ramirez. 2017. "Historic Properties Survey, Evaluation, and Determination of Eligibility for the National Register of Historic Places of Four Public Health Service Buildings: Mt. Edgecumbe Medical Center Campus, Sitka, Alaska." Prepared by True North Sustainable Development Solutions, LLC for SouthEast Regional Health Consortium. On file with Alaska Office of History and Archaeology.

Pollnow, Anne E. 2022. "Final Archaeological Monitoring Report for the Sitka Seaplane Base Geotechnical Explorations, Sitka, Alaska: DOWL Project No. 1123.63021.01, FAA Project No. 3-02-0488-001-2019." Prepared by Sea Level Consulting for DOWL. On file with Alaska Office of History and Archaeology.



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New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mrs. Amy Ainslie
Sitka Historic Preservation Commission
100 Lincoln Street
Sitka, AK 99835
amy.ainslie@cityofsitka.org

Dear Mrs. Ainslie

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Consultation

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- Sitka Tribe of Alaska
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- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



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Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
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Fax: 907-271-2851
[Kendall.D.Campbell@faa.gov](mailto:kendall.d.campbell@faa.gov)

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
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- Figure 5: Area of Potential Effect (Noise)
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Electronic cc w/ enclosures:

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Aaron Christie, DOWL Senior Project Manager

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Meinhardt, Robert L., III, and Amy Ramirez. 2017. "Historic Properties Survey, Evaluation, and Determination of Eligibility for the National Register of Historic Places of Four Public Health Service Buildings: Mt. Edgecumbe Medical Center Campus, Sitka, Alaska." Prepared by True North Sustainable Development Solutions, LLC for SouthEast Regional Health Consortium. On file with Alaska Office of History and Archaeology.

Pollnow, Anne E. 2022. "Final Archaeological Monitoring Report for the Sitka Seaplane Base Geotechnical Explorations, Sitka, Alaska: DOWL Project No. 1123.63021.01, FAA Project No. 3-02-0488-001-2019." Prepared by Sea Level Consulting for DOWL. On file with Alaska Office of History and Archaeology.



U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 14, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mrs. Yeidekook'aa Dionne Brady-Howard

Chairwoman

Sikta Tribe of Alaska

204 Siginaka Way

Sitka, AK 99835

dionne.brady-howard@sitkatribe-nsn.gov

lisa.gassman@sitkatribe-nsn.gov

Dear Mrs. Brady-Howard

In respect of your tribal sovereignty and in recognition of the Federal Aviation Administrations (FAA) trust responsibility to Federally Recognized Tribes, I am writing to update you on the FAA Alaskan Region Airports Division review of the City and Borough of Sitka's (CBS) application for federal assistance to be the sponsor of the proposed new Sitka Seaplane Base. The FAA last contacted you regarding this consultation in February 2025 and provided an update describing additional work conducted, including a revised noise analysis memorandum, expansion of the Area of Potential Effect (APE) to include the current Seaplane Base, and additional cultural resources field inventory in the proposed location of the new Seaplane Base, which was conducted by CBS' cultural resources consultant in the Spring of 2024.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the FAA is continuing consultation and requests your review on our amended finding of Adverse Effect to Historic Properties for proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter, dated March 3, 2021.

The FAA finds that one historic property, SIT-01115, would be affected by the proposed project pursuant to 36 CFR 800.4(d)(1), implementing regulations of Section 106 of the National Historic Preservation Act. This submission provides documentation in support of this finding, as required at 36 CFR 800.11(d).

Confidentiality

We understand that you may have concerns regarding the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. The FAA would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained under government-to-government consultation.

Project Background

The CBS has sought federal assistance from the FAA to be the sponsor of the Project. The Project is at the north end of Japonski Island in Sitka, Alaska in Sections 34 and 35 of Township 55 South, Range 63 East of the Copper River Meridian on United States Geological Survey topographical map sheet Sitka A-5 (Figure 1). The existing seaplane base is lineally $\frac{3}{4}$ miles southeast of the proposed Project and has been operating at its current location on the west shore of Baranof Island for over 65 years. The existing seaplane base is at the end of its useful life. The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base.

Project Description

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

The Project has been refined to include the following Marine and Upland components:

Marine Components (0.97 acres)

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- Covered Shelter
- Aircraft tie-downs located along the perimeter of the upland base parking area and approach
- Restroom (location yet to be determined but will be located within the upland base parking area and approach)

In addition, the FAA and CBS have included as part of the project the deactivation and decommissioning of the existing seaplane base located at 435 Katlian Street. The existing seaplane base would cease to be a functional seaplane base with the construction and commissioning of the new proposed facility on Japonski Island (Figure 3). The CBS' deactivation and decommissioning plan would remove the existing floats and ramps but leave the pedestrian ramp and piles in place (approximately 0.21 acres). The site is intended to continue maritime use as a temporary mooring location.

Previous Section 106 Consultation Milestones

As the FAA's Section 106 consultation has been ongoing for several years and has been subject to several pauses in process, the FAA believes that a summary of major procedural milestones is warranted. The major consultation milestones and the dates at which they occurred is presented below in Table 1.

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¹ Ground disturbing activities are defined as any disruption of topsoil or sediments (e.g., trenching), clearing of vegetation, grubbing, ground leveling activities, placement of fill or equipment staging on undisturbed soils. This definition does not include blasting or removal of bedrock.

Summary of Revised Noise Analysis Memorandum

A fourth iteration of the noise analysis for the proposed Project was requested by FAA to incorporate use of the Aviation Environment Design Tool (AEDT) Version 3e, applying non-standard AEDT substitutions to reflect the fleet mix anticipated, and the use of hard ground attenuation to accurately model for sound travelling over water. As described in the February, 2025 Consultation Update the analysis found that there is a noticeable decrease in sensitive noise receptor Day-Night Average Sound Level (DNL) between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7, with no change in DNL at receptor 6, and an increase at receptor 8. Despite the increased noise level at receptor 8, all receptors remain below the 65 decibel (dB) DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

Identification Efforts

DOWL conducted a literature review and field investigations. Literature review included assessment of previously identified cultural resources within 500 ft of the APE and cultural resources investigations conducted within the project MTRS recorded in the Alaska Heritage Resources Survey (AHRS) portal or listed on the National Register of Historic Places (NRHP) or as a National Historic Landmark (NHL). The literature review was originally completed by Caitlin Kennedy prior to survey in May 2020 and was reviewed again by Emily Corley prior to survey in May 2024, both of whom meet the Secretary of the Interior Professional Qualifications Standards for archaeology.

The Project APE and surrounding areas have been subject to numerous previous studies for historical, archaeological, architectural, and other cultural resources. Within the APE these studies have largely focused on identification and documentation of features associated with World War (WW) II-era military facilities. On May 20, 2020, DOWL Cultural Resources Specialist Caitlin Kennedy conducted a field survey of the proposed APE of the Sitka Seaplane Base Project and identified a previously undocumented concrete observation post (SIT-01115) (DOWL 2021). An additional field effort in 2022 focused on providing archaeological monitoring of geotechnical investigations within the upland portions of the site resulted in the identification of several additional features, collectively recorded as AHRS site SIT-01124. These features included a possible gun emplacement or beach defense fortification, a circular, bermed feature, a shell midden, and a dry-stacked rockery wall (Sea Level Consulting, 2022).

In both Section 106 and Government-to-Government Consultation with the FAA, STA articulated a concern that human remains or burials may be present within the original uplands area of the APE, and that additional field inventory was warranted. FAA concurred, and on May 24 and 25, 2024, DOWL Cultural Resources Specialists conducted an archaeological field inventory within the APE of the proposed new Sitka Seaplane Base. The fieldwork was led by DOWL's Cultural Resource Manager, Jake Anders, who meets Secretary of the Interior's Professional Qualifications Standards for archaeology, and was assisted by archaeologist Emily Corley, who specializes in human osteology. DOWL and CBS coordinated with STA regarding the timing of the fieldwork, but due to timing conflicts, STA representatives were not able to accompany DOWL staff during the field inventory. The field inventory included an extensive pedestrian survey of the project APE, and two subsurface tests were excavated to examine the subsurface for buried archaeological materials and/or human remains; both subsurface tests were negative for cultural or archaeological

materials. DOWL's survey did confirm the presence of previously documented World War II (WWII) -era features, and identified additional, previously unknown features within and adjacent to the APE.

DOWL also completed an additional inventory for historic properties at the existing seaplane base to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties.

A copy of DOWL's field inventory report, including both the new and existing seaplane base locations, is attached.

Determination(s) of Eligibility

SIT-01124 (Rockery Wall, Trench Features, and Depressions) contains eight features adjacent to SIT-00079 (Sitka NOB and U.S. Army Coastal Defense NHL). The features of SIT-01124 are a raised circular feature, rockery wall feature, two rectangular pits (Features 1 and 2), a trench system, possible privy pit (Feature 3), an L-shaped stacked log wall (Feature 4), and a circular depression (Feature 5). The features are spread across 1.0 acres on the north end of Japonski Island. Despite spatial proximity, no association has been established between SIT-01124 and SIT-00079. DOWL has been unable to link the features to any period of use, significant events (Criterion A), or significant person(s) (Criterion B). Furthermore, the site has not been found significant for workmanship (Criterion C) or for its data potential (Criterion D). Additionally, SIT-01124 lacks integrity of design, materials, workmanship, feeling, and association. Therefore, DOWL recommends SIT-01124 is not eligible for listing in the National Register of Historic Places (NRHP) and recommends FAA seek concurrence on this recommendation from the Alaska State Historic Preservation Officer (SHPO).

DOWLs inventory and evaluation of SIT-01172 (Historic Sitka Seaplane Base) indicates that a pier and dock existed at the location off of Katlian Street prior to 1948 (called "Victoria Dock" at the time), but the original structure was smaller than the extant structure. The structure seen today was constructed after 1964. DOWL has not found indication that the existing seaplane base is significant under any Criteria A through D. Additionally, review of aerial imagery indicates that the existing seaplane base has undergone several additions and removals of materials since 1948, including recent alterations around 1965, 1979, 1999, and 2019, resulting in a loss of integrity. Therefore, DOWL recommends that the existing seaplane base is not eligible for listing in the NRHP and recommends FAA seek concurrence on this recommendation from the SHPO.

DOWL previously evaluated the eligibility of SIT-01115 and recommended it as eligible for listing in the NRHP under Criteria A and C. The State Historic Preservation Officer concurred with that determination in 2021. During analysis, one feature identified by Sea Level during geotechnical monitoring in 2022 and documented by DOWL in 2024, was tentatively associated with the Japonski Island Observation Post and was subsequently incorporated into SIT-01115. DOWL believes this does not alter the evaluation completed in 2021 and recommends that SIT-01115 remain eligible for listing in the NRHP.

FAA agrees with DOWL's recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

The Japonski Island Observation Post and Gun Emplacement (SIT-01115) will be destroyed during proposed project activities. The FAA continues to find that the project will result in an Adverse Effect to Historic Properties. The FAA will continue consultation to resolve the adverse effect pursuant to 36 CFR §800.6.

Section 4(f)

It is the FAA's intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

The following consulting parties are being notified of this updated Finding of Effect:

- National Park Service
- Sitka Tribe of Alaska
- Sitka Historic Preservation Commission
- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
- Alaska Association for Historic Preservation
- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

If you wish to provide comments related to this proposed Project or engage FAA in government-to-government consultation, please contact Kendall Campbell, Alaska Region Airports Division, at the address above, at 907-271-5030, or by e-mail at Kendall.D.Campbell@faa.gov.

FAA requests your input on our proposal so that we can incorporate your concerns into Project development. Your timely response will greatly assist our compliance efforts and the preparation of any required environmental documentation. For that purpose, we request that you respond within thirty days of your receipt of this correspondence.

Sincerely,



Digitally signed by KENDALL
DIANNE CAMPBELL
Date: 2025.05.14 15:59:59 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
Anchorage, Alaska 99513
Phone: 907-271-5030
Fax: 907-271-2851
Kendall.D.Campbell@faa.gov

Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

- Kristi Ponozzo, FAA, Environmental Protection Specialist
- Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
- Jenny Liljedahl, Professional and Technical Services, Project Manager
- Aaron Christie, DOWL Senior Project Manager

References:

- Arend, Chris. 2012. "Historic American Buildings Survey: Old Powerhouse, Mt Edgecumbe High School (MEHS) Sitka, Alaska." On file with Alaska Office of History and Archaeology.
- Bosak, Meagan. 2021. "Request for SHPO Section 106 Review (36 CFR 800) For the Halibut Point Road Site Preparation Project." Prepared by SouthEast Alaska Regional Health Consortium. On file with Alaska Office of History and Archaeology.
- Kennedy, Caitlin, and Jacob Anders. 2021. "Determination of Eligibility Recommendation: Japonski Island Observation Post (SIT-01115) Sitka, Alaska." Prepared by DOWL for Federal Aviation Administration on behalf of the City and Borough of Sitka. On file with Alaska Office of History and Archaeology.
- Lawrence, Rhoda A.R. 2016. "Historic American Building Survey for the Sitka Naval Operating Base Junior Officers' Quarters Building No. 21, Sitka, Alaska." Prepared by BOLA Architecture + Planning. On file with Alaska Office of History and Archaeology.
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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14
Anchorage, Alaska
99513-7587

May 15, 2025

Reply Refer To:

New Sitka Seaplane Base

Federal Project # 3-02-0488-001-2019

Adverse Effect to Historic Properties

ATTENTION: This finding contains two DOE

Mr. Randy Vigil

Chief

Southeast Section Regulatory Division

Alaska District, U.S. Army Corps of Engineers

PO Box 22270

Juneau, Alaska 99802-9998

randal.p.vigil@usace.army.mil

Dear Mr. Vigil,

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) 800, the Federal Aviation Administration Alaska Region Airports Division (FAA) is continuing consultation on our amended finding of Adverse Effect to Historic Properties for the City and Borough of Sitka's (CBS) proposed new Sitka Seaplane Base (Project). This letter succeeds the original findings letter with your office, dated March 3, 2021.

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FAA agrees with DOWL’s recommendations that SIT-01124 and SIT-01172 are not eligible for listing in the NRHP and seek concurrence from the SHPO on these eligibility determinations.

Finding of Effect

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Section 4(f)

It is the FAA’s intent to make a Section 4(f) finding of physical use of a Section 4(f) property following a determination that there are no feasible or prudent alternatives to avoid using the property.

Consultation

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- Sealaska Corporation
- Sealaska Heritage Institute
- Central Council Tlingit & Haida Indian Tribes of Alaska
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- Sea Level Consulting
- United States Army Corps of Engineers

FAA Contact Information

Please direct your comments to Kendall D. Campbell, Regional Tribal Consultation Official by e-mail at kendall.d.campbell@faa.gov.

Sincerely,



Digitally signed by KENDALL

DIANNE CAMPBELL

Date: 2025.05.15 16:50:52 -08'00'

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
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Enclosures:

- Figure 1: Project vicinity
- Figure 2: Proposed Project Components (New Seaplane Base)
- Figure 3: Current Proposed Action (Existing Seaplane Base)
- Figure 4: Area of Potential Effect (New Seaplane Base)
- Figure 5: Area of Potential Effect (Noise)
- Figure 6: Area of Potential Effect (Existing Seaplane Base)
- Office of History and Archaeology Coversheet
- Cultural Resources Report: Sitka Seaplane Base

Electronic cc w/ enclosures:

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Jenny Liljedahl, Professional and Technical Services, Project Manager
Aaron Christie, DOWL Senior Project Manager

References:

Arend, Chris. 2012. "Historic American Buildings Survey: Old Powerhouse, Mt Edgecumbe High School (MEHS) Sitka, Alaska." On file with Alaska Office of History and Archaeology.

Bosak, Meagan. 2021. "Request for SHPO Section 106 Review (36 CFR 800) For the Halibut Point Road Site Preparation Project." Prepared by SouthEast Alaska Regional Health Consortium. On file with Alaska Office of History and Archaeology.

Kennedy, Caitlin, and Jacob Anders. 2021. "Determination of Eligibility Recommendation: Japonski Island Observation Post (SIT-01115) Sitka, Alaska." Prepared by DOWL for Federal Aviation Administration on behalf of the City and Borough of Sitka. On file with Alaska Office of History and Archaeology.

Lawrence, Rhoda A.R. 2016. "Historic American Building Survey for the Sitka Naval Operating Base Junior Officers' Quarters Building No. 21, Sitka, Alaska." Prepared by BOLA Architecture + Planning. On file with Alaska Office of History and Archaeology.

Mahoney, Ken. 2012. "Letter Re: MEHS Old Powerhouse Building Demolition." On file with Alaska Office of History and Archaeology.

Meinhardt, Robert L., III, and Amy Ramirez. 2017. "Historic Properties Survey, Evaluation, and Determination of Eligibility for the National Register of Historic Places of Four Public Health Service Buildings: Mt. Edgecumbe Medical Center Campus, Sitka, Alaska." Prepared by True North Sustainable Development Solutions, LLC for SouthEast Regional Health Consortium. On file with Alaska Office of History and Archaeology.

Pollnow, Anne E. 2022. "Final Archaeological Monitoring Report for the Sitka Seaplane Base Geotechnical Explorations, Sitka, Alaska: DOWL Project No. 1123.63021.01, FAA Project No. 3-02-0488-001-2019." Prepared by Sea Level Consulting for DOWL. On file with Alaska Office of History and Archaeology.