APPENDIX F:

SECTION 4(F) EVALUATION

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Sitka Seaplane Base

Sitka, Alaska

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ACRONYMS & ABBREVIATIONS

CBS .....City and Borough of Sitka
DOE.....Determination of Eligibility
FAA.....Federal Aviation Administration
FHWA.....Federal Highway Administration
MOA .....Memorandum of Agreement
NHL .....National Historical Landmark
NHPA.....National Historic Preservation Act
NOB..... Sitka Naval Operating Base
NPS .....National Park Service
NRHP ..... National Register of Historic Places
SHPC.....Sitka Historic Preservation Commission
SHPO .....State Historic Preservation Office
SPB .....Seaplane Base
STA..... Sitka Tribe of Alaska
U.S.C. .....United States Code
USCG .....U.S. Coast Guard
WWII.....World War II

1.0 INTRODUCTION

The City and Borough of Sitka (CBS) is proposing to construct a new Seaplane Base (SPB) as the existing Seaplane Base (SPB) is deteriorating and has been in operation for 65 years and is at the end of its useful life. The proposed SPB would occur within the boundaries of lands currently owned by CBS and replace the existing SPB.

Publicly owned wildlife refuges, parks and recreation areas, and historic sites listed on, or eligible to be listed on, the National Register of Historic Places (NRHP) are protected from transportation impacts by Section 4(f) of the Department of Transportation Act of 1996 (as amended), 49 United States Code (U.S.C.) §303(c), Transportation Act. There are no wildlife refuges, parks, or recreation areas located in the Project area.

The Sitka Naval Operating Base (NOB) and U.S. Army Coastal Defenses National Historic Landmark (NHL) is adjacent to the proposed SPB site and listed on the NRHP and is therefore protected by Section 4(f). Additionally, a World War II (WWII) observation post and gun emplacement, eligible for listing in the National Register of Historic Places is located within the proposed SPB. The observation post and gun emplacement site has been determined eligible by SHPO for listing in the NRHP for its national significance in association with World War II military preparedness on Japonski Island. The proposed project would adversely affect the observation post and gun emplacement. Consultation with SHPO, the National Park Service (NPS), the Sitka Tribe of Alaska (STA), and the Sitka Historic Preservation Commission (SHPC) to mitigate adverse effects is ongoing. The resolutions agreed upon will be memorialized in a Memorandum of Agreement (MOA) evidencing the FAAs compliance with Section 106 of the National Historic Preservation Act (NHPA).

This document memorializes analysis conducted to determine if there are feasible and prudent alternatives to using a Section 4(f) resource (observation post and gun emplacement).

1.1 Section 4(f) Guidelines

Per Section 4(f), the Secretary of Transportation may approve a transportation project requiring the use of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if both the following conditions apply:

- there is no prudent and feasible alternative to using that land
- the program or project includes all possible planning to minimize harm to the historic site resulting from the use

To determine if there are prudent or feasible alternatives to using the Section 4(f) property, guidance from Federal Highway Administration (FHWA) regulations (23 Code of Federal Regulations [CFR] 774) was used as the Federal Aviation Administration (FAA) uses this guidance in implementing Section 4(f) impact analysis and documentation. Section 5 details analysis conducted to determine if any feasible or prudent alternative to the proposed action exists.

1.2 Project Action

As shown on Figure 1 (Appendix A), the existing SPB is located across Sitka Channel from the proposed SPB on Baranof Island. The existing SPB has no potential for expansion. The new SPB would be located near 1190 Seward Avenue on the northwest side of Japonski Island, approximately 1.4 miles west of downtown Sitka, Alaska and approximately 600 miles from Anchorage at 57.055418 Latitude; -135.363889 Longitude (Sec. 34 and 35, T55S, R63E, Copper River Meridian, United States Geological Survey Quadrangle Sitka A5).

The proposed action is to construct a new SPB in Sitka Channel (Figure 2; Appendix A) and deactivate the existing SPB. The current proposed action consists of the following:

Marine Components (0.97 acres)

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

Upland Base Parking Area and Approach (1.96 acres)

- Seaplane Haulout Ramp (230 x 30 feet)
- Utilities include electricity, water, and lighting
- Security fencing (934 linear feet)
- 14 Parking spaces
- Vegetative Buffer (0.12 acres)
- Access Driveway (200 x 23 feet)
- Covered Shelter
- Other Services (locations to be determined at next design phase)
    - Aircraft tie-downs
    - Maneuvering room
    - Fire Truck Access
    - Restroom

Existing Seaplane

- Deactivate and decommission once new SPB is operational
- Remove existing floats and ramps but leave piles in place

Related actions include obtaining FAA approving the existing SPB remaining in CBS ownership and not reverting to federal ownership when no longer needed for airport property purposes and transferring A29 designation to the proposed SPB.

2.0 PURPOSE AND NEED

The purpose of the Project is to provide safe and reliable access to Sitka, Alaska by constructing a new SPB to address current capacity, safety, operational, and condition deficiencies at the existing Sitka SPB. The current base has insufficient capacity and space to accommodate current and future demand; a congested location with conflicting adjacent uses; poor, unsafe dock conditions for fueling and maneuvering on the docks; and congested sea lane and bird hazard conditions.

3.0 SECTION 4(F) PROPERTY

3.1 Observation Post and Gun Emplacement

The Section 4(f) property affected by the proposed action is an intact observation post with associated gun emplacement located on the project site (AHRS SIT-01115). DOWL documented the observation post during a site visit in May 2020 and recommended the structure as eligible for inclusion to the NRHP. A gun emplacement was recorded by Anne Pollnow during archaeological monitoring of geotechnical activities in 2022 (Pollnow 2022). In 2025 the gun emplacement was incorporated into SIT-01115 for its likely association with operation of the observation post.

This observation post was constructed by Marine or Army infantry as part of series of small coastal fortifications that used to ring Japonski, Alice and Charcoal Islands. These small defensive positions would have been second priority defensive positions, which, depending on whether actively engaged with the enemy, ranged from foxholes and trenches to more elaborate concrete buildings such as this. Construction of aboveground defensive positions and observation posts during World War II were used under various circumstances, including when groundwater levels prevented construction of cut-and-cover shelters. Reinforced concrete was preferred for aboveground shelters to offer protection from enemy fire. Surface shelters provided “maximum observation and exit facility” and could be further hidden from view and reinforced with layers of earth (U.S. War Department 1940:206–219).

FAA determined AHRS SIT-01115 eligible for the NRHP under Criterion A for its association with coastal defense of Alaska during WWII. AHRS SIT-01115 retains integrity of location, materials, design, feeling, and association. Despite showing wear from decades of disuse, it still neatly conveys its original purpose as one of a series of observation posts that once dotted the coastline of the Sitka NOB and U.S. Army Coastal Defenses NHL.

Although the ruins of several concrete structures are extant in the Sitka NOB and U.S. Army Coastal Defenses NHL, this building is thought to be one of two intact observation posts of this type on Japonski, Alice, and Charcoal islands (M. Hunter personal communication to C. Kennedy [DOWL], August 7, 2020). SHPO concurred that SIT-01115was eligible for inclusion in the NRHP in March 2021 and again in August 2025.

4.0 IMPACTS TO THE SECTION 4(F) PROPERTY

The proposed project includes the demolition of the observation post and gun emplacement (AHRS SIT-01115) for construction of the transportation facility; therefore, Section 4(f) is triggered. Pursuant to 36 CFR 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act (NHPA), FAA has found, and the SHPO and NPS have concurred, that the Proposed Action would adversely affect SIT-01115. Therefore, Section 4(f) applies to this federal undertaking.

5.0 ALTERNATIVES

5.1 Avoidance Alternatives

Feasible and prudent alternatives to avoid the Section 4(f) property must meet the proposed project's purpose and need.

5.1.1 Alternative Location

Selection of an alternative location for the proposed SPB would avoid use of AHRS SIT-01115. To determine if the SPB could be constructed in another location, CBS completed three siting studies between 2002 and 2016 to determine the appropriate site for the new SPB. Each siting study identified the proposed project site as the site that best meets project safety and operational requirements. Project-based criteria used to develop alternatives included:

- favorable wind conditions
- protected from harsh waves and sea swells
- adequate depth, with no obstacles such as rocks
- not lie in proximity to wildlife attractants
- room for expansion over current facility
- favorable topography and space for parking

If sites did not meet these factors, they were not developed as alternatives.

Table 1 lists 12 alternative sites that were evaluated in 2002, 2012, and 2016 (HDR 2002; DOWL HKM 2012; DOWL 2016; Figure 3 in Appendix A).

Table 1: Avoidance Location Comparison

Alternative	Project-Based Criteria
Starrigavan Bay	• No protection from open ocean swells • Large wind chop from southeast, north and west • Water typically choppy and rough • Wakes from large boats and ferry • No room for upland development • Large salmon and waterfowl use • Too far from town for seaplane pilots and community

Alternative	Project-Based Criteria
Existing Site	• Rocks and boulders under the water • Wildlife hazard from adjacent fish processing plant • Fishing and boat traffic conflicts • Inadequate size for safe maneuvering room • Cannot meet existing and forecast demand • No upland area for support facility development • Narrow wingtip clearances between seaplanes
Eliason Harbor	• Constrained by large boat harbor and shallow water • Insufficient space at low tide for safe seaplane passage without significant dredging • Salmon run in vicinity • Cost-prohibitive dredging and development needs • High-value wetlands in intertidal area • Freezing concern due to freshwater concentration from anadromous stream • Dense boat traffic • Possible strong local opposition to upland development for seaplane facilities
Mt. Edgecumbe	• More aircraft noise in residential and institutional areas • More exposure of dock to wind and wave action • Concern over north and west winds • Insufficient uplands for future seaplane base development
SEARHC Cove	• Closer to residential and institutional area • More exposure of dock to wind and wave action • More potential to affect eelgrass habitat
Japonski Lagoon	• Incompatible with Sitka Airport Master Plan • Maintains wildlife hazard posed by lagoon • Wind exposure • Sea lane only partially protected from sea swells and larger waves • Expense of blasting sea lane channel • No breakwater protection for sea lane east side
Charcoal Island	• Wave, sea swell, and wind energy • Long taxi into Sitka Channel • Large wind chop from prevailing winds • Expense of constructing breakwater protection
Sawmill Cove	• Long fetch of Silver Bay with direct access to open ocean via Eastern Channel • Large wind chop from prevailing winds • Strong and turbulent winds from Blue Lake • Topography limits during cloudy or foggy conditions • Too far from town for seaplane pilots and community
Safe Harbor	• Exposed to prevailing winds and waves • Close proximity to U.S. Coast Guard (USCG) vessel dock and operations • Wildlife hazards from seafood processing sites
Work Float	• Not well protected from wind • Lack of feasible relocation for work float use • Close proximity to USCG vessels/dock • Difficult to control access to storage area and dock • Heavy boat traffic at fueling facility and mouth of harbor under bridge • Insufficient area for upland development
Jamestown Bay	• Turbulent wind due to surrounding topography • Excessive downwind takeoffs • Exposure to southwest swells • Dense small and large boat traffic • Upland area mostly residential

Alternative	Project-Based Criteria
Herring Cove	• Long fetch of Silver Bay with direct access to open ocean via Eastern Channel • Large wind chop from prevailing winds • Strong and turbulent winds from Blue Lake • Topography creates safety hazards during cloudy or foggy conditions • Too far from town for seaplane pilots and community

Sources: HDR 2002; DOWL HKM 2012; DOWL 2016

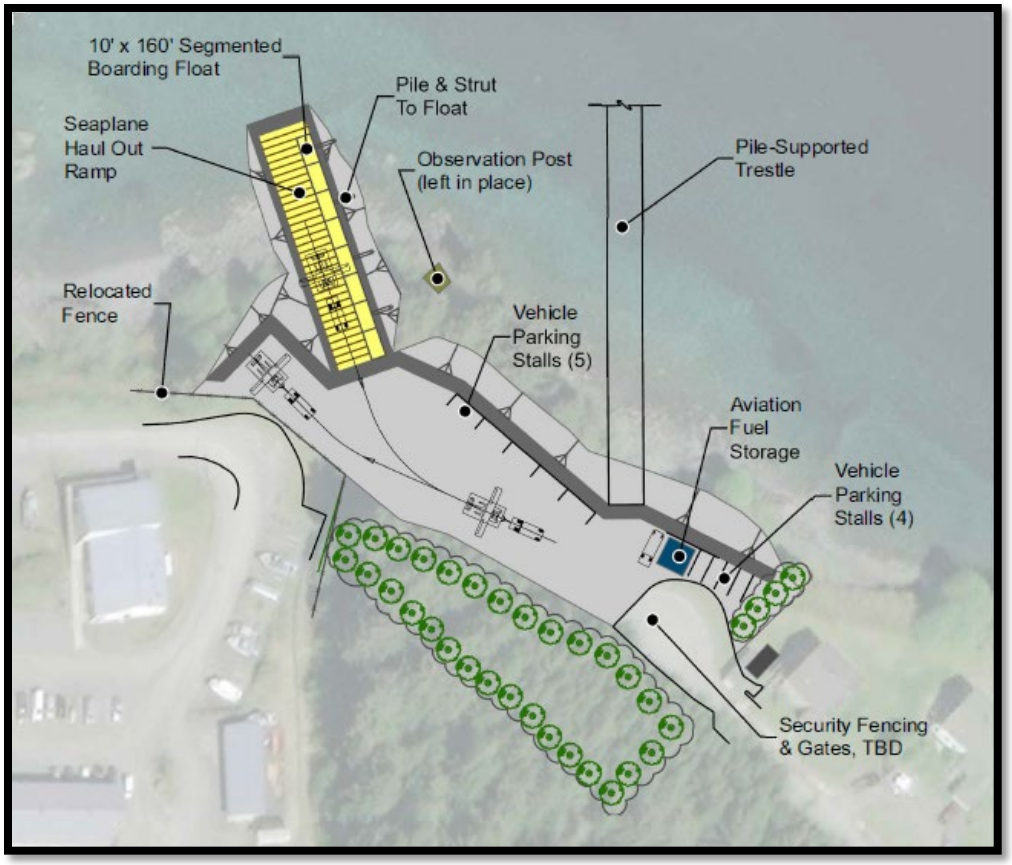
Two areas were not evaluated at all due to their infeasibility from substantial physical limitations:

1. Sites along the shoreline to the north were not developed into alternatives due to high exposure to waves, swells, and strong winds. Sitka Sound is exposed to the North Pacific Ocean and Gulf of Alaska with few islands or reefs to protect it or absorb wave energy. Sea swells and open ocean conditions make any unprotected site less than desirable for SPB facilities and normal seaplane operations. This limits the potential for SPB development to only a few locations that have adequate protection. These are included in Table 1.

2. The use of Blue Lake was not considered it is controlled by hydroelectric facilities and as such experiences unpredictable and large fluctuations in the water level (up to 60 feet). The inconsistency of water levels would not only result in the inability to safely site a ramp, but the surrounding topography is also unsafe, with fluctuation in water elevation also causing the airspace to fluctuate in kind. Another minor reason for the infeasibility of this site is the lack of available area at the end of the road to expand into the lake with infrastructure and an access road that is subject to avalanches during the winter.

5.1.2 Preserve in Place

FAA evaluated the potential to preserve SIT-01115 in-situ and determined a re-design the SPB facilities would be required. Available land constraints make incorporation of the site into a design infeasible. In addition, the gun emplacement cannot be avoided as it is embedded in the native ground and would be buried, destroyed, or obstructed by apron construction. The proposed SPB must be able to provide safe maneuvering and operations, while supporting future growth and sustaining itself through user fees. As shown in the map below, the need to level the site's steep topography reduces adequate room for support facilities.



5.2 Minimization Alternatives

As the location of the proposed SPB was the only feasible siting option, minimization alternatives were focused solely on the observation post as the gun emplacement cannot be avoided due to its elevation and being a feature of the ground itself. Minimization alternatives focused on adjusting site design to minimize impacts. Analysis is ongoing until Section 106 is completed.

5.2.1 Incorporate Observation Post into Apron

Impacts to the observation post could be minimized by keeping it in-situ and constructing the apron around it. To determine the feasibility of this alternative, and if it would be prudent, the structural integrity of the observation post and aviation and operational considerations were evaluated (Appendix B). From an engineering perspective, the observation post is structurally sound to remain in-situ provided it is stabilized and preserved in place.

5.2.2 Adjust Location of Haul Out Ramp

Moving the haul out ramp would shift the configuration of the apron to potentially allow the observation post to remain in place by avoiding aviation and operational constraints (as described in detail in Appendix B). The haulout ramp, as proposed, is configured primarily to minimize impacts from larger waves, which are predominantly from northwest direction. Both predominant winds and waves are from the east/southeast however the largest waves are generated out of northwest due to the

longer open water fetch. Placing the ramp on the west side of the facility as proposed provides the best wave protection from these two directions. Moving the haulout ramp to a different location along the apron is constrained by existing topographic conditions and was designed to be placed inside an existing bedrock knoll in the intertidal zone to afford maximum protection. Moving the alignment or position of the haulout ramp would make it susceptible to adverse wind and wave conditions.

5.3 Mitigation Alternatives

5.3.1 Relocate Observation Post

Mitigation measures would be implemented as avoidance and minimization measures are not possible and do not result in the preservation of the integrity of the site. Relocating the observation post to a different location in the vicinity of the original location or in a location with a similar viewshed was evaluated to minimize adverse effects. The observation post has been preliminarily evaluated for engineering integrity for movement, which is detailed in Appendix B. Relocation of the observation post to either a new location near the existing site or on the apron would require the use of cranes, jacks, temporary shoring, and heavy transportation equipment. If the structure were cast directly on bedrock, which is likely given observed surface conditions, removal of the full foundation would not be practical. In that case, the structure could only be partially relocated by separating the walls and roof from the floor slab. This process would involve saw cutting at the base of the walls, disconnecting the superstructure from the foundation, and then transporting the walls and roof as a unit to a newly constructed foundation. Even with this approach, temporary shoring and strengthening measures would not eliminate the probability of structural failure during lifting and transportation due to the age and condition of the materials in the structure. Partial relocation would also require de-construction and building elements would not likely survive movement.

Successful relocation of the observation post has a low probability of success because the observation post was built to remain in one place and not designed to withstand transportation forces and the risk of structural failure during moving is high. Additionally, relocation on the current property or in a similar viewshed is not prudent as there is no location on site that would allow the project to meet the FAA safety criteria as discussed in 5.2 while retaining the same viewshed. Moving the structure to a different location would diminish the integrity of the historic property and would subject it to forces and stresses it was never designed to accommodate, including lifting, bending, and vibration loads not present in its original wartime context.

5.3.2 Rehabilitation of Existing Similar Structure on Japonski Island

The project sponsor has identified a similar outlook post on Japonski Island on CBS Lands near the wastewater treatment plant. This outlook post is not included in the Sitka Naval Operating Base (NOB) and U.S. Army Coastal Defenses National Historic Landmark, nor is it listed as a historic property in the AHRS. The location of this outlook post is currently accessible to the public, although its location is not well known. Rehabilitation of this existing outlook post would include full recordation of the site to include HABS/HAER drawings of the structure. In addition, a preservation and maintenance plan for the structure would be developed for CBS. The site would be cleaned of garbage and hazards and CBS would work with Sitka Trail Works to improve the trail to the structure. A plaque and signage would inform the public of the site function and dates of use.

5.3.3 Replicate Observation Post

Replicating the observation post would incorporate design features of the Observation Post into the covered seaplane passenger waiting area and use HABS documentation, including photographs, descriptions, or three-dimensional scanning, to replicate design features. Options include designing the passenger waiting area to include recreation of the observation slit in the appropriate orientation to mimic the view from SIT-01115, display of a reduced scale replica of SIT-01115, and interpretive sign discussing the Observation Post and its role in the U.S. Coastal Defenses during WWII. Determining the size and location would occur during final site design. Materials used would be appropriate to the size and location of the replica and would be approved by FAA, as the funder, and CBS, as the party responsible for maintenance, during final site design.

6.0 EVALUATION OF FEASIBLE AND PRUDENT OPTIONS

The following criteria were used to determine if a "feasible and prudent avoidance alternative" exists (23 CFR 774.17):

1. An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
2. An alternative is not prudent if:
    I. It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
    II. It results in unacceptable safety or operational problems;
    III. After reasonable mitigation, it still causes:
        A. Severe social, economic, or environmental impacts;
        B. Severe disruption to established communities;
        C. Severe disproportionate impacts to minority or low-income populations; or
        D. Severe impacts to environmental resources protected under other Federal statutes;
    IV. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
    V. It causes other unique problems or unusual factors; or
    VI. It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

Feasible and prudent alternatives to avoid the Section 4(f) property must meet the proposed project's purpose and need. The term "prudent" refers to rationale judgment. Under FAA Order 5050.4B, paragraph 1007.e(5)(a), a project can be eliminated if it might be feasible or technically possible, but not rational when one considers its safety, policy, environmental, social, or economic consequences. Factors used to evaluate if an alternative is prudent are shown in Table 2 as defined in 23 CFR 774.17.

Table 2: Factors Used to Evaluate if An Alternative is Prudent

(A)	Does the alternative compromise the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need?
(B)	Does the alternative cause unacceptable safety or operational problems?
(C)	Does the alternative cause severe social, economic, or environmental impacts after reasonable mitigation?
(D)	Does the alternative cause severe disruption to established communities after reasonable mitigation?
(E)	Does the alternative cause severe disproportionate impacts to minority or low-income populations after reasonable mitigation?
(F)	Does the alternative cause severe impacts to environmental resources protected under other federal statutes after reasonable mitigation?
(G)	Does the alternative result in additional construction, maintenance, or operational costs of an extraordinary magnitude?
(H)	Does the alternative cause other unique problems or unusual factors?
(I)	Does the alternative involve multiple factors listed above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude?

6.1 Avoidance Alternatives

6.1.1 Alternative Location

None of these alternative sites meet the standard for a prudent alternative, as documented in Table 3.

Table 3: Alternative Location Evaluation

Alternative	Factors to Determine if Alternative is Prudent
Starrigavan Bay	A – Safety risks s, lack of upland facilities, and distance from community activity area compromise ability to meet purpose and need. B – Unacceptable safety risks related to exposure to open water with wind from several areas, choppy and rough water, and large wakes from large boats and ferries; unacceptable operational concerns due to distance from community and lack of potential for upland facilities. C – Environmental concerns regarding salmon and waterfowl use. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, C, and G cumulatively result in problems of extraordinary magnitude.
Existing Site	A – Safety risks, inadequate space for aircraft parking and maneuvering, and lack of room for upland facilities compromise project's ability to meet purpose and need. B – Unacceptable safety concerns related to bird hazards, other water user conflicts, tight maneuvering area. Operations are limited at low tide. H – There is virtually no potential for upland facilities. I – The combination of factors A, B, and H cumulatively result in problems of extraordinary magnitude.
Eliason Harbor	A – Safety risks and lack of space for upland facilities would compromise purpose and need. B – Unacceptable safety concerns related to high boat use, shallow waters, and icing. C – Social, economic, and environmental concerns. Conflicts with fishing and other boating uses that are important to Sitka's social and economic identity. Environmental concerns regarding salmon and waterfowl use. H – Uplands completely developed; little opportunity for upland support facilities. I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.

Alternative	Factors to Determine if Alternative is Prudent
Mt. Edgecumbe	A – Lack of potential for upland facilities compromises purpose and need. B – Safety risks related to exposure to wind and waves. C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL. H – Uplands completely developed; little opportunity for upland support facilities. I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.
SEARHC Cove	B – Safety risks related to exposure to wind and waves. C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.
Japonski Lagoon	B –Safety risks related to exposure to wind and waves in proposed operations area; retains wildlife hazard proposed to be mitigated through Sitka Airport Master Plan. C – Social, economic, and environmental concerns due to incompatibility with Sitka airport; impacts on Sitka airport has potential for substantial economic and social effects. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.
Charcoal Island	A – Distance from activities focus in Sitka Channel and safety risks regarding wind and wave exposure and conflicts with Sitka airport operations compromises project's ability to meet purpose and need. B – Safety concerns with operations area from open water wind and wave exposure, and conflicts with Sitka Airport operations. I – The combination of factors A and B cumulatively result in problems of extraordinary magnitude.
Sawmill Cove	A – Safety risks and distance from community compromise ability to meet purpose and need. B – Unacceptable safety concerns; related to open ocean waves, strong and turbulent winds, and topography. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.
Safe Harbor	A – Safety risks related to wind and wave exposure and lack of upland development potential compromise ability to meet purpose and need. B – Unacceptable safety concerns; conflicts with USCG vessel operations. C – Land use compatibility concerns due to USCG operations and noise near high school. I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.
Work Float	A – Safety risks and lack of upland development potential compromise ability to meet purpose and need. B – Unacceptable safety concerns; conflicts with boat fueling area and USCG vessel operations. C – Land use concerns related to displacement of current work float use and noise near high school. I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.
Jamestown Bay	B – Unacceptable safety risks related to wind and wave exposure and turbulent winds due to topography. Conflicts with small and large boat traffic. C – Land use compatibility concerns with residential area. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.
Herring Cove	A – Safety risks and distance from community compromise ability to meet purpose and need. B – Unacceptable safety risks; unacceptable operational concerns due to distance from community and lack of potential for upland facilities. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.

Sources: HDR 2002; DOWL HKM 2012; DOWL 2016

6.1.2 Preserve in Place

Preserving SIT-01115 in place would require a smaller development plan with the observation post intact and the seaplane facility built around it. The preserve in place alternative was determined not to be prudent for the following factors (from Table 2).

- Factor A: The smaller upland operation area, lack of a seaplane ramp, and higher construction cost for the marine facilities due to the length of the trestle would compromise project's ability to meet purpose and need.
- Factor B: This alternative results in unacceptable safety and operational problems. The steep topography of the site limits the potential for a seaplane ramp and seaplane parking and maneuvering area as well as room for future lease lots to contribute funds to support the facility.
- Factor I: The combination of factors A and B cumulatively result in problems of extraordinary magnitude.
- Factor H: The configuration and reduced size creates an inefficient approach and use of the haulout ramp and reduces the capacity of the apron and does not meet the purpose and need of future development to meet future growth .

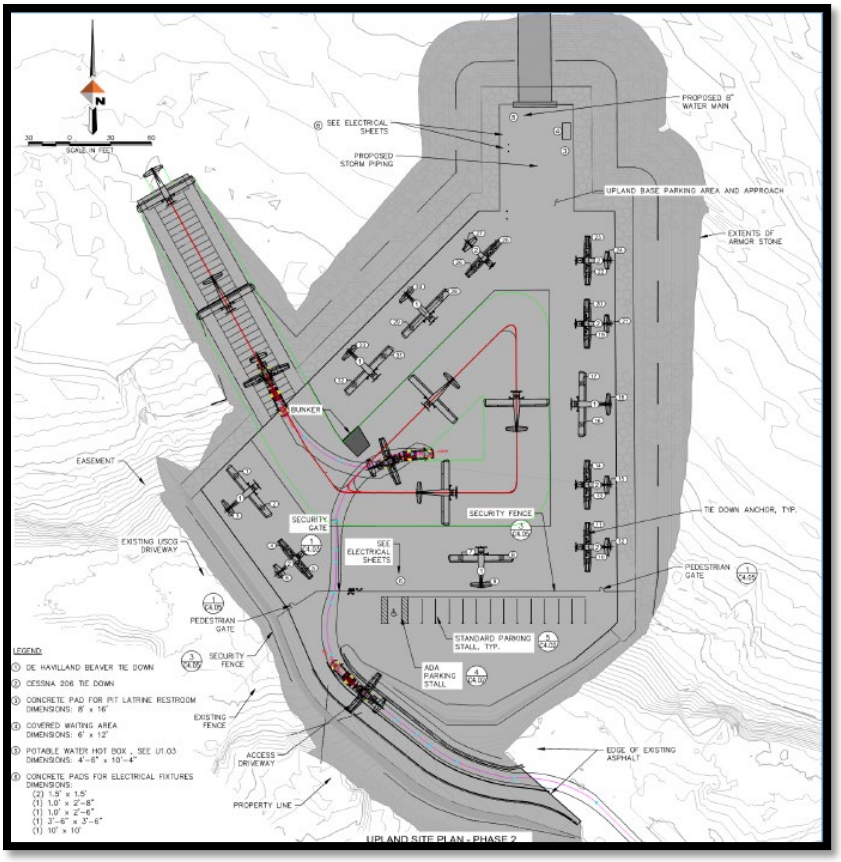
6.2 Minimization Alternatives

6.2.1 Incorporate Observation Post into Apron

Although the observation post is structurally sound to remain in-situ, doing so without redesigning the apron would not be prudent for the following factor (from Table 2).

- Factor B: This alternative results in unacceptable safety and operational problems as the observation post lies within the wingspan envelope for the critical design aircraft. It prevents the taxiway safety area from being free of objects, and its location impedes the minimum unobstructed turning diameter and blocks the area where towing vehicles must maneuver seaplanes on trailers. Furthermore, when towing aircraft, potential conflicts extend beyond wingtips; aircraft with wide floats or wing bracing could strike objects even below wing height.
- ADD Factor G H – takes away the apron entirely and creates an un-efficient ramp – cost does not meet the purpose and need and does not allow for any growth or future development.

As shown in the map below, it is not prudent for the observation post to remain in situ as its location presents significant conflicts with FAA safety standards and apron operations as well as impede haul-out operations at the ramp transition point.



6.2.2 Adjust Location of Haul Out Ramp

Moving the haulout ramp would not be prudent for the following factors (from Table 2).

- Factor B: This alternative results in unacceptable safety and operational problems as it would place the haulout ramp at increased vulnerability to wave action and make operations less safe during high winds or waves.

6.3 Mitigation Alternatives

6.3.1 Relocate Observation Post

This alternative is not feasible because it cannot be successfully executed using sound engineering judgement. Further, this alternative is not prudent for the following factors (from Table 2).

- Factor G: This alternative would require extensive condition studies, strengthening, shoring and restoration work estimated to $350,000 to $500,000.

6.3.2 Rehabilitation of Existing Similar Structure on Japonski Island

Rehabilitation of the similar structure is both prudent and feasible.

6.3.3 Replicate Observation Post

Replication of the observation is both prudent and feasible resulting.

6.4 Least Overall Harm

Per 23 CFR 774.3, if there are no feasible and prudent alternatives that avoid the Section 4(f) property, then the Administration may approve, from among the remaining alternatives that use the Section 4(f) property, only the alternative that causes the least overall harm to the Section 4(f) property. The factors to be considered for an analysis of harm relative to a Section 4(f) property are defined in 23 CFR 774.3 (c)(1). Given that the Proposed Action is the only alternative that is feasible and prudent to construct, a least overall harm analysis was not conducted for this Section 4(f) Evaluation.

The FAA has determined that Proposed Action causes the least overall harm given that the Proposed Action is the only alternative that is feasible and prudent to construct, is the only alternative that meets the purpose and need of the project and does not substantially increase costs. In addition, the adverse impacts to the site will be been mitigated per a NHPA Section 106 MOA.

7.0 ALL POSSIBLE PLANNING

Per 23 CFR 774.3, Section 4(f) requires all possible planning to minimize harm and requires documentation of measures taken to minimize harm and concurrence of the officials having jurisdiction over the Section 4(f) property regarding these measures. The measures taken to minimize harm and mitigate impacts will be determined once alternatives detailed in Section 5.2 are thoroughly evaluated. One measure have been identified thus far:

- Development of a Memorandum of Agreement (MOA) in consultation with the officials with jurisdiction over the Section 4(f) property (SHPO, NPS) and the SHPC to identify appropriate measures and responsible parties to mitigate the adverse effects. The current MOA was signed.

8.0 CONCLUSION AND FINDINGS

Analysis is ongoing in conjunction with the Section 106 consultation process, particularly related to developing details related to replication. Section 4(f) states that the Secretary may approve a transportation program or project requiring the use of publicly owned land of a park, recreational area, or wildlife and waterfowl refuge of national, state, or local significance or land of a historic site of national, state, or local significance as determined by the official having jurisdiction over those resources only if:

- there is no prudent and feasible alternative that would avoid using those resources; and
- the program or project includes all possible planning to minimize harm resulting from the use.

9.0 RECORD OF COORDINATION

Table 4 lists efforts conducted in support of this Section 4(f) Evaluation. Appendix D contains copies of meeting correspondence.

Table 4: Record of Coordination Relative to the Section 4(f) Property

Date	Activity	Description	Meeting /Email/ Notes in Appendix C
October 15, 2020	Consultation Meeting	Meeting between FAA, CBS, SHPO, and NPS to discuss the potential for effects on the NHL and the site visit to evaluate the observation post.	yes
December 17, 2020	Submittal of DOE/Findings	Draft DOE and draft finding of adverse effects submitted to SHPO and NPS.	N/A
January 29, 2021	Submittal of Revised DOE/Findings	Revised DOE and finding of adverse effects submitted to SHPO and NPS.	N/A
February 10, 2021	Sitka Historic Preservation Commission Meeting	Project information was presented to the Sitka Historic Preservation Commission and the project team received comments on adverse effects and potential mitigation measures.	yes
April 16, 2021	Consultation Meeting	Meeting between FAA, CBS, SHPO, NPS, and STA to discuss adverse effects and potential mitigation.	yes
August 16, 2021	MOA Meeting	MOA Review	yes
2024	MOA	MOA and appendices in progress	N/A
January 2025	Draft Section 4f Evaluation Memo	Emailed Draft Section 4f Evaluation Memo to NPS, SHPO, ACHP. Comments received from NPS and SHPO	yes
July 21, 2025	MOA Meeting	MOA Review – Discussion of Avoidance, Minimization and Mitigation	yes
September 4, 2025	MOA Meeting	MOA Review – Discussion of Mitigation	yes
October 7, 2025	Sitka Historic Preservation Commission	MOA Review – Discussion of Mitigation	yes
November 17, 2025	MOA Meeting	MOA Review – Finalize Mitigation	yes

Completion of the Section 106 process is anticipated December 2025 once signatories execute the MOA and it is filed with Advisory Council on Historic Preservation.

10.0 REFERENCES

DOWL. 2016. Updated Siting Analysis; Sitka Seaplane Base. Prepared for City and Borough of Sitka. November 2016

DOWL HKM (DOWL). 2012. Siting Analysis; Sitka Seaplane Base. Prepared for City and Borough of Sitka. June 2012.

HDR. 2002. Sitka Seaplane Base Master Plan. Prepared for City & Borough of Sitka. HDR Alaska, Inc. August 2002.

Pollnow, Anne. 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. Sitka, Alaska.

U.S. War Department. 1940. Engineer Field Manual: Field Fortifications. U.S. Government Printing Office, Washington, D.C.

APPENDIX A:

PROPOSED ACTION FIGURES

Preliminary Project Footprint

N

Feet
0 500 1,000

Location & Vicinity Map

Sitka Seaplane Base
Environmental Assessment Reevaluation

Figure 1 | November 2024

Q:\23\63021-01\60GIS\Carto\ENV\EA-Reevaluation\63021 EA Reeval.aprx Nov 14, 2024 2:54 PM User: ssterling

Service Layer Credits: World Imagery: Maxar

Marine Project Components

Upland Project Components

Upland Base Parking Area and Approach Elements:
- *Aircraft tie-down*
- *Fire Truck Access*
- *Maneuvering room*
- *Restroom*

N

0 100 200 Feet

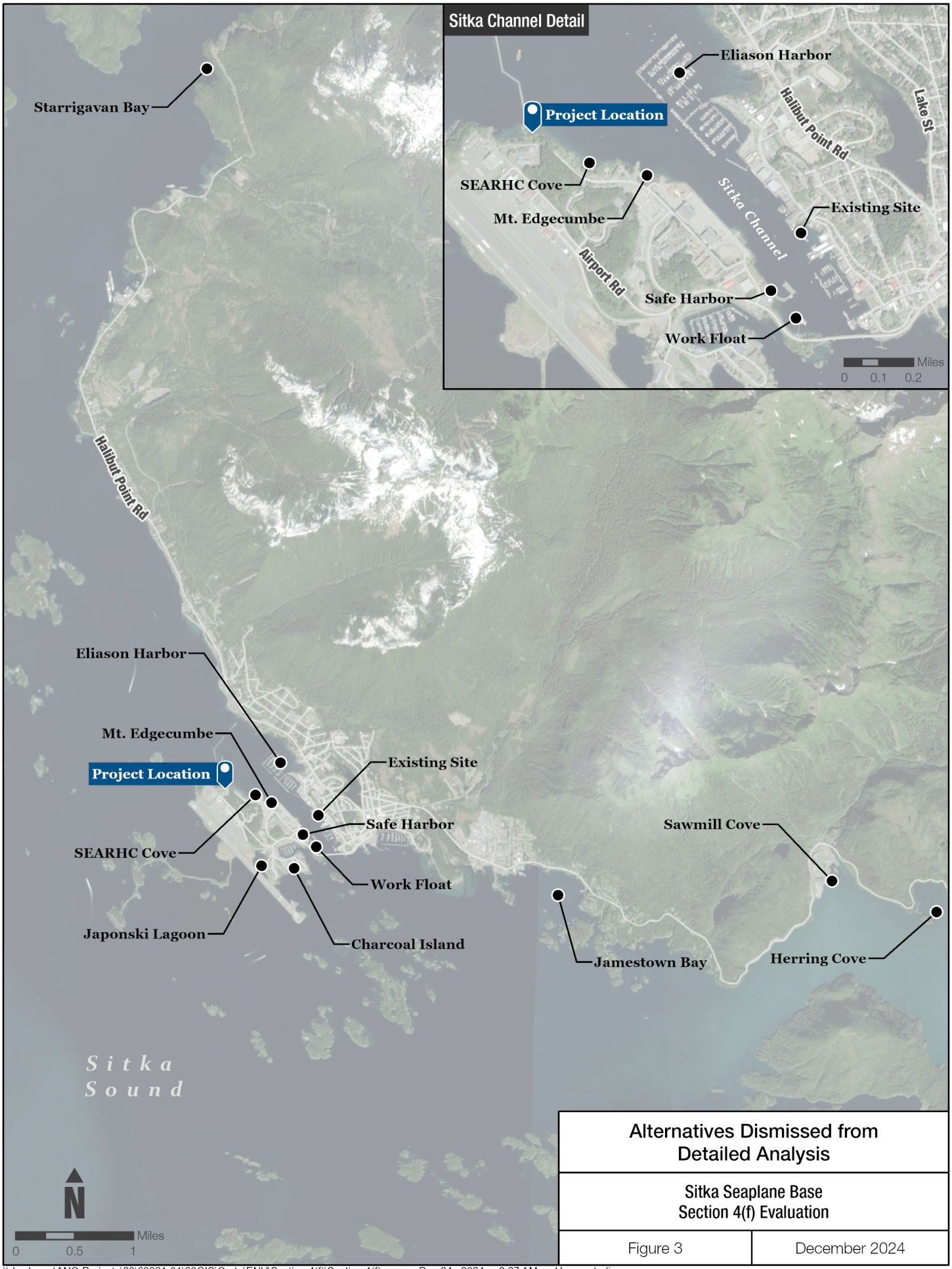
Current Proposed Action
Full Buildout

Sitka Seaplane Base
Environmental Assessment Reevaluation

Figure 2 | November 2024

Q:\23\63021-01\60GIS\Carto\ENV\EA-Reevaluation\63021 EA Reeval.aprx Nov 20, 2024 10:16 AM User: ssterling

Service Layer Credits: World Imagery: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Alternatives Dismissed from Detailed Analysis

Sitka Seaplane Base
Section 4(f) Evaluation

Figure 3 | December 2024

\\dowl.com\ANC-Projects\23\63021-01\60GIS\Carto\ENV\Section 4(f)\Section 4(f).aprx Dec 24, 2024 8:27 AM User: ssterling

Service Layer Credits: World Imagery: Earthstar Geographics
World Imagery: Maxar

APPENDIX B:

OBSERVATION POST ENGINEERING ANALYSIS

DOWL

MEMORANDUM

TO:	Joseph Bea (City and Borough of Sitka) Jenny Liljedahl (PTS)
FROM:	Aaron Christie, PE, PMP
DATE:	August 28, 2025
SUBJECT:	Sitka Seaplane Base – Observation Post Engineering Analysis

Introduction

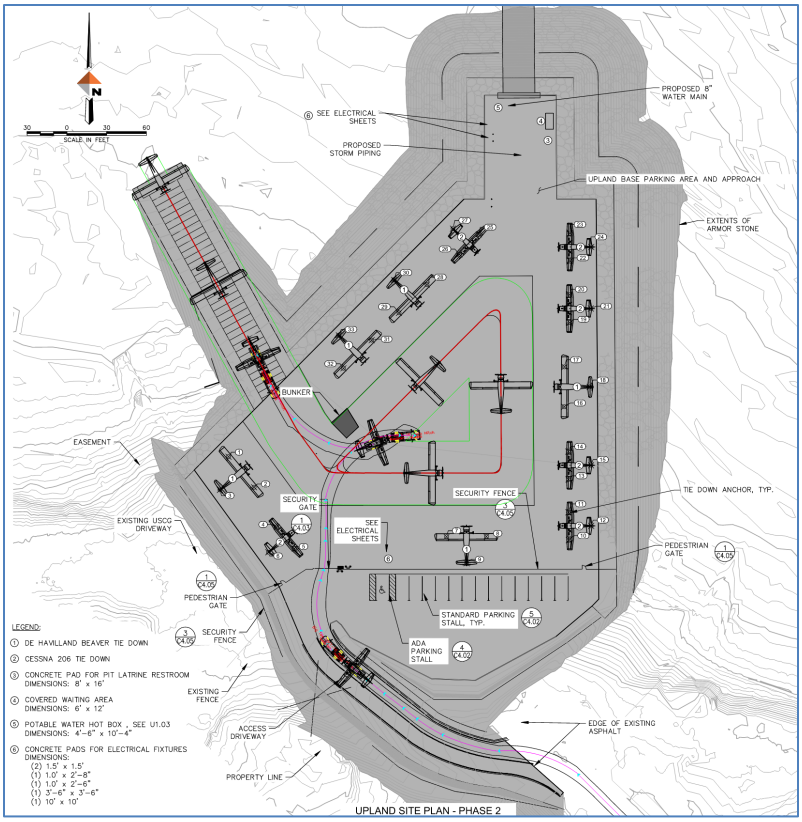
An engineering assessment was conducted to evaluate the feasibility of retaining, modifying, or relocating the WWII observation post (SIT-00115) in connection with the proposed Sitka Seaplane Base improvements. This memorandum summarizes both the structural condition of the observation post and the operational and aviation safety considerations associated with its current location. The intent is to provide technical backup for the Section 4(f) analysis of alternatives.

Alternative 1: In-Situ Retention of Observation Post

Aviation and Operational Considerations

There are four considerations based on FAA advisory circulars (AC) that apply to the SPB and are relevant to the observation post.

1. The bunker lies within the wingspan envelope for the critical design aircraft, the De Havilland Beaver, when maneuvering on the service apron. Section 4.2.4.3 of AC 150/5395-1B provides that: *"The designer can consult Chapter 4 of AC 150/5300-13, Airport Design, for information on determining wingtip clearance for taxiing aircraft as a starting point for establishing wingtip clearance requirements."*
2. Section 4.5.3.1.6 of AC 150/5300-13B further requires: *"The TSA is free of objects, except for objects that need to be in the TSA because of their function."* The required wingtip clearance for the De Havilland Beaver is 15 feet based on its Taxiway Design Group (TDG). The observation post does not meet these requirements, as it is neither "fixed-by-function" nor frangible.
3. Section 4.2.4.3 of AC 150/5395-1B states: *"Because ramps are the transition point from water to land, the ramp site should offer a minimum 200 feet (60 m) of unobstructed turning diameter directly offshore from the ramp in the direction from which approaches are normally made."* The bunker is located approximately 50 feet from the transition point, directly in the area where towing vehicles must maneuver seaplanes on trailers. In practice, a truck towing an aircraft would need to occupy apron space currently constrained by the bunker in order to align with tie-downs or the haul-out ramp. Furthermore, when towing aircraft, potential conflicts extend beyond wingtips; aircraft with wide floats or wing bracing could strike objects even below wing height. Wingtip height also varies by aircraft model and configuration, meaning clearance is not uniform. See below figure for turning movement modeling.



4. Public access to the current location be restricted while the apron is active or the SPB operational unless strict separation criteria could be met. FAA Advisory Circular (AC) 150/5395-1B *Seaplane Bases* states that "*every effort should be made*" to locate all public access points such that they do not require crossing the service apron or tie-down areas. Section 5.2.1 of this guidance further specifies: *"For safety and convenience of the public, they should be separated from other incidental activities on the site, either by adequate buffer space, fencing, or both."* To preserve the observation post in place, the site would need to be separated from the service apron with fencing and buffer space to provide safe pedestrian circulation. This would significantly reduce accessibility.

Moving the haul out ramp would adjust to shift the configuration of the apron was evaluated to determine if avoidance of the constraints identified in the previous considerations would be possible. The ramp is configured to align into the wave exposure from the west, northwest directions and its location is constrained by existing topographic conditions and is placed inside an existing bedrock knoll in the intertidal zone to afford better protection as west. Moving the alignment or position of the haulout ramp would make it susceptible to adverse wind and wave conditions.

Aviation and Operational Conclusions

It is not feasible or prudent for the observation post to remain in situ as its location presents significant conflicts with FAA standards and apron operations as well as impede haul-out operations at the ramp transition point.

Structural Considerations

The observation post is a small cast-in-place concrete structure with walls measuring approximately 18-inches thick. The walls range in thickness from approximately 12" to 20". The

interior dimensions are irregular due to the observation slit and measure roughly 8.667ft (104”) by 13.25ft (159”), or 115 square feet.

The roof and floor thickness are unknown and no as-built drawings exist for reference. Site photographs indicate that construction quality was variable, with voids and inclusions visible in the wall surfaces. Portions of the concrete appear to have been placed directly against rock, and remnants of the original formwork are still visible. Steel posts located at the observation slit are heavily corroded and no longer provide structural function.

The structure shows widespread signs of deterioration. The roof exhibits efflorescence staining, suggesting active corrosion of embedded reinforcing steel. The top surface is covered with moss and vegetation, which prevents full inspection and contributes to moisture retention. The interior walls display heavy efflorescence flows, an indication that cracking is allowing water infiltration and accelerated rebar deterioration.

Honeycombing and large concrete voids are evident in the walls, reducing strength and durability. The floor slab is partially covered with debris and its integrity remains unverified. The foundation was not visible in site photographs, though the site conditions suggest the possibility that the structure bears directly on bedrock.

Structural Conclusions

From an engineering perspective, the WWII observation post can technically be stabilized and preserved in place through extensive rehabilitation.

Alternative 2: Relocation of Observation Posts

Engineering Considerations

Relocation of the observation post to a new location near the existing site would require the use of cranes, jacks, temporary shoring, and heavy transportation equipment. The feasibility of relocation also depends on the foundation configuration. If the structure was cast directly on bedrock, which is likely given observed surface conditions, removal of the full foundation would not be practical. In that case, the structure could only be partially relocated by separating the walls and roof from the floor slab. This process would involve saw cutting at the base of the walls, disconnecting the superstructure from the foundation, and then transporting the walls and roof as a unit to a newly constructed foundation. Even with this approach, temporary shoring and strengthening measures would not eliminate the probability of structural failure during lifting and transportation due to the age and condition of the materials in the structure.

Engineering Conclusions

Successful relocation of the observation post has a low probability of success because the observation was built to remain in one place and not designed to withstand transportation forces and the risk of structural failure during moving is high. Additionally, it was constructed to be temporary and not to retain structural integrity for nearly 80 years. Moving the structure would subject it to forces and stresses it was never designed to accommodate, including lifting, bending, and vibration loads not present in its original wartime context. If relocation was an option, extensive condition studies, strengthening, shoring and restoration would still be necessary with an estimated cost of **$350,000 to $500,000.**

Conclusions

Although the observation post can technically be stabilized and preserved in place through extensive rehabilitation, its current location is fundamentally incompatible with FAA design standards and apron operational requirements, therefore retention in-situ is not feasible.

The structure was not designed to withstand transportation forces and even under controlled conditions, the probably of a successful relocation is low due to risk of structural failure resulting

from deteriorated materials of unknown grade and quality. Substantial cost spending on studies, strengthening and temporary support may help reduce the risk of structural failure during transportation but, based on the existing conditions and age of the materials, the probability of a successful relocation would remain low. Therefore, DOWL recommends that it cannot be moved safely or effectively as even under controlled conditions, there remains too large a risk of cracking, spalling, or even catastrophic failure during transport, therefore relocation is not feasible or prudent.

PHOTOS

Figure 1 - Colored Efflorescence on Walls and Roof

Figure 2 – Pockets in Wall Concrete

Figure 3 – Exterior Wall Rock Surface

Figure 4 – Deteriorated Steel Pipe Supports

APPENDIX C:

CONSULTING PARTIES CORRESPONDENCE

Sitka Historic Preservation Commission Meeting Minutes

Project team in attendance: Kendall Campbell (FAA), Joseph Bea (CBS), Jenny Liljedahl (PTS/CBS)

Meeting start: 6:18pm

SPB Presentation start: 7:21pm end: 7:34pm

Questions start: 7:34pm end: 8:33pm

Notes/Questions (project team responses in *italics*):

- Is the alternative bunker identified to be part of the remediation on City land?
    - *Yes. FAA cannot compel City to purchase lands as part of the remediation. CBS is in support of this opportunity.*
    - Are there issues with proximity to the airport?
        - *No. Airport is secure.*
- Has the design expanded? The uplands look bigger.
    - *Yes, FAA has supported a larger uplands area. This meets the pilots needs.*
- How many seaplane pilots fly into Sitka?
    - *There are approximately 10-15 pilots based in Sitka; however, there are over 50 pilots that have been in contact with the project team in support.*
- Building the seaplane base will have a significant positive economic impact. Availability of seaplanes allows for better connections throughout SE Alaska. Flights can be direct to Sitka versus airplanes which fly through Juneau.
    - Demolishing the observation post is losing a part of history but is increasing commerce; it is all a tradeoff.
- NHL did not incorporate this structure which is perceived as an error. This observation post is the last of its kind on these adjacent islands.
    - One member expressed he felt the NHL analysis and designation was rushed and missed many historic sites.
    - The site is not well known or visited by the general public and is hard to find due to overgrowth.
- There was strong support to do more than signage, such as incorporating the other surrounding WWII elements (rockery, trenches, view shed) into a display as well as a replica of the observation post to be removed. This would provide context and the larger historical impact of WWII on the island.
    - *MOA included signage as a mitigation with details of signage to be determined at a later date. This additional guidance will be considered.*

    - *In terms of a replica, FAA must consider mitigation measures that are commensurate with the adverse effect.*
- What is the timeline for response/action by the commission?
    - *Consultation does not have a firm timeline. The MOA must be completed prior to finalizing the Supplemental EA (SEA). FAA and the project is prioritizing consultations in order to complete the environmental process.*
    - *The draft SEA is out for public comment right now. Comment period ends October 13, 2025. An open house will be held tomorrow to discuss and take comment with the public.*

Commission Guidance:

Commission would like to see expanded "signage" more in line with a display that incorporates other surrounding WWII elements to provide the full picture of the historical significance of the area.

Commission is also in support of improving the alternative WWII installation behind the wastewater facility. This would be done in partnership with the expanded signage.

Next steps:

Commission will review the MOA and provide comments by the next commission meeting.

FAA will continue consultation and MOA finalization with the feedback provided here in consideration.

Summary of Second MOA Consultation Meeting
September 4, 2025

I. Recommended Stipulations in MOA Following Meeting Discussion

A. Visual Impacts to SIT-00079:
- Interpretive panel demarcating the transition from the NHL to the new SPB. Themes for the panel to include seaplane history in Sitka and significance to the NHL, the Officer's Housing portion of the NHL, and the role of the Coastal Defense Network.

B. Direct Impacts to SIT-01115:
- HABS/HAER of SIT-01115
- HABS/HAER of similar structure next to wastewater treatment facility on Japonski Island
- Rehabilitation of similar structure to include cleaning, small repairs, minimal vegetative clearing, and development of a walking trail to the structure
- Interpretive panel at the similar structure discussing the Coastal Defense Network.

III. Actions/Updates

A. Draft Supplemental Environmental Assessment (SEA) with MOA included will be distributed.

B. FAA to send update letter to consulting parties with updated MOA and link to SEA.

Meeting Summary Highlights:

- Consultation Recap: FAA provided a summary of consultation history, including the 2020, 2022, and 2024 fieldwork, the 2021 Adverse Effect finding, and 2025 updated finding of Adverse Effect.
- Discussion Focus:
    - Direct impacts to the WWII-era Observation Post and associated gun emplacement (SIT-01115).
    - Potential indirect visual effects on the Sitka National Historic Landmark (SIT-00079).
    - Review of Archaeological Monitoring and the Inadvertent Discovery Plan.
- Key Themes:
    - Preservation in place is preferred but may not be feasible. Technical assessment is underway.
    - Relocation and/or partial salvage are being considered, with concerns around loss of historic context and integrity.
    - Visual impacts are a concern for the NHL.
        - Confirmation that SIT-01115 is not within the NHL boundary and was not included as a contributing property to the NHL in the 2024 nomination update.
        - Options discussed for mitigating visual impacts include vegetative screening and/or signs demarcating the transition from the NHL to the new seaplane base.
    - Broad interest in interpretive signage that integrates WWII history, history of the traditional inhabitants, and indigenous historic and modern use of Japonski Island.

Next Steps and Responsibilities:

1. Feasibility Assessment for Observation Post Preservation in-place or Relocation
    - Evaluate whether full or partial in-place preservation is feasible, considering safety, grading, and operational constraints.

- Assess constructability and risks associated with relocation within the project site.
- Consider concerns raised regarding preservation in place contributing to additional tourist traffic.
- Assess possibilities for complete or partial relocation to another location with increased public access (e.g., downtown Sitka).

2. MOA Draft Revision
    - Revise MOA to reflect current project status, updated alternatives, and mitigation options.
    - Integrate updates to Inadvertent Discovery and Monitoring Plans.
    - Coordinate language changes based on current consultation outcomes.
3. Consideration of Mitigation Measures (Signage, Interpretation, Potential Rehabilitation)
    - Identify locations and themes for interpretive signage.
        - Potential for two locations, one at the transition between the NHL and the New SPB and a second if needed in an existing tourist location (e.g., the NHL or downtown Sitka).
    - Draft conceptual language and panel content (Themes may include WWII history, Sitka seaplane history, WWII coastal defense systems, and Traditional land use past and present).
    - Explore possible conservation strategies of similar WWII costal defense structures.
    - Explore re-use or interactive interpretation display in a tourist friendly location.
4. Tribal and Historic Preservation Coordination
    - Solicit input from the Sitka Tribe Council regarding interpretive content and location.
    - Coordinate with Sitka Historic Preservation Commission on site stewardship and long-term visibility of interpretative displays or signage.
5. Scheduling and Communication

- Distribute meeting notes and action item summaries to all consulting parties.
- Confirm dates for the next consultation meeting (anticipated early August) following technical review.
- Ensure input from parties unable to attend (e.g., Trish Neal, Anne Pollnow) is incorporated.

6. Preparation for Public Review
    - Align final draft MOA and supporting documents with the Supplemental EA public review period.
    - Confirm readiness for coordinated release and public engagement.

For detailed meeting notes, please contact Emily Corley, ecorley@dowl.com.

From:	Clemens, Janet F
To:	Meitl, Sarah J (DNR); Emily Creely
Cc:	EXT-Jenny Liljedahl; kristi.m.ponozzo@faa.gov; Emily Corley; kendall.d.campbell
Subject:	[EXT] Re: Sitka Seaplane Base - Section 4(f) Evaluation
Date:	Wednesday, February 26, 2025 10:33:48 AM
Attachments:	Sitka NOB and Coastal Defenses NHL update_SecFinal_2024-09-02.pdf

Hello,

To provide clarification about the Sitka Naval Operating Base and U.S. Army Coastal Defenses National Historic Landmark (NHL), both the original nomination as well as the update (which as officially approved 9/2/2024), do not include the observation post.

fyi, the attached official NHL nomination includes the NHL boundary with the listed contributing and non-contributing properties (page 54 of the pdf).

Thank you,

Janet

Janet Clemens, Regional Historian
National Park Service
Interior Region 11- Alaska
240 W. 5th Avenue
Anchorage, AK 99501
Office/voicemail: 907-644-3461

From: Meitl, Sarah J (DNR) <sarah.meitl@alaska.gov>
Sent: Friday, February 21, 2025 4:54 PM
To: Emily Creely <ecreely@dowl.com>; Clemens, Janet F <Janet_Clemens@nps.gov>
Cc: EXT-Jenny Liljedahl <Jennyliljedahl@ptsincalaska.com>; kristi.m.ponozzo@faa.gov <Kristi.M.Ponozzo@faa.gov>; Emily Corley <ecorley@dowl.com>; Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>; Meitl, Sarah J (DNR) <sarah.meitl@alaska.gov>
Subject: [EXTERNAL] RE: Sitka Seaplane Base - Section 4(f) Evaluation

3130-1R FAA / 2019-01376

Good afternoon,

The Alaska State Historic Preservation Office (AK SHPO) received the Section 4(f) analysis for the subject project on January 6, 2024. Following our review of the documentation provided,

we offer the following comments.

We appreciate the opportunity to review the Section 4(f) analysis for the project, but we believe that it will need to be amended in the future to account for the pending determinations of eligibility for listing in the National Register of Historic Places (NRHP) for SIT-01124 and the current seaplane base, as well as a revised assessment of effect if one or both properties are determined eligible for listing in the NRHP. In addition, we recommend reframing the discussion about effects to the National Historic Landmark (NHL). While some of the design changes can minimize effects to other portions of the NHL in regards to auditory and visual effects, demolition of the observation post (SIT-01115) will still adversely affect the NHL since it is a contributing property to the NHL. In addition, we believe the analysis is hindered in regards to understanding whether there is reasonable mitigation sufficient to offset the project's impacts to historic properties since we have not completed consultation regarding the treatment measures.

Thank you for the opportunity to comment. Please contact me if you have any questions or if we can be of further assistance.

Best,
Sarah

Sarah Meitl
Review and Compliance Coordinator
Alaska State Historic Preservation Office
Office of History and Archaeology
907-269-8720

From: Emily Creely <ecreely@dowl.com>
Sent: Friday, January 3, 2025 1:54 PM
To: sstokely@achp.gov; Janet_Clemens@nps.gov; Meitl, Sarah J (DNR) <sarah.meitl@alaska.gov>
Cc: EXT-Jenny Liljedahl <Jennyliljedahl@ptsincalaska.com>; kristi.m.ponozzo@faa.gov; Emily Corley <ecorley@dowl.com>
Subject: Sitka Seaplane Base - Section 4(f) Evaluation

All,

On behalf of the Federal Aviation Administration (FAA) and the City and Borough of Sitka (CBS), DOWL has developed an evaluation of the proposed new Sitka Seaplane Base on historic sites per Section 4(f) of the U.S. DOT Act of 1966 (49 USC 303). The report can be found at:
https://www.cityofsitka.com/media/Airport/Section%204f_Updated%202025.pdf

Section 4(f) provides that the Secretary of Transportation may approve a transportation program or project requiring the use of historic sites of national, State, or local significance, only if there is no feasible and prudent alternative to the using that land and the program or project includes all possible planning to minimize harm resulting from the use. The FAA must solicit and consider comments from the appropriate official(s) with jurisdiction over the Section 4(f) property, and per FAA guidance, the officials with jurisdiction are the State Historic Preservation Office, Advisory Council on Historic Preservation, and National Park Service.

The FAA and CBS have determined that there are no feasible or prudent alternatives that avoid using or adversely affecting the Section 4(f) property. With the exception of the Proposed Action, all alternatives were determined to be infeasible and not to be prudent due to a number of factors.

The Section 4(f) evaluation will also be included in the project Supplemental Environmental Assessment, anticipated to be completed in Summer 2025 and will be referenced in continuing consultation occurring under Section 106 of the National Historic Preservation Act.

Please respond before February 18th with any comments, questions or feedback.

Thank you,
Emily

Emily Creely, PWS
Environmental
Specialist

DOWL

(907) 562-2000 | office
(907) 865-1216 | direct

dowl.com

City and Borough of Sitka

100 Lincoln Street • Sitka, Alaska 99835

Coast Guard City, USA

SITKA HISTORIC PRESERVATION COMMISSION
Regular Monthly Meeting
Harrigan Centennial Hall
February 10, 2021 6 p.m.

DRAFT MINUTES

I. CALL TO ORDER & ROLL CALL

Chair Littlefield called the meeting to order at 6:04 PM.
Present: Roby Littlefield (chair), James Poulson, Ana Dittmar, Scott Saline, Chuck Miller, Crystal Duncan (assembly liaison)
Absent: Bob Sam
Staff: Amy Ainslie, Ben Mejia
Public: Rebecca Poulson, Kelli Cropper, Maryellen Tuttell, Ken Nichols, Katie Kennedy, Jake Anders

II. APPROVAL OF AGENDA

M-Poulson/S-Dittmar moved to approve the agenda. Motion passed 5-0 by voice vote.

III. APPROVAL OF MINUTES

A. December 9, 2020 minutes

M-Dittmar/S-Miller moved to approve the December 9, 2020 minutes. Motion passed 5-0 by voice vote.

IV. GUESTS &/OR PERSONS TO BE HEARD

V. REPORTS & CORRESPONDENCE

Ainslie informed the Commission of virtual Commissioner training hosted by the Clerk and Legal Departments on Friday, February 12th at noon. Ainslie explained that the training would cover Roberts Rules of Order, Open Meetings Act, conflict of interest, and ex-parte communications.

Ainslie informed the Commission that the new state historian with the Office of History and Archaeology (OHA), Katie Ringsmuth, was now the point of contact for Certified Local Government grants. Littlefield read Ringsmuth's email correspondence which announced that the OHA was now accepting Historic Preservation Fund grant applications.

VI. OLD BUSINESS

B. Historic Preservation Plan

Ainslie reported that staff had not yet received comment from Sitka Tribe of Alaska (STA). Miller replied that he would put the item on the next STA cultural resources committee meeting on March 4th.

C. Commissioner Recruitment

Ainslie reported that staff continued to advertise for the vacant at-large seat. The Commission voiced concern over difficulty in filling the vacant seat while previous appointments had been denied by the assembly. Duncan asked the Commission to encourage previous Commission applicants to reapply. Ainslie reviewed expiration dates of current Commissioners.

VII. NEW BUSINESS

D. Review of Sitka Seaplane Base Environmental Assessment

Ainslie introduced the DOWL project team. Maryellen Tuttell provided a site description and project overview for the placement of a seaplane base along Seward Avenue on Japonski Island. Tuttell and Kelli Cropper explained that after site selection studies were conducted, the proposed site was identified as the optimal location and layout to meet seaplane base needs. Tuttell explained the environmental review processes.

Tuttell informed the Commission that review of potential impacts was necessary under Section 106 of the National Historic Preservation Act. The project identified a World War II era observation post located in the center of the site. Tuttell explained that a field survey had been conducted to document the resource and a Determination of Eligibility (DOE) report had been written and submitted to the State Historic Preservation Office (SHPO) and National Park Service (NPS) for review. Tuttell explained that they had been consulting with the NPS due to the proximity of the resource to a National Historic Landmark (NHL) and to plan appropriate mitigation of potential adverse effects.

Jake Anders provided an overview of identified historic resources in the area, associated with the Sitka Naval Operating Base and US Coastal Defenses NHL consisting of WWII era structures. Anders explained that the project included considerations of potential visual impacts as well as vibrations during construction and use. Anders provided additional detail about the observation post, stating that it was characteristic of WWII era military construction, was located near the modern-day coastline, and was well preserved though weathered. Anders explained that the DOE recommendation found that the resource should be considered eligible as a contributing resource of the NHL. Anders stated that if the SHPO and NPS agreed with their findings, DOWL would continue consultation with both parties as well as the city of Sitka to determine mitigation measures.

The Commission discussed potential mitigation strategies. Potential mitigation strategies

discussed were reshaping the site to avoid the observation post and designing a museum exhibit of the WWII site. Cropper and Tuttell explained that due to the grading of the site avoidance of the historic resource was unfeasible. Rebecca Poulson asked if archaeological monitoring would take place during excavation. The Commission discussed the proximity of the project location to areas of tribal significance. Ken Nichols replied that the Federal Aviation Administration provided guidelines on appropriate procedure if artifacts are found. Tuttell continued that consultations with SHPO and NPS would provide additional guidance on cultural resource monitoring during site preparation. Rebecca Poulson asked for estimated project costs. Cropper responded that the rough order of magnitude was approximately $20 million.

VIII. SET NEXT MEETING DATE(S):
(2nd Wednesday of the Month, 6 pm **Harrigan Centennial Hall)**
Wednesday, March 10, 2021 – Regular Monthly Meeting

IX. ADJOURNMENT

Seeing no objections, Chair Littlefield adjourned the meeting at 7:40 pm.

MEETING NOTES

PROJECT:	Sitka Seaplane Base	DATE:	4/16/2021
PROJECT NUMBER:	1123.63021.02	TIME:	3:00 pm
ORGANIZER:	DOWL	SUBJECT:	Section 106 MOA
LOCATION:	Virtual	CONTACT INFORMATION:	

1. Land Acknowledgment – Sitka Tribe of Alaska
    a. Land Acknowledgement from Bob Sam (STA). Bob expressed that the Tribe has deep interest in cultural resources and preservation.
2. Introductions - ALL
    - CBS – Kelli Cropper (Project Manager), Amy Ainslie (Planning Director, liaison to HPC)
    - FAA – Jack Gilbertsen (Lead ENV Protection Specialist for FAA Alaska)
    - STA – Bob Sam, Diana Bob (Tribal attorney for STA)
        - Bob Sam serves on STA Tribal Council. He is active in historic preservation (also serves on Sitka Historic Preservation Commission as Vice Chair, and has been on other committees including the DOD Tribal Steering committee. He is actively involved in cemetery preservation issues in Sitka).
    - SHPO – Sarah Meitl (Review and Compliance Coordinator, Office of History and Archaeology SHPO office)
    - NPS – Janet Clemens (Historian)
    - DOWL – Maryellen Tuttell (Environmental Lead), Jake Anders (Cultural Resource Manager), Caity Kennedy (Cultural Resource Specialist), Ken Nichols (Project Manager)
3. Overview of Section 106 Process for Project – DOWL Jake provided a brief overview of the cultural resource process, concerns expressed to date, determinations of eligibility, etc. The purpose of this consultation meeting is discussion of appropriate mitigation.
    a. DB What is the Tribe's role in this meeting?
        i. DOWL/CBS understood from previous meetings that there were STA concerns raised about the project area.
            1. DB: Are you satisfying consultation requirements or are you talking about NPS here?
                a. JA: The intent of the meeting is to have all consulting parties present to discuss issues raised by consulting parties through the consultation process.
        ii. MET: Bob was at a resource protection meeting with STA. Jeff (last name?) at that meeting had mentioned the need for monitoring on the

site, and that there had been an MOA btw STA and FAA for work at the airport, and that that had been a good model to potentially use. We want to discuss that during this meeting as well.

1. SM: For clarification: today is a Section 106 Meeting to discuss the adverse effects.

iii. DB: Some members of STA tribal council have expressed their view that the consultation and assessment of initial effects isn't complete. Do the CBS and FAA believe you have completed your effects analysis and consultation requirements for that?

1. BS: Just talked to Tribal chair (Woody Woodmark) and talked about the very same concerns. (BS explained that he doesn't speak for the tribe, they have a spokesperson [Woodmark], but BS is here to offer expertise on cultural resources. BS was the STA member who worked with the FAA to work to repatriate human remains located nearby this project [during airport improvements]). This meeting today is groundbreaking in many ways. Charting new territory in relations with not only other agencies but the CBS as well. So today we could discuss inadvertent discoveries and whom to contact, etc. Right from the beginning we should establish who to contact if something is found. I believe in lineal descendants. To contact them is very important in this process. There will be a more formal agreement, so let's move forward with these discussions.
2. KC: The agenda talks about the various issues we want to discuss for the meeting, including avoidance, an inadvertent discovery plan, and then the observation post, so that we can move forward to developing an MOA that is acceptable to all parties.
3. MET: The Draft EA is being modified to address the comments received from the public, the Tribe (from two tribal meetings) and SEARHC, reflecting information that's been brought to the project by the Tribe. Perhaps we should schedule another meeting?
4. SM: Are there concerns about not identifying effects as they relate to cultural resources?

a. DB: People have expressed concerns about the cultural value to the landscapes and the waterways (suggesting TCPs).

5. SM: Can somebody confirm whether finding of effect was also provided to the tribe? JA will confirm.
    a. SM: Finding and supporting documentation of identification efforts, effects, etc. should have been provided to the tribe for review and comment. We shouldn't be getting too far into the discussion of mitigation efforts if the identification effort isn't complete.

4. Memorandum of Agreement – ALL
    a. (?): Part of the purpose for this meeting is to discuss how we (CBS, FAA) ensure that STA is involved. Incorporating cultural/tribal monitoring would provide a direct line to any potential discovery situation when a representative of STA would be on-site during ground-disturbing activities. (A Tribal monitor would) not take the place of paper trail documenting notification compliance protocols, but presence of an STA member would help to ensure connection is made immediately as has been expressed by BS and other tribal members. Have we heard you correctly, are we understanding, are we adequately addressing those concerns?
        i. BS: I immediately caught the "informal" aspect of the discussion. I would like to notify Sitka tribe formally, right away, to work together hand in hand to address inadvertent discoveries. STA is a federally recognized tribe with inherent rights. It is very important to have a formal agreement ensuring working together. Understand how it is now, where they contact SHPO and the state archaeologist. However, lineal descendants have inherent rights that are recognized in federal policy. Eventually the State and tribes will come together to work this out.
            1. JA: Your central point, if I understand: Are you speaking specifically to the agreement for this project or are you talking about something broader (eg relationship between STA and CBS/State?).
                a. BS: Both. This is a road we haven't gone down yet. I don't know of any other tribe that has a formal Government-to-

Government with their city, but definitely CBS does. Also, in the ordnance of Preservation, Section 6 or something; both STA and CBS are working through these issues.

2. KC: What we have been heading towards is a formal notification codified in the MOA, but also to have somebody from the STA on site during the soil disturbance. That puts the STA in a position to be first notified but doesn't take away the formal notification process to be included in the MOA. That's the intent here.
3. SM: I just wanted to put it out there that if this is new for agencies to be reaching out to you about inadvertent discoveries, then that's problematic for SHPO's office. Agencies should be in contact if there are inadvertent discoveries so they can be involved in that consultation. STA should please follow up with SM if there are concerns to be discussed about that.
4. JA Thank you for input there. As the process moves forward and things take shape into agreement documents for the project, please keep these ideas in mind. We want to have protocols and the notification process should be a robust and well-developed process. It serves all well to keep in mind that these issues (inadvertent discoveries) are an important issue to keep front of mind. Bob Sam clearly has a lot of experience addressing these issues on a state and local level, and we appreciate his input here.
5. DB: Will you guys be sending out proposed language for that?
    a. JA: That is certainly open for discussion. It would be developed in consultation such as this. We could start with the language from the 2010 MOA (as something identified by STA that worked for them), to start from that so that STA is involved in reviewing and ensuring that the Project is adequately addressing concerns. The project team is open to other options.
        i. DB: To have something on paper is a good start.
        ii. JA: For other projects that require agreement documents to be drafted, there are usually a series

of draft submittals reviewed by consulting parties. Collaboration is the key to good consultation.

6. KC: We will be going back and forth until we get it right. DOWL is on contract to produce the MOA.

- Potential Impacts on NHL Streetscape
  - JA: Through the process of design and discussions with NPS, changes were made to minimize impacts to the NHL streetscape, including design changes such as lowering the elevation of the base to below grade of the streetscape, and also masking any potential visual impacts through vegetative buffers/screening.
  - KC gave description of how these efforts will likely look. These should really limit the potential visual impact to that cul-de-sac.
  - JC: Just to make sure everybody is on same page, the DOE drawings/renderings are consistent from figures in the DOE, correct? The document should be finalized to the extent possible. I feel like the Project does address issues where the project is adjacent to the landmark, which is a residential (quiet) area. Thank you for considering these issues, and the solution is really adequate.
  - DB: On your vegetation are you using native plants? Do you have a plan for that?
    1. K: We are definitely into native plants, and CBS could seek input from STA on this.
  - SM: Speaking to that, it is appropriate to include specific measures used to minimize effects. We can include a process of consultation if we can't decide on a resolution of effects. We can also discuss specifics (such as vegetation used) if that can be agreed upon by draft/signature of the MOA.
    1. K: I think this is a good direction. As for outcome, it can be either: it can either be an outlined process for having the conversation or a defined decision that happens prior and is included in the MOA. Part of a larger conversation.
  - JA: It is important to keep this in mind when thinking of what the contents of a potential agreement document are. If specific measures can't be

agreed upon for the document, then at least measures for making those decisions should be included.

- JA described various mitigation options brought up by consulting parties and through public comments. Notes from comments on observation post mitigation options.

a. BS: As Vice Chair of the HPC, I think points that were brought up by HPC as regards the observation post, that post is in a category known as Formerly Used Defense Sites (FUDS). Sitka has a large number of these sites, and as far as I know the DOD could reactivate those sites if needed. So, the integrity of that observation post for historic purposes is a valid one. Most of the other sites of that type on that island have been removed. Very few have the integrity that that site has. As member of HPC, working with FUDS, I think it might be a little difficult to get through this one. I understand the mitigation process, so that's going to be a very important part to minimize the effects.
    - KC brought up site plan drawings to show where the observation post is on the Project site. KC: the observation post is about 14-15 feet above sea level (7 ft below grade) which is why it isn't feasible to keep it. As we've been working on this, I've documented another complete observation post behind the wastewater plant, and another incomplete one on other properties. If we could document and at least locate other similar posts to document their locations, we would have information we didn't previously have. The other observation post is right behind the clarifier.
        1. JA: It's a good example of another intact observation post in the vicinity, of which there are few.
        2. KC: All around it there are other concrete works that may have been part of the structure at some point.
    - JA: In terms of historic association with DOD and use as FUDS. We would need to look to see if there is a database of sites similar to this or if it was looped in with others in the Sitka area.
        1. MET: I talked to the USACE FUDS program and they don't have any information on that part of the island. They don't have anything on that corner of Japonski and where the proposed seaplane base will be.

2. SM: It might be worth reaching out to Forrest Cranda (sp?). They've been keeping records. CK responded that she'd been in contact with Forrest during her research for the observation post documentation and he had sent all of the information available.

b. JA: In terms of options: not just HABS HAER, but where are the other military features of these classification on Japonski? Is this something that could feed into NPS documentation for the NHL? Especially since these are not as well documented features. Documentation could be more than just photos and drawings.
    - JC: I agree with drawing in the history and pictures and photographs, and people. Here you have a community of people who are interested in this. This could be more community based or interest. My coworker John Locktail (sp?) provides guidance for that. He already a HABS number for Sitka NHL documentation, so he could look into that to see if this fits in to that. Being well documented to be able to share that information with people; if the community wanted to put it on a sign or on a website? To have somebody to put this together in an interesting/engaging way I would be supportive of.

c. BS This conversation is exactly what the HPC needs to hear. We are very interested in the interpretation of sites. Looks apparent the observation post will be removed. I'm sure there will be opposition to that because of HPC members, but I'm sure this mitigation... I have questions in regards to mitigation or interpretation. Pedestrian access, how can people walk through that whole area and make it pleasing? Pedestrian area and interpretive landscaping, have access to signs or even bike trails. Somehow to make it recreationally pleasing to the public and at the same time leading to the interpretive signs.

d. JA: As we talk about a potential interpretive display sign, what is the appropriate place for the public to consume this information? Perhaps this is what Janet Clemens was alluding to. If you document but don't share… how do we make this available to an interested public who are interested?

e. (?) How safe is that bunker to leave it where it is? There was a comment of young people, if it stayed were it is, could it still be a dangerous place?
    - JA: In terms of structural integrity and safety, we don't know. If we make it accessible to the public (say, highlight the wastewater treatment plant

etc.), if you attract people to that resource is there a potential issue of safety? It's a valid concern.

f. SM: In speaking about some of the public interpretation and what we could be doing or doing things like stationary display. Many people go to Sitka for Heritage tourism. Using the information gathered and could be gathered to encourage heritage tourism. Doing something, whether it's a walking tour, or putting something on a website with a map, that could be an option.
    - JA: Incorporating whatever the product is into heritage tourism could be a win-win for everybody.
    - KC: I think Rebeca P at Maritime Museum, that's kind of what they're working on. I think they have some of that heritage-type stuff planned. She suggested an outdoor documentation somewhere on the grounds (interpretive display) outside the Maritime Museum. Since the museum isn't open if this were outside it could still be on display.

- JA: Before we adjourn, what are the next steps? There may be some work that needs to be done in terms of the identification process. There needs to be discussion with STA in terms of the identification portion of the Section 106 process that needs to be further discussed. If everyone agrees at this point that it's appropriate, recognizing that identification work is ongoing with the STA, trying to incorporate aspects of conversation today with STA in primary role of notification and on the ground notification. Make sure minimization measures are included that we include in the MOA (whether inclusion as stipulation or as process). Is this appropriate to move to, trying to tailor portions of it?
    a. SM: Given that we have some identification concerns I think that this is putting cart in front of horse. I think that if we put efforts towards the inadvertent discovery plan the resources might get left behind. If efforts are focused on identification, that will be a quicker more efficient process.
    b. JA: If all are in agreement that that's the primary drive for the Section 106 process, we can pick up this process once again once STA is comfortable with moving forward on the consultation process.
        - SM: a good way to move forward is not only to do more consult with STA but to define a good faith effort and execute it.
- JA: Thank you for a productive and robust discussion on the project and historic preservation in Sitka in general. Thank you.

a. BS: Thank you for this very important discussion. It's unprecedented and new for all of us. Consultation for me is working out all of these MOUs and MOAs and talking and discussing things out. It's really a very pleasurable thing to do when we know each other and come to agreement; we'll find that there's a lot of common interests that we share on this project. I look forward to working with you more, and looking forward to consultation, and yes this is very informal today, but we made a very big step just getting to know each other, so thank you.

TASK ASSIGNMENTS:	ASSIGNED TO:	DUE BY:
◆		
◆		
◆		
◆		

MEETING SUMMARY

PROJECT:	Sitka Seaplane Base	DATE:	8/16/2021
PROJECT NUMBER:	1123.63021.02	TIME:	2:00 pm
ORGANIZER:	Jake Anders, DOWL	SUBJECT:	Section 106 MOA

ATTENDEES:	ORGANIZATION:
Kelli Cropper	City and Borough of Sitka
Ben Mejia	City and Borough of Sitka
Jack Gilbertsen	Federal Aviation Administration
Rodney Clark	Federal Aviation Administration
Janet Clemens	National Park Service
Jeff Feldpausch	Sitka Tribe of Alaska
Sarah Meitl	State Historic Preservation Office
Jake Anders	DOWL
Caity Kennedy	DOWL
Emily Creely	DOWL
Maryellen Tuttle	DOWL
Ken Nichols	DOWL

- Introductions
- Memorandum of Agreement
    - Review earlier discussion on basing current MOA on 2010 MOA from Airport Project
        - 2010 MOA is not being used verbatim for this project, but is providing starting points for specific components which were effective and well-received by consulting parties for that Project (e.g., notifications, monitoring).
    - Review and Discuss DRAFT MOA Preamble
        - SHPO and NPS provided important clarifications on the contents of the preamble and the role of specific consulting parties
        - DOWL will distribute an updated Preamble in track changes to consulting parties for their further review and feedback.
- Potential Impacts on NHL Streetscape
    - Screening Landscape Buffer/Site Elevation

- MOA will contain the *process* for how the final plans will be developed and approved amongst consulting parties (e.g., what vegetation type).

- Observation Post Minimization/Mitigation Discussion
  - Observation Post avoidance or minimization is not feasible
- Observation Post Mitigation Discussion
  - HABS/HAER Documentation Methods
    - Different degrees of documentation that can be applied
    - NPS HABS/HAER staff can provide more details (John Watchtel, Historic Architect)
  - Interpretive Display/Signage
    - Options should try to integrate local preservation planning to the extent practicable (e.g., existing walking tours)
  - Financial Support to any entity as a stand-alone mitigation strategy is unlikely to be an appropriate mitigation option, nor allowed by FAA's funding mechanism.
  - Other mitigation ideas discussed:
    - Report or Pamphlet
    - Identification/interpretation of other known observation posts on Japonski Island.
  - Construction Monitoring and Inadvertent Discovery Plan
    - Archaeologist and Tribal Monitor on site during soil disturbance
      - FAA is not requiring this, but does not oppose this approach
    - Human remains Discovery Contacts
      - Per state law, initial contact must be with the State Medical Examiner's Office and law enforcement to make a determination whether the discovery is of a forensic or archaeological/historic nature.
        - If archaeological/historic, flexibility to prioritize tribal notification as an immediate contact.
  - Next Steps:
    - First Draft of MOA Stipulations will be prepared based on meeting discussion, and will contain headings for mitigation options discussed.

MEETING NOTES

PROJECT:	Sitka Seaplane Base EA	DATE:	10/15/20
PROJECT NUMBER:	1123.63021.01	TIME:	
ORGANIZER:		SUBJECT:	Historic Resources
LOCATION:	Skype (virtual)	CONTACT INFORMATION:	

ATTENDEES, ORGANIZATION:

Venus Larson, FAA Jonathan Linquist, FAA Janet Clemens, NPS Kelli Cropper, CBS Sarah Meitl, DNR	Mckenzie Johnson, DNR Maryellen Tuttell, DOWL Ken Nichols, DOWL Lucy O'Quinn, DOWL Caity Kennedy, DOWL

Safety Moment Remember to be COVID-aware. UAA ECHO Science series every Wednesday at noon with a number of public health specialists.

Sitka Seaplane Base EA Status

Concept Site Design
Historic Resources Evaluation

DOWL noted the SPB Planning Level Concept was developed as part of this project and has changed from the Facility Diagram used in the scoping meetings, which was developed in the prior Siting Studies. The changes are due to the actual physical properties of the proposed site upland and submerged lands. The site development requires excavation/grading to level and lower site and the addition of fill into shoreline area. Access road now goes down into site; site at lower elevation than cul de sac. This accomplished through the removal (excavation) of the hillside on the west side of the cul de sac, which will become a sloping road heading down into the site from the Seward Ave cul de sac. This will require some blasting to remove material.

DOWL cultural resource expert did site visit and documented conditions of bunker/outlook post.

EA Issues to Discuss

Area of Potential Effect FAA proposed APE based on perimeter of site assuming full site development. DNR noted that there are sites on USCG base that are not shown within the proposed APE. Team discussed the elevation change between existing site and USCG. Team will update APE to better represent the topographic conditions at the project site.

NEPA Historic Site Impacts
Bunker/Observation Point
NHL
Section 4(f)

Discussion of existing uses of areas within NHL and proposed uses. Seaplanes currently use Sitka Channel and will continue to do so, but use may be shifted somewhat to the north on the channel. FAA normally doesn't require noise analysis for this level of general aviation aircraft operations, as noise contours typically stay on airport. This is different due to use of channel vs. airport runway. Team is looking at doing noise modeling to evaluate change in noise level from

aircraft operations at sites along Seward Avenue. Traffic discussed. Team has done qualitative evaluation of traffic based on information from potential SPB users. Note that although area was historically primarily residential, now only one residence, other former residences used as day clinics with vehicle traffic generated throughout day. CBS noted past concern expressed about vehicles towing aircraft through the area. Any aircraft towed through the area would have to have wings removed to travel on public street; not likely to occur.

Section 106 Historic Site Findings

Bunker/Observation Point

NHL

NPS has updated the 1986 nomination of the NHL to new document standards. Rather than expanding the boundary, the new work shrank it a little. The Bunker in the APE has an obvious association with the NHL and coastal defenses. The question remains of what the bunker can add to the story and the integrity of the structure. At this point, all available material has been reviewed and local historians interviewed to capture information. The DOE will reference all of this, but at this time we are unable to answer the research questions of: what was being observed? Ships? Aircraft? What kind of guns? How did it play a role in the ring of protection? The bunker is unlike others on the base. Therefore, association is concurrent to the historical period of significance, but without clear association. The missing connection is context – the bunker was here for a reason that we have not ascertained.

Next Steps

Determination of Eligibility

Discussion about whether the bunker should be individually evaluated or as a contributing element to the NHL. McKenzie recommends we go with contributing. Given all that we do not know, the DOE should demonstrate how research was carried out, a comparison to similar property types, and a discussion of Sitka-area bunkers even if the purpose of this particular bunker can't be determined.

Further consultation on Section 106 Findings

Update the APE to describe how the buildings to the SW are not impacted doe to elevation change, vegetation, etc.

TASK ASSIGNMENTS:	ASSIGNED TO:	DUE BY:
◆ Janet sends additional reference		Done
◆ Clarify APE & justification	DOWL	Nov 6
◆ Complete DOE for bunker	DOWL	Nov 6
◆ Note AHRS sites on USCG base	DOWL	Nov 6
◆ Any info on other bunkers on the island	DOWL	Nov 6
◆		
◆		
◆		