

APPENDIX F:

SECTION 4(F) EVALUATION

From: [Clemens, Janet F](#)
To: [Meitl, Sarah J \(DNR\)](#); [Emily Creely](#)
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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](#)

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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

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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

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From: Emily Creely <ecreely@dowl.com>

Sent: Friday, January 3, 2025 1:54 PM

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Subject: Sitka Seaplane Base - Section 4(f) Evaluation

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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
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SECTION 4(F) EVALUATION

Sitka Seaplane Base

Sitka, Alaska

Prepared for:

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July 2025

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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

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 seaplane 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 seaplane base. 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 FAA's 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:

1. there is no prudent and feasible alternative to using that land
2. 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

The proposed action will occur within the boundaries of lands currently owned by the City and Borough of Sitka (CBS), the existing Seaplane Base (SPB) and the proposed location for a new SPB. The new SPB

would replace the existing and deteriorating SPB that has been in operation for 65 years and is at the end of its useful life.

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 new Seaplane Base.

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 U.S. Army Coastal Defenses NHL

Designated in 1986 for its role in World War II (WWII) defenses in Alaska and the Aleutian Islands, the NHL is comprised of Sitka NOB and Fort Rousseau, including associated U.S. Army Coastal Defenses on eight islands. The Sitka NOB was originally established as an advance seaplane base in 1937 and was designated a NOB in 1942. During WWII planes operating out of the Sitka NOB patrolled Southeast Alaska and the Gulf of Alaska. Sitka NOB also provided critical defense for shipping in the Gulf of Alaska. Beginning in 1941, the U.S. Army established Forts Ray, Rousseau (which replaced Fort Ray as the headquarters for coastal defense in 1943), Pierce, and Babcock to provide defensive support to the Sitka NOB. As part of this effort the Army also constructed the Coastal Defense Network, a system of armaments and fortifications to protect Sitka Sound and associated Naval facilities. Sitka NOB was closed by the Navy in 1944 (Bush 1944; NPS 2020). In 2024, NPS updated the 1986 nomination to account for changes to the NHL, including demolition or rehabilitation of buildings, and improved documentation of contributing features (NPS 2024).

The 1986 nomination had 78 contributing features, and although there have been safety and efficiency improvements and changes in use, these retain the character of their period of significance. The NPS has established a boundary for the portion of the NHL adjacent to the Project site that encompasses a number of facilities (both contributing and not contributing to the NHL) that were used on Japonski Island during WWII (Figure 1; Appendix A). The current NHL boundary ends at the south end of the proposed project site.

3.2 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. 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).

DOWL prepared a draft DOE and recommended the observation post (AHRS SIT-01115) located on the project site as eligible for the NRHP under Criterion A for its association with coastal defense of Alaska during WWII. Furthermore, the DOE recommended that the observation post (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.

A gun emplacement was recorded by Pollnow during archaeological monitoring of geotechnical activities in 2022. In 2025 the gun emplacement was incorporated into SIT-01115 for its likely association with operation of the observation post.

Although the ruins of several concrete structures are extant in the Sitka NOB and U.S. Army Coastal Defenses NHL, this building is 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 the observation post was eligible for inclusion in the NRHP in March 2021.

3.3 Other Potentially Eligible Properties

During fieldwork completed in 2024 (DOWL) and field monitoring completed in 2022 (Pollnow) during geotechnical exploration, nine other features were identified and recorded as SIT-01124:

1. Raised Circular Feature (2022)
2. Rockery Wall (2022)
3. Rectangle Depression (2024)
4. Stacked L-Shaped Wall (2024)
5. Circular Pit with Log Covering (2024)
6. Square Depression (2024)
7. Privy Pit (2024)
8. Connecting Trenchworks (2024)

Following the field investigation, DOWL evaluated the eligibility of SIT-01124 for listing in the National Register of Historic Places. DOWL’s analysis recommended that SIT-01124 is not significant under any Criteria A through D. Based on the analysis, DOWL recommended that SIT-01124 is not eligible for listing in the NRHP.

Additionally, DOWL evaluated the eligibility of the existing Seaplane Base across Sitka Channel on Baranof Island (assigned AHRS number SIT-01172). DOWL’s analysis recommended that SIT-01172 is not significant under any Criteria A through D and recommended that SIT-01172 is not eligible for listing in the NRHP.

4.0 IMPACTS TO THE SECTION 4(F) PROPERTY

The proposed Sitka Seaplane Base project would require 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 FEASIBLE AND PRUDENT ALTERNATIVES

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.

5.1 Alternatives Considered and Dismissed

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 1 as defined in 23 CFR 774.17.

Table 1: 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?

5.1.1 Sites Not Developed into Alternatives

Two areas were not considered for any alternatives due to 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 seaplane base facilities and normal seaplane operations. This limits the potential for seaplane base development to only a few locations that have adequate protection. These are included in Table 2.
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 Alternative Locations

CBS completed three siting studies between 2002 and 2016 to determine the appropriate site for the new seaplane base. 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 be 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 2 lists 12 alternative sites that were evaluated in 2002, 2012, and 2016 (HDR 2002; DOWL HKM 2012; DOWL 2016; Figure 4 in Appendix A). None of these alternative sites meet the feasible and prudent standard, as documented below.

Table 2: Alternative Sites Evaluated and Dismissed

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Starrigavan Bay	<ul style="list-style-type: none"> • No protection from open ocean swells • Large wind chop from southeast, north and west • Water typically choppy and rough • Huge wakes from large boats and ferry • No room for upland development • High level of salmon and waterfowl use • Too far from town for seaplane pilots and community 	<p>A – Safety concerns, lack of upland facilities, and distance from community activity area compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns 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.</p> <p>C – Environmental concerns regarding salmon and waterfowl use.</p> <p>G – Construction, maintenance, and operational costs high due to remote location.</p> <p>I – The combination of factors A, B, C, and G cumulatively result in problems of extraordinary magnitude.</p>
Existing Site	<ul style="list-style-type: none"> • Rocks and boulders under the water • Wildlife hazard from adjacent fish processing plant • Significant 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 	<p>A – Safety concerns, inadequate space for aircraft parking and maneuvering, and lack of room for upland facilities compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns related to bird hazards, other water user conflicts, tight maneuvering area. Operations are limited at low tide.</p> <p>H – There is virtually no potential for upland facilities.</p> <p>I – The combination of factors A, B, and H cumulatively result in problems of extraordinary magnitude.</p>

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Eliason Harbor	<ul style="list-style-type: none"> 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 High level of boat traffic Possible strong local opposition to upland development for seaplane facilities 	<p>A – Safety concerns and lack of space for upland facilities would compromise purpose and need.</p> <p>B – Unacceptable safety concerns related to high boat use, shallow waters, and icing.</p> <p>C – Social, economic, and environmental concerns. Conflicts with fishing and other boating uses that are important to Sitka’s social and economic identify. Environmental concerns regarding salmon and waterfowl use.</p> <p>H – Uplands completely developed; little opportunity for upland support facilities.</p> <p>I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.</p>
Mt. Edgecumbe	<ul style="list-style-type: none"> 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 	<p>A – Lack of potential for upland facilities compromises purpose and need.</p> <p>B – Safety issues related to exposure to wind and waves.</p> <p>C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL.</p> <p>H – Uplands completely developed; little opportunity for upland support facilities.</p> <p>I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.</p>
SEARHC Cove	<ul style="list-style-type: none"> Closer to residential and institutional area More exposure of dock to wind and wave action More potential to affect eelgrass habitat 	<p>B – Safety issues related to exposure to wind and waves.</p> <p>C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL.</p> <p>I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.</p>
Japonski Lagoon	<ul style="list-style-type: none"> 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 	<p>B – Safety problems related to exposure to wind and waves in proposed operations area; retains wildlife hazard proposed to be mitigated through Sitka Airport Master Plan.</p> <p>C – Social, economic, and environmental concerns due to incompatibility with Sitka airport; impacts on Sitka airport has potential for substantial economic and social effects.</p> <p>I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.</p>

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Charcoal Island	<ul style="list-style-type: none"> Significant wave, sea swell, and wind energy Long taxi into Sitka Channel Large wind chop from prevailing winds Expense of constructing breakwater protection 	<p>A – Distance from activities focus in Sitka Channel and safety concerns regarding wind and wave exposure and conflicts with Sitka airport operations compromises project’s ability to meet purpose and need.</p> <p>B – Safety concerns with operations area from open water wind and wave exposure, and conflicts with Sitka Airport operations.</p> <p>I – The combination of factors A and B cumulatively result in problems of extraordinary magnitude.</p>
Sawmill Cove	<ul style="list-style-type: none"> 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 	<p>A – Safety concerns and distance from community compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns; related to open ocean waves, strong and turbulent winds, and topography.</p> <p>G – Construction, maintenance, and operational costs high due to remote location.</p> <p>I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.</p>
Safe Harbor	<ul style="list-style-type: none"> Exposed to prevailing winds and waves Close proximity to U.S. Coast Guard (USCG) vessel dock and operations Wildlife hazards from seafood processing sites 	<p>A – Safety concerns related to wind and wave exposure and lack of upland development potential compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns; conflicts with USCG vessel operations.</p> <p>C – Land use compatibility concerns due to USCG operations and noise near high school.</p> <p>I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.</p>
Work Float	<ul style="list-style-type: none"> 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 	<p>A – Safety concerns and lack of upland development potential compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns; conflicts with boat fueling area and USCG vessel operations.</p> <p>C – Land use concerns related to displacement of current work float use and noise near high school.</p> <p>I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.</p>
Jamestown Bay	<ul style="list-style-type: none"> Turbulent wind due to surrounding topography Large number of downwind takeoffs Significant exposure to southwest swells High level of small and large boat traffic Upland area mostly residential 	<p>B – Unacceptable safety concerns related to wind and wave exposure and turbulent winds due to topography. Conflicts with small and large boat traffic.</p> <p>C – Land use compatibility concerns with residential area.</p> <p>I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.</p>

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Herring Cove	<ul style="list-style-type: none"> 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 	<p>A – Safety concerns and distance from community compromise project’s ability to meet purpose and need.</p> <p>B – Unacceptable safety concerns; unacceptable operational concerns due to distance from community and lack of potential for upland facilities.</p> <p>G – Construction, maintenance, and operational costs high due to remote location.</p> <p>I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.</p>

Sources: HDR 2002; DOWL HKM 2012; DOWL 2016

5.1.3 Smaller Development Plan

FAA evaluated the potential to preserve the observation post in place and design the seaplane base facilities around it (Figure 5; Appendix A). However, the proposed new seaplane base is designed to provide safe maneuvering and operations, while providing facilities to support future growth and sustain itself through user fees.

The smaller development plan with the observation post intact and the seaplane facility built around it was determined not to be feasible and prudent for the following factors (from Table 1).

- 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 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.

5.2 Alternatives Under Consideration

As the location of the proposed SPB was the only feasible siting option, site design alternatives were evaluated to determine if avoidance of the observation post was feasible and are detailed below. Analysis is ongoing until Section 106 is completed. Several alternatives to either avoid or minimize impacts to the observation post and gun emplacement are currently being evaluated and are described below.

5.2.1 Leaving Observation Post and Gun Emplacement

5.2.1.1 Maintain Current Design of Apron and Haul Out Ramp

One potential minimization option would be to allow the observation post and gun emplacement to remain in place and construct the apron, as designed, around it. The gun emplacement, due to its elevation and being a feature of the ground itself, would be wholly buried by fill. The observation post

would likely protrude approximately # feet of apron, leaving it intact, but not fully observable in its original state. This alternative is being evaluated to determine if constructability or function of the apron would be impacted by retaining the observation post, such as drainage issues, potential effects to the observation post foundation from compression of the fill necessary to construct the apron, and whether the structure is sound enough to withstand adjacent blasting. Further, this alternative would be evaluated to determine if leaving the observation post in place would be consistent with public access goals of the proposed SPB and if creating an attraction would pose security issues.

5.2.1.2 *Reconfigure Seaplane Haul Out Ramp*

The current location of the observation post is approximately 60 feet from the proposed location of the haul out ramp, placing it within the area vehicles would use to maneuver seaplanes. This alternative would be evaluated to determine which site specifications apply to the apron to determine if the observation post would create safety impacts (e.g., required site distance for taxiing and movement of design aircraft). If left in place, the observation post could incur, or obstruct, taxiing site distance, thereby hindering the ability to safely maneuver planes from the haul out ramp to tie-down areas. Another aspect to be evaluated would be if the haul out ramp located on the west side of the apron could be moved, however the location and angle of the haul out ramp was due to that location being the most protected by wave action.

5.2.2 **Move Observation Post**

Moving the observation post would potentially avoid constructive use of the observation post, however the gun emplacement cannot be moved. This alternative is being evaluated by determining the logistical and operational costs of movement and maintenance. Moving the observation post would first include analysis of its structural soundness. Assuming it is structurally sound, the following would be evaluated:

- Available sites appropriate to house the observation post. Factors may include finding land that would not require purchase.
- Availability of appropriate equipment, vehicles and expertise needed to move the observation post
- Determination of how to remove the observation post from its foundation and stabilize it for safe movement
- Determine what type of a new foundation would be necessary

6.0 **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.

Once alternatives detailed in Section 5.2 are thoroughly evaluated would it be determined if there are no feasible and prudent alternatives.

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. Two measures have been identified thus far:

- Changing the project design to lower the site elevation, reorienting the seaplane floats, and incorporating landscaping at the Seward Avenue boundary of the site to minimize the potential for visual effects on the portion of the NHL adjacent to the Project site.
- 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 working draft MOA, which is anticipated to be executed Fall 2025, is in Appendix B. The working draft included in Appendix B has been initially reviewed by signatories but mitigation measures have not yet been finalized.

8.0 CONCLUSION AND FINDINGS

Analysis is ongoing in conjunction with the Section 106 consultation process. The FAA will continue to consider all feasible and prudent alternatives meeting the project's purpose and need that could avoid using the Section 4(f) property and include all possible planning to minimize harm resulting from the use. 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 3 lists efforts conducted in support of this Section 4(f) Evaluation. Appendix C contains copies of meeting correspondence.

Table 3: Record of Coordination Relative to the Section 4(f) Property

Date	Activity	Description	Meeting 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

Date	Activity	Description	Meeting Notes in Appendix C
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

Completion of the Section 106 process is anticipated in Fall 2025 once a public comment period is completed and signatories execute the MOA and is filed with Advisory Council on Historic Preservation.

10.0 REFERENCES

Bush, J.D. 1944. Narrative Report of Alaska Construction 1941–1944. U.S. Army, Alaskan Department, Construction Division.

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.

National Park Service (NPS). 2020. Draft National Historic Landmark Nomination: Sitka Naval Operating Base and U.S. Army Coastal Defenses.

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.

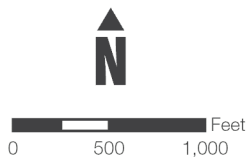
U.S. War Department. 1940. Engineer Field Manual: Field Fortifications. U.S. Government Printing Office, Washington, D.C.

APPENDIX A:

FIGURES



 Preliminary Project Footprint

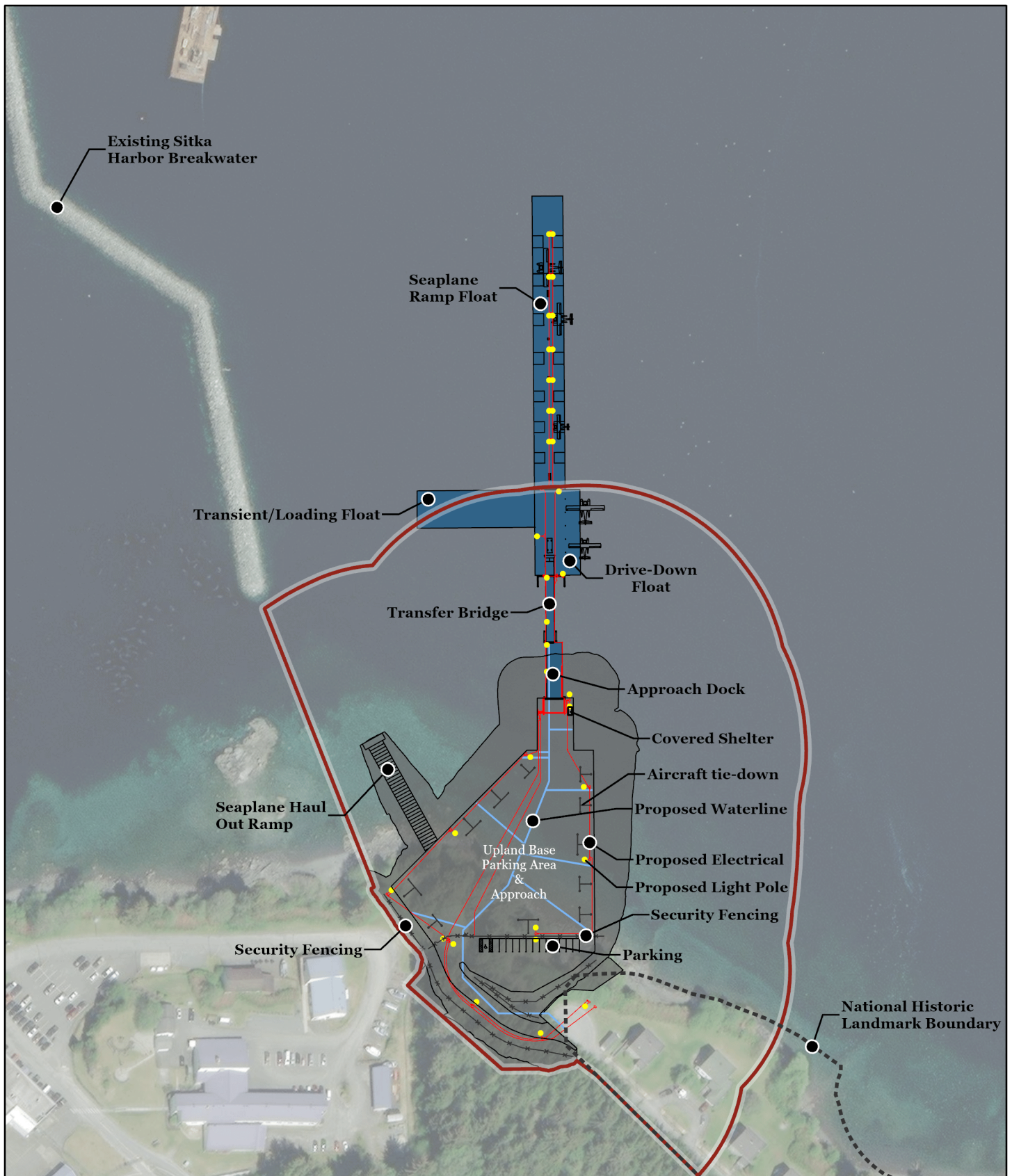


Location & Vicinity Map

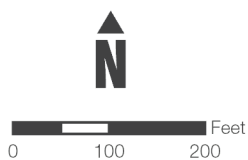
Sitka Seaplane Base
Section 4(f) Evaluation

Figure 1

December 2024



- Area of Potential Effect
- Marine Project Components
- Upland Project Components

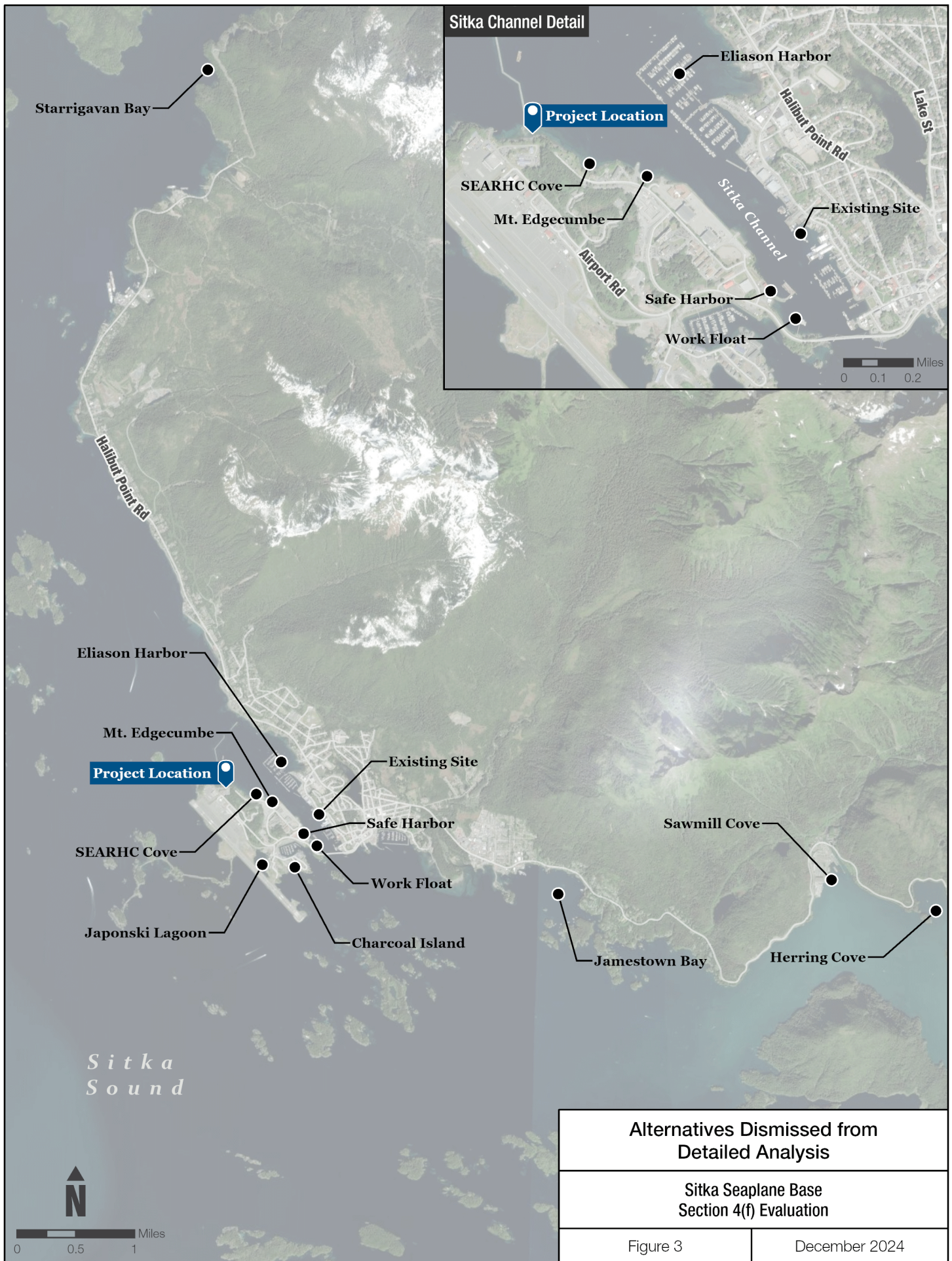


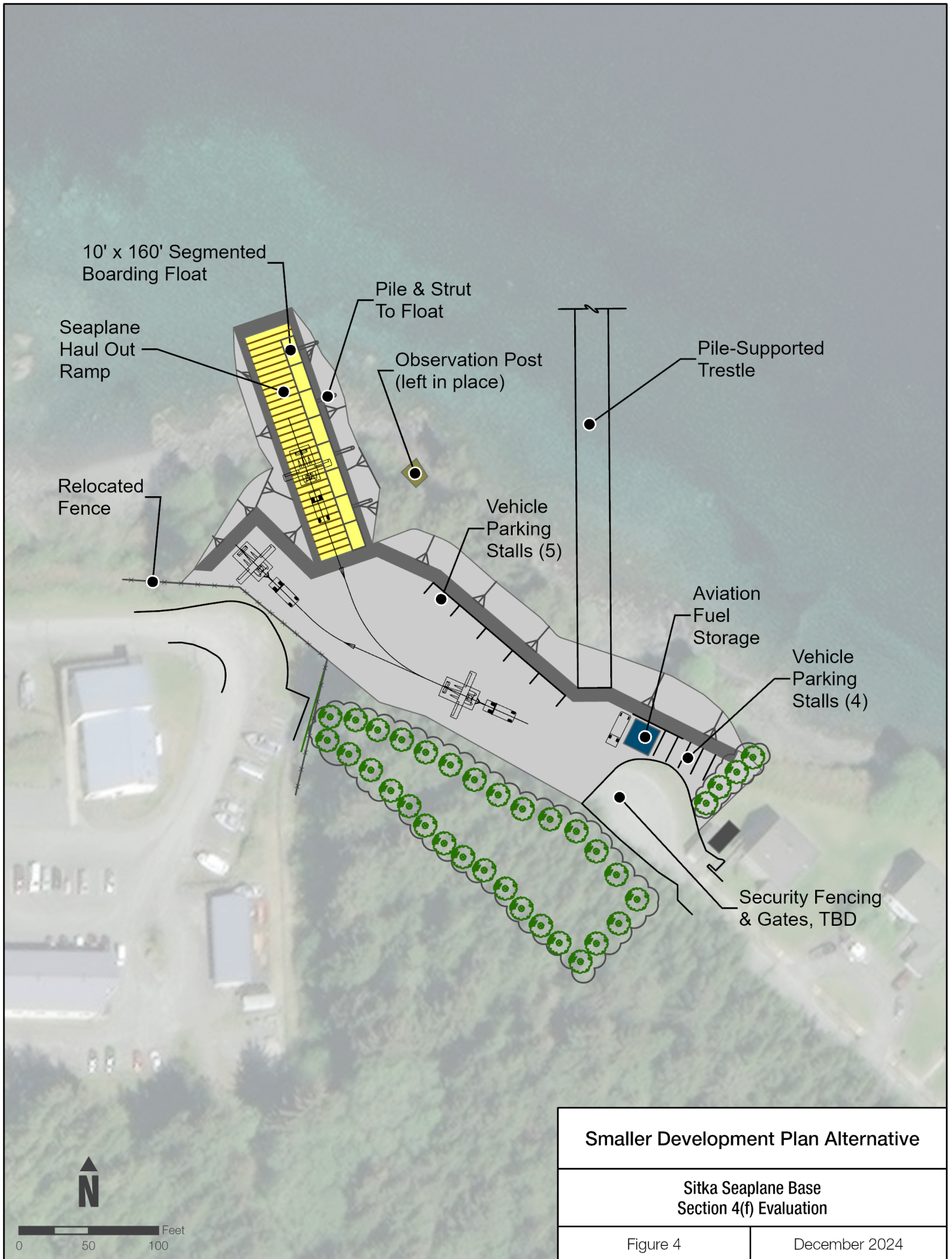
Project Elements in Area of Potential Effect

Sitka Seaplane Base
Section 4(f) Evaluation

Figure 2

December 2024





APPENDIX B:
DRAFT MEMORANDUM OF
AGREEMENT

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

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

PREAMBLE

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

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

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

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

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

WHEREAS, the FAA sponsored a cultural resources survey of the APE in 2021 which documented

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

the Japonski Island Observation Post and Gun Emplacement (SIT-01115), and FAA has determined, and SHPO concurred, that SIT-01115 is eligible for listing in the National Register of Historic Places (NRHP); and

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

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

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

WHEREAS, a review of the AHRS indicates no historic properties are within the 65 dB DNL noise contour; and

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

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

WHEREAS, the FAA has consulted with the Alaska (SHPO) on the determination of effect and SHPO concurred on July 1, 2025; and

WHEREAS, the FAA consulted with the National Park Service on the indirect effects to the NHL and NPS has agreed to participate in the development of this agreement, and will be invited to sign the agreement as a Concurring Party; and

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

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

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

WHEREAS, consultation with the STA indicated that there remains the potential for the inadvertent

discovery of artifacts, or burials/human remains on the upland portion of the Project APE resulting in implementation of an archaeological monitoring and inadvertent discovery plan during geotechnical investigations in 2022; and

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

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

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

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

STIPULATIONS

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

I. Scope and Objectives

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

II. Professional Qualifications Standards

- Unless otherwise specified, all actions prescribed by this MOA that involve the identification, evaluation, analysis, recording, treatment, monitoring, or disposition for historic properties, or that involve reporting or documentation of such actions in the form of reports, forms, or other records, shall be carried out by or under the direct supervision of a person or persons

who meet at a minimum the SOI Professional Qualifications Standards (48 FR 44738-44739; Appendix A to 36 CFR 61) in the appropriate discipline. FAA and CBS shall ensure that consultants retained for services pursuant to this agreement meet these standards.

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

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

- To avoid intrusive visual effects to SIT-00079, CBS has modified the Project design to lower the elevation of the site and incorporate vegetative screening buffers along the eastern boundary of the Project site. The vegetative buffer has been incorporated into the Airport Layout Plan which depicts existing and future facilities of an airport and serves as a blueprint for airport development.
- CBS will develop a Vegetative Screening Plan that includes plans to design, install, and maintain vegetative screening that 1) provides a sufficient visual buffer between SIT-00079 and the Project; and 2) is consistent with naturally occurring vegetation in the area. The Vegetative Screening Plan will also include measures to be taken if vegetation fails. CBS will submit a draft Vegetative Screening Plan to the FAA, SHPO, and NPS as part of the 65% design package for the Project. FAA, SHPO, and NPS shall have a 30-day review and comment period. FAA will consider comments received for modification to the Vegetative Screening Plan and CBS will provide written responses to any questions or concerns regarding the appropriateness of the proposal.
- Should changes be made to Project design or proposed vegetative screening, CBS will submit a revised Vegetative Screening Plan with the 95% design package to the FAA, SHPO, and NPS, for a 30-day review and comment period. FAA will consider comments received and CBS will provide written responses to any questions or concerns regarding the appropriateness of the proposed vegetative screening.

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

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

- CBS, or a contractor on its behalf, will coordinate with the NPS and the HABS Regional Coordinator to ensure a permanent record of the structure and its characteristics are preserved in perpetuity.
- The documentation generated through the HABS process may be incorporated into other preservation media (e.g., signage, pamphlets, online exhibits), disseminated to interested parties and institutions.
- Concurrent with the Modified Level IV HABS documentation of SIT-01115 above, the spatial inter-relationships of feature components of SIT-01115 will be recorded and mapped using survey-grade GPS equipment. Documentation may include use of three-dimensional scanning equipment, as applicable.
- CBS, or consultants hired on their behalf, will assemble the HABS documentation and mapping of the WWII features within the APE into a technical report and provide to FAA for review and approval. Following FAA approval, CBS will provide copies of the report and data to the Alaska Office of History and Archaeology Historic (OHA), the NPS, and other interested consulting parties no later than one year after the field data has been collected.

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

- To address post-Section 106 discoveries and resolve any adverse effects to archaeological materials or inadvertent disturbance of human remains which may be present within the Project APE.
- The FAA and CBS shall ensure that an archaeological monitor who meets the SOI's Professional Qualification Standards for Archaeology shall be present during ground disturbing activities within upland Project areas.
- CBS will offer to hire a tribal monitor for archaeological monitoring activities, to be designated by STA.
- FAA, in coordination with CBS, has developed a *Cultural Resources Monitoring and Inadvertent Discovery Plan* in consultation with SHPO, NPS, and STA (Attachment B). The Plan is consistent with the OHA Preservation Series No. 15 *Monitoring Guidelines* (OHA 2018) and OHA Preservation Series No. 16 *Inadvertent Discovery and Unanticipated Effects* (OHA 2022).
- The purpose of the *Cultural Resources Monitoring and Inadvertent Discovery Plan* is to describe the activities associated with archaeological monitoring, identify the roles and responsibilities of Project participants, and to provide clear and concise guidance for Project personnel that addresses the actions to be taken in the event that human remains or archaeological, historic, or cultural materials, are discovered during monitored ground disturbing activities associated with the Project.

- CBS shall require that a preconstruction meeting employing a presentation provided by FAA is conducted among the CBS Project Manager, the Construction Contractor/Onsite Supervisor, the Archaeological Monitor and the Tribal Monitor to discuss the terms and conditions of the *Cultural Resources Monitoring and Inadvertent Discovery Plan* (Attachment B).

- CBS, or consultants hired on their behalf, shall prepare a report, meeting contemporary professional standards and the *SOI Standards and Guidelines for Archaeological Documentation* (48 FR 44734-44737) following the completion of monitoring activities by the Archaeological Monitor and provide a draft to FAA for review and approval. Following FAA approval, CBS shall ensure that the final report is provided to all consulting parties within one (1) year after completion of all archaeological monitoring.

VI. Inadvertent Discoveries of Cultural Resources

- If previously unidentified cultural resources (including artifacts, structures, or features) are encountered, the FAA shall require CBS or its contractor to implement the Inadvertent Discovery protocols contained in Appendix B of this MOA.
- In the event that FAA determine the inadvertent discovery is eligible for the NRHP, and SHPO concurs, the FAA shall develop actions to resolve any adverse effects, consistent with the *SOI Standards and Guidelines for Archaeology and Historic Preservation* (48 FR 44716), through consultation amongst the FAA, CBS, SHPO, STA, and consulting parties. The FAA and CBS shall ensure that the resolution measures are implemented.

VII. Curation

- Any materials collected as part of archaeological monitoring efforts shall be curated at the CBS' (landowner) expense, in accordance with 36 CFR 79, at the University of Alaska Museum of the North under an approved provisional curation agreement, or at another repository within the State as determined by FAA and CBS in consultation with consulting parties.
- Conservation costs may include, but are not limited to, curation fees charged by approved institutions, acquisition of archival materials, shipping, cleaning, rehousing, and any other conservation action determined necessary by a qualified conservator or considered common/ethical practice by cultural resources professionals.
- Should archaeological materials consist of artifacts of Alaska Native affiliation, CBS will consult with STA as to the appropriate disposition of those materials. STA may request that CBS relinquish ownership of the materials to STA, at which point CBS will provide documentation of the transfer of materials to the Tribe.

VIII. Unanticipated Effects

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

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

- Should a consulting party observe unanticipated effects to historic properties, the consulting party will notify the FAA and CBS within 48 hours of observing the unanticipated effects. The FAA shall consult with SHPO and the consulting party to identify the effects.

- FAA shall assess the unanticipated effects. Consistent with 36 C.F.R. § 800.5(b) and (d)(1), the FAA may determine that there is no adverse effect on historic properties if the observed effects would not meet the Criteria of Adverse Effect at 36 CFR 800.5(a)(1).

- If the unanticipated effects are determined to be adverse, FAA shall consult with CBS and SHPO (and other consulting parties, as appropriate) pursuant to 36 CFR 800.13 to determine if adverse effects can be avoided by alteration of construction methods or the installation of protective measures.

- If adverse effects cannot be avoided, FAA shall develop actions to resolve the adverse effects, consistent with the *SOI Standards and Guidelines for Archaeology and Historic Preservation* (48 FR 44716), through consultation amongst the FAA, CBS, SHPO, and other consulting parties, as appropriate. The FAA and CBS shall ensure that the resolution measures are implemented.

IX. Treatment of Human Remains

- In the event that human remains are encountered during Project construction activities, FAA and CBS shall ensure that they are at all times treated with dignity and respect, in a manner consistent with the ACHP's *Policy Statement on Burial Sites, Human Remains, and Funerary Objects* (<https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf>).

- Should human remains be encountered, work will be stopped at once in the vicinity of the discovery and a buffer zone created, to be determined at the discretion of the SOI-qualified Archaeological Monitor, to prevent further disturbance. The Archaeological Monitor (or Onsite Supervisor, if monitor is not present) shall immediately secure the area in accordance with Attachment B, *Cultural Resources Monitoring and Inadvertent Discovery Plan*, initiate notification to parties listed in Attachment C, *Human Remains Contacts*, and follow the procedures listed in Attachment D, *Sitka Seaplane Base Security and Media Plan*.

- To the greatest extent possible and provided there are no legal or jurisdictional issues to the contrary, the FAA and CBS shall work with STA to transfer control of any indigenous human remains to STA in an expedited and respectful manner.

X. Confidentiality

- Pursuant to 36 CFR 800.11(c), the consulting parties to this MOA agree not to divulge to the public, media, or other outside parties the specific location of the discovery, names of the deceased or descendants (if determined), or specific details about the remains or artifacts themselves, should human remains or artifacts of Alaska Native affiliation be discovered. All consulting parties shall follow the authorized protocols for press releases, media interviews, or other public communications outlined in Attachment D: *Sitka Seaplane Base Security and Media Plan* to this agreement.

XI. Review and Reporting Timeline

- The FAA and CBS shall arrange a meeting to review this agreement one (1) year from its execution date and annually thereafter until completion of site preparation and soil disturbance. The FAA and CBS shall submit an annual letter status update to all parties one (1) month prior to the date of the annual review. Any amendments to this agreement recommended during the review shall be considered in accordance with CFR 800.6(c)(7). If the review results in a recommendation to terminate the agreement, termination of the agreement shall be considered in accordance with 36 CFR 800.6(c)(8).
- The Vegetative Screening Plan will be submitted for a 30 day review period at the completion of the 65% design. The revised Vegetative Screening Plan will be submitted for a 30 day review period at completion of the 95% design. See III for complete deliverable details.
- The Modified Level IV HABS report will be approved by FAA and provided to the OHA within one year of data collection. See IV for complete deliverable details.
- The Archaeological Monitoring Report will be approved by FAA and provided to all consulting parties within one year of completion of all archaeological monitoring. See V for complete deliverable details.

XII. Dispute Resolution

- Should any signatory object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FAA shall consult with such party to resolve the objection. If FAA determines that the Section 106-related objection cannot be resolved through consultation, it shall request the further comments or staff level recommendations from the ACHP pursuant to 36 CFR 800.6(b). Any ACHP comment provided in response to such a request will be taken into account by FAA in accordance with 36 CFR 800.6(c)(2).

XIII. Amendments

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

XIV. Anti-Deficiency Act

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

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

XV. Duration

- This agreement shall be implemented upon final construction contracting to include the stipulations in this MOA and continue in full force and effect for five years following execution. At any time, CBS may request of the FAA and SHPO in writing to review CBS's project schedule and consider an extension or modification of this agreement. No extension or modification shall be effective unless all Signatories to the agreement have agreed to it in writing.

XVI. Termination

- Any Signatory to this agreement may terminate it by providing thirty (30) days' notice to the other Signatories. The Signatories will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FAA will seek the comments of ACHP pursuant to 36 CFR 800.7.

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

SIGNATURE PAGES – SIGNATORIES

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

SIGNATORY

Federal Aviation Administration

By: _____

Name and Title

DATE: _____

SIGNATURE PAGES – SIGNATORIES

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

SIGNATORY

ALASKA STATE HISTORIC PRESERVATION OFFICER

By: _____

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

DATE: _____

SIGNATURE PAGES – INVITED SIGNATORIES

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

INVITED SIGNATORY

CITY AND BOROUGH OF SITKA

By: _____

Name and Title

DATE: _____

SIGNATURE PAGES – CONCURRING PARTIES

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

CONCURRING PARTY

SITKA TRIBE OF ALASKA

By: _____

Name, Title

DATE: _____

SIGNATURE PAGES – CONCURRING PARTIES

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

CONCURRING PARTY

U.S. DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE

By: _____

Jeff Mow, Acting Regional Director, National Park Service Interior Region 11

APPENDIX C:
CONSULTING PARTIES
CORRESPONDENCE



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.

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 ordinance 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 Japanski? 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 where 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:
◆		
◆		
◆		
◆		

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:

Kelli Cropper
Ben Mejia
Jack Gilbertsen
Rodney Clark
Janet Clemens
Jeff Feldpausch
Sarah Meitl
Jake Anders
Caity Kennedy
Emily Creely
Maryellen Tuttle
Ken Nichols

ORGANIZATION:

City and Borough of Sitka
City and Borough of Sitka
Federal Aviation Administration
Federal Aviation Administration
National Park Service
Sitka Tribe of Alaska
State Historic Preservation Office
DOWL
DOWL
DOWL
DOWL
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

MEETING AGENDA

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 due 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
♦		
♦		
♦		