APPENDIX J:

GOVERNMENT-TO-GOVERNMENT CORRESPONDENCE

Appendix J: G2G Documentation

April 20, 2021: Sitka Tribe of Alaska Request for Consultation under Section 106 of National Historic Preservation Act Regarding Sitka Seaplane Base
November 22, 2021: FAA and Sitka Tribe of Alaska Government to Government Meeting Presentation Materials
November 22, 2021: City and Borough of Sitka G2G meeting comment response
August 30, 2022: Reinitiating G2G Consultation between STA and FAA, Regarding Sitka Seaplane Base's Reconstruction Project
April 20, 2022: Sitka Seaplane Base Reconstruction G2G Tribal Consultation Continuation
October 28, 2022: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation
October 5, 2022: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation
September 16, 2022: Alternatives Selection
September 6, 2023: FAA and Sitka Tribe of Alaska Meeting (Draft Noise Study)
September 16, 2024: City and Borough of Sitka New Seaplane Base (Project update)
April 17, 2024: Sitka Tribe of Alaska (Project Update)
January 31, 2024: Sitka SPB (2024 Noise Study Revisions)
February 5, 2025: FAA to Sitka Tribe of Alaska (Project Update)

April 20, 2021

Mr. Woody Widmark, Chairman
Sitka Tribe of Alaska
456 Katlain Street
Sitka, AK 99853

Re: Request for Consultation under Section 106 of National Historic Preservation Act
Regarding Sitka Seaplane Base

Dear Mr. Widmark:

The Federal Aviation Administration (FAA) is providing funding to the City and Borough of Sitka (CBS) for the planning and environmental review of a proposed new seaplane base on Japonski Island in Sitka. The expenditure of federal funds constitutes an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA; 54 USC 306108). Consistent with the implementing regulations of Section 106 of the NHPA (36 CFR 800), the FAA and CBS respectfully request a Section 106 consultation meeting with the Sitka Tribe of Alaska (Tribe) to discuss historic properties of religious and cultural significance to the Tribe that could be adversely affected by the proposed project.

Outreach History

On November 20, 2019, the FAA invited the Tribe to consult on a government-to-government basis with the FAA regarding the proposed construction of the new seaplane base (see attached letter). This invitation letter provided a description of the proposed project, location information, a commitment by the FAA to keep confidential any sensitive religious, traditional, or cultural information provided by the Tribe, figures displaying the area of potential effect (APE), and contact information for the FAA. As of April 20, 2021, the FAA has not received a response to this invitation to consult.

However, during a February 10, 2021 meeting of the Sitka Historic Preservation Commission and a February 17 meeting with the general public on the project's environmental review document, members of the Tribe provided comments and requested that the FAA and CBS meet with the tribe directly.

On March 19, 2021, FAA and CBS met with the Tribe's Resource Protection Committee and with the Tribal Council to discuss the project, the environmental review document, and the Tribe's input and comments on them. In particular, the Tribe provided comments on the need for an inadvertent discovery plan for site work and a request that the Tribe be the first party notified if human remains were found. The Tribe also provided information on the historic use of the shoreline for subsistence harvests of marine life, including abalone.

As a consulting party of the Section 106 process for the Project, the Tribe participated in a Section 106 consultation meeting on April 16, 2021 with other consulting parties to discuss the development of a Memorandum of Agreement that would include an inadvertent discovery plan, provisions for archaeological and tribal monitoring, and mitigation strategies for a historic WWII structure identified within the APE of the project. Tribal counsel at that meeting suggested that there may be historic

properties of religious and cultural significance to the Tribe within the APE which have not yet been identified and requested additional consultation with the Tribe.

Current Request

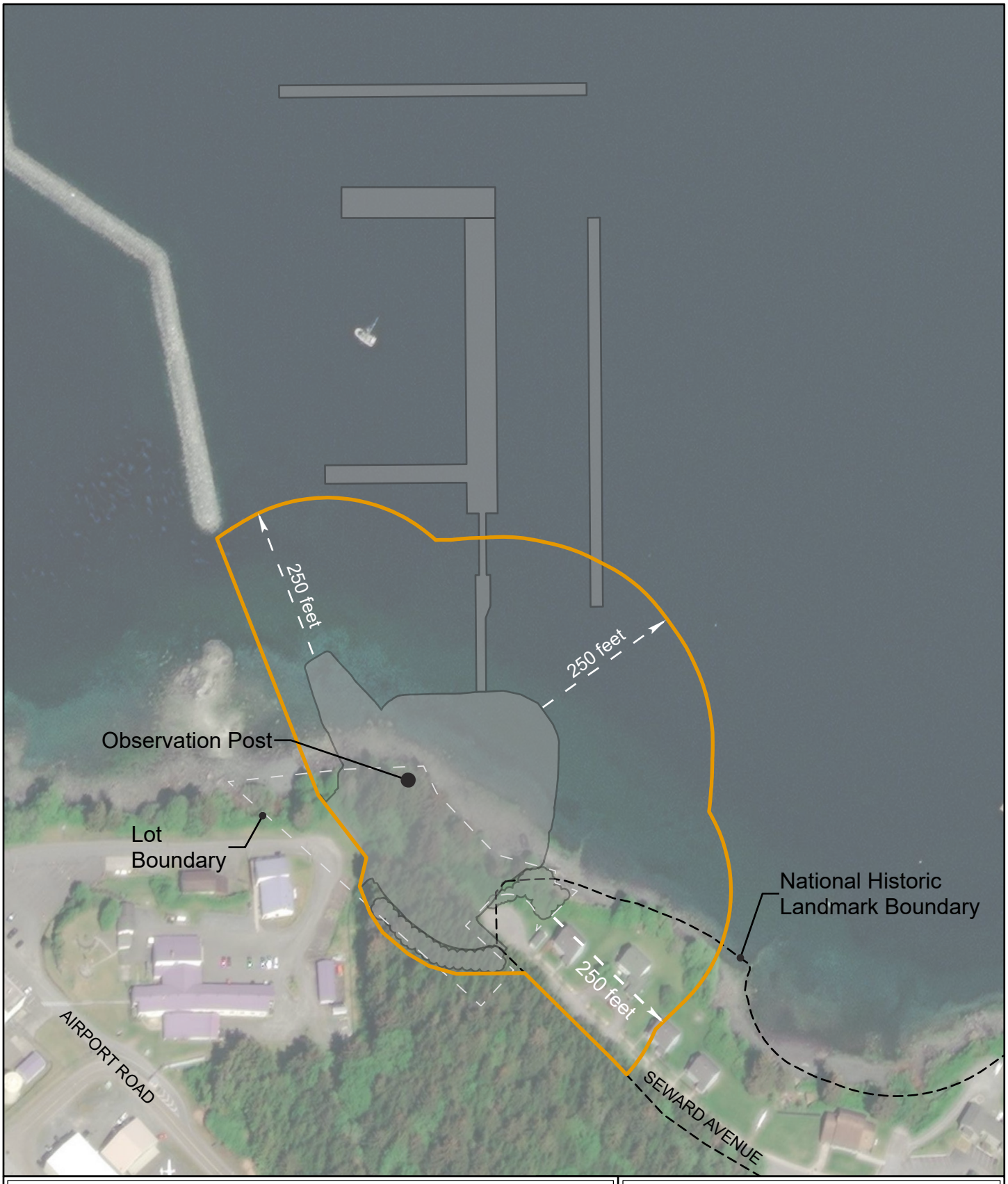
The FAA and CBS respectfully request to meet with the Tribe to consult on the identification of any additional historic properties of religious and cultural significance to the Tribe that may be present within the APE of the project (see attached). If the Tribe believes it is appropriate, FAA and CBS would be happy to attend your next Tribal Council meeting in mid-May 2021, or at any other time in the near future preferable to the Tribe.

We appreciate your interest and participation in the Section 106 consultation process for the project. Tribal members have provided important information which has been incorporated into the environmental review document (see attached), and we are working to ensure that concerns raised by the Tribe during the Section 106 process are considered and included in the development of project agreement documents. We look forward to continuing our discussion with you in the near future.

Sincerely,

Jack Gilbertsen
Lead Environmental Protection Specialist
FAA Alaska Region

Enc: Section 106 Initiation Letter
Current APE figure
Revised Sections of Sitka Seaplane Base Environmental Assessment



Proposed Area of Potential Effect
Lot Boundary
Project Footprint
National Historic Landmark Boundary

N

Section 34-35, T55S, R63E, Copper River Meridian

0 150 300 Feet

Proposed Area of Potential Effect

Sitka Seaplane Base
Environmental Assessment

Date: January 15, 2021

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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

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

November 20, 2019

New Sitka Seaplane Base, AIP 3-02-0488-001-2019, Sitka, Alaska, Government-to-Government Consultation Initiation

Anne Davis
Sitka Tribe of Alaska (IRA)
456 Katlian Street
Sitka, AK 99835-7505

Dear Ms. Davis,

The Federal Aviation Administration (FAA) in cooperation with the owner and operator of the Sitka Seaplane Base, the City and Borough of Sitka is proposing to construct a new seaplane base on the north end of Japonski Island to replace the existing seaplane base on the west shore of Baranof Island.

Purpose of Government-to-Government Consultation

The primary purpose of government-to-government consultation as described in Federal Executive Order 13175 "Consultation and Coordination with Indian Tribal Governments" and FAA's Order 1210.20 "American Indian and Alaska Native Tribal Consultation Policy and Procedures" is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect Tribes.

Consultation Initiation

With this letter, the FAA is offering to consult on concerns that uniquely or significantly affect your Tribe related to the potential action described below. Early identification of Tribal concerns will allow the FAA and the airport owner and operator to consider ways to avoid and minimize potential impacts to Tribal resources and/or cultural practices as project planning and alternatives are developed and refined. We would be pleased to discuss details of the proposed project and its potential impacts with you.

Project Information

The purpose of the proposed project is to replace the existing seaplane base which has been operating at its current location for 65 years and is at the end of its useful life. The project proposes to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base. The project is located at approximately 57.06° North and 135.36° West; in Sections 34–35 of Township 55 South, Range 63 East, Copper River Meridian (USGS Quadrangle Sitka A-5) (Figure 1).

1) Acquisition of Land. CBS plans to acquire lands on shore (uplands) and tide & submerged lands for construction of the new seaplane base. CBS proposes to acquire the uplands with FAA Airport Improvement Program (AIP) Land Acquisition grant funds. CBS has also submitted an application for tidelands and submerged lands to the Alaska Department of Natural Resources (ADNR) for approximately 23 acres for construction of seaplane floats and associated infrastructure and the seaplane operating area.

2) Construction of New Seaplane Base. This project tentatively includes the following elements (Figure 2):

- New fuel storage and distribution system
- Vehicle parking area
- On-site aircraft maintenance capability
- A drive-down ramp to the seaplane base floats
- Electricity, water and sewer, and lighting
- Float slips for based seaplanes and for transient seaplanes
- Safe access between the parking positions and the water operating are, and
- Options to accommodate future growth with potential float expansion.

3) Demolition of Existing Seaplane Base. This project will include the removal/disposal of the existing seaplane floats located at the previous seaplane area.

Confidentiality

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

FAA Contact Information

If you wish to provide comments related to this proposed project, please contact:

FAA Airports Division
ATTN: **Venus Larson**
222 West 7th Avenue, Box 14
Anchorage, AK 99513-7587
Fax: 907-271-2851
Email: Venus.Larson@faa.gov

Project Consultation Options Form

Your timely response will assist us in incorporating your concerns into project planning. For that purpose, we respectfully request that you complete the enclosed Project Consultation Options form and forward it to the FAA within thirty (30) days of your receipt of this correspondence.

Sincerely,

Venus Larson
Project Manager

Enclosures:

- Tribal Consultation Options form
- Figure 1. Project Vicinity Map
- Figure 2. Preliminary Project Concept Map
- Figure 3. Project Preliminary APE

Cc:
Kelli Cropper, Project Manager, City and Borough of Sitka

Tribal Government to Government Consultation Response Form

[Name of Tribe]
[Tribal office address]

Project Name: *[Name]*
Federal/State Project Numbers: *[Federal/State Project Numbers]*

Please check a response, provide contact information, sign and mail, email or fax this form to FAA.

____ The *[Name of Tribe]*, a federally recognized tribe, would like to consult with the FAA in a government-to-government relationship for this proposed project.

____ The *[Name of Tribe]* has no interest associated with this proposed project and further consultation is not required.

_____ _____
Tribal Leader (Please print) Telephone

_____ _____
Tribal Leader (Signature) Date

If you have decided to consult, please identify a Tribal Representative for the consultation.

_____ _____
Name of Formal Tribal Representative (Please print) Telephone

_____ _____
Name of Formal Tribal Representative (Signature) Date

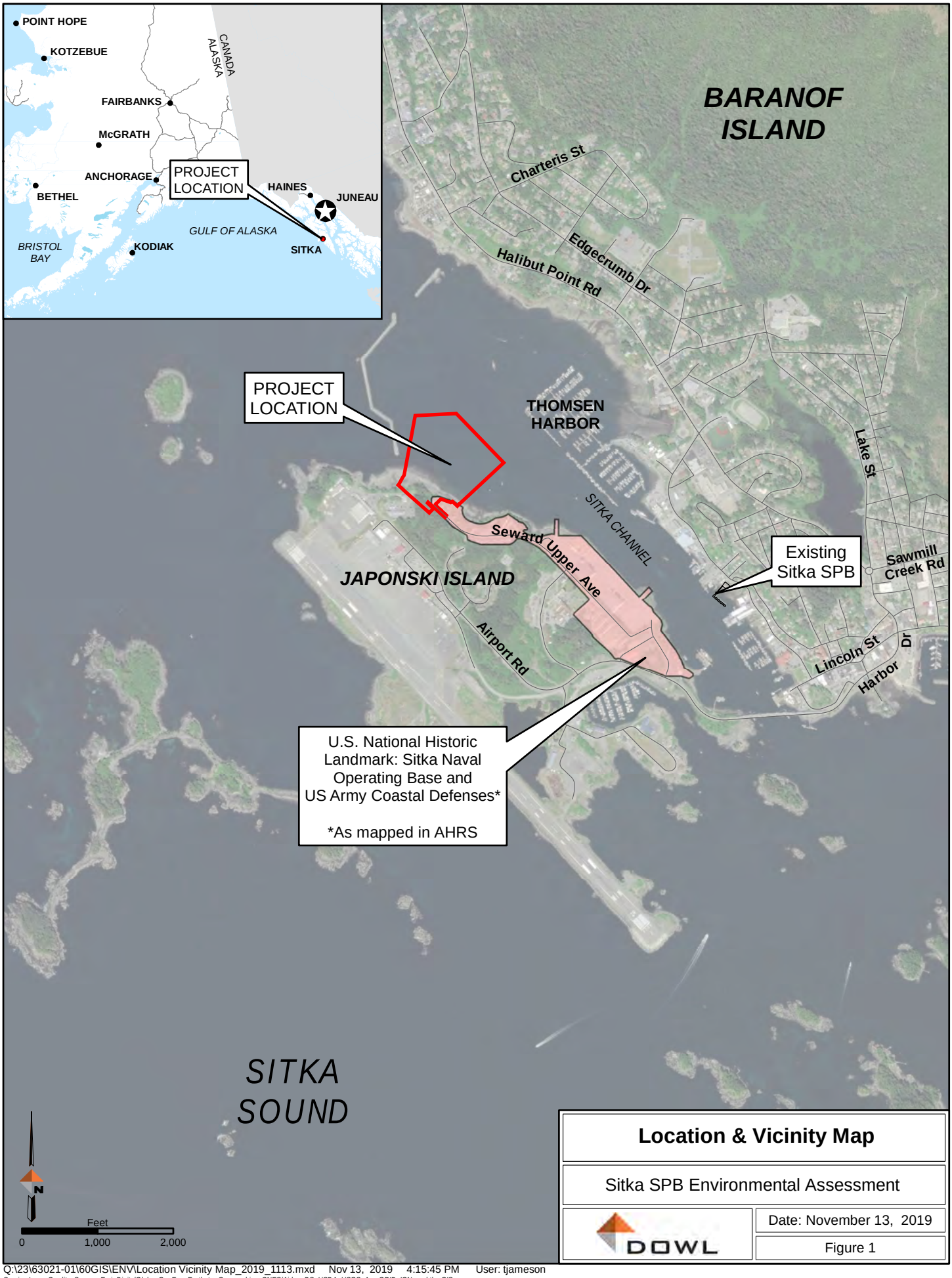
Tribal Contact information:

Phone:
Fax:
e-mail:
Other: (please describe)

Please mail, email, or fax Response Form

FAA Airports Division
ATTN: Venus Larson
222 West 7th Avenue, Box 14

Anchorage, AK 99513-7587
Fax: 907-271-2851
Email: Venus.Larson@faa.gov



Location & Vicinity Map

Sitka SPB Environmental Assessment

DOWL

Date: November 13, 2019

Figure 1

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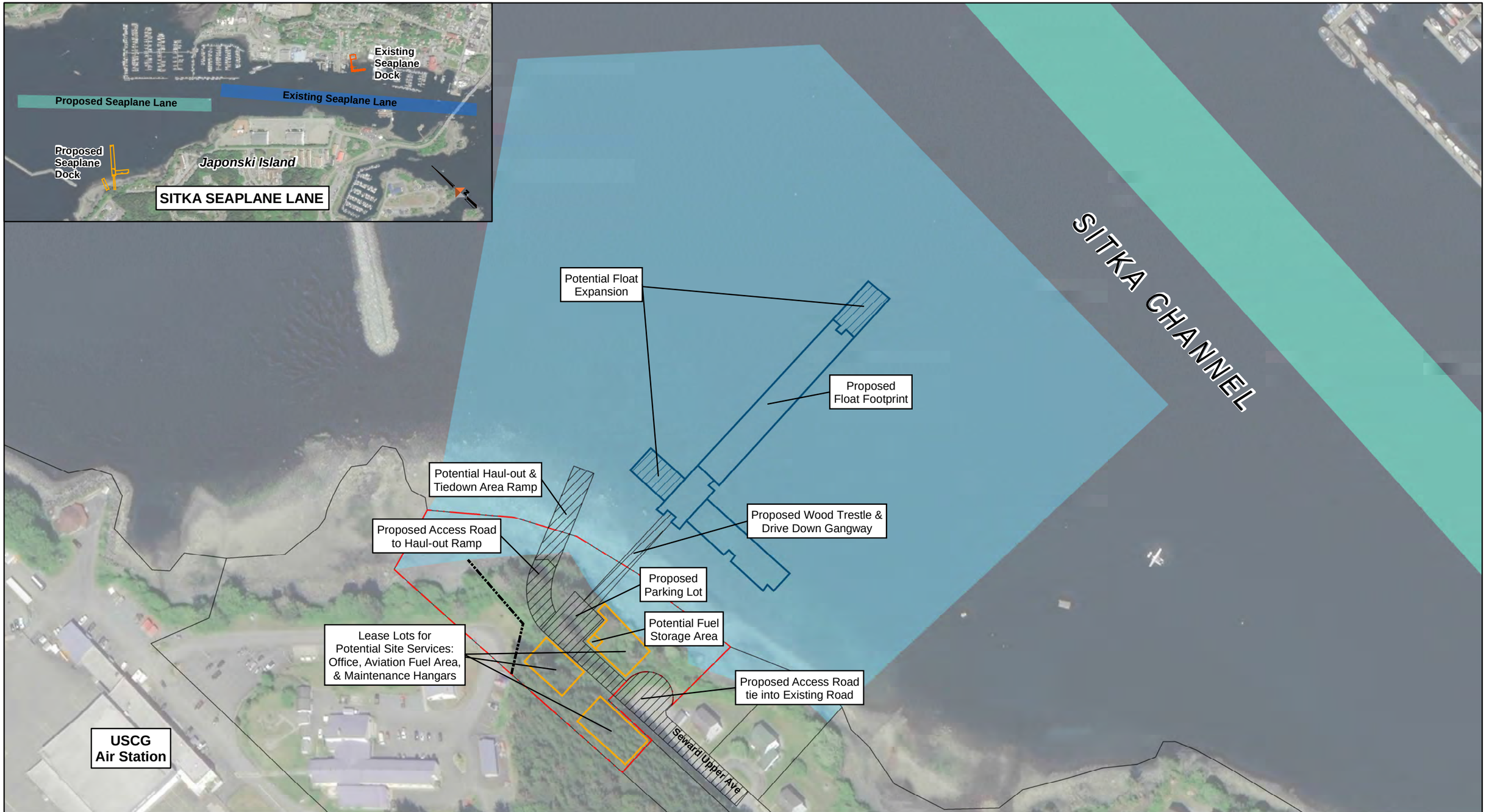

Project Concept

- Float Layout
- Lease Lot
- Parking & Access
- Potential Expansion
- LOT 15A Boundary
- Future Seaplane Lane
- Water Operation Area

Existing Conditions

- Existing Seaplane Lane
- City of Sitka Parcel Boundary
- USCG Fence Encroachment

0 100 200
Feet

N

Preliminary Design

Sitka SPB Environmental Assessment

DOWL

Date: November 20, 2019

Figure 2

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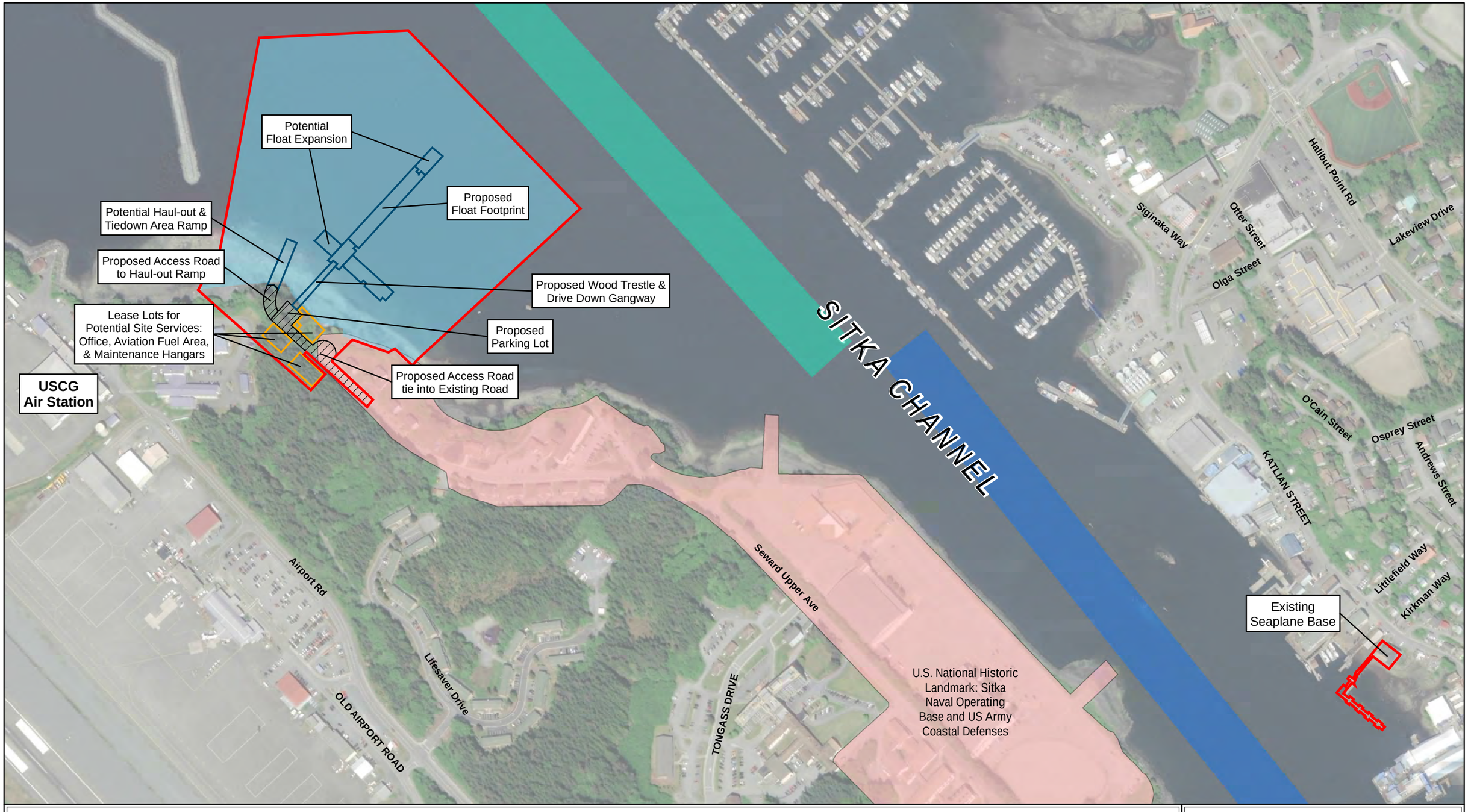
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Preliminary Project Elements

- Float Layout
- Potential Service Area
- Parking Lot and Road Expansion
- Proposed Seaplane Lane
- Water Operation Area
- Preliminary APE

Existing Conditions

- US National Historic Landmark*
- Existing Seaplane Lane

As mapped in AHRS

0 200 400
Feet

N

Preliminary APE

Sitka Seaplane Base Planning & EA

DOWL

Date: November 20, 2019

Figure 3

Q:\23\63021-01\60GIS\ENV\Preliminary APE.mxd Nov 20, 2019 9:26:00 AM User: tjameson

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

FAA/CBS Edits to Sitka SPB EA based on STA Comments

The following edits were made to the EA based on STA comments.

Added into Section 1.0 Introduction

The Island was home to the Tlingit Indians before its settlement by Russians in the mid-eighteenth century.

Added into Section 3.6, Table 3

Historical, Architectural, Archaeological, and Cultural Resources	The Proposed Action would also impact an area that was historically occupied by the Tlingit. The area was used for subsistence harvests of marine resources by Sitka Tribe of Alaska members. The Proposed Action would develop this area and change the marine habitat along the shoreline. Consultation with Sitka Tribe of Alaska is underway regarding archaeological and tribal monitoring during ground disturbance and inadvertent discovery plan protocols.
Noise and Noise-Compatible Land Use	The new facility is likely to result in more aircraft operations in Sitka Channel which will result in more noise generated from seaplane operations. Long-term average noise levels are not expected to exceed land use compatibility standards nor would maximum noise levels from individual aircraft operations increase. The number of operations and frequency of noise events may increase and could increase annoyance in areas near Sitka Channel. A Fly Friendly program would be developed by CBS in coordination with adjacent land owners and pilots to minimize noise impacts to the extent practicable. Traffic would increase on Seward Avenue increasing the frequency of traffic noise events at facilities along Seward Avenue. Short-term construction noise effects would be mitigated through marine staging for materials and a blasting plan to include mitigation measures to minimize impacts on adjacent properties.
Children's Health and Safety Risks	Adjacent uses include clinical facilities for outpatient behavioral health treatment. Maximum noise levels inside clinics are unlikely to change substantially but individual aircraft noise events causing annoyance may occur more often. Noise levels at the school and clinical facilities would remain within land use compatibility standards. Vehicle traffic would increase but is unlikely to result in any substantial increase in safety risks.

Added into Section 4, General Setting

Evidence for human habitation of the Northwest Coast dates to 12,500 years before present. Sitka is part of an expansive territory occupied by the Tlingit, and takes its name from Sheey At'iká (or Sheet'tká) Kwaan, whose territory extends the full length of the Pacific coast of Chichagof Island (Point Urey) to the southern tip of Baranof Island (Cape Ommaney), inclusive of small islands off the coast.

The Southeast Alaska Regional Health Consortium (SEARHC), a non-profit health consortium serving Southeast Alaska residents, has several facilities along Seward Avenue, including behavioral health clinics, administrative facilities, and Mount Edgecumbe Medical Center, the major hospital in the Sitka area and serving much of Southeast Alaska. SEARHC owns much of the land south of the proposed site and is proposing a new hospital on the northwest corner of Seward Avenue and Tongass Drive across the street from the current hospital.

Added into Section 5.4, Historical, Architectural, Archaeological, and Cultural Resources

Affected Environment

Tlingit History

Evidence for human habitation of the Northwest Coast dates to at least 12,500 years before present. Sitka is part of an expansive territory occupied by the Tlingit and takes its name from Sheey At'iká (or Sheet'tká) Kwaan. The temperate climate and abundant plant, game, and marine resources contributed to development of the complex Tlingit sociocultural system, intricate artistic traditions, and far-reaching relationships outside of Tlingit territory. Of the Tlingit in Southeast Alaska, the Sheet'tká Kwaan had the most (and likely the earliest) contact with Europeans, with contact possibly occurring as early as 1584, and documented by Russian sailors in 1741 (Grinëv et al, 2005). The perils of European contact, ensuing armed conflict, and eventual purchase of Alaska by the United States Government led to displacement, competition for resources, and disease. These effects of contact took a heavy toll on the Tlingit population.

Despite generations of social and cultural changes, the Tlingit continue to have a prominent presence in the community as they practice the same subsistence, cultural, and artistic traditions that have been ongoing for thousands of years. Today, the Sitka Tribe of Alaska is the federally recognized government for the immediate local indigenous population (inclusive of Tlingit, Haida, and Tsimshian members), along with the Central Council of Tlingit and Haida Indian Tribes of Alaska, which is headquartered in Juneau.

The Project area and broader vicinity have been used by the Tlingit for gathering shellfish (including abalone) and other marine resources for generations. Sites associated with Tlingit in the vicinity of the project include the Mt. Edgecumbe School (SIT-00648) which was determined eligible by the BIA, and possibly (SIT-00478), a grave site which is recorded in the AHRS as being of uncertain patrimony. Discussions with Sitka Tribe of Alaska have indicated that there are Tlingit graves in the vicinity of the Project (between the USCG base and the airport), and it is possible that SIT-00478 may represent one such grave. Sitka Tribe of Alaska members have also shared reports of human remains on the beach in historic times, although none were observed during site visits.

Although there are no prehistoric or historic-era Tlingit sites documented within the Study area, the Tlingit generations-long use of the broader vicinity for subsistence, and the presence of historic-era sites indicate a possibility that previously undocumented sites may exist in the vicinity of the Project.

Environmental Consequences

Tlingit Cultural Uses and Resources

Discussions with Sitka Tribe of Alaska have indicated that there may have been human remains on beaches in the vicinity in the past and there are burials in the vicinity of the project (between the USCG base and the airport). Sitka Tribe of Alaska did not identify any burials within the Study Area; however, the proximity of the Study Area to known burial sites and identified subsistence use areas creates potential for inadvertent discoveries of, or inadvertent adverse effects to, Alaska Native cultural resources.

Development of the site and nearshore waters will reduce the shoreline areas available for subsistence harvests of marine resources. However, the areas used for subsistence harvests around Sitka is extensive (Still and Koster, 2017). Therefore, restricted access to this particular portion of the shoreline would not substantially impact subsistence harvest potential. A tidal survey done during the planning phase found no abalone present in the area to be affected.

Minimization and Mitigation

Consultation with Sitka Tribe of Alaska is underway to address archaeological and tribal monitoring during ground disturbance on the site and inadvertent discovery plan protocols. As noted above, Section 106 consultation is also underway to determine appropriate mitigation measures to be implemented to address the adverse effect to the observation post (SIT-01115).

Consultation, Permits, and Other Approvals

Consultation to resolve adverse effects under Section 106 of the NHPA has been initiated with the NPS, Alaska SHPO, Sitka Tribe of Alaska, and Sitka's Historic Preservation Committee (see Section 6.2, Section 106 Consultation, for a list of recipients). Since the SHPO has determined that the observation post is eligible for the NRHP as a contributing element of the NHL, consultation is underway to determine appropriate mitigation measures to be implemented to address the adverse effect. Potential mitigation measures may include documentation of the structure through the Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER), use of interpretive signage documenting the observation post and its use in WWII, documentation of another similar structure on the island, or other measures.

The Sitka Tribe of Alaska has provided input regarding the potential for artifacts and/or human remains to be present on the site. Consultation is underway regarding an inadvertent discovery plan and notification process and tribal monitoring during ground disturbance.

Consultation currently underway with appropriate parities will identify specific mitigation measures and responsibilities in a Memorandum of Agreement (MOA) prior to any site disturbance.

Added into Section 5.8, Noise and Noise-Compatible Land Use

Affected Environment

Japonski Island contains Sitka's commercial airport and the USCG's Air Station Sitka, which conducts search and rescue operations in Southeast Alaska. The existing seaplane base is located south and east of the proposed site. Seaplanes currently take off and land on Sitka Channel from the existing seaplane base south and east of the proposed site.

Noise-sensitive receptors, such as Mount Edgecumbe High School, SEARHC health care facilities, student dormitories, and a school staff residence are located on Japonski Island in the vicinity of the site. It has been reported that existing seaplane operations in the channel sometimes interfere with class activities at Mount Edgecumbe High School and activities in the SEARHC facilities.

Aircraft operations were estimated based on interviews and surveys of pilots that had signed papers indicating interest in basing aircraft at the new seaplane facility. Most pilots indicated that they would use their aircraft only seasonally for private use, but there were three pilots that would potentially provide commercial service. Based on the surveys and interviews, peak day operations were conservatively estimated at 92 operations (Table 8). This assumes that all aircraft operators and transient operations were operating on the peak day, which is unlikely and therefore conservative.

Table 8. Estimated Peak Day Aircraft Operations

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

Transient Slips (4)	Either		600	300	8
Peak Day Operations					92

Environmental Consequences of the Alternatives

Noise impacts from the proposed Project were evaluated with consideration of Yearly Average Day-Night Noise Levels (DNL) and land use noise compatibility guidelines. This noise metric averages aircraft sound levels over a 24-hour period based on the number of events and the time period in which they occur. Most land uses (including residential, schools, and health care facilities) are compatible with DNL levels of 65 decibels (dB) and below.

FAA environmental review guidance does not require noise analysis for Projects involving Design Group I and II airplanes, such as Cessna and Beavers, when these operations do not exceed 90,000 annual (247 average daily) operations. However, due to the proximity of Mount Edgecumbe High School at the water's edge and other potentially noise sensitive uses in the project vicinity, a noise analysis was conducted.

A screening level analysis was conducted using FAA's Area Equivalent Method Version 2C SP2. The model provides a comparison of existing to future average noise levels by calculating the increase in the footprint of the 65 dB DNL contour. Based on the expected increase in the number of flights and an increase in the number of louder aircraft, the screening analysis indicated that a more detailed method should be used for calculating impacts at noise sensitive receptors. Detailed analysis was performed using FAA's Aviation Environmental Design Tool AEDT version 3C. Appendix E contains a summary of the noise analysis performed. Table 9 below shows the noise level calculated at selected receptors for a peak activity day (assumed to be in the summer) and Figure 11 shows the noise contours based on peak day operations.

Table 9. Future Estimated Average Noise Levels at Noise Sensitive Locations

Receptor ID	Receptor Name	Noise Level (dB)	Noise Metric
1	Mount Edgecumbe HS	64	DNL
2	Mount Edgecumbe Student Housing	59	DNL
3	SEARHC Hospital – Existing Location	56	DNL
4	SEARHC Hospital – New Location	58	DNL
5	SEARHC Community Health Services	57	DNL
6	Buildings at 1200-1202 Seward Avenue	58	DNL

Seaplane takeoff and landing operations would still occur in the Sitka Channel, but may be shifted north of their current location. The new seaplane base would provide more float capacity and could increase the number of seaplane operations in the Sitka Channel from an estimated 1,043 per year to approximately 4,882 per year (an average of 13 per day). Use is seasonal and so daily operations would be higher in summer and lower in the winter. Peak-day operations are estimated at 92 operations.

The noise analysis shows that average noise levels for all sites are within the standard for land use compatibility (less than 65 dB DNL). Long-term noise levels are 64 dB DNL at the school based on peak operations, but peak operations are expected to occur in the summer when school is not in session. While long-term noise levels would be considered compatible based on land use compatibility criteria, there would continue to be some noise impacts on Mount Edgecumbe High School during individual takeoff events depending on the aircraft type, takeoff location, and weather conditions. Although the takeoff activities would be further from the school, there may be more operations on the channel. The maximum noise levels during a takeoff event would not be expected to change.

Noise levels at the various other facilities along Seward Avenue would remain below 65 dB DNL. Therefore the surrounding uses and activities would be considered compatible based on FAA land use compatibility criteria. As with

Mount Edgecumbe High School, the number of noise events is likely to increase, but the maximum noise level is not expected to increase. While below FAA criteria for land use compatibility, the increase in operations could result in more frequent annoyance for SEARHC employees and patients of the hospital and clinics.

The Proposed Action would also increase traffic on Seward Avenue, with a potential for a higher frequency of traffic noise events. Although traffic events would increase, overall noise levels are not expected to increase substantially as traffic would be spread out throughout the week and cars would be traveling at a slow speed on Seward Avenue. Therefore, there would not be a substantial increase in traffic noise volumes, particularly inside structures.

Temporary impacts to noise-sensitive receptors from construction activities, particularly blasting, are anticipated, but would be short term and end at construction completion.

Minimization and Mitigation

CBS has committed to developing a Fly Friendly program for the new seaplane facility. CBS would work with adjacent land owners and pilots to develop measures to minimize impacts to the facilities located along Seward Avenue. A construction blast plan would be developed and would incorporate measures to reduce the potential for adverse effects on structures along Seward Avenue. CBS intends to coordinate with NPS, SEAHC, and the ADEED on the blast plan.

FAA & STA

Government to Government Meeting

G2G Meeting Agenda

- Welcome/Introductions
- Project Background
- Tribal Concerns

CITY AND BOROUGH OF SITKA

New Sitka Seaplane Base

Project Background

Monday, November 22, 2021

Project History

- Facility Needs Assessment Completed

- Sitka Seaplane Base Master Plan
- Alternative analysis (13 sites) and site selection
- Japonski Island site selected

- Three sites re-evaluated:
  - Existing location
  - Eliason harbor
  - Japonski Island
- Japonski Island site selected

- Damage occurs to existing SPB
- Siting study updated
- Three sites re-evaluated
- Japonski Island site selected

The purpose of the proposed project is to address capacity, safety, and operational and condition deficiencies at the existing Sitka SPB.

Seaplane Base Needs

- Safety Concerns
  1. Bird hazards from fish processing wastes
  2. Boat conflicts
  3. Facility does not meet FAA standards
  4. Facility beyond useful life
- Operational Concerns
  1. Seaplane maneuvering restricted
  2. No upland facilities (fuel, parking)
  3. No expansion capacity

2015 storm damage was final straw

Seaplane Base Benefits

- Improved transportation services to/from regional communities for access to health services, retail services, educational services
- Economic benefits from increased access to recreation areas
- Economic benefits from increasing aviation employment (tour operators, flight instructors, aircraft mechanics, etc.)

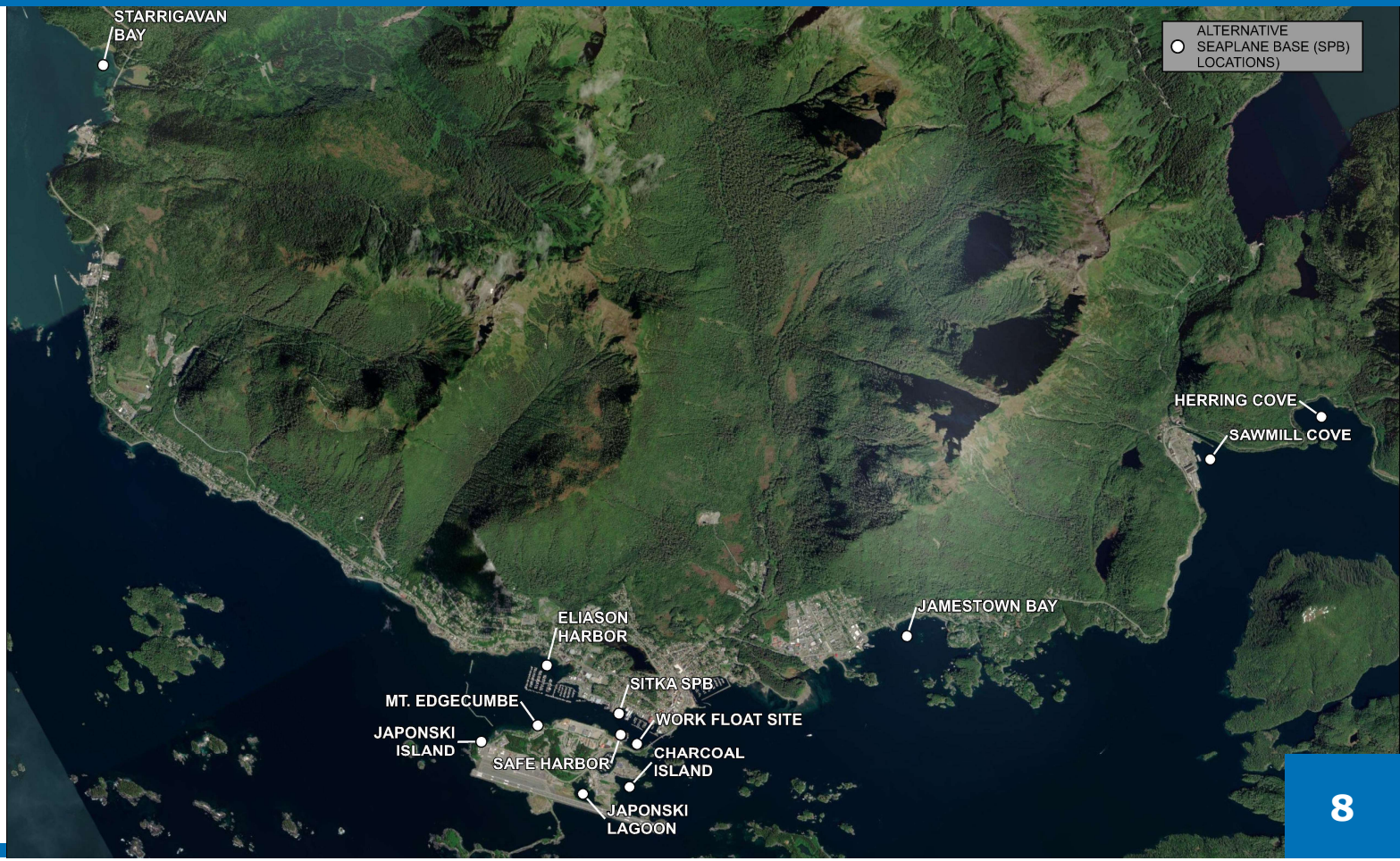
2002 SPB Master Plan – Sites Considered

Dismissed:

- Starrigavan Bay
- Mt. Edgecumbe
- Safe Harbor
- Work Float
- Japonski Lagoon
- Charcoal Island
- Jamestown Bay
- Sawmill Cove
- Herring Cove

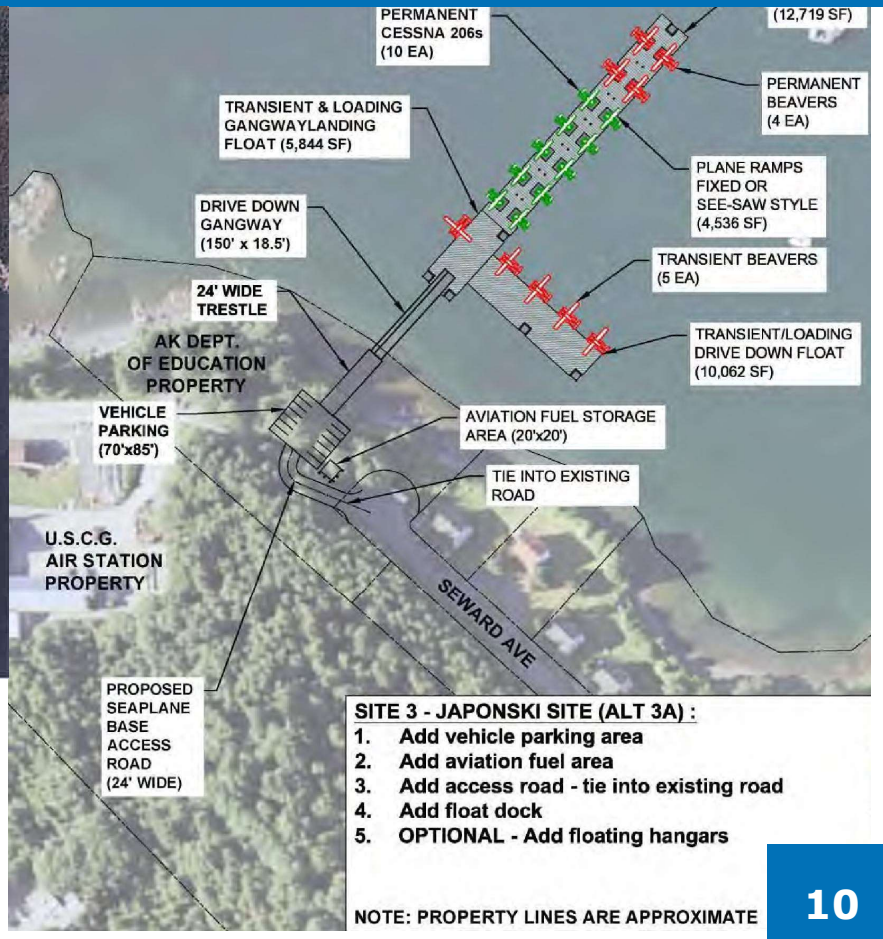
Carried Forward:

- Existing SPB Site
- Eliason Harbor
- Japonski Island



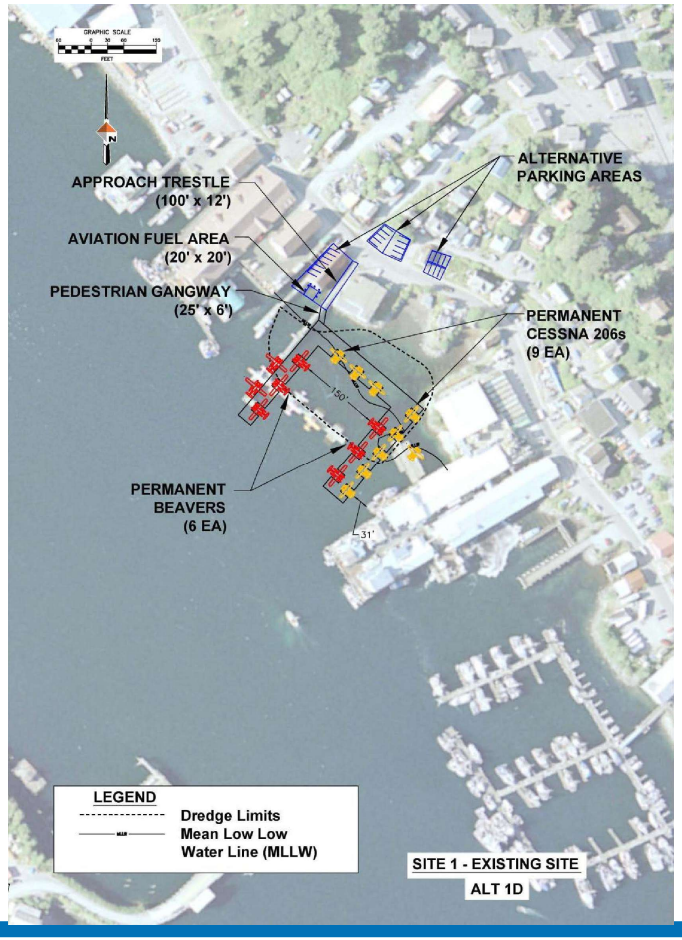
2002 SPB Master Plan – Sites Carried Forward

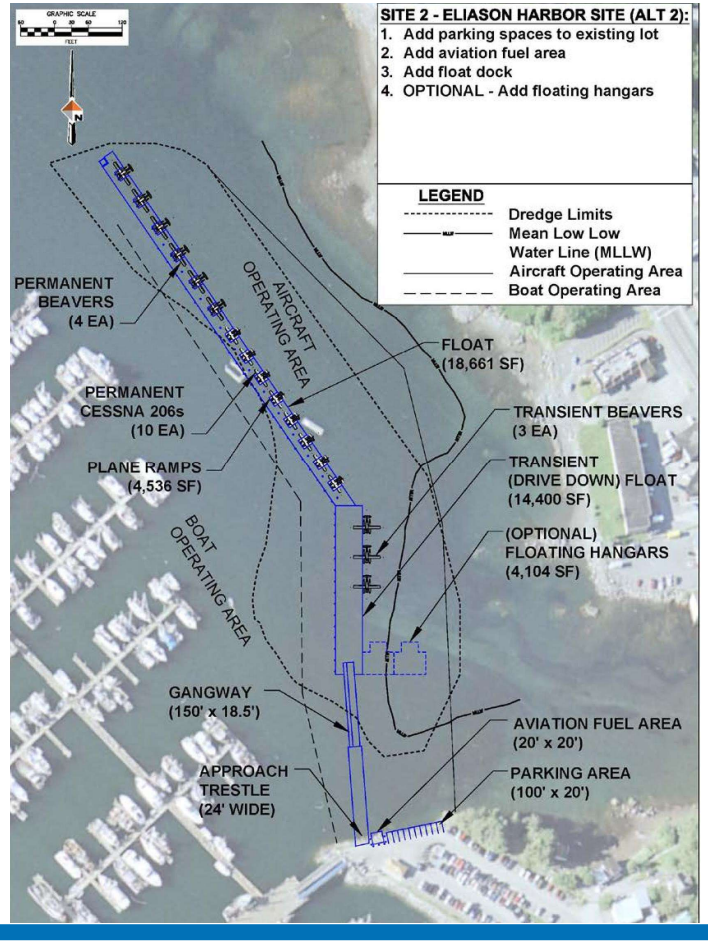
2012 Siting Analysis – Confirmed Site

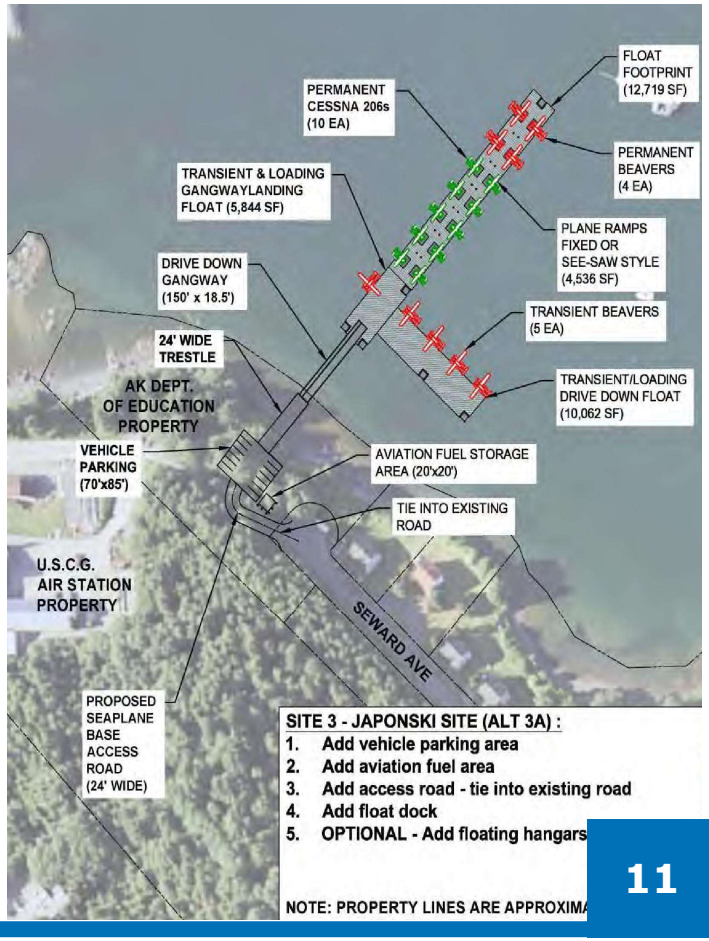


Re-evaluated feasible sites; recommended Japonski Island

2016 Siting Analysis Re-evaluation

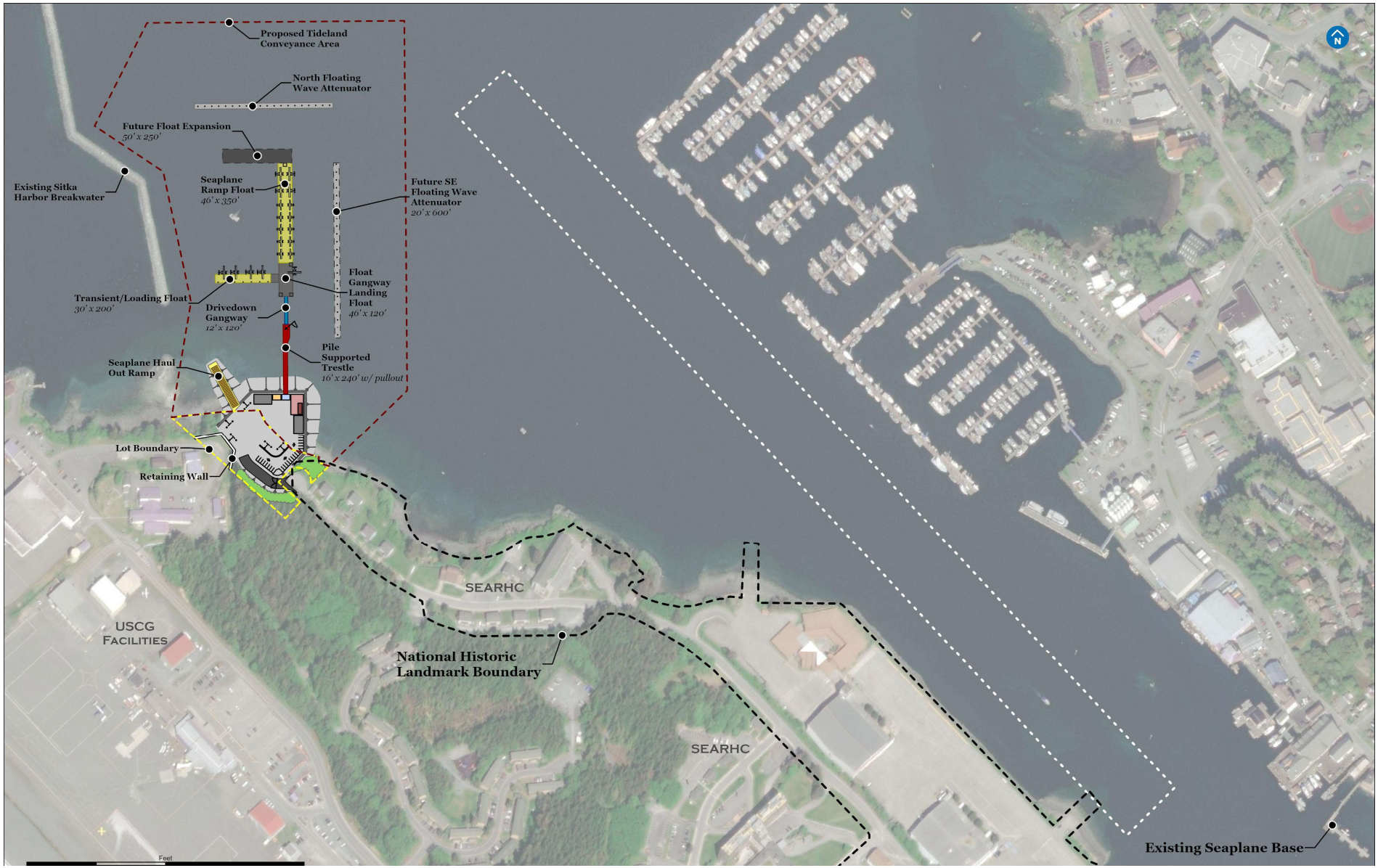


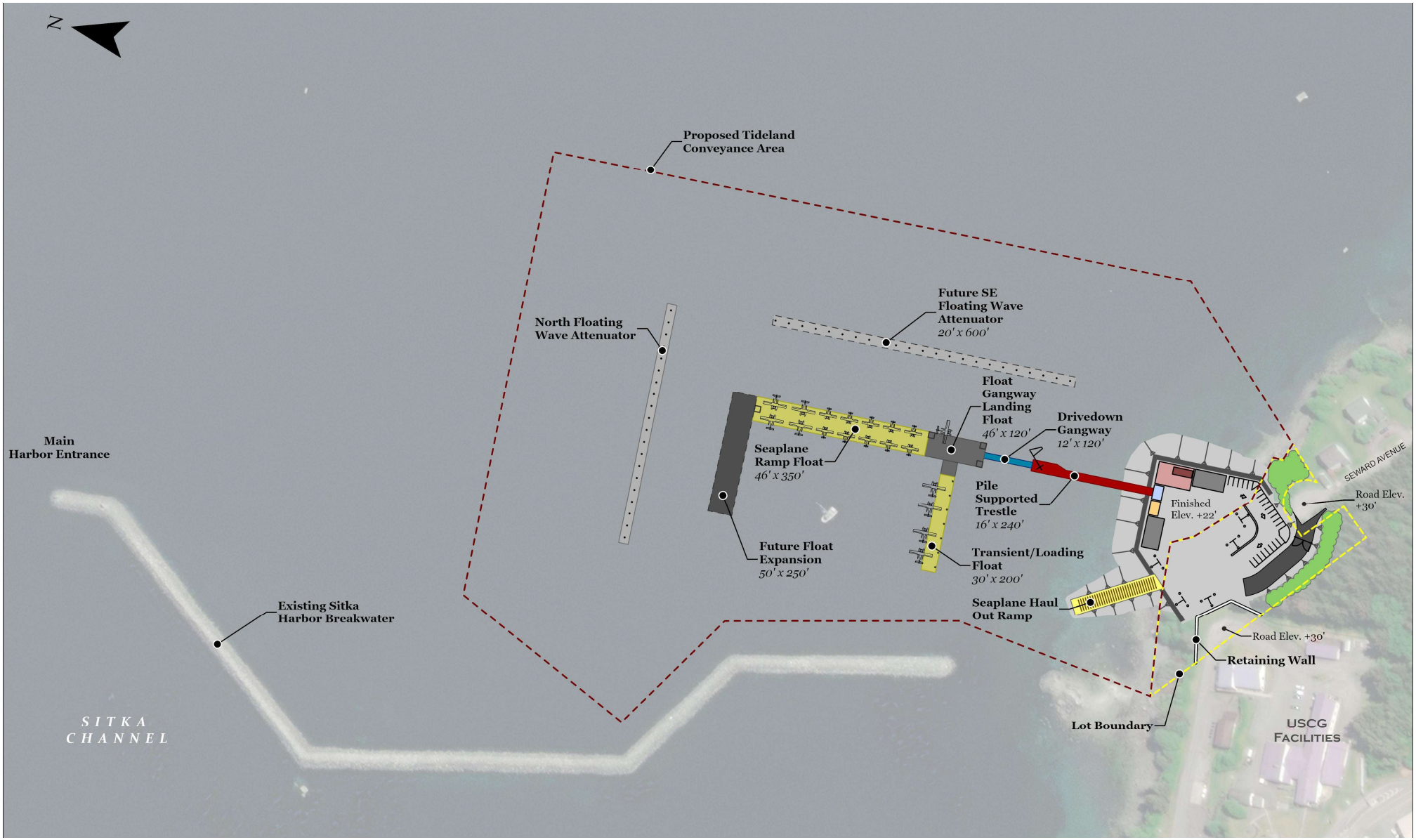




Sitka SPB Proposed Action

- ✓ Drive-down ramp to the SPB floats
- ✓ Electricity, water/sewer, and lighting
- ✓ Float slips for based seaplanes/ positions for transient seaplanes
- ✓ Future growth accommodation options
- ✓ Haul-out ramp, tiedowns, maintenance facilities
- ✓ Fuel storage and distribution system
- ✓ Covered shelter
- ✓ Security fencing and gate
- ✓ Retaining wall
- ✓ Access road sloping down into site
- ✓ Vegetation buffer


Proposed Tideland Conveyance Area
North Floating Wave Attenuator
Future Float Expansion
50' x 250'
Existing Sitka Harbor Breakwater
Seaplane Ramp Float
40' x 350'
Future SE Floating Wave Attenuator
20' x 600'
Float Gangway Landing Float
40' x 120'
Transient/Loading Float
30' x 200'
Drivedown Gangway
12' x 120'
Pile Supported Trestle
16' x 240' w/ pullout
Seaplane Haul Out Ramp
Lot Boundary
Retaining Wall
SEARHC
USCG FACILITIES
National Historic Landmark Boundary
SEARHC
Existing Seaplane Base
Feet


N
Proposed Tideland Conveyance Area
North Floating Wave Attenuator
Future SE Floating Wave Attenuator
20' x 600'
Float Gangway Landing Float
46' x 120'
Drivedown Gangway
12' x 120'
Seaplane Ramp Float
46' x 350'
Pile Supported Trestle
16' x 240'
Future Float Expansion
50' x 250'
Transient/Loading Float
30' x 200'
Seaplane Haul Out Ramp
Main Harbor Entrance
Existing Sitka Harbor Breakwater
SITKA CHANNEL
Finished Elev. +22'
SEWARD AVENUE
Road Elev. +30'
Road Elev. +30'
Retaining Wall
Lot Boundary
USCG FACILITIES

Tribal & Public Coordination

- ✓ FAA G2G letter and S106 Initiation – November 2019
- ✓ NEPA Scoping Meetings – Public and Agency – December 2019
- ✓ Information requested from STA on subsistence – December 2020
- ✓ Presentation to Sitka HPC – February 2021
- ✓ Public meeting on EA – February 2021
- ✓ STA Resource Protection Committee Meeting – February 2021
- ✓ Meeting with STA Council – March 2021
- ✓ Consultation on S106 MOA – April 2021
- ✓ Emails/calls regarding additional consultation – May-July 2021
- ✓ Consultation on S106 MOA – August 2021
- ✓ STA request for G2G meeting with FAA – October 2021

March 2021 Tribal Council Meeting Concerns

- Cultural Resources
  1. Inadvertent discovery plan for human remains or cultural resources
     - *CBS agreed to develop plan with STA coordination*
  2. Desire to be first notified of discovery of human remains
     - *CBS agreed to have tribal monitor on site during construction/soil disturbance*
  3. Request archaeologist on site during soil disturbance
     - *CBS agreed to have archaeologist and tribal monitor on site during construction/soil disturbance*
- Subsistence Resources
  1. Use fill free of arsenic – site is subsistence shellfish harvest area
     - *CBS agreed to use clean fill*
- Marine Mammals
  1. More information requested regarding number of piles, potential noise effects on marine mammals
     - *Details on piles and marine mammal effects provided in Biological Assessment*
- SEARHC Concerns
  1. Concerns in SEARHC letter (traffic and noise impacts on SEARHC facilities and programs)
     - *FAA & CBS addressed traffic and noise impacts on SEARHC facilities in Final EA*

Project Status

- Final EA and FONSI issued – June 2021
- Section 106 consultation underway/continuing (MOA to resolve adverse effects/address tribal concerns)
- Design grant received
- State tideland and submerged lands transfer approved
- Agreement with State to acquire uplands
- Final permitting to be completed with design details
    1. Clean Water Act (404 Wetland Fill/401 Water Quality Certification)
    2. Section 10 River and Harbors Act (Section 10 permit)
    3. Endangered Species Act (No Jeopardy Finding)
    4. Marine Mammal Protection Act (Incidental Harassment Authorization)

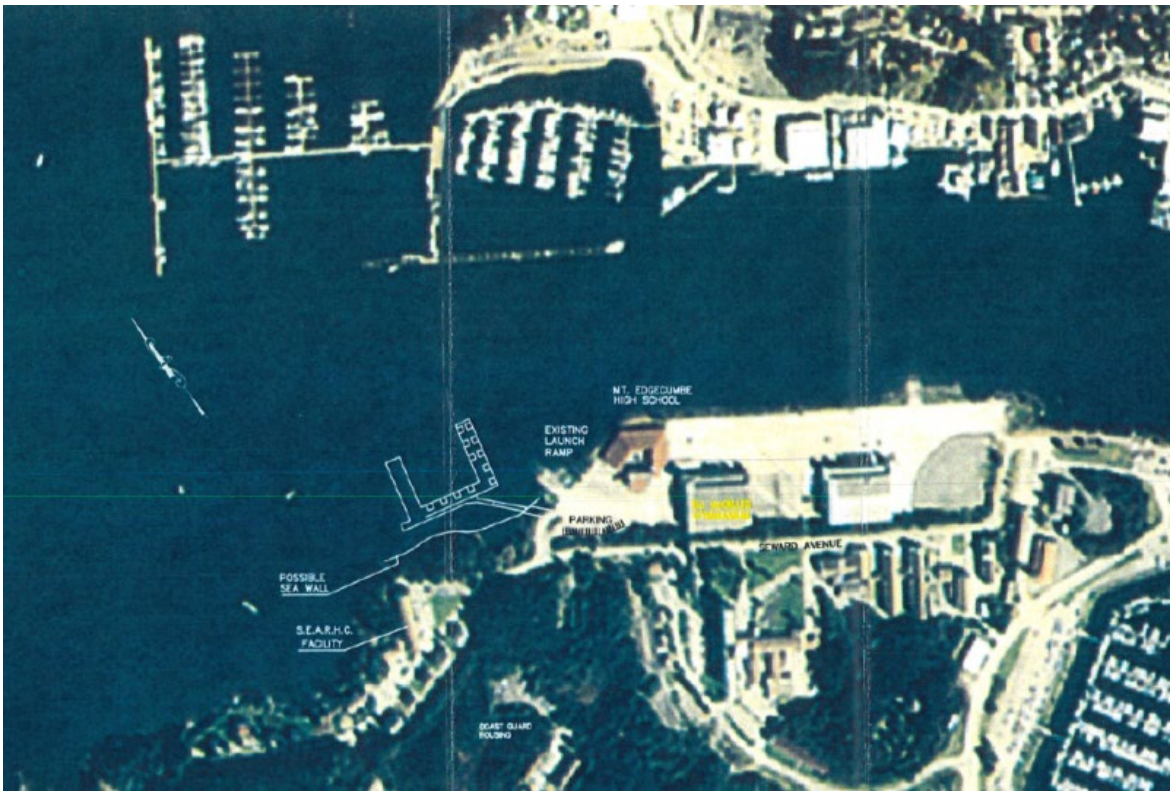
Dear Chairman Widmark:

Thank you for allowing us to attend the Government to Government (G2G) meeting between the Federal Aviation Administration (FAA) and the Sitka Tribe of Alaska (STA) on November 22, 2021. Although CBS was not an official participant in the FAA-STA G2G meeting, we would like to address some of the issues raised about the project history and recent processes.

Process Concerns and Assembly Action on FAA Design Grant. Some STA representatives indicated that they are surprised that the City and Borough of Sitka (CBS) Assembly approved a recommendation to accept the FAA design grant for the new Sitka Seaplane Base (SPB). We recognize that the long and complicated federal and local process for designing and approving a new facility can be confusing to those not familiar with them. There are many steps in the federal environmental and funding processes and a number of local approval processes as well. Our continuation of our funding and planning processes was not intended as a slight to our ongoing consultation process with STA. We are committed to continuing to work with you to address your concerns but must also continue our funding process to secure federal grants for the new seaplane base as it is critical infrastructure for our community and the region.

During the G2G meeting, a participant indicated that Mr. Harmon had misrepresented STA's concerns about the project and misled the Assembly by indicating that there were no concerns. There was concern expressed that the Assembly was not aware of letters from STA and the Marine Mammal Commission opposing the project site. After listening to a recording of the meeting, the FAA SPB design grant acceptance discussion item received the most public input and Assembly discussion of any item on the agenda that night. Several people associated with the tribe, SEARHC, and SEARHC programs spoke regarding their concerns about potential noise from the proposed SPB. Mr. Harmon informed the Assembly that the City was in consultation with the tribe and others and trying to address the concerns raised. He added that he believed that STA did not completely oppose the project, but had raised concerns that needed to continue to be addressed. This was the impression that we had after the March 2021 meeting with the Tribal Council. I do not believe that he intended or did mislead the Assembly regarding the issues. In fact, the Assembly heard public testimony about the concerns that night and asked many questions about the project. In the end, the Assembly approved the receipt of the design grant to allow the project to move into the design phase, given the importance of the project to the community.

CBS Alternatives Analysis Process. A tribal member proposed that CBS evaluate locating the SPB near the USCG dock in Sitka Channel, across from the current SPB location. CBS representatives discussed the long alternative analysis history, starting in 2000. Locations outside the channel were eliminated primarily due to their exposure to wind and wave actions and steep terrain. Several locations within the channel were also evaluated, including the area suggested at the G2G meeting. This was evaluated in the alternatives analysis in 2002 as shown below. In addition to the 2002 alternatives analysis, CBS officials also evaluated sites in the channel south of the 2002 Mt. Edgecumbe School location toward the bridge. These sites were not carried forward, as the channel gets narrower and more congested to the south of the school. Placing seaplane floats out into the channel between the Mt. Edgecumbe School and the bridge is not feasible or prudent due to conflicts with USCG access to their dock, higher boat traffic near the [name?] fueling facility, and hazards associated with takeoffs and landings closer to the bridge. There are no uplands available to support the SPB at this location.



In addition, this location would result in increased noise on Mt. Edgecumbe School and dorm. It would not decrease the overall noise levels in the SEARHC facilities area. By moving the facility to the north, takeoffs and landings would shift somewhat north, reducing overall noise levels in the Mt Edgecumbe School area and the hospital location.

Regardless of the location of the floats within Sitka Channel, takeoffs and landings would have to take place in the channel.

I was very surprised that an STA member stated that she had lived in Sitka for a long time and had never heard about this project until now. Since 2001, there have been numerous public meetings and newspaper articles about CBS's efforts to locate and construct a new seaplane base. [STA has been involved in these studies and in the past has indicated support for moving the seaplane base away from the STA headquarters building??]

Marine Ecosystem and Subsistence Impacts. While CBS is not aware of any letter from a Marine Mammal Advisory Committee opposing the new seaplane base location, CBS has been working with the National Marine Fisheries Service (NMFS) to address potential impacts to the marine ecosystem. While we cannot guarantee that there would be no impacts to marine mammals and fish, the project is being designed in coordination with NMFS to minimize potential impacts on marine resources and we believe NMFS will approve our planned mitigation measures.

CBS and their consultant team did reach out to the STA Resource Protection Director during the environmental analysis to obtain information on the tribe's use of marine resources for subsistence and concerns to be addressed. The response was that there were no concerns about impacts on the marine mammals or their harvests, but that pile driving should be prohibited between March 15 and May 31 to

minimize impacts on herring. There was also a request that tribal citizens be considered for marine mammal monitoring positions.

Potential for Noise/Traffic Impacts on SEARHC Programs and Facilities. CBS is aware of SEARHC's concerns that increased noise and traffic from the seaplane base will adversely impact programs and facilities. The environmental review acknowledges that there will be more noise and traffic on Seward Avenue and in the channel. However, the levels of noise and traffic are consistent with standards for compatible land use and traffic planning. CBS would like to work with SEARHC to collaboratively identify feasible measures to minimize impacts from the seaplane base. However, we do believe that the site identified is the best site for the facility.

While we originally identified a new access road to the seaplane base site through U.S. Coast Guard (USCG) properties north of Tongass Drive, the USCG opposed a new road through their lands as it would separate their housing area from their base.

Continued Consultations. As you have noted at our meetings, we believe that CBS and STA can successfully work together to address concerns regarding the new seaplane base. However, CBS has conducted a very long and thorough analysis on siting the seaplane base and we believe that the site proposed in the only site that meets our needs for this critical community infrastructure. We hope to work with you to identify feasible measure to minimize any adverse effects of this important project.

Sincerely,

John Leach, City Administrator
City & Borough of Sitka

Cc: Jack Gilbertsen, FAA

From: Gilbertsen, Jack (FAA)
Sent: Tuesday, August 30, 2022 9:51 AM
To: Ponozzo, Kristi M (FAA)
Subject: FW: Reinitiating G2G Consultation between STA and FAA, Regarding Sitka Seaplane Base's Reconstruction Project.

FYI

From: Gassman, Lisa <lisa.gassman@sitkatribe-nsn.gov>
Sent: Monday, May 2, 2022 1:02 PM
To: Gilbertsen, Jack (FAA) <jack.gilbertsen@faa.gov>
Cc: jeff.feldpausch@sitkatribe-nsn.gov; Warden, Kristi (FAA) <Kristi.Warden@faa.gov>; Gordon, Keith (FAA) <keith.gordon@faa.gov>
Subject: Re: Reinitiating G2G Consultation between STA and FAA, Regarding Sitka Seaplane Base's Reconstruction Project.

Thank you for the update. Connecting after your re-review is complete sounds fine. We can discuss potential dates for you to come to Sitka at that time.

Lisa Gassman
General Manager

Sitka Tribe of Alaska
204 Siginaka Way
Sitka, AK 99835
(907) 747-3207 General * (907) 747-7380 Direct Line * (907) 738-8832 Cell
lisa.gassman@sitkatribe-nsn.gov <lisa.gassman@sitkatribe-nsn.gov>

On Fri, Apr 22, 2022 at 2:53 PM Gilbertsen, Jack (FAA) <jack.gilbertsen@faa.gov> wrote:

> Hi Jeff and Lisa,
>
> I tried calling you yesterday and today to reintroduce myself on behalf of the FAA Alaskan Region Airports Division, but your receptionist conveyed you were out of the office. Please accept my email reintroduction instead.
>
> FAA is excited to say that we are finally back in the office, our team is all together again, are we are eager to resume the G2G discussion that we last held on Zoom, back in November 2021.

I'm attaching the FAA's response to Chairman Widmark's letter, also dated Nov 2021, in which we outline the steps we have been taking to respect your sovereign, Tribal concerns. Specifically, in response to your objection to Sitka Seaplane Base's current site selection, we are undertaking a deep reevaluation of all the originally proposed sites, as well as us being open to any new locations that may not have been previously considered or available. In our response letter, we have shared with you the list of the criteria we are using to reevaluate sites, and we are asking you for your suggestions and preferences so we can hear your voice as we weigh our options. Likewise, we have elevated your concerns and your voice to our Headquarters in Washington, DC, to ensure you receive the highest considerations our agency can offer.

Regarding how best to reengage. I would like to proceed by reconnecting with you by phone, email, or Zoom; and when our re-review is complete, my Director, Kristi Warden and I would like to travel to Sitka so we can meet with you in-person, present our results to the Chairman and the Tribal Council, and we can personally convey our gratitude for the patience you all have shown us while our COVID-19 policies have challenged our operational capabilities and social distancing has kept us apart.

It is my understanding from CBS's Kelli Cropper that stakeholders are working together to create an MOA for Tribal Monitoring and Inadvertent Discoveries, so that whatever the outcome our reevaluation yields, we can move forward preventing any disruption of service and protecting the Sitka public's needs. FAA thanks STA for your good-faith efforts and cooperation regarding this matter.

Please, contact me with questions or comments, and I look forward to resuming our consultation soon.

Regards,

Jack

Jack L. Gilbertsen, REM

Lead Environmental Protection Specialist

Alaska Regional Office
Federal Aviation Administration
(907) 271-5453

U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

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

April 20, 2022

Lawrence Widmark, Chairman
Sitka Tribe of Alaska (STA)
204 Siginaka Way
Sitka, AK 99835

Re: Sitka Seaplane Base Reconstruction G2G Tribal Consultation Continuation

Dear Chairman Widmark and Tribal Council Members,

The FAA regrets the long time it has taken to respond to your correspondence, dated November 23, 2021. We want you to know the time you waited was not spent idly. Internal discussions have been ongoing regarding the concerns you clearly expressed in your letter. These were not simple questions or quick answers, so we sought oversight from FAA Headquarters in Washington, DC, to ensure your concerns received the highest level of consideration our agency can offer.

We also want you to know that in the time that has passed since our last G2G meeting, the Sitka Seaplane Base Reconstruction Project has remained in the planning phase, operating under a documented categorical exclusion (CATEX) for up to 65% design completion. Onsite geotechnical investigation is the only ground disturbance currently authorized so that critically-needed site characterization data may be collected in order to enable accurate architecture and engineering (A&E), planning, and design. No actual construction has yet been authorized or funded by the FAA.

In direct response to your sovereign concerns, FAA understands the Sitka Tribe of Alaska (STA) is requesting FAA withdraw our support for the current project and for the City of Sitka (CBS) to choose a different location. We also appreciate the reasoning and details you voiced to us and we would like to provide an explanation of what we are doing in response to your request.

The FAA hears most clearly that finding an alternate location would resolve many of your concerns. To that effect, we have requested CBS revisit their alternatives and take a deeper look to see if there are any other possible sites that could be viable. FAA intends to re-evaluate the project's site selection with an open mind, truly taking the Tribe's concerns into consideration.

For transparency, we want to share with you that an impartial, fresh set of eyes is taking on this reevaluation, as no one on the current team was involved in making the previous selection. We also want to share some insight into our criteria for determining a selection, which includes the following:

- Must be available to purchase
- Must be on an existing roadway
- Must have favorable wind conditions
- Must be protected from harsh waves and sea swells
- Must have adequate depth, with no obstacles such as rocks
- Must not be in proximity to wildlife attractants
- Needs to have room for expansion over current facility
- Land component needs to have favorable topography and space for parking
- Needs to have room to maneuver safely
- Needs to have favorable traffic
- Costs must be reasonable
- Historic, cultural, and natural resources; including wildlife must be reviewed under strict adherence to NEPA in consultation with each authority having jurisdiction (SHPO, DNR, USACE, USFWS, NOAA NMFS, etc.)

Alternative candidate sites CBS has provided so far include:

- Current Seaplane Base
- Current Selected Site
- Mt. Edgecumbe
- SEARHC Cove
- Japonski Lagoon
- Eliason Harbor
- Charcoal Island
- Work Float
- Safe Harbor
- Jamestown Bay
- Herring Cove
- Sawmill Cove
- Starrigavan Bay

Ultimately, the results of this site selection reevaluation will be addressed and documented in a Supplemental Environmental Assessment (EA).

If a viable alternate is found, FAA resolves to convene a follow-on G2G with you to discuss the new site for its own merits and to directly seek your concerns. However, if a better site fails to avail itself, we will need to return to the difficult task of mediating a solution that will benefit the common good, as NEPA's and G2G's spirits intend.

Clarifying Guidance Question

To help us indelibly incorporate your concerns into our site selection process, the FAA would like to ask STA: "Are there any candidate sites the Tribe strongly prefers or opposes?"

Conclusion

Understanding STA's opposition to CBS's present chosen site, the FAA regrets that the urgent necessity of building a new seaplane base has forced a difficult situation on everyone to whom Japonski Island is dear. We sincerely hope that through our continued G2G we can communicate with each other and find common ground to steer this project with a sense of community and equity.

We are sincerely looking forward to meeting you in-person next time to discuss our path forward. Please, accept our apologies again for the length of time it has taken us to present this response.

Please contact our Lead Environmental Specialist, Jack Gilbertsen, with your response or if you have any questions or comments, at (907) 271-5453 or email jack.gilbertsen@faa.gov

Sincerely,

Kristi A. Warden
Director, Alaskan Region Airports Division

cc: Lisa Gassman, STA, General Manager
Jeff Feldpausch, STA, Resource Protection Director

From: Ponozzo, Kristi M (FAA)
Sent: Friday, October 28, 2022 9:07 AM
To: Gassman, Lisa; Feldpausch, Jeff
Cc: Lawrence Widmark
Subject: RE: FW: Re: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation

Ms. Gassman,

Thank you for your response and to Chairman Widmark for his time talking with me last week. I also looked over the Sitka Tribe of Alaska's letter to Kelli Cropper dated March 4, 2021, and spoke to staff within the FAA about the consultation on November 22, 2021.

Let me please emphasize something to start. Since the Federal Aviation Administration and the Sitka Tribe of Alaska (STA) met on November 22, 2021, the project management team both on the side of the FAA and the sponsors at the City and Borough of Sitka have had significant staff changes. Many of us are new to this project and bring with us new perspectives and a desire to hear directly from the STA. To that end, we remain open to recommendations and discussion on identifying alternative sites and/or recommendations and discussions or information provided from the STA specific to the siting criteria used to further evaluate current or additional sites.

As relayed to me by those who attended the consultation last year, we had a productive meeting that canvassed a broad range of topics. The STA identified at least one potential alternate site. The historical importance of Japonski Island was discussed at some length, as were concerns about the changing landscape and road and traffic impacts. The STA touched on concerns about wildlife and mentioned sea otters and whales in particular. Certain STA members said the noise from the seaplane base would be extreme, and pointed out that the new seaplane base was near a school and hospital. At least one person wanted more information about pile driving. We heard that the STA strongly desired a different site.

Regarding noise specifically, we are refining the noise analysis, about which the STA has raised concerns. We would like to share that revised analysis with the Tribe when it is complete.

We believe there is merit in continuing communication. Additional consultation with the STA could include exploring options such as adaptive management and/or STA monitoring of the proposed project, for example.

We would like to keep the door open for continued consultation with the STA, in whatever form is most acceptable for the STA. I appreciate all of your time and effort in involvement of this proposed project.

Thank you,

Kristi Ponozzo
Environmental Protection Specialist
Alaskan Region Airports Division
222 West 7th Avenue, MS #14
Anchorage, AK 99513
907-271-3665
Kristi.M.Ponozzo@faa.gov

From: Gassman, Lisa <lisa.gassman@sitkatribe-nsn.gov>
Sent: Thursday, October 20, 2022 3:43 PM
To: Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
Cc: Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov>; Lawrence Widmark <lawrence.widmark@sitkatribe-nsn.gov>
Subject: Re: FW: Re: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation

Hello,

Thank you for reaching out. I also received the voicemail you left requesting to meet. Our Council provided their input on the proposed site and the FAA is moving forward regardless of the Tribe opposing, so at this point, I don't see a reason to meet again unless that has changed? We would just ask that you keep us updated in writing as to what is happening so we can keep our council informed. I have added our Chairman to this email as well.

Thanks.

Lisa Gassman
General Manager

Sitka Tribe of Alaska
204 Siginaka Way, Suite 300
Sitka, AK 99835
(907) 747-3207 General * (907) 747-7380 Direct Line * (907) 738-8832 Cell
lisa.gassman@sitkatribe-nsn.gov <lisa.gassman@sitkatribe-nsn.gov>

On Fri, Oct 14, 2022 at 9:27 AM Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov> wrote:

> Good Morning Kristi
>
> I forwarded your email to Chairman Widmark and talked with Lisa about a response. She gave approval to share the Chairman's contact information listed below.

woody.widmark@sitkatribe-nsn.gov
907-752-0152

If you're not able to make contact with the Chairman let me know and I'll see what I can do.

Jeff

On Fri, Oct 14, 2022 at 9:11 AM Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov> wrote:

> Jeff and Lisa – I realized is did not send this to both of you, so am sending again to Lisa as well. You are the two contacts I have in my file for this project, so please let me know If I need to reach out to anyone else. I have also sent a hard copy of this letter to Chairman Widmark.
>
> Kristi Ponozzo
>
> Environmental Protection Specialist
>
> Alaskan Region Airports Division
>
> 222 West 7th Avenue, MS #14
>
> Anchorage, AK 99513
>
> 907-271-3665
>
> Kristi.M.Ponozzo@faa.gov
>
> ---
>
> **From:** Ponozzo, Kristi M (FAA)
> **Sent:** Thursday, October 6, 2022 3:26 PM
> **To:** jeff.feldpausch@sitkatribe-nsn.gov
> **Subject:** Re: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation
>
> Chairman Widmark,

Please find attached a letter and technical memo in regards to the proposed Sitka Seaplane Base project. I'd like to introduce myself and plan on reaching out with a phone call as well.

Kristi Ponozzo

Environmental Protection Specialist

Alaskan Region Airports Division

222 West 7th Avenue, MS #14

Anchorage, AK 99513

907-271-3665

Kristi.M.Ponozzo@faa.gov

--
Jeff Feldpausch
Resource Protection Director
Sitka Tribe of Alaska
(907) 747-7469

U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

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

October 5, 2022

Lawrence Widmark, Chairman
Sitka Tribe of Alaska (STA)
204 Siginaka Way
Sitka, AK 99835

Re: Sitka Seaplane Base Reconstruction Tribal Consultation Continuation

Dear Chairman Widmark and Tribal Council Members,

We wish to follow-up on our consultation from November 22, 2021, and letter from April 20, 2022. Since the April 2022, letter, the FAA has been re-evaluating sites and site analysis per our commitment to revisit alternatives. In particular, we understand that the Tribe prefers a different location for the seaplane base. Unfortunately, after further consideration, we have not yet been able to identify an acceptable alternate location.

Attached you will find a Technical Memorandum regarding the further site analysis. That analysis addressed the so-called "Safe Harbor Site" we discussed during our November consultation, as well as other sites.

The Tribe raised a variety of other concerns during our meeting in November 2021. Since that time, our initial efforts have focused on addressing location of the seaplane base and search for a new location. We did so because the Tribe clearly indicated it wanted a new location.

We remain committed to further discussions with the Tribe and responses or concerns the Tribe may have about the Technical Memorandum. We also remain open to recommendations and discussion on identifying alternative sites and/or recommendations and discussions specific to the siting criteria used to further evaluate current or additional sites.

The Tribe raised other concerns specific to traffic and noise, and we are currently reviewing the analysis to ensure they are adequate and address your specific concerns.

The FAA has a new contact, Environmental Protection Specialist Kristi Ponozzo, who you can reach out to and discuss the next steps with and ask any questions you may have, Kristi.m.ponozzo@faa.gov.

We would like to be able to meet with you and Tribal representatives again to further discuss this project when you are available.

Sincerely,

Kristi A. Warden
Director, Alaskan Region Airports Division

Attachment:
Technical Memo, Alternatives Selection, 2022

TECHNICAL MEMORANDUM

TO:	Jenny Liljedahl, PTS and Mike Schmetzer, City and Borough of Sitka
FROM:	Emily Creely, DOWL
DATE:	September 16, 2022
PROJECT:	Sitka Seaplane Base
SUBJECT:	Alternatives Selection

INTRODUCTION

The City and Borough of Sitka, in cooperation with the Federal Aviation Administration, is proposing a new seaplane base on Japonski Island in Sitka, Alaska (Project). The proposed project is needed as the existing seaplane has capacity, safety, and operational and condition deficiencies.

In an April 2022 letter, the Federal Aviation Administration stated the following in a letter to the chairman of the Sitka Tribe of Alaska the following:

> *The FAA hears most clearly that finding an alternate location would resolve many of your concerns. To that effect, we have requested CBS revisit their alternatives and take a deeper look to see if there are any other possible sites that could be viable. FAA intends to re-evaluate the project's site selection with an open mind, truly taking the Tribe's concerns into consideration.*
>
> *For transparency, we want to share with you that an impartial, fresh set of eyes is taking on this reevaluation, as no one on the current team was involved in making the previous selection. We also want to share some insight into our criteria for determining a selection, which includes the following:*
>
> - *Must be available to purchase*
> - *Must be on an existing roadway*
> - *Must have favorable wind conditions*
> - *Must be protected from harsh waves and sea swells*
> - *Must have adequate depth, with no obstacles such as rocks*
> - *Must not be in proximity to wildlife attractants*
> - *Needs to have room for expansion over current facility*
> - *Land component needs to have favorable topography and space for parking*
> - *Needs to have room to maneuver safely*
> - *Needs to have favorable traffic*
> - *Costs must be reasonable*
> - *Historic, cultural, and natural resources; including wildlife must be reviewed under strict adherence to NEPA in consultation with each authority having jurisdiction (SHPO, DNR, USACE, USFWS, NOAA NMFS, etc.)*
>
> *Alternative candidate sites CBS has provided so far include:*
>
> - *Current Seaplane Base*
> - *Current Selected Site*
> - *Mt. Edgecumbe*
> - *SEARHC Cove*

- *Japonski Lagoon*
- *Eliason Harbor*
- *Charcoal Island*
- *Work Float*
- *Safe Harbor*
- *Jamestown Bay*
- *Herring Cove*
- *Sawmill Cove*
- *Starrigavan Bay*

To advance the STA's understanding of alternatives development for the project, this memo will summarize the history of how sites were analyzed and review to determine if any sites were omitted without cause, if any reasons for sites other than the preferred site would now be re-considered based on changing conditions, and if any other sites could have been evaluated.

Alternatives Analysis Summary

The following table lists documents that were instrumental in developing alternatives and will be cited in this section:

Alternatives Development, Summary of Reports Cited

Year	Report Name	Prepared by
2002	Sitka Seaplane Master Plan (including separate Draft Alternatives Report)	HDR
2012	Siting Analysis, Sitka Seaplane Master Plan	DOWL HKM
2016	Updated Siting Analysis, Sitka Seaplane Master Plan	DOWL HKM

The 2002 Master Plan recommended a facility sized to accommodate a moderate growth scenario including commercial seaplane operations, with a short term (within 5 years) need for 13 slips, and a long-term (20 years) need for 15 slips. The Master Plan recommended the identification of a site with the flexibility to accommodate 20 slips to allow for a potential greater increase in demand.

The 2012 Siting Analysis forecasted growth in seaplane commercial activity based on a healthy local economy, particularly the fishery and tourism sectors, the existing seaplane base waiting list, and user interviews indicating unmet demand for private and commercial seaplane parking. In 2012, the existing 8 slips continued to be leased and there still was a waiting list. Users reported that a new facility in better condition, in a better location, with more amenities like parking and fuel, and with more seaplane parking would see significantly more use. The Siting Analysis recommended a location sized to accommodate 14 parking positions for based aircraft and 3 to 5 transient positions through 2016, with the flexibility to accommodate an additional 5 slips for based aircraft in the long term.

The 2016 Updated Siting Analysis was conducted as conditions changed (by 2015 only six slips were occupied) and in 2016 the facility was temporarily closed due to damage to the floats. A new analysis was completed due to an updated aviation forecast unconstrained by facility limitations and represents expected demand if there were enough parking spots at the existing SPB.

Site Alternatives in Cited Reports

Alternative Name	2002	2012	2016
Current Seaplane Base	x	x	x
Current Selected Site[a]		x	x
Mt. Edgecumbe	x		
SEARHC Cove	x		
Japonski Lagoon[b]	x		
Eliason Harbor		x	x
Charcoal Island	x		
Work Float	x		
Safe Harbor	x	x	
Jamestown Bay	x		
Herring Cove	x		
Sawmill Cove	x		
Starrigavan Bay	x		
Thomsen Harbor/Turnaround area[c]	x		

[a]*Site is referred to as Japonski Site or Japonski Island Alternative*
b Site it referred to as Sitka Rock Gutierrez Airport Lagoon
c Site not included in sites discussed in FAA-STA communications 2021/2022

Evaluation Criteria Used in Cited Reports

Criteria	2002	2012	2016
Safely accommodate facilities/operations per AC 150/5395-1, Seaplane Bases[a]	x		
Sufficient Size/Capacity	x	x	x
Slow Currents (currents less than 3.5 mph)	x		
Sufficient Water Level	x		
Safe From Wave Action	x	x	x
Debris Free Area	x		
Safe Maneuvering Space	x	x	x
Sheltered Moorage	x		
Safe Bottom Conditions/Dredging needs	x	x	x
Free from Wildlife Attractants	x	x	x
Safe Bottom Conditions	x		
Prevailing Winds	x	x	x
Approach, Taxi and Departure Paths/Distance	x	x	x
Accommodation of Floating Dock and Gangway/Growth	x	x	x
Vehicle Access	x	x	x
Capacity for Slips		x	x
Boat traffic conflicts		x	x
Drive-down ramp capacity/fueling facilities		x	x
On-site aircraft maintenance		x	x
Costs, Revenue and Property Acquisition		x	x
Consistent with adjacent land uses		x	x
Icing		x	x

[a] *For detailed description of each criteria, see Attachment 2.*

Alternatives Evaluation 2002

Alternative	Reason for Removal from Consideration or Advancement
Current Seaplane Base	Site conflicts with adjacent users; no room for expansion; cannot accommodate ramp space; rocks and boulders under water; inadequate size for safe maneuvering; no upland area for parking; narrow wingtip clearances between seaplanes
Current Selected Site	**Became Preferred Alternative and evaluated further in 2012**
Mt. Edgecumbe	**Became Alternative #2[b]**
SEARHC Cove	**Became Alternative #3[c]**
Japonski Lagoon	Would require a new channel be blasted in western end of Charcoal Island; would conflict with areas set aside for expansion of Rocky Gutierrez Airport; major wildlife attractant nearby
Eliason Harbor	**Not evaluated in 2002**
Charcoal Island[a]	Exposed to turbulent wind and swells; unsafe without breakwater
Work Float	Unprotected from winds; congested area; no upland development area; access control issues
Safe Harbor	**Became Alternative #1[d]**
Jamestown Bay[a]	Exposed to turbulent wind and swells; unsafe without breakwater; high level of small and large boat traffic; large adjacent residential area
Herring Cove[a]	Long unprotected fetch and proximity to mountains generate turbulent wind and wind-driven waves of considerable size; topography also creates limitations during cloudy/foggy weather; too far from town for pilots and community
Sawmill Cove[a]	
Starrigavan Bay[a]	Exposed to turbulent wind and swells; water choppy; large wakes from ferry; no room for upland development; too far from town for pilots and community
Thomsen Harbor/Turnaround area	Constrained by large boat harbor and shallow water; insufficient space at low tide without dredging; near high-value wetlands; near freshwater stream mouth (would cause freeze-up in winter); high level of boat traffic

[a] fatal flaw and removed from further consideration
[b] this site was not further evaluated in 2012 study due to opposition from Mount Edgecumbe High School
[c] this site was not further evaluated in 2012 study as concerns related to noise and traffic were identified and no clear access through U.S. Coast Guard property was identified
[d] this site was not further evaluated in 2012 study due to bird hazard and boat traffic

Alternatives Evaluation 2012 and 2016

The alternatives analysis in both 2012 and 2016 were nearly identical for criteria and results, summarized below. [1]

[1] One change between 2012 and 2016: The Existing Seaplane base was rated positively in 2012 and rated negatively in 2016 for "adjacent land uses"

Alternative	Reason for Removal from Consideration or Advancement
Current Seaplane Base	Scored at bottom mainly due to requiring high property acquisition, high wildlife hazards, conflicts with boat traffic, ability to accommodate future growth, and capacity issues
Current Selected Site	**Scored highest for nearly all categories**
Eliason Harbor	Scored second mainly due to requiring high property acquisition, and exposure to adverse wind and wave conditions

Review and Discussion

The only site that was not evaluated in 2012 and 2016 without a detailed explanation is the Safe Harbor Site. The 2002 summary of the site states:

> Site 1 proposes development of a new seaplane facility at the former location of Safe Harbor adjacent to Japonski Island. Safe Harbor was the location of the airport ferry dock prior to the construction of O'Connell Bridge. Under this alternative, the relocated seaplane base facility (Figure 9) would be on Japonski Island, directly across Sitka Channel from the existing seaplane base and between the U.S. Coast Guard dock and University of Alaska property.
>
> This area of Sitka Channel provides improved seaplane maneuvering room as compared with the existing facility and is large enough to accommodate safe taxiing and turning movements into the facility. Dredging and construction of a seawall are proposed as a means of tightening its position as close as possible to the shoreline to keep it out of Sitka Channel. This would protect the facility from boat traffic. The U.S. Coast Guard dock would further protect the takeoff and landing area from swell, waves, and wind coming up the channel. Japonski Island protects the area from open-ocean wave action and the site provides a relatively sheltered moorage area from local winds. Nautical charts indicate that there are submerged piles in this location, which would need to be removed. The dredging and seawall construction would also ensure that the bottom is free of hazards and that sufficient water depth is maintained at the full tidal range.
>
> It is expected that a seaplane base at Site 1 would continue to use the FAA-designated landing and takeoff area along the centerline of Sitka Channel. This lane is well aligned for the prevailing winds, but bird and boat hazards associated with the landing and takeoff area would remain. If the facility were to be relocated to the Safe Harbor site, bird hazard mitigation measures recommended in the Wildlife Hazard Assessment report prepared for the Sitka Rocky Gutierrez Master Plan (DOT&PF 1999) should be implemented. The takeoff and landing lane should be marked on all charts. Because the lane is split by O'Connell Bridge (an obstruction) at its southeastern end, taxiing under the bridge would continue to be required for approach and departure operations in that direction.

Access to the new facility would be along Seward Avenue. The area proposed for vehicle parking is currently paved and used as a parking lot on property managed by the University of Alaska, SE. Because of the large amount of parking area available in front of UAS, the area proposed for seaplane base vehicle parking is not currently used.

The upland area adjacent to this site is zoned as "Public" land and is owned by the State of Alaska, Department of Education. The State of Alaska also owns and manages the tidelands. Nearby land uses include the U.S. Coast Guard dock, the University of Alaska, Southeast campus, and Mt. Edgecumbe High School dormitories. Access and upland development of parking facilities would require acquisition of land from the Department of Education.

Noise would be the primary impact to the upland properties. Because takeoffs and landings would occur on the same water operating area and in an identical manner as the existing conditions, no noticeable change in noise conditions is anticipated.

The adjacent dock is used by the Coast Guard as the home port for the "Maple." The primary mission of the Maple and its crew is maintaining navigational aids and secondarily supporting other Coast Guard functions and responsibilities such as law enforcement, homeland security, and search and rescue operations. The location and design of any future seaplane base adjacent to the Coast Guard dock would need to take into consideration the docking and maneuvering requirements of the Maple and may in fact be incompatible with the Coast Guard operations in this area. In discussions with the Coast Guard, the configuration shown in Layout 1 would affect the ability of the Maple to safely navigate into and out of their dock. Any seaplane layout at Safe Harbor should be tucked into shore as much as possible.

The location of Alternative 1 would be close to the wildlife attractant created by the fish processing waste outfalls in Sitka Channel. Safe Harbor is approximately 600 feet from the processing facility itself. Site 1 might be a slight improvement over the existing seaplane facility, in that the birds tend to gather at the processing plant, which is directly adjacent to the existing facility. The Wildlife Hazard Assessment (USDA 1999) reports that a meeting was held with two of the seafood processors to inform them of the problem. Several possible remedies were discussed, including night dumping and a possible increase in fish waste composting. The WHA recommends further study to understand the relationship between the discharge of seafood wastes and seabird movements in the area.

Advantages:

- Sufficient upland area to develop vehicle parking.
- Provides protection from sea swells, wind, and waves.
- Can be easily accessed from the existing road system.
- Least constrained future landside development of the three alternatives.

Disadvantages:

- Seaplane operations (noise) remain in Sitka Channel.
- Seaplane operations in close proximity to the U.S. Coast Guard vessels and dock.
- Operations still in a relatively congested boat traffic area.
- No substantial improvement from bird hazards.
- Substantial pedestrian and vehicle traffic and congestion on uplands area

The Safe Harbor location is shown in magenta below and is closer to Mt. Edgecumbe than the current, proposed location.

The Safe Harbor site would not constitute an improvement over the existing proposed project. No further analysis of this site as a viable alternative is needed.

Conclusion

No other sites have been recommended that have not been evaluated between 2002 and 2016. No reason exists for sites other than the preferred to be re-considered. No further site evaluation is recommended.

From: Ponozzo, Kristi M (FAA)
To: "Feldpausch, Jeff"
Cc: Campbell, Kendall D (FAA)
Subject: RE: City and Borough of Sitka New Seaplane Base - Project update
Date: Monday, September 16, 2024 9:54:00 AM
Attachments: Sitka SPB G2G Follow Up.pdf

Jeff – If you want to pass anything along to the Trial Council, we offer the following update on the proposed Sitka Seaplane Base Project:

The proposed relocation of the Sitka Seaplane Base environmental document and process continues to move forward. We provided an update in April (attached) and have since then completed additional cultural resources investigation in the project area to include subsurface testing. We will include a draft report of that investigation with additional National Historic Preservation Act Section 106 consultation correspondence in the near future.

Additionally, we are currently working on updating the NEPA analysis to incorporate the de-activation of the existing seaplane base. The de-activation will also be incorporated into the Section 106 analysis.

The Supplemental Environmental Assessment, while no specific timeline has been determined, is anticipated to be made available for public comment sometime this winter, and we will specifically reach out the Sitka Tribe for consultation. We appreciate your interest and engagement in the project and process and look forward to future meetings and communication with Tribal members and the Council.

Kristi Ponozzo
Environmental Protection Specialist
Federal Aviation Administration
Alaskan Region Airports Division
222 West 7th Avenue, MS #14
Anchorage, AK 99513
907-271-3665
Kristi.M.Ponozzo@faa.gov

From: Ponozzo, Kristi M (FAA)
Sent: Wednesday, August 28, 2024 10:42 AM
To: Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
Cc: Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>
Subject: RE: City and Borough of Sitka New Seaplane Base - Project update

Thank you Jeff! I'll let you know about future dates and I'll put together a few things for you to share.

Kristi Ponozzo
Environmental Protection Specialist
Federal Aviation Administration
Alaskan Region Airports Division
222 West 7th Avenue, MS #14
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From: Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
Sent: Wednesday, August 28, 2024 8:35 AM
To: Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov>
Cc: Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>
Subject: Re: City and Borough of Sitka New Seaplane Base - Project update

Good Morning Kristi

My apologies for the delayed response. I checked with our CEO and the time prior to the 9/18 council meeting is booked. You might need to look at a date later in the year. I can also pass along any information you want to share with the Council.

Jeff

On Thu, Aug 22, 2024 at 11:40 AM Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov> wrote:

> Hey Jeff! I just wanted to know if you had heard anything on availability to meet on Sept. 18th. We're just trying to solidify some travel plans on our end. Thanks again!
>
> Kristi Ponozzo
> Environmental Protection Specialist
> Federal Aviation Administration
> Alaskan Region Airports Division
> 222 West 7th Avenue, MS #14
> Anchorage, AK 99513
> 907-271-3665
> Kristi.M.Ponozzo@faa.gov
>
> ---
>
> **From:** Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
> **Sent:** Monday, August 19, 2024 4:23 PM
> **To:** Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov>
> **Cc:** Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>

Subject: Re: City and Borough of Sitka New Seaplane Base - Project update

Hello Kristi

I'll pass your request up the chain of command and let you know shortly.

Jeff

On Fri, Aug 16, 2024 at 1:10 PM Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov> wrote:

> Jeff – Thank you! We are trying to coordinate to be there on Sept. 18th. Would it be possible to hold that date for a work session prior to the Council Meeting? We are trying to be there in person.
>
> Kristi Ponozzo
> Environmental Protection Specialist
> Federal Aviation Administration
> Alaskan Region Airports Division
> 222 West 7th Avenue, MS #14
> Anchorage, AK 99513
> 907-271-3665
> Kristi.M.Ponozzo@faa.gov
>
> ---
>
> **From:** Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
> **Sent:** Thursday, August 15, 2024 4:29 PM
> **To:** Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov>
> **Cc:** Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>
> **Subject:** Re: City and Borough of Sitka New Seaplane Base - Project update
>
>
>
> Hello Kristi
>
> Unfortunately all upper level management will be out of town at a training that week. I can check with my supervisor to see if there is the possibility to have a work session (via Zoom or in person) prior to the September 18th Council meeting (usually around 515). If that turns out to not be an option I could put you on the September 19th Natural Resource Committee meeting agenda for an update (via Zoom or in person). Let me know if you're interested in either of these options and I'll see what I can do.

Jeff

On Thu, Aug 15, 2024 at 3:43 PM Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov> wrote:

> Jeff – Hey! I'm reaching out again to let you know we are looking at dates this Fall to head down to Sitka for a short visit. We are currently looking at the week of Sept. 23rd. We've love to meet with you and/or members of the Tribe and Tribal Council and Chairman Widmark for coffee, lunch, or whatever would work for you and discuss the Seaplane base project. Please let me know if any dates or times that work for you all.
>
> Thanks again,
>
> Kristi Ponozzo
> Environmental Protection Specialist
> Federal Aviation Administration
> Alaskan Region Airports Division
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> Kristi.M.Ponozzo@faa.gov
>
> ---
>
> **From:** Ponozzo, Kristi M (FAA)
> **Sent:** Thursday, July 25, 2024 12:47 PM
> **To:** Feldpausch, Jeff <jeff.feldpausch@sitkatribe-nsn.gov>
> **Cc:** Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>
> **Subject:** City and Borough of Sitka New Seaplane Base - Project update
>
> Jeff, Hello! I hope all is well in Sitka this summer. I wanted to reach out, with Kendall, and offer a potential project update on the proposed new Seaplane Base environmental analysis. We thought we would reach out to you and see if this was wanted, potentially with the Tribal Council as before, or something less formal? We thought we could also invite the U.S. Army Corps of Engineers to be a part of this, if they are able?
>
> Let me know your thoughts – Thank you!
>
> Kristi Ponozzo
> Environmental Protection Specialist
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U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

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

April 17, 2024

Lawrence Widmark
Chair
Sitka Tribe of Alaska
204 Siginaka Way
Sitka, Alaska 99835
Email: Lawrence.Woodmark@sitkatribe-nsn.gov, lisa.gassman@sitkatribe-nsn.gov,
jeff.feldpausch@sitkatribe-nsn.gov

Dear Chairman Widmark:

In respect of your tribal sovereignty and in recognition of the Federal Aviation Administration's (FAA) trust responsibility to Federally Recognized Tribes, I am writing to update you on the FAA Alaskan Region Airports Division review of the City and Borough of Sitka's (CBS) application for federal assistance to be the sponsor of the proposed new Sitka Seaplane Base. Since our government-to-government consultation in early September 2023 we have initiated work on the Supplemental Environmental Assessment to comply with National Environmental Policy Act guidelines and have made efforts to address concerns raised by the Sitka Tribe of Alaska Tribal Council and staff during that consultation. In particular, the FAA agreed to provide funding for an additional cultural resources field inventory of the project area and to revise the additional noise analysis.

In response to the Tribes' description of the history of Japonski Island and their concerns for cultural resources in undisturbed locations, the FAA has agreed to fund an additional cultural resources investigation in the project area to include subsurface testing. This effort is planned for the spring of 2024 and the FAA invites the Tribe to assist and collaborate on this effort with the CBS's cultural resources contractor. The FAA also requested the noise study be revised to include the two additional noise receptor locations suggested during our consultation to include two locations on the docks west of Sitka Harbor; a salmon processing station used during culture camps and another dock used for subsistence purposes. We have included a draft of the revised noise study as an attachment and invite you to review and comment on the results.

Upon completion of the additional efforts described above, the FAA will determine if amendments are necessary to the Section 106 analysis and will restart our Section 106 consultation on the development of the memorandum of agreement (MOA) to resolve the project's adverse effects to historic properties at the Japonski Island Observation Post (SIT-01115) and nearby WWII features (SIT-01124) which are being treated as eligible for listing in the National Register of Historic

Places and located within the Sitka Naval Operating Base and U.S. Army Coastal Defenses National Historic Landmark. The FAA last consulted with you on the MOA in 2021 and provided an update on the effort in late 2022. Since that time the FAA has revised the MOA and included a more robust Inadvertent Discovery Plan.

Finally, during our consultation in September, Council Member Fedrick Olsen mentioned concerns for how in-water construction noise could affect marine mammals. The FAA is addressing potential effects to marine mammals through formal consultation with both the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS), which includes an analysis of noise generated during construction and potential effects of the project. Biological Assessments have been accepted by NMFS and USFWS and an application for an Incidental Harassment Authorizations (IHA) was submitted and approved by NMFS. We anticipate USFWS to issue a No Jeopardy finding in the Spring and the NMFS IHA is anticipated to be issued in the Summer.

The FAA greatly appreciates your participation in the consultation process, and we look forward to continued cooperation and collaboration. If you have any questions or would like to discuss the FAA's proposed path forward to continue the Section 106 process, please contact Kendall Campbell, FAA's Alaska Native/Tribal Coordinator at (907) 271-5030 or kendall.d.campbell@faa.gov

Sincerely,

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

Electronic cc w/ Enclosures:
Kristi Ponozzo, FAA, Environmental Protection Specialist
Joseph Bea, City and Borough of Sitka, Airport Terminal Manager
Jenny Liljedahl, Professional and Technical Services, Project Manager

DOWL

MEMORANDUM

TO:	Michael Harmon, P.E., CBS Municipal Engineer
THROUGH:	Aaron Christie, P.E., Sr. Project Manager
FROM	Ben Mello, C.M., Aviation Project Manager
DATE:	January 31, 2024
SUBJECT:	Sitka SPB – 2024 Noise Study Revisions

This memorandum details the methodology and results for the fourth iteration of the noise analysis associated with the new Sitka Seaplane Base (SPB). Based on the previous reviews by the Federal Aviation Administration (FAA), the new Sitka Seaplane Base noise analysis was revised using the Aviation Environmental Design Tool (AEDT) Version 3e and applying non-standard AEDT substitutions that reflected the fleet mix, and use of hard ground attenuation in order to accurately model sound travelling over water. In addition, the FAA requested that the revised noise analysis include details about the methodology and data used for modeling and to indicate the necessary approvals that were received prior to conducting the modeling.

Originally, the first iteration of this noise model was submitted in January 2021 as an appendix to the Sitka SPB Draft EA. The second iteration was submitted in a memorandum on March 24th, 2021. The third iteration was submitted in a memorandum on January 17th, 2023. The two (2) memorandums submitted prior to this memo should be read to understand the full background of this noise study. To summarize them in short:

1) **1st Memorandum – 2nd iteration of noise study.** The first memo was submitted on March 24, 2021, under the subject "Sitka SPB – Noise Re-Evaluation". This memo was a revision of the 1st noise study submitted with the 2021 Draft EA. The FAA rejected the study due to a non-standard substitution for the fleet mix and use of peak day operations. The FAA approved the non-standard substitution prior to DOWL submitting the 2nd memorandum. In addition, for the 2nd memo average daily operations were used instead of peak day.

2) **2nd Memorandum – 3rd iteration of the noise study**. The second memo was submitted on January 17th, 2023, under the subject "Sitka SPB – 2022 Noise Re-Evaluation". Due to not receiving prior approval to run the study using the Hard Ground Attenuation option, The noise analysis was deemed insufficient to meet FAA obligations for environmental review under NEPA as detailed in FAA Order 1050.1F and the associated desk reference. Prior to submitting the 3rd and current memo, FAA formally gave approval for use of Hard Ground Attenuation, this is discussed on page 2 "AEDT 3e Noise Study Inputs – Operations."

AEDT 3e Noise Study Inputs – Definitions

Receptors - In order to capture a comprehensive picture of the long-term effects caused by moving the existing seaplane base, the Day-Night Average Sound Level (DNL) metric was run on both the existing and proposed water lanes. The receptors used are detailed in Table 1. These receptors were chosen due to proximity to the existing and proposed seaplane base and meeting the definition of noise sensitive per **CFR Sec. A150.101 *Noise contours and land usages*[1].** In addition, a receptor grid covering a 0.8 mi by 0.8 mi area consisting of 6400 points was used to

[1] Section A150.101, sub section e, paragraph 6 states: *"…the noise exposure maps must also contain and identify: …(6) Location of noise sensitive public buildings (such as schools, hospitals, and health care facilities), and properties on or eligible for inclusion in the National Register of Historic Places."*

draw sound contour lines that can be seen in Figures 1 and 2 (Attachment 1). Two identical receptor grids were used, each grid centered on the respective water lane. Straight-in and -out flight tracks were developed for the SPB (see Figures 1 and 2). Due to the SPB and Sitka Rocky Gutierrez Airport (SIT) being uncontrolled, straight-in and -out flight tracts for the water lanes is the most accurate representation of actual SPB traffic patterns for noise modelling purposes.

Table 1: Noise receptors used for study.

Sitka Noise Study Receptors				
Receptor	**Receptor Name**	**Latitude**	**Longitude**	**Elevation MSL (ft)**
1	Mt. Edgecumbe HS	57.05413	-135.35400	15
2	Mt. Edgecumbe Housing	57.05125	-135.35241	21
3	SEARHC Hospital - Exst	57.05196	-135.35546	21
4	SEARHC Hospital - New	57.05307	-135.35614	21
5	SEARHC Community Health Services	57.05406	-135.35926	20
6	Building 1200-1202[2]	57.05512	-135.36280	11
7	Eliason Harbor 1[3]	57.05539	-135.35166	0
8	Eliason Harbor 2[3]	57.05771	-135.35592	0

AEDT 3e Noise Study Inputs – Operations

Fleet Mix - The fleet mix used for this study required non-standard AEDT substitutions to represent aircraft not present in the program, and the use of hard ground attenuation. The FAA's Office of Environment and Energy (AEE) approved these substitutions July 12th, 2023. The approval letter conditionally stated that this fleet mix could only be used in AEDT 3e and with Hard Ground Attenuation enabled. The fleet mix and operations for each plane are detailed in Table 2. Operations were split in a 75% to 25% ratio based on prevailing wind direction. In general, wind currents in Sitka tend to blow from the south-southeast (SSE) to west-northwest (WNW) through fall, winter, and spring. In the summer, wind direction tends to be more erratic and can come from any direction though seldom from the northeast (see Figure 3). Operations data was collected by CBS in 2020 by asking stakeholders about their annual operations, as well as using their input on anticipated future operations to create a forecast.

Operation Groups and Annualizations – Identical approach and departure operations were used for both the proposed and existing water lane with the only difference being where the operations take place (proposed vs existing/no action). The operation groups were then assigned to their respective annualizations, again, one annualization for the proposed water lane and another for the existing water lane. Due to the existing seaplane base not having capacity for any new based aircraft, operations numbers have become stagnant and are not expected to change for the foreseeable future. Therefore, for the purposes of this study, the existing condition is the same as the future no action alternative.

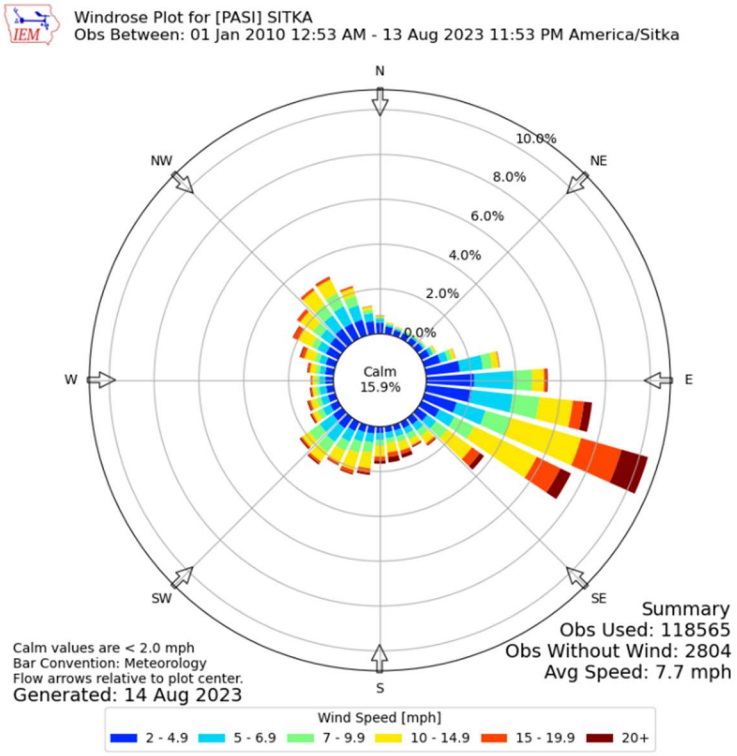
[2] 1200 Seward Ave. is owned by SEARHC, used by the Office of the Controller. 1202 Seward Ave. is owned by the State and used by the Mt. Edgecumbe Highschool's principal.

[3] The Sitka Tribe of Alaska requested that Eliason Harbor 1 and 2 be listed as receptors in the noise study and that these receptors be classified as noise sensitive locations due to their use by the Sitka Tribe of Alaska for education purposes during culture camps which involve school age children.

Table 2: Fleet mix used for the study.

SPB Noise Study - Fleet Mix Data				
Design Aircraft	**AEDT EQUIP_ID**	**Representative AEDT Airframe**	**AEDT BADA_ID**	**No. of Daily Ops**
Avid Flyer	6311	Piper J-3 Cub (FAS)	C172	2
Cessna 180	3972	Cessna 182 Float	C182	3
Cessna 185	3972	Cessna 182 Float	C182	3
Cessna 206	3973	DeHavilland DHC-2 Mk III Beaver Float	PAY3	2
Cessna 208	2106	Cessna 208 Caravan	TBM8	4
DeHavilland Beaver	3973	DeHavilland DHC-2 Mk III Beaver Float	PAY3	2
Husky A1	3972	Cessna 182 Float	C182	3
Piper Cub	6311	Piper J-3 Cub (FAS)	C172	2
			TOTAL:	**21**

Figure 3 - Meteorological wind rose by Iowa State University, Iowa Environmental Mesonet



AEDT 3e Noise Study Inputs – Operations Continued

Although there are 21 operations in each operation group, AEDT 3e only counts the number of aircraft records. For example, this would mean a single aircraft record with 3 operations would only show up as 1 record. In the case of this noise study, there are 11 records representing 21 daily operations (see Table 4).

Table 3: The operation groups used for the study.

Operation Groups				
Name	**Type**	**Start Time***	**Duration**	**Number of Records**
PROPOSED-21OPS	Aircraft	7/19/2023 0:00	1d 00h	11
EXISTING-21OPS	Aircraft	7/19/2023 0:00	1d 00h	11

*__Start Time__ denotes when the operation group begins. Operations within the operation group occur at the time identified by the individual operations. In this case, if operations began at 1:00 AM, they would occur 1 hour after the operation group started (0:00). In the case of the new Sitka SPB noise study, all operations start after 7:00 AM.

Table 4: Operation group by records and operations per record.

PROPOSED-21OPS, Operation Group Breakdown			
Record	**Airframe**	**Operation Type**	**Operation Count**
1	Cessna 182 Float	Arrival	2
2	Piper J-3 Cub (FAS)	Departure	1
3	Cessna 182 Float	Departure	2
4	Piper J-3 Cub (FAS)	Departure	1
5	Cessna 182 Float	Departure	3
6	DeHavilland DHC-2 Mk III Beaver Float	Departure	2
7	Cessna 208 Caravan	Departure	2
8	Piper J-3 Cub (FAS)	Arrival	2
9	Cessna 182 Float	Arrival	2
10	DeHavilland DHC-2 Mk III Beaver Float	Arrival	2
11	Cessna 208 Caravan	Arrival	2

AEDT 3e Noise Study Inputs – Defined Metrics

DNL Metric – This noise study modeled the Day-Night Average Sound Levels (DNL) of the existing/no action and proposed water lane. Several metric options were left to the default setting and can be viewed in the attached Study Report generated by AEDT (see Attachment 2).

Hard Ground Attenuation was enabled when running the DNL metric to simulate sound travelling over a hard surface described as concrete or water. FAA approval for Hard Ground Attenuation was received on July 12th, 2023.

Use Terrain Data was also enabled when running the DNL metric in order to include elevation data. A DEM derived from LiDAR point data was downloaded from the Alaska Department of Natural Resources, DGGS.

AEDT 3e Noise Study Outputs – Results

There is a noticeable decrease in sensitive noise receptor DNL between the proposed water lane and the future no action/existing alternatives for receptors 1-5 and 7. This is mainly attributed to the movement of the water lane further into the Western Anchorage which puts a larger amount of space between the operations area and the receptors. It should be noted however that the chosen runway ends only represent the furthest extent from the water lane midpoint that operations can occur. As such, there is a slight variability in overall noise exposure. Runway 12W's threshold however is positioned in such a way that pilots taxiing in a straight line towards

Eliason Harbor will find themselves in line with Runway 12W's threshold, poising the new water lane to be in a relatively quieter location than prior. Receptor 8: Eliason Harbor 2, is the only location where the average sound level is higher (see Table 5); this is due to Eliason Harbor's proximity to the new water lane (see Attachment 1: Figure 1). Despite the increased noise level at receptor 8, all receptors remain below the 65 dB DNL putting the new Sitka Seaplane Base within the compatible land use guidelines from Table 1, Appendix A of Title 14 CFR Part 150.

Table 5: Observed receptor noise level differences.

Receptor Change in Sound				
ID	**Receptor Name**	**Existing/No Action: Noise Level (dB)**	**Proposed: Noise Level (dB)**	**Delta Noise Level (dB)**
1	Mt. Edgecumbe HS	61	58	-3
2	Mt. Edgecumbe Housing	53	51	-2
3	SEARHC Hospital - Exst	52	50	-2
4	SEARHC Hospital - New	55	52	-2
5	SEARHC Community Health Services	55	52	-2
6	Building 1200-1202	53	53	0
7	Eliason Harbor 1	60	59	-1
8	Eliason Harbor 2	54	63	+9

References

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Holland, S. (2023). "Memorandum: Sitka SPB - 2022 Noise Re-Evaluation." DOWL, Anchorage.

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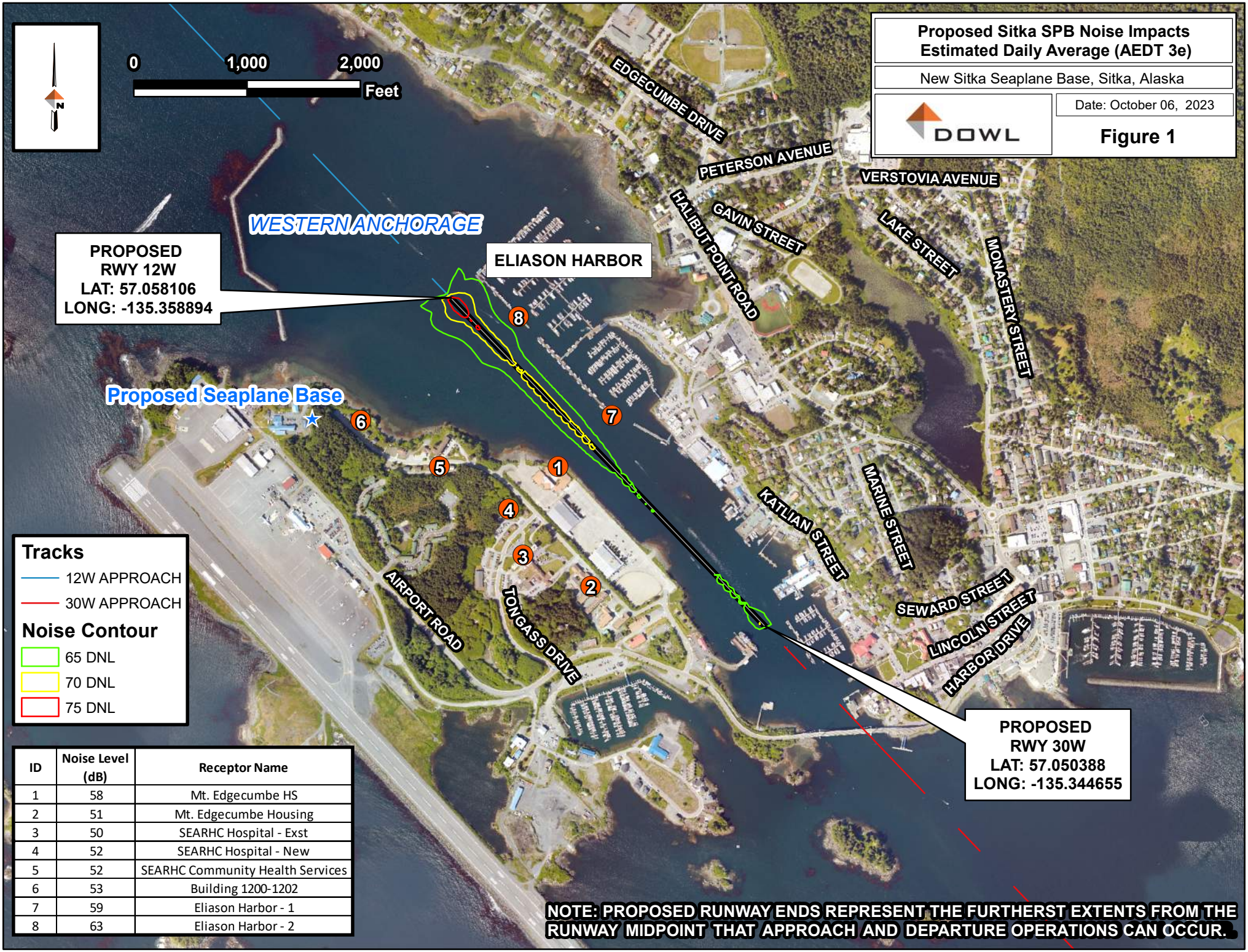
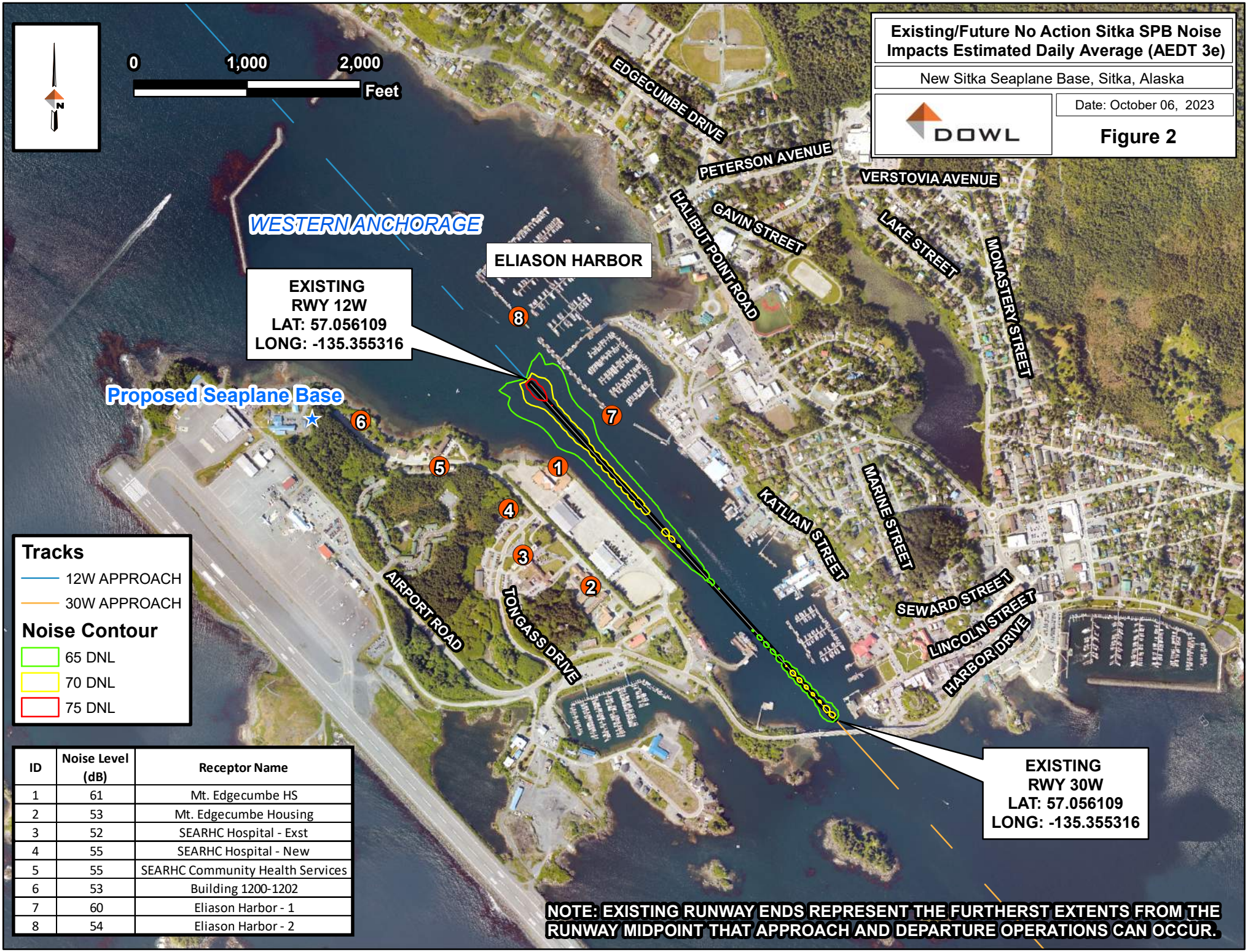
ATTACHMENT 1:

NOISE STUDY FIGURES



ID	Noise Level (dB)	Receptor Name
1	58	Mt. Edgecumbe HS
2	51	Mt. Edgecumbe Housing
3	50	SEARHC Hospital - Exst
4	52	SEARHC Hospital - New
5	52	SEARHC Community Health Services
6	53	Building 1200-1202
7	59	Eliason Harbor - 1
8	63	Eliason Harbor - 2



ID	Noise Level (dB)	Receptor Name
1	61	Mt. Edgecumbe HS
2	53	Mt. Edgecumbe Housing
3	52	SEARHC Hospital - Exst
4	55	SEARHC Hospital - New
5	55	SEARHC Community Health Services
6	53	Building 1200-1202
7	60	Eliason Harbor - 1
8	54	Eliason Harbor - 2

ATTACHMENT 2:

AEDT 3E STUDY REPORT

Study Input Report

Study Information

Report Date: 10/6/2023 5:04:51 PM

Study Name: Sitka_SPB_New

Description:

Study Type: NoiseAndEmissions

Mass Units: Kilograms

Use Metric Units: No

Study Database Information

Study Database Version: 1.89.3

Airport Layouts

Layout Name: EXISTING RUNWAY

Airport Name: SITKA SEAPLANE BASE

Airport Codes: 0Q9

Airport Description:

Country: US

State: ALASKA

City: SITKA

Latitude: 57.053269 degrees

Longitude: -135.350389 degrees

Elevation: 0.000000 feet

Runway: 12W-NEW/30W-NEW

Length: 3998 feet

Width: 150 feet

Runway End: 12W-NEW

Latitude: 57.058106 degrees

Longitude: -135.358894 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway End: 30W-NEW

Latitude: 57.050388 degrees

Longitude: -135.344655 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway: 30W-EXT/12W-EXT

Length: 3999 feet

Width: 200 feet

Runway End: 30W-EXT

Latitude: 57.048189 degrees

Longitude: -135.341449 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway End: 12W-EXT

Latitude: 57.056109 degrees

Longitude: -135.355316 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Layout Name: PROPOSED RUNWAY

Airport Name: SITKA SEAPLANE BASE

Airport Codes: 0Q9

Airport Description:

Country: US

State: ALASKA

City: SITKA

Latitude: 57.053269 degrees

Longitude: -135.350389 degrees

Elevation: 0.000000 feet

Runway: 12W-NEW/30W-NEW

Length: 3998 feet

Width: 150 feet

Runway End: 12W-NEW

Latitude: 57.058106 degrees

Longitude: -135.358894 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway End: 30W-NEW

Latitude: 57.050388 degrees

Longitude: -135.344655 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway: 30W-EXT/12W-EXT

Length: 3999 feet

Width: 200 feet

Runway End: 30W-EXT

Latitude: 57.048189 degrees

Longitude: -135.341449 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Runway End: 12W-EXT

Latitude: 57.056109 degrees

Longitude: -135.355316 degrees

Elevation: 0.000000 feet

Approach Displaced Threshold: 0 feet

Departure Displaced Threshold: 0 feet

Crossing Height: 50 feet

Glide Slope: 3.000000 deg

Change in Headwind: 0%

Effective Date: 1/1/2023

Expiration Date: 12/31/2025

Gate: G-1

Latitude: 57.055462

Longitude: -135.365708

Elevation: 0.000000 feet

Aircraft Size: ANY

SigmaY0: 16

SigmaZ0: 3

Release Height: 4.921260 feet

Receptor Sets

Receptor Set: 80^2 GRID

Description:

Number of receptors: 6400

Receptor Set Type: Receptor

Receptor Type: Grid

Latitude: 57.047448 degrees

Longitude: -135.361069 degrees

Elevation: 0.000000 feet

X Count: 80

Y Count: 80

X Spacing: 0.01

Y Spacing: 0.01

Receptor Set: 80^2 GRID-EXISTING

Description:

Number of receptors: 6400

Receptor Set Type: Receptor

Receptor Type: Grid

Latitude: 57.046616 degrees

Longitude: -135.359543 degrees

Elevation: 0.000000 feet

X Count: 80

Y Count: 80

X Spacing: 0.01

Y Spacing: 0.01

Receptor Set: Sitka-ALL

Description:

Number of receptors: 8

Receptor Set Type: Receptor

Receptor Type: Point

Annualizations (Scenarios)

Annualization (Scenario): Root

Description: Root

Start Time: Wednesday, July 19, 2023

Duration: 01 days 00 hours

Air Performance Model: SAE_1845_APM

Noise Altitude Cutoff MSL (ft): n/a

Mixing Height AFE (ft): 3000

Fuel Sulfur Content: 0.0006

Sulfur Conversion Rate: 0.024

Use Bank Angle: True

Taxi Model: UserTaxiModel

Airport Layouts: PROPOSED RUNWAY

Annualization: Root

Annualization (Scenario): EXISTING

Description: EXISTING

Start Time: Wednesday, July 19, 2023

Duration: 01 days 00 hours

Air Performance Model: SAE_1845_APM

Noise Altitude Cutoff MSL (ft): n/a

Mixing Height AFE (ft): 3000

Fuel Sulfur Content: 0.0006

Sulfur Conversion Rate: 0.024

Use Bank Angle: True

Taxi Model: UserTaxiModel

Airport Layouts: EXISTING RUNWAY

Annualization: EXISTING

Annualization (Scenario): Root1

Description: Root1

Start Time: Sunday, January 1, 2023

Duration: 365 days 00 hours

Air Performance Model: SAE_1845_APM

Noise Altitude Cutoff MSL (ft): n/a

Mixing Height AFE (ft): 3000

Fuel Sulfur Content: 0.0006

Sulfur Conversion Rate: 0.024

Use Bank Angle: True

Taxi Model: UserTaxiModel

Airport Layouts: PROPOSED RUNWAY

Annualization: Root1

Annualization: Root

Operation group: PROPOSED-21OPS

Description: PROPOSED-21OPS

Start time: 7/19/2023 12:00:00 AM

Duration: 01 days 00 hours

Number of aircraft operations: 11

Annualization: EXISTING

Operation group: EXISTING-21OPS

Description: EXISTING-21OPS

Start time: 7/19/2023 12:00:00 AM

Duration: 01 days 00 hours

Number of aircraft operations: 11

Annualization: Root1

Operation group: TEST-PROPOSED

Description: TEST-PROPOSED

Start time: 1/1/2023 12:00:00 AM

Duration: 365 days 00 hours

Number of aircraft operations: 11

User-Defined Aircraft Profiles

User-Specified Aircraft Substitutions

Metric Results

Metric Result ID: 1

Metric Result Name: PROPOSED_RUNWAY_TEST

Metric Result Description:

Metric: DNL

Receptor Set: 80^2 GRID

Annualization: Root

Run Start Time: 10/6/2023 5:04:00 PM

Run End Time: 10/6/2023 5:04:09 PM

Run Status: Complete

Run Options: RunOptions_DNL

Result Storage Options:

Dispersion Results: None

Emissions Results: Case

Noise Results: Case

Emissions/Performance Modeling Options:

Weather Fidelity: ISA Weather

Check Track Angle: False

Apply Delay & Sequencing Model: False

Calculate Aircraft Engine Startup Emissions: False

Analysis Year (VALE):

BADA 4 Modeling Options:

Use BADA Family 4: Use ANP/BADA 3 only

Use ANP and BADA 3 Fallback: False

Enable reduced thrust taper: False

Reduced thrust taper upper limit:

Noise Modeling Options:

Atmospheric Absorption: Unadjusted (SAE-AIR-1845 atmosphere)

Lateral Attenuation: DisableLateralAttenuationToPropsAndHelos

Type Of Ground: Hard

Use Terrain: True

Noise Line Of Sight Blockage: False

Fill Terrain: False

Terrain Fill In Value:

Do Number Above Noise Level: False

Metric Result ID: 2

Metric Result Name: EXISTING RUNWAY

Metric Result Description:

Metric: DNL

Receptor Set: 80^2 GRID-EXISTING

Annualization: EXISTING

Run Start Time: 8/14/2023 2:16:07 PM

Run End Time: 8/14/2023 2:16:09 PM

Run Status: Complete

Run Options: RunOptions_DNL

Result Storage Options:

Dispersion Results: None

Emissions Results: Case

Noise Results: Case

Emissions/Performance Modeling Options:

Weather Fidelity: ISA Weather

Check Track Angle: False

Apply Delay & Sequencing Model: False

Calculate Aircraft Engine Startup Emissions: False

Analysis Year (VALE):

BADA 4 Modeling Options:

Use BADA Family 4: Use ANP/BADA 3 only

Use ANP and BADA 3 Fallback: False

Enable reduced thrust taper: False

Reduced thrust taper upper limit:

Noise Modeling Options:

Atmospheric Absorption: Unadjusted (SAE-AIR-1845 atmosphere)

Lateral Attenuation: DisableLateralAttenuationToPropsAndHelos

Type Of Ground: Hard

Use Terrain: True

Noise Line Of Sight Blockage: False

Fill Terrain: False

Terrain Fill In Value:

Do Number Above Noise Level: False

Metric Result ID: 3

Metric Result Name:

Metric Result Description:

Metric: DNL

Receptor Set: Sitka-ALL

Annualization: Root

Run Start Time: 10/6/2023 5:04:04 PM

Run End Time: 10/6/2023 5:04:09 PM

Run Status: Complete

Run Options: RunOptions_DNL

Result Storage Options:

Dispersion Results: None

Emissions Results: Case

Noise Results: Case

Emissions/Performance Modeling Options:

Weather Fidelity: ISA Weather

Check Track Angle: False

Apply Delay & Sequencing Model: False

Calculate Aircraft Engine Startup Emissions: False

Analysis Year (VALE):

BADA 4 Modeling Options:

Use BADA Family 4: Use ANP/BADA 3 only

Use ANP and BADA 3 Fallback: False

Enable reduced thrust taper: False

Reduced thrust taper upper limit:

Noise Modeling Options:

Atmospheric Absorption: Unadjusted (SAE-AIR-1845 atmosphere)

Lateral Attenuation: DisableLateralAttenuationToPropsAndHelos

Type Of Ground: Hard

Use Terrain: True

Noise Line Of Sight Blockage: False

Fill Terrain: False

Terrain Fill In Value:

Do Number Above Noise Level: False

Metric Result ID: 4

Metric Result Name:

Metric Result Description:

Metric: DNL

Receptor Set: Sitka-ALL

Annualization: EXISTING

Run Start Time: 10/6/2023 5:04:06 PM

Run End Time: 10/6/2023 5:04:10 PM

Run Status: Complete

Run Options: RunOptions_DNL

Result Storage Options:

Dispersion Results: None

Emissions Results: Case

Noise Results: Case

Emissions/Performance Modeling Options:

Weather Fidelity: ISA Weather

Check Track Angle: False

Apply Delay & Sequencing Model: False

Calculate Aircraft Engine Startup Emissions: False

Analysis Year (VALE):

BADA 4 Modeling Options:

Use BADA Family 4: Use ANP/BADA 3 only

Use ANP and BADA 3 Fallback: False

Enable reduced thrust taper: False

Reduced thrust taper upper limit:

Noise Modeling Options:

Atmospheric Absorption: Unadjusted (SAE-AIR-1845 atmosphere)

Lateral Attenuation: DisableLateralAttenuationToPropsAndHelos

Type Of Ground: Hard

Use Terrain: True

Noise Line Of Sight Blockage: False

Fill Terrain: False

Terrain Fill In Value:

Do Number Above Noise Level: False

User-defined noise spectral class data for one-third octave bands between 50 Hertz and 10,000 Hertz for bands 17-40

U.S. Department
of Transportation

**Federal Aviation
Administration**

AIRPORTS DIVISION

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

February 5, 2025

Lawrence Widmark
Chair
Sitka Tribe of Alaska
204 Siginaka Way
Sitka, Alaska 99835
Email: Lawrence.widmark@sitkatribe-nsn.gov, lisa.gassman@sitkatribe-nsn.gov, jeff.feldpausch@sitkatribve-nsn.gov

Dear Chairman Widmark:

In respect of your tribal sovereignty and in recognition of the Federal Aviation Administration's (FAA) trust responsibility to Federally Recognized Tribes, I am writing to update you on the FAA Alaskan Region Airports Division review of the City and Borough of Sitka's (CBS) application for federal assistance to be the sponsor of the proposed new Sitka Seaplane Base. The FAA last contacted you regarding this consultation in April 2024 and provided an update describing additional work being conducted to support the supplemental review under the National Environmental Policy Act (NEPA), including a revised noise analysis memorandum and providing additional funding for an additional cultural resources field inventory of the project APE, which was conducted by CBS' cultural resources consultant in the Spring of 2024.

The FAA is submitting this letter to you to provide an updated project description for the undertaking, high-level review of Section 106 milestones to date, summary of the results of the revised noise analysis memorandum, summary of the results of the additional field inventory of the project APE, and to present the revised and updated APE which takes into account information gleaned from the revised noise analysis memorandum and the updated project description.

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

Project Description
The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 1 and Figure 2). The proposed SPB would include a pile-supported trestle, a gangway, a landing float, a transient float, a based seaplane float, and, if needed, a floating wave attenuator north of the floats to attenuate waves from the main harbor entrance gap in the existing breakwater or southeast of the floats to attenuate waves from the channel to the south. Related actions include conducting land use authorization through acquisition

of the parcel where terrestrial components would be constructed and acquiring a tideland easement from the Alaska Department of Natural Resources (DNR).

As originally proposed in 2021, the project included the following Marine and Upland components:

Marine Components (1.65 acres)

- Seaplane float (350 x 46ft) with ramps for 14 based seaplanes (4 DE Havilland Beavers and 10 Cessna 206s)
- Transient Loading Float (200 x 30 ft) with capacity for four transient seaplanes (sized for DE Havilland Beavers)
- Drivedown gangway (120 x 12 ft)
- Float Gangway Landing float (120 x 46 ft)
- Pile-supported trestle (240 x 16 x 16 ft)
- Future Float Expansion (250 x 50 ft)
- Floating Wave Attenuator north and southeast (if required)
    - North (500 x 20 ft)
    - Southeast (600 x 20 ft)

Upland Base Parking Area and Approach (1.81 acres)

- Seaplane haul out ramp (230 x 30 ft)
- Utilities include electricity, water, and lighting
- 15 Parking spaces
- Security fencing (362 linear ft)
- Vegetative Buffer (0.3 acres)
- Access driveway (200 x 36 ft)
- Covered waiting area and eventual terminal area
- Fuel storage and access facilities
- Accommodations for future expansion, including aircraft maintenance facilities

Since 2021, the Project has been refined and updated and now includes the following Marine and Upland components:

Marine Components (0.97 acres)

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

Upland Base Parking Area and Approach (1.96 acres)

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

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

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

Previous Section 106 Consultation Milestones

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

Table 1: Section 106 Consultation Milestones

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

Area of Potential Effect (APE)

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

Summary of Revised Noise Analysis Memorandum

[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.

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

Previous Field Inventory Efforts

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

Summary of 2024 Additional Field Inventory

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

Based on this revised APE, additional inventory for historic properties at the existing seaplane base will be conducted to determine if the proposed deactivation and decommissioning of the existing seaplane base will result in adverse effects to historic properties. The FAA anticipates that this inventory will include an analysis of the eligibility of the existing seaplane base for listing in the National Register of Historic Places. The FAA has requested that the methods and results of

this analysis be included in the 2024 Field Survey report being prepared by CBS' cultural resources contractor.

Upon completion of these additional efforts described above, the FAA will update the finding of effect and will reengage consulting partners on the continued development of the MOA to resolve adverse effects to historic properties.

The FAA greatly appreciates your participation in the Section 106 consultation process, and we look forward to continued cooperation and collaboration. If you have any questions and would like to discuss the FAA's proposed path forward to continue the Section 106 process or engage FAA in government-to-government consultation, please contact Kendall Campbell, Alaska Region Airports Division, at the address above, at 907-271-5030, or by e-mail at *Kendall.D.Campbell@faa.gov*.

Sincerely,

Kendall D. Campbell
Regional Tribal Consultation Official
Cultural Resources Environmental Protection Specialist
Federal Aviation Administration
222 West 7th Avenue, MS #14
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Electronic cc:

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

Attachments:

Figures (6)
Revised Noise Analysis Memorandum (dated January 31, 2024)

References:

DOWL. 2021. *Determination of Eligibility Recommendation: Japonski Island Observation Post (SIT-01115), Sitka, Alaska.* Report prepared for the City and Borough of Sitka.

Sea Level Consulting. 2022. *Final Archaeological Monitoring Report for the Sitka Seaplane Base Geotechnical Explorations, Sitka Alaska*. Report prepared under contract to DOWL.

From:	Emily Creely
To:	Emily Creely
Subject:	G2G: Sitka Airport Utilities and Draft Noise Study - Information for Sept. 6 meeting
Date:	Wednesday, June 25, 2025 9:52:52 AM

From: Ponozzo, Kristi M (FAA) <Kristi.M.Ponozzo@faa.gov>
Sent: Friday, September 1, 2023 11:32 AM
To: 'lisa.gassman@sitkatribe-nsn.gov' <lisa.gassman@sitkatribe-nsn.gov>; 'Feldpausch, Jeff' <jeff.feldpausch@sitkatribe-nsn.gov>
Cc: Bordley, Lawson S (FAA) <Lawson.S.Bordley@faa.gov>; Campoamor, Jessica L (FAA) <Jessica.L.Campoamor@faa.gov>; Campbell, Kendall D (FAA) <Kendall.D.Campbell@faa.gov>
Subject: Sitka Airport Utilities and Draft Noise Study - Information for Sept. 6 meeting

Lisa,

Attached are meeting materials for the Sept. 6th meeting. There is a presentation in the Airport Utilities Project and plan sheets to accompany that proposed project. There is also a draft updated Noise Study associated the proposed Sitka Seaplane Base project for your review and feedback.

We look forward to meeting with you next week and have reserved time after the meeting to accompany any of the counsel or staff on a field tour of either of these projects, if there is interest.

Thank you,

Kristi Ponozzo
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