Appendix D2:

DOE and Findings(f)

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THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
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March 24, 2021

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

SENT BY E-MAIL
DATE 3-24-21

Jack Gilbertsen
Lead Environmental Protection Specialist
Alaska Regional Office
Federal Aviation Administration
jack.gilbertsen@faa.gov

Subject: Sitka Seaplane Base

Dear Mr. Gilbertsen:

The Alaska State Historic Preservation Office (AK SHPO) received your request for concurrence via email on March 3, 2021 regarding the subject project and report titled *Determination of Eligibility Recommendation: Japonski Island Observation Post (SIT-01115) Sitka, Alaska* on February 2, 2021. The AK SHPO has entered tolling in response to COVID-19. Per ACHP direction, responses received from our office should be considered by the federal agency after the 30-day time periods outlined in 36 CFR 800 until our office has returned to normal status. Our office has reviewed the referenced undertaking under Section 106 of the National Historic Preservation Act.

Following our review of the documentation provided, we concur that the Japonski Observation Post (SIT-01115) is eligible for the National Register of Historic Places (NRHP) under Criterion A and C. As such, we concur that a finding of adverse effect is appropriate for the proposed undertaking.

We look forward to working with your office to resolve the adverse effect through the development of a Memorandum of Agreement (MOA). Please note that the agency official shall notify the Advisory Council of the adverse effect finding (36 CFR 800.6[a][1]).

Thank you for the opportunity to comment. Please contact Sarah Meitl at sarah.meitl@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

Judith E. Bittner
State Historic Preservation Officer

JEB:sjm

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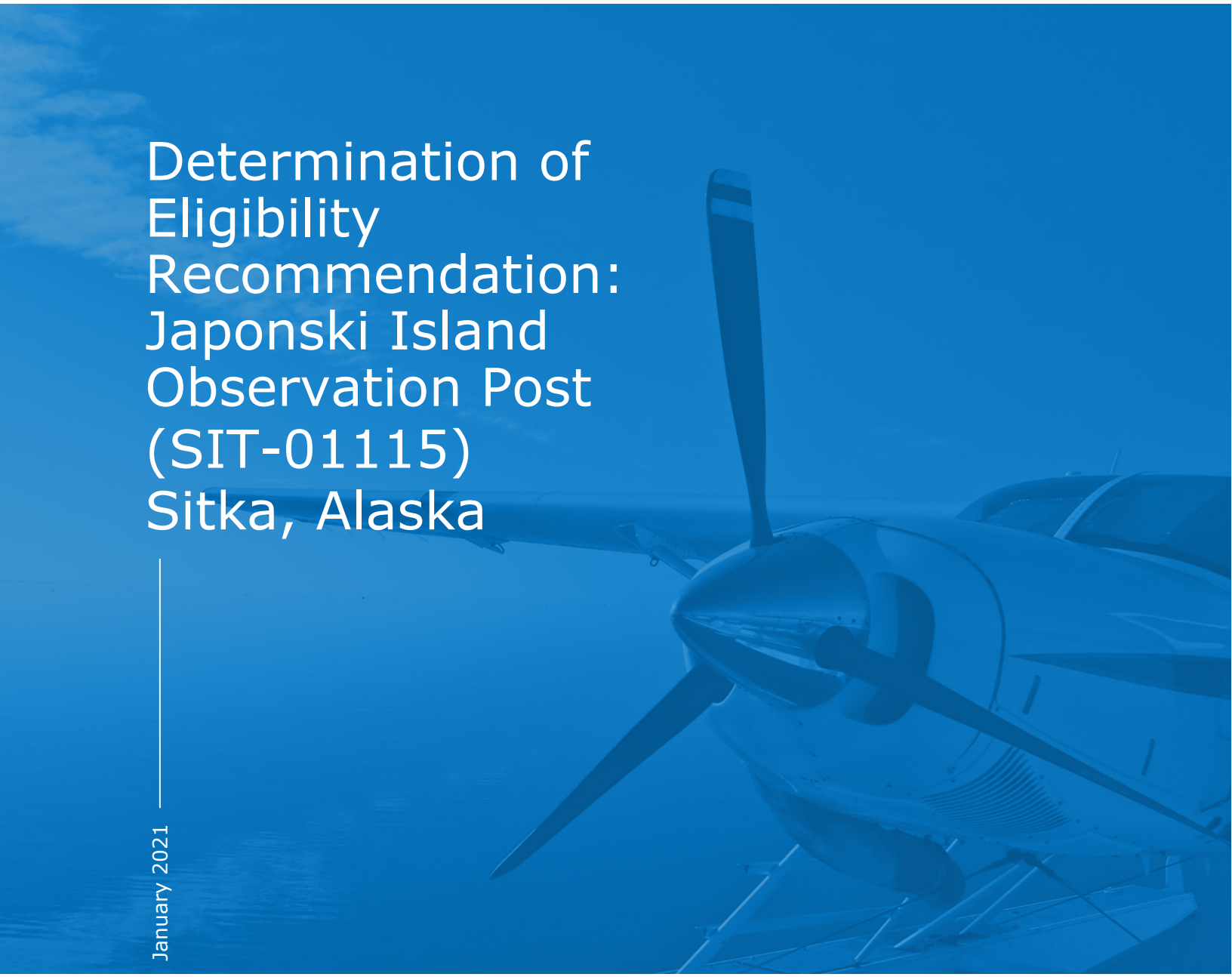
CITY & BOROUGH OF SITKA



Determination of Eligibility Recommendation: Japonski Island Observation Post (SIT-01115) Sitka, Alaska

January 2021

PREPARED FOR:

U.S. Department of Transportation
Federal Aviation Administration
Alaskan Region, Airports Division
222 West 7th Avenue

ON BEHALF OF THE SPONSOR:

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Contents

RESTRICTED DATA NOTICE

Site-specific information for cultural resources described in this report is restricted and confidential under the provisions of the Archaeological Resources Protection Act and the National Historic Preservation Act. Sharing this information is limited to those with a legitimate need to know, such as appropriate personnel from agencies and authorized investigators. This report is not a public document. Do not disseminate.

Project Description

The City and Borough of Sitka (CBS) owns and operates the Sitka Seaplane Base (Federal Aviation Administration [FAA] identifier A29). A29 is located on Sitka Channel between Thomsen and ANB harbors (Figure 1); it has been operating at its current site for 65 years and is at the end of its useful life. CBS, in cooperation with FAA, is proposing a new seaplane base on Japonski Island.

The new Sitka seaplane base would be located on a 2.02-acre parcel at the end of Seward Street on the northeast end of Japonski Island (Figure 2). The upland parcel where the facility is proposed would be acquired by CBS from the Alaska Department of Education and Early Development (ADEED) and is adjacent to the U.S. Coast Guard (USCG) Air Station Sitka. The Project would require fill in Sitka Channel to reduce the length and cost of gangways to access the marine facilities.

CBS will acquire the marine area for the seaplane base from the Alaska Department of Natural Resources (DNR). The CBS has submitted to DNR an application for conveyance of state-owned tidelands and submerged lands for the facility and received a preliminary approval. The marine component of the facility would include a pile-supported trestle, a gangway, a loading and maneuvering 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 and/or southeast of the floats to attenuate waves from the channel to the south.

The 2016 Siting Analysis identified a potential demand for up to 19 based aircraft and 15 transient aircraft if all of the desired support facilities were available at a new seaplane base. Given that CBS may need to construct the new seaplane base in phases and may not be able to accommodate all facilities requested initially, it was determined that the proposed site would accommodate 14 based aircraft and four transient aircraft.

The proposed facility would include:

- Seaplane float (350 feet by 46 feet) with ramps for 14 based seaplanes (4 DE Havilland Beavers and 10 Cessna 206s)
- Transient seaplane float (220 feet by 30 feet) with capacity for four transient seaplanes (sized for DE Havilland Beavers)
- Drive-down gangway (120 feet by 16 feet) and landing float (120 feet by 46 feet) for access to seaplane floats
- Pile-supported trestle (240 feet by 16 feet) with 50-foot turn-out lane at gangway
- Wave attenuators on the north and southeast (if required)
- Vehicle parking area (15 parking spaces)
- Electricity, water, and lighting for the seaplane floats
- Covered waiting area and eventual terminal area
- Safe access between the parking positions and the water operating area
- Fuel storage and access facilities

- Upland seaplane tie-downs, future maintenance facilities and hangars, and maneuvering room
- Seaplane haul out ramp
- Security fencing
- Landscape buffer along southern boundary
- Accommodations for future expansion

Project Location

The City of Sitka is located on Baranof Island in the Northern Pacific Ocean. The Island was home to the Tlingit Indians before its settlement by Russians in the mid-eighteenth century. It served as the capital of the Russian America Territory and was a major center for the United States military during World War II. Sitka continues to be a center for fishing, trade, services, and tourism in Southeast Alaska. The Project will be constructed on a parcel on Japonski Island, across Sitka Channel from Baranof Island. The proposed site is currently owned by the State of Alaska, Department of Education and Early Development (ADEED).

Area of Potential Effects

The area of potential effects (APE) is defined as the that area within which direct and indirect impacts may occur to archaeological, historical, and or cultural resources as a result of proposed Project activities. The combined direct and indirect APE includes areas subject to ground disturbance, construction activities (including placement of fill), noise, vibration, increased traffic and other potential impacts, and spans 250 feet from Project components (Figure 3). Due to the topography of the site, and the planned excavation and lowering of the upland portion of the Project, the APE does not extend into the U.S. Coast Guard properties to the west. Direct and indirect impacts from the Project are unlikely to adversely affect cultural resources in these areas as they are topographically separated from the Project components (Figure 4).

Methods

Assessment methods for this project included both a desktop review and on-site survey. DOWL consulted the Alaska Heritage Resources Survey (AHRS) for recorded resources in and near the APE, the National Register of Historic Places (NRHP), and National Historic Landmarks databases maintained by the National Park Service (NPS). In addition, DOWL reviewed previous surveys and other literature to inform background study for the Project, and archival materials to assist in analysis of cultural resources within the APE.

Literature Review and Archival Research

Prior to fieldwork, the Integrated Business Suite (IBS) Portal database at the State of Alaska, Department of Natural Resources, Office of History and Archaeology (OHA) was reviewed to determine the extent of

previous cultural resource work in the area. The purpose of the file search was to identify any previous cultural resources studies, and documented historic buildings, structures, objects, or historic districts located near the subject buildings, or if the subject buildings were potentially part of a historic district. In addition, reports and documentation not readily available on file at OHA were obtained from digital libraries and online archives and reviewed for relevance to the project.

Field Survey Methods

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; see Attachment A). Ms. Kennedy meets the Secretary of the Interior's Professional Standards for History (48 Federal Register [FR] 44738-9, September 29, 1983). Due to confusion regarding landownership data obtained prior to fieldwork, DOWL did not obtain a State Cultural Resources Investigation Permit (SCRIP) from OHA to conduct this survey[1]. However, no subsurface disturbance or testing was conducted as part of the investigation. The purpose of the condition assessment was to ascertain the building's dimensions, overall condition, and designed purpose.

The survey adhered to the guidance provided in *National Register Bulletin #24 – Guidelines for Local Surveys: A Basis for Preservation Planning* prepared by the NPS and the *Alaska Historic Buildings Survey Manual and Style Guide* prepared by the OHA (NPS 1984; OHA 2016). The building was evaluated for inclusion in the NRHP by following guidelines set forth in *National Register Bulletin #15 – How to Apply the National Register Criteria for Evaluation* (NPS 1997).

The exterior and interior of the building was documented and photographed, with attention given to those elements that may qualify it for inclusion in the NRHP. Visible alterations and changes over time were noted, as well as possible changes to interior wall configuration. No materials and/or artifacts observed within or around the building were collected.

Results

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 II-era military facilities. These and other relevant documents/studies are listed in Attachment B. None of the included studies appear to have documented SIT-01115, although some documents describe similar, more elaborate structures (Alaska Department of Natural Resources 2012).

[1] Confusion regarding landownership stemmed from a right-of-entry agreement between CBS and DEED which authorized "field studies" on DEED lands; thus CBS and DOWL incorrectly assumed that a SCRIP was not required. DOWL has corrected this internal communication breakdown, and any future work on lands managed by DEED will be conducted under an executed SCRIP.

Historic Context

Numerous reports have detailed the cultural chronology of the Sitka area: see in particular the Sitka Historic Preservation Plan (Pollnow and DeArmond 2010; Pollnow et al. 2017). The history of military buildup and operations during World War II are likewise discussed at length in supporting documentation for the Sitka Naval Operating Base and U.S. Coastal Defenses National Historic Landmark (National Park Service 2020). Sitka Naval Operating Base (NOB) was originally established as an advance seaplane base in 1937 and was designated a NOB in 1942. During World War II planes operating out of the Sitka NOB patrolled southeast Alaska and the Gulf of Alaska. Sitka NOB also provided critical defense for shipping in the Gulf of Alaska. Beginning in 1941 the U.S. Army established Forts Ray, Rousseau (which replaced Fort Ray as the headquarters for coastal defense in 1943), Pierce, and Babcock to provide defensive support to the Sitka NOB. As part of this effort the Army also constructed the Coastal Defense Network, a system of armaments and fortifications to protect Sitka Sound and associated Naval facilities. Sitka NOB was closed by the Navy in 1944 (Bush 1944; Conn et al. 1941; Hanable and Ponko Jr. 1983; National Park Service 2020).

The Sitka NOB and U.S. Army Coastal Defenses National Historic Landmark (NHL) was designated in 1986 for its role in World War II defenses in Alaska and the Aleutian Islands. The NHL is comprised of Sitka NOB and Fort Rousseau, including associated U.S. Army Coastal Defenses on eight islands. The NPS is currently in the process of updating the 1986 nomination to account for changes to the NHL, including demolition or rehabilitation of buildings, and improved documentation of contributing features (National Park Service 2020).

Previously Recorded Cultural Resources Listed in the Alaska Heritage Resources Survey

Ten documented cultural resources are located within 500 feet of the APE. Table 1 provides information on sites listed in the Alaska Heritage Resources Survey (AHRS) within 500 feet of the APE. One, the Sitka NOB and U.S. Coastal Defenses NHL (SIT-00079) is listed on the NRHP. Four buildings associated with the military buildup on Japonski Island that have not been evaluated for NRHP eligibility but are considered contributing buildings to the NHL are within 500 feet of the APE (Figure 5). Five additional buildings/structures are located within 500 feet of the APE but are located outside of the NHL boundary and are not considered contributing features (these cultural resources are shown in grey in Table 1).

Table 1* AHRS Sites *within 500 Feet of APE

AHRS No.	Site Name	DOE Status
SIT-00079	Sitka Naval Operating Base and U.S. Army Coastal Defenses National Historic Landmark	NHL-Listed
SIT-00479	Small Arms and Pyrotechnic Magazine No. 1, Building No. 83	None
SIT-00481	FUSE AND DETONATOR NO. 12	None
SIT-00485	SMALL LOG MAGAZINE	None
SIT-00492	LOG RUIN #3	None
SIT-00579	Building 201 Married Officers Quarters	Contributing

SIT-00580	Building 202 Married Officers Quarters	Contributing
SIT-00581	Building 203 Married Officers Quarters	Contributing
SIT-00582	Building 204 Married Officers Quarters	Contributing
SIT-00583	Building 205 Officers Recreation, Totem Club	Contributing
SIT-00585	Building 207 Married Officers Quarters	Contributing
SIT-00607	Building 212 Bachelor Officers Quarters	Contributing
SIT-00648	Mount Edgecumbe School[2]	None

Building Documentation

SIT-01115 consists of a concrete building within the APE and is overall rectangular in shape with a slightly off-center observation slit situated on the north wall (Figure 6). There is a single entrance (Figure 7). The observation slit, which is roughly 16" in height, offers 180-degree views of Sitka Channel. At one time the observation slit had three upright metal supports. The walls range in thickness from approximately 12" to 20". The interior dimensions are irregular due to the observation slit and measure roughly 8.667ft (104") by 13.25ft (159"), or 115 square feet. Approximate interior dimensions are depicted in Figure 8. There are wooden boards set high on the interior walls and along the observation slit. Construction also included some earthworks, evidenced by a collapsed covered trench on the south side, and stone reinforcements on the north (Figure 9).

Condition

The exterior of the building is slightly discolored and heavily overgrown with vegetation. The vegetation, which would have been entirely or partially cleared during use, has become overgrown, obscuring the seaward view. The building also shows some signs of spalling on the northwest side, possibly a result of deflection, or weakness caused by erosion (Figure 10). Wooden boards set high on the interior walls, which may have been used to mount brackets for electrical wiring, show some moisture damage but are otherwise in fair condition. The concrete at the door and observation slit shows some deterioration, likely from erosion. The metal pipe supports for the observation slits are heavily corroded (in one case, entirely corroded), which has resulted in slight spalling of the surrounding concrete (Figure 11).

Archival Materials

DOWL's review of archival materials (including maps and narrative descriptions of installation) yielded no documentation of SIT-01115 (Bush 1944; Conn et al. 1941; U.S. Army 1944), nor did previous surveys of the area. Initial research indicated that, based on the building's location, it may have been constructed as a Base End Station. Base End Stations similar to this building were used to triangulate the position and distance of enemy craft to guide artillery fire. The position of this building in relation to a battery of 90mm Anti Motor Torpedo Boat guns constructed at Watson Point supports this hypothesis (Berhow 2020). Unfortunately, the available records associated with the artillery at Watson Point do not

[2] AHRS has labeled and mapped this structure in a different location than the current Mt. Edgecumbe School.

include this building (U.S. Army 1944, Figure 12). Moreover, the lack of mount points for azimuth instruments or depression position finders further indicate that this was not the designed purpose for the building.

It is more likely that this building was constructed by Marine or Army infantry as part of series of small coastal fortifications that used to ring Japonski, Alice and Charcoal Islands. These small defensive positions would have been second priority defensive positions, which, depending on whether actively engaged with the enemy would have ranged from foxholes and trenches to more elaborate concrete buildings such as this (U.S. War Department 1941a:16–18; 1941b:280–288). Construction of aboveground defensive positions and observation posts during World War II were used under various circumstances, including when groundwater levels prevented construction of cut-and-cover shelters. Reinforced concrete was preferred for aboveground shelters to offer protection from enemy fire. Surface shelters provided "maximum observation and exit facility" and could be further hidden from view and reinforced with layers of earth (U.S. War Department 1940:206–219).

Determination of Eligibility – Applying National Register Criteria for Evaluation

Section 101 of the National Historic Preservation Act (NHPA) (16 USC 470a[a]) established the National Register to catalog historic properties significant in American history, architecture, archaeology, engineering, and culture. NHPA defines "historic properties" as prehistoric and historic districts, sites, buildings, structures, and objects listed or eligible for inclusion on the NRHP including artifacts, records, and material remains related to the property (16 USC 470w, Sec. 301.5). Consideration is given to both the criteria of significance and integrity of the site condition. The evaluation should consider the historic context of the property, including its relation to other known historic properties.

Consideration of National Register Criteria for Evaluation

The NRHP (36 Code of Federal Regulations [CFR] 60.4) outlines the criteria (A-D) for determining the eligibility for a historic property as follows:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

> *(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or*
>
> *(b) that are associated with the lives of persons significant in our past; or*
>
> *(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values,*

or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) that have yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4).

Criterion A: Association with Significant Events

To be considered significant under Criterion A, a property "must be associated with one or more events important in the defined historic context," (NPS 1997:12). The military buildup of Sitka during World War II necessarily required interplay between the Army and the Navy. Planes operating out of the Sitka NOB patrolled southeast Alaska and provided critical defense for shipping in the Gulf of Alaska. Beginning in 1941 the U.S. Army established nearby forts to provide defensive support to the Sitka NOB. The Army also constructed the Coastal Defense Network, a system of armaments and fortifications to protect Sitka Sound and associated Naval facilities.

SIT-01115 fits within the historic context for construction during World War II as its function was essential to the coastal defense mission of the military installations at Sitka NOB and Fort Rousseau (R. Christopher Goodwin and Associates 1997). Moreover, SIT-01115 shows the interplay between branches of the military as observation posts such as SIT-01115 would have been built by Army infantry as part of the defensive strategy to protect Sitka NOB. Although no longer a part of a recognizable defensive and observation ring that would have formerly surrounded the Sitka NOB and Coastal Defenses NHL, SIT-01115 does represent a portion of the tactical considerations and strategies employed using a range of defensive buildings and structures, other examples of which are still intact within the NHL. Therefore, DOWL recommends that SIT-01115 is significant under Criterion A.

Criterion B: Association with Lives of Significant Persons

To be considered for listing under Criterion B, a property must be "associated with individuals whose specific contributions to history can be identified and documented" (NPS 1997:14). The observation post is not connected to a person of significance in the past and therefore DOWL recommends that SIT-01115 is not significant under Criterion B.

Criterion C: Distinctive Characteristics of a Type, Period, or Method of Construction

To be considered for listing under Criterion C, a property must "embody distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic value; or, represent a significant and distinguishable entity whose components may lack individual distinction" (NPS 1997:17). Although the ruins of several concrete structures are extant in the Sitka NOB and U.S. Coastal Defenses NHL, this building is one of two intact observation posts of this type on Japonski, Alice, and Charcoal islands (M. Hunter personal communication to C. Kennedy [DOWL], August 7, 2020). The data currently available does not allow for comparative assessment of the design, style, and construction methods of SIT-01115 against other observation posts in Sitka. SIT-01115 is, however, constructed to military specifications typical of the period of significance, and shares features, design,

and construction methods used in other similar (although functionally different) buildings and structures, such as pill boxes. As mentioned above, SIT-01115 and similar buildings/structures are not accounted for in available documentation, so the total number and locations of other observation posts and similar buildings cannot be determined at present. The ruins of several similar concrete buildings/structures have been documented around former Sitka NOB and Ft. Rousseau.

SIT-01115 is a well-preserved example of standardized WWII military design and style with adaptive modifications to construction methods and materials based on the conditions and location in which it was constructed. DOWL therefore recommends that SIT-01115 is significant under Criterion C.

Criterion D: Potential to Yield Important Information in prehistory or History

To be considered for listing under Criterion D, a property must have the potential to answer, "important research questions about human history [that] can only be answered by the actual physical material of cultural resources" (NPS 1997:21). SIT-01115 was built using standard plans and material known to be common to the period in which it was constructed. It is not likely to yield important information that has not already been recorded and therefore DOWL recommends that SIT-01115 is not significant under Criterion D.

Consideration of Integrity

As outlined in 36 CFR § 60.4, in order to be considered eligible for the NRHP a property must retain sufficient integrity to convey its significance in American history, architecture, archaeology, engineering, or culture. There are seven aspects of integrity – location, design, setting, materials, workmanship, feeling, and association. The property must also convey its historic identity through retention of essential physical features. Essential physical features enable the property to convey its historic identity; the features represent *why* and *when* a property was significant.

If a property is significant for the NRHP under Criterion A, it should retain the essential physical features "that made up its character or appearance during the period of its association with the important event" (NPS 1997:46). And while design and workmanship may not be as vital, the integrity of location, setting, materials, feeling, and association should ideally be retained. If a property is significant for the NRHP under Criterion C, it should retain the essential physical features which characterize the type, period, or method of construction that the property represents. The vital aspects of integrity are design, workmanship, and materials, while location, setting, feeling, and association may not be as important in conveying the property's significance. (NPS 1997:48; Table 2).

Table 2 Essential Features of Integrity under Criterion A

Criterion	Essential Feature	Vital Aspects of Integrity	Integrity Lost If:
A	The property must retain evidence of World War II character	Property must maintain integrity of Location, Setting, Materials, Feeling, and Association	Property has been moved after period of significance (Location), substantially altered, including use of new materials and changes to physical character (Materials, Feeling, and Workmanship), or no longer retains basic design features that convey their historic appearance or function (Design)
C	The property must retain distinctive characteristics representative of the purpose for which it was constructed during World War II	Property must retain integrity of Design, Workmanship, Materials, and Feeling	Property has lost essential features such as walls, roofs, and doors are substantially altered (Design), considerable amounts of new materials have been introduced (Materials and Workmanship), or has been moved such that it no longer conveys its original function and purpose (Feeling)

To retain integrity of *location*, a property must be located where it was originally constructed or where the historic event occurred (NPS 1997:44). SIT-01115 is positioned in the original location it was designed to observe, and DOWL therefore recommends that SIT-01115 retains integrity of location.

To retain integrity of *design*, a property must have its original "form, plan, space, structure, and style" (NPS 1997:44). Although no photographs of this building were located during archival research, the building retains design typical of similar structures constructed during World War II. Therefore, DOWL recommends that the building retains integrity of design.

To retain integrity of *setting*, the character of the physical environment and the surroundings "in which the property played its historical role" must be maintained (NPS 1997:45). The view from SIT-01115 has been partially obscured by overgrowth, but the overall physical environment has not changed since World War II. Therefore, DOWL recommends that SIT-01115 retains integrity of setting.

To retain integrity of *materials*, a property "must retain the key exterior materials dating from the period of its historic significance" (NPS 1997:45). SIT-01115 has not been altered with new materials since its construction during World War II and therefore DOWL recommends that SIT-01115 retains integrity of materials.

To retain integrity of *workmanship*, a property must demonstrate the "labor and skill in constructing" a structure and "furnish evidence of the technology of a craft [and] illustrate the aesthetic principles of a historic… period" (NPS 1997:45). The construction materials and methods used to construct the observation post conform to documented specifications defined in military literature from the period of significance. Although weather-worn, the observation post is intact enough to demonstrate the labor and skill its construction required; therefore, DOWL recommends that SIT-01115 retains integrity of workmanship.

To retain integrity of *feeling*, a property must demonstrate a "presence of physical features that, taken together, convey the property's historic character" (NPS 1997:45). Most of the physical features at the observation post are intact, although the nearby defensive trench is obscured by vegetation. With the exception of the defensive trenching around the observation post, which are obscured by overgrowth, the observation post retains almost all physical features that indicate its use during World War II; therefore, DOWL recommends that SIT-01115 retains its feeling.

To retain integrity of *association*, a property must have a "direct link" with an important historic event. It "retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer" (NPS 1997:45). SIT-01115 retains the majority of its structural materials and proximity to the Sitka NOB and Coastal Defenses NHL. Taken alone (e.g. in the absence of the NHL), this observation post would not necessarily be able to convey its association with World War II. The proximity to the NHL and extensive documentation of the military operations on Japonski Island and surrounding Sitka area, however, strongly support integrity of association. Therefore, DOWL recommends that SIT-01115 retains integrity of association.

SIT-01115 meets the conditions for NRHP significance under Criterion A and C. Furthermore, it remains in its original location and construction materials typical of the period. Despite showing wear from decades of disuse, it still neatly conveys its original purpose as one of a series of observation stations that once dotted the coastline of Sitka NOB and other Coastal Defenses. Although the ruins of several concrete structures are extant in the Sitka Naval Operating Base and U.S. Coastal Defenses NHL, this building is one of two intact observation posts of this type on Japonski, Alice, and Charcoal islands (M. Hunter personal communication to C. Kennedy [DOWL], August 7, 2020).

Because SIT-01115 retains its essential physical characteristics and the vital aspects of integrity that would allow "a historical contemporary [to] recognize the property as it exists today" (NPS 1997:48), DOWL recommends that the observation post should be considered eligible for the NRHP, and that it should also be determined a contributing feature to the Sitka Naval Operating Base and U.S. Army Coastal Defenses NHL. SIT-01115 retains integrity of location, design, materials, feeling, setting, workmanship, and association as defined by the nomination of the NHL. Although the 1986 and drafted update of the NHL nomination do not include this or any other similar buildings, there is precedent for inclusion of the Base End Station/observation station as a contributing feature to the NHL. Other State and National Historic Landmarks (such as the Aleutian Islands World War II National Historic Area and Fort Rousseau Causeway State Historical Park), and state recreation areas (such as Caines Head State Recreation Area in Seward) have undertaken preservation and/or interpretive measures for similar World War II features.

Preliminary Assessment of Effect

Consistent with 36 CFR 800.5(a), DOWL recommends that the proposed Project would have a direct adverse effect on SIT-01115 by destroying the building as part of the construction of the new sea plane base, thus altering the aspects of integrity which qualify it for listing in the NRHP.

Preliminary consultation with NPS suggests that potential adverse effects to the NHL resulting from the Project include indirect effects such as increased noise, traffic, and changes to the setting of nearby World War II structures. The Project proposes to minimize these impacts through marine delivery of construction materials to avoid heavy truck traffic through the NHL, lowering of the site elevation for the upland portion of the seaplane base and incorporating a landscape buffer at the existing end of Seward Avenue to reduce potential for visual impacts, and realigning the orientation of the marine structures to reduce the potential for visual effects.

Summary and Recommendation

During field survey in May 2020, DOWL documented SIT-01115, which is entirely within the Project APE. DOWL recommends that SIT-01115 is significant under Criteria A and C, that it retains the necessary aspects of integrity to convey this significance, and therefore is eligible for listing in the NRHP. DOWL further recommends that SIT-01115 is a contributing property to the Sitka NOB and U.S. Coastal Defenses NHL. The construction of the Project will require the demolition of SIT-01115, constituting an adverse effect to a historic property; therefore, DOWL recommends a finding of "adverse effect" to historic properties consistent with 36 CFR 800.5(d)(2), and further recommends that CBS, SHPO, NPS, and DOWL consult to resolve adverse effects consistent with 36 CFR 800.6.

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

1941a *Basic Field Manual Coastal Defense (FM 31-10)*. U.S. Government Printing Office, Washington, D.C.

1941b *Staff Officer's Field Manual: Organization, Technical and Logistical Data (FM 101-10)*. U.S. Government Printing Office, Washington, D.C.

Figures

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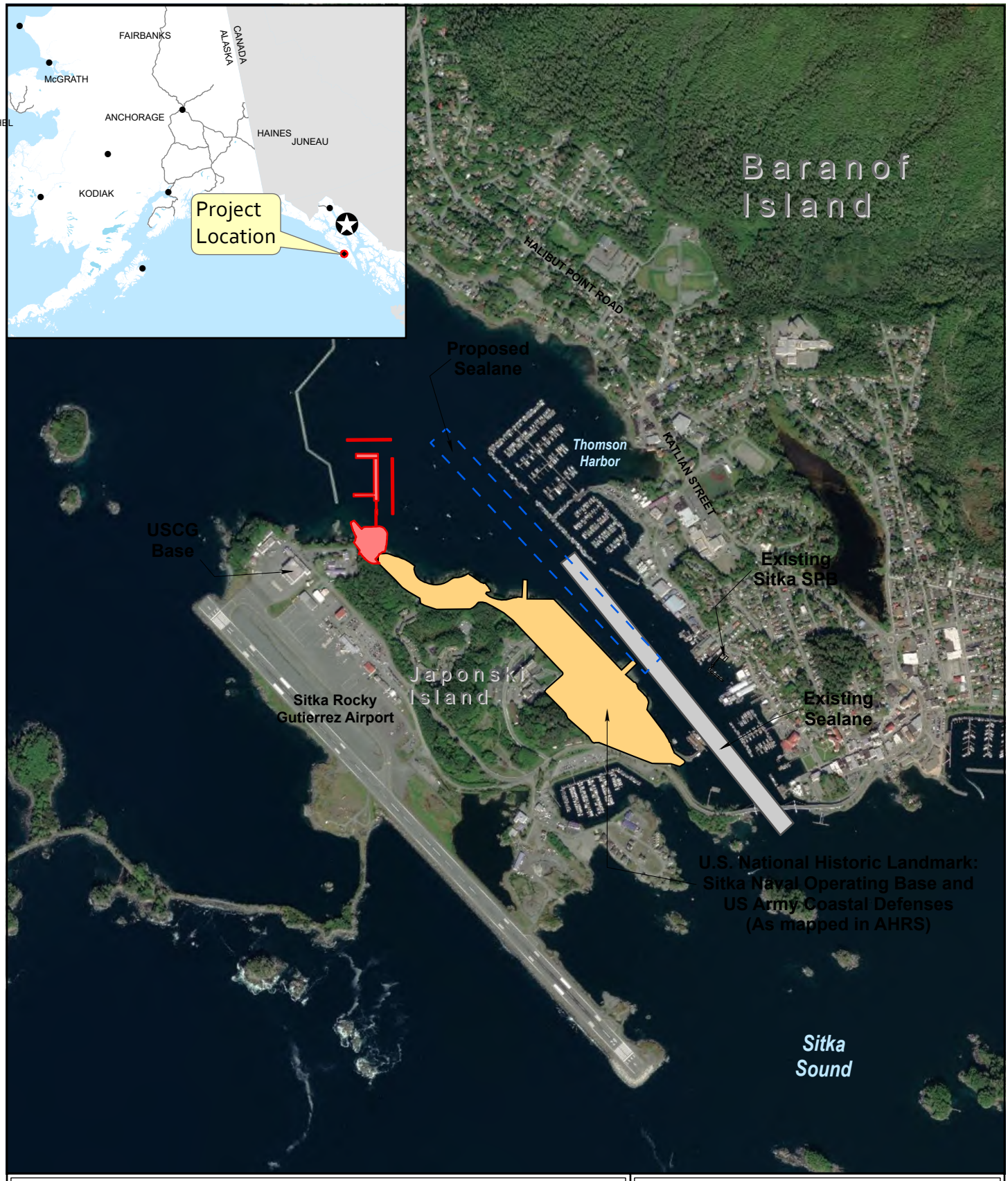

Preliminary Project Footprint

N

Feet
0 1,000 2,000

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

Location & Vicinity Map

Sitka Seaplane Base
Environmental Assessment

Figure 1 | Date: November 12, 2020

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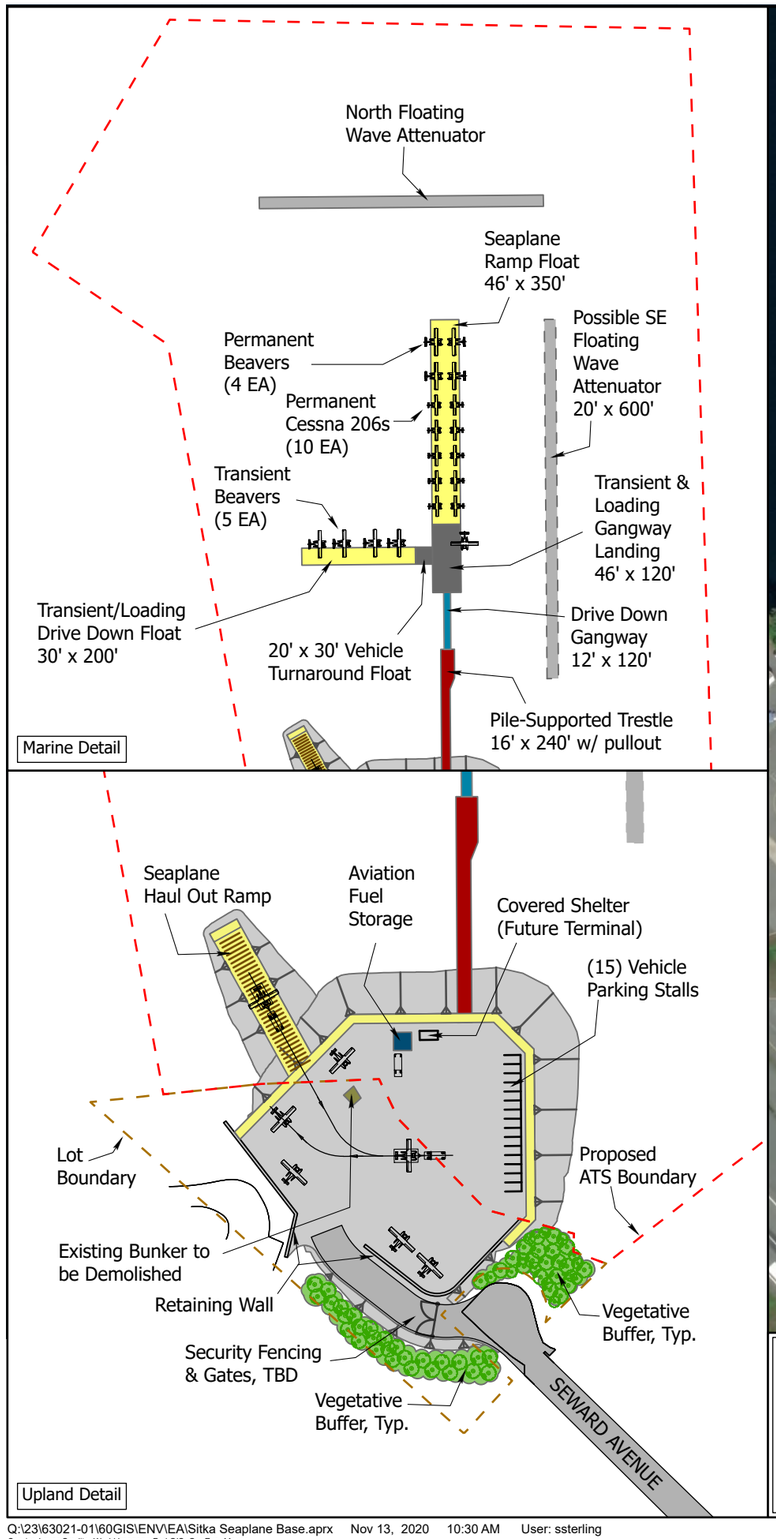
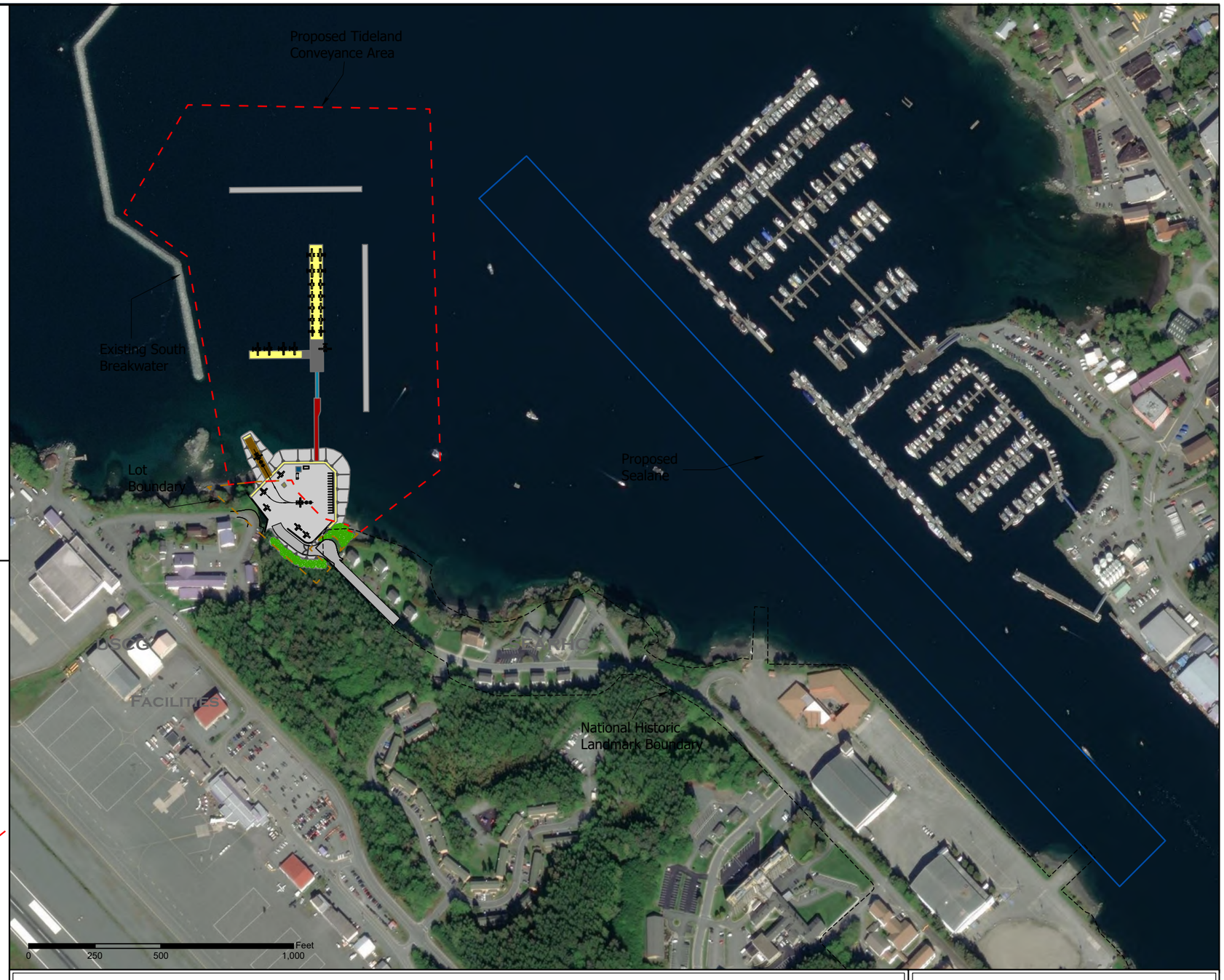
Service Layer Credits: World Imagery: Fed GIS, GeoEye, Maxar





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

N

Proposed Action

Sitka Seaplane Base
Environmental Assessment

Figure 2 | Date: November 13, 2020

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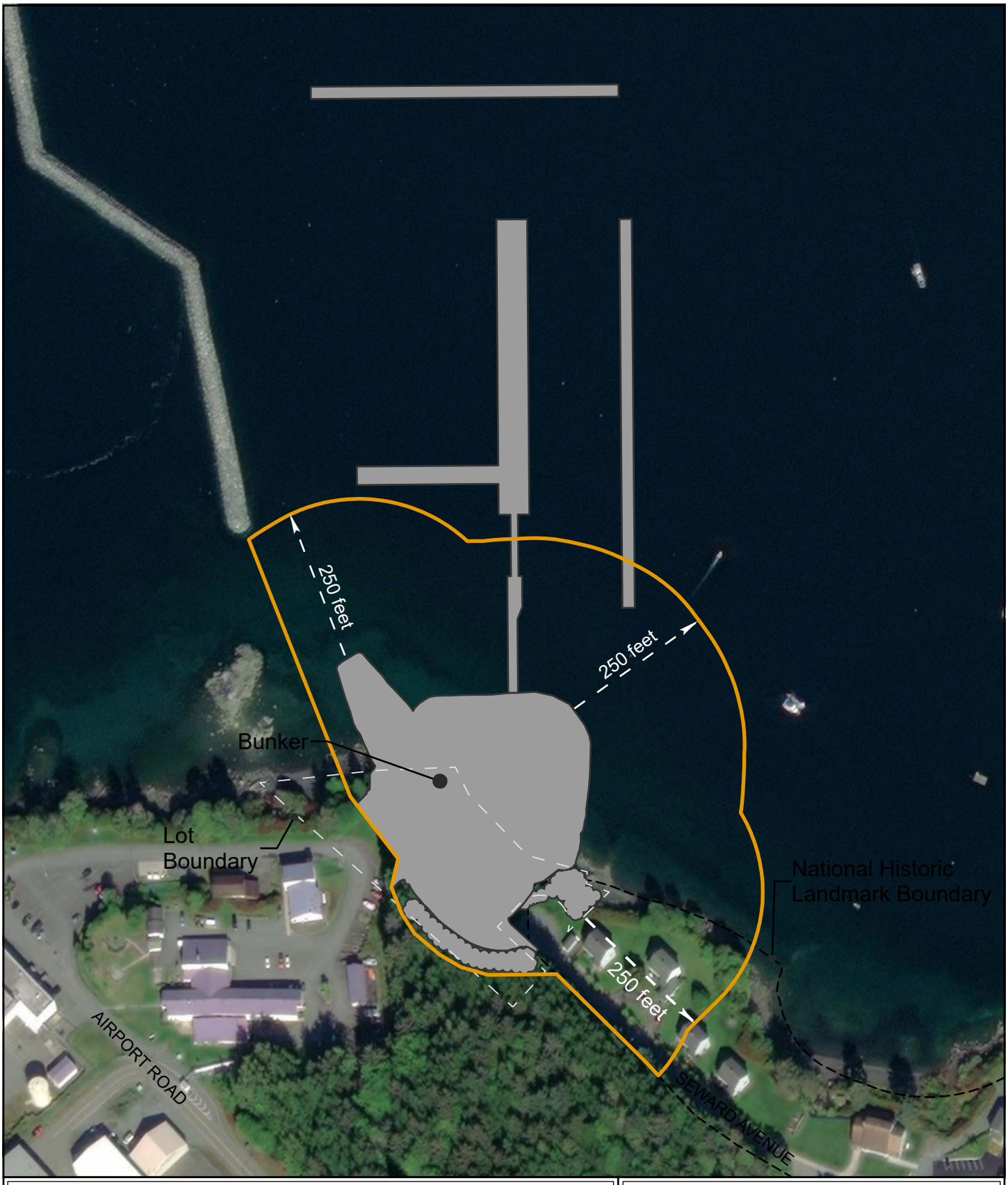
Service Layer Credits: World Imagery: Fed GIS, GeoEye, Maxar



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

Figure 3 | Date: November 19, 2020

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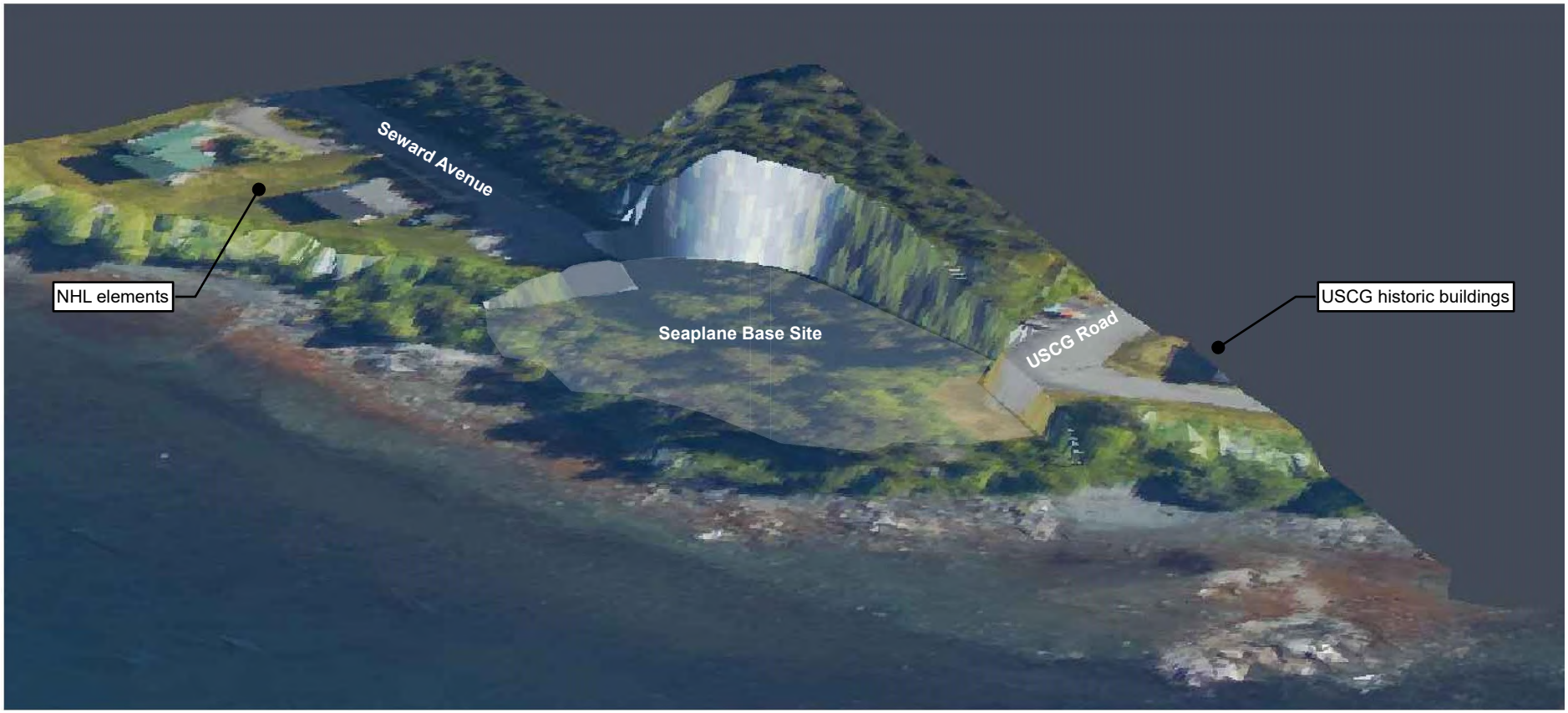
Service Layer Credits: World Imagery: Fed GIS, GeoEye, Maxar



Note: This rendering is a visual representation of the elevation differences between the proposed project finished site and other historic structures/areas. The image is not to scale and may not accurately show distances between various structures/features.

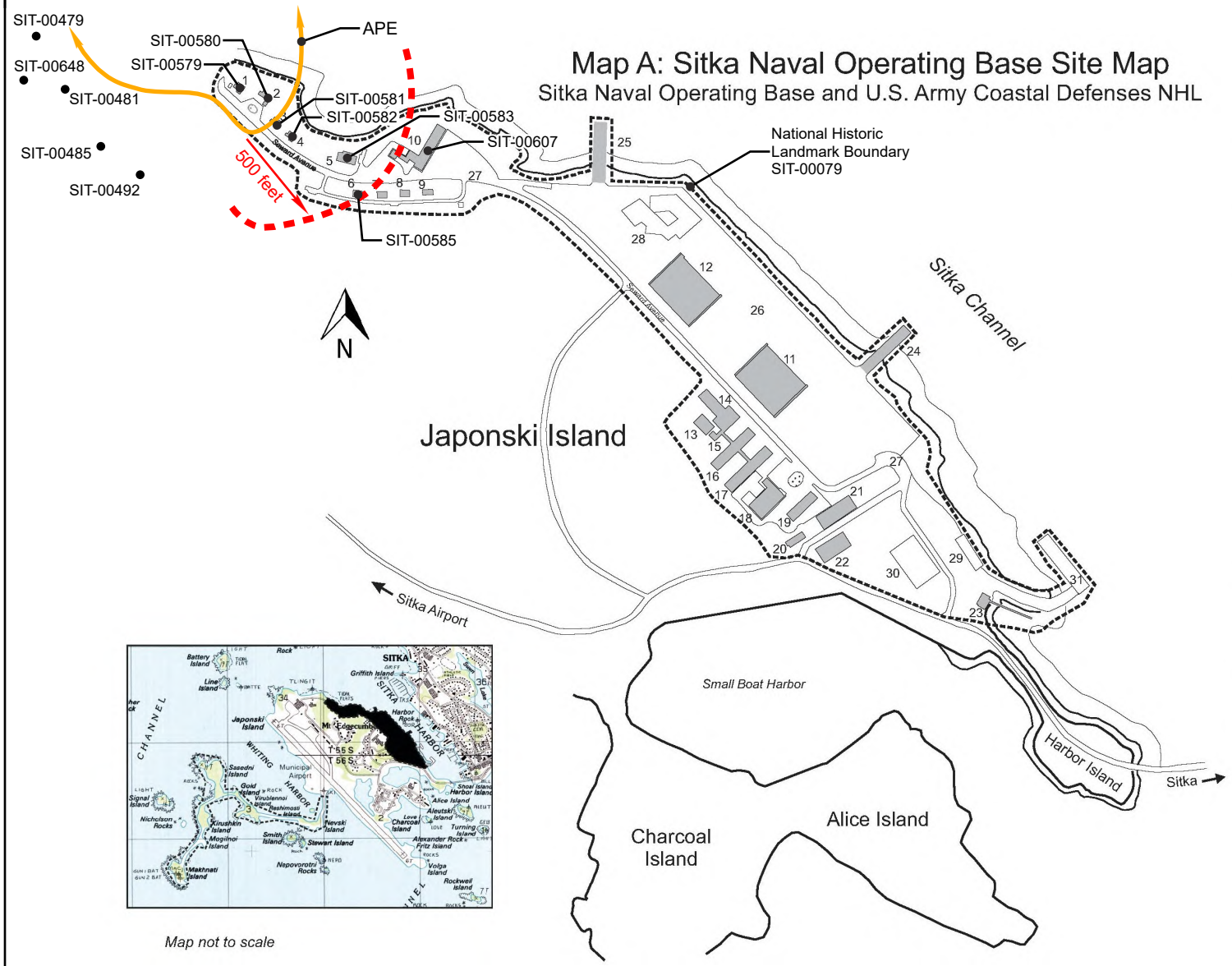
Rock Cut Topographic Rendering

Sitka Seaplane Base
Environmental Assessment

Figure 4 | Date: December 09, 2020

Map A: Sitka Naval Operating Base Site Map

Sitka Naval Operating Base and U.S. Army Coastal Defenses NHL



Map not to scale

Contributing

1. Married Officers Quarters, Building 201
2. Married Officers Quarters, Building 202
3. Married Officers Quarters, Building 203
4. Married Officers Quarters, Building 204
5. Officers Recreation, Totem Club, Building 205
6. Married Officers Quarters, Building 207
7. Married Officers Quarters, Building 208
8. Married Officers Quarters, Building 209
9. Married Officers Quarters, Building 210
10. Bachelor Officers Quarters, Building 212
11. Seaplane Hangar No. 1, Building 331
12. Seaplane Hangar No. 2, Building 332
13. Cold Storage Building, Building 289
14. Mess Hall & Bakery, Building 290
15. Brig, Building 291
16. Barracks, Building 292
17. Barracks, Building 293
18. Enlisted Men's Recreation Facility, Building 295
19. Administrations and Operations Building, Building 297
20. Bomb Proof Communications Center, Building 298
21. Commissary, Cold Storage, and Laundry Building, Building 2
22. Torpedo Shed, Garage and Shop, Building 301
23. Boathouse, Building 309
24. Seaplane Ramp No. 2
25. Seaplane Ramp No. 1
26. Airfield
27. Sitka Naval Operating Base Road System

Non-contributing

28. Mt. Edgecumbe School
29. Coast Guard CST Building
30. Mt Edgecumbe High School Aquatic Facility
31. U.S. Coast Guard Dock

Contributing Buildings and Structures
Contributing Sites
Non-contributing Properties
National Historic Landmark Boundary

NHL Contributing Buildings within 500 Feet of APE

Sitka Seaplane Base
Environmental Assessment

Figure 5 | Date: November 23, 2020

Observation Slit Dimensions

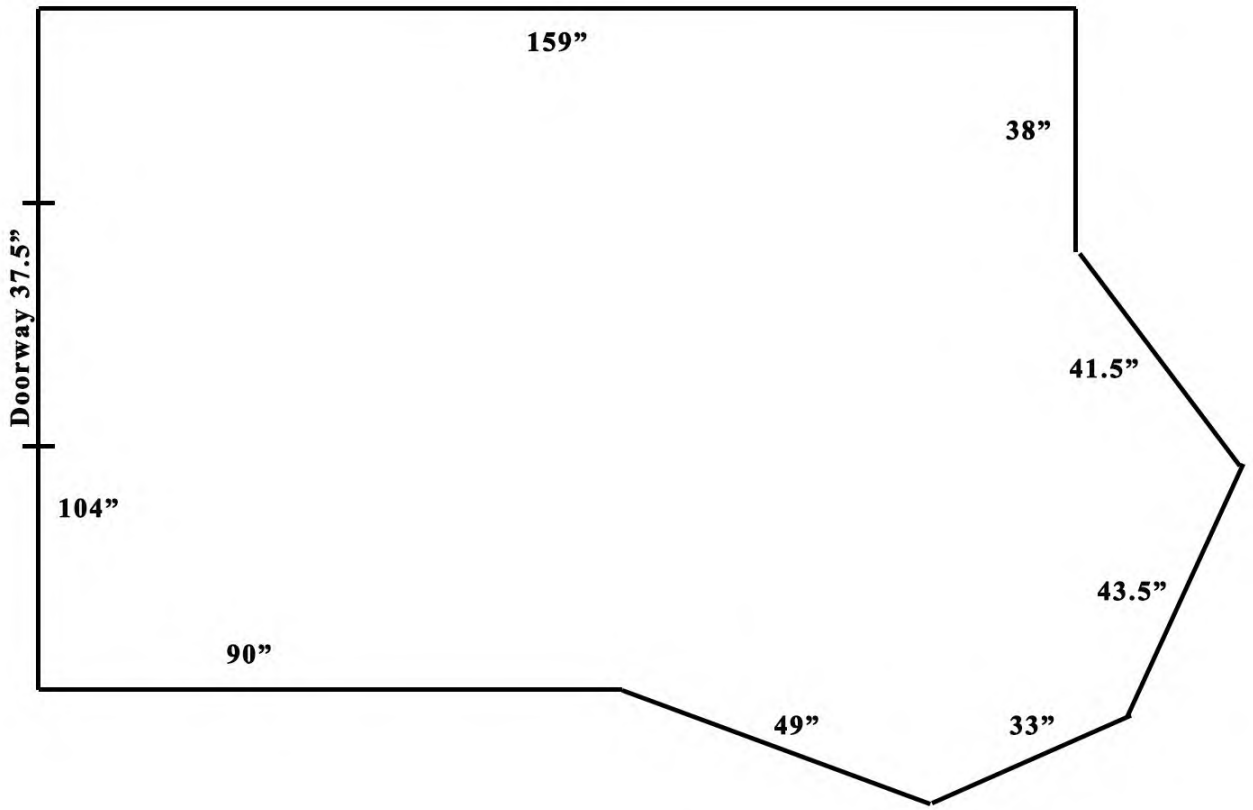
Sitka Seaplane Base
Environmental Assessment

Figure 6 | Date: November 12, 2020

Entry Dimensions, Internal

Sitka Seaplane Base
Environmental Assessment

Figure 7 | Date: November 12, 2020



Interior Dimensions

Sitka Seaplane Base
Environmental Assessment

Figure 8 | Date: November 12, 2020

Ground Support, North (Seaward) Side

Sitka Seaplane Base
Environmental Assessment

Figure 9 | Date: November 12, 2020

Light Spalling on NW Exterior Wall

Sitka Seaplane Base
Environmental Assessment

Figure 10 | Date: November 12, 2020

Remains of Window Support, Spalling

Sitka Seaplane Base
Environmental Assessment

Figure 11	Date: November 12, 2020

Battery at Watson Point

Approximate Location of Building

Source: Supplement to the Harbor Defense Project, Harbor Defenses of Sitka: Annex B

As-Built Map

Sitka Seaplane Base
Environmental Assessment

Figure 12 | Date: November 19, 2020

Attachments

Attachment A – SIT-01115 AHRS Card

Alaska Heritage Resources Survey Site Form

Date Received:

Alaska Department of Natural Resources, Office of History and Archaeology
550 W. 7th Ave., Suite 1310 Anchorage, AK 99501-3565
Phone: (907) 269-8718; Fax (907) 269-8908
http://www.dnr.state.ak.us/parks/oha/index.htm

1. **Type of Form**: New

2. **AHRS Number**: SIT-01115

3. **Site Name**: Japonski Island Observation Post

4. **Description**: The observation post consists of a concrete building on the proposed site and is rectangular in shape with a slightly off-center observation slit situated on the north wall. There is a single entrance. The observation slit, which is roughly 16” in height, offers 180-degree views of Sitka Channel. At one time the observation slit had three upright metal supports. The walls range in thickness from approximately 12” to 20”. The interior dimensions are irregular due to the observation slit and measure roughly 8.667ft (104”) by 13.25ft (159”), or 115 square feet. There are wooden boards set high on the interior walls and along the observation slit. Construction also included some earthworks, evidenced by a collapsed covered trench on the south side, and stone reinforcements on the north. The exterior of the building is slightly discolored and heavily overgrown with vegetation. The surrounding vegetation, which would have been entirely or partially cleared during use, has become overgrown, obscuring the seaward view. The building also shows some signs of spalling on the northwest side, possibly a result of deflection, or weakness caused by erosion. Wooden boards set high on the interior walls, which may have been used to mount brackets for electrical wiring, show some moisture damage but are otherwise in fair condition. The concrete at the door and observation slit shows some deterioration, likely from erosion. The metal pipe supports for the observation slits are heavily corroded (in one case, entirely corroded), which has resulted in slight spalling of the surrounding concrete.

5. **Cultural Significance**: Recommended Eligible under Criterion A (Pending SHPO and NPS concurrence as of 1/12/21)

6. **Associations**: Sitka Naval Operating Base and U.S. Coastal Defenses NHL (SIT-00079)

7. **Location Information**: Northeast end of Japonski Island, Sitka, Alaska

8. **Location Reliability**: Location Exact and Site Existence Verified (1)

9. **AHRS Resource Nature**: Building

10. **Resource Nature Subtype**: Default Building

11. **Resource Keywords**: Military feature, observation post

12. **Site Area (Acres):** <0.5

13. **Period Codes**: Historic

14. **Associated Dates**: WWII-era

15. **Cultures**: U.S. Military; WWII-era

16. **Prehistoric/Historic Function**: n/a

17. **Current Function**: Abandoned

18. **Condition Code**: Normal state of weathering, undisturbed by vandalism, construction or abnormal weathering such as flooding or earthquakes (A)

19. **Destruct Codes**: None Reported

20. **Destruct Year**: N/A

21. **Owner Info**: City and Borough of Sitka

22. **Source Reliability**: Professional Reports, Records, and Field Studies (A)

23. **Form Author**: Caity Kennedy, DOWL

24. **Date Completed**: 1/13/2021

25. **Record Status**: Complete

26. **Other Number(s)**: n/a

27. **Artifact Repository**: n/a

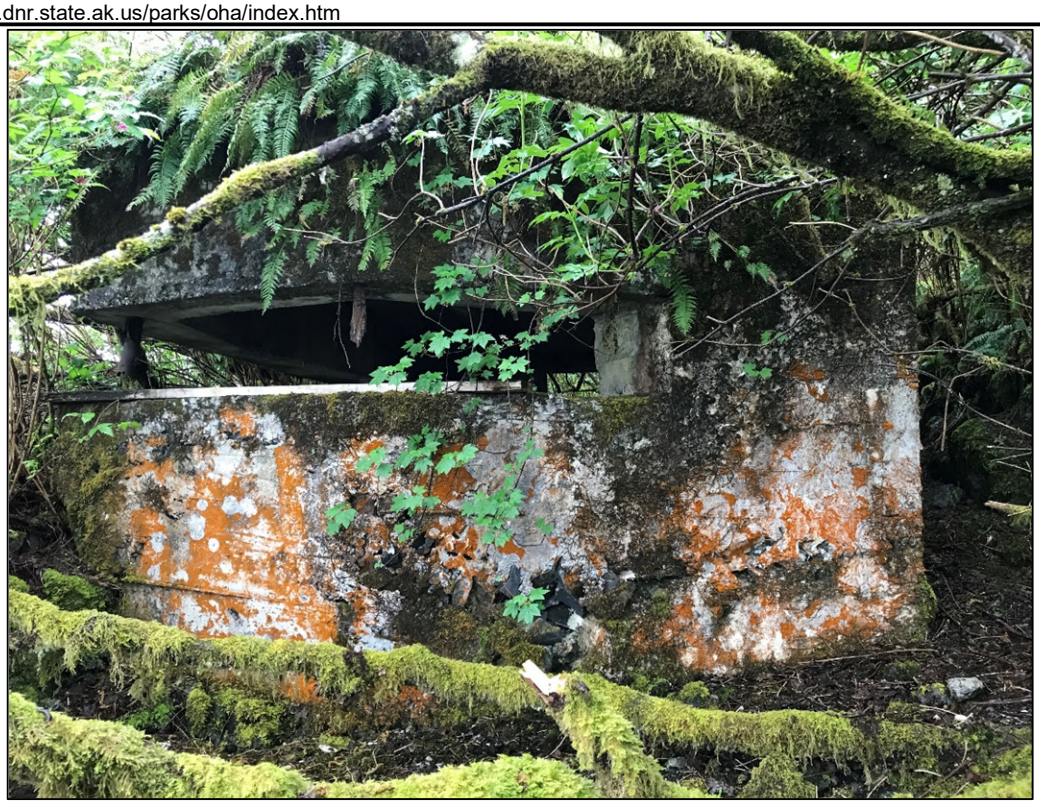
28. **Attachments** (File Name): n/a

29. **Location Information** (Decimal Degrees, NAD 83 Datum):
Latitude: 57.0559237 Longitude: -135.3646789

30. **Attach a portion of appropriate Aerial Photograph and U.S.G.S Quad Map:** See Figure 1: Aerial Photograph and Figure 2: U.S.G.S Quad Map.

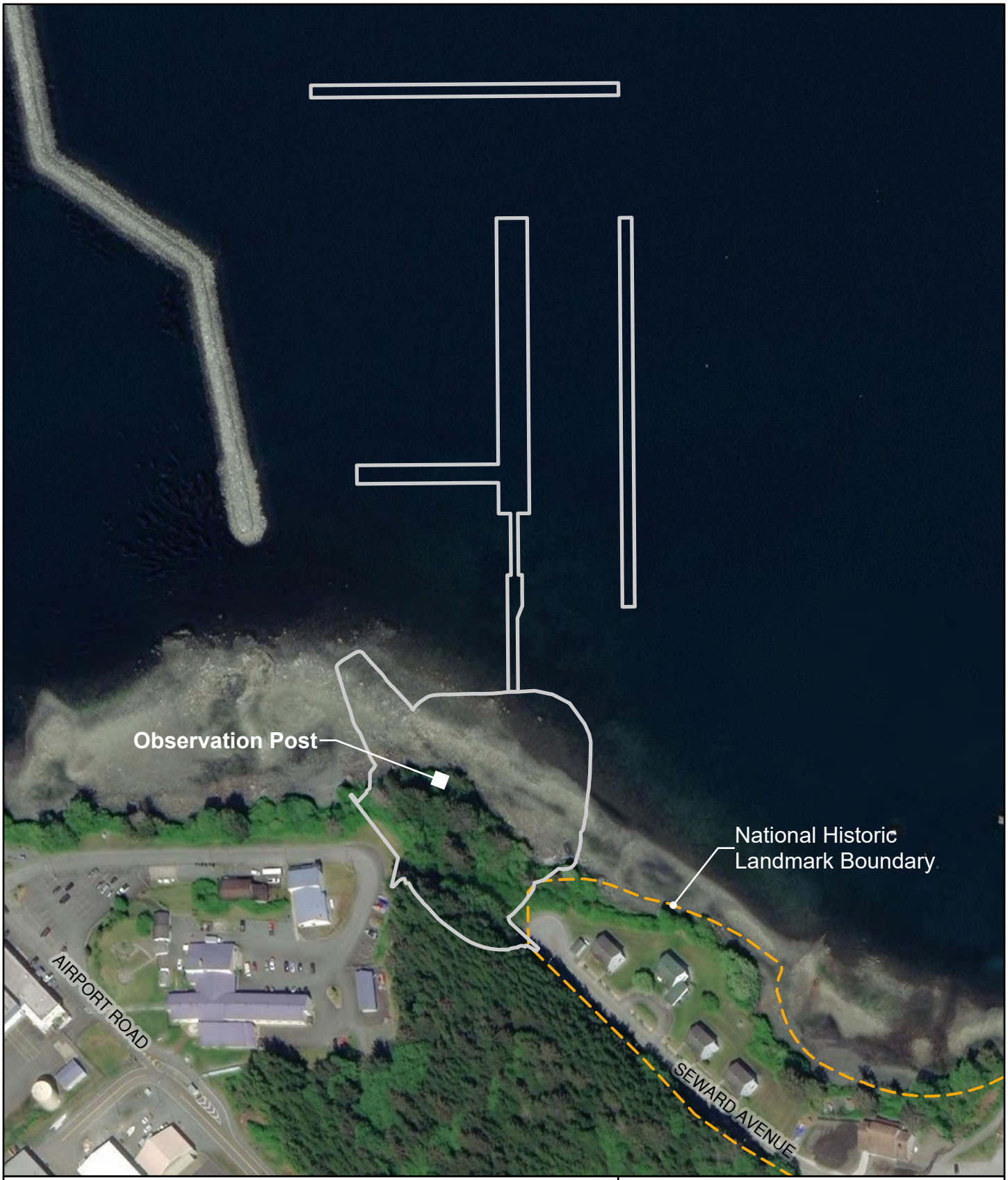
31. **Summary Artifact Table:** n/a

32. **Representative Site Photos:** See below



Photograph 1: Northwest Exterior of Observation Post (May 2020)

Photograph 2: Interior of Observation Post (May 2020)



Project Footprint

National Historic Landmark Boundary

N

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

0 150 300 Feet

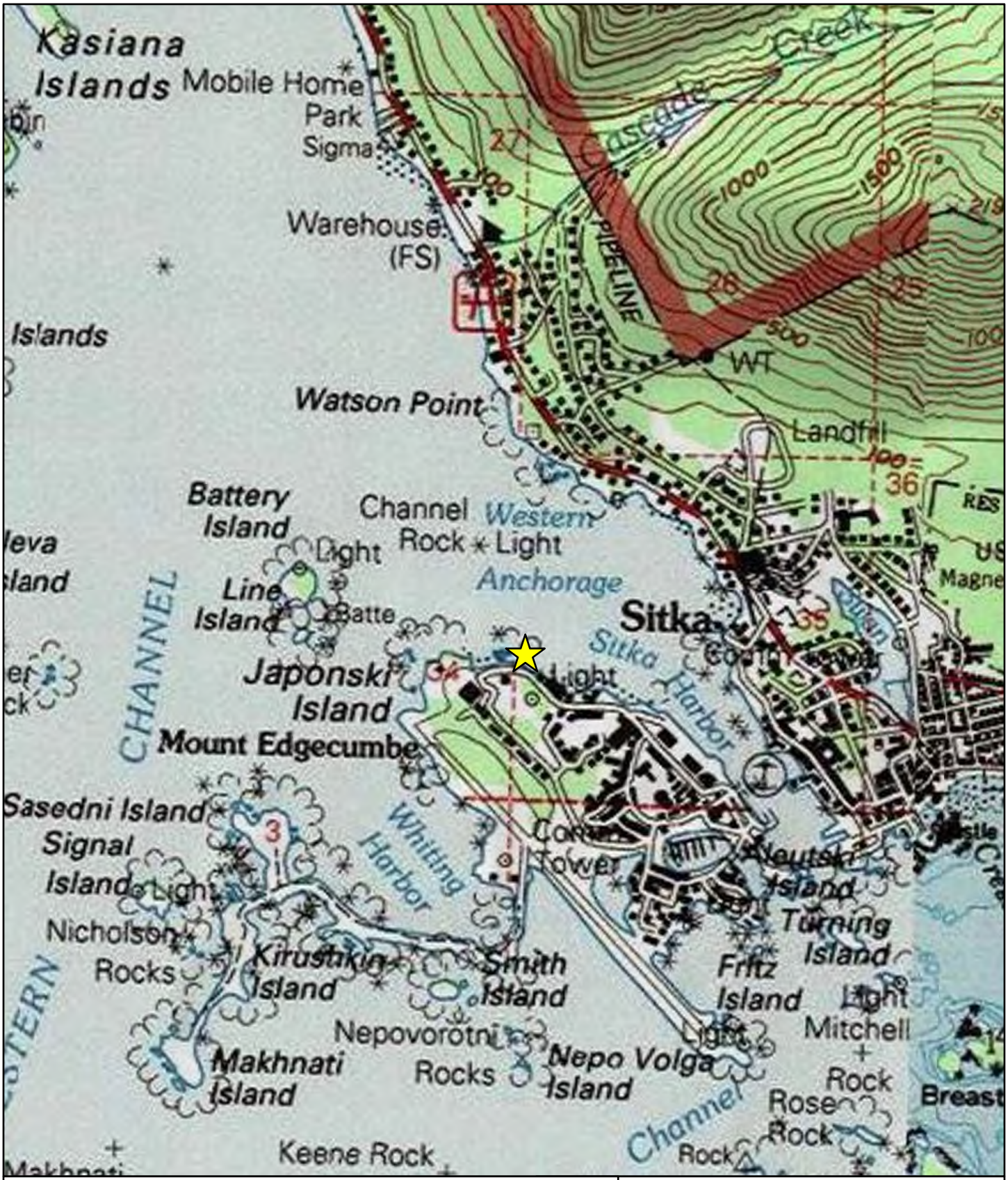
Aerial Photograph

Sitka Seaplane Base

Figure 1 | Date: January 12, 2021

Q:\23\63021-01\60GIS\ENV\EA\Cultural Resources.aprx Jan 12, 2021 3:48 PM User: ssterling

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



Observation Post Location

N

Feet
0 1,000 2,000

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

U.S.G.S Quad Map

Sitka Seaplane Base

Figure 2 | Date: January 12, 2021

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Service Layer Credits: USA_Topo_Maps: Copyright:© 2013 National Geographic Society, i-cubed

Attachment B - Previous Surveys near Project APE

Level	Document	Reference
Level IIB - Architectural	Structural Evaluation of Mount Edgecumbe School Buildings 290, 292, 293, 295, 297, 331, 332	Bettisworth et al. 1984
Level I - Literature Review	National Historic Landmarks Program, Review of Alaska Properties	Keel 1984
Level I - Literature Review	Assessment of Impact on Mt Edgecumbe School	BIA 1985
Level IV - Mitigative	Draft Memorandum: NHL and Section 106 Actions for Mt Edgecumbe School	Lind 1986
Level II - Reconnaissance Survey	Defense Environmental Restoration Account Inventory Report for Fort Rousseau, Sitka, AK	Anton and Henslee 1986
Level I - Literature Review	Letter RE: Sitka Airport Access Road Project #69277	Faulkner 1993
Level II - Reconnaissance Survey	Archaeology and Historicity Study of Air Station Sitka, Sitka Alaska	Onat 1995
Level I - Literature Review	Inventory of Historic Sites and Structures, City and Borough of Sitka, Alaska, Part II, Site Index and Inventory Forms	Betts and Longenbaugh 1997
Level I - Literature Review	Correspondence, ADOT/PF Proposed Removal of Mermaid Cove Mausoleum/WWII Ammunition Bunker (SIT-00565)	Sundberg 2000
Level I - Literature Review	Statement of Significance for the Fort Ray Historic District (Charcoal and Alice Islands) and the Mermaid Cove Mausoleum, Sitka, Alaska: Sitka Safety Area Improvement, Phase I, Project 72038	Yarborough 2000
Level I - Literature Review	Building 212 Renovations (SIT-00563)	Harritt 2000
Level IV - Mitigative	“Journey Back Home" Relocation Synopsis, Final: Sitka Airport Safety Improvements Phase I, Grave Relocation, AK Project No. 72038, Federal AIP#3-02-0268-0800	Yarborough 2000
Level I - Literature Review	A Determination of Eligibility to the National Register of Historic Places, Mount Edgecumbe Medical Center, SIT-571	Campbell 2001
Level IIB - Architectural	Ammunition Magazine Historical Recordation, Fort Ray Historic District, for the Sitka Airport Safety Improvements, Phase I, Sitka, Alaska	Gillette 2001
Level IIB - Architectural	A Survey of Historic Buildings Associated with the Sitka Naval Operating Base, Southeast Alaska Regional Heath Consortium Campus, Sitka Alaska, March 2002	Lane 2002
Level I - Literature Review	Revised Boundary of the Sitka Naval Operating Base	Lewis 2002

Level I - Literature Review	Letter Report Re Magnetic Resonance Imaging (MRI) Addition to Mount Edgecumbe Medical Center, Sitka	Campbell 2003
Level IIB - Architectural	A History and Description of Mermaid Cove Mausoleum, Sitka, Alaska	Dunning and Welsh 2003
Level I - Literature Review	Draft Phase I Site Assessment Report for Fort Rousseau Formerly Used Defense Sites	Keres 2003
Level IV - Mitigative	Sitka Safety Area Improvements Phase 1	Sundberg 2003
n/a	Japonski Island Boathouse Adaptive Re-Use, Final Schematic Design, Sitka, Alaska, HPF Grant 03410	Welsh Whitely 2004
Level I - Literature Review	Letter Report Re Underwater Communications Cable Removal	McConnell 2004
Level IV - Mitigative	Alaska, Our Last Frontier in Time of Peace, Our First Front in War: An Interpretation and Description of Fort Ray, Alaska	Dunning and Welsh 2004
Level I - Literature Review	Letter Report Re Removal of Contaminated Soil at the Sitka Naval Operating Base in Sitka, Alaska	McConnell 2005
Level IIB - Architectural	Sitka Airport Access Historical Evaluation, Sitka, Alaska, Project No. 68187	Gillette 2005
n/a	Letter RE: Sitka Airport Access Improvements	Bittner 2006
n/a	Letter and Plans Re Proposed Repair to The Japonski Island Boathouse Foundation	Welsh Whitely 2006
Level I - Literature Review	Letter RE: Clean up Sitka Airstation and Impacts to SIT479	Grover 2007
Level I - Literature Review	A Historical, Architectural, Archaeological, and Cultural Resource Assessment for Proposed Improvements to the Sitka Rocky Gutierrez Airport, Sitka, Alaska	Ellis 2008
Level I - Literature Review	Letter Report RE: Hospital Building Renovations (SIT-571)	Harritt 2010
n/a	Sitka Historic Preservation Plan: A Guide to Cultural Resource Management	Pollnow 2010
Level I - Literature Review	Letter Report RE: Sitka Tribe of Alaska Transit Bus Maintenance Facility Project Lot 11, Alice and Charcoal Island Subdivision, Alaska, Request for Concurrence with Area of Potential Effect and Finding of No Effect	Gehrke 2011
Level I - Literature Review	Letter Report RE: SEARHC Interior Renovations of Mount Edgecumbe High School Heritage Hall Building 295 (SIT-00598)	Lundgren 2011
Level IIB - Architectural	Japonski Island Boathouse Phase 1 Renovation and Adaptive Reuse Plan	North Wind Architects, LLC 2011
n/a	2010 Fort Rousseau Causeway State Historic Park Preservation Plan	DNR 2012
Level I - Literature Review	Letter RE: MEHS Old Powerhouse Building Demolition	Mahoney 2012
Level IIB - Architectural	Historic American Buildings Survey (HABS) Photographs, Old Powerhouse, Mt.	Arend 2012

	Edgecumbe High School (MEHS), Sitka, Alaska	
Level IV - Mitigative	Memorandum of Agreement for Removal of Searchlight Station No. 10 Debris, Lisianski Point, World War II Base End and Searchlight Stations of Sitka Sound Booklet	Pierce and Pollnow 2015
Level IV - Mitigative	Demolition of the Maintenance Storage Shed, Construction of the Mt. Edgecumbe High School Aquatic Center Project, and Inadvertent Discovery of SIT-1069	Krauthoefer 2016
n/a	The Sitka Historic Preservation Plan	Pollnow, Ditmar, and Littlefield 2017
Level IIB – Architectural	Historic Properties Survey, Evaluation, and Determination of Eligibility for the National Register of historic Places of Four Public Health Service Buildings, Mt. Edgecumbe Medical Center Campus, Sitka, Alaska	True North Sustainable Development Solutions, LLC 2017