Appendix D3:

Revised Section 4(f)

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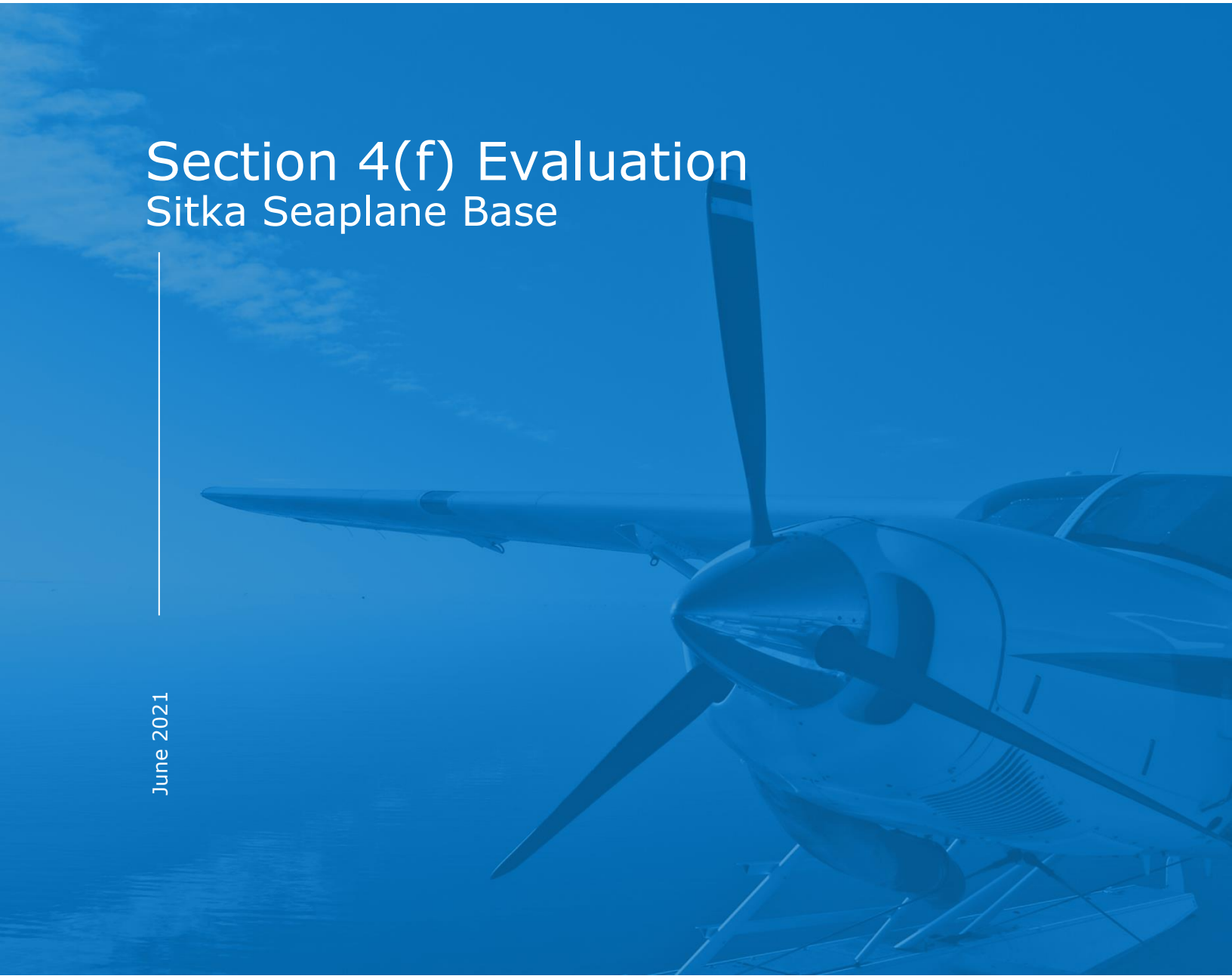
CITY & BOROUGH OF SITKA



Section 4(f) Evaluation
Sitka Seaplane Base

June 2021

PREPARED FOR:
U.S. Department of Transportation
Federal Aviation Administration
Alaskan Region, Airports Division
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Acronyms

AASP	Alaska Aviation System Plan
ARC	Airport Reference Code
CBS	City and Borough of Sitka
CFR	Code of Federal Regulation
EA	Environmental Assessment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FHWA	Federal Highway Administration
MOA	Memorandum of Agreeement
NHL	National Historic Landmark
NOB	Naval Operating Base
NPS	National Park Service
NRHP	National Register of Historic Places
Secretary	Secretary of Transportation
SHPO	State Historic Preservation Officer
U.S.C.	United States Code
USCG	United States Coast Guard

1.0 Introduction

1.1. Section 4(f) Background

Section 4(f) of the Department of Transportation Act of 1996 (as amended), 49 United States Code (U.S.C.) §303(c), states:

The Secretary (Secretary of Transportation) may approve a transportation program or project (other than any project for a park road or parkway under Section 204 of Title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if—

(1) there is no prudent and feasible alternative to using that land; and

(2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

The Federal Aviation Administration (FAA) uses Federal Highway Administration (FHWA) regulations (23 Code of Federal Regulations [CFR] 774) as guidance in implementing Section 4(f) impact analysis and documentation. The term "feasible and prudent avoidance alternative" from the quotation above is defined by FHWA at 23 CFR 774.17:

(1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.

(2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

(3) An alternative is not prudent if:

i. It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;

ii. It results in unacceptable safety or operational problems;

iii. After reasonable mitigation, it still causes:

A. Severe social, economic, or environmental impacts;

B. Severe disruption to established communities;

C. Severe disproportionate impacts to minority or low-income populations; or

D. Severe impacts to environmental resources protected under other Federal statutes;

iv. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;

v. It causes other unique problems or unusual factors; or

vi. It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

1.2. Proposed Action

The City and Borough of Sitka (CBS), in cooperation with the Federal Aviation Administration (FAA), is proposing a new seaplane base on Japonski Island in Sitka, Alaska. Seaplanes provide essential transportation services for Sitka residents and regional communities in Southeast Alaska where communities are scattered among a number of islands with no road access or land airports. The new seaplane base is needed because the existing seaplane base is deteriorating and in poor condition. The existing seaplane base has been operating at its current location on the west shore of Baranof Island for 65 years and is at the end of its useful life and the site location has no potential for expansion.

The new seaplane base would be located near 1190 Seward Avenue on the northwest side of Japonski Island, approximately 1.4 miles west of downtown Sitka and approximately 600 miles from Anchorage at 57.055418 North Latitude; -135.363889 West Longitude (Sec. 34 and 35, T55S, R63E, Copper River Meridian, United States Geological Survey Quadrangle Sitka A5).

CBS worked with aviation stakeholders to identify the facilities needed to support safe and efficient seaplane operations. Facility needs identified were:

- A seaplane float for based seaplanes;
- A transient seaplane dock for loading unloading, and mooring without removing the aircraft from the water;
- A haul-out ramp to allow based seaplanes to be removed from the water for long-term parking, storage, washing, and maintenance;
- On-site aircraft maintenance facilities;
- Gangways with handrails for safe passenger and freight loading;
- A covered passenger waiting area with restrooms,
- A fuel storage and delivery system,
- A landside vehicle parking area, and
- Potential for lease lots for support services (such as repairs and maintenance).

2.0 Purpose and Need

The purpose of the proposed Project (Project) is to construct a new seaplane base in Sitka to address capacity, safety, and operational and condition deficiencies at the existing Sitka Seaplane Base (A29) and to provide needed air transportation facilities for Sitka residents and surrounding communities. The condition of the A29 facilities have deteriorated and the site has insufficient capacity and the inability to expand due to site constraints. The timber floats are weathered, have lost their preservative treatment, and are losing their floatation capability. In January 2016, A29 was temporarily closed because one pile supporting the transient float collapsed, damaging the transient float. A dive inspection showed significant pile section loss for another three piles. CBS made emergency temporary repairs to allow A29 to reopen in Fall 2016. Repairs included sleeving piles with larger diameter piles, structural float repairs, and additional floatation for the floats.

These repairs have a limited useful life, and complete reconstruction would be required to maintain this seaplane base for long-term use. In addition to needing substantial repairs, A29 has insufficient capacity and the inability to expand due to the constraints of the current location, congested sea-lane, and conflicts with boat traffic and birds. A new seaplane base is needed to address the unsafe and hazardous conditions at the existing facility.

> "Capacity concerns are evidenced by A29's recent full occupancy, a waiting list of seaplane owners who had been waiting two years or more to rent a slip, and interviews of seaplane pilots and businesses wanting to use a public seaplane base in Sitka. Safety concerns include concentrations of seabirds in and around A29's operating area, conflicts with boat traffic, lack of adequate taxi lane clearance between the seaplane base floats and neighboring Sitka Sound Seafoods facility, and submerged rock obstructions adjacent to the floats. Operational concerns include the lack of fueling facilities that requires seaplane operators to carry and dispense fuel from small containers, and inadequate vehicle parking. A29 is also unable to adequately serve commercial traffic because it lacks enough vehicle parking, on-site aircraft maintenance, a drive-down ramp to the floats, a passenger shelter, and equipment storage." (2016 Siting Analysis, DOWL 2016)

CBS worked with aviation stakeholders during the seaplane studies to identify the facilities needed to support safe and efficient seaplane operations and to provide a financially self-supporting transportation facility (Figures 1 and 2). Facility needs identified were:

- A seaplane float for based seaplanes;
- A transient seaplane dock for loading, unloading, and mooring without removing the aircraft from the water;
- A haul-out ramp to allow based seaplanes to be removed from the water for long-term parking, storage, washing, and maintenance;
- On-site aircraft maintenance facilities;
- Gangways with handrails for safe passenger and freight loading;
- A covered passenger waiting area with restrooms,
- a fuel storage and delivery system,
- a landside vehicle parking area, and
- potential for lease lots for support services (such as repairs and maintenance).

3.0 Section 4(F) Property

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

The 1986 nomination had 78 contributing features, and although there have been safety and efficiency improvements and changes in use, these retain the character of their period of significance. The NPS has established a boundary for the portion of the NHL adjacent to the Project site that encompasses a number of facilities (both contributing and not contributing to the NHL) that were used on Japonski Island during WWII (Figure 3). The current NHL boundary ends at the south end of the proposed project site.

The Section 4(f) property that would be affected by the project is an intact observation post located on the project site (AHRS SIT-01115). DOWL documented the facility during a site visit in May 2020 (Appendix C) and recommended the structure as eligible to the National Register of Historic Places (NRHP).

This observation post was constructed by Marine or Army infantry as part of series of small coastal fortifications that used to ring Japonski, Alice and Charcoal Islands. These small defensive positions would have been second priority defensive positions, which, depending on whether actively engaged with the enemy, ranged from foxholes and trenches to more elaborate concrete buildings such as this (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).

DOWL prepared a draft Determination of Eligibility (DOE) and recommended the observation post (AHRS SIT-01115) located on the project site as eligible for the NRHP as a contributing feature of the Sitka NOB and U.S. Army Coastal Defenses NHL under Criterion A for its association with coastal defense of Alaska during WWII. Furthermore, the DOE recommended that the observation post (AHRS SIT-01115) retains integrity of location, materials, design,

feeling, and association. Despite showing wear from decades of disuse, it still neatly conveys its original purpose as one of a series of observation posts that once dotted the coastline of the Sitka NOB and U.S. Army Coastal Defenses NHL. Although the ruins of several concrete structures are extant in the Sitka NOB and U.S. Army Coastal Defenses NHL, this building is one of two intact observation posts of this type on Japonski, Alice, and Charcoal islands (M. Hunter personal communication to C. Kennedy [DOWL], August 7, 2020). The State Historic Preservation Office (SHPO) concurred that the observation post was eligibility in March 2021.

4.0 Impacts to the Section 4(F) Property

The proposed Sitka Seaplane Base project would require the demolition of the observation post (AHRS SIT-01115) for construction of the transportation facility; therefore, Section 4(f) is triggered.

Pursuant to 36 CFR 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act (NHPA), FAA has found, and the SHPO and NPS have concurred, that the Proposed Action would adversely affect the observation post. Therefore, Section 4(f) applies to this federal undertaking.

5.0 Feasible and Prudent Alternatives

The Proposed Action Alternative is the only alternative to be fully assessed in this Section 4(f) Evaluation. As demonstrated in Section 5.1, no other feasible and prudent alternatives are available for this project.

5.1. Alternatives Considered and Dismissed

Feasible and prudent alternatives to avoid the Section 4(f) property must meet the proposed project's purpose and need. The term "prudent" refers to rationale judgment. Under FAA Order 5050.4B, paragraph 1007.e(5)(a), a project can be eliminated if it might be feasible or technically possible, but not rational when one considers its safety, policy, environmental, social, or economic consequences. Factors used to evaluate if an alternative is prudent are shown in Table 1 as defined in 23 CFR 774.17.

Table 1: Alternative Evaluation Factors

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

5.1.1. Alternative Locations

CBS completed three siting studies over the last 20 years to determine the appropriate site for the new seaplane base. Each siting study identified the proposed project site as the site that best meets project safety and operational requirements. Table 2 lists the 12 alternative sites that were evaluated in 2002, 2012, and 2016 (HDR 2002; DOWL HKM 2012; DOWL 2016; Figure 4). None of these alternative sites meet the feasible and prudent standard, as documented below.

Table 2: Alternative Sites Evaluated and Dismissed

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Starrigavan Bay	• No protection from open ocean swells • Large wind chop from southeast, north and west • Water typically choppy and rough • Huge wakes from large boats and ferry • No room for upland development • High level of salmon and waterfowl use • Too far from town for seaplane pilots and community	A – Safety concerns, lack of upland facilities, and distance from community activity area compromise project's ability to meet purpose and need. B – Unacceptable safety concerns related to exposure to open water with wind from several areas, choppy and rough water, and large wakes from large boats and ferries; unacceptable operational concerns due to distance from community and lack of potential for upland facilities. C – Environmental concerns regarding salmon and waterfowl use. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, C, and G cumulatively result in problems of extraordinary magnitude.
Existing A29 Site	• Rocks and boulders under the water • Wildlife hazard from adjacent fish processing plant • Significant fishing and boat traffic conflicts • Inadequate size for safe maneuvering room • Cannot meet existing and forecast demand • No upland area for support facility development • Narrow wingtip clearances between seaplanes	A – Safety concerns, inadequate space for aircraft parking and maneuvering, and lack of room for upland facilities compromise project's ability to meet purpose and need. B – Unacceptable safety concerns related to bird hazards, other water user conflicts, tight maneuvering area. Operations are limited at low tide. H – There is virtually no potential for upland facilities. I – The combination of factors A, B, and H cumulatively result in problems of extraordinary magnitude.
Thomsen/Eliason Harbor	• Constrained by large boat harbor and shallow water • Insufficient space at low tide for safe seaplane passage without significant dredging • Salmon run in vicinity • Cost-prohibitive dredging and development needs • High-value wetlands in intertidal area • Freezing concern due to freshwater concentration from anadromous stream • High level of boat traffic • Possible strong local opposition to upland development for seaplane facilities	A – Safety concerns and lack of space for upland facilities would compromise purpose and need. B – Unacceptable safety concerns related to high boat use, shallow waters, and icing. C – Social, economic, and environmental concerns. Conflicts with fishing and other boating uses that are important to Sitka's social and economic identify. Environmental concerns regarding salmon and waterfowl use. H – Uplands completely developed; little opportunity for upland support facilities. I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.

Table 2: Alternative Sites Evaluated and Dismissed

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Mount Edgecumbe	• More aircraft noise in residential and institutional areas • More exposure of dock to wind and wave action • Concern over north and west winds • Insufficient uplands for future seaplane base development	A – Lack of potential for upland facilities compromises purpose and need. B – Safety issues related to exposure to wind and waves. C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL. H – Uplands completely developed; little opportunity for upland support facilities. I – The combination of factors A, B, C, and H cumulatively result in problems of extraordinary magnitude.
SEARHC Cove	• Closer to residential and instituational area • More exposure of dock to wind and wave action • More potential to affect eelgrass habitat	B – Safety issues related to exposure to wind and waves. C – Social and environmental concerns related to effects on residential, high school, and institutional area and the NHL. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.
Japonski Lagoon	• Incompatible with Sitka Airport Master Plan • Maintains wildlife hazard posed by lagoon • Wind exposure • Sea lane only partially protected from sea swells and larger waves • Expense of blasting sea lane channel • No breakwater protection for sea lane east side	B –Safety problems related to exposure to wind and waves in proposed operations area; retains wildlife hazard proposed to be mitigated through Sitka Airport Master Plan. C – Social, economic, and environmental concerns due to incompatibility with Sitka airport; impacts on Sitka airport has potential for substantial economic and social effects. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.
Charcoal Island	• Significant wave, sea swell, and wind energy • Long taxi into Sitka Channel • Large wind chop from prevailing winds • Expense of constructing breakwater protection	A – Distance from activities focus in Sitka Channel and safety concerns regarding wind and wave exposure and conflicts with Sitka airport operations compromises project's ability to meet purpose and need. B – Safety concerns with operations area from open water wind and wave exposure, and conflicts with Sitka Airport operations. I – The combination of factors A and B cumulatively result in problems of extraordinary magnitude.

Table 2: Alternative Sites Evaluated and Dismissed

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Sawmill Cove	• Long fetch of Silver Bay with direct access to open ocean via Eastern Channel • Large wind chop from prevailing winds • Strong and turbulent winds from Blue Lake • Topography limits during cloudy or foggy conditions • Too far from town for seaplane pilots and community	A – Safety concerns and distance from community compromise project's ability to meet purpose and need. B – Unacceptable safety concerns; related to open ocean waves, strong and turbulent winds, and topography. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.
Safe Harbor	• Exposed to prevailing winds and waves • Close proximity to US Coast Guard (USCG) vessel dock and operations • Wildlife hazards from seafood processing sites	A – Safety concerns related to wind and wave exposure and lack of upland development potential compromise project's ability to meet purpose and need. B – Unacceptable safety concerns; conflicts with US Coast Guard vessel operations. C – Land use compatibility concerns due to US Coast Guard operations and noise near high school. I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.
Work Float	• Not well protected from wind • Lack of feasible relocation for work float use • Close proximity to USCG vessels/dock • Difficult to control access to storage area and dock • Heavy boat traffic at fueling facility and mouth of harbor under bridge • Insufficient area for upland development	A – Safety concerns and lack of upland development potential compromise project's ability to meet purpose and need. B – Unacceptable safety concerns; conflicts with boat fueling area and Coast Guard vessel operations. C – Land use concerns related to displacement of current work float use and noise near high school. I – The combination of factors A, B, and C cumulatively result in problems of extraordinary magnitude.
Jamestown Bay	• Turbulent wind due to surrounding topography • Large number of downwind takeoffs • Significant exposure to southwest swells • High level of small and large boat traffic • Upland area mostly residential	B – Unacceptable safety concerns related to wind and wave exposure and turbulent winds due to topography. Conflicts with small and large boat traffic. C – Land use compatibility concerns with residential area. I – The combination of factors B and C cumulatively result in problems of extraordinary magnitude.

Table 2: Alternative Sites Evaluated and Dismissed

Alternative	Rationale for Dismissing Alternative	Section 4(f) Factors (Table 1)
Herring Cove	• Long fetch of Silver Bay with direct access to open ocean via Eastern Channel • Large wind chop from prevailing winds • Strong and turbulent winds from Blue Lake • Topography creates safety hazards during cloudy or foggy conditions • Too far from town for seaplane pilots and community	A – Safety concerns and distance from community compromise project's ability to meet purpose and need. B – Unacceptable safety concerns; unacceptable operational concerns due to distance from community and lack of potential for upland facilities. G – Construction, maintenance, and operational costs high due to remote location. I – The combination of factors A, B, and G cumulatively result in problems of extraordinary magnitude.

Sources: HDR 2002; DOWL HKM 2012; DOWL 2016

5.1.2. Smaller Development Plan Alternative

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

Leaving the observation post in place was determined not to be possible, given the need to level the site's steep topography and lower the overall site elevation to minimize impacts to the adjacent Sitka NOB and U.S. Army Coastal Defenses NHL and to provide an efficient area for support facilities, such as a floatplane ramp, and potential future support facilities. Lowering the site and expanding it out into the tidelands also reduces the length of the marine trestle, reducing environmental effects from additional pile placement in the marine environment and lowering the development cost for the upland and marine facilities. Adequate room for support facilities are required to meet the transportation needs with a self-supporting facility.

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

- Factor A – The smaller upland operation area, lack of a seaplane ramp, and higher construction cost for the marine facilities due to the length of the trestle would compromise project's ability to meet purpose and need.
- Factor B – This alternative results in unacceptable operational problems. The steep topography of the site limits the potential for a seaplane ramp and seaplane parking and maneuvering area as well as room for future lease lots to contribute funds to support the facility.
- Factors C – This alternative would not allow the site to be lowered to minimize the potential for visual or noise impacts on the adjacent NHL and the security needs for the US Coast Guard.
- Factor F – This alternative limits the potential for mitigation of effects on the adjacent NHL protected under the NHPA and Section 4(f). Leveling and lowering the site provides a buffer between the site and the NHL and minimizes any visual and noise effects on the NHL.
- Factor I - The combination of factors A, B, C, and F cumulatively result in problems of extraordinary magnitude.

6.0 Least Overall Harm

Per 23 CFR 774.3, if there are no feasible and prudent alternatives that avoid the Section 4(f) property, then the Administration may approve, from among the remaining alternatives that use the Section 4(f) property, only the alternative that causes the least overall harm to the Section 4(f) property. The factors to be considered for an analysis of harm relative to a Section 4(f) property are defined in 23 CFR 774.3 (c)(1).

Given that the Proposed Action is the only alternative that is feasible and prudent to construct, a least overall harm analysis was not conducted for this Section 4(f) Evaluation.

7.0 All Possible Planning

Per 23 CFR 774.3, Section 4(f) requires all possible planning to minimize harm and requires documentation of measures take to minimize harm and concurrence of the officials having jurisdiction over the Section 4(f) property regarding these measures. The measures taken to minimize harm and mitigate impacts include:

- Changing the project design to lower the site elevation, reorienting the seaplane floats, and incorporating landscaping at the Seward Avenue boundary of the site to minimize the potential for visual and/or noise effects on the portion of the NHL adjacent to the Project site.
- Development of a Memorandum of Agreement (MOA) in consultation with the officials with jurisdiction over the Section 4(f) property (SHPO, NPS) and the Sitka Historical Preservation Commission to identify appropriate measures and responsible parties to mitigate the adverse effects.

8.0 Conclusion and Findings

The FAA and CBS have considered all feasible and prudent alternatives meeting the project's purpose and need that avoid using the Section 4(f) property.

Section 4(f) states that the Secretary may approve a transportation program or project requiring the use of publicly-owned land of a park, recreational area, or wildlife and waterfowl refuge of national, state, or local significance or land of a historic site of national, state, or local significance as determined by the official having jurisdiction over those resources only if:

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

The FAA and CBS have determined that:

(1) There are no feasible or prudent alternatives that avoid using or adversely affecting the Section 4(f) property. With the exception of the Proposed Action, all alternatives were determined to be infeasible and not to be prudent due to a number of factors, including failure to meet the project purpose and need; safety and operational problems; severe social, economic, or environmental impacts; severe disruption to established communities; severe impacts to environmental resources protected under other federal statutes; and additional construction, maintenance, or operational costs of an extraordinary magnitude.

(2) A number of measures were incorporated into the Project to reduce the potential for adverse effects on the adjacent NHL and contributing elements to it by a) lowering the site elevation; b) reorienting the seaplane floats to the north; and c) incorporating landscape buffering at the Seward Avenue site boundary.

(3) The Sitka Seaplane Base Project has included all possible planning to minimize harm resulting from the physical use and adverse effect to the Section 4(f) property. The proposed project avoids effects to the adjacent NHL and would include a Memorandum of Agreement with the NPS, SHPO, and Sitka Historic Preservation Commission to resolve the adverse effect to the observation post through the implementation of mitigation measures.

9.0 Record of Coordination

Table 3 lists coordination efforts conducted in support of this Section 4(f) Evaluation. Appendix B contains copies of correspondence.

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

Date	Activity	Description
November 20-26, 2019	Initiation of Consultation	FAA sent an initiation of consultation letter to SHPO, NPS, Sitka Historic Preservation Commission, Sealaska, Central Council of Tlingit & Haida Indian Tribes of Alaska, Hoonah Indian Association, Hydaburg Cooperative Association, Organized Village of Kake, Sitka Tribe of Alaska, Yakutat Tlingit Tribe
October 15, 2020	Consultation Meeting	Meeting between FAA, CBS, SHPO, and NPS to discuss the potential for effects on the NHL and the site visit to evaluate the observation post.
December 17, 2020	Submittal of DOE/Findings	Draft DOE and draft finding of adverse effects submitted to SHPO and NPS.
January 11, 2021	Consultation Meeting	Meeting between FAA, CBS, SHPO, and NPS to discuss determination of eligibility for observation post, potential finding of adverse effects, and appropriate measures to minimize harm and mitigate adverse effect.
January 29, 2021	Submittal of Revised DOE/Findings	Revised DOE and finding of adverse effects submitted to SHPO and NPS.
February 10, 2021	Sitka Historic Preservation Commission Meeting	Project information was presented to the Sitka Historic Preservation Commission and the project team received comments on adverse effects and potential mitigation measures.
February 17, 2021	Public Meeting on Draft EA	Information on cultural resource impacts were discussed as part of the public meeting on the Draft EA.
February 25, 2021	Sitka Tribe of Alaska – Resources Committee	The FAA and CBS presented information on the environmental effects documented in the Draft EA.
March 19, 2021	Sitka Tribe of Alaska, Consultation Meeting	Consultation with Sitka Tribe of Alaska on Sitka Seaplane Base project with FAA, CBS, and Southeast Area Regional Health Consortium
April 16, 2021	Consultation Meeting	Meeting between FAA, CBS, SHPO, NPS, and STA to discuss adverse effects and potential mitigation.

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Figures

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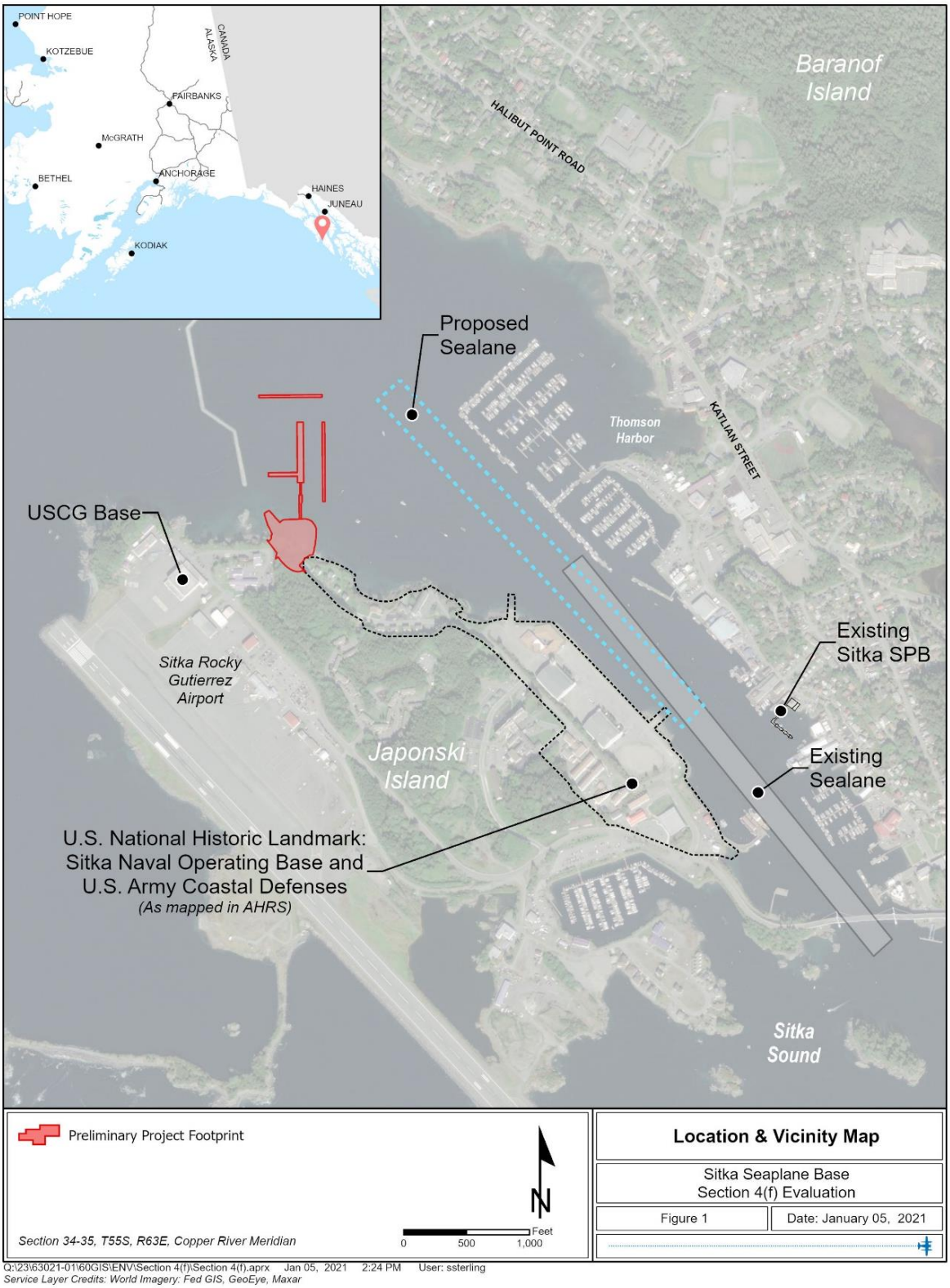

Figure 1: Vicinity Map

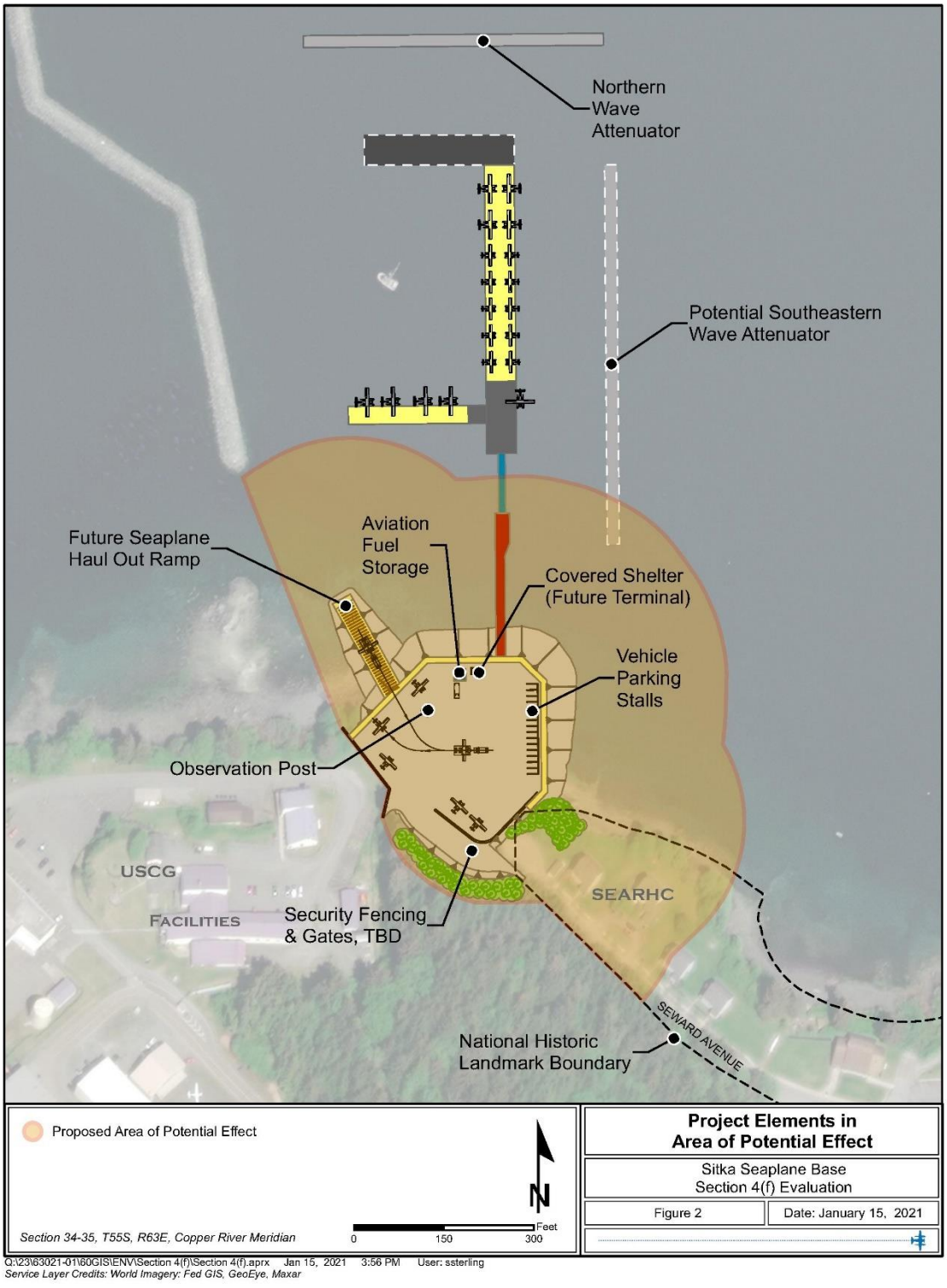

Figure 2: Sitka Seaplane Base Area of Potential Effect

Figure 3: NHL Boundary Adjacent to Proposed Seaplane Base Site

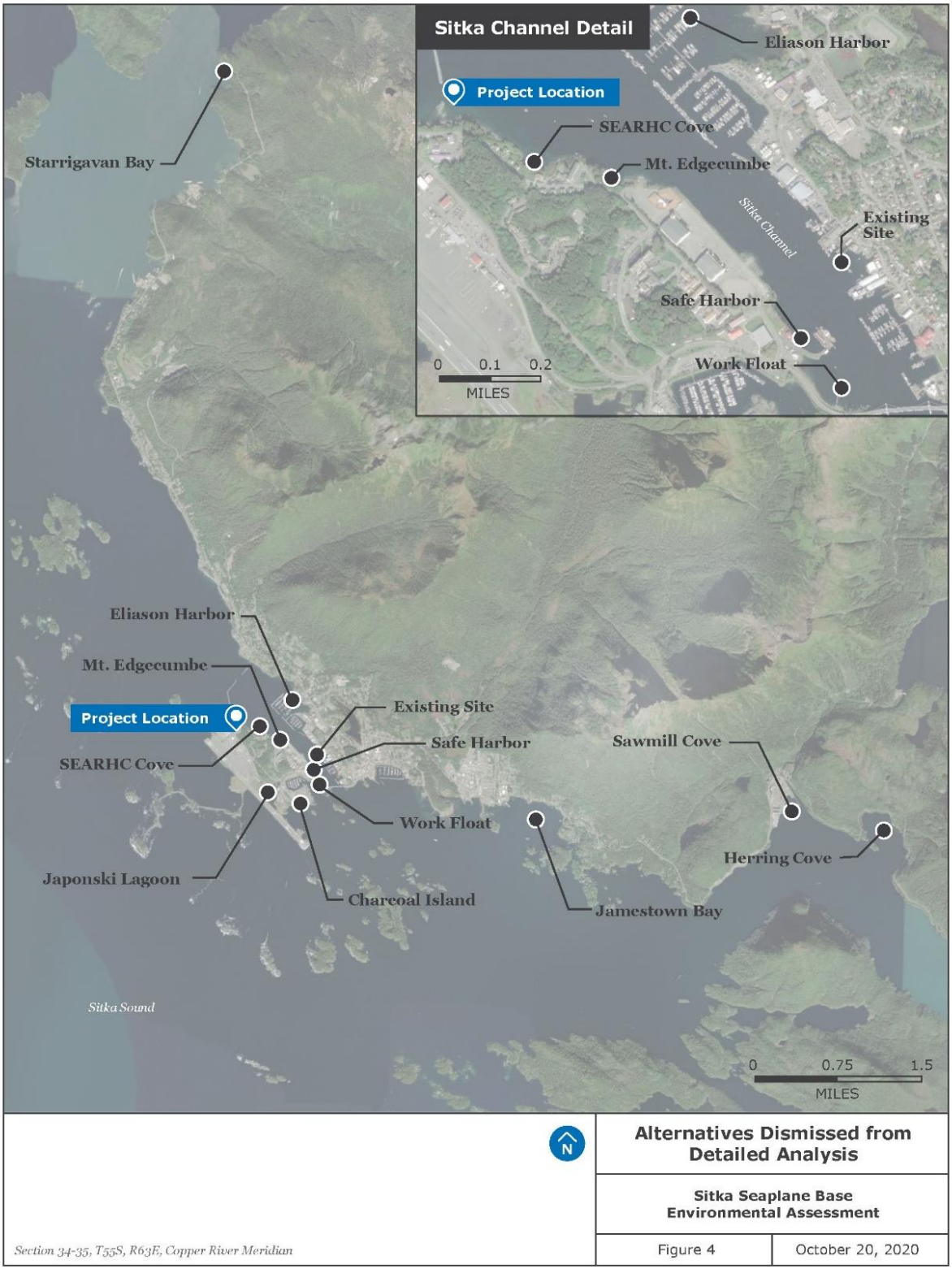

Figure 4: Alternatives Not Found Feasible and Prudent

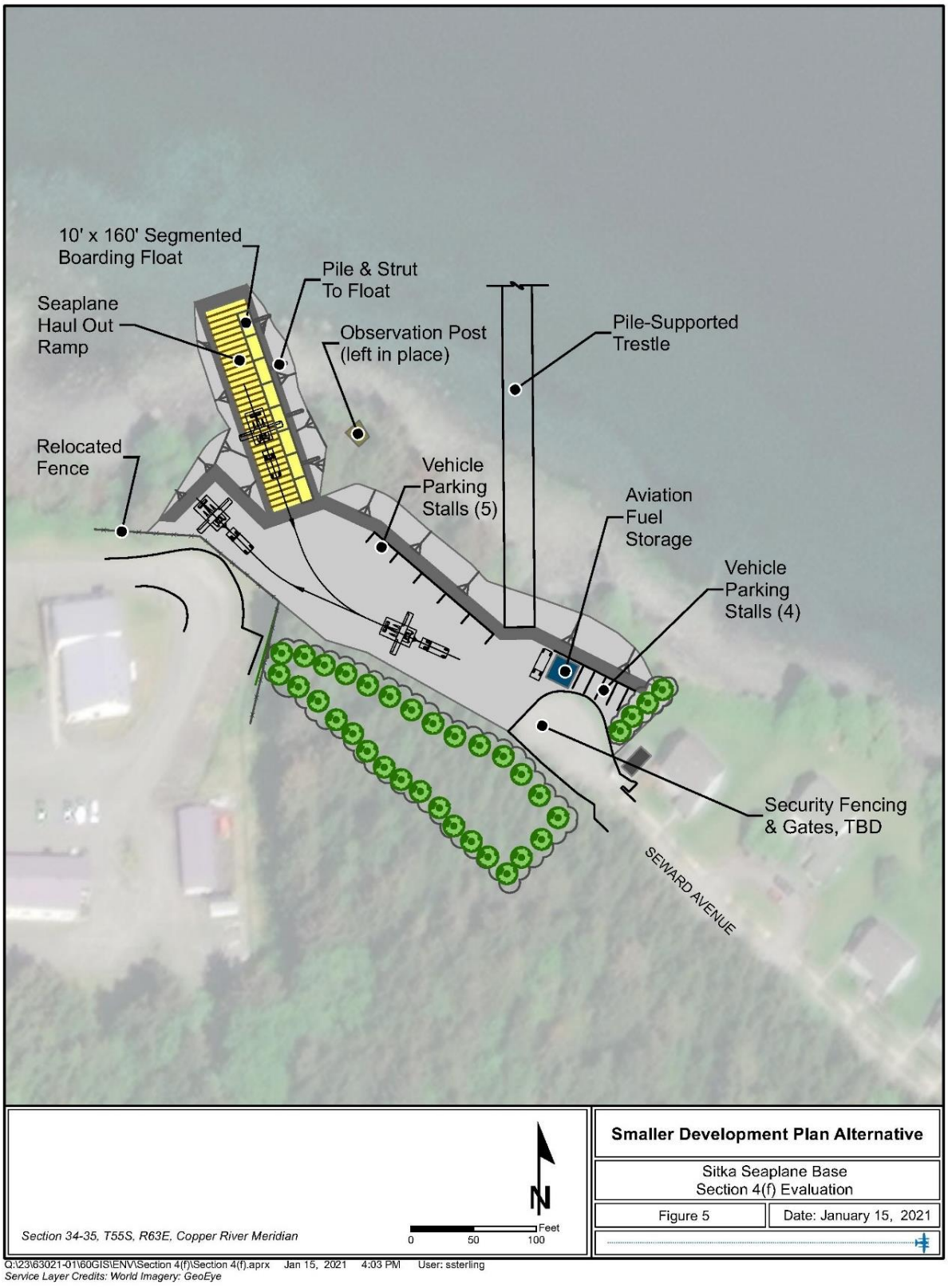

Figure 5: Smaller Development Plan Alternative

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Appendix 1:

Memorandum of Agreement (TBD)

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MOA TO BE DEVELOPED THROUGH CONSULTATION.

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Appendix 2:

Consulting Parties Correspondence

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