

APPENDIX K

Section 4(f) Statement

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U.S. Department
of Transportation

**Federal Aviation
Administration**

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February 21, 2011

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**Environmental Assessment and Section 4(f) Evaluation Review
Gustavus Airport Runway Safety Area Expansion Project**

In accordance with section 5 of the Department of Transportation Section 4(f) Regulations (23 CFR Part 774, March 12, 2008) "Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites" the Federal Aviation Administration (FAA) is submitting for your review and comment the Section 4(f) Statement for the proposed Gustavus Airport Runway Safety Area (RSA) project in Gustavus Alaska. Enclosed are 16 copies (one print and 15 CDs) of the Section 4(f) Statement and one copy (CD) of the Draft Environmental Assessment.

The Alaska Department of Transportation & Public Facilities (DOT&PF), in cooperation with the FAA, proposes to complete the following:

1. Expand the RSA for runway 11/29 to meet FAA standards and ensure to the maximum extent practicable a safe operating runway, and
2. Realign roads, drainage ditches and reroute an adjacent stream to accommodate the expanded RSA.

The Gustavus Airport is located approximately 40 miles east of Juneau on a peninsula off the Southeast Alaska mainland in Gustavus, Alaska. The purpose of the Gustavus Airport Runway Safety Area (RSA) Improvement project is to enhance safety at Gustavus Airport by bringing the

airport up to FAA standards to the maximum extent practicable. The proposed project would have an adverse effect on the Gustavus Airfield District; a historic property eligible for the National Register of Historic Places

A draft Memorandum of Agreement (MOA) to resolve adverse effects to the Gustavus Historic District was sent to the National Park Service (NPS), Glacier Bay National Park and Preserve in Gustavus. The NPS replied on January 4, 2011 and concurred with FAA's determination of adverse effect and the need to develop a MOA. They also offered the following comment:

“The National Park Service is supportive of your proposal for additional research to help us better understand the influences and impacts that this important historical event had on our landscape, the local community, and ultimately, on the development of Glacier Bay National Park.”

Consultation with the NPS, SHPO, the City of Gustavus, and Federally Recognized Indian Tribes concerning effects to the Gustavus Historic Airfield District are summarized in the FAA letter to Alaska State Historic Preservation Officer (SHPO) dated November 8, 2010. Consultation efforts culminated in an MOA signed on February 11, 2011 (Appendix B to the Section 4(f) evaluation).

Copies of correspondence between the FAA and the NPS are in Appendix A of the enclosed Section 4(f) statement. We would appreciate your comments within 45 days of receipt of this document. In consideration of the comments from the local officials with jurisdiction over the affected section 4(f) properties and the NPS, the FAA would appreciate your expeditious review of the attached Section 4(f) evaluation. If you have any questions or require additional information, please contact me at 907-271-5454 or Jane Gendron, DOT&PF Regional Environmental Coordinator at 907-465-4499.

Sincerely,

Patricia Sullivan
Environmental Program Manager

Enclosures:

- DOT&PF Section 4(f) Statement
- Draft Environmental Assessment
- Letter from Patricia Sullivan, FAA, to Judith Bittner (SHPO) dated November 8, 2010

Cc: Jane Gendron, Regional Environmental Coordinator, DOT&PF
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STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

SECTION 4(f) STATEMENT

GUSTAVUS AIRPORT
RUNWAY SAFETY AREA IMPROVEMENTS PROJECT
DOT&PF/FAA Project Nos. 68287/3130-1R

PREPARED BY
STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

Prepared for
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APPENDICES

Appendix A..... Consulting Parties Correspondence
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LIST OF ACRONYMS

AC	Advisory Circular
A CHP	Advisory Council on Historic Preservation
AOA	Airport Operations Area
ARC	Airport Reference Code
CAA	Civilian Aeronautics Administration
CFR	Code of Federal Regulations
CRC	Cultural Resource Consultants LLC
DOT&PF	State of Alaska Department of Transportation and Public Facilities
EMAS	Engineered Material Arresting System
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
GST	Gustavus Airport
MOA	Memorandum of Agreement
NPS	National Park Service
NRHP	National Register of Historic Places
OHA	Alaska Office of History and Archaeology
RSA	Runway Safety Area
SHPO	State Historic Preservation Officer
U.S.C.	United States Code
USACE	United States Army Corps of Engineers
WHMP	Wildlife Hazard Management Plan
WWII	World War II

1.0 SECTION 4(f) BACKGROUND AND PROPOSED ACTION

1.1 Section 4(f) Background

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

The 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.

FAA uses Federal Highway Administration (FHWA) regulations (Code of Federal Regulations 23 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 Gustavus Airport (GST) is located approximately 40 miles east of Juneau, Alaska, on a peninsula off the Southeast Alaska mainland in Gustavus, Alaska (Figure 1). The Alaska Department of Transportation and Public Facilities (DOT&PF) proposes to upgrade the Gustavus Airport runway safety area (RSA) to meet the Federal Aviation Administration (FAA) standards. The Proposed Action is discussed below and shown in Figure 2.

Specifically, the Proposed Action would include:

- Lengthening and widening the RSA for Runway 11/29 by:
 - Adding 409 feet at runway end 11 and 799 feet at runway end 29, and
 - Widening the entire RSA by adding 238 feet to its width.
- Construction of facilities to accommodate the expanded RSA including:
 - Grading a road section within the extent of the proposed RSA,
 - Rerouting 1,400 linear feet of road to remain outside the proposed RSA, and
 - Re-grading the existing RSA ditches and realigning RSA ditches or rerouting other ditches as necessary.
 - Project grading would generate more material than needed for fill; excess material would be disposed of in upland areas on airport property.
 - Realigning a portion of airport fence to accommodate the RSA expansion near runway 11.
 - Rerouting approximately 543 linear feet of a collection ditch around the northern extension of the RSA on the eastern side and filling the former ditch. Because, over time, this ditch has become a catalogued anadromous fish stream¹ it would be re-routed and fish habitat would be enhanced. The replacement ditch/stream would be 418 linear feet fish habitat.

¹ The Environmental Assessment for the Gustavus Runway Safety Area Improvement Project generally calls this collector ditch an Unnamed Anadromous Stream (Stream).

- Rerouting approximately 625 linear feet of an Unnamed Ditch (Ditch) around at the southern end of the existing runway to accommodate a new 600 ft long culvert in the portion of the Ditch within the RSA expansion area.
- Installation of an Asphalt Stabilized Surface to the entire RSA.
 - Surfacing hardening options would include either:
 - A hot asphalt sand mix with the following factors:
 1. The hot asphalt sand mix would require a mobile batch plant including a mobile power plant.
 2. The hot asphalt sand mix can be installed during a wide range of environmental conditions. The RSA can be surfaced later in rainy fall weather than the other option. This option would allow project completion in one construction season.
 - An emulsified asphalt and Portland cement surface (also known as an Asphalt Emulsified Surface (AES))with the following factors:
 1. Preparation, mixing, and dispersal of the AES would be done by truck so no batch plant would be required.
 2. Initial compaction of RSA would require water withdrawal from a former material site on airport property.
 3. AES requires water evaporation to become the final hardened surface. If construction begins in the late summer season, the generally wet fall conditions would require the AES be applied in the next warmer/dryer season of late spring. This would result in a two construction season project.
 - Surfacing options would be identical in appearance and would have a sand seal on the surface. The sand seal would be installed in the spring following construction because of weather constraints.
- Removing and replacing culverts, including:
 - Removing one culvert near the end of runway end 11.
 - Installing one new culvert in the existing ditch under the RSA area off the end of runway 29.
 - Removing and replacing one culvert near the end of runway end 29.

- Installing one new culvert in a new ditch parallel to the runway near the runway end 29 supplemental wind cone.
- Adjusting and replacing existing electrical facilities.
 - Replacing electrical conduit to the wind cones, VASI, and runway lighting where the realigned RSA ditches intersect existing conduit.
 - Lowering VASI, REIL, and Distance to Go sign, and other NAVAID concrete bases to match the proposed RSA elevation.
 - Trenching to the nearest junction would be necessary to adjust the conduit leading into these NAVAIDs.
 - Adjusting electrical junction boxes to match the proposed RSA elevation.
 - Replacing failing direct buried cable between the VASI.
- Construction areas would be accessed by existing airport roads.

2.0 PURPOSE AND NEED

The purpose of the proposed Gustavus Airport Runway Safety Area Improvement project is to enhance safety at GST by bringing the airport up to FAA standards to the maximum extent practicable. The safety and operational deficiencies at GST were identified in the Southeast Region Aviation System Plan (State of Alaska 2008). The Southeast Region Aviation System Plan was developed with input from the Gustavus community, local government, airport tenants, and various resource agencies.

An RSA enhances the safety for airplanes that undershoot, overrun, or veer off the runway. It also provides greater accessibility for fire-fighting and rescue equipment during such incidents. As prescribed in FAA AC 150/5300-13, the RSA shall be:

1. Cleared and graded and have no potentially hazardous ruts, humps, depressions, or other surface variations;
2. Drained by grading or storm sewers to prevent water accumulation;
3. Capable, under dry conditions, of supporting snow removal equipment, Airport Rescue and Fire-fighting equipment, and the occasional passage of aircraft without causing structural damage to the aircraft; and
4. Free of objects, except for objects that need to be located in the RSA because of their function.

The required RSA length and width are based on the characteristics of aircraft that regularly use an airport. The current Airport Reference Code (ARC) for the Gustavus Airport's Runway 11/29 is C-III. According to FAA standards for C-III runways, an RSA should be 500 feet wide and 1,000 feet long beyond each runway end. The width of the RSA is the distance from outer edge to outer edge. The RSA length extends to each runway threshold. The current RSA is 262 feet wide and extends 591 feet past runway end 11 (north) and 201 feet past runway end 29 (south), which does not meet FAA standards for safety.

The DOT&PF, in cooperation with the FAA, proposes to complete the following:

1. Expand the RSA for runway 11/29 to meet FAA standards to the maximum extent practicable to provide a safe runway and operating environment, and
2. Realign drainage ditches and reroute an adjacent stream to accommodate the expanded RSA.

3.0 SECTION 4(f) PROPERTY – GUSTAVUS AIRFIELD HISTORIC DISTRICT (JUN-01093)

The proposed project vicinity and relationship to the Section 4(f) property is illustrated in Figure 3. The Section 4(f) property that would be adversely affected by the Proposed Action is the Gustavus Airfield Historic District (District; JUN-01093). The District was recommended as eligible under Criterion A by Cultural Resource Consultants LLC (CRC) with a period of significance from 1941 to 1958. CRC's research found that the District represents the evolution in place of a "first-class" airfield and the continued use and maintenance is part of broader patterns in Alaska's history (Meitl and Yarborough, 2009).

As detailed in CRC's *Historical Review for the Gustavus Airport RSA Improvements Project* (No. 68287), *Gustavus Alaska* (December 2009), GST has been under the jurisdiction of the CAA (1945-1958), the FAA (1958-1973), and the DOT&PF (1973 to present). There is evidence that some changes have occurred including removal of communication towers and original building. However, the size, configuration, and spatial orientation of the majority of the airfield's features have remained the same.

FAA determined the District eligible for the NRHP under Criterion A for its association with the Civilian Aeronautics Administration (CAA) and World War II (WWII). Confirmation of significance will be addressed in subsequent research stipulated under the Memorandum of Agreement (MOA) executed between FAA and the Alaska State Historic Preservation Officer (SHPO) on February 11, 2011 in compliance with Section 106 of the National Historic Preservation Act (NHPA). This MOA is contained in Appendix B.

The District's contributing properties include the existing CAA Gustavus Compound Historic District (CAA Compound; JUN-01047), the Airfield Runways (JUN-01094), the Airfield Roads (JUN-01095), and the Airfield Ditches (JUN-01096). The District's contributing properties are recommended as eligible for the NRHP under Criterion A because they are contributing features of the District. The District's contributing properties are described in more detail below.

The SHPO concurred with FAA's determination that there is a Gustavus Airfield Historic District on December 13, 2010 and that the Airfield Runways (JUN-01094), the Airfield Roads (JUN-01095), and the Airfield Ditches (JUN-01096) are not individually eligible for listing in the NRHP, but that they are planned features in the development of airfields, and as such, they should be documented and listed as contributing elements.

3.1 CAA Compound (JUN-01047)

The National Park Service (NPS) previously determined the CAA Compound eligible for the NRHP under Criterion A, significant for its association with WWII and transportation, with a period of between 1941-1958. The CAA Compound contains 11 contributing properties and is located adjacent to the GST along Gustavus Road.

The FAA agrees with NPS's determination and furthermore determined that the CAA Compound also contributes to the District under Criterion A for its association with the CAA and WWII.

3.2 Airfield Runways (JUN-01094)

According to the former Glacier Bay National Park and Preserve Superintendent the runway surfaces were reconstructed in the late 1970s to improve the surface to allow Alaska Airlines to serve Gustavus during the visitor season. In 1987 the runway was rehabilitated by sealing cracks or patching and a blast pad was added to runway 11/29. In 1997, an apron was constructed southwest of the junction between the two cross runways. Asphalt was removed from a number of areas including the southern end of runway 2/20 to allow the apron construction. The base of that runway was not disturbed. The former Glacier Bay Park Superintendent stated that the runway pavement lacks sufficient integrity to convey significance as it has been substantially altered over the years.

Although not considered individually eligible, the two runways are recommended eligible for the NRHP under Criterion A as contributing elements of the District for association with the CAA and WWII. The runways provide a focus and a justification for activities that occurred in the District, while also providing form for the development of the surrounding area (Meitl and Yarborough, 2009).

3.3 Airfield Roads (JUN-01095)

Few changes have occurred to the roads within GST's boundaries. The most travelled roads have been paved but others remain gravel. Periodic maintenance to pavement and seasonal grading of gravel roads occurs.

Although not considered individually eligible, the roads within the GST property are recommended as eligible for the NRHP under Criterion A as part of the District for their association with the CAA and WWII. A portion of the Gustavus Road is within the GST property boundary; therefore, it is part of the Airfield Roads (JUN-01095) property. The FAA determined, in consultation with the DOT&PF, that the Gustavus Road (Figure 3) in its entirety (up to its junction with Wilson Road) contributes to the District. The roads and the ditches beside them formed the template for later CAA and homesteader construction and development (Meitl and Yarborough, 2009). They also greatly improved the agricultural quality of the land, and eased access, which increased homestead profitability and efficiency (Meitl and Yarborough, 2009).

3.4 Airfield Ditches (JUN-1096)

The location, design, materials, and workmanship of the airfield ditches have stayed the same, with the exception of a ditch realignment in 1996 as part of the GST apron expansion, and the section destroyed by gravel and sand harvesting. It is possible that the rest of the ditches are no longer exactly the width and depth they were immediately after their construction, mostly due to natural erosion processes, but they are still visible and functioning elements of the landscape.



The ditches' setting may have changed slightly due to development or neglect, but they are still next to roads and runways and perform their original purpose of draining the area (see Photograph 1). Their association and feeling are also intact enough to convey the sense of time. Their close proximity to the roads and runways is a WWII design feature, which does not meet current FAA standards for runway safety areas. The ditches are a reminder of a time when the land was much wetter than today and generally "fit" with the surrounding development, which has been largely planned around WWII and post-war construction. As such, the WWII and CAA historic landscape at GST has remained largely untouched by development, a rare circumstance in Alaska. Although GST was originally designated as a WWII airfield, it was seldom used as a WWII airfield.

Although not considered individually eligible, the airfield ditches are recommended as eligible for the NRHP under Criterion A as contributing features of the District for their CAA and WWII association. The ditch complex, which allowed for development of the airfield on the low glacial flat at Gustavus, is an important part of the historic landscape (Meitl and Yarborough, 2009). The size and extent of the ditches are also emblematic of the large amount of human labor that went into what is described as the monumental undertaking that resulted in the Gustavus airfield (Howell and Johnson, 2006).

4.0 IMPACTS TO THE SECTION 4(f) PROPERTY

According to 23 CFR 774.17, the implementing regulations for Section 4(f) impact analysis and documentation, “use” of a Section 4(f) property occurs:

- (1) When land is permanently incorporated into a transportation facility;
- (2) When there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose as determined by the criteria in Section 774.13(d); or
- (3) When there is a constructive use of a Section 4(f) property as determined by the criteria in Section 774.15.

The GST RSA project would not incorporate a 4(f) resource into a transportation facility because the airport is already a transportation facility. There would not be a temporary occupancy of land; the Proposed Action is a permanent action. Per 23 CFR 774.15, constructive use could occur when a project does not incorporate Section 4(f) property but the project’s proximity impacts are so severe that the protected resource would be substantially impaired. In the case of the Gustavus Airport’s project, there is an eligible property in proximity to the Proposed Action; the CAA Compound (JUN-01047). This property is also a contributing element to the eligible Gustavus Airfield Historic District. A constructive use analysis for the CAA Compound as an individually eligible property only is provided below in Section 4.1.1.1. As for the District itself, there is no constructive use because there is no proximity impact.

The Proposed Project’s affect to an existing historic transportation facility and how that affect applies to Section 4(f) is best documented in the Federal Highway Administration’s (FHWA) Section 4(f) Policy Paper (March 1, 2005), Section 4(f) Applicability, 4. Historic Bridges, Highways and Other Transportation Facilities:

Question A: How does Section 4(f) apply to historic bridges and highways?

Answer A: The Section 4(f) statute places restrictions on the use of land from historic sites for highway improvements but makes no mention of historic bridges or highways, which are already serving as transportation facilities. The Congress clearly did not intend to restrict the rehabilitation, repair or improvement of these facilities. FHWA, therefore, determined that Section 4(f) would apply only when an historic bridge, or highway is demolished, or if the historic quality for which the facility was determined to be eligible for the National Register is adversely affected by the proposed improvement. The determination of adverse effect under 36 CFR 800.5 is made by FHWA in consultation with the SHPO and/or THPO. Where FHWA determines that the facility will not be adversely affected, the SHPO/THPO must concur with the determination or FHWA must seek further input from the ACHP.

Pursuant to 36 CFR 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, FAA has found, and SHPO concurred, that the Proposed Action would adversely affect the Gustavus Airfield Historic District. Therefore, Section 4(f) does apply to this federal undertaking.

Following is a discussion of the impacts that the Proposed Action would have on the Gustavus Airfield Historic District (JUN-01093) and its contributing elements, including a potential constructive use of the CAA Compound.

4.1 Analysis of Potential Section 4(f) Impacts

4.1.1 The Gustavus Airfield District (JUN-01093) Contributing Elements

4.1.1.1 *CAA Compound (JUN-01047)*

The Proposed Action would not result in a direct impact to the CAA Compound, located approximately 1,700 feet southwest of Runway 11/29. The Proposed Action pertains to the runway and would not involve the CAA Compound. A change in ditch configuration or runway proportionality to the airfield as a whole would not be visible to the CAA Compound nor would those change result in any use of this Section 4(f) property. FAA determined and SHPO concurred that the Proposed Action would not adversely affect the CAA Compound so there is no constructive use of the CAA Compound.

4.1.1.2 *Airfield Runways (JUN-01094)*

The runways form the core and focus of the District. The runways' ability to contribute to the District relies upon their design, proportionality, location, and workmanship, as well as their close association with other surrounding and associated elements of the historic landscape. The proposed lengthening (by over 1,200 feet) and widening (by 238 feet) of the RSA for Runway 11/29 would alter the original design and workmanship, adversely affecting the still apparent, 1940s and 1950s, spatial design of the airfield.

The Proposed Action would result in a change of proportionality between the runways. When the airport was first built, the main runway was 300 wide and 7500 feet long; the cross wind runway was 300 feet wide and 5000 feet long. In terms of proportionality, the main runway's length was 25 times its width and it had the same width as the cross-wind runway.

Today, the runway is 6500 foot long with a 600 foot RSA at one end and a 200 foot runway at the other, a total of 7300 feet long. It is now 262 feet wide including the existing RSA. Its length is 27.8 times its width and it slightly less wide than the cross-wind runway (Figure 4).

Under the Proposed Action, the footprint of pavement will become 8500 feet long by 500 wide. The main runway would be 17 times longer than it is wide and be 67% wider than the cross-wind runway (Figure 5).

Therefore, the Proposed Action would impact the integrity aspects of design, workmanship, and setting of this contributing element. FAA determined and SHPO concurred that the Proposed Action would adversely affect the Airfield runways as contributing elements to the Gustavus Airfield Historic District

It should be noted that, as part of recent background research on the runway, the former Glacier Bay Park Superintendent clarified that the runway pavement lacks sufficient integrity to convey

significance as it has been substantially altered over the years. The FAA concurs that the pavement lacks sufficient integrity to convey significance.

4.1.1.3 *Airfield Roads (JUN-01095)*

The only planned change to the airport road system would occur southwest of Runway 11/29. Here, a portion of a road would be within the RSA expansion zone. However, the road would still be drivable and used by airport personnel. Also, the spatial relationship of a section of this road and its associated ditch would be changed by the proposed ditch realignment. The FAA has determined that the Proposed Action would not result in a direct use of the airport roads, one of the District's contributing elements. Therefore, the District itself would not be adversely affected by the proposed change to the roads.

4.1.1.4 *Airfield Ditches (JUN-01096)*

The grading and filling planned as part of this project would relocate drainage ditches paralleling Runway 11/29 with a similar cross section to maintain the appearance of the original design and workmanship. Under the Proposed Action, at the 29 end of the RSA, where approximately 600 feet of ditch is located within the footprint of the proposed RSA, a culvert would be placed and the ditch filled in. In addition, 625 linear feet of unnamed ditch would be rerouted into the new culvert within the RSA expansion area (Figure 2). The re-aligned ditch portion would have a similar cross-section to the original ditch in order to maintain the appearance of the original design and workmanship, but the deep ditch portion replaced with a culvert would be lost.

At the 11 end of the RSA, approximately 518 linear feet of a collector ditch would be rerouted around the expanded foot-print of the RSA. The cross-section of the relocated ditch would be similar to the existing ditch but, because this ditch provides anadromous fish habitat, some habitat enhancements would be added. The length of the rerouted ditch would be 418 linear feet. One existing culvert near the end of runway end 11 would be removed.

FAA has determined the Proposed Action would not result in an adverse effect (direct use) to the ditches. However, the various alterations to the ditch system would change the relative proportionality of the contributing elements; therefore, when combined with the other components of the Proposed Action, changes to the ditches contribute to a cumulative adverse effect on the District as a whole.

4.1.2 The Gustavus Airfield District (JUN-01093)

FAA has determined that the Proposed Action would:

- Not adversely affect the CAA Compound
- Not adversely affect the Airfield roads
- Not adversely affect the Airfield ditches but cumulative changes would adversely affect airfield proportionality
- Adversely affect the Airfield runway because of a change in airfield proportionality.

FAA has determined that there is a Gustavus Airfield Historic District eligible for the National Register under Criterion A for a local significant association with WWI and CAA. According to CRC, the setting of the District may have changed slightly due to development or, in some cases, neglect, but overall, the WWII and CAA historic landscape at GST has remained largely untouched by development, a rare circumstance in Alaska.

Therefore, the Proposed Action would have an adverse effect on the attributes that make the Gustavus Airfield Historic District eligible for listing on the National Register. A Section 4(f) evaluation is required to provide sufficient supporting documentation to demonstrate why there is no feasible and prudent avoidance alternative and also demonstrate that all possible planning to minimize harm to the Historic District has occurred.

5.0 FEASIBLE AND PRUDENT ALTERNATIVES

The Engineered Material Arresting System (EMAS) and Lateral RSA Widening (described in more detail in Section 5.2) and the Proposed Action Alternative are the only two alternatives to be fully evaluated in this 4(f) Statement. 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 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: Alternatives Evaluation Factors

Factors used to evaluate if alternatives are prudent:

- 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?
 - Does the alternative cause unacceptable safety or operational problems?
 - Does the alternative cause severe social, economic, or environmental impacts after reasonable mitigation?
 - Does the alternative cause severe disruption to established communities after reasonable mitigation?
 - Does the alternative cause severe disproportionate impacts to minority or low income populations after reasonable mitigation?
 - Does the alternative cause severe impacts to environmental resources protected under other federal statutes after reasonable mitigation?
 - Does the alternative result in additional construction, maintenance, or operational costs of an extraordinary magnitude?
 - Does the alternative cause other unique problems or unusual factors?
 - Does the alternative involve multiple factors listed above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude?
-

The following alternatives were considered during the preliminary design, but they were determined not to be prudent alternatives and were dismissed from further consideration for the reasons summarized below:

1. No-Action Alternative - The No-Action Alternative is not prudent when evaluated by the criteria listed in Table 1. The No-Action Alternative would not meet the purpose and

need to improve the existing GST RSA to meet FAA's existing RSA standards and improve the safety of the runway and operational environment; thus, this alternative was dismissed from further consideration in the Section 4(f) analysis (Table 1, bullet 1).

2. EMAS - This alternative would construct a 600-foot long RSA containing a 345-foot by 150-foot bed of EMAS on each end of Runway 11/29. The lateral RSA width would remain as is, without improving the safety of the runway; thus, this alternative does not meet the project purpose and need (Table 1, bullet 1) and was dismissed from further consideration.
3. Geocell Reinforced Soil RSA - This alternative would construct the full RSA dimensions in AC 150/5300-13 by reinforcing the existing sand with a cellular confinement system (geocell). The sand in the geocells would be seeded to prevent erosion from removing sand and endangering the ability of the geocell to support an errant aircraft. Maintenance would be the same as the No Action because the vegetation growing in the RSA would need to be mowed regularly. This alternative was eliminated as it is not prudent because it would result in unacceptable safety problems due to the potential increase in wildlife aviation hazards that are posed by wildlife habitat adjacent to an active runway. According to the current Gustavus Wildlife Hazard Management Plan (WHMP), avian fauna such as Canada Geese, ducks, ravens, crows, jays, Bald Eagles, and magpies frequent the Gustavus area. The WHMP includes a vegetation management plan whose purpose is to reduce the amount of natural cover available to hazardous wildlife species at the GST. Current FAA regulations require DOT&PF personnel to actively deter hazardous wildlife from the Airport Operations Area (AOA). This alternative would maintain hazardous wildlife use at the airport, potentially causing unacceptable operational safety conditions. Thus, this alternative was dismissed as not prudent (Table 1, bullet 2).
4. RSA to Full Standards with Aggregate (Gravel) - This alternative would construct the full RSA dimensions in AC 150/1500-13. Sand would be removed and a 14-inch-thick layer of aggregate base course would be placed within the RSA dimensions to support an errant aircraft. This alternative is feasible; however, it was determined not prudent because it would result in unacceptable problems in two ways: (1) It is not a safe practice to construct gravel surfaces on airports that serve jet aircraft. Gravel is a hazard to jet aircraft because it can be ingested into jet engines on take-off; and (2) The gravel RSA would attract avian fauna such as Canada Geese, ducks, ravens, crows, jays, Bald Eagles, and magpies frequent the Gustavus area. It would also eventually support the growth of grass on the side slopes, which would further exacerbate the existing GST issues with wildlife hazards and potential bird strikes, as outlined in the GST WHMP. For the reasons listed above, this alternative was dismissed as it would not improve safety of the runway or operational environment (Table 1, bullet 2) and is not a prudent avoidance alternative.

Table 2: Summary of Alternatives Considered and Dismissed from further Section 4(f) analysis

Alternatives Considered and Dismissed	Not Prudent or Does Not Meet Purpose and Need
No Action Alternative	X
EMAS	X
Geocell Reinforced Soil RSA	X
RSA to Full Standards with Aggregate	X

5.2 Alternatives Considered for Further Evaluation

5.2.1 Proposed Action

The Proposed Action would meet the project purpose and need by rectifying deficiencies with, and complying with the FAA Airport Reference Code (ARC) specification for RSA requirements. The Proposed Action is feasible, and it is also a prudent alternative when evaluated by the criteria listed in Table 1.

Because FAA standards were developed to improve operational safety in the event of an aircraft excursion from a runway, constructing the improvements described in the Proposed Action would reduce the potential for damage to an aircraft that veers off the runway and provide access for aircraft rescue and firefight equipment response.

- The Proposed Action would not cause unacceptable safety or operational problems, or cause severe social, economic, or environmental impacts, or cause disruption to established communities, or cause additional construction, maintenance, or operational costs of an extraordinary magnitude.
- The Proposed Action would not result in an accumulation of factors that collectively would have an adverse impact that directly would impact the safety of current and future users of the airport facility.

5.2.2 Engineered Material Arresting System (EMAS) and Lateral RSA Widening

The EMAS and Lateral RSA Widening Alternative would construct a 600-foot long RSA containing a 345-foot by 150-foot bed of EMAS on each end of Runway 11/2. The RSA would be widened 120 feet on each side to a full 500 feet.

This alternative would meet the project purpose and need by rectifying deficiencies and comply with the FAA ARC specification for RSA requirements. The alternative is feasible and prudent when evaluated by the criteria listed in Table 1.

- Similar to the Proposed Action, EMAS and Lateral RSA Widening Alternative would not cause unacceptable safety or operational problems, or cause severe social economic or environmental impacts, or cause disruption to established communities or cause additional construction, maintenance, or operational costs of an extraordinary magnitude.

- The EMAS and Lateral RSA Widening Alternative would not result in an accumulation of factors that collectively would have an adverse impact that would directly impact the safety of current and future users of the airport facility².

5.3 The Proposed Action and EMAS and Lateral RSA Widening as Feasible and Prudent

A summary of the Section 4(f) prudent and feasible alternatives considered are shown in Table 3. FAA has determined that there are no prudent and feasible alternatives that avoid use of the 4(f) property. Both EMAS and Lateral RSA Widening and the Proposed Action use the 4(f) property to a slight extent. The extent to which each of these alternatives use the 4(f) property will be comparatively analyzed and discussed further in Section 5.4, Comparative Analysis of Feasible and Prudent Alternatives.

Table 3: Prudent and Feasible Alternatives

Alternative	Section 4(f) Property Impacts (Direct Use)	Meets FAA ARC Standards	Meets Purpose and Need	Prudent	Feasible
Proposed Action	Yes	Yes	Yes	Yes	Yes
EMAS and Lateral RSA Widening	Yes	Yes	Yes	Yes	Yes

5.4 Comparative 4(f) Analysis of Feasible and Prudent Alternatives

Both the EMAS and Lateral RSA Widening Alternative and the Proposed Action adversely affect the District and one of its contributing elements. The impacts these alternatives have to the 4(f) resource must be comparatively analyzed to determine if one of these the two alternatives better minimize adverse impacts or has lesser harm to the Section 4(f) property.

5.4.1 The Gustavus Airfield District’s (JUN-01093) Contributing Properties

This section describes the difference in relative harm to the District’s contributing properties between the EMAS and Lateral RSA Widening Alternative and the Proposed Action.

5.4.1.1 *CAA Compound (JUN-01047)*

Neither the EMAS and Lateral RSA Widening Alternative nor the Proposed Action would have direct or constructive use of or would harm (adversely affect) the CAA Compound.

² Note that the EMAS with Lateral Widening Alternative was dismissed in the Environmental Assessment due to additional costs of at least \$7.5 million. These additional costs are not of an extraordinarily magnitude, therefore, EMAS is being evaluated as a potential avoidance or least harmful alternative.

5.4.1.2 *Airfield Runways (JUN-01094)*

The FAA has determined that the Airfield Runways (JUN-01095), as contributing to a 4(f) property, would be harmed by altering the integrity aspects of the runways design, workmanship and setting (the proportionality of the runways). The original 11/29 runway was 7,500 feet long and 300 feet wide; its length was 25 times its width. The existing runway 11/29 is 6,500 feet long and 262 feet wide; its length is 27.8 times its width. The main runway's width compared to the cross runway has not changed much; they were of equal width originally, the main runway is not slightly narrower. The proportionality of the runways is one of the character defining features and so a change constitutes a harm to that feature. The EMAS and Lateral RSA Widening Alternative and the Proposed Action differ in the degree of change to this proportionality or harm of this 4(f) property.

Under the Proposed Action, the footprint of pavement will become 8,500 feet long by 500 wide. The main runway would be 17 times longer than it is wide and be 67 percent wider than the cross-wind runway (Figure 5).

Under the EMAS and RSA Widening, the footprint of pavement would become 7,700 feet long by 500 wide. The main runway would be 15.4 longer than it is wide and be 67 percent wider than the cross-wind runway. The characteristics of EMAS would also result in light-colored rectangles within the RSA at the ends of the runway.

Figures 4, 5, and 6 demonstrate the differences in the proportionality and visual characteristics of the No Action (as a reference), the Proposed Action, and the EMAS and Lateral RES Widening alternatives.

Adverse effects to the Airfield runways are similar between these two alternatives, however the EMAS and Lateral RSA Widening alternative does have a greater effect proportionality compared to the Proposed Action (EMAS length to width ratio is 15.4 compared to the original runway's ratio of 27; Proposed Action length to width ratio is 17). It also introduces a new type of design and workmanship clearly different from the original runway. EMAS could result in different visual characteristics.

5.4.1.3 *Airfield Roads (JUN-01095)*

FAA has determined that there is no adverse effect on the Airfield Roads (JUN-01095) or to the District as a whole from the minor changes to the roads under the Proposed Action and under the EMAS and the RSA Lateral Widening Alternative.

5.4.1.4 *Airfield Ditches (JUN-01096)*

While the FAA has determined that there would be no adverse effect on the Airfield Ditches (JUN-01096) under the Proposed Action, the various alterations to the ditch systems would change the relative proportionality of the contributing elements and would therefore constitute an adverse effect on the District (JUN-01093) as a whole. The EMAS and Lateral RSA Widening Alternative and the Proposed Action somewhat differ in respect to their alterations to the ditch systems, in particular an alteration to the collector ditch located at the northeast corner of the RSA expansion at runway end 11. A portion of this ditch falls within the footprint of the

Proposed Action but not within the footprint of the EMAS and Lateral RSA Widening Alternative. Under the Proposed Action, 543 feet of this ditch would have to be relocated. Because this ditch is now an anadromous stream it will be reconstructed as a 418 feet of new fish habitat. Under the EMAS and Lateral RSA Widening Alternative, this relocation would not occur.

Table 4: Summary of Comparative 4(f) Analysis of Adverse Effects from the Feasible and Prudent Alternatives

Section 4(f) Resources	EMAS & Lateral RSA Widening	Proposed Action
CAA Compound (JUN-01047) (Individually Eligible)	No Adverse Effect	No Adverse Effect
Gustavus Airfield Historic District (JUN-01093) (Individually Eligible)	Adverse Effect	Adverse Effect
District Contributing 4(f) Properties:		
Airfield Runways (JUN-01095)	Adverse Effect (greater proportionality change)	Adverse Effect
Airfield Ditches (JUN-01096)	No Adverse Effect	No Adverse Effect (greater reconfiguration)
Airfield Roads (JUN-01095)	No Adverse Effect	No Adverse Effect
CAA Compound (JUN-01047)	No Adverse Effect	No Adverse Effect

Overall, there is not a substantive difference between the effects of the Proposed Action and effects of the EMAS and Lateral RSA Widening Alternative on the Section 4(f) resources. The Proposed Action would have a marginally greater impact to the ditches and the EMAS and Lateral Widening would have a greater impact to the runways, a more important character defining feature of the 4(f) resource.

6.0 MEASURES TO MINIMIZE HARM

Section 4(f), codified in 49 U.S.C. § 303(c), specifies that if there is no feasible and prudent avoidance alternative, the action must include all possible planning to minimize harm to the 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. As part of the planning process, an analysis of harm relative to the District has been applied, and is summarized in Table 5 below.

6.1 Minimization Measures through Design

Minimization measures to lessen the visual effect of the RSA surfacing materials were considered during design (i.e., use of a light gray chip seal). The visual deviation from the existing runway material would vary depending on the type of aggregate used but would likely be a shade of gray.

Measures to minimize impacts to the airfield ditches include replacing the majority of the ditches “in-kind” with a similar cross section to keep a similar visual appearance to reflect the original design and workmanship. The ditch at the end of runway 29 would be replaced by a culvert and resurfaced over the top as part of the new RSA. This would eliminate the need to construct an additional culvert around the end of runway 29.

6.2 Minimization Measures through the MOA

To resolve the adverse effects to the District, a MOA was developed in consultation with the SHPO and NPS. The MOA outlines measures and responsible parties to mitigate the adverse effect. FAA, SHPO, and DOT&PF approved and signed the MOA on February 11, 2011.

As part of the stipulations in the MOA, the FAA, in coordination with DOT&PF, shall ensure that the following stipulations are implemented:

Historic Context and Evaluation

1. The DOT&PF shall develop a report containing a more thorough historic context and evaluation of the Gustavus Airfield Historic District. The report will document additional research conducted to establish a comprehensive basis to understand the significance of the District, its contributing features, and the influence of this historic event on the eventual development of Gustavus and Glacier Bay National Park. It will include:
 - a. Historic Overview. Additional information on the period of significance, particularly the extent of World War II and CAA construction and use of the airport, and the effects of airport construction on the eventual development of Gustavus and Glacier Bay National Park. This will also discuss and provide the basis for a potential Gustavus Airfield cultural landscape and associated features in the broader Gustavus area.
 - b. A more thorough identification and description of character-defining features of the District, a listing of original features that have been destroyed or altered, and an evaluation of integrity of the contributing elements.

- c. A graphic depiction showing the proposed boundary of the historic district and contributing elements.
- d. The DOT&PF, with oversight from FAA, will develop the Historic Context and Evaluation in consultation with SHPO.
 - o The DOT&PF shall submit a Historic Context and Evaluation outline to SHPO and NPS for review.
 - o The SHPO shall provide DOT&PF with review comments no later than thirty (30) days after receipt of the documentation.
 - o The DOT&PF shall take into account comments received during the review period.
- e. The DOT&PF, with oversight from FAA, shall ensure that the draft report is submitted to SHPO and NPS for comment and verification of completion within two (2) years after signing this Agreement.
 - o The SHPO shall provide DOT&PF with review comments no later than thirty (30) days after receipt of the documentation.
 - o The DOT&PF shall take into account comments received during the review period.
 - o The final report shall be submitted to SHPO and NPS within two (2) months of the receipt of the draft comments.
- f. The report shall meet contemporary professional standards and follow the Alaska Office of History and Archaeology (OHA) Standards and Guidelines for Investigating and Reporting Archaeological and Historical Properties in Alaska (Historic Preservation “Series #11) and the Secretary of the Interior’s Standards and Guidelines for reports (48 FR 44734-44737).

6.3 Conclusion

Per 774.3 (c)(1), if there are no feasible and prudent avoidance alternative, then the Administration may approve only the alternative that causes the least overall harm. The least overall harm is determined by balancing the factors listed in Table 5. As shown in Table 5, the two alternatives being compared have similar adverse effects to Section 4 (f) properties. The EMAS and Lateral Widening RSA would avoid relocating one of the contributing ditches. It would have a greater impact to the character defining features of the runway and, therefore, the Gustavus Airfield Historic District (JUN-01093). It would also result in a missed opportunity to improve anadromous fish habitat. The fishery resource agencies are in support of the relocated ditch. There is an estimated 40 percent higher cost for the EMAS/Lateral RSA alternative compared to the Proposed Action.

The Proposed Action has less change in the proportionality and the design, materials, and workmanship would be more similar to the existing RSA compared to the EMAS and Lateral Widening Alternative. Fish habitat would be enhanced in the collector ditch that is now an anadromous fish stream.

Table 5: Summary of the Least Overall Harm Analysis

Factor*	Analysis/ Comparison	
	Proposed Action	EMAS and Lateral RSA Widening
The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property).	As part of the stipulations in the MOA between FAA and SHPO entered into as mitigation for an adverse effect to a Section 106 resource, FAA and DOT&PF, would develop a more thorough historic context and evaluation of the District (Appendix B). FAA coordinated with the NPS in developing the MOA. The NPS asked that this mitigation establish a comprehensive basis to better understand the significance of the District and its contributing features, to assess and identify what physical components should be present to demonstrate integrity, and the influence of the District on the development of Gustavus and the Glacier Bay National Park .	Because this Alternative would still result in an adverse effect to the District, the same MOA measures would be implemented to mitigate for the adverse effect to the 4(f) property.
The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection.	While the Proposed Action would have an adverse effect due to alteration of the proportionality of the airfield, one of the character defining features but the affect is not considered to be a significant impact on the overall features that qualify the District for the NRHP.	The EMAS/Lateral RSA Alternative would have substantially the same level of adverse effect as the Proposed Action.
The relative significance of each Section 4(f) property.	This alternative would affect the same Section 4(f) property as the EMAS and Lateral Widening alternative. The District is not nationally significant, but is an important WWII and CAA related resource in Gustavus, at the local level.	This alternative would affect the same Section 4(f) property as the Proposed Action. The District is not nationally significant, but is an important WWII and CAA related resource in Gustavus, at the local level.
The views of the official(s) with jurisdiction over each Section 4(f) property.	SHPO was consulted on each Section 4(f) property. SHPO concurred on December 13, 2010 that the Proposed Action would result in an adverse effect to the District (Appendix A). The National Park Service (NPS) has found that the proposed action would not affect their CAA compound (JUN-01047). SHPO and FAA have agreed that the	SHPO was not consulted on the effects of the EMAS/Lateral RSA Alternative to the eligible properties. FAA has made the finding of adverse effect, the same as the Proposed Action, and expects that the SHPO and NPS would concur with their finding. Were this alternative be implemented, the same MOA

Factor*	Analysis/ Comparison	
	Proposed Action	EMAS and Lateral RSA Widening
	stipulations in the MOA would be appropriate mitigation for the adverse effect. The NPS has also agreed with the stipulations in the MOA. DOT&PF has agreed to implement the MOA.	would apply.
The degree to which each alternative meets the purpose and need for the project.	The Proposed Action is feasible and prudent, and meets the purpose and need.	The EMAS/Lateral RSA alternative is feasible and prudent, and meets the purpose and need.
After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f).	Because the collector ditch on runway 11 end is now essential fish habitat and the Proposed Action would require its relocation. The existing habitat dries out during low water season because of the ditch configuration. The mitigation for the relocation would result in improved fish passage. This would result in an impact of approximately 0.24 acres of wetland.	The EMAS/Lateral RSA alternative would avoid the relocation of the ditch/stream. Fish passage would not be improved. Birds would still be attracted to dead fish when the ditch/stream goes dry from time to time. The 0.24 acre of wetland impact would be avoided.
Substantial differences in costs among the alternatives.	The estimated cost for the Proposed Action is \$14 million.	The cost of this alternative was developed as part of the 2005 Practicability Study. It was estimated to be \$23.5 million in 2005 dollars. The 2005 estimate is a minimum amount needed and would likely go higher.

*23 CFR 774.3(c)(1) criteria for demonstration of least overall harm.

7.0 CONCLUSION AND FINDINGS

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

Section 4(f) states that, subject to exceptions for *de minimis* impacts, the Secretary of Transportation (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 the DOT&PF have determined that:

1. There are no feasible or prudent alternatives that avoid using or adversely affecting the Section 4(f) property.
2. The only other feasible and prudent alternative, EMAS and Lateral RSA Widening, would not minimize harm to the Section 4(f) property to a greater extent than the Proposed Action. This Alternative also has a higher cost than the Proposed Action and there would be a missed opportunity to improve fish habitat.
3. The GST RSA Improvements Project has included all possible planning to minimize harm resulting from the physical use and adverse effect to the 4(f) property and has developed a mitigation plan to resolve the adverse effect to the District through the implementation of measures in an MOA.

8.0 RECORD OF COORDINATION

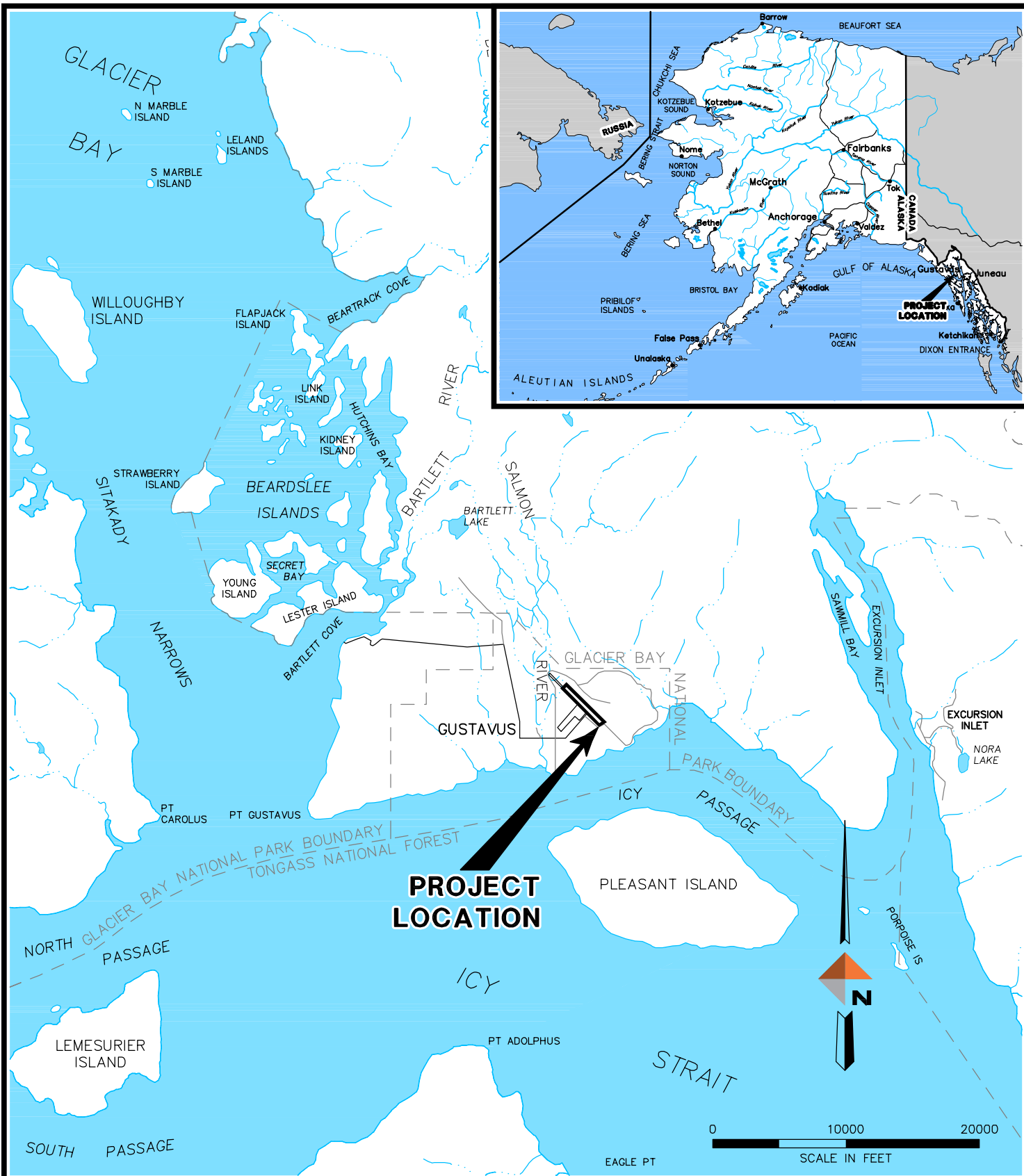
Table 6: Record of Coordination Relative to the Section 4(f) Property

Date	Activity	Description
April 14, 2010	Findings Letter	DOT&PF sent a Finding of No Adverse Effect Letter to SHPO, Central Council of Tlingit and Haida Tribes of Alaska, Hoonah Indian Association, Huna Totem Corporation, Sealaska Heritage Institute, Sealaska Corporation, NPS-Glacier National Park, and the City of Gustavus.
May 18, 2010	Findings Letter Response	SHPO responded to DOT&PF with a non-concurrence to the Finding of No Adverse Effect.
November 8, 2010	Revised Findings Letter	FAA sent a Finding of Adverse Effect Letter and invitation to participate in an MOA to SHPO, Central Council of Tlingit and Haida Tribes of Alaska, Hoonah Indian Association, Huna Totem Corporation, Sealaska Heritage Institute, Sealaska Corporation, NPS-Glacier National Park, and the City of Gustavus.
December 13, 2010	Findings Letter Response	SHPO responded to FAA with a concurrence to the Finding of Adverse Effect and agreement to participate in an MOA.
December 16, 2010	Findings Letter	FAA sent a Finding of Adverse Effect Letter and invitation to participate in an MOA to the Advisory Council on Historic Preservation (ACHP).
January 4, 2011	Findings Letter Response	NPS responded to FAA with a concurrence to the Finding of Adverse Effect and agreement to participate in an MOA.
January 12, 2011	Findings Letter Response	ACHP responded to FAA with a no interest in participation in the Section 106 process of the proposed project.
January 18, 2011	MOA Comments	NPS in comments to the MOA requests expansion scope of additional research to include features in the Gustavus area which are located outside the District Boundary and investigation of the influence of the airport on the development of Gustavus and Glacier Bay National Park.
January 27, 2011	Phone Conference	DOT&PF contacted NPS and expressed concern over the scope and extent of NPS's comments and that the mitigation should be kept at a level that corresponds to the scope and scale of the project and level of impacts to the resource.
February 1, 2011	Email	NPS concurs with desire of DOT&PF and FAA to keep the scope of investigation consistent with scope and scale of the project.

9.0 REFERENCES

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FIGURES



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VICINITY MAP

Sec 5,6,8,9

T40S, R 59E

Copper River Meridian, Alaska



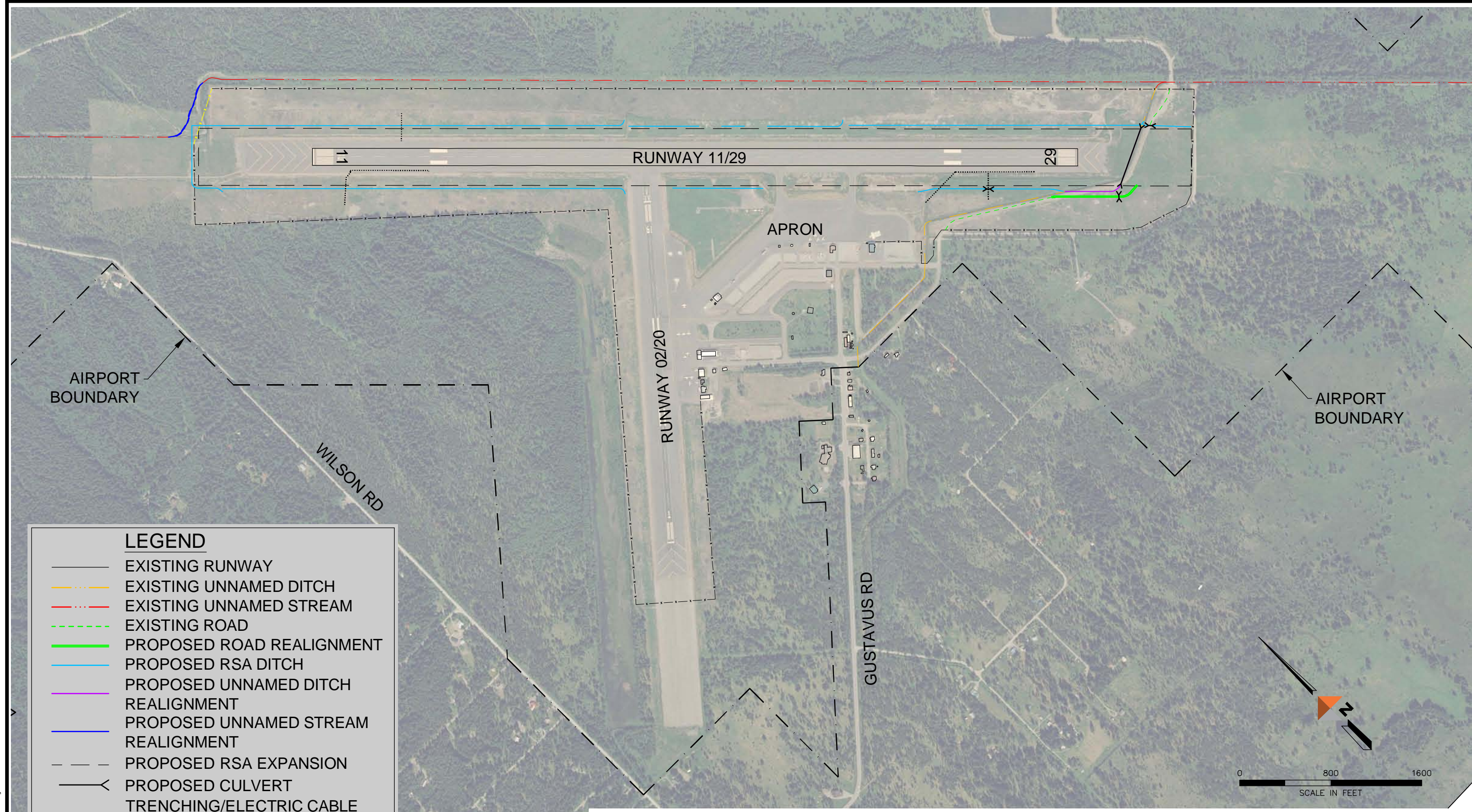
STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

PROJECT No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: FEBRUARY 2011

FIGURE 1



LEGEND

- EXISTING RUNWAY
- EXISTING UNNAMED DITCH
- EXISTING UNNAMED STREAM
- EXISTING ROAD
- PROPOSED ROAD REALIGNMENT
- PROPOSED RSA DITCH
- PROPOSED UNNAMED DITCH REALIGNMENT
- PROPOSED UNNAMED STREAM REALIGNMENT
- - - PROPOSED RSA EXPANSION
- PROPOSED CULVERT
- TRENCHING/ELECTRIC CABLE REPLACEMENT
- x - x - x - EXISTING FENCE
- PROPOSED FENCE

NOTE: FOR CLARITY ALL CULVERTS NOT AFFECTED BY THE PROPOSED ACTION WERE OMITTED.

PROPOSED ACTION

Sec. 5,6,8,9

T40S, R59E

Copper River Meridian, Alaska

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STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

Project No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

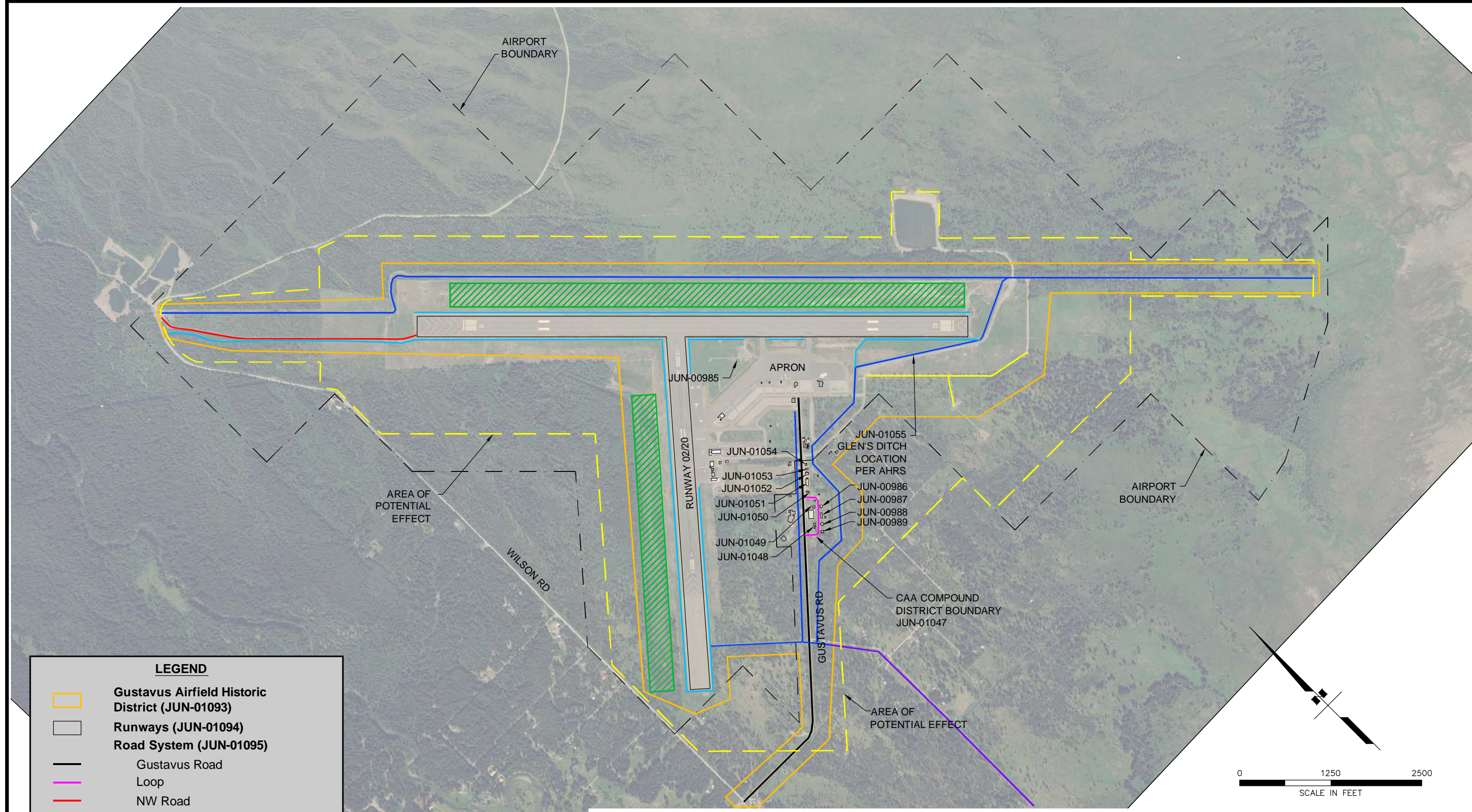
Gustavus, Alaska

DATE: FEBRUARY 2011

FIGURE 2

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LEGEND

- Gustavus Airfield Historic District (JUN-01093)
- Runways (JUN-01094)
- Road System (JUN-01095)
 - Gustavus Road
 - Loop
 - NW Road
 - SW Road
- Ditch System (JUN-01096)
 - Collector Ditch
 - Feeder Ditch
 - Glen's Ditch
 - Fill Depressions/Catchment Areas

Historic Properties

Sec. 5,6,8,9

T40S, R59E

Copper River Meridian, Alaska

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STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

Project No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: FEBRUARY 2011

FIGURE 3

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NO ACTION
 AIRFIELD RUNWAY IMPACTS
 Sec 5,6,8,9

T40S, R 59E
 Copper River Meridian, Alaska



STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES

PROJECT No 68287
 GUSTAVUS AIRPORT RUNWAY
 SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: FEBRUARY 2011 | FIGURE 4

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PROPOSED ACTION
AIRFIELD RUNWAY IMPACTS

Sec 5,6,8,9

T40S, R 59E

Copper River Meridian, Alaska



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

PROJECT No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: FEBRUARY 2011

FIGURE 5

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EMAS AND LATERAL WIDENING
AIRFIELD RUNWAY IMPACTS

Sec 5,6,8,9

T40S, R 59E

Copper River Meridian, Alaska



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

PROJECT No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: FEBRUARY 2011

FIGURE 6

APPENDIX A

Consulting Parties Correspondence

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STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

SOUTHEAST REGION DESIGN & ENGINEERING SERVICES
PRECONSTRUCTION - PRELIMINARY DESIGN & ENVIRONMENTAL

SEAN PARNELL, GOVERNOR

6860 GLACIER HIGHWAY
PO Box 112506
JUNEAU, AK 99811-2506

PHONE: (907) 465-1851
FAX: (907) 465-3506

In Reply Refer To:
State Project #68287

April 14, 2010

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Certified Mail: 7004 2510 0004 0092 6437

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to expand the Gustavus Airport Runway Safety Area (RSA) to meet current standards. The proposed project is located in Sections 5, 6, 8 and 9 of T40S, R59E, Copper River Meridian (enclosure 1, figures 1 and 2). Pursuant to 36 CFR 800.5(b), implementing regulations of Section 106 of the National Historic Preservation Act, DOT&PF on behalf of FAA finds no adverse effect on historic properties by the proposed project.

Proposed Project Description

The Gustavus Airport Runway Safety Area Improvement project would expand the Runway Safety Area (RSA) to resolve operational deficiencies identified in the Southeast Region Aviation System Plan (DOT&PF 2008) and to meet FAA standards.

A RSA enhances safety for airplanes that undershoot, overrun, or veer off the runway. It also provides greater accessibility for fire-fighting and rescue equipment during emergency incidents.

Currently, Runway 11/29 is 6,721 feet long and 150 feet wide with a surrounding RSA measuring 7,513 feet by 262 feet.

This project would increase the RSA by approximately 55 percent. Project details are shown in enclosure 1, figure 2.

Page | 1

"Providing for the safe movement of people and goods and the delivery of state services."

The proposed RSA improvements are:

- Grading existing ground to lengthen and widen the RSA for runway 11/29 to meet FAA standards by adding 409 feet at runway end 11 and 799 feet at runway end 29, and
 - Widening the entire RSA by adding 238 feet to its width.
- Rerouting approximately 800 linear feet of an unnamed anadromous stream around the RSA's northern extension on the eastern side and fill the former stream channel.
- Applying Asphalt Emulsified Surface (AES) to harden the entire RSA surface.
 - The current RSA is vegetated with mowed grassy surface. The surface would now be black turning to grey over time. The texture of the surface would resemble the asphaltic pavement surface of runway 11/29.
- Removing, replacing, and installing culverts and fencing.

Area of Potential Effect (APE)

The proposed project APE was determined in consultation with your office, based on the nature of the undertaking, and identification of known historic properties (enclosure 1, figure 3). The APE incorporates several nearby features historically associated with the construction or use of the airport. The farthest extent of the APE was determined to be no more than 500 feet beyond known associated historic properties.

The APE includes

- Historic properties of the proposed project could directly or indirectly affect including neighboring parcels or outlying properties,
- Straight parts of the road leading from either end of the 11/29 runway
- Staging areas and disposal sites.

Identification Effort

DOT&PF searched the Alaska Heritage Resources Survey (AHRS) and literature to determine historic properties that may be directly or indirectly affected. The AHRS search shows the:

- Civilian Aeronautics Administration (CAA) Compound Historic District (JNU-1047).

- Properties (JUN-0985, 986, 0987, 0989, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055) associated with the 1940-1960 CAA Compound.

Cultural Resource Consultants (CRC) completed a survey to identify historic properties in the proposed project area in 2009 (*Historical Review for the Gustavus Airport RSA Improvements*). See enclosure 2. CRC’s report evaluates historic properties that may be associated with World War II (WWII) and the CAA within a period of significance from 1941 to 1958. CRC recommends two properties; Airfield Roads and Airfield Ditches are individually eligible for inclusion on the National Register of Historic Places (NRHP) under Criterion C. CRC’s opinion is that the Airfield Runways lack integrity to be individually eligible. CRC recommends the CAA Compound Historic District be expanded to a *Gustavus Airfield Historic District* with the Airfield Runways, Roads and Ditches as contributing elements. No known Archaeological sites are within the APE.

DOT& PF reviewed CRC’s recommendation and disagrees that

- the CAA Compound Historic District should be expanded, and
- the Airfield Roads and Airfield Ditches are individually eligible.

Capital improvements and routine maintenance over time have changed the runways so they lack sufficient integrity to be eligible for inclusion to the NRHP. DOT&PF does agree with CRC’s opinion that the Airfield Runways are not eligible for the NRHP. See enclosure 3 for DOT&PF’s rationale.

Determination of Eligibility

The CRC report proposes four properties eligible for the NRHP. They are:

Gustavus Airfield Historic District CRC recommends the airfield runways, road system, and ditches are eligible under Criterion A as contributing features of an expanded district that includes the CAA Historic Compound. From the CRC report –

This new district, with a period of significance from 1941 to 1958, incorporates the linear features associated with the airfield—the runways, un-paved roads, a paved road, and ditches—and the earlier established CAA Historic District. The name change reflects the broad area of significance that this property represents. The expanded period of significance includes the years from 1941 to 1951 originally suggested by the Park Service for the CAA Historic District and the later dates—1948 to 1958—recommended by the SHPO. Expanding the concept of the district in both space and time from a post-1948 “compound” and including the runways, ditches, and roads—all of which available evidence indicates were under construction by 1941—follows both the Park Service’s assessment of the property and SHPO’s concerns and recommendations.

DOT& PF disagrees. CRC’s opinion relies on WWII design, location and workmanship of the runways, roads and ditches. The airfield and associated roads and ditches in Gustavus have always been a civilian operation with a weak link to WWII. The Gustavus airfield was an auxiliary gravel strip to Elmendorf during WWII with no evidence that military personnel were

stationed in Gustavus to operate and maintain the airfield. Rationale for DOT&PF's finding is in enclosure 3, DOT&PF position paper by Michael Kell.

Further, the airfield lacks integrity to convey significance associated with the CAA. According to the National Park Service NRHP nomination form (enclosure 4):

The runways, and for that matter, the entire immediate airfield grounds, have undergone continual maintenance and incremental transformation. Though the runways retain their original orientation, they have been resurfaced several times, most recently in 2000-2001. All of the original communication, navigational and lighting equipment has been replaced, and all of the original CAA buildings located directly on the airport have been destroyed or removed. This includes at least 17 buildings of various uses. Leases on lots for hangars and airline offices have been let by Alaska DOT, and new buildings line the east and south sides of both runways. The entire airport was fenced in 2000-2001, and new lighting has been installed in 2005-2006. In short, the entire landscape of the airport has been transformed, and with the exception of the original orientation of the runways, it little resembles the original CAA facility.

The orientation of the airfield runways remain basically unchanged but is not unique to military airfield construction in Alaska (see enclosure 3, table 1 with supplemental photo documentation).

Further, we agree with the NPS that runway improvements and routine maintenance has altered the setting, materials, design, and workmanship to the point the association with the CAA is no longer conveyed. Specifically,

- Modern airfield facilities designed for jet aircraft use have essentially altered the setting.
- Modern materials no longer resemble original pavement materials.
- Modern runway design for jet aircraft little resembles original airfield design.
- With the advent of modern, efficient, construction methods, modern improvements little resemble original workmanship. That is, original workmanship is not significantly evident.
- Runway 02/20 was shortened about 1000 feet in the late 1990's. Trees have grown into the glide slope for jet aircraft so runway 02/20 was shortened into a utility runway (personal communication, Michael Pedersen, DOT&PF Gustavus Airport Maintenance Chief).

Without association the airfield no longer conveys a historic significance of the CAA period.

Airfield Roads CRC proposes the roads within airport property are individually eligible under Criterion C as examples of WW II era engineering in Alaska. CRC's contention is that despite modifications to the roads evidence of original size and construction techniques still exist.

DOT&PF disagrees with CRC's opinion. Because of new construction, maintenance and modernization of the roads, lack of a strong association with WWII, and lack of the seven aspects of integrity the property fails to meet the Register's eligibility requirements. Over the years routine maintenance and repairs have degraded roadway form, structure, and style. Current

roadway standards (Alaska DOT&PF Standard Specifications for Highway Construction, 2004) do not resemble the construction specifications shown in the CRC report. All road improvements to Gustavus airfield roads closely resemble current specifications. Most of the roads have been paved and surfacing materials have been installed in the 1990's (personal communication Jan 2010, John Scott, DOT&PF engineer). Workmanship of the WWII and CAA eras are no longer evident. According to the National Park Service (Howell and Johnson, 2006)

In evaluating this CAA aviation landscape, as stated above, most of the features on the landscape have been destroyed, transformed, or have become obsolete, and most have lost sufficient elements of integrity that precludes them from being considered to the NRHP. Those features merit brief discussion here (in part) CAA roads, which set the template for later development, have been continuously maintained, altered and modernized and continue to serve the community, and resemble the CAA version only in layout.

CRC proposes the roads are also eligible under Criterion A as contributing features of an expanded Gustavus Airfield Historic District for their WWII and CAA association.

DOT&PF disagrees with CRC's opinion. The present day runways, along with supporting ditching and roadways, are not represented in the archaeological or the contemporary physical architectural records for a WW II association. The research and archival (see enclosure 3) work reveal no clear evidence of the construction during the WWII era of these roads. The proposal of eligibility under Criteria A of these general linear features has no corresponding support in the documentation of the current aviation landscape for the WW II period and should not be cited as contributing features for the an expanded Gustavus Historic District.

Airfield Ditches CRC proposes the ditches within airport property are individually eligible under Criterion C as examples of WW II era engineering in Alaska.

DOT&PF disagrees. CRC's recommendations rely on the WWII character of the ditches. The research and archival work in the WWII nature of the present day airfield produced no clear evidence of the construction during the WWII era (see enclosure 3). The apparent lack of WWII related documentation renders the recommendation for eligibility under Criteria C improbable in either the WWII or CAA eras.

CRC recommends the ditches are also eligible under Criterion A as contributing features of an expanded Gustavus Airfield Historic District.

DOT&PF disagrees with CRC's opinion. The proposal of eligibility under Criteria A of these general linear features has no corresponding support in the documentation of the current aviation landscape for the WW II period and should not be cited as contributing features for an expanded Gustavus Airfield Historic District.

CAA Airfield Compound The National Park Service (NPS) recommended the district and 11 structures within the district as eligible for the NRHP (enclosure 4).

DOT&PF agrees because:

- Association with the development of the CAA in Southeast Alaska.
- The 11 structures (JUN-986, 987, 988, 989, 1048, 1049, 1050, 1051, 1052, 1053, 1054) retain integrity of location and setting to convey a historic streetscape and they convey a sense of the functions they served historically.

Building 200 is identified in the AHRS(JNU-985). DOT&PF agrees with a previous recommendation (Chattey 1999) is not eligible because it lacks information to confirm integrity

Findings of Effect

Archaeological Sites

There are two ditch realignment areas which may disturb original ground but there are no known archaeological sites within the APE.

The current landscape was created by modern construction affecting all the drainage in the area, including the ditch realignment areas. Specifically, the water table was lowered by modern ditch construction. During the prehistoric period the area was wetter and use by local peoples was unlikely. Archaeological utilization of biotic resources would be negligible and doubtful.

Because of the pervasive prior disturbance there is a low probability of intact prehistoric properties that would be affected. DOT&PF finds no further archaeological work is needed.

Historic Built Properties

CRC recommends an adverse effect on the proposed Gustavus Airfield Historic District due to the “cumulative magnitude of effects of the proposed project.” CRC argues

The runways form the core and focus of the district. The runways’ ability to contribute to the district relies upon their design, location, and workmanship, as well as their close association with other surrounding and associated elements of the historic landscape. The proposed lengthening (by over 1,200 feet) and widening (by 238 feet) of the RSA for Runway 11/29 would substantially change its design and workmanship, and affect the still apparent, 1940s and 1950s, spatial arrangement of the airfield. The proposed alterations will also affect runway 11/29, resulting in a loss of proportionality between the runways themselves, now largely apparent from the air. Construction activities, including grading around the perimeter of the RSA could also damage or destroy the few remaining areas of original pavement that have no modern equivalent.

The increase in distance between the landing area and the ditches would also constitute a serious departure from World War II-era design, which called for a much shorter and

narrower safety area bounded by ditches. In a way, moving the ditches out from the runway and using emulsified asphalt to harden the new RSA surface would actually be in keeping with the original design concept of having pavement extend to the greatest possible extent. However, this too would affect the airfield's proportionally, a key design element. During WWII, the airfield had two paved, "T-oriented" runways of similar size extending nearly to the ditches that bordered them. This project would expand the paved area around 11/29 by several degrees of magnitude, while the paved area around 2/20 would remain smaller than its original construction specifications.

DOT&PF disagrees. CRC's opinions rely on the WWII character of the runways, roads and ditches comprising this expanded district. Not enough is known about WW II construction of the Gustavus airfield (see enclosure 3) to determine if there is a nexus between WWII and the historic properties in the CAA Airfield Compound Historic District.

CRC's opinion also relies on the original airstrip proportionality and "T-oriented" design. DOT&PF disagrees. Two items stand in contrast to CRC's opinion:

The linear proportionality of the runway has been dramatically altered in modern times. Runway 02/20 was shortened about 1000 feet in the late 1990's. Trees have grown into the glide slope for jet aircraft so runway 02/20 was shortened into a utility runway (personal communication, Michael Pedersen, DOT&PF Gustavus Airport Maintenance Chief).

The "T-oriented" runways are not a unique character defining feature of WWII military airstrips in Alaska (enclosure 3, table 1 photos)

Indirect impacts From the ground, the CAA Compound District and the 11 historic structures cannot be seen from the proposed project and the proposed project cannot be seen from the district or its historic buildings.

From the air, there will be no visual impacts to the CAA Gustavus Compound Historic District nor the eleven properties within the CAA Gustavus Compound Historic District.

There would be no increase in air traffic resulting from the proposed safety improvements. There would be no increase in visual or noise impacts to historic properties eligible for the NRHP.

DOT&PF determination: The proposed project has No Adverse Effect on the characteristics that qualify the properties for inclusion in the National Register of Historic Places.

The proposed project would not alter the CAA Gustavus Compound Historic District or the 11 properties within the CAA Gustavus Compound Historic District. There would be no visual or noise impacts to the CAA Gustavus Compound Historic District or properties within the CAA Gustavus Compound Historic District. None of these properties would be directly or indirectly affected by the project. Table 1 summarizes our findings and basis for each eligible property.

Consultation

We sent consultation letters to the following federally recognized tribal entities and other consulting parties:

- Central Council of Tlingit and Haida Tribes of Alaska
- Hoonah Indian Association
- Central Council of Tlingit and Haida Tribes of Alaska
- Hoonah Indian Association
- Huna Totem Corporation
- Sealaska Heritage Institute
- Sealaska Corporation
- National Park Service, Glacier National Park
- State Historic Preservation Officer
- City of Gustavus

In response to the consultation letter we only received one reply. The NPS responded that the proposed project would have no effect to historic structures JUN- 985 to 989 nor JUN 1047 to 1055.

Follow up calls were made to all parties. Sealaska Heritage requested a copy of the CRC report. There were no substantive comments. Table 2 summarizes our consultation outreach.

Please direct your concurrence or comments to me at the address above, by telephone at (907) 465-4544 or by e-mail at carl.schrader@alaska.gov. I also encourage you to contact Michael Kell, DOT&PF Cultural Resource Specialist, by telephone at (907) 465-4715 or by e-mail at michael.kell@alaska.gov so he can respond to your comments immediately.

Sincerely,



Carl Schrader
Regional Environmental Coordinator

Enclosures:

1. Figures 1 through 3, specifically:
 - a. Figure 1 – Location and Vicinity,
 - b. Figure 2 – Proposed Action
 - c. Figure 3 – Area of Potential Effect.
2. Historical Review for the Gustavus Airport RSA Improvements prepared by Sarah Meitl, MA and Michael Yarborough, MA *Cultural Resource Consultants LLC*, December 2009
3. DOT&PF position paper by Michael Kell, ADOT&PF Cultural Resource Specialist
4. Howell and Johnson, National Register of Historic Places Multiple Property Documentation Form for the CAA Gustavus Airfield Compound.

Cc w/ enclosures:

Patricia Sullivan, FAA Environmental Manager
Laurie Mulcahy, DOT&PF Cultural Resources Manager
Michael Kell, DOT&PF Southeast Region Cultural Resource Specialist

Cc w/o enclosures:

Chuck Tripp, DOT&PF Southeast Region, Project Manager
Jim Scholl, DOT&PF Southeast Region, Project Environmental Analyst

Table 1

Summary table for findings of effect for each eligible property

The basis of finding is the proposed project does not have any adverse effect on the characteristics that qualify any of these properties for inclusion in the NHRP. Further detail is provided below.

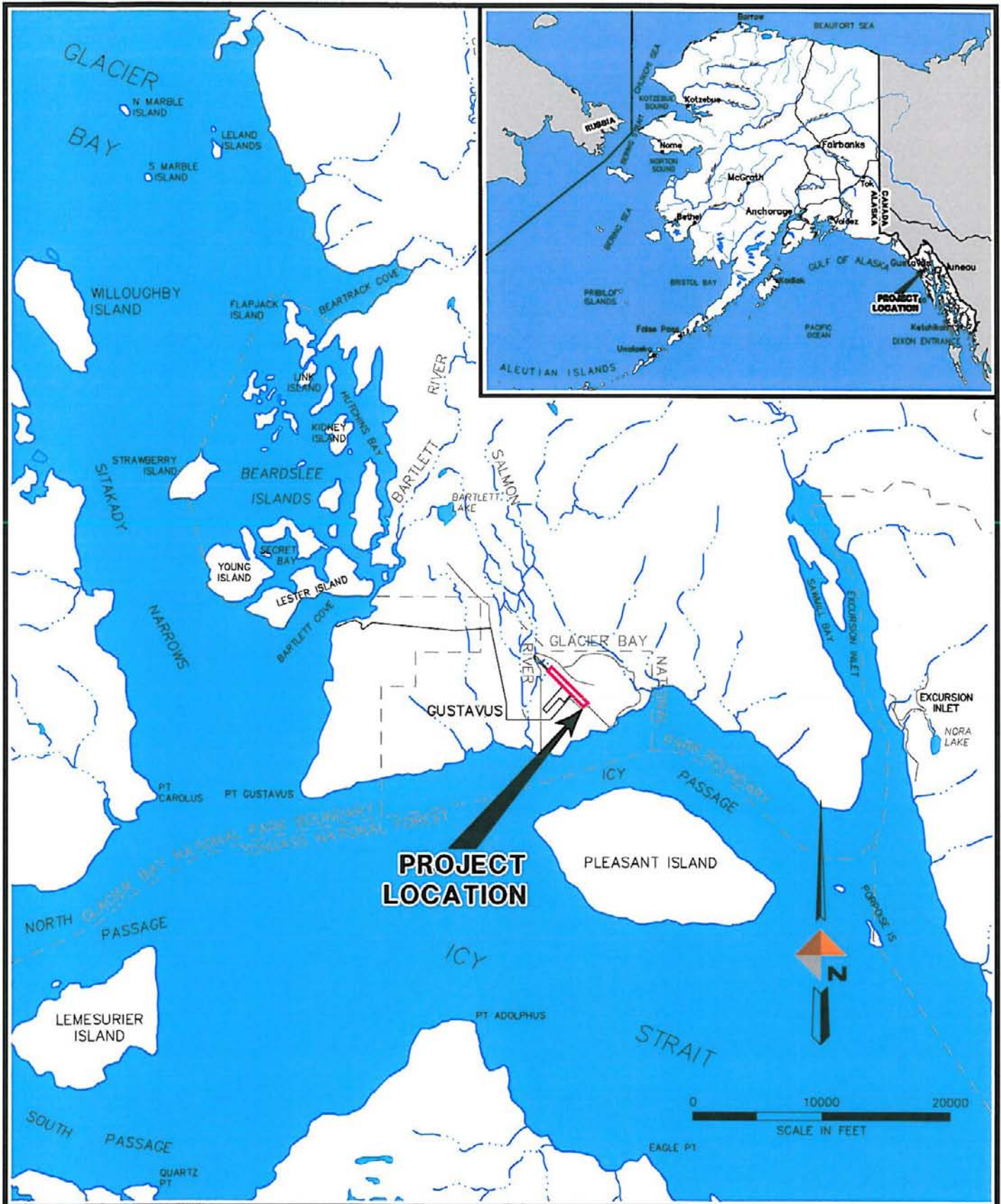
AHRS JUN -	Building Name	Date	Detail regarding effect
1047	CAA Gustavus Compound Historic District		Property not directly affected. No increase in visual or noise impacts from either the ground level or the air. So there are no direct effects or increase in indirect effects.
986	CAA Airfield Cottage 20,	1950	No direct effects or increase in indirect effects.
987	CAA Airfield Boiler Plant, 1948	1948	No direct effect or increase in indirect effects.
988	CAA Airfield Cottage 21,	1950	No direct effect or increase in indirect effects.
989	CAA Airfield Cottage 22,	1950	No direct effects or increase in indirect effects.
1048	CAA Chatham School District House 1	1948	No direct effects or increase in indirect effects.
1049	CAA-Chatham School District House 2	1948	No direct effects or increase in indirect effects.
1050	CAA-Former Gustavus Preschool	1948	No direct effects or increase in indirect effects.
1051	DOT Maintenance Shop	1948	No direct effects or increase in indirect effects.
1052	CAA-Gustavus Electric Co. Generator Building	Post- 1948	No direct effects or increase in indirect effects.
1053	CAA Community Chest (302)	1948	No direct effects or increase in indirect effects.
1054	CAA Community Chest (304)	1948	No direct effects or increase in indirect effects.

Table 2**Summary of initiation of consultation letters**

Type	Sent by / Date	To	Response / Synopsis
Gov't to Gov't Consultation	FAA / 4-27-09	Central Council of Tlingit and Haida Tribes of Alaska	Follow up call on 1/15/10 – No answer, left message
Gov't to Gov't Consultation	FAA / 4-27-09	Hoonah Indian Association	Follow up call on 1/15/10 – No answer, left message
Consultation	DOT&PF / 4-16-09	National Park Service, Glacier National Park	By Wayne Howell, NPS Archaeologist / No effects to historic structures JUN-00985 to 989 nor JUN1047 to 1055
Consultation	DOT&PF / 4-16-09	City of Gustavus	Follow up call on 1/15/10 – City clerk had received the letter and the City had no comment at this time
Consultation	DOT&PF / 4-16-09	State Historic Preservation Officer	None
Consultation	DOT&PF / 11-4-09	Central Council of Tlingit & Haida Indian Tribes of Alaska	Follow up call on 1/15/10 – No answer, left message
Consultation	DOT&PF / 11-4-09	Hoonah Indian Association	Follow up call on 1/15/10 – No answer, mailbox full, could not leave message
Consultation	DOT&PF / 11-4-09	Sealaska Heritage Institute	Follow up call on 1/15/10 – Ms. Rosita Worl (President) had no comment but requested a copy of the CRC report.
Consultation	DOT&PF / 11-4-09	Huna Totem Corporation	Follow up call on 1/15/10 – No answer, mailbox full, could not leave message
Consultation	DOT&PF / 11-4-09	Sealaska Corporation	Follow up call on 1/15/10 – Ms. Metz (CEO's Admin Asst.) had received letter. Sealaska has no comment

Enclosure 1

Figure 1	Location and Vicinity
Figure 2	Proposed Action
Figure 3	Area of Potential Effect



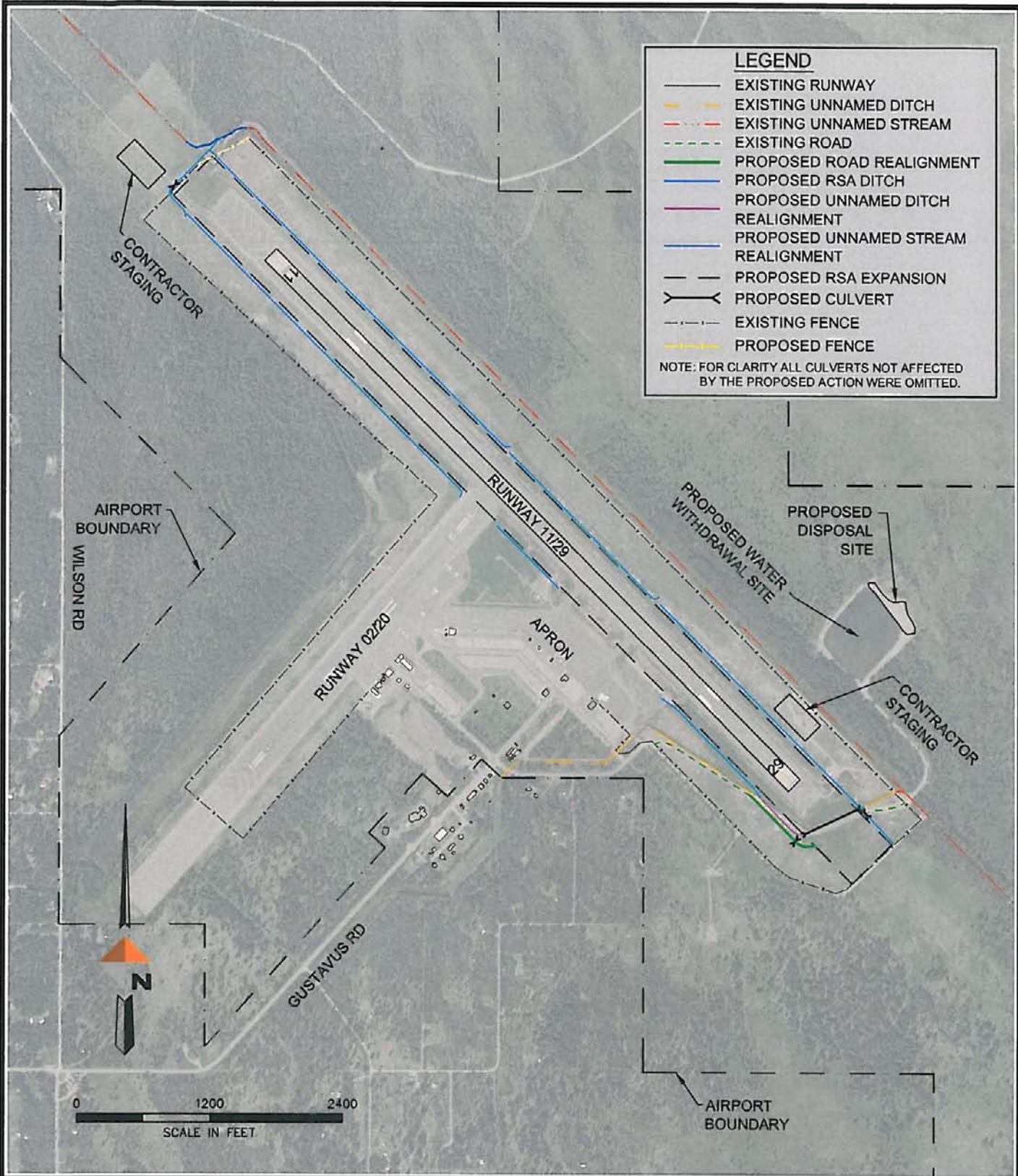
P:\Projects\1D60159\ENVIENV-GSTVS.dwg 2009-2-23

SCALE: AS SHOWN



Vicinity Map
 GUSTAVUS AIRPORT RUNWAY
 SAFETY AREA IMPROVEMENTS
 Gustavus, Alaska

FIGURE 1



LEGEND

- EXISTING RUNWAY
- EXISTING UNNAMED DITCH
- EXISTING UNNAMED STREAM
- EXISTING ROAD
- PROPOSED ROAD REALIGNMENT
- PROPOSED RSA DITCH
- PROPOSED UNNAMED DITCH REALIGNMENT
- PROPOSED UNNAMED STREAM REALIGNMENT
- PROPOSED RSA EXPANSION
- PROPOSED CULVERT
- EXISTING FENCE
- PROPOSED FENCE

NOTE: FOR CLARITY ALL CULVERTS NOT AFFECTED BY THE PROPOSED ACTION WERE OMITTED.

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PROPOSED ACTION

Sec 5,6,8,9

T40S, R 59E

Copper River Meridian, Alaska

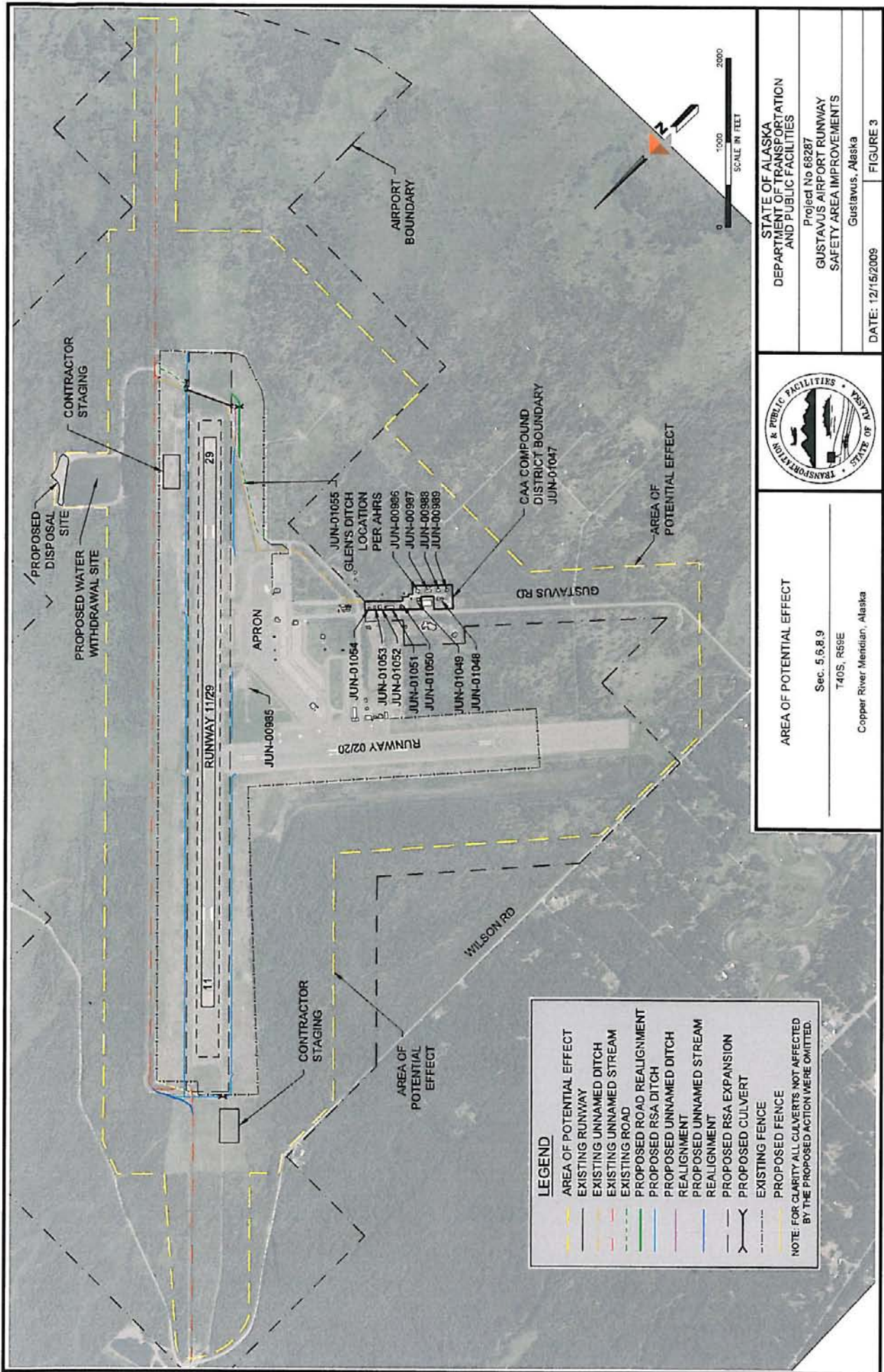


STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES

PROJECT No 68287
 GUSTAVUS AIRPORT RUNWAY
 SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: 12/15/2009 FIGURE 2



LEGEND

- AREA OF POTENTIAL EFFECT
- EXISTING RUNWAY
- EXISTING UNNAMED DITCH
- EXISTING UNNAMED STREAM
- EXISTING ROAD
- PROPOSED ROAD REALIGNMENT
- PROPOSED RSA DITCH
- PROPOSED UNNAMED DITCH
- REALIGNMENT
- PROPOSED UNNAMED STREAM
- REALIGNMENT
- PROPOSED RSA EXPANSION
- PROPOSED CULVERT
- EXISTING FENCE
- PROPOSED FENCE

NOTE: FOR CLARITY ALL CULVERTS NOT AFFECTED BY THE PROPOSED ACTION WERE OMITTED.

STATE OF ALASKA
 DEPARTMENT OF TRANSPORTATION
 AND PUBLIC FACILITIES

Project No 68287
 GUSTAVUS AIRPORT RUNWAY
 SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: 12/15/2009

FIGURE 3



AREA OF POTENTIAL EFFECT

Sec. 5.6.8.9
 T40S, R68E
 Copper River Meridian, Alaska

Enclosure 2

Historical review for the Gustavus Airport RSA Improvements Projects

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS & OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

550 WEST 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565

PHONE: (907) 269-8721

FAX: (907) 269-8908

May 18, 2010

File No.: 3130-1R FAA

Carl Schrader
Regional Environmental Coordinator
Department of Transportation and Public Facilities
PO Box 112506
Juneau, AK 99811-2506

Subject: Gustavus Airport Runway Safety Area

Dear Mr. Schrader:

This office received your letter on April 19, 2010 concerning the proposed expansion of the Gustavus Airport Runway Safety Area to meet current standards. We reviewed this undertaking for potential impacts to historic and archaeological resources pursuant to Section 106 of the National Historic Preservation Act. We do not concur with your finding of no historic properties adversely affected.

Gustavus Airfield Historic District

We do not agree with the Department of Transportation and Public Facilities (DOT&PF) determination that the World War II association of the Gustavus Airfield Historic District is insignificant. The comparative analysis in the DOT&PF response is for national significance of the historic district. We agree that the property is not nationally significant. However, the National Register of Historic Places (NRHP) evaluates properties for their local, state and national significance. The Gustavus Airfield Historic District is an important World War II related resource in Gustavus, at the local level.

Furthermore, we do not agree that the airfield lacks sufficient integrity to convey its significance. Historic properties can accommodate change without compromising all their historic integrity. Surfaces that wear over time, can be changed, and should be changed, as long as that change meets current preservation standards and lengthens the usefulness of the property. For example, roofs do not usually last hundreds of years. Reroofing a historic building is an acceptable preservation technique just as compatible resurfacing is an acceptable preservation approach for runways.

Airfield design appears to be relatively intact. Comparing the airport photos from 1948, 1959, and 2009, the spatial configuration, circulation system, topography, and

(cont.)

proportionality are evident. A person could recognize this historic district as a property dating from the identified period of significance.

Airfield Roads and Ditches

We agree with DOT&PF's finding that the roads and ditches are not individually eligible for listing in the NRHP. However, we do not agree with DOT&PF that the roads and ditches do not contribute to the Gustavus Airfield Historic District. Ditches and roads are planned features in the development of airfields. As such, they should be documented and listed as contributing elements.

The World War II period characteristics of the ditches and roads are not clearly identified. In order to evaluate these resources for their eligibility under Criterion C, it would be important to understand how the design of World War II ditches and roads differ from the post-war period or pre-war period. Without additional information, it is our opinion that the roads and ditches do not contain distinctive characteristics of the World War II period because they are not solely identifiable to the period outlined in the report.

Effect

We do not agree with DOT&PF's finding of No Historic Properties Adversely Affected. The Cultural Resources Consultants report clearly applies the criteria of adverse effects. The change in "proportionality to the runways," earlier identified as a characteristic that qualifies the property for the NRHP will be altered. Also disturbing the few remaining areas of original pavement will impact the original materials used for the runway, another character defining feature. Reconfiguration of the ditch system will also impact original design, workmanship, and location of those contributing resources. Collectively, these changes constitute an adverse effect.

To mitigate those impacts to the Gustavus Airfield Historic District, we recommend developing a Programmatic Agreement with our office that streamlines Operation and Maintenance activities at air transportation facilities throughout Alaska.

Please contact Doug Gasek at 269-8726 if you have any questions or need further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:dfg



U.S. Department
of Transportation

AIRPORTS DIVISION

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

**Federal Aviation
Administration**

November 8, 2010

Reply Refer To:
State Project #68287

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archaeology
550 W. 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

The Alaska Department of Transportation and Public Facilities (DOT&PF) sent a letter to your office on April 14, 2010 for the proposed Federal Aviation Administration's (FAA) funded Gustavus Runway Safety Area project. That letter contained DOT&PF's determinations made on behalf of the FAA of non-eligibility for the Gustavus airfield runways, roads, and ditches, with a finding of No Adverse Effect on the Civilian Aeronautics Administration (CAA) Gustavus Compound Historic District. Enclosed with that letter was a report done by Cultural Resources Consultants LLC (CRC) containing their recommendations to expand the existing historic district and a finding of an adverse affect¹. Your office responded on May 18, 2010 (your File No. 3130-1R FAA) in which you did not concur with DOT&PF. Rather, based on the CRC report, you suggested that there is a Gustavus Airfield Historic District associated with World War II (WWII) and there would be an adverse effect to that district from the proposed action.

The FAA and DOT&PF have evaluated your feedback regarding the potential historic district at this project site as well as re-assessed the project's potential to affect eligible properties. This letter provides our summary of the project's identification activities and subsequent coordination with your office and the National Park Service (NPS). Pursuant to 36 CFR 800.4(d)(2) and 36 CFR 800.5(d) (2), implementing regulations of Section 106 of the National Historic Preservation Act, FAA has determined that there is a Gustavus Airfield Historic District and finds an adverse effect on historic properties by the proposed project.

Gustavus Airfield Historic District (JUN-1093) Determinations of Eligibility

Background:

The CRC recommended a Gustavus Airfield Historic District (JUN-1093) (District) eligible under Criterion A with a period of significance from 1941 to 1958. CRC's report states that the "district represents the evolution in place of a "first-class" airfield and its continuing use and

¹ S. Meitl and M Yarborough, CRC. *Historical Review for the Gustavus Airport RSA Improvements Project (No. 68287)*, Gustavus Alaska. December 2009.

maintenance was part of broader patterns in Alaskan history". Recommended contributing elements of the District included the existing CAA Gustavus Compound Historic District (JUN-1047), the Airfield Runways (JUN-1094), the Airfield Roads (JUN-1095), and the Airfield Ditches (JUN-1096). From the CRC report (page 35):

The airfield runways, road system, and ditches are recommended as eligible for the National Register under Criterion A as contributing features of a Gustavus Airfield Historic District (JUN-01093). This new district, with a period of significance from 1941 to 1958, incorporates the linear features associated with the airfield—the runways, un-paved roads, a paved road, and ditches—and the earlier established CAA Historic District. The name change reflects the broad area of significance that this property represents. The expanded period of significance includes the years from 1941 to 1951 originally suggested by the Park Service for the CAA Historic District and the later dates—1948 to 1958—recommended by the SHPO. Expanding the concept of the district in both space and time from a post 1948 “compound” and including the runways, ditches, and roads—all of which available evidence indicates were under construction by 1941—follows both the Park Service’s assessment of the property and SHPO’s concerns and recommendations.

The CRC also recommended that the NRHP eligibility of the District is based on the co-existence of the runways, roads, ditches, and buildings (page 38).

Significance:

The DOT&PF disagreed with CRC’s recommendation that the airfield runways, road system, and ditches were eligible under Criterion A for the National Register of Historic Places (NRHP) as contributing features of an expanded district that includes the Gustavus Civil Aviation Administration (CAA) Compound Historic District (JUN-1047). One of the reasons for the disagreement was that CRC’s opinion relied on WWII design, location and workmanship of the runways, roads and ditches. The implication from CRC’s report is that Gustavus Airfield has national and state significance because of that WWII linkage. Your May 18th letter stated:

We agree that the property is not nationally significant. However, the National Register of Historic Places (NRHP) evaluates properties for their local, state and national significance. The Gustavus Airfield Historic District is an important World War II related resource in Gustavus at the local level.

The FAA and DOT&PF have considered your perspective, and FAA has determined that there is a Gustavus Airfield Historic District eligible for NRHP under Criterion A for its association with WWII and CAA. We agree that the District’s period of significance to be from 1941 to 1958 and that the District has local significance; however, the research done to date indicates that the significance is related more to the CAA than to WWII. Confirmation of significance will be addressed during subsequent research as proposed to be done under a Memorandum of Agreement (MOA) as discussed below. Figure 1 shows the District boundary based on current information.

District Contributing Properties:

1. Gustavus CAA Compound Historic District (CAA Compound) (JUN-1047):
The NPS previously determined the CAA Compound eligible for the NRHP under Criterion A, significant for its association with WWII and transportation, with a period of between

1941-1958. The CAA Compound contains 11 contributing properties and is located adjacent to the airport along Gustavus Road.

The FAA agrees with NPS's determination and furthermore determined that the CAA Compound also contributes to the Gustavus Airfield Historic District under Criterion A for its association with World War II and the CAA.

2. Airfield Runways (JUN-1094):

The CRC recommended the two runways as contributing elements of the District but not as individually eligible properties.

The runways provide a focus and a justification for activities that occurred in the district, while also providing form for the development of the surrounding area. Because of past changes, the runways do not have enough integrity to be recommended as individually eligible under Criterion A for their association with World War II and the CAA period, or under Criterion C as examples of World War II-era engineering in Alaska (page 35).

With regard to the runways, your May 18th letter stated:

Historic properties can accommodate change without compromising all their historic integrity. Surfaces that wear over time, can be changed, and should be changed, as long as that change meets current preservation standards and lengthens the usefulness of the property. ...Airfield design appears to be relatively intact...the spatial configuration, circulation system, topography, and proportionality are evident. A person could recognize this historic district as a property dating from the identified period of significance.

The FAA and DOT&PF have considered your perspective, and FAA has determined that the runways are not individually eligible for listing on the NRHP, but that they are contributing elements to the District under Criterion A for their association with World War II and the CAA.

3. Airfield Roads (JUN-1095) and Airfield Ditches (JUN-1096):

From the CRC report (page 36):

The roads within modern airport property are recommended as eligible under Criterion A as part of the Gustavus Airfield Historic District for their World War II and CAA association. They are also recommended as individually eligible under Criterion C as an example of World War II-era engineering in Alaska.

From the CRC report (page 37):

The airfield ditches are recommended as eligible under Criterion A as contributing features of the Gustavus Airfield Historic District for their World War II and CAA association. They are also recommended as individually eligible under Criterion C as well preserved examples of World War II-era engineering in Alaska.

With regard to the roads and ditches, your May 18th letter stated:

We agree with DOT&PF's finding that the roads and ditches are not individually

eligible for listing in the NRHP. However, we do not agree with DOT&PF that the roads and ditches do not contribute to the Gustavus Airfield Historic District. Ditches and roads are planned features in the development of airfields. As such, they should be documented and listed as contributing elements. [I]t is our opinion that the roads and ditches do not contain distinctive characteristics...because they are not solely identifiable to the period outlined in the report.

The FAA and DOT&PF have considered your perspective, and FAA has determined that the roads and ditches are not individually eligible for listing on the NRHP, but that they are contributing elements to the District under Criterion A for their association with World War II and the CAA. A portion of Gustavus Road is within the airport boundaries and is therefore part of the Airfield Roads property (JUN-1095). The FAA has determined in consultation with DOT&PF that Gustavus Road in its entirety (to its junction with Wilson Road) contributes to the District.

Gustavus Airfield Historic District (JUN-1093) Findings of Effect

1. District (JUN-1093):

Recommendations from the CRC report (pages 38-39):

Despite past changes, the district as a whole retains many of the seven aspects of integrity. All of the proposed changes associated with the upgrade of the Gustavus Airport are either at or near the runways and have potential to affect the eligibility of the district and individual properties within it. Because of the cumulative magnitude of the effect of the proposed project, CRC recommends the effect on the district be considered adverse.

With regard to the roads and ditches, your May 18th letter stated:

The [CRC] report clearly applies the criteria of adverse effects. The change in proportionality to the runways," earlier identified as a characteristic that qualifies the property for the NRHP will be altered. Also disturbing the few remaining areas of original pavement will impact the original materials used for the runway, another character defining features. Reconfiguration of the ditch system will also impact original design, workmanship, and location of those contributing resources. Collectively, these changes constitute an adverse effect.

The FAA and DOT&PF have considered your input. The FAA agrees with CRC's recommendation and finds that the proposed project will have an adverse effect on the characteristics that qualify the Gustavus Airfield Historic District for inclusion in the NRHP. The proportionality to the runways, a characteristic that qualifies the Gustavus Airfield Historic District for the NRHP, will be altered. Reconfiguring the ditch system will also impact the original design, workmanship, and location of those contributing resources. Collectively, these changes constitute an adverse effect.

2. CAA Compound (JUN-1047):

There were no recommendations from the CRC report. However, FAA finds that the proposed project would have no direct or indirect effect on the CAA Compound, which is located approximately 1,700 feet southwest of Runway 11/29. The proposed upgrades pertain to the runway and would not involve the CAA Compound.

3. Airfield Runways (JUN-1094):
From the CRC report:

The proposed lengthening (by over 1,200 feet) and widening (by 238 feet) of the runway safety area [RSA] for Runway 11/29 would change its design and workmanship, and affect the still apparent...spatial arrangement of the airfield...resulting in a loss of proportionality between the runways... Construction activities...could also damage or destroy the few remaining areas of original pavement... (page 38).

The FAA agrees with CRC's recommendation and finds that the proposed project will have an adverse effect on the runways (as it would impact integrity aspects of design, workmanship, and setting (the runways' proportionality)).

Recent communication with a former Glacier Bay Park Superintendent clarifies that the pavement has been substantially altered and is not the original pavement. Enclosed is a summary of the interview with the prior Park Superintendent with some additional information about the runway surfacing materials.

The FAA has considered the information provided by the Park Superintendent and has determined that the pavement lacks sufficient integrity to convey significance.

4. Airfield Roads (JUN-1095):
From the CRC report:

The only planned change to the airport road system will occur southwest of Runway 11/29. Here, a portion of a road is contained in the RSA expansion area. However, the road would still be graded and drivable...these changes, however, are to a road section that was altered in 1996 and will not adversely affect the overall eligibility of the district or the roads themselves.

The FAA agrees with CRC's recommendation and finds that the proposed project will have no adverse effect on the roads.

5. Airfield Ditches (JUN-1096):
From the CRC report:

The increase in distance between the landing area and the ditches would also constitute a serious departure from World War II-era design, which called for a much shorter and narrower safety area bounded by ditches...this too would affect the airfield's proportionality, a key design element... As long as the ditches are replaced "in-kind"... will not be adversely affected.

The FAA agrees with CRC's recommendation and finds that the proposed project will have no adverse effect on the ditches.

Consultation:

We sent consultation letters to the following federally recognized Tribal entities on November 4, 2009:

- Central Council of Tlingit and Haida Tribes of Alaska

- Hoonah Indian Association
- Huna Totem Corporation
- Sealaska Heritage Institute
- Sealaska Corporation

We sent consultation letters to these consulting parties on April 6, 2009:

- National Park Service, Glacier National Park
- State Historic Preservation Officer
- City of Gustavus

In response to the consultation letter we only received one reply. The NPS responded that the proposed project would have No Effect on historic structures JUN- 985 to 989 and JUN-1047 to 1055. Follow up calls were made to all parties. Sealaska Heritage requested a copy of the CRC report.

DOT&PF has also conferred with the NPS several times regarding their interest in commenting on the proposed Gustavus Airfield Historic District which encompasses their CAA Compound Historic District. On September 21st, DOT&PF discussed the expanded boundary and our proposed adverse effect finding with Wayne Howell/NPS. He understood our position and did not anticipate a problem for the NPS. He also asked that the NPS be kept informed on the boundaries of the district. On September 29th, DOT&PF discussed these same issues with Janet Clemens/NPS. Janet also stated that she did not see a problem for the NPS and would appreciate being consulted as we move forward. She explained that the NPS has no immediate plans to nominate the CAA district. The NPS generally nominates properties it holds that have been determined eligible, but the CAA Compound Historic District is a low priority. Regardless of what FAA does, at some point in the future the NPS will do a more detailed evaluation and make a new determination as part of any National Register nomination. They have declined to formally comment at this time.

Based on the above documentation, the FAA finds that the proposed project will have an adverse effect on the characteristics that qualify the Gustavus Airfield Historic District for inclusion in the NRHP.

On September 15, 2010 FAA and DOT&PF consulted with Doug Gasek of your office regarding the finding of an adverse effect from construction of an expanded runway safety area around runway 11/29 to identify appropriate mitigation options. In your letter dated May 18, 2010, a recommendation was made to develop a Programmatic Agreement (PA) with FAA to streamline operation and maintenance (M&O) activities at air transportation facilities throughout Alaska. During the September 15, 2010 discussion, FAA explained that we do not anticipate a lot of ongoing FAA involvement at this airport, and therefore does not think there would be a lot of benefit to developing a PA at the Gustavus Airport. FAA believes that it would be more appropriate for focus on the development of a MOA to resolve the adverse effect to the Gustavus Airfield Historic District. Doug indicated he was comfortable with this rationale and emphasized we should consider the development of a PA for other airports where a higher level of FAA involvement is expected.

To mitigate for the adverse effect, FAA and DOT&PF propose to develop a more thorough historic context and evaluation of the Gustavus Airfield Historic District. The additional research will establish a comprehensive basis to better understand the significance of the District and its

contributing features, and to assess and identify what physical components should be present to demonstrate integrity.

During the development of the MOA, we will formally contact the NPS, the City of Gustavus, the Central Council of Tlingit and Haida Tribes of Alaska, the Hoonah Indian Association, the Huna Totem Corporation, the Sealaska Corporation, and the City of Gustavus to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of the MOA. Once we receive your response, we will continue to consult with your office to finalize the mitigation measures needed to resolve the adverse effects of the proposed project.

Please direct your concurrence or comments to me at the address above, by telephone at (907) 271-5454 or by e-mail at Patricia.Sullivan@faa.gov.

Sincerely,



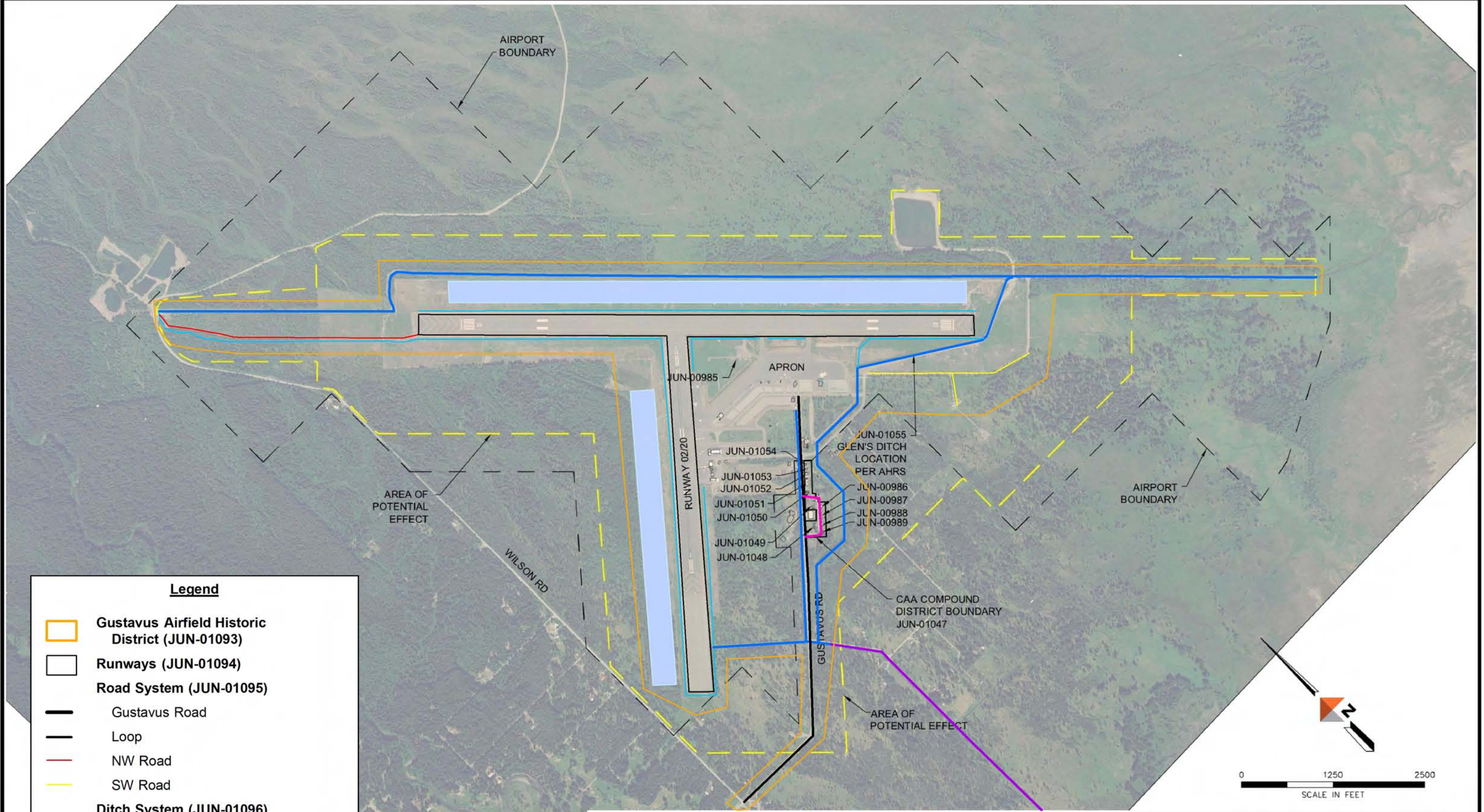
Patricia A. Sullivan
Environmental Program Manager

Enclosure:

Figure 1 – Gustavus Airfield Historic District Boundaries

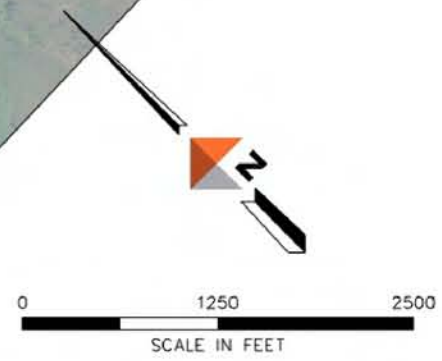
cc w/o enclosures:

Chuck Tripp, P.E., DOT&PF Southeast Region, Project Manager
Jane Gendron, DOT&PF Southeast Regional Environmental Manager
Laurie Mulcahy, DOT&PF Cultural Resources Manager
Michael Kell, DOT&PF Southeast Region, Cultural Resource Specialist
Jim Scholl, DOT&PF Southeast Region, Project Environmental Analyst



Legend

- Gustavus Airfield Historic District (JUN-01093)
- Runways (JUN-01094)
- Road System (JUN-01095)**
- Gustavus Road
- Loop
- NW Road
- SW Road
- Ditch System (JUN-01096)**
- Collector Ditch
- Feeder Ditch
- Glen's Ditch
- Fill Depressions/Catchment Areas



Historic Properties

Sec. 5,6,8,9
T40S, R59E
Copper River Meridian, Alaska



STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

Project No 68287
GUSTAVUS AIRPORT RUNWAY
SAFETY AREA IMPROVEMENTS

Gustavus, Alaska

DATE: 09/14/2010 FIGURE 5

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS & OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

550 WEST 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565

PHONE: (907) 269-8721

FAX: (907) 269-8908

December 13, 2010

File No.: 3130-1R FAA
3330-6 JUN-1093

Patricia A. Sullivan
Environmental Program Manager
Federal Aviation Administration
222 West 7th Avenue, Box 14
Anchorage, AK 99513-7587

Subject: Gustavus Airfield Historic District

Dear Ms. Sullivan:

This office received your letter on November 10, 2010 concerning the proposed improvements to the Gustavus Airfield Historic District. We reviewed this undertaking for potential impacts to historic and archaeological resources pursuant to Section 106 of the National Historic Preservation Act. We agree with your determination that the Gustavus Airfield Historic District is eligible for listing in the National Register of Historic Places. We also agree that the undertaking will result in Historic Properties Adversely Affected.

We look forward to working with you to develop a Memorandum of Agreement (MOA) to resolve the adverse effects associated with this undertaking. Key components of the MOA could include continued evaluation of the Gustavus Airfield Historic District to clearly define the significance, integrity and contributing elements of the historic district.

Please contact Doug Gasek at 269-8726 if you have any questions or need further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:dfg



U.S. Department
of Transportation

Alaskan Region Airports Division

222 W. 7th Avenue, Box 14
Anchorage, Alaska 99513-7587
Tel. (907) 271-5438/Fax (907) 271-2851

**Federal Aviation
Administration**

DEC 16 2010

Blythe Semmer
Federal Permitting, Licensing, and Assistance Section
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue NW, Suite 809
Washington D.C. 20004

Dear Ms. Semmer:

In Reply Refer To:
Gustavus Airport Runway Safety Area, State Project #68287
Finding of Adverse Affect Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2)

The Alaskan Region of the Federal Aviation Administration (FAA) and airport sponsor, the Alaska Department of Transportation and Public Facilities (DOT&PF) are proposing to expand the Runway Safety Area (RSA) at the Gustavus Airport in Gustavus, Alaska (Figure 1). The project is located in Sections 5, 6, 8 and 9 of Township 40 South, Range 59 East, in the Copper River Meridian (58.426° North Latitude, 135.707° East Longitude), United States Geological Survey Quadrangle Juneau B-6 NE. The Area of Potential Effect (APE) for this project is shown on Figure 2.

Pursuant to 36 CFR 800.4(d)(2) and 800.5(d)(2), implementing regulations of Section 106 of the National Historic Preservation Act, the FAA finds an adverse effect on historic properties would result from the proposed project. Accordingly, the FAA is notifying the Advisory Council on Historic Preservation (ACHP) and extending an invitation to participate in the FAA's finding and resolution of adverse effect.

Proposed Project

The project would consist of the following (Figure 3):

Increase the length of the RSA for Runway 11/29 by adding 409 feet at runway end 11 and 799 feet at runway end 29;

Widen the entire RSA of Runway 11/29 by 238 feet;

Grade a section of an airport maintenance road that occurs within the extent of the RSA;

Reroute 1,400 linear feet of airport maintenance road to relocate it outside of the proposed RSA expansion;

Regrade and realign RSA ditches as needed;

Realign a portion of airport fence to accommodate the RSA expansion;

Apply an Asphalt Emulsified Surface (AES) to the entire RSA;

Remove one culvert near the end of runway end 11;

Move and replace one culvert near the end of runway end 29;

Install one new culvert in the existing ditch under the RSA area off the end of runway 29;

Install one new culvert in a new ditch parallel to the runway near the runway end 29 supplemental wind cone; and
Adjust and replace electrical facilities as needed.

The Area of Potential Effect (APE) includes the airport's existing footprint and associated ditches and extends approximately 500 feet beyond the ditch area (Figure 2).

Results of Identification Efforts

Enclosed with this letter is a report done by our archaeological consultant, Cultural Resources Consultants LLC (CRC), containing the results of their research on historic properties within the project APE, recommendations to expand the existing historic district, and a finding of an adverse affect¹.

Gustavus Airfield Historic District (JUN-1093) Determinations of Eligibility

Background:

CRC recommended a *Gustavus Airfield Historic District (JUN-1093)* (District) eligible under Criterion A with a period of significance from 1941 to 1958. CRC's report states that the "district represents the evolution in place of a "first-class" airfield and its continuing use and maintenance was part of broader patterns in Alaskan history". Recommended contributing elements of the District included the existing CAA Gustavus Compound Historic District (JUN-1047), the Airfield Runways (JUN-1094), the Airfield Roads (JUN-1095), and the Airfield Ditches (JUN-1096). From the CRC report: (page 35)

The airfield runways, road system, and ditches are recommended as eligible for the National Register under Criterion A as contributing features of a Gustavus Airfield Historic District (JUN-01093). This new district, with a period of significance from 1941 to 1958, incorporates the linear features associated with the airfield—the runways, un-paved roads, a paved road, and ditches—and the earlier established CAA Historic District. The name change reflects the broad area of significance that this property represents. The expanded period of significance includes the years from 1941 to 1951 originally suggested by the Park Service for the CAA Historic District and the later dates—1948 to 1958—recommended by the SHPO. Expanding the concept of the district in both space and time from a post 1948 "compound" and including the runways, ditches, and roads—all of which available evidence indicates were under construction by 1941—follows both the Park Service's assessment of the property and [State Historic Preservation Office] SHPO's concerns and recommendations.

CRC also recommended that the National Register of Historic Places (NRHP) eligibility of the District is based on the co-existence of the runways, roads, ditches, and buildings. (page 38)

Significance:

FAA has determined that there is a Gustavus Airfield Historic District eligible for NRHP under Criterion A for its association with World War II (WWII) and Civilian Aeronautics Administration (CAA). We agree that the District's period of significance is from 1941 to 1958 and that the District has local significance; however, the research done to date indicates that the significance is related more to the CAA than to WWII. Confirmation of significance will be addressed during subsequent research as proposed to be done under a Memorandum of

¹ S. Meitl and M Yarborough, CRC. *Historical Review for the Gustavus Airport RSA Improvements Project (No. 68287)*, Gustavus Alaska. December 2009.

Agreement (MOA) as discussed below. Figure 2 shows the District boundary based on current information.

District Contributing Properties:

Gustavus CAA Compound Historic District (CAA Compound) (JUN-1047):

The National Park Service (NPS) previously determined the CAA Compound eligible for the NRHP under Criterion A, significant for its association with WWII and transportation, with a period between 1941-1958. The CAA Compound contains 11 contributing properties and is located adjacent to the airport along Gustavus Road.

The FAA agrees with NPS's determination and has furthermore determined that the CAA Compound also contributes to the Gustavus Airfield Historic District under Criterion A for its association with WWII and the CAA.

Airfield Runways (JUN-1094):

The runways provide a focus and a justification for activities that occurred in the District, while also providing form for the development of the surrounding area. Because of past changes, the runways do not have enough integrity to be recommended as individually eligible under Criterion A for their association with WWII and the CAA period, or under Criterion C as examples of WWII-era engineering in Alaska. (page 35 of enclosed report).

FAA has determined that the runways are not individually eligible for listing on the NRHP, but that they are contributing elements to the District under Criterion A for their association with WWII and the CAA.

Airfield Roads (JUN-1095) and Airfield Ditches (JUN-1096):

FAA has determined that the roads and ditches are not individually eligible for listing on the NRHP, but that they are contributing elements to the District under Criterion A for their association with WWII and the CAA. A portion of Gustavus Road is within the airport boundaries and is therefore part of the Airfield Roads property (JUN-1095). The FAA has determined in consultation with DOT&PF that Gustavus Road in its entirety (to its junction with Wilson Road) contributes to the District.

Gustavus Airfield Historic District (JUN-1093) Findings of Effect

District (JUN-1093):

Despite past changes, the District as a whole retains many of the seven aspects of integrity. All of the proposed changes associated with the upgrade of the Gustavus Airport are either at or near the runways and have potential to affect the eligibility of the District and individual properties within it. Because of the cumulative magnitude of the effect of the proposed project, FAA finds that the proposed project will have an adverse effect on the characteristics that qualify the Gustavus Airfield Historic District for inclusion in the NRHP. The proportionality to the runways, a characteristic that qualifies the Gustavus Airfield Historic District for the NRHP, will be altered. Reconfiguring the ditch system will also impact the original design, workmanship, and location of those contributing resources. Collectively, these changes constitute an adverse effect.

CAA Compound (JUN-1047):

FAA finds that the proposed project would have no direct or indirect effect on the CAA Compound, which is located approximately 1,700 feet southwest of Runway 11/29. The proposed upgrades pertain to the runway and would not involve the CAA Compound.

Airfield Runways (JUN-1094):

The proposed lengthening (by over 1,200 feet) and widening (by 238 feet) of the runway safety area [RSA] for Runway 11/29 would change its design and workmanship, and affect the still apparent...spatial arrangement of the airfield...resulting in a loss of proportionality between the runways... Construction activities...could also damage or destroy the few remaining areas of original pavement. (page 38 of the CRC report)

The FAA finds that the proposed project will have an adverse effect on the runways (as it would impact integrity aspects of design, workmanship, and setting (the runways' proportionality)).

Recent communication with a former Glacier Bay Park Superintendent clarifies that the pavement has been substantially altered and is not the original pavement. Enclosed is a summary of the interview with the former Glacier Bay Park Superintendent with additional information about the runway surfacing materials.

The FAA has considered the information provided by the Park Superintendent and has determined that the pavement lacks sufficient integrity to convey significance.

Airfield Roads (JUN-1095):

The only planned change to the airport road system will occur southwest of Runway 11/29. Here, a portion of a road is contained in the RSA expansion area. However, the road would still be graded and drivable...these changes, however, are to a road section that was altered in 1996 and will not adversely affect the overall eligibility of the district or the roads themselves.

The FAA finds that the proposed project will have no adverse effect on the roads.

Airfield Ditches (JUN-1096):

The increase in distance between the landing area and the ditches would also constitute a serious departure from WWII-era design, which called for a much shorter and narrower safety area bounded by ditches...this too would affect the airfield's proportionally, a key design element... As long as the ditches are replaced "in-kind"...will not be adversely affected.

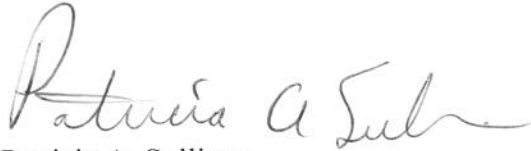
The FAA finds that the proposed project will have no adverse effect on the ditches.

The FAA has consulted with the Alaska State Historic Preservation Officer (SHPO), taken their views into consideration and revised our initial determination of eligibility and no adverse effect finding. The SHPO concurs with FAA's revised finding that the proposed project will cause an adverse affect on the Gustavus Airfield Historic District. We are consulting with the SHPO, who has agreed to move forward with the development of a Memorandum of Agreement (MOA), and have contacted the other consulting parties to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of the MOA.

Please advise me of the Advisory Council on Historic Preservation's (ACHP) interest in participating in consultation for the resolution of adverse effects, and if the ACHP would like to be a signatory to a MOA to mitigate the adverse effects associated with the project.

If you wish to discuss this project with me, I can be reached at the address above, by telephone at 907-271-5454, or by e-mail at Patricia.Sullivan@faa.gov.

Sincerely,



Patricia A. Sullivan
Environmental Program Manager

Enclosures:

Figure 1 – Vicinity Map

Figure 2 – Historic Property Location Map

Figure 3 – Proposed Action

Cultural Resource Consultants 2009. *Historical Review for the Gustavus Airport RSA Improvements Project (No. 68287), Gustavus, Alaska.*

Summary of Interview with former Glacier Bay Park Superintendent

DOT&PF Letter to SHPO dated April 14, 2010

SHPO Letter of Non-concurrence dated May 18, 2010

FAA revised findings Letter to SHPO dated November 8, 2010

SHPO Letter of Concurrence Dated December 13, 2010

cc w/o enclosures:

Chuck Tripp, P.E., DOT&PF Southeast Region, Project Manager

Jane Gendron, DOT&PF Southeast Region, Regional Environmental Manager

Laurie Mulcahy, DOT&PF, Cultural Resources Manager

Michael Kell, DOT&PF Southeast Region, Cultural Resource Specialist

Jim Scholl, DOT&PF Southeast Region, Project Environmental Analyst



United States Department of the Interior



NATIONAL PARK SERVICE

Glacier Bay National Park and Preserve

P.O. Box 140

Gustavus, Alaska 99826-0140

Tel: 907-697-2230 · Fax: 907-697-2654

IN REPLY REFER TO:

H4217

JAN 4 2011

Ms. Patricia Sullivan
Environmental Program Manager
Alaska Region Airports Division
222 W. 7th Avenue, Box 14
Anchorage, Alaska 99513-7587

Dear Ms. Sullivan:

I am writing in response to your November, 2010, letter seeking comments on the proposed Memorandum of Agreement (MOA) to offset the adverse effects of the proposed expansion of the Runway Safety Area (RSA) at the Gustavus Airport (State Project #68287). I apologize for our tardiness in responding as the arrival of your letter coincided with a perfect storm of office remodeling and holidays.

In reviewing the proposed undertaking, and in consultation with my staff who have been involved in this process, I concur with your determination of adverse effect to the runway's layout and proportionality, and of the need to develop an MOA as a way to mitigate those effects. I also agree with the need to keep the MOA focused on the local resource as opposed to a more general Programmatic Agreement to deal with FAA operations statewide. The National Park Service is supportive of your proposal for additional research to help us better understand the influences and impacts that this important historical event had on our landscape, the local community, and ultimately, on the development of Glacier Bay National Park.

The National Park Service is interested in participating in consultation to resolve the adverse effects of the proposed project and in development of the MOA. Our Cultural Resource Program Manager, Michele Jespersen, will be our point of contact for this process. She can be contacted at: 907-697-2606, or by email at: michele_jespersen@nps.gov.

Sincerely,

Susan L. Boudreau
Superintendent

**TAKE PRIDE[®]
IN AMERICA** 



Preserving America's Heritage

January 12, 2011

Ms. Patricia Sullivan
Environmental Program Manager
Federal Aviation Administration
222 W. 7th Avenue, Box 14
Anchorage, AK 99513-7587

Ref: *Proposed Expansion of the Runway Safety Area at the Gustavus Airport in Gustavus, Alaska*

Dear Ms. Sullivan:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Alaska State Historic Preservation Office (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require further assistance, please contact Mr. Anthony Guy Lopez at 202-606-8525 or at alopez@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

----- Forwarded by Patricia Sullivan/AAL/FAA on 01/18/2011 01:21 PM -----

From: Michele_Jespersion@nps.gov

To: Patricia Sullivan/AAL/FAA@FAA

Cc: Wayne_Howell@nps.gov, Bruce Greenwood/AAL/FAA@FAA

Date: 01/18/2011 09:59 AM

Subject: Re: Gustavus Airport Draft MOA

Patti,

Wayne and I reviewed the MOA. Here are GLBA's comments. Wayne initially commented and I had nothing else to add. Also attached is a map depicting the entire landscape. Thanks, Patti.

(See attached file: MOA Gustavus Airfield Landscape.docx)

(See attached file: Gustavus AirportLandscape.pdf)

Michele M. Jesperson
Cultural Resources Management Specialist
Glacier Bay National Park and Preserve
P.O. Box 140
Gustavus, AK 99826
(907) 697-2606

**Memorandum of Agreement
between the
Federal Aviation Administration
and the
Alaska State Historic Preservation Officer
Regarding the Gustavus Airport Runway Safety Area
Improvement Project at Gustavus, Alaska
State Project No. 68287**

WHEREAS, the Federal Aviation Administration (FAA) Alaskan Region Airports Division, in cooperation with the Alaska Department of Transportation and Public Facilities (DOT&PF) Southeast Region, an applicant for federal assistance, proposes to expand the runway safety area at the Gustavus Airport to resolve operational deficiencies and to meet current FAA standards (undertaking); and

WHEREAS, FAA has determined that the Gustavus Airfield Historic District (JUN-1093) is eligible for the National Register of Historic Places (NRHP), and that the Civilian Aeronautics Administration (CAA) Gustavus Compound Historic District (JUN-1047), the Airfield Runways (JUN-1094), the Airfield Roads (JUN-1095), and the Airfield Ditches (JUN-1096) are contributing properties; and

WHEREAS, the National Park Service (NPS) previously determined the CAA Gustavus Compound Historic District eligible for the NRHP; and

WHEREAS, FAA has determined that the undertaking will have an adverse effect on the Gustavus Airfield Historic District; and

WHEREAS, FAA consulted with Alaska State Historic Preservation Officer (SHPO) in accordance with Section 106 of the National Historic Preservation Act (NHPA) (U.S.C. 470s) and 36 CFR 800; and

WHEREAS, FAA has invited the Advisory Council on Historic Preservation (Advisory Council) to participate and they have declined to participate; and

WHEREAS, FAA consulted with NPS and the City of Gustavus, pursuant to 36 CFR 800; and

WHEREAS, FAA consulted with the Central Council of Tlingit and Haida Tribes of Alaska, the Hoonah Indian Association, the Huna Totem Corporation, the Sealaska Corporation pursuant to 36 CFR Section 800.2(c)(2); and

WHEREAS, DOT&PF as project sponsor participated in consultation pursuant to 36 CFR 800 and is signing this agreement as an Invited Signatory in this MOA; DOT&PF shall be responsible to administer and implement the stipulations under the terms of the

Comment [wkh1]: Add: "and recognized the potential of a Gustavus Airfield cultural landscape"

MOA for and as directed by FAA; and

NOW, THEREFORE, FAA, SHPO, [NPS \(? and City of Gustavus\)](#) and DOT&PF (collectively the “Signatories”) agree that the undertaking shall be implemented in accordance with the following stipulations in consideration of the effects this undertaking will have on the Gustavus Airfield Historic District.

STIPULATIONS

The FAA in coordination with DOTPF shall ensure that the following stipulations are implemented:

A. Historic Context and Evaluation

1. The DOT&PF shall develop a report containing a thorough historic context and evaluation of the Gustavus Airfield Historic District. The report will document additional research conducted to establish a comprehensive basis to understand the significance of the District, ~~and~~ its contributing features and the influence of this historic event on the eventual development of Gustavus and Glacier Bay National Park. It will include:
 - a. Historic Overview. Additional information on the period of significance, particularly the extent of World War II and CAA construction and use of the airport, and the effects of airport construction on the eventual development of Gustavus and Glacier Bay National Park.
 - b. A more thorough identification and description of all remaining character-defining features, a listing of original features that have been destroyed or altered, and an evaluation of integrity of the contributing elements.
 - c. A graphic depiction showing the proposed boundary of the historic district and contributing elements.
2. The DOT&PF, with oversight from FAA, shall ensure that the draft report is submitted to SHPO and NPS for comment and verification of completion within twelve (12) months after signing this Agreement.
 - a. The SHPO and NPS shall provide DOT&PF with review comments no later than thirty (30) days after receipt of the documentation.
 - b. The DOT&PF shall take into account comments received during the review period.
 - c. The final report shall be submitted to SHPO and NPS within two (2) months of the receipt of the draft comments.
3. The report shall meet contemporary professional standards and follow the Alaska Office of History and Archaeology (OHA) Standards and Guidelines for Investigating and Reporting Archaeological and Historical Properties in Alaska (Historic Preservation “Series #11) and the Secretary of the Interior’s Standards

Comment [wkh2]: Here it is worthwhile to include in the overview a section that looks at the consequences of the Gustavus Airport construction. If not built, Gustavus would not exist, and park headquarters would be located inside Glacier Bay. The event had permanent a far reaching consequences.

Comment [wkh3]: Not all of the structures within the proposed district have been identified. For example, there is a beautiful shed building, in pristine condition, that nobody has yet documented. And there will be others. So, a more thorough inventory. Also, we have photographs of other structures that have either been destroyed or moved – they are scattered here and there around Gustavus. It would be good to use the Len Grau photographs (1964) for this purpose. For example – we have a picture of a building from 1964 that is no longer there, but its concrete slab remains. This should be documented.

Comment [wkh4]: I am going to suggest here the addition of an item D: When NPS first poked a finger into this historic district, we focused in tight, first considering only the historic structures owned by NPS. SHPO asked that we expand it to include the other structures along the main road, so we did and that became the Compound District. Then Meitl and Yarborough have expanded to include the airport and its immediate features, but stopped there. If we are going to do this, let’s do it right. Have the contractor look at all of the inter-related features from this event throughout the broader Gustavus area – the roads, ditches, navigational arrays, waterfront features, etc. NPS produced a map indicating all of the features in the original DOE package, and I attach it to message. Identify all of the features on the landscape, then in consul... [1]

Comment [wkh5]: I would like to see a fourth category that would be a file of scanned photographs, maps, and documents that could be easily adapted into interpretive materials, such as wayside exhibits, interpretive brochures, and such. Currently, this stuff is scattered and of variable quality. Have the contractor pull it all together to certain standards and make it available.

Comment [wkh6]: On that thought, would it be too much to ask that the DOT contractor produce an executive summary document, with photos, maps, basic history, in glossy format, that would be suitable for sharing with local lodges, businesses, etc.? in essence, a publication, which should be attractive to any contractor and usable by everybody involved. That way the historic landscape can be shared with visitors. The intent here is, rather than produce a report that only a few people ... [2]

and Guidelines for reports (48 FR 44734-44737).

B. Professional Standards

All work pursuant to this MOA shall be developed by or under the supervision of a person or persons who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards in architectural history (Federal Register Vol. 62, No.119, pp. 33719).

C. Treatment of Human Remains

1. Although unlikely to be encountered, any and all human remains shall at all times be treated with dignity and respect. Should human remains be encountered, work will be stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify the Alaska State Troopers (AST), FAA, and SHPO. If the human remains are determined or believed by investigators to be Native, local Tribes shall be notified immediately. See Appendix A for specific contact information for Agency and Tribal Officials involved with human remains consultation.
2. If the remains appear recent, FAA and DOT&PF shall defer to the opinion of AST and/or the State Medical Examiner (SME) for a determination of whether the remains are of a forensic nature and/or subject to criminal investigation.
3. A physical anthropologist experienced in the analysis of human remains shall examine the human remains to determine racial identity. The physical anthropologist shall document, analyze, and photograph the remains so that an independent assessment of racial identity can be made. The physical anthropologist shall be afforded no more than thirty (30) days time to conduct his or her analysis.
4. If the human remains are not Native American, and a determination has been made by AST and SME that a death investigation is not warranted, then FAA and DOT&PF in consultation with SME, will identify, locate and inform descendants of the deceased. If no descendants are found, any necessary permits from the Alaska State Bureau of Vital Statistics will be obtained and the remains re-interred in a designated area.
5. Should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001) be encountered, work shall be stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify FAA, SHPO, and the Hoonah Indian Association.

Comment [d7]: Is there federal property in the APE

Comment [wkh8]: Yes, there is NPS property in the APE.

D. Inadvertent Discoveries

If, during the implementation of the undertaking, a previously unidentified historic property is encountered, or a previously identified historic property is affected in an unanticipated manner, DOT&PF shall consult with FAA, SHPO, the Hoonah Indian Association, ANCSA Corporations, and other consulting parties as appropriate pursuant to 36 CFR 800.13. The DOT&PF will ensure that work shall cease in the area of the discovery until the previously unidentified historic property or unanticipated effect can be evaluated, and an appropriate treatment plan consistent with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716) is developed and agreed upon by SHPO. The DOT&PF shall insure that the treatment plan is implemented.

E. Review

The Signatories shall review this MOA two (2) years from its execution date and every year thereafter until all measures are completed or until **DECIDED UPON COMPLETION DATE**. The DOT&PF shall submit a biannual letter status update to MOA Signatories one (1) month prior to the biannual review and annually thereafter. Any amendments to this MOA recommended during the review shall be considered in accordance with CFR 800.6(c)(7). If the review results in a recommendation to terminate the MOA, termination of the MOA shall be considered in accordance with 36 CFR 800.6(c)(8).

F. Dispute Resolution

1. Should any Signatory to this MOA object in writing to the other Signatories regarding any action carried out or proposed with respect to the implementation of this MOA, consultation among the signatories shall be initiated to resolve the objections.
2. If FAA determines that the Section 106 related objection cannot be resolved through consultation, it shall request the further comments or staff level recommendations from ACHP pursuant to 36 CFR 800.6(b). Any ACHP comment provided in response to such a request will be taken into account by FAA in accordance with 36 CFR 800.6(c)(2).
3. At any time during implementation of any stipulation in this MOA, should an objection to any such stipulation or its manner of implementation be raised by a member of the public, FAA shall take the objection into account and consult as needed with the objecting party and parties to this agreement to address the objection.

G. Amendment

Any Signatory to this agreement may request that this MOA be amended, whereupon they shall consult in accordance with 36 CFR § 800.6(c)(7) to consider such amendment. Amendments shall be executed in the same manner as the original MOA.

H. Duration

This MOA shall continue in full force and effect until all measures for are completed or until **DECIDED UPON COMPLETION DATE**. At any time DOT&PF may request FAA, SHPO, and NPS in writing to review DOT&PF's project schedule and consider an extension or modification of this MOA. No extension or modification shall be effective unless all Signatories to the MOA have agreed to it in writing.

I. Termination

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

J. **Execution and Implementation** of this Memorandum of Agreement evidences that FAA has consulted with the SHPO and NPS on the Gustavus Runway Safety Area Improvement Project and its effects on historic properties, and has taken into account the undertaking's effects on historic properties, and satisfied Section 106 responsibilities.

SIGNATORIES:

FEDERAL AVIATION ADMINISTRATION

By: _____ Date: _____
(Name, Title)

ALASKA STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: _____
(Name, Title)

NATIONAL PARK SERVICE

By: _____ Date: _____
(Name, Title)

INVITED SIGNATORY:

ALASKA DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES

By: _____ Date: _____

(Name, Title)

CONCURRING PARTY:

CITY OF GUSTAVUS

By: _____ Date: _____

(Name, Title)

Page 2: [1] Comment [wkh4]

whowell

1/6/2011 5:41:00 PM

I am going to suggest here the addition of an item D: When NPS first poked a finger into this historic district, we focused in tight, first considering only the historic structures owned by NPS. SHPO asked that we expand it to include the other structures along the main road, so we did and that became the Compound District. Then Meitl and Yarborough have expanded to include the airport and its immediate features, but stopped there. If we are going to do this, let's do it right. Have the contractor look at all of the inter-related features from this event throughout the broader Gustavus area – the roads, ditches, navigational arrays, waterfront features, etc. NPS produced a map indicating all of the features in the original DOE package, and I attach it to message. Identify all of the features on the landscape, then in consultation with SHPO, nominate the landscape, not just portions of it. Otherwise, through time we will continue to look at elements of it piecemeal, as has happened in the past, rather than as a whole. Language: “Inventory and describe all of the features constructed in association with the Gustavus Airport, and if determine, in consultation with SHPO, to be contributing elements, expand the district to encompass an airport landscape.”

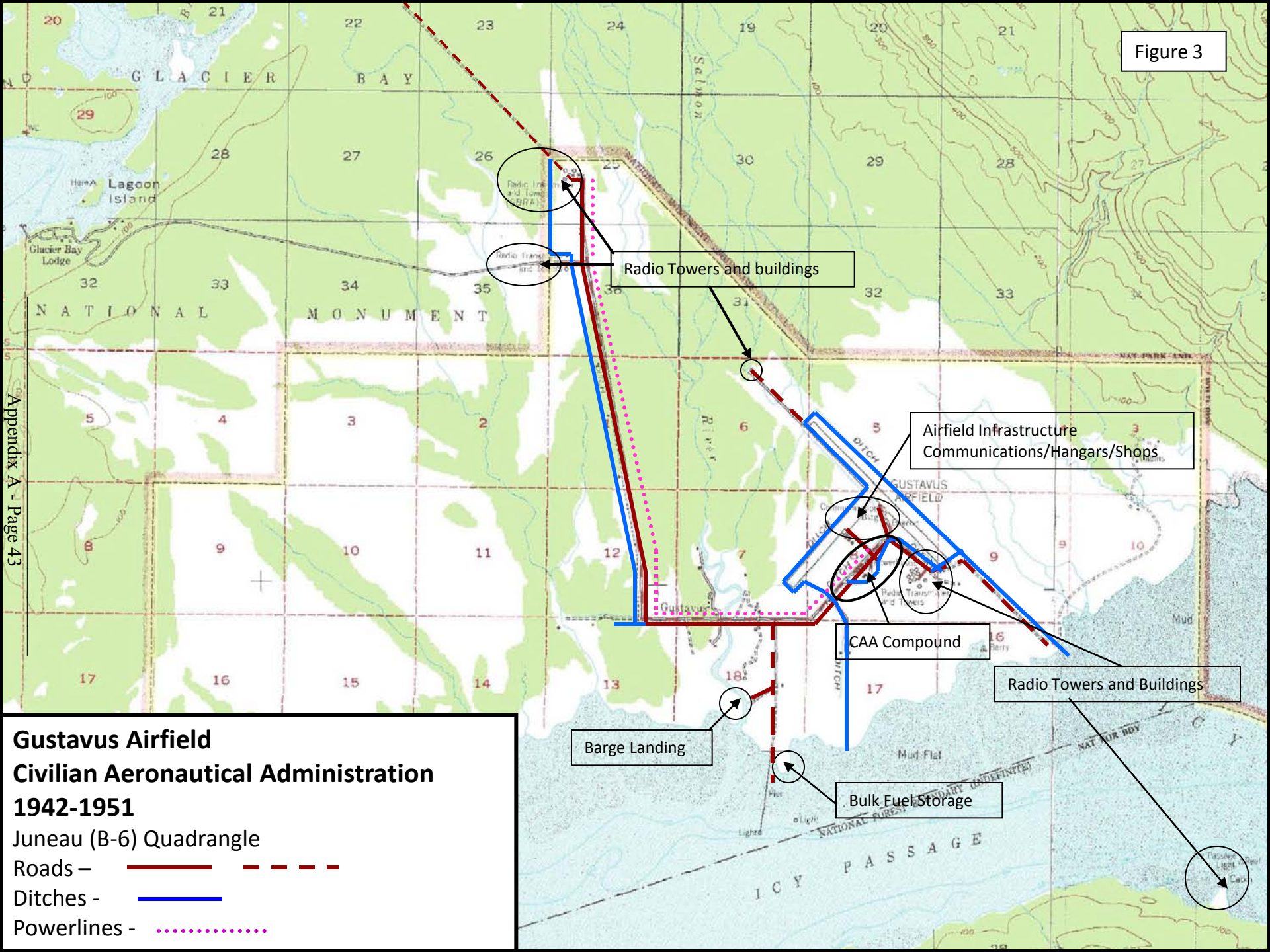
Page 2: [2] Comment [wkh6]

whowell

1/6/2011 5:45:00 PM


On that thought, would it be too much to ask that the DOT contractor produce an executive summary document, with photos, maps, basic history, in glossy format, that would be suitable for sharing with local lodges, businesses, etc.? in essence, a publication, which should be attractive to any contractor and usable by everybody involved. That way the historic landscape can be shared with visitors. The intent here is, rather than produce a report that only a few people will ever look at, this would be a product for public education and enjoyment, and a way for us to interpret and share the history.


Figure 3




Appendix A - Page 43

Gustavus Airfield
Civilian Aeronautical Administration
1942-1951
 Juneau (B-6) Quadrangle

Roads - 

Ditches - 

Powerlines - 

Radio Towers and Buildings

Radio Towers and Buildings

Radio Towers and buildings

Airfield Infrastructure
Communications/Hangars/Shops

CAA Compound

Radio Towers and Buildings

Barge Landing

Bulk Fuel Storage

Radio Towers and Buildings

Laurie's talking points (in bullets)/notes for NPS Teleconference on 1-27-11 at 10:00 regarding NPS (1-18-11) comments on Gustavus Airport RSA draft MOA (project #68287)

Wayne Howell and Michele Jespersen (NPS) 697-2606

Jane Gendron and Al Steininger (DOT&PF) 465-4499

- We want to figure out logistics to wrap up MOA quickly and then circulate it for signature. This is a high priority for SE Region and FAA. Intend after this teleconference to make any necessary revisions for a Final draft and send out for one last quick review indicating this is the version that we will be circulating for signature. FAA will formally transmit the MOA for signature. Assume that Susan Boudreau, Park Superintendent will be signing. Not certain what the City's intentions are as we have not heard back from them on their interest in participating in this MOA.
- Just so you are aware, the stipulations that are in the current MOA were originally recommended by SHPO, and we worked out them out with Judy and Doug in the preliminary draft. What we had forwarded to you is the revised MOA that incorporated all of SHPO's comments.
- Your comments and suggestions expand the mitigation to the more thorough documentation at the airport also include four components:
 - (1) evaluate the broader Gustavus landscape,
 - (2) formally nominate the landscape to the National Register,
 - (3) establish an archival collection of historic materials, and
 - (4) put together a publication for the public.
- We wanted to understand the scope of what you envisioned, as we (FAA and DOT&PF) are looking at mitigation measures to resolve the adverse effect of the historic district at the airport that are commensurate with the scope and scale of our runway safety project.

Wayne Howell stressed that if the Gustavus Airport had not been constructed, the City of Gustavus would not exist, and the park headquarters would be located inside Glacier Bay. The event had permanent and far reaching consequences. He furthered that initially when NPS first evaluated the historic district their focus was in tight and only considered the historic structures owned by NPS at the airport. SHPO asked that we expand it to include the other structures along the main road and that became the Compound District. There was merit to look at all of the inter-related features from this event throughout the broader Gustavus area. Wayne asked about formal nomination submittal to the National Register. I told him that we are required to be in compliance with Section 106 processing which does not require us to do actual nomination submittals.

- Indicate that I spoke with Judy about your comments yesterday as we were concerned over the scope and extent your comments. Her opinion is that we should keep our mitigation at a level that corresponds to the scope and scale of our project, and focus on the airport district. We (and Judy has the same opinion) agree to broaden Stipulation A for the historic context/overview to include a general discussion of the Gustavus cultural landscape with those features that you have already identified so that NPS can tier off our documentation when you conduct your larger landscape evaluation, and include them in the development and review of the Historic Context.
- Indicate for the above reasons that we would not be including archival collection or the publication as MOA mitigation stipulations.

From: patricia.sullivan@faa.gov [mailto:patricia.sullivan@faa.gov]
Sent: Tuesday, February 01, 2011 4:50 PM
To: Wayne ne_Howell@nps.gov
Cc: Bruce.Greenwood@faa.gov; Tripp, Charles M (DOT); Gasek, Douglas F (DNR); Gendron, Jane D (DOT); Mulcahy, Laurie A (DOT); Michele_Jesperson@nps.gov; Yost, Reuben M (DOT); Rickman, Summer L (DNR); Krauthoefer, Tracie A (DNR)
Subject: Re: Gustavus MOA

Wayne,

Thank you for taking the time to review and comment on the initial draft MOA. And for your prompt reply to our request for comment on the revised draft including a detailed explanation below for NPS request to include the broader landscape evaluation. We appreciate you and Michele's comments and will be incorporating a general evaluation of the cultural landscape as noted below.

We will revise the MOA reflect NPS's role as a commentator, rather than an MOA signatory.

Regards,

Patti Sullivan
Environmental Program Manager
Airports Division
Alaskan Region FAA
907-271-5454

From: Wayne ne_Howell@nps.gov
To: Patricia Sullivan/AAL/FAA@FAA
Cc: Bruce Greenwood/AAL/FAA@FAA, "Tripp, Charles M (DOT)" <chuck.tripp@alaska.gov>, "Gasek, Douglas F (DNR)" <doug.gasek@alaska.gov>, jane.gendron@alaska.gov, "Mulcahy, Laurie A (DOT)" <laurie.mulcahy@alaska.gov>, Michele_Jesperson@nps.gov, "Yost, Reuben M (DOT)" <reuben.yost@alaska.gov>, summer.rickman@alaska.gov, tracie.krauthoefer@alaska.gov
Date: 02/01/2011 04:34 PM
Subject: Re: Gustavus MOA

All, it looks like this MOA is moving toward completion after what has been a long process.

However, we would like to clarify several perceptions that seem to have grown out of this process.

First, this is an FAA/DOT undertaking that happens to include a <1-acre parcel of NPS land within the boundary of the APE. Because of that we have been invited to consult and to comment on the draft MOA. However, since this is not an NPS action and none of the proposed project activities will affect the NPS property, either directly or indirectly, we see our agency as a minor participant in this process. With that in mind, and having reviewed the Signatories section of 36 CFR 8006. (c)(1)(i), NPS has decided that since it has no responsibilities in this undertaking, we ask not to be a signatory or an invited signatory or even a concurring party to this MOA. We view our role as that of commenter, nothing more.

Also, we need to correct a perception, as reflected in the statement - "so that NPS can tier off our documentation when NPS conducts a larger landscape evaluation". For clarification, NPS has no plans to conduct a larger landscape evaluation of a potential Gustavus Airfield cultural landscape. For context, the Gustavus Airport is a 1,697 acre property owned entirely by DOT, of which about 306 acres is located within the security fence, an area which encompasses both runways and with adjoining roads, ditches and building is the core area of the historic district. Adjoining the DOT boundary, the NPS property is just under an acre in size, or less than 1/300th of the core area. Furthermore, radiating out from this core airfield area are the prominent linear features which define the footprint of the CAA-era development in Gustavus - the roads, ditches and powerline. All three of these linear features, when they extend out from the airfield, follow DOT owned easements. These easements, which range from 60-100 feet wide, total about 6.4 miles in length and encompass another 50 or so acres of historic features. Since the roads and ditches were identified as contributing elements within the APE, it reasons that they retain that same significance when they exit the core area. However, they are DOT owned historic features, so are that agencies' responsibility to inventory and manage. They all terminate before reaching the NPS boundary, so are entirely outside our agencies' jurisdiction and responsibility. NPS, owner of <1 acre, therefore has no plan to conduct a 'larger landscape evaluation' on this >1750 acre DOT owned landscape.

Our comments to the draft MOA were based on the logic that since this is a DOT undertaking, and, with the exception of the runways, all of the contributing cultural elements identified within the project area extend uninterrupted outside the APE, this is an opportunity for DOT to hire a consultant to document its entire cultural landscape. Such a contract would be but a fraction of this \$15,000,000 project cost. NPS was able to do a rudimentary study to support our determination of eligibility when we rehabilitated the 4 structures in our CAA compound, and that work was expanded by the DOT consultant for this project, but more work needs to be done. As our prior studies and comments have shown, Gustavus owes its very existence to the building of the Gustavus Airfield during WWII, and, as an 'airport town', what better time to capture that history and share it with the public than within the context of what must surely be the largest publicly funded project since the airfield was first built? And what better agency to do it than the airport owner and operator? That was the context of our comments, which FAA/DOT can take into consideration, or not. However your agencies decide to proceed, know that our historic archives are available for research, and our staff with specific knowledge of features and locations are available to assist your consultants however we can.

If the lead agencies, FAA/DOT, in consultation with SHPO, and desiring to keep the MOA commensurate with the scope of the undertaking, are not in agreement with the NPS comments to the draft MOA, by all means, please disregard them. We expressed that sentiment during the teleconference on January 27, and reiterate it here. We would be comfortable with this approach, since the project will have no effects to the NPS property.

Regards,

Wayne Howell
Michele Jespersion

Wayne Howell
Management Assistant
Glacier Bay National Park
P.O. Box 140
Gustavus, Alaska 99826
(907)697-2662
FAX (907)697-2654

patricia.sullivan
@faa.gov

01/31/2011 03:58 PM <doug.gasek@alaska.gov>, "Gasek, Douglas F (DNR)"
summer.rickman@alaska.gov,
tracie.krauthoefer@alaska.gov,
Michele_Jesperson@nps.gov,
wayne_howell@nps.gov

To

cc

"Mulcahy, Laurie A (DOT)"
<laurie.mulcahy@alaska.gov>,
jane.gendron@alaska.gov, "Yost,
Reuben M (DOT)"
<reuben.yost@alaska.gov>, "Tripp,
Charles M (DOT)"
<chuck.tripp@alaska.gov>,
Bruce.Greenwood@faa.gov

Subject

Gustavus MOA

Greetings,

Attached is the MOA for the Gustavus Airport.

This version of the MOA has been revised to address comments received from the SHPO and NPS. Please note that the MOA version provided to NPS for comments incorporated the comments received from the SHPO's office early January. The highlighted text in the attached MOA reflects comments/ edits provided by NPS and refinements made to reflect what FAA and DOTPF are proposing to address NPS comments and keep the scope of the mitigation to what is commensurate with the affects of FAA and DOTPF's proposed action.

NPS requested that the scope of the mitigation be expanded to encompass amongst other things a detailed landscape evaluation. As discussed in a phone meeting between DOTPF and NPS last week, FAA and DOTPF agree to broaden Stipulation A for the historic context/overview to include a general discussion of the Gustavus cultural landscape with those features that have already been identified so that NPS can tier off our documentation when NPS conducts a larger landscape evaluation, and include them in the development and review of the Historic Context.

FAA intends to circulate the MOA for signature this Friday February 4th. Please reply to this email no later than noon on Thursday February 3rd if you have any outstanding concerns with the MOA.

Regards,

Patti Sullivan
Environmental Program Manager
Airports Division
Alaskan Region FAA

907-271-5454(See attached file: Gustavus Airport MOA 1-28-11_V3.doc)[attachment "Gustavus Airport MOA 1-28-11_V3.doc" deleted by Patricia Sullivan/AAL/FAA]

**Memorandum of Agreement
between the
Federal Aviation Administration
and the Alaska State Historic Preservation Officer
Regarding the Gustavus Airport Runway Safety Area
Improvement Project at Gustavus, Alaska
State Project No. 68287**

WHEREAS, the Federal Aviation Administration (FAA) Alaskan Region Airports Division, in cooperation with the Alaska Department of Transportation and Public Facilities (DOT&PF) Southeast Region, an applicant for federal assistance, proposes to expand the runway safety area at the Gustavus Airport to resolve operational deficiencies and to meet current FAA standards (undertaking); and

WHEREAS, FAA has determined that the Gustavus Airfield Historic District (JUN-1093) is eligible for the National Register of Historic Places (NRHP), and that the Civilian Aeronautics Administration (CAA) Gustavus Compound Historic District (JUN-1047), the Airfield Runways (JUN-1094), the Airfield Roads (JUN-1095), and the Airfield Ditches (JUN-1096) are contributing properties; and

WHEREAS, the National Park Service (NPS) previously determined the CAA Gustavus Compound Historic District eligible for the NRHP and recognized the potential of a Gustavus Airfield cultural landscape; and

WHEREAS, FAA has determined that the undertaking will have an adverse effect on the Gustavus Airfield Historic District; and

WHEREAS, FAA consulted with Alaska State Historic Preservation Officer (SHPO) in accordance with Section 106 of the National Historic Preservation Act (NHPA) (U.S.C. 470s) and 36 CFR 800; and

WHEREAS, FAA has invited the Advisory Council on Historic Preservation (Advisory Council) to participate and they have declined to participate; and

WHEREAS, FAA consulted with NPS and the City of Gustavus, pursuant to 36 CFR 800; and

WHEREAS, FAA invited NPS and the City of Gustavus to participate and they have declined to participate; and

WHEREAS, FAA consulted with the Central Council of Tlingit and Haida Tribes of Alaska, the Hoonah Indian Association, the Huna Totem Corporation, the Sealaska Corporation pursuant to 36 CFR Section 800.2(c)(2); and

WHEREAS, DOT&PF as project sponsor participated in consultation pursuant to 36

CFR 800 and is signing this agreement as an Invited Signatory in this MOA; DOT&PF shall be responsible to administer and implement the stipulations under the terms of the MOA for and as directed by FAA; and

NOW, THEREFORE, FAA, SHPO, and DOT&PF (collectively the “Signatories”) agree that the undertaking shall be implemented in accordance with the following stipulations in consideration of the effects this undertaking will have on the Gustavus Airfield Historic District.

STIPULATIONS

The FAA in coordination with DOT&PF shall ensure that the following stipulations are implemented:

A. Historic Context and Evaluation

1. The DOT&PF shall develop a report containing a more thorough historic context and evaluation of the Gustavus Airfield Historic District. The report will document additional research conducted to establish a comprehensive basis to understand the significance of the District, its contributing features, and the influence of this historic event on the eventual development of Gustavus and Glacier Bay National Park. It will include:
 - a. Historic Overview. Additional information on the period of significance, particularly the extent of World War II and CAA construction and use of the airport, and the effects of airport construction on the eventual development of Gustavus and Glacier Bay National Park. This will also discuss and provide the basis for a potential Gustavus Airfield cultural landscape and associated features in the broader Gustavus area.
 - b. A more thorough identification and description of character-defining features of the District, a listing of original features that have been destroyed or altered, and an evaluation of integrity of the contributing elements.
 - c. A graphic depiction showing the proposed boundary of the historic district and contributing elements.
2. The DOT&PF, with oversight from FAA, will develop the Historic Context and Evaluation in consultation with SHPO.
 - a. The DOT&PF shall submit a Historic Context and Evaluation outline to SHPO and NPS for review.
 - b. The SHPO shall provide DOT&PF with review comments no later than thirty (30) days after receipt of the documentation.
 - c. The DOT&PF shall take into account comments received during the review period.
3. The DOT&PF, with oversight from FAA, shall ensure that the draft report is submitted to SHPO and NPS for comment and verification of completion within two (2) years after signing this Agreement.

- a. The SHPO shall provide DOT&PF with review comments no later than thirty (30) days after receipt of the documentation.
 - b. The DOT&PF shall take into account comments received during the review period.
 - c. The final report shall be submitted to SHPO and NPS within two (2) months of the receipt of the draft comments.
4. The report shall meet contemporary professional standards and follow the Alaska Office of History and Archaeology (OHA) Standards and Guidelines for Investigating and Reporting Archaeological and Historical Properties in Alaska (Historic Preservation "Series #11) and the Secretary of the Interior's Standards and Guidelines for reports (48 FR 44734-44737).

B. Professional Standards

All work pursuant to this MOA shall be developed by or under the supervision of a person or persons who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards in architectural history (Federal Register Vol. 62, No.119, pp. 33719).

C. Treatment of Human Remains

1. Although unlikely to be encountered, any and all human remains shall at all times be treated with dignity and respect. Should human remains be encountered, work will be stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify the Alaska State Troopers (AST), FAA, and SHPO. If the human remains are determined or believed by investigators to be Native, local Tribes shall be notified immediately. See Appendix A for specific contact information for Agency and Tribal Officials involved with human remains consultation.
2. If the remains appear recent, FAA and DOT&PF shall defer to the opinion of AST and/or the State Medical Examiner (SME) for a determination of whether the remains are of a forensic nature and/or subject to criminal investigation.
3. A physical anthropologist experienced in the analysis of human remains shall examine the human remains to determine racial identity. The physical anthropologist shall document, analyze, and photograph the remains so that an independent assessment of racial identity can be made. The physical anthropologist shall be afforded no more than thirty (30) days time to conduct his or her analysis.
4. If the human remains are not Native American, and a determination has been made by AST and SME that a death investigation is not warranted, then FAA and DOT&PF in consultation with SME, will identify, locate and inform descendants of the deceased. If no descendants are found, any necessary permits from the

Alaska State Bureau of Vital Statistics will be obtained and the remains re-interred in a designated area.

5. Should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001) be encountered, work shall be stopped at once in the locality to prevent further disturbance and DOT&PF shall immediately notify FAA, SHPO, and the Hoonah Indian Association.
6. Although the project does not involve lands currently owned by the NPS, should any associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by NAGPRA (25 U.S.C. 3001) be encountered on lands owned by the NPS at the time of the discovery, the requirements of NAGPRA, as outlined in 43 CFR 10, shall apply.

D. Inadvertent Discoveries

If, during the implementation of the undertaking, a previously unidentified historic property is encountered, or a previously identified historic property is affected in an unanticipated manner, DOT&PF shall consult with FAA, SHPO, the Hoonah Indian Association, ANCSA Corporations, and other consulting parties as appropriate pursuant to 36 CFR 800.13. The DOT&PF will ensure that work shall cease in the area of the discovery until the previously unidentified historic property or unanticipated effect can be evaluated, and an appropriate treatment plan consistent with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716) is developed and agreed upon by SHPO. The DOT&PF shall insure that the treatment plan is implemented.

E. Review

The Signatories shall review this MOA two (2) years from its execution date and every year thereafter until all measures are completed or until four (4) years from its execution date. The DOT&PF shall submit a biannual letter status update to MOA Signatories one (1) month prior to the biannual review and annually thereafter. Any amendments to this MOA recommended during the review shall be considered in accordance with CFR 800.6(c)(7). If the review results in a recommendation to terminate the MOA, termination of the MOA shall be considered in accordance with 36 CFR 800.6(c)(8).

F. Dispute Resolution

1. Should any Signatory to this MOA object in writing to the other Signatories regarding any action carried out or proposed with respect to the implementation of this MOA, consultation among the signatories shall be initiated to resolve the objections.

2. If FAA determines that the Section 106 related objection cannot be resolved through consultation, it shall request the further comments or staff level recommendations from ACHP pursuant to 36 CFR 800.6(b). Any ACHP comment provided in response to such a request will be taken into account by FAA in accordance with 36 CFR 800.6(c)(2).
3. At any time during implementation of any stipulation in this MOA, should an objection to any such stipulation or its manner of implementation be raised by a member of the public, FAA shall take the objection into account and consult as needed with the objecting party and parties to this agreement to address the objection.

G. Amendment

Any Signatory to this agreement may request that this MOA be amended, whereupon they shall consult in accordance with 36 CFR § 800.6(c)(7) to consider such amendment. Amendments shall be executed in the same manner as the original MOA.

H. Duration

This MOA shall continue in full force and effect until all measures for are completed or until four (4) years from its execution date. At any time DOT&PF may request FAA and SHPO in writing to review DOT&PF's project schedule and consider an extension or modification of this MOA. No extension or modification shall be effective unless all Signatories to the MOA have agreed to it in writing.

I. Termination

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

Execution and Implementation of this Memorandum of Agreement evidences that FAA has consulted with the SHPO and NPS on the Gustavus Runway Safety Area Improvement Project and its effects on historic properties, and has taken into account the undertaking's effects on historic properties, and satisfied Section 106 responsibilities.

SIGNATORIES:

FEDERAL AVIATION ADMINISTRATION

By: *Patricia Sullivan*
for Byron Huffman, Alaskan Region Airports Division Manager

Date: Feb 3, 2011

ALASKA STATE HISTORIC PRESERVATION OFFICER

By: *Judith Bittner*
Judith Bittner, State Historic Preservation Officer

Date: 2-11-2011

INVITED SIGNATORY:

ALASKA DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES

By: *Gary Davis*
Gary Davis, Southeast Regional Director

Date: 2-7-2011