



U.S. Department  
of Transportation

Alaskan Region Airports Division

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**Federal Aviation  
Administration**

AUG 26 2014

In Reply Refer To:  
55829

Mr. D. Tyrell McGirt  
Unalaska Historic Preservation Commission  
City of Unalaska  
P.O. Box 610  
Unalaska, Alaska 99685-0610

**RE: Finding of Adverse Effect and Agency Scoping Letter**

Dear Mr. McGirt:

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Aviation Administration (FAA), is proposing to mitigate safety risks by demolishing the Torpedo Bombsight and Utility Shop (Torpedo Building) at the Unalaska Airport. The Unalaska Airport is located on Amaknak Island in the Aleutians, about 800 miles from Anchorage: Section 34, Township 72 S, Range 17 W, Seward Meridian, USGS Quad Unalaska C-2 (Figure 1).

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 by the proposed project. This letter also serves as the agency scoping letter to identify other sensitive environmental resources in the project area.

**Building Context and Condition**

The Torpedo Building is a contributing element to the Dutch Harbor Naval Operating Base & Fort Mears National Historic Landmark (NHL)(UNL-00120). According to the 2004 *Historic Investigation and Preservation Alternatives Report for the Torpedo Building*, the building was constructed and operational during the campaign against the Japanese attacks on the Aleutian Islands. It is one of two remaining structures in the state designed by internationally-renowned architect Albert Kahn.

A structural assessment in 2003 found that the building's structural frame and foundation were sound yet the exterior, roof, and sheathing were a safety hazard due to deterioration and flying debris. There is a documented history of debris flying off the building during incidents of severe weather. During a windstorm on February 7, 2014, large pieces of lumber and debris flew off the building into cars parked in an adjacent parking lot (Photo Sheet).

The soil and groundwater on site at the Torpedo Building (Hazard ID 1328) is contaminated by diesel-range petroleum hydrocarbons and concrete floor contains leachable lead (source: Alaska

Department of Environmental Conservation [ADEC] *Contaminated Sites Database* website, August 18, 2014). In 2001 a large amount of contaminated sediment was removed from the site. The 2003 structural assessment also found that the exterior walls and siding are made from asbestos-coated metal. At the time of the report, the siding material was in poor condition and was worn down to the asbestos paper on the exterior of the walls. The 2001 clean-up did not abate hazardous building materials such as the asbestos and lead paint.

In June 2014, DOT&PF contracted the services of a Structural Engineer to assess the current condition of the Torpedo Building. The structural assessment indicated that the building's structural system was significantly corroded and will likely experience "failure of some of the major structural components" in the near future. A copy of the survey is available upon request.

### **Project Description**

Work associated with the removal of the Torpedo Building would consist of the following:

- Abatement of hazardous materials including asbestos and lead based paint
- Removal of all building contents except the concrete floor, foundation and underground utilities (This includes the roof, exterior sheathing, structural frame, pipes, electrical apparatuses, and other building components)
- Removal of concrete walls down to the finish floor grade
- Fill of any voids below finish floor grade to make the floor level
- Removal of all debris from the lot

### **Area of Potential Effect**

The Direct Area of Potential Effect (APE) consists of the boundary of the lot the Torpedo Building is on (Figure 2). This includes the building and the area around the building where debris would be removed. The Indirect APE consists of the buildings within viewshed of the Torpedo Building.

### **Previous Consultations**

In February 2014, DOT&PF consulted with the Alaska Office of History and Archeology (OHA) on a state-funded project to remove the building due to the safety risks. At the time it was anticipated that FAA would not be involved in the undertaking. It was determined that the demolition of the Torpedo Building would have an adverse effect on Torpedo Building and the NHL. In cooperation with OHA and consulting parties, DOT&PF developed a Memorandum of Agreement (MOA) to mitigate adverse impacts on the NHL from the demolition of the torpedo building. Before the MOA could be signed it was determined that the proposed project is a Federal action, constitutes and undertaking as defined in 36 CFR 8020.16(y) and further consultation under Section 106 was required.

### **Finding of Effect**

Due to the current condition of the building and the safety risk it causes, DOT&PF has determined that the only prudent and feasible alternative is to demolish the Torpedo Building. Demolition of the Torpedo Building would result in an adverse effect to a contributing element of the Dutch Harbor Naval Operating Base & Fort Mears NHL.

## **Other Resource Impacts**

### Section 4(f)

Under Section 4(f) of the Department of Transportation Act of 1966, currently codified as 49 USC Section 303(c), the project would constitute a use because the proposed project permanently incorporates the Torpedo Building, a portion of an NHL. The DOT&PF, in cooperation with the FAA, will conduct an Individual Section 4(f) Evaluation to show that no other prudent and feasible alternative exists and that all possible planning to minimize harm has been incorporated into the project. Planning to minimize harm will include the development of an MOA to mitigate the adverse impacts on the NHL.

### Hazardous Materials

Due to the contamination of the concrete, groundwater, and building materials, an ADEC approved work plan would be developed and implemented during construction. All contaminated hazardous material and solid waste generated during construction would be disposed of in accordance with state and federal regulations.

## **Section 106 Consulting Parties**

We are contacting the Section 106 consulting parties (State Historic Preservation Office, NPS, Unalaska Historic Preservation Commission, Qawalangin Tribe, and the Ounalashka Corporation) to determine their interest in participating in consultation for the resolution of the adverse effects and in the development of the MOA. It is anticipated that the MOA will be in-kind to the one developed previously by DOT&PF and the consulting parties. All mitigation measures and comments received from consulting parties will be incorporated into the new MOA.

## **Agency Scoping**

The FAA is preparing an Environmental Assessment for the proposed project. To ensure that all factors are considered in developing the proposed project, please provide written comments, recommendations, and the additional requested information to our office no later than September 30, 2014.

Please direct your concurrence or comments to the address above, by telephone at 907-271-5453 or by e-mail at [leslie.grey@faa.gov](mailto:leslie.grey@faa.gov).

Sincerely,



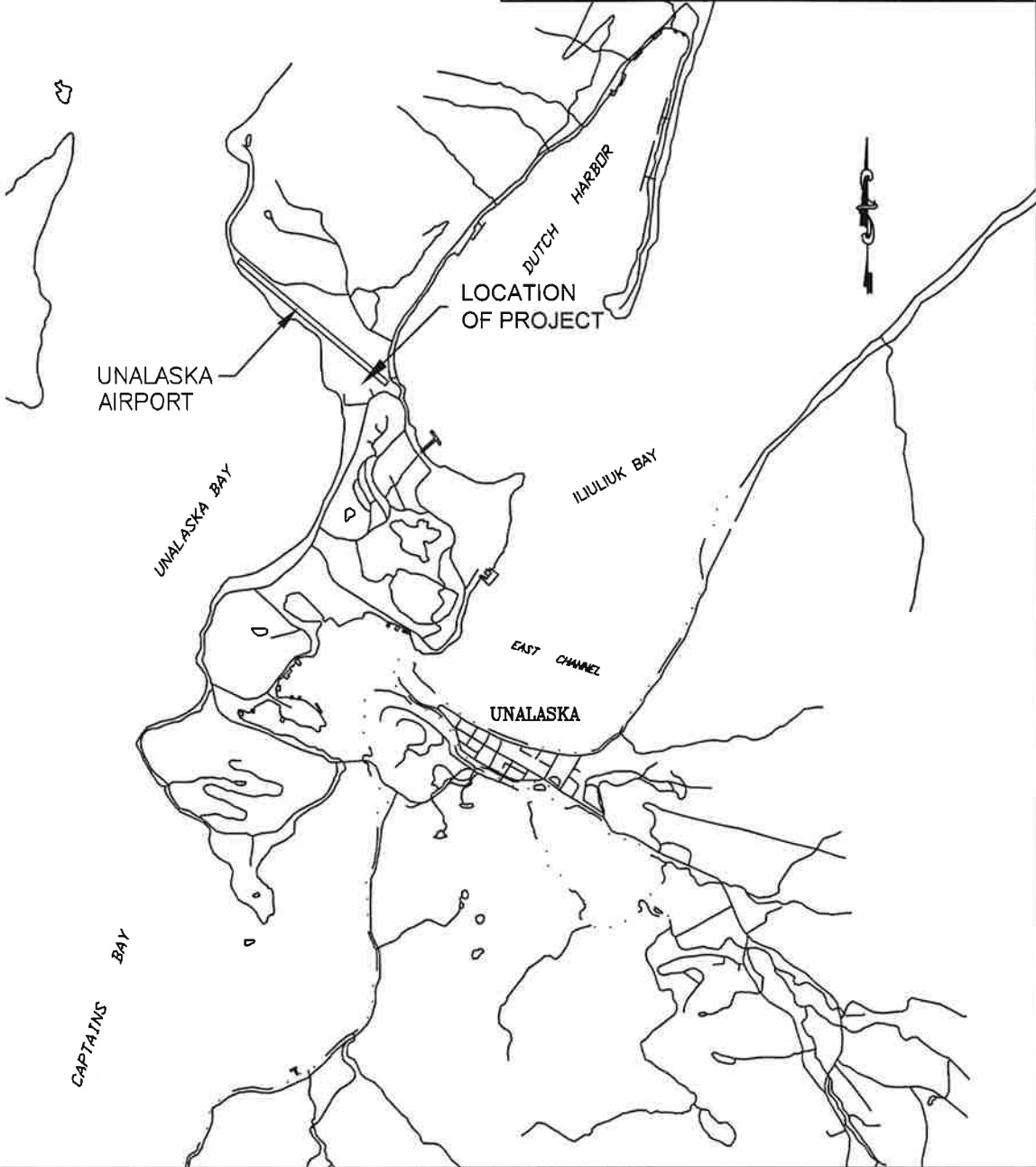
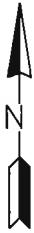
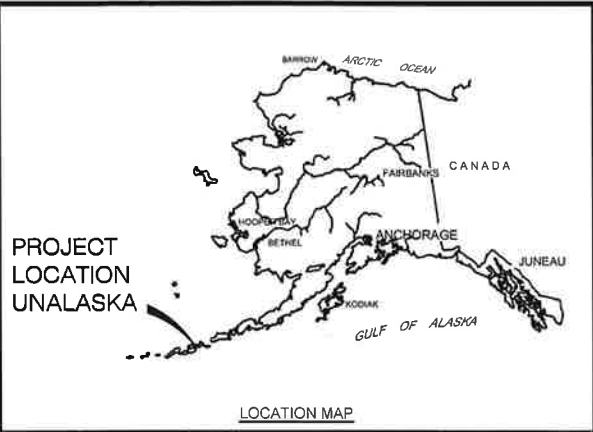
Leslie Grey  
Lead Environmental Protection Specialist

Enclosures:

- Figure 1: Location and Vicinity Map
- Photo Sheet
- Figure 2: APE

cc w/o enclosures:

Aaron Hughes, P.E., Project Manager, Aviation Design, DOT&PF CR  
Brian Elliott, Regional Environmental Manager, PD&E, DOT&PF CR  
TaraLyn Stone, Environmental Protection Specialist, FAA  
Valerie Gomez, Cultural Resource Specialist, DOT&PF CR



<p><b>STATE OF ALASKA</b> DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES</p>	<p>SCALE: NTS</p>	<p><b>UNALASKA AIRPORT SAFETY IMPROVEMENT PROJECT</b> PROJECT NO. 55829 LOCATION &amp; VICINITY MAP UNALASKA, ALASKA</p>	<p><b>FIGURE 1</b></p>
<p>PRELIMINARY DESIGN AND ENVIRONMENTAL GROUP</p>	<p>DATE: 8/21/2014 BY: K. SHEA</p>		

Photo Sheet  
Unalaska Torpedo Building







756 ft

TORPEDO BOMBSIGHT  
AND UTILITY SHOP

30

<p>STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES</p>	<p>SCALE: NTS</p>	<p><b>UNALASKA AIRPORT SAFETY IMPROVEMENT PROJECT</b> PROJECT NO. 55829 AREA OF POTENTIAL EFFECT UNALASKA, ALASKA</p>	<p>FIGURE 2</p>
<p>PRELIMINARY DESIGN AND ENVIRONMENTAL GROUP</p>	<p>DATE: 8/21/14</p>		
	<p>BY: K. SHEA</p>		