



EXECUTIVE OFFICES | [searhc.org](http://searhc.org)  
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**August 16, 2021**  
*Via U.S. Mail*

Dr. Michael Johnson, Commissioner  
State of Alaska, Dept. of Education & Early Development  
P.O. Box 110500  
Juneau, AK 99811-1020

Dear Commissioner Johnson,

SouthEast Alaska Regional Health Consortium (SEARHC) submits the following comments in regard to Japonski Island Lot 15A Negotiated Sale – Preliminary Decision. Conveyance of Japonski Island Lot 15A is not in the best interest of the people of Sitka or the State of Alaska.

The proposed conveyed lands are adjacent to SEARHC Mt. Edgecumbe Medical Center (MEMC) and associated facilities. MEMC is a 25-bed critical access hospital with a broad range of medical specialties and primary care services (in close partnership with Alaska's other health facilities) to support a comprehensive spectrum of healthcare and related services.

In FY 2020, SEARHC logged 189,836 outpatient visits organization-wide, which include visits to our family and general practice, nursing clinics, behavioral health clinics, emergency department, telemedicine, radiology, rehabilitation and optometry services, nutrition, social services and specialty and surgery clinics. In 2020, 107 babies were born at Mt. Edgecumbe Medical Center. Going forward, we anticipate delivering care to approximately 18,000 Alaska Native beneficiaries throughout the region at Mt. Edgecumbe Medical Center. The Emergency Department at MEMC is a Level IV Trauma Center staffed 24 hours a day, seven days a week by board-certified physicians, physician assistants, nurse practitioners and registered nurses who specialize in care for patients with serious illnesses and injuries.

And, in a joint venture partnership with the Indian Health Service, SEARHC is in the process of developing a replacement facility for MEMC's aging infrastructure—including through the receipt of several parcels of federal land through federal legislation. These parcels, located at the end of Seward Avenue, were transferred to the Bureau of Indian Affairs and designated by an act of the United States Congress for educational and healthcare purposes. The Seward Avenue properties are national landmark properties and regulated by federal preservation laws.

The proposed conveyance is in support of a proposed project to build a seaplane base immediately adjacent to the new hospital facilities, creating a major increase in noise and interfering with the patient care and educational uses of the adjacent parcels, as well as significantly interfering with the single access route to SEARHC's hospital and emergency room. All activity associated with the proposed conveyance will also impact Behavioral Health counseling facilities and be in the near vicinity of a residential treatment facility for youth. There is a long list of concerns associated with the nature of those programs and access to commercial activities.

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The planning process for this project has manifestly failed to address these concerns. The City and Borough of Sitka did produce—through their contract engineers for the Project—studies on noise and traffic impacts, but these studies conveniently sidestepped the real concerns and appeared to be nothing more than box-checking exercises. For example, the noise study addressed only noise associated with the flight path in Sitka Channel, not noise associated with operations at the seaplane base proposed to be adjacent to SEARHC’s facilities. Similarly, the traffic study only addressed passenger and light vehicle traffic, and did not consider the effects of trailers hauling aircraft (or other large commercial vehicles) on access for emergency vehicles such as ambulances.

The City and Borough of Sitka’s proposed float plane base site selection for Seward Avenue was first selected in 2000 and reaffirmed in 2016. All of this was prior to SEARHC’s venture to provide a new community hospital and nursing home on Seward and Tongass Avenue, adjacent to the proposed site. The proposed conveyance does not appear to recognize the need for increased healthcare services in the community and progress underway on the new facility.

To date, SEARHC has not been officially approached by the Department of Education and Early Development as to the impacts of the proposed conveyance on any of a number its health care programs. These programs would be negatively affected by the conveyance, which is not in the best interest of the State of Alaska.

If you have any questions regarding these comments, contact SEARHC Facilities Director Greg McIntyre at 907.966.8850 or [gmcint@searhc.org](mailto:gmcint@searhc.org).

Sincerely,

DocuSigned by:  


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Charles Clement  
President and Chief Executive Officer