

**MEMORANDUM OF AGREEMENT
BETWEEN COMMANDER, NAVY REGION NORTHWEST
AND THE
WASHINGTON STATE HISTORIC PRESERVATION OFFICER
REGARDING THE BREMERTON WATERFRONT INFRASTRUCTURE
IMPROVEMENTS AT PUGET SOUND NAVY SHIPYARD AND INTERMEDIATE
MAINTENANCE FACILITY, NAVAL BASE KITSAP-BREMERTON, WASHINGTON**

WHEREAS, in February 2018, the Secretary of the Navy established the Shipyard Infrastructure Optimization Program (SIOP), a comprehensive approach to address facility, equipment, and performance improvements to ensure that Naval shipyards are meeting the United States (U.S.) Naval Fleet's needs; and

WHEREAS, Department of Navy (Navy) acting through Commander, Navy Region Northwest (CNRNW), Program Management Office 555 (PMO 555), Naval Base Kitsap (NBK)-Bangor and Puget Sound Naval Shipyard & Intermediate Maintenance Facility (PSNS & IMF) (hereinafter collectively referred to as the "Navy") propose waterfront infrastructure improvements at PSNS & IMF, to include the construction of a new Multi-Mission Dry Dock at NBK-Bremerton; modification or demolition of existing facilities and the construction of new facilities at NBK-Bremerton and NBK-Bangor; and compensatory mitigation improvements, pursuant to the Clean Water Act, at NBK-Keyport, NBK-Jackson Park, and Evergreen Rotary Park in Bremerton (hereinafter the "Undertaking"); and

WHEREAS, the Navy has determined that the proposed project constitutes an Undertaking that has the potential to cause effects on historic properties and is subject to review under Section 106 of the National Historic Preservation Act (NHPA) 54 United States Code (U.S.C.) section 306108, and its implementing regulations, 36 Code of Federal Regulations (CFR) part 800; and

WHEREAS, the Navy has defined the Undertaking's area of potential effects (APE) pursuant to 36 CFR part 800.16(d) and as depicted in Appendix A; and

WHEREAS, the Navy has determined that the Undertaking will have an adverse effect on the Navy Yard Puget Sound National Historic Landmark (NYPS NHL), designated by the Secretary of the Interior in 1992 under NHL Criterion 1 and concurrently listed in the National Register of Historic Places (NRHP) at the national level of significance under Criterion A for its association with American military history; and

WHEREAS, the Navy has determined that the Undertaking will have an adverse effect on the PSNS & IMF Historic District, which is eligible for listing in the NRHP at the state level of significance primarily under Criterion A for its association with naval industry and technology and Criterion C as a significant collection of shipyard architecture and engineering; and

WHEREAS, the Navy has consulted with the Washington State Historic Preservation Officer (SHPO) pursuant to 36 CFR part 800; and

WHEREAS, on 6 August 2025, the Navy notified the National Park Service (NPS), as delegated by the Secretary of the Interior, of its adverse effect determination. The NPS chose to participate pursuant to 36 CFR part 800.10(c) and has been invited by the Navy to sign as a concurring party; and

WHEREAS, the Navy notified the Suquamish Tribe of the Port Madison Reservation, Port Gamble S'Klallam Tribe, Jamestown S'Klallam Tribe, Skokomish Indian Tribe, and the Lower Elwha Klallam Tribe of its adverse effect determination and invited them to participate as consulting parties. The Suquamish Tribe of the Port Madison Reservation chose to participate pursuant to 36 CFR part 800.2(c) and has been invited by the Navy to sign as a concurring party; and

WHEREAS, the Navy notified the USS Turner-Joy Bremerton Historic Ships Association, Port of Bremerton, Washington State Historical Society, Downtown Bremerton Association, Washington State Ferries, Kitsap County, Kitsap Transit, Manette Neighborhood Coalition, City of Port Orchard, Greater Kitsap Chamber, Kitsap Historical Society, Museum of Science and Industry, Naval History and Heritage Command (NHHC), Puget Sound Navy Museum (PSNM), Washington Trust for Historic Preservation, Port Orchard Bay Street Association, City of Bremerton, USS Turner-Joy, Washington State Historical Society, and Naval Undersea Museum of its adverse effect determination and invited them to participate as consulting parties.

WHEREAS, the NHHC, PSNM, City of Bremerton, Port of Bremerton, and Kitsap Transit chose to participate pursuant to 36 CFR part 800.2(c) and have been invited by the Navy to sign as concurring parties; however, the refusal of any consulting party to sign this MOA or otherwise concur does not invalidate or affect the effective date of this MOA; and

WHEREAS, the Navy utilized the public comment period, open from July 18 to September 3, 2025, and open house meeting, held on August 7, 2025, for the Draft Environmental Impact Statement, to satisfy the public involvement requirements of Section 106 of the NHPA pursuant to 36 CFR 800.2(d)(3); and

WHEREAS, the Navy has also coordinated public participation for this Memorandum of Agreement (MOA) through a public review and comment period, and [#] comments were received; and

WHEREAS, in accordance with 36 CFR part 800.6(a)(1), the Navy has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen *not* to participate in the consultation pursuant to 36 CFR part 800.6(a)(1)(iii); and

NOW, THEREFORE, the Navy and the SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The Navy shall ensure that the following measures are carried out:

I. MEASURES TO RESOLVE ADVERSE EFFECTS

A. Avoidance and Minimization Measures. The Navy shall ensure that Navy Cultural Resources (CR) personnel are notified prior to the commencement of the Undertaking to facilitate the following:

1. Preconstruction meetings: Provide a brief to construction personnel about cultural resources and Stipulation III Post-Review Discoveries.
2. Design reviews: Review project plans and provide guidance for new construction in the NYPS NHL and PSNS & IMF Historic District. This review shall be conducted by CR personnel who meet the Secretary of the Interior's Professional Qualifications Standards for Architectural History (36 CFR part 61).
3. Recommend the retention of intact track sections or segments of the rail system as cultural landscape features of the PSNS & IMF Historic District, where practicable and provided that retention does not interfere with mission requirements.
4. Project Coordination: Review any variations from approved plans or project schedule during project execution. This includes timeline shifts that accelerate demolition, the removal of any historic objects, or design changes that do not conform to the Design Guidelines for New Construction¹ that have been prepared for the project.

B. Mitigation Measures and Funding Assurance.

1. The Navy shall execute funding transfer to NHHHC/PSNM prior to commencement of work to cover costs associated with design, fabrication, and installation of exhibits and oral histories discussed herein.
2. The Navy shall ensure the following mitigation measures are carried out. The Navy shall provide all signatories and concurring parties with the opportunity to review and comment on mitigation products in accordance with the milestones and review periods specified in the tables below.

a. **Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) Documentation**

The Navy shall complete HABS/HAER on-site documentation of the facilities identified in Appendix B. Documentation will be completed in accordance with the specified level of documentation in Appendix B.

¹ AECOM 2022. Shipyard Infrastructure Optimization Program: AS14 Cultural Resources and Historic Building/Sites/Asset Study. Appendix J: Preliminary Design Guidelines for New Construction.

Milestone	# Months after MOA Execution	Review/Notification
Photography draft	Prior to facility demolition	SHPO and NPS: 15-day review
Documentation draft	Prior to facility demolition	SHPO and NPS: 45-day review
Project complete	Ongoing throughout duration	Signatories and Concurring Parties: Notice of completion

b. Plan File Digitization

The Navy shall scan and digitally archive plans for all facilities identified in Appendix B:

- i. This effort will include historic engineering and architectural plans maintained on microfiche, microfilm, aperture cards, photographic slides, original paper formats, and other formats.
- ii. All scanning and digital file creation will meet HABS/HAER documentation standards.

Milestone	# Months after MOA Execution	Review/Notification
Project complete	24	Signatories and Concurring Parties: Notice of completion

c. Interpretive Displays

To promote public awareness of the history and legacy of the affected facilities, the Navy shall develop, fabricate and deliver five interpretive outdoor panels:

- i. Content will address PSNS & IMF's historic significance, specifically its contribution to events and broad patterns of national and military history, and its innovations in naval industry and engineering technology. These themes will be contextualized within the broader history of PSNS & IMF and its legacy in the community.

- ii. Upon delivery of the interpretive panels to the City of Bremerton, the City will assume responsibility and costs for installation and maintenance.
- iii. The City of Bremerton will notify Navy CR personnel of the intended locations of the interpretive panels.

Milestone	# Months after MOA Execution	Review/Notification
Draft content/design	12	Signatories and Concurring Parties: 30-day review
Project complete	36	Signatories and Concurring Parties: Notice of completion

d. Museum Exhibit at the Puget Sound Navy Museum (PSNM):

- i. *Permanent Exhibit:* Fund and facilitate the development of a professional permanent museum exhibit dedicated to the historical and technical evolution of PSNS & IMF in accordance with Appendix C.
- ii. *Temporary Exhibits:* Fund the development of two temporary museum exhibits within PSNM: one located in the second-floor elevator lobby (focusing on the construction process), and one located in the PSNM classroom (focusing on the Hammerhead Crane).
- iii. *Traveling Exhibit:* Fund a modular, pull-up banner-style traveling exhibit designed for regional educational outreach.

Milestone	# Months (after funding is received)	Review/Notification
Conceptual design	12	Signatories and Concurring Parties: Notice of development
Project complete	48	Signatories and Concurring Parties: Notice of completion

e. Salvage and Donation

The Navy shall salvage representative facilities features, to the extent practicable, in accordance with Appendix D.

- i. Prior to dismantling for salvage, the Sail Loft Floor will be fully exposed by removing modern office partitions and obstructions to photograph in its entirety, for HABS/HAER documentation per Stipulation I.B.1.
- ii. Prepare salvaged features (e.g., cleaning, removal of hazardous coatings) prior to transfer.

Milestone	# Months after MOA Execution	Review/Notification
List of salvaged elements	12	Signatories and Concurring Parties: 30-day review
Project complete	48	Signatories and Concurring Parties: Notice of completion

f. Pre-contact and Historic Context Study of Sinclair Inlet

- i. The Navy shall produce a Context Study that focuses on Suquamish historical connections to and ongoing historic and cultural uses of Sinclair Inlet and the upland areas within the Navy installation boundaries, with a specific focus on tribal fishing.
- ii. The study will consist of a literature review of existing archaeological site forms, cultural resource assessment reports, archival and published ethnohistoric and ethnographic information, and past interviews with tribal members.
- iii. All identified relevant information and documentation will be synthesized into a report that will be available for review and comment by the Suquamish Tribe.

Milestone	# Months after MOA Execution	Review/Notification
Project complete	48	Signatories and Concurring Parties: Notice of completion

g. Interactive Digital Tour and Models of Hammerhead Crane

The Navy shall produce a high-resolution 3D scan and interactive digital tour of the Hammerhead Crane.

- i. Capture and process the scan in accordance with HAER guidelines.
- ii. Develop an interactive digital tour, utilizing the 3D scan data, for public accessibility via a Navy-hosted or approved website.
- iii. Produce 50 3D-printed models for educational and interpretive use at PSNM or local educational venues.
- iv. Ensure the digital tour and the associated 3D-modeling files publicly available for download or remote access on a Navy-approved website for a period of two (2) years following completion.

Milestone	# Months after MOA Execution	Review/Notification
Beta version of interactive digital tour	36	Signatories and Concurring Parties: 30-day review
Sample 3D-printed model	12	Signatories and Concurring Parties: 30-day review
Project complete	48	Signatories and Concurring Parties: Notice of completion

II. DURATION

This MOA will remain in effect until December 31, 2038. Prior to such time, the Navy may consult with other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VI below.

III. CHANGES IN PROJECT SCOPE

Navy CR personnel will review changes to project scopes of work throughout the design and construction process. The Navy will notify signatories and concurring parties if a change to a scope of work may change the project APE, the finding of effects, or resolution of effects, and will continue consultation in accordance with Stipulation IV, VI, or VII, as appropriate.

If additional compensatory mitigation sites are identified, the Navy shall continue consultation under Stipulation VII.

IV. POST-REVIEW DISCOVERIES

If properties are discovered that may be historically significant, or unanticipated effects on historic properties found, the Navy shall implement a discovery plan for the Undertaking.

- A. Prior to commencement of the project, the Navy shall develop the discovery and treatment plan for the Undertaking in coordination with signatories and concurring parties to establish protocols for the treatment of such resources.

Milestone	# Months after MOA Execution	Review/Notification
Draft	6	Signatories and Concurring Parties: 30-day review
Final	12	Signatories and Concurring Parties: Notice of completion

V. MONITORING AND REPORTING

Each year, within 60 calendar days of the anniversary of the execution of this MOA, the Navy shall provide all signatories and concurring parties with an annual report detailing work undertaken pursuant to its terms, to include the following as applicable:

- A. Progress of mitigation measures
1. Problems encountered
 2. Scheduling changes
 3. Disputes and objections received in the Navy's efforts to carry out the terms of this MOA

The Navy shall schedule the annual meeting for the first three years after execution of this MOA(to be held within 90 calendar days of the anniversary of the execution of this MOA), among signatories and concurring parties to review implementation of this MOA and discuss the contents of the annual report. Beginning four years after execution, the Navy shall schedule biennial meetings thereafter, to be held within 90 calendar days of the anniversary of the execution of this MOA.

Upon completion of all binding commitments, the Navy will prepare a closeout letter to SHPO and concurring parties that summarizes the commitments and completion dates for each.

VI. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the Navy shall consult with such party to resolve the objection. If the Navy determines that such objection cannot be resolved, the Navy will take the following actions:

- A. Forward all documentation relevant to the dispute, including the Navy's proposed resolution, to the ACHP. The ACHP shall provide the Navy with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the Navy shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories, and concurring parties; and provide them with a copy of this written response. The Navy will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the 30-day time period, the Navy may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the Navy shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA and provide the ACHP with a copy of such written response.
- C. The Navy's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all the signatories is filed with the ACHP.

Any signatory may propose an amendment, and the amendment process starts when a signatory notifies the other signatories in writing requesting an amendment. The notification will include the proposed amendments and the reasons supporting them. The signatories involved will consult to consider any proposed amendment.

VIII. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party will immediately consult with the other signatories to attempt to develop an amendment per Stipulation VI, above. If within 30 days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing the undertaking, the Navy must either (a) execute an MOA pursuant to 36 CFR part 800.6; or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR part 800.7. The Navy will notify the signatories as to the course of action it will pursue.

IX. ANTI-DEFICIENCY ACT

- A. The Anti-Deficiency Act (31 U.S.C. section 1341) prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. Accordingly, the signatories agree that any requirement for obligation of funds arising from the terms of this MOA will be subject to the availability of appropriated funds for that purpose, and that the stipulations contained in this MOA will not be interpreted to require the obligation or expenditure of funds in violation of the Anti-Deficiency Act.
- B. If compliance with the Anti-Deficiency Act alters or impairs the Navy's ability to implement the stipulations of this MOA, the Navy will consult with the signatories. If an amendment is necessary, the provisions of Stipulation VI: Amendments will be followed.

Execution of this MOA by the Navy and the SHPO, and implementation of its terms, are evidence that the Navy has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

DEPARTMENT OF THE NAVY

J. R. TOWNSEND, Rear Admiral, USN

Date: _____

WASHINGTON STATE HISTORIC PRESERVATION OFFICER

ALLYSON BROOKS, PhD
Washington State Historic Preservation Officer

Date: _____

CONCURRING PARTIES:

NATIONAL PARK SERVICE

RANDOLPH LAVASSEUR
Regional Director (Acting)
National Park Service
Interior Regions 8, 9, 10, 12

Date: _____

SUQUAMISH INDIAN TRIBE OF THE PORT MADISON RESERVATION

LEONARD FORSMAN
Chairman

Date: _____

NAVAL HISTORY AND HERITAGE COMMAND

SAMUEL J. COX
Rear Admiral, U.S. Navy (Ret.)
Director, NHHC

Date: _____

CITY OF BREMERTON

GREG WHEELER
Mayor

Date: _____

KITSAP TRANSIT

JOHN CLAUSON
Executive Director

Date: _____

PORT OF BREMERTON

JIM ROTHLIN
Chief Executive Officer

Date: _____

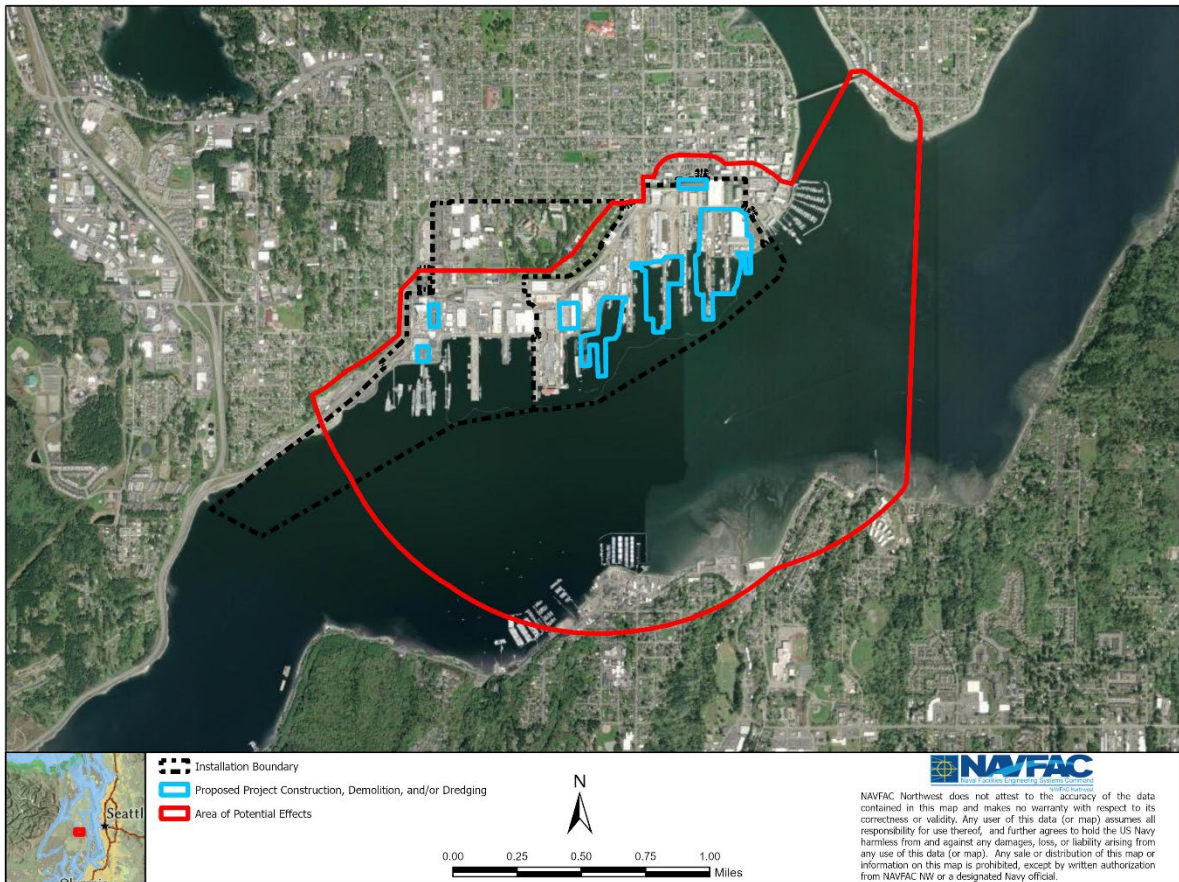
PUGET SOUND NAVY MUSEUM

DANELLE EATON
Director, PSNM

Date: _____

APPENDIX A
AREA OF POTENTIAL EFFECTS

DRAFT



NBK-Bremerton Area of Potential Effects



NBK-Bangor Area of Potential Effects



NBK-Keyport Area of Potential Effects



NBK-Jackson Park Area of Potential Effects



Evergreen Rotary Park Area of Potential Effects

APPENDIX B
HABS/HAER DOCUMENTATION PROCESS AND FACILITIES LIST

In accordance with Stipulation I.B.a, Historic American Building Survey/Historic American Engineering Record (HABS/HAER) documentation will be completed using the process outlined below for the facilities in the following table. Documentation details will be determined in coordination with the National Park Service (NPS) as HABS/HAER projects are initiated.

Process

1. Prior to the commencement of the project, the Navy will contact the regional HABS/HAER/ Historic American Landscape Survey (HALS) coordinator at the NPS Interior Regions 8, 9, 10, and 12 Regional Office to request that NPS stipulate the level and procedures for completing the documentation.
2. Within 10 days of receiving the NPS stipulation letter, the Navy shall send a copy of the letter to all consulting parties for their information.
3. The Navy will ensure that all recordation documentation activities are performed or directly supervised by architects, historians, photographers, or other professionals who meet the qualification standards in the Secretary of Interior's Professional Qualification Standards (36 Code of Federal Regulations 61, Appendix A).
4. The Navy shall submit the draft HABS/HAER/HALS documentation package to NPS for review prior to finalization.
5. The Navy shall provide the final archival and digital HABS documentation package to the NPS for acceptance and submission to the Library of Congress HABS/HAER/HALS collection.
6. Upon receipt of the NPS written acceptance letter, the Navy will make archival and digital copies of the documentation and provide them to the State Historic Preservation Officer.
7. The Navy shall notify the State Historic Preservation Officer that the documentation has been accepted by NPS and all copies distributed. All documentation shall be completed prior to the commencement of the project.

Resource Name	NHL or NRHP	Type of Submission
Puget Sound Naval Shipyard & Intermediate Maintenance Facility	NHL/NRHP	HAER WA-116 overview
Dry Dock 3 (including Pump well 3 and 3A, and tunnels)	NHL	HAER WA-116-E addendum
Hammerhead Crane	NHL	HAER WA-116 sub report
Shipfitter/Welder Shop (including historic machinery)	NHL	HAER WA-116 sub report
Forge Shop (including historic machinery)	NHL	HAER WA-116 sub report
Foundry (including historic machinery)	NHL	HAER WA-116 sub report
Pier 4	NHL	HAER WA-116 sub report
Pier 6	NHL	HAER WA-116 sub report
Pier 7	NHL	HAER WA-116 sub report
Pier 4 Electrical Substation 4	NHL	HAER WA-116 sub report
Electrical Substation 6	NHL	HAER WA-116 sub report
Pier 6 Substations (2)	NHL	HAER WA-116 sub report

Resource Name	NHL or NRHP	Type of Submission
Crane Rail System	NHL	HAER WA-116 sub report
Standard Gauge Rail System	NHL	HAER WA-116 sub report
Lead Working Facility	NRHP	HAER WA-116 sub report
Acetylene Loading Facility	NRHP	HAER WA-116 sub report
Pump well No. 1 under East Air Compressor Building	NRHP	HAER WA-116 sub report
Security Building	NRHP	HABS WA-203 sub report
Ambulance Garage	NRHP	HABS WA-203 sub report

Notes: HABS = Historic American Buildings Survey, HAER = Historic American Engineering Record, NHL = National Historic Landmark, NRHP = National Register of Historic Places, WA = Washington

APPENDIX C
PUGET SOUND NAVY MUSEUM
EXHIBIT OUTLINE – DRAFT

PUGET SOUND NAVY MUSEUM EXHIBIT OUTLINE – DRAFT

The exhibit will encompass approximately 2,500 square feet on the first floor of the Puget Sound Navy Museum. It will explore the history, ongoing work, and future significance of the Puget Sound Naval Shipyard & Intermediate Maintenance Facility (PSNS & IMF), and show how it has shaped regional industry, national defense, and the lives of generations of shipyard employees and Sailors. Completion target is September 2031 to coincide with PSNS & IMF's 140th anniversary, contingent upon the demolition and physical delivery schedule of the Hammerhead Crane cab.

Through various storytelling elements including artifacts, multimedia, both hands-on and digital interactives and oral history interviews, the exhibit will help visitors understand how the Shipyard was established, the critical work performed, and how the Shipyard continues to evolve over time. This exhibit will be designed for a broad public audience—including but not limited to families, school groups, Navy personnel, veterans, and tourists.

Tentative narrative framework will explore the past, present, and future of the Shipyard through topics such as:

- Origins and early growth (1890s–1910s)
- Shipbuilding contributions during and after World War I
- Physical growth during the Great Depression
- Contributions to the war effort during World War II, with 32,000 employees and work on the Ghost Fleet of battleships that survived Pearl Harbor
- Transition to nuclear era
- Pioneering the process of recycling submarines
- Aircraft carrier homeport
- Ongoing construction and preparations to receive Ford-class carriers

Integrated throughout the exhibit will be stories of the people who make the Shipyard function, including civilian workers, Navy personnel, apprentices, and multigenerational Shipyard families. The exhibit will also incorporate STEM topics such as patternmaking and welding.

When visitors experience the exhibit, they will:

- Understand why PSNS & IMF is vital to the U.S. Navy
- Recognize the technological complexity of the work performed
- Appreciate the contributions of generations of Shipyard workers and Sailors
- See the Shipyard as a living, evolving institution, continuing to adapt to the changing needs of the Navy

APPENDIX D
FACILITIES FEATURES TO BE SALVAGED

Facility	Salvaged Feature
Hammerhead Crane	Large wrenches used for crane maintenance
Hammerhead Crane	Operator's cabin or controls and chair
Hammerhead Crane	Aircraft warning light
Hammerhead Crane	Section of cabling
Hammerhead Crane	Section of steel from crane itself; stamped with manufacturer name, if feasible
Hammerhead Crane	Section of electrical panel used to operate the crane
Sail Loft Floor	Sections TBD

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