U.S. Department of Homeland Security

United States Coast Guard

# EXPANSION AND MODERNIZATION OF BASE SEATTLE

## DRAFT
## PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

## VOLUME 2 - APPENDICES

October 2022

U.S. Coast Guard Shore Infrastructure Logistics Center
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203.

**DRAFT**
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

**for**

**EXPANSION AND MODERNIZATION OF BASE SEATTLE**

**Volume 2 - Appendices**

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# Appendix A:
# Existing Conditions of Base Seattle Infrastructure

# Appendix A
# Existing Conditions of Base Seattle Infrastructure

Base Seattle has both waterside and shoreside components. Waterside infrastructure includes two piers that operate four berths (Piers 36 and 37), a boathouse, a boat lift station, and floating docks to support small boat operations:

- Pier 36, including Berths A and B (or Piers 36A and 36B, respectively) was constructed in 1925 by the Pacific Steamship Company. Pier 36A was reconstructed in 2003 and includes a berth length of 468 feet (FT) with a concrete deck that is supported by concrete piles. Pier 36B is 472 FT in length and is constructed of treated timber. Off-gassing from the treated pilings has created an air quality hazard that has been identified for remediation. A boat lift is also located at Pier 36.

- Pier 37, including Berths C and D (or Piers 37C and 37D, respectively) was constructed in 1941 and includes a combined usable berth length of 940 FT. In 1992, Pier 37 was reconstructed as a concrete deck with concrete support piles and is considered in good condition.

- A small floating boat house with associated floating docks is connected to Pier 36B.

Shoreside infrastructure includes 10 buildings, parking areas, roadways, utilities, and security (gate and fencing). Buildings at Base Seattle include Buildings 1, 2, 3, 4, 5, 6, 7, 10, 12, and 14, which are described in more detail below. With the exception of Building 4 (Shore Operations), most buildings and infrastructure at Base Seattle are significantly aged and out of compliance with current building codes or safety requirements, do not provide adequate utility service, or do not allow for efficient operations (USCG 2006). Most buildings at Base Seattle were constructed before 1950 and were originally designed for uses other than the function(s) they currently support.

**Building 1: Administrative and Medical and Dental Clinic**

Building 1 was constructed in 1926, contains six floors, including a basement level, and occupies a total of 46,396 gross square feet (GSF) primarily composed of administrative office space, Station Seattle, and the Medical and Dental Clinic. Five Detached Duty (DD)-Surface Forces Logistics Center (SFLC) departments occupy a total of 2,657 net square feet (NSF) of office space. The remaining 26,499 NSF is occupied by other Base Seattle departments such as the Command Cadre, Personnel Services Division, Servicing Personnel Office, and Work-life Division. Station Seattle occupies administrative office, classroom, and personnel support spaces on the first floor. The Medical and Dental Clinics occupy the entire second floor. Building 1 is outdated and should be brought up to current building codes and seismic standards.

**Building 2: Exchange**

Building 2, constructed in 1930, consists of 9,831 GSF and contains two levels. Building 2 is Base Seattle's Exchange, which offers goods and services to eligible personnel seven days per week. On the second floor, space is allocated to administrative offices and a personnel break room. Building 2 is outdated and should be brought up to current building codes and seismic standards.

**Building 3**: **Industrial Shops and Operations**

Originally designed as a commercial marine passenger and freight terminal for Pacific Steamship Terminals in 1923, Building 3 is a 136,000-GSF single-level, multipurpose warehouse constructed partially on upland fill and partially over water on Pier 36. The building is beyond its service life and was recommended for demolition by the United States Coast Guard (USCG) in 2019 (2019). The building has been deemed vulnerable to structural damage in a seismic event, which could result in liquefaction of the fill and tidal flat deposits below the building and Pier 36 B (USCG 2006).

Building 3 occupants include Facilities Engineering (FE), Naval Engineering Detachment (NED) Seattle, SFLC – Detached Duty, Sector Puget Sound Engineering, Sector Puget Sound Boarding Team, Station Seattle, the Base Seattle Fitness Center, warehousing and storage space, and other various administrative functions. The building has high energy costs and numerous environmental issues of concern, including the presence of lead-based paint, asbestos-containing materials, and hazardous indoor air quality.

Air quality within the building is an ongoing, closely monitored health and worker safety issue. Currently, personnel are limited to no more than one hour of occupancy per day in Building 3 and have been temporarily relocated during building maintenance (personal communication LCDR Kawada 2019). The demolition Building 3 have been identified as part of a cumulative action under a Comprehensive Environmental Response, Compensation, and Liability Act action because of these contamination-related issues.

**Building 4: Shore Operations**

Building 4 is a four-story, 60,787-GSF building occupied by Sector Seattle, the Base Command, Control, Communications, Computers, Information Technology (C4IT) department, and the Seattle Electronic Support Detachment (ESD). Constructed in 2006, Building 4 is the newest building at Base Seattle. Both the Offshore Patrol Cutter (OPC) and Polar Security Cutter (PSC) Feasibility Studies identified excess/available space in Building 4 to support administrative functions.

**Building 5: United States Coast Guard Museum Northwest**

Building 5 is 6,758-GSF, three-story building operated by local volunteers, with the Base Seattle Command Cadre overseeing management of the space. The basement and first floor of Building 5 are occupied by the museum; the second floor is used as the base All Hands Club. Building 5 is not in need of replacement and meets current building codes.

**Building 6: Unaccompanied Personnel Housing and Galley**

Building 6 was constructed in the late 1970s and is a 20,513-GSF, three-story building. The Base Seattle Dining Facility is in Building 6 and serves all Base Seattle personnel and visitors. UPH is also located within Building 6. Base Seattle's Unaccompanied Personnel Housing (UPH) accommodates 25 personnel, with 13 double rooms and 9 single rooms. Building 6 is outdated and should be brought up to current building codes and seismic standards.

**Building 7**: **Warehouse Building**

Building 7 was constructed in 1941 and is a four-story, 376,023-GSF warehouse that provides space for storage, shops, a small arms range, administrative spaces, and indoor parking. The building directly fronts a public street with no setback.

Building 7 is used for both USCG and non-USCG uses. A nonprofit organization, Saint Martin de Porres, operates a 212-bed overnight homeless shelter in the building. The first floor serves as boat and boat trailer parking/storage; privately owned vehicle (POV) and government-owned vehicle (GOV) parking; and caged storage for homeported cutters and tenant commands. Industrial-capacity elevators allow heavy equipment storage on multiple levels of the facility.

The warehouse is located on low-quality fill in a tsunami zone that is at risk of liquefaction and inundation during a major seismic event. Previous USCG studies recommended that personnel avoid full-time occupancy of this building because it does not comply with current building codes. A 2019 USCG Business Case Analysis (BCA) recommends seismically retrofitting Building 7 for personnel occupancy and long-term use (USCG 2019a).

**Buildings 10 and 12: Armory and Magazine**

Building 10 is an 11,209-GSF building that is primarily occupied by the Aids to Navigation Team (ANT; administrative, shop, and storage space) and Forcecom (FC) Armory Detachment (administrative and vault/workshop). Sector Seattle also occupies office space within this building. Building 10 is largely a single-story building with portions of office/warehouse space extending to a second level.

Building 12 is a single-level 1,481-GSF small arms and pyrotechnics storage magazine used by Base Seattle tenants. Building 12 has an explosives safety quantity distance (ESQD) arc of 100 FT that extends from the magazine to the base fence line and southern face of Building 10.

**Building 14: Base Security**

Building 14 is a 3,946-GSF space that houses the Base Seattle Security Division and serves as the hazardous waste storage facility for Base Seattle tenants. The first section of the building was constructed in 1995 and the second section was constructed in 2002. Building 14 is a single-story building with the second section only partially enclosed. Building 14 has no current seismic concerns.

**Parking and Roadways**

Vehicle parking is very constrained and limited at Base Seattle. Previous studies identified 641 parking spaces onsite, which is inadequate to accommodate current demand (NSC 2012); the USCG leases 1 acre (AC) of land southwest of Building 7 for GOV parking and equipment that cannot be accommodated onsite. Paved roadways are currently in functional condition but will need to be replaced following completion of any major project actions.

**Utilities**

The Public Works Division (PWD) is responsible for the day-to-day operations of FE and administers the Preventive Maintenance Program for the base facilities, equipment, and maintenance work request system. PWD is separated into two branches: Buildings and Grounds Branch and Utilities Branch. Buildings and Grounds oversees the daily maintenance of stationary buildings, fixed systems, and cable television (CATV) throughout the base; the Utilities Branch is staffed with certified heating, ventilation, and air conditioning (HVAC) mechanics and electricians and is responsible for electrical distribution systems, refrigeration/ventilation systems, and climate-controlled spaces.

**Gate Station/Entry Control Point and Security**

Existing security infrastructure at Base Seattle includes a perimeter fence around the entire landside portion of the Base, and one main Entry Control Point (ECP) and two smaller gates located off Alaskan Way. The two smaller gates are not used for access to the base on a regular basis but can be opened to provide entry for equipment if needed/approved. Anti-terrorism / Force Protection (AT/FP) issues pose significant risks at Base Seattle. The setback distance between Pier 37 and Port of Seattle container storage at Terminal 46 is 40 feet and the USCG requires an additional 200 feet to meet both security and operational requirements. Trucks may park within a preferred setback distance from Building 7 outside the ECP, but there is no distinction or safety separation between operational areas and adjacent spaces with public areas, and the security gate at Base Seattle is not functioning properly (e.g., the roller on the gate is currently too long, which occasionally prevents it from closing).

# Appendix B:
# Federal Register Notification

*Agenda:* To review and evaluate personnel qualifications and performance, and competence of individual investigators.

*Place:* PORTER NEUROSCIENCE RESEARCH CENTER, Building 35A, 35 Convent Drive, Bethesda, MD 20892 (Virtual Meeting).

*Time:* June 2, 2021, 11:00 a.m. to 6:30 p.m.

*Agenda:* To review and evaluate personnel qualifications and performance, and competence of individual investigators.

*Place:* PORTER NEUROSCIENCE RESEARCH CENTER, Building 35A, 35 Convent Drive, Bethesda, MD 20892 (Virtual Meeting).

*Time:* June 3, 2021, 2:20 p.m. to 6:00 p.m.

*Agenda:* To review and evaluate personnel qualifications and performance, and competence of individual investigators.

*Place:* PORTER NEUROSCIENCE RESEARCH CENTER, Building 35A, 35 Convent Drive, Bethesda, MD 20892 (Virtual Meeting).

*Contact Person:* Jennifer E Mehren, Ph.D., Scientific Advisor, Division of Intramural Research Programs, National Institute of Mental Health, NIH, 35A Convent Drive, Room GE 412, Bethesda, MD 20892–3747, 301–496–3501, *mehrenj@mail.nih.gov.*

(Catalogue of Federal Domestic Assistance Program Nos. 93.242, Mental Health Research Grants, National Institutes of Health, HHS)

Dated: May 4, 2021.

**Melanie J. Pantoja,**

*Program Analyst, Office of Federal Advisory Committee Policy.*

[FR Doc. 2021–09745 Filed 5–6–21; 8:45 am]

**BILLING CODE 4140–01–P**

## DEPARTMENT OF HEALTH AND HUMAN SERVICES

### National Institutes of Health

### National Institute on Drug Abuse; Notice of Closed Meetings

Pursuant to section 10(d) of the Federal Advisory Committee Act, as amended, notice is hereby given of the following meetings.

The meetings will be closed to the public in accordance with the provisions set forth in sections 552b(c)(4) and 552b(c)(6), Title 5 U.S.C., as amended. The grant applications and the discussions could disclose confidential trade secrets or commercial property such as patentable material, and personal information concerning individuals associated with the grant applications, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.

*Name of Committee:* National Institute on Drug Abuse Special Emphasis Panel; Digital Technologies to Address the Social Determinants of Health in Context of Substance Use Disorders (SUD) (R41/R42/R43/R44).

*Date:* June 4, 2021.

*Time:* 12:00 p.m. to 5:00 p.m.

*Agenda:* To review and evaluate grant applications.

*Place:* National Institutes of Health, National Institute on Drug Abuse, 301 North Stonestreet Avenue, Bethesda, MD 20892 (Virtual Meeting).

*Contact Person:* Trinh T. Tran, Ph.D., Scientific Review Officer, Office of Extramural Policy and Review, Division of Extramural Research, National Institute on Drug Abuse, NIH, 301 North Stonestreet Avenue, MSC 6021, Bethesda, MD 20892, (301) 827–5843, *trinh.tran@nih.gov.*

*Name of Committee:* National Institute on Drug Abuse Special Emphasis Panel; Novel Approaches to Decrease Stigma of Substance Use Disorders in order to Facilitate Prevention, Treatment, and Support During Recovery (R41/R42/R43/R44).

*Date:* June 7, 2021.

*Time:* 12:00 p.m. to 3:00 p.m.

*Agenda:* To review and evaluate grant applications.

*Place:* National Institutes of Health, National Institute on Drug Abuse, 301 North Stonestreet Avenue, Bethesda, MD 20892 (Virtual Meeting).

*Contact Person:* Trinh T. Tran, Ph.D., Scientific Review Officer, Office of Extramural Policy and Review, Division of Extramural Research, National Institute on Drug Abuse, NIH, 301 North Stonestreet Avenue, MSC 6021, Bethesda, MD 20892, (301) 827–5843, *trinh.tran@nih.gov.*

*Name of Committee:* National Institute on Drug Abuse Special Emphasis Panel; America's Startups and Small Businesses Build Technologies to Stop the Opioid Epidemic (R43/R44/R41/R42—Clinical Trial Optional).

*Date:* June 17–18, 2021.

*Time:* 9:00 a.m. to 6:00 p.m.

*Agenda:* To review and evaluate grant applications.

*Place:* National Institutes of Health, National Institute on Drug Abuse, 301 North Stonestreet Avenue, Bethesda, MD 20892 (Virtual Meeting).

*Contact Person:* Gerald L. McLaughlin, Ph.D., Scientific Review Officer, Office of Extramural Policy and Review, National Institute on Drug Abuse, NIH, 301 North Stonestreet Avenue, MSC 6021, Bethesda, MD 20892, (301) 827–5819, *gm145a@nih.gov.*

*Name of Committee:* National Institute on Drug Abuse Special Emphasis Panel; NIDA Career Development and Education SEP (K99/R00 and R25).

*Date:* June 29–30, 2021.

*Time:* 10:00 a.m. to 5:00 p.m.

*Agenda:* To review and evaluate grant applications.

*Place:* National Institutes of Health, National Institute on Drug Abuse, 301 North Stonestreet Avenue, Bethesda, MD 20892 (Virtual Meeting).

*Contact Person:* Sindhu Kizhakke Madathil, Ph.D., Scientific Review Officer, Scientific Review Branch, National Institute on Drug Abuse, NIH, 301 North Stonestreet Avenue, MSC 6021, Bethesda, MD 20892, (301) 827–5702, *sindhu.kizhakkemadathil@nih.gov.*

(Catalogue of Federal Domestic Assistance Program Nos. 93.277, Drug Abuse Scientist Development Award for Clinicians, Scientist Development Awards, and Research Scientist Awards; 93.278, Drug Abuse National Research Service Awards for Research Training; 93.279, Drug Abuse and Addiction Research Programs, National Institutes of Health, HHS)

Dated: May 4, 2021.

**Tyeshia M. Roberson,**

*Program Analyst, Office of Federal Advisory Committee Policy.*

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**BILLING CODE 4140–01–P**

## DEPARTMENT OF HOMELAND SECURITY

### Coast Guard

**[Docket Number USCG–2021–0183]**

### Modernization of Coast Guard Base Seattle; Preparation of Programmatic Environmental Impact Statement

**AGENCY:** Coast Guard, DHS.

**ACTION:** Notice of intent to prepare a Programmatic Environmental Impact Statement; notice of virtual scoping; and request for comments.

**SUMMARY:** The United States Coast Guard, as the lead agency, announces its intent to prepare a Programmatic Environmental Impact Statement (PEIS). The PEIS will evaluate the potential environmental consequences of the Coast Guard's Proposed Action to expand and modernize Coast Guard Base Seattle in Seattle, Washington. Notice is hereby given that the public scoping process has begun for the preparation of a PEIS for the Proposed Action. The purpose of the scoping process is to solicit public comments regarding the range of issues, information, and analyses relevant to the Proposed Action, including potential environmental impacts and reasonable alternatives to address in the PEIS. This PEIS is being prepared in compliance with the National Environmental Policy Act (NEPA) of 1969 and the regulations implemented by the Council on Environmental Quality. The Coast Guard has determined that a PEIS is the most appropriate type of NEPA document for this action because the Proposed Action is anticipated to occur over several years, and many of the site-specific project details are not known. This notice also notifies the public that the Coast Guard intends to host a web-based, web-based project site to provide additional information to the public and to solicit comments on potential issues, concerns, and reasonable alternatives that should be considered in the PEIS.

Following the scoping period, a Draft PEIS will be prepared and ultimately circulated for public comment.

**DATES:** Public Scoping comments and related material must be post-marked or received by the Coast Guard on or before June 21, 2021. A representative will respond to substantive and relevant questions submitted via *https://virtual.woodplc.com/VirtualSpace/102907,* or emailed to *BaseSeattlePEIS@uscg.mil,* during normal business hours (Pacific Standard Time) between May 7, 2021–June 14, 2021.

**ADDRESSES:** You may submit comments identified by docket number USCG–2021–0183 using the Federal eRulemaking Portal at *https://www.regulations.gov.* See the ''Public Scoping Process'' portion of the **SUPPLEMENTARY INFORMATION** section for further instructions on submitting comments. A virtual scoping tool will be available at *https://virtual.woodplc.com/VirtualSpace/102907.* If electronic comments cannot be submitted, written comments can be sent to: U.S. Coast Guard, Shore Infrastructure Logistics Center, Environmental Management Division, Attn: Mr. Dean Amundson, 1301 Clay Street, Suite 700N, Oakland, CA 94612–5203.

**FOR FURTHER INFORMATION CONTACT:** For information about this document call or email Dean Amundson, Coast Guard; telephone 510–637–5541, *BaseSeattlePEIS@uscg.mil.*

**SUPPLEMENTARY INFORMATION:** This Notice of Intent briefly summarizes the proposed project, including the purpose and need and possible alternatives. As required by the National Environmental Policy Act of 1969 (NEPA) and Council on Environmental Quality (CEQ) implementing regulations (40 CFR 1500–1508, specifically § 1502.3), a Federal agency must prepare an EIS if it is proposing a major Federal action to analyze the environmental consequences of implementing each of the alternatives, if carried forward for full review following public scoping, by assessing the effects of each alternative on the human environment.

## Purpose and Need for the Proposed Action

Base Seattle supports, and will continue to support, the Coast Guard's execution of its statutory missions, pursuant to 14 U.S.C. 102. The Coast Guard's Base Seattle is located on Puget Sound in Seattle, Washington. The Base serves as the homeport for several Coast Guard cutters and provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation.

The purpose of the Proposed Action is to provide adequate facilities and infrastructure at Base Seattle to support current and future execution of the Coast Guard's statutory missions. Base Seattle is the largest Coast Guard facility in the Pacific Northwest and is an essential facility to support Coast Guard missions in the Pacific Northwest and Polar regions now and for the foreseeable future. To continue to support Coast Guard mission execution throughout these regions, expansion and extensive modernization of Base Seattle is required.

The need for the Proposed Action is to address substantial existing deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard missions, as well as provide facility enhancements necessary to support current and future major cutters homeported at Base Seattle. Three new Polar Security Cutters are planned to be homeported at Base Seattle. In addition, one existing icebreaker—CGC HEALY—is expected to remain at Base Seattle, and up to four other major cutters may be homeported at Base Seattle in the future, replacing two existing high endurance cutters. Advances in major cutter technology require infrastructure enhancements and renovations to accommodate the increased size and shore-side support requirements associated with these advanced operating assets. The Coast Guard has identified deficiencies that include, but are not limited to, a lack of adequate land area, incompatible land uses, shortage of berthing capacity, out of date and inadequate facilities and infrastructure, and traffic congestion and parking shortfalls, as well as the need for improved resiliency in the event of natural disasters, and improved physical security capabilities.

Modernization and renovation efforts would ensure operational and mission support requirements are properly provided for and would enhance the resiliency and long-term sustainability of Base Seattle facilities and infrastructure. Planning with future mission flexibility in mind also minimizes the need for costly future infrastructure modifications and resulting environmental impacts.

## Preliminary Proposed Action and Alternatives

Coast Guard has identified a Proposed Action and preliminary Alternatives for potential consideration in the PEIS. A No-Action and three preliminary, reasonable Action Alternatives are presented for consideration for public review and comment. The Proposed Action would expand Base Seattle and modernize existing facilities and infrastructure over approximately the next 10 years.

### *Actions Common to All Alternatives*

All three Action Alternatives include several common actions, including the following:

- Demolishing existing, deficient buildings 1, 2, 2 Annex, 10, and 12, and consolidating the functions of these buildings into a new 3-story, approximately 36,000 square foot Mission Support Building, and a new 5-story, approximately 75,000-square-foot Base Administration Building.
- Rehabilitating or rebuilding Building 7 and a small area of Terminal 46 to meet current needs, as well as building codes and seismic standards, and other potential seismic stabilization throughout the Base.
- Upgrading the main gate of the Base and the security fencing and functions, including expanding fencing to incorporate any newly acquired property.
- Modernizing communications, electrical, natural gas, sanitary sewer, potable water, and storm sewer utilities, and realigning these utilities to correspond with the development pattern under each of the alternatives.
- Realigning parking, roadways, walkways, and landscaping to correspond with the development pattern under each of the alternatives.

The three Action Alternatives differ in the amount of land proposed for acquisition.

### *Alternative 1—Modernization With Land Acquisition at Terminal 46*

Under Alternative 1, the Coast Guard would acquire approximately 54.1 acres from the Port of Seattle, consisting of a currently leased, approximately 1.1 acre parcel within the existing Base footprint and up to 53 acres of Terminal 46. This alternative would include acquisition of two existing berths at Terminal 46.

### *Alternative 2—Modernization With Land Acquisition at Terminals 30 and 46*

Under Alternative 2, the Coast Guard would acquire approximately 21.5 acres from the Port of Seattle, consisting of two currently leased properties within the existing Base footprint, totaling approximately 2.2 acres, approximately 0.3 acre Burlington-North Santa Fe (BNSF) property, approximately 5.5 acres of Terminal 46, and approximately 13.5 acres of Terminal 30. This alternative would allow for

development of one new berth on current Coast Guard property and one new berth on acquired property at Terminal 30.

*Alternative 3—Modernization With Reduced Land Acquisition at Terminal 46*

Under Alternative 3, the Coast Guard would acquire approximately 24.25 acres from the Port of Seattle, including two currently leased properties within the existing Base footprint, totaling approximately 2.2 acres, approximately 0.3 acre BNSF property, and approximately 21.75 acres of Terminal 46. This alternative would allow for development of one new berth on current Coast Guard property and include acquisition of one existing berth at Terminal 46.

*No-Action Alternative*

The Coast Guard will also analyze a No-Action Alternative. For the purposes of this PEIS, the No-Action Alternative is defined as not implementing Base expansion and facility and infrastructure modernization requirements. This would result in a loss of operational capabilities.

**Scope of Analysis for the PEIS**

The Coast Guard is proposing to undertake a removal action at Base Seattle pursuant to Comprehensive Environmental Response, Compensation, and Liability Act actions (CERCLA) (42 United States Code 9601) in conjunction with the U.S. Environmental Protection Agency, to address known contamination. The Coast Guard will not make a decision on any CERCLA actions since they fall outside of the scope of a NEPA analysis, consistent with 40 CFR 1501.1(a)(6). The impacts of any current and potential future CERCLA projects will be considered within the baseline of the affected environment under the PEIS.

**Summary of Expected Impacts**

Acoustic and physical stressors associated with the Proposed Action may potentially impact the physical and biological environment in and around Base Seattle. The primary potential physical stressor is from the construction and operation of facilities and infrastructure. Stressors associated with the Proposed Action may potentially impact air quality, ambient sound, biological resources (including critical habitat), coastal resources, cultural resources (including Tribal fishing rights), traffic and circulation, and socioeconomic resources.

The PEIS will evaluate the likelihood that a resource would be exposed to or encounter a stressor and identify the potential impact associated with that exposure or encounter. The likelihood of an exposure or encounter is based on the stressor, location, and timing relative to the spatial and temporal distribution of each biological resource or critical habitat. Most work associated with the proposed action would occur on shore and could potentially affect terrestrial resources; there is the potential for some in-water activities that could affect aquatic resources.

**Anticipated Permits and Authorizations**

The Proposed Action is programmatic in nature and specific projects are anticipated to occur over the next decade. Many of the site-specific project details are not known. As such, permits and authorizations will be identified in the PEIS. Certain approvals may be completed as part of the PEIS, but many of the specific permits and authorizations would not necessarily be issued for site-specific projects until they are programmed, funded, and design details are developed. Implementation of all alternatives will ultimately require compliance with the following laws and regulations through issuance of permits and/or authorizations:

The Coastal Zone Management Act (CZMA; 16 U.S.C. 1451 *et seq.*) was enacted to protect the coastal environment from demands associated with residential, recreational, and commercial uses. The Coast Guard would determine the impact of the Proposed Action and provide a Coastal Consistency Determination or Negative Determination to the Washington Department of Ecology for the proposed modernization activities at Base Seattle.

The Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*) provides for the conservation of endangered and threatened species and the ecosystems on which they depend. The Coast Guard anticipates engaging with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service, pursuant to Section 7 of the ESA, which have jurisdiction over ESA-listed species and critical habitat (50 CFR 402.14(a)). Project specific consultation under Section 7 may not necessarily occur until a later date when site specific project details are known.

The Marine Mammal Protection Act (MMPA; 16 U.S.C. 1361 *et seq.*) regulates ''take'' of marine mammals in U.S. waters. The term ''take'' as defined in Section 3 (16 U.S.C. 1362) of the MMPA, means ''to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal.'' ''Harassment'' was further defined in the 1994 amendments to the MMPA as any act of pursuit, torment, or annoyance which (i) has the potential to injure a marine mammal or marine mammal stock in the wild (*i.e.,* Level A Harassment); or (ii) has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering (*i.e.,* Level B Harassment). The Coast Guard anticipates engaging with the National Marine Fisheries Service although actual authorization for potential Level B Harassment from construction activities may not necessarily occur until a later date when site specific project details are known.

The Clean Water Act (33 U.S.C. 1251, *et seq.*), Section 404 regulates the discharge of dredged or fill material into waters of the United States and the Rivers and Harbors Act (33 U.S.C. 403), Section 10 regulates the obstruction or alteration of navigable waters of the United States. The Coast Guard anticipates that a very limited amount of work conducted as part of the Proposed Action may require a permit from the Corps of Engineers under either the Clean Water Act or Rivers and Harbors Act. Actual authorization for permits will be obtained, if necessary, once site specific project details are known.

The National Historic Preservation Act (NHPA; 16 U.S.C. 470, *et seq.*), Section 106, requires that each federal agency identify and assess the effects its actions may have on historic resources, including potential effects on historic structures, archaeological resources, and tribal resources. The Coast Guard would determine if any historic resources are present in the project area, evaluate the potential for the proposed action to adversely affect these resources, and consult with the Washington State Historic Preservation Officer and any interested or affected Tribes to resolve any adverse effects by developing and evaluating alternatives or measures that could avoid, minimize, or mitigate impacts.

The Clean Air Act (42 U.S.C. 7401, *et seq.*) regulates emissions from both stationary (industrial) sources and mobile sources. The Coast Guard would evaluate the potential for increased emissions during construction and operation of modernized facilities to determine if the emissions would be in conformity with the State Implementation Plan for attainment of National Ambient Air Quality Standards.

In addition, Coast Guard will complete Consultation with all affected Federally Recognized Tribes on a

government-to-government basis in accordance with Executive Order 13175.

**Schedule for the Decision-Making Process**

Following the scoping period announced in this Notice of Intent, and after consideration of all comments received during scoping, Coast Guard will prepare a Draft PEIS for the expansion and modernization of Base Seattle. Once the Draft PEIS is completed, it will be made available for a 45-day public review and comment period. Coast Guard will announce the availability of the Draft PEIS in the **Federal Register** and local media outlets. Coast Guard expects the Draft PEIS will be available for public review and comment in 2021. In meeting CEQ regulations requiring EISs to be completed within 2 years the Coast Guard anticipates the Final PEIS would be available in 2022. Availability of the Final PEIS would be published in the **Federal Register**. If approved, land acquisition would be expected to occur soon after completion of this PEIS, with the first rehabilitation projects, construction projects, or both, expected to begin as early as 2022. Because construction details and designs are not available at this time, new information may become available after the completion of the PEIS. Should new information become available after the completion of the Draft or Final PEIS, supplemental NEPA documentation may be prepared in support of new information or changes in the Proposed Action considered under the PEIS.

**Public Scoping Process**

The Notice of Intent initiates the scoping process, which guides the development of the PEIS. The Coast Guard is seeking comments on the potential environmental impacts that may result from the Proposed Action or preliminary Alternatives. The Coast Guard is also seeking input on relevant information, studies, or analyses of any kind concerning impacts potentially affecting the quality of the human environment as a result of the Proposed Action. NEPA requires federal agencies to consider environmental impacts that may result from a Proposed Action, to inform the public of potential impacts and alternatives, and to facilitate public involvement in the assessment process. The PEIS would include, among other topics, discussions of the purpose and need for the Proposed Action, a description of alternatives, a description of the affected environment, and an evaluation of the environmental impact of the Proposed Action and alternatives.

The Coast Guard intends to follow the CEQ regulations implementing NEPA (40 CFR 1500 et. seq.) by scoping through public comments. Scoping, which is integral to the process for implementing NEPA, provides a process to ensure that (1) issues are identified early and properly studied; (2) issues of little significance do not consume substantial time and effort; (3) the Draft PEIS is thorough and balanced; and (4) delays caused by an inadequate PEIS are avoided.

Public scoping is a process for determining the scope of issues to be addressed in this PEIS and for identifying the issues related to the Proposed Action that may have a significant effect on the environment. The scoping process begins with publication of this notice. The Coast Guard seeks to do the following during the scoping process:

- Invite the participation of Federal, State, and local agencies, any affected Indian tribe, and other interested persons;
- Consult with affected Federally Recognized Tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Native American concerns, including potential impacts on Treaty rights, Indian trust assets, and cultural resources, will be given appropriate consideration;
- Determine the scope and the issues to be analyzed in depth in the PEIS;
- Indicate any related environmental assessments or environmental impact statements that are not part of the PEIS;
- Identify other relevant environmental review and consultation requirements, such as Coastal Zone Management Act consistency evaluations, and threatened and endangered species and habitat impacts; and
- Indicate the relationship between timing of the environmental review and other aspects of the application process.

With this Notice of Intent, Federal, State, Tribal, and local agencies with jurisdiction or special expertise with respect to environmental issues in the project area are asked to formally cooperate with the Coast Guard in the preparation of the PEIS.

Once the scoping process is complete, Coast Guard will prepare a Draft PEIS and will publish a **Federal Register** notice announcing its public availability. The public will be provided with an opportunity to review and comment on the Draft PEIS. After Coast Guard considers those comments, the Final PEIS will be prepared and its availability similarly announced to solicit public review and comment. Comments received during the Draft PEIS review period will be available in the public docket and made available in the Final PEIS.

Pursuant to the CEQ regulations, Coast Guard invites public participation in the NEPA process. This notice requests public participation in the scoping process, establishes a public comment period, and provides information on how to participate.

The 45-day public scoping period begins May 7, 2021 and ends June 21, 2021. Comments and related material submitted to the online docket via *https://www.regulations.gov/* must be received by the Coast Guard on or before June 21, 2021, and mailed submission, must be postmarked on or before that same date.

We encourage you to submit specific, timely, substantive, and relevant comments through the Federal portal at *http://www.regulations.gov,* on the site provided when searching the above docket number or searching for ''Base Seattle PEIS.'' If comments cannot be submitted using *http://www.regulations.gov,* contact the Base Seattle Environmental Planning Program Manager at 510–637–5541 for additional help.

In submissions, please include the docket number for this Notice of Intent and provide reasoning for comments. To be considered timely, comments must be received on or before June 21, 2021 to be considered in the Draft PEIS. Comments mailed to the contact above must be postmarked by June 21, 2021. We will consider all substantive and relevant comments received during the comment period.

We accept anonymous comments. Comments we post to *https://www.regulations.gov* will include any personal information you have provided. For more about privacy and submissions in response to this document, see DHS's eRulemaking System of Records notice (85 FR 14226, March 11, 2020).

We review all comments received, but we will only post comments that address the topic of the notice. We may choose not to post off-topic, inappropriate, or duplicate comments that we receive. Documents mentioned in this Notice of Intent as being available in the docket, and posted public comments, will be in the online docket at *http://www.regulations.gov* and can be viewed by following that website's instructions.

**Virtual Public Involvement**

Consistent with CEQ's recently issued scoping regulation, 40 CFR 1501.9, the Coast Guard will host a web-based

project site to provide additional information to the public on the Proposed Action and alternatives. Website visitors will be able to access relevant information via presentations, site maps, and project summaries, as well as submit questions and view responses to Frequently Asked Questions. Substantive and relevant questions will be answered during normal business hours (Pacific Standard Time) from May 7, 2021 through June 14, 2021. The web-based project site will be available at *https://virtual.woodplc.com/VirtualSpace/102907.* Formal Submission of Public comments must be submitted to the docket, or by mail, as previously described under the Public Scoping section.

Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this Proposed Action.

Dated: April 30, 2021.

**Carola J. List,**

*Rear Admiral, U.S. Coast Guard, Assistant Commandant for Engineering and Logistics.*

[FR Doc. 2021–09523 Filed 5–6–21; 8:45 am]

**BILLING CODE 9110–04–P**

## DEPARTMENT OF HOMELAND SECURITY

### Federal Emergency Management Agency

**[Docket ID FEMA–2021–0002; Internal Agency Docket No. FEMA–B–2129]**

### Proposed Flood Hazard Determinations

**AGENCY:** Federal Emergency Management Agency, Department of Homeland Security.

**ACTION:** Notice.

**SUMMARY:** Comments are requested on proposed flood hazard determinations, which may include additions or modifications of any Base Flood Elevation (BFE), base flood depth, Special Flood Hazard Area (SFHA) boundary or zone designation, or regulatory floodway on the Flood Insurance Rate Maps (FIRMs), and where applicable, in the supporting Flood Insurance Study (FIS) reports for the communities listed in the table below. The purpose of this notice is to seek general information and comment regarding the preliminary FIRM, and where applicable, the FIS report that the Federal Emergency Management Agency (FEMA) has provided to the affected communities. The FIRM and FIS report are the basis of the floodplain management measures that the community is required either to adopt or to show evidence of having in effect in order to qualify or remain qualified for participation in the National Flood Insurance Program (NFIP). In addition, the FIRM and FIS report, once effective, will be used by insurance agents and others to calculate appropriate flood insurance premium rates for new buildings and the contents of those buildings.

**DATES:** Comments are to be submitted on or before August 5, 2021.

**ADDRESSES:** The Preliminary FIRM, and where applicable, the FIS report for each community are available for inspection at both the online location *https://hazards.fema.gov/femaportal/prelimdownload* and the respective Community Map Repository address listed in the tables below. Additionally, the current effective FIRM and FIS report for each community are accessible online through the FEMA Map Service Center at *https://msc.fema.gov* for comparison.

You may submit comments, identified by Docket No. FEMA–B–2129, to Rick Sacbibit, Chief, Engineering Services Branch, Federal Insurance and Mitigation Administration, FEMA, 400 C Street SW, Washington, DC 20472, (202) 646–7659, or (email) *patrick.sacbibit@fema.dhs.gov.*

**FOR FURTHER INFORMATION CONTACT:** Rick Sacbibit, Chief, Engineering Services Branch, Federal Insurance and Mitigation Administration, FEMA, 400 C Street SW, Washington, DC 20472, (202) 646–7659, or (email) *patrick.sacbibit@fema.dhs.gov;* or visit the FEMA Mapping and Insurance eXchange (FMIX) online at *https://www.floodmaps.fema.gov/fhm/fmx_main.html.*

**SUPPLEMENTARY INFORMATION:** FEMA proposes to make flood hazard determinations for each community listed below, in accordance with section 110 of the Flood Disaster Protection Act of 1973, 42 U.S.C. 4104, and 44 CFR 67.4(a).

These proposed flood hazard determinations, together with the floodplain management criteria required by 44 CFR 60.3, are the minimum that are required. They should not be construed to mean that the community must change any existing ordinances that are more stringent in their floodplain management requirements. The community may at any time enact stricter requirements of its own or pursuant to policies established by other Federal, State, or regional entities. These flood hazard determinations are used to meet the floodplain management requirements of the NFIP and are used to calculate the appropriate flood insurance premium rates for new buildings built after the FIRM and FIS report become effective.

The communities affected by the flood hazard determinations are provided in the tables below. Any request for reconsideration of the revised flood hazard information shown on the Preliminary FIRM and FIS report that satisfies the data requirements outlined in 44 CFR 67.6(b) is considered an appeal. Comments unrelated to the flood hazard determinations also will be considered before the FIRM and FIS report become effective.

Use of a Scientific Resolution Panel (SRP) is available to communities in support of the appeal resolution process. SRPs are independent panels of experts in hydrology, hydraulics, and other pertinent sciences established to review conflicting scientific and technical data and provide recommendations for resolution. Use of the SRP only may be exercised after FEMA and local communities have been engaged in a collaborative consultation process for at least 60 days without a mutually acceptable resolution of an appeal. Additional information regarding the SRP process can be found online at *https://www.floodsrp.org/pdfs/srp_overview.pdf.*

The watersheds and/or communities affected are listed in the tables below. The Preliminary FIRM, and where applicable, FIS report for each community are available for inspection at both the online location *https://hazards.fema.gov/femaportal/prelimdownload* and the respective Community Map Repository address listed in the tables. For communities with multiple ongoing Preliminary studies, the studies can be identified by the unique project number and Preliminary FIRM date listed in the tables. Additionally, the current effective FIRM and FIS report for each community are accessible online through the FEMA Map Service Center at *https://msc.fema.gov* for comparison.

(Catalog of Federal Domestic Assistance No. 97.022, ''Flood Insurance.'')

**Michael M. Grimm,**

*Assistant Administrator for Risk Management, Department of Homeland Security, Federal Emergency Management Agency.*

# Appendix C:
# Public Outreach

| ID | Start time | Completion time | Please Provide Your Full | Please Provide Your Email Address | Please provide orginization name or put N/A for individual | re notification | Please Provide Your Mailing Address |
|---|---|---|---|---|---|---|---|
| 4 | 5/8/21 20:13:14 | 5/8/21 20:19:15 | Frederic Nelson | fnelson@seattletimes.com | The Seattle Times | yes | 6524 36th Ave NW Seattle, WA 98117 |
| 5 | 5/9/21 8:19:55 | 5/9/21 8:22:05 | Marvin Gebers | Coastie7098@hotmail.com | N/A | Yes | 772 Topocoba Street, Las Vegas, NV 89178 |
| 6 | 5/9/21 17:01:06 | 5/9/21 17:01:56 | paul suzman | pauls@officelease.com | OfficeLease | yes | 1440 Madrona Drive Seattle WA 98122 |
| 7 | 5/9/21 17:46:06 | 5/9/21 17:46:57 | Campbell Mathewson | cmathewson@cmrepartners.com | CMRE Partners | Yes | 11647 NE 8th St |
| 8 | 5/9/21 20:37:49 | 5/9/21 20:38:45 | robert vogt | bobvogt1949@gmail.com | N/A | Yes | 15721 ne 70th Ct Redmond,WA 98052 |
| 9 | 5/10/21 6:31:25 | 5/10/21 6:32:30 | Ryan Smith | rsmith@martinsmith.com | Martin Smith Inc | Yes please | 1932 1st Ave, Suite 1000, Seattle, WA 98101 |
| 10 | 5/10/21 7:10:11 | 5/10/21 7:11:37 | J. Forrest Nelson | j.forrest.nelson@att.net | N/A | Yes | 14157 - 104th Pl NE, Kirkland WA 98034 |
| 11 | 5/10/21 7:02:47 | 5/10/21 7:15:01 | Jennifer Maietta | jmaietta@nwseaportalliance.com | The Northwest Seaport Alliance | yes | 401 Alaskan Way, Seattle, WA 98014 |
| 12 | 5/10/21 8:27:29 | 5/10/21 8:28:16 | Kelly Rench | kellyr@bergerpartnership.com | Berger Partnership | yes | 1927 Post Alley, Suite 2, Seattle, WA 98115 |
| 13 | 5/10/21 8:45:22 | 5/10/21 8:46:24 | Peter Kahn | georesource206@gmail.com | NA | yes | 916 31st Ave Seattle, WA 98122 |
| 14 | 5/10/21 10:49:04 | 5/10/21 10:49:56 | John Burkhardt | johnbjr@uw.edu | University of Washington Tacoma | yes | Box 358432, 1900 Commerce St., Tacoma, WA 98402-3100 |
| 15 | 5/10/21 11:02:49 | 5/10/21 11:03:42 | Cliff Bates | cbates@nelsontrucking.com | Nelson Trucking Company, Inc. | Yes | |
| 16 | 5/10/21 12:02:22 | 5/10/21 12:03:11 | Bretschneider Dale IC E | dalebret@comcast.net | NA | Yes | 8141 S.E. 44th Street, mercer Island |
| 17 | 5/11/21 8:15:19 | 5/11/21 8:15:48 | Emily Hopkins | ehopkins@mates.org | MITAGS | Yes | 1729 Alaskan Way South |
| 18 | 5/11/21 9:24:01 | 5/11/21 9:26:58 | Marsha Tolon | tolonm@wsdot.w.gov | Washington State Ferries | yes | 2901 3rd Ave, Ste 500, Seattle, WA 98121-3014 |
| 19 | 5/11/21 10:19:37 | 5/11/21 10:20:40 | Susan Kemp | susan.kemp@hartcrowser.com | Hart Crowser, a division of Haley & Aldrich | Yes | 3131 Elliott Avenue, Suite 600, Seattle, WA 98121 |
| 20 | 5/11/21 12:38:24 | 5/11/21 12:38:47 | James Truhan | truhan.j@portseattle.org | | | |
| 21 | 5/11/21 12:40:41 | 5/11/21 12:41:11 | afasdfasdf | adfafdasfa@adfdsaflj.com | N/A | NO | 4444 233 street kirkland wa 98034 |
| 22 | 5/11/21 14:59:45 | 5/11/21 15:01:45 | Tyler Vander Linden | tvanderlinden@kwhconstructors.com | KWH Constructors, Inc. | Yes | 1155 N State St #208, Bellingham, WA 98225 |
| 23 | 5/11/21 15:09:50 | 5/11/21 15:10:46 | Frank Immel | fimmel@gdiving.com | Global Diving & Salvage, Inc. | yes | 3840 W Marginal Way SW, Seattle WA 98106 |
| 24 | 5/13/21 15:08:41 | 5/13/21 15:09:27 | John LeCompte | john.lecompte@seattle.gov | Seattle City Light | Yes | 700 5th Ave, Suite 3200 |
| 25 | 5/13/21 15:34:12 | 5/13/21 15:34:52 | Aziz Alfi | aziz.alfi@seattle.gov | Seattle Public Utilities | | |
| 26 | 5/14/21 9:16:12 | 5/14/21 9:17:13 | Kurt Anderson | kanderson@mitags.org | PMI | No | 1729 Alaskan Way south, Seattle, WA 98134 |
| 27 | 5/17/21 9:50:16 | 5/17/21 9:51:38 | David Grobschmit | dgrobschmit@pspilots.org | Puget Sound Pilots | Yes | 24186 N Westview Rd Mount Vernon WA 98274 |
| 28 | 5/18/21 8:50:53 | 5/18/21 8:53:17 | David Magdangal | magdangal.david@epa.gov | US EPA | Yes | 3030 Alki Ave SW, Apt 2, Seattle, WA 98116 |
| 29 | 5/18/21 14:48:58 | 5/18/21 14:50:14 | Lindsay Wolpa | lwolpa@nwseaportalliance.com | Northwest Seaport Alliance | yes | Pier 46, 401 Alaskan Way S, Seattle WA 98104 |
| 30 | 5/19/21 15:23:51 | 5/19/21 15:25:04 | David McBride | dave.mcbride@doh.wa.gov | Washington State Dept. of Health | sure | PO Box 47825, Olympia WA 98504-7825 |
| 31 | 5/21/21 9:02:30 | 5/21/21 9:03:53 | Scott Branlund | scott_branlund@outlook.com | N/A | Yes | 32811 12th Ave SW, Federal Way, WA 98023 |
| 32 | 5/21/21 12:44:45 | 5/21/21 12:45:38 | Rosie Courtney | courtney.r@portseattle.org | Port of Seattle | yes | PO box 1209, Seattle, WA 98111 |
| 33 | 5/21/21 14:54:44 | 5/21/21 14:55:14 | Angela Battazzo | abattazzo@gmail.com | Next Bold Move | Yes | 520 Occidental Ave. S # 1008 |
| 34 | 6/2/21 6:16:13 | 6/2/21 6:17:42 | Dan McKisson | danmckisson@yahoo.com | ILWU | Yes | 3440 East Marginal Way South Seattle, Wa. 98134 |
| 35 | 6/7/21 14:27:57 | 6/7/21 14:32:09 | Joel Lehn | joel.lehn@seattle.gov | Seattle Department of Construction & Inspections | yes | Seattle Dept of Construction & Inspections, PO Box 34019, Seattle WA 98124-4019 |
| 36 | 6/11/21 6:38:40 | 6/11/21 6:40:31 | Michael Coppa | mcoppa@centricbiz,com | Centric Business Systems | yes | 10702 Red Run Blvd, Owings Mills, MD 21117 |
| 37 | 6/17/21 20:29:51 | 6/17/21 20:31:16 | JOHN WELLAUER | JWELLAUER@COMCAST.NET | N/A | YES | 19803 106TH ST CT E , BONNEY LAKE WA 98391 |

U.S. Department of Homeland Security
United States Coast Guard

Commanding Officer
United States Coast Guard
Shore Infrastructure Logistics Center

1301 Clay Street, Suite 700N
Oakland, CA 94612-5203
Staff Symbol: SILC-EMD (det)
Phone: (510) 637-5541
Email: Dean.J.Amundson@uscg.mil

5090

7 May 2021

Dear Interested Party:

The U.S. Coast Guard is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. Pursuant to the National Environmental Policy Act (NEPA), and Council on Environmental Quality regulations (40 CFR §§ 1500–1508) implementing NEPA, the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate the potential effects on the environment of Proposed Action. The Coast Guard is soliciting public input as to the scope of issues, information, analyses, environmental impacts, and reasonable alternatives that should be considered in the PEIS.

Base Seattle is the largest Coast Guard facility in the Pacific Northwest and provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard missions. In addition, the replacement of the current Coast Guard ice breakers with new Polar Security Cutters, as well as possible future homeporting of other major cutters, necessitate facility enhancements to support these advanced operating assets.

Under the Proposed Action, the Coast Guard would acquire land and make improvements over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities. The Coast Guard has initially identified three reasonable alternatives for the Proposed Action. These alternatives have the following activities in common:

- Demolishing deficient buildings and consolidating their functions into a new 3-story, approximately 36,000 square foot Mission Support Building, and a new 5-story, approximately 75,000 square foot Base Administration Building.
- Rehabilitating Building 7 and a small area of Terminal 46 to meet current needs, building codes, and seismic standards, as well as other potential seismic stabilization throughout the Base.
- Upgrading the main gate of the Base and the security fencing and functions.
- Modernizing communications, electrical, natural gas, sanitary sewer, potable water, and storm sewer utilities, and realigning these utilities, as well as parking, roadways, and landscaping, to correspond with the development pattern under each of the alternatives.

The three action alternatives differ in the land proposed for acquisition, as described below.

- Under Alternative 1, the Coast Guard would acquire approximately 54.1 acres from the Port of Seattle, consisting of a currently leased 1.1-acre parcel and up to 53 acres of Terminal 46. This alternative would include acquisition of two existing berths at Terminal 46.
- Under Alternative 2, the Coast Guard would acquire approximately 21.5 acres, including a currently leased 1.1-acre parcel, approximately 5.5 acres of Terminal 46, and approximately 13.5 acres of Terminal 30 from the Port of Seattle, and two additional parcels totaling 1.4 acres. This alternative would allow for development of one new berth on current Coast Guard property and one new berth on acquired property at Terminal 30.
- Under Alternative 3, the Coast Guard would acquire approximately 24.25 acres, including a currently leased 1.1-acre parcel and 21.75 acres of Terminal 46 from the Port of Seattle, and two additional parcels totaling 1.4 acres. This alternative would include acquisition of one existing berth at Terminal 46 and allow for development of one new berth on current Coast Guard property.

The Coast Guard is soliciting input from Federal, state, and local agencies, Indian tribes, and other interested individuals and stakeholders that will help define issues to be addressed during development of the PEIS. Federal, State, Tribal, and local agencies with jurisdiction or special expertise with respect to environmental issues in the project area are also asked to participate as a Cooperating Agency with the Coast Guard in the preparation of the PEIS. More information on the Proposed Action and alternatives can be found at the Coast Guard's virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

The Coast Guard will accept scoping comments during the 45 day scoping period from May 7, 2021 to June 21, 2021. All comments should be directed to the Federal docket website at http://www.regulations.gov by searching Docket Number USCG-2021-0183 or by searching for "Base Seattle PEIS". If you cannot submit input using the Federal docket, please email BaseSeattlePEIS@uscg.mil for assistance. In your submission, please include Docket Number USCG-2021-0183. If you cannot submit comments electronically, written comments can be sent to the following address and will be uploaded unchanged to the Federal docket:

U.S. Coast Guard
Shore Infrastructure Logistics Center - EMD
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

Thank you for your consideration to the Coast Guard's Proposed Action.

Sincerely,

Dean Amundson
USCG SILC
Environmental Planning Program Manager
By Direction

U.S. Department of Homeland Security
United States Coast Guard

Commanding Officer
United States Coast Guard
Shore Infrastructure Logistics Center

1301 Clay Street, Suite 700N
Oakland, CA 94612-5203
Staff Symbol: SILC-EMD (det)
Phone: (510) 637-5541
Email: Dean.J.Amundson@uscg.mil

5090

7 May 2021

Katelynn Piazza, SEPA Regional Coordinator
Washington Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008

Dear Ms. Piazza,

The U.S. Coast Guard is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. Pursuant to the National Environmental Policy Act (NEPA), and Council on Environmental Quality regulations (40 CFR §§ 1500–1508) implementing NEPA, the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate the potential effects on the environment of Proposed Action. The Coast Guard is soliciting public input as to the scope of issues, information, analyses, environmental impacts, and reasonable alternatives that should be considered in the PEIS.

Base Seattle is the largest Coast Guard facility in the Pacific Northwest and provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard missions. In addition, the replacement of the current Coast Guard ice breakers with new Polar Security Cutters, as well as possible future homeporting of other major cutters, necessitate facility enhancements to support these advanced operating assets.

Under the Proposed Action, the Coast Guard would acquire land and make improvements over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities. The Coast Guard has initially identified three reasonable alternatives for the Proposed Action. These alternatives have the following activities in common:

- Demolishing deficient buildings and consolidating their functions into a new 3-story, approximately 36,000 square foot Mission Support Building, and a new 5-story, approximately 75,000 square foot Base Administration Building.
- Rehabilitating Building 7 and a small area of Terminal 46 to meet current needs, building codes, and seismic standards, as well as other potential seismic stabilization throughout the Base.
- Upgrading the main gate of the Base and the security fencing and functions.
- Modernizing communications, electrical, natural gas, sanitary sewer, potable water, and storm sewer utilities, and realigning these utilities, as well as parking, roadways, and landscaping, to correspond with the development pattern under each of the alternatives.

The three action alternatives differ in the land proposed for acquisition, as described below.

- Under Alternative 1, the Coast Guard would acquire approximately 54.1 acres from the Port of Seattle, consisting of a currently leased 1.1-acre parcel and up to 53 acres of Terminal 46. This alternative would include acquisition of two existing berths at Terminal 46.
- Under Alternative 2, the Coast Guard would acquire approximately 21.5 acres, including a currently leased 1.1-acre parcel, approximately 5.5 acres of Terminal 46, and approximately 13.5 acres of Terminal 30 from the Port of Seattle, and two additional parcels totaling 1.4 acres. This alternative would allow for development of one new berth on current Coast Guard property and one new berth on acquired property at Terminal 30.
- Under Alternative 3, the Coast Guard would acquire approximately 24.25 acres, including a currently leased 1.1-acre parcel and 21.75 acres of Terminal 46 from the Port of Seattle, and two additional parcels totaling 1.4 acres. This alternative would include acquisition of one existing berth at Terminal 46 and allow for development of one new berth on current Coast Guard property.

The Coast Guard is soliciting input from Federal, state, and local agencies, Indian tribes, and other interested individuals and stakeholders that will help define issues to be addressed during development of the PEIS. Federal, State, Tribal, and local agencies with jurisdiction or special expertise with respect to environmental issues in the project area are also asked to participate as a Cooperating Agency with the Coast Guard in the preparation of the PEIS. More information on the Proposed Action and alternatives can be found at the Coast Guard's virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

The Coast Guard will accept scoping comments during the 45-day scoping period from May 7, 2021 to June 21, 2021. All comments should be directed to the Federal docket website at http://www.regulations.gov by searching Docket Number USCG-2021-0183 or by searching for "Base Seattle PEIS". If you cannot submit input using the Federal docket, please email BaseSeattlePEIS@uscg.mil for assistance. In your submission, please include Docket Number USCG-2021-0183. If you cannot submit comments electronically, written comments can be sent to the following address and will be uploaded unchanged to the Federal docket: U.S. Coast Guard; Shore Infrastructure Logistics Center – EMD; Attn: Mr. Dean Amundson; 1301 Clay Street, Suite 700N; Oakland, CA 94612-5203.

Thank you for your consideration to the Coast Guard's Proposed Action.

Sincerely,

Dean Amundson
USCG SILC
Environmental Planning Program Manager
By Direction

The Seattle Times

## AFFIDAVIT OF PUBLICATION

Rita Samaniego
Wood PLC
104 W Anapamu St Ste 204A
Santa Barbara CA 93101

**STATE OF WASHINGTON, COUNTIES OF KING AND SNOHOMISH**

The undersigned, on oath states that he/she is an authorized representative of The Seattle Times Company, publisher of The Seattle Times of general circulation published daily in King and Snohomish Counties, State of Washington. The Seattle Times has been approved as a legal newspaper by orders of the Superior Court of King and Snohomish Counties.

The notice, in the exact form annexed, was published in the regular and entire issue of said paper or papers and distributed to its subscribers during all of the said period.

05/07/2021

Agent Hanh Bui Signature Hanh Bui

Subscribed and sworn to before me on 05/11/2021

Frankie Flight

(Notary Signature) Notary Public in and for the State of Washington, residing at Seattle

| | |
|---|---|
| Publication Cost: | $1234.20 |
| Order No: | 9992 |
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FRANKIE FLIGHT
Notary Public
State of Washington
Commission # 19110383
My Comm. Expires Nov 4, 2023

**NOTICE OF INTENT**
**To Prepare a Programmatic Environmental Impact Statement for Modernization of U.S. Coast Guard, Base Seattle, Washington**

The U.S. Coast Guard (USCG) announces its intent to prepare a Programmatic Environmental Impact Statement (PEIS), pursuant to National Environmental Policy Act, to evaluate the potential environmental consequences of its Proposed Action to expand and modernize Base Seattle. Notice is hereby given that the public scoping process has begun to solicit public input as to the scope of issues, information, analyses, environmental impacts, and reasonable alternatives that should be considered in the PEIS.

There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of USCG missions. In addition, replacement of current USCG ice breakers with new Polar Security Cutters, as well as possible future homeporting of other major cutters, necessitate facility enhancements to support these advanced operating assets. The USCG has developed three reasonable action alternatives, in addition to the No-Action Alternative, to evaluate in the PEIS. Alternatives involve many common facility modifications but differ primarily in proposed land acquisition.

The USCG will accept scoping comments for 45 days from May 7, 2021 to June 21, 2021. Comments and related material should be submitted to the online docket at https://www.regulations.gov/ by searching for Docket Number USCG-2021-0183 or "Base Seattle PEIS". If material cannot be submitted using the online docket, please email BaseSeattlePEIS@uscg.mil for help. Written comments can be sent to: U.S. Coast Guard, Shore Infrastructure Logistics Center-EMD, Attn: Mr. Dean Amundson, 1301 Clay Street, Suite 700N, Oakland, CA 94612-5203. Include the Docket Number USCG-2021-0183 in all submissions. All comments received will be posted without change to http://www.regulations.gov. A virtual public scoping space is available during the scoping period to assist the public in understanding the Proposed Action and providing input (https://virtual.woodplc.com/VirtualSpace/102907). Following the scoping period, a Draft PEIS will be prepared and ultimately circulated for public comment.

| | |
|---|---|
| Publication Cost: | $1234.20 |
| Order No: | 9992 |
| Customer No: | 18015 |
| PO #: | |

# Appendix D:
# NOI Scoping Comment Responses

| Comment ID | Sub ID | Comment | Comment Response |
|---|---|---|---|
| USCG-2021-0183-0002 | | I absolutely support alternative one. The USCG needs to remain long term in Seattle and the base needs to be developed with a vision to the future. | Comment Noted. Sections 1.3 and 1.4 that address modernization of Base Seattle with a vision to the future Coast Guard mission. |
| USCG-2021-0183-0003 | a | We ask to be made parties of record and receive future notices pertaining to this proposal. | Comment Noted. Added to distribution list. |
| USCG-2021-0183-0003 | b | The PEIS should have a robust parking and traffic analysis under all Alternatives, including motorized and non-motorized forms of travel. The impact to T-Mobile Park and Stadium District should be analyzed and mitigation measures should be specified. | The traffic analysis is provided for all alternatives in Section 3.4.4. Impacts to T-Mobile Park and the Stadium District are included in this discussion. |
| USCG-2021-0183-0003 | c | Land use impacts on the Stadium District and T-Mobile Park should be included in the PEIS. Both direct and indirect impacts should be identified. If there are adverse impacts to the success of the ballpark or our organization, those impacts must be identified and mitigated. | Land use impacts are addressed in Section 3.1. Additionally impacts to Recreational Resources are addressed in Section 3.13. |
| USCG-2021-0183-0003 | d | (Construction/Access) The PEIS must carefully identify construction impacts of the proposed project and all Alternatives. Impacts to T-Mobile park must be identified and mitigated. Visitors must be able to reach our site reliably. We look forward to the opportunity to work together on construction mitigation plans. | Traffic impacts are discussed for all alternatives in Section 3.4.1. |
| USCG-2021-0183-0003 | e | (Project vs. Program) The scoping notice identifies the proposal as a programmatic EIS; however, there is a specific project under consideration on a specific site. This rises to the level of a proposed action, a "tier-2" project-specific EIS. The programmatic EIS should clearly identify what the future phases of NEPA environmental review will be, as well as what the review will be under our State Environmental Policy Act. | Thank you. Comment Noted. Refer to Section 2 of the PEIS for additional information on what is or is not included in our analysis. |
| USCG-2021-0183-0004 | a | Land and space on the waterfront is too valuable for Coast Guard facilities. Sale of Port of Seattle property to the Coast Guard would be a loss of Port of Seattle real estate that likely could never be recovered. An alternative should be presented whether the Coast Guard could relocated some operations to an area less congested than in the downtown Seattle waterfront. | Comment noted. Refer to DOPAA and purpose and need for the scope of the Proposed Action. Relocation of the USCG Base Seattle is not within the project scope. |
| USCG-2021-0183-0004 | b | Coast Guard operations, as a Department of Homeland Security agency and as one of the country's six armed services, are largely incompatible with civilian activities. | Noted. See Section 1, 2 and Land Use Analysis (3.1) in PEIS . |

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| USCG-2021-0183-0004 | c | Coast Guard facilities require a level of security that is incompatible with civilian activities. Coast Guard will determine what levels of security are necessary for expanded facilities on Pier 46 without consent from citizens in Seattle. Coast Guard security extends onto the short. | Noted. See Section 1, 2 and Land Use Analysis (3.1.4) in PEIS . |
| USCG-2021-0183-0004 | d | Also concerned about possible damage to our environment in Elliott Bay during the construction of new Coast Guard facilities as well as from ongoing Coast Guard operations. | Impacts to water resources associated with proposed construction and projected operations are provided in Section 3.3.4 |
| USCG-2021-0183-0005 | a | Under Alternatives 2 & 3, the building [MITAGS] rents from the Port of Seattle would be razed, displacing their west coast campus. MITAGS urges the Coast Guard to select an alternative that does not require the school to be razed. | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0005 | b | Request the Coast Guard provide financial assistance to offset the cost of moving the school to a new location in the Seattle area, and outfitting new facilities. (Assumed this is in reference to an alternative that would require razing of the MITAG campus.) | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0006 | a | Although we support the Coast Guard's need to modernize, there needs to be some accommodation in order not to lose the school. This could be to select an option that allows the school to remain or provide financial assistance for moving the school to a nearby locations and properly outfitting the facilities. | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0007 | a | General opposition to any alternative (2 & 3) that requires closure/razing of MITAGS. | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0008 | a | Request to participate as a Cooperating Agency with the Coast Guard in preparation of the PEIS and to continue to receive information about the proposal. | Please see the introduction to Section 1 of the PEIS acknowledging WSDOT as a cooperating agency. |
| USCG-2021-0183-0008 | b | Traffic analysis should include trip generation, trip distribution, and traffic analysis, including AM and PM peak periods for the year of opening as well as design year, for proposed alternatives. | Traffic impact analysis is provided for all alternatives in Section 3.4.4. |
| USCG-2021-0183-0008 | c | Trip generation/distribution and traffic analysis should include but not be limited to: SR-99, I-90, SR 519, WSF Colman Dock Ferry Terminal. | Traffic impact analysis is provided for all alternatives in Section 3.4.4. |
| USCG-2021-0183-0008 | d | Modal analysis should evaluate effects to facilities such as the Elliott Bay Trail as well as future routes or transit stops. | Elliot Bay Trail has been addressed in the Land Use Section 3.1 and Recreational Section 3.13. |
| USCG-2021-0183-0008 | e | Modal analysis should consider how potential vehicle trip generation be mitigated through transportation demand management programming. | Traffic impact analysis is provided for all alternatives in Section 3.4.4. |

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| USCG-2021-0183-0008 | f | Modal analysis should identify different types of trips (e.g., commute, emergency response, training attendance, etc.) and evaluate the types of vehicle trips that are more conducive to substitution by other modes, such [as] via the Elliott Bay Trail. | Traffic impact analysis is provided for all alternatives in Section 3.4.4. |
| USCG-2021-0183-0008 | g | WSDOT is concerned about the cumulative effect of the development of this portion of Seattle waterfront, specifically related to the Coast Guard facility, cruise ship terminal, and other uses at Terminal 46, as well as the availability of dry dock capacity in the Puget Sound region. | Cumulative impacts have been addressed in Section 4 of the PEIS. |
| USCG-2021-0183-0008 | h | The project location is within the treaty adjudicated waters of federally recognized tribes, and the analysis should evaluate effects of treaty rights of those tribes. The Coast Guard's process should include government-to-government consultation with tribes, and WSDOT encourages the CG to engage in early and ongoing consultation to address tribal concerns. | Please see Section 3.8 Cultural Resources and Appendix I for information regarding consultation with tribes. |
| USCG-2021-0183-0008 | i | The analysis should include evaluation of construction impacts to transportation systems (including locations listed in the TRAFFIC section of this letter) as well as other multimodal transportation elements in the vicinity. | Please see Section 3.4.4 for impact analysis associated with construction of the Proposed Action. |
| USCG-2021-0183-0009 | a | General opposition to any alternative (2 & 3) that requires closure/razing of MITAGS. Letter calls for CG to fund relocation costs if necessary. | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0010 | a | EPA recommends the PEIS include information on potential impacts and necessary mitigation measures. Calls for delineation and description of the affected environment…and the nature, extent, and variables of the impacts, and proposed mitigation measures to reduce those impacts. | The PEIS includes proposed Best Management Practices (BMPs) in Appendix E and discusses application of the BMPs in context within each of the Resource Sections in Section 3. |
| USCG-2021-0183-0010 | b | Regarding Section 303(d) of the Clean Water Act, water quality, and water quality standards (WQS), EPA recommends the PEIS include information about impacted waters of the US (including the nature of the impacts and specific pollutants likely to affect those waters). | Water bodies potentially affected by the project listed on the current 303(d) list are discussed in Section 3.3.3. |
| USCG-2021-0183-0010 | c | EPA requests a description of water bodies potentially affected by the project that are listed on the State and most current EPA-approved 303(d) list. | Water bodies potentially affected by the project listed on the current 303(d) list are discussed in Section 3.3.3. |

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| USCG-2021-0183-0010 | d | EPA requests a description of existing restoration and enhancement efforts for those waters, how the proposed project would coordinate with those ongoing efforts, and any mitigation measures (to be) implemented to avoid further degradation of impaired waters. | Impacts and Best Management Practices associated with water quality are addressed in section 3.3.4 |
| USCG-2021-0183-0010 | e | EPA wants to know how the project would meet anti-degradation provisions of the CWA found in 40 CFR 131,12(a)(1)-(3). | Requirements, impacts and Best Management Practices regarding water quality are discussed in Section 3.3. |
| USCG-2021-0183-0010 | f | With regard to CWA requirements for any construction project resulting in the disturbance of one or more acres to have authorization under the construction stormwater discharge permit for industrial activities, EPA recommends the PEIS evaluate direct, indirect, and cumulative impacts from storm water discharges. | Storm water discharge is addressed in Section 3.3.4. |
| USCG-2021-0183-0010 | g | EPA requests information about how the project would meet the requirements of the National Pollutant Discharge Elimination System Prevention Plans, reporting, and monitoring. | Requirements regarding NPDES permits are discussed in Sections 3.3.3, 3.3.4, and 3.10.3. |
| USCG-2021-0183-0010 | h | If CG determines that the project will disturb areas with contaminated sediments/soils, EPA indicates additional requirements are necessary from the Washington State Department of Ecology. | The disturbance of contaminated sediments/soils is addressed in |
| USCG-2021-0183-0010 | i | EPA requests information on proposed BMPs, erosion and sediment control, and other mitigation measures to minimize impacts. | The composite list of proposed BMPs is provided in Appendix E and addressed in context in each resource section. |
| USCG-2021-0183-0010 | j | EPA requests  considerations of zero or low-impact development techniques in project design (e.g., avoiding or minimizing creation of new impervious surfaces and excavation). | Please see Section 3.7 Water Resources. |
| USCG-2021-0183-0010 | k | EPA recommends use of green construction and management practices, consistent with the federal "green" requirements and opportunities that may apply to design, operation, and maintenance of project-related facilities and equipment. | BMPs listed in Appendix E incorporate recommended construction and management practices.  The Coast Guard will consider all pertinent green construction and sustainable practices in the design of facilities. |
| USCG-2021-0183-0010 | l | EPA recommends the PEIS include description of all waters of the U.S., including project alternatives that could affect wetlands. | Waterways and wetlands related to the project area are described in Section 3.3.3. |

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| USCG-2021-0183-0010 | m | EPA requests identification of any navigable waters in the analysis area. | Navigable waters in the immediate analysis area are identified in Section 1 as the relate to the specific modernization of Base Seattle Proposed Action. |
| USCG-2021-0183-0010 | n | EPA requests data regarding acreages and channel lengths, habitat types, values, and functions of these waters. | Information regarding the features of the base and proposed alternatives is provided in Section 1 and 2, and in each of the respective resource areas in Section 3. |
| USCG-2021-0183-0010 | o | EPA requests determination of whether the project would result in discharge of dredged or fill materials into surface waters of the U.S. (triggering requirements for CWA 404 authorization from the USACE, for which EPA recommends describing the process, mitigation measures, etc.). | The CG will obtain necessary permits and perform required agency consultations prior to construction. |
| USCG-2021-0183-0010 | p | EPA requests information on mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to surface waters of the U.S. | U.S. Coast Guard Environmental Planning Implementing Procedures provides guidance on responsibilities for a mitigation monitoring program. Mitigation measures approved by the Coast Guard will be incorported in the PEIS and Record of Decision. |
| USCG-2021-0183-0010 | q | EPA requests information about floodplain impacts and actions to minimize such impacts (CWA regulates activities affecting waters of the U.S. within floodplains and Executive Order 11988, Floodplain Management addresses floodplains). | Impacts to floodplains are discussed in Section 3.3.4. |
| USCG-2021-0183-0010 | r | EPA wants information on direct, indirect, and cumulative impacts due to use of hazardous and non-hazardous materials, including description of measures to minimize the chances of accidental spills or release of pollutants into the environment, and emergency responses measures in the event a release occurs. | Potential impacts associated with hazardous materials are addressed in Section 3.11.4. |
| USCG-2021-0183-0010 | s | Address the applicability of state and federal hazardous materials, pollution prevention, and solid waste requirements, and appropriate mitigation measures to prevent and minimize the generation of solid and hazardous materials. | Impacts associated with hazardous materials, and solid waste requirements are addressed in Section 3.11.4. |
| USCG-2021-0183-0010 | t | Assess the need to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC Plan) and provide information addressing this SPCC. | The requirements for a SPCC Plan are addressed in Sections 3.3.4 and 3.11.4. |

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| USCG-2021-0183-0010 | u | Because of past and ongoing industrial uses of the project area, there is need for careful attention to potentially contaminated sites in the area that are being or have been under environmental cleanup through the federal Superfund Program and/or Washington State's Model Toxics Control Act, which includes managing sources of ongoing contamination. | Cleanup of contaminated sites is discussed in Section 1.2.2 and in Section 3.11. |
| USCG-2021-0183-0010 | v | To the extent that the project may affect other cleanup programs at the State and Federal level, coordination with USEPA R10 Superfund and Environmental Management Division, the WA State Dept of Ecology, affected federally recognized tribes, and other relevant natural resource agencies will be essential. | Cleanup of contaminated sites is discussed in Section 1.2.2 and in Section 3.11. |
| USCG-2021-0183-0010 | w | EPA recommends the PEIS include a detailed discussion of ambient air conditions (baseline/existing conditions), National Ambient Air Quality Standard (NAAQS) and criteria pollutant non-attainment areas in the analysis area and vicinity, if applicable. | The existing condition of the affected environment for air quality is provided in Section 3.5.3. |
| USCG-2021-0183-0010 | x | EPA recommends the PEIS include estimated emissions of criteria pollutants for the analysis area and discussion of the timeframe for release of these emissions from construction through the lifespan of the proposed project. For estimation of emissions, it would be helpful to specify all emission sources and quantify related emissions. | Estimated emissions of criteria pollutants are provided in the impact analysis for air quality in Section 3.5.4. |
| USCG-2021-0183-0010 | y | EPA recommends the PEIS include specific information about pollutants from mobile sources, stationary sources, and ground disturbance. | Emissions from construction and operational facilities and equipment are identified in the impact analysis for air quality in Section 3.5.4. |
| USCG-2021-0183-0010 | z | EPA recommends the PEIS include a Construction Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen (NOx). | BMPs intended to reduce construction emissions and particulates are provided in Section 3.5.7. |
| USCG-2021-0183-0010 | aa | EPA recommends the PEIS include potential effects from air pollutants, including air toxics, to: 1) workers, ground crews, nearby residents, and businesses and 2) sensitive receptor locations such as schools, medical facilities, senior centers and residences, daycare centers, and outdoor recreation areas (e.g., parks). | The analysis of air quality impacts is provided in Section 3.5.4. |
| USCG-2021-0183-0010 | bb | EPA recommends the PEIS include mitigation measures to minimize the proposed project impacts to air quality. | The PEIS does not identify any significant impacts to air quality from the proposed action. BMPs intended to further reduce the level of impact to air quality are discussed in Section 3.5.7. |

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| USCG-2021-0183-0010 | cc | EPA recommends that the PEIS identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project corridor and surrounding areas. | Please refer to Section 3.6 of the PEIS. |
| USCG-2021-0183-0010 | dd | EPA recommends that the PEIS provide information on the critical habitat for the species, impacts the project could have on the species and their critical habitats, and how the project will meet all requirements under the ESA, including consultation with the USFWS and NOAA Fisheries. | Please refer to Section 3.6 of the PEIS. CG will perform required consultations prior to construction. |
| USCG-2021-0183-0010 | ee | EPA points out that the PEIS may need to include a biological assessment and a description of the outcome of consultation with the USFWS and/or NOAA Fisheries under Section 7 of the ESA. | Please refer to Section 3.6 of the PEIS. |
| USCG-2021-0183-0010 | ff | EPA recommends that the PEIS discuss the potential for and approaches to evaluate, monitor, and manage seismic risk in the area. | The impact analysis for geological resources addresses managing seismic risk in Section 3.2.4. |
| USCG-2021-0183-0010 | gg | EPA recommends the PEIS include an updated seismic map or a reference to one. | Information regarding seismic hazards and an associated reference is provided in Section 3.2.1. |
| USCG-2021-0183-0010 | hh | EPA recommends the PEIS include information on seismic design and construction standards and practices to minimize seismic (e.g., liquefaction), landslide, and other risks. | Information pertaining to seismic stabilization and design is included in Section 2.5. The respective impact analysis is provided in Section 3.2.4 with specific BMPs provided in Section 3.2.7. |
| USCG-2021-0183-0010 | ii | EPA recommends that the PEIS identify measures to avoid and mitigate these risks. | Geological risks and potential impacts are addressed in Section 3.2. BMPs specific to geological resources are provided in Section 3.2.7 and a composite list of BMPs is provided in Appendix E. |
| USCG-2021-0183-0010 | jj | EPA points out that per a meeting held 25 March 2021, the 2020 CEQ regulations do not prevent or prohibit the analysis of indirect and/or cumulative effects. As such, the EPA encourages analyzing the project's indirect and cumulative effects to best capture impacts to human health and the environment. | Comment Noted. Cumulative Impacts have been addressed in Section 4. |
| USCG-2021-0183-0010 | kk | EPA recommends discussion of cumulative impacts as part of larger discussion of environmental impacts from the action (the environmental consequences chapter), as opposed to discussing cumulative impact analyses in a separate chapter. | Comment Noted. Cumulative Impacts have been addressed in Section 4. |

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| USCG-2021-0183-0010 | ll | In the cumulative impacts analysis, EPA recommends the PEIS identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the project area. | Cumulative impacts have been addressed in Section 4 of the PEIS. |
| USCG-2021-0183-0010 | mm | In the cumulative impacts analysis, EPA recommends the PEIS characterize these resources in terms of their response to change and capacity to withstand stresses. | Cumulative impacts have been addressed in Section 4 of the PEIS. |
| USCG-2021-0183-0010 | nn | In the cumulative impacts analysis, EPA recommends the PEIS use trends data to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components. | Cumulative impacts have been addressed in Section 4 of the PEIS. |
| USCG-2021-0183-0010 | oo | In the cumulative impacts analysis, EPA recommends the PEIS focus on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed project before mitigation. | Comment Noted. Cumulative impacts are discussed in Section 4. |
| USCG-2021-0183-0010 | pp | EPA recommends the CG consider in its decision-making the ongoing and long term risks posed by climate change regarding where associated structures should be located. | Sea level rise due to climate change in respect to the proposed action is addressed in Section 3.3 and 3.10. |
| USCG-2021-0183-0010 | qq | EPA recommends the CG consider in its decision-making (that) if such infrastructure is placed in locations of elevated risk of damages due to climate change, investments should be made to increase the resilience of infrastructure to potential impacts now and in the future. | Sea level rise sue to climate change in respect to the proposed action is addressed in Section 3.3 and 3.10. |
| USCG-2021-0183-0010 | rr | EPA recommends that the Coast Guard consider potential climate impacts to the proposed project including, but not limited to, rising sea levels, drought, high intensity precipitation events, and increased fire risk. Consideration of these issues could help avoid infrastructure investments in vulnerable locations, e.g., areas in flood zones likely to be in submerged in the future. | Climate Change is addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | ss | EPA believes the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and recommends (the CG) use the guidance when analyzing these issues. | GHG emissions are addressed in Section 3.14 of the PEIS. |

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| USCG-2021-0183-0010 | tt | EPA recommends the PEIS include an estimate of the GHG emissions associated with the project (i.e., mobilization, construction, operations, maintenance and decommissioning), qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project related GHG emissions. | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | uu | Include in the "Affected Environment" section of the PEIS a summary discussion of existing and reasonably foreseeable environmental trends related to the changing climate relevant to the project. This information will assist with identification of potential project impacts that may be exacerbated by climate change and to inform consideration of measures to adapt to climate change impacts. (Among other things, this will assist in identifying resilience-related changes to the proposal.) | Climate Change is addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | vv | Estimate GHG emissions associated with the proposal and its alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ's NEPA.gov website. For actions which are likely to have less than 25,000 metric tons of CO2-e emissions/year, provide a qualitative estimate unless quantification is easily accomplished. | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | ww | Estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the action area, as discussed in the "affected environment" section. | GHG emissions are addressed in Section 3.14 of the PEIS. |

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| USCG-2021-0183-0010 | xx | EPA does not recommend comparing GHG emissions from a proposed action to global emissions. As noted by the CEQ revised draft guidance, "[t]his approach does not reveal anything beyond the nature of the climate change challenge itself: [t]he fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." EPA also recommends that the Coast Guard does not compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a project level analysis. Consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals. | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | yy | Describe measures to reduce GHG emissions associated with the project, including reasonable alternatives or other practicable mitigation opportunities and disclose estimated GHG reductions associated with such measures. The PEIS' alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. EPA further recommends that the Record of Decision commits to implementation of reasonable mitigation measures using adaptive management practices that would reduce or eliminate project-related GHG emissions. | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | zz | Executive Order 14008 recognizes the climate crisis is profound, and directs the federal government to drive assessment, disclosure, and mitigation of climate pollution and climate-related risks. Social Cost of Greenhouse Gases (SC-GHG) estimates provide potentially useful information relevant to analyzing the impact of a project's GHG emissions. | GHG emissions are addressed in Section 3.14 of the PEIS. |

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| USCG-2021-0183-0010 | aaa | EPA recommends that the PEIS consider if the project necessitates providing estimates of the monetized damages associated with incremental increases of GHG emissions. As applicable, EPA recommends including the SC-GHG consistent with the technical support document found in EO 13990. For example, estimate the SC-GHG to conduct an analysis that incorporates the societal value of changes in carbon dioxide and other GHG emissions into benefit-cost analyses (BCA) of actions that have small, or marginal, impacts on cumulative global emissions. | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | bbb | Discuss a monetary comparison of the benefits received by society to the costs imposed on society is appropriate in evaluating a proposed project and potential alternatives. EPA recommends taking into account established practices for BCA (e.g., see Office of Management and Budget's (OMB) Circular A-4 and references therein). | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | ccc | When a BCA is conducted, use estimates of the SC-GHG that reflect the best available science and methodologies to incorporate the value to society of net changes in direct and indirect GHG emissions resulting from a proposed project (i.e., relative to a no action alternative). | GHG emissions are addressed in Section 3.14 of the PEIS. |
| USCG-2021-0183-0010 | ddd | Discuss, where it is possible, the development of a reasonable estimate of the net change in emissions due to the proposed project (e.g., that reflects how carbon-based energy production and demand from competing markets might change), then SC-GHG estimates will be useful for assessing the value to society of GHG changes in the BCA. | The estimated net change in emissions due to the proposed project is provided in Section 3.5.4. |
| USCG-2021-0183-0010 | eee | When a full BCA is not completed, SC-GHG estimates may be used for project analysis when the lead agency determines that a monetary assessment of the impacts associated with the estimated net change in GHG emissions provides useful information in its environmental review or public interest determination. Specific recommendations regarding areas of federal decision-making where SC-GHG estimates should be applied are expected from the Interagency Working Group by September 2021, as specified in EO 13990. | GHG emissions are addressed in Section 3.14 of the PEIS. |

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| USCG-2021-0183-0010 | fff | EPA recommends that the PEIS discuss how the proposed project would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity. | See Section 3.1 for land use discussions. See Section 3.8 for cultural resource discussions. |
| USCG-2021-0183-0010 | ggg | EPA recommends that the PEIS address existing constraints in the analysis area (e.g., utility rights-of-way, floodplains), and how proposed land uses are consistent and compatible with other land uses and identify any needed construction and operating permits and licenses. | Land Use is addressed in Section 3.1. Utilities are addressed in Section 3.10. Floodplains are addressed in Section 3.3 |
| USCG-2021-0183-0010 | hhh | EPA strongly recommends that the Coast Guard disclose in the PEIS the efforts undertaken to ensure effective public participation in the scoping process and throughout the NEPA analysis process. | Section 1.5 addresses public outreach with additional scoping information provided in Appendix C. |
| USCG-2021-0183-0010 | iii | If the analysis area includes low income or minority populations, the PEIS should address the potential for disproportionate adverse impacts to these populations. Refer to EOs 12898, 14008, and 13985. One tool available to locate minority and low income populations is the Environmental Justice Screening and Mapping Tool or EJSCREEN. Also consult the Federal Interagency Working Group on Environmental Justice and NEPA Committee report, Promising Practices for EJ Methodologies in NEPA Reviews for additional information, particularly on determining whether the proposed project may result in disproportionately high and adverse impacts. | Environmental Justice populations are addressed in Section 3.7. |
| USCG-2021-0183-0010 | jjj | EPA recommends that other vulnerable and disadvantaged populations, such as, the elderly, the disabled, and children, be included in the analysis. | Environmental Justice populations are addressed in Section 3.7. |
| USCG-2021-0183-0010 | kkk | EPA recommends that the Coast Guard ensure that alternatives in the environmental analyses consider environmental justice concerns and allow communities with environmental justice concerns the opportunity to participate in the decision-making process. | The Coast Guard will provide a Notice of Availability and Notice of Public Hearing through the Seattle Times and Federal Register to allow all citizens to review and comment on the PEIS. |
| USCG-2021-0183-0010 | lll | EPA encourages the Coast Guard to be aware of potential exposure pathways through surface water contact during fishing and consumption of fish. | Thank you for your comment. |
| USCG-2021-0183-0010 | mmm | EPA recommends the PEIS describe the process and outcome of government-to-government consultation between the Coast Guard and each of the tribal governments affected by the project, issues that were raised, if any, and how those issues were addressed per Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. | Section 3.8 provides information on Cultural Resources, Appendix I addresses Tribal outreach, and Appendix L includes Cultural Resources Background Information. |

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| USCG-2021-0183-0010 | nnn | The project area is a usual and accustomed fishing area for the Duwamish Tribe of Indians, the Suquamish Indian Tribe of the Port Madison Reservation, Washington, the Muckleshoot Indian Tribe, and the Confederated Tribes and Bands of the Yakima Nation. The federal government recognizes tribes as sovereign nations with fishing rights at all "usual and accustomed [fishing] grounds and stations." The term "usual and accustomed" used in treaty language refers to those areas where tribes traditionally fished before the federal government made treaties. These tribes have commercial fishing rights for salmon, shellfish, and non-salmon fish resources, as well as rights to harvest fish and shellfish for ceremonial and subsistence purposes. EPA recommends evaluating impacts to Tribal Treaty resources by describing in the PEIS all tribe's current ability, and likely ability under the action alternatives, to exercise their treaty-reserved fishing rights in their usual and accustomed grounds and stations. | Section 3.8 provides information on Cultural Resources, Appendix I addresses Tribal outreach, and Appendix L includes Cultural Resources Background Information. |
| USCG-2021-0183-0010 | ooo | Under NEPA, the PEIS must disclose any impacts to tribal, cultural, or other treaty resources. Section 106 of the NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR 800. In the PEIS, discuss how the Coast Guard would avoid or minimize adverse effects on the physical integrity, accessibility, or use of cultural resources or archaeological sites, including traditional cultural properties (TCPs), throughout the project area. Discuss mitigation measures for archaeological sites and TCPs. | Section 3.8 provides information on Cultural Resources, Appendix I addresses Tribal outreach, and Appendix L includes Cultural Resources Background Information. |
| USCG-2021-0183-0010 | ppp | EPA encourages the Coast Guard to append any Memoranda of Agreements to the PEIS, after redacting specific information about these sites that is sensitive and protected under Section 304 of the NHPA. EPA also recommends providing a summary of all coordination with Tribes and with the State and Tribal Historic Preservation Offices, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan. | Section 3.8 provides information on Cultural Resources, Appendix I addresses Tribal outreach, and Appendix L includes Cultural Resources Background Information. |

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| USCG-2021-0183-0010 | qqq | EPA recommends that the PEIS include a list of all permits/authorizations that the proposed project already has and will need including modification(s) to any existing permit or authorization, what activity and/or facility is regulated by the permit or authorization, entities that will issue each permit and authorization, when each will expire, and conditions to assure protection of human health and the environment. Such information, presented in a consolidated fashion, will assist agency decision-makers and the public in evaluating the proposed project's impacts and mitigation required to address those impacts. | Regulatory Requirements are addressed in Appendix F of the PEIS. |
| USCG-2021-0183-0010 | rrr | EPA recommends that the project design include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. EPA recommends that the PEIS describe the monitoring program and its use as an effective feedback mechanism to adjust during construction, operation, and maintenance. | U.S. Coast Guard Environmental Planning Implementing Procedures provides guidance on responsibilities for a mitigation monitoring program. Mitigation measures approved by the Coast Guard will be incorported in the PEIS and Record of Decision. |
| USCG-2021-0183-0010 | sss | EPA recommends incorporating lessons learned from past practices in developing, building and managing similar projects, combined with the need to account for new challenges, such as climate change, to help inform the design and management of the currently proposed project. | Thank you. Comment noted. Design plans and specifications will incorporate appropriate standards and requirements. |
| USCG-2021-0183-0011 | a | Under all three alternatives buildings 10, 12,1, 2 and its annex, and 6 will all be demolished. Demolition of buildings should account for building age and any hazardous materials like lead, poly-chlorinated biphenyls (PCBs) and asbestos for removal before demolition to prevent the release of these materials into the surrounding environment and waterway. | Section 3.11.4 addresses potential impacts related to hazardous materials during the proposed demolition including BMPs that are defined in Appendix E. |
| USCG-2021-0183-0011 | b | PHSKC requests that all measures possible be taken to prevent release of hazardous materials into the environment during demolition, including from fugitive dust and release to the soil and the East Waterway and Elliot Bay. We would like the draft EIS to include a description on how the demolition will be conducted so that waste that can be is recycled and toxic materials are separated out and disposed of properly. | Section 3.11.4 addresses potential impacts related to hazardous materials during the proposed demolition including BMPs that are defined in Appendix E. |

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| USCG-2021-0183-0011 | c | Given that the adjacent East Waterway will be undergoing cleanup actions in the near future, how will the CG contribute to both the cleanup and source control of the adjacent waterway and waterway sediments through each proposed alternative (assuming each alternative will be tailored to adjust for the alternative chosen in the EPA's Record of Decision for the East Waterway)? | Section 3.3.4 (Water Resources) includes a discussion on potential impacts associated with construction and operations and includes references to BMPs listed in Appendix E. |
| USCG-2021-0183-0011 | d | All alternatives describe that the Coast Guard, in conjunction with EPA, is undertaking a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action in Slip 36, including removal of contaminated sediment, source material, and removal/replacement of shoreside structures obstructing the removal action. While actions for this cleanup and source control will be included in the draft PEIS, PHSKC requests that additional information be (PROVIDED?) for areas outside of Slip 36. | See Section 1.2.2 for information on areas outside of Slip 36. |
| USCG-2021-0183-0011 | e | Besides serving as the base for the Coast guard's Pacific Northwest and Polar areas of operation, and as the homeport for several Coast Guard cutters, it is not clear what activities will take place at the site as part of daily operations. Please provide description of regular and ongoing activities will take place at the site that may impact the environment and the cleanup of the adjacent superfund site on the East Waterway. For example, will there be regular maintenance or training events, such as firefighting training, that could release chemicals at the site? Please identify sources of pollution and the actions that the Coast Guard will take to prevent additional contaminants from entering into the surrounding soil, water and air during normal operating activities at the site. | Under the Proposed Action, current types of operations will remain unchanged at USCG Base Seattle. The potential impacts and associated BMPs for each resource are discussed in Section 3. |
| USCG-2021-0183-0011 | f | All proposed alternatives include an increase in site capacity. This will likely result in increases in energy/fuel use at the site. PHSKC recommends that the Coast Guard improve energy efficiency and reduce greenhouse gas emissions while conducting this upgrade. If possible, PHSKC recommends that that the Coast Guard strive to maintain or decrease energy use/greenhouse gas emissions. This could be achieved through use of electric vehicles onsite and more energy efficient processes. | As discussed within the PEIS, new facilities will be designed and constructed to the current design standards for energy efficiency and sustainability. Many older, less efficient facilities will be demolished or renovated which will result in an overall more efficient operation. |

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| USCG-2021-0183-0011 | g | PHSKC recommends that the Coast Guard build into all proposed alternatives a description of how projected climate impacts at the site will be addressed, and how the Coast Guard will address contaminant cleanup and source control that may result from climate induced events at the site. | A discussion on sustainability is provided in Section 2.5. Cleanup actions are addressed in Sections 1.2.2 and 3.11.4 |
| USCG-2021-0183-0011 | h | Alternative 2 would involve acquisition of Terminal 30, which include[s] Jack Perry Memorial Park. This park is the only public access to the East Waterway north of the Spokane Street bridge. The description provided for Alternative 2 does not describe what will happen to this park if acquired by the Coast Guard. What mitigation will be considered if Alternative 2 is considered and public park access is lost? If the Coast Guard intends to maintain the park in the same location, will it remain publicly accessible? During the site development will the park be updated and improved? If not, does the CG have plans to move the park to another location on the waterway? | The Coast Guard plans under Alternative 2 would not include maintaining Jack Perry Memorial Park. Please refer to Section 3.1.4 for additional information regarding impacts to land use and the park. |
| USCG-2021-0183-0011 | i | Because additional parking will be added for staff at the site, and some public parking removed (depending on the alternative), we recommend that the Coast Guard provide a justification for any public parking that is lost, and propose alternatives that either maintain public parking, or provide alternatives that will allow for increased, yet convenient, public transportation to the area. | Impacts associated with land use are addressed in Section 3.1.4 and transportation (parking) are addressed In Section 3.4.4. |
| USCG-2021-0183-0011 | j | PHSKC is pleased to see that many of the existing utilities at the site will be modernized and upgraded, including the storm sewer, potable water, sanitary sewer, natural gas, electrical and communications. We encourage the Coast Guard to include thorough descriptions of these improvements in the PEIS, so that it is clear how these improvements will reduce impacts to the environment, the East Waterway, and Elliott Bay. | Comment Noted. Complete design details are not fully developed. Utilities are discussed in the Proposed Action and alternatives in Section 2 and to the extent known at this time in Section 3.10.4. Because this EIS is programmatic it is noted in Section 1 that tiering of this PEIS or a supplemental EIS may be needed as more information becomes available. |
| USCG-2021-0183-0012 | a | It appears at least one of your preferred alternatives will result in a loss of public access to Jack Perry Park. This is a vital waterfront access point for the citizens of Seattle; if public access to this area is rescinded, it must be replaced in kind or in an improved state at a nearby location. | Please refer to Sections 3.1.4 (Land Use) and 3.13.4 (Recreational Resources) for a description of impacts associated with Jack Perry Memorial Park. |

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| USCG-2021-0183-0013 | a | …suggest you incorporate public education into your project scope. Whatever rebuilding (is done) it should (include) a public education welcoming center. History displays and interactive screens could explain the range of important services the USCG provides in the Puget Sound, Gateway to Alaska, and the entire 13th District. | Thank you for your comment. At this point, a public education element has not been included within the project scope. |
| USCG-2021-0183-0013 | b | I urge you to work with the City of Seattle's Waterfront Redevelopment on integrating your project with theirs. I would love to see USCG incorporate a major artwork welcoming people to the new waterfront. This would be an opportunity to pay tribute to local Native American tribes, the first seafarers who plied these waters. | Thank you for your comment. At this point, a public education or artwork element has not been included within the project scope. |
| USCG-2021-0183-0014 | a | Thank you for your letter dated 18 May 2021 inviting government-to-government consultation on this proposed project. As acknowledged in the "Summary of Expected Impacts," each of the proposed action alternatives will likely impact Tribal cultural resources and Tribal fishing rights. In addition, each of the proposed action alternatives will likely impact water and sediment quality, nearshore habitat, and fisheries resources important to the Tribe. The Tribe welcomes the opportunity for continuous and ongoing consultation with the Coast Guard throughout the decision-making process, including further development of the action alternatives and assessment of potential impacts. | Consultations are on-going and findings will be reflected in the PEIS. Please Section 3.8 for a discussion related to cultural resources. Appendix I provides information related to tribal outreach. |
| USCG-2021-0183-0014 | b | Although the Coast Guard states that cleanup actions pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) are beyond the scope of analysis for the PEIS, such actions are consequential to the Tribe with the potential to impact resources (including cultural, fisheries, and natural resources) and treaty rights of the Tribe. The Tribe requests that the Coast Guard consult and closely coordinate with the Tribe regarding any proposed CERCLA cleanup actions and/or non-time-critical removal actions proposed under CERCLA, including, but not limited to development of an Engineering Evaluation/Cost Analysis (EE/CA). Please include the Tribe in distribution of documents, memos, or agency meetings associated with cleanup actions related to this proposed project, including, EE/CAs. | The Coast Guard will comply with all regulations and agreements for cleanup associated with CERCLA actions and will include any public notifications and consultations as required. |

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| USCG-2021-0183-0014 | c | Each of the action alternatives may include construction activities that extend outside the boundary of the East Waterway CERCLA site. Potential contamination (and sources of contamination) in areas outside the East Waterway CERCLA site (including uplands) but within the footprint of any of the action alternatives should be considered as part of the PEIS process. Such areas may require non-CERCLA cleanup or remedial actions to address potential impacts and risks, including potential impact on Tribal resources (including cultural, fisheries, and natural resources) and treaty rights. The PEIS should address impacts from potential contamination outside the boundaries of the East Waterway CERCLA site and how these activities will be coordinated with other cleanup related actions. | Areas associated with CERCLA related cleanup are discussed in Section 1.2.2 and impacts associated with Hazardous Materials and cleanup are addressed in Section 3.11.4. |
| USCG-2021-0183-0014 | d | The PEIS should address the following regarding vessels and vessel traffic at the expanded facility for each of the action alternatives: 1) Include images and sizes of vessels at their anticipated moorage locations, with discussion on the size and location-specific impacts of the vessel (shading, scour, etc.); 2) Include the anticipated number of vessel trips per year for the stationed vessels and general activity levels; and 3) Discuss any new exercises anticipated under each expansion alternative due to the increase in vessels, personnel, and/or facilities. | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |

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| USCG-2021-0183-0014 | e | The alternatives currently presented have varying degrees of impervious surfaces and overwater coverage. The Tribe anticipates that each alternative will provide a clear analysis of existing and proposed changes to impervious surfaces and stormwater management. Since each alternative includes additional or new parking areas, please include analysis of parking structures vs. surface parking. For example, the Tribe does not believe that employee parking is a water dependent use. Parking, even when in support of water dependent uses, is not a preferred use under the Washington State Shoreline Management Act. It will be important to minimize impacts from parking, along with stormwater on critical saltwater habitats in order to demonstrate consistency with the Coastal Zone Management Act (and the states Shoreline Management Act), Endangered Species Act, Marine Mammal Protection Act, Clean Water Act, and Clean Air Act. | Impacts to the resources noted are discussed in various parts of Section 3 including 3.1 (Land Use), 3.3 (Water Resources), 3.4 (Transportation), 3.5 (Air Quality), and 3.6 (Biological Resources). |
| USCG-2021-0183-0014 | f | The Tribe requests a staff level meeting to discuss details of this comment letter. The Tribe looks forward to additional communication and consultation with the Coast Guard during development of the PEIS. | Consultations are on-going. Information regarding tribal outreach is provided in Appendix I of the PEIS. |
| USCG-2021-0183-0015 | a | ...construction impacts on marine terminal activities, freight routes, rail terminal access, highway access, and gate operations for cargo should be included in the PEIS scoping. Impacts on employee access to these facilities should also be included. | Construction impacts regarding transportation and traffic are discussed in Section 3.4.4 of the PEIS. |
| USCG-2021-0183-0015 | b | The operational footprint and parking for personnel in each of the action alternatives will constrain marine cargo use, or potential use, and capacity for Terminals 46 and 30. Physical security from hazardous cargo and unauthorized persons for the facility and vessels will also have an impact (on) adjacent operations. The expanded USCG vessel operations footprint will affect capacity for cargo ships and bunkering operations in the East Duwamish Waterway. These impacts will reduce supply chain reliability for ship and shore side for USCG adjacent or near adjacent marine cargo operations. These impacts should be included in the PEIS. | Potential impacts to the issues raised are addressed in Section 3.1 (Land Use) and Section 3.7 (Socioeconomics and Environmental Justice). |
| USCG-2021-0183-0015 | c | If vessel maintenance, repair and/or rebuild will be done at the new base, what will be the impact of the above (b1)? | The type of vessel maintenance performed at Base Seattle will remain unchanged. Potential impacts associated with hazardous materials and wastes is provided in Section 3.11.4. Other resource areas would not likely be affected. |

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| USCG-2021-0183-0015 | d | What will be the impact on the above (b1) on increased activities to support CG operations (e.g., number of personnel, supply chains, medical facilities, parking, etc.) and associated vehicle counts? | Please refer to Sections 3.4 (Transportation), Section 3.7 (Socioeconomics and Environmental Justice, and Section 3.10 (Utilities and Public Services) for related impacts. |
| USCG-2021-0183-0015 | e | What will be the impact (of seismic/liquefaction risks) on USCG related operations and the ability to support ship assist operations? | Geological hazards and potential impacts are discussed in Section 3.2 of the PEIS. |
| USCG-2021-0183-0015 | f | What are the national security implications of a seismic event in any of the proposed alternatives, in comparison to a zero or near-zero risk of a seismic event at another site alternative? | Refer to Sections 1 and 2 for description of the scope and alternative screening criteria. Additional locations are not being evaluated. |
| USCG-2021-0183-0015 | g | Terminals 30 and 46 are zoned for heavy industry per the city of Seattle. If the facility will include housing, what will be the impacts on the residents of the units, and what impact will the change of use have on adjacent industrial uses/zoning and Major Truck Street capacity? | Impacts to Transportation related to the Proposed Action are analyzed in Section 3.4. |
| USCG-2021-0183-0015 | h | Building the facility in another location (e.g., Terminals [Piers] 1 and/or 2 in West Seattle or Terminal 10 [Harbor Island] in Seattle, etc.) would mitigate many of the above impacts. | Refer to Sections 1 and 2 for description of the scope and alternative screening criteria. Additional locations are not being evaluated. |
| USCG-2021-0183-0016 | a | General opposition to any alternative (2 & 3) that requires closure/razing of MITAGS. Letter calls for CG to fund relocation costs if necessary. | Comment Noted. The relocation of MITAGS is not within the scope of the Proposed Action and not addressed within the PEIS. |
| USCG-2021-0183-0017 | a | Opposition to Alternatives 2 and 3 because of potential to create further restrictions of the navigable width of the East Waterway. Proposed new berth under these alternatives would be located adjacent to busy container piers and an oil terminal on Harbor Island. Concerned about increased risks when mooring tankers and large container vessels in the waterway. Suggests Alternative 1 as the preferred, least disruptive option. | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-0018 | a | King County has facilities, the Kingdome trunk, the Connecticut regulator station, and the Connecticut stormwater return adjacent to Terminal 46. These facilities are part of the Combined Sewer Overflow (CSO) control system operated by King County WTD to reduce CSOs. King County WTD needs to have full time access to these facilities during any construction activity in the vicinity, and during eventual operation of any potential proposed adjacent facilities. (The City of Seattle owns and operates the infrastructure conveyance lines, maintenance holes, and outfalls beyond the Connecticut regulator station.) | County and City connections for utilities are addressed in Utilities Resources, Section 3.10. |

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| USCG-2021-0183-0018 | b | WTD requests that United States Coast Guard submit decisions resulting from the NEPA process so WTD can assess potential impacts. The Local Public Agency Program is available to meet with CG representatives regarding the WTD facilities and their operations. | Comment Noted. WTD will be provided additional opertunites to review and comment on information provided in the Draft PEIS. Decisions will be provided in the Record of Decision and will be made available at a later date. |
| USCG-2021-0183-0018 | c | Given that the adjacent East Waterway will be undergoing cleanup actions in the near future, how will the CG contribute to both the cleanup and source control of the adjacent waterway and waterway sediments through each proposed alternative (assuming each alternative will be tailored to adjust for the alternative chosen in the EPA's Record of Decision for the East Waterway)? | Please refer to Section 1.2.2 for a discussion on Coast Guard cleanup responsibilities. The USEPA and Coast Guard have entered into an Administrative Settlement Agreement and Order on Consent for Engineering Evaluation/Cost Analysis and Coast Guard will abide by the provisions of this agreement. |
| USCG-2021-0183-0018 | d | All alternatives describe that the Coast Guard, in conjunction with EPA, is undertaking a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action in Slip 36, including removal of contaminated sediment, source material, and removal/replacement of shoreside structures obstructing the removal action. While actions for this cleanup and source control will be included in the draft PEIS, WTD requests that additional information be included for areas outside of Slip 36. | Please refer to Section 1.2.2 of the PEIS. |
| USCG-2021-0183-0018 | e | It is unclear how the PEIS will propose to include or coordinate with sediment cleanup in areas adjacent to the alternatives presented, especially for areas that overlap with locations where sediment contamination is currently expected to be dredged and capped. | Comment Noted. Please refer to Section 1.2.2 and the scope of analysis for the PEIS provided in Section 1.3. |
| USCG-2021-0183-0019 | NA | This comment letter/submittal is corrupted but the following comment (-0020) appears to be a duplicate/replacement thereof. | See response to comment (-0020) |
| USCG-2021-0183-0020 | a | Concerned about impacts on neighborhood and historic district resources in Pioneer Square area, including additional burdens on the transportation system. Calls for the CG to consider a full range of operational and construction impacts on the neighborhood for all transportation, built, and natural environment disciplines studied in the EIS. | Please see Sections 3.4 (Transportation) and 3.8 (Cultural Resources) for applicable discussions. |
| USCG-2021-0183-0020 | b | EIS must address how the Base Seattle Expansion project will change the types of transportation trips and uses in and around the neighborhood. Comment includes concerns about climate change and GHG emissions. | Please see Sections 3.4 (Transportation) and 3.5 (Air Quality) of the PEIS. |

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| USCG-2021-0183-0020 | c | Baseline for transportation analysis must use conditions on game/ event days in the Stadium District (which take place approximately 110 days per year). | Please refer to Sections 3.4 (Transportation) and 3.13 (Recreational Resources). |
| USCG-2021-0183-0020 | d | Lengthy summary about "AWPOW" project and ongoing challenges surrounding bus traffic, etc. and concerns about contributions to congestion related to CG project. The APS says the CG's EIS must recognize conditions and commitments in the (AWPOW) EIS where applicable (e.g., related to Transportation) and address how the CG could assist the Port of Seattle to bring them to fruition, and reduce the burden additional military traffic and operations will add to the roads adjacent to Pioneer Square. | Please refer to Section 3.4 (Transportation). |
| USCG-2021-0183-0020 | e | APS asks the USCG to critically evaluate the amount of parking necessary in their proposed project, and to leverage transit options available now and in the future. | Please refer to Section 3.4 (Transportation). |
| USCG-2021-0183-0020 | f | It is essential that the EIS carefully analyze the construction impacts on transportation, parking, business and residential access, emergency services, vibration, noise, and air quality. "It is unclear how much traffic will increase during the Base Seattle Expansion project, and the EIS must study alternatives to avoid first, then minimize, traffic through Pioneer Square during construction." The EIS must carefully study potential mitigation opportunities to address the cumulative impact of this construction proceeding in the midst of other major projects. | Please refer to Section 3.4 (Transportation). |
| USCG-2021-0183-0020 | g | The Base Seattle expansion offers an opportunity to continue integrating the iconic working waterfront in with the surrounding communities. Often, the security required to support military installations can render the facilities feeling separate from the surrounding community, and can seem to fragment or separate. ...APS asks the USCG to consider the urban fabric of the surrounding neighborhoods, avoiding a project that sticks out like a sore thumb, and an expansion that further isolates the Base from its surroundings. We hope the Base Seattle expansion can deliver something that looks and feels like it belongs on the new Seattle Waterfront, at the intersection of community and industry, next to historic Pioneer Square. | ATFP and other federal building standards apply. Please refer to Section 3.1 (Land Use) of the PEIS for additional information. |

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| USCG-2021-0183-0020 | h | The scoping document indicates that [USCG] is seeking to resolve incompatible land uses as part of the expansion, and it is unclear from our initial review what that means. A more robust discussion of current and future land uses, and the codes that conflict with those uses, must be disclosed and studied in the EIS. | Please refer to Sections 1,2, and 3.1 of the PEIS for additional information. |
| USCG-2021-0183-0020 | i | The EIS should fully evaluate the construction of and future operations of the expanded Base Seattle, and seek to minimize energy and greenhouse gas emissions first, and propose ways of mitigating the remaining impacts. | The PEIS provides an analysis of potential impacts for acquisition, construction, and operations for each of the resource areas with measures to reduce or minimize impacts. |
| USCG-2021-0183-0020 | j | The EIS should study the utility needs for the project, and evaluate the impact on current utility systems and potential need to expand area utilities to support future base operations. | Please refer to Section 3.10 of the PEIS for additional information. |
| USCG-2021-0183-0020 | k | While the construction footprint of the project largely remains outside the physical boundary of the Pioneer Square Historic District, resources needed for construction and the intended use of the expanded Base Seattle will have a direct and substantial impact on the District. This federal action is required to comply with Section 106 of the National Historic Preservation Act. ...APS requests to be a consulting party to the Section 106 process for the Base Seattle Expansion projects. | Cultural Resource impacts, including Section 106 compliance, is discussed in Section 3.8 of the PEIS. |
| USCG-2021-0183-0021 | a | Opening pages summarize port history, etc. (non-comment). | No response required. |
| USCG-2021-0183-0021 | b | Because all current U.S. Coast Guard alternatives expand onto Port and NWSA-managed property, design and construction must respect the vitality and economic contributions of the maritime and industrial economic sectors. The proposed modernization has the potential to impede existing industrial capacity and capability and could foreclose future industrial facilities and operations. Port maritime and NWSA facilities cannot be moved or replicated elsewhere, due to their very nature, and impacting their operations jeopardizes a significant economic and employment engine for the region and state. | Please refer to Section 3.7, Socioeconomics and Environmental Justice, of the PEIS for additional information. |

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| USCG-2021-0183-0021 | c | Alternative selection for Base modernization must be mindful of the fact that relocation of maritime businesses is very difficult, and in some cases impossible. In keeping with the comments above, the Port and NWSA propose integrating the following into the purpose and need as well: Recognize other critical public institutions and purposes by partnering effectively to plan, deliver, and operate the project in a manner that is compatible with existing and planned economic development uses along the Maritime Industrial Waterfront and the freight infrastructure supporting them. | Thank you for your comment. The purpose and need for this document remains focused on Coast Guard proposed actions. The analysis in Section 3 resource areas identifies the potential impacts and proposes mitigation measures to minimize impacts to resources and other potentially affected entities. |
| USCG-2021-0183-0021 | d | Not a true scoping comment, but important information to cross-reference with existing descriptions to ensure the PEIS accurately describes Port facilities. | Comment Noted. |
| USCG-2021-0183-0021 | e | The NEPA document explicitly discusses acquiring land. Please clarify in the Alternatives Analysis why long-term lease options are not feasible. | Please refer to Sections 1 and 2 of the PEIS for a description of the proposed action and screening criteria for alternatives. |
| USCG-2021-0183-0021 | f | The text describing Alternative 1 contemplates acquiring up to 53 acres of Terminal 46. However, the exhibit is showing approximately 30 acres on Terminal 46. Please clarify the Alternative description or show the additional proposed acreage. | The text and graphics have been reconciled to reflect a proposed acquisition of approximately 28 acres for Alternative 1 and provided in Section 2.5.1. |
| USCG-2021-0183-0021 | g | Alternative 2 discusses acquiring up to 13.5 acres of Terminal 30 and three adjacent parcels. This area, along with two of the three adjacent parcels, is called Pier 34 and includes Jack Perry Park. The actual property extent of Terminal 30 begins directly south of the proposed acquisition area. The entrance to Terminal 30 and 25 is within the City-owned Alaskan Way right-of-way, which is the southern extent of the proposed property acquisition. | The description of the portion of Terminal 30 property proposed for acquistion under Alternative 2 has been updated and provided in Section 2.5.2. |
| USCG-2021-0183-0021 | h | Alternative 3 describes acquiring up to 21.75 acres of Terminal 46 and two adjacent parcels. It appears the acquisition area also includes parts of Pier 34 (Jack Perry Park and one of the adjacent parcels), but potentially avoids the City-owned Alaskan Way right-of-way. | The updated description of property proposed for acquisition under Alternative 3 is provided in Section 2.5.3. |

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| USCG-2021-0183-0021 | i | To the extent the PEIS assumes acquisition rather than long-term lease, the Port asks that the PEIS fully identify and disclose the economic and other impacts of displacing difficult-to-replace maritime industrial functions (and a public access park) from the Seattle waterfront. Namely: Pier 34 Dolphins, MITAGS, Jack Perry Park, and Cargo Operations. | Impacts associated with land use and socioeconomics are provided in Sections 3.1.4 and 3.7.4, respectively. |
| USCG-2021-0183-0021 | j | please provide analysis of effects on the City's regionally- and locally designated MICs and state-regulated shorelines, and potential to protect and improve access conditions for these industrial areas. Evaluate the land use implications considering the essential public facilities designation in the GMA. Particularly evaluate potential for loss of essential industrial zoned area, that is, area built and committed to industrial and marine industrial use. Analysis should include the potential for impacts on industrial lands or businesses to induce acquisitions, displacements, and relocations. | Please refer to Section 3.1 of the PEIS for additional information regarding land use. |
| USCG-2021-0183-0021 | k | Analysis and evaluation must also include impacts to public shoreline access. If the U.S. Coast Guard redevelops Jack Perry Park, the U.S. Coast Guard would need to identify a location to replace the required shoreline access. | Because Jack Perry Memorial Park is not a U.S. Government-owned property, the Coast Guard cannot determine a location to replace the required shoreline access. |
| USCG-2021-0183-0021 | l | The project must not interfere with our ability to accomplish our public sector mission. The Port and NWSA have concerns about possible negative economic effects resulting from unmitigated impacts to businesses which could also affect supporting or related businesses in the maritime, seafood, cruise, or industrial economic sectors. This includes direct job losses through marine cargo and longshore operations, as well as situations where a port terminal is anchoring nearby supplier businesses, such as the Seattle International Gateway railyard of Burlington-Northern Santa Fe (BNSF). | Please refer to Section 3.7 of the PEIS for additional information regarding Socioeconomics. |
| USCG-2021-0183-0021 | m | Analysis should include the interdependencies of industrial and maritime businesses and the dependency on water access. This includes the potential displacement of the Pier 34 dolphins and the impact to barge fueling operations. | Please refer to Section 3.7 of the PEIS for additional information regarding Socioeconomics. |
| USCG-2021-0183-0021 | n | All alternatives will impact ingress and egress from NWSA container terminals. The EIS should evaluate potential negative impacts to the truck entrance and gate systems and identify solutions. | Please refer to Section 3.4 of the PEIS for transportation related potential impacts. |

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| USCG-2021-0183-0021 | o | The EIS should consider potential impacts to waterside navigation at Terminal 46, Pier 46 and along the East Waterway, as well as potential impacts to cargo mobility, and explore options to mitigate potential adverse impacts. | Please refer to Section 3.4 of the PEIS for transportation related potential impacts. |
| USCG-2021-0183-0021 | p | The addition of a significant number of new parking spaces on base will likely generate a significant number of new vehicle trips to the facility. The EIS should carefully evaluate the impact on, and mitigation measures to address these new trips, especially given the surrounding communities' focus on minimizing single occupancy vehicle trips. | Please refer to Section 3.4 of the PEIS for transportation related potential impacts. |
| USCG-2021-0183-0021 | q | (The) new Base entrance on the south-west corner of the Alaskan Way and Atlantic Street intersection appears to introduce what is essentially a new leg for the signalized intersection with (the) bike path. This has the potential to overwhelm the capacity of the existing intersection, signal system, and create a significant safety risk.The EIS will need to take a close look at these impacts and determine the feasibility of the proposed driveway. | Please refer to Section 3.4 of the PEIS for transportation related potential impacts. |
| USCG-2021-0183-0021 | r | Potential increases in Base traffic associated with a significant amount of new parking could affect area traffic, and in particular along the Atlantic Street corridor and the recently constructed South Atlantic Overpass (known locally as "the little h"), East Marginal Way, and Alaskan Way to Dearborn, potentially to the I-5 and I-90 ramps. This could be compounded by the proposed new entry gate at the Terminal 46 entrance at the Alaskan Way and S Atlantic Street intersection. The EIS needs to carefully analyze the potential for increased congestion and determine potential mitigation. | Please refer to Section 3.4 of the PEIS for transportation related potential impacts. |
| USCG-2021-0183-0021 | s | The Portside Trail is a separated pedestrian sidewalk and striped bicycle path, with a combined width of approximately 12 feet, parallel to the Terminal 46 perimeter fence. Jack Perry Park is located at the northern edge of Pier 34. Please ensure a complete analysis of potential impacts on these facilities. | Please refer to Section 3.13 of the PEIS for recreational related potential impacts. |
| USCG-2021-0183-0021 | t | The Port maintains many structures that are over 50 years old. Please coordinate with the Port to ensure a complete analysis of potentially eligible structures. | Please refer to Section 3.8 of the PEIS for cultural resources related potential impacts. |

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| USCG-2021-0183-0021 | u | (Port) facilities have been constructed in filled former shoreline and shallow-water aquatic areas, used historically for non-port related marine industrial uses and activities, or occupied for other purposes. Construction has the potential to disrupt significant historical and cultural resources and requires detailed analysis and evaluation. | Please refer to Section 3.8 (Cultural Resources) of the PEIS for additional information. |
| USCG-2021-0183-0021 | v | In-water construction and near-water operations in multiple areas has the potential to affect Treaty fishing access, an existing condition the Port and NWSA are committed to maintaining and improving, in partnership with the Muckleshoot Indian Tribe and the Suquamish Tribe. | Please refer to Section 3.8 (Cultural Resources) of the PEIS for additional information. Additionally, Appendix I includes information related to tribal consultations. |
| USCG-2021-0183-0021 | w | Please include potential for contaminated soils affecting groundwater conditions where construction impacts are expected. This can be from upland or in-water construction. | Please refer to Section 3.3 (Water Resources) of the PEIS for additional information. |
| USCG-2021-0183-0021 | x | Terminal 30, Pier 34, and Terminal 46 encompass a mix of Port and City-owned stormwater facilities which are managed by the Port's stormwater utility and the City's stormwater utility, respectively. Alternatives should consider the implications of bisecting existing stormwater basins and how to design the modernized and expanded base to separate stormwater flows. This project may trigger stormwater treatment obligations. Treatment types may need evaluation. | Please refer to Section 3.3 (Water Resources) of the PEIS for additional information regarding stormwater. |
| USCG-2021-0183-0021 | y | Please translate passenger vehicle and freight transportation changes during construction and operation into effects on air quality and greenhouse gas emissions. Effects to consider may include, but not be limited to, the potential for increased emissions from truck idling due to congestion or at-grade crossings, temporary changes in vessel at-berth operations or while maneuvering, and potential delays in port operations and effects on cargo handling equipment idle times, etc. Please also provide expected impacts on both air quality and greenhouse gas (GHG) emissions (CO2) associated with the construction process and with the completed modification and expansion of U.S. Coast Guard Base Seattle, noting all measures taken to minimize negative impacts on air quality and GHG emissions. The PEIS should consider a full range of emissions (including buildings, transportation, equipment, and vessels) under each of the alternatives. | Please refer to Section 3.5 for a discussion on Air Quality and associated impacts from the Proposed Action. |

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| USCG-2021-0183-0021 | z | The PEIS should consider the U.S. Coast Guard's energy utility needs moving forward along with other growing demands on the power utility infrastructure in the area, inclusive of existing planning efforts well underway. This will help ensure that the capacity is not fully tapped and preclude other users from making improvements to support electrification and capacity improvements. | Section 3.5.4 notes that the Coast Guard is the programmatic level of planning and design details are not yet developed. |
| USCG-2021-0183-0021 | aa | For this potential new use, power requirements, especially those that would go above existing use like new shore power for vessels at berth, should be considered including impacts relative to Seattle City Light's electrical distribution system and impacts to the availability of power for adjacent sites. It is our understanding that the utility's electrical distribution in the vicinity is significantly constrained, especially when projected future uses are considered. The Port and NWSA are currently engaged in a planning process with Seattle City Light and we highly recommend a joint investigation of power requirements, availability, and synchronization with other needs between the U.S. Coast Guard, NWSA, Port, and Seattle City Light. | Section 3.5.4 notes that the Coast Guard is the programmatic level of planning and design details are not yet developed. This section also states that infrastructure improvements would support future homeported cutters that would receive power from landside generators. |
| USCG-2021-0183-0021 | bb | The Port and NWSA are currently considering the vulnerability of critical infrastructure, including risks associated with climate change, transportation, flooding, and power reliability, among other considerations. As it relates to electrical power, given the identified distribution system constraints coupled with a significant anticipated increase in reliance on electrical power to serve new load types and quantities as well as an increase in system modernization and complexity, the PEIS should take into consideration resilience with the proposed project alternatives and potential impacts to and shared strategies with neighboring port facilities served by the Seattle City Light system. | Utilities are addressed in Section 3.10 of the PEIS. |
| USCG-2021-0183-0021 | cc | The area is comprised of historic landfilling in shallow intertidal aquatic area sediments, with shallow ground-water conditions. The geological condition in this area is very complex and will require detailed evaluation. | Please refer to Section 3.9 for a thorough discussion on Geological Resources. Water Resources are addressed in Section 3.3. |
| USCG-2021-0183-0021 | dd | Any U.S. Coast Guard project completed within the East Waterway must not preclude any cleanup activities or increase the costs of completing them. | Comment Noted. See Section 1.2.2 for a description of cleanup elements. |

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| USCG-2021-0183-0021 | ee | Expanding the Base's landside footprint and adding berth capacity on the waterside on existing NWSA terminals will require expansion of U.S. Coast Guard's security perimeter and the U.S. Security Zone on the waterside. The EIS should evaluate potential impacts on Port/NWSA facilities that would enable the Port/NWSA to maintain full operational functionality (e.g. maintaining the leads for existing tie-offs, preventing the need to short lead), while also considering concurrent impacts to navigation and the Usual and Accustomed fishing area for the Muckleshoot Indian Tribe and Suquamish Tribe. The waterway is already somewhat constrained, and the impacts of additional vessels, security zones, and berthing time should be considered in coordination with all users. | Potential impacts for items noted in the comment are addressed in Sections 3.1 (Land Use), 3.4 (Transportation), and 3.8 (Cultural Resources). |
| USCG-2021-0183-0021 | ff | …evaluation of the modernization and expansion of U.S. Coast Guard Base Seattle on the Port/NWSA federally required security zones at Terminal 30, Pier 34, and Terminal 46 facilities is essential. This includes impacts of the expansion on gate access, security perimeters, and vessel operations. We ask that the CG engage the Port/NWSA on this analysis as appropriate if there is any potential for overlap between U.S. Coast Guard and Port/NWSA security zones. | Security fencelines and access are addressed throughout the PEIS in various sections. |
| USCG-2021-0183-0021 | gg | Analysis should include potential effects, including transportation and air quality, on the Duwamish Valley and Chinatown/International District communities. This should include community bifurcation, changes in circulation patterns to and from public services and amenities, and changes to emergency service response times during construction and due to altered structures and routes following completion. | Section 3.5 provides an analysis of potential air quality impacts associated with the Proposed Action. Additionally, transportation impacts are addressed in Section 3.4, and Land Use impacts are provided in Section 3.1. |
| USCG-2021-0183-0021 | hh | Construction activities on Port/NWSA facilities have the potential to affect operations, transportation, and access/egress in and around the facilities and surrounding communities. It will be important to understand these impacts and identify appropriate mitigation measures in the EIS. | Proposed Coast Guard construction impacts related to this comment are provided in Sections 3.1.4 (Land Use) and 3.4 (Transportation). |
| USCG-2021-0183-0021 | ii | Please evaluate all elements of the environment for cumulative impacts from direct and indirect development, over time. The Port and NWSA make long-term investments for public purpose and will provide to you our planned capital improvement projects. | Cumulative impacts are addressed in Section 4 of the PEIS. |

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| USCG-2021-0183-0022 | a | The waterfront business district and the east/west arterials connecting downtown to both Pioneer Square and the stadiums has been the subject of extensive planning. The Seattle Comprehensive Plan is a key resource for your office to consult in this analysis. How will the USCG integrate those existing planning documents, specifically their focus on walkability, an inviting streetscape, visual and physical access along this waterfront into the USCG's decision making process? | Please refer to Section 3.1 (Land Use) for a discussion on land use plans. |
| USCG-2021-0183-0022 | b | Ensuring the continuation of the working waterfront with productive maritime and industrial businesses that support livable, family-wage jobs is a key planning objective to the City of Seattle. How will the PEIS analyze this interconnected issue of maritime industrial land use impacts and the workforce it supports? | Please refer to Sections 3.1 (Land Use) and 3.7 (Socioeconomics and Environmental Justice) of the PEIS for additional information. |
| USCG-2021-0183-0022 | c | The City is committed to accommodate pedestrians, cyclists, heavy freight, rail and passenger vehicles all within this confluence of arterials and highways that abut each of the proposed alternatives. Our partners in the Seattle Department of Transportation (SDOT) and the Office of Planning and Community Development (OPCD) are eager to consult with you regarding the planning work already completed and to offer insight into the vision for transportation that is still evolving. A key question to resolve will be, what new transportation and utility infrastructure is needed to support the base? Are there opportunities to support and improve mobility for all stakeholders in these key rights of way? | Please refer to the Section 2 for proposed project design information (e.g. new transportation and utility infrastructure needed). |
| USCG-2021-0183-0022 | d | The SDCI has committed to this goal beyond just policy and incorporated requirements into our code that prohibit most fossil fuel use and require on-site renewable energy generation. Will the USCG be able to mirror this commitment in its development of the base? | The Coast Guard will consider renewable energy sources in site and facility designs and will comply with the current design standards and goals for federal facilities. |
| USCG-2021-0183-0023 | a | All members of the community in and surrounding the project area need to be included in the scoping process. The scoping of this project should give consideration to how this project will impact marginalized communities and consider how those impacts can be mitigated to ensure there is no unfair distribution of harm to these communities. | Substantive public comments received during the scoping period have been incorporated into the Draft PEIS. The public review period for the publicly released Draft PEIS will include an additional opportunity for citizens to provide comments. Impacts to marginalized communities are evaluated in Section 3.7.4 of the PEIS. |

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| USCG-2021-0183-0023 | b | We would expect some greenhouse gas (GHG) emissions to occur during the construction phase due to fuel combustion in on-road and off-road mobile sources and heavy equipment. While we would not expect these construction GHG emissions to be significant, we recommend that they be disclosed. | Emissions associated with construction and with operations are discussed in Section 3.5.4 of the PEIS. |
| USCG-2021-0183-0023 | c | We also expect the operation of the expanded and modernized facilities to impact GHG emissions, with expansion increasing GHG emissions and modernization likely increasing efficiency and reducing relative GHG emissions. We recommend that operational GHG emissions be included in the evaluation for the potential for increased emissions. | Emissions associated with construction and with operations are discussed in Section 3.5.4 of the PEIS. |
| USCG-2021-0183-0023 | d | (The CG) must evaluate all federal activities, such as development projects, to determine whether the activities have reasonably foreseeable effects (the effects test) to Washington's coastal uses and/or resources. If the Coast Guard determines that there are such effects, then it must prepare a complete federal consistency determination and submit it to Ecology no less than 90 days prior to the Coast Guard's "final action" on the project. Ecology has 60-75 days to issue a decision. | A Coastal Zone Management Act Consistency Determination has been provided in Appendix G of the PEIS. |
| USCG-2021-0183-0023 | e | …if the project will affect eelgrass beds on Coast Guard property, those effects may result in impacts to species such as salmonids, which use the eelgrass for habitat and foraging. | Please refer to Section 3.6.4 (Biological Resources) for a discussion of location of eelgrass within Puget Sound and Elliot Bay. |
| USCG-2021-0183-0023 | f | The Coast Guard's consistency determination must include a full discussion of all of the applicable enforceable policies of Washington's CZMP. Those include policies in the Shoreline Management Act, the Washington Clean Air Act, and the Water Pollution Control Act and those Acts' implementing regulations. | A Coastal Zone Management Act Consistency Determination has been provided in Appendix G of the PEIS. |
| USCG-2021-0183-0023 | g | Depending on the scope of the project and whether there is a discharge to waters of the state, a Section 401 Water Quality Certification may be required for the proposed activity. | Water quality has been addressed in Water Resources, Section 3.3, and in Biological Resources, Section 3.6. |

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| USCG-2021-0183-0023 | h | Southern Resident Killer Whales (SRKWs) along with other threatened and endangered species may be present within the project area and within the shipping routes that vessels calling to the base will utilize. (The PEIS should consider) changes in vessel traffic along shipping routes to and from the base. Potential impacts include underwater noise pollution, vessel strikes, and a major spill incident. (The PEIS should include) measures to mitigate vessel traffic impacts to SRKWs (and determine) the impact of construction activities and measures to mitigate these impacts to SRKWs. | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-0023 | i | The PEIS should include a transportation study regarding the impact of changes in vessel traffic. While the proposed expansion does mention the addition of three Polar Security Cutters and four additional major cutters, the study should include all projected changes in vessel traffic and capacity under the proposed action and three alternatives. | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-0023 | j | An assessment of how this project will impact tribal resources in the project area during construction and operation should be considered. Potential areas to consider include: 1) how will changes in vessel traffic impact tribal fishing areas in terms of safety, access, and spill risk?; and 2) how will changes in vessel traffic impact availability of tribal fishing areas during fishing season with high trafficked navigation channels? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-0023 | k | Ensure Federally Recognized Tribes in the project area are consulted during the PEIS scoping, drafting, and project approval process. This should be a collaborative and inclusive process. | Comment Noted. Tribal consultation is ongoing and information is included in Appendix I. |
| USCG-2021-0183-0023 | l | The PEIS scope should include an analysis regarding the risk of potential oil spills and what prevention, preparedness, and response measures will need to be in place to mitigate this risk. Areas of risk for oil spills include: 1) Vessel transportation, including changes in oil spill risks due to changes in vessel traffic under the proposed action and alternatives; 2) Operation and construction standards; 3) Equipment design and maintenance; and 4) Continual staff training and overlap in training during staff turnover. | For actions within the scope of this PEIS (does not include vessel transportation), impacts associated with potential oil spills are addressed in Section 3.3 (Water Resources). |
| USCG-2021-0183-0023 | m | The PEIS scope should consider how sea level rise could impact the base and how the base will safeguard against sea level rise. | Sections 1 and 2 address considerations for sea level rise and appropriate design considerations. |

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| USCG-2021-0183-0023 | n | In order to assess the full scope of impact that this project approval will have, the PEIS needs to expand the scope of the project area to include shipping routes for vessels calling to the base during construction and operation. | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-0023 | o | The Toxics Cleanup Program expects the PEIS to include a discussion of areas of contamination and how they might impact the project area for all identified state cleanup sites on the existing Coast Guard property and on the adjacent properties where land acquisition might occur. From our records, this includes: CG Base, Terminal 30, and Terminal 46. | Please refer to Sections 1.2.2 and 3.11 (Hazardous Materials and Wastes) of the PEIS for additional information. |
| USCG-2021-0183-0023 | p | We would also encourage an evaluation of cleanup sites identified on nearby properties, to determine if contamination from these sites has not migrated into the project area. Based on proximity, evaluated sites might include the following, and may also include other sites not listed here: Emerald City Disposal Massachusetts, Federal Warehouse, WA DOT South Atlantic Street, GATX Tank Storage Terminal, and SR 519 Street Improvement. | Please refer to Sections 1.2.2 and 3.11 (Hazardous Materials and Wastes) of the PEIS for additional information. |
| USCG-2021-0183-0023 | q | The PEIS should include a discussion of how soil, groundwater, sediment, and/or soil gas at the project location will be characterized and remediated if necessary to ensure protection of workers and mitigation of Model Toxics Control Act (MTCA) liability. Depending on the overlap of the project alternative areas with existing contamination, we expect the discussion may include plans for one or more of the following: 1) Specific health and safety requirements for workers who may encounter contaminated media during construction or operations; 2) Removal and proper disposal of contaminated soil, groundwater, and sediment from the project area; 3) Construction of a cut-off wall to prevent contaminated groundwater from flowing into the project area; and 4) Vapor intrusion controls for the new buildings, such as a vapor barrier or sub-slab depressurization system. | Please refer to Sections 1.2.2 and 3.11 (Hazardous Materials and Wastes) of the PEIS for additional information. |

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| USCG-2021-0183-0024 | a | (The Tribe's) usual and accustomed grounds and stations include...Elliott Bay, the Duwamish Waterway, the East Waterway, and West Waterway. Coast Guard Base Seattle is located within the Tribe's usual and accustomed fishing grounds and stations...it is extremely important that the Coast Guard consults directly with the Tribe, and works directly with the Tribe to avoid or minimize these potential impacts. Both of the areas discussed in the Action Alternatives (Terminal 30 and Terminal 46) have been historically and actively used by Tribal fishers. The Coast Guard should specifically identify proposed moorage locations associated with each of the three Action Alternatives, including information regarding the size of each moorage location, seasonal use of the moorage locations, and any security zones or other regulations that would impact the ability of Tribal fishers to continue to utilize these Terminals for Treaty fishing. | Please refer to Section 3.6 (Biological Resources) of the PEIS for additional information. |
| USCG-2021-0183-0025 | a | Support the Coast Guard's need to modernize, there needs to be some accommodation in order not to lose the school. This could be to select an option that allows the school to remain or provide financial assistance for moving the school to a nearby locations and properly outfitting the facilities. | Comment Noted |
| USCG-2021-0183-XXXX | a | ...we are increasingly concerned by a further off goal that this project seems to be promoting, increased human presence in the arctic. We request that analysis of how this project will contribute to impacts in the increasingly threatened arctic be included in this PEIS... It should therefore be analyzed and shared what the direct, indirect, and cumulative impacts of this bolstered presence could be. | Comment Noted. Previously evaluated under PEIS for polars. |
| USCG-2021-0183-XXXX | b | How will this increase militarization in the arctic? | Comment Noted. Previously evaluated under PEIS for polars. |
| USCG-2021-0183-XXXX | c | How will increased arctic operations contribute to melting glaciers via black carbon? | Comment Noted. Previously evaluated under PEIS for polars. |
| USCG-2021-0183-XXXX | d | Will the operations originating from the Project be used in any way related to fossil fuel or mining exploration or extraction? | Comment Noted. Previously evaluated under PEIS for polars. |
| USCG-2021-0183-XXXX | e | How does the Coast Guard plan to address the pier’s potential for liquefaction in the design of their facility? | Geological hazards and potential impacts are discussed in Section 3.2 of the PEIS. |

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| USCG-2021-0183-XXXX | f | What will be the timing of construction? | Please refer to Section 1.3 for a description construction timeline. Additional discussion on the Proposed Action is provided in Section 2.4. |
| USCG-2021-0183-XXXX | g | Will construction be planned to avoid increased pollution during times of animal/sea life migration? | Please refer to Section 3.6 of the PEIS for additional information on biological resources. |
| USCG-2021-0183-XXXX | h | How will construction and the commuting of workers affect local traffic times and pollution levels? | Please refer to Sections 3.4 (Transportation) and 3.5 (Air Quality) of the PEIS for additional information |
| USCG-2021-0183-XXXX | i | Construction impacts will include development of the site and moving material to the site. What is the planned method for delivering construction equipment? (And, does this change with a particular action alternative?) | Please refer to Section 3.4 (Transportation) of the PEIS for additional information. |
| USCG-2021-0183-XXXX | j | Which communities will be impacted? | A discussion of impacted communities is provided in Section 3.7 (Socioeconomics and Environmental Justice). |
| USCG-2021-0183-XXXX | k | How will the facility receive fuel in its planned location? | No change from existing conditions. |
| USCG-2021-0183-XXXX | l | How will construction and fuel delivery increase harmful pollutants for neighborhoods already experiencing worse than average air quality on the health disparities map? | Please refer to Section 3.5 (Air Quality) of the PEIS for additonal inforamtion |
| USCG-2021-0183-XXXX | m | Will the environmental impacts from ships traveling to and from Seattle Base be analyzed along the corridor they use out of Puget Sound/Salish Sea? (e.g., there should be analysis of light and sound pollution impacts on both the local ecosystems ships will pass and on local communities). | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-XXXX | n | What will be the plan for vessels bound for Seattle Base if shipping traffic prevents them from reaching their destination? Will there be backup locations for ships to wait? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-XXXX | o | What regulations will ships follow to prevent the transmission of invasive species? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-XXXX | p | Will increased ship traffic impact local commercial/tribal fishing? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |

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| USCG-2021-0183-XXXX | q | Will ships be cleaned before entering Puget Sound? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-XXXX | r | Will there be any Sonar use at the facility, and how would the coast guard plan on responding should there be a mass stranding of citations (sic) correlated with use of active sonar? | Comment noted. Vessel traffic is associated with Homeporting actions and not within the scope of this modernization PEIS. Please see Section 1.3 for a description of the scope of this PEIS. |
| USCG-2021-0183-XXXX | s | What will be the sources of acoustic pollution? How frequently and intensely will these impacts occur? | In regards to in-water acoustics, vessel traffic associated with Homeporting actions is not within the scope of this modernization PEIS. Construction and operations related noise impacts are addressed in Section 3.2. |
| USCG-2021-0183-XXXX | t | Will there be any runoff from ships or the facility as a result from construction or during routine activities? | Please refer to Section 3.3 (Water Resources) of the PEIS for additional information. |
| USCG-2021-0183-XXXX | u | What will be the energy source for the ships and buildings? What will be the emissions resulting from this energy (accounting for the full life cycle of fuels like liquefied natural gas using best available science)? | Design details for energy sources for new facilities have not yet been developed. The Coast Guard will abide by current design and sustainability standards at the time of design. |
| USCG-2021-0183-XXXX | v | What will be the sources of light pollution from this site, and how will they impact marine life, wildlife, birds, humans? | Please refer to Section 3.6 (Biological Resources) of the PEIS for additional information. |
| USCG-2021-0183-XXXX | w | How will this facility and its operations affect any endangered or critical species? | Please refer to Section 3.6 (Biological Resources) of the PEIS for additional information. |
| USCG-2021-0183-XXXX | x | We urge that anything related to this Project that falls under the purview of tribal consultation or involvement include the Duwamish Tribe, who have cared for the lands and waters where the Project is located since time immemorial, in addition to federally recognized tribes. | Comment Noted. Tribal consultation is ongoing and information is included in Appendix I. |
| USCG-2021-0183-XXXX | y | It is stated that the “Proposed Action is programmatic in nature and specific projects are anticipated to occur over the next decade.” However, the proposed alternatives seem to outline specific property acquisitions, specific constriction propositions, and even equipment upgrades. This begs the question, what specific projects will take place over the next decade? | Please refer to Sections 1 and 2 (DOPAA) of the PEIS for additional information. |

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| USCG-2021-0183-XXXX | z | In order to fulfill (its) obligation (under NEPA), does the Coast Guard plan on issuing supplemental environmental analyses to support this Programmatic Environmental Impact Statement? | As noted in Section 1 of the PEIS, the Coast Guard may prepare a document tiering from this PEIS or prepare a supplemental NEPA document as determined necessary and appropriate. |
| USCG-2021-0183-XXXX | aa | If additional, in depth environmental analyses are not planned, then this PEIS should instead take the form of a detailed EIS, which will clearly detail the environmental impacts from all reasonably foreseeable activities. | As noted in Section 1 of the PEIS, the Coast Guard may prepare a document tiering from this PEIS or prepare a supplemental NEPA document as determined necessary and appropriate. |
| USCG-2021-0183-XXXX | bb | Will this facility be used to support any weapons testing, warfare training activities, naval training, or active sonar testing? What would be the impacts to human health, levels of noise pollution, impacts to marine life that use sonar? Impacts to birds? | Future types of training occurring at Base Seattle will be consistent with current operations. |
| USCG-2021-0183-XXXX | cc | Will this facility be used to house any vessels other than those outlined in the request for scoping comments? | This PEIS is focused on the expansion and modernization of the base to accomodate the potential for the new ships and all resource impact analyses reflect the presence of the existing complement and potential addition of new polar security cutters as discussed in Section 1. |
| USCG-2021-0183-XXXX | dd | Will there be maintenance of the vessels docked at this facility (e.g., cleaning the ships) and what will be the potential environmental impacts from that? | Pier side maintenance functions will remain the same as currently performed at Base Seattle. |
| USCG-2021-0183-XXXX | ee | Will there be any toxic/hazardous/volatile compounds or items stored at this facility, including fuels? What are the health impacts? | There are no known or planned new hazardous materials or wastes at Base Seattle as a result of the proposed action. Please refer to Section 3.11 (Hazardous Materials and Wastes) of the PEIS for additional information. |
| USCG-2021-0183-XXXX | ff | What are the potential safety concerns for surrounding communities in the event of a catastrophic incident like explosion or liquefaction caused by earthquake? | Please refer to Section 3.2.4 for an analysis of potential impacts associated with earthquakes. |
| USCG-2021-0183-XXXX | gg | What would be the water quality and marine life impacts in a liquefaction event? | A natural liquefaction event would not be the result of the proposed action. Therefore potential impacts to water quality and marine life impacts from such a natural event are not analyzed. |

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| USCG-2021-0183-XXXX | hh | Will vessels docked at this facility be using power while docked (e.g., to run fridges or other appliances)? How much on average? What are the climate and health impacts of the power based on lifecycle emissions using best available science? | Current planning encourages the use of shoreside generators during periods when vessels are docked at Base Seattle. |
| USCG-2021-0183-XXXX | ii | How many additional personnel will the expanded facility support? What impacts will this have on local traffic times and air pollution? | The proposed growth in personnel is described in Section 1 and 2. The impacts on transportation and air quality are discussed in Sections 3.4 and 3.5, respectively. |
| USCG-2021-0183-XXXX | jj | What impacts will there be to salmon from the toxins in tires that reach waterways? | Please see Section 3.6 for a discussion on Biological Resources. |
| USCG-2021-0183-XXXX | kk | Will buildings be built using environmentally conscious designs? | Please refer to Sections 1 and 2 for information regarding environmentally conscious design considerations. |
| USCG-2021-0183-XXXX | ll | How could this Project's use of Terminal 46 impact longshore worker job security? | The potential impact to jobs and socieoeconomics is discussed in Section 3.7 of the PEIS. |
| USCG-2021-0183-XXXX | mm | How would committing to this Project impact the Port's ability to use Terminal 46 for green job opportunities or community spaces? | Job opportunities are discussed in Section 3.7, Socioeconomics, of the PEIS. |
| USCG-2021-0183-XXXX | nn | Will the Project be in alignment with city, county and state comprehensive plans, climate goals and equity goals? | Compatibility with current land use and plans is addressed in Section 3.1, Land Use. |
| USCG-2021-0183-XXXX | a | The population of the combined neighborhoods, according to the City of Seattle Department of Neighborhoods, is 5,289 of which 33.2% are White and 66.8% are non-White. Ninety-four percent of the residents are renters and the median household income is $26,559. In addition, a high proportion of these residents are elderly. All of these factors combine to depict a vulnerable community at risk of displacement and harm. | An analysis of socioeconomic and environmental justice impacts is provided in Section 3.7 of the PEIS. |

| Comment ID | Sub ID | Comment | Comment Response |
|---|---|---|---|
| USCG-2021-0183-XXXX | b | All of the proposals to expand and modernize the Coast Guard Base Seattle at Port of Seattle Terminals 46 and 30 will follow on the heels of multiple long-term public construction projects including: the removal of the Alaskan Way Viaduct (Highway 99), the reinforcement of the Elliott Bay seawall; the development of the Waterfront Project and Promenade; the expansion of the Washington State Ferry Terminal, and the on-and-off again City of Seattle Streetcar. The culmination of traffic in and through the adjacent streets, including the co-mingling of passenger and commuter vehicles with commercial trucks, has created hazardous vehicular and pedestrian conditions. The PEIS should specifically examine how construction will impact ongoing construction projects and existing access to the Seattle waterfront. | Transportation, including construction traffic, is addressed in Section 3.4. Cumulative impacts are addressed in Section 4 of the PEIS. |
| USCG-2021-0183-XXXX | c | The PEIS should also examine how construction staging will reduce the through-flow of traffic on the waterfront and through the residential neighborhoods. | Construction staging and the affects on traffic are addressed in Section 3.4.4 of the PEIS. |
| USCG-2021-0183-XXXX | d | …the PEIS should measure the cumulative impact of construction noise and activity on the nearby residents. | Noise impacts are addressed in Section 3.9.4 of the PEIS. |
| USCG-2021-0183-XXXX | e | One significant outcome of the removal of the Alaskan Way Viaduct (Highway 99) is the reduction in the vehicular capacity of the roadway, thereby re-routing traffic to surface streets and adding to traffic congestion. Alternative 1 identifies that 13 acres of new parking will be added to the expanded base. The PEIS should specifically examine how the addition of the maximum capacity of this parking lot will affect traffic, overall and at specific times of day. | Section 3.4.4 provides the impact analysis for parking and the associated parking. |
| USCG-2021-0183-XXXX | f | In addition, the PEIS should identify opportunities to mitigate U.S. Coast Guard personnel traffic with off-site parking options with employee shuttles, much as Microsoft and Amazon provide to their employees. | The Coast Guard has included an analysis of impacts for the proposed amount of parking on-site in Section 3.4.4. |
| USCG-2021-0183-XXXX | g | The addition of a new 5-story 75,000 s.f. Base Administration Building and a new 3-story 36,000 s.f. Mission Support Building will compound an existing problem experienced by the immediately adjacent neighborhoods with transient individuals that are not incentivized to economically support the local micro-economies. The PEIS should measure the economic contribution of the expanded facilities and the extent to which this economic activity benefits or depresses the adjacent neighborhoods. | Socioeconomic impacts are addressed in Section 3.7.4 of the PEIS. |

| Comment ID | Sub ID | Comment | Comment Response |
|---|---|---|---|
| USCG-2021-0183-XXXX | h | The expansion of the U.S. Coast (Guard) Base suggests a more robust level of operational activity. The PEIS should examine how expanded operations may exacerbate concerns about traffic as noted above as well as potential concerns about hours of operation, especially with respect to the timing of highly popular sporting activities. During some home games of the Seattle Seahawks, upwards of 60,000 fans will descend on the Stadium District with spillover traffic – vehicular and pedestrian – to the surrounding neighborhoods. | Please refer to Section 3.4.4 for an analysis of potential impacts to traffic and how T-Mobile Park and the Stadium District would be affected. |

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PUBLIC SUBMISSION

# Comment Submitted by Anonymous

Posted by the **Coast Guard** on May 12, 2021

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I absolutely support alternative one. The USCG needs to remain long term in Seattle and the base needs to be developed with a vision to the future.

**Comment ID**

USCG-2021-0183-0002

**Tracking Number**

kom-tmdd-hz19

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**Received Date**

May 12, 2021

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Fred Rivera
EVP & General Counsel
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May 27, 2021

Submitted via the Scoping Portal and U.S. Mail

U.S. Coast Guard
Shore Infrastructure Logistics Center
Environmental Management Division
Attn: Mr. Dean Amundson,
1301 Clay Street, Suite 700 N
Oakland, CA 94612-5203

Re: *NEPA Scoping Comments – Coast Guard Facility (Docket Number USCG-2021-0183).*

Dear Mr. Amundson and Interested Parties:

Thank you for the opportunity to provide scoping comments on the NEPA Programmatic Environmental Impact Statement ("PEIS") being prepared for the Modernization of Coast Guard Base Seattle proposal. (*See* Docket Number USCG-2021-0183). We submit this comment letter on behalf of The Baseball Club of Seattle, L.L.L.P., generally known as the Seattle Mariners ("Mariners"). We ask to be made parties of record and receive future notices pertaining to this proposal.

**Background**

The Mariners are the long-term lessee of the ballpark known as T-Mobile Park located at 1250 1st Avenue South, Seattle, Washington. We operate the ballpark pursuant to an agreement with the Washington State Major League Baseball Stadium Public Facilities District ("PFD").

T-Mobile Park is an important part of its surrounding SoDo neighborhood and is a year-round destination for residents and visitors alike, drawing nearly three million guests each year. The ballpark hosts tens of thousands of fans for each of the Mariners' 81 annual home games, including Little League and Youth Baseball Weekends – annual promotional events at Mariners games that routinely draw 25,000 or more participants. In a typical year, T-Mobile Park also hosts approximately 650 public tours, bringing people into the SoDo neighborhood even outside

of the typical baseball season. In addition, the T-Mobile Park is used for high school and charity sporting games, school graduations, weddings and b'nai mitzvah, children's activities, concerts and other public gatherings, including a beloved winter Christmas event, "Enchant," that enlivens the local neighborhood. The Mariners have thrived in this area since the franchise was established in 1977.

T-Mobile Park is located very near to Terminal 46 and Coast Guard Base Seattle, both of which are affected by the Modernization of Coast Guard Base Seattle proposal. The Mariners have thrived in this location since the franchise was established in 1977. As a major destination within the SoDo neighborhood of Seattle, the Ballpark is supported by city land use policies. For example, there are policies supporting the "pedestrian-oriented character of the area." *See* Seattle Municipal Code Chapter 23.70.002.A. Per the Seattle Comprehensive Plan, an important aspect of the area is "to promote an environment that is attractive and safe for the large volumes of pedestrians attending events in the area." The Stadium District remains an important economic engine for the City, providing a significant tax base, supporting thousands of jobs, and attracting a large volume of community members and visitors to the neighborhood.

As demonstrated above, the Mariners have an important interest in this integral area of our City, and therefore appreciates the opportunity to comment on such a major modernization undertaking. The Mariners welcome smart new development in the neighborhood that supports the ballpark and surrounding business. While we support the goals of the development and the modernization of Coast Guard Base Seattle, and more generally improvement in the northern portion of SoDo, the modernization effort will need to be carried out with great care to avoid significant adverse impacts.

**Scoping Comments**

We respectfully request that the PEIS scope cover the following topics.

1. **Traffic and Parking.** The PEIS should have a robust parking and traffic analysis under all Alternatives, including motorized and non-motorized forms of travel. The impact to T-Mobile Park and the Stadium District should be analyzed and mitigation measures should be specified.

2. **Land Use Impacts**. The land use impacts on the Stadium District and T-Mobile Park should also be included in the PEIS scope. Both direct and indirect impacts should be identified. If there are adverse impacts to the success of the ballpark or our organization, those impacts must be identified and mitigated.

3. **Construction Impacts**. The PEIS must carefully identify construction impacts of the proposed project and all Alternatives. Impacts to T-Mobile Park must be identified and mitigated. Visitors must be able to reach our site reliably. We would look forward to the opportunity to work together on construction mitigation plans.

4. **Project versus Programmatic EIS**. The scoping notice identifies the proposal as a programmatic EIS; however, there is a specific project under consideration on a specific site. This rises to the level of a project action, a "tier-2" project-specific EIS. The programmatic EIS should clearly identify what the future phases of NEPA

environmental review will be, as well as what the review will be under our State Environmental Policy Act.

Thank you for the opportunity to comment. Please do not hesitate to reach out if we can be of assistance.

Very truly yours,

Fred Rivera

Fred Rivera
Executive Vice-President & General Counsel

cc: T. Ryan Durkan, Hillis Clark Martin & Peterson

Glen Milner
3227 NE 198th Place
Lake Forest Park, WA 98155
gk_milner@comcast.net

May 31, 2021

VIA Regulations.gov website, https:// www.regulations.gov

RE: Coast Guard Docket Number USCG–2021–0183, Modernization of Coast Guard Base Seattle; Preparation of Programmatic Environmental Impact Statement

U.S. Coast Guard
Port of Seattle

Thank you for the opportunity to address proposed actions regarding the modernization of the Coast Guard base on the Seattle waterfront.

I understand that Coast Guard facilities need renovation and modernization.

I am opposed to the proposed actions for three primary reasons—all which need to be addressed in the NEPA PEIS being prepared by the Coast Guard.

1. The land and space on the waterfront is too valuable for Coast Guard facilities. Sale of Port of Seattle property to the Coast Guard would be a loss of Port of Seattle real estate that likely could never be recovered.

An alternative should be presented whether the Coast Guard could relocate some operations to an area less congested than in the downtown Seattle waterfront.

2. Coast Guard agency operations, as a Department of Homeland Security agency and as one of the country's six armed services, are largely incompatible with civilian activities.

The Coast Guard is unique as an agency that: 1. Establishes its own regulations and penalties, 2. Provides its own law enforcement personnel for compliance: and 3. Determines innocence or guilt for any alleged offenders in a Coast Guard Hearing by a Coast Guard Hearing Officer. The authority for one agency to create laws, enforce the laws, and try alleged offenders is counter to normal democratic principles.

One example of this type of authority is a regulation establishing a no-protest zone, used against nonviolent demonstrators in Elliott Bay for a two-hour period each year. See 33 CFR 165.1330. There is no regulation like this in the U.S. and yet Coast Guard District Thirteen claims it is necessary to establish a “safety zone” near Pier 66 when the U.S. Navy fleet passes the pier during the annual summer Seafair Fleet Week. Since its enactment in 2011, the rule has often been incorrectly administered by the Coast Guard or other law enforcement agencies such as the Port of Seattle and Seattle Police.

However, if anyone is unfortunate enough to be charged with this regulation, they would be cited by the Coast Guard for the violation of an unnecessary regulation, established by the Coast Guard—and then tried in a Coast Guard hearing by a Coast Guard officer. Regarding this type of issue—there are many examples of this abuse of authority in the Puget Sound region and in other areas.

See https://www.offshore-energy.biz/coast-guard-sets-in-motion-civil-penalties-against-four-activists; https://www.propublica.org/article/gulf-safety-zones-restrict-access-with-criminal-penalties-for-press-and-pub; https://media.defense.gov/2019/Oct/10/2002193274/-1/-1/0/CIM_5582_1B.PDF.

3. Coast Guard facilities require a level of security that is incompatible with civilian activities.

The Coast Guard will determine what levels of security are necessary for expanded facilities on Pier 46 without consent from citizens in Seattle. Coast Guard security extends onto the shore.

I am also concerned about possible damage to our environment in Elliott Bay during the construction of new Coast Guard facilities as well as from ongoing Coast Guard operations.

Please keep me informed of proposed Coast Guard expansion in Elliott Bay.

Sincerely,

Glen Milner

MITAGS
MARITIME INSTITUTE OF TECHNOLOGY AND GRADUATE STUDIES

June 10, 2021

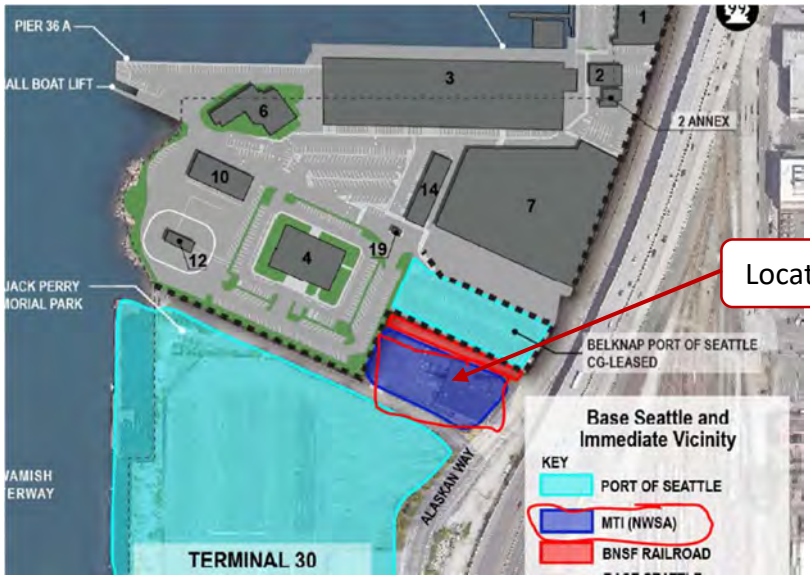
USCG -2021-0183
BaseSeattlePEIS@uscg.mil
U.S. Coast Guard
Shore Infrastructure Logistics Center, Environmental Management Division
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

RE: Public comments - Docket USCG - 2021-0183
MM&P MATES Program DBA Maritime Institute of Technology & Graduates Studies and Pacific Maritime Institute at 1729 Alaskan Way South, Seattle, WA.

**Purpose**

Docket USCG-0183: Proposes three alternatives for the modernization of Coast Guard Base Seattle. We are identified on the site map as MTI (NWSA), in purple. In the proposed Alternatives 2 & 3, 1729 Alaskan Way South, the building we rent from the Port of Seattle would be razed**, displacing** the Maritime Institute of Technology and Graduate Studies (MITAGS) West Coast Campus. We urge the Coast Guard to consider the following:

1. Select an alternative that does not require the school to be razed.
2. Provide financial assistance to offset the cost of moving the school to a new location in the Seattle area, and outfitting the new facilities.



MITAGS
MARITIME INSTITUTE OF TECHNOLOGY AND GRADUATE STUDIES

**Background on MITAGS**

In 1972, the Maritime Institute of Technology & Graduate Studies (MITAGS) opened its doors in Linthicum Heights, Maryland, with a new, sophisticated approach to maritime training. Its goal was to enhance the professional knowledge and skill of the International Organization of Masters, Mates, and Pilots (I.O.M.M.&P.) deck officers, by providing advanced training using simulation. Employers contributing to the joint labor-management trust (known as the Maritime Advancement, Training, Education, and Safety (M.A.T.E.S.) Program recognized the benefit of having well trained captains and deck officers serving on board their ships. The concept proved so successful that training was extended to pilots and non-members as well.

In the 1980's the program expanded with the acquisition of the U.S. Maritime Administration's Radar School in Seattle, Washington. The school has expanded to become the Pacific Maritime Institute (PMI). The most recent expansion included the purchase of Fremont Maritime, one the leading marine safety providers in the Pacific Northwest. Today, PMI and Fremont have been merged into **MITAGS WEST**. This provides students and companies with consistent high-quality mariner apprenticeships, simulation and training services at multiple locations.

The School has been a part of the Seattle Maritime Community since the 1980's and a tenant in good standing with the Port of Seattle since 2003. The school's willingness to enter into a 10-year lease of an abandoned building site allowed the Port to put 1729 Alaskan Way back into useful service, and gain a greatly improved real estate asset[1]. We have continued to make substantial investments in training and simulator structures that would be very costly to move.

As a private vocational non-profit, we operate on very thin margins. We do not have the financial resources to move the school and replace the existing training assets. We are in a lease with the Port of Seattle that will expire in 2024 with the option to extend for five years (March 2029). Evicting the school from this location, without some financial assistance, would likely be the **end** of our abilities to offer the sophisticated simulation training to the region.

Recently, MITAGS received the designation as a USDOT MARAD Center of Excellence for Domestic Maritime Workforce Training and Education (CoE). MITAGS is certified as a Maritime Training Provider by Det Norske Veritas (DNV-GL). MITAGS is also compliant with criteria set forth by the United States Coast Guard, the Military Sealift Command (MSC), the International Lighthouse Authority (IALA), the American Pilots' Association, the Maryland Higher Education Commission (MHEC), the Washington State Workforce Training, Education, and Coordinating Board, and the Veteran's Administration.

[1] MITAGS (formerly Pacific Maritime Institute) leased the site of the abandoned Flint Ink North American Corporation factory. The Port bought this property in February 2000 for $840,000 (King County Tax Parcel #766620-7795).

**Program Offerings**

The MMP MATES Program's (MITAGS) mission is to enhance the professionalism of mariners through the development of quality maritime leadership, training, education and safety programs. We offer over 150 courses and programs under one roof. There are no other schools in Washington State that offer this diverse mix of mariner training. Specific Programs include:

1. ***MILITARY Training and Simulation***: Since opening our doors, we have worked with the local USCG Base Seattle to provide maritime simulation for the crews and commanders of the USCG HEALY and POLAR STAR. We have provided simulation and training for the US Navy Region NW, Sea Cadets, Military Sealift Command (MSC), and Army Corp of Engineers (USACOE). In addition, we are designated by the Department of Defense as part of the *Defense Industrial Base Essential Critical Infrastructure Workforce "…because our efforts include support manning, training, equipping deploying or supporting military forces."* [2]
2. ***Incumbent Worker Training***: Mariners must complete specialized training required by national and international regulatory bodies. Critical skill sets include firefighting, personal survival, first aid, emergency response, and pollution prevention must be refreshed on a periodic basis. Without this recertification, the mariners cannot work.
3. ***Entry Level and Apprenticeships***: Getting into the maritime industry is challenging. It takes twenty-plus weeks of classroom and simulation-based training to achieve licensure for national and international requirements. The MITAGS multi-year apprenticeships are highly sought out by retired military veterans seeking new careers. The school is very active in the "military to mariner" initiatives. The Washington State Ferries (WSF) Apprenticeship Program is one of our newest that is developing the next generation of ferry mates and captains. MITAGS offers two Apprenticeship programs for Officer in Charge of a Navigational Watch and two additional engineering programs pending United States Coast Guard approval. These programs are approved through Department of Labor and were created based on industry needs for mariner education and training.
    - Maritime institute of Technology and Graduate Studies-Pacific Maritime Institute Standards of Apprenticeship (Officer in Charge of a Navigational Watch):
        - O*NET-SOC CODE: 53-5012.02
        - RAPIDS CODE: 1105
    - Pacific Maritime Institute and Western Towing Apprenticeship Program (Officer in Charge of a Navigational Watch):
        - O*NET-SOC CODE: 53-5012.02
        - RAPIDS CODE: 1104

[2] DOD, Department of the NAVY, Commander Military Sealift Command, Memorandum for Distribution, Defense Instruction Base Essential Critical Infrastructure Workforce, March 20, 2020.

- Officer in Charge of an Engineering Watch (OICEW):
  - O*NET-SOC Code: 53-5031.00
  - Type of Training: Hybrid

4. ***Deck Officer Skills Assessment***: The school is recognized world-wide for its unique Navigation Skills Assessment Program (NSAP)®. This simulation-based assessment program assists companies in ensuring that deck officers maintain their navigation competencies throughout their careers.
5. ***Pilot Skills Assessment***: Similar to the NSAP®, the school has developed simulation based assessment systems and procedures for the pilot applicant selection process. Our examination processes ensure the selection of highly qualified individuals for the next generation of State pilots. We have developed and conducted pilot examinations for:
   - Washington State Board of Pilot Commissioners (Puget Sound Pilots)
   - South East Alaska Pilots Association
   - Columbia River Bar Pilots Association
   - Los Angeles Pilots
6. ***Industry Training and Simulation***: in addition to training individual mariners, we also work with a variety of maritime companies, including tug, cruise lines, oil majors, workboat companies, fishing fleet and non-profit vessels (Mercy Ships) to provide custom state of the art simulation training.
7. ***Operational Research***: The school has an advanced ship simulation infrastructure supported by an outstanding simulation engineering team. The school has conducted numerous feasibility studies for ports and ship operators from around the globe. (The Port of Seattle, the local pilots and tug operators use our simulation facilities.) Through simulation, the maritime stakeholders work together in a "virtual world" evaluating designs, developing best practices for vessel transits and mitigation strategies for emergencies.

**Awards and Recognition**

Throughout the years, MITAGS has received multiple awards as a testament to the training provided. These include:

- 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE)
- Plimsoll Award for Outstanding Service for MITAGS' Navigational Skills Assessment Program® (2017)
- Lloyd's List – North America – Training Program, Workboat Academy (2015)
- US Dept. of Labor Innovator and Trailblazer Award – Registered Apprenticeship (2012)

MITAGS
MARITIME INSTITUTE OF TECHNOLOGY AND GRADUATE STUDIES

**Summary**

MITAGS is a significant asset to Pacific Northwest Maritime Community and beyond. We have been training mariners in the community for over 23 years. In addition to training local mariners, it serves as an economic engine which draws professional mariners from all over the world. It offers services which cannot be obtained anywhere else in the region.

MITAGS provides Coast-Guard-required safety and survival training to mariners, who most often must serve as the first responders to emergencies aboard their vessels whether at sea or in port. MITAGS also provides essential training in hazardous materials safety and spill response, which helps prevent the large-scale dangers of toxic oil and chemical spills.

If MITAGS was to shut its doors, it would not just impact the local maritime community, but the health and safety of our local and regional waterways and the people who live, work and play in the areas around Puget Sound.

Finally, we would no longer be able to assist the USCG, US NAVY, MSC, Army Corps of Engineers and other government and military entities in critical simulation training of their crews and commanders.

Please consider selecting the alternative that does not require the removal of the school from its current location. If that is not feasible, provide financial assistance to move the school and outfit a new facilities.

Respectfully,

Mr. Glen M. Paine
Executive Director
MMP MATES Program (MITAGS)
www.mitags.org
gpaine@mitags.org
443-989-3233

cc: Capt. Donald Marcus, International President, International Organization of Masters, Mates & Pilots
Capt. Donald Josberger, International Secretary Treasurer, International Organization of Masters, Mates & Pilots
Captain Timothy Saffle, Vice President, MMP United Inland Membership – Pacific Maritime Region.
Mr. James Truhan, Port of Seattle

Centric
Business Systems

Department of Homeland Security
Coast Guard
Docket Number USCG-2021-0183

RE: Base Seattle PEIS Public Comment

To whom it may concern:

We the undersigned Centric Business Systems, are writing in support of the Maritime Institute of Technology and Graduate Studies "MITAGS" (formerly known as Pacific Maritime Institute), located at 1729 Alaskan Way South in Seattle.

We understand that the Department of Homeland Security has proposed a modernization of Coast Guard Base Seattle, in which two of the three options require the school to be removed. Although we fully support the Coast Guard's need to modernize, there needs to be some accommodation in order not to lose the school. This could be to select an option that allows the school to remain or provide financial assistance for moving the school to a nearby location and properly outfitting the facilities.

MITAGS provides US Coast-Guard-required safety and survival training to mariners, who often serve as emergency first responders aboard their vessels. We depend on MITAGS' first aid, survival, firefighting, hazardous materials, and other emergency response courses to help our employees react appropriately and minimize the risk to life and property.

The School is equipped with three advanced ship and tug simulators. Mariners use the simulators to enhance their skill sets for safe navigation. The training greatly mitigates the risks of groundings, collisions, and allisions. MITAGS also offers an award-winning navigational assessment program called NSAP®. This program helps maritime companies pre-qualify deck officers prior to employment and evaluate the skills of officers already in service.

Pilot organizations, including the Puget Sound Pilots, use MITAGS to help select and train their personnel. They also regularly use the simulators for navigation studies to evaluate whether it is safe and under what conditions for new vessel classes to transit.

MITAGS is a significant asset to Pacific Northwest. In addition to training local mariners, it serves as an economic engine that draws professional mariners from all over the world. Its services cannot be obtained anywhere else in the region. If MITAGS was to shut its doors, it would negatively impact the local and regional maritime community.

In summation, MITAGS provides essential maritime services. We respectfully request that the DOHS consider options that would ensure this important maritime asset remains part of the Seattle Maritime Community.

Mike Coppa, Strategic Account Manager

Michael Coppa

centricbiz.com
10702 Red Run Boulevard | Owings Mills, MD 21117
410-902-3300 | 410-902-3307 (fax)

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PUBLIC SUBMISSION

# Comment Submitted by Captain Jill Russell

Posted by the **Coast Guard** on Jun 15, 2021

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Good day. I am a Pilot with the SE Alaska Pilots' Association, but I make my home in Washington. I am in opposition to two of the three choices, as the two that would displace the maritime training school MITAGS would have a direct affect on my ability to conduct Pilot Training, Pilot Examinations, and ongoing training. There are no other world class simulators or institutions with the knowledge, skills and abilities that MITAGS has on the entire west coast, let alone the PNW. The school's current location is perfect for their mission, convenient for those of us traveling from out of state, and has already invested heavily in their infrastructure, which I can imagine would be very difficult to replicate in another location. Should MITAGS shut its doors, we would have to travel to the east coast, spending our dollars outside of the region, and honestly, getting a subpar product. Therefore, I request that the DOHS consider options that would NOT displace MITAGS.

**Comment ID**

USCG-2021-0183-0007

**Tracking Number**

kpz-qakp-z16e

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Jun 15, 2021

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www.wsdot.wa.gov

June 18, 2021

Submitted via the Scoping Portal

U.S. Coast Guard
Shore Infrastructure Logistics Center
Environmental Management Division
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700 N
Oakland, CA 94612-5203

RE: Coast Guard Base Seattle – NEPA Scoping Comments
(Docket Number USCG-2021-0183)

Dear Mr. Amundson:

Thank you for the opportunity to provide scoping comments on the NEPA Programmatic Environmental Impact Statement (PEIS) being prepared for the proposal to expand and modernize the Coast Guard Base in Seattle. The Washington State Department of Transportation (WSDOT) and Washington State Ferries (WSF) appreciates the positive and collaborative relationship that our agencies have shared for a considerable amount of time. We look forward to continuing our work together by requesting to participate as a Cooperating Agency with the Coast Guard in preparation of the PEIS and to continue to receive information about the proposal.

WSDOT has a long record of partnership with the City of Seattle and the Port of Seattle. The Alaskan Way Viaduct (AWV) Replacement Program, which is delivering 30 projects and over $3 billion of infrastructure improvements to downtown Seattle's transportation system, was developed in coordination with the Port of Seattle. While WSDOT prepares to deliver the 30th and final project in the AWV Program, the agency continues to support and recognize the importance of successful Port operations and maintains an interest in how the Coast Guard proposal would affect traffic operations around WSDOT and Port of Seattle facilities.

WSDOT is submitting the following scoping comments:

Traffic –

- The traffic analysis should include trip generation, trip distribution, and traffic analysis, including AM and PM peak periods for the year of opening as well as design year, for the proposed alternatives.
- The trip generation/distribution and traffic analysis should include, but not be limited to, the following WSDOT facilities:

- SR 99 – Northbound and southbound ramp terminal intersections at Royal Brougham Way and Dearborn St/Alaskan Way.
- I-90 – Eastbound & westbound ramps terminal intersections at SR 519/Atlantic and 4th Ave S.
- SR 519/1st Ave – Intersections at Royal Brougham Way and Dearborn St.
- Washington State Ferries (WSF) Colman Dock Ferry Terminal – Ferry holding and ferry loading/unloading operations at SR 519/Alaskan Way.

Multimodal –

- A modal analysis should evaluate effects to facilities such as the Elliott Bay Trail as well as future routes or transit stops.
- The modal analysis should consider how potential vehicle trip generation be mitigated through transportation demand management programming.
- The modal analysis should identify the different types of trips (commute, emergency response, training attendance, etc.) and evaluate the types of vehicle trips that are more conducive to substitution by other modes, such via as the Elliott Bay Trail.

Ferries –

- WSDOT is concerned about the cumulative effect of the development of this portion of Seattle waterfront, specifically related to the Coast Guard facility, cruise ship terminal, and other uses at Terminal 46, as well as the availability of dry dock capacity in the Puget Sound region.
    - The analysis should identify assumptions about cruise ships at Terminal 46 as proposed by Port of Seattle.
    - The analysis should evaluate how increased Coast Guard vessels and/or cruise ships at Terminal 46 affect Washington State Ferry (WSF) ferry routes and operations at Colman Dock.
    - The analysis should evaluate how increased Coast Guard vessels and/or cruise ships and operations of the facility account for dry dock capacity.
    - The analysis should evaluate how Terminal 46 uses impact use of Pier 48. WSF has a continued long-term interest in the use of Pier 48 for its electrification program and operations.
    - The analysis should also consider how the operations of the facility will support efforts to prioritize electrification of the waterfront.

Tribal –

- The project location is within the treaty adjudicated waters of federally recognized tribes, and the analysis should evaluate effects to treaty rights of

those tribes. The Coast Guard's process should include government-to-government consultation with tribes, and WSDOT encourages the Coast Guard to engage in early and on-going consultation to address tribal concerns.

Construction –

- The analysis should include evaluation of construction impacts to transportation systems, including locations listed above in Traffic, as well as other multimodal transportation elements in the vicinity.

WSDOT looks forward to future coordination with USCG on this project. Please feel free to contact Kevin Bartoy (Environmental Stewardship & Sustainability Program Manager, Washington State Ferries) at kevin.bartoy@wsdot.wa.gov, or 206.251.4427, with any questions or future correspondence.

Sincerely,

Patty K Rubstello

Patty K. Rubstello, P.E.
Assistant Secretary, Washington State Ferries

Mike Cotten

Mike Cotten, PE, DBIA
Regional Administrator, NW Region
Washington State Department of Transportation

cc: Kevin Bartoy, WSDOT
Ron Judd, WSDOT
Margaret Kucharski, WSDOT

# USCG Letter_Formatted_For Signature (002)

Final Audit Report 2021-06-16

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STATE OF WASHINGTON

**BOARD OF PILOTAGE COMMISSIONERS**

2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

June 17, 2021

Department of Homeland Security
Coast Guard
Docket Number USCG-2021-0183

RE: Base Seattle PEIS Public Comment

Good morning:

As chair of the Washington State Board of Pilotage Commissioners (BPC), I am writing in support of the Maritime Institute of Technology and Graduate Studies "MITAGS" (formerly known as Pacific Maritime Institute), located at 1729 Alaskan Way South in Seattle.

I understand that the Department of Homeland Security is seeking comment regarding modernization of Coast Guard Base Seattle, in which two of the three options require the MITAGS building to be relocated. Although the BPC supports the Coast Guard's need to modernize, it is important that MITAGS continue to provide essential services. This could be to select an option that allows the school to remain or provide financial assistance for moving the school to a nearby location and properly outfitting the facilities.

MITAGS held the most recent contract for administering the BPC marine pilot exam and just completed exam the process onsite. The BPC and Puget Sound Pilots rely on the services of MITAGS for the one of the three onsite simulators as part of the marine pilot exam as well as for pilot training. Use of the simulators allows the BPC to examine candidates to demonstrate their skillsets for safe navigation. The training greatly mitigates the risks of groundings, collisions, and allisions. There is no suitable alternative in the Puget Sound region, which would add significant cost to the marine pilot exam, likely limit the number of pilot candidates, and limit access to important training opportunities. The simulator has been used for azipod training, and for simulated maneuvering of the very large container ships now coming to Puget Sound. The loss of MITAGS would be a significant detriment to safe pilotage in Puget Sound and Grays Harbor.

MITAGS is a significant asset to the Pacific Northwest. In addition to training local mariners, it serves as an economic engine that draws professional mariners from all over the world. Its services cannot be obtained anywhere else in the region. If MITAGS was to shut its doors, it would negatively impact the local and regional maritime community.

In summary, MITAGS provides essential maritime services for the BPC and for pilotage. We respectfully request that the DOHS consider options that would ensure this important maritime asset remains part of the Seattle Maritime Community.

Sheri Jeanne Tonn, PhD
Chair, Board of Pilotage Commissioners

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 10**
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

REGIONAL
ADMINISTRATOR'S
DIVISION

June 17, 2021

Dean Amundson, Coast Guard
U.S. Coast Guard
Shore Infrastructure Logistics Center
Environmental Management Division
1301 Clay Street, Suite 700N
Oakland, California 94621

Dear Mr. Amundson:

The U.S. Environmental Protection Agency has reviewed the U.S. Coast Guard's Notice of Intent to prepare a Programmatic Environmental Impact Statement (PEIS) for the Modernization of Coast Guard Base Seattle located on Puget Sound in Seattle, Washington (EPA R10 Project Number 21-0023-USCG). EPA provides these comments pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act.

According to the Notice, over the next 10 years the Coast Guard would have acquired land and made improvements to: resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities. This proposed action is therefore needed to address substantial existing deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard missions, as well as provide facility enhancements necessary to support current and future major cutters homeported at Base Seattle.

EPA supports the purpose of the proposed project to modernize and renovate operational and mission support facilities and infrastructure. EPA also appreciates the Coast Guard's plan to analyze the project's potential impacts on environmental resources using the NEPA process. In addition to issues and resources that would be analyzed in the anticipated PEIS for the project, EPA offers the enclosed scoping comments the Agency believes are important to consider in the NEPA analysis for the project.

Thank you for the opportunity to provide scoping comments for this project proposal. EPA looks forward to participating in the proposed project's NEPA process. If you have questions about our comments, please contact David Magdangal of my staff at (206) 553-4044 or at magdangal.david@epa.gov, or me at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

REBECCA CHU

Digitally signed by REBECCA CHU
Date: 2021.06.17 13:14:57 -07'00'

Rebecca Chu, Chief
Policy and Environmental Review Branch

# U.S. Environmental Protection Agency Scoping Comments on Modernization of Coast Guard Base Seattle Seattle, Washington

**Environmental effects**

Because the project could impact natural resources in the analysis area, EPA recommends that any associated NEPA document include information on the potential impacts and any necessary mitigation measures to reduce or cancel those effects. This would involve the delineation and description of the affected environment or analysis area, indication of the impacted resources, the nature, extent, and variables of the impacts, and proposed mitigation measures to reduce those impacts. EPA recommends providing adequate information in the document on the following topics as it would be especially helpful for decision makers and the public.

***a) Water quality***

Section 303(d) of the Clean Water Act requires the States and Tribes with EPA-approved water quality standards (WQS) identify water bodies that do not meet WQS. Where WQS are not met, States and Tribes are required to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. EPA recommends that the PEIS for the project include the following information:

- Impacted waters of the U.S., the nature of the impacts, and specific pollutants likely to affect those waters;
- Water bodies potentially affected by the project that are listed on the State and most current EPA-approved 303(d) list;
- Existing restoration and enhancement efforts for those waters; how the proposed project would coordinate with those on-going efforts; and any mitigation measures implemented to avoid further degradation of impaired waters; and
- How the project would meet the antidegradation provisions of the CWA found in 40 CFR §§ 131.12(a)(1)-(3). The State of Washington's antidegradation policy can be found at https://apps.leg.wa.gov/WAC/default.aspx?cite=173-201A under Part III-Antidegradation.

Because the CWA also requires any construction project resulting in the disturbance of one or more acres to have authorization under the construction storm water discharge permit for industrial activities, EPA recommends the following information for the PEIS:

- Direct, indirect, and cumulative impacts from storm water discharges;
- How the project would meet the requirements of the National Pollutant Discharge Elimination System permit program under the CWA, including development of Storm Water Pollution Prevention Plans, reporting, and monitoring;
- If Coast Guard determines that the project will disturb areas with contaminated sediments/soils, additional requirements are necessary from the Washington State Department of Ecology. For more information, please contact David Adler, Industrial Stormwater Inspector at (206) 949-1615 or dadl461@ecy.wa.gov and Noel Tamboer, Permit Administrator at (360) 407-6467 ntam461@ecy.wa.gov;
- Best management practices, erosion and sediment control, and other mitigation measures to minimize impacts;

- Considerations for zero or low impact development techniques in project design due to their potential to reduce storm water volumes, and mimic natural conditions. For example, consider avoiding and minimizing creation of new impervious surface and excavation; and
- Application of green construction and management practices, consistent with the federal "green" requirements and opportunities that may apply to design, operation, and maintenance of project-related facilities and equipment.

***b) Aquatic resources and impacts***

Because there may be aquatic resources in the planning area, EPA recommends including the following information in the PEIS for the project:

- Description of all waters of the U.S., including project alternatives that could affect wetlands. EPA recommends also identifying any navigable waters in the analysis area;
- Acreages and channel lengths, habitat types, values, and functions of these waters;
- Whether the project would result in discharge of dredged or fill materials into surface waters of the United States. If so, CWA §404 authorization from the U.S. Army Corps of Engineers would be required for the project, and EPA recommends that the PEIS describe this permit application process and recommended measures to protect aquatic resources from impacts resulting from the proposed project;
- Mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to surface waters of the U.S.; and
- Floodplain impacts and actions to minimize the impacts. The CWA §404 regulates activities affecting waters of the U.S. within floodplains and Executive Order 11988, *Floodplain Management* addresses floodplains.[1]

***c) Solid waste, hazardous materials, and wastewater management***

The proposed action may result in direct, indirect, and cumulative impacts due to use of hazardous and non-hazardous materials, EPA recommends that the PEIS address these impacts. Therefore, we recommend that the PEIS:

- Describe measures to minimize the chances of accidental spills or release of pollutants into the environment, and emergency response measures should an accidental release occur;
- Address the applicability of state and federal hazardous materials, pollution prevention, and solid waste requirements, and appropriate mitigation measures to prevent and minimize the generation of solid and hazardous materials; and
- Assess the need to prepare and implement a Spill Prevention, Control, and Countermeasure and provide information addressing this SPCC.[2]

Because of past and ongoing industrial uses of the project area, there is need for careful attention to potentially contaminated sites in the area and sites that are being or have been under environmental cleanup through the federal Superfund Program and/or Washington State's Model Toxics Control Act, which includes managing sources of on-going contamination.

To the extent that the project may affect other cleanup programs at the State and Federal Level, coordination with the US EPA R10 Superfund and Environmental Management Division, the Washington State Department of Ecology, affected Federally Recognized Tribes, and other relevant

[1] https://www.epa.gov/cwa-404/floodplain-management-executive-order-11988
[2] https://www.epa.gov/sites/production/files/2014-04/documents/b_40cfr112.pdf

natural resource agencies will be essential. The EPA Region 10 Remedial Project Manager for the Harbor Island Superfund Site in the project area is Ravi Sanga who may be reached at (206) 553-4092 or Sanga.Ravi@epa.gov. EPA recommends that the PEIS discuss such coordination and recommended measures to protect human health and the environment.

***d) Air quality impacts***

Because the proposed action may result in impacts on air quality, EPA recommends that the PEIS for the project include:

- A detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and criteria pollutant non-attainment areas in the analysis area and vicinity, if applicable;
- Estimated emissions of criteria pollutants for the analysis area and discussion of the timeframe for release of these emissions from construction through the lifespan of the proposed project. For estimation of emissions, it would be helpful to specify all emission sources and quantify related emissions;
- Specific information about pollutants from mobile sources, stationary sources, and ground disturbance;
- A Construction Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen or NOx;
- Potential effects from air pollutants, including air toxics, to:
    - workers, ground crews, nearby residents, businesses; workers, ground crews, nearby residents, businesses;
    - sensitive receptor locations, such as, schools, medical facilities, senior centers and residences, daycare centers, outdoor recreation areas (e.g., parks); and
- Mitigation measures to minimize the proposed project impacts to air quality.

***e) Threatened and endangered species***

The proposed project may impact endangered, threatened or candidate species listed under the Endangered Species Act, their habitats, as well as state sensitive species. EPA recommends that the PEIS for the project identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project corridor and surrounding areas. In addition, provide information in the PEIS on the critical habitat for the species; impacts the project could have on the species and their critical habitats; and how the proposed project will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service and National Oceanographic Atmospheric Administration - Fisheries. The document may need to include a biological assessment and a description of the outcome of consultation with the USFWS and/or NOAA Fisheries under Section 7 of the ESA.

***f) Seismic and other risks***

As one of the goals of the proposed project is to minimize the potential seismic risks to buildings, we recommend that the PEIS for the project:

- Discuss the potential for and approaches to evaluate, monitor and manage seismic risk in the area;
- Include an updated seismic map or a reference to one;
- Include information on seismic design and construction standards and practices to minimize seismic (e.g. liquefaction), landslide, and other risks; and
- Identify measures to avoid and mitigate the risks.

### *g) Indirect and cumulative effects*

Please note that according to the Federal NEPA Contacts Meeting held on March 25, 2021, the 2020 CEQ regulations do not prevent or prohibit the analysis of indirect and/or cumulative effects. As such, EPA encourages analyzing the project's indirect and cumulative effects to best capture impacts to human health and the environment.

Cumulative impact analyses describe the threat to resources as a whole, presented from the perspective of the resource instead of from the individual project. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time. Discussions of cumulative impacts are usually more effective when included in the larger discussions of environmental impacts from the action (the environmental consequences chapter), as opposed to discussing cumulative impact analyses in a separate chapter.

In the cumulative impacts' analysis, EPA provides the following recommendations:

- Identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the project area;
- Characterize these resources in terms of their response to change and capacity to withstand stresses;
- Use trends data to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components; and
- Focus on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed project before mitigation.

**Climate Resilience and Greenhouse Gas Emissions Resilience**

Considering potential climate change impacts helps ensure that investments made today continue to provide benefits, even as the climate changes. Specifically, EPA recommends that the Coast Guard consider in its decision-making: (1) the ongoing and long-term risks posed by climate change regarding where associated structures should be placed, and (2) if such infrastructure is placed in locations of elevated risk of damages due to climate change, investments should be made to increase the resilience of infrastructure to potential impacts now and in the future.

For example, we recommend that the Coast Guard incorporate climate resilient design considerations and develop climate adaptation plans informed by the U.S. Fourth National Climate Assessment. EPA recommends that the Coast Guard consider potential climate impacts to the proposed project including, but not limited to, rising sea levels, drought, high intensity precipitation events, and increased fire risk. Consideration of these issues could help avoid infrastructure investments in vulnerable locations, e.g., areas in flood zones likely to be in submerged in the future.

EPA recommends that the PEIS incorporate measures that ensure the resiliency of proposed project activities to existing and foreseeable climate change trends. EPA believes the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and recommends agencies use the guidance when analyzing these issues. EPA also recommends the PEIS include an estimate of the GHG emissions associated with the project (i.e. mobilization, construction, operations, maintenance and decommissioning), qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project related GHG emissions. There are more specifics on those elements below.

"Affected Environment" Section

Include in the "Affected Environment" section of the PEIS a summary discussion of existing and reasonably foreseeable environmental trends related to the changing climate relevant to the project. This information will assist with identification of potential project impacts that may be exacerbated by climate change and to inform consideration of measures to adapt to climate change impacts. (Among other things, this will assist in identifying resilience-related changes to the proposal.)

"Environmental Consequences" Section

- Estimate GHG emissions associated with the proposal and its alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ's NEPA.gov website.[3] For actions which are likely to have less than 25,000 metric tons of CO2-e emissions/year, provide a qualitative estimate unless quantification is easily accomplished;
- Estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the action area, as discussed in the "affected environment" section;
- Recognizing that climate impacts are not attributable to any single action, but by a series of smaller decisions, EPA does not recommend comparing GHG emissions from a proposed action to global emissions. As noted by the CEQ revised draft guidance, "[t]his approach does not reveal anything beyond the nature of the climate change challenge itself: [t]he fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." EPA also recommends that the Coast Guard does not compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a project level analysis. Consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals; and
- Describe measures to reduce GHG emissions associated with the project, including reasonable alternatives or other practicable mitigation opportunities and disclose estimated GHG reductions associated with such measures. The PEIS' alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. EPA further recommends that the Record of Decision commits to implementation of reasonable mitigation measures using adaptive management practices that would reduce or eliminate project related GHG emissions.

**Social cost of carbon**

E.O. 14008 recognizes the climate crisis is profound, and directs the federal government to drive assessment, disclosure, and mitigation of climate pollution and climate-related risks. Social Cost of Greenhouse Gases (SC-GHG) estimates provide potentially useful information relevant to analyzing the impact of a project's GHG emissions.

Agencies are required to evaluate the full cost of GHG emissions by accounting for global damages to facilitate sound decision-making, which is the foundation of NEPA. These interim values are to be used by agencies when monetizing the value of changes in GHG resulting from federal actions.

[3] https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg.html

EPA recommends that the PEIS consider if the project necessitates providing estimates of the monetized damages associated with incremental increases of GHG emissions. As applicable, EPA recommends including the SC-GHG consistent with the technical support document found in E.O. 13990.[4] Some things to consider are:

- Estimate the Social Cost of Greenhouse Gases (SC-GHG) to conduct an analysis that incorporates the societal value of changes in carbon dioxide and other GHG emissions into benefit-cost analyses (BCA) of actions that have small, or marginal, impacts on cumulative global emissions;
- Discussion of a monetary comparison of the benefits received by society to the costs imposed on society is appropriate in evaluating a proposed project and potential alternatives. EPA recommends taking into account established practices for BCA (e.g., *See* Office of Management and Budget's (OMB) *Circular A-4* and references therein);[5]
- When a BCA is conducted, it is appropriate to use estimates of the SC-GHG that reflect the best available science and methodologies to incorporate the value to society of net changes in direct and indirect GHG emissions resulting from a proposed project (i.e., relative to a no action alternative);
- Discussion of, where it is possible, the development of a reasonable estimate of the net change in emissions due to the proposed project (e.g., that reflects how carbon-based energy production and demand from competing markets might change), then SC-GHG estimates will be useful for assessing the value to society of GHG changes in the BCA[6]; and
- When a full BCA is not complete, SC-GHG estimates may be used for project analysis when the lead agency determines that a monetary assessment of the impacts associated with the estimated net change in GHG emissions provides useful information in its environmental review or public interest determination. Specific recommendations regarding areas of federal decision-making where SC-GHG estimates should be applied are expected from the Interagency Working Group by September 2021, as specified in E.O. 13990.

**Coordination with land use planning activities**

EPA recommends that the PEIS discuss how the proposed project would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity. Additionally, EPA recommends that the document address existing constraints in the analysis area, e.g., utility rights-of-way, floodplains, and how proposed land uses are consistent and compatible with other land uses and identify any needed construction and operating permits and licenses.

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[4] Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990; https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

[5] https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A4/a-4.pdf

[6] A discussion of the SC-GHG estimates used in recent federal BCA can be found in EPA's supporting documents for the Revised Cross-State Air Pollution Rule (CSAPR) Update Rule. Specifically, the estimates used in the BCA of the Revised CSAPR rule are the interim SC-GHG estimates that EPA and other members of the IWG developed under E.O. 13990 for use in BCA until an improved estimate of the impacts of climate change can be developed based on the best available science and economics taking into consideration recommendations from the National Academies of Sciences, Engineering, and Medicine (National Academies, 2017).

**Public involvement in project planning and implementation**
Because EPA anticipates that the proposed project would be of interest to a variety of stakeholders in the area, EPA strongly recommends that the Coast Guard disclose in the PEIS the efforts undertaken to ensure effective public participation in the scoping process and throughout the NEPA analysis process. For more information on effective public participation in the NEPA process, please consult the following resources:

- *The Citizen's Guide to the National Environmental Policy Act*[7];
- *Community Guide to Environmental Justice and NEPA Methods*;[8]
- *Community Impact Assessment*[9]*;* and
- *Model Guidelines for Public Participation*[10].

**Environmental Justice**
If the analysis area includes low income or minority populations, the PEIS would need to address the potential for disproportionate adverse impacts to the populations. See Executive Orders 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*; 14008, *Tackling the Climate Crisis at Home and Abroad*; and 13985, *On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*. [11] One tool available to locate minority and low income populations is the Environmental Justice Screening and Mapping Tool or EJSCREEN.[12] You may also consult the Federal Interagency Working Group on Environmental Justice and NEPA Committee report, *Promising Practices for EJ Methodologies in NEPA Reviews* for additional information, particularly on determining whether the proposed project may result in disproportionately high and adverse impacts.[13] EPA recommends that other vulnerable and disadvantaged populations, such as, the elderly, the disabled, and children, be included in the analysis. [14]

Other GIS tools and resources could complement the analysis to identify potentially affected communities with environmental justice concerns. The Coast Guard could request specific assistance from other federal and state agencies that might have information collected via ground truthing. An example of an emerging tool at the national and state level include:

- Limited English Proficiency Data and Language Map;[15] and
- Washington State's Environmental Health Disparities Map.[16]

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[7] https://ceq.doe.gov/get-involved/citizens_guide_to_nepa.html
[8] https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf
[9] https://www.fhwa.dot.gov/livability/cia/index.cfm
[10] https://www.epa.gov/sites/production/files/2015-02/documents/recommendations-model-guide-pp-2013.pdf
[11] https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf; https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02177.pdf; https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government
[12] https://www.epa.gov/ejscreen
[13] https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf
[14] See Executive Order 13045, Protection of Children from Health Risks and Safety Risks, at https://www.epa.gov/laws-regulations/summary-executive-order-13045-protection-children-environmental-health-risks-and
[15] https://www.lep.gov/maps
[16] https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN/InformationbyLocation/WashingtonEnvironmentalHealthDisparitiesMap

EPA recommends that the Coast Guard ensure that alternatives in the environmental analyses consider environmental justice concerns and allow communities with environmental justice concerns the opportunity to participate in the decision-making process.

EPA recommends the "Environmental Justice (EJ) Interagency Working Group (IWG) Promising Practices for EJ Methodologies in NEPA Reviews" report, or the Promising Practices Report, as a tool that can provide ways to both consider environmental justice concerns during environmental analyses and ensure effective participation by communities with environmental justice concerns.[17] The Promising Practices Report is a compilation of methodologies gleaned from current agency practices concerning the interface of environmental justice considerations through NEPA processes. For example, the Promising Practices Report suggests initiating meaningful engagement with communities early and often; providing potentially affected communities with an agency-designated point of contact; and convening project-specific community advisory committees, as appropriate.

When designing community engagement opportunities, the Promising Practices Report suggests selecting meeting locations, times and facilities that are local and convenient for potentially affected communities with environmental justice concerns and considering any potential cultural, institutional, geographic, economic, historical, linguistic, or other barriers to achieving meaningful engagement with the community.

Similar requirements for project proponents would ensure broad conformity to high standards of meaningful public and tribal involvement. The information acquired from meaningful involvement can help augment information not readily available through environmental justice screening tools (e.g., information about subsistence use integral to indigenous communities for ensuring food access/security).

Thoughtful consultation will readily inform the Coast Guard of the importance of certain areas and impacts to consider in a project proponent's NEPA analyses. For example, EPA encourages the Coast Guard to be aware of potential exposure pathways through surface water contact during fishing and consumption of fish.

Furthermore, EPA recognizes that every community is different, and every project is unique. For these reasons, the Coast Guard could benefit from hiring personnel with expertise in public outreach and engagement that could develop a plan or checklist that the Coast Guard could use to screen projects at the earlier stages of the process and evaluate the level of engagement needed to meaningfully inform the decision-making process.

**Coordination with tribal governments**

EPA recommends the PEIS describe the process and outcome of government-to-government consultation between the Coast Guard and each of the tribal governments affected by the project, issues that were raised, if any, and how those issues were addressed. See Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments.*[18]

The project area is a usual and accustomed fishing area for the Duwamish Tribe of Indians, the Suquamish Indian Tribe of the Port Madison Reservation, Washington, the Muckleshoot Indian Tribe,

[17] https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews
[18] https://www.energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/Req-EO13175tribgovt.pdf

and the Confederated Tribes and Bands of the Yakima Nation.[19] The federal government recognizes tribes as sovereign nations with fishing rights at all "usual and accustomed [fishing] grounds and stations." The term "usual and accustomed" used in treaty language refers to those areas where tribes traditionally fished at before the federal government made treaties. These tribes have commercial fishing rights for salmon, shellfish, and non-salmon fish resources, as well as rights to harvest fish and shellfish for ceremonial and subsistence purposes. EPA therefore recommends evaluating impacts to Tribal Treaty resources by describing in the PEIS all tribe's current ability, and likely ability under the action alternatives, to exercise their treaty-reserved fishing rights in their usual and accustomed grounds and stations.

**National Historic Preservation Act**

Section 106 of the National Historic Preservation Act requires consultation for tribal cultural resources. The NHPA includes historic properties that are in or meet the criteria for the National Register of Historic Places. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Office/Tribal Historic Preservation Office. Under NEPA, the PEIS must disclose any impacts to tribal, cultural, or other treaty resources. Section 106 of the NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR 800.

In the PEIS, discuss how the Coast Guard would avoid or minimize adverse effects on the physical integrity, accessibility, or use of cultural resources or archaeological sites, including traditional cultural properties (TCPs), throughout the project area. Discuss mitigation measures for archaeological sites and TCPs. EPA encourages the Coast Guard to append any Memoranda of Agreements to the PEIS, after redacting specific information about these sites that is sensitive and protected under Section 304 of the NHPA. EPA also recommends providing a summary of all coordination with Tribes and with the State and Tribal Historic Preservation Offices, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan.

**Permits and authorizations**

As construction of the project would likely require a variety of authorizations, EPA recommends that the PEIS include a list of all permits/authorizations that the proposed project already has and will need including modification(s) to any existing permit or authorization, what activity and/or facility is regulated by the permit or authorization, entities that will issue each permit and authorization, when each will expire, and conditions to assure protection of human health and the environment. Such information, presented in a consolidated fashion, will assist agency decision-makers and the public in evaluating the proposed project's impacts and mitigation required to address those impacts.

**Monitoring and adaptive management**

The proposed project has the potential to affect resources for an extended period. As a result, EPA recommends that the project design include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. EPA recommends that the PEIS describe the monitoring program and its use as an effective feedback mechanism to adjust during construction, operation, and maintenance. EPA recommends incorporating lessons learned from past practices in developing, building and managing similar projects, combined

[19] In the mid-1850s, the United States entered into treaties with a number of American Indian tribes in Washington. These treaties guaranteed the signatory tribes the right to "take fish at usual and accustomed grounds and stations…in common with all citizens of the territory" [U.S. v. Washington, 384 F. Supp. 312 at 332 (WDWA 1974)].

with the need to account for new challenges, such as climate change, to help inform the design and management of the currently proposed project.

**Environmental Health Services Division**
401 Fifth Avenue, Suite 1100
Seattle, WA 98104
**206-263-9566** Fax 206-296-0189
TTY Relay: 711
www.kingcounty.gov/health

Public Health
Seattle & King County

U.S. Coast Guard
Shore Infrastructure Logistics Center – EMD
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

Re: Base Seattle PEIS; Docket Number USCG-2021-0183

June 17, 2021

Dear Mr. Dean Amundson,

Public Health – Seattle & King County (PHSKC) appreciates the opportunity to comment on the U.S. Coast Guard's early scoping for the Base Seattle Programmatic Environmental Impact Statement (PEIS; Docket Number USCG-2021-0183). Due to its current location, all three alternatives will require important considerations and we appreciate the additional stakeholder engagement that the Coast Guard has incorporated prior to creating a draft EIS. Because this is a scoping effort and the alternatives presented do not contain many details, PHSKCs has both questions and comments that we list below as bulleted points.

Overall comments:

- Under all three alternatives buildings 10, 12,1, 2 and its annex, and 6 will all be demolished. Demolition of buildings should account for building age and any hazardous materials like lead, poly-chlorinated biphenyls (PCBs) and asbestos for removal before demolition to prevent the release of these materials into the surrounding environment and waterway. Buildings built before 1978 contain lead paint risks, while buildings constructed between 1929-1979 often contain PCBs in the form of caulking, sealant, fluorescent light ballasts and paint. While no current regulations exist for lead or PCB abatement during demolition, WAC 296-155 requires that hazardous materials and chemicals be identified and eliminated prior to demolition:

  "(9) It shall be determined whether asbestos, hazardous materials, hazardous chemicals, gases, explosives, flammable materials, or similarly dangerous substances are present at the work site. When the presence of any such substance is apparent or suspected, testing and removal or purging shall be performed and the hazard eliminated before demolition is started. Removal of such substances shall be in accordance with the requirements of chapters 296-622 and 296-65 WAC."

  PHSKC requests that all measures possible be taken to prevent release of hazardous materials into the environment during demolition, including from fugitive dust and release to the soil and the East Waterway and Elliot Bay. We would like the draft EIS to include a description on how the demolition will be conducted so that waste that can be is recycled and toxic materials are separated out and disposed of properly.

- How will the construction activities impact the nearby environment? Given that the adjacent East Waterway will be undergoing cleanup actions in the near future, how will the Coast Guard contribute to both the cleanup and source control of the adjacent waterway and waterway sediments through each proposed alternative (assuming the each alternative will be tailored to adjust for the alternative chosen in EPA's Record of Decision for the East Waterway)? The different alternatives describe acquisition of existing berths and/or development of new piers. All alternatives describe that the Coast Guard, in conjunction with EPA, is undertaking a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action in Slip 36 including removal of contaminated sediment, source material, and removal/replacement of shoreside structures obstructing the removal action. While actions for this cleanup and source control will be included in the draft PEIS, PHSKC requests that additional information be for areas outside of Slip 36. It is unclear how the PEIS will include or reference sediment cleanup in areas adjacent to the alternatives presented, especially for areas that overlap with locations where sediment contamination is currently expected to be dredged and capped.

- Besides serving as the base for the Coast guard's Pacific Northwest and Polar areas of operation, and as the homeport for several Coast Guard cutters, it is not clear what activities will take place at the site as part of daily operations. Please provide description of regular and ongoing activities will take place at the site that may impact the environment and the cleanup of the adjacent superfund site on the East Waterway. For example, will there be regular maintenance or training events, such as firefighting training, that could release chemicals at the site? Please identify sources of pollution and the actions that the Coast Guard will take to prevent additional contaminants from entering into the surrounding soil, water and air during normal operating activities at the site.

- All proposed alternatives include an increase in site capacity. This will likely result in increases in energy/fuel use at the site. PHSKC recommends that the Coast Guard improve energy efficiency and reduce greenhouse gas emissions while conducting this upgrade. If possible, PHSKC recommends that that the Coast Guard strive to maintain or decrease energy use/green house gas emissions. This could be achieved through use of electric vehicles onsite and more energy efficient processes.

- PHSKC recommends that the Coast Guard build into all proposed alternatives a description of how projected climate impacts at the site will be addressed, and how the Coast Guard will address contaminant cleanup and source control that may result from climate induced events at the site?

- Alternative 2 would involve acquisition of Terminal 30, which include Jack Perry Memorial Park. This park is the only public access to the East Waterway north of the Spokane street bridge. The description provided for Alternative 2 does not describe what will happen to this park if acquired by the Coast Guard. What mitigation will be considered if Alternative 2 is considered and public park access is lost? If the Coast Guard intends to maintain the park in the same location, will it remain publicly accessible? During the site development will the park be updated and improved? If not, does the Coast Guard have plans to move this park to another location on the waterway?

- Because additional parking will be added for staff at the site, and some public parking removed (depending on the alternative), we recommend that the Coast Guard provide a justification for any public parking that is lost, and propose alternatives that either maintain public parking, or provide alternatives that will allow for increased, yet convenient, public transportation to the area.

PHSKC is pleased to see that many of the existing utilities at the site will be modernized and upgraded, including the storm sewer, potable water, sanitary sewer, natural gas, electrical and communications. We encourage the Coast Guard to include thorough descriptions of these improvements in the PEIS, so that it is clear how these improvements will reduce impacts to the environment, the East Waterway and Elliot Bay.

Thank you once again for the opportunity to provide comment. We look forward to reviewing the draft PEIS once it is completed. If you have any questions, please do not hesitate to reach out to our public health toxicologist, Dr. Shirlee Tan at shirlee.tan@kingcounty.gov.

Respectfully,

Darrell A. Rodgers, PhD, MPH, EMBA
Director, Environmental Health Services
Public Health – Seattle & King County
darrell.rodgers@kingcounty.gov

cc: Jeff Stern, Sediment Management Program, Department of Natural Resources and Parks, King County, WA

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PUBLIC SUBMISSION

# Comment Submitted by Dan Diiulio

Posted by the **Coast Guard** on Jun 17, 2021

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It appears at least one of your preferred alternatives will result in a loss of public access to Jack Perry Park. This is a vital waterfront access point for the citizens of Seattle; if public access to this area is rescinded, it must be replaced in kind or in an improved state at a nearby location.

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USCG-2021-0183-0012

**Tracking Number**

kq1-k89v-k7fv

**Comment Details** | **Submitter Info**

**Received Date**

Jun 16, 2021

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PUBLIC SUBMISSION

# Comment Submitted by Kevin Clark

Posted by the **Coast Guard** on Jun 17, 2021

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I live on the east side of Beacon Hill overlooking the current Coast Guard Base, and 43 ago I worked a year for a steamship company at the old Pier 37 just north of it. My late father helped build the Polar Star and Polar Sea at the old Lockheed Shipyard on Harbor Island in the 1970s. I have no financial stake in this project except as a taxpayer.

In addition to mitigation measures to protect Elliott Bay and its fisheries, I suggest you incorporate public education into your project scope.

Although currently on pause, I expect the Port of Seattle will eventually build a new cruise ship terminal at the north half of Terminal 46. An expanded USCG base onto the south half of that terminal could not only complement a cruise ship terminal, combined they could anchor the south end of Seattle's new makeover of the central waterfront. See attached newspaper article for photos, and imagine visually anchoring the south end of the artists' depictions.

The USCG is the most often overlooked branch of the United States military, especially here in Seattle. Whatever rebuilding you do in this project, it should help to rectify that with a public education welcoming center. History displays and interactive screens could explain the range of important services the USCG provides in Puget Sound, the Gateway to Alaska, and the entire 13th District. The Klondike Gold Rush National Historical Park could be a partner with USCG and the Port in this, along with other maritime and fishing organizations. USCG recruiting should participate also. If you want public support for your budgets, you must show the public what they are getting for their tax dollars!

Lastly, I urge you to work with the City of Seattle's Waterfront Redevelopment on integrating your project with theirs. I would love to see USCG incorporate a major artwork welcoming people to the new waterfront. This would be an opportunity to pay tribute to local Native American tribes, the first seafarers who plied these waters.

Good luck with your project!

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USCG-2021-0183-0013

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kq1-kcxp-wpve

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THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

TRANSMITTED BY EMAIL

June 18, 2021

United States Coast Guard
Infrastructure Logistics Center
Environmental Management Division
Attn: Mr. Dean Amundson
BaseSeattlePIES@uscg.mil

RE: Notice of Intent to Prepare a Programmatic Environmental Impact Statement- Request for Scoping Comments on Proposed Modernization of Coast Guard Base Seattle (Docket # USCG-2021-0183)

Mr. Amundson,

USGC Base Seattle and Elliot Bay are within the Suquamish Tribe's adjudicated usual and accustomed fishing area ("U&A") arising under the 1855 Treaty of Point Elliott. The Tribe reviews projects and regulations which might affect the health and sustainability of tribal resources and that may impact treaty-reserved rights. This letter serves to transmit the initial comments of the Suquamish Tribe (the "Tribe") concerning the Coast Guard's PEIS for the Modernization of Base Seattle.

Consultation

Thank you for your letter dated 18 May 2021 inviting government-to-government consultation on this proposed project. As acknowledged in the "Summary of Expected Impacts," each of the proposed action alternatives will likely impact Tribal cultural resources and Tribal fishing rights. In addition, each of the proposed action alternatives will likely impact water and sediment quality, nearshore habitat, and fisheries resources important to the Tribe. The Tribe welcomes the opportunity for continuous and ongoing consultation with the Coast Guard throughout the decision-making process, including further development of the action alternatives and assessment of potential impacts.

CERCLA

Although the Coast Guard states that cleanup actions pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) are beyond the scope of analysis for the PEIS, such actions are consequential to the Tribe with the potential to impact resources (including cultural, fisheries, and natural resources) and treaty rights of the Tribe. The Tribe requests that the Coast Guard consult and closely coordinate with the Tribe regarding any proposed CERCLA cleanup actions and/or non-time-critical removal actions proposed under CERCLA, including, but not limited to development of an Engineering Evaluation/Cost Analysis (EE/CA). Please include the Tribe in distribution of documents, memos, or agency meetings associated with cleanup actions related to this proposed project, including, EE/CAs.

Contamination outside the boundary of the East Waterway CERCLA cleanup site

Each of the action alternatives may include construction activities that extend outside the boundary of the East Waterway CERCLA site. Potential contamination (and sources of contamination) in areas outside the East Waterway CERCLA site (including uplands) but within the footprint of any of the action alternatives should be considered as part of the PEIS process. Such areas may require non-CERCLA cleanup or remedial actions to address potential impacts and risks, including potential impact on Tribal resources (including cultural, fisheries, and natural resources) and treaty rights. The PEIS should address impacts from potential contamination outside the boundaries of the East Waterway CERCLA site and how these activities will be coordinated with other cleanup related actions.

Vessels

The PEIS should address the following regarding vessels and vessel traffic at the expanded facility for each of the action alternatives:

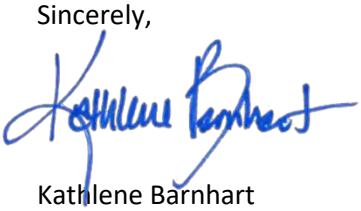
- Include images and sizes of vessels at their anticipated moorage locations, with discussion on the size and location-specific impacts of the vessel (shading, scour, etc.).
- Include the anticipated number of vessel trips per year for the stationed vessels and general activity levels.
- Discussion of any new exercises anticipated under each expansion alternative due to the increase in vessels, personnel, and/or facilities.

Impervious Surfaces and Overwater Coverage

The alternatives currently presented have varying degrees of impervious surfaces and overwater coverage. The Tribe anticipates that each alternative will provide a clear analysis of existing and proposed changes to impervious surfaces and stormwater management. Since each alternative includes additional or new parking areas, please include analysis of parking structures vs. surface parking. For example, the Tribe does not believe that employee parking is a water dependent use. Parking, even when in support of water dependent uses, is not a preferred use under the Washington State Shoreline Management Act. It will be important to minimize impacts from parking, along with stormwater on critical saltwater habitats in order to demonstrate consistency with the Coastal Zone Management Act (and the states Shoreline Management Act), Endangered Species Act, Marine Mammal Protection Act, Clean Water Act, and Clean Air Act.

Thank you for the opportunity to comment on the PEIS scoping notice for the Base Seattle Modernization and consideration of the Tribe's concerns. The Tribe requests a staff level meeting to discuss details of this comment letter. The Tribe looks forward to additional communication and consultation with the Coast Guard during development of the PEIS. If you have questions or concerns, please don't hesitate to email at kbarnhart@suquamish.nsn.us. Please include me in future communications to the Tribe regarding this project.

Sincerely,



Kathlene Barnhart
Ecologist, Suquamish Tribe

Cc: Andrew Connor, Tribal Liaison
U.S. Coast Guard 13th District
International, Tribal & DHS Liaison

ILWU Local 19
c/o Rich Austin, President, president@ilwulocal19.org
Dan McKisson, ILWU-WADC President, danmckisson@yahoo.com
3440 East Marginal Way, Seattle WA 98124

U.S. Coast Guard, Shore Infrastructure Logistics Center,
Environmental Management Division,
Attn: Mr. Dean Amundson,
1301 Clay Street, Suite 700N,
Oakland, CA 94612-5203.

Regarding: PEIS for Coast Guard Base Seattle in Seattle, Washington
Document Citation 86 FR 24637
Docket Number, public comment (scoping) USCG-2021-0183

The ILWU represents over 1,000 active workers who are employed at marine cargo terminals and cruise ship facilities in the Port of Seattle. We are involved in almost all aspects of terminal and ship operations, from on board ship work, to equipment operations on the marine terminals, to vessel planning and cargo processing gate operations. Our workforce depends upon parking, as job assignments generally can't be planned through other commuter modes for our dispersed workers.

Our organization was formally chartered in 1937 and our union workforce has maintained a continuous organized presence on Seattle's waterfront for well over a century. These jobs are crucial to our members' ability to support their families as the local costs of housing continue to rise. Over the years, Terminal 46 has been a critical facility for marine cargo for Washington's exporter customers, local goods distribution, cargo supply chains which service the Pacific Northwest and the Midwest, as well as our members' employment.

This letter constitutes our public comment for the purposes of scoping, for the above referenced PEIS scoping. Comments concerning construction and operation will be included.

**Construction**

The construction footprint will operate beyond the footprint of each of the proposed expanded operations. This will impact uses around the adjacent marine terminals (Terminal 46, Terminal 30, Terminal 18) in obstructions or other impacts of identified Major Truck Streets/Heavy Haul Corridors (See City of Seattle Freight Master Plan) for cargo movement to the BNSF SIG rail yard entrances, access to the highway system (SR 519, "little h" SR99 bypass, SR99 tunnel, I-5

& I-90), terminal to terminal transportation of cargo and equipment (T5, T18, T30, T46) and local destinations for both cargo and trucks (SoDo, Georgetown, Tukwila.)

The construction impact will affect the timely access for employees to the aforementioned facilities, particularly from the ILWU dispatch hall at 3440 East Marginal Way. Interruptions of cargo movement and employee access will directly impact the operations of the marine terminals. Waterway access to the constriction site will conflict with shipping schedules and berthing of vessels involved in the marine terminal and impact the supply chain beyond the area of the Port of Seattle and even Washington State.

The above construction impacts on marine terminal activities, freight routes, rail terminal access, highway access, and gate operations for cargo should be included in the PEIS scoping. Impacts on employee access to these facilities should also be included.

**Operations**

The operational footprint and parking for personnel in each of the action alternatives will constrain marine cargo use, or potential use, and capacity for Terminals 46 and 30. Physical security from hazardous cargo and unauthorized persons for the facility and vessels will also have an impact of adjacent operations. The expanded USCG vessel operations footprint will affect capacity for cargo ships and bunkering operations in the East Duwamish Waterway. These impacts will reduce supply chain reliability for ship and shore side for USCG adjacent or near adjacent marine cargo operations. These impacts should be included in the PEIS.

In the event that vessel maintenance, repair and/or rebuild will be done at the new base, what will be the impact of the above?

What will be the impact on the above on increased activities to support USCG operations, eg number of personnel, supply chains, medical facilities, parking, etc., and associated vehicle counts?

**Other Concerns**

Terminals 30 and 46 are on lands that are considered liquefaction zones during seismic events. The current facility is approximately 1/4 mile from a major seismic fault which runs east-west to the south. What will be the impact on USCG related operations and the ability to support ship assist operations?

What are the national security implications of a seismic event in any of the proposed alternatives, in comparison to a zero or near zero risk of a seismic event at another site alternative?

Terminals 30 and 46 are zoned for heavy industry per the city of Seattle. If the facility will include housing, what will be the impacts on the residents of the units, and what impact will the change of use have on adjacent industrial uses,/zoning and Major Truck Street capacity?

Building the facility in another location would mitigate many of the above impacts. These other locations include:

Terminals (Piers) 1 and/or 2 in West Seattle
Terminal 10, Harbor Island, Seattle

Old Fisher Flour Mill property, Harbor Island, Seattle
Terminal 20, Duwamish East Waterway, Seattle
Terminal 90/91 (with adjacent Port owned uplands)
Former Unocal bulk fuel facility, Point Wells, Unincorporated Snohomish County
On or near former Kimberly Clark property, Port of Everett
Port of Olympia
Hylebos Waterway (Alexander Ave), Port of Tacoma
Port of Bellingham

We ask that each of these locations be considered as additional alternatives for the Draft PEIS.

Best Regards,

ILWU Local 19
206-623-7461

[Prepared by John Persak, john.m.persak@gmail.com]

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PUBLIC SUBMISSION

# Comment Submitted by Eric vonBrandenfels

Posted by the **Coast Guard** on Jun 20, 2021

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Department of Homeland Security
Coast Guard
Docket Number USCG-2021-0183

RE: Base Seattle PEIS Public Comment

To whom it may concern:

We the undersigned Captain Eric vonBrandenfels, from the Puget Sound Pilots are writing in support of the Maritime Institute of Technology and Graduate Studies “MITAGS” (formerly known as Pacific Maritime Institute), located at 1729 Alaskan Way South in Seattle.

We understand that the Department of Homeland Security has proposed a modernization of Coast Guard Base Seattle, in which two of the three options require the school to be removed. Although we fully support the Coast Guard’s need to modernize, there needs to be some accommodation in order not to lose the school. This could be to select an option that allows the school to remain, or provide financial assistance for moving the school to a nearby location and properly outfitting the facilities.

MITAGS provides US Coast-Guard-required safety and survival training to mariners, who often serve as emergency first responders aboard their vessels. We depend on MITAGS’ first aid, survival, firefighting, hazardous materials, and other emergency response courses to help our employees react appropriately and minimize the risk to life and property.

The School is equipped with three advanced ship and tug simulators. Mariners use the simulators to enhance their skill sets for safe navigation. The training greatly mitigates the risks of groundings, collisions, and allisions. MITAGS also offers an award-winning Navigation Skills Assessment Program, NSAP®. This program helps maritime companies pre-qualify deck officers prior to employment and evaluate the skills of officers already in service.

Pilot organizations, including the Puget Sound Pilots, use MITAGS to help select and train their personnel. They also regularly use the simulators for navigation studies to evaluate whether it is safe and under what conditions for new vessel classes to transit.

MITAGS is a significant asset to the Pacific Northwest. In addition to training local mariners, it serves as an economic engine that draws professional mariners from all over the world. Its services cannot be obtained anywhere else in the region. If MITAGS was to shut its doors, it would negatively impact the local and regional maritime community.

In summation, MITAGS provides essential maritime services. We respectfully request that the DOHS consider options that would ensure this important maritime asset remains part of the Seattle Maritime Community.

Sincerely,
Eric vonBrandenfels Puget Sound Pilot

**Comment ID**

USCG-2021-0183-0016

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PUBLIC SUBMISSION

# Comment Submitted by President Ivan Carlson Jr., Puget Sound Pilots

Posted by the **Coast Guard** on Jun 20, 2021

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Puget Sound Pilots is a local association of 52 state and federally licensed marine pilots who are the main providers of pilotage services to commercial vessels that call within the Puget Sound area. As State licensed pilots we are mandated by the Legislature of Washington State to provide waterborne commerce with safe navigation within the waters of our State. Each member of the association holds a State Pilotage license, as well as being a USCG licensed Master and the requisite First Class Pilotage Endorsements for the area. The service we provide is to ensure the safe passage of every deep draft foreign vessel, the majority of deep draft U.S. flag vessels, to and from the berths and anchorages of our district, from the Canadian border south through to Olympia.

Puget Sound Pilots holds in high regard the significant role the Coast Guard provides in our region. We understand the needs of the Coast Guard to modernize their facilities in Seattle. However, we have concerns regarding the unintended impacts an expansion may create. Our primary concern with the proposed expansion and modernization of the USCG Base Seattle is with creating further restrictions of the navigable width of the East Waterway. Alternatives 2 and 3 of the PEIS involve construction of new berths in and on the approaches to the East Waterway. The proposed new berth in the waterway would be located adjacent to busy container piers and an oil terminal on Harbor Island. Over the last several years the size of ship that regularly calls on the berths of East Waterway have increased dramatically minimizing the maneuvering room necessary to safely navigate the waterway. The reconstruction of the piers and their eventual use for mooring vessels could constrict the navigable waterway further, thereby increasing the risks when mooring tankers and large container vessels in the waterway. As the proposals are described,

alternative 1 would still reduce the navigable area, though it would be potentially less restrictive for vessel transits in the waterways than alternatives 2 or 3.
Puget Sound Pilots looks forward to further discussions regarding the modernization of the Coast Guard Homeport in the Seattle area. Please feel free to contact us for further discussion.

Kind Regards,

President Ivan Carlson Jr.

Puget Sound Pilots
2003 Western Ave, Suite 200
Seattle, WA 98121
Cell: 360-421-0583
Office: 206-518-5444

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King County
Department of Natural Resources and Parks
**Wastewater Treatment Division**
King Street Center, KSC-NR-5505
201 South Jackson Street
Seattle, WA 98104-3855

June 21, 2021

sent via email: BaseSeattlePEIS@uscg.mil
OAP Ref No. 1848

Dean Amundson
United States Coast Guard
1301 Clay Street, Suite 700N
Oakland, CA 94612

Dear Dean Amundson:

The King County Wastewater Treatment Division (WTD) has received the scoping notice on the intent to prepare the Programmatic Environmental Impact Statement (PEIS) for the United States Coast Guard: Base Seattle PEIS project (Docket Number: USCG-2021-0183). The project proposes to make improvements over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

**King County has facilities, the Kingdome trunk, the Connecticut regulator station, and the Connecticut stormwater return adjacent to Terminal 46. These facilities are part of the Combined Sewer Overflow (CSO) control system operated by King County WTD to reduce CSO's. King County WTD needs to have full time access to these facilities during any construction activity in the vicinity and during eventual operation of any potential proposed adjacent facilities. We have enclosed figures showing the general location and size of our facilities. Please note the City of Seattle owns and operates the infrastructure conveyance lines, maintenance holes and outfall beyond the Connecticut regulator station.**

In order to protect wastewater facilities during construction and eventual operation of United states Coast Guard facilities, **WTD requests that United States Coast Guard submit decisions resulting from the NEPA process**, so that WTD can assess potential impacts. The Local Public Agency Program is available to meet with your representatives if you would like more detailed information on the WTD facilities and their operation. Please send information and inquiries to:

Local Public Agency Program
King County WTD, Engineering and Technical Resources
201 South Jackson Street, KSC-NR-5500
Seattle, WA 98104-3855
(206) 477-5414 / lpa.team@kingcounty.gov

Due to the proposal's current location, all three alternatives will require important considerations and we appreciate the additional stakeholder engagement that the Coast Guard has incorporated prior to creating a draft PEIS. Because this is a scoping effort and the alternatives presented do not contain many details, King County WTD's Sediment Management Program has both questions and comments regarding activities that impact the nearby environment.

Given that the adjacent East Waterway will be undergoing sediment cleanup actions in the near future, how will the Coast Guard contribute to both the cleanup and source control of the adjacent waterway and waterway sediments through each proposed alternative (assuming each Coast Guard alternative will be tailored to adjust for the cleanup alternative chosen in EPA's Record of Decision for the East Waterway Operable Unit of Harbor Island Superfund Site)? The different alternatives describe acquisition and updates of existing piers and/or development of new piers and adjacent berthing areas. All alternatives describe that the Coast Guard, in conjunction with EPA, is undertaking a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action in Slip 36 including removal of contaminated sediment, source material, and removal/replacement of shoreside structures obstructing the removal action. While actions for this cleanup and source control will be included in the draft PEIS, WTD requests that additional information be included for areas outside of Slip 36. It is unclear how the PEIS will propose to include or coordinate with sediment cleanup in areas adjacent to the alternatives presented, especially for areas that overlap with locations where sediment contamination is currently expected to be dredged and capped. Please send inquiries regarding sediment contamination to:

Jeff Stern
King County WTD, Sediment Management Program Lead
201 South Jackson Street, KSC-NR-5505
Seattle, WA 98104-3855
(206) 477-5479 / jeff.stern@kingcounty.gov

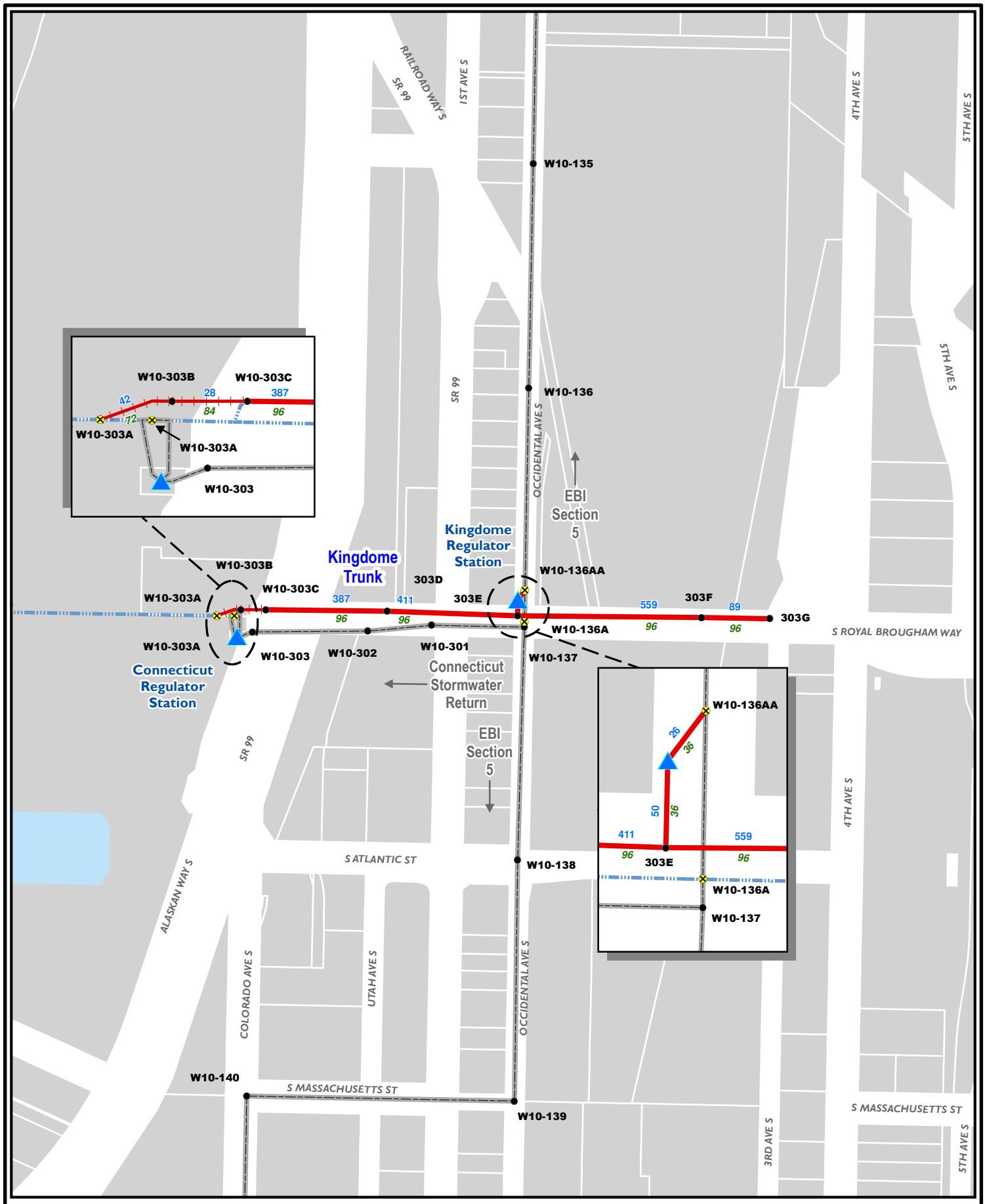
Thank you for the opportunity to review and comment on this proposal.

Sincerely,

Bailey Pfeiffer
Environmental Planner

e-cc: Mark Lampard, King County WTD, Local Public Agency Coordinator
Debra Williston, King County WTD, Sediment Management Program
Jeff Stern, King County WTD, Sediment Management Program
Shirlee Tan, King County Public Health, Environmental Health Services

Enclosures




King County
Department of
Natural Resources and Parks
**Wastewater Treatment Division**

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# Kingdome Trunk

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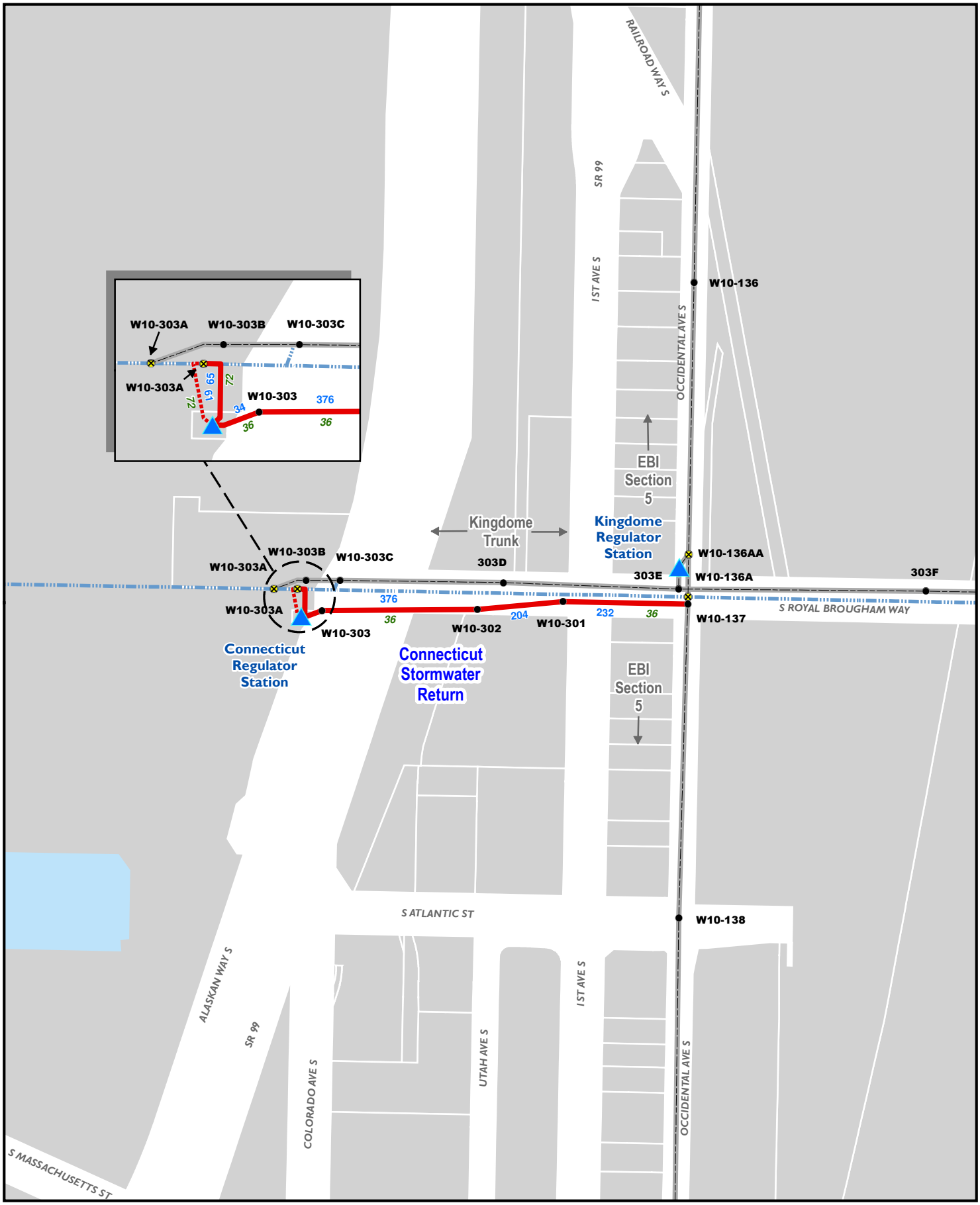


King County
Department of
Natural Resources and Parks
**Wastewater Treatment Division**

N

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Feet

# Connecticut Stormwater Return

*WW*CONNECTI*

ALLIANCE FOR PIONEER SQUARE

June 21, 2021

Submitted via scoping portal

United States Coast Guard
Shore infrastructure logistics center
Environmental Management Division
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700 N
Oakland, CA 94612,5203

**Re: Scope of the Programmatic EIS for modernization and expansion of Coast Guard Base Seattle in Seattle, WA (Federal Register Number 2021-09523).**

Dear Mr. Amundson:

The Alliance for Pioneer Square appreciates the opportunity to have input into the scope of this important environmental document. The Port of Seattle, the Seattle Waterfront, and the Stadium district are critically important neighbors to the Pioneer Square community, and we seek to build relationship with our Base Seattle neighbors. The US Coast Guard's proposal to expand Base Seattle has the potential to alter the transportation and economic fabric of the Pioneer Square community. Our collaboration together will determine the quality of those alterations. We ask to be made parties of record and receive all future notices pertaining to this proposal.

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## II. Scope of the Programmatic EIS for Base Seattle Expansion

With that foundation as to the affected environment that the Base Seattle Expansion project will impact, the EIS must address the following issues.

### A. Project Area Definition

While the project itself proposes three alternatives to acquire and redevelop a portion of Terminal 46 which is located just outside the Pioneer Square Historic District boundary, the resulting industry and activity from construction and development will have a direct impact on the neighborhood and historic district resources. The construction resources needed to complete this project will add to an already burdened transportation system, which increased along the Port of Seattle and Pioneer Square areas due to tolling implementation on the new SR 99 tunnel. The US Coast Guard must consider the full range of both operational and construction impacts of the project on the neighborhood for all transportation, built, and natural environment disciplines studied in the EIS. These disciplines include, but are not limited to; transportation, land use, acquisitions and relocations, noise and vibration, economics, visual resources, parks and recreation, energy, air quality, greenhouse gas emissions, public services, historic and archeological resources, social resources, community facilities, environmental justice, utilities, ecosystems, water resources, and geology and soils.

### B. Transportation Analysis

The EIS must address how the Base Seattle Expansion will change the types of transportation trips and uses in and around the Pioneer Square neighborhood. The transportation analysis must be realistic in the assumptions used about how workers, military personnel and families, and supplies will access the expanded base. The Biden administration has publicly committed to addressing global warming, and transportation emissions are one of the greatest contributors to this crisis. The City of Seattle has been working to address these issues, and has policies and programs in place to discourage and help reduce the number of single occupant vehicles traveling into and through the City in an effort to reduce traffic congestion as well as greenhouse gas emissions. The Base Expansion proposal includes several acres of new parking, and this need should be more fully evaluated and the impacts should be studied to fully understand the contribution Base traffic and operations will have on the transportation system.

The baseline for the transportation analysis must be transportation conditions on game or event days in the Stadium District. Mariners games bring crowds and traffic to the immediate vicinity of Base Seattle and Terminal 46 at least 80 days per year. The Sounders FC season has up to 20 home games and the Seattle Seahawks season can include 10 home games, with the result being that there are games or events in the Stadium District at least a third of the days during the year. Those are existing conditions that create near gridlock on a recurring basis, and for which impact from Base Expansion will be a cumulative impact. It is unrealistic to consider the transportation impacts of Base Expansion and operations on non-game/event days, because it is the impact on game/event days that will create the most significant adverse impacts.

For decades now, the Alliance for Pioneer Square has been working to balance the demands of King County Metro buses coming to and from Downtown from West Seattle and other South End communities because bus traffic prevents Pioneer Square from experiencing one of the most important benefits of the City's Alaskan Way, Promenade and Overlook Walk Project (AWPOW) until Sound Transit's West Seattle/Ballard Link Extension project is opened. One of the major objectives of AWPOW was to "reconnect" downtown Seattle to its waterfront, by creating a pedestrian friendly boulevard along Alaskan Way. As Seattle's original downtown neighborhood, it is particularly appropriate that AWPOW reconnect Pioneer Square to the historic central waterfront along Elliott Bay. Pioneer Square property owners are slated to receive special assessments to help pay for AWPOW, and as a result are entitled to receive commensurate special benefits from that project. But because of Metro's need to bring approximately 650 bus trips per day along SR 519/Alaskan Way, the design of the new Alaskan Way south of Columbia

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> 1. When the extension of Sound Transit Light Rail to the West Seattle Alaska Junction Station (or, if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016) is completed and open to service, Metro will, subject to King County Code Section 28.94.020 as currently adopted or hereafter amended, reduce bus volumes on Alaskan Way south of Columbia Street and on Columbia Street, west of Third Avenue, to not more than 195 buses per day, or 30% of the currently estimated total of 650 trips per day. Upon commencement of the Sound Transit Light Rail operations to West Seattle, the Parties and other stakeholders, including the Port of Seattle, will convene to evaluate the corridor's overall function along with the location of bus stops and signage, along the SR 519/Alaskan Way surface street and Columbia Street, and may make recommendations to the appropriate governing bodies or executives regarding opportunities for adjustments and improvements.
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Alaskan Way and Third Avenue, to facilitate local access and will maximize opportunities to restore parking, loading and building access that were reduced as part of changes directing Metro buses onto Columbia Street.

The EIS must recognize those conditions and commitments in their EIS analysis where applicable (transportation), and address how the US Coast Guard could assist the Port of Seattle to bring them to fruition, and reduce the burden additional military traffic and operations will add to the roads in and adjacent to Pioneer Square.

### C. Parking

Pioneer Square has endured more than two decades of major construction designed to improve transportation and transit in the region. The Sound Transit Regional Transit Authority is currently evaluating alternatives to deliver the West Seattle/Ballard Link Extensions project—which will add more robust high capacity transit to the Pioneer Square neighborhood. Transit and transportation improvements around Pioneer Square have come at a cost to parking resources in and around the neighborhood. At a time when the City of Seattle is aggressively working to discourage single occupant travel into and through the City, and while the Biden administration is simultaneously battling climate change with transit investments, we ask the USCG to critically evaluate the amount of parking necessary in their proposed project, and to leverage transit options available now and in the future.

### D. Construction Impacts

It is essential that the EIS carefully analyze the construction impacts on transportation, parking, business and residential access, emergency services, vibration, noise, and air quality.

As a gateway neighborhood to and from Seattle in the South, Pioneer Square often sees many haul trucks with materials and machines pass through the neighborhood along 1st Avenue S., 2nd Avenue S., and Yesler. Increased construction traffic from viaduct demolition, tunnel construction, utility relocations in preparation for the Waterfront project, and other area developments, combined with bus traffic through the neighborhood, are accelerating irreparable wear and tear on historic areaways along the corridor, and further eroding the pedestrian and public realm retail environment. It is unclear how much traffic will increase during the Base Seattle Expansion project, and the EIS must study alternatives to avoid first, then minimize, traffic through Pioneer Square during construction. Major public projects will have significant adverse impacts on the communities that must endure them, but the function of the EIS is to disclose those impacts, consider alternatives that will reduce the impacts, and identify what mitigation measures may limit the scope of the damage.

The EIS must carefully study potential mitigation opportunities to address the cumulative impact of this construction proceeding in the midst of other major projects.

### E. Public Realm, Land Use and Urban Design

The Alliance for Pioneer Square has worked for decades with WSDOT and the City of Seattle to reintegrate Pioneer Square with Seattle's waterfront through iterative design efforts, public process, and close collaboration to envision and develop the public realm and land use connections in and around the neighborhood. The Alliance has required the dedicated work of the Executive Director and staff members to ensure the projects reflect the proper designs and scale

of the project, and ensure that construction of the project does not erode the economic, cultural, or historic fabric of the neighborhood they are trying to create connections and access to. This decades long effort to reimagine the connections between the neighborhoods was required to ensure that transportation planners did not disregard the needs of the neighborhood. In order for ground level retail businesses to thrive, they must be able to receive deliveries and have a way for the customers to pick up or load their wares. Businesses rely on people's ability to get to and through the neighborhood by car until a more robust public transportation is realized.

The Base Seattle expansion offers an opportunity to continue integrating the iconic working waterfront in with the surrounding communities. Often, the security required to support military installations can render the facilities feeling separate from the surrounding community, and can seem to fragment or separate. Joint Base Lewis McChord is an important and welcome installation in Washington State. However, for people not associated with the base, living near it, or traveling through the base can feel like interacting with a separate, and even unwelcoming place. Visitors or neighbors can feel like they "don't belong" in or near the facilities. With all the investment and focus on integrating communities and neighborhoods throughout Seattle, and with the billion dollar investment into a waterfront for all, we ask the USCG to consider the urban fabric of the surrounding neighborhoods, avoiding a project that sticks out like a sore thumb, and an expansion that further isolates the Base from its surroundings. We hope the Base Seattle expansion can deliver something that looks and feels like it belongs on the new Seattle Waterfront, at the intersection of community and industry, next to historic Pioneer Square.

The scoping document indicates that USGS is seeking to resolve incompatible land uses as part of the expansion, and it is unclear from our initial review what that means. A more robust discussion of current and future land uses, and the codes that conflict with those uses, must be disclosed and studied in the EIS.

### F. Utilities, Energy, and Greenhouse Gas Emissions

The scoping document describes expanded cutter operations at the Base, and increased need for parking for base employees and users. These types of operations are typically fuel intensive, and contribute substantially to greenhouse gas emissions in the region. The EIS should fully evaluate the construction of and future operations of the expanded Base Seattle, and seek to minimize energy and greenhouse gas emissions first, and propose ways of mitigating the remaining impacts.

The Port and Washington State Ferries are currently engaged in electrifying their waterfront resources, which is putting additional energy burden on the electrical utility along the waterfront. The EIS should study the utility needs for the project, and evaluate the impact on current utility systems and potential need to expand area utilities to support future base operations.

### G. Historic Resources and Section 106 Compliance

While the construction footprint of the project largely remains outside the physical boundary of the Pioneer Square Historic District, resources needed for construction and the intended use of the expanded Base Seattle will have a direct and substantial impact on the District. This federal action is required to comply with Section 106 of the National Historic Preservation Act. As stewards of the historic character and fabric of the neighborhood, the Alliance for Pioneer Square requests to be a consulting party to the Section 106 process for the Base Seattle Expansion

project(s). We hope to cultivate a relationship with the USCG and Base Seattle, to grow our relationship, and collectively work to preserve the resources we are charged with protecting.

Again, thank you for your consideration of these comments. The Alliance for Pioneer Square looks forward to working with you in the development of this important project.

Sincerely,

*Lisa Howard*

Lisa Howard
Executive Director
Alliance for Pioneer Square

ALLIANCE FOR PIONEER SQUARE

June 21, 2021

Submitted via scoping portal

United States Coast Guard
Shore infrastructure logistics center
Environmental Management Division
Attn: Mr. Dean Amundson
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The EIS must recognize those conditions and commitments in their EIS analysis where applicable (transportation), and address how the US Coast Guard could assist the Port of Seattle to bring them to fruition, and reduce the burden additional military traffic and operations will add to the roads in and adjacent to Pioneer Square.

### C. Parking

Pioneer Square has endured more than two decades of major construction designed to improve transportation and transit in the region. The Sound Transit Regional Transit Authority is currently evaluating alternatives to deliver the West Seattle/Ballard Link Extensions project—which will add more robust high capacity transit to the Pioneer Square neighborhood. Transit and transportation improvements around Pioneer Square have come at a cost to parking resources in and around the neighborhood. At a time when the City of Seattle is aggressively working to discourage single occupant travel into and through the City, and while the Biden administration is simultaneously battling climate change with transit investments, we ask the USCG to critically evaluate the amount of parking necessary in their proposed project, and to leverage transit options available now and in the future.

### D. Construction Impacts

It is essential that the EIS carefully analyze the construction impacts on transportation, parking, business and residential access, emergency services, vibration, noise, and air quality.

As a gateway neighborhood to and from Seattle in the South, Pioneer Square often sees many haul trucks with materials and machines pass through the neighborhood along 1st Avenue S., 2nd Avenue S., and Yesler. Increased construction traffic from viaduct demolition, tunnel construction, utility relocations in preparation for the Waterfront project, and other area developments, combined with bus traffic through the neighborhood, are accelerating irreparable wear and tear on historic areaways along the corridor, and further eroding the pedestrian and public realm retail environment. It is unclear how much traffic will increase during the Base Seattle Expansion project, and the EIS must study alternatives to avoid first, then minimize, traffic through Pioneer Square during construction. Major public projects will have significant adverse impacts on the communities that must endure them, but the function of the EIS is to disclose those impacts, consider alternatives that will reduce the impacts, and identify what mitigation measures may limit the scope of the damage.

The EIS must carefully study potential mitigation opportunities to address the cumulative impact of this construction proceeding in the midst of other major projects.

### E. Public Realm, Land Use and Urban Design

The Alliance for Pioneer Square has worked for decades with WSDOT and the City of Seattle to reintegrate Pioneer Square with Seattle's waterfront through iterative design efforts, public process, and close collaboration to envision and develop the public realm and land use connections in and around the neighborhood. The Alliance has required the dedicated work of the Executive Director and staff members to ensure the projects reflect the proper designs and scale

of the project, and ensure that construction of the project does not erode the economic, cultural, or historic fabric of the neighborhood they are trying to create connections and access to. This decades long effort to reimagine the connections between the neighborhoods was required to ensure that transportation planners did not disregard the needs of the neighborhood. In order for ground level retail businesses to thrive, they must be able to receive deliveries and have a way for the customers to pick up or load their wares. Businesses rely on people's ability to get to and through the neighborhood by car until a more robust public transportation is realized.

The Base Seattle expansion offers an opportunity to continue integrating the iconic working waterfront in with the surrounding communities. Often, the security required to support military installations can render the facilities feeling separate from the surrounding community, and can seem to fragment or separate. Joint Base Lewis McChord is an important and welcome installation in Washington State. However, for people not associated with the base, living near it, or traveling through the base can feel like interacting with a separate, and even unwelcoming place. Visitors or neighbors can feel like they "don't belong" in or near the facilities. With all the investment and focus on integrating communities and neighborhoods throughout Seattle, and with the billion dollar investment into a waterfront for all, we ask the USCG to consider the urban fabric of the surrounding neighborhoods, avoiding a project that sticks out like a sore thumb, and an expansion that further isolates the Base from its surroundings. We hope the Base Seattle expansion can deliver something that looks and feels like it belongs on the new Seattle Waterfront, at the intersection of community and industry, next to historic Pioneer Square.

The scoping document indicates that USGS is seeking to resolve incompatible land uses as part of the expansion, and it is unclear from our initial review what that means. A more robust discussion of current and future land uses, and the codes that conflict with those uses, must be disclosed and studied in the EIS.

### F. Utilities, Energy, and Greenhouse Gas Emissions

The scoping document describes expanded cutter operations at the Base, and increased need for parking for base employees and users. These types of operations are typically fuel intensive, and contribute substantially to greenhouse gas emissions in the region. The EIS should fully evaluate the construction of and future operations of the expanded Base Seattle, and seek to minimize energy and greenhouse gas emissions first, and propose ways of mitigating the remaining impacts.

The Port and Washington State Ferries are currently engaged in electrifying their waterfront resources, which is putting additional energy burden on the electrical utility along the waterfront. The EIS should study the utility needs for the project, and evaluate the impact on current utility systems and potential need to expand area utilities to support future base operations.

### G. Historic Resources and Section 106 Compliance

While the construction footprint of the project largely remains outside the physical boundary of the Pioneer Square Historic District, resources needed for construction and the intended use of the expanded Base Seattle will have a direct and substantial impact on the District. This federal action is required to comply with Section 106 of the National Historic Preservation Act. As stewards of the historic character and fabric of the neighborhood, the Alliance for Pioneer Square requests to be a consulting party to the Section 106 process for the Base Seattle Expansion

project(s). We hope to cultivate a relationship with the USCG and Base Seattle, to grow our relationship, and collectively work to preserve the resources we are charged with protecting.

Again, thank you for your consideration of these comments. The Alliance for Pioneer Square looks forward to working with you in the development of this important project.

Sincerely,

*Lisa Howard*

Lisa Howard
Executive Director
Alliance for Pioneer Square

June 21, 2021

Mr. Dean Admundson
United States Coast Guard Shore Infrastructure Logistics Center
Environmental Management Division

Re: Notice of Intent to Prepare a Programmatic Environmental Impact Statement
Request for Comments on Proposed Modernization of Coast Guard Base Seattle

Dear Mr. Admundson,

On behalf of the Port of Seattle (Port) and the Northwest Seaport Alliance (NWSA), we welcome the opportunity to review the U.S. Coast Guard's Notice of Intent to prepare a Programmatic Environmental Impact Statement regarding the proposed expansion and modernization of Coast Guard Base Seattle. We recognize the interest of the U.S. Coast Guard and our federal congressional delegation towards securing the polar security cutter mission for our region, especially given the growing strategic importance of the United States presence in the Arctic.

The nexus between the Port and NWSA operations and the project's alternatives is significant, thus we look forward to being closely engaged on your proposed infrastructure expansion. Through construction and subsequent operations, this project has the potential of impacting critical Port owned and NWSA managed facilities: Terminal 46, Terminal 30, Pier 34, and Jack Perry Park.

In 1911, the Port was authorized by the citizens of King County under Chapter 53 of the Revised Code of Washington to serve as a public port authority, charged with ensuring that Seattle's deep-water harbor is protected to serve as an economic engine for the region. In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership, NWSA, which is the fourth-largest container gateway in North America.

The Port and NWSA operate and maintain the more than $1 billion in investments made into maritime and industrial operations, and work to protect the tens of thousands of family-wage jobs and $4.0 billion in revenue that these sectors generate for the region and state. We manage assets of statewide significance, serving as critical gateways for the agricultural producers and manufacturers across Washington. These gateways cannot be replicated elsewhere and provide a crucial function in the resiliency of our state's economy.

For the Port and NWSA to be successful in our mission, it is critical that other jurisdictions and government agencies like the U.S. Coast Guard recognize the complicated nature of our operations and collaborate closely when major projects might impact our assets. These considerations should include possible impacts on existing maritime operations, the environment, tribal treaty rights, the public, and adjacent communities. Constant coordination

within the maritime industry ecosystem is critical for success and becomes more so with any significant shifts and impacts to an existing system.

We value the U.S. Coast Guard's long-term presence in the Seattle harbor and the critical role it plays to advance national security, maritime safety, environmental protection, and scientific research. We look forward to working with the U.S. Coast Guard, local, state, federal elected leaders, regional tribes, our Port partners, and other interested stakeholders so that the public and all maritime interests have adequate opportunity to understand and comment on the project.

Please find detailed scoping comments from our staff attached. Thank you for your consideration and we look forward to future collaboration and coordination around the proposed modernization of Coast Guard Base Seattle. Please do not hesitate to reach out to either one of us if we can be of service.

Sincerely,

Stephen P. Metruck
Executive Director
Port of Seattle

John Wolfe
Chief Executive Officer
The Northwest Seaport Alliance

Attachment A – Technical Comments

_____I_____ Request for Comments on Programmatic Environmental Impact Statement (PEIS) for Proposed Modernization of Coast Guard Base Seattle

Thank you for the opportunity to provide these scoping comments. We look forward to integral involvement in the environmental review of the expansion and modernization of U.S. Coast Guard Base Seattle. We request that the PEIS comprehensively analyze the issues raised in this letter and identify potential effects, along with opportunities to modify the project plans to avoid or minimize negative impacts. The comments are organized in the following fashion:

1. Purpose & Need
2. Locations
   - 2.1 Terminal 46
   - 2.2 Terminal 30
   - 2.3 Pier 34
   - 2.4 Jack Perry Park
3. Alternatives
   - 3.1 Alternative 1: Acquisition at Terminal 46
   - 3.2 Alternative 2: Acquisition at Terminal 30 and 46
   - 3.3 Alternative 3: Limited Acquisition at Terminal 46
4. Elements of the Environment and Potential Impacts

Staff contacts:


- Laura Wolfe, wolfe.l@portseattle.org
- Lindsay Wolpa, lwolpa@nortwestseaportalliance.com


**1**

The Northwest Seaport Alliance (NWSA) and Port of Seattle (Port) generally support the Purpose and Need statement. We expect that in this PEIS document, the U.S. Coast Guard will recognize the Port's mission, and communicate how it can deliver and operate any expansion in a manner that is compatible with existing public purposes for which The NWSA and Port are responsible.

Under state legislation, King County citizens voted in 1911 to create the public Port of Seattle – a special purpose municipal corporation, to ensure that harbor facilities were managed for the benefit of all citizens. In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership, NWSA, under the authority of chapter 53.57 of the Revised Code of Washington. The NWSA is the fifth-largest container gateway in North America. Regional marine cargo facilities are a major center for bulk, breakbulk, project/heavy-lift cargoes, automobiles, and trucks. The Port and NWSA's missions are to

create good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development.

The Growth Management Act (GMA) recognized the importance of port terminals by designating them as "essential public facilities" (RCW 47.06.140). The critical economic role of the marine cargo facilities was reinforced by the 2009 inclusion of the requirement for a Container Port Element, RCW 36.70A.085, for the cities of Seattle and Tacoma. This amendment to the GMA showed legislative support for the continued economic development generated by Washington's major ports by declaring that:

> "It is the intent of the legislature to ensure that local land use decisions are made in consideration of the long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems, and to ensure that container ports continue to function effectively alongside vibrant city waterfronts." (RCW 36.70A.85, [Findings—Intent—2009 c 514.])

Seattle's Container Port Element was finalized by the City of Seattle (City) in 2012 and is part of the current Comprehensive Plan (p. 168-170). Policy CP 1.6 discusses preserving freight access to the terminals and Policy CP 1.2 addresses protecting land near the port with zoning for port-related activities.

As these GMA elements illustrate, to be successful in the Port's mission, it is critical for other jurisdictions and government agencies like the U.S. Coast Guard to recognize the complex and interwoven nature of our operations to statewide economic health and collaborate closely when major projects might impact our assets.

Pursuant to the authority and mission referenced above, the Port has engaged in extensive local planning efforts to develop the Port's "Century Agenda" to articulate how the Port will deliver its mission. This critical public document focuses on the importance of the proximity of industrial lands to the region's urban center, establishing a goal to "Anchor the Puget Sound urban-industrial land use to prevent sprawl in less developed areas."

Because all current U.S. Coast Guard alternatives expand onto Port and NWSA-managed property, design and construction must respect the vitality and economic contributions of the maritime and industrial economic sectors. The proposed modernization has the potential to impede existing industrial capacity and capability and could foreclose future industrial facilities and operations. Port maritime and NWSA facilities cannot be moved or replicated elsewhere, due to their very nature, and impacting their operations jeopardizes a significant economic and employment engine for the region and state.

Industrial land, in particular maritime industrial land, is a scarce resource in Seattle. As context, Washington's Shorelines Management Act (Chapter 90.58 RCW) arose out of the recognition that shorelines areas are a scarce resource and a resource that affects nearly

everyone. Hence, the act is implemented through mandates on local government to balance three goals of shorelines management: 1) providing for uses that require a shoreline location, 2) protecting ecological function, and 3) providing public access to shorelines. Alternative selection for Base modernization must be mindful of the fact that

.

In keeping with the comments above, the Port and NWSA propose integrating the following into the purpose and need as well:

- Recognize other critical public institutions and purposes by partnering effectively to plan, deliver, and operate the project in a manner that is compatible with existing and planned economic development uses along the Maritime Industrial Waterfront and the freight infrastructure supporting them.

The NWSA and Port believe that the U.S. Coast Guard will need to develop this plan in cooperation with multiple agencies and other stakeholders with individual public missions. The Port and NWSA support the U.S. Coast Guard 's mission and expect that the U.S. Coast Guard will commit to implementing the projects in a manner that maintains the Port's and NWSA's ability to responsibly carry out our own mission and responsibilities to the public we all serve, as we pledge to work with fellow agencies to find the best mutually beneficial outcomes.

## 2 I

Appendix 1 and 2 provide a general map of the NWSA-managed Port-owned facilities. This section provides a quick description of current facilities and operations that could be relocated or disrupted by the U.S. Coast Guard proposal.

### 2 1

Terminal 46 (Appendix 1) has been in its current physical configuration since 1980. It is situated at the edge of a City-designated Manufacturing Industrial Center (Duwamish Manufacturing Industrial Center). For decades, the approximately 86-acre terminal site has been used as an international marine cargo terminal and was designed and permitted to accommodate throughput of up to 600,000 TEUs per year. Prior uses included berthing of cargo barges and moorage of large catcher/processor fishing vessels. Most recently, the facility and the north side of Terminal 46 uplands were used in support of large transportation projects, specifically the spoils removal barge operations for the SR99 Seattle Waterfront Tunnel. Three 100-ft. gauge container cranes are presently used for cargo handling, although up to six cranes have been used in the past. The facility has two operating deep-water shipping berths in the west part of the site. The truck gate located in the site's southeastern corner has nine inbound and eight outbound lanes.

## 2 2

In 1986, Terminal 30 (Appendix 2) was developed into a marine container terminal and was active throughout the 1990s. The Terminal is situated within a City-designated Manufacturing Industrial Center (Duwamish Manufacturing Industrial Center). In 2002, with the downturn of the economy, cargo volumes decreased, and a portion of T-30 became vacant, and a two-berth interim cruise facility opened for the 2003 cruise season. With the recovery of the U.S. economy and continued growth of international trade in 2004 and 2005, container-shipping volumes at the Port grew steadily. As a result, the Port redeveloped Terminal 25, Pier 28, and the south portion of Terminal 30 for container use and resumed cargo operations in 2008. The 49-acre site has three cranes, one deep-water berth for cargo vessels, and one berth to the south for barge activity. The primary truck gate located in the City-owned Alaskan Way right-of-way north of Terminal 30 has eight lanes, three of which are reversible. The Port holds a use agreement with Seattle Department of Transportation for this area.

## 2

Just north of the Alaskan Way right-of-way is Pier 34 (Appendix 2). This is a two-acre facility that consists of cargo storage north of the Alaskan Way right-of-way, Jack Perry Park, and two parcels adjacent to the U.S. Coast Guard Base. The two parcels adjacent to the Coast Guard base are under long-term lease to the Coast Guard and the Maritime Institute of Technology and Graduate Studies (MITAGS). Pier 34 also has twelve dolphin piles that are utilized by fuel and container barges.

## 2

Located at north end of Terminal 30 (Appendix 2), including approximately 120 linear feet of shoreline and approximately 1.1 acres upland improvement, Jack Perry Park was developed and expanded to satisfy public access requirements for City Project numbers 8404469, 8701998, and 8805330 relating to expansion of Terminal 30, including use of Alaskan Way South Right-of-Way. Current amenities include fencing, landscaping, and signage. Additional improvements to Jack Perry Park were to be required if the Port vacated Alaskan Way South, as prescribed in the Port of Seattle Comprehensive Public Access Plan for the Duwamish Waterway.

## I

The NEPA document explicitly discusses acquiring land. Please clarify in the Alternatives Analysis why long-term lease options are not feasible.

In this section, we are providing and asking for clarification on proposed alternative extents and potential impacts. Pease refer to Appendix 1 and 2 on extents.

**1 1**

The text describing Alternative 1 contemplates acquiring up to 53 acres of Terminal 46. However, the exhibit is showing approximately 30 acres on Terminal 46. Please clarify the Alternative description or show the additional proposed acreage.

**2 2**

Alternative 2 discusses acquiring up to 13.5 acres of Terminal 30 and three adjacent parcels. This area, along with two of the three adjacent parcels, is called Pier 34 and includes Jack Perry Park. The actual property extent of Terminal 30 begins directly south of the proposed acquisition area. The entrance to Terminal 30 and 25 is within the City-owned Alaskan Way right-of-way, which is the southern extent of the proposed property acquisition.

Alternative 3 describes acquiring up to 21.75 acres of Terminal 46 and two adjacent parcels. It appears the acquisition area also includes parts of Pier 34 (Jack Perry Park and one of the adjacent parcels), but potentially avoids the City-owned Alaskan Way right-of-way.

**I I**

In the environmental review, we ask that the U.S. Coast Guard address the following issues and impacts on elements of the environment.

_____: To the extent the PEIS assumes acquisition rather than long-term lease, the Port asks that the PEIS fully identify and disclose the economic and other impacts of displacing difficult-to-replace maritime industrial functions (and a public access park) from the Seattle waterfront, as listed in Section 2. Below is further detail on specific facilities and operations that should have focused analysis:

- Pier 34 Dolphins: The dolphins are less than 20 years old and are nowhere near the end of their useful life. The *Industrial Moorage Initiative 2008* and *Barge Mooring Study Report 2008* informed the need to build the Pier 34 and Terminal 18 North dolphins. We have additional dolphin moorage planned in our Capital Improvement Plan due to cost/benefit and harbor need. The Port made a conscious decision to utilize the Pier 34 mooring dolphins for various barges that need a place to lay up. This asset is vital to the harbor in serving the fuel barge and container barge industries in Elliott Bay/Puget Sound/Alaska and would need to be relocated.
- MITAGS: The MITAGS building contains high tech training simulators of vessel bridge environments, that provides a near 360 degree physical and digital simulation of a range of potential conditions. Relocating these facilities would be disruptive and costly.

- Jack Perry Park: Jack Perry Parks serves as shoreline public access for Terminal 30. If Jack Perry Park is acquired and developed, comparable public access would need to be created elsewhere.
- Cargo operations: As discussed in Section 2, the modernization of U.S. Coast Guard Base Seattle will result in the loss of area committed to maritime industrial use. These operations cannot be relocated elsewhere on the waterfront. The PEIS should consider the impact of displacing cargo operations, maritime jobs, and related businesses on the local economy.

_____: As discussed under the Purpose and Need section, please provide analysis of effects on the City's regionally- and locally designated MICs and state-regulated shorelines, and potential to protect and improve access conditions for these industrial areas. Evaluate the land use implications considering the essential public facilities designation in the GMA. Particularly evaluate potential for loss of essential industrial zoned area, that is, area built and committed to industrial and marine industrial use. Analysis should include the potential for impacts on industrial lands or businesses to induce acquisitions, displacements, and relocations.

Analysis and evaluation must also include impacts to public shoreline access. If the U.S. Coast Guard redevelops Jack Perry Park, the U.S. Coast Guard would need to identify a location to replace the required shoreline access.

_____: The Port is an economic development authority and NWSA provides critical economic support to the region and the state. The project must not interfere with our ability to accomplish our public sector mission. The Port and NWSA have concerns about possible negative economic effects resulting from unmitigated impacts to businesses which could also affect supporting or related businesses in the maritime, seafood, cruise, or industrial economic sectors. This includes direct job losses through marine cargo and longshore operations, as well as situations where a port terminal is anchoring nearby supplier businesses, such as the Seattle International Gateway railyard of Burlington-Northern Santa Fe (BNSF).

Analysis should include the interdependencies of industrial and maritime businesses and the dependency on water access. This includes the potential displacement of the Pier 34 dolphins and the impact to barge fueling operations.

_____: All alternatives will impact ingress and egress from NWSA container terminals. The EIS should evaluate potential negative impacts to the truck entrance and gate systems and identify solutions.

The proposed modernization of the Base, with its new gate and significantly increased parking capacity, sits at the intersection of two, and along one major, freight corridor of statewide, regional, and local significance. S. Atlantic Street serves as the north end

connection between interstates I-5 and I-90 and the Duwamish Manufacturing Industrial Center. The East Marginal Way/Alaskan Way corridor is a Truck Freight Economic Corridor in Washington State's Freight and Goods Transportation System, carrying more than 10 million tons/year. It serves as a Major Truck Street in Seattle's freight network, the only over-legal north-south route west of I-5 through the City of Seattle, and as a critical element of Seattle's Heavy Haul Corridor. The East Marginal Way corridor also has one of the highest truck trip percentages of any corridor in Seattle.

The study area's roadway network has been transformed by the major projects that replaced the Alaskan Way Viaduct (SR 99) and will continue to evolve in the next few years with construction of the Waterfront Seattle project that is rebuilding Alaskan Way to six to eight lanes north of S King Street and improvements east of Terminal 46 along Railroad Way.

King County Metro buses travel Alaskan Way S between SR 99 and Columbia Street. A transit plaza is planned at Columbia Street. Additionally, Colman Dock ferries, the new Water Taxi terminal, Link Light Rail, and additional bus routes are located approximately 0.3 to 0.5 miles north and northeast of Terminal 46. The EIS should consider potential impacts to waterside navigation at Terminal 46, Pier 46 and along the East Waterway, as well as potential impacts to cargo mobility, and explore options to mitigate potential adverse impacts.

The addition of a significant number of new parking spaces on base will likely generate a significant number of new vehicle trips to the facility. The EIS should carefully evaluate the impact on, and mitigation measures to address these new trips, especially given the surrounding communities' focus on minimizing single occupancy vehicle trips.

The proposed introduction of a new Base entrance on the south-west corner of the Alaskan Way and Atlantic Street intersection appears to introduce what is essentially a new leg for the signalized intersection with bike path. This has the potential to overwhelm the capacity of the existing intersection, signal system, and create a significant safety risk. The EIS will need to take a close look at these impacts and determine the feasibility of the proposed driveway.

Potential increases in Base traffic associated with a significant amount of new parking could affect area traffic, and in particular along the Atlantic Street corridor and the recently constructed South Atlantic Overpass (known locally as "the little h"), East Marginal Way, and Alaskan Way to Dearborn, potentially to the I-5 and I-90 ramps. This could be compounded by the proposed new entry gate at the Terminal 46 entrance at the Alaskan Way and S Atlantic Street intersection. The EIS needs to carefully analyze the potential for increased congestion and determine potential mitigation.

_____: The Portside Trail and the BNSF railroad spur separate Terminal 46 from Alaskan Way South up to South King Street. The Portside Trail is

a separated pedestrian sidewalk and striped bicycle path, with a combined width of approximately 12 feet, parallel to the Terminal 46 perimeter fence. Jack Perry Park is located at the northern edge of Pier 34. Please ensure a complete analysis of potential impacts on these facilities.

_____ The Port maintains many structures that are over 50 years old. Please coordinate with the Port to ensure a complete analysis of potentially eligible structures. In addition, facilities have been constructed in filled former shoreline and shallow-water aquatic areas, used historically for non-port related marine industrial uses and activities, or occupied for other purposes. Construction has the potential to disrupt significant historical and cultural resources and requires detailed analysis and evaluation.

Aquatic areas in the vicinity of Elliott Bay, the East and West Waterways, and the Duwamish Waterway include Treaty-protected "Usual and Accustomed" fishing areas. The Port regularly consults with the Muckleshoot Indian Tribe and the Suquamish Tribe to ensure their members have access to these fishing areas.

Members of the Muckleshoot Indian Tribe and the Suquamish Tribe harvest chinook, Coho, chum, pink, and steelhead salmon in the Elliott Bay/Duwamish traditional fishing areas during summer, fall, and winter of each year, generally from August through February. Treaty fishing access also includes shellfish, shrimp, and crab harvest.

In-water construction and near-water operations in multiple areas has the potential to affect Treaty fishing access, an existing condition the Port and NWSA are committed to maintaining and improving, in partnership with the Muckleshoot Indian Tribe and the Suquamish Tribe.

_____: Please include potential for contaminated soils affecting groundwater conditions where construction impacts are expected. This can be from upland or in-water construction.

Additionally, Terminal 30, Pier 34, and Terminal 46 encompass a mix of Port and City-owned stormwater facilities which are managed by the Port's stormwater utility and the City's stormwater utility, respectively. Alternatives should consider the implications of bisecting existing stormwater basins and how to design the modernized and expanded base to separate stormwater flows. This project may trigger stormwater treatment obligations. Treatment types may need evaluation.

_____: Please translate passenger vehicle and freight transportation changes during construction and operation into effects on air quality and greenhouse gas emissions. Effects to consider may include, but not be limited to, the potential for increased emissions from truck idling due to congestion or at-grade crossings, temporary changes in vessel at-berth operations or while maneuvering, and potential delays in port operations and effects on cargo handling equipment idle times, etc. Please also provide expected impacts on both air

quality and greenhouse gas (GHG) emissions ($CO_2$) associated with the construction process and with the completed modification and expansion of U.S. Coast Guard Base Seattle, noting all measures taken to minimize negative impacts on air quality and GHG emissions. The PEIS should consider a full range of emissions (including buildings, transportation, equipment, and vessels) under each of the alternatives.

_____ Seattle City Light's South Substation is constrained, meaning that increased loads in this area could have implications for surrounding areas in the Southern part of the harbor. In addition, through the Northwest Ports Clean Air Strategy (NWPCAS). The NWSA and Port have adopted goals to reduce and ultimately eliminate seaport-related air pollutant and greenhouse gas emissions by 2050. The NWPCAS is a collaboration between NWSA and the ports of Seattle, Tacoma, and Vancouver, British Columbia to voluntarily reduce seaport-related emissions that contribute to air pollution in the shared Puget Sound-Georgia Basin Airshed as well as climate change.

To achieve its vision, the Port and NWSA are currently developing a Seattle Waterfront Clean Energy Strategy to outline electrical infrastructure needs to allow for zero emissions operations on port facilities. The energy strategy is trying to ensure, given existing constraints and anticipated growth on nearby properties, that Seattle City Light's electrical infrastructure will be able to support the various projects in the vicinity, including potential future uses on Terminals 30 and 46, Washington State Ferries near Coleman dock, and shore power at Pier 66 (which will be provided by submarine cable from Terminal 46).

The PEIS should consider the U.S. Coast Guard's energy utility needs moving forward along with other growing demands on the power utility infrastructure in the area, inclusive of existing planning efforts well underway. This will help ensure that the capacity is not fully tapped and preclude other users from making improvements to support electrification and capacity improvements.

For this potential new use, power requirements, especially those that would go above existing use like new shore power for vessels at berth, should be considered including impacts relative to Seattle City Light's electrical distribution system and impacts to the availability of power for adjacent sites. It is our understanding that the utility's electrical distribution in the vicinity is significantly constrained, especially when projected future uses are considered. The Port and NWSA are currently engaged in a planning process with Seattle City Light and we highly recommend a joint investigation of power requirements, availability, and synchronization with other needs between the U.S. Coast Guard, NWSA, Port, and Seattle City Light.

The Port and NWSA are currently considering the vulnerability of critical infrastructure, including risks associated with climate change, transportation, flooding, and power reliability, among other considerations. As it relates to electrical power, given the identified distribution system constraints coupled with a significant anticipated increase in reliance on

electrical power to serve new load types and quantities as well as an increase in system modernization and complexity, the PEIS should take into consideration resilience with the proposed project alternatives and potential impacts to and shared strategies with neighboring port facilities served by the Seattle City Light system.

_____: The area is comprised of historic landfilling in shallow intertidal aquatic area sediments, with shallow ground-water conditions. The geological condition in this area is very complex and will require detailed evaluation.

_____: Pier 34 was built-up over time using historical filling practices, and beginning in the 1920s, was the location of a bulk petroleum storage facility. The Port performed a soil and groundwater cleanup program and operated the groundwater extraction/monitoring system for about 2 years. Long-term monitoring continued through 2003. Soil or groundwater generated from the site must be properly characterized and disposed of offsite.

Terminal 46 was developed over time using historical filling practices, no sitewide Phase I or II ESAs have been conducted within the Proposed Project Area to date. Soil or groundwater generated from the site must be properly characterized and disposed of offsite.

The East Waterway is a Superfund Cleanup Site and EPA is planning to release its Proposed Plan for cleanup in the near future. Any U.S. Coast Guard project completed within the East Waterway must not preclude any cleanup activities or increase the costs of completing them.

_____: Expanding the Base's landside footprint and adding berth capacity on the waterside on existing NWSA terminals will require expansion of U.S. Coast Guard's security perimeter and the U.S. Security Zone on the waterside. The EIS should evaluate potential impacts on Port/NWSA facilities that would enable the Port/NWSA to maintain full operational functionality (e.g. maintaining the leads for existing tie-offs, preventing the need to short lead), while also considering concurrent impacts to navigation and the Usual and Accustomed fishing area for the Muckleshoot Indian Tribe and Suquamish Tribe. The waterway is already somewhat constrained, and the impacts of additional vessels, security zones, and berthing time should be considered in coordination with all users.

In addition, evaluation of the modernization and expansion of U.S. Coast Guard Base Seattle on the Port/NWSA federally required security zones at Terminal 30, Pier 34, and Terminal 46 facilities is essential. This includes impacts of the expansion on gate access, security perimeters, and vessel operations. We ask that the U.S. COAST GUARD engage the Port/NWSA on this analysis as appropriate if there is any potential for overlap between U.S. Coast Guard and Port/NWSA security zones.

_____ Analysis should include potential effects, including transportation and air quality, on the Duwamish Valley and Chinatown/ International District communities. This should include community bifurcation, changes in circulation patterns to and from public services and amenities, and changes to emergency service response times during construction and due to altered structures and routes following completion.

_____I_____ Construction activities on Port/NWSA facilities have the potential to affect operations, transportation, and access/egress in and around the facilities and surrounding communities. It will be important to understand these impacts and identify appropriate mitigation measures in the EIS.

_____I_____ Please evaluate all elements of the environment for cumulative impacts from direct and indirect development, over time. The Port and NWSA make long-term investments for public purpose and will provide to you our planned capital improvement projects.

The Port and NWSA welcome the opportunity to collaborate with the U.S. Coast Guard and other key agencies and stakeholders to consider development that upholds the importance of the Port's economic development mission and its ability to continue producing family wage jobs that uplift the quality of life in the region. The Port and NWSA will continue to be advocates for the U.S. Coast Guard's long-term presence in the Seattle harbor and the critical role it plays to advance national security, maritime safety, environmental protection, and scientific research.

As a peer public agency with commensurate obligations to the public we all serve, the Port and NWSA look forward to on-going successful work with the U.S. Coast Guard toward a base expansion that complements our regional economic development work, moves the region toward maritime solutions that benefit everyone, and supports the critical nature of U.S. Coast Guard's national security mission.

# APPENDIX 1

# Terminal 46

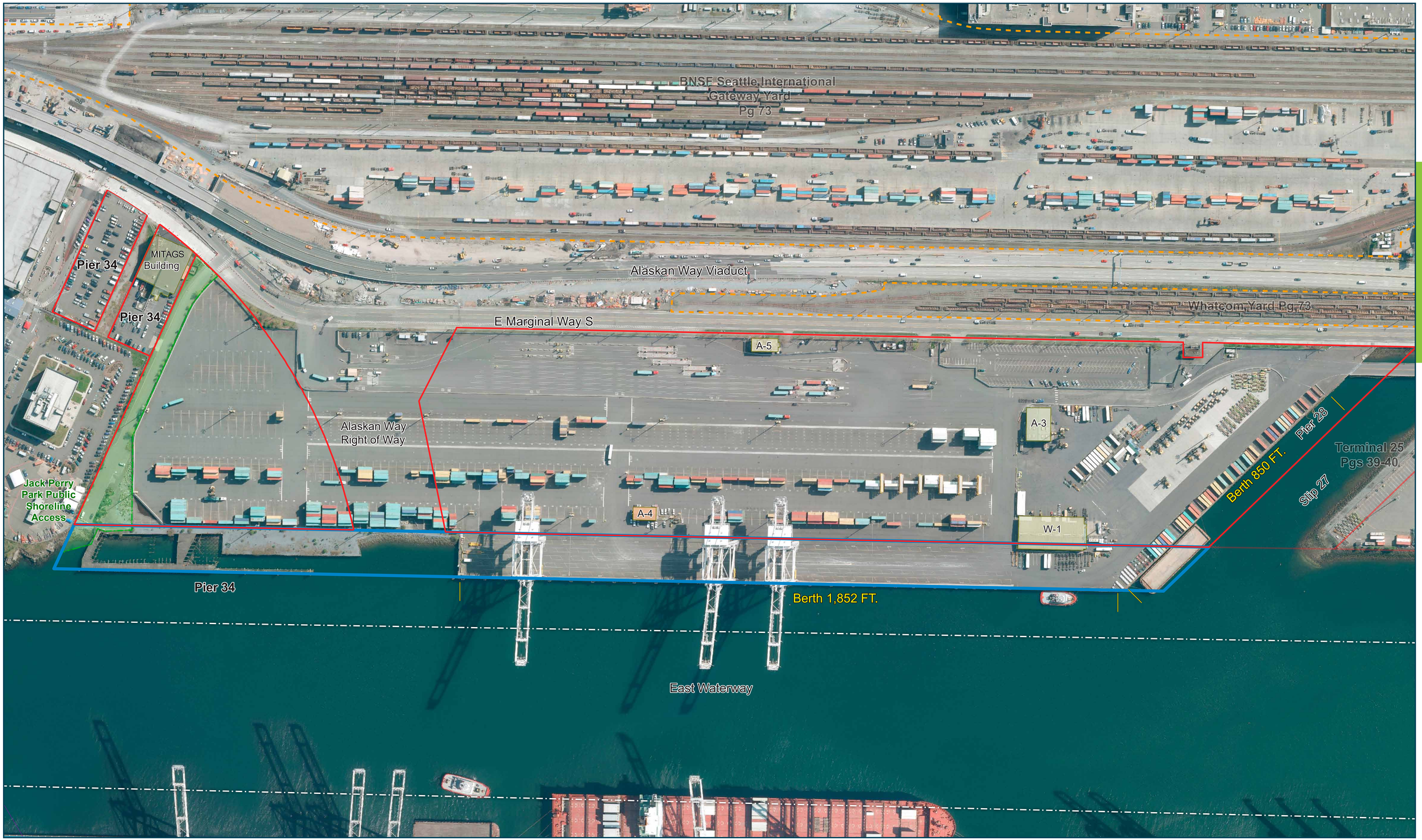
0 125 250 500 Feet

1 inch = 125 feet

Port of Seattle Boundary
Subject to DNR PMA agreement
Federal Channel
Inner Harbor Line
Outer Harbor Line

Aerial Photo Taken Spring 2012

# APPENDIX 2




# Terminal 30 and Pier 34

0 125 250 500 Feet

1 inch = 125 feet

Port of Seattle Boundary
Subject to DNR PMA agreement
Railroad Boundary
Park Border
Federal Channel

Aerial Photo Taken Spring 2012

June 21, 2021

Mr. Dean Admundson
United States Coast Guard Shore Infrastructure Logistics Center
Environmental Management Division

Re: Notice of Intent to Prepare a Programmatic Environmental Impact Statement Request for Comments on Proposed Modernization of Coast Guard Base Seattle

Dear Mr. Admundson,

On behalf of the City of Seattle, the Department of Construction and Inspections (SDCI) is pleased to offer these initial comments regarding scoping of the Programmatic Environmental Impact Statement (PEIS) for the expansion and modernization of the Coast Guard Base at Pier 46 along Seattle's historic waterfront. SDCI looks forward to working with your office and other stakeholders such as affected Tribes, the Port of Seattle (Port) and the Northwest Seaport Alliance (NWSA). We recognize the aligned interests of the U.S. Coast Guard (USCG) and the City in planning for an enhanced polar presence. As a City we support an expanded understanding of our changing climate and support the science this mission will afford.

Regardless of the alternatives selected, this construction and ongoing operation will impact an extremely valuable part of our downtown. As you know, all three PEIS alternatives are within the confluence of a rapidly revitalizing waterfront district, where the State Highway 99 viaduct once stood, a pedestrian connection between the publicly accessible shorelines and Seattle's stadium district of T-Mobile Park, and Lumen Field. Each of these assets represents many decades of public planning and public infrastructure investment. We want to understand how the project could impact these areas and we look forward to building the relationships between stakeholders necessary for this process to work. SDCI supports moving through an effective and transparent NEPA process to project level review and analysis of the selected alternative.

We have provided an attachment that outlines comments solicited from the City departments that are most likely to provide input on future project level reviews. We understand that specific commentary may be more useful at that time but wanted to assure you our staff are apprised of the USCG project and are prepared to assist as your plans develop. Ahead of that project level analysis, we would also direct you to four key areas of interest and concern. Below are questions we would like to see addressed in the overall NEPA process.

*Public access and Shoreline Planning*

As mentioned above, the City of Seattle and State of Washington have invested billions of dollars in planning and infrastructure, designed, in part to revitalize our South Downtown[1]. This waterfront business district and the east/west arterials connecting downtown to both Pioneer Square and the stadiums has been the subject of extensive planning. The Seattle Comprehensive Plan is a key resource for your office to consult in this analysis. How will the USCG integrate those existing planning documents, specifically their focus on walkability, an inviting streetscape, visual and physical access along this waterfront into the USCG's decision making process?

*Future Land Uses and Workforce*

Seattle, although surrounded by water, has a limited supply of maritime industrial lands. Ensuring the continuation of the working waterfront with productive maritime and industrial businesses that support livable, family-wage jobs is a key planning objective to the City of Seattle. How will the PEIS analyze this interconnected issue of maritime industrial land use impacts and the workforce it supports?

*Transportation and Connectivity*

The City is committed to accommodate pedestrians, cyclists, heavy freight, rail and passenger vehicles all within this confluence of arterials and highways that abut each of the proposed alternatives. Our partners in the Seattle Department of Transportation (SDOT) and the Office of Planning and Community Development (OPCD) are eager to consult with you regarding the planning work already completed and to offer insight into the vision for transportation that is still evolving. A key question to resolve will be, what new transportation and utility infrastructure is needed to support the base? Are there opportunities to support and improve mobility for all stakeholders in these key rights of way?

*Sustainability and the Environment*

The City has made a firm commitment to combating climate changes and ensuring a sustainable future through reducing carbon emissions. In preparing this letter, we were pleased to read

[1] http://www.historicsouthdowntown.org/neighborhoods/library-of-planning-documents/

Commandant Schultz's policy statement[2] regarding Sustainability, Environmental and Energy Policy. The City has adopted a parallel stance. We too are a responsive regulatory and environmental enforcement organization. As such, we are committed to investment opportunities that reduce environmental and energy risks and position our region for a sustainable future. We have committed to this goal beyond just policy and incorporated requirements into our code that prohibit most fossil fuel use and require on-site renewable energy generation. Will the USCG be able to mirror this commitment in its development of the base?

Again, thank you for this opportunity to provide scoping comments. We look forward to a productive relationship in this coordinated outreach and review. In the attachment to this letter, you will find more specific comments from other City Departments.

Sincerely,

Nathan Torgelson
Director

Attachment A – Scoping Comments

[2] https://media.defense.gov/2018/Jun/01/2001925991/-1/-1/0/SUSTAINABILITY-30MAY18_SIGNED.PDF

| Topic | Source: City Department | Comment |
|---|---|---|
| Additional sources of information | Office of Community Planning and Development (OPCD) | City's Industrial and Maritime Strategy |
| | | |
| Suggested organizations USCG should be coordinating with | Department of Construction and Inspections (SDCI) | In addition to contacting Federally Recognized Tribes, consult other local experts that may have historic knowledge of precontact resources at the site, especially the Duwamish Tribe, a formerly Federally Recognized Tribe |
| | Office of Sustainability and Environment (OSE) | Duwamish River Clean Up Coalition<br>Seattle Aquarium<br>Catholic Community Services (St. Martin de Porres Shelter)<br>Duwamish Tribe<br>MITGS and labor unions (e.g. MLK Labor Council) |
| Environmental Resource | Source: City Department | Comments on potential impacts to be evaluated |
| Acquisitions, displacements, and relocations | SDOT | All alternatives show seismic renovation of the existing building 7 containing the St. Martin de Porres Shelter. Temporary impacts to the shelter's ability to provide services during renovation should be analyzed and mitigated. |
| | OSE | Analyze impacts to the homeless shelter and tenants including accessibility for clients and staff; including noise and air quality impacts due to construction. While being retrofit, where will shelter clients go?<br><br>How will the land acquisition and construction affect tribal resources? |
| | Office of Economic Development (OED) | How will the unresolved nature of the WOSCA site affect this expansion? |
| Land Use | OPCD | OPCD has been working on an Industrial / Maritime strategy in partnership with Mayor Durkan's Office, OED, SDOT and other departments. In June, a citywide advisory council and four neighborhood advisory councils generated strategy recommendations for the future of Seattle's industrial and maritime sectors. Recommendations will most likely result in updates to Comprehensive Plan text policies and potential future updates to industrial zoning in 2022 plus other executive actions in the areas of workforce, public safety, transportation and environment. Since these actions are pending however, OPCD's comments below do not directly reference them, and are based on existing adopted Comprehensive Plan goals and policies. Nonetheless, we encourage USCG to be aware of the city's Industrial and Maritime Strategy planning efforts, which can be viewed on our website located above under 'Additional sources of information'.<br><br>Land Use and City of Seattle Growth Strategy<br>The site is located within the Duwamish Manufacturing Industrial Center (MIC). Consider and discuss the degree of consistency of the proposed use with relevant policies in the Seattle Comprehensive Plan for MICs and for industrial land use areas. In particular consider and discuss consistency with relevant policies in the Growth Strategy section GS 1.15 – GS 1.21 and the relevant policies in the Land Use section under the Industrial Areas subsection LU 10.1 – 10.28.<br><br>Consider and discuss the extent to which the proposed base activities are marine-related and that the use is a maritime use that is dependent on access to the waters of Puget Sound. |
| Economics | OED | Analyze the workforce implications with expansion. How many jobs will this create? What pipelines are in place for civilian employees? |
| | OPCD | To the extent feasible consider and discuss effects of the proposal on economic opportunity for workforce including overall effects on employment and access to employment by racial groups and educational attainment level. Analysis could include USCG approaches or policies towards racial equity and data on racial composition of the workforce. |
| Social impacts, community facilities, and neighborhoods | OED | Explore the opportunity to have a public viewing site that is not part of the MARSAC facility.<br><br>Use a recruiting tool. People will want to see the ice breakers. How can this be used to engage with the working waterfront, the tourist, the public and youth? |
| | OPCD | Consider and discuss the degree to which the proposal would be consistent with regional and City policies for industry clusters and economic development. Discuss consistency with policies in the City's Comprehensive Plan in the Economic Development chapter under the Industry Clusters section and other sections of the plan noting references to maritime sectors and Seattle's maritime history. Analyze the degree to which the proposal would strengthen or weaken the maritime cluster in the city and region. Include analysis in the No Action alternative of potential long-term effects of the No Action scenario on maritime sectors, including whether No Action could lead to future relocation of USCG functions away from Seattle or the region. |
| | OSE | What public amenities will be created from this project? |
| Visual and aesthetic resources | SDCI | Consistent with the Seattle Shoreline Master Program consider providing a view corridor across the site.<br><br>Consistent with the Seattle Shoreline Master Program consider impacts to the skyline or other visual impacts if structures will exceed the shoreline environment height of 35 feet.<br><br>Alaskan Way S and East Marginal Way S are identified as Scenic Routes. Consistent with Seattle environmental policies (SMC 25.05) maintain some views of water and Olympic mountains from these Scenic Routes. |
| Light and glare | SDCI | Consistent with Seattle environmental policies (SMC 25.05) design to avoid light and glare impacts off-site, especially on open waters (fish impacts) and surface and elevated roadways nearby (driver impacts). |
| Noise | SDCI | Assess short term and long term noise impacts from construction, pile driving, mechanical noise, and noise generated from shore power for maritime vessels while docked. Consider hours of operation and noise impacts on adjacent properties. |
| Ecosystem resources | Seattle Public Utilities (SPU) | Aquatic habitat mitigation and improvement. Address direct, indirect and cumulative adverse impacts on aquatic habitat, and opportunities to improve habitat quality and quantity, particularly for juvenile Chinook salmon. If mitigation is needed, identify where it would occur and types (e.g., habitat beach and bench such as at Pier 48 and priorities in WRIA 9 Duwamish Blueprint – Salmon Habitat in the Duwamish Transition Zone (2014)). |

| Topic | Source: City Department | Comment |
|---|---|---|
| | | Sea Level Rise. Identify the Sea Level Rise planning elevation. The City, King County and Port are meeting regularly to try to create regional agreement on elevations, mapping and guidance. The City currently recommends planning for at least 2.3 feet of sea level rise by 2100. |
| | SDCI | Identify any in-water construction (e.g., use of barges, staging platforms, dredging, temporary piling, material storage, etc.) that may be required for project and potential impacts to water quality and aquatic receptors, particularly threatened or endangered species, due to noise, overwater coverage, release or spilling of toxic substances or debris, turbidity, disturbance of contaminated sediments, fill, etc.. Project should be implemented consistent with applicable standards in the City's Shoreline Master Program for protection of water quality and shoreline habitat.<br><br>Project should be implemented consistent with applicable standards in City's Shoreline Master Program for protection of water quality and shoreline habitat. PEIS should identify and analyze Best Management Practices to address the potential short-term in-water construction impacts, consistent with best available science, mitigation sequencing and the City's Shoreline Master Program, state (Ecology, WDFW) and federal requirements (USACE).<br><br>Identify any potential permanent development in-water at Terminal 46 (e.g., in-water or overwater structures, equipment, piling, piers, dolphins, dredging, fill, shoreline stabilization) and potential impacts to aquatic habitat, aquatic species that utilize this area, and water and sediment quality. Such development should be consistent with applicable standards for this location in the City's Shoreline Master Program. Potential impacts include removal or displacement of aquatic habitat (substrate or water column), shading from overwater coverage and impacts to predation of salmonids, artificial light impacts in the water, noise from operations of facility to sensitive receptors, disturbance of sediments during operation of facility, potential release of toxic substances due to operations, etc.).<br><br>Identify potential short-term impacts of dryland/upland construction methods to aquatic resources and water quality such as excavation, disturbance of contaminated soils or groundwater, transport of material and storage, containment of deleterious or toxic materials, etc. and identify and analyze BMPs to avoid, minimize and mitigate these impacts, consistent with standards in the City's Shoreline Master Program<br><br>PEIS should identify and analyze long-term impacts of the permanent development and operation of facility on aquatic resources and water quality and shoreline environment, consistent with the city's Shoreline Master Program. Potential impacts include release, direct discharge, or accidental spilling of potentially toxic material or liquids to aquatic environment, noise or artificial light impacts, disturbance of sediments, turbidity, shading of water, stormwater or runoff impacts.<br><br>The current and proposed project areas appear to be a mix of land and piers over water. In the Coastal High Hazard flood zones, any buildings located over water would not be allowed without a variance from the Seattle Floodplain Development Regulations Seattle Municipal Code 25.06.110 B1d and the siting requirements of American Society of Civil Engineers (ASCE) Standard 24, section 4.3. |
| Drainage | SPU | Describe drainage impacts and improvements. |
| | OSE | How will vehicle pollution runoff into the Sound be managed/mitigated? |
| Energy/Climate Change | SDCI | Seattle code requires exceptional energy efficiency and prohibits most uses of fossil fuels for operation of new and substantially altered buildings. We also require on-site renewable energy generation. These standards are scheduled to become considerably more stringent over the next decade as this USCG facility is developed. Will the project honor these local environmental standards for construction? |
| | OSE | New construction: meet or exceed the requirements outlined in Executive Order 13693. Build net-zero emissions buildings with limits on fossil fuel use and at least 30% renewable energy sited (solar). Use low-carbon building materials factoring in embodied carbon.<br><br>Vehicle Use/Parking: Provide ample electric charging infrastructure for personnel, visitor and coast guard fleet. Procure zero-emission vehicles in any new fleet.<br><br>Clean energy technologies: Install renewable energy such as solar and battery technology with renewable energy supplying not less than 30% of total building energy. Limit the use of fossil fuel (natural gas and oil).<br><br>Future polar cutter ships: What is the anticipated number and size of new polar cutters? What is the energy/electricity demand for these vessels and how does the City/Seattle City Light need to prepare for potential increase in electricity demand?<br><br>How will construction affect any tree canopy? |
| Geology and soils | SDCI | The USCG Seattle Base project is geologically mapped as Tide flat deposits which include hydraulically placed fill. Based on available subsurface information at and in the vicinity of the project, very loose to loose soil may extend to depths ranging from about 70 to 90 feet. Geologic hazards include excessive settlement, liquefaction, lateral spreading, and potential ground rupture. The project design should mitigate against adverse impacts associated with the geologic hazards as well as mitigate adverse impacts to the stability of adjacent properties and structures which include the Elliott Bay Interceptor (an 8-foot-diameter force sewer main) located east of the project site. |
| Hazardous materials | SDCI | The USCG Seattle Base project is located in the Port of Seattle at the mouth of the Duwamish River. Contaminated fill is common in the Duwamish area. Environmental studies should be performed to evaluate the potential for soil or groundwater contamination at the site and present appropriate measures to properly handle, treat, and dispose of contaminated soil and groundwater. |

| Topic | Source: City Department | Comment |
|---|---|---|
| Utilities | Seattle City Light (SCL) | Topic: Increased Electrical Loads<br><br>The redevelopment of Coast Guard Base Seattle, including the construction of Mission Support and Base Administration buildings, an expanded pier area and cold ironing of additional vessels has the potential to add significant load to Seattle City Light's distribution grid. Electrical service will need to be increased and redesigned in an area that is already experiencing significant growth. Seattle City Light supports the Coast Guard's efforts to modernize operations and looks forward to working together to integrate this new load. Our mission is to build smart, resilient, flexible, dynamic, and reliable grid infrastructure that will support long-term decarbonization and electrification. At this time very little information is available as to the number of ships to be based here and their anticipated electrical loads. An accurate estimate of the load and load shapes over time will be needed for City Light planners as they consider and optimize resulting distribution system upgrades and necessary additions, and we ask that this information be provided in detail as soon as is feasible in future analyses.<br><br>Topic: On-site Utility Upgrades<br><br>All proposed alternatives involve expansion into nearby Terminals 46 and/or Terminal 30, and anticipate modifications to existing base buildings, utilities and infrastructure. Along with Coast Guard electrical equipment, this is an area where Seattle City Light infrastructure provides service to a number of customers, including a potential new Port of Seattle Terminal 46 Cruise Ship Terminal, future service to the Pier 66 cruise terminal, and Pier 52 Colman Dock for the electrification of Washington State Ferries. Seattle City Light and its partners have and are developing significant assets in the area serving multiple customers that must be considered as part of the redevelopment process. Early communication from the Coast Guard is essential for coordination and to avoid relocation of recently installed infrastructure. In addition, any infrastructure needing to be completed by SCL to support this project or the finished product of this project needs to be included as part of the SEPA/NEPA document for this work.<br><br>Topic: Decarbonization<br><br>The redevelopment of the Coast Guard facility is a strategic opportunity to ensure the decarbonization of operations at the site. Given that City Light's carbon neutral power provides immediate air quality and carbon emission reductions when it is used to replace any energy use that emits carbon and other hazardous air pollutants, there are significant benefits to electrifying operations and making new buildings efficient to the greatest possible extent. A significant increase in vehicle parking is described, and we would ask that Coast Guard carefully consider the need for this level of parking and potential alternatives, and provide infrastructure for significant and appropriate electric vehicle charging. City Light suggests that the Coast Guard establish a specific commitment to higher levels of energy efficiency and equipment electrification that meets or exceeds the goals of Seattle's updated Climate Action Plan, of which Seattle City Light as a municipal utility is a key partner. Seattle City Light stands ready to support these efforts with technical support and energy efficiency incentive opportunities. In the longer term, Seattle City Light is working with the Port of Seattle and the NW Seaport Alliance to develop the Seattle Waterfront Clean Energy Strategy, with an integrated planning approach to jointly plan for and deploy clean energy infrastructure to reduce and ultimately eliminate greenhouse gas emissions along our waterfront. We encourage the Coast Guard to engage with the Waterfront Clean Energy Strategy as this plans progress. Contact Andrew at Andrew.gibb@seattle.gov for more details.<br><br>Topic: Equity<br><br>Seattle City Light works to reverse historical inequities and avoid unintended harm to historically underrepresented populations by intentionally prioritizing their needs as we do our work. We note that this is a site that currently houses a homeless shelter, public access locations, is of tribal interest, and includes educational institutions on site. Impacts to these and others should be considered and mitigated or their circumstances upgraded through this project. |
| | SPU | Wastewater.<br>Describe sewer service needed to the City of Seattle system and whether upgraded service connections will be needed and/or City infrastructure will be to be relocated. Please address any permanent or temporary construction-related impacts, including within SPU easements.<br><br>The City has several old sewer easements with the Port of Seattle on T46. For infrastructure that serves Terminal 46, SPU would like to discuss updating these easements to include current weight loading restrictions, access protocols and other elements common to recent Port-City easements on terminals, or transferring these to King County.<br><br>Describe how wastewater is discharged while ships are docked. |
| | | Drinking water.<br>Describe water services needs and whether additional service will be needed from the City. Identify if any City drinking water infrastructure needs to be relocated. Please address any permanent or temporary construction-related impacts. |
| | | Waste management.<br>Cargo and cruise ship operations have different waste management needs, including seasonal peak impacts for cruise ships.<br><br>Describe how waste will be managed (e.g., solid waste, recycling, hazardous materials), including being off-loaded from ships, stored, moved between locations and accessed for removal to recycling, compost or disposal.<br><br>Describe waste minimization and reduction efforts. |
| Transportation | Seattle Department of Transportation (SDOT) | Extent of staff expansion is unclear and will affect level of impact to transportation environment and associated mitigation. That being said, Map A for SMC 23.52.004 requires a target SOV mode share of 51% for the project area. USCG should as a part of the PEIS evaluate current and potential SOV mode share and consider mitigation efforts, including but not limited to reducing on-site parking, providing staff Orca permits, charging per use of on-site parking, or others to meet this mode share requirement.<br>Effect of current Transportation Management Programs for USCG employees at the project site on SOV mode share should be studied and improvements proposed. |

| Topic | Source: City Department | Comment |
|---|---|---|
| | | All alternatives appear to show reconfiguration of the S Massachusetts St ROW for exclusive use of the USCG as an "Anti-Terrorism/Force Protection (AT/FP)-compliant main entry control point (ECP)". Impacts to public access as a result of this use should be studied, including but not limited to: loss of public parking; loss of pedestrian access to public ROW. Design of access management plan and gate control, including potential for access queueing to spill back onto Alaskan Way and affect downstream LOS, should also be studied. Any structures in the S Massachusetts St typically would require a long-term SDOT permit and/or other agreement.<br>A two-way bike crossing is planned for implementation at the intersection of S Massachusetts St and Alaskan Way S. AM- and PM-peak hour commute periods for USCG staff should be studied to identify potential impacts to users of this bicycle facility. In addition, the highest design vehicle anticipated to use this access point should be identified and coordinated with SDOT before implementation of the bicycle crossing. This coordination will allow SDOT to design the bicycle crossing to better accommodate the USCG's access needs and avoid unnecessary reconfiguration of the crossing by USCG.<br>All alternatives appear to show an AT/FP-compliant ECP at the intersection of S Atlantic St and Alaskan Way S. This access point could conflict with vulnerable users of the existing Elliot Bay Trail and on Alaskan Way S. There is also no space identified for vehicle queuing at this access point. If any vehicle access is proposed at this ECP, impacts to pedestrian queuing space, the safety of cyclist and pedestrian users, and intersection LOS should be studied.<br>Any construction closures on Alaskan Way S, if necessary, may interfere with regional freight mobility, ped/bike mobility, or other and may require detours or other mitigation.<br>Alternatives 2 and 3 appear to impact public access to the Jack Perry park on Terminal 30. Impacts to access should be evaluated with the owning agency of the park.<br>Elevation of existing or proposed structures should be evaluated against climate change maps for anticipated future sea levels at the site. Potential impacts to public access and ROW drainage due to change in elevation of existing structures or surfaces should be included in this analysis.<br>Alternative 2 shows a expansion of surface parking to include use of the Holgate St ROW on Terminal 30 - this land is City of Seattle ROW used under permit for Port of Seattle access. The reconfiguration of this ROW envisioned in Alternative 2 would likewise require a City of Seattle permit. Any impacts of this reconfiguration to existing port access, as well as new impacts to ROW that might arise from relocating this existing port access to a new location, should be studied.<br>Street landscaping and tree planting are recommended as potential mitigation options for aesthetic, surface runoff, and carbon emission impacts. Tree plantings may also serve as traffic calming mitigation if coordinated with SDOT Urban Forestry. A potential off-site space for mitigation of trees and landscaping removed may be possible on the east side of East Marginal Way within SDOT ROW. |
| | OPCD | Consider and analyze the potential for multi-modal access for employees at the proposed use. Analyze availability of existing and planned transit access near the proposed use including future expansion of the light rail transit by Sound Transit. Consider needs or barriers to last mile connection to the proposed use from transit. |
| | OSE | What are the impacts to BNSF rail? |
| Parkland and open space | OSE | Since Jack Perry park appears to go away, what public park land will be available? |

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
*Northwest Regional Office • PO Box 330316 • Shoreline, Washington 98133-9716 • (206) 594-0000*
*711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

June 21, 2021

US Coast Guard
Shore Infrastructure Logistics Center - EMD
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

**Re: Base Seattle Programmatic Environmental Impact Statement (PEIS)**
**Docket# USCG-2021-0183, Ecology Reference# 202102388**

Dear Dean Amundson:

Thank you for the opportunity to provide comments on the National Environmental Policy Act (NEPA) PEIS scoping notice for the United States Coast Guard Base Seattle expansion and modernization project. Based on review of the checklist associated with this project, the Department of Ecology (Ecology) has the following comments:

## ENVIRONMENTAL JUSTICE

All members of the community in and surrounding the project area need to be included in the scoping process. The scoping of this project should give consideration to how this project will impact marginalized communities and consider how those impacts can be mitigated to ensure there is no unfair distribution of harm to these communities.

Throughout the review of this project, the Coast Guard should ensure that all those in the community are involved in a meaningful way and have access to participate in the decision-making process.

## AIR QUALITY

We would expect some greenhouse gas (GHG) emissions to occur during the construction phase due to fuel combustion in on-road and off-road mobile sources and heavy equipment. While we would not expect these construction GHG emissions to be significant, we recommend that they be disclosed.

We also expect the operation of the expanded and modernized facilities to impact GHG emissions, with expansion increasing GHG emissions and modernization likely increasing efficiency and reducing relative GHG emissions. We recommend that operational GHG emissions be included in the evaluation for the potential for increased emissions.

## SHORELANDS

### Coastal Zone Management Program (CZMP)

Pursuant to federal regulations – Federal Consistency with Approved Coastal Management Programs (15 CFR Part 930) – federal agencies must evaluate all federal activities, such as development projects, to determine whether the activities have reasonably foreseeable effects (the effects test) to Washington's coastal uses and/or resources. If the Coast Guard determines that there are such effects, then it must prepare a complete federal consistency determination and submit it to Ecology no less than 90 days prior to the Coast Guard's "final action" on the project. Ecology has 60-75 days to issue a decision.

The effects test applies to all areas of Washington's coastal zone. Regardless of the project's location (i.e. all on federal land), if the project will affect coastal zone resources or uses, then the Coast Guard must submit a consistency determination. For example, if the project will affect eelgrass beds on Coast Guard property, those effects may result in impacts to species such as salmonids, which use the eelgrass for habitat and foraging.

The Coast Guard's consistency determination must include a full discussion of all of the applicable enforceable policies of Washington's CZMP. Those include policies in the Shoreline Management Act, the Washington Clean Air Act, and the Water Pollution Control Act and those Acts' implementing regulations. Two enforceable policies may not apply – the Ocean Resources Management Act and the Marine Spatial Plan – as those apply in Pacific Coastal areas.

For further information on enforceable policies, please see https://fortress.wa.gov/ecy/publications/SummaryPages/2006013.html or contact Washington's CZM Program at ecyrefedpermits@ecy.wa.gov

### 401 Water Quality Certification

Depending on the scope of the project and whether there is a discharge to waters of the state, a Section 401 Water Quality Certification may be required for the proposed activity. More information can be found on Ecology's web site at: 401 Water quality certification - Washington State Department of Ecology.

## OIL SPILL PREVENTION, PREPARDNESS, AND RESPONSE

### Southern Resident Killer Whales

Southern Resident Killer Whales (SRKWs) along with other threatened and endangered species may be present within the project area and within the shipping routes that vessels calling to the base will utilize. Areas for consideration include:

- Impact of changes in vessel traffic along shipping routes to and from the base. Potential impacts include underwater noise pollution, vessel strikes, and a major spill incident.

- Measures to mitigate vessel traffic impacts to SRKWs.
- Impact of construction activities and measures to mitigate these impacts to SRKWs.

**Vessel Traffic**
The PEIS should include a transportation study regarding the impact of changes in vessel traffic. While the proposed expansion does mention the addition of three Polar Security Cutters and four additional major cutters, the study should include all projected changes in vessel traffic and capacity under the proposed action and three alternatives.

**Tribal Resources**
An assessment of how this project will impact tribal resources in the project area during construction and operation should be considered. Potential areas to consider include:

- How will changes in vessel traffic impact tribal fishing areas in terms of safety, access, and spill risk?
- How will changes in vessel traffic impact availability of tribal fishing areas during fishing seasons with high trafficked navigation channels?

Ensure Federally Recognized Tribes in the project area are consulted during the PEIS scoping, drafting, and project approval process. This should be a collaborative and inclusive process.

**Risk of Oil Spills**
The PEIS scope should include an analysis regarding the risk of potential oil spills and what prevention, preparedness, and response measures will need to be in place to mitigate this risk. Areas of risk for oil spills include:

- Vessel transportation, including changes in oil spill risks due to changes in vessel traffic under the proposed action and alternatives.
- Operation and construction standards.
- Equipment design and maintenance.
- Continual staff training and overlap in training during staff turnover.

**Sea Level Rise**
The PEIS scope should consider how sea level rise could impact the base and how the base will safeguard against sea level rise.

**Project Scope**
In order to assess the full scope of impact that this project approval will have, the PEIS needs to expand the scope of the project area to include shipping routes for vessels calling to the base during construction and operation.

**TOXICS CLEANUP**

The Toxics Cleanup Program expects the PEIS to include a discussion of areas of contamination and how they might impact the project area for all identified state cleanup sites on the existing Coast Guard property and on the adjacent properties where land acquisition might occur. From our records, this includes:

- Coast Guard Base
  - US Coast Guard Pier 35 (cleanup site ID (CSID) 10181): Confirmed petroleum contamination in soil.
  - US Coast Guard Support Fac Pier 36 (CSID 10182): Soil contamination with petroleum. Received a No Further Action at the Initial Investigation stage in 2013.
- Terminal 30
  - Port of Seattle Terminal 30 (CSID 4394): Confirmed contamination with petroleum and related compounds in soil, groundwater, surface water, and sediment.
  - Port of Seattle Terminal 30 Gas & Diesel USTs (CSID 9657): Soil and groundwater contamination with petroleum. Received a No Further Action at the Initial Investigation stage in 2012.
  - Port of Seattle Terminal 30 Heating Oil Tank (CSID 9658): Soil contaminated with petroleum. Received a No Further Action at the Initial Investigation stage in 2012.
- Terminal 46
  - Port of Seattle Terminal 46 (CSID 7005): Confirmed petroleum contamination in soil and suspected contamination in sediment.

We would also encourage an evaluation of cleanup sites identified on nearby properties, to determine if contamination from these sites has not migrated into the project area. Based on proximity, evaluated sites might include the following, and may also include other sites not listed here:

- Emerald City Disposal Massachusetts (CSID 6717): Confirmed contamination in soil and surface water.
- Federal Warehouse (CSID 6842): Confirmed contamination of soil and groundwater with petroleum and related chemicals.
- WA DOT South Atlantic St (CSID 12505): Confirmed polycyclic aromatic hydrocarbon (PAH) contamination in soil.
- GATX Tank Storage Terminal (CSID 2543): Petroleum and metals contamination in soil, groundwater, and possibly sediment.
- SR 519 Street Improvement (CSID 4141): Soil and possible groundwater contamination with petroleum, PAHs, and metals.

Electronically available documents for each of these sites can be accessed through the cleanup site webpage, which can be found by searching the site name or CSID at

https://apps.ecology.wa.gov/gsp/SiteSearchPage.aspx. Ecology's *What's in My Neighborhood?* application provides an interactive map showing these and other nearby contaminated sites and can be accessed at https://apps.ecology.wa.gov/neighborhood/. To review documents not available electronically, please put in a public records request using the instructions or online submission form available at https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests.

The PEIS should include a discussion of how soil, groundwater, sediment, and/or soil gas at the project location will be characterized and remediated if necessary to ensure protection of workers and mitigation of Model Toxics Control Act (MTCA) liability. Depending on the overlap of the project alternative areas with existing contamination, we expect the discussion may include plans for one or more of the following:

- Specific health and safety requirements for workers who may encounter contaminated media during construction or operations.
- Removal and proper disposal of contaminated soil, groundwater, and sediment from the project area.
- Construction of a cut-off wall to prevent contaminated groundwater from flowing into the project area.
- Vapor intrusion controls for the new buildings, such as a vapor barrier or sub-slab depressurization system.

Thank you for considering these comments from Ecology. If you have questions or would like to respond to these comments, please contact Meg Bommarito, Regional Planner, at (206) 594-0010, or by email at meg.bommarito@ecy.wa.gov.

Sincerely,

Tom Buroker
Northwest Regional Director

Submitted via Federal docket website

ecc: Emily Bruns, Ecology
Meg Bommarito, Ecology
Joel Creswell, Ecology
Brittany Flittner, Ecology
Rebekah Padgett, Ecology
Katelynn Piazza, Ecology
Kim Smith, Ecology
Terry Swanson, Ecology

# MUCKLESHOOT INDIAN TRIBE
## Fisheries Division

39015 - 172nd Avenue SE • Auburn, Washington 98092-9763
Phone: (253) 939-3311 • Fax: (253) 931-0752


21 June 2021

United States Coast Guard
Shore Infrastructure Logistics Center
Environmental Management Division
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203
Attn: Mr. Dean Amundson

Re: Notice of Intent to prepare a Programmatic Environmental Impact Statement
Request for Comments on Proposed Modernization of Coast Guard Base Seattle

Dear Mr. Amundson,

The Muckleshoot Indian Tribe is a successor in interest to tribes and bands that were parties to the Treaty of Point Elliott, 12 Stat 927, and the Treaty of Medicine Creek, 10 Stat 1132. Through these treaties, the Tribe has reserved Treaty fishing, hunting, and gathering rights, including the right to take fish at its usual and accustomed fishing grounds and stations. *United States v. Washington*, 384 F. Supp. 312 (W.D. Wash. 1974); *Muckleshoot Indian Tribe v. Hall*, 698 F. Supp. 1504 (W.D. Wash. 1988). These usual and accustomed grounds and stations include, but are not limited to, Elliott Bay, the Duwamish Waterway, the East Waterway and West Waterway. These fishing rights and resources are integral to the Tribe's history and cultural identity and the sustainability of both are therefore essential to the Tribe. Coast Guard Base Seattle is located within the Tribe's usual and accustomed fishing grounds and stations.

The Notice of Intent (NOI) to prepare a Programmatic Environmental Impact Statement regarding the Coast Guard's proposed action to expand and modernize Coast Guard Base Seattle in Seattle, Washington, presents alternatives that potentially impact Muckleshoot Indian Tribe fishing. As referenced in the NOI, it is extremely important that the Coast Guard consults directly with the Tribe, and works directly with the Tribe to avoid or minimize these potential impacts. Both of the areas discussed in the Action Alternatives (Terminal 30 and Terminal 46) have been historically and actively used by Tribal fishers. The Tribe has worked cooperatively for many years with the Port of Seattle and Northwest Seaport Alliance to facilitate Treaty fishing opportunities at these locations.

The NOI states that part of the need for the proposed expansion includes homeporting three new Polar Security Cutters, in addition to one existing icebreaker (CGC HEALY) and "up to four other major cutters." All totaled, up to eight major vessels would be homeported at the expanded Coast Guard Base Seattle. As currently described in the NOI, it is unclear where these new vessels will be moored in each

of the proposed Action Alternatives. The Coast Guard should specifically identify proposed moorage locations associated with each of the three Action Alternatives, including information regarding the size of each moorage location, seasonal use of the moorage locations, and any security zones or other regulations that would impact the ability of Tribal fishers to continue to utilize these Terminals for Treaty fishing.

Thank you for the opportunity to comment on this project. We look forward to working directly with the Coast Guard to address these important issues. Please do not hesitate to call me at (253) 876-3130 with any additional questions.

Sincerely,

Glen R. St. Amant
Fisheries Habitat Protection Assistant Director

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PUBLIC SUBMISSION

# Comment Submitted by Blair Bouma

Posted by the **Coast Guard** on Jun 21, 2021

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Comment ID
USCG-2021-0183-0025

Tracking Number
kq7-fz7m-slxc

Comment Details | Submitter Info

Received Date
Jun 20, 2021

Comment

Department of Homeland Security
Coast Guard
Docket Number USCG-2021-0183

To Whom it may concern,
I am a member of the Puget Sound Pilots Association and one of the training pilots responsible for training pilots in our district.
I am very happy to hear that the department of Homeland Security intends to update and expand the Coast Guard base in Seattle and fully support the mission of the Coast Guard as well as the improvement of the Seattle base.
In reviewing the proposed plans, I would like to express concern for the displacement of the Maritime Institute of Technology and Graduate Studies "MITAGS" (formerly known as the Pacific Maritime Institute) required by options 2 and 3 in the notice. MITAGS is the most prominent maritime training school in the Pacific Northwest and serves a critical role in providing required regulatory as well as on-going professional training for mariners in the Northwest region and beyond. I have attended training at the MITAGS facility throughout my career. As a training pilot for Puget Sound Pilots, I can assure you that MITAGS provides an unparalleled simulator facility in the region with three high-tech ship's bridge simulators as well as other resources that are critical to the Puget Sound Pilot's mission to protect the citizens, environment, and economy of the Pacific Northwest. The MITAGS facility is used by the Puget Sound Pilots for everything from license exam evaluations to tanker escort training, large container ship training and other critical training supporting the front-line role of the pilots in maintaining safe pilotage in the region.
Once again, I am pleased to see and fully support the plans to expand and improve the Seattle Coast Guard base. With that said, I strongly request that the MITAGS facility at 1729 Alaskan Way South be left in its present location. If it is deemed necessary to take over the MITAGS property, I would hope that the DHS and Coast Guard would recognize the critical nature of the MITAGS facility and operation and step-up with generous support to relocate and reestablish the MITAGS operations.
Thank you for considering this input. I am happy to discuss these issues if it would be helpful.

Sincerely,
Capt. Blair Bouma
Puget Sound Pilots
(425)239-7838

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U.S. Coast Guard
Shore Infrastructure Logistics Center - EMD
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

Re: Scoping Comments for the Base Seattle PEIS (USCG-2021-0183).

Dear Mr. Amundson

350 Seattle appreciates the opportunity to submit comments in response to the Coast Guard's request for feedback on its proposal to expand Base Seattle.

We provide the following comments and questions with the hope that when the draft Programmatic Environmental Impact Statement ("PEIS") is published, we can engage in informative and meaningful analysis.

**I**

The Summary of Expected Impacts identifies that the Proposed Action will be primarily located "around Base Seattle." However, we are increasingly concerned by a further off goal that this project seems to be promoting, increased human presence in the arctic.

We request that analysis of how this project will contribute to impacts in the increasingly threatened arctic be included in this PEIS. It is clear from what has already been shared with the public that this project aims to support and extend the Coast Guard's presence in the arctic. It should therefore be analyzed and shared what the direct, indirect, and cumulative impacts of this bolstered presence could be.

-How will this increase militarization in the arctic? How will increased arctic operations contribute to melting glaciers via black carbon? Will the operations originating from the Project be used in any way related to fossil fuel or mining exploration or extraction?

The following are a list of questions that we believe should be addressed in the upcoming PEIS, in no particular order.

- How does the Coast Guard plan to address the pier's potential for liquefaction in the design of their facility?
- What will be the timing of construction? Will construction be planned to avoid increased pollution during times of animal/sea life migration? How will construction and the commuting of workers affect local traffic times and pollution levels? Construction impacts will include development of the site and moving material to the site. What is the planned method for delivering construction equipment? Does that change with a particular action alternative? Which communities will be impacted?
- How will the facility receive fuel in its planned location?
- How will construction and fuel delivery increase harmful pollutants for neighborhoods already experiencing worse than average air quality on the health disparities map?

It seems guaranteed from the Project's stated purpose that there will be additional ships traveling from the port of Seattle to far off arctic ecosystems. The following are a list of questions we think should be addressed in the PEIS and concerns we have regarding this topic, in no particular order.

- Will the environmental impacts from ships traveling to and from Seattle Base be analyzed along the corridor they use out of Puget Sound/Salish Sea? (e.g., there should be analysis of light and sound pollution impacts on both the local ecosystems ships will pass and on local communities).
- What will be the plan for vessels bound for Seattle Base if shipping traffic prevents them from reaching their destination? Will there be backup locations for ships to wait?
- What regulations will ships follow to prevent the transmission of invasive species?
- Will increased ship traffic impact local commercial/tribal fishing?
- Will ships be cleaned before entering Puget Sound?

**I**

-Any potential environmental impacts to the marine ecosystems of the Puget Sound/Salish Sea needs to be analyzed in incredible detail. The following are a list of questions and concerns we believe the PEIS will need to address to meet this threshold.

- Will there be any Sonar use at the facility, and how would the coast guard plan on responding should there be a mass stranding of citations correlated with use of active sonar?
- What will be the sources of acoustic pollution? How frequently and intensely will these impacts occur?
- Will there be any runoff from ships or the facility as a result from construction or during routine activities?
- What will be the energy source for the ships and buildings? What will be the emissions resulting from this energy (accounting for the full life cycle of fuels like liquefied natural gas using best available science)?
- What will be the sources of light pollution from this site, and how will they impact marine life, wildlife, birds, humans?
- How will this facility and its operations affect any endangered or critical species?

We urge that anything related to this Project that falls under the purview of tribal consultation or involvement include the Duwamish Tribe, who have cared for the lands and waters where the Project is located since time immemorial, in addition to federally recognized tribes.

It is stated that the "Proposed Action is programmatic in nature and specific projects are anticipated to occur over the next decade." However, the proposed alternatives seem to outline specific property acquisitions, specific constriction propositions, and even equipment upgrades. This begs the question, what specific projects will take place over the next decade.

NEPA requires that agencies take a proper "hard look" at the projects they are planning. This process involves analyzing and conveying to the public sufficient details about their planned activities so that the full scope of environmental impacts may be understood. In order to fulfill

this obligation, does the Coast Guard plan on issuing supplemental environmental analyses to support this Programmatic Environmental Impact Statement?

If additional, in depth environmental analyses are not planned, then this PEIS should instead take the form of a detailed EIS, which will clearly detail the environmental impacts from all reasonably foreseeable activities. To this effect, we believe the following questions should be addressed regarding the scope of activities to take place on the proposed facility, in no particular order.

- Will this facility be used to support any weapons testing, warfare training activities, naval training, or active sonar testing? What would be the impacts to human health, levels of noise pollution, impacts to marine life that use sonar? Impacts to birds?
- Will this facility be used to house any vessels other than those outlined in the request for scoping comments?
- Will there be maintenance of the vessels docked at this facility (e.g., cleaning the ships) and what will be the potential environmental impacts from that?
- Will there be any toxic/hazardous/volatile compounds or items stored at this facility, including fuels? What are the health impacts? What are the potential safety concerns for surrounding communities in the event of a catastrophic incident like explosion or liquefaction caused by earthquake? What would be the water quality and marine life impacts in a liquefaction event?
- Will vessels docked at this facility be using power while docked (e.g., to run fridges or other appliances)? How much on average? What are the climate and health impacts of the power based on lifecycle emissions using best available science?
- How many additional personnel will the expanded facility support? What impacts will this have on local traffic times and air pollution? What impacts will there be to salmon from the toxins in tires that reach waterways?
- Will buildings be built using environmentally conscious designs?
- How could this Project's use of Terminal 46 impact longshore worker job security? How would committing to this Project impact the Port's ability to use Terminal 46 for green job opportunities or community spaces?
- Will the Project be in alignment with city, county and state comprehensive plans, climate goals and equity goals?

Again, we appreciate the opportunity to submit comments regarding this project. The Seattle waterfront is an important historical structure, and serves as a gateway for humans to extend their impacts into the ecosystems of Puget Sound. We hope the Coast Guard is able to develop a thorough environmental analysis recognizing the need for caution with any and all development in this delicate location.

Sincerely,

Stacy Oaks
350 Seattle
Stacy@350seattle.org

| | |
|---|---|
| **From:** | Santos, Rep. Sharon Tomiko |
| **To:** | Amundson, Dean J CIV |
| **Subject:** | [Non-DoD Source] Scoping comments |
| **Date:** | Monday, June 21, 2021 11:59:17 PM |
| **Attachments:** | image003.png<br>image004.png<br>image005.png<br>image006.png |
| **Importance:** | High |

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June 21, 2021

Submitted via the Scoping Portal

U.S. Coast Guard
Shore Infrastructure Logistics Center
Environmental Management Division
Attn: Mr. Dean Amundson
1301 Clay Street, Suite 700 N
Oakland, CA 94612-5203

RE: Notice of Intent to Prepare a Programmatic Environmental Impact Statement – Request for Scoping Comments on Proposed Modernization of Coast Guard Base Seattle (Docket #USCG – 2021-0183)

Dear Mr. Amundson:

Thank you for the opportunity to respond to your invitation to provide comments for your consideration about the scope of the Programmatic Environmental Impact Statement (PEIS) review you plan to conduct on the proposed expansion and modernization of Coast Guard Base Seattle in Seattle, Washington. I am submitting the comments contained herein as a Washington State Representative for Legislative District 37 which includes territory and communities which will be affected by the proposed project. I therefore request to be made a party of record and to receive future notices related to this proposal.

I have arranged my comments to address the character of the affected areas which I represent, followed by specific concerns related to: Construction; Traffic and Parking; Economic integration; and, Operations.

Community Character

The area under consideration is part of an historic working waterfront for Seattle since the establishment of the settlement known as New York Alki. To this day, trade and transportation have long defined the business of the Port of Seattle, with trucks, trains, and cargo ships hauling U.S. exports throughout the Asia Pacific region and beyond. In addition, a new industry catering to leisure activities of professional sports took root in the more recently coined Stadium District which abuts the waterfront. These regional and international economic activities contribute to significant congestion in, around, and through the area.

The residents of the nearby Pioneer Square and the Chinatown-International District neighborhoods have borne the brunt of construction and operational impacts created by external development pressures and political disinvestment for more than five decades, with the pace of "Progress" increasing in the last two decades. These neighborhoods are characterized by their historic buildings and historic designations, which are largely built with unreinforced masonry, and by micro-economies that serve niche clientele (e.g., immigrant communities). The population of the combined neighborhoods, according to the City of Seattle Department of Neighborhoods, is 5,289 of which 33.2% are White and 66.8% are non-White. Ninety-four percent of the residents are renters and the median household income is $26,559. In addition, a high proportion of these residents are elderly. All of these factors combine to depict a vulnerable community at risk of displacement and harm.

Construction

All of the proposals to expand and modernize the Coast Guard Base Seattle at Port of Seattle Terminals 46 and 30 will follow on the heels of multiple long-term public construction projects including: the removal of the Alaskan Way Viaduct (Highway 99), the reinforcement of the Elliott Bay seawall; the development of the Waterfront Project and Promenade; the expansion of the Washington State Ferry Terminal, and the on-and-off again City of Seattle Streetcar. The culmination of traffic in and through the adjacent streets, including the co-mingling of passenger and commuter vehicles with commercial trucks, has created hazardous vehicular and pedestrian conditions. The PEIS should specifically examine how construction will impact ongoing construction projects and existing access to the Seattle waterfront. The PEIS should also examine how construction staging will reduce the through-flow of traffic on the waterfront and through the residential neighborhoods. Finally, the PEIS should measure the cumulative impact of construction noise and activity on the nearby residents.

Ongoing Traffic

One significant outcome of the removal of the Alaskan Way Viaduct (Highway 99) is the reduction in the vehicular capacity of the roadway, thereby re-routing traffic to surface streets and adding to traffic congestion. Alternative 1 identifies that 13 acres of new parking will be added to the expanded base. The PEIS should specifically examine how the addition of the maximum capacity of this parking lot will affect traffic, overall and at specific times of day. In addition, the PEIS should identify opportunities to mitigate U.S. Coast Guard personnel traffic with off-site parking options with employee shuttles, much as Microsoft and Amazon provide to their employees.

Economic Integration

The addition of a new 5-story 75,000 s.f. Base Administration Building and a new 3-story 36,000 s.f. Mission Support Building will compound an existing problem experienced by the immediately adjacent neighborhoods with transient individuals that are not incentivized to economically support the local micro-economies. The PEIS should measure the economic contribution of the expanded facilities and the extent to which this economic activity benefits or depresses the adjacent neighborhoods.

Operations

The expansion of the U.S. Coast Base suggests a more robust level of operational activity. The PEIS should examine how expanded operations may exacerbate concerns about traffic as noted above as well as potential concerns about hours of operation, especially with respect to the timing of highly popular sporting activities. During some home games of the Seattle Seahawks, upwards of 60,000 fans will descend on the Stadium District with spillover traffic – vehicular and pedestrian – to the surrounding neighborhoods.

Again, I appreciate this opportunity to offer brief comments about the scope of the PEIS review of the proposed expansion and modernization of the U.S. Coast Guard Base Seattle. I look forward to learning more in the weeks and months to come.

Sincerely,

State Representative
37th Legislative District, Position 1
Chair, Education Committee
Washington State House of Representatives
Remote Office: (360) 464-2436
SharonTomiko.Santos@leg.wa.gov
Amber Ceballos
Amber.Ceballos@leg.wa.gov

***NOTICE OF PUBLIC DISCLOSURE:*** *Please note, this email and any documents you send this office may be subject to disclosure requirements under the state Public Records Act, RCW 42.56.*

# Appendix E:
# Environmental Conservation Measures

## Coast Guard Base Seattle Modernization, Seattle, Washington
## Environmental Conservation Measures

An Environmental Conservation Measure (ECM) is a method or standard practice that has been shown to effectively reduce or avoid adverse environmental impacts. The ECMs are incorporated into the Proposed Action and Action Alternatives with no need for separate or additional impact analysis. These measures are not required mitigation to reduce significant impacts to less the significant level. The table presented in Appendix E is a list of Environmental Conservation Measures (ECM) associated with actions within the PEIS to avoid or minimize potential environmental impacts.

ECMs are organized in accordance with the phases of the construction project development, including pre-construction contract award, planning, design, construction and post construction. Pre-award activities would include the actions considered and executed to initiate the expansion and modernization of Base Seattle program. The planning phase includes studies and documentation required to support the subsequent design and construction phases of the program. The design phase includes the preparation of plans and specifications for each of the individual proposed construction projects within the program. The construction phase is the actual onsite demolition, renovation, and new construction activities for the proposed projects. Post-construction actions are construction close out procedures and ongoing operations at Base Seattle related directly to the Proposed Action.

### Table E-1 Environmental Conservation Measures

*Table Key: ECM= Environmental Conservation Measure required to be implemented as part of the Proposed Action; PA= Pre-Construction Contract Award; P= Planning Phase; D= Design Phase; C= Construction Phase; PC= Post-Construction; N/A= Not Applicable*

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Pre-Construction Contract Award (PA) Phase Activities** | | | |
| PA1 | N/A | The conditions within this Programmatic Environmental Impact Statement (PEIS) are incorporated into contracts. Contractor shall be required to implement and strictly comply with the measures. | ▪ Coast Guard Facilities Design and Construction Center (FDCC) to relay requirements to the Contracting Officer<br>▪ Contracting Officer to incorporate requirements |
| PA2 | N/A | Ensure funds are available and programmed to fund implementation of ECM commitments. If funding is not available, the action may not go forward until:<br>▪ Funding is provided and the measures are implemented.<br>▪ The project can be modified or design to avoid the anticipated impact, or<br>▪ Subsequent environmental review is prepared to document that a significant impact will occur due to a lack of funding for mitigation. | ▪ FDCC to ensure funding is available |
| **Planning (P) Phase Activities** | | | |
| P1 | Geological Resources | Contractor shall conduct standard soil and geotechnical surveys and investigations to ensure site stability, as necessary and appropriate. | ▪ FDCC to ensure inclusion in the Statement of Work (SOW)/plans and specifications<br>▪ Design Contractor to confirm Architectural / Engineering Report<br>▪ Coast Guard Representative to confirm compliance |

| **Planning (P) Phase Activities** | | | |
|---|---|---|---|
| P2 | Water Resources | Contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for any project disturbing 1 or more acres. SWPPP shall be submitted to the Coast Guard Environmental Representative for review a minimum of 21 working days prior to the commencement of work. The Coast Guard Environmental Representative is solely responsible for reviewing, providing comments, and approving SWPPP and Erosion Control Plans and any required or necessary communication with regulatory agencies. The Contractor shall ensure work does not commence until the SWPPP or Erosion Control Plan has been approved by Coast Guard Environmental Representative | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| P3 | Hazardous Materials and Wastes | Contractor shall complete a Construction and Demolition Plan, as necessary and appropriate, prior to start of work and submit it to Base Seattle / Coast Guard Environmental Representative. The plan will capture the DB Contractor's estimated tonnage of construction and demolition waste that would be recycled or disposed. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to complete plan<br>▪ Coast Guard Representative to confirm compliance |

| **Design (D) Phase Activities** | | | |
|---|---|---|---|
| D1 | Land Use and Visual Resources, Water Resources, Air Quality and GHG Emissions, Utilities and Public Services | Contractor shall ensure that new facilities are designed to incorporate established standards outlined in the Coast Guard's Configuration Standard Technical Order (CSTO) *New Building Design and Construction* (Shore Infrastructure Logistics Center [SILC]-CSTO-36-71 91 11 12-10) addressing vulnerability to sea level rise and commitments to structural resiliency, long-term sustainability (including minimization of energy consumption, greenhouse gas emissions, waste generation, etc.), and security. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D2 | N/A | Contractor shall ensure all applicable permits (e.g., Clean Water Act Sections 404, 402, and 401) are obtained, as necessary and appropriate, prior to the start of construction activities. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D3 | Geological Resources | Contractor shall ensure all new structures locate all non-industrial/maintenance functions (e.g., administrative, dormitories, dining facility, retail, childcare, fitness center, command and control, building systems, etc.) on the second or higher floor in each respective building. Industrial and maintenance functions will remain on ground level due to the nature of the work. All second floors will be at least 14 feet above ground level to allow a tsunami wave to flow through the ground floor of each building. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| **Design (D) Phase Activities** | | | |
|---|---|---|---|
| D4 | Water Resources, Biological Resources, Hazardous Materials and Wastes | Contractor shall prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan, as necessary and appropriate, to outline procedures to be followed to minimize the likelihood of an accidental spill of petroleum product and to respond in the event of an accidental spill of petroleum product. The SPCC Plan will provide maintenance and/or operational guidance to include, but not limited to:<br>▪ Regular inspection of vehicles and equipment<br>▪ Ensuring that vehicles and equipment are in good physical condition (e.g., no leaks)<br>▪ Specifications to ensure that refueling will not occur on site or will only occur in designated areas that have been identified to eliminate the potential for accidental spills to migration offsite or into waters.<br>The SPCC Plan will identify procedures to ensure that land-based spills will not migrate to groundwater or adjacent surface waters. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D5 | Biological Resources – Birds | Contractor shall ensure bird-friendly building technologies and materials (e.g., bird-friendly glass) and raptor protection measures are included in the design to eliminate or greatly reduce bird mortality in compliance with the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). These features will be applied to new construction and renovation to the extent possible. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D6 | Water Resources | Contractor shall incorporate stormwater infrastructure designs that direct stormwater runoff away from structures / facilities. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D7 | Hazardous Materials and Wastes | Contractor shall incorporate a hazardous waste storage area(s) as necessary into the design documents. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D8 | Utilities and Public Services, Biological Services | Contractor shall ensure lighting is designed to minimize upward light pollution and spill-over into adjacent properties and waters to the extent practicable. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D9 | Utilities and Public Services | Contractor shall incorporate building energy conservation, efficiency, and management by promoting sustainable acquisition and procurement. This includes ensuring that all new construction includes the incorporation of climate resilient design and management elements. | ▪ FDCC to ensure inclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D10 | Utilities and Public Services | Contractor shall provide secondary containment systems and leak detection equipment for stand-by and emergency generator fuel tanks. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| D11 | Utilities and Public Services | Contractor shall ensure designs comply with all applicable Unified Facilities Criteria (UFC). | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply |

| | | | |
|---|---|---|---|
| **Design (D) Phase Activities** | | | |
| | | | ▪ Coast Guard Representative to confirm compliance |
| D12 | N/A | The Coast Guard shall ensure that the design of the project takes place within the analyzed scope of the PEIS and associated Record of Decision. Should the scope or footprint of the project change, or new design details prompt tiered or supplemental NEPA analysis, the Action Proponent (CG-43) shall contact the Coast Guard's NEPA Program Manager. | ▪ Coast Guard Representative to confirm compliance |
| D13 | Noise | Contractor shall ensure project elements that include sensitive noise receptors (e.g., Unaccompanied Personnel Housing, Child Development Center, renovation of Building 7 / Homeless Shelter) incorporate appropriate designs consistent with applicable UFC to achieve compliance with Federal Interagency Committee on Noise (FICON) recommendations / guidance with respect to interior noise environments for sensitive receptors. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Design Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| C1 | N/A | Coast Guard shall ensure that all design measures in the PEIS are carried forward during construction. | ▪ Coast Guard Representative to confirm compliance |
| C2 | N/A | Coast Guard shall ensure that the Contractor's implemented Environmental Protection Plan includes the requirements of the PEIS and any agency consultations. | ▪ Coast Guard Representative to confirm compliance |
| C3 | N/A | Coast Guard shall ensure that all Contractor personnel receive General Environmental Awareness training and all applicable Environmental Standard Operating Procedures training prior to the commencement of any work at Base Seattle. A copy of the training attendance roster shall be maintained in the Coast Guard's project files and posted at the work site. | ▪ Coast Guard Representative to confirm compliance |
| C4 | N/A | Contractor shall ensure that laydown and staging areas are inside the project boundary and delineated on the grading plans. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C5 | Geological Resources | Contractor shall ensure that no fill slopes are steeper than 2:1 (horizontal-to-vertical). Proposed cut slopes shall be determined by soil characteristics. Assess the shear strength characteristics of the particular soil or rock conditions present for safe allowable slope heights. | ▪ FDCC to ensureinclusion in the SOW/plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C6 | Geological Resources, Air Quality, Water Quality | Contractor shall ensure that all disturbed slopes or other graded features are properly stabilized. The construction shall be phased to minimize disturbed ground, exposed area, and sediment runoff/fugitive dust potential. Cover stockpiled soil and dump truck loads; use windbreak enclosures; and apply water and / or other soil stabilizers. Any water released during fugitive dust control will be managed to ensure that no water has the potential to be discharged to Elliott Bay. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ DB Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| C7 | Geological Resources, Hazardous Materials and Wastes | Contractor shall ensure that, if contaminated soils are encountered, the Coast Guard Environmental Representative is immediately contacted. No work shall proceed until the contamination has been evaluated. Any contamination shall be managed in accordance with all applicable laws and regulations. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C8 | Biological Resources – Birds | The Contractor shall conduct pre-construction surveys for migratory birds. If construction activities occur during the recognized avian breeding season (generally April 1 through August 31), construction shall occur in accordance with the MBTA to avoid impacts to nesting migratory birds potentially occurring within the project areas. Specifically, a contracted qualified biologist shall check the project areas for nests no more than three days prior to the start of construction. If the biologist finds an active nest (or nest cavity), construction workers shall not disturb the nest or adjacent areas until the biologist determines the nest is no longer in use. If an active nest (defined as a bird building a nest, sitting on a nest, carrying food to young, etc.) is found, then the following buffers may apply: 500 feet for raptors and 300 feet for all other bird species. The buffer will remain around the nest until the biologist determines that young have successfully fledged and are no longer dependent upon the nest. If the nest presents an immediate risk to health and safety, the Coast Guard Environmental Representative shall be notified and will be coordinated with the USFWS MBTA program. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C9 | Biological Resources | Should construction activities occur outside of standard daylight working hours, Contractor shall minimize upward light pollution and avoid light spill-over into adjacent properties and water to the extent practicable. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Construction Contractors to comply |
| C10 | Cultural Resources | Contractor shall develop an Incidental Discovery Plan (IDP) for cultural resources in advance of permitting. The IDP will be reviewed and approved by the permitting agency and DAHP prior to construction. The IDP will be implemented during all project-related ground disturbing activities to avoid or minimize potential impacts to unanticipated discoveries of archaeological resources and/or human remains, funerary objects, sacred objects and cultural patrimony. The IDP will include a preconstruction tailgate meeting to familiarize all Contractor personnel with the IDP and the protocols that will be followed in the event of an unanticipated discovery. During ground disturbance activities, the Coast Guard and the Contractor must stop work and immediately and notify the Coast Guard Environmental Representative if archaeological resources are discovered. Crews shall not be permitted to resume work until cleared by the | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| | | Coast Guard Environmental Representative. | |
| C11 | Water Resources | Coast Guard and the Contractor shall ensure that no projects are closed that have stormwater requirements or permits without written consent from the Coast Guard Environmental Representative. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C12 | Water Resources | Contractor shall adhere to Coast Guard policies regarding water conservation measures. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C13 | Water Resources | Contractor shall ensure that any storm water runoff from the construction site is controlled/released to proper storm water channels and clear of any contaminants. BMPs established in the SWPPP will be followed. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C14 | Water Resources, Hazardous Materials and Wastes | Contractor shall ensure that no water, waste stream, or other materials are discharged into storm channels without written pre-approval from the Coast Guard Environmental Representative. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C15 | Air Quality | Contractor shall employ dust abatement measures to minimize fugitive dust emissions during construction. These measures may include watering, application of a commercial polymer-based soil stabilizer product to the laydown and staging areas, or other measures. Obtain Coast Guard Environmental Representative approval prior to the use or application of commercial polymer-based soil stabilizer products. Designate personnel to monitor the dust control program and to increase dust suppression measures (e.g., watering or application of polymer-based soil stabilizer), as necessary, to minimize the generation of dust. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C16 | Air Quality | Contractor shall ensure that fugitive dust from any transport, handling, construction, or storage activity does not remain visible in the atmosphere beyond the project or worksite footprint. Take reasonable precautions to minimize fugitive dust emissions from demolition, excavation, grading, clearing of land, and solid waste disposal operations. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C17 | Air Quality and GHG Emissions | Contractor shall adhere to the emission limits for engines as regulated by the Washington State Department of Ecology. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| C18 | Air Quality and GHG Emissions | Contractor shall ensure all paints, coatings, adhesives, and solvents use/applications follow the guidelines established by the Washington State Department of Ecology and specific project plans and specifications. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C19 | Air Quality and GHG Emissions | Contractor shall ensure that refrigerant used in air conditioning units is a non-chlorofluorocarbon or hydrofluorochlorocarbon. If refrigerants are released, the Contractor shall immediately notify the Coast Guard Environmental Representative of all refrigerant releases and estimated amount of release. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C20 | Biological Resources | Contractor shall create and implement a green landscaping design plan, as necessary and appropriate, that will incorporate environmentally friendly practices and encourage use of native vegetation. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C21 | Hazardous Materials and Wastes | Hazardous materials and wastes at Base Seattle shall be managed under the Hazardous Waste Management Model (Commandant Instruction [COMDTINST] M16478.1B). If previously unknown hazardous materials or wastes are found at the work site, including but not limited to underground storage tanks, burn pits, or any contaminated soils, the Contractor shall immediately stop work and notify the Coast Guard Environmental Representative. | ▪ FDCC to ensure inclusion in pre-construction kickoff meeting<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C22 | Hazardous Materials and Wastes; Water Quality | Contractor shall provide proper storage of hazardous materials during construction, implement routine procedures and practices to prohibit the storage of uncovered hazardous substances in outdoor areas, and ensure that all paints, solvents, and equipment used in painting are handled per project specific SWPPPs and are not washed out on the ground. | ▪ FDCC to ensure inclusion in pre-construction kickoff meeting<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C23 | Hazardous Materials and Wastes, Biological Resources | To prevent attracting wildlife to the project site, Contractor shall ensure all trash is contained in closed receptacles and removed on a regular basis (e.g., weekly or more frequently, as necessary). | ▪ FDCC to ensure inclusion in pre-construction kickoff meeting<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C24 | Hazardous Materials and Wastes | Permanent or temporary relocation of pesticides, herbicides, and other hazardous materials or wastes associated with construction or demolition activities shall comply with Coast Guard guidance for such materials. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C25 | Hazardous Materials and Wastes, Water Quality | Contractor shall ensure that all portable toilets are staked or tied down to prevent spillage. Portable toilets may not be placed within 20 feet of any storm channel or natural drainage. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C26 | Hazardous Materials and Wastes | Contractor shall immediately report any releases of hazardous materials to the Coast Guard Environmental Representative who can be reached 24 hours a day. All documentation and external communications regarding spills / releases and notifications will be conducted by led by the Coast Guard Environmental | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| | | Representative. | |
| C27 | Hazardous Materials and Wastes | Contractor shall use a licensed hauler to have hazardous waste items manifested off-base, as appropriate. The manifesting of hazardous waste shall be coordinated with the Coast Guard Environmental Representative. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C28 | Utilities and Public Services | Contractor shall ensure any irrigation installed uses a water-wise approach. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C29 | Geological Resources, Utilities and Public Services | Contractor shall ensure any flowing or flushing of fire hydrants is performed with the use of a diffuser to reduce erosion of surrounding soils as may be applicable. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C30 | Utilities and Public Services | Contractor shall ensure any aboveground storage tank system(s) are properly labeled and installed. All aboveground storage containment tanks shall have secondary containments and be in compliance with Federal, state, and local regulations. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C31 | Transportation | For any construction that will result in activities and/or substantial generation of traffic outside the project site / Base Seattle boundaries, the Contractor shall prepare a Traffic Management Plan to establish clear wayfinding / traffic routing, ensure separation of re-routed traffic and pedestrians, etc. These Traffic Management Plans will be coordinated with the Washington Department of Transportation and/or Seattle Department of Transportation, as appropriate, prior to implementation. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C32 | Transportation | Contractor shall schedule construction-related vehicle travel to and from the Base during non-peak hours to the extent practicable. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C33 | Transportation | Contractor shall, to the extent practicable, keep all construction equipment and construction-related vehicles onsite for the duration of independent construction projects. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C34 | Noise | Contractor shall ensure construction equipment complies with City of Seattle Noise Control Ordinance guidance, including use of low-noise emission equipment, minimization of idling time for equipment, and positioning of stationary equipment away from noise-sensitive uses. | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to confirm compliance |
| C35 | Noise | Contractor shall ensure construction activities comply with City of Seattle Noise Control Ordinance guidance, including operations of general construction equipment from 7:00AM to 10:00 PM weekdays and pile driving and jack hammer related construction | ▪ FDCC to ensure inclusion in the plans and specifications<br>▪ Contractor to comply<br>▪ Coast Guard Representative to |

| ID # | Resource Area(s) | Environmental Conservation Measure | Responsible Organization |
|---|---|---|---|
| **Construction (C) Phase Activities** | | | |
| | | work from 8:00 AM to 5:00 PM on weekdays. | confirm compliance |
| C36 | Cultural Resources | The Coast Guard Sector Puget Sound Tribal Liaison shall coordinate with the Muckleshoot Indian Tribe and the Suquamish Tribe regarding any construction related vessel traffic in accordance with Coast Guard public involvement planning and protocols to minimize impacts on tribal fisheries or usual and accustomed (U&A) fishing rights. Prior to the construction, a meeting shall be conducted between the Coast Guard, construction and environmental contractors, and tribal representatives to discuss specific construction vessels or other issues, concerns, and the construction schedule, as well as to promote general safety and awareness. | ▪ TBP |
| C37 | Cultural Resources | The Coast Guard will coordinate with construction contractors and Tribal representatives during permitting for specific development projects conducted throughout the recapitalization of Base Seattle to ensure avoidance of impacts on U&A resources. | ▪ TBP |
| **Post-Construction (PC) Phase Activities** | | | |
| PC1 | N/A | Coast Guard shall confirm that all construction has been executed in accordance with the applicable contract and design specifications and permits, including but not limited to all applicable ECMs. | ▪ Coast Guard Representative to confirm compliance |

# Appendix F:
# Summary of Regulatory Requirements

# Appendix F
# Summary of Regulatory Requirements

The following provides a concise summary of federal, state, and local environmental laws, regulations, and approved relevant management plans for which the Proposed Action has been evaluated with respect to compliance.

## National Environmental Policy Act

The National Environmental Policy Act (NEPA) requires that federal agencies consider potential environmental consequences of their proposed actions. The law's intent is to protect, restore, or enhance the environment through well-informed federal decisions. The Council on Environmental Quality (CEQ) was established under NEPA the purpose of implementing and overseeing federal policies as they relate to this process. In 1978, the CEQ issued *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (40 Code of Federal Regulations [CFR] §§1500-1508). These regulations specify that an Environmental Impact Statement (EIS) be prepared in the following manner:

- EISs shall be analytic rather than encyclopedic.
- Impacts shall be discussed in proportion to their significance. There shall be only brief discussion of other than significant issues. As in a finding of no significant impact, there should be only enough discussion to show why more study is not warranted.
- EISs shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with its regulations. Length should vary first with potential environmental problems and then with project size.
- EISs shall state how alternatives considered in it and decisions based on it will or will not achieve the requirements of NEPA and other environmental laws and policies.
- The range of alternatives discussed in EISs shall encompass those to be considered by the ultimate agency decisionmaker.
- Agencies shall not commit resources prejudicing selection of alternatives before making a final decision.
- EISs shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.

In July 2020, CEQ provided updated guidance specific to compliance with NEPA (*Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act*) intended to streamline environmental review of federally approved or funded projects (Federal Register, Vol. 85 No. 186); that guidance went into effect in September 2020. In April 2022, CEQ provided revisions to that guidance (*National Environmental Policy Act Implementing Regulations Revisions*) intended to generally restore provisions that were in effect for decades before being modified in 2020 (Federal Register, Vol. 87 No. 76); the updated guidance went into effect of May 20, 2022.

In October 2021, as part of a whole-of-government approach to tackling the climate crisis and confronting environmental injustice, CEQ is proposing to restore three core procedural provisions of NEPA regulations "to provide communities and decision makers with more complete information about proposed projects, their environmental and public health impacts, and their alternatives." The "Phase 1" proposed rule – currently undergoing public comment – would restore key regulatory provisions that were modified in 2020:

1. Restore the requirement that federal agencies evaluate all the relevant environmental impacts (i.e., direct, indirect, and cumulative) of the decisions they are making.
2. Restore the full authority of agencies to work with communities to develop and analyze alternative approaches that could minimize environmental and public health costs.
3. Establish CEQ's NEPA regulations "as a floor, rather than a ceiling" for environmental review standards that federal agencies should be meeting, thereby restoring the ability of Federal agencies to tailor their NEPA procedures, consistent with the CEQ NEPA regulations, to help meet the specific needs of their agencies, the public, and stakeholders.

Further, to comply with other relevant environmental requirements (e.g., Endangered Species Act of 1973 [ESA], National Historic Preservation Act [NHPA], Clean Water Act, etc.) in addition to NEPA and to assess potential environmental impacts, the decision-making process for the Proposed Action involves a thorough examination of all environmental issues pertinent to the Proposed Action.

## 1.1 Transportation

### 1.1.1 Federal

The Federal Highway Administration regulates highways and highway operations.

### 1.1.2 State and Local

Highway and street operations in Seattle are also regulated and implemented by Washington State Department of Transportation (WSDOT) and Seattle Department of Transportation (SDOT). Regulatory policies and procedures related to the construction, operation, and management of roadways include the Transportation Research Board's *Highway Capacity Manual*; the American Association of State Highway and Transportation Official's *Policy on Geometric Design of Highways and Streets* and *Highways Safety Manual*; the *Transportation Resource Manual* issued by the Washington State Legislature Joint Transportation Committee; transportation and traffic

manuals and publications issued by WSDOT; and the SDOT's *Right of Way Improvement Manual (Streets Illustrated)*, *Traffic Control Manual*, and *Right of Way Opening and Restoration Rule*.

WSDOT plans, funds, and implements construction and maintenance of the state's multimodal transportation system. In addition to building, maintaining, and operating the state highway system, WSDOT is responsible for the state ferry system, and contributes to maintain and improve local roads, railroads, and airports, as well as supports alternatives to driving such as public transportation, bicycle, and pedestrian programs. WSDOT is also responsible for developing the Statewide Transportation Improvement Program (STIP) in coordination with regional and local partners. The STIP includes projects such as pavement overlays, roadway widening, bridge replacement or repair, signal systems, safety enhancements, bicycle and pedestrian facilities, and transit improvements.

The STIP also includes projects from transportation improvement programs developed by each state Metropolitan Planning Organization. The Puget Sound Regional Council serves as the lead agency for the federally designated Metropolitan Planning Organization and the state-designated Regional Transportation Planning Organization. The Puget Sound Regional Council is required to develop a Regional Transportation Improvement Program for the region that includes King, Kitsap, Pierce, and Snohomish Counties. The agency has developed the *Transportation Improvement Program* for the 2021-2024 period, which provides a summary of federally, state-, and locally funded transportation projects currently underway, as well as *The Regional Transportation Plan – 2018*, which supports improvements to regional highway, transit, rail, ferry, bicycle, and pedestrian systems to support the safe and efficient movement of people and goods.

## 1.2 Noise

### 1.2.1 Federal

The Noise Control Act of 1972 establishes a national policy to promote an environment free from noise that jeopardizes health and welfare. The U.S. Environmental Protection Agency (USEPA) has no regulations governing environmental noise; however, the USEPA has conducted extensive studies to identify the effects of sound levels on public health and welfare. The USEPA "Levels Document" identifies sound levels "requisite to protect the public health and welfare with an adequate margin of safety." Because the cost of feasibility of achieving these sound levels was not taken into consideration, these levels are guidelines, not regulations or standards. The USEPA specifies an outdoor day-night sound level (Ldn) of 55 A-weighted decibels (dBA) for areas where quiet is a basis for use (i.e., residential areas). This the same level as defined in Washington Administrative Code (WAC) Chapter 173-60-040 as described below.

The U.S. Coast Guard (Coast Guard) NEPA Implementing Procedures (Commandant Instruction [COMDTINST] M16475.1-D) require a discussion of the existing conditions including relevant local noise regulations. Additionally, the Coast Guard Safety and Environmental Health Manual (COMDTINST M5100.47) establishes requirements for noise, which include compliance with local noise ordinances and the identification and assessment of hazardous noise sources. The Coast Guard defines a hazardous noise as continuous sound levels exceeding 84 dBA or impact noises exceeding 140 dBA.

### 1.2.2 State and Local

Noise in the state of Washington is regulated under the Noise Control Act of 1974 including rules and regulations of WAC Chapter 173-60-040 which sets maximum environmental noise levels for three classes of *environmental designations for noise abatement* (EDNA). EDNA zones are defined with respect to land usage and can usually be transferred to previously established classifications in existing zoning ordinances or comprehensive plans. For example, industrial zoned properties (such as Base Seattle) are allowed higher noise emissions (70 dBA) than residential areas (60 dBA). These state level regulations and limits are mirrored in the City of Seattle's local noise control ordinance. Per the City's noise ordinance, industrial uses are permitted an increase of up to 25 dBA between 7:00 AM and 10:00 PM on weekdays and 9:00 AM and 10:00 PM on weekends.

**Table F-1. Maximum Permissible Environmental Noise Levels**

| EDNA (District) of Noise Source | EDNA (District) of Receiving Property | | |
|---|---|---|---|
| | Class A (Residential) Day / Night (dBA) | Class B (Commercial) | Class C (Industrial) |
| Class A (Residential) | 55 / 45 | 57 | 60 |
| Class B (Commercial) | 57 / 47 | 60 | 65 |
| Class C (Industrial) | 60 / 50 | 65 | 70 |

Source: WAC 173-60-040 2019; Seattle Municipal Code 2020a

Under City of Seattle Municipal Code 25.08.425, the sound level limits established by Municipal Code Section 25.08.410 may be exceeded for non-impact construction equipment used on public projects between 7:00 am and 10:00 pm on weekdays, and between 9:00 am and 10:00pm on weekends and legal holidays, by no more than the following:

- 25 dBA for equipment for construction sites, including, but not limited to, crawlers, tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, graders, off-highway trucks, ditchers, trenchers, compactors, compressors, and pneumatic-powered equipment
- 20 dBA for portable-powered equipment used in temporary locations in support of construction activities or used in the maintenance of public facilities, including but not limited to, chainsaws, log chippers, lawn and garden maintenance equipment, and hand-powered tools.

- 15 dBA for powered equipment used in temporary or periodic maintenance or repair of the grounds and appurtenances of residential property, including but not limited to, lawnmowers, powered hand tools, snow-removal equipment, and composters.

For impact types of equipment, including, but not limited to, pavement breakers, pile-drivers, jackhammers, sandblasting tools, or other types of equipment that create impulse sound or impact sound, the sound level limits established by Municipal Code Section 25.08.425 may be exceeded in any 1-hour period between 8:00 am and 5:00 pm on weekdays and 9:00 am and 5:00 pm on weekends and legal holidays, but in no event may the sound level for impact types of equipment exceed the following:

- equivalent continuous sound level (Leq) 90 dBA continuously
- Leq 93 dBA for 30 minutes
- Leq 96 dBA for 15 minutes
- Leq 99 dBA for 7.5 minutes

Sound levels in excess of Leq 99 dBA are prohibited unless authorized by variance. Construction impact equipment that produces sound levels less than 90 dBA must comply with sound level requirements for non-impact equipment between 7:00 am and 8:00 am, and again between 5:00 pm and 10:00 pm on weekdays, and between 9:00 am and 10:00 pm on weekends and legal holidays.

The sound levels for all types of construction equipment are measured at the property line of the receiver or at a distance of 50 feet from the equipment making the sound, whichever is greater.

## 1.3 Land Use and Visual Resources

### 1.3.1 Federal

Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) recognizes the value of the nation's Coastal Zone (Coastal Zone) and is intended to protect the coast as a resource. This Act is administered by the National Oceanic and Atmospheric Administration (NOAA) and provides for the management of the nation's coastal resources. CZMA aims to preserve, protect, develop, and where possible, restore or enhance the resources of the Coastal Zone. CZMA outlines the National Coastal Zone Management Program, which aims to balance competing land and water issues through state and territorial coastal management programs.

### 1.3.2 State and Local

Washington Coastal Management Program

The CZMA authorizes states with approved Coastal Zone Management Programs to review the following actions:

- Federal agency activities, including issuance of federal funding that may affect the state's coastal uses or resources.
- Activities and projects that require a federal permit.

For Washington, the State Department of Ecology (Department of Ecology) has been delegated these review responsibilities to determine if they are consistent with the enforceable policies of the approved Washington Coastal Zone Management Program. The federal consistency review process enhances coordination and cooperation between the state, federal agencies, and applicants for federal licenses and permits and connects with existing state coastal legislation (e.g., State Shoreline Management Act [SMA]).

State Ocean Resource Management Act

The law requires the Department of Ecology to develop guidelines and policies for the management of ocean uses and to serve as the base for evaluation and modification of local shoreline management master programs and coastal local governments. The Act applies to Washington's coastal waters, seabeds, and shorelines.

State Shoreline Management Act

The Shoreline Management Act (SMA) requires all counties in the state with shorelines to develop and implement Shoreline Master Programs. SMA's goal is to prevent harm from uncoordinated and piecemeal development of the state's shoreline. SMA defines the state's role in reviewing and approval local shoreline programs. Policies relate to shoreline use, environmental protection, and public access. Preferred uses include single-family residences, ports, shoreline recreational uses, water-dependent industrial and commercial development, and other developments providing public access.

State Environmental Policy Act

Washington's State Environmental Policy Act (SEPA) was enacted in 1971 to ensure state and local agencies consider the effects of the environment during decision-making processes. The goal of SEPA is to promote efforts which will prevent or eliminate damage to the environment. Additionally, SEPA provides a state policy to encourage the productive and enjoyable harmony between humankind and the environment in land uses.

Growth Management Act

The State's Growth Management Act (GMA) includes an element that recognizes the importance of port terminals, designating them as "essential public facilities" and identifying them as important contributors to the regional economy. In 2009, the *Container Port Element* was introduced into the GMA, amending the original Act to ensure that land use decisions consider the broad, long-term economic contribution of international port terminals and related industrial and transportation systems to the economic health of the region.

Base Seattle Area Development Plan

The ADP currently under preparation for Base Seattle provides: 1) concepts focused on the Base's capabilities to homeport major cutters over the next 25 years; 2) a strategic document to assist in discussing the operational laydown of afloat assets; and 3) an indicator of the Base's possible reconfiguration to support the status quo or an inventory of six or eight major cutters.

City of Seattle's Comprehensive Plan

The City of Seattle's Comprehensive Plan is a 20-year vision and roadmap for Seattle to guide development and goals for the environment and residents. The four core values include community, environmental stewardship, economic opportunity and security, and race and social equity. The Plan identifies goals to direct growth to existing urban centers, monitor growth in locations of low-income households and people of color to avoid risk of displacement, contribute to the vibrancy of neighborhood centers, reinforce the benefits of City investments in infrastructure, and guide how the City will engage the public in decision making. The City's Plan includes several elements relevant to the Project area, including the *Container Port Element*, finalized in 2012.

City's Zoning Ordinance

The City's Zoning Code governs the use and development on lands within the City limits. Zoning districts specify a category of use and are applied for development. Base Seattle is located in IG1 U/85 (General Industrial 1), Greater Duwamish Manufacturing Industrial, which is an Industrial Zone and permits only industrial and commercial uses. The intent of the IG1 zone is to protect marine and rail-related industrial areas from an inappropriate level of unrelated retail or commercial uses by limiting these uses to a density or size limit lower than allowed for industrial uses. Industrial Zones prohibit residential development, provide exceptions to structure height (e.g., rooftop features including radio and receiving antennae or parapets), require venting of odors, vapors and smoke, require parking in accordance with 23.54.015 of the Zoning Code, and require lots within the shoreline district to provide a view corridor in accordance with the Shoreline Master Program. However, because Base Seattle is a federal property managed by the Coast Guard, the City Zoning Code is not directly applicable to the facility.

## 1.4 Biological Resources

### 1.4.1 Federal

Endangered Species Act of 1973

The ESA (16 United States Code [USC] §1531 *et seq*.) recognized that economic growth and development in the United States had rendered various fish, wildlife, and plant species extinct due to lack of adequate concern and conservation. It also pointed out that other species were in the same danger of, or were also threatened with, extinction as a result of depleted numbers.

These sensitive natural resources were deemed to be of "esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people." Therefore, the ESA was created to protect and recover those species classified as imperiled and the ecosystems upon which they depend. The ultimate goal of the ESA is to recover species to the point they no longer require protection

The ESA categorizes species as either endangered or threatened. "Endangered" is defined as a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" is defined as a species that is likely to become endangered within the foreseeable future. All species of plants and animals are eligible for listing, with the exception of pest insects, and may include subspecies, varieties, and, for vertebrates, distinct population segments (DPSs). "Candidate" species are those species for which there is enough information to warrant proposing them for listing but have been sidelined due to higher listing priorities.

The ESA also requires federal agencies to designate "critical habitat" for listed species if prudent and determinable. Critical habitat is defined as those geographic areas that contain physical or biological features that are essential to the conservation of the species and that may need special management or protection.

One way the ESA protects endangered and threatened species and their habitats is by prohibiting the "take" of listed animals. The definition of "take" can include harassment, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting of a listed species or any attempt to engage in such conduct. Such acts may include significant habitat modifications or degradation that can result in death or injury to a wildlife species through significant impairment of essential behavioral patterns, including breeding, feeding, or sheltering.

Terrestrial and freshwater species designated as federally threatened or endangered (or candidate species for listing) by the ESA are managed by the U.S. Fish and Wildlife Service (USFWS). Whereas marine wildlife, such as whales and anadromous fish, such as salmon, are managed by the National Marine Fisheries Service (NMFS). Section 7 of the ESA requires Federal agencies to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. Federal agencies are also required to avoid "destruction" or "adverse modification" of designated critical habitat.

<u>Magnuson-Stevens Fishery Conservation and Management Act</u>

The Magnuson-Stevens Fishery Conservation and Management Act (MSA), as amended (H16 USC 1801 et seq.) established: (1) a fishery conservation zone between the territorial seas of the U.S. and 200 nautical miles offshore; (2) an exclusive U.S. fishery management authority over fish within the fishery conservation zone (excluding highly migratory species); (3) regulations for foreign fishing within the fishery conservation zone through international fishery agreements, permits, and import prohibitions; and (4) national standards for fishery conservation and

management and eight regional fishery management councils to apply those national standards in fishery management plans.

Congress enacted the 1996 amendments to the MSA, known as the Sustainable Fisheries Act (SFA) (Public Law [P.L.] 104-297), to address the substantially reduced fish stocks that declined as a result of direct and indirect habitat loss. The SFA requires that agencies consult with NOAA Fisheries concerning actions that may adversely impact Essential Fish Habitat (EFH). There is a requirement for the Coast Guard to consult with the NMFS per the EFH provision if there "may be adverse effect to EFH" from implementation of the Proposed Action.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC §§703-712) was enacted in 1916 in a time when many bird species were threatened by the commercial trade in birds and bird feathers. It is one of the first federal environmental laws passed in the U.S. and currently serves to protect birds that migrate between northern summer breeding grounds and southern overwintering grounds. It is a treaty between the U.S. and four other countries that makes it unlawful to pursue, hunt, take, capture, kill, or sell birds listed therein as migratory birds native to the U.S. or its territories without a special waiver issued by the USFWS. It also does not discriminate between live or dead birds. Therefore, the MTBA grants full protection to any bird parts including feathers, eggs, and nests and also mandates protection for habitats and environs necessary for migratory bird species survival. Currently, there are over 1,000 species protected under the MBTA.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) (16 USC 668 et seq.). was enacted in 1940. This Act prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald or golden eagles and provides criminal penalties for those persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The BGEPA defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

Disturbance of an eagle means “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

In addition to the direct impact on nesting eagles, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment.

Marine Mammal Protection Act

The Marine Mammal Protection Act (MMPA) was passed by congress in 1972 in response to increasing public and scientific concern that significant declines in some species of marine mammals were caused by human activities. The MMPA was the first legislation to mandate an ecosystem-based approach to marine resource management by establishing a national policy to prevent marine mammal species and population stocks from declining beyond the point where they ceased to be significant functioning elements of the ecosystems of which they are a part.

The MMPA protects all marine mammals by prohibiting the "taking" of any marine mammal species within waters of the United States. According to the MMPA, "take" means to hunt, harass, capture, or kill any marine mammal or attempt to do so. The MMPA also prohibits the import and export of marine mammals and their parts or products. "Harassment" is further defined as "any act of pursuit, torment, or annoyance, which…has the potential to injure a marine mammal or marine mammal stock in the wild (Level A harassment); or has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering (Level B harassment)."

Three Federal entities share responsibility for implementing the MMPA. NOAA Fisheries is responsible for the protection of whales, dolphins, porpoises, seals, and sea lions. The USFWS is responsible for the protection of walrus, manatees, sea otters, and polar bears and the Marine Mammal Commission provides independent, science-based oversight of domestic and international policies and actions of federal agencies addressing human impacts on marine mammals and their ecosystems.

### 1.4.2 State and Local

Washington Hydraulic Project Approval

Washington State law (Revised Code of Washington [RCW] 77.55) requires people planning hydraulic projects in or near state waters to get a Hydraulic Project Approval from the WDFW. This includes most marine and fresh waters. A Hydraulic Project Approval ensures that construction is done in a manner that protects fish and their aquatic habitats.

Washington Shoreline Management Act

The SMA requires all counties and most towns and cities with shorelines to develop and implement Shoreline Master Programs. The law also defines our role in reviewing and approving local programs. The SMA was passed by the Washington Legislature in 1971 and adopted by voters in 1972. Its overarching goal is "to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines."

The SMA applies to all 39 Washington counties and about 250 towns and cities with stream, river, lake or marine shorelines. These shorelines include: All marine waters, streams and rivers with

greater than 20 cubic feet per second mean annual flow, Lakes 20 acres or larger, upland areas called shorelands that extend 200 feet landward from the edge of these waters, biological wetlands and river deltas connected to these water bodies, and some or all of the 100-year floodplain, including all wetlands.

The SMA is intended to protect shoreline natural resources including the land, vegetation, wildlife, and aquatic habitats against adverse environmental effects. All allowed uses are required to offset adverse environmental impacts as much as possible and preserve the natural character and aesthetics of the shoreline.

State Environmental Policy Act

The SEPA process identifies and analyzes environmental impacts associated with governmental decisions. These decisions may be related to issuing permits for private projects, constructing public facilities, or adopting regulations, policies, and plans.

The SEPA review process helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment. SEPA can be used to modify or deny a proposal to avoid, reduce, or compensate for probable impacts. The Department of Ecology oversees the rules and guidance for the state and provides technical assistance to agencies, applicants, and citizens as they participate in the SEPA review process.

## 1.5 Cultural Resources

### 1.5.1 Treat of Point Elliott

The Washington Territory was organized on behalf of the United States in 1853. Joel Palmer, Superintendent of Indian Affairs for the Oregon Territory, and Isaac I. Stevens, Governor and Superintendent of Indian Affairs of the Washington Territory, were selected to represent Indian Policies for the Northwest in the same year. At Point Elliott, Stevens met with the Duwamish, Suquamish, Snoqualmie, Snohomish, Lummi, Skagit, Swinomish (in order of signing), as well as other tribes on January 22, 1855 to sign a treaty. One of the Snoqualmie Indian chiefs signed in the name of the Stillaguamish, Snohomish, and Snoqualmie Indians (12 Stat. 971). The Treaty of Point Elliott was ratified later in 1859, guaranteeing both off-reservation fishing rights at all U&A grounds and stations and the creation of reservations for the Suquamish, Tulalip, Swinomish, and Lummi tribes (12 Stat. 927 [1855]). As a result of the treaty, the tribes relinquished the majority of their lands. Reservations were not designated for the Duwamish, Skagit, Snohomish, and Snoqualmie tribes at this time.

The tribes' reserved rights were reaffirmed in 1974 (and upheld in 1979) during the United States vs. Washington court case that was named for trial court judge, George Hugo Boldt. The Boldt Decision reaffirmed the right of the Indian tribes in Washington State to co-manage salmon and

other fish with the state, and also to continue harvesting fish in accordance with the various treaties (384 F. Supp. 312, W. Dist. WA, (1974)).[1]

### 1.5.2 Federal

National Historic Preservation Act

The NHPA of 1966 (16 USC 470 et seq.), as amended, requires federal agencies to identify and manage historic properties that are under their jurisdiction. The NHPA encourages the preservation of historic properties through consultation and cooperation with state and local governments, Indian tribes, and private individuals. It outlines the federal government's roles in preserving historic properties, considering effects on historic properties, and avoiding activities that would be contrary to its purpose. The NHPA outlines the roles of the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers (SHPOs), and Tribal Historic Preservation Officers.

Section 106 of the NHPA (16 USC 470f and 36 CFR 800) requires that the lead federal agency with jurisdiction over a federal undertaking (i.e., a task, activity, or program that is funded by a federal agency or that requires a federal permit, license, or approval) consider the potential for task effects on historic properties listed in or eligible for the National Register of Historic Places (NRHP) before that undertaking occurs. In addition, federal agencies must consult with the SHPO, federally recognized Indian tribes, applicants for federal assistance, local governments, and any other interested parties regarding the proposed undertaking and its potential effects on historic properties. The goal of consultation is to identify historic properties potentially affected by an undertaking, assess the undertaking's effects, and seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. Historic and cultural resources, as well as districts, sites, highways, structures, or objects listed in the NRHP are evaluated under NEPA.

The NRHP (16 USC 470a), created under the NHPA, is the federal list of historic, archaeological, and cultural resources worthy of preservation. Resources listed in the NRHP include districts, sites, buildings, structures, and objects that are significant in American history, prehistory, architecture, archaeology, engineering, and culture. The NRHP is maintained by the National Park Service (NPS) on behalf of the Secretary of the Interior (SOI). The DAHP administers the statewide NRHP program under the direction of the SHPO, located in Olympia, Washington. The NPS has developed NRHP Criteria for Evaluation (36 CFR § 60.4) to guide the evaluation of cultural resources that may be either listed in or eligible for the NRHP. To be eligible for the NRHP, a resource must have sufficient historical integrity to reflect its connection to the past. National Register Bulletin (NRB) 15, "How to Apply the National Register Criteria for Evaluation," provides guidance on evaluating resources for listing in the NRHP (NPS 1997). NRB 15 outlines the seven aspects of integrity, which include location, design, setting, materials, workmanship, feeling, and association. In addition to possessing integrity, the resource must satisfy one or more of the following NRHP Criteria of Evaluation:

[1] 384 F. Supp. 312 (W.D. Wash. 1974), aff'd, 520 F.2d 676 (9th Cir. 1975).

- Criterion A: Are associated with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B: Are associated with the lives of persons significant in our past; or
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history.

Amendments to Section 106 of the NHPA specify that properties of religious and cultural significance (including traditional cultural properties [TCPs]) may be determined to be eligible for inclusion in the NRHP. In carrying out their responsibilities under Section 106, federal agencies are required to consult with any Indian tribes or Native Hawaiian organizations that attach religious or cultural significance to any such properties within the area of potential effects (APE) of a proposed federal undertaking.

NRB 15 provides guidance on evaluating resources for listing in the NRHP. While cultural resources may be present within the APE, if they do not meet the requirements for listing in the NRHP, they are not considered "historic properties," as defined in the NHPA. To be listed in the NRHP, a property must have integrity, which is defined as its ability to convey its significance. There are seven aspects or qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association. A cultural resource being considered for eligibility must meet several of the aspects of integrity to be eligible for listing (as per NRB 15). Additional guidance is provided through NRB 36, "Guidelines for Evaluating and Registering Archaeological Properties" and NRB 38 "Guidelines for the Evaluation and Documentation of Traditional Cultural Properties." An archaeological site would possess both significance and integrity to be eligible for the register (per NRB 36). Significance is the relative importance of a site within historical context. In addition, the archaeological site must meet at least one of the National Register Criteria (A-D) listed above. Evaluating TCPs includes unique considerations for context, integrity, and significance (as per NRB 38).

Cultural resources less than 50 years old typically do not meet the NRHP criteria (A through D); however there are seven Criteria Considerations that may qualify a resource for the NRHP, as outlined in 36 CFR § 60, NRB No. 15 and No. 22, Guidelines for Evaluating and Nominating Properties That Have Achieved Significance Within the Last 50 Years (NPS 1998a). The Criteria Considerations are as follows:

- Criteria Consideration A: A religious property if it derives its primary significance from architectural or artistic distinction or historical importance; or

- Criteria Consideration B: A property removed from its original or historically significant location if it is significant primarily for architectural value, or it is the surviving property most importantly associated with a historic person or event; or
- Criteria Consideration C: A birthplace or grave of a historical figure if the person is of outstanding importance and if there is no other appropriate site or building associated directly with his or her productive life; or
- Criteria Consideration D: A cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- Criteria Consideration E: A reconstructed property when it is accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived. All three of these requirements must be met; or
- Criteria Consideration F: A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- Criteria Consideration G: A property achieving significance within the last 50 years if it is of exceptional importance.

When a resource has been recommended eligible for listing in the NRHP, Section 106 of the NHPA requires review of potential effects by a proposed action on the resource. As part of the permitting process for these projects, the permitting agency is responsible for completing this review of submitted materials and public consultation.

American Indian Religious Freedom Act of 1978

The American Indian Religious Freedom Act of 1978 (AIRFA) (42 USC 1996 et seq.) establishes the protection and preservation of the inherent right of American Indians, Eskimos, Aleuts, and Native Hawaiians to exercise their traditional religions. The law specifically allows these groups to possess and use sacred objects and to access traditional sites for religious purposes.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001 et seq.) establishes regulations regarding the treatment of any Native American graves, human remains, and/or funerary objects, sacred objects, or objects of cultural patrimony on federal, tribal, and trust lands. Objects of cultural patrimony are objects of central importance to a group as a whole, which cannot be owned or controlled by an individual. Trafficking archaeological resources is a felony under federal law.

Executive Order 13007 of 1996

Executive Order (EO) 13007, Indian Sacred Sites, mandates that federal land managers accommodate sacred sites as they manage federal lands. The executive order requires reasonable notice of proposed actions or land management policies that may restrict access to, or ceremonial use of, or adversely affect the physical integrity of, sacred sites.

Executive Order 13175 of 2009

EO 13175 reaffirms the Federal government's commitment to tribal sovereignty, self-determination, and self-government. Its purpose is to ensure that all Executive departments and agencies engage in regular, meaningful, and robust consultation with Indian tribes for the development of Federal policies that impact Indian communities. The Presidential Memorandum of November 5, 2009, requires each agency to prepare and periodically update a detailed plan of action to implement the policies and directives of EO 13175.

### 1.5.3 State and Local

Washington State law provides for the protection of archaeological resources on public and private lands. Washington State RCW Chapter 27.53, Archaeological Sites and Resources, prohibits unauthorized removal, theft, and/or destruction of archaeological resources and sites. This statute also provides for prosecution, consultation, and the recovery of archaeological resources. Washington State RCW Chapter 27.44, Indian Graves and Records, states that willful removal, mutilation, defacing, and/or destruction of Indian burials constitutes a felony.

Archaeological excavation permits are required from DAHP prior to excavating, removing, or altering Native American human remains or archaeological resources in Washington. The complete requirements for filing a permit application can be found in WAC 25-48-060.

RCW 68.60, Abandoned and Historic Cemeteries and Historic Graves, requires “expeditious” notification of local law enforcement and the coroner if skeletal human remains are discovered. Failure to notify is considered a misdemeanor.

## 1.6 Air Quality

### 1.6.1 Federal

Federal Clean Air Act and Amendments

The Clean Air Act (CAA; 42 USC §7401) was passed in 1963 and amended via the Clean Air Act Amendments (CAAA) in 1990 and was the first comprehensive Federal law to regulate air emissions from stationary and mobile sources. Among other things, the CAA and CAAA authorize the USEPA to establish and enforce National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The NAAQS help to ensure basic health and environmental protection from air pollution. The CAA also gives USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

NAAQS are classified as primary or secondary. Primary standards protect against adverse health effects; secondary standards are designed to protect public welfare, such as prevent damage to farm crops, vegetation, and buildings. Some pollutants have long-term and short-term standards.

Short-term standards are designed to protect against acute, or short-term, health effects while long-term standards are established to protect against chronic health effects.

The CAAA place the responsibility to achieve compliance with NAAQS on individual states, in this case the Department of Ecology. Areas not in compliance with any of the NAAQS may be designated as *nonattainment* areas by the USEPA or the appropriate state or local agency. *Nonattainment* areas are designated for each individual criteria air pollutant addressed by the NAAQS. Once the USEPA declares an area as in *nonattainment*, the USEPA requires each state to prepare a State Implementation Plan (SIP), a compilation of goas, strategies, schedules, and enforcement actions that will lead state into compliance with the NAAQS. Should the state and/or local air agencies fail to develop adequate SIPs, then the USEPA will develop a Federal Implementation Plan to remedy the state's failure. To be re-designated as in *attainment*, the area must show through monitoring and modeling that pollutant levels are consistently meeting the relevant NAAQS and have been maintained for a minimum of two consecutive 10-year periods for each applicable criteria pollutant regulatory area. During this time, the area is designated as *maintenance*.

General Conformity Rule

The General Conformity Rule is part of the CAA promulgated by the USEPA to ensure that the action of Federal departments or agencies conform to the applicable SIP. The General Conformity Rule applies to Federal actions occurring in *nonattainment* or *maintenance* areas. The USEPA General Conformity Rule requires that a conformity analysis be performed to demonstrate that an action would not:

1) Cause or contribute to any new violation of any NAAQS in the area;
2) Interfere with provisions in the SIP for maintenance or attainment of any NAAQS;
3) Increase the frequency or severity of any existing violation of any NAAQS; or
4) Delay timely attainment of any NAAQS, any interim emission reduction, goals, or other milestones included in the SIP for air quality.

Provisions in the General Conformity Rule allow for exemptions from performing a conformity determination only if total emissions of individual nonattainment area pollutants resulting from the action fall below the *de minimis* (i.e., significant) threshold values.

New Source Review and Prevention of Significant Deterioration Review

New major stationary sources and major modifications at existing major stationary sources are required by the CAA to have an air pollution permit before commencing construction. The review process for major stationary sources is required whether the major source or major modification is planned for nonattainment areas or attainment and unclassifiable areas. In general, permits for sources in attainment area and for other pollutants regulated under the major source program are referred to as Prevention of Significant Deterioration (PSD) permits. Additional PSD permitting thresholds (250 tons per year [tpy] per criteria pollutant, 25 tpy for total hazardous

air pollutants (HAPs), and 10 tpy for any single HAP) apply to increases in stationary source greenhouse gas (GHG) emissions. PSD permitting can also apply to a new major stationary source (or any net emissions increase associated with a modification to an existing major stationary source) that is constructed within 6.2 miles of a Class I area and which would increase the 24-hour average concentration of any regulated pollutant in that Class I area by 1 microgram per cubic meter or more.

Title V (Operating Permit)

The Title V Operating Permit Program consolidates all CAA requirements applicable to the operation of a source, including requirements form the SIP, preconstruction permits, and the air toxics program. It applies to stationary sources of air pollution that exceed the major stationary source emission thresholds, as well as other non-major sources specified in a particular regulation. The program includes a requirement for payment of permit fees to finance the operating permit program whether implemented by the USEPA or a state or local regulator. Coast Guard installations subject to Title V permitting are required to comply with the requirements of the Title V Operating Permit Program, which are detailed in 40 CFR Part 70 and all specific requirements contained in their individual permits. Title V permitting is within the State of Washington is managed by USEPA Region 10 and the Puget Sound Clean Air Agency.

Federal Greenhouse Gas Policies and Regulations

On January 20, 2021, President Biden issued EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis* and on January 27, 2021, President Biden issued the EO 14008, *Tackling the Climate Crisis at Home and Abroad*. Amongst other objectives, these EOs set an aspirational target to achieve a net-zero emission economy by 2050 and a carbon-free electricity sector by 2035. In addition, on January 20, 2021, President Biden announced that the U.S. will rejoin the Paris Climate Agreement, and the U.S. became a party to the Agreement on February 19, 2021. The Agreement is a binding international agreement to reduce GHG emissions and impacts due to climate change that was signed by 196 parties on December 12, 2015 and entered into force on November 4, 2016. The Agreement aims to limit global warming to well below 2 °C, and preferably to 1.5 °C, compared to pre-industrial levels. Prior to the U.S. withdrawal from the Agreement in November 2020, the U.S. had proposed a 26 to 28 percent domestic reduction in GHG emissions by 2025 compared to 2005 levels. It is likely that the U.S. would retain or modify these goals upon rejoining the Agreement. On April 22, 2021, the U.S. submitted its nationally determined contribution in line with Article 3 of the Paris Agreement. In the nationally determined contribution, the U.S. is setting an economy-wide target of reducing GHG emissions by 50 to 52 percent below 2005 levels in 2030.

### 1.6.2 State and Local

Washington Clean Air Act

The Washington Clean Air Act (RCW Chapter 70.94) has been adopted to preserve, protect, and enhance the air quality within the State of Washington. WAC Chapter 173-476 establishes maximum acceptable levels for $O_3$, CO, $NO_2$, $SO_2$, $PM_{10}$ and $PM_{2.5}$, and Pb.

The Puget Sound Clean Air Agency is one of seven local clean air agencies in the State of Washington charged with adopting and enforcing air quality regulations under the CAA, CAAA, and Washington Clean Air Act in King, Kitsap, Pierce, and Snohomish counties. The Puget Sound Clean Air Agency's authority includes issuance and enforcement of various air emissions permits including Title V Operating Permit as described above.

**Table F-2. National Ambient Air Quality Standards and Washington Ambient Air Quality Standards**

| Pollutant | Averaging Time | NAAQS[1] | | Washington[2] | Remarks |
|---|---|---|---|---|---|
| | | Primary | Secondary | Standard | |
| Ozone (O3) | 8 hour | 0.070 ppm | | | Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years |
| Carbon Monoxide (CO) | 8 hour | 9 ppm | NSA | 9 ppm | Not to be exceeded more than once per year |
| | 1 hour | 35 ppm | NSA | 35 ppm | |
| Nitrogen Dioxide ($NO_2$) | 1 hour | 100 ppb | NSA | 100 ppb | 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years |
| | Annual | 53 ppb | 53 ppb | 53 ppb | Annual mean |
| Sulfur Dioxide ($SO_2$) | 1 hour | 75 ppb | NSA | 75 ppb | 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years |
| | 3 hour | NSA | 0.5 ppm | | Not to be exceeded more than once per year. |
| | 24 hour | NSA | NSA | 0.14 ppm | Not to be exceeded more than once per year |
| | Annual | NSA | NSA | 0.02 ppm | Not to be exceeded |
| $PM_{10}$ | 24 hour | 150 µg/m$^3$ | | | Not to be exceeded more than once per year on average over 3 years |
| $PM_{2.5}$ | Annual | 12 µg/m$^3$ | 15 µg/m$^3$ | 12 µg/m$^3$ | Annual mean, averaged over 3 years |
| | 24 hour | 35 µg/m$^3$ | | | 98th percentile, averaged over 3 years |
| Lead (Pb) | Rolling 3 month average | | 15 µg/m$^3$ | | Not to be exceeded |

**Notes:**

ppm – parts per million
ppb – parts per billion
µg/m$^3$ – micrograms per cubic meter
NSA – No Standard Applied
Source: USEPA 2020a; WAC Chapter 173-476

## 1.7 Water Resources

Numerous federal, state, and local laws and regulations define the framework for regulating water quality in the Project area. Water quality in Washington is regulated through the Federal Clean Water Act (CWA), which is managed by the USEPA and U.S. Army Corps of Engineers (USACE), with implementation largely delegated to the Department of Ecology. The City of Seattle maintains a Stormwater Code which contains regulatory requirements to provide for, and propose the health, safety, and welfare of, the general public. It includes construction stormwater control guidance and requirements for projects within the City limits. The City also provides regulations and policies to support *environmentally critical areas*.

### 1.7.1 Federal

Clean Water Act of 1972

The federal CWA, enacted in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into waters of the U.S. The CWA gave the USEPA authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants and various industry categories in surface water, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the USEPA and USACE. Some compliance elements of the CWA (e.g., Section 401 Water Quality Certification) are delegated to State agencies.

*CWA Section 303(d): List of Impaired Water Bodies*

Section 303(d) of the CWA requires states to identify waterbodies that do not meet water quality objectives and are not supporting their beneficial uses. Each state must submit an updated list, called the *303(d) list*, to USEPA periodically. In addition to identifying the waterbodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing impairment and establishes a priority for developing a control plan to address the impairment.

*CWA Section 401*

Under Section 401 of the CWA, the Department of Ecology has regulatory authority over actions in waters of the United States located within the State of Washington through the issuance of

water quality certifications. These certifications are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the CWA, described below).

*CWA Section 402: National Pollutant Discharge Elimination System*

In 1987, amendments to the CWA added Section 402, which established a framework to protect water quality by regulating industrial, municipal, and construction-related sources of pollutant discharges to waters. In Washington, the National Pollutant Discharge Elimination System (NPDES) program is administered by the USEPA for federally owned facilities and tribal lands, while the USEPA has delegated authority to issue other NPDES permits to the Department of Ecology. The NPDES program provides two levels of control for the protection of water quality: technology-based limits and water quality-based limits. Technology-based limits are based on the ability of dischargers to treat the water, while water quality-based limits are required if technology-based limits are not sufficient to protect the water body.

The federal CWA prohibits discharges of stormwater from construction projects unless the discharge is in compliance with a NPDES permit. The General Permit for Storm Water Discharges from Construction is applicable to construction disturbance areas of 1 acre or more and requires development of appropriate documents detailing storm water control measures. These documents include a notice of intent, risk assessment, site map, Stormwater Pollution Protection Plan (SWPPP), and a signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The General Permit for Construction specifies minimum BMP requirements for storm water control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

*CWA Section 404*

Under Section 404 of the CWA, proposed discharges of dredged or fill material into waters of the United States require USACE authorization. Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands). The USACE identifies wetlands using a multi-parameter approach, which requires positive wetland indicators in three distinct environmental categories: hydrology, soils, and vegetation. According to the *Corps of Engineers Wetlands Delineation Manual* (USACE 1987), except in certain situations, all three parameters must be satisfied for an area to be considered a jurisdictional wetland. When an application for a Section 404 permit is made, the Applicant must show it has:

- Taken steps to avoid impacts to wetlands or waters of the U.S. where practicable;
- Minimized unavoidable impacts on waters of the U.S. and wetlands; and

- Provided mitigation for unavoidable impacts.

### 1.7.2 State and Local

Water Quality Standards for Surface Waters of the State of Washington

All marine surface waters of the State of Washington, including Elliott Bay and the greater Puget Sound, have been assigned specific uses for protection under WAC 173-201 based on aquatic life uses (i.e., capability to support or impede spawning, rearing, and migration of various fish and shellfish species), shellfish harvesting, recreational uses (i.e., body contact), and miscellaneous classifications related to habitat, fishery harvesting, navigation, boating, and aesthetics.

**Table 3.7-1. State of Washington Marine Surface Water Uses**

| Classification | Defining Criteria |
|---|---|
| **Aquatic Life Uses** | |
| Extraordinary Quality | Highest 1-Day Maximum Temperature: 13°C (55.4°F)<br>Minimum 1-Day Dissolved Oxygen: 7.0 mg/L<br>Turbidity must not exceed:<br>5 NTUs over background when the background is 50 NTU or less; or<br>A 10 percent increase in turbidity when the background turbidity is more than 5<br>pH: Must be within a range of 7.0 to 8.5 with a human-caused variation within above range of less than 0.2 units |
| Excellent Quality | Highest 1-Day Maximum Temperature: 16°C (60.8°F)<br>Minimum 1-Day Dissolved Oxygen: 6.0 (mg/L)<br>Turbidity: Same as above.<br>pH: Must be within a range of 7.0 to 8.5 with a human-caused variation within above range of less than 0.5 units |
| Good Quality | Highest 1-Day Maximum Temperature: 19°C (66.2°F)<br>Minimum 1-Day Dissolved Oxygen: 5.0 (mg/L)<br>Turbidity: Must not exceed:<br>10 NTU over background when the background is 50 NTU or less: or<br>A 20 percent increase in turbidity when the background turbidity is more than 50 NTU<br>pH: Must be within a range of 7.0 to 8.5 with a human-caused variation within above range of less than 0.5 units |
| Fair Quality | Highest 1-Day Maximum Temperature: 22°C (71.6°F)<br>Minimum 1-Day Dissolved Oxygen: 4.0 (mg/L)<br>Turbidity: Same as above for good quality.<br>pH: Must be within a range of 6.5 to 9.0 with a human-caused variation within above range of less than 0.5 units |
| **Recreational Use** | Body contact (i.e., swimming) is the primary recreational use of a marine water. Waters are classified based on levels of toxic, radioactive, and deleterious materials as well as presence of bacteria including Enterococci and fecal coliform. |
| **Harvesting** | Appropriateness for safe harvesting of salmonid and other fish and crustacean and other shellfish (crabs, shrimp, scallops, etc.). |

**Notes:**
NTU – nephelometric turbidity units
mg/L – milligrams per liter
Source: WAC 173-201A-210; WAC 173-201A-610 and 173-201A-612.

Washington Water Pollution Control Act

The Washington Water Pollution Control Act is the State's regulatory vehicle for implementing Section 401 of the CWA and provides the State the authority to approve, condition, or deny proposed projects within waters of the State and / or U.S.

Washington Model Toxics Control Act

The Model Toxics Control Act (MTCA) establishes requirements for the cleanup of soils and groundwater at contaminated sites as implemented by the Department of Ecology's Toxics Cleanup Program. Cleanup actions conducted under the MTCA are funded by taxes, costs paid by liable parties, penalties, and legislative fund transfers. Actions may include upland soil, groundwater, or sediment cleanups in freshwater or marine environments.

## 1.8 Physical Environment

### 1.8.1 Federal

Uniform Facilities Criteria

The Department of Defense's Unified Facilities Criteria (UFC) provide technical guidance for the earthquake-resistant of new buildings and nonstructural systems and components in those buildings adapted from the International Building Code (Department of Defense [DoD] 2019). The UFC specifies such design criteria as site-specific structural loads based on local seismic ground motion parameters.

### 1.8.2 State and Local

All Hazard Mitigation Plan

The *City of Seattle All-Hazards Mitigation Plan* is the guiding document for the City's hazard mitigation program. The plan identifies the hazards including geophysical, biological, transportation and infrastructure, weather and climate hazards, of which the City is at risk and identifies a comprehensive strategy for minimizing potential losses and maximizing opportunity to increase the community's resiliency.

Seattle Hazard Identification and Vulnerability Analysis

The *Seattle Hazard Identification and Vulnerability Analysis* identifies Seattle's hazards and examines their consequences This document is the foundation for the City of Seattle's disaster planning and preparedness activities. It is updated as necessary with a major review occurring at least every four years.

Seattle Building Codes

The *Seattle Building Code* provides minimum requirements for design and construction of new buildings. Seattle has adopted the *2015 International Building Code* and added amendments

including building construction standards to ensure that future construction in the City withstands – to the maximum extent possible – geophysical hazards present in the area.

Seattle Municipal Code

Chapter 25.09 of the *Seattle Municipal Code* provides regulations to guide the development and ensure safe, stable, and compatible development in identified *environmentally critical areas*. *Environmentally critical areas* include areas identified as geologic hazard areas, liquefaction-prone areas, landslide-prone areas, steep slope erosion hazard areas, and seismic hazard areas (i.e., areas that may experience seismic shaking or tsunamis) and identifies development regulations specific to each hazard type.

## 1.9 Hazardous Materials and Wastes

### 1.9.1 Federal

Federal agencies that regulate hazardous materials include the USEPA, U.S. Department of Labor Occupational Safety and Health Administration, and the U.S. Department of Transportation (USDOT). Applicable Federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the CFR. In particular, Title 49 of the CFR governs the transport of hazardous materials, and 42 USC Chapter 82 governs solid waste disposal and resource recovery. Some of the major Federal laws include the following:

- Resource Conservation and Recovery Act of 1976 (RCRA);
- Emergency Prevention and Community Right to Know Act of 1986 (EPCRA);
- Toxic Substances Control Act of 1976 (TSCA);
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA);
- Clean Water Act of 1977 (CWA);
- Clean Air Act of 1963 (CAA);
- Asbestos Hazard Emergency Response Act of 1986 (AHERA);
- Hazardous Materials Transportation Action of 1975;
- Federal Insecticide, Fungicide, and Rodenticide Act of 1947;
- National Emission Standard for Hazardous Air Pollutants (NESHAP) – 40 CFR 61 Subpart M;
- Process Safety Management of Highly Hazardous Chemicals (29 CFR §1910.119) and Hazardous Waste Operations and Emergency Response (29 CFR §1910.120); and
- Residential Lead-Based Paint Hazard Reduction Act (1992), also known as Title X.

### 1.9.2 State and Local

Washington Model Toxics Control Act

The MTCA (WAC Chapter 173-340) is the State of Washington's environmental cleanup law which funds and directs the investigation, cleanup, and prevention of sites that are contaminated by hazardous substances. MTCA develops cleanup standards for contaminated groundwater, surface water, soil, and air. MTCA defines a two-step approach for developing requirements for cleaning up contaminated sites:

- **Establishing Cleanup Standards.** The standards provide a uniform, statewide approach to cleanup that can be applied on a site-by-site basis. The two primary components of the standards, cleanup levels and points of compliance, must be established for each site. Cleanup levels determine at what level a particular hazardous substance does not threaten human health or the environment. Points of compliance designate the location on the site where the cleanup levels must be met.
- **Selecting Cleanup Actions.** This step involves evaluating methods that could be used to clean a site and then deciding which of those methods would best achieve cleanup standards. When more than one method of cleanup is used at a site, it may be necessary to establish "remediation levels" to indicate what concentrations of contaminants will be handled using the different cleanup methods. Aside from meeting the cleanup standards, the cleanup actions must also comply with applicable Federal and state laws, protect human health and the environment, provide for compliance monitoring to ensure effectiveness, provide for permanent cleanup to the maximum extent practicable, provide for a reasonable restoration time frame, and consider public concerns. When it is not practicable to restore a site to the cleanup standards, the regulation allows use of engineered containment systems to seal off contamination on the site in some circumstances, provided it can be shown that the cleanup will still be protective of human health and the environment.

Washington Sediment Management Standards

WAC Chapter 173-204 provides sediment management standards intended to reduce and ultimately eliminate adverse effects on biological resources and significant health threats to humans from surface sediment contamination by: establishing standards for the quality of surface sediments; applying these standards as the basis for management and reduction of pollutant discharges; and providing a management and decision process for the cleanup of contaminated sediments.

Underground Storage Tank Regulations

WAC Chapter 173-360A establishes a statewide underground storage tank program that is intended, at a minimum, to meet the legislature's intent to:

- Address the serious threat to human health and the environment posed by leaking underground storage tanks containing petroleum and other regulated substances;
- Meet the requirements for delegation of the federal underground storage tank program of RCRA ;
- Be consistent with and no less stringent than the requirements in the Federal regulations and the Underground Storage Tank Compliance Act of 2005 (42 USC §§15801 et seq., Energy Policy Act of 2005, Public Law 109-58, Title XV, Subtitle B); and
- Allow for the establishment of local requirements more stringent than the statewide requirements to protect environmentally sensitive areas.

WAC Chapter 173-340-450 governs the special cleanup requirements for leaking underground tanks.

Facility Oil Handling Standards

WAC Chapter 173-180 establishes minimum standards for safe oil transfer operations to meet a zero-spill goal. Standards outlined in this chapter outline general requirements, oil transfer requirements, and design and operation standards for oil handing facilities. The chapter also facilitates coordination of local, state, regional, tribal, and other prevention and contingency plans.

Hazardous Waste Management Act

WAC Chapter 173-303 sets regulations and standards for the safe management of dangerous wastes. The purposes of these regulations are to:

- Designate solid wastes which are hazardous to public health or the environment;
- Provide for the surveillance and monitoring of hazardous wastes until they are neutralized or disposed of safely;
- Establish design, operation, and monitoring requirements for dangerous and extremely hazardous waste transfer, treatment, storage, and disposal facilities;
- Establish design, operation, and monitoring requirements for managing the state's extremely hazardous waste disposal facilities;
- Establish and administer a program for permitting dangerous and extremely hazardous waste management facilities; and
- Encourage recycling, reuse, reclamation, and recovery to the maximum extent possible.

Base Seattle Hazardous Waste Management Model

Hazardous materials and wastes at Base Seattle are managed under the Hazardous Waste Management Model (Commandant Instruction [COMDTINST] M16478.1B), internally known as the "Red Book." This manual is a compilation of standard operating procedures for employees handling hazardous materials and waste, asbestos, polychlorinated biphenyls, fuel tanks, lead, and biohazardous waste. The manual outlines requirements for the management of hazardous waste at Coast Guard facilities, including record keeping, sampling and analysis practices, training, and specific procedures for preparing for and responding to inadvertent releases of hazardous materials.

Base Seattle Spill Prevention, Control, and Countermeasures Plan

Base Seattle has prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 because Base Seattle meets the following criteria:

- It has an aggregate aboveground storage capacity greater than 1,320 gallons; and
- There is a reasonable expectation of a discharge into or upon navigable waters of the U.S. or adjoining shorelines.

The SPCC Plan and its implementation is designed to complement and meet requirements of existing laws, regulations, rules, standards, policies and procedures pertaining to safety standards, fire prevention and pollution prevention rules, including 40 CFR Part 112.7, the Washington State Facility Oil Handling Standards specified in WAC Chapter 173-180, and the Coast Guard guidelines.

The SPCC Plan forms a comprehensive balanced spill prevention program that minimizes the potential for oil discharges from occurring and provides a responsive action to mitigate the impacts of any discharge in the event of a spill. The SPCC Plan is also used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response (Coast Guard 2018a).

Base Seattle Hazardous Waste Management Plan

The Hazardous Waste Management Plan establishes procedures for all activities occurring within the fence line of Coast Guard property located at Piers 36 and 37 and its tenant commands to ensure the proper disposition of hazardous waste. The Hazardous Waste Management Plan is designed to meet all applicable Federal and state regulations pertaining to hazardous waste management at Base Seattle.

Base Seattle Integrated Emergency Response Plan

The Integrated Emergency Response Plan a site-specific document that describes emergency prevention, preparedness, and response actions for oil and hazardous substance releases. The

Integrated Emergency Response Plan contains a list of chemicals in use at Base Seattle, including the locations of hazardous material storage equipment and spill response resources. For example, each fuel, oil, or hazardous material storage location is equipped with spill containment equipment and nearby fire alarms or telephones for emergency notification. Spill kit equipment located near each tank includes sorbent booms, pads, and absorbent. The Integrated Emergency Response Plan is regularly submitted to the City of Seattle and King County Office of Emergency Management.

## 1.10 Socioeconomics and Environmental Justice

### 1.10.1 Federal

Executive Order 12898

In addition to overarching socioeconomic considerations (e.g., population, income, etc.), in 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,* was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed.

Executive Order 13045

To supplement and complement EO 12898, and because children may suffer disproportionately from environmental health and safety risks, EO 13045*, Protection of Children From Environmental Health and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies' policies, programs, activities, and standards address environmental health risks and safety risk to children.

Executive Order 13990

Section 5 of EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, requires the Federal government to estimate the social costs of carbon. This section of the EO calls for all Federal agencies to capture the full costs of GHG emissions, incorporating the societal impacts of changes in carbon dioxide and other GHG emissions into benefit-cost analyses of Proposed Actions that would have small or marginal impacts on global emissions. (Analysis of this issue area in the PEIS will be based on evaluations in *Air Quality* and *Transportation*.)

### 1.10.2 State and Local

Washington Healthy Environment for All Act

In 2021, the Washington State Legislature passed the Healthy Environment for All Act (the HEAL Act), Senate Bill 5141. This environmental justice law focuses on communities most affected by pollution as Washington transitions to a green economy. The HEAL Act created two entities: the Environmental Justice Council and the Interagency Working Group; early stages of implementation will include the hiring of Environmental Justice Council members at agencies statewide (e.g., the Department of Ecology) to ensure programs are tracked and enforced. The Act defines environmental justice in state law, outlines how agencies should consider community needs and environmental justice in their work, establishes a permanent Environmental Justice Council to work with these agencies toward the creation of effective legislation, and expands equitable community participation.

King County Comprehensive Plan

The County's Comprehensive Plan was most recently updated in July 2020, and the Plan went into effect on August 20, 2020. The Plan addresses equity and social justice, with policies intended to shape County actions as well as environmental protection policies such that they serve the expanding population of the County to equitably serve communities. The County's policies related to environmental justice include measures addressing public facilities, placing an emphasis on the need to site public facilities equitably such that no racial, cultural, or socioeconomic group is unduly impacted by siting or expansion. Siting of development will consider equity, environmental justice, and environmental, economic, technical, and service area factors. Communities with a disproportionate share of existing facilities in the County should be actively engaged in the planning and siting process for new facilities (King County 2020).

City of Seattle Comprehensive Plan

The City's Comprehensive Plan provides goals and policies for development through 2025 to achieve an equitable and sustainable city. The Comprehensive Plan includes a Growth and Equity Analysis of 2016, which informs officials and the public on potential future displacement impacts of the City's Growth Strategy and identifies mitigations to address potential impacts to marginalized populations through 2035. The Plan acknowledges marginalized populations are more likely to live close to pollution sources due to the variations in rent prices across City neighborhoods, with costs being disproportionately lower near industrial uses associated with pollution. The following goal and policies are included in the Plan and are intended to address existing inequalities regarding the environmental burden of pollution exposure as well as neighborhood policies for the Greater Duwamish Manufacturing/Industrial Center:

- **Goal EN G5,** seeks to ensure environmental benefits driven by the Comprehensive Plan are equitably distributed and environmental burdens are minimized and shared equitably by community members.

- **Policy EN 5.2,** prioritizes investments, policies, and programs that address existing disparities in the distribution of environmental burdens and benefits.
- **Policy EN 5.3,** prioritizes strategies with co-benefits that support other equity goals (e.g., promoting living wage jobs, enhancing social connectedness).
- **Policy GD-P6,** strives to separate areas that emphasize industrial activities from those that attract the general public.
- **Policy GD-P11,** strives to maintain sufficient capacity in the shoreline areas for anticipated water-dependent industrial uses.

## 1.11 Utilities and Public Services

### 1.11.1 Federal

No existing Federal regulations pertain to utilities or public services.

### 1.11.2 State and Local

Washington Growth Management Act

The Washington Legislature enacted the GMA. Under the GMA, cities and counties each are required to prepare Capital Facilities Plan, which includes an inventory of existing facilities showing locations and capacities, forecasts of future needs, proposed locations and capacities of new or expanded facilities, and a financing strategy (RCW Chapter 36.70A.070[3]) and a Utilities Element which describe existing and proposed locations of all utilities and their capacities (RCW Chapter 36.70A.070[4]). However, as a federally owned property, local planning documents regarding utilities or public services do not apply to the Base.

# Appendix G:

# Coastal Zone Management Act

# Consistency Determination

# COASTAL ZONE MANAGEMENT ACT CONSISTENCY DETERMINATION

**Submitted by the U.S. Coast Guard**

**For Actions Related to the**

## Expansion and Modernization of Base Seattle
## City of Seattle, Washington

**October 2022**

# 1. Introduction and Project Description

**Introduction**

The Coastal Zone Management Act (CZMA) of 1972, as amended, directs coastal states to identify key resources and develop policies to manage their coastal areas. The CZMA further requires Federal agencies to carry out their activities in a manner consistent to the maximum extent practicable with enforceable policies of approved state Coastal Zone Management (CZM) Programs (15 Code of Federal Regulations [CFR] 930.30). The Shoreline Management Act of 1972 (SMA; RCW 90.58) is the basis of Washington's CZM Program. Local governments have primary responsibility for the implementation of the SMA.

Although 15 CFR §923.33(a) specifically excludes lands owned or leased by the federal government from the coastal zone, part (b) of this section obligates Federal agencies to comply with consistency provisions:

> *"The exclusion of Federal lands does not remove Federal agencies from the obligation of complying with the consistency provisions of section 307 of the Act when Federal actions on these excluded lands have spillover impacts that affect any land or water use or natural resource of the coastal zone within the purview of a state's management program."*

The Coast Guard has determined that the proposed Expansion and Modernization of Base Seattle Project (Project) would have "spillover" effects on adjacent land uses. Because the effects of the project will extend beyond Federal Government property to the coastal zone, a determination of consistency with the Washington CZM Program is required. The coastal zone affected is governed by the City of Seattle Shoreline Master Program (SMP), which was updated in 2021. This determination of consistency with the Washington CZM Program is based on review of applicable sections of the State of Washington SMA and policies and standards of the City of Seattle SMP. The modernization efforts are activities undertaken by a Federal agency; the following constitutes a Federal consistency determination with the enforceable policies of the Washington CZM Program.

**Project Description**

The Coast Guard proposes to implement improvements to facilities and infrastructure at Base Seattle and acquire adjacent property in order to address these current deficiencies associated with age, general deterioration, and inadequacy to support modern Coast Guard mission execution. In addition, improve resiliency for earthquakes and other natural disasters; strengthen physical security; and ensure Base Seattle has adequate and appropriate facilities to support continued and future homeporting of Coast Guard vessels. Physical improvements are required to ensure that Base Seattle can provide a full range of mission and personnel support, as the main mission support unit for the District 13 and Polar areas of operation (AOR) now and moving forward.

Base Seattle is the largest Coast Guard installation in the Pacific Northwest and is essential to support Coast Guard missions in the Pacific Northwest and Polar regions, now and for the foreseeable future. Nevertheless, the Base is currently size-constrained and unable to meet its programmed mission and Unified Facilities Criteria (UFC), which provide planning, design, construction, sustainment, restoration, and modernization criteria requirements. The Project is required to address substantial existing deficiencies with facilities and infrastructure at Base Seattle that hamper the efficient execution of Coast Guard missions. The Project would provide facility enhancements necessary to support current and future major cutters homeported at Base Seattle. Replacement of legacy ice breaker and other major cutters homeported at Base Seattle with modern major cutters would require infrastructure enhancements and renovations. These enhancements and renovations would serve to accommodate the enhanced size and shore-side utilities support requirements associated with these advance operating assets. The Coast Guard has identified deficiencies that include, but are not limited to, resolving incompatible land uses, increasing berthing capacity, upgrading existing facilities and infrastructure, reducing congestion and parking shortfalls, providing a safer work environment, enhancing physical security capabilities, and providing new infrastructure, as necessary.

Base Seattle – federally owned land under the jurisdiction of the Coast Guard – is located south of downtown Seattle

on a highly constrained site with little room for growth or expansion (see Figure 1). The Base is bounded by the Duwamish Waterway to the west and properties owned primarily by the Port of Seattle, including Terminal 46 to the north, Terminal 30 to the south, and the Belknap and Maritime Institute of Technology and Graduate Studies (MITAGS) properties, both Port-owned, immediately to the east (see Figure 2). The Northwest Seaport Alliance manages marine cargo-related properties for the Port of Seattle, including Terminals 46 and 30. The Coast Guard currently leases the Belknap property from the Port to help meet existing parking shortfalls. BNSF Railway owns a small rail spur located between the Belknap and MITAGS properties. The State of Washington owns most submerged lands in the Puget Sound area, including the Duwamish Waterway. Jack Perry Memorial Park, a 1-acre park with 120 linear feet of public shoreline access, is located directly south of Base Seattle.

The Project would include acquisition of 26 to 53 acres of Terminal 46 and the currently leased 1.1-acre Belknap Property and would include infrastructure improvements with both the existing Base and the acquired properties (see Figure 3).

The Coast Guard has identified requirements to modernize and enhance existing facilities and infrastructure at Base Seattle. These requirements include resolving incompatible land uses, increasing berthing capacity, upgrading existing facilities and infrastructure, reducing congestion and parking shortfalls, providing a safer work environment, enhancing physical security capabilities, and providing new infrastructure, as necessary. To that end, improvements to acquire land, demolish existing structures and construct new structures, expand and upgrade infrastructure, and meet safety/building codes necessary to support Coast Guard missions and associated personnel at Base Seattle have been developed. The Coast Guard is proposing to implement the modernization of the Base over an approximate 12-year period. The proposed modernization would begin with land acquisition, then followed by phased infrastructure improvements, which would include renovation, demolition, and construction activities.

Specific building locations, infrastructure improvements, functional configurations, and real estate transactions were specifically developed to account for land use, environmental hazards, and operational considerations. Construction, renovation, and upgrade of facilities and infrastructure would be accomplished in accordance with Coast Guard standards for new buildings.

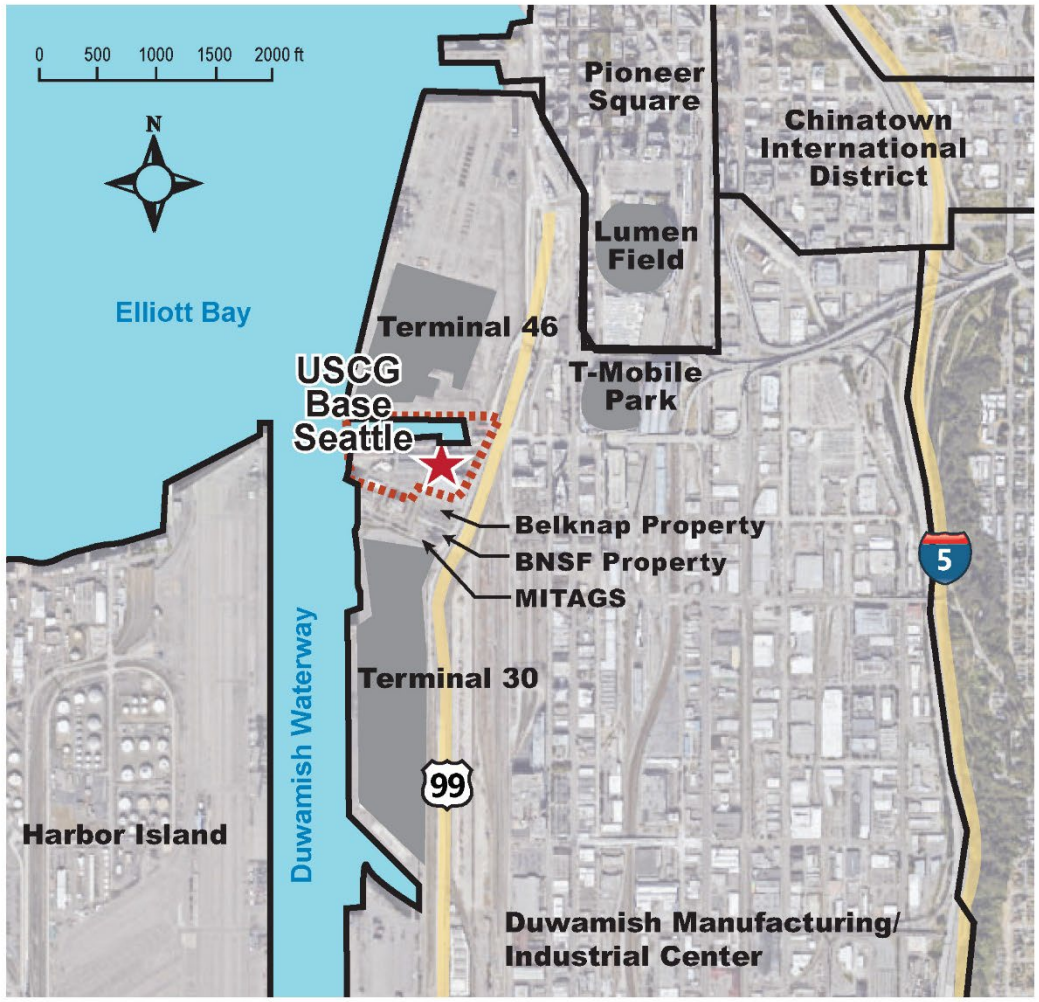
Project implementation would center around the acquisition of land on Terminal 46, including onshore development and access to two existing berth spaces. While additional work would occur on the existing Base property, the Project would provide a single, large piece of property that would enable efficient expansion of Base facilities while providing the effective Anti-Terrorism/Force Protection (AT/FP) setbacks. The acquisition of two existing, structurally adequate berths would be the most cost-effective and efficient action and would reduce potential effects by eliminating the need to construct new berths. Elements of the Project are presented below.

**Land Acquisition.** Approximately 27 to 54 acres of land would be acquired, including the following.

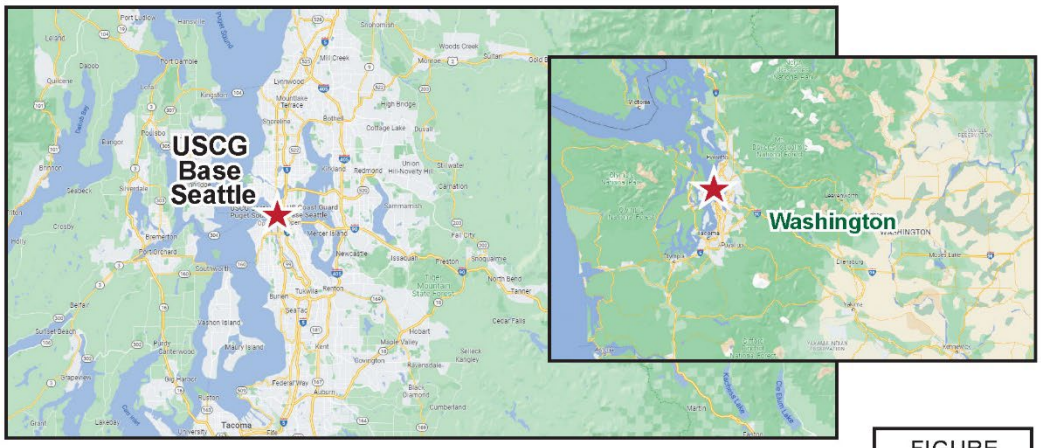
- Belknap property from the Port of Seattle – 1.1 acres
- Terminal 46 from the Port of Seattle – between 26 and 53 acres

Acquisition of these properties would provide a homogenous property boundary for efficient use, development, and improvement of Base facilities. Acquisition of land at Terminal 46 would also include two berths that provide adequate berthing and water depth for mooring of future major cutters. Acquisition would ensure that ingress/egress to the Port-retained portion of Terminal 46, near the northeast corner of Base Seattle, would remain.

**Figure 1. Base Seattle Location Map**



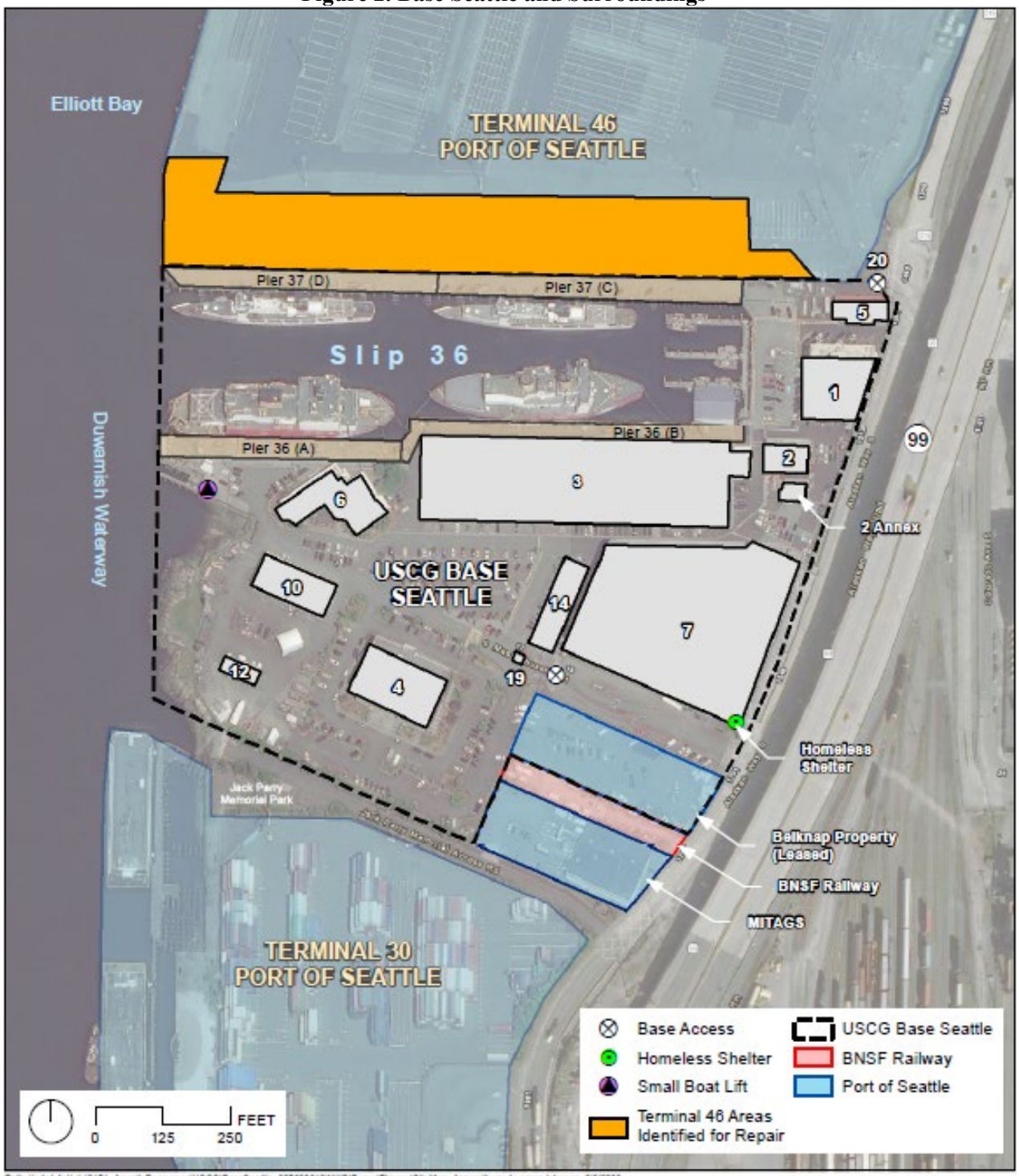

*Source: City of Seattle 2020*




**Base Seattle Location Map**

FIGURE 1

**Figure 2. Base Seattle and Surroundings**



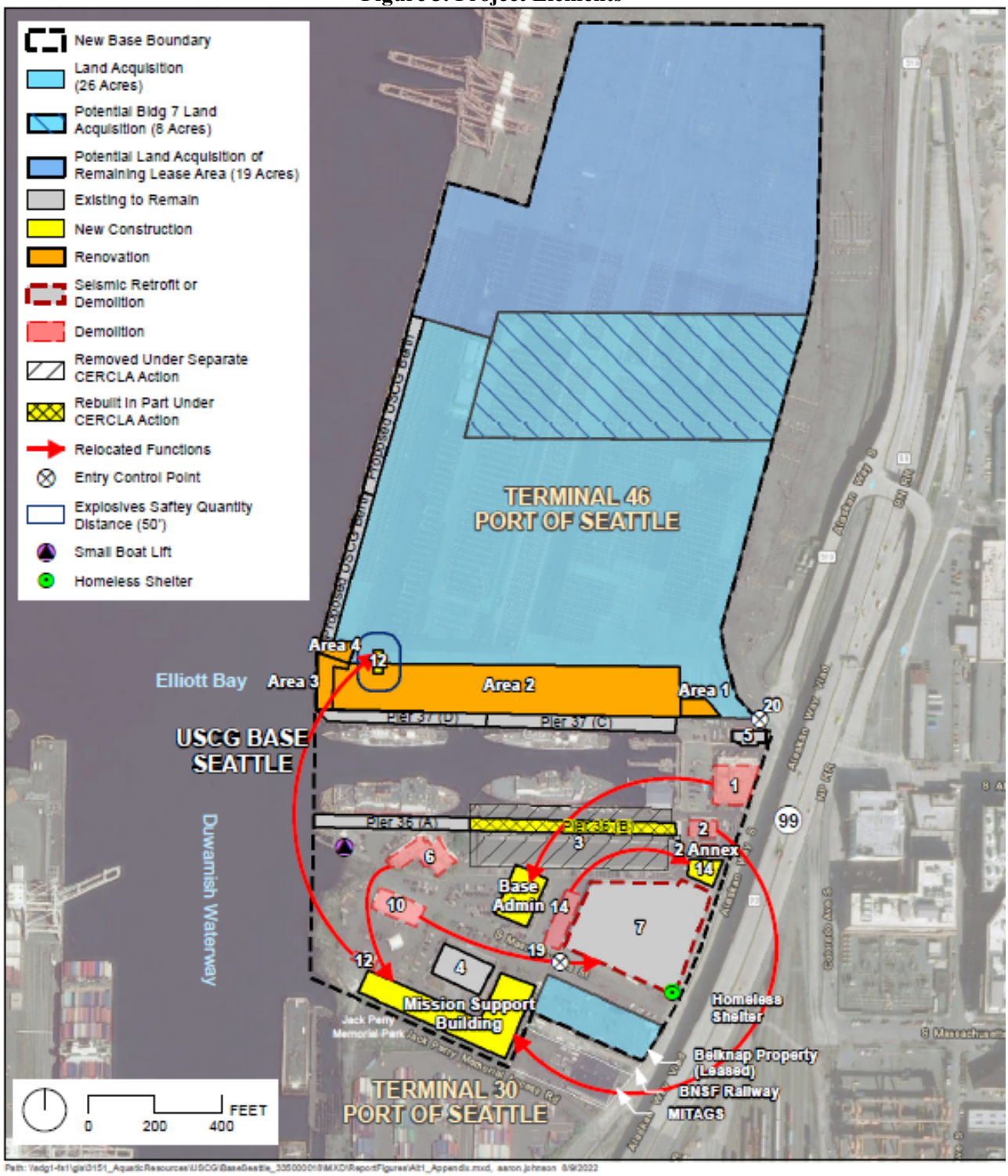

**Existing Facilities**

1. Base Admin
2. Exchange
3. Industrial Shops and Gym
4. CG Sector Puget Sound
5. Museum
6. UPH / Galley
7. Warehouse
10. ANT-Seattle shops
12. Magazine
14.Hazmat Pharmacy
19. Security Gate / Access Gate
20. Secondary Access Point

**Site Map**

FIGURE 2

**Figure 3. Project Elements**




| Existing Facilities | 3. Industrial Shops and Gym | 6. UPH / Galley | 12. Magazine |
|---|---|---|---|
| 1. Base Admin | 4. CG Sector Puget Sound | 7. Warehouse | 14.Hazmat Pharmacy |
| 2. Exchange | 5. Museum | 10. ANT-Seattle shops | 19. Security Gate / Access Gate |

20. Secondary Access Point

**Alternative 1: Modernization with Additional Land and Two Berths at Terminal 46**

FIGURE 3

**Expanded Parking and Flexible Use Space** – The project provides land acquisition for expanded parking and flexible use space. Expanded parking and associated space for vehicle circulation would address current parking deficiencies and parking requirements for daily commuting personnel, crew compliments, and Coast Guard personnel currently located off-base who would be relocated. Between one-third and one-half of acquired property would be used for parking and vehicle circulation. Flexible use space is required for vessel safety and AT/FP buffers, vessel mooring, and maintenance support, including materials storage, equipment movements, and emergency usage. Base Seattle currently lacks adequate long-term parking for personnel while deployed. This deficiency is currently addressed by use of parking at the Navy's Family Support Complex in Marysville, Washington, near Naval Station Everett, approximately 43 miles north of Seattle. Under Project implementation, parking, circulation, and flexible use space would generally be provided in expanded areas to meet these needs while reducing congestion and improving traffic and materials movement within the Base footprint. Off-Base parking at the Navy's Family Support Complex would no longer be required. Current planning for parking capacity assumes that upon program completion, two cutters will generally be deployed at any one time; parking is estimated to be available for 100 percent of personnel under a six-cutter homeport scenario and 80 percent under an eight-cutter homeport scenario.

**Demolition, Rehabilitation, and Construction** – The Project would include demolition, restoration, and construction of certain structures.

- Demolition of Buildings 1, 2, 2 Annex, 6, 10, 12 (includes Magazine), and 14. Building 7 would be demolished if it is determined that it cannot be economically retrofitted.
- Rehabilitation of the following.
  - Building 7 – Retrofitting and rehabilitation of Building 7 to meet projected mission needs, as well as current building codes and seismic standards if determined to be economically feasible.
  - Terminal 46 (Area 1) – Rehabilitation of Area 1 of Terminal 46 to meet projected mission needs, as well as current building codes and seismic standards. Pier rehabilitation would include replacement of concrete pilings, concrete decking, and associated components (e.g., bracings).
- Construction of the following.
  - Mission Support Building – a three (3)-story, approximately 136,000 square foot building to house functions currently located in Building 2, Building 2 Annex, and Building 6 (all proposed for demolition) constructed on the southern boundary of the Base;
  - Base Administration Building – an approximately 75,000 square foot building to house functions currently located in Building 1 (proposed for demolition) to be constructed south of Pier 36A/B;
  - Replacement of Buildings 10, 12, and 14 – existing Buildings 10, 12, and 14 would be demolished and reconstructed in new locations with no change in size or function; Buildings 10 and 12 would be reconstruction on Terminal 46; and
  - Building 7 on Terminal 46 if the existing Building 7 is demolished.

**Shoreside Infrastructure Repair –** The southern end of Terminal 46 is within or adjacent to operable unit (OU) 10 of the Harbor Island Superfund Site (HISS). Depending on the exact location and nature of any in-water work in this area (wharf area immediately on the north side of Slip 36; refer to Figure 3), such work may occur within OU 10 and therefore may require the work, in whole or in part, to be conducted as part of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action. Because the details of future work to this area, the extent of contamination in this area, and the potential for work to occur within OU 10 are not currently known, it is assumed for purposes of this consistency evaluation that rehabilitation of this area would not be conducted as part of a CERCLA removal action and consequently is part of the Project. Should all or part of this work be required to be conducted under CERCLA, the removal action would likely include removal of contaminated sediment, additional work to address source materials for contamination, shoreline

stabilization as contaminated sediment is removed, and, if necessary for Coast Guard use, replace/restore functional use of the pier for Coast Guard operations.

- Terminal 46 – In 2020, on behalf of the Coast Guard, Appledore Marine completed an inspection and assessment of waterfront facilities to evaluate structural conditions at the southern end of Terminal 46 (Coast Guard 2020). Appledore Marine divided the area into four distinct areas (i.e., Areas 1, 2, 3, and 4) based on vintage and material type. Appledore Marine then evaluated structure configuration, construction materials, age, and remaining service life of the four areas. All four areas of Terminal 46 are assumed to require replacement. Designs for replacement structures have not been developed so for purposes of analysis and determination it is assumed that replacement structures would be standard concrete piles, girders, beams, and decking, similar to the existing and surrounding pier structures, and with no net increase in square footage. Existing piles would be removed, including creosote timber piles in Areas 1 and 3.

**Utility Replacement, Upgrade, and Modernization** – Exiting utilities are deficient and do not meet current codes. All utilities, including communications (e.g., telephone, data, video, etc.), electrical, natural gas, sanitary sewer, potable water (including fire protection water supply), and storm sewer, would be replaced to address current deficiencies, to accommodate new development and land use patterns, and to improve reliability and resiliency. Replacing and upgrading these utilities would include excavating existing utility corridors, replacing utility lines (each estimated to average 3,500 linear feet), installing power poles, installing lift and pump stations, installing pier-side power mounds and utility vaults, extending existing utilities to relocated infrastructure and/or piers, and installing a new Base-wide Public Address system for daily operational and emergency announcements. Removing and replacing fueling systems and related storage systems would also occur. All connections would be within the expanded Base boundaries. These utility system upgrades would be designed in accordance with the land acquisition and pattern of development.

**Seismic Stabilization** – Base Seattle is located on an area of artificial fill and structurally weak soils that are susceptible to liquefaction during earthquakes. Seismic soil stabilization to ensure structural integrity and public safety would be implemented by installing stone (or aggregate) columns, vertical or horizontal grouting, or deep soil mixing with amendments. It is anticipated that installing stone columns would be the most likely method of soil stabilization at Base Seattle and would be accomplished via top-feed or bottom-feed caisson-replacement. Both methods employ installing a steel casing, filling the casing with aggregate material and securing that material with compaction (National Highway Institute 2017). It is anticipated that installation of as many 1,000 stone columns would be installed within the current Base boundaries and any acquired land. Each column would be approximately 100 feet deep, 3 feet in diameter, and spaced 6 feet on center (i.e., separated by 3 feet). It is assumed the columns would likely be installed in a grid pattern set back by 10 or more feet from sheet pile walls; however, specific locations would be based on geotechnical analysis and infrastructure design development.

**Upgrades to Base Security** – The Coast Guard would install security fencing around the Base. The main entrance gate would remain in place but be upgraded to meet current standards and AT/FP requirements, including security barriers, sensors, and overhead lighting. A secondary gate at the northeastern corner of the Base, west of the intersection between Alaskan Way S and S. Atlantic Street, is currently used as needed for truck traffic and materials delivery. The Coast Guard would upgrade this gate. Further, the gate would be available to Base commuters during a.m. hours and to truck traffic throughout the day. The Coast Guard would develop an associated gatehouse within Base boundaries to prevent queuing off base. The gate house would meet current standards and AT/FP requirements.

**Repair of Internal Road Surfaces, Hardscaping, and Landscaping** – The Coast Guard would replace or repair all internal roads and hardscape features (e.g., curbing, sidewalks) and landscaped areas would be replaced or repaired following execution of various actions such as building construction or utility replacement.

**Construction Phasing and Execution** – Conceptual construction sequencing for overall program buildout and the arrival of major cutters and personnel, is presented in Figure 4. The timing for execution of these program elements

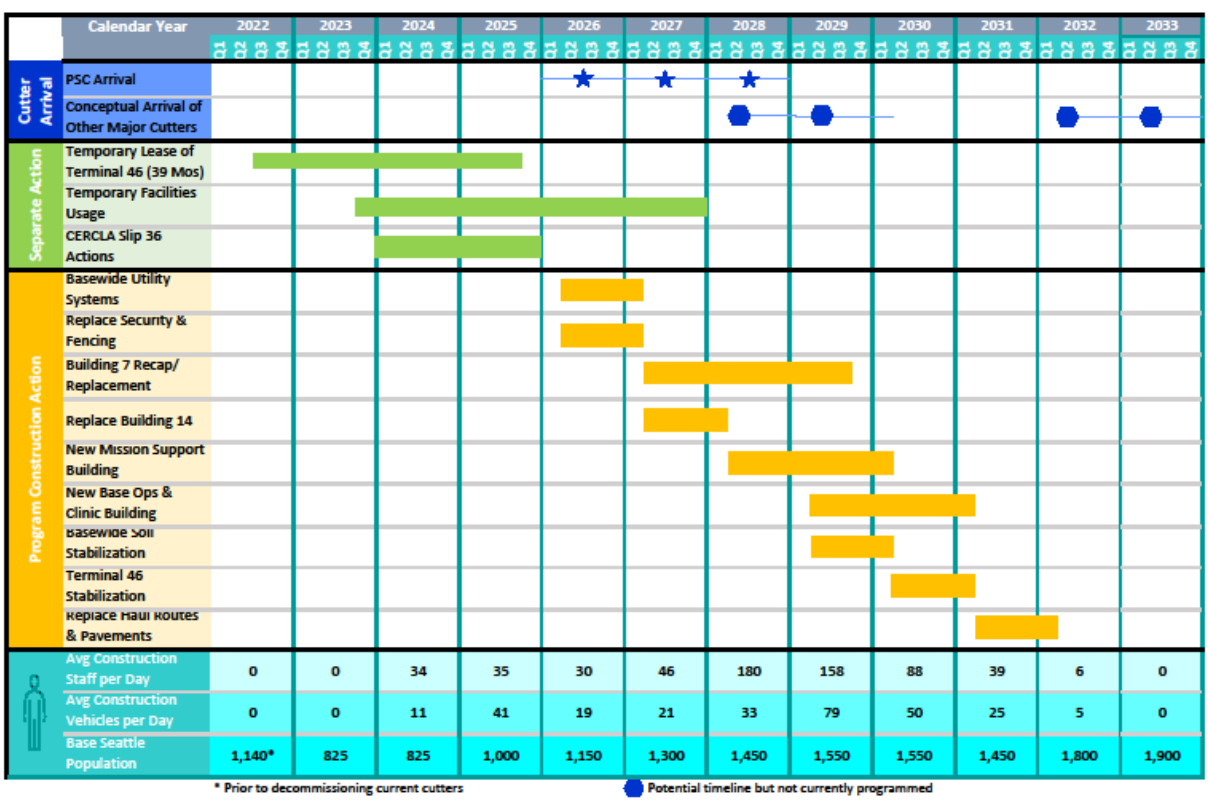
is based on current Coast Guard planning and operational needs. These timeframes may change based on factors such as funding and evolving Federal government priorities. As such, it is possible that the schedule identified for some of these projects could shift over the course of the program. This may result in a shift in the estimated maximum period of work, or an extension of the work over a longer period of time, the latter which would reduce the intensity of construction activities. These timelines provide the framework for the analysis and reflect a potential maximum intensity of activity on Base.

It is assumed that all construction and site development activities would include use of standard construction processes (i.e., demolition, materials delivery, concrete placement) and equipment (i.e., trucks, backhoes, cranes, power tools).

**Sustainability** – In accordance with applicable laws and regulations, Coast Guard policy (Coast Guard 2014) and Coast Guard guidance (Coast Guard 2020), the Coast Guard would include design elements to improve sustainability and resiliency in future construction. The Coast Guard would conduct construction in accordance with The Guiding Principles for Sustainable Federal Buildings and Associated Instructions (CEQ 2020) or applicable guidance at the time of construction. The Guiding Principles provide agencies with a means to meet statutory provisions relating to high-performance sustainable buildings. The Guiding Principles ensure Federal buildings:

- Employ Integrated Design Principles
- Optimize Energy Performance
- Protect and Conserve Water
- Enhance the Indoor Environment
- Reduce the Environmental Impact of Materials
- Assess and Consider Building Resilience

**Figure 4. Conceptual Construction and Staffing Sequencing.**



Because the Coast Guard is only in the programmatic level of planning for modernization of Base Seattle, it has not initiated detailed design for any future construction projects. Future planning and designs may consider a wide range of design features. These features include on-site renewable power generation (e.g., photovoltaic [PV]), electrical vehicle charging infrastructure integrated with PV carports and battery storage, and other energy and water conservation controls and measures.

As an agency charged with public safety and law enforcement missions, it is essential that Base Seattle remain operational during system outages or natural disasters. The Federal Sustainability Plan and the Department of Homeland Security (DHS) Resilience Framework (DHS 2018) dictate that Coast Guard consider design features to ensure continuity of operations during system outages or natural disasters. Examples of design considerations include seismic hardening of mission critical facilities, off-grid power generation and storage (e.g., micro-grid technology), and elevation of critical infrastructure and utility components to combat risk of flooding.

**Permit Conditions and Control Measures** – All construction and site development activities would be completed in compliance with all design standards and with any required permits or approvals issued for site-specific work. The Coast Guard would require, as standard conditions of all Coast Guard construction contracts, that all construction contractors implement Best Management Practices (BMPs) or other control measures during construction.

A Stormwater Pollution Prevention Plan (SWPPP) will be prepared by or on behalf of the Coast Guard and implemented by the construction contractor. The plan will be kept on-site and will be updated by the construction contractor, as needed. The construction contractor must comply with all conditions of the U.S. Environmental Protection Agency's (USEPA's) Construction General Permit. Areas of disturbance or stockpiling will be stabilized with erosion control devices to ensure that sediment from construction is prevented from entering adjacent waters. Staging areas and work areas will incorporate appropriate BMPs to minimize the potential for hydrocarbon or chemical contamination of site soils and water bodies. Examples of BMPs that are anticipated to be implemented are silt fencing and oil absorbing pads beneath equipment during non-use and daily inspections of leakage from equipment. The construction contractor will add BMPs as necessary during construction to ensure permit conditions are met. Sediment and erosion control measures will be maintained and be renewed until permanent vegetation and storm runoff control measures are effective. A Notice of Termination will be completed in compliance with the National Pollutant Discharge Elimination System (NPDES) permit when site conditions are permanently restored and stabilized, estimated to occur one (1) year after construction.

Prior to Project implementation, the Coast Guard will prepare and submit a Clean Water Act (CWA) Section 404 (b) (1) evaluation to assess the potential water quality impacts of the Project. The Coast Guard will also prepare a Water Quality Certification request under CWA Section 401.

The Coast Guard has prepared a draft Programmatic Environmental Impact Statement (PEIS) that evaluates the effects of Project implementation under the National Environmental Policy Act (NEPA). The PEIS determines the significance of Project impacts to the human environment. The PEIS applied screening criteria to potential development scenarios and identified three alternatives that met the purpose and need of the action and were viable for implementation. Of these three, the Coast Guard identified the Project evaluated here as the Preferred Alternative that met the purpose and need and resulted in the least impact to the human and physical environment (refer to Section 2 of the PEIS). This evaluation is provided to the Washington Department of Ecology (Ecology) for its consideration and reference.

# 2. Jurisdiction and Consistency Requirements

The CZMA is administered by Ecology. Under Washington's program, Federal projects that would affect land use, water use, or natural resources must demonstrate consistency with the policies of five

overarching laws[1].

1. Shoreline Management Act (implemented as the City of Seattle's Shoreline Master Program [SMP])
2. Clean Water Act / Washington Water Pollution Control Act
3. Clean Air Act / Washington Clean Air Act
4. Ocean Resource Management Act
5. Marine Waters Management and Planning Act

The Project requires state concurrence with the Coast Guard findings presented in this CZMA consistency determination.

## 2.1 Shoreline Management Act (RCW 90.58)

The Washington Shoreline Management Act (Revised Code of Washington [RCW] 90.58) is the legal basis for managing the state's shorelines and waters, with jurisdiction that extends from 0 to 200 miles offshore. Shoreland jurisdiction extends landward for 200 feet as measured on a horizontal plane from the ordinary high-water (OHW) mark. It also includes floodways and contiguous floodplain areas landward 200 feet from such floodways, and all wetlands and river deltas associated with streams, lakes, and tidal waters subject to a master program.

RCW 90.58.020 defines the State's order of preference for uses and consistency – and that are deemed "enforceable" by the National Oceanic and Atmospheric Administration (NOAA) Office of Coastal Management[2] – as follows (Ecology 2020).

*(1) Recognize and protect the statewide interest over local interest;*

*(2) Preserve the natural character of the shoreline;*

*(3) Result in long-term over short-term benefit;*

*(4) Protect the resources and ecology of the shoreline;*

*(5) Increase public access to publicly owned areas of the shorelines;*

*(6) Increase recreational opportunities for the public in the shoreline;*

*(7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary.*

The provisions of SMPs, developed and implemented by local governments, apply to all shorelines of the State as defined in RCW 90.58 and Washington Administrative Code (WAC) 173 and applicable chapters of RCW 36.70. In accordance with state standards for CZMA consistency, all Federal actions must be consistent with State and local laws and regulations.

The City of Seattle SMP includes goals, policies, and regulations that govern land use and activities within the Seattle Shoreline District. That district includes the following waterbodies: the Duwamish River, the Ship Canal, Lake Union, Lake Washington, Green Lake, and Puget Sound; their associated wetlands and floodplains; and all land within 200 feet of these waterbodies (City of Seattle 2015, 2020).

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[1] Although previously required, demonstration of compliance with the Washington State Environmental Policy Act (SEPA) and review by the Energy Facilities Site Evaluation Council are no longer CZMA consistency requirements by Ecology (Ecology 2020).

[2] NOAA's Office of Coastal Management identifies an enforceable policy as "a state policy that is legally binding under state law (e.g., through constitutional provisions, laws, regulations, land use plans, ordinances, or judicial or administrative decisions), and by which a state exerts control over private and public coastal uses and resources, and which are incorporated in a state's federally approved CMP." CZMA § 304(6a) and 15 C.F.R. § 930.11(h).

Seattle's SMP is based on three policy goals:

1. **Preferred Shoreline Uses:** The SMA establishes a preference for uses that are water-oriented and appropriate for the environmental context (e.g., port facilities, shoreline recreational uses, and water-dependent businesses). Single-family residences are also identified as a priority use under the SMA when developed in a manner consistent with protection of the natural environment.
2. **Environmental Protection:** The SMA requires protections for shoreline natural resources, including *"… the land and its vegetation and wildlife, and the water of the state and their aquatic life…"* to ensure no net loss of ecological function.
3. **Public Access:** The SMA promotes public access to shorelines by mandating inclusion of a public access element in local SMPs and requiring provisions to ensure that new development maintains public access features.

## 2.2 Clean Water Act / Washington Water Pollution Control Act (RCW 90.48)

As stated above, the Base Seattle Modernization Project would be conducted adjacent to and partially within an area designated as a water of the U.S. Section 404 of the CWA of 1977, as amended, requires evaluation of all projects involving the discharge of dredged or fill material into waters of the U.S. for water quality and other effects prior to making the discharge.

The Water Pollution Control Act outlines the public policy of the state of Washington to maintain the highest possible standards to ensure the purity of all waters of the state are consistent with public health and public enjoyment thereof. Additionally, it outlines the propagation and protection of wildlife, birds, game, fish, and other aquatic life, and the industrial development of the state, and require the use of all known available and reasonable methods by industries and others to prevent and control the pollution of the waters of the state of Washington. It works in concert with the Federal CWA to ensure that waters of the U.S. and Washington State are protected.

The Coast Guard would obtain a CWA Section 404(b)1 permit and Section 401 Water Quality Certification prior to any work potentially affecting water quality. In addition, the Coast Guard would comply with Section 402 of the CWA by seeking coverage under a NPDES Construction General permit from the USEPA before initiating work. This includes developing a SWPPP.

## 2.3 Clean Air Act / Washington Clean Air Act (RCW 70.94)

The federal Clean Air Act (CAA) established a comprehensive program for improving and maintaining air quality throughout the U.S. Its goals are achieved by permitting stationary sources, restricting the emission of toxic substances from stationary and mobile sources, and establishing National Ambient Air Quality Standards (NAAQS). Title 42 of the U.S. Code (USC) Section 7418 specifies that each department and agency of the Federal Government (1) having jurisdiction over any property or facility; or (2) engaged in any activity resulting, or which may result, in the discharge of air pollutants, shall be subject to, and comply with, all Federal, state, interstate, and local requirements respecting the control and abatement of air pollution in the same manner, and to the same extent as any non-governmental entity. Coast Guard activities resulting in the discharge of air pollutants must conform to NAAQS and State Implementation Plans (SIPs) unless the activity is explicitly exempted by USEPA regulations.

Ecology provides the systematic control of air pollution from air contaminant sources and for the proper development of the state's natural resources. For that responsibility, the Department has established technically feasible and reasonably attainable standards and established rules generally applicable to the control and/or prevention of the emission of air contaminants (WAC 173.400 through 173.495).

## 2.4 Ocean Resources Management Act (RCW 43.143)

The Ocean Resources Management Act (ORMA) (RCW 43.143, and WAC 173-18, 20, 22, 26, and 27) establishes policies and guidelines for state and local management authority over Washington's coastal waters, seabed, and shorelines. It supplements the Shoreline Management Act with jurisdiction that extends from the mean high tide line seaward for 200 miles in four Washington counties, not including King County or City of Seattle; therefore, the ORMA does not apply to this Project.

## 2.5 Marine Spatial Plan for Washington's Pacific Coast

The Marine Waters Management and Planning Act (RCW 43.372) provides the overall intent, purpose, principles, and elements for development of the Marine Spatial Plan (MSP) for Washington's Pacific Coast. The MSP creates a framework for integrating existing state and local authorities. It does not supersede current authority of state agencies or local governments (RCW 43.372.060). For example, local city or county SMPs are one of the many existing authorities that set forth more detailed requirements for ocean uses within local jurisdictions. Because the Act and MSP apply only to the Pacific Coast of Washington, they do not apply to this Project.

# 3. Consistency Evaluations

## 3.1 Shoreline Management Act: (RCW) 90.58

**State of Washington Shoreline Management Program**

The Washington State Department of Ecology enforces the following policies under the State Shoreline Management Act.

- WAC 173-15: Oil and Natural Gas Exploration Permits: This project does not include the exploration of oil or natural gas; and therefore, the regulation does not apply to the proposed action.
- WAC 173-18: Rivers within Shoreline jurisdiction: The project is not located at the mouth of a river; therefore, the regulation does not apply to the proposed action.
- WAC 173-20: Lakes within Shoreline jurisdiction: This project does not include shoreline adjacent to a lake; therefore, the regulation does not apply to the proposed action.
- WAC 173-22: Shorelines of the State: The project does affect a Shoreline of the State. The project is consistent to the maximum extent practicable with the local Shoreline Master Plan (SMP) requirements for the local shoreline designation. Please refer to Local Shoreline Master Program below.

The CZMA does not require Federal agencies to obtain local permits. However, for Federal consistency purposes, a Federal applicant must demonstrate consistency with the SMA and its implementing WACs. As such, Ecology advises federal applicants to rely on the local SMP because it incorporates and localizes the policies of the SMA. Ecology further advises that SMPs should be used as guidance to evaluate consistency with the enforceable policies of the SMA (Ecology 2020). To that end, the Coast Guard has demonstrated consistency to the maximum extent practicable with the Seattle SMP and all applicable policies and regulations for shorelines of the state. Further, elements of this program fall within the description of an activity exempted from the permit process as outlined in WAC 173-27-040(2)(b), "Normal maintenance or repair of existing structures." Replacement of existing structures is a common method of repair for deteriorated piles and decking. The new components are comparable to adjacent infrastructure and the development footprint remains the same as existing conditions. The replacement does not cause substantial adverse effects to shoreline resources or environment.

The Washington SMA, RCW Chapter 90.58 is the core authority of Washington's CZM Program. This

chapter enunciates the following state policy.

- To provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses.
- To ensure the development of shorelines in manner that promotes and enhances the public interest while allowing only limited reduction of rights of the public in the navigable waters.
- To protect against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights.

The proposed activities are consistent with this broad statement of policy. The proposed program encompasses improvement to an established use. The program will not impact the rights of the public in navigable waters. The project is in the public interest due to proposed upgrades to the Coast Guard facility will improve shoreside infrastructure and will not change the rights of navigation.

**Local Shoreline Master Program**

As stated above, the coastal zone affected is governed by the City of Seattle SMP, which was updated in 2021. This determination of consistency with the Washington CZM Program is based on review of applicable sections of the State of Washington SMA and policies and standards of the city of Seattle SMP. The Seattle Shoreline Master Program (SMP 2021) constitutes the policies and regulations governing development and uses in and adjacent to marine and freshwater.

Following the procedures as detailed at Seattle Municipal Code 23.60A.062, this document provides information for a determination of consistency. The following outlines pertinent sections of the City of Seattle SMP that apply to and implement the SMA. Consistency evaluations are located below the relevant code in ***bold italics***.

**23.60A.002 Title and purpose**

A. This Chapter 23.60A shall be known as the "Seattle Shoreline Master Program Regulations."

B. It is the purpose of this Chapter 23.60A to implement the policy and provisions of the Shoreline Management Act and the Shoreline Goals and Policies of the Seattle Comprehensive Plan, as well as the City's interest in the public health, safety and welfare, by regulating development, uses and shoreline modifications of the shorelines of the City in order to:

1. Protect the ecological functions of the shoreline areas;
2. Encourage water-dependent uses;
3. Provide for maximum public access to, and enjoyment of the shorelines of the City; and
4. Preserve, enhance, and increase views of the water.

***Consistent. The expansion and modernization project will not alter the ecological functions adjacent to the Base and is consistent as a water-dependent use. The project will not impede public access to shorelines or impair public views of the water.***

**23.60A.152 General development**

All developments, shoreline modifications, including land disturbing activity, and uses are subject to the following general development standards, whether they are located on dry land, overwater or in setbacks:

A. All shoreline developments, shoreline modifications, and uses shall be located, designed, constructed and managed to achieve no net loss of ecological functions. No net loss of ecological functions shall be achieved by applying the standards set out in this Chapter 23.60A, including applying mitigation sequencing pursuant to Section 23.60A.158.

***Consistent. The expansion and modernization project will maintain existing development within established locations. Rehabilitation of waterside infrastructure will be designed, constructed, and managed to achieve no net loss of ecological functions to the maximum extent practicable. Mitigation sequencing to avoid and minimize impacts using BMPs will be implemented according to Section 23.60.158 B.1.a-b.***

B. All shoreline development, shoreline modifications, and uses shall be located, designed, constructed, and managed to avoid, or if that is infeasible, to minimize to the maximum extent feasible, adverse impacts or interference with beneficial natural shoreline processes such as water circulation, littoral drift, sand movement, or erosion.

***Consistent. The expansion and modernization project will rehabilitate failing infrastructure within its existing footprint. Therefore, no changes in shoreline processes will occur upon project implementation.***

C. All shoreline developments, shoreline modifications, and uses shall be located, designed, constructed, and managed to prevent the need for shoreline defense and stabilization measures and flood protection works such as bulkheads, other bank stabilization, fills, levees, dikes, groins, jetties, dredging, or substantial site regrades to the extent feasible except as allowed in Section 23.60A.188.

***Not applicable. The expansion and modernization project does not require shoreline stabilization, only rehabilitation of existing structures.***

D. All new shoreline development and uses shall be sited and designed to avoid or, if that is infeasible, to minimize to the maximum extent feasible the need for new and maintenance dredging.

***Not applicable. Only rehabilitation of existing structures would occur; no new shoreline development would occur. The proposed rehabilitation does not require new or maintenance dredging.***

E. All shoreline developments, shoreline modifications, and uses shall be located, designed, constructed, and managed in a manner that minimizes adverse impacts to surrounding land and water uses in the Shoreline District and is compatible with the affected area in the Shoreline District.

***Consistent. The proposed shoreline modifications of the project will minimize adverse impacts to surrounding land or water uses. The purpose of the proposed shoreline modifications is to rehabilitate failing infrastructure. Modification actions will employ the use of BMPs to minimize any adverse impacts. The Coast Guard will coordinate rehabilitation efforts with Notices to Mariners and to the public as applicable where appropriate.***

F. All shoreline developments, shoreline modifications, and uses shall be located, constructed, operated, and managed to protect public health and safety.

***Consistent. The proposed rehabilitation is designed to address structural concerns of the shoreside infrastructure, specifically piles and decking. The proposed project is designed to remedy ongoing public health and safety concerns and to minimize any future effects to public health and safety to the maximum extent practicable.***

G. Disturbance areas and land clearing shall be limited to the minimum necessary for development. Any surface disturbed or cleared of vegetation and not to be used for development shall be planted with native vegetation, except that pre-disturbance landscaped areas containing non-native vegetation located outside the shoreline setback may be re-landscaped using non-native, noninvasive vegetation pursuant to Section 23.60A.190.

***Not applicable. The proposed shoreline modification requires no land clearing.***

H. All shoreline developments, shoreline modifications, and uses shall use best management practices pursuant to DR 16-2009, Construction Stormwater Control Technical Requirements, to control impacts during construction.

***Consistent. The Coast Guard will ensure that its construction contractors provide appropriate stormwater management measures using appropriate BMPs.***

I. All shoreline developments, shoreline modifications, and uses shall be located, designed, constructed, operated and managed to: protect the quality and quantity of surface and ground water on and adjacent to the development lot by using best management practices as follows:

1. Keep all material on the property appropriately stored, and maintain all structures, machinery, and materials on the property to prevent the entry of debris and waste materials into any water body.
2. Pave and/or berm drum storage areas, and control fugitive dust to prevent contamination of land or water.
3. Minimize the impervious surface on the site, and use permeable surfacing where practicable, except where other required state or federal permits prohibit such actions.
4. Use other control measures as appropriate, including but not limited to bioretention, rainwater harvesting, downspout dispersion, filters, catch basins, and planted buffers.

***Consistent. Construction materials will be properly stored and secured to prevent entry of debris or waste materials into any waterbody. Secondary containment will be used, as needed, around materials and machinery. There will be no increase in impervious surfaces associated with the shoreline modification. Rehabilitation of existing decking will remain within existing decking footprints. See Attachment A for a complete list of BMPs.***

J. All in-water and over-water structures shall be designed, located, constructed, and managed to avoid adverse impacts to aquatic habitat, such as increased salmonid predator habitat and adverse impacts due to shading, to the maximum extent feasible and to limit construction to the times of the year when construction will have the least impact on migrating salmonids as set by WDFW and the U.S. Army Corps of Engineers.

***Consistent. The construction program involves replacement of existing in- and over-water infrastructure with no design changes. Rehabilitation will be limited to the extent of current development footprints, with no expansion in over-water shading or in-water structures. In-water work will take place within applicable work "windows", as coordinated with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS), to avoid impacts to migrating salmonids. Agency consultations will be conducted and completed as appropriate prior to commencement of construction actions.***

K. Durable, non-toxic components are the first priority for in-water and over-water structures and shall be used unless it is unreasonable. Treated wood and other material shall be the least toxic according to industry standards. Treated wood used shall be applied and used in accordance with the American Wood Preserver Association (AWPA) standards for aquatic use. Wood treated with pentachlorophenol, creosote, chromate copper arsenate (CCA), or comparably toxic compounds is prohibited for decking or piling.

***Consistent. Durable, industry-standard, non-toxic project materials (e.g., concrete or steel piles and decking) will be used for in-water and over-water structures. As such, the proposed project will remove and replace existing timber piles with concrete piles.***

L. Creosote piles

1. Creosote treated piles may be repaired if:
   a. the piling is under a structure that is not being replaced; or
   b. fewer than 50 percent of the existing piles are in need of repair under a structure that is being replaced.
2. "Sleeving" shall be the repair method used unless another method provides better protection of ecological functions.
3. Creosote treated piles in need of repair must be replaced if under a structure that is being replaced and 50 percent or more of the number of piles are proposed to be repaired, if reasonable.

***Consistent. Durable, industry-standard, non-toxic project materials (e.g., concrete or steel piles and decking) will be used for in-water and over-water structures. As such, the proposed project will remove and replace all existing timber piles with concrete piles.***

M. Replaced covered moorage and new and replaced boat sheds shall be designed to provide the maximum ambient light to reach the water. Designs shall:

1. Minimize sides of the structures; and
2. Provide light transmitting roofing and side material to the maximum extent feasible.

***Not applicable. The project does not involve covered moorage or boat sheds.***

N. Light transmitting features are required to be installed for all new and replaced piers and floats, over-water boat repair facilities and similar structures to the maximum extent feasible. When determining feasibility of light transmitting features for nonresidential piers and floats see subsection 23.60A.187.E.6.

***Not applicable. The project involves rehabilitation of existing decking and piles within existing development footprints. The project will not install any new piers, floats, over-water boat repair facilities, or similar structures.***

O. Tires are prohibited as part of above or below water structures or where tires could potentially come in contact with the water (e.g., floatation, fenders, hinges). During maintenance of structures using tires, existing tires shall be removed or replaced with nontoxic material.

***Not applicable. The project will not use or replace any tires.***

P. All foam material, whether used for floatation or for any other purpose, shall be encapsulated within a shell that prevents breakup or loss of the foam material into the water and that is not readily subject to damage by ultraviolet radiation or abrasion. During maintenance of structures using foam, existing un-encapsulated foam material shall be removed or replaced with material meeting the standards of this subsection 23.60A.152.P.

***Not applicable. The project will not use or replace any foam material.***

Q. Artificial night lighting shall first be avoided. If that is infeasible, lighting should minimize night light impacts on the aquatic environment by focusing the light on the pier surface, using shades that minimize illumination of the surrounding environment and using lights that minimize penetration into the water, to the maximum extent feasible, considering the activities that occur at the site at night.

***Consistent. Rehabilitation work is expected to occur during standard daylight working hours. If work occurs at night, lighting for safety of workers will be required and will be minimized to the extent feasible to conduct work safely. Directional lighting will be used to focus light on the work area and minimize illuminating surrounding areas and penetration into adjacent waterbodies as noted in BMPs.***

R. The release of oil, chemicals, solid waste, untreated effluents, or other hazardous materials onto or into the water is prohibited. Best management practices shall be employed for the safe handling of these materials to prevent them from entering the water. Equipment for the transportation, storage, handling or application of such materials shall be maintained in a safe and leak-proof condition. If there is evidence of leakage, the further use of such equipment shall be suspended until the cause has been completely corrected. Best management practices shall be employed for prompt and effective clean-up of any spills that occur. A spill prevention and response plan to meet the above requirements may be required by the Director prior to issuance of a permit unless the Director has determined that it is reasonable to provide the plan prior to commencement of construction.

***Consistent. The proposed project conforms to the above provisions. Appropriate BMPs will be implemented during the project (see Attachment A). The Coast Guard will require the construction contractor to provide a Spill Prevention and Response Plan.***

S. Facilities, equipment and established procedures for the containment, recovery and mitigation of spilled petroleum products shall be provided at recreational marinas, commercial marinas, vessel repair facilities, marine service stations and any use regularly servicing vessels that have petroleum product capacities of 10,500 gallons or more. A third party may provide the containment and clean-up of spills if a containment boom, capable of containing a spill from the largest vessel, is available on site and personnel are trained to deploy containment booms around vessels moored at the site.

***Consistent. BMPs intended to prevent and contain petroleum product spills from any vessels used in the rehabilitation (e.g., barges or work boats) will be implemented (see Attachment A).***

T. Construction and repair work shall use best management practices to prevent the entry of debris and other waste materials into any water body. No over-water or in-water application of paint, preservative treatment, or other chemical compounds is permitted, except in accordance with best management practices. Any cleaning, sanding, cutting of treated wood, or resurfacing operation occurring over-water or in-water shall employ tarpaulins securely affixed above the water line to prevent material from entering the water. Prior to removing the tarpaulins, the accumulated contents shall be removed by vacuuming or an equivalent method that prevents material from entering the water.

***Consistent. The proposed shoreline modification does not involve over-water or in-water application of paint, preservative treatment, or other chemical compounds or cleaning, sanding, or resurfacing operations on site. Should the removal of treated wood pilings require cutting, appropriate precautions will be exercised to minimize the release of any material from entering the water. Existing concrete and other materials removed during the course of the project will be disposed of properly off site.***

U. Construction staging areas shall be as far from the OHW mark as reasonable. For projects involving concrete, a concrete truck chute cleanout area shall be established to contain wet concrete. All inlets and catch basins shall be protected from fresh concrete, paving, paint stripping and other high-risk pollution generating activities during construction.

***Consistent. The Coast Guard will identify appropriate staging areas on previously developed property. The staging areas will be as far from the OHW mark as reasonable. BMPs (Attachment A) will prevent the introduction of concrete or other materials generated during the project into inlets and catch basins.***

V. If at any time project-related activities cause a fish kill, the permittee shall stop all work relating to the fish kill and immediately notify the Seattle Department of Construction and Inspection, WDFW, and Ecology.

***Consistent. In the unlikely event of a fish kill, all work will stop, and the construction contractor will notify all appropriate parties as well as the Project Manager for the Coast Guard. This is a notification process only.***

W. Navigation channels shall be kept free of hazardous or obstructing development or uses.

***Consistent. All work and any support vessels will remain clear of navigation channels. The project rehabilitation sites are currently developed and do not intersect with designated navigation channels.***

X. On waterfront lots uses that are not water-dependent shall be designed and located on the shoreline to encourage efficient use of the shoreline and to allow for water-dependent uses. Design considerations may include additional setbacks from all or a portion of the water's edge, joint use of piers and wharves with water-related or water-dependent uses, development of the lot with a mixture of water-related and water-dependent uses, or other means of ensuring continued efficient use of the shoreline by water-dependent uses.

***Not applicable. Project site uses are water dependent.***

Y. All open areas used for boat storage are required to be screened with natural existing vegetated buffers or planted landscaped areas except for lots with a dry land lot depth of less than 35 feet and areas within the UG, UI and UM Environments. Screening shall include a 5-foot-wide landscaping strip with native evergreen plantings at least 3 feet tall. The screening shall be located outside any required sight triangle. The requirement for screening may be waived or modified by the Director to address traffic safety.

***Not applicable. .The Coast Guard does have on-site boat storage for small boats. Security requirements, including anti-terrorism/force protection measures, would preclude the use of vegetative screening and would justify any waiver from screening.***

**23.60A.154 Standards for archaeological and historic resources**

A. Developments, shoreline modifications, and uses on any site having historic, cultural, scientific, or educational value, as defined by the Washington State Department of Archaeology and Historic Preservation and local tribes, shall reasonably avoid disruption of the historic, cultural, scientific, or educational resource.

***Consistent. In addition to shoreline modification, the overarching modernization project includes facilities renovation, demolition, and construction elements where such activities require consistency evaluation with respect to their spillover effects. Implementation of the project is consistent with Sections 23.60A.154.B through 23.60A.154.B as described below.***

B. Applications in areas documented by the Washington State Department of Archaeology and Historic Preservation to contain archaeological resources shall include a preliminary cultural resource evaluation or site inspection, and a written report prepared by a qualified professional archaeologist in compliance with Section 106 of the National Historic Preservation Act or State Executive Order 05-05, approved by the City, prior to the issuance of a permit. In addition, the archaeologist also shall provide copies of the draft report to affected tribes and the Washington State Department of Archaeology and Historic Preservation. After consultation with these tribes and agencies, the archaeologist shall provide a final report that includes any recommendations from affected tribes and the Washington State Department of Archaeology and Historic Preservation on avoidance or mitigation of the proposed project's impacts. The Director shall condition project approval based on the final report from the archaeologist to avoid, minimize, and mitigate impacts to the site consistent with federal and state law.

***Consistent. In support of Project evaluation, cultural resources background records were reviewed at the Washington Information System for Architectural and Archaeological Records Data (WISAARD), which is administered by the Washington State Department of Archaeology and Historic Preservation (DAHP). Records checked include archaeological site forms, historic property inventory forms, traditional cultural properties (TCPs), historic properties listed on the National Register of Historic Places (NRHP), cemeteries, and historic maps. There are no previously recorded archaeological resources within the Project area.***

***Twenty-five (25) historic built-environment resources were located within the 0.25-mile radius buffer, four of which have been previously documented within the Project area. Of the four previously recorded resources within the Project area, two are Coast Guard ships docked at Pier 36, which have both been previously evaluated for listing in the NRHP. Both were determined not eligible for listing in the NRHP in 2011, including Coast Guard Cutter Polar Sea, and U.S. Coast Guard Bayberry. The Bayberry has since been moved from Base Seattle None would be affected by Project implementation.***

***Elliott Bay and the Duwamish Waterway – which include waters and shoreline adjacent to the Project area – are within the usual and accustomed (U&A) fishing areas of the Muckleshoot and Suquamish Indian Tribes. Treaty-reserved fishing rights include access to and harvest of marine organisms. The Coast Guard District 13 Tribal Liaison is currently engaged in Government-to-Government consultation with the Muckleshoot Indian Tribe and the Suquamish Tribe regarding the project in accordance with Coast Guard public involvement planning and protocols to minimize impacts on tribal fisheries or U&A fishing rights. Prior to any construction activity, a meeting shall be conducted between the Coast Guard, construction and environmental contractors, and tribal representatives to discuss specific construction issues, concerns, and the construction schedule, as well as to promote general safety and awareness.***

C. If any archaeological resources are uncovered during the proposed work, work shall be stopped immediately, and the applicant shall notify the City, affected tribes, and the Washington State Department of Archeology and Historic Preservation. The applicant shall submit a site inspection and evaluation report by a qualified professional archaeologist, approved by the City, that identifies all possible valuable archaeological data and

makes recommendations on how to handle the data properly. When the report is prepared, the applicant shall notify affected tribes and the Washington State Department of Archaeology and Historic Preservation and provide them with copies of the report.

***Consistent. In addition to the steps identified above, the Coast Guard will ensure development of an Inadvertent Discovery Plan (IDP) for archaeological and historic resources in advance of project implementation (see BMPs). The IDP will be reviewed and approved by DAHP prior to construction. The IDP will be implemented during all project-related ground-disturbing activities to minimize impacts to unanticipated discoveries of archaeological resources, human remains, funerary objects, sacred objects, and cultural patrimony. The IDP will include a preconstruction tailgate meeting to familiarize all Contractor personnel with the IDP and the protocols that will be followed in the event of an unanticipated discovery. During ground disturbance activities, the Contractor must stop work immediately and notify the Coast Guard Environmental Representative if prehistoric artifacts are discovered. Under no conditions of inadvertent discovery are crews allowed to resume work until cleared by the Coast Guard Environmental Representative.***

D. If identified historical or archaeological resources are present, site planning and access to such areas shall be designed and managed to give protection to the resource and surrounding environment, and any permit issued shall be revised.

***Consistent. During ground disturbance activities, the IDP will direct that the Contractor must stop work immediately and notify the Coast Guard Environmental Representative if prehistoric artifacts are discovered. Site planning and access to areas will be designed and managed to protect the resource and surrounding environment.***

**23.60A.172 Applicable standards for shoreline modifications**

A. All shoreline modifications are subject to the standards set out in Subchapter III of this Chapter 23.60A.

B. Any proposed shoreline modification located on state-owned aquatic lands must provide evidence of notification to DNR prior to obtaining authorization from the Director.

C. All shoreline modifications are prohibited except as allowed, allowed as a special use, or allowed as a shoreline conditional use in this Section 23.60A.172 and Table A for 23.60A.172. If Table A for 23.60A.172 lists a shoreline modification in association with a specific use or other shoreline modification, that use or shoreline modification must be allowed, allowed as a special use, or allowed as a shoreline conditional use in the shoreline environment for which the shoreline modification is proposed.

**Excerpt from Table A for 23.60A.172 Applicable Standards for Shoreline Modifications**

| Shoreline Modifications | | Shoreline Environments | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | CM | CN | CP | CR | CW | UC | UG | UH | **UI** | UM | UR |
| 7. | Fill 7.a through 7.j are required to demonstrate that alternatives to fill are infeasible. | | | | | | | | | | | |
| 7.d. | Necessary to support a water dependent use. | CU | CU | X | CU | CU | CU | CU | CU | **CU** | CU | CU |
| P = Allowed by permit<br>CU = Shoreline Conditional Use<br>SU = Special Use<br>X = Prohibited<br>UI = Urban Industrial | | | | | | | | | | | | |

***Consistent. Subchapter III (General Provisions) includes Sections 23.60A.090 to 23.60A.220, and the applicable sections are included in this consistency evaluation. The project will take place on federally owned property. The project falls under 7.d, fill necessary to support a water-dependent use that meets additional criteria in Section 23.60A.184 (see below), and a conditional use (CU) in the Urban Industrial***

***(UI) shoreline environment. An alternative to the proposed shoreline modification is infeasible because its purpose is to maintain the structure and function of the shoreside infrastructure, which enables safe and reliable performance of water-dependent uses.***

**23.60A.184 Standards for fill**

A. In shoreline environments where fill is allowed or allowed as a special use or a shoreline conditional use it shall comply with the standards in Section 23.60A.172 and in this Section 23.60A.184.

B. Fill materials shall be of a quality that will not cause degradation of water or sediment quality.

***Consistent. Fill materials (concrete) will be non-toxic and appropriate for marine uses. Concrete will have contact with water only after curing. Water quality monitoring for turbidity and acidity (pH) will be performed.***

C. Solid waste, refuse, and debris shall not be placed in the water or on shorelands.

***Consistent. Solid waste, refuse, and debris will be managed and disposed of properly.***

D. Fills shall be designed, located, constructed, and managed to ensure stability of slopes created including the provision of vegetation, retaining walls, or other mechanisms for erosion prevention.

***Not applicable. Implementation of the project will not result in the creation of slopes.***

E. Dredged material not meeting the federal Environmental Protection Agency and Ecology criteria for open-water disposal may be used for fill in the water or shorelands if the applicant demonstrates that:

1. The fill meets the criteria for fill in Section 23.60A.172 and this Section 23.60A.184;
2. Either the area in which the fill material is placed has the same level of the same contaminant or the material is placed in a manner that it will not be a source of contaminants in an area cleaner than the proposed fill material;
3. The fill can be placed in the water or on the land without long-term adverse impacts to water quality, sediment quality, aquatic life, or human health, provided that if the fill is dredged material, placement of the material also complies with Section 23.60A.182; and
4. If classified by the state or federal government as problem or hazardous waste, any required federal Environmental Protection Agency and Ecology approval is obtained.

***Not applicable. Dredged material will not be used for fill.***

F. Fill shall not result in the creation of dry land except where necessary for transportation projects of statewide significance, as part of ecological restoration and enhancement, beach nourishment, mitigation, or where necessary to repair pocket erosion as allowed in subsection 23.60A.184.G.

***Not applicable. The proposed project will not create dry land.***

G. Fill that creates dry land that is necessary to repair pocket erosion between adjacent revetments is required to meet the standards of this Section 23.60A.184 and the following standards:

1. The repair of the erosion pocket is necessary to protect water-dependent or water-related uses;
2. The erosion pocket does not exceed 20 feet in length or 100 feet of shoreline, as measured between adjacent revetments;
3. The erosion pocket is in an area characterized by continuous revetments abutting and extending in both directions along the shoreline away from the erosion pocket;
4. The fill will not appreciably increase interference with a system of beach accretion and erosion; and
5. The fill does not extend beyond a line subtended between the adjacent revetments.

***Not applicable. The proposed project will not create dry land.***

H. Fill incidental to the repair or replacement of existing shoreline stabilization measures pursuant to Section 23.60A.020 and subsection 23.60A.188.F including, but not limited to, the replacement of riprap, or the replacement of a bulkhead directly in front of an existing bulkhead, as allowed in Section 23.60A.020, does not require approval as fill under this Section 23.60A.184, provided that the fill is the minimum necessary to accommodate the repair or replacement, the repair or replacement has been approved and pursuant to Section 23.60A.158.

***Not applicable. The proposed project is not incidental to the repair or replacement of existing shoreline stabilization measures pursuant to Section 23.60A.020 and Subsection 23.60A.188F.***

I. In applying mitigation sequencing pursuant to Section 23.60A.158, potential adverse impacts to be addressed include, but are not limited to: total water surface reduction; navigation restriction; impediment to water flow and circulation; reduction of water quality; disturbance of fish runs and other biological communities; and loss or modification of upland or shallow water vegetation functions and habitat and the adverse impacts of riprap migrating off-site and the impacts of the riprap at the off-site locations that are not retrieved as allowed pursuant to subsection 23.60A.184.H.

***Consistent. BMPs (Attachment A) will be implemented to avoid and minimize reduction of water quality, disturbance of fish runs and other biological communities, and other potential adverse effects. Reduction of total water surface, navigation restriction, or loss or modification of vegetation functions and habitat are not expected because the proposed shoreline modification will remain within the existing infrastructure footprint with no expansion. No riprap will be used.***

**23.60A.220 Environments established**

A. Shoreline environment locations

1. The shoreline environments set out in subsection 23.60A.220.C and the boundaries of these environments are established on the Official Land Use Map as authorized in Chapter 23.32.
2. Any undesignated shorelines are designated Conservancy Preservation.
3. Submerged lands seaward of the Outer Harbor Line, Construction Limit Line or other navigational boundary that are not specifically designated or shown on the Official Land Use Map shall be designated Conservancy Navigation.

B. Submerged Lands

1. On Puget Sound, Lake Washington and Green Lake, submerged lands shall be designated as shoreline environments that preserve them for ecological functions and public or recreational purposes.
2. On Elliott Bay, Lake Union, the Ship Canal, and the Duwamish River, submerged lands shall be designated as shoreline environments that balance preservation of ecological functions and a mix of public, recreational, industrial, and commercial purposes. In these areas; the environmental designation given to submerged lands is generally the same as the abutting waterfront dry land and extends to the outer Harbor Line, Construction Limit Line, or other navigational boundary.
3. Where the shoreline environment designation on submerged land is different from the shoreline environment designation of the adjacent dry land, the environment boundary is the OHW mark in freshwater environments and mean higher high water in saltwater environments.

C. For the purpose of this Chapter 23.60A, the Shoreline District is divided into 11 environments.

D. The purpose and locational criteria for each shoreline environment are as follows:

1. Urban Industrial (UI) Environment

a. Purpose. The purpose of the UI Environment is to:

1) Provide for efficient use of industrial shorelines by major cargo facilities and other water-dependent and water-related industrial uses, and to allow for warehouse uses that are not water- dependent or water-related where they currently exist;
2) Provide public access on public lands or in conformance with an area-wide Public Access Plan;
3) Accommodate ecological restoration and enhancement where reasonable; and
4) Allow limited non-water-oriented uses and development where they would not displace water-oriented uses and, if located on waterfront lots, where they achieve another goal of the Shoreline Management Act, such as protection or improvement of ecological functions or public access.

b. Locational Criteria

1) Areas zoned Industrial;
2) Areas adjacent to or part of major industrial centers that provide support services for water-dependent and other industrial uses; or
3) Areas where predominant uses are water-dependent or water-related manufacturing, warehousing, major port cargo facilities, or other similar uses.

***Consistent. The Coast Guard acknowledges the City of Seattle's designated shoreline environments and that the work is proposed in the vicinity of land designated as an Urban Industrial (UI) environment. The proposed shoreline modification is to rehabilitate piles and decking to enable safe and reliable waterfront-dependent activities. The project is consistent with maintenance of water-dependent infrastructure for efficient use of industrial shorelines by major water-dependent uses. The shoreline modification action would not change existing land use at the Project site. Further, it would not affect land use or existing development adjacent to the Project site. Applicable BMPs and conservation measures (Attachment A) such as the in-water work window to avoid impacts to salmonids will be employed to avoid and minimize negative effects to ecological functions.***

**Subchapter XIII: The Urban Industrial (UI) Environment**

**23.60A.480 Applicable standards in the UI Environment**

All uses and developments in the UI Environment Shoreline District, including shoreline modifications, are subject to the standards set out in Subchapter III of this Chapter 23.60A and to the standards for the UI Environment.

***Consistent. Subchapter III (General Provisions) consists of Sections 23.60A.090 to 23.60A.220, and the applicable sections are included in this consistency determination.***

**Part 1 Uses**

**23.60A.482 Uses in the UI Environment**

A. Use regulations

1. All uses on waterfront lots and over water are allowed, allowed as a special use, allowed as a shoreline conditional use, or prohibited pursuant to Section 23.60A.090, this Section 23.60A.482, Table A for 23.60A.482, and Section 23.60A.484. Use categories and subcategories cover all uses in that category and subcategory except when a subcategory of that use is specifically shown in Table A for 23.60A.482.
2. Waterfront lots, uses over water and water-dependent, water-related, and water-oriented uses

a. Table A for 23.60A.482 and subsections 23.60A.482.C through 23.60A.482.J apply to waterfront lots.

b. Uses over water are regulated in Section 23.60A.484.

c. If Table A for 23.60A.482 or the text of Section 23.60A.482 states that a use is required to be water-dependent or water-related, a use that does not have the required attribute is prohibited.

3. Regulations for specific shoreline modifications are set out in Sections 23.60A.172 through 23.60A.190.

***Consistent. The proposed shoreline modification is for the maintenance of water-dependent structures in accordance with A.2, regulations for specific shoreline modifications (Standards for fill; 23.60A.184, as addressed above).***

**Part 2 Development Standards**

**23.60A.486 Height in the UI Environment**

A. Maximum height. The maximum height is 35 feet, except as provided in subsections 23.60A.486.B through 23.60A.486.D.

***Consistent. In addition to shoreline modification, the overarching modernization project includes facilities renovation, demolition, and construction elements where facility heights require consistency evaluation with respect to their spillover effects (e.g., effects to viewsheds and visual corridors to the shoreline outside of the Federal installation resulting from project implementation). Implementation of the project is consistent with Sections 23.60A.486.B through 23.60A.486.D, as described below.***

B. Height exceptions

1. Cranes, mobile conveyers, light standards, and similar equipment necessary for the function of water-dependent uses or the servicing of vessels may extend above the maximum height limit;

***Consistent. Cranes and similar equipment use may be required.***

2. The Director may authorize up to 55 feet in the Ballard/Interbay Northend Manufacturing and Industrial Center and up to 80 feet for buildings and other structures in the Duwamish Manufacturing/Industrial Center for the following structures:

a. Structures for water-dependent and water-related uses, for uses accessory to a water-dependent or water-related uses, and for manufacturing if:

1) The structure requires additional height because of its intended use; and

2) The views from a substantial number of upland residences would not be substantially blocked by the increased height.

***Consistent. The proposed project is located in the Duwamish Manufacturing/Industrial Center. Facilities proposed for renovation and/or construction are required to support accessory uses for the Coast Guard's water-dependent uses. These uses include equipment storage, technological support, administrative functions, personnel support, etc. The building heights are intended for the Coast Guard to consolidate compatible functions for efficient space planning in single buildings, thereby conserving open areas for vessel-specific activities. The greatest building height proposed is 60 feet for a single five-story structure. That structure will be set back from street level and blocked from street views by an existing four-story (48-foot) structure. The views from upland residences would not be substantially blocked by development of the single building.***

b. An accessory structure to a water-dependent or water-related use if:

1) Allowing the additional height would result in a significant amount of additional usable area for the principal water-dependent or water-related use and/or additional area for ecological restoration and enhancement; and

2) No more than 20 percent of the site area is covered by portions of the structure that exceed the maximum height established in Section 23.60A.486; and

3) Eighty percent of the site is preserved through a covenant for water-dependent and/or water-related uses if uses that are not water-dependent or water-related occupy the structure; and

4) The views from a substantial number of upland residences would not be substantially blocked by the increased height; and

5) Permits issued pursuant to this subsection 23.60A.486.B shall identify the specific uses and gross floor areas of each use on the site.

***Consistent. Facilities proposed for renovation and/or construction are required to support accessory uses for the Coast Guard's water-dependent uses. These uses include equipment storage, technological support, administrative functions, personnel support, etc. The building heights are intended for the Coast Guard to consolidate compatible functions for efficient space planning in single buildings, thereby conserving open areas for vessel-specific activities. No more than 20 percent of the site is covered by portions of the structure that exceeds the maximum height established in Section 23.60S.486. As a Coast Guard installation, all activities and uses at the site are water dependent. Views from upland residents would not be blocked by the increased height of the single structure.***

C. Rooftop features

1. Radio and television receiving antennas, flagpoles, chimneys, smokestacks, and religious symbols for religious institutions are exempt from height controls, provided:

   a. The feature is no closer to any adjoining lot line than 50 percent of its height above existing grade; or

   b. If attached to the roof, the feature is no closer to any adjoining lot line than 50 percent of its height above the roof portion where attached.

   c. The width of the feature does not obstruct the view of the shoreline from a substantial number of residences within or adjoining the Shoreline District.

***Not applicable. Building development may include communication antennas or flagpoles and would be exempt from height controls.***

2. Clerestories, communication and accessory communication devices, firewalls, green roofs, greenhouses, monitors, open railings, parapets, planters, skylights and solar collectors may extend 4 feet above the maximum height limit under subsection 23.60A.486.A and 23.60A.486.B where allowed in the underlying zone, except where the width of such features obstructs the view of the shoreline from a substantial number of residences within or adjoining the Shoreline District, in which case the Director may reduce the height allowed.

***Not applicable. Building development is not proposed to exceed 80 feet in height.***

3. Stair and elevator penthouses and mechanical equipment may extend 10 feet above the maximum height if:

   a. The combined total coverage of all features does not exceed 20 percent of the roof area or 25 percent of the roof area if the total includes screened mechanical equipment;

   b. Allowed in the underlying zone or special district; and

c. The width of such features does not obstruct the view of the shoreline from a substantial number of residences within or adjoining the Shoreline District, in which case the Director may reduce the height allowed.

***Not applicable. Building development is not proposed to exceed 80 feet in height.***

4. Structures may extend 18 inches above the maximum height limit, including exceptions, if the roof insulation exceeds the energy code requirements in effect when the structure is constructed.

***Not applicable. Building development is not proposed to exceed 80 feet in height.***

D. Bridges. Bridges may exceed the maximum height limit.

***Not applicable. The project includes no bridges.***

**23.60A.488 Lot coverage in the UI Environment**

The lot coverage limits of the underlying zone shall not be exceeded.

***Not applicable. The project will take place on federally owned property. Nevertheless, lot coverage limits of the underlying zone will not be exceeded.***

**23.60A.490 Shoreline setbacks in the UI Environment**

A. A shoreline setback of 60 feet from the OHW mark is required for uses that are not water-dependent or water-related. No development, use, or shoreline modification is allowed within this shoreline setback except as provided in Section 23.60A.167 and subsection 23.60A.490.C.

***Not applicable. The project will take place on federally owned property, all uses are water-dependent, and there are no spillover effects related to shoreline setbacks.***

B. A shoreline setback of 15 feet from the OHW mark is required for water-dependent or water-related uses. No development, use, or shoreline modification is allowed within this shoreline setback except as provided in Section 23.60A.167 and subsection 23.60A.490.C.

***Not applicable. The project will take place on federally owned property. Nevertheless, the Project includes a shoreline setback of 15 feet of the OHW with the exception of the following elements as provided in Section 23.60A.167.D.3: equipment used for boat launching and landing; structures and equipment for loading and unloading material or product to or from water-borne equipment and vessels; structures used to operate or control water-borne equipment or vessels; structures and equipment for loading and unloading passengers, baggage, and supplies; existing structures and equipment for fire safety, dock-water, and the management of stormwater from water-dependent uses in accordance with the requirements of applicable laws, and the repair, replacement, or modification of such existing structures and equipment as necessary to maintain or improve fire safety or the management of water or stormwater; pipes used to convey water or stormwater; waste pump-out equipment; spill clean-up equipment; and other water-dependent uses to the extent they functionally need to be in the setback.***

C. Structures for uses accessory to a water-dependent use on site are allowed if the applicant demonstrates the conditions in subsection 23.60A.490.C.1 or 23.60A.490.C.2 exist and the applicant complies with subsection 23.60A.490.C.3:

1. The structure is used for a facility that is 75 percent a water-dependent use and larger than five acres and:

   a. The applicant demonstrates that the placement of the proposed structure outside the setback would interfere with the overall functionality of the water-dependent function of the facility; and

   b. An existing building on the site equal to the overall size within the setback is removed.

2. The new structure is located on a portion of the site where water access is not possible for the water-dependent use.

3. The applicant provides ecological restoration in an amount equivalent in square footage to the gross floor area of the structure pursuant to Section 23.60A.159.

***Not applicable. The shoreline setback is federal property. Further, existing and any proposed development of structures would have no spillover effect (i.e., an effect to resources outside of the Federal property resulting from project implementation).***

D. Existing structures that would be considered nonconforming because they are located in the required shoreline setback in the UI Environment are not regulated as nonconforming structures based on setback standards. Such structures may not be expanded in any manner in the setback but may be replaced if an area of ecological restoration equivalent to the footprint of the structure located in the shoreline setback within the Shoreline District is provided pursuant to Section 23.60A.159 or if the applicant can demonstrate that the replacement structure would meet the alternative sustainable development requirements, established by Director's Rule.

***Not applicable. The shoreline setback is federal property. Further, existing and any proposed development would have no spillover effect (i.e., an effect to resources outside of the Federal property resulting from project implementation).***

**23.60A.492 View corridors in the UI Environment**

A view corridor or corridors of not less than 35 percent of the width of the lot shall be provided and maintained on all waterfront lots, except if water-dependent or water-related uses occupy more than 50 percent of the dry land area of the lot.

***Consistent. Water-dependent uses occupy more than 50 percent of the dry land area of Base Seattle. These uses include not only permanent facilities / structures but also flexible-use space to support vessel maintenance, operations, staff support, etc. Use of this flexible space does not block view corridors.***

**23.60A.494 Regulated public access in the UI Environment**

A. Private property. Public access shall be provided and maintained on privately owned waterfront lots for the following developments:

1. Marinas, except as exempted in subsection 23.60A.200.D;
2. Existing yacht, boat and beach clubs that have facilities over water, that are not water dependent;
3. Development and uses that are not water-dependent, except
   a. Water-related uses that meet the definition of "Water-related use" #1 in Section 23.60A.944 and
   b. Development located on private lots in the Lake Union area that have a front lot line of less than 100 feet in length, measured at the upland street frontage generally parallel to the OHW, and abut a street and/or waterway providing public access.
4. If a lot contains a mix of uses that require public access and uses that are exempt, public access shall be provided unless the percentage of the lot that is covered by uses that are exempt from public access is more than 50 percent.

B. Utilities. Regulated public access shall be provided on utility-owned or controlled property within the Shoreline District.

***Not applicable. The proposed project is not on privately owned property.***

## 3.2 Clean Water Act / Washington Water Pollution Control Act (RCW 90.48)

The proposed Project is anticipated to be consistent with three primary provisions of the Clean Water Act (CWA). The Coast Guard will prepare a Section 404 (b) (1) Evaluation to assess the potential water

quality impacts of any in-water elements of the construction program. The Coast Guard will also prepare a Water Quality Certification request under Section 401 and submit a NPDES permit application and associated SWPPP to USEPA under Section 402. The Coast Guard has identified multiple BMPs in its proposed Mitigation Monitoring and Reporting Program that will be reflected in its Water Quality Protection and Monitoring Plan and SWPPP (refer to Attachment A and Appendix E of the PEIS). As identified herein, the Coast Guard has identified and will incorporate avoidance and minimization measures to reduce impacts to waters of the U.S.

The full configuration, design, and extent of shoreside modification in the form of rehabilitation construction is unknown at this time. Generally, such rehabilitation and modification activities could include actions such as pile removal, pile installation, use of barges, etc. which could affect water resources. Prior to implementing the Project, the Coast Guard will consult with regulatory agencies to determine BMPs, environmental commitments, and/or mitigation measures to avoid, minimize, or mitigate any potential adverse effects. The Coast Guard will formalize these commitments in the appropriate CWA permit applications.

Staging and construction support activities would have the potential to result in short-term adverse impacts to water quality. Throughout the duration of construction, hazardous materials would be stored and used within Base Seattle and the adjacent acquisition parcels. Hazardous wastes would also be generated throughout the duration of construction activities (e.g., used oil and other construction materials that exhibit ignitability, corrosivity, reactivity, or toxicity). The storage of construction materials and heavy construction equipment could result in the increased potential for accidental release and associated contamination, particularly maintenance and refueling of heavy construction equipment and power tools, which could result in the potential for accidental release of petroleum, oils, and lubricants (POLs). A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared to outline procedures to be followed in the event of an accidental spill during construction. The procedures in the SPCC Plan will ensure regular inspection of vehicles and equipment and will ensure spills occurring on land will be cleaned up immediately with no chance of migration to adjacent waterways.

Demolition activities would disturb hazardous building materials (e.g., asbestos, lead-based paint, etc.). If handled or stored improperly any such materials could have an adverse impact on water quality; however, all hazardous materials and wastes at Base Seattle shall be managed under the Hazardous Waste Management Model (Commandant Instruction [COMDTINST] M16478.1B). The Coast Guard will be required to comply with all federal, state, and local laws and regulations regarding the handling, temporary storage, and disposal of hazardous building materials. Ground-disturbing activities – including excavation, grading, and trenching – could result in exposure of contaminated soils. If contaminated soils are encountered, they shall be tested, used on site, or disposed of within a Class I hazardous waste landfill. The Coast Guard will ensure the implementation of dust abatement measures to avoid loose soil leaving the site and/or entering any waterways.

Construction activities that disturb one (1) or more acres are regulated under the USEPA NPDES Stormwater Permit Program and require a Construction Stormwater General Permit administered by Ecology (Ecology 2021). As part of compliance with this program, regulated construction sites are required to: develop SWPPPs; implement sediment, erosion, and pollution prevention control measures; and obtain coverage under the Construction Stormwater General Permit. The SWPPP prepared by the Coast Guard will include BMPs for minimizing and containing dust, debris, and fuels, or other potentially hazardous materials from entering adjacent surface waters during construction. The Coast Guard will work closely with the Port of Seattle to ensure stormwater management systems are separated from Port activities and stormwater management requirements as determined by USEPA continue to remain in compliance with any consent orders issued for their respective properties.

During construction activities, the use of heavy equipment and power tools would also result in the potential for accidental leaks and spills. The procedures in the SPCC Plan will ensure spills occurring on land would be cleaned up immediately with no chance of migration to adjacent waterways. The use of heavy equipment could result in ground-borne vibrations; however, upland construction-related vibrations are expected to be minimal and would not result in the resuspension of sediments or associated contaminants within the water column. (Ground-borne vibration dissipates rapidly with distance from the source.) If vibrations would be anticipated from unique construction needs or techniques, the Coast Guard will reevaluate potential effects on water quality resulting from vibrations, as necessary.

Stormwater runoff would continue to be generated from rain events that result in sheetflow over the impervious surfaces including paved streets, parking lots, and building rooftops. Stormwater runoff picks up pollutants like trash, chemicals, oils, and dirt/sediment that can degrade adjacent waterways and wildlife habitat. The proposed modernization of Base Seattle would include improvements, upgrades, and/or replacement of aging stormwater systems which would result in an overall better functioning system. Base Seattle currently meets USEPA's no exposure exclusion and therefore does not require a NPDES/Municipal Separate Storm Sewer System (MS4) permit. Modernization activities would not result in an increase of impervious surfaces within Base Seattle or the adjacent acquisition parcels, and operational activities would remain consistent with activities conducted at Base Seattle today. The Coast Guard anticipates that the Base would continue to meet USEPA's no exposure exclusion.[3] Improvement, upgrade, and/or replacement of aging infrastructure would reduce the potential for leaks and/or failures of the existing stormwater management system. Adjacent properties encompass a mix of Port of Seattle and City-owned stormwater facilities which are managed separately. Although design details and stormwater management plans have not yet been completed, the Coast Guard would work with the Port of Seattle and City to ensure separate stormwater flows and/or management needs are met. Although the proposed modernization is anticipated to increase parking area, the overall pollution generating pavement/impervious surface coverage and resultant runoff is expected to be consistent with existing conditions as Base Seattle and the surrounding properties are already developed with impervious surfaces. No change to stormwater management or water quality degradation is anticipated. Port-owned properties would still manage stormwater through their agreements with the USEPA for treatment and would not discharge to adjacent waterbodies.

Following construction, Coast Guard operations would remain identical to existing operations at Base Seattle; however, there would be an increase in total personnel, which would translate to an increase in day-to-day vehicles entering the facility. Vehicles and equipment used for facility operations would entail the use of fuels, oils, lubricants, and other petroleum-related products. Accidental releases of petroleum and other related products from vehicles and equipment would be limited by proper maintenance, inspection, and operation, as well as implementation of the SWPPP and the SPCC Plan. In the event of an accidental release, cleanup would take place, booms and other spill containment equipment kept on hand would be deployed immediately, and the source of the release would be determined and secured.

Proposed improvements would be implemented outside of the boundaries of the FEMA 100-year floodplain. The Base is located within *Zone VE*, a coastal flood zone containing additional hazards associated with storm waves. Under implementation of the Project, critical systems and supporting infrastructure (e.g., include storage tanks, transformers, switchgears, electrical, mechanical, and communication closets) would be located at least 3 feet above the 100-year floodplain to ensure operational continuation and safety after a flood event. Since no increase to impervious surfaces is proposed, no increase to sheet runoff or flooding is anticipated. The final design of the proposed improvements would also account for long-term sea level rise projections in the region by including the

[3] Under the conditional no-exposure exclusion (40 CFR §122.26[g]), operators of industrial facilities subject to stormwater regulations have the opportunity to certify to a condition of "no exposure" if their industrial materials and operations are not exposed to stormwater.

use of "sacrificial" floors (i.e., elevated or unoccupied) in new buildings.

Without Project implementation, there would be no changes related to land acquisition, construction, demolition, or renovation, and long-term operations at Base Seattle. the existing stormwater system would not be improved and would require maintenance and repair on a regular basis given the system's age. Without the proposed repair, upgrades, or replacement activities, the ongoing potential for leaks and /or failures of the existing stormwater management system would remain. Existing facilities and infrastructure would remain unimproved from current conditions. There would be no upgrades to improve stormwater facilities or sustainability improvements (e.g., low water-use fixtures, etc.).

The proposed action is compliant with the CWA and is expected to be consistent with the relevant policies of the SMA.

## 3.3 Clean Air Act / Washington Clean Air Act (RCW 70.94)

The proposed Project is anticipated to remain in compliance with the CAA and the SIP. This is not a transportation project; it does not qualify as a major stationary source of emissions of criteria pollutants and the Project is not located in a non-attainment area for limited air quality. Further, the Coast Guard has committed to implement BMPs, environmental commitments, and special procedures specific to air quality for project implementation and mitigation monitoring and reporting to avoid impacts to air quality to the maximum extent practicable.

Air quality within the Salish Sea airshed, within which the Project is located, is monitored at 13 air monitoring stations, the closest to Base Seattle are Seattle Duwamish and Seattle South Park. The greater Seattle-Tacoma area, also within the Salish Sea airshed, is in *attainment* for all criteria pollutants. The airshed was previously designated as nonattainment for ozone ($O_3$), carbon monoxide (CO), and particulate matter ($PM_{10}$) (USEPA 2021); however, maintenance levels have been achieved and the 20-year maintenance period has been completed.

Acquisition of property would result in the displacement of existing Port operations, such as cargo storage, transport, and related services. These displaced functions would either be eliminated or relocated elsewhere within Port properties. If these functions were to be eliminated, associated operational emissions (e.g., mobile source emissions associated with the transport of cargo containers) would also be eliminated. If the functions were relocated in kind, there would be changes in long-term mobile source emissions (e.g., associated with the distance that short-haul trucks would be required to travel in order to transfer cargo containers from container ships, rail yards, warehouses, or other storage lots). Port functions on specific properties change over time. For example, Terminal 46 is currently used for container storage, but has been previously used a cargo terminal. Additionally, the Port of Seattle/Northwest Seaport Alliance has previously considered the construction of new cruise ship terminal at the northern portions of Terminal 46. As such the resulting change in long-term mobile source emissions from displacement is difficult to project; however, it is assumed that existing Port functions would be substantially relocated within the Port and emissions associated with these functions would remain within the airshed.

Criteria air pollutant emissions would occur as a result of construction, demolition, and renovation activities associated with the Project. These emissions would occur episodically throughout the lifetime of the program associated with the planned major construction projects. Emissions would begin with staging and construction support activities. Any temporary rerouting of traffic within the vicinity of the Base (e.g., along Alaskan Way South during periods of demolition debris export) would likely result in short-term increases in mobile source criteria air pollutant emissions as a result of associated increases in trip lengths. However, these increases in trip lengths would be limited (i.e., less than 5 miles) and temporary for the duration of construction activities. The Contractor would be responsible for preparing and implementing a Traffic Management Plan that would establish clear traffic routing and minimize detours. Heavy haul truck trips would be required to deliver construction equipment and materials to and from

construction sites with resultant emissions. Similarly, construction workers would commute to construction sites on a daily basis with resultant emissions. Additional construction traffic, including export of demolition debris, delivery of materials, and construction worker commutes would increase the number of vehicles transiting on local and regional roadways.

Hazardous air pollutants (HAPs) could also be generated during staging and construction support activities as a result of the generation, use, and storage of hazardous materials and wastes. The generation, use, and storage of such hazardous materials and wastes however would be in limited quantities and in compliance with all applicable federal, state, and local laws, regulations, and guidance, as necessary, which would reduce the potential for emission of these materials into the air.

Fugitive dust would be generated during facility construction activities, including from demolition of pavements and sidewalks as well as excavation and grading in support of proposed development. Fugitive dust emissions generated by such activities can vary substantially depending on levels of activity, specific operations, and prevailing meteorological conditions. The standard dust emission factor for general non-residential construction activity is conservatively estimated at 0.42 tons of $PM_{10}$ generated per acre per month of activity (USEPA 2006). Per procedures documented in the National Emissions Inventory (USEPA 2006), $PM_{2.5}$ emissions are estimated by applying a particle size multiplier of 0.10 to $PM_{10}$ emissions. The USEPA National Emissions Inventory documentation assumes that emissions resulting from construction-related activities are uncontrolled. Fugitive dust resulting from demolition and grading activities can however be reduced through the implementation of standard dust minimization practices, including regularly watering exposed soils and soil stockpiling. When implemented, these dust minimization measures can reduce dust generation by up to 50 percent (USEPA 2006).

The use of heavy construction equipment would also generate short-term increases in criteria air pollutant emissions. The details of such activities (e.g., required construction equipment, hours of operation, operating conditions) are not currently known for the proposed modernization; however, criteria air pollutants associated with heavy construction equipment would be similar to those used in most common construction activities. The DB Contractor would adhere to the emission limits for the engines as regulated by Ecology. Nevertheless, even with conservative assumptions (e.g., all heavy equipment in operation for 8 hour per day, 5 days per week, 12 months per year) would remain below *de minimis* thresholds defined at 40 CFR §93.153.

It should also be noted that heavy construction equipment is currently in operation within the airshed and may be redistributed in support of the proposed construction, demolition, and renovation activities. Therefore, these emissions may not necessarily constitute new sources of emissions.

The proposed Project is consistent with the CAA and pertinent policies of the SMA.

# 4. Statement of Consistency

***Based on the evaluations above, the Coast Guard has determined that the proposed Project is consistent to the maximum extent practicable with the enforceable policies of the approved coastal zone management program of Washington State. The Coast Guard has reviewed and considered policies as specified in the local planning documents for the City of Seattle (City of Seattle 2020 and 2022) to ensure consistency to the maximum extent practicable. The action is, therefore, consistent with the State of Washington's CZM Program to the maximum extent practicable.***

# 5. Citations

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City of Seattle. 2022. Chapter 23.60A – Seattle Shoreline Master Program Regulations. https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT23LAUSCO_SUBTITLE_IIILAUSRE_CH23.60ASESHMAPRRE. Accessed 2022.

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USEPA. 2006. Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants. Prepared for: Emissions Inventory and Analysis Group (C339-02), July 2006.

USEPA. 2021. Green Book. Washington Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. Available at: https://www3.epa.gov/airquality/greenbook/anayo_wa.html. Accessed on: 6 October 2021.

# Attachment A: Best Management Practices

**Water Resources**

Best Management Practices (BMPs) and special procedures relevant to water quality and related resources have been identified for Project implementation and are presented below. The full configuration, design, and extent of shoreside modification in the form of rehabilitation construction is unknown at this time. Generally, such rehabilitation and modification activities could include actions such as pile removal, pile installation, use of barges, etc. which could affect water resources. Prior to implementing the Project, the Coast Guard will consult with regulatory agencies to determine BMPs, environmental commitments, and / or mitigation measures to avoid, minimize, or mitigate any potential adverse effects.

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| The Action Proponent (CG43) and the DB Contractor shall ensure that any project disturbing one or more acres submits a Storm Water Pollution Prevention Plan (SWPPP). The Action Proponent (CG43) and the DB Contractor shall ensure Storm Water Management Plans are submitted to the Coast Guard Environmental Representative for review a minimum of 21 working days prior to the commencement of work. The Coast Guard Environmental Representative is solely responsible for reviewing, providing comments, and approving SWPPP and Erosion Control Plans (i.e., these plans shall not be submitted to the State). The Action Proponent (CG43) and the DB Contractor shall ensure work does not commence until the SWPPP or Erosion Control Plan has been approved by the Coast Guard. |
| Construction, renovation, and upgrade of facilities and infrastructure would be accomplished in accordance with Coast Guard standards for new buildings. In accordance with applicable laws and regulations, Coast Guard policy (Coast Guard 2014), and Coast Guard guidance (Coast Guard 2020), the Coast Guard would include design elements to improve sustainability and resiliency in future construction. The Coast Guard would conduct construction in accordance with The Guiding Principles for Sustainable Federal Buildings and Associated Instructions (CEQ 2020) or applicable guidance at the time of construction to address vulnerability to sea level rise and commitments to structural resiliency, long-term sustainability (including minimization of energy consumption, greenhouse gas emissions, waste generation, etc.), and security. |
| To the extent practicable, all new facilities will be designed to the following standards:<br>▪ American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 90.1 2019, Energy Standard for Buildings Except Low-Rise Residential Buildings<br>▪ ASHRAE Standard 189.1-2017, Standard for the Design of High-Performance Green Buildings<br>▪ CSTO Electric Vehicle Support Equipment (SILC CSTO-11 31 17 11-02)<br>▪ Guiding Principles for Sustainable Federal Buildings and Associated Instructions 2016 |
| All applicable permits (e.g., Clean Water Act Section 402) will be obtained prior to the start of any construction activities. |

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| A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared to outline procedures to be followed to minimize the likelihood of an accidental spill of petroleum product and to respond in the event of an accidental spill of petroleum product. The SPCC Plan will provide maintenance and/or operational guidance to include:<br>▪ Regular inspection of vehicles and equipment;<br>▪ Ensuring that vehicles and equipment are in good physical condition (e.g., no leaks); and<br>▪ Specifications to ensure that refueling will not occur on site or will only occur in designated areas that have been identified to eliminate the potential for accidental spills to migration offsite or into waters.<br>The SPCC Plan will identify procedures to ensure that land-based spills will not migrate to groundwater, adjacent surface waters, or upland areas with vegetation that may be used as food sources for terrestrial species. |
| The new infrastructure improvements shall be designed so that they do not increase flooding risks by substantially increasing peak runoff volumes. Designs shall consider, but not be limited to, including infiltration strips or porous paving in designsfor parking areas or other sites. |
| The design shall incorporate drainage swale designs that direct stormwater runoff or irrigation runoff away from the structures orthe top of the slopes to control drainage facilities. No stormwater shall be allowed todischarge over the top of a cut or fill slope. |
| The Coast Guard shall ensure that all facilities are planned in coordination with Facilities Design and Construction Center (FDCC) and include the necessary containment structures, wash stations, or water treatment facilities. Design shall meet Unified Facilities Criteria (UFC), Federal, state, local, and Coast Guard requirements. |
| The Designer of Record shall ensure that project-related activities are in accordance with all applicable CTSOs and Executive Orders for water conservation. |
| The DB Contractor shall conduct geotechnical studies before beginning excavation and grading to evaluate groundwater depth and shall use proper well construction methods (i.e., rotary drilling methods) to minimize impacts to groundwater. |
| The DB Contractor shall ensure that all disturbed slopes or other graded features are properly stabilized. The construction shall be phased to minimize disturbed ground, exposed area, and sediment runoff/fugitive dust potential. Further, the DB Contractor shall minimize areas of disturbance, cover stockpiled soil and dump truck loads; use windbreak enclosures; and apply water and / or other soil stabilizers. Any water released during fugitive dust control will be managed to ensure that no water has the potential to be discharged to Elliott Bay. |
| If contaminated soils are encountered, they shall be tested, used on site or disposed of within a Class I hazardous waste landfill, or disposed of in the lined portion of a certified municipal landfill. |

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| The Action Proponent (CG43) and the DB Contractor shall ensure that no projects are closed that have stormwater requirements or permits without written consent from the Coast Guard Environmental Representative. |
| The Action Proponent (CG43) and the DB Contractor shall ensure that the DB Contractor adheres to Coast Guard policies water conservation measures. |
| The Action Proponent (CG43) and the DB Contractor shall ensure that any storm water runoff from construction site is controlled/released to proper storm water channels and clear of any contaminants. BMPs established in the SWPPP will be followed. |
| Action Proponent (CG43) shall ensure that no water, waste stream, or other materials are discharged into storm channels without written pre-approval from the Coast Guard Environmental Representative. |
| All stockpiled material will use dust control measures (e.g., cover, hydroseed) and will be stored in a manner that shall prevent runoff in the event of overwatering of the site or a storm event. |
| The Action Proponent (CG43) and the DB Contractor shall ensure that all paints, solvents, and equipment used in painting are handled per project specific SWPPPs and are not washed out on the ground. |
| The DB Contractor shall conduct geotechnical studies before beginning excavation and grading to evaluate groundwater depth and shall use proper well construction methods (i.e., rotary drilling methods) to minimize impacts to groundwater. |
| The DB Contractor shall ensure that all disturbed slopes or other graded features are properly stabilized. The construction shall be phased to minimize disturbed ground, exposed area, and sediment runoff/fugitive dust potential. Further, the DB Contractor shall minimize areas of disturbance, cover stockpiled soil and dump truck loads; use windbreak enclosures; and apply water and / or other soil stabilizers. Any water released during fugitive dust control will be managed to ensure that no water has the potential to be discharged to Elliott Bay. |
| If contaminated soils are encountered, they shall be tested, used on site or disposed of within a Class I hazardous waste landfill, ordisposed of in the lined portion of a certified municipal landfill. |
| The Action Proponent (CG43) and the DB Contractor shall ensure that no projects are closed that have stormwater requirements or permits without written consent from the Coast Guard Environmental Representative. |
| The Action Proponent (CG43) and the DB Contractor shallensure that the DB Contractor adheres to Coast Guard policies water conservation measures. |
| The Action Proponent (CG43) and the DB Contractor shall ensure that any storm water runoff from construction site is controlled/released to proper storm water channels and clear of any contaminants. BMPs established in the SWPPP will be followed. |

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| Action Proponent (CG43) shall ensure that no water, waste stream, or other materials are discharged into storm channels without written pre-approval from the Coast Guard Environmental Representative. |
| All stockpiled material will use dust controlmeasures (e.g., cover, hydroseed) and will be stored in a manner that shall prevent runoff in the event of overwatering of the site or a storm event. |
| The Action Proponent (CG43) and the construction contractor shall ensure that all paints, solvents, and equipment used in painting are handled per project specific SWPPPs and are not washed out on the ground. |
| The construction contractor will exercise all appropriate precaution to minimize the release of any material into the adjacent waters should the removal of treated wood pilings require cutting. |

**Air Quality**

BMPs, environmental commitments, and special procedures relevant to air quality and related resources have been identified for Project implementation and are presented below:

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| Construction, renovation, and upgrade of facilities and infrastructure would be accomplished in accordance with Coast Guard standards for new buildings. In accordance with applicable laws and regulations, Coast Guard policy (Coast Guard 2014), and Coast Guard guidance (Coast Guard 2020), the Coast Guard would include design elements to improve sustainability and resiliency in future construction. The Coast Guard would conduct construction in accordance with The Guiding Principles for Sustainable Federal Buildings and Associated Instructions (CEQ 2020) or applicable guidance at the time of construction to address vulnerability to sea level rise and commitments to structural resiliency, long-term sustainability (including minimization of energy consumption, greenhouse gas emissions, waste generation, etc.), and security. |
| To the extent practicable, all new facilities will be designed to the following standards:<br>▪ American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 90.1 2019, Energy Standard for Buildings Except Low-Rise Residential Buildings<br>▪ ASHRAE Standard 189.1-2017, Standard for the Design of High-Performance Green Buildings<br>▪ CSTO *Electric Vehicle Support Equipment* (SILC CSTO-11 31 17 11-02)<br>▪ Guiding Principles for Sustainable Federal Buildings and Associated Instructions 2016 |
| The DB Contractor shall ensure that all disturbed slopes or other graded features are properly stabilized. The construction shall be phased to minimize disturbed ground, exposed area, and sediment runoff/fugitive dust potential. Further, the DB Contractor shall minimize areas of disturbance, cover stockpiled soil and dump truck loads; use windbreak enclosures; and apply water and / or other soil stabilizers. Any water released during fugitive dust control will be managed to ensure that no water has the potential to be discharged to Elliott Bay. |

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| The DB Contractor shall employ dust abatement measures to minimize fugitive dust emissions during construction. These measures may include watering or theapplication of a commercial polymer-based soil stabilizer product to the laydown and staging areas to semi-permanently eliminatedust emissions. The DB Contractor shall obtain Coast Guard approval prior to the use or application of commercial polymer-based soil stabilizer products. To do so, the DB Contractor shall designate personnel to monitor the dust control program and to increase dust suppression measures (e.g., watering or application of polymer-based soil stabilizer), as necessary, to minimize the generation of dust. |
| The Action Proponent (CG43) shall ensure that the DB Contractor ensures that fugitive dust from any transport, handling, construction, or storage activity does not remain visible in the atmosphere beyond the project or worksite footprint. The Action Proponent (CG43) shall take every reasonable precaution to minimize fugitive dust emissions from demolition, excavation, grading, clearing of land, and solid waste disposal operations. |
| The Action Proponent (CG43) shall ensure that the DB Contractor adheres to the emission limits for engines as regulated by the Washington State Department of Ecology. |
| The Action Proponent (CG43) shall ensure that the DB Contractor ensures all paints, coatings, adhesives, and solvents use/applications follow the guidelines established by the Washington State Department of Ecology. A daily log shall be maintained of the volatile organic compounds (VOCs) used or emitted. The log shall contain at least the following: type of equipment for application, type of material,manufacturer of material, quantity of each coating, solvent used, and its volatile organic compounds content (VOCs must be in pounds per gallon or grams per liter). |
| The Action Proponent (CG43) shall ensure that the DB Contractor ensures that refrigerant used in air conditioning units is a non-chlorofluorocarbon or hydrofluorochlorocarbon. The Action Proponent (CG43) and the DB Contractor shall take all necessary precautions (e.g., proper training,training certifications, and equipment) to ensure that no refrigerants are released to the atmosphere. If refrigerants are released, the DB Contractor shall immediately notify the Coast Guard Environmental Representative of all refrigerant releases and estimated amount of release |
| The Action Proponent (CG43) shall ensure that the DB Contractor provides the following information to the Coast Guard Environmental Representative to register the equipment on the Refrigerant Management Inventory prior to being placed into service:equipment specifications (type, manufacture, model, model year, and serial numbers), installation date, refrigerant type,refrigerant charge (pounds), leak detection device (if applicable), location description (to include building number and floorplan of refrigerant placement), and system function. |
| All stockpiled material will use dust controlmeasures (e.g., cover, hydroseed) and will be stored in a manner that shall prevent runoff in the event of overwatering of the site or a storm event. |

| **Biological Resources** |
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| Should construction activities occur outside of standard daylight working hours, lighting will be used to minimize upward light pollution and avoid spill-over into adjacent properties and water to the extent practicable. |

| **Cultural Resources** |
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| Develop an IDP in advance of permitting. The IDP will be reviewed and approved by the permitting agency and DAHP prior to construction. The IDP will be implemented during all project-related ground disturbing activities to minimize impacts to unanticipated discoveries of archaeological resources and/or human remains, human remains, funerary objects, sacred objects and cultural patrimony. The IDP will include a preconstruction tailgate meeting to familiarize all Contractor personnel with the IDP and the protocols that will be followed in the event of an unanticipated discovery. During ground disturbance activities, the Action Proponent (CG-43) and the Contractor must stop work and immediately and notify the Coast Guard Environmental Representative if prehistoric artifacts are discovered. Under no conditions of inadvertent discovery are crews allowed to resume work until cleared by the Coast Guard Environmental Representative. |

# Appendix H:
# Species Lists

# EFH Mapper Report

## EFH Data Notice

Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional fishery management councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

West Coast Regional Office
Alaska Regional Office

## Query Results

Degrees, Minutes, Seconds: Latitude = 47º 35' 31" N, Longitude = 123º 39' 16" W
Decimal Degrees: Latitude = 47.592, Longitude = -122.346

The query location intersects with spatial data representing EFH and/or HAPCs for the following species/management units.

### EFH

| Link | Data Caveats | Species/Management Unit | Lifestage(s) Found at Location | Management Council | FMP |
|---|---|---|---|---|---|
| | | Finfish | ALL | Pacific | |
| | | Krill - Thysanoessa Spinifera | ALL | Pacific | |
| | | Krill - Euphausia Pacifica | ALL | Pacific | |
| | | Other Krill Species | ALL | Pacific | |
| | | Coastal Pelagic Species | ALL | Pacific | |
| | | Groundfish | ALL | Pacific | Groundfish |

### Salmon EFH

No Pacific Salmon Essential Fish Habitat (EFH) were identified at the report location.

### HAPCs

| Link | Data Caveats | HAPC Name | Management Council |
|---|---|---|---|
| | | Estuaries | Pacific |

### EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

**Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.**
****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**

**Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.**
****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**

**Pacific Coastal Pelagic Species**,
Jack Mackerel,
Pacific (Chub) Mackerel,
Pacific Sardine,
Northern Anchovy - Central Subpopulation,
Northern Anchovy - Northern Subpopulation,
**Pacific Highly Migratory Species**,
Bigeye Thresher Shark - North Pacific,
Bluefin Tuna - Pacific,
Dolphinfish (Dorado or Mahimahi) - Pacific,
Pelagic Thresher Shark - North Pacific,
Swordfish - North Pacific

# United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington Fish And Wildlife Office
510 Desmond Drive Se, Suite 102
Lacey, WA 98503-1263
Phone: (360) 753-9440 Fax: (360) 753-9405
http://www.fws.gov/wafwo/


In Reply Refer To: March 10, 2022
Project Code: 2022-0018441
Project Name: Base Seattle Expansion and Modernization Program

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

**Migratory Birds**: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see https://www.fws.gov/birds/policies-and-regulations.php.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

# Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Washington Fish And Wildlife Office**
510 Desmond Drive Se, Suite 102
Lacey, WA 98503-1263
(360) 753-9440

# Project Summary

Project Code: 2022-0018441
Event Code: None
Project Name: Base Seattle Expansion and Modernization Program
Project Type: Military Development
Project Description: Demolition and construction project at Base Seattle and some adjoining properties to renovate/replace certain buildings and prepare for future homeporting of more USCG ships.
Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@47.5930747,-122.35593789040482,14z

Counties: King County, Washington

# Endangered Species Act Species

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Birds

| NAME | STATUS |
|---|---|
| Marbled Murrelet *Brachyramphus marmoratus*<br>Population: U.S.A. (CA, OR, WA)<br>There is **final** critical habitat for this species. The location of the critical habitat is not available.<br>Species profile: https://ecos.fws.gov/ecp/species/4467 | Threatened |
| Streaked Horned Lark *Eremophila alpestris strigata*<br>There is **final** critical habitat for this species. The location of the critical habitat is not available.<br>Species profile: https://ecos.fws.gov/ecp/species/7268 | Threatened |
| Yellow-billed Cuckoo *Coccyzus americanus*<br>Population: Western U.S. DPS<br>There is **final** critical habitat for this species. The location of the critical habitat is not available.<br>Species profile: https://ecos.fws.gov/ecp/species/3911 | Threatened |

## Fishes

| NAME | STATUS |
|---|---|
| Bull Trout *Salvelinus confluentus*<br>Population: U.S.A., conterminous, lower 48 states<br>There is **final** critical habitat for this species. Your location overlaps the critical habitat.<br>Species profile: https://ecos.fws.gov/ecp/species/8212 | Threatened |

## Insects

| NAME | STATUS |
| --- | --- |
| Monarch Butterfly *Danaus plexippus*<br>No critical habitat has been designated for this species.<br>Species profile: https://ecos.fws.gov/ecp/species/9743 | Candidate |

## Critical habitats

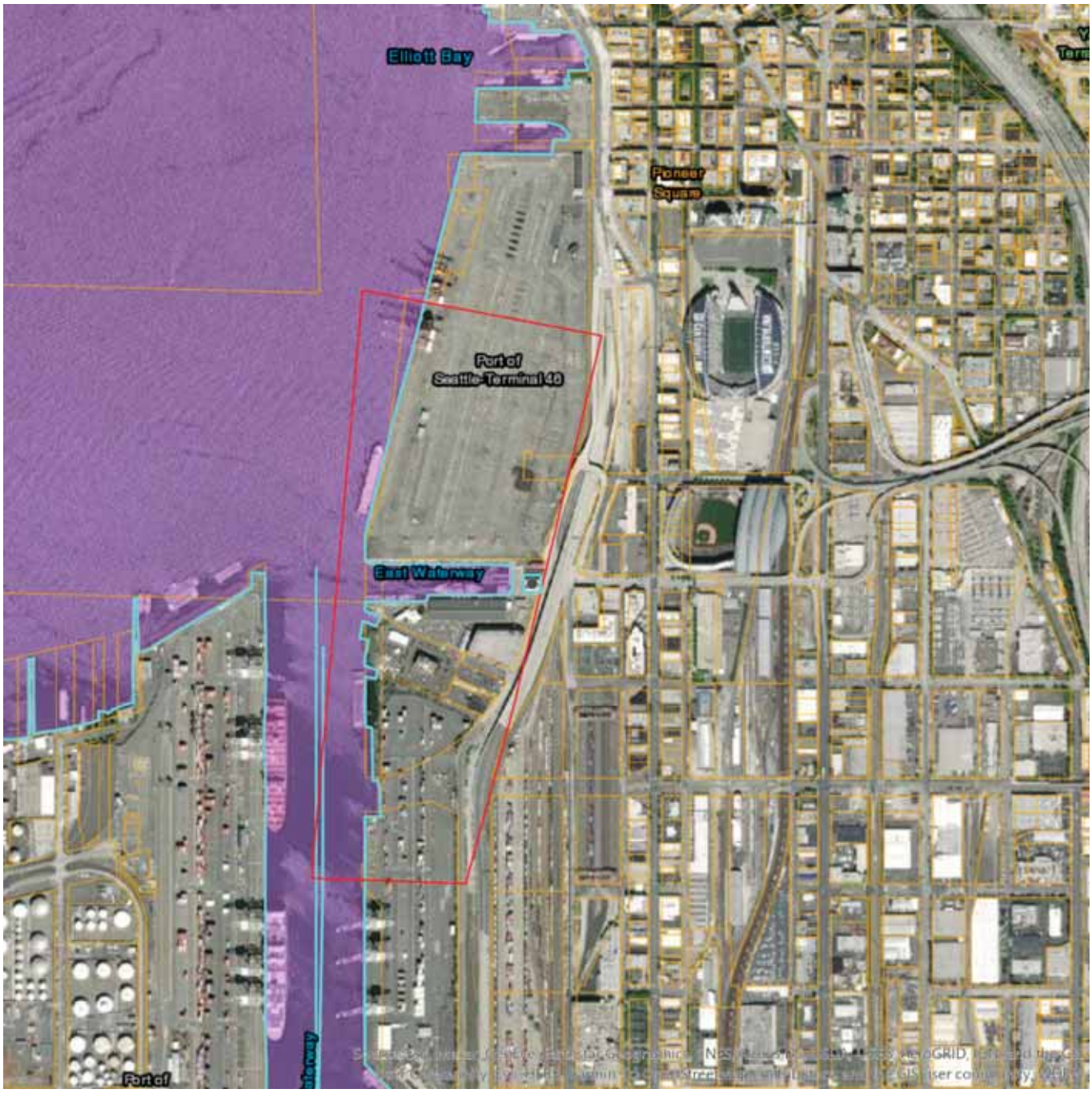
There is 1 critical habitat wholly or partially within your project area under this office's jurisdiction.

| NAME | STATUS |
| --- | --- |
| Bull Trout *Salvelinus confluentus*<br>https://ecos.fws.gov/ecp/species/8212#crithab | Final |

## IPaC User Contact Information


| | |
|---|---|
| Agency: | Wood Environment & Infrastructure Solutions, Inc. |
| Name: | Christy Benes |
| Address: | 285 Davidson Ave. |
| Address Line 2: | Suite 405 |
| City: | Somerset |
| State: | NJ |
| Zip: | 08873 |
| Email | christy.benes@woodplc.com |
| Phone: | 8487028437 |

# Priority Habitats and Species on the Web




**Report Date: 10/01/2021**

PHS Species/Habitats Overview:

| Occurence Name | Federal Status | State Status | Sensitive Location |
|---|---|---|---|
| Steelhead | Threatened | N/A | No |
| Resident Coastal Cutthroat | N/A | N/A | No |
| Coho | N/A | N/A | No |
| Chinook | Threatened | N/A | No |
| Winter Steelhead | N/A | N/A | No |
| Coho | Candidate | N/A | No |
| Bull Trout | Threatened | N/A | No |
| Sockeye | N/A | N/A | No |
| Chum | Not Warranted | N/A | No |
| Fall Chinook | N/A | N/A | No |
| Fall Chum | N/A | N/A | No |
| Summer Steelhead | N/A | N/A | No |
| Esturine Zone | N/A | N/A | No |

## PHS Species/Habitats Details:

| Steelhead | |
|---|---|
| Scientific Name | *Oncorhynchus mykiss* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Green River (Duwamish) Summer Steelhead, Run: Summer, Status: Depressed |
| Source Record | 6168 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Threatened |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Resident Coastal Cutthroat | |
|---|---|
| Scientific Name | *Oncorhynchus clarki* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Cutthroat Trout, Run Time: Unknown or not Applicable, Life History: Unknown |
| Source Record | 41828 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Coho | |
|---|---|
| Scientific Name | *Oncorhynchus kisutch* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Coho Salmon, Run Time: Unknown or not Applicable, Life History: Anadromous |
| Source Record | 41831 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Chinook | |
|---|---|
| Scientific Name | *Oncorhynchus tshawytscha* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Green River (Duwamish) Chinook, Run: Sum/Fall, Status: Healthy |
| Source Record | 1160 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Threatened |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Winter Steelhead | |
|---|---|
| Scientific Name | *Oncorhynchus mykiss* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Steelhead Trout, Run Time: Winter, Life History: Anadromous |
| Source Record | 41834 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Steelhead | |
|---|---|
| Scientific Name | *Oncorhynchus mykiss* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Green River (Duwamish) Winter Steelhead, Run: Winter, Status: Healthy |
| Source Record | 6175 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Threatened |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Coho | |
|---|---|
| Scientific Name | *Oncorhynchus kisutch* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Green River/Soos Creek Coho, Run: Unspecified, Status: Healthy |
| Source Record | 3140 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Candidate |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Bull Trout | |
|---|---|
| Scientific Name | *Salvelinus malma/S. confluentus* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Green (Duwamish) Bull Trout/Dolly Varden, Run: Unspecified, Status: Unknown |
| Source Record | 8132 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Threatened |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Sockeye | |
|---|---|
| Scientific Name | *Oncorhynchus nerka* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Sockeye Salmon, Run Time: Unknown or not Applicable, Life History: Anadromous |
| Source Record | 41832 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Chum | |
|---|---|
| Scientific Name | *Oncorhynchus keta* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Duwamish/Green Fall Chum, Run: Fall, Status: Unknown |
| Source Record | 2143 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Not Warranted |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Fall Chinook | |
|---|---|
| Scientific Name | *Oncorhynchus tshawytscha* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Chinook Salmon, Run Time: Fall, Life History: Anadromous |
| Source Record | 41829 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Fall Chum | |
|---|---|
| Scientific Name | *Oncorhynchus keta* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Chum Salmon, Run Time: Fall, Life History: Anadromous |
| Source Record | 41830 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Chum | |
|---|---|
| Scientific Name | *Oncorhynchus keta* |
| Priority Area | Occurrence |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Stock Name: Crisp Creek Fall Chum, Run: Fall, Status: Unknown |
| Source Record | 2154 |
| Source Dataset | SASI |
| Source Name | Not Given |
| Source Entity | WDFW Fish Program |
| Federal Status | Not Warranted |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Summer Steelhead | |
|---|---|
| Scientific Name | *Oncorhynchus mykiss* |
| Priority Area | Occurrence/Migration |
| Site Name | Duwamish East Waterway |
| Accuracy | NA |
| Notes | LLID: 1223430475891, Fish Name: Steelhead Trout, Run Time: Summer, Life History: Anadromous |
| Source Record | 41833 |
| Source Dataset | SWIFD |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| More Info | http://wdfw.wa.gov/wlm/diversty/soc/soc.htm |
| Geometry Type | Lines |

| Esturine Zone | |
|---|---|
| Priority Area | Aquatic Habitat |
| Accuracy | 1/4 mile (Quarter Section) |
| Notes | BAY/ESTUARY-COASTAL ZONE ATLAS CODE 54-MODERATELY PROTECTED MARINE EMBAYMENTS WITH FREE CONNECTIONS WITH THE OPEN SEA. BLUFFS, REACH SUBSTRATES MARSHES, EELGRASS BEDS, AND OTHER INTERTIDAL HABITATS ARE ASSOCIATED WITH IT. |
| Source Record | 904754 |
| Source Dataset | PHSREGION |
| Source Name | JOHNSON, TERRY |
| Source Entity | WA Dept. of Fish and Wildlife |
| Federal Status | N/A |
| State Status | N/A |
| PHS Listing Status | PHS Listed Occurrence |
| Sensitive | N |
| SGCN | N |
| Display Resolution | AS MAPPED |
| ManagementRecommendations | http://wdfw.wa.gov/conservation/habitat/planning/ahg/index.html |
| Geometry Type | Polygons |

DISCLAIMER. This report includes information that the Washington Department of Fish and Wildlife (WDFW) maintains in a central computer database. It is not an attempt to provide you with an official agency response as to the impacts of your project on fish and wildlife. This information only documents the location of fish and wildlife resources to the best of our knowledge. It is not a complete inventory and it is important to note that fish and wildlife resources may occur in areas not currently known to WDFW biologists, or in areas for which comprehensive surveys have not been conducted. Site specific surveys are frequently necesssary to rule out the presence of priority resources. Locations of fish and wildlife resources are subject to variation caused by disturbance, changes in season and weather, and other factors. WDFW does not recommend using reports more than six months old.

## Hale, Erin E

**From:** Hale, Erin E
**Sent:** Sunday, October 10, 2021 2:02 PM
**To:** Hale, Erin E
**Subject:** FW: Modernization of Coast Guard Base Seattle: ESA Input from USFWS

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**From:** McReynolds, Ryan <ryan_mcreynolds@fws.gov>
**Sent:** Tuesday, July 13, 2021 5:18 PM
**To:** Dean.J.Amundson@uscg.mil
**Cc:** McReynolds, Ryan <ryan_mcreynolds@fws.gov>; Tanner, Curtis <Curtis_Tanner@fws.gov>; Froschauer, Ann <ann_froschauer@fws.gov>; Thompson, Brad <brad_thompson@fws.gov>; Goldschmidt, Aaron P <aaron.goldschmidt@woodplc.com>; Hale, Erin E <erin.hale@woodplc.com>
**Subject:** Re: Modernization of Coast Guard Base Seattle: ESA Input from USFWS

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

Mr. Amundson,

Thank you for your letter dated July 9.

I can confirm for you, for the purposes of ESA Section 7 consultation and compliance, the species/critical habitat of central focus (FWS jurisdiction) include bull trout, marbled murrelet, and designated critical habitat for bull trout. I can confirm, for all other ESA-listed species/critical habitat occurring in King County (FWS jurisdiction), it is likely that 'no effect' determinations could be made; although, I will emphasize, that is first and foremost a lead federal action agency/USCG decision and determination.

At this location (in this action area), I doubt very much that compliance with the Bald and Golden Eagle Protection Act (BGEPA) will present serious considerations; I would encourage your environmental staff and/or consultants to confer with WDFW about any known nest or roost locations. Our Region 9/Portland Migratory Birds and Habitat Programs Office can offer more specific guidance in the event that site- or project-specific information indicates potential issues.

The Migratory Bird Treaty Act (MBTA) is very broad, and extends protections to most resident and migratory birds; that does not include some/a very few non-native and nuisance species (e.g., European starling). I should emphasize, shoreline infrastructure can be attractive to a variety of species, including swallows, osprey, and cormorants; all are protected by MBTA. If site- or project-specific information indicates the possibility that existing shoreline infrastructure may be 'occupied' by any protected migratory bird (e.g., nesting or roosting swallows, osprey, cormorants, etc.), the USCG will want to plan accordingly, with attention to measures that can be taken to avoid and minimize the possibility of destroying occupied nests, eggs, or chicks. Again, our Region 9/Portland Migratory Birds and Habitat Programs Office can offer more specific guidance in the event that site- or project-specific information indicates potential issues.

Please let me know, if/when questions arise that can be best handled with a brief meeting or conference call. I imagine this is an action of fairly large scope and complexity, so if technical assistance can smooth the

path toward consultation (and completion of consultation), we would want to make time for that (within reason and within staffing constraints).

Please let me know if you have follow-up questions.

Thank You, Regards,

--Ryan--

Ryan McReynolds
Zone Team Supervisor
Coastal, Lowland Aquatics, and Marine Zone
U.S. Fish and Wildlife Service, Lacey WA
**ryan_mcreynolds@fws.gov**
360.753.6047

*Working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people*.

**From:** Goldschmidt, Aaron P <aaron.goldschmidt@woodplc.com>
**Sent:** Monday, July 12, 2021 03:01 PM
**To:** Zablan, Marilet <marilet_zablan@fws.gov>
**Cc:** Amundson (Dean.J.Amundson@uscg.mil) <Dean.J.Amundson@uscg.mil>; Hale, Erin E <erin.hale@woodplc.com>
**Subject:** [EXTERNAL] Modernization of Coast Guard Base Seattle: ESA Input from USFWS.

Greetings Ms. Zablan,

The USCG is proposing to expand and modernize USCG Base Seattle located in Seattle, Washington. The USCG intends to prepare a Programmatic Environmental Impact Statement (PEIS), pursuant to the National Environmental Policy Act (NEPA) and, as part of this process, evaluate the potential to affect species or habitat listed under the Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act (BGEPA), and Marine Mammal Protection Act (MMPA). The USCG has requested information as to ESA-listed species that may be present in the area of a proposed action via IPaC; however, the USCG respectfully request confirmation as to the ESA-listed species and critical habitat that may be expected to occur in the more delineated action area for the proposed modernization of Base Seattle (please see attached). In addition, the USCG respectfully request any assistance you can provide as to other USFWS administered species that may be found in the action area that are protected under the MBTA, BGEPA, or MMPA.

The USCG also respectfully requests your input as to any other protected species managed by USFWS that may be present in the action area, including species protected under the MBTA, BGEPA, and MMPA.

Thank you for your consideration and please contact Dean Amundson (cc'd here) or me if you have any questions.

Thank you in advance for your assistance.

**Aaron Goldschmidt, ENV SP**
Senior Environmental Planning and Permitting Specialist
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101 USA

# Appendix I:
# Tribal Outreach

**U.S. Department of Homeland Security**

**United States Coast Guard**

Commandant
United States Coast Guard

MAIL STOP 7714
2703 Martin Luther King Jr. Ave SE
Washington, DC 20593-7714
Staff Symbol: CG-4D
Phone: 202-475-5555
Fax: 202-475-5959

5090

22 July 2021

The Honorable Robert de los Angeles
Chairperson, Snoqualmie Indian Tribe
9571 Ethan Wade Way SE
Snoqualmie, WA 98065

Dear Chairperson de los Angeles:

The United States Coast Guard (Coast Guard) is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. The Coast Guard respectfully requests that the Snoqualmie Indian Tribe enter into formal government-to-government consultation with the Coast Guard for our proposed modernization of Base Seattle, in accordance with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* and the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* dated January 26, 2021.

Coast Guard Base Seattle, located on the Duwamish Waterway south of downtown Seattle, is the largest Coast Guard facility in the Pacific Northwest. It provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several large Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard statutory missions. In addition, the replacement of current Coast Guard polar ice breaker fleet with new Polar Security Cutters, as well as possible future homeporting of other major cutters, mean there is a need to provide facility enhancements at Base Seattle to support these advanced operating assets.

The Coast Guard is proposing to acquire land and make improvements at Base Seattle over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

Pursuant to the National Environmental Policy Act (NEPA), the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate potential effects on the environment of the proposed modernization project. In addition to government-to-government consultation, the Coast Guard invites any input from the Snoqualmie Indian Tribe as part of the NEPA process. The Coast Guard issued a Notice of Intent to prepare the PEIS on May 7 and thus began soliciting input from all interested parties to help define the scope of the PEIS, including data sources, environmental resources, potential impacts, or additional alternatives that should be

considered. More information on the proposed modernization action can be found on our virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

In addition to and as part of the NEPA process, the Coast Guard will address compliance with the National Historic Preservation Act of 1966 (NHPA) (54 USC § 300101 *et seq.*) and the implementing regulations (36 CFR §800) for the proposed modernization at Base Seattle. The Coast Guard therefore respectfully invites the Snoqualmie Indian Tribe to consult with the Coast Guard pursuant to Section 106 of NHPA. As part of this process, we respectfully request any information on any historic or cultural resources that may be located on or adjacent to Base Seattle, or properties that may hold traditional religious or cultural significance to the Snoqualmie Indian Tribe, that could be affected by the proposed modernization project. In addition, if applicable, we request assistance in developing any measures or alternatives that would avoid, minimize, or mitigate any adverse effects.

Lastly, Slip 36 at Base Seattle is within the boundaries of the Harbor Island Superfund Site and, as such, any work in this area may necessarily be conducted under the authorities of the U.S. Environmental Protection Agency (EPA). The Coast Guard intends to enter into an agreement with the EPA regarding removal of contaminated sediment and source material in Slip 36. While these discussions have not yet resulted in an agreement or a defined process for removal of contamination, the Coast Guard expects that the EPA, in conjunction with the Coast Guard, would seek government-to-government consultation with the Snoqualmie Indian Tribe as part of any such process.

The Coast Guard values and embraces our trust responsibility to the Snoqualmie Indian Tribe and we look forward to working collaboratively on our proposed modernization project at Base Seattle. Mr. Andy Connor will be the Coast Guard's primary liaison with the Snoqualmie Indian Tribe for facilitating this consultation, with the support of a number of other technical staff. Mr. Connor can be reached at (206) 220-7235 or via e-mail at Andrew.W.Connor@uscg.mil. Thank you for your consideration to this matter.

Sincerely,

CAPT USCG

Patrick J. Dugan, P.E.
Captain, U.S. Coast Guard
Chief, Office of Civil Engineering

**U.S. Department of Homeland Security**

**United States Coast Guard**

Commandant
United States Coast Guard

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5090

22 July 2021

The Honorable Delano Saluskin
Chairman, Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

Dear Chairman Saluskin:

The United States Coast Guard (Coast Guard) is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. The Coast Guard respectfully requests that the Yakama Nation enter into formal government-to-government consultation with the Coast Guard for our proposed modernization of Base Seattle, in accordance with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* and the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* dated January 26, 2021.

Coast Guard Base Seattle, located on the Duwamish Waterway south of downtown Seattle, is the largest Coast Guard facility in the Pacific Northwest. It provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several large Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard statutory missions. In addition, the replacement of current Coast Guard polar ice breaker fleet with new Polar Security Cutters, as well as possible future homeporting of other major cutters, mean there is a need to provide facility enhancements at Base Seattle to support these advanced operating assets.

The Coast Guard is proposing to acquire land and make improvements at Base Seattle over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

Pursuant to the National Environmental Policy Act (NEPA), the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate potential effects on the environment of the proposed modernization project. In addition to government-to-government consultation, the Coast Guard invites any input from the Yakama Nation as part of the NEPA process. The Coast Guard issued a Notice of Intent to prepare the PEIS on May 7 and thus began soliciting input from all interested parties to help define the scope of the PEIS, including data sources, environmental resources, potential impacts, or additional alternatives that should be

considered. More information on the proposed modernization action can be found on our virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

In addition to and as part of the NEPA process, the Coast Guard will address compliance with the National Historic Preservation Act of 1966 (NHPA) (54 USC § 300101 *et seq.*) and the implementing regulations (36 CFR §800) for the proposed modernization at Base Seattle. The Coast Guard therefore respectfully invites the Yakama Nation to consult with the Coast Guard pursuant to Section 106 of NHPA. As part of this process, we respectfully request any information on any historic or cultural resources that may be located on or adjacent to Base Seattle, or properties that may hold traditional religious or cultural significance to the Yakama Nation, that could be affected by the proposed modernization project. In addition, if applicable, we request assistance in developing any measures or alternatives that would avoid, minimize, or mitigate any adverse effects.

Lastly, Slip 36 at Base Seattle is within the boundaries of the Harbor Island Superfund Site and, as such, any work in this area may necessarily be conducted under the authorities of the U.S. Environmental Protection Agency (EPA). The Coast Guard intends to enter into an agreement with the EPA regarding removal of contaminated sediment and source material in Slip 36. While these discussions have not yet resulted in an agreement or a defined process for removal of contamination, the Coast Guard expects that the EPA, in conjunction with the Coast Guard, would seek government-to-government consultation with the Yakama Nation as part of any such process.

The Coast Guard values and embraces our trust responsibility to the Yakama Nation and we look forward to working collaboratively on our proposed modernization project at Base Seattle. Mr. Andy Connor will be the Coast Guard's primary liaison with the Yakama Nation for facilitating this consultation, with the support of a number of other technical staff. Mr. Connor can be reached at Andrew.W.Connor@uscg.mil. Thank you for your consideration to this matter.

Sincerely,

CAPT USCG

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22 July 2021

The Honorable Teri Gobin
Chairwoman, Tulalip Tribes Board of Directors
6406 Marine Drive
Tulalip, WA 98271

Dear Chairman Gobin:

The United States Coast Guard (Coast Guard) is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. The Coast Guard respectfully requests that the Tulalip Tribes enter into formal government-to-government consultation with the Coast Guard for our proposed modernization of Base Seattle, in accordance with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* and the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* dated January 26, 2021.

Coast Guard Base Seattle, located on the Duwamish Waterway south of downtown Seattle, is the largest Coast Guard facility in the Pacific Northwest. It provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several large Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard statutory missions. In addition, the replacement of current Coast Guard polar ice breaker fleet with new Polar Security Cutters, as well as possible future homeporting of other major cutters, mean there is a need to provide facility enhancements at Base Seattle to support these advanced operating assets.

The Coast Guard is proposing to acquire land and make improvements at Base Seattle over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

Pursuant to the National Environmental Policy Act (NEPA), the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate potential effects on the environment of the proposed modernization project. In addition to government-to-government consultation, the Coast Guard invites any input from the Tulalip Tribes as part of the NEPA process. The Coast Guard issued a Notice of Intent to prepare the PEIS on May 7 and thus began soliciting input from all interested parties to help define the scope of the PEIS, including data sources, environmental resources, potential impacts, or additional alternatives that should be

considered. More information on the proposed modernization action can be found on our virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

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Lastly, Slip 36 at Base Seattle is within the boundaries of the Harbor Island Superfund Site and, as such, any work in this area may necessarily be conducted under the authorities of the U.S. Environmental Protection Agency (EPA). The Coast Guard intends to enter into an agreement with the EPA regarding removal of contaminated sediment and source material in Slip 36. While these discussions have not yet resulted in an agreement or a defined process for removal of contamination, the Coast Guard expects that the EPA, in conjunction with the Coast Guard, would seek government-to-government consultation with the Tulalip Tribes as part of any such process.

The Coast Guard values and embraces our trust responsibility to the Tulalip Tribes and we look forward to working collaboratively on our proposed modernization project at Base Seattle. Mr. Andy Connor will be the Coast Guard's primary liaison with the Tulalip Tribes for facilitating this consultation, with the support of a number of other technical staff. Mr. Connor can be reached at Andrew.W.Connor@uscg.mil. Thank you for your consideration to this matter.

Sincerely,

CAPT USCG

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20 May 2021

The Honorable Jaison Elkins
Tribal Chair, Muckleshoot Tribe
39015 172nd Avenue SE
Auburn, WA 98092

Dear Chairman Elkins:

The United States Coast Guard (Coast Guard) is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. The Coast Guard respectfully requests that the Muckleshoot Tribe enter into formal government-to-government consultation with the Coast Guard for our proposed modernization of Base Seattle, in accordance with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* and the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* dated January 26, 2021.

Coast Guard Base Seattle, located on the Duwamish Waterway south of downtown Seattle, is the largest Coast Guard facility in the Pacific Northwest. It provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several large Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard statutory missions. In addition, the replacement of current Coast Guard polar ice breaker fleet with new Polar Security Cutters, as well as possible future homeporting of other major cutters, mean there is a need to provide facility enhancements at Base Seattle to support these advanced operating assets.

The Coast Guard is proposing to acquire land and make improvements at Base Seattle over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

Pursuant to the National Environmental Policy Act (NEPA), the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate potential effects on the environment of the proposed modernization project. In addition to government-to-government consultation, the Coast Guard invites any input from the Muckleshoot Tribe as part of the NEPA process. The Coast Guard issued a Notice of Intent to prepare the PEIS on May 7 and thus began soliciting input from all interested parties to help define the scope of the PEIS, including data sources, environmental resources, potential impacts, or additional alternatives that should be

considered. More information on the proposed modernization action, and the means to provide input, can be found on our virtual scoping space at https://virtual.woodplc.com/VirtualSpace/102907.

In addition to and as part of the NEPA process, the Coast Guard will address compliance with the National Historic Preservation Act of 1966 (NHPA) (54 USC § 300101 *et seq.*) and the implementing regulations (36 CFR §800) for the proposed modernization at Base Seattle. The Coast Guard therefore respectfully invites the Muckleshoot Tribe to consult with the Coast Guard pursuant to Section 106 of NHPA. As part of this process, we respectfully request any information on any historic or cultural resources that may be located on or adjacent to Base Seattle, or properties that may hold traditional religious or cultural significance to the Muckleshoot Tribe, that could be affected by the proposed modernization project. In addition, if applicable, we request assistance in developing any measures or alternatives that would avoid, minimize, or mitigate any adverse effects.

Lastly, Slip 36 at Base Seattle is within the boundaries of the Harbor Island Superfund Site and, as such, any work in this area may necessarily be conducted under the authorities of the U.S. Environmental Protection Agency (EPA). The Coast Guard intends to enter into an agreement with the EPA regarding removal of contaminated sediment and source material in Slip 36. While these discussions have not yet resulted in an agreement or a defined process for removal of contamination, the Coast Guard expects that the EPA, in conjunction with the Coast Guard, would seek government-to-government consultation with the Muckleshoot Tribe as part of any such process.

Our staffs have already had initial discussions on April 27, 2021 to discuss the modernization project. The Coast Guard values and embraces our trust responsibility to the Muckleshoot Tribe and we look forward to working collaboratively on our proposed modernization project at Base Seattle.

Mr. Andy Conner will continue to be the Coast Guard's primary liaison with the Muckleshoot Tribe for facilitating this consultation, with the support of a number of other technical staff. Mr. Conner can be reached at (206) 220-7235. Thank you for your consideration to this matter.

Sincerely,

CAPT

Patrick J. Dugan, P.E.
Captain, U.S. Coast Guard
Chief, Office of Civil Engineering

Cc:

U.S. Department of Homeland Security
United States Coast Guard

Commandant
United States Coast Guard

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5090

18 May 2021

The Honorable Leonard Forsman
Chairman, Suquamish Tribal Council
P.O. Box 498
Suquamish, WA 98392

Dear Chairman Forsman:

The United States Coast Guard (Coast Guard) is proposing to expand and modernize Coast Guard Base Seattle in Seattle, Washington. The Coast Guard respectfully requests that the Suquamish Tribe enter into formal government-to-government consultation with the Coast Guard for our proposed modernization of Base Seattle, in accordance with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* and the Presidential *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* dated January 26, 2021.

Coast Guard Base Seattle, located on the Duwamish Waterway south of downtown Seattle, is the largest Coast Guard facility in the Pacific Northwest. It provides a full range of support functions for vessels and Coast Guard missions in the Pacific Northwest and Polar areas of operation, and serves as the homeport for several large Coast Guard cutters. There are currently substantial deficiencies in facilities and infrastructure at Base Seattle that hinder the efficient execution of Coast Guard statutory missions. In addition, the replacement of current Coast Guard polar ice breaker fleet with new Polar Security Cutters, as well as possible future homeporting of other major cutters, mean there is a need to provide facility enhancements at Base Seattle to support these advanced operating assets.

The Coast Guard is proposing to acquire land and make improvements at Base Seattle over approximately the next 10 years to resolve incompatible land uses, provide new infrastructure, increase berthing capacity, upgrade existing facilities and infrastructure, reduce congestion and parking shortfalls, provide a safer work environment, and enhance physical security capabilities.

Pursuant to the National Environmental Policy Act (NEPA), the Coast Guard intends to prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate potential effects on the environment of the proposed modernization project. In addition to government-to-government consultation, the Coast Guard invites any input from the Suquamish Tribe as part of the NEPA process. The Coast Guard issued a Notice of Intent to prepare the PEIS on May 7 and thus began soliciting input from all interested parties to help define the scope of the PEIS, including data sources, environmental resources, potential impacts, or additional alternatives that should be

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Lastly, Slip 36 at Base Seattle is within the boundaries of the Harbor Island Superfund Site and, as such, any work in this area may necessarily be conducted under the authorities of the U.S. Environmental Protection Agency (EPA). The Coast Guard intends to enter into an agreement with the EPA regarding removal of contaminated sediment and source material in Slip 36. While these discussions have not yet resulted in an agreement or a defined process for removal of contamination, the Coast Guard expects that the EPA, in conjunction with the Coast Guard, would seek government-to-government consultation with the Suquamish Tribe as part of any such process.

Our staffs have already had initial discussions about the modernization project, and we appreciate Ms. Alison O'Sullivan of the Suquamish tribal staff meeting with Coast Guard staff on April 29, 2021 to discuss the modernization project. The Coast Guard values and embraces our trust responsibility to the Suquamish Tribe and we look forward to working collaboratively on our proposed modernization project at Base Seattle.

Mr. Andy Conner will continue to be the Coast Guard's primary liaison with the Suquamish Tribe for facilitating this consultation, with the support of a number of other technical staff. Mr. Conner can be reached at (206) 220-7235. Thank you for your consideration to this matter.

Sincerely,

CAPT

Patrick J. Dugan, P.E.
Captain, U.S. Coast Guard
Chief, Office of Civil Engineering

Cc: Ms. Alison O'Sullivan - Suquamish Tribe, Senior Biologist

# Appendix J:
# Air Emissions Modeling

**Annual Fugitive Dust Emissions For Demolition and New Construction (2006 USEPA Standards)**

| FY | Total Disturbed Acreage | $PM_{10}$ Emissions Factor* | $PM_{10}$ Emissions per Month | $PM_{10}$ Emissions per Year | $PM_{2.5}$ Emissions per Year | Total Fugitive Dust Emissions ($PM_{10}$ & $PM_{2.5}$) | Emissions after Implementation of BMPs |
|---|---|---|---|---|---|---|---|
| 2023 | 0.00 | 0.42 | 0.0 | 0.0 | 0.00 | 0.00 | 0.00 |
| 2024 | 0.75 | 0.42 | 0.3 | 3.8 | 0.38 | 4.16 | 2.08 |
| 2025 | 2.75 | 0.42 | 1.2 | 13.9 | 1.39 | 15.25 | 7.62 |
| 2026 | 10.75 | 0.42 | 4.5 | 54.2 | 5.42 | 59.60 | 29.80 |
| 2027 | 10.25 | 0.42 | 4.3 | 51.7 | 5.17 | 56.83 | 28.41 |
| 2028 | 14.75 | 0.42 | 6.2 | 74.3 | 7.43 | 81.77 | 40.89 |
| 2029 | 3.75 | 0.42 | 1.6 | 18.9 | 1.89 | 20.79 | 10.40 |
| 2030 | 0.00 | 0.42 | 0.0 | 0.0 | 0.00 | 0.00 | 0.00 |
| 2031 | 0.00 | 0.42 | 0.0 | 0.0 | 0.00 | 0.00 | 0.00 |
| 2032 | 0.00 | 0.42 | 0.0 | 0.0 | 0.00 | 0.00 | 0.00 |
| 2033 | 0.00 | 0.42 | 0.0 | 0.0 | 0.00 | 0.00 | 0.00 |

Source: MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1).* Midwest Research Institue (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996; USEPA 2001. Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999. EPA 454/R-01-006. Office of Air Quality Planning and Standards, March 2001; USEPA 2006. Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants. Prepared for: Emissions Inventory and Analysis Group (C339-02), July 2006.

Notes: General Construction Activites Emission Factor = 0.19 ton $PM_{10}$ per acre-month; New Road Construction Emission Factor = 0.42 ton $PM_{10}$ per acre-month; $PM_{2.5}$ emissions are estimated by applying a particle size multiplier of 0.10 to $PM_{10}$ emissions (USEPA 2006); The USEPA National Emission Inventory documentation recommends a control efficiency of 50% for $PM_{10}$ and $PM_{2.5}$ in PM nonattainment areas (USEPA 2006).

# CONSTRUCTION

## Table J-1

| Annual Construction Equipment Emissions | | | | | | | | Emission Factors (lb/hr) |
|---|---|---|---|---|---|---|---|---|
| Equipment | Hours | ROG | CO | $NO_x$ | $SO_x$ | PM | $CO_2$ | $CH_4$ |
| Aerial Lifts Composit | 1920 | 0.0238 | 0.1677 | 0.1726 | 0.0004 | 0.0080 | 34.7 | 0.0021 |
| Air Compressors Composit | 1920 | 0.0442 | 0.3051 | 0.2928 | 0.0007 | 0.0158 | 63.6 | 0.0040 |
| Cement and Mortar Mixers Composite | 1920 | 0.0086 | 0.0415 | 0.0535 | 0.0001 | 0.0021 | 7.2 | 0.0008 |
| Concrete/Industrial Saws Composite | 1920 | 0.0444 | 0.3761 | 0.3176 | 0.0007 | 0.0171 | 58.5 | 0.0040 |
| Cranes Composite | 1920 | 0.0846 | 0.3865 | 0.6033 | 0.0014 | 0.0229 | 129 | 0.0076 |
| Crushing/Proc. Equipment Composite | 1920 | 0.0872 | 0.6224 | 0.5412 | 0.0015 | 0.0270 | 132 | 0.0079 |
| Dumpers/Tenders Composite | 1920 | 0.0092 | 0.0314 | 0.0581 | 0.0001 | 0.0022 | 7.6 | 0.0008 |
| Excavators Composite | 1920 | 0.0687 | 0.5113 | 0.3577 | 0.0013 | 0.0158 | 120 | 0.0062 |
| Forklifts Composite | 1920 | 0.0294 | 0.2148 | 0.1459 | 0.0006 | 0.0056 | 54.4 | 0.0027 |
| Generator Sets Composite | 1920 | 0.0363 | 0.2708 | 0.2978 | 0.0007 | 0.0131 | 61.0 | 0.0033 |
| Graders Composite | 1920 | 0.1394 | 0.6413 | 0.9902 | 0.0017 | 0.0459 | 151 | 0.0126 |
| Off-Highway Trucks Composite | 1920 | 0.1394 | 0.6413 | 0.9902 | 0.0017 | 0.0459 | 151 | 0.0126 |
| Other Construction Equipment Composite | 1920 | 0.0534 | 0.3497 | 0.3120 | 0.0013 | 0.0121 | 122 | 0.0048 |
| Paving Equipment Composite | 1920 | 0.0710 | 0.4062 | 0.4462 | 0.0008 | 0.0288 | 68.9 | 0.0064 |
| Rollers Composite | 1920 | 0.0540 | 0.3816 | 0.3483 | 0.0008 | 0.0206 | 67.0 | 0.0049 |
| Rubber Tired Dozers Composite | 1920 | 0.2015 | 0.7661 | 1.4661 | 0.0025 | 0.0582 | 239 | 0.0182 |
| Rubber Tired Loaders Composite | 1920 | 0.0705 | 0.4381 | 0.4275 | 0.0012 | 0.0206 | 109 | 0.0064 |
| Scrapers Composite | 1920 | 0.1815 | 0.7745 | 1.2263 | 0.0027 | 0.0492 | 262 | 0.0164 |
| Trenchers Composite | 1920 | 0.0874 | 0.4226 | 0.4327 | 0.0007 | 0.0309 | 58.7 | 0.0079 |
| Tractors/Loaders/Backhoes Composite | 1920 | 0.0407 | 0.3606 | 0.2506 | 0.0008 | 0.0113 | 66.8 | 0.0037 |
| Welders Composite | 1920 | 0.0280 | 0.1788 | 0.1635 | 0.0003 | 0.0088 | 25.6 | 0.0025 |

(Table J-1 continued on next page)

**Table J-1 (continued)**

| Annual Construction Equipment Emissions | | Emissions (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Equipment** | **Hours** | **ROG** | **CO** | **$NO_x$** | **$SO_x$** | **PM** | **$CO_2$** | **$CH_4$** |
| Aerial Lifts Composit | 1920 | 0.023 | 0.161 | 0.166 | 0.000 | 0.008 | 33.333 | 0.002 |
| Air Compressors Composit | 1920 | 0.042 | 0.293 | 0.281 | 0.001 | 0.015 | 61.063 | 0.004 |
| Cement and Mortar Mixers Composite | 1920 | 0.008 | 0.040 | 0.051 | 0.000 | 0.002 | 6.958 | 0.001 |
| Concrete/Industrial Saws Composite | 1920 | 0.043 | 0.361 | 0.305 | 0.001 | 0.016 | 56.125 | 0.004 |
| Cranes Composite | 1920 | 0.081 | 0.371 | 0.579 | 0.001 | 0.022 | 123.486 | 0.007 |
| Crushing/Proc. Equipment Composite | 1920 | 0.084 | 0.597 | 0.520 | 0.001 | 0.026 | 127.016 | 0.008 |
| Dumpers/Tenders Composite | 1920 | 0.009 | 0.030 | 0.056 | 0.000 | 0.002 | 7.319 | 0.001 |
| Excavators Composite | 1920 | 0.066 | 0.491 | 0.343 | 0.001 | 0.015 | 114.796 | 0.006 |
| Forklifts Composite | 1920 | 0.028 | 0.206 | 0.140 | 0.001 | 0.005 | 52.220 | 0.003 |
| Generator Sets Composite | 1920 | 0.035 | 0.260 | 0.286 | 0.001 | 0.013 | 58.553 | 0.003 |
| Graders Composite | 1920 | 0.134 | 0.616 | 0.951 | 0.002 | 0.044 | 145.343 | 0.012 |
| Off-Highway Trucks Composite | 1920 | 0.134 | 0.616 | 0.951 | 0.002 | 0.044 | 145.343 | 0.012 |
| Other Construction Equipment Composite | 1920 | 0.051 | 0.336 | 0.299 | 0.001 | 0.012 | 117.598 | 0.005 |
| Paving Equipment Composite | 1920 | 0.068 | 0.390 | 0.428 | 0.001 | 0.028 | 66.181 | 0.006 |
| Rollers Composite | 1920 | 0.052 | 0.366 | 0.334 | 0.001 | 0.020 | 64.357 | 0.005 |
| Rubber Tired Dozers Composite | 1920 | 0.193 | 0.735 | 1.407 | 0.002 | 0.056 | 229.520 | 0.017 |
| Rubber Tired Loaders Composite | 1920 | 0.068 | 0.421 | 0.410 | 0.001 | 0.020 | 104.266 | 0.006 |
| Scrapers Composite | 1920 | 0.174 | 0.744 | 1.177 | 0.003 | 0.047 | 251.985 | 0.016 |
| Trenchers Composite | 1920 | 0.084 | 0.406 | 0.415 | 0.001 | 0.030 | 56.364 | 0.008 |
| Tractors/Loaders/Backhoes Composite | 1920 | 0.039 | 0.346 | 0.241 | 0.001 | 0.011 | 64.127 | 0.004 |
| Welders Composite | 1920 | 0.027 | 0.172 | 0.157 | 0.000 | 0.008 | 24.579 | 0.002 |
| | **Total** | **1.443** | **7.957** | **9.498** | **0.021** | **0.443** | **1910.533** | **0.130** |

Source: SCAQMD 2021. SCAB Off-Road Mobile Source Emission Factors (Scenario Years 2007 - 2025) - 2021 Sheet.
Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors.
Notes: Construction assumed to occur for 8 months, 5 days per week, 8 hours per day.

**Table J-2**

| Annual Materials Delivery and Demolition Debris Export | | | | | | | | | Emission Factors (lb/mi) |
|---|---|---|---|---|---|---|---|---|---|
| | **Activity** | **Mileage** | **ROG** | **CO** | **$NO_x$** | **$SO_x$** | **PM** | **$CO_2$** | **$CH_4$** |
| 2023 | Heavy Haul Truck Trips | 0 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2024 | | 352000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2025 | | 1312000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2026 | | 256000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2027 | | 96000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2028 | | 2176000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2029 | | 1600000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2030 | | 1280000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2031 | | 160000 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2032 | | 0 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| 2033 | | 0 | 0.0012 | 0.0075 | 0.0077 | 0.0000 | 0.0006 | 2.8643 | 0.0000 |
| | | | | | | | | | Emissions (tons/year) |
| | **Activity** | **Mileage** | **ROG** | **CO** | **$NO_x$** | **$SO_x$** | **PM** | **$CO_2$** | **$CH_4$** |
| 2023 | Heavy Haul Truck Trips | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| 2024 | | 352000 | 0.203 | 1.317 | 1.361 | 0.005 | 0.103 | 504.124 | 0.009 |
| 2025 | | 1312000 | 0.758 | 4.909 | 5.074 | 0.018 | 0.383 | 1879.008 | 0.032 |
| 2026 | | 256000 | 0.148 | 0.958 | 0.990 | 0.004 | 0.075 | 366.636 | 0.006 |
| 2027 | | 96000 | 0.055 | 0.359 | 0.371 | 0.001 | 0.028 | 137.488 | 0.002 |
| 2028 | | 2176000 | 1.257 | 8.142 | 8.416 | 0.030 | 0.636 | 3116.404 | 0.053 |
| 2029 | | 1600000 | 0.925 | 5.986 | 6.188 | 0.022 | 0.468 | 2291.473 | 0.039 |
| 2030 | | 1280000 | 0.740 | 4.789 | 4.950 | 0.018 | 0.374 | 1833.179 | 0.031 |
| 2031 | | 160000 | 0.092 | 0.599 | 0.619 | 0.002 | 0.047 | 229.147 | 0.004 |
| 2032 | | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| 2033 | | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |

Source: SCAQMD 2021. Emission Factors for On-Rad Vehicles (Scenario Years 2007-2026) - 2020 Sheet.
Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road).
Notes: Assuming a 200-mile round trip per heavy haul truck trip during the 8-month construction period. Assuming 2 trips per day, 5 days per week throughout the 8-month construction period.

**Table J-3**

| Annual Construction Worker Commute Emissions | | | | | | | | | Emission Factors (lb/mi) |
|---|---|---|---|---|---|---|---|---|---|
| | **Activity** | **Mileage** | **ROG** | **CO** | **$NO_x$** | **$SO_x$** | **PM** | **$CO_2$** | **$CH_4$** |
| 2023 | Construction Worker Commute (per employee) | 0 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2024 | | 272000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2025 | | 280000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2026 | | 288000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2027 | | 1240000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2028 | | 1480000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2029 | | 760000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2030 | | 552000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2031 | | 48000 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2032 | | 0 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |
| 2033 | | 0 | 0.0005 | 0.0042 | 0.0004 | 0.0000 | 0.0002 | 1.1101 | 0.0000 |

| Annual Construction Worker Commute Emissions | | | | | | | | | Emissions (tons/year) |
|---|---|---|---|---|---|---|---|---|---|
| | **Activity** | **Mileage** | **ROG** | **CO** | **$NO_x$** | **$SO_x$** | **PM** | **$CO_2$** | **$CH_4$** |
| 2023 | Construction Worker Commute (per employee) | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| 2024 | | 272000 | 0.069 | 0.573 | 0.051 | 0.001 | 0.022 | 150.973 | 0.006 |
| 2025 | | 280000 | 0.071 | 0.590 | 0.053 | 0.002 | 0.022 | 155.413 | 0.006 |
| 2026 | | 288000 | 0.073 | 0.607 | 0.054 | 0.002 | 0.023 | 159.854 | 0.006 |
| 2027 | | 1240000 | 0.314 | 2.612 | 0.234 | 0.007 | 0.099 | 688.259 | 0.027 |
| 2028 | | 1480000 | 0.374 | 3.117 | 0.279 | 0.008 | 0.118 | 821.471 | 0.032 |
| 2029 | | 760000 | 0.192 | 1.601 | 0.143 | 0.004 | 0.061 | 421.836 | 0.016 |
| 2030 | | 552000 | 0.140 | 1.163 | 0.104 | 0.003 | 0.044 | 306.386 | 0.012 |
| 2031 | | 48000 | 0.012 | 0.101 | 0.009 | 0.000 | 0.004 | 26.642 | 0.001 |
| 2032 | | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| 2033 | | 0 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |

Source: SCAQMD 2021. Emission Factors for On-Rad Vehicles (Scenario Years 2007-2026) - 2021 Sheet.
Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road).
Notes: Assuming a 50-mile round trip per employee during the 8-month construction period and 75 employees.

# OPERATIONS

## Table J-4

| Personnel Commute Emissions | | | | | | | | Emission Factors (lb/mi) | |
|---|---|---|---|---|---|---|---|---|---|
| Year | Activity | Mileage | ROG | CO | $NO_x$ | $SO_x$ | PM | $CO_2$ | $CH_4$ |
| 2022 | Personnel Commute (per employee) | 13,680,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2023 | | 9,900,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2024 | | 9,900,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2025 | | 12,000,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2026 | | 22,260,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2027 | | 25,260,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2028 | | 27,060,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2029 | | 27,060,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2030 | | 25,860,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2031 | | 30,060,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2032 | | 31,260,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |
| 2033 | | 31,260,000 | 0.001 | 0.004 | 0.000 | 0.000 | 0.000 | 1.110 | 0.000 |

| Personnel Commute Emissions | | | | | | | | Emissions (tons/year) | |
|---|---|---|---|---|---|---|---|---|---|
| Year | Activity | Mileage | ROG | CO | $NO_x$ | $SO_x$ | PM | $CO_2$ | $CH_4$ |
| 2022 | Personnel Commute (per employee) | 13,680,000 | 3.459 | 28.811 | 2.583 | 0.073 | 1.095 | 7593.054 | 0.296 |
| 2023 | | 9,900,000 | 2.503 | 20.850 | 1.869 | 0.053 | 0.792 | 5494.973 | 0.214 |
| 2024 | | 9,900,000 | 2.503 | 20.850 | 1.869 | 0.053 | 0.792 | 5494.973 | 0.214 |
| 2025 | | 12,000,000 | 3.034 | 25.273 | 2.265 | 0.064 | 0.960 | 6660.574 | 0.259 |
| 2026 | | 22,260,000 | 5.629 | 46.882 | 4.202 | 0.119 | 1.781 | 12355.364 | 0.481 |
| 2027 | | 25,260,000 | 6.387 | 53.200 | 4.769 | 0.135 | 2.021 | 14020.507 | 0.546 |
| 2028 | | 27,060,000 | 6.843 | 56.991 | 5.108 | 0.145 | 2.165 | 15019.593 | 0.585 |
| 2029 | | 27,060,000 | 6.843 | 56.991 | 5.108 | 0.145 | 2.165 | 15019.593 | 0.585 |
| 2030 | | 25,860,000 | 6.539 | 54.463 | 4.882 | 0.139 | 2.069 | 14353.536 | 0.559 |
| 2031 | | 30,060,000 | 7.601 | 63.309 | 5.675 | 0.161 | 2.405 | 16684.737 | 0.650 |
| 2032 | | 31,260,000 | 7.905 | 65.836 | 5.901 | 0.168 | 2.501 | 17350.794 | 0.676 |
| 2033 | | 31,260,000 | 7.905 | 65.836 | 5.901 | 0.168 | 2.501 | 17350.794 | 0.676 |
| | | **Total** | **67.151** | **559.293** | **50.133** | **1.424** | **21.250** | **147398.492** | **5.739** |

Source: SCAQMD 2021. Emission Factors for On-Road Vehicles (Scenario Years 2007-2026) - 2021 Sheet.
Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road).
Notes: Assuming a 50-mile round trip per employee.

# Appendix K:
# Socioeconomic and Environmental Justice Supporting Data

# TOTAL PORT CARGO EFFECTS

**TABLE 1**

| Economic Impacts of the NWSA Total Marine Cargo (Container/Auto/Breakbulk) Activities, Washington 2017 | | | | |
|---|---|---|---|---|
| | Direct | Indirect | Induced | Total |
| Jobs | 20,100 | 14,700 | 23,600 | 58,400 |
| Total Compensation ( 2017 $M) | $1,902.7 | $872.1 | $1,243.7 | $4,018.5 |
| Business Output ( 2017 $M) | $5,858.7 | $2,856.6 | $3,670.2 | $12,385.5 |
| Sources: WA State Office of Financial Management (2017); Community Attributes Inc. (2019) | | | | |

**TABLE 2**

| Containerized Cargo Economic Impacts of the NWSA Marine Cargo Activities, Washington 2017 | | | |
|---|---|---|---|
| | Direct | Secondary (Indirect/Induced) | Total |
| Jobs | 14,890 | 30,610 | 45,500 |
| Total Compensation (2017 $M) | $1,500 | $1,700 | $3,200 |
| Business Output (2017 $M) | $4,500 | $5,200 | $9,700 |
| Sources: WA State Office of Financial Management (2017); Community Attributes Inc. (2019) | | | |

**TABLE 3**

| Total Containerized Cargo, 2017 | |
|---|---|
| Twenty-foot equivalents (TEUs) | 3,700,000 |
| Metric Tons - Containerized | 26,100,000 |
| Sources: WA State Office of Financial Management (2017); Community Attributes Inc. (2019) | |

Tables 1 through 6 provide categorized information on 2017 levels of Port operations. The information in these tables is used in Tables 7 through 15 to calculate projected impacts due to potential Coast Guard land acquisition at Terminal 30 and/ or 46.

**TABLE 4**

| Jobs/Payroll/Revenue Per Containerized Cargo TEU (2017) | |
|---|---|
| Direct Jobs/TEU | 0.0040 |
| Secondary Jobs/TEU | 0.0083 |
| Direct Payroll/TEU | $405.41 |
| Secondary Payroll/TEU | $459.46 |
| Direct Revenue/TEU | $1,216.22 |
| Secondary Revenue/TEU | $1,405.41 |
| Sources: WA State Office of Financial Management (2017); Community Attributes Inc. (2019) | |

**TABLE 5**

| TEU Totals | |
|---|---|
| NWSA Total TEUs (2017) | 3,700,000 |
| Terminal 30 TEU (2017) | 188,635 |
| Terminal 46 TEU (2017) | 324,222 |
| (2017); Community Attributes Inc. (2019); Port of Seattle (2021) | |

# TOTAL PORT CARGO EFFECTS

**TABLE 6**

| Existing Port Cargo Terminal Property | |
|---|---|
| Container Terminal | Acreage |
| East Sitcum | 36.0 |
| Husky | 118.0 |
| Pierce County | 155.0 |
| TOTE Maritime Alaska | 48.0 |
| Washington United | 133.0 |
| West Sitcum | 122.0 |
| T115 | 96.0 |
| T18 | 196.0 |
| T5 | 185.0 |
| T46 | 86.5 |
| T30 | 82.0 |
| Total Container Acreage | 1257.5 |
| Total Port Acreage | 3994.0 |

Tables 7 through 9 provide calculations for the percent reduction in Total Container Terminal and Total Port capacity. The calculated reductions are based on the proposed amount of Coast Guard acquired land at Terminals 30 and/or 46, as appropriate. The numbered Alternatives below are defined in Section 2 of the PEIS. Each of the Alternatives includes multiple options (noted with an "A", "B", or "C" designation) which reflect varying amounts of acquired land as shown in the Table subheaders shaded in gold. These calculated percentages from Tables 7 through 9 are used for additional level of impact calculations in Tables 10 through 12 to calculate Total Port impacts and Tables 13 through 15 to calculate Container Terminal impacts as described below.

**TABLE 7**

| Alternative 1 Acreage Reduction Analysis | | | |
|---|---|---|---|
| **Container Terminal** | **Acreage** | **Reduced Acres** | **% Reduction** |
| **Alternative 1A (Coast Guard Acquires 26 Acres at Terminal 46)** | | | |
| Terminal 46 | 86.5 | 26 | 30.1 |
| Terminal 30 | 82.0 | 0 | 0 |
| Total Container | 1,257.5 | 26 | 2.1 |
| Total Port | 3,994.0 | 26 | 0.7 |
| **Alternative 1B (Coast Guard Acquires 34 Acres at Terminal 46 [26 ac + 8 ac for Bldg 7])** | | | |
| Terminal 46 | 86.5 | 34 | 39.3 |
| Terminal 30 | 82.0 | 0 | 0 |
| Total Container | 1,257.5 | 34 | 2.7 |
| Total Port | 3,994.0 | 34 | 0.9 |
| **Alternative 1C (Coast Guard Acquires 53 Acres at Terminal 46)** | | | |
| Terminal 46 | 86.5 | 53 | 61.3 |
| Terminal 30 | 82.0 | 0 | 0 |
| Total Container | 1,257.5 | 53 | 4.2 |
| Total Port | 3,994.0 | 53 | 1.3 |

# TOTAL PORT CARGO EFFECTS

**TABLE 8**

| Alternative 2 Acreage Reduction Analysis | | | |
|---|---|---|---|
| **Container Terminal** | **Acreage** | **Reduced Acres** | **% Reduction** |
| **Alternative 2A (Coast Guard Acquires 5.5 Acres at Terminal 46 & 13.5 Acres at Terminal 30)** | | | |
| Terminal 46 | 86.5 | 5.5 | 6.4 |
| Terminal 30 | 82.0 | 13.5 | 16.5 |
| Total Container | 1,257.5 | 19.0 | 1.5 |
| Total Port | 3,994.0 | 19.0 | 0.5 |
| **Alternative 2B (Coast G Acquires 5.5 Acres at Terminal 46 & 21.5 Acres at Terminal 30 [13.5 ac + 8 ac for Bldg 7])** | | | |
| Terminal 46 | 86.5 | 5.5 | 6.4 |
| Terminal 30 | 82.0 | 21.5 | 26.2 |
| Total Container | 1,257.5 | 27.0 | 2.1 |
| Total Port | 3,994.0 | 27.0 | 0.7 |

**TABLE 9**

| Alternative 3 Acreage Reduction Analysis | | | |
|---|---|---|---|
| **Container Terminal** | **Acreage** | **Reduced Acres** | **% Reduction** |
| **Alternative 3A (Coast Guard Acquires 21.75 Acres at Terminal 46)** | | | |
| Terminal 46 | 86.5 | 21.75 | 25.1 |
| Terminal 30 | 82.0 | 0 | 0.0 |
| Total Container | 1,257.5 | 21.75 | 1.7 |
| Total Port | 3,994.0 | 21.75 | 0.5 |
| **Alternative 3B (Coast Guard Acquires 29.75 Acres at Terminal 46 [21.75 ac + 8 ac for Bldg 7])** | | | |
| Terminal 46 | 86.5 | 29.75 | 34.4 |
| Terminal 30 | 82.0 | 0 | 0.0 |
| Total Container | 1,257.5 | 29.75 | 2.4 |
| Total Port | 3,994.0 | 29.75 | 0.7 |

# TOTAL PORT CARGO EFFECTS

Tables 10 through 12 calculate reductions in Total Port categories due to Coast Guard acquired land at Terminal 30 and/or 46 as applicable. These reductions represent the impact to Port operations, jobs, payroll, and revenue based on the percent reduction in land acreage calculated in Tables 7 through 9. The results from Tables 10 through 12 are brought forward into Section 7 of the PEIS to determine the magnitude of Socioeconomic impacts based on loss of Total Port capacity due to Coast Guard acquired land. The tables address the alternatives and options as described above for Tables 7 through 9.

**TABLE 10**

| Alternative 1 Total Port Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 1A (+26 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1A)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.7%) | 3,700,000 | 24,086 | 3,675,914 |
| Direct Jobs | 14,890 | 97 | 14,793 |
| Secondary Jobs | 30,610 | 199 | 30,411 |
| Direct Payroll ($M) | $1,500.0 | $9.8 | $1,490.2 |
| Secondary Payroll ($M) | $1,700.0 | $11.1 | $1,688.9 |
| Direct Revenue ($M) | $4,500.0 | $29.3 | $4,470.7 |
| Secondary Revenue ($M) | $5,200.0 | $33.9 | $5,166.1 |
| **Alternative 1B (+34 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1B)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.9%) | 3,700,000 | 31,497 | 3,668,503 |
| Direct Jobs | 14,890 | 127 | 14,763 |
| Secondary Jobs | 30,610 | 261 | 30,349 |
| Direct Payroll ($M) | $1,500.0 | $12.8 | $1,487.2 |
| Secondary Payroll ($M) | $1,700.0 | $14.5 | $1,685.5 |
| Direct Revenue ($M) | $4,500.0 | $38.3 | $4,461.7 |
| Secondary Revenue ($M) | $5,200.0 | $44.3 | $5,155.7 |
| **Alternative 1C (+53 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1C)** | **Projected Total Port Reduced Value** |
| Reduced TEU (1.3%) | 3,700,000 | 49,099 | 3,650,901 |
| Direct Jobs | 14,890 | 198 | 14,692 |
| Secondary Jobs | 30,610 | 406 | 30,204 |
| Direct Payroll ($M) | $1,500.0 | $19.9 | $1,480.1 |
| Secondary Payroll ($M) | $1,700.0 | $22.6 | $1,677.4 |
| Direct Revenue ($M) | $4,500.0 | $59.7 | $4,440.3 |
| Secondary Revenue ($M) | $5,200.0 | $69.0 | $5,131.0 |

# TOTAL PORT CARGO EFFECTS

**TABLE 11**

| Alternative 2 Total Port Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 2A (+5.5 ac at Terminal 46 & 13.5 ac at Terminal 30)** | **2017 Total Port** | **Reduction (based on Table 8 - Alt 2A)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.5%) | 3,700,000 | 17,601 | 3,682,399 |
| Direct Jobs | 14,890 | 71 | 14,819 |
| Secondary Jobs | 30,610 | 146 | 30,464 |
| Direct Payroll ($M) | $1,500.0 | $7.1 | $1,492.9 |
| Secondary Payroll ($M) | $1,700.0 | $8.1 | $1,691.9 |
| Direct Revenue ($M) | $4,500.0 | $21.4 | $4,478.6 |
| Secondary Revenue ($M) | $5,200.0 | $24.7 | $5,175.3 |
| **Alternative 2B (+5.5 ac at Terminal 46 & 21.5 ac at Terminal 30)** | **2017 Total Port** | **Reduction (based on Table 8 - Alt 2B)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.7%) | 3,700,000 | 25,013 | 3,674,987 |
| Direct Jobs | 14,890 | 101 | 14,789 |
| Secondary Jobs | 30,610 | 207 | 30,403 |
| Direct Payroll ($M) | $1,500.0 | $10.1 | $1,489.9 |
| Secondary Payroll ($M) | $1,700.0 | $11.5 | $1,688.5 |
| Direct Revenue ($M) | $4,500.0 | $30.4 | $4,469.6 |
| Secondary Revenue ($M) | $5,200.0 | $35.2 | $5,164.8 |

**TABLE 12**

| Alternative 3 Total Port Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 3A (+21.75 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 9 - Alt 3A)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.5%) | 3,700,000 | 20,149 | 3,679,851 |
| Direct Jobs | 14,890 | 81 | 14,809 |
| Secondary Jobs | 30,610 | 167 | 30,443 |
| Direct Payroll ($M) | $1,500.0 | $8.2 | $1,491.8 |
| Secondary Payroll ($M) | $1,700.0 | $9.3 | $1,690.7 |
| Direct Revenue ($M) | $4,500.0 | $24.5 | $4,475.5 |
| Secondary Revenue ($M) | $5,200.0 | $28.3 | $5,171.7 |
| **Alternative 3B (+29.75 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 9 - Alt 3B)** | **Projected Total Port Reduced Value** |
| Reduced TEU (0.7%) | 3,700,000 | 27,560 | 3,672,440 |
| Direct Jobs | 14,890 | 111 | 14,779 |
| Secondary Jobs | 30,610 | 228 | 30,382 |
| Direct Payroll ($M) | $1,500.0 | $11.2 | $1,488.8 |
| Secondary Payroll ($M) | $1,700.0 | $12.7 | $1,687.3 |
| Direct Revenue ($M) | $4,500.0 | $33.5 | $4,466.5 |
| Secondary Revenue ($M) | $5,200.0 | $38.7 | $5,161.3 |

# TOTAL PORT CARGO EFFECTS

Tables 13 through 15 calculate reductions in Container Terminal Port categories due to Coast Guard acquired land at Terminal 30 and/or 46 as applicable. These reductions represent the impact to Port operations, jobs, payroll, and revenue based on the percent reduction in land acreage calculated in Tables 7 through 9. The results from Tables 10 through 12 are brought forward into Section 7 of the PEIS to determine the magnitude of Socioeconomic impacts based on loss of Total Port capacity due to Coast Guard acquired land. The tables address the alternatives and options as described above for Tables 7 through 9.

**TABLE 13**

| Alternative 1 Total Container Terminal Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 1A (+26 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1A)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (2.1%) | 3,700,000 | 76,501 | 3,623,499 |
| Direct Jobs | 14,890 | 308 | 14,582 |
| Secondary Jobs | 30,610 | 633 | 29,977 |
| Direct Payroll ($M) | $1,500.0 | $31.0 | $1,469.0 |
| Secondary Payroll ($M) | $1,700.0 | $35.1 | $1,664.9 |
| Direct Revenue ($M) | $4,500.0 | $93.0 | $4,407.0 |
| Secondary Revenue ($M) | $5,200.0 | $107.5 | $5,092.5 |
| **Alternative 1B (+34 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1B)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU 2.7%) | 3,700,000 | 100,040 | 3,599,960 |
| Direct Jobs | 14,890 | 403 | 14,487 |
| Secondary Jobs | 30,610 | 828 | 29,782 |
| Direct Payroll ($M) | $1,500.0 | $40.6 | $1,459.4 |
| Secondary Payroll ($M) | $1,700.0 | $46.0 | $1,654.0 |
| Direct Revenue ($M) | $4,500.0 | $121.7 | $4,378.3 |
| Secondary Revenue ($M) | $5,200.0 | $140.6 | $5,059.4 |
| **Alternative 1C (+53 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 7 - Alt 1C)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (4.2%) | 3,700,000 | 155,944 | 3,544,056 |
| Direct Jobs | 14,890 | 628 | 14,262 |
| Secondary Jobs | 30,610 | 1,290 | 29,320 |
| Direct Payroll ($M) | $1,500.0 | $63.2 | $1,436.8 |
| Secondary Payroll ($M) | $1,700.0 | $71.7 | $1,628.3 |
| Direct Revenue ($M) | $4,500.0 | $189.7 | $4,310.3 |
| Secondary Revenue ($M) | $5,200.0 | $219.2 | $4,980.8 |

# TOTAL PORT CARGO EFFECTS

**TABLE 14**

| Alternative 2 Total Container Terminal Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 2A (+5.5 ac at Terminal 46 & 13.5 ac at Terminal 30)** | **2017 Total Port** | **Reduction (based on Table 8 - Alt 2A)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (1.5%) | 3,700,000 | 55,905 | 3,644,095 |
| Direct Jobs | 14,890 | 225 | 14,665 |
| Secondary Jobs | 30,610 | 462 | 30,148 |
| Direct Payroll ($M) | $1,500.0 | $22.7 | $1,477.3 |
| Secondary Payroll ($M) | $1,700.0 | $25.7 | $1,674.3 |
| Direct Revenue ($M) | $4,500.0 | $68.0 | $4,432.0 |
| Secondary Revenue ($M) | $5,200.0 | $78.6 | $5,121.4 |
| **Alternative 2B (+5.5 ac at Terminal 46 & 21.5 ac at Terminal 30)** | **2017 Total Port** | **Reduction (based on Table 8 - Alt 2B)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (2.1%) | 3,700,000 | 79,443 | 3,620,557 |
| Direct Jobs | 14,890 | 320 | 14,570 |
| Secondary Jobs | 30,610 | 657 | 29,953 |
| Direct Payroll ($M) | $1,500.0 | $32.2 | $1,467.8 |
| Secondary Payroll ($M) | $1,700.0 | $36.5 | $1,663.5 |
| Direct Revenue ($M) | $4,500.0 | $96.6 | $4,403.4 |
| Secondary Revenue ($M) | $5,200.0 | $111.7 | $5,088.3 |

**TABLE 15**

| Alternative 3 Total Container Terminal Reductions due to CG Acquired Property | | | |
|---|---|---|---|
| **Alternative 3A (+21.75 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 9 - Alt 3A)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (1.7%) | 3,700,000 | 63,996 | 3,636,004 |
| Direct Jobs | 14,890 | 258 | 14,632 |
| Secondary Jobs | 30,610 | 529 | 30,081 |
| Direct Payroll ($M) | $1,500.0 | $25.9 | $1,474.1 |
| Secondary Payroll ($M) | $1,700.0 | $29.4 | $1,670.6 |
| Direct Revenue ($M) | $4,500.0 | $77.8 | $4,422.2 |
| Secondary Revenue ($M) | $5,200.0 | $89.9 | $5,110.1 |
| **Alternative 3B (+29.75 ac at Terminal 46)** | **2017 Total Port** | **Reduction (based on Table 9 - Alt 3B)** | **Projected Cont. Terminal Reduced Value** |
| Reduced TEU (2.4%) | 3,700,000 | 87,535 | 3,612,465 |
| Direct Jobs | 14,890 | 352 | 14,538 |
| Secondary Jobs | 30,610 | 724 | 29,886 |
| Direct Payroll ($M) | $1,500.0 | $35.5 | $1,464.5 |
| Secondary Payroll ($M) | $1,700.0 | $40.2 | $1,659.8 |
| Direct Revenue ($M) | $4,500.0 | $106.5 | $4,393.5 |
| Secondary Revenue ($M) | $5,200.0 | $123.0 | $5,077.0 |

# TOTAL PORT CARGO EFFECTS

**Assumptions:**

1. NWSA data from 2017 used for for Jobs, Compensation, Business Output/Revenue, and Total TEU Volume (WA State Office of Financial Management (2017); Community Attributes Inc. (2019))
2. NWSA data from 2017 to calculate the Jobs/Payroll/Revenue per TEU (WA State Office of Financial Management (2017); Community Attributes Inc. (2019))
3. For the purpose of this analysis, it is assumed that due to the variability in annual Port activity which is fluid based on tenancy, occupancy, and external economic conditions, an average "per TEU" are assumed to be
4. Used the identified acquisition acreage at T30 and T40 to calculate reduction in total Port area of 0.7 percent for Alternative 1, 0.5 percent for Alternative 2, and 0.6 percent for Alternative 3
5. Given continued maritime shipping trends, the breakbulk market is continually decreasing on an annual basis and being replaced with containerized cargo. Therefore, as containerized cargo capacity is anticipated to
6. Applied the relevant reduction in area as a proxy for reduction in cargo handling capacity or total TEUs by alternative
7. Reduced TEU value combined with 2017 "per TEU value" for Jobs/Payroll/Revenue per TEU to arrive a modified values for each category under the three alternatives

## BASE SEATTLE JOBS AND POPULATION

| Construction Jobs | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Avg Const. Indv. Per Day by Qtr | 0 | 135 | 140 | 120 | 185 | 720 | 630 | 350 | 155 | 25 | |
| Const. Indv. Per Day over Yr | 0 | 34 | 35 | 30 | 46 | 180 | 158 | 88 | 39 | 6 | |
| Work Hours/Day (x8 hours) | 0 | 272 | 280 | 240 | 368 | 1440 | 1264 | 704 | 312 | | |
| Work Hours/Year (x261 work days/year) | 0 | 70992 | 73080 | 62640 | 96048 | 375840 | 329904 | 183744 | 81432 | 0 | 1273680 |
| **Wages/year (x$35.84/hour - BLS 2021) ($M)** | **$0.00** | **$2.54** | **$2.62** | **$2.25** | **$3.44** | **$13.47** | **$11.82** | **$6.59** | **$2.92** | **$0.00** | **$45.65** |
| Avg. hourly wage for "Construction and Extraction" careers in Seattle-Tacoma-Bellevue is $35.84/hour<br>Bureau of Labor Statistics May 2021<br>https://www.bls.gov/oes/current/oes_42660.htm#47-0000 | | | | | | | | | | | |

| Coast Guard Jobs | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Base Seattle Population (CG Personnel) | 825 | 825 | 1,000 | 1,150 | 1,300 | 1,450 | 1,550 | 1,550 | 1,450 | 1,800 | 1,900 |
| CG Enlisted | 660 | 660 | 800 | 920 | 1,040 | 1,160 | 1,240 | 1,240 | 1,160 | 1,440 | 1,520 |
| CG Officer | 165 | 165 | 200 | 230 | 260 | 290 | 310 | 310 | 290 | 360 | 380 |
| CG Enlisted Wages/Year (3,750/monthx12 = 45,500/year) ($M) | $30.03 | $30.03 | $36.40 | $41.86 | $47.32 | $52.78 | $56.42 | $56.42 | $52.78 | $65.52 | $69.16 |
| CG Officer Wager/Year (9,930/monthX12 = 119,160/year) ($M) | $19.66 | $19.66 | $23.83 | $27.41 | $30.98 | $34.56 | $36.94 | $36.94 | $345.56 | $42.90 | $45.28 |
| **Total CG Wage Alt (Enlisted + Officer) ($M)** | **$0.00** | **$49.69** | **$60.23** | **$0.00** | **$78.30** | **$87.34** | **$93.36** | **$93.36** | **$398.34** | **$108.42** | **$114.44** |
| **Change in Wages (Row 17 - 49,961,400.00) ($M)** | **$0.00** | **$49.69** | **$60.23** | **$0.00** | **$78.30** | **$87.34** | **$93.36** | **$93.36** | **$398.34** | **$108.42** | **$114.44** |

| Coast Guard Indirect Population Increase (Families) | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Population Assoc. w/Base Seattle (Personnel + Family -Avg. Size 2.2 Members) | 1815 | 1815 | 2200 | 2530 | 2860 | 3190 | 3410 | 3410 | 3190 | 3960 | 4180 |
| Additional Base Seattle Personnel | 0 | 0 | 175 | 325 | 475 | 625 | 725 | 725 | 625 | 975 | 1075 |
| Additional Population Assoc. w/Base Seattle (Family) | 0 | 0 | 210 | 390 | 570 | 750 | 870 | 870 | 750 | 1170 | 1290 |

| Job Creation | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Additional Coast Guard Jobs | 0 | 0 | 175 | 325 | 475 | 625 | 725 | 725 | 625 | 975 | 1075 |
| Indirect Jobs Created (1.9 jobs per 1 CG job - based on NWSA report used in text) | 0 | 0 | 332.5 | 617.5 | 902.5 | 1187.5 | 1377.5 | 1377.5 | 1187.5 | 1852.5 | 2042.5 |

Note: 1.9 jobs per CG job assumption based on NWSA report and I'm not sure they'll agree that they're equivalent with longshoreman bringing goods in/out along with their wages and CG contributing only government wages to community

**Note: Wages over time do not reflect inflation or other estimated factors that may raise/lower average wages**

CG Enlisted/Officer Pay Average of all rank/steps from: https://www.federalpay.org/military/coast-guard

CG Enlisted/Officer Total Personnel from: https://www.bls.gov/ooh/military/military-careers.htm

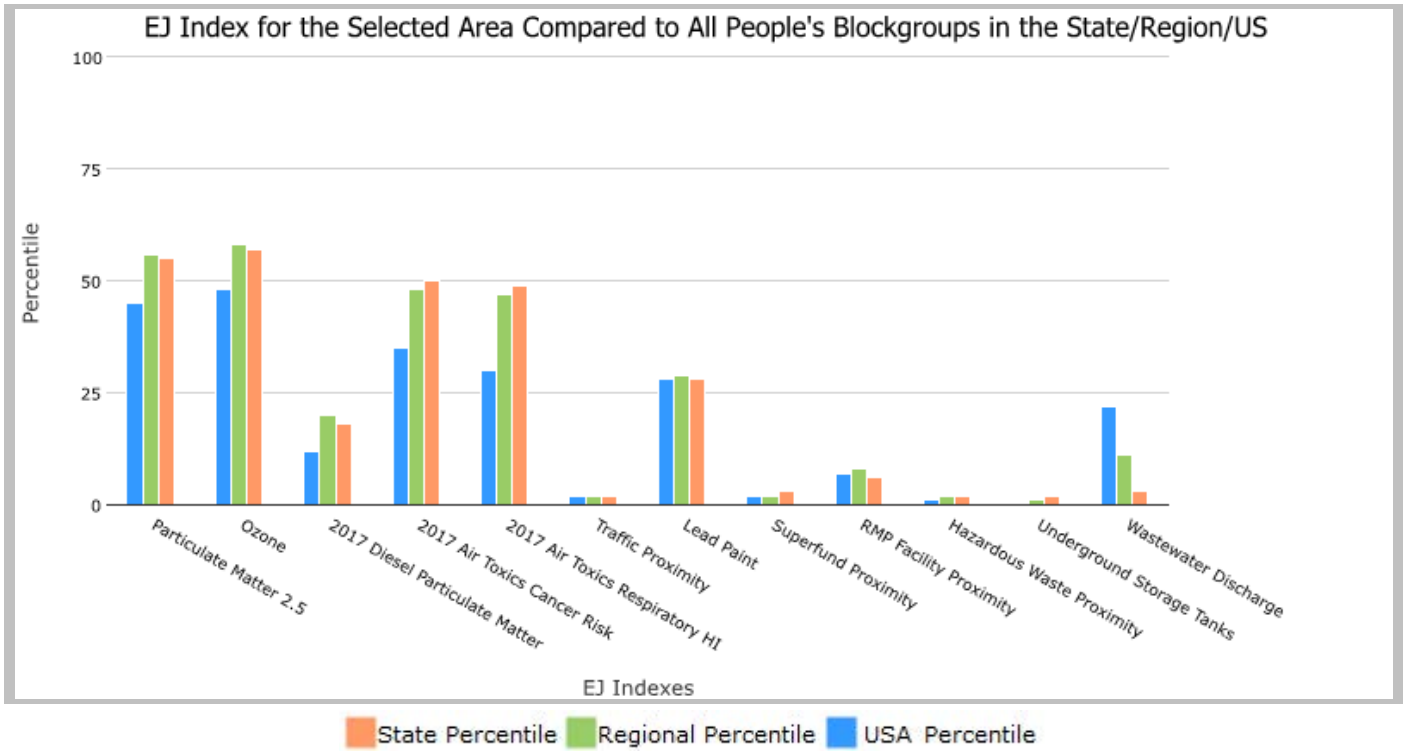
# EJScreen Report (Version 2.0)

**Blockgroup: 530330093002, WASHINGTON, EPA Region 10**

**Approximate Population: 1,441**

**Input Area (sq. miles): 1.03**

| Selected Variables | State Percentile | EPA Region Percentile | USA Percentile |
|---|---|---|---|
| **Environmental Justice Indexes** | | | |
| EJ Index for Particulate Matter 2.5 | 55 | 56 | 45 |
| EJ Index for Ozone | 57 | 58 | 48 |
| EJ Index for 2017 Diesel Particulate Matter* | 18 | 20 | 12 |
| EJ Index for 2017 Air Toxics Cancer Risk* | 50 | 48 | 35 |
| EJ Index for 2017 Air Toxics Respiratory HI* | 49 | 47 | 30 |
| EJ Index for Traffic Proximity | 2 | 2 | 2 |
| EJ Index for Lead Paint | 28 | 29 | 28 |
| EJ Index for Superfund Proximity | 3 | 2 | 2 |
| EJ Index for RMP Facility Proximity | 6 | 8 | 7 |
| EJ Index for Hazardous Waste Proximity | 2 | 2 | 1 |
| EJ Index for Underground Storage Tanks | 2 | 1 | 0 |
| EJ Index for Wastewater Discharge | 3 | 11 | 22 |



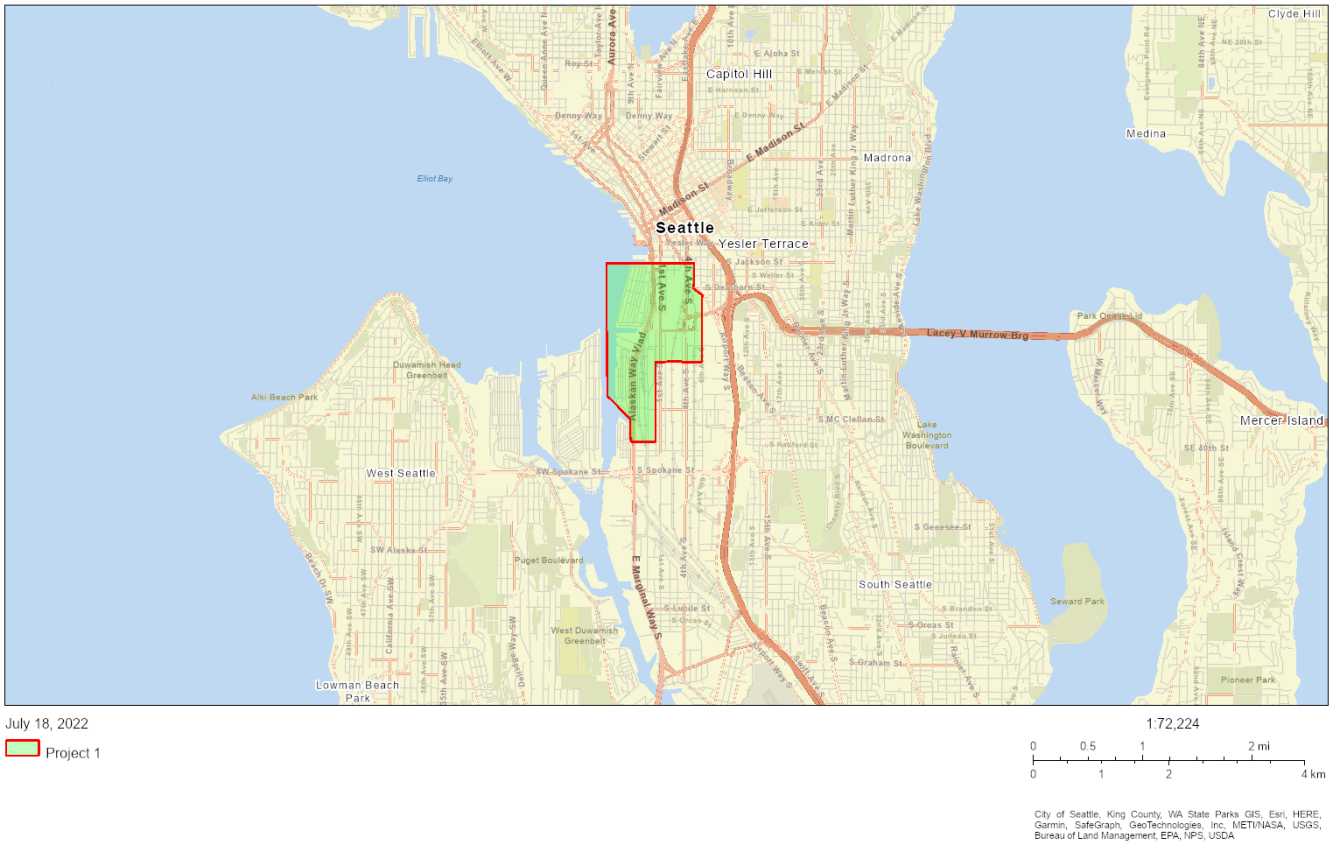

This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

# EJScreen Report (Version 2.0)

**Blockgroup: 530330093002, WASHINGTON, EPA Region 10**

**Approximate Population: 1,441**

**Input Area (sq. miles): 1.03**




| Sites reporting to EPA | |
|---|---|
| Superfund NPL | 0 |
| Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) | 1 |

# EJScreen Report (Version 2.0)

**Blockgroup: 530330093002, WASHINGTON, EPA Region 10**

**Approximate Population: 1,441**

**Input Area (sq. miles): 1.03**

| Selected Variables | Value | State Avg. | %ile in State | EPA Region Avg. | %ile in EPA Region | USA Avg. | %ile in USA |
|---|---|---|---|---|---|---|---|
| **Pollution and Sources** | | | | | | | |
| Particulate Matter 2.5 (µg/m$^3$) | 7.81 | 7.86 | 62 | 8.17 | 45 | 8.74 | 28 |
| Ozone (ppb) | 31.8 | 35.3 | 25 | 37.2 | 16 | 42.6 | 5 |
| 2017 Diesel Particulate Matter* (µg/m$^3$) | 0.854 | 0.336 | 98 | 0.312 | 95-100th | 0.295 | 95-100th |
| 2017 Air Toxics Cancer Risk* (lifetime risk per million) | 40 | 35 | 92 | 33 | 90-95th | 29 | 95-100th |
| 2017 Air Toxics Respiratory HI* | 0.6 | 0.52 | 87 | 0.47 | 90-95th | 0.36 | 95-100th |
| Traffic Proximity (daily traffic count/distance to road) | 4200 | 710 | 97 | 600 | 97 | 710 | 96 |
| Lead Paint (% Pre-1960 Housing) | 0.28 | 0.22 | 70 | 0.22 | 71 | 0.28 | 61 |
| Superfund Proximity (site count/km distance) | 1.2 | 0.19 | 98 | 0.13 | 99 | 0.13 | 98 |
| RMP Facility Proximity (facility count/km distance) | 2.4 | 0.65 | 94 | 0.66 | 94 | 0.75 | 93 |
| Hazardous Waste Proximity (facility count/km distance) | 17 | 2.2 | 98 | 1.7 | 99 | 2.2 | 98 |
| Underground Storage Tanks (count/km$^2$) | 54 | 6.1 | 98 | 4.5 | 99 | 3.9 | 99 |
| Wastewater Discharge (toxicity-weighted concentration/m distance) | 0.0058 | 0.021 | 96 | 0.53 | 88 | 12 | 65 |
| **Socioeconomic Indicators** | | | | | | | |
| Demographic Index | 27% | 29% | 54 | 28% | 55 | 36% | 44 |
| People of Color | 29% | 31% | 54 | 28% | 61 | 40% | 47 |
| Low Income | 24% | 26% | 55 | 28% | 47 | 31% | 44 |
| Unemployment Rate | 5% | 5% | 56 | 5% | 55 | 5% | 54 |
| Linguistically Isolated | 0% | 4% | 43 | 3% | 47 | 5% | 45 |
| Less Than High School Education | 5% | 9% | 42 | 9% | 39 | 12% | 30 |
| Under Age 5 | 2% | 6% | 13 | 6% | 13 | 6% | 14 |
| Over Age 64 | 13% | 15% | 47 | 16% | 45 | 16% | 44 |

*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

# Appendix L:
# Cultural Resources Background Information

# Appendix L
# Cultural Resources Background Information

The following three tables summarize background information specific to Cultural Resources.

**Table L-1. Cultural Resources Definitions**

| Term | Definition |
|---|---|
| Eligible | A property may qualify as eligible for listing in the National Register of Historic Places (NRHP) if it is at least 50 years old, meets the NRHP significance criteria for evaluation, and retains historic integrity, as is defined in the National Historic Preservation Act (36 CFR § 60.4 [a-d]). On occasion, properties less than 50 years old may qualify as eligible if they are found to have exceptional significance (36 CFR § 60.4 [g]). |
| Historic age | A property is historic age, or a historic-age property, if it is at least 50 years of age (36 CFR § 60.4). For purposes of NEPA analysis, due to the length and complexity or proposed projects, 45 years is generally used as the cut off for evaluating potential NRHP eligibility within the proposed project area. |
| Historic property | Under the National Historic Preservation Act (NHPA) and its implementing regulations, the term "historic property" is applied to any archaeological or historical district, site, building, structure, object, or traditional cultural place that is eligible for inclusion or listed in the NRHP (36 CFR § 800.16 [1]). |
| Integrity | The ability of a property to convey its significance (36 CFR § 800). Generally, this is through the retention of one or more of the seven aspects of integrity, which include location, design, setting, materials, workmanship, feeling, and association. |

**Table L-2. Previously Completed Investigations within 0.25-mile of the Project Area**

| DAHP NADB | Report Title | Author/ Date | Report Type | Overlaps with an Alternative (Y/N)? | Overlapping Alternative(s) | Distance from Project Area |
|---|---|---|---|---|---|---|
| 1339823 | Potential Effects on Historic Properties: WSDOT's SR 519, Intermodal Access Project, Seattle, Washington | Holstine 1999 | Historic structures | N | N/A | 800 feet northeast |
| 1348804 | SR 99 Alaskan Way Viaduct & Seawall Replacement Project, Archaeological Monitoring and Review of Geotechnical Borings from South Spokane Street to Battery Street Tunnel | Gillis et al. 2005 | Monitoring | N | N/A | 170 feet east |
| 1347441 | Geoarchaeological Examination of Solid-Core Geoprobes: Alaskan Way Viaduct and Seawall Replacement Project | Northwest Archaeological Associates, Inc. 2006 | Monitoring | N | N/A | 300 feet east |
| 1350966 | Archaeological Resources and Traditional Cultural Places Technical Memorandum for the SR 99: Alaskan Way Viaduct & Seawall Replacement | Hudson et al. 2007 | Survey | N | N/A | 300 feet east |

| DAHP NADB | Report Title | Author/ Date | Report Type | Overlaps with an Alternative (Y/N)? | Overlapping Alternative(s) | Distance from Project Area |
|---|---|---|---|---|---|---|
| | Program Electrical Utilities Relocation Project-Phase 1 | | | | | |
| 1351449 | SR 99: Alaskan Way Viaduct & Seawall Replacement Program: Section 106 Technical Report Historical Resources S. Holgate Street to King Street Viaduct Replacement Project | Sheridan 2008 | Historic structures | Y | All | In Project Area |
| 1350614 | Addendum: SR 519 Intermodal Access Project Phase 2: South Atlantic Corridor, Results of Supplemental Archaeological Investigations | Northwest Archaeological Associates, Inc. 2008 | Survey | N | N/A | 810 feet east |
| 1685617 | SR 99: Alaskan Way Viaduct & Seawall Replacement Program Archaeological Assessment S. Holgate Street to S. King Street Viaduct Replacement | Miss 2008 | Monitoring | N | N/A | 130 feet east |
| 1351445 | The Alaskan Way Viaduct & Seawall Replacement Project, Results of the Archaeological Core Collection Program: Phase 1 | Miss et al. 2008 | Data recovery | N | N/A | 240 feet north |
| 1354895 | Cultural Resources Monitoring Report, SR 99 South Holgate Street to South King Street Viaduct Replacement Project Archaeological Monitoring Stage 1 Seattle, King County, Washington | Casella et al. 2010 | Monitoring | N | N/A | 195 feet east |
| 1354642 | Cultural Resources Investigations and Monitoring Report: State Route 519 Intermodal Access Phase 2: South Atlantic Corridor and South Atlantic Street Road Improvements from Utah Avenue South to First Avenue South | Mullaley et al. 2010 | Survey and monitoring | N | N/A | 820 feet east |
| 1353931 | SR99: Alaskan Way Viaduct & Seawall Replacement Program, Results of Monitoring for the AWV Electrical Line Relocation Project | Valentino et al. 2010 | Monitoring | N | N/A | 840 feet northeast |

| DAHP NADB | Report Title | Author/ Date | Report Type | Overlaps with an Alternative (Y/N)? | Overlapping Alternative(s) | Distance from Project Area |
|---|---|---|---|---|---|---|
| 1680716 | SR99 S Hudson Street to Ward Street Automated Viaduct Closure Gates Project | Bartoy 2011 | Monitoring | N | N/A | 150 feet east |
| 1680616 | Data Recovery Report for Site 45KI924, Seattle Washington for the SR99 Alaskan Way Viaduct Moving Forward Project | Schneyder et al. 2011 | Data recovery | N | N/A | 680 feet northeast |
| 1682621 | Results of a Cultural Resources Inventory of the Sea Grinder (Trileaf #602141) Cell Colocation Site, Seattle | Finley 2012 | Survey | N | N/A | 800 feet northeast |
| 1683022 | Cultural Resources Monitoring Report SR 99 South Holgate Street to South King Street Viaduct Replacement Project Archaeological Monitoring Stage 2 Seattle, King County, Washington | Reed et al. 2012 | Monitoring | Y | 2 | In Project Area |
| 1683535 | King Dome #SE29XC263, 2201 1st Ave S, Seattle | Pinyerd 2013 | Historic structures | N | N/A | 0.25 mile east |
| 1688472 | Ghost Signs of Seattle: Policy Review and Inventory in Pioneer Square and Chinatown - International District | Wong 2013 | Historic structures | N | N/A | 800 feet northeast |
| 1694925 | SR 99 Bored Tunnel Project, Seattle, King County, Washington – Archaeological Monitoring Report | Yamamoto 2019 | Monitoring | N | N/A | 560 feet northeast |

Notes:
NADB = North American Database
N/A = Not Applicable

**Table L-3. Archaeological Resources Located within 0.25-mile of the Project Area**

| Site ID Number/ Name (if available) | DAHP Site Type | NRHP Eligibility Status | Overlaps with an Alternative (Y/N)? | Distance from Project Area |
|---|---|---|---|---|
| 45KI00924 Dearborn South Tideland Site | Historic commercial properties | Eligible (6/6/2009) | N | 500 feet |
| 45KI00942 W.L. McCabe's Machine Shop Site | Historic commercial properties | Not Eligible (2/16/2010) | N | 180 feet |
| 45KI00947 | Historic residential structures | Not Eligible (2/16/2010) | N | 330 feet |

| Site ID Number/ Name (if available) | DAHP Site Type | NRHP Eligibility Status | Overlaps with an Alternative (Y/N)? | Distance from Project Area |
|---|---|---|---|---|
| 45KI01188 Historic Winn & Russell, Inc. | Historic commercial properties, Historic industrial, Historic debris scatter/ concentration. | Unevaluated | N | 100 feet |

Notes:
DAHP = Washington State Department of Archaeology and Historic Preservation
NRHP = National Register of Historic Places

**Table L-4. Historic Built-Environment Resources Previously Determined Not Eligible**

| Building | Description |
|---|---|
| Building 1 | Building 1, according to SHPO and Coast Guard records, was constructed in 1925 for the Pacific Steamship Company (Sheridan 2008). The four-story, concrete-formed building was erected by the general contracting firm of Albertson, Cornell Brothers, & Walsh. The 43,700-square-foot building with a flat roof includes a penthouse and has a trapezoidal plan that follows the alignment of Alaskan Way South on its east side. The building measures approximately 100 feet north/south and 120 feet east/west. It has five bays running east/west. The south elevation has four bays, with six bays on the north; all bays are defined by rectangular concrete pilasters applied on the exterior with simplified Art Deco detailing. The central entry bay on the east façade is emphasized through the extension of two pilasters upward an additional story with an arch and balcony with extensive Art Deco detailing; at the top, decorative concrete detailing depicts a sailing ship. The rectangular windows have been replaced with aluminum casement windows and are divided by concrete mullions between the pilasters. The building has been altered by filling in the original open entry area and doors on the east side of the ground floor; all have been filled with concrete blocks. In addition, the exterior received a skim coat of stucco over the original concrete between 1959 and 1986. The building does not appear to have had any additions.<br><br>As the headquarters of the Pacific Steamship Company, the building is associated with Seattle's maritime development. The company remained in operation until 1940, when it vacated the property. In 1940, the property became associated with World War II as it was purchased by the Army Quartermaster Corps as a supply depot for Alaska. In November 1941, the site became an Army Port of Embarkation, and continued to serve in this capacity until 1955. During World War II, it was one of the largest Army supply depots in the country, with 3,000 employees. By the mid-1950s, the military was using aircraft for most shipping, and the vacant facility became the local headquarters for USACE and also served as an Army recruiting and induction center. The property on which the building stands was purchased by the Port of Seattle in 1964, and the entire northern portion of the original 25-acre site became a container terminal (Terminal 46). In 1973, Pier 36 and part of Pier 37 were leased the Coast Guard, which refurbished the Pacific Steamship Company headquarters, for the District 13 headquarters. |

| Building | Description |
|---|---|
| Building 2 | Building 2, according to Coast Guard records, was constructed in 1930 for the Pacific Steamship Company and contains 11,500 square feet. The two-story building with a flat roof appears to be composed of reinforced concrete and has three bays located on the primary elevation, which faces east towards Alaska Way South. The building has rectangular windows, which do not appear original to the building's construction, and bays are articulated by concrete pilasters.<br><br>As a building constructed for the Pacific Steamship Company, it is associated with Seattle's maritime development. The company remained in operation until 1940, when it vacated the property. In 1940, the property became associated with World War II as it was purchased by the Army Quartermaster Corps (see additional context under Building 1 above). Circa 1964, the building was transferred to the Coast Guard. The building currently serves as the Exchange for Base Seattle and offers goods and services to eligible personnel. |
| Building 3 | Building 3, according to Coast Guard records, was constructed in 1923 as a commercial marine passenger and freight terminal for the Pacific Steamship Company's Pacific Steamship Terminals and contains 88,350 square feet. The two-story building has a gable roof with a ridgeline monitor window along the roof and appears to be wood framed with metal exterior cladding. The building originally extended 990 in length and occupied 160,312 square feet; however, sometime after 1960 the building was shortened to its current length of 570 feet. Since that time, additional substantial alterations have occurred including the following: rail access was removed from the building and the depressed rail tracks infilled; most of the loading dock overhead doors were removed; offices and shops have been constructed within the building; and all windows, doors, and siding have been replaced.<br><br>As a building constructed for the Pacific Steamship Company, it is associated with Seattle's maritime development and maritime transportation. The company remained in operation until 1940, when it vacated the property. In 1940, the property became associated with World War II as it was purchased by the Army Quartermaster Corps (see additional context under Building 1 above). Following World War II and until 1957, the Army Transportation Corps operated the building as part of the Seattle Army Terminal. Circa 1964, the building was transferred to the Coast Guard, after which time the extensive interior and exterior alterations occurred. |

| Building | Description |
|---|---|
| | **Building 7,** according to Coast Guard records, was constructed in 1941 by the U.S. Army as Warehouse No. 1, part of the Army Port of Embarkation (see additional context under Building 1 above). The four-story, irregularly shaped building is formed of cast-in-place concrete atop a wood piling foundation. It features bands of rectangular replacement windows along all exterior elevations. From 1941 to 1957, the building was used by the Sixth Army for receiving, temporary storage, and shipments of military material to and from various oversees locations. In 1958, the building was transferred to USACE, after which time the extensive interior and exterior alterations began to occur. Additional alterations occurred after 1999, when the Coast Guard acquired the building. The building currently serves as a Coast Guard warehouse and provides space for storage, shops, a small arms range, administrative spaces, and indoor parking.<br><br>The building was remodeled in 1958, as well as multiple other renovations between 1958 and 2000. In 1958, USACE renovated the building and constructed offices and laboratories. In 1965, the General Services Administration renovated portions of the first floor for offices and a motor pool for government vehicles. In the 1970s, the Coast Guard renovated the western portion of the first floor into comptroller offices, shipping, and receiving. They also renovated the western portion of the fourth floor, creating a small arms firing range. In the 1980s, USACE renovated the southeast portion of the first floor for use as a homeless shelter. In 1999, the Coast Guard took ownership over Building 7 from USACE and has periodically renovated it since that time to accommodate office and logistical uses.<br><br>Exterior alterations occurring after 1958 include the following: along the south elevation, 9 of the 12 roll-up doors have been infilled and a new entrance was added for the homeless shelter; the Coast Guard firing range was constructed on the fourth floor, which required infilling of windows on the south elevation, and installation of ventilation ducts on the west elevation; along the west elevation, the shipping and receiving center was constructed, with new loading docks, a canopy, and a new opening cut into the building; along the north elevation, a new entrance was created for the comptroller offices, two rollup doors were infilled, and new windows were installed; also along the north elevation, many windows and doors have been replaced near the main entrance; at the former loading dock on the north elevation, two rollup doors have been infilled and a third has been blocked with installation of a large fuel storage tank with secondary containment; along the east elevation, most windows on the first and second floor have been replaced; and lastly, on the fourth floor, several windows have been replaced by ventilation ductwork. |

**Table L-5. Historic Built-Environment Resources Located within 0.25-mile of the Project Area**

| DAHP Property ID No./ Site No. | Name/ Address | Date | NRHP Eligibility Status/Date | Overlaps with an Alternative (Y/N)? | Over-lapping Alternatives | Distance from Project Area |
|---|---|---|---|---|---|---|
| 333112 | U.S. Coast Guard Cutter POLAR SEA/ Ship docked | 1978 | Determined Eligible (7/10/2011) | Y | All | In Project Area (ship |

| DAHP Property ID No./ Site No. | Name/ Address | Date | NRHP Eligibility Status/Date | Overlaps with an Alternative (Y/N)? | Over-lapping Alternatives | Distance from Project Area |
|---|---|---|---|---|---|---|
| | at Pier 36, 1519 Alaska Way South | | | | | docked at Pier 36) |
| 85746 | California Ink Company (Pacific Maritime Institute)/ 1727 Alaska Way South | 1950 | Determined Not Eligible (2/25/2008) | Y | Alternatives 2 and 3 | In Project Area |
| 85759/ 85995 | Pacific Steamship Company (U.S. Coast Guard Support Center Seattle)/ 1519 Alaska way | 1925 | Determined Not Eligible (5/3/2008) | Y –Building 1 within Base Seattle | All | In Project Area |
| 49549 | Coast Guard Cutter Bayberry (WLI 65400)/ Ship docked at Pier 36 | 1954 | Determined Not Eligible (12/12/2006) | Y | All | In Project Area |
| 42706 | Bemis Bag Company/ 55 South Atlantic Street | Unk | Determined Eligible (9/20/1991) | N | N/A | 0.04 mile east |
| 85754 | Bemis Brothers Bag Company/ 65 South Atlantic Street | 1905 | Determined Eligible (2/25/2008) | N | N/A | 0.07 mile east |
| 85755 | Rental Machinery Company (Fashion Furniture)/ 1531 Utah Street | 1926 | Determined Not Eligible (2/25/2008) | N | N/A | 0.10 mile east |
| 85747 | Fortune Transfer/ 72 South Atlantic Street | 1957 | Determined Not Eligible (2/25/2008) | N | N/A | 0.09 mile east |
| 85270 | International Harvester Motor Truck Branch dealership/ 1251 1st Avenue South | 1949 | Determined Not Eligible (4/9/2008) | N | N/A | 0.13 mile east |
| 342106 | H. J. Heinz Co. Office/ 85 South Atlantic Street | 1937 | Determined Not Eligible (2/25/2008) | N | N/A | 0.10 mile east |
| 86495 | Jessman Realty Warehouse Building/ 1534 1st Avenue South | 1928 | Determined Eligible (7/7/2008) | N | N/A | 0.17 mile east |
| 42707 | Milwaukee Road Freight House/ 95 South Atlantic Street | Unk | Determined Eligible (7/7/2008) | N | N/A | 0.14 mile east |
| 44931 | Gladding McBean Co., Denny Renton Clay and Coal Co. Building/ 1500 1st Avenue South | 1936 | Determined Eligible (7/7/2008) | N | N/A | 0.16 mile east |
| 44093 | Vic de Imastro Produce/ 1505 Occidental Avenue South | Unk | Unevaluated | N | N/A | 0.20 mile east |
| 104873/ 85271/ 48645 | Western Electrical Company Building/ Frederick and Nelson Warehouse/ 1518 1st Avenue South | 1907 | Determined Eligible (4/29/2010) | N | N/A | 0.19 mile east |
| 85753 | David Dow and Sons/ 1526 1st Avenue South | 1930 | Determined Not Eligible (2/25/2008) | N | N/A | 0.20 mile east |

| DAHP Property ID No./ Site No. | Name/ Address | Date | NRHP Eligibility Status/Date | Overlaps with an Alternative (Y/N)? | Over-lapping Alternatives | Distance from Project Area |
|---|---|---|---|---|---|---|
| 86496 | Simmons Co. Building/ 1701 1st Avenue South | Unk | Determined Eligible (7/7/2008) | N | N/A | 0.20 mile east |
| 86498 | Warehouse and Truck Storage Co./ 1712 1st Avenue South | Unk | Determined Eligible (7/7/2008) | N | N/A | 0.22 mile east |
| 86497 | Star Machinery Co. Building/ 1714 1st Avenue South | Unk | Determined Eligible (7/7/2008) | N | N/A | 0.23 mile east |
| 44932 | Building/ 1731 1st Avenue South | Unk | Unevaluated | N | N/A | 0.22 mile east |
| 07001457/ 45KI00773 | A.L. Palmer Building | 1910 | Listed (1/23/2008); also listed in WHR | N | N/A | 0.1 mile northeast |
| 45KI00125 | U.S.S. Nebraska Launching (Skinner and Eddy Shipyard) | 1904 | Unevaluated (listed in WHR 3/8/1974) | N | N/A | 960 feet north |
| 700072/ 45KI00132 | First Service Station Site - Seattle | 1907 | Unevaluated (listed in WHR 12/9/1970) | N | N/A | 300 feet south |
| 70000086/ DT00053 | Pioneer Square--Skid Road Historic District | 1889 | Listed (1/15/2008) | N | N/A | 0.27 mile northeast |

Notes:
Unk = Unknown
N/A = Not Applicable
WHR = Washington Heritage Register

## Table L-6. Consultation Record to Date

| Date | Subject | From | Consulting Party | Type |
|---|---|---|---|---|
| 5/7/2021 | Notice of Intent | USCG | Multiple Parties | Letter |
| 5/18/2021 | Invitation to consult for the Project under EO 13175, NEPA, and Section 106 | Patrick Dugan, Captain, USCG | Leonard Forsman, Chairman, Suquamish Tribe | Letter |
| 5/20/2021 | Invitation to consult for the Project under EO 13175, NEPA, and Section 106 | Patrick Dugan, Captain, USCG | Jaison Elkins, Tribal Chair, Muckleshoot Indian Tribe | Letter |
| 7/22/2021 | Invitation to consult for the Project under EO 13175, NEPA, and Section 106 | Patrick Dugan, Captain, USCG | Robert de los Angeles, Chairperson, Snoqualmie Indian Tribe | Letter |
| 7/22/2021 | Invitation to consult for the Project under EO 13175, NEPA, and Section 106 | Patrick Dugan, Captain, USCG | Teri Gobin, Chairwoman, Tulalip Tribes of Washington | Letter |
| 7/22/2021 | Invitation to consult for the Project under EO 13175, NEPA, and Section 106 | Patrick Dugan, Captain, USCG | Delano Saluskin, Chairman, Confederated Tribes and Bands of the Yakama Nation | Letter |
| 11/23/2021 | Teleconference with DAHP regarding cultural resources survey for the Project | USCG | DAHP | Meeting |

# APPENDIX M:

# Protected Species Life Histories and Habitat Information

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# APPENDIX M

# Protected Species Life Histories and Habitat Information in Support of the Expansion and Modernization of United States Coast Guard Station Base Seattle

## 1.0 INTRODUCTION

The following list of protected species has been developed as a preliminary step in determining which species has the potential to be impacted by activities associated with the Expansion and Modernization of United States Coast Guard Station Base Seattle. Their potential for occurrence within the Action Areas has been determined by habitat preferences and species ranges. Brief life histories for each of these species is presented below.

**Table 1. Protected Species Within the Action Areas and Their Status, Occurrence, and Applicable Federal Laws of Protection**

| Species | Federal Status | State Status[a] | Occurrence | Applicable Action Area(s) | Time of Year Expected | Applicable Federal Law |
|---|---|---|---|---|---|---|
| **Birds** | | | | | | |
| Marbled murrelet (*Brachyramphus marmoratus*) | T | E | Uncommon | 1, 2, 3 and 4 | Year-round | ESA<br>MBTA |
| Streaked horned lark (*Eremophila alpestris strigata*) | T | E | Not expected to occur | NA | NA | ESA |
| Yellow-billed cuckoo, Western U.S. DPS (*Coccyzus americanus*) | T | E | Not expected to occur | NA | NA | ESA<br>MBTA |
| Bald eagle (*Haliaeetus leucocephalus*) | NL | NL | Expected to Occur | 1, 2, and 3 | Year-round | MBTA<br>BGEPA |
| Black turnstone (*Arenaria melanocephala*) | NL | NL | Expected to occur | 1, 2, and 3 | August to March | MBTA |
| Evening grosbeak (*Coccothraustes vespertinus*) | NL | NL | Uncommon | 1, 2, and 3 | April to December | MBTA |
| Lesser yellowlegs (*Tringa flavipes*) | NL | NL | Expected to occur | 1, 2, and 3 | May to August | MBTA |
| Rufous hummingbird (*Selasphorus rufus*) | NL | NL | Uncommon | 1, 2, and 3 | March to September | MBTA |
| Black swift (*Cypseloides niger*) | NL | NL | Not expected to occur | NA | NA | MBTA |
| Clark's grebe (*Aechmophorus clarkii*) | NL | C | Not expected to occur | NA | NA | MBTA |
| Olive-sided flycatcher (*Contopus cooperi*) | NL | NL | Not expected to occur | NA | NA | MBTA |
| Short-billed dowitcher (*Limnodromus griseus*) | NL | NL | Not expected to occur | NA | NA | MBTA |

| Species | Federal Status | State Status[a] | Occurrence | Applicable Action Area(s) | Time of Year Expected | Applicable Federal Law |
|---|---|---|---|---|---|---|
| Golden eagle (*Aquila chrysaetos*) | NL | C | Not expected to occur | NA | NA | MBTA<br>BGEPA |
| **Insects** | | | | | | |
| Monarch butterfly (*Danaus plexippus*) | C | NL | Not expected to occur | NA | NA | ESA[a] |
| **Fish** | | | | | | |
| Bull trout (*Salvelinus confluentus*) | T | C | Expected to occur | 4 | Year-round | ESA |
| Chinook salmon, Puget Sound ESU (*Oncorhynchus tshawytscha*) | T | NL | Expected to occur | 4 | August to November (Adults) April to July (Juveniles) | ESA |
| Steelhead trout, Puget Sound DPS (*Oncorhynchus mykiss*) | T | C | Expected to occur | 4 | Year-round | ESA |
| Bocaccio, Puget Sound/Georgia Basin DPS (*Sebastes paucispinis*) | E | NL | Rare | 4 | March to October | ESA |
| Yelloweye rockfish, Puget Sound/Georgia Basin DPS (*Sebastes ruberrimus*) | T | NL | Rare | 4 | Year-round | ESA |
| **Marine Mammals** | | | | | | |
| Killer whale, Southern Resident DPS (*Orcinus orca*) | E | E | Uncommon | 4 | September to May | ESA<br>MMPA |
| Killer whale, Transient Stock | NL | NL | Expected to occur | 4 | Year-round | MMPA |
| Humpback Whale, Mexico DPS (*Megaptera novaeangliae*) | T | E | Uncommon | 4 | Year-round | ESA<br>MMPA |
| Humpback Whale, Central America DPS | E | E | Uncommon | 4 | Year-round | ESA<br>MMPA |
| Humpback whale, Hawaii DPS | NL | NL | Uncommon | 4 | Year-round | MMPA |
| Gray whale, Eastern North Pacific Stock (*Eschrichtius robustus*) | NL | NL | Uncommon | 4 | March to May | MMPA |
| Minke whale (*Balaenoptera acutorostrata*) | NL | NL | Rare | 4 | September to January | MMPA |
| Harbor seal (*Phoca vitulina*) | NL | NL | Expected to occur | 4 | Year-round | MMPA |
| Northern elephant seal (*Mirounga angustirostris*) | NL | NL | Rare | 4 | November to March | MMPA |
| California sea lion (*Zalophus californianus*) | NL | NL | Expected to occur | 4 | Year-round | MMPA |
| Steller sea lion (Eastern DPS) (*Eumetopias jubatus*) | NL | NL | Uncommon | 4 | Year-round | MMPA |
| Dall's porpoise (*Phocoenoides dalli*) | NL | NL | Uncommon | 4 | October to February | MMPA |
| Harbor porpoise (*Phocoena phocoena*) | NL | C | Expected to occur | 4 | Year-round (May to June peak) | MMPA |

| Species | Federal Status | State Status[a] | Occurrence | Applicable Action Area(s) | Time of Year Expected | Applicable Federal Law |
|---|---|---|---|---|---|---|
| Long-beaked common dolphin (*Delphinus capensis*) | NL | NL | Uncommon | 4 | Year-round | MMPA |
| Bottlenose dolphin (*Tursiops truncatus*) | NL | NL | Uncommon | 4 | Year-round | MMPA |

Notes:
DPS = Distinct Population Segment T = Threatened NL = Not Listed
ESU = Evolutionarily Significant Unit E = Endangered
NA = Not applicable C = Candidate
a Candidate for listing- not provided the same protection ESA threatened or endangered species. Not subject to consulation.

[a] = Status for species listed as threatened, endangered, or sensitive within the State of Washington by the WDFW.

## 2.0 SPECIES AND HABITAT PROTECTED UNDER THE ENDANGERED SPECIES ACT (ESA)

This section provides brief descriptions of the life histories of species listed under the Endangered Species Act (ESA) and regulated by either the United States Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) that have been documented as having the potential to occur within the upland or in-water Action Areas. Detailed information regarding listed species critical habitat that lies within the Action Areas is also provided.

### 2.1 Marbled Murrelet

Marbled murrelets are seabirds that forage in marine waters but nest in forests. In Washington, marbled murrelets nest in mature and old-growth conifer forests, and sometimes in comparatively younger forests with residual old-growth trees. They are found in marine waters in general proximity to their nesting habitat.

Historically, marbled murrelets in Puget Sound were considered common and abundant. Currently, marbled murrelets are listed as a threatened species under the ESA. Distribution of this species can depend on season, productivity, or ocean conditions. They are common locally only during some parts of the year (Speich and Wahl 1995). Puget Sound and the northern part of the outer coast are typically used by marbled murrelets during the breeding season, from late-March through late-September. However, seasonal movements of marbled murrelets into Puget Sound from British Columbia appear to occur in the winter (USFWS 1997).

Suitable nesting habitat does not occur within the Action Areas of the project site, but potential foraging habitat in the East Waterway and Elliott Bay could support individuals. Due to the industrial development in the area, the marbled murrelet would be considered uncommon in the upland and in-water Action Areas but may forage in the adjacent waters during project activities.

### 2.2 Streaked Horned Lark

In Washington, the streaked horned lark is found occupying large expanses of bare or sparsely vegetated land south of Puget Sound, including fields, prairies, airports, and similar areas with low or sparse grassland vegetation. They have also been noted on coastal beaches, dredge spoil islands, and sparsely vegetated shoreline sites along the lower Columbia River (WDFW 2022a). Since this habitat is not available on or near the project site, the streaked horned lark is not expected to be present within the upland Action Areas during project activities.

## 2.3 Yellow-Billed Cuckoo - Western U.S. DPS

Yellow-billed cuckoos prefer, almost exclusively, large, continuous riparian zones with cottonwoods (*Populus* sp.) and willows (*Salix* sp.). Nesting habitat includes woodlands and open brushy hillsides. As a migratory species, they arrive in western North America beginning in mid to late May and depart between late August to mid-September. Since the 1950s, there have only been 20 sightings of this species in Washington with 16 of these records occurring in eastern Washington. Those individuals that were identified were very likely non-breeding vagrants or migrants. As such, the yellow-billed cuckoo is classified as functionally extirpated (WDFW 2022b). Based on the lack of preferred riparian habitat on or near the project site, the seasonal migration patterns of the species, and the rarity of sightings within the State of Washington, the yellow-billed cuckoo is not expected to be present within the upland Action Areas during project activities.

## 2.4 Monarch Butterfly

Although monarch butterflies are not currently protected under the ESA, they are a federal candidate species for listing consideration. The population of monarch butterflies in Washington is low and declining. The monarch is a large butterfly with a wingspan of approximately 3-4 inches. The male's upper-side wings are bright orange with black veins and borders; the female's upper-side wings are brownish orange with muted black veins and borders.

Most monarch butterflies that breed in Washington overwinter in California. Secure patches of milkweed (*Asclepias* spp.) and/or nectar resources are necessary during breeding, roosting, and migration. In Washington, milkweeds and monarchs are found in weedy fields and sparsely vegetated habitats, usually near wetlands or riparian areas. On their southbound migration corridors (often river courses), the butterflies require abundant late season nectar and trees for roosting at night and refuge during rain events (WDFW 2022c).

While it is feasible to assume that monarch butterflies may pass through the greater Seattle area during their annual migration, the upland Action Areas are industrial in nature and do not contain the preferred vegetation that monarchs require for feeding and breeding (i.e., milkweeds and other nectar sources). Therefore, the monarch butterfly is not expected within the upland Action Areas during project activities.

## 2.5 Bull Trout

The bull trout, a federally listed threatened species, is native to western North America and lives in a variety of different habitats, including small streams, large rivers, and lakes or reservoirs. They exhibit resident and migratory life-history strategies through much of their current range. Resident and migratory forms may be found together, and it is suspected that bull trout give rise to offspring exhibiting either resident or migratory behavior (Rieman and McIntyre 1993).

The Coastal/Puget Sound population that exists within the lower Duwamish River/Elliott Bay estuary is significant to the species as a whole because it is thought to contain the only anadromous forms of bull trout in the conterminous U.S. Individuals from this population may spend the first 2 to 4 years in small natal streams prior to migrating through the larger rivers, lakes, and reservoirs to Puget Sound and the Pacific Ocean. Bull trout can be found year-round in the Puget Sound with varying life stages and populations (Goetz et al. 2004). Therefore, it is expected that the bull trout would occur year-round within the in-water Action Area.

## 2.6 Chinook Salmon - Puget Sound ESU

The Chinook salmon is the largest of the Pacific salmon. Also known as “king” salmon, adult Chinook salmon migrate from a marine environment into freshwater streams and rivers of their birth (natal streams and rivers) where they spawn before dying. The Puget Sound ESU of Chinook salmon is the only listed ESU with the potential of being found within the Action Area. The range for the Puget Sound ESU includes all accessible marine, estuarine, and river reaches within Puget Sound.

The Puget Sound ESU Chinook salmon expected to occur within the in-water Action Area may belong to the Green River (Duwamish), White River, Puyallup River, and Nisqually River populations of the Central/South Puget Sound Basin Major Population Group (NMFS 2019). Those four populations include spring and fall-run adults and juveniles that may migrate through or near Action Area 4 (WDFW 2019; Northwest Fisheries Science Center [NWFSC] 2015).

Adult Chinook salmon return to the Green River for spawning which occurs between August and November (NMFS 2007; PSIT and WDFW 2022). Spawning occurs in the upper accessible portions of the Green River, far upstream and away from the Action Area (NMFS 2019). Since 1988, the estimated total abundance for returning adult Green River basin Chinook salmon has fluctuated between about 688 and 11,512, with the recent trend increasing (PSIT and WDFW, 2022).

Juveniles from the Green River fall-run population are the most likely to enter the Action Area due to the close proximity of that river system to the project site, the strong shoreline obligation exhibited by juvenile Chinook salmon when they first enter estuarine and marine waters, and their need to migrate north to reach oceanic waters (NMFS 2019).

Green River basin juveniles typically leave the river and enter estuarine/marine waters between early April and mid-July, using nearshore areas for rearing (Coast Guard 2006). Juvenile Chinook salmon from the rest of the Central/South Puget Sound Basin Major Population Group likely leave their natal streams at close to the same time and may pass through the Action Area as they migrate north toward the ocean (NMFS 2019). Adults returning to spawn are expected August through November. Adult salmonids, however, are pelagic in nature and are expected to use the deeper Duwamish River channel and Elliott Bay as opposed to the nearshore areas during their migrations (Coast Guard 2006). Therefore, it is expected that Puget Sound ESU Chinook salmon would commonly be found either migrating or rearing within Action Area waters throughout different times of the year.

## 2.7 Steelhead Trout - Puget Sound DPS

The life history of steelhead trout is one of the most complex of any of the salmonid species. The species exhibits both anadromous forms (steelhead) and resident forms (usually referred to as rainbow or redband trout). Steelheads reside in the marine environment for 2 to 3 years before returning to their natal stream to spawn at the age of four or five. Unlike Pacific salmon, steelhead trout are iteroparous, or capable of spawning more than once before they die. It is rare, however, for steelhead to spawn more than twice before dying, and those that do are usually females.

There is one listed DPS of steelhead trout that has the potential of being found within the in-water Action Area associated with the expansion and modernization od Base Seattle. Individuals from the

Puget Sound DPS are found in most larger tributaries with access to Puget Sound and the eastern Strait of Juan de Fuca. A survey of the Puget Sound District in 1929 and 1930 identified steelhead in every major basin except the Deschutes River (Hard et al. 2007).

The Puget Sound DPS steelhead has two runs; a winter-run in which adults migrate from December to April, and a summer-run in which adults migrate May to October (Myers et al. 2015). Juvenile steelhead in the Puget Sound are typically large and independent of shallow nearshore areas soon after entering marine water. Therefore, they migrate north to the Strait of Juan de Fuca very quickly (Bax et al. 1978; Brennan et al. 2004; Schreiner et al. 1977; Moore et al. 2010; as cited in NMFS 2019). Similarly, returning adult Puget Sound steelhead migrate upriver very quickly (NMFS 2019). It is therefore expected that Puget Sound steelhead would be expected to occur briefly within Action Area 4 during migration periods only, as neither life stage is likely to linger in the nearshore waters of the project site for very long.

## 2.8 Bocaccio - Puget Sound/Georgia Basin DPS

Bocaccio are large Pacific Coast rockfish that reach up to 3 feet in length with a distinctively long jaw extending to at least the eye socket. Their range extends from Baja, California to the Gulf of Alaska and Kodiak Islands. Approximately 50 percent (%) of adult bocaccio mature in three to four years, and 100% by seven to eight years (Drake et al. 2010). Bocaccio are difficult to age but are suspected to live as long as 50 years or more (NMFS 2019).

In Washington, larval release begins in January and runs through April but peaks in February (Drake et al. 2010). Larvae are found in surface waters and may be distributed over a wide area extending several hundred miles offshore. Larvae and small juvenile rockfish may remain in open waters for several months, being passively dispersed by currents. They are often observed under free floating algae and kelp. Juveniles (i.e., 3-6 months old) prefer shallow nearshore waters with rocky or cobble substrate with kelp or sandy eelgrass (*Zostera marina*). As bocaccio grow, they prefer deeper waters (NMFS 2019).

In Puget Sound, rockfish populations are in low abundance and are thought to have declined at least 70% since 1965. Bocaccio populations, specifically, are thought to have declined even more (NMFS 2019). The current population size is unknown and in the seven years prior to the Status Review of the species, there were no confirmed observations of bocaccio in the Puget Sound/Georgia basin (Drake et al. 2010). Therefore, population estimates and trends are unreliable. Individual bocaccio that may be present at the project site would likely be limited to very low numbers of pelagic larvae and pre-settlement juveniles that may occasionally pass through the area on currents. If present, larval and/or juvenile bocaccio are most likely to occur within the Action Area 4 between March and October (Greene and Godersky 2012; NMFS 2017; Palsson et al. 2009 as cited in NMFS 2019).

Although critical habitat for bocaccio is designated within Action Area 4, it is located approximately 600 feet away from the Area 3 construction footprint.

## 2.9 Yelloweye Rockfish - Puget Sound/Georgia Basin DPS

Yelloweye rockfish are very large rockfish that reach up to 3.5 feet in length and 39 pounds in weight. The range of the yelloweye rockfish is from Baja, California to the Aleutian Islands in Alaska. Yelloweye

rockfish are internally fertilized and can store sperm for several months prior to fertilization. In the Puget Sound, fertilization occurs during the winter to summer months, with birth in early spring to late summer (Washington et al. 1978 as cited in Drake et al. 2010). Live larval young are found in surface waters and may be distributed over a wide area extending several hundred miles offshore. Larvae and small juvenile rockfish may remain in open waters for several months, being passively dispersed by ocean currents. Although not well known, it is thought that 50% reach maturity at 15 to 20 years of age (Drake et al. 2010).

Juveniles and subadults tend to be more common than adults in shallower water, and are associated with rocky reefs, kelp canopies, and artificial structures, such as piers and oil platforms. Adults generally move into deeper water as they increase in size and age, but usually exhibit strong site fidelity to rocky bottoms and outcrops. Yelloweye rockfish occur in waters ranging from 80 to 1,560 feet in depth (Orr et al. 2000; Drake et al. 2010). However, they most commonly occur between 300 and 590 feet. Since 1965, rockfish populations have declined 70 percent in the Puget Sound (Drake et al. 2010). As a result, yelloweye rockfish are now considered rare in the Puget Sound (Love et al. 2002; as cited in Drake et al. 2010). Individuals that may be present in Action Area 4 would likely be limited to very low numbers of pelagic larvae and pre-settlement juveniles that may occasionally pass through the area on currents. If present, larval and/or juvenile yelloweye rockfish are most likely to occur year-round.

Although critical habitat for yelloweye rockfish is designated within Action Area 4, it is located approximately 600 feet away from the Area 3 construction footprint.

## 2.10 Killer Whale - Southern Resident DPS

The killer whale, also known as the orca, is the most widely distributed marine mammal, found in every ocean in the world. Once believe to all belong to a single species, the orca is now divided into several subpopulations. The most common subpopulations include:

- Resident killer whales
- Transient killer whales, and
- Offshore killer whales.

The Southern Resident DPS is the only federally listed population of killer whale in the U.S. The Southern Resident DPS population is endangered and consists of only three known pods: J pod, K pod, and L pod. These individuals reside in the coastal waters throughout the inland waterways of Puget Sound, the Strait of Juan de Fuca, and the Strait of Georgia. Although they can be seen throughout the year in the Puget Sound, they have been spotted as far north as the Chatham Strait in Alaska during the spring, summer, and fall. During winter months their habitat ranges from the coastal waters off Washington, Vancouver Island, and central California. Resident killer whales often stay close to shore, entering coastal fjord systems, shallow bays, estuaries, and river mouths where there is freshwater input and seasonal concentrations of salmon (Krahn 2002; NOAA Fisheries 2020).

More than 75% of the Southern Resident killer whale's summer diet consists of Chinook salmon, particularly in the summer. In other times of the year, flatfish, rockfish and other salmonids including steelhead, sockeye *(Oncorhynchus nerka*), and chum salmon (*Oncorhynchus keta*) are found in this

whale's diet (Hanson et al. 2010). Therefore, this whale's population movements and connectivity seem to be correlated with coastwide movements and abundance of salmonids (NOAA Fisheries 2014). From late spring to early autumn, individuals are concentrated in the inland waters around the San Juan Islands, and then move south into Puget Sound in early autumn (NOAA Fisheries 2020). According to recent sightings, Southern Resident killer whales are seen in the southern Puget sound (Project Area and further south) during the months of August through March (OrcaNetwork 2022). As such, it is possible that Southern Resident DPS killer whales have the potential to be present within Action Area waters during August through March.

## 2.11 Humpback Whale - Mexico DPS and Central America DPS

Humpback whales live in all oceans around the world. They travel great distances every year and have one of the longest migrations of any mammal on the planet. Some populations swim 5,000 miles from tropical breeding grounds to colder, more productive, feeding grounds. Humpback whales feed on shrimp-like crustaceans (krill) and small fish, straining huge volumes of ocean water through their baleen plates, which act like a sieve (NOAA Fisheries 2022a).

Prior to whaling, humpbacks were common throughout the Puget Sound. Although whaling essentially removed this species from the Salish Sea, humpbacks have been steadily recovering from whaling since the 1980s. In the late 2000s, reported sightings in the Salish Sea, including most of the Puget Sound, have become common. Some individuals are even documented as staying throughout the winter months (Calambokidis et al. 2018). OrcaNetwork (2022) has reports of humpback whales in the Action Area during the months of October through May.

Of the 14 distinct population segments of humpback whales, four are federally listed as endangered, and one listed as threatened. Three of those, the Mexico DPS (threatened) the Central America DPS (endangered) and the Hawaii DPS (unlisted), are known to migrate through Puget Sound. Most of the humpback whales identified within the Salish Sea are from the Mexico DPS and Hawaii DPS, but a few are from the endangered Central America DPS (Calambokidis et al. 2017). The Mexico population breeds along the Pacific coast of Mexico and the Revillagigedo Islands, transits the Baja California peninsula, and feeds from California to the Aleutian Islands in Alaska. The Central American population breeds along the Pacific coast of Central America (including off Costa Rica, Panama, Guatemala, El Salvador, Honduras, and Nicaragua), and feeds off the West Coast of the United States and southern British Columbia. The Hawaii DPS breeds in the shallow Hawaiian Island waters and feeds in Alaskan waters.

Humpback whales feed during the spring, summer, and fall in cooler waters, then migrate to warmer waters to breed and calve. These whales filter-feed on small crustaceans and small fish and are known to hunt cooperatively in well-coordinated groups. They can usually be found close to shore and often engage in display activities near the surface, such as breaching or slapping the surface with their pectoral fins and tails (NOAA Fisheries 2022a).

Although uncommon in Elliott Bay, it is possible that federally listed humpback whales of the Mexico and Central America DPS groups could be present in the Action Area waters year-round. Individuals from the unlisted Hawaii DPS group could be present as well.

## 2.12 Critical Habitat

This section describes the status of designated critical habitat protected under the ESA within Action Area 4 that would be affected by the Base expansion and modernization program. The conditions and trends of physical and biological features (PBFs) that are essential to the conservation of the listed species have been examined. The PBFs are essential because they support one or more of the species' life stages.

Within Action Area 4, critical habitat has been designated for the Coastal/Puget Sound bull trout, the Puget Sound ESU Chinook salmon, the Puget Sound DPS steelhead, the bocaccio and yelloweye rockfish, and the Southern Resident DPS killer whale (see Figure 3.6-7 in the Programmatic Environmental Impact Statement [PEIS]). The following PBFs essential for these species' conservation are provided below.

### 2.12.1 *PBFs for Bull Trout*

1. Springs, seeps, groundwater sources, and subsurface water connectivity (hyporheic flows) to contribute to water quality and quantity and provide thermal refugia.
2. Migratory habitats with minimal physical, biological, or water quality impediments between spawning, rearing, overwintering, and freshwater and marine foraging habitats, including but not limited to permanent, partial, intermittent, or seasonal barriers.
3. An abundant food base, including terrestrial organisms of riparian origin, aquatic macroinvertebrates, and forage fish.
4. Complex river, stream, lake, reservoir, and marine shoreline aquatic environments and processes with features such as large wood, side channels, pools, undercut banks and substrates, to provide a variety of depths, gradients, velocities, and structure.
5. Water temperatures ranging from 36 to 59 degrees Fahrenheit (°F), with adequate thermal refugia available for temperatures at the upper end of this range. Specific temperatures within this range will vary depending on bull trout life-history stage and form; geography; elevation; diurnal and seasonal variation; shade, such as that provided by riparian habitat; and local groundwater influence.
6. Substrates of sufficient amount, size, and composition to ensure success of egg and embryo overwinter survival, fry emergence, and young-of-the-year and juvenile survival.
7. A minimal amount (e.g., less than 12%) of fine substrate less than 0.03 inches in diameter and minimal embeddedness of these fines in larger substrates are characteristic of these conditions.
8. A natural hydrograph, including peak, high, low, and base flows within historic and seasonal ranges or, if flows are controlled, they minimize departures from a natural hydrograph.
9. Sufficient water quality and quantity such that normal reproduction, growth, and survival are not inhibited.
10. Few or no nonnative predatory (e.g., lake trout [*Salvelinus namaycush*], walleye [*Sander vitreus*], northern pike [*Esox lucius*], smallmouth bass [*Micropterus dolomieu*]); inbreeding (e.g., brook trout [*Salvelinus fontinalis*]); or competitive (e.g., brown trout [*Salmo trutta*]) species present (75 FR 63695).

### 2.12.2 *PBFs for Chinook Salmon and Steelhead*

1. Freshwater spawning sites with water quantity and quality conditions and substrate supporting spawning, incubation and larval development;
2. Freshwater rearing sites with:
    a. Water quantity and floodplain connectivity to form and maintain physical habitat conditions and support juvenile growth and mobility;
    b. Water quality and forage supporting juvenile development; and
    c. Natural cover such as shade, submerged and overhanging large wood, log jams and beaver dams, aquatic vegetation, large rocks and boulders, side channels, and undercut banks.
3. Freshwater migration corridors free of obstruction with water quantity and quality conditions and natural cover such as submerged and overhanging large wood, aquatic vegetation, large rocks and boulders, side channels, and undercut banks supporting juvenile and adult mobility and survival;
4. Estuarine areas free of obstruction with:
    a. Water quality, water quantity, and salinity conditions supporting juvenile and adult physiological transitions between freshwater and saltwater;
    b. Natural cover such as submerged and overhanging large wood, aquatic vegetation, large rocks and boulders, side channels; and
    c. Juvenile and adult forage, including aquatic invertebrates and fishes, supporting growth and maturation.
5. Nearshore marine areas free of obstruction with:
    a. Water quality and quantity conditions and forage, including aquatic invertebrates and fishes, supporting growth and maturation; and
    b. Natural cover such as submerged and overhanging large wood, aquatic vegetation, large rocks and boulders, and side channels.
6. Offshore marine areas with water quality conditions and forage, including aquatic invertebrates and fishes, supporting growth and maturation (70 FR 52630).

### 2.12.3 *PBFs for Bocaccio and Yelloweye Rockfish*

1. Benthic sites deeper than 98.4’ that possess or are adjacent to areas of complex bathymetry consisting of rock and/or highly rugose habitat;
2. Quantity, quality, and availability of prey species to support individual growth, survival, reproduction, and feeding opportunities;
3. Water quality and sufficient levels of dissolved oxygen to support growth, survival, reproduction, and feeding opportunities; and
4. Structure and rugosity to support feeding opportunities and predator avoidance (NMFS 2014).

### 2.12.4 *PBFs for Southern Resident DPS Killer Whales*

1. Water quality to support growth and development;
2. Prey species of sufficient quantity, quality, and availability to support individual growth, reproduction and development, as well as overall population growth; and

3. Passage conditions to allow for migration, resting, and foraging (71 FR 69054).

## 3.0 SPECIES PROTECTED UNDER THE MMPA

Several species of marine mammals may occur in the nearshore embayment and river delta habitats of Elliott Bay and the lower Duwamish River. Those species protected under the MMPA with the potential of being located within the in-water Action Area during project implementation are discussed below.

### 3.1 Harbor Seal

Harbor seal populations have expanded substantially in Puget Sound since afforded protection by the MMPA in 1972. They are common residents in central Puget Sound and Elliott Bay and tend to haul-out on floats and other human-made structures. Harbor seal haul-out sites are scattered throughout southern Puget Sound on intertidal rocks and reefs, log booms, and recreational floats (Jeffries et al. 2000). However, the largest haul-out sites are located at Gertrude Island, Woodard Bay, and Nisqually River. Harbor seals are expected to occur year-round within Action Area 4. However, their occurrence would likely only be for brief periods due to the lack of adequate haul out spots on, or adjacent to, the project site.

### 3.2 California Sea Lion

In the Puget Sound, the population of California sea lions consists mainly of males during the winter months of October through May as their female mates generally remain behind in the breeding grounds of Mexico and California (Jeffries et al. 2000). The predominant California sea lion haul-out and rafting area is located near the Shilshole Bay Marina. Smaller numbers of sea lions (mostly California sea lions) are also regularly found on navigation buoys from the Nisqually Delta to Port Townsend. The closest documented seal/sea lion haul-out site is located approximately 5 miles west/southwest of the Action Area off of Alki Point with less than 100 individuals (Jeffries et al. 2000) (see Figure 3.6-6 in the PEIS). Although likely to peak in numbers during late fall through spring, California sea lions have the potential to be present within Action Area 4 throughout the year. However, their occurrence would likely only be for brief periods of time due to the lack of adequate haul out spots on, or adjacent to, the project site.

### 3.3 Stellar Sea Lion

Steller sea lions are relatively rare in Central Puget Sound; most often being observed off the coast of Washington, the Strait of Juan de Fuca, and the northern Puget Sound/Georgia Strait (Coast Guard 2006; Isakson et al. 1981). Breeding rookeries are found in Oregon and British Columbia, but none are found in Washington. Steller sea lions generally occur from October to July in Washington, with peak counts in the fall and winter months. The closest haul-out area for Stellar sea lions is south of Fox Island near Steilacoom (Jeffries et al. 2000). As they are considered rare in the area, stellar sea lions are not likely to occur within Action Area 4. However, isolated occurrences throughout the year cannot be ruled out.

### 3.4 Dall's Porpoise

The Dall's porpoise is the largest of all porpoises. They are fast and can swim up to 34 miles per hour. Their stocky bodies are marked distinctively with a black and white color pattern. They tend to live in groups of up to 12 but may occasionally congregate in pods of a few hundred or more. While most porpoise species are shy of humans, Dall's porpoises are known to seek out large, fast, boats to bow-ride. This species lives in the North Pacific Ocean and adjacent seas from southern California and southern Japan up to the central Bering Sea in Alaska. They are oceanic, cold-water, porpoises and prefer deep coastal and offshore water habitats (NOAA Fisheries 2022b). Dall's porpoises occur in inland Washington areas at all times of the year. However, their presence within Action Area 4 would be rare and may only occur seasonally during the winter months (Nysewander et al. 2005). As they are

considered rare in the area, Dall's porpoises are not likely to be found within Action Area 4. However, isolated winter occurrences cannot be ruled out (October to February).

## 3.5 Harbor Porpoise

The harbor porpoise was a common year-round resident in the Puget Sound in the 1940s, but by the 1970s, they had disappeared from Puget Sound. Their numbers had also been greatly reduced in the Straits of Georgia and Juan de Fuca and around the San Juan Islands. A variety of factors led to the harbor porpoise's decline during the 1970s through 1990s, including interactions with fisheries (i.e., bycatch from fishing nets) and pollution of the inner marine waters (Evenson et al. 2016).

With the reduction of threats, the Washington Inland Waters Stock of harbor porpoise has rebounded over the last 20-25 years to its current level, which may be at its historical high (WDFW 2022d). The harbor porpoise is considered common in the Puget Sound and is expected to occur year-round within Action Area 4.

## 3.6 Humpback Whale

As stated above, three humpback whale DPSs, the Mexico DPS (threatened), the Central America DPS (endangered), and Hawaii DPS (unlisted) are known to migrate through Puget Sound. Humpback whales have been reported in the central Puget Sound during the months of October through May (OrcaNetwork 2022). Therefore, it is possible that individuals from all three DPS groups could be present within Action Area 4 year-round.

## 3.7 Gray Whale

Prior to commercial whaling, gray whales were once common throughout the Northern Hemisphere. Since then, their range has been reduced to the North Pacific Ocean where there are two extant populations; the Western North Pacific DPS and the Eastern North Pacific DPS.

Gray whales are primarily bottom feeders that consume a wide range of benthic and epibenthic invertebrates. They suck sediment and food from the sea floor by rolling on their sides and swimming slowly along, filtering their food through coarse baleen plates on each side of their upper jaw. Most eastern North Pacific stock gray whales spend the summer feeding in the northern Bering and Chukchi seas. However, some feed in waters off Southeast Alaska, British Columbia, Washington, Oregon, and northern California during the summer (NOAA Fisheries 2022c). In the central Puget Sound, gray whales are occasionally reported during all months of the year (OrcaNetwork 2022).

Because gray whales are considered rare in the Puget Sound, they are not likely to occur within Action Area 4. However, isolated spring occurrences cannot be ruled out (March to May).

## 3.8 Killer Whale

Killer whales are a top predator in the food chain and are considered the most widely distributed marine mammal in the world. Killer whales have a wide range of diets; however, different populations are specialized in their behavior and diet. In the Puget Sound, two stocks are present; the listed Southern Resident DPS killer whales which eat fish exclusively, mainly salmon (NOAA 2020), and the unlisted transient killer whales which feed mainly on marine mammals.

The Southern Resident DPS killer whale's population movements and connectivity is correlated with coastwide movements and abundance of Chinook salmon (NOAA Fisheries 2014). According to recent sightings, Southern Resident killer whales are seen in the southern Puget Sound during the months of

August through March (Orca Network 2022). This loosely correlates with the return of adult Chinook salmon to the Green River for spawning between August and November. Therefore, Southern Resident DPS killer whales are expected to occur in Action Area 4 between September to May.

Transient killer whales occur year-round in the Puget Sound (NOAA Fisheries 2020). This is because their marine mammal food sources are also present throughout the year (e.g., harbor porpoise, harbor seals). Therefore, Transient DPS killer whales are expected to occur year-round within Action Area 4.

## 3.9 Minke whale

Minke whales are not listed under the ESA and are classified as "non-depleted" under the MMPA. They prefer temperate to boreal waters, but are also found in tropical and subtropical regions, found in both coastal/inshore and oceanic/offshore waters. Minke whales are usually sighted individually or in small groups of two to three, with some reports of loose aggregations of up to 400 animals but at higher latitudes. They migrate seasonally, capable of traveling long distances; however, some have small home ranges and are not highly migratory (NOAA 2020c).

Older males are commonly found in polar regions in and near the ice edge. Mature females also migrate farther into the higher latitudes, but generally stay in coastal waters. Immature minke whales are more solitary and usually stay in lower latitudes in the summer. In the U.S., those in the inland waters of California, Oregon, and Washington are considered residents because they establish home ranges (NOAA 2020c).

This California/Oregon/Washington stock may occasionally be found near Action Area 4 from September to January. However, although they are relatively common in the San Juan Islands and Strait of Juan de Fuca, they are relatively rare in Puget Sound. No minke whales have been reported inside Action Area 4 by Orca Network in 2017 (Orca Network 2017). None have been observed during monitoring for the Elliot Bay Seawall Project (EBSP), the 2012 Seattle Slip 2 Batter Pile Project, or the 2016 Seattle Test Pile Project (Anchor QEA 2014, 2015, 2016, and 2017; WSF 2012, 2016). In October 2019, one minke whale was observed during monitoring for the Colman Dock Project (WSDOT, unpublished data), and no minke whales were documented as Level B takes during marine mammal monitoring over 51 days during October 20, 2020 to February 10, 2021, for the Waterfront Park Emergency Demolition (Anchor QEA 2021).

## 3.10 Northern elephant seal

Northern elephant seals are not currently listed under the ESA. No critical habitat has been designated for this species. They are not considered to be a "depleted" or "strategic" stock under the MMPA. Northern elephant seals are found in the eastern and central North Pacific Ocean, ranging as far north as Alaska and as far south as Mexico (NOAA 2016a, 2016b). They typically breed in the Channel Islands of California or Baja California, primarily on offshore islands (Stewart et al. 1994) from December to March (NOAA 2015). They were once thought to be extinct from commercial sealing in the 1800s; however, the population has steadily increased in the early 1900s (NOAA 2016a, 2016b).

Male northern elephant seals migrate to the Gulf of Alaska and western Aleutian Islands along the continental shelf to feed on benthic prey. Females migrate to pelagic areas in the Gulf of Alaska and the central North Pacific Ocean to feed on pelagic prey (Le Boeuf et al. 2000). The adults return to land between March and August to molt. The males return later than the females. The adults return to their feeding areas between their spring/summer molting and their winter breeding seasons (NOAA 2015).

The occurrence of elephant seals within Action Area 4 is unlikely. Although this species has been observed near Action Area 4 during non-project activities, they were not observed during monitoring efforts performed for the Pier 62 Project (Anchor QEA 2018 and 2019), the EBSP (Anchor QEA 2014, 2015, 2016, and 2017), the Waterfront Park Emergency Demolition (Anchor QEA 2021), the 2012 Seattle Slip 2 Batter Pile Project, and the 2016 Seattle Test Pile Project (WSF 2012, 2016).

## 3.11 Long-beaked common dolphin

The California stock of long-beaked common dolphins is not currently listed under the ESA. No critical habitat has been designated for this species. They are not considered to be a "depleted" or "strategic" stock under the MMPA. Long-beaked common dolphins are relatively small dolphins commonly found along the U.S. West Coast, from Baja California (including the Gulf of California), northward to about central California (NOAA 2020a). Long-beaked common dolphins inhabiting the west coast U.S. waters are considered to be in the California stock (Caretta et al. 2019, 2020).

Long-beaked common dolphins prefer shallow, tropical, subtropical and warmer temperate waters closer to the coast, usually within 50 to 100 nautical miles and on the continental shelf. They are usually found in large social groups of 100 to 500 animals but have also been seen in groups numbering in the thousands. These larger groups are thought to comprise several smaller subgroups separated by age and/or sex (NOAA 2020a).

Although this species is commonly found along the West Coast, they are rarely observed in inland Washington waters. No long-beaked common dolphins were observed during 104 monitoring days during Seasons 1 and 2 of the Pier 62 Project (Anchor QEA 2018 and 2019), during 175 monitoring days during Seasons 1, 2, 3, and 4 of the EBSP (Anchor QEA 2014, 2015, 2016, and 2017), during 51 days of monitoring between October 20, 2020 and February 10, 2021 for the Waterfront Park Emergency Demolition (Anchor QEA 2021), the 2012 Seattle Slip 2 Batter Pile Project, and the 2016 Seattle Test Pile Project (WSF 2012, 2016). However, the first observation of long-beaked common dolphin in the Puget Sound was reported in the summer of 2016 (Orca Network 2016).

## 3.12 Bottlenose dolphin

The California/Oregon/Washington offshore stock of bottlenose dolphins is not currently listed under the ESA. No critical habitat has been designated for this species. They are not considered to be a "depleted" or "strategic" stock under the MMPA. Bottlenose dolphins are found in temperate and tropical waters around the world, and coastal and offshore stocks generally inhabit different waters. Those that inhabit the west coast U.S. waters are considered to be either the California stock (ranging from Mexico to the San Francisco area) or the California/Oregon/Washington offshore stock. Most of the latter are sighted offshore of California northward to the Oregon border (NOAA 2020b). This stock is more likely to occur in the project area.

Bottlenose dolphins primarily feed on invertebrates, squids, and fish, foraging individually or in groups. They are long-lived and females can be greater than 50 years old. They use echolocation to locate and capture prey and use their flukes to strike fish out of the water. They are commonly found in groups of 2 to 15, and in hundreds in offshore environments (NOAA 2020b).

Bottlenose dolphins are not expected to occur in Action Area 4 although the possibility does exist. No specimens were observed during NOAA offshore surveys from 1991 to 2014 off the Oregon or Washington coasts (Caretta et al. 2019), during marine mammal monitoring over 51 days between October 20, 2020 and February 10, 2021 for the Waterfront Park Emergency Demolition (Anchor QEA

2021), during the monitoring for the Pier 52 Project, the EBSP, the 2012 Seattle Slip 2 Batter Pile Project, or the 2016 Seattle Test Pile Project (Anchor QEA 2014, 2015, 2016, 2017, and 2018; WSF 2012, 2016). However, there were multiple sightings of a specimen that were reported to the Orca Network throughout the Puget Sound and in Elliot Bay. During monitoring for the Colman Dock Project, four individuals were observed in Elliot Bay during 99 days of monitoring (WSDOT 2019).

## 4.0 SPECIES PROTECTED UNDER THE MIGRATORY BIRD TREATY ACT (MBTA)

The Migratory Bird Treaty Act of 1918 (MBTA) is intended to ensure the sustainability of populations of all protected migratory bird species by prohibiting the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the USFWS (USFWS 2020). The following sections present information for all migratory bird species that are documented as having the potential to occur in the upland Action Areas, as provided by the USFWS in their official species request results provided in Appendix H.

### 4.1 Bald Eagle

Bald eagles (*Haliaeetus leucocephalus*) are found in coastal areas or near large inland lakes and rivers with abundant fish and large trees. Overwintering bald eagles may fly over the general area during the winter. In the Puget Trough ecoregion, bald eagles are considered fairly common to common year-round. Their presence and behavior were documented from four locations within inner Elliott Bay. No nests are located within the East Waterway, but birds have been documented perching on mature trees to forage south of the Duwamish Head and on dolphins and moored barges in inner Elliott Bay (USACE 1994). Therefore, this species is expected to perch and forage within the Action Areas. The bald eagle is also protected under the Bald and Golden Eagle Protection Act (BGEPA) enacted in 1940 (see Section 4.0 below).

### 4.2 Black Swift

Black swifts (*Cypseloides niger*) are summer residents in Washington, arriving in late spring and departing in early fall. They require specialized habitats for nesting in forested areas near rivers, often behind waterfalls or on damp cliffs. Their foraging habitat is more general in open sky over mountains or coastal cliffs. This species is uncommon in the Puget Trough from May to September. Since suitable nesting and foraging habitat does not exist within the Action Areas, this species is not expected to occur.

### 4.3 Black Turnstone

The black turnstone (*Arenaria melanocephala*) is a coastal species that nests in coastal Alaska but migrates and winters along the rocky shorelines of the Pacific Coast where they forage along rocky shores, islets, and kelp beds. They migrate to breeding grounds starting in mid-May and are common again in mid-July. Since they are common throughout most of the year in coastal Washington and the Puget Trough, they are expected to forage within the Action Areas.

### 4.4 Clark's Grebe

Clark's grebe (*Aechmophorus clarkii*) breed in colonies in central arid steppe and Big Sage/Fescue zones. Clark's grebe is considered fairly common in Grant County in northeastern Washington in the summer. In winter, they are mainly found on western lakes and saltwater bays in southwest Washington. They forage mainly on fish in wetlands during the breeding months, and deeper sea water during the winter. The Clark's grebe is considered rare in the Puget Trough from October to January. Since suitable nesting and foraging habitat does not exist within the Action Areas, this species is not expected to occur.

### 4.5 Evening Grosbeak

The evening grosbeak (*Coccothraustes vespertinus*) breeds in mixed conifer forests. They forage for seeds and invertebrates in trees and shrubs and nests in broadleaf trees, particularly fruiting shrubs. In

the Puget Trough, the evening grosbeak is considered fairly common year-round but does not breed in this ecoregion. Therefore, this species is only expected to briefly forage within the Action Areas.

## 4.6 Lesser Yellowlegs

Lesser yellowlegs (*Tringa flavipes*) breed in open boreal forest in northern Canada and Alaska during the summer months. During the winter months and migration, they occur on coasts, marshes, lakeshores, and mudflats, particularly in protected (i.e., smaller, less open) areas. Their diet during breeding consists of insects but, during migration and winter, may include crustaceans and small fish. In the Puget Trough ecoregion, they are considered uncommon in spring (i.e., April and May) but fairy common during the fall migration (i.e., August and September). Therefore, this species has the potential to be foraging within the Action Areas during fall migration.

## 4.7 Olive-sided Flycatcher

Olive-sided flycatchers (*Contopus cooperi*) breed in logged areas, clearings and edges of boreal or mountainous forests. During migration, they can also be found in open habitats with a mixture of woods and clearings. In the Puget Trough, they are considered rare to fairly common from April to September. Since suitable nesting and foraging habitat does not occur within the Action Areas, this species is not expected to occur.

## 4.8 Rufous Hummingbird

Rufous hummingbirds (*Selasphorus rufus*) occur in many habitats in western Washington. They often build nests in the same location each year in bushes and drooping conifer branches along forest edges and clearings, or brushy second growth habitat within the northern coastal region and mountains. Their diet is insects, flower nectar, and sugar-water provided by hummingbird feeders in residential settings. In the Puget Trough, they are considered common during the summer months (April to July) and rare to uncommon in February to March and August to September. Therefore, this species has the potential to be foraging within the Action Areas during the summer.

## 4.9 Short-billed Dowitcher

The short-billed dowitcher (*Limnodromus griseus*) breeds in open marshes in boreal forests. During migration and winter, they are often found in salt marshes or mudflats where they feed on insects, mollusks, crustaceans, and other invertebrates. In the Puget Trough ecoregion, they are considered rare to fairly common from April to October. Because nesting and foraging habitat does not occur within the Action Areas, this species is not expected to occur.

## 5.0 SPECIES PROTECTED UNDER THE BALD AND GOLDEN EAGLE PROTECTION ACT (BGEPA)

The bald eagle and golden eagle are afforded protection under the BGEPA. Enacted in 1940, the BGEPA prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. Both of these species are discussed below.

### 5.1 Bald Eagles

As stated above, bald eagles have been documented perching on mature trees to forage south of the Duwamish Head and on dolphins and moored barges in inner Elliott Bay (USACE 1994). Therefore, this species is expected to occur year-round within the Action Areas.

### 5.2 Golden Eagles

Golden eagles (*Aquila chrysaetos*) nest in open areas with large rocky cliffs or large trees, often in alpine parkland, mid-elevation clear-cuts, shrub-steppe, and open forests. They forage on mid-sized mammals and occasionally carrion. In the Puget Trough ecoregion, they are considered rare year-round. Since mid-sized mammals and nesting habitat does not occur in the Action Areas, this species is not expected to occur.

## 6.0 ESSENTIAL FISH HABITAT (EFH)

This section describes the status of designated EFH and Habitat Areas of Particular Concern (HAPCs) within the in-water Action Area 4 that have the potential to be affected by the proposed expansion and modernization program. EFH, HAPCs, and EFH Areas Protected from Fishing are protected under the Magnuson–Stevens Fishery Conservation and Management Act (MSA).

Designated EFH and HAPCs within Action Area 4 are managed under the following three fishery management plans (FMPs):

- The Pacific Coast Salmon FMP
- The Pacific Coast Groundfish FMP; and
- The Coastal Pelagic Species (CPS) FMP.

The Pacific Coast Salmon FMP, Amendment 21 (Pacific Fishery Management Council [PFMC] 2021) describes EFH for three Pacific Coast salmon species, including the Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*Oncorhynchus kisutch*) and the Puget Sound pink salmon (*Oncorhynchus gorbuscha*). The Pacific Coast Groundfish FMP, Amendment 19 and 28, discusses the EFH for over 80 groundfish species (71 FR 27408 and 2020), and the CPS FMP, defines EFH for four finfish species (i.e., Pacific sardine (*Sardinops sagax*), Pacific (chub) mackerel (*Scomber japonicus*), northern anchovy (*Engraulis mordax*), and jack mackerel [*Trachurus symmetricus*]) and one invertebrate (i.e., market squid [*Doryteuthis opalescens*]) (PFMC 1998 and 2019).

There are no EFH Areas Protected from Fishing designated within the Action Area.

### 6.1.1 *Pacific Coast Salmon EFH*

Pacific coast salmon EFH is defined as “those waters and substrate necessary for salmon production needed to support a long-term sustainable salmon fishery and salmon contributions to a healthy ecosystem.” EFH is only designated for species that are federally managed and are included in a fishery management unit. Estuarine and marine EFH includes all coastal waters from the extreme high tide line within state territorial waters to the full extent of the EEZ, which is 200 nautical miles offshore of Washington, Oregon and north of Point Conception, California. Freshwater habitat is designated based on watersheds known to currently or historically be inhabited by managed salmon species. In this watershed-based approach, EFH was designated based on USGS 4th field hydrologic units throughout Washington, Oregon, California, and Idaho (PFMC and NMFS 2014).

There are five HAPCs within designated Pacific Coast salmon EFH. These HAPC’s include:

1. Complex channels and floodplain habitats;
2. Thermal refugia;
3. Spawning habitat;
4. Estuaries; and
5. Marine and estuarine submerged aquatic vegetation (SAV).

The HAPCs provide additional focus for conservation efforts by highlighting types of areas which are of high ecological importance to the lifecycle of Pacific Coast salmon.

The entire in-water Action Area contains estuarine/marine EFH for salmon. In addition, because the lower Duwamish River and Elliott Bay are estuarine in nature, the Action Area is also designated as

containing a HAPC. Because SAV (e.g., eelgrass and bull kelp [*Nereocystis luetkeana*]) has been documented within the Puget Sound, particularly in shallow water areas, the SAV HAPC may also apply to Action Area 4. The Action Area, however, does not provide complex channels and floodplain habitats, thermal refugia, or spawning habitat.

### 6.1.2 *Pacific Coast Groundfish Species EFH*

The Pacific Coast Groundfish FMP manages more than 80 groundfish species over a large, ecologically diverse area. The FMP states, "the description and identification of EFH must include habitat for an individual species, but may be designated for an assemblage of species, if appropriate to the FMP." Therefore, the PFMC designated an overall area for groundfish EFH, which includes the habitat requirements of all managed species (PFMC 2020).

Groundfish EFH ranges from the Canada/Washington border in the north, south to the California/Mexico border (71 FR 27408 and 2020). In aggregate, groundfish EFH is identified as all waters and substrates within the following areas:

- Waters and substrate less than or equal to 3,500 meters deep (relative to MHHW), or the upriver extent of saltwater intrusion, upstream and landward to where ocean-derived salts measure less than 0.5 parts per thousand during average annual flow.
- Seamounts in depths greater than 3,500 meters deep
- Areas designated as HAPCs which have not been included in the above criteria.

There are four habitat types and additional Specific Areas of Interest designated as HAPCs for groundfish in Washington. Habitat Types include: 1) Estuaries; 2) Canopy Kelp; 3) Seagrass; and 4) Rocky Reefs. Specific Areas of Interest in Washington include: All waters and sea bottoms located in State waters, shoreward from the three-nautical mile boundary of the territorial sea to the MHHW.

Within the project Action Area, all waters are considered EFH and a Specific Area of Interest for groundfish species. Because the lower Duwamish River and Elliott Bay are estuarine in nature, the Action Area is also designated as containing a HAPC. SAV (e.g., eelgrass and bull kelp) has been documented within the Puget Sound, particularly in shallow water areas. Therefore, the canopy kelp and seagrass HAPCs may also apply to Action Area 4. The Action Area also provides rocky reef habitat south of Slip 36. However, this HAPC is limited.

### 6.1.3 *Coastal Pelagic Species EFH*

The EFH criteria for CPS are defined by a thermal range within the geographic locations where managed pelagic species are known to exist, have historically resided during periods of similar environmental conditions, or where environmental conditions do not preclude habitation by the pelagic species. Thus, the EFH for CPS is dynamic, and depends upon the temperature of the upper mixed layer of the ocean.

Although the range of CPS species is predominantly in warmer, open coastal, environments south of Washington State, their east-west EFH orientation is defined as all estuarine and marine waters from the shoreline of Washington, Oregon, and California to the EEZ boundary. It is further classified as waters above the thermocline where sea surface temperatures range between 10 and 26 degrees Celsius (°C). The northern extent of the EFH varies based on seasonal water temperatures but exists at the location of the 10°C isotherm. The southern boundary of the CPS EFH is the US/Mexico border (PFMC 1998 and 2019).

Because the EFH zone changes with seasonal water temperatures, there are no definitive maps. The greater Seattle area, however, is reported as having maximum surface water temperatures ranging between 10 and 26°C from June to November (SeaTemperature.org 2022). Therefore, the CPS EFH criterion would be met within Action Area 4 during these warmer seasonal months.

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# Appendix N:
# Environmental Noise Analysis

# Appendix A
# Environmental Noise Analysis

Sound is expressed in decibels (dB), a unit of measure based on a logarithmic scale. A 10-dB increase in noise level corresponds to a 100-percent increase (or doubling) in perceived loudness. As a general rule, a 3-dB change is necessary for noise increases to be noticeable to humans (Bies and Hansen 1988). Sound measurements for the human environment typically uses an A-weighted decibel (dBA) scale that emphasizes the range of sound frequencies that are most audible to the human ear (i.e., between 1,000 and 8,000 cycles per second). Sound frequency is measured in terms of hertz (Hz), and the normal human ear can detect sounds ranging from approximately 20 to 15,000 Hz. Because all sounds in this wide range of frequencies are not heard equally well by the human ear, which is most sensitive to frequencies in the 1,000 to 4,000 Hz range, the very high and very low frequencies are adjusted to approximate the human ear's lower sensitivity to those frequencies. This is called "A-weighting" and is commonly used in measurement of community environmental noise. Unless otherwise noted, all dB measurements presented in the following noise analysis are in dBA.

Day-night average A-weighted sound level (DNL) is a noise metric that averages all A-weighted SEL values over a 24-hour period, with an additional 10-dB penalty added to noise events occurring between 10:00 p.m. and 7:00 a.m. This penalty is intended to compensate for lower background noise levels at night and the additional annoyance of nighttime noise events (i.e., while people are sleeping). DNL is the preferred noise metric of the U.S. Department of Housing and Urban Development, U.S. Department of Transportation, Federal Aviation Administration, and U.S. Environmental Protection Agency.

The City of Seattle noise ordinance establishes specific limits on the intensity and timing of noise resulting from construction activities. Using the maximum permissible noise levels (see Table 1) as a baseline, the Seattle ordinance sets maximum levels and durations of permissible daytime construction noise. Daytime hours are defined as 7:00 am to 10:00 pm on weekdays and 9:00 am to 10:00 pm on weekends and holidays. If nighttime construction were to occur, it would not be permitted to exceed the City of Seattle's maximum permissible noise levels for operational noise. Because most construction equipment is loud, construction noise often cannot comply with the City of Seattle nighttime noise limits. Table 1 provides a summary of the Seattle noise ordinance limits for operational and construction noise.

***Table 1 City of Seattle Noise Ordinance Limits***

| Zoning District of Noise Source | Zoning District of Receiving Property | | |
|---|---|---|---|
| | Residential Day/Night (dBA) | Commercial (dBA) | Industrial (dBA) |
| **Operational Noise Limits** | | | |
| Residential | 55/45 | 57 | 60 |
| Commercial | 57/47 | 60 | 65 |
| **Industrial[1]** | **60/50** | **65** | **70** |
| **Daytime Construction Noise Limits[2]** | | | |
| **On-Site Noise Sources[3] (Operational Noise Limit + 25 dB)** | | | |
| Residential | 80 | 82 | 85 |
| Commercial | 82 | 85 | 90 |
| **Industrial[1]** | **85** | **90** | **95** |
| **Portable Noise Sources[4] (Operational Noise Limit +20 dB)** | | | |
| Residential | 75 | 77 | 80 |
| Commercial | 77 | 80 | 85 |
| **Industrial[1]** | **80** | **85** | **90** |

Notes:
[1] Bolded table entries reflect applicability to proposed activities at Base Seattle where Base Seattle is considered equivalent to an Industrial Zone District Noise Source and applicable City of Seattle Noise Ordinance Limits by receiving property zoning type
[2] Daytime construction noise limits measured at 50 feet or a real property line, whichever is greater; construction noise is limited to the higher levels listed.
[3] On-site noise sources include dozers, loaders, power shovels, cranes, derricks, graders, off-highway trucks, ditchers, and pneumatic equipment.
[4] Temporary equipment used in support of construction, such as generators, compressors, and powered hand tools.
Impact (impulsive) types of equipment (e.g., pavement breakers, pile drivers, jackhammers, sandblasters) may exceed maximum permissible limits between 8:00 a.m. and 5:00 p.m. on weekdays and 9:00 a.m. and 5:00 p.m weekends, but may not exceed the following limits:

| | | |
|---|---|---|
| Equivalent continuous sound level (Leq) | Leq (1 hour) – 90 dBA | Leq (30 minutes) – 93 dBA |
| | Leq (15 minutes) – 96 dBA | Leq (7.5 minutes) – 99 dBA |

Sound propagates through different media (i.e., air versus water) at different rates and the intensity of sound decreases over distance as the acoustic pressure wave spreads from the source (transmission loss [TL]). The TL is applied to each of the different activities to determine the degree to which construction- or operations-generated noise would decrease over distance to the nearest noise-sensitive use. TL parameters vary with frequency, temperature, source and receiver position. The general formula for transmission loss is:

$$TL = B * \log10(R) + C * R, \text{ where}$$

B = logarithmic (predominantly spreading) loss

C = linear (scattering and absorption) loss

R = ratio of receiver distance to source reference distance (50 feet in this case)

The C value is strongly dependent on frequency but is conservatively assumed to equal zero. For airborne noise the B value has a value of 20 for spherical spreading.

Given a noise level at a specified distance, it is possible to use this equation to calculate the distance at which the noise level would fall below a certain level (e.g., City of Seattle Noise Ordinance threshold).

$$TL = (S_0 \text{ Known noise level at reference distance}) - (S_1 \text{ Ordinance Threshold})$$

$$R = (R_1 \text{ Unknown threshold distance}) / (R_0 \text{ Reference Distance (50 feet in this case)})$$

$$(S_0 - S_1) = 20 * \log_{10} (R_1 / 50)$$

$$R_1 = 50 * 10^{((S_0 - S_1)/20)}$$

***Table 2 Average Maximum Noise Levels at 50 Feet for Common Construction Equipment and Estimated Sound Level after Decay to Nearest Residential Use***

| Construction Equipment | Measured Average Maximum Sound ($L_{max}$) at 50 feet (dB) | Equipment-Specific Ordinance Limit (dB) | Distance from Source for Sound to Fall Off Below Ordinance Limit (feet) |
|---|---|---|---|
| Backhoe | 84 | 85 | 44.6 |
| Concrete mixer truck | 82 | 85 | 35.4 |
| Concrete pump truck | 89 | 85 | 79.2 |
| Concrete saw | 85 | 85 | 50.0 |
| Crane | 79 | 85 | 25.1 |
| Dozer | 86 | 85 | 56.1 |
| Drum mixer | 74 | 85 | 14.1 |
| Dump truck | 92 | 85 | 111.9 |
| Excavator | 87 | 85 | 62.9 |
| Front end loader | 81 | 85 | 31.5 |
| Generator | 68 | 80 | 12.6 |
| Impact pile driver | 105 | 85 | 500.00 |
| Jackhammer (Asphalt/concrete) | 95 | 85 | 158.1 |
| Paving – Asphalt (Paver + Dump Truck) | 82 | 85 | 35.4 |
| Paving – Concrete (Placer + Slipform Paver) | 91 | 85 | 99.8 |
| Power Tools – Air Hose | 98 | 80 | 397.2 |
| Power Tools – Grinder | 73 | 80 | 22.3 |
| Power Tools – Impact Wrench | 74 | 80 | 25.1 |
| Power Tools – Reciprocating Saw | 66 | 80 | 10.0 |
| Sand Blasting | 103 | 85 | 397.2 |
| Tractor | 84 | 80 | 79.2 |
| Vibratory Pile Driver[1] | 105 | 85 | 500.0 |
| Welder / Torch | 75 | 80 | 28.1 |

Source: WSDOT 2020

[1]Inclusive of vibratory equipment used to install subsurface stone columns to increase ground stability

# Appendix O:
# Summary of Cleanup Sites

**Table O-1 Summary of Cleanup Sites**

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| **Superfund Sites** | | | | | | | | | | |
| Harbor Island Superfund Site (East Waterway Operable Unit) | **Marine Sediments:** polychlorinated biphenyls (PCBs), arsenic, mercury, dioxins/furans, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) | The Coast Guard is conducting a non-time-critical removal action (NTCRA) at Slip 36 under an Administrative Settlement and Order of Consent (ASAOC) with the U.S. Environmental Protection Agency (USEPA) | - | X | | | X | X | | |
| **Ecology Cleanup Sites (Currently Listed as Cleanup Started)** | | | | | | | | | | |
| Emerald City Disposal Site (Cleanup Site ID: 6717) | **Soil:** gasoline<br><br>**Surface Water:** halogenated organics | The three leaking Underground Storage Tanks (USTs) have been removed. The Coast Guard has listed this site as an environmental liability and will prioritize | - | X | | | | | | |

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| | | cleanup through its Environmental Compliance and Restoration (EC&R) Program | | | | | | | | |
| U.S. General Services Administration Federal Warehouse (Cleanup Site ID: 6842) | **Soil:** diesel<br><br>**Groundwater:** diesel | The leaking USTs have been removed and the area beneath the tanks have been cleaned up to the maximum extent practicable. Based on the results of the most recent site investigations, no further assessment is necessary. | Utility and construction workers should be informed of the presence of residual diesel contamination and should wear protective clothing when disturbing soils across these areas where contaminated soils are left in-place | X | | | | | | |

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| U.S. Coast Guard Pier 35 (Cleanup Site ID: 10181) | **Soil**: gasoline<br><br>**Groundwater:** gasoline, TCE | Three USTs haven been decommissioned and removed | - | X | | | | | | |
| Terminal 46 (Cleanup Site ID: 7005) | **Soil:** gasoline and diesel | The leaking USTs were removed. No further action is required until adjacent structures are removed, at which time the remaining petroleum hydrocarbons could be removed. | - | | | | X | | | |
| GATX Facility (Cleanup Site ID: 2543) | **Soil:** petroleum hydrocarbons, PAHs, and metals<br><br>**Groundwater:** petroleum hydrocarbons, PAHs, and metals | Approximately 32,000 cubic yards (cy) of contaminated soils was excavated and an Air Sparge treatment system was operated on the site. Monitoring data indicate that trigger levels provided in the Groundwater Compliance Monitoring Plan have been | - | | | | | X | | |

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| | | satisfied for all 5 years since the Air Sparge system was shut down. Based on this information, no further monitoring is required at the site. | | | | | | | | |
| Terminal 30<br>(Cleanup Site ID: 4394) | **Soil:** gasoline, diesel, and other petroleum hydrocarbons<br><br>**Groundwater:** petroleum hydrocarbons and light non-aqueous phase liquid | In 2017, the Department of Ecology issued a consent decree for remediation. Installation of an Air Sparge/Soil Vapor Extraction system was completed in 2019 to accomplish the required remediation. The latest quarterly monitoring report (October 1 through December 31, 2021) indicates that the system continues to operate and remove | - | | | | | X | | |

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| | | contaminates as described in the Cleanup Action Plan (CAP). | | | | | | | | |
| **Ecology Cleanup Sites (Currently Listed as Cleanup Complete)** | | | | | | | | | | |
| Marine Disposal Corp (Cleanup Site ID: 213) | **Soil:** halogenated organics | The site was previously remediated and the status of the site has been listed as No Further Action since September 1995 | - | X | | | | | | |
| **Ecology Cleanup Sites (Currently Listed as No Further Action Required)** | | | | | | | | | | |
| U.S. Coast Guard Pier 36 (Cleanup Site ID: 10182) | **Soils:** petroleum hydrocarbons | The site has been previously remediated and the status of the site has been listed as No Further Action since February 2013 | - | X | | | | | | |
| Flint Ink Site (Cleanup Site ID: 10154) | **Soil:** cPAHs, chlorinated hydrocarbons, lead, chromium, | The site has undergone remediation and the status was changed to No Further Action | - | | | | | | | X |

| Site Name | Constituents of Concern | Status | Previously Identified Land Use Controls | Affected Properties | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Base Seattle | BNSF Railway | Belknap | Terminal46 | Terminal 30 | Jack Perry Park | MITAGS |
| | and petroleum hydrocarbons<br><br>**Groundwater:** chlorinated hydrocarbons, and arsenic | | | | | | | | | |

# Cleanup Site Details

**Cleanup Site ID: 6717**

**Cleanup Site ID:** 6717 **Facility/Site ID:** 82766892 **UST ID:** 7425 Site Page Site Documents View Map

**Cleanup Site Name:** EMERALD CITY DISPOSAL MASSACHUSETTS Glossary

**Alternate Names:** EMERALD CITY DISPOSAL, EMERALD CITY DISPOSAL MASSACHUSETTS, Sea Bay Transportation Inc, USCG ISC SEATTLE

## LOCATION

**Address:** 9 S MASSACHUSETTS **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58881 **Longitude:** -122.34052 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** Cleanup Started **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** Yes

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| US COAST GUARD PIER 35/EMERALD CITY DISPOSAL | Upland | Cleanup Started | NW | Northwest Region | Independent Action |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Halogenated Organics | B | | C | | | |
| Petroleum Products-Unspecified | | | B | | | |
| Petroleum-Gasoline | C | | | | | |

**Key:**
B - Below Cleanup Level
S - Suspected
C - Confirmed Above Cleanup Level
R - Remediated
RA - Remediated-Above
RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 10/7/1998 |
| LUST - Report Received | Completed | | 10/7/1998 |
| VCP Opinion on Remedial Investigation Work Plan | Canceled | 11/9/2004 | |
| LUST - Report Received | Completed | | 6/9/2006 |

# Cleanup Site Details

**Cleanup Site ID: 6842**

**Cleanup Site ID:** 6842 **Facility/Site ID:** 91231465 **UST ID:** 10036 Site Page Site Documents View Map

**Cleanup Site Name:** Federal Warehouse Glossary

**Alternate Names:** FEDERAL WAREHOUSE, US DOJ DEA Seattle Alaskan Way S, US GSA Alaskan Way, US GSA FEDERAL WAREHOUSE

## LOCATION

**Address:** 1555 ALASKAN WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58947 **Longitude:** -122.33771 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** Cleanup Started **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** Yes

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| US GSA FEDERAL WAREHOUSE | Upland | Cleanup Started | NW | Northwest Region | Independent Action |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Benzene | C | C | | | | |
| Metals - Other | | S | | | | |
| Non-Halogenated Pesticides | | S | | | | |
| Non-Halogenated Solvents | S | S | | | | |
| Petroleum-Diesel | C | C | | | | |
| Petroleum-Gasoline | C | C | | | | |
| Petroleum-Other | C | C | | | | |
| Polychlorinated biPhenyls (PCB) | | S | | | | |
| Polycyclic Aromatic Hydrocarbons | C | S | | | | |

**Key:**
B - Below Cleanup Level C - Confirmed Above Cleanup Level RA - Remediated-Above
S - Suspected R - Remediated RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 5/12/1998 |
| LUST - Report Received | Completed | | 5/12/1998 |

**SITE ACTIVITIES**

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| Site Discovery/Release Report Received | Completed | | 5/12/1998 |
| LUST - Report Received | Completed | | 2/11/2000 |
| VCP Opinion on Cleanup Action | Completed | 2/11/2000 | 4/30/2001 |

# Cleanup Site Details

**Cleanup Site ID: 10181**

**Cleanup Site ID:** 10181 **Facility/Site ID:** 68879649 **UST ID:** 9713 Site Page Site Documents View Map

**Cleanup Site Name:** US COAST GUARD PIER 35 Glossary

**Alternate Names:** US CG Integrated Support Command Seattle, US COAST GUARD PIER 35 , US COAST GUARD SUPPORT FAC PIER 36 , US DOT CG Cutter Boutwell Whec, USCG SUPPORT CENTER SEATTLE

## LOCATION

**Address:** 1519 ALASKAN WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58999 **Longitude:** -122.33753 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** Cleanup Started **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Headquarters **Responsible Unit:** Headquarters **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| US COAST GUARD PIER 35 | Upland | Cleanup Started | HQ | Headquarters | Independent Action |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Petroleum-Other | C | | | | | |

**Key:**
B - Below Cleanup Level C - Confirmed Above Cleanup Level RA - Remediated-Above
S - Suspected R - Remediated RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 10/9/1990 |

# Cleanup Site Details

**Cleanup Site ID: 7005**

**Cleanup Site ID:** 7005 **Facility/Site ID:** 99728255 **UST ID:** 6269 Site Page Site Documents View Map

**Cleanup Site Name:** Port of Seattle Terminal 46 Glossary

**Alternate Names:** Port of Seattle Terminal 46, Seattle Port Terminal 46, TERMINAL 46

## LOCATION

**Address:** 401 ALASKAN WAY S TERMINAL 46 **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.59904 **Longitude:** -122.33707 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 6

## DETAIL

**Status:** Cleanup Started **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| PORT OF SEATTLE TERMINAL 46 | Upland | Cleanup Started | NW | Northwest Region | Independent Action |
| TERMINAL 46 | Sediment | Awaiting Cleanup | NW | Yang, Grant | No Process |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Benzene | B | B | | | | |
| Metals Priority Pollutants | | | | S | | |
| Petroleum-Diesel | C | B | | | | |
| Petroleum-Gasoline | C | B | | | | |
| Petroleum-Other | B | B | | | | |
| Phenolic Compounds | | | | S | | |

**Key:**
B - Below Cleanup Level
S - Suspected
C - Confirmed Above Cleanup Level
R - Remediated
RA - Remediated-Above
RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 4/24/1990 |
| Site Discovery/Release Report Received | Completed | | 4/24/1990 |
| LUST - Report Received | Completed | | 8/13/1990 |
| LUST - Report Received | Completed | | 12/17/1991 |

# Cleanup Site Details

**Cleanup Site ID: 7005**

**SITE ACTIVITIES**

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Report Received | Completed | | 7/28/1992 |
| LUST - Report Received | Completed | | 2/12/2003 |
| Initial Investigation / Federal Preliminary Assessment | Completed | | 8/8/2011 |
| Early Notice Letter(s) | Completed | | 3/4/2013 |

# Cleanup Site Details

**Cleanup Site ID: 2543**

**Cleanup Site ID:** 2543 **Facility/Site ID:** 2523 **UST ID:** N/A Site Page Site Documents View Map

**Cleanup Site Name:** GATX Tank Storage Terminal Glossary

**Alternate Names:** GATX Facility, GATX Tank Storage Terminal, GATX TANK STORAGE TERMINALS, GATX TERMINALS CORP, TOSCO GATX Seattle Term Tank S

## LOCATION

**Address:** 1733 ALASKAN WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58777 **Longitude:** -122.33921 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** Cleanup Complete-Active O&M/Monitoring **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| GATX Facility | Sediment | Awaiting Cleanup | NW | Yang, Grant | Independent Action |
| GATX Tank Storage Terminal | Upland | Cleanup Started | NW | Northwest Region | Ecology-supervised or conducted |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Metals Priority Pollutants | C | C | | S | | |
| Non-Halogenated Solvents | C | C | | S | | |
| Petroleum Products-Unspecified | C | C | | S | | |
| Polycyclic Aromatic Hydrocarbons | C | C | | S | | |

**Key:**
B - Below Cleanup Level C - Confirmed Above Cleanup Level RA - Remediated-Above
S - Suspected R - Remediated RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| Site Discovery/Release Report Received | Completed | | 12/1/1989 |
| Initial Investigation / Federal Preliminary Assessment | Completed | | 1/25/1995 |
| Early Notice Letter(s) | Completed | | 2/7/1995 |

# Cleanup Site Details

**Cleanup Site ID: 4394**

**Cleanup Site ID:** 4394 **Facility/Site ID:** 2055 **UST ID:** 6267 Site Page Site Documents View Map

**Cleanup Site Name:** Port of Seattle Terminal 30 Glossary

**Alternate Names:** CHEVRON USA SEATTLE PLANT, PORT OF SEATTLE TERM 30, Port of Seattle Terminal 30, Port of Seattle Terminal 30 Gas & Diesel USTs, Port of Seattle Terminal 30 Heating Oil Tank, TERMINAL 30, TERMINALS 30 AND 91 CRUISE TERMINAL RELOCATION

## LOCATION

**Address:** 2715 E MARGINAL WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.57948 **Longitude:** -122.34019 **WRIA:** 9 **Legislative District:** 11 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** Cleanup Started **NFA Received?** No **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** N/A **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** N/A **Brownfield?** No

**Site Manager:** Becker, Sunny **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| PORT OF SEATTLE TERM 30 | Sediment | Cleanup Started | NW | Yang, Grant | Ecology-supervised or conducted |
| Port of Seattle Terminal 30 | Upland | Cleanup Started | NW | Becker, Sunny | Ecology-supervised or conducted |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Metals Priority Pollutants | | | | C | | |
| Petroleum Products-Unspecified | C | C | S | C | | |
| Polychlorinated biPhenyls (PCB) | | | | C | | |
| Polycyclic Aromatic Hydrocarbons | C | C | S | C | | |

**Key:**
B - Below Cleanup Level C - Confirmed Above Cleanup Level RA - Remediated-Above
S - Suspected R - Remediated RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| Remedial Investigation and/or Feasibility Study | Completed | 1/1/1993 | 12/15/2008 |
| Cleanup Action Plan | In Process | 10/20/2014 | |
| Order/Decree/Amendment | In Process | 3/30/2017 | |

# Cleanup Site Details

**Cleanup Site ID: 213**

**Cleanup Site ID:** 213 **Facility/Site ID:** 2145 **UST ID:** N/A Site Page Site Documents View Map

**Cleanup Site Name:** Marine Disposal Corp Glossary

**Alternate Names:** MARINE DISPOSAL CORP

## LOCATION

**Address:** PIER 35 **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58915 **Longitude:** -122.34262 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** No Further Action **NFA Received?** Yes **Is PSI site?** Yes

**Statute:** Pre-MTCA **NFA Date:** 9/13/1995 **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** Cleaned up under Prior Authority **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| Marine Disposal Corp | Upland | No Further Action Required | NW | Northwest Region | No Process |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Halogenated Organics | S | | | | | |

**Key:**
B - Below Cleanup Level
S - Suspected
C - Confirmed Above Cleanup Level
R - Remediated
RA - Remediated-Above
RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| Site Discovery/Release Report Received | Completed | | 3/1/1988 |
| Site Status Changed to NFA | Completed | | 9/13/1995 |

# Cleanup Site Details

**Cleanup Site ID: 10182**

**Cleanup Site ID:** 10182 **Facility/Site ID:** 68879649 **UST ID:** 9713 Site Page Site Documents View Map

**Cleanup Site Name:** US COAST GUARD SUPPORT FAC PIER 36 Glossary

**Alternate Names:** US CG Integrated Support Command Seattle, US COAST GUARD PIER 35 , US COAST GUARD SUPPORT FAC PIER 36 , US DOT CG Cutter Boutwell Whec, USCG SUPPORT CENTER SEATTLE

## LOCATION

**Address:** 1519 ALASKAN WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58999 **Longitude:** -122.33753 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** No Further Action **NFA Received?** Yes **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** 2/15/2013 **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** Initial Investigation **Brownfield?** No

**Site Manager:** Headquarters **Responsible Unit:** Headquarters **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| US COAST GUARD SUPPORT FAC PIER 36 | Upland | No Further Action Required | HQ | Headquarters | Independent Action |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Petroleum-Other | S | | | | | |

**Key:**
B - Below Cleanup Level C - Confirmed Above Cleanup Level RA - Remediated-Above
S - Suspected R - Remediated RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 5/5/1992 |
| LUST - Report Received | Completed | | 6/19/1992 |
| Non-LUST Ind Report Received | Completed | | 3/11/1996 |
| Site Status Changed to NFA | Completed | | 2/15/2013 |
| LUST - NFA Determination II or SHA | Completed | | 2/15/2013 |

# Cleanup Site Details

**Cleanup Site ID: 10154**

**Cleanup Site ID:** 10154 **Facility/Site ID:** 68317828 **UST ID:** 530550 Site Page Site Documents View Map

**Cleanup Site Name:** FLINT INK BUILDING Glossary

**Alternate Names:** Cal Ink Division Flint Ink Cor, FLINT INC CORP, FLINT INK BLDG, FLINT INK BUILDING, FLINT INK CORP ALASKAN WAY

## LOCATION

**Address:** 1727 ALASKAN WAY S **City:** SEATTLE **Zip Code:** 98134 **County:** King

**Latitude:** 47.58747 **Longitude:** -122.33942 **WRIA:** 9 **Legislative District:** 37 **Congressional District:** 7 **TRS:** 24N 4E 7

## DETAIL

**Status:** No Further Action **NFA Received?** Yes **Is PSI site?** Yes

**Statute:** MTCA **NFA Date:** 10/3/2011 **Current VCP?** No **Past VCP?** No

**Site Rank:** N/A **NFA Reason:** Initial Investigation **Brownfield?** No

**Site Manager:** Northwest Region **Responsible Unit:** Northwest **Active Institutional Control?** No

## CLEANUP UNITS

| Cleanup Unit Name | Unit Type | Unit Status | Resp Unit | Unit Manager | Current Process |
|---|---|---|---|---|---|
| FLINT INK BUILDING | Upland | No Further Action Required | NW | Northwest Region | Independent Action |

## ACTIVE INSTITUTIONAL CONTROLS

| Instrument Type | Restriction Media | Restrictions/Requirements | Date | Recording Number | Recording County | Tax Parcel |
|---|---|---|---|---|---|---|
| There are no current Institutional Controls in effect for this site. | | | | | | |

## AFFECTED MEDIA & CONTAMINANTS

| | MEDIA | | | | | |
|---|---|---|---|---|---|---|
| **Contaminant** | **Soil** | **Groundwater** | **Surface Water** | **Sediment** | **Air** | **Bedrock** |
| Benzene | S | | | | | |
| Petroleum-Gasoline | S | | | | | |
| Petroleum-Other | RB | C | | | | |

**Key:**
B - Below Cleanup Level
S - Suspected
C - Confirmed Above Cleanup Level
R - Remediated
RA - Remediated-Above
RB - Remediated-Below

## SITE ACTIVITIES

| Activity | Status | Start Date | End Date/ Completion Date |
|---|---|---|---|
| LUST - Notification | Completed | | 3/1/2000 |
| Site Discovery/Release Report Received | Completed | | 3/1/2000 |
| LUST - Report Received | Completed | | 3/20/2000 |
| Initial Investigation / Federal Preliminary Assessment | Completed | | 8/8/2011 |
| Site Status Changed to NFA | Completed | | 10/3/2011 |