



December 16, 2022

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

Re: Notice of Availability for Draft Programmatic Environmental Impact Statement  
Request for Comments on Expansion and Modernization of Base Seattle  
Docket USCG-2021-0183

Dear Mr. Amundson,

On behalf of the Port of Seattle (Port) and The Northwest Seaport Alliance (NWSA), thank you for the opportunity to review and comment on the U.S. Coast Guard's (Coast Guard) Draft Programmatic Environmental Impact Statement (PEIS) for the Expansion and Modernization of Base Seattle.

The Coast Guard is an essential partner to the Port and the NWSA. Its operations and personnel have also long supported many maritime industries in the Seattle harbor. We recognize and acknowledge its key role in advancing national security, safety, environmental protection, and scientific research, the importance of which is underscored by the growing strategic importance of the United States' presence in the Arctic.

We also recognize, as we stated during scoping, that the project's alternatives have the potential to affect critical Port-owned and NWSA-managed facilities – specifically Terminal 46, Terminal 30, Pier 34, and Jack Perry Memorial Park. As we stated in our previous comments, the potential project alternatives for the Base Seattle expansion and modernization plans must be analyzed and evaluated in relation to existing and potential future marine cargo infrastructure and operations.

To that end, we believe strongly that the Coast Guard needs to conduct further analysis of alternatives before a fully informed decision can be made that strategically balances the needs of the Coast Guard with the essential work of Seattle harbor cargo operations and the quality jobs it creates.

The detailed comments attached to this memo, summarized below, identify shortcomings of the analysis on the proposed alternatives in the Draft PEIS. They also identify additional alternatives that should be considered – particularly related to restricting on-terminal development to only those uses that are truly water-dependent and options that minimize impact on cargo movement and throughput.

Before a final alternative is selected, additional planning should be undertaken, and the Coast Guard should engage in additional dialogue with affected stakeholders, including with the Port,

NWSA, and affected agencies. Likewise, we trust that the Coast Guard will undertake meaningful consultation with the Muckleshoot Indian Tribe and Suquamish Tribe to ensure that impacts to their Usual and Accustomed fishing areas and treaty-reserved fish and shellfish resources are adequately mitigated. The importance of treaty rights and the well-being of our tribal partners cannot be overstated.

The aforementioned planning and dialogue will result in a more detailed and comprehensive evaluation of the proposed base expansion to minimize potential negative effects on limited waterfront property. While we recognize the Coast Guard's desire to have a timely decision made regarding siting certain support services nearby Base Seattle, we believe this additional work can be conducted with minimal impact on the decision-making process and timeline.

In addition, in early February the Port and NWSA will solidify our own position on potential acquisition of Port property by the Coast Guard and on which base expansion alternative(s) we can support. We would like to discuss these items with the Coast Guard at that time.

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

Attached:

Summary of Technical Comments

Detailed Technical Comments Draft PEIS Comments Docket USCG-2021-0183

## SUMMARY OF TECHNICAL COMMENTS

### **Purpose and Need**

The Port of Seattle (Port) and The Northwest Seaport Alliance (NWSA) recognize the need for the Coast Guard to provide adequate and efficient facilities and infrastructure to serve Coast Guard Base Seattle. However, project alternatives included in the Draft PEIS do not sufficiently analyze and evaluate Base Seattle expansion and modernization needs. The need for consolidation of existing Seattle support services to be immediately adjacent to the Coast Guard Base Seattle remains unclear. The need to consolidate nearby Coast Guard operations, such as currently leased Seattle housing, is not identified or explained. In addition, the need to increase on-site single occupancy vehicle parking from 50 percent to 93 percent versus utilizing multimodal transportation options also is not explained. The Port and the NWSA request the Coast Guard clarify base needs that inform the current range of alternatives.

### **Scope of Alternatives**

The Port and the NWSA submit that the scope of project alternatives is too narrowly defined, including restricting analysis and evaluations to area contiguous with existing facilities. In particular, the need for consolidation of existing Seattle support services to be within the perimeter of an expanded Coast Guard Base Seattle is not clearly described, nor is the need to consolidate nearby Coast Guard operations, such as currently leased Seattle housing. Locating non-water-dependent support facilities such as parking and temporary housing on nearby property off the waterfront but still close to the Coast Guard's Base Seattle would meet the Coast Guard's Purpose and Need.

In addition, the alternatives suggested below could reduce the inconsistency of the Coast Guard's proposal with the Coastal Zone Management Act (CZMA). As noted on page 14 of the Consistency Determination, USCG states "This determination of consistency... is based on review of applicable sections of the State of Washington SMA and policies and standards of the city of Seattle SMP." In addition to the Seattle Municipal Code, the City's SMP also includes policies such as:

- "LU270 Identify and designate appropriate land for water-dependent business and industrial uses as follows: 1. Cargo Handling Facilities: a. Reserve space in deep water areas with adequate vessel maneuvering areas to permit the Port of Seattle and other marine industries to remain competitive with other ports."
- "LU304 Allow uses that are not water-dependent to locate on waterfront lots in limited circumstances and in a limited square footage on a site as part of development that includes water-dependent or water-related uses, where it is demonstrated that the allowed uses will benefit water-dependent uses and where the use will not preclude future use by water-dependent uses."

Therefore, the Port and the NWSA propose the following alternatives be analyzed in the Final PEIS:

1. Alternatives that minimize Port waterfront property acquisition and impacts to operations.
  - a. Locate non-water-dependent uses (parking, administration, temporary housing) offsite.
  - b. Minimize space needs by building taller.
  - c. Minimize parking needs by utilizing alternative methods of transport (vanpool, transit, etc.), which is consistent with the Washington State Commute Trip Reduction Law, Shoreline Management Program, Coastal Zone Management Act, EO 14057, and 5 USC 7905.
  - d. Minimize impacts to terminal operations by reshaping the alternative boundaries.
2. Treatment of the current subalternatives as separate alternatives since they have significantly different impacts on waterfront lands.
  - a. Of particular concern is the treatment and need for the Building 7 relocation. Each alternative includes sub-alternatives that would require significant additional acreage if Building 7 needs to be rebuilt. Yet the Coast Guard does not explain why Building 7 could not be rebuilt in the same place in the same footprint, nor is there any discussion to minimize the impacts of these different scenarios.
3. The creation of comparable alternatives.
  - a. Alternatives 2 and 3 without the acquisition of the MITAGS facility.
  - b. Alternative 1 with the acquisition of the MITAGS facility.

The Port and the NWSA also would like clarification on the No-Action Alternative. As part of the No-Action Alternative, the base will receive three new Polar Security Cutters. However, no infrastructure improvements are mentioned to receive these new vessels. Please clarify why infrastructure upgrades are not considered to receive these new vessels under the No-Action Alternative, but infrastructure upgrades are considered necessary to receive additional cutters under the Action Alternatives. Also, the Port hopes that the Coast Guard would not defer necessary maintenance and upgrades to the existing facilities absent the Base Seattle expansion. Please clarify the No-Action Alternative to include reasonably foreseeable (1) future projects; and (2) maintenance and repair actions.

### **Definition of Alternatives**

The Port and the NWSA were unclear as to the work necessary to complete each alternative. It also appears that potential design and analysis of Alternatives 2 and 3 was deferred due to a lack of information. The result is that the quality of the analysis devoted to the various alternatives is inconsistent across PEIS chapters and makes it difficult to evaluate and compare environmental impacts between alternatives and potential impacts to Port/Alliance operations. For clarity, we would like the Coast Guard to provide the following in the Final PEIS:

1. Detailed figures showing potential layouts for each alternative, including buildings, laydown areas, principal access points and internal circulation plans, parking, open storage, etc.
2. Detailed descriptions for construction activities and completed project operations for all proposed alternatives.
3. Detailed description of all proposed/anticipated inwater/overwater structure removal and installation, including potential aquatic area effects (shading and seabed).

It is essential that information presented in the PEIS demonstrates that that all alternatives are comprehensively analyzed and evaluated with an equal amount of detail.

### **Assumptions and Analyses**

Several PEIS sections include incorrect assumptions and descriptions of Port and NWSA operations and holdings. We look forward to working closely with the Coast Guard to correct these assumptions, and we will happily supply accurate data for use in analysis and evaluations presented in the Final PEIS. Below is a general list of the descriptions that require revision (as is described more specifically in the attached technical comments):

1. The PEIS presents impacts to Jack Perry Park resulting in the loss of public access. However, if Jack Perry Park is taken by the Coast Guard, the Port and the NWSA are obligated to replace the existing Jack Perry Park public shoreline access area, and our intention is to replace it with a park that improves waterfront access and provides better amenities to the public and wildlife.
2. Terminal 46 is not listed as a container Terminal in the PEIS. The Terminal is currently permitted for container use and is being used as a container yard to support cargo operations at other marine terminals. Container ships are expected to resume calling at the terminal in early 2023. It should, therefore, be analyzed under its currently permitted use.
3. The description of existing Port/NWSA container terminals is inaccurate.
4. The analysis of container volume, revenue, and job and traffic impacts is incorrect and uses a one-size-fits-all per acre approach that does not account for terminal operational realities and needs.
5. The description of cleanup actions is inaccurate.
6. The description of current stormwater utility and Port/NWSA projects is inaccurate/incomplete.
7. There is no description of impacts due to the loss of the Pier 34 moorage dolphins, which are critical (and scarce) assets for barge commerce serving the maritime industry in the region.
8. The Draft PEIS makes assumptions based on single-occupancy vehicle transportation and parking needs that are incompatible with regional and state policies for transit-oriented development and commute trip reduction (i.e., Washington's Commute Trip Reduction Act).

There are also numerous resource area descriptions that require additional analysis and supporting information to ensure an adequate analysis of potential negative area-wide environmental effects. The deficiencies observed include the following:

1. The transportation analysis should analyze:
  - a. the impact of the proposed secondary gate/access control point to on terminal operations and the adjacent road intersections; and
  - b. peak hours and the impacts of the proposed increase in personnel and personal vehicle travel on already heavily congested intersections near the base.
2. The air quality/greenhouse gas analyses should address transportation impacts of the increase in base traffic and related congestion.
3. Impacts to the shoreline and analysis of removal and replacement of overwater coverage is not described in detail.
4. There is no discussion of the Container Port Element policy (Shoreline Management Program) as part of the CZMA Consistency determination or how base operations will be consistent with the CZMA (traffic, parking, etc.). Any inconsistencies (traffic, parking, temporary housing, etc.) should be disclosed and addressed.
5. The analyses refer to moving displaced Port operations, but do not sufficiently consider the feasibility or impact of that task in an area of limited shoreline and deep harbor access.
6. Electrical capacity assumptions may be inaccurate, and the analysis of potential impacts to the electrical grid is lacking.
7. The project list in the cumulative impacts section does not include several key area projects.