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FINAL Environmental Assessment for the USCG Station Tybee Station Rebuild Project
Cockspur Island, Chatham County, Georgia

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USCG STATION TYBEE REBUILD PROJECT ON COCKSPUR ISLAND GEORGIA FINAL ENVIRONMENTAL ASSESSMENT

The Final Environmental Assessment (EA) for the USCG Station Tybee Project has been prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) (42 U.S. Code [USC]); Council on Environmental Quality (CEQ) *Regulations for Implementing NEPA* (40 Code of Federal Regulations [CFR] Parts 1500-1508); Department of Homeland Security Management Directive 023-01; and Coast Guard Commandant Instruction (COMDTINST) 5090.1, *U.S. Coast Guard Environmental Planning Policy and Environmental Planning Implementing Procedures* (April 2019).

This Final EA serves as a concise public document to briefly provide sufficient evidence and analysis for determining the need to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). This Final EA concisely describes the Proposed Action, the need for the Proposed Action, alternatives, and the environmental impacts of the Proposed Action and alternatives. This Final EA also contains a comparative analysis of the action and alternatives, a statement of the environmental significance of the preferred alternative, and a list of the agencies and persons consulted during the Final EA preparation.

HYLTON.RICHARD.D.JR.1229466069 Digitally signed by HYLTON.RICHARD.D.JR.1229466069 Date: 2021.04.15 11:06:30 -04'00'	Environmental Engineer	Level II
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I reviewed the Final EA and submitted my comments to the Proponent.

Digitally signed by AMUNDSON.DEAN.JAY.1274011862 Date: 2021.04.15 16:41:58 -07'00'	Environmental Protection Specialist	Level III
Dean Amundson Environmental Reviewer & Senior Environmental Professional	Title/Position	NEPA Warrant Program

In reaching my decision/ recommendation for the USCG's Proposed Action, I considered the information contained in this Final EA and considered the written comments submitted to me from the Environmental Reviewer(s).

Digitally signed by BARRESI.JOHN.F.JRII.1187016629 Date: 2021.04.19 14:31:18 -04'00'	Commanding Officer - Facilities Design and Construction Center
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United States Coast Guard Finding of No Significant Impact (FONSI) for Station Tybee, GA Rebuild Project

The U.S. Coast Guard (USCG) proposes to rebuild Station Tybee and associated infrastructure that was further damaged by Hurricane Matthew in 2016. The Preferred Alternative is Alternative 2, as described in the Final Environmental Assessment (EA). The overarching need for the Proposed Action is to provide Station Tybee with facilities and infrastructure that will allow them to adequately execute their mission requirements.

Summary of the results of the environmental impact evaluation: The Final EA prepared for this proposal presents the purpose and need for the action, the Proposed Action and its alternatives, a description of the affected environment, and an analysis of direct and indirect environmental consequences. Based on the findings of the Final EA, the USCG concluded no significant impacts would result from implementing the Proposed Action (Preferred Alternative - Alternative 2) or any of the other alternatives evaluated in the Final EA.

Mitigation commitments that will be implemented to reduce otherwise significant impacts: The USCG will comply with all regulatory requirements, mitigation measures and best management practices (BMPs) as described in the Final EA to eliminate or reduce adverse impacts, ensuring that no significant adverse impacts will occur. In response to consultation initiated by the USCG, a Memorandum of Agreement with the Georgia Historic Preservation Officer and the National Park Service (NPS) has been signed in order to mitigate minor adverse effects on Cockspur Island, which is a historic property owned by the NPS. This agreement is included as an Appendix in the Final EA document. Additionally, once a final design is established the USCG will consult further with the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) Protected Resources Division, NOAA NMFS Habitat Conservation Division,and will commit to comply with any additional mitigation measures deemed necessary to ensure the impacts of the Proposed Action in-water work are not significant. The USCG will not perform any in-water work until all required consultation is complete.

This FONSI is based on the attached contractor-prepared Final EA that has been independently evaluated by the USCG and determined to adequately and accurately discuss the environmental issues and impacts of the Proposed Action and its alternatives, and provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. USCG takes full responsibility for the accuracy, scope, and content of the attached contractor-prepared Final EA.

I reviewed the Final EA, which is the basis for this FONSI, and submitted my comments to the Proponent.

Digitally signed by AMUNDSON.DEAN.JAY.1274011862 Date: 2021.04.15 16:43:02 -07'00'	Environmental Potection Specialist	Level III
Dean Amundson Environmental Reviewer & Senior Environmental Professional	Title/Position	NEPA Warrant Program

In reaching my decision/ recommendation for USCG's Proposed Action, I considered the information contained in this Final EA/FONSI and considered the written comments submitted to me from the Environmental Reviewer(s). Based on the information in the Final EA and this FONSI document, I agree that the Proposed Action as described above, and in the Final EA, will have no significant impact on the environment.

Digitally signed by BARRESI.JOHN.F.JRII.1187016629 Date: 2021.04.19 14:31:28 -04'00'	Commanding Officer - Facilities Design and Construction Center
Captain J. F. Barresi - Proponent	Title / Position

EXECUTIVE SUMMARY

ES.1 Introduction

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (Public Law 91-190, 42 United States Code [U.S.C.] §4321 et. seq.); the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§1500-1508); Department of Homeland Security (DHS) Management Directive 023-01-001-01 (series) Implementation of the National Environmental Policy Act; and United States Coast Guard (USCG) Commandant Instruction (COMDTINST) 5090.1 (series), U.S. Coast Guard Environmental Planning Policy; and the National Park Service (NPS) Director's Order 12, as the NPS is a cooperating agency on this EA because Station Tybee is located on the Fort Pulaski National Monument, which is managed by the NPS.

This EA evaluates the environmental impacts of the USCG's proposal to rebuild hurricane-damaged facilities at USCG Station Tybee (the Station; Proposed Action) and its alternatives. The information and analysis contained within this EA will determine whether implementation of the Proposed Action would have a significant impact on the environment, requiring preparation of an Environmental Impact Statement (EIS). If no significant impacts would occur, a Finding of No Significant Impact (FONSI) would be appropriate.

ES.2 Scope of the Environmental Assessment

This EA evaluates the potential environmental impacts of implementing the Proposed Action and reasonable alternatives. In accordance with NEPA and CEQ regulations, this EA considers two action alternatives – Rebuild Option 1 and Rebuild Option 2 (the Preferred Action Alternative) – for implementing the Proposed Action. The No Action Alternative is also evaluated as required by CEQ regulations, COMDTINST 5090.1, and NPS Director's Order 12. Full descriptions of the two rebuild alternatives and No Action Alternative are provided in Section 2.2.

ES.3 Background

The USCG and NPS have cooperatively prepared this EA to evaluate the potential environmental impacts from constructing a new Multi-Mission Station Facility (hereafter referred to as the Multi-Mission Building [MMB]), demolishing selected existing onshore facilities, and all associated site work including repair of the riprap along the shoreline of Station Tybee. Collectively, these activities constitute the Proposed Action evaluated in this EA. Construction of the MMB would replace multiple onshore buildings at Station Tybee that were substantially damaged during Hurricane Matthew in 2016, including the Station Building. The EA will also allow the NPS to determine if the improvements included in the Proposed Action are appropriate for Fort Pulaski National Monument (referred to as the Park Area) and consistent with the Park Area's General Management Plan and other applicable laws. Review and approval by the NPS of proposed improvements is subject to compliance with NEPA.

ES.4 Purpose and Need

The purpose of the Proposed Action is to accomplish the Station's various missions by rebuilding the Station to replace storm-damaged and aging facilities. Implementation of the Proposed Action would

equip the Station with modern facilities that comply with today's standards and harden its infrastructure for future resiliency.

The Proposed Action is needed to: (1) replace aging facilities that no longer meet Coast Guard needs; (2) repair damages to facilities, such as the rip-rap along the shoreline, incurred from Hurricane Matthew and prior storm events; and (3) provide resilient facilities to support mission execution, especially during future storm events. Addressing these elements will create a Station that fulfills the needs and requirements of the units that use it. Additionally, it will remedy the issues and constraints that the units have experienced as a result of aging and damaged facilities, while also hardening the Station's infrastructure for future resiliency.

ES.5 Proposed Action and Alternatives

The USCG's Proposed Action consists of the following primary components:

1) At the Station Tybee compound, construct and operate a new 26,000 gross square foot (GSF) MMB; repair the stone riprap along the Station shoreline; complete major site work to include reconfiguring parking areas and internal Station roads; and make major upgrades to utilities.
2) Demolish existing facilities at Station Tybee that do not meet USCG and resiliency requirements and remove temporary office trailers at the Station following completion of the proposed MMB.
3) Upgrade/replace the existing wastewater treatment system currently operated by the NPS in an area (Area A), located to the immediate southeast of the Station Tybee compound, with the USCG to complete the upgrade/replacement and then maintain the upgraded system under an Inter-Agency Agreement (IAA) with the NPS.
4) Upgrade the existing NPS boat ramp, including adding a floating dock, to accommodate USCG boats in an area (Area B) to the east of the Station Tybee compound, with the USCG to complete the improvements and use the boat ramp and NPS to have administrative use of the area per the IAA.
5) Upgrade the existing potable water supply groundwater well system, including constructing a new pump house in an area (Area C) to the far southeast of the Station Tybee compound, with the USCG making the improvements for shared use by the USCG and NPS, and the NPS maintaining all upgrades and improvements in the future per the IAA.

ES.5.1 Action Alternatives

Each of the two action alternatives, described below, would include waterfront and shore infrastructure upgrades and/or replacements.

Alternative 1: Rebuild Option 1

Alternative 1 would demolish Station Building 101 (15,857 GSF) and support buildings, including Buildings 102, 109, and other buildings (total 23,096 GSF), and replace them with an MMB designed and built to modern standards. Construction of a total of 26,000 GSF, which would account for replacing Building 101, adding boat storage, and replacing Buildings 102, 109, and the Aids to Navigation Team (ANT Tybee) Building 115, would satisfy the facility requirements for Station Tybee, ANT Tybee, and USCG Cutter (CGC) POMPANO functions combined. The USCG would improve the existing wastewater treatment system, if feasible, within the Station and realign parking and roads within the compound. Alternative 1 also includes major erosion repairs to the existing stone riprap along the shoreline of the

Savannah River at Station Tybee. A new boat ramp would be constructed within the Savanah River to the east of the existing Station pier.

The new MMB building, to replace Building 101 and other buildings, would be re-constructed to the west of the current location of Building 101, and the main entrance gate would be shifted to the west to provide space for circulation and parking for trailered boats and shop operations. This would also include some associated pavement expansion and utilities extension.

During the construction period (estimated at 18 to 24 months), temporary space would be provided in trailers on site and off site. With this alternative, Station Tybee would continue to use the existing land parcel; however, it would not use the NPS boat ramp or wastewater treatment system, which are beyond the Station compound boundaries and owned and operated by the NPS.

Alternative 2: Rebuild Option 2 (Preferred Alternative)

Alternative 2 (the Preferred Alternative) would demolish Station Building 101 (15,857 GSF) and support buildings, including Buildings 102, 109, 115, and other buildings (total 23,096 GSF), and replace them with an MMB designed and built to modern standards. Construction of a total of 26,000 GSF (replacing Building 101; adding boat storage; and replacing Buildings 102, 109, and ANT Tybee Building 115) would satisfy the facility requirements for Station Tybee, ANT Tybee, and CGC Pompano functions combined.

In contrast to Alternative 1, Alternative 2 would:

- Upgrade/replace the existing wastewater treatment system currently operated by the NPS in an area (Area A) located to the immediate southeast of the Station Tybee compound;
- Upgrade an existing NPS boat ramp to accommodate USCG boats in an area (Area B) to the east of Station Tybee; and
- Upgrade the existing potable water supply groundwater well system, including constructing a new pump house (Area C) and upgrading the existing gravel parking lot at the NPS picnic pavilion and the access drive thereto (Area C).

Under the terms of the IAA, the USCG will upgrade the wastewater treatment system and use and maintain it and will upgrade and use the NPS boat ramp. The USCG will complete the improvements to the existing water supply system in Area C, and the NPS will operate and maintain them.

ES.5.2 No Action Alternative

The No Action Alternative would retain existing facilities (buildings and piers) for indefinite continued use with only routine repair and maintenance provided. No additional space would be constructed, and no major building renovation/repair would be performed. Although Station Building 101 requires significant structural repairs to extend its useful life, the cost of major renovation/repair of the building would well exceed 50 percent of its Plant Replacement Value, and the USCG previously determined that it is not cost-effective to attempt major renovation of this building; therefore, the No Action Alternative is deemed non-viable, as it does not meet the Purpose and Need.

ES.6 Agency Consultations and Public Involvement

Pursuant to the requirements of NEPA (40 CFR 1506.6), this EA is subject to public involvement. Agencies, organizations, and members of the public with a potential interest in the Proposed Action were invited and encouraged to participate. The USCG published and distributed the Draft EA for a 30-day

public review and comment period, which was announced by a Notice of Availability (see Appendix A) published on January 6, 2021 in the Savannah Morning News and Savannah Tribune. No comments from the general public were received on the Draft EA during the 30-day review period, and substantive comments on the Draft EA were only received from the U.S. Fish and Wildlife Service (USFWS). Interagency and intergovernmental coordination is a federally mandated process for informing and coordinating with other governmental agencies regarding federal proposed actions. CEQ regulations require intergovernmental notifications before making any detailed statement of environmental impacts. A complete list of federal, state, and local agencies consulted for this EA is included in Section 7.0, and copies of relevant correspondence with those agencies are provided in **Appendices A and B**. Information and comments received from these agencies have been incorporated into this EA as appropriate. Native American tribes were also invited to participate in the NEPA and National Historic Preservation Act (NHPA) Section 106 processes in accordance with Executive Order (EO) 13175, Consultation and Coordination with Indian Tribal Governments. Copies of relevant correspondence to and from the Georgia State Historic Preservation Officer (GA SHPO) under Section 106 of the NHPA and tribal correspondence are provided in **Appendix B**.

A summary of the environmental impacts of each alternative is provided in **Table ES-1**. The analysis assumes that best management practices (BMPs) included as standard provisions of USCG contracts and developed during federal planning processes would be employed to avoid or minimize significant adverse impacts on the environment. Implementing BMPs would ensure that the Proposed Action would avoid significant impacts or reduce potential impacts to less-than-significant levels.

The USCG will strive to comply with all EA mitigation measures recommended to ensure impacts to cultural and natural resources are avoided or minimized and are not significant. If the USCG is unable to complete any recommended mitigation, or the regulatory findings are other than what have been anticipated and described in this EA, the USCG will supplement the findings of this EA. Additionally, the USCG will not begin any on-shore or in-water work until all regulatory consultation requirements are complete and all required environmental permits have been issued.

Table ES-1: Summary of Potential Impacts to Affected Environmental Resources

Environmental Resources				
	Sub-Category	**Alternative 1**	**Alternative 2 (Preferred Alternative)**	**No-Action Alternative**
Land Use		No Significant Impacts	No Significant Impacts	No Impact
Infrastructure & Utilities		Long term, less-than-significant adverse impact	Long-term, less-than-significant beneficial impact	Long-term, Significant Adverse Impact

Environmental Resources	Sub-Category	Alternative 1	Alternative 2 (Preferred Alternative)	No-Action Alternative
Socioeconomics		NEPA: Short-term, less-than-significant beneficial impact E.O. 12898: No disproportionate impacts	NEPA: Short-term, less-than significant beneficial impact E.O. 12898: No disproportionate impacts	NEPA: No Impact E.O. 12898: No Impact
Recreational Facilities		Short-term, less-than - significant adverse impact	Short-term, less than significant adverse impact	No Impact
Soils		Long-term, less-than-significant beneficial impact	Long-term, less-than-significant beneficial impact	Long-Term, significant adverse impact
Climate and Air Quality		Long -term, less-than-significant impact	Long-term, less-than-significant impact	No Impact
Noise		Short-term, less-than-significant adverse impact	Short-term, less-than significant adverse impact	No Impact
Hazardous Materials/Waste		No Impact	No Impact	No Impact
Biological Resources	Terrestrial Vegetation	No Impact	No Impact	No Impact
	Wildlife	No Impact	No Impact	No Impact
	Migratory Birds	NEPA: No Impact MBTA: No take	NEPA: No Impact MBTA: No take	NEPA: No Impact MBTA: No take
	Threatened and Endangered Species	NEPA: Short-term, less than significant adverse impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take	NEPA: Short-term, less-than-significant adverse impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take	NEPA: No Impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take

Environmental Resources	Sub-Category	Alternative 1	Alternative 2 (Preferred Alternative)	No-Action Alternative
	Essential Fish Habitat	No substantial adverse effect	No substantial adverse effect	No substantial adverse effect
Water Resources		NEPA: Long-term, less-than-significant adverse impact on Tidal Bottom: Long-term, less-than-significant impact on Water Quality: Long-term, less-than-significant impact on Floodplain CWA: No Impact E.O. 11988 Floodplain No Adverse Impact E.O. 11990 Wetlands: No Impact	NEPA: Long-term, less-than-significant adverse impact on Tidal Bottom: Long-term, less-than-significant impact on Water Quality: Long term, less-than-significant impact on Floodplain CWA: No Impact E.O. 11988 Floodplain No Adverse Impact E.O. 11990 Wetlands: No Impact	Long-term, less-than-significant impact on Water Quality CWA: No Impact E.O. 11988 Floodplain No Impact E.O. 11990 Wetlands: No Impact
Coastal Policies and Resources		CZMA: Consistent to the Maximum Extent Practicable	CZMA: Consistent to the Maximum Extent Practicable	CZMA: No Impacts
Cultural Resources		NEPA: Long-term, less-than-significant adverse impact NHPA: Adverse Effect	NEPA: Long-term, less-than-significant adverse impact NHPA: Adverse Effect	NEPA: No Impact NHPA: No Effect

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APPENDICES

Appendix A Agency Consultation and Public Involvement
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ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey
ANT	Aids to Navigation Team
AOR	area of responsibility
APE	area of potential effect
BA	biological assessment
BMP	best management practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CEU	Civil Engineering Unit
CFR	Code of Federal Regulations
CGC	Coast Guard Cutter
CMP	coastal management program
CO	carbon monoxide
COMDTINST	Commandant Instruction
CPS ASEC	Annual Social and Economic Supplement to the Current Population Survey
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DHS	Department of Homeland Security
DPS	Distinct Population Segment
E	endangered
EA	Environmental Assessment
EDDA	Environmental Due Diligence Audit
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EO	Executive Order
EP	Execution Proposal
EPD	Environmental Protection Division (GADNR)
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency

FOC	Full Operational Capacity
FONSI	Finding of No Significant Impact
Fort Pulaski	Fort Pulaski National Monument
GADNR	Georgia Department of Natural Resources
GHG	greenhouse gas
GPA	Georgia Port Authority
GSF	gross square feet
GSMM	Georgia Stormwater Management Manual
HAPC	Habitat Area of Particular Concern
IAA	Interagency Agreement
IRMA	Integrated Resource Management Applications
µg/m3	microgram per cubic meter
MBTA	Migratory Bird Treaty Act
MHW	mean high-water
MMB	Multi-Mission Building
MMPA	Marine Mammal Protection Act
MOA	Memorandum of Agreement
MSA	metropolitan service area
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
O3	ozone
OCGA	Official Code of Georgia
PAL	Personnel Allotment List

PEP	Population Estimates Program
PM_{10} and $PM_{2.5}$	particulate matter
PP	Planning Proposal
ppm	parts per million
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
SAR	search and rescue
SAV	submerged aquatic vegetation
SHPO	State Historic Preservation Officer
SIP	Stat Implementation Plan
SO2	sulfur dioxide
SOF	Statement of Findings
T	threatened
USACE	U.S. Army Corps of Engineers
U.S.C.	United States Code
USCG	U.S. Coast Guard
USDA	U.S. Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WPB	Coastal Patrol Boat
WOTUS	Waters of the U.S.

1 PURPOSE AND NEED FOR THE ACTION

1.1 Introduction

This Environmental Assessment (EA) evaluates the Proposed Action by the United States Coast Guard (USCG) and its alternatives to rebuild hurricane-damaged facilities by constructing a new Multi-Mission Station Facility (hereafter referred to as the Multi-Mission Building [MMB]) and demolishing existing onshore facilities. Also included in the USCG Proposed Action are repair of shoreline riprap, upgrade of existing water supply and wastewater treatment systems, and upgrade of the National Park Service (NPS) boat ramp (the Proposed Action). Construction of the MMB would replace aging facilities and multiple onshore buildings damaged during Hurricane Matthew in 2016 at Station Tybee (the Station), including the Station Building. Personnel and functions at Station Tybee would be located in the new MMB upon its completion.

NPS was invited by the USCG, in a letter dated September 17, 2020, to be a Cooperating Agency, and NPS agreed in a letter dated October 1, 2020 to be a Cooperating Agency. As a Cooperating Agency, the NPS assisted the USCG in developing the NEPA EA in order to ensure that pertinent NPS mission statements, legislative authorities, and policies were duly considered when developing any alternatives, related management actions, or options that could potentially affect the Fort Pulaski National Monument. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] §§ 4321 et seq.); the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508); Department of Homeland Security (DHS) Management Directive 023-01001-01 (series) I; Coast Guard Commandant Instruction (COMDTINST) 5090.1 (U.S. Coast Guard Environmental Planning Policy), and NPS Director's Order 12 for use by the USCG and NPS in making separate findings on the significance of the Proposed Action.

This EA has been completed to assist the USCG in making an informed decision on which alternative is appropriate for the rebuild of Station Tybee. The information and analysis contained within this EA will determine whether implementation of the Proposed Action would have a significant impact on the environment, requiring preparation of an Environmental Impact Statement (EIS). If no significant impacts would occur, a Finding of No Significant Impact (FONSI) would be appropriate. The EA will also allow the NPS to determine if the improvements included in the Proposed Action are appropriate for Fort Pulaski National Monument (referred to as the "Park Area") and consistent with the Park Area's General Management Plan and other applicable laws. Review and approval by the NPS of proposed improvements is subject to compliance with NEPA.

1.2 Background

1.2.1 United States Coast Guard Mission

The USCG employs approximately 38,000 active duty members and represents the seventh largest navy in the world. The USCG is a military service that is part of the DHS. In the past, however, upon a declaration of war or as directed by the U.S. Commander-in-Chief, the USCG has operated under the authority of the United States Navy and Department of Defense. USCG operations are divided into

Atlantic and Pacific commands, which are then subdivided into nine districts. Each district is further divided into sectors that are responsible for protecting inland waterways and coastal waters within the U.S. exclusive economic zone or any waters within 200 nautical miles of the shoreline.

The U.S. maritime domain includes more than 95,000 miles of coastline and, over time, the USCG mission has evolved to encompass a variety of maritime services related to national defense, law enforcement (e.g., natural resources and counter-narcotics operations), search and rescue (SAR), transportation, and waterways management, among others. In 2002, in response to the September 11, 2001 terrorist attacks, Congress approved the creation of the DHS. The DHS was designed to consolidate and coordinate domestic counterterrorism efforts, and the reorganization established the USCG as the lead agency for maritime homeland security.

The Station, assigned to Sector Charleston, USCG District 7, is located north of Tybee Island, Georgia, and east of downtown Savannah, Georgia. **Figure 1.1** depicts the Site Location Map for the Station. The Station occupies an approximate 3.1-acre parcel of land under an Interagency Agreement (IAA) with the NPS, Fort Pulaski National Monument (hereinafter referred to as “Fort Pulaski”) on Cockspur Island. **Figure 1.2** shows the Project Location Map for Station Tybee and Areas A, B, and C (the Action Area where the Proposed Action and alternatives would occur).

The Station historically responds to approximately 250 SAR cases per year. Station Tybee is also host to both Aids to Navigation Team (ANT) Tybee and USCG Cutter (CGC) POMPANO (WPB 87310), with different missions and areas of responsibility (AOR) as described in subsequent sections.

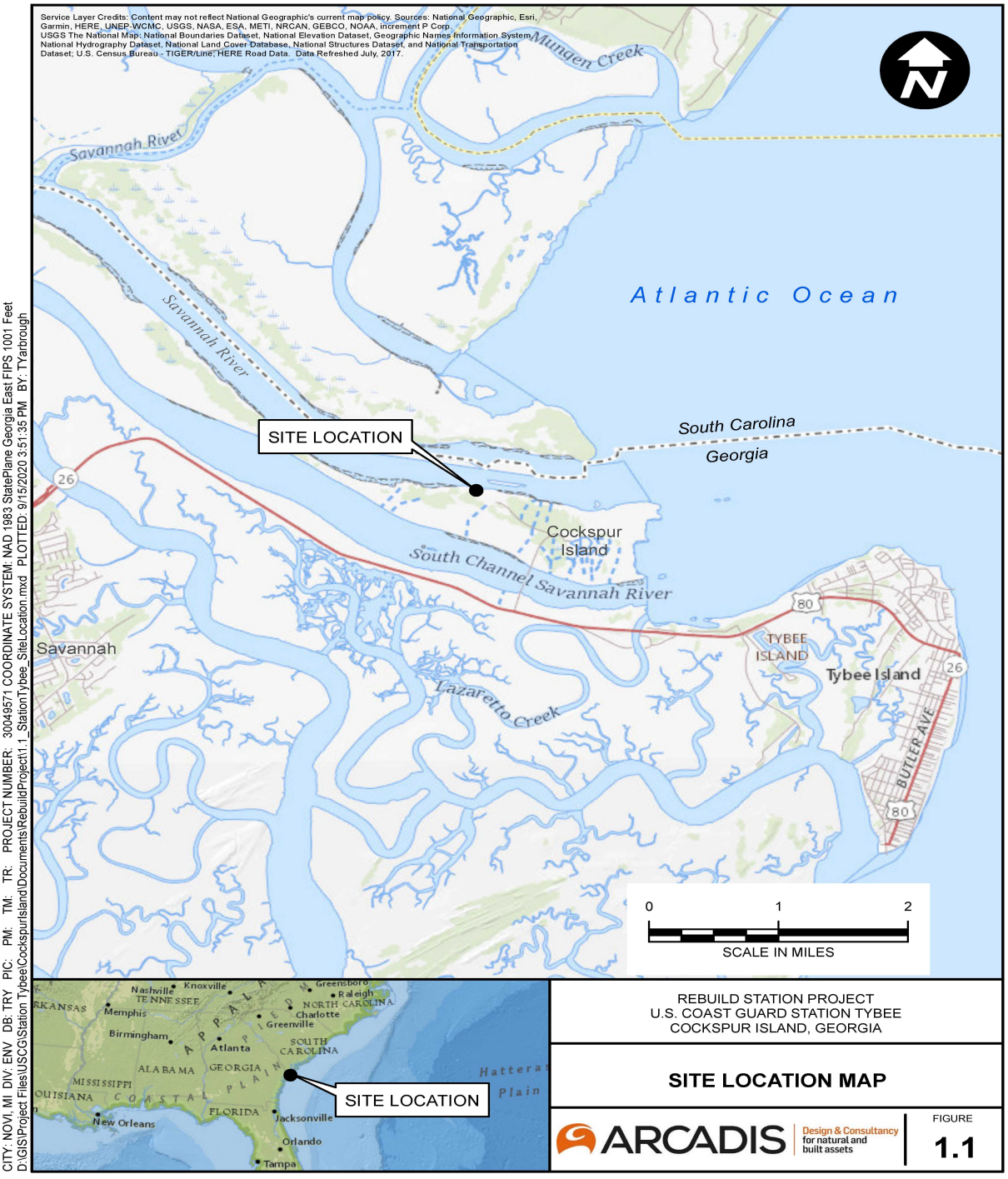

Figure 1.1: Site Location Map

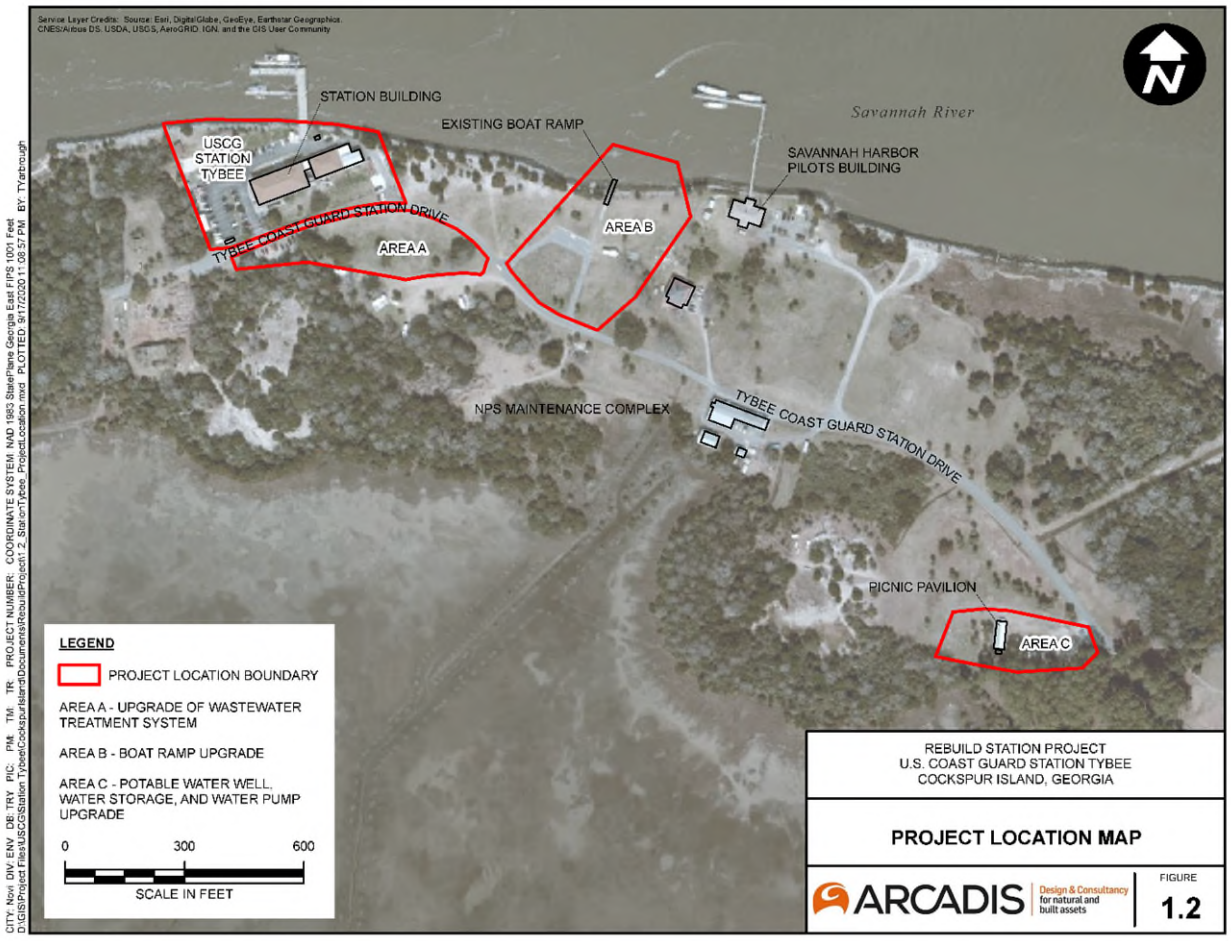

Figure 1.2: Project Location Map Station Tybee

The Station is located near the mouth of the Savannah River on Cockspur Island, Chatham County, Georgia. Cockspur Island is a small island located on the southern bank of the Savannah River, west of the City of Tybee Island. The majority of Cockspur Island is within NPS Fort Pulaski National Monument. Section 1.2.5 provides background information on Fort Pulaski. The onshore portion of Station Tybee exists on the approximate 3.1-acre parcel of land occupied and used by the USCG under an IAA between the NPS and the USCG, which was signed by both agencies in 1980 and then updated and signed by both agencies in March 2020. The IAA describes the stipulations regarding maintenance and improvements to the Station and other Fort Pulaski property. Those stipulations include the following with regard to improvements under the Proposed Action:

- To comply with current resiliency requirements as well as to minimize impact on the historical site, the USCG will construct a building with the smallest practical footprint. Building design and height are to be reviewed and approved in writing by the NPS.
- The USCG will use the area identified as Area A for the purpose of installing an improved wastewater treatment system. The USCG will allow NPS access and use of the wastewater treatment system.

The USCG will be responsible for all costs associated with the use/upgrade and maintenance of the wastewater treatment system.

- To improve the operational capacity of the USCG, the USCG will use Area B for the purpose of improving and utilizing the existing boat ramp.
- To improve the resiliency of the potable water system, the USCG will make a one-time upgrade to the NPS owned well and pump house. All upgrades to the potable well system will be for the shared use of the USCG and the NPS. The NPS will be responsible for maintaining all further upgrades and improvements to the potable well system.

The USCG AOR for the Station is an area covering approximately 75 coastal miles seaward from St. Helena Sound, South Carolina (32-27.5N 080-25.0W) to position 32-02N 079-54W; then southwesterly to position 31-18N 080-41W; then northwesterly to the southern tip of St. Catherine's Island (31-33N 081-11W). This includes miles of rivers, creeks, tributaries, and marshes. Station Tybee's specific responsibilities include, but are not limited to:

- Provide SAR and support in accordance with Seventh USCG District standard operation procedures and the SAR plan.
- Maintain a state of military readiness guarding U.S. shores for DHS.
- Provide resources for enforcement of federal laws and treaties and provide periodic support for other federal, state, and local agencies. Station Tybee will maintain a visible, aggressive Maritime Law Enforcement profile in its AOR.
- Support other USCG units as needed.
- Provide support for local community services and organizations and be an active member of the community.

The Station has one 45-foot Response Boat-Medium II and three 29-foot Response Boat-Small II. The Response Boat-Medium II is designed for multiple missions including SAR, law enforcement, drug and migrant interdiction, and port, waterway, and coastal security. The Response Boat-Small II is a multi-mission platform used for the full range of USCG missions including SAR, vessel boarding team deployment and law enforcement missions, port security, drug and migrant interdiction, and environmental response operations. (CGC POMPANO – a District 7 asset – is also stationed at Station Tybee, as discussed below.)

The existing waterfront infrastructure includes the main pier, access pier, north floating dock for CGC POMPANO, and south floating dock for small boats. The existing sizes of the waterfront facilities are sufficient for the operations at the Station. Water depths at the Station are sufficient to support operations.

1.2.2 ANT Tybee

ANT Tybee, located within the Station, is responsible for maintaining all federally owned buoys, day-boards, and other aids to navigation within its AOR. The ANT Tybee AOR extends along the full extent of coastal Georgia, the Savannah River, and eastern Georgia tributaries. ANT Tybee has one 25-foot trailer-able Aids to Navigation Boat homeported at Station Tybee.

1.2.3 CGC Pompano

CGC POMPANO (formerly TARPON) is an 87-foot Coastal Patrol Boat (WPB) homeported at Station Tybee. CGC POMPANO missions include SAR, Maritime Law Enforcement boarding of commercial and recreational vessels, and port security. CGC POMPANO is located within the Station. CGC POMPANO also is active in public affairs and hosts tours for local high schools and other organizations. CGC POMPANO's AOR extends from the South Carolina/Georgia border southward to Key West, Florida including all waters within the Sector Charleston AOR. CGC POMPANO also operates one small cutter boat (with trailer on site).

1.2.4 Existing Facilities

The Station, ANT Tybee, and CGC POMPANO currently operate out of a total of 23,936 gross square feet (GSF) of facility space including two primary buildings (101 and 109) and numerous smaller support facilities. **Table 1-1** details the existing Station Tybee facilities based on the current Shore Facilities Inventory. Station Building 101 houses the Station's offices, galley and mess deck, training and conference space, duty berthing rooms, and other personnel support space. Shop Building 109 houses Station Tybee shops, shop storage space, a fitness room, and other shop support spaces. It has a finished floor elevation of 15.94 feet (North American Vertical Datum of 1988) and a roof peak elevation of 46.14 feet, which is approximately 36 feet above ground level. Construction of the ANT Tybee boat maintenance and storage building (Building 115) was completed in 2009 to relieve some of the congestion.

Table 1-1: Existing Shore Infrastructure

Facility Number	Facility Name	Year Built	Area (GSF)
101	Station Building	1983	15,857
102	Flammable Storage Building	1996	102
103	Recreation Pavilion	1993	629
109	Shops Building	1983	3,852
110	Hurricane Shed	1990	288
113	Grounds Maintenance Shed	1990	171
115	ANT Tybee Storage Building #2	2009	1,725
116	ANT Tybee Storage Building #1	2009	320
117	CGC POMPANO Storage Building	2000	840
121	Paint Locker	-	84
RO1	Open Gen. Storage		68
		Total GSF	23,936

1.2.5 Fort Pulaski National Monument

Fort Pulaski National Monument is located west of Tybee Island, Georgia and consists of 5,623 acres of land on Cockspur and McQueen's islands (**Figure 1.3**). The Fort was constructed in the 19th century as part of a protective chain of forts built to protect the eastern seaboard cities from attack by the British, French, and Spanish. Fort Pulaski is a historic district listed on the National Register of Historic Places.

The park contains a range of significant historical and natural resources. Of the 5,623 acres of Fort Pulaski National Monument, nearly 5,000 acres are tidal salt marsh. Recreational visitation to the park has averaged approximately 339,000 individuals annually since 1995, with typical peak visitation between April and July (NPS 2013). The purposes of Fort Pulaski National Monument are to:

- Preserve and protect the 19th century masonry fort and its associated structures, and interpret its roles in coastal fortifications, military technology, and the Civil War.
- Preserve and protect other military structures, other governmental structures, and archeological resources associated with various military developments and fortifications on Cockspur Island.
- Preserve and protect approximately 5,000 acres of nearly pristine salt marsh on McQueen's and Cockspur Islands that constitute the largest portion of the national monument and interpret this important coastal ecology for the education, inspiration, and enjoyment of visitors.

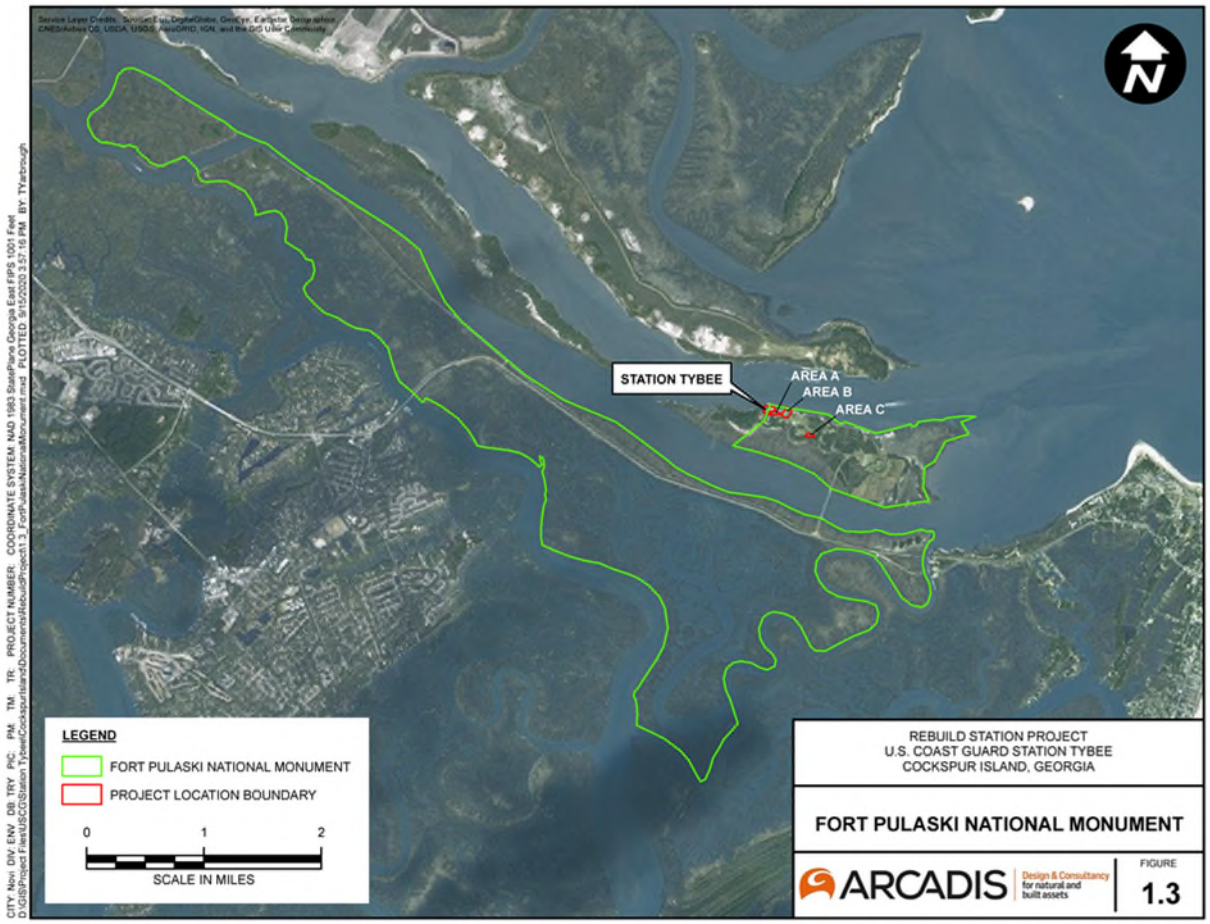

Figure 1.3: Fort Pulaski National Monument

1.3 Purpose of Proposed Action

The purpose of the Proposed Action is to accomplish the Station's various missions from its current location, which is centrally located within its AOR and provides sheltered but quick access to marine waters off the coasts of Georgia and South Carolina within its AOR, by rebuilding storm-damaged and aging facilities at the Station. Implementation of the Proposed Action would equip the Station with modern facilities that comply with today's standards and harden its infrastructure for future resiliency.

1.4 Need for Proposed Action

There are three distinct issues that are driving the need for the Proposed Action: (1) aging facilities that no longer meet USCG needs (2) damage to facilities from Hurricane Matthew and prior storm events and (3) the need to construct resilient facilities to support mission execution, especially during future storm events.

The Station is a multi-mission USCG Station, constructed in 1983, which has since added personnel and has seen deterioration in the facilities. In May 2008, District Seven outlined the operational constraints encountered by the unsatisfactory facilities. In 2019, a USCG proposal identified that the Station is currently operating at less than its full capability due to the current condition of the shore facilities and waterfront infrastructure. These structures have reached or exceeded their service life, which was exacerbated by storm damage and deterioration.

Hurricane Matthew made landfall on October 8, 2016 as a Category 1 hurricane just south of McClellanville, South Carolina, in the Cape Romain Wildlife Sanctuary. The storm produced upwards of 12 inches of rain along the coast and winds of up to approximately 88 miles per hour at landfall (NOAA et al. 2017). The combined impacts from high winds and rain resulted in damage to the second floor of the Station building, and storm surge resulted in damage to the rip-rap along the shoreline of the Station. Damaged waterfront riprap/structures allow scouring to produce sinkholes and subsidence to Station property, which has to be continually repaired. Recent Civil Engineering Unit (CEU) inspections (March 2019) have rated the structures as mostly in poor condition.

A quantitative analysis of what is required for basic facility operations versus existing assets is provided in **Table 1-2**. Comparing the total facility requirements to the existing facilities at Station Tybee, the Station has less than 70 percent of the building space required to effectively support the mission. The mission and personnel growth since the establishment of the Station has far exceeded the provision of facility space. Typical reasonable space utilization (existing compared to required) figures range from 0.95 (shortfall) to 1.15 (excess), and the capacities of all units at Station Tybee are below the reasonable space utilization range.

Table 1-2: Facility Requirements versus Existing Shore Infrastructure Summary

Existing USCG Unit	Required Infrastructure	Existing Infrastructure	Gap	Existing as Proportion Required
STA Station Tybee	20,283	15,857	4,426	0.782
ANT Tybee	5,802	2,045	3,757	0.352
CGC POMPANO	965	840	125	0.87
Total	**27,068**	**18,742**	**8,308**	**0.69**

Note: All units in square feet and gross floor area.

Station Building 101 (the largest building) presents the most serious problems with respect to long-term sustainability. It is in poor condition, especially regarding structural integrity. This building is a wood frame structure built on wood/steel trusses on a woodpile foundation, making it vulnerable to adverse impacts from local environmental conditions and natural events such as Hurricane Matthew. Much of the land mass along the north and west shores of Cockspur Island was built up with dredge spoil during the 1880s (Alexander 2008). Station Building 101 has experienced settling over the years, which has resulted in required installation of numerous jacks to counteract the settling. Additionally, because the air conditioning constantly runs during the summer, the system requires frequent servicing and mold removal. Station Tybee Building 101 also lacks a wet room and a space sufficient for all-hands gatherings.

As a result of poor living conditions in duty-berthing rooms, a rehabilitation project was executed in 2006. During project execution, numerous deficiencies were discovered including deteriorating floor trusses, sub-floors and floors, doors and frames, and exterior handrails and railings. The restroom facilities on the first deck were also found to be in disrepair, failing to meet Americans with Disabilities Act standards.

From an operational standpoint for the Station personnel/mission, covered small boat maintenance space is a space deficiency of high priority. Shop Building 109 is structurally sound but is poorly configured for daily operations. Work bays were originally designed as auto garages and do not provide sufficient overhead clearance for accommodating small boat maintenance.

The more recently completed ANT Tybee boat storage and maintenance building is sufficient to accommodate two boats, but shop space and storage space are not all collocated and are inadequately sized. Also, vehicular accessibility to the boat bay and maneuvering of boats on trailers is difficult due to existing physical constraints. Permanent storage and additional file storage space is needed.

Additionally, the shore facilities do not meet mission requirements as outlined above for the following reasons:

- The Station was originally constructed to accommodate 25 personnel; the current number of personnel assigned to the Station stands at approximately 55, which includes nearly 40 active-duty personnel assigned to the Station, an additional 11 to 12 assigned to CGC POMPANO, and six personnel assigned to ANT Tybee. The number of personnel assigned to Station Tybee could increase to 45 for active-duty personnel in the future if current plans are approved. This increase in personnel from the initial establishment of the Station has caused insufficient facilities and makeshift offices and shops to be constructed. Overcrowding has hindered mission readiness and the productivity of the units at the Station. There are also approximately 30 reservists assigned to the Station. The deficiencies were documented by the USCG in May 2008. In July 2008, the USCG approved the recapitalization or relocation of Station Tybee. Following Hurricane Matthew, the USCG developed in May 2019 a plan to rebuild facilities at the Station pursuant to the USCG Civil Engineering Manual (COMDTINST M11000.11B) and the Shore Facilities Standards Manual (COMDTINST M11012.9, Vol 1).
- When the Station was originally constructed, it was assigned three small boats. Now, the Station is assigned three 29-foot small boats plus one 45-foot medium boat in addition to ANT Tybee's 25-foot small boat and CGC POMPANO's 87-foot WPB and small boat. This has caused overcrowding for boat mooring and trailer parking. There is no boat ramp on site, and small boats must be transported to a boat ramp on Lazaretto Creek at Tybee Island. While this ramp is adequate in size and location

make this option difficult for launching/retrieving small boats without some adjacent floating dock to facilitate control of these vessels. Larger vessels, such as the 45-foot medium boat and CGC POMPANO, cannot be trailered and are dry docked at area shipyards when in need of out-of-water maintenance.

- The work bays and shops were originally designed for auto repair and do not have sufficient overhead space for boat maintenance. This causes all boat maintenance to occur outdoors. Working outdoors makes it difficult to conduct quality maintenance, as Cockspur Island is subject to excessive heat, rain, and insects.
- The Main Station Building (Building 101) is a wood frame structure built on wood/steel trusses on a woodpile foundation, which is not appropriate for the local environmental conditions. The building has deteriorated since the time of construction in 1983, and deficiencies continue. Additionally, the roof of the Station Building was damaged during Hurricane Matthew and resulted in the growth of mold, making the second floor uninhabitable and unusable. The trailers between the Station Building and the road are currently used as living quarters for the officers to replace currently unusable space on the second floor of the Station Building. There is a need to provide permanent living quarters and other required space.
- The current sanitary wastewater system is overtaxed by demand and requires approximately two times more septic system capacity to meet current demands (PHE-BAKER JV, LLC. 2020).

There is a need to construct resilient facilities to support mission execution, especially during future storm events. The Station is vulnerable to future hurricanes and high-water events, both due to its location within the floodplain and because of the material condition of the buildings. There is a need to make the Station resilient, which includes repairing the riprap along the Station shoreline that was damaged during Hurricane Matthew to reduce vulnerability to future hurricanes and to upgrade the water supply system, which provides potable water to the Station. The resiliency principles include, but are not limited to, mitigation measures against flooding, storm surge, or exposure as well as other appropriate safeguards to protect shore facilities, waterfront infrastructure, and critical systems – including distribution systems for supporting utilities (e.g., water/sewer/drainage, electricity, information technology).

1.5 Agency and Public Involvement Process

Pursuant to the requirements of NEPA (40 CFR 1506.6), this EA is subject to public involvement. Consideration of the views and information provided by all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, including minority, low-income, and disadvantaged groups, are encouraged to participate. A record of public involvement, agency coordination, and Native American consultation associated with this EA is provided in **Appendix A** and **Appendix B**. A complete list of agencies and individuals consulted during preparation of this EA is included in Section 7.0.

1.5.1 Agency Coordination/Consultation

Interagency and intergovernmental coordination is a federally mandated process for informing and coordinating with other governmental agencies regarding federal proposed actions. CEQ Regulations require intergovernmental notifications before making any detailed statement of environmental impacts.

This coordination also fulfills requirements under Executive Order (EO) 12372 (Intergovernmental Review of Federal Programs; superseded by EO 12416, and subsequently supplemented by EO 13132), which requires federal agencies to cooperate with and consider state and local views when implementing a federal proposal.

Project scoping letters were mailed to various federal, state, and local agencies and entities to solicit comments and feedback on the Proposed Action. Federal agencies consulted for this EA include: NPS Southeast Regional Office, U.S. Army Corps of Engineers (USACE), USFWS, United States Environmental Protection Agency (USEPA), U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), and NOAA National Marine Fisheries Service (NMFS). The USCG also consulted with the Seminole Tribe of Florida Tribal Historic Preservation Office (THPO). State and local entities consulted include the Georgia State Clearinghouse, Office of Planning and Budget; Georgia Department of Natural Resources (GADNR), Environmental Protection Division (EPD); GADNR, Historic Preservation Division; GADNR, Wildlife Resources Division; GADNR, Coastal Resources Division; Chatham County, Georgia; and the City of Tybee Island. This solicitation included a description of the Proposed Action, a regional location map, and a project location map.

The USCG, as the proponent of the Proposed Action, announced the availability of the Draft EA for a 30-day public review and comment period by publishing a Notice of Availability on January 6, 2021 in the Savannah Morning News and Savannah Tribune. The Notice of Availability published in these newspapers is included in Appendix A. The Draft EA was distributed to agencies which commented during scoping and was made available for public review at local repositories and online at https://www.dcms.uscg.mil/Our-Organization/Assistant-Commandant-for-Engineering-Logistics-CG-4-/Program-Offices/Environmental-Management/Environmental-Planning-and-Historic-Preservation/. The USCG received no comments from the public on the Draft EA and only substantive comments from the USFWS (see **Appendix A**). All substantive comments received from the USFWS during the 30-day Draft EA review period have been addressed in this Final EA.

Responses received during the public scoping and comment period and consultations by USCG with the USFWS and NMFS under Section 7 of the Endangered Species Act (ESA) and with the Georgia Historic Preservation Division (the State Historic Preservation Office) and THPOs under Section 106 of the NHPA are included in **Appendices A and B**.

2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This section describes the Proposed Action and the alternatives carried forward for analysis including the No Action Alternative. **Figure 2.1** depicts a site plan of the current layout of the Station.

2.1 Description of the Proposed Action

Under the Proposed Action, the USCG would rebuild and recapitalize the Station. The Proposed Action consists of the following primary components:

1. At Station, construct and operate a new, 26,000 GSF MMB, repair the stone riprap along the Station shoreline, complete major site work to include reconfiguring parking areas and internal Station roads, and make major upgrades to utilities.
2. Demolish the existing Station Building and other primary buildings (Flammable Storage Building, Shops Building, ANT Tybee Storage Building #2) at Station Tybee that are aging and/or damaged and do not meet USCG resiliency requirements and remove temporary office trailers at the Station following completion of the proposed MMB.
3. Upgrade/replace the existing wastewater treatment system operated by the NPS in an area (Area A) located immediately southeast of Station Tybee.
4. Upgrade the existing NPS boat ramp to accommodate USCG boats in an area (Area B) east of Station Tybee.
5. Upgrade the existing potable water supply groundwater well system, including constructing a new pump house in an area (Area C) southeast of Station Tybee.

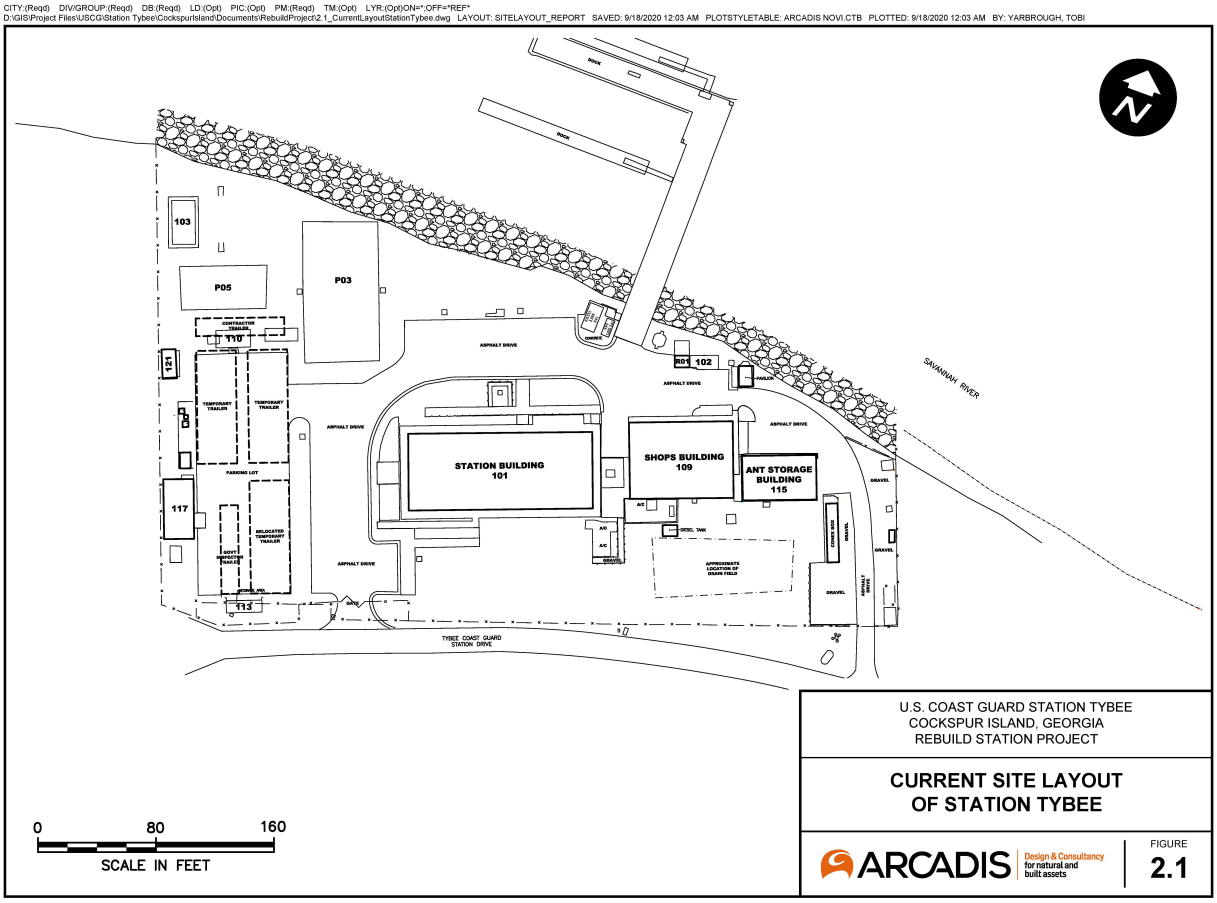

Figure 2.1: Current Site Layout of Station Tybee

2.2 Alternatives for Evaluation

2.2.1 Planning Process/Alternatives Development

The USCG determines facilities requirements for various actions (e.g., recapitalizations or homeporting) using the Shore Facilities Planning and Management System. Use of this system, in conjunction with master planning, identifies the need for capital facilities projects, including those associated with commissioning and homeporting new vessels, aircraft, or mission systems that support these assets. Once a need is identified, the USCG evaluates potential alternatives and ensures that various factors (e.g. cost, environmental impact, safety, etc.) are thoroughly considered. Alternatives analyzed in this EA were identified by the USCG as part of project planning. Other alternatives to the recapitalization of Station Tybee were identified in the USCG Station Tybee Recapitalize or Relocate Planning Proposal (Ecology & Environment 2010) but were eliminated from further analysis in this EA. They are discussed in Section 2.3.

The two alternatives identified by the USCG as viable and evaluated in this EA, along with the non-viable No Action Alternative, include:

- Rebuild Option 1: Rebuild On Site within Existing Station Boundaries
- Rebuild Option 2: Rebuild On Site with Use of NPS Upgraded Facilities
- Maintain Current Facilities (No Action Alternative).

During the planning phase for the Proposed Action, the USCG also evaluated several options specifically for upgrading the existing NPS wastewater treatment system within Area A. The evaluation was based on the combined wastewater production of Station Tybee, two buildings belonging to the NPS, a crewed WPB, and a set of five trailer pads located south of Station Tybee.

Options evaluated included (PHE-BAKER JV, LLC 2020):

1. Modification of the Existing System: would involve excavating and lining the trench bottoms of the existing absorption fields at Station Tybee and Area A with new material to bring the infiltration rates down to legally required levels.
2. Modification to a Mound System would involve supplementing or replacing entirely the existing mound within Area A with a Wisconsin Mound soil absorption system, as described in the DPH On-Site Sewage Management Systems Manual, Section F (5).
3. Modification to a Community System would involve combining and centralizing four separate septic fields within a 500+ acre area that includes Station Tybee to form a single, larger absorption field, to be located immediately south of the parking area near the NPS boat ramp, which would be capable of handling total tank demand across the entire area.
4. Alternative Treatment Systems composed of a packaged treatment system that could fit in an enclosure 8 feet wide and 20 feet long and would easily handle the daily treatment demands of the facilities as evaluated by the USCG and identified above.

Option 2, Modification to a Mound System, was recommended as the wastewater treatment system to be implemented. A comparison and rankings of each wastewater alternative are presented in **Table 2-1**.

Table 2-1 Ranking of Wastewater Treatment Alternatives and Current System

Option	Capital Cost	O&M Cost	Ease of Construction	Environmental Impact/ Regulations	Land Required	Solves Existing System Problems
Current System (Do Nothing)	1	3	1	4	1	4
1. Modify the Existing System	3	2	2	3	3	3

Option	Capital Cost	O&M Cost	Ease of Construction	Environmental Impact/ Regulations	Land Required	Solves Existing System Problems
2. Modification to a Mound System	2	1	3	2	2	1
3. Modification to a Community System	4	4	4	1	4	2
4. Alternative Treatment System	4	2	2	4	3 (without NPDES permit) 2 (with NPDES permit)	1

Systems were compared and ranked in each category on a scale of 1 to 4, with 1 being best and 4 being least desirable.
O&M = operation and maintenance

The following sections provide a description of the three alternatives. Each of the alternative actions described below, except for the No Action Alternative, would include waterfront and shore infrastructure upgrades and/or replacements.

2.2.2 Alternative 1: Rebuild Option 1

Alternative 1 includes demolishing existing buildings, including Building 101 (15,857 GSF), Building 102, Building 109, the ANT Tybee Building 115, and other ancillary buildings (a total of 23,096 GSF), and constructing a 26,000 GSF MMB to satisfy all the space needs for Station Tybee, ANT Tybee and CGC POMPANO. The new MMB would be an elevated three-story building, which would include a boat bay, which is a water-dependent structure, with high bays at the ground level and a mix of administrative and dormitory spaces on the second and third floors (PHE-BAKER JV, LLC 2020). The new Station Building will have a finished floor elevation of 16.2 feet, which is higher than the existing Station Building and 4 feet above the coastal high hazard area (VE zone) elevation of 12 feet.

The existing riprap shoreline at Station Tybee has been eroded and would be repaired by placing additional stone on both sides of the existing Station pier. A new boat ramp would be constructed adjacent to the existing USCG Station Tybee pier. During the construction period (estimated at 18 to 24 months), temporary space for personnel would be provided in leased trailers on site. With this alternative, no repair/upgrade to any of the existing NPS facilities in Areas A, B, and C would occur. The existing wastewater/septic treatment system at Station Tybee would need to be upgraded, if feasible. As noted previously in Section 1.4, the current system is overtaxed by demand and would require approximately two times more septic system capacity to meet current demands.

USCG facility planning advantages and disadvantages of this alternative are provided in **Table 2-2**.

Table 2-2: USCG Facility Planning Advantages and Disadvantages of Alternative 1

Advantages	Disadvantages
Rebuilds aging facilities that have deteriorated over time and which were damaged by storms	Configuration of space and land use would continue to be less than ideal for the most effective support of operations.
Provides quantity of space required for Station Tybee, ANT Tybee, and CGC POMPANO operations	Wastewater infrastructure on site may not be feasible.
Overall sustainability of Station Tybee facilities inventory would improve with a replacement for Building 101 and other buildings	Siting of new construction would be difficult for the most effective vehicular movement and operations.
Provides resiliency of critical Station Tybee facilities.	Location of a boat ramp along USCG Station Tybee shoreline beyond the riprap area is more expensive and more environmentally damaging than upgrading the existing boat ramp.
	The potential of further Station Tybee development to support future mission growth is extremely limited due to facility/vehicular circulation (for launching/retrieving trailered boats)/land use constraints without land expansion or use of NPS boat ramp and water/wastewater infrastructure.

2.2.3 Alternative 2: Rebuild Option 2 (Preferred Alternative)

Alternative 2 includes demolishing buildings, including Building 101 (15,857 GSF), Building 102, Building 109, the ANT Tybee Building 115, and other ancillary buildings (a total of 23,096 GSF), and constructing a 26,000 GSF MMB to satisfy all the space needs for Station Tybee, ANT Tybee, and CGC POMPANO. As shown on **Figure 2.2**, the MMB would be constructed slightly to the west of the current Building 101, and the main entrance gate would be shifted to the west to create space for circulation, parking for trailered boats, and shop operations. This alternative would also include some associated pavement expansion and utilities extension. The existing eroded riprap shoreline at Station Tybee would be repaired by placing additional stone in the areas to either side of the existing Station pier (see **Figure 2.2**). During the construction period (estimated at 18 to 24 months), temporary space would be provided in leased trailers on site.

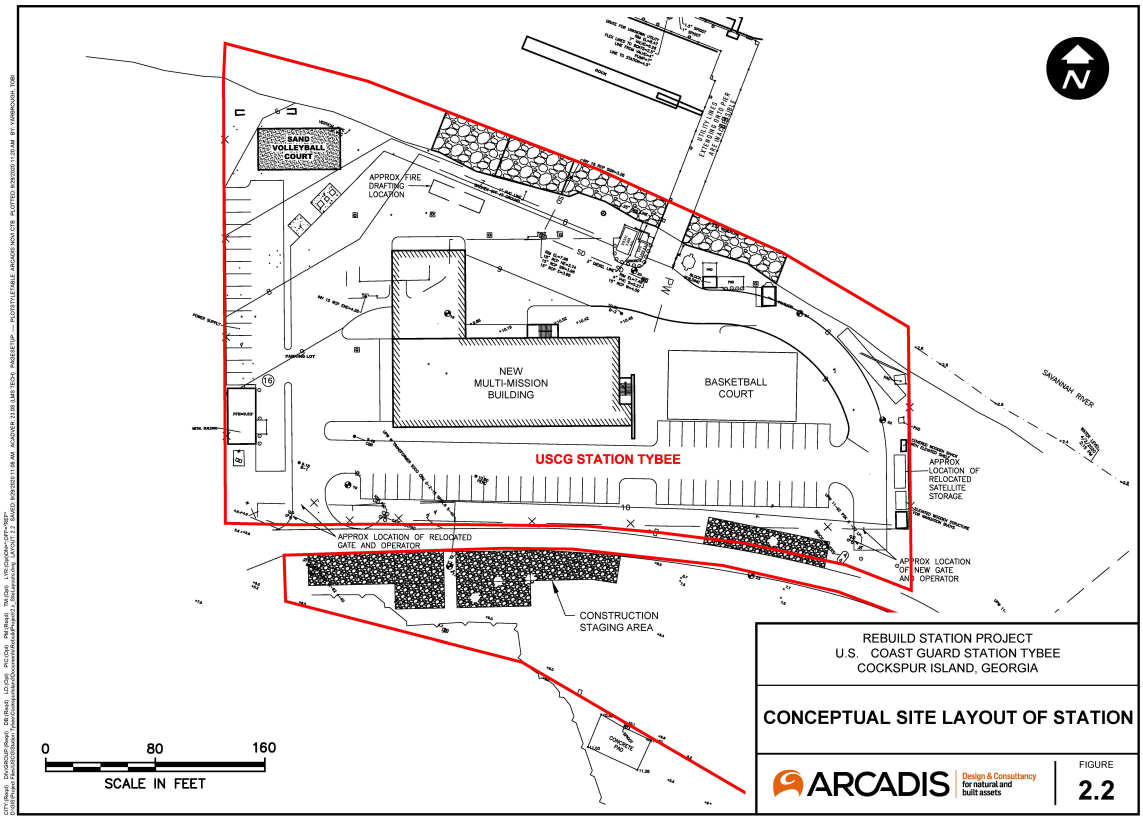

Figure 2.2: Alternative 2 – Proposed Conceptual Site Layout of Station

In contrast to Alternative 1, Alternative 2 would include additional improvements completed beyond the Station Tybee compound. These improvements would include upgrading the existing NPS wastewater treatment system within Area A, upgrading the existing NPS potable water system within Area C, and expanding the NPS boat ramp within Area B. Each of these is briefly discussed below.

Upgrade the Existing NPS Wastewater Treatment System

Upgrade of the existing NPS wastewater treatment system would involve modification to a Mound System within Area A to the southeast of Station Tybee (see **Figure 2.3**). Under the IAA, the USCG will be responsible for improving the existing NPS wastewater treatment system and for costs associated with maintaining the upgraded wastewater treatment system. The NPS will be responsible for installing and maintaining NPS utilities connecting the wastewater treatment system.

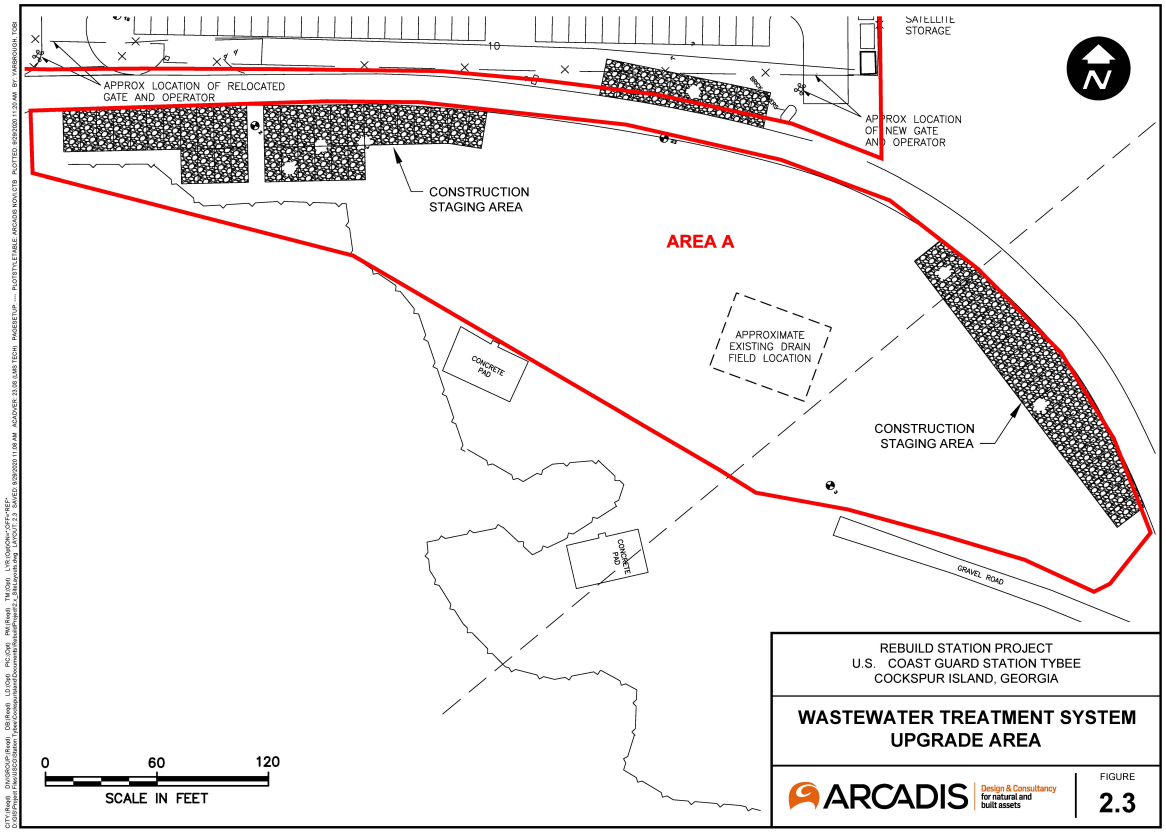

Figure 2.3 Proposed Wastewater Treatment System Upgrade Area

Upgrade the Existing NPS Potable Water Supply System

At the NPS Picnic Pavilion, a new, elevated pump house and emergency generator are proposed to be constructed, and casing for the existing water supply well would be extended to prevent high-salinity flood waters from entering the well and groundwater. As shown on **Figure 2.4**, the preferred location of the new pump house is near the southwest corner of the Picnic Pavilion. To construct the new pump house, it is anticipated that the contractor would place geotextile fabric and a minimum of 6 inches of densely graded aggregate from the access road off Tybee Coast Guard Station Drive to the location of the new pump house. The aggregate, if smoothly graded, may remain in place following construction for potential use as a parking area. Under the IAA, the USCG will be responsible for the initial upgrade of the well and pump house. The NPS will be responsible for all further upgrades and for maintaining the potable water supply system.

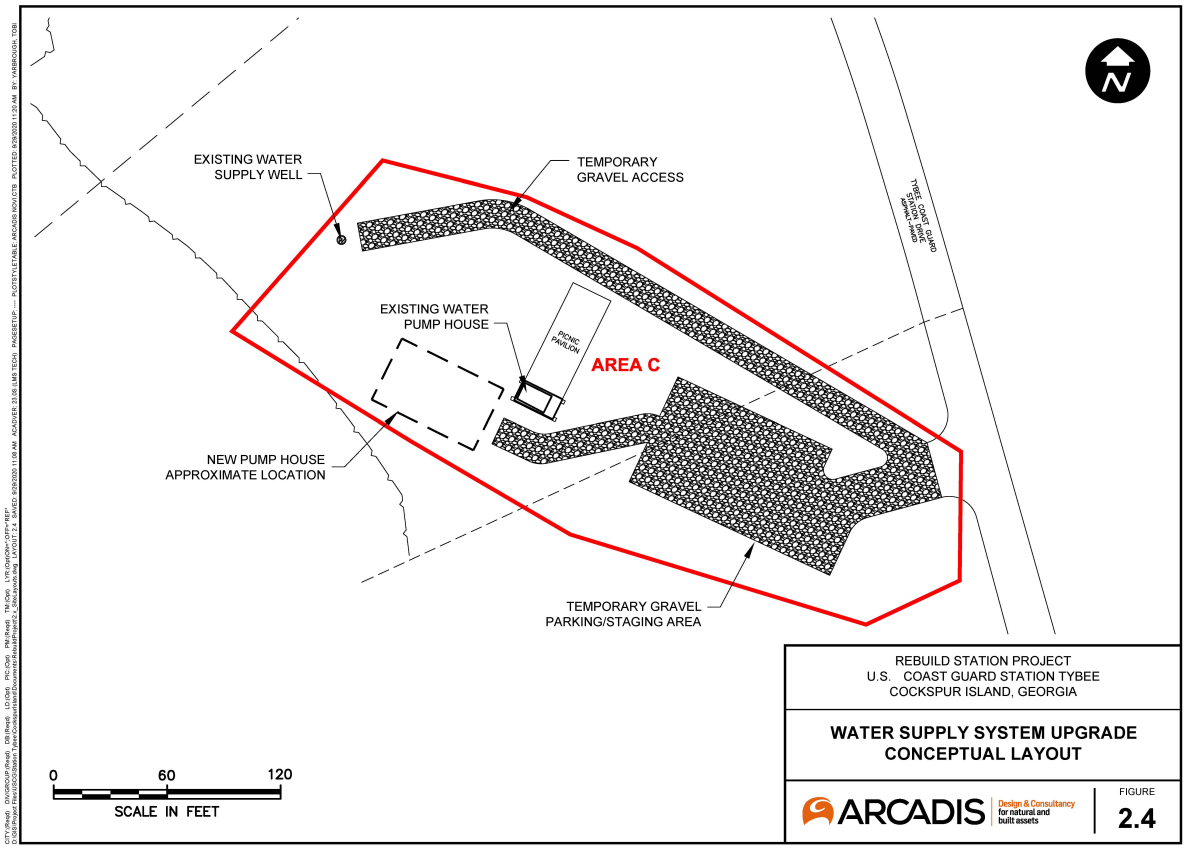

Figure 2.4 Proposed Water Supply System Upgrade Conceptual Layout

Upgrade NPS Boat Ramp

The existing concrete ramp, which is approximately 8 feet wide, would be removed and replaced with a 15-foot-wide concrete ramp. As shown on **Figure 2.5**, the new ramp would extend approximately 50 feet beyond the northern edge of the existing ramp. Two floating docks for launching boats, each 4 feet wide, would be installed on either side of the ramp. The launching docks would extend approximately 115 feet beyond the shore. Under the IAA, the NPS may use the area for administrative purposes.

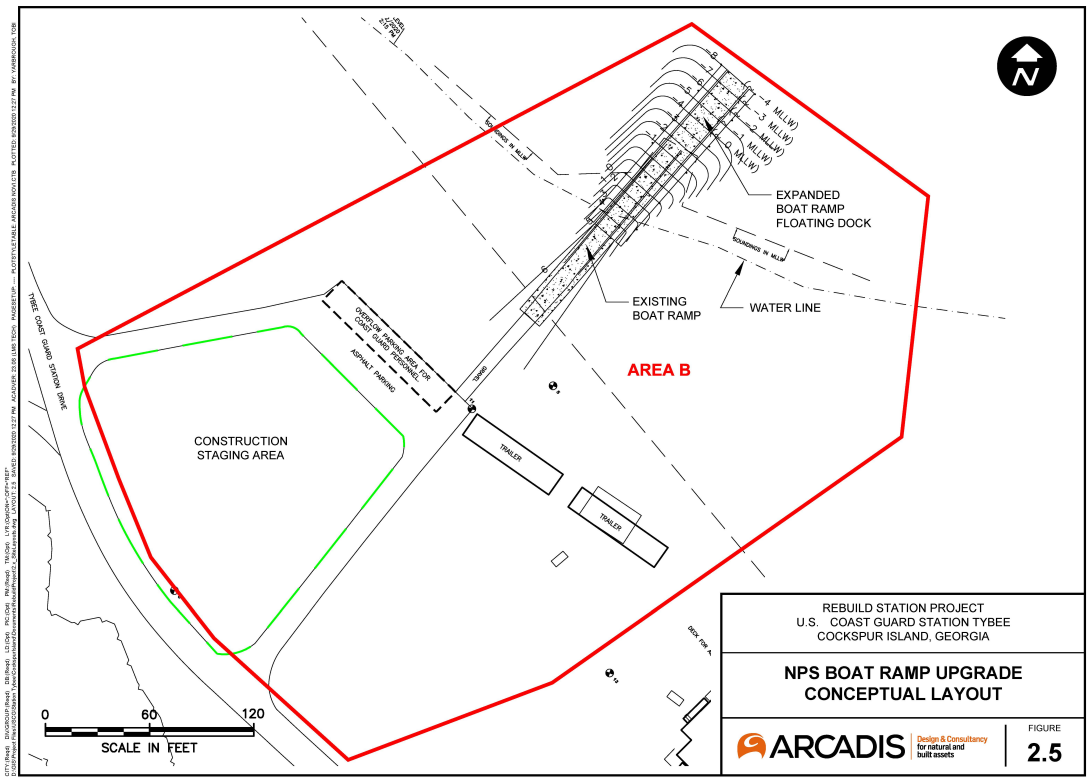

Figure 2.5 Proposed NPS Boat Ramp Upgrade Conceptual Layout

USCG facility planning advantages and disadvantages of Alternative 2 are provided in **Table 2-3.**

Table 2-3: USCG Facility Planning Advantages and Disadvantages of Alternative 2

Advantages	Disadvantages
Rebuilds aging facilities that have deteriorated over time and which were damaged by storms	None identified
Provides quantity of space required for Station Tybee and ANT Tybee operations.	
Overall sustainability of Station Tybee facilities inventory would improve with a replacement for Building 101 and other buildings.	
Provides resiliency of critical Station Tybee facilities.	
Provides required adequate wastewater system for USCG to operate and maintain in the future.	
Provides a boat ramp for Station Tybee close to the Station, reducing time and cost associated with launching and retrieving small boats.	

2.2.4 No Action Alternative

The No Action Alternative would retain existing facilities (buildings and utility infrastructure) for indefinite continued use with only routine repair and maintenance provided. No additional space would be constructed, and no major repair would be performed. Although Station Building 101 requires significant structural repairs to extend its useful life, the cost of major renovation/repair of the building would well exceed 50 percent of its Plant Replacement Value, and the USCG previously determined that it is not cost-effective to attempt major renovation of this building; therefore, the No Action Alternative is deemed non-viable.

USCG facility planning advantages and disadvantages of this alternative are provided in **Table 2-4.**

Table 2-4: USCG Facility Planning Advantages and Disadvantages of the No Action Alternative

Advantages	Disadvantages
USCG would avoid significant near-term construction and improvement cost to replace or construct additions to Station Tybee facilities.	Station Tybee would continue to store and maintain small boats outside, subject to the local environment. This would perpetuate the adverse impacts associated with environmental exposure.
The No Action Alternative has a lower-life cycle cost than Alternatives 1 and 2.	The value of structural repairs to Building 101 to extend the useful life is questionable and is not expected to eliminate the need to replace it in the foreseeable future. Additionally, the cost of major repairs would far exceed 50 percent of the Plant Replacement Value.
	Station Tybee, ANT Tybee, and CGC POMPANO would continue to operate below the reasonable space utilization range.
	The current growth of maintenance and repair needs for aging facilities would be perpetuated for the foreseeable future.
	Launching and retrieval of small boats would continue to rely on the boat ramp on Lazaretto Creek at Tybee Island.

2.2.5 Protection Measures, Permits and Compliance

The Proposed Action may be subject to several federal permits. **Table 2-5** provides a potential permit matrix for the implementation of the rebuild project. Some permit requirements may change once an alternative is selected and final design is conducted. Best management practices (BMPs) and control measures that would be included in the Proposed Action are discussed below.

Table 2-5: Potential Federal Permitting Matrix

Required Permit	Agency	Permit Requiring Activity
Federal Section 404 of the Clean Water Act Permit[a]	USACE	Repair of riprap along Station Tybee shoreline and upgrade of NPS boat ramp
Section 401 Water Quality Certification[a]	GADNR-EPD	Repair of riprap along Station Tybee shoreline and upgrade of NPS boat ramp
National Pollutant Discharge Elimination System (NPDES) Permit for construction activities larger than 1 acre	GADNR	Demolition/Renovation/Replacement of the infrastructure of Station Tybee.

Note: [a] This authorization can be obtained through a joint permit application

The USCG would comply with federal and to the maximum extent practicable State water resource protection, erosion reduction measures, storm water pollution prevention plan (SWPPP) requirements, applicable water discharge permit regulations, and other water quality regulations. Conditions of these plans and permits include BMPs such as the following, which are intended to minimize the potential release of contaminants and the subsequent adverse impacts on water quality, air quality, and waters of the U.S. and minimize impacts on biological resources protected by federal laws.

Water Quality

- The construction contractor would be required to develop and implement a SWPPP that would include BMPs for minimizing and containing dust and debris. The SWPPP would be adhered to in the event of any contaminant release.
- The construction contractor would also be required to prepare and implement a Construction Demolition Plan that would cover all phases of the work to be done and to specify materials, equipment, and procedures to be used to contain construction and demolition waste and debris, including dust.
- The construction contractor would be responsible for preparing and submitting an application for a Section 401 Water Quality Certification and for a Section 404 Nationwide Permit from USACE; the construction contractor would comply with all permit conditions during construction and demolition activities.
- Construction and demolition debris would not be allowed to enter the water.
- The construction contractor will use only clean construction materials suitable for use in the marine environment. The contractor will ensure that no debris, soil, silt, sand, sawdust, rubbish, cement or concrete washings thereof, chemicals, or oil or petroleum products from construction are allowed to enter into or be placed where they may be washed by rainfall or runoff into waters of the U.S. Surface booms, oil-absorbent pads, and similar materials will be maintained onsite to contain any sheen that may occur on the surface of the water during construction. Upon completion of construction activities, all excess material or debris will be completely removed from the work area and disposed of in an appropriate upland site.

- Any equipment proposed for use would be kept in good repair without leaks of fluids. If such leaks or drips occur, they would be cleaned up immediately. Equipment maintenance and/or repair would be confined to one location. Runoff from this area would be controlled to prevent contamination of water. Fueling of land-based vehicles and equipment would take place at least 50 feet away from the water (and away from drains) over an impervious surface. Fueling of vessels would be done at approved fueling facilities.

Air Quality

- Implementation of control measures for reducing fugitive dust emissions practices (e.g., regularly watering exposed soils, soil stockpiling, covering truck loads, etc.).

Biological Resources

- In-water demolition and construction activities would occur in accordance with NOAA NMFS Sea Turtle and Smalltooth Sawfish Construction Conditions (2006).

Cultural Resources

- The USCG will provide for the research of USCG history on Cockspur Island and development and installation of three appropriate interpretative wayside markers on Fort Pulaski's public Lighthouse Overlook Trail.
- For Area A, an archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. To minimize potential effects, the USCG will also provide gravel for all equipment staging areas located in this area.
- For Area B, an archeologist will be on-site during ground disturbing activities associated with the boat ramp upgrade portion of the undertaking and will monitor for the discovery of any potential cultural resources. Should a potential resource be encountered, Post Review Discoveries procedures will be followed. The USCG will also ensure that any construction equipment, heavy equipment, and staging equipment identified by the Memorandum of Agreement (MOA) (see **Appendix E**) avoids the location of a probable resource identified in the 2011 Southeast Archeological Center report. If usage of that area becomes necessary, the USCG will provide matting to minimize impacts.
- For Area C, the USCG will provide for remote sensing in the area associated with the existing well and distribution system. Should intact subsurface features be present, the USCG will reroute any planned ground disturbance that would otherwise disturb them.

2.3 Alternatives Examined but Eliminated from Further Analysis

The USCG considered other alternatives during the planning process but these alternatives were found to be non-viable options and are not examined in this EA as they do not meet the purpose and need for the proposed action or introduce additional impacts to the historic Park Area that would be considered unacceptable to the NPS. These alternatives, and the reasons why they were deemed non-viable, are described below.

Expanding Station Tybee Property to the North or East – This alternative would be similar to the alternatives being evaluated, except that the expansion boundary would have been to the north or the east of the current footprint of Station Tybee. The expansion of the footprint to the north was examined

but considered non-viable because the road leading to Station Tybee would have to be rerouted along with existing utilities, resulting in additional impacts that would be considered unacceptable to the NPS. Eastern expansion was also considered non-viable due to the current configuration of the property and the way the shoreline reduces the land available to the east. Eastern expansion would result in road relocation (as with northern expansion) and an awkwardly shaped parcel that would not be conducive to the siting of facilities at Station Tybee and would introduce additional impacts that would be considered unacceptable to the NPS. Additionally, the northern and eastern expansion options would have further encroached upon areas of Fort Pulaski National Monument that are visible to the public.

Relocate to an Existing Federal Installation – This alternative would demolish all existing facilities at Station Tybee and relocate operations to appropriate existing or new facilities (buildings and piers) on an existing federal installation. Construction, renovation, and/or reconfiguration of these facilities would have to be accomplished as necessary to accommodate Station Tybee, ANT Tybee, and CGC POMPANO mission support requirements. No existing federal installations in the area have a presence on or ready access to the Savannah River. Therefore, this alternative was considered non-viable, as it would not be the purpose of the proposed action, and was eliminated from further consideration in this EA.

Relocate to New Construction on Commercially-Owned Site or General Service Administration-Acquired Property – This alternative would demolish the existing Station Tybee facilities; acquire a commercially owned parcel of land; and rebuild (buildings and piers) on that parcel to accommodate Station Tybee, ANT Tybee, and CGC POMPANO mission support requirements. This alternative does not meet the purpose of the proposed action and is considered non-viable because Station Tybee is currently located ideally for ready response with respect to its SAR mission. Investigation of this alternative failed to identify another site providing equal or better posturing for the SAR mission.

3 AFFECTED ENVIRONMENT

This section discusses and describes natural, physical, and socioeconomic resources that may be potentially affected by the Proposed Action and alternatives. In addition, as directed by CEQ regulations (40 CFR §1501.7), this section identifies those environmental resources that do not require further analysis.

3.1 Resources Eliminated from Detailed Analysis

CEQ regulations (40 CFR §1501.7) state that the lead agency will identify and eliminate from detailed study the issues or resources that are not important or have been covered by previous environmental review, narrowing the discussion of these issues in the document to a brief justification that demonstrates a minor impact on the human environment.

3.1.1 Submerged Aquatic Vegetation

Submerged aquatic vegetation (SAV) is defined as grasses and algae that cover anywhere from 10 to 100 percent of marine substrate. No rooted aquatic or floating vegetation exists in or around Station Tybee, where a large bulkhead and Savannah River shipping channel border the facility. None of the alternatives analyzed would impact SAV; therefore, SAV is not discussed further.

3.1.2 Public Health and Safety

No significant public health and safety impacts would be associated with the implementation of the Proposed Action. Internal procedures and guidelines are in place to protect personnel, including contractors, conducting routine demolition, construction, and/or renovation at Cockspur Island. Potential impacts to public health and safety from the handling, transportation, and disposal of hazardous materials and waste are addressed in Section 4.8.

3.1.3 Visual/Aesthetic Resources

Visual or aesthetic resources would not be significantly impacted by the implementation of the Proposed Action, as the proposed alternatives would occur at the existing Station Tybee, and new construction would meet the NPS restrictions for building aesthetics and height. Additionally, due to intervening topography and trees, there are only partial views of the Station from the Park Headquarters (adjacent Area B), and minimal views beyond this point, as well as no views of the Station from the historic Fort Pulaski itself. Views from recreational amenities, such as trails and the picnicking area, are also limited or obscured by trees. Visual impacts on cultural resources specifically are addressed in Section 4.11.

3.2 Land Use

Land use is a term given to describe the existing management of land and the extent to which it can be modified. Land use regulations are often implemented by governing authorities to manage alterations and functions of the land. Existing land use at Station Tybee and Fort Pulaski National Monument are described below.

Station Tybee is situated on the northern coast of Cockspur Island, north of McQueen's and Tybee Islands off the Georgia coast. Cockspur Island, on which Fort Pulaski National Monument is situated, is located at the mouth of the Savannah River, east of the City of Savannah, Chatham County, Georgia. Fort Pulaski National Monument consists of 5,623 acres on Cockspur and McQueen's Islands that are federally owned and managed by the NPS. It is a popular visitor's attraction with an average visitation of 339,000 people annually since 1995. Fort Pulaski itself is a brick fortification built in the first half of the 19th century. Nearly 5,000 acres of Fort Pulaski consists of salt marsh with the remaining upland acres constituting the major use areas of the park, including exhibit viewing, walking, fishing, exploring the fort, and participating in educational programs (NPS 2013).

Station Tybee occupies an approximate 3.1-acre parcel of land in the northwest portion of Fort Pulaski National Monument. As described previously, Station Tybee contains administrative and operational land uses associated with the USCG functions. The Director of NPS consented to the occupancy of Station Tybee and the associated lands on Cockspur Island by the USCG and determined that the use and occupancy of the property made available under the IAA signed by the NPS and USCG is consistent with the Park Area's General Management Plan (IAA 2020). The NPS transferred administrative jurisdiction of the Station Tybee property to the USCG in 1980 as part of an IAA. The transfer of administrative jurisdiction is authorized by 16 U.S.C. as long as it "does not jeopardize or unduly interfere with the primary natural or historic resource of the area involved and the USCG provided public services within the immediate vicinity of the area..." (Ecology & Environment 2010). Under the terms of the IAA, the USCG is authorized to use the Station area and Areas A, B and C in support of USCG operations providing for the security of the port of Savannah and other waters under the jurisdiction of the United States as well as search and rescue within. Constraints and controls on USCG use of the areas include the following:

- No removal of timber or any other landscape features without NPS's prior written consent.
- No mining or drilling operations, removal of sand, gravel or similar substances from the ground without NPS's prior written consent.
- No posting of signs without the NPS's prior written approval.
- No alterations of any nature to the areas without written approval of the Park Area Superintendent.
- The USCG must ensure any protected site and archaeological resources within the Park Area are not disturbed or damaged by the USCG in accordance with applicable laws and only with prior written approval of the Park Area Superintendent.
- The USCG personnel are made aware of the historic significance of Cockspur Island and Fort Pulaski.

Station Tybee is in the designated administrative zone of Fort Pulaski National Monument. Visitors do not typically enter the administrative zone except to obtain information or assistance. Located west and adjacent to the USCG facilities is a World War II bunker that is a listed historic structure (NPS 2013). The administrative zone also includes NPS maintenance and administrative buildings, show on Figure 3.5, which include the Park Headquarters to the east of Area B and the NPS Maintenance Complex to the southeast of Area B and northwest of Area C. The Savannah Pilots Association has a dock and a dormitory facility east of Station Tybee in the administrative zone (NPS 2013). The remaining area surrounding the administrative zone is composed largely of undeveloped recreational and historical uses associated with Fort Pulaski National Monument. This includes several hiking/walking trails, a section of

camp sites (near to Area A), and a Picnic Pavilion used by visitors (in Area C). Additional uses within Fort Pulaski include wastewater treatment (Area A) and operation/maintenance of the potable water supply (Area C).

Station Tybee is within Chatham County; the northernmost county on the Georgia Coast, located between the Savannah River and Ogeechee River. Chatham County occupies 522 square miles of land, marsh, and water. Of this total, 43 percent is agricultural or undeveloped land; 31 percent is open water, creeks, and tidal marsh; 23 percent is developed or developing; and 3 percent is right-of-way and protected greenspace (Ecology and Environment 2010). Cockspur Island is in an unincorporated area of Chatham County referred to as East Chatham, which occupies 39,569 acres, and is developed at low and medium densities. Land use within East Chatham is predominately marsh and tidal creeks, and Future Land Use Maps included in the 2016 Chatham County-Savannah Metropolitan Planning Commission Comprehensive Plan designated Cockspur Island as a combination of 'conservation' and 'tidal marsh,' with the administrative area within Fort Pulaski categorized as 'civic/institutional' based on anticipated development and planning for the area (Chatham County-Savannah Metropolitan Planning Commission 2016). Although local zoning does not apply to federal property, the City of Savannah classifies the current zoning district for most of Cockspur Island as 'residential-agricultural.'

3.3 Utilities and Infrastructure

3.3.1 Infrastructure

Shore-Based Infrastructure

Station Tybee occupies an approximate 3.1-acre parcel of land and conducts its operations from two primary buildings (101 and 109) and eight ancillary buildings (**Figure 2.1**). USCG has a total of 23,936 GSF of facility space. Station buildings include offices, a galley and mess deck, conference areas, duty berthing rooms and personnel space, shops, storage space, a fitness room, and boat maintenance areas. As previously discussed, several shore facilities are in disrepair and/or do not meet current mission requirements, and there is a shortfall of facility space as well as parking spaces. Further detail has been provided in Section 1.4, Need for Proposed Action.

Waterfront Infrastructure

The existing waterfront infrastructure, originally constructed in 1983, includes the main pier, access pier, north floating dock, and south floating dock (**Figure 2.1**).

In 2017, the USCG repaired the piers and replaced the floating docks at Station Tybee. The repair and replacement project was estimated to extend the service life of the pier structures by 20 years; however, continued maintenance work will be necessary to ensure structural integrity.

Overall, the waterfront facilities are sufficient in size for the operations of Station Tybee and provide adequate coverage for response vessels while docked. Additionally, water depths at Station Tybee are sufficient to support operations. However, no boat ramp is currently located on site, and a boat ramp, although valuable, would not be feasible on site without docks to control launching and retrieval of small boats, due to the currents in the Savannah River.

3.3.2 Utilities

Potable water supply, wastewater disposal, electricity, telecommunications, and solid waste management for Station Tybee are discussed below.

Georgia Power provides electric power to Station Tybee, and BellSouth Telecommunications, LLC provides telecommunication services. One diesel emergency generator, fueled by an aboveground storage tank in the eastern portion of Station Tybee, provides backup power. The buildings at Station Tybee and office trailers are served by central electric heating, ventilation, and air conditioning systems.

Station Tybee and Fort Pulaski National Monument receive potable water from a community water system owned and operated by the NPS and located in Area C. The water system supplies water to approximately 262 users on Cockspur Island and is sufficient to support both NPS and USCG operations (Arcadis 2020). The water is drawn from the Upper Floridian Aquifer (McFarlin and Alber 2005) and treated using a hypochlorination process. The system consists of a well and two underground water supply tanks (one 10,000-gallon and one 15,000-gallon) located west of the Picnic Pavilion and a pump room and chlorine room located in the southern portion of the Picnic Pavilion. The groundwater well was reportedly installed in 1943, and well construction records indicate that the total well depth was 545 feet below ground surface with an inner casing depth of 354 feet and an outer casing depth of 65 feet at the time of construction (Arcadis 2020).

Sanitary wastewater at Station Tybee is discharged via a septic system to a holding tank and then to a leach field in the southeast portion of the Station. Sanitary wastewater at Area A is discharged via a septic system to a holding tank and then to a leach field in the central portion of Area A. Sanitary wastewater at Area B is discharged via a septic system to a holding tank and then to a leach field south of the trailers in Area B. According to the On-Site Sewage Management System Evaluation (PHE-BAKER JV, LLC 2020) the existing Station septic tank capacity is 5,000 gallons per day, and the existing field capacity is 3,532.5 gallons per day. The maximum daily demand exceeds both the septic tank and field capacity at 10,511.2 gallons per day. The current system is overtaxed by demand and would require approximately two times more septic system capacity to meet current demands. (PHE-BAKER JV, LLC 2020).

A private carter (licensed by the GADNR EPD) provides services for collecting, handling, and disposing of solid waste generated by Station Tybee at a landfill. In addition, construction debris is disposed of at an off-site landfill by the contractor responsible for any renovation or demolition. Station Tybee personnel are responsible for the collection, segregation, and accumulation of domestic waste recyclables, which are disposed of by the private carter.

3.4 Socioeconomic Environment

Socioeconomics is the multi-disciplinary evaluation of economic activity and social well-being. General socioeconomic categories investigated as part of this EA include population and demographics, employment and income, and housing. The socioeconomic conditions for the City of Savannah and Chatham County, Georgia are described below.

3.4.1 Population and Demographics

Chatham County consists of eight incorporated municipalities together with several additional unincorporated locations and, per U.S. Census Bureau data current as of July 1, 2019, has an estimated population of 289,430 (U.S. Census Bureau 2020). Regionally, Chatham County is the largest in a three-county Metropolitan Statistical Area (MSA) that also includes Bryan and Effingham Counties. Historically, the City of Savannah and Chatham County have comprised the region's largest population center and commercial core (Chatham County-Savannah Metropolitan Planning Commission 2016). **Table 3-1** below provides general demographic information on the City of Savannah, Chatham County, and the State of Georgia as a whole. It is projected that, by the year 2030, the residential population of Chatham County will grow to approximately 313,387, and the state's residential population will grow to approximately 12,292,423 (Georgia Governor's Office, Office of Planning and Budget 2018).

Table 3-1: U.S. Census Bureau Population Estimates Program (PEP) Demographic Information 2019

Demographic	City of Savannah, GA	Chatham County, GA	State of Georgia	United States
Total Population	144,464	289,430	10,617,423	328,239,523
Percentage Male	47.6	48.0	48.6	49.2
Percentage Female	52.4	52.0	51.4	50.8

Source: U.S. Census Bureau 2020

The overall populations of the City of Savannah and the larger Chatham County are ethnically diverse, with some variance between the two, as shown in **Table 3-2**. In general, African American and Hispanic populations have increased from 2010 and are expected to continue to increase based on the most recent U.S. Census 2063 projections, whereas the White population has decreased from 2010 and is expected to continue to decrease based on the 2063 projections (Chatham County-Savannah Metropolitan Planning Commission 2016).

Table 3-2: U.S. Census Bureau PEP Ethnic Profile 2019

Race	City of Savannah, GA	Chatham County, GA	State of Georgia	United States
White, alone (%)	38.7	53.0	60.2	76.3
Black or African American, alone (%)	54.4	41.2	32.6	13.4
American Indian and Alaska Native, alone (%)	0.2	0.4	0.5	1.3
Asian, alone (%)	2.4	2.9	4.4	5.9
Native Hawaiian and Other Pacific Islander, alone (%)	0.1	0.1	0.0	0.2
Two or More Races (%)	3.0	2.3	2.2	2.8
Hispanic or Latino (%)	5.1	6.7	9.9	18.5
White, alone, not Hispanic or Latino[1] (%)	35.5	47.8	52.0	60.1

Source: U.S. Census Bureau 2020

PEP = Population Estimates Program

3.4.2 Employment and Income

Employment characteristics for the MSA that includes Chatham County are dominated by the shipping industry, service industry, military, tourism, and manufacturing.

The Port of Savannah, operated by the Georgia Port Authority (GPA), is the largest terminal container facility in North America and contributes more than 369,000 jobs to the State of Georgia annually (Chatham County-Savannah Metropolitan Planning Commission 2016). The trucking and rail services associated with the terminal further enhance the Port of Savannah's overall economic impact and, in September of 2019, the GPA announced plans for a new container port on Hutchinson Island opposite the existing terminal facility (Nussbaum 2019). This new container port is anticipated to facilitate additional economic growth by increasing the Port of Savannah's annual capacity to 11 million 20-foot-equivalent container units from the current 5.5 million 20-foot-equivalent container units, which will bolster operations and also foster railroad expansion (Nussbaum 2019).

The service industry includes employment in health and medical facilities, retail, hospitality, education, insurance, banking, and advertising fields. Major hospitals, including Candler, St. Joseph's, and Memorial Hospitals, are among the most visible components of the City of Savannah's health care industry. The City and County's prominent educational institutions include Savannah State University, South University, Armstrong State University, Savannah Technical College, Savannah College of Art and Design, and the Chatham County Board of Education (Chatham County-Savannah Metropolitan Planning Commission 2016).

Fort Stewart and Hunter Army Airfield, located within the identified MSA, comprise one of coastal Georgia's most significant employers. Together, Fort Stewart and Hunter Army Airfield employ approximately 22,422 military officers and other enlisted military, as well as 3,891 civilian workers. Total payroll for these bases is estimated at more than 1 billion dollars, with an annual financial impact of 4 to 5 billion dollars (Chatham County-Savannah Metropolitan Planning Commission 2016). Additional military operations in the region include detachments of the U.S. Army, Navy, and Marine Corps Reserve; U.S. Air National Guard; USCG; Parris Island Marine Corps Training Facility; and Marine Corps Air Station Beaufort.

The Savannah-Chatham area is a top tourist destination due, in part, to its beaches, fishing, lodging, and dining, and Savannah alone draws several million visitors annually (NPS 2013). Additionally, the Savannah National Landmark Historic District is the largest of its kind in the United States and further bolsters tourism to the region (Chatham County-Savannah Metropolitan Planning Commission 2016).

Chatham County has a varied manufacturing base, which includes paper and forest products, chemicals, construction equipment, and food processing elements, among other components. Overall, manufacturing jobs account for some of the largest employers and highest wage-earning workers across Georgia.

Available Chatham County data indicate that local unemployment has generally been declining since the 2008 recession, although the unemployment rate in the region is higher than the national average (Chatham County-Savannah Metropolitan Planning Commission 2016). As shown in **Table 3-3**, median household income is higher for Chatham County than for the City of Savannah, but both figures fall below state and national employment statistics.

Table 3-3: American Community Survey (ACS) 5-Year Estimates Data Profile Employment/Income Rates 2018

Employment Characteristics	City of Savannah, GA	Chatham County, GA	State of Georgia	United States
Employed, civilian (%)	56.1	58.7	58.4	59.3
Unemployed, civilian (%)	6.2	5.1	4.0	3.7
Median Household Income ($)	41,093	54,911	55,697	60,293
Below Poverty Level (%)	22.9	14.4	14.3	11.8

Source: U.S. Census Bureau 2018

Note: Population 16 years and older

3.4.3 Housing

Housing opportunities in Chatham County range from restored 18th century townhomes, to beachfront cottages, to golf lot patio homes, to secluded marsh-view hideaways, all within a wide variety of price ranges and sizes. As of 2014, residential land uses occupied more than 33,000 acres of Chatham County, with single-family homes accounting for more than 60 percent of total housing units, followed by multi-family and then manufactured homes. Chatham County and the City of Savannah are working to promote an acceptable range of quality housing through the following strategies: 1) encouraging development of a variety of housing types, sizes, costs, and densities in each neighborhood; 2) enacting programs to provide housing for residents of all socioeconomic backgrounds including affordable mortgage finance options; 3) instituting programs to address homelessness issues in the community; and 4) coordinating with local economic development programs to ensure availability of adequate workforce housing in the community (Chatham County-Savannah Metropolitan Planning Commission 2016). **Table 3-4** displays significant housing data for the City of Savannah, Chatham County, the State of Georgia, and the U.S.

Table 3-4: U.S. Census Bureau PEP Housing Unit Data 2019 & ACS 5-Year Estimates Data Profile Vacant Housing 2018

Housing Data	City of Savannah, GA	Chatham County, GA	State of Georgia	United States
Total Housing Units	62,236	127,433	4,378,391	139,684,244
Vacant Housing (%)	14.5	13.0	12.5	12.2

Source: U.S. Census Bureau 2020, 2018

3.5 Recreational Facilities

Although the Proposed Action is near the visitor's attractions and recreational areas of Fort Pulaski National Monument, limited recreational amenities exist within the project boundaries. The only recreational facilities that are accessible to the public within the project areas are a Picnic Pavilion and accessory picnicking area situated among trees (Area C). This pavilion/picnicking space is available for public use by visitors to Fort Pulaski. There are also camp sites adjacent to and near Area A that are outside the anticipated work boundary but may be indirectly affected by the proposed project (due to noise, traffic, etc.).

3.6 Fire, Rescue, and Police Services

There is a range of authorities responsible for fire, rescue, and police services across Chatham County.

Tybee Island is under the jurisdiction of the City of Tybee Island Police Department while Fort Pulaski National Monument is served by NPS Law Enforcement and Ranger staff. The Chatham County Police Department has jurisdiction over the larger, unincorporated area of the County (roughly 196 square miles), while the Savannah Police Department has jurisdiction over the City of Savannah and is composed of four precincts (northwest, southside, central, and east side) and a central headquarters.

Fire protection on Tybee Island is provided by the City of Tybee Island Fire Department. The NPS implements additional fire management programs at Fort Pulaski National Monument, that are "designed to meet resource management objectives prescribed for the various areas of the monument and to ensure that the safety of firefighters and the public are not compromised" (NPS 2013). An approved fire management plan is followed to effectively address all wildland fires in a way that considers both protection of resources and preservation of safety using a full range of pre-developed strategic and tactical operations (NPS 2013). Several other fire departments exist throughout Chatham County including the Savannah Fire Department and the Isle of Hope Volunteer Fire Department.

Station Tybee itself functions as a coastal SAR station, among its other missions. Additional emergency rescue services in the region include Marine Rescue Squadron 1-A Tybee, a volunteer group that assists in the rescue of small craft and personnel, and Project Lifesaver, a specialized SAR program that serves persons with disabilities or other physical/mental needs (e.g., Alzheimer's patients, persons with autism, persons with Down syndrome, persons with traumatic brain injuries).

3.7 Physical Environment

3.7.1 Geology, Topography, and Soils

The soils mapped by the USDA NRCS Web Soil Survey within Station Tybee are dominated by Made Land, which is likely the result of dredging and filling (see **Figure 3.1** for mapped soils at Station Tybee) (USDA NRCS 2020). Made Land is not hydric and consists of built-up areas that were formerly marshland. Dredged materials from the Savannah River shipping channel were deposited along the island's edge and have increased the area of upland habitat, providing protection from storm wash-over and allowing for the establishment of forests. The island is approximately 45 percent dry land today, with 260 acres of upland supporting successional phases of maritime forest habitat.

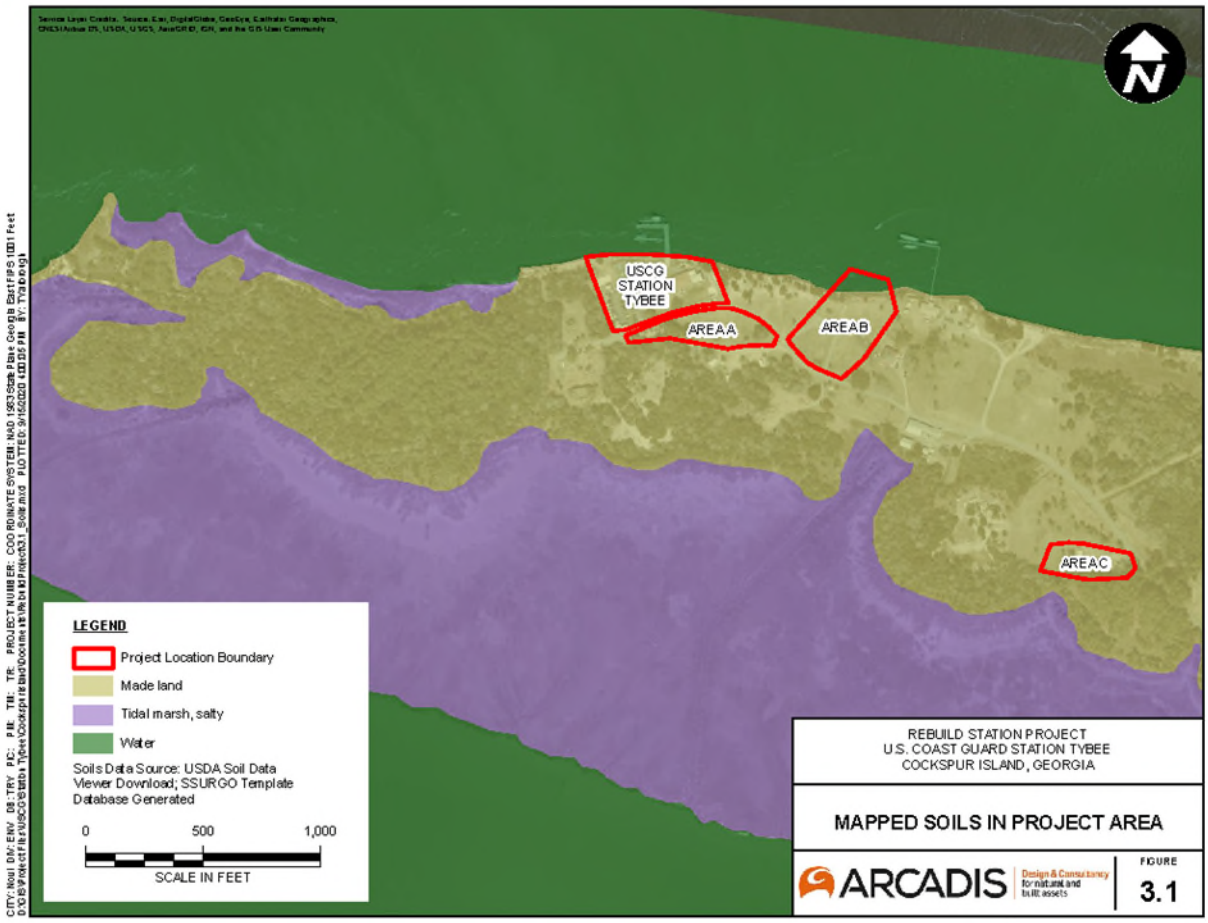

Figure 3.1: Mapped Soils in Project Area

3.7.2 Air Quality

The CAA of 1970, 42 U.S.C. 7401 et seq., amended in 1977 and 1990, is the primary federal statute governing air pollution. The CAA designates six pollutants as criteria pollutants, for which National Ambient Air Quality Standards (NAAQS) have been promulgated to protect public health and welfare.

The six criteria pollutants are particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead, and ozone (O_3). Volatile organic compounds (VOCs) are not considered criteria pollutants, but emissions of VOCs are linked to O_3 concentrations. In addition, federal law requires state or local air quality control agencies to establish a State Implementation Plan (SIP) that prescribes measures to achieve or maintain attainment of these standards. Areas that do not meet NAAQS are designated as "non-attainment" for that criteria pollutant. USEPA Region 4 and the GADNR EPD, Air Protection Branch, regulate air quality in Georgia (GADNR EPD 2020). USCG Station Tybee is in the Savannah (Georgia) - Beaufort (South Carolina) Interstate Air Quality Control Region (40 CFR 81.113).

The General Conformity Rule has been promulgated by the USEPA to ensure that the actions of federal departments or agencies conform to the applicable SIP. The General Conformity Rule covers direct and indirect emissions of criteria pollutants or their precursors that are caused by a federal action. Conformity evaluations are not required for areas that are "in attainment" for NAAQS. USCG Station Tybee is located in Chatham County, Georgia, which is an attainment area for all criteria pollutants based on the USEPA August 31, 2020 designations (USEPA 2020a); therefore, no applicability analysis under the General Conformity Rule is required. The attainment status for all the criteria pollutants for Chatham County are listed in **Table 3-5**.

Table 3-5: Attainment Status for Chatham County for Criteria Pollutants

Pollutant	Averaging time	NAAQS	Form	Status
CO ppm	1-hr	35	Not to exceed more than once per year	Attainment
	8-hr	9		
NO_2 ppm	1-hr	0.100	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years	Attainment
	Annual	0.053	Annual mean	Attainment
O_3 ppm	8-hr	0.070	Annual fourth-highest daily maximum 8-hour	Attainment
SO_2 ppm	1-hr	0.075	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years	Attainment
	3-hr	0.5	Not to exceed more than once per year	
Particulate Matter ($PM_{2.5}$), µg/m^3	24-hr	35	98th percentile, averaged over 3 years	Attainment
	Annual	12.0	Annual mean, averaged over 3 years	
Particulate Matter (PM_{10}), µg/m^3	24-hr	150	Not to exceed more than once per year on average over 3 years	Attainment
Lead, µg/m^3	Quarterly	0.15	Not to exceed	Attainment

Source: USEPA 2020a, 2020b
Key:
µg/m^3 = micrograms per cubic meter
hr = hour
ppm = parts per million

The CAA, Section 169A, established the Prevention of Significant Deterioration (PSD) regulations to protect the air quality in regions that already meet the NAAQS. The primary purpose of the PSD regulation is to ensure that impacts from new or modified sources combined with other sources do not exceed the maximum allowable incremental increase for those pollutants in attainment. The PSD analysis is only required for point sources and, therefore, does not apply to the Proposed Action (USEPA 1981).

Greenhouse gases (GHGs) include water vapor, carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs are regulated under Section 202 of the CAA, which establishes fuel efficiency and renewable fuel standards on light-duty, medium-duty, and heavy-duty vehicles. The USEPA also regulates GHGs through mobile source emission standards and operating permits issued under Title V of the CAA.

3.7.3 Noise

Noise is unwanted sound. Sound becomes noise when it interferes with normal activities such as sleep or conversation. Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and are sensed by the human ear. The measurement and human perception of sound involve three basic physical characteristics: intensity, frequency, and duration. Intensity is a measure of the acoustic energy of the sound vibrations and is expressed in terms of sound pressure. Frequency is the number of times per second the air vibrates or oscillates. Duration is the length of time during which the sound can be detected. Existing noise at Station Tybee and Fort Pulaski National Monument is described below.

The NPS uses the term “soundscape” to describe the natural sounds that occur in parks. Natural sounds occur within and beyond the range of sounds that humans can perceive, and they can be transmitted through air, water, or solid materials. Examples of such natural sounds include the following:

- Sounds produced by birds, frogs, or katydids to define territories or aid in attracting mates.
- Sounds produced by bats or porpoises to locate prey or navigate.
- Sounds received by mice or deer to detect and avoid predators or other danger.
- Sounds produced by physical processes such as wind in the trees, claps of thunder, or falling water (NPS 2006).

Natural sounds associated with Fort Pulaski National Monument include wind, bird calls (including seagull calls), insect sounds, lapping water, and natural stillness/quiet.

Cockspur Island is located between U.S. Highway 80 to the south (on McQueen’s Island) and the Savannah River, which are major thoroughfares for vehicle and container ship traffic, respectively. As such, the sounds of ship horns and other shipping-related maritime equipment are present at Fort Pulaski National Monument (NPS 2015). Despite heavy usage of the identified thoroughfares, Cockspur Island remains relatively quiet and serene (NPS 2015).

As part of the NPS Management Policy, the NPS works to preserve, to the greatest extent possible, the natural soundscapes of parks (NPS 2006). Station Tybee, as stated in the IAA, is authorized administrative jurisdiction as long as it does not interfere with the primary natural resources of the area.

The NPS considers the natural soundscape a primary resource; therefore, the USCG, to the greatest extent possible, should not interfere with the natural soundscape.

Station Tybee is located within the administrative zone of Fort Pulaski National Monument and away from the monuments, main attractions, and visitors' areas. Noise associated with the Station includes vehicle traffic and marine noise and is consistent with other noise located within the administrative area. No perceived loud noises are produced at the Station, and no loud noises are heard off site (USCG 2008). USCG operations and associated noise do not currently interfere with the natural soundscape at Fort Pulaski National Monument.

In accordance with the Noise Control Act of 1972 (42 U.S.C. §4901 et seq.), federal agencies must comply with federal, state, and local requirements respecting control and abatement of environmental noise. Chatham County Building Safety regulations require that construction be conducted between 7:00 a.m. and 10:00 p.m. to reduce noise impacts (Chatham County 2020).

3.7.4 Hazardous Materials/Waste

Databases maintained by the USEPA and GADNR EPD were reviewed to evaluate the past and present environmental condition of the Proposed Action areas. The search identified no Superfund sites, no Comprehensive Environmental Response Compensation and Liability Information sites, and no state-listed hazardous waste sites within a 1-mile radius of Station Tybee. The search also identified Station Tybee as the only Resource Conservation and Recovery Act (RCRA) waste generator in a 0.5-mile radius (EDR 2020).

Station Tybee is currently listed as a RCRA Very Small Quantity Generator, meaning that it generates 100 kilograms or less per month of hazardous waste or 1 kilogram or less per month of acutely hazardous waste (USEPA Undated). The USCG conducted an Environmental Due Diligence Audit (EDDA) in 2020 to evaluate potential contamination issues at Station Tybee (Arcadis 2020). No hazardous materials were observed to be generated or disposed of at Station Tybee or the proposed and alternative project areas during the EDDA. Also, no known hazardous building materials were identified. Ultimately, the EDDA concluded that no conditions of environmental concern exist or present a current risk. The EDDA reported one historical environmental condition associated with a leaking underground petroleum storage tank incident at Station Tybee; however, the incident was closed and received a No Further Action Letter in 1998 from the Georgia Environmental Protection Division. Because the underground petroleum storage tank incident has received closure and has been remediated to unrestricted land use, it was determined to not pose a current environmental risk (Arcadis 2020).

Hazardous building materials, such as asbestos-containing materials and lead-based paint, are not likely to be present in the existing facilities. In 1978, federal regulations banned consumer uses of lead-based paint. Between 1973 and 1978, under the asbestos National Emission Standard for Hazardous Air Pollutants, the USEPA banned spray-applied surfacing asbestos-containing materials. Structures on site were constructed in 1983 or later, after the federal regulations were implemented. Hazardous building materials are currently managed under an Operations and Management Plan, which specifies work practices and procedures to be employed by trained personnel during building cleaning, maintenance, renovation, and general operational activities.

Station Tybee personnel are responsible for the proper management and administration of the environmental program including hazardous material management, hazardous waste disposal, hazardous

waste minimization, pollution prevention, health and safety, and environmental permitting. Station activities are conducted in accordance with a variety of applicable regulations, including U.S. Occupational Safety and Health Administration regulations, USCG Safety and Environmental Health Manual (COMDINST M5100.47(series)), and local facility policies and procedures. These regulations and the associated protocols, equipment, and training ensure that USCG operations and shore activities are conducted in a safe environment.

3.8 Biological Resources

Station Tybee lies within the boundaries of Fort Pulaski National Monument on the north shore of Cockspur Island. Fort Pulaski contains upland, tidal marsh, and mud flat communities that provide refuge for numerous permanent and migratory wildlife species. The park contains one of the largest federally owned and protected tidal salt marshes in the country. Some of Fort Pulaski's biodiversity can be attributed to dredge spoil that was deposited on Cockspur Island from 1867 to 1996. This activity dramatically changed the ecosystem from a tidal marsh wetland community to an upland forest community in certain locations and, in turn, altered plant and animal species composition.

Desktop studies were conducted to obtain data from regulatory agency websites including: the State of Georgia Natural, Archaeological, and Historic Resources Geographic Information System Ecology Review and Survey Module; USFWS Information for Planning and Consultation site; the Integrated Resource Management Applications (IRMA) Portal NPSpecies; and the Georgia Biodiversity Portal. Early coordination with GADNR Wildlife Resource Division and Coastal Resources Division, the USFWS, and the NMFS was completed. In addition, regulatory agencies that provided initial feedback on biological resources were sent the Draft EA to review and give further comment. A site visit was conducted on July 17, 2020 to complete a terrestrial field survey to document vegetation that may be cleared during implementation of the Proposed Action and to determine the presence/absence of federally listed threatened and endangered species, state protected species, Migratory Bird Treaty Act (MBTA) protected species, and federally protected Critical Habitat. Information obtained from websites, agency coordination, and the terrestrial field survey is discussed in the sections below.

3.8.1 Vegetation

The Station Tybee compound consists of parking lots, buildings, and turf grasses up to the riprap at the Savannah River shoreline. Sea oxeye (*Borrichia frutescens*) is growing in the riprap along the shoreline. A forested habitat was observed beyond the western boundary of the Station. Dominant species of the forest include hackberry (*Celtis occidentalis*), cabbage palm (*Sabal palmetto*), dwarf palmetto (*Sabal minor*), live oak (*Quercus virginiana*), red cedar (*Juniperus virginiana*), and yaupon holly (*Ilex vomitoria*). This forested area may be suitable habitat for Florida privet (*Forestiera segregata*), a state rare species, which is discussed further in Section 3.8.4 below.

Area A consists of roads and turf grasses, with scattered trees including hackberry, cabbage palm, dwarf palmetto, and live oak. Area B consists of turf grass that extends from the parking area to the NPS boat ramp at the southern shoreline of the Savannah River. Small amounts of vegetation growing throughout the riprap surrounding both sides of the boat ramp consist of perennial glasswort (*Salicornia virginica*), salt marsh grass (*Spartina alterniflora*), and sea oxeye. Area C consists of turf grasses and a few scattered cabbage palms, with a pavilion and restroom structure. Adjacent to Area C is a picnic area

among slash pine (*Pinus elliottii*) trees to the south, which is bordered by a small, wooded strip. This wooded strip is about 30 feet wide and consists mainly of cabbage palm and dwarf palmetto before tidal marsh begins.

3.8.2 Wildlife

The estuarine marshes and upland areas of Fort Pulaski support many species of wildlife. Large populations of both resident and migrant birds are also present. Mammals are abundant and include marsh rabbit (*Sylvilagus palustris*), raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), mink (*Mustela vison*), otter (*Lutra canadensis*), and white-tailed deer (*Odocoileus virginianus*). Cormorants, seagulls, mergansers, hawks, herons, egrets, ibis, rails, and terns can be found nesting and feeding in many of these areas. There are many species of reptiles including the eastern diamondback rattlesnake (*Crotalus adamanteus*). The tidal waters surrounding Fort Pulaski contain a wide variety of fish typical of southern coastal estuaries (Rabolli and Ellington 1999). Protected terrestrial wildlife and marine species are discussed further in Section 3.8.4 below.

Cockspur Island is surrounded by vast salt marshes interspersed by rivers and tidal estuaries. These tidal marshes, formed in conjunction with barrier island development, have delicate ecological characteristics including essential life support systems for shrimp, oysters, clams, mussels, and the usual variety of fish found in southern coastal estuaries. During the terrestrial field survey, a decaying horseshoe crab (*Larus delawarensis*) was found in turf grasses in Area B.

3.8.3 Migratory Birds

The MBTA of 1918 (16 U.S.C. 701-715s) is the primary legislation in the U.S. established to conserve migratory birds. It implements the United States' commitment to four bilateral treaties or conventions for the protection of a shared migratory bird resource. The MBTA prohibits the taking, killing, or possessing of migratory birds unless permitted by regulation. The species of birds protected by the MBTA are identified in Title 50 CFR Section 10.13. Similarly, EO 13186 requires federal agencies to support the conservation intent of the migratory bird conventions by integrating bird conservation principles, measures, and practices into agency activities; by avoiding or minimizing adverse impacts on migratory bird resources; and by minimizing the intentional take of species of concern.

Hundreds of species of migratory birds can be found along Georgia's Atlantic Coast, particularly along undeveloped coastal areas and barrier islands including Fort Pulaski. Representative migratory species include herons, warblers, terns, sandpipers, plovers, shrikes, and hawks. Protected bird species are discussed further in Section 3.8.4.

3.8.4 Threatened and Endangered Species

The ESA, as amended (16 U.S.C. 1531, et seq.), was designed to prevent the extinction of native and foreign species of wild flora and fauna. The ESA defines an endangered species as any animal or plant in danger of extinction and a threatened species as any plant or animal likely to become extinct within the foreseeable future. This act makes it illegal to harass, harm, or kill listed species or to possess, transport, buy, or sell the species or parts thereof in the course of an interstate or foreign commercial activity. A permit authorizing any prohibited activity may be issued for scientific research, educational purposes, enhancement of propagation or survival of the species, and incidental taking (not available for plants).

The GADNR Wildlife Resource Division regulates the state listed species designated as endangered (E), threatened (T), or rare (R), in accordance with Georgia Rule 391-4-10. Per Georgia Rule 391-4-10-.06(a), "Any activities which are intended to harass, capture, kill, or otherwise directly cause death of any protected animal species are prohibited, except as specifically authorized by law or by regulation as adopted by the Board of Natural Resources" and "The destruction of the habitat of any protected animal species on public lands is prohibited." Although USCG, as a federal agency, is not subject to state listed species regulations, the USCG will comply with state laws and regulations to the maximum extent practicable.

Several federal and state listed species occur in Chatham County (USFWS 2020a); however, based on the existing environment of USCG Station Tybee, this EA only discusses protected species that have suitable habitat in the vicinity of the project location boundary. There are 13 federally listed and seven state listed species that have suitable habitat in the vicinity of the project location boundary, as summarized in **Table 3-6** below. Protected species habitat is shown on **Figure 3.2**.

Table 3-6: Listed Species with Suitable Habitat Near USCG Station Tybee

Common Name	Scientific Name	Federal Listing	State Listing	Habitat	Previously Known to Occur	Regulatory Agency Authority
Vegetation						
Florida privet	*Forestiera segregata*	N	R	Forest adjacent to Station	1.4 miles SE[1]; Fort Pulaski[2]	GADNR
Mammals						
North Atlantic right whale	*Eubalaena glacialis*	E, CH	E	Nearshore ocean waters		NOAA NMFS
West Indian manatee	*Trichechus manatus*	T	E	Savannah River	Near project site in Savannah River[1]	USFWS
Reptiles						
Green sea turtle	*Chelonia mydas*	T	T	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Hawksbill sea turtle	*Eretmochelys imbricata*	E	E	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Leatherback sea turtle	*Dermochelys coriacea*	E	E	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Loggerhead sea turtle	*Caretta*	T, CH	E	Savannah River Project Area Overlaps Critical Habitat	2.6 miles E[1]	USFWS (nesting) NOAA NMFS (open water)

Common Name	Scientific Name	Federal Listing	State Listing	Habitat	Previously Known to Occur	Regulatory Agency Authority
Kemp's ridley sea turtle	*Lepidochelys kempii*	E	E	Savannah River		USFWS (nesting) NOAA NMFS (open water)
Fish						
Atlantic sturgeon	*Acipenser oxyrinchus*	E, CH	E	Savannah River	9.8 miles W in Savannah River[1]	NOAA NMFS
Shortnose sturgeon	*A. brevirostrum*	E	E	Savannah River	1.6 miles NW in Savannah River[1]	NOAA NMFS
Birds						
American oystercatcher	*Haematopus palliates*	N	R	Shoreline of Station and Area B	2.4 miles SW; Fort Pulaski[2]	GADNR
American swallow-tailed kite	*Elanoides forficatus*	N	R	Shoreline of Station and Area B	Fort Pulaski[2]	GADNR
Bald eagle	*Haliaeetus leucocephalus*	N	T	Foraging habitat in Savannah River	1.2 miles W[1]; Fort Pulaski[2]	GADNR
Black skimmer	*Rynchops niger*	N	T	Shoreline of Station and Area B	0.5 miles NE (historic)[1]; Fort Pulaski[2]	GADNR
Least tern	*Sterna antillarum*	N	R	Shoreline of Station and Area B	0.6 miles NW (historic)[1]	GADNR
Piping plover	*Charadrius melodus*	T, CH	T	Shoreline of Station and Area B	Fort Pulaski[2]	USFWS
Red knot	*Calidris canutus*	T	T	Shoreline of Station and Area B	Fort Pulaski[2]	USFWS
Wilson's plover	*Charadrius wilsonia*	N	T	Shoreline of Station and Area B	Fort Pulaski[2]	GADNR
Wood stork	*Mycteria americana*	T	E	Shoreline of Station and Area B	Fort Pulaski[2]	USFWS
Eastern black rail	*Laterallus jamaicensis*	T	N	Shoreline of Station and Area B		USFWS

[1] Georgia Natural, Archaeological, and Historic Resources Geographic Information System Letter from GADNR (July 28, 2020);
[2]IRMA Portal NP Species accessed July 2020

STATUS DESIGNATIONS
CH = Critical Habitat
E = Endangered
N= None
R = Rare
T = Threatened

Other than for foraging purposes, there is no suitable habitat for protected species within the Action Area, which includes the Station and Areas A, B and C. There were no protected species observed during the terrestrial field survey. Vegetation growing in the riprap along the shoreline and shallow water at high tide near the Station and in Area B creates suitable foraging habitat for several listed bird species as listed

above in **Table 3-6**. Although there were no listed bird species observed during the terrestrial field survey, four federally listed threatened bird species (piping plover, red knot, wood stork, and eastern black rail) may utilize this foraging habitat on a transient basis. The north end of Tybee Island at the mouth of the Savannah River, which is outside of the Action Area, is designated as Critical Habitat for piping plover. Additionally, forested habitat suitable for Florida privet was observed beyond the western boundary of the Station compound. However, no Florida privet individuals were observed in this forested area.

There were no listed marine species observed in the Savannah River. Suitable estuarine and/or nearshore marine habitats for listed marine species exists within the vicinity of the Action Area and there are nine federally listed endangered or threatened marine species that may utilize these habitats in the vicinity of the Action Area during various times of the year, as listed above in **Table 3-6**. The Savannah River estuary and nearshore marine waters in the vicinity of the Action Area contain designated Critical Habitats for three federally listed species: loggerhead sea turtle, Northern Atlantic right whale, and Atlantic sturgeon. The USCG consulted under Section 7 of the Endangered Species Act with NOAA NMFS (see **Appendix A**).

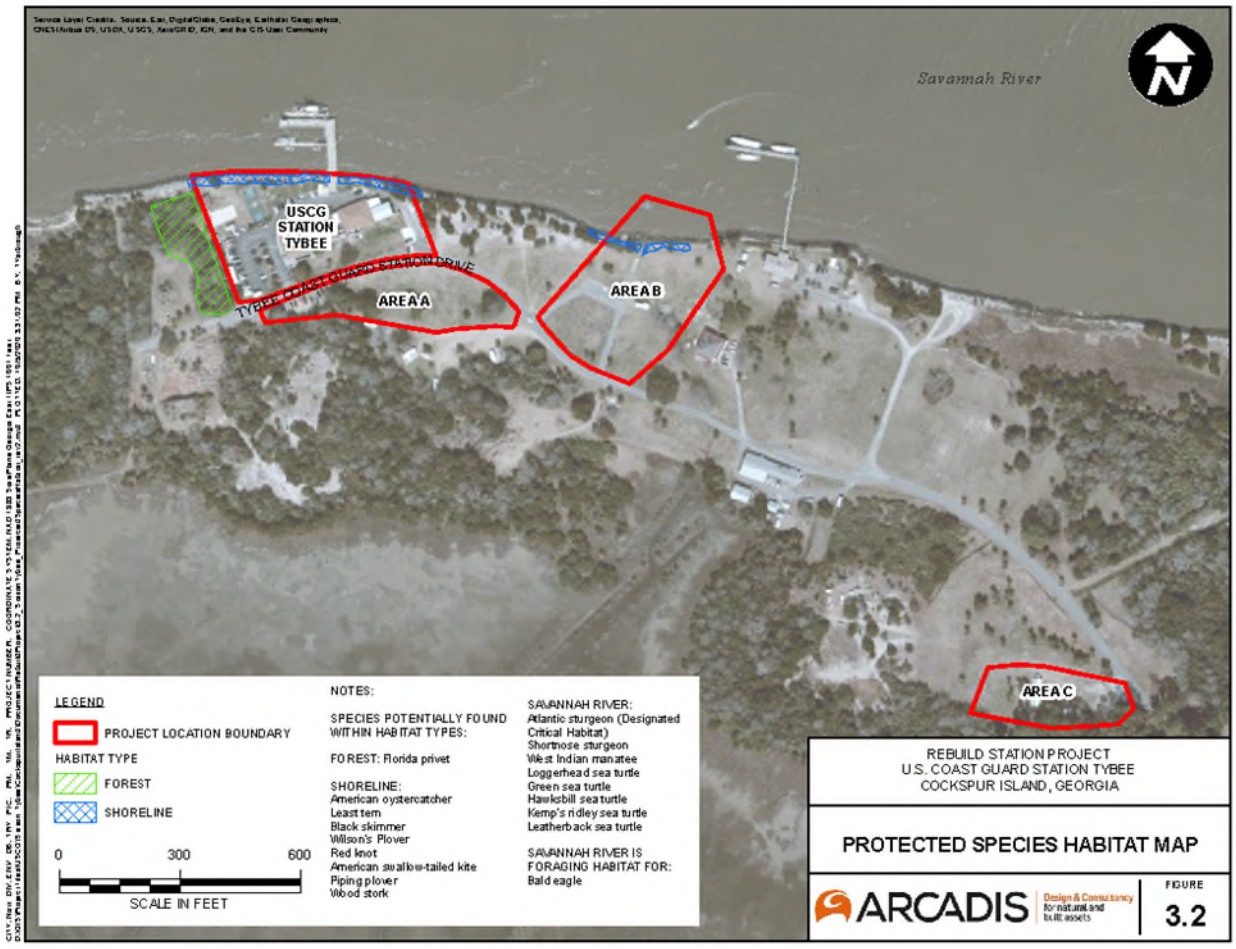

Figure 3.2: Protected Species Habitat Map

3.8.4.1 Federally Listed Species

Consultation with USFWS, which is included in **Appendix A**, and review of readily available data identified the following federally listed species.

West Indian Manatee

The West Indian manatee has been observed in the Savannah River estuary primarily during the months of April through October (Ecology & Environment 2010). Correspondence received from GADNR on July 28, 2020 indicates there are known occurrences of the West Indian manatee near the Action Area in the Savannah River (GADNR 2020b). Per the GADNR correspondence, manatees may also occur in the vicinity of the project location boundary during March through November if the water temperature is above 17 degrees Celsius. GADNR recommends that any in-water construction work be conducted during December through February to eliminate the risk to manatees. If construction must occur during March through November, the USACE includes in issued permits Standard Manatee Conditions for In-Water Work.

North Atlantic Right Whale

The North Atlantic right whale may be present in nearshore ocean waters during periods of migration and calving season. Sightings data indicate that the peak period of right whale occurrence in the vicinity of the Savannah River is December through March. Additionally, nearshore ocean waters seaward of the Savannah River mouth at the COLREGS line (i.e., seaward of the U.S. collision regulation boundary, which is the line of demarcation that delineates those waters upon which mariners will comply with the International Regulations for Preventing Collisions at Sea, 1972 and the waters upon which mariners will comply with the Inland Navigation Rules) are designated as calving Critical Habitat for the North Atlantic right whale (Ecology & Environment 2010). Although potentially present in nearshore waters, right whales are not expected to enter the relatively shallow waters of the Savannah River Estuary.

Green Sea Turtle

Green sea turtles live in estuarine and marine coastal and marine waters. They are generally found in fairly shallow waters inside reefs, bays, and inlets. Juveniles can be found in coastal bays, inlets, lagoons, and offshore warm reefs. Large juveniles and adults feed on sea grasses and algae (NOAA Fisheries Service 2005a). Green turtles come ashore at beaches from June to July to nest. Nesting occurs at night on the upper beach and sand dunes. Hatchlings emerge and head toward sea approximately 60 days later from August through November. Green turtles are considered infrequent nesters in Georgia. Juvenile green sea turtles may occur in the Savannah River estuary and/or in nearshore marine waters during the months of April through December. While green sea turtles nest on Tybee Island, there is no suitable nesting or critical habitat within the Action Area.

Hawksbill Sea Turtle

Hawksbill sea turtles use various marine habitats at different stages of their life cycle but are most commonly associated with healthy coral reefs. This species is strongly associated with coral reef and hard bottom habitats. Within the continental U.S., nesting is restricted to the southeast coast of Florida and the Florida Keys, but nesting is rare in these areas (NOAA Fisheries Service 2005b). The hawksbill sea turtle may occur in nearshore marine waters during the warmer months but is unlikely to enter the Savannah River estuary. As the preferred coral reef and hard bottom habitats are not located near the Action Area, this species is unlikely to be found near the Action Area.

Leatherback Sea Turtle

Leatherback sea turtles are a pelagic species of deep, offshore waters. This species is the most migratory and wide-ranging of sea turtle species and feeds primarily on jellyfish. The U.S. Caribbean, primarily Puerto Rico and the U.S. Virgin Islands, and southeast Florida support small nesting colonies, but represent the most significant nesting activity within the U.S. (NOAA Fisheries Service 2005c). As this species prefers deep, offshore waters, it is not anticipated that leatherback sea turtles would occur in the estuarine waters near the Action Area.

Loggerhead Sea Turtle

Loggerhead turtles occupy three different ecosystems during their lives: the terrestrial zone (as hatchlings), the oceanic zone (as post-hatchlings and juveniles), and the neritic (i.e., nearshore) zone (as older juveniles and adults). The predominant foraging areas for western North Atlantic adult loggerheads are found throughout the relatively shallow continental shelf waters of the U.S., Bahamas, Cuba, and the Yucatán Peninsula of Mexico. In the southeastern U.S., about 80 percent of nesting occurs in six Florida counties. As post-hatchlings, loggerheads are often found in floating algal mats called Sargassum. (NOAA Fisheries Service 2005d). Juvenile loggerhead sea turtles may occur in the Savannah River estuary and/or in nearshore marine waters during the months of April through December. Loggerhead sea turtles are documented to nest on Tybee Island and nearshore marine waters along the Tybee Island oceanfront beach from the mean high-water (MHW) line to 1.6 kilometers offshore are designated as reproductive Critical Habitat for the loggerhead sea turtle (Ecology & Environment 2010). In addition, correspondence received from GADNR on July 28, 2020 indicates there are known occurrences of the loggerhead sea turtle approximately 2.6 miles east of the Action Area (GADNR 2020b).

Kemp’s Ridley Sea Turtle

Kemp's ridley sea turtles are distributed throughout the Gulf of Mexico and U.S. Atlantic seaboard from Florida to New England. Most Kemp's ridley sea turtles nest on a single stretch of beach on the Gulf coast of Mexico. Occasional nesting has been documented in North Carolina, South Carolina, and the Gulf and Atlantic coasts of Florida (NOAA Fisheries Service 2005e). Juvenile Kemp’s ridley sea turtles may occur in the Savannah River estuary and/or in nearshore marine waters during the months of April through December. No suitable nesting habitat for the Kemp’s ridley sea turtle exists near the Action Area.

Atlantic Sturgeon

Atlantic sturgeon live in offshore, brackish waters and migrate to fresh water in the spring to spawn (USFWS 2011). Adult and/or juvenile Atlantic sturgeon may occur in the lowermost reach of the Savannah River estuary during various times of the year. Additionally, the Savannah River from River Mile 0 up to the New Savannah Bluff Lock and Dam is designated as Critical Habitat for the Atlantic sturgeon. Correspondence received from GADNR on July 28, 2020 indicates there are known occurrences of the Atlantic sturgeon approximately 9.8 miles west of the Action Area in the Savannah River.

Shortnose Sturgeon

The shortnose sturgeon is the smallest of the three sturgeon species that occur in eastern North America, having a maximum known total length of 4.7 feet and weight of about 50 pounds. The shortnose sturgeon is anadromous, living mainly in the slower moving riverine waters or nearshore marine waters,

and migrating periodically into faster moving fresh water areas to spawn. Shortnose sturgeon occur in most major river systems along the eastern seaboard of the U.S., and in Georgia, they occur in the Savannah River and within the Savannah River National Wildlife Refuge. Shortnose sturgeon spawning occurs in early February to mid-March in the Savannah River (NOAA Fisheries Service 2010). As shortnose sturgeon are known to occur and spawn in the Savannah River, suitable breeding habitat may be present near the project location boundary. Correspondence received from GADNR on July 28, 2020 indicates there are known occurrences of the shortnose sturgeon approximately 1.6 miles northwest of the Action Area in the Savannah River (GADNR 2020b).

Piping Plover

Piping plover is a winter visitor to the shores and spoil areas on Cockspur Island. As coastal development reduces wintering habitat, these spoil habitats grow in importance. The north end of Tybee Island at the mouth of the Savannah River is designated as Critical Habitat for this species (Ecology & Environment 2010). Additionally, the IRMA Portal NPSpecies database indicates that this species is found within Fort Pulaski. Piping plovers may breed on Cockspur Island, and suitable breeding habitat may be present near the Action Area (NPS 2020). During the terrestrial field survey, shoreline habitat area near the Station and within Area B was determined to be suitable foraging habitat for listed bird species. As a result, piping plover may be present on a transient basis at or near the Action Area.

Red Knot

Red knot utilize tidal flats and shores during migration and winter along coastal mudflats and tidal zones, sometimes utilizing sandy beaches. This species relies on horseshoe crab eggs and overharvesting of horseshoe crabs along the central Atlantic Coast has led to a sharp reduction in the food source for this species. Red knot nest on the Arctic tundra, usually on high and barren areas inland from the coast and near a pond or stream (Audubon Undated-b). The IRMA Portal NPSpecies database indicates that this species is found within Fort Pulaski (NPS 2020). During the terrestrial field survey, shoreline habitat area near the Station and within Area B was determined to be suitable foraging habitat for listed bird species. As a result, red knot may be present on a transient basis at or near the Action Area.

Wood Stork

The wood stork is the only true stork (family *Ciconiidae*) that regularly occurs in the U.S. Wood storks breed in Georgia, Florida, and South Carolina, with colonies having been documented in 13 counties along the coast and across southern Georgia (Ecology & Environment 2010). The IRMA Portal NPSpecies database indicates that this species is found within Fort Pulaski and is a regular summer visitor near Cockspur Island (NPS 2020). During the terrestrial field survey, shoreline habitat area near the Station and within Area B was determined to be suitable foraging habitat for listed bird species. As a result, wood stork may be present on a transient basis at or near the Action Area.

Eastern Black Rail

The eastern black rail was listed under the ESA as threatened in November 2020 and is included in this EA based on USFWS' recommendation in correspondence dated February 3, 2021 (see **Appendix A**). This subspecies of black rail is a small, secretive marsh bird with a broad distribution that encompasses both tidal and freshwater marshes across several states, including Georgia. In tidal marshes, it typically inhabits the border between the wetland and upland edges, as well as higher elevations dominated by salt marsh grass (*Spartina alterniflora*) and needlerush (*Juncus roemerianus*). During the July 2020

terrestrial field survey, shoreline habitat at the south of the Station was determined to contain suitable foraging habitat for listed bird species, including the eastern black rail. However, the small pockets of salt marsh grass located among the existing riprap within the proposed work zones do not provide the dense cover that the birds seek for protection from predators. The USFWS noted in its February 3, 2021 letter that their desktop review of imagery of the project site indicates that the upland to aquatic interface is armored with no tidal marsh present, a condition which was confirmed in the field during a July 2020 survey. As a result, the eastern black rail may be present on a transient basis at or near the Action Area.

Bald Eagle (under the Bald and Golden Eagle Protection Act)

The bald eagle is an uncommon winter visitor to the area. However, the number of eagles nesting in Georgia continues to grow, surpassing 100 occupied nest territories in 2007 and more than 200 nest territories in 2015. A record of 218 nests was documented during a 2017 survey (GADNR Undated-b). Though no known bald eagle nests are located at or near the Action Area, correspondence received from GADNR on July 28, 2020 indicates there are known occurrences of bald eagle approximately 1.2 miles west of the Action Area, and the IRMA Portal NPSpecies database indicates that this species is found within Fort Pulaski (GADNR 2020b; NPS 2020). It is likely that bald eagles use the surrounding waters for foraging and during the terrestrial field survey, shoreline habitat area near the Station and within Area B was determined to be suitable foraging habitat for listed bird species. As a result, bald eagle may be present on a transient basis at or near the Action Area.

3.8.4.2 State Listed Species

As previously discussed, USCG will work to comply with state listed species regulations to the maximum extent practicable. Identified state listed species include the following birds – American oystercatcher, American swallow-tailed kite, black skimmer, least tern, red knot, and Wilson's plover – as well as the native Florida privet shrub. Based on the July 2020 terrestrial field survey, the listed bird species may be present on a transient basis at or near the Action Area, as a result of suitable foraging habitat at Area B and the Station shoreline.

3.8.5 Essential Fish Habitat

The NOAA NMFS regulates marine fisheries with Essential Fish Habitat (EFH) protected under the Magnuson-Stevens Fishery Conservation and Management Act. EFH is defined under the Magnuson-Stevens Fishery Conservation and Management Act as "those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity".

The unconsolidated estuarine bottom and estuarine water column in the project location boundary are designated EFH and Habitat Areas of Particular Concern (HAPCs) in Fishery Management Plans developed by the South Atlantic Fishery Management Council and the Mid-Atlantic Fishery Management Council under the Magnuson-Stevens Fishery Conservation and Management Act. EFH and HAPC that occur in the vicinity of the Action Area are summarized in **Table 3-7**.

Table 3-7: EFH and HAPC Near USCG Station Tybee

EFH/HAPC	Fisheries Management Plan (s)	Management Authority
EFH		
Subtidal/intertidal non-vegetated flats	Penaeid shrimp (brown, white, and pink shrimp)	South Atlantic Fisheries Management Council
Unconsolidated bottom	Snapper-Grouper complex	South Atlantic Fisheries Management Council
Coastal inlets	Coastal migratory pelagics	South Atlantic Fisheries Management Council
Oyster Reefs and Shell Banks	Snapper-Grouper complex	South Atlantic Fisheries Management Council
Estuarine Emergent Wetlands (Intertidal Marshes)	Penaeid shrimp, Snapper-Grouper complex	South Atlantic Fisheries Management Council
Estuaries	Bluefish, summer flounder	Mid-Atlantic Fisheries Council
HAPC		
Coastal inlets	Penaeid shrimp, snapper-grouper, coastal migratory pelagics	South Atlantic Fisheries Management Council
Oyster Reefs and Shell Banks	Snapper-Grouper complex	South Atlantic Fisheries Management Council

3.9 Water Resources

USCG Station Tybee at Cockspur Island is located at the mouth of the Savannah River estuary and is protected from Atlantic Ocean wave action by Tybee Island. The outflow from the Savannah River forms a salt wedge estuary, with fresh water from upstream floating over the top of denser, salty water that enters from the ocean (Brush et al. 2004). The estuary is unique, as it has both man-made dredge spoil islands and natural biological communities such as tidal marshes, seagrass meadows, and oyster bars.

Desktop studies were conducted to obtain data from regulatory agency websites, including the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer and the USFWS National Wetlands Inventory Wetlands Mapper. A site visit was conducted on July 17, 2020 to delineate potential Waters of the U.S. (WOTUS) along the shoreline of Station Tybee and at the existing NPS boat ramp. Wetlands and streams were delineated in accordance with the following:

- 1987 USACE Wetland Delineation Manual (USACE 1987)
- 2010 Regional Supplement to the USACE Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (USACE 2010)
- 2016 National Park Service Procedural Manual #77-1: Wetland Protection (NPS 2016)

Information obtained from websites and the wetland delineation is discussed in the sections below.

3.9.1 Surface Waters

The CWA requires that each state's surface waters be designated for their use. As per Rule 391-3-6-.03, surface waters in the State of Georgia have been classified according to their designated use into one of the following six classes:

a) Drinking Water Supplies

b) Recreation

c) Fishing, Propagation of Fish, Shellfish, Game, and Other Aquatic Life

d) Wild River

e) Scenic River

f) Coastal Fishing.

Per Georgia Rule 391-3-6-.03 Water Use Classifications and Water Quality Standards, water quality criteria have been established for each classification to protect present and future most beneficial uses of the waters. These criteria are intended to protect aquatic life and human health. The Savannah River in the vicinity of the USCG Station Tybee are in Class (b) and (f) waters.

Potential impacts to water quality on Cockspur Island are regulated by NPS policies and the CWA. Station Tybee would follow the NPS Management Policies 2006 § 4.6.3, which states that the NPS will take all necessary actions to maintain or restore the quality of surface water and groundwater within the parks consistent with the CWA and all other applicable federal, state, and local laws and regulations.

Surface water resources influencing water quality at Fort Pulaski include the Atlantic Ocean, the Savannah River, several tidal creeks, and salt marshes. Main contributors to the reduction of water quality within the Savannah River and nearby estuaries are both point and non-point sources of pollutants from industrial facilities and stormwater runoff generated during the use of roadways, parking lots, bridges, and yards.

Station Tybee is located on the north channel of the Savannah River, which is part of the Savannah River estuary and the Atlantic Ocean. The Savannah Harbor from Fort Pulaski (River Mile 0) to Seaboard Coastline R/R Bridge (River Mile 27.4) is identified on the State of Georgia's Section 303(d) list as impaired for dissolved oxygen. The coastline in the Savannah area is classified as a mesotidal region (tidal ranges between 6 and 12 feet) (GPA 1998). Tidal fluctuations near the project location boundary are semidiurnal, averaging 6.8 feet at the mouth of the Savannah Harbor and 7.9 feet at the upstream limit of the Harbor.

During the WOTUS delineation, the MHW line of the Savannah River was delineated along the northern side of Cockspur Island within the project location boundary (see **Figure 3.3**). The shoreline along this area is stabilized with riprap. Although small amounts of marsh vegetation were observed, this area is considered a tidal stream boundary where sediment accumulation within the riprap allows minimal vegetation to establish. There were no other jurisdictional streams or surface waters found within the project location boundary.

As authorized by the CWA, the NPDES permit program controls water pollution by regulating water sources (including stormwater) that discharge pollutants into WOTUS. Although the USEPA has jurisdiction over the NPDES permit program, it has ceded jurisdiction to many authorized states. In Georgia, the GADNR EPD has jurisdiction over NPDES permitting in the state. Under this program, if more than 1 acre of land is disturbed during construction, the action must be permitted under the General NPDES Permit for Stormwater Discharges Associated with Construction Activity. As part of this permit, the applicant must prepare a stormwater pollution prevention plan that describes mitigation measures to be implemented, including erosion and sedimentation controls, during construction. During operations,

industrial facilities, including military facilities, must comply with the NPDES permit program for all point source discharges of stormwater associated with industrial activities.

Figure 3.3: Waters of the U.S.

3.9.2 Groundwater

The principal source of fresh water for public use (e.g., drinking water) at USCG Station Tybee and the rest of Chatham County is the Upper Floridan aquifer (Clarke et al. 1990). Secondary sources of groundwater in Chatham County are not widely used for public supply. The Lower Floridan aquifer is rarely used, except for a few municipal and industrial wells, because it is deeply buried (Clarke et al. 1990). The Upper Brunswick aquifer, which is located above the Upper Floridian aquifer, is approximately 88 feet below the surface and about 20 feet thick at Fort Pulaski. The surficial aquifer lies above the Upper Brunswick aquifer (Clarke et al. 1990; GPA 2002). It ranges in depth from 10 to 90 feet below the surface and is about 65 feet thick nearest Fort Pulaski (Clarke et al. 1990; GPA 2002). Recharge to the surficial aquifer occurs by local rainfall. Groundwater in the surficial aquifer moves

laterally to streams and rivers and, consequently, has a very low water yield due to a low hydraulic gradient (GPA 2002).

Groundwater is located approximately 6 to 9 feet below the surface in the vicinity of the project location boundary.

3.9.3 Wetlands

Per Section 404 of the CWA, the USACE regulates WOTUS including wetlands that have a hydrologic connection to a traditional navigable water. Any project that will impact a wetland under USACE jurisdiction must obtain a permit from the USACE before implementation. The Georgia Legislature passed the Marshlands Protection Act in 1970, also requiring a GADNR permit to alter wetlands. Although USCG, as a federal agency, is not obligated to pursue a GADNR wetland permit, the USCG aims to uphold state wetland protections to the maximum extent practicable. Additionally, EO 11990, Protection of Wetlands, requires federal agencies conducting certain activities to avoid, to the extent possible, the adverse impacts associated with the destruction or loss of wetlands and to avoid new construction in wetlands if a practicable alternative exists. NPS Director's Order #77-1 states that, for new actions where impacts to wetlands cannot be avoided, proposals must include plans for compensatory mitigation that restores wetlands on NPS lands, where possible, at a minimum acreage ratio of 1:1. Consistent with EO 11990 and Director's Order #77-1: Wetland Protection, the NPS adopted a goal of "no net loss" of wetlands.

According to the USFWS National Wetlands Inventory Wetlands Mapper, there are no federally mapped tidal or fresh water wetlands present within the project location boundary (USFWS 2020b). During the site visit to delineate WOTUS, there were no jurisdictional tidal or fresh water wetlands identified within the project location boundary. There were tidal marshes observed south of Area C, located outside of the project location boundary.

3.9.4 Floodplains

EO 11988, Floodplain Management, issued May 24, 1977, directs all federal agencies to avoid both long- and short-term adverse impacts associated with occupancy, modification, and development in the 100-year floodplain when possible. Floodplains are defined by FEMA in this order as the lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a 1 percent or greater chance of flooding in any given year (also referred to as the 100-year floodplain).

Flooding in the 100-year floodplain is expected to occur once every 100 years on average. All federal agencies are required to avoid building in a 100-year floodplain unless no other practical alternative exists. The USCG would follow NPS adopted guidelines pursuant to EO 11998 stating that NPS policy is to restore and preserve natural floodplain values and avoid environmental impacts associated with the occupation and modification of floodplains. The guidelines also require that, where a practicable alternative exists, a Class I action should be avoided within a 100-year floodplain. Class I actions include the location or construction of administration, residential, warehouse, and maintenance buildings; non-excepted parking lots; or other man-made features that by their nature entice or require individuals to occupy the site.

Most of the project location boundary is located within the 100-year floodplain, which has been mapped by FEMA on the National Flood Hazard Layer viewer as a coastal high hazard area (Zone VE) at elevation 12. Zone VE is described as the 100-year floodplain with wave effects of 3 feet or greater. One portion of the project location boundary, which includes part of the Station, is not mapped within the 100-year floodplain, but is located within the 500-year floodplain (FEMA 2020). See **Figure 3.4** for the location of the 100-year floodplain.

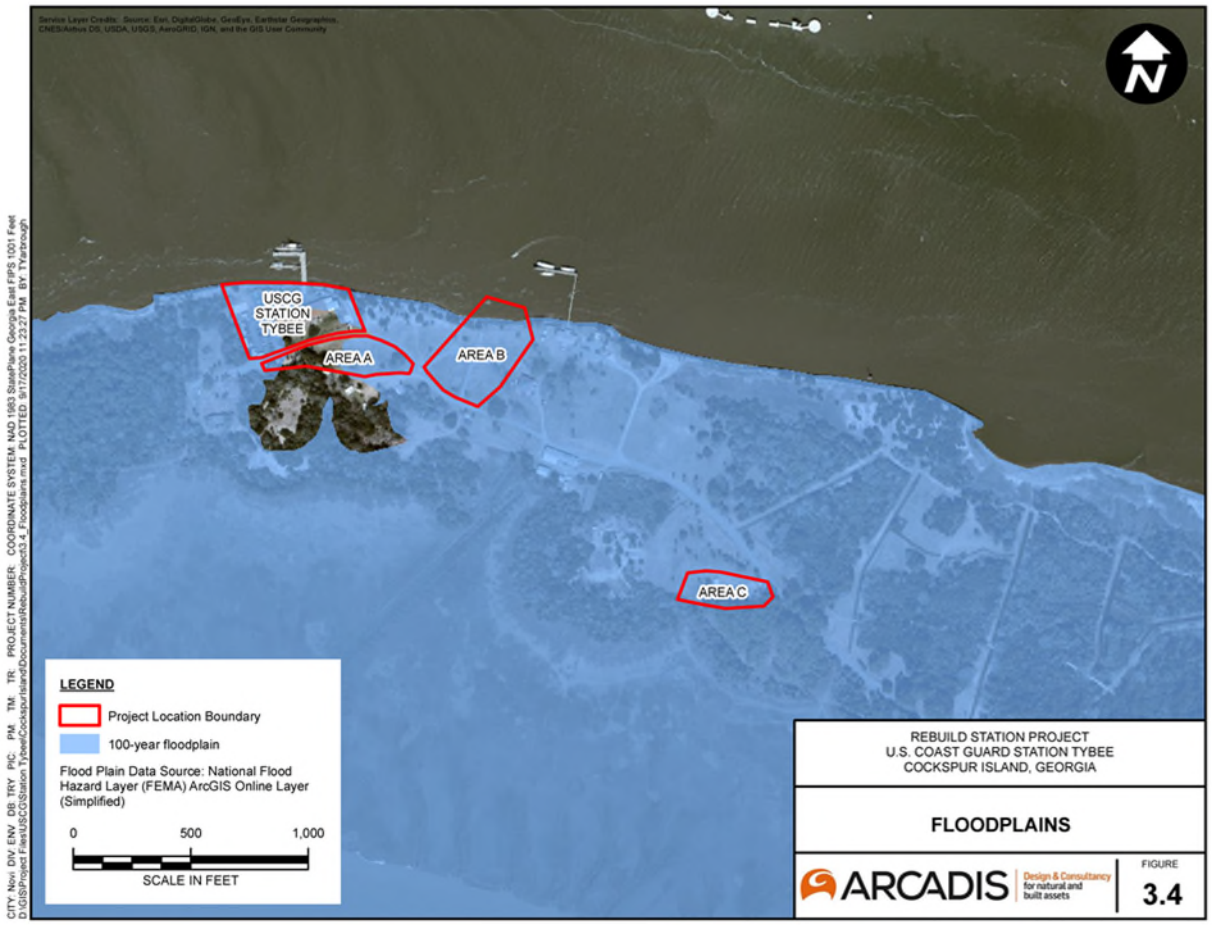

Figure 3.4: Floodplains

3.9.5 Coastal Policies and Resources

The Coastal Zone Management Act encourages states with coastal jurisdiction to develop and implement comprehensive management programs to balance resource protection with development in the coastal zone. Management programs developed by a coastal state that are approved by NOAA are authorized to review certain federal activities within the coastal zone for consistency with a coastal management program (CMP). Termed "federal consistency," states with an approved CMP are granted authority to review:

- Activities conducted by or on behalf of a federal government agency
- Federal licenses or permits

- Permits issued under the Outer Continental Shelf Lands Act for offshore minerals exploration or development
- Federally funded activities

The State of Georgia implemented the Georgia Coastal Management Program to balance economic development with preservation of coastal resources. The CMP is administered by GADNR Coastal Resources Division under the Georgia Coastal Management Act (OCGA 12-5-320, et seq.). The CMP uses existing state resource laws and establishes a network among agencies with management authority in the 11-county coastal service area. This provides a mechanism by which to coordinate activities and allows for the State to participate in the National Coastal Zone Management Program. The following Georgia counties are considered within the coastal zone: Brantley, Bryan, Camden, Charlton, Chatham, Effingham, Glynn, Liberty, Long, McIntosh, and Wayne.

Coastal resources regulated under the enforceable policies of the state CMP (including significant fish species and habitat; threatened wildlife habitats; fresh water aquifers; and historical, cultural, and archeological sites) occur both within and near the project area. **Table 3-8** summarizes the identified enforceable coastal policies and associated coastal resources.

Table 3-8: Applicable Coastal Policies for Resources Identified

Coastal Policy	Resource and Location	Description
Coastal Marshlands Protection Act – O.C.G.A. 12-5-280, et seq;	Significant fish species/habitat in /Savannah River	Critical habitat for Atlantic sturgeon/suitable habitat for other listed species (See **Section 3.8.4**)
Erosion and Sedimentation Act, OCGA 12-7-1	Surface waters, Savannah River	Includes 25-foot vegetative buffer from surface waters
Endangered Wildlife Act – O.C.G.A. 27-3-130	Threatened wildlife habitats; Shoreline of Station Compound; Area B; Savannah River	Includes foraging habitat for listed bird species (See **Section 3.8.4**)
Georgia Water Quality Control Act – O.C.G.A. 12-5-20	Fresh water aquifers across project area	Upper Floridian Aquifer – Principal public water source for Station compound and rest of Chatham County
Historic Areas – O.C.G.A. 12-3-50	Historical/cultural/archeological sites across project area; Additional resources in close proximity	Fort Pulaski; WWII Naval Base remains; Cockspur Lighthouse; Archeological sites (See **Section 3.10**)

3.10 Cultural Resources

3.10.1 Overview

The NHPA, as amended, is the basic federal law protecting historic and cultural resources. The NHPA defines such resources as "any prehistoric or historic district, site, building, structure, or object" (36 CFR 800) with known or potential historic, architectural, archaeological, cultural, or scientific importance. Pursuant to the NHPA, federal agency historic preservation programs identify, evaluate, and nominate historic and cultural resources under their jurisdiction for listing in the NRHP. The NHPA as amended, outlines federal policy to protect historic properties and promote historic preservation in cooperation with states, tribal governments, local governments, the public, and other consulting parties. Section 106 of the NHPA outlines the procedures that federal agencies follow to consider the effect of their actions on historic properties. Under Section 106, federal agencies must consider the effect an undertaking may have on historic properties, defined as those properties that are listed in or eligible for listing in the NRHP. As part of the Section 106 process, agencies are required to consult with the State Historic Preservation Office (SHPO) and federally recognized Native American Tribes to identify historic properties within the Area of Potential Effect (APE). The Section 106 review process must be completed before approval of the expenditure of federal funds on the undertaking or before the issuance of any federal license or permit.

3.10.2 Area of Potential Effect

The APE, as defined in the NHPA, accounts for the full extent and range of potential impacts on historic and cultural resources that could occur on or in the vicinity of the undertaking, as defined under the NHPA. APEs are determined by the scale and nature of an undertaking and its potential effects on the resource(s) from ground disturbance to visual or audible effects in the surrounding landscape. The APE for the Proposed Action is shown on Figure 3.5. Consultation with the SHPO or THPO confirms that an appropriate APE is defined as a baseline for analysis of the potential effects of an undertaking.

The aboveground (architectural) APE for the Proposed Action includes the limits of Station Tybee and portions of Fort Pulaski to the east; namely, the historic Park Headquarters, from which there are partial views of the Station (see **Figure 3.5**). Due to intervening topography and trees, there are minimal views of the Station from beyond this point and no views of the Station from the historic Fort Pulaski.

The archaeological APE is the limits of ground disturbance resulting from proposed demolition and construction. This includes Station Tybee and Areas A, B, and C identified on **Figure 1.2**. Access and laydown areas would be contained within the limits of these areas and, to the maximum extent practicable, to existing gravel and paved surfaces. The proposed removal of the temporary trailers at Station Tybee would not require any ground disturbance. Consultation with the Georgia SHPO and consulting parties was initiated by the USCG on August 25, 2020. A response from the SHPO was received on December 11, 2020. Section 106 correspondence is included in **Appendix B**. Results of the consultation to date with the SHPO on effects under Section 106 are included in Section 4.11.

Figure 3.5 Area of Potential Effect – Aboveground

Figure 3.6: Looking west toward Station Tybee (in right background) from Park Headquarters

3.10.3 Archaeological Resources

Fort Pulaski National Monument and portions of the project area have been the subject of several NPS archaeological investigations. These include a 2011 survey that overlaps Project Areas B and C and a 2015 investigation at the USCG Station that also includes a part of Project Area A. Fort Pulaski as a whole was the subject of a 2000 archaeological assessment (Panamerican 2020). Shovel test surveys were conducted across the entirety of the project area for the Station improvements and in parts of Project Areas A and C. NPS also conducted a ground-penetrating radar investigation that included the southern portion of Project Area B. None of the shovel test surveys identified any cultural resources. The ground-penetrating radar survey identified five anomalies for which the investigation's report recommended additional study. The report also recommended further work at the locations of buildings shown on 1940s and 1950s NPS plans, at which no anomalies were noted during the ground-penetrating radar investigation (McNeil 2011). None of the NPS surveys included testing for former ground surfaces that are buried deeper than would be detectable with a shovel test (i.e., approximately 3 feet). In addition to the previous NPS studies, the Southeast Archeological Center recently conducted an investigation at Area B with the results pending.

3.10.4 Historic Resources

Fort Pulaski is a National Monument and was listed in the NRHP in 1975 under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) and Criterion C (embodies distinctive characteristics of a type, period, or method of construction; represents the work of a master; or possesses high artistic values). President Calvin Coolidge declared Fort Pulaski and its defining earthworks a national monument on October 24, 1924 (NPS). Fort Pulaski National Monument preserves a striking masonry fortification (Fort Pulaski) significant in American military history. At Fort Pulaski, there are 23 historic structures that include the fort, the fort moat, dikes, cisterns, various ruins, Battery Horace Hambright, and the Cockspur Island Lighthouse, all of which are located beyond the APE. The contributing resources listed in the nomination include archeological, structural, and landscape features dating to several periods and themes. In addition to the contributing resources listed in 1975, several significant landscape resources, primarily vegetation, are managed by the NPS. Fort Pulaski, in part, and Station Tybee are located within what the National Park Service identifies as the Cockspur Island Historic District (NPS 2011). The District is not listed by name as a historic district on the NRHP.

There are three aboveground features in the APE that are of historic age (i.e. more than 50 years old): the 1950s boat ramp in Area B, the Park Headquarters, and the 1943 well head in Area C. The NPS recently reviewed the boat ramp for a determination of eligibility and concluded the following: "The administrative boat ramp does not contribute to the National Register District, even assuming an expanded period of significance to include the Navy period, as its construction post-dates this period. Additionally, the boat ramp is not significant under any of the National Register Criteria." NPS has also determined that the well head structure is not eligible for listing to the NRHP due to a lack of integrity. As part of consultation under Section 106 of the NHPA, the Georgia SHPO concurred that the circa 1943 well head and circa 1950 NPS boat ramp are non-contributing to the Fort Pulaski National Monument, due to a lack of integrity, significance, and association (see **Appendix B**).

The current Park Headquarters is in a former Quarantine Officer's Residence and is adjacent Area B. The building is documented in a 2004 Historic Structures Report and is a contributing structure at the National Monument (Panamerican 2020). The NPS Park Headquarters and the NPS Maintenance Complex, dating back to the Civilian Conservation Corps Era, are listed in the Fort Pulaski National Monument Cultural Landscape Report and contribute to the cultural landscape (NPS 2011).

4 ENVIRONMENTAL CONSEQUENCES

This section describes the potential environmental consequences to the resources identified in Section 3 from the implementation of the Proposed Action and alternatives including the No Action alternative.

4.1 Land Use

For Land Use and Zoning, the region of influence is defined as the Station Tybee compound and Areas A, B, and C, as well as adjacent parts of Fort Pulaski, where land use consistency is of concern.

4.1.1 Environmental Criteria

The Proposed Action and alternatives would be considered to have a significant impact on land use if:

- It is inconsistent with existing land use plans or policies.
- It eliminates the viability of existing land use.
- Surrounding land use would be expected to change substantially in the short or long term.
- It conflicts with adjacent land use to the extent that public health or safety is threatened.
- It is incompatible with planning criteria that ensure the safety and protection of human life and property.

The USCG must adhere to land use constraints stated in the IAA and summarized in Section 3.2.

4.1.2 Impacts from Alternative 1: Rebuild Option 1

Implementation of Alternative 1 would not be inconsistent with existing land use plans or policies, would not eliminate the viability of existing land use within Fort Pulaski or elsewhere, would not change surrounding land use in the short or long term, would not conflict with adjacent land use to the extent that public health or safety is threatened, and is compatible with criteria that ensure safety and protection of human life and property. Alternative 1 would not result in changes to existing land use (e.g. recreation, marshland, conservation, civic/institutional) in the region of influence. Additionally, Alternative 1 would be consistent with the IAA between the USCG and NPS, as it would achieve resiliency requirements within the smallest practical footprint. The project would entail close coordination with NPS to ensure consistency with the IAA, as well as further agency coordination to ensure proper protection of nearby historic resources. As such, no significant adverse impacts to land use is expected from Rebuild Option 1.

4.1.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Implementation of Alternative 2 would not be inconsistent with existing land use plans or policies, would not eliminate the viability of existing land use within Fort Pulaski or elsewhere, would not change surrounding land use in the short or long term, would not conflict with adjacent land use to the extent that public health or safety is threatened, and is compatible with criteria that ensure safety and protection of human life and property. Alternative 2 would not result in changes to existing land use (e.g. recreation,

marshland, conservation, civic/institutional) in the region of influence. Additionally, Alternative 2 would be consistent with the IAA between the USCG and NPS, as it would facilitate resiliency improvements in a manner permitted by the existing IAA, and any amendments (if found necessary) could be accomplished using established procedures with mutual consent from the USCG and NPS. In general, proposed actions would entail close coordination with NPS (to ensure consistency with land use policies, preservation of ongoing operations, and other elements), as well as further agency coordination to ensure proper protection of nearby historic resources.

It is possible that minor impacts to land use in the immediate project vicinity would result from changes to the existing wastewater treatment system under Upgrade Option 3 (Modification to a Community System) or Upgrade Option 4 (Installation of an Alternative Treatment System), as these options would involve dedicating additional land to wastewater treatment through, for example, establishment of a larger absorption field. However, as discussed under Section 2.2.1, Option 2: Modification to a Mound System was recommended and would entail improvements within the smallest practical footprint within Area A, which is already used by the NPS for wastewater treatment. Additional minor impacts could result from the proposed construction of a new, elevated pump house and emergency generator under Alternative 2, as part of upgrading the potable water system. The new pump house would be located near the southwest corner of the Area C Picnic Pavilion – an area that supports recreational use by Fort Pulaski visitors. It is anticipated, however, that the structure would be relatively distant from public activities and would not affect visitor use of the area, except during the construction period (due to noise, dust concerns, and other conditions associated with construction). Ultimately, the Picnic Pavilion would retain its function, with no significant adverse impacts expected.

4.1.4 Impacts from the No Action Alternative

Under the No Action Alternative, there would be no alteration of existing structures or uses at USCG Station Tybee or in Areas A, B and C. Therefore, there would be no impacts to land use in the area from actions such as construction, ground disturbance, building changes, or other associated activities.

4.2 Infrastructure and Utilities

For infrastructure, the region of influence is defined as Station Tybee and Fort Pulaski where alternatives are identified and the specific geographical location where the USCG facilities would be located in relation to Fort Pulaski. The threshold for significance for infrastructure is the adequacy of the existing facilities to meet Station Tybee operating requirements and/or the feasibility for improvements or new construction.

4.2.1 Environmental Criteria

The Proposed Action and alternatives would be considered to have a significant impact on infrastructure and utilities if:

- It impedes Station Tybee ability to meet operational requirements.
- It reduces water availability or supply to existing users.
- It overdrafts groundwater aquifers.
- It exceeds safe annual yield of water or energy supply sources.

4.2.2 Impacts from Alternative 1: Rebuild Option 1

Alternative 1 would involve the upgrade and/or replacement of existing facilities due to identified states of disrepair and deterioration. The actions proposed under Alternative 1 (e.g., demolition and replacement of key buildings) would result in some long-term benefits to infrastructure because new permanent structures would be constructed to replace existing structures in order to more effectively meet the operational needs and missions of Station Tybee.

New construction, including renovations and additions, would be subject to all energy efficiency requirements and sustainable building guidelines set forth in the Energy Policy Act of 2005, EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management and EO 13514, Federal Leadership in Environmental, Energy, and Economic Performance, October 2009. The USCG is also subject to COMDTINST 4100.2E, Energy Management Policy and COMDTINST M11000.7, Facilities Energy Manual. However, some operational issues – particularly those related to configuration of the space and vehicle flow – would remain if a boat ramp were to be located at the Station. Therefore, implementation of Alternative 1 would result in adverse but less than significant impacts to infrastructure.

Alternative 1 would improve existing utilities but would not replace the existing systems. It would not reduce water availability or supply to existing users, nor overdraft groundwater aquifers, nor exceed safe annual yield of water or energy supply sources. However, this alternative would also not minimize the impacts from flood waters with elevated salinity levels entering the well and groundwater. In addition, Alternative 1 would not allow for an increase in the wastewater treatment system capacity; therefore, it would not meet the maximum daily demands and would impede Station Tybee's ability to meet operational requirements for wastewater treatment into the future. As a result of these factors, implementation of Alternative 1 would result in adverse, but less than significant, impacts on existing wastewater utilities in the long term.

4.2.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Implementation of Alternative 2 would result in beneficial impacts in terms of energy efficiency and sustainable development, as all new construction and major renovations would comply with the principles stated in the above-referenced USCG guiding orders, instructions, and guidelines.

Alternative 2 would involve the upgrade and/or replacement of existing facilities that are in various states of disrepair and deterioration. The actions proposed under Alternative 2 (e.g., demolition and replacement of key buildings) would result in long-term benefits to infrastructure, as new permanent structures would be built in place of deteriorated buildings and trailers to meet the operational needs and missions of Station Tybee more effectively. This Alternative would also include improvements beyond the Station compound, namely expansion of the NPS boat ramp in Area B, which would address the needs related to the configuration of space, vehicle flow, and boat maintenance. Therefore, implementation of Alternative 2 would result in significant beneficial impacts to infrastructure in the long term.

Alternative 2 includes upgrading the wastewater treatment system, which would immediately address sewage demand without increasing the land footprint beyond that of the existing system. It will also protect the shallow groundwater from further contamination by pollutants by providing a functioning system that meets state requirements (PHE-BAKER JV, LLC 2020). Alternative 2 would also protect the

potable water supply from storm surges by elevating the pump house above historical flood water levels, installing an emergency generator as backup during power outages, and extending the well casing to prevent flood waters with elevated salinity levels from entering the groundwater. It would not reduce water availability or supply to existing users, nor overdraft groundwater aquifers, nor exceed safe annual yield of water or energy supply sources, nor impede Station Tybee's ability to meet operational requirements. Therefore, implementation of Alternative 2 would result in a beneficial but less-than significant impact to utilities.

4.2.4 Impacts from the No Action Alternative

The No Action Alternative would require Station Tybee personnel to operate in facilities that do not meet their operational needs. The proposed routine maintenance and repairs for Station Building 101 would not adequately extend its useful life, resulting in the need for continued repair and maintenance until it is structurally unsafe to use.

Under the No Action Alternative, the Station would also continue to operate with a wastewater treatment system that does not meet current demands, would not meet the Georgia Department of Public Health required 24-hour retention rate, and the potential for leaching into the shallow groundwater would increase (PHE-BAKER JV, LLC 2020). The No Action Alternative would result in adverse significant impacts on infrastructure and utilities.

4.3 Socioeconomic Environment

For socioeconomics and environmental justice, the region of influence is collectively defined as the Savannah-Chatham County area. Potential impacts to the socioeconomic environment and environmental justice were evaluated based on assessing the duration of the particular project activity, the magnitude of the particular impact, the type of impact (either adverse or beneficial), and whether the impact was directly or indirectly attributable to either project activities or the spatial footprint.

4.3.1 Environmental Criteria

Significant environmental impacts to the socioeconomic environment (e.g., local demographics, economy, housing) and environmental justice would occur if:

- The project would directly displace a residential population to the extent that the socioeconomic character of the area would be substantially altered.
- The project would directly displace a business that is unusually important because its products or services are uniquely dependent on its location or that serves a population uniquely dependent on its services.
- The project would result in substantial new development that is markedly different from existing uses, development, and activities within the area.
- The action would result in a substantially disproportionate share of adverse environmental or social impacts borne by minority or low-income populations.
- The action would affect the health, safety, social structure, or economic viability of an environmental justice population.

- Mitigation efforts could not eliminate substantially disproportionate impacts to minority or low-income populations.

4.3.2 Impacts from Alternative 1: Rebuild Option 1

Implementation of Alternative 1 would create a minimal, temporary, beneficial impact on the local economy. Short-term beneficial impacts would be associated with the construction, demolition, and renovation of facilities at Station Tybee. Estimated at 18 to 24 months, construction would provide temporary employment that would be beneficial, but would not have a significant, long term impact on the local economy (Ecology & Environment 2010).

Overall, Alternative 1 would not increase the number of USCG personnel assigned to Station Tybee. The Station currently includes temporary living quarters for personnel, and the MMB would include permanent living quarters, with no need for external housing. Implementation of Alternative 1 would also not involve the relocation of any USCG personnel or civilian support personnel, and the recapitalization of Station Tybee would not affect any existing jobs or housing within the local area. Pursuant to NEPA, Alternative 1 could not result in significant impacts, beneficial or adverse, to socioeconomic conditions in the long term.

In terms of environmental justice and E.O. 12898, Alternative 1 would not result in any identifiable adverse health impacts, and none of the impacts on the natural or physical environment would have a disproportionate impact on any minority or low-income population or community.

4.3.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Alternative 2 would create a minimal, temporary, beneficial impact on the local economy. Short-term beneficial impacts would be associated with the construction, demolition, and renovation of facilities at Station Tybee and in Areas A, B, and C of Fort Pulaski. Estimated at 18 to 24 months, construction would provide temporary employment that would be beneficial, but would not have a significant, short or long term impact on the local economy (Ecology & Environment 2010).

Overall, Alternative 2 would not increase the number of USCG personnel assigned to Station Tybee. The Station currently includes temporary living quarters for personnel, and, as with Alternative 1, the MMB would include permanent living quarters, with no need for external housing. Implementation of Alternative 2 would also not involve the relocation of any USCG personnel or civilian support personnel, and the recapitalization of Station Tybee under this Alternative would not affect any existing jobs or housing within the local area. Therefore, it is not expected that implementation of Alternative 2 would result in any significant impacts, beneficial or adverse, to long-term socioeconomic conditions.

Alternative 2 would not result in any identifiable adverse health impacts, and none of the impacts on the natural or physical environment under Alternative 2 would have a disproportionate impact on any minority or low-income population or community. Pursuant to E.O. 12898, the proposed action would not result in any disproportionately high and adverse human health or environmental effects on minority populations or low-income populations.

4.3.4 Impacts from the No Action Alternative

Under the No Action Alternative, there would be no change in population, demographics, or housing, as with implementation of Alternatives 1 and 2; however, the short-term beneficial impacts to the local economy from purchases of equipment, supplies, and other procurement and temporary employment of construction workers would not occur. Therefore, impacts to socioeconomics would be less than significant in the short term. Furthermore, pursuant to NEPA, the No Action Alternative would not result in any significant impacts, beneficial or adverse, to long-term socioeconomic conditions, and pursuant to E.O. 12898 would not result in any disproportionately high and adverse human health or environmental effects on minority populations or low-income populations.

4.4 Recreational Facilities

For recreational facilities, the region of influence consists of the Station Tybee compound and Areas A, B, and C, as well as immediately adjacent areas that serve a recreational use.

4.4.1 Environmental Criteria

The Proposed Action and alternatives would be considered to result in a significant impact to recreational facilities if:

- It causes the loss or significant degradation of existing recreational uses or renders an existing recreational facility unusable for its intended function.
- It precludes the development of future recreational uses in an area that supports or is designated for recreation.

4.4.2 Impacts from Alternative 1: Rebuild Option 1

Implementation of Alternative 1 could result in a minimal, short-term, and indirect adverse – but less than significant – impact to users of the camp sites within Area A, depending on the period of construction. If construction work occurs during the warmer months, there would be an indirect, adverse but less than significant impact to occupants of the camp site, which are as close as 140 feet to Station Tybee, from increased traffic and noise related to construction. It is not expected that implementation of Alternative 1, however, would result in any significant impacts, beneficial or adverse, to recreational facilities in the long term. Specifically, implementing Alternative 1 would not prevent the continuation of existing recreational uses, nor would it cause any loss or degradation of existing recreational facilities. Additionally, implementation of Alternative 1 would not prevent the future establishment of recreational uses in an area that supports or is designated for recreation.

4.4.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Similar to Alternative 1, implementation of the Proposed Action could result in a short-term adverse, but less than significant, impact to recreational facilities depending on the period of construction. Under the Proposed Action, camp sites to the south of Area A would also experience increased noise in the short term from activities associated with construction of the wastewater system within Area A. The distance

between the potential construction site within Area A and the camp sites varies but could be less than 100 feet from the nearest camp site. If the camp sites are in use during construction, noise abatement procedures, such as minimizing the backing up of vehicles and placing noise reducing enclosures or shrouds around portable generators or other equipment, would be implemented to minimize impacts.

In addition to potential, indirect adverse but less than significant impacts to users of the camp sites, implementation of Alternative 2 may affect the use of the Picnic Pavilion at Area C, as public access to the Picnic Pavilion would likely be restricted during construction in order to protect the health and safety of visitors. However, following construction, use of the Picnic Pavilion would not be affected in the long term, and it is not anticipated that any other recreational facilities (e.g., the camp sites near Area A) would be impacted in the long term. Additionally, implementation of the Proposed Action would not prevent the future establishment of recreational uses in an area that supports or is designated for recreation.

4.4.4 Impacts from the No Action Alternative

Under the No Action Alternative, there would be no construction and, therefore, no impact on existing recreational facilities.

4.5 Geology, Topography, and Soils

The region of influence for geology, topography, and soils at Station Tybee consists of the area that would incur ground-disturbing activities.

4.5.1 Environmental Criteria

The Proposed Action and alternatives would be considered to result in a significant impact to geology, soils, and topography impacts if:

- It causes the substantial loss of soils or compaction to the extent that prevents establishment of native vegetation within two growing seasons.
- It results in topography that does not comply with the overall topography of adjacent land.
- Causes soil erosion and/or sedimentation off site that violates Georgia State water quality standards under the Georgia Erosion Control Act.

4.5.2 Impacts from Alternative 1: Rebuild Option 1

Under Alternative 1, land clearing, demolition, and associated construction activities would disturb soil. However, best management practices (BMPs) would be implemented to minimize soil erosion and sedimentation to the Savannah River. Additionally, if construction results in disturbance of 1 or more acres of soil, an NPDES Construction General Permit would be obtained from GADNR EPD. Under Alternative 1, the eroded riprap shoreline would be restored by placing new stones, minimizing future erosion and sedimentation into the Savannah River. Minor changes to topography could occur at the Station from land grading activities under Alternative 1, but this would not cause adverse or significant impacts to the overall topography of Cockspur Island.

Ultimately, Alternative 1 would not cause substantial loss of soils or compaction preventing native vegetation growth, would not result in topography that conflicts with the overall topography of adjacent

land, and would not cause soil erosion or sedimentation offsite violating Georgia water quality standards. Overall, with implementation of BMPs and restoration of the eroded shoreline, it is anticipated that implementation of Alternative 1 would result in long-term and potentially significant beneficial impacts to soils.

4.5.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Similar to Alternative 1, under Alternative 2, land clearing, demolition, and associated construction activities would disturb soil. However, BMPs would be implemented to minimize soil erosion and sedimentation to the Savannah River, and if construction results in disturbance of 1 or more acres of soil, an NPDES Construction General Permit would be obtained. Due to the construction of additional facilities, such as the new concrete ramp in Area B and the new elevated pump house and emergency generator in Area C, it is anticipated that more soil would be temporarily disturbed under Alternative 2 than Alternative 1. Similarly, Alternative 2 would result in slightly more impervious surface from the slightly widened boat ramp and the new pump house. Under Alternative 2, the eroded riprap shoreline would also be restored by placing new stones, minimizing future erosion and sedimentation into the Savannah River. Minor changes to topography could occur from land grading at the Station under Alternative 2, but it is not anticipated that this would cause adverse or significant impacts to the overall topography of Cockspur Island.

Ultimately, Alternative 2 would not cause substantial loss of soils or compaction preventing native vegetation growth, would not result in topography that conflicts with the overall topography of adjacent land, and would not cause soil erosion or sedimentation offsite violating Georgia water quality standards. Overall, with implementation of BMPs and restoration of the eroded shoreline, it is anticipated that implementation of Alternative 2 would result in long-term potentially significant beneficial impacts to soils.

4.5.4 Impacts from the No Action Alternative

Under the No Action Alternative, no ground-disturbing activities would be undertaken, and no short-term impacts to soils or topography would occur. However, erosive forces from storm events are expected to continue to erode the shoreline at Station Tybee due to the lack of adequate protection from the deteriorating riprap. Therefore, the No Action Alternative would result in long-term adverse and potentially significant impacts on soils.

4.6 Air Quality

4.6.1 Environmental Criteria

Implementation of the Proposed Action and alternatives would be considered to result in a significant impact on climate and air quality if it resulted in an impact that causes any new violation of any standard in any area.

4.6.2 Impacts from Alternative 1: Rebuild Option 1

Demolition of existing buildings and construction of new facilities under Alternative 1 would generate emissions and could result in minor, short-term impacts to air quality. Heavy-duty construction equipment would be the primary source of air pollutants, and would generate VOCs, nitrogen oxides, SO_2, CO, $PM_{2.5}$ and PM_{10}, and GHGs from fuel combustion. Fugitive dust generation would occur from vehicle movement and soil transport.

Following the completion of demolition and construction, air quality in the Proposed Action area would not be affected from the operation of the facility. Emissions from the wastewater treatment system would not change because operations would remain consistent relative to current operations. The new MMB building would not result in an increase in personnel at the Station. Therefore, emissions associated with vehicle traffic would not increase in the long term during operations.

The short-term but less than significant air quality impacts resulting from the Proposed Action would be a temporary increase of air pollutants during demolition and construction, which would be reduced once the project was completed. Operation of the facility would not result in significant impacts on air quality in the long term.

4.6.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Impacts of Alternative 2 would be similar as those identified for Alternative 1. Additionally, there could be minor increases in vehicle traffic to the NPS water supply area in Area C and to the wastewater treatment area in Area A for maintenance and delivery of chemicals for treatment. This minor increase in vehicle traffic would be offset by the reduction in the number of miles traveled by the USCG to launch and retrieve small boats relative to the current operation or under a No Action alternative. Therefore, operations would likely result in a decrease in emissions.

The short-term but less than significant air quality impacts resulting from the Proposed Action would be a temporary increase of air pollutants during demolition and construction, which would be reduced once the project was completed. Operation of the facility would result in no long-term adverse or significant impacts on air quality. Impacts to air quality from Alternative 2 are anticipated to be short-term and negligible. Pursuant to the CAA, the proposed action is exempt from the General Conformity Rule, as there will be no reasonably foreseeable direct or indirect emissions in nonattainment or maintenance areas.

4.6.4 Impacts from the No Action Alternative

Under the No Action Alternative, no demolition or construction would occur, and the ambient air quality would remain as described in Section 3.7.2. Therefore, no impacts to air quality would occur under the No Action Alternative.

4.7 Noise

NPS Management Policy 2006 states that the NPS will preserve, to the greatest extent possible, the natural soundscapes of parks. Park natural soundscape resources encompass all the natural sounds that

occur in parks, including the physical capacity for transmitting those natural sounds and the interrelationships among park natural sounds of different frequencies and volumes. This is the basis for determining the affected environment/region of influence and impacts on a Park soundscape. Given this background, the region of influence for noise includes Fort Pulaski and the waters of the Savannah River within and in proximity to the Station Tybee shoreline and Area B.

4.7.1 Environmental Criteria

The Proposed Action and alternatives would be considered to result in a significant impact to noise impacts if:

- It would raise the ambient noise level to such a state that it would be seriously incompatible with adjacent noise receptors including natural soundscapes.
- It would be incompatible with local ordinances regarding noise, such as regulations for allowable work hours.
- It would substantially increase the number of people disturbed by the heightened noise levels on Station Tybee and/or Fort Pulaski.

4.7.2 Impacts from Alternative 1: Rebuild Option 1

Under Alternative 1, construction and demolition, including heavy equipment operation, would cause a short-term increase in noise. Noise abatement procedures would be applied, and specific mitigation measures would be developed in coordination with the NPS. Noise abatement procedures include scheduling construction, demolition, and renovation to intentionally minimize impacts to visitors, as well as the use of best available noise control techniques and the location of stationary noise sources as far from sensitive receptors as possible (NPS 2013). Long-term noise would be localized to the administrative area and would not be expected to impact the visitors' area of Fort Pulaski or locations off Cockspur Island any more than current operations. Should noise become excessive, Station Tybee has procedures in place for investigating and following up on noise complaints (Ecology & Environment 2010). Therefore, no long-term impacts from noise are anticipated. Impacts to noise are anticipated to be short-term and minimally adverse but less than significant. Implementation of Alternative 1 would not raise ambient noise levels such that they would be incompatible with adjacent noise receptors (camp sites), nor would it substantially increase the number of people disturbed by heightened noise levels, and it would be compatible with local noise ordinances. Therefore, Alternative 1 would not have a significant noise impact.

4.7.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Alternative 2 activities would occur both within and beyond the Station Tybee compound; therefore, the area of impact and the number of individuals potentially affected by noise would be greater than that for Alternative 1 or the No Action Alternative. Individuals who may experience increased noise from construction and operation would likely include Savannah Harbor Pilots personnel, NPS Park Headquarters personnel, visitors to the Picnic Pavilion at Area C, and occupants of the camp sites adjacent to Area A.

Impacts to aquatic species from proposed in-water construction, including the potential use of a vibratory hammer to install piles, would be minimized using BMPs and restricted in-water work windows. BMPs could include operating equipment and lowering materials at the lowest speeds possible and requiring all vessels associated with the project to operate at a "no wake/idle" speed at all times while in the construction area. The in-water work would be prohibited during the Atlantic sturgeon spawning migration between April 15 and May 31 and between September 1 and November 30.

During construction, noise abatement procedures similar to those in place for Alternative 1 would be applied, and specific mitigation measures would be developed in coordination with the NPS. Long-term noise would remain localized to the administrative area and would not be expected to increase over existing noise levels or impact the visitors' area of Fort Pulaski or locations off Cockspur Island. Station Tybee would implement procedures in place for investigating and following up on noise complaints (Ecology & Environment 2010).

Based on the use of BMPs during construction, including in-water work, adverse impacts from noise will be short-term and minimal (less than significant). No long-term impacts from noise are anticipated. Implementation of Alternative 2 would not raise ambient noise levels such that they would be incompatible with adjacent noise receptors (camp sites, NPS Park Headquarters), nor would it substantially increase the number of people disturbed by heightened noise levels, and it would be compatible with local noise ordinances. Therefore, pursuant to NEPA, Alternative 2 would not have a significant noise impact.

4.7.4 Impacts from the No Action Alternative

The No Action Alternative would result in ambient noise levels consistent with those currently experienced at Station Tybee and Fort Pulaski. The USCG must adhere to noise constraints as they relate to the natural environment and would continue to do so under the No Action alternative. Therefore, no impacts from noise are anticipated under the No Action Alternative.

4.8 Hazardous Materials/Waste

The region of influence for hazardous materials and waste would include the Proposed Action construction areas, post-construction operational areas, and any onsite or offsite treatment, transportation, and disposal areas associated with hazardous materials generated as a result of the Proposed Action.

4.8.1 Environmental Criteria

The Proposed Action and alternatives would result in significant adverse impacts to the environment if:

- Proposed activities resulted in a long-term (i.e., period of 5 years or more beyond completion of the project implementation) increase in the amount of hazardous materials or wastes to be handled, stored, used or disposed.
- Proposed activities resulted in non-compliance with applicable federal and state regulations
- Proposed activities resulted in increased site contamination that could preclude future use of the proposed site.

4.8.2 Impacts from Alternative 1: Rebuild Option 1

Demolition, construction, renovations, and/or repair under Alternative 1 could require the use of hazardous materials or the creation of hazardous waste. Operation of construction equipment and vehicles could result in potential discharge, spills, and contamination with commonly used products, such as diesel fuel, gasoline, oil, antifreeze, and lubricants. In addition, hazardous building materials could be exposed or released during demolition. Hazardous materials/waste would be handled according to applicable USCG instructions, practices, and procedures for the storage, handling, and transport of hazardous materials and waste, and any applicable local, state, and federal laws and regulations.

If contaminated soils are encountered during construction, USCG would develop and implement appropriate procedures for their proper management and coordinate the removal, disposal, and/or treatment of the soil as necessary. If contaminated groundwater is encountered during construction, USCG would implement appropriate measures for proper management and treatment of the water as necessary.

The operational mission at Station Tybee would not change under Alternative 1, and no change in the use, generation, or disposal of hazardous materials and/or waste is anticipated. Mitigation and BMPs would be implemented if hazardous building materials or contaminated environmental media were discovered during demolition or construction. To minimize potential for accidental releases and contamination from any releases, established BMPs would be followed, including the Spill Prevention Control and Countermeasure Plan and the USCG Marine Environmental Response and Preparedness Manual (COMDTINST M16000.14A). As Alternative 1 is not anticipated to increase the amount of hazardous materials or wastes to be handled, stored, used, or disposed, nor increase site contamination that could preclude future use of the site, and will be in compliance with applicable federal and state regulations, no significant impacts from hazardous materials and/or wastes are anticipated.

4.8.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Demolition, construction, renovations, and/or repair under Alternative 2 would impact a larger footprint, including in-water work, than Alternative 1. However, the use of hazardous materials, the generation of hazardous waste, and the BMPs to manage construction would be similar to those anticipated under Alternative 1. Hazardous materials/waste would be handled according to applicable USCG instructions, practices, and procedures for the storage, handling, and transport of hazardous materials and waste, and any applicable local, state, and federal laws and regulations.

If contaminated soils are encountered during construction, USCG would develop and implement appropriate procedures for their proper management and coordinate the removal, disposal, and/or treatment of the soil as necessary. If contaminated groundwater is encountered during construction, USCG would implement appropriate measures for proper management and treatment of the water as necessary. As Alternative 2 is not anticipated to increase the amount of hazardous materials or wastes to be handled, stored, used or disposed, nor increase site contamination that could preclude future use of the site, and will be in compliance with applicable federal and state regulations, no significant impacts from hazardous materials and/or wastes are anticipated.

The operational mission at Station Tybee would not change under Alternative 2, and no change in the use, generation, or disposal of hazardous materials and/or waste is anticipated. Mitigation and BMPs would be implemented if hazardous building materials or contaminated environmental media were discovered during demolition or construction. To minimize potential for accidental releases and contamination from releases, established BMPs (including those for in-water work proposed for Alternative 2) would be followed including the Spill Prevention Control and Countermeasure Plan, and the USCG Marine Environmental Response and Preparedness Manual (COMDTINST M16000.14A).

Based on the use of BMPs and compliance with applicable regulations and procedures, short-term impacts during construction are anticipated to be negligible. No long-term impacts from hazardous materials and/or wastes are anticipated.

4.8.4 Impacts from the No Action Alternative

Under the No Action Alternative, there would be no demolition, construction, renovations, and/or repairs that require the use of hazardous materials or the generation of hazardous waste. There would be no changes in operation that would require changes in the current use, generation, or disposal of hazardous materials and/or water. Therefore, no significant impacts are anticipated.

4.9 Biological Resources

The region of influence for biological resources at USCG Station Tybee consists of adjacent upland terrestrial vegetation, the north channel of the Savannah River, and nearby marine waters. In compliance with Section 7 of the ESA, the USCG requested to initiate consultation with the USFWS and the NOAA NMFS (see **Appendix B**).

4.9.1 Environmental Criteria

Implementation of the Proposed Action and alternatives would be considered to result in a significant impact on the biological environment if:

- It could adversely alter the terrestrial vegetation communities of Cockspur Island, in such a way that biological diversity is severely reduced or lost.
- It could alter Critical Habitats found on Cockspur Island.
- It could cause a long-term detrimental impact to the wildlife populations on Cockspur Island.
- It could cause a long-term detrimental impact to marine species in the Savannah River.
- It could result in the unpermitted “take” of migratory birds or a threatened or endangered species in the region of influence.

4.9.2 Impacts from Alternative 1: Rebuild Option 1

Demolition and construction of new facilities under Alternative 1 would occur primarily within the existing boundaries of the Station and on areas with limited terrestrial vegetation. There would be no repairs or upgrades to NPS facilities within Areas A, B, and C. Similarly, demolition and construction work would occur on areas subject to limited wildlife use. As a result, it is anticipated that implementation of

Alternative 1 would result in no significant impacts to terrestrial vegetation or wildlife communities within the region of influence.

It is anticipated that any migratory birds that may be within or in the vicinity of the region of influence would be there on a transient basis, likely foraging. Vegetation growing in the riprap along the shoreline and shallow water at high tide near the Station could provide foraging habitat for several bird species, including listed bird species. Under Alternative 1, the eroded riprap at the shoreline would be repaired. It is anticipated that any bird species that may utilize this area for foraging would avoid this area during active construction work and utilize the other available foraging habitat throughout Cockspur Island. Four federally listed birds (piping plover, red knot, wood stork, and eastern black rail) could utilize this area on a transient/foraging basis. If these identified birds were to forage near the region of influence, it is anticipated that they would instead utilize other foraging habitat on Cockspur Island during construction. While the north end of Tybee Island is designated as Critical Habitat for piping plover (federally and state listed threatened species), it is not anticipated that demolition and construction work under Alternative 1 would extend to this area and Alternative 1 would have no significant impact to the Critical Habitat for piping plover.

The nearshore federally listed marine species that could potentially be found in the vicinity of the project location boundary are the North Atlantic right whales, five species of sea turtles, Atlantic sturgeon, and shortnose sturgeon. A discussion of the impacts on these species is provided below.

North Atlantic Right Whale and Southeastern Calving Area Critical Habitat

North Atlantic right whales may be present in nearshore ocean waters seaward of the Savannah River mouth during the migration and calving season. Sightings data indicate that the peak period of right whale occurrence within a 40-mile radius of the Savannah River mouth is December through March (Knowlton et al. 2002). Nearshore waters seaward of the International Regulations for Preventing Collisions at Sea (COLREGS) demarcation line across the Savannah River mouth are part of the right whale southeastern calving area critical habitat unit that extends along the coast from central Florida to Cape Fear, North Carolina. Although potentially present in nearshore waters, right whales are not expected to enter the relatively shallow waters of the Savannah River Estuary. Alternative 1 would not include ocean disposal or any offshore vessel operations that would potentially present a collision risk to right whales. Furthermore, based on the location of the project area ~3.5 miles upriver of the ocean, no acoustic impacts on the right whale or its critical habitat would be anticipated. Therefore, Alternative 1 would have no adverse effect under Section 7 of the ESA on the North Atlantic right whale or its designated critical habitat.

Sea Turtles and Loggerhead Nearshore Reproductive Critical Habitat

Leatherback and hawksbill sea turtles are not expected to occur in the estuarine waters of the project area. The leatherback is a pelagic species of deep, offshore waters, and the hawksbill is strongly associated with coral reef and hard bottom habitats that are not present in the project area. Therefore, Alternative 1 would have no adverse effect under Section 7 of the ESA on leatherback and hawksbill sea turtles. Loggerhead, green, and Kemp's ridley sea turtles may forage in estuarine waters of the project area during the warmer months. Monthly abundance surveys detected sea turtles in the Savannah Harbor entrance channel from April through December when water temperatures were ≥14° C; whereas no sea turtles were detected during the months of January, February, and March when water

temperatures were <14° C (Dickerson et al. 1995). Alternative 1 may affect loggerhead, green, and Kemp's ridley sea turtles through acoustic disturbance, sediment suspension, and direct impacts on soft bottom foraging habitat. The principal source of potential acoustic impacts would be the driving of four steel piles to anchor the boat ramp floating docks. A vibratory hammer would be used to reduce the potential for pile driving noise impacts on sea turtles. Based on a previous assessment of pile driving noise for replacement of the Fort Pulaski Bridge across the South Channel of the Savannah River (NMFS 2012), the use of a vibratory hammer would eliminate the potential for injurious acoustic impacts on sea turtles and limit potential behavioral impacts to a small area within ~33 ft of the piles. Based on the seaward-most pile location, the potential for behavioral noise impacts would be limited to waters within ~163 ft of the shoreline, whereas the North Channel is >2,000 ft wide at the pile driving location. Thus, noise impacts would not restrict sea turtle movements within the estuary. Given the small number of piles (n=4), it is anticipated that any behavioral impacts on sea turtles would be less than significant.

During in-water construction, sediment suspension and associated increases in turbidity may affect the foraging activities of sea turtles. BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse impacts. BMPs would be coordinated with NMFS as necessary. The placement of concrete slabs and marginal riprap to construct the boat ramp would directly impact ~6,290 square feet (0.14 acre) of potential soft bottom foraging habitat. However, given the vast extent of soft bottom habitat within the lower Savannah River Estuary, it is anticipated that any impacts on sea turtles would be negligible. Based on all of the above considerations, Alternative 1 may affect but is not likely to adversely affect under Section 7 of the ESA loggerhead, green, or Kemp's ridley sea turtles. Nearshore reproductive critical habitat for the loggerhead sea turtle encompasses waters along the Tybee Island oceanfront beach from MHW to 1.6 km offshore. Based on the location of the project area ~3.5 miles inshore of the critical habitat boundary, Alternative 1 would have no adverse effect under Section 7 of the ESA on loggerhead nearshore reproductive critical habitat.

Shortnose Sturgeon, Atlantic Sturgeon, and Atlantic Sturgeon Critical Habitat

As reported by Collins et al. (2001), the movements of acoustically tagged juvenile shortnose sturgeon in the Savannah River Estuary were confined to an approximately 10-mile reach between rm 19.4 and rm 29.5. Juveniles exhibited seasonal migration patterns within the 10-mile reach, moving upriver during periods of high water temperature (>22 C) and downriver during periods of low water temperature (<22 C). Adult shortnose sturgeon exhibited a similar pattern of seasonal upstream and downstream movements; however, downstream movements were more extensive, with the lowermost detections of two individuals occurring at rm 3.4 during December. Studies in the Altamaha River have detected similar downstream movements by shortnose sturgeon to lower estuarine habitats near the river mouth during the coldest months (Ingram 2014, Devries 2006). These studies indicate that adult shortnose sturgeon may be present in the project area during seasonal low water temperature periods. Adult Atlantic sturgeon may transit the project area during spawning migration periods. Telemetry studies indicate the occurrence of separate spring and fall spawning migration runs in the Savannah River (Vine et al. 2019). Subadult Atlantic sturgeon undertake non-spawning seasonal migrations between estuarine summer foraging habitats and coastal wintering grounds (Post et al. 2014), and thus may also transit the project area during the spring and fall. Pre-migratory juvenile Atlantic sturgeon generally remain within low

salinity waters in the vicinity of the fresh-brackish water interface (ASSRT 2007), and thus are not expected to occur in the high salinity waters of the project area.

Alternative 1 may affect shortnose and Atlantic sturgeon through acoustic disturbance, sediment suspension, and direct impacts on soft bottom foraging habitat. The principal source of potential acoustic impacts would be the driving of four steel piles to anchor the floating docks. A vibratory hammer would be used to reduce the potential for pile driving noise impacts on sturgeon. Based on a previous assessment of pile driving noise for replacement of the Fort Pulaski Bridge across the South Channel of the Savannah River (NMFS 2012), the use of a vibratory hammer would eliminate the potential for injurious acoustic impacts on sturgeon and limit potential behavioral impacts to a small area within ~155 ft of the piles. Based on the seaward-most pile location, the potential for behavioral noise impacts would be limited to waters within ~285 ft of the shoreline, whereas the North Channel is >2,000 ft wide at the pile driving location. Thus, noise impacts would not impede upriver movements of migrating sturgeon. Given the small number of piles (n=4), it is anticipated that any behavioral impacts on sturgeon would be less than significant. Sediment suspension and associated increases in turbidity may affect the foraging activities of sturgeon. BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse impacts. BMPs would be coordinated with NMFS as necessary. The placement of concrete slabs and marginal riprap to construct the boat ramp would directly impact ~6,290 square feet (0.14 acre) of potential soft bottom foraging habitat. However, given the vast extent of soft bottom habitat within the lower Savannah River Estuary, it is anticipated that any impacts on sturgeon would be negligible. Based on all of the above considerations, Alternative 1 may affect, but is not likely to adversely affect under Section 7 of the ESA shortnose and Atlantic sturgeon. The impact would be less than significant.

The Savannah River from rm 0 to New Savannah Bluff Lock and Dam is designated critical habitat for the Atlantic sturgeon South Atlantic Distinct Population Segment (DPS). Under the ESA, a DPS is a vertebrate population or group of populations that is discrete from other populations of the species and significant in relation to the entire species. The physical or biological features of Atlantic sturgeon critical habitat that are essential to the conservation of the species include hardbottom substrate in low salinity waters for egg settlement and early life stage development; aquatic habitat encompassing a gradual salinity gradient (0.5-30 ppt) and soft bottom (sand/mud) substrate for juvenile foraging and development; waters of sufficient depth and absent physical barriers to passage to support unimpeded movements of adults, subadults, and juveniles; and water quality conditions (temperature and oxygen) that support spawning, survival, development, and/or recruitment of the various life stages (82 FR 39160). As described above, in-water construction activities and associated noise impacts would be confined to relatively shallow waters within ~285 ft of shore, whereas the North Channel is >2,000 ft wide. Thus Alternative 1 would not impede upriver movements of migrating sturgeon. The principal impact of Alternative 1 on essential habitat features would be the permanent loss of ~6,290 square feet (0.14 acre) of soft bottom foraging habitat. However, given the location of the project area in the lowermost high-salinity portion of the estuary, it is unlikely that the associated soft bottom habitats currently support pre-migratory juvenile foraging and development. Furthermore, alternative soft bottom habitats are expansive within the lower estuary. Therefore, Alternative 1 may affect but is not likely to adversely affect critical habitat for the Atlantic sturgeon South Atlantic DPS. The impact would be less than significant.

Additional information regarding construction techniques/methods, planned start and end times, and specific work locations would be provided to federal permitting agencies during the environmental permitting process for in-water work. All BMPs and seasonal work restrictions required by permitting agencies would be strictly followed. With implementation of BMPs and potential seasonal in-water work restrictions, it is anticipated that the undertaking would result in less than significant impacts to threatened and endangered species.

Essential Fish Habitat

Boat ramp construction would directly impact ~6,290 square feet (0.14 acre) of estuarine intertidal and shallow subtidal unconsolidated bottom habitat. The placement of concrete slabs and marginal riprap would result in permanent loss of the affected habitat and the associated soft bottom benthic infaunal communities. As EFH, intertidal and shallow subtidal unconsolidated bottom habitats in the project area function primarily as nursery habitats for managed species; including Penaeid shrimp, estuarine-dependent species of the snapper-grouper complex, bluefish, and summer flounder. The loss of intertidal and shallow subtidal unconsolidated bottom habitats would reduce the availability of nursery habitat for federally managed estuarine-dependent species. However, given the vast extent of unconsolidated bottom habitat within the lower Savannah River Estuary, it is anticipated that the undertaking would result in less than significant impacts on habitat loss for federally managed species. The USCG will consult with NOAA NMFS on Essential Fish Habitat under the ESA and Magnuson-Stevens Fishery Conservation Act when the project design is complete.

Pursuant to the MBTA, Alternative 1 will not result in a take of migratory birds or the parts, nests, or eggs of such bird. Pursuant to Section 7 of the ESA, Alternative 1 may affect, but is not likely to adversely impact threatened and endangered species. Pursuant to the Magnuson-Stevens Fishery Conservation Act, Alternative 1 will affect but is not likely to have a substantial adverse effect on EFH or Habitat Areas of Concern. Pursuant to NEPA, Alternative 1 will have no significant impact on biological resources.

4.9.3 Impacts from the Proposed Action (Alternative 2: Rebuild Option 2)

Similar to Alternative 1, demolition and construction of new facilities under Alternative 2 would occur primarily within the existing boundaries and on areas with limited terrestrial vegetation. The on-land repair and upgrade work to NPS facilities within Areas A, B, and C would also be limited to turf grass and scattered terrestrial vegetation. Similarly, work within the project location boundary would occur on areas subject to limited terrestrial wildlife use. As a result, it is anticipated that implementation of Alternative 2 would result in no impacts to terrestrial vegetation or terrestrial wildlife communities within the region of influence.

It is anticipated that any migratory birds that may be within or in the vicinity of the region of influence would be there on a transient basis, likely foraging. Vegetation growing in the riprap along the shoreline and shallow water at high tide near the Station and Area B could provide foraging habitat for several bird species, including listed bird species. Under Alternative 2, the eroded riprap at the shoreline would be repaired. It is anticipated that any bird species that may utilize this area for foraging would avoid this area during active construction work and utilize the other available foraging habitat throughout Cockspur Island. Four federally listed birds (piping plover, red knot, wood stork, and eastern black rail) could utilize this area on a transient/foraging basis. If these identified birds were to forage near the region of

influence, it is anticipated that they would instead utilize other foraging habitat on Cockspur Island during construction. While the north end of Tybee Island is designated as Critical Habitat for piping plover (federally and state listed threatened species), it is not anticipated that work under Alternative 2 would extend to this area and Alternative 2 would have no impact to the critical habitat for piping plover.

The nearshore federally listed marine species that could potentially be found in the vicinity of the Action Area are the loggerhead sea turtle, green sea turtle, Kemp's ridley sea turtle, Atlantic sturgeon, and shortnose sturgeon. A discussion of the impacts on these species is provided below.

Sea Turtles and Loggerhead Nearshore Reproductive Critical Habitat

Under Alternative 2, in-water construction activities and associated impacts on sea turtles and loggerhead critical habitat would be similar to those of Alternative 1. Additional in-water work would be required to remove the existing NPS boat ramp, resulting in additional sediment suspension and turbidity impacts. BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse impacts. BMPs would be coordinated with NMFS as necessary. The in-water construction footprint of the new ramp would be the same as Alternative 1; however, since a portion of the footprint is taken up by the existing NPS concrete ramp, direct impacts on potential soft bottom forging habitats for sea turtles would be slightly reduced to ~5,710 square feet (0.13 acre) under Alternative 2. The overall impact of Alternative 2 on loggerhead, green, and Kemp's ridley sea turtles would be comparable to those of Alternative 1 and may affect but is not likely to adversely affect under Section 7 of the ESA these species. Based on the previously described habitat requirements of leatherback and hawksbill sea turtles, Alternative 2 would have no effect under Section 7 of the ESA on these species. Based on the location of the project area ~3.5 miles from the nearshore reproductive critical habitat boundary, Alternative 2 would have no effect under Section 7 of the ESA on designated critical habitat for the loggerhead sea turtle.

Shortnose Sturgeon, Atlantic Sturgeon, and Atlantic Sturgeon Critical Habitat

Under Alternative 2, in-water construction activities and associated impacts on sturgeon and critical habitat for the Atlantic sturgeon South Atlantic DPS would be similar to those of Alternative 1. As described above, additional in-water work to demolish the existing NPS boat ramp would result in minor additional sediment suspension and turbidity impacts. Where possible, demolition would be conducted at low tide to reduce the extent and duration of sediment suspension. Additionally, BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse impacts. BMPs would be coordinated with NMFS as necessary. Since a portion of the ramp construction footprint is taken up by the existing NPS concrete ramp, direct impacts on potential soft bottom forging habitat for sturgeon and critical habitat for the Atlantic sturgeon would be slightly reduced to ~5,710 square feet (0.13 acre) under Alternative 2. The overall impact of Alternative 2 on shortnose and Atlantic sturgeon and Atlantic sturgeon critical habitat would be comparable to that of Alternative 1; namely, Alternative 2 may affect, but is not likely to adversely impact under Section 7 of the ESA, these species and habitat. The impact would be less than significant.

The USCG initiated consultation with USFWS under Section 7 of the ESA. The USCG determined under Section 7 of ESA that the Proposed Action would have no effect on the following USFWS regulated species and habitat resources: piping plover, red knot, wood stork, eastern black rail, and nesting populations of green sea turtle, hawksbill sea turtle, leatherback sea turtle, loggerhead sea turtle, and Kemp's ridley sea turtle. The USCG also determined that the Proposed Action may affect, but is not likely to adversely impact, the USFWS regulated West Indian manatee. On October 17, 2020, the USFWS issued its concurrence with the determination of "No Effect" for all identified species except the eastern black rail, which subsequently was listed under the ESA as threatened and was addressed separately in February 3, 2021 correspondence from the USFWS (see **Appendix A**). The USFWS noted that it would support a "No Effect" determination for the eastern black rail if site conditions (aquatic interface armored with no tidal marsh) indicate there is no habitat present for the eastern black rail. Based on the information presented in Section 3.8.4.1, the USCG has determined under Section 7 of the ESA that the Proposed Action will have no effect on eastern black rail and, as such, no further consultation with USFWS is required.

Per the USFWS, because there are no Marine Mammal Protection Act (MMPA) take regulations in place, there continues to be a "no take" standard for manatees. That is, the USFWS is precluded from authorizing incidental take of manatees in the ESA consultation process for any project that would be reasonably certain to result in take of manatees. In making its determinations, the USFWS will give consideration to the presence or absence of State and local manatee protection measures, as well as any other scientific or commercially available information. (USFWS 2003) USCG has consulted with USFWS for impacts to manatees under the ESA. The ESA consultation concluded that the USCG's proposed action may affect but is not likely to adversely affect the manatee. No incidental take is necessary. Therefore, no further consultations under the MMPA for the manatee are required.

In addition to the above, the USCG determined under Section 7 of the ESA that the Proposed Action may affect, but is not likely to adversely affect, the following NOAA NMFS regulated species and habitat resources: open water populations of loggerhead sea turtle, green sea turtle, Kemp's ridley sea turtle, shortnose sturgeon, and Atlantic sturgeon, as well as critical habitat for the Atlantic sturgeon South Atlantic DPS. The NOAA NMFS deferred making a determination of effect on species under its jurisdiction until a detailed design is available. Control measures are included in the Proposed Action to avoid adverse effects.

Additional information regarding construction techniques/methods, planned start and end times, and specific work locations would be provided to permitting agencies during the environmental permitting process for in-water work. It is anticipated that in-water work under Alternative 2 would result in slightly less permanent in-water disturbance than Alternative 1 (approximately 592 square feet) and, with implementation of BMPs and/or potential seasonal in-water work restrictions, it is anticipated that the undertaking would result in a less than significant impact to threatened and endangered species.

Essential Fish Habitat

Under Alternative 2, in-water construction activities and associated impacts on EFH/HAPC would be similar to those of Alternative 1. Additional in-water work would be required to remove the existing NPS boat ramp, resulting in additional temporary sediment suspension and turbidity impacts on EFH/HAPC. BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients,

pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse impacts. BMPs would be coordinated with NMFS as necessary. The in-water construction footprint of the new ramp would be the same as Alternative 1; however, since a portion of the Alternative 2 footprint is taken up by the existing NPS concrete ramp, direct impacts on intertidal and shallow subtidal unconsolidated bottom habitat would be slightly reduced to ~5,710 square feet (0.13 acre). The impacts of unconsolidated bottom EFH loss on federally managed species would be comparable to those of Alternative 1. Given the vast extent of unconsolidated bottom habitat within the lower Savannah River Estuary, it is anticipated that impacts of habitat loss on federally managed species would be less than significant under Alternative 2.

Pursuant to the MBTA, the proposed action will not result in a take of migratory birds or the parts, nests, or eggs of such bird. Pursuant to Section 7 of the ESA, the Proposed Action may affect, but is not likely to adversely impact threatened and endangered species. Pursuant to the Magnuson-Stevens Fishery Conservation Act, the proposed action will affect but is not likely to have a substantial adverse effect on EFH or Habitat Areas of Concern. Pursuant to NEPA, the proposed action will have no significant impact on biological resources.

4.9.4 Impacts from the No Action Alternative

Under the No Action Alternative, no demolition or construction would occur. There would be no disturbance to terrestrial habitat and wildlife populations on Cockspur Island. Therefore, pursuant to NEPA, the No Action Alternative would have no impact on these resources and would have no take of migratory birds pursuant to the MBTA.

In the absence of improvements, shoreline erosion would continue to undermine the revetment, resulting in progressive slumping and seaward displacement of riprap. Riprap displacement would have less than significant impacts on potential soft bottom foraging habitats for sea turtles and sturgeon. The suspension of sediments eroded from the shoreline would have less than significant impacts on estuarine water quality. These less than significant impacts may affect but are not likely to adversely affect under Section 7 of the ESA sea turtles or sturgeon.

Riprap displacement would have less than significant impacts on unconsolidated bottom EFH just beyond the structure toe. The suspension of sediments eroded from the shoreline would have less than significant water quality impacts on the estuarine water column. Otherwise, the distribution and extent of intertidal and shallow subtidal EFH in the vicinity of the project area would continue to fluctuate in response to natural erosional and accretional processes. Pursuant to Section 7 of the ESA, the No Action alternative will have no effect on threatened and endangered species. Pursuant to the Magnuson-Stevens Fishery Conservation Act, the No Action alternative will have no substantial adverse effect on EFH or Habitat Areas of Concern.

4.10 Water Resources

4.10.1 Surface Waters

The region of influence for surface waters is defined as the nearshore waters that surround USCG Station Tybee at Fort Pulaski.

4.10.1.1 Environmental Criteria

Implementation of the Proposed Action and alternatives would be considered to result in a significant impact on surface water if:

- It could cause an exceedance of a Total Maximum Daily Load.
- It could cause a change in the impairment status of a surface water.
- It could cause an unpermitted direct impact on a WOTUS.

4.10.1.2 Impacts from Alternative 1: Rebuild Option 1

During demolition and construction under Alternative 1, careful measures would be taken to prevent any detrimental impacts to the surrounding water quality of the nearby Savannah River. Land-disturbing activities would be conducted in accordance with the BMPs outlined in Section 2 so that water quality would not be degraded by erosion and sedimentation from stormwater. In addition, during the design phase of the project, the USCG would integrate stormwater low-impact development mechanisms to lessen impacts to surrounding surface waters from stormwater runoff. It is not anticipated that a significant increase in impervious surface would result under Alternative 1, as existing buildings would be demolished and replaced, water and wastewater treatment systems would be repaired, and no repairs or upgrades to NPS facilities would occur.

Under Alternative 1, a new boat ramp would be constructed adjacent to the existing pier, potentially resulting in approximately 6,300 square feet of permanent disturbance below MHW. Additionally, stone would be placed along the shoreline near the Station where riprap has been eroded to stabilize the shoreline and prevent future erosion. Implementing Alternative 1 would result in less than significant adverse long-term impacts from the loss of 6,300 square feet of bottom within the Savannah River. Alternative 1 would also result in long-term beneficial impacts on Savannah River water quality from restoration of the eroded shoreline and protection from erosion of the shoreline and deposition of sediment into surface waters. Per GADNR's email on September 8, 2020, any work below MHW would require coordination with GADNR Coastal Resources Division for authorization. The USCG would work with GADNR to identify and obtain the appropriate authorizations before the start of work.

Under Alternative 1, no upgrades to the NPS wastewater treatment system in Area A are planned to occur. As the current wastewater treatment system is operating with insufficient capacity, it does not adequately filter pollutants that may then enter into the groundwater system and eventually enter the Savannah River. Pursuant to NEPA, this would result in additional long-term, adverse but less than significant, indirect impacts to surface water quality. Pursuant to the CWA, Alternative 1 will have no measurable impacts on water quality, and pollutant concentrations would be below or within existing conditions or designated uses.

4.10.1.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

During demolition and construction under Alternative 2, careful measures would be taken to prevent any detrimental impacts to the surrounding water quality of the nearby Savannah River. All land-disturbing activities would be conducted in accordance with the BMPs outlined in Section 2 so that water quality

would not be degraded by erosion and sedimentation from stormwater. In addition, during the design phase of the project, the USCG would integrate stormwater low-impact development mechanisms to lessen impacts to surrounding surface waters from stormwater runoff. It is anticipated that the increase in impervious surface under Alternative 2 would be slightly greater than that with Alternative 1 due to the enlargement of the NPS boat ramp and upgrades to NPS facilities in Areas A, B, and C, including construction of a new elevated pump house and emergency generator.

Under Alternative 2, construction of the new boat ramp below MHW would result in approximately 5,708 square feet of additional permanent loss of tidal bottom below MHW relative to existing conditions. As under Alternative 1, additional stone would be placed along the shoreline at the Station where riprap has been eroded to stabilize the shoreline and prevent future erosion. Implementing Alternative 2 would result in less than significant adverse, long-term impacts from the loss of an additional approximate 5,708 square feet of tidal bottom within the Savannah River. Alternative 2 would also result in long-term beneficial impacts on Savannah River water quality from restoration of the eroded shoreline and protection from erosion of the shoreline and deposition of sediment into surface waters. Per GADNR's email on September 8, 2020, any work below MHW would require coordination with GADNR Coastal Resources Division for authorization (GADNR 2020c). The USCG would work with GADNR to identify and obtain the appropriate authorizations before the start of work.

Under Alternative 2, upgrades to the NPS wastewater treatment system in Area A would occur, which would increase the capacity of the system and allow the system to adequately filter pollutants that may currently being entering the groundwater system and eventually the Savannah River. Pursuant to NEPA, these upgrades would result in long-term, beneficial, less than significant indirect impacts to surface water quality. Pursuant to the CWA, the proposed action will have no measurable impacts on water quality, and pollutant concentrations would be below or within existing conditions or designated uses.

4.10.1.4 Impacts from the No Action Alternative

Under the No Action Alternative, no land disturbance would occur; therefore, no sedimentation to surface waters would occur from project work. No additional impervious surface would result under this alternative, and stormwater runoff would not be affected. The eroded shoreline would not be repaired with additional stone, which is anticipated to lead to future erosion and sedimentation in the Savannah River and result in long-term, adverse but less than significant, direct impacts to water quality. Additionally, no upgrades to the NPS wastewater treatment system in Area A would occur. As the current wastewater treatment system has insufficient capacity, it does not adequately filter pollutants that may enter into the groundwater and eventually enter the Savannah River. Pursuant to NEPA, this would result in long-term, adverse but less than significant, indirect impacts to surface water quality. Pursuant to the CWA, the No Action Alternative will have no measurable impacts on water quality, and pollutant concentrations would be below or within existing conditions or designated uses.

4.10.2 Groundwater

The region of influence for groundwater is defined as the underlying aquifer beneath Station Tybee and Fort Pulaski on Cockspur Island.

4.10.2.1 Environmental Criteria

Implementation of the Proposed Action and alternatives would be considered to result in a significant impact on groundwater if:

- It could substantially deplete groundwater supplies.
- It could interfere with groundwater recharge.
- It could cause a detrimental impairment to groundwater quality.

4.10.2.2 Impacts from Alternative 1: Rebuild Option 1

Demolition and construction work under Alternative 1 may encounter groundwater, which is approximately 6 to 9 feet below the ground surface. Careful measures would be taken to prevent any detrimental impacts to groundwater quality. It is not anticipated that contaminated soils or contaminated groundwater would be encountered during construction and demolition. If contaminated soils and/or contaminated groundwater are encountered, USCG would develop and implement appropriate procedures for management of hazardous waste in accordance with applicable federal, state, and local laws and regulations. Contaminated soil and groundwater would be removed, disposed, and/or treated, as necessary, to prevent contaminants from entering the underlying aquifer or the spread of any existing groundwater contamination. Therefore, it is not anticipated that construction and demolition work under Alternative 1, if groundwater is encountered, would cause adverse but less than significant impacts to groundwater quality.

Under Alternative 1, no upgrades to the NPS wastewater treatment system in Area A are planned to occur. As the current wastewater treatment system has insufficient capacity, it does not adequately filter pollutants that may then enter the groundwater. This would result in long-term, adverse but less than significant, direct impacts to groundwater quality.

4.10.2.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

Demolition, construction, and repair/upgrade work under Alternative 2 may encounter groundwater. Careful measures would be taken to prevent any detrimental impacts to the groundwater quality. It is not anticipated that contaminated soils or contaminated groundwater would be encountered during construction and demolition. If contaminated soils and/or contaminated groundwater are encountered, USCG would develop and implement appropriate procedures for proper management of hazardous waste in accordance with applicable federal, state, and local laws and regulations. Contaminated soil and groundwater would be removed, disposed, and/or treated, as necessary, to ensure that soil contamination did not enter the groundwater system and any existing groundwater contamination did not spread. Therefore, it is not anticipated that work under Alternative 2, if groundwater is encountered, would cause adverse but less than significant impacts to groundwater quality.

Under Alternative 2, upgrades to the NPS wastewater treatment system in Area A would occur, which would increase the capacity of the system and allow the system to adequately filter pollutants that may previously have entered into the groundwater system and eventually the Savannah River. These upgrades would result in long-term, beneficial, indirect impacts to groundwater quality.

4.10.2.4 Impacts from the No Action Alternative

Under the No Action Alternative, no construction work would occur that would disturb land or groundwater. No upgrades to the NPS wastewater treatment system in Area A would occur. As the current wastewater treatment system has insufficient capacity, it does not adequately filter pollutants that may then enter into the groundwater. This would result in long-term, adverse but less than significant, indirect impacts to groundwater quality.

4.10.3 Wetlands

The region of influence for wetlands is defined as the nearshore waters that surround USCG Station Tybee at Fort Pulaski Cockspur Island and the upland areas within and adjacent to the project location boundary. There are no mapped wetlands within the region of influence, and no jurisdictional tidal or freshwater wetlands were identified during the site visit. Tidal marshes observed south of Area C are located outside of the project location boundary.

4.10.3.1 Environmental Criteria

Significant adverse impacts to wetlands would occur as a result of the Proposed Action and alternatives if it:

- Fills or alters a portion of wetland that would cause irreversible negative impacts to species or habitats of high concern
- Irreversibly degrades the quality of a unique or pristine wetland
- Results in reductions of population size or distribution of species of high concern.

4.10.3.2 Impacts from Alternative 1: Rebuild Option 1

There are no jurisdictional tidal or freshwater wetlands located within the project location boundary. During demolition and construction work under Alternative 1, BMPs, as outlined in Section 2, would be implemented to minimize erosion and sedimentation to nearby wetlands including tidal marshes south of Area C. As a result of these factors, there would be no filling or other alteration of wetlands, nor would there be an irreversible degradation of wetland quality or a reduction in population size with regards to species of high concern. Therefore, no impacts to wetlands are anticipated.

4.10.3.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

There are no jurisdictional tidal or freshwater wetlands located within the project location boundary. During demolition and construction work under Alternative 2, BMPs, as outlined in Section 2, would be implemented to minimize erosion and sedimentation to nearby wetlands including tidal marshes south of Area C. As a result of these factors, there would be no filling or other alteration of wetlands, nor would there be an irreversible degradation of wetland quality or a reduction in population size with regards to species of high concern. Therefore, no impacts to wetlands are anticipated.

4.10.3.4 Impacts from the No Action Alternative

As there are no jurisdictional tidal or freshwater wetlands within the project location boundary, and because no demolition or construction work would occur, there would be no impacts to wetlands under the No Action Alternative.

4.10.3.5 Exemption from NPS Wetland Statement of Findings Requirements

Executive Order 11990 – Protection of Wetlands, directs all federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. In the absence of such alternatives, parks must modify actions to preserve and enhance wetland values and minimize degradation. Consistent with Executive Order 11990 and NPS Director's Order #77-1: Wetland Protection, NPS adopted a goal of "no net loss of wetlands." Director's Order #77-1 states that for new actions where impacts to wetlands cannot be avoided, proposals must include plans for compensatory mitigation that restores wetlands on NPS lands, where possible, at a minimum acreage ratio of 1:1.

The NPS defines wetlands as vegetated areas that are flooded or saturated for a duration sufficient to allow development of at least one of the three wetland indicators described in the 1987 U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual (USACE 1987). The three wetland indicators used include wetland hydrology, hydric soil, or hydrophytic vegetation. This definition differs from that used by USACE to delineate jurisdictional wetlands. The USACE definition requires the presence of all three wetland indicators for an area to be classified as a wetland.

A wetlands survey was conducted during the week of July 13-17, 2020. No NPS definition wetlands were observed in Alternative 2 Proposed Action project areas.

4.10.4 Floodplains

The region of influence for floodplain includes Station Tybee and the areas within and adjacent to the project location boundary mapped by FEMA on the National Flood Hazard Layer as a coastal high hazard area (i.e., 100-year floodplain).

4.10.4.1 Environmental Criteria

Implementation of the Proposed Action and alternatives would be considered to result in a significant adverse impact if it:

- Threatens or damages unique hydrologic characteristics.
- Endangers public health by creating or worsening health hazard conditions.
- Violates established laws or regulations adopted to protect floodplains.

4.10.4.2 Impacts from Alternative 1: Rebuild Option 1

Most of the project location boundary is located within the 100-year floodplain, except for portions of the Station and Area A. Avoiding the 100-year floodplain completely is not feasible, as the existing buildings

to be demolished and rebuilt are partially located within the floodplain. Construction within the floodplain would be minimized where possible. The new concrete dock would be designed and constructed to withstand 100-year flooding events. The existing Station's three main buildings occupy approximately 15,400 square feet of ground area, some of which is within the 100-year floodplain. The new MMB would occupy an estimated 14,300 square feet of ground area. As the existing site has buildings and facilities currently located within the floodplain, and the new building would occupy less ground area, it is anticipated that Alternative 1 would have a potential beneficial impact on the floodplain. It is not expected that this Alternative would threaten or damage unique hydrologic characteristics, endanger public health, or violate established laws/regulations that protect floodplains. Pursuant to NEPA, Alternative 1 will have no significant impact on floodplains. Pursuant to E.O. 11988, Alternative 1 will have no adverse impact on floodplains.

4.10.4.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

Most of the project location boundary is located within the 100-year floodplain, except for portions of the Station and Area A. Avoiding the 100-year floodplain completely is not feasible, as the existing buildings to be demolished and rebuilt and the NPS facilities located in Areas A, B, and C are partially or entirely located within the floodplain. Construction within the floodplain would be minimized where possible. The new MMB would occupy an estimated 14,300 square feet of ground area. The new concrete dock would be designed and constructed to withstand 100-year flooding events. The new pump house is designed to be elevated to also withstand 100-year flooding events. As the existing Station has buildings and facilities currently located within the floodplain, the new MBB at the Station would occupy less ground area, and the addition of the new pump house is not expected to result in a net increase in occupancy of ground area within the 100-year floodplain, it is not anticipated that implementation of Alternative 2 would result in an adverse impact on the floodplain. There is no land outside of the floodplain upon which Station Tybee could be relocated in the study area. At this time, it is not expected that this Alternative would threaten or damage unique hydrologic characteristics, endanger public health, or violate established laws/regulations that protect floodplains. Pursuant to NEPA, the proposed action will have no significant impact on floodplains. Pursuant to E.O. 11988, the proposed action will have no adverse impact on floodplains.

4.10.4.4 Impacts from the No Action Alternative

The No Action Alternative does not include demolition, construction, or repair work. Pursuant to NEPA, this alternative will have no significant impact on floodplains. Pursuant to E.O. 11988, this alternative will have no adverse impact on floodplains.

4.10.5 Coastal Policies and Resources

The region of influence for coastal polices and resources is defined as the nearshore waters that surround USCG Station Tybee at Fort Pulaski Cockspur Island and the upland areas within and adjacent to the project location boundary.

4.10.5.1 Environmental Criteria

The Proposed Action would have a significant adverse impact on coastal polices and potentially the resources associated with those policies if it would induce activities that would not be consistent to the maximum extent practicable with the State of Georgia's coastal management enforceable policies.

4.10.5.2 Impacts from Alternative 1: Rebuild Option 1

As discussed elsewhere in Section 4, specifically in the evaluation of impacts on biological resources (Section 4.9), water resources (Section 4.10), and cultural resources (Section 4.11), implementation of Alternative 1 would result in negligible impacts on most resources within the coastal zone, except for historic resources, which are anticipated to be adversely affected. Measures to address adverse visual impacts were included in the signed March 23, 2021 by the USCG, NPS, and the GA SHPO (see **Appendix E**). These measures include architectural treatment of the building exterior, interpretive signage, and procedures for investigation and potential recovery of extant archaeological resources that may be encountered during construction. Therefore, Alternative 1 would be consistent, to the maximum extent practicable, with the enforceable policies of the Georgia CMP.

4.10.5.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

As discussed elsewhere in Section 4, specifically in the evaluation of impacts on biological resources (Section 4.9), water resources (Section 4.10), and cultural resources (Section 4.11), implementation of Alternative 2 would result in adverse but less than significant impacts on coastal resources. These include the adverse visual impacts on historic resources and the cultural landscape of Fort Pulaski from the new MMB building and the adverse impacts on the tidal bottom of the Savannah River from the upgrade of the NPS boat ramp. Measures to address adverse visual impacts were included in the MOA signed by the USCG, NPS, and the Georgia GA SHPO. The USCG completed a Federal Consistency Determination in accordance with Section 307(d) of the Coastal Zone Management Act of 1972 and 15 CFR Part 930, Subpart F to evaluate the Proposed Action's effects on those resources and enforceable policies (see **Appendix C**). The USCG determined that the Proposed Action would be consistent to the maximum extent practicable with the Georgia CMP enforceable policies, administered by the GADNR Coastal Resources Division. The Georgia CMP staff reviewed the USCG federal consistency determination and concurred that the planning and design of the activities included under the Proposed Action are consistent to the maximum extent practicable with Georgia CMP's enforceable policies (see **Appendix C**).

4.10.5.4 Impacts from the No Action Alternative

Under the No Action Alternative, with no repair of the existing riprap along the shoreline at Station Tybee and no upgrade of the wastewater treatment system, direct adverse but less than significant impacts to the Savannah River from erosion along the shoreline and direct adverse but less than significant impacts to the aquifer from a lack of adequate filtration of the existing septic system at Station Tybee would continue. This would not be consistent, to the maximum extent practicable, with the enforceable policies of the Georgia CMP.

4.11 Cultural Resources

The APE for cultural resources at USCG Station Tybee consists of the land that may be disturbed by the Proposed Action as well as adjacent areas that may contain cultural resources that could be impacted by the Proposed Action. In compliance with Section 106 of the NHPA, the USCG requested to initiate consultation with the GA SHPO (see **Appendix B**). The GA SHPO responded to this request in a letter dated December 11, 2020 (see **Appendix B**).

4.11.1 Environmental Criteria

Under criteria listed in Section 106 of the NHPA regulations in 36 CFR Part 800, adverse effects on historic properties from implementation of the Proposed Action and alternatives would include one or more of the following:

- Physical destruction of or damage to all or part of the property.
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous substance remediation, and provision of handicapped access, that is not consistent with applicable guidelines.
- Removal of a resource from its historic location.
- Change of the character of the property's use or of physical features within its setting that contribute to its historic significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

4.11.2 Impacts from Alternative 1: Rebuild Option 1

Demolition of the current building and construction of the new MMB would have no effect on architectural resources. No NRHP-eligible buildings or structures are located on Station Tybee, and none would be demolished under Alternative 1. Noise associated with these activities is not anticipated to affect the historic Park Headquarters, a contributing structure of Fort Pulaski National Monument, which is located more than 700 feet from the Station. There are no other architectural resources within the aboveground APE that may be considered a sensitive receptor. However, any intrusive noise associated with demolition and construction would be temporary and would be minimized, to the extent practicable, using BMPs. The new MMB would be located in the same general location as the existing Station Building/Shops Building/ANT Tybee Building; therefore, the presence of a building within the cultural landscape would not be changed.

Based on the current design for the proposed undertaking, the USCG, in consultation with the NPS, determined under Section 106 that due to the increased height and scale of the new Station (albeit minimal), the undertaking will have an adverse effect on the Fort Pulaski National Monument. The GA SHPO concurred that the proposed project will have an adverse effect on historic properties that are

listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2), due to the direct impact of the project on the NRHP-listed Fort Pulaski National Monument and the increased height and scale of the proposed MMB (see **Appendix B**). The new MMB would not destroy or damage Fort Pulaski or any historic resources, however.

Under the terms of the IAA, construction of the new MBB would need to be appropriate for the Park Area and consistent with the Park Area's General Management Plan and applicable laws. The new MMB would not change the character of Fort Pulaski's use or of physical features within its setting that contribute to its historic significance. However, the new building would be different in appearance. The new building would likely be made of different materials than the existing buildings and is anticipated to be visible to some degree from the Park Headquarters but would not be visible throughout most of Fort Pulaski. Additionally, the MMB would be a minor element to the existing built environment and would be designed so as to complement its setting and other surrounding buildings to the maximum extent practicable. Therefore, while there is a potential for adverse visual effects on Fort Pulaski from construction and operation of the MMB, these effects would be minor and would not constitute a significant adverse effect.

Noise associated with construction of the new MMB may temporarily affect the Park Headquarters, which is part of the cultural landscape and contributing to the NRHP-listed Fort Pulaski. The Park Headquarters is located within the aboveground APE and may be considered a sensitive receptor. However, any intrusive noise associated with demolition and construction would be temporary and would be minimized to the extent practicable using BMPs.

Measures to minimize the adverse effect of Alternative 1 that have been identified to date include the following:

- The USCG will provide for the research, development, and installation of three appropriate interpretative wayside markers on Fort Pulaski's public Lighthouse Overlook Trail, which provides views of the National Register Listed Cockspur Island Lighthouse, now managed by the NPS but formerly managed by the USCG and its predecessors. The interpretive waysides will provide a historical perspective of the USCG's rich history on Cockspur Island for the purpose of providing information and education of the general public visiting Fort Pulaski. The waysides will meet NPS graphic identity standards.
- Prior to commencing any earth moving activities, the USCG will develop an Unanticipated Discovery Plan to cover all disturbed areas, written by a qualified archeologist. The Unanticipated Discovery Plan will be activated if a potential cultural resource is encountered.
    - The GA SHPO and NPS will be provided the opportunity to review and comment on the design of the new MMB and associated infrastructure. Review and comment will occur at the 35% Structural and Site Design and 65% Structural and Site Design phases. The GA SHPO and the NPS will have 30 days to provide comments on the 35% design and 65% design, respectively. The USCG will review all comments and provide written responses to the SHPO and the NPS detailing how each comment is being incorporated or, in the event the comment cannot be incorporated, the budget and mission constraints that were the basis of that decision.

The measures listed above are specified in the MOA, which GA SHPO indicated during the Section 106 consultation that it supports as a means to address the identified adverse effect. The MOA was

developed with the NPS and the GA SHPO, agreed upon during the Section 106 consultation process and signed by all consulting parties (see **Appendix E**).

The GA SHPO determined that adequate measures have been taken to attempt to minimize or avoid the adverse effect, including exploring alternate locations, rehabilitation, and revised designs. The SHPO concluded that it appears that the adverse effect resulting from the undertaking is unavoidable (see **Appendix B**). While Alternative 1 would have an adverse effect as determined under Section 106 of the NHPA, the impact would be less than significant pursuant to NEPA.

4.11.3 Impacts from Proposed Action (Alternative 2: Rebuild Option 2)

Impacts related to construction and operation of a new MMB and other improvements within the USCG Station compound and adverse effect identified as a result of consultation under Section 106 of the NHPA would be similar to those identified for Alternative 1. Upgrade/replacement of the wastewater treatment system in Area A under Alternative 2 would have no effect on archaeological resources or historic resources, as there are none currently within this area. Demolition of the current boat ramp and construction of the upgraded NPS boat ramp in Area B would have no effect on architectural resources, as the NPS has determined and the SHPO concurred that the existing boat ramp is not a contributing element of the NRHP-listed Fort Pulaski National Monument. Noise associated with demolition of the existing boat ramp and construction of the upgraded boat ramp may affect Park Headquarters, which is located approximately 250 feet away and may be considered a sensitive receptor. However, any intrusive noise associated with demolition and construction would be temporary and would be minimized to the extent practicable using BMPs. Noise from operation of the boat ramp would be minimal and would result in a negligible impact. Construction of a new pump house in Area C would have no effect on architectural resources, as the area is screened from view from the Park Headquarters, the NPS Maintenance Complex, and Fort Pulaski. Additionally, measures to provide for resiliency of the 1943-era well head would have no adverse effect, as NPS has indicated that the well head is not eligible for listing to the NRHP due to a lack of integrity, and the SHPO made a similar determination (see **Appendix B**).

Measures to avoid or minimize the adverse effect of Alternative 2 are identified in the MOA and include those specified for Alternative 1, as well as the following:

- For Area A, an archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. To minimize potential effects, the USCG will also provide gravel for all equipment staging areas located in this area.
- For Area B, an archeologist will be on-site during all ground disturbing activities associated with the boat ramp upgrade portion of the undertaking and will monitor for the discovery of any potential cultural resources. The USCG will also ensure that any construction equipment, heavy equipment, and staging equipment identified by the MOA avoids the location of a probable resource identified in the 2011 Southeast Archeological Center report. If usage of that area becomes necessary, the USCG will provide matting to minimize impacts.
- For Area C, an archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. The USCG will also provide for remote sensing in the area associated with the existing well and distribution system. Should intact subsurface features be present, the USCG will reroute any planned ground disturbance that would otherwise disturb them. Additionally, if ground disturbance below five feet is necessary, the USCG will consult further with the

NPS and the GA SHPO regarding effects to potential cultural resources prior to commencing activity below five feet in depth.

While the USCG has determined under Section 106 of the NHPA that the Proposed Action will have an adverse effect on Fort Pulaski National Monument, the USCG has concluded that the impact will be less than significant due to the measures to be implemented as part of the Proposed Action. Pursuant to NEPA, the proposed action will have no significant impact on cultural resources.

4.11.4 Impacts from the No Action Alternative

The No Action Alternative would result in no adverse effect on cultural resources within either the archaeological or aboveground APE. Existing archaeological and architectural resources would remain undisturbed, and their respective APEs would remain as described in Section 3.10.

5 COMPARISON OF ALTERNATIVES AND CONCLUSIONS

5.1 Comparison of the Environmental Consequences of the Alternatives

This EA has evaluated the potential physical, natural, cultural, and cumulative effects of the USCG's proposed construction of a new MMB, demolition of the Station Building and support buildings, upgrade of wastewater treatment and water supply systems, and upgrade of the existing NPS boat ramp to increase the operational capability of Station Tybee and its resiliency, as detailed in Section 2.2. The Proposed Action and Rebuild Option 1 were evaluated in addition to the No Action Alternative. A comparison of the environmental consequences of these alternatives is provided in **Table 5-1**. All impacts would be reduced with the implementation of BMPs and minimization measures (see Section 4).

5.2 Conclusion

This EA concludes that there would be no significant adverse impacts to the local physical and natural environment as a result of implementing the Proposed Action, with the adherence to mitigation measures and BMPs specified in this EA. Therefore, an EIS is unnecessary for implementing the Proposed Action, and a FONSI is appropriate. The Rebuild Option 2 was determined by the USCG to best meet the purpose of and need for the Proposed Action by providing onshore assets that meet the USCG's mission requirements. Implementation of the Preferred Action Alternative would reduce the USCG's vulnerability to adverse weather events and similar types of natural disasters and would improve operational readiness and response at Station Tybee. The No Action Alternative and Rehabilitation Option 1 were found not to fully satisfy the purpose of and need for the Proposed Action. As such, this EA recommends implementation of the Preferred Action Alternative.

The USCG will strive to comply with all EA mitigation measures recommended to ensure impacts to cultural and natural resources are avoided or minimized and are not significant. If the USCG is unable to complete any recommended mitigation, or the regulatory findings are other than what have been anticipated and described in this EA, the USCG will supplement the findings of this EA. Additionally, the USCG will not begin any on-shore or in-water work until all regulatory consultation requirements are complete and all required environmental permits have been issued.

Table 5-1: Summary of Potential Impacts to Affected Environmental Resources

Environmental Resources				
	Sub-Category	**Alternative 1**	**Alternative 2 (Preferred Alternative)**	**No-Action Alternative**
Land Use		No Significant Impacts	No Significant Impacts	No Impact

Environmental Resources	Sub-Category	Alternative 1	Alternative 2 (Preferred Alternative)	No-Action Alternative
Infrastructure & Utilities		Long term, less-than-significant adverse impact	Long-term, less-than-significant beneficial impact	Long-term, Significant Adverse Impact
Socioeconomics		NEPA: Short-term, less-than-significant beneficial impact E.O. 12898: No disproportionate impacts	NEPA: Short-term, less-than significant beneficial impact E.O. 12989: No disproportionate impacts	NEPA: No Impact E.O. 12898: No Impact
Recreational Facilities		Short-term, less-than -significant adverse impact	Short-term, less than significant adverse impact	No Impact
Soils		Long-term, less-than-significant beneficial impact	Long-term, less-than-significant beneficial impact	Long-Term, significant adverse impact
Climate and Air Quality		Long -term, less-than-significant impact	Long-term, less-than-significant impact	No Impact
Noise		Short-term, less-than-significant adverse impact	Short-term, less-than significant adverse impact	No Impact
Hazardous Materials/Waste		No Impact	No Impact	No Impact
Biological Resources	Terrestrial Vegetation	No Impact	No Impact	No Impact
	Wildlife	No Impact	No Impact	No Impact
	Migratory Birds	NEPA: No Impact MBTA: No take	NEPA: No Impact MBTA: No take	NEPA: No Impact MBTA: No take
	Threatened and Endangered Species	NEPA: Short-term, less than significant adverse impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take	NEPA: Short-term, less-than-significant adverse impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take	NEPA: No Impact ESA: May affect but not likely to adversely affect aquatic species MMPA: No take

Environmental Resources	Sub-Category	Alternative 1	Alternative 2 (Preferred Alternative)	No-Action Alternative
	Essential Fish Habitat	No substantial adverse effect	No substantial adverse effect	No substantial adverse effect
Water Resources		NEPA: Long-term, less-than-significant adverse impact on Tidal Bottom: Long-term, less-than-significant impact on Water Quality: Long-term, less-than-significant impact on Floodplain CWA: No Impact E.O. 11988 Floodplain No Adverse Impact E.O. 11990 Wetlands: No Impact	NEPA: Long-term, less-than-significant adverse impact on Tidal Bottom: Long-term, less-than-significant impact on Water Quality: Long term, less-than-significant impact on Floodplain CWA: No Impact E.O. 11988 Floodplain No Adverse Impact E.O. 11990 Wetlands: No Impact	Long-term, less-than-significant impact on Water Quality CWA: No Impact E.O. 11988 Floodplain No Impact E.O. 11990 Wetlands: No Impact
Coastal Policies and Resources		CZMA: Consistent to the Maximum Extent Practicable	CZMA: Consistent to the Maximum Extent Practicable	CZMA: No Impacts
Cultural Resources		NEPA: Long-term, less-than-significant adverse impact NHPA: Adverse Effect	NEPA: Long-term, less-than-significant adverse impact NHPA: Adverse Effect	NEPA: No Impact NHPA: No Effect

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Table 6-1 provides the list of individuals who contributed to the preparation of this document:

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7 CONSULTATION AND COORDINATION

NEPA regulations require that federal, state, and local agencies with jurisdiction or special expertise regarding environmental impacts be consulted and involved in the NEPA process. The individuals and agencies listed in **Table 7-1** were contacted during the preparation of this EA.

Table 7-1: Consultation and Coordination List

Affiliation	Point of Contact	Mailing Address and Phone Number
United States Fish and Wildlife Service	Sam D. Hamilton, Director	USFWS Southeast Regional Office 1875 Century Blvd. Atlanta, GA 30345 (404) 679-4000
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Catawba Indian Nation	Dr. Wenonah Haire, THPO	1536 Tom Steven Road Rock Hill, SC 29730
Coushatta Tribe of Louisiana	Dr. Linda Langley, THPO	P.O. Box 10 Elton, LA 70532
Kialegee Tribal Town	Mr. David Cook, Tribal Administrator	P.O. Box 332 Wetumka, OK 74883
Miccosukee Tribe of Indians	Mr. Billy Cypress, Chairman	Tamiami Station P.O. Box 440021 Miami, FL 33144
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APPENDIX A

Agency Consultation and Public Involvement

NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT AND NATIONAL HISTORIC PRESERVATION ACT SECTION 106 CONSULTATION PUBLIC COMMENT FOR THE U.S. COAST GUARD STATION TYBEE STATION REBUILD PROJECT AT U.S. COAST GUARD STATION TYBEE, COCKSPUR ISLAND, CHATHAM COUNTY, GEORGIA

The U.S. Coast Guard (USCG) has prepared a Draft Environmental Assessment (EA) that evaluates a proposal to rebuild hurricane-damaged facilities at USCG Station Tybee (Station) in Chatham County, Georgia by demolishing existing onshore facilities and constructing a new Multi-Mission Station Facility. The USCG proposal also includes repair of shoreline riprap at the Station and upgrade of existing water supply and wastewater treatment systems, as well as construction or upgrade of a boat ramp for use by the USCG.

The Proposed Action will take place on the west end of Cockspur Island on lands owned by the National Park Service (NPS) that are located within the boundaries of the Fort Pulaski National Monument (PARK). Preliminary planning and evaluation led the USCG to a determination that the Proposed Action may adversely affect this National Register-listed District through increases in the height and scale of the new multi-purpose Station building, and the potential to disturb previously unidentified buried cultural resources during construction. Careful planning of the required ground disturbing activities associated with construction and the architectural design elements and minimization of the height of the new Station have been considered and incorporated to greatly reduce or eliminate adverse impacts to the PARK.

The Draft EA provides evidence and analysis for determining whether a Finding of No Significant Impact (FONSI) is appropriate, or whether an Environmental Impact Statement (EIS) is necessary. The Draft EA presents the purpose and need for the action; describes the proposed action and alternatives; characterizes the affected environment; and provides an analysis of environmental consequences.

The Draft EA is available for public review at the Tybee Library, 405 Butler Ave, Tybee Island, GA 31328, the Islands Library, 125 Wilmington Island Rd, Savannah, GA 31410, and the Fort Pulaski National Monument Visitor Contact Station at Visitor's Center, Pulaski Rd, Cockspur Island, GA, or electronically at https://www.dcms.uscg.mil/Our-Organization/Assistant-Commandant-for-Engineering-Logistics-CG-4-/Program-Offices/Environmental-Management/Environmental-Planning-and-Historic-Preservation/.

The USCG is publishing this notice in accordance with federal regulations for the National Environmental Policy Act (NEPA) at 40 Code of Federal Regulations (CFR) Part 1501.7 and Section 106 of the National Historic Preservation Act at 36 CFR Part 800.6(a)(4). Parties interested in commenting on the EA or the project's potential effects on cultural or historic properties are respectfully invited to provide comments to: USCG Facilities Design and Construction Center, ATTN: Richard Hylton, 5505 Robin Hood Road, Suite K, Norfolk, VA 23513 or via electronic mail at Rick.D.Hylton@uscg.mil within 30 days of publication of this notice.

Savannah Morning News, January 6, 2021

NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT AND NATIONAL HISTORIC PRESERVATION ACT SECTION 106 CONSULTATION PUBLIC COMMENT FOR THE U.S. COAST GUARD STATION TYBEE STATION REBUILD PROJECT AT U.S. COAST GUARD STATION TYBEE, COCKSPUR ISLAND, CHATHAM COUNTY, GEORGIA

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Yoga Teacher Training

24 Day Intensive Yoga Teacher Training. Think you've got what it takes to teach yoga? Our yoga teacher training intensive is a life and body transformational experience. Savannah Yoga Center has been offering programs since 2007 and graduated over 200 students. Visit www.savannahyoga.com or call 912-232-2994

to open our second SBA WBC in Savannah – our cal-assistance.

Name Change Announcement

Current name: Aaliyah Marie Nebergall
Desired name: Raissa Mariza Nebergall
The court hearing the petition: Chatham County Superior Court
The petition's filing date: January 2, 2021
Objections to my name change may be filed with the aforementioned court.

NOTICE OF AVAILABILITY

Draft Environmental Assessment and National Historic Preservation Act Section 106 Consultation Public Comment for The U.S. Coast Guard Station Tybee Station Rebuild Project at U.S. Coast Guard Station Tybee, Cockspur Island, Chatham County, Georgia

The U.S. Coast Guard (USCG) has prepared a Draft Environmental Assessment (EA) that evaluates a proposal to rebuild hurricane-damaged facilities at USCG Station Tybee (Station) in Chatham County, Georgia by demolishing existing onshore facilities and constructing a new Multi-Mission Station Facility. The USCG proposal also includes repair of shoreline riprap at the Station and upgrade of existing water supply and wastewater treatment systems, as well as construction or upgrade of a boat ramp for use by the USCG.

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

AUG 0 3 2020

11000

Mr. Shawn Gillen, City Manager
City of Tybee Island
403 Butler Ave
Tybee Island, GA 31328

Greetings Mr. Gillen,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land owned by the National Park Service (NPS). This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG plans to recapitalize the Station with modern facilities that meet today's standards, better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

The scope of work for the proposed project includes replacing the existing Station and support buildings with a new multi-mission building and repairing stone rip-rap along the Station shoreline. Related site work will include upgrading/replacing the wastewater treatment system, repairing /upgrading an existing NPS boat ramp, and repairing/upgrading the existing NPS potable water system that also supplies USCG STA Tybee.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the "No-Action" alternative and two rehabilitation options, which are described by the enclosure.

Please provide any questions or comments you may have on our project no later than August 14, 2020. Mr. Richard Hylton is my representative for this project and is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance in considering and commenting on this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: (1) Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

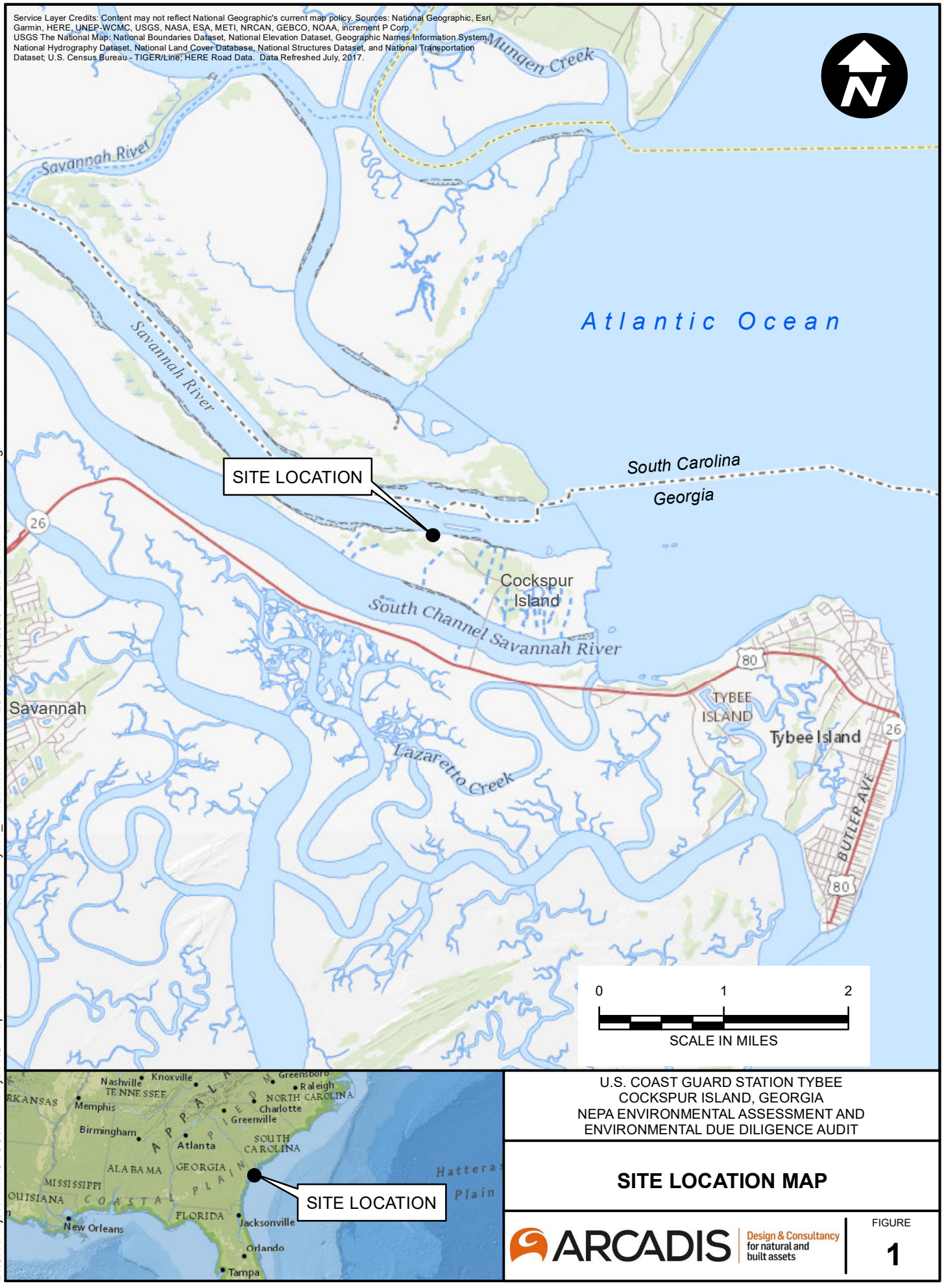
The scope of work for the proposed project includes work within the Station's existing compound area and within three additional areas outside of the compound as follows:

1. **Existing Compound Area** - Replace the existing Station and support buildings with a new multi-mission building, repair the stone rip-rap along the Station shoreline, complete major site work, to include reconfiguring parking areas and internal Station roads, and make major upgrades to utilities.
2. **Area A** - Located to the immediate southeast of the Existing Station; upgrade/replace the existing wastewater treatment system.
3. **Area B** - Located east of the Station compound, repair and upgrade an existing NPS boat ramp to accommodate USCG boats.
4. **Area C** - Located south of the Station compound; repair and upgrade the existing potable groundwater system. This will include constructing a new pump house.

The general project site and specific work areas are shown on the attached **Figure 1** and **Figure 2**.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the following three alternative actions:

1. ***No Action Alternative*** - This alternative would retain existing facilities (buildings and piers) at USCG Station Tybee for indefinite continued use. Continued necessary repairs would be provided, but no additional space would be constructed, and no major reconfiguration of existing space would be performed.
2. ***Rehabilitation Option 1*** - The USCG would complete all rehabilitation within the existing USCG compound, including construction of a new multi-mission building, repairs to the wastewater system, repairs to the drinking water system, and realignment of parking and roads within the compound. A new boat ramp would be constructed adjacent to the existing USCG Station Tybee pier.
3. ***Rehabilitation Option 2 (Proposed Project)*** - Same as Option 1, except the USCG would slightly enlarge the existing NPS boat ramp east of USCG Station Tybee for use by the USCG and make improvements to the nearby NPS potable water system. Additionally, the USCG would upgrade the current wastewater treatment system operated by the NPS to serve USCG STA Tybee. With this option, a more efficient facility layout is possible, while minimizing environmental impacts.



U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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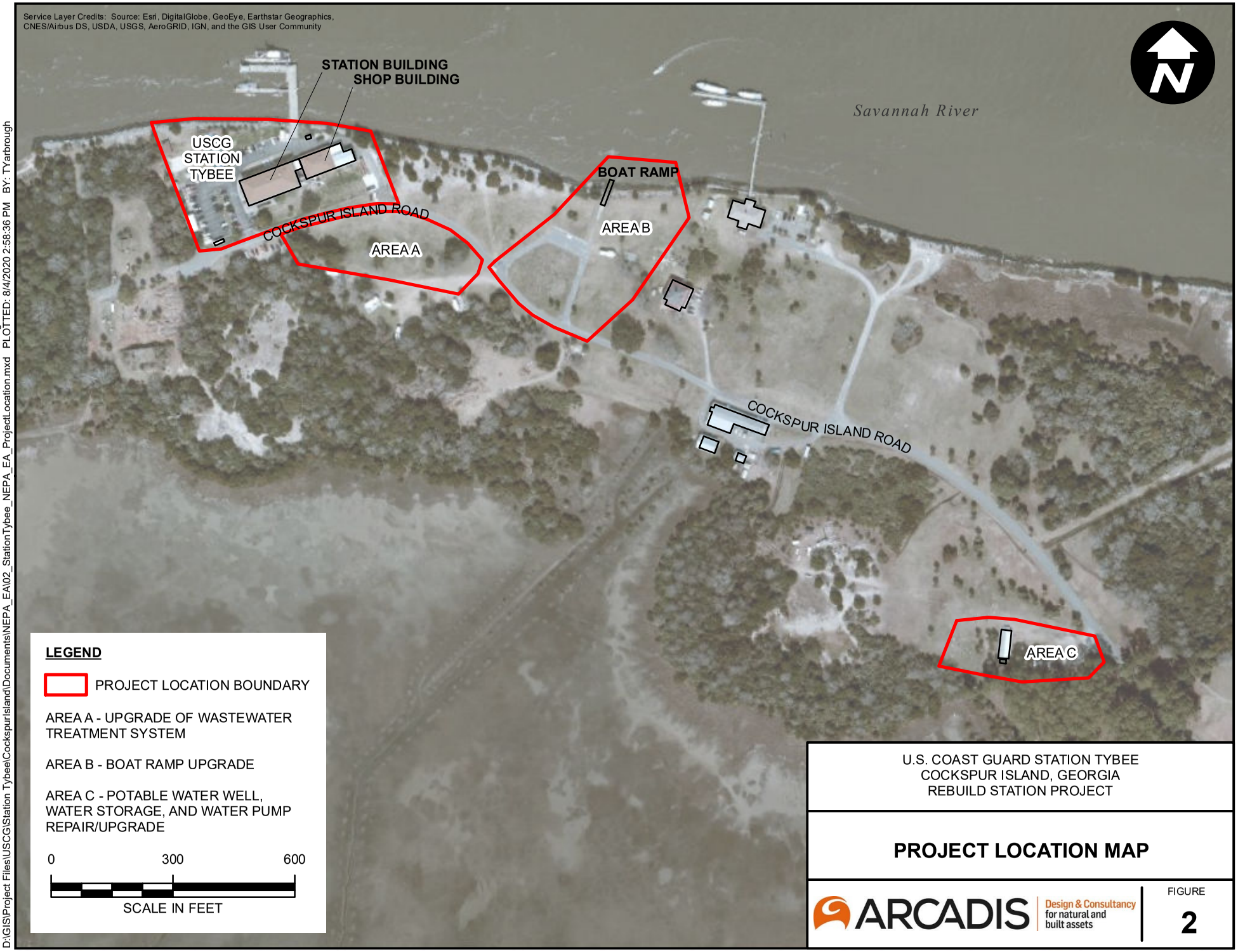

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Dr. Paul Backhouse, THPO
Attention: THPO Compliance Review, Bradley Mueller, Victoria Menchaca
30290 Josie Billie Hwy, PMB 1004
Clewiston, FL 33440

Greetings,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

The scope of work for the proposed project includes: replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station shoreline, and major site work; upgrading/replacing the NPS wastewater treatment system; repairing /upgrading the NPS boat ramp; and. repairing/upgrading the NPS existing potable water system.

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Please provide any questions or comments you may have on our project no later than September 10, 2020. Mr. Richard Hylton is my representative for this project and is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance with this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

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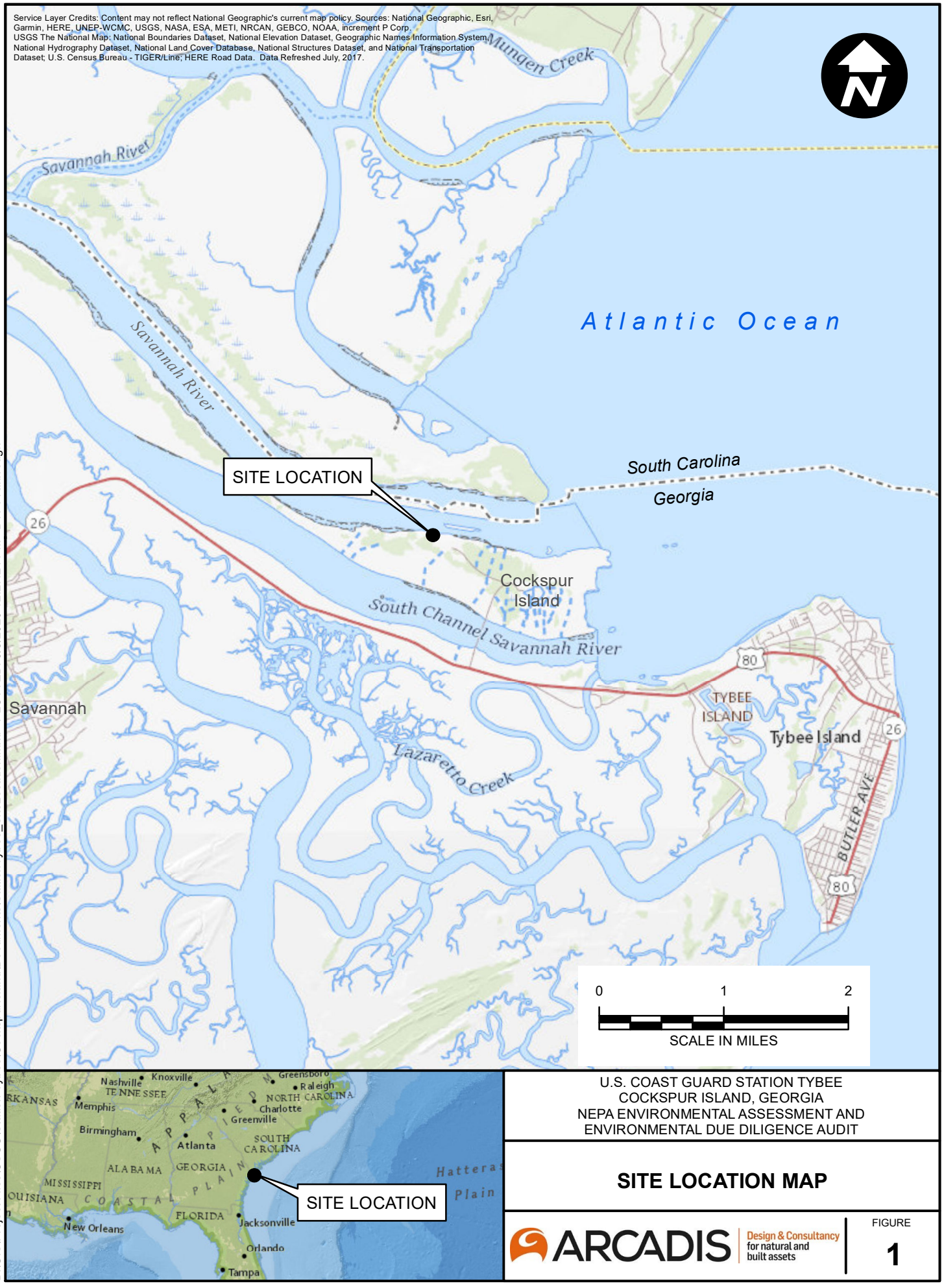

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
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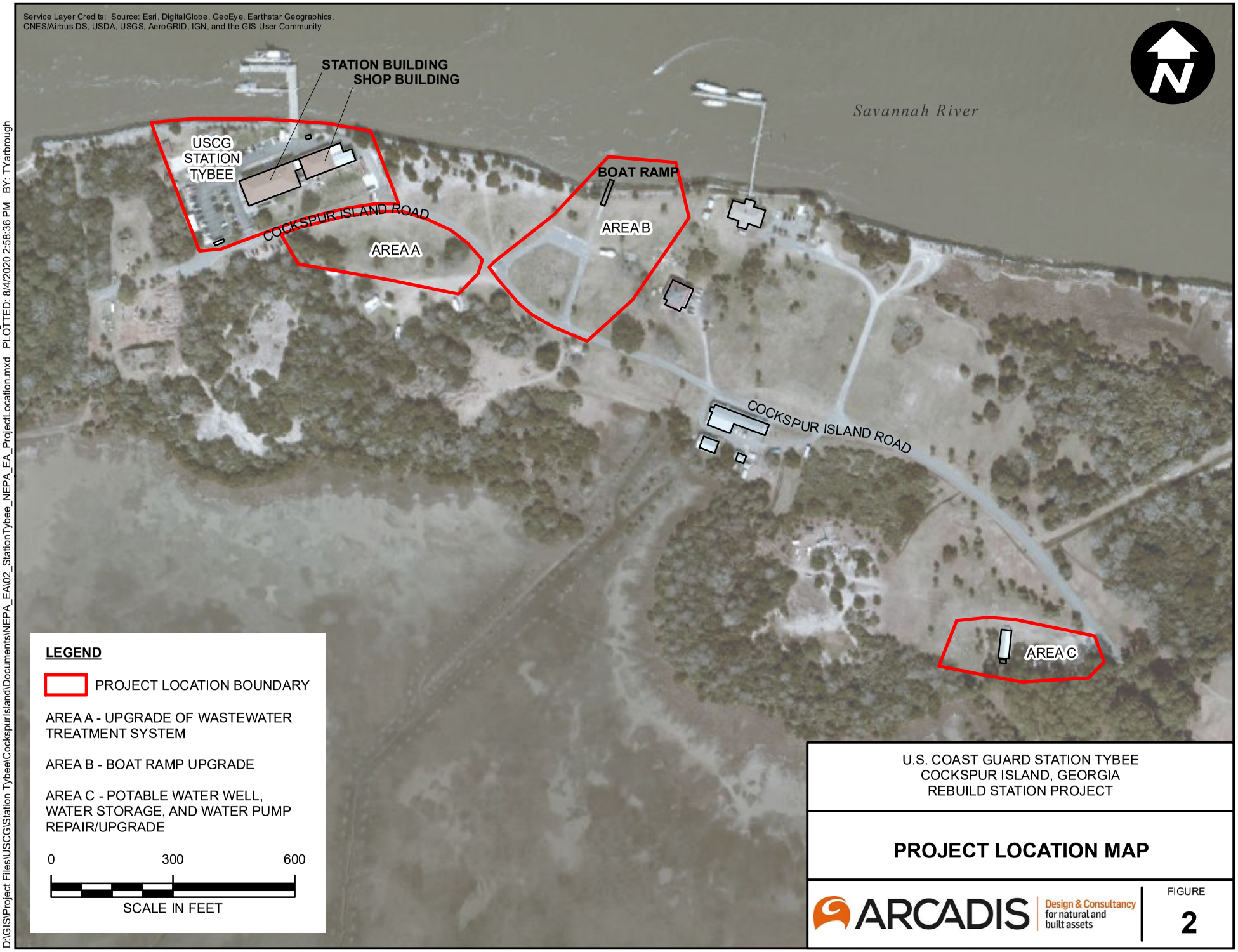

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Rusty Garrison, Director
Wildlife Resources Division
Georgia Department of Natural Resources
2067 US Highway 278 SE
Social Circle, GA 30025

Greetings Mr. Garrison,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Sincerely,

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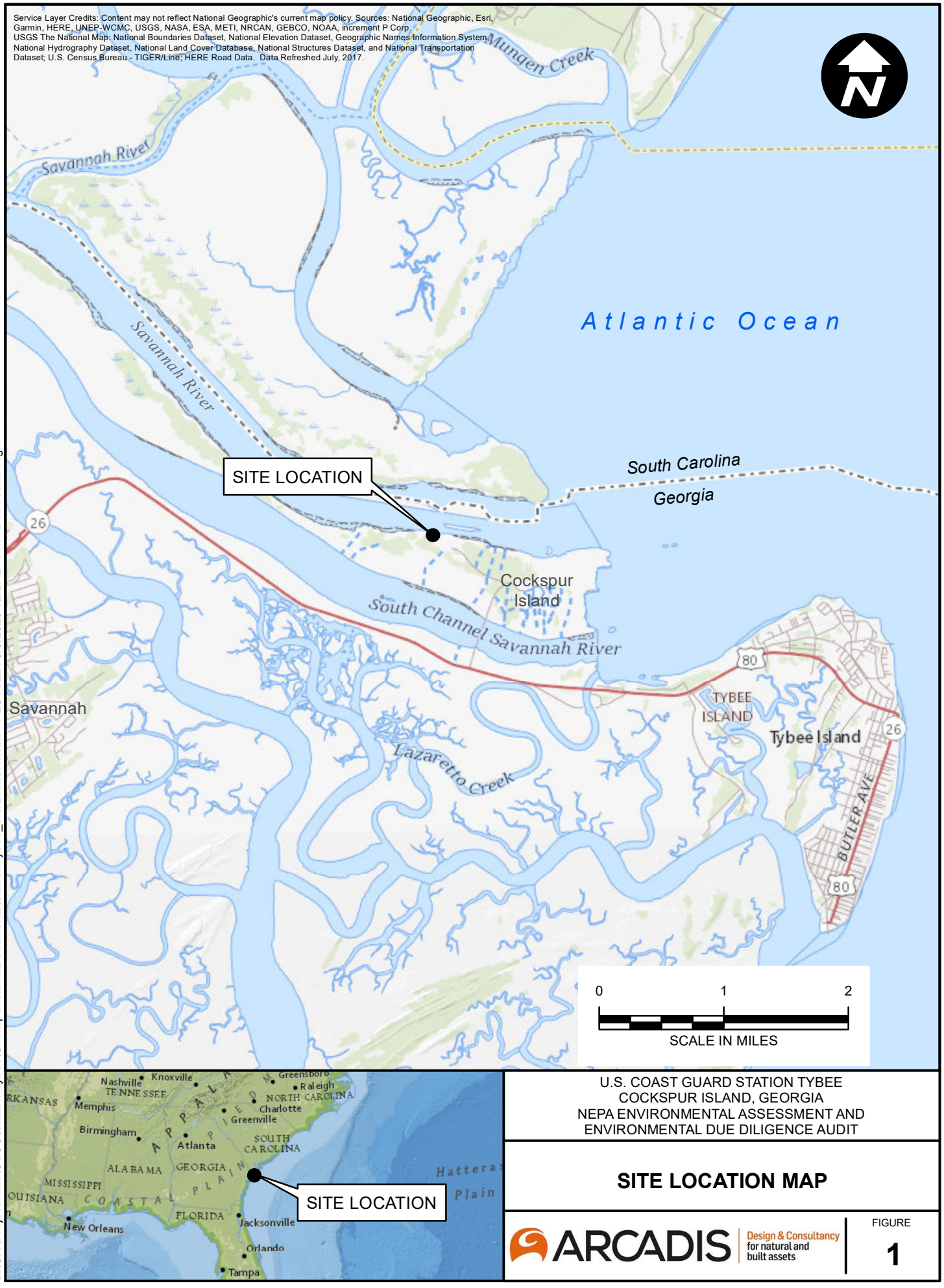

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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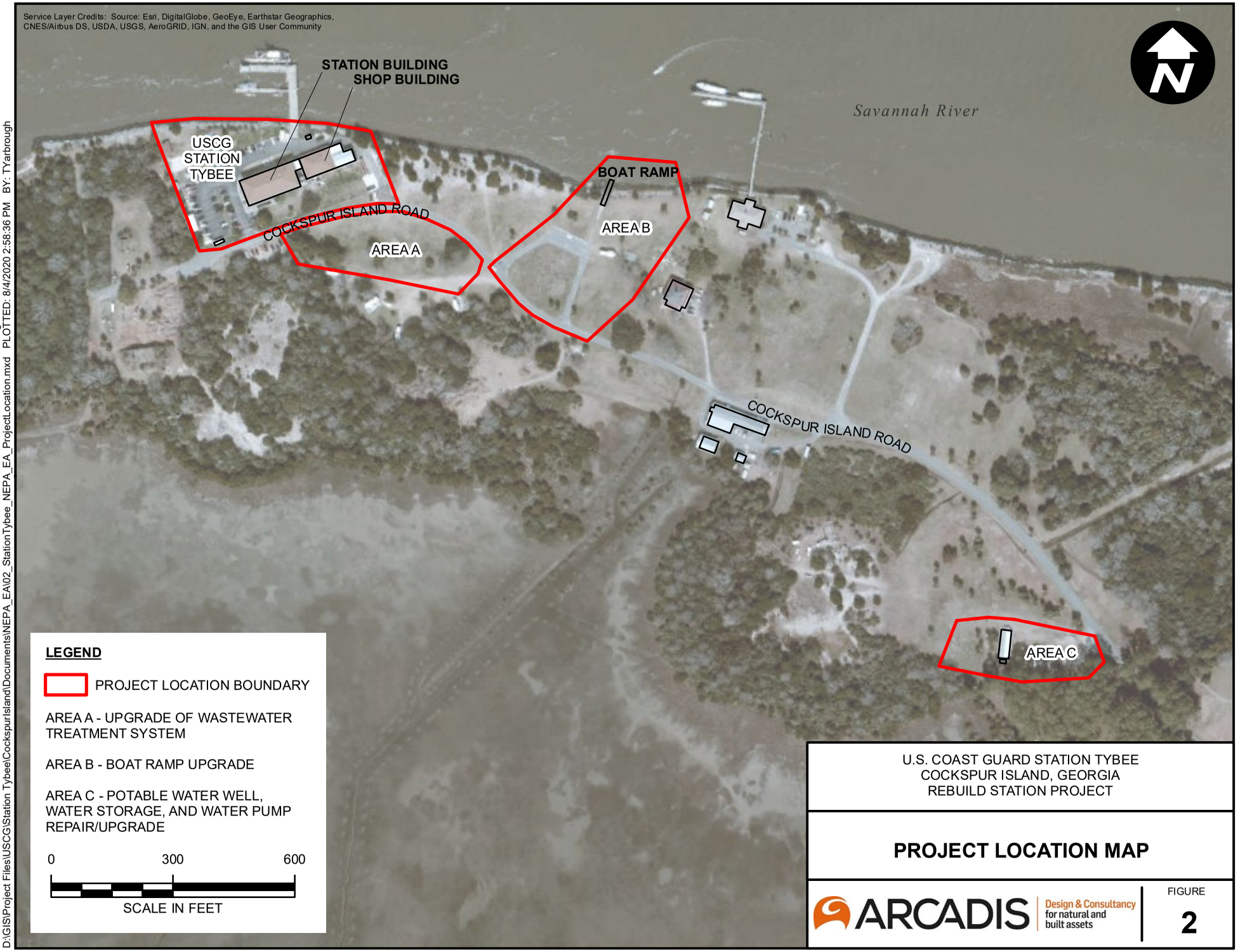

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

AUG 25 2020

Leopoldo Miranda, Director
USFWS Southeast Regional Office
1875 Century Blvd.
Atlanta, GA 30345

Greetings Mr. Miranda,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

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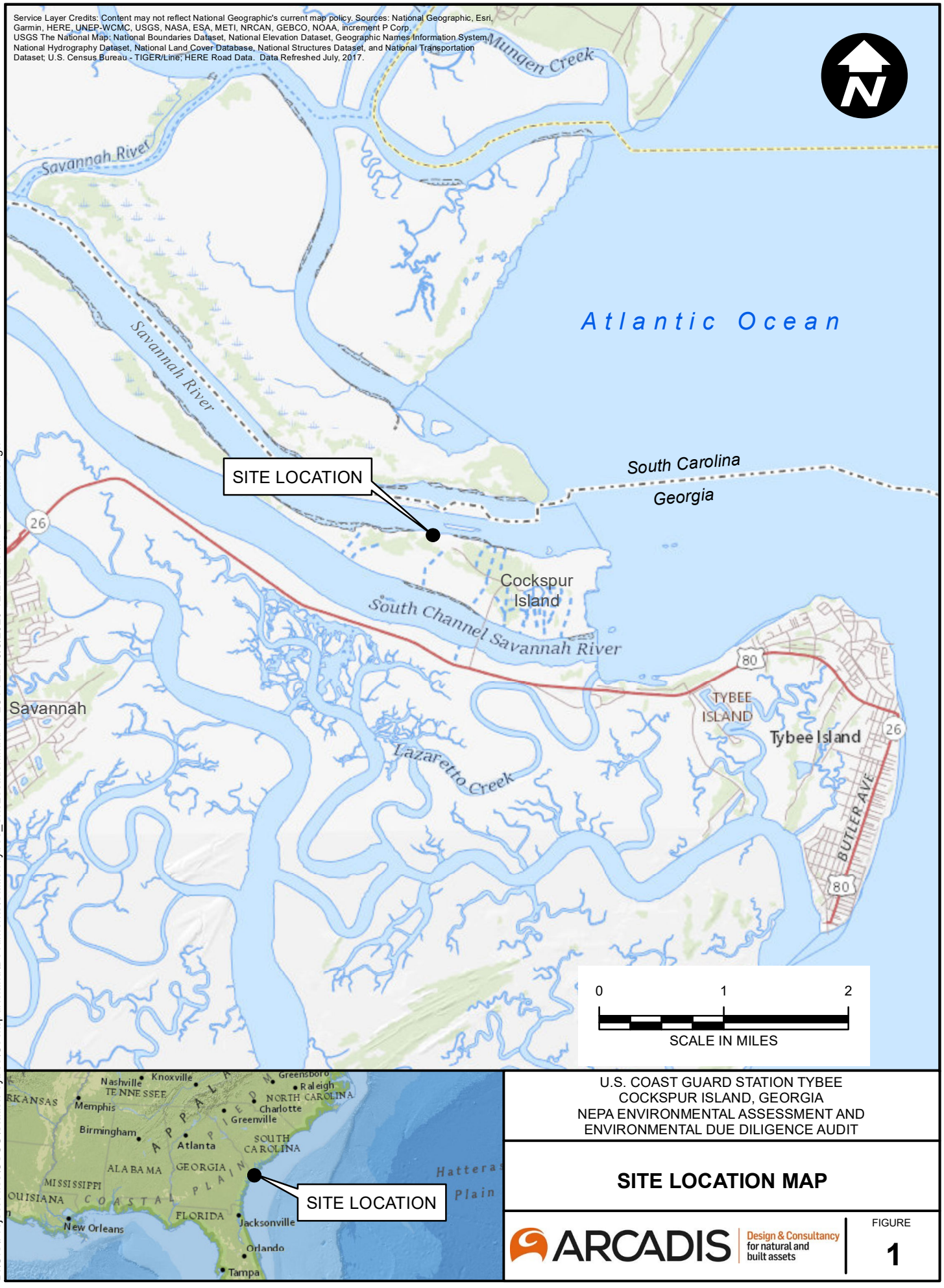

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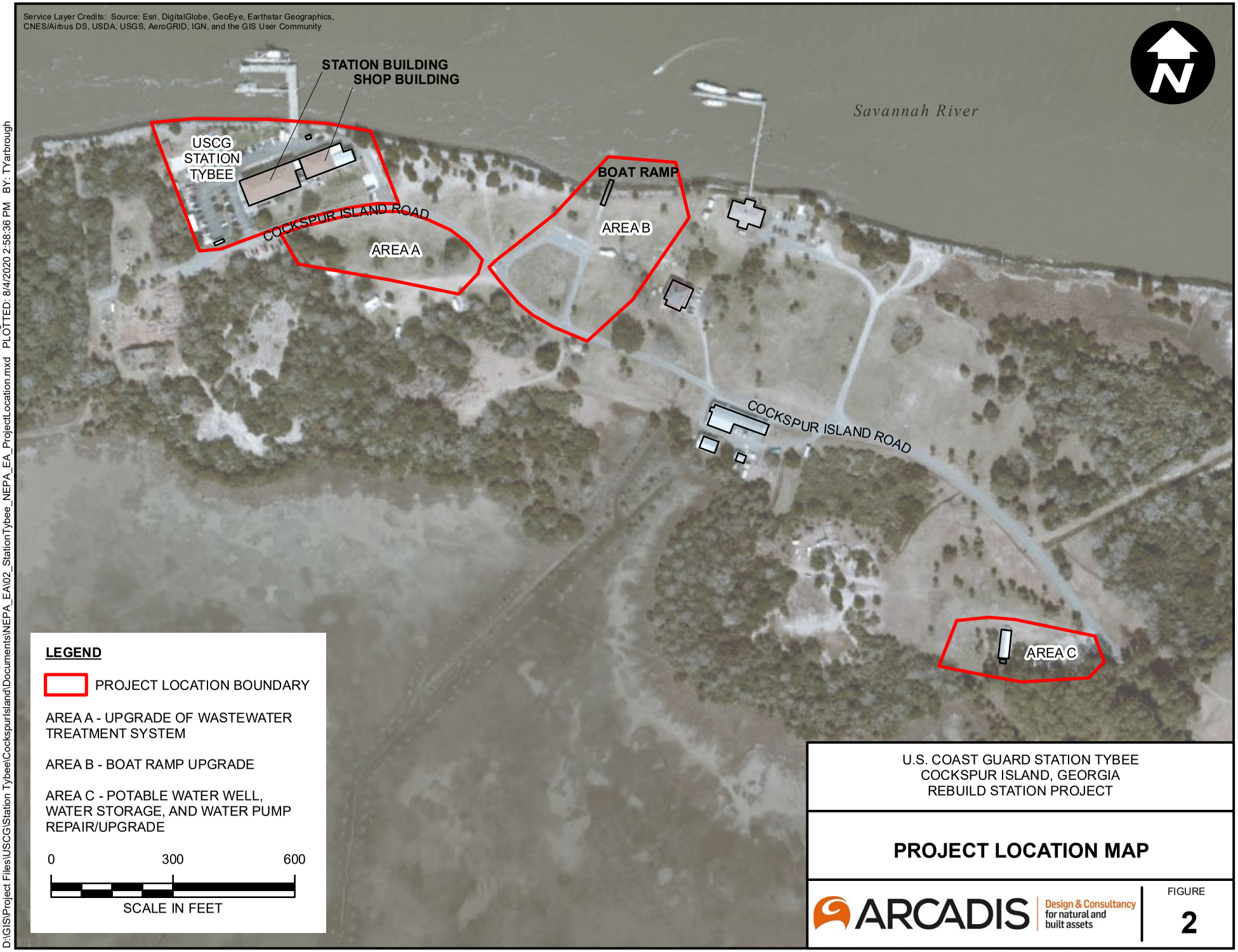

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COCKSPUR ISLAND, GEORGIA
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Phone: 757-852-3404
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11000
AUG 25 2020

William M. Rutlin
Chief, Coastal Branch Regulatory Division
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Ave.
Savannah, GA 31402

Greetings Mr. Rutlin,

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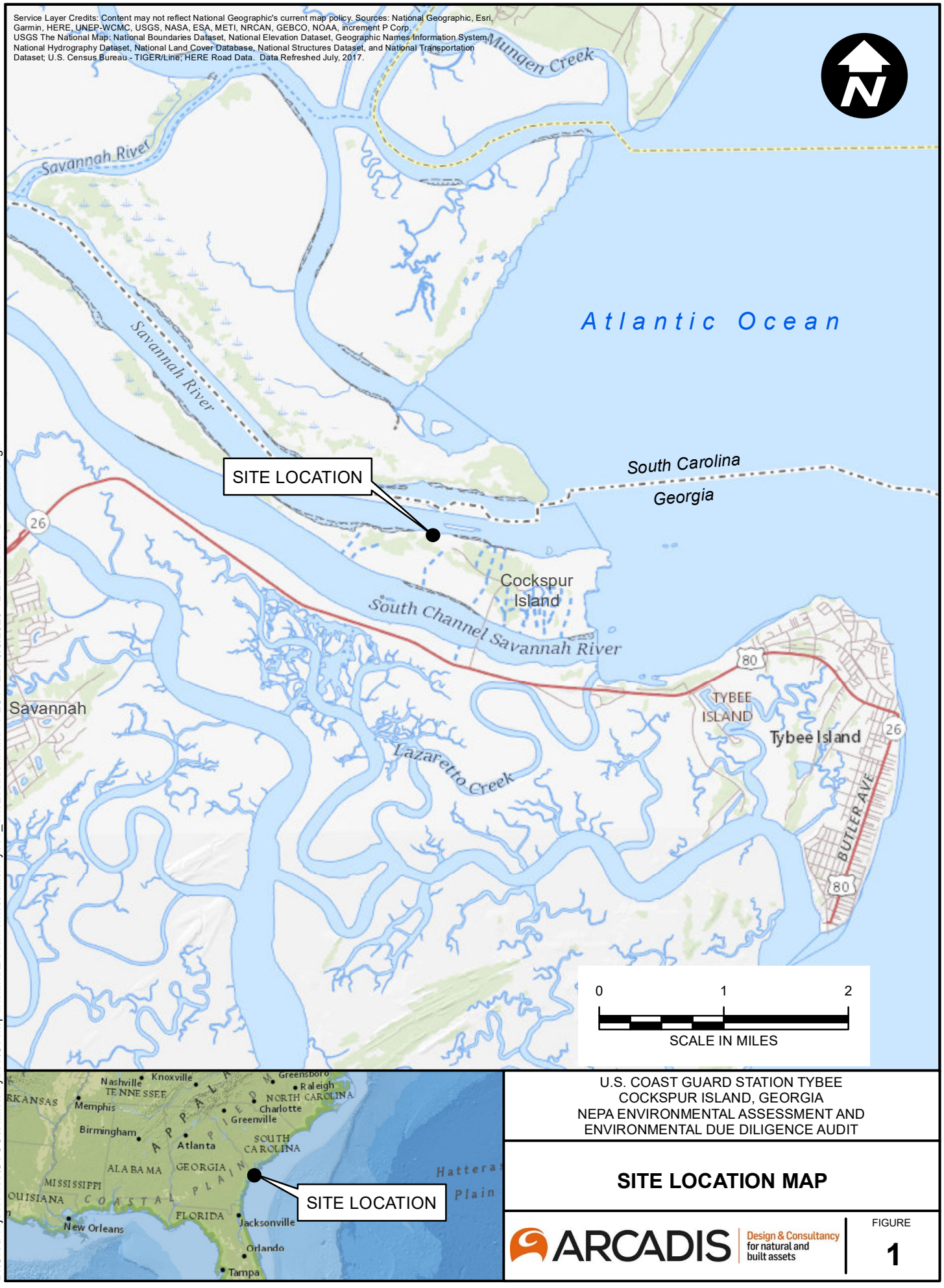

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
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ARCADIS Design & Consultancy for natural and built assets

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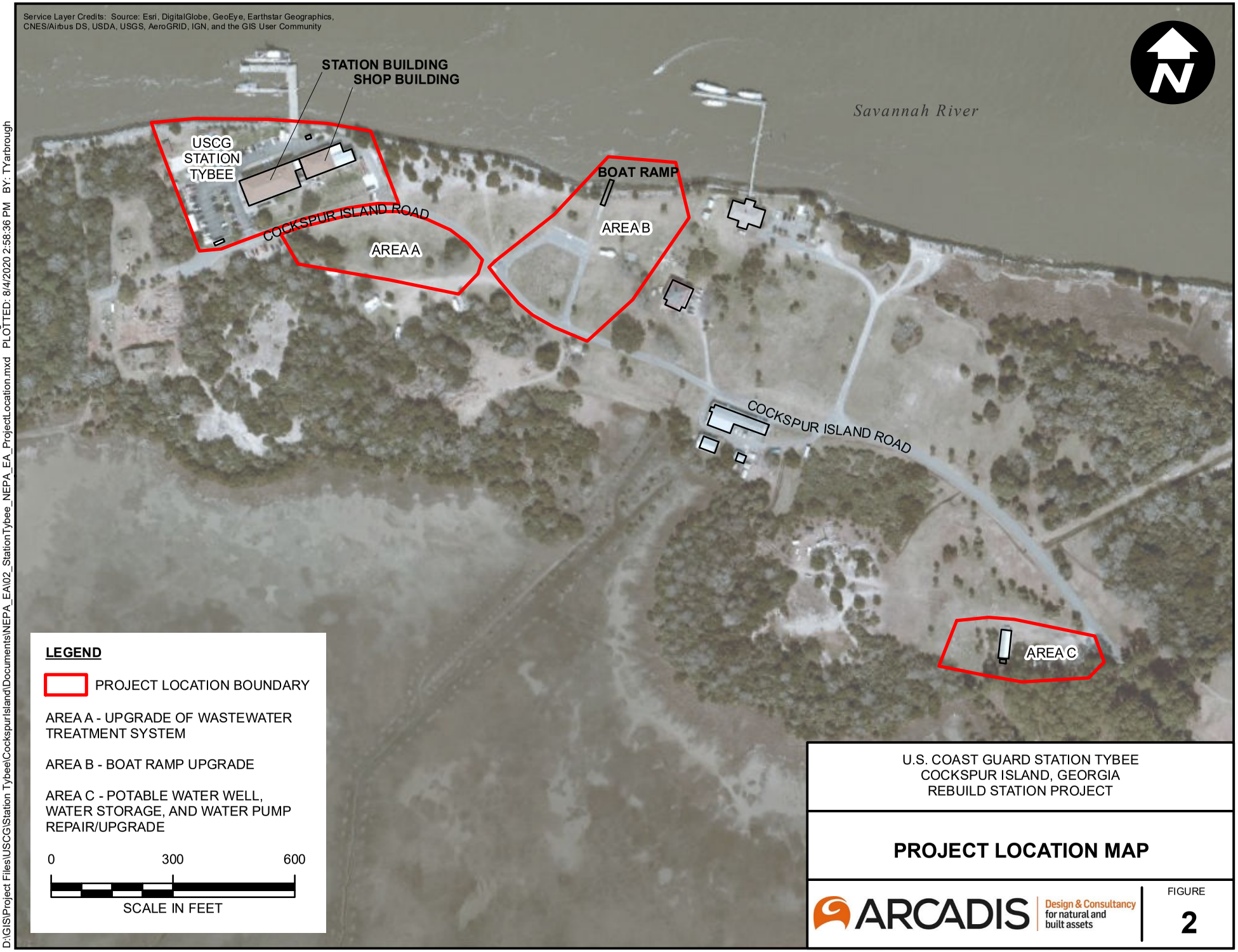

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FIGURE
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U.S. Department of Homeland Security
United States Coast Guard

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Terrance O. Rudolph, State Conservationist
National Resources Conservation Service
355 E. Hancock Ave., Mail Stop 200
Athens, GA 30601

Greetings Mr. Rudolph,

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Captain, U. S. Coast Guard

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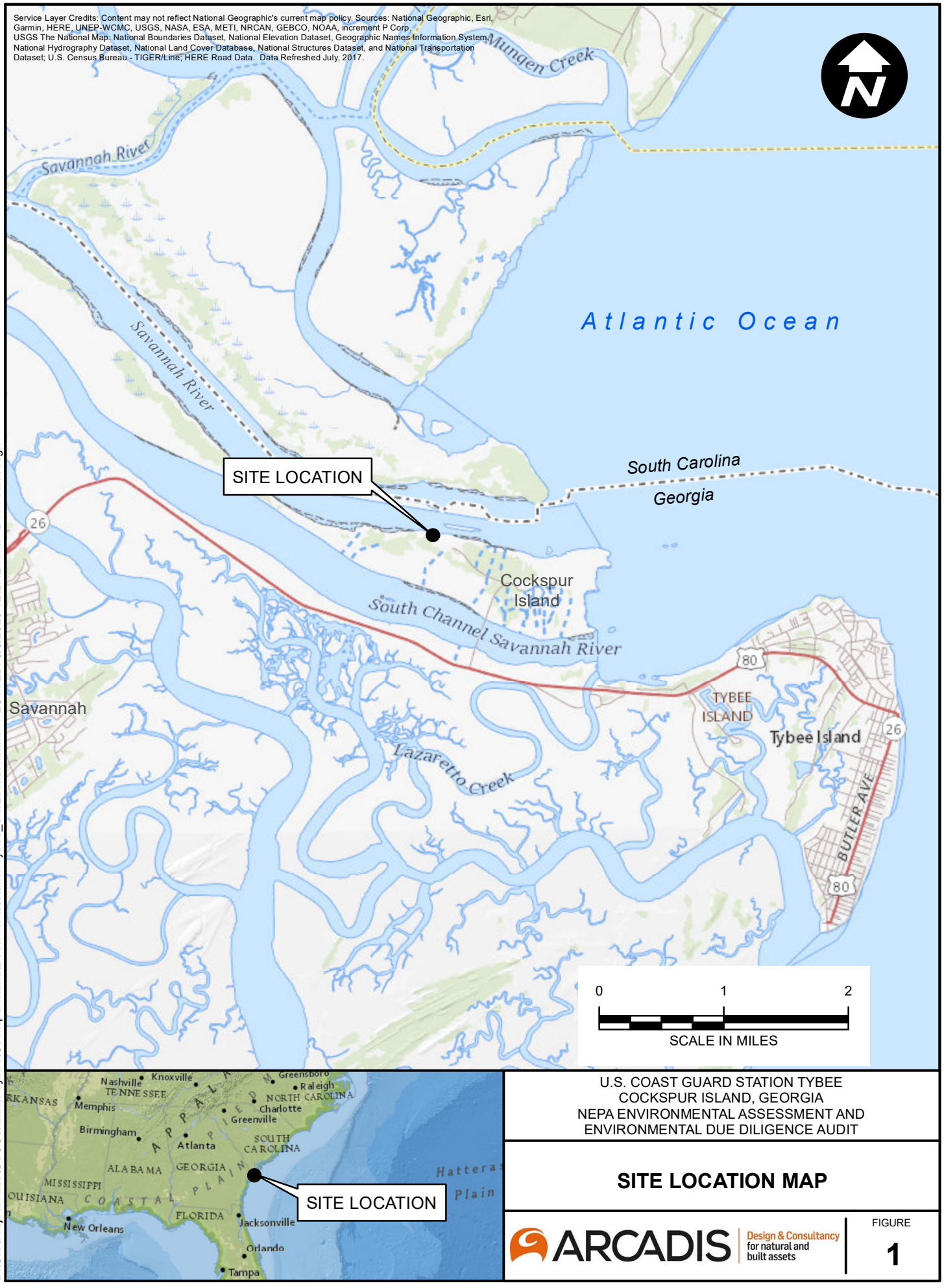

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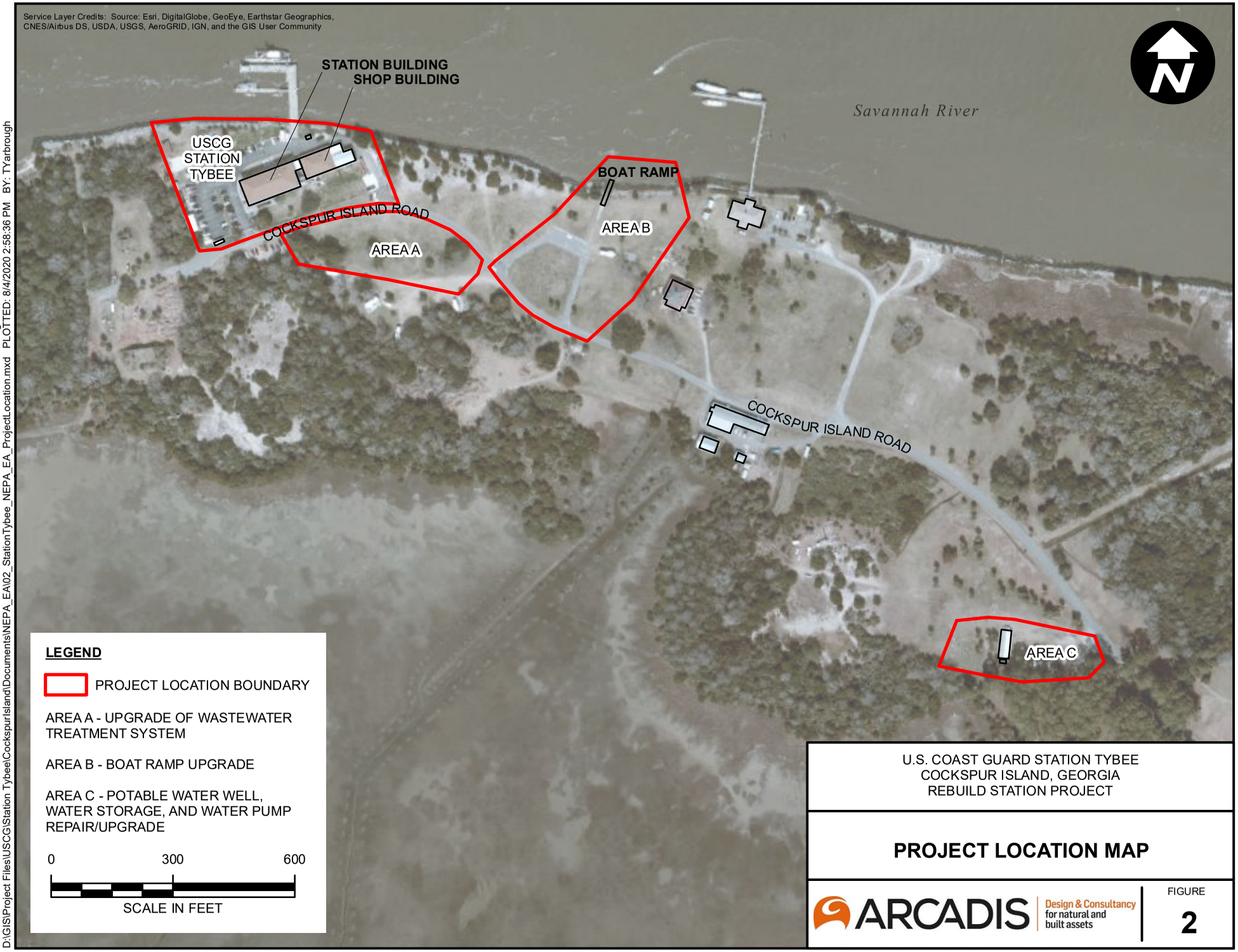

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COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

USDA
United States Department of Agriculture

October 30, 2020

J. F. Barresi
Captain, US Coast Guard
5505 Robin Hood Road, Suite K
Norfolk, BA 23513

Re: EO12372 Request for US Coast Guard Station Tybee Renovations, Chatham County

Dear Captain Barresi:

This letter is in reference to your request for information on the possible impacts the proposed coast guard station renovation project may have on land use, conservation, water quality and other general environmental concerns that may be of interest to our agency. The following outlines our concerns with the proposed project with regards to farmland protection, and Natural Resources Conservation Service (NRCS) watershed dams and project easements.

Farmland Protection

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes areas located within soil map units rated as prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land uses, but not water or urban built-up land. It should be noted that the FPPA does not authorize the Federal Government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. It is our understanding that the proposed project involves federal funds or assistance, and thus could be subject to this assessment. However, this project does not convert prime farmland and is thus exempt from this assessment. You need take no further action for FPPA purposes.

NRCS Watershed Dams

More than 50 years ago, the U.S. Department of Agriculture was authorized by Congress to help local communities with flood control and watershed protection through the Watershed Program (PL-534 Flood Control Act of 1944 and PL-566 Watershed Protection and Flood Prevention

Act). As a result, local communities, with NRCS assistance, have constructed over 11,000 dams in 47 states since 1948. These dams were originally constructed for protection of farmlands from flooding impacts. In 2000, PL-566 was amended to provide NRCS authorization to assist communities with rehabilitation of their aging dams. The legislation authorizes NRCS to work with local communities and watershed project sponsors to address public health and safety concerns and potential environmental impacts of aging dams.

We have reviewed our records and have determined that there are no such structures downstream and/or in the vicinity of the proposed project that could be affected by these activities.

NRCS Easements

NRCS easements relate to our Wetland Reserve Program and the Farm and Ranchland Protection Program. **We have reviewed our records and have determined that there are no such easements downstream or in the near vicinity of the proposed project that could be affected by these activities.**

NRCS appreciates this opportunity to comment. If you have questions or need any additional information, please contact me at dan.wallace@usda.gov.

Sincerely,

DANIEL F. WALLACE
STATE RESOURCE INVENTORY COORDINATOR

cc: David Walden, Assistant State Conservationist (FO), NRCS, Baxley, GA
Chelsea Cutler, District Conservationist, NRCS, Richmond Hill, GA
Casey Sowell, Area Resource Soil Scientist, NRCS, Statesboro, GA

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

David M. Bernhart, Assistant Regional Administrator
National Marine Fisheries Service
Protected Resources Division
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Greetings Mr. Bernhart,

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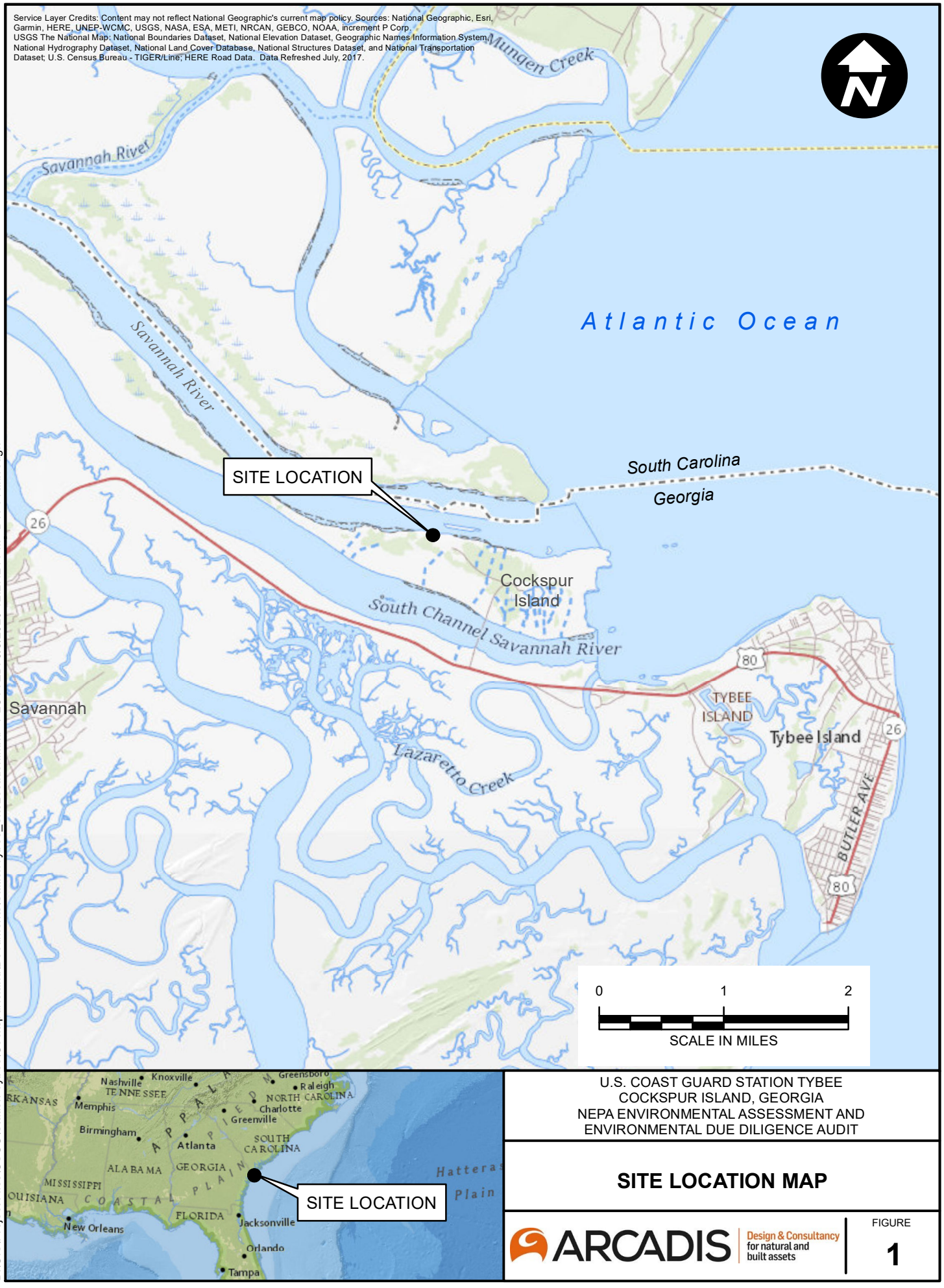

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

CITY: NOVI, MI DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: 30049571 COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
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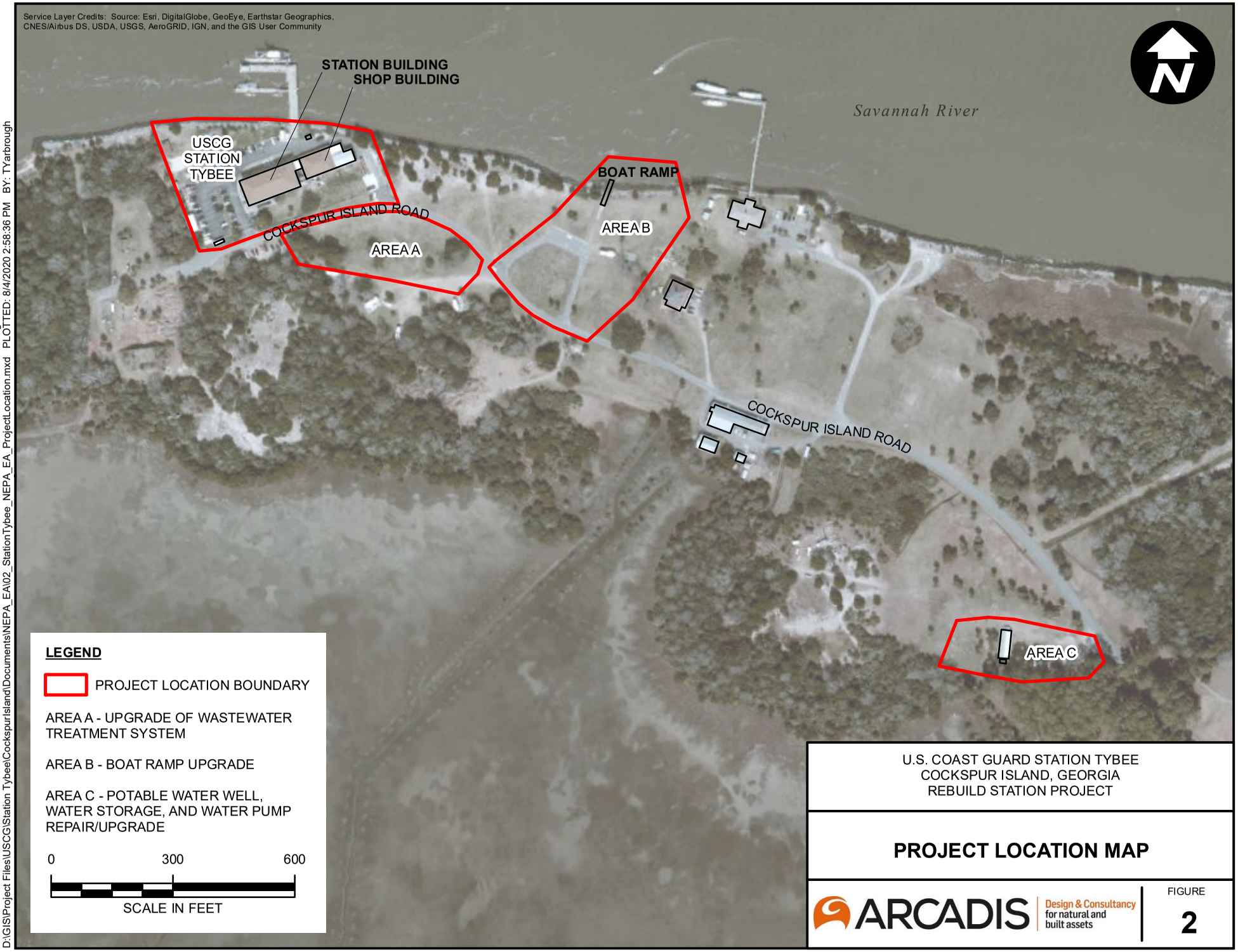

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Virginia Fay, Assistant Regional Administrator
National Marine Fisheries Service
Habitat Conservation Division
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Greetings Mrs. Fay,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

The scope of work for the proposed project includes: replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station shoreline, and major site work; upgrading/replacing the NPS wastewater treatment system; repairing /upgrading the NPS boat ramp; and. repairing/upgrading the NPS existing potable water system.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the No Action Alternatives and two rehabilitation options, which are described in the enclosure.

Please provide any questions or comments you may have on our project no later than September 10, 2020. Mr. Richard Hylton is my representative for this project and is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance with this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

The scope of work for the proposed project includes work within the Station's existing compound area and within three additional areas outside of the compound as follows:

1. **Existing Compound Area** - Replace the existing Station and support buildings with a new multi-mission building, repair the stone rip-rap along the Station shoreline, complete major site work, to include reconfiguring parking areas and internal Station roads, and make major upgrades to utilities.
2. **Area A** - Located to the immediate southeast of the Existing Station; upgrade/replace the existing wastewater treatment system.
3. **Area B** - Located east of the Station compound, repair and upgrade an existing NPS boat ramp to accommodate USCG boats.
4. **Area C** - Located south of the Station compound; repair and upgrade the existing potable groundwater system. This will include constructing a new pump house.

The general project site and specific work areas are shown on the attached **Figure 1** and **Figure 2**.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the following three alternative actions:

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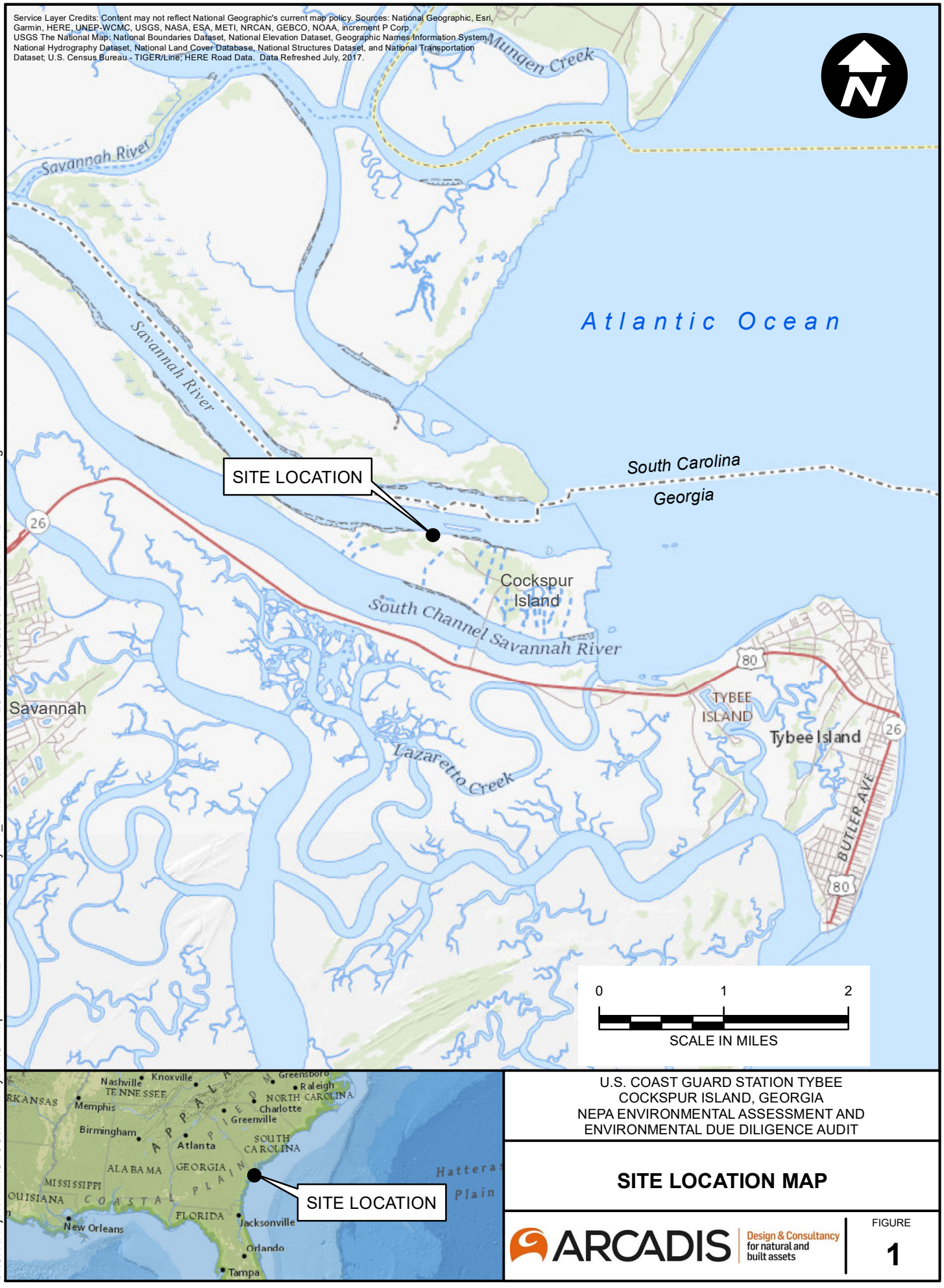
2. ***Rehabilitation Option 1*** - The USCG would complete all rehabilitation within the existing USCG compound, including construction of a new multi-mission building, repairs to the wastewater system, repairs to the drinking water system, and realignment of parking and roads within the compound. A new boat ramp would be constructed adjacent to the existing USCG Station Tybee pier.
3. ***Rehabilitation Option 2 (Proposed Project)*** - Same as Option 1, except the USCG would slightly enlarge the existing NPS boat ramp east of USCG Station Tybee for use by the USCG and make improvements to the nearby NPS potable water system. Additionally, the USCG would upgrade the current wastewater treatment system operated by the NPS to serve USCG STA Tybee. With this option, a more efficient facility layout is possible, while minimizing environmental impacts.



U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

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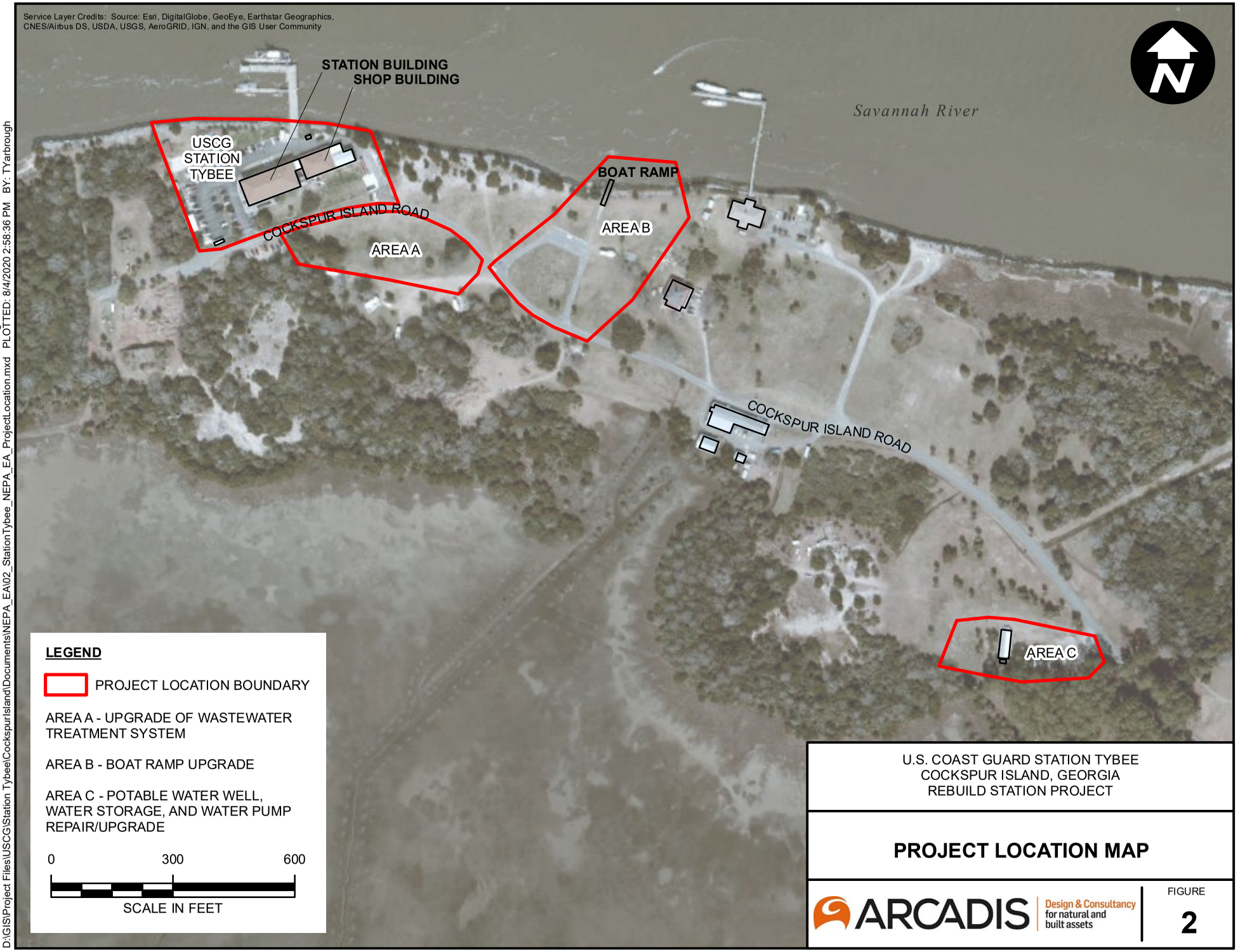

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Jennifer Dixon, Program Manager
Environmental Review & Preservation Planning
Historic Preservation Division
Georgia Department of Natural Resources
Jewett Center for Historic Preservation
2610 GA Hwy 155, SW
Stockbridge, GA 30281

Greetings Mrs. Dixon,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

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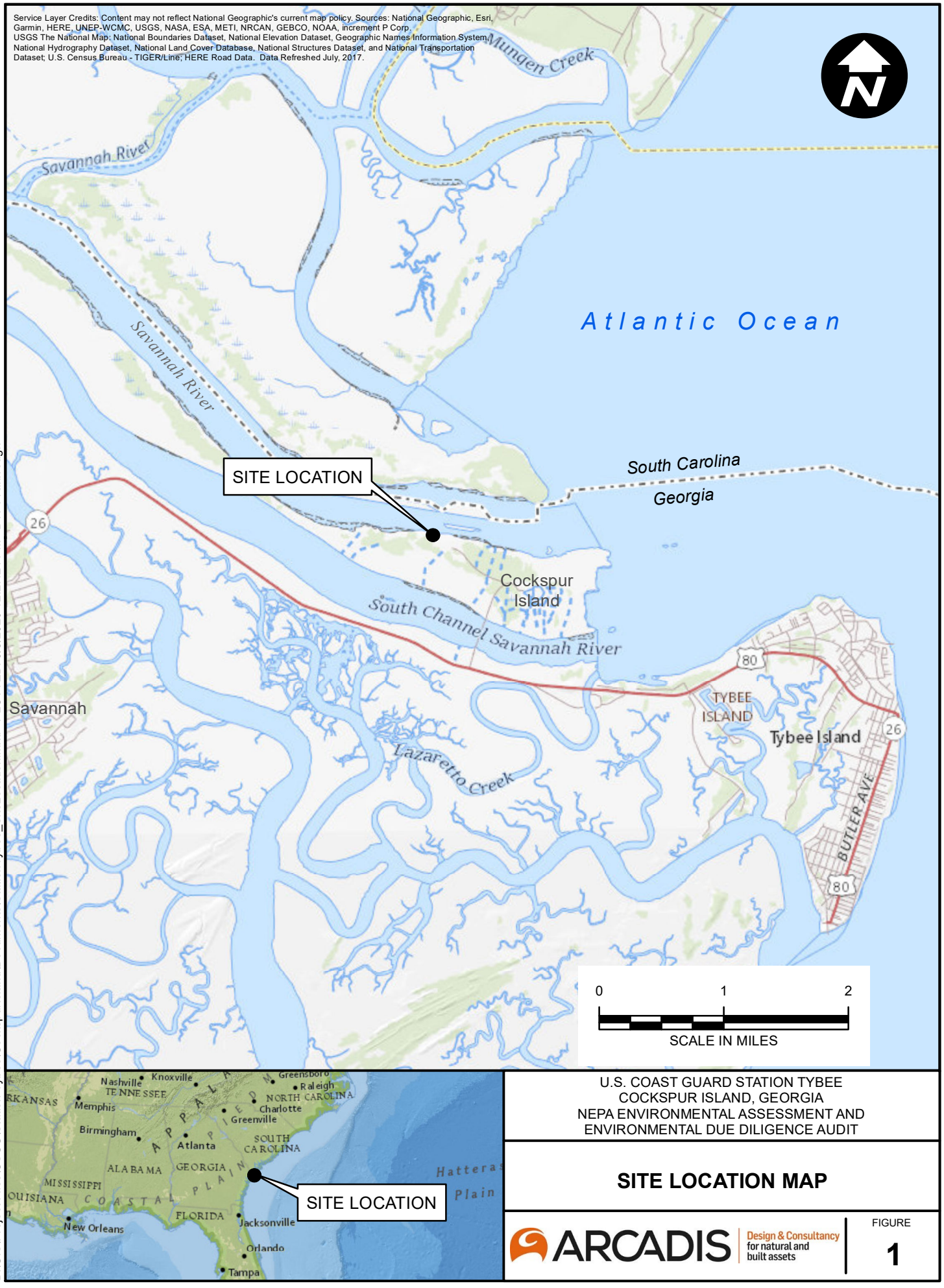

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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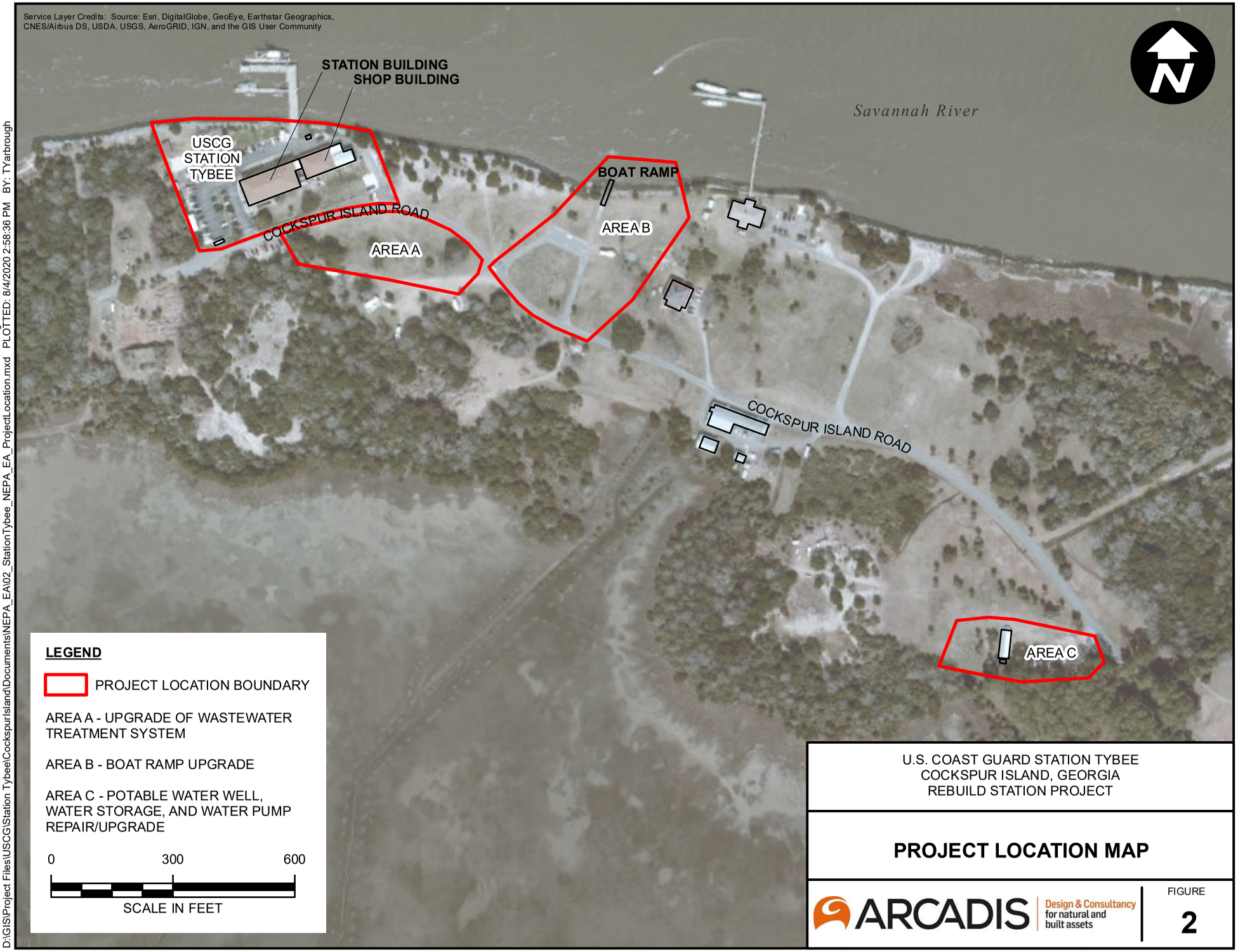

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
AUG 25 2020

Richard E. Dunn, Director
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
14th Floor East Tower - Suite 1456
Atlanta, GA 30334-9000

Greetings Mr. Dunn,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

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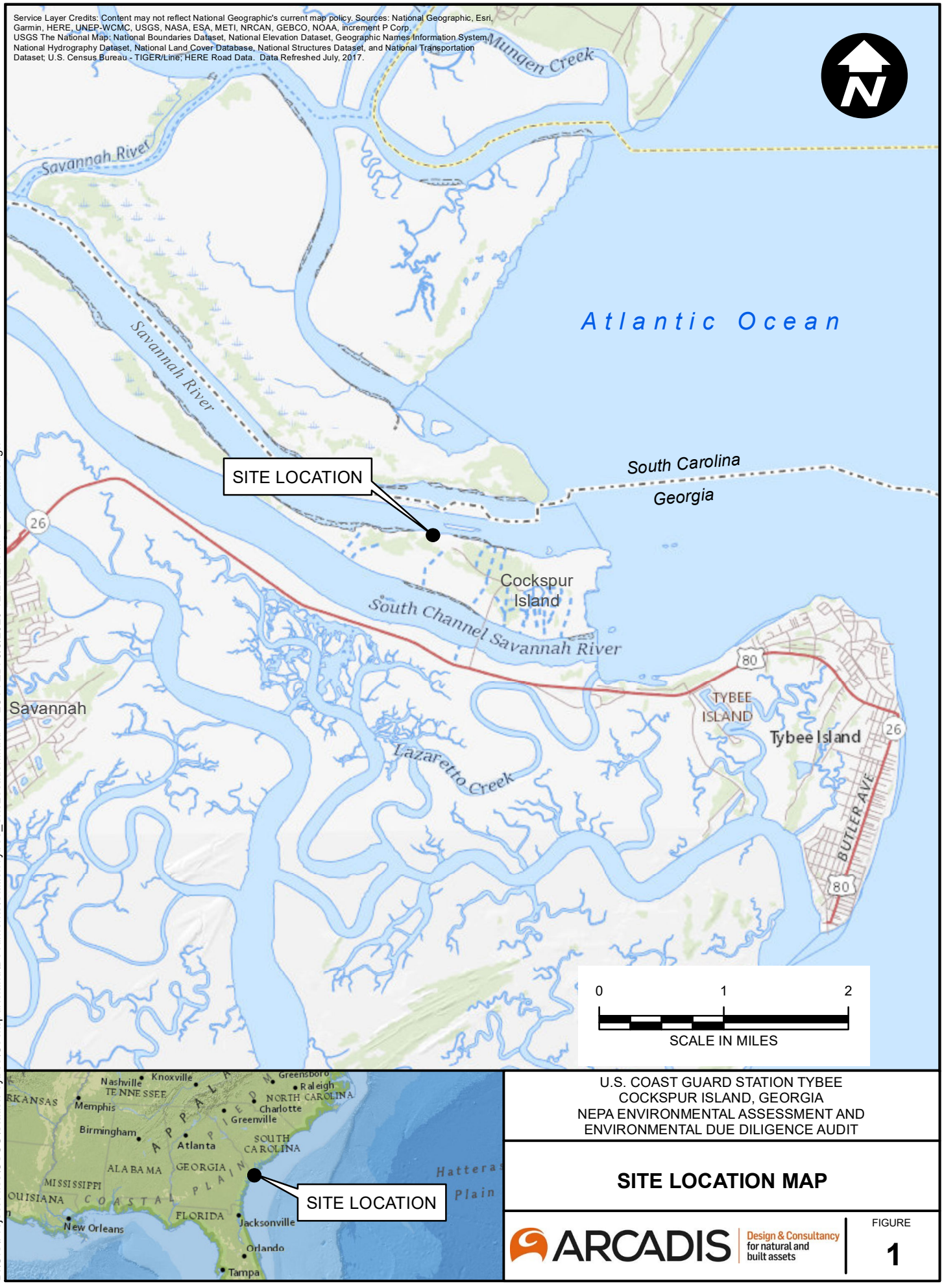

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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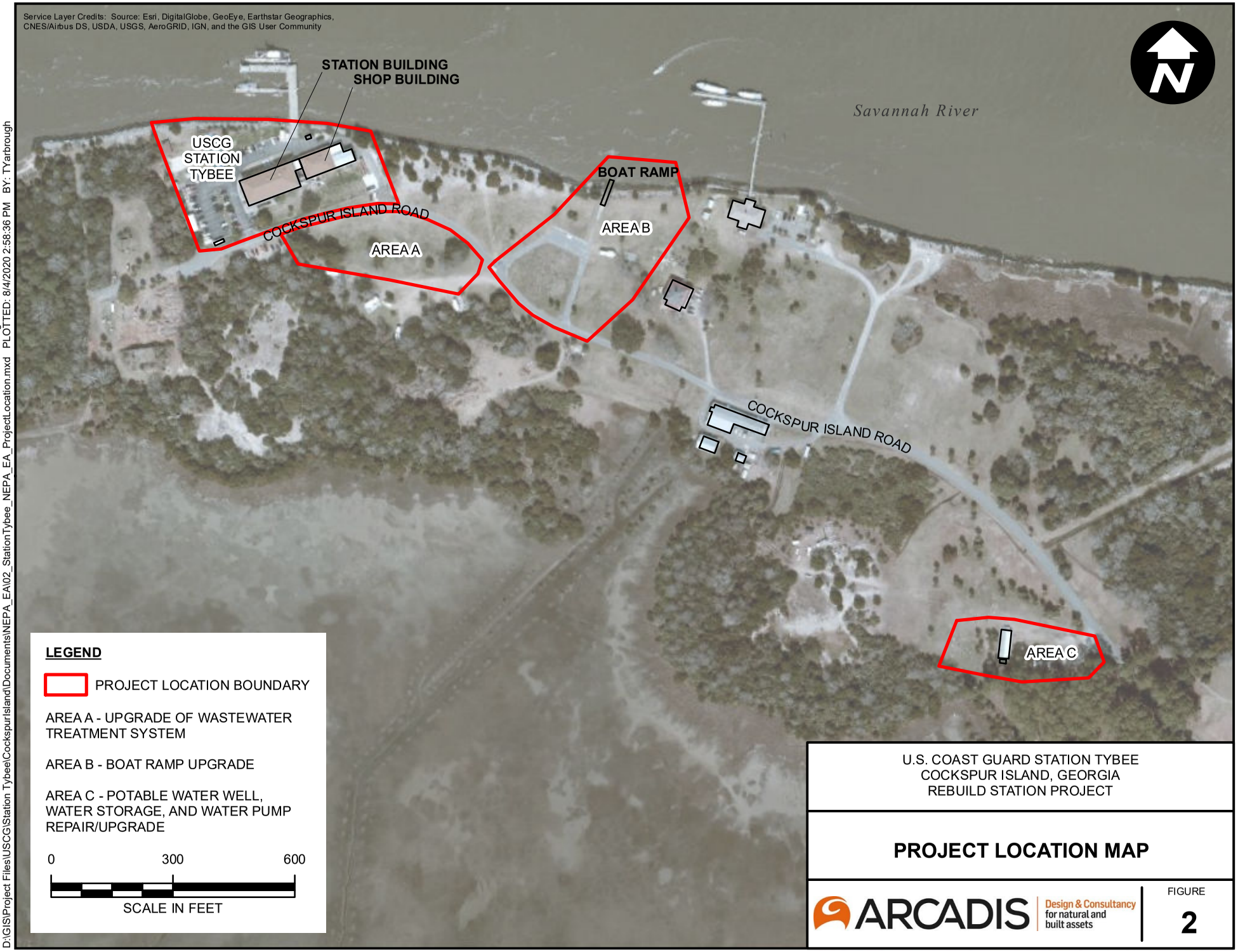

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COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
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11000

AUG 25 2020

Leif Palmer, Regional Counsel
U.S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Greetings Mr. Palmer,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Sincerely,

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Captain, U. S. Coast Guard

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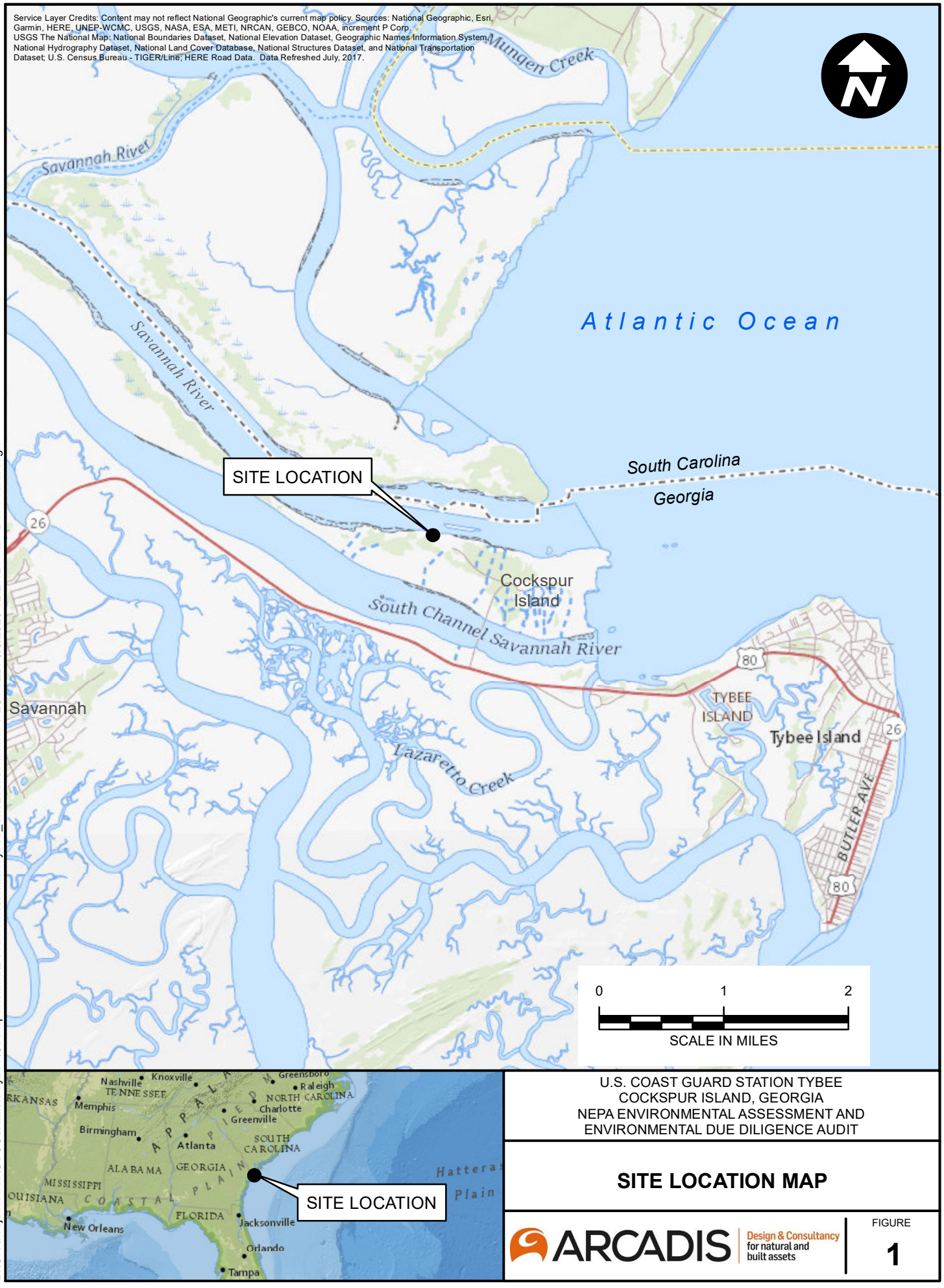

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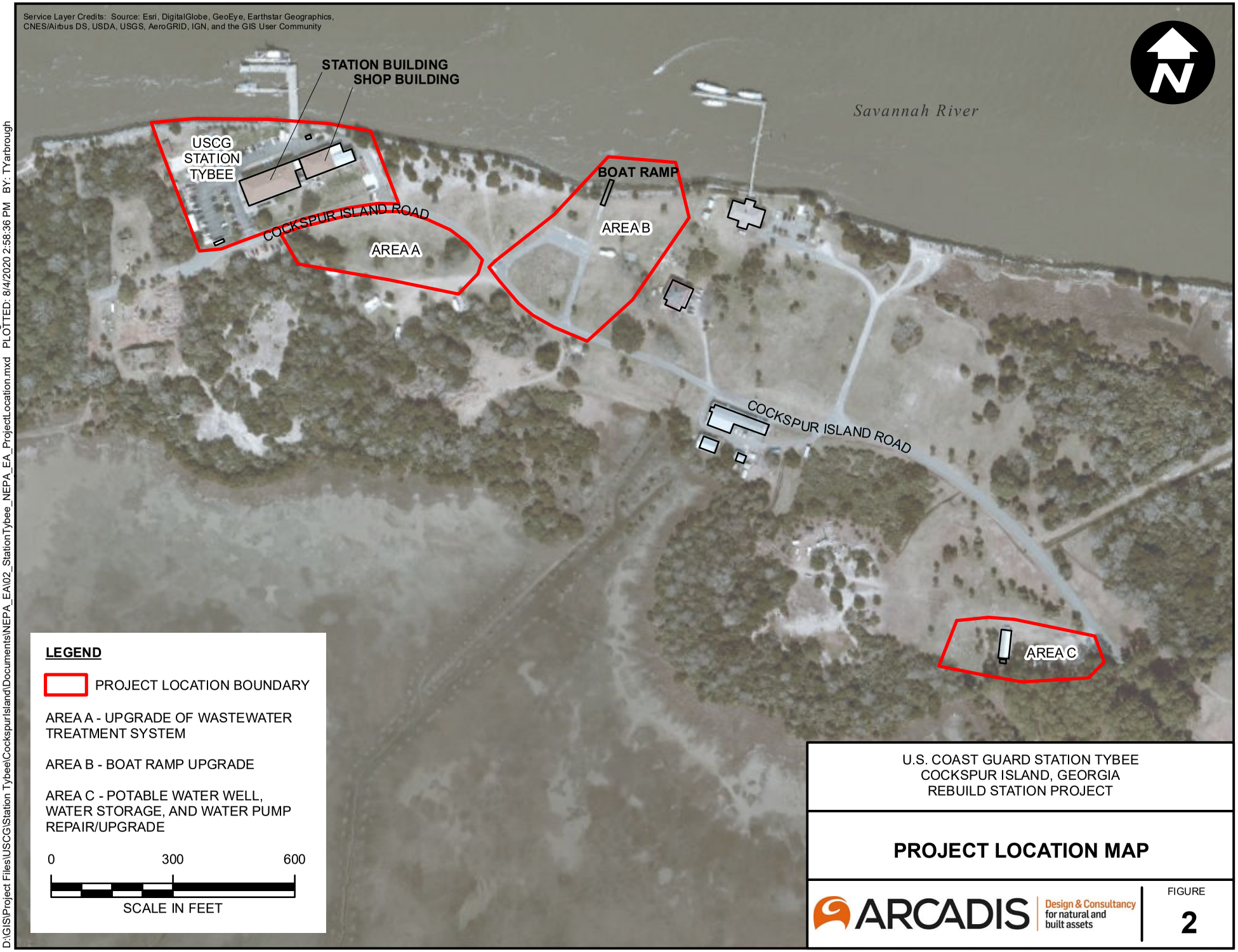

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FIGURE
2

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11000

AUG 25 2020

Doug Haymans, Director
Coastal Resources Division
Georgia Department of Natural Resources
One Conservation Way
Brunswick, GA 31520

Greetings Mr. Haymans,

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Captain, U. S. Coast Guard

Enclosure: Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

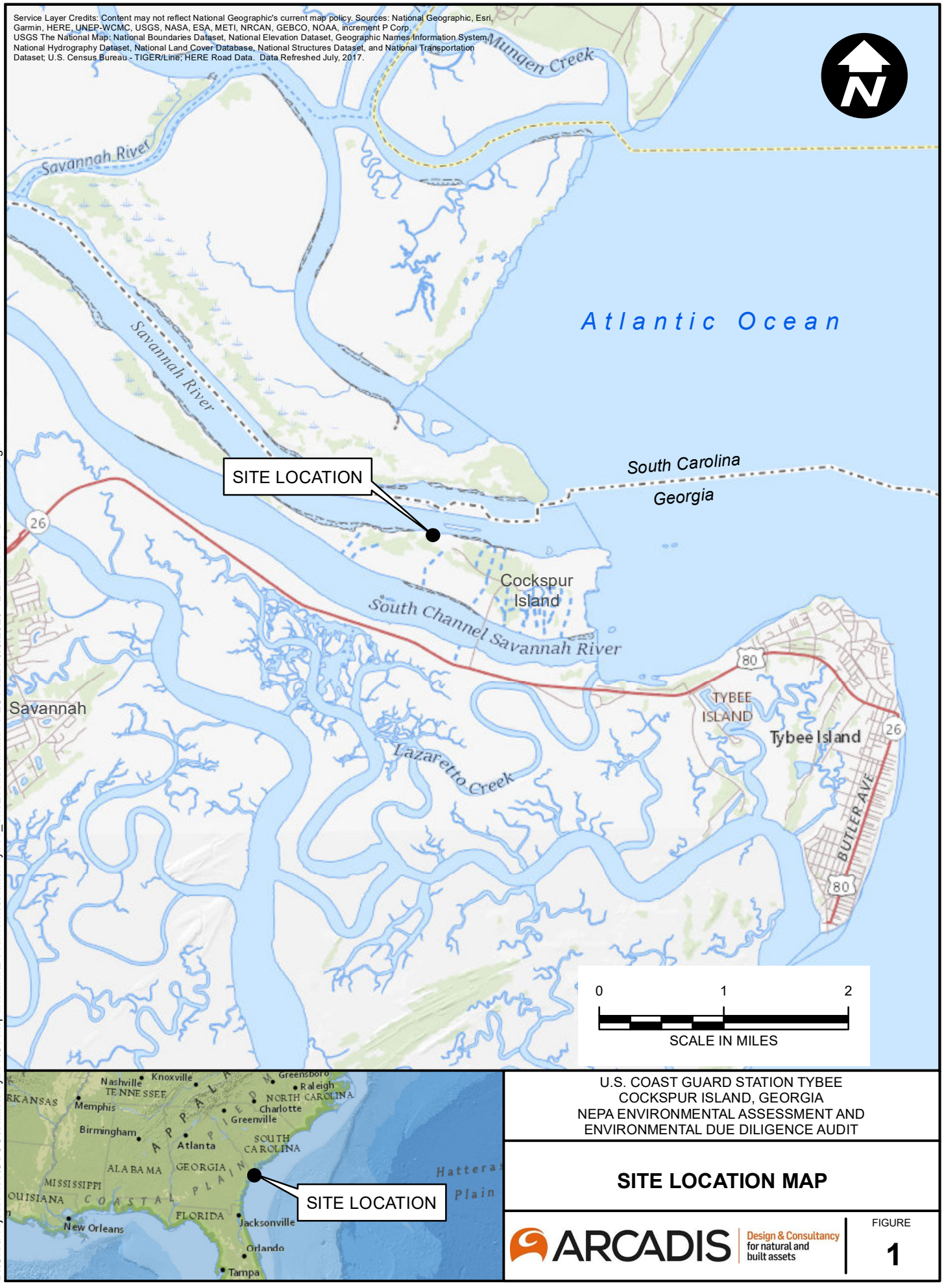
The scope of work for the proposed project includes work within the Station's existing compound area and within three additional areas outside of the compound as follows:

1. **Existing Compound Area** - Replace the existing Station and support buildings with a new multi-mission building, repair the stone rip-rap along the Station shoreline, complete major site work, to include reconfiguring parking areas and internal Station roads, and make major upgrades to utilities.
2. **Area A** - Located to the immediate southeast of the Existing Station; upgrade/replace the existing wastewater treatment system.
3. **Area B** - Located east of the Station compound, repair and upgrade an existing NPS boat ramp to accommodate USCG boats.
4. **Area C** - Located south of the Station compound; repair and upgrade the existing potable groundwater system. This will include constructing a new pump house.

The general project site and specific work areas are shown on the attached **Figure 1** and **Figure 2**.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the following three alternative actions:

1. ***No Action Alternative*** - This alternative would retain existing facilities (buildings and piers) at USCG Station Tybee for indefinite continued use. Continued necessary repairs would be provided, but no additional space would be constructed, and no major reconfiguration of existing space would be performed.
2. ***Rehabilitation Option 1*** - The USCG would complete all rehabilitation within the existing USCG compound, including construction of a new multi-mission building, repairs to the wastewater system, repairs to the drinking water system, and realignment of parking and roads within the compound. A new boat ramp would be constructed adjacent to the existing USCG Station Tybee pier.
3. ***Rehabilitation Option 2 (Proposed Project)*** - Same as Option 1, except the USCG would slightly enlarge the existing NPS boat ramp east of USCG Station Tybee for use by the USCG and make improvements to the nearby NPS potable water system. Additionally, the USCG would upgrade the current wastewater treatment system operated by the NPS to serve USCG STA Tybee. With this option, a more efficient facility layout is possible, while minimizing environmental impacts.



U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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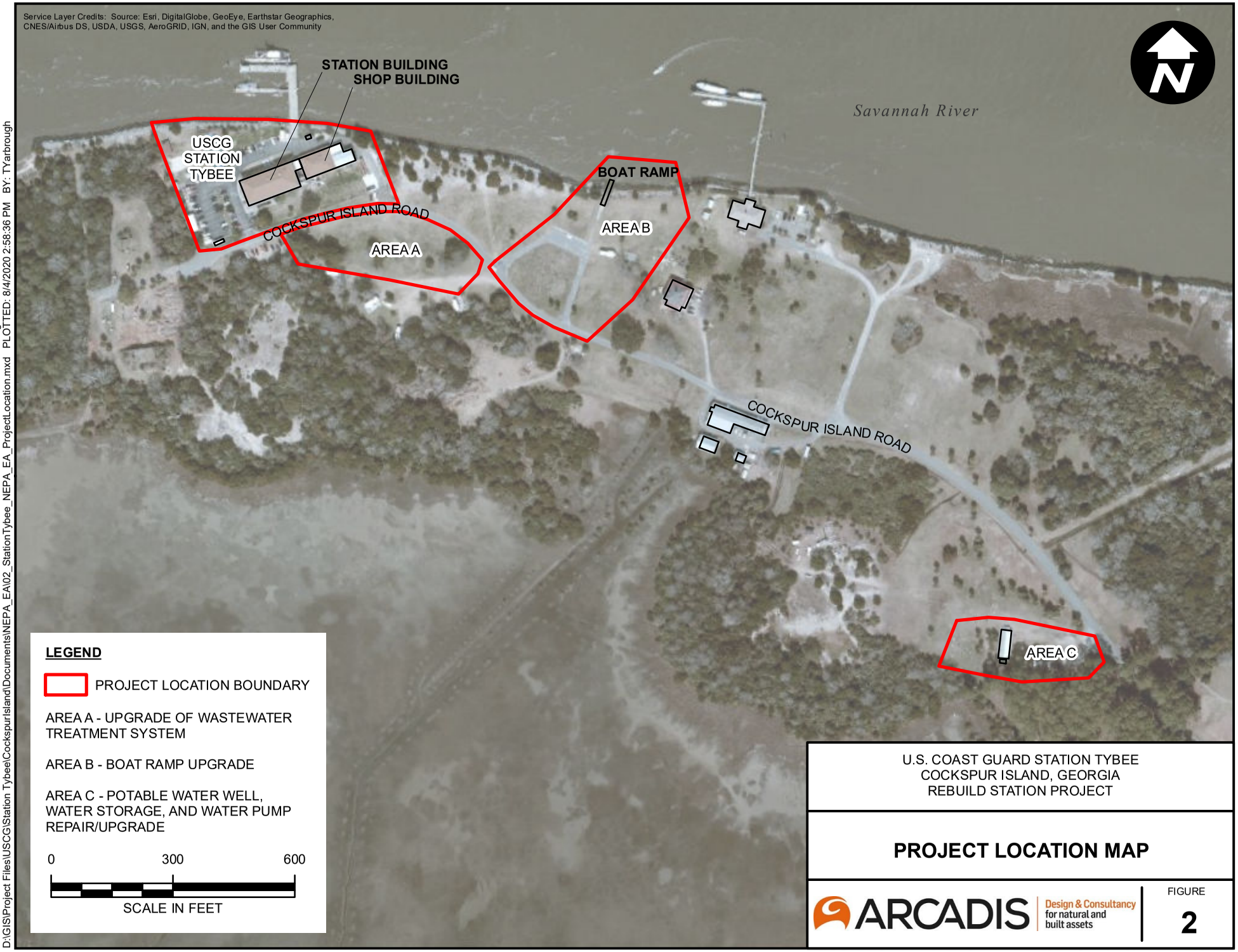

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

AUG 25 2020

Lee Smith, County Manager
Chatham County
P. O. Box 8161
Savannah, Georgia 31412

Greetings Mr. Smith,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

The scope of work for the proposed project includes: replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station shoreline, and major site work; upgrading/replacing the NPS wastewater treatment system; repairing /upgrading the NPS boat ramp; and. repairing/upgrading the NPS existing potable water system.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the No Action Alternatives and two rehabilitation options, which are described in the enclosure.

Please provide any questions or comments you may have on our project no later than September 10, 2020. Mr. Richard Hylton is my representative for this project and is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance with this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Description

USCG STATION TYBEE STATION REBUILD PROJECT

Project Scope Description

The scope of work for the proposed project includes work within the Station's existing compound area and within three additional areas outside of the compound as follows:

1. **Existing Compound Area** - Replace the existing Station and support buildings with a new multi-mission building, repair the stone rip-rap along the Station shoreline, complete major site work, to include reconfiguring parking areas and internal Station roads, and make major upgrades to utilities.
2. **Area A** - Located to the immediate southeast of the Existing Station; upgrade/replace the existing wastewater treatment system.
3. **Area B** - Located east of the Station compound, repair and upgrade an existing NPS boat ramp to accommodate USCG boats.
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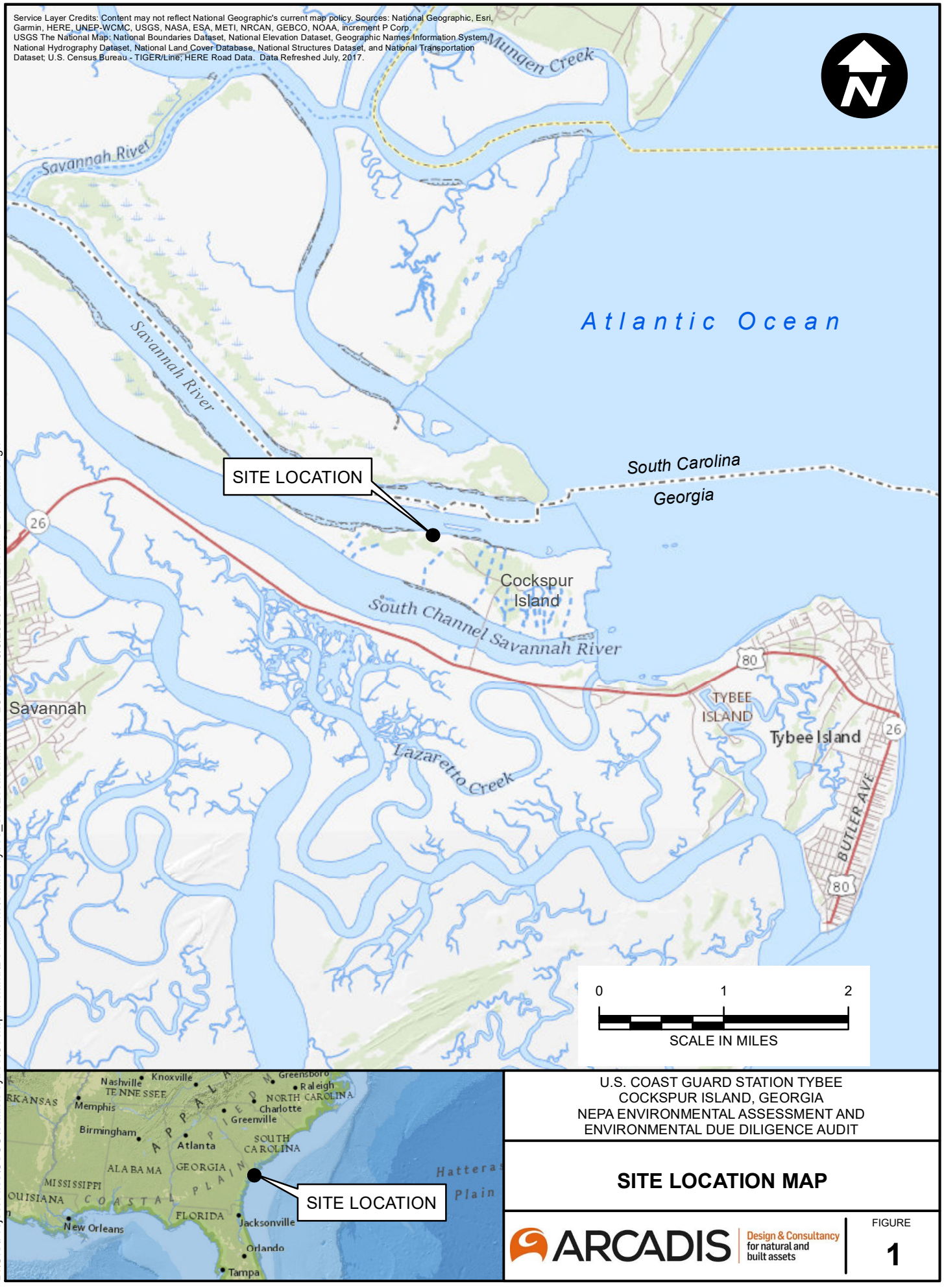
3. ***Rehabilitation Option 2 (Proposed Project)*** - Same as Option 1, except the USCG would slightly enlarge the existing NPS boat ramp east of USCG Station Tybee for use by the USCG and make improvements to the nearby NPS potable water system. Additionally, the USCG would upgrade the current wastewater treatment system operated by the NPS to serve USCG STA Tybee. With this option, a more efficient facility layout is possible, while minimizing environmental impacts.



U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

CITY: NOVI, MI DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: 30049571 COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
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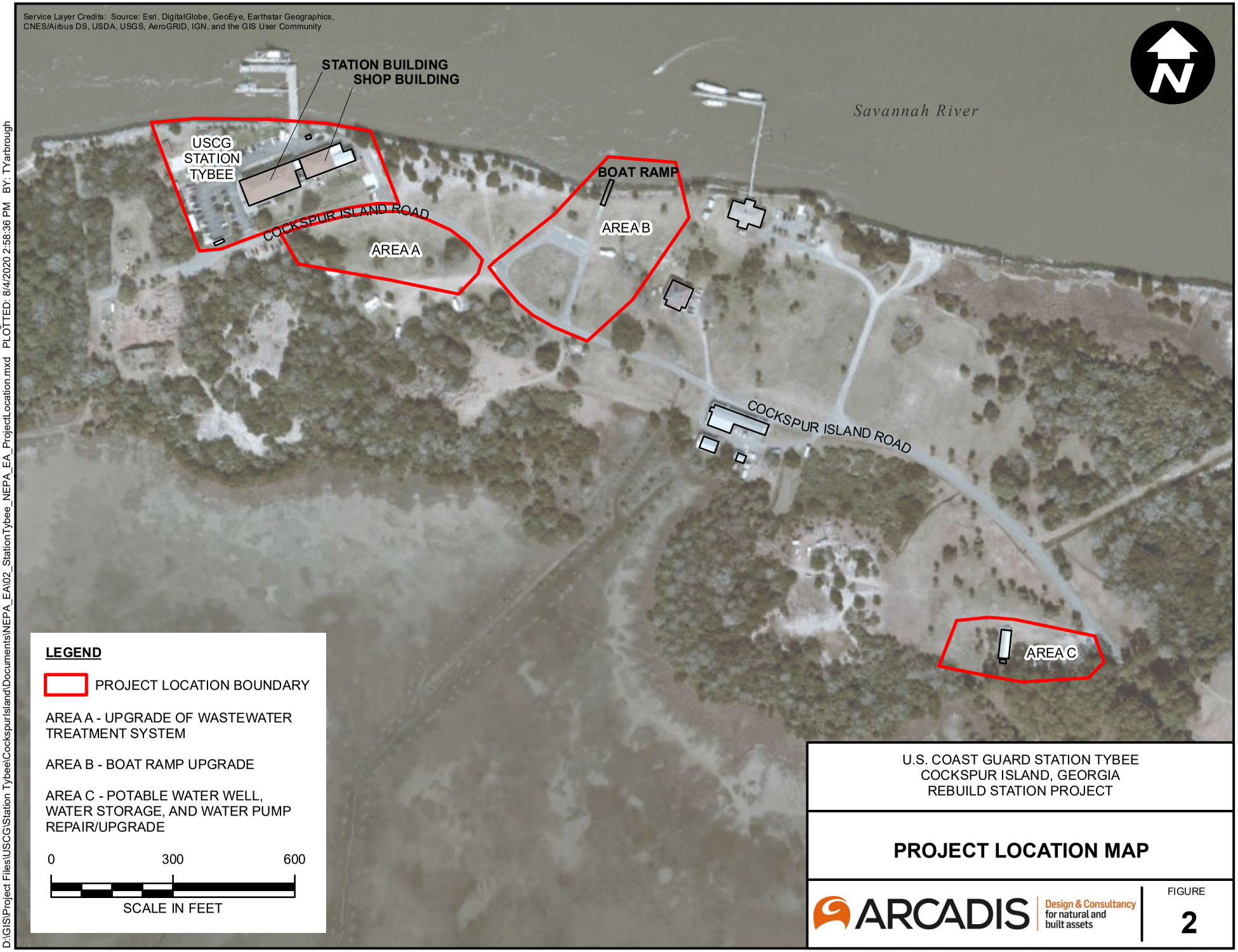

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

AUG 25 2020

Bryan Tucker, State Archaeologist and Operations Manager
Historic Preservation Division
Georgia Department of Natural Resources
Jewett Center for Historic Preservation
2610 GA Hwy 155, SW
Stockbridge, GA 30281

Greetings Mr. Tucker,

U.S. Coast Guard (USCG) Station (STA) Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

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Please provide any questions or comments you may have on our project no later than September 10, 2020. Mr. Richard Hylton is my representative for this project and is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance with this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Description

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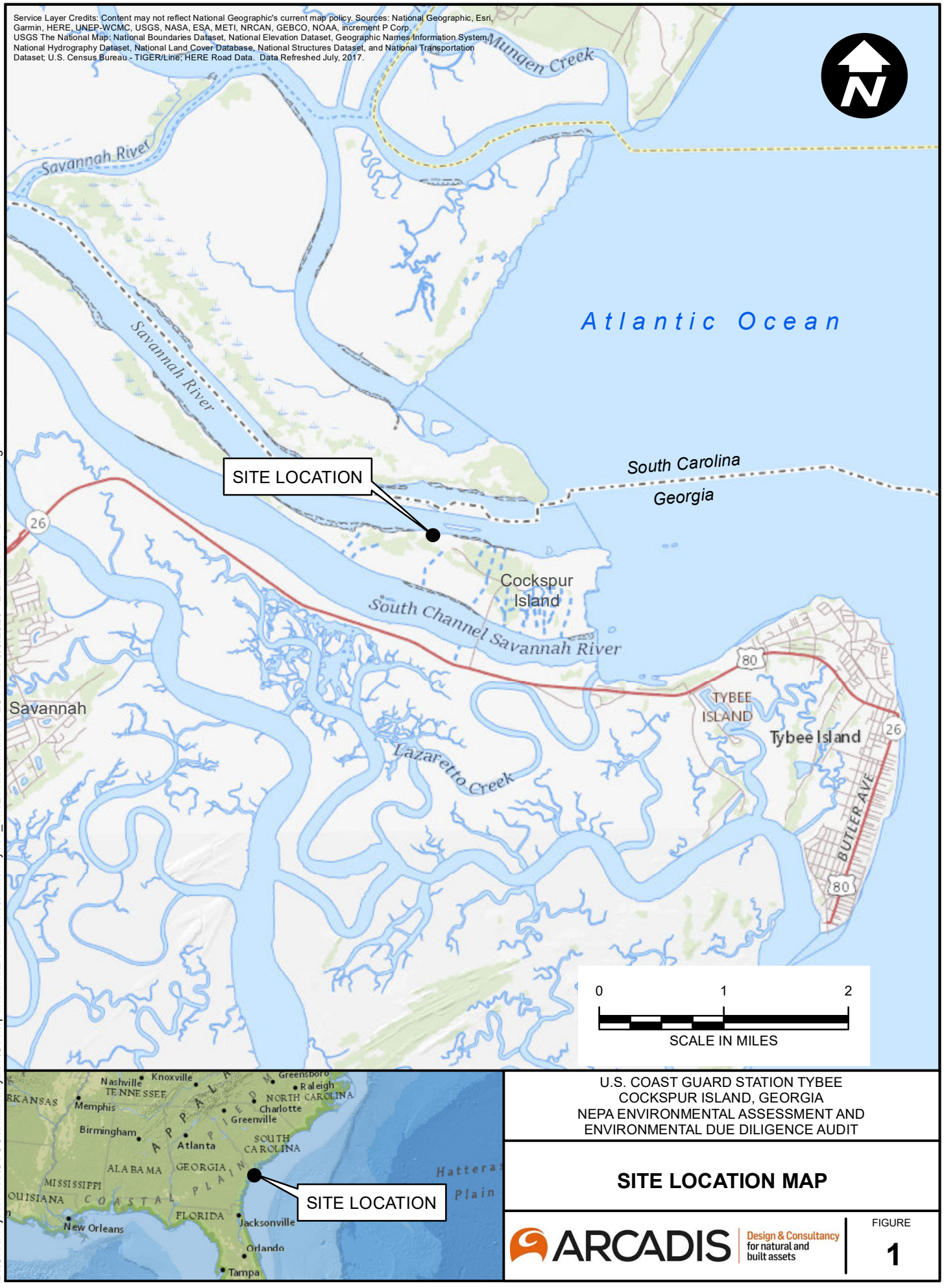

U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NEPA ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL DUE DILIGENCE AUDIT

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

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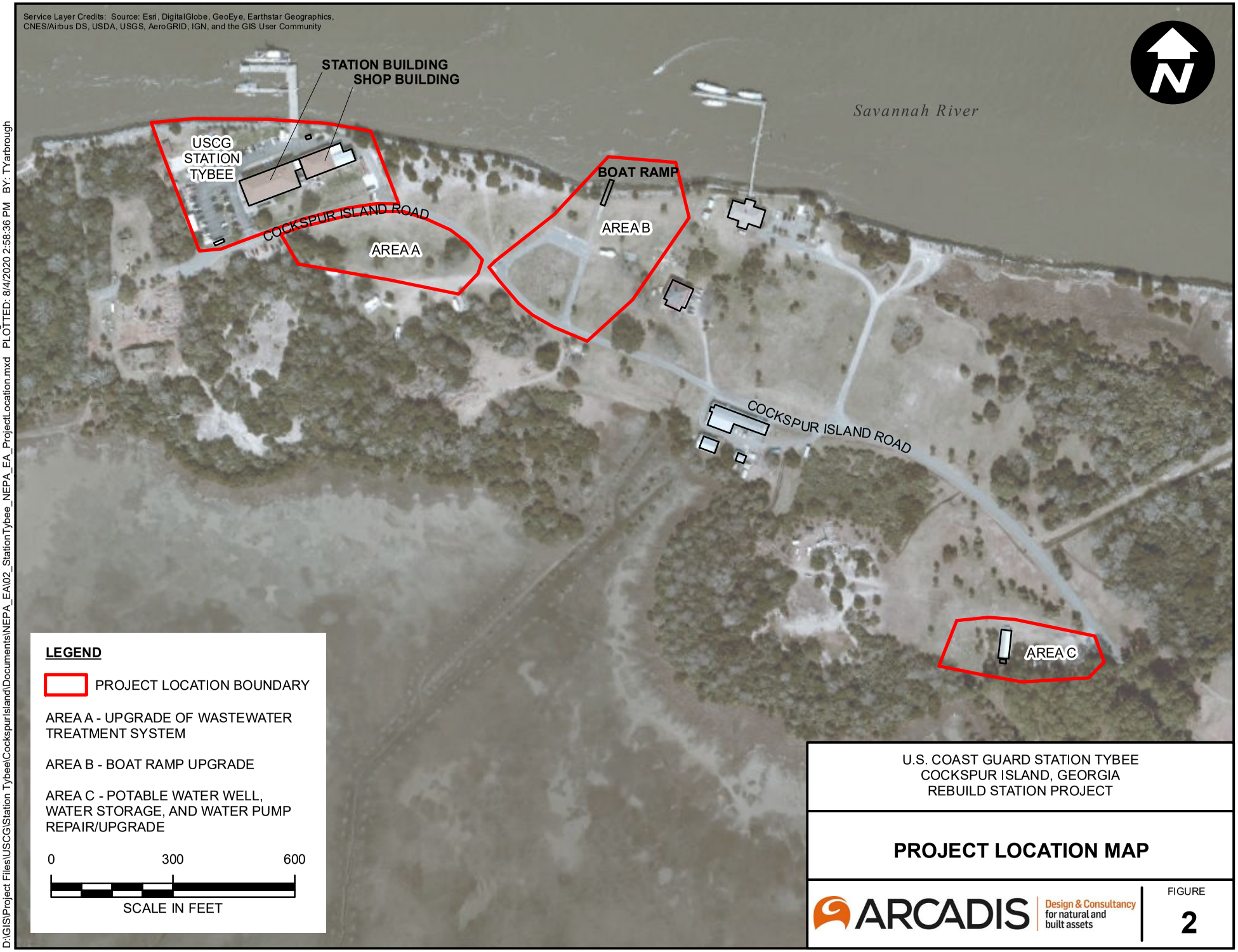

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U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
REBUILD STATION PROJECT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

SEP 17 2020

Stan Austin, Regional Director
National Park Service
100 Alabama Street, SW
1924 Building
Atlanta, GA 30303

Greetings Mr. Austin,

U.S. Coast Guard (USCG) Station Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument and the Fort Pulaski National Monument National Register Historic District. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize the Station with modern facilities that meet today's standards to better serve the USCG's various missions, and harden the Station's infrastructure for future resiliency.

The scope of work for the proposed project includes replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station's shoreline, upgrading/replacing the wastewater treatment system, repairing /upgrading a nearby NPS boat ramp, and upgrading the NPS's existing potable water system to provide more reliable potable water service to both the USCG and the NPS.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the USCG will complete an environmental analysis of the project that will be documented in an Environmental Assessment (EA). The EA will evaluate the possible environmental consequences of the No Action Alternatives and two rehabilitation options, which are described in the enclosure.

Your agency has been identified as an agency that has an interest in the proposed project based on your jurisdiction by law and/or special expertise. As the lead Federal agency under NEPA, we invite you to be a cooperating agency with the Corps in the development of the EA. Your designation as a cooperating agency does not imply you support the USCG's proposed project nor does it diminish or otherwise modify your agency's independent statutory obligations and responsibilities under applicable federal laws, regulations and Executive Orders.

In accordance with the Council on Environmental Quality (CEQ) final implementing regulations for NEPA (40 C.F.R. § 1501.6 and § 1508.5), the USCG requests your assistance and participation in the NEPA process in the following ways:

a) Input during scoping;
b) Comment and feedback on the overall scope of the document, significant issues to be evaluated in the EA, environmental impacts, study and assessment methodologies, range of alternatives and proposed compensatory mitigation, if applicable;
c) Guidance on relevant technical studies required as part of the EA;
d) Identification of issues related to your agency's jurisdiction by law and special expertise;
e) Review of the administrative and public drafts of the Draft EA and Final EA; and
f) Adoption the USCG Final EA, when needed to fulfill your independent NEPA obligations related to your Federal action and to reduce duplication with other Federal, State, Tribal and local procedures

We look forward to working with your agency on the preparation of this critical EA, and respectfully request your written acceptance of this invitation on or before October 15, 2020. If you have any questions or concerns please contact my representative, Mr. Richard Hylton, for this project. He is available either via e-mail at rick.d.hylton@uscg.mil or by mail at U.S. Coast Guard, Facilities Design and Construction Center, 5505 Robin Hood Rd, Suite K, Norfolk, VA 23513. Thank you for your assistance with this critical USCG project.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Project Scope Location and Description

CITY: Novi DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
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STATION REBUILD PROJECT
COCKSPUR ISLAND, GEORGIA
ENVIRONMENTAL DUE DILIGENCE AUDIT REPORT

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

United States Department of the Interior

NATIONAL PARK SERVICE
Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

IN REPLY REFER TO:

1.A.2. (SERO-PC)

October 1, 2020

Captain J.F. Barresi
U.S. Coast Guard
5505 Robin Hood Road, Suite K
Norfolk, Virginia 23513-2431

Dear Captain Barresi:

The National Park Service (NPS) formally accepts your September 17, 2020, invitation to become a Cooperating Agency in the development of the National Environmental Policy Act of 1969 (NEPA) document for the proposed project to replace the station and support buildings at the U.S. Coast Guard (USCG) Station Tybee, Cockspur Island, Georgia. As a Cooperating Agency, the NPS proposes to assist the USCG in developing the NEPA document in order to ensure that pertinent NPS mission statements, legislative authorities, and policies are duly considered when developing any alternatives, related management actions, or options that could potentially affect the Fort Pulaski National Monument.

Regulations implementing the procedural provisions of the NEPA, call for agency cooperation in the NEPA process with the ultimate goal of "…decisions that are based on understanding of environmental consequences, and … actions that protect, restore, and enhance the environment." 40 C.F.R. §1500.1. The regulations specifically define a Cooperating Agency as "…any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. §1508.5.

The NPS' Cooperating Agency status and level of involvement would not preclude our independent review and comment responsibilities under Section 102(2)(C) of NEPA. Similarly, our being a Cooperating Agency would not imply that the NPS would necessarily concur with all aspects of the USCG's findings.

We appreciate your coordination with us and look forward to working with USCG on this important project. Should you have any questions, please contact Ms. Melissa Memory, Superintendent, Fort Pulaski National Monument, by calling (912) 786-8182, ext. 1107.

Sincerely,

Stan Austin
Regional Director

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
OCT 2 2 2020

Leopoldo Miranda, Director
USFWS Southeast Regional Office
1875 Century Blvd.
Atlanta, GA 30345

Greetings Mr. Miranda,

U.S. Coast Guard (USCG) Station Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize and rebuild the Station with modern facilities that meet today's standards to better serve the USCG's various missions and harden the Station's infrastructure for future resiliency.

The scope of work for the Proposed Action includes: replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station shoreline, upgrading/replacing the NPS wastewater treatment system; upgrading an existing NPS boat ramp, and upgrading the NPS existing potable water system.

In accordance with the National Environmental Policy Act, the USCG is completing an Environmental Assessment for this proposed action. Part of this process includes an evaluation of the project's impact on endangered species and critical impact. The enclosed document provides this evaluation, which concludes that the Proposed Action will not impact endangered species or destroy or adversely modify their critical habitat. We respectfully request your concurrence with this evaluation. If further information is required, please contact Mr. Richard Hylton, at (757) 852-3404 or by e-mail at rick.d.hylton@uscg.mil.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: (1) USCG Station Tybee Rebuild Project - Evaluation of Effects on Federally Listed Species and Critical Habitats

USCG STATION TYBEE REBUILD PROJECT
EVALUATION OF EFFECTS ON FEDERALLY LISTED SPECIES AND CRITICAL HABITATS

Proposed Action

The purpose of the Proposed Action (the project) is to recapitalize and rebuild the Station to better accomplish its various missions with modern facilities that comply with today's standards and harden its infrastructure for future resiliency. The Proposed Action is needed to create facilities and infrastructure that meet the needs and requirements of the USCG personnel that operate from this Station. The current Station has suffered damage and general deterioration over the past several years and does not meet the modern standards for USCG facilities to include hurricane resiliency requirements.

The Proposed Action would demolish and replace Station Tybee Building 101 (15,857 gross square feet [GSF]), Buildings 102, 109, and other buildings (total 23,096 GSF). Construction of a total of 26,000 GSF (replacing Station Building 101, Shop Building 109, and Aids to Navigation Team Building) would satisfy the current needs for Station Tybee, Aids to Navigation Team Tybee, and Coast Guard Cutter POMPANO functions at Station Tybee. Building 101 would be re-constructed slightly to the west of the current building and the main entrance gate would be shifted to the west to free up space for circulation and parking for trailered boats and shop operations. This would also include some associated pavement expansion and utilities extension. The existing eroded rip-rap shoreline at Station Tybee would be repaired by placing additional stone in the areas to either side of the existing Station pier. During the construction period, temporary space would be provided in leased trailers on site.

In addition, the Proposed Action would include improvements completed beyond the Station Tybee compound. These improvements would include upgrading the existing NPS wastewater treatment system within Area A, upgrading the existing NPS potable water system within Area C, and expanding the NPS Boat Ramp within Area B. Each of these is briefly discussed in the following paragraphs. Station Tybee compound and Areas A, B, and C are shown on **Figure 2**.

Area A – Upgrade the Existing NPS Wastewater Treatment System: Upgrades to the existing NPS wastewater treatment system would be accomplished through modification to the mound system within Area A. This modification would involve supplementing or replacing entirely the existing mound within Area A with a Wisconsin Mound soil absorption system..

Area B – Upgrade NPS Boat Ramp: The existing concrete ramp, which is approximately eight feet wide, would be removed and replaced with a new 15-foot wide concrete ramp. The

end of the new ramp would extend approximately 50 feet beyond the northern edge of the existing ramp. Two floating launching docks, each four feet wide, would be installed on either side of the concrete ramp. The launching docks would extend approximately 115 feet beyond the shore.

Area C - Upgrade the Existing NPS Potable Water Supply System: A new elevated pump house and emergency generator are proposed to be constructed, and casing for the existing water supply well would be extended to avoid high salinity flood waters from entering the well and groundwater. The preferred location of the new pump house is near the southwest corner of the Picnic Pavilion. To construct the new pump house and also provide temporary parking and a construction laydown area, it is anticipated that the contractor will place geotextile fabric and a minimum of 6 inches of densely graded aggregate from the access off Tybee Coast Guard Station Drive to the location of the new pump house. The aggregate may remain in place following construction to be used as a parking area.

Endangered Species Act Federally Listed Species

The USFWS, Georgia Ecological Services Field Office was contacted through the Information, Planning, and Conservation System (IPaC) regarding the potential presence of species under the jurisdiction of the USFWS within the area of the Proposed Action (Consultation Code: 04EG1000-2020-SLI-2882). The USFWS Official Species List is included. USFWS indicates that 14 threatened, endangered or candidate species may occur within the project area: West Indian manatee (*Trichechus manatus*), piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), red-cockaded woodpecker (*Picoides borealis*), wood stork (*Mycteria americana*), Eastern indigo snake (*Drymarchon corais couperi*), gopher tortoise (*Gopherus polyphemus*), green sea turtle (*Chelonia mydas*), hawksbill sea turtle (*Eretmochelys imbricata*), Kemp's ridley sea turtle (*Lepidochelys kempii*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*), frosted flatwoods salamander (*Ambystoma cingulatum*), and pondberry (*Lingera melissifolia*). Table 1 presents a list of these federally listed species and their preferred habitat. Additional descriptions of each species and their habitats are summarized below based on the Georgia Department of Natural Resources (GADNR) Georgia Natural, Archaeological, and Historic Resources Geographic Information System (GNAHRGIS), the Integrated Resource Management Applications (IRMA) Portal NPSpecies, and USFWS species profiles, unless otherwise referenced.

Common Name	Scientific Name	Federal Listing	Habitat	Previously Known to Occur	Regulatory Agency Authority
West Indian manatee	*Trichechus manatus*	T	Savannah River Project Location Outside of Critical Habitat	At site in Savannah River[1]	USFWS
Piping plover	*Charadrius melodus*	T, CH	Shoreline of Station and Area B	Fort Pulaski[2]	USFWS
Red knot	*Calidris canutus rufa*	T	No designated critical habitat	Fort Pulaski[2]	USFWS
Red-cockaded Woodpecker	*Picoides borealis*	E	No designated critical habitat		USFWS
Wood Stork	*Mycteria americana*	T	Shoreline of Station and Area B	Fort Pulaski[2]	USFWS
Eastern Indigo Snake	*Drymarchon corais couperi*	T	No designated critical habitat		USFWS
Gopher Tortoise	*Gopherus polyphemus*	C	No designated critical habitat		USFWS (nesting) NOAA NMFS (open water)
Green sea turtle	*Chelonia mydas*	T	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Hawksbill sea turtle	*Eretmochelys imbricata*	E	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Leatherback sea turtle	*Dermochelys coriacea*	E	Savannah River Project Area Outside of Critical Habitat		USFWS (nesting) NOAA NMFS (open water)
Loggerhead sea turtle	*Caretta*	T, CH	Savannah River Project Area Overlaps Critical Habitat	2.6 miles E[1]	USFWS (nesting) NOAA NMFS (open water)
Kemp's ridley turtle	*Lepidochelys kempii*	E	Savannah River		USFWS (nesting) NOAA NMFS (open water)
Frosted Flatwoods Salamander	*Ambystoma cingulatum*	T	Project Area Outside of Critical Habitat		USFWS
Pondberry	*Lindera melissifolia*	E	No designated critical habitat		USFWS

[1]GNAHRGIS Letter from GADNR (July 28, 2020); [2]IRMA Portal NPSpecies accessed July 2020

STATUS DESIGNATIONS

CH = Critical Habitat E = Endangered
C = Candidate T = Threatened

NO EFFECT FINDING

The USCG has determined that implementation of the Proposed Action would have ***no effect*** on piping plover, red knot, wood stork, red cockaded woodpecker, green sea turtle, hawksbill sea turtle, leatherback sea turtle, loggerhead sea turtle, Kemp's ridley sea turtle, Eastern indigo snake, gopher tortoise, frosted flatwoods salamander, and pondberry.

- **Piping Plover, Red Knot and Wood Stork:** Piping plovers and red knots are found on sandy beaches and tidal flats, typically nesting in open sandy areas near water (National Audubon Society, 2020a; National Audubon Society, 2020b). Wood storks typically nest in Cypress swamps, marshes, ponds, lagoons and forage mainly in fresh water, including shallow marshes, flooded farm fields, ponds, ditches (National Audubon Society. 2020c). The Station and NPS boat ramp are situated in a previously disturbed marine shipping and porting area that is heavily used for docking activities by the USCG and Harbor Pilots. Regular human activity and vessel traffic are not conducive toward suitable habitat for these shore and marsh birds. During the terrestrial field survey completed on July 17, 2020, shoreline habitat area near the Station and within Area B was determined to be suitable foraging habitat for piping plover and red knot. As a result, Piping plover and red knot may be present on a transient basis at or near the project location boundaries; however, wood stork would not be expected to be present.

- **Red-cockaded Woodpecker:** The red-cockaded woodpecker prefers open mature pine woodlands and is rare throughout its range (Kaufman, 2020.). No suitable habitat is present within the Proposed Action area, which is mostly comprised of previously disturbed (impervious) areas and patches of undeveloped grasslands.

- **Sea Turtles:** The Proposed Action is not anticipated to affect the green sea turtle, hawksbill sea turtle, and leatherback sea turtle, as the project area is outside of the identified critical habitat for these species (USFWS, 2020). Although the project area overlaps critical habitat for the loggerhead sea turtle, loggerhead sea turtles nest on Tybee Island and nearshore marine waters along the Tybee Island oceanfront beach and there is no suitable nesting habitat within the project area (USFWS, 2020). No suitable nesting habitat for the Kemp's ridley sea turtle exists near the project location boundaries.

- **Eastern Indigo Snake:** The Proposed Action is not anticipated to affect the Eastern indigo snake, whose range extends from Florida to Southeast Georgia. There are no records of the Eastern indigo snake presence in the Savannah area in Chatham County, although suitable habitat occurs (at least historically) in the form of xeric sandhills along the Ogeechee River (USFWS, 2018). No suitable habitat for the Eastern indigo snake exists within or near the project location boundaries.

- **Gopher Tortoise:** The Proposed Action is not anticipated to affect the Gopher Tortoise. Gopher Tortoises are found in the Lower Coastal Plain of the Southeast, and the species prefers well-drained sandy areas (GADNR, n.d.).

- **Frosted Flatwoods Salamander:** The Proposed Action is not anticipated to affect the frosted flatwoods salamander. This species prefers open longleaf pine (*Pinus palustris*) or slash pine (*Pinus elliottii*) flatwoods or savannas with wiregrass (*Aristida stricta*) (Meadows & Wilson, n.d.). No suitable habitat for the frosted flatwoods salamander exists within or near the project location boundaries.

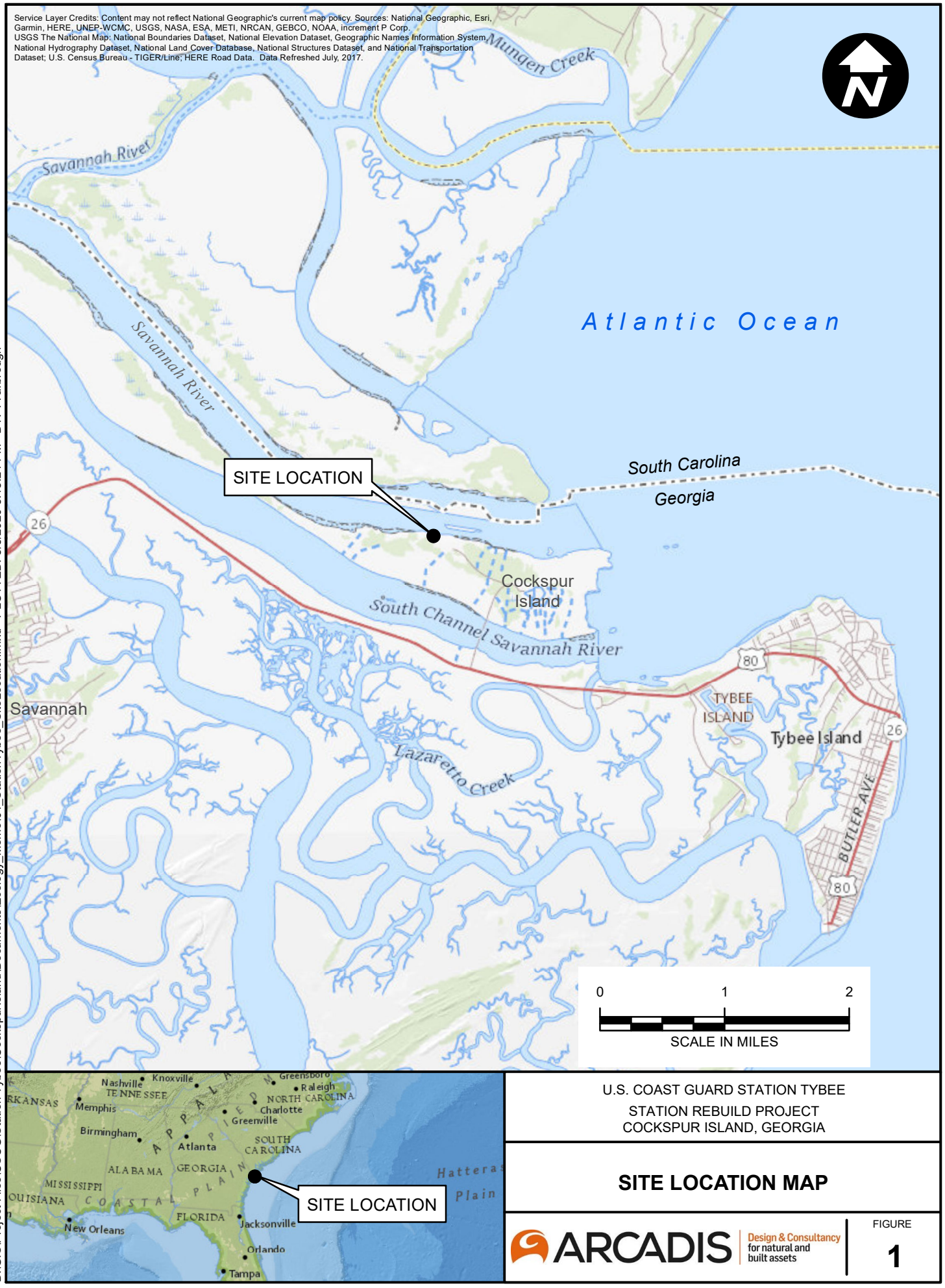
- **Pondberry:** The Proposed Action is not anticipated to affect pondberry, which is mainly associated with wetland habitats such as bottomland and hardwoods in the interior areas, and the margins of sinks, ponds, and other depressions in the more coastal sites (USFWS, 2017). The plants generally grow in shaded areas but may also be found in full sun (USFWS, 2017). There is no suitable habitat for pondberry within or near the project location boundaries.

MAY AFFECT BUT IS NOT LIKELY TO ADVERSELY AFFECT

- **West Indian Manatee:** Manatees have the potential to occur in waters surrounding Station Tybee. The West Indian manatee has been sighted throughout the Savannah River estuary during the warmer months. Manatees are observed in the Savannah River estuary primarily during the months of April through October (Ecology & Environment, 2010). The project location, however, is outside of critical habitat for the West Indian manatee (USFWS, 2020). Correspondence received from the GADNR on July 28, 2020 indicates there are known occurrences of the West Indiana manatee near the project location boundary in the Savannah River. Per the GADNR correspondence, manatees may also occur in the vicinity of the project location boundary during March through November if the water temperature is above 17 degrees Celsius. GADNR has recommended conducting in-water construction work during December through February to eliminate the risk to manatees.

Conclusion

The USCG respectfully requests USFWS review and provide its concurrence with the effect determinations stated in this letter. Please advise if there are any further actions needed to facilitate the implementation of the Proposed Action in a manner that avoids or minimizes adverse effects to federally listed species. Any issues identified by your office will be addressed in the EA. Please provide any comments, concerns, information, studies, or other data you may have regarding the Proposed Action within thirty (30) days of receipt of this letter to enable us to complete this phase of the project within the scheduled timeframe.



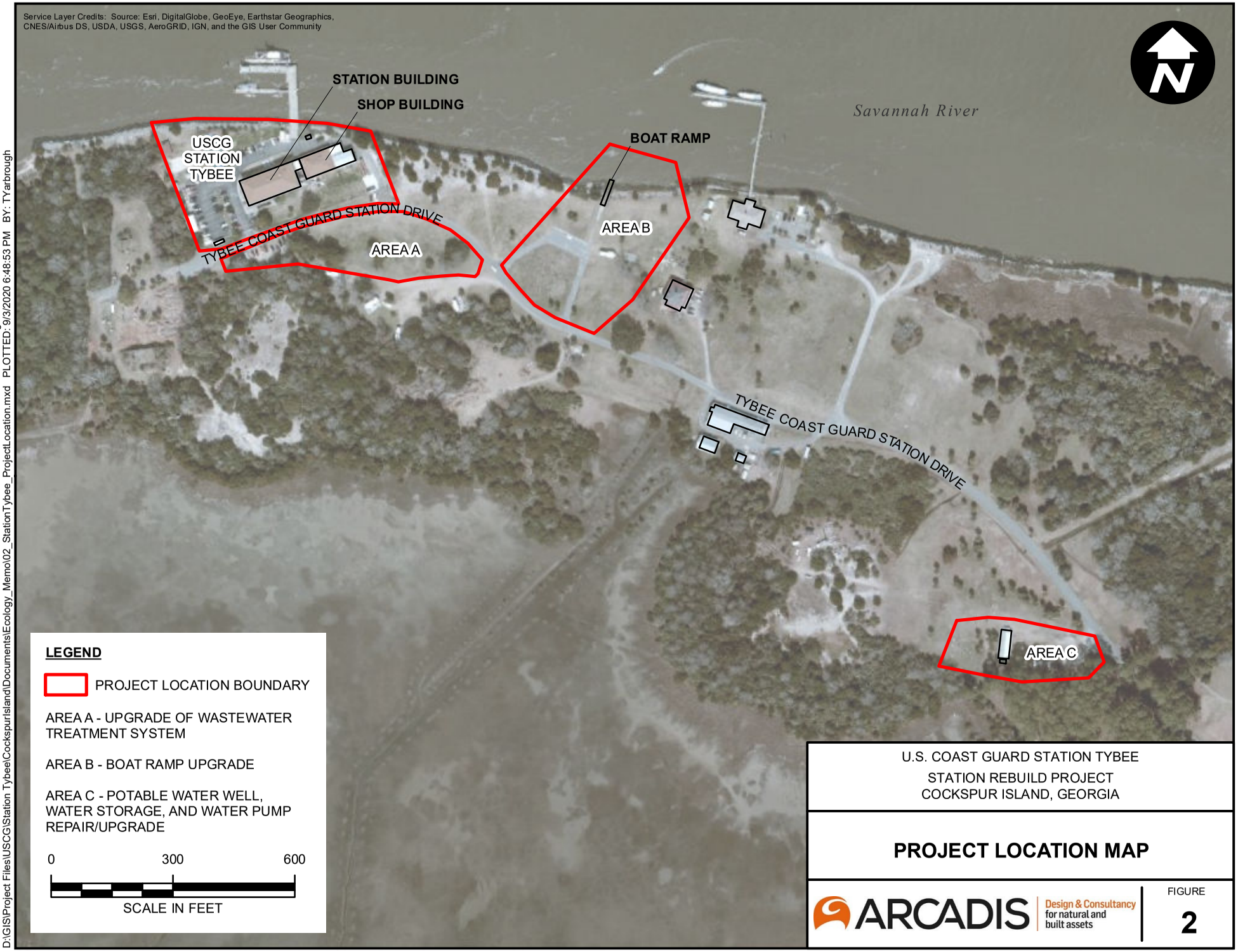
U.S. COAST GUARD STATION TYBEE
STATION REBUILD PROJECT
COCKSPUR ISLAND, GEORGIA

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1

CITY: NOVI, MI DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: 30049571 COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
D:\GIS\Project Files\USCG\Station Tybee\CockspurIsland\Documents\Ecology_Memo\01_StationTybee_SiteLocation.mxd PLOTTED: 8/5/2020 3:18:21 PM BY: TYarbrough



CITY: Novi DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
D:\GIS\Project Files\USCG\Station Tybee\CockspurIsland\Documents\Ecology_Memo\02_StationTybee_ProjectLocation.mxd PLOTTED: 9/3/2020 6:48:53 PM BY: TYarbrough

U.S. COAST GUARD STATION TYBEE

STATION REBUILD PROJECT
COCKSPUR ISLAND, GEORGIA

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

References:

Ecology and Environment, Inc. 2010. *Environmental Assessment for the Recapitalization of USCG Station Tybee Cockspur Island, Chatham County, Georgia,* August 2010.

GADNR. (n.d.). Wildlife Resources Division. *Forest Management Practices to Enhance Habitat for the Gopher Tortoise.* Retrieved September 10, 2020 from https://georgiawildlife.com/sites/default/files/wrd/pdf/management/ForestManagement_GopherTortoise.pdf

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U.S. Fish and Wildlife Service Information for Planning and Consultation (IPAC) Report

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To: July 14, 2020
Consultation Code: 04EG1000-2020-SLI-2882
Event Code: 04EG1000-2020-E-05318
Project Name: US Coast Guard Tybee Island

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make “no effect” determinations. If you determine that your proposed action will have “no effect” on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at www.fws.gov/endangered/esa-library/index.html#consultations.

Action Area. The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

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.

If you determine that your action may affect any federally listed species and would like technical assistance from our office please provide the following information (reference to these items can be found in 50 CFR402.13 and 402.14):

A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:

1. The purpose of the action;

2. The duration and timing of the action;

3. The location of the action;

4. The specific components of the action and how they will be carried out;

5. Description of areas to be affected directly or indirectly by the action;

6. Information on the presence of listed species in the action area;

7. Description of effects of the action on species in the action area;

8. Maps, drawings, blueprints, or similar schematics of the action; and

9. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (examples include: stormwater plans, management plans, erosion and sediment plans).

Please submit all consultation documents via email to gaes_assistance@fws.gov or by using IPaC, uploaded documents, and sharing the project with a specific Georgia Ecological Services staff member. If the project is on-going, documents can also be sent to the Georgia ES staff member currently working with you on your project. For Georgia Department of Transportation-related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, www.fws.gov/wetlands/Data/Mapper.html integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

Information related to wind energy development and migratory birds can be found at this location: https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php.

BALD AND GOLDEN EAGLES

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to "disturb" eagles. Under the BGEPA, the Service may issue limited permits to incidentally "take" eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at https://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php and https://www.fws.gov/birds/management/managed-species/eagle-management.php. Additionally the following site will help you determine if your activity is likely to take or disturb bald eagles in the southeast (https://www.fws.gov/southeast/our-services/eagle-technical-assistance).

NATIVE BAT COMMENTS

If your species list includes Indiana bat or northern long-eared bat and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing during the winter. Federally listed bats could be actively present in forested landscapes from April 1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time. Additional information on bat avoidance and minimization can be found at the following link: https://www.fws.gov/athens/transportation/pdfs/Bat_AMMs.pdf.

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (https://georgiawildlife.com/WildlifeActionPlan), at Georgia Department of Natural Resources, Wildlife Resources Division Rare Species and Natural Community Portal (https://georgiawildlife.com/conservation/species-of-concern), Georgia's Natural, Archaeological, and Historic Resources GIS portal (https://www.gnahrgis.org/gnahrgis/index.do), and Georgia Ecological Services Watershed Guidance portal (https://www.fws.gov/athens/transportation/coordination.html).

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further

consultation on your proposed activity, please email gaes_assistance@fws.gov and reference your Service Consultation Tracking Number (Consultation Code).

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

Attachment(s):

- Official Species List
- Migratory Birds

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:

Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601
(706) 613-9493

Project Summary

Consultation Code: 04EG1000-2020-SLI-2882

Event Code: 04EG1000-2020-E-05318

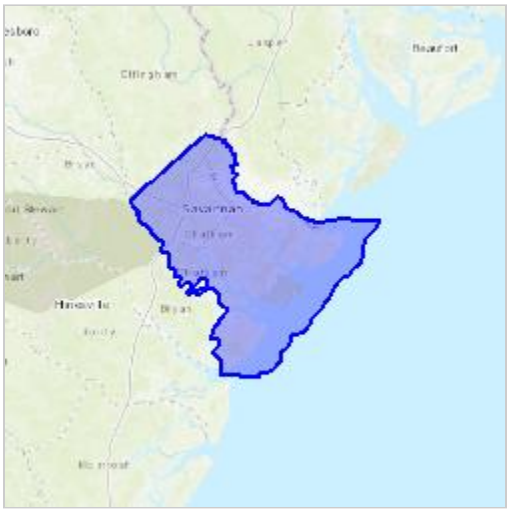
Project Name: US Coast Guard Tybee Island

Project Type: ** OTHER **

Project Description: Construction activities done on the US Coast Guard Tybee Island

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/31.971310699260957N81.03802684052648W



Counties: Chatham, GA

Endangered Species Act Species

There is a total of 14 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.

Mammals

NAME	STATUS
West Indian Manatee *Trichechus manatus* There is **final** critical habitat for this species. Your location is outside the critical habitat. ***This species is also protected by the Marine Mammal Protection Act, and may have additional consultation requirements.*** Species profile: https://ecos.fws.gov/ecp/species/4469	Threatened

Birds

NAME	STATUS
Piping Plover *Charadrius melodus* Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is **final** critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Red Knot *Calidris canutus rufa* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Red-cockaded Woodpecker *Picoides borealis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7614	Endangered
Wood Stork *Mycteria americana* Population: AL, FL, GA, MS, NC, SC No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8477	Threatened

Reptiles

NAME	STATUS
Eastern Indigo Snake *Drymarchon corais couperi* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/646	Threatened
Gopher Tortoise *Gopherus polyphemus* Population: eastern No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6994	Candidate
Green Sea Turtle *Chelonia mydas* Population: North Atlantic DPS There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6199	Threatened
Hawksbill Sea Turtle *Eretmochelys imbricata* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3656	Endangered
Kemp's Ridley Sea Turtle *Lepidochelys kempii* There is **proposed** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/5523	Endangered
Leatherback Sea Turtle *Dermochelys coriacea* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1493	Endangered
Loggerhead Sea Turtle *Caretta caretta* Population: Northwest Atlantic Ocean DPS There is **final** critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1110	Threatened

Amphibians

NAME	STATUS
Frosted Flatwoods Salamander *Ambystoma cingulatum* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4981	Threatened

Flowering Plants

NAME	STATUS
Pondberry *Lindera melissifolia* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1279	Endangered

Critical habitats

There are 2 critical habitats wholly or partially within your project area under this office's jurisdiction.

NAME	STATUS
Loggerhead Sea Turtle *Caretta caretta* https://ecos.fws.gov/ecp/species/1110#crithab	Final
Piping Plover *Charadrius melodus* https://ecos.fws.gov/ecp/species/6039#crithab	Final

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel *Falco sparverius paulus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 1 to Aug 31
American Oystercatcher *Haematopus palliatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8935	Breeds Apr 15 to Aug 31

NAME	BREEDING SEASON
Bachman's Sparrow *Aimophila aestivalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6177	Breeds May 1 to Sep 30
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Black Scoter *Melanitta nigra* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Black Skimmer *Rynchops niger* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5234	Breeds May 20 to Sep 15
Bonaparte's Gull *Chroicocephalus philadelphia* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Brown Pelican *Pelecanus occidentalis* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/6034	Breeds Jan 15 to Sep 30
Clapper Rail *Rallus crepitans* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 10 to Oct 31
Common Eider *Somateria mollissima* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jun 1 to Sep 30
Common Ground-dove *Columbina passerina exigua* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Feb 1 to Dec 31

NAME	BREEDING SEASON
Common Loon *gavia immer* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/4464	Breeds Apr 15 to Oct 31
Common Tern *Sterna hirundo* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/4963	Breeds May 10 to Sep 10
Double-crested Cormorant *phalacrocorax auritus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/3478	Breeds Apr 20 to Aug 31
Dunlin *Calidris alpina arcticola* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Eastern Whip-poor-will *Antrostomus vociferus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
Golden Eagle *Aquila chrysaetos* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds elsewhere
Great Black-backed Gull *Larus marinus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Apr 15 to Aug 20
Gull-billed Tern *Gelochelidon nilotica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9501	Breeds May 1 to Jul 31
Henslow's Sparrow *Ammodramus henslowii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31

NAME	BREEDING SEASON
Herring Gull *Larus argentatus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Apr 20 to Aug 31
Kentucky Warbler *Oporornis formosus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20
King Rail *Rallus elegans* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8936	Breeds May 1 to Sep 5
Le Conte's Sparrow *Ammodramus leconteii* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Least Tern *Sterna antillarum* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 20 to Sep 10
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Long-tailed Duck *Clangula hyemalis* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/7238	Breeds elsewhere
Magnificent Frigatebird *Fregata magnificens* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Manx Shearwater *Puffinus puffinus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Apr 15 to Oct 31
Marbled Godwit *Limosa fedoa* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds elsewhere

NAME	BREEDING SEASON
Nelson's Sparrow *Ammodramus nelsoni* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Northern Gannet *Morus bassanus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Parasitic Jaeger *Stercorarius parasiticus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Pomarine Jaeger *Stercorarius pomarinus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Prairie Warbler *Dendroica discolor* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Prothonotary Warbler *Protonotaria citrea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
Purple Sandpiper *Calidris maritima* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Razorbill *Alca torda* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jun 15 to Sep 10
Red Phalarope *Phalaropus fulicarius* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Red-breasted Merganser *Mergus serrator* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere

NAME	BREEDING SEASON
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Red-necked Phalarope *Phalaropus lobatus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Red-throated Loon *Gavia stellata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Ring-billed Gull *Larus delawarensis* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Royal Tern *Thalasseus maximus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Apr 15 to Aug 31
Ruddy Turnstone *Arenaria interpres morinella* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Rusty Blackbird *Euphagus carolinus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Seaside Sparrow *Ammodramus maritimus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 20
Semipalmated Sandpiper *Calidris pusilla* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere

NAME	BREEDING SEASON
Surf Scoter *Melanitta perspicillata* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Swallow-tailed Kite *Elanoides forficatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8938	Breeds Mar 10 to Jun 30
Whimbrel *Numenius phaeopus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483	Breeds elsewhere
White-winged Scoter *Melanitta fusca* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 5
Wilson's Plover *Charadrius wilsonia* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Aug 20
Wilson's Storm-petrel *Oceanites oceanicus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Wood Thrush *Hylocichla mustelina* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31
Yellow Rail *Coturnicops noveboracensis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9476	Breeds elsewhere

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the

FAQ “Proper Interpretation and Use of Your Migratory Bird Report” before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

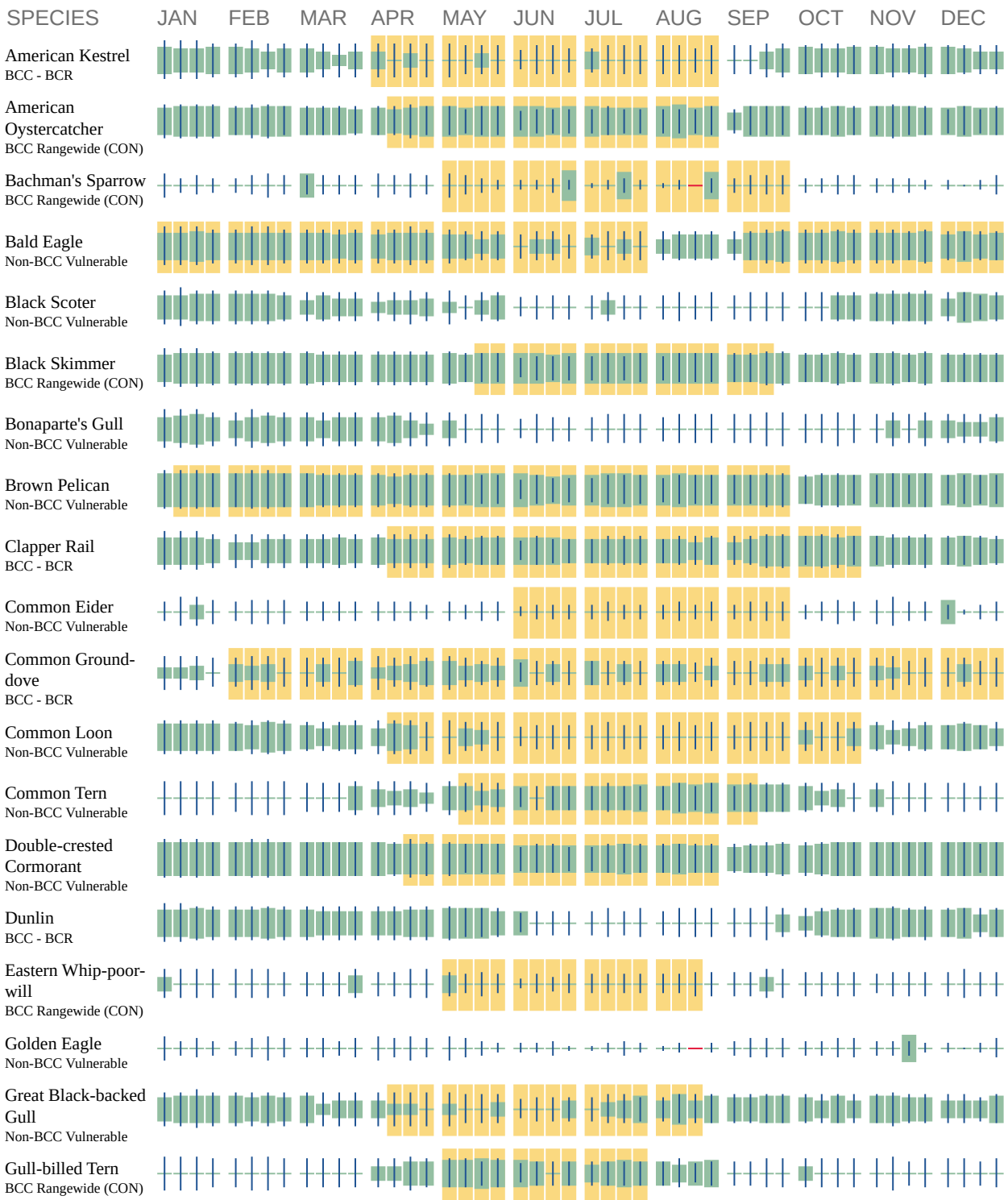
Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

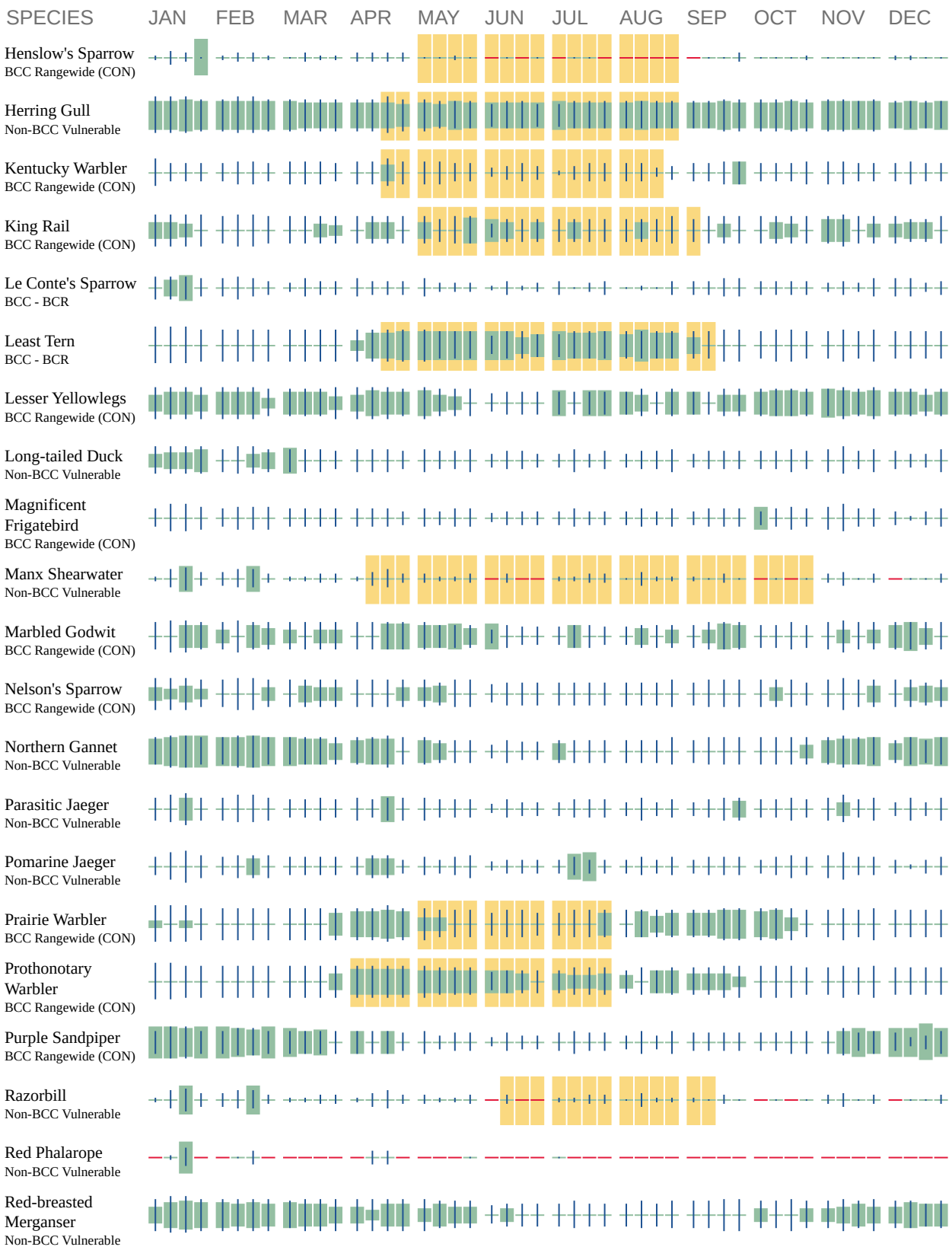
Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

probability of presence breeding season survey effort no data




SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
Henslow's Sparrow
BCC Rangewide (CON)
Herring Gull
Non-BCC Vulnerable
Kentucky Warbler
BCC Rangewide (CON)
King Rail
BCC Rangewide (CON)
Le Conte's Sparrow
BCC - BCR
Least Tern
BCC - BCR
Lesser Yellowlegs
BCC Rangewide (CON)
Long-tailed Duck
Non-BCC Vulnerable
Magnificent Frigatebird
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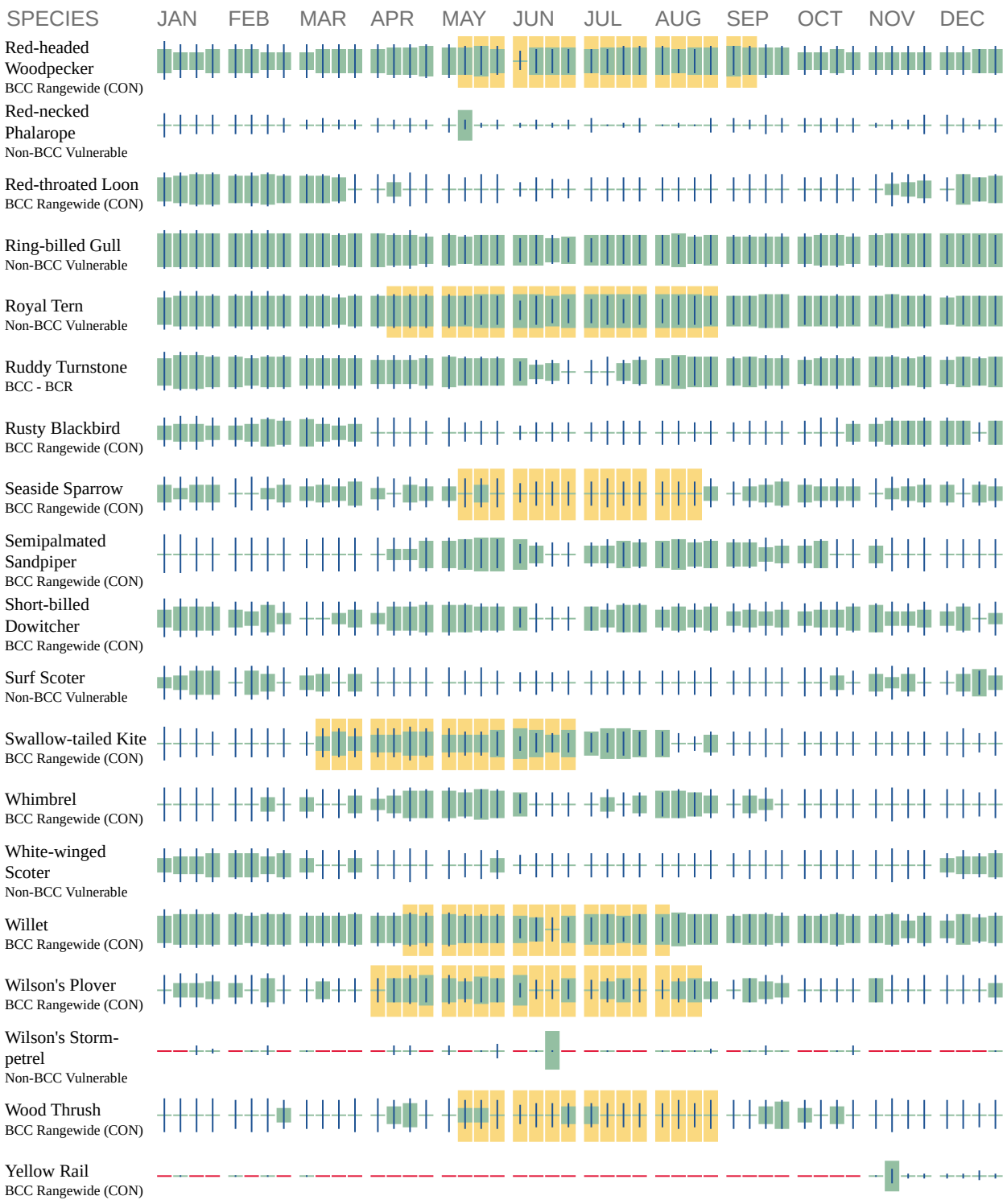
Pomarine Jaeger
Non-BCC Vulnerable
Prairie Warbler
BCC Rangewide (CON)
Prothonotary Warbler
BCC Rangewide (CON)
Purple Sandpiper
BCC Rangewide (CON)
Razorbill
Non-BCC Vulnerable
Red Phalarope
Non-BCC Vulnerable
Red-breasted Merganser
Non-BCC Vulnerable



Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php

- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.
Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?
The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?
The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and

how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?
To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?
Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects
For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?
If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report
The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ “What does IPaC use to generate the migratory birds potentially occurring in my specified location”. Please be aware this report provides the “probability of presence” of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ “Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds” at the bottom of your migratory bird trust resources page.

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

U. S. Fish and Wildlife Service
RG Stephens, Jr. Federal Building
355 E. Hancock Ave., Rm 320, Box 7
Athens, GA 30601 ; 706-613-9493

FWS Log No.
2021-0202

Leopoldo Miranda, Director
USFWS Southeast Regional Offi
1875 Century Blvd.
Atlanta, GA 30345

Based on information provided, we concur with your determination that the project is not likely to adversely affect federally-listed species. No further ESA Section 7 action is required, unless the project changes, a new species is listed, or new data indicate impacts to listed species may occur.

Donald W. Imm, Ph.D., Field Supervisor

Oct 27, 2020
Date

Greetings Mr. Miranda,

U.S. Coast Guard (USCG) Station Tybee is located on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument. This critical Station, which was already in need of major repairs and upgrades, suffered substantial damage during Hurricane Matthew. The USCG now plans to recapitalize and rebuild the Station with modern facilities that meet today's standards to better serve the USCG's various missions and harden the Station's infrastructure for future resiliency.

The scope of work for the Proposed Action includes: replacing the existing Station and support buildings with a new multi-mission building, repairing stone rip-rap along the Station shoreline, upgrading/replacing the NPS wastewater treatment system; upgrading an existing NPS boat ramp, and upgrading the NPS existing potable water system.

In accordance with the National Environmental Policy Act, the USCG is completing an Environmental Assessment for this proposed action. Part of this process includes an evaluation of the project's impact on endangered species and critical impact. The enclosed document provides this evaluation, which concludes that the Proposed Action will not impact endangered species or destroy or adversely modify their critical habitat. We respectfully request your concurrence with this evaluation. If further information is required, please contact Mr. Richard Hylton, at (757) 852-3404 or by e-mail at rick.d.hylton@uscg.mil.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: (1) USCG Station Tybee Rebuild Project - Evaluation of Effects on Federally Listed Species and Critical Habitats

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
OCT 2 2 2020

National Marine Fisheries Service
Southeast Regional Office
Mary Wunderlich
263 13th Avenue South
St. Petersburg, FL 33701

Greetings Mr. Wunderlich,

In accordance with the Endangered Species Act, the United States Coast Guard (USCG) is requesting informal consultation with your office for a proposed construction project that will rebuild USCG Station Tybee, located on Cockspur Island, Georgia. The "Proposed Action" includes the replacement of the existing hurricane damaged Station and associated infrastructure with a new Multi-Mission Station Building. In addition, the Station's existing shoreline riprap revetment will be repaired, and an existing boat ramp will be upgraded to accommodate small USCG small boats up to 36-feet in length.

The enclosed evaluation explores the anticipated effects that this project may have on federally listed endangered species and critical habitats under your jurisdiction. Based on our assessment, we have concluded that the "Proposed Action" would have no effect on the North Atlantic Right Whale, Leatherback Sea Turtle, Hawksbill Sea Turtle, the North Atlantic Right Whale southeastern calving area critical habitat, and the Loggerhead Sea Turtle nearshore reproductive critical habitat. Furthermore, the USCG has determined that the "Proposed Action" may affect, but is not likely to adversely affect, the Loggerhead Sea Turtle, Green Sea Turtle, Kemps Ridley Sea Turtle, Shortnose Sturgeon, Atlantic Sturgeon, and critical habitat for the Atlantic Sturgeon South Atlantic Distinct Population Segment.

We respectfully request your concurrence with this evaluation. If further information is required, please contact Mr. Richard Hylton, at (757) 852-3404 or by e-mail at rick.d.hylton@uscg.mil.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: (1) USCG Station Tybee Rebuild Project - Evaluation of Effects on Federally Listed Species and Critical Habitats under the Jurisdiction of the National Marine Fisheries Service

USCG STATION TYBEE REBUILD STATION PROJECT

EVALUATION OF EFFECTS ON FEDERALLY LISTED SPECIES AND CRITICAL HABITATS UNDER THE JURISDICTION OF THE NATIONAL MARINE FISHERIES SERVICE

USCG Station Tybee, Cockspur Island, Chatham County, Georgia

October 2020

Prepared for:

United States Coast Guard
Facilities Design and Construction Center 5505 Robin Hood Rd, Suite K
Norfolk, VA 23513

and

Arcadis U.S. , Inc.
Atlanta, Georgia

Prepared by:
Dial Cordy and Associates Incorporated
Wilmington, NC

ENCLOSURE (1)

1.0 DESCRIPTION OF THE ACTION AREA

USCG Station Tybee is located approximately 3.5 miles west of the Atlantic Ocean on Cockspur Island in the Savannah River Estuary (Figure 1). Most of Cockspur Island, including Station Tybee, is encompassed by Fort Pulaski National Monument administered by the National Park Service (NPS). The station occupies approximately 3.1 acres of improved and maintained uplands along the North Channel of the Savannah River (Figure 2). Onshore facilities include a main station building, main shops building, and a number of small supporting facility buildings. Waterfront infrastructure consists of an L-shaped pier with two floating docks that are used by the Coast Guard Cutter Pompano and smaller vessels. The action area also encompasses an existing NPS boat ramp located ~500 feet (ft) east of the Station. The existing ramp structure is a series of 10 x 10-ft concrete slabs extending ~70 ft seaward of mean high water (MHW) to a depth of approximately +2.0 ft mean lower low water (MLLW) in the North Channel. The north-central shoreline of Cockspur Island is armored by a ~3,600-ft-long riprap revetment that was constructed in the early 1970s to protect Station Tybee and the adjacent Savannah Bar Pilots facility. The revetment toe is located ~20 ft seaward of MHW in the North Channel intertidal zone. Shoreline erosion has undermined portions of the revetment, resulting in displacement and seaward slumping of the riprap material.

The action area is located in the lowermost portion of the Savannah River Estuary where salinities are relatively high. Mean daily salinities in the North Channel at the Fort Pulaski USGS gage station are lowest (~20-22 parts per thousand [ppt]) during the months of January through March and highest (~24-26 ppt) during the months of July through October. Mean tidal range in the North Channel at the Fort Pulaski gage station is 6.92 ft. Benthic investigations that included side-scan sonar surveys were conducted to identify and characterize intertidal and subtidal benthic habitats within the action area (Dial Cordy and Associates 2020). Benthic habitats of the uppermost intertidal zone consist of granite riprap that is non-vegetated and generally devoid of sessile invertebrates. Small clumps of smooth cordgrass (*Spartina alterniflora*) are scattered amongst the slumping riprap in the vicinity of the NPS boat ramp, but emergent tidal wetlands are otherwise absent from the action area. Intertidal and subtidal benthic habitats beyond the toe of the revetment consist of unconsolidated soft bottom. Benthic investigations did not detect any submerged aquatic vegetation or oyster reef/shell bottom habitat in the action area.

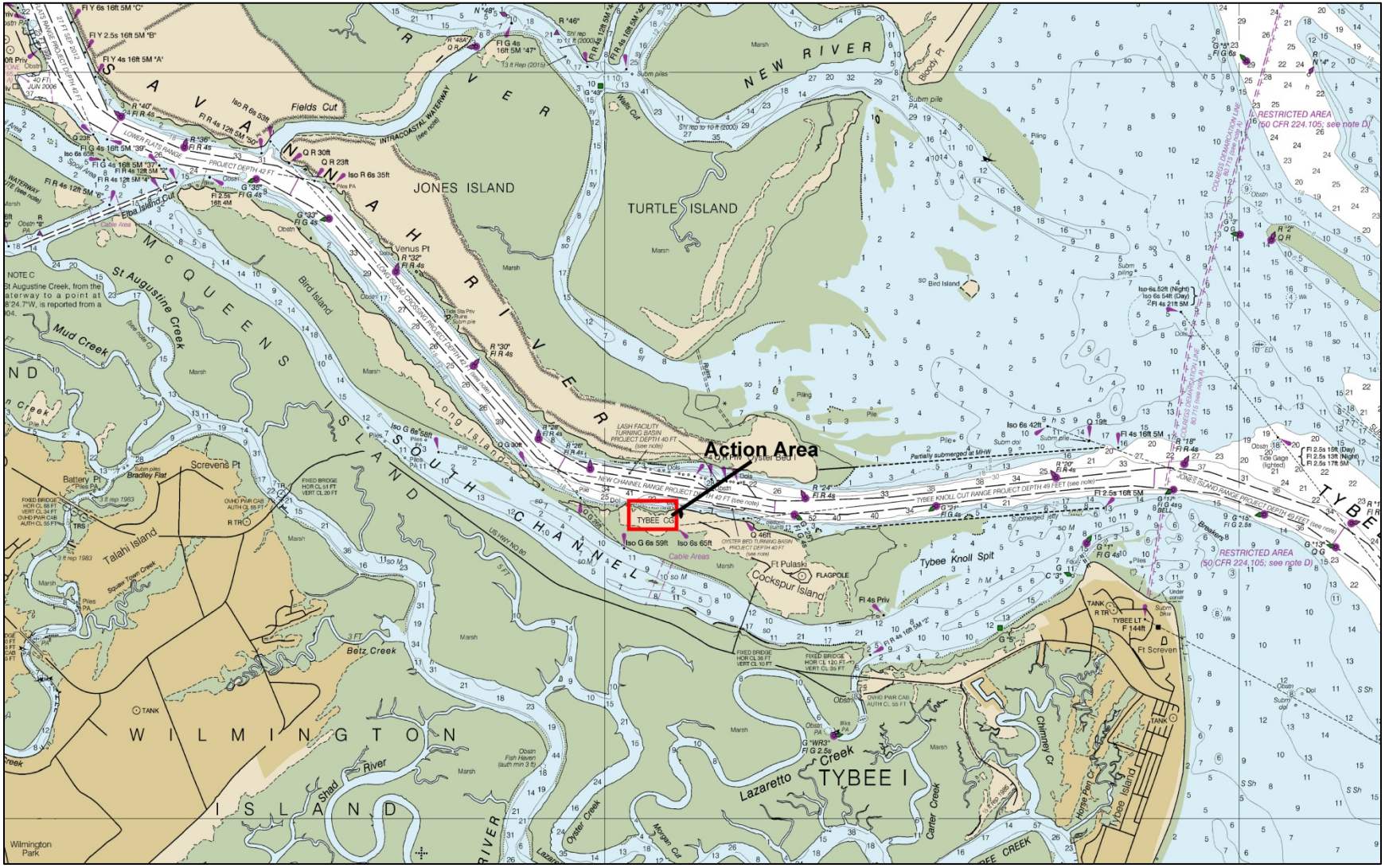


Figure 1. Action Area Location Map.

Figure 2. Action Area - U.S. Coast Guard Station Tybee Rebuild Station Project, Cockspur Island, Georgia.

2.0 DESCRIPTION OF THE PROPOSED ACTION

The following description of the Proposed Action is based on conceptual design plans that are appropriate for the National Environmental Policy Act (NEPA) review phase of project development. While the described construction methods and equipment types are considered those most likely to be employed based on similar in-water projects, specific construction methods will be determined by the contractor. Any changes in the Proposed Action design and/or construction methods will be coordinated with NMFS through the Section 7 consultation process.

2.1 Onshore Facilities Rebuild and Water/Wastewater Systems Upgrades

The Proposed Action would demolish the existing onshore facility buildings and construct a new Multi-Mission Station Building that would meet the station's operational requirements. Additionally, existing onshore water supply and wastewater treatment systems currently operated by the NPS would be upgraded. Demolition and construction activities would be confined to improved and maintained uplands that comprise the existing onshore Station area and areas farther inland. The onshore facilities rebuild component of the proposed action would not include any work below MHW. Erosion and sedimentation control measures would be installed and maintained in accordance with requirements of the Georgia Erosion and Sedimentation Control Act of 1975, as amended, to minimize sediment introduction into adjacent waters of the Savannah River.

2.2 Riprap Revetment Repairs

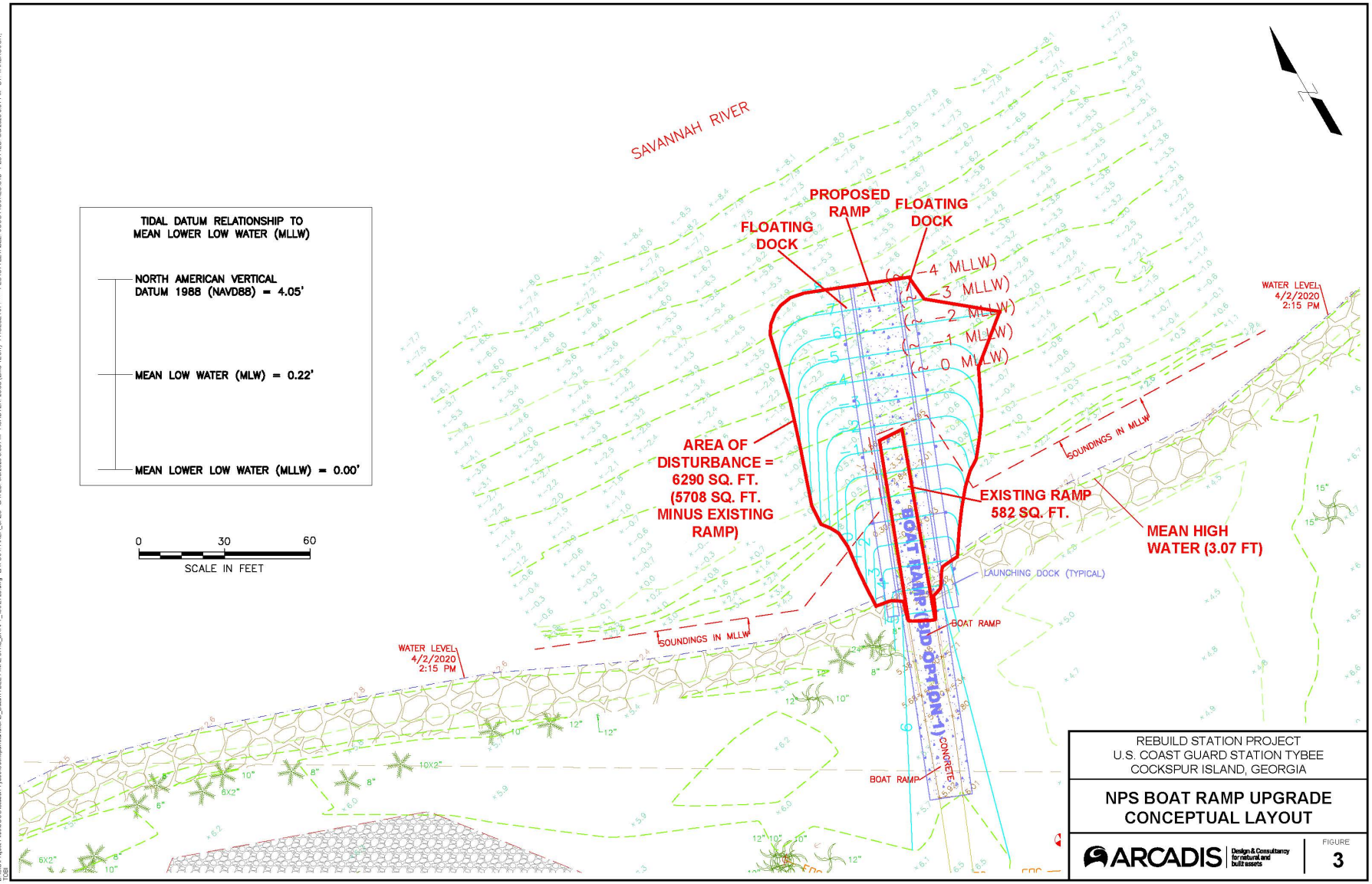
Work to repair damaged segments of the revetment would involve the repositioning of displaced riprap and the placement of new riprap as necessary to restore the structure to its originally constructed profile dimensions. The Proposed Action would not include any horizontal or vertical expansion of the revetment. The in-water work area would encompass the existing revetment footprint between MHW and the revetment toe. Some additional extraction of scattered displaced riprap from areas immediately seaward of the toe may also be undertaken. Riprap placement and repositioning would be accomplished by conventional heavy machinery such as excavators and/or cranes fitted with buckets or other grab type devices. Machinery would operate from uplands on the land side of the revetment and/or from floating barges in the North Channel. Best management practices (BMPs) would be employed during construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse effects. BMPs would be coordinated with NMFS as necessary.

2.3 Boat Ramp Replacement

The existing ramp structure is a series of 10 x 10-ft concrete slabs extending ~70 ft seaward of MHW to a depth of approximately +2.0 ft MLLW in the North Channel (Figure 3). Where possible, in-water work would occur at low tide. Existing slab removal would be accomplished by conventional heavy machinery such as an excavator and/or crane with an appropriate grab type device. Machinery would operate from the existing concrete ramp surface and/or from floating barges in the North Channel. If operations are conducted from the existing ramp,

machinery would remain on the existing concrete structure at all times while working backwards from the seaward end of the structure. Individual slabs would be extracted intact and placed onshore above MHW for subsequent processing and transport to an upland disposal site. BMPs would be implemented to minimize sedimentation, runoff, and contain suspended sediments as necessary and would be coordinated with NMFS.

The new ramp would consist of an expanded concrete structure approximately 15 ft-wide and extending approximately 120 ft seaward of MHW to a depth of approximately -4.0 ft MLLW in the North Channel (Figure 3). Pile-anchored parallel floating docks approximately 4 ft wide and 120 ft long would be installed along either side of the new ramp. Initial bottom recontouring to establish the design ramp grade and transitional side slopes would disturb a total intertidal/subtidal bottom area of ~6,290 square feet (0.14 acre), resulting in maximum bottom depth increases of approximately 1 to 2 ft. Recontouring would be conducted by a barge-mounted excavator or clamshell/bucket crane. Any excess material would be placed in a scow or barge for subsequent transport to an approved upland disposal facility. New ramp construction would involve lift-in placement of precast concrete slabs by a barge-mounted crane. Once installed, riprap would be placed along the margins of the new ramp to prevent undercutting by high velocity currents in the North Channel. Riprap placement would be accomplished by a barge-mounted excavator and/or bucket-type crane. Floating dock installation would employ a vibratory hammer to drive a total of four steel anchor piles, one each at the seaward and landward ends of the two docks. During all in-water construction activities, BMPs would be implemented as necessary to contain sediment resuspension and minimize sedimentation and runoff. BMPs would be coordinated with NMFS as necessary. The overall in-water construction footprint of disturbance; including the ramp/riprap footprint, side slopes, and dock piles; would encompass ~6,290 square feet (0.14 acre) of intertidal/subtidal bottom in the North Channel (Figure 3).


TIDAL DATUM RELATIONSHIP TO
MEAN LOWER LOW WATER (MLLW)
NORTH AMERICAN VERTICAL
DATUM 1988 (NAVD88) = 4.05'
MEAN LOW WATER (MLW) = 0.22'
MEAN LOWER LOW WATER (MLLW) = 0.00'
0
30
60
SCALE IN FEET
SAVANNAH RIVER
FLOATING
DOCK
PROPOSED
RAMP
FLOATING
DOCK
(~ -4 MLLW)
(~ -3 MLLW)
(~ -2 MLLW)
(~ -1 MLLW)
(~ 0 MLLW)
AREA OF
DISTURBANCE =
6290 SQ. FT.
(5708 SQ. FT.
MINUS EXISTING
RAMP)
EXISTING RAMP
582 SQ. FT.
MEAN HIGH
WATER (3.07 FT)
WATER LEVEL
4/2/2020
2:15 PM
SOUNDINGS IN MLLW
LAUNCHING DOCK (TYPICAL)
BOAT RAMP
BOAT RAMP (2ND OPTION-1) CONCRETE
REBUILD STATION PROJECT
U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
NPS BOAT RAMP UPGRADE
CONCEPTUAL LAYOUT
ARCADIS
Design & Consultancy for natural and built assets
FIGURE
3

3.0 FEDERALLY LISTED SPECIES AND CRITICAL HABITATS THAT MAY OCCUR IN THE VICINITY OF THE ACTION AREA

Table 1. Federally listed species that may occur in the vicinity of the action area.

Common Name	Scientific Name	Federal Status	Effect Determination[1]
North Atlantic right whale	*Eubalaena glacialis*	Endangered	NE
Leatherback sea turtle	*Dermochelys coriacea*	Endangered	NE
Hawksbill sea turtle	*Eretmochelys imbricata*	Endangered	NE
Loggerhead sea turtle	*Caretta caretta*	Threatened	MANLAA
Green sea turtle	*Chelonia mydas*	Threatened	MANLAA
Kemps ridley sea turtle	*Lepidochelys kempii*	Endangered	MANLAA
Shortnose sturgeon	*Acipenser brevirsotrum*	Endangered	MANLAA
Atlantic sturgeon	*Acipenser oxyrinchus oxyrinchus*	Endangered	MANLAA

[1] NE = No Effect, MANLAA = May Affect, Not Likely to Adversely Affect

Table 2. Designated critical habitats in the vicinity of the action area.

Critical Habitat	Unit ID	Description	Effect Determination[1]
Loggerhead Sea Turtle Nearshore Reproductive	LOGG-N-10	MHW to 1.6 km offshore from Tybee Creek Inlet to Wassaw Sound.	NE
North Atlantic Right Whale Southeastern Calving Area	Unit 2	Ocean waters seaward of COLREGS[2] line across Savannah River mouth.	NE
Atlantic Sturgeon South Atlantic DPS	Unit 3	Savannah River from river mile 0 to New Savannah Bluff Lock and Dam.	MANLAA

[1] NE = No Effect, MANLAA = May Affect, Not Likely to Adversely Affect

[2] Seaward of the U.S. collision regulation boundary, which is the line of demarcation that delineates those waters upon which mariners will comply with the International Regulations for Preventing Collisions at Sea, 1972 and the waters upon which mariners will comply with the Inland Navigation Rules.

4.0 EFFECTS OF THE PROPOSED ACTION ON LISTED SPECIES AND CRITICAL HABITATS

4.1 North Atlantic Right Whale and Southeastern Calving Area Critical Habitat

North Atlantic right whales may be present in nearshore ocean waters seaward of the Savannah River mouth during the migration and calving season. Sightings data indicate that the peak period of right whale occurrence within a 40-mile radius of the Savannah River mouth is December through March (Knowlton et al. 2002). Nearshore waters seaward of the COLREGS line across the Savannah River mouth are part of the right whale southeastern calving area critical habitat unit that extends along the coast from central Florida to Cape Fear, North Carolina. Although potentially present in nearshore waters, right whales are not expected to enter the relatively shallow waters of the Savannah River Estuary. The Proposed Action would not include ocean disposal or any offshore vessel operations that would potentially present a collision risk to right whales. Furthermore, based on the location of the action area ~3.5 miles upriver of the ocean, no acoustic effects on the right whale or its critical habitat would be anticipated. Therefore, it is determined that the Proposed Action would have no effect on the North Atlantic right whale and its designated critical habitat.

4.2 Sea Turtles and Loggerhead Nearshore Reproductive Critical Habitat

Leatherback and hawksbill sea turtles are not expected to occur in the estuarine waters of the action area. The leatherback is a pelagic species of deep, offshore waters, and the hawksbill is strongly associated with coral reef and hard bottom habitats that are not present in the action area. Therefore, it is determined that the Proposed Action would have no effect on leatherback and hawksbill sea turtles.

Loggerhead, green, and Kemps ridley sea turtles may forage in estuarine waters of the action area during the warmer months. Monthly abundance surveys detected sea turtles in the Savannah Harbor entrance channel from April through December when water temperatures were ≥14° C; whereas no sea turtles were detected during the months of January, February, and March when water temperatures were <14° C (Dickerson et al. 1995). The Proposed Action may affect loggerhead, green, and Kemps ridley sea turtles through acoustic disturbance, sediment suspension, and direct impacts on soft bottom foraging habitat. The principal source of potential acoustic effects would be the driving of four steel piles to anchor the floating docks. A vibratory hammer would be used to reduce the potential for pile driving noise effects on sea turtles. Based on a previous assessment of pile driving noise for replacement of the Fort Pulaski Bridge across the South Channel of the Savannah River (NMFS 2012), the use of a vibratory hammer would eliminate the potential for injurious acoustic effects on sea turtles and limit potential behavioral effects to a small area within ~33 ft of the piles. Based on the seaward-most pile location, the potential for behavioral noise effects would be limited to waters within ~163 ft of the shoreline, whereas the North Channel is >2,000 ft wide at the pile driving location. Thus, noise effects would not restrict sea turtle movements within the estuary. Given the small number of piles (n=4), it is anticipated that any behavioral effects on sea turtles would be negligible.

Sediment suspension and associated increases in turbidity may affect the foraging activities of sea turtles. As a measure to reduce the extent and duration of sediment suspension effects, in-water work would be conducted at low tide where possible. Additionally, BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse effects. BMPs would be coordinated with NMFS as necessary. Boat ramp construction, including the placement of concrete slabs and marginal riprap, would result in the loss of ~5,710 square feet (0.13 acre) of potential soft bottom foraging habitat. However, given the vast extent of soft bottom habitat within the lower Savannah River Estuary, it is anticipated that any effects on sea turtles would be negligible. Based on all of the above considerations, it is determined that the Proposed Action may affect, but is not likely to adversely affect loggerhead, green, and Kemp's ridley sea turtles.

Nearshore reproductive critical habitat for the loggerhead sea turtle encompasses waters along the Tybee Island oceanfront beach from MHW to 1.6 km offshore. Based on the location of the action area ~3.5 miles inshore of the critical habitat boundary, it is determined that the Proposed Action would have no effect on loggerhead nearshore reproductive critical habitat.

4.3 Shortnose Sturgeon, Atlantic Sturgeon, and Atlantic Sturgeon Critical Habitat

As reported by Collins et al. (2001), the movements of acoustically tagged juvenile shortnose sturgeon in the Savannah River Estuary were confined to an approximately 10-mile reach between river mile (rm) 19.4 and rm 29.5. Juveniles exhibited seasonal migration patterns within the 10-mile reach, moving upriver during periods of high water temperature (>22 C) and downriver during periods of low water temperature (<22 C). Adult shortnose sturgeon exhibited a similar pattern of seasonal upstream and downstream movements; however, downstream movements were more extensive, with the lowermost detections of two individuals occurring at rm 3.4 during December. Studies in the Altamaha River have detected similar downstream movements by shortnose sturgeon to lower estuarine habitats near the river mouth during the coldest months (Ingram 2014, Devries 2006). These studies indicate that adult shortnose sturgeon may be present in the action area during seasonal low water temperature periods. Adult Atlantic sturgeon may transit the action area during spawning migration periods. Telemetry studies indicate the occurrence of separate spring and fall spawning migration runs in the Savannah River (Vine et al. 2019). Subadult Atlantic sturgeon undertake non-spawning seasonal migrations between estuarine summer foraging habitats and coastal wintering grounds (Post et al. 2014), and thus may also transit the action area during the spring and fall. Pre-migratory juvenile Atlantic sturgeon generally remain within low salinity waters in the vicinity of the fresh-brackish water interface (ASSRT 2007), and thus are not expected to occur in the high salinity waters of the action area.

The Proposed Action may affect shortnose and Atlantic sturgeon through acoustic disturbance, sediment suspension, and direct impacts on soft bottom foraging habitat. The principal source of potential acoustic effects would be the driving of four steel piles to anchor the floating docks. A vibratory hammer would be used to reduce the potential for pile driving noise effects on sturgeon. Based on a previous assessment of pile driving noise for replacement of the Fort

Pulaski Bridge across the South Channel of the Savannah River (NMFS 2012), the use of a vibratory hammer would eliminate the potential for injurious acoustic effects on sturgeon and limit potential behavioral effects to a small area within ~155 ft of the piles. Based on the seaward-most pile location, the potential for behavioral noise effects would be limited to waters within ~285 ft of the shoreline, whereas the North Channel is >2,000 ft wide at the pile driving location. Thus, noise effects would not impede upriver movements of migrating sturgeon. Given the small number of piles (n=4), it is anticipated that any behavioral effects on sturgeon would be negligible. Sediment suspension and associated increases in turbidity may affect the foraging activities of sturgeon. As a measure to reduce the extent and duration of sediment suspension effects, in-water work would be conducted at low tide where possible. Additionally, BMPs would be employed during all demolition and construction work that are effective, practical, structural, or nonstructural methods that prevent or reduce the movement of sediment, nutrients, pesticides, and other pollutants from upland into surface waters, or which otherwise protect water quality from potential adverse effects. BMPs would be coordinated with NMFS as necessary. Boat ramp construction, including the placement of concrete slabs and marginal riprap, would result in the loss of ~5,710 square feet (0.13 acre) of potential soft bottom foraging habitat. However, given the vast extent of soft bottom habitat within the lower Savannah River Estuary, it is anticipated that any effects on sturgeon would be negligible. Based on all of the above considerations, it is determined that the Proposed Action may affect, but is not likely to adversely affect shortnose and Atlantic sturgeon.

The Savannah River from rm 0 to New Savannah Bluff Lock and Dam is designated critical habitat for the Atlantic Sturgeon South Atlantic DPS. The physical or biological features of Atlantic sturgeon critical habitat that are essential to the conservation of the species include hardbottom substrate in low salinity waters for egg settlement and early life stage development; aquatic habitat encompassing a gradual salinity gradient (0.5-30 ppt) and soft bottom (sand/mud) substrate for juvenile foraging and development; waters of sufficient depth and absent physical barriers to passage to support unimpeded movements of adults, subadults, and juveniles; and water quality conditions (temperature and oxygen) that support spawning, survival, development, and/or recruitment of the various life stages (82 FR 39160). As described above, construction activities and the noise effects associated with vibratory pile driving would be confined to relatively shallow waters within ~285 ft of shore, whereas the North Channel is >2,000 ft wide. Thus the Proposed Action would not impede upriver movements of migrating sturgeon. The principal impact of the Proposed Action on essential habitat features would be the permanent loss of ~5,710 square feet (0.13 acre) of soft bottom foraging habitat. However, given the location of the action area in the lowermost high-salinity portion of the estuary, it is unlikely that the associated soft bottom habitats currently support pre-migratory juvenile foraging and development. Furthermore, alternative soft bottom habitats are expansive within the lower estuary. Therefore, it is determined that the Proposed Action may affect, but is not likely to adversely affect critical habitat for the Atlantic Sturgeon South Atlantic DPS.

5.0 REFERENCES

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Vine, J. R., S. C. Holbrook, W. C. Post, and B. K. Peoples. 2019. Identifying environmental cues for Atlantic sturgeon and shortnose sturgeon spawning migrations in the Savannah River. Transactions of the American Fisheries Society, 148: 671-681

United States Department of the Interior

Fish and Wildlife Service
RG Stephens, Jr. Federal Building
355 E. Hancock Ave, Room 320, Box 7
Athens, GA 30601

West Georgia Sub Office
Post Office Box 52560
Fort Benning, Georgia 31995-2560

Coastal Georgia Sub Office
4980 Wildlife Drive, NE
Townsend, Georgia 31331

February 3, 2021

Captain J.F. Barresi
U.S. Coast Guard
5505 Robin Hood Road, Suite K
Norfolk, Virginia 23513
Attention: Mr. Richard Hylton

Re: USFWS Log Number 2021-0202 & 2021-1042

Dear Captain Barresi:

The U. S. Fish and Wildlife Service (Service) consulted with the U.S. Coast Guard (USCG) concerning the Station Tybee rebuild on Cockspur Island, Georgia on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument. Additionally, the USCG recently requested Service comments on the draft Environmental Assessment (dEA) for the project. In our email correspondence of October 27, 2020, we confirmed our concurrence with your Endangered Species Act (ESA) determination for the project. Since that time the eastern black rail *(Laterallus jamaicensis)* has become ESA listed as threatened. There has been no critical habitat designated for the black rail. We recommend that the USCG include an assessment of effects of the action to the eastern black rail in the dEA. These comments are provided by the Service in accordance with provisions of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*).

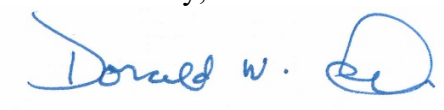
The eastern black rail is a secretive marsh bird whose habitat is higher elevations in tidal marsh dominated by saltmarsh cordgrass (*Spartina alterniflora*) and needlerush (*Juncus roemerianus*) and where these wetlands meet upland edges. Consider if this habitat type is present or borders the project site. Our desktop review of imagery of the project site indicates that the upland to aquatic interface is armored with no tidal marsh present.

An ESA determination of "No Effect" (NE) is appropriate when the action agency determines that its proposed action will not affect a listed species or its critical habitat. The Service does not provide concurrence for NE determinations. The Service would not object to a NE

determination if the above described site conditions are present and there is no habitat present for the eastern black rail.

We appreciate the opportunity to comment during the planning stages of your project. If you have any further questions, please contact our Coastal Georgia Sub-Office staff biologist, Bill Wikoff, at bill_wikoff@fws.gov or (912) 832-8739 extension 5.

Sincerely,



Donald W. Imm, PhD.
Field Supervisor

APPENDIX B

Section 106 Consultation and Native American Consultation

U.S. Department of Homeland Security

United States Coast Guard

Commanding Officer
United States Coast Guard
Facilities Design and Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000
05 November 2020

Jennifer Dixon, Program Manager
Environmental Review & Preservation Planning
Historic Preservation Division
2610 Georgia Highway 155 SW
Stockbridge, GA 30281

Dear Ms. Dixon,

In compliance with Section 106 of the National Historic Preservation Act, the U. S. Coast Guard (USCG) requests to initiate consultation with your office for a proposed undertaking to replace the existing 15,857-gross square foot (GSF) station facility and ancillary buildings totaling 23,936- GSF with a new 26,000-GSF Multi-Mission Station Facility at USCG Station Tybee, located on Cockspur Island, Georgia. The Station is situated on land under the jurisdiction of the National Park Service (NPS) within the bounds of Fort Pulaski National Monument Historic District. In addition to the new buildings, the proposed undertaking includes repairing the Station's shoreline rip-rap, upgrading existing water supply and wastewater treatment systems, and upgrading a NPS boat ramp located on the west side of the Station. The existing Station facilities have suffered considerable damage from past hurricanes and no longer meet modern USCG building and storm resiliencies standards.

The USCG is also preparing an Environmental Assessment pursuant to the National Environmental Policy Act. As part of this process, we recently completed a cultural resources study, which is one of three enclosed documents provided for your review. All the structures located on the current Station were built within the last 40 years, and there are no known unique features or architecture associated with them. In addition, there are no previously recorded archaeological sites located either within the Station's boundary or in water areas that would be disturbed by the proposed undertaking.

However, based on the current design for the proposed undertaking, the USCG, in consultation with the NPS, has determined that due to the increased height and scale of the new Station (albeit minimal), the undertaking will have an adverse effect on the Fort Pulaski National Monument National Register District. We propose to mitigate this adverse effect with a Memorandum of Agreement (MOA) and will follow-up in the next two weeks by inviting the Advisory Council on Historic Properties (ACHP) to participate and by providing your office and the NPS with an initial Draft MOA for your review.

In consultation with the NPS over the past year, the USCG has worked diligently to avoid ground-disturbing activities that may contain cultural and natural resources. There is one area related to the proposed potable water system work where cultural remains related to an 1830 ditch and embankment associated with the early phases of construction at Fort Pulaski and a possible Civil War-era causeway may be present. While this area has been previously filled with a substantial quantity of dredge spoils covering the entire area, we propose to provide for remote sensing in the area associated with ground disturbing activities. Should intact subsurface features be identified, the USCG will relocate project components to avoid these features. Finally, in areas proposed for ground disturbance outside of the Station compound, we propose to have a qualified archeologist monitor all ground disturbing activities. These details will all become part of a negotiated MOA.

We are looking forward to working with your office to meet all Section 106 requirements for this critical USCG undertaking. If you have any questions or concerns or if further information is required, please contact Mr. Richard Hylton, at (757) 852 – 3404 or by e-mail at rick.d.hylton@uscg.mil.

Sincerely,

Digitally signed by
BARRESI.JOHN.F.JRII.1187016629
Date: 2020.11.05 15:13:37 -05'00'

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosures: (1) Cultural Resources Overview / Section 106 Consultation
(2) Georgia Historic Preservation Division Environment Review Form
(3) Cultural Resources Assessment in support of the NEPA Environmental Assessment

Letter Enclosures

Three enclosures were provided to the Georgia State Historic Preservation Office (Office) along with the Section 106 Consultation Letter. Enclosure 1, Cultural Resources Overview is provided in Appendix D. Enclosure 2, Georgia Historic Preservation Division Environmental Review Form and Enclosure 3, Cultural Resources Assessment, are not provided due to the sensitive nature of information on archaeological resources included in the documents.

Brian P. Kemp
Governor

Georgia® Department of Community Affairs

Christopher Nunn
Commissioner

December 11, 2020

J. F. Barresi
Captain
United States Coast Guard
5505 Robin Hood Road, Suite K
Norfolk, Virginia 23513
Attn: Richard Hylton, Project Engineer

RE: Replace Station Building, Improve USCG Station Tybee, Cockspur Island
Chatham County, Georgia
HP-200827-033

Dear Captain Barresi:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced undertaking. Our comments are offered to assist the US Coast Guard (USCG) in complying with provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consist of demolishing the circa 1983 Station and support buildings, totaling 23,936-gross square foot (GSF), constructing a 26,000-GSF multi-mission building (MMB), repairing stone rip-rap along the Station shoreline, reconfiguring parking areas and internal Station roads, upgrading utilities and rehabilitating/replacing the existing wastewater treatment system, rehabilitating the existing circa 1950 National Park Service (NPS) boat ramp to accommodate USCG boats, rehabilitating the existing potable groundwater system, including constructing a new pump house, and modifying or demolishing the existing circa 1943 well head within USCG Station Tybee on Cockspur Island. Based on the submitted information and desktop research, HPD concurs that the subject project is within the National Register of Historic Places (NRHP)-listed Fort Pulaski National Monument. Additionally, HPD concurs that the circa 1943 well head and circa 1950 NPS boat ramp are non-contributing to the Fort Pulaski National Monument, due to a lack of integrity, significance, and association. However, HPD concurs that the proposed project will have an **adverse effect** on historic properties that are listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2), due to the direct impact of the project on the NRHP-listed Fort Pulaski National Monument and the increased height and scale of the proposed MMB. Furthermore, HPD finds that adequate measures have been taken to attempt to minimize or avoid the adverse effect, including exploring alternate locations, rehabilitation, and revised designs. Therefore, it appears that the adverse effect resulting from the undertaking is unavoidable.

HPD would like to note that this determination of an adverse effect is not the end of the Section 106 consultation process. When an adverse effect to a historic property is found, the federal agency must notify the Advisory Council on Historic Preservation (ACHP) of the determination and draft a Memorandum of Agreement (MOA) to resolve the adverse effect. Additionally, HPD acknowledges that the archaeological resource identification and assessment of effect has not been completed. Due to timeline constraints, HPD, NPS, and USCG have agreed to the completion of a MOA/Programmatic Agreement (PA) hybrid in order to address the adverse effect and complete the identification and assessment of effect for archaeological resources.

We look forward to working with you as this project continues. Please refer to project number **HP-200827-033** in any future correspondence regarding this project. If we may be of further assistance, please contact Aspen Kemmerlin, Compliance Archaeologist, at 770-389-7877 or aspen.kemmerlin@dca.ga.gov or Moira Church, Environmental Review Historian, at (770) 389-6285 or moira.church@dca.ga.gov.

V/r,

Dr. David Crass
Division Director
Deputy State Historic Preservation Officer

DCC/mmc

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

NOV 0 4 2020

Mr. Bryant Celestine
Alabama-Coushatta Tribe of Texas
571 State Park Road 56
Livingston, TX 77351

Greetings Mr. Celestine,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

The project's footprint is located on dredge spoils that have been periodically placed beginning in the late 1800s. At that time, most of this area was either submerged and part of the Savannah River or low lying marshlands transitioning from the River to the island's low lying uplands on the west side of the island.

Should any historical artifacts or human remains be discovered during construction activities, all work will be stopped until additional consultation with you and the Georgia State Historic Preservation Office is accomplished and the appropriate response or treatment actions are determined.

Please review the enclosed information, which provides additional details taken from our recent cultural reource investigations this past summer. If you have any questions or concerns or if further information is required, do not hestitate to contact me at (757) 852-3400 or by e-mail at john.f.barresi@uscg.mil.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Cultural Resources Overview

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

11000

NOV 0 4 2020

Ms. Janice Lowe
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883

Greetings Ms. Lowe,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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NOV 0 4 2020

Mr. Larry Haikey, Tribal Historic Preservation Officer
Poarch Band of Creeks
5811 Jack Springs Road
Atmore, AL 36502

Greetings Mr. Haikey,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Cultural Resources Overview

U.S. Department of Homeland Security

United States Coast Guard

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NOV 0 4 2020

Dr. Wenonah Haire, Tribal Historic Preservation Officer
Catawba Indian Nation
1536 Tom Steven Road
Rock Hill, SC 29730

Greetings Dr. Haire,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Cultural Resources Overview

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791

December 7, 2020

Attention: John F. Barresi
U.S. Dept. of Homeland Security
5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431

Re. THPO #	TCNS #	Project Description
2021-60-1		Replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility

Dear Mr. Barresi,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Caitlin Rogers for

Wenonah G. Haire
Tribal Historic Preservation Officer

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
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Fax: 757-852-3495

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NOV 0 4 2020

Dr. Linda Langley, Tribal Historic Preservation Officer
Coushatta Tribe of Louisiana
P.O. Box 10
Elton, LA 70532

Greetings Dr. Langley,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Captain, U. S. Coast Guard

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NOV 0 4 2020

Mr. David Cook, Tribal Administrator
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Greetings Mr. Cook,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

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NOV 0 4 2020

Mr. Billy Cypress, Chairman
Miccosukee Tribe of Indians
Tamiami Station P.O. Box 440021
Miami, FL 33144

Greetings Mr. Cypress,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

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NOV 0 4 2020

Ms. Corain Lowe-Zepeda, Tribal Historic Preservation Officer
Muscogee (Creek) Nation
P. O. Box 580
Okmulgee, OK 74447

Greetings Ms. Lowe-Zepeda,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

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Mr. David Frank, Tribal Historic Preservation Officer
Seminole Nation of Oklahoma
P. O. Box 1498
Wewoka, OK 74884

NOV 0 4 2020

Greetings Mr. Frank,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Cultural Resources Overview

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

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NOV 0 4 2020

Ms. Anne Mullins, Tribal Historic Preservation Officer
Seminole Tribe of Florida
30290 Josie Billie Hwy, PMB 1004
Clewiston, FL 33440

Greetings Ms. Mullins,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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U.S. Department of Homeland Security
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NOV 0 4 2020

Mr. Galen Cloud, Tribal Historic Preservation Officer
Thlopthlocco Tribal Town
P.O. Box 188
Okemah, OK 74859

Greetings Mr. Cloud,

In compliance with the National Historic Preservation Act, the U.S. Coast Guard Facilities Design and Construction Center is initiating consultation with your Tribe for a proposed construction project located on Cockspur Island, Georgia. The project includes the replacement of the Station Building and associated infrastructure with a new Multi-Mission Station Facility. Additionally, repairs and upgrades will be made to the rip-rap along the shoreline of the Savanah River, with upgrades to the existing water supply system, wastewater treatment system, and a boat ramp located to the east of the Station in the Savannah River. The Station is situated on land under the jurisdiction of the National Park Service within the bounds of Fort Pulaski National Monument Historic District.

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Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: Cultural Resources Overview

Letter Enclosures

One enclosure was provided to the Tribal Historic Preservation Officers (THPOs) along with the Tribal Consultation Letters. Enclosure 1, Cultural Resources Overview is provided in Appendix D.

APPENDIX C

Coastal Zone Management Act Consistency Determination

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

Commanding Officer
United States Coast Guard
Facilities Design & Construction Center

5505 Robin Hood Road, Suite K
Norfolk, VA 23513-2431
Phone: 757-852-3404
Fax: 757-852-3495

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OCT 0 7 2020

Doug Haymans, Director
Coastal Resources Division
Georgia Department of Natural Resources
One Conservation Way
Brunswick, GA 31520

Greetings Mr. Haymans,

In accordance with the Federal Consistency requirements of the Coastal Zone Management Act and Georgia's approved Coastal Zone Management Program, the U.S. Coast Guard (USCG) Facilities Design and Construction Center has conducted a Coastal Zone Management Federal Consistency Review for a proposed construction project at USCG Station Tybee located on Cockspur Island. We plan to replace the existing Station and Support Buildings with an approximately 26,000 sq. ft. new Multi-mission building. In addition to this new building, the water and sewage systems will be upgraded, parking lots will be reconfigured, the existing rip rap along the shoreline will be repaired, and an existing boat ramp located to the east of the Station will be repaired/upgraded.

The existing facilities were already inadequate based on modern USCG standards, and substantial damage caused by Hurricane Matthew has made this project a high priority in order to support this USCG Station and its critical daily operations. This project is considered a redevelopment project, as the existing Station is fully developed, and there are no changes in the number of personnel proposed at this facility.

Enclosed for your review and concurrence is the USCG's Consistency determination that this project is consistent with Georgia's coastal program policies to the maximum extent practicable. If you have any questions or need further information, please contact Mr. Richard Hylton at (757) 852-3404 or rick.d.hylton@uscg.mil.

Sincerely,

J. F. BARRESI
Captain, U. S. Coast Guard

Enclosure: (1) Federal Consistency Determination

FEDERAL CONSISTENCY DETERMINATION

REBUILD STATION AT UNITED STATES COAST GUARD STATION TYBEE

CHATAHM COUNTY, COCKSPUR ISLAND, GEORGIA

INTRODUCTION

The United States Coast Guard (USCG) is proposing the replacement and improvement of the existing Station Tybee, as well as the improvement of three (3) additional areas outside of the USCG Station Tybee within the Fort Pulaski National Monument on Cockspur Island, Georgia. This Proposed Action requires preparation of an Environmental Assessment in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code [USC] §§ 4321 et seq.); the President's Council on Environmental Quality (CEQ) *Regulations Implementing the Procedural Provisions of NEPA* (40 CFR Parts 1500-1508); Department of Homeland Security (DHS) Management Directive 023-01, *Implementation of NEP*A; and Coast Guard Commandant Instruction (COMDTINST 5090.1) *U.S. Coast Guard Environmental Planning Policy* and National Park Service (NPS) *Director's Order 12*.

PROJECT BACKGROUND

Chatham County is within the State of Georgia's designated coastal zone. Although Station Tybee, as a federally owned property, is statutorily exempt from the state's coastal zone policies, the Proposed Action could have reasonably foreseeable effects on coastal zone resources and enforceable policies of Georgia's federally approved Coastal Management Program (CMP). Therefore, the USCG has prepared this Federal Consistency Determination in accordance with Section 307(d) of the Coastal Zone Management Act (CZMA) of 1972 and 15 Code of Federal Regulations (CFR) Part 930, Subpart F to evaluate the Proposed Action's effects on those resources and enforceable policies. The USCG has determined that the Proposed Action would be consistent to the maximum extent practicable with the enforceable policies of the Georgia CMP.

In 2016, Hurricane Matthew caused extensive damage to onshore facilities at Station Tybee and, prior to this event, the Station was already in need of significant repairs and upgrades. Temporary facilities and reoccupied buildings do not meet functional space requirements prescribed in the USCG Shore Facilities Standards Manual (SFSM; COMDINST M11012.9) or USCG hurricane resistance and resiliency requirements.

PROPOSED ACTION

The USCG plans to recapitalize Station Tybee to better meet its various missions by providing modern facilities in compliance with current standards, as well as by hardening its infrastructure for future resiliency. Station Tybee is located on historic Cockspur Island within Fort Pulaski National Monument, which is under the jurisdiction of the National Park Service (NPS). Historic assets located and managed by the NPS on this island include Fort Pulaski National Monument, the Cockspur Island Lighthouse, and the remains of a Navy Base dating back to World War II.

The Proposed Action's scope of work includes activities within the Station Tybee compound area (Station Compound) and three additional nearby areas: Area A - southeast of the Station Compound; Area B - east of the Station Compound; and Area C - southeast of Area B. The enclosed **Figure 1** and **Figure 2** and text

below provide an overview of the general project site and a depiction of the specific areas of impact, respectively. Temporary facilities will be provided for USCG personnel and vessels to facilitate ongoing operations during the construction period. Work under the preferred Proposed Action includes the following:

- Demolition and replacement of several Station Tybee structures, including Buildings 101, 102, 109, and ANT Building, as well as associated pavement expansion and utilities extension;
- Upgrade of the existing NPS wastewater treatment system within Area A;
- Repair/upgrade of the existing NPS potable water system within Area C; and
- Repair/expansion of the NPS Boat Ramp site within Area B.

RELEVANT ENFORCEABLE POLICIES

The State of Georgia's federally approved CMP is administered by the Georgia Department of Natural Resources' (DNR) Coastal Resources Division (CRD). Federal agency actions that may impact coastal zone resources must be carried out in a manner that is consistent to the maximum extent practicable with the enforceable policies of the state's CMP (16 U.S. C. Section 1456(c)). Enforceable policies of Georgia's coastal management program consist of the following:

Coastal Marshlands Protection Act – O.C.G.A. 12-5-280, et seq.

The Coastal Marshlands Protection Act limits certain activities and structures in marsh areas and requires permits for other activities and structures. "Erecting structures, dredging, or filling marsh areas . . ." requires a permit. Protection under the Act extends to "coastal marshlands" or "marshlands", which includes marshland, intertidal area, mudflats, tidal water bottoms, and salt marsh area within the estuarine area of the state, whether or not the tidewaters reach the littoral areas through natural or artificial watercourses. The estuarine area includes "all tidally influenced waters".

A survey of the in-water portions of the project area determined that benthic habitat within the survey area is generally comprised primarily of silt/clay (mud) intermixed with varying quantities and types of shell fragments. The only hard substrate that was identified was associated with the granite riprap along the Station Tybee shoreline. Seagrasses, other submerged aquatic vegetation and corals were not observed in any of the grab samples or during any of the video surveys. It is unlikely that seagrass or coral resources are present in this area due to the prevailing conditions (i.e. low light, high current). The only organisms identified during the surveys were sessile organisms (i.e. barnacles, oysters, and hydroids) attached to the lower portions of the riprap.

It is anticipated that the Proposed Action would cover an additional 582 square feet of tidal water bottoms (i.e. the Savannah River) from placement of the concrete boat ramp and stone armoring to protect the boat ramp from the souring effects of currents within the Savannah River. During construction of the ramp, approximately 5,708 square feet of tidal water bottom below mean high water (MHW) would be temporarily disturbed. Although some tidal bottom area would be permanently lost to the upgraded boat ramp, the area of impact is relatively minor. All land-disturbing activities would be performed in accordance with the BMPs outlined in the Georgia Erosion and Sedimentation Control Act of 1975, as amended (O.C.G.A 12-7-1), as well as the *Coastal Supplement to the Georgia Stormwater Management Manual (GSMM)*, to limit erosion and sedimentation impacts related to stormwater. Additionally, new stone would be added along the Station Tybee shoreline where rip-rap has deteriorated over time. This rip-rap repair along the shorelines of Station Tybee would stabilize the shoreline, helping to protect the waterfront and nearshore (including nearshore tidal bottom) areas against further erosion and deposition of sediment on the tidal water bottom habitat.

Overall, although some permanent loss of tidal water bottom is anticipated from the Proposed Action, the Action is believed to be consistent to the maximum extent practicable with the above-described enforceable policy as the repair of rip-rap along the shoreline will help to control erosion and deposition of sediment on the tidal water bottom.

Endangered Wildlife Act – O.C.G.A. 27-3-130

The Endangered Wildlife Act provides for identification, inventory, and protection of animal species within the State that are rare, unusual, or in danger of extinction. Potential species of concern within (or adjacent to) the project site were evaluated through use of the following resources:

- State of Georgia Natural, Archaeological, and Historic Resources Geographic Information System (GNAHRGIS) Ecology Review and Survey Module
- NPS Integrated Resource Management Applications (IRMA) Portal: NPSpecies, provided by the Georgia Department of Natural Resources
- National Oceanic and Atmospheric Administration (NOAA) Essential Fish Habitat (EFH) Mapper and Endangered Species Act (ESA) Section 7 Consultation
- In-Water Benthic & Coral Survey Report prepared by Dial Cordy & Associates and Natural Resources Studies Report, prepared by Arcadis for the U.S. Coast Guard

Species identified through desktop consultation and analysis efforts include several State protected birds, namely American oystercatcher, least tern, black skimmer, bald eagle, Wilson's plover, red knot, American swallow-tailed kite, piping plover, and wood stork. Additionally, Florida privet was indicated as a rare State plant of concern for the general project area, and nine (9) Federal and State listed aquatic species – North Atlantic right whale, West Indian manatee, loggerhead sea turtle, green sea turtle, leatherback sea turtle, hawksbill sea turtle, Kemp's ridley sea turtle, shortnose sturgeon, and Atlantic sturgeon – were also identified. During field survey efforts, no listed protected species or other species of concern were observed across the project site. Potential foraging habitat for protected birds was observed, particularly along the Station Compound shoreline and at Area B, and designated critical habitat for three (3) listed aquatic species (i.e. Atlantic sturgeon, loggerhead sea turtle, and North Atlantic right whale) was noted near to the project area.

It is not anticipated that the Proposed Action would have significant adverse effects on protected or special concern species, as none of the above-identified species were observed to be present during an in-water benthic survey and terrestrial field survey, and specific measures (e.g. application of best management practices (BMPs) and adherence to seasonal restrictions provided by State and/or Federal agencies) would be employed to limit impacts. Therefore, the Proposed Action is considered consistent to the maximum extent practicable with this enforceable policy.

Georgia Environmental Policy Act – O.C.G.A. 12-16-1

The Georgia Environmental Policy Act (GEPA) requires that an Environmental Impact Report be prepared as part of the decision-making and development process for all State agencies and activities. An EA is being prepared for the Proposed Action in accordance with the National Environmental Policy Act of 1969, as amended. Therefore, the Proposed Action is considered consistent to the maximum extent practicable with this enforceable policy.

Georgia Erosion and Sedimentation Act – O.C.G.A. 12-7-1

Applicable BMPs would be incorporated into the Proposed Action to prevent or minimize the erosion of soils exposed during construction and demolition activities and to maintain the quantity and quality of stormwater runoff discharged from the project areas. The areas of the on-shore facilities proposed for demolition would be replanted, or otherwise maintained in a permeable condition to facilitate the infiltration of precipitation and minimize stormwater runoff in the long term. Overall, the Proposed Action would not significantly increase the amount of impervious surface within the boundaries of Station Tybee, thereby having minimal effect on the corresponding volume of stormwater runoff generated at the Station. For these reasons, the Proposed Action is consistent to the maximum extent practicable with this enforceable policy.

One provision of the Erosion and Sedimentation Act prohibits land-disturbing activities within twenty-five (25) feet of the banks of any State waters, unless a variance is granted (O.C.G.A 12-7-6-(15)). As shown on the provided **Figure 2**, work proposed at the Station Compound and within Area B would occur within 25 feet of the Savannah River. Given the current footprint of the Station Compound/Area B, in conjunction with the nature of the work (e.g. repair and expansion of the existing NPS boat ramp), land disturbance along the Riverbank is necessary to complete the Proposed Action. As such, a variance for the Proposed Action would be obtained prior to the construction process, and the Action is considered consistent to the maximum extent practicable with this enforceable policy.

Georgia Water Quality Control Act – O.C.G.A. 12-5-20

The Georgia Water Quality Control Act makes it unlawful for any person to “dispose of sewage, industrial wastes, or other wastes, or to withdraw, divert, or impound any surface waters of the State without a permit.” To meet the intent of the Georgia Water Quality Control Act, any waste products or debris generated from the project would be properly characterized, containerized, stored, and disposed of at an approved, licensed facility. Additionally, the documentation developed for the project would include measures to prevent the spill of potentially hazardous materials (e.g. petroleum products) and to effectively address any accidental releases. No withdrawal, diversion, or impoundment of surface waters is anticipated to be required at this time, but a permit for such action would be obtained if required.

Applicable BMPs, such as erosion and sediment control measures, and construction stormwater management measures, would be implemented during the proposed construction and demolition activities to prevent degradation of water quality in the Savannah River by managing the quality and quantity of stormwater discharged from the Station. There would be no significant increase in impervious surfaces at Station Tybee under the Proposed Action and as such, no corresponding increase in the volume of stormwater generated at the Station. In the long term, the Station would continue to adhere to the requirements of its SPCC and Stormwater Pollution Prevention (SWPPP) plans to manage stormwater generated at the Station and prevent discharges of oil or other hazardous substances into the coastal waters. Through adherence to applicable BMPs and protective measures, the Proposed Action would not adversely affect water quality in the surrounding waters; therefore, the Proposed Action is consistent to the maximum extent practicable with this enforceable policy.

Historic Areas – O.C.G.A. 12-3-50

The Georgia Department of Natural Resources has the authority to promote and increase the knowledge/ understanding of the history of the State by adopting and executing general plans, methods, and policies for permanently preserving historic structures. Historic and cultural features within (or in the general vicinity of) the project site were identified through preparation of a Phase 1A-Level Cultural Resource Investigation,

which involved consultation of the following sources: NPS documentation of the project area; the Georgia State Historic Preservation Office (SHPO) archaeological site information at (GNAHRGIS); data available from the National Register of Historic Places; published historic maps and narratives; and results from other investigations completed for the current project, such as geotechnical borings. A reconnaissance field visit was also performed, during which aboveground conditions at the site and visible portions of historic features were described and documented with digital photography.

The above-described efforts resulted in identification/verification of the following historic and cultural resources: Fort Pulaski National Monument (encompasses full project area), WWII Naval Base Remains (located at west end of Cockspur Island near to Station Compound), Cockspur Lighthouse (located off eastern coast of Cockspur Island), and a number of potentially sensitive archeological sites (includes former building sites overlapping Area B and Area C, as well as offsite shipwrecks and naval features in relatively close proximity to the project location).

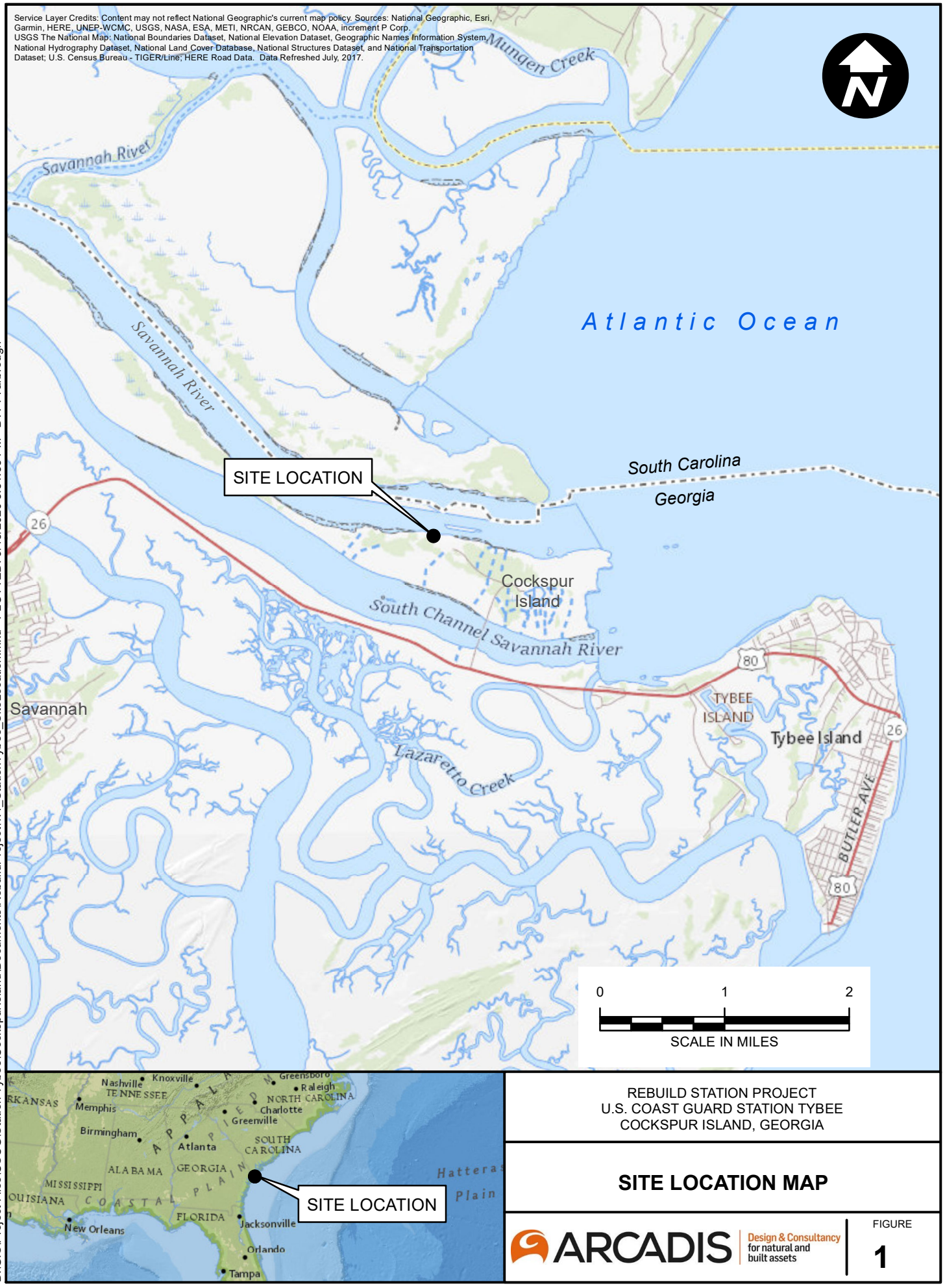
It is anticipated that the Proposed Action, and specifically the new Station Building, would have an adverse visual effect on the Fort Pulaski National Monument and, specifically, the Park Headquarters, as the new Station Building would be visible from the Park Headquarters building, which is a contributing element to the National Monument. To address these effects, mitigation would be included in a Memorandum of Agreement (MOA) that is to be signed by the USCG, NPS, and the GA State Historic Preservation Office (SHPO). Mitigation is anticipated to include architectural treatment of the building exterior, interpretive signage, and procedures for investigation and potential recovery of extant archaeological resources that may be encountered during construction. Therefore, the Proposed Action is consistent to the maximum extent practicable with this enforceable policy.

REQUIRED STATE, FEDERAL, AND LOCAL PERMITS

Permits are anticipated to be required from the U.S. Army Corps of Engineers (Clean Water Act Section 404 Permit – Individual), GADNR (Marshland Protection Permit, 25 Foot Vegetative Buffer Encroachment Variance, National Pollutant Discharge Elimination System (NPDES) Permit for construction activities over 1 acre in size, Clean Water Act Section 401 Water Quality Certification, and Revocable License).

CONCLUSION

As discussed in this document, the proposed improvements to USCG Station Tybee would have reasonable and foreseeable impacts on coastal resources and uses within/near to the project area. The proposed project will have localized, minor adverse impacts on coastal resources within the existing previously disturbed project area. However, it is expected that any adverse effects would be relatively minor in nature. Additionally, the Proposed Action may ultimately have localized, beneficial impacts to the coastal zone and coastal resources by eliminating the existing wastewater treatment system at USCG Station Tybee which is operating beyond its design capacity, and upgrading the existing NPS wastewater treatment system within Area A to treat wastewater generated by Station Tybee. In accordance with Section 307 (c)(1) of the Federal Coastal Zone Management Act of 1972, as amended, the USCG has determined that the proposed action is consistent to the maximum extent practicable with the enforceable policies of Georgia's approved coastal management program. This determination is based on the review of the proposed project's conformance with the enforceable policies of the State's coastal program.



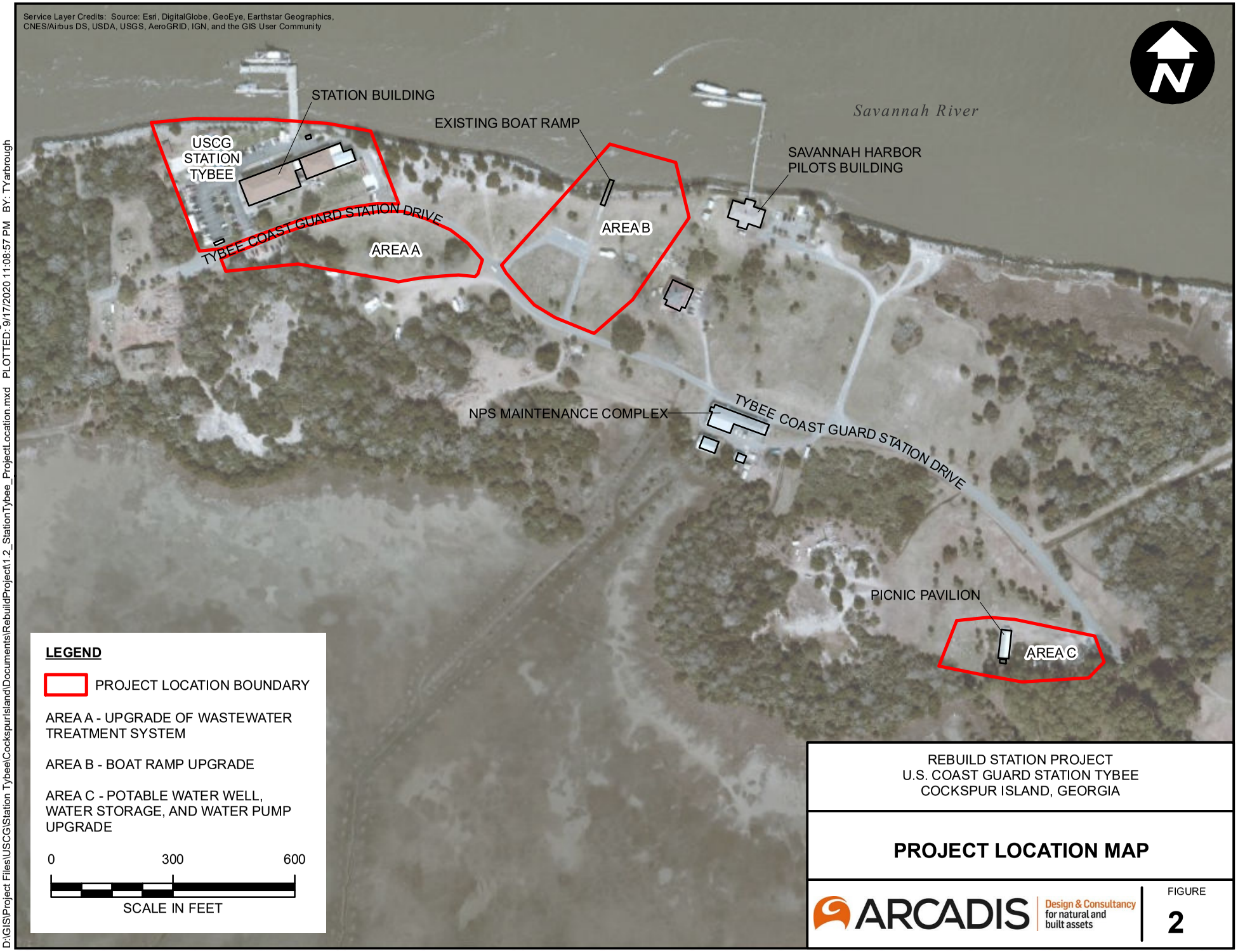
REBUILD STATION PROJECT
U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1

CITY: NOVI, MI DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: 30049571 COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
D:\GIS\Project Files\USCG\Station Tybee\CockspurIsland\Documents\RebuildProject\1.1_StationTybee_SiteLocation.mxd PLOTTED: 9/15/2020 3:51:35 PM BY: TYarbrough



CITY: Novi DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane Georgia East FIPS 1001 Feet
D:\GIS\Project Files\USCG\Station Tybee\CockspurIsland\Documents\RebuildProject\1.2_StationTybee_ProjectLocation.mxd PLOTTED: 9/17/2020 11:08:57 PM BY: TYarbrough

REBUILD STATION PROJECT
U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA

PROJECT LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 2

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTALGADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

December 7, 2020

Mr. Richard Hylton
Dept. of Homeland Security, USCG
rick.d.hylton@uscg.mil

RE: CZM Consistency Determination Concurrence: Replacement of USCG Station Tybee and Support Buildings with Multi-Mission Building on Cockspur Island, Chatham County
Ref: FDC20200094

Dear Mr. Hylton:

Staff of the Georgia Coastal Management Program (GCMP, the Program) has reviewed your October 7, 2020 letter and federal consistency determination proposing the replacement and improvement of the existing Station Tybee, as well as the improvement of three additional areas outside of the USCG Station Tybee within the Fort Pulaski National Monument of Cockspur Island in Chatham County.

The Program concurs that the planning and design of these activities are consistent to the maximum extent practicable with GCMP's enforceable policies. This design-build project, however, may require additional state or federal permits/permission for actual construction if there are impacts to tidally-influenced areas and/or water bottoms.

Please contact Ms. Deb Barreiro once project design progresses to the point you are ready to submit an application for impacts to tidal areas. Please feel free to contact Kelie Moore or me if we can be of further assistance.

Sincerely,

Doug Haymans
Director

DH/km

Cc: Deb Barreiro, GaDNR/CRD

APPENDIX D

Cultural Resources Overview

CULTURAL RESOURCES OVERVIEW / SECTION 106 CONSULTATION

United States Coast Guard Station Tybee Rebuild Station Project

Cockspur Island, Georgia

Contract Number 70Z05019DARCADI01

Task Order Number 70Z05020FSTATYB00

October 2020

Prepared for:

United States Coast Guard
Facilities Design & Construction Center
Norfolk, Virginia

Prepared by:

ARCADIS

PANAMERICAN CONSULTANTS, INC.
Experts in Cultural Resource Management

ENCLOSURE (1)

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1 Introduction

The United States Coast Guard (USCG) is proposing to recapitalize hurricane-damaged facilities at USCG Station Tybee by constructing a new Multi-Mission Station Facility (hereafter referred to as the Multi-Mission Building [MMB]) and demolishing existing onshore facilities, as well as repairing shoreline rip-rap, upgrading existing water supply and wastewater treatment systems, and upgrading the National Park Service (NPS) boat ramp (proposed undertaking). Construction of the new facility would replace multiple onshore buildings, including the Station Building, damaged during Hurricane Matthew at Station Tybee, which is located on Cockspur Island, Georgia. The Station is situated on land under the jurisdiction of the NPS within the bounds of Fort Pulaski National Monument Historic District. This document was prepared for the proposed undertaking pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) "Protection of Historic Properties" (Section 106), as amended.

The USCG is also preparing an Environmental Assessment (EA) to evaluate potential impacts associated with the proposed Undertaking pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] §4321 et seq,), the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and USCG Commandant Instruction (COMDTINST) 5090.1, U.S. Coast Guard Environmental Planning Policy; and National Park Service (NPS) Director's Order 12.

2 Project Background

Station Tybee (the Station), assigned to Sector Charleston, USCG District 7, is located north of Tybee Island, Georgia, and east of downtown Savannah, Georgia, in Chatham County. Figure 1 depicts the Site Location Map for Station Tybee. The Station occupies an approximate 3.1-acre parcel of land within Fort Pulaski National Monument. The Station suffered substantial damage during Hurricane Matthew in 2016. Prior to this event, it was already in need of major repairs and upgrades. The USCG plans to recapitalize and rebuild the Station to better meet its various missions with modern facilities that meet today's standards and harden its infrastructure for future resiliency. Figures 2 and 3 show the location of Station Tybee and Areas A, B, and C, the areas where the proposed undertaking and alternatives would occur and the undertaking's Area of Potential Effect (APE), which includes these areas and land adjacent to them. Station Tybee historically responds to approximately 250 Search and Rescue (SAR) cases per year. Station Tybee also hosts Aids to Navigation Team (ANT) Tybee and Coast Guard Cutter (CGC) POMPANO (WPB 87310) with different missions and areas of responsibility (AOR).

Station Tybee has one 45-foot Response Boat-Medium (RB-M) and three 29-foot Response Boat-Small (RBS) II. The RB-M is designed for multiple missions, including SAR, law enforcement, drug and migrant interdiction, and ports, waterways and coastal security. The RB-S II is a multi-mission platform, used for the full range of USCG missions, including: SAR, vessel boarding team deployment and law enforcement, port security, drug and migrant interdiction, and environmental response operations. The existing waterfront infrastructure includes the main pier, access pier, north floating dock for CGC POMPANO, and south floating dock for small boats.

ANT Tybee is located within Station Tybee at Fort Pulaski National Monument and is responsible for maintainng all federally owned buoys, day-boards, and other aids to navigation within its AOR. The ANT Tybee AOR extends along the full extent of coastal Georgia, the Savannah River, and its eastern Georgia tributaries. ANT Tybee has one 25-foot Trailerable Aids to Navigation Boat homeported at Station Tybee.

CGC POMPANO (formerly TARPON) missions include SAR, maritime law enforcement boardings of commercial and recreational vessels, and Port Security. Its AOR extends from the Georgia/South Carolina boarder southward to Key West, Florida. The 87-foot Patrol Boat (PB) is homeported at Station Tybee, and CGC POMPANO also operates one small cutter boat (with trailer on site).

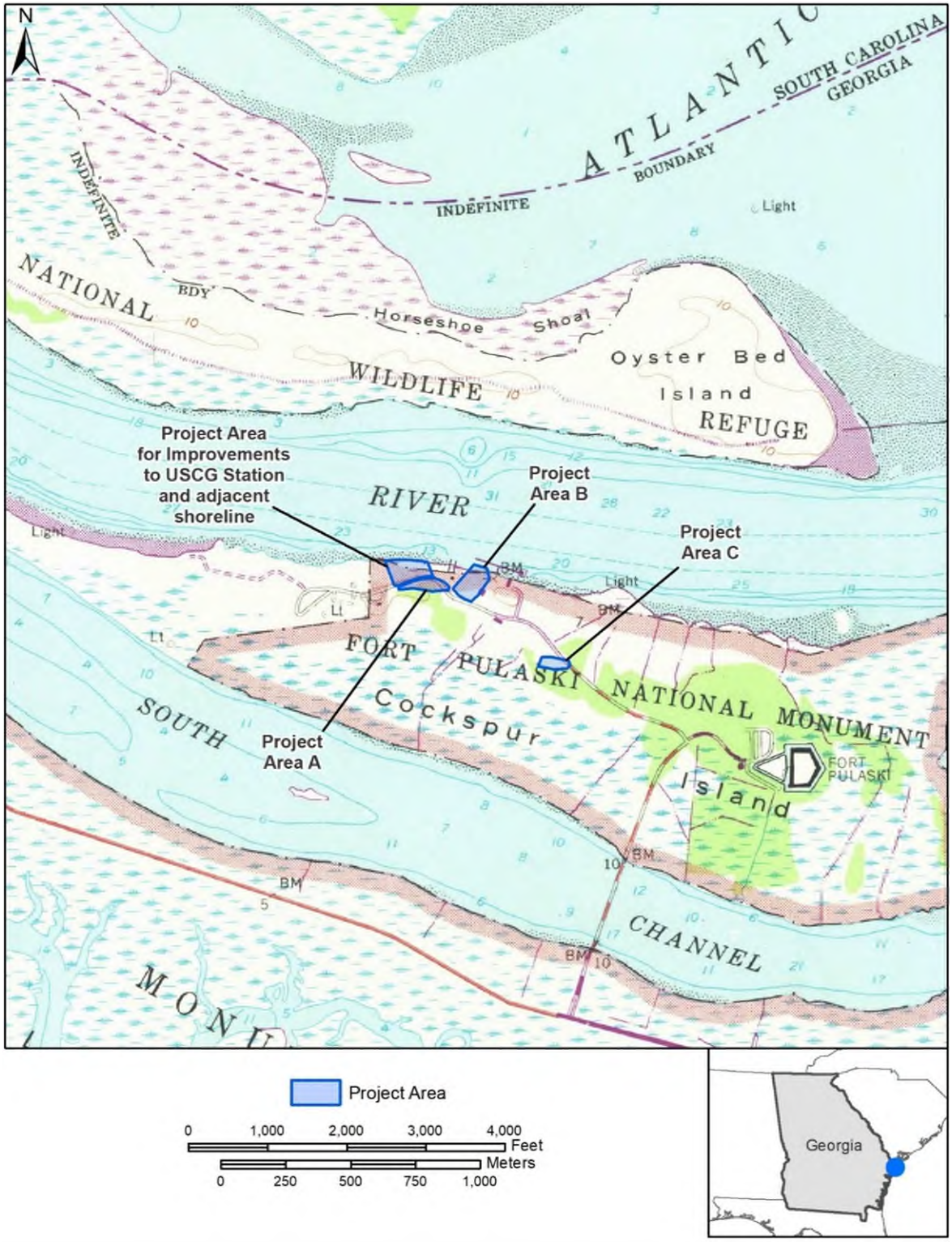


Figure 1. The location of USCG Station Tybee in the Fort Pulaski National Monument *(Base map: USGS 7.5-minute Fort Pulaski, SC-GA (1971[1955]) topographic quadrangle).*

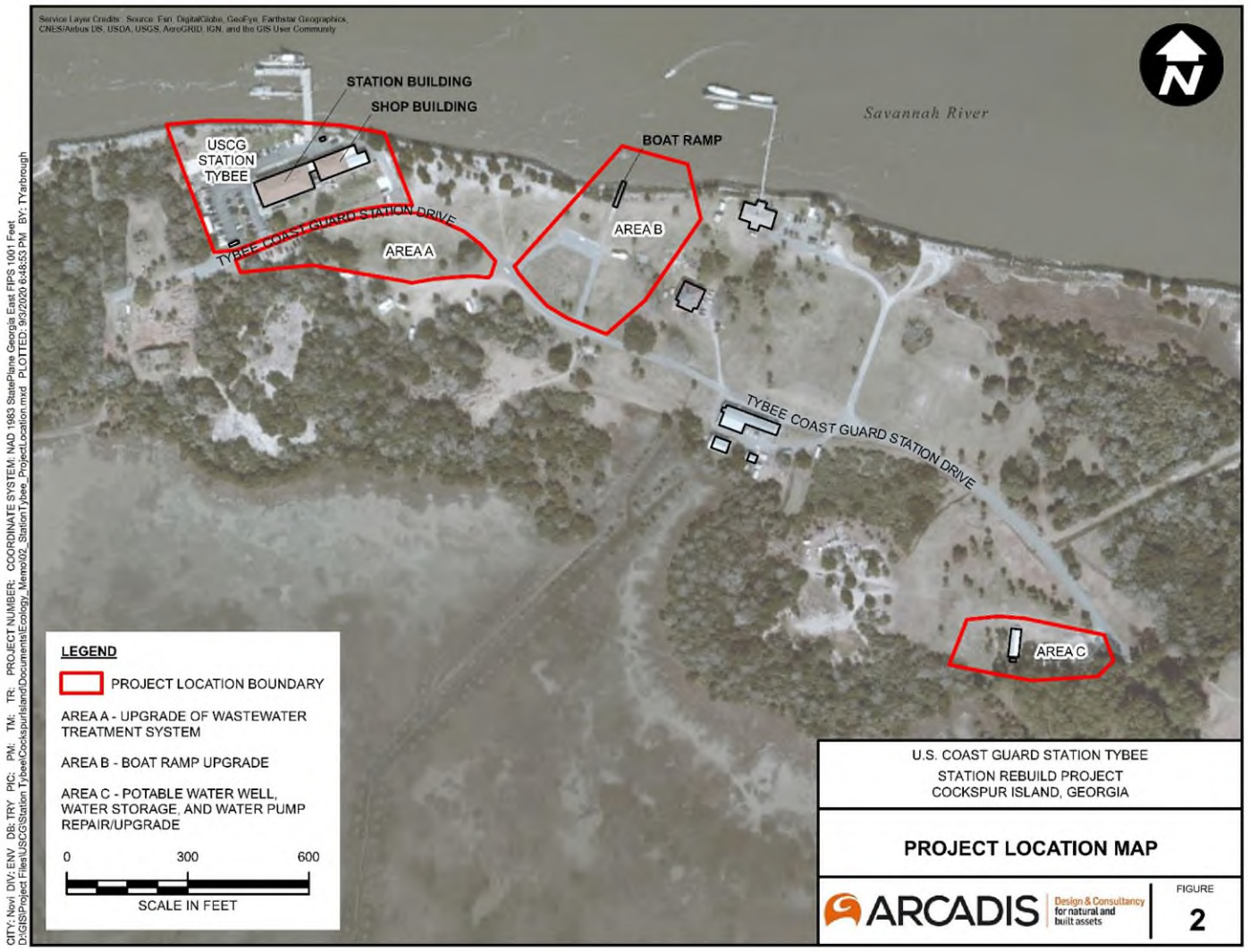


Figure 2. **Location of the project areas.**

Figure 3. Location of Area of Potential Effect and extant features shown on a recent aerial photograph view *(aerial photo source: ESRI 2020).*

Station Tybee, ANT Tybee, and CGC POMPANO currently operate out of a 23,936 gross square-foot (GSF) facility space, including two primary buildings (101 and 109) and numerous smaller support facilities (Table 1).

Table 1. Existing Shore Infrastructure

Facility Number	Facility Name	Year Built
101	Station Building	1983
102	Flammable Storage Building	1996
103	Recreation Pavilion	1993
109	Shops Building	1983
110	Hurricane Shed	1990
113	Grounds Maintenance Shed	1990
115	ANT Tybee Storage Building #2	2009
116	ANT Tybee Storage Building #1	2000
117	CGC POMPANO Storage Building	2000
121	Paint Locker	---
RO1	Open General Storage	

As stated on the 2019 DD 1391 form, the Station is currently operating at less than Full Operational Capability (FOC) due to the damages sustained during hurricane events and the current condition of the shore facilities and waterfront infrastructure. These structures have reached or exceeded their service life, which was exacerbated by storm damage and deterioriation. Damages to waterfront riprap/structures allow scouring to produce sinkholes and subsidence to station property which has to be continually repaired. Further, as most of Coskspur Island consists of dredge spoil, Station Building 101 has experienced settling, which has resulted in the use of numerous jacks to counteract the settling. Recent inspections (March 2019) have rated the structures as mostly in poor condition.

3 Alternatives Considered

As a result of the need to make Station Tybee fully operational, planning was undertaken to describe alternatives for addressing the issue. Various factors were considered in the evaluation of alternatives. These factors included cost, environmental impact, safety, readiness, security, resiliency, among others.

Potential alternatives available to the USCG were identified but, after further evaluation, several of these alternatives were found to be non-viable and, therefore, were no longer examined. The status quo (i.e., No Action Alternative) was also found to be non-viable but will be included in the future EA in compliance with NEPA regulations and to provide a basis against which alternatives can be compared. The alternatives found to be non-viable include the following:

- Rebuild on-site within expanded Station boundaries
- Relocate to existing space on another Federal installation

- Relocate to new construction on another Federal installation
- Relocate to new construction on a commercially owned site, and
- Relocate to new construction on US General Service Administration (GSA)-acquired property

Two alternatives were identified by the USCG as viable and will be evaluated in an EA, along with the non-viable No Action Alternative. The viable alternatives are:

- Rehabilitation Option 1: Rebuild on-site within existing Station Boundaries, and
- Rehabilitation Option 2: Rebuild on-site with use of NPS upgraded facilities

Each of the two viable alternatives include waterfront and shore infrastructure upgrades and/or replacements.

Rehabilitation Option 1 includes demolishing and replacing Station Building 101 (15,857 GSF), Buildings 102, 109, and other ancillary buildings (total 23,096 GSF). Construction of a total of 26,000 GSF Station building (replacing Buildings 101 and 109, as well as ANT Tybee Building and other buildings) would satisfy the full readiness needs for Station and ANT Tybee functions combined. The new Station Building would be a three-story building consisting of a high bay ground-supported boat bay at ground level with a mix of administrative and dormitory spaces on the second and third floors. The new Station would have a finished floor elevation of 16.2 feet, which is higher than the existing Station Building. The existing eroded rip-rap shoreline at Station Tybee would be repaired by placing additional stone in areas on both sides of the existing Station pier. A new boat ramp would be constructed adjacent to the existing USCG Station Tybee pier. During the construction period, temporary space for personnel would be provided in leased trailers on site. With this alternative, Station Tybee would continue to use the existing land parcel without repairing/upgrading any of the existing NPS facilities in Areas A, B, and C. The existing wastewater/septic treatment system at Station Tybee would be replaced, if feasible.

Rehabilitation Option 2 (the Preferred Alternative) includes demolishing and replacing Station Building 101 (15,857 GSF), Buildings 102, 109, and other ancillary buildings (total 23,096 GSF). Construction of a total of 26,000 GSF Station building (replacing Buildings 101 and 109, as well as ANT Tybee Building and other buildings) would satisfy the full readiness needs for Station, ANT Tybee, and CGC POMPANO functions at Station Tybee. The new Station Building would be reconstructed slightly to the west to free up space for circulation and parking for trailered boats and shop operations, and it would include associated pavement expansion and utilities extension. The existing eroded rip-rap shoreline at Station Tybee would be repaired by placing additional stone in areas on both sides of the existing Station pier. During the construction period, temporary space for personnel would be provided in leased trailers on site.

Alternative 2 would also include improvements completed beyond the Station Tybee compound. These improvements would include upgrading the existing NPS wastewater treatment system within Area A, upgrading the existing NPS potable water system within Area C, and expanding the NPS Boat Ramp within Area B.

Options for upgrading the existing NPS wastewater treatment system within Area A included Modification of the Existing System, Modification to a Mound System, Modification to a Community System, and Alternative Treatment Systems (PHE-Baker JV, LLC 2020). The USCG evaluation was based on the combined wastewater production of Station Tybee, two NPS buildings, a crewed patrol boat,

and a set of five trailer pads located south of Station Tybee. Modification of the Existing System would involve excavating and lining the trench bottoms of the existing absorption fields at Station Tybee and Area A with a new material to bring the infiltration rates down to required levels. Modification to the Mound System would involve supplementing or replacing entirely the existing mound within Area A with a Wisconsin Mound soil absorption system. Modification to a Community System would involve combining and centralizing four separate septic fields within a 500+-acre area that included Station Tybee to form a single, larger absorption field, to be located immediately south of the parking area near the NPS boat ramp. Alternative Treatment Systems comprise a packaged treatment system which could fit in an enclosure eight feet wide and 20 feet in length and would easily handle the daily treatment demands of the facilities as evaluated by the USCG.

Upgrading the Existing NPS Potable Water Supply System would include the construction of a new, elevated pumphouse at the NPS Picnic Pavilion. Further, casing for the existing water supply well would be extended to avoid high salinity flood water from entering the well and groundwater. To construct the new pumphouse, it is anticipated that geotextile fabric and a minimum of 6 inches of densely graded aggregate would be placed from the access off Tybee Coast Guard Station Drive to the location of the pumphouse. The aggregate may remain in place after construction to serve as a parking area.

Upgrading the NPS Boat Ramp would consist of removing the existing 8-foot wide concrete ramp and replacing it with a new 15-foot wide concrete ramp. The end of the new ramp would extend approximately 50 feet beyond the northern end of the current ramp. Two floating launching docks, each four feet wide, would be installed on either side of the concrete ramp. These docks would extend approximately 115 feet beyond the shore.

4 Description of Undertaking

The proposed undertaking proposes to reconstruct hurricane-damaged facilities at USCG Station Tybee by constructing a new MMB and demolishing existing onshore facilities, as well as repairing shoreline rip-rap, upgrading existing water supply and wastewater treatment systems, and upgrading the NPS boat ramp. The Proposed Action consists of the following components: 1) at the Station Tybee compound, construct and operate a new 26,000 GSF MMB, repair the stone rip-rap along the Station shoreline, complete site improvements (e.g., reconfigure parking areas and Station roads, upgrade utilities); 2) demolish existing facilities at Station Tybee that do not meet USCG resiliency requirements, and remove temporary office trailers; 3) upgrade/replace the existing NPS wastewater treatment system south of the Station (Area A); upgrade an existing NPS boat ramp to accommodate USCG vessels (Area B); and 4) upgrade the existing potable water supply groundwater well system, including construction of a new pumphouse (Area C). See Figures 2 and 3 for the locations of these areas.

5 Area of Potential Effect

The APE, as defined at 36 CFR 800.16(d), is “the geographic area or areas within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties, if such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The above-ground APE is inclusive of the limits of Station Tybee and portions of the adjacent Fort Pulaski National Monument Historic District to the east that is adjacent to the Park Headquarters Building (a former Quarantine Station Building) from which there are partial views of the USCG Station.

The archaeological APE is the limits of ground disturbance resulting from proposed construction activities. It is anticipated that the access and laydown areas will be contained within the limits of ground disturbance or to existing paved surfaces. APE areas measure as follows: Station improvements -- 3.1 acres; wastewater system repairs and upgrades (Project Area A) -- 1.6 acres; boat ramp repair and upgrade (Project Area B) -- 2.7 acres; and the water system upgrades (Project Area C) -- 1.1 acres (see Figures 2 and 3).

6 Identification of Historic Properties

To identify previously recorded historic properties in the APE, the USCG’s Secretary of the Interior-qualified consultants conducted a records search and reviewed readily available supplemental data provided by USCG, the NPS, historic maps and images, and information from other sources. Information on historic properties was collected via a desktop investigation as well as a reconnaissance field visit during which above-ground conditions at the project area and observable portions of historic features were noted and documented with digital photography. Materials reviewed include: NPS documentation of the study areas; the Georgia State Historic Preservation Office (SHPO) archaeological site information at Georgia’s Natural, Archaeological, and Historic Resources GIS (GNAHRGIS); published historic maps and narratives, and results from other investigations completed for the current project, such as geotechnical borings. Changes to the Savannah River shoreline around the study areas also informed the investigation

Previously Identified Archaeological Sites. No previously recorded prehistoric or Native American archaeological sites have been identified within the archaeological APE. The three building complexes and 13 buildings that have overlapped the project area (exclusive of the USCG Station compound itself) are designated as sites and subsites, respectively, in the NPS Archeological Site Management Information System (ASMIS). They are summarized in Table 2. In addition, ASMIS data provided by Fort Pulaski indicates an additional two former structures may have been present in the eastern part of Project Area B: both are unidentified quarantine station buildings. All the complexes, buildings, and structures in ASMIS are resources that are contributing, or potentially contributing, to the National Monument.

GNAHRGIS was also reviewed for information concerning archaeological sites (including shipwrecks) near Station Tybee. With the exception of Fort Pulaski National Monument (Georgia SHPO number 9CH674), the system shows no sites overlapping the archaeological APE. GNAHRGIS contains information for a total of eight sites within a mile of the APE (Table 3). They include: Fort Pulaski, a Civil War mortar platform south of the fort (9CH1162); the US Navy magazines west of the project area (9CH955); nineteenth-century spoils dump further to the west (9CH954); a wood plank feature on the

south shore of the Savannah River South Channel (9CH1431); and three Civil War-era shipwrecks in the Savannah northeast of the project area (9CH1486, 9CH1492, and 9CH1493).

Table 2. NPS Sites and Subsites overlapping the project area.

ASMIS ID	Name	Site / Subsite	Project Area
FOPU 00005.000	US Quarantine Station Complex	Site	B
FOPU 00005.001	Quarantine Officer's Residence (current Park Headquarters)	Subsite	B
FOPU 00005.00?	Unidentified Quarantine Station building	possible site	B
FOPU 00005.00?	Unidentified Quarantine Station building	possible site	B
FOPU 00010.000	West End Naval Complex	Site	all
FOPU 00010.010	Pilot's Quarters	Subsite	B
FOPU 00010.011	Officers' Mess	Subsite	B
FOPU 00010.022	Bachelor Officers' Quarters	Subsite	B
FOPU 00010.023	Additional Bachelor Officers' Quarters	Subsite	B
FOPU 00010.041	Water Pump House	Subsite	C
FOPU 00010.042	Water Tower	Subsite	C
FOPU 00010.043	Electric Repair Shop	Subsite	B
FOPU 00011.000	Savannah Bar Pilots Complex	Site	B

Table 3. Archaeological sites in GNAHRGIS within one mile of the project area.

GNAHRGIS ID	Other name	Approx. distance from project (ft)	General time period
9CH674	Fort Pulaski National Monument	3,250 (reported location in GNAHRGIS)	historic, 18th to 20th centuries
9CH954	Ballast / spoil dump	2,200	historic, late 19th century
9CH955	Naval magazines	400-1,500	historic, 20th century
9CH1431	MI-01	5,200	historic
9CH1162	Mortar platform, CI-01	4,250	historic, Civil War
9CH1486	AB Thompson (shipwreck)	3,500	historic, Civil War
9CH1492	Santa Clara (shipwreck)	3,200	historic, Civil War
9CH1493	Sebasticook (shipwreck)	3,500	historic, Civil War

Historic Structures. None of the buildings or structures within the existing Station Tybee are 50 years of age (see Table 1). Three above-ground historic properties older than 50 years are in proximity to the APE: the Park Headquarters Building (formerly Navy Commanding Officer's Residence and earlier Quarantine Attendants' quarters), built ca. 1912 (ASMIS FOPU 00005.001); the 1950s boat ramp in Areas B; and a well head in Area C, built 1943. The Park Headquarters Building is listed on the National Register of Historic Places (NRHP) as a contributing structure at Fort Pulaski National Monument (listed 1975). The NPS has determined that the well head structure is not eligible for listing to the NRHP due to a lack of

significance and integrity, and that the NPS Boat Ramp also is not eligible for listing to the NRHP due to lack of significance.

7 Assessment of Effects

Based on the current design for the proposed undertaking, the USCG in consultation with the NPS has determined the undertaking will have an adverse effect on the Fort Pulaski National Monument National Register District due to the increased height and scale of the new Station. The adverse effect will be mitigated by a Memorandum of Agreement.

Further, the USCG in consultation with the NPS has determined that ground-disturbing activities associated with the proposed undertakings shall only occur in areas previously disturbed or archeologically surveyed. However, cultural remains, including an 1830s ditch and embankment associated with the early phases of construction at Fort Pulaski and a possible Civil War-era causeway, may be present in proximity to Area C below many feet of fill in a previously disturbed area. To rule out the possibility of disturbing this feature, the USCG will provide for remote sensing in the area associated with the well and distribution system, and should intact subsurface features be present, the USCG will reroute any planned ground disturbance that would otherwise disturb them. In Area B, in proximity to the NPS Boat Ramp upgrade, all ground-disturbing activities associated with the undertaking will be monitored for potential cultural resources by an archeologist who meets the Secretary of the Interior's Standards.

8 Consulting Party Outreach

In accordance with 36 CFR Part 800.4(d)(1), the USCG is in the process of identifying parties that may be interested in reviewing and commenting on the proposed undertaking, the EA, and the future effects determination on historic properties from this undertaking. The USCG is currently consulting with Fort Pulaski National Monument regarding the undertaking.

By separate letter, the USCG will also invite the federally recognized tribes who may have an interest in the area according to consultation with the NPS and review of the US Department of Housing and Urban Development's (HUD) Tribal Directory Assessment Tool (TDAT) to participate in consultation. The following tribes are identified as having an interest in undertakings in Chatham County, Georgia:

- Alabama-Coushatta Tribe of Texas
- Alabama-Quassarte Tribal Town
- Catawba Indian Nation
- Coushatta Tribe of Louisiana
- Kialegee Tribal Town
- Miccosukee Tribe of Indians
- Muscogee (Creek) Nation
- Poarch Band of Creeks
- Seminole Nation of Oklahoma
- Seminole Tribe of Florida
- Thlopthlocco Tribal Town

9 Context

Cockspur Island

As noted, archeological studies conducted to date have not confirmed prehistoric occupation of Cockspur Island. When Spanish explorers traveled along the Georgia coast during the early 1500s, the Euchee tribe inhabited nearby Tybee Island. In January 1733, Gen. James Oglethorpe and six British ships sailed past Cockspur Island and established the settlement of Savannah farther west. On a later voyage three years later, Oglethorpe led a group of settlers that included Reverend John Wesley, the founder of the Methodist Movement, which stopped at Cockspur Island on its way up the Savannah River.

In 1758, William DeBrahm and Henry Yonge, joint surveyors-general for the Georgia colony, surveyed Cockspur Island following the purchase of 150 acres by Charleston planter Jonathan Bryan. At this time, 20 acres of land at the island's eastern end were reserved for public use (Hitchcock 2011:6).

During the French and Indian War (1754–1763), Fort George, comprising a wooden palisade with a blockhouse, was constructed on the east end of the island in response to colonial concerns about possible attacks by the Spanish on Savannah. While the fort offered some protection for Savannah, it also provided customs and quarantine enforcement support. By 1773, the fort was in ruins, although it was still garrisoned by one officer and three enlisted men. It was abandoned and dismantled by the Patriots by 1776 (Groh 2000a:50-52).

James Wright, the Royal Governor of Georgia, accompanied by several high-ranking British officials, took refuge on Cockspur Island at the outset of Revolutionary War. As a result, for a short time, the island served as the Loyalist capital of the Georgia colony until the British reoccupied Savannah in 1778. Thereafter, the island was once again abandoned (Lattimore 1954:2; Groh 2000a:53).

In 1794, the U.S. Congress passed legislation for the construction of coastal defenses in an effort to secure the new nation's borders. The resulting system of fortifications is referred to as the "First American System of Fortifications." As part of this new coastal defense system, a new fort was erected on Cockspur Island to protect Savannah. Fort Greene, named after Revolutionary War hero Nathanael Greene, was constructed between 1794 and 1795 near the site of Fort George. By 1800, Fort Greene supported 65 soldiers and officers and served largely as a quarantine station during its use. In 1804, a hurricane struck Cockspur Island, destroying Fort Greene and killing half of the soldiers stationed at the island (Hitchcock 2011:8; Lattimore 1954:3).

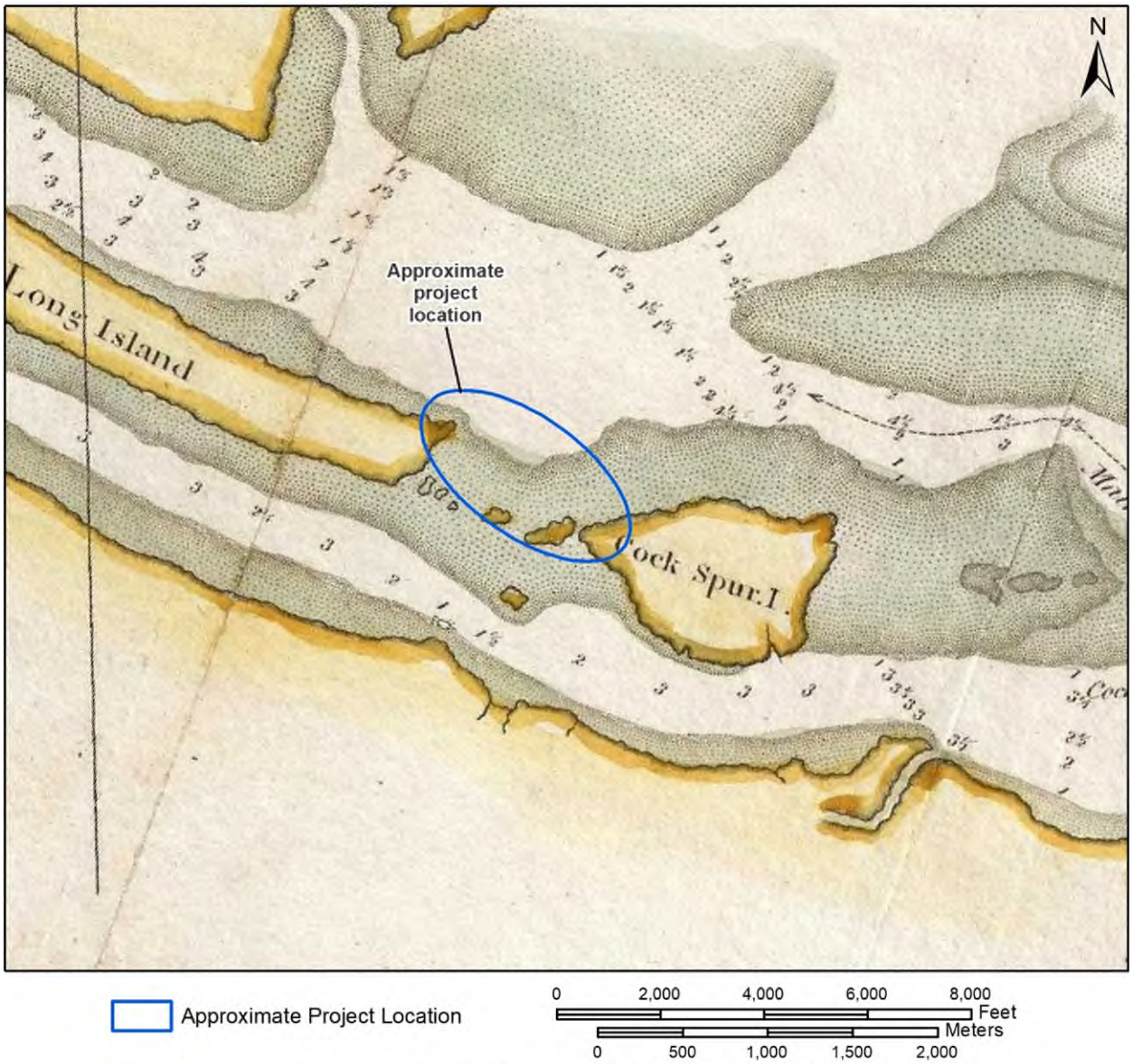
In 1807, fearing an attack by the British, Congress authorized the construction of the "Second American System of Fortifications." The new defense system would be more substantial, featuring high stone and masonry walls and multilevel tiers with internal casemates and gun positions. The second defense system was under development when the War of 1812 broke out (Meader and Binkley 2003:5-6).

Fort Pulaski. The invasion of Washington, D.C., by the British during the War of 1812, and the subsequent burning of the White House revealed the inadequacy of the United States' coastal defenses. As a result, Congress created the Board of Fortifications for Sea Coast Defense in 1816. Shortly thereafter, the federal government engaged French military engineer Gen. Simon Bernard. Bernard, along with U.S. Army engineers, designed a new coastal defense system, which became known as the "Third

System of Coastal Defense." A total of 42 forts were constructed or modified as a result of this effort, including one to defend the city of Savannah (Meader and Binkley 2003:6).

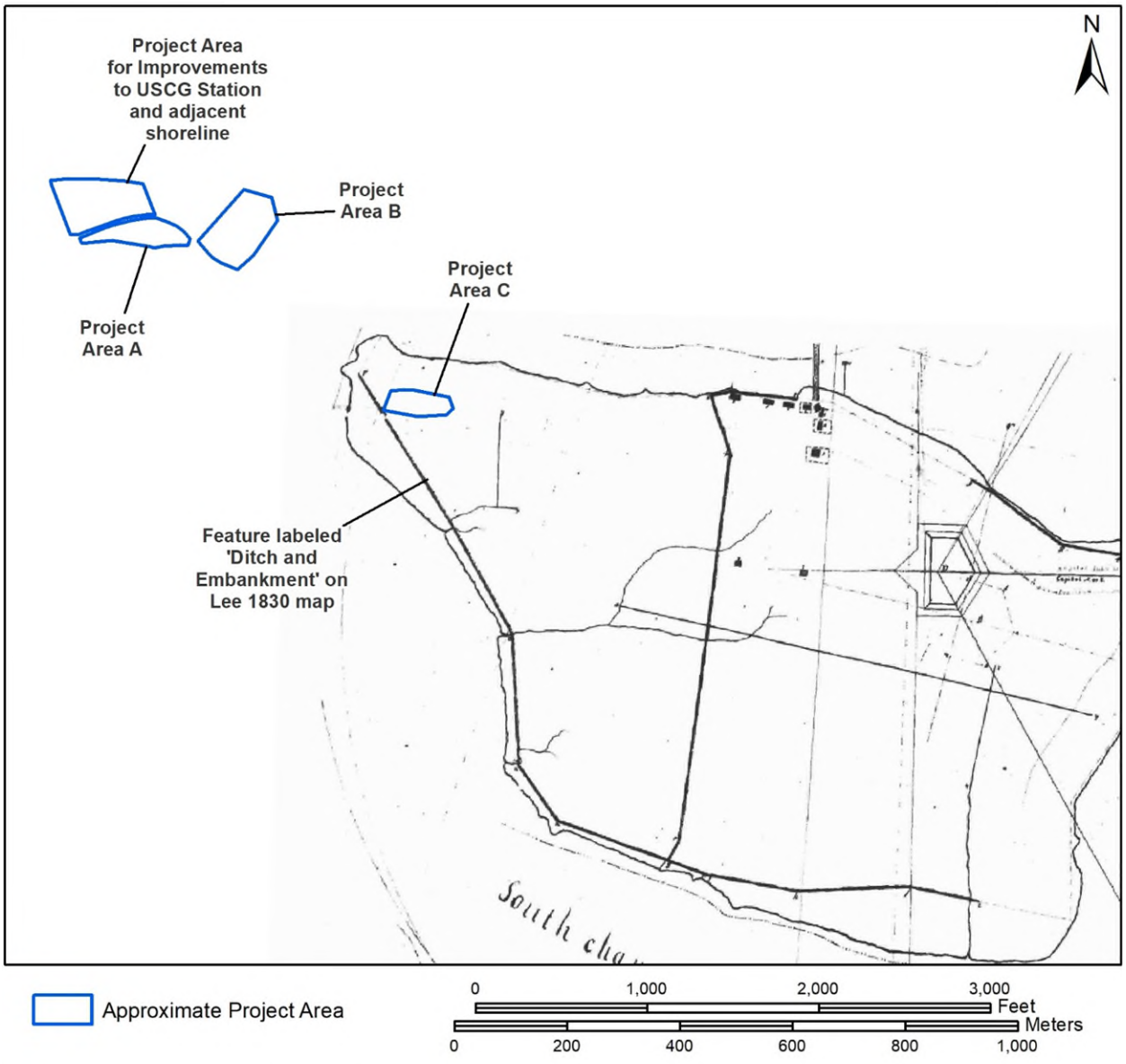
The Board approved the location of a fort on Cockspur Island in September 1828, and a topographical survey of the island commenced in December of that year under the direction of Maj. Samuel Babcock (Young 1936:42; Figure 4). In addition to constructing the fort, Babcock was charged with building a workmen's village, a dock, and a system of ditches and embankments (Meader and Binkley 2003:6). In 1829, Robert E. Lee, a recent graduate of the United States Military Academy, West Point, was assigned to serve as assistant engineer under Babcock, and he would oversee the completion of several tasks (Young 1941). During the planning and initial construction, the island remained largely in private hands as the United States did not formally acquire the island until 1830.

Lt. Joseph K.F. Mansfield took control of fort construction from Major Babcock in December 1830 and would oversee construction of the fort for the next 14 years (Young 1936:43). Lee continued work on the island under Lieutenant Mansfield until 1831, when Lee was reassigned (Figure 5).



John Le Conte, Savannah River from its Mouth to the City of Savannah, 1821.
Published by E. & G.W. Blunt, 1837.

Figure 4. The approximate location of the project areas in 1821.



Captain Joseph K.F. Mansfield, 1831 Survey map
(as reproduced in Hitchcock 2011:25)

Figure 5. The approximate location of the project areas in 1831.

The fort on Cockspur Island was named for Polish Count Casmir C. Pulaski in recognition of his role during the American Revolution. The fort was constructed using enslaved labor from nearby rice plantations, military servicemen, and skilled masons and carpenters, many of whom were recruited from northern states (Lattimore 1954:9).

Frequent storms and the inability of Congress to appropriate funds in a timely manner delayed construction of the fort. The five-sided masonry fort was deemed completed in March 1847, although work on the surrounding dike and drainage systems continued for another five years.

The Civil War, 1861–1865. During January 1861, the Georgia militia seized Fort Pulaski under orders from the governor, and the state officially seceded from the Union, becoming one of the founding states of the Confederate States of America (Lattimore 1954:12-13). In November 1861, Confederate General Robert E. Lee returned to Fort Pulaski and decided to concentrate his forces from surrounding islands to the mainland. As part of this strategy, an artillery battery at nearby Tybee Island was dismantled, and its heavy guns were moved to Fort Pulaski (Lattimore 1954:19).

Following the abandonment of Tybee Island by Confederate forces, Union troops occupied the island and established a permanent garrison by the end of 1861. The Union began an effort to blockade Savannah and Fort Pulaski by constructing additional batteries and severing the telegraph line between Savannah and Cockspur Island by the end of February 1862. However, instead of waiting out a long siege of the fort, Union Brig. Gen. Thomas Sherman decided to attack the fort (Gillmore 1988[1862]:23-24).

The defenders of Fort Pulaski believed that the fort's 7-1/2-foot-thick solid masonry walls could not be breached, as the marshes surrounding the fort made it impossible for ships to safely come within shooting range of it. They believed Tybee Island, 1 to 2-1/2 miles away, was too far from the fort for land batteries to be effective. At that time, smoothbore guns and mortars were not capable of breaching a heavy masonry wall at a distance beyond 700 yards (Gillmore 1988[1862]:25-28).

Under cover of darkness, Union forces under the direction of Brig. Gen. Quincy Adams Gillmore constructed gun batteries and mortars on Tybee Island facing the fort for use on the fort. The accuracy and effectiveness of the rifled guns used by the Union forces was not totally understood by the Confederate defenders of Fort Pulaski, but they would soon find out (Gillmore 1988[1862]:23-29; Lattimore 1954:28-29).

At 8:15 am on April 10, a 13-inch mortar shell was fired by Union forces from Battery Halleck on Tybee Island, beginning the bombardment. Most of the early shots fired by Union forces missed their mark, but the slow bombardment gradually inflicted significant damage as it continued through the day until nightfall. The bombardment began anew at dawn the next morning. Shortly after noon, following a barrage of Union fire, the southeast angle of the fort was in ruins, with two sizeable holes in it, making the inside of the fort visible from Tybee Island. At approximately 2:30 pm on April 11, the Confederate defenders surrendered. The fort was once again under Union control (Lattimore 1954:34).

Under the Union Army, repairs on the fort commenced, and weapons from the batteries on Tybee Island were relocated to Fort Pulaski. By June 1863, the fort's garrison was largely reduced to a holding force as fighting continued elsewhere (Lattimore 1954:37). During 1864, the fort served as a prison for captured Confederates.

On April 29, 1865, Union forces fired 200 guns from the ramparts of Fort Pulaski to celebrate the surrender of Gen. Robert E. Lee and the end of the Civil War.

Cockspur Island after the Civil War. Following the war, the US Army sought to modernize the fort after its failure in 1862. Beginning in 1869, the US Army Corps of Engineers under the direction of General Gillmore made a series of repair and improvements to the fort. However, it had become obvious to military planners that fixed masonry forts were vulnerable to the newer more powerful weapons and were becoming increasingly obsolete for modern warfare. In October 1873, the remaining Army units stationed at Fort Pulaski were withdrawn, and on October 25, the fort was officially closed. In 1875, the

Army acquired land on Tybee Island for a new fort – Fort Screven. During the 1880s, only an Army ordnance sergeant serving as a caretaker inhabited Fort Pulaski and two lighthouse keepers resided on Cockspur Island. The fort was set aside by the Army as a military reservation for potential future use.

In August 1881, a hurricane hit the Georgia coast, causing significant damage to structures on Cockspur Island. The workmen's village built in 1831 southeast of the fort was destroyed, as was the lighthouse keeper's house. However, the Cockspur Island Lighthouse (rebuilt in 1856), just off the southeast shore of the island, and the Tybee Knoll Cut Range Lighthouse (built in 1878-1879), off east end of what was Long Island southwest of the current Coast Guard station overlooking the South Channel of the river, survived (Meader and Binkley 2003:13). Following the storm, U.S. Army Corps of Engineers constructed a number of jetties at the mouth of the Savannah River to improve navigation. This construction led to the deposition of sand on the east side of the island.

On August 27, 1893, a major hurricane, referred to as the Sea Islands Hurricane, struck the Southeast coast. The storm brought 16-foot storm surges and killed more than 1,000 people in Georgia and South Carolina. On Cockspur Island, the rebuilt lighthouse keeper's house was again destroyed. After the 1893 hurricane, the lighthouse keepers resided inside casemates at the fort.

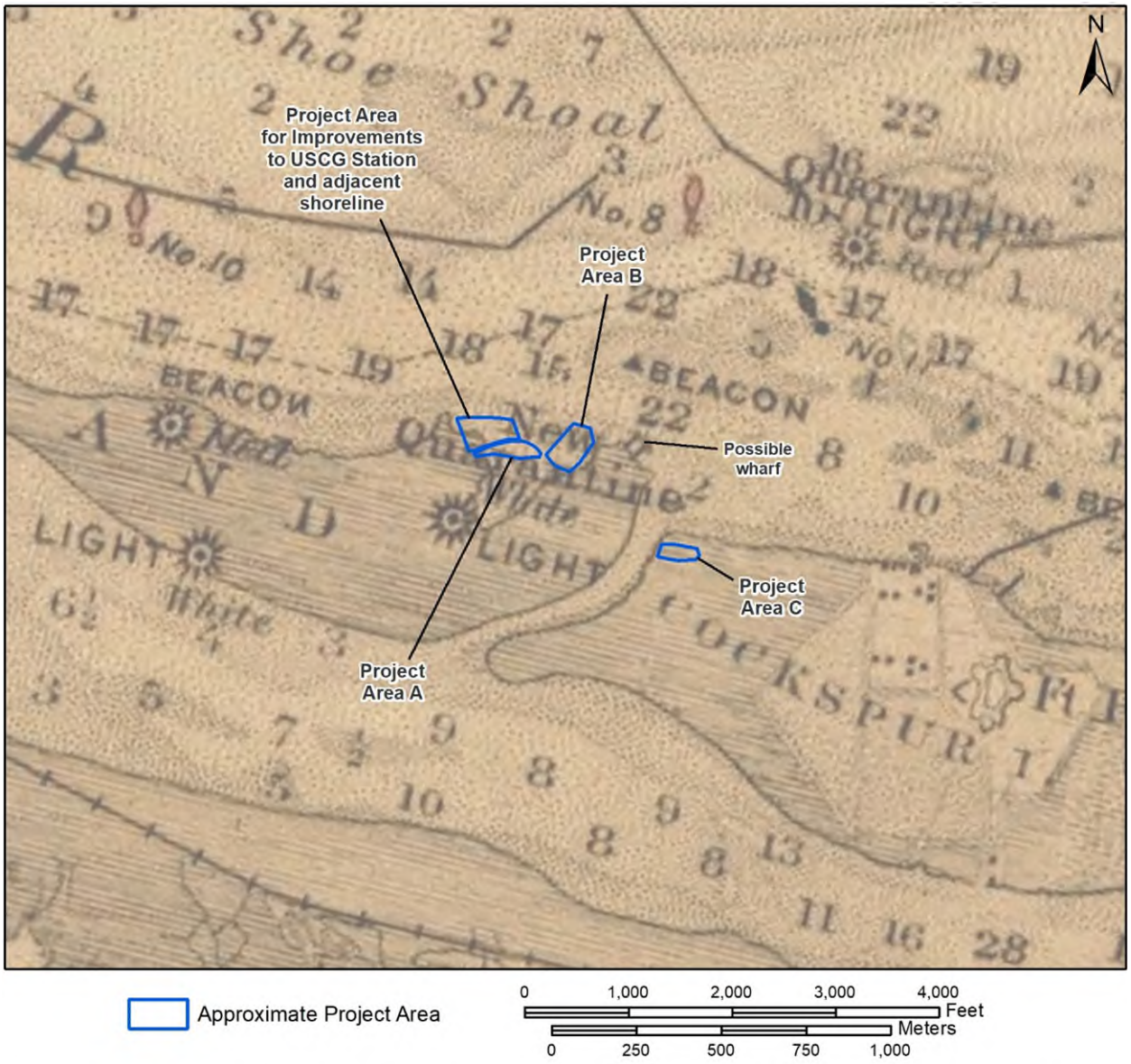
In the late 1890s, Congress appropriated funds to allow the War Department to bolster coastal defenses. Fort Pulaski remained strategically important as a result of its location along the Savannah River, and elements of the new coastal fortification system were placed on Cockspur Island, which included a structure to house controls for electric mines that were laid in the North Channel, and a battery for retractable guns (Battery Horace Hambright, completed in 1900). Neither addition saw combat, and Battery Hambright never received the weapons (Figure 6).

With the growing military obsolescence of Fort Pulaski at the end of the nineteenth century, the quarantine function once provided by Cockspur Island returned. The City of Savannah leased land from the War Department along the northwest shore of Cockspur Island in 1899 to establish a quarantine station. The station was administered by the U.S. Marine Hospital Service after its acquisition by the Treasury Department in 1899 (Hitchcock 2011:37; Jones 2004). The facility contained nine buildings by 1903, and included

> the hospital, laundry, pharmacist and attendants' quarters, kitchen building, medical officers' quarters, disinfecting house, paint house, sailors' quarters, and an attendant's quarters. Along the wharf, which was 312 feet long, and 10-17 feet wide, were a boathouse, engine room and sulfur storehouse. A massive water tank was constructed next to the decontamination building [Hitchcock 2011:32].

The station expanded over the next twenty years. By 1911, it covered 130 acres. By the 1920s, it supported about 20 buildings. The station was closed in 1937 (Jones 2004).

Also during the first decade of the twentieth century, the U.S. Lighthouse Service decommissioned both Tybee Knoll Cut Range Lighthouse and the Cockspur Island Lighthouse in 1909, although the tower of the latter remained to aid navigation (Hitchcock 2011:32).



United States Coast Survey Chart, From Savannah to Salepo Island, Georgia. Coast Chart No. 156, 1895.

Figure 6. The approximate location of the project areas in 1895.

Fort Pulaski National Monument. In October 1924, Fort Pulaski was designated a national monument in a proclamation by President Calvin Coolidge (Lattimore 1954:43). The fort was to be managed by the US War Department, which also maintained other Civil War sites such as Antietam, Gettysburg, and Shiloh national military parks. As a result, the fort remained in poor repair. In 1933, President Franklin D. Roosevelt transferred jurisdiction over all historic sites, battlefields, monuments, and parks previously administered by the War Department and other agencies to the National Park Service (Jones 2004:16).

During the 1930s, a series of New Deal public works projects directed under the Civil Works Administration, Public Works Administration, and the Civilian Conservation Corps (CCC) were completed on Cockspur Island at Fort Pulaski National Monument (Jones 2004:16; Hitchcock 2011:16-17). In 1934, CCC Camp 460 was established east of the quarantine station, initially consisting of four barracks. The CCC camp utilized unused buildings at the Quarantine Station for residences, but their work included tearing down some structures. The camp closed in 1941, and the program ended in 1942.

During the 1930s, the size of the National Monument increased through donations and acts of Congress, which increased the size of the National Monument to nearly 500 acres and extended the its western boundary to the eastern property line of the Quarantine Station (Meader and Binkley 2003) and included an additional 5,000 acres on adjacent McQueens Island. By the end of 1937, Department of the Interior had acquired the lands of the recently closed Quarantine Station. Between 1939 and 1943, the Army Corps of Engineers began improving the main shipping channel, which included removing "part of a point of land on which the quarantine station had been built … the old wharf was demolished, a new wharf constructed and two utility buildings and the old hospital were razed" (Jones 2004:17). The Corps also deposited this dredge spoil along the north shore of Cockspur Island (Meador and Binkley 2003:60).

U.S. Navy Base. Little more than one month before the bombing of Pearl Harbor in December 1941, the U.S. Navy received a permit to establish Section Base #20 at Cockspur Island. Later, in March 1942, the Department of the Interior turned the entirety of Cockspur Island to the Navy for the remainder of the war. The Navy set aside Fort Pulaski itself from use and restricted its usage to the former Quarantine Station and former CCC camp at the northwest side of the island (Figure 7). Over the next year the Navy spent as much as $2 million on improvements and new construction. The installation included barracks to house about 400 men, an administrative office, an air-conditioned movie auditorium, club rooms and cooking facilities, an officer's club, gymnasium, and an athletic field and tennis courts (Jones 2004: 17). The Navy decommissioned the base in September 1944. During the summer of 1945, the Navy turned the base over to the Coast Guard for use as a discharge station until June 1946 (Jones 2004:17; Hitchcock 2011:18). The NPS reacquired control of Fort Pulaski in August 1948, which initiated a program to remove the old wood-framed buildings utilized by former occupants. By 1956, only seven of the old main buildings remained. By 1969, only two or three of the old buildings remained (Jones 2004:180-19; Figure 8).

Also during this time, the Savannah Bar Pilots Association relocated their operations from near McQueens Island to the west end of Cockspur Island, occupying some of the old Quarantine Station buildings (Hitchcock 2011:36). In 1973, after much NPS resistance, a long-term permit was issued to the Savannah Bar Pilots to upgrade their buildings, dock, and fuel system (Meader and Binkley 2003:64).

USCG Station Tybee. The Coast Guard utilized the former Navy wharf on the north side of the island beginning in 1949 through a special use permit from the NPS. The Coast Guard attempted to expand its operations on Cockspur Island during the 1950s and 1960s but were rebuffed by the NPS until 1965 when it was allowed to establish a Search and Rescue Station. During the 1970s, the NPS permitted the USCG to erect a building and install communications equipment. In 1980, an agreement between the NPS and the USCG allowed the USCG jurisdiction over 1.85 acres for use as part of the Search and Rescue Station (Meader and Binkley 2003:61-61).

The existing waterfront infrastructure of STA Tybee includes a main pier, access pier, north floating dock for the Coast Guard Cutter Pompano (CGC POMPANO), and south floating dock for small boats. STA Tybee, Aids to Navigation Team (ANT) Tybee, and CGC POMPANO currently operate out of a total of 24,273 gross square feet (GSF) of facility space, including two primary buildings and numerous smaller support facilities. STA Building 101 houses the station's offices, galley and mess deck, training and conference space, duty berthing rooms, and other personnel support space. Building 109 houses STA Tybee shops, shop storage space, a fitness room, and other shop support spaces. Construction of a new ANT Tybee boat maintenance and storage building was completed in 2009.

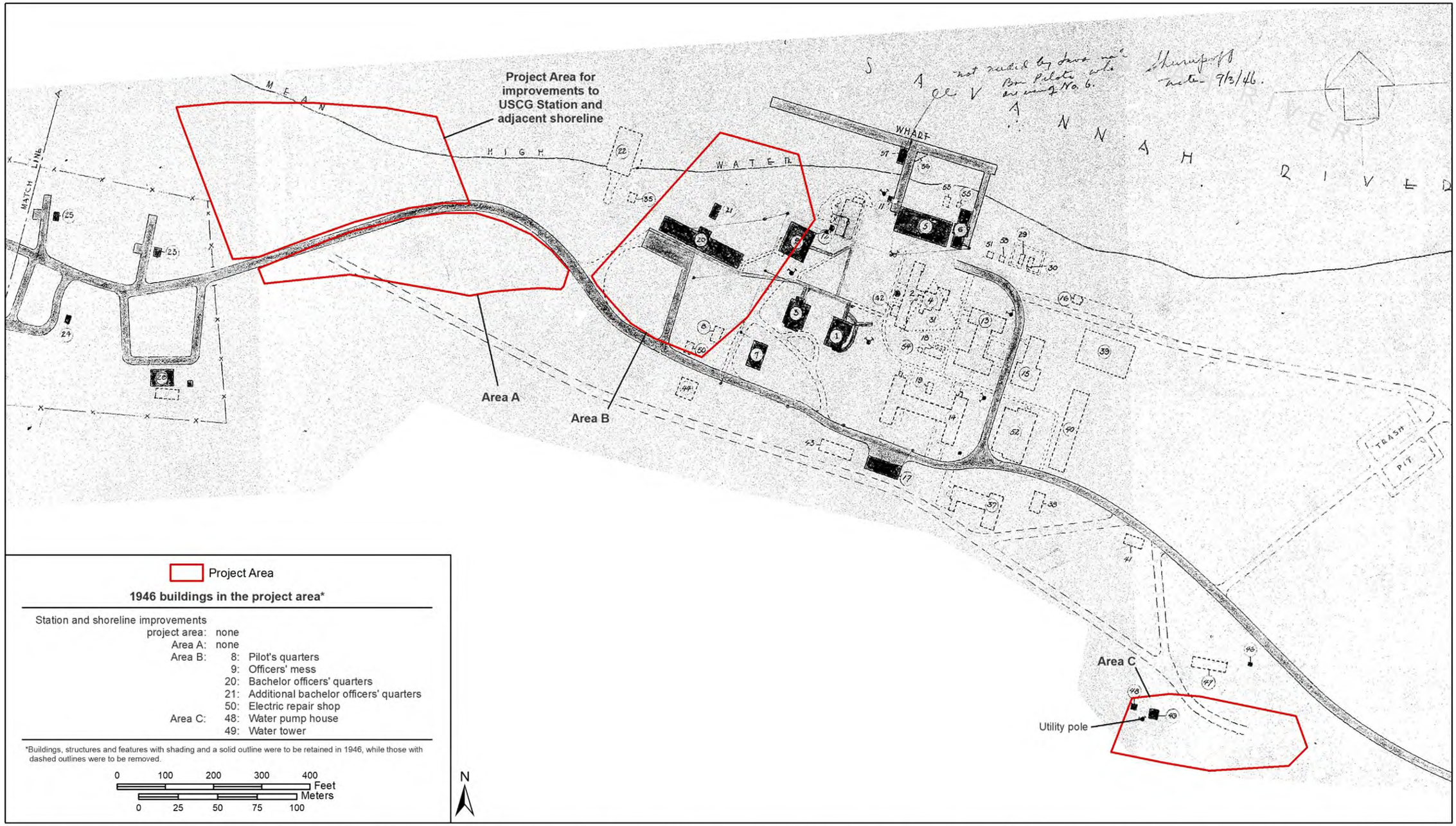


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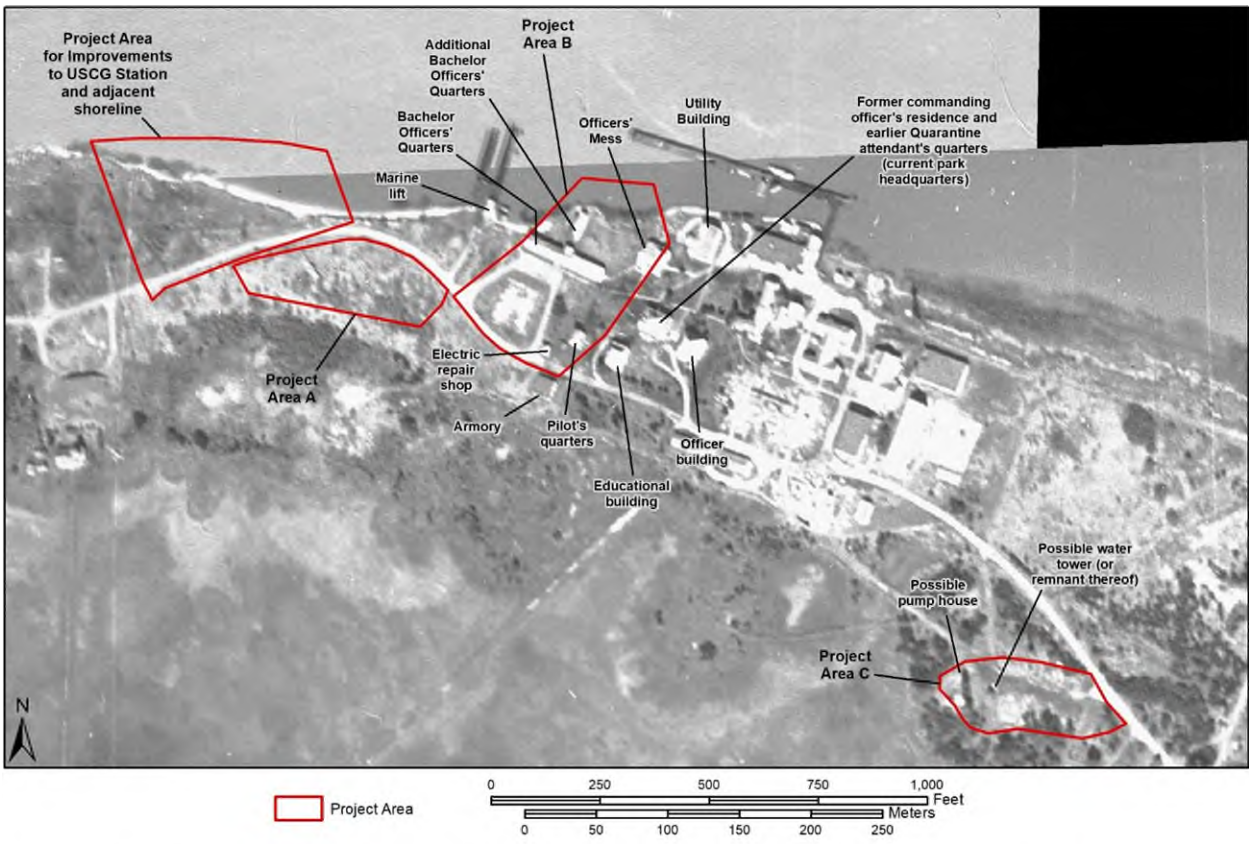
Figure 7. Buildings and structures in and near the project areas in 1946.



Aerial: 1952, Georgia Data Clearinghouse. https://data.georgiaspatial.org/data/local%20government/chatham/1952Chatham.zip

Figure 8. The project areas in 1952.

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APPENDIX E

Memorandum of Agreement

MEMORANDUM OF AGREEMENT

AMONG THE UNITED STATES COAST GUARD (USCG),

THE FORT PULASKI NATIONAL MONUMENT OF THE NATIONAL PARK SERVICE (NPS),

AND

THE GEORGIA STATE HISTORIC PRESERVATION OFFICER (SHPO)

REGARDING THE REPLACEMENT OF STATION TYBEE AT

U.S. COAST GUARD STATION TYBEE, COCKSPUR ISLAND,

CHATHAM COUNTY, GEORGIA

HP-200827-033

WHEREAS, the USCG plans to rebuild USCG Station Tybee located on the west end of Cockspur Island (undertaking) on lands owned by the NPS that are located within the boundaries of the National Register of Historic Places (NRHP)-listed Fort Pulaski National Monument (PARK); and

WHEREAS, the USCG will act as lead agency for this undertaking for the purposes of Section 106 compliance pursuant to 36 C.F.R. § 800.2(a)(2); and

WHEREAS, the undertaking will include the replacement of the Station Building and other supporting facilities and infrastructure with a new multi-mission facility, a new wastewater treatment system, upgrades to the potable water system, an upgraded boat ramp, and other associated infrastructure, including upgrades and modifications to the shared well and distribution system within the PARK which was originally installed in 1943, to support and enhance the various USCG missions assigned to this Station; and

WHEREAS, the USCG plans to carry out the undertaking utilizing federal FY2017, FY2018, and FY2021 appropriated funds. The undertaking, therefore, is subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. 306 § 108 et seq., and its implementing regulations, see 36 C.F.R. Part 800; and

WHEREAS, the USCG in consultation with the NPS and the SHPO has defined the undertaking's area of potential effect (APE) as the area identified in Appendix (1); and

WHEREAS, the USCG initiated consultation with the Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Poarch Band of Creeks, Catawba Indian Nation, Coushatta Tribe of Louisiana, Kialegee tribal Town, Miccosukee Tribe of Indians, Muscogee (Creek) Nation, Seminole Nation of Oklahoma, Seminole Tribe of Florida, and Thlopthlocco Tribal Town, and none of these eleven Tribes has indicated an intention or need to continue consultation under 36 C.F.R. §§ 800.2 (c)(i)(A) and (B); and

WHEREAS, in accordance with 36 C.F.R. Part 800.6(a)(4), the USCG invited the public to participate in a thirty-day project review and comment between January 6, 2021 and February 6, 2021. This invitation was published in both the Savannah Morning News and the Savannah Tribune on January 6, 2021, and included a project overview and information on how to access

both electronic and written copies of the draft Environmental Assessment Report that contained a project specific Cultural Resources Evaluation. The electronic version was available on a USCG website, and the written versions were available at the Tybee Library, the Islands Library, and the Fort Pulaski National Monument Visitor Contact Station. No public comments for consideration were received; and

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), the USCG has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination providing the specified documentation, and the ACHP has chosen not to participate in the consultation as stated in their letter dated January 28, 2021, pursuant to 36 C.F.R. § 800.6(a)(1)(iii);

NOW, THEREFORE, the USCG, the NPS, and the SHPO enter into this Memorandum of Agreement (Agreement) to ensure that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The USCG shall ensure that the following measures are carried out by a professional meeting the applicable Secretary of the Interior's Professional Qualifications Standards:

A. Interpretation

The USCG will provide for the research, development, and installation of three appropriate interpretative wayside markers on the PARK's public Lighthouse Overlook Trail, which provides views of the NRHP-listed Cockspur Island Lighthouse, now managed by the NPS, but formerly managed by the USCG and its predecessors. A site map of the trail is provided by Appendix (2). The interpretive waysides will provide a historical perspective of the USCG's rich history on Cockspur Island for the purpose of providing information and education of the general public visiting the PARK. The waysides shall meet NPS graphic identity standards. An example is provided by Appendix (3).

Draft wayside text and graphics will be submitted to the SHPO and the NPS for review and comment. Accepted wayside markers will be installed by the USCG within one (1) year of the final construction of the new USCG Station building and associated infrastructure. Photographs of the installed waysides will be submitted to the SHPO for the project file.

B. Archeological Monitoring and Remote Sensing

Prior to commencing any earth moving activities, the USCG will develop an Unanticipated Discovery Plan to cover all areas disturbed. The plan will be written by a qualified archeologist. Should a potential resource be encountered, Administration Condition III (Post Review Discoveries) of this agreement will be followed.

1. For clarity, the project's site plan has been divided into four distinct areas as follows:

Existing USCG Station Tybee Compound

a) Area A – Field located just east of the Station Tybee Compound
b) Area B – Existing Boat Ramp located east of Station Tybee Compound
c) Area C – Existing Well Area located to the southeast of Area A

2. Appendix (4) of this Agreement provides a general site plan illustrating these four areas. To minimize the potential to impact cultural resources in these areas, the following archeological monitoring and remote sensing will occur:

a) USCG Station Tybee Compound – This area is heavily developed and disturbed by previous construction of the existing Station. The existing Station is built on dredge spoils and previous archeological investigations indicate no cultural resources are likely. The Unanticipated Discovery Plan will be activated should a potential cultural resource be encountered.

b) Area A - An archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. To minimize potential effects, the USCG will provide gravel for all equipment staging areas located in this area as shown by Appendix (5).

c) Area B – An archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. The USCG will ensure that construction, heavy equipment, and staging equipment shown by Appendix (6) avoids the probable tennis court identified in the 2011 NPS Southeast Archeological Center (SEAC) report. If usage of that area becomes necessary, the USCG will provide matting to minimize impacts.

Area C - An archeologist will be on-site during all ground disturbing activities and will monitor for the discovery of any potential cultural resources. Appendix (7) is provided to clarify the expected construction footprint in this area. The Cultural Resources review undertaken by the USCG's Environmental Assessment contractor in 2020 indicated the potential presence of an 1830s ditch and embankment in this area. The NPS has indicated that the ditch is likely further east, but should remains be present, they are likely below many feet of fill in a previously disturbed

area. To fully rule out the possibility of disturbing this feature, the USCG will provide for remote sensing in the area associated with the well and distribution system. Should intact subsurface features be present, the USCG will relocate any planned ground disturbance that would otherwise disturb them. If ground disturbance below 5 feet is anticipated in Area C, the USCG will consult further with the NPS and the SHPO regarding effects to potential cultural resources prior to commencing activity below 5 feet in depth.

C. **New Construction**

The SHPO and the NPS shall be given the opportunity to review and comment on the design of the new Multi-mission building and associated infrastructure. Review and comment will occur at the 35% Structural and Site Design and 65% Structural and Site Design phases. The SHPO and the NPS will have 30 days to provide comments on the 35% design and 65% design, respectively. The USCG will review all comments and provide written responses to the SHPO and the NPS detailing how each comment is being incorporated or in the event the comment cannot be incorporated, the budget and mission constraints that drove that decision.

ADMINISTRATIVE CONDITIONS

I. AUTHORITY.

The Agreement is generally authorized under the provisions of Section 106 of the NHPA and its implementing regulations. In accordance with 14 U.S.C. § 141(b), the USCG is authorized to enter into this Agreement with the NPS and the SHPO.

II. DURATION

This Agreement will expire with the completion of the undertaking and its stipulations or if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, the USCG may consult with the other signatories to reconsider the terms of the Agreement and amend it in accordance with Administration Condition V (Amendments).

III. POST-REVIEW DISCOVERIES

If during construction previously unknown archeological resources are discovered, all work in the immediate vicinity of the discovery will be halted, signatories to the Agreement will be notified, and procedures of 36 C.F.R. § 800.13(c) followed. In the event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, the regulations implementing the Native American Graves Protection and Repatriation Act, 43 C.F.R. Part 10, as well as ACHP's

Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects will be followed.

IV. DISPUTE RESOLUTION

Should any signatory to this Agreement object to any actions proposed or the manner in which the terms of this Agreement are implemented, the USCG shall consult with such party to resolve the objection. If the USCG determines that such objection cannot be resolved, the USCG will:

a. Forward all documentation relevant to the dispute, including the USCG's proposed resolution, to the ACHP. The ACHP shall provide the USCG with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the USCG shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The USCG will then proceed according to its final decision.

b. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the USCG may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the USCG shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the Agreement and provide them and the ACHP with a copy of such written response.

c. The USCG's responsibilities to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

V. AMENDMENTS

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

VI. TERMINATION

If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Administrative Condition V (Amendments). If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other signatories.

Once the Agreement is terminated and prior to work continuing on the undertaking, the USCG must either (a) execute an Agreement pursuant to 36 C.F.R. § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. The USCG shall notify the signatories as to the course of action it will pursue.

VII. ANTI-DEFICIENCY

Nothing in this Agreement shall require or authorize any agency or employee of the Federal Government to make or authorize any expenditure or obligation of funds exceeding appropriated funding, to obligate any payment of money before it is appropriated, to indemnify any other party absent specific statutory authorization, or to violate the Anti-Deficiency Act, 31 U.S.C. §§ 1341(a)(1)(A) and 1341 (a)(1)(B).

VIII. OTHER PROVISIONS

Nothing in this Agreement is intended to conflict with current law or regulation or the directives of the Department of Homeland Security, the USCG, or any other party. If a term of this Agreement is inconsistent with such authority, then that term shall be invalid, but the remaining terms and conditions of this Agreement shall remain in full force and effect.

EXECUTION of this Agreement by the USCG, the NPS, and the SHPO, and its subsequent acceptance by the ACHP, and implementation of its terms evidence that the USCG has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

United States Coast Guard

Digitally signed by BARRESI.JOHN.F.JRII.1187016629
Date: 2021.03.15 11:47:10 -04'00'

_____ Date

J. F. Barresi
Captain, U.S. Coast Guard
Commanding Officer, Facilities Design and Construction Center

National Park Service

MELISSA MEMORY
Digitally signed by MELISSA MEMORY
Date: 2021.03.15 18:43:05 -04'00'

_____ Date

Melissa Memory, Superintendent
Fort Pulaski National Monument

Georgia State Historic Preservation Officer

Users, David C. Crass
Digitally signed by Users, David C. Crass
Date: 2021.03.23 10:30:33 -04'00'

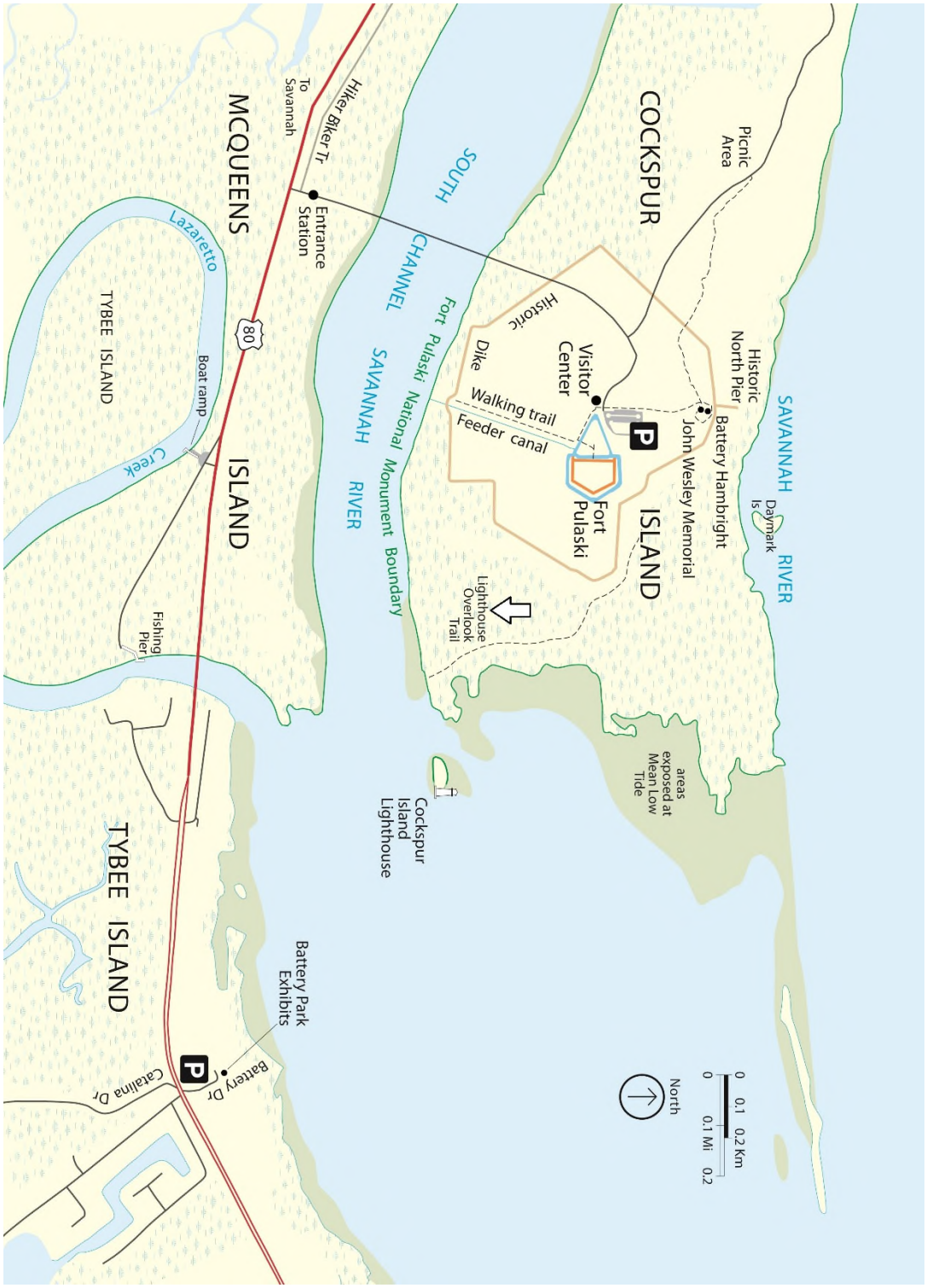
_____ Date

Dr. David Crass
Georgia Deputy State Historic Preservation Officer,
Division Director, Historic Preservation Division

APPENDIX (1) – AREA OF POTENTIAL EFFECT

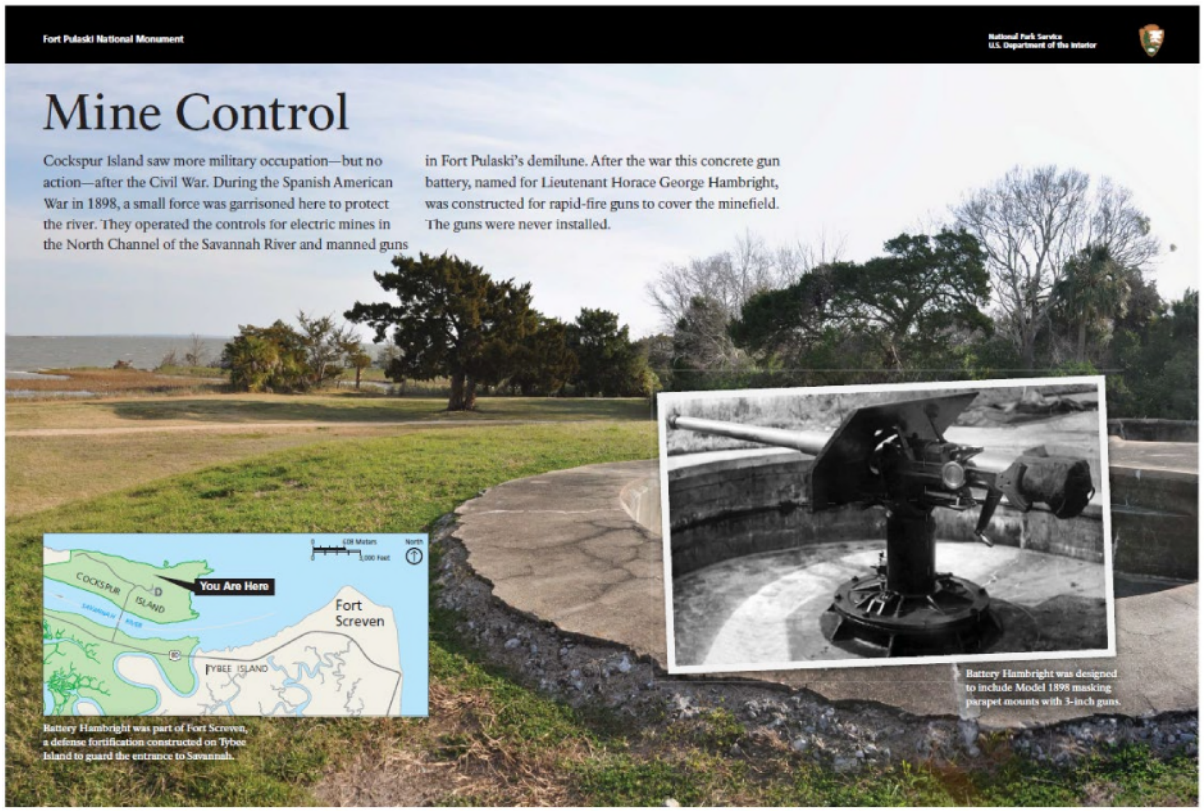
SITE MAP - AREA OF POTENTIAL EFFECT

APPENDIX (2) – LIGHTHOUSE OVERLOOK TRAIL SITE MAP



APPENDIX (2)

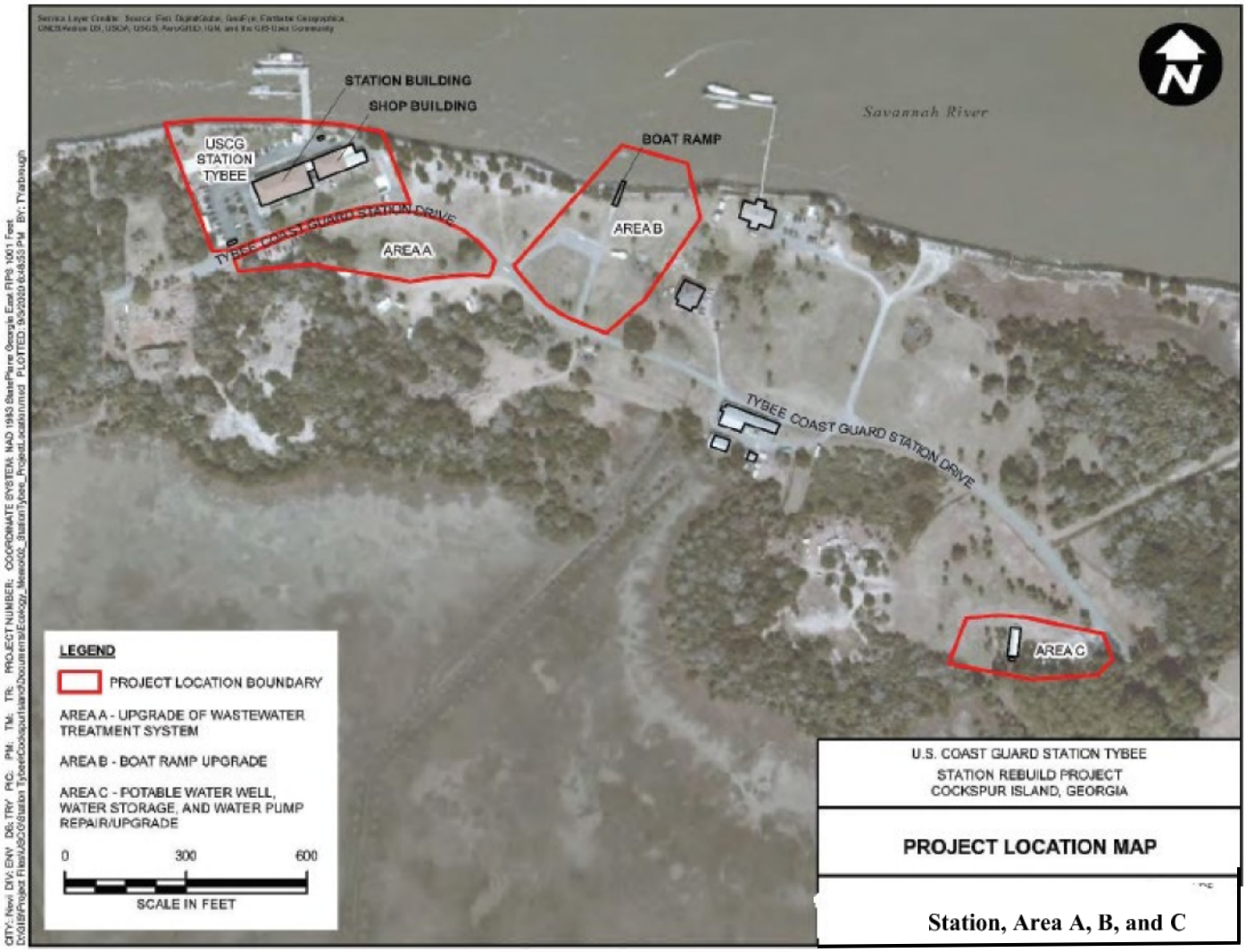
APPENDIX (3) – EXAMPLE WAYSIDE MARKER



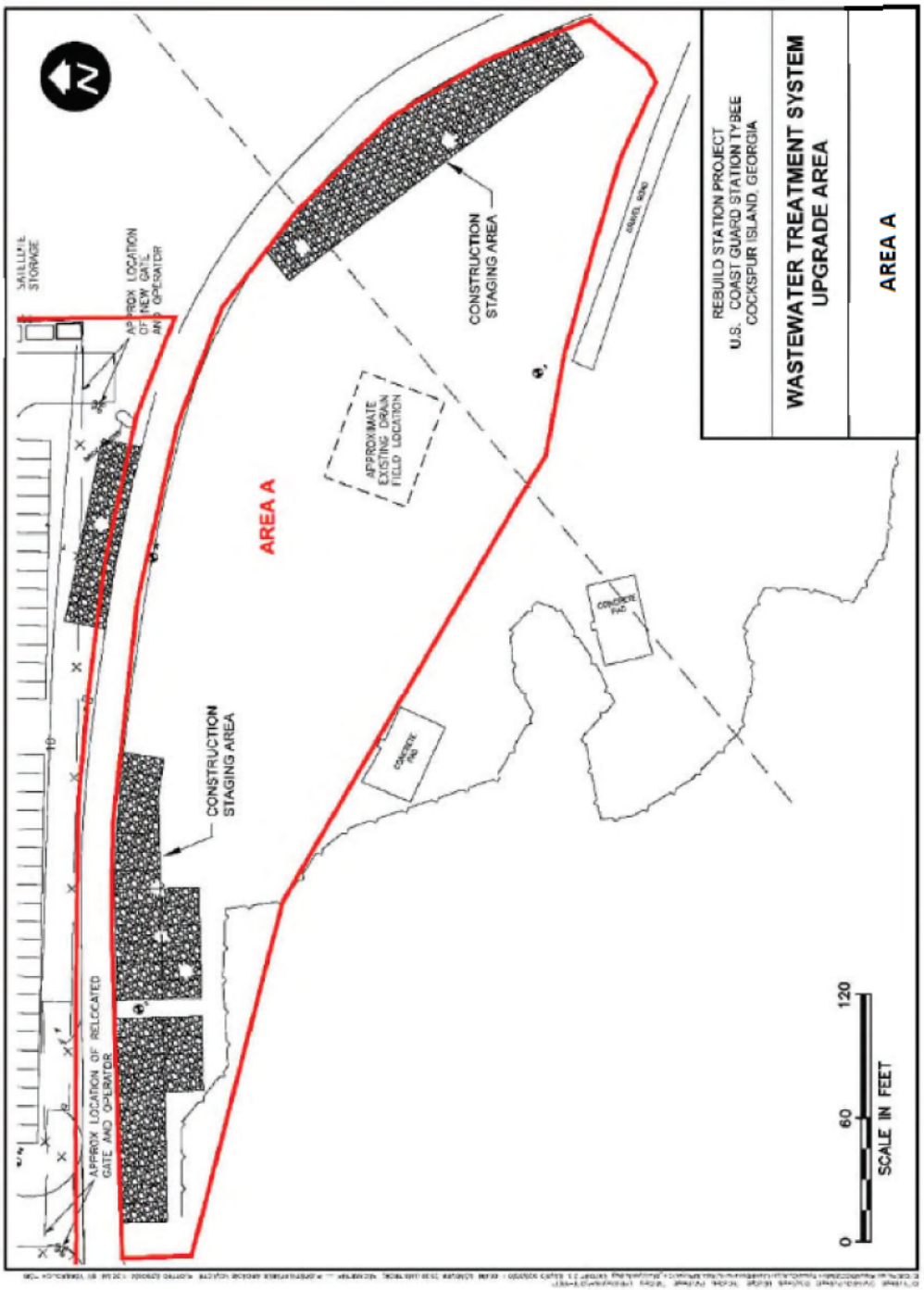
WAYSIDE MARKER EXAMPLE

WAYSIDE MARKER CONCEPTUAL SCALE AND DESIGN

APPENDIX (4) – GENERAL SITE MAP

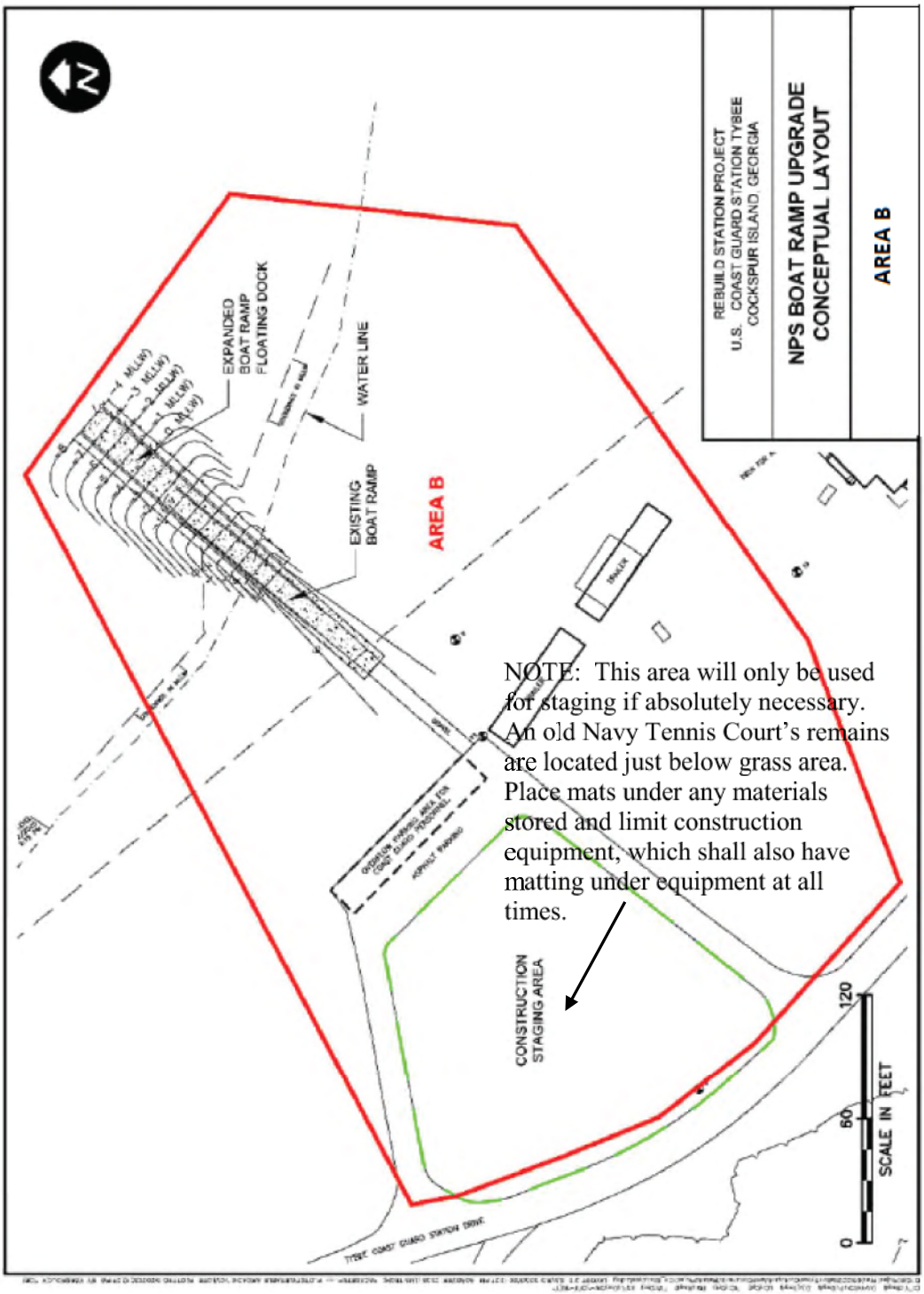


APPENDIX (5) – SITE MAP AREA A



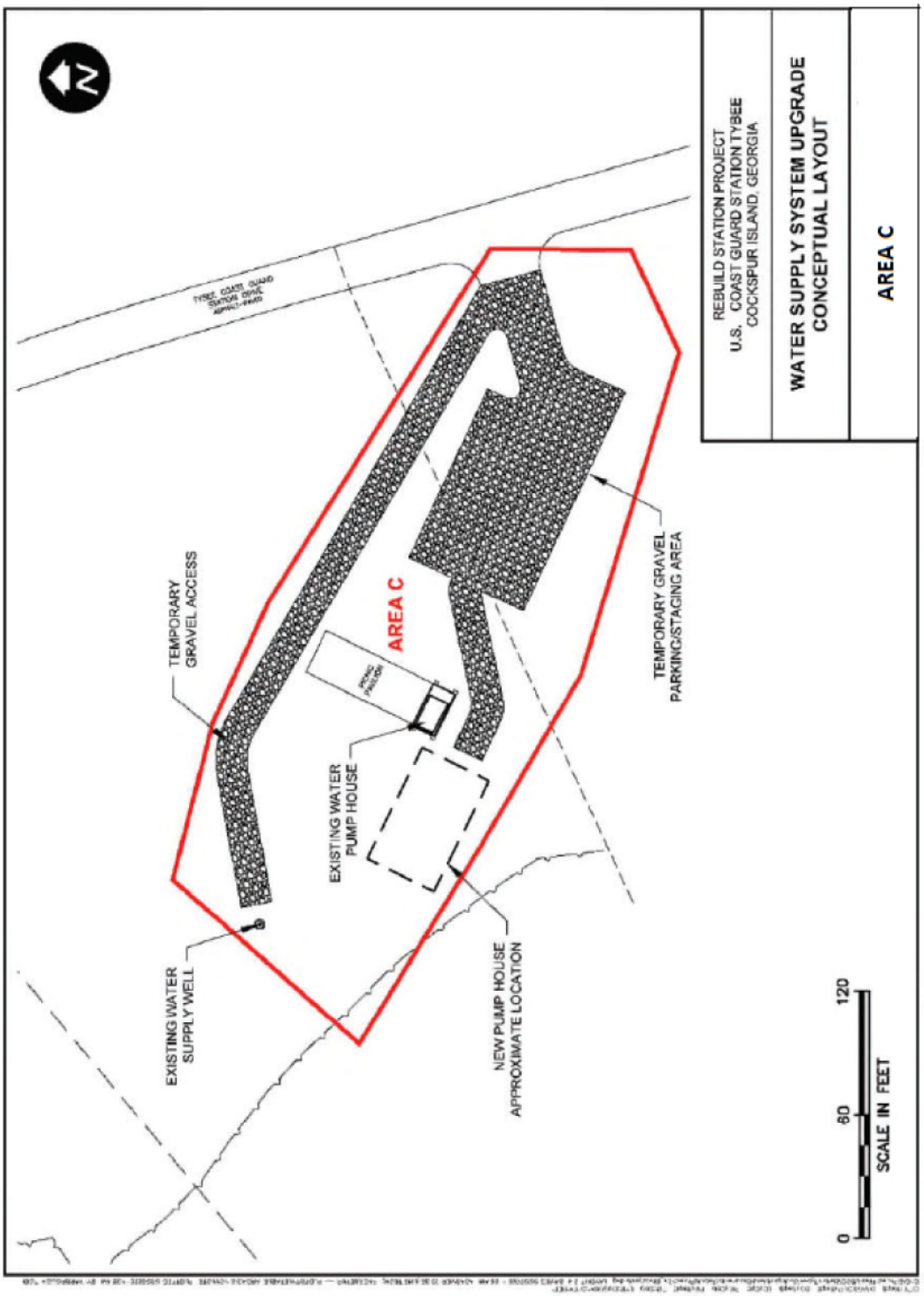
APPENDIX (5)

APPENDIX (6) – SITE MAP AREA B



APPENDIX (6)

APPENDIX (7) – SITE MAP AREA C


N
REBUILD STATION PROJECT
U.S. COAST GUARD STATION TYBEE
COCKSPUR ISLAND, GEORGIA
WATER SUPPLY SYSTEM UPGRADE
CONCEPTUAL LAYOUT
AREA C
TYBEE COAST GUARD STATION DRIVE ASPHALT-PAVED
TEMPORARY GRAVEL ACCESS
AREA C
TEMPORARY GRAVEL PARKING/STAGING AREA
EXISTING WATER PUMP HOUSE
EXISTING WATER SUPPLY WELL
NEW PUMP HOUSE APPROXIMATE LOCATION
0
60
120
SCALE IN FEET

APPENDIX (7)

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