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FINAL

ENVIRONMENTAL ASSESSMENT
Kodiak Waterfront Demolition
Projects
U.S. COAST GUARD BASE KODIAK, ALASKA



Submitted To: U.S. Coast Guard
CEU Juneau
709 West 9th Street, Rm 817
Juneau, AK 99801

Subject: ENVIRONMENTAL ASSESSMENT, KODIAK WATERFRONT DEMOLITION
PROJECTS, U.S. COAST GUARD BASE KODIAK, ALASKA

Shannon & Wilson prepared this Environmental Assessment and participated in this project as a sub-consultant to ECH Architecture PS. Our scope of services was authorized by the U.S. Coast Guard as identified in a notice to proceed issued by ECH on August 23, 2019. This report provides an assessment of the proposed project as required by the National Environmental Policy Act, and was prepared by the undersigned and authors identified in Section 7.

We appreciate the opportunity to be of service to you on this project. If you have questions concerning this report, or we may be of further service, please contact me at ajs@shanwil.com or (206) 695-6685.

Sincerely,

SHANNON & WILSON

Amy Summe, PWS
Associate, Senior Biologist/Permitting Specialist

AJS:KLW/ajs

**UNITED STATES COAST GUARD (COAST GUARD)
FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR
KODIAK WATERFRONT DEMOLITION PROJECTS, BASE KODIAK, ALASKA**

The Coast Guard proposes to demolish in-water facilities at two sites on Base Kodiak, Alaska:

- Marginal Wharf at the southwestern tip of the Nyman Peninsula in Inner Womens Bay, and
- A seawater intake structure and concrete pile cap near the northeastern end of the Nyman Peninsula in Inner Womens Bay.

Summary of the Results of the Environmental Impact Evaluation: No unmitigable significant impacts were identified for any of the alternatives in the EA. Best management practices would be included as standard provisions of Coast Guard contracts and conservation measures developed during the federal permitting and approval processes would be employed, including those resulting from the completed Endangered Species Act consultation. These best management practices and conservation measures are described in the attached EA.

Mitigation Commitments (Including Monitoring), if any, that will be Implemented to Reduce Otherwise Significant Impacts: The preferred alternative will result in the loss of Marginal Wharf, a contributing resource to the Kodiak Naval Operating Base National Historic Landmark and therefore listed in the National Register of Historic Places. Removal of the Marginal Wharf was determined an adverse effect and will be mitigated consistent with the memorandum of agreement currently under development with the National Park Service and the Alaska Office of History and Archaeology.

This FONSI is based on the attached contractor-prepared prepared environmental assessment (EA), which has been independently evaluated by the Coast Guard and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project and provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The Coast Guard takes full responsibility for the accuracy, scope, and content of the attached EA.

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

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6-3-21 Chris Rose Environmental Protection Level I Warrant
Environmental Reviewer Specialist

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

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6-3-21 Raven Smith Senior Environmental Level II
Senior Environmental Professional Professional Warrant

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

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6-4-21 Nathan L. Rumsey Commanding Officer
Proponent

**UNITED STATES COAST GUARD (COAST GUARD) FINAL
ENVIRONMENTAL ASSESSMENT FOR KODIAK WATERFRONT DEMOLITION
PROJECTS, BASE KODIAK, KODIAK ALASKA**

This Coast Guard [final environmental assessment FEA was prepared in accordance with Environmental Planning Policy, COMDTINST 5090.1 (series) and is in compliance with the National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321 to 4370h) and the Council on Environmental Quality Regulations dated 28 November 1978 (40 C.F.R. §§ 1500–1508).

This FEA 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 FEA concisely describes the proposed action, the need for the proposal, the alternatives, and the environmental impacts of the proposal and alternatives. This FEA 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 FEA preparation.

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Chris Rose
Environmental Reviewer

Environmental Protection Specialist
Title/Position

I reviewed FEA and submitted my written comments to the Proponent.

Level II
Warrant

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Raven J. Smith
Senior Environmental Professional

Environmental Protection Specialist
Title/Position

In reaching my decision/recommendation on the Coast Guard's proposed action, I considered the information contained in this FEA and considered and acknowledge the written comments submitted to me from the Environmental Reviewer(s).

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Nathan L Rumsey
Proponent

Commanding Officer
Title/Position

EXECUTIVE SUMMARY

INTRODUCTION

The U.S. Coast Guard (USCG) is proposing to demolish several in-water facilities at two sites on Base Kodiak, Alaska:

- Marginal Wharf at the southwestern tip of the Nyman Peninsula on Inner Womens Bay, and
- Seawater intake structures near the northeastern end of the Nyman Peninsula on Inner Womens Bay (collectively the Kodiak Waterfront Demolition Projects).

These existing facilities are derelict and obsolete, and present hazards to the natural environment, navigation, and public health and safety. None of the facilities satisfy current or future planned USCG mission requirements.

The USCG as the lead agency has prepared this environmental document pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 et seq.; NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] §1500 et seq.), and Department of Homeland Security Management Directive 5100.1 and USCG Commandant Instruction M16475.1D. The information and analysis contained in this Environmental Assessment (EA) will determine whether implementing the alternatives for the Kodiak Waterfront Demolition Projects would result in a significant impact on the environment, requiring the preparation of an environmental impact statement, or if no significant impacts would occur and a finding of no significant impact (FONSI) would be appropriate.

PURPOSE AND NEED FOR ACTION

Ongoing inspections during the past several decades of the proposed project areas have determined that the remaining structures are no longer functional due to their current state of severe degradation. As the structures deteriorate, contaminated debris and other structural materials accumulate on the substrate or are mobilized and dispersed to other areas of Inner Womens Bay or surrounding waters and shores. The purpose of the Proposed Action is to remove derelict in- and over-water structures from the Base Kodiak waterfront that present navigation hazards, contain hazardous materials, present other human health and safety concerns, and no longer support Base Kodiak's mission.

PROPOSED ACTION AND ALTERNATIVES

The Proposed Action is to demolish the Marginal Wharf and the seawater intake structures. The USCG has considered several alternatives during the past three decades to address the Marginal Wharf. However, to address navigation and safety concerns, and because neither structure can nor does support Base Kodiak's mission, this EA only analyzes the following two alternatives.

No Action Alternative

The CEQ's regulations implementing NEPA require inclusion of a No Action Alternative to serve as a baseline against which the impacts of the proposed action and any alternatives can be evaluated. Under the No Action Alternative, the existing facilities would continue to degrade without maintenance, posing risks to the environment, navigation, and human health and safety.

Proposed Action

Under the Proposed Action, the Marginal Wharf and remnant concrete structures that supported the old power plant's seawater intake would be removed.

Marginal Wharf. The remaining Marginal Wharf structure is approximately 1,700 feet long and 30 feet wide, with wider platform areas and shoreward projections that provided a connection to the shore at one time. The 12-inch-diameter creosote-treated piles are in varying states of decay and many are missing, likely laying on the bottom or washed out of the project area in tides or storms. A count of the piles indicates that there are approximately 1,236 piles that extend above the mean low water line and an assumed additional 203 piles that have broken off below the mean low water line. Many of the piles are hollow, with only the creosote-treated shell remaining. Six piles are collectively topped with a large concrete pile cap. The deck of the Marginal Wharf is also substantially degraded, with large sections missing and the remainder structurally unsound. The total area of semi-intact decking that remains is approximately 54,300 square feet. A variety of utility boxes, cleats, and conduit remain on the deck or are suspended from the deck. A small building with asbestos cement board siding has partially fallen through the deck.

This alternative would remove all the over-water and in-water structures, limited by the capabilities of the equipment and the condition of the structures, and would require disposal of wharf-related debris in suitable landfills approved for hazardous materials. All work would be conducted from barges or work boats and would follow the Best Management Practices (BMPs) for in-water work and pile removal.

Seawater Intake. The seawater intake is a concrete pier structure built-in 1941 to intake offshore saltwater for a World War II (WWII) electric power plant, and then decommissioned in 1981 when the USCG found an alternate power source. The pier was supported by concrete pile caps and steel H piles. Concrete decking was previously removed, and the pier foundations (pile caps and piles) and seawater intake structure at the end remain. The Proposed Action includes removal of the concrete intake structure and surrounding creosote-treated timber rub boards and the remaining concrete pile cap that is waterward of the high tide line (collectively the seawater intake structures). The removal of the deteriorated intake structures above the mudline will expose a void below the mudline that will be filled with approximately 6 cubic yards of crushed gravel. Piling, pile caps, and steel salt-water intake piping buried several feet below the mudline are not proposed to be demolished as part of this project.

SUMMARY OF POTENTIAL ENVIRONMENTAL CONSEQUENCES

A summary of the environmental impacts of each alternative is provided in Table ES-1. The action alternative assumes that BMPs included as standard provisions of USCG contracts and conservation measures developed during federal and state agency approval processes would be employed to avoid or minimize adverse effects on the environment. Use of BMPs and other standard conservation measures developed through technical assistance from the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries would ensure that the Proposed Action would avoid significant impacts or reduce potential impacts to less than significant levels

Exhibit ES-1: Summary of Environmental Effects by Alternative

Environmental Resource	No Action Alternative	Proposed Action
Air Quality	No impact.	Construction activities would have minor adverse impacts on air quality. These impacts would be localized, temporary, and short term. There would be no long-term impacts on air quality. Compliance with National Emission Standards for Hazardous Air Pollutants will minimize the risk of exposure to the public, including children, to asbestos.
Geology and Soils	Minor adverse impact resulting from continued contamination of soils and risks to human health and safety if a seismic event occurs that mobilizes piles and decking.	Construction activities would have minor adverse impacts due to disturbance of contaminated sediments during pile removal.
Water Resources and Water Quality	Minor adverse impact resulting from continued introduction of hazardous materials into the	Minor adverse impacts on local water quality during demolition resulting from pile removal and incidental disturbance of potentially contaminated sediments. Use of turbidity curtain and other BMPs during project activity

Environmental Resource	No Action Alternative	Proposed Action
	aquatic environment from degrading artificial structures.	will minimize the extent and magnitude of turbidity. Increased risk of fuel and oil spills from equipment used during demolition. Long-term beneficial impacts from eliminating contaminated materials from Inner Womens Bay.
Biological Resources	No direct impacts. Artificial structures would continue to introduce hazardous materials into the environment, potentially causing harm to flora and fauna.	<p>Application of conservation measures and appropriate shutdown zones developed consistent with guidance from USFWS and NOAA Fisheries resulted in agency concurrence with a may affect, not likely to adversely affect, determination for federally listed species potentially present in the action area. The projects will comply with all requirements of the completed Section 7 informal consultation.</p> <p>Use of an observer and compliance with appropriate shut-down zones during demolition activity would prevent impacts on marine mammals.</p> <p>The project sites are not mapped as essential fish habitat (EFH) for ground fish, but EFH is located within 1,000 feet for many species. The project sites are mapped as salmon EFH, but the removal of piles and other manmade structures will not degrade EFH in the long term. BMPs will minimize the extent and magnitude of turbidity.</p> <p>Pile removal associated with Marginal Wharf demolition would have minor adverse impacts on red king crab through removal of preferred habitat and possible mortality of any juvenile crab that are extracted with the pile.</p> <p>Surveying the project for migratory bird nests prior to construction, as determined necessary, would prevent impacts on migratory birds. Permanent loss of nesting habitat will occur, but the Marginal Wharf is already degraded and losing nest area as it breaks apart. Alternative nest locations are abundant.</p>
Land Use	No direct impact. Retention of derelict and obsolete structures would be contrary to land use plan recommendations.	No adverse impact. Demolition of obsolete and degraded structures is consistent with land use plans and will not affect any existing uses.
Hazardous Material and Human Health	Minor to significant adverse impacts as continued degradation of the Marginal Wharf may release hazardous materials and debris, including creosote, asphaltic tar, wood debris, metal debris, and asbestos, to Inner Womens Bay and further contaminate surface sediment or the intertidal area.	<p>Short-term adverse impacts if contaminated sediments are re-suspended during pile removal. Long-term beneficial effects from permanent removal of contaminated piles, decking and other building materials.</p> <p>Pre-demolition surveys for unexploded ordnance, and compliance with safety measures if found, would reduce potential health and safety risks to a less than significant level.</p>

Environmental Resource	No Action Alternative	Proposed Action
		Compliance with National Emission Standards for Hazardous Air Pollutants will minimize the risk of exposure to the public, including children, to asbestos.
Noise	No impact.	Minimal adverse noise impacts during demolition of Marginal Wharf or the seawater intake structures due to the absence of sensitive receptors nearby (Marginal Wharf) and the attenuation of noise to ambient levels within a short distance of the activity (seawater intake).
Transportation	Minor adverse impact. The existing derelict structures pose a continuing hazard to boat navigation if they remain.	Short-term adverse impacts during construction if barges and other work boats interfere with marine traffic. Long-term beneficial impacts from removal of navigation hazards from Inner Womens Bay.
Infrastructure, Utilities, and Services	Minor adverse impact. Retention of derelict structures would maintain a navigation and safety hazard that may subsequently require emergency services.	The proposed demolished structures are no longer viable infrastructure and have no operational utilities. During proposed demolition activities, there could be some need for emergency services in the event of an accident or spill. However, after the completion of demolition and materials removal, there would no longer be any infrastructure that could pose a safety threat or hazard.
Visual Resources	Minor to no adverse impact. The condition of the derelict structures would continue to degrade. Given the lack of nearby sensitive viewpoints and the industrial character of the Base Kodiak waterfront, this would not be a substantial visual change.	Minimal adverse effects during demolition from presence of barges and work boats; however, these are common in the bay in this working waterfront area. In the long-term, removal of degraded structures will have no adverse or minor beneficial effects on the visual setting.
Cultural and Historic Resources	Potential adverse effect on a historic property under the terms of the NHPA due to continued deterioration of the structure.	The Proposed Action will result in the loss of Marginal Wharf, a contributing resource to the Kodiak Naval Operating Base (NOB) National Historic Landmark and therefore listed in the National Register of Historic Places (NRHP). Removal of the Marginal Wharf was determined an adverse effect on the NHL. Because the Coast Guard is mitigating for the adverse effect and the overall diminishment of the NHL is low due to the poor historic integrity of the wharf, the overall effect on cultural resources is not considered significant. The seawater intake structures were determined ineligible for the NRHP.

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ACRONYMS

ACM	asbestos-containing materials
ACMP	Alaska Coastal Management Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AHRS	Alaska Heritage Resources Survey
APE	area of potential effects
BA	biological assessment
BMPs	Best Management Practices
BSU	Base Support Unit
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CZMA	Coastal Zone Management Act
DPS	distinct population segment
EA	Environmental Assessment
EEZ	Exclusive Economic Zone
EFH	essential fish habitat
EMP	Environmental Management Plan
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FMP	fisheries management plan
FONSI	finding of no significant impact
GOA	Gulf of Alaska
HWMU	Hazardous Waste Management Unit
KAP	Kodiak Area Plan for State Lands
MBTA	Migratory Bird Treaty Act
MEC	munitions and explosives of concern
MHHW	mean higher high water
MOU	Memorandum of Understanding
NAVD88	North American Vertical Datum of 1988
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NOAA Fisheries	National Marine Fisheries Service
NOB	Naval Operating Base

ACRONYMS

NPFMC	North Pacific Fishery Management Council
NPS	National Park Service
NRHP	National Register of Historic Places
OHA	Alaska Office of History and Archaeology
PAHs	polycyclic aromatic hydrocarbons
PCBs	polychlorinated biphenyls
RCRA	Resource Conservation and Recovery Act
SWMU	Solid Waste Management Unit
USACE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
UXO	unexploded ordinances
WWII	World War II

1 INTRODUCTION

The USCG is proposing to demolish in-water facilities at two sites on Base Kodiak, Alaska:

- Marginal Wharf at the southwestern tip of the Nyman Peninsula in Inner Womens Bay, and
- A seawater intake structure and concrete pile cap (collectively seawater intake structures) near the northeastern end of the Nyman Peninsula in Inner Womens Bay (collectively the Kodiak Waterfront Demolition Projects) (Exhibit 1-1).

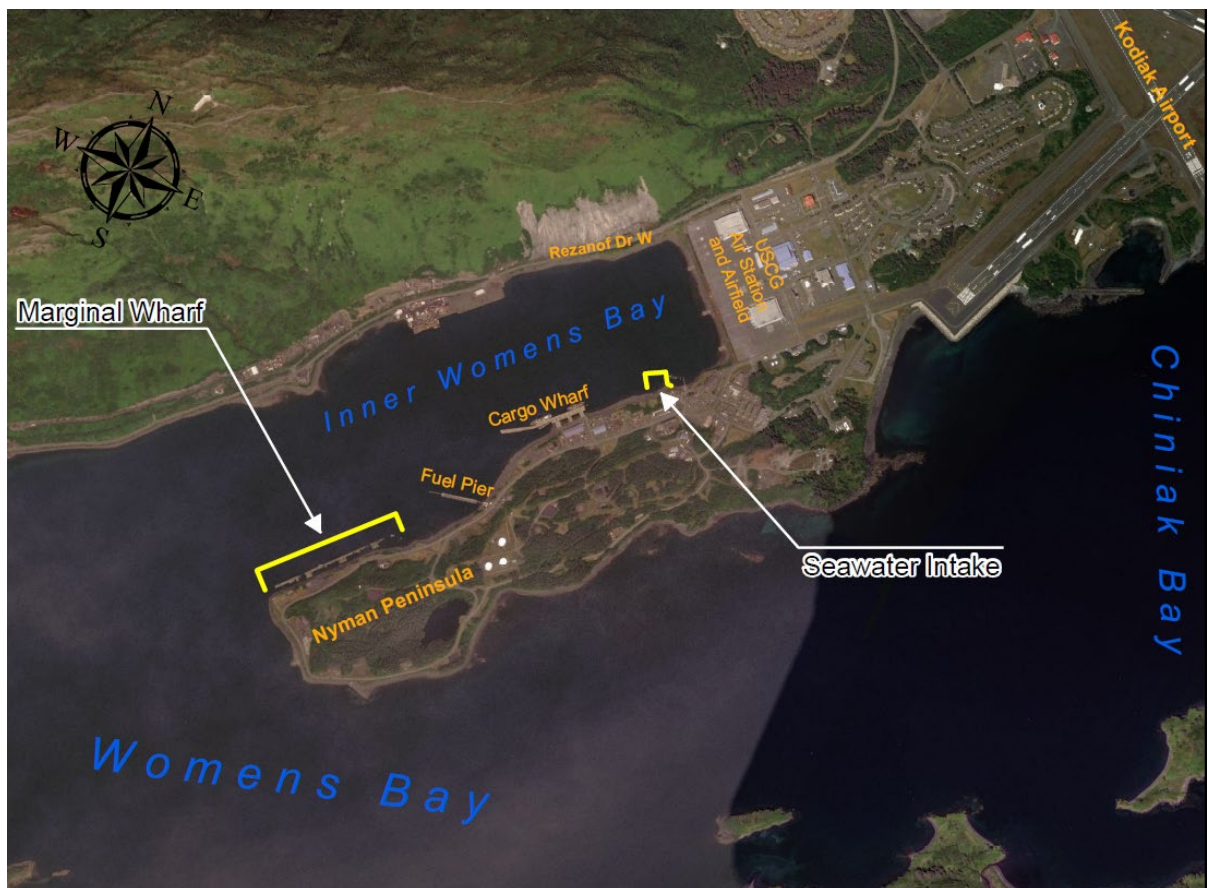


Exhibit 1-1: Project Sites Proposed for Demolition at U.S. Coast Guard Base Kodiak

These existing facilities are derelict and obsolete, and present hazards to the natural environment, navigation, and public health and safety. None of the facilities satisfy current or future planned USCG mission requirements.

The USCG as the lead agency has prepared this environmental document pursuant to the NEPA of 1969 (42 U.S.C. 4321 *et seq.*; NEPA), the CEQ regulations implementing NEPA (40 CFR §1500 *et seq.*), and Department of Homeland Security Management Directive 5100.1

and USCG Commandant Instruction M16475.1D. The information and analysis contained in this EA will determine whether implementing the alternatives for the Kodiak Waterfront Demolition Projects would result in a significant impact on the environment, requiring the preparation of an environmental impact statement, or if no significant impacts would occur and a FONSI would be appropriate.

1.1 Project Background

The Marginal Wharf is located within Inner Womens Bay parallel to the northwest shore of the tip of the Nyman Peninsula (Exhibit 1-1). The timber wharf was constructed in 1942 to assist WWII naval warfare operations. The wharf holds historical significance due to its association with the former Kodiak Naval Operating Base, which has National Historic Landmark status. However, due to discontinued maintenance after the 1964 Alaska earthquake and fungal and marine borer's attack, the wharf is in a state of severe deterioration. The Base's 1996 Master Plan notes that Marginal Wharf was being used at the time of Master Plan preparation for storage of buoys, anchor chains, and sinkers (MAKERS Architecture and Urban Design, 1996). According to the more recent Waterfront Development Plan (Michael Baker Jr., Inc., 2009), the "deck and piling are being torn loose and a portion of this structure is being washed away with each storm as it continues to decay." Large portions at the ends of the above-water platform are missing from the structure, and the remaining portion of the platform has become vegetated with shrub and grass species.

The seawater intake, also constructed during the WWII era, is located at the northeast end of the Nyman Peninsula just south of the Womens Bay boat dock. The intake consists of a rectangular concrete structure housing a 30-inch-diameter concrete pipe that supplied a WWII electric power plant with cooling water. A series of smaller concrete piers extended landward to the power plant, supporting a walkway that provided access from the plant to the intake. The concrete structures are severely deteriorated, and the walkway was removed decades ago.

1.2 Purpose and Need

Ongoing inspections during the past several decades of the proposed project areas have determined that the remaining structures are no longer functional due to their current state of severe degradation. As the structures deteriorate, contaminated debris and other structural materials accumulate on the substrate or are mobilized and dispersed to other areas of Womens Bay or surrounding waters and shores. The purpose of the proposed action is to remove derelict in- and over-water structures from the Base Kodiak waterfront

that present navigation hazards, contain hazardous materials, present other human health and safety concerns, and no longer support Base Kodiak's mission.

1.3 Public Involvement

CEQ regulations implementing NEPA require federal agencies to "involve environmental agencies, applicants, and the public, to the extent practicable, in preparing [environmental] assessments" (40 CFR 1501.4[b]).

On February 12, 2021, the USCG published a Notice of Availability (NOA) of the Draft EA in the legal notices section of the Kodiak Daily Mirror. The notice directed interested parties to request an electronic version of the Draft EA via e-mail. On February 18, an NOA letter and the draft EA were emailed to a list of federal, state, and local agencies; native Tribes and Tribal entities; and other non-governmental organizations known to or thought to have an interest in the proposed action. Per the published and emailed NOA, the 30-day review and comment period began on February 19 and continued to March 22.

One comment letter was received during the comment period. The U.S. Environmental Protection Agency (EPA) expressed concerns regarding potential asbestos emissions, effects of environmental pollutants on children, and compliance with the Endangered Species Act and Marine Mammal Protection Act. The EPA's concerns were addressed through minor updates to information provided in Sections 3.2 (Air Quality), 3.5 (Biological Resources), and 3.7 (Hazardous Materials and Human Health).

The published NOA, NOA letter, email distribution list, and the EPA's comment letter are included in Appendix A.

The Notice of Availability of the Final EA and FONSI was published in the *Kodiak Daily Mirror* on June 18, 2021, indicating completion of the EA.

2 ALTERNATIVES

2.1 No Action

CEQ's regulations implementing NEPA require inclusion of a No Action Alternative to serve as a baseline against which the impacts of the proposed action and any alternatives can be evaluated. Under the No Action Alternative, the existing facilities would continue to degrade without maintenance, posing risks to the environment, navigation, and human health and safety.

2.2 Proposed Action

Under the Proposed Action, the Marginal Wharf and remnant concrete structures that supported the old power plant's seawater intake would be removed.

2.2.1 Marginal Wharf

The remaining Marginal Wharf structure is approximately 1,700 feet long and 30 feet wide, with wider platform areas and shoreward projections that provided a connection to the shore at one time. Exhibits 2.2-1 and 2.2-2 show the current condition of Marginal Wharf; Exhibit 2.2-3 shows a typical section of Marginal Wharf when it was intact.

The 12-inch-diameter creosote-treated piles are in varying states of decay and many are missing, likely laying on the bottom or washed out of the project area in tides or storms. A count of the piles indicates that there are approximately 1,236 piles that extend above the mean low water line and an assumed additional 203 piles that have broken off below the mean low water line. Many of the piles are hollow, with only the creosote-treated shell remaining. Ten piles are collectively topped with two large concrete pile caps. A community of barnacles, mussels, starfish, and other aquatic life were observed on the piles.

The deck of the Marginal Wharf is also substantially degraded, with large sections missing and the remainder structurally unsound. The total area of semi-intact decking that remains is approximately 54,300 square feet. A variety of utility boxes, cleats, and conduit remain on the deck or are suspended from the deck. A small building (approximately 208 square feet) with asbestos cement board siding has partially fallen through the deck.

This alternative would remove all the over-water and in-water structures, limited by the capabilities of the equipment and the condition of the structures, and would require disposal of wharf-related debris in suitable landfills approved for hazardous materials. Accessible debris (e.g., old piles or timbers, and metal objects) in the intertidal/beach area would also be removed if it can be extracted without disturbing the substrate. No modification of existing riprap armoring or timber bulkhead is proposed. All the work would be conducted from barges or work boats and would follow the BMPs for in-water work and pile removal described in Section 2.2.3. If needed, smaller landing craft may be used to ferry people and equipment between the shore and the offshore barge.



Exhibit 2.2-1: Photos of Marginal Wharf on July 18, 2019



Exhibit 2.2-2: Photos of Marginal Wharf on July 18, 2019 (Upper: Old Conduit and Utility Structures; Lower: Shed with Cement Asbestos Board Siding)

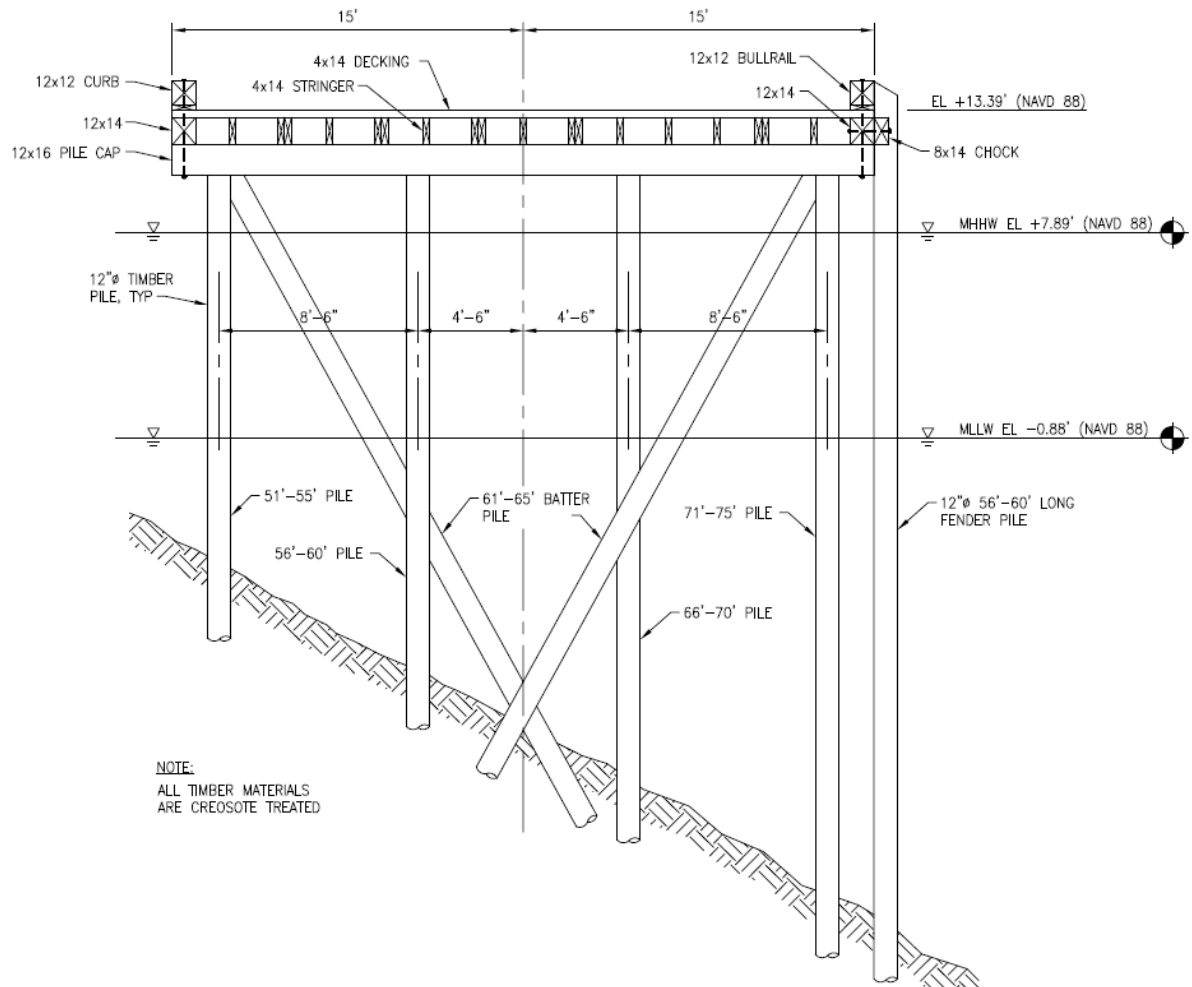


Exhibit 2.2-3: Typical Section of Intact Marginal Wharf (from Sheet C104 of August 2020 95% Plan Set by Reid Middleton)

2.2.2 Seawater Intake

The seawater intake is a concrete pier structure built-in 1941 to intake offshore saltwater for a WWII electric power plant, and then decommissioned in 1981 when the USCG found an alternate power source. The approximately 250-foot-long and 4-foot-wide (1,000 square feet) pier was supported by concrete pile caps and steel H piles. Concrete decking was previously removed, and the pier foundations (pile caps and piles) and seawater intake structure at the end remain. Exhibit 2.2-4 shows the current condition of the intake structures proposed for removal.



Exhibit 2.2-4: Photos of the Seawater Intake Structures on July 18, 2019 (Upper: Concrete Pile Cap in the Foreground and Intake Structure in the Background; Lower: Close-Up of the Intake Structure)

The proposed action includes removal of the concrete intake structure and surrounding creosote-treated timber rub boards and the remaining concrete pile cap that is waterward of the high tide line (Exhibit 2.2-5). Currently, the surface area of the pile cap is 10 square feet and the intake structure, topped by a railing and light post, is approximately 70 square feet. The removal of the deteriorated intake structure above the mudline will expose a void in the intake below the mudline that will be filled with approximately 6 cubic yards of crushed gravel. Piling, pile caps, and concrete salt-water intake piping buried several feet below the mudline are not proposed to be demolished as part of this project. Anticipated equipment usage includes a barge, concrete (wire) saw equipment, diver support, and a small support skiff.

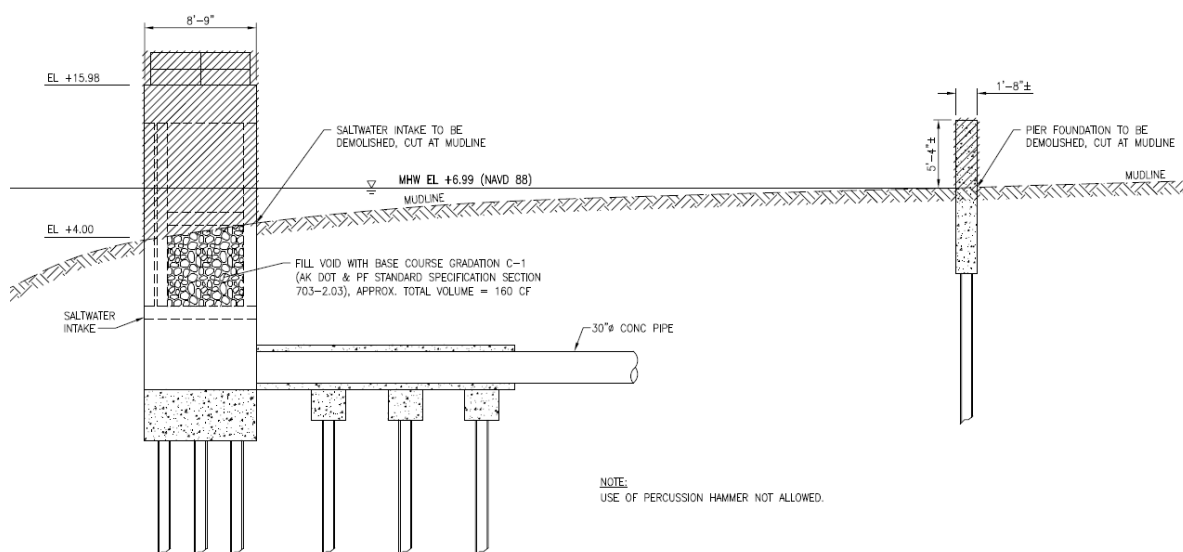


Exhibit 2.2-5: Existing Seawater Intake Structures and Proposed Demolition Plan (from Sheet C304 of August 2020 Plan Set by Reid Middleton)

2.2.3 General Best Management Practices (BMPs)

The Proposed Action takes place entirely in the aquatic environment, which contains sensitive habitats and species that require special consideration to protect them from incidental harm during demolition activities.

Included in the Proposed Action are a number of conservation measures that were developed with technical assistance from the U.S. Fish and Wildlife Service (USFWS) and through initial discussions with NOAA Fisheries during preparation of this EA. Permits or approvals from these and other agencies with jurisdiction over the Proposed Action are being pursued concurrently with EA preparation. Any other measures that are required during project-specific reviews by those agencies will also be incorporated.

Demolition of the existing, degraded facilities requires operation of equipment in and over the water and removal of in-water structures. The following BMPs to protect water quality and aquatic life will be required by the USCG to be employed, as applicable, on each project.

2.2.3.1 In-Water Work

- Prior to in-water work, an underwater magnetometer survey shall be completed to identify presence of partially buried and buried explosive ordnance. If any ordnance is located, appropriate measures to protect safety of workers and water quality would be developed and implemented.
- Care will be taken to minimize debris, including sawdust and concrete rubble, from entering water during demolition and construction and to remove debris promptly if it does enter the water. Materials and construction methods shall be used that avoid or minimize introduction of toxic materials, petrochemicals, and other pollutants from entering surface water during and after construction. Appropriate equipment and material for hazardous material cleanup must be kept at site.
- Absorbent materials must be employed if petrochemical sheen is observed. Materials shall remain in place until all pollutants have been collected to the extent feasible and sheens dissipate. Used absorbent materials shall be stored in an appropriate upland facility until transported to a permitted treatment, storage, and disposal facility. Contractor to notify all required regulatory agencies and comply with reporting requirements. The Alaska Department of Environmental Conservation (ADEC) notification number is 1-907-269-3063.
- All disposed materials shall be deposited in a landfill that meets liner and leachate standards of ADEC, 18 Alaska Administrative Code 60, Solid Waste Management.
- Comply with all permit requirements.
- In-water debris boom and turbidity curtain shall be deployed around all active work areas and equipment during demolition and construction as necessary to control debris and meet water quality requirements. The debris boom and turbidity curtain shall remain in place until any suspended sediments have re-settled and pH has returned to background levels if elevated.
- Construction erosion control measures must be in place prior to any disturbance.

2.2.3.2 Pile Removal

- Vibratory extraction is the preferred method of pile removal.
 - To protect marine mammals, a “ramp-up” procedure will be followed. Sound should be initiated for 15 seconds at reduced energy followed by a 1-minute waiting period. This procedure will be repeated two additional times.
 - Operator to “wake up” pile to break bond with sediment.
 - Vibrate to break the skin friction bond between pile and soil.

- Bond breaking avoids pulling out a large block of soil – possibly breaking off the pile in the process.
 - Usually there is little or no sediment attached to the skin of the pile during withdrawal. In some cases, material may be attached to the pile tip, in line with the pile.
- Crane operator shall be trained to remove pile slowly. This will minimize turbidity in the water column as well as sediment disturbance.
- After removal of decking and pile caps, the Contractor shall provide a pile extraction plan that maximizes removal of piles in the dry, at lowest practical tide condition, and at slack water in that order to the extent practicable. The barge or work boats may not ground.
- The greatest potential for creosote introduction into the environment occurs if equipment (bucket, steel cable, and vibratory hammer) pinches the creosoted piling below the water line. Therefore, the extraction equipment used for pulling the pile must be kept out of the water.
- Piling must not be broken off intentionally by twisting, bending, or other deformation. This practice has the potential for releasing creosote to the water column.
- Work surface on barge deck or pier shall include a containment basin for pile and any sediment removed during pulling.
- The basin may be constructed of durable plastic sheeting with sidewalls supported by hay bales or other structure to contain all sediment. Water runoff can return to the waterway after suitable treatment if it meets water quality standards.
- Upon removal from substrate, the pile shall be moved expeditiously from the water into the containment basin. The pile shall not be shaken, hosed off, left hanging to drip dry, or any other action intended to clean or remove adhering material from the pile.
- Work surface shall be cleaned by disposing of sediment or other residues along with cut-off piling as described below.
- Containment basin shall be removed and disposed in accordance with BMPs below or in another manner complying with applicable federal and state regulations.
- Cutting will be necessary if the pile has broken off below the water line or at or near the existing substrate so that it cannot be removed without excavation. Pile cutoff is an acceptable alternative if vibratory extraction or pulling is not feasible. Every attempt should be made, however, to completely remove the piling in its entirety before cutting. If a pile is broken or breaks more than 2 feet above the mudline during vibratory extraction, one of the methods listed below should be used to cut the pile. Prior to commencement of the work, the Contractor shall assess the condition of the pilings. The Contractor shall create a log outlining the location and number of pilings that need to be cut and have this log available to the agencies upon request.
 - A chain should be used, if practical, to attempt to entirely remove the broken pile.

- If the entire pile cannot be removed, piling should be cut off just above the mudline.
- Piles shall be cut off at lowest practical tide condition and at slack water. This is intended to reduce turbidity due to reduced flow and short water column through which pile must be withdrawn.
- If the piling is broken off less than 2 feet above the mudline or below the mudline, the piling may remain.
- The Contractor shall provide the location of the broken or cut pile. This will be necessary as part of debris characterization should future dredging be a possibility in the area of piling removal.

Exhibit 2.2-6 shows the typical pile removal detail.

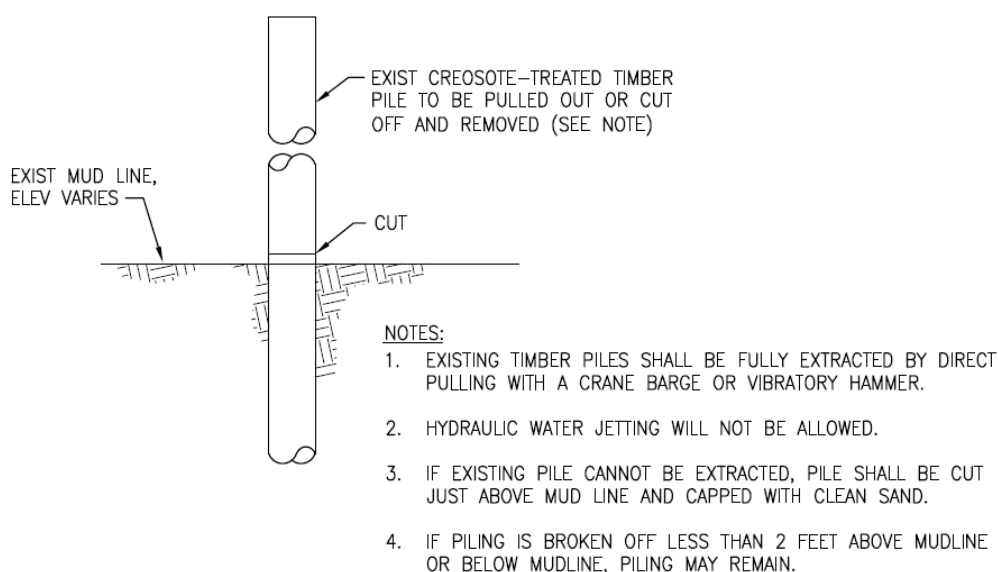


Exhibit 2.2-6: Typical Pile Removal Detail (from Sheet C304 of August 2020 Plan Set by Reid Middleton)

2.2.3.3 Disposal of Piling, Sediment, and Construction Residue

- Pulled pile shall be placed in a containment basin to capture any adhering sediment. This should be done immediately after the pile is initially removed from the water.
 - Utilize basin setup on the barge deck.
 - Basin may be made of hay bales and durable plastic sheeting.
- Piling shall be cut into lengths as dictated by the disposal facility with standard chainsaw.
- Piling, sediments, construction residue, and plastic sheeting from the containment basin shall be placed into a container for disposal. Material must be disposed of at a USCG-approved licensed solid waste disposal facility in compliance with federal and state regulations.

- Hazardous materials, including but not limited to asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs)-containing wiring, and contaminated sediments, shall be separated and contained separately from non-hazardous materials and disposed of at a USCG-approved licensed solid waste disposal facility permitted to accept hazardous wastes in compliance with federal and state regulations.

2.2.3.4 Marine Mammal Protection

To avoid harm to and harassment of listed and protected marine mammals, the USCG proposes to establish a marine mammal monitoring hazard area, also known as an exclusion zone, of 100-meter radius (centered on project activity at or below mean higher high water [MHHW]) for the northern sea otter and 940-meter radius for Steller sea lion, whales, and other marine mammals during demolition activities (see list of marine mammals in Exhibit 2.2-7).

Exhibit 2.2-7: List of Marine Mammals Subject to Observation

Species	Protection Authority ¹	Potential to Be in Hazard Area
Cuvier's beaked whale <i>Ziphius cavirostris</i>	MMPA	Low
Dall's porpoise <i>Phocoenoides dalli</i>	MMPA	Low
Fin whale <i>Balaenoptera physalus</i>	ESA, MMPA	No
Grey whale <i>Eschrichtius robustus</i>	ESA, MMPA	No
Harbor porpoise <i>Phocoena</i>	MMPA	Low
Harbor seal <i>Phoca vitulina</i>	MMPA	High
Humpback Whale <i>Megaptera novaeangliae</i>	ESA, MMPA	Low
Killer whale <i>Orcinus orca</i>	MMPA	Low
Minke whale <i>Balaenoptera acutorostrata</i>	MMPA	Low
North Pacific right whale <i>Eubalaena japonica</i>	ESA, MMPA	No
Northern fur seal <i>Callorhinus ursinus</i>	MMPA	Low
Northern Sea Otter <i>Enhydra lutris kenyoni</i>	ESA, MMPA	High

Species	Protection Authority ¹	Potential to Be in Hazard Area
Pacific white-sided dolphin <i>Lagenorhynchus obliquidens</i>	MMPA	Low
Sperm whale <i>Physeter macrocephalus</i>	ESA, MMPA	No

NOTES:

ESA = Endangered Species Act, MMPA = Marine Mammal Protection Act

NOAA Fisheries concurred with the exclusion zones for species under its jurisdiction on March 26, 2021, and USFWS concurred with the exclusion zones for species under its jurisdiction on April 19, 2021. A dedicated monitor will record observations of marine mammals within the area and will follow the procedures established in USFWS's *Observer Protocols for Pile Driving, Dredging and Placement of Fill* (USFWS, 2012) for the northern sea otter and the most recent version of NOAA Fisheries' Alaska Region marine mammal standard mitigation measures for other species. The monitor will have the authority to halt and re-start project activities when mammals enter and leave their respective hazard areas. The Contractor will also be required to implement ramp-up procedures outlined in the USFWS and NOAA Fisheries protocol.

If local sea otter activity results in excessive shutdowns, the USCG will reinstate discussion with the USFWS to discuss alternatives.

2.2.3.5 Listed Bird Protection

To avoid harm to and harassment of Steller's eider, the USCG will establish a monitoring hazard area of 100-meter radius (centered on project activity at or below MHHW) during demolition activities if they occur between November 1 and April 30. The monitor will record observations of Steller's eider within the area and will follow the procedures established in USFWS's *Observer Protocols for Pile Driving, Dredging and Placement of Fill* (USFWS, 2012). The monitor will have the authority to halt and re-start project activities when any Steller's eiders enter and leave the hazard area. The Contractor will also be required to implement ramp-up procedures outlined in the USFWS protocol.

The short-tailed albatross is not anticipated to be near the hazard area or Kodiak Island. In the unlikely event that it is observed, the protocol that applies to the eider will be followed for the albatross.

2.2.3.6 Migratory Bird Protection

The Marginal Wharf and seawater intake structures would be surveyed for active nests no more than three days prior to the start of demolition activities during the migratory bird

breeding season (early spring to early fall). If more than three days have passed since demolition activities have occurred at a specific site, that area will be resurveyed prior to commencement of work.

If an active nest is discovered (this includes nest building through fledging), a 300-foot buffer would be established around the nest and the nest would be monitored for potential indicators of stress including flushing. Based on these observations the buffer may be reduced by a qualified biologist if it appears that a reduced buffer does not alter the bird's behavior. The buffer will remain in place until the young have fledged.

2.2.4 Permits and Approvals

2.2.4.1 Endangered Species Act (ESA)

Section 7 of the ESA, as amended, applies to federal agency actions and sets forth requirements for consultation with USFWS and or NOAA Fisheries, depending on the species, to determine if the proposed action may affect an endangered or threatened species or critical habitat. Section 7 consultation for proposed demolition of in-water structures is necessary because of the potential for four federally listed species to occur, seasonally or sporadically, in the project area, and because of the presence of designated critical habitat for two species.

The USCG determined that the proposed action may affect, but is not likely to adversely affect, threatened and endangered species and designated critical habitat. A biological assessment (BA) evaluating the effects of the proposed action on these species and habitats was prepared and submitted to USFWS and NOAA Fisheries on February 24, 2021. Coordination with USFWS and NOAA Fisheries occurred during EA and BA development, which is reflected in the impact minimization measures contained within the BA and incorporated in this EA.

NOAA Fisheries provided the USCG with updated marine mammal monitoring and mitigation measures on March 9. After USCG confirmation that those measures would be incorporated into the project, NOAA Fisheries issued its concurrence with the BA's determinations of effect for species under its jurisdiction on March 26, 2021 (Appendix B). USFWS issued its concurrence letter on April 19, 2021 (Appendix B).

2.2.4.2 Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act, passed in 1976 and reauthorized in 2006, mandates that NOAA Fisheries must identify EFH for all federally managed marine fish. Federal agencies are required to consult with NOAA Fisheries on all activities, or proposed activities, authorized, funded, or undertaken by the agency that may

adversely affect EFH. The North Pacific Fishery Management Council (NPFMC) has designated EFH for the following fisheries that overlap with the project areas: the Gulf of Alaska (GOA) Groundfish Fisheries Management Plan (FMP) and the Salmon Fisheries in the United States Exclusive Economic Zone (EEZ) off the Coast of Alaska FMP (NPFMC, 2018 and 2019).

The USCG determined that the Proposed Action would not have permanent adverse effects on EFH. The USCG initiated consultation with NOAA Fisheries as part of its ESA consultation requirements in February 2021 and requested its concurrence with these determinations. NOAA Fisheries' letter of concurrence under the ESA included recognition of the USCG determinations and "numerous mitigation measures" already incorporated into the project, and offered three additional EFH Conservation Recommendations (see Appendix B). The first recommendation was to conduct the project outside of salmon migration season; according to Alaska Department of Fish and Game (ADF&G), adult peaks are from mid-May through September. Given the nature of the project and the project's location in a bay with no tributaries, the potential for conflict with migrating salmon is very low. The project duration, contractor availability, weather constraints, and migratory bird nesting will largely control construction timing. The second recommendation, to include an oil spill prevention/control plan and a plan for minimizing the spread of invasive species in the project's Environmental Protection Plan, is a standard practice by the USCG in conducting all its projects in waterways. The third recommendation, to "ensure rock for rubble mound construction will be free of contaminants and invasive species," is not applicable to the project and presumed to be a relic from another project's concurrence letter.

2.2.4.3 The Marine Mammal Protection Act

The Marine Mammal Protection Act of 1972 prohibits the "taking" of all marine mammals. The Act defines "take" as "to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill..." "Harassment," which is the form of take most commonly a risk of in-water work such as the proposed projects, is more particularly defined as "any act of pursuit, torment, or annoyance which (i) has the potential to injure a marine mammal or marine mammal stock in the wild; or (ii) has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering."

The USFWS and NOAA Fisheries are jointly charged with implementing the Act. USFWS has authority over sea otters, and NOAA Fisheries has authority over whales, seals and sea lions, and other marine mammals, similar to the division of their authority under the ESA.

The USCG has determined that the Proposed Action would avoid the take of marine mammals through its commitment to implementing standard conservation measures originally developed with technical assistance from the USFWS and NOAA Fisheries and routinely applied to pile-related project activities at Base Kodiak. NOAA Fisheries provided updated measures during the ESA consultation process that will be implemented.

2.2.4.4 Migratory Bird Treaty Act (MBTA)

The following characterization of the MBTA is excerpted from USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

"The Migratory Bird Treaty Act (MBTA) of 1918 is the domestic law that affirms, or implements, the United States' commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource. Each of the conventions protect selected species of birds that are common to both countries (i.e., species occur in both countries at some point during their annual life cycle). Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, directs federal agencies to take certain actions to further implement the MBTA and to conserve migratory birds (US Fish and Wildlife Service 2009d). The order prohibits the take of migratory birds, their eggs, feathers, or nests."

In 2019, the Trump administration updated the MBTA to apply only to affirmative actions, or those actions where the purpose is to take or kill a migratory bird. The final rule incorporating this update was published by USFWS on January 7, 2021 (USFWS, 2021a). The final rule clarified the scope of the MBTA to only extend to conduct *intentionally* injuring birds, and to not include take that is incidental. However, on February 5, three days before the final rule would have gone into effect, the Biden administration pushed back the effective date to March 8, 2021 and requested additional public comments through March 1 (USFWS, 2021b). On May 6, 2021, the USFWS published its proposal to revoke the January rule and will be accepting comments through June 7, 2021. It is recommended that USFWS be contacted to determine what the requirements might be for this project prior to the commencement of work.

Regardless of the law's status, the USCG has a Memorandum of Understanding (MOU) with USFWS pursuant to Executive Order 13186 in which the USCG commits to avoiding all incidental take of MBTA species. The USCG remains committed to implementing this MOU regardless of the current regulatory allowances or limitations.

2.2.4.5 Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act of 1934, as amended, requires federal agencies or federal agency permittees or licenses to consult with "...Federal, State, and public or private agencies and organizations in the development, protection, rearing, and stocking of all species of wildlife, resources thereof, and their habitat, in controlling losses of the same from disease or other causes, ... and in carrying out other measures necessary to effectuate the purposes of this Act" when the agency, permittee or licensee is seeking to modify a body of water. After coordination with USFWS, NOAA Fisheries, and ADF&G, the list of potentially important wildlife resources in the Project area not already specifically addressed under the laws outlined in Sections 2.2.4.1 through 2.2.4.4 include red king crab (*Paralithodes camtschaticus*) and, to a lesser degree, Tanner crab (*Chionoecetes bairdi*). These two species are managed by NOAA Fisheries and ADFG.

The USCG has determined that the proposed action would have minor adverse impacts on NOAA trust resources during demolition activities, and that BMPs and conservation measures developed in consultation with NOAA Fisheries would avoid significant adverse effects on NOAA trust resources.

2.2.4.6 Rivers and Harbors Act and Clean Water Act

The U.S. Army Corps of Engineers (USACE) administers both Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. Section 10 prohibits the unauthorized obstruction or alteration, including temporary work activities, of any navigable water of the United States below the mean high water line of tidal waters. The removal of in-water structures below the mean high water line of Inner Womens Bay requires authorization from the USACE under Section 10.

Section 404 of the Clean Water Act governs discharges of dredge or fill materials into the waters of the United States, including tidal waters. Any proposed fill located below the high tide line requires authorization under a Nationwide Permit or an Individual permit. The placement of crushed gravel within the void left after demolition of the seawater intake structure is a regulated fill.

The USCG consulted with the USACE during preparation of this EA regarding the need for a permit under either Section 10 or Section 404. It was ultimately concluded by the USACE that Nationwide Permit 3 (Maintenance) and Nationwide Permit 18 (Minor Discharge) would cover all project activities without the need for pre-construction notification because the USCG is the lead agency for ESA and Section 106 compliance and because the anticipated 6 cubic yards of fill is below the notification threshold (Mitzel, pers. comm., 10 July 2020).

2.2.4.7 National Historic Preservation Act (NHPA)

The NHPA establishes national policy for protecting significant cultural resources that are defined as “historic properties” under 36 CFR 60.4. NHPA Section 106 (36 CFR §800) requires that federal agencies consider and evaluate the effect that federal projects may have on historic properties under their jurisdiction.

The USCG has determined that under the terms of Section 106 the proposed action would adversely affect one historic property, the Marginal Wharf, a contributing resource to the Kodiak Naval Operating Base National Historic Landmark (Kodiak NOB NHL). The National Park Service (NPS) and Alaska Office of History and Archaeology (OHA) have concurred with the adverse effect determination, and have begun consultation with the USCG on a memorandum of agreement to mitigate for the adverse effect.

Cultural and historic resources are further discussed in Section 3.12.

2.2.4.8 Environmental Management Plan (EMP)

An EMP establishes working restraints, requirements, and methods to be followed at sites within or near areas with known environmental contamination. The document serves as a summary of environmental conditions, assigns roles and responsibilities, details work practices concerning hazardous materials and/or contaminated media, and summarizes required health and safety monitoring.

Due to the potential for sediment contamination, suspected PCB contamination in wiring, known ACM, and proximity to Resource Conservation and Recovery Act (RCRA) sites, an EMP will be created for the project and will be provided to the USCG, ADEC, and the EPA for comment and approval. The work will be conducted in accordance with the approved project EMP.

2.3 Alternatives Considered but Dismissed

2.3.1 Recapitalize One or More of the Facilities

2.3.1.1 Marginal Wharf

Over the years, the USCG has considered several scenarios that would partially or entirely demolish the condemned Marginal Wharf and then construct new structures in its place or waterward (Michael Baker Jr., Inc., 2009; USCG, 2019). All the Marginal Wharf reconstruction options were ultimately dismissed for the following reasons:

- Plans for replacement of other waterfront structures were abandoned, which eliminated the need for alternative berthing and other operations to take place at a rebuilt Marginal Wharf
- High cost of new construction
- The Marginal Wharf had become habitat for crustaceans, mollusks, and juvenile red king crab¹

Any recapitalization of the Marginal Wharf would not meet the purpose and need discussed in Section 1.2, Purpose and Need.

2.3.1.2 Seawater Intake

The seawater intake structures supported the original Navy base's power plant, which was constructed in the 1940s. This system was replaced in 1981 when the USCG shifted its electricity supply to the Kodiak Electric Association's Terror Lake Hydroelectric Plant. The seawater intake and associated structures have remained unused for nearly 40 years. A restored seawater intake is not needed to support the USCG's mission.

2.3.2 Retain Portions of the Remaining Marginal Wharf

Retention of some of the remaining Marginal Wharf, a variation on the No Action Alternative, would only temporarily extend the existence of the structure. A 1996 *Kodiak Master Plan* (MAKERS, 1996; see discussion in Section 3.6.1.2) identified retention of the piles for red king crab habitat as a preferred alternative, to include marking of the piles to reduce navigation hazard. Without significant investment, the wharf will continue to collapse, releasing debris and hazardous materials into Inner Womens Bay which are detrimental to navigation, public safety, and the environment. Accordingly, this potential alternative was not considered further.

¹ The red king crab concerns were based largely on older information about high levels of use of the Marginal Wharf piles by podding crabs. As discussed in Section 3.5.1.5, red king crab use has declined substantially in the last three decades.

4 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

This chapter describes the existing environmental conditions of Base Kodiak, focusing on those resources potentially affected by the proposed action. These resources include air quality; geology and soils; water resources and water quality; biological resources; land use; hazardous materials and human health; noise; transportation; infrastructure, utilities, and services; visual resources; and cultural and historic resources. The following resources are not affected as summarized below, and will not be discussed further in this EA:

1. Socioeconomics: Socioeconomic assessment would typically evaluate a project's potential to affect employment, commerce, local demographics, or other measures of a community or population's wellbeing. The existing facilities proposed to be demolished do not contribute to or affect any of these parameters either directly or indirectly. Implementation of the Proposed Action would provide a beneficial short-term employment opportunity for construction workers and may support the local economy through hotel, restaurant or other retail spending depending on the source of that work force.
2. Environmental justice: Environmental justice would typically be evaluated if a project could have "disproportionately high and adverse human health or environmental" effects on minority or low-income populations. According to the U.S. Census Bureau's 2018 population estimates, the Kodiak Island Borough is 45% minority and 8.2% at or below the poverty line. However, the nature and location of the project precludes adverse effects on minority or low-income populations, including minority and low-income.
3. Recreation: The seawater intake is located approximately 100 feet south of the USCG Boat House dock, which is part of the Base's recreation facilities. It hosts a number of boats that can be rented by Base personnel and their families who may travel through the project area to reach recreation sites. The Proposed Action will not interfere with use or operation of the Boat House dock and its boats.
4. Coastal zone resources: The Federal Coastal Zone Management Act (CZMA) of 1972 was enacted to "preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation's coastal zone." The CZMA established three national volunteer partnership programs with coastal states, which include the National Coastal Zone Management Program, the National Estuarine Research Reserve, and the Coastal and Estuarine Land Conservation Program under the guidance of NOAA. Alaska passed the Alaska Coastal Management Act in 1977 and adopted the Alaska Coastal Management Program (ACMP) in 1979. The State of Alaska allowed the ACMP to expire in 2011, which effectively withdrew it from the National Coastal Zone

Management Program. Alaska continues to participate in the National Estuarine Research Reserve and the Coastal and Estuarine Land Conservation Program, which apply only to Kachemak Bay.

Following a discussion of the affected environment for each resource is a discussion of the environmental impacts that could result from implementing the alternatives described in Chapter 2.

4.2 Air Quality

4.2.1 Affected Environment

The following characterization of atmospheric conditions of Kodiak Island is excerpted from USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

Climate

"The climate in Kodiak is characterized as maritime, with long, mild winters and short, cool summers. Year-round weather is affected by cool and humid air masses due to proximity to the Pacific Ocean. Limited daily and annual temperature ranges are typical for Kodiak's climate. The average annual temperature ranges from 38 degrees Fahrenheit (°F) to 41°F. During the summer, the mean air temperature closely approximates the mean sea surface temperature. The air temperature usually rises slightly above the mean sea surface temperature during August but falls below it in September. In winter, the mean maximum air temperature more closely resembles the mean sea surface temperature curve. The highest daily maximum temperatures occur with northwest winds in summer (US Forest Service 2009).

Precipitation is abundant throughout the year, but varies widely in amount depending on the month. Average annual precipitation ranges from 50 to 70 inches. A very high percentage of the precipitation falls during northeast to southeast winds. Small amounts of snow may fall as late as May or as early as September, with ground cover anticipated in November. Precipitation measurement is often difficult due to strong, gusty surface winds that frequently accompany precipitation. Although the prevailing wind direction is northwesterly every month except May, June, and July, and the average speed is about 10 knots, NOAA data indicate extreme variability in both direction and speed. NOAA has recorded wind gusts over 90 knots. Coast Guard cutters docked in Women's Bay have reported williwaw winds (sudden blasts of wind descending from the mountainous coast to the sea) off nearby mountains in excess of 120 knots. Gusts of over 50 knots have occurred

during each month of the year but are most likely to occur in the winter months (US Forest Service 2009).

Air Quality

The Clean Air Act (CAA) of 1970, as amended (42 USC §§ 7401 et seq.) regulates emissions from stationary, mobile, and area sources and establishes national ambient air quality standards for pollutants that can harm human health or the environment. Under the CAA, the US Environmental Protection Agency (EPA) is responsible for revising these standards when necessary as new air quality data and related impacts on the human environment become available.

National Ambient Air Quality Standards

National ambient air quality standards have been adopted for six criteria pollutants—ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter (PM10 and PM2.5), and airborne lead. The national ambient air quality standards may include primary or secondary standards. Primary standards set limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Averaging periods vary by criteria pollutants based on potential health and welfare effects of each pollutant. The national ambient air quality standards are enforced by the states via local air quality agencies. States may choose to adopt their own air quality standards, but state standards must be at least as stringent as federal standards. Alaska has adopted the federal standards as the state standards. [Exhibit 3-1] lists the national ambient air quality standards.

Exhibit 3-1: National Ambient Air Quality Standards

Pollutant	Averaging Times	Ambient Concentration Standard ¹	Primary (P) or Secondary (S) standard ²
Ozone	8 hours	0.075 ppm (147 µg/m ³)	P, S
Carbon monoxide	1 hour	35 ppm (40 mg/m ³)	P
	8 hours	9 ppm (10 mg/m ³)	P
PM ₁₀	24 hours	150 µg/m ³	P, S
PM _{2.5}	24 hours	35 µg/m ³	P, S
	Annual	15 µg/m ³	P, S
Nitrogen dioxide	Annual	0.053 ppm (100 µg/m ³)	P, S
Sulfur dioxide	3 hours	0.5 ppm (1,300 µg/m ³)	S
	24 hours	0.14 ppm (365 µg/m ³)	P
	Annual	0.03 ppm (80 µg/m ³)	P
Lead	Quarterly Average	1.5 µg/m ³	P, S

NOTES:

1 mg/m³ = milligrams per cubic meter; µg/m³ = micrograms per cubic meter

2 P = primary standard (health-based); S = secondary standard (welfare-based)

ppm = parts per million

Source: 40 CFR Part 50

Areas that violate air quality standards are designated as “nonattainment” areas for the relevant pollutants. Areas that comply with air quality standards are designated as “attainment” areas for the relevant pollutants. Areas of questionable status are generally designated as “unclassifiable” areas. Kodiak Island is in an area designated as unclassifiable or attainment for all of the criteria pollutants.

As an attainment area, Kodiak Island is classified as a Class II area under CAA Prevention of Significant Deterioration guidelines (US Environmental Protection Agency 2009g). Air quality control regions are classified either as Class I, II, or III to indicate the degree of air quality deterioration that the state or federal government will allow while not exceeding national ambient air quality standards. As a Class II area, a moderate change in air quality due to industrial growth would be allowed while still maintaining air quality that meets the national ambient air quality standards.

Regional and Local Air Quality

The Alaska Department of Environmental Conservation (ADEC), Division of Air and Water Quality monitors air quality throughout Alaska. The State of Alaska does not maintain air monitoring equipment on Kodiak Island because of the minimal industrial activity and the history of good air quality in the area.

Clean Air Act Conformity Requirements

Section 176(c) of the CAA contains regulations that apply specifically to federal agency actions. This section of the CAA requires federal agencies to ensure that their actions are consistent with the CAA and with applicable air quality management plans (state implementation plans). Agencies are required to evaluate their proposed actions to make sure they would not cause or contribute to new violations of any federal ambient air quality standards, would not increase the frequency or severity of any existing violations of federal ambient air quality standards, and would not delay the timely attainment of federal ambient air quality standards.

EPA has promulgated separate rules that establish conformity analysis procedures for transportation-related actions and for other (general) federal agency actions. The EPA general conformity rule requires a formal conformity determination document for federal actions occurring in nonattainment areas or in certain designated maintenance areas when the total direct and indirect emissions of nonattainment pollutants (or their precursors) exceed specified thresholds. Because BSU [Base Support Unit] Kodiak is not located in a nonattainment area, the proposed action is exempt from the CAA general conformity rule.”

National Asbestos Standards for Hazardous Air Pollutants Conformity Requirements

Subpart M of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 61, identifies the National Emission Standard for Asbestos. This subpart requires work practice standards that control asbestos emissions during demolition. These work practices include the identification of asbestos prior to demolition, notification of the federal and/or local agency prior to impact to ACM, removing ACM, adequately wetting ACM, sealing ACM in a leak-tight container, and disposing of ACM appropriately. Demolition of the 208-square-foot building, which contains non-friable cement asbestos board siding, on the Marginal Wharf triggers the NESHAP Subpart M workplace standards.

4.2.2 Environmental Consequences

4.2.2.1 No Action

Under the No Action Alternative, the existing facilities would continue to degrade, posing risks to the environment, navigation, and human health and safety. No demolition or any use of air pollutant-generating equipment would occur; therefore, there would be no project-driven changes in air quality.

4.2.2.2 Proposed Action

Demolition activities would have minor adverse impacts on air quality. These impacts would be localized, temporary, and short-term and would occur from the following construction-related equipment and activities:

- Asbestos abatement;
- Barge operations; and
- Construction equipment operations, including cranes, vibratory hammers, and diesel-powered tools.

An accredited abatement contractor will be retained to complete the asbestos abatement work in accordance with the federal regulation. Whenever possible, non-friable ACM will be removed intact to minimize the potential for the release of asbestos fibers. In addition to following regulatory criteria, the abatement contractor will author an asbestos abatement work plan which details the unique challenges of abating asbestos from the Marginal Wharf. The abatement work plan will include measures taken to mitigate a release of asbestos including perimeter air monitoring, and an emergency response, notification, and cleanup plan in the event of an asbestos release. The use of institutional controls and air quality monitoring will minimize the risk of exposure by the public, including children, to asbestos. Additional discussion about hazardous materials, including asbestos, is provided in Section 3.7.

The Proposed Action would not result in any long-term changes in USCG operations that would increase discharges of airborne pollutants. Short-term and localized air quality degradation in the areas adjacent to equipment operations would quickly return to ambient conditions, and no regulatory thresholds would be exceeded. Therefore, the Proposed Action would not have a significant impact on air quality.

4.3 Geology and Soils

4.3.1 Affected Environment

The following characterization of the geological conditions of Kodiak Island is excerpted from the USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

Geological Setting

"Kodiak Island was extensively glaciated during the late Pleistocene. The topography near the planning area is characterized by glacially scoured hills that are about 100 meters above sea level (Combellick 1989). The underlying bedrock in the

region consists primarily of compacted and metamorphosed dark-gray to black mudstone, siltstone, sandstone, and conglomerate (Solie and Reifenstuhel 1989). Dominant lithologies on Nyman Peninsula are an interlayered cretaceous period Kodiak formation phyllite and metagraywacke (Brown 1989). Bedding typically is 1 to 4 centimeters thick and consistent throughout the area, with a prominent fracture system oriented approximately perpendicular to the bedding (Solie and Reifenstuhel 1989). The fine-grained nature of the rocks renders them highly impermeable, resulting in low yield of water wells and poor subsurface drainage.

Soils

The findings of a formal soil survey of northeastern Kodiak Island was [sic] published by the US Department of Agriculture, Soil Conservation Service in 1960. The project area was not included in this survey; however, soils can be assumed to be generally similar to those in adjacent parts of the island with similar topography and geology (US Department of Agriculture 1960). The history of glaciation in the area has led to deposits of till and clay sediment in low-lying areas, left when glaciers retreated. There is a thin, nearly continuous layer of pebbly, cobbly till overlain by silt loam two to five feet thick (Combellick 1989). Soils also contain layers of volcanic ash up to several inches thick due to volcanic ash fall from the Alaska Peninsula volcanoes. These soils are poorly to moderately drained, and where the vegetation cover is disturbed, they are easily eroded. Soils are generally very fine grained and clay rich. Alluvial sand and gravel are common along the Buskin River, and thin sandy and silty marine and beach sediments and organic rich marsh sediments are present along the margins of Women's Bay. These sediments are highly erodible and compressible and have low bearing capacity (Kodiak Island Borough 2006)."

Due to the historic uses in the project area, some soils contain elevated levels of certain contaminants. Site contamination is discussed in Section 3.7, Hazardous Material and Human Health.

Geologic Hazards

The following characterization of geologic hazards of Kodiak Island is excerpted from the USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

"The northeastern Kodiak region has a high seismic potential. A seismically induced liquefaction potential is present in fine-grained sediment marginal to Women's Bay. A high tsunami inundation and moderate subsidence potential exists in low-lying

areas along Women's Bay... In addition, there is severe erosion potential associated with the highly erodible ash-rich soils on slopes throughout the area, especially where the vegetation covering the soils is disturbed (Kodiak Island Borough 2006)."

4.3.2 Environmental Consequences

4.3.2.1 No Action

Under the No Action Alternative, the existing facilities would continue to degrade, increasing contamination of sediments and posing a risk to human health and safety if a seismic event occurred resulting in mobilization of piles and decking. No demolition would occur; therefore, there would be no project-driven changes in bank or substrate conditions. Continued soil contamination and risks to health and safety constitute a minor adverse impact to geology and soils.

4.3.2.2 Proposed Action

The Proposed Action would have minor adverse impacts on sediments below the high tide line during removal of the existing wood piles. No ground disturbing activity would occur above the high tide line. Extraction of the piles using a vibratory hammer could create small plumes of sediment as any material clinging to the pile is shed while the pile is lifted from the water onto the barge. A turbidity curtain would be used to contain turbidity until the material resettles on the substrate. The voids left by removal of the pile are anticipated to quickly fill with surrounding material, creating minimal opportunity for scour to further disturb the substrate. Therefore, no significant adverse impacts are expected for soils for this alternative. Due to the history of industrial use in the area, the possibility of contaminated soil exists in the project area. The potential for adverse impacts from the disturbance of contaminated soil is discussed briefly in Section 3.4, Water Resources and Water Quality and more extensively in Section 3.7, Hazardous Material and Human Health.

4.4 Water Resources and Water Quality

4.4.1 Affected Environment

4.4.1.1 Surface Water

The project area is within the Womens Bay-Frontal Chiniak Bay subwatershed (hydrologic unit code 190207011502), which includes Sargent Creek, Russian Creek, and Salonie Creek, among others. This watershed ultimately drains out to the ocean through Womens Bay into Chiniak Bay, north and east of the project area, and can therefore affect local marine water quality conditions. Limited information is available on existing surface water quality conditions in the project area. Women's Bay is classified as Category 3, "Waterbodies where

data or information is insufficient to determine if the [water quality standards] for any criteria are attained,” by ADEC (2018).

Base Kodiak’s drinking water supply is from Buskin Lake, approximately 3.5 miles from the project area. The lake and treatment facility are upstream of the project area and would not be affected by any actions associated with the proposed alternatives; therefore, the lake and treatment facility are not discussed further in this EA.

The following characterization of surface water conditions in the project area is excerpted from the USCG’s *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010). Supplemental information specific to the proposed project is enclosed by brackets.

“Historic sources of water contaminants on Nyman Peninsula include fuel and drum storage sites. Site-specific sampling on the peninsula was undertaken by Glass et al. (1989). Contaminants with levels at or above maximum contaminant level goals (concentration of a drinking water contaminant below which there is no known or expected risk to public health) included lead, benzene, chloroform, 1-2-dichloroethene, methylenechloride, and polychlorinated biphenyls. [Sampling sites 41 and 50 were located near the seawater intake and at the Marginal Wharf, respectively.] No contaminants were found with concentrations above maximum contaminant levels (maximum allowable level of a contaminant in drinking water that is delivered to any user of a public water system)...

Additional potential sources of pollution that could affect water resources on Nyman Peninsula include the following:

- Activities at the Hazardous Waste Storage Building (fuels, perchloroethene, metals, and other solvents);
- Industrial activities (fuels, metals, and solvents); and
- Water transportation activities (bilge water, sewage, fuels, lubricants, paints, grinding/sanding debris, and materials and wastes being loaded and unloaded from vessels).”

4.4.1.2 Groundwater

The following characterization of the groundwater conditions in the project area is excerpted from the USCG’s *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

“The bedrock underlying the majority of Kodiak Island is composed of metamorphosed sedimentary and volcanic rocks and is almost impermeable,

allowing little groundwater movement (Hogan and Nakanishi 1995). However, secondary fracturing in the bedrock in the vicinity of BSU Kodiak may allow water flow (Brown 1989). Groundwater recharge in the vicinity is primarily due to precipitation infiltrating from the surface. Water elevations in wells measured in 1988 and 1989 ranged from 0.3 to 2.0 feet below the ground surface during periods of heavy precipitation, while water levels dropped to 4.9 to 40 feet below the ground surface during dry spells (Hogan and Nakanishi 1995). Groundwater on Kodiak Island travels through a number of pathways to streams, rivers, springs, and seeps and to the atmosphere. The general direction of groundwater flow is towards St. Paul Harbor to the east and toward the Buskin River to the north (Hogan and Nakanishi 1995).

Groundwater quality in the project area can affect the quality of surface water. Glass (1996) sampled groundwater on Nyman Peninsula and detected contaminants with concentrations above maximum contaminant level goals, including arsenic, chloroform, 1,2-dichloroethane, and methylene chloride.

Several contaminants were also detected with concentrations above maximum contaminant levels, including lead, cadmium, benzene, tetrachloroethene, trichloroethene, and vinyl chloride.

The only groundwater source that is used by BSU Kodiak is for a recreational beach house owned and operated by the USCG 0.2 mile north of the mouth of the Buskin River. The water supply well for the beach house is over 100 feet deep.”

4.4.1.3 Stormwater and Wastewater Drainage

The following general characterization of the stormwater and wastewater drainage system of the USCG Kodiak Base is excerpted from USCG’s *Environmental Assessment*:

Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska (2010):

“Coast Guard operations are subject to federal permits that regulate general storm water runoff, runoff associated with fuel storage facilities, and effluent from the wastewater treatment plant. The area surrounding BSU Kodiak is extensively developed, and drainage is directed by ditches, culverts, and storm-sewer lines. Storm water discharge is regulated by the [Alaska Pollutant Discharge Elimination System (APDES)] in compliance with the Clean Water Act (CWA). The closest facilities with [APDES]-regulated discharges outside of the base are over two miles away. Because BSU Kodiak is the largest development in the area, its activities have the largest human influence on marine water quality in the area. BSU Kodiak operates under the following three [APDES] permits:

- A general storm water run-off permit;
- A permit for storm water run-off from the bulk fuel storage facilities; and
- A permit for effluent from the wastewater treatment plant.”

Neither the seawater intake structure nor the Marginal Wharf contribute stormwater runoff into the USCG’s collection or treatment system. All runoff is shed directly from the surface of the structures into Inner Womens Bay.

Bulk Fuel Facility

Through Permit AK-0031429, the ADEC authorized USCG Kodiak to discharge treated stormwater associated with the bulk fuel facilities into Women’s Bay and St. Paul Harbor. The permit is recurrent with minor modifications and was most recently re-issued in February 2020. Centrally located on Nyman Peninsula, the bulk petroleum fuel terminal stores 5.6 million gallons of petroleum fuel in aboveground storage tanks (ASTs) for distribution to Coast Guard cutters and aircrafts. Four outfalls discharging to either Womens Bay or St. Paul Harbor are associated with these facilities: NP-1 (Womens Bay), IA-3 (St. Paul Harbor), NP-18 (St. Paul Harbor), and NP-6 (Womens Bay). Marc Bentley, an Environmental Specialist at ADEC, stated that although a number of monitored outfall locations had exceedances of pH and total organic carbon (TOC), no enforcement action was taken (pers. comm., November 5, 2019). The recently issued permit includes additional BMPs that address pH and TOC at the non-compliant outfalls and requirements for aqueous firefighting foam.

Wastewater Treatment Plant Discharge

Under Permit AK0020648, the ADEC authorized USCG Kodiak to discharge wastewater effluent into St. Paul Harbor via a 20-inch-diameter pipe that extends more than 1,000 feet offshore. The permit is recurrent with minor modifications. The permit was most recently re-issued on January 27, 2017 and is set to expire at midnight on February 28, 2022. The permit includes a chronic mixing zone for ammonia, copper, whole effluent toxicity, temperature and zinc and an acute mixing zone for copper, ammonia and zinc, each with defined boundaries. The site has had a history of exceedances; however, formal enforcement action was not taken. According to Marc Bentley, there has been no record of continued exceedances since the employment of additional ADEC-approved BMPs (pers. comm., November 5, 2019).

4.4.1.4 Wetlands and Other Waters of the United States

Marginal Wharf and the seawater intake structures are located below the high tide line of Inner Womens Bay, which is a navigable water of the United States regulated by the USACE

under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act (see Section 2.2.4.6). Inner Womens Bay around these structures has also been mapped by USFWS in its National Wetlands Inventory as an estuarine and marine deepwater habitat, specifically coded as M1UBL or marine, subtidal, unconsolidated bottom (USFWS, 2020b). Subtidal describes areas where the substrate is “continuously covered with tidal water (i.e., located below extreme low water).” An unconsolidated bottom is an area with “at least 25% cover of particles smaller than stones (less than 6-7 cm), and a vegetative cover less than 30%.”

The seawater intake structures are not located below extreme low water; the upper pile cap is located at mean high water (approximately 7 feet North American Vertical Datum of 1988 [NAVD88]) and the seawater intake is located at approximately 4 feet NAVD88. The substrate below the Marginal Wharf is generally several feet below mean lower low water. The USFWS characterization of low vegetative cover and particle sizes, however, is a good approximation. According to Chris Long (pers. comm., 21 January 2020), there is submerged aquatic vegetation on the waterward side of the wharf and some kelp between the shore and the landward side of the wharf. Vegetation growth below the pier is limited by reduced light. The substrate was also characterized as rocky in the nearshore (along the riprap bank) grading to shells over mud beneath the pier (Long, pers. comm., January 21, 2020).

The alternatives will not affect any adjacent areas above the high tide line, so a wetland delineation was not conducted.

4.4.1.5 Floodplains and Flood Hazards

The following characterization of floodplains and flood hazards of Kodiak Island is excerpted from USCG’s *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

“Floodplains are low-relief valley bottom lands created by periodic river flooding. The spatial extent of a floodplain is frequently described in terms of statistical flood frequency. The 100-year floodplain is land that has a 1 percent chance of flooding each year. There are no Federal Emergency Management Agency 100-year floodplain maps for the project area. The project area is located outside of the predicted floodplain for Buskin River. The most likely flood hazards relate to the proximity of the project area to the bay, making it potentially susceptible to storm-related wave run-up or seismic activity (tsunamis). During the 1964 Alaska earthquake, tsunami-created waves of 6.1 meters were recorded in the vicinity of the project area (NOAA 2009h). As a result of this earthquake, the peninsula was

lowered by six feet, making the project area susceptible to flooding by storm-driven waves and storm surges at high tide.”

4.4.2 Environmental Consequences

4.4.2.1 No Action

Under the No Action Alternative, the derelict structures would remain and no demolition activities would occur. Minor adverse impacts to water quality would result from continued introduction of hazardous materials into the aquatic environment by degrading artificial structures.

4.4.2.2 Proposed Action

Surface and Groundwater Quality

The Proposed Action would have minor adverse impacts on local water quality during demolition of existing structures in Inner Womens Bay. These impacts would be temporary and short term and could include the following:

- Increased localized turbidity levels associated with disturbance of sediments during pile removal at Marginal Wharf. Disturbance of sediments could mobilize bound contaminants (see Section 3.7);
- Short term and localized increase in pH associated with concrete cutting of the seawater intake structures. Rapid dilution to background levels is anticipated;
- Minor increase in turbidity during placement of approximately 6 cubic yards of crushed gravel in the void left by demolition of the seawater intake; and
- Minor increase in risk of fuel and oil spills into Inner Womens Bay from the barge, work boat, and/or other equipment used during demolition.

The USCG’s standard contract provisions for construction projects require use of BMPs such as those listed in Section 2.2.3 that support avoidance and minimization of potential adverse effects on water quality.

Prior to project commencement, the sediments at Marginal Wharf will be sampled and tested for petroleum, PCBs, and polycyclic aromatic hydrocarbons (PAHs). The Proposed Action would have minor adverse impacts on water quality if pile removal disturbed contaminated marine sediments. As indicated in Section 2.2.3, pile removal methods will minimize turbidity and use of a turbidity curtain will minimize the area of turbidity and support more rapid settling of sediments out of the column and back onto the substrate. Sampling results will determine final disposal of any sediments that are captured with the removed pile on the barge deck. All activities would conform to state and federal water

quality standards. Further analysis of the impacts of the alternatives on site contamination and human health is contained in Section 3.7, Hazardous Material and Human Health.

Groundwater resources would not be affected by the Proposed Action.

Stormwater and Wastewater Drainage

The Proposed Action would remove over-water impervious surfaces that are currently briefly intercepting precipitation that would otherwise fall directly into Inner Womens Bay. No activity would occur within uplands above the high tide line that would modify or affect current stormwater runoff pathways or change the type or quantity of pollutants within runoff. The Proposed Action would not result in any impacts on stormwater or wastewater drainage.

Wetlands and Other Waters of the United States

The Proposed Action would take place within the waters of Inner Womens Bay, but would not disturb submerged aquatic vegetation rooted in the substrate or adversely affect aquatic substrates in the long term. Short-term disruption of the substrate would result during pile removal, and a fine layer of suspended sediment may settle on the bottom after removal has been completed. The re-settled sediment is not anticipated to degrade the aquatic habitat or adversely affect aquatic life.

The USCG's standard contract provisions for construction projects require use of BMPs such as those listed in Section 2.2.3 that support avoidance and minimization of potential adverse effects on wetlands and other waters of the United States.

Floodplains and Flood Hazards

The Proposed Action would have no significant adverse impacts on floodplains or flood hazard risk. The structures are no longer functional and provide little benefit in protecting the shoreline from storm surge considering either their small size (seawater intake and pile caps) or degraded condition (Marginal Wharf).

4.5 Biological Resources

4.5.1 Affected Environment

This section describes biological resources in the project area, with special attention focused on federally listed, regulated or managed species and habitats. A typical community of barnacles, mussels, starfish, and other aquatic life were observed on the piles. None of these species have special protections under state or federal law, they are not a unique food source or habitat for special status species, and they are abundant in Inner Womens Bay.

4.5.1.1 Federally Listed Species and Critical Habitat

Species listed under the federal ESA are managed by either the USFWS or NOAA Fisheries. After consulting local representatives of these agencies, obtaining a formal species list from the USFWS (July 7, 2020), and considering the life history and habitats of potential species, Exhibit 3.5-1 identifies those species that may be present within the areas directly or indirectly affected by the projects.

Exhibit 3.5-1: USFWS and NOAA Fisheries Listed Species and Critical Habitats Potentially in the Action Area

Species Name <i>Scientific Name</i>	Species		Critical Habitat	
	Management Unit	Federal Status	Status	Present in Action Area
Class: Mammalia				
Humpback Whale <i>Megaptera novaeangliae</i>	Western North Pacific DPS/Mexico DPS	Endangered/ Threatened	Final Designation	Yes
Northern Sea Otter <i>Enhydra lutris kenyoni</i>	Southwest Alaska DPS	Threatened	Final Designation	Yes
Steller Sea Lion <i>Eumetopias jubatus</i> ,	Western	Endangered	Final Designation	Yes
Class: Aves				
Steller's Eider <i>Polysticta stelleri</i>	Alaska Breeding Population	Threatened	Final Designation	No

NOTE:

DPS = distinct population segment

NOAA Fisheries Species Distribution Mapper (2019) also included the fin whale, North Pacific right whale, sperm whale, and grey whale, and the USFWS species list also included the short-tailed albatross. However, these four listed whales are not known to frequent the waters in or near Inner Womens Bay or the action area. The albatross is similarly unlikely to be found in Inner Womens Bay based on lack of observation, location of breeding areas, and feeding behaviors and habitat. In the extremely unlikely event that these species are observed near the Project sites, demolition activity would be halted if they approach the 940-meter exclusion zone. These species will not be discussed further in this EA.

Humpback Whale

Humpback whales are large whales that migrate long distances from their southern winter breeding grounds to feeding grounds in the Northern Hemisphere. Two distinct population segments (DPSs) use the GOA for foraging, the Mexico DPS is listed as threatened under the ESA and the Western North Pacific DPS listed as endangered under the ESA. According to ADF&G, humpback whales feed in the waters around the Aleutian Islands and can routinely be spotted near the Barren Islands between the north end of Kodiak Island and

Homer (ADF&G, 2019). Aerial surveys conducted between 1999 and 2005 for Sea Grant Gulf Apex Predator-Prey Project, and the *Summer Distribution and Habitat Characteristics of Balaenopterid Whales In Steller Sea Lion Critical Habitat, Northeast Kodiak Island* study indicate that humpback whales are found all along the eastern coast of the Kodiak Archipelago, including areas just outside of Womens Bay in Chiniak Bay with the highest concentrations near Ugak Bay peaking in August (Baraff and others, 2005; Sea Grant Alaska, 2012). Unlike many other species of whale, humpback whales often feed in shallower waters closer to the coastline (NOAA Fisheries, 2021).

Critical habitat for the Mexico and Western North Pacific DPS has been designated in marine waters off the California, Oregon, Washington, and Alaska, including Inner Womens Bay (NOAA Fisheries, 2021). The designated areas are “seasonal feeding areas for humpback whales and contain the essential prey feature” (e.g., krill, capelin, juvenile pollock, sand lance).

Northern Sea Otter

The southwestern Alaska distinct population of northern sea otters, with a range from the Aleutian Islands to Lower Cook Inlet including the Kodiak Archipelago, was listed as threatened under the ESA in 2005 due to declining populations (Cobb, 2018).

Northern sea otters are most commonly observed at and landward of the 12.2-foot-depth contour because of their reliance on benthic foraging habitat in subtidal and intertidal zones (USFWS, 2014). Locations sheltered from wave action including inlets and bays, provide important feeding and resting areas (Sato, 2018). Sea otter diet consists of a variety of marine invertebrates including clams, mussels, crabs, and sea urchins; resources that are found in abundance around Kodiak Island, including within Womens Bay (Cobb, 2018; Sato, 2018). Aerial surveys conducted in 2014 estimated a total of 13,274 sea otters inhabiting the waters around the Kodiak Archipelago, with group sizes of 68 to 159 observed in Womens Bay (Cobb, 2018). The USCG has conducted several in-water projects similar to the proposed Project that required marine mammal monitoring. Marine mammal observations during one such project, Women’s Bay Cargo Wharf and Fuel Pier Repair, demonstrated that sea otters found in Inner Womens Bay appear to be habituated to construction activities and noises. Otters were often seen coming into the exclusion zone to forage without appearing to be impacted. This occurred often enough that the impact zone was significantly decreased, with authorization from USFWS, to allow for work to continue.

Northern sea otter critical habitat was designated in 2009 and includes areas around Kodiak Island within the 20-meter depth contour and/or the 100-meter nearshore zone (NOAA Fisheries, 2009). Inner Womens Bay is included within designated critical habitat (NOAA Fisheries, 2009).

Steller Sea Lion

Steller sea lions utilize nearshore marine habitat and may be present in the vicinity of the project during construction. An artificial haulout that is not part of the species' critical habitat designation is also located in Dog Bay, more than 4 miles to the northeast. This haulout is an old section of a floating breakwater (National Marine Fisheries Service, 2015). According to NOAA Fisheries (2015), "*WDPS Steller sea lions frequently occur in Kodiak Harbor... Many individual sea lions have become habituated to human activity in the Kodiak harbor/port area...*" Most of this activity is associated with fishing vessels and seafood processing facilities. Inner Womens Bay near the project areas only contains vessels associated with the USCG, commercial container operations on the northwest side of Inner Womens Bay, and recreational fisheries, and the upland areas are occupied by the USCG's airfield and related facilities. These uses are unlikely to attract sea lions. However, the Comprehensive Plan for the Womens Bay community notes that sea lions inhabit the bay (Kodiak Island Borough and others, 2006). Other sources indicate that Womens Bay is very productive, which suggests that sea lion prey may be abundant (e.g., Ryer and Copeman, 2012; Long and others, 2012).

The site is designated as critical habitat because it is within 20 nautical miles (23 miles) of a major rookery and two major haulouts. The nearest designated sea lion haulout sites have been identified more than 9 miles to the northeast and more than 15 miles to the southeast (NOAA Fisheries, 2019). No known haulouts are located within the project area. The nearest rookery is also more than 9 miles to the northeast.

Steller's Eider

Steller's eiders may only be found in the Kodiak Archipelago area during the non-breeding wintering period associated with shallow (< 30 feet) waters (USFWS, 2002). According to telemetry studies conducted by the ADF&G (Rosenberg and others, 2016), eiders arrive in Womens Bay starting in November, and leave Womens Bay by the middle to end of April. Many sightings in Womens Bay have been reported on eBird (e.g., March 2011, April 2013, February 2015, March 2016, and February 2019) (eBird, 2020). The 2019 sighting was in approximately the same location of Womens Bay as the project area. Steller's eiders are highly social during non-breeding times and often occur in larger flocks during the winter months. They are known for their synchronous diving, feeding primarily on crustaceans, marine worms, gastropods, and mollusks (Fredrickson, 2001). Studies have shown the Steller's eider have a strong fidelity to wintering grounds and will return to the same location for multiple years (Fredrickson, 2001).

There is no critical habitat within the project area; the nearest designated critical habitat is more than 340 miles to the southwest.

4.5.1.2 Essential Fish Habitat (EFH)

The Magnuson-Stevens Act mandates that NOAA Fisheries must identify EFH for all federally managed marine fish. Federal agencies are required to consult with NOAA Fisheries on all activities, or proposed activities, authorized, funded, or undertaken by the agency that may adversely affect EFH. The NPFMC has designated EFH for two FMPs that include the project area: GOA Groundfish FMP and the Salmon Fisheries in the EEZ off the Coast of Alaska FMP (NPFMC, 2018 and 2019).

Groundfish

The GOA Groundfish FMP includes fisheries for all stocks of finfish (except for salmon, steelhead, Pacific halibut, Pacific herring, and tuna) in the GOA, extending the width of the EEZ in the North Pacific Ocean, exclusive of the Bering Sea, between the eastern Aleutian Islands at 170°E W (NPFMC, 2019). The FMP addresses 27 specific species (e.g., Pacific cod, Alaska plaice, and flathead sole) or groups of species (e.g., skates, squids, and octopus). To the extent information is available, the GOA Groundfish FMP describes the following life stages for each covered species: eggs, larvae, early juveniles, late juveniles, and adults. Based on a review of NOAA Fisheries' EFH Mapper (2020), many of the identified groundfish (almost all the 38 mapped species or species groups) have EFH for one or more life stages within 1,000 feet of the project. However, the project sites are not mapped as EFH for those species included in the EFH Mapper (NOAA Fisheries, 2020).

Salmon

The Salmon Fisheries in the EEZ off the Coast of Alaska FMP includes five salmonid species: pink salmon, chum salmon, coho salmon, Chinook salmon, and sockeye salmon. EFH includes those "waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" (NPFMC, 2018). The salmon FMP describes EFH for all five salmonid species for the following life stages: freshwater eggs and larvae, freshwater juveniles, estuarine juveniles, marine juveniles, marine immature and maturing adults, and freshwater adults (NPFMC, 2018). Based on a review of NOAA Fisheries' EFH Mapper (2020), Inner Womens Bay and the project sites have mapped salmon EFH for all the designated salmon. Salmon within Inner Womens Bay near the project sites could be either marine juveniles (smolts) that have recently transitioned from freshwater streams into estuarine and marine habitats or immature or maturing adults.

4.5.1.3 Marine Mammals

In addition to the listed marine mammals discussed in Section 3.5.1.1, the following marine mammals are identified in NOAA Fisheries online Species Distribution Mapper (2019) as having potential to occur within the project areas:

- Harbor seal (*Phoca vitulina*),
- Northern fur seal (*Callorhinus ursinus*),
- Dall's porpoise (*Phocoenoides dalli*),
- Harbor porpoise (*Phocoena phocoena*),
- Pacific white-sided dolphin (*Lagenorhynchus obliquidens*),
- Cuvier's beaked whale (*Ziphius cavirostris*),
- Killer whale (*Orcinus orca*), and
- Minke whale (*Balaenoptera acutorostrata*).

Of these species, harbor seal is the most likely to be observed in Inner Womens Bay based on habitat preferences, and was specifically mentioned in the Womens Bay Comprehensive Plan as an "occasional" visitor along with sea otters and sea lions (Kodiak Island Borough and others, 2006). The remaining species are typically found in deeper offshore waters; no reports of their presence in Inner Womens Bay have been located.

4.5.1.4 Migratory Birds

Many seabirds, waterfowl, songbirds, raptors, and other species are migratory and are protected under the MBTA. The following migratory birds are identified by USFWS as being "of particular concern either because they occur on the USFWS Birds of Conservation Concern list or warrant special attention in your project location," and are a subset of all migratory birds (USFWS, 2020c):

- | | |
|--|---|
| ▪ Aleutian tern (<i>Sterna aleutica</i>) | ▪ Double-crested cormorant (<i>Phalacrocorax auritus</i>) |
| ▪ Arctic tern (<i>Sterna paradisaea</i>) | ▪ Dunlin (<i>Calidris alpine arctica</i>) |
| ▪ Bald eagle (<i>Haliaeetus leucocephalus</i>) | ▪ Golden eagle (<i>Aquila chrysaetos</i>) |
| ▪ Black oystercatcher (<i>Haematopus bachmani</i>) | ▪ Herring gull (<i>Larus argentatus</i>) |
| ▪ Black scoter (<i>Melanitta nigra</i>) | ▪ Lesser yellowlegs (<i>Tringa flavipes</i>) |
| ▪ Black turnstone (<i>Arenaria melanocephala</i>) | ▪ Long-tailed duck (<i>Clangula hyemalis</i>) |
| ▪ Black-legged kittiwake (<i>Rissa tridactyla</i>) | ▪ Pacific golden-plover (<i>Pluvialis fulva</i>) |
| ▪ Common eider (<i>Somateria mollissima</i>) | ▪ Parasitic jaeger (<i>Stercorarius parasiticus</i>) |
| ▪ Common loon (<i>Gavia immer</i>) | ▪ Red-breasted merganser (<i>Mergus serrator</i>) |
| ▪ Common murre (<i>Uria aalge</i>) | ▪ Red-faced cormorant (<i>Phalacrocorax urile</i>) |

- Red-throated loon (*Gavia stellata*)
- Ring-billed gull (*Larus delawarensis*)
- Surf scoter (*Melanitta perspicillata*)
- Whimbrel (*Numenius phaeopus*)
- White-winged scoter (*Melanitta fusca*)
- Yellow-billed loon (*Gavia adamsii*).

As recently as the summer of 2020, a colony of glaucous-winged gulls was documented nesting on the deck of the Marginal Wharf; potential nesting activity by several pairs of black oystercatcher, horned puffin, and pigeon guillemot was also observed (eBird, 2021). Nesting activity on the seawater intake structure is unknown.

Exhibit 3.5-2: Breeding Season of Migratory Birds Known or With Potential Nesting on Marginal Wharf

Species	Months											
	J	F	M	A	M	J	J	A	S	O	N	D
Glaucous-winged gull ¹					X	X	X	X				
Black oystercatcher ²		X	X	X	X	X	X					
Horned puffin ²					X	X	X	X	X			
Pigeon guillemot ²				X	X	X	X	X	X			
All Species: General		X	X	X	X	X	X	X	X			

NOTES:

3 Active nesting was observed and documented in eBird.

4 Birds presumed to nest on Marginal Wharf; however, no documentation of active nests was located.

Sources: ADF&G, 2008; Audubon Society, 2019; Hardin, 2014; Michaud, 2019.

4.5.1.5 Other Fish and Wildlife

Under the Fish and Wildlife Coordination Act, NOAA Fisheries has the authority to make recommendations to conserve GOA crab, which do not have established EFH, but are nevertheless important NOAA trust resources. In the project area, these species include red king crab and Tanner crab. The closest designated EFH for king crabs and Tanner crabs is in the Aleutian Islands and Bering Sea.

Red King Crab

The waters around Kodiak Island were once the world's largest red king crab fishery, with harvest peaking in 1965 followed by a population drop and stabilization and culminating in a final collapse in the early 1980s (Bechtol and Kruse, 2009). Continued low abundance has kept the Kodiak red king crab closed to commercial fishing since 1983. Bechtol and Kruse's study attributes the collapse at least partially to overharvest by sheer numbers and preferential selection of male crabs, through the resulting changes in the male to female ratio in the remaining population, and to possible climate changes that may have increased predation by cod.

A report by National Marine Fisheries Service (Dew, 1991) examined habitat preferences of juvenile red king crab in three bays of Kodiak Island, including Inner Womens Bay. Marginal Wharf was one of the study sites in Inner Womens Bay. Of the three bays, Inner Womens Bay had the highest density of Age 0-1 and Age 2-4 crabs, and Marginal Wharf had the most preferred habitat of three types examined in Inner Womens Bay (Dew, 1991). Historically, Marginal Wharf and other piers in Inner Womens Bay have been utilized by 1- to 2-year-old red king crabs which aggregate on piles in large groups called pods (Exhibit 3.5-3). The pods were typically found on piles between 6 and 12 feet from the bottom. The data indicate the vertical structure is an important component of habitat for Age 1-2 crabs as part of predator avoidance; Age 0 crab are able to shelter from predators in the “interstices of the broken-shell and debris-strewn bottom” or tucked amongst sea stars and so do not need to expend the energy moving up and down piles (Dew, 1991). Of individual Age 1-2 crabs (not in pods) observed at the wharf, 56% were on piles, 37% were on the bottom, and 7% were on other man-made debris (Dew, 1991).



Exhibit 3.5-3: Red King Crab Pod on Marginal Wharf in 2010 (Photo by Pete Cummiskey, NOAA Fisheries)

A study of podding behaviors in Inner Womens Bay (Dew, 1990) also indicates that other structures and debris, such as a light hood that had fallen from the wharf (approximately 600 crab for 10 consecutive days), have been used by podding crabs. One of the two pods that was studied for 78 consecutive days spent 28 of those days below Marginal Wharf and 35 days in the Nyman Peninsula habitat, whose only vertical structure other than kelp and other macrophytes, was cobble (Dew, 1990). Other structures under the Marginal Wharf that could provide podding sites include old barrels and steel drums, utility-related boxes, wire spools, fallen wharf decking, and fallen or broken piles.

The Dew studies were completed almost 30 years ago. According to Dr. Chris Long, a Research Ecologist/Research Fishery Biologist at NOAA’s Kodiak Alaska Fishery Science Center, dive studies have continued to be conducted at the site although the data has not been published. He noted that the Kodiak region now has only a “remnant population” of red king crab and that there have been no indications of a population increase. Crab observations at Marginal Wharf were “remarkably few” about 11 years ago (Long, pers. comm., January 16, 2020). He stated that the crab could still be found at the wharf five to seven years ago, but not in the same numbers as previous years (Long, pers. comm., January 21, 2020).

Specific information about use by crab of the seawater intake structures was not located. At mean high water, only 3 feet of the intake structure is below water. Significant use by crabs is not expected.

Tanner Crab

Tanner crab have an active commercial fishery on Kodiak Island. Similar to the red king crab, Tanner crabs experienced a decline in the 1980s and the Kodiak fishery was closed in 1995. The fishery was reopened in 2000 provided that certain criteria are met each year (Stichert, 2012). The depths at which they are found are highly variable, with some association between age and sex. Juveniles tend to be in shallower waters (50 to 165 meters), and all ages are associated with sand, mud or shell bottoms with low densities in habitats with debris. Female adults are known to partially bury themselves in these substrates, and adult males and juveniles are also suspected of burying (Krause and others, 2001). None of the studies showed an association with structures such as piles. The study by Dew (1991) was not focused on the Tanner crab, but it mentions that the “mid-bay habitat” of Inner Womens Bay was “characterized by silt, brown algal mat, tanner crab...” and also indicated Tanner crab are present at Marginal Wharf. Dr. Long confirmed Tanner crab use of the area, limited to the substrate (pers. comm., July 17, 2020).

4.5.2 Environmental Consequences

Effects on biological resources would be considered significant if project-related actions were to result in the temporary or permanent loss of any sensitive or protected habitat or in the direct loss or damage of any sensitive resource. Effects would also be considered significant if the action were to violate the ESA; Marine Mammal Protection Act; Fish and Wildlife Coordination Act; Magnuson-Stevens Fishery Conservation and Management Act; Clean Water Act; MBTA; or other federal, state, or local laws protecting biological resources.

4.5.2.1 No Action

Retention of the existing structures under the No Action Alternative would not introduce any new short-term or long-term adverse effects on federally listed species, proposed or designated critical habitat, marine mammals, migratory birds, or other sensitive fish and wildlife species. In time, over-water components of the Marginal Wharf currently used for nesting by a number of migratory bird species will be eliminated as the structure continues to degrade. However, the continued presence of Marginal Wharf’s contaminated piles, which are a substrate for populations of invertebrates fed on by northern sea otters and other wildlife, may be resulting in introduction of hazardous materials into foraging wildlife’s digestive tracts, thereby potentially causing harm.

4.5.2.2 Proposed Action

As mentioned above, barnacles, mussels, starfish, and other aquatic life were observed on the Marginal Wharf piles. None of these species have special protections under state or federal law, they are not a unique food source or habitat for special status species, and they are abundant in Inner Womens Bay. Loss of these species as part of the demolition project is therefore not significant and will not be addressed further in this EA.

Federally Listed Species and Critical Habitat

Based on the confirmed occurrence within the action area, the Proposed Action has the potential to effect northern sea otter, Steller's sea lion, humpback whale, and Steller's eider. A brief impact assessment and proposed impact determinations based on Section 7 ESA analysis from the BA are provided below for each species. In general, the habitat preferences of the humpback whale and the use of monitors following the protocol that requires work to shut down when any of the listed species enter their respective exclusion zones, limits potential impacts to less than significant levels. The primary vector for potential impacts to these species is through generation of in-air and in-water noise in excess of ambient levels.

A BA was prepared and submitted to USFWS and NOAA Fisheries on February 24, 2021. NOAA Fisheries provided the USCG with updated marine mammal monitoring and mitigation measures on March 9. After USCG confirmation that those measures would be incorporated into the project, NOAA Fisheries issued its concurrence on March 26, 2021. USFWS issued its concurrence on April 19, 2021.

Steller's Eider. The Steller's eider is only present on Kodiak Island during the winter months (September 15 to April 1) and therefore construction activities during the summer months would have no impact on Steller's eider. Winter construction would have a less than significant impact on Steller's eider. If construction activities were to occur during the winter months (September 15 to April 1), measures described in Section 2.2.3.5 would be implemented to avoid incidental take of the Steller's eider.

On April 19, 2021, USFWS concurred, pursuant to Section 7, that the Proposed Action May Affect, but is not Likely to Adversely Affect, Steller's eider.

Northern Sea Otter. The Proposed Action would have less than significant impacts on northern sea otter. The sea otter has been occasionally observed around the Cargo Wharf in recent years; however, measures described in Section 2.2.3.4 would be undertaken to ensure that demolition activities would not result in incidental take of the northern sea otter.

On April 19, 2021, USFWS concurred, pursuant to Section 7, that the Proposed Action May Affect, but is not Likely to Adversely Affect, the northern sea otter.

The Marginal Wharf and seawater intake structures are generally within designated critical habitat for the sea otter. Critical habitat includes five primary constituent elements, one of which is “Food, water, air, light, minerals, or other nutritional or physiological requirements.” Removal of the Marginal Wharf piles will remove existing otter prey items and attachment site for future prey items. However, while the waters and substrate of Inner Womens Bay may be critical habitat, the critical habitat designation specifically excludes “developed areas, such as piers, docks, harbors, marinas, jetties, and breakwaters.” Therefore, the Marginal Wharf and seawater intake structures are not critical habitat.

On April 19, 2021, USFWS concurred, pursuant to Section 7, that the Proposed Action May Affect, but is not Likely to Adversely Affect, northern sea otter critical habitat.

Steller Sea Lion (WDPS). The Proposed Action would have less than significant impacts on Steller sea lion. While Steller sea lions have been occasionally observed around the Cargo Wharf in recent years, and have been observed in Womens Bay by NOAA Fisheries biologists diving at the Marginal Wharf, measures described in Section 2.2.3.4 would be undertaken to ensure that demolition activities would not result in incidental take of sea lions.

On March 26, 2021, NOAA Fisheries concurred, pursuant to Section 7 of the ESA, that the Proposed Action May Affect, but is not Likely to Adversely Affect, the Steller sea lion.

Humpback Whale. The Proposed Action would have less than significant impacts on the humpback whale. Humpback whales may be present in the greater Kodiak area seasonally or sporadically, although no reports of whales in Inner Womens Bay have been located. Project activities would comply with measures described in Section 2.2.3.4, specifically shut down of demolition if a whale is observed in the exclusion zone, to prevent incidental take of humpback whales.

On March 26, 2021, NOAA Fisheries concurred, pursuant to Section 7 of the ESA, that the proposed project May Affect, but is not Likely to Adversely Affect, the humpback whale.

The Proposed Action would not affect production of essential prey or interfere with any seasonal feeding or adversely modify a potential seasonal feeding area. As previously noted, project activities will cease when the whale enters the exclusion zone.

On March 26, 2021, NOAA Fisheries concurred, pursuant to Section 7 of the ESA, that the Proposed Action will not adversely modify or destroy proposed or designated critical habitat.

Essential Fish Habitat (EFH)

The Project will result in a temporary impact to water quality within Inner Womens Bay, which includes components of the GOA Groundfish and Salmon EFH. However, the impact to water quality will be short term and BMPs will be implemented to minimize the effect to EFH until demolition activities are complete. Piles, artificial over-water cover, and concrete structures are not elements of “waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity” that constitute EFH.

On March 26, 2021, NOAA Fisheries concurred that no permanent adverse effect on EFH for GOA Groundfish and Salmon, or their prey species, will result from the Proposed Action.

Marine Mammals

The Proposed Action would have no significant adverse effect on marine mammals. Conservation measures and practices described in Section 2.2.3 would reduce potential impacts on marine mammals during construction. Specifically, the USCG will be complying with shutdown requirements when marine mammals approach the boundary of their respective exclusion zones as approved by NOAA Fisheries and the USFWS in their respective ESA concurrence letters (Appendix B).

The BA prepared for the Proposed Action to address effects on species regulated by the ESA and the Magnuson-Stevens Fishery Conservation and Management Act also addressed several species protected under the Marine Mammal Protection Act. The USCG determined No Effect on non-listed species protected under the Marine Mammal Protection Act.

Migratory Birds

The Proposed Action is not likely to take migratory birds through direct physical harm of adult or juvenile birds as a result of the demolition activities. The Marginal Wharf provides confirmed and potential nesting habitat for several species of seabirds, including glaucous-winged gulls, black oystercatcher, horned puffin, and pigeon guillemot (eBird, 2021). If any nests are confirmed during pre-construction surveys on the Marginal Wharf or seawater intake structures prior to construction, work would be delayed within the established buffer until the birds have fledged. Any migratory birds flying over the project would also not be harmed.

A long-term impact of the Proposed Action is the permanent removal of nesting habitat provided by the Marginal Wharf and possibly the seawater intake. However, the surrounding areas on Kodiak Island provide ample nesting habitat and there are over 100 established seabird colonies located along the eastern half of the Kodiak Archipelago, several of which are within 4 miles of the proposed site (Corcoran, 2013). These colonies could provide nesting opportunities for birds displaced by the removal of the structures. As mentioned in Section 3.5.2.1, if no action were taken, the continued deterioration of the Marginal Wharf would eventually result in a similar outcome since the structures would naturally cease to provide suitable nesting habitat over time.

Other Fish and Wildlife

Red king crab. As described in Section 3.5.1.5, the piles of Marginal Wharf are a known habitat for juvenile red king crab and were preferred by Age 1-2 crab. However, as noted by Dr. Long, the population of red king crab in the Kodiak region in general is now a “remnant” and juvenile use at Marginal Wharf specifically has continued to decline. The data suggests that while piles may be preferred habitat when available, other vertical structure and debris are also utilized.

If juvenile red king crabs are present on the piles during demolition of Marginal Wharf, some may be harmed if they remain attached to the pile and are placed on the barge for disposal. However, the vibration of the pile and subsequent removal from the water are likely to cause the older and podding crabs to rapidly abandon the pile and seek refuge in other debris in the area (Long, pers. comm., July 20, 2020). After the Marginal Wharf is removed, pre-demolition piles that were broken and not visible to the equipment operators will remain, along with an abundance of fallen piles and other debris.

The loss of vertical piles and some expected juvenile crab mortality are an adverse effect, but are not considered significant based on the anticipated low numbers of crab using the wharf, the expected low mortality during demolition, and the retention of other natural and man-made debris and shorter vertical structures that can serve as juvenile crab habitat. The nearby fuel pier and cargo wharf facilities each have approximately 300 and 500 piles, respectively, that provide similar habitat.

Red king crab are not expected to be present on or affected by removal of the seawater intake structures.

Tanner crab. Removal of man-made structures of the Marginal Wharf and seawater intake will not degrade the soft-substrate habitats used by Tanner crab. BMPs outlined in Section 2.2.3 will minimize the intensity, extent, and duration of turbidity.

4.6 Land Use

4.6.1 Affected Environment

Base Kodiak is located at the northeast corner of Kodiak Island, south of the City of Kodiak, which is the major population center on the island. The lands, including the submerged lands of Inner Womens Bay, that eventually became Base Kodiak were acquired by the federal government in 1939 when construction for the Kodiak Navy Base began. Base Kodiak was established as a USCG facility in 1972 when the U.S. Navy ended their use of the facility, but a portion of the Base at the northeast end of Inner Womens Bay has hosted Air Station Kodiak since 1947. The long Nyman Peninsula divides Inner and Outer Womens Bays.

The peninsula and the inner shore host a number of waterfront and industrial uses that support current mission-related USCG operations, including the operational fuel pier and cargo wharf as well as the derelict Marginal Wharf and Building 624. North and east of the Air Station are other USCG facilities, including housing, commercial retail and recreational buildings, and office spaces. The Kodiak Airport wraps around these areas to the east and north. The airport is managed by Alaska's Department of Transportation and Public Facilities, but it is federally owned land that remains part of Base Kodiak.

There are several planning documents at different geographic and political scales that cover the proposed project areas. Each of these is described below.

4.6.1.1 Kodiak Island Borough Comprehensive Plan

The *Kodiak Island Borough Comprehensive Plan Update* (Kodiak Island Borough, 2008) shows a planned land use for most of BSU Kodiak of "Military Facility," including the uplands adjacent to Marginal Wharf and the seawater intake.

4.6.1.2 Kodiak Master Plan (U.S. Coast Guard [USCG])

A combined Master Plan and NEPA EA for Base Kodiak was approved by the USCG in 1996 (MAKERS, 1996). The Master Plan contained a series of recommendations "to maintain the operational efficiency and physical condition of [Base Kodiak] facilities." The Master Plan includes discussion of 13 recommended waterfront improvement projects, one of which is the demolition of Marginal Wharf. The Marginal Wharf demolition was the lowest priority project in the waterfront category. The Master Plan does not address the seawater intake structures.

The Master Plan describes the Marginal Wharf in 1996 as being in an "advanced state of deterioration" and reported that the structure no longer has any usable deck surface and has

been condemned. The Master Plan also states that the wharf “is awash at extreme high water.” The EA portion of the Master Plan document evaluated four alternatives to meet overall waterfront facility needs, two of which entirely demolished Marginal Wharf (Alternatives B and C) and two of which removed all of the decking and other structures but retained the piles for red king crab habitat (Alternatives A and D). The preferred alternative was Alternative A, although it was also noted that retaining the piles could present a navigational hazard that should be mitigated through marking the piles.

4.6.1.3 Waterfront Development Plan (USCG)

A Waterfront Development Plan was commissioned by the USCG to “address the current and future operational and support functionalities and identify the excesses and deficiencies to meet [Base Kodiak’s] waterfront requirements” (Michael Baker Jr., Inc., 2009). Similar to the 1996 Master Plan, this document does not refer to the seawater intake, but it does evaluate a number of alternatives for meeting USCG needs, including different options for handling Marginal Wharf. In this Master Plan, eight alternatives were evaluated, three of which included a Marginal Wharf element. Alternative 7, which included demolition of the old wharf and constructing a new Marginal Wharf, was selected as the preferred alternative. Alternative 7 was never implemented, however, as the USCG pursued a different strategy for upgrading the fuel pier.

4.6.1.4 Kodiak Area Plan (Alaska Department of Natural Resources [ADNR])

On December 20, 2004, the ADNR adopted the Kodiak Area Plan for State Lands (KAP). The KAP was established under state statute AS 38.04.005 to identify the intended purposes of designated land use units and establish land use management guidelines for those units.

According to the KAP, the Marginal Wharf and seawater intake project activities will occur within the Kodiak Tideland Unit KT-17, which extends from the tip of Nyman Peninsula northwest to the opposite shore and encompasses the waters of Inner Womens Bay to the Air Station. The intended uses and management of Unit KT-17 that are potentially applicable to the project areas include protecting heritage sites identified by the Alaska Heritage Resources Survey (AHRS), herring feeding and spawning areas in the vicinity, and nearby seabird colonies. This unit is identified by the AHRS as being near or in a prehistoric or historic heritage site (see discussion in Section 3.12 – Cultural and Historic Resources).

The USCG owns the entirety of Womens Bay, including KT-17 in Inner Womens Bay.

4.6.2 Environmental Consequences

Effects on land use would be considered significant if project-related actions substantially altered existing land uses or land use patterns or were inconsistent with applicable federal,

state, or local laws or land use plans. While projects by federal agencies on federal lands are generally exempt from compliance with local and state regulations, there are still federal planning directives to be consistent with local and state regulations and plans when feasible.

4.6.2.1 No Action

Under the No Action Alternative, the existing facilities would continue to degrade, posing risks to the environment, navigation, and human health and safety. No demolition or project construction would occur; therefore, there would be no project-driven changes in land use or land use patterns.

4.6.2.2 Proposed Action

The Proposed Action would have no land use impacts or be inconsistent with the most recent local or Base Kodiak land use plans. The existing structures no longer support any USCG operations and their removal would not interfere with achievement of any of the current land use plan objectives.

4.7 Hazardous Material and Human Health

Hazardous materials are known to be present on the Marginal Wharf and in the greater vicinity of the Nyman Peninsula. The USCG's Hazardous Materials Standards Division objectives include developing regulations, standards, and industry guidance and providing expertise and technical support to the USCG and other parties. The USCG continuously monitors its operations to find ways to minimize the use of hazardous materials and to reduce the generation of hazardous wastes.

This section describes the potential impacts of the hazardous materials present on the Marginal Wharf and seawater intake on the environment during the demolition and removal of the structures. Other hazards to human health and safety are also discussed.

4.7.1 Affected Environment

The USCG's *Draft Preliminary Assessment Report for SWMU 32 – Inner Womens Bay* (AECOM, 2019) describes historic uses and contaminated sites on adjacent properties on the Nyman Peninsula, which may have potential to have impacted the Inner Womens Bay, including the project area. Historic uses include industrial activities such as laundry, paint storage, power generation, container storage, fuel storage, and hazardous materials storage dating back to the 1940s. There are several Solid Waste Management Units (SWMUs) and Hazardous Waste Management Units (HWMUs) on the Nyman Peninsula. HWMUs that may have affected marine sediments include HWMU 3 (laundry facility), HWMU 6A (mogas), and HWMU 7A (barrel storage). SWMUs that may have affected marine

sediments include SWMU 6B (the fuel farm), SWMU 33 (empty container storage), and SWMU 10 (air station).

SWMU 32 (subtidal marine sediments) is a SWMU specifically for the Inner Womens Bay that received closure with no further action from the EPA and ADEC in 1999 (AECOM, 2019). Recently, additional investigations have determined that sediment concentrations of PCBs and carcinogenic PAHs are elevated above background levels within SWMU 32, but not to concentrations above “cleanup values established at similar Superfund sites and did not exceed ecological risk standards. However, available site-related data did not address possible bioaccumulation...” (AECOM, 2019). Potential chemical contamination within SWMU 32 may also include lead and mercury due to the breakdown of submerged munitions and explosives which may be present within the Inner Womens Bay (AECOM, 2019).

The Marginal Wharf and seawater intake structures contain known hazardous materials. The seawater intake contains observable creosote-treated timber on the exterior of the structure. ACM, including cement asbestos-board siding on a small shed that is falling through the deteriorating deck, are found on the Marginal Wharf. Creosote is observable on the piling and timber throughout the Marginal Wharf. Sampling has not been conducted to evaluate the extent of the impact of the creosote on the Marginal Wharf or the surrounding environment. Additional surveys are planned at Marginal Wharf to determine presence or absence of PCBs in electrical wiring/insulation and to sample sediments for petroleum contamination, PAH, and PCB analysis. The results of these surveys will inform handling and disposal requirements.

Considering the Navy and Coast Guard defense-related support activities during WWII and the following Cold War, respectively, there is potential for presence of unexploded ordnance (UXO) and/or munitions and explosives of concern (MEC) to be located in the waters below and near Marginal Wharf. UXOs and MEC may have entered Inner Womens Bay via ordnance fired over water during target training and/or gun function testing, ordnance dropped or fired at in water targets during training and/or gun function tests, ordnance lost during transfer to shore, anti-ship mines that were sunk and not detonated, and discarded munitions deliberately disposed of into the bay. While the U.S. Navy has identified areas requiring further UXO/MEC investigation, it does not currently have additional work planned due to technological limitations (AECOM, 2019). The USCG completed an underwater survey for UXO/MEC in November 2020 at the nearby Cargo Wharf; no UXO/MEC was identified.

4.7.2 Environmental Consequences

4.7.2.1 No Action

No action would lead to long-term adverse impacts to the surrounding environment. The continued degradation of the Marginal Wharf may release hazardous materials and debris to Inner Womens Bay. Hazardous and standard building materials on the structures, including creosote, asphaltic tar, wood debris, metal debris, and asbestos, are likely to enter Inner Womens Bay through the uncontrolled degradation process. The degradation may lead to contamination of surface sediment if the material sinks, or contamination to the intertidal area if the degraded material floats to shore. Direct human exposure is unlikely under the No Action Alternative, but may be possible during emergency repairs or cleanup of debris from the intertidal area.

4.7.2.2 Proposed Action

Hazardous Materials

The demolition of the structures would have minor short-term adverse impacts if vibratory extraction of the piles is conducted since it will temporarily mobilize sediments around the piles. Vibratory pile removal versus excavation of the piles generates less sediment disturbances and turbidity during demolition. Piles that are not removed by vibratory extraction should be cut at the mudline to minimize disturbance to sediments. BMPs described above in Section 2.4.4 will be utilized to minimize the impact of demolition. Even with BMPs in place, it is likely that some amount of demolition debris will fall into the bay and not be recovered. This demolition debris may potentially contain hazardous materials which could impact the surface sediments. Subtidal sediments in Inner Womens Bay are primarily sand and gravel with trace amounts of silt and clay (AECOM, 2019). Permanent removal of the hazardous materials associated with the demolition of Marginal Wharf and the seawater intake have a greater beneficial affect than if the material was to remain.

Human Health

The Proposed Action could have minor adverse impacts on worker health and safety, with the potential of major adverse impacts if UXO/MEC are encountered within the work area. The status and presence of UXOs in the work area should be established prior to demolition by completed an underwater magnetometer survey. If UXO/MEC is found, appropriate measures to protect safety of workers and water quality would be taken consistent with USCG protocols. These measures would mitigate the associated risk to health and safety to a less than significant level.

Workers could be exposed to risk of injury or death from on-the-job risks, including falling, slipping, tripping, falling objects, incidents with moving equipment and machinery with moving parts, exposure to hazardous substances, and exposure to excessive noise.

Contractors would be required to comply with Occupational Safety and Health Administration regulations regarding safety measures and precautions on the job site, reducing the potential impact from construction-related accidents.

Employees responsible for abating cement asbestos-board from the shed on top of the Marginal Wharf would be required to be trained and certified asbestos abatement workers. Personal protective equipment, including respirators, would be required when impacting ACM.

The general public outside of the project area should have no adverse health impact from the demolition work. Air quality monitoring and wet removal practices will be utilized during abatement of the non-friable cement asbestos board, which is located more than a mile from any schools, daycare facilities, family housing, or other designated outdoor recreational spaces where vulnerable children are most likely to be present. Land access to the project area is not public and is regulated by the USCG, ensuring that the project area is inaccessible. The work is taking part on USCG property, and should not adversely impact the health of low-income and/or minority communities.

4.8 Noise

This section addresses the ambient noise conditions and potential project impacts of in-air noise on human receptors. In-air and in-water noise effects on fish and wildlife are addressed in Section 3.5, Biological Resources.

4.8.1 Affected Environment

The Marginal Wharf and seawater intake structures are located at the northeast and southwest ends of the waterfront area of Base Kodiak on Nyman Peninsula, and accordingly have different noise baselines and proximity to sensitive noise receptors. The Kodiak Airport is the largest regular noise source near Base Kodiak, though noise exposure contours of 65 day-night average sound level and greater do not extend to either the Marginal Wharf or the seawater intake structures (MAKERS, 1996).

4.8.1.1 Marginal Wharf

Marginal Wharf is located at the tip of Nyman Peninsula, which has no facilities nearby that generate noise or are occupied by human noise receptors. Seafarer Drive has little vehicle traffic. The nearest uses are the fuel pier, approximately 700 feet to the northeast measured

from the northeast end of the wharf, and the fuel farm, which is approximately 1,000 feet to the northeast. Other uses within ½ mile include cutter supply storage buildings and personnel support facilities for shipboard personnel. Sensitive human receptors, such as hospitals, schools, and daycare facilities, are not found within a mile of the wharf.

Vehicles, ships, and support equipment are the primary noise sources in the immediate project area. Vehicle noise is transient and infrequent, generally contributing very low noise levels. No vessels dock at or are operated from Marginal Wharf.

4.8.1.2 Seawater Intake Structures

The seawater intake structures are located less than 900 feet from the closest point of the USCG Air Station, which hosts USCG helicopters and planes. The helicopters generate noise from the tarmac during testing, take-offs, and landings; the planes taxi from the hangars to the Kodiak Airport runways. Other minor noise sources in the area include ship and waterfront operations activity at the cargo wharf 1,000 feet to the southwest, motorized boats departing from and moored at the adjacent Boat House dock, and vehicle traffic on nearby roadways.

Other uses within ½ mile of the structures that may host sensitive human receptors are generally limited to USCG waterfront operations associated with the cargo wharf; commercial, personal services, and recreation facilities, such as the commissary, hair salon, movie theater, and guest house; office spaces; and residential barracks. A daycare and other community medical and religious services are located more than ½ mile away on the opposite side of the Air Station.

4.8.2 Environmental Consequences

Noise effects would be considered significant if project-related noise exposed sensitive human receptors to substantially higher levels of in-air noise. Potential impacts on biological receptors are discussed in Section 3.5, Biological Resources.

4.8.2.1 No Action

Under the No Action Alternative, there would be no short-term noise generation associated with demolition activities and there would be no change to ambient noise at either site.

4.8.2.2 Proposed Action

Demolition of the in-water and over-water structures in Inner Womens Bay would introduce temporary and intermittent construction noise at each of the project sites. As the

adjacent uses, presence of sensitive receptors, and equipment usage vary at each site, they are discussed separately below.

Marginal Wharf

Exhibit 3.8-1 lists noise levels associated with construction equipment that could be used during demolition of Marginal Wharf. Because there are no sensitive human receptors within one mile of the wharf, there would be no adverse noise impacts.

Exhibit 3.8-1: Construction Equipment Noise Levels from Equipment Potentially Utilized during Marginal Wharf Demolition

Equipment	Noise Level (dBA) 50 feet from Source
Vibratory pile driver	101
Pneumatic tools	85
Saw	84
Crane barge	76
Work boat	72

NOTES:

dBA = a-weighted decibel

Sources:

- 1 Federal Highway Administration, 2006, Construction Noise Handbook. Available: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/
- 2 Epsilon Associates, Inc., 2006, Phase 1 Final Design Report: Attachment J – Noise Impact Assessment Available: https://www3.epa.gov/hudson/pdf/2006_03_21%20Phase%20I%20FDR%20ATTACHMENT%20J.pdf

Seawater Intake Structures

Exhibit 3.8-2 lists noise levels associated with construction equipment that could be used during demolition of the seawater intake structures. Because there are sensitive human receptors within 1 mile of the demolition activity, there could be minor adverse noise impacts. However, the demolition activity at this location is anticipated to take only a few days and these receptors are all located near the USCG's Air Station. The only residential receptors within one mile are barracks occupied by single military personnel who would be at their workstations during the activity. Noise associated with demolition activity is anticipated to attenuate to ambient levels within 1,000 feet.

Exhibit 3.8-2: Construction Equipment Noise Levels from Equipment Potentially Utilized during Seawater Intake Structures Demolition

Equipment	Noise Level (dBA) 50 feet from Source
Concrete saw	90
Pneumatic tools	85
Chain saw	84
Crane barge	76
Work boat	72

NOTES:

dBA = a-weighted decibel

Sources:

- 1 Federal Highway Administration, 2006, Construction Noise Handbook. Available: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/
- 2 Epsilon Associates, Inc., 2006, Phase 1 Final Design Report: Attachment J – Noise Impact Assessment Available: https://www3.epa.gov/hudson/pdf/2006_03_21%20Phase%20I%20FDR%20ATTACHMENT%20J.pdf

4.9 Transportation

4.9.1 Affected Environment

The following characterization of the affected transportation environment of Kodiak Island is excerpted from USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

“Kodiak Island is accessible by air and sea. The Kodiak Airport, located just north of BSU Kodiak, is served by three scheduled airlines, and a number of air taxi services provide flights to other communities on the island. The Alaska Marine Highway System operates a ferry service to and from Seward and Homer from the Kodiak city pier. Approximately 140 miles of state roads connect island communities on the east side of the island (US Coast Guard 2009d). Onshore and marine transportation at BSU Kodiak are described below.”

4.9.1.1 Onshore Transportation

The nearest onshore transportation corridor is Seafarer Drive, although neither facility could be physically accessed from the land except at lower tides. According to the Kodiak Island Borough, Seafarer Drive is a paved quaternary road within the USCG-maintained road network. The USCG-maintained road network (20 cumulative miles) is isolated from the public road network (398 cumulative miles) by an Access Control Point (ACP) where entrance is granted upon proof of military affiliation. The ACP is located on Razanof Drive and Cape Sarichef Street, north of Seafarer Drive. Seafarer Drive is accessible to vehicles, bicycles, and pedestrians; however, the volume of traffic is limited to those with military

affiliation. Upland access to the project sites is available via Seafarer Drive and Tillamook Rock Cutoff Road. During proposed project demolition activities, no onshore transportation facilities would be utilized; all work would be conducted from a barge and work boats.

4.9.1.2 Marine Transportation

The offshore project activities for the Marginal Wharf and the seawater intake will occur within Inner Womens Bay on the northwestern side of Nyman Peninsula. Inner Womens Bay provides marine access to the Fuel Pier and Cargo Wharf. The fuel pier “is used for fueling Coast Guard cutters and partner agency vessels and for delivering fuel from fuel barges to the fuel farm. Fuel is delivered to BSU Kodiak four to six times per year.” The cargo wharf provides berthing for Base Kodiak cutters and visiting vessels.

According to the USCG (Putnam, pers. comm., January 24, 2020), Marginal Wharf is a navigation hazard for large vessels entering Inner Womens Bay, particularly during winter storm events with high winds (up to 100 miles per hour). The incoming cutters are pushed by the winds into Marginal Wharf, damaging the piles and decking further and mobilizing them to wash ashore, out into the bay, or out to sea where they can continue to pose a hazard to navigation and safety. As mentioned previously, these piles and decking are contaminated by creosote, asphaltic materials, and bitumen.

4.9.2 Environmental Consequences

4.9.2.1 No Action

Under the No Action Alternative, the existing facilities would remain and continue to pose risks to marine navigation in their current locations, particularly at Marginal Wharf and to a lesser degree at the seawater intake structure. Further, the deteriorating Marginal Wharf may present additional navigation and collision hazards to boat traffic if large, floating wooden piles or beams break free from the pier. No demolition or project construction would occur; therefore, there would be no project-driven changes in transportation use or needs.

4.9.2.2 Proposed Action

The Proposed Action could have minor and temporary adverse impacts on navigation during the construction period if vessels entering Inner Womens Bay are not aware of the barges and other watercraft operating around Marginal Wharf during demolition. However, entry into Inner Womens Bay would not be blocked and construction activity would be limited to safe weather conditions when visibility and vessel controls would be good. In the long term, the removal of Marginal Wharf and the seawater intake structure would eliminate a navigational hazard.

4.10 Infrastructure, Utilities, and Services

4.10.1 Affected Environment

4.10.1.1 Infrastructure

Marginal Wharf

The Marginal Wharf structure built in 1941 consists of creosote-treated timber piles and treated and untreated timber structural members. The wharf originally measured 30 feet wide by 1,680 feet long and ran roughly parallel to the northwestern shoreline of Nyman's Peninsula, with four access ramps connecting with land. In 1953, the wharf was extended 300 feet with creosote-treated timber structural members. After the 1964 Alaska earthquake caused the land around the pier to sink, it became subject to flooding during high tides and, consequently, maintenance was reduced and eventually discontinued. Much of the original structure has been reduced to eroding piles, none of the connecting ramps are left, and the few sections of decking that remain are covered with moss, grasses, and other vegetation. In 1953, after completion of the wharf extension project, the total surface area of the dock and access ramp was approximately 87,500 square feet. Currently, the total surface area of the remnant wharf structure is about 60,000 square feet. Treated timber piles are about 12 inches in diameter. The total number of piles observed above mean low water elevation is 1,236, and the total number of broken short piles below mean low water elevation is assumed to be 203.

Seawater Intake

The seawater intake is a concrete pier structure built-in 1941 to intake offshore saltwater for a WWII electric power plant. The approximately 250-foot-long and 4-foot-wide (1,000 square feet) pier structure was supported by concrete pile caps and steel H piles. Concrete decking was previously removed, and the pier foundations (pile caps and piles) and seawater intake structure at the end remain. Other upland concrete pile caps above the high tide line will remain. Currently, the surface area of the pile cap is 10 square feet and the intake structure is approximately 70 square feet.

4.10.1.2 Utilities

All prior utilities, primarily electricity and water, serving the Marginal Wharf and the seawater intake structure have been decommissioned.

4.10.1.3 Emergency Services

The USCG Base Kodiak Fire and Rescue Department is housed just south of the state's Kodiak Airport, approximately a 1.6-mile drive from the seawater intake and a 2.4-mile

drive from Marginal Wharf. The department is typically staffed by 32 civilian personnel but was operating with only 25 as of March 2020. The department provides services to the Kodiak Airport, the USCG Base Kodiak, and nearby roads.

Local hospitals or health clinics include the Alutiiq Health Clinic, Kodiak Community Health Center, Providence Kodiak Island Medical Center, and Mill Bay Health Center in nearby Kodiak, and the on-base Rockmore-King Medical Clinic that serves active-duty USCG and Department of Defense personnel as well as dependents and retired personnel when space is available. Emergency services have limited highway, marine, airport, floatplane, and helicopter access. Emergency service is provided by 911 telephone service and paid Emergency Medical Service.

4.10.2 Environmental Consequences

Effects on utilities, infrastructure, or services would be considered significant if the Proposed Action created a demand that exceeded the capacity of the service provider.

4.10.2.1 No Action

Under the No Action Alternative, the derelict structures would remain and there would be no changes to existing infrastructure or changes in demand for utilities or services. In their existing locations and conditions, the existing facilities pose a navigation hazard that could require emergency services to respond. Therefore, retention of the derelict structures under this alternative would have a minor adverse effect.

4.10.2.2 Proposed Action

During proposed demolition activities, there could be some need for emergency services in the event of an accident or spill. However, after the completion of demolition and materials removal, there would no longer be any infrastructure that could pose a safety threat or hazard.

4.11 Visual Resources

4.11.1 Affected Environment

The following characterization of the visual resources of the project area is excerpted from USCG's *Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska* (2010):

"Kodiak Island is characterized by rugged coastlines, dense stands of trees, lowland grassy meadows, and wetlands. Steep mountains, rocky mountain peaks, and mountain ranges extend from the island's coastlines into the inland interior. Birch,

alder, willow, cottonwood, and Sitka spruce are common on the island. Streams, rivers, wetlands, inlets, bays, and offshore islands provide habitat for a diversity of scenic wildlife, including whales, bald eagles, sea birds, deer, elk, mountain goats, and spawning salmon.”

The region of influence for visual resources is the Base Kodiak waterfront and viewpoints from which Marginal Wharf or the seawater intake are visible. Given the limitation of access to Base Kodiak to personnel and approved visitors, the primary public views of the structures are from the Chiniak Highway/Rezanof Drive West across Inner Womens Bay. The roadway is approximately 0.45 mile from Marginal Wharf and 0.34 mile from the seawater intake. Although the structures are visible from the road, they are low-profile and constructed of non-glare materials and as such generally fade into the background, which is primarily riprap banks with areas of grass and shrub vegetation interrupted by large working over-water structures (Fuel Pier, Cargo Wharf, and the USCG Boat House dock). Upland of Marginal Wharf, the forested end of Nyman Peninsula rises above Seafarer Drive and the wharf deck; the existing wharf does not detract from that view.

The views across Women’s Bay from Seafarer Drive are dominated by mountains rising steeply from the shoreline above Chiniak Highway/Rezanof Drive West. The low height of the Marginal Wharf and seawater intake structures in relation to Seafarer Drive precludes them from obscuring or degrading that view.

4.11.2 Environmental Consequences

Effects on visual resources would be considered significant if project-related actions substantially altered the scale or the character of the existing area or substantially degraded the views from recognized sensitive viewpoints or receptors in the area.

4.11.2.1 No Action

Under the No Action Alternative, existing structures would remain and there would be no change to the visual environment in the short term. The condition of the structures would continue to degrade, however, as these structures are not maintained. The Marginal Wharf is particularly vulnerable to damage from storm-driven waves and passed USCG vessels. Given the lack of nearby sensitive viewpoints and the industrial character of the Base Kodiak waterfront, this would not be a substantial visual change and therefore would not result in a significant adverse effect.

4.11.2.2 Proposed Action

The Proposed Action would have minor and temporary adverse impacts on visual resources during demolition activities. Large boats and other barge-mounted equipment are regularly

present in Inner Womens Bay either in support of USCG activities or related to Matson shipyard operations on the opposite shore. The presence of a project-related barge or equipment during one construction season would not be a new visual intrusion in this setting. After implementation, degraded concrete and wood structures that do not presently enhance the visual setting of the waterfront or Inner Womens Bay would be absent. Therefore, the Proposed Action would have no long-term adverse effect on visual resources.

4.12 Cultural and Historic Resources

4.12.1 Affected Environment

Cultural resources are districts, buildings, sites, structures, areas of traditional use, or objects with historical, architectural, archaeological, cultural, or scientific importance. They include archaeological resources (both prehistoric and historic), historic architectural resources (physical properties, structures, or built items), and traditional cultural resources (those important to living Native Americans, including Alaska Natives, for religious, spiritual, ancestral, or traditional reasons). Maritime cultural resources can include submerged prehistoric sites, shipwrecks and associated debris, and historic materials that were intentionally dumped or lost during historic use of the bay and its shoreline.

The NHPA establishes national policy for protecting significant cultural resources that are defined as "historic properties" under 36 CFR 60.4. NHPA Section 106 (36 CFR §800) requires that federal agencies consider and evaluate the effect that federal projects may have on historic properties under their jurisdiction. Only significant cultural resources are considered for potential adverse impacts from a federal action.

Although NEPA does not explicitly define cultural resources, the Act requires agencies to consider the effects of their actions on all aspects of the human environment, including the significance of impacts on an area's unique characteristics, such as "historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, and ecologically critical areas" (40 CFR 1508.27(b)(3)). Evaluating the significance of impacts weighs in part the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP) or actions that may cause loss or destruction of significant scientific, cultural, or historical resources (40 CFR 1508.27).

NEPA therefore introduces two conditions to accounting for cultural resources: one a specific category of historic resources (sites, buildings, structures, objects, and districts) eligible for the NRHP as defined by the NHPA; the other a more general understanding of cultural or historic resources that may more broadly include local historic registers, places of

significant community interest, Native American sacred sites or other resources of Tribal concern.

4.12.1.1 Historic Context

The following historic context summarizes a more in-depth treatment (with citations) provided in a Section 106 report for the Waterfront Demolition Project prepared for the USCG (Sneddon and others, 2020: 21-34).

The original inhabitants of Kodiak Island were the sea-dependent Alutiiq people, who inhabited Kodiak Island for some 7,300 years prior to western contact. Russian settlers arrived in the late 18th century, and the Russian settlement on Kodiak Island served as a base for fur trading for the next 80 years. After the United States purchased Alaska in 1867, fishing replaced the fur trade on Kodiak as the mainstay of the economy.

In the late 1930s, the growing threat of war with Japan led the United States to begin constructing a network of military bases throughout the Alaskan territory. Construction on the Kodiak Island naval base began on September 23, 1939. The Navy, Army, and Army Air Corps would eventually share the base, which included support facilities for aircraft, submarines, and ships, as well as coastal defenses and extensive troop housing, making Kodiak one of the most fortified facilities in Alaska.

Several waterfront facilities on Womens Bay were constructed to support base operations, including a tanker and tender pier (later designated the fuel pier), small vessel moorings, a crash boat house, and a marginal wharf for the submarine base.

The Japanese invasion and occupation of two Aleutian Islands, Attu and Kiska, several months after the attack at Pearl Harbor made Alaska and the North Pacific a major theater in the first years of WWII. The base was never attacked during the war, but forces from Base Kodiak carried out patrols by air and sea; supported search-and-rescue efforts; serviced surface vessels, submarines, and aircraft; and provided supplies for other bases and operations. At its height, Kodiak had over 1,200 buildings and housing for more than 40,000 personnel. After Attu and Kiska were retaken in 1943 and the Japanese threat to Alaska subsided, operations were scaled back at Kodiak and other Alaskan naval bases. By May 1944, many of the Army coastal artillery and infantry units had departed. The submarine base was decommissioned the following year. The war marked the beginning of a large and ongoing military presence on the island, which brought significant change to the island's economy and population.

The emergence of the Cold War in the late 1940s and the assignment of a USCG detachment to Base Kodiak renewed its strategic importance but with new missions. During the Cold

War, naval forces from Kodiak carried out reconnaissance missions, military air transport services, air and sea patrols, and antisubmarine maneuvers, primarily with aircraft. The Navy also built a new communications complex to support operations.

Under the direction of Secretary Robert McNamara, the Department of Defense pursued a program of base closures during the 1960s that looked closely at Alaskan military installations. Additionally, as part of a series of cutbacks in this period, the Navy phased out its seaplanes and seaplane tenders, the type of aircraft Base Kodiak was originally designed to support, and eliminated several district commands, including the 17th Naval District headquartered at Kodiak. As plans called for closure of Base Kodiak in 1972, Alaskans protested the military cuts that left one fifth of the land area of the United States, “without the capacity to defend itself against conventional attack.” Whereas the Navy was scaling back operations in Alaska, the Coast Guard’s presence at Kodiak had been gradually increasing, incorporating new technologies, vessels, and aircraft to carry out its missions. Ultimately, the Navy transferred Base Kodiak to the USCG in 1972, ending a 33-year-long history with the facility.

After the Navy left Kodiak, the USCG began the long process of converting the former Navy base to its needs. Because of the presence of the cutters, Long-Range Navigation supply mission, and other vessel berthing uses, the fuel and cargo facilities remained important assets while most of the WWII-era buildings and structures along the northwestern shoreline of Nyman Peninsula were torn down or abandoned. Although re-built in the mid-1950s, by the 1970s the Marginal Wharf had deteriorated to a point that the USCG chose not to invest further in its maintenance, instead committing resources to upgrading the other waterfront support facilities on Nyman Peninsula, the fuel pier, and cargo pier.

By the 1980s, Base Kodiak was the largest of the USCG bases in terms of property, combined air and sea assets, and area of operations. To improve the freight transfer and berthing capacity of the cargo pier, in 1986 the USCG added a second section, approximately 445 feet long, to the southwest end of the pier. The USCG vessels, together with the air assets, have continued to rely on its waterfront facilities, modernized over the years, to carry out core missions and support the base.

4.12.1.2 Existing Cultural Resources

In 1985, a 3,000-acre area encompassing land within the former military holdings on Kodiak Island was designated the Kodiak Naval Operating Base and Forts Greely and Abercrombie NHL by the Secretary of the Interior, commemorating the role of the naval base and coastal defenses in WWII. The larger section of the discontinuous NHL (referred to as the Kodiak NOB NHL) encompasses a portion of the former naval operating base, land-plane airfield,

part of the former Army garrison, and ordnance magazines; a smaller section of the NHL lies within the Fort Abercrombie State Park north of the former naval base.

NHLs are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Along with Sitka Naval Base, Dutch Harbor Naval Base, and Ladd Field, the Kodiak NOB represents the build-up of Alaska's defenses from almost nothing in 1938 to important contributors to the U.S. war effort in the North Pacific.

A 1997 survey provided the basis for determining contributing resources to the Kodiak NOB NHL. On the Nyman Peninsula waterfront, the few extant WWII-era buildings and structures recommended for the NHL included the Marginal Wharf (capitalized resources indicated NRHP status), former Battery Overhaul Shop S-3 (no longer extant), and central Power Plant. Since 1997, several other surveys conducted to comply with Section 106 of the NHPA have evaluated buildings and structures in the vicinity of the project, not only for WWII significance but for associations with the Cold War era and USCG.

To fulfill the broader consideration of cultural resources beyond the NHPA definition of historic properties required under NEPA (40 CFR 1508.27), additional survey examined other potential impacts of the project. Research identified no local or county historic registers that listed historic properties within the area of potential effects (APE) or in the vicinity of the project, or areas of tribal significance that would be adversely affected by the project, or that indicated the resources affected by the project were culturally significant beyond the NHL and NRHP designations.

Aboveground Resources in the Area of Potential Effects (APE)

A Section 106 review of the Waterfront Demolition Project prepared for the USCG delineated an APE for the project that included direct effects (demolition of the Marginal Wharf and seawater intake structure) and potential indirect effects (in this case, the visual effects associated with the demolition). The Section 106 review identified six historic properties within the project's APE: the Marginal Wharf, a contributing resource to the Kodiak NOB NHL; three seaplane ramps; the Air Station Apron; and the former cargo pier Transit Shed (Building 614, now an auto hobby shop), determined eligible for the NRHP for its association with Navy and USCG logistics. The seawater intake structure slated for demolition was determined not eligible for the NRHP (Sneddon and others, 2020: 11, 49-50).

Archaeological Resources in the Area of Potential Effects

No prehistoric or historic archeological sites have been identified near the Marginal Wharf or seawater intake structure. The closest recorded sites include KOD-00563, a "prehistoric tomb" found in 1973 by USCG personnel eroding from the coastal bluff on the southeast

side of Nyman Peninsula, and KOD-00200, a grass-covered mound of thin layers of midden materials discovered in 1996, also on the southeastern edge of the peninsula. Skeletal remains were excavated from KOD-00563 and a large number of artifacts recovered. The northwestern side of Nyman Peninsula has been heavily disturbed by activities related to construction of the waterfront facilities, which included dredging and filling, road grading, and excavation for foundations and utilities. Fill was added to extend the buildable area in the northwest, and a utility corridor was installed along the northwestern shoreline to connect the Marginal Wharf and fuel pier with water, electrical, steam, and petroleum service. The Section 106 review of the project found the demolition efforts highly unlikely to encounter or adversely impact archaeological resources since no excavation is planned (Sneddon and others, 2020: 11, 53).

4.12.1.3 Native Alaskan Tribes

Kodiak-affiliated Native Tribes include the Sun'aq Tribe of Kodiak, Koniag, Inc., Leisnoi, Inc., and Natives of Kodiak. Tribal leaders will be notified of the availability of this draft EA.

4.12.2 Environmental Consequences

4.12.2.1 No Action

The No Action Alternative may have an impact on cultural resources, including contributing resources of the Kodiak NOB NHL. Because the Marginal Wharf is not maintained, further exposure to weather, water, and wave action will likely continue the deterioration of the structure. Waterborne detachment of wharf materials will not only diminish the historic integrity of the structure, but result in hazards to navigation. In sum, the No Action Alternative may result in an adverse effect on a historic property under the terms of the NHPA.

4.12.2.2 Proposed Action

Transit Shed (Building 614)

Because demolition of the Marginal Wharf and seawater intake structure will not affect the character-defining features and historic integrity of the former Transit Shed (auto hobby shop Building 614), which was built in 1968, the project will not adversely affect the historic property.

Marginal Wharf

The Marginal Wharf, part of the WWII-era submarine base located at the southwest end of Nyman Peninsula, has been previously determined a contributing resource to the Kodiak

NOB NHL. The original wharf was a timber pile structure with wood decking 1,400 feet long by 30 feet wide, equipped with a fresh-water line, a 30-ton stiff-leg derrick, and three transit sheds. After the war, the Navy extended the wharf and re-built it in the mid-1950s.

Over the past two decades, the integrity of the Marginal Wharf has considerably deteriorated. The extensive decay of the decking makes the original design difficult to discern, and what is left of the wharf is a mix of materials from original construction and the extensive repairs and replacements of the 1950s and 1960s. Demolition of the buildings associated with the submarine base after 1972 has significantly altered the wharf's original setting, and its advanced deterioration and lack of any operational presence or function has diminished the integrity of feeling and association. Although the wharf poorly represents its wartime significance, the USCG's Section 106 review determined that the demolition of the Marginal Wharf would adversely affect the Kodiak NOB NHL and a memorandum of agreement is currently under development with the NPS and OHA to mitigate for the adverse effect.

The proposed action will result in an adverse effect to the Kodiak NOB NHL. However, under 36 CFR 800.8, a finding of adverse effect on a historic property under the Section 106 rules of the NHPA does not necessarily constitute a finding of significant impact under NEPA, which considers the impact of the proposed action on society more broadly.

Evaluating the significance of the proposed action under the terms of 40 CFR 1508.27 considers both the context and intensity of the project. The general context of the site has both national and local significance as a military base associated with WWII, with USCG operations in Alaska, and as a major contributor to the local economy and culture. Within the multiple contexts, however, demolition of the Marginal Wharf and seawater intake structure does not constitute a significant adverse action under NEPA for two primary reasons:

1. The diminished integrity of the Marginal Wharf.

Since the Marginal Wharf was initially identified as potential contributing resource to the Kodiak NOB NHL in 1985, all the other former buildings and structures associated with the submarine base have been demolished. Over the past three decades, the wharf has undergone a significant deterioration of important aspects of integrity including design, materials, setting, feeling, and association. Consequently, it is relatively difficult to ascertain the wharf's connection to NHL compared to hangars, barracks, and other actively used buildings with good historic integrity. In sum, removal of the Marginal Wharf would not significantly diminish the overall integrity of the Kodiak NOB NHL under the terms of 40 CFR 1508.27.

2. Mitigation planned for the proposed action.

The USCG, the NPS, and the Alaska OHA are currently developing a memorandum of agreement to mitigate for the adverse effect of the Proposed Action under Section 106 rules. The mitigation is intended to lessen the impact of the loss of a historic property and will focus on both improved interpretation of the site as part of a former submarine base and broadening public access to that history.

5 CUMULATIVE EFFECTS

A cumulative effect is defined as “the impact on the environment that results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other action (40 CFR Part 1508.7).”

The cumulative analysis considers large-scale programs or changes being planned or implemented in the vicinity of the Proposed Action. Since the Proposed Action is limited to in- and over-water work at Inner Womens Bay on Base Kodiak, other actions considered in this section will be limited to those with an in- or over-water work component in Inner Womens Bay. Exhibit 4-1 lists the actions included in the cumulative effects analysis.

Exhibit 4-1: Actions Evaluated for Cumulative Effects

Cumulative Action	Action Description
Fuel Pier and Cargo Wharf Upgrades	In 2015, the Fuel Pier and Cargo Wharf both received upgrades. At the Fuel Pier, smaller-diameter “camels” (floating fenders that protect a boat and the adjacent structure) were replaced with larger-diameter camels, utilities were upgraded to improve fire safety, and the deck was rehabilitated. The Cargo Wharf upgrades also included camel replacement as well as installation of new fender piles.
Homebasing of C130J Aircraft	In conjunction with upland improvements at the Air Station, this project replaced an existing stormwater outfall at the northeast corner of Inner Womens Bay. The project was completed in 2018.
Stormwater Outfalls Associated with Storis Water Line Replacement	In conjunction with upland replacement of a 10-inch water main along Storis Drive, renovation of a stormwater lift station, and renovation of stormwater conveyances, this project will include replacement of three existing stormwater outfalls and construction of one new outfall. Work is anticipated to occur from 2020 through 2022.
Homeporting Fast Response Cutters and Offshore Patrol Cutters (USCG, 2019)	This project includes a mix of upland and aquatic elements. Preliminary plans indicate that work waterward of the high tide line includes expansion of the Cargo Wharf by approximately

Cumulative Action	Action Description
	8,000 square feet of fixed pile pier and 15,000 square feet of floating pier. While Cargo Wharf improvements are in progress, the Fuel Pier will need to accommodate displaced boats. Therefore, improvements to the Fuel Pier will need to be made prior to commencement of Cargo Wharf construction – including new and replacement dolphins, expanded and replacement over-water cover, replacement fender piles and camels, new abutment, and other utility upgrades. Construction will occur in phases – potentially from 2021 through 2023.

Air Quality. The Proposed Action would have minor and temporary adverse impacts on air quality during construction, but there would be no long-term increases. There are two other projects listed in Exhibit 4-1 that may have concurrent construction activity in 2021. However, even combined, no violations of national ambient air quality standards are expected to result given the current air quality and the meteorological conditions (high winds) in the project area.

Geology and Soils. The Proposed Action and cumulative actions would have incremental beneficial impacts by improving safety at Base Kodiak in the event of a major seismic event. Ground disturbances during pile removals and installation and stormwater outfall replacements and installation associated with the Proposed Action and cumulative actions would have short-term adverse effects on substrate conditions, the extent of which would be mitigated through use of standard BMPs. Upland elements of some of the cumulative actions may also temporarily increase potential for erosion; BMPs would minimize the duration and magnitude of any adverse effects.

Water Resources and Water Quality. The Proposed Action and cumulative actions would have minor adverse impacts from increased turbidity and contamination risk during construction activities. Effects of any cumulative construction actions would be minimized through compliance with federal and state approvals and regulations, particularly compliance with the federal ESA and Marine Mammal Protection Act, the USCG's Stormwater Pollution Prevention Plan, and State-approved EMPs. In the long term, the Proposed Action may have beneficial effects on water quality through removal of hazardous materials (treated piles and decking). The long-term operations at the Fuel Pier and Cargo Wharf are expected to maintain quality consistent with state and federal standards. The Storis Water Line Replacement project is also expected to have beneficial effects on water quality through capture and treatment of previously untreated stormwater discharges to Inner Womens Bay.

Biological Resources. The Proposed Action and cumulative actions would have no incremental adverse impact on federally listed species. One or more of the cumulative

actions, however, may have adverse effects on critical habitat or EFH. All the activities would be subject to consultation with USFWS and NOAA Fisheries, and the projects would comply with any required or recommended conservation measures. The area of artificial over-water cover and the number of piles would decrease overall due to the removal of Marginal Wharf. While that is generally a beneficial effect, juvenile red king crabs, a NOAA trust resource, prefer pile habitats. Marginal Wharf is also a known nesting site for seabirds, including a colony of glaucous-winged gulls.

Land Use. The Proposed Action and cumulative actions would have no significant incremental adverse land use impacts. All considered actions would take place on federal lands already developed for the proposed uses and would be consistent with approved land use plans.

Hazardous Material and Human Health. The Proposed Action and cumulative actions would have minor to major incremental beneficial impacts in the long term by improving safety (reduced seismic and fire risk) at the Fuel Pier, Cargo Wharf, and Marginal Wharf. In the short term, however, there would be standard human health risks during construction and demolition activities. The Proposed Action would also remove a substantial quantity of existing hazardous materials. All projects have the potential to disturb potentially contaminated sediments during demolition and construction activity. Use of BMPs, such as turbidity curtains, will help minimize transport of those sediments to other areas while the material resettles on the bottom.

Noise. Given the dispersed nature of the Proposed Action and many of the cumulative actions along the northwest shore of Nyman Peninsula, the Proposed Action would have no incremental adverse noise impacts resulting from the use of mechanized equipment. There are relatively few potential sensitive noise receptors within 1 mile of the projects, and the nature of standard USCG operations at the Air Station and waterfront facilities already introduces intermittent loud noises into the baseline environment.

Transportation. The Proposed Action would have minor beneficial impacts by removing navigation hazards. Construction associated with the Proposed Action and cumulative actions could have minor and temporary adverse effects by increasing congestion in the waterway if multiple projects are scheduled for the 2021 construction season. The upland construction activities associated with several of the cumulative actions may also cause congestion on Seafarer Drive.

Infrastructure, Utilities, and Services. The Proposed Action removes derelict and obsolete infrastructure and eliminates hazards that could have required emergency services. The

other cumulative actions would upgrade existing infrastructure and utilities and reduce the demand for emergency services through associated safety improvements.

Visual Resources. The Proposed Action would have long-term beneficial effects on visual resources due to removal of degraded structures that do not enhance the visual environment. However, the expansion of the Cargo Wharf may have minor incremental adverse impacts on visual resources compared to current conditions, but the changes would be consistent with the existing character of this industrial waterfront area.

Cultural and Historic Resources. The Proposed Action will result in the loss of a historic property. The USCG will work with the NPS and the Alaska OHA to develop an appropriate mitigation plan. The cumulative actions are not anticipated to further degrade the Kodiak NOB NHL or affect any cultural resource sites.

6 ENVIRONMENTAL SIGNIFICANCE OF THE PROPOSED ACTION

The Proposed Action would impact the following resource areas: air quality, water resources and water quality, biological resources, hazardous materials and human health, noise, transportation, and cultural and historic resources. Most of these adverse effects would be short term and are less than significant (see Chapter 3). In addition, the Proposed Action would have long-term beneficial impacts by removing hazardous materials and a potential navigation and safety hazard.

The project has been or will be coordinated with the following federal and state regulatory agencies, to ensure compliance with applicable regulations: USACE, USFWS, NOAA Fisheries, ADEC, SHPO, and NPS. Native tribes and other potential parties of interest will also be notified of the availability of this EA and provided an opportunity to comment.

7 LIST OF AGENCIES AND PERSONS CONSULTED

Contact	Date(s) Contacted	Contact Information
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9 REFERENCES

AECOM, 2019, Draft preliminary assessment report, solid waste management unit, site 32 – Inner Womens Bay, RCRA permit AK9690330742, USCG Base Kodiak: Report prepared by AECOM, Contract HSCG50-14-PSL008, Order 70Z08718FPXA70400, for U.S. Coast Guard, July.

Alaska Department of Environmental Conservation (ADEC), 2018, State of Alaska 2014/2016 Final Integrated Water Quality Monitoring and Assessment Report, November 2, 112 p.

Alaska Department of Fish and Game (ADF&G), 2008, Alaska Department of Fish and Game: Puffins, accessed April 22, 2021, at <https://www.adfg.alaska.gov/static/education/wns/puffins.pdf>.

Alaska Department of Fish and Game (ADF&G), 2019, Humpback Whales — Wildlife Viewing, Alaska Department of Fish and Game, accessed January 23, 2020, at Alaska Department of Fish and Game at <http://www.adfg.alaska.gov/index.cfm?adfg=viewing.marinemammals&species=humpbackwhale>.

Baraff, L.S.; Foy, R.J.; and Wynne, K.M., 2005, Summer distribution and habitat characteristics of fin whales and humpback whales in Steller sea lion critical habitat off northeast Kodiak Island, 2002-2003, p. 120–140.

Bechtol, W.R., and Kruse, G.H., 2009, Reconstruction of historical abundance and recruitment of red king crab during 1960–2004 around Kodiak, Alaska: Fisheries Research 100 (2009) 86–98.

Bentley, Marc, 2019, Environmental Specialist, Alaska Department of Environmental Conservation. Telephone conversation with Schylar Healey (Shannon & Wilson), November 5.

- Cobb, M., 2018, Northern Sea Otter (*Enhydra lutris*) Abundance and Distribution on the Kodiak Archipelago, Alaska: U.S. Fish & Wildlife Service (USFWS) 2018.2, 18 p., accessed at <https://data.doi.gov/dataset/northern-sea-otter-enhydra-lutris-abundance-and-distribution-on-the-kodiak-archipelago-ala/resource/6cbd5fb8-695a-4ce0-b4dd-0293082376b5>.
- Corcoran, R.M., 2013, Seabird Colony Report, Kodiak Archipelago, Alaska 1975-201. *Unpubl.* Refuge Report 02-13: U.S. Fish and Wildlife Service, Kodiak National Wildlife Refuge, 88 p.
- Dew, C., 1990, Behavioral ecology of podding red king crab, *Paralithodes carnschatica*. Can. J. Fish. Aquat. Sci. 47: 1944-1 958.
- Dew, C., 1991, Characterization of preferred habitat for juvenile red king crab in three Kodiak bays. Final report, 12 July. National Marine Fisheries Service, Kodiak, AK.
- eBird, 2020, eBird: An online database of bird distribution and abundance [web application]. eBird, Ithaca, New York. Available: <http://www.ebird.org>. (Accessed: January 6, 2020)
- eBird, 2021, eBird: An online database of bird distribution and abundance [web application], Checklist S71306027, S72269905, S69919838, eBird, Ithaca, New York. Available: <http://www.ebird.org>. (Accessed: March 2021)
- Fredrickson, L.H., 2001, Steller's Eider (*Polysticta stelleri*) (A. Poole & F. Gill, Eds.): The Birds of North America Online.
- Hardin, M., 2014, *Haematopus palliatus* (American oystercatcher), accessed April 22, 2021, at Animal Diversity Web at https://animaldiversity.org/accounts/Haematopus_palliatus/.
- Kodiak Island Borough; Bechtol Planning & Development; ASCG Incorporated; and M. R. Stearns Planning + Design LLC, 2006, Womens Bay comprehensive plan update: Kodiak, Alaska, Kodiak Island Borough KIB Planning and Zoning Commission, 50 p., December, available: <http://www.kodiakak.us/DocumentCenter/View/335>
- Kodiak Island Borough, 2008, Kodiak Island Borough Comprehensive Plan Update. January. Available: <https://www.kodiakak.us/DocumentCenter/View/1507/2008-Comprehensive-Plan-Updatepdf---Adobe-Acroba?bidId=>
- Krause, G.G.; Workman, G.; and Phillips, A.C., 2001, A Phase '0' review of the biology and fisheries of the Tanner Crab (*Chionoecetes bairdi*). Fisheries and Oceans Canada, Research Document 2001/160. Available: <file://sea-fs1/Vol1/EF/SEA/104000s/104176%20Kodiak%20Waterfront%20Demo/003%20EA%20-%20PreDraft/Research/Critters/Tanner%20crab%20study.pdf>

- Long, W.C.; Cummiskey, P.A.; and Munk, J.E., 2012, Ghostly killers: effects of lost fishing gear on red king crab in Womens Bay, Kodiak, Alaska: Alaska Fisheries Science Center Quarterly Report, January-February-March, p. 17-18, available: https://www.afsc.noaa.gov/quarterly/jfm2012/AFSC_Quarterly_Report_JFM2012.pdf
- Long, William Christopher, 2020, Research Ecologist/Research Fishery Biologist, National Marine Fisheries Service. Email communication and phone conversations with Amy Summe (Shannon & Wilson), 16 and 21 January, and 17 and 20 July.
- MAKERS Architecture and Urban Design, 1996, Integrated Support Command (ISC), Kodiak Master Plan/Environmental Assessment. Prepared for U.S. Coast Guard, 339 p. November.
- Michael Baker Jr., Inc., 2009, Waterfront Development Plan ISC Kodiak, Alaska. Prepared for U.S. Coast Guard. March. 249 p.
- Michaud, M., 2019, Glaucous-Winged Gull – March 2019 Bird of the Month – Kachemak Bay Birders: at <https://kachemakbaybirders.org/blog/2019/03/01/glaucous-winged-gull-march-2019-bird-of-the-month/#:~:text=Breeding%20Season%3A%20Begins%20mid%2DMay,e.g.%2C%20puffins%2C%20murre>).
- Mitzel, Andy, 2020, Regulatory Project Manager, U.S. Army Corps of Engineers. Email communication and phone conversation with Amy Summe (Shannon & Wilson), July 10.
- National Marine Fisheries Services, National Oceanic and Atmospheric Administration (NOAA Fisheries), 2009, Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Southwest Alaska Distinct Population Segment of the Northern Sea Otter: v. 74, no. 194, p. 51987–52012.
- National Marine Fisheries Service, National Oceanic and Atmospheric Administration (NOAA Fisheries), 2015, Endangered Species Act Section 7(a)(2) biological opinion, Kodiak ferry dock and terminal improvements: NMFS consultation number AKR-2015-9446, July 31, available: <https://www.fisheries.noaa.gov/resource/document/biological-opinion-kodiak-ferry-dock-and-terminal-improvements>.
- National Marine Fisheries Service, National Oceanic and Atmospheric Administration (NOAA Fisheries), 2019, Alaska Protected Resources Division: Species Distribution Mapper, accessed January 30, 2020, at <https://alaskafisheries.noaa.gov/portal/apps/webappviewer/index.html?id=0c4a81f75310491d9010c17b6c081c81>.

- National Marine Fisheries Services, National Oceanic and Atmospheric Administration (NOAA Fisheries), 2020, Alaska Protected Resources Division: EFH Web Mapper, accessed July 9, 2020, at <https://alaskafisheries.noaa.gov/portal/apps/webappviewer/index.html?id=bf2254ed51f444a8a16c564addd54250>
- National Marine Fisheries Service, National Oceanic and Atmospheric Administration (NOAA Fisheries), 2021, Endangered and Threatened Wildlife and Plants: Designating Critical Habitat for the Central America, Mexico, and Western North Pacific Distinct Population Segments of Humpback Whales: Federal Register, v. 86, no. 75, p. 21082–211157.
- North Pacific Fishery Management Council (NPFMC), October 2018, Fishery Management Plan for the Salmon Fisheries in the EEZ Off Alaska, 186 p., accessed at <https://www.npfmc.org/wp-content/PDFdocuments/fmp/Salmon/SalmonFMP.pdf>.
- North Pacific Fishery Management Council (NPFMC), 2019, Fishery Management Plan for Groundfish of the Gulf of Alaska, 130 p., accessed December 9, 2019, at <https://www.npfmc.org/wp-content/PDFdocuments/fmp/GOA/GOAfmp.pdf>.
- Putnam, Ian, 2020, NEPA Specialist Research, U.S. Coast Guard. Telephone conversation with Amy Summe (Shannon & Wilson), 24 January.
- Rosenberg, D.H.; Petrula, M.J.; Zwiefelhofer, D.; and others, 2016, Seasonal movements and distribution of Pacific Steller's eiders: Juneau, Alaska, Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR-2016-7, 43 p., available: <http://www.arlis.org/docs/vol1/M/953804474.pdf>.
- Ryer, C. and Copeman, L., 2012, Towards an understanding of nursery quality for juvenile Tanner crab: Alaska Fisheries Science Center Quarterly Report, January-February-March, p. 18-20, available: https://www.afsc.noaa.gov/quarterly/jfm2012/AFSC_Quarterly_Report_JFM2012.pdf
- Sato, C., 2018, Periodic Status Review for the Sea Otter (2018): Washington Department of Fish and Wildlife, Olympia, Washington, 29 p., accessed at <https://wdfw.wa.gov/sites/default/files/publications/01965/wdfw01965.pdf>.
- Sea Grant Alaska, 2012, Aerial Surveys | Whales | Gulf Apex Predator-Prey Project | Kodiak, Alaska, accessed January 23, 2020, at Gulf Apex Predator-Prey Project at <https://seagrant.uaf.edu/map/gap/marine-mammals/whales/aerial-surveys.php>.
- Sneddon, M.; Miller, H.L.; and Sweeney, M.A., 2020, Section 106 review of proposed USCG Base Kodiak waterfront demolition project: Report prepared for the USCG by Historical Research Associates and Northern Land Use Research Alaska, March.

- Stichert, M., 2012, Fishery Management Plan for the Commercial Tanner Crab Fishery in the Kodiak District, 2013. Alaska Department of Fish and Game, Fishery Management Report No. 12-41. December. Available: <file:///sea-fs1/Vol1/EF/SEA/104000s/104176%20Kodiak%20Waterfront%20Demo/003%20EA%20-%20PreDraft/Research/Critters/Tanner%20Crab%20FMP%202012.pdf>
- The Whidbey Audubon Society (Audubon Society), 2019, Pigeon Guillemot Study, accessed April 22, 2021, at Whidbey Audubon Society at <https://www.whidbeyaudubonsociety.org/pigeon-guillemot-study>.
- U.S. Coast Guard (USCG), 2010, U.S. Coast Guard Environmental Assessment: Recapitalization of the Fuel Pier, Base Support Unit Kodiak, Alaska: Report prepared by Environmental Management and Planning Solutions, Inc, San Francisco, California, and Michael Baker Jr., Inc., Beaver, Pennsylvania, October.
- U.S. Coast Guard (USCG), 2019, DRAFT Environmental Assessment for Homeporting Fast Response Cutters and Offshore Patrol Cutters at U.S. Coast Guard Base Kodiak. Oakland, CA. May. *Unpubl.*
- U.S. Fish and Wildlife Service (USFWS), 2002, Steller's Eider recovery plan: Fairbanks, Alaska, U.S. Fish and Wildlife Service, available: https://ecos.fws.gov/docs/recovery_plan/020930b.pdf.
- U.S. Fish and Wildlife Service (USFWS), 2012, Observer Protocols for Pile Driving, Dredging and Placement of Fill. Anchorage Fish and Wildlife Field Office. Draft, August 7.
- U.S. Fish and Wildlife Service (USFWS), 2014, Stock assessment report (SAR) for northern sea otter (*Enhydra lutris kenyoni*), southwest Alaska stock: 23 p., April, available: https://www.fws.gov/alaska/fisheries/mmm/stock/Revised_April_2014_Southwest_Alaska_Sea_Otter_SAR.pdf.
- U.S. Fish and Wildlife Service (USFWS), 2020a, U.S. Fish and Wildlife Service Solicits Public Input on Proposed Rule and Environmental Impact Statement for Migratory Bird Treaty Act, accessed February 18, 2020, at <https://www.fws.gov/news/ShowNews.cfm?ref=u.s.-fish-and-wildlife-service-solicits-public-input-on-proposed-rule-and-&ID=36517>.
- U.S. Fish and Wildlife Service (USFWS), 2020b, National Wetlands Inventory, accessed July 5, 2020, at <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.
- U.S. Fish and Wildlife Service (USFWS), 2020c, IPaC Resource List, generated December 23.

U.S. Fish and Wildlife Service (USFWS), 2021a, Regulations Governing Take of Migratory Birds: v. 86 FR 1134, no. 50 CFR 10, p. 1134–1165, accessed April 22, 2021, at Federal Register at <https://www.federalregister.gov/documents/2021/02/09/2021-02667/regulations-governing-take-of-migratory-birds-delay-of-effective-date>

U.S. Fish and Wildlife Service (USFWS), 2021b, Regulations Governing Take of Migratory Birds; Delay of Effective Date: Federal Register, v. 86 FR 1134, no. 50 CFR 10, p. 1134–1165., accessed April 22, 2021, at Federal Register at <https://www.federalregister.gov/documents/2021/01/07/2021-00054/regulations-governing-take-of-migratory-birds>.

Appendix A

Public Involvement

CONTENTS

- Notice of Availability Published in Kodiak Daily Mirror
- Distribution List
- Notice of Availability E-mail to Distribution List
- Comment Letter from U.S. Environmental Protection Agency

AFFP

Public Notice STATE OF ALASKA

Affidavit of Publication

STATE OF ALASKA }
COUNTY OF KODIAK
ISLAND BOROUGH }

SS

Kevin Bumgarner, being duly
sworn, says:

That he is Publisher of the
Kodiak Daily Mirror, a daily newspaper of general
circulation, printed and published in Kodiak, Kodiak Island
Borough County, Alaska; that the publication, a copy of
which is attached hereto, was published in the said
February 12, 2021

That said newspaper was regularly issued and circulated
on those dates.

SIGNED:

Kevin Bumgarner

Subscribed to and sworn to me this 12th day of February
2021.

Janet S. Baker, Notary Public,

Kodiak Island Borough County, Alaska

My commission expires: March 17, 2021

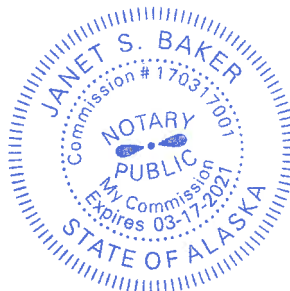
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Amy Summe
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PUBLIC NOTICE

The U.S. Coast Guard (USCG) announces the availability of a draft Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the National Historic Preservation Act, as amended. The EA evaluates the USCG's proposal to demolish two waterfront structures (the Marginal Wharf and the remnants of a seawater intake structure) at Base Kodiak on the Nyman Peninsula in Inner Womens Bay, Kodiak, Alaska. The EA identifies and examines the proposed action and no action alternatives, and assesses the potential environmental impacts of each. The existing facilities are derelict and obsolete and present hazards to the natural environment, navigation, and public health and safety. None of the facilities satisfy current or future planned USCG mission requirements.

To request a PDF of the draft EA be e-mailed to you, contact Amy Summe, Senior Biologist/Permit Specialist at Shannon & Wilson, ajs@shanwil.com. Please provide your comments by email to ajs@shanwil.com. Comments on the draft EA may be submitted during the 30-day public comment period starting February 19, 2021 and ending on March 22, 2021. Your comments will be considered in preparing the final EA.



E-MAIL NOTICE OF AVAILABILITY DISTRIBUTION LIST

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<i>Tribal Organization</i>		
Natives of Kodiak	Corey Gronn	info@nativesofkodiak.com
Sun'aq Tribe of Kodiak	Jeanine Marsh	ceo@sunaq.org
Tangirnaq Native Village	Gwen Sargent	info@woodyisland.com
Lesinoi, Inc.	Jana Turvey	jturvey@leisnoi.com
Koniag, Inc.	Tom Panamaroff	tpanamaroff@koniag.com , cpeterson@koniag.com
Alutiiq Museum & Archaeology Repository	Molly Odell	molly@alutiiqmuseum.org , patrick@alutiiqmuseum.org
The Native Village of Afognak		tribe@afognak.org
Afognak Native Corporation		lands@afognak.com
Old Harbor Native Corporation	Cynthia Berns	cberns@oldharbor.org
<i>State/Federal Agency</i>		
National Oceanic and Atmospheric Administration, National Marine Fisheries Service	John Kurland, Christopher Long	jon.kurland@noaa.gov , chris.long@noaa.gov
U.S. Department of Interior, U.S. Fish and Wildlife Service	Patrick Lemons, Douglass Cooper	patrick_lemons@fws.gov , douglass_cooper@fws.gov
U.S. Army Corps of Engineers, Alaska Regulatory Division	Andy Mitzel	Andy.Mitzel@usace.army.mil
Alaska Department of Fish and Game	Mark Minnillo	mark.minnillo@alaska.gov
Alaska Department of Environmental Conservation	Curtis Dunkin, Jan Palumbo	Curtis.dunkin@alaska.gov , Palumbo.jan@epa.gov , james.rypkema@alaska.gov , marty.parsons@alaska.gov
Alaska Department of Natural Resources	Marty Parsons	marty.parsons@alaska.gov
Kodiak Soil and Water Conservation District	Blythe Brown	blythe.brown@kodiaksoilandwater.org
Environmental Protection Agency	Karl Pepple, Betsy McCracken	mccracken.betsy@epa.gov , pepple.karl@epa.gov
Alaska - SHPO	Sarah Meitl	sarah.meitl@alaska.gov , oha.revcomp@alaska.gov
National Park Service	Janet Clemens	Janet_Clemens@nps.gov
<i>Local Government</i>		
Kodiak Island Borough		clerks@kodiakak.us
City of Kodiak		clerk@city.kodiak.ak.us
<i>Other Orgs</i>		
Kodiak Maritime Museum		info@kodiakmaritimemuseum.org
Kodiak History Museum		director@baranovmuseum.org

From: [Amy Summe](#)
To: [Amy Summe](#)
Subject: Kodiak Waterfront Demolition Projects - Notice of Availability of Draft Environmental Assessment
Date: Thursday, February 18, 2021 5:54:05 PM
Attachments: [image003.png](#)
[image005.png](#)
[image007.png](#)
[Kodiak Waterfront Demolition Projects - Draft EA 2.1.21.pdf](#)
[Notice of Availability - Kodiak Waterfront Demolition Projects EA.pdf](#)
[image004.png](#)
[image006.png](#)
[image008.png](#)

To whom it may concern:

On behalf of the U.S. Coast Guard, please find attached a Notice of Availability for a Draft Environmental Assessment for the Kodiak Waterfront Demolition Projects at U.S. Coast Guard Base Kodiak on Kodiak Island, Alaska. As indicated in the NOA and in the notice published on February 12, 2021 in the Kodiak Daily Mirror, a 30-day comment period has been established starting tomorrow. To facilitate review, the draft EA is also attached. Feel free to forward these documents to others who may be interested.

Thank you,

Amy Summe, PWS | Associate

Senior Biologist/Permit Specialist

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Seattle, Washington 98103

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**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

REGIONAL
ADMINISTRATOR'S
DIVISION

March 11, 2021

Nathan L. Rumsey
Commanding Officer
U.S. Coast Guard
P.O. Box 25517
Juneau, AK 99802

Dear Mr. Rumsey:

The U.S. Environmental Protection Agency has reviewed the U.S. Coast Guard Draft Supplemental Environmental Assessment for the proposal to demolish two waterfront structures at Base Kodiak on the Nyman Peninsula in Womens Bay, Kodiak, Alaska (EPA Region 10 Project Number: 21-0013-USCG). We are providing our comments pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act.

The Draft Supplemental Environmental Assessment evaluates potential environmental impacts associated with the proposed action and no action alternative. Under the proposed action, the USCG will demolish the Marginal Wharf and remnant concrete structures that supported the old power plant's seawater intake. Under the no action alternative, the existing facilities would continue to degrade without maintenance, posing risks to the environment, navigation, and human health and safety. EPA supports the proposed action to demolish both waterfront structures, while minimizing adverse impacts on environmental resources within the analysis area.

EPA recognizes the USCG's work with the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration to ensure the proposed action would avoid significant impacts or reduce potential impacts to less than significant levels. EPA recommends bolstering sections on air quality, environmental justice, and biological resources to further improve this assessment.

EPA appreciates the opportunity to review this Draft Supplemental Environmental Assessment. If you have questions about our comments, please contact David Magdangal of my staff at (206) 553-4044 or Magdangal.David@epa.gov.

Sincerely,

Rebecca Chu, Branch Chief
Policy and Environmental Review Branch

U.S. Environmental Protection Agency Comments on the Draft Supplemental Environmental Assessment for the Kodiak Waterfront Demolition Projects Kodiak, Alaska

Air Quality

Demolition of the 208 square foot building on Marginal Wharf triggers EPA's emission control requirements also known as "work practice standards". These requirements control asbestos emissions for demolition operations under the Asbestos National Emission Standards for Hazardous Air Pollutants (40 C.F.R., Part 61, Subpart M.). Any combined amount of regulated asbestos containing material of at least 160 square feet must comply with the emission-control requirements for demolitions. We therefore recommend disclosure of all procedures planned for asbestos emission control, including: (1) an analysis of a worst-case scenario involving an accidental release of all asbestos to air and/or water; (2) measures to mitigate such a release; and (3) plans for emergency response, public notification, and pollutant removal if such a release were to occur.

Environmental Justice

EJSCREEN¹ results indicate that a one-mile buffer around the project area is 6% under the age of five and is at the 99th national percentile. This means that 6% of the area's population is under the age of five and is an equal or higher percent than where 99% of the national population lives. Demographic indicators in EJSCREEN are a way to indicate which communities may be more susceptible to a given level of exposure to environmental pollutants. For example, children are often more vulnerable to pollutants than adults due to differences in behavior and biology, which can lead to greater exposure and/or unique windows of susceptibility during development. EPA recommends addressing the potential levels, risks, and routes of exposure to those under the age of five. We also recommend disclosing and discussing potential impacts to affected communities and solicit additional input from the public. The Final EA should identify who in the potentially impacted minority and/or low-income communities the agency communicated with and when the public became involved in the process.

Biological Resources

The proposed project may impact endangered, threatened or candidate species listed under the Endangered Species Act or the Marine Mammal Protection Act and their habitats. EPA finds the assessments of these resources to be clear and thorough; we also recognize the long-term beneficial impacts of removing the hazardous materials associated with the deteriorating Marginal Wharf and seawater intake from the ecosystem. We recommend including the final mitigation measures that have been decided upon once the Biological Assessment has been reviewed by the USFWS and NOAA Fisheries and their concurrence with your determinations has been accepted.

¹ <https://ejscreen.epa.gov/mapper/>

Appendix B

Agency ESA Concurrence Letters

CONTENTS

- NOAA Fisheries Concurrence Letter
- USFWS Concurrence Letter



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

March 26, 2021

CDR Nathan L. Rumsey
United States Coast Guard
Civil Engineering Unit-Juneau
P.O. Box 25517
Juneau, AK 99802

Re: Waterfront Demolition Project, Base Kodiak, Alaska, AKRO-2021-00401

Dear Commander Rumsey:

This letter responds to your request for concurrence from the National Marine Fisheries Service (NMFS) pursuant to Section 7 of the Endangered Species Act (ESA) and your request for consultation under Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) for the proposed demolition of the Marginal Wharf and Salt Water Intake Structure in Inner Womens Bay at Base Kodiak, Alaska. NMFS received an initial request for an expedited informal ESA consultation on February 24, 2021. NMFS provided the USCG with standard Marine Mammal Monitoring and Mitigation Measures applicable to the project on March 9 and the USCG confirmed on March 17 that these measures would be implemented.

Based on the inclusion of the NMFS-provided Marine Mammal Monitoring and Mitigation Measures, your request qualified for our expedited review and concurrence because it met our screening criteria and contained all required information on your proposed action, mitigation measures, and its potential effects to listed species and designated critical habitat. Expedited consultation for this proposed action commenced on March 17, 2021.

We reviewed your consultation request document and related materials. Based on our knowledge, expertise, and the materials you provided, we concur with your conclusions that the proposed action is not likely to adversely affect Mexico Distinct Population Segment (DPS) or western North Pacific DPS humpback whales (*Megaptera novaeangliae*), humpback whale proposed critical habitat, western DPS Steller sea lions (*Eumetopias jubatus*), or Steller sea lion designated critical habitat. A complete administrative record of this consultation is on file at the Juneau NMFS office.

Section 305(b) of the MSA requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS recognizes your determination in the BA that these actions can be successfully executed without significant adverse effects to EFH.

NMFS recognizes the determination that these actions will have 'no permanent adverse effect on EFH for GOA Groundfish and Salmon or their prey species' as a result of this project. The project plan described in section 2.2 Impact Minimization Measures offers numerous mitigation measures to minimize adverse impacts to EFH. NMFS acknowledges these measures and offers



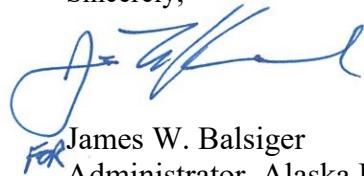
the following EFH Conservation Recommendations to avoid, minimize, mitigate, or otherwise offset effects as follows:

1. Follow Alaska Department of Fish and Game recommendations to conduct demolition when salmon migrations are not occurring.
2. Include an Oil Spill Prevention/Control plan and a plan for minimizing the spread of invasive species in the Environmental Protection Plan.
3. Ensure rock for rubble mound construction will be free of contaminants and invasive species.

Reinitiation of ESA consultation is required where discretionary federal involvement or control over the action has been retained or is authorized by law and if (1) take of listed species occurs, (2) new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered, (3) the action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this concurrence letter, or (4) a new species is listed or critical habitat designated that may be affected by the identified action (50 CFR 402.16).

Please direct any questions regarding this letter to Kathleen Leonard at Kathleen.Leonard@noaa.gov or (907) 271-5006.

Sincerely,



For James W. Balsiger
Administrator, Alaska Region

cc: Ian Putnam Ian.E.Putnam@uscg.mil



United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Anchorage Fish and Wildlife Conservation Office
4700 BLM Road
Anchorage, Alaska 99507



In Reply Refer to:
FWS/IR11/AFWCO

April 19, 2021

Mr. Ian Putnam
United States Coast Guard
Civil Engineering Unit
P.O. Box 25517
Juneau, Alaska 99502-5517

Subject: U.S. Coast Guard Kodiak Waterfront Demo (Consultation 07CAAN00-2021-I-0167)

Dear Mr. Putnam:

Thank you for requesting informal consultation with the U.S. Fish and Wildlife Service (Service), pursuant to section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq., as amended; ESA), by correspondence received February 24, 2021. The U.S. Coast Guard (USCG) proposes to demolish several in-water facilities at two sites on Base Kodiak in Womens Bay, Alaska. The USCG authorized Shannon & Wilson to prepare the associated biological assessment (BA) to evaluate potential effects of the project on ESA-listed species (Shannon & Wilson 2021). The USCG determined the proposed activities may affect, but are not likely to adversely affect the federally threatened Steller's eider (*Polysticta stelleri*), the federally threatened Southwest Alaska Distinct Population Segment (DPS) of the northern sea otter (*Enhydra lutris kenyoni*), or sea otter designated critical habitat.

The proposed project would demolish and remove from inner Women's Bay at Base Kodiak waterfront derelict in- and over-water structures that present navigation hazards, contain hazardous materials, present other human health and safety concerns, and no longer support Base Kodiak's mission. The two existing facilities are the Marginal Wharf, and the seawater intake, located at the western and eastern tips of the Nyman Peninsula, respectively.

Marginal Wharf

The Marginal Wharf was constructed in 1942 to assist World War II (WWII) Naval warfare operations and is in a state of severe deterioration. Demolition of the wharf would involve removal of all the over-water and in-water structures (remaining wharf structure and approximately 1,400 creosote-treated timber piles), and would require disposal of wharf-related debris in suitable landfills approved for hazardous materials. Accessible debris in the intertidal/beach area would also be removed if it can be extracted without disturbing the

substrate. All work would be conducted from barges or work boats and would follow the Best Management Practices (BMPs) for in-water work and pile removal. If needed, smaller landing craft would be used to ferry people and equipment between the shore and the offshore barge.

Seawater Intake

The seawater intake consists of a rectangular concrete structure housing a 30-inch-diameter concrete pipe that supplied a WWII electric power plant. A series of smaller concrete piers extended landward to the power plant, supporting a walkway that provided access from the plant to the intake. The concrete structures are severely deteriorated. This portion of the proposed project would include removal of the concrete intake structure and surrounding creosote-treated timber rub boards and the remaining concrete pile cap that is water ward of the high tide line. The removal of the deteriorated structures above the water line would expose a void in the intake that would be filled with approximately 6 cubic yards of crushed gravel. Anticipated equipment usage includes a barge, concrete saw equipment, diver support, and a small support skiff.

Project Timing

Project demolition is anticipated to occur primarily in the summer months but may start in late spring and continue into the fall. Marginal Wharf demolition is anticipated to take several months, depending on weather conditions and contractor schedule. The seawater intake demolition activity is anticipated to take less than a week. The removal of timber piles at Marginal Wharf and the demolition of the concrete seawater intake structure is expected to result in the periodic generation of underwater construction noise and temporary increases in suspended sediments which are likely contaminated with leached creosote components, which may affect Steller's eiders or sea otters.

Steller's Eiders

The range of Steller's eiders overlaps with the proposed project area. Activities, such as use of heavy equipment and pile driving, can cause in-water and airborne noise or increased turbidity to levels that could affect Steller's eiders. Steller's eiders are unlikely to be in the project area between May 1 and October 31. They are known to occur in nearshore waters of Kodiak Island and surrounding areas during winter, and there is a known concentration area of winter and molting distribution of eiders near Womens Bay.

To avoid adverse effects to Steller's eiders, the USCG will follow the Anchorage Fish and Wildlife Field Office Observer Protocols for Pile Driving, Dredging and Placement of Fill, (USWFS, 2012). They will establish an exclusion zone of a 328.1 feet (ft) radius centered on pile driving and removal activities in marine areas at or below the mean high tide (MHT) occurring between September 15 and April 1. A Protected Species Observer (PSO) will record observations of Steller's eider within the area and will meet the following requirements:

1. The PSO must be able to identify Steller's eider and be equipped with binoculars, rangefinder, two-way radio communication with the equipment operators, and logbook.

2. If a Steller's eider approaches the monitoring area, all construction work will be halted immediately; work may resume when the animal moves outside the monitoring area of its own accord.
3. The PSO will have the authority to stop construction work if a Steller's eider is observed approaching the exclusion zone.
4. The PSO will have no other primary duty than to watch for and report on events related to Steller's eider.
5. Within 60 days of completion of the Project, the USCG will report all Steller's eider PSO observations to Service. The report will include all Steller's eider sightings (or confirmation on the absence of sightings), estimated distance from Project operations, and any shutdown during construction activities due to eiders approaching the exclusion zone.
6. The PSO will work in shifts lasting no longer than 4 hours with at least a 1-hour break between shifts to reduce observer fatigue; work will either cease during the break or two observers will be employed to maintain continuous work; the Contractor may decide which method to use.

While there is potential for Steller's eider to be in the action area during construction, the USCG determined that proposed activities are not likely to adversely affect Steller's eider because a PSO will oversee work activities in marine area below the MHT and stop work if a Steller's eider approaches the 328.1 ft zone. In addition, any increases in turbidity that may affect eiders will be temporary, and will be minimized through the implementation of BMPs, as described in the impact minimization measures for in-water work, pile removal and installation, and disposal of piling, sediment, and construction residue in the BA.

Sea Otters and Sea Otter Critical Habitat

The range of the sea otter overlaps the proposed project area, and sea otters may be present in the area at any time of year. The Southwest Alaska DPS was listed as threatened under the ESA on August 9, 2005 (70 FR 46366). The Southwest Alaska DPS stock ranges from Attu Island at the western end of the Near Islands in the Aleutians, east to Kamishak Bay on the western side of lower Cook Inlet, and includes waters adjacent to the Aleutian Islands, the Alaska Peninsula, the Kodiak Archipelago, and the Barren Islands (70 FR 46366).

Northern sea otters occur in nearshore waters and are most commonly observed in waters up to 131.2 ft n depth, although they can be found in waters up to 328.1 ft deep. Shallow waters allow them access to subtidal and intertidal foraging habitats (Angliss and Lodge 2002; Service 2008). Activities such as those currently proposed, including use of heavy equipment driving piles into the sea bottom can cause in-water and airborne noise to a level that could adversely affect sea otters.

To avoid adverse effects to sea otters (and other marine mammals), the USCG will establish marine mammal monitoring areas that satisfy both Service and National Marine Fisheries Service (NMFS) requirements. Following protocols put forth by Service the project will establish exclusion zones centered on construction activity in marine areas at or below MHT

during pile driving and removal activities; these will be a 328.1 ft radius exclusion zone for sea otter. A PSO will record observations of marine mammals within the area and will meet the following requirements:

1. The PSO must be able to identify the designated wildlife and be equipped with binoculars, range-finder, two-way radio communication with the equipment operators, and logbook.
2. If a marine mammal approaches the exclusions zones, all construction work will be halted immediately; work may resume when the animal moves outside the exclusion zone of its own accord.
3. The PSO will have the authority to stop construction work if a marine mammal is observed approaching the exclusion zones.
4. The PSO will have no other primary duty than to watch for and report on events related to protected species.
5. Within 60 days of completion of the Project, the USCG will report all PSO observations to NMFS and the Service. The report will include all marine mammal sightings (or confirmation on the absence of sightings), estimated distance from Project operations, and any shutdown during construction activities due to marine mammals approaching the exclusion zones.
6. The PSO will work in shifts lasting no longer than 4 hours with at least a 1-hour break between shifts to reduce observer fatigue; work will either cease during the break or two observers will be employed to maintain continuous work; the Contractor may decide which method to use.

While there is potential for sea otters to be in the action area during construction, the USCG determined that the proposed activities are not likely to adversely affect sea otters because a PSO will oversee work activities in marine areas below the MHT and stop work if a northern sea otter approaches the 328.1 ft exclusion zone. In addition, any potential effects on water quality that may affect sea otters will be temporary and will be minimized through the implementation of appropriate BMPs as outlined fully within the BA.

Sea Otter Critical Habitat

The Service finalized designation of sea otter critical habitat on October 8, 2009 (74 FR 51988). In all, 5,854 square miles of critical habitat was designated for the threatened northern sea otter in southwest Alaska. The physical and biological features essential to conservation of the species, and which may require special management considerations, were identified as PCEs in the northern sea otter critical habitat rule (74 FR 51988). The PCEs identified for sea otter critical habitat are:

1. Shallow, rocky areas where marine predators are less likely to forage, which are generally waters less than 6.6 ft in depth;
2. Nearshore waters that may provide protection or escape from marine predators, which are those within 328.1 ft of the mean high tide line;

3. Kelp forests that provide protection from marine predators; kelp forests occur in waters less than 65.6 ft in depth;
4. Prey resources within the areas identified by PCEs 1, 2, and 3, that are present in sufficient quantity and quality to support the energetic requirements of northern sea otters.

Critical habitat for northern sea otters is divided into five Management Units (Units) corresponding to the recovery units listed in the Recovery Plan (Service 2013). The proposed project is located in Unit 5: Kodiak, Kamishak, Alaska Peninsula, with designated sea otter critical habitat extending from the “mean high tide line to the 65.6 ft depth contour as well as waters occurring within 328.1 ft of the mean high tide line” excluding “developed areas, such as piers, docks, harbors, marinas, jetties, and breakwaters” (74 FR 51988).

Effects of proposed project activities are expected to be temporary and minimal to PCEs for sea otters. The project features are located in shallow marine water adjacent to rocky shorelines (PCE 1) intermittently hardened by riprap. They are located in previously developed areas, and therefore excluded from the critical habitat designation. All construction activities would take place in nearshore waters within 328.1 ft of the MHT line (PCE 2). During the demolition process, in-water noise and increased turbidity may temporarily deter sea otter from using the immediate area. However, once the removal of the wharf and seawater intake structure are completed, this critical habitat type will be re-established within the current footprints of the structures. Submerged aquatic vegetation and kelp have been documented within the action area (PCE 3). The demolition of the wharf and seawater intake structure is not expected to disturb these habitat features, and it is anticipated that sea otters will have easier access to this PCE upon project completion. Elimination of the structures and overwater cover may allow for expansion of the current aquatic vegetation community. Any effects to prey resources (PCE 4) are anticipated to be insignificant and temporary. Impacts to critical habitat will be minimized through implementation of appropriate BMPs for in-water work, pile installation and extraction, and disposal of materials. Based on this analysis, the USCG determined that proposed activities are not likely to adversely affect sea otter critical habitat.

Conclusion

After reviewing the proposed project and evaluating its anticipated effects, the Service concurs with your determination that the proposed project is not likely to adversely affect, Steller’s eiders, northern sea otters, or northern sea otter critical habitat. Based on your request and our response, requirements of section 7 of the ESA have been satisfied. However, if new information reveals that project impacts may affect listed species or critical habitat in a manner or to an extent not previously considered, or if this action is subsequently modified in a manner which was not considered in this assessment, or if a new species is listed or critical habitat designated that may be affected by the proposed action, section 7 consultation should be reinitiated.

This letter relates only to federally listed or proposed species and/or designated or proposed critical habitat under jurisdiction of the Service. It does not address species under the

jurisdiction of the National Marine Fisheries Service, or other legislation or responsibilities under the Fish and Wildlife Coordination Act, Migratory Bird Treaty Act, Marine Mammal Protection Act, Clean Water Act, National Environmental Policy Act, or Bald and Golden Eagle Protection Act.

If you have questions or need more information please contact Ms. Libby Benolkin at 907-271-2768 or at elizabeth_benolkin@fws.gov and refer to consultation number 07CAAN00-2021-I-0167.

Sincerely,

Douglass M. Cooper
Branch Chief, Ecological Service

Literature Cited

- Angliss, R.P., and K.L. Lodge. 2002. Alaska marine mammal stock assessments, 2002. U.S. Department of Commerce, NOAA Technical Memo. NMFS-AFSC-133, 224 pp.
- Shannon & Wilson. 2021. U.S. Coast Guard Base Kodiak waterfront demolition projects, Kodiak Island, Alaska. Biological assessment. Prepared for U.S. Coast Guard. 39 pp + appendices.
- [USFWS] U.S. Fish and Wildlife Service. 2008. Stock assessment report. Northern sea otter (*Enhydra lutris kenyoni*): Southwest Alaska stock. August 1, 2008. <http://edocket.access.gpo.gov/2008/E8-17804.htm>.
- [USFWS]. 2012. Observer protocols for pile driving, dredging and placement of fill, Draft August 7, 2012. Anchorage Fish and Wildlife Field Office.
- [USFWS]. 2013. Southwest Alaska Distinct Population Segment of the Northern Sea Otter (*Enhydra lutris kenyoni*) - Recovery Plan. U.S. Fish and Wildlife Service, Region 7, Alaska. 171 pp.