U.S. Coast Guard (USCG) Finding of No Significant Impact (FONSI) for Waterways Commerce Cutter Homeport Facilities in St. Louis, MO

The United States Coast Guard (USCG) is proposing to construct waterfront improvements to provide a dedicated Homeport facility to support operations and maintenance for new purpose-built Waterways Commerce Cutters (WCCs) River Buoy Tender (WLR) variant in St. Louis, MO. The location of the Proposed Action is the USCG Base St. Louis located at 100 Arsenal Street, St. Louis, MO 63118. The site is home to an existing homeport for two legacy Cutters along the Mississippi River.

Summary of the results of the environmental impact evaluation: The Environmental Assessment (EA) prepared for this proposed project presents the purpose and need for the action, the Proposed Action and its alternatives, a description of the affected environment, and an analysis of direct, indirect, and cumulative environmental consequences. Based on the findings of the EA, the USCG concluded no significant impacts would result from the implementation of the Proposed Action or its alternatives.

No significant impacts have been identified; therefore, no specific mitigation commitments are required. However, the USCG would implement control measures for minimizing and containing turbidity and siltation; conform to all federal, state, and local requirements related to water resources and Waters of the United States; and conduct pre-clearance biological surveys to visually inspect structures for individual bats, birds, roosts, or nests prior to demolition activities as well as other special procedures identified in the Final EA. The USCG will refrain from in-stream work from March 1 to June 30 according to USFWS recommendation to avoid impacts during the primary time frame for fish spawning.

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

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

SPRINZL.RICHARD.ERIC.1618468743 Digitally signed by SPRINZL.RICHARD.ERIC.1618468743 Date: 2026.04.16 13:45:01 -04'00'

Date	Richard Sprinzl Environmental Reviewer	Environmental Engineer Title/Position	Level I NEPA Warrant Level

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

CARPENTER.GREGORY.O.1270979374 Digitally signed by CARPENTER.GREGORY.O.1270979374 Date: 2026.04.17 08:56:16 -04'00'

Date	Gregory Carpenter Senior Environmental Professional	Environmental Chief Title/Position	Level II NEPA Warrant Level

In reaching my decision/ recommendation for USCG's Proposed Action, I considered the information contained in this EA/FONSI and considered 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.

NAKAGAWA.ELIZABETH.GRUPP.1021781211 Digitally signed by NAKAGAWA.ELIZABETH.GRUPP.1021781211 Date: 2026.04.23 12:14:37 -04'00'

Date	Elizabeth Nakagawa Proponent	CDR/Commanding Officer Title/Position

FINAL
Environmental Assessment
US Coast Guard Waterways Commerce Cutter Homeport Facilities
St. Louis, Missouri

Prepared For:

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April 2026

ENVIRONMENTAL ASSESSMENT
Waterways Commerce Cutter Homeport Facilities - St. Louis, MO

The Final Environmental Assessment (EA) for the United States Coast Guard (USCG) Proposed Waterways Commerce Cutter Homeport Facilities in St. Louis, MO, has been 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 et seq., as amended by P. L. 118-5) and the Council on Environmental Quality Regulations (40 C.F.R. §§ 1500–1508) [1].

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

KAMINSKI.ANDREW.1271269249 — Digitally signed by KAMINSKI.ANDREW.1271269249 Date: 2026.04.16 13:32:32 -04'00'

Date	Andrew Kaminski Document Preparer	Senior Planner Title/Position

I reviewed the Final EA and submitted my written comments to the Proponent.

SPRINZL.RICHARD.ERIC.1618468743 — Digitally signed by SPRINZL.RICHARD.ERIC.1618468743 Date: 2026.04.16 13:43:00 -04'00'

Date	Richard Sprinzl Environmental Reviewer	Environmental Engineer Title/Position	Level I NEPA Warrant Level

I reviewed the Final EA and submitted my written comments to the Proponent.

CARPENTER.GREGORY.O.1270979374 — Digitally signed by CARPENTER.GREGORY.O.1270979374 Date: 2026.04.17 08:58:11 -04'00'

Date	Gregory Carpenter Senior Environmental Professional	Environmental Chief Title/Position	Level II NEPA Warrant Level

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

NAKAGAWA.ELIZABETH.GRUPP.1021781211 — Digitally signed by NAKAGAWA.ELIZABETH.GRUPP.1021781211 Date: 2026.04.23 12:15:28 -04'00'

Date	Elizabeth Nakagawa Proponent	CDR/Commanding Officer Title/Position

[1] In accordance with Executive Order 14154 Unleashing American Energy and the Council on Environmental Quality's February 19, 2025 memo on implementing the National Environmental Policy Act, the Coast Guard is voluntarily using the 2024 version of 40 CFR parts 1500–1508 and applying current Coast Guard procedures/regulations implementing NEPA to meet the agency's obligations.

U. S. COAST GUARD, WCC HOMEPORT ST LOUIS
ENVIRONMENTAL ANALYSIS
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APPENDICES

Appendix A Agency Correspondence
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LIST OF ACRONYMS AND ABBREVIATIONS

AoAPP	Analysis of Alternatives Planning Proposal
ATON	Aids to Navigation
BMP	Best Management Practice
CAA	Clean Air Act
CFR	Code of Federal Regulations
CG-BRG	Coast Guard Office of Budget and Resource Management
COMDTINST	Commandant Instruction
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FONSI	Finding of No Significant Impact
ICW	Intracoastal Waterway
ILSP	Integrated Logistics Support Plan
IW&WR	Inland Waterways and Western Rivers
MASI	Major Acquisition Systems Infrastructure
MAT	Maintenance Augmentation Team
MBTA	Migratory Bird Treaty Act
MDNR	Missouri Department of Natural Resources
MMPA	Marine Mammal Protection Act
MSOP	Missouri State Operating Permit
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
PAL	Provisionally Accredited Levee
PCB	Polychlorinated Biphenyl
PEIS	Programmatic Environmental Impact Statement
QA/QC	Quality Assurance/Quality Control
SHPO	State Historic Preservation Office
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
USACE	U.S. Army Corps of Engineers
USC	United States Code
USCG	United States Coast Guard
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VOC	Volatile Organic Compound
WCC	Waterways Commerce Cutter
WLI	WCC Inland Buoy Tender

WLIC	WCC Inland Construction Tender
WLR	WCC River Buoy Tender
WOTUS	Waters of the United States
WSDOT	Washington State Department of Transportation

1 INTRODUCTION

The United States Coast Guard (USCG) proposes to construct a dedicated Homeport facility to support operations for new purpose-built Waterways Commerce Cutters (WCCs) in St. Louis, MO. The location of the Proposed Action is the USCG Base St. Louis located at 100 Arsenal Street, St. Louis, MO 63118. The site is home to an existing homeport for two legacy Cutters along the Mississippi River and the Proposed Action will create dedicated USCG facilities for maintenance and homeporting of the WCCs. This EA summarizes the Proposed Action, Alternative Actions and No Action Alternative.

This Environmental Assessment (EA) is an evaluation of the potential environmental impacts of the proposed facility improvements at the USCG Base St. Louis. This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (Title 42 United States Code [USC], 4321, et seq.); the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA, at Title 40 of the Code of Federal Regulations (CFR), Parts 1500–1508; the Department of Homeland Security Management Directive 5100.1; and the USCG's implementing procedures for NEPA outlined in Commandant Instruction (COMDTINST) 5090.1. In accordance with Executive Order 14154 Unleashing American Energy and the Council on Environmental Quality's February 19, 2025, memo on implementing the National Environmental Policy Act, the USCG is voluntarily using the 2024 version of 40 CFR parts 1500–1508 and applying current USCG procedures/regulations implementing NEPA to meet the agency's obligations. Since the Proposed Action requires permits or approvals from federal, state and local agencies, this EA also includes discussion of topics relevant to compliance with those regulations, as applicable.

Through the EA process, the USCG will determine the potential for the occurrence of adverse environmental effects from implementation of the Proposed Action and its alternatives. This EA addresses the effects of construction and operation of the WCC Homeport at the project location. The process also serves as a method of informing the public about project alternatives and allows for public input on the Proposed Action. The results of the EA will determine if a Finding of No Significant Impact (FONSI) will be issued or if an Environmental Impact Statement is required.

1.1 MISSION

The USCG is this nation's first and oldest maritime agency. The USCG is a multi-missioned military and maritime service within the Department of Homeland Security. The USCG's five fundamental missions are maritime safety, maritime security, maritime mobility, national defense, and protection of natural resources. Specific to this Proposed Action, the USCG has a statutory mission to establish, maintain, and operate aids to navigation (ATON) in the Inland Waterways and Western Rivers (IW&WR) which includes the Gulf and Atlantic Intracoastal Waterway (ICW); the Mississippi, Missouri, Alabama, Tennessee, Columbia, and Ohio Rivers, and several other navigable waterways around the US, among the other fundamental mission sectors.

1.2 PROJECT BACKGROUND

The USCG is undertaking a major recapitalization effort to modernize its fleet, aircraft, boats, and supporting communications systems. As part of this effort, the USCG created the WCC Acquisition

Program intended to replace the USCG's existing aging inland tender fleet with next-generation River Buoy Tenders (WLRs), Inland Construction Tenders (WLICs), and Inland Buoy Tenders (WLIs) that provide improved endurance, speed, deck capacity, crew accommodations and habitability. These cutters will be critical to maintaining more than 28,000 aids to navigation across U.S. rivers, lakes, intracoastal waterways, and harbors, while also supporting the USCG missions in security, search and rescue, marine safety, and environmental protection.

The commissioning and operation of these next-generation WCCs within the IW&WR of the U.S. was previously analyzed under a separate NEPA-compliant Programmatic Environmental Impact Statement (PEIS) (USCG 2022). The PEIS determined that implementation of the WCC Acquisition Program would not be expected to significantly contribute to cumulative impacts on species, critical habitat, the environment, or socioeconomics. Shore facility requirements for homeporting new vessels are identified through the Cutter Homeport Decision Process and documented in each vessel program's Integrated Logistics Support Plan (ILSP). Candidate homeports are evaluated on mission needs, proximity to operating areas, logistics support, personnel services, infrastructure costs, and environmental impacts.

Supporting infrastructure for the newly acquisitioned WCCs is being delivered through the Major Acquisition Systems Infrastructure (MASI) Program, which ensures that new USCG assets are backed by the facilities needed for efficient operations and sustainment. MASI projects may involve constructing new facilities, renovating or reconfiguring existing ones, and demolishing outdated structures. They also require feasibility studies, environmental reviews, and business case analyses to guide decisions on homeports and long-term support requirements (USCG 2025). Based on the homeporting feasibility studies conducted, St. Louis was selected as the designated homeport for 2 newly acquisitioned WCC-WLRs and recipient of designated MASI Program funding to complete necessary infrastructure improvements. Therefore, this EA tiers from the previous PEIS for the WCC Acquisition Program and by evaluating the specific homeport development elements and Proposed Action in St. Louis, Missouri (USCG 2022).

1.3 Purpose and Need of the Proposed Action

The purpose and need of the Proposed Action is to establish facilities in St. Louis that will provide two homeport berths and one maintenance berth, ensuring the Coast Guard can immediately support the operational requirements of the incoming WCCs while phasing out legacy cutters.

The need for the proposed action is based in the constraints of the current homeport and depot level maintenance facilities in St. Louis to meet the loading requirements of the new WCCs and required dock frontage to moor the WCCs safely under all conditions. The project is proposed to be completed in two phases. An Initial Operational Capability (IOC) phase includes upgrades to electrical and utilities at the existing Arsenal St. Base St. Louis site to provide minimally capable berths for the new WCCs. The subsequent Full Operational Capability (FOC) will extend the moorings to include three dedicated berths for the two new cutters and one for maintenance. This document assesses the potential effects of both phases.

1.4 Location and Site Description

The proposed project location is St. Louis, Missouri, along the Mississippi River. St. Louis has a unique position as a critical maritime hub and homeport dedicated to USCG facilities and a range of activities

supporting national security and commerce. St. Louis is an existing homeport to two (2) legacy Cutters, Coast Guard Cutter (CGC) CHEYENNE and CGC GASCONADE, and will also be a designated location for WCC maintenance, and the homeport of the newly delivered WCC's.

Figure 1-1: Project Location Map, St. Louis MO

1.5 Regulatory Framework

This EA was undertaken under application of criteria considerations and in compliance with the NEPA. In addition, the USCG's implementation of NEPA is guided by COMDTINST 5090.1(series) (*Environmental Planning Policy*) and associated Environmental Planning Implementing Procedures. These federal regulations establish both the administrative process and the substantive scope of the environmental impact evaluation, which is designed to ensure that deciding authorities have a proper understanding of the potential environmental consequences of a contemplated course of action. In addition to NEPA, the Council on Environmental Quality NEPA regulations, and USCG NEPA regulations, this EA considers all applicable laws, regulations, and executive orders including the following.

- Clean Air Act (CAA)

- Clean Water Act (CWA)
- Coastal Zone Management Act (CZMA)
- Endangered Species Act (ESA)
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act (MBTA)
- Marine Mammal Protection Act (MMPA)
- National Historic Preservation Act (NHPA)
- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Toxic Substances Control Act
- EO 11988, Floodplain Management
- EO 11990, Protection of Wetlands
- EO 13045, Protection of Children from Environmental Health Risks and Safety Risks

1.6 PUBLIC AND AGENCY INVOLVEMENT

Table 1 below lists the agencies that were invited to participate as cooperating agencies in the NEPA process for this Proposed Action. The agencies' reasons for involvement will be listed. The table will be updated as necessary following coordination with the agencies. Nonregulatory stakeholders that may be interested in the Proposed Action would be included via public notice.

Table 1: Cooperating Agencies

Agency	Responsibilities	Regulatory Authority
United States Army Corps of Engineers (USACE)	- Section 404 permitting for construction and pile driving activities per the Clean Water Act	Clean Water Act (Section 404) Rivers and Harbors Act (Section 10)
U.S. Fish and Wildlife Service (USFWS)	- Consultation for potential impacts on terrestrial and freshwater endangered species and critical habitats	Endangered Species Act (Section 7)
U.S. Environmental Protection Agency (EPA)	- Review of water quality and environmental impacts to ensure compliance with Section 404(b)(1) guidelines	Clean Water Act
State Historic Preservation Office (SHPO)	- Review of potential impacts on historical and archaeological resources	National Historic Preservation Act (Section 106)

A list of agencies consulted during the preparation of this EA is presented in Section 7, Consultation with Regulatory Agencies and List of Agencies Contacted. Copies of agency consultation letters and correspondence with interested parties received to date are provided in Appendix A.

The USCG prepared a DRAFT EA and to solicit comments from federal, state, and local agencies and the public in order to consider and evaluate the impacts of the Proposed Action.

The USCG, as the proponent, published a Notice of Availability (NOA) of the DRAFT EA and notified agencies listed above via emailed NOA letter on January 12, 2026. The DRAFT EA was available for public and agency comment on the USCG Office of Environmental Management's Environmental Planning

Website from January 5, 2026, until the comment was stated to close on February 13, 2026. No public comments were received on DRAFT EA.

The project will complete the NEPA process with issuance of a FONSI. Coordination under the Endangered Species Act, including receipt of a concurrence letter from USFWS, has been finalized as part of this process (Refer to Section 5.1). The concurrence determination will be provided to the U.S. Army Corps of Engineers to support their subsequent permitting decision under the Clean Water Act. The USACE permit application will be submitted and coordinated following completion of NEPA and prior to construction of the Proposed Action.

2 PROPOSED ACTION AND ALTERNATIVES

Pursuant to NEPA, governmental decision-makers must consider a range of reasonable and practicable alternatives to a proposed action that would result in a significant environmental effect. A reasonable alternative is defined by the below criteria:

- Satisfy the Project purpose and need, and objectives, as defined in Section 1.3 – Project Purpose and Need;
- Technically and economically feasible;
- Would result in an acceptable return on the investment; and,
- Would result in the Least Environmental Damaging Practicable Alternative (LEDPA)

The alternative's screening process was conducted to determine which alternatives would fulfill the objectives for homeporting capabilities at the USCG facility while minimizing environmental impacts. In order to be considered as a practicable option, the USCG considered the alternatives following project-specific selection criteria:

1. Meets the purpose and need of the Proposed Action to provide homeport facility for 2 WLRs and one dedicated maintenance berth.
2. Maximizes use of funding and effectiveness and meets delivery schedule; the preferred alternative provides the most meaningful and efficient improvements with the overall intent of the Proposed Action in mind to meet the delivery schedule of the new WCCs.
3. Provides the best use of existing infrastructure,
4. Minimize disruptions to existing operations;
5. Consistent with current site use and operations;
6. Minimizes environmental hazards and risks;
7. Minimizes impacts to environmental resources;

As part of the WCC Program, the USCG conducted a Homeporting Feasibility Study, led by CG-932 MASI (US Coast Guard 2022), to identify suitable locations for new cutter homeports. The Homeporting Feasibility Study identified two (2) feasible alternatives for the homeporting of two (2) WLR Cutters and an upgraded maintenance facility and berth. Two main site locations were evaluated for the St. Louis Homeport Project to provide the necessary facilities to homeport the new WCCs:

- Base St. Louis waterfront located at 100 Arsenal Street, St. Louis, MO 63118 (Arsenal Street) and,
- Coast Guard Old Base St. Louis at 120 Iron Street, St. Louis, MO 63111 (Iron Street).

The USCG analyzed these alternative locations within the St. Louis area to determine the optimal project location and design that would fulfill the Proposed Action purpose and need while minimizing impacts at the selected location. The alternative's screening process was used to reduce the number of alternatives considered during more-detailed evaluations based on their ability to fulfill the requirements set forth in the selection criteria.

The sections below give an overview of the two location alternatives based on preliminary work from the WCC Homeporting Feasibility Study and Analysis of Alternatives Planning Proposal (AoAPP) performed by contract engineer for the Proposed Action and evaluates each location alternative based on how they meet the selection criteria presented. Table 2 presents the alternative site evaluation.

Figure 2-1: Alternative Site Location Map

2.1 PROPOSED ACTION

The Proposed Action includes the following components to be constructed at the project location:

- Upgrades to electrical and utilities (water, sewer, and fiber);
- New crane and added crane foundation on the existing pier to support the existing maintenance facility;
- Install new 36-inch piles to support crane foundation; Add fixed trestle and articulating ramp to new floating docks;
- Extend existing roadway to south to the location of the new trestle;
- Replace in-kind floating dock at the maintenance facility (225 linear feet);
- Replace in-kind the personnel walkway (gangway) at the existing floating dock;
- Install 10 new mooring piles with 36-inch diameter plumb and 2 new 30-inch diameter batters at each mooring piles; and,
- Install new wider floating dock (40 feet wide by 515 linear feet).

The project is proposed to be completed in two distinct phases, an Initial Operational Capability (IOC) and a subsequent Full Operational Capability (FOC). The IOC phase includes upgrades to electrical and utilities at the existing Arsenal St. Base St. Louis site to provide minimally capable homeport and maintenance berths for the new WCCs while continuing to support existing maintenance operations and the two currently homeported cutters. Because the Proposed Action includes basic infrastructure upgrades to the

existing waterfront facilities at the Arsenal St. Base St. Louis Facility, it was decided that there were no feasible alternatives to consider for these components of the Proposed Action.

The two alternative site locations discussed below were therefore evaluated for their ability to meet the selection criteria for the proposed FOC components of the Proposed Action. However, because the full project will be constructed under the MASI Program, the IOC and FOC project impacts must be assessed collectively. The Environmental Assessment herein includes assessment of impacts from the full project, including all IOC components and facility upgrades at Base St. Louis and new FOC installations collectively. Note again, that the recommended FOC solution will expand the current moorings at the current Base St. Louis location.

2.2 No Action Alternative

The USCG considered the no action alternative. Currently two WLRs are homeported at the existing waterfront Base St. Louis waterfront facility. Operations at the existing waterfront facility indicate the waterfront moorings and upland mission support facilities are constrained. Currently the homeported cutters are rafted on the south berth of the floating dock with CGC GASCONADE moored outboard of CGC CHEYENNE. The North berth is devoted to visiting cutters for dockside maintenance at the maintenance facility and berth. There is not enough frontage on the existing floating dock to moor 3 WCCs, 2 homeported cutters and maintenance berth. Therefore, cutters will need to raft and/or shift moorings when a cutter is in port for a dockside maintenance period at the maintenance. Furthermore, the existing floating dock does not meet the loading requirements of the newly proposed WCCs. As such, the no action alternative does not fulfill the Proposed Action's purpose and need (selection criteria 1) and therefore was not considered a practicable alternative or selected for further evaluation. Refer to Figure 1-1 showing the location of the Base St. Louis existing facilities and Figure 2-1 showing the existing site plan, or the no-action alternative.

2.3 Base St. Louis Waterfront - Arsenal Street.

Base St. Louis at 100 Arsenal Street is located concurrent with the U.S. Army Corp of Engineers (USACE) property and waterfront facilities, as the property is currently leased from the USACE by the USCG. The USCG facilities are located at the waterfront, on the southwest side of the property. The marine facilities consist of a 225-ft x 35-ft fixed pier, a 15-ft wide access bridge connection to shore, and a 450-ft x 20-ft floating dock held in place with steel pipe guide piles. The facility is approximately 25 years old but is overall in good condition. The property to the southwest of the USCG berth is currently utilized as a barge fleeting area by another user and is near the USCG floating docks. The site currently accommodates two legacy cutters, the CGCs CHEYENNE and GASCONADE, which will be replaced with the incoming WCC Cutters. CGCs CHEYENNE and GASCONADE are 75-foot-long tenders with 99- and 90-foot-long barges, respectively, responsible for maintaining ATONs along their Area of Operations (AOO) ranging from the Upper Mississippi River (IL to MO) and Kaskaskia River (IL), and along the Missouri River up to Sioux City, IA, respectively. In addition, the existing site has a maintenance facility on the northeast slip of the site. Currently, when a vessel is in for maintenance at the maintenance berth, the site is restricted to one operational berth requiring rafting / shifting of vessels for operations. Existing infrastructure at this site can be used for the Proposed Action with some upgrades to existing utilities and cranes at the maintenance facility.

The Proposed Action located at Arsenal Street would include the upgrades to the maintenance facility, and installation of new components to support the expansion of existing infrastructure and the homeporting of the two newly acquired WCCs. The operational depth at the current mooring location at the Base St. Louis facility exceeds 10ft; therefore, no dredging is anticipated as part of this project.

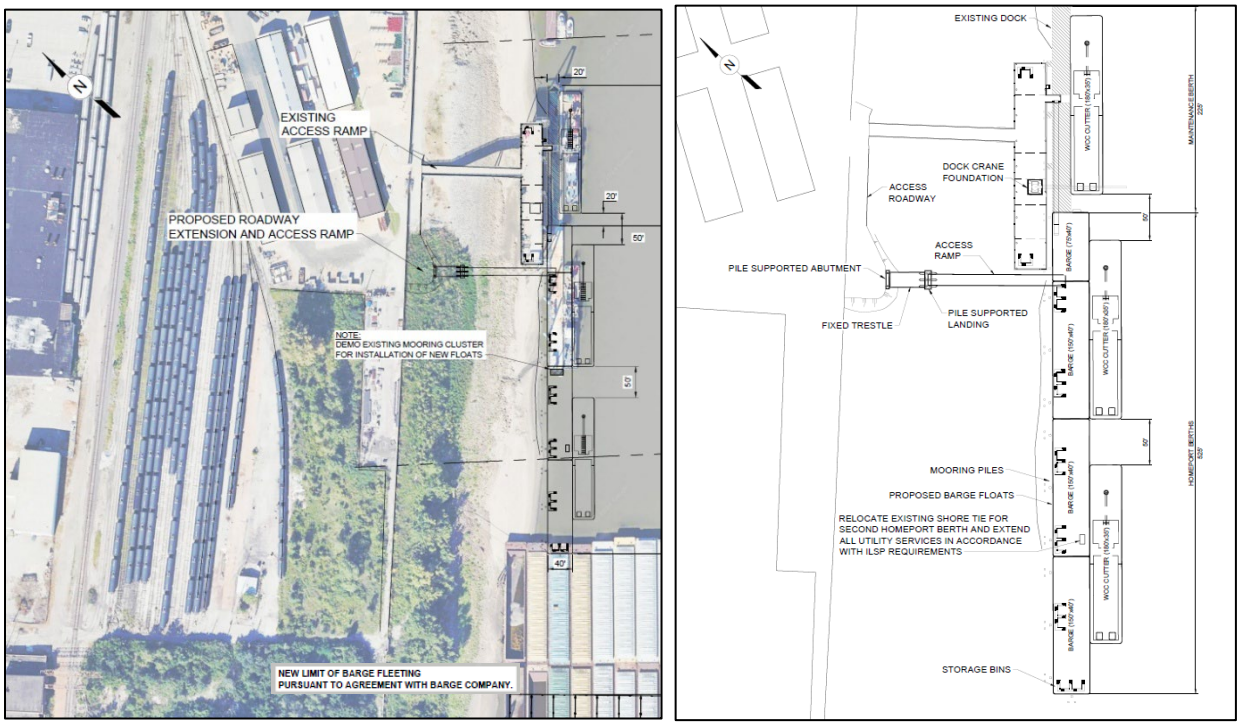

Figure 2-2: Arsenal Street Alternative- Plan View

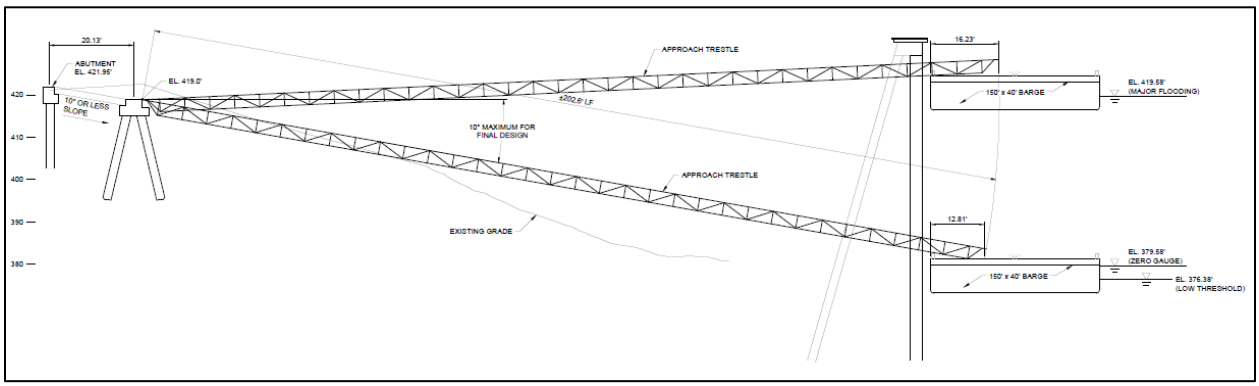

Figure 2-3: Arsenal Street Alternative- Fixed Trestle Profile View

2.4 Coast Guard Old Base St. Louis - Iron Street.

The Coast Guard Old Base St. Louis (OBSL) located at 120 Iron Street, formerly known as Base St. Louis, is a USCG-owned site that is located approximately 4-miles southeast of the Arsenal Street site along the Mississippi River. The "Iron Street" site is bounded on the north by Alumax aluminum metal fabricators, on the west by railroad tracks and Southern Metals processing facility, and to the south by Brenntag, a

specialty chemical manufacturer/distributor. Currently the property is abandoned and has known environmental contamination from the adjacent property's chemical storage facility. There is an existing loading platform that consists of two levels. Recent site inspection reports indicate that the platform is aged and in poor condition and cannot be utilized for waterfront activities in its current state. There are no existing waterfront facilities at the site that could be utilized for the incoming WCC Cutters. The chemical storage facility has a small floating barge dock along its waterfront, and the packaging company does not currently have any waterfront infrastructure.

The Proposed Action located at Iron Street would include construction and installation of two new WCC homeport/operational berths for the new WCCs via floating dock structure held in place with new mooring piles, a shore connection trestle that can accommodate driving on and off the floating dock with a telehandler for operations, and storage bins. The site development at Iron Street would also require construction of parking, electrical system, site lighting, utility connections, upland site civil work to elevate the developed portion of the site above the flood elevation along with a new roadway into the site, and upland infrastructure to support the docks operations. While the Iron Street alternative can provide two (2) dedicated homeport berths, it cannot support both homeport and maintenance operations and would split operations between two sites. In addition to the development at the Iron Street site, the maintenance improvements at Arsenal Street are also required and included in this option. Developing this site location for the Proposed Action would ease congestion at the Base St. Louis Waterfront facility and allow space for a dedicated cutter depot level maintenance berth.

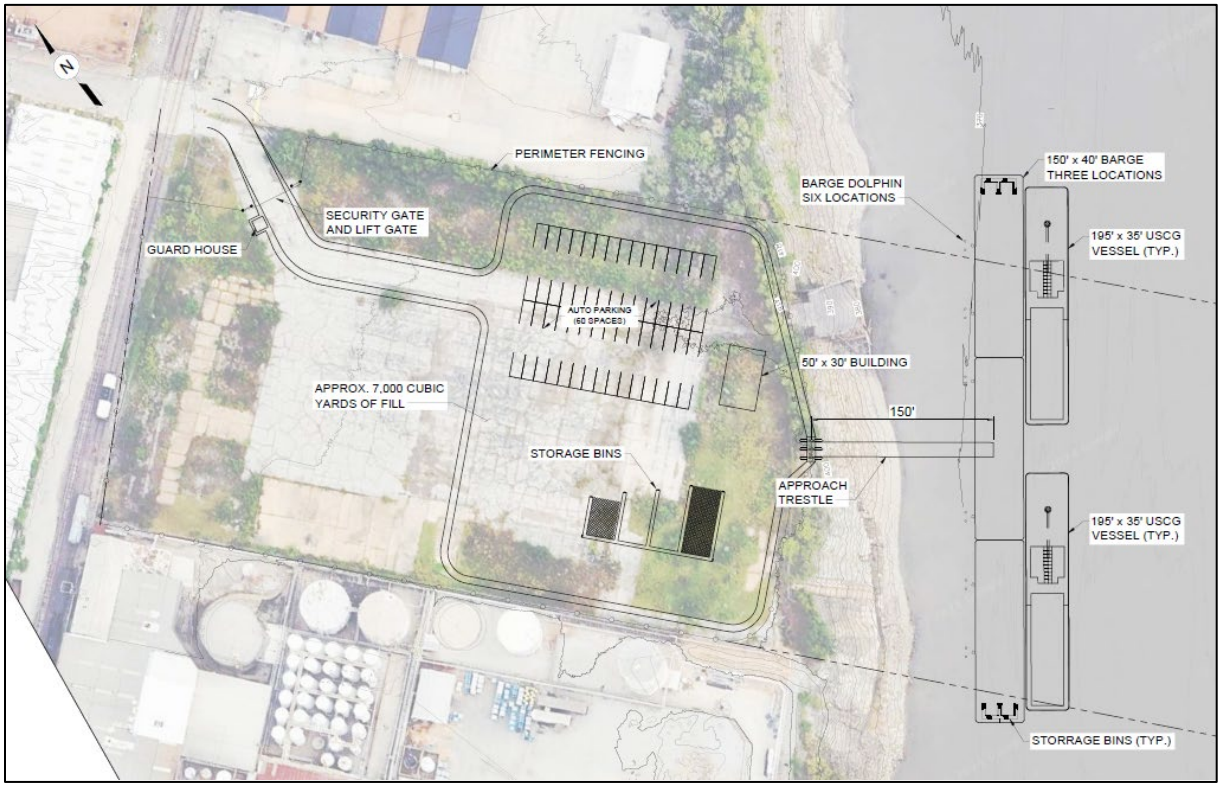

Figure 2-4: Iron Street Alternative- Plan View

2.5 EVALUATION OF ALTERNATIVES

The alternatives were both determined to meet the purpose and need of the Proposed Action which is to provide homeport facility for 2 WLRs and one dedicated maintenance berth. However, the development of the Arsenal Street site can meet the Proposed Action purpose and need on its own, while the use of Iron Street would also necessitate some improvements at the existing maintenance facility at Arsenal Street.

The location that maximizes use of funding and effectiveness and best meets delivery schedule is the Arsenal Street location. The development of the new WCC berths at Arsenal Street would build upon the maintenance facility improvements already made, therefore more efficiently utilizing funds and reducing overall schedule. Development of Arsenal Street also makes the best use of existing infrastructure by providing a scalable solution from the maintenance improvements to the expansion of the WCC docks. The development of the Arsenal Street alternative keeps the unit in one location with two (2) homeport berths and a maintenance berth in one location, as well as providing improved operational efficiency to the existing site.

There would be disruptions and impacts to current operations at the Arsenal Street location during construction of the new facilities. In particular, the waterfront improvements associated with Arsenal Street, floating equipment, pile driving, float installation and replacement, new crane installation, power improvements, etc. will all have an impact and disruption to existing site operations. The efforts will need to be planned and phased to minimize disruptions to existing operations via scheduled outages. Additionally, due to limited upland space and the property being leased from the USACE, upland building improvements and parking cannot be accommodated. Development of the Iron Street location would result in less impacts to current operations and would allow for more usable upland space for parking and building construction to support the operations of the new cutters. However, development of the Arsenal Street location is consistent with current site use and operation where Iron Street would shift operations for the new WCC's to Iron Street, while keeping the legacy cutters at Arsenal Street along with the maintenance. Current Legacy Cutter homeport operations and maintenance operations are at Arsenal Street, meaning operations personnel are familiar with the site, navigation to and from the site, and the USCG would benefit from all the existing infrastructure onsite. Alternatively, Iron Street would require improvements and construction activities at two different sites, which would prolong the construction period and require significant investments at two different properties. The internal feasibility study and engineering analysis contracted by the USCG further expand on technical engineering and navigation constraints at the Iron Street location which influences the conclusion that the Iron Street alternative is not operationally preferrable to Arsenal Street.

Both alternatives are located on the western shore of the Mississippi River, within 4 miles of each other and within the same general environmental setting. For this reason, impacts to natural resources would differ primarily due to direct impacts from the Proposed Action footprint. Arsenal Street requires overall less new infrastructure due to the use of existing facilities which reduces construction footprints and associated impacts. Additionally, operations at Arsenal Street are currently in line with the Proposed Action and future use of the site which reduces potential for introduction of new impact causing factors from the operation of the facility and new presence of WCC in the riverine area.

Environmental hazards would be significant at the Iron Street location alternative. The site's contamination history may inhibit or restrict development of the site. Extensive environmental review,

sampling, and potential mitigation of contamination may be required which could jeopardize overall timeline and efficient use of available MASI funding. Numerous environmental actions have been completed at Old Base St. Louis since 1991, including: Underground storage tank (UST) removals; Phase I and Phase II Environmental Site Assessments; soil, groundwater, surface water, and sediment sampling investigations; a Remedial Investigation/Feasibility Study (RI/FS); Environmental Baseline Survey (EBS) that summarized all previous investigation results, and most recently a Site Investigation and soil analysis. The EBS concluded that the vast majority of environmental issues at the site are related to the neighboring Brenntag, facility. Brenntag is under a consent order with the State to remediate volatile organic compound (VOC)-impacted groundwater at their facility as well as at the USCG property. Based on the Environmental Baseline Survey in 2011 and subsequent site investigation in 2021, the site routinely stored oily bilge water and other hazardous materials such as waste paint, empty paint containers, spent solvents, gasoline, and used oil at a HAZMAT storage building and boat storage building and the site previously contained a 2000-gallon underground storage tank for fuel (AMEC 2010; Endpoint Solutions 2021). Sampling of the soil onsite indicated relatively low concentration VOC and SVOC contaminants are present, as evidenced by the concentrations of benzene, benzo(a)pyrene and dibenzo(a,h)anthracene which were detected in the samples collected from the former HAZMAT storage building area. Additionally, petroleum contamination (benzene, toluene, ethylbenzene, and xylenes (BTEX); total petroleum hydrocarbons–gasoline range organics (TPH-GRO), diesel range organics) was detected in the soils adjacent to the former UST system. Analytical results from the soil samples collected during this investigation indicate multiple constituents with concentrations that exceed the Lowest Default Target Level for All Soil Types and All Pathways; however, none of the contaminants were identified in excess of their Tier 1 Risk-Based Target Levels. The adjacent property to the Iron St. location (owned by Brenntag) is undergoing groundwater remediation for contamination (Arcadis 2021). A network of groundwater sampling wells exists throughout the Brenntag property and the Old Base St. Louis site for which recent sampling indicates higher than background concentrations of SVOCs, VOCs, and metals (including arsenic) within the groundwater at the Iron St. site. Placing occupied buildings on the site, as would be proposed for a facilities operations building (Figure 2-3), would create a risk of vapor intrusion from the documented contaminated groundwater plume. Assessing this vapor intrusion risk and including mitigation methods such as advanced engineering, remediation, or building sealants to meet US EPA regulations for human health and safety would add to project cost and complexity at the Iron St. site.

Table 2 below summarizes the Evaluation of Alternatives.

Table 2: Summary of Evaluation of Alternatives

Selection Criteria	Arsenal Street	Iron Street
Meets the purpose and need of the Proposed Action to provide homeport facility for 2 WCC-WLRs and one dedicated maintenance berth.	Yes	Yes, if IOC at Arsenal is also completed.
Maximizes use of funding and effectiveness and meets delivery schedule	Yes	No
Provides the best use of existing infrastructure	Yes	No

Minimize disruptions to existing operations	No	Yes
Consistent with current site use and operations	Yes	No
Minimizes environmental hazards and risks	Yes	No
Minimizes impacts to environmental resources	Fewer perceived impacts	More perceived impacts
Preferred Site Alternative	YES (6)	NO (2)

(score) is based on number of criteria met

Based on the assessment of the site alternatives presented above, the Arsenal Street location was selected as the preferred project site location and carried forward for further evaluation in the EA. The Iron Street location was deemed not practicable due to the limitations summarized above and was therefore not considered for further analysis in this EA.

2.6 CONCLUSION

The preferred alternative project is the Arsenal Street development. Therefore, the Proposed Action is the development of waterfront facilities at Arsenal Street to support the homeporting of 2 WCCs and improvement of the existing maintenance facility. The EA presented in Section 3 evaluates the preferred alternative (Arsenal Street Development) and the no action alternative. The No Action Alternative is evaluated to provide a baseline for comparison with the Proposed Action. The No Action Alternative identifies and describes the potential environmental impacts of the status quo (*i.e.,* if the Proposed Action were not implemented).

3 ENVIRONMENTAL ASSESSMENT

This EA considers the Proposed Action and evaluates potential environmental impacts to those environmental resources that would likely be affected by implementation of the Proposed Action.

The affected environment sections provide an environmental baseline of each resource category and the conditions on, and next to, the project site at the time this document was prepared. The regulatory framework of applicable laws, ordinances, regulations, and guidance pertinent to the resource category is also presented, where appropriate.

The environmental consequences discussion provides an analysis of the potential adverse and beneficial environmental impacts that could result from implementing the alternatives. Direct, indirect, and cumulative impacts are analyzed for each resource. Direct impacts are caused by the Proposed Action, occur at the same time, and place as the Proposed Action. Indirect impacts are caused by the Proposed Action and occur later in time or are further removed in distance but are still reasonably foreseeable. Cumulative impacts result from the incremental impact of the Proposed Action when added to other past, present, reasonably foreseeable future actions, regardless of what agency or entity undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over time. These cumulative impacts are discussed in Section 3.9.

3.1 SCOPE OF THE ENVIRONMENTAL ASSESSMENT

This section describes pertinent existing environmental conditions for resources potentially affected by the Proposed Action and identified alternatives. In compliance with NEPA and Environmental Planning Policy COMDTINST 5090.1(series) and associated Environmental Planning Implementing Procedures, the description of the affected environment focuses on only those aspects potentially subject to impacts.

The following resources were considered but are not addressed in the detailed impact analysis because the resources are not present in the project area: agricultural lands and forest resources, tribal lands and resources, and mineral resources. In addition, based on the limited nature of work that will occur under the Proposed Action, and because the project site is confined to a small area entirely within the federally controlled Base St. Louis facility, there will be no adverse impacts on population and housing, public services (fire protection, police, schools, and parks), or recreation.

The resources discussed in the sections that follow are:

- Biological Resources
- Cultural and Historic Resources
- Air Quality
- Geology, Topography, and Soils
- Noise
- Water Resources
- Transportation, Navigation, and Access
- Land Use, Surrounding Land Use, and Zoning Analysis

Environmental resource areas expected to experience no or negligible impacts from the Proposed Action are not examined in detail. Implementation of the Proposed Action is not anticipated to result in impacts to airborne noise, socioeconomics, hazardous materials, waste, human health and safety, groundwater and soil contamination, or public services and utilities. A brief description of each resource area follows:

Airborne Noise

Construction activities would generate temporary noise from standard equipment, including heavy haul trucks, crane barges, and tugboats, typically during weekday daytime hours. Noise levels would be consistent with the existing ambient environment, influenced by current operations at the USCG facility and vessel traffic on the Mississippi River. Routine vessel operations, maintenance, training, lodging, and recreational activities would similarly remain consistent with existing noise levels. Construction-related noise would be intermittent and temporary, not exceeding significance criteria.

Socioeconomics

The Proposed Action will replace legacy cutters with newly acquisitioned WCCs and will not provide any substantial increase in workforce, job opportunity, or revenue generating business. Construction activities would generate short-term employment and spending, providing minor benefits to the local economy. However, these effects would be negligible at the regional scale and therefore are not assessed in the EA.

Hazardous Materials, Waste, Human Health and Safety

Because the alternative of the Iron Street location was deemed to not technically be practical and was not carried forward for further analysis in this EA, impacts to or from hazardous materials, waste and human health were not extensively evaluated. Development of the Proposed Action at the pre-existing Arsenal Street facility would not create any new hazardous materials, waste, or human health and safety risk beyond standards for waterfront construction and operation activities that are already occurring. No dredging or removal of sediments from the project area are proposed as part of this project. Therefore, any risk of the Proposed Action impacting these factors is considered negligible.

Groundwater And Soil Contamination

Because the project alternative of the Iron Street location was deemed to not technically be practical and was not carried forward for further analysis in this EA, impacts to groundwater and soil contamination would not occur and were not evaluated. Minimal ground disturbing activity is proposed with the construction of the Proposed Action including pile driving of new mooring piles at the pre -existing Arsenal Street location facility where extensive geotechnical investigation supports the engineering and construction of mooring piles. No dredging or removal of sediments from the project area are proposed. Therefore, any risk of the Proposed Action impacting groundwater and soil contamination is negligible.

Public Services and Utilities

Personnel levels at USCG facilities would see minimal change, with the replacement WCC-WLR expected to have a crew complement similar to the current WCCs. No long-term increases in demand for police, fire, recreation, or schools are anticipated. Utility services—including electricity, water, sanitary sewer, and communications infrastructure—would be repaired or improved at the existing facility. Construction would follow standard design requirements to avoid interrupting existing services. Overall, utility impacts due to construction are expected to be negligible. In addition, the proposed facilities are not expected to

result in a substantial increase in utility demands over existing conditions and there would be no significant impacts.

3.2 PROJECT AREA DESCRIPTION

USCG Base St. Louis at 100 Arsenal Street is adjacent to the USACE property and waterfront facilities located on the southwest side of the property and is leased by the USCG from the USACE. The marine facilities consist of a 225-ft x 35-ft fixed pier, a 15-ft wide access bridge connection to shore, and a 450-ft x 20-ft floating dock held in place with steel pipe guide piles. The property to the southwest of the USCG berth is currently utilized as a barge fleeting area and is near the USCG floating docks. The site currently accommodates two legacy cutters, the CGC CHEYENNE and CGC GASCONADE, which will be replaced with the incoming WCC Cutters. In addition, the existing USCG Base St. Louis site has the maintenance facility on the northeast slip of the site. When a vessel is in for maintenance at the maintenance berth, the site is restricted to one operational berth requiring rafting / shifting of vessels for operations, currently.

3.2.1 Mississippi River and Waterfront

The site is located on the western shoreline of the Mississippi River in St. Louis, MO. The Mississippi River is a vital waterway and defining feature of the region's geography, serving as a natural boundary between Missouri to the west and Illinois to the east (U.S. Geological Survey 2025; U.S. Army Corps of Engineers 2025). At normal stages, the river channel ranges from approximately 1,500 to 1,800 feet wide and can expand to over 2,800 feet during high-water events, with an average depth of 15 to 50 feet influenced by natural shoals and deep spots (U.S. Geological Survey 2025). The operational depth at the current mooring location exceeds 10ft.

This section of the river, part of the Middle Mississippi, a 300-mile reach from Saverton, Missouri, to Cairo, Illinois, which includes the confluence of major tributaries such as the Missouri, Illinois, and Ohio Rivers, serves as a critical transportation corridor for commercial and recreational vessels (USACE 2025a). River flow is influenced by precipitation and upstream water releases, affecting water levels and navigability (National Park Service 2025). In addition to its transportation role, the Mississippi River through St. Louis provides scenic and recreational opportunities, including boating, fishing, and riverfront activities.

The waterfront area of the site consists of a steeply sloped bank approximately 450 ft on the northwest to an elevation of approximately 400 ft at the edge of the Mississippi River near the center of the project area. The existing dock indicates a maximum operating level of +421.50', which is above the major flood elevation per NOAA at +419.58' NAVD'88. Floating docks are used to accommodate the range of water surface elevations that are common on the Mississippi River and to protect the infrastructure and vessels during flooding and water fluctuations.

USCG Base St. Louis waterfront facilities are located on the southeast side of the overall USCG property that is leased from the USACE and include the Wharf, Floating Dock, and riprap. The Wharf is located north of the Floating Dock and is constructed of steel piles, steel pile caps, and a concrete deck. The Floating Dock is parallel to the out-shore edge of the Wharf and Mississippi River shoreline and is constructed of steel float modules and guide piles. The Riprap is located at the land/water shoreline interface and is constructed of stone. The property to the southwest of the USCG berth is currently utilized as a barge fleeting area by another user and is near the USCG floating docks.

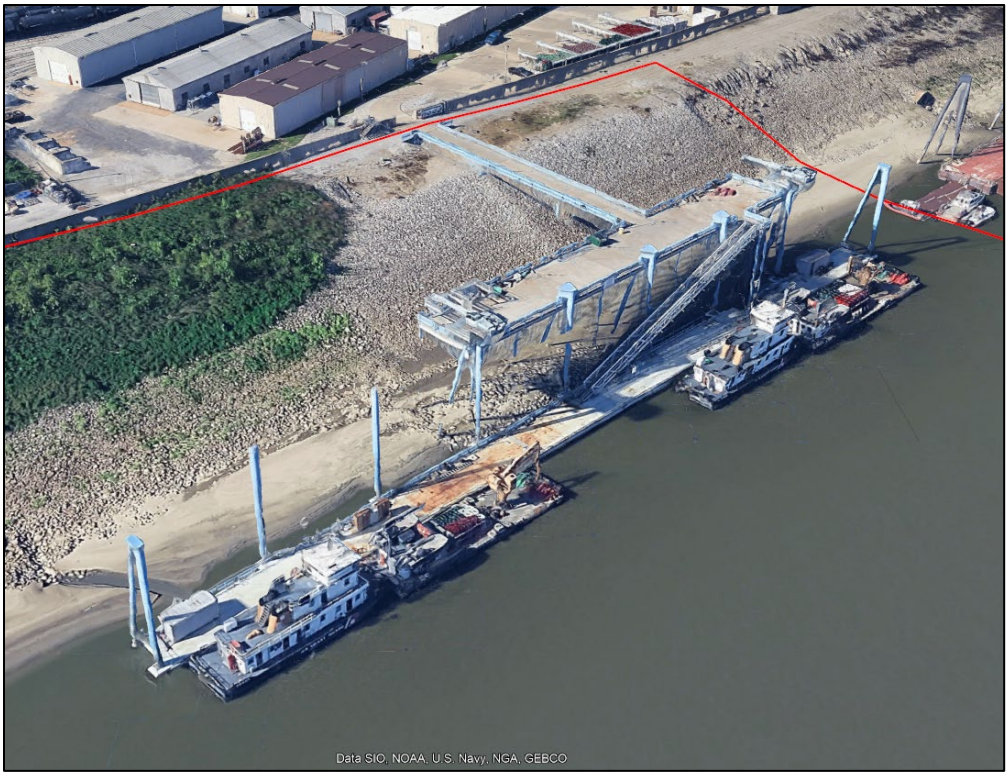

Figure 3-1: 3D image of the site (facing west bank, Google Earth August 2023) showing existing floating docks, wharf, and rip rap.

Figure 3-2: 3D images of the site
(facing upstream/northeast, Google Earth August 2023) showing bank slope and the existing dock, floating docks, and moored cutters at the facility. Fleeted barges are visible in the foreground.

3.2.2 Upland

The upland portions of the site are located at approximately 420 feet elevation at the crest of the bank. The site is owned by the USACE and the USCG leases the waterfront facility property. Current site infrastructure includes parking, roadways, buildings, and utilities. Security fencing and a floodgate separate the upland facilities from the waterfront area and effectively act as a project area boundary.

3.3 BIOLOGICAL RESOURCES

3.3.1 Affected Environment

This section describes biological resources potentially present at or near the project area, with special attention focused on federally listed, regulated, or managed species and habitat.

3.3.1.1 Federally Listed Species and Critical Habitat

Under the Endangered Species Act of 1973 (ESA), all federal agencies, in consultation with the Secretary of the Interior, must take all necessary precautions to ensure that their actions do not jeopardize federally listed endangered or threatened species, or destroy or degrade their habitats. The ESA provides a program for conserving threatened and endangered plants and animals and the habitats in which they are found. Under Section 7 of the ESA, federal agencies consult with the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) on Proposed Actions that may adversely affect species and designated critical habitat protected under the ESA.

An official species list was obtained from the USFWS *Information for Planning and Consultation* (IPAC) project planning tool on August 20, 2025, to identify federally threatened and endangered species that may occur in the proposed project area, and/or may be affected by the Proposed Action. A total of 4 federally listed threatened or endangered species are known to occur within the project area. Table 3 identifies those species that may be present within the areas directly and indirectly affected by the Proposed Action based on review of the formal species list from the USFWS (USFWS 2025a) and consideration of the life history and habitats of potential species. There are no designated Critical Habitat, Bat Habitat, Protected Areas, or Areas of Significant Biodiversity as defined by USFWS within the project area.

The species listed in Table 3 were also considered in the effects analysis for the Proposed Action. The IPAC is provided in Appendix A.

A habitat assessment was conducted for threatened and endangered species using site visit observations, literature and data from USFWS species fact sheet, USFWS species status review documents, Missouri Department of Agriculture (MDA) documentation, Missouri Department of Conservation (MDC) Missouri Natural Heritage Program, and Missouri Invasive Plant Council (MIPC). The following subsections describe species-specific habitat, ecological requirements, and geographic range, if available, for threatened and endangered species with the potential to occur within the project area.

Table 3: Threatened and Endangered Species Potentially in the Project Area.

Common Name	Scientific Name	Federal Status	Potential Occurrence in the Project Area
Mammals			
Tricolored Bat	*Perimyotis subflavus*	PE	Yes
Fish			
Pallid Sturgeon	*Scaphirhynchus albus*	E	Yes
Insects			
Monarch Butterfly	*Danaus plexippus*	PT	No
Plants			
Decurrent False Aster	*Boltonia decurrens*	T	No

T=Threatened, E=Endangered, PT=Proposed Threatened, PE=Proposed Endangered
Source: USFWS IPAC (USFWS 2025a)

Tricolored Bat (Proposed Endangered) – The Tricolored Bat is one of the smallest bats native to North America and are known to occur in 39 states. During the winter, they are found hibernating in caves and mines. Where caves or mines are not available, they will roost in culverts associated with roads. During the spring, summer, and fall, tricolored bats roost in forested areas, primarily among leaves of trees. Females form maternity colonies and move to different roost trees regularly (USFWS 2025b).

Pile driving, tree clearing, and other noise-generating construction activities may result in the loss of potential summer roosting habitat in trees for tricolored bats. However, the project area is located outside of known winter hibernation sites and summer maternity roosting habitats for this species.

Pallid Sturgeon (Endangered) – The pallid sturgeon is a bottom-dwelling, large-river obligate fish native to the Mississippi and Missouri Rivers and their tributaries, ranging from Montana to Louisiana. This species typically moves to areas of water bodies with gravel-bottoms in May, a behavior often associated with spawning. Spawning occurs between March and July, with southern populations reproducing earlier than those in the north. Pallid sturgeon fry primarily feed on zooplankton and small invertebrates, while juveniles and adults consume fish and aquatic insects. These fish prefer deeper sections of the river, with most individuals captured at depths exceeding 75 percent of the total water column and in areas with bottom water velocities generally less than 4.9 feet per second (USFWS, Pallid Sturgeon Recovery Coordinator, and Montana Fish and Wildlife Conservation Office 2014).

Disturbance of the substrate and sediment may result in the smothering of invertebrate prey species and the sedimentation of potential spawning habitats downstream. If suitable spawning habitat exists within the project area, it could be at risk of degradation or loss due to smothering and sedimentation. Additionally, the Proposed Action would result in an increase in vessel traffic, thereby increasing the potential for vessel strikes and other direct impacts from vessels on adult pallid sturgeon.

Monarch Butterfly (Proposed Threatened) – Monarch butterflies are large, migratory insects known for their long-distance journeys, often covering more than 3,000 kilometers. Their reproductive cycle is closely tied to milkweed plants, as females lay their eggs exclusively on milkweed, and the larvae feed solely on its leaves. This diet renders both caterpillars and adult butterfly's toxic to many predators, providing an effective natural defense (USFWS 2025c).

If milkweed is present within the project area, any disturbance or removal of this habitat could reduce the availability of suitable breeding sites for monarch butterflies.

Decurrent False Aster (Threatened) – Decurrent false aster typically grows in clumps up to six feet tall with branching stems. The species has lance-shaped, grey-green leaves, are distinctively decurrent, and have pink to white daisy-like flowers. The species is a facultative wetland plant that grows full sun and medium to wet soils (Missouri Botanical Gardens 2025). The species grows in wetlands, along the borders of lakes and marshes, and on margins of bottomland oxbow lakes and sloughs. Current habitats include riverbanks, old fields, roadsides, mudflats, and lake shores. Suitable habitat for the species requires moist soil and regular disturbance, preferably from periodic flooding, maintaining high light levels in open areas (MDC 2025a). In Missouri, decurrent false aster distribution is restricted to the Mississippi Floodplain south of the Illinois River. It is presently known to occur in St. Charles County in areas subject to Mississippi River flooding (MDC 2025a; MDC 2025b).

3.3.1.2 Aquatic Wildlife and Habitat

The Middle Mississippi River is a vast and intricate floodplain ecosystem, historically defined by a dynamic network of braided channels weaving past numerous islands and through an abundance of lakes and wetlands. The habitats in the Mississippi river are influenced by large fluctuations in water levels, strong currents, accumulation of debris along the shore, and frequent disturbance from current operational activities.

Water depths of the Mississippi River where it borders St. Louis County are generally 20 feet deep or deeper, but as shallow as 5.5 feet deep at the Chain of Rocks, a natural geologic outcropping located north of St. Louis and south of the Missouri River-Mississippi River confluence. U.S. Army Corps of Engineers (USACE), St. Louis District, maintains a navigation channel nine feet deep and 300 feet wide on the portion of the Mississippi River adjacent to the Proposed Action (USACE 2025b). The riverbed disturbance during construction and increased vessel traffic associated with the proposed action would temporarily impact aquatic wildlife due to human presence, noise, and increased turbidity. However, given the industrialized nature of the site and the heavy use of the surrounding waters, these effects are not expected to be significant. While drift is abundant in the project area and serves as a critical component of riverine fisheries, fish species are highly mobile and can temporarily relocate to more favorable nearby habitats, minimizing potential impacts.

Fish

Many marine and estuarine-dependent species of finfish are found in the Mississippi River and connecting rivers and streams with essential fish habitat in the waters designated for fish such as walleyes, largemouth bass, bluegills, crappies, common carp, buffalos, and channel catfish. The Pallid sturgeon, also referred to as the white sturgeon, is critically endangered. It can be found in the deeper waters of the Mississippi River (USFWS 2025d).

NMFS regulates Essential Fish Habitat (EFH) under the Magnuson-Stevens Fishery Conservation and management Act (2007), which is defined as "those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity." Based on a query of the NOAA Inland EFH Mapper (NOAA NMFS 2025), no areas of EFH or Habitat Areas of Particular Concern (HAPCs) were identified in the vicinity of the proposed project area.

Benthic Communities

Benthic communities are dominated by marine invertebrates. Shellfish include Mayflies (*Ephemeroptera*), fingernail clams (*Sphaeriidae)* and midges (*Chironomidae).*

The proposed action would result in the permanent alteration of benthic habitat through the removal or replacement of aquatic substrate, potentially leading to the loss of benthic organisms and early life stages of fish (e.g., eggs, larvae). However, due to existing disturbances and the relatively small scale of the project area in relation to the Mississippi River, benthic species are not expected to be present in high densities. Additionally, the strong current in the project area creates eddy effects, limiting suitable benthic habitat and attachment areas for submerged vegetation.

Aquatic Vegetation

The Proposed Action is located within the Middle Mississippi River, a large, regulated river system that has been substantially altered by anthropogenic activities. Flow regulation, channel straightening, dredging, bank stabilization, and levee construction have disrupted natural disturbance regimes, reduced upstream and downstream connectivity, and isolated the river channel from adjacent riparian and floodplain systems (Allen 2013). These modifications have contributed to in-stream habitat changes, including loss of aquatic vegetation and the creation of conditions unfavorable for vegetation establishment. The Proposed Action is located within an area of consistent, high levels of maritime activity, including ongoing maintenance dredging to facilitate navigation. Due to these factors, aquatic vegetation, including submerged vegetation beds, is unlikely to occur within the vicinity of the Proposed Action. If present, aquatic vegetation could be adversely affected by sedimentation and siltation generated by nearby dredging and maritime operations at the Proposed Action location and downstream.

3.3.1.3 Migratory Birds and Raptors

The Migratory Bird Treaty Act (MBTA) established special protection for migratory birds by regulating hunting or trade in migratory birds. The MBTA prohibits anyone to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR Part 21). Definition of "take" includes any disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young).

The Bald and Golden Eagle Protection Act (BGEPA), enacted in 1940, is a US federal law designed to protect bald eagles (*Haliaeetus leucocephalus*), golden eagles (*Aquila chrysaetos*), and their nests. It prohibits the killing, selling, or possession of these eagles, their parts, nests, or eggs without a permit. The law aims to conserve eagle populations, which were once severely threatened by hunting and habitat destruction. Violations of the act can result in significant fines and imprisonment.

The IPAC listed nine migratory birds and raptors with potential to occur within the project area (Table 4). These species were included because they were identified by USFWS as being "of particular concern either because they occur on the USFWS Birds of Conservation Concern list (BCC) or warrant special attention to your project location," and are a subset of all birds protected by the MBTA and BGEPA.

Table 4: Migratory Birds and Raptors with Potential to occur in the Project Area

Common Name	Scientific Name	Nesting Habitat	Breeding Season
American Golden-plover	*Pluvialis dominica*	Scrapes on the ground with lichen, grass, and leaves of willow and mountain avens (AllAboutBirds, 2025a).	Elsewhere
Bald Eagle	*Haliaeetus leucocephalus*	Trees in forested areas adjacent to large bodies of water, away from heavily developed areas.	Oct 15 to Aug 31
Chimney Swift	*Chaetura pelagica*	Artificial sites with low light and vertical surfaces including chimneys, air vents, boat houses, old wells, abandoned cisterns, silos, outhouses, barns, firewood sheds, and lighthouses (AllAboutBirds, 2025b).	March 15 to Aug 25
Eastern Whip-poor-will	*Antrostomus vociferus*	On the ground of the forest floor in leaf litter, usually on the north or northeast side of shrubs, herbs, or seedlings that will shade the nest. Species may nest on bare ground, sand, or decayed wood (AllAboutBirds, 2025c).	May 1 to Aug 20
Kentucky Warbler	*Geothlypis Formosa*	On the ground at the base of a plant with a well concealed understory such as a fern or shrub. Occasionally nests will be located a few feet up in a shrub (AllAboutBirds, 2025d).	Apr 20 to Aug 20
Lesser Yellowlegs	*Tringa flavipes*	On the ground within 200 meters of a water source and next to fallen logs, branches, or underneath low shrubs AllAboutBirds, 2025e).	Elsewhere
Prothonotary Warbler	*Protonotaria citrea*	In trees within holes created by woodpeckers and chickadees, in natural holes in standing dead trees, and in nest boxes. Nests are often found near or over standing water in willows, bald cypress, and sweet gum trees (AllAboutBirds, 2025f).	Apr 1 to Jul 31
Red-headed Woodpecker	*Melanerpes erythrocephalus*	In dead trees or dead parts of a live tree. Tree species include pines, maples, birches, cottonwoods, and oaks. Habitat is generally an open forest or field with little vegetation on the ground. The species may also use excavated holes in utility poles, live branches, or buildings (AllAboutBirds, 2025g).	May 10 to Sep 10
Rusty Blackbird	*Euphagus carolinus*	In trees and shrubs near water with a bulky outer layer of twigs, grass, and lichens (AllAboutBirds, 2025h).	Elsewhere

3.3.1.4 Terrestrial Vegetation

Ecological regions, or ecoregions, are large areas of land and water that share similar physical and biological characteristics, such as vegetation, soil, climate, and wildlife. Ecoregions are often used to understand the relationship between biotic and abiotic factors of the environment. The project area is within the Interior River Valleys and Hills US EPA Level III ecoregion, Middle Mississippi Alluvial Plain Level IV ecoregion (Chapman, et al. 2002). The Middle Mississippi Alluvial Plain ecoregion is a narrow strip of

land between the Missouri and Ohio rivers and consists of a smooth alluvial plain with widespread croplands agriculture and stream channelization. Aquatic habitats are affected by turbidity, current, and volume from the Missouri River, as well as stormwater runoff from the nearby urban areas (Chapman, et al. 2002b).

The project area is within Major land Resource Area (MLRA) 115B – Central Mississippi Valley Wooded Slopes, Western Part. Species found within the floodplains include American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), river birch (*Betula nigra*), green ash (*Fraxinus pennsylvanica*), silver maple (*Acer saccharinum*), sweetgum (*Liquidambar styraciflua*), American sycamore (*Platanus occidentalis*), pin oak (*Quercus palustris*), pecan (*Carya illinoiensis*), and willow (*Salix spp*.). Low lying areas include sedges and grass meadows with scattered trees (USDA NRCS 2022).

Based on the site visit, terrestrial vegetation at the project area was limited to one strip of forested habitat along the western boundary. Present species included silver maple, eastern cottonwood, roughleaf dogwood (*Cornus drummondii*), white mulberry (*Morus alba*), Canada goldenrod (*Solidago canadensis*), Japanese honeysuckle (*Lonicera japonica*), and riverbank grape (*Vitis riparia*). During the site visit, an attempt was made to excavate a soil pit; however, the topsoil was observed to be very thin and directly underlain by a gravel-restrictive layer. The limited topsoil depth and high gravel content in the project area are likely to influence the composition and distribution of vegetation present on the site.

3.3.1.5 Noxious Weeds, Nuisance Species, and Non-Native Invasive Species

Noxious weeds, invasive, and non-native species are species that are highly competitive, persistent, and spread easily. Weeds typically establish and infest disturbed areas along roadsides and waterways. Changes in plant community composition from native species to non-native species can alter fire regimes, degrade water quality, increase soil erosion, and negatively affect habitat quality, biodiversity, and ecosystem function and structure.

The USCG is required to limit invasive species on USCG-managed property in line with the Invasive Species Council's *Invasive Species Management Plan, Invasive Species*, EO 13112, and *Safeguarding the Nation from the Impacts of Invasive Species*, EO 13751 (COMDTINST 5090.3A). The Federal Noxious Weed Act of 1974 (7 US Code 2801-2813) as amended by Sec. 15, *Management of Undesirable Plants on Federal Lands 1990*, requires that each federal agency:

1. Designate a lead office and person trained in the management of undesirable plants;
2. Establish and fund an undesirable plant management program;
3. Complete and implement cooperative agreements with State agencies; and
4. Establish integrated management systems to control undesirable plant species.

The MIPC reports invasive plant species by region within the state of Missouri (MIPC 2025). According to the Invasive Plants List for Main Waterways/Big Rivers, Japanese honeysuckle, a species observed within the project area, is listed on Missouri's Top Nine Expanding Invasive Plant List and Top 25 Statewide Invasive Plants List (MIPC 2023a, 2023b).

The MDA reports noxious weeds within the state of Missouri. According to the MDA, several species of thistles and thistle-like plants, vines, grasses, and other species are included on the Missouri Noxious Weed List (MDA 2025). None of the species listed were observed within the project area.

Nuisance species are non-native species that have moved outside of their native range and threaten the diversity or abundance of native species, the ecological stability of waters, or commercial, agricultural, or recreational activities dependent on such waters. An invasive species becomes a "nuisance" due to their disruption of the environments where they are introduced. The MDC reports nuisance and problems species within the state of Missouri (MDC 2025c, 2025d). Table 5 provides an overview of nuisance species with potential to occur within the project area.

Table 5: Nuisance Species with Potential to Occur

Species Category	Life Form	Potential Occurrence in the Project Area
Armadillo	Mammal	Yes
Badger	Mammal	No
Bat	Mammal	Yes
Beaver	Mammal	Yes
Black Bear	Mammal	No
Blackbird	Bird	Yes
Canada Goose	Bird	Yes
Chipmunk	Mammal	Yes
Common Snapping Turtle	Reptile	Yes
Cottontail Rabbit	Mammal	Yes
Coyote	Mammal	Yes
Deer	Mammal	Yes
Groundhog	Mammal	No
Mole	Mammal	No
Muskrat	Mammal	Yes
Opossum	Mammal	Yes
Otter	Mammal	Yes
Raccoon	Mammal	Yes
Skunk	Mammal	Yes
Squirrel	Mammal	Yes
Vole	Mammal	No
Weasel	Mammal	No
American Lotus	Aquatic Plant	No
Cattail	Aquatic Plant	No
Chara	Aquatic Plant	No
Coontail	Aquatic Plant	No
Duckweed	Aquatic Plant	No
Filamentous Algae	Aquatic Plant	No
Hydrilla	Aquatic Plant	No
Naiads	Aquatic Plant	No
Pondweeds	Aquatic Plant	No
Water Lilies	Aquatic Plant	No

Species Category	Life Form	Potential Occurrence in the Project Area
Water Milfoils	Aquatic Plant	No
Water Primrose	Aquatic Plant	No
Water Shield	Aquatic Plant	No

3.3.2 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; Fish and Wildlife Coordination Act; Magnuson-Stevens Fishery Conservation and Management Act; CWA; MBTA; or other federal, state, or local laws protecting biological resources.

Activities that most likely affect significant riverine fish and wildlife habitats including, but not limited to, are changes in substrate composition, possible release of contaminants otherwise stored in sediments, removal of existing aquatic vegetation if present, increase in vessel traffic, or changes in circulation patterns and sediment transport mechanisms.

3.3.2.1 Federally Listed Species

Coordination has been conducted with the Draft EA and updated with the issuance of the Final EA. USCG will adhere to all recommendations and requirements provided by USFWS including pre-clearance surveys and BMPs listed in Section 5. The IPAC is provided in Appendix A.

Pallid Sturgeon

The Proposed Action area is located within the Middle Mississippi River, defined as the stretch between the Missouri-Mississippi River confluence near St. Louis, Missouri, and the Mississippi-Ohio River confluence near Cairo, Illinois. Project activities would occur at the USCG Arsenal Street facility, within and adjacent to the Mississippi River channel.

Since 1973, the Middle Mississippi River has been regulated to maintain navigability through the construction of levees, revetments, and dikes. These modifications have resulted in a narrower river width, riverbed degradation, a slight increase in maximum river stage, and a constricted floodplain. Approximately six miles upstream of the project area, the Chain of Rocks Canal and dam were constructed to facilitate navigation around shallow bedrock in this reach. Pallid sturgeon are known to concentrate downstream of the Chain of Rocks, particularly during fall and winter low-flow periods (USFWS 2025d; USFWS, Pallid Sturgeon Recovery Coordinator, and Montana Fish and Wildlife Conservation Office 2014).

In-channel activities associated with the Proposed Action may directly or indirectly affect pallid sturgeon, if present. Pallid sturgeon fry primarily feed on zooplankton and small invertebrates, while juveniles and adults feed on fish and aquatic insects. Increased siltation from in-channel activities could degrade or eliminate these food sources. Pallid sturgeon typically prefer deeper river sections with velocities less than 4.9 feet per second. If flow velocities in the project area exceed this threshold, individuals may relocate to more suitable habitat. Similarly, if bottom substrate consists of mud, silt, or vegetation rather than gravel or sand, sturgeon may avoid the area. However, due to their adaptation to naturally turbid environments, pallid sturgeon may still utilize sections of the river with high turbidity. Highly turbid river systems such as the Mississippi River are components of natural ecological processes in which pallid

sturgeon evolved. Therefore, increased turbidity in the river from the construction activities is not anticipated to directly impact the pallid sturgeon.

The Proposed Action could cause a temporary increase in vessel activity, in the project area, during construction and a permanent increase in vessel activity following completion, as the expanded dock will accommodate additional use. While increased vessel traffic has the potential to disturb aquatic habitat utilized by pallid sturgeon, the effects are expected to be localized and temporary during construction, with long-term impacts minimized through adherence to established construction BMPs. The USCG would implement BMPs, as outlined in Section 5, to minimize potential impacts to water quality and aquatic species.

The largest risk to pallid sturgeon due to project construction would be from increased underwater noise during pile driving. Refer to Section 3.7 for a detailed evaluation of pile driving noise. As such, it has been determined that the Proposed Action **may affect but is not likely to adversely affect** the pallid sturgeon.

Tricolored Bat

Tricolored bats migrate seasonally from summer roosting habitats to wintering hibernacula. During the summer, spring, and fall, tricolored bats roost in the foliage of forested areas. During winter hibernacula, tricolored bats prefer caves and mines.

White-nose syndrome is the leading cause of population decline. Other stressors of tricolored bat populations include wind-energy-related mortality, habitat loss and disturbance, and climate change effects. Threats included in habitat loss and disturbance include forest removal or conversion, human hibernacula destruction or disturbance from human entry into these sites. Loss of roosting, foraging, and commuting habitat also impacts the tricolored bat. However, severity of population decline from habitat loss Is considered “low” by USFWS (50 CFR Part 17).

The Proposed Action includes pile driving, tree clearing, and other noise-generating construction activities as well as proposed additional lighting during operation. These activities could result in direct impacts through removal of potential roost trees and indirect impacts from noise and light disturbance and changes in adjacent land use. While USFWS identifies habitat loss as a relatively low-level threat compared to other factors, the Proposed Action has the potential to affect tricolored bats due to the presence of suitable summer habitat and anticipated construction noise and additional lighting during operation.

Some potentially suitable summer roost and foraging habitat could be affected by the Proposed Action tree clearing activities. All tree clearing associated with the Proposed Action would occur during the inactive season from November 1 to March 31 unless negative presence/probable absence surveys are obtained for the action area through appropriate surveys approved by the USFWS. There is also the possibility that construction activities could disturb bats in nearby foraging and roosting habitats, but this impact would be minor and would not significantly disrupt normal behavior patterns due to individuals being able to relocate to other nearby habitat. It is our determination that the Proposed Action **may affect but is not likely to adversely affect** the tricolored bat.

Monarch Butterfly

The monarch butterfly migrates annually throughout the United States and Mexico. The reproductive cycle is closely tied to milkweed species. Milkweed species were not identified during the site visit. No

suitable habitat is located within the project area (Monarch Watch 2025). Therefore, the Proposed Action **is not anticipated to impact the monarch butterfly**.

Decurrent False Aster

Decurrent false aster grows in wetlands, along the borders of lakes and marshes, and on margins of bottomland oxbow lakes and sloughs. Current habitats include riverbanks, old fields, roadsides, mudflats, and lake shores. Suitable habitat for the species requires moist soil and regular disturbance, preferably from periodic flooding, maintaining high light levels in open areas (MDC 2025a). In Missouri, decurrent false aster distribution is restricted to the Mississippi Floodplain south of the Illinois River. It is presently known to occur in St. Charles County in areas subject to Mississippi River flooding (MDC 2025a, 2025b). Terrestrial portions of the project area contain developed land for industrial and maritime use, riprap shorelines, and a small sliver of forested area. While the species has potential to occur within disturbed areas within the Mississippi River floodplain, open areas with regular disturbance from flood waters are not present within the project area. Due to the lack of suitable habitat within the project area, the Proposed Action **is not anticipated to impact the decurrent false aster**.

3.3.2.2 Migratory Birds and Raptors

Construction activities within the project area due to implementation of the Proposed Action could potentially result in destruction of native nests or disturb the behavior of migratory birds and raptor species. Project activities would result in permanent removal of a portion of the forested area and temporary disturbance due to the presence of humans and by creating noise and dust. The USCG would implement BMPs (Section 5) to minimize or reduce the effects of Proposed Action activities on migratory birds and raptors and their habitat. Effects from noise and dust would be negligible, temporary, and localized relative to the existing operational activities at the site.

Migratory birds and raptors are most susceptible to anthropogenic pressure during their breeding (nesting) season. Of the six species that are known to breed in the area (Table 4), three species nest in trees or tree cavities, two nest on the ground, and one nests in chimneys. The shore of the project area is steep and comprised of large cobbles, boulders, and bricks. Forested habitat is located at higher elevations along the shoreline within and landward of the project area. Suitable ground nesting sites within the project area are lacking. Potential tree nesting habitat exists within the narrow, forested area landward of the shoreline. Tree or vegetation removal will likely occur as part of the proposed access ramp. USCG would implement BMPs prior to construction and demolition activities as required by USFWS and listed in Section 5. Direct effects to migratory birds and raptors and their habitat would be negligible, temporary, and localized.

3.3.2.3 Terrestrial Vegetation

A minor amount of terrestrial vegetation on the northern end of the forested uplands would be cleared for the proposed access ramp. The vegetation that would be affected includes roughleaf dogwood saplings, white mulberry saplings, Canada goldenrod, Japanese honeysuckle, and riverbank grape. Relative to the adjacent forested/shrub areas south of the project area that would not be disturbed by the Proposed Action, the removal of this vegetation would be negligible, long-term, and localized.

3.3.2.4 Aquatic Vegetation and Habitats

Direct impacts from the proposed action involve the loss of benthic community associated with the river bottom due to construction and pile driving. Pile driving will have an immediate, albeit temporary, minimal effect on the feeding success of those species dependent on benthic invertebrates.

Entrapment or physical injury of listed species or their prey is not likely to occur. Non-motile prey of listed species may become victims of pile driving operations, but the listed species should be able to find food elsewhere. Therefore, no more than minimal impact on listed species or their habitat is anticipated.

Direct impacts on aquatic habitat associated with the Proposed Action area may include short-term negative effects on water quality and increased sedimentation, siltation, or runoff during construction.

Pile driving operations may cause short-lived (less than one hour) increases in turbidity and contaminant concentrations in the water column. While predator and prey species in the area are expected to be minimally affected, likely dispersing to quieter nearby waters, temporary turbidity can impair fish species' ability to locate food and engage in breeding or spawning. Elevated sedimentation may also reduce available substrate surfaces for sessile larval-stage marine organisms that require solid attachment, such as certain shellfish, crustaceans, and plankton. In addition, sediment-associated contaminants can disrupt normal life cycle development in marine organisms and bioaccumulate within the food chain.

Aquatic species may experience temporary adverse effects, such as hydroacoustic disruption caused by pile driving using vibratory or impact hammers during construction, construction-related noise and dust, the possibility of construction debris entering the water, and general disturbance resulting from the installation and removal of in-water structures. These impacts will be of a short duration. Increased vessel traffic for the Proposed Action could affect aquatic species through increased likelihood for vessel strikes and increased turbidity from vessel wakes. However, the Proposed Action would occur in an area already utilized by many vessels and barges where maintenance dredging regularly occurs. Therefore, the Proposed Action area will have negative but minor short- and long-term direct and indirect impacts on aquatic habitat.

3.3.2.5 Noxious Weeds, Nuisance Species, and Non-Native Invasive Species

Inland and in-channel surface disturbance, increased vessel traffic, and in-channel activities within the Proposed Action area could increase the risk of introducing or facilitating the spread of noxious weeds, invasive and non-native species, or aquatic nuisance species. The USCG has multiple responsibilities to address invasive species through enforcement of international fisheries and maritime agreements, including those related to ballast water management (USDOI 2017). The USCG has established programs to disseminate information on aquatic nuisance species and promote best management practices to prevent their spread via ballast water. These efforts support compliance with ballast water management regulations under 33 CFR 151.

Vegetation and landscaping of the facility and within the project area are actively managed by the USCG, including mowing, weed management, and physical removal of debris accumulation on the shoreline. Site management reduces the risk of noxious weed establishment and spread. Effects from noxious weeds, invasive and non-native species, and aquatic nuisance species would be negligible, short-term, and localized. The potential effects from the Proposed Action area would be negligible, relative to current operational activities (e.g., vessel traffic) in the project area.

3.3.2.6 No Action

Under the No Action Alternative, operations of the facility would continue, and all operational impacts discussed for the Proposed Action such as operation noise impacts and risk of vessel impacts to aquatic species would be the same. If the No Action Alternative were selected, the WCC Homeport Facilities St. Louis MO will not be expanded and no impacts to biological resources due to construction, such as those discussed above, including sensitive habitat or special status species would occur.

3.4 CULTURAL RESOURCES

The term "cultural resources" is used to describe archaeological sites, illustrating evidence of past human use of the landscape; the built environment, represented by structures such as dams, roadways, and buildings; and traditional resources, such as sacred sites and traditional cultural properties. The National Historic Preservation Act (NHPA) of 1966 is the primary federal legislation that outlines the federal government's responsibility to consider cultural resources. Other applicable cultural resources laws and regulations that could apply include the Native American Graves Protection and Repatriation Act, the Archaeological Resources Protection Act, and the Abandoned Shipwreck Act.

3.4.1 Affected Environment

The area of potential effects (APE) defined for the Proposed Action is confined to the maximum extent of the boat docks being added along with the upland project components including roadway and utility line tie-ins. The proposed project area is illustrated in Figure 3-3.

According to the St. Louis Cultural Resource Office, there are no designated historical landmarks within the immediate vicinity of the proposed project area. However, several historic districts are partially located within a 1-mile radius, including the Soulard Neighborhood (a Certified Local Historic District), Lucas Avenue Industrial Historic District, Gravois-Jefferson Streetcar Suburb Historic District, Benton Park District, and Marine Villa Neighborhood Historic District.

The National Register of Historic Places (NRHP) includes the following properties within a 1-mile radius of the project area in Missouri: Chatillon-DeMenil House, Oehler Brick Buildings, Burgherr's Service Station, Schollmeyer Building, Chippewa Trust Company Building, and C. Hager & Sons Hinge Co.

Given the project area's location along the Mississippi River and its proximity to the Illinois state line, the nearest NRHP-listed property in Illinois is the Old Cahokia Courthouse, situated approximately 1.5 miles from the project area (See image below and Figure 3-3).

The Surficial Material Geologic Map of the area issued by MDNR shows the project area is primarily within "Artificial Fill" with a narrow band of "Quaternary silt-capped alluvium" deposit along the bank of the Mississippi River (MDNR 2010). (See image below and Figure 3-4).

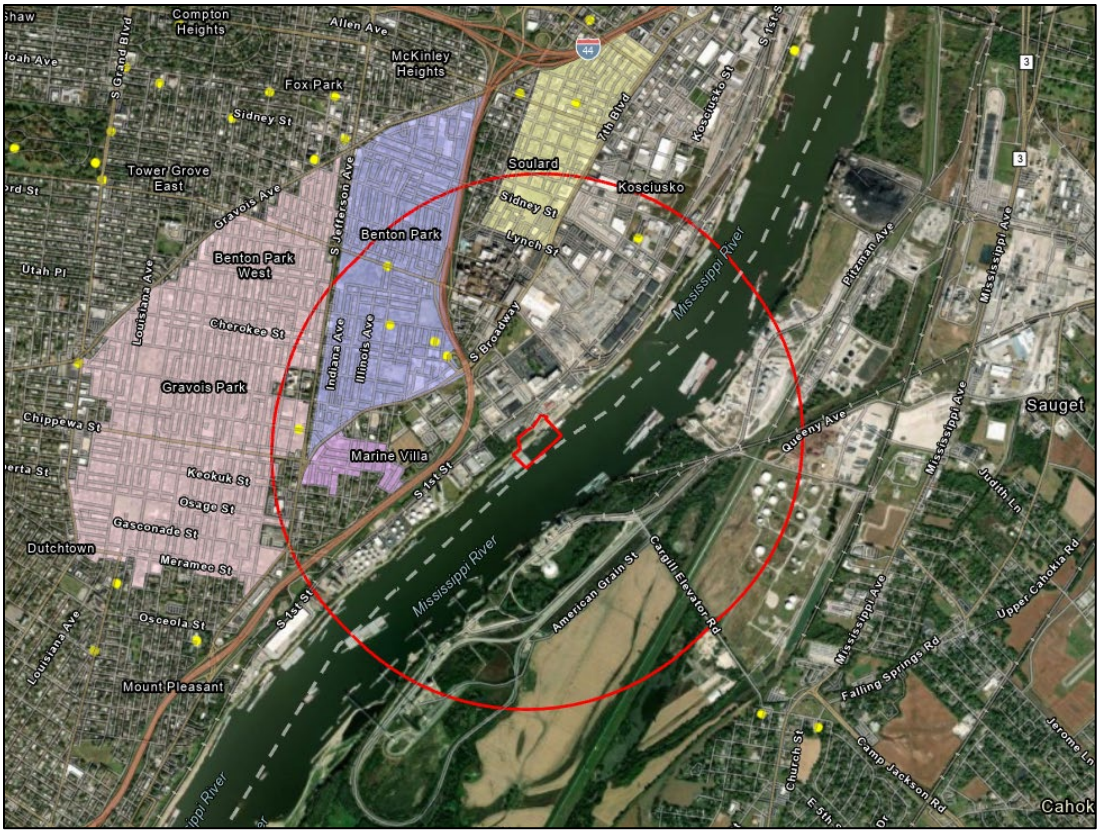

Figure 3-3: Map depicting a 1-mile buffer around the project area, highlighting nearby historic sites and districts.

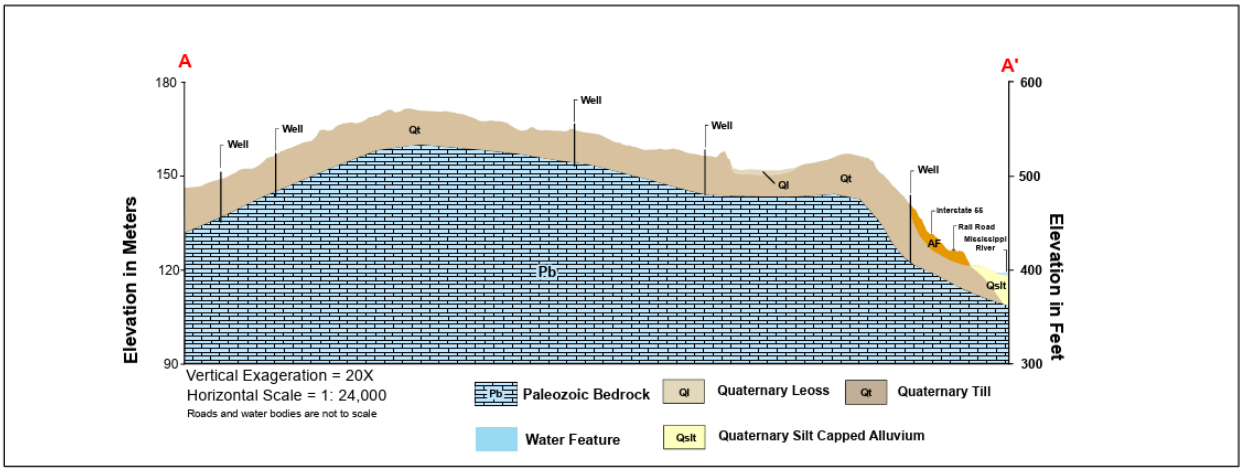

Figure 3-4: Cross Section of Surficial Material Geology in Project Area (MDNR 2010)

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action

For the purposes of this EA, the Proposed Action has been determined to have No Effect upon cultural resources in or eligible for inclusion in the National Register of Historic Places.

Construction-related impacts to historic and cultural resources at Base St. Louis will consist of potential disturbances caused by upland ground-disturbing activities and pile driving operations. The USCG has operated at Base St. Louis since 2000 and has a long history of operations at the site. This limits the potential for undiscovered archeological or cultural resources to occur within the project area. While unlikely, the very slight potential exists for buried human remains or historic artifacts to be uncovered during ground-disturbing activities. In the event, such resources were uncovered, activities will be suspended until a qualified archaeologist and Native American representative could determine the significance of such resource(s) and evaluate the resource(s) for NRHP eligibility, in compliance with Section 106 of the NHPA. Based on information currently available, construction-related impacts under the Proposed Action to cultural resources will be negligible.

Ground disturbance expected outside the floodwall is limited to foundation excavation and grading for the proposed roadway extension and access ramp located immediately adjacent to the flood wall. In water disturbance will be limited to the removal of existing piles and the installation of approximately 4 new pile clusters to the south of the existing moorings.

Ground disturbance on the USACE property inside the floodwall is expected to be limited to trenching approximately 2 feet deep and construction of concrete pads for the installation of new underground electrical and communication utilities. The proposed minor and shallow ground disturbance as part of the implementation of the Proposed Action was determined to have no effect on NRHP-listed or eligible archaeological resources that have been recorded near the project area.

In compliance with Section 106 of the NHPA federal agencies are required to 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. A letter and "State Historic Preservation Office Review and Compliance Information Form" was sent to the MO SHPO requesting a Section 106 review of the Area of Potential Effects (APE) was sent on January 14, 2026. MO SHPO concurred, pursuant to Section 106 of the NHPA, that the Proposed Action would have No Adverse Effect to Historic Properties and was at low risk for cultural resources in a letter received March 27, 2026.

3.4.2.2 No Action

If the No Action Alternative were selected, no change or impacts to cultural resources would occur.

3.5 Air Quality

The EPA General Conformity Rule (40 Code of Federal Regulations [CFR] 93, Subpart B for federal agencies and 40 CFR 51, for state requirements) requires all federal agencies to ensure that any agency action or activity conforms to an approved State Implementation Plan for Clean Air Act (CAA) Amendments of 1990 compliance with National Ambient Air Quality Standards (NAAQS). NAAQS represents maximum levels of background pollution that are considered safe, with an adequate margin of safety, to protect public health and welfare.

This applies only to federal actions in nonattainment or maintenance areas. The General Conformity Rule requires analysis of total direct and indirect emissions of criteria pollutants, including precursors, when determining conformity of the Proposed Action. The Rule applies if the Proposed Action's emissions are greater than 10 percent of an area's total emissions of a given pollutant and are considered "regionally significant" or emissions exceed *de minimis* thresholds. If *de minimis* thresholds are exceeded, a conformity decision shall be made.

3.5.1 Affected Environment

The Proposed Action is located along the Mississippi River within the St. Louis metropolitan area. The St. Louis, MO-IL nonattainment area is currently designated by the EPA as Serious for the 2015 8-hour ozone National Ambient Air Quality Standards (NAAQS). The affected area includes Jefferson County, St. Charles County, St. Louis County, and the City of St. Louis in Missouri, as well as Madison and St. Clair Counties in Illinois. The Missouri portion of the area was reclassified to "Serious" by operation of law in late 2024 after failing to attain the standard by the designated date (40 CFR Part 81.326). The pollutants of concern for ozone formation are nitrogen oxides (NO_x) and volatile organic compounds (VOC), which act as precursors.

Other criteria pollutants (carbon monoxide, sulfur dioxide, lead, particulate matter) are currently in attainment in the project area. The Missouri Department of Natural Resources and Illinois Environmental Protection Agency share responsibility for implementing the State Implementation Plan (SIP) for the St. Louis ozone nonattainment area (MDNR 2023).

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action

Operations of the Proposed Action are not considered for impacts to air quality because the operations of the new WCCs and exiting maintenance facility are continuation of existing operations by the USCG and were assessed with the 2022 PEIS (USCG 2022).

Construction activities, including pile driving, dock installation, barge use, and support equipment (cranes, diesel generators, trucks), would generate temporary emissions of NO_x, VOC, CO, PM, and SO_2. These emissions would occur intermittently during the construction period and would be localized to the project site and haul routes.

Project-related emissions were estimated based on standard EPA emission factors and conservative equipment usage assumptions (EPA 2023). The analysis conservatively assumed several types of construction vehicles would be used including cranes, pile drivers, support tugs, dump trucks and haul trucks, and portable generators. The analysis indicates that total annual emissions of NO_x and VOC would be less than 3.8 tpy NO_x and 0.25 tpy VOC[2], which are well below the General Conformity de minimis thresholds of 50 tons per year for both NO_x and VOC applicable to "Serious" ozone nonattainment areas (40 CFR 93.153 (b)(1)). Additionally, as the construction of the Proposed Action is anticipated to take less than one year to complete, the project would be well within the conformity thresholds even under far more conservative estimates.

[2] Using EPA 2023 NONROAD-derived example composite factors (NO_x = 6.0 g/hp-hr, VOC = 0.4 g/hp-hr) from the EPA-420-R-22-015 and the NONROAD user guidance

Because the Proposed Action's construction emissions fall below these thresholds, it is presumed to conform, and no formal General Conformity Determination is required.

To minimize temporary construction emissions, the following measures would be implemented where practicable:

- Use of newer or well-maintained engines meeting EPA Tier 3/Tier 4 standards;
- Limiting unnecessary idling of vehicles and equipment;
- Using ultra-low sulfur diesel fuel for marine and land-based equipment;
- Scheduling material deliveries to avoid peak traffic congestion.

With these measures in place, the Proposed Action's contribution to regional ozone precursor emissions would be negligible and would not cause or contribute to a violation of NAAQS.

3.5.2.2 No Action

Under the No Action Alternative, no construction would occur, and there would be no associated emissions of criteria pollutants. No effects to air quality would occur.

3.6 GEOLOGY TOPOGRAPHY AND SOILS

Geological resources consist of surface and subsurface materials and their properties. Principal geologic factors influencing the ability to support structural development are seismic properties (*i.e.,* potential for subsurface shifting, faulting, or crustal disturbance), soil stability, and topography.

The Mississippi River near St. Louis, Missouri, is deeply influenced by glacial and river processes during the late Cenozoic. During this time, multiple glacial advances to the north of the region redirected pre-existing river systems, including the ancient Teays and ancestral Missouri rivers, contributing to the formation of the modern Mississippi's path (Carson 2018). As glaciers melted, vast volumes of meltwater surged southward, carving deep valleys and depositing thick layers of outwash sediments across the Mississippi valley. These floodwaters significantly widened the Mississippi's valley and established its present course through the region. Additionally, the bedrock beneath St. Louis, mainly Mississippian-age limestone and dolomite, has limited how deeply it could erode in places. The result is a broad, sediment-filled floodplain marked by terraces and abandoned channels, which reflect the river's ongoing adjustments to changes in sediment load, climate, and base level since the end of the last Ice Age (Klinkenberg 2011).

3.6.1 Affected Environment

Base St. Louis is located on the western bank of the Mississippi River, downstream of the southernmost lock and dam, Lock No. 27 at The Chain of Rocks. Around St. Louis, Missouri, the Mississippi River is a wide waterway that serves as a hub for commerce and transportation. At this point, it is joined by the Missouri River just north of the city and the Illinois River slightly upstream, making it one of the most significant confluences in North America. The river near St. Louis is bordered by levees and floodwalls to protect the city from seasonal flooding, and it supports busy barge traffic, industrial docks, and riverfront parks.

Soils

According to the United States Department of Agriculture (USDA) and U.S. Geological Survey (USGS), the soils at Base St. Louis are classified as Urban land-Fishpot complex, 0 to 2 percent slopes, occasionally

flooded (68099), with underlying bedrock composed of St. Louis Limestone (Msl) [USDA Natural Resources Conservation Service (NRCS)]. The soils within the project area are highly modified urban land and are not classified as prime farmland.

Topography

The topography of the Mississippi River at St. Louis, Missouri, features a broad, low-lying floodplain bordered by gently rising bluffs to the east and west. The river itself flows through a relatively flat valley, which was carved and widened by glacial meltwater during the last Ice Age. The Missouri side includes higher bluffs and rolling hills. This flat floodplain has made the area prone to seasonal flooding, prompting the construction of levees and floodwalls. The Missouri and Illinois Rivers upstream of the project area has also shaped the surrounding landscape through sediment deposition and erosion. Within the proposed project area, the elevation slopes from approximately 450 ft on the northwest to an elevation of approximately 400 ft at the edge of the Mississippi River near the center of the project area. The operational depth at the current mooring location exceeds 10ft.

Erosion

The river's strong current, especially during high-flow events like spring floods, can wear away riverbanks and reshape the channel. This erosion is intensified where the river curves or where the soil is less compact. However, in the St. Louis area, much of the riverbank is reinforced with levees, riprap (rocky barriers), and concrete structures to reduce erosion and protect urban infrastructure. Despite these measures, erosion still occurs in less fortified areas, contributing to sediment transport downstream and altering habitats along the river. The riverbank within the project area is armored by concrete riprap to protect the shoreline from erosion.

3.6.2 Environmental Consequences

The following criteria were used to evaluate potential effects on geology, topography, and soils:

- The alternative would be considered to have an adverse effect if it would disturb or remove natural soils or remove soils used for agriculture or mining. The adverse effect would be considered significant if it would result in increased erosion, soil contamination, or impacts to rare or valuable soils within the United States. The adverse effect would be considered less than significant if soil disturbance and potential erosion could be effectively managed through the implementation of BMPs.
- The alternative would be considered to have a beneficial effect if it would reduce or minimize soil erosion or contribute to soil stability and protection.

3.6.2.1 Proposed Action

The Proposed Action will not affect areas utilized for agriculture or mineral resources. The underlying bedrock is mapped as St. Louis Limestone (Msl). Bedrock is poorly exposed throughout the extensively urbanized St. Louis quadrangle. The operational depth at the current mooring location exceeds 10ft; no dredging is anticipated as part of this project. Dredging of the riverine bottom in the area of the floating docks was previously completed under a separate contract in support of the Base St. Louis Relocation project waterfront improvements. Additionally, depths are maintained on the middle Mississippi River segment by the authorized USACE Regulating Works Project. While there may be future maintenance dredging conducted in this area under USACE authority, dredging is not proposed as part of this project.

The Proposed Action area does not include dredging and therefore impacts on geology and topography would be considered short-term and negligible, and no long-term impact would be anticipated.

3.6.2.2 No Action

If the No Action Alternative were selected, the Base St. Louis will not be expanded and no significant impacts to geological resources would occur due to no change in operations and maintenance schedule.

3.7 NOISE

3.7.1 Affected Environment

Noises from natural sources, such as wind-driven waves, storms, fish, and currents, are considered ambient underwater sound levels. Underwater noise levels increase when anthropogenic sources are added to ambient noises. Anthropogenic underwater sound in the Mississippi River could be generated by fishing and recreational vessels, large commercial vessels, pile-driving, and dredging. The affected environment for noise impacts could include airborne noise and underwater noise due to construction and operations. For this EA, airborne noise impacts are expected to be minimal and consistent with standard construction noise levels expected in this industrialized area of the river frontage and therefore are not assessed in detail. Underwater noise from vessels and construction equipment would be consistent with background levels of the Mississippi River. Underwater noise due to proposed pile driving would be the most significant source of noise in the aquatic environment for fish and other organisms in the vicinity of the Proposed Action. These sounds would be added to the baseline sound conditions of the Mississippi River. Pile driving activities have the potential to produce underwater sound pressure levels (SPLs) and particle motion that may affect aquatic organisms, including the federally listed pallid sturgeon. Impact driving of large-diameter steel piles is a recognized source of high-energy impulsive sound.

3.7.2 Environmental Consequences

During construction activities in the Mississippi River, such as dredging, vessel operations, pile driving and pier construction, there is a potential to disturb or injure pallid sturgeon near the Proposed Action area. The Proposed Action includes the construction and installation of 14 36-inch steel piles. The piles are located at approximately the toe of the bank slope and would be expected to be inundated by river water levels during extended timeframes of the year. Due to their location in the water, the driving of the piles for installation would cause noise impacts as described above. Given the project location within occupied habitat of pallid sturgeon in the Middle Mississippi River (USFWS 2014; USACE 2023), temporary exposure of individuals to pile-driving noise is likely. Habitats used by larvae, juveniles, or migrating adults could be altered but spawning habitat for pallid sturgeon is not known to occur in the area of the river near the proposed project area so spawning habitat will not be altered. Additionally, the spatial and temporal extent of pile driving is limited relative to the total habitat available in this river reach.

Pile driving sound characteristics

Impact driving of 36-inch (0.91 m) steel piles typically generates peak sound pressure levels in excess of 180–190 dB re: 1 µPa at 10 m, with cumulative sound exposure levels (SEL) potentially exceeding 183 dB re: 1 $\mu Pa^2 \cdot s$ depending on strike counts (Caltrans 2020; NMFS 2018). Such values are within or above thresholds identified for potential injury or behavioral disturbance to fish. While bubble curtains or cofferdams can attenuate peak levels, unattenuated impact driving of piles of this size is generally

expected to exceed both behavioral and injury thresholds for sensitive fish species as shown in the table below.

Table 6: Noise Thresholds for Fish

	Noise Thresholds	
Functional Hearing Group	Behavioral Disruption Threshold	Injury Thresholds
Fish > 2 grams	150 dB RMS	187 dB Cumulative SEL
Fish < 2 grams	150 dB RMS	183 dB Cumulative SEL; Peak 206 dB
Fish all sizes	150 dB RMS	—

SEL = sound exposure level; unit = 1 dB re 1 $\mu Pa^2 \cdot s$
RMS = root mean square pressure of a single pile-driving impulse
Sources: WSDOT 2018; NMFS 2018

3.7.2.1 Sensitivity of pallid sturgeon

While direct studies on sturgeon hearing are limited, sturgeon are classified as "hearing generalists" and detect particle motion and low-frequency sound up to ~200–300 Hz (Popper and Carlson 1998). Pile driving produces broadband energy with dominant components in the low-frequency range (<1 kHz), overlapping with sturgeon sensitivity (Popper et al. 2014). Sturgeon have swim bladders which makes them more susceptible to barotraumas from impulsive sounds than fish without swim bladders. Juvenile white sturgeon have been found to be more susceptible to barotrauma after initial feeding due to the potential for herniation in their intestines. While the swim bladders partially inflate later in development because of the physiology of the swim bladder in sturgeon, gas transfers from the swim bladder can be released through the sturgeon's mouth (Brown et al. 2013). Although behavioral responses in fish due to elevated underwater sound are not well understood, the responses could include a startle response, delayed foraging, or avoidance of the area. Laboratory and field studies on related species (e.g., lake sturgeon, Atlantic sturgeon) have demonstrated startle responses, temporary avoidance, and in some cases physical injury at SPLs generated by pile driving (Meyer et al. 2020; Hastings and Popper 2005). Behavioral responses of pallid sturgeon are expected to be short-term and intermittent while construction is being conducted (approximately 8-12 hours/day).

3.7.2.2 Mitigation and expected effects

To minimize potential impacts, noise attenuation measures such as bubble curtains or cofferdams should be implemented where feasible (Caltrans 2020). Additional protective measures include limiting in-water work to non-spawning periods (April–June avoidance), soft-start/ramp-up procedures, and monitoring for fish presence during driving. With mitigation, residual impacts to pallid sturgeon are expected to be temporary behavioral disturbance and a very low risk of injury.

Overall, while unmitigated pile driving of 36-inch steel piles produces underwater sound levels above established injury criteria, the limited scale of the Proposed Action and available attenuation methods suggest that cumulative impacts to the pallid sturgeon population would be minor when combined with ongoing navigation and construction noise sources in the river.

3.8 WATER RESOURCES

Desktop analyses were conducted to support this EA, utilizing data from regulatory agencies, such as the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer and the USFWS National Wetlands inventory (NWI). A site visit was conducted on May 19 and 20, 2025.

Water resources analyzed for this EA include surface and groundwater resources. Surface water resources are comprised of ponds, lakes, wetlands, rivers, and streams and are important for a variety of reasons including economic, ecological, recreational, and human health. Groundwater comprises the subsurface hydrologic resources of the physical environment and is an essential resource in many areas. Groundwater is commonly used for potable water consumption, agricultural irrigation, and industrial applications. Its properties are often described in terms of depth to aquifer, aquifer or well capacity, water quality, and surrounding composition.

Water resources are significant because they shape the historical migratory and settlement patterns of nearly all mammals; influence nesting and migration of many bird species; drive landform evolution through erosion; and support critical global systems, including the hydrologic cycle, temperature regulation, and oxygen replenishment. Wetlands are defined by the USACE and U.S. Environmental Protection Agency (EPA) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas" (33 CFR 328.3 [b]; 1984). Wetlands provide a variety of functions including groundwater recharge and discharge; flood flow alteration; sediment stabilization; sediment and toxicant retention; nutrient removal and transformation; aquatic and terrestrial diversity and abundance; and uniqueness. Three criteria are used to define wetlands and their boundaries: vegetation (hydrophytes), soils (hydric), and hydrology (frequency of flooding or soil saturation).

Hydrophytic vegetation is classified by the estimated probability of occurrence in wetland versus upland (non-wetland) areas throughout its distribution. Hydric soils are those that are saturated, flooded, or ponded for sufficient periods during the growing season and that develop anaerobic conditions in their upper horizons (i.e., layers). Wetland hydrology is determined by the frequency and duration of inundation and soil saturation; permanent or periodic water inundation or soil saturation is considered an important force in wetland establishment and proliferation. Jurisdictional wetlands are those subject to regulatory authority under Section 404 of the Clean Water Act (CWA) and Executive Order 11990, Protection of Wetlands.

3.8.1 Affected Environment

Surface Water

The Proposed Action area is located adjacent to the Mississippi River in St. Louis, Missouri. This section of the Mississippi river is connected to a network of rivers, streams, freshwater forested wetlands, freshwater emergent wetlands which connect to several lakes and ponds (USFWS 2025e). The City of St. Louis, Missouri, primarily relies on surface water for its public water supply. The city has two main water treatment plants: the Chain of Rocks Plant on the Mississippi River and the Howard Bend Treatment Facility on the Missouri River. Together, these plants have a combined capacity to treat and distribute 380 million gallons of water per day.

The gage height (i.e. stage) of the Mississippi River at the St. Louis, MO monitoring station (07010000), located approximately three miles upstream from Base St. Louis ranges from around -3 to 24 feet depending on the weather conditions (USGS 2025a). The water level elevation on August 5, 2025, at the Mississippi River St. Louis, MO station was recorded at 397.04 feet. Gage zero was reported at 397.94 feet (USACE 2025c).

According to the Missouri Department of Natural Resources (MDNR) Impaired Waters and Total Maximum Daily Loads (TMDL) Viewer, the segment of the Mississippi River adjacent to the Base St Louis is listed as a TMDL Stream for Chlordane and PCB (TMDL 2006). This Mississippi River segment is not listed as an impaired water. Probable sources contributing to impairment are unknown.

Stormwater and Wastewater Drainage

Under the CWA, the National Pollutant Discharge Elimination System (NPDES) permit program regulates discharges to Waters of the United States (WOTUS), including stormwater, to control water pollution. While the EPA oversees the NPDES program, it has delegated authority to many states, such as Missouri. In Missouri, if a construction project disturbs more than one acre of land, it must obtain coverage under the Missouri Clean Water Law, Permit for Stormwater Discharges from Construction Activities (10 CSR 20-6.200). This permit requires the development of a Stormwater Pollution Prevention Plan (SWPPP) outlining the erosion, sediment, and other pollution control measures that will be used during construction. Additionally, once operational, industrial sites, including military installations, must comply with NPDES regulations for any stormwater discharges related to industrial activities.

In compliance with the Missouri Clean Water Law (Chapter 644 R.S. Mo) and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress), the MDNR requires a Missouri State Operating Permit (MSOP) for wastewater and stormwater discharge from a facility in accordance with effluent limitations and monitoring requirements (MDNR 2025a). In addition, the MDNR issues the Missouri Land Disturbance Stormwater General Operating Permit for activities that disturb one acre or more of land including clearing, grubbing, excavating, grading, filling, and other activities that are reasonably certain to cause pollution to waters of the State (MDNR 2025b). Any government agency planning to work in jurisdictional WOTUS is required to obtain a permit from the USACE under the CWA. Permitting through the USACE is discussed further under Wetlands and WOTUS, below.

Groundwater

The City of St. Louis, Missouri, is primarily situated within the Mississippi and Missouri River Alluvial Aquifers. These are shallow, unconsolidated aquifers composed of sand, silt, and gravel deposited by the rivers. They are hydraulically connected to the rivers, allowing for direct recharge during periods of high streamflow. Beneath the alluvial aquifers, deeper bedrock aquifers are present, including the Mississippian Aquifer. This aquifer consists primarily of limestone formations such as the Keokuk and Burlington Limestones (MDNR 2025c). See Section 3.5 for additional information on the geologic setting of the project area.

Floodplains and Flood Hazards

Floodplains are low-relief valley bottom lands formed by periodic flooding, with their spatial extent defined by statistical flood frequency. According to the FEMA Flood Map Service Center, the project area is within a regulatory floodway special flood hazard area (Zone AE). A Provisionally Accredited Levee (PAL)

system is located at the western extent of the project area. Staging or construction access landward of the PAL is within an area with Reduced Risk Due to Levee (Zone X) (Figure 3-5).

Structures are to be designed and located above flooding elevations at the site location. The existing dock indicates a maximum operating level of +421.50', which is above the major flood elevation per NOAA at +419.58' NAVD'88. All new waterfront infrastructure shall accommodate a flood elevation of at least +419.58' NAVD'88.

In Missouri, floodplain development is administered locally under community floodplain ordinances. Any development in mapped flood hazard areas (Zones A/AE) requires a local Floodplain Development Permit. For state-owned or state-financed projects, a Missouri State Emergency Management Agency (SEMA) Floodplain Development Permit is required under Executive Order 98-03. The USCG should coordinate with the project jurisdiction's Floodplain Administrator for community-specific requirements and with SEMA as needed.

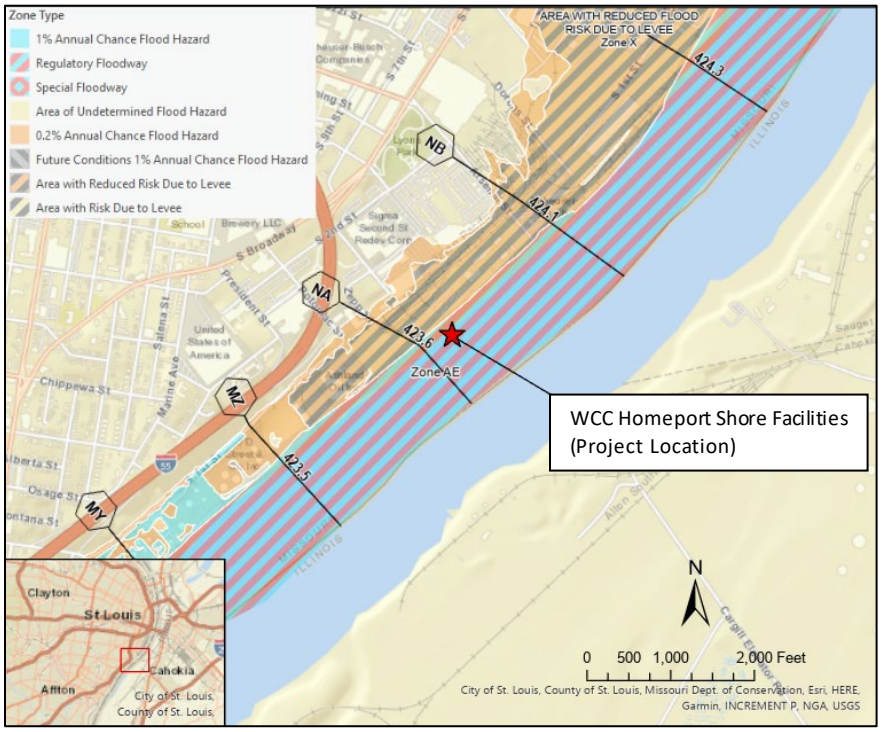

Figure 3-5: FEMA Floodplain Map (National Flood Hazard Layer)

Wetlands and Other Waters of the United States

USACE administers both Section 10 of the Rivers and Harbors Act of 1899 (RHA) and Section 404 of the CWA. Section 10 prohibits the unauthorized obstruction or alteration, including temporary work activities, of any navigable waters below the ordinary high-water mark (OHWM) for non-tidal waters. Section 404 requires authorization from the Secretary of the Army, acting through USACE for discharge of dredged or fill material into all WOTUS, including wetlands. Discharges of fill material include placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for its construction; property protection devices such as riprap or revetments; beach

nourishment; and any other work involving the discharge of fill or dredge material. Any proposed fill would require a USACE permit (Nationwide Permit, Standard Permit, or Letter of Permission).

The existing facility and structures are partially located below the OHWM of the Mississippi River, which is a navigable WOTUS regulated by USACE under Section 10 and Section 404. The Mississippi River at the project area has been mapped by USFWS as a riverine deepwater habitat coded as R2UBHx, or riverine (R), lower perennial (2), unconsolidated bottom (UB), permanently flooded (H), and excavated (x). The river system flows continuously year-round and is characterized as a low gradient with sand and mud substrates. Oxygen deficits may sometimes occur (USFWS 2025e).

The shoreline from the water level to the OHWM is characterized by medium to large bounders (riprap) atop clay, silt, and fine sand. The channel is well defined with a steep embankment lacking riparian vegetation. Forested vegetation occurs at higher upland elevations along the riverbank, but no wetlands were found in the forested/shrub areas during the site visit.

Coastal Zone Management

The project area is located outside of the coastal zone boundary. Therefore, the Proposed Action area is not anticipated to impact the coastal zone.

3.8.2 Environmental Consequences

The following criteria were used to assess effects to surface water and drainage, groundwater, floodplains, and wetlands and other WOTUS:

- The alternative would have an adverse effect on surface water and drainage if it threatens or damages unique hydrologic characteristics, reduces water availability, causes an exceedance of a total maximum daily load (TMDL), changes the impairment status of a surface waterbody, or interferes with the water supply of existing users. Such effects would be considered significant if they result in permanent impacts. If the impacts are temporary in nature, the effects would be considered less than significant.
- The alternative would have an adverse effect on groundwater if it substantially depletes groundwater supplies, interferes with groundwater recharge, or causes detrimental impairment to groundwater quality. Permanent impacts would constitute a significant effect, while temporary impacts would be considered less than significant.
- The alternative would have an adverse effect on floodplains if it threatens or damages unique hydrologic characteristics, creates or worsens health hazard conditions that could endanger public health, or violates established laws or regulations intended to protect floodplain areas. Permanent impacts would be considered significant, while temporary effects would be considered less than significant.
- The alternative would have an adverse effect on wetlands and other WOTUS if it results in the placement of fill, structures, or other discharges within WOTUS; alters WOTUS through activities such as dredging or excavation; or permanently reduces or diminishes the quality, functions, or values of WOTUS. The effect would be significant if it results in permanent degradation of WOTUS that cannot be mitigated, or if permanent impacts require BMPs or compensatory mitigation to offset the loss.
- The alternative would have a beneficial effect on the listed resources if it leads to an improvement or increase in the quality, function, or extent of these resources.

3.8.2.1 Proposed Action

Surface Water and Drainage

The Proposed Action area would have minor adverse effects on surface water quality during construction of the upgrades/installation of utilities in the uplands to the floating dock, construction of an extension of the existing roadway to south, addition of a fixed trestle and articulating ramp, addition of a new crane and crane foundation on the floating dock, replacement of segments of the floating dock (in-kind), replacement of the personnel walkway (in-kind) at the existing floating dock, and the addition of a new wider floating dock with new mooring piles. Dredging is not included in Proposed Action's activities. Long-term and permanent effects include the proposed clearing of a small portion of forested/shrub land for ramp access, and trenching of utility lines, which may result in a slight increase in surface water runoff in the project vicinity. The area of land disturbance proposed is less than one acre, therefore a Missouri Land Disturbance Stormwater General Operating Permit is not required.

The majority of effects would be temporary and short term. Potential short-term effects could include the following:

- Increased runoff and turbidity levels associated with disturbance of sediments during demolition and construction of in-water structures. Disturbance of sediments and water column could mobilize stagnant or bound contaminants.
- Minor increase in potential for fuel and oil spills to impact the Mississippi River from demolition and construction of in-water structures.

The USCG's standard contract provisions for construction projects required BMPs to be used such as those listed in Section 5 to avoid and minimize potential adverse effects on surface water quality. Prior to project activities, sediments anticipated to be disturbed by project activities would be sampled and tested for contaminants, including petroleum, PCBs, and polycyclic aromatic hydrocarbons (PAHs). While no known contamination at the Arsenal St. site within the project area or USACE property, discovery of any potential hazardous materials or contaminated sediment or water will be reported immediately so that testing and protection of receptors may be initiated. Short-term construction impacts associated with the Proposed Action area will occur within the immediate area of the Mississippi River around the construction site. With the use of BMPs identified in Section 5, the Proposed Action area would have minor adverse effects on surface water quality if in-water construction disturbs contaminated soils. Turbidity curtains could be used if the river flow velocity and other conditions are conducive to their use. If used, they would limit the extent of turbidity and promote the rapid settling of suspended sediments to the substrate. Sediment sampling results would determine the final disposal method for any captured material. All activities would be conducted in compliance with applicable state and federal water quality standards.

Ground-disturbing activities associated with the Proposed Action will include construction within and adjacent to the Mississippi River. Construction activities have the potential to impact local water quality through surface water runoff from upland areas and sediment disturbance during in-water construction. The implementation of BMPs will reduce potential impacts associated with these activities, including deployment of debris booms and, if conditions are conducive, silt curtains around the proposed in-water work area.

The Proposed Action is intended to increase operating capabilities at Base St. Louis. The proposed work is needed to support operations for new purpose-built WCCs in St. Louis, MO. In-water construction is not

anticipated to adversely affect other nearby surface water resources in the long term. Therefore, implementation of the Proposed Action area will result in minor short-term impacts on water resources.

Groundwater

The Proposed Action area will not substantially alter the permeability of surfaces or surface area available for groundwater recharge. Most elements of the Proposed Action area will occur within a previously developed area. No new water supply wells will be constructed, and no changes to groundwater withdrawal will be expected. Therefore, implementation of the Proposed Action area will have a negligible impact on groundwater resources.

Floodplains

Existing facilities at the Proposed Action area project area are located within the delineated boundaries of the 500-year floodplain, regulatory floodway, levee, and areas with reduced flood risk due to the levee. The existing and proposed land-based structures are located within the regulatory floodway. The existing dock indicates a maximum operating level of +421.50 feet, which is above the major flood elevation per NOAA at +419.58' (NAV 88). All the new proposed infrastructure will be at an elevation of at least +419.58' (NAV 88). Proposed construction will not introduce any new obstructions that will impede or divert the flow of floodwater. Therefore, the Proposed Action area will result in negligible impacts on floodplain management.

Wetlands

The existing facility and structures are partially located below the OHWM of the Mississippi River. Silt fencing or turbidity curtains will be installed where appropriate to prevent offsite sedimentation and to maintain water quality standards. An RHA Section 10 Permit from USACE will be obtained prior to the commencement of any construction activities within navigable waters. No wetlands or WOTUS, except the river, were identified within the Proposed Action area project area, therefore a CWA Section 404 is not required for the Proposed Action.

3.8.2.2 No Action

If the No Action Alternative were selected, the Base St. Louis will not be expanded and no impact to the water resources of the surrounding area would occur.

3.9 TRANSPORTATION, NAVIGATION, ACCESS

3.9.1 Affected Environment

The Proposed Action is located on the Middle Mississippi River through the City of St. Louis (river reach corresponding to the Gateway Arch / downtown St. Louis riverfront, near USACE mile markers ~179–180). The Mississippi River in this reach is the primary commercial navigation corridor through the St. Louis region; the USACE St. Louis District maintains a 9-foot navigation channel through this segment (USACE 2024). The USACE St. Louis District maintains channel dimensions, buoys, and aids to navigation and provides services to support commercial transits. The USACE Waterborne Commerce Statistics Center (WCSC) is the authoritative source for vessel and tonnage statistics for inland river commerce. According to WCSC, the reach supports a mix of commercial, passenger, and recreational traffic. Commercial tows transport bulk commodities such as grain, petroleum, aggregates, chemicals, and other bulk cargo and

are the dominant users of the waterway (USACE WCSC 2023; BTS 2022). Passenger excursion boats operate from the downtown levee and Gateway Arch riverfront (Gateway Arch Riverboats 2023). Recreational vessels, including powerboats and kayaks, also use this section of the river (St. Louis City Port Authority 2023).

The St. Louis metropolitan port area is one of the highest-volume inland port districts in the nation. St. Louis area ports handled nearly 26 million tons of cargo in 2022, making the region among the most efficient inland port districts on a tons-per-river-mile basis (USACE WCSC 2023; BTS 2022).

Commercial traffic in this reach commonly consists of multi-barge tows. On the Upper Mississippi, a standard tow configuration is three barges wide by five long (15 barges), with an overall length of 1,000 to 1,200 feet. Larger tows are more common south of St. Louis. These tow sizes are routine on the Middle Mississippi River and represent a significant physical presence in the channel (USACE 2019; AWO 2021).

Onsite parking is currently limited at the Arsenal St. location in the upland area. The parking currently is shared with the USACE St. Louis Base facility parking onsite.

3.9.2 Environmental Consequences

3.9.2.1 Proposed Action

Construction activities such as pile driving, barge staging, tug operations, and mooring would temporarily occupy portions of the nearshore zone. The construction zone is not anticipated to extend into the navigation channel. Potential impacts include short delays for commercial tows that must wait or slow during active construction, temporary channel restrictions imposed by the USCG, and increased risk of vessel interaction forces between passing tows and work barges if work platforms are not adequately moored and marked (USCG 2019).

Increased vessel maneuvering in the project vicinity during construction may increase navigational complexity. Large tows have limited maneuverability, and safe passage requires predictable, clearly marked construction zones and communication with pilots (AWO 2021). If materials are delivered via truck to the riverfront, short-term increases in roadway traffic may occur on local access roads. These impacts would depend on the contractor's haul routes and staging arrangements. Onsite transportation impacts would include additional personnel requiring parking onsite which will further constrain already limited parking. As there is no space at the existing facility to construct additional parking facilities, USCG personnel will have to park off-site or the facility can utilize neighboring parking from another facility if an agreement is made. Impacts to onsite parking and upland transportation due to this personnel increase would be minor and long-term.

All required notices of construction vessels and impacts to safety operation zones would be coordinated by USCG through the Notice to Mariners, Additionally, coordination and permitting through the USACE St. Louis District would be completed prior to construction, which will include any special conditions for the Proposed Action to reduce the impact to navigation and transportation. Overall, the Proposed Action would have temporary and minimal effects to waterway transportation, navigation, and access.

3.9.2.2 No Action

If the No Action project is selected, there would be no proposed construction and therefore there would be no new impacts to transportation or navigation beyond the existing operations of the WCCs and maintenance facility on the site.

3.10 Land Use, Surrounding Land Use, and Zoning Analysis

Land use and zoning provide important context for evaluating the potential environmental effects of the Proposed Action. This section describes existing land use conditions within the project area and surrounding vicinity, identifies applicable zoning classifications and land use plans, and assesses the Proposed Action's consistency with local and regional planning objectives, as applicable. The analysis also considers whether the Proposed Action would result in land use conflicts, require changes to zoning or permitting, or contribute to cumulative land use trends in the region.

3.10.1 Affected Environment

The project area is located along the west bank of the Mississippi River near downtown St. Louis, Missouri, at an existing USCG riverside operations facility. The site is currently developed and used for federal maritime and navigational operations, including vessel mooring, river traffic management, and support facilities. The land is federally owned by the USACE and leased by the USCG.

Surrounding land uses are primarily industrial, transportation, and commercial in nature:

- North: Industrial and maritime operations, including barge fleeting and facilities managed by the USACE.
- South: Additional barge fleeting areas and river-dependent industrial activities along the Mississippi River.
- West: Rail infrastructure, warehouse/distribution facilities, and commercial/industrial parcels associated with the St. Louis riverfront.
- East: The Mississippi River, which supports active barge traffic and navigation.

The project area is zoned "K Unrestricted District" for industrial and riverfront commercial uses under the City of St. Louis zoning code (City of St. Louis 2025a), which is consistent with its current operational use. Adjacent parcels are similarly zoned for industrial, transportation, and maritime activities.

According to the City of St. Louis 2025 Strategic Land Use Plan, this portion of the riverfront is designated for continued industrial, transportation, and port-related uses. Regional planning identifies the Mississippi River as a working waterfront, with policies aimed at preserving river-dependent industry and sustaining navigation infrastructure that supports continued maritime operations (City of St. Louis 2025b).

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

Implementation of the Proposed Action would involve upgrading and expanding the existing USCG riverside operations facility. Because the project area is already developed and used for federal maritime operations, the proposed activities would remain consistent with existing land use and zoning designations.

- Direct Effects: No conversion of land from one use to another would occur. The Proposed Action would continue the existing federal operational use of the property and would alter adjacent industrial, transportation, or river-dependent uses. The barge fleeting area to the south of the Proposed Action would be required to move or relocate one row of barges. Tentative coordination and agreements with the owner of the barges are ongoing and indicate that moving the barges would not cause undue impacts to their operations.
- Indirect Effects: The Proposed Action would not induce changes in surrounding land uses or encourage incompatible development. The operations are compatible with adjacent industrial and maritime uses along the riverfront (City of St. Louis 2025b).
- Consistency with Plans: The Proposed Action is consistent with the City of St. Louis 2025 Strategic Land Use Plan and zoning designations for riverfront industrial and transportation use (City of St. Louis 2025b).

3.10.2.2 No Action

Under the No Action Alternative, the USCG would not upgrade or expand its existing riverside operations facility. Land use within the project area and surrounding vicinity would remain unchanged. No impacts to land use or zoning would occur.

3.11 Cumulative Impacts

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 actions (40 CFR 1508.7)."

Analysis of cumulative effects in this EA has been limited to proposed projects or recently approved projects in the immediate Mississippi River area. Since the Proposed Action is limited to waterfront facility work and construction on the Mississippi River shore and waterfront with limited upland improvements, other actions considered in this section have been limited to those with similar components on the Mississippi River within a 2-mile radius (collectively upstream/downstream) of the USCG St. Louis Arsenal St. site. Table 7 lists the actions included in the cumulative effects analysis.

Table 7: Cumulative Projects Considered

Project	Status	Description	Resources Affected
Gateway South Redevelopment Project	Phased development starting 2025–2026	100-acre, $1.2B redevelopment immediately south of the Arch grounds (between Chouteau's Landing and the former industrial riverfront)	Transportation, Navigation, Water Resources, Biological Resources
Ongoing USACE Dredging & Channel Maintenance	Ongoing	Conducted continuously in the river reach	Transportation, Navigation, Water Resources, Biological Resources
USACE Rivers Project Master Plan Update	Draft EA & FONSI in public review (2025)	Conceptual management of lands/waters in Middle/Upper Mississippi	Transportation, Navigation, Water Resources, Biological Resources
Valvoline Terminal Repair	Submitted 6/5/2025	408 review for repair/construction operations	Transportation, Navigation, Water Resources,
Metropolitan Sewer District, St Louis Flood Protection, MO	Submitted 1/1/2025	408 review for civil works project	Transportation, Navigation, Water Resources,
ADM Grain Sauget Dredge Permit Mississippi River Mile 177.5	Issued July 2012	Potential for maintenance dredging of the area	Transportation, Navigation, Water Resources,
St. Louis Fire Boat Mooring	Issued March 2016	Mooring of fire boats at dock located across from project site	Transportation, Navigation
St Louis District Service Base Fleet Moorings Mississippi River mile 177	Issued June 2011	USACE facility is adjacent to project site. Operations include moorings of vessels	Transportation, Navigation, Water Resources,
SCF Fleeting UMRM 177	2011	Fleeting facility adjacent to the project site	Transportation, Navigation, Water Resources,

Sources: City of St. Louis 2024; USACE 2023; USACE 2023b; USACE 2025; USACE 2019

3.11.1 Short-Term Cumulative Effects

Cumulative short-term consequences of the Proposed Action, when considered alongside other ongoing or reasonably foreseeable projects in the St. Louis reach of the Mississippi River, include temporary increases in construction vessel traffic, localized turbidity, underwater noise, and minor constraints on navigation. These short-term impacts would overlap in time and space with other in-water work such as ongoing maintenance dredging, riverfront infrastructure improvements, and periodic barge fleeting or mooring upgrades, if constructed at the same time. Additionally, the portions of the projects assessed that occur directly on the waterfront area or within waters of the Mississippi River, including added vessel activity or operation, would add cumulative effects with the proposed action. Because each of these actions is of limited duration and subject to USACE and U.S. Coast Guard safety coordination, the cumulative short-term effects are expected to consist primarily of minor, localized disruptions to navigation and temporary water quality and acoustic disturbances that are not considered significant regional consequences. Short term cumulative effects due to the project are considered localized, adverse, and negligible.

3.11.2 Long-Term Cumulative Effects

Cumulative long-term consequences of the Proposed Action, when added to other existing and planned improvements along the Mississippi River corridor in the St. Louis region, include incremental increases in built shoreline infrastructure and the permanent occupation of small portions of the riverbank and nearshore zone by docks, mooring structures, and associated facilities as well as increased vessel presences and traffic in this reach of Mississippi River. Over time, these incremental additions may contribute to reduced natural bank habitat and increased intensity of commercial and recreational use of the waterway. However, given the small footprint of the proposed dock relative to the overall riverfront, the ongoing maintenance of the federally authorized navigation channel and existing regulatory constraints on large-scale development within the river, the cumulative long-term consequences are anticipated to be negligible to minor and not significant at the scale of the Middle Mississippi River system.

4 CONCLUSION

This EA concludes that there would be no significant adverse impacts to the local physical and natural environment from implementing the Proposed Action with adherence to federal, state, and local laws and regulations, as well as avoidance and minimization measures and BMPs specified in this EA. Therefore, an EIS is unnecessary for implementing the Proposed Action, and a Finding of No Significant Impact (FONSI) is appropriate.

The Proposed Action will result in temporary impacts from construction on biological resources, noise, sediment and water quality, and navigation. Additionally, the Proposed Action will result in substantial long-term beneficial impacts on navigation safety. This alternative will satisfy the purpose and need for the Proposed Action to establish facilities in St. Louis that provide two homeport berths and one maintenance berth, ensuring the USCG can immediately support the operational requirements of the incoming WCCs while phasing out legacy cutters. The need for the Proposed Action arises from constraints at the current homeport and depot-level maintenance facilities, which are inadequate to meet the loading requirements of the new WCCs and to provide the dock frontage necessary to moor the WCCs safely under all conditions.

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

5 SPECIAL PROCEDURES

5.1 AGENCY AND PUBLIC INVOLVEMENT

Evaluation of the potential environmental impacts has been conducted during preparation of this Draft EA. It has been proposed that no significant environmental impacts will result from implementation of the Proposed Action. Pursuant to the requirements of NEPA (40 CFR 1506.6, 2021), this EA is subject to public involvement. The USCG initiated agency and public comment for the Project from federal, state, and local agencies, Tribal organizations, and interested community members with a Notice of Availability of the Draft EA posted on the USCG Office of Environmental Management, Environmental Planning and Historic Planning webpage public notices page. The Draft EA was circulated for a minimum 30-day public comment beginning January 5, 2026. The USCG also notified agencies and Tribes via emailed letter on January 12, 2026 to encourage interested parties to review the proposed action and provide comments or additional information during the 30-day review period.

Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," requires inviting federally recognized Tribes to participate in NEPA and the National Historic Preservation Act (NHPA) Section 106 process as Sovereign Nations based on their potential ancestral ties to the Proposed Action area. In January 2026, USCG initiated consultation for the Proposed Action with identified Tribes and the State Historic Preservation Officer (SHPO) under Section 106 of the NHPA. Consultation with MO SHPO was concluded on March 27, 2026. Comments for the Project received from Tribes are included in Appendix B.

Consultation with USFWS under Section 7 of the Endangered Species Act was initiated on January 12, 2025. A Letter of Concurrence was received from USFWS on January 13, 2025. Implementation of the Proposed Action will occur in accordance with measures required by the USFWS, USACE, and the State of Missouri. Best Management practice noted below include specific practices identified within response letters and guidance received from USFWS and MO DNR. Refer to Appendix B for all received agency and public comments and the USCG responses.

5.2 BEST MANAGEMENT PRACTICES

Implementation of best management practices implemented for the Proposed Action may include: control measures for reducing construction air emissions, engineering and site work to mitigate stormwater runoff, mitigation of impact driven noise impulses, and conformance with all federal, state, and local requirements.

In accordance with established protocols, procedures, and requirements, the USCG would implement BMPs and adhere to all regulatory requirements in association with the Proposed Action. BMPs are included as components of the Proposed Action, including all action alternatives, and described below. BMPs are regulatory compliance measures that the USCG regularly implements as part of their activities, as appropriate. These differ from "mitigation measures", which are defined as project-specific requirements, not routinely implemented by the USCG, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels. As no adverse environmental

impacts have been determined to be potentially significant, no mitigation measures would be required for the Proposed Action.

The Proposed Action takes place primarily in the aquatic environment, which contains sensitive habitats and species that require special consideration to protect them from incidental harm during construction activities. The Proposed Action includes a number of conservation measures that were developed with technical assistance from the USFWS during preparation of this EA or through review of historic agency authorizations (e.g., USACE). In addition, the USFWS *Recommended Standard Best Management Practices* (2022) and *Nationwide Avoidance & Minimization Measures for Birds* (2024) were included, if applicable. Any other measures that are required during project-specific reviews by relevant agencies will also be incorporated. The USCG would initiate pre-application coordination with USACE to determine the type of permit required. Possible permit conditions will be determined after the required permit documentation is filed.

Main BMPs to avoid or minimize effects to the environment are listed below. These BMPs may change based on coordination with USACE and other regulating agencies.

Air Quality and Climate

The USCG would ensure that Proposed Action activities are performed in accordance with applicable state and federal regulations, to ensure that no exceedance of thresholds occurs. Reasonable precautions would be taken to prevent particulate matter, such as fugitive dust, from becoming airborne. Available methods to reduce the potential impact of particulate matter or release of other emissions may include:

- Require and enforce low transit speeds for equipment on unpaved surfaces.
- Use fossil fuel-efficient equipment with emission controls.
- Clean all equipment and vehicles to prevent off-site transport.
- Minimize dust generation by implementing dust control measures, such as periodic watering of exposed soil, wet-cutting concrete, and cleaning surfaces by wet mopping.
- Ensure the use of paints, solvents, adhesives, and cleaners comply with local VOC laws and regulations
- Construction, demolition, and trade waste will not be open burned, except for untreated wood.

Geology and Soils

- Turbidity and siltation from project-related work should be minimized and contained within the project area by using bioengineering controls, silt containment devices and curtailing work during flooding or adverse weather conditions. BMPs should be maintained for the life of the Proposed Action until turbidity and siltation within the project area are stabilized.
- All deliberately exposed soil or underlayer materials used in the Proposed Action near water should be protected from erosion and stabilized as soon as possible with geotextile, filter fabric silt fencing or native or non-invasive vegetation matting, hydro-seeding, etc.
- Avoid soil contamination by using drip pans underneath equipment and containment zones at construction sites when refueling vehicles or equipment.

Water Resources and WOTUS

- All construction-related materials and equipment (e.g., vessels, silt curtains, backhoes, etc.) to be placed in an aquatic environment should be inspected for pollutants (e.g., oil) or undesirable aquatic species (e.g., zebra mussels) and cleaned to remove prior to use.
- Provide silt curtains around limits of work during all phases of work. The silt curtain shall be positioned to enclose the work area to minimize turbidity; extend below water to within 2 feet of mudline at MLLW; and be suitably anchored to prevent movement.
- Designate upland or barge areas for storage of materials. Store project construction-related materials (e.g., fill, rock, pipe) away from aquatic habits to protect erosion and prevent release into waters by wind, rain, or high-water levels. Any work surface on a barge or pier shall include a containment basin for pile and any sediment removed during construction, dredging, or piling.
- Fueling of vehicles and equipment should take place away from the aquatic environment, when practical. Develop and implement a spill contingency plan to control petroleum products accidentally spilled during the project.
- Take care to minimize debris, including sawdust and concrete rubble, from entering water during demolition or construction.
- Deploy in-water debris boom and turbidity curtain around all active work areas and equipment to control debris and meet water quality requirements.
- Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation will be stabilized and re-vegetated as soon as is practicable.

Biological Resources

The USCG would implement the BMPs identified under *Water Resources* and *Geology and Soils* to protect aquatic wildlife and habitat and minimize potential effects. In addition, the USCG would implement the following conservation recommendations, as outlined by USFWS, USACE, MDC, and MDNR to minimize adverse effects to biological resources:

- Avoid in-stream work that disturbs the substrate from March 1 to June 30.
- Schedule timing of in-channel disturbance (e.g., pile driving) to avoid sensitive aquatic life events (e.g., spawning).
- Modify the Proposed Action to avoid effects to suitable bat roosting and foraging habitat, such as caves, culverts, bridges, large-diameter tree species, etc.
- Retain standing dead trees for roosting habitat for birds and bats. Limit vegetation removal to the amount practicable to minimize effects to riparian areas and avoid habitat loss.
- Conduct pre-clearance surveys to visually inspect bridges and structures for individuals, roosts, or nests no more than three days prior to construction or demolition. Notify the MDNR and/or USFWS if roosts or nests are encountered and need removed.
    - Establish a buffer zone by constructing a barrier (e.g., plastic fence) around known nests. If it is not feasible, contact USFWS for guidance to minimize effects or to obtain a permit.
- Clearly delineate and maintain boundaries to avoid encroaching outside project area disturbance footprint.
- Schedule all vegetation removal, trimming, and grading of vegetated areas outside of the peak bird breeding season (generally February 15 through August 31) to the maximum extent practicable.

- Use physical or visual deterrents (e.g., plastic owls) to deter birds from nesting in disturbance areas or on structures where electrocution is a risk.
- Prepare a noxious weed abatement plan that outlines the areas where weed abatement is required and the schedule and method of activities to ensure bird effects are avoided.
- For temporary and permanent habitat restoration, use only native and local seed and plant stock, when possible.
- Create vehicle and equipment wash stations to prevent accidental introduction of non-native plants.
- Limit construction activities to daylight hours to avoid the illumination of adjacent habitat areas. Use down shielding or directional lighting to avoid light trespassing into bird habitat. Avoid the use of bright white light, such as metal halide, halogen, fluorescent, mercury vapor and incandescent lamps.
- Prevent increase in lighting of native habitats during the bird breeding season.
- Minimize bird collision risk with project infrastructure (temporary and permanent) by increasing visibility through appropriate marking and design features (e.g., wire marking).
- Reduce and properly manage and store waste (e.g., food) to prevent opportunistic avian predators and scavengers. Provide enclosed solid waste receptacles at project area.
- If vibratory extraction is used as a method for pile removal, follow a “ramp-up” procedure to protect aquatic wildlife. Sound should be initiated for 15 seconds at reduced energy followed by a 1-minute waiting period. Repeat this procedure two additional times.
    - Use “wake up” procedures to break the bond with the pile and sediment through vibrations, to avoid pulling out large blocks of soil.
    - Properly train the crane operator to remove piles slowly to minimize turbidity in the water column as well as sediment disturbance.
- Prevent the increase in noise above ambient levels during the nesting bird breeding season.
- Channel island tips should not be altered in any manner since pallid sturgeon appear to show a strong affinity for this habitat.
- Channel alterations that limit or eliminate shallow, sloping bank habitat should be avoided.
- Dams and other impoundment structures should be prohibited in major rivers to prevent further altering habitat for the pallid sturgeon and other aquatic species.
- Maintain open, moist, early successional habitat that receives periodic inundation from Mississippi River floodwater. Established populations need newly disturbed areas in which to spread.
- Occasional cultivation may benefit asters through soil disturbance. Asters are often located in wet lowland agricultural fields. These marginal areas should be avoided in wet years unless woody vegetation becomes established. Periodic disturbance will be needed to keep a site suitable for the aster.
- The wetland areas where decurrent false aster is found need to be protected in order to protect its habitat. Many aster populations are started when seeds float downstream and become established on riverbanks or in muddy backwater areas. Do not disturb these sites after flooding.
- Resurvey following significant flooding as decurrent false aster populations are frequently redistributed by flood waters.
- Use cutting, prescribed burns, or herbicides to reduce colonization of sites by cottonwoods, willows, and other wetland woody species.

- Low, wet areas of agricultural fields occupied by decurrent false aster should be cultivated only with adequate frequency to prevent succession to heavy shade-producing species, perhaps every third year.
- Comply with applicable federal and state laws when applying pesticides or herbicides to vegetation.

Health and Safety

All waste generated during the Proposed Action would be properly disposed of at permitted waste facilities. The USCG would take precautions to minimize the risk of spills and address or report spills that may occur. Fire hazards from vehicles and human activities would be mitigated (e.g., use of spark arrestors on power equipment). The USCG would ensure that all personnel on site comply with OSHA safety and health standards.

Air

No special procedures are required. Impacts are anticipated to be negligible with implementation of standard best management practices, such as implementation of control measures for reducing fugitive dust emissions, and conformance to federal, state, and local requirements.

Noise

The USCG would implement BMPs as appropriate to limit noise effects during project activities, including complying with noise ordinances. If noise levels exceed local ordinances, noise reduction measures, such as installing mufflers on motorized equipment and reducing hours of operations, would be implemented. All equipment would be operated according to the manufacturer's recommendations and would be shut down when not in use.

Transportation and Traffic

The contractor will prepare a Construction Management Plan (CMP) to ensure public safety and to limit potential effects to traffic. The CMP will include, but not be limited to, construction and construction worker vehicle parking and access routes; use of enclosed storage areas; nightly removal of equipment to a designated area; and stationing of a flagman to control construction traffic. Navigation impacts in the Mississippi River area will be minimized through required vessel notifications from USCG and USACE as necessary.

Cultural and Historic Resources

If a submerged archaeological site or artifact is inadvertently uncovered during implementation of the Proposed Action, all activities would be immediately halted until a proper archaeological assessment can be made. The USCG would notify the Missouri Advisory Council on Historic Preservation (MOACHP), SHPO Archaeologist, and appropriate THPO as necessary, within 24 hours. In the unlikely event that human remains are found during construction of implementation of the Proposed Action, work would cease immediately, and the county coroner and the MOACHP would be contacted.

6 CONSULTATION WITH REGULATORY AGENCIES

The following local, State, and Federal agencies or individuals were contacted for preparation of this EA. Copies of the correspondence are available in Appendix A.

Table 8: Correspondence and Consultation Summary Table

Agency or Group	Regulation/NEPA	Receiving Branch/Contact
USFWS	ESA Section 7 & FWCA	Missouri Ecological Services Field Office
US EPA	NEPA Coordination	Region 7 NEPA Program Director
MoDNR	Cooperating State Agency	Division of Environmental Quality, DEQ General NEPA Inquiries
MoDNR	Section 401 Certification	Water Protection Program
SHPO	Section 106	St. Louis Cultural Resources Office
Osage Nation	Section 106	THPO Dr. Andrea A. Hunter
Missouria and Otoe-Missouria Tribe of Indians	Section 106	THPO Elsie Whitehorn
Quapaw	Section 106	THPO Billie Burtrum

Copies of received agency consultation letters and any comments and correspondence with interested parties, as well as the USCG responses are provided in Appendix B.

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Appendix A
Agency Correspondence

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

Planning & Real Property Branch Chief
United States Coast Guard
Civil Engineering Unit Cleveland

1240 East Ninth Street,
Room 2179
Cleveland, OH 44199-2060
Phone: 216-902-6200

5090/25-169
December 30, 2025

Dear Interested Party:

The U.S. Coast Guard (USCG) currently maintains an inland vessel fleet to enable establishment, maintenance, and repair to aids to navigation (ATON) in interior waters largely inaccessible by other larger and geographically dispersed ATON maintenance units. These inland tenders are also charged with providing quick and effective response to emergencies (e.g., environmental incidents and severe weather events). However, evaluation of these tenders has determined that the vessels have reached the end of their operational service lives. In response, the USCG has initiated the Waterways Commerce Cutter (WCC) Acquisition Program to replace its inland tender fleet with next-generation cutters.

The USCG's Base St. Louis moorings – located on a US Army Corps of Engineers (USACE) site at 100 Arsenal St., St. Louis, MO – is an existing homeport to legacy river buoy tenders (WLR) Coast Guard Cutters (CGCs) GASCONADE and CHEYENNE. The upland facilities and waterfront are leased by the USCG from the USACE. Under the WCC Acquisition Program, both CGCs GASCONADE and CHEYENNE are planned to be replaced by next-generation WCC-WLRs.

The existing waterfront facilities and moorings at Arsenal St. do not meet the design and operational requirements for the future WCC-WLRs and the Base St. Louis maintenance operations which serve the homeported and other cutters in the region. The purpose and need of the Proposed Action is to establish facilities in St. Louis that will provide two homeport berths and one maintenance berth, ensuring the Coast Guard can immediately support the operational requirements of the incoming WCCs while phasing out legacy cutters. The need for the proposed action is based in the constraints of the current homeport and depot level maintenance facilities in St. Louis to meet the loading requirements of the new WCCs and required dock frontage to moor the WCCs safely under all conditions.

The USCG Proposed Action includes the following components to be constructed at the project location:

- Upgrades to electrical and utilities (water, sewer, and fiber);
- New crane and added crane foundation on the existing pier to support the existing maintenance facility;
- Install new 36-inch piles to support crane foundation; Add fixed trestle and articulating ramp to new floating docks;
- Extend existing roadway to south to the location of the new trestle;
- Replace in-kind floating dock at the maintenance facility (225 linear feet);

- Replace in-kind the personnel walkway (gangway) at the existing floating dock;
- Install 10 new mooring piles with 36-inch diameter plumb and 2 new 30-inch diameter batters at each mooring piles; and,
- Install new wider floating dock (40 feet wide by 515 linear feet).

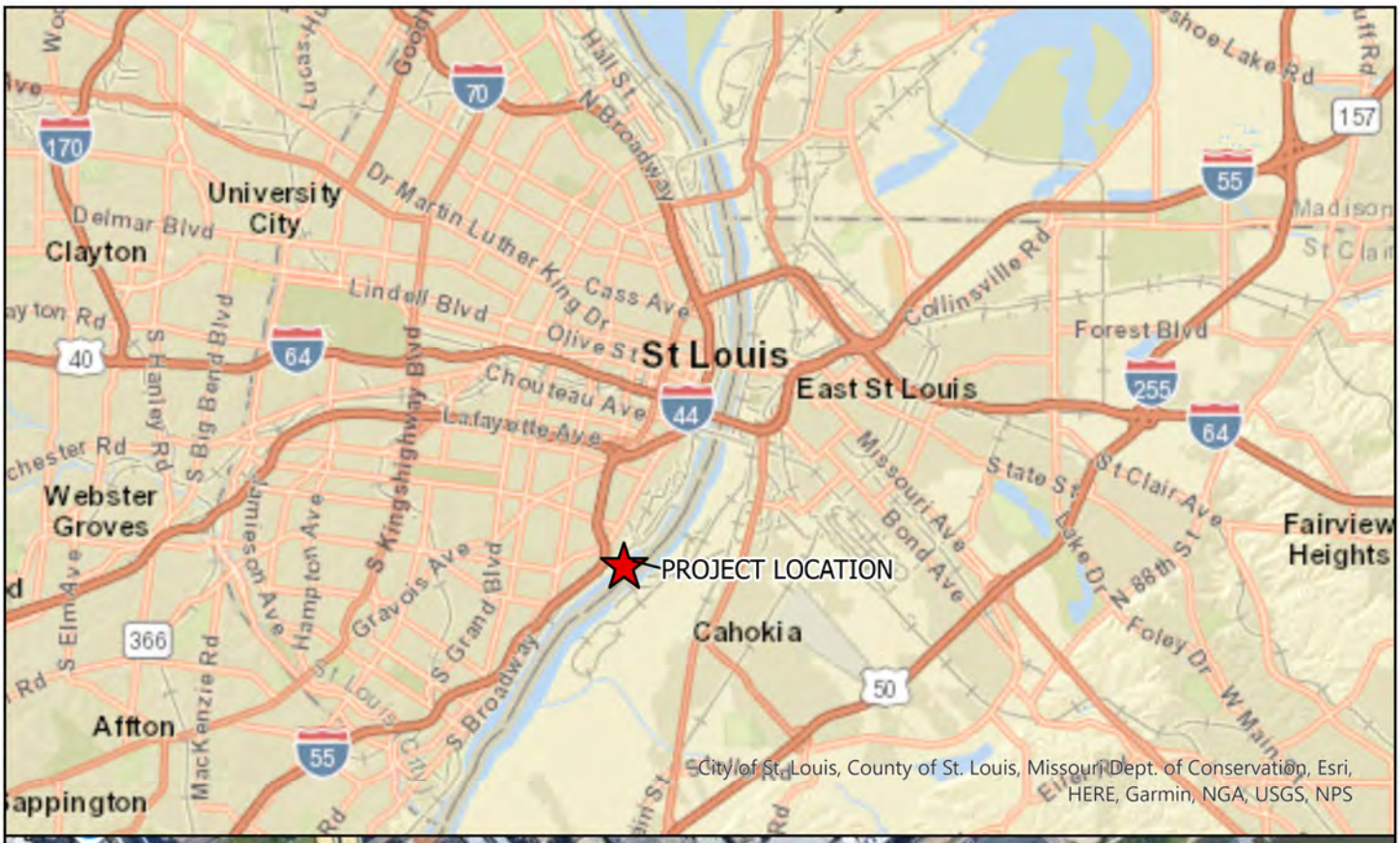
Pursuant to the National Environmental Policy Act (NEPA), the USCG has prepared a Draft EA that evaluates the potential effects on the environment from the proposed construction alternatives as well as the No Action Alternative. The Draft EA includes the purpose and need for the in-water modifications project; a detailed description of alternatives under consideration; the affected environment; environmental consequences of implementation of the alternatives; and cumulative effects of the project.

The USCG respectfully requests that your agency or organization review the Draft EA, which will be posted by the USCG Office of Environmental Management, Environment Planning and Historic Planning web page available at Environmental Planning and Historic Preservation. Please provide any comments related to the technical sufficiency and adequacy of the EA to Ms. Courtney Gerken by e-mail at courtney@lloydeng.com. We ask that comments be received no later than February 13, 2025.

Sincerely,

Justin S. Davis, Lieutenant Commander
Planning & Real Property Branch Chief
U.S. Coast Guard

Enclosure: *Figure 1: Vicinity Map*
Figure 2: Proposed Project Layout



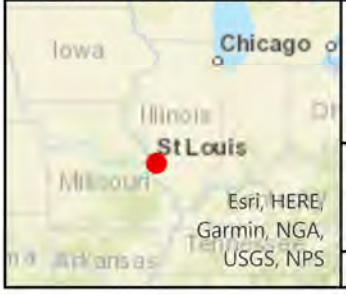


Figure 1: Vicinity Map
St. Louis, MO

Environmental Assessment
US Coast Guard Waterway Commerce Cutter
Homeport Facilities - St. Louis, Missouri

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere

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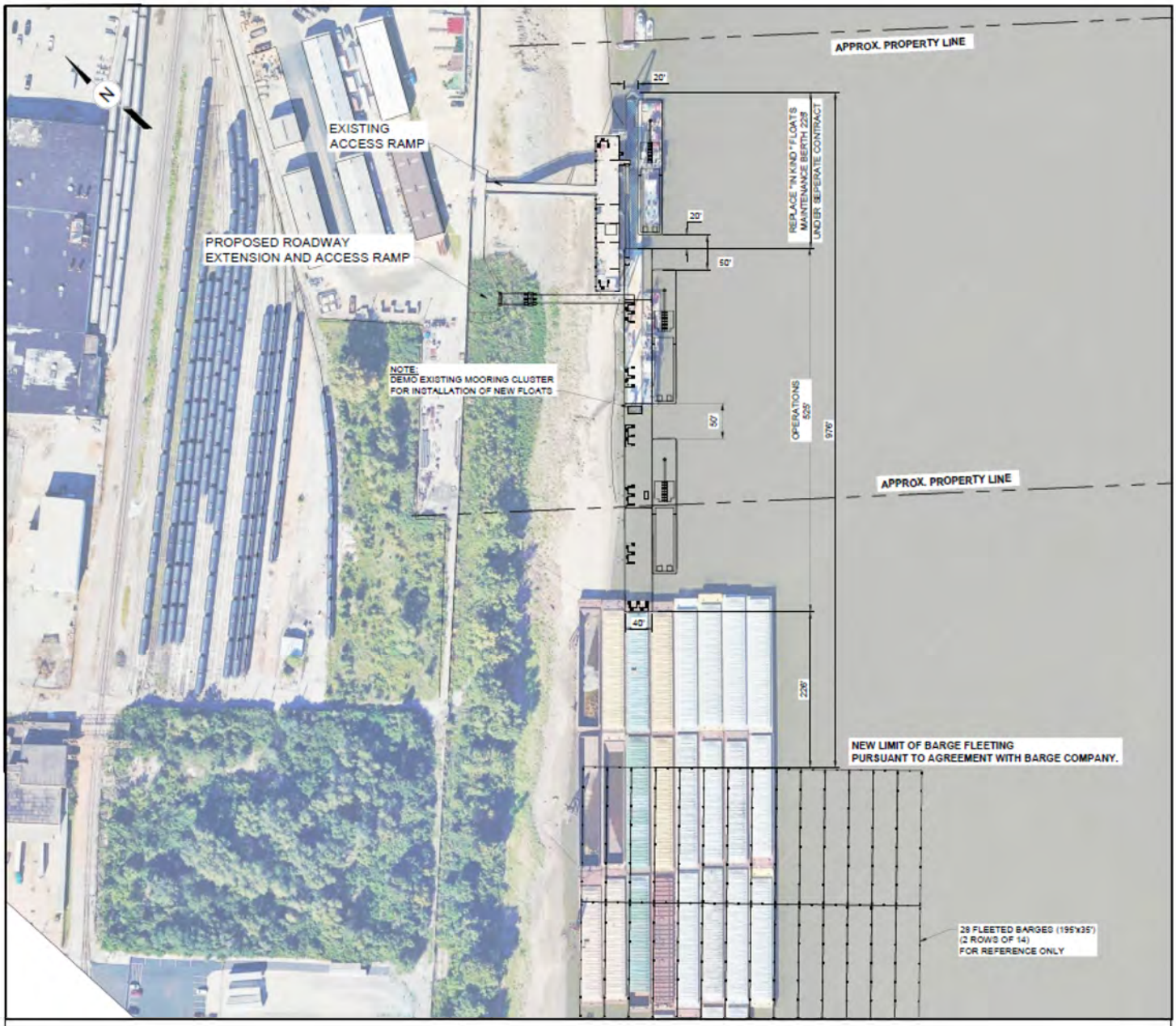

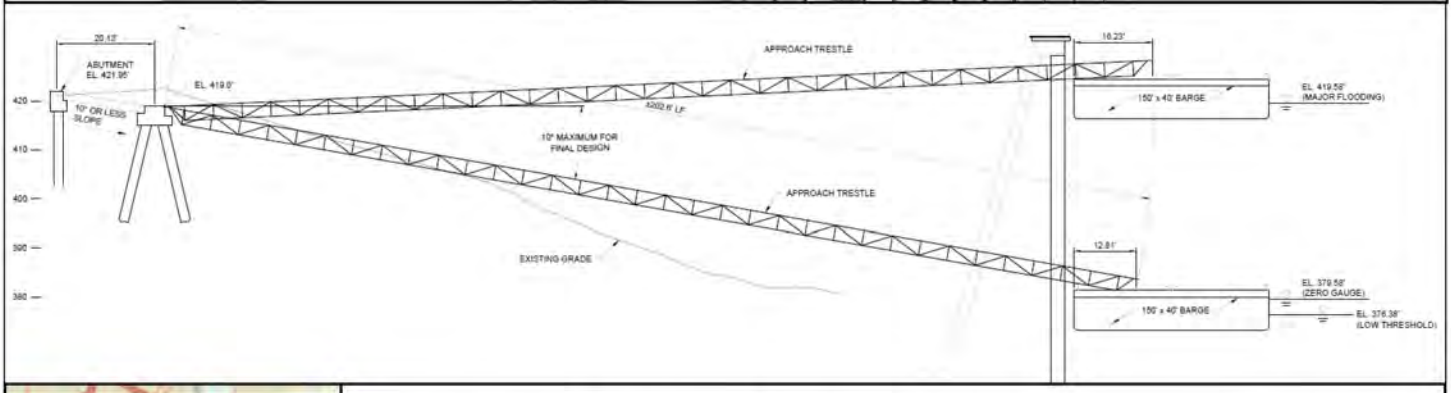

Figure 2: Proposed Project Layout
St. Louis, MO

Environmental Assessment
US Coast Guard Waterway Commerce Cutter
Homeport Facilities - St. Louis, Missouri

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere

LLOYD ENGINEERING, INC.

INFORMAL PROTECTED SPECIES CONSULTATION

Waterway Commerce Cutter Homeport Facilities
St. Louis, Missouri

United States Coast Guard
CEU Cleveland

Prepared for:
United States Coast Guard
Contact: Andrew Kaminski
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January 12, 2025

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INTRODUCTION

The United States Coast Guard (USCG) proposes to construct a dedicated Homeport facility to support operations for new purpose-built Waterway Commerce Cutters (WCCs) in St. Louis, MO. The location of the proposed project is the USCG Sector Upper Mississippi River located at 100 Arsenal Street, St. Louis, MO 63118. The site is home to an existing homeport with two legacy Cutters along the Mississippi River and the proposed project will create dedicated USCG facilities for maintenance and homeporting of the WCCs. The purpose of this memorandum is to facilitate informal consultation between the USCG and the U.S. Fish and Wildlife Service (USFWS) regarding the effects of the proposed action.

Impacts from the proposed action require an informal evaluation under the Endangered Species Act (ESA) of 1973, as amended, for project impacts that may affect, but are not likely to adversely affect listed species or their designated critical habitat. The USCG is requesting informal consultation with the USFWS regarding species that may be affected but are not likely to be adversely affected by the proposed action and follows the USFWS regulatory guidance for informal consultation (50 CFR 402.13).

This analysis of protected species determines that the proposed action may affect but is not likely to adversely affect the tricolored bat and pallid sturgeon due to the nature of the project activities, the habitat needs of the species, and the proposed conservation measures. Table 1 below provides a list of federally protected species and critical habitats considered in this assessment.

Table 1. Effect Determinations from the Proposed Action on Federally Protected Resources.

Common name	Scientific Name	ESA Designation[1,2]	Potential Habitat Presence in Action area? Y/N	Effect Determination[3]
Insects				
Monarch Butterfly	*Danaus plexippus*	C	N	NE
Mammals				
Tricolored Bat	*Perimyotis subflavus*	PE	**Y**	NLAA / Not Likely to Adversely Affect
Flowering Plants				
Decurrent False Aster	*Boltonia decurrens*	T	N	NE
Fish				
Pallid Sturgeon	Scaphirhynchus albus	E	**Y**	NLAA / Not Likely to Adversely Affect

[1] E – Endangered; T – Threatened; C – Candidate; PE – Proposed Endangered [2] NE – No Effect; NLAA – May Affect, Not Likely to Adversely Affect.
(Source: USFWS Information for Planning and Consultation (IPaC) resource list (USFWS 2025) and NOAA Fisheries).

PROJECT DESCRIPTION

Proposed Action

The proposed project location is within St. Louis, Missouri, along the Mississippi River. St. Louis has a unique position as a critical maritime hub and homeport to dedicated USCG facilities and a range of activities supporting national security and commerce. St. Louis is an existing homeport to two (2) legacy Cutters, CGC Cheyenne and CGC Gasconade, is a designated location for WCC maintenance and is proposed for the homeport of the newly delivered WCC's.

USCG Sector Upper Mississippi River Base Detachment at 100 Arsenal Street is owned by U.S. Army Corp of Engineers (USACE) and is located adjacent to USACE property and waterfront facilities located on the southwest side of the property. The site is currently leased by the USCG from the USACE. The existing marine facilities consist of a 225-ft x 35-ft fixed pier, a 15-ft wide access bridge connection to shore, and a 450-ft x 20-ft floating dock held in place with steel pipe guide piles. The facility is approximately 25 years old but is overall in good condition. The property to the southwest of the USCG berth is currently utilized as a barge fleeting area near the USCG floating docks. The site currently accommodates two legacy cutters, the CGC Cheyenne and CGC Gasconade, which will be replaced with the incoming WCC Cutters. In addition, the existing site has a maintenance facility (MAT) on the northeast slip of the site. Currently, when a vessel is in for maintenance at the MAT berth, the site is restricted to one operational berth requiring rafting and shifting of vessels for operations. Existing infrastructure at this site can be used for the proposed project with upgrades to existing utilities and cranes at the MAT facility.

The proposed project is to establish facilities in St. Louis that will provide two new homeport berths and one MAT berth, ensuring the Coast Guard can immediately support the operational requirements of the incoming WCCs while phasing out legacy cutters.

The USCG Proposed Action includes the following components to be constructed at the project location:

- Upgrades to electrical and utilities (water, sewer, and fiber);
- New crane and added crane foundation on the existing pier to support the existing maintenance facility;
- Install new 36-inch piles to support crane foundation;
- Add fixed trestle and articulating ramp to new floating docks;
- Extend existing roadway to south to the location of the new trestle; Replace in-kind floating dock at the maintenance facility (225 linear feet);
- Replace in-kind the personnel walkway (gangway) at the existing floating dock;
- Install 10 new mooring piles with 36-inch diameter plumb and 2 new 30-inch diameter batters at each mooring piles; and,
- Install new wider floating dock (40 feet wide by 515 linear feet).

A copy of the proposed project site plan is included in **Attachment A**.

Figure 1. 3D Project Area Map

THREATENED AND ENDANGERED SPECIES OCCURING IN ACTION AREA

INSECTS

Monarch Butterfly (*Danaus plexippus*): The monarch butterfly is a designated candidate species by the USFWS that has not yet been proposed for listing as either endangered or threatened. The preferred habitat for this species is found throughout North America where milkweed and other flowering plants and found. Monarchs funnel through Missouri both in the fall and the spring through the coastal migration flyway. In the fall they migrate through starting at the end of September through the beginning of November, and in the spring they cross through Texas again in February to April (Monarchwatch 2023).

While the monarch may be found migrating through the proposed project area, they would likely only be passing through as the project does not have suitable habitat for this species. **Therefore, the proposed project would have no effect on the monarch butterfly.**

MAMMALS

Tricolored Bat (*Perimyotis subflavus*): The tricolored bat is wide ranging across the eastern and central United States and portions of southern Canada, Mexico and Central America. During the winter, tricolored bats are often found in caves and abandoned mines, although in the southern United States, where caves are sparse, tricolored bats are often found roosting in road-associated culverts where they exhibit shorter torpor bouts and forage during warm

nights. The species prefers forested habitats during the spring, summer, and fall months where they primarily roost in the leaves of live trees or recently dead deciduous hardwood trees. During the winter, they occur within caves, abandoned mines, and culverts (USFWS 2024). Tricolored bats face extinction due primarily to the range wide impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. White-nose syndrome has caused estimated declines of more than 90 percent in affected tricolored bat colonies across the majority of the species' range.

Pile driving, tree clearing, and other noise-generating construction activities may result in the loss of potential summer roosting habitat in trees for tricolored bats. However, the project area is located outside of known winter hibernation sites and summer maternity roosting habitats for this species. **Therefore, the proposed project may affect but is not likely to adversely affect the tricolored bat.**

FLOWERING PLANTS

Decurrent False Aster (*Boltonia decurrens*): The decurrent false aster is a perennial plant found in moist, sandy floodplains and prairie wetlands along the Illinois River. Although not very tolerant to prolonged flooding, this plant relies on periodic flooding to scour away other plants that compete for the same habitat. This species is considered Critically Imperiled on the state of Missouri side of the Mississippi while on the state of Illinois, it is considered Imperiled (Nature Serve 2025). Habitat destruction and modification are believed to be the reasons for the decline. The species is dependent on periodic disturbance from major floods and seasonal fluctuations in water levels. However, the flood regime and seasonal water levels have been altered or stabilized by dams and levees and much former habitat has been modified into agricultural land. An increase in the amount of silt deposited on the floodplains (due to agricultural practices and extensive leveeing) has had a particularly detrimental effect and is threatened primarily by anthropogenic disturbance of natural habitat. This species blooms from August through October throughout its range and colonizes periodically in disturbed riverine moist soil habitats. The project area is located near and within the waters of Mississippi River. Terrestrial portions of the project area contain developed land for industrial and maritime use, riprap shorelines, and a small sliver of forested area. While the species has potential to occur within disturbed areas within the Mississippi River floodplain, open areas with regular disturbance from flood waters are not present within the project area. Additionally, BMPs are proposed to decrease potential impacts to the decurrent false aster. **Therefore, the proposed project would have no effect on the decurrent false aster.**

FISH

Pallid Sturgeon (*Scaphirhynchus albus*): The pallid sturgeon was first recognized as a species different from shovelnose sturgeon by S. A. Forbes and R. E. Richardson in 1905 based on a study of nine specimens collected from the Mississippi River near Grafton, Illinois (Forbes and

Richardson 1905). The new species was named *Parascaphirhynchus albus*. Later reclassification assigned it to the genus *Scaphirhynchus* (Bailey and Cross 1954; Campton et al. 2000). Pallid sturgeon have a flattened shovel-shaped snout; a long, slender, and completely armored caudal peduncle (the tapered portion of the body which terminates at the tail); and lack a spiracle (small openings found on each side of the head) (Forbes and Richardson 1905). As with other sturgeon, the mouth is toothless, protrusible (capable of being extended and withdrawn from its natural position), and ventrally positioned under the head. The skeletal structure is primarily composed of cartilage rather than bone.

The species historical range included Arkansas, Illinois, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, South Dakota, Tennessee, Wyoming. No critical habitat has been designated for this species.

The project area is located near and within the waters of Mississippi River. BMPs are proposed to decrease potential impacts to the pallid sturgeon. **Therefore, the proposed project may affect but is not likely to adversely affect the pallid sturgeon.**

Critical Habitats

There are no Critical Habitats within the proposed project area for the species listed in Table 1.

BEST MANAGEMENT PRACTICES AND CONSERVATION MEASURES

Because this project may affect, but is not likely to adversely affect, several protected species during construction, removal of structures, dredging, and placement of dredged material in designated areas, the applicant will implement the following BMPs and conservation measures. The use of acronyms is limited in this section to ensure it can be easily understood by a broader audience, including those not familiar with regulatory language.

- Implement *Protected Species Construction Conditions* (NMFS 2021a) by the National Marine Fisheries Service Southeast Regional Office.
- Ensure that all project personnel are trained in the potential presence of animal species protected by the Endangered Species Act and Marine Mammal Protection Act. On-site staff will be responsible for observing water-related activities for protected species and reporting sightings. Personnel will be advised that civil and criminal penalties apply for harming, harassing, or killing listed species and/or marine mammals. Information on protected species and critical habitat in the transit area is available through the National Marine Fisheries Service Find A Species tool, available online at https://www.fisheries.noaa.gov/findspecies, and in the consultation documents completed for this project.
- Manage fuel or chemical use to prevent leaks or spills from entering the aquatic environment.
- Develop and implement a spill prevention and response plan. Measures will include cleaning and sealing all in-water equipment to remove chemical residues and conducting daily inspections of construction equipment to ensure no leaks of fuel, antifreeze, hydraulic fluid, or other harmful substances. With these practices in place, the risk of spills or leaks is considered negligible.
- Maintain spill response readiness by staging booms and ensuring rapid reporting and cleanup procedures to minimize potential impacts to the surrounding environment.
- Project equipment and vehicles transiting between the dredging area and the beneficial use sites will be minimized to the extent practicable, including but not limited to using designated corridors and confining vehicle access to the immediate needs of the project.
- Use of construction lighting at night shall be minimized, directed toward the

construction activity area, and shielded from view outside of the project area to the maximum extent practicable. The project will avoid the use of bright white light, such as metal halide, halogen, fluorescent, mercury vapor and incandescent lamps.

- When a protected species (Pallid Sturgeon) is sighted, attempt to maintain a distance of 50 yards or greater between the animal and the vessel. Reduce speed and avoid any abrupt changes in direction until the animal(s) has/have left the area of its own volition.
- Schedule timing of in-channel disturbance (e.g., pile driving, cofferdam construction) to avoid sensitive aquatic life events (e.g., spawning).
- Modify the Proposed Action to avoid effects to suitable bat roosting and foraging habitat, such as caves, culverts, bridges, large-diameter tree species, etc.
- Retain standing dead trees for roosting habitat for bats. Limit vegetation removal to the amount practicable to minimize effects to riparian areas and avoid habitat loss.
- Clearly delineate and maintain project boundaries to avoid encroaching outside Project Area disturbance footprint.
- If vibratory extraction is used as a method for pile removal, follow a "ramp-up" procedure to protect aquatic wildlife. Sound should be initiated for 15 seconds at reduced energy followed by a 1-minute waiting period. Repeat this procedure two additional times.
    - Use "wake up" procedures to break the bond with the pile and sediment through vibrations, to avoid pulling out large blocks of soil.
    - Properly train the crane operator to remove piles slowly to minimize turbidity in the water column as well as sediment disturbance.
- Channel island tips should not be altered in any manner since pallid sturgeon appear to show a strong affinity for this habitat.
- Channel alterations that limit or eliminate shallow, sloping bank habitat should be avoided.
- Dams and other impoundment structures should be prohibited in major rivers to prevent further altering habitat for the pallid sturgeon and other aquatic species.
- Avoid in-stream work that disturbs the substrate or occurs in areas where juvenile and larval fish are found between April through mid-June.
- Maintain open, moist, early successional habitat that receives periodic inundation from Mississippi River floodwater. Established populations need

newly disturbed areas in which to spread.

- Occasional cultivation may benefit asters through soil disturbance. Asters are often located in wet lowland agricultural fields. These marginal areas should be avoided in wet years unless woody vegetation becomes established. Periodic disturbance will be needed to keep a site suitable for the aster.
- The wetland areas where decurrent false aster is found need to be protected in order to protect its habitat. Many aster populations are started when seeds float downstream and become established on riverbanks or in muddy backwater areas. Do not disturb these sites after flooding.
- Resurvey following significant flooding as decurrent false aster populations are frequently redistributed by flood waters.
- Use cutting, prescribed burns, or herbicides to reduce colonization of sites by cottonwoods, willows, and other wetland woody species.
- Low, wet areas of agricultural fields occupied by decurrent false aster should be cultivated only with adequate frequency to prevent succession to heavy shade-producing species, perhaps every third year.

SUMMARY

The proposed project is determined to have no effect on the following species:

1. Monarch Butterfly (*Danaus Plexippus*) – Proposed Candidate (C)
2. Decurrent False Aster (*Boltonia decurrens*) – Threatened (T)

However, the proposed project may affect but is not likely to adversely affect the following species:

3. Tricolored Bat (*Perimyotis subflavus*) – Proposed Endangered (PE)
4. Pallid Sturgeon (*Scaphirhynchus albus*) – Endangered (E)

The IPaC resource list and NOAA Fisheries' list of threatened is included in **Attachment B**.

REFERENCES

Monarchwatch. 2025. Monarch Migration. Accessed September 20, 2025, at https://monarchwatch.org/migration/.

National Oceanic and Atmospheric Administration (NOAA) Fisheries. 2025.

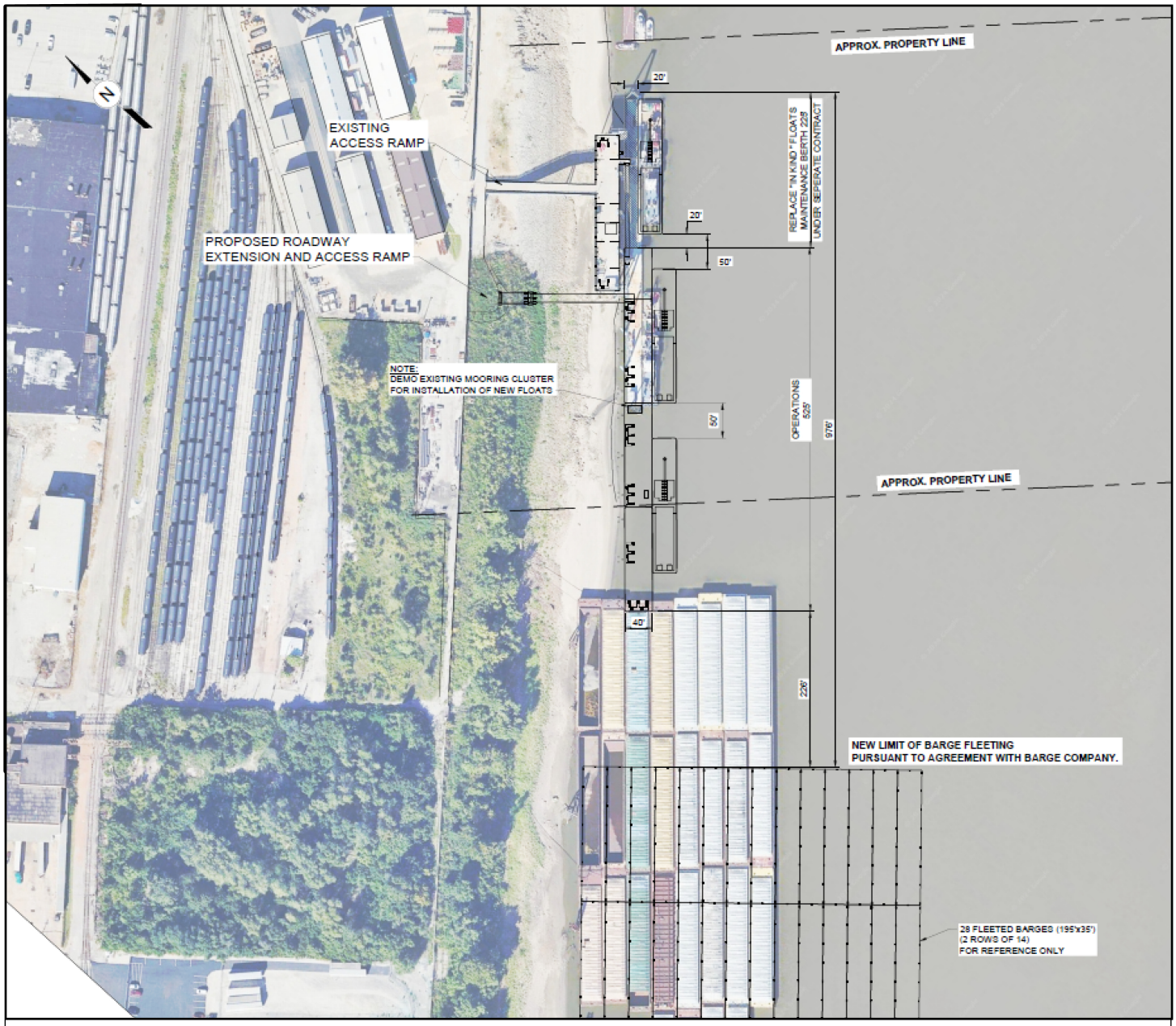
U.S. Fish and Wildlife Service (USFWS). 2025. IPaC – Information for Planning and Consultation. Accessed online September 12, 2025, at https://ecos.fws.gov/ipac/.

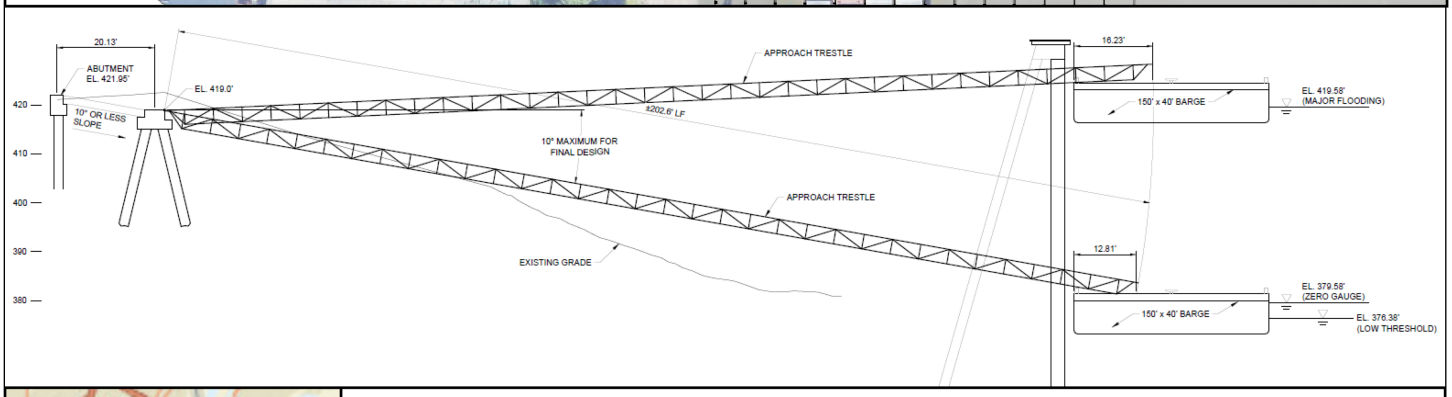
ATTACHMENT A
Proposed Project Site Plan

Figure 1: Vicinity Map
St. Louis, MO

Environmental Assessment
US Coast Guard Waterway Commerce Cutter
Homeport Facilities - St. Louis, Missouri

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere





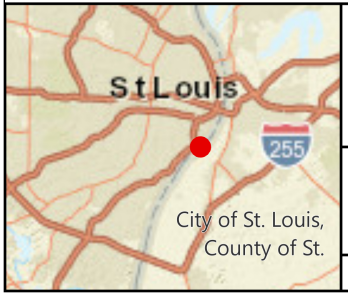


Figure 2: Proposed Project Layout
St. Louis, MO

Environmental Assessment
US Coast Guard Waterway Commerce Cutter
Homeport Facilities - St. Louis, Missouri

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere

LLOYD ENGINEERING, INC.

ATTACHMENT B
USFWS IPaC Resource List

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Missouri Ecological Services Field Office
101 Park Deville Drive
Suite A
Columbia, MO 65203-0057
Phone: (573) 234-2132 Fax: (573) 234-2181

In Reply Refer To: 09/12/2025 19:39:11 UTC
Project Code: 2025-0148960
Project Name: Waterway Commerce Homeport Facilities Project

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).
New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. **Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days.** The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Refer to the Midwest Region S7 Technical Assistance website for step-by-step instructions for making species determinations and for specific guidance on the following types of projects:

projects in developed areas, HUD, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

Federally Listed Bat Species

Indiana bats, gray bats, and northern long-eared bats occur throughout Missouri and the information below may help in determining if your project may affect these species.

Gray bats - Gray bats roost in caves or mines year-round and use water features and forested riparian corridors for foraging and travel. If your project will impact caves, mines, associated riparian areas, or will involve tree removal around these features – particularly within stream corridors, riparian areas, or associated upland woodlots –gray bats could be affected.
Indiana and northern long-eared bats - These species hibernate in caves or mines only during the winter. In Missouri the hibernation season is considered to be November 1 to March 31. During the active season in Missouri (April 1 to October 31) they roost in forest and woodland habitats. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥5 inches diameter at breast height (dbh) for Indiana bat, and ≥3 inches dbh for northern long-eared bat, that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Tree species often include, but are not limited to, shellbark or shagbark hickory, white oak, cottonwood, and maple. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, Indiana bats or northern long-eared bats could be affected.
Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas;
- Trees found in highly-developed urban areas (e.g., street trees, downtown areas);
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees; and
- A stand of eastern red cedar shrubby vegetation with no potential roost trees.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example "No Effect" document also can be found on the S7 Technical Assistance website.

2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see #3 below) – then project proponents can conclude the proposed activities **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain Life History Information for Listed and Candidate Species through the Species website.
3. If IPac returns a result that one or more federally listed bat species (Indiana bat, northern long-eared bat, or gray bat) are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** these bat species **IF** one or more of the following activities are proposed:
    a. Clearing or disturbing suitable roosting habitat, as defined above, at any time of year;
    b. Any activity in or near the entrance to a cave or mine;
    c. Mining, deep excavation, or underground work within 0.25 miles of a cave or mine;
    d. Construction of one or more wind turbines; or
    e. Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on listed bat species. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example "No Effect" document also can be found on the S7 Technical Assistance website.
If any of the above activities are proposed in areas where one or more bat species may be present, project proponents can conclude the proposed activities **may affect** one or more bat species. We recommend coordinating with the Service as early as possible during project planning. If your project will involve removal of over 5 acres of suitable forest or woodland habitat, we recommend you complete a Summer Habitat Assessment prior to contacting our office to expedite the consultation process. The Summer Habitat Assessment Form is available in Appendix A of the most recent version of the Range-wide Indiana Bat Summer Survey Guidelines.

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. Should bald or golden eagles occur within or near the project area please contact our office for further coordination. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA

to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of recommendations that minimize potential impacts to migratory birds. Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed voluntary guidelines for minimizing impacts.

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to guidelines developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's Wind Energy Guidelines. In addition, please refer to the Service's Eagle Conservation Plan Guidance, which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

Next Steps

Should you determine that project activities **may affect** any federally listed species or trust resources described herein, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

If you have not already done so, please contact the Missouri Department of Conservation (Policy Coordination, P. O. Box 180, Jefferson City, MO 65102) for information concerning Missouri Natural Communities and Species of Conservation Concern.
We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

John Weber

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Missouri Ecological Services Field Office
101 Park Deville Drive
Suite A
Columbia, MO 65203-0057
(573) 234-2132

PROJECT SUMMARY

Project Code: 2025-0148960
Project Name: Waterway Commerce Homeport Facilities Project
Project Type: Government / Municipal (Non-Military) Construction
Project Description: The purpose of the proposed USCG WCC Homeport Facilities Project (Project) is to ensure the current homeport and depot level maintenance facilities in St. Louis to meet the loading requirements of the new WCCs and required dock frontage to moor the WCCs safely under all conditions.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@38.58716295,-90.20892192762642,14z

Counties: St. Louis County, Missouri

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515 General project design guidelines: https://ipac.ecosphere.fws.gov/project/HFDA22RDS5D7XIQKCSOXDFAEKY/documents/generated/9456.pdf	Proposed Endangered

FISHES

NAME	STATUS
Pallid Sturgeon *Scaphirhynchus albus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7162 General project design guidelines: https://ipac.ecosphere.fws.gov/project/HFDA22RDS5D7XIQKCSOXDFAEKY/documents/generated/9456.pdf	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Decurrent False Aster *Boltonia decurrens* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7705 General project design guidelines: https://ipac.ecosphere.fws.gov/project/HFDA22RDS5D7XIQKCSOXDFAEKY/documents/generated/9456.pdf	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- R2UBH
- R2UBHx

IPAC USER CONTACT INFORMATION

Agency:	Private Entity
Name:	Sharmila Young
Address:	6565 West Loop S Fwy Svc Rd
Address Line 2:	Unit 708
City:	Bellaire
State:	TX
Zip:	77401
Email	syoung@lloydeng.com
Phone:	9366476313

Appendix B
Public Notice Comments and Response Matrix

Public Review Comments and Responses

US Coast Guard Waterway Commerce Cutter Homeport Facilities - St. Louis, Missouri - Draft Environmental Assessment

Affiliation	Date	Topic	Comment Summary	USCG Response	Substantive or Non-substantive
MO DNR	46066	NEPA	1. Karst Topography: There are 5 sinkholes near the project area. The project area is in the "Cahokia (IL)" quadrangle, which has a cave density of 19. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources. Karst areas have the potential to collapse.	The Project Area is in a previously developed parcel of artificial fill. Proper geotechnical survey has been conducted to inform engineering. Necessary precautions will be taken to avoid karst features and sinkholes by construction contractor(s). Shallow ground disturbing activities will be limited to utility trenching and shallow foundation excavation. Pile driving will occur in the Mississippi River and will adhere to geotechnical engineering.	non-substantive
			2. Wells: According to the Well Information Management System (WIMS) database, there are 192 wells near the project area. Wells can act as conduits of pollutants to groundwater resources. Any abandoned wells discovered must be plugged in accordance with section 256.615, RSMo. Appropriate best management practices should be used to protect any operating wells.	There are no known wells located on the project site. Appropriate best management practices will be used to protect any operating wells. Any discovered wells will be reported as required.	non-substantive
			3. Public Land: There are no public lands located near the project area.	Noted	non-substantive
			4. Conservation Opportunity Areas: To the best of the department's knowledge, there are no Conservation Opportunity Areas (COA's) near the project area.	Noted	non-substantive
			5. Water Protection- Best Management Practices: Best management practices should be used during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.	USCG will utilize BMPs to protect water resources during the project construction. BMPs are noted in the EA, Section 5 Special Conditions. Additional BMPs have been added in accordance to the suggested list in the letter received from MO DNR.	substantive

			6. Watershed Conditions Public Drinking Water: The project area is in or around the St. Louis City PWSS. To the best of the department's knowledge, there are no intakes, drinking water wells, or tanks near the project area	Noted	non-substantive
			7. Water Bodies with Specific Designated Uses: The proposed project area is within the Mississippi River. Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4).	As described in the EA Section 3.8 Water Resources, the proposed project is not anticipated to affect surface water body water quality in exceedance of any numeric water quality criteria. USACE CWA Section 401, 404 and 10 permit will be obtained prior to project construction. Standard construction BMPs such as silt fencing to reduce water quality impariment from sediment runoff will be implemented as feasible.	substantive
			8. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, project sponsors should take care to protect water quality.	The implementation of BMPs will reduce potential impacts associated with these activities, including deployment of debris booms and, if conditions are conducive, silt curtains around the proposed in-water work area.	substantive
			9. Waters with Approved Total Maximum Daily Loads: The Mississippi River has an EPA approved TMDL for Chlordane and PCB. Impairments should not be made worse by this project's activities.	The USCG's standard contract provisions for construction projects required BMPs to be used such as those listed in Section 5 to avoid and minimize potential adverse effects on surface water quality. Prior to project activities , sediments anticipated to be disturbed by project activities such as dredging would be sampled and tested for contaminants, including petroleum, PCBs, and polycyclic aromatic hydrocarbons (PAHs).	substantive
			10. Permitting Obligations Clean Water Act Sections 401 and 404: Projects that have the potential to discharge fill or dredged material into a jurisdictional water of the United States must receive a Clean Water Act Section 404 Permit Authorization from the U.S. Army Corps of Engineers (USACE), and a Section 401 Water Quality Certification from the department.	USACE CWA Section 401, 404 and 10 permit will be obtained prior to project construction.	substantive

			11. Land Disturbance The project must apply for a land disturbance permit from the department if it involves construction disturbance activities of one or more acres, or construction activities that disturb less than one acre when part of a larger common plan of development or sale that will disturb a cumulative total of one or more acres over the life of the project. Land disturbance activities include clearing, grubbing, excavating, grading, filling, and other activities that result in the destruction of the root zone. Disturbance to valuable resource waters, including springs, sinkholes and losing streams, could require additional conditions or permits.	The area of land disturbance is less than one acre. If the project requires, the appropriate MDNR Construction Land Disturbance Permit will be obtained prior to project construction. There are no anticipated impacts to valuable water resource in the project area. Standard construction BMPs such as silt fencing to reduce water quality impairment from sediment runoff will be implemented as feasible. USACE CWA Section 401, 404 and 10 permit will be obtained prior to project construction.	substantive
			12. Hazardous Waste: The department's interactive map allows users to access information about hazardous substance and petroleum storage tank site investigations and cleanups. Asbestos: Prior to demolition activities, regulated structures must be thoroughly inspected by a Missouri-certified asbestos inspector to determine if any Asbestos Containing Materials are present, and a notification made to the department at least ten working days prior to demolition. Solid Waste: No waste may be buried on-site or at an alternate site, except for clean fill.	There are no known hazardous waste, asbestos, or solid waste concerns within the project area or that will be impacted by the project. If unexpected petroleum storage tanks are located within the project area, proper reporting and disposal will be initiated.	substantive
			13. Air Pollution, Dust: Care should be taken to ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin.	BMPs listed in the EA Section 5 Special Procedures include practices for air quality and fugitive dust control.	substantive
			14. Open Burning: The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood.	Noted	non-substantive

Public Review Comments and Responses

US Coast Guard Waterway Commerce Cutter Homeport Facilities - St. Louis, Missouri - Draft Environmental Assessment

USFWS, MO Ecological Services Field Office	1/13/2026	Endangered Species	1. The Service has no objection to the proposed project; however, we recommend that instream activity not occur from March 1 to June 30th in order to avoid impacts during the primary time frame for fish spawning.	This time of work restriction is listed in the BMPs within the EA and has been additionally noted in the project plans.	substantive
			2. Information in the Biological Assessment indicates that the project area is located outside of known winter hibernation sites and summer maternity roosting habitats for the tri-colored bat and thus you have determined the proposed project is not likely to adversely affect the tricolored bat. Based on this information, we concur that the proposed project is not likely to adversely affect the tricolored bat. If the proposed project extends beyond the final listing for the tricolored bat, reinitiation of consultation may be necessary to confirm that this concurrence is still appropriate.	Noted	non-substantive
			3. . Based on the project location and the BMPs to decrease potential impacts to the Pallid Sturgeon, specifically the willingness to avoid in-water work during the spawning timeframe (i.e., March 1- June 30) we concur that the proposed project is not likely to adversely affect the pallid sturgeon. Should this project be modified, or new information indicate listed or proposed species may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.	Section 5.2 specifies that the project will avoid in water work from March 1 to June 30.	substantive

Public Review Comments and Responses

US Coast Guard Waterway Commerce Cutter Homeport Facilities - St. Louis, Missouri - Draft Environmental Assessment

Osage Nation Historic Preservation Office	2/12/2026	Section 106	The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. If/when Section 106 consultation is required for the proposed USDHS, USCG, ATON, Proposed Waterways Commerce Cutter Homeporting at St. Louis, Missouri, the Osage Nation requests that it be consulted and provided with the cultural resources survey report for the referenced project. The Osage Nation requires that cultural resource survey personnel and reports follow the Secretary of Interior's standards and guidelines. Please provide a detailed topographic map depicting the locations of the shovel tests and test units excavated during the survey along with a table indicating their depth, soils, the amount and type of material found, and reason for termination.	Added the following clarification of sediment disturbing activity in Section 3.4.2: "Ground disturbance expected outside the floodwall is limited to foundation excavation and grading for the proposed roadway extension and access ramp located immediately adjacent to the flood wall. In water disturbance will be limited to the removal of existing piles and the installation of approximately 4 new pile clusters to the south of the existing moorings. Ground disturbance on the USACE property inside the floodwall is expected to be limited to trenching approximately 2 feet deep and construction of concrete pads for the installation of new underground electrical and communication utilities. The proposed minor and shallow ground disturbance as part of the implementation of the Proposed Action has no effect on NRHP-listed or eligible archaeological resources that have been recorded near the project area. Therefore, impacts to cultural resources through implementation of the Proposed Action are not anticipated to occur. Concurrence with this statement has been received frrom MO SHPO in letter dated 3.27.2026. No cultural resources are anticipated within the project site and no surveys are proposed at this time as the project does not propose to disturb subsurface sediments by excavation or dredging and the project is in an area of previous artificial fill (Section 3.4.1). If any artifacts or human remains are unexpectedly found during project construction, the USCG will initiate proper notification to the SHPO and THPOs. A response letter was issued to Osage Nation on April 15, 2026.	substantive
Quapaw Nation Historic Preservation Program	1/27/2026	Section 106	The Quapaw Nation Historic Preservation Program (QHPP) has received and reviewed the information you have provided. Based upon the information you provided we believe that the Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements St. Louis County, Missouri will have no effect on known properties of cultural or sacred significance to the Quapaw Nation. We do not anticipate that this project will adversely impact any cultural resources protected under the NHPA. If, however, artifacts or human remains are discovered during project construction, we ask that work cease immediately and that you contact the Quapaw Nation Historic Preservation Office.	If any artifacts or human remains are found, the USCG will initiate proper notification to the SHPO and THPOs.	substantive

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

February 13, 2026

Ms. Cortney Gerken
1240 East Ninth Street, Room 2179
Cleveland, OH 44199-2060
courtney@lloydeng.com

Dear Ms. Gerken;

The Missouri Department of Natural Resources appreciates the opportunity to review the materials for the US Coast Guard Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements project.

The department offers the following comments related to environmental considerations for use in evaluating your project's environmental impacts pursuant to National Environmental Policy Act as amended (42 U.S.C. §§ 4321, et seq.).

Project Location
The project is located on a US Army Corps of Engineers (USACE) site at 100 Arsenal St., St. Louis, MO. The following geographic descriptions apply to the approximate location of the study area.

Geographic Coordinates:
743090 E, 4274675 N

Public Land Survey System:
Land Grant 00286
Land Grant 03122

8-Digit Hydrologic Unit Code:
Cahokia-Joachim (07140101)

Ecological Drainage Unit:
Ozark/Apple/Joachim

Geology and Geospatial Data
If a full Geologic Assessment is required for a project, the Missouri Geological Survey can be contacted directly at 800-361-4827. Other maps showing natural and cultural resources can be found at https://dnr.mo.gov/land-geology/maps-data-research.

Karst Topography
There are 5 sinkholes near the project area. The project area is in the "Cahokia (IL)" quadrangle, which has a cave density of 19. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources. Karst areas have the potential to collapse.

Wells
The Water Well Drillers' Act (Missouri Revisor of Statutes Sections 256.600 to 256.640) requires well installation and pump installation contractors to submit certification reports for all new wells drilled after July 31, 1987. As a result, the below information would not include well data prior to July 31, 1987.

According to the Well Information Management System (WIMS) database, there are 192 wells near the project area. Wells can act as conduits of pollutants to groundwater resources. Any abandoned wells discovered must be plugged in accordance with section 256.615, RSMo. Appropriate best management practices should be used to protect any operating wells. For more information on locating and plugging wells, or on private domestic wells, please visit the link below for the department's Well Installation Section webpage or contact the department's Geological Survey Program directly. https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/wells-drilling.

Public Land
There are no public lands located near the project area.

Conservation Opportunity Areas
To the best of the department's knowledge, there are no Conservation Opportunity Areas (COA's) near the project area. Both terrestrial and aquatic COAs are identified by the Missouri Department of Conservation (MDC) and its conservation partners as priority areas that support and conserve viable populations of wildlife and the ecological systems on which they depend. Designated COAs are located statewide and may consist of a combination of public and private resources. Please contact the MDC at
573-751-4115 for more information.

Water Protection
Best Management Practices
Best management practices should be used during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.

Watershed Conditions

Public Drinking Water

The project area is in or around the St. Louis City PWSS. To the best of the department's knowledge, there are no intakes, drinking water wells, or tanks near the project area. Proposed project personnel should be aware of nearby Public Drinking Water systems. Work associated with any project should take into consideration the protection of surface and groundwater public drinking water supplies, implementing appropriate best management practices as necessary. For additional information regarding source water protection, please contact the department's Public Drinking Water Branch at 573-526-0269.

Designated Uses

Water Bodies with Specific Designated Uses

The proposed project area is within the Mississippi River. Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4). Designated uses of x River/Stream include the following:

- Protection and propagation of fish, shellfish, and wildlife – warm water habitat (WWH)
- Human health protection (HHP)
- Irrigation (IRR)
- Livestock and wildlife protection (LWP)
- Secondary contact recreation (SCR)
- Drinking water supply (DWS)
- Industrial water supply (IND)

Water Bodies without Specific Designated Uses

Water bodies that are not assigned specific designated uses are still protected by general water quality criteria outlined at 10 CSR 20-7.031(4) and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions.

According to the National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, there is the likelihood of freshwater wetlands and ponds within the riparian corridors of the Mississippi River. This project has the potential to impact wetlands, ponds, and the aforementioned tributaries and headwater streams to be impacted, depending on their proximity to land disturbance activities. Project sponsors should avoid such impacts through alternatives analysis before compensatory mitigation is considered. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, project sponsors should take care to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

Sensitive Waters

To the best of the department's knowledge, there are no known sensitive waters in the project area for the following categories: Cold Water Habitat, Outstanding National Resource Waters,

Outstanding State Resource Waters, Metropolitan No-Discharge streams, biocriteria reference locations, losing streams, and 303(d) Impaired and 305(b) Threatened Waters.

Waters with Approved Total Maximum Daily Loads
The Mississippi River has an EPA approved TMDL for Chlordane and PCB.

Impairments should not be made worse by this project's activities. The department staff may require extra protections when developing permits or certifications to comply with total maximum daily load and wasteload allocations. Additional information can be found by contacting the department's Water Protection Program at 573-526-1446 or by visiting the link below.
https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/tmdls

Permitting Obligations
Clean Water Act Sections 401 and 404
Projects that have the potential to discharge fill or dredged material into a jurisdictional water of the United States must receive a Clean Water Act Section 404 Permit Authorization from the U.S. Army Corps of Engineers (USACE), and a Section 401 Water Quality Certification from the department. Some examples of activities that typically require a 404 permit and a 401 certification include stream bank stabilization, installation or replacement of culverts and low water crossings, fill impacts related to residential and commercial developments, and infrastructure maintenance. To learn more about the 404 permits visit the USACE's website: https://rrs.usace.army.mil/rrs/home/permitting. For more information about 401 water certification from the department, go to https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/section-401-water-quality

If discharge into water has occurred, or will occur, project personnel should immediately contact the appropriate USACE District (link below) and the department's Operating Permits Section at 573-522-4502 for more information.
http://www.mvr.usace.army.mil/Portals/48/docs/regulatory/MORegBound.pdf

Land Disturbance
The project must apply for a land disturbance permit from the department if it involves construction disturbance activities of one or more acres, or construction activities that disturb less than one acre when part of a larger common plan of development or sale that will disturb a cumulative total of one or more acres over the life of the project. Land disturbance activities include clearing, grubbing, excavating, grading, filling, and other activities that result in the destruction of the root zone. Disturbance to valuable resource waters, including springs, sinkholes and losing streams, could require additional conditions or permits.

Information and application for online land disturbance permits are located at https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/stormwater/construction-land-disturbance.

Questions regarding permit requirements may be directed to the appropriate Regional Office. https://dnr.mo.gov/about-us/division-environmental-quality/regional-office

Demolition and Construction Waste Management

Information on managing construction and demolition waste can be found at https://dnr.mo.gov/print/document-search/pub2045.

Hazardous Waste

The department's interactive map allows users to access information about hazardous substance and petroleum storage tank site investigations and cleanups. Please review site investigations and cleanups in the project area by accessing the interactive map at the following link: https://dnr.mo.gov/waste-recycling/long-term-stewardship-lts/environmental-site-tracking-research-tool-e-start. Should the project area intersect with one or more hazardous substance or petroleum storage tank sites, please contact erp@dnr.mo.gov for additional guidance prior to initiating excavation.

During the project, if any underground tanks or contaminated soil is discovered, workers should withdraw to a safe distance and notify the department's spill line at 573-634-2436.

It is the generator's responsibility to determine if materials generated during construction and demolition, are hazardous wastes. Demolition-related waste categories typically include paint residue (paint chips, paint scrapings, etc.), demolition debris (metal and boards that have been painted with lead-based or other heavy metal-based paint), and scrap metal (metal objects that contain lead or other heavy metals). A hazardous waste determination is not required for materials that will be reused or recycled without additional processing.

Asbestos

Prior to demolition activities, regulated structures must be thoroughly inspected by a Missouri-certified asbestos inspector to determine if any Asbestos Containing Materials are present, and a notification made to the department at least ten working days prior to demolition. Regulated structures include any building which has been used as a commercial, institutional, or industrial building (even if it was historic use), and projects involving two or more residential structures. In addition, this includes but is not limited to the following "non-building" structures: bridges, pipelines, cooling towers, chimneys, dams, and tunnels. Any asbestos found must be properly managed to prevent release of asbestos fibers.

Solid Waste

Information about solid waste uncovered during construction activities can be found at https://dnr.mo.gov/document-search/managing-solid-waste-encountered-during-excavation-activities-pub2192/pub2192.

No waste may be buried on-site or at an alternate site, except for clean fill. Clean fill is defined by the Revised Statutes of Missouri as "uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, and inert solids as approved by rule or policy of the department for fill, reclamation or other beneficial use." Clean fill must not contain protruding metals or demolition debris. Although not regulated as waste,

placement of clean fill materials may be subject to requirements of the department's Water Protection Program if it is placed in contact with surface or subsurface waters of the state or would otherwise violate water quality standards.

Air Pollution

Dust

Care should be taken to ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin. Additional information on general dust emissions may be found at https://dnr.mo.gov/print/document-search/pub2200.

Open Burning

The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood. Brush from land clearing activities may be burned if the burning is conducted outside the city limits and greater than 200 yards from the nearest occupied structure. Additional information on open burning can be found at https://dnr.mo.gov/print/document-search/pub2047.

The above comments concern potential environmental impacts related to air, land, and water. Feedback on this project related to the other topics should be directed as described below:

- Historic Preservation: Project personnel should check with the department's State Historic Preservation Office to determine if a Section 106 Review is needed. Information on the Section 106 Review can be found on the department's web site at https://www.mostateparks.com/page/84261/section-106-review or by contacting the State Historic Preservation Office at 573-751-7858.
- Floodplain: For information concerning flood plains impacts, contact the Missouri State Emergency Management Agency, Floodplain Management and Mitigation Branch, at 573-526-9100 or 2302 Militia Drive, Jefferson City, MO 65101.
- Endangered Species: The MDC is responsible for collecting and managing information on the location and status of endangered species in the state. Contact MDC's Endangered Species Coordinator at 573-751-4115 or P.O. Box 180, Jefferson City, MO 65102 for information about endangered species impacts.

We appreciate the opportunity to provide comments for the proposed project. If you have any questions or need clarification, please contact me at 573-522-8277.

Sincerely,

Ségolène Renazé
Policy Advisor

SR/rab

From:	Pherigo, Emily K
To:	Courtney Gerken
Subject:	Re: [EXTERNAL] Concurrence Request - US Coast Guard Waterway Commerce Cutter Homeport Facilities St Louis, MO
Date:	Tuesday, January 13, 2026 12:52:48 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png Outlook-512hpvyt.png

Hi Courtney,
Thank you for your email requesting review of the proposed Homeport facility to support US Coast Guard operations out of St. Louis, Missouri. These comments are provided under the authority of and in accordance with the provisions of the Endangered Species Act of 1973, as amended; the Fish and Wildlife Coordination Act; and the National Environmental Policy Act.

Fish and Wildlife Resources

The Service has no objection to the proposed project; however, we recommend that in-stream activity not occur from March 1 to June 30th in order to avoid impacts during the primary time frame for fish spawning.

Threatened and Endangered Species

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service (Service) information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. In the email you provided a list of species which may be present within the project area (Project Code: 2025-0148960).

Information in the Biological Assessment indicates that the project area is located outside of known winter hibernation sites and summer maternity roosting habitats for the tri-colored bat and thus you have determined the proposed project is not likely to adversely affect the tricolored bat. Based on this information, we concur that the proposed project is not likely to adversely affect the tricolored bat. If the proposed project extends beyond the final listing for the tricolored bat, reinitiation of consultation may be necessary to confirm that this concurrence is still appropriate. Based on the project location and the BMPs to decrease potential impacts to the Pallid Sturgeon, specifically the willingness to avoid in-water work during the spawning timeframe (i.e., March 1- June 30) we concur that the proposed project is not likely to adversely affect the pallid sturgeon. Should this project be modified, or new information indicate listed or proposed species may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.

Thank you for the opportunity to provide information concerning threatened and endangered species. Please let me know if you have any questions.

Have a good day,

Emily Pherigo
Deputy Field Supervisor
Missouri Ecological Services Field Office
US Fish and Wildlife Service

office: 573-306-5864
cell: 573-864-5185

e-mail: emily_pherigo@fws.gov

From: Weber, John S <John_S_Weber@fws.gov>
Sent: Tuesday, January 13, 2026 9:06 AM
To: Courtney Gerken <courtney@lloydeng.com>
Cc: Pherigo, Emily K <emily_pherigo@fws.gov>
Subject: Re: [EXTERNAL] Concurrence Request - US Coast Guard Waterway Commerce Cutter Homeport Facilities St Louis, MO

Hi Courtney,

Thank you for sending this in. We will review it and turn it around ASAP.

Best regards,

John Weber
Field Supervisor
U.S. Fish & Wildlife Service
Missouri Ecological Services Field Office
Cell: 573-825-6048

From: Courtney Gerken <courtney@lloydeng.com>
Sent: Monday, January 12, 2026 3:39 PM
To: Missouri ESFO, FW3 <Missouri_ESFO@fws.gov>; Weber, John S <John_S_Weber@fws.gov>
Subject: [EXTERNAL] Concurrence Request - US Coast Guard Waterway Commerce Cutter Homeport

Facilities St Louis, MO

Mr. Weber,
As a follow-up to the previously sent request for comment on the posted Draft EA for the US Coast Guard WCC Base St. Louis project, please see the attached Protected Species Analysis and request for concurrence to our assessment of project effects.

Please let me know if you have any questions or additional data or documentation needs to facility this request,
Thank you,

Courtney Gerken | Environmental Project Manager

LLOYD ENGINEERING, INC.
LinkedIn

6565 West Loop South, Ste. 708
Bellaire, Texas 77401
832.426.4656
x1029 | 713.413.7342
courtney@lloydeng.com

Osage Nation Historic Preservation Office

WA[A[E KOSY KY]EA

Date: February 12, 2026

USCG
Courtney Gerken
6565 West Loop South, Ste. 708
Bellaire, Texas 77401

RE: USDHS, USCG, ATON, Proposed Waterways Commerce Cutter Homeporting at St. Louis, Missouri (ONHPO#2526-1113MO-1)

SENT VIA EMAIL

Dear Ms. Gerken,

The Osage Nation Historic Preservation Office has received the NEPA scoping document for the proposed USDHS, USCG, ATON, Proposed Waterways Commerce Cutter Homeporting at St. Louis, Missouri.

In accordance with the National Historic Preservation Act, (NHPA) [54 U.S.C. Â§ 300101 et seq.] 1966, undertakings subject to the review process are referred to in 54 U.S.C. Â§ 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. **If/when Section 106 consultation is required for the proposed USDHS, USCG, ATON, Proposed Waterways Commerce Cutter Homeporting at St. Louis, Missouri, the Osage Nation requests that it be consulted and provided with the cultural resources survey report for the referenced project.** The Osage Nation requires that cultural resource survey personnel and reports follow the Secretary of Interior's standards and guidelines. **Please provide a detailed topographic map depicting the locations of the shovel tests and test units excavated during the survey along with a table indicating their depth, soils, the amount and type of material found, and reason for termination.**

Should you have any questions or need any additional information please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

627 Grandview Ave. * Pawhuska, OK 74056 Telephone 918-287-5328 * Fax 918-287-5376
www.osagenation-nsn.gov/who-we-are/historic-preservation * HistoricPreservation@osagenation-nsn.gov

Andrea A. Hunter, Ph.D.
Director, Tribal Historic Preservation Officer

Michaela Conway, MA, RPA
Archaeologist

627 Grandview Ave. * Pawhuska, OK 74056 Telephone 918-287-5328 * Fax 918-287-5376
www.osagenation-nsn.gov/who-we-are/historic-preservation * HistoricPreservation@osagenation-nsn.gov

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

Commanding Officer
United States Coast Guard
Civil Engineering Unit Cleveland

1240 E. Ninth St., Room 2179
Cleveland, OH 44141

11000/26-026
April 15, 2026

Osage Nation
c/o Andrea A. Hunter, Ph.D. Director, Tribal Historic Preservation Officer
& Michaela Conway, MA, RPA Archaeologist
627 Grandview Ave
Pawhuska, OK 74056

SUBJECT: ONHPO#2526-1113MO-1
US Coast Guard Waterway Commerce Homeport Facilities Project, Saint Louis, MO: Response to Comments, Environmental Assessment

Ms. Hunter,

This letter has been prepared in response to the comment letter received from Osage Nation dated February 12, 2026 regarding the U.S. Coast Guard (USCG) Draft Environmental Assessment (EA) evaluating potential impacts associated with the construction and operation activities proposed for the Waterway Commerce Homeport Facilities located at 100 Arsenal Street, St. Louis, MO 63118. The EA is an evaluation of the potential environmental impacts of the dredging operations to establish facilities in St. Louis that will provide two homeport berths and one maintenance berth, ensuring the Coast Guard can immediately support the operational requirements of the incoming WCCs while phasing out legacy cutters.

Osage Nation was notified of the availability of the Draft EA for review and comment and requested comment pursuant to Section 106 of NHPA. The comment letter received stated:

"The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. **If/when Section 106 consultation is required for the proposed USDHS, USCG, ATON, Proposed Waterways Commerce Cutter Homeporting at St. Louis, Missouri, the Osage Nation requests that it be consulted and provided with the cultural resources survey report for the referenced project.** The Osage Nation requires that cultural resource survey personnel and reports follow the Secretary of Interior's standards and guidelines. **Please provide a detailed topographic map depicting the locations of the shovel tests and test units excavated during the survey along with a table indicating their depth, soils, the amount and type of material found, and reason for termination."**

The Final EA has been amended to add clarification regarding the significance of ground disturbance and likelihood of encountering cultural resources during the construction of the project. Ground disturbance expected outside the floodwall is limited to foundation excavation and grading for the proposed roadway extension and access ramp located immediately adjacent

to the flood wall. In-water disturbance will be limited to the removal of existing piles and the installation of approximately 4 new pile clusters to the south of the existing moorings. Ground disturbance on the USACE property inside the floodwall is expected to be limited to trenching approximately 2 feet deep and construction of concrete pads for the installation of new underground electrical and communication utilities. The proposed minor and shallow ground disturbance as part of the implementation of the Proposed Action has no effect on NRHP-listed or eligible archaeological resources that have been recorded near the project area. Therefore, impacts to cultural resources through implementation of the Proposed Action are not anticipated to occur.

Concurrence with this statement has been received from MO SHPO in letter dated March 27, 2026. No cultural resources are anticipated within the project site and no surveys are proposed at this time as the project does not propose to disturb subsurface sediments by excavation or dredging and the project is in an area of previous artificial fill (Refer to Section 3.4.1 of the Final EA posted at this location: Environmental Planning and Historic Preservation.). If any cultural artifacts or human remains are unexpectedly found during project construction, the USCG will initiate proper notification to the SHPO and THPOs.

Should you need additional information or have any questions, please contact Courtney Gerken with Lloyd Engineering, Inc. at Courtney@lloydeng.com.

Sincerely,

LCDR Justin Davis
Planning and Real Property Branch Chief
United States Coast Guard
Civil Engineering Unit Cleveland

Enclosure: MO SHPO Concurrence Letter dtd March 27, 2026

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

March 27, 2026

Courtney Gerken
Lloyd Engineering, Inc
6565 West Loop South
Bellaire, TX 77401

Re: **SHPO Project Number: 018-SLC-26** — Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements - USCG Base St. Louis, 100 Arsenal St Bldg 17, St. Louis, St. Louis County, Missouri

Dear Courtney Gerken:

Thank you for submitting information to the State Historic Preservation Office (SHPO) regarding the above-referenced project for review pursuant to Section 106 of the National Historic Preservation Act, P.L. 89-665, as amended (NHPA), and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of historic properties.

We have reviewed the information regarding the above-referenced project and have included our comments on the following page(s). Please retain this documentation as evidence of consultation with the Missouri SHPO under Section 106 of the NHPA. SHPO concurrence does not complete the Section 106 process as federal agencies will need to conduct consultation with all interested parties. **Please be advised that, if the current project area or scope of work changes, such as a borrow area being added, or cultural materials are encountered during construction, appropriate information must be provided to this office for further review and comment.**

If you have questions, please contact the SHPO at (573)751-7858 or call/email Amy Rubingh, (573) 751-4589, amy.rubingh@dnr.mo.gov. If additional information is required, please submit the information via email to MOSection106@dnr.mo.gov.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Dawn Scott, Director
Deputy State Historic Preservation Officer

CC: Andrew Kaminski, USCG

SHPO Project Number: 018-SLC-26 — Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements - USCG Base St. Louis, 100 Arsenal St Bldg 17, St. Louis, St. Louis County, Missouri

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COMMENTS:

Adequate documentation has been provided as outlined in 36 CFR Section 800.11. After review of the initial submission, the project area has no known historic properties present and a low potential for the occurrence of cultural resources. SHPO concurs with your determination of **no historic properties affected**.

SHPO Reviewer: Amy Rubingh, (573) 751-4589, amy.rubingh@dnr.mo.gov

From:	Julia Pebeahsy
To:	Courtney Gerken
Cc:	section 106
Subject:	Re: Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements St. Louis County, Missouri
Date:	Tuesday, January 27, 2026 2:38:52 PM

Dear Courtney Gerken,

The Quapaw Nation Historic Preservation Program (QHPP) has received and reviewed the information you have provided. Based upon the information you provided we believe that the Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements St. Louis County, Missouri will have no effect on known properties of cultural or sacred significance to the Quapaw Nation.

In accordance with the National Historic Preservation Act, (NHPA) [16 U.S C. 470 §§ 470-470w-6] 1966, undertakings subject to the review process are referred to in S101 (d) (6) (A), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

We do not anticipate that this project will adversely impact any cultural resources protected under the NHPA. If, however, artifacts or human remains are discovered during project construction, we ask that work cease immediately and that you contact the Quapaw Nation Historic Preservation Office.

Should you have any questions or need any additional information regarding this project, please feel free to Julia Pebeahsy at Julia.pebeahsy@quapawnation.com, please copy section.106@quapawnation.com to ensure additional information requests are reviewed in a timely manner. Thank you for consulting with the Quapaw Nation on this matter.

Sincerely,

Julia Pebeahsy

On behalf of
-Ms. Billie Burtrum
Preservation Officer/ QNHPP Director

Quapaw Nation
P.O. Box 765
Quapaw, OK 74363
(w) 918-238-3100
(f) 918-674-24560

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

March 27, 2026

Courtney Gerken
Lloyd Engineering, Inc
6565 West Loop South
Bellaire, TX 77401

Re: **SHPO Project Number: 018-SLC-26** — Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements - USCG Base St. Louis, 100 Arsenal St Bldg 17, St. Louis, St. Louis County, Missouri

Dear Courtney Gerken:

Thank you for submitting information to the State Historic Preservation Office (SHPO) regarding the above-referenced project for review pursuant to Section 106 of the National Historic Preservation Act, P.L. 89-665, as amended (NHPA), and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of historic properties.

We have reviewed the information regarding the above-referenced project and have included our comments on the following page(s). Please retain this documentation as evidence of consultation with the Missouri SHPO under Section 106 of the NHPA. SHPO concurrence does not complete the Section 106 process as federal agencies will need to conduct consultation with all interested parties. **Please be advised that, if the current project area or scope of work changes, such as a borrow area being added, or cultural materials are encountered during construction, appropriate information must be provided to this office for further review and comment.**

If you have questions, please contact the SHPO at (573)751-7858 or call/email Amy Rubingh, (573) 751-4589, amy.rubingh@dnr.mo.gov. If additional information is required, please submit the information via email to MOSection106@dnr.mo.gov.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Dawn Scott, Director
Deputy State Historic Preservation Officer

CC: Andrew Kaminski, USCG

SHPO Project Number: 018-SLC-26 — Waterways Commerce Cutter Homeport and Maintenance Facility Waterfront Improvements - USCG Base St. Louis, 100 Arsenal St Bldg 17, St. Louis, St. Louis County, Missouri

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COMMENTS:

Adequate documentation has been provided as outlined in 36 CFR Section 800.11. After review of the initial submission, the project area has no known historic properties present and a low potential for the occurrence of cultural resources. SHPO concurs with your determination of **no historic properties affected**.

SHPO Reviewer: Amy Rubingh, (573) 751-4589, amy.rubingh@dnr.mo.gov