

## Appendix D Response to Public Comments

This page intentionally left blank.

## **D.1 OVERVIEW OF COMMENTS AND RESPONSES**

### **D.1.1 Timing and Methods of Comment Submittal**

The 45-day public comment period provided an opportunity for government agencies, interest groups, and the general public to comment on the Draft Supplemental Environmental Impact Statement (SEIS). The Navy advertised two primary methods for submitting comments: (1) written comments mailed to the SEIS project office, and (2) written comments provided via the comment page on the SEIS public website. The public comment period began on August 18, 2017 and closed on October 2, 2017 (82 FR 39424).

This Appendix contains all comments received during the public comment period. All received comments were assessed and considered both individually and collectively during development of this Final SEIS. Written responses were prepared for all comments and are also included in this Appendix.

### **D.1.2 Comment Response Process**

The Navy implemented the following process for reviewing and responding to all comments received during the public comment period for the Draft SEIS:

- The Navy carefully reviewed all website comments and comment letters received and assigned a unique alphanumeric identification (ID) number to each. Comments received via the website were given an ID number beginning with W (e.g., W-001) and comments received by mail were identified with an M in front of the number. The same ID number was also assigned to the commenter. On comment letters for which distinct or separable points could be identified and addressed, a red vertical line was applied in the margin to subdivide the letter into numbered “sub-comments” and the sub-comments are identified by letters of the alphabet.
- Appropriate resource specialists and Navy authorities considered all comments (and sub-comments) and prepared and approved appropriate written responses.
- As appropriate based on substantive comments about the SEIS analysis and findings, the Navy modified the Final SEIS to make corrections and improve or clarify the analysis from the Draft SEIS.

### **D.1.3 Summary of Comments Received During the Draft SEIS Public Comment Period**

Three comments were submitted via the SEIS website and two comment letters were received via the mail. Comment letter M-001 was subdivided into three sub-comments and comment letter M-002 was divided into 14 sub-comments, for a total of 20 distinct comments received and addressed with specific responses.

## **D.2 RESPONSES TO PUBLIC COMMENTS ON THE DRAFT SEIS**

Comments received on the Draft SEIS and associated Navy responses to the comments are provided on the following pages.

Comment ID: W-001

Received: August 19, 2017    Navy Response to Comment W-001:

**Name:** Jason Saul

**Location:** Bremerton, WA

**Comment:** Thank you for being so detailed and careful in your efforts to mitigate impacts to the natural landscape and to the wild creatures that depend on it.

Comment noted. Thank you.

Comment ID: W-002

Received: November 6, 2017 Navy Response to Comment W-002:

**Name:** Richard Stoll

**Location:** Poulsbo, WA 98370

**Comment:** Failed to adequately address sea run cutthroat trout that inhabit the very shallow near shore areas in and around Bangor and in the immediate project area. The project will have a significant impact on these fish as they feed in and migrate directly through the shallow water areas of the project. This fish has been a WDFW species of concern for some years but because it is of relatively small economic importance because it is a non-commercial species there has been very little range-wide research. However, there have been studies of migration patterns for these fish coming out of Big Beef Creek, just south of Bangor and for those migrating out of the Duckabush and Hamma Hamma river systems. Suggest contacting James Losee, WDFW biologist who is currently doing research on these fish. Further, suggest referring to the book "Sea Run Cutthroat Trout" by Richard Stoll in which several chapters are dedicated to the biology, ecology, and conservation of these fish. Further, this book has an extensive bibliography which covers much of sources of scientific information that exist on sea run cutthroat trout.

Thank you for your comment. Cutthroat trout were addressed in the Final EIS and were determined to not be in the vicinity of the project site; see Section 1.3.4 of Appendix B, *Marine Fish Life History, Habitat Conditions, and Hearing* of the July 2016 Final EIS. Additionally, the SPE action does not occur in the shallow nearshore area.

Comment ID: W-1

Received: November 15, 2017    Navy Response to Comment W-003:

**Name:** Byron Faber

**Location:** Kingston, WA 98346

**Comment:** We strongly agree with the Navy's plans and urge approval. The Navy is a careful steward of our environment & natural resources. Please let them defend our country without obstructionist regulations. Byron & Pat Faber  
Kingston, Wa 98346

Comment noted. Thank you.

Comment ID: M-001

Received: October 2, 2017 Navy Response to Comment M-001:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL REVIEW  
AND ASSESSMENT

October 2, 2017

NAVFAC Northwest  
Attention: Ms. Kimberly Kler, LWI/SPE EIS Project Manager  
1101 Tautog Circle, Suite 203  
Silverdale, WA 98315-1101

Dear Ms. Kler:

We have reviewed the Navy's August 2017 Draft Supplemental Environmental Impact Statement for Land-Water Interface and Service Pier Extension at Naval Base Kitsap Bangor, EPA Region 10 Project Number: 13-008-DOD/CEQ Project Number: 20170155.

The EPA is providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR § 1500-1508) and Section 309 of the Clean Air Act. Section 309 directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the DEIS prepared for the proposed action considers expected environmental impacts and the adequacy of the EIS in meeting procedural and public disclosure requirements of the NEPA. We are assigning the DSEIS a Lack of Objections (LO) rating. A copy of our rating system is enclosed.

We continue to agree the short pier Service Pier Extension alternative (Alternative 2) is the environmentally preferred action alternative, and we appreciate that Alternative 2 remains the Navy's preferred action alternative.

The EPA will continue to participate on this project as a member of the Interagency Review Team. We note that refinements to the analysis of aquatic resource impacts from this project are likely to be needed for the permitting process. In addition, we have ongoing concern regarding the difficulties involved in locating adequate compensatory mitigation sites around Hood Canal for offsetting sub-tidal aquatic resource impacts.

Thank you for this opportunity to provide comments. If you have any questions or would like to discuss these comments in more detail, please contact Erik Peterson of my staff at (206) 553-6382 or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov), or contact me at (206) 553-0248 or [nogi.jill@epa.gov](mailto:nogi.jill@epa.gov).

Sincerely,

Jill A. Nogi, Manager  
Office of Environmental Review and Assessment

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

A

A. Thank you for your comments.

B

B. As stated in Appendix B, Mitigation Action Plan, the proposed Compensatory Mitigation is to use the Hood Canal Coordinating Council's In-Lieu Fee (ILF) program. The Navy concurs that the analysis of aquatic resource impacts will be refined as the Navy completes the permitting process in coordination with the ILF Program and Interagency Review Team (IRT), which includes the USEPA.

C

C. Comment noted.

Comment ID: M-001

Received: October 2, 2017 Navy Response to Comment M-001:

U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.



Comment ID: M-002

Received: October 13, 2017 Navy Response to Comment M-002:



PHONE (360) 598-3311  
Fax (360) 598-6295  
<http://www.suquamish.nsn.us>

THE SUQUAMISH  
TRIBE

PO Box 498 Suquamish, WA

October 13, 2017

Naval Facilities Engineering Command, Northwest  
1101 Tautog Circle  
Silverdale, WA 98315-1101  
ATTN: LWI/SPE SEIS Project Manager

Subject: Draft SEIS Comments for proposed Service Pier Extension project, Naval Base Kitsap-Bangor

Dear LWI/SPE SEIS Project Manager:

This letter transmits the Suquamish Tribe's ("Suquamish") comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the Service Pier Extension (SPE) project proposed by the Navy at Naval Base Kitsap - Bangor. Suquamish is a signatory to the 1855 Treaty of Point Elliott and the proposed SPE project is located within Suquamish's usual and accustomed fishing grounds and stations ("U&A").

Based on information received during previous communication with the Navy, including participation in a multi-agency meeting pre-public scoping meeting on February 13, 2013, review of the DEIS and the Draft SEIS, and information obtained at the Hood Canal Coordinating Council (HCCC) In Lieu Fee (ILF) Interagency Review Team (IRT) meeting on October 5, 2017, Suquamish finds that the proposed SPE project will likely result in significant and cumulative impacts to natural resources, nearshore, marine, and upland habitats. In addition, the SPE project would have impacts to tribal fisheries from added overwater coverage and increased vessel traffic related to both construction and operation of the project.

As described in the Draft SEIS, subsequent to the completion of a Final EIS on the Land Water Interface ("LWI")/Service Pier Extension projects in 2016, U.S. Congress approved funding for the SPE project (note: the LWI project was previously funded), and the Navy revised the design, construction methods, and the timing of the SPE project. In addition, in August 2016 the National Marine Fisheries Service (NMFS) finalized new technical guidance for assessing underwater noise effects on marine mammals, which influenced regulatory consultation requirements under the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA). Based on these project changes and new technical guidance from NMFS, the Navy decided to prepare a SEIS.

Thank you for your comments.

- A. The Draft and Final SEIS disclose impacts from the SPE project on tribal fisheries during both construction and operation. The Navy proposes measures to avoid, minimize, and/or mitigate all significant impacts and is coordinating with the Tribes, USFWS, NMFS, USEPA, WDOE, USACE, and the HCCC.

Comment ID: M-002 (continued)

Received: October 13, 2017 Navy Response to Comment M-002:

Draft SEIS Service Pier Extension  
October 13, 2017  
Page 2

Suquamish previously submitted Scoping comments on the LWI-SPE project on March 15, 2013, as well as comments on the DEIS of the Land Water Interface/Service Pier Extension on April 13, 2015.

**A. PURPOSE AND NEED**

As stated in the Draft SEIS, the Purpose of the SPE is to "provide additional maintenance berthing capacity and improve support facilities for existing homeported and visiting submarines at Naval Base (NAVBASE) Kitsap Bangor". The SPE project is needed to:

"Provide alternative opportunities for berthing to mitigate restrictions at NAVBASE Kitsap Bremerton on navigating SEAWOLF Class submarines through Rich Passage under certain tidal conditions; improve long-term operational effectiveness for the three SEAWOLF Class submarines on NAVBASE Kitsap; provide berthing and logistical support for SEAWOLF, LOS ANGELES, and VIRGINIA classes of submarines at the Navy's submarine research, development, test, and evaluation hub, which is located at NAVBASE Kitsap Bangor; and improve submarine crew training and readiness through co-location of command functions at NAVBASE Kitsap Bangor submarine training center".

**B. ACTION ALTERNATIVES**

Two action alternatives (Alternative 1 is no action) for the SPE are described in the Draft SEIS—a short pier configuration and a long pier configuration. SPE Alternative 2 (Short Pier Configuration) is the Navy's preferred alternative, and would be approximately 520 ft long by 68 ft wide (approx. 0.89 acres total overwater coverage) pier extension to the existing Service Pier; 203 permanent 36" steel piles; 103 permanent 18" concrete fender piles; 50 permanent 24" small craft mooring and dolphin steel piles (for Port Security Barrier reconfiguration); and a new wave screen that would be approx. 200 ft long by 27 ft high, concrete or steel, attached to existing piles. SPE Alternative 3 (Long Pier Configuration) would be 975 ft long by 68 ft wide (approx. 1.61 acres total overwater coverage) pier extension to the existing Service Pier; 500 permanent 24" steel piles; 160 permanent 18" concrete fender piles; 50 permanent 24" small craft mooring and dolphin steel piles (for Port Security Barrier reconfiguration); and a new wave screen that would be approx. 200 ft long by 27 ft high, concrete or steel, attached to existing piles.

Alternative 2 (Short Pier) would involve 160 pile driving days (across 2 in-water work seasons [July 16 – January 15]), and Alternative 3 (Long Pier) would involve 205 pile driving days (across 2 in-water work seasons).

Both SPE action alternatives would involve: (1) a 2,100 sf Pier Services and Compressor building located on the Service Pier; (2) one pier crane on a 28 ft by 60 ft foundation; (3) 50,000 sf Waterfront Support Building; (4) 420 space parking lot; and (5) seven acres of permanently disturbed upland area that includes gravel covered storage/laydown area.

Comment ID: M-002 (continued)

Received: October 13, 2017 Navy Response to Comment M-002:

Draft SEIS Service Pier Extension  
October 13, 2017  
Page 3

Both action alternatives are designed to occur in two phases. Phase 1 would include waterfront construction of the pier extension (including support facilities on the pier) and the upland development of construction laydown/staging and new 420 space parking lot. Phase 2 includes construction of the upland area Waterfront Ship Support Building at the site of an existing parking lot. Phase 1 construction would be from Fall 2018-Fall 2020, and Phase 2 construction from Fall 2020-Fall 2022.

The number of construction barge trips associated with both action alternatives (Short Pier and Long Pier) would be an average of 6 roundtrip barge trips/month. Operations of both action alternatives would involve an increase in average number of one-way Hood Canal submarine transits to or from the Service Pier from 0.5/month to 2/month.

**C. SUQUAMISH COMMENTS**

The purpose and need of the SPE is to accommodate the transfer of two submarines from Bremerton to Bangor. The Navy needs to consider options to eliminate and minimize impacts to the marine/nearshore environment by constructing temporary structures that can be removed when the purpose and need has been met, and removing overwater structures that are no longer in use. Suquamish requests that the SPE project be dismantled once this purpose and need has been met.

Suquamish also requests that the Navy conduct an assessment that evaluates options for the removal of overwater structures at NAVBASE Bremerton because demands have been transferred to Bangor (with the construction of SPE).

Eelgrass Beds (Chapter 3 of the Draft SEIS)

Eelgrass beds (as defined in the most recent survey in 2012) occur along the margins of the construction zone. Because it has been more than 5 years since the last survey in the vicinity of the SPE, Suquamish requests that an updated survey of eelgrass and macroalgae be conducted during the June 1 – October 1 period and prior to issuance of a Corps permit. Depending on the results of these surveys, adjustments may be needed in the Mitigation Use Plan, including avoidance, minimization, and compensatory mitigation identified.

Wave Screen (Chapter 3 of the Draft SEIS)

Long-term operational impacts from the new wave screen would extend beyond its more linear footprint. The SEIS needs to more adequately assess wave screen impacts to wind/wave energy and implications for sediment supply, transport, and deposition in the vicinity of the SPE and Carlson Spit and to the shoreline downdrift of the SPE.

In addition to wave screen impacts, the SEIS needs to assess the same impacts to wind/wave energy and sediment processes resulting from the long-term berthing of submarines at the SPE.

- B. The SPE and supporting facilities would address a number of infrastructure deficiencies on NAVBASE Kitsap (both NAVBASE Kitsap Bangor and NAVBASE Kitsap Bremerton) to ensure its capability to support the SEAWOLF fleet. As stated in Section 1.2 of the Draft SEIS, the design life of the SPE Proposed Action is 50 years, but the purpose and need will continue as long as the mission requires. Further, temporary structures were considered as a potential alternative but were not carried forward for analysis since they would not be able to accommodate berthing and load requirements. Chapter 2 of the SEIS has been updated to acknowledge this alternative as considered but not carried forward for analysis.
- C. The proposed SPE project would not eliminate the remaining mission requirements that are performed at existing overwater structures at NAVBASE Kitsap Bremerton. This comment does not warrant a change to the text of the SEIS.
- D. The Navy conducted an eelgrass and macroalgae survey in June and July of 2018. The results confirmed the continued presence of two eelgrass beds previously surveyed in 2012. Both eelgrass beds are located within the nearshore environment and outside the project footprint and construction corridor. See Section 3.2.1.1 for the details of the survey results.
- E. The Navy has conducted a sediment transport study and results have been incorporated into Sections 3.1 and 4.1 of the Final SEIS.
- F. Longshore sediment transport within the study area is generally from south to north along the shoreline. Analysis conducted on sediment transport at the proposed SPE extension demonstrated that the potential effects on sediment transport from the project would occur primarily between the pier structure and the shore. The submarines are proposed to be berthed on the north (waterward) side of the pier structure. In addition, the submarines would be berthed in water deeper than approximately -55 mean lower low water and more than 200 feet from shore. The orientation of the submarines, combined with the depth of the berthing area is anticipated to not have substantial effects on sediment transport.

Comment ID: M-002 (continued)

Received: October 13, 2017 Navy Response to Comment M-002:

Draft SEIS Service Pier Extension  
October 13, 2017  
Page 4

Artificial Lighting (Chapter 3 of the Draft SEIS)

Artificial lighting (at nighttime) will be placed on the SPE and will likely contribute to significant cumulative impacts to salmon, forage fish species, and other biota through disruption of predator/prey interactions. These impacts are not adequately assessed in the Draft SEIS and no mitigation for the impacts of artificial lighting is proposed.

G

G. As discussed in Section 3.3.1.2 of the Draft SEIS, artificial lighting added to the SPE would occur over deeper water (at least 30 feet below mean lower low water) and would have little to no effect on biota and EFH utilized by migratory species of nearshore fish, such as forage fish and juvenile salmonids. Further, artificial lighting is not anticipated to alter the behavior of juvenile salmonids using the nearshore migratory pathway. The pier lighting system has been designed and placed for night-time illumination of deck surfaces while minimizing illumination of waters. The calculated average illumination levels on the water surface are: Water surface from 0 to 50 feet from the edge of the pier deck: 0.50 foot candles, Water surface from the 50 feet to 100 feet from the edge of the pier deck: 0.05 foot candles. Additionally, SPE lighting system would occur over deeper water (at least 30 feet below mean lower low water), would have little to no effect on fish habitat, and is not anticipated to alter the behavior of juvenile salmonids using the nearshore migratory pathway.

Underwater Noise (Chapter 3 of the Draft SEIS)

In addition to construction-related underwater noise (i.e., primarily pile driving during at least 2 in water work windows (proposed July 16-January 15), there will be long-term operational impacts as a result of underwater noise generated by the added two submarines that would be birthed at the SPE. This additional underwater noise is cumulative when considering other operational underwater noise related to the Bangor waterfront.

H

H. Long-term underwater noise from maintenance on two additional submarines may increase above ambient conditions of the industrial waterfront in general but these increases would be localized and negligible (see Section 3.3.2.3.2 of the 2016 Final EIS).

Cumulative Impacts (Chapter 4 of the Draft SEIS)

The Draft SEIS [restated from Section 4.3.1.1 of the 2016 Final EIS (LWI/SPE)] accurately concludes that “the SPE project would contribute cumulatively to changes in sediment supply within Hood Canal, as well as long-term changes in sediment deposition and erosion patterns within NAVBASE Kitsap Bangor” (FEIS referenced MacLennan and Johannessen, 2014).

I

Suquamish is concerned that the cumulative impacts resulting from the proposed SPE project, in combination with the many other past, present, and reasonably foreseeable future federal and non-federal actions in the Hood Canal area are not only significant, but at risk of not being adequately mitigated. In particular, there are several recent (e.g., EHW2), current and/or proposed (e.g., Land Water Interface, Transit Protection System Pier) Navy construction actions occurring along the Bangor shoreline during the next several years that involve pile driving, construction of overwater structures, shoreline abutments or armoring, and other actions.

I. As discussed in Section 4.7 of the Draft SEIS, the SPE project's contribution to cumulative impacts would be offset through implementation of appropriate mitigation measures through consultations between the Navy and affected tribes as discussed in Section 3.7.3.

Compensatory Mitigation (Appendix B)

The Navy's preference for offsetting unavoidable environmental impacts associated with the SPE project is to purchase credits from the Hood Canal In Lieu Fee (ILF) Mitigation Program. The adequacy of this mitigation will depend in part on the scope and adequacy of specific impacts identified and described in the Mitigation Action Plan (Appendix B of the Draft SEIS), and the ability to identify appropriate sites for mitigating these various environmental impacts through the ILF Program. It is exceedingly difficult, if not impossible at this time, to identify in kind mitigation (i.e., by removal of large scale overwater structures) in the Hood Canal region to offset environmental impacts associated with a new overwater structure such as the Service Pier Extension.

J

J. The Navy is working with the USACE, WDOE, and the HCCC ILF Program to quantify SPE's impacts and calculate habitat credits to be purchased that will mitigate the projects' impacts. As a member of the ILF Program's Interagency Review Team, the Suquamish Tribe will have the opportunity to participate in this process.



Comment ID: M-002 (continued)

Received: October 13, 2017

Navy Response to Comment M-002:

Draft SEIS Service Pier Extension  
October 13, 2017  
Page 5

Suquamish is concerned with how the Navy quantifies some of the functional impacts from the SPE and how this translates into compensatory mitigation. Suquamish has representation on the HCCC ILF Interagency Review Team (IRT) and is evaluating this closely.

Suquamish strongly objects to the Navy's ILF mitigation approach to "scale impacts" by 5% for the footprint of the SPE (a discount of 95%). This discount appears arbitrary, and is not based on available science. Notably, the discount does not appear to take into account potentially important impacts of the overwater structure on light regime that would affect juvenile salmonid behavior and overall predator/prey interactions under and near the pier. Such a discount also does not fully account for the cumulative impacts of additional present and foreseeable future overwater structures along the Bangor waterfront.

The Navy may also need to account and mitigate for upland riparian impacts associated with construction and long-term operation of a 420-space parking lot (that is currently forested). Although a road (Sea Lion Rd) currently separates the marine shoreline and bluffs from the proposed parking lot, stormwater runoff, the loss of marine riparian habitat, and other potential environmental impacts from the parking lot need to be adequately assessed and mitigated.

Particularly given these uncertainties, the Navy needs to develop alternative compensatory mitigation option(s) outside of the HCCC ILF Program as a potential means for mitigating the SPE environmental impacts.

Cultural Resources (Chapter 3.13)

There is no mention in the Draft SEIS of any cultural resource surveys in the area of the proposed upland parking lot. Suquamish requests verification that no cultural resource surveys have been conducted in this area.

In closing, please provide the Suquamish Tribe with opportunities to participate in any multi-agency meetings and site visits associated with the SPE project. For issues concerning cultural resources, including Section 106 consultation, please contact Dennis Lewarch, the Suquamish Tribal Historic Preservation Officer at 360-394-8529. If you have other questions, please contact me at 360-394-8667.

Sincerely,



Steve Todd  
Ecologist

e-cc:  
Roma Call, Port Gamble S'Klallam Tribe  
Randy Lumper, Skokomish Tribe



K

K. The proposed action would not impact juvenile salmonid migration since the project occurs in deep water outside the migratory pathway. The Navy is working with the U.S. Army Corps of Engineers to determine the appropriate mitigation for deep water construction with no nearshore impacts using the best available science.

L

L. There will be no upland riparian habitat impacted. Please see Section 3.6.1.2 of the Draft SEIS that describes storm water structures and utilities that will be permanently added to prevent soil erosion and surface water contamination. For example, the parking lot would be subdivided into three drainage areas and terraced and graded so sheet flow would drain to landscaped areas between parking rows. The upland stormwater system has been designed to follow the Low Impact Design (LID) requirements of the Unified Facilities Criteria 3-210-10N which is intended to mimic hydrologic behavior of predeveloped conditions with no net increase in runoff volume. To achieve this goal the SPE project will route stormwater from the new upland pavement surfaces to bioretention swales then to a series of precast stormwater storage tanks located underneath the new parking lot. Treated outflow from the stormwater tanks will be directed to a gravel spreader trench dispersion system with complete infiltration. This system does not discharge stormwater to the nearshore.

M

M. Per Section 3.13.1.1.2 of the 2016 Final EIS, surveys were conducted for SPE (Stell Environmental Enterprises and Cardno TEC 2013). Please see section 3.13.2.3.2 of the 2016 Final EIS for conclusion and concurrence from SHPO. Further, In the event of discovery of archaeological resources with the potential to yield important information, the Navy would develop and implement mitigation measures in consultation with SHPO and affected American Indian tribes, and possibly the ACHP. In the event of inadvertent discovery of American Indian remains, funerary items, sacred objects, or

N

items of cultural patrimony, the Navy would implement project-specific NAGPRA Plan of Action or Comprehensive Agreement to repatriate the items subject to NAGPRA.

- N. The Suquamish will be provided opportunities to participate in multi-agency meetings and site visits for the SPE project consistent with Navy policy.

Comment ID: M-002 (continued)

Received: October 13, 2017    Navy Response to Comment M-002:

Draft SEIS Service Pier Extension  
October 13, 2017  
Page 6

Scott Chitwood, Jamestown S'Klallam Tribe  
Doug Morrill, Lower Elwha Klallam Tribe  
Cynthia Rossi, Point No Point Treaty Council  
Patty Michak, Hood Canal Coordinating Council  
Kathlene Barnhart, Kitsap County  
Donna Frosthalm, Jefferson County  
Suzanne Anderson, USACE  
Brian Hooper, USACE  
Linda Storm, USEPA  
Erik Peterson, USEPA  
Lee Corum, USFWS  
Jennifer Quan, NOAA  
Rebekah Padgett, Washington Dept. of Ecology  
Chris Waldbillig, Washington Dept. of Fish and Wildlife  
Cyrilla Cook, Washington Dept. of Natural Resources

This page intentionally left blank.