

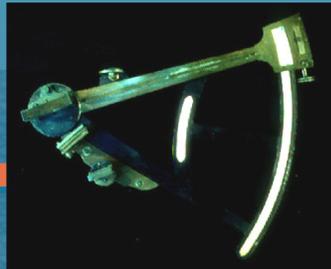


Draft

ENVIRONMENTAL ASSESSMENT

for the

**Proposed Coast Guard Acquisition and
Operation of a Privately Constructed
New National Coast Guard Museum
New London, Connecticut**



Prepared for

United States Coast Guard
USCG Headquarters
2100 2nd Street, S.W.
Washington, D.C. 20593

Prepared by

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AMEC Project # 32106-0136

Contract No. GS-10F-0230J
Order No. 24-06-G86EEB040

August 2008

~ Draft ~

ENVIRONMENTAL ASSESSMENT

Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum New London, Connecticut

Prepared for:



UNITED STATES COAST GUARD

USCG Headquarters
2100 2nd Street, SW
Washington, DC 20593

Prepared by:



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AMEC Project # 321060136

AUGUST 2008

USCG
DRAFT
ENVIRONMENTAL ASSESSMENT
FOR
PROPOSED COAST GUARD ACQUISITION AND OPERATION OF A PRIVATELY
CONSTRUCTED NEW NATIONAL COAST GUARD MUSEUM
CITY OF NEW LONDON, NEW LONDON COUNTY, CONNECTICUT

This USCG environmental assessment was prepared in accordance with Commandant's Manual Instruction M16475.1D and is in compliance with the National Environmental Policy Act of 1969 (P.L. 91-190) and the Council of Environmental Quality Regulations dated 28 November 1978 (40 CFR Parts 1500-1508).

This environmental assessment serves as a concise public document to briefly provide sufficient evidence and analysis for determining the need to prepare an environmental impact statement or a finding of no significant impact. This environmental assessment concisely describes the proposed action, the need for the proposal, the alternatives, and the environmental impacts of the proposal and alternatives.

This environmental assessment 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 EA preparation.

	<i>Draft</i>	
Date	*Preparer/Environmental Project Manager (as applicable)	Title/Position

	<i>Draft</i>	
Date	**Environmental Reviewer	Title/Position

In reaching my decision/recommendation on the USCG's proposed action, I have considered the information contained in this EA on the potential for environmental impacts.

	<i>Draft</i>	
Date	Responsible Official	Title/Position

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LEAD AGENCY: United States Coast Guard

TITLE OF PROPOSED ACTION: Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum

AFFECTED JURISDICTION: City of New London, New London County, Connecticut

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DOCUMENT DESIGNATION: Draft Environmental Assessment

ABSTRACT:

The United States Coast Guard (USCG) proposes to acquire and operate a privately constructed new National Coast Guard Museum in the City of New London, New London County, Connecticut. This Environmental Assessment (EA) addresses the potential environmental, socioeconomic, and cultural impacts of the National Coast Guard Museum Association's (NCGMA) proposed construction and the USCG's proposed acquisition, operation and maintenance of a National Coast Guard Museum. The Proposed Action is necessary to properly preserve, record and display the USCG's rich history and artifacts within close proximity to the USCG Academy, as specified in 14 United States Code (USC) §98(a), *National Coast Guard Museum*. The new National Coast Guard Museum is needed in order to properly preserve and interpret the USCG's role in United States maritime history.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 USC 4321 *et seq.*), and Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 CFR 1500-1508). In addition, the document has been prepared as prescribed in Department of Homeland Security (DHS) Management Directive 5100.1, and the USCG NEPA Manual, Commandant Instruction 16475.1D. This EA will facilitate the decision making process regarding the Proposed Action and its alternatives.

This EA evaluates the individual and cumulative effects of Parcel 1: Fort Trumbull (Alternative 1), Parcel 1A: Fort Trumbull (Alternative 2), Parcel 4A: Fort Trumbull (Alternative 3), Riverside Park (Alternative 4), and No Action (Alternative 5) with respect to a variety of criteria, including physical environment; water quality; air quality; biological resources, such as vegetation, wildlife, wildlife habitat, plant communities, protected species, and wetlands; land use; socioeconomics; noise; hazardous and toxic materials/wastes; cultural resources; infrastructure; and human health and safety, including environmental justice and children's health and safety risks.



Implementation of Alternative 1 (Parcel 1: Fort Trumbull), would result in the following anticipated impacts: positive, long-term impacts to USCG artifacts due to proper preservation, display and interpretation; potential positive, construction and operational socioeconomic impacts; minor, short-term adverse, construction-related noise impacts; less-than-significant impacts to air quality, geology, topography and soils, biological resources, and infrastructure. Implementation of Alternative 1 would require a minor modification to the existing Fort Trumbull Municipal Development Plan (MDP) and would be required to maintain the level of water dependent uses as prescribed in the Fort Trumbull Municipal Development Plan. Best Management Practices (BMPs) and mitigation measures prescribed in this EA, if implemented, would serve to reduce adverse construction-related and operational impacts to less-than-significant levels.

Implementation of Alternative 2 (Parcel 1A: Fort Trumbull), would result in the following anticipated impacts: positive, long-term impacts to USCG artifacts due to proper preservation, display and interpretation; potential positive, construction and operational socioeconomic impacts; minor, short-term adverse, construction-related noise impacts; less-than-significant impacts to air quality, geology, topography and soils, biological resources, and infrastructure. BMPs and mitigation measures prescribed in this EA, if implemented, would serve to reduce adverse construction-related and operational impacts to less-than-significant levels.

Implementation of Alternative 3 (Parcel 4A: Fort Trumbull), would result in the following anticipated impacts: positive, long-term impacts to USCG artifacts due to proper preservation, display and interpretation; potential positive, construction and operational socioeconomic impacts; minor, short-term adverse, construction-related noise impacts; less-than-significant impacts to air quality, geology, topography and soils, biological resources, and infrastructure. Implementation of Alternative 3 would require a minor modification to the existing Fort Trumbull MDP. BMPs and mitigation measures prescribed in this EA, if implemented, would serve to reduce adverse construction-related and operational impacts to less-than-significant levels.

Implementation of Alternative 4 (Riverside Park) would result in the following anticipated impacts: positive, long-term impacts to USCG artifacts due to proper preservation, display and interpretation; positive, construction-related and operational socioeconomic impacts; minor, short-term adverse, construction-related noise impacts; less-than-significant impacts to air quality, geology, topography and soils, biological resources, archaeological resources and infrastructure. Implementation of Alternative 4 would require a zoning ordinance amendment, result in a loss of less than 3-acres of park/deciduous forest, subsequently disturb habitat and vegetation, and would require infrastructure improvements. BMPs and mitigation measures prescribed in this EA, if implemented, would serve to reduce adverse construction-related and operational impacts to less-than-significant levels.

Alternative 5 (the No Action Alternative) was found not to satisfy the purpose of or need for the Proposed Action; Alternative 5 would not provide a facility large enough to properly preserve, record or display the USCG's rich history and artifacts. Implementation of Alternative 5 would result in the following anticipated impacts: minor, long-term adverse socioeconomic impacts due to the loss of potential jobs and absence of 200,000 potential visitors; moderate, long-term adverse socioeconomic impacts due to



loss of educational opportunities as related to maritime history; moderate, long-term adverse impacts to USCG artifacts due to the inadequate preservation, storage, display and interpretation.

This analysis determines that an Environmental Impact Statement (EIS) is not necessary for implementation of the Proposed Action and that a Finding of No Significant Impact (FONSI) is appropriate.



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LIST OF ACRONYMS AND ABBREVIATIONS

°C	Degree Celsius	EAC	Early Action Compact
°F	Degree Fahrenheit	EBS	Environmental Baseline Survey
ABPL	At or below poverty level	EIE	Environmental Impact Evaluation
AMSL	Above Mean Sea Level	EIS	Environmental Impact Statement
AOC	Area of Concern	EO	Executive Order
AST	Aboveground Storage Tank	ESA	Endangered Species Act
BMP	Best Management Practice	ETPH	Extractable Total Petroleum Hydrocarbons
BRAC	Base Realignment and Closure	FEMA	Federal Emergency Management Agency
CAA	Clean Air Act of 1970	FMP	Facilities Master Plan
CAAA	Clean Air Act Amendments of 1990	FONSI	Finding of No Significant Impact
CCMA	Connecticut Coastal Management Act	FOST	Finding of Suitability to Transfer
CEQ	Council of Environmental Quality	FS	Feasibility Study
CFR	Code of Federal Regulations	FT	Feet
CGS	Connecticut General Statutes	HTMW	Hazardous and Toxic Materials/Waste
CO	Carbon Monoxide	HUD	United States Department of Housing and Urban Development
COMDTINST	Commandant Instruction	I-95	Interstate-95
ConnDOT	Connecticut Department of Transportation	IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
CTDEP	Connecticut Department of Environmental Protection	L_{dn}	Day-Night Level
CZMA	Coastal Zone Management Act	LNAPL	Light Non-Aqueous Phase Liquids
dBA	A-weighted in Decibels	LOMR-F	Letter of Map Revision based on Fill
DECD	Department of Economic and Community Development		
DHS	Department of Homeland Security		
E&S	Erosion and Sedimentation		
EA	Environmental Assessment		



MD	Management Directive	POV	Privately Owned Vehicles
MDP	Municipal Development Plan	R&D	Research & Development
MOA	Memorandum of Agreement	RAP	Remedial Action Plan
MPH	Miles per Hour	RCSA	Regulations of Connecticut State Agencies
NAAQS	National Ambient Air Quality Standards	RI	Remedial Investigation
NCGMA	National Coast Guard Museum Association	RSR	Remediation Standard Regulations
NEPA	National Environmental Policy Act of 1969	SHPO	State Historic Preservation Office
NHPA	National Historic Preservation Act	SIP	State Implementation Plan
NLDC	New London Development Corporation	SO₂	Sulfur Dioxide
NOA	Notice of Availability	SO_x	Sulfur Oxides
NO_x	Nitrogen Oxides	SPCC	Spill Prevention, Control, and Countermeasures
NRCS	Natural Resources Conservation Service	STC	State Traffic Commission
NRHP	National Register of Historic Places	SVOC	Semi-Volatile Organic Compounds
NUWC	Naval Underwater Warfare Center	TPY	Tons Per Year
NWI	National Wetlands Inventory	U.S.	United States
O₃	Ozone	USC	United States Code
OLISP	Office of Long Island Sound Programs	USCG	United States Coast Guard
OMB	Office of Management and Budget	USDA	United States Department of Agriculture
Pb	Lead	USEPA	United States Environmental Protection Agency
P.L.	Public Law	UST	Underground Storage Tank
PM	Particulate Matter	VOC	Volatile Organic Compound



EXECUTIVE SUMMARY

Construction and Operation of a New National Coast Guard Museum in New London, Connecticut

This Environmental Assessment (EA) has been prepared to identify, document, and discuss the possible environmental, cultural, and socioeconomic impacts associated with the proposed United States Coast Guard (USCG) acquisition and operation of a privately constructed new National Coast Guard Museum (hereafter referred to as the new National Museum) in the City of New London, New London County, Connecticut. The new National Museum would provide a larger national museum to properly record and display the USCG's rich history and artifacts.

This EA has been prepared to document the potential for environmental impacts resulting from the National Coast Guard Museum Association's (NCGMA's) proposed construction and the USCG's proposed acquisition, operation and maintenance of a new National Museum. The EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), and Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508). In addition, the document has been prepared as prescribed in Department of Homeland Security (DHS) Management Directive (MD) 5100.1 – *Environmental Planning Program*, and the USCG Commandant Instruction (COMDTINST) M16475.1D – *NEPA Manual*.

The USCG has retained White Oaks Associates, Inc, to address Business Case questions associated with the proposed museum such as a Strategic Master Plan and the potential museum's Conceptual Program. There are several other levels of products/studies that such a firm could provide for the USCG: Opportunity Assessments, Feasibility Studies, Concept Development Plans, Strategic Business Plans, Attendance Potential Estimates Staffing Models, Implementation Plans, and Evaluation Studies. The USCG does not anticipate that the results of these studies will alter the environmental impacts of the alternatives discussed in this Environmental Assessment.

Overview of Project Purpose and Need

The existing USCG Museum is located in one wing of Waesche Hall at the USCG Academy. The USCG seeks to obtain and operate a larger national museum to properly preserve, record and display the USCG's rich history and artifacts in New London, Connecticut and in close proximity to the USCG Academy, as specified in 14 USC §98(a), *National Coast Guard Museum* (refer to **Appendix A**). The new National Museum is needed in order to properly preserve and interpret the USCG's role in United States (U.S.) maritime history.

The primary criteria used to evaluate site alternatives were as follows: funding, accessibility, a coastal vista, water and land access from multiple transportation sources, land for a facility of at least 60,000 square feet with ability for expansion, along with outside exhibits and sufficient parking, organizational USCG linkages/relationships, and a location expected to attract more than 200,000 visitors per year. The facility would display large artifacts such as a helicopter, and Fresnel lenses.



Summary Description of the Proposed Action

The Proposed Action would involve the Federal government accepting the donation of the privately constructed new National Museum and associated land which meets the selection criteria and in accordance with 14 USC §98. The Proposed Action includes the following elements:

- To accept the donation of both the land and the privately constructed new National Museum upon its completion
- To operate and maintain a museum of at least 60,000 square feet, in addition to exterior exhibits and space for artifact storage in New London, Connecticut, within close proximity to the USCG Academy
- To transfer selected USCG artifacts, documents and staff from the Exhibition Center in Forestville, Maryland, and the current USCG Museum in New London, Connecticut to the new National Museum.

The primary goal of the proposed new National Museum is to educate visitors about the USCG's rich maritime heritage and unique contribution to homeland security, and to properly store, preserve, and display USCG artifacts. Additionally, the proposed new National Museum should pose minimal financial and operational risk to the USCG and the U.S. Furthermore, development of the surrounding property should be supportive of and consistent with a museum and museum goals.

In accordance with 14 USC §98, and per the Memorandum of Agreement (MOA) among the NCGMA, the New London Development Corporation (NLDC), the Corcoran Jennison Company, Inc., the USCG, and the State of Connecticut, the proposed new National Museum would be designed and constructed through funds obtained by the NCGMA and the State of Connecticut, with assistance from the NLDC. As specified in the MOA, the NCGMA and the State of Connecticut would begin a capital fundraising campaign for the design and construction of the new National Museum. Upon completion, the NCGMA, a private non-profit organization, would donate the new National Museum and associated land to the USCG.

Overview of Considered Project Alternatives

This EA presents the five alternatives considered for the Proposed Action:

- **Alternative 1: Parcel 1 Alternative** – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 1 in the Fort Trumbull area of New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA.
- **Alternative 2: Parcel 1A Alternative** – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 1A in the Fort Trumbull area of New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA.
- **Alternative 3: Parcel 4A Alternative** – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 4A in the Fort Trumbull area of New



London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA.

- **Alternative 4: Riverside Park Alternative** – Federal acquisition and operation of a privately constructed new National Museum at Riverside Park in New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA.
- **Alternative 5: No Action Alternative** – Continued operation of the USCG Museum at its present location at the USCG Academy in New London, Connecticut, and no Federal acquisition of land or construction and operation of a new National Museum.

The USCG considered a variety of alternatives prior to identifying the five alternatives identified above. The alternatives that were eliminated from further study did not meet one or more of the primary site selection criteria. A total of 12 locations were examined in this EA utilizing a series of applicable environmental and operational criteria in order to discern the optimal facility location.

Overview of Potential Project Impacts

As a result of the implementation of Alternative 1 (Parcel 1: Fort Trumbull), the following impacts would be anticipated:

- Less-than-significant, short-term, land use impacts due to the modification of the *Fort Trumbull MDP*.
- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Positive. Long-term impact to coastal resources due to the maintained level of water dependent use at Fort Trumbull, in accordance with the *Fort Trumbull MDP*.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.



The following impacts would be anticipated as a result of the implementation of Alternative 2 (Parcel 1A: Fort Trumbull):

- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

As a result of the implementation of Alternative 3 (Parcel 4A: Fort Trumbull), the following impacts would be anticipated:

- Less-than-significant, short-term, land use impacts due to the modification of the *Fort Trumbull MDP*.
- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Less-than-significant, long-term impact to water resources due to the potential presence of a wetland.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.



The following impacts would be anticipated as a result of the implementation of Alternative 4 (Riverside Park):

- Minor, long-term adverse land use impacts would be anticipated due to the loss of less than 3 acres of park/deciduous forest, requiring a zoning ordinance amendment.
- Less-than-significant, short-term air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance.
- Less-than-significant, long-term adverse impacts to archaeological resources due to the potential presence of buried archaeological deposits and artifacts on the property.
- Positive, long-term, impacts to USCG artifacts due to proper preservation, storage, display and interpretation of USCG artifacts.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

The following impacts would be anticipated as a result of the implementation of Alternative 5 (No Action: continued operation at the USCG Academy Library):

- Moderate, long-term adverse impacts to USCG artifacts due to the inadequate preservation, storage, display and interpretation of the artifacts and rich maritime history.
- Minor, long-term adverse socioeconomic impacts due to the loss of potential jobs and the absence of 200,000 potential visitors per year to the new National Museum.
- Moderate, long-term adverse socioeconomic impacts due to the loss of educational opportunities as related to maritime history.

It is reasonably foreseeable that the following actions would occur due to the implementation of Alternative 5; Parcel 1 (including Parcel 1A) would be the location for the proposed development of a waterfront hotel and conference center. The hotel and conference center would contain 133 rooms, a 5,000 square foot conference space, a restaurant, indoor pool and fitness center. The hotel and conference center would result in an all surface parking lot, as compared to the proposed structured parking. Parcel 4A would be developed by the NLDC into a mixed use area while providing a supporting component to the adjacent Fort Trumbull State Park. In addition, Riverside Park would remain a public park, providing recreation and forested open-



space. The City of New London does have foreseeable plans to improve the park; however, according to the City Planner, Harry Smith, the improvements would be slight as funding for park improvements is limited. However, minimal site improvements may occur, subject to funding. Further, several entities are actively pursuing development opportunities within portions of Riverside Park.

Conclusion

This analysis determines that an Environmental Impact Statement (EIS) is not necessary for the implementation of the proposed alternatives and that a Finding of No Significant Impact (FONSI) is appropriate.



**TABLE ES-1:
Summary Descriptions of Impacts (with Mitigation)
Associated with Alternatives 1, 2, 3, 4 and 5 at the Project Study Areas**

Resource Area	Alternative 1 Parcel 1		Alternative 2 Parcel 1A		Alternative 3 Parcel 4A		Alternative 4 Riverside Park		Alternative 5 No Action	
	Const.	Op.	Const.	Op.	Const.	Op.	Const.	Op.	Const.	Op.
Land Use	■	○	□	○	■	○	■	●	□	○
Air Quality	■	●	■	●	■	●	■	●	□	●
Noise	■	○	■	○	■	○	■	○	□	○
Geology, Topography, and Soils	■	○	■	○	■	○	■	○	□	○
Coastal and Water Resources	□	○	□	○	□	○	□	○	□	○
Biological Resources	■	○	■	○	■	○	■	●	□	○
Cultural Resources	--	--	--	--	--	--	--	--	--	--
Architectural Resources	□	○	□	○	□	○	□	○	□	○
Archaeological Resources	□	○	□	○	□	○	■	○	□	○
USCG Artifacts	□	●	□	●	□	●	□	●	□	●
Socioeconomics	■	●	■	●	■	●	■	●	■	●
Environmental Justice	□	○	□	○	□	○	□	○	□	○
Infrastructure	■	●	■	●	■	●	■	●	□	●
Hazardous and Toxic Materials/Wastes (HTMW)	□	○	□	○	□	○	□	○	□	○

Notes: Const. = Construction; Op. = Operation

Key to Table ES-1 Symbols

Moderate Adverse Impact	Minor Adverse Impact	No Impact	Minor Positive Impact	Moderate Positive Impact
Long-Term Impact				
●	●	○	●	●
Short-Term Impact				
■	■	□	■	■



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1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

The United States Coast Guard (USCG) proposes the future acquisition and operation of a privately constructed National Coast Guard Museum (hereby referred to as the new National Museum) in New London, Connecticut (see **Figure 1-1**). The National Coast Guard Museum Association (NCGMA), a private non-profit organization, proposes to fund the construction of a new National Museum on land that would ultimately be donated to the USCG along with the completed museum. As specified in 14 United States Code (USC) §98(a), *National Coast Guard Museum* (refer to **Appendix A**), the Commandant may establish a National Museum on lands which would be federally owned and administered by the USCG, and are located in New London, Connecticut, in close proximity to the USCG Academy. In addition, per 14 USC §98 (b) (1) and (2), except for the operation and maintenance of the new National Museum, no appropriated Federal funds shall be expended for the engineering, design, or construction of the new museum (refer to **Appendix A**).

The USCG, one of the United States (U.S.) five armed services, is one of the only armed services without a national museum. The proposed new National Museum would provide a facility to educate visitors about the USCG's rich maritime heritage and its 218-year history of providing homeland security and maritime rescues around the world (State of Connecticut *et al.* 2006).

The Proposed Action includes:

- To accept the donation of both the land and the privately constructed new National Museum upon its completion
- To operate and maintain a museum of at least 60,000 square feet (ft), in addition to exterior exhibits and space for artifact storage in New London, Connecticut, in close proximity to the USCG Academy
- To transfer selected USCG artifacts, documents and staff from the Coast Guard Exhibit Center in Forestville, Maryland, and the current USCG Museum in New London, Connecticut to the new National Museum.

The proposed new National Museum would offer a larger, centralized facility to properly record and display the USCG's rich history and artifacts (USCG 2000). The Museum's required proximity to the USCG Academy is ideally suited to support institutional and field training.

1.1.1 Environmental Assessment Framework

This Environmental Assessment (EA) has been prepared to document the potential for environmental impacts resulting from the NCGMA's proposed construction and the USCG's proposed acquisition, operation and maintenance of a National Museum in New London, Connecticut. The EA has been prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 USC 4321 *et seq.*), and the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40



Code of Federal Regulations [CFR] 1500-1508). In addition, the document has been prepared as prescribed in Department of Homeland Security (DHS) Management Directive (MD) 5100.1 – *Environmental Planning Program*, and the USCG Commandant Instruction (COMDTINST) M16475.1D – *NEPA Manual*.

The USCG has retained White Oaks Associates, Inc, to address Business Case questions associated with the proposed museum such as a Strategic Master Plan and the potential museum’s Conceptual Program. There are several other levels of products/studies that such a firm could provide for the USCG: Opportunity Assessments, Feasibility Studies, Concept Development Plans, Strategic Business Plans, Attendance Potential Estimates Staffing Models, Implementation Plans, and Evaluation Studies. The USCG does not anticipate that the results of these studies will alter the environmental impacts of the alternatives discussed in this Environmental Assessment.

Appendix B provides a discussion of commonly encountered NEPA concepts, terminology, and significance criteria. Additional applicable laws and regulations are presented in **Appendix C**.

1.1.2 Background

The current USCG Museum is located in one wing of Waesche Hall, at the USCG Academy Library in New London, Connecticut (see **Figure 1-1**). It has been at this location for the past 25 years. The museum has approximately 5,000 square ft of space for storage, exhibits, and administrative duties. As a result of the limited space, it cannot display large artifacts or traveling exhibits. In addition, most of the USCG’s artifacts are either in storage or on loan to other institutions (e.g., the Coast Guard Exhibit Center in Forestville, Maryland). It is estimated that the USGC loans artifacts to approximately 250 institutions annually. The USCG Academy currently provides funding for all utilities, maintenance, and security. Currently, the museum has one full-time employee, and approximately 20 part-time volunteers. The *United States Coast Guard Museum Feasibility, Programming and Siting Study* concluded that the current museum is far below the space required for such a facility, even with its present visitation (USCG 1999). The existing museum serves approximately 20,000 visitors annually.

As noted by the Coast Guard Historian, “the Coast Guard has served our Nation for over 210 years...yet the public, as well as the men and women in today’s Service, has little idea how these watchwords [Honor, Respect, and Devotion to Duty] are spliced with the Service’s past” (Browning 2001). To a great extent, this situation arises from the inadequacy of the current USCG Museum.

In 1999, the New London Development Corporation (NLDC), in association with the Connecticut Department of Economic and Community Development (DECD), undertook a municipal development planning project in the Fort Trumbull area. NLDC serves as an agent for the City of New London in the implementation of the Municipal Development Plan (MDP). Prior to initiating the municipal development planning process, an EA and an Environmental Impact Evaluation (EIE) were completed. The New London City Council gave authority to NLDC to prepare the MDP for the Fort Trumbull area in a resolution passed in May 1998 (NLDC 2000).

The MDP was initially released in August 1999, and approved by the Southeastern Council of Governments, the New London City Council, and the State of Connecticut. The plan calls for acquisition of designated properties, development of new streets and infrastructure and preparation of parcels for future development and for disposition for future development. The



goal of the MDP in the Fort Trumbull area is to develop an economic asset for the City of New London that will create jobs, generate tax revenue, and result in spin-off economic activity. The plan includes the conversion of approximately 45 acres of blighted and underutilized land to an attractive new site for the Fort Trumbull State Park, a Research and Development (R&D) center, a hotel and conference center, residential areas, and a museum. The MDP initially divided the area into seven parcels, but did not specify the exact plans for development, except for Parcel 1 (the hotel and conference center). Several minor modifications to the *Fort Trumbull MDP* have been approved for the MDP since its release in August 1999 (NLDC 2000).

The City of New London authorized NLDC to purchase property in the Fort Trumbull area. NLDC offered to purchase all 115 parcels. NLDC purchased the majority of the properties, but nine owners did not wish to sell to the corporation. The City of New London chose to exercise its power of eminent domain, ordering NLDC to condemn the nine petitioner's properties. *Sussette Kelo et al. v. City of New London et al.* was argued on 13 March 2002 in the Superior Court in the judicial district of New London; judgment in part for the plaintiffs and in part for the defendants permitting the taking of certain of the properties, from which the plaintiffs appealed and the defendants cross appealed. The case was argued on 2 December 2002 in the Supreme Court of Connecticut. The Supreme Court of Connecticut reversed the findings of the Superior Court and upheld all of the takings (refer to *843 A.2d 500*). The owners petitioned for a *writ of certiorari*, which the United States Supreme Court granted. The case was argued in the Supreme Court of the United States on 22 February 2005. On 23 June 2005, the Supreme Court of the United States held a decision that the general benefits a community enjoyed from economic growth qualified such redevelopment plans as a permissible "public use" under the Takings Clause of the Fifth Amendment (refer to *545 U.S. 469*).

In 2000, the City of New London considered various options for the revitalization of Riverside Park. The City of New London entered into a lease agreement with the Children's Museum of South Eastern Connecticut. However, the agreement is no longer valid, and the Children's Museum decided not to move into the Riverside Park area. In addition, The USCG Academy has considered several opportunities for development within Riverside Park. The USCG Academy grounds are intensely developed with limited open space available for new construction. Riverside Park has been considered due to its proximity, size and potential availability. The USCG Academy prepared a Facilities Master Plan (FMP) in 2006 which includes potential development within a portion of Riverside Park (USCG Academy 2007).

In February 2000, a Planning Proposal for the Proposed National Coast Guard Museum was completed by USCG Civil Engineering Unit Providence. The purpose of the planning proposal is to obtain concept approval for the acquisition of land adjacent to Fort Trumbull, and the construction of a new National Coast Guard Museum on the site by the NCGMA. The timeline for this project is linked to the success of fundraising efforts by the NCGMA, which is responsible for all aspects of project funding, project development, and all phases of design and construction of the new National Museum building, the surrounding site, and all exhibits. Once the new National Museum is constructed, ownership of the structure and all associated site improvements would be transferred to the USCG (CEU Providence 2000).

The USCG performed the *Environmental Assessment Land Acquisition for the National Coast Guard Museum* (USCG 2002). The EA considered potential impacts of a decision by the USCG, subject to site requirement criteria, whether or not to accept land for the private construction of a new National Museum to replace its existing museum. In seeking early public



input on the proposed museum, the USCG advertised and conducted two separate public information-gathering meetings on 28 June 2001, in New London, Connecticut at the Army National Guard Armory. Legal notices of the meetings were published in the *New London Day* on 19, 24 and 27 June 2001. Attendees at the two meetings highlighted a number of issues previously identified by the USCG as important to the scope of the EA (USCG 2002).

The USCG considered the comments from the aforementioned public participation in the preparation of the Draft EA, published on 21 November 2001. The USCG published a Notice of Availability (NOA) for the Draft EA in the *New London Day* and in the *Federal Register* on 21 November 2001 (see *Federal Register*, Volume 66, Number 225, Pages 58547-58548). The NOA initiated a 45-day public review of the Draft EA, which was distributed to relevant Federal and State agencies. The public review period was extended an additional 30 days, concluding on 8 February 2002. The Final EA and Finding of No Significant Impacts (FONSI) were published in March 2002 (USCG 2002).

Twenty-eight proposed sites were considered for evaluation in the EA. Twenty-five sites were eliminated from further analysis, as they did not meet one or more of the primary site selection criteria identified in the EA. Three alternatives met the primary site selection criteria and were considered valid by the USCG for implementation of the Proposed Action, including: the No Action Alternative, which would continue the operation of the existing Coast Guard Museum in Waesche Hall at the USGC Academy, the Riverside Park Alternative and the Fort Trumbull Area (Parcel 4A) Alternative. The EA concluded that none of the alternatives would result in a significant impact to the human environment. The USCG identified the Fort Trumbull Area (Parcel 4A) Alternative as its Preferred Alternative (USCG 2002).

Following the release of the *Final Environmental Assessment Land Acquisition for the National Coast Guard Museum*, in March 2002, the USCG reconsidered the alternatives evaluated in the EA and decided to restart the EA process. Ten alternatives were examined utilizing a series of applicable environmental and operational criteria in order to discern the optimal facility location. Eight alternative locations were eliminated from further study since they did not meet one or more of the primary site selection criteria. Three alternatives met the primary site selection criteria and were considered valid by the USCG for implementation of the Proposed Action, including: the No Action Alternative, which would continue the operation of the existing Coast Guard Museum in Waesche Hall at the USGC Academy, the Riverside Park Alternative and the Fort Trumbull Area (Parcel 1A) Alternative. The EA concluded that none of the alternatives would result in a significant impact to the human environment. The USCG identified the Fort Trumbull Area (Parcel 1A) Alternative as its Preferred Alternative.

The USCG published an NOA on 10 May 2007 in the *New London Day* for the Draft EA for the proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum. The Draft EA was released for two consecutive 30-day public comment periods (10 May 2007 through 8 July 2007).

In response to several public comments received on the Draft EA, the USCG reevaluated the alternatives considered in this Draft EA. **Appendix H** provides a summary of the comments received during this public comment period. **Section 1.3** provides an overview of the various alternatives that were considered, as well as the alternatives retained and analyzed fully within this EA. **Section 1.4** details the agency and public involvement process.



1.2 Purpose and Need

The purpose of the Proposed Action is to provide a new National Museum that would be large enough to properly preserve, record, and display the USCG's history and artifacts, and would be in close proximity to the USCG Academy, as specified in USC 14 §98 (refer to **Appendix A**); this would be accomplished through the acceptance of the donated land and the privately constructed new National Museum upon its completion.

The need for the Proposed Action has become increasingly apparent because of the insufficient space and limited expansion capability of the current USCG Museum, as noted in the *United States Coast Guard Museum Feasibility, Programming and Siting Study*:

"Many of the large artifacts cannot be displayed at the current site due to a lack of space. Missing from the current exhibits is the service's collection of historic lifesaving craft. Also missing from display are helicopters, which are important to modern search and rescue efforts, as well as hundreds of large exhibits that cannot be shown due to lack of space. Additionally, there is no room for traveling exhibits, which attract additional patrons and provide additional means to educate the public.

"These artifacts can tell a powerful and extremely important story. But currently one must travel to dozens of museums and locations to see the full range of the Coast Guard's artifacts, most of which are in storage or on loan to other institutions because of lack of space. The Coast Guard needs to bring its large collection of artifacts together for exhibition in a modern museum. The new museum would permit this consolidation.

"The Coast Guard museum would also be an educational crossroads for the service and an educational resource for the public. It would teach future leaders, host adult and children's educational programs, be a place for groups to gather, and would sponsor conferences and seminars for the community. The museum would share the Coast Guard's maritime heritage and reinforce the multi-mission nature of the service of today, increase the visibility and awareness of the service, and would ensure that all visitors have an exciting learning experience. Most importantly it would ensure that all visitors come away with the knowledge that those who served in the past and those who serve today have done so with honor, respect, and devotion to duty (USCG 1999)."

The proposed facility would offer adequate space for the USCG to acquire, preserve, and display items of material culture relating to the USCG in all its forms from its establishment to the present. It would be ideally suited to support education to the public, to the USCG Academy Corps of Cadets, and the USCG, about the service and its missions. The new National Museum would also assist in historical research on topics related to the USCG. With a more visible site, the *Feasibility Study* proposes the new National Museum would attract approximately 40,000 visitors within the first year of operation, double the current number of visitors per year, and up to 200,000 visitors annually within 5 years (USCG 1999).



1.3 Scope of the EA

The scope of this EA includes the full breadth of potential environmental, cultural, and socioeconomic impacts to the environment and resources at New London, Connecticut, and vicinity that could result from the Proposed Action of Federal acquisition and operation of a privately constructed new National Museum, the reasonable alternatives to the acquisition, and any connected actions associated with the proposed acquisition or alternatives. Resource categories that are analyzed include physical environment; water quality; groundwater; air quality; biological resources, including vegetation, wildlife, wildlife habitat, plant communities, protected species, and wetlands; land use; socioeconomic environment; noise; hazardous and toxic materials/wastes (HTMW); cultural resources; infrastructure; and human health and safety, including environmental justice and children's health and safety risks.

This EA provides a full comparative analysis of five possible alternatives, summarized as follows

- Alternative 1: Parcel 1 Fort Trumbull – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 1 in the Fort Trumbull area of New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA. A more detailed description of Alternative 1, including connected actions, is provided in **Section 3.1**.
- Alternative 2: Parcel 1A Fort Trumbull – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 1A in the Fort Trumbull area of New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA. A more detailed description of Alternative 2, including connected actions, is provided in **Section 3.2**.
- Alternative 3: Parcel 4A Fort Trumbull – Federal acquisition and operation of a privately constructed new National Museum upon Parcel 4A in the Fort Trumbull area of New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA. A more detailed description of Alternative 3, including connected actions, is provided in **Section 3.3**.
- Alternative 4: Riverside Park Alternative – Federal acquisition and operation of a privately constructed new National Museum at Riverside Park in New London, Connecticut. Upon completion, the new National Museum and associated land would be donated to the USCG from the NCGMA. A more detailed description of Alternative 4, including connected actions, is provided in **Section 3.4**.
- Alternative 5: No Action Alternative – Continued operation of the USCG Museum at its present location at the USCG Academy in New London, Connecticut, and no Federal acquisition of land or construction and operation of a new National Museum. **Section 3.5** provides a more detailed description of Alternative 5, including the connected actions related to the No Action Alternative.

Section 3.6 provides descriptions and analyses of the various alternatives that were considered, but eliminated from consideration with respect to the Proposed Action, as they do not adequately meet the purpose and need for the Proposed Action, or were determined to be logistically infeasible. All of the evaluated alternatives, with the exception of the No Action



Alternative which must be analyzed per CEQ regulations to establish a baseline, meet the selection criteria presented in **Section 3.0**.

1.4 Agency and Public Involvement

As specified in NEPA (42 USC 4321 *et seq.*) and NEPA's implementing regulations promulgated by the CEQ (40 CFR 1500-1508), and the guidance provided in the USCG NEPA Manual (COMDTINST M16475.1D), public participation is a significant component of the NEPA process. The following provides a listing of key public notification and participation events that will occur as part of this environmental review process:

- The USCG conducted interagency and intergovernmental coordination for environmental planning (IICEP) in December 2006, pursuant to the requirements of NEPA as required under Executive Order (EO) 12372, which has since been superseded by EO 12416, *Intergovernmental Review of Federal Programs*, and subsequently supplemented by EO 13132. A list of agencies and individuals consulted is provided in **Section 10**. Copies of the IICEP letters submitted to the respective agencies and individuals, as well as responses received, are included in **Appendix D**. These agencies have also been furnished with copies of the Draft EA.
- The USCG published an NOA in the *New London Day* on 10 May 2007 for the *Draft Environmental Assessment for the proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum*. The Draft EA and Draft FONSI were made available online at <http://www.uscg.mil/hq/cg4/cg443/>. Copies of the Draft EA, Draft FONSI and important reference documents are also available for public review at the New London Public Library. The USCG's Director for Governmental and Public Affairs (CG-092) was the primary point of contact for any inquiries from the local news media. The Draft EA was released for two consecutive 30-day public comment periods (10 May 2007 through 8 July 2007). **Appendix H** provides summaries of the public comments received during the public comment period.

In response to several public comments received on the Draft EA, the USCG reevaluated the alternatives considered.

- The USCG conducted additional IICEP in January 2008, pursuant to the requirements of NEPA, to include the additional alternative locations considered in the EA. A list of agencies and individuals consulted is provided in **Section 10**. Copies of the IICEP letters submitted to the respective agencies and individuals, as well as responses received, are included in **Appendix D**. These agencies have also been furnished with copies of the Draft EA.
- The USCG, as the proponent of the proposed project, is responsible to publish and distribute the Draft EA for a 30-day public comment period. Notification of the availability of the Draft EA has been accomplished through publication of a legal NOA in *The New London Day*, the local newspaper that services the region of New London, Connecticut. Furthermore, the Draft EA is available online at <http://www.uscg.mil/hq/cg4/cg443/>. Copies of the Draft EA and important reference documents are also available for public review at the New London Public Library. The USCG's Director for Governmental and Public Affairs (CG-092) is the primary point of



contact for any inquiries from the local news media. The USCG is responsible for receiving comments during the 30-day public comment period.

- The USCG conducted formal consultation with Federally-recognized Native American tribes, as required by Section 101(d)(6)(B) of National Historic Preservation Act (NHPA). These entities have been invited to participate in the EA process as an Indian tribe or Native Hawaiian organization, per Section 101(d)(6)(B). A list of the Federally-recognized Native American tribes consulted is provided in **Section 10**. Copies of the letters submitted to the respective Federally-recognized Native American tribes, as well as the responses received, are included in **Appendix D** of the Draft EA. Where applicable, these entities have been furnished with copies of the Draft EA and Draft FONSI during its public circulation.
- The USCG will receive responses and/or comment letters from all interested parties in association with the public circulation of the Draft EA and Draft FONSI. Copies of received responses/comments on the Draft EA and Draft FONSI, as well as responses to these comments, will be provided in the Final EA, as appropriate.
- In order to document the availability of the Final EA and FONSI (if appropriate), the USCG will publish a NOA of the Final EA and FONSI in a manner similar to that described above. As the proponent, the USCG may not take any action, other than planning the proposal, until the FONSI has been signed by all appropriate officials.



2.0 DESCRIPTION OF PROPOSED ACTION

The Proposed Action would involve the Federal Government accepting the donation of the privately constructed new National Museum and associated land which meets the selection criteria presented in **Section 3.0** and in accordance with 14 USC §98 (refer to **Appendix A**). Improvements proposed include:

- To accept the donation of both the land and the privately constructed new National museum upon its completion
- To operate and maintain a museum of at least 60,000 square ft, in addition to exterior exhibits and space for artifact storage in New London, Connecticut, or in close proximity to the USCG Academy
- To transfer selected USCG artifacts, curators, historians and documents from the Coast Guard Exhibit Center in Forestville, Maryland, and the current USCG Museum in New London, Connecticut to the new National Museum.

The primary goal of the proposed new National Museum is to educate visitors about the USCG's maritime heritage and contribution to homeland security, and to properly store, preserve, and display USCG artifacts. Additionally, the proposed new National Museum should pose minimal financial and operational risk to the USCG. Furthermore, development of the surrounding property should be supportive of and consistent with a museum and museum goals (refer to **Section 3.0**).

In accordance with 14 USC §98, and per the Memorandum of Agreement (MOA) among the NCGMA, the NLDC, the Corcoran Jennison Company, Inc., the USCG, and the State of Connecticut, the proposed new National Museum would be designed and constructed through funds obtained by the NCGMA and the State of Connecticut, with assistance from the NLDC. As specified in the MOA, the NCGMA and the State of Connecticut would begin a capital fundraising campaign for the design and construction of the new National Museum (State of Connecticut *et al.* 2006). Upon completion, the NCGMA, a private non-profit organization, would donate the new National Museum and associated land to the USCG.



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3.0 ALTERNATIVES CONSIDERED

NEPA (42 USC 4321 *et seq.*), CEQ Regulations (40 CFR 1500-1508), and the USCG NEPA Manual (COMDTINST M16475.1D) require that all reasonable alternatives be rigorously explored and objectively evaluated. In addition, alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them.

The following presents preliminary screening criteria, supported by 14 USC §98, used to identify a possible site on which to locate the proposed new National Museum. For the purposes of this discussion, an alternative was considered "reasonable" only if it meets the following criteria:

1. Property specifications (size). This includes:
 - Space for a 60,000 square foot facility
 - Space for exterior exhibits
 - Potential for expansion for artifact storage, boat display shed and IMAX theater
 - Environmentally clean
 - Fee simple title
 - Ready to move in or ready to build upon
 - Zoning classification with unrestricted building parameters.
2. Funding factors (cost). This includes:
 - Cost of land acquisition (must be donated)
 - Cost of site demolition and clearing
 - Cost of infrastructure (utilities, roads and walkways)
 - Potential for non-Federal funding.
3. Educational link to USCG Academy (proximity).
 - Close proximity to USCG Academy to provide services to enhance growth and development for current and future generations of Cadets and leadership students.
 - Close proximity to the mooring of the U.S. Barque *Eagle* at the Fort Trumbull State Park.
4. Adherence to 14 USC §98
 - Lands which will be federally owned
 - Lands located in New London, Connecticut.

These screening criteria were utilized in the evaluation of the alternative actions reviewed. Unreasonable alternatives were those that would not meet the aforementioned screening criteria.

This section identifies alternatives to the Proposed Action that were considered by the USCG. A total of 12 locations were examined by the USCG, in this EA, utilizing a series of applicable environmental and operational criteria in order to discern the optimal facility location, eight of which were eliminated from further consideration. See **Section 3.6** for further details regarding the alternatives examined by the USCG that were evaluated but eliminated from consideration.

The five locations that meet the above-listed criteria and, thus, considered valid for implementation of the Proposed Action include:



- Parcel 1 in the Fort Trumbull area of New London, Connecticut
- Parcel 1A in the Fort Trumbull area of New London, Connecticut
- Parcel 4A in the Fort Trumbull area of New London, Connecticut
- Riverside Park in New London, Connecticut
- The present location at the USCG Academy in New London, Connecticut.

3.1 Alternative 1 – Parcel 1 Alternative

Alternative 1 would involve the implementation of the Proposed Action on Parcel 1, an approximate 9.5-acre parcel, in the Fort Trumbull area of New London, Connecticut (see **Figure 2-1**). Parcel 1 is a combination of Parcels 1A and 1B, as identified in the *Fort Trumbull MDP*. This alternative meets the screening criteria presented in **Section 3.0**.

Alternative 1 would involve the future acquisition and operation of a privately constructed National Museum on Parcel 1 within the Fort Trumbull area. The NCGMA, a private non-profit organization, proposes to fund the construction of a new National Museum on land that would eventually be donated to the USCG along with the completed museum.

Parcel 1 is the former Naval Underwater Warfare Center (NUWC); in 1996, the Base Realignment and Closure (BRAC) Commission recommended the closure of NUWC New London. Currently Parcel 1 is an undeveloped, cleared site. The parcel has direct waterfront, as well as unobstructed water views, located on the Thames River, and contains a fishing wharf and a pier. Parcel 1 is transected by the Fort Trumbull Riverwalk, a 1.7 acre linear park owned by the City of New London providing public access along the waterfront of the Fort Trumbull area and connects with Fort Trumbull State Park. Parcel 1 is bordered to the north and east by the Fort Trumbull Riverwalk and the Thames River, Parcel 3A to the south (the proposed location of the USCG R&D Center), and the Amtrak rail line to the west.

Currently, Parcel 1 is owned by the NLDC. Under this alternative, the NCGMA would acquire the property from the NLDC, fund and manage the construction of a new National Museum and, upon completion, donate the new National Museum and associated land to the USCG.

Selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum. The Coast Guard Exhibit Center in Forestville, Maryland would remain in operation, continuing to store selected artifacts and documents. In addition, USCG artifacts and documents, as well the one full-time employee from the current USCG Museum at the USCG Academy would be transferred to the new National Museum. Personnel from the Coast Guard Historian's Office in Washington, DC would not be transferred as part of the Proposed Action.

Additionally, the implementation of Alternative 1 will allow for the proposed new National Museum to exhibit decommissioned USCG vessels at one of the two wharfs currently located at Parcel 1. The current channel of the Thames River will allow for vessels up to 250 ft in length, drawing up to 20 feet, to dock at the existing wharf associated with Parcel 1, such as USCG *Diver* class patrol cutters and "Island" class patrol boats (Brooks 2008, World Navies Today 2003).

As a result of Alternative 1, a previously disturbed site would become re-developed, USCG artifacts and documents would be removed from the Coast Guard Exhibit Center in Forestville,



Maryland, the current USCG Museum at the USCG Academy would be closed and artifacts, documents, full-time personnel and volunteers would be relocated. **Section 5.0** provides information regarding the potential environmental consequences of Alternative 1.

3.2 Alternative 2 – Parcel 1A Alternative

Alternative 2 would involve the implementation of the Proposed Action on Parcel 1A, an approximate 2.5-acre parcel, in the Fort Trumbull area of New London, Connecticut (see **Figure 2-2**). This alternative meets the screening criteria presented in **Section 3.0**.

Alternative 2 would involve the future acquisition and operation of a privately constructed National Museum on Parcel 1A within the Fort Trumbull area. The NCGMA, a private non-profit organization, proposes to fund the construction of a new National Museum on land that would eventually be donated to the USCG along with the completed museum.

Parcel 1A is the former NUWC; in 1996, the BRAC Commission recommended the closure of NUWC New London. Currently Parcel 1A is an undeveloped, cleared site. The parcel is not considered a waterfront property. The site has no direct waterfront, separated from the Thames River by a portion of the Fort Trumbull Riverwalk, a 1.7 acre linear park owned by the City of New London providing public access along the waterfront of the Fort Trumbull area and connects with Fort Trumbull State Park. Parcel 1A is bordered by Parcel 1B to the north, the Fort Trumbull Riverwalk to the east, Parcel 3A to the south (the proposed location of the USCG R&D Center), and the Amtrak rail line to the west.

Currently, Parcel 1A is owned by the NLDC. Under this alternative, the NCGMA would acquire the property from the NLDC, fund and manage the construction of a new National Museum and, upon completion, donate the new National Museum and associated land to the USCG.

Selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum. The Coast Guard Exhibit Center in Forestville, Maryland would remain in operation, continuing to store selected artifacts and documents. In addition, USCG artifacts and documents, as well the one full-time employee from the current USCG Museum at the USCG Academy would be transferred to the new National Museum. Personnel from the Coast Guard Historian's Office in Washington, DC would not be transferred as part of the Proposed Action.

As a result of Alternative 2, a previously disturbed site would become re-developed, USCG artifacts and documents would be removed from the Coast Guard Exhibit Center in Forestville, Maryland, the current USCG Museum at the USCG Academy would be closed and artifacts, documents, full-time personnel and volunteers would be relocated. **Section 5.0** provides information regarding the potential environmental consequences of Alternative 2.

3.3 Alternative 3 – Parcel 4A Alternative

Alternative 3 would involve the implementation of the Proposed Action on Parcel 4A, an approximate 2.5-acre parcel, in the Fort Trumbull area of New London, Connecticut (see **Figure 2-2**). This alternative meets the screening criteria presented in **Section 3.0**.

Alternative 3 would involve the future acquisition and operation of a privately constructed National Museum on Parcel 4A within the Fort Trumbull area. The NCGMA, a private non-profit



organization, proposes to fund the construction of a new National Museum on land that would eventually be donated to the USCG along with the completed museum.

Parcel 4A is the former location of several single and multi-family dwellings. Several structures still exist on Parcel 4A, including residential buildings, alleys, driveways and sidewalks; however all dwelling units are vacant. According to NLDC, existing building structures must be demolished, environmental remediation must be performed, new infrastructure must be installed, and the surrounding streets must be improved, in accordance with the *Fort Trumbull MDP*, prior to any construction activities by the NCGMA on the site. The parcel is not considered a waterfront property. It is separated from the Thames River by Fort Trumbull State Park and several other small parcels. Due to the site's elevation it has water views that extend to the south. Parcel 4A is bordered by Walbach Street and Parcel 3B to the north, East Street and Fort Trumbull State Park to the east, Trumbull Street and Parcel 4B to the south, and Smith Street and the Waste Water Treatment Plant to the west.

Currently, Parcel 4A is owned by the NLDC. Under this alternative, the NCGMA would acquire the property from the NLDC, fund and manage the construction of a new National Museum and, upon completion, donate the new National Museum and associated land to the USCG.

Selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum. The Coast Guard Exhibit Center in Forestville, Maryland would remain in operation, continuing to store selected artifacts and documents. In addition, USCG artifacts and documents, as well the one full-time employee from the current USCG Museum at the USCG Academy would be transferred to the new National Museum. Personnel from the Coast Guard Historian's Office in Washington, DC would not be transferred as part of the Proposed Action.

As a result of Alternative 3, a previously disturbed site would become re-developed, USCG artifacts and documents would be removed from the Coast Guard Exhibit Center in Forestville, Maryland, the current USCG Museum at the USCG Academy would be closed and artifacts, documents, full-time personnel and volunteers would be relocated. **Section 5.0** provides information regarding the potential environmental consequences of Alternative 3.

3.4 Alternative 4 – Riverside Park Alternative

Alternative 4 would involve the implementation of the Proposed Action on a small portion of the approximate 19-acre Riverside Park in New London, Connecticut (see **Figure 2-4**). This alternative meets the screening criteria presented in **Section 3.0**.

Riverside Park is bordered by the USCG Academy to the north, New England Central Railroad rail lines and the Thames River to the east, and private residences to the south and west. Currently, the park grounds are partially developed with recreation facilities, buildings, roads, sidewalks, parking areas and other impervious features.

Riverside Park is owned and managed by the City of New London; under this alternative, the NCGMA would acquire a small portion (less than 3 acres) of the property from the City of New London, fund and manage the construction of a new National Museum, and upon completion donate the new National Museum and associated land to the USCG.



Selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum. The Coast Guard Exhibit Center in Forestville, Maryland would remain in operation, continuing to store selected artifacts and documents. In addition, USCG artifacts and documents, as well the one full-time employee from the current USCG Museum at the USCG Academy would be transferred to the new National Museum. Personnel from the Coast Guard Historian's Office in Washington, DC would not be transferred as part of the Proposed Action.

As a result of Alternative 4, a presently underutilized and neglected park would be re-developed, the current USCG Museum at the USCG Academy would be closed and artifacts, documents, full-time personnel and volunteers would be relocated. **Section 5.0** provides information regarding the potential environmental consequences of Alternative 3.

3.5 Alternative 5 – No Action Alternative

As required under NEPA (42 USC 4321 *et seq.*), CEQ Regulations (40 CFR 1500-1508), and the USCG NEPA Manual (COMDTINST M16475.1D), the No Action Alternative, is retained in this EA for comparative analysis. Under the No Action Alternative the NCGMA would not acquire land for the private construction of a new National Museum, and therefore would not donate the proposed new National Museum to the USCG. The No Action Alternative would involve continued operation of the USCG Museum at its present location at the USCG Academy in New London, Connecticut (see **Figure 2-5**).

Under this alternative, the USCG Museum, located within Waesche Hall of the USCG Academy, would remain; lacking adequate space for exhibits and storage, and personnel support necessary for the USCG to substantively improve management and display of the USCG's maritime heritage. In addition, artifacts would continue to be stored improperly, either in storage, or on loan at other institutions. Personnel from the USCG Museum at the USCG Academy would not be relocated.

Further, the following reasonably foreseeable actions would occur due to the implementation of Alternative 5:

- Parcel 1 (a combination of Parcel 1A and Parcel 1B) would be the location for the proposed development of a waterfront hotel and conference center. The hotel and conference center would contain 133 rooms, a 5,000 square foot conference space, a restaurant, indoor pool and fitness center. The combination of the parcels would result in all surface parking, as compared to the proposed structure parking. A minor modification to the *Fort Trumbull MDP* would be required. Additional information regarding the proposed hotel and conference center is provided in **Section 5.13.1.1**.
- Parcel 4A would be developed into a mixed use area, including marina and park support, as well as residential and retail development. A minor modification to the *Fort Trumbull MDP* would be required.
- Riverside Park would potentially remain a public park, providing recreation and forested open-space. The park may remain in its current poor condition. However, minimal site improvements may occur, subject to funding. No definitive plans have been prepared at this time. However, the USCG Academy has considered several opportunities for development within Riverside Park. The USCG Academy grounds



are intensely developed with limited open space available for new construction. Riverside Park has been considered due to its proximity, size and potential availability. The USCG Academy prepared a FMP in 2006 which includes potential development within a portion of Riverside Park (USCG Academy 2006).

Section 5.0 provides information regarding the potential environmental consequences of Alternative 5.

3.6 Alternatives Considered and Eliminated from Further Study

The USCG considered a variety of alternatives prior to identifying the Parcel 1, Parcel 1A, Parcel 4A and Riverside Park Alternatives. The following provides a brief description of the alternatives that were eliminated from further analysis in this EA, as well as the 2002 EA, and explains why they were found to be unreasonable.

During the preparation of the *Environmental Assessment Land Acquisition for the National Coast Guard Museum* (USCG 2002), dated March 2002, twenty-eight alternatives were evaluated by the USCG, as recommended by the public, as well as Federal and state agencies. In the early stages of the EA process, the USCG held two public information-gathering meetings, to gather input regarding the proposed new National Coast Guard Museum. In addition, the Draft EA was publicly released on 21 November 2001 for a 45-day public comment period, and extended an additional 30 days. Twenty-five alternative site locations were eliminated from further study (USCG 2002).

The alternatives that were eliminated from further study, in this EA, did not meet one or more of the primary site selection criteria presented in **Section 3.0**. Therefore, these alternatives failed to meet the purpose and need discussed in **Section 1.2**. A total of 12 locations were examined in this EA, utilizing a series of applicable environmental and operational criteria in order to discern the optimal facility location, eight of which were eliminated from further consideration (USCG 2002), including:

- Staten Island, New York
- Expansion of the current USCG Museum, located at the USCG Academy in New London, Connecticut
- U.S. Customs House in New London, Connecticut
- Mystic Aquarium Area in Mystic, Connecticut
- East Lyme, Connecticut (Cove Area)
- East Lyme, Connecticut (Interstate [I]-95).
- A virtual museum

Table 3-1 provides a comparative evaluation, displaying the preliminary screening criteria used to identify reasonable alternatives.



**Table 3-1:
Comparison of Alternatives Evaluated**

Alternatives Considered	Selection Criteria			
	Property Specifications (size) ¹	Funding Factors (cost) ²	Educational Link to USCG Academy (proximity) ³	Adherence to 14 USC §98 ⁴
Parcel 1: Fort Trumbull (Alternative 1)	✓	✓	✓	✓
Parcel 1A: Fort Trumbull (Alternative 2)	✓	✓	✓	✓
Parcel 4A: Fort Trumbull (Alternative 3)	○	●	✓	✓
Riverside Park (Alternative 4)	○	○	✓	✓
Continued operation of the current USCG Museum at the USCG Academy (No Action Alternative)	●	✓	✓	✓
Staten Island, New York	○	○	✗	✗
Expansion of the current USCG Museum at the USCG Academy	✗	●	✓	✓
U.S. Customs House	○	✗	○	✓
Mystic Aquarium Area	○	✗	○	✗
East Lyme (Cove Area)	○	✗	○	✗
East Lyme (I-95)	○	✗	○	✗
Virtual museum	✗	✓	✗	✗

Key:

✓ = Strong Advantage; ○ = Moderate Advantage; ✗ = Strong Negative Aspect; ● = Moderate/Minor Negative Aspect

Notes:

¹ Specifications include: space for a 60,000 square foot facility; space for exterior exhibits; potential for expansion; environmentally clean; fee simple title; ready to move in or ready to build upon; zoning classifications with unrestricted building parameters.

² Funding factors include: cost of land acquisition; cost of site demolition and clearing; cost of infrastructure installation; and potential for non-Federal funding.

³ Educational link to the USCG Academy includes a close proximity to provide services that enhance the professional growth and development for current and future generations of Cadets and leadership students.

⁴ Adherence to 14 USC §98 includes lands that will be federally owned and lands located in New London, Connecticut.



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4.0 AFFECTED ENVIRONMENT

4.1 General Overview

This section summarizes current baseline environmental, cultural, and socioeconomic conditions in New London, Connecticut, with emphasis on those resources potentially impacted by the Proposed Action and its alternatives. Within this section, the affected environment is described for the following areas:

- Parcel 1: Fort Trumbull Area, New London, Connecticut (Alternative 1)
- Parcel 1A: Fort Trumbull Area, New London, Connecticut (Alternative 2)
- Parcel 4A: Fort Trumbull Area, New London, Connecticut (Alternative 3)
- Riverside Park, New London, Connecticut (Alternative 4)
- USCG Academy, New London, Connecticut (Alternative 5 – No Action Alternative).

Preparation of this section has relied heavily on the *Final Environmental Assessment for Land Acquisition for the National Coast Guard Museum*, dated March 2002 (USCG 2002), as well as the *Environmental Impact Evaluation: Fort Trumbull MDP Area*, dated 10 November 1998 (Milone & MacBroom et al. 1998). Information presented in the documents has been updated with current data, for information regarding the Fort Trumbull Area, Riverside Park and the USCG Academy.

The project study area is located along the Thames River in the City of New London, New London County, Connecticut, in the southeast part of the State. New London, Connecticut is approximately 130 miles east of New York City, New York, 105 miles southwest of Boston, Massachusetts, and 50 miles southeast of Hartford, Connecticut. The general location of the project study area, which encompasses the five alternative locations, is presented in **Figure 4-1**.

4.1.1 Previous Planning Documents

The following presents the various documents and studies that have been prepared for the five alternative site locations, as identified in the general subsections below.

Fort Trumbull

- In November 1998, Milone & MacBroom *et. al.* conducted a *Draft Environmental Impact Evaluation of the Fort Trumbull MDP Area*. The evaluation was performed in order to determine whether the Fort Trumbull area would benefit by redevelopment of a part or the entire area. Parcel 1 (including Parcel 1A), and Parcel 4A were included in the assessment of the area. It was determined by Milone & MacBroom *et. al.* that any redevelopment in the Fort Trumbull area would result in no significant, unmitigable, long-term, negative impacts. Many of the impacts determined likely to occur through redevelopment were concluded to be a positive impact to the City of New London.
- In November 1999, NLDC, in association with the Connecticut Department of DECD, undertook a municipal development planning project in the Fort Trumbull area. NLDC serves as an agent for the City of New London in the implementation of the MDP. The



New London City Council gave authority to NLDC to prepare the MDP for the Fort Trumbull area in a resolution passed in May 1998 (NLDC 2000). The MDP was approved by the Southeastern Council of Governments, the New London City Council, and the State of Connecticut. The plan calls for acquisition of designated properties, development of new streets and infrastructure and preparation of parcels for future development and for disposition for future development. The goals of the MDP in the Fort Trumbull area is to create an economic asset for the City of New London that will create jobs, generate tax revenue, and result in spin-off economic activity. The plan includes the conversion of approximately 45 acres of blighted and underutilized land to an attractive new site for the Fort Trumbull State Park, an R&D Center, a hotel and conference center, residential areas, and a museum. The MDP was initially divided the area into seven parcels, but did not specify the exact plans for development, except for Parcel 1 (the hotel and conference center). Several minor modifications have been approved for the MDP since its release in August 1999 (NLDC 2000).

- In February 2000, the USCG prepared the *National Coast Guard Museum Planning Proposal*. The purpose of the proposal was for the new National Museum to gain approval from the USCG for the acquisition of land in the Fort Trumbull area of New London, Connecticut, and for the private construction of a new National Museum. The Proposal examined Parcel 4A within the Fort Trumbull. The majority of the information presented in the analysis is relative to the Fort Trumbull area. According to the Proposal, several of the impacts discussed were considered to be a positive impact in the Fort Trumbull area and the City of New London (CEU Providence 2000).
- In 2001, Wilbur Smith Associates prepared the *Traffic Impact Study Fort Trumbull Municipal Development Plan (MDP) New London, Connecticut*. The traffic study was conducted in order to determine the impact of the *Fort Trumbull MDP* project on the roadway system and the critical intersections within the Fort Trumbull area and the surrounding community. The traffic study concluded that the *Fort Trumbull MDP* project would not generate significant impacts during peak-hour traffic. Additionally, the study specifies that the roadway system, with both the improvements suggested and under construction, would assist in maintaining an acceptable level of traffic volume during the operation of the *Fort Trumbull MDP* project, which includes a proposed museum (Wilbur Smith 2001).
- In March 2002, the USCG completed a *Final EA for the Land Acquisition for the National Coast Guard Museum*. The study area for the Final EA included the Fort Trumbull area. It was determined that the Preferred Alternative (Parcel 4A) would result in no significant, unmitigable, long-term, negative impacts; all potential impacts identified in the Final EA are able to be mitigated to less-than-significant levels (USCG 2002).

Riverside Park

- In November 1999, FMA Partnership, P.C. developed the *Final Draft Park and Recreation Masterplan New London, Connecticut* for the City of New London Parks and Recreation Department. The plan was developed in order to evaluate the existing conditions of Riverside Park. During the assessment it was determined that Riverside Park was viewed by local residents as “uninviting” and in “poor condition” (FMA 1999). Furthermore, the plan determined that Riverside Park would benefit from



improvements to the existing structures and roads, as well as by the establishment of new facilities by interested groups. No other potential impacts were discussed in the *Final Draft Park and Recreation Masterplan New London, Connecticut* (FMA 1999).

- In March 2002, the USCG performed the *Final Environmental Assessment Land Acquisition for the National Coast Guard Museum*. The study area for the Final EA included Riverside Park as a potential alternative. It was determined that the Riverside Park Alternative would result in no significant, unmitigable, long-term, negative impacts; all potential impacts identified in the Final EA are able to be mitigated to less-than-significant levels (USCG 2002).

USCG Academy

- In March 2002, the USCG performed the *Final Environmental Assessment Land Acquisition for the National Coast Guard Museum*. The study area for the Final EA included the No Action Alternative (Existing USCG Museum in Waesche Hall). It was determined that the No Action Alternative would result in no significant, unmitigable, long-term, negative impacts. All potential impacts identified in the Final EA are able to be mitigated to less-than-significant levels. However, the Final EA also concluded that the No Action Alternative would result in negative impacts to the mission and goals of the USCG Museum (USCG 2002).
- In December 2006, the USCG Academy prepared the *United States Coast Guard Academy Facilities Master Plan*, which reflects existing and long-term facility needs. The FMP was prepared to address the strategic imperatives of the USCG and the long-term needs of the Academy. The intent of the FMP is to provide the framework for the next round of development, identify appropriate development projects, and serve as a basis for decision-making and other resource related requests (USCG Academy 2006).

4.1.2 Parcel 1: Fort Trumbull Area

Parcel 1 of the Fort Trumbull area is composed of previously developed land adjacent to Fort Trumbull State Park. The parcel is part of the former NUWC property, which was closed in 1996, as well as, a former oil terminal and former Amtrak maintenance right-of-way. The NUWC property consisted of 32 acres along the Thames River, opposite of Smith and East Streets. The Parcel 1 comprises approximately 9.5 acres of previously cleared, filled area.

Parcel 1 has direct waterfront, as well as unobstructed water views across the Fort Trumbull Riverwalk, a 1.7 acre linear park owned by the City of New London. This walkway provides public access along the waterfront of the Fort Trumbull area, and connects with Fort Trumbull State Park, a 16-acre state park.

Parcel 1 has been remediated, and significant site grading has taken place to prepare the site for future development. All new underground infrastructure has been installed and road improvements have been completed.

Parcel 1 is bordered by the Thames River and portions of the Fort Trumbull Riverwalk to the north and east, Parcel 3A to the south (proposed location of the USCG R&D center), and



Amtrak rail lines to the west. Parcel 1 consists of generally flat topography, with a slight slope towards the Thames River.

4.1.3 Parcel 1A: Fort Trumbull Area

Parcel 1A of the Fort Trumbull area is composed of previously developed land in close proximity to Fort Trumbull State Park and is comprised of the eastern portion of Parcel 1 (described above in **Section 4.1.2**). Parcel 1A was formerly part of the NUWC property, which closed in 1996. Parcel 1A encompasses approximately 2.5 acres of previously cleared, filled area.

Parcel 1A does not have direct waterfront, but has unobstructed water views across the Fort Trumbull Riverwalk, a 1.7 acre linear park owned by the City of New London. This walkway provides public access along the waterfront of the Fort Trumbull area, and connects with Fort Trumbull State Park, a 16-acre state park. Parcel 1 is currently owned and managed by NLDC.

Parcel 1 has been remediated, and significant site grading has taken place to prepare the site for future development. All new underground infrastructure has been installed and road improvements have been completed.

Parcel 1A is bordered by the Fort Trumbull Riverwalk and the Thames River to the east, Parcel 3A to the south (the proposed location of the USCG R&D center), Parcel 1B to the west and the north. Parcel 1A consists of generally flat topography, with a slight slope towards the Thames River.

4.1.4 Parcel 4A: Fort Trumbull Area

Parcel 4A was the former location of several single and multi family dwellings. The City of New London authorized NLDC to purchase these properties in the Fort Trumbull area. The City of New London chose to exercise its power of eminent domain over property owners who did not wish to sell. Parcel 4A was previously involved in the eminent domain proceedings of the *Susette Kelo, et al. v. City of New London* case. On 23 June 2005, the Supreme Court of the United States held the decision that the general benefits a community enjoyed from economic growth qualified such redevelopment plans as a permissible "public use" under the Takings Clause of the Fifth Amendment (refer to 545 U.S. 469) (refer to **Section 1.1.2**).

Parcel 4A does not have direct waterfront, but due to elevation has water views that extend to the south. The site is located adjacent to the Fort Trumbull State Park, a 16-acre state park with a restored nineteenth century granite masonry fort and museum/visitors center, which has a waterfront walkway along the Thames River.

Parcel 4A is currently owned and managed by NLDC. The site presently contains nine buildings that require demolition prior to any development. Infrastructure at the site has not been installed, nor have the street improvements, as prescribed in the *Fort Trumbull MDP*. A Phase I Environmental Site Assessment has been performed and indicated that no serious issues beyond the presence of widespread urban fill, which is expected to have contaminants exceeding the State of Connecticut Direct Exposure Criteria. A Phase II Environmental Site Assessment is required at the site, prior to any development activities.

AMEC personnel visited Parcel 4A on 11 October 2007 to validate the information presented in the 2002 *Final Environmental Assessment Land Acquisition for the National Coast Guard*



Museum. At present, the conditions at Parcel 4A are similar to the 2002 Final Environmental Assessment with the exception of the NLDC ownership of the entire parcel and several of the residential structures have since been demolished.

Parcel 4A is comprised of approximately 2.4 acres and is bordered by East Street and the Fort Trumbull State Park to the east, Trumbull Street, commercial buildings and Bentley Cove to the south, Smith Street and the Regional Water Pollution Control Facility to the west, and Walbach Street to the north. Parcel 4A has varied topography that slopes to the east toward the Thames River.

4.1.5 Riverside Park

Riverside Park is owned by the City of New London, and managed by the Parks and Recreation Department. According to the 1999 *Final Draft Parks and Recreation Masterplan New London, Connecticut*, the site is in "poor condition" and in need of extensive repair and upgrade (FMA 1999). Erosion and bare spots are noted along the edge of roads, paved areas, play areas, and turf areas. Maintenance of the waterfront portion of the park is characterized as "very difficult." Maintenance vehicles cannot reach the waterfront and the riverfront beach area is characterized as being in "poor condition," with debris and a stone riprap retaining wall making water access difficult (FMA 1999).

Riverside Park does not have direct waterfront, and presently has slight views of the Thames River. Riverside Park is located within a residential area of the City of New London. The infrastructure in Riverside Park, and the surrounding area, is typical of a residential area.

AMEC personnel visited Riverside Park on 28 September 2006 and 11 October 2007 to validate the information presented in the 1999 Parks and Recreation Masterplan. At present, conditions at Riverside Park are the same as described in the 1999 Parks and Recreation Masterplan.

Riverside Park is bordered by the New England Central Railroad rail lines and the Thames River to the east, Adelaide Street and private residences to the south, private residences to the west, and the USCG Academy to the north. Riverside Park has varied topography that generally slopes toward the Thames River.

4.1.6 USCG Academy

The existing USCG Museum is located in the USCG Academy Library (Waesche Hall) at the northwest corner of the Academy grounds. The topography of the Academy grounds varies from essentially level to steeply sloping. It is extensively landscaped, developed, and maintained with topography and soils that are stabilized by grass lawns, parade grounds, athletic fields, and developed areas. The buildings, streets, and parking areas are extensively tree lined. The athletic grounds are adjacent to the Thames River.

The USCG Academy is bordered by the Thames River to the east, Riverside Park and private residences to the south, Mohegan Avenue to the west and private residences to the north.

4.2 Land Use

Development in southeastern Connecticut is concentrated primarily along the coastline of Long Island Sound and along the Thames River. Single and multi-family residential areas,



commercial establishments, and open space areas generally occur inland of the densely developed coastline.

The downtown area of the City of New London, along the western bank of the Thames River, supports commercial uses and major transportation uses, including ferry services, passenger rail, and a major parking facility. Further north in the City of New London are the State Pier, the Goldstar Memorial bridge, Connecticut College and the USCG Academy.

Major land uses on the eastern bank of the Thames River include the City of Groton, General Dynamics Electric Boat facility, Pfizer Pharmaceutical Company and Fort Griswold.

4.2.1 Regulatory Framework

The City of New London, Office of Development and Planning is responsible for administering and enforcing the City's zoning regulations, subdivision regulations and the coastal management program.

4.2.2 Parcel 1: Fort Trumbull Area

A variety of land uses are present in the vicinity of Parcel 1 of the Fort Trumbull Area, including waterfront uses dominated by harbors and marinas, commercial uses, and mixed office/commercial and residential areas. Land use in the Fort Trumbull Area is characteristic of the region, consisting primarily of waterfront and commercial/industrial development. Specifically, land use within the Fort Trumbull Area includes the regional Wastewater Treatment Facility, Pfizer Pharmaceutical Company office complex, New London Seafood Distributors and marinas, commercial piers, Fort Trumbull State Park, Fort Trumbull Riverwalk and Amtrak rail lines.

In accordance with the *Fort Trumbull MDP* plan, Parcel 1 is designated to support a variety of uses, including: a high-quality conference hotel, meeting space, restaurants, retail shops, parking, and a marina for the general public. The marina area shall offer a variety of water dependent uses for the public, including: boat rentals, boating lessons, and fishing opportunities.

Land Cover

Parcel 1 is a previously disturbed, cleared area, with little or no vegetation. According to NLDC representatives and the Connecticut Department of Environmental Protection (CTDEP), approximately 4 ft of clean fill was placed on the site.

Aesthetics and Visual Resources

Parcel 1 is located on the bank of the Thames River. Aesthetics are representative of waterfront development, consisting of commercial piers, marinas, and the Fort Trumbull Riverwalk, in addition to Fort Trumbull State Park, the regional Wastewater Treatment Facility, and office buildings. Views from Parcel 1 include downtown New London, the Fort Trumbull area, the Thames River, Groton and Fort Griswold. Photographs of Parcel 1 and the vicinity are included in **Appendix I**.



Building Function and Architecture

No structures are currently located within Parcel 1.

Local Zoning

Parcel 1 is located within the City of New London, New London County, Connecticut. Parcel 1 is designated *Commercial, Industrial & Pavement*.

Property Status

Parcel 1 is currently owned by the NLDC. According to the *Fort Trumbull MDP*, Parcel 1 is split into two parcels (refer to Resolution 060427-2). Currently, it is proposed that the hotel and conference center would be located on the smaller northerly portion of Parcel 1 (Parcel 1B).

4.2.3 Parcel 1A: Fort Trumbull Area

Land uses present in the vicinity of Parcel 1A of the Fort Trumbull Area are identical to those found in Parcel 1 (refer to **Section 4.2.2**).

Land Cover

Parcel 1A is a previously disturbed, cleared area, with little or no vegetation. According to NLDC representatives and the CTDEP, approximately 4 ft of clean fill was placed on the site.

Aesthetics and Visual Resources

Parcel 1A is located near the bank of the Thames River. Aesthetics are identical to those found at Parcel 1 (refer to **Section 4.2.2**). Views from Parcel 1A include downtown New London, the Fort Trumbull area, the Thames River, Groton and Fort Griswold. Photographs of Parcel 1A and the surrounding area are included in **Appendix I**.

Building Function and Architecture

No structures are currently located within Parcel 1A.

Local Zoning

Parcel 1A is located within the City of New London, New London County, Connecticut. Parcel 1A is designated *Commercial, Industrial & Pavement*.

Property Status

Parcel 1A is currently owned by the NLDC. According to the *Fort Trumbull MDP*, Parcel 1A is the proposed location of a museum (refer to Resolution 060427-2). The USCG has not agreed to the Parcel 1A location, but is considering the parcel in this EA, in accordance with NEPA (42 USC 4321 *et seq.*).



4.2.4 Parcel 4A: Fort Trumbull Area

A variety of land uses are present in the vicinity of Parcel 4A of the Fort Trumbull Area, including waterfront uses dominated by harbors and marinas, commercial uses, and mixed office/commercial and residential areas. Land use in the Fort Trumbull Area is characteristic of the region, consisting primarily of waterfront and commercial/industrial development. Specifically, land use within the Fort Trumbull Area includes the regional Wastewater Treatment Facility, Pfizer Pharmaceutical Company office complex, New London Seafood Distributors and marinas, commercial piers, Fort Trumbull State Park, and Amtrak rail lines.

In accordance with the *Fort Trumbull MDP*, Parcel 4A is designated to support the marina and Fort Trumbull State Park, providing parking and possibly retail that will serve park visitors and members of the community.

Land Cover

Parcel 4A currently includes previously disturbed and cleared areas, some areas of vegetation, and there are several residential buildings located on the northern half of the parcel.

Aesthetics and Visual Resources

Parcel 4A is located near the bank of the Thames River, adjacent to Fort Trumbull State Park. Aesthetics are representative of waterfront development, consisting of commercial piers, marinas, and the Fort Trumbull Riverwalk, in addition to, the regional Wastewater Treatment Facility, and office buildings. Views from Parcel 4A include downtown New London, the Fort Trumbull area, the Thames River, Groton and Fort Griswold. Photographs of Parcel 4A and the surrounding area are included in **Appendix I**.

Building Function and Architecture

Approximately nine residential buildings are currently located within Parcel 4A. In accompaniment to the residential buildings are yards, alleys, driveways, sidewalks, as well as other features remaining on the site (USCG 2002).

Local Zoning

Parcel 4A is located within the City of New London, New London County, Connecticut. Parcel 4A is designated *Marine Commercial*.

Property Status

Parcel 4A is currently owned by the NLDC. According to the *Fort Trumbull MDP*, Parcel 4A is the proposed as marina and [Fort Trumbull State] Park support (refer to Resolution 060427-2).

4.2.5 Riverside Park

Riverside Park is a designated recreational area, consisting of athletic fields, a basketball court, play equipment, a pavilion, parking lots, picnicking areas, and a riverfront beach. The park is considered by local residents to be in poor condition and is viewed as uninviting (FMA 1999). AMEC personnel visited Riverside Park on 28 September 2006 to validate the information



presented in the 1999 Parks and Recreation Masterplan. At present, conditions at Riverside Park are the same as described in the 1999 Parks and Recreation Masterplan.

Land Cover

Riverside Park primarily consists of wooded areas, with open spaces for athletic and recreational uses.

Aesthetics and Visual Resources

Riverside Park is bordered on the east by the Thames River; however, the New England Central Railroad tracks are located along the water's edge. This detracts from the natural viewscape. Overall, Riverside Park is characterized as uninviting. The waterfront and riverfront beach area is also characterized as being in poor condition with debris and a stone riprap retaining wall distracting from the view (FMA 1999). Views from Riverside Park include portions of the USCG Academy and New London, Thames River and Groton, Connecticut. Photographs of Riverside Park and the surrounding area are included in **Appendix I**.

Building Function and Architecture

Riverside Park contains a restroom facility and a pavilion. The restroom facility has been closed and is not available to the public (FMA 1999).

Local Zoning

Riverside Park is located within the City of New London, New London County, Connecticut. Riverside Park is designated *Deciduous Forest*.

Property Status

Riverside Park is currently owned by the City of New London. It is managed by the city's Parks and Recreation Department.

4.2.6 USCG Academy

The USCG Academy is a Federal Military Academy that provides education to future officers of the USCG, and consists of administrative and educational buildings, athletic facilities, a bookstore, a medical clinic and maintained areas.

Land Cover

The USCG Academy is dominated by manmade structures (i.e., parking lots, buildings), interspersed with maintained fields and landscaped areas.

Aesthetics and Visual Resources

The USCG Academy is located on 128-acres on the banks of the Thames River, with views of the river and USCG vessels in port (i.e., Patrol Boats and Training Ships). The USCG Academy contains white-columned red brick and modern halls, monuments to history, landscaped grounds rolling hills and open spaces. Photographs of the USCG Academy are not included due to security issues.



Building Function and Architecture

The USCG Academy has buildings exhibiting a variety of architectural styles from colonial revival to modern, equipped with state-of-the-art technology. Campus buildings house facilities for either education or administration. The USCG Academy contains five administration buildings and seven educational buildings.

Local Zoning

The USCG Academy and associated grounds are designated *Residential & Commercial*.

Property Status

The USCG Academy is a USCG-owned and operated military academy.

4.3 Air Quality

4.3.1 Regulatory Framework

The U.S. Environmental Protection Agency (USEPA) is the overall regulatory agency for air quality throughout the U.S. The primary regulatory authority for air quality in Connecticut is the CTDEP, Bureau of Air Management. Applicable regulations are set forth in the Regulations of Connecticut State Agencies (RCSA), Title 22a, Section 22a-174-1 to 22a-174-200, Abatement of Air Pollution. CTDEP regulates industrial and commercial sources of air pollution that are required to comply with appropriate Federal, state, and local rules governing air emissions.

Federal air quality regulations are provided in the Clean Air Act (CAA) of 1970 and the Clean Air Act Amendments (CAAA) of 1990. These regulations provide a comprehensive national program with the collective goal of reducing pollutant levels in the ambient air. Title I of the CAAA requires air pollution source owners located in ozone non-attainment areas (see **Section 4.3.3**) to submit an emission statement to local or state regulatory authorities (see **Section 4.3.4**). The emission statement should identify and quantify air emissions of sulfur oxides (SO_x), nitrogen oxides (NO_x), and volatile organic compounds (VOCs) from stationary sources.

4.3.2 Ambient Air Quality

Ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The CAAA requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for six principal pollutants, called criteria pollutants (as listed under Section 108 of the CAA), including the following:

- Carbon monoxide (CO)
- Lead (Pb)
- NO_x
- Ozone (O₃)
- Particulate matter (PM), divided into two size classes:
 - Aerodynamic size less than or equal to 10 micrometers (PM₁₀)
 - Aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5}).



- Sulfur dioxide (SO₂).

Each state and locality has the primary responsibility for air pollution prevention and control. The State and Federal primary and secondary ambient air standards are presented in **Appendix E**. Under the CAA and CAAA, state and local air pollution control agencies have the authority to adopt and enforce ambient air quality standards more stringent than the NAAQS. The CAA requires that each state submit a State Implementation Plan (SIP), which describes how the state would attain and maintain NAAQS in non-attainment areas. The State of Connecticut has developed a USEPA approved SIP (see **Appendix E**).

4.3.3 Criteria for Attainment/Non-Attainment Areas

Per 40 CFR 50.9(b), on 15 June 2005 the 1-hour ozone standard was revoked for all areas except the 8-hour ozone non-attainment Early Action Compact (EAC) Areas; the 1-hour ozone standard was revoked for the State of Connecticut. Currently, New London County does not meet the NAAQS for ozone and is classified as a moderate non-attainment area (ozone 8-hour average concentration is 0.095 ppm). New London County is in attainment for all other criteria pollutants (CO, NO_x, PM₁₀, PM_{2.5}, SO₂, and Pb) (USEPA 2005a).

4.3.4 General Conformity Rule

The General Conformity Provision of the CAA (42 USC 7401 *et seq.*; 40 CFR 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR 51, Subpart W), requires Federal agencies to prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas (see **Section 4.3.3**). Since New London County and the Greater Connecticut area are currently in non-attainment status for ozone, the procedural requirements of the General Conformity Rule are in effect for the Proposed Action (refer to **Appendix E**) (USEPA 2005a).

4.3.5 Local Meteorological Conditions

Local meteorological conditions in the New London, Connecticut area may be conducive to transporting airborne pollutants to adjacent properties and sensitive receptors (i.e., schools, nursing homes, child care centers, churches, private residences) near the project study areas (Connecticut State Climate Center 2006).

Connecticut has a generally temperate climate, with mild winters and warm summers. The January mean temperature is 27 degrees Fahrenheit (°F) (–3 degrees Celsius [°C]) and the July mean is 70°F (21°C). Coastal areas have warmer winters and cooler summers than the interior. Connecticut lies in the “prevailing westerly,” the belt of generally eastward air movement which encircles the globe in the middle latitudes. A large number of storm centers and air-mass fronts pass over Connecticut during a year. Precipitation tends to be evenly distributed throughout the year in Connecticut; prolonged droughts and widespread floods are infrequent (Connecticut State Climate Center 2006).

4.3.6 Parcel 1: Fort Trumbull Area

Existing Emissions Sources

Parcel 1 does not currently support any activities that represent permitted emission sources.



Existing Air Pollution Source Permits

The absence of land use activities generating emissions means that Parcel 1 does not currently possess any air pollution source permits.

Proximate Sensitive Receptors

Sensitive receptors within 1-mile of Parcel 1 include schools, nursing homes, child care centers, churches, and private residences.

4.3.7 Parcel 1A: Fort Trumbull Area

Existing Emissions Sources

Parcel 1 does not currently support any activities that represent permitted emission sources.

Existing Air Pollution Source Permits

The absence of land use activities generating emissions means that Parcel 1 does not currently possess any air pollution source permits.

Proximate Sensitive Receptors

Sensitive receptors within 1-mile of Parcel 1 include schools, nursing homes, child care centers, churches, and private residences.

4.3.8 Parcel 4A: Fort Trumbull Area

Existing Emissions Sources

Parcel 4A does not currently support any activities that represent permitted emission sources.

Existing Air Pollution Source Permits

The absence of land use activities generating emissions means that Parcel 4A does not currently possess any air pollution source permits.

Proximate Sensitive Receptors

Sensitive receptors within 1-mile of Parcel 4A include schools, nursing homes, child care centers, churches, and private residences.

4.3.9 Riverside Park

Existing Emissions Sources

Riverside Park does not currently support any land use activities that comprise permitted emission sources.



Existing Air Pollution Source Permits

Riverside Park does not currently possess any air pollution source permit due to a lack of activities that would require such permits.

Proximate Sensitive Receptors

Sensitive receptors within 1-mile of Riverside Park include child care centers, churches, schools, nursing homes, and private residences.

4.3.10 USCG Academy

Existing Emissions Sources

The USCG Academy possesses permitted emission sources. However, Waesche Hall does not currently support any activities that represent permitted emission sources.

Existing Air Pollution Source Permits

The USCG Academy maintains a Title V Air Permit to cover all major and minor air emission sources throughout its campus. These sources include boilers, generators, and aboveground storage tanks (ASTs). Waesche Hall does not support any activities that comprise major or minor air emission sources.

Proximate Sensitive Receptors

Sensitive receptors within 1-mile of the USCG Academy include schools, nursing homes, child care centers, churches, and private residences.

4.4 Noise

4.4.1 Regulatory Framework

Under NEPA, the Noise Control Act of 1972 (42 USC 4903, (Public Law [P.L.] 92-574) and EO 12088, Federal Compliance with Pollution Control Standards, the USCG is required to assess the environmental impact of noise produced by their activities. Within such an assessment land use strategies are promulgated to establish proper planning criteria that protect on- and off-site receptors from environmental noise.

In addition, the City of New London, Office of Development and Planning, enforces a noise ordinance providing for the control of noise pollution within the City of New London. Per Connecticut General Statutes (CGS) Chapter 442, §22a-67, *et seq.*, the City of New London is authorized as a municipality to regulate noise by local ordinance.

The noise environment within the City of New London includes the effects of non-impulse noise. Non-impulse noise is generated from continuous, low-energy noise sources, such as privately-owned vehicles (POVs). The unit of measure for non-impulse noise is A-weighted in decibels (dBA) over a 24-hour day-night level (L_{dn}). Federal agencies generally agree that an L_{dn} below 65 dBA (Zone I) is compatible with residences, nursing homes, schools, and similar land use types. An L_{dn} above 75 dBA (Zone III) is generally considered unacceptable for these land



uses. Between 65 dBA and 75 dBA (Zone II), noise attenuation measures are recommended in the design and construction of public and quasi-public service buildings.

The U.S. Department of Housing and Urban Development (HUD) has developed site acceptability standards for determining the acceptable levels of noise for federally assisted projects. These are designed to ensure a suitable living environment (24 CFR Part 51 - *Environmental Criteria and Standards*). **Table 4-1** summarizes HUD Noise Zone Classifications.

**TABLE 4-1:
Noise Zone Classification**

Noise Zone	Description	Day/Night Sound Level (L _{dn})
I	Acceptable	Not exceeding 65 dBA
II	Normally Unacceptable	Above 65 dB but not exceeding 75 dBA
III	Unacceptable	Above 75 dBA

Source: HUD 2006.

The City of New London has adopted a zoning ordinance for the purpose of noise control that provides the noise limit for different land uses in order to protect neighboring properties and the general public from potential noise-generating activities. These local noise codes would be applicable for various on-site stationary noise sources, such as construction activities. The City of New London performance standards for noise control in residential areas do not apply to noise generated by vehicular traffic (City of New London 2005).

4.4.2 Parcel 1: Fort Trumbull Area

The noise environment at Parcel 1 generally lies within the HUD “acceptable” noise zone. In addition, it is located within a Class B Noise Zone, defined by State of Connecticut as an area involving commercial and recreational activities. Due to its proximity to Amtrak rail lines and the Thames River, short-term (i.e., episodic) transportation noise occurs. However, on average, noise levels at Parcel 1 are representative of acceptable levels within the City of New London (USCG 2002).

Various sensitive receptors are located within 1-mile of Parcel 1 (see **Section 4.3.6**).

4.4.3 Parcel 1A: Fort Trumbull Area

The noise environment at Parcel 1A is identical to the noise environment found at Parcel 1 (see **Section 4.4.2**).

Various sensitive receptors are located within 1-mile of Parcel 1A (see **Section 4.3.7**).

4.4.4 Parcel 4A: Fort Trumbull Area

The noise environment at Parcel 1A is identical to the noise environment found at Parcel 1 (see **Section 4.4.2**).



Various sensitive receptors are located within 1-mile of Parcel 4A (see **Section 4.3.8**).

4.4.5 Riverside Park

The noise environment at Riverside Park is typical of recreation facilities in an urban residential setting and is within the HUD “acceptable” noise zone. Further, it is located within the State of Connecticut Class B Noise Zone. Due to its close proximity to I-95 and New England Central Railroad rail lines, background vehicular and rail traffic noise can be detected. However, on average, noise levels at Riverside Park are representative of acceptable levels within the City of New London (USCG 2002).

Various sensitive receptors are located within 1-mile of Riverside Park (see **Section 4.3.9**).

4.4.6 USCG Academy

The noise environment at the USCG Academy is within the HUD “acceptable” noise zone. In addition, it is located within the State of Connecticut Class B Noise Zone. Due to its close proximity to I-95, background vehicular traffic noise can be detected during particular conditions. However, on average, noise levels at the USCG Academy are representative of acceptable levels within the City of New London (USCG 2002).

Various sensitive receptors are located within 1 mile of the USCG Academy (see **Section 4.3.10**).

4.5 Geology, Topography, and Soils

Geologic resources in the project area consist of sandy and gravelly till substrate overlaying bedrock, located in the Eastern Highland physiographic section of Connecticut. Glacial till in the area was deposited during the Wisconsin Glacial Stage of the Pleistocene Epoch, approximately 15,000 years ago (Milone & MacBroom *et al.* 1998, USCG 2002). A stratified drift, containing deposits of smaller gravel and sand, can be observed in several areas of New London, including along I-95, Fenger Brook, Alewife Cove and along the Thames River. The major topographic features of the area are elongated hills in a north-south orientation, as another result of the glacier. The most recognizable elongated hill in the area is located in the southern portion of the City of New London, along Ocean Avenue (Milone & MacBroom *et al.* 1998).

4.5.1 Parcel 1: Fort Trumbull Area

4.5.1.1 Geology

The near surface bedrock within Parcel 1 is New London Gneiss (see **Figure 4-2**). New London Gneiss is characterized as massive gray granitic gneiss.

4.5.1.2 Topography

The elevation of Parcel 1 is approximately 30 ft above mean sea level (amsl), with abundant bedrock outcroppings. The area is generally flat with a slight slope toward the Thames River (see **Figure 4-3a**).



4.5.1.3 Soil Types and Characteristics

Parcel 1 is located within an area formed during the Wisconsin Stage of the Pleistocene Epoch. The deposits left during the Wisconsin glaciations and found in Parcel 1 consist of Hollis-Chatfield-Rock outcrop complex and Udorthents-Urban land complex. The Hollis-Chatfield-Rock outcrop complex consists of well drained soils and rock outcrop on glacial till uplands (see **Figure 4-4a**). Approximately 40 percent of this complex is Hollis soil, 25 percent Chatfield soil, 20 percent rock outcrop, and 15 percent other soils (Milone & MacBroom et al. 1998, USCG 2002).

Two soil types are located within Parcel 1 of the Fort Trumbull area:

1. **Hollis-Chatfield-Rock outcrop complex (75C)** is characterized as hilltops or hillsides, 3-15 percent slope, well drained soil.
2. **Udorthents-Urban land complex (306)** is characterized as moderately well-drained to excessively drained soils that have been disturbed and covered by buildings and/or pavement.

Locations of soils found at Parcel 1 are shown in **Figure 4-4a**. Soil characteristics are summarized below in **Table 4-2**.

**TABLE 4-2:
Soil Types Present Within the Parcel 1: Fort Trumbull Area**

Soil Type	Symbol	Slope (%)	Hydric Status	Prime or Unique Farmland
Hollis-Chatfield-Rock outcrop complex	75C	3 -15	No	No
Udorthents-Urban land complex	306	N/A	No	No

Source: USDA 2005.

Notes:

N/A = Data Not Available

4.5.1.4 Prime and Unique Farmlands

None of the soil types within Parcel 1 are designated as prime farmland and/or as farmland of statewide importance (see **Table 4-2** and **Figure 4-4a**).

4.5.1.5 Hydric Soils

According to the U.S. Department of Agriculture (USDA) - Natural Resources Conservation Service (NRCS), and the CTDEP soils maps, none of the soils within the area have been identified as hydric or as having hydric components (USDA 1981).



4.5.2 Parcel 1A: Fort Trumbull Area

4.5.2.1 Geology

The near surface bedrock within Parcel 1A is identical to the surface bedrock at Parcel 1 (refer to **Section 4.5.1.1** and **Figure 4-2**).

4.5.2.2 Topography

The elevation of Parcel 1A is identical to the elevation at Parcel 1 (refer to **Section 4.5.1.2** and **Figure 4-3a**).

4.5.2.3 Soil Types and Characteristics

Soil types found at Parcel 1A consist of Hollis-Chatfield-Rock outcrop complex and Udorthents-Urban land complex; identical to those found within Parcel 1 (see **Section 4.5.1.3**).

Locations of soils found at Parcel 1A are shown in **Figure 4-4a**. Soil characteristics are summarized above in **Table 4-2**.

4.5.2.4 Prime and Unique Farmlands

None of the soil types within Parcel 1 are designated as prime farmland and/or as farmland of statewide importance (see **Table 4-2** and **Figure 4-4a**).

4.5.2.5 Hydric Soils

According to the USDA-NRCS, and the CTDEP soils maps, none of the soils within the area have been identified as hydric or as having hydric components (USDA 1981).

4.5.3 Parcel 4A: Fort Trumbull Area

4.5.3.1 Geology

The near surface bedrock within Parcel 4A is New London Gneiss (see **Figure 4-2**). New London Gneiss is characterized as massive gray granitic gneiss.

4.5.3.2 Topography

The elevation of Parcel 4A is varies from approximately 10 to 30 ft amsl, with abundant bedrock outcroppings and headland. The area slopes toward the Thames River (USCG 2002) (see **Figure 4-3a**).

4.5.3.3 Soil Types and Characteristics

Soil types found at Parcel 4A consist of Hollis-Chatfield-Rock outcrop complex and Udorthents-Urban land complex (see **Section 4.5.1.3**).

Locations of soils found at Parcel 4A are shown in **Figure 4-4a**. Soil characteristics are summarized above in **Table 4-2**.



4.5.3.4 Prime and Unique Farmlands

None of the soil types within Parcel 4A are designated as prime farmland and/or as farmland of statewide importance (see **Table 4-2** and **Figure 4-4a**).

4.5.3.5 Hydric Soils

According to the USDA-NRCS, and the CTDEP soils maps, none of the soils within the area have been identified as hydric or as having hydric components (USDA 1981).

4.5.4 Riverside Park

4.5.4.1 Geology

The near surface bedrock within Riverside Park is Hope Valley Alaskite Gneiss (see **Figure 4-2**). Hope Valley Alaskite Gneiss is characterized as light-pink to gray, medium- to coarse-grained granitic gneiss.

4.5.4.2 Topography

The topography of the Riverside Park area varies with elevation ranging from approximately 10 to 100 ft amsl. In general, the area slopes east toward the Thames River (see **Figure 4-3b**).

4.5.4.3 Soil Types and Characteristics

The Riverside Park area is located in an area formed during the Wisconsin Stage of the Pleistocene Epoch. The deposits left during the Wisconsin glaciations and found in the Riverside Park area consist of Canton and Charlton soils, the Charlton-Chatfield complex, and a small section of Udorthents-Urban land complex. The Charlton-Chatfield complex forms the majority of the Riverside Park area, and contains well drained Charlton and Chatfield soils (see **Figure 4-4b**).

Four soil types are located within the Riverside Park area:

1. **Canton and Charlton soils (60B)** are characterized as a moderately drained soil with 3 to 8 percent slope.
2. **Charlton-Chatfield complex (73C)** is characterized as rolling, rocky and hilly and well-drained with 3 to 15 percent slope.
3. **Charlton-Chatfield complex (73E)** is characterized as rolling, rocky and hilly and well-drained with 15 to 45 percent slope.
4. **Udorthents-Urban land complex (306)** is characterized as moderately well-drained to excessively drained soils that have been disturbed and covered by buildings and/or pavement.

Locations of soils found in the Riverside Park area are provided in **Figure 4-4b** and local soil characteristics are summarized below in **Table 4-4**.



4.5.4.4 Prime and Unique Farmlands

None of the soil types within the Riverside Park area are designated as prime farmland and/or as farmland of statewide importance (see **Table 4-3** and **Figure 4-4b**).

**TABLE 4-4:
Soil Types Present Within the Riverside Park Area**

Soil Type	Symbol	Slope (%)	Hydric Status	Prime or Unique Farmland
Canton and Charlton soils	60B	3 - 8	No	No
Charlton-Chatfield complex	73C	3 - 15	No	No
Charlton-Chatfield complex	73E	15 - 45	No	No
Udorthents-Urban land complex	306	N/A	No	No

Source: USDA 2005.

Notes:

N/A = Data Not Available

4.5.4.5 Hydric Soils

According to the USDA-NRCS, and the CTDEP soils maps, none of the soils within the Riverside Park area have been identified as hydric or as having hydric components (USDA 1981).

4.5.5 USCG Academy

4.5.5.1 Geology

The near surface bedrock within the USCG Academy is Potter Hill Granite Gneiss (see **Figure 4-2**). Potter Hill Granite Gneiss is characterized as light-pink to gray, tan weathering, fine- to medium-grained, well foliated granitic gneiss.

4.5.5.2 Topography

The topography of the USCG Academy varies in elevation, ranging from near-sea level to approximately 130 ft amsl to 160 ft amsl. The elevation at Waesche Hall is approximately 130 ft amsl. The topography is essentially level, gently sloping toward the Thames River (see **Figure 4-3b**).

4.5.5.3 Soil Types and Characteristics

The USCG Academy is located in an area formed during the Wisconsin Stage of the Pleistocene Epoch. The deposits left during the Wisconsin glaciations, found in the area of the USCG Academy, consist of Udorthents-Urban land complex. The Udorthents-Urban land complex forms the majority of the soils found within the USCG Academy area, containing



moderately well-drained to excessively drained soils that have been disturbed and covered by buildings and/or pavement (USCG 2002) (see **Figure 4-4b**).

One soil type is located within the USCG Academy:

1. **Udorthents-Urban land complex (306)** is characterized as moderately well-drained to excessively drained soils that have been disturbed and covered by buildings and/or pavement.

Locations of soils found at the USCG Academy are shown in **Figure 4-4b**. Soil characteristics are summarized below in **Table 4-5**.

**TABLE 4-5:
Soil Types Present Within the USCG Academy**

Soil Type	Symbol	Slope (%)	Hydric Status	Prime or Unique Farmland
Udorthents-Urban land complex	306	N/A	No	No

Source: USDA 2005.

Notes:

N/A = Data Not Available

4.5.5.4 Prime and Unique Farmlands

The soil type within the USCG Academy is not designated as prime farmland and/or as farmland of statewide importance (see **Table 4-5** and **Figure 4-4b**).

4.5.5.5 Hydric Soils

According to the USDA-NRCS, and the CTDEP soils maps, the soil within the USCG Academy has not been identified as hydric or as having hydric components (USDA 1981).

4.6 Water Resources

4.6.1 Regulatory Framework

The Coastal Zone Management Act (CZMA) of 1972 (16 USC 1451-1456) preserves, protects, develops, and where possible, restores and enhances, the resources of the nations coastal zone. The CZMA provides protection for natural resources including wetlands, floodplains, estuaries, beaches, dunes, barrier islands, coral reefs, and fish and wildlife and their habitat, within the coastal zone. The State of Connecticut has developed a Coastal Zone Management Program in accordance with the rules and regulations set forth in the CZMA. The CTDEP, Office of Long Island Sound Programs (OLISP), implements, oversees, and enforces the State's coastal management and coastal permit laws and regulations, manages programs to protect and restore coastal resources and encourage water-dependent uses of the shorefront. The OLISP implements Connecticut's federally-approved coastal zone management program pursuant to the CZMA. The OLISP's Coastal Planning Section is responsible for coastal



planning and policy analysis. Responsibilities include, but are not limited to, monitoring compliance of State and municipal planning and regulatory programs pursuant to CGS sections 22a-97, 22a-98, 22a-100, and 22a-105 through 22a-109 of the Connecticut Coastal Management Act (CCMA) and initiate, as appropriate, enforcement actions for non-compliance. The Connecticut Coastal Management Manual is used a tool used in understanding how to apply the standards and policies of the CCMA.

Additional applicable laws and regulations are presented in **Appendix C**.

4.6.2 Parcel 1: Fort Trumbull Area

4.6.2.1 Coastal Resources

According to the Connecticut Coastal Management Manual, Parcel 1 is a developed shorefront and a shoreland. Parcel 1 is a waterfront property, and lies within the coastal boundary. A developed shorefront is a highly engineered and developed harbor area, generally with bulkheads, seawalls, revetments, or other hard structures. A shoreland is a land area within the coastal boundary not located within coastal flood or erosion hazard areas, and contains no tidal wetlands, beaches and dunes or other sensitive resources. No other coastal resources, as defined in the Connecticut Coastal Management Manual, are present within Parcel 1.

In accordance with the *Fort Trumbull MDP*, Parcel 1 must provide adequate public access and water dependent uses in order to maintain a level of accessibility. The level of water dependent uses, as identified in the *Fort Trumbull MDP* includes, a marina for local residents, Fort Trumbull hotel occupants, and the general public and will provide various opportunities, including boat rentals, boating lessons, and fishing, and thereby adding interest, entertainment, and water-edge activities in the Fort Trumbull area (NLDC 2000).

4.6.2.2 Surface Water Resources

No surface water features exist within the boundary of Parcel 1; however, Parcel 1 is adjacent to the Thames River and is within its watershed (see **Figure 4-5a**).

The majority of Parcel 1 is no longer located within a 100-year floodplain (see **Figure 4-6a**). A small portion of the southwestern corner and small areas along the Thames River remain within the 100-year floodplain. Based on the Letter of Map Revision based on Fill (LOMR-F), approved on 11 July 2005, the Federal Emergency Management Agency (FEMA) determined that the area is not within an identified Special Flood Hazard Area, with the exception of a small portion of the southwestern corner and small portions along the Thames River. To remediate past site activities, interim grading and site restoration activities were performed at Parcel 1 and the surrounding area, which removed Parcel 1 from the Special Flood Hazard Area.

The National Wetland Inventory (NWI) database and map indicates that no wetlands are located within the boundary of Parcel 1. However, wetlands are present east, north and northwest of Parcel 1 along the river (see **Figure 4-7a**).

Parcel 1 slopes downward toward the east, and drains directly into the Thames River; the Thames River flows into the Atlantic Ocean less than 2 miles south of the Fort Trumbull area.



Stormwater runoff within the Fort Trumbull area is collected in the recently installed storm sewers and treated by two separate collection systems designed to treat runoff from the Fort Trumbull area, prior to draining into the Thames River. This system is identified in the *Fort Trumbull MDP* in an effort to minimize the impacts of stormwater, to the Thames River, resulting from the proposed development on the Fort Trumbull area. The stormwater collection system includes gross particle separators, deep sump catch basins with oil-grease traps, and detention/retention basins. Currently, four outfalls to the Thames River are located in the Fort Trumbull area, reduced from the previous 17 (NLDC 2000). One of the four new stormwater collection basins within the Fort Trumbull area is located directly south of Parcel 1, along the northern corner of Chelsea and East Streets (Brooks 2008).

A Stormwater Pollution Control Plan has been implemented for the entire Fort Trumbull area, in an effort to enhance and minimize the effects of the stormwater collection system. Appropriate controls have been installed including structural measures (i.e., raised street curbs) and non-structural measures in an effort to dissipate and treat runoff, such as, vegetated swales (NLDC 2000).

4.6.2.3 Groundwater Resources

Groundwater below the project study area is from the Crystalline-Rock Aquifer formation. Water found in crystalline-rock aquifers is generally suitable for most uses due to the insoluble minerals forming the majority of the rock composition. In addition, groundwater primarily moves through joints and fractures rapidly and along short flow paths (USGS 2005).

Groundwater within the Fort Trumbull area is classified as GB, containing possible degradation, and is not suitable for drinking (CTDEP 2006). AMEC personnel identified several groundwater monitoring wells on 28 September 2006, while performing a site walk. According to the Remedial Investigation/Feasibility Study (RI/FS) prepared in December 2001, groundwater contamination was identified as a result of VOCs and light non-aqueous phase liquids (LNAPL) petroleum (see **Section 4.12.1.5**).

4.6.2.4 Water Providers

No potable water is currently provided to Parcel 1. However, water is provided to the Fort Trumbull area by the City of New London Water District.

4.6.3 Parcel 1A: Fort Trumbull Area

4.6.3.1 Coastal Resources

According to the Connecticut Coastal Management Manual, Parcel 1A is a developed shorefront and a shoreland. Although Parcel 1A is not a waterfront property, it lies within the coastal boundary. A developed shorefront is highly engineered and developed harbor area, generally with bulkheads, seawalls, revetments, or other hard structures. A shoreland is a land area within the coastal boundary not located within coastal flood or erosion hazard areas, and contains no tidal wetlands, beaches and dunes or other sensitive resources. No other coastal resources, as defined in the Connecticut Coastal Management Manual, are present within Parcel 1A.



4.6.3.2 Surface Water Resources

No surface water features exist within the boundary of Parcel 1A; however, Parcel 1A is adjacent to the Thames River and within its watershed (see **Figure 4-5a**).

The vast majority of Parcel 1A is no longer located within a 100-year floodplain (see **Figure 4-6a**). A small portion of the southeastern corner remains within the 100-year floodplain. Based on the Letter of Map Revision based on Fill (LOMR-F), approved on 11 July 2005, the FEMA determined that the area is not within an identified Special Flood Hazard Area, with the exception of a small portion of the southeastern corner. To remediate past site activities, interim grading and site restoration activities were performed at Parcel 1A and the surrounding area, which removed Parcel 1A from the Special Flood Hazard Area.

The NWI database and map indicates that no wetlands are located within the boundary of Parcel 1A. However, wetlands are present east, north and northwest of Parcel 1A along the Thames River (see **Figure 4-7a**).

Parcel 1A slopes downward toward the east, and drains directly into the Thames River; the Thames River flows into the Atlantic Ocean less than 2 miles south of the Fort Trumbull area.

Stormwater runoff within the Fort Trumbull area is collected in the recently installed storm sewers and treated by two separate collection systems designed to treat runoff from the Fort Trumbull area, prior to draining into the Thames River. This system is identified in the *Fort Trumbull MDP* in an effort to minimize the impacts of stormwater, to the Thames River, resulting from the proposed development on the Fort Trumbull area. The stormwater collection system includes gross particle separators, deep sump catch basins with oil-grease traps, and detention/retention basins. Currently, four outfalls to the Thames River are located in the Fort Trumbull area, reduced from previous 17 (NLDC 2000). One of the four new stormwater collection basins within the Fort Trumbull area is located directly south of Parcel 1, along the northern corner of Chelsea and East Streets (Brooks 2008).

A Stormwater Pollution Control Plan has been implemented for the entire Fort Trumbull area, in an effort to enhance and minimize the effects of the stormwater collection system. Appropriate controls have been installed including structural measures (i.e., raised street curbs) and non-structural measures in an effort to dissipate and treat runoff, such as, vegetated swales (NLDC 2000).

4.6.3.3 Groundwater Resources

Groundwater in the project study area is from the Crystalline-Rock Aquifer formation (refer to **Section 4.6.2.3** for a description of crystalline-rock aquifers).

4.6.3.4 Water Providers

No potable water is currently provided to Parcel 1A. However, water is provided to the Fort Trumbull area by the City of New London Water District.



4.6.4 Parcel 4A: Fort Trumbull Area

4.6.4.1 Coastal Resources

According to the Connecticut Coastal Management Manual, Parcel 4A is a developed shorefront and a shoreland. Although Parcel 4A is not a waterfront property, it lies within the coastal boundary. A developed shorefront is highly engineered and developed harbor area, generally with bulkheads, seawalls, revetments, or other hard structures. A shoreland is a land area within the coastal boundary not located within coastal flood or erosion hazard areas, and contains no tidal wetlands, beaches and dunes or other sensitive resources. No other coastal resources, as defined in the Connecticut Coastal Management Manual, are present within Parcel 4A.

4.6.4.2 Surface Water Resources

No surface water features exist within the boundary of Parcel 4A; however, Parcel 4A is adjacent to the Thames River and within its watershed (see **Figure 4-5a**).

The majority of Parcel 4A is not located within a 100-year floodplain; however according to FEMA, the southwest corner of Parcel 4A is located within the 100-year floodplain (see **Figure 4-6a**).

The NWI database and map indicates that no wetlands are located within the boundary of Parcel 4A. However, during site reconnaissance, 11 October, 2007, a potential small freshwater wetland was identified in the southwest corner of Parcel 4A (see **Figure 4-7a**).

Parcel 4A slopes downward toward the east, and drains directly into the Thames River; the Thames River flows into the Atlantic Ocean less than 2 miles south of the Fort Trumbull area.

Stormwater runoff within the Fort Trumbull area is collected in the recently installed storm sewers and treated by two separate collection systems designed to treat runoff from the Fort Trumbull area, prior to draining into the Thames River. This system is identified in the *Fort Trumbull MDP* in an effort to minimize the impacts of stormwater, to the Thames River, resulting from the proposed development on the Fort Trumbull area. The stormwater collection system includes gross particle separators, deep sump catch basins with oil-grease traps, and detention/retention basins. Currently, four outfalls to the Thames River are located in the Fort Trumbull area, reduced from previous 17 (NLDC 2000). In accordance with the *Fort Trumbull MDP*, one of the four proposed stormwater collection outfalls shall be located immediately southwest of Parcel 4A, at the intersection of Smith and Trumbull Streets, and draining into Bentley Creek (Brooks 2008).

A Stormwater Pollution Control Plan has been implemented for the entire Fort Trumbull area, in an effort to enhance and minimize the effects of the stormwater collection system. Appropriate controls have been installed including structural measures (i.e., raised street curbs) and non-structural measures in an effort to dissipate and treat runoff, such as, vegetated swales (NLDC 2000).



4.6.4.3 Groundwater Resources

Groundwater in the project study area is from the Crystalline-Rock Aquifer formation (refer to **Section 4.6.2.3** for a description of crystalline-rock aquifers).

4.6.4.4 Water Providers

No potable water is currently provided to Parcel 4A. However, water is provided to the Fort Trumbull area by the City of New London Water District.

4.6.5 Riverside Park

4.6.5.1 Coastal Resources

According to the Connecticut Coastal Management Manual, the eastern portion of Riverside Park is characterized as a shoreland. A shoreland is a land area within the coastal boundary not located within coastal flood or erosion hazard areas, and contains no tidal wetlands, beaches and dunes or other sensitive resources. No other coastal resources, as defined in the Connecticut Coastal Management Manual, are present within Riverside Park.

4.6.5.2 Surface Water Resources

No surface water features exist within Riverside Park (see **4-5b**). Based on available data obtained from FEMA, Riverside Park is not located within a 100-year floodplain (see **4-6b**). Furthermore, the NWI database and map indicate that no wetlands are located within Riverside Park. Wetlands are present east of the project study area along the Thames River (see **Figure 4-7b**).

Riverside Park slopes downward toward the east, and drains into the Thames River, which flows in a southern direction and empties into the Atlantic Ocean approximately 3 miles south of the park. Riverside Park is within the Thames River watershed (see **Figure 4-5b**).

Stormwater runoff from road and parking surfaces within Riverside Park is collected in area storm sewers and treated by the New London Water and Sewer Authority and the New London Wastewater Treatment Facility.

4.6.5.3 Groundwater Resources

Groundwater in the project study area is from the Crystalline-Rock Aquifer formation (refer to **Section 4.6.2.3** for a description of crystalline-rock aquifers). Groundwater within the Riverside Park area is classified as GB, containing possible degradation, and is not suitable for drinking (CTDEP 2006).

4.6.5.4 Water Providers

Potable water is provided to the Riverside Park area by the City of New London Water District.



4.6.6 USCG Academy

4.6.6.1 Coastal Resources

No coastal resources, as defined in the Connecticut Coastal Management Manual, are present within the vicinity of Waesche Hall.

4.6.6.2 Surface Water Resources

No surface water features exist within the USCG Academy property (see **Figure 4-5b**). Based on data obtained from FEMA, the lower portion of the USCG Academy is located within a 100-year floodplain; however, Waesche Hall is outside of this area (see **Figure 4-6b**). The NWI database and map indicate that wetlands are located along the Thames River within the USCG Academy boundary. However, these wetlands are located more than 1,000 ft east of Waesche Hall (see **Figure 4-7b**).

Terrain at the USCG Academy slopes eastward and drains into the Thames River. The Thames River flows southward and empties into the Atlantic Ocean approximately 3 miles south of the Academy. The USCG Academy is within the Thames River watershed (see **Figure 4-5b**).

Stormwater runoff from impermeable surfaces within the USCG Academy is collected in area storm sewers and is discharged into the Thames River.

4.6.6.3 Groundwater Resources

Groundwater in the project study area is from the Crystalline-Rock Aquifer formation (refer to **Section 4.6.2.3** for a description of crystalline-rock aquifers). Groundwater in the USCG Academy area is classified as GB, containing possible degradation, and is not suitable for drinking (CTDEP 2006).

4.6.6.4 Water Providers

Potable water is provided to the USCG Academy by the City of New London Water District.

4.7 Biological Resources

4.7.1 Regulatory Framework

The Endangered Species Act (ESA) of 1973 (16 USC 1531 *et seq.*) regulates the protection of federally-listed species. Section 7 of the ESA dictates that Federal actions should not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of such species. In addition, the CTDEP, Office of Long Island Sound, regulates the protection of federally and state-listed species within the State of Connecticut.

Additional applicable laws and regulations are presented in **Appendix C**.



4.7.2 Parcel 1: Fort Trumbull Area

4.7.2.1 Local Ecosystems and Communities

Plant Communities

Land in the project study area is previously developed and disturbed (USCG 2002). Parcel 1 has been cleared of vegetation. The parcel contains small areas of greater relief and rock outcrops that may offer microhabitats for particular organisms. No sensitive plant communities have been identified within Parcel 1 (see **Figure 4-8**).

Special Habitat Areas

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. Based on that review, Parcel 1 is not located within a special habitat area (see **Figure 4-8**).

4.7.2.2 Special Status Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps (CTDEP 2008). Based on that review, no special status species are located within Parcel 1 or the vicinity (see **Figure 4-8**).

4.7.3 Parcel 1A: Fort Trumbull Area

4.7.3.1 Local Ecosystems and Communities

Plant Communities

Land in the project study area is previously developed and disturbed (USCG 2002). Parcel 1A contains vegetative communities that are identical to those found in Parcel 1 (refer to **Section 4.7.2.1** and **Figure 4-8**).

Special Habitat Areas

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps (CTDEP 2008). Based on that review, Parcel 1A is not located within a special habitat area (see **Figure 4-8**).

4.7.3.2 Special Status Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. Based on that review, no special status species are located within Parcel 1A or the vicinity (see **Figure 4-8**).



4.7.4 Parcel 4A: Fort Trumbull Area

4.7.4.1 Local Ecosystems and Communities

Plant Communities

Land in the project study area is previously developed and disturbed (USCG 2002). Parcel 4A contains vegetation that is typically found in urban areas; such as lawns and flowerbeds. The parcel contains small areas of greater relief and rock outcrops that may offer microhabitats for particular organisms (USCG 2002). No sensitive plant communities have been identified within Parcel 4A (see **Figure 4-8**).

Special Habitat Areas

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps (CTDEP 2008). Based on that review, Parcel 4A is not located within a special habitat area (see **Figure 4-8**).

4.7.4.2 Special Status Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. Based on that review, no special status species are located within Parcel 4A or the vicinity (see **Figure 4-8**).

The 2002 *Final Environmental Assessment for the Land Acquisition for the National Coast Guard Museum*, mentions a comment made by a public property owner during the 28 June 2001 public meeting regarding the identification of two endangered species. The property owner stated that "a high school teacher identified a salamander found at Parcel 4A as belonging to an unidentified endangered species and an exterminator had informed him that a bat found at his property belonged to an unidentified endangered species" (USCG 2002). However, the 2002 EA also notes that communication with a representative of the CTDEP during and after the 28 June 2001 public meeting indicated that there would not be any likelihood of identifying sensitive wildlife resources at Parcel 4A (USCG 2002). Further, AMEC personnel discussed the potential for special status species on Parcel 4A with CTDEP representatives and concluded that no special status species are located within Parcel 4A.

4.7.5 Riverside Park

4.7.5.1 Local Ecosystems and Communities

Plant Communities

Riverside Park contains woodland and open space areas. The open space is comprised of athletic and recreational facilities, which are managed to eliminate natural vegetation. The woodland areas comprise typical eastern deciduous woodlands, including approximately 12-acres of deciduous tree cover. However, no sensitive vegetative resources have been identified within the Riverside Park area.



Special Habitat Areas

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP “State and Federal Listed Species and Significant Natural Communities” maps (CTDEP 2008). According to the review, Riverside Park is not located within a special habitat area (see **Figure 4-8**).

4.7.5.2 Special Status Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP “State and Federal Listed Species and Significant Natural Communities” maps. According to the review, no special status species are located within the Riverside Park area (see **Figure 4-8**).

4.7.6 USCG Academy

4.7.6.1 Local Ecosystems and Communities

Plant Communities

Vegetation at the USCG Academy is comprised of extensive grass-covered open space, including lawns, parade grounds and athletic fields. These areas are mowed and managed to eliminate other vegetation. The building areas, streets and parking areas are tree-lined with tree species typical of parks and urban settings. Therefore, little natural habitat exists within the USCG Academy, and no sensitive vegetative resources have been identified there.

Special Habitat Areas

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP “State and Federal Listed Species and Significant Natural Communities” maps (CTDEP 2008). According to the review, portions of the USCG Academy are located within a special habitat area; however, Waesche Hall is not located within this area (see **Figure 4-8**).

4.7.6.2 Special Status Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP “State and Federal Listed Species and Significant Natural Communities” maps. According to the review, no special status species are located within the USCG Academy or the vicinity (see **Figure 4-8**).

4.8 Cultural Resources

4.8.1 Regulatory Framework

In addition to the analysis under NEPA, consideration of impacts on cultural resources is mandated under Sections 106 and 101 of the NHPA and under 36 CFR Part 800, *Protection of Historic Properties* (Section 106 implementing regulations). Additional applicable laws and regulations are presented in **Appendix C**. All properties that are either listed or eligible for listing on the National Register of Historic Places (NRHP) must possess integrity, have significance, and meet certain criteria. Consideration is given to all qualifying characteristics of a historic property, including those that might have been identified subsequent to the original evaluation of the property’s eligibility for the NRHP.



Per Section 101(d)(6)(B) of the NHPA, the USCG conducted formal consultation with Federally-recognized Native American tribes. The USCG has completed government-to-government consultation with the following Native American tribes to solicit input on tribal affiliation to lands in the New London, Connecticut area:

- Eastern Pequot Tribe
- Golden Hill Paugussett Tribe
- Mashantucket Pequot Tribe
- Paucatuck Eastern Pequot Tribe
- Schaghticoke Tribal Nation
- The Mohegan Tribe.

In summary, the USCG has determined that the requirements of Section 101(d)(6)(B) of the NHPA regarding Native American consultation have been wholly fulfilled.

In accordance with Section 106 of the NHPA, under 36 CFR Part 800, *Protection of Historic Properties (Section 106 implementing regulations)*, the USCG initiated consultation with the Connecticut State Historic Preservation Office (SHPO) to obtain information regarding known cultural resource sites at or in the vicinity of the five proposed alternative study areas, and to request an advisory opinion regarding the substance of the findings, determination, and decision regarding the Proposed Action.

According to the NHPA and the NRHP, there are 24 structures and nine historic districts within the City of New London that possess culturally significant resources and are considered worthy of preservation (NPS 2007b). Properties that are listed on the NRHP include buildings, structures, sites, districts, and objects that are found to be of significance to the history of the U.S. archaeology, architecture, engineering and culture (NPS 2007a). One additional historic district has been identified by the Connecticut Historical Commission, a division of the Connecticut SHPO, in addition to the nine listed on the NRHP (CHC 2007).

4.8.2 Parcel 1: Fort Trumbull Area

Parcel 1 does not contain any structures listed on the NRHP. Parcel 1 is the former NUWC, and is currently an undeveloped, cleared site. Fort Trumbull, which is listed on the NRHP, is located southeast of Parcel 1. In addition, Parcel 1 is in close proximity the Downtown New London Historic District, which is listed on the NRHP.

An Environmental Impact Evaluation (EIE), conducted for the NLDC, investigated the potential for historic resources being located in the area covered by the *Fort Trumbull MDP*, including what is now Parcel 1 (Milone & MacBroom, *et al.* 1998). The EIE assessed the potential presence of historic architectural resources and potentially significant archeological materials (Maddox 2001). The Connecticut SHPO reviewed the EIE and accepted the findings. No historic structures or terrain with sensitive archeological material have been encountered within the existing boundaries of Parcel 1.

4.8.3 Parcel 1A: Fort Trumbull Area

Parcel 1A does not contain any structures listed on the NRHP. Parcel 1A, similar to Parcel 1, is the former NUWC, and is currently an undeveloped, cleared site. Fort Trumbull, which is listed



on the NRHP, is located southeast of Parcel 1A. In addition, Parcel 1A is in close proximity the Downtown New London Historic District, which is listed on the NRHP.

An EIE, conducted for the NLDC, investigated the potential for historic resources being located in the area covered by the *Fort Trumbull MDP*, including what is now Parcel 1A (Milone & MacBroom, *et al.* 1998). The EIE assessed the potential presence of historic architectural resources and potentially significant archeological materials (Maddox 2001). The Connecticut SHPO reviewed the EIE and accepted the findings. No historic structures or terrain with sensitive archeological material have been encountered within the existing boundaries of Parcel 1A.

4.8.4 Parcel 4A: Fort Trumbull Area

Parcel 4A does not contain any structures listed on the NRHP. Parcel 4A is located adjacent to the former NUWC, and is currently an uninhabited residential area. Fort Trumbull, which is listed on the NRHP, is located immediately east of Parcel 4A. In addition, Parcel 4A is in close proximity the Downtown New London Historic District, which is listed on the NRHP.

An EIE, conducted for the NLDC, investigated the potential for historic resources being located in the area covered by the *Fort Trumbull MDP*, including what is now Parcel 4A (Milone & MacBroom, *et al.* 1998). The EIE assessed the potential presence of historic architectural resources and potentially significant archeological materials (Maddox 2001). The Connecticut SHPO reviewed the EIE and accepted the findings. No historic structures or terrain with sensitive archeological material have been encountered within the existing boundaries of Parcel 4A (USCG 2002).

4.8.5 Riverside Park

Riverside Park does not contain any currently NRHP-listed structures. The Dashon-Allyn House and the Winslow Ames House, both of which are NRHP-listed properties, are located approximately one-mile to the northwest of the park. In addition, due to the age of the surrounding neighborhoods, a number of other structures near the park could be eligible for NRHP-listing. Furthermore, because of historic Native American or Colonial American settlement patterns, Riverside Park possesses moderate to high sensitivity for prehistoric and historic archaeological resources.

4.8.6 USCG Academy

The USCG Academy is not listed on the NRHP, but many of its buildings date to construction of the academy campus in 1932, and therefore could qualify for the National Historic Landmark Historic District. However, according to USCG Academy personnel, Waesche Hall is not eligible for the NRHP list since it was built during or after the 1970's. The Winslow Ames House and Dashon-Allyn House, both of which are NRHP-listed properties, are located approximately one-half and one-mile, respectively, to the west of the academy. In addition, due to the age of the surrounding neighborhoods, a number of other structures near the USCG Academy could be eligible for NRHP-listing. Furthermore, there are a number of historic or cultural resources on the academy grounds, including many of the artifacts in the museum's collection, none of which are NRHP-listed or eligible. Because of historic Native American or Colonial American settlement patterns, the academy grounds may contain archaeological artifacts.



4.9 Socioeconomics

As mentioned in **Section 3.1**, two of the Alternative project study areas (Parcel 1 and Parcel 1A) are located on the former NUWC property. The NUWC property was previously owned by the U.S. Navy and, therefore, exempt from Federal, state, and local property taxes. In addition, Parcel 1 also encompasses property previously owned by Amtrak, a quasi-governmental corporation and therefore exempt from Federal, state, and local property taxes.

Thus, the City of New London did not collect property tax revenue for 32-acres within the Fort Trumbull area. With the proposed new National Museum, the property will be donated to and subsequently owned by the USCG and therefore also tax exempt; with the exception of the proposed gift shop and dining facilities to be included in the design of the museum. Parcel 4A was formerly a residential area, which generated property tax revenue for the City of New London. As discussed in the 2005 Supreme Court case *Susette Kelo, et al. v. City of New London, Connecticut, et al.* (545 U.S. 469), tax revenue prior to the Fort Trumbull area revitalization totaled approximately \$325,000. The NLDC has indicated within the *Fort Trumbull MDP* that projected tax revenues collected in the Fort Trumbull area, once the revitalization has been completed, will range between approximately \$680,544 and \$1,249,843 (NLDC 2000).

Riverside Park is currently owned and managed by the City of New London, and therefore exempt from Federal, state, and local property tax. The USCG Academy is an active military academy and is also exempt from Federal, state and local property tax.

The following subsections identify and describe the socioeconomic setting in the City of New London, New London County, and the State of Connecticut. Data used in preparing this section are primarily from the 2000 U.S. Census of Population and Housing.

4.9.1 Demographics

The 2000 U.S. Census measured populations for the State of Connecticut, New London County, and the City of New London. The State of Connecticut and New London County have both reported an increase in population compared with 1990 U.S. Census records, while the City of New London has experienced a decrease in population. **Table 4-6** provides regional population trends and projections for the State of Connecticut, New London County, and the City of New London.



**TABLE 4-6:
Regional Population Projections for the City of New London, New London County,
Connecticut**

Area	1990	2000	2005	2015	2025	Change 1990-2000 (%)
State of Connecticut	3,287,116	3,405,565	3,317,000	3,506,000	3,739,000	3.6
New London County	254,957	259,088	266,618	N/A	N/A	1.6
City of New London	28,540	25,671	N/A	N/A	N/A	-10.1

Sources: Census 2000a – Census 2000d, NACo 2005.

Note:

N/A = Data Not Available

4.9.2 Regional Economy

According to the U.S. Bureau of Labor, the City of New London currently has a labor force of 20,410 with a total of 13,438 employed, and an unemployment rate of 4.5 percent. Over the past 10 years, the City’s economy has not grown as notably as the County or State economy. The regional labor force experienced a growth in employment, with a growth rate of 1.6 percent in New London County and 3.6 percent in the State of Connecticut, whereas the City of New London experienced a reduction rate of 10.1 percent. The current USCG Museum employs one full-time employee and 20 part-time volunteers. **Table 4-7** summarizes employment by industry in the State of Connecticut, New London County, and the City of New London.

4.9.3 Housing

No active residential housing is currently located within Parcel 1, Parcel 1A, 4A or Riverside Park. However, student dormitories are located within the USCG Academy, but none are within Waesche Hall. The area surrounding Parcel 1, Parcel 1A and Parcel 4A includes an office building, vacant properties, Fort Trumbull State Park, and the Thames River. The area surrounding Riverside Park includes the USCG Academy, some residential areas, and the Thames River.

4.9.4 Schools

There are 22 schools located within the City of New London, Connecticut. Of these, 18 are public and private primary and high schools. There are four colleges/universities, including the USCG Academy.



**TABLE 4-7:
Employment Levels by Industry for the City of New London, New London County,
Connecticut (2000)**

Industry	State of Connecticut	New London County	City of New London
Agriculture and Mining	7,445	1,056	10
Construction	99,913	7,902	554
Manufacturing	246,607	17,812	1,323
Trade	238,864	17,307	1,676
Transportation	64,662	5,903	420
Information	55,202	2,859	368
Finance, Insurance, Real Estate	163,586	5,401	400
Educational, Health, and Social Services	366,568	26,027	2,882
Public Administration	67,354	7,034	642
Arts, Entertainment, Recreation, Accommodation and Food Service	111,424	19,130	2,070
Other	74,499	4,983	353

Sources: Census 2000a – Census 2000c.

4.9.5 Shops and Services

No shops or services are currently located within any of the five alternative project areas, and none are planned at this time. Retailers throughout the City of New London and within the Downtown Business District provide local shopping for area residents and visitors. Small and large retail shops are located within an approximate 1-mile radius of Parcel 1, Parcel 1A, Parcel 4A, Riverside Park, and the USCG Academy. Larger retailers are located along North Frontage Street, near I-95, approximately one mile from the USCG Academy and Riverside Park, and approximately two miles from Parcels 1, 1A and 4A.

4.9.6 Public and Occupational Health and Safety

4.9.6.1 Explosives Materials Safety

No explosive materials are currently stored within any of the five project study areas.

4.9.6.2 Police and Fire Protection

The New London area is connected to the 911 Emergency System. The City of New London Police Department provides police protection to the residents of the City of New London, which includes the four project study areas. The City of New London Police Department is located on Governor Winthrop Street. The City of New London Fire Department is located on Bank Street and provides fire protection to the Fort Trumbull area, Riverside Park and the USCG Academy.



4.9.6.3 Medical Facilities

If a medical emergency occurs, the Lawrence & Memorial Hospital is located within the City of New London. Additional medical facilities in the region include the William W. Backus Hospital (13 miles north of the City of New London in Norwich, Connecticut) and the Westerly Hospital (21 miles east of the City of New London in Westerly, Rhode Island).

4.9.6.4 Protection of Children

Because children suffer disproportionately from environmental health and safety risks, EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, was promulgated on 21 April 1997. EO 13045 was intended to (1) prioritize the identification and assessment of environmental health and safety risks that may affect children and to (2) ensure that Federal agency policies, programs, activities, and standards address environmental and safety risks to children. This subsection identifies the distribution of children and locations in which numbers of children may be proportionately high (e.g., schools, child care centers, and family housing) in the City of New London and in the surrounding New London County, and the State of Connecticut.

In order to comply with EO 13045, the number of children under the age of 18 living in the City of New London, Connecticut, was compared with the county and state levels. Additionally, locations where populations of children may be concentrated (e.g., schools, child care centers, and family housing) were determined. The City of New London has a higher percentage of its total population represented by children under age 18 when compared with New London County. In 2000, there were 7,309 children under age 18 in the City of New London, or 28.5 percent of the overall population. This compares to 26.9 percent for New London County and 27.1 percent for the State of Connecticut (Census 2000a - Census 2000c). **Table 4-8** summarizes the population under age 18 for City of New London and its surroundings.

Children living in the City of New London attend 18 public and private primary and high schools as discussed in **Section 4.9.4**. In addition, there are also approximately 15 child care centers located in New London. All of these schools and child care centers are located within an approximate 1-mile radius of Parcel 1, Parcel 1A, Parcel 4A, Riverside Park, and/or the USCG Academy.

**TABLE 4-8:
Total Population Versus Population Under Age 18 for the City of New London, New London County, Connecticut (2000)**

Area	Total Population	Population Under 18	% Population Under 18
State of Connecticut	3,405,565	925,702	27.1
New London County	259,088	69,827	26.9
City of New London	25,671	7,309	28.5

Sources: Census 2000a – Census 2000c.



4.10 Environmental Justice

4.10.1 Geographic Distribution of Minorities

As shown in **Table 4-9**, the State of Connecticut, New London County, and the City of New London are inhabited primarily by non-minority groups. However, the City of New London is inhabited by a higher percentage of minority groups in comparison to the State of Connecticut and New London County.

TABLE 4-9:
Percentage of Regional Population by Race¹ for the City of New London, New London County, Connecticut (2000)

Area	White	African American	American Indian and Alaska Native	Asian or Pacific Islander	Other Race ²	Two or More Race ³	Percent Minority
State of Connecticut	2,780,355	309,483	9,639	83,679	147,201	74,848	18.4%
New London County	225,406	13,703	2,487	5,226	5,319	6,947	13.0%
City of New London	16,299	4,784	225	565	2,343	1,455	36.5%

Sources: Census 2000a – Census 2000c.

Notes:

1. The racial classifications used by the Census Bureau were issued by the Office of Management and Budget (OMB) on October 30, 1997. The OMB requires five minimum category of race, including White, African American, American Indian and Alaska Native, and Asian or Pacific Islander.

2. The “Other Race” category approved by OMB, includes all other responses not included in “White, African American, American Indian and Alaska Native or Pacific Islander.” This category also includes entries such as multiracial, mixed, interracial, or a Hispanic/Latino group.

3. For data purposes, this category refers to combinations of two or more of the first six categories.

4.10.2 Geographic Distribution of Low-Income Populations

As shown in **Table 4-10**, the City of New London is inhabited by a higher percentage (15.8 percent) of low-income residents as compared to New London County (6.4 percent) and the State of Connecticut (7.9 percent).



**TABLE 4-10:
Income and Poverty Statistics of Regional Population for the City of New London, New
London County, Connecticut**

Area	Total Population (2000)	Median Household Income (1999)	Total Number of Persons At or Below Poverty Level (ABPL) (1999)	Total Percent ABPL (1999)
State of Connecticut	3,405,565	\$53,935	259,514	7.9%
New London County	259,088	\$50,646	15,780	6.4%
City of New London	25,671	\$33,809	3,643	15.8%

Sources: Census 2000a – Census 2000c; Census 2000e – Census 2000g.

4.10.3 Consumption Patterns

Based on socioeconomic data consulted and referenced in the above sections, no identifiable populations or local groups in the vicinity of the project study area currently rely solely on fish or wildlife for subsistence. Of the multiple personnel interviewed to gather data for preparation of this EA, none identified any local population segments that meet these criteria.

4.11 Infrastructure

4.11.1 Parcel 1: Fort Trumbull Area

4.11.1.1 Potable Water Supply

No potable water wells are currently located within Parcel 1 of the Fort Trumbull area.

4.11.1.2 Wastewater Treatment

No wastewater treatment is currently provided at Parcel 1. However, the New London Wastewater Treatment facility is located within the Fort Trumbull area, approximately 2,000 ft south of Parcel 1.

4.11.1.3 Solid Waste Disposal

No solid waste disposal is currently provided at Parcel 1.

4.11.1.4 Energy Sources

Electricity

Currently no electricity is provided to Parcel 1; however, electrical lines provided by Connecticut Light & Power service the surrounding Fort Trumbull area and were observed in the Parcel 1 vicinity.



Fossil Fuels

Fossil fuels are not currently used or stored within the boundaries of Parcel 1.

4.11.1.5 Telecommunications

No telephone service is currently provided to Parcel 1; however, telephone lines on utility poles in the immediate vicinity service the surrounding Fort Trumbull area.

4.11.1.6 Transportation

Local Roadways

Access to Parcel 1 is provided by Nameaug Street. Walbach Street and Trumbull Street, located south of Parcel 1, provide access to the Fort Trumbull area, via Howard Street. Additional roadways in the Fort Trumbull area include Chelsea Street, East Street, and Bowditch Street.

Passenger and Freight Rail Access and Service

Amtrak rail lines border Parcel 1 on the west.

4.11.2 Parcel 1A: Fort Trumbull Area

4.11.2.1 Potable Water Supply

No potable water wells are currently located within Parcel 1A of the Fort Trumbull area.

4.11.2.2 Wastewater Treatment

No wastewater treatment is currently provided at Parcel 1A. However, the New London Wastewater Treatment facility is located within the Fort Trumbull area, approximately 2,000 ft south of Parcel 1A.

4.11.2.3 Solid Waste Disposal

No solid waste disposal is currently provided at Parcel 1A.

4.11.2.4 Energy Sources

Electricity

Currently no electricity is provided to Parcel 1A; however, electrical lines provided by Connecticut Light & Power service the surrounding Fort Trumbull area and were observed in the Parcel 1A vicinity.

Fossil Fuels

Fossil fuels are not currently used or stored within the boundaries of Parcel 1A.



4.11.2.5 Telecommunications

No telephone service is currently provided to Parcel 1A; however, telephone lines on utility poles in the immediate vicinity service the surrounding Fort Trumbull area.

4.11.2.6 Transportation

Local Roadways

Access to Parcel 1A is provided by Nameaug Street. Walbach Street and Trumbull Street, located south of Parcel 1A, provide access to the Fort Trumbull area, via Howard Street. Additional roadways in the Fort Trumbull area include Chelsea Street, East Street, and Bowditch Street.

Passenger and Freight Rail Access and Service

Amtrak rail lines are located to the west of Parcel 1A.

4.11.3 Parcel 4A: Fort Trumbull Area

4.11.3.1 Potable Water Supply

No potable water wells are currently located within Parcel 4A of the Fort Trumbull area.

4.11.3.2 Wastewater Treatment

No wastewater treatment is currently provided at Parcel 4A. However, the New London Wastewater Treatment facility is located within the Fort Trumbull area, approximately 2,000 ft west of Parcel 4A.

4.11.3.3 Solid Waste Disposal

No solid waste disposal is currently provided at Parcel 4A.

4.11.3.4 Energy Sources

Electricity

Currently no electricity is provided to Parcel 4A; however, electrical lines provided by Connecticut Light & Power service the surrounding Fort Trumbull area and were observed in the Parcel 4A vicinity.

Fossil Fuels

Fossil fuels are not currently used or stored within the boundaries of Parcel 4A.

4.11.3.5 Telecommunications

No telephone service is currently provided to Parcel 4A; however, telephone lines on utility poles in the immediate vicinity service the surrounding Fort Trumbull area.



4.11.3.6 Transportation

Local Roadways

Access to Parcel 4A is provided by Walbach Street, Trumbull Street, East Street and Smith Street. Access to the Fort Trumbull area is provided via Howard Street. Additional roadways in the Fort Trumbull area include Chelsea Street, Nameaug Street, and Bowditch Street.

Passenger and Freight Rail Access and Service

Amtrak rail lines are located to the west of Parcel 4A.

4.11.4 Riverside Park

4.11.4.1 Potable Water Supply

No potable water wells are currently located within Riverside Park. Potable water in the park is provided by the New London Water and Sewer Authority.

4.11.4.2 Wastewater Treatment

Wastewater treatment at Riverside Park is currently provided by the New London Water and Sewer Authority and the New London Wastewater Treatment facility.

4.11.4.3 Solid Waste Disposal

Solid waste disposal at Riverside Park is provided by the New London Solid Waste Division.

4.11.4.4 Energy Sources

Electricity

Electricity is provided to Riverside Park by Connecticut Light & Power.

Fossil Fuels

Fossil fuels are not currently used or stored within Riverside Park.

4.11.4.5 Telecommunications

No telephone service is currently provided to Riverside Park; however, telephone lines are located on utility poles in the immediate vicinity.

4.11.4.6 Transportation

Local Roadways

Riverside Heights is located within Riverside Park, while Adelaide Street, Stanners Street, and Bolles Avenue are located east the Park and provide access. Additional roadways in the vicinity of the project study area include I-95 (also U.S. Route 1) and Williams Street.



Passenger and Freight Rail Access and Service

The New England Central Railroad currently transects Riverside Park along the Thames River. The New England Central Railroad operates a freight rail service with the mainline running from New London, Connecticut to East Alburg, Vermont.

4.11.5 USCG Academy

4.11.5.1 Potable Water Supply

No potable wells are currently located within the USCG Academy. However, potable water is provided to the USCG Academy by the New London Water and Sewer Authority.

4.11.5.2 Wastewater Treatment

Wastewater treatment is currently provided to the USCG Academy by the New London Water and Sewer Authority and the New London Wastewater Treatment facility.

4.11.5.3 Solid Waste Disposal

Solid waste disposal at the USCG Academy is currently provided under a private contract.

4.11.5.4 Energy Sources

Electricity

Electricity at the USCG Academy is provided by Connecticut Light & Power.

Fossil Fuels

Fossil fuels are currently located within the USCG Academy campus, however no fossil fuels are associated with Waesche Hall.

4.11.5.5 Telecommunications

Telephone service is provided to the USCG Academy. Telephone lines are located throughout the campus.

4.11.5.6 Transportation

Local Roadways

Mohegan Avenue (Connecticut Route 32) provides access to the USCG Academy and runs along the Academy's western boundary. Connecticut Route 32 is a major State route running north-south along the western bank of the Thames River. Additional roadways in the vicinity of the project study area include I-95 (also U.S. Route 1) and Williams Street.



Passenger and Freight Rail Access and Service

The New England Central Railroad currently transects USCG Academy along the Thames River. The New England Central Railroad operates a freight rail service with the mainline running from New London, Connecticut to East Alburg, Vermont.

4.12 Hazardous and Toxic Materials/Waste

4.12.1 Parcel 1: Fort Trumbull Area

4.12.1.1 On-Site Storage Tanks

AMEC has encountered no documentary evidence indicating that petroleum storage tanks are currently located within Parcel 1.

4.12.1.2 Past Spills and Leaks

Historically, spills and leaks have occurred within Parcel 1 of the Fort Trumbull area, the former location of the NUWC. All contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility (see **Section 4.12.1.5**). In addition, according to NLDC representatives, approximately 4 ft of clean fill was placed on the site.

4.12.1.3 Spill Prevention, Control, and Countermeasures Plan

A Spill Prevention, Control, and Countermeasures (SPCC) Plan has not been developed for Parcel 1.

4.12.1.4 On-Site Environmental Concerns

There are no on-site HTMW concerns within Parcel 1.

4.12.1.5 Previous Site Investigations

- In August 1999, approved February 2000, the NLDC established the *Fort Trumbull Municipal Development Plan* to attempt the creation of an economic asset for the City of New London, Connecticut and within the Fort Trumbull area. Parcel 1 was included in the evaluation of the area. During the development of the plan, an area-wide Phase I Environmental Site Assessment was conducted in order to establish the environmental conditions of the Fort Trumbull area, in addition to 15 Phase II Environmental Site Assessments in areas where environmental contamination of soils and groundwater was believed to exist. Of the 15 specific areas investigated, none included Parcel 1. The Fort Trumbull Municipal Development Plan determined that the redevelopment of the Fort Trumbull area would result in no significant, unmitigable, long-term, negative impacts; all potential impacts identified in the *Fort Trumbull Municipal Development Plan* are able to be mitigated to less-than-significant levels (NLDC 2000).
- HRP Associates, Inc. and the NLDC prepared the *Soil Remedial Action Report NUWC – Area A, Parcel F New London, Connecticut*, in March 2002; in this report, Area A, Parcel F encompasses Parcel 1. The purpose of the report was to support and enable



the Navy determination of a Finding of Suitability to Transfer (FOST) to achieve property transfer before a redevelopment of the property by the NLDC and a private developer. In addition, the objective of the remedial actions conducted was to bring the soils located at Area A, Parcel F (currently Parcel 1) into compliance with the Remediation Standard Regulations (RSRs). According to the report, all of the contaminated materials were successfully removed from the site and disposed of at an appropriate, off-site facility (HRP 2002).

- In July 2002, the *Final Interim Soil Remediation Action Report New London Development Corporation Fort Trumbull MDP – Phase II Remediation Area B New London, Connecticut* was prepared; in this report, Area B encompasses the Parcel 1. The area discussed comprises approximately 11 acres located north of Walbach Street, south of Shaw's Cove, and east of the Amtrak railroad tracks. According to the report, environmental impacts had occurred to the area that are attributable to past site activities, such as the former Castle Oil property, former Amtrak facility, former foundry operations, and marine railway operations, in addition to several residential and commercial properties. The purpose of the remediation was to bring the area into compliance with the requirements of the CTDEP RSRs, found in the RCSA Sections 22a-133k-1 to 22a-133k-3. The report discusses further that the soil remediation and interim grading and site restoration activities had been completed. However, final site grading and construction activities at the site would be the responsibility of the NLDC (Metcalf 2002).
- HRP Associates, Inc., in cooperation with Metcalf & Eddy, Inc., prepared the *Remedial Investigation/Feasibility Study Report Area B Fort Trumbull MDP Area New London, Connecticut* in December 2001; in this report, Area B encompasses Parcel 1. The purpose of the report was to identify any areas of concern (AOC) within Fort Trumbull Area B regarding contaminated soils and groundwater. The report determined that several properties within Area B were classified as AOCs. The report concluded that additional investigations were required in order to address all the AOCs within Fort Trumbull Area B. This includes areas of soil contamination due to Extractable Total Petroleum Hydrocarbons (ETPH) and Semi-Volatile Organic Compounds (SVOCs), and groundwater contamination as a result of VOCs and LNAPL petroleum. Shoreline investigations discussed in the report conclude that arsenic and lead were present in sediments examined. However, it had been noted that both arsenic and lead are present in sediments throughout the lower Thames River estuary at levels exceeding the regulatory thresholds (HRP 2001).

AMEC personnel are not aware of an Environmental Baseline Survey (EBS) for the Parcel 1 or the Fort Trumbull area.

4.12.2 Parcel 1A: Fort Trumbull Area

4.12.2.1 On-Site Storage Tanks

AMEC has encountered no documentary evidence indicating that petroleum storage tanks are currently located within Parcel 1A.



4.12.2.2 Past Spills and Leaks

Historically, spills and leaks have occurred within Parcel 1A of the Fort Trumbull area, the former location of the NUWC. All contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility (see **Section 4.12.1.5**). In addition, according to NLDC representatives, approximately 4 ft of clean fill was placed on the site.

4.12.2.3 Spill Prevention, Control, and Countermeasures Plan

A SPCC Plan has not been developed for Parcel 1A.

4.12.2.4 On-Site Environmental Concerns

There are no on-site HTMW concerns within Parcel 1A.

4.12.2.5 Previous Site Investigations

For previous site investigations at Parcel 1A, refer to **Section 4.12.1.5**. AMEC personnel are not aware of an EBS for the Parcel 1A or the Fort Trumbull area.

4.12.3 Parcel 4A: Fort Trumbull Area

4.12.3.1 On-Site Storage Tanks

AMEC has encountered no documentary evidence indicating that petroleum storage tanks are currently located within Parcel 4A.

4.12.3.2 Past Spills and Leaks

No spills or leaks are known to have occurred at Parcel 4A; however, resulting from the close proximity to the former NUWC, potential soil and groundwater contamination might exist within Parcel 4A (USCG 2002). All contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility (see **Section 4.12.3.5**).

4.12.3.3 Spill Prevention, Control, and Countermeasures Plan

A SPCC Plan has not been developed for Parcel 4A (USCG 2002).

4.12.3.4 On-Site Environmental Concerns

There are no on-site HTMW concerns within Parcel 4A (USCG 2002).

4.12.3.5 Previous Site Investigations

- In August 1999, approved February 2000, the NLDC established the *Fort Trumbull MDP* to attempt the creation of an economic asset for the City of New London, Connecticut and within the Fort Trumbull area. Parcel 4A was included in the evaluation of the area. During the development of the plan, an area-wide Phase I Environmental Site Assessment was conducted in order to establish the environmental conditions of the Fort Trumbull area. The Phase I Environmental Site Assessment



indicated that no serious issues beyond the presence of widespread urban fill, which is expected to have contaminants exceeding the State of Connecticut Direct Exposure Criteria. In addition to 15 Phase II Environmental Site Assessments in areas where environmental contamination of soils and groundwater was believed to exist. Of the 15 specific areas investigated, Parcel 4A was identified as an area for additional investigation and would be required prior to development. The Fort Trumbull Municipal Development Plan determined that the redevelopment of the Fort Trumbull area would result in no significant, unmitigable, long-term, negative impacts; all potential impacts identified in the *Fort Trumbull MDP* are able to be mitigated to less-than-significant levels (NLDC 2000).

- In February 2003, HRP Associates, Inc., completed the Preliminary Scope of Work for the Parcel 4A Subsurface Investigations, Fort Trumbull MDP Area, New London, Connecticut (HRP #RA60), for site inspections of previously identified Areas of Concern (AOCs) within Parcel 4A. HRP Associates, Inc. proposed to investigate 16 of the previously identified AOCs through hand samples, geoprobe borings, test pits, groundwater monitoring wells and soil gas surveys in the effort to determine the extent and degree of contamination in addition to characterizing the Parcel 4A fill (HRP 2003).

AMEC personnel are not aware of an EBS for the Parcel 4A or the Fort Trumbull area.

4.12.4 Riverside Park

4.12.4.1 On-Site Storage Tanks

According to City of New London Personnel, no petroleum storage tanks are or have ever been located within Riverside Park (Steward 2007).

4.12.4.2 Past Spills and Leaks

According to City of New London personnel, no spills or leaks have occurred within Riverside Park (Samul 2007, Steward 2007).

4.12.4.3 Spill Prevention, Control, and Countermeasures Plan

An SPCC Plan has not been developed for Riverside Park.

4.12.4.4 On-Site Environmental Concerns within Riverside Park

There are no on-site HTMW concerns within Riverside Park (Samul 2007).

4.12.4.5 Previous Site Investigations

AMEC personnel are not aware of an RI/FS or an EBS having been prepared for Riverside Park.



4.12.5 USCG Academy

4.12.5.1 On-Site Storage Tanks

According to USCG Academy personnel, there are no petroleum storage tanks located within the USCG Academy's Waesche Hall (Buck 2007).

4.12.5.2 Past Spills and Leaks

According to USCG Academy personnel spills or leaks have not occurred within the USCG Academy's Waesche Hall (Buck 2007).

4.12.5.3 Spill Prevention, Control, and Countermeasures Plan

The USCG Academy SPCC Plan includes Waesche Hall; however, no petroleum storage tanks are located at Waesche Hall (Buck 2008).

4.12.5.4 On-Site Environmental Concerns within the USCG Academy

There are no on-site HTMW concerns within the USCG Academy's Waesche Hall (Buck 2007).

4.12.5.5 Previous Site Investigations

AMEC personnel have encountered no documentation that an RI/FS or EBS has been prepared for the USCG Academy. A preliminary assessment was conducted at the USCG Academy in 2001, including Waesche Hall. No concerns were identified in association with Waesche Hall (Buck 2008).



5.0 ENVIRONMENTAL CONSEQUENCES

5.1 General Overview

This section identifies potential direct and indirect effects of the identified alternatives on each issue area presented in **Section 4.0**, and compares and contrasts the potential effects of those alternatives. The potential environmental, cultural, and socioeconomic effects of implementing each identified alternative, as well as mitigation/management measures associated with each alternative, are also presented. **Appendix B** provides a discussion of commonly encountered NEPA concepts, terminology, and significance criteria.

5.2 Land Use

5.2.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Less-than-significant land use impacts would be anticipated to result from implementation of Alternative 1. Per Resolution 060427-2 of the *Fort Trumbull MDP*, Parcel 1 is split into two parcels (Parcel 1A and 1B). Currently, Parcel 1A is proposed as the location of a museum, and Parcel 1B is identified as the location of a hotel and conference center by NLDC. The USCG has not agreed to this location, as this NEPA analysis must be completed prior to any agreements. The current land use designation, *Commercial, Industrial & Pavement*, would remain at Parcel 1 due to implementation of the Proposed Action. In addition, no zoning conflicts would be anticipated.

The implementation of Alternative 1 would require a minor modification to the *Fort Trumbull MDP*, providing the proposed hotel and conference center could be relocated to another parcel within the Fort Trumbull area, consistent with the *Fort Trumbull MDP*. Further, in accordance with the Fort Trumbull MDP, Parcel 1 must provide adequate public access and water dependent uses in order to maintain a level of accessibility. The level of water dependent uses, as identified in the Fort Trumbull MDP includes, a marina for local residents, Fort Trumbull hotel occupants, and the general public and will provide various opportunities, including boat rentals, boating lessons, and fishing, and thereby adding interest, entertainment, and water-edge activities in the Fort Trumbull area (NLDC 2000).

No adverse land use impacts would be anticipated at the Coast Guard Exhibit Center in Forestville, Maryland. As discussed in **Section 3.1**, selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum, and the Coast Guard Exhibit Center would remain in operation, continuing to store selected artifacts and documents.

5.2.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

No adverse land use impacts would be anticipated to result from implementation of Alternative 2. Based on an evaluation of the proposed activity compared with municipal land use plans, the Proposed Action is consistent with current and future land use designations. The current land use designation, *Commercial, Industrial & Pavement*, would remain at Parcel 1A due to implementation of the Proposed Action; no zoning conflicts would be anticipated.



Alternative 2 is consistent with the *Fort Trumbull MDP* plan. Per Resolution 060427-2 of the *Fort Trumbull MDP*, Parcel 1A is identified as the proposed location of a museum.

No adverse land use impacts would be anticipated at the Coast Guard Exhibit Center in Forestville, Maryland. As discussed in **Section 3.1**, selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum, and the Coast Guard Exhibit Center would remain in operation, continuing to store selected artifacts and documents.

5.2.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Less-than-significant land use impacts would be anticipated to result from implementation of Alternative 3. Per Resolution 060427-2 of the *Fort Trumbull MDP*, Parcel 4A is identified as Park and Marina support. The current land use designation described in **Section 4.2.4**, *Marine Commercial*, would likely be modified to *Commercial, Industrial & Pavement* at Parcel 4A due to implementation of the Proposed Action; no adverse zoning conflicts would be anticipated.

The implementation of Alternative 3 would require a minor modification to the *Fort Trumbull MDP*, in order to locate the proposed New National Museum at Parcel 4A, consistent with the *Fort Trumbull MDP*.

In addition, should Alternative 3 be implemented, buildings currently found within the boundaries of Parcel 4A would be demolished, required environmental remediation would be performed, appropriate infrastructure would be installed, and the parcel would be graded by the NLDC prior to the land acquisition by the NCGMA.

No adverse land use impacts would be anticipated at the Coast Guard Exhibit Center in Forestville, Maryland. As discussed in **Section 3.1**, selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum, and the Coast Guard Exhibit Center would remain in operation, continuing to store selected artifacts and documents.

5.2.4 Effects of Alternative 4 (Riverside Park)

Less-than-significant land use impacts would be anticipated due to implementation of Alternative 4. Currently, Riverside Park is designated *Deciduous Forest*, bordered by *Commercial, Industrial & Pavement*. Based on an evaluation of the proposed activity compared with municipal land use plans, the Proposed Action is not consistent with the current or future land use designations. Implementation of Alternative 4 would require an amendment to the City of New London's zoning ordinance.

Minor, less-than-significant land use impacts would be anticipated due to the loss of less than 3 acres of park/deciduous forest.

No adverse land use impacts would be anticipated at the Coast Guard Exhibit Center in Forestville, Maryland. As discussed in **Section 3.1**, selected USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be transferred to the new National Museum, and the Coast Guard Exhibit Center would remain in operation, continuing to store selected artifacts and documents.



5.2.5 Effects of Alternative 5 (No Action Alternative)

No land use impacts would result from implementation of Alternative 5. Currently, the USCG Academy is designated as *Residential & Commercial*. Based on an evaluation of the proposed activity compared with municipal land use plans, the continued operation of the existing USCG museum at the USCG Academy is consistent with current and future land use plans. The current land use designation, *Residential & Commercial* would remain at the USCG Academy if Alternative 5 were selected.

Additionally, no land use impacts at the Coast Guard Exhibit Center in Forestville, Maryland would be anticipated from the implementation of Alternative 5. With the implementation of the No Action Alternative, the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation and no USCG artifacts and documents would be transferred to the new National Museum.

Further, it is reasonably foreseeable that the implementation of Alternative 5 would result in no adverse land use impacts at Fort Trumbull or Riverside Park. The development of the proposed hotel and conference center on Parcel 1 is consistent with current and future land use designations (*Commercial, Industrial & Pavement*). In addition, the proposed improvements for Riverside Park would be consistent with current and future land use designations (*Deciduous Forest*).

5.2.6 Mitigation/Management Measures

No mitigation/management measures would be required to address land use impacts expected to result from the implementation of Alternative 2 or Alternative 5. Implementation of Alternative 1 and Alternative 3 would require a minor modification to the *Fort Trumbull MDP*. Implementation of Alternative 4 would require an amendment to the City of New London's zoning ordinance.

5.3 Air Quality

5.3.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Under Alternative 1, less-than-significant, short-term direct impacts to air quality would result from the private construction of the new National Museum. The Proposed Action would result in an increase of VOCs and NO_x during construction activities.

Fugitive dust from on-site construction activities, and mobile source emissions from construction vehicles, equipment, and the motor vehicles of construction workers, are expected to affect air quality. Project construction would involve earth movement, grading, and other typical construction activities. Fugitive dust and mobile source emissions during construction would result in direct, minor, short-term adverse, air quality impacts.

Less-than-significant, short-term air quality impacts from mobile source emissions during the transfer of USCG artifacts and documents from the Coast Guard Exhibit Center in Forestville, Maryland, would be anticipated.



The operation of the new National Museum may involve the use of a heating system that would have the potential to produce emissions; however, the emissions produced by this type of heating system would be less-than-significant (see **Appendix E**).

Additionally, minor adverse air quality impacts would result from the operation of the New National Museum. This is due to mobile source emissions from the anticipated visitation by approximately 200,000 visitors per year. The annual emissions for the proposed new National Museum during the operating lifetime are estimated to be approximately 11.5 tons per year (tpy) NO_x and 3.8 tpy VOCs (refer to **Table E-2** in **Appendix E**). However, based on the air quality conformity determination, these adverse impacts would be below *de minimis* threshold levels (100 tpy NO_x and 50 tpy VOCs) (see **Appendix E**).

5.3.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Air quality impacts associated with Alternative 2 would be identical to those described in **Section 5.3.1**.

5.3.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Air quality impacts associated with Alternative 3 would be identical to those described in **Section 5.3.1**.

5.3.4 Effects of Alternative 4 (Riverside Park)

Air quality impacts associated with Alternative 4 would be identical to those described in **Section 5.3.1**.

5.3.5 Effects of Alternative 5 (No Action Alternative)

No air quality impacts would be anticipated as a result of the implementation of Alternative 5. Continued operation of the existing USCG Museum at the USCG Academy would involve the continued visitation by approximately 20,000 visitors per year, resulting in less-than-significant air quality impacts from mobile source emissions. No new construction would occur as a result of the implementation of Alternative 5. Additionally, the continued operation of the Coast Guard Exhibit Center in Forestville, Maryland, would result in less-than-significant air quality impacts from heating and cooling systems currently in place.

Further, it is reasonably foreseeable that the development of the proposed hotel and conference center on Parcel 1 and 1A would result in direct, minor, short-term adverse, air quality impacts due to construction, and less-than-significant long-term impacts as a result of operation. In addition, it is reasonably foreseeable that less-than-significant air quality impacts would result from the proposed development of Parcel 4A as prescribed in the *Fort Trumbull MDP*, as well as the improvements and continued operation of Riverside Park.

5.3.6 Mitigation/Management Measures

To control or minimize construction-related and operational emissions, the following Best Management Practices (BMPs) are recommended for every proposed project involving on-site construction:



- Use appropriate dust-suppression methods during on-site construction activities. Recommended methods include: application of water, soil stabilizers, or vegetation; use of wind break enclosures; use of covers on soil piles and dump truck loads; use of silt fences; and suspension of earth-movement activities during high-wind conditions.
- Maintain a speed of less than 15 miles per hour (mph) with construction equipment on unpaved surfaces.
- Use electricity from power poles instead of generators when possible.
- Repair and service construction equipment according to the regular maintenance schedule recommended for each equipment type.
- Use low-VOC architectural materials and supplies equipment.
- Incorporate energy-efficient supplies when feasible.

Implementation of the above mitigation/management measures would further reduce identified minor adverse air quality impacts.

5.4 Noise

5.4.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Short-term, moderate adverse construction-related noise impacts would be anticipated as a result of the implementation of Alternative 1. Construction workers, as well as nearby businesses, residences, and visitors would be expected to experience short-term noise impacts due to construction of the new National Museum. Individual pieces of construction equipment typically generate noise levels of 80 to 90 dBA at a distance of 50 ft. With multiple pieces of equipment operating concurrently, noise levels can be relatively high during daytime periods at locations within several hundred ft of active construction sites. The zone of relatively high construction noise levels typically extends to distances of 400 to 800 ft from the site of major equipment operations. Locations over 1,000 ft from construction sites seldom experience significant levels of construction noise. **Table 5-1** presents typical noise levels (i.e., dBA at 50 ft) estimated by the USEPA for the main phase of outdoor construction.

**TABLE 5-1:
Typical Noise Levels Associated with Outdoor Construction**

Construction Phase	dBA at 50 feet from Source
Ground Clearing	84
Excavation, Grading	89
Foundations	78
Structural	85
Finishing	89

Source: USEPA 1971.



No significant operational noise impacts would be anticipated to result from the implementation of Alternative 1. Parcel 1 is located within a Class B Noise Zone, defined by State of Connecticut as an area involving commercial and recreational activities. The operation of the new National Museum would not result in a significant increase in current noise levels in the Fort Trumbull area. The new National Museum would display USCG artifacts providing passive public enjoyment and education. According to the State of Connecticut regulations on the control of noise, a Class B emitter may not emit noises in excess of 62 dBA (USCG 2002). In addition, according to HUD standards, “acceptable” noise levels should not exceed 65 dBA (see **Section 4.4**). The operation of the new National Museum would comply with both the State of Connecticut Regulations and the HUD standards.

5.4.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Noise impacts associated with Alternative 2 would be identical to those described in **Section 5.4.1**.

5.4.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Noise impacts associated with Alternative 3 would be identical to those described in **Section 5.4.1**.

5.4.4 Effects of Alternative 4 (Riverside Park)

Short-term, moderate adverse construction-related noise impacts would be anticipated as a result of the implementation of Alternative 4. Construction workers, as well as immediately adjacent schools (Winthrop School), businesses and residences would be expected to experience short-term, moderate adverse noise impacts due to construction of the new National Museum. Individual pieces of construction equipment typically generate noise levels of 80 to 90 dBA at a distance of 50 ft. With multiple pieces of equipment operating concurrently, noise levels can be relatively high during daytime periods at locations within several hundred ft of active construction sites. The zone of relatively high construction noise levels typically extends to distances of 400 to 800 ft from the site of major equipment operations. Locations over 1,000 ft from construction sites seldom experience adverse levels of construction noise. **Table 5-1** presents typical noise levels (i.e., dBA at 50 ft) estimated by the USEPA for the main phase of outdoor construction.

No significant operational noise impacts would be anticipated to result from the implementation of Alternative 4. Riverside Park is located within a Class B Noise Zone. The operation of the new National Museum would not result in a significant increase in current noise zones in the Riverside Park area. The new National Museum would display USCG artifacts providing passive public enjoyment and education. According to the State of Connecticut regulations on the control of noise, a Class B emitter may not emit noises in excess of 62 dBA (USCG 2002). In addition, according to HUD standards, “acceptable” noise levels should not exceed 65 dBA (see **Section 4.4**). The operation of the new National Museum would comply with both the State of Connecticut Regulations and the HUD standards.



5.4.5 Effects of Alternative 5 (No Action Alternative)

No significant noise impacts would be anticipated to result from selection of Alternative 5. Continued operation of the existing USCG Museum at the USCG Academy would not involve new construction or museum expansion. Therefore, no noise impacts would be anticipated.

In addition, it is reasonably foreseeable that the development of the proposed hotel and conference center on Parcel 1, and 1A, the proposed development at Parcel 4A as prescribed in the *Fort Trumbull MDP*, and the proposed improvements at Riverside Park would result in short-term, moderate adverse construction-related noise impacts. However, no significant operational noise impacts would be anticipated.

5.4.6 Mitigation/Management Measures

To reduce anticipated construction-related and operational noise impacts, the following BMPs are recommended:

- Conduct construction activities during daylight hours. Construction noise levels vary throughout the duration of the project; therefore, conducting construction activities during workday hours drastically lessens the impact to any nearby residences and/or businesses.
- Post warning signs a minimum of 50 ft from the construction area. The warning sign will indicate that areas beyond the posted signs are “High Noise Areas” and that hearing protection is required beyond that point. When used properly, hearing protection can considerably reduce long-term hearing loss.

Implementation of the above mitigation/management measures would further reduce identified minor adverse noise impacts.

5.5 Geology, Topography, and Soils

5.5.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Implementation of Alternative 1 would involve site preparation associated with proposed construction. Proposed project components would encompass approximately 9.5 acres within the Fort Trumbull area and would occur within previously disturbed areas. No construction-related impacts to geological resources (e.g., through deep excavation) would be anticipated. None of the soils within the project study area are considered Prime Farmland soils or soils of statewide importance. Furthermore, no substantial changes to the topography of the project area would be anticipated.

During construction, short-term soil erosion and sedimentation impacts could be possible as the proposed buildings and other project components are constructed. Construction would remove some vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface water runoff. Exposure of the soils during construction has the potential to result in increased sedimentation of the Thames River. This short-term impact would be considered less-than-significant. As identified in **Section 4.5.1**, soils found within Parcel 1 are moderately to excessively drained. Therefore, the potential for



erosion during construction would be slight to moderate, resulting in a direct, minor, short-term adverse soil impact.

No significant operational impacts to geology, topography, and soils would be anticipated due to implementation of Alternative 1.

5.5.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Impacts to geology, topography and soils, associated with Alternative 2, would be identical to those described in **Section 5.5.1**.

As identified in **Section 4.5.2**, soils found within Parcel 1 are moderately to excessively drained. Therefore, the potential for erosion during construction would be slight to moderate, resulting in a direct, minor, short-term adverse soil impact.

5.5.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Implementation of Alternative 3 would involve site preparation associated with proposed construction. Proposed project components would encompass approximately 2.5 acres within the Fort Trumbull area and would occur within previously disturbed areas. No construction-related impacts to geological resources (e.g., through deep excavation) would be anticipated. None of the soils within the project study area are considered Prime Farmland soils or soils of statewide importance. Furthermore, no substantial changes to the topography of the project area would be anticipated.

Prior to the land acquisition by the NCGMA and the implementation of Alternative 3, buildings currently found within the boundaries of Parcel 4A would be demolished, required environmental remediation would be performed, appropriate infrastructure would be installed, and the parcel would be graded by the NLDC.

During construction, short-term soil erosion and sedimentation impacts could be possible as the proposed buildings and other project components are constructed. Construction would remove some vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface water runoff. Exposure of the soils during construction has the potential to result in increased sedimentation of the Thames River. This short-term impact would be considered less-than-significant. As identified in **Section 4.5.4**, soils found within Parcel 4A are moderately to excessively drained. Therefore, the potential for erosion during construction would be slight to moderate, resulting in a direct, minor, short-term adverse soil impact.

No significant operational impacts to geology, topography, and soils would be anticipated due to implementation of Alternative 3.

5.5.4 Effects of Alternative 4 (Riverside Park)

Implementation of Alternative 4 would involve site preparation associated with proposed construction. Proposed project components would encompass less than 3 acres within Riverside Park. It is anticipated that construction would occur within previously disturbed areas (e.g., parking lots, athletic fields). No construction-related impacts to geological resources (e.g., through deep excavation) would be anticipated. Soils within the project study area are not



considered Prime Farmland soils or soils of statewide importance. Furthermore, no substantial construction-related changes to the topography of the project study area would be anticipated.

During construction, short-term soil erosion and sedimentation impacts could be possible as the proposed buildings and other project components are constructed. Construction would remove vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. As identified in **Section 4.5.3**, soils found within Riverside Park are moderately to excessively drained. Therefore, the potential for erosion during construction would be slight to moderate, resulting in a direct, minor, short-term adverse soil impact.

No significant operational impacts to geology, topography, and soils would be anticipated due to implementation of Alternative 4.

5.5.5 Effects of Alternative 5 (No Action Alternative)

No significant impacts to geology, topography, and soils would result from the implementation of Alternative 5. The existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. As a result, there would be no ground disturbance associated with implementation of this alternative.

Further, it is reasonably foreseeable that short-term adverse soil erosion and sedimentation impacts to Parcel 1, 1A, 4A, and within Riverside Park would occur as a result of construction of any of the foreseeable proposed projects. No significant operational impacts to geology, topography, and soils would be anticipated.

5.5.6 Mitigation/Management Measures

No significant, unmitigable construction-related impacts to geology, topography, or soils would be anticipated due to implementation of Alternative 1, 2, 3 or 4. The construction of the new National Museum could change the micro-topography (i.e., a change no more than 10 ft in relief), mainly due to grading and site preparation activities. Construction would involve earth movement, in the form of grading, site clearing, and would not involve substantial cut and fill activities. Soil erosion would be the primary, potential construction-related impact.

Prior to initiation of any on-site construction it is recommended that the NCGMA in coordination with the USCG:

- Prepare a detailed, site-specific Erosion and Sedimentation (E&S) Control Plan to address all earth-moving aspects of the Proposed Action. The E&S Control Plan would include specific guidelines and engineering controls to mitigate anticipated erosion and resultant sedimentation impacts from establishment and operation of the proposed facilities. Measures may include the use of filter fences, sediment berms, interceptor ditches, and/or other sediment control structures, as well as the seeding/re-vegetation of areas temporarily cleared of vegetation. Re-vegetation plans and requirements included in the E&S Control Plan shall include planting during the optimum seeding season, whenever possible. Use of native grasses for re-vegetation of disturbed soils should be addressed in the E&S Control Plan. No plant materials should be used from species considered invasive as defined by EO 13112, *Invasive*



Species. Regionally native plant species should be favored as required by EO 13148, *Greening the Government through Leadership in Environmental Management*, Section 207 – *Environmentally and Economically Beneficial Landscaping*.

- Submit the site-specific E&S Control Plan to the New London County Soil Conservation District office for review and approval. The NCGMA would receive certification from the New London County Soil Conservation District prior to initiating construction.

If measures in the E&S Control Plan are approved and correctly utilized for site development, soil erosion and resulting sedimentation of the Thames River would be reduced to less-than-significant levels. Successful implementation of these measures will ensure that the Proposed Action is compliant with Federal and state standards, and would minimize both short- and long-term potential for erosion and sedimentation.

5.6 Water Resources

Implementation of Alternative 1, 2, 3 or 4 would require compliance with Section 307 of the CZMA (16 USC 1451-1456), and the CCMA (CGS sections 22a-90 through 22a-112), to the maximum extent practicable, in accordance with the Connecticut Coastal Management Manual. The USCG initiated consultation with the CTDEP, OLISP to obtain an initial determination on the project and to request an advisory opinion regarding the Proposed Action.

5.6.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Overall, no significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 1. Parcel 1 is located within the coastal boundary and is a waterfront property. Implementation of Alternative 1 must maintain the level of water dependent uses prescribed in the Fort Trumbull MDP (refer to **Section 4.6.2.1**). In addition, the implementation of Alternative 1 would include the use of one of the existing wharfs to exhibit decommissioned USCG vessels. Currently, there is no foreseeable plan for dredging the area in order to allow larger vessels, such as the USCG Barque Eagle, to dock at the wharf. Thus, only vessels up to 250 ft in length, drawing up to 20 ft, are foreseeable at the site for exhibit. The USCG has determined that the Proposed Action is consistent, to the maximum extent practicable, with the enforceable policies of the CCMA.

No indirect, construction-related impacts to surface or groundwater resources would be anticipated due to implementation of Alternative 1, provided that the measures described in **Section 5.6.6** are implemented to control the indirect impacts of soil erosion and sedimentation. Indirect, operational impacts resulting from stormwater runoff would be anticipated due to the implementation of Alternative 1, unless the measures described in **Section 5.6.6** are employed.

No jurisdictional wetlands or surface waters are located within the project study area. Therefore, no construction-related and/or operational impacts to these water resources would be anticipated. Based on the LOMR-F, approved by FEMA on 11 July 2005, portions of Parcel 1 are located in a 100-year floodplain (i.e., Special Flood Hazard Area); however, the construction footprint will not be within the 100-year floodplain as described in **Section 5.6.6**. No impacts to the floodplain would be anticipated due to the implementation of Alternative 1,



provided that the mitigation measures described in **Section 5.6.6** are implemented to control the indirect impacts.

5.6.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Overall, no significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 2. Although Parcel 1A is located within the coastal boundary, it is not a waterfront property. Implementation of Alternative 2 may limit water-dependent commercial, industrial and recreational uses, resulting in a minor adverse impact (developed shoreline). The USCG has determined that the Proposed Action is consistent, to the maximum extent practicable, with the enforceable policies of the CCMA.

No indirect, construction-related impacts to surface, or groundwater resources would be anticipated due to implementation of Alternative 2, provided that the measures described in **Section 5.6.6** are implemented to control the indirect impacts of soil erosion and sedimentation. Also, indirect, operational impacts resulting from stormwater runoff would be anticipated due to the implementation of Alternative 2, unless the measures described in **Section 5.6.6** are employed.

No jurisdictional wetlands or surface waters are located within the project study area. Therefore, no construction-related and/or operational impacts to these water resources would be anticipated. Based on the LOMR-F, approved by FEMA on 11 July 2005, a small portion of Parcel 1A is located in a 100-year floodplain (i.e., Special Flood Hazard Area); however, the construction footprint will not be within the 100-year floodplain as described in **Section 5.6.6**. Therefore, no impacts to the floodplain would be anticipated due to the implementation of Alternative 2.

5.6.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Overall, no significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 3. Although Parcel 4A is located within the coastal boundary, it is not a waterfront property. The USCG has determined that the Proposed Action is consistent, to the maximum extent practicable, with the enforceable policies of the CCMA.

No indirect, construction-related impacts to surface, or groundwater resources would be anticipated due to implementation of Alternative 3, provided that the measures described in **Section 5.6.6** are implemented to control the indirect impacts of soil erosion and sedimentation. Also, indirect, operational impacts resulting from stormwater runoff would be anticipated due to the implementation of Alternative 3, unless the measures described in **Section 5.6.6** are employed.

According to the NWI map, there are no jurisdictional wetlands located within the project study area; however, during the 11 October 2007 site reconnaissance a potential freshwater wetland was identified in the southwest corner. Therefore, a survey to identify and delineate the potential wetland is recommended. In addition, according to FEMA the southwest corner of Parcel 4A is located in a 100-year floodplain (i.e., Special Flood Hazard Area). However, no impacts to the floodplain or potential freshwater wetland would be anticipated due to the implementation of Alternative 3, provided that the measures described in **Section 5.6.6** are implemented to control the indirect impacts.



5.6.4 Effects of Alternative 4 (Riverside Park)

No adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 4. The USCG has determined that the Proposed Action is consistent, to the maximum extent practicable, with the enforceable policies of the CCMA.

No direct or indirect, construction-related and/or operational impacts to surface, or groundwater resources would be anticipated due to implementation of Alternative 4, provided that the measures described in **Section 5.5.5** are implemented to control the indirect impacts of soil erosion and sedimentation. Also, indirect, operational impacts resulting from stormwater runoff would be anticipated due to the implementation of Alternative 4, unless the measures described in **Section 5.6.6** are employed.

No jurisdictional wetlands or surface waters are located within the project study area; therefore, no construction-related and/or operational impacts to these water resources would be anticipated. Based on FEMA Floodplain maps, Riverside Park is not located in a 100-year floodplain. Therefore, no impacts to the floodplain would be anticipated due to the implementation of Alternative 4.

5.6.5 Effects of Alternative 5 (No Action Alternative)

No impacts to coastal and/or water resources are currently occurring due to the operation of the existing museum; therefore, no impacts would be anticipated as a result of the continued operation within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. As a result, there would be no ground disturbance associated with implementation of this alternative.

Further, it is reasonably foreseeable that no significant impacts to coastal and/or water resources would occur as a result of the development/improvements at Parcel 1, 1A, 4A, or Riverside Park. However, the development of Parcel 1 may limit water-dependent commercial, industrial and recreational uses, resulting in a minor adverse impact (developed shorefront).

5.6.6 Mitigation/Management Measures

As described in **Section 5.5.6**, a detailed, site-specific E&S Control Plan should be implemented to control the indirect impacts of soil erosion and sedimentation.

The implementation of the Proposed Action would be performed in compliance with EO 11988, *Floodplain Management*. In accordance with EO 11988, the USCG would avoid floodplains to the maximum extent practicable, through the design footprint, and limit indirect impacts. Thus, with the implementation of Alternative 1, Alternative 2, or Alternative 3, the floodplain and potential freshwater wetland that is located within the southwest portion of Parcel 4A (Alternative 3) should be avoided in the design footprint of the new National Museum to limit any direct or indirect impacts.

Furthermore, implementation of the Proposed Action would be performed in compliance with Section 307 of the CZMA and the CCMA, to the maximum extent practicable. In accordance with CGS section 22a-105(c) of the CCMA, the USCG is required to submit a Coastal Site Plan Review Application, prior to construction, to obtain a consistency determination. The USCG



must provide the same level of accessibility for water dependence uses as described in the Fort Trumbull MDP and in **Section 4.6.2.1**.

Additionally, to mitigate any indirect, operational impacts to less-than-significant, the CTDEP recommends a series of stormwater management BMPs be set in place (CTDEP 2007). These BMPs include both structural and non-structural BMPs, including the utilization of one or more of the following measures:

- The use of previous pavement (which is very compatible for parking lot applications), or impervious pavement without curbs, to promote sheet flow of stormwater runoff.
- The use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs and parking lots).
- The minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface.
- If soil conditions permit, the use of dry wells to manage runoff from the building roofs.
- The installations of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation.
- The installations and use of catch basins, gross particle separators, deep sump catch basins fitted with passive skimmers, and/or detention/retention basins.

Further, portions of Parcel 1 and 1A were previously identified as Area B of the *Fort Trumbull MDP*, and Area A, Parcel F of the former NUWC. The specific requirements for the Remedial Action Plan (RAP) shall be met, by the NCGMA prior and during construction, as applicable (refer to **Section 5.11.6**). In addition, an evaluation must be conducted to determine if the site is subject to the requirements of the Property Transfer Act pursuant to Section 22a-134 of the Connecticut General Statutes.

5.7 Biological Resources

5.7.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Implementation of Alternative 1 would result in less-than-significant biological resource impacts. AMEC personnel conducted a review utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Parcel 1 is not located within a special habitat area, does not contain special status species, and does not contain sensitive vegetative resources (see **Section 4.7.2**). It is possible that less-than-significant impacts to migratory birds would result due to the close proximity to the Thames River. Implementation of Alternative 1 would not result in the substantial removal of vegetation, since Parcel 1 was previously cleared of vegetation.

5.7.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Impacts to biological resources due to implementation of Alternative 2 would be identical to those described in **Section 5.7.1**.



5.7.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Impacts to biological resources due to implementation of Alternative 3 would be identical to those described in **Section 5.7.1**.

5.7.4 Effects of Alternative 4 (Riverside Park)

AMEC personnel conducted a review utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Riverside Park is not located within a special habitat area, does not contain special status species, and does not contain sensitive vegetative resources (see **Section 4.7.5**). However, it is possible that impacts to migratory birds, disturbance to wildlife, and disturbance to vegetation communities would result due to the implementation of the Proposed Action. Implementation of Alternative 4 would result in the removal of existing vegetation within the construction footprint during site preparation for the proposed project components. Removal of plant communities and habitat, and consequential displacement of animal species, would result in a direct, minor, long-term adverse impact to biological resources within the Riverside Park area.

5.7.5 Effects of Alternative 5 (No Action Alternative)

No significant impacts to biological resources would be anticipated as a result of the implementation of Alternative 5. The existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. Therefore, no significant adverse impacts to sensitive vegetation resources, special status species, or special habitat areas would be anticipated.

Further, it is reasonably foreseeable that less-than-significant biological resource impacts would result due to the construction/improvements at Parcel 1 and Riverside Park. According to the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps, neither Parcel 1 nor Riverside Park are located within a special habitat area, contain special status species, or contain sensitive vegetative resources. However, it is possible that less-than-significant impacts to migratory birds would result due to the close proximity to the Thames River.

5.7.6 Mitigation/Management Measures

Construction-related impacts to migratory birds, such as disturbance to nesting individuals, could occur due to implementation of Alternatives 1, 2, 3 and 4. Additionally, the disturbance to wildlife and disturbance to vegetation communities could occur as a result of the implementation of Alternative 5.

Recommended mitigation/management measures that would reduce the adverse, short- and long-term negative biological resource impacts to less-than-significant levels include:

- Avoiding special-status species and/or habitat for these species during construction activities.
- Capturing individual animal species from within the project construction area prior to construction and relocating them to other suitable habitat.



- Relocating individual plant species from within the project construction area to other suitable habitat prior to construction activities.
- Performing construction activities outside of the nesting and breeding season.
- Monitoring for these species during facility construction and operation.
- Fencing the perimeter of the project study area with appropriate gauge fencing to keep specimens outside of the project study area.
- Incorporating design elements, such as dust control or limitation of lighting, to minimize indirect operational impacts to the species.
- Furthermore, should special status species be identified within the proposed area of disturbance, the NCGMA/USCG should, prior to initiation of any construction, formally consult with the CTDEP to develop a mutually acceptable plan to minimize impacts to these species during and after construction. The plan may include those measures as identified above and would also address coordination and reporting requirements. This would ensure that all involved parties are regularly informed of the status of plan implementation and contingency plans to address any impacts that may occur during implementation of the plan. Implementation of these mitigation/management measures will reduce the impact to any special status species to less-than-significant levels.

5.8 Cultural Resources

The USCG initiated the IICEP process with the Connecticut SHPO and the Office of Connecticut State Archaeology, on 11 December 2006 and 24 January 2008, to obtain information regarding known cultural resource sites at or in the vicinity of the five proposed alternative study areas. Further, the USCG initiated consultation in accordance with Section 106 of the NHPA and under 36 CFR Part 800, *Protection of Historic Properties (Section 106 implementing regulations)*. Information obtained from the Connecticut SHPO and the Office of Connecticut State Archaeology is presented in the subsections below.

5.8.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Due to the lack of existence of NRHP-listed structures, the previously disturbed nature of Parcel 1, and the distance to Fort Trumbull State Park, implementation of Alternative 1 does not have the potential to cause direct adverse effects on historic properties.

There is the potential for moderate, indirect adverse visual effects to historic Fort Trumbull and the historic district from the construction of the museum depending on the final design of the museum; however, the potential for adverse effects is mitigated to a level of insignificance by the USCG and NCGMA who have signed a MOA (see **Appendix F**) stating that the museum's "building design must be approved by Connecticut SHPO and the Office of Long Island Sound Programs, CTDEP" (USCG 2002b). The USCG and NCGMA will work with the SHPO to ensure that the museum is designed in a way that is compatible with the historic resources nearby.

The USCG is also committed to completing compliance with NHPA, Section 106, prior to any final action being taken on construction or acceptance of the land and museum by the USCG. The USCG has been in contact with the Connecticut SHPO regarding compliance with Section



106 with regard to the proposed museum. The Connecticut SHPO has stated that it is too early to begin the 106 process, and welcomes initiation of the process at a later date when more details on possible design options become available.

Previous archeological investigation of the *Fort Trumbull MDP* indicates that no potentially significant archeological resources are located in Parcel 1 (Milone & MacBroom *et al.* 1998). The Connecticut SHPO has concurred with NLDC that the *Fort Trumbull MDP* will have no significant adverse effect upon the archeological heritage of Connecticut (Maddox 2001).

Long-term, positive impacts to USCG artifacts would be anticipated as a result of the implementation of Alternative 1, due to proper preservation, storage, display and interpretation of artifacts. Under this alternative, the USCG would acquire and operate a new National Museum large enough to provide adequate space for exhibits and proper storage/preservation of artifacts. In addition, artifacts would be stored properly, and would not be placed either in inadequate storage facilities or on loan at other institutions. Furthermore, the USCG's rich maritime history would be adequately displayed, interpreted, and communicated to the public.

5.8.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Cultural Resource impacts associated with Alternative 2 would be identical to those described in **Section 5.8.1**.

5.8.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Cultural Resource impacts associated with Alternative 3 would be identical to those described in **Section 5.8.1**.

5.8.4 Effects of Alternative 4 (Riverside Park)

Riverside Park does not contain any currently NRHP-listed structures. However, due to the age of the surrounding neighborhoods, a number of structures near the park could be eligible for NRHP-listing. Further, because of historic Native American or Colonial American settlement patterns, Riverside Park possesses moderate to high sensitivity for prehistoric and historic archaeological resources. Moderate adverse impacts on historic areas would be anticipated.

Long-term, positive impacts to USCG artifacts would be anticipated as a result of the implementation of Alternative 4, due to proper preservation, storage, display and interpretation of artifacts. Under this alternative, the USCG would acquire and operate a new National Museum large enough to provide adequate space for exhibits and proper storage/preservation of artifacts. In addition, artifacts would be stored properly, and would not be placed either in inadequate storage facilities or on loan at other institutions. Furthermore, the USCG's rich maritime history would be adequately displayed, interpreted, and communicated to the public.

5.8.5 Effects of Alternative 5 (No Action Alternative)

No direct impacts to archaeological or architectural resources would be anticipated as a result of the implementation of Alternative 5. The existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned



under this alternative for the foreseeable future; therefore, no direct adverse impacts to historic and archaeological resources would be anticipated.

However, under this alternative, indirect, moderate adverse impacts to historic resources (i.e., USCG artifacts) would be anticipated. The current substandard conditions of the USCG Museum, located within Waesche Hall of the USCG Academy, would remain. This includes a lack of adequate space for exhibits and proper storage/preservation of artifacts. In addition, artifacts would continue to be stored improperly, either in inadequate storage facilities, or on loan at other institutions. It is possible that these artifacts could deteriorate over time. Furthermore, the USCG's rich maritime history would continue to be inadequately displayed, interpreted, and communicated to the public, thus limiting public education opportunities.

Further, it is reasonably foreseeable that the development of the hotel and conference center on Parcel 1 does not have the potential to cause direct adverse effects on historic properties. However, moderate, indirect adverse visual effects are anticipated upon important historic properties in the vicinity. In addition, it is reasonably foreseeable that improvements to Riverside Park would result in moderate adverse impacts on historic areas, due to the moderate to high sensitivity for prehistoric and historic archaeological resources.

5.8.6 Mitigation/Management Measures

The Connecticut SHPO recommends the following mitigation/management measures to reduce the anticipated adverse cultural resource impacts to less-than-significant levels:

- **Alternative 1, 2 and 3** - To manage indirect visual effects upon important historic properties, it is recommended that consultation with and preliminary design plans be submitted to the Connecticut State Historic Preservation Office for review and comment.
- **Alternative 4** - It is recommended that a professional reconnaissance survey be undertaken, in accordance with the *Environmental Review Primer for Connecticut's Archaeological Resources*, to identify and evaluate any archaeological resource which may exist within proposed project limits, including, equipment storage and associated work areas. In addition, no ground disturbance or construction-related activities should be initiated until the Connecticut State Historic Preservation Office has had an opportunity to review and comment upon the recommended archaeological survey report.

Further, in the case of an inadvertent discovery of prehistoric or historic period archeological materials during site construction activities, it is recommended that construction activities at that particular location stop, and the Connecticut SHPO be contacted for further information and direction for compliance to the Archaeological and Historical Preservation Act (16 USC 469).

5.9 Socioeconomics

5.9.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

Implementation of Alternative 1 would likely require utilization of regional contractors for construction of the proposed new National Museum. Hiring regional contractors could provide



jobs and revenue to local/regional residents. If regional contractors are utilized, this would constitute a direct, minor, short-term positive impact to the regional economy.

Once the new National Museum has been completed and donated to the USCG, approximately 30 full-time and part-time employees would be hired for operational purposes. This would lead to an approximate 200,000 persons per year visiting the New London area, which would constitute a direct, minor, long-term positive impact to the regional economy.

Under Alternative 1, the Proposed Action would be implemented within a previously disturbed, non-residential area. No impact to the regional population would be anticipated.

Less-than-significant tax related impacts would be anticipated as a result of the implementation of Alternative 1, specifically the potential loss of tax revenue from the proposed hotel and conference center, as identified in the *Fort Trumbull MDP*. Should the proposed new National Museum be located within Parcel 1, the proposed hotel and conference center would be located elsewhere within the Fort Trumbull area, as appropriate. The relocation of the proposed hotel and conference center could generate less economic tax revenue since the current *Fort Trumbull MDP* proposes the hotel/conference center on a 9.4 acre parcel of taxable property. The implementation of Alternative 1 would require a minor modification to the *Fort Trumbull MDP*, in order to relocate the proposed hotel and conference center to another parcel within the Fort Trumbull area.

As discussed in **Section 4.9**, Parcel 1 was previously the former NUWC and owned by the U.S. Navy; therefore, Parcel 1 was not a tax generating property. With the proposed new National Museum, the property will be donated and subsequently owned by the USCG and therefore also tax exempt; with the exception of the proposed gift shop and dining facilities proposed for inclusion in the design of the museum.

Currently the New London Seafood Distributors, a commercial fishing enterprise, utilize the wharf owned by the NLDC and located in the northern portion of Parcel 1. The NLDC is currently working with the New London Seafood Distributors in the identification and relocation of docking locations, as described in the *Fort Trumbull MDP* and prescribed under Chapter 135 of the Connecticut General Statutes. The transfer of the New London Seafood Distributors is a result of the increasing space limitations for the loading and unloading process and the limited truck access, and is not directly related to the proposed acquisition or operation of the new National Museum. Thus, no socioeconomic impacts are anticipated due to implementation of Alternative 1, as the relocation is already underway.

Additionally, no socioeconomic impacts in Forestville, Maryland, would be anticipated as a result of Alternative 1 since the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.9.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Implementation of Alternative 2 would likely require utilization of regional contractors for construction of the proposed new National Museum. Hiring regional contractors could provide jobs and revenue to local/regional residents. If regional contractors are utilized, this would constitute a direct, minor, short-term positive impact to the regional economy.



Once the new National Museum has been completed and donated to the USCG, approximately 30 full-time and part-time employees would be hired for operational purposes. This would lead to an approximate 200,000 persons per year visiting the New London area, which would constitute a direct, minor, long-term positive impact to the regional economy.

Under Alternative 2, the Proposed Action would be implemented within a previously disturbed, non-residential area. No impact to the regional population would be anticipated.

No tax related impacts would be anticipated as a result of the implementation of Alternative 2. As discussed in **Section 4.9**, Parcel 1A was previously the NUWC and owned by the U.S. Navy; therefore, Parcel 1 was not a tax generating property. Further, the implementation of Alternative 2 is consistent with the *Fort Trumbull MDP*.

Additionally, no socioeconomic impacts in Forestville, Maryland, would be anticipated as a result of Alternative 2 since the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.9.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

Implementation of Alternative 3 would likely require utilization of regional contractors for construction of the proposed new National Museum. Hiring regional contractors could provide jobs and revenue to local/regional residents. If regional contractors are utilized, this would constitute a direct, minor, short-term positive impact to the regional economy.

Additionally, once the new National Museum has been completed and donated to the USCG, approximately 30 full-time and part-time employees would be hired for operational purposes. This would lead to an approximate 200,000 persons per year visiting the New London area, which would constitute a direct, minor, long-term positive impact to the regional economy.

Furthermore, under this alternative, the Proposed Action would be implemented within a previously disturbed, currently unutilized, non-residential area. Prior to the land acquisition by the NCGMA, the residential buildings currently found within the boundaries of Parcel 4A shall be demolished and the site graded as discussed in **Section 5.2.3**. No impact to the regional population would be anticipated.

No tax related impacts are anticipated as a result of the implementation of Alternative 3. Although Parcel 4A has previously generated tax revenue, the revitalization of the Fort Trumbull area will generate approximately double the total amount of total revenue collected prior to NLDC ownership. As a result, the implementation of Alternative 3 will have no impact on the tax revenue collected within the Fort Trumbull area. Additionally under this alternative, Parcel 1 would be developed into the proposed hotel and conference center causing the entire parcel to generate more tax revenue than would be collected at Parcel 4A, creating a minor, positive socioeconomic impact.

Additionally, no socioeconomic impacts in Forestville, Maryland, would be anticipated as a result of Alternative 3 since the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.



5.9.4 Effects of Alternative 4 (Riverside Park)

Implementation of Alternative 4 would likely require utilization of regional contractors for construction of the proposed new National Museum. Hiring regional contractors could provide jobs and revenue to local/regional residents. If regional contractors are utilized, this would constitute a direct, minor, short-term positive impact to the regional economy.

Additionally, once the new National Museum has been completed and donated to the USCG, approximately 30 full-time and part-time employees would be hired for operational purposes. This would lead to an approximate 200,000 persons per year visiting the New London area, which would constitute a direct, minor, long-term positive impact to the regional economy.

Furthermore, under this alternative, the Proposed Action would be implemented within a municipal park. No impact to regional population would be anticipated.

No tax related impacts are anticipated as a result of the implementation of Alternative 4. Riverside Park is currently owned and operated by the City of New London and, therefore, does not generate tax revenue. With the implementation of Alternative 4, Riverside Park would be owned by the USCG and would also not generate any tax revenue for the State of Connecticut or the City of New London.

A long-term, minor economic impact due to the implementation of Alternative 4 may occur to businesses located within the downtown area of New London, as visitors to the new National Museum would be directed away from downtown New London.

In addition, no socioeconomic impacts in Forestville, Maryland, would be anticipated as a result of Alternative 4 since the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.9.5 Effects of Alternative 5 (No Action Alternative)

Under this alternative, the existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. On average, only 20,000 persons per year, as compared to the potential 200,000 persons per year would visit the USCG Museum, resulting in minor, negative impact to the regional economy.

Additionally, no change in the population and no new employment would be realized due to the continued operation of the museum within Waesche Hall. The current USCG Museum would continue to employ one full-time employee, and no new employment would occur. As a result of the implementation of Alternative 5, a less-than-significant impact to the regional employment would be anticipated.

Further, it is reasonably foreseeable that the development of the hotel and conference center on Parcel 1 would result in direct, minor positive impacts to the regional economy due to construction and operation. In addition, it is reasonably foreseeable that potential improvements to Riverside Park would result in direct, minor, short-term positive impacts to the regional economy due to the use of regional contractors. No significant impact to regional population would be anticipated.



No tax related impacts are anticipated as a result of the implementation of Alternative 5. The current USCG Museum is located within the USCG Academy property which does not generate tax revenue. With the implementation of Alternative 5, the current USCG Museum would continue to operate at the USCG Academy.

Additionally, no socioeconomic impacts in Forestville, Maryland, would be anticipated as a result of Alternative 5 since the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.9.6 Mitigation/Management Measures

No socioeconomic-related mitigation/management measures would be required as a result of the implementation of any of the five proposed alternatives.

5.10 Environmental Justice

5.10.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

No disproportionate impacts to minority populations would occur as a result of the implementation of Alternative 1. As described in **Section 4.10.1**, the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut; however, the proposed action does not involve the displacement of any of these minorities.

Additionally, no disproportionate impacts to minority or low-income populations in Forestville or Prince George's County, Maryland, would be anticipated to occur as a result of the implementation of Alternative 1 as the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.10.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

Environmental Justice related impacts associated with Alternative 2 would be identical to those described in **Section 5.10.1**

5.10.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

No disproportionate impacts to minority populations would occur as a result of the implementation of Alternative 3. As described in **Section 4.10.1**, the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut; however, the proposed action does not involve the displacement of any of these minorities.

Additionally, no disproportionate impacts to minority or low-income populations in Forestville or Prince George's County, Maryland, would be anticipated to occur as a result of the implementation of Alternative 3 as the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

As discussed in **Sections 1.1.2** and **4.1.4**, the 2005 Supreme Court case, *Susette Kelo, et. al. v. City of New London, Connecticut et. al.* (545 U.S. 469) concluded that the residents of Parcel 4A within the Fort Trumbull area were justly compensated for their property by the City of New



London. Further, the eminent domain proceedings were not related to the USCG. The decision by the City of New London to exercise its power of eminent domain was not influenced by the USCG or the proposal by the NCGMA to construct a new National Museum. No disproportionate environmental justice impacts would be anticipated as a result of the implementation of Alternative 3.

5.10.4 Effects of Alternative 4 (Riverside Park)

No disproportionate impacts to minority populations, low-income populations, or Native American tribes would occur as result of the implementation of Alternative 4. Although there are a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut, the implementation of Alternative 4 would not involve the displacement of any of these minorities.

Additionally, no disproportionate impacts to minority or low-income populations in Forestville or Prince George's County, Maryland, would be anticipated to occur as a result of the implementation of Alternative 4 as the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation.

5.10.5 Effects of Alternative 5 (No Action Alternative)

Under this alternative, the existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. The operation of the existing museum does not impact any minority, low-income or Native American populations. Therefore, no environmental justice impacts would be anticipated as a result of the continued operation.

With the implementation of Alternative 5, the Coast Guard Exhibit Center in Forestville, Maryland, would remain in operation; therefore, no disproportionate impacts to minority or low-income populations would be anticipated.

Further, it is reasonably foreseeable that no disproportionate impacts to minority populations, low-income populations, or Native American tribes would occur as a result of the construction/improvements at Parcel 1, 1A, 4A or Riverside Park. As described in **Section 4.10**, the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut; however, the proposed activities do not involve the displacement of any of these minorities. Mitigation/Management Measures

No environmental justice-related mitigation/management measures would be required as a result of the implementation of any of the five proposed alternatives.



5.11 Infrastructure

5.11.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

5.11.1.1 Utility Infrastructure

Less-than-significant construction-related and/or operational impacts to water supply or sewer service would be anticipated due to implementation of Alternative 1. No construction-related impacts to electric, telephone, or solid waste utilities would be anticipated due to implementation of Alternative 1. The utility infrastructure in the vicinity of Parcel 1 has been updated to accommodate the proposed development.

Less-than-significant operational impacts to water and sewer services, gas and electric, telephone, and solid waste utilities would be anticipated due to implementation of Alternative 1. These impacts would be anticipated based on the additional load that would be placed on the aforementioned utilities. However, based on the overall capacity of these utilities, and on the small number of expected employees at the new National Museum, the anticipated new load would result in a less-than- substantial increase.

5.11.1.2 Transportation Infrastructure

Minor, short-term adverse, construction-related impacts to transportation infrastructure would be anticipated due to implementation of Alternative 1. Construction of the proposed new National Museum would involve the temporary increase in vehicular traffic and the presence of large, slow-moving construction vehicles.

Less-than-significant operational impacts to transportation infrastructure would be anticipated due to implementation of Alternative 1. These impacts would be anticipated based on the additional traffic volume in the vicinity of the project study area, due to the number of visitors to the new National Museum. The Traffic Impact Study prepared in March 2001 concludes that the MDP, which encompasses a proposed museum, would not generate significant impacts during peak-hour traffic to either the Fort Trumbull area or roadways in the vicinity of the Fort Trumbull area once the suggested traffic and roadway improvements are completed (Brooks 2007, Wilbur Smith 2001). Additionally, the study specifies that the roadway system, with the improvements suggested, under construction and previously conducted, would assist in maintaining an acceptable level of traffic volume during the operation of the *Fort Trumbull MDP* project (Brooks 2007, Wilbur Smith 2001). The expected increase in vehicular traffic would result in a less-than-substantial increase as a result of the implementation of Alternative 1.

5.11.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

5.11.2.1 Utility Infrastructure

Utility infrastructure impacts associated with Alternative 2 would be identical to those described in **Section 5.11.1.1**.

5.11.2.2 Transportation Infrastructure

Transportation infrastructure impacts associated with Alternative 2 would be identical to those described in **Section 5.11.1.2**.



5.11.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

5.11.3.1 Utility Infrastructure

Utility infrastructure impacts associated with Alternative 3 would be identical to those described in **Section 5.11.1.1**. Prior to acquisition of land by the NCGMA, the utility infrastructure in the vicinity of Parcel 4A shall be updated, as prescribed in the *Fort Trumbull MDP*.

5.11.3.2 Transportation Infrastructure

Transportation infrastructure impacts associated with Alternative 3 would be identical to those described in **Section 5.11.1.2**. Prior to acquisition of land by the NCGMA, the transportation infrastructure in the vicinity of Parcel 4A shall be updated, as prescribed in the *Fort Trumbull MDP*.

5.11.4 Effects of Alternative 4 (Riverside Park)

5.11.4.1 Utility Infrastructure

Less-than-significant construction-related and/or operational impacts to water supply or sewer service would be anticipated due to implementation of Alternative 4. No construction-related impacts to electric, telephone, or solid waste utilities would be anticipated due to implementation of Alternative 4. Utility infrastructure is present within the Riverside Park area and the utilities would be able to handle the additional load as a result of the construction of the proposed new National Museum.

Less-than-significant operational impacts to water and sewer services, gas and electric, telephone, and solid waste utilities would be anticipated due to implementation of Alternative 4. These impacts would be anticipated based on the additional load that would be placed on the aforementioned utilities. However, based on the overall capacity of these utilities, and on the small number of expected employees at the new National Museum, the anticipated new load would result in a less-than- substantial increase.

5.11.4.2 Transportation Infrastructure

Minor, short-term adverse, construction-related impacts to transportation infrastructure would be anticipated due to implementation of Alternative 4. Construction of the proposed new National Museum would involve the temporary increase in vehicular traffic and the presence of large, slow-moving construction vehicles.

Minor adverse operational impacts to transportation infrastructure would be anticipated due to implementation of Alternative 4, if the measures described in **Section 5.11.6** are carried out. These impacts would be anticipated based on the additional traffic volume in the vicinity of the project study area, due to the number of visitors to the new National Museum, and the inadequate transportation infrastructure of the Riverside Park area.

5.11.5 Effects of Alternative 5 (No Action Alternative)

Under this alternative, the existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this



alternative for the foreseeable future. Therefore, minor, less-than-significant impacts to infrastructure would continue as a result of the approximate 20,000 visitors per year.

Further, it is reasonably foreseeable that the construction/improvements at Parcel 1, 1A, 4A and Riverside Park would result in less-than-significant construction-related and/or operational impacts to the utility infrastructure. However, minor adverse impacts to transportation infrastructure would result due to the increased traffic from construction and operation of the proposed facilities.

5.11.6 Mitigation/Management Measures

Prior to the performance of any activities involving digging, drilling, grading, or other subsurface disturbance activity, the USCG should contact Connecticut One-Call. The Regulations of Connecticut State Agencies Section 16-345-1 through 16-345-7, requires the notification of Connecticut One-Call whenever any activities involving digging, drilling, grading, or other subsurface disturbance activity is performed. This service is used to notify utilities that may have underground utility lines or equipment within a specified work area. As an added measure, the USCG should review plans with City of New London to identify any additional city-owned underground utilities.

Mitigation/management measures that would reduce the adverse transportation impacts, associated with Alternative 4, to less-than-significant levels include:

- Performing a Traffic Impact Study to determine the level of impact.
- Depending on the final square footage of the new National Museum a Certificate of Safe Traffic Operations may be required through the Connecticut Department of Transportation (ConnDOT) and the State Traffic Commission (STC). The Certificate is required for buildings over 100,000 square ft in size, which is not proposed at the present time.
- Updating the transportation infrastructure within the Riverside Park area to compensate for the anticipated additional vehicular traffic.

5.12 Hazardous and Toxic Materials/Wastes

5.12.1 Effects of Alternative 1 (Parcel 1: Fort Trumbull Area)

No construction or operational hazardous and toxic waste impacts are anticipated due to implementation of Alternative 1. Historically spills and leaks have occurred within Parcel 1 of the Fort Trumbull area, the former location of the NUWC. However, previous remedial activities, in accordance with the Connecticut Remedial Standard Regulations, resulted in soil remaining on-site that exceeds direct exposure criteria (CTDEP 2007). According to NLDC representatives and the CTDEP, approximately 4 ft of clean fill was placed on the site in an effort to render these soils inaccessible. In order to ensure continued compliance with the Connecticut Remediation Standard Regulations, the NLDC and/or the developer must submit a Development RAP for the CTDEP's review and approval prior to construction (CTDEP 2007). Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes.



However, the event of a spill during construction activities would result in direct, minor, short-term adverse impacts to site conditions.

5.12.2 Effects of Alternative 2 (Parcel 1A: Fort Trumbull Area)

HTMW impacts associated with Alternative 2 would be identical to those described in **Section 5.12.1**.

5.12.3 Effects of Alternative 3 (Parcel 4A: Fort Trumbull Area)

No construction or operational hazardous and toxic waste impacts are anticipated due to implementation of Alternative 3. There have been no known spills and leaks within Parcel 4A of the Fort Trumbull area. Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes.

As indicated in **Section 4.12.3.5**, a Phase I Environmental Site Assessment was performed at Parcel 4A, and indicated that no serious issues beyond the presence of widespread urban fill, which is expected to have contaminants exceeding the State of Connecticut Direct Exposure Criteria. Prior to the NCGMA's acquisition of Parcel 4A, a Phase II Environmental Assessment would be required and soil remediation shall be performed, as applicable.

The event of a spill during construction activities would result in direct, minor, short-term adverse impacts to site conditions.

5.12.4 Effects of Alternative 4 (Riverside Park)

No construction or operational hazardous and toxic waste impacts are anticipated due to implementation of Alternative 4. According to City of New London personnel, no hazardous and/or toxic wastes have been stored within Riverside Park. Furthermore, there is no existing data to suggest that there are any historic HTMW concerns at Riverside Park. Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes.

However, the event of a spill during construction activities would result in direct, minor, short-term adverse impacts to site conditions.

5.12.5 Effects of Alternative 5 (No Action Alternative)

Under this alternative, the existing museum would continue to be operated within Waesche Hall of the USCG Academy. No new construction or museum expansion is planned under this alternative for the foreseeable future. Therefore, no hazardous and toxic waste impacts would be expected as a result of the implementation of Alternative 5, since the USCG Museum does not currently produce and/or store hazardous or toxic wastes.

Further, it is reasonably foreseeable that no construction or operational hazardous and toxic waste impacts would result from the construction/improvement of Parcel 1 or Riverside Park. Neither the operation of the proposed hotel and conference center nor the improvement of Riverside Park would require the storage of hazardous and/or toxic wastes.



5.12.6 Mitigation/Management Measures

The event of a spill during construction and/or museum operation activities would result in direct, minor, short-term adverse impacts to site conditions. In the event of a spill during construction and/or museum operation activities, the contractor and/or museum personnel should immediately contact the local fire department. USCG personnel should contact state agencies as required for spills.

5.13 Cumulative Impacts

This section addresses the cumulative effects of the Proposed Action. Cumulative effects are defined by the CEQ in 40 CFR 1508.7 as:

“Impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”

CEQ regulations also state that addressed cumulative impacts should not be limited to those from actual proposals, but must include impacts from actions being contemplated or that are reasonably foreseeable.

Adverse impacts likely to result from implementation of the Proposed Action under Alternatives 1, 2, 3 and 4, as identified in **Sections 5.2** through **5.12**, include air quality and noise impacts during construction activities, water resources and biological resources impacts during construction and operation, unless the above-mentioned mitigation/management measures are implemented. Adverse impacts likely to result from the implementation of Alternative 5, as identified in **Sections 5.2** through **5.12**, include cultural resource impacts due to the improper storage and display of the USCG artifacts, and socioeconomic impacts due to lack of potential jobs and limited tourism.

The net positive impacts likely to result from implementation of the Proposed Action under Alternative 1, 2, 3 and 4, as identified in **Sections 5.2** through **5.12**, include positive impacts to the local economy.

5.13.1 Projects in the Vicinity of the Project Study Area

5.13.1.1 Parcel 1, 1A, and 4A: Fort Trumbull Area

Parcel 1B

With the implementation of Alternative 2, 3, 4, or 5, the NLDC in conjunction with the City of New London propose to construct a hotel and conference center immediately adjacent to Parcel 1A, as prescribed in the *Fort Trumbull MDP*. The hotel and conference center is proposed to be constructed on Parcel 1B, of the Fort Trumbull area, directly north of Parcel 1A. Parcel 1B is a waterfront property with access to the Thames River. The purpose of the hotel and conference center is to serve two functions for the City of New London and the Fort Trumbull area. The first function the hotel/conference center would serve is to provide a hotel and meeting room facility for the Pfizer Global Development facility located within the City of New London. The Pfizer



Corporation has made a commitment to utilize the hotel/conference center as part of their overall needs within the Fort Trumbull area. The second function is to provide a place for the visitors and tourists to the City of New London and southeastern Connecticut. The proposed project has been approved by the City of New London. This project is still in the planning stages. However, should Alternative 1 be implemented it is reasonably foreseeable that the proposed hotel and conference center will be relocated to another parcel within the Fort Trumbull area.

The hotel and conference center will contain 133 rooms, a 5,000 square foot conference space, a restaurant (175 seats), indoor pool and fitness facilities.

Potential impacts were assessed with regard to the aquatic and terrestrial ecosystems, threatened and endangered species, hazardous and toxic materials, cultural resources, and the general needs and welfare of the public. Identified impacts included (Milone & MacBroom *et al.* 1998):

- Generation of construction-related fugitive dust emissions, soil erosion, and noise.
- Increased traffic volume on Fort Trumbull area roadways.
- Additional storm water runoff due to an increased area of impervious surfaces.

Parcel 2A

The NLDC in conjunction with the City of New London propose to construct an apartment complex within Parcel 2A of the Fort Trumbull area, as prescribed in the *Fort Trumbull MDP*. Parcel 2A is a 1.7-acre parcel, located southeast of Parcel 1 along East Street. The proposed construction of the apartment complex has been approved by the City of New London (Brooks 2006).

Parcel 2B

The NLDC in conjunction with the City of New London propose to construct 14 townhouses within Parcel 2B of the Fort Trumbull area, as prescribed in the *Fort Trumbull MDP*. Parcel 2B is a one-acre parcel, located southeast of Parcel 1 along East Street. The proposed construction of the 14 townhouses has been approved by the City of New London (Brooks 2006).

Parcel 3A

The NLDC in conjunction with the City of New London propose to renovate an existing 88,000 square foot office building, as prescribed in the *Fort Trumbull MDP*. Parcel 3A is a 2.6-acre parcel, located immediately south of Parcel 1. The renovation of the office building is currently under negotiation (Brooks 2006).

Parcel 3B

The NLDC in conjunction with the City of New London propose to construct a 100,000 square foot office building within Parcel 3B of the Fort Trumbull area, as prescribed in the *Fort Trumbull MDP*. Parcel 3B is a 2.6-acre parcel, located south of Parcel 1 along Walbach Street and East Street. The proposed construction has not yet been permitted and is still in the planning stages (Brooks 2006).



Parcel 3C

The NLDC in conjunction with the City of New London propose to construct a 100,000 square foot office building within Parcel 3C of the Fort Trumbull area, as prescribed in the *Fort Trumbull MDP*. Parcel 3C is a 4.6-acre parcel, located southwest of Parcel 1 along Walbach Street and Nameaug Street. The proposed construction has not yet been permitted and is still in the planning stages (Brooks 2006).

5.13.1.2 Riverside Park

USCG Academy Expansion into Riverside Park

The USCG Academy has considered several opportunities for development within Riverside Park. The USCG Academy grounds are intensely developed with limited open space available for new construction. Riverside Park has been considered due to its proximity, size and potential availability. The USCG Academy prepared a FMP in 2006 which includes potential development within a portion of Riverside Park (USCG Academy 2006). The proposed expansion would include the northern portion of Riverside Park for the purposes of the USCG Academy, thus creating a smaller area for the proposed new National Coast Guard Museum.

Condominium Development

A 20-unit condominium development is currently being constructed at the intersection of Crystal Avenue and Williams Street, immediately adjacent to the USCG Academy (Smith 2006).

Warehouse

A 40,000 sq. ft. warehouse is proposed along State Pier Road. The proposed location is south of Riverside Park, on the south-side of I-95. The proposed location is approximately ¼-mile south of Riverside Park (Smith 2006).

5.13.1.3 USCG Academy

USCG Academy Expansion into Riverside Park

The USCG Academy has considered several opportunities for development within Riverside Park. The USCG Academy grounds are intensely developed with limited open space available for new construction. Riverside Park has been considered due to its proximity, size and potential availability. The USCG Academy prepared a FMP in 2006 which includes potential development within a portion of Riverside Park (USCG Academy 2006). The proposed expansion would include the northern portion of Riverside Park for the purposes of the USCG Academy, thus creating a smaller area for the proposed new National Coast Guard Museum.



5.13.2 Cumulative Impacts Associated with the New National Museum

5.13.2.1 Alternative 1 (Parcel 1: Fort Trumbull Area)

Air Quality

Implementation of Alternative 1 would result in direct, short-term adverse impacts associated with fugitive dust emissions caused by construction activities. These impacts would be mitigated to less-than-significant levels through the application of BMPs and dust control measures during construction activities and would not contribute to cumulative impacts. Thus, minor adverse, cumulative, air quality impacts would be anticipated as a result of the new National Museum and proposed projects within the vicinity of the project study area due to the increase in construction activities.

Noise

Minor, short-term adverse cumulative noise impacts would be anticipated as a result of the construction-related activities of the new National Museum and proposed projects within the vicinity of the project study area. Nearby businesses and residences would be expected to experience short-term noise impacts, due to multiple pieces of equipment operating concurrently.

Wetlands

No jurisdictional wetlands are present within Parcel 1. However, minor, indirect, cumulative impacts to wetlands would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project study area. Parcel 1 is located within close proximity to the Thames River, therefore, development may cause indirect wetland degradation.

Coastal Resources

No significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 1 in conjunction with the proposed projects in the vicinity. However, implementation of Alternative 1 and the proposed projects may limit water-dependent commercial, industrial and recreational uses, resulting in minor adverse impacts to developed shorefronts.

Surface Waters/Floodplains

No surface waters or floodplains are located within Parcel 1; therefore, no construction-related and/or operational impacts to these resources would be anticipated due to implementation of Alternative 1. No cumulative impacts to surface waters and/or floodplains would be anticipated.

Historic and Architectural Resources

Parcel 1 is located within close proximity to Fort Trumbull and the Downtown New London Historic District. Although Alternative 1 would have no direct impacts to any NRHP-listed structures, minor adverse cumulative impacts would be anticipated. Alternative 1 in conjunction with the proposed projects in the vicinity may cause indirect adverse visual impacts upon



important historic properties. Beneficial impacts to the Fort Trumbull area would result from the close proximity to the Fort Trumbull State Park, as a result of the common historic focus between the new National Museum and the Park.

Threatened and Endangered Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Parcel 1 is not located within a special habitat area. Impacts to threatened and endangered species, if present, would be managed to less-than-significant levels through the development of an acceptable plan to minimize impacts to these species, and would not contribute to cumulative impacts.

Socioeconomics

Implementation of Alternative 1 would result in minor, long-term, positive impacts to the regional economy of New London, Connecticut by providing construction and later jobs within the new National Museum. Positive cumulative impacts to the New London, Connecticut economy would be anticipated, due to the redevelopment of the Fort Trumbull area. Furthermore, positive cumulative socioeconomic impacts would be anticipated as a result of the new National Museum and other proposed projects within the vicinity of the Fort Trumbull area.

Cultural Resources

Implementation of Alternative 1 would result in minor, long-term, positive cumulative impacts to the Fort Trumbull area as a result of the close proximity of the proposed new National Museum and the Fort Trumbull State Park, as well as other proposed projects within the vicinity of the fort Trumbull area.

Environmental Justice

No cumulative environmental justice impacts would be anticipated as a result of the implementation of Alternative 1 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. Although the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut, the proposed action does not involve the displacement of any of these minorities.

Infrastructure

Implementation of Alternative 1 would result in less-than-significant utility infrastructure impacts and no cumulative impacts to utility infrastructure. Furthermore, implementation of Alternative 1 would result in minor, positive cumulative impacts to transportation infrastructure in the Fort Trumbull Area, due to road improvements. A minor increase in vehicular traffic on Smith, Walbach and Trumbull Streets may occur due to the number of visitors to the new National Museum, but this increase could be easily handled by the existing road capacity as determined by the, March 2001, *Traffic Impact Study Fort Trumbull MDP New London, Connecticut* (Wilbur Smith 2001).



Hazardous and Toxic Materials

No cumulative hazardous and toxic materials impacts would be anticipated as a result of the implementation of Alternative 1 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. Although historically spills and leaks have occurred within Parcel 1 of the Fort Trumbull area, all of the contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility and approximately 4 ft of clean fill was placed on the site. Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes. Further, it is not reasonably foreseeable that the proposed projects in the vicinity would require the storage of hazardous and/or toxic wastes.

5.13.2.2 Alternative 2 (Parcel 1A: Fort Trumbull Area)

Air Quality

Implementation of Alternative 2 would result in direct, short-term adverse impacts associated with fugitive dust emissions caused by construction activities. These impacts would be mitigated to less-than-significant levels through the application of BMPs and dust control measures during construction activities and would not contribute to cumulative impacts. Thus, minor adverse, cumulative, air quality impacts would be anticipated as a result of the new National Museum and proposed projects within the vicinity of the project study area due to the increase in construction activities.

Noise

Minor, short-term adverse cumulative noise impacts would be anticipated as a result of the construction-related activities of the new National Museum and proposed projects within the vicinity of the project study area. Nearby businesses and residences would be expected to experience short-term noise impacts, due to multiple pieces of equipment operating concurrently.

Wetlands

No jurisdictional wetlands are present within Parcel 1A. However, minor, indirect, cumulative impacts to wetlands would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project study area. Parcel 1A is located within close proximity to the Thames River, therefore, development may cause indirect wetland degradation.

Coastal Resources

No significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 2 in conjunction with the proposed projects in the vicinity. However, implementation of Alternative 2 and the proposed projects may limit water-dependent commercial, industrial and recreational uses, resulting in minor adverse impacts to developed shorefronts.



Surface Waters/Floodplains

No surface waters or floodplains are located within Parcel 1A; therefore, no construction-related and/or operational impacts to these resources would be anticipated due to implementation of Alternative 2. No cumulative impacts to surface waters and/or floodplains would be anticipated.

Historic and Architectural Resources

Parcel 1A is located within close proximity to Fort Trumbull and the Downtown New London Historic District. Although Alternative 2 would have no direct impacts to any NRHP-listed structures, minor adverse cumulative impacts would be anticipated. Alternative 2 in conjunction with the proposed projects in the vicinity may cause indirect adverse visual impacts upon important historic properties. Beneficial impacts to the Fort Trumbull area would result from the close proximity to the Fort Trumbull State Park, as a result of the common historic focus between the new National Museum and the Park.

Threatened and Endangered Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Parcel 1A is not located within a special habitat area. Impacts to threatened and endangered species, if present, would be managed to less-than-significant levels through the development of an acceptable plan to minimize impacts to these species, and would not contribute to cumulative impacts.

Socioeconomics

Implementation of Alternative 2 would result in minor, long-term, positive impacts to the regional economy of New London, Connecticut by providing construction and later jobs within the new National Museum. Positive cumulative impacts to the New London, Connecticut economy would be anticipated, due to the redevelopment of the Fort Trumbull area. Furthermore, positive cumulative socioeconomic impacts would be anticipated as a result of the new National Museum and other proposed projects within the vicinity of the Fort Trumbull area.

Cultural Resources

Implementation of Alternative 2 would result in minor, long-term, positive cumulative impacts to the Fort Trumbull area as a result of the close proximity of the proposed new National Museum and the Fort Trumbull State Park, as well as other proposed projects within the vicinity of the fort Trumbull area.

Environmental Justice

No cumulative environmental justice impacts would be anticipated as a result of the implementation of Alternative 2 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. Although the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut, the proposed action does not involve the displacement of any of these minorities.



Infrastructure

Implementation of Alternative 2 would result in less-than-significant utility infrastructure impacts and no cumulative impacts to utility infrastructure. Furthermore, implementation of Alternative 2 would result in minor, positive cumulative impacts to transportation infrastructure in the Fort Trumbull Area, due to road improvements. A minor increase in vehicular traffic on Smith, Walbach and Trumbull Streets may occur due to the number of visitors to the new National Museum, but this increase could be easily handled by the existing road capacity as determined by the, March 2001, *Traffic Impact Study Fort Trumbull MDP New London, Connecticut* (Wilbur Smith 2001).

Hazardous and Toxic Materials

No cumulative hazardous and toxic materials impacts would be anticipated as a result of the implementation of Alternative 2 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. Although historically spills and leaks have occurred within Parcel 1A of the Fort Trumbull area, all of the contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility and approximately 4 ft of clean fill was placed on the site. Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes. Further, it is not reasonably foreseeable that the proposed projects in the vicinity would require the storage of hazardous and/or toxic wastes.

5.13.2.3 Alternative 3 (Parcel 4A: Fort Trumbull Area)

Air Quality

Implementation of Alternative 3 would result in direct, short-term adverse impacts associated with fugitive dust emissions caused by construction activities. These impacts would be mitigated to less-than-significant levels through the application of BMPs and dust control measures during construction activities and would not contribute to cumulative impacts. Thus, minor adverse, cumulative, air quality impacts would be anticipated as a result of the new National Museum and proposed projects within the vicinity of the project study area due to the increase in construction activities.

Noise

Minor, short-term adverse cumulative noise impacts would be anticipated as a result of the construction-related activities of the new National Museum and proposed projects within the vicinity of the project study area. Nearby businesses and residences would be expected to experience short-term noise impacts, due to multiple pieces of equipment operating concurrently.

Wetlands

According to the NWI, there are no jurisdictional wetlands are present within Parcel 4A; however, during AMEC site reconnaissance a potential wetland was observed in the southwest corner of Parcel 4A. Therefore, minor adverse, direct, cumulative impacts to wetlands would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project study area if the mitigation measures described in **Section 5.6.6** are not implemented. In addition, Parcel 4A is located within close proximity to the Thames



River, and thus, development may cause indirect wetland degradation to areas in the vicinity of the project study area.

Coastal Resources

No significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 3 in conjunction with the proposed projects in the vicinity.

Surface Waters/Floodplains

Minor, long-term adverse cumulative impacts to floodplains would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project study area. A portion of the southwest corner of Parcel 4A is located within the 100-year floodplain; therefore, the increase of impermeable surfaces within the floodplain would result in an increase in runoff reaching the Thames River, prior to the New London Wastewater Treatment Facility. In addition, several areas adjacent to Parcel 4A are within the 100-year floodplain according to FEMA, and therefore, development may cause direct impact to the floodplain in the vicinity of the project study area if the mitigation measures described in **Section 5.6.6** are not implemented.

Historic and Architectural Resources

Parcel 4A is located within close proximity to Fort Trumbull and the Downtown New London Historic District. Although Alternative 3 would have no direct impacts to any NRHP-listed structures, minor adverse cumulative impacts would be anticipated. Alternative 3 in conjunction with the proposed projects in the vicinity may cause indirect adverse visual impacts upon important historic properties. Beneficial impacts to the Fort Trumbull area would result from the close proximity to the Fort Trumbull State Park, as a result of the common historic focus between the new National Museum and the Park.

Threatened and Endangered Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Parcel 4A is not located within a special habitat area. Impacts to threatened and endangered species, if present, would be managed to less-than-significant levels through the development of an acceptable plan to minimize impacts to these species, and would not contribute to cumulative impacts.

Socioeconomics

Implementation of Alternative 3 would result in minor, long-term, positive impacts to the regional economy of New London, Connecticut by providing construction and later jobs within the new National Museum. Positive cumulative impacts to the New London, Connecticut economy would be anticipated, due to the redevelopment of the Fort Trumbull area. Furthermore, positive cumulative socioeconomic impacts would be anticipated as a result of the new National Museum and other proposed projects within the vicinity of the Fort Trumbull area.

Cultural Resources



Implementation of Alternative 3 would result in minor, long-term, positive cumulative impacts to the Fort Trumbull area as a result of the close proximity of the proposed new National Museum and the Fort Trumbull State Park, as well as other proposed projects within the vicinity of the fort Trumbull area.

Environmental Justice

No cumulative environmental justice impacts would be anticipated as a result of the implementation of Alternative 3 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. Although the City of New London is comprised of a disproportionate percentage of minority and low-income populations compared to New London County and the State of Connecticut, the proposed action does not involve the displacement of any of these minorities.

Infrastructure

Implementation of Alternative 3 would result in less-than-significant utility infrastructure impacts and no cumulative impacts to utility infrastructure. Furthermore, implementation of Alternative 3 would result in minor, positive cumulative impacts to transportation infrastructure in the Fort Trumbull Area, due to road improvements. A minor increase in vehicular traffic on Smith, East, Walbach and Trumbull Streets may occur due to the number of visitors to the new National Museum, but this increase could be easily handled by the existing road capacity as determined by the, March 2001, *Traffic Impact Study Fort Trumbull MDP New London, Connecticut* (Wilbur Smith 2001).

Hazardous and Toxic Materials

No cumulative hazardous and toxic materials impacts would be anticipated as a result of the implementation of Alternative 3 in conjunction with proposed projects in the vicinity of the Fort Trumbull area. No spills and leaks have historically occurred within Parcel 4A of the Fort Trumbull area. Additionally, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes. Further, it is not reasonably foreseeable that the proposed projects in the vicinity would require the storage of hazardous and/or toxic wastes.

5.13.2.4 Alternative 4 (Riverside Park)

Air Quality

Implementation of Alternative 4 would result in direct, short-term adverse impacts associated with fugitive dust emissions caused by construction activities and mobile source emissions. These impacts would be mitigated to less-than-significant levels through the application of BMPs and dust control measures during construction activities. Thus, minor adverse, cumulative, air quality impacts would be anticipated as a result of the new National Museum and proposed projects within the vicinity of the project study area due to the increase in construction activities.

Noise

Minor, short-term adverse cumulative noise impacts would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project



study area. Nearby businesses and residences would be expected to experience short-term noise impacts, due to multiple pieces of equipment operating concurrently.

Wetlands

No jurisdictional wetlands are present within Riverside Park. However, minor, indirect, cumulative impacts to wetlands would be anticipated as a result of the construction of the new National Museum and proposed projects within the vicinity of the project study area. Riverside Park is located within close proximity to the Thames River, therefore, development may cause indirect wetland degradation.

Coastal Resources

No significant adverse impacts to coastal resources or water-dependent uses are anticipated due to implementation of Alternative 4 in conjunction with the proposed projects in the vicinity. Neither the portion of Riverside Park proposed for development nor are the projects within the vicinity located within the coastal boundary.

Surface Waters/Floodplains

No surface waters are located within the Riverside Park area, where potential construction of the proposed new National Museum would occur; therefore, no construction-related and/or operational impacts to these waters would be anticipated due to implementation of Alternative 4. Riverside Park is not in a FEMA 100-year floodplain; therefore, no construction-related and/or operational impacts to the floodplain would be anticipated.

Historic and Architectural Resources

No NRHP-listed or eligible structures are located within Riverside Park. The Dashon-Allyn House and the Winslow Ames House are located approximately one-mile from Riverside Park. In addition, due to the age of the surrounding neighborhoods, it is probable that various structures near the park could be eligible for NRHP-listing. Further, Riverside Park possesses a moderate to high sensitivity for prehistoric and historic archaeological resources due to Native American and Colonial American settlement patterns. Moderate adverse cumulative impacts on historic areas would be anticipated due to implementation of Alternative 4 in conjunction with proposed projects in the vicinity, due to probability for prehistoric and historic resources in the area. Increased development has the potential to disturb these sensitive areas.

Threatened and Endangered Species

AMEC personnel conducted an Endangered Species Review, utilizing the CTDEP "State and Federal Listed Species and Significant Natural Communities" maps. According to the review, Riverside Park is not located within a special habitat area. Impacts to threatened and endangered species, if present, would be managed to less-than-significant levels through the development of an acceptable plan to minimize impacts to these species, and would not contribute to cumulative impacts.

Socioeconomics

Implementation of Alternative 4 would result in minor, long-term, positive impacts to the regional economy of New London, Connecticut by providing construction and later jobs within the new



National Museum. Positive cumulative impacts to the New London, Connecticut economy would be anticipated. Furthermore, positive cumulative socioeconomic impacts would be anticipated as a result of the new National Museum and proposed projects within the vicinity of the project study area.

Environmental Justice

No cumulative environmental justice impacts to minority groups in the City of New London would be anticipated as a result of the implementation of Alternative 4 in conjunction with proposed projects in the vicinity of the Riverside Park area. The Proposed Action would not involve the displacement of minority and/or low-income populations that reside in New London, Connecticut.

Infrastructure

Implementation of Alternative 4 would result in less-than-significant utility infrastructure impacts and no cumulative impacts to utility infrastructure. Furthermore, implementation of Alternative 4 would result in minor, positive cumulative impacts to transportation infrastructure in the Riverside Park area, due to road improvements. An increase in vehicular traffic on residential roadways may occur due to the number of visitors to the new National Museum. The potential increase in vehicular traffic, in conjunction with proposed projects in the vicinity may have moderate adverse cumulative transportation impacts.

Hazardous and Toxic Materials

No cumulative hazardous and toxic materials impacts would be anticipated as a result of the implementation of Alternative 4 in conjunction with proposed projects in the vicinity of the Riverside Park area. According to City of New London personnel, no hazardous and/or toxic wastes have been stored within Riverside Park. Additionally, there is no existing data to suggest that there are any historic HTMW concerns at Riverside Park. Further, the operation of the new National Museum would not require the storage of hazardous and/or toxic wastes and it is not reasonably foreseeable that the proposed projects in the vicinity would require the storage of hazardous and/or toxic wastes.

5.13.2.5 Alternative 5 (No Action Alternative)

Under the No Action Alternative, the USCG Museum would continue as under current conditions at the USCG Academy, and no environmental impacts would occur. Therefore, no cumulative environmental impacts would occur. However, the following cumulative cultural and socioeconomic impacts would occur due to the implementation of Alternative 5:

Cultural Resources

Implementation of Alternative 5 would result in moderate, long-term adverse cumulative impacts to USCG artifacts due to the inadequate preservation, storage, display and interpretation of the artifacts and rich maritime history.



Socioeconomics

Minor adverse cumulative socioeconomic impacts would be anticipated, due to the loss of potential jobs and the absence of 200,000 visitors per year to the New London area. In addition, moderate adverse cumulative socioeconomic impacts may occur due to the loss of educational opportunities as related to maritime.



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6.0 COMPARISON OF ALTERNATIVES AND CONCLUSIONS

As a result of the implementation of Alternative 1 (Parcel 1: Fort Trumbull), the following impacts would be anticipated:

- Less-than-significant, short-term, land use impacts due to the modification of the *Fort Trumbull MDP*.
- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Positive. Long-term impact to coastal resources due to the maintained level of water dependent use at Fort Trumbull, in accordance with the *Fort Trumbull MDP*.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

The following impacts would be anticipated as a result of the implementation of Alternative 2 (Parcel 1A: Fort Trumbull):

- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.



- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

As a result of the implementation of Alternative 3 (Parcel 4A: Fort Trumbull), the following impacts would be anticipated:

- Less-than-significant, short-term, land use impacts due to the modification of the *Fort Trumbull MDP*.
- Less-than-significant, short-term adverse air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.
- Less-than-significant, long-term impact to water resources due to the potential presence of a wetland.
- Less-than-significant, long-term impacts to biological resources due to habitat disturbance and change.
- Positive, long-term impacts to USCG artifacts due to proper preservation, storage, display and interpretation.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

The following impacts would be anticipated as a result of the implementation of Alternative 4 (Riverside Park):

- Minor, long-term adverse land use impacts would be anticipated due to the loss of less than 3 acres of park/deciduous forest, requiring a zoning ordinance amendment.
- Less-than-significant, short-term air quality impacts due to increased mobile emissions and fugitive dust during construction. Less-than-significant, long-term operational air quality impacts due to increased vehicular traffic and heating systems.
- Minor, short-term adverse noise impacts due to construction-related activities and associated equipment.
- Less-than-significant, short-term impacts to geology, topography, and soils due to potential soil erosion during construction.



- Less-than-significant, long-term impacts to biological resources due to habitat disturbance.
- Less-than-significant, long-term adverse impacts to archaeological resources due to the potential presence of buried archaeological deposits and artifacts on the property.
- Positive, long-term, impacts to USCG artifacts due to proper preservation, storage, display and interpretation of USCG artifacts.
- Minor, short- and long-term positive socioeconomic impacts due to increased employment associated with the construction and operation.
- Less-than-significant, long-term impacts to infrastructure (utility and transportation) due to the additional load that would be placed on infrastructure.

The following impacts would be anticipated as a result of the implementation of Alternative 5 (No Action: continued operation at the USCG Academy Library):

- Moderate, long-term adverse impacts to USCG artifacts due to the inadequate preservation, storage, display and interpretation of the artifacts and rich maritime history.
- Minor, long-term adverse socioeconomic impacts due to the loss of potential jobs and the absence of 200,000 potential visitors per year to the new National Museum.
- Moderate, long-term adverse socioeconomic impacts due to the loss of educational opportunities as related to maritime history.

It is reasonably foreseeable that the following actions would occur due to the implementation of Alternative 5; Parcel 1 (including Parcel 1A) would be the location for the proposed development of a waterfront hotel and conference center. The hotel and conference center would contain 133 rooms, a 5,000 square foot conference space, a restaurant, indoor pool and fitness center. The hotel and conference center would result in an all surface parking lot, as compared to the proposed structured parking. Parcel 4A would be developed by the NLDC into a mixed use area while providing a supporting component to the adjacent Fort Trumbull State Park. In addition, Riverside Park would remain a public park, providing recreation and forested open-space. The City of New London does have foreseeable plans to improve the park; however, according to the City Planner, Harry Smith, the improvements would be slight as funding for park improvements is limited. However, minimal site improvements may occur, subject to funding. Further, several entities are actively pursuing development opportunities within portions of Riverside Park.

This analysis determines that an Environmental Impact Statement (EIS) is not necessary for implementation of the Proposed Action and that a FONSI is appropriate. **Table 6-1** summarizes potential impacts for each alternative.



**TABLE 6-1:
Summary Descriptions of Impacts (with Mitigation)
Associated with Alternatives 1, 2 and 3 at the Project Study Areas**

Resource Area	Alternative 1 Parcel 1		Alternative 2 Parcel 1A		Alternative 3 Parcel 4A		Alternative 4 Riverside Park		Alternative 5 No Action	
	Const.	Op.	Const.	Op.	Const.	Op.	Const.	Op.	Const.	Op.
Land Use	■	○	□	○	■	○	■	●	□	○
Air Quality	■	●	■	●	■	●	■	●	□	●
Noise	■	○	■	○	■	○	■	○	□	○
Geology, Topography, and Soils	■	○	■	○	■	○	■	○	□	○
Coastal and Water Resources	□	○	□	○	□	○	□	○	□	○
Biological Resources	■	○	■	○	■	○	■	●	□	○
Cultural Resources	□	○	--	--	□	○	--	--	--	--
Architectural Resources	□	○	□	○	□	○	□	○	□	○
Archaeological Resources	□	○	□	○	□	○	■	○	□	○
USCG Artifacts	□	●	□	●	□	●	□	●	□	●
Socioeconomics	■	●	■	●	■	●	■	●	■	●
Environmental Justice	□	○	□	○	□	○	□	○	□	○
Infrastructure	■	●	■	●	■	●	■	●	□	●
Hazardous and Toxic Materials/Wastes (HTMW)	□	○	□	○	□	○	□	○	□	○

Notes:

Const. = Construction

Op. = Operation

Key to Table 6-1 Symbols

Moderate Adverse Impact	Minor Adverse Impact	No Impact	Minor Positive Impact	Moderate Positive Impact
Long-Term Impact				
●	●	○	●	●
Short-Term Impact				
■	■	□	■	■



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- 16 USC 1451-1456 Coastal Zone Management Act (CZMA) of 1972. 16 United States Code 1451-1456.
- 16 USC 1531 *et seq.* Endangered Species Act (ESA) of 1973. United States Code 1531 *et seq.*
- 16 USC 469 Archaeological and Historic Preservation Act. United States Code 469.
- 40 CFR 1500-1508 President's Council on Environmental Quality (CEQ). *Regulations Implementing the Procedural Provisions of NEPA*. Title 40 Code of Federal Regulations Parts 1500-1508.
- 42 USC 4321 National Environmental Policy Act (NEPA) of 1969. United States Code 4321 *et seq.*
- 42 USC 4903 Noise Control Act of 1972. United States Code 4903.
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8.0 GLOSSARY

A-Weighted Decibels (dBA) – An expression of the relative loudness of sound in air detected by the human ear.

Adverse – A harmful or undesired effect.

Aesthetics – Defined as the theory of beauty, or the philosophy of art, explaining concepts of sublime, representation, aesthetic value and expression (*refer to **Appendix B***).

Ambient – The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards – Those standards established according to the CAA to protect health and welfare.

Amtrak – The brand name of the National Railroad Passenger Corporation. Amtrak is a quasi-governmental agency, created on May 1, 1971, as the United States intercity passenger train.

Aquifer – An underground geological formation containing usable amounts of groundwater that can supply wells and springs.

Attainment Area – A region that meets the National Ambient Air Quality Standard (NAAQS) for a criterion pollutant under the CAA.

Barracks – A type of military housing.

Base Realignment and Closure (BRAC) Commission – Established by Congress to ensure the integrity of the closure of excess military installations and to realign the total asset inventory in order to save money on operations and maintenance.

Bedrock – The native consolidated rock underlying the earth's surface.

Best Management Practices (BMP) – Management or structural practices used to reduce the quantities of pollutants produced by an action.

Carbon Monoxide (CO) – An odorless, colorless gas produced as a result of the incomplete burning of carbon or carbonaceous materials such as fossil fuels from automobiles, buses, trucks, small engines, boilers and from certain industrial processes. In 1999, the State of Connecticut was redesignated as in attainment for the National Ambient Quality Standard (NAAQS) for carbon monoxide statewide. Previously, Hartford, New Haven and Fairfield County regions were designated nonattainment (*see National Ambient Air Quality Standard*).

Coast Guard Exhibit Center – Located in Forestville, Maryland, the Coast Guard Exhibit Center preserves and stores artifacts that reflect the history and traditions of the United States Coast Guard (USCG) and its operations, with the exception of historic buildings or structures.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse affect on air, water, or soil.

Corcoran Jennison Company, Inc. – A real estate development company, based out of Boston, Massachusetts.



Connecticut Coastal Management Manual – A tool for coastal land use agents, boards and commissions, as well as developers, consultants and individuals to use in understanding how to apply the standards and policies of the Connecticut Coastal Management Act.

Connecticut Department of Environmental Protection (CTDEP) – A State agency established to protect human health and the environment within the borders of the State of Connecticut.

Connecticut General Statutes (CGS) Chapter 442, §22a-67, et seq. – Authorizes a municipality to regulate noise by local ordinance.

Connecticut Historical Commission – A division of the SHPO designed to identify, register, and protect buildings, sites, and objects that hold historical or cultural significance to the State of Connecticut.

Connecticut One-Call – A hotline call center designated to inform and protect public safety regarding excavations near underground facilities.

Connecticut State Historic Preservation Office (SHPO) – Responsible for the identification, registration, and protection of the state's cultural resources. The SHPO administers a variety of programs which include, survey and inventory, listing on the State and National Registers of Historic Places, environmental review, restoration tax credits, grants-in-aid, and technical assistance. A staff of archaeology, history, and architecture professionals at the State Historic Preservation Office works with other state agencies, nonprofit organizations, local officials, and private citizens in administering these programs.

Council on Environmental Quality (CEQ) – An Executive Office of the President composed of three members that the President appoints, subject to Senate approval. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the Federal government. Members are to be conscious of, and responsive to, the scientific, economic, social, esthetic, and cultural needs of the Nation, and formulate and recommend national policies to promote quality improvement of the environment.

Criteria Pollutants – The CAA required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. The six "criteria pollutants" are: ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), nitrogen oxides (NO_x), and particulate matter of than 2.5 micrometers in diameter (PM_{2.5}) or less than 10 micrometers in diameter (PM₁₀).

Cultural Resources – The physical evidence of our Nation's heritage, including archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community (*refer to Appendix B*).

Cumulative Impact – An environmental impact that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Day-Night Level (L_{dn}) – A-weighted equivalent sound level for a 24-hour period (*see A-weighted decibel*).

De Minimis Threshold Limits – The concentration limit of something that is of minimum importance; something that is so small it doesn't matter.



Deciduous – Defined as plant species, typically trees and shrubs, which lose all of their foliage for part of the year.

Demographics – Characteristics of human populations and population segments.

Direct Effects – Effects that an action causes, and that occur at the same time and same place (40 CFR 1508.8 (a)) (*refer to **Appendix B***).

Eastern Pequot Tribe – A Native American tribe of people formerly inhabiting eastern Connecticut, with descendants currently in the same area. The Pequot and the Mohegan Tribe were at one time the same people until the Mohegan Tribe broke away in the early 17th Century (*see **Mohegan Tribe***).

Ecosystem – A complex set of relationships of living organisms working together in relation with the physical environment to form a community, known as an ecosystem.

Elevation – Used in referencing a geographic location through its height above a fixed reference point, often mean sea level.

Emission – A release of a pollutant.

Environmental Assessment (EA) – An environmental analysis prepared pursuant to NEPA to determine whether a federal action would significantly affect the environment and thus require a more detailed environmental impact statement. An EA is a concise public document that determines whether to prepare an EIS, or a FONSI.

Environmental Baseline Survey (EBS) – A survey conducted to characterize the existing environmental conditions on and around a certain area or property.

Environmental Impact Statement (EIS) – A document required of federal agencies by the National Environmental Policy Act for major projects or legislative proposals significantly affecting the environment. A tool for decision making, it describes the positive and negative effects of the undertaking and cites alternative actions. An EIS documents the information required to evaluate the environmental impact of a project. It informs decision makers and the public of the reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the environment.

Environmental Justice – The fair treatment and involvement of all people, regardless of race, ethnicity, income and education, in environmental decision making.

Erosion - The wearing away of land surface by wind and water.

Farmland – Cropland, pastures, meadows, and planted woodland.

Feasibility Study – The mechanism for the development, screening and detailed evaluation of alternative remedial actions (*see **Remedial Investigation and Remediation***).

Federal Emergency Management Agency (FEMA) – An agency within the United States government, established to coordinate the response to a disaster that has occurred within the United States.

Finding of No Significant Impact (FONSI) – A document prepared pursuant to NEPA, preceded by an EA, that supports that a proposed action would not have a significant impact on the environment and thus would not require preparation of an EIS. An FONSI is based on the results of the EA.



- **Draft FONSI** – A draft FONSI is prepared and made available for public review and comment for a minimum of 30 days prior to making a final decision and proceeding with an action.
- **Final FONSI** – At the conclusion of the Final EA and the public review and comment period of the draft FONSI, the decision maker may sign the FONSI and take immediate action.

Floodplain – Nearly flat plain along the course of a stream that is naturally subject to flooding (refer to **Appendix B**).

Fort Griswold – Located on Groton Heights, Connecticut, on the eastern shores of the Thames River, Fort Griswold assisted Fort Trumbull in defending the port of the Thames River. After Fort Griswold was decommissioned, the State of Connecticut redeveloped the area into the Fort Griswold Battlefield State Park.

Fort Trumbull – Established in 1777 at the mouth of the Thames River, the fort served to protect New London Harbor and the Thames River. The existing granite masonry fort was built from 1839 to 1852. Between 1915 and 1932, Fort Trumbull also served the United States Coast Guard Academy before it moved to the current location in New London. The Naval Underwater Warfare Center occupied Fort Trumbull between 1950 and 1990 (see *Naval Underwater Warfare Center below*). After the Naval Underwater Warfare Center closed in the mid-1990's, the New London Development Corporation (see *New London Development Corporation below*) began to redevelop Fort Trumbull into a State Park. The Fort Trumbull State Park was opened to the public in the spring of 2001.

Fossil Fuels – Buried combustible geologic deposits of organic matter.

Fugitive Dust – Particles that are light enough to be suspended in air and that are not caught in a capture or filtering system. For this document, "fugitive dust" refers to particles occurring in the air from moving vehicles and air movement over disturbed soils at construction sites.

GB – A groundwater quality classification, used by the CTDEP, which indicates that groundwater is presumed to need treatment prior to any human consumption. In Connecticut, Surface and groundwater quality classifications are maintained and adopted by the Bureau of Water Management of the Department of Environmental Protection.

General Dynamics Electric Boat Facility – A major builder of submarines for the United States Navy. The main facility is based in Groton, Connecticut.

Geographic Information System (GIS) – A computer system that allows environmental analysts to compile, analyze, and model information relevant to proposals that require environmental analysis. It is also a tool that assists decision making by providing a visual depiction of complex data, customized for the situation and circumstances associated with that decision.

Geology – Science that deals with the physical history of the earth, the rocks of which the earth is composed, and the physical changes in the earth.

Golden Hill Paugussett Tribe – A Native American tribe of people formerly inhabiting southern Connecticut, and often referred to as a portion of the Mattabesic Confederation. The Mattabesic Confederation never actually existed but was, instead, a collection of villages sharing a common language and culture. Currently, the Golden Hill Paugussett Tribe is recognized only by the State of Connecticut and not the federal government. Golden Hill at



Trumbull, Connecticut is the oldest Indian reservation in the United States; however it has been reduced to 0.26 acre. In 1979, the Golden Hill Paugussett Tribe purchased 108 acres near Colchester, Connecticut where the tribe currently resides.

Hazardous Substances – A substance as defined by section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):

- a. For the purpose of this regulation, a hazardous substance is any one of the following: 1) Any substance designated pursuant to section 311(b) (2) (A) of the Clean Water Act of 1977 (CWA). 2) Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of CERCLA. 3) Any hazardous waste having the characteristics identified under the Resource Conservation and Recovery Act (RCRA). 4) Any toxic pollutant listed under TSCA. 5) Any hazardous air pollutant listed under Section 112 of CAA. 6) Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to fraction subsection 7 of TSCA.
- b. The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in paragraph “a” above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- c. A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste – A solid waste that, when improperly treated, stored, transported, or disposed, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR section 261.3 or applicable foreign law, rule, or regulation (*see also solid waste*).

Hazardous Waste Storage – As defined in 40 CFR 260. 10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed, or stored elsewhere".

Hydric Soils – Hydric soils are soils which are sufficiently wet in the upper part of the soil during the growing season in order to develop anaerobic conditions.

Indirect Effects – Effects that are caused by the action and that occur later in time or farther removed in distance but that are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate; and related effects on air, water, and other natural systems, including ecosystems (40 CFR 1508.8 (b)).

Infrastructure – A set of interconnected structural elements.

Lead (Pb) – An odorless, gray heavy metal found in the atmosphere as a result of man-made processes such as the extraction and processing of metallic ores, incineration of solid waste, and fuel combustion. The State of Connecticut has been in attainment of the National Ambient Air Quality Standard (NAAQS) for lead since 1990 (*see National Ambient Air Quality Standard*).

Less-than-significant – Being too small to signify importance.

Long-term – Involving or lasting for a relatively long period of time.

Mashantucket Pequot Tribe – Descendants of the Pequot who had held domination over the coastal area of present day Connecticut and Rhode Island. Today there are two



descendant groups of the Pequot, the Eastern Pequot Tribe and the Western Pequot, better-known as the Mashantucket Pequot. In 1992, the Mashantucket Pequot opened Foxwoods, the largest resort casino in the world, using revenue to continue the expansion of the reservation in the town of Ledyard, Connecticut.

Meteorological – A scientific study on the atmosphere that focuses on weather processes and forecasting.

Mitigation/Management – Measures taken to reduce adverse impacts on the environment.

Mobile Sources – Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Moderate – Being within reasonable limits; not excessive.

Mohegan Tribe – A Native American tribe formerly inhabiting eastern Connecticut and originally a part of the Pequot. In the 17th Century, the Mohegan Tribe rebelled against the Pequot by joining the English colonists during the King Philip's War (1675-1676). Today, descendants reside near Norwich, Connecticut and in Wisconsin.

Monitoring – The assessment of emissions and ambient air quality conditions. Monitoring techniques used are emission estimates, visible emission readings, diffusion or dispersion estimates, sampling, or measurement with analytical instruments.

National Ambient Air Quality Standards (NAAQS) – Nationwide standards developed up by the United States Environmental Protection Agency (USEPA) for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Six pollutants are currently regulated by primary and secondary NAAQS: carbon monoxide (CO), lead, (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM₁₀), and sulfur dioxide (SO₂). These standards must be attained and maintained in order to protect human and environmental health. NAAQS exist for particulate matter, ozone, sulfur dioxide, nitrogen dioxide, carbon dioxide, and lead (*see United States Environmental Protection Agency, Carbon Dioxide, Lead, Nitrogen Dioxide, Ozone, Particulate Matter, and Sulfur Dioxide*).

National Coast Guard Museum Association (NCGMA) – A non-profit organization created to raise funding for the design and construction of the New National Museum.

Naval Underwater Warfare Center (NUWC) – Established in 1970 as the Naval Underwater Systems Center (NUSC), underwater research and development activities were conducted at Fort Trumbull to provide underwater technological expertise in combat control and communication. In 1992, the NUSC was absorbed by the Naval Underwater Warfare Center with divisions in Newport, Rhode Island and Keyport, Washington. In 1996, the United States Navy closed the NUWC at Fort Trumbull and transferred property ownership to the State of Connecticut.

New London Development Corporation (NLDC) – A non-profit community development corporation comprised of citizens, business owners and community leaders of New London, Connecticut. The NLDC exists for, and are committed to, promoting and improving the economic health and quality of life in New London while attracting opportunities for its citizens and the entire region. The NLDC accomplishes its goals through the united leadership of this diverse community, the support of state and national leaders and rigorous public involvement.

Nitrogen Dioxide (NO₂) – A yellowish-brown gas found in high concentrations of ground-level ozone, formed as a result of high temperature combustions such as power plants and



automobile engines. The State of Connecticut has been in attainment of the National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide since 1990 (see *National Ambient Air Quality Standard*).

Non-Attainment Area – An area that has been designated by the USEPA or by the appropriate State air quality agency, as exceeding one or more national or state ambient air quality standards.

Office of Long Island Sound Programs (OLISP) – The Office of Long Island Sound Programs assists in coordinating programs with the CTDEP that have the potential to impact Long Island Sound.

Ozone (O₃) – A colorless gas that attributes to the majority of unhealthy air quality. Ozone forms in the atmosphere from the release of other pollutants; including volatile organic compounds and nitrogen oxides (see *volatile organic compounds and nitrogen oxides*).

Particulates/Particulate Matter (PM) – Fine liquid or solid particles, such as dust, smoke, mist, fumes, or smog found in air.

Paucatuck Eastern Pequot Tribe – Descendants of the Pequot, and a branch of the Eastern Pequot Tribal Nation. The Paucatuck Eastern Pequot merged in 2002 with the Eastern Pequot Tribe, to form the Eastern Pequot Tribal Nation. Currently, the Paucatuck Eastern Pequot reside on the Lantern Hill reservation in southeastern Connecticut (see *Eastern Pequot Tribe*).

Pfizer Pharmaceutical – The world's largest pharmaceutical company headquartered in New York City, New York. Locations include New London, Connecticut in the Fort Trumbull area.

Physiographic – One of eight regions within the United States, each of which are composed of smaller physiographic subdivisions.

Plant Community – A vegetative complex unique in its combination of plants that occurs in particular locations under particular conditions.

Pleistocene Epoch – The geologic timescale dating from 1,808,000 to 11,550 years before present (BP).

Pollutant – A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water – Water that is suitable for drinking.

Precipitation – Any type of product of condensation from atmospheric water vapor that is deposited on the earth's surface.

Prime and Unique Farmlands – Land that has the best combination of physical and chemical characteristics for producing crops.

New England Central Railroad – Originally the Central Vermont Railway, the mainline running from New London, Connecticut to East Alburg, Vermont was sold to RailTex in February 1995 and renamed the New England Central Railroad. In February 2000, RailTex merged with RailAmerica, where operations continue today.

Remedial Investigation – The mechanism for collecting data to: characterize site conditions; determine the nature of the waste; assess risk to human health and the environment; and



conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered.

Remediation – A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas – Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

Schaghticoke Tribal Nation – A village within the Mattabesic Confederation. Currently, the Schaghticoke Tribal Nation resides in Kent, Connecticut (*see Golden Hill Paugussett Tribe*).

Sensitive Receptors – Specific types or features within an area that may be negatively impacted by air pollutants (i.e. schools, nursing homes, child care centers, churches, private residences).

Short-term – Involving or lasting for a relatively brief period of time.

Significant Impact – According to 40 CFR 1508.27, "Significantly" as used in NEPA requires consideration of both context and intensity:

- a. *Context* - The significance of an action must be analyzed in several contexts, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.
- b. *Intensity* - Refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Socioeconomics – Economic and social structure of communities, tax rates, and characteristic types of development.

Soil – The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste – Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31 (40 CFR 261.2).

Special Flood Hazard Area – An area inundated by the flood having a 1-percent chance of being equaled or exceeded in any given year (base flood).

Special Status Species – Include any species that are listed, or proposed to be listed, on the Threatened or Endangered Species list (*see Endangered Species Act of 1973*).

Stratified Drift – Materials distinctively sorted by size and weight, indicating a medium of transport (wind, water).

Substrate – A surface on which an organism grows or is attached.

Sulfur Dioxide (SO₂) – An odorless, colorless gas at low concentrations with a very pungent odor in very high concentrations. Sulfur dioxide is produced as a result of the burning of fuels that contain sulfur, such as oil and coal. The State of Connecticut has been in attainment of the National Ambient Air Quality Standard (NAAQS) for sulfur dioxide since 1990 (*see National Ambient Air Quality Standard*).

Till – Unsorted glacial sediment.



Title V Air Permit – Operating permits, issued by State authorities, issued to air pollution sources after the polluting source has begun to operate.

Topography – Relief features or surface configuration of an area.

Toxic Substance – A harmful substance that includes elements, compounds, mixtures, and materials of complex composition.

United States Census Bureau – A Federal agency that collects, processes, analyzes, disseminates statistical data on the American public.

United States Coast Guard Academy – Located in New London, Connecticut, the United States Coast Guard Academy provides education to future officers of the United States Coast Guard.

United States Coast Guard NEPA Manual (COMDTINST M16475.ID) – A document that establishing policies and procedures for the United States Coast Guard to implement laws and regulations in regard to the National Environmental Policy Act (*see National Environmental Policy Act*).

United States Department of Housing and Urban Development (HUD) – A Federal agency established to develop and execute policy on housing and cities.

United States Environmental Protection Agency (USEPA) – A Federal agency established to protect human health and the environment within the borders and territories of the United States.

Wastewater – Water that has been negatively affected by human influence.

Wetlands – Areas that are regularly saturated by surface or groundwater and are therefore characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Some examples are swamps, bogs, fens, marshes, and estuaries (*refer to Appendix B*).

Wildlife Habitat – The set of living communities in which a wildlife population lives.

Wisconsin Glacial Stage – The most recent division of Pleistocene time and deposits in North America (*see Pleistocene*).



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9.0 LIST OF PREPARERS

USCG Contributors:

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Daniel Koski-Karell, Ph.D, USCG Office of Environmental Management.

Mark Zill, Contracting Officer's Technical Representative.

AMEC Earth & Environmental, Inc. Contributors:

Mr. Brian P. Sariano, Senior Project Manager. Mr. Sariano holds a B.A in Geo-environmental Science, with over 17 years of experience in environmental consulting and NEPA document preparation. His primary technical areas include air quality, water resources, socioeconomics, and HTMW. Mr. Sariano's primary responsibilities for this EA include internal and external coordination, as well as ensuring overall project performance. Mr. Sariano is responsible for the overall supervision of the project effort and assignment of key staff to successfully complete the required work.

Mr. Robert Michalkiewicz, Project Manager. Mr. Michalkiewicz holds a B.S. in Environmental Studies, with over 5 years of experience. Mr. Michalkiewicz's responsibilities include: development of the project management plan, preparation of the affected environment, evaluation of environmental consequences, guidance with the environmental impact analysis process, and identification of cumulative impacts. Management duties include day-to-day management of the project effort, and principal liaison to the USCG NEPA Program Manager, the COTR, and USCG Project Manager.

Ms. Laura Garrett, NEPA Practioner. Ms. Garrett has 3 years of experience and holds a B.S. in Environmental Studies. Ms. Garrett's responsibilities for this EA include preparation of the affected environment, evaluation of environmental consequences, performance of the environmental impact analysis process, and identification of cumulative impacts.

Mr. Jason Boni, Senior GIS Analyst. Mr. Boni holds a B.S. in Natural Resource Management, with over 7 years of experience in the development and maintenance of GIS architecture to include spatial analysis, cartographic production, and project support. His areas of expertise include military range and training land development and maintenance. Mr. Boni is a veteran of the United States Army. Mr. Boni's responsibilities for this EA involved collecting GIS data and developing the figures used herein.



Mr. Michael W. French, Senior Archaeologist. Mr. French holds a B.S. in Anthropology and a M.A. in Archaeology and has over 14 years of professional experience in archaeology and cultural resources management. His areas of expertise include prehistoric archaeology of the Ohio River Valley. He also has experience in prehistoric archaeology in the eastern United States, North Dakota and southeast Alaska. Mr. French has a working knowledge of Section 106 (of the National Historic Preservation Act) procedures, Federal and state regulations governing cultural resources, and project management. Mr. French's responsibilities for this EA involved compliance with cultural resource regulations and responsibilities.

Mr. Dave Zopff, P.E., Senior Environmental Engineer. Mr. Zopff holds a B.S. in Chemical Engineering, with over 20 years of experience in Environmental Process Engineering for the private, public, and military sectors. Mr. Zopff is knowledgeable in federal, state and local environmental programs, including the Clean Air Act (CAA), the Clean Water Act (CWA), Oil Pollution Act (OPA), the Resource Conservation and Recovery Act (RCRA). Mr. Zopff offers a variety of environmental management and process design experience to assist clients with key environmental management needs. His responsibilities for this EA involved the preparation of the Air Quality Applicability Analysis.

Mr. Doug McFarling, QA/QC Manager. Mr. McFarling holds a B.A. in Environmental Studies and has over 20 years experience of professional experience, including 16 years of management experience. His area of expertise include QA review responsibilities, serving as lead QA reviewer on more than 75 NEPA- compliant documents since 1997. Mr. McFarling's primary responsibilities for this EA include reviewing procedures, data management, document consistency, and resolution of specific issues.



10.0 AGENCIES AND INDIVIDUALS CONSULTED

Federal and Regional Agencies

United States Coast Guard Academy

Facilities Engineering Division
31 Mohegan Avenue
New London, CT 06320-8103
Attn: Catherine Jinkerson,
Secretary

United States Environmental Protection Agency

Region 1
1 Congress Street
Boston, MA 02114-2023
Attn: NEPA Coordinator

United States Fish & Wildlife Service

Northeast Regional Office
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Vaughn Douglass,
Lands & Development Program Chief

Federally-Recognized Native American Tribes

Eastern Pequot Reservation

Eastern Area Office
North Stonington, CT 06359

Golden Hill Paugussett

Golden Hill Indian Reservation
95 Stanavage Road
Trumbull, CT 06415

Mashantucket Pequot Tribal Nation

Eastern Area Office
P.O. Box 3060
Ledyard, CT 06339

The Mohegan Tribe

5 Crow Road
Uncasville, CT 06382



Paucatuck Eastern Pequot Tribe

Eastern Area Office
935 Lantern Hill Road
Ledyard, CT 06339

Schaghticoke Tribal Nation

33 Elizabeth Street
Derby, CT 06418

State and Local Agencies

City of New London

Parks and Recreation Department

181 State Street
New London, CT 06320
Attn: Tommie Major,
Director

City of New London

Office of Development & Planning

111 Union Street
New London, CT 06320
Attn: Bruce Hyde,
Director of Development and Planning

Connecticut Department of Environmental Protection

Office of Long Island Sound
Technical Services Section
79 Elm Street
Hartford, CT 06106-5127
Attn: Charles Evans,
Director

Connecticut Department of Environmental Protection

State Parks Division - Fort Trumbull State Park

79 Elm Street
Hartford, CT 06106-5127
Attn: Pamela Adams,
Director

New London County Soil & Water Conservation District

USDA Service Center
238 West Town Street
Norwich, CT 06360
Attn: Lenora J. Szruba,
Administrative Manager



New London Development Corporation

165 State Street, Suite 421
New London, CT 06320
Attn: Mr. John Brooks,
Waterfront Development Manager

Office of Connecticut State Archaeology

Box U-23
University of Connecticut
Storrs, CT 06106
Attn: Dr. Nicholas F. Bellantoni,
State Archaeologist

State Historic Preservation and Museum Division Office

One Constitution Plaza
Second Floor
Hartford, CT 06103
Attn: Karen Senich,
Deputy State Historic Preservation Officer



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FIGURES



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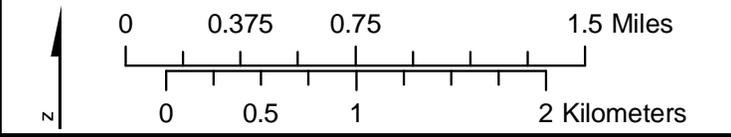
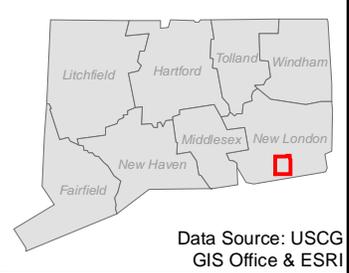
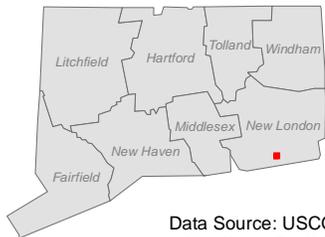


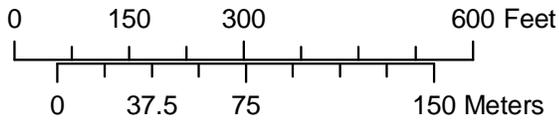
Figure 1-1
Regional Location Map
New London, Connecticut

Legend	
● Existing Museum	● Alternative 2
● Alternative 1	● Alternative 3
	● Alternative 4

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One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462



Data Source: USCG
GIS Office & ESRI



Legend

- Approximate Site Boundary
Parcel 1 - Fort Trumbull Area

Figure 2-1
Alternative 1
Parcel 1 - Fort Trumbull
New London, Connecticut

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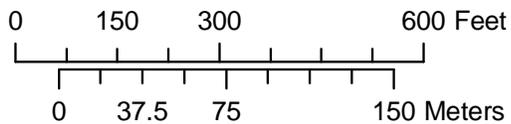
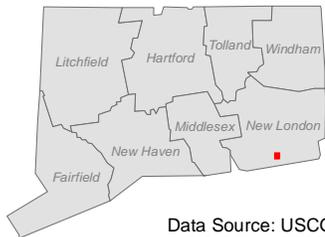


Figure 2-2
 Alternative 2
 Parcel 1A - Fort Trumbull
 New London, Connecticut

Legend

- Approximate Site Boundary
 Parcel 1A - Fort Trumbull Area

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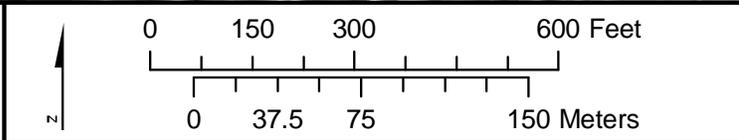
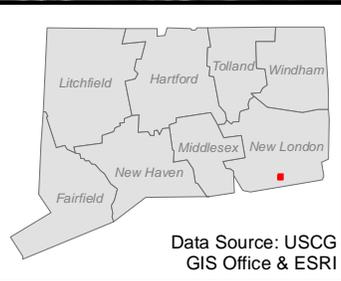


Figure 2-3
 Alternative 3
 Parcel 4A - Fort Trumbull
 New London, Connecticut

Legend

 Approximate Site Boundary
 Parcel 4A - Fort Trumbull Area

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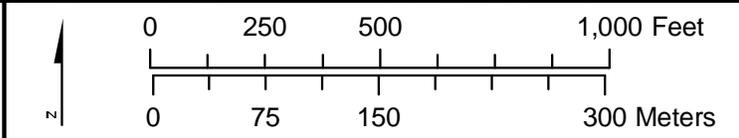
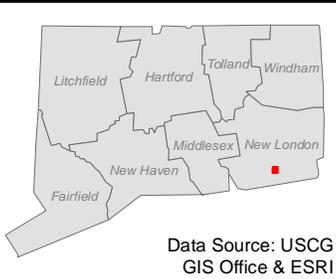
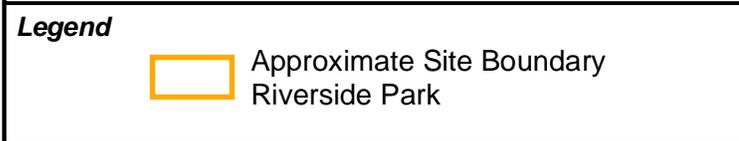
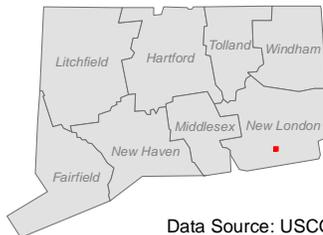
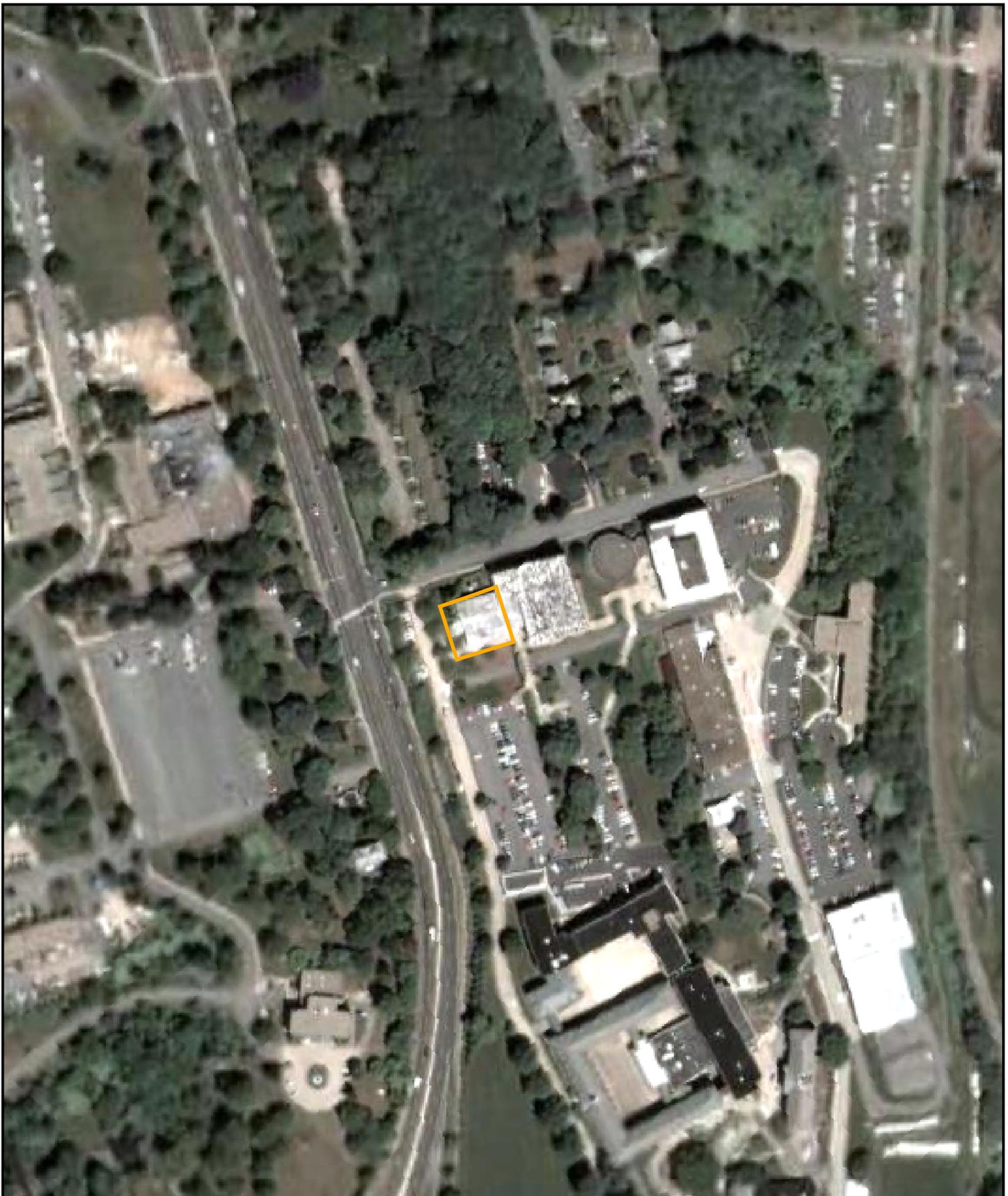


Figure 2-4
Alternative 4
Riverside Park
New London, Connecticut



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Data Source: USCG
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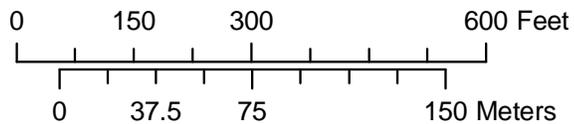


Figure 2-5
Alternative 5
USCG Academy
New London, Connecticut

Legend

- Approximate Site Location
Waesche Hall - USCG Academy



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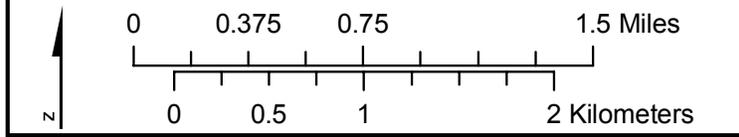
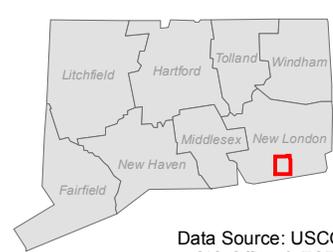
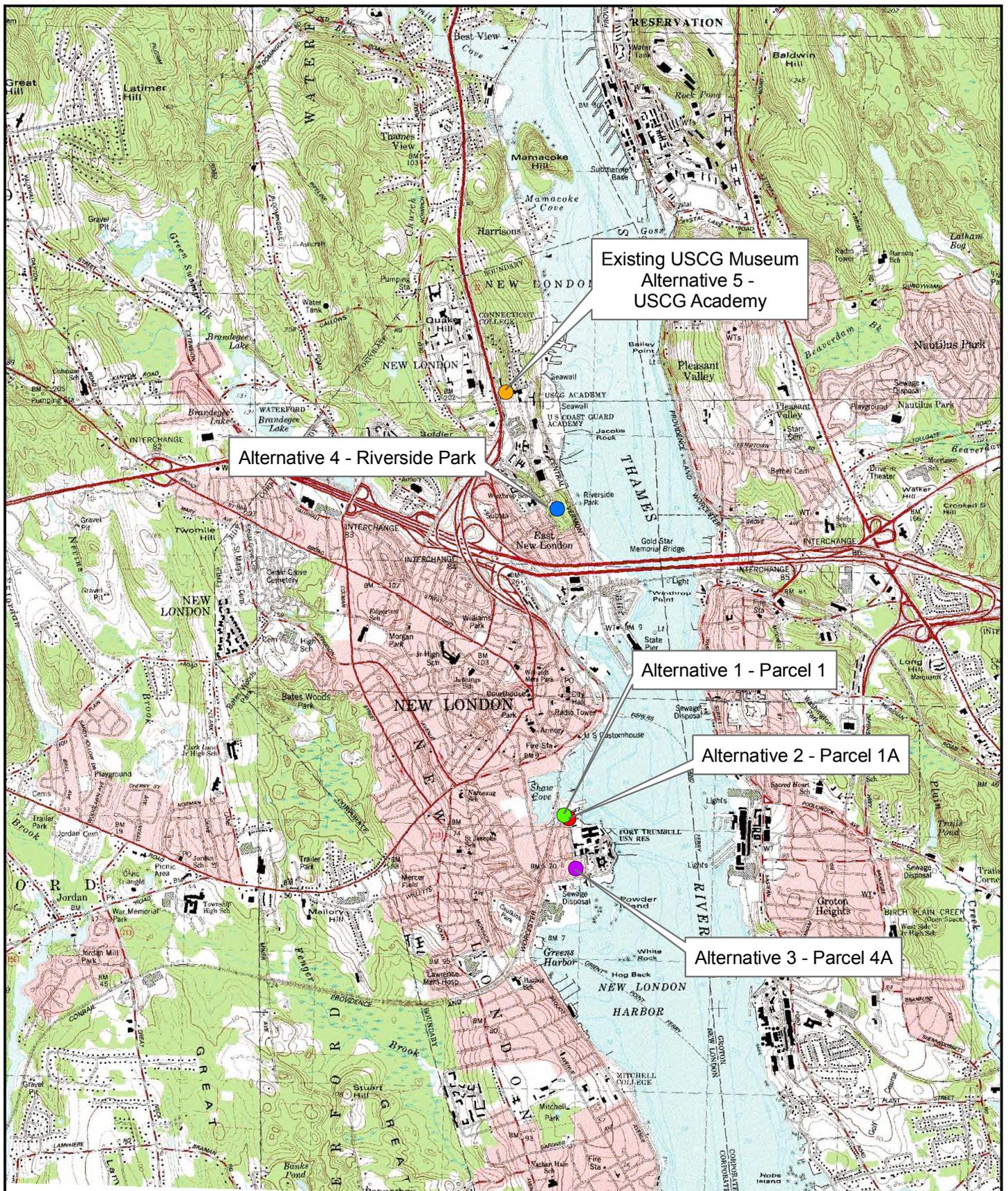


Figure 4-1
Regional Topographic Map
New London, Connecticut

Legend	
●	Existing Museum
●	Alternative 1
●	Alternative 2
●	Alternative 3
●	Alternative 4

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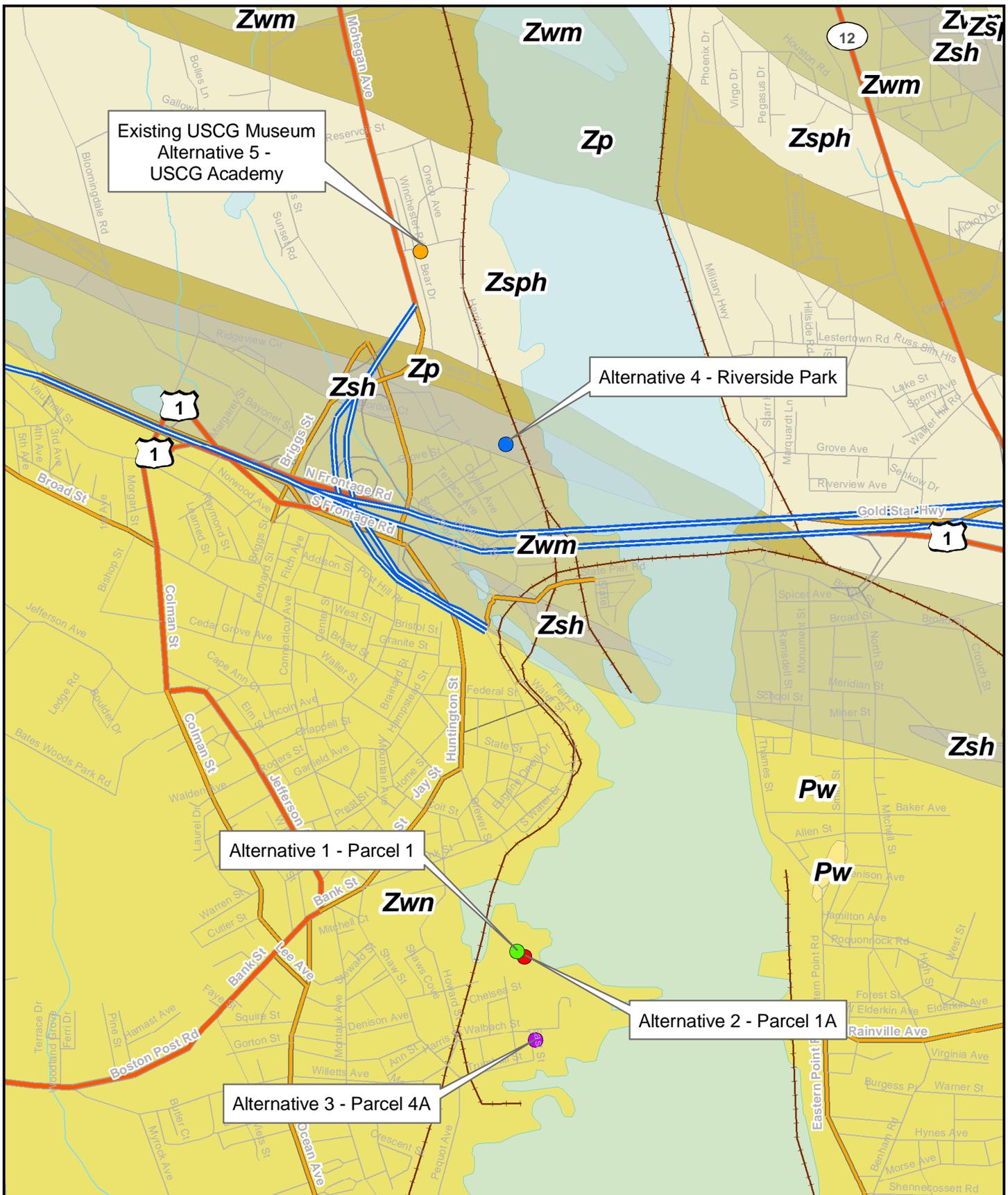
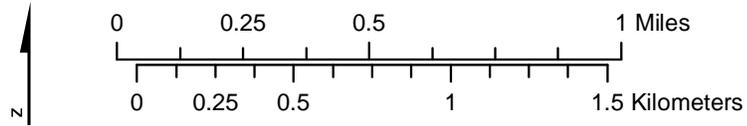


Figure 4-2
Regional Geologic Map
New London, Connecticut



Data Source: USCG
GIS Office. ESRI.



Legend	
● Existing Museum - Alternative 5	● Alternative 3 - Parcel 4A
● Alternative 1 - Parcel 1	● Alternative 4 - Riverside Park
● Alternative 2 - Parcel 1A	Zsh Hope Valley Alaskite Gneiss
	Zwm Mamacoke Formation
	Zwn New London Gneiss
	Zp Plainfield Formation
	Zsph Potter Hill Granite Gneiss
	PW Westerly Granite

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Alternative 1 - Parcel 1

Alternative 2 - Parcel 1A

Alternative 3 - Parcel 4A

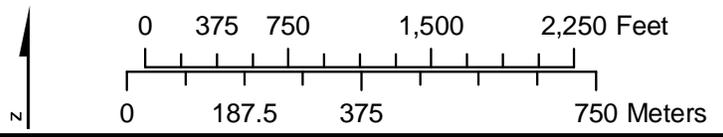
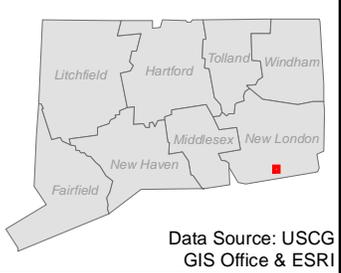
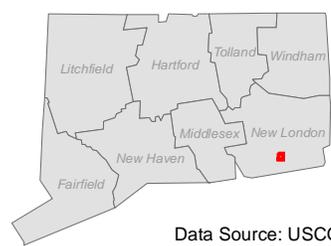
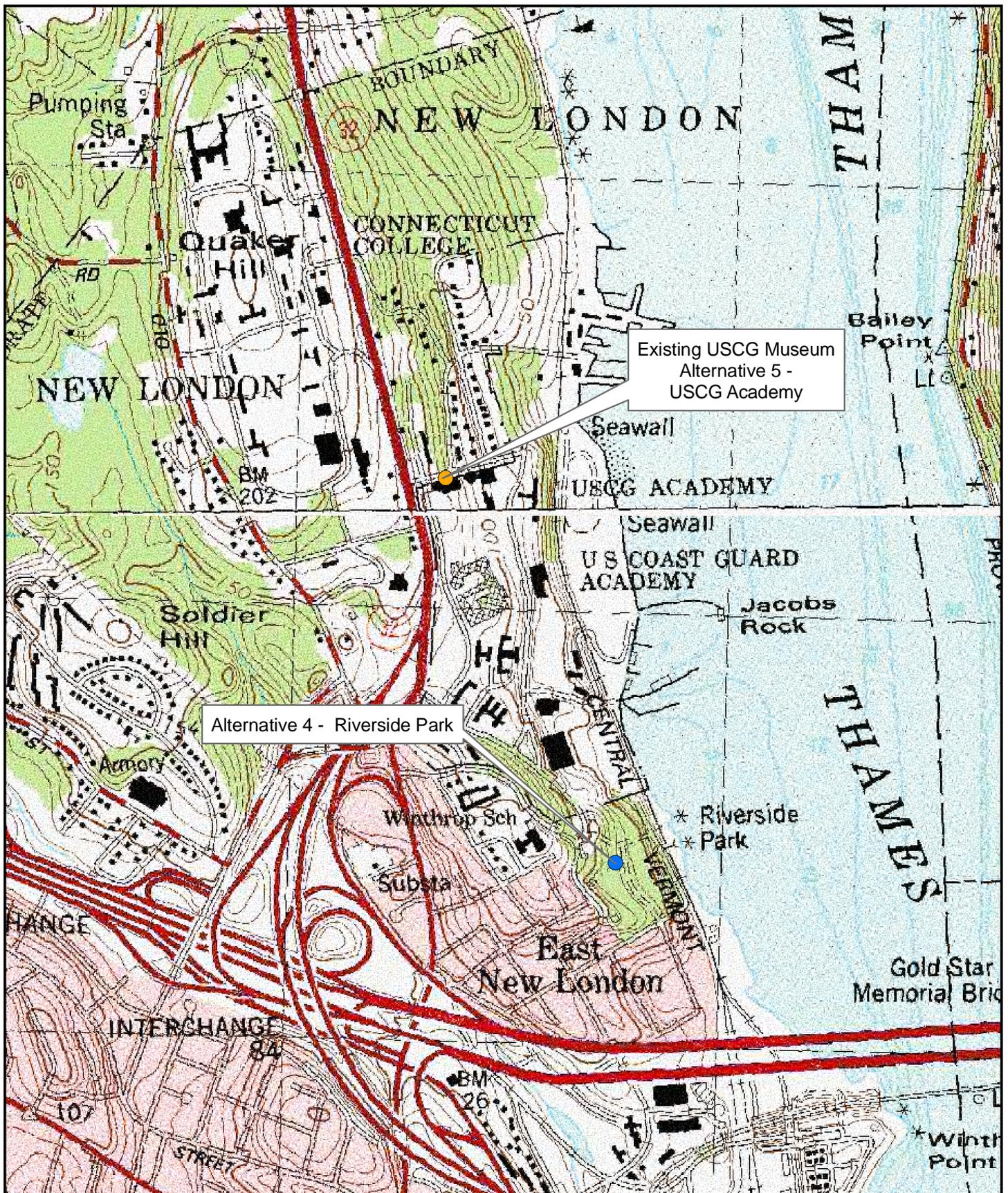


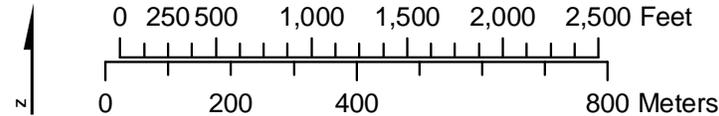
Figure 4-3a
 Alternatives 1, 2 & 3
 Topographic Contour Map
 New London, Connecticut

Legend	
● Existing Museum	● Alternative 2
● Alternative 1	● Alternative 3
● Alternative 4	

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Data Source: USCG GIS Office & ESRI



Legend

- Existing Museum
- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4

Figure 4-3b
 Alternatives 4 & 5
 Topographic Contour Map
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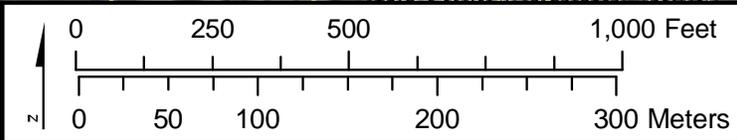
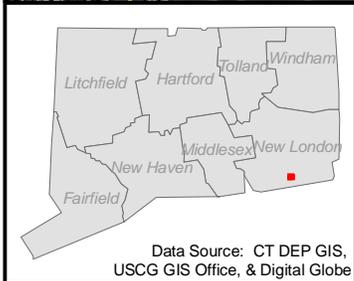
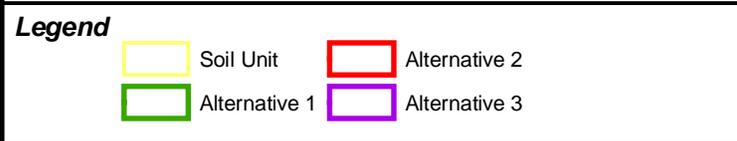
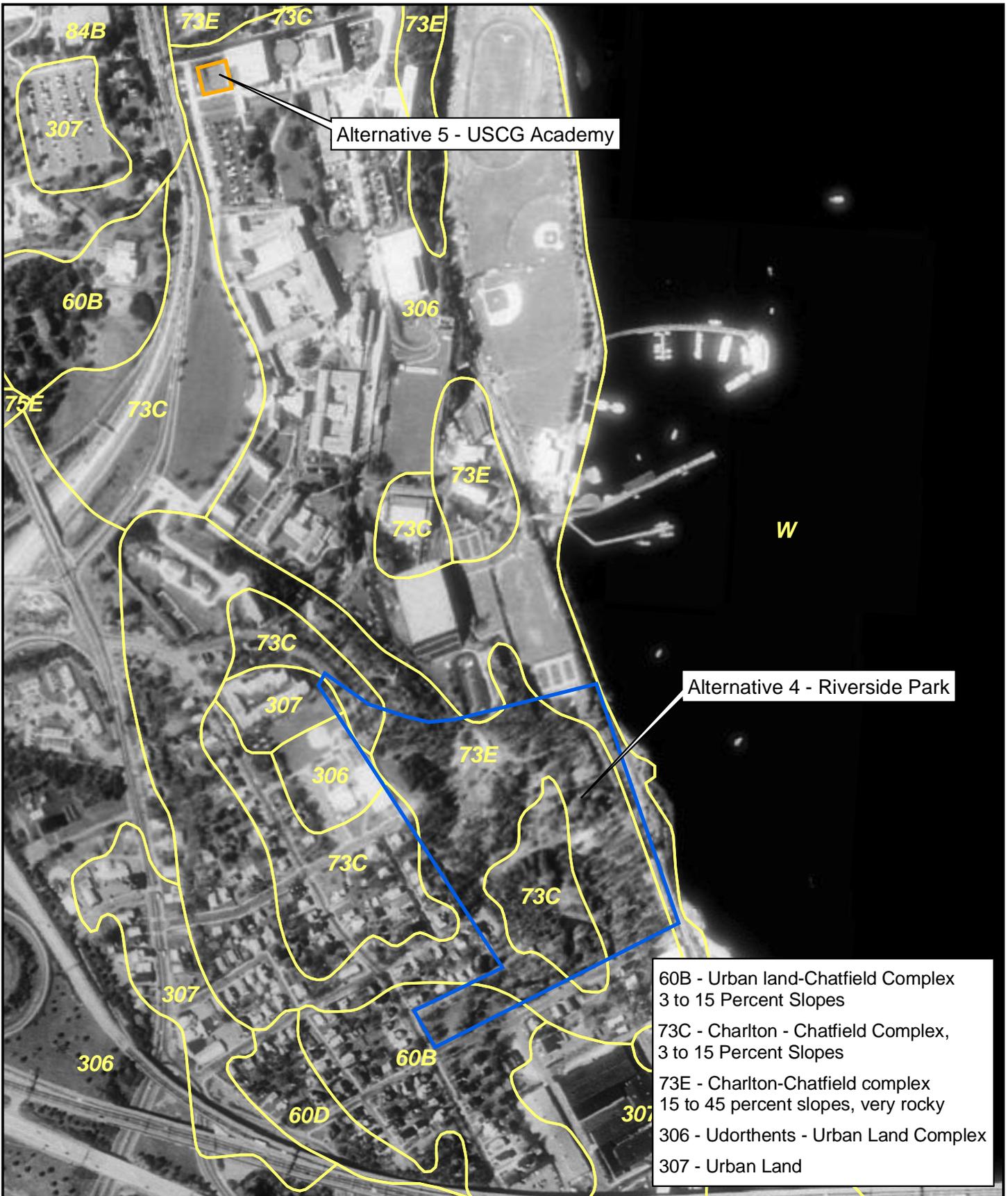


Figure 4-4a
 Alternatives 1, 2, & 3
 Soils Map
 New London, Connecticut



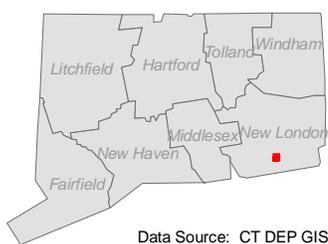
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Alternative 5 - USCG Academy

Alternative 4 - Riverside Park

- 60B - Urban land-Chatfield Complex
3 to 15 Percent Slopes
- 73C - Charlton - Chatfield Complex,
3 to 15 Percent Slopes
- 73E - Charlton-Chatfield complex
15 to 45 percent slopes, very rocky
- 306 - Udorthents - Urban Land Complex
- 307 - Urban Land



Data Source: CT DEP GIS, USCG GIS Office, & Digital Globe

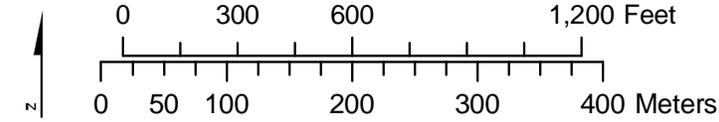


Figure 4-4b
Alternatives 4 & 5
Soils Map
New London, Connecticut

Legend

- Soil Unit
- Alternative 4
- Alternative 5

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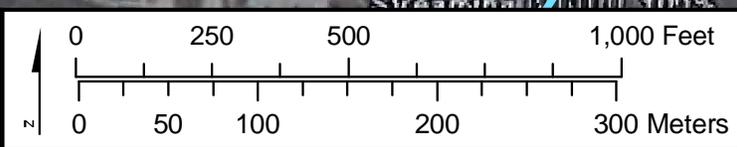
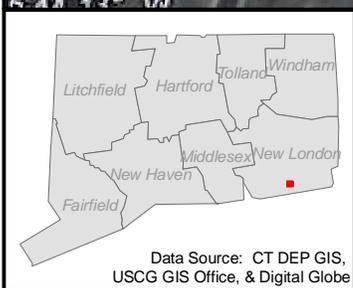
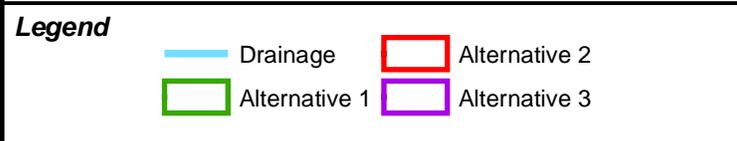
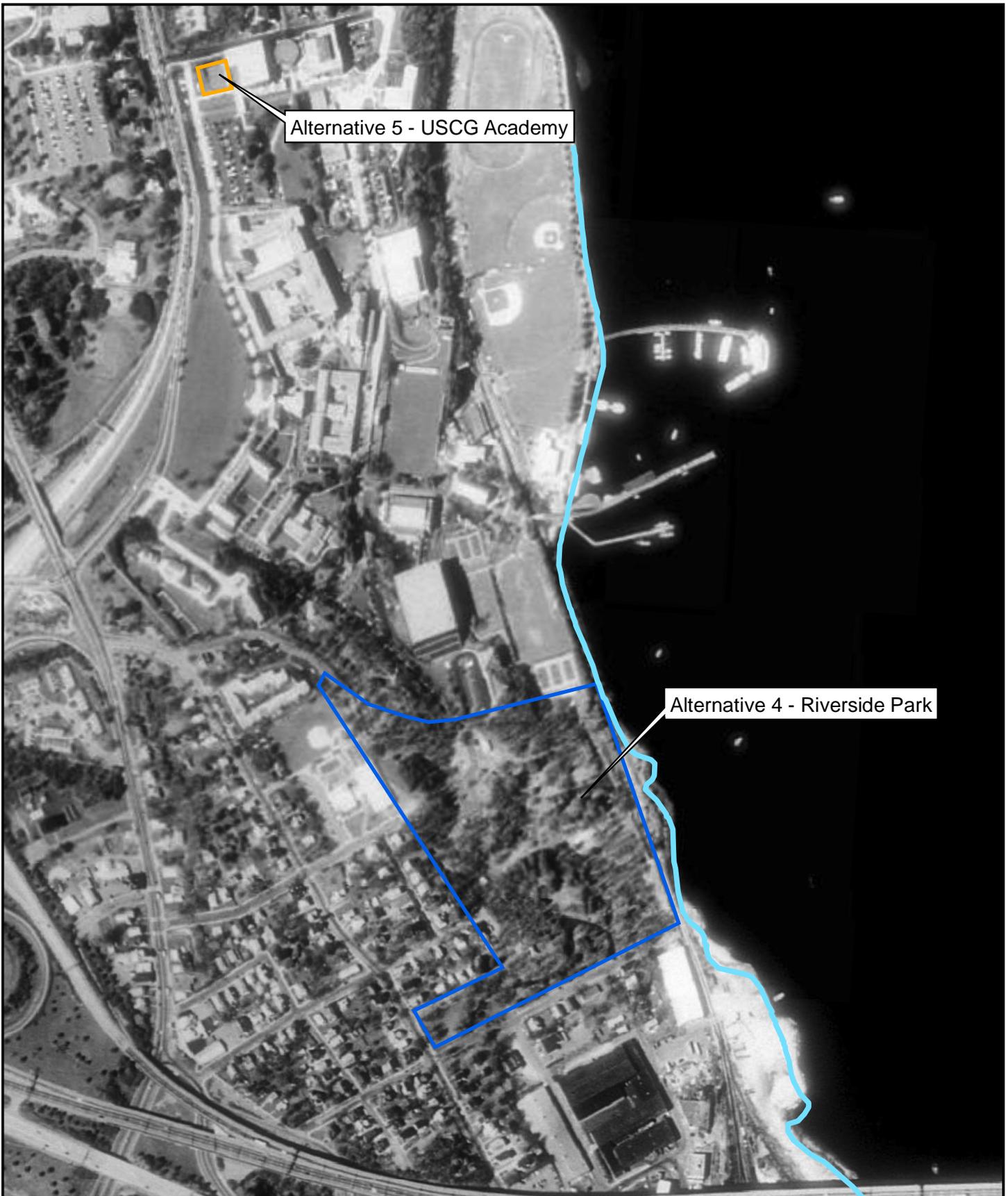


Figure 4-5a
Alternatives 1, 2, & 3
Drainage Map
New London, Connecticut

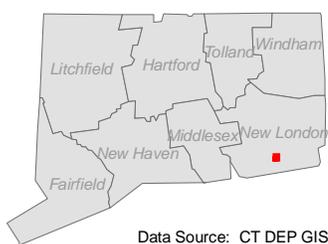


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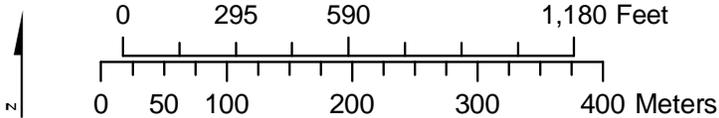


Alternative 5 - USCG Academy

Alternative 4 - Riverside Park



Data Source: CT DEP GIS, USCG GIS Office, & Digital Globe



Legend

- Drainage
- Alternative 4
- Alternative 5

Figure 4-5b
 Alternatives 4 & 5
 Drainage Map
 New London, Connecticut

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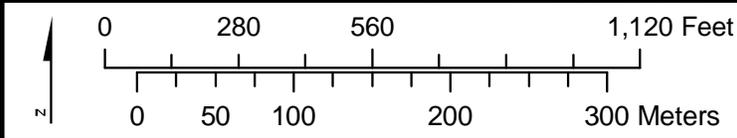
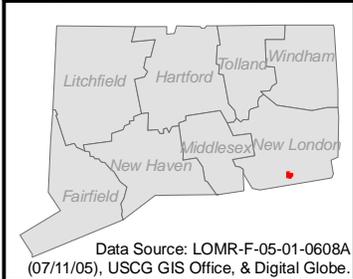
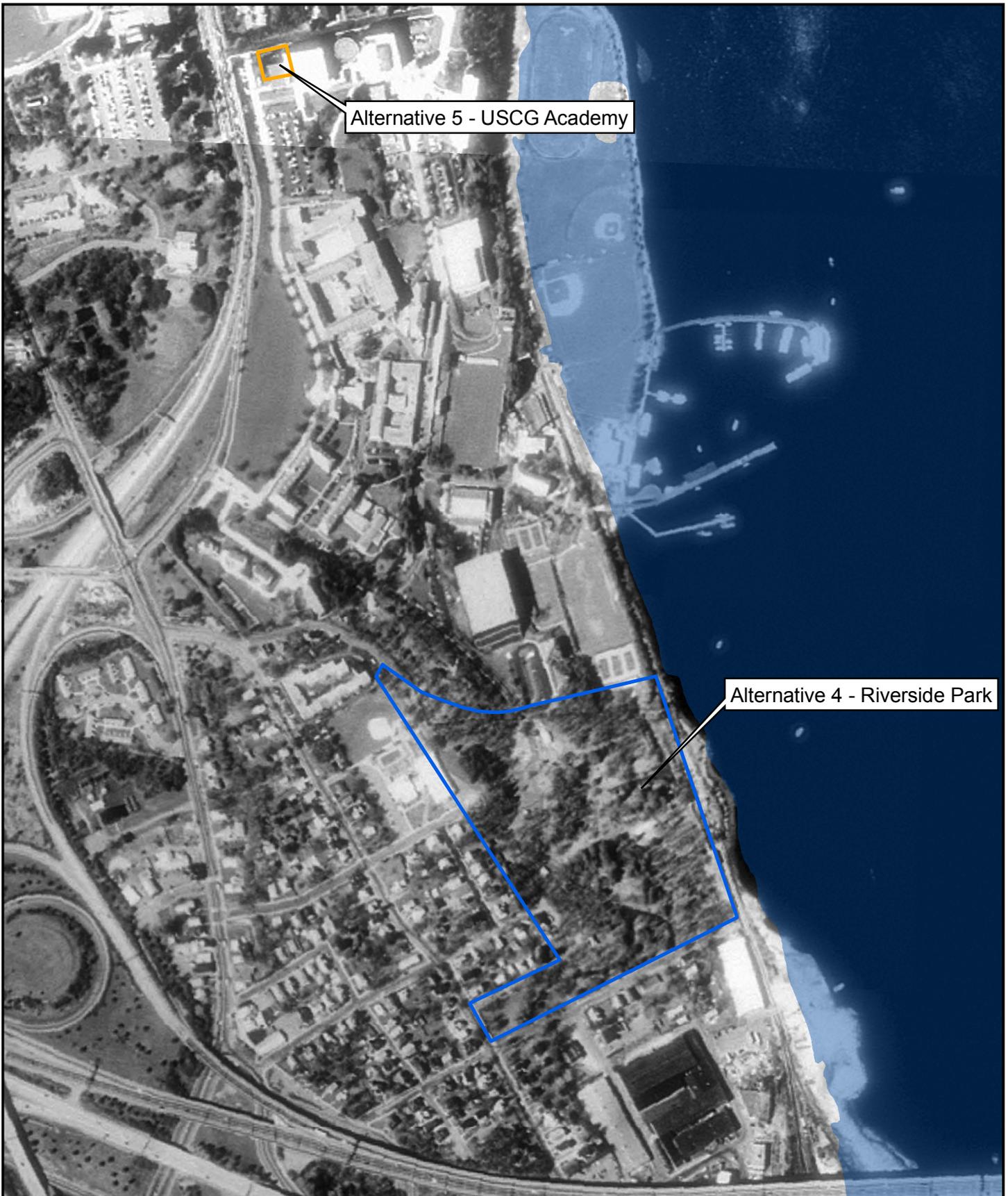


Figure 4-6a
 Alternatives 1, 2, & 3
 Floodplain Map
 New London, Connecticut

Legend	
	FEMA 100 Year Floodplain
	Alternative 1
	Alternative 2
	Alternative 3

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Alternative 5 - USCG Academy

Alternative 4 - Riverside Park

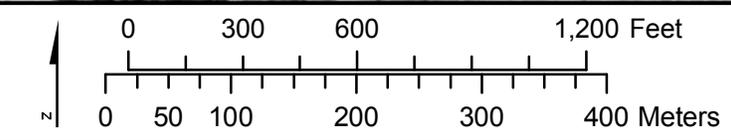
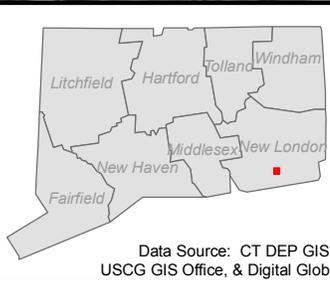


Figure 4-6b
 Alternatives 4 & 5
 Floodplain Map
 New London, Connecticut

Legend

- FEMA 100 Year Floodplain
- Alternative 4
- Alternative 5

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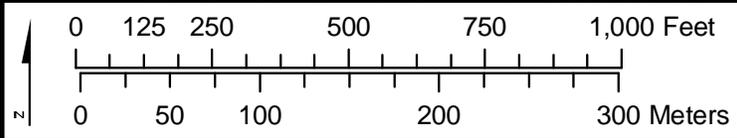
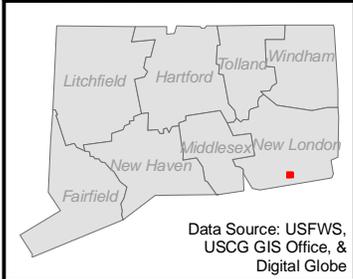
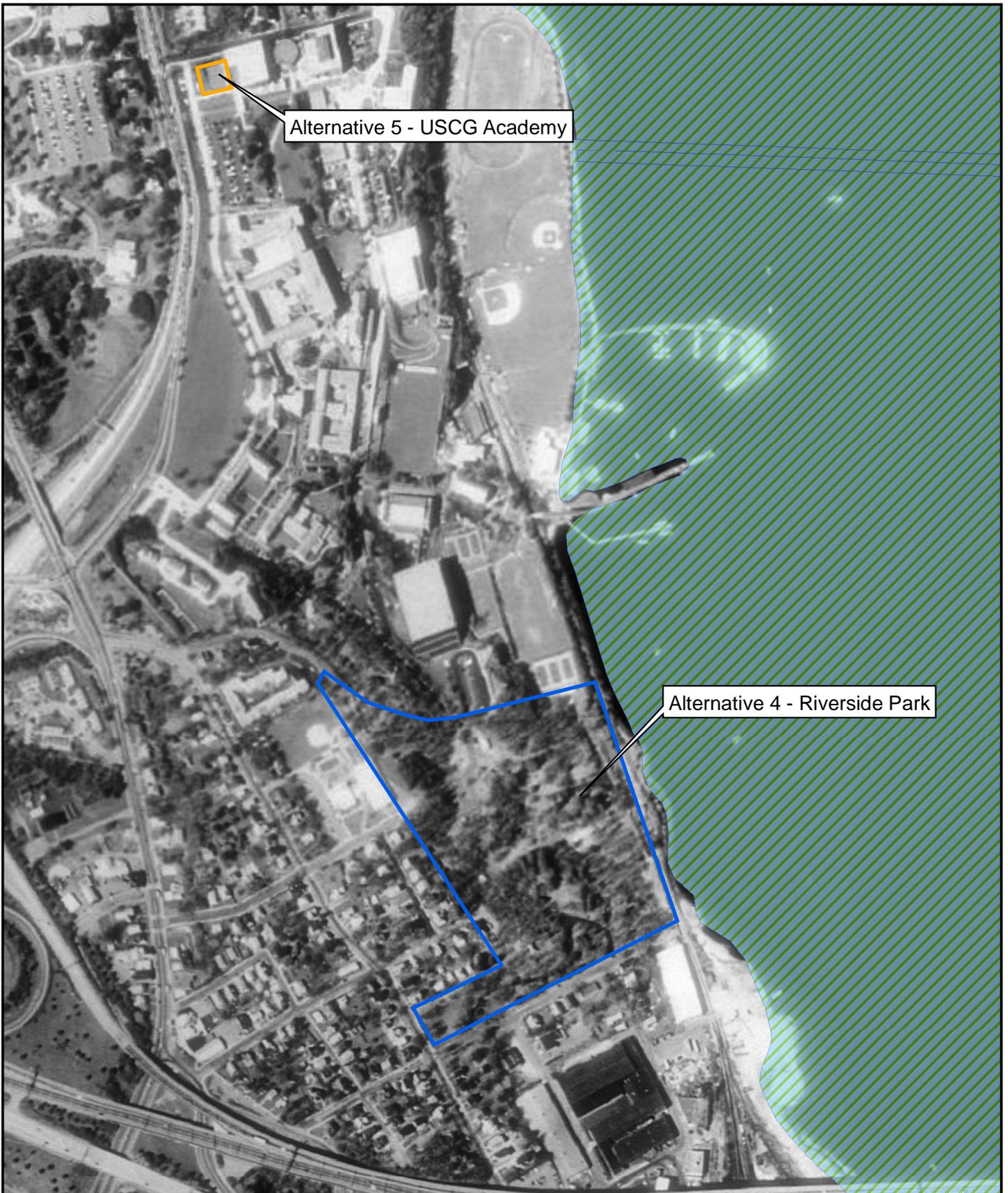


Figure 4-7a
 Alternatives 1, 2, & 3
 NWI Map
 New London, Connecticut

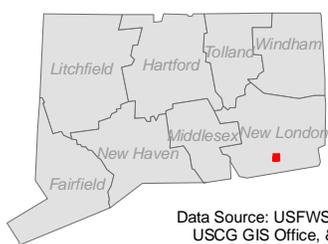


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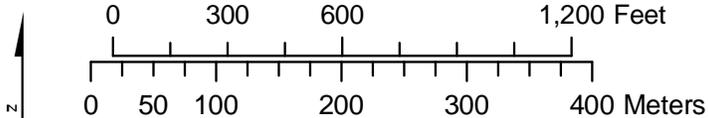


Alternative 5 - USCG Academy

Alternative 4 - Riverside Park



Data Source: USFWS, USCG GIS Office, & Digital Globe



Legend

-  Alternative 4
-  Alternative 5
-  NWI Wetland Estuarine & Marine Deepwater

Figure 4-7b
 Alternatives 4 & 5
 NWI Map
 New London, Connecticut

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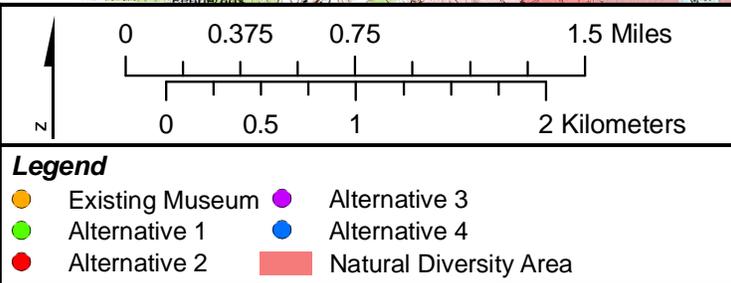
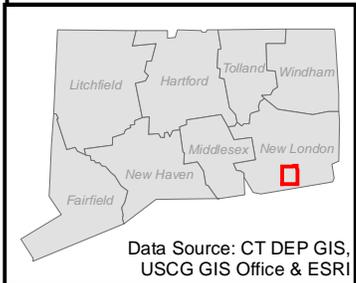
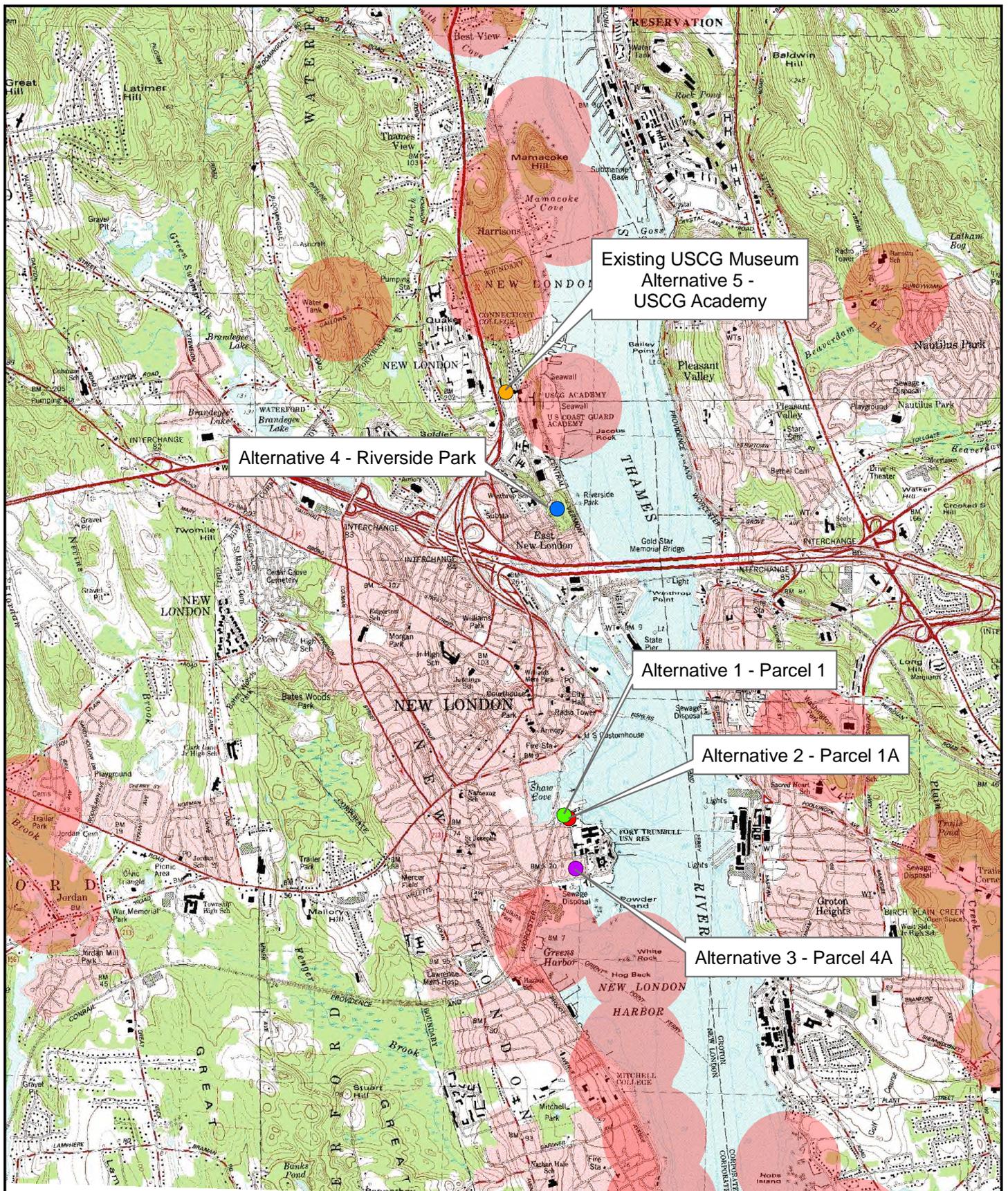


Figure 4-8
 State & Federal Listed Species
 & Significant Natural
 Communities Map
 New London, Connecticut

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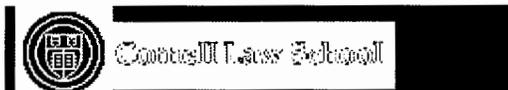


APPENDIX A

14 United States Code §98 New National Coast Guard Museum



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TITLE 14 > PART I > CHAPTER 5 > § 98

§ 98. National Coast Guard Museum

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How Current is This?

(a) Establishment.— The Commandant may establish a National Coast Guard Museum, on lands which will be federally owned and administered by the Coast Guard, and are located in New London, Connecticut, at, or in close proximity to, the Coast Guard Academy.

(b) Limitation on Expenditures.—

(1) Except as provided in paragraph (2), the Secretary shall not expend any appropriated Federal funds for the engineering, design, or construction of any museum established under this section.

(2) The Secretary shall fund the operation and maintenance of the National Coast Guard Museum with nonappropriated and non-Federal funds to the maximum extent practicable. The priority use of Federal operation and maintenance funds should be to preserve and protect historic Coast Guard artifacts.

(c) Funding Plan.— Before the date on which the Commandant establishes a museum under subsection (a), the Commandant shall provide to the Committee on Commerce, Science, and Transportation of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives a plan for constructing, operating, and maintaining such a museum, including—

(1) estimated planning, engineering, design, construction, operation, and maintenance costs;

(2) the extent to which appropriated, nonappropriated, and non-Federal funds will be used for such purposes, including the extent to which there is any shortfall in funding for engineering, design, or construction; and

(3) a certification by the Inspector General of the department in which the Coast Guard is operating that the estimates provided pursuant to paragraphs (1) and (2) are reasonable and realistic.

(d) Authority.— The Commandant may not establish a Coast Guard museum except as set forth in this section.

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APPENDIX B

NEPA Concepts and Terminology



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APPENDIX B

NEPA Concepts and Terminology

B.1 Agency and Public Involvement Process

As specified in the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), Department of Homeland Security (DHS) Management Directive (MD) 5100.1 – *Environmental Planning Program*, and the USCG Commandant Instruction (COMDTINST) M16475.1D – *NEPA Manual*, public participation is a significant component of the NEPA process. The following key public notification and participation events will occur as part of this environmental review process:

- The USCG conducted interagency and intergovernmental coordination for environmental planning (IICEP) pursuant to the requirements of NEPA as required under Executive Order (EO) 12372, which has since been superseded by EO 12416, *Intergovernmental Review of Federal Programs*, and subsequently supplemented by EO 13132. These agencies have also been furnished with copies of the Draft EA.
- The USCG, as the proponent of the proposed project will publish and distribute the Draft EA and Draft Finding of No Significant Impact (FONSI) for a 30-day public comment period. Notification of the availability of the Draft EA and Draft FONSI has been accomplished through publication of a legal Notice of Availability (NOA) in *The New London Day*, the local newspaper that services the region of New London, Connecticut. Furthermore, the Draft EA and Draft FONSI are available online at www.uscg.mil. Copies of the Draft EA, Draft FONSI and important reference documents are also available for public review at the New London Public Library. The USCG Director of Governmental and Public Affairs (CG-092) is the primary point of contact for any inquiries from the local news media. The USCG is responsible for receiving comments during the 30-day public comment period.
- The USCG conducted formal consultation with Federally-recognized Native American tribes, as required by Section 101(d)(6)(B) of National Historic Preservation Act (NHPA). These entities have been invited to participate in the EA process as an Indian tribe or Native Hawaiian organization, per Section 101(d)(6)(B). Where applicable, these entities have been furnished with copies of the Draft EA and Draft FONSI during its public circulation.
- The USCG will receive responses and/or comment letters from all interested parties in association with the public circulation of the Draft EA and Draft FONSI. Copies of received responses/comments on the Draft EA and Draft FONSI, as well as responses to these comments, will be provided in the Final EA, as appropriate.
- In order to document the availability of the Final EA and FONSI (if appropriate), the USCG will publish a NOA of the Final EA and FONSI in a manner similar to that described above. As the proponent, the USCG may not take any action, other than planning the proposal, until the FONSI has been signed by all appropriate officials.



B.2 Definition of Key Terms

B.2.1 Land Use

Land use includes natural conditions or human-modified conditions and activities occurring at a particular location. Human-modified land use categories include residential, commercial, industrial, transportation, communications, utilities, agricultural, institutional, recreational, and other developed use areas. Management plans and zoning regulations determine the type and extent of land use allowable in specific areas and are often intended to protect specially designated or environmentally sensitive areas.

B.2.2 Aesthetics and Visual Resources

Visual resources are defined as the natural and manufactured features that comprise an area's aesthetic qualities. These features form an observer's overall impression of an area or of its landscape character. Landforms, water surfaces, vegetation, and manufactured features are considered characteristic of an area if they are inherent to the structure and function of a landscape.

B.2.3 Floodplains

Floodplains are generally areas of low, level ground located on one or both sides of a stream channel that are subject to either periodic or infrequent inundation by floodwaters. Floodplains are most likely the result of the natural processes of lateral erosion and deposition that occur as a river valley widens. The porous material that composes the floodplain is conducive to retaining water that enters the soil via flooding events and elevated groundwater tables. Periodic inundation dangers associated with floodplains have prompted Federal, state, and local legislation to limit development in these areas to recreation, agriculture, and preservation activities. FEMA regulates floodplains with standards outlined in 44 CFR 60.3.

B.2.4 Wetlands

Wetlands are defined as areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances do or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth/reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas, such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

B.2.5 Cultural Resources

Cultural resources are prehistoric and historic sites, structures, districts, or any other physical evidence of human activity considered important to a culture, subculture, or a community for scientific, traditional, and/or religious reasons. For the purposes of this EA, based on statutory requirements, the term cultural resource is defined to include:

- Historic properties, as defined in the NHPA of 1966, as amended
- Cultural items, as defined in the Native American Graves Protection and Repatriation Act (NAGPRA)



- Archaeological resources, as defined in the Archeological Resources Protection Act (ARPA)
- Historic and paleontological resources, as defined by the Antiquities Act of 1906, as amended
- Sites that are scientifically significant, as defined by the Archeological and Historic Preservation Act (AHPA)
- Sacred sites, as defined in EO 13007, to which access and use is permitted under the American Indian Religious Freedom Act (AIRFA)
- Collections, as defined in 36 CFR 79, Curation of Federally Owned and Administered Collections.

In brief, cultural resources include archaeological, architectural, and traditional resources:

- **Archaeological resources** consist of locations where prehistoric or historic activity measurably altered the earth or produced deposits of physical remains, such as arrowheads and bottles.
- **Architectural resources** include standing buildings, districts, bridges, dams, and other structures of historic or aesthetic significance. Architectural resources generally must be more than 50 years old to be considered for inclusion in the National Register of Historic Places (NRHP), an inventory of culturally significant resources identified in the United States. However, more recent structures, such as Cold War-era resources, may warrant protection if they have the potential to gain significance in the future.
- **Traditional resources** include locations of historic occupations and events, historic and contemporary sacred and ceremonial areas, prominent topographical areas, traditional hunting and gathering areas, and other resources that Native Americans or other groups consider essential for the survival of their traditional culture.

B.2.6 Direct Versus Indirect Impacts

The terms *impact* and *effect* are used synonymously in this EA. Impacts may be determined to be beneficial or adverse, and may apply to the full range of natural, aesthetic, historic, cultural, and economic resources of the project study area and its environment. Definitions and examples of direct and indirect impacts are used in this EA as follows:

- **Direct Impact:** A direct impact is caused by the Proposed Action, and occurs at the same time and place as the Proposed Action.
- **Indirect Impact:** An indirect impact is caused by the Proposed Action and occurs later in time, or is farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in land use pattern, population density, or growth rate, and related effects on air, water, and other natural and social systems.
- **Application of Direct versus Indirect Impacts:** For direct impacts to occur, a resource must be present in a particular study area. For example, if vegetation resources were disturbed in a particular area, a direct impact to wildlife would occur as a result of displacement from available habitat. This displacement from habitat would



indirectly affect habitat in adjacent areas by increasing the wildlife population in those areas.

B.2.7 Short-Term Versus Long-Term Impacts

In addition to indicating if impacts are direct or indirect, this EA differentiates between short- and long-term impacts, where appropriate. In this context, “short term” and “long –term” do not refer to any rigid time period and are determined on a case-by-case basis in terms of anticipated consequences of the Proposed Action.

B.2.8 Cumulative Impacts

As described in **Section 2.0**, the USCG propose to acquire and operate a privately constructed new National Museum to provide a larger national museum to properly preserve, record and display its rich history and artifacts. **Sections 5.2** through **5.12** identify potential direct and indirect, short-term and long-term impacts associated with proposed actions under each of the specific project alternatives as identified in **Section 3.0**. **Section 5.13** evaluates the cumulative impact of the Proposed Action at the five proposed alternative locations combined with known existing, potential, or anticipated impacts associated with other local or regional activities currently being undertaken or anticipated by other landowners and decision-making authorities.

B.2.9 Significance Criteria

The term *significance* as used in NEPA requires consideration of both the context and intensity of the impact or effect under consideration. Significance can vary in relation to the context of the Proposed Action, the context of which may include consideration of effects on a national, regional, and/or local basis. Both short- and long-term effects may be relevant. Impacts are also evaluated in terms of their intensity. Factors contributing to the intensity of an impact include:

- The degree to which the action affects public health or safety
- The proximity of the action to resources that are legally protected by various statutes, such as wetlands; resources listed in, or eligible for, the NHRP; regulatory floodplains; and federally listed threatened or endangered species
- The degree to which the effects of the action on the quality of the human environment are likely to be highly uncertain or controversial
- Whether or not the action is related to other actions with individually insignificant but cumulatively significant impacts
- Whether or not the action threatens to violate Federal, state, or local law imposed for the protection of the environment.

B.2.10 Mitigation/Management

Mitigation/Management measures are discussed for each alternative, as appropriate. Where adverse impacts are identified, this document describes measures that would be used to



mitigate and/or manage these effects to acceptable levels, where possible. Mitigation/Management measures generally include:

- Avoiding the impact altogether by stopping or modifying the Proposed Action
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time through preservation and maintenance operations during the life of the action, such as implementation of appropriate and accepted Best Management Practices (BMPs)
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation and/or management of adverse impacts associated with alterations to the project study area are generally the responsibility of the USCG and the NCGMA. The mitigation/management measures taken to reduce or avoid the selected alternative's adverse environmental effects are included in the FONSI that will be prepared after a public review and a comment period are completed for the Draft EA (i.e., if the Draft EA determines that an EIS is not required). The FONSI will be included as an attachment to the Final EA. Only those mitigation/management measures that are practicable (i.e., can be accomplished as part of the primary action) have been identified.



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APPENDIX C

Applicable Laws and Executive Orders



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APPENDIX C Applicable Regulations

EXECUTIVE ORDERS (EO)	
EO 11593 – <i>Protection and Enhancement of the Cultural Environment</i>	All federal agencies are required to locate, identify, and record all cultural and natural resources. Cultural resources include sites of archaeological, historical, or architectural significance. Natural resources include the presence of endangered species, critical habitat, and areas of special biological significance.
EO 11988 – <i>Floodplain Management</i>	Requires federal agencies to provide leadership and to take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities for (1) acquiring, managing, and disposing of Federal lands and facilities; (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities.
EO 11990 – <i>Protection of Wetlands</i>	Requires federal agencies to avoid undertaking or providing assistance for new construction located in wetlands unless there is no practicable alternative, and all practicable measures to minimize harm to wetlands have been implemented.
EO 12088 – <i>Federal Compliance with Pollution Control Standards</i>	Requires federal agencies to ensure that all necessary actions are taken for the prevention, control, and abatement of environmental pollution with respect to federal facilities and activities.
EO 12372 – <i>Intergovernmental Review of Federal Programs (as amended by EO 12416)</i>	Requires federal agencies to foster an intergovernmental partnership and to strengthen federalism by relying on state and local processes for state and local coordination and review of proposed federal financial assistance.
EO 12856 – <i>Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements</i>	Requires federal agencies to plan for chemical emergencies. Facilities that store, use, or release certain chemicals are subject to various reporting requirements. Reported information is made available to the public.



<p>EO 12898, Environmental Justice.</p>	<p>Requires certain federal agencies, including the Department of Homeland Security (DHS), to the greatest extent practicable permitted by law, to make environmental justice part of their missions by identifying and addressing disproportionately high and adverse health or environmental effects on minority and low-income populations.</p>
<p>EO 13007 – <i>Indian Sacred Sites</i></p>	<p>Requires federal agencies to accommodate access to, and ceremonial use of, sacred sites by practitioners and avoid adversely affecting physical integrity of such sites.</p>
<p>EO 13045 – <i>Protection of Children from Environmental Health and Safety Risks</i></p>	<p>Makes it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children. It also directs agencies to ensure that policies, programs, activities, and standards address such risks if identified.</p>
<p>EO 13112 – <i>Invasive Species</i></p>	<p>Requires federal agencies to prevent the introduction of invasive species and to provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.</p>
<p>EO 13148 – <i>Greening the Government through Leadership in Environmental Management</i></p>	<p>Requires federal agencies to ensure that all necessary actions are taken to integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across all agency missions, activities, and functions. Environmental management considerations must be a fundamental and integral component of federal government policies, operations, planning, and management.</p>
<p>EO 13186 – <i>Responsibilities of Federal Agencies to Protect Migratory Birds</i></p>	<p>Requires federal agencies to take steps to protect migratory birds, including restoring and enhancing habitat, preventing or abating pollution affecting birds, and incorporating migratory bird conservation into agency planning processes whenever possible.</p>



FEDERAL LAWS	
American Indian Religious Freedom Act (42 United States Code (USC) 1996, Public Law (P.L.) 95-341)	Protects and preserves the rights of American Indians, Eskimos, Aleuts, and Native Hawaiians to exercise their traditional religions. These rights include, but are not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremony and traditional rites.
Antiquities Act of 1906 (16 USC 431-433, P.L. 59-209)	Provides and preserves historical and prehistoric ruins and objects of antiquity on lands owned or controlled by the federal government. Authorizes scientific investigation of antiquities on federal lands. Authorizes the establishment of national landmarks.
Archaeological and Historical Preservation Act, 16 USC 469.	Protects and preserves historical and archaeological data. Requires federal agencies to identify and recover data from archaeological sites threatened by their actions.
Archaeological Resources Protection Act of 1979 (16 USC 470 et seq., P.L. 96-95)	Enacted to preserve and protect resources and sites on federal and Indian lands. Fosters cooperation between governmental authorities, professionals, and the public. Prohibits the removal, sale, receipt, and interstate transportation of archaeological resources obtained illegally from public or Indian lands.
Clean Air Act (42 USC 7401-7671q) July 14, 1955, as amended	This Act, as amended, is known as the Clean Air Act of 1970. The amendments established the core of the clean air program. The primary objective is to establish federal standards for air pollutants. It is designed to improve air quality in areas of the country, which do not meet federal standards and to prevent significant deterioration in areas where air quality exceeds those standards.
Coastal Zone Management Act of 1972 (16 USC 1451-1464, P.L. 92-583)	Establishes a policy to preserve, protect, develop, and, where possible, restore and enhance the resources of the nation's coastal zone. Encourages and assists states through the development and implementation of coastal zone management programs.



<p>Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 USC 9601-9675, P.L. 96-510) amended by Superfund Amendments and Reauthorization Act of 1986 (SARA) (P.L. 99-499)</p>	<p>Also known as “Superfund,” provides for liability, compensation, cleanup, and emergency response for hazardous substances released into the environment and cleanup of inactive hazardous substances disposal sites. Also established a fund financed by hazardous waste generators to support cleanup and response actions.</p>
<p>Endangered Species Act of 1973, as amended (16 USC 1531 et seq., P.L. 93-205)</p>	<p>Protects threatened, endangered, and candidate species of fish, wildlife, and plants and their designated critical habitats. Under this law, no federal action is allowed to jeopardize the continued existence of an endangered or threatened species. The Endangered Species Act also requires consultation with United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Services (NMFS) and the preparation of a biological assessment when such species are present in an area that is affected by governmental activities.</p>
<p>Federal Property and Administrative Services Act of 1949.</p>	<p>Guides the process for transferring government property.</p>
<p>Federal Records Act of 1950, as amended</p>	<p>Requires federal agencies to preserve federal records of potential historic value.</p>
<p>Federal Water Pollution Control Act (Clean Water Act) (33 USC 1251-1387)</p>	<p>The Clean Water Act is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation’s waters. Primary authority for the implementation and enforcement rests with the U.S. Environmental Protection Agency (USEPA).</p>
<p>Fish and Wildlife Conservation Act Coordination Act (16 USC 661 et seq., P.L. Chapter 55)</p>	<p>The purpose of this Act is to ensure that wildlife conservation receives equal consideration and be coordinated with other features of water-resources development programs.</p>
<p>Historical Sites Act of 1935 (16 USC 461-467, P.L. Chapter 593)</p>	<p>Establishes a national policy to preserve for public use, historic sites, buildings, and objects of national significance.</p>
<p>Historical and Archaeological Data-Preservation (16 USC 469 et seq., P.L. 93-291)</p>	<p>Protects and preserves historical and archaeological data caused as a result of federal construction projects. Directs federal agencies to notify the Secretary of the Interior when the construction project may cause irreparable loss or destruction of significant resources or data. Provides a mechanism through which resources can be salvaged from a construction site.</p>



<p>Migratory Bird Treaty Act (16 USC 703-712)</p>	<p>Implements various treaties and is for the protection of migratory birds. Under the Act, taking, killing, or possessing migratory birds is unlawful.</p>
<p>National Environmental Policy Act of 1969 (NEPA), as amended (P.L. 91-190, 42 USC 4321 et seq.)</p>	<p>Requires federal agencies to utilize a systematic approach when assessing environmental impacts of government activities. NEPA proposes an interdisciplinary approach in a decision-making process designed to identify unacceptable or unnecessary impacts to the environment.</p>
<p>National Historic Preservation Act (NHPA) (16 USC 470 et seq.)</p>	<p>Requires federal agencies to take account of the effect of any federally assisted undertaking or licensing on any district, site, building, structure, or object eligible or listed for inclusion in the NRHP. Provides for the nomination, identification (through listing on the NRHP), and protection of historical and cultural properties of significance.</p>
<p>Noise Control Act of 1972 (42 USC 4901-4918, P.L. 92-574)</p>	<p>Establishes a national policy to promote an environment free from noise that jeopardizes their health and welfare. Authorizes the establishment of federal noise emissions standards and provides information to the public.</p>
<p>Resource Conservation and Recovery Act (RCRA) (42 USC 6901, P.L. 94-580)</p>	<p>Establishes requirements for safely managing and disposing of solid and hazardous waste and underground storage tanks. Federal agencies must comply with waste management requirements.</p>



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APPENDIX D

Interagency and Intergovernmental Coordination for Environmental Planning



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APPENDIX D

Interagency and Intergovernmental Coordination for Environmental Planning Contact List

Federal and Regional Agencies

United States Coast Guard Academy

Facilities Engineering Division
31 Mohegan Avenue
New London, CT 06320-8103
Attn: Catherine Jinkerson,
Secretary

United States Environmental Protection Agency

Region 1
1 Congress St.
Boston, MA 02114-2023
Attn: NEPA Coordinator

United States Fish & Wildlife Service

Northeast Regional Office
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Vaughn Douglass,
Lands & Development Program Chief

Federally-Recognized Native American Tribes

Eastern Pequot Reservation

Eastern Area Office
North Stonington, CT 06359

Golden Hill Paugussett

Golden Hill Indian Reservation
95 Stanavage Road
Trumbull, CT 06415

Mashantucket Pequot Tribal Nation

Eastern Area Office
P.O. Box 3060
Ledyard, CT 06339

The Mohegan Tribe

5 Crow Road
Uncasville, CT 06382



Paucatuck Eastern Pequot Tribe

Eastern Area Office
935 Lantern Hill Road
Ledyard, CT 06339

Schaghticoke Tribal Nation

33 Elizabeth Street
Derby, CT 06418

State and Local Agencies

City of New London

Parks and Recreation Department

181 State Street
New London, CT 06320
Attn: Tommie Major,
Director

City of New London

Office of Development & Planning

111 Union Street
New London, CT 06320
Attn: Bruce Hyde,
Director of Development and Planning

Connecticut Department of Environmental Protection

Office of Long Island Sound
Technical Services Section
79 Elm Street
Hartford, CT 06106-5127
Attn: Charles Evans,
Director

Connecticut Department of Environmental Protection

State Parks Division - Fort Trumbull State Park

79 Elm Street
Hartford, CT 06106-5127
Attn: Pamela Adams,
Director

New London County Soil & Water Conservation District

USDA Service Center
238 West Town Street
Norwich, CT 06360
Attn: Lenora J. Szruba,
Administrative Manager



New London Development Corporation

165 State Street, Suite 421
New London, CT 06320
Attn: Mr. John Brooks,
Waterfront Development Manager

Office of Connecticut State Archaeology

Box U-23
University of Connecticut
Storrs, CT 06106
Attn: Dr. Nicholas F. Bellantoni,
State Archaeologist

State Historic Preservation and Museum Division Office

One Constitution Plaza
Second Floor
Hartford, CT 06103
Attn: Karen Senich,
Deputy State Historic Preservation Officer



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2006 IICEP SUMITTAL



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U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001
Staff Symbol: COMDT (CG-092)
Phone: (202) 372-4600
Fax: (202) 372-4986
Email: Winston.e.leslie@uscg.mil

December 11, 2006

United States Department of Environmental Protection
Region 1
Attn: NEPA Coordinator
1 Congress St.
Boston, MA 02114-2023

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Proposed Future Acquisition and Operation of the Privately Constructed New National Coast Guard Museum in New London, Connecticut

Dear NEPA Coordinator:

The United States Coast Guard (USCG) is preparing an EA for the proposed future acquisition and operation of a privately constructed new National Coast Guard Museum in the City of New London, New London County, Connecticut (see **Figure 1**). The National Coast Guard Museum Association (NCGMA), a private non-profit organization, proposes to fund the construction of a new National Museum on land that will ultimately be donated to the USCG along with the completed Museum. The EA is being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 *et seq.*); Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Department of Homeland Security (DHS) Management Directive (DM) 5100.1, *Environmental Planning Program*; and the USCG Commandant Instruction (COMDTINST) M16475.1D, *USCG NEPA Manual*.

The proposed action includes:

- To accept the donation of both the land and the privately constructed new National Museum upon its completion.
- To operate and maintain a museum of at least 40,000 square feet, in addition to exterior exhibits and space for artifact storage in New London, Connecticut, within close proximity to the USCG Academy.
- To transfer USCG artifacts, curators, historians and documents from the Exhibition Center in Forestville, Maryland, and the current USGC Museum in New London, Connecticut, to the New National Museum.

The proposed new National Museum would offer a larger, centralized facility to properly record and display the USCG's rich history and artifacts. The Museum's required proximity to the USCG Academy is ideally suited to support institutional and field training.

This EA will provide a comparative analysis of three possible alternatives:

- Alternative 1: Preferred Project Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum upon the southern half of Parcel 1 (referred to as Parcel 1A) in the Fort Trumbull area of New London, Connecticut (see **Figure 2**). (*Please Note: The disputed Fort Trumbull property, Parcel 4, is not being*

December 11, 2006

Page 2

considered within this proposal as a possible alternative for the new National Coast Guard Museum.)

- Alternative 2: Riverside Park Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum at Riverside Park in New London, Connecticut (see **Figure 3**).
- Alternative 3: No Action Alternative – Continued operation of the USCG Museum at its present location at the USCG Academy in New London, Connecticut, and no Federal acquisition of land or construction and operation of a new National Museum (see **Figure 4**).

The USCG is currently identifying environmental resources, issues, and constraints associated with the proposed project areas, as identified above, in order to effectively assess potential environmental impacts associated with construction and operation of the proposed museum. The USCG is requesting baseline information regarding any concern that your Agency may have as related to the potential environmental issues at, or in the vicinity of, the three potential project locations. Information your Agency can provide in the vicinity of the sites would be appreciated.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We, and our contractor, AMEC Earth & Environmental, Inc. (AMEC), look forward to your participation in this NEPA review process. Your response on or before January 10, 2007 will enable us to complete this phase of the project within the scheduled timeframe. If you have any questions, do not hesitate to contact me at (202) 372-4600 or the mailing address listed below. If preferable, you may fax your response to us at (202) 372-4986.

Sincerely,



RDML Scott Burhoe
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593
(202) 372-4600 (ph)
(202) 372-4986 (fax)

cc: Mark Zill, USCG
Kebby Kelley, USCG
Brian Sariano, AMEC
Robert Michalkiewicz, AMEC

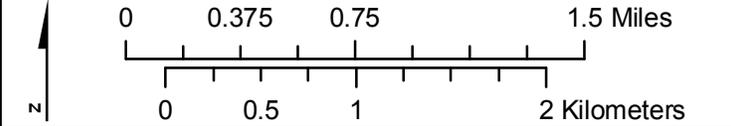
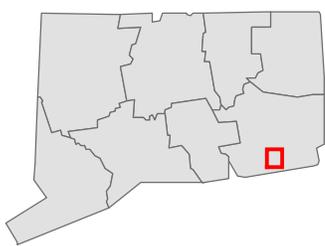
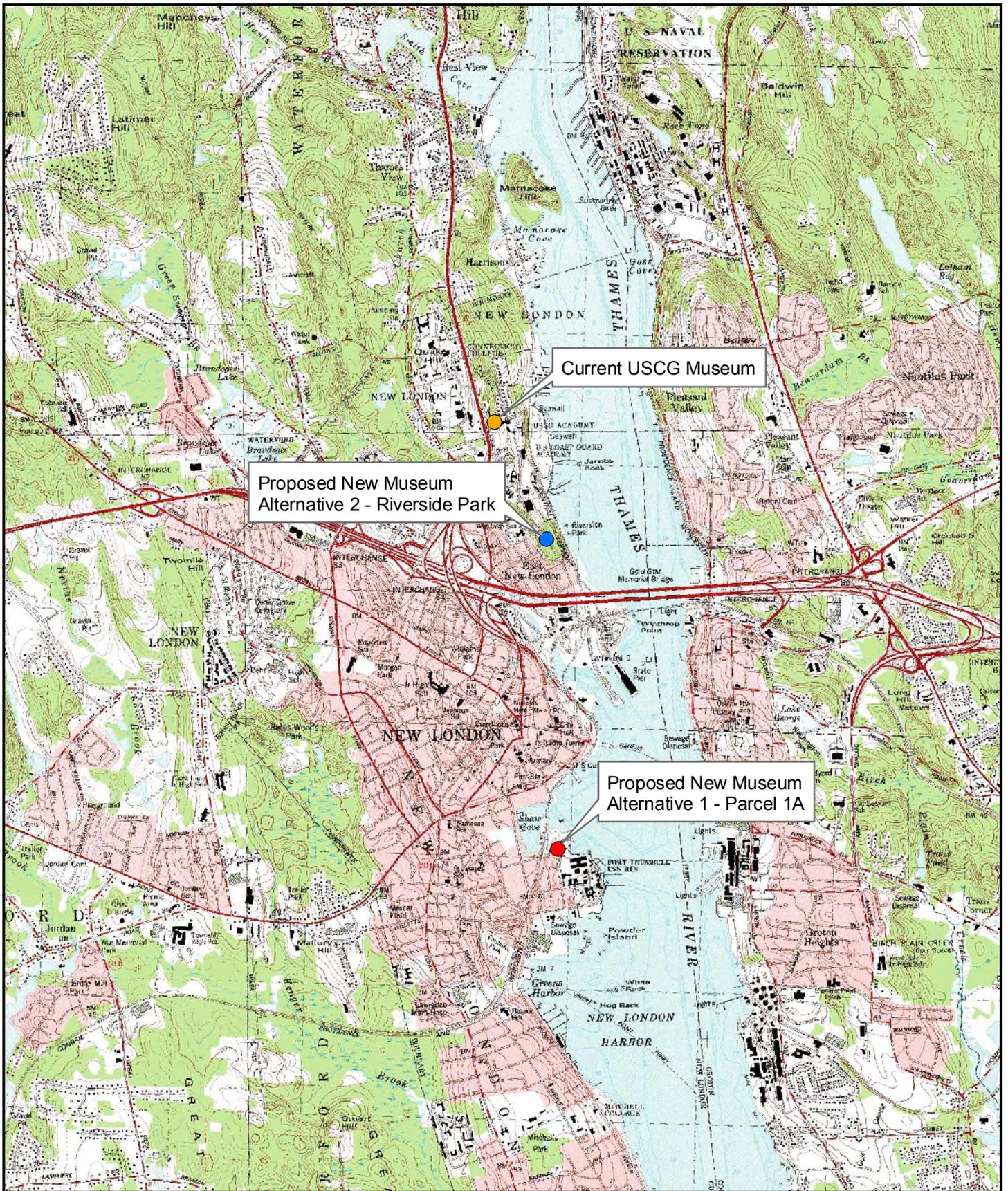


Figure 1
 Regional Location Map
 New London, Connecticut

Legend	<ul style="list-style-type: none"> ● Existing ● Alternative 1 ● Alternative 2
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amec
 EARTH & ENVIRONMENTAL, INC.
 One Plymouth Meeting, Suite 850
 Plymouth Meeting, PA 19462

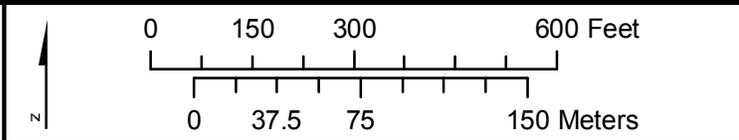
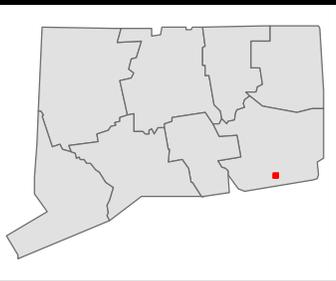


Figure 2
Alternative 1
Proposed New Museum
New London, Connecticut

Legend

 Approximate Site Boundary

amec
EARTH & ENVIRONMENTAL, INC.
One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462

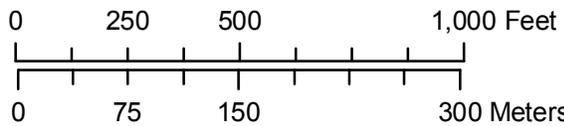
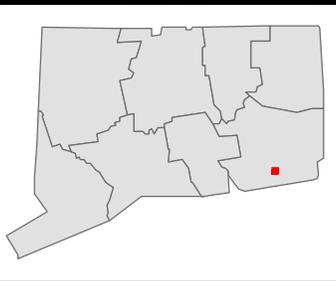


Figure 3
Alternative 2
Proposed New Museum
New London, Connecticut

Legend

 Approximate Site Boundary

amec
EARTH & ENVIRONMENTAL, INC.
One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462

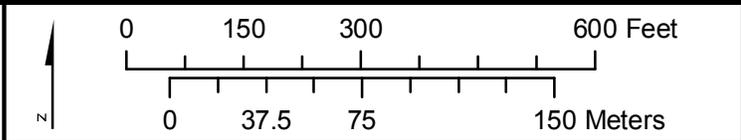
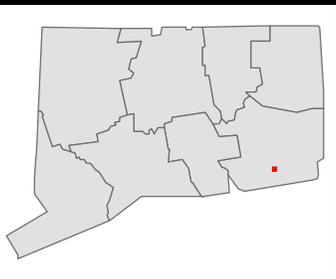
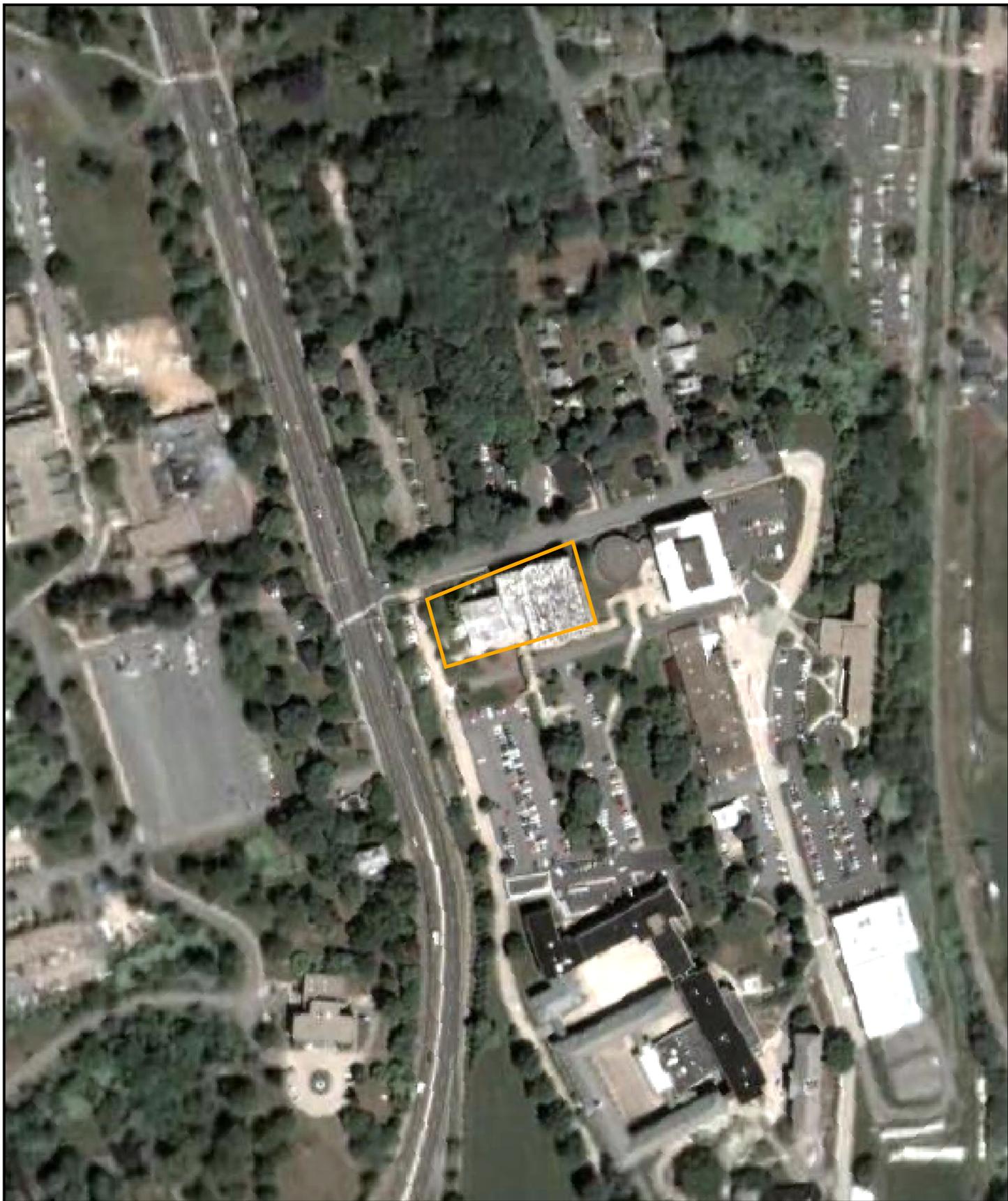


Figure 4
Current USCG Museum
New London, Connecticut

Legend

 Approximate Site Boundary

amec
EARTH & ENVIRONMENTAL, INC.
One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462



Attachment 1

Environmental Assessment for the Proposed Future Acquisition and Operation of a Privately Constructed New National Coast Guard Museum, New London Connecticut

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) Contact List

Federal and Regional Agencies

United States Coast Guard Academy

Facilities Engineering Division
31 Mohegan Avenue
New London, CT 06320-8103
Attn: Catherine Jinkerson,
Secretary

United States Department of Environmental Protection

Region 1
1 Congress St.
Boston, MA 02114-2023
Attn: NEPA Coordinator

United States Fish & Wildlife Service

Northeast Regional Office
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Vaughn Douglass,
Lands & Development Program Chief

Federally-Recognized Native American Tribes

Eastern Pequot Reservation

Eastern Area Office
North Stonington, CT 06359



Golden Hill Paugussett

Golden Hill Indian Reservation
95 Stanavage Road
Trumbull, CT 06415

Mashantucket Pequot Tribal Nation

Eastern Area Office
P.O. Box 3060
Ledyard, CT 06339

The Mohegan Tribe

5 Crow Road
Uncasville, CT 06382

Paucatuck Eastern Pequot Tribe

Eastern Area Office
935 Lantern Hill Road
Ledyard, CT 06339

Schadhticoke Tribal Nation

33 Elizabeth Street
Derby, CT 06418

State and Local Agencies

City of New London

Parks and Recreation Department

181 State Street
New London, CT 06320
Attn: Tommie Major,
Director

City of New London

Office of Development & Planning

111 Union Street
New London, CT 06320
Attn: Bruce Hyde,
Director of Development and Planning

Connecticut Department of Environmental Protection

Office of Long Island Sound
Technical Services Section
79 Elm Street
Hartford, CT 06106-5127
Attn: Charles Evans,
Director



**Connecticut Department of Environmental Protection
State Parks Division - Fort Trumbull State Park**

79 Elm Street
Hartford, CT 06106-5127
Attn: Pamela Adams,
Director

New London County Soil & Water Conservation District

USDA Service Center
238 West Town Street
Norwich, CT 06360
Attn: Lenora J. Szruba,
Administrative Manager

New London Development Commission

165 State Street, Suite 421
New London, CT 06320
Attn: Mr. John Brooks,
Waterfront Development Manager

Office of Connecticut State Archaeology

Box U-23
University of Connecticut
Storrs, CT 06106
Attn: Dr. Nicholas F. Bellantoni,
State Archaeologist

State Historical Preservation and Museum Division Office

59 South Prospect Street
Hartford, CT 06106
Attn: J. Paul Loether,
Acting Director/Deputy State Historic Preservation Officer



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2008 IICEP SUBMITTAL



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U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001
Staff Symbol: COMDT (CG-092)
Phone: (202) 372-4600
Fax: (202) 372-4986
Email: Winston.e.leslie@uscg.mil

24 Jan 2008

United States Coast Guard Academy
Facilities Engineering Division
Attn: Catherine Jinkerson, Secretary
31 Mohegan Avenue
New London, CT 06320-8103

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Proposed Future Acquisition and Operation of the Privately Constructed New National Coast Guard Museum in New London, Connecticut

Dear Mrs. Jinkerson:

The United States Coast Guard (USCG) is preparing an EA for the proposed future acquisition and operation of a privately constructed new National Coast Guard Museum in New London, Connecticut (see **Figure 1**). Initial consultation was conducted with your organization in December 2006 and a draft EA was released to the public on 10 May 2007. Upon completion of the 60-day public comment period and based on comments received, the USCG re-evaluated the alternative locations identified in the EA. The EA will be updated to analyze two additional alternatives (five alternative locations total), and will be re-distributed for an additional public comment period.

The National Coast Guard Museum Association (NCGMA), a private non-profit organization, proposes to fund the construction of a new National Museum on land that will ultimately be donated to the USCG along with the completed Museum. The EA is being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 *et seq.*); Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); Department of Homeland Security (DHS) Management Directive (DM) 5100.1, *Environmental Planning Program*; and the USCG Commandant Instruction (COMDTINST) M16475.1D, *USCG NEPA Manual*.

The proposed action includes:

- To accept the donation of both the land and the privately constructed new National Museum upon its completion.
- To operate and maintain a museum of at least 40,000 square feet, in addition to exterior exhibits and space for artifact storage in New London, Connecticut, within close proximity to the USCG Academy.
- To transfer USCG artifacts, curators, historians and documents from the Exhibition Center in Forestville, Maryland, and the current USGC Museum in New London, Connecticut, to the New National Museum.

The proposed new National Museum would offer a larger, centralized facility to properly record and display the USCG's rich history and artifacts. The Museum's required proximity to the USCG Academy is ideally suited to support institutional and field training and education.

This EA will provide a comparative analysis of five possible alternatives:

- Alternative 1: Parcel 1 Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum upon Parcel 1, a combination of Parcel 1A and 1B, in the Fort Trumbull area of New London, Connecticut (see **Figure 2**).

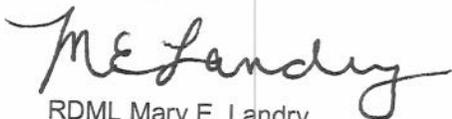
- Alternative 2: Parcel 1A Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum upon Parcel 1A in the Fort Trumbull area of New London, Connecticut (see **Figure 3**).
- Alternative 3: Parcel 4A Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum upon Parcel 4A in the Fort Trumbull area of New London, Connecticut (see **Figure 4**).
- Alternative 4: Riverside Park Alternative – Federal acquisition and operation of a privately constructed new National Coast Guard Museum at Riverside Park in New London, Connecticut (see **Figure 5**).
- Alternative 5: No Action Alternative – Continued operation of the USCG Museum at its present location at the USCG Academy in New London, Connecticut, and no Federal acquisition of land or construction and operation of a new National Museum (see **Figure 6**).

The USCG is currently identifying environmental resources, issues, and constraints associated with the proposed project areas, as identified above, in order to effectively assess potential environmental impacts associated with construction and operation of the proposed museum. The USCG is requesting baseline information regarding any concern that you may have as related to the potential environmental issues, or other issues of concern, at, or in the vicinity of, the four potential project locations, and the no action alternative at the USCG Academy. Any information you can provide that might be pertinent to the alternatives being analyzed would be appreciated.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We, and our contractor, AMEC Earth & Environmental, Inc. (AMEC), look forward to your participation in this NEPA review process. Your response on or before 13 February 2008 will enable us to complete this phase of the project within the scheduled timeframe. If you have any questions, do not hesitate to contact me at (202) 372-4600 or the mailing address listed below. If preferable, you may fax your response to us at (202) 372-4986.

Sincerely,



RDML Mary E. Landry
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593
(202) 372-4600 (ph)
(202) 372-4986 (fax)

cc: Mark Zill, USCG
Daniel Koski-Karell, Ph.D., USCG
Brian Sariano, AMEC
Robert Michalkiewicz, AMEC

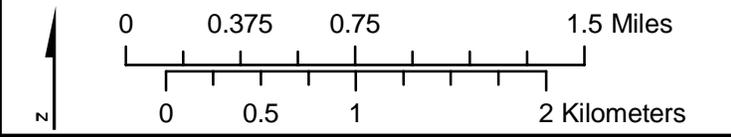
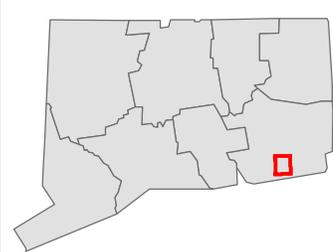
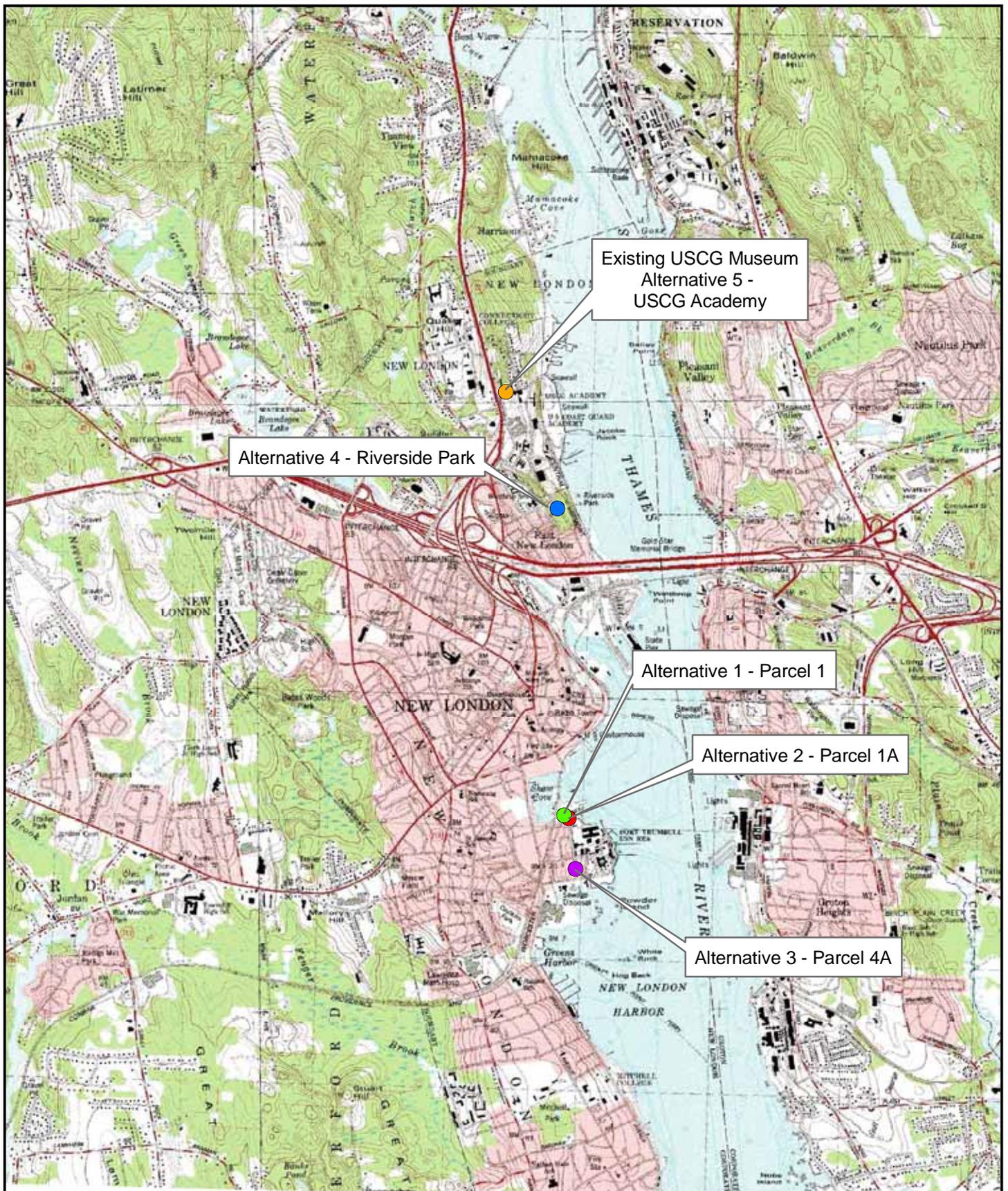


Figure 1
Regional Location Map
New London, Connecticut

Legend	
●	Existing Museum
●	Alternative 1
●	Alternative 2
●	Alternative 3
●	Alternative 4

amec
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One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462

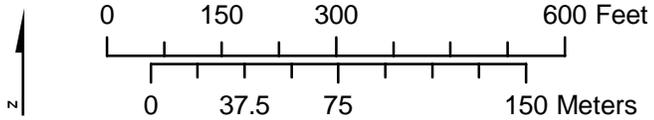
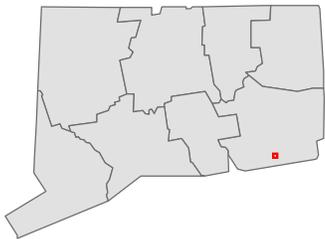


Figure 2
Alternative 1
Parcel 1 - Fort Trumbull
New London, Connecticut

Legend

-  Approximate Site Boundary
Parcel 1 - Fort Trumbull Area

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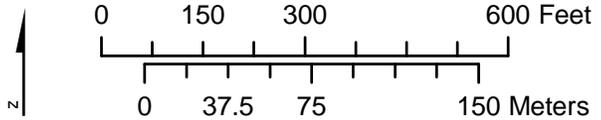
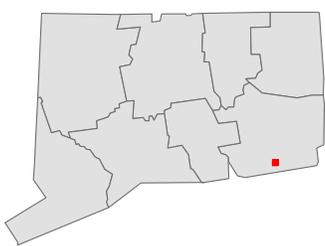


Figure 3
 Alternative 2
 Parcel 1A - Fort Trumbull
 New London, Connecticut

Legend

- Approximate Site Boundary
Parcel 1A - Fort Trumbull Area

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 Plymouth Meeting, PA 19462

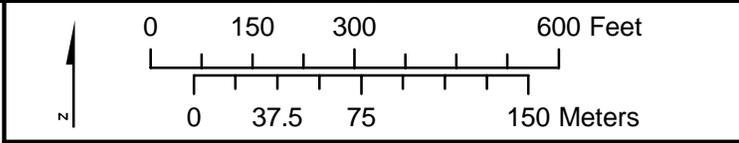
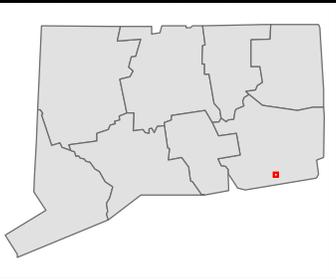
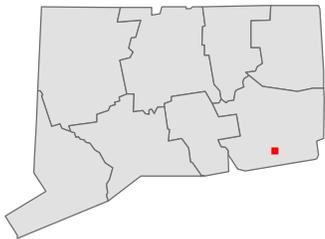


Figure 4
 Alternative 3
 Parcel 4A - Fort Trumbell
 New London, Connecticut

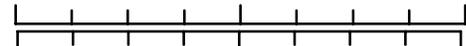
Legend

 Approximate Site Boundary
 Parcel 4A - Fort Trumbell Area

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 One Plymouth Meeting, Suite 850
 Plymouth Meeting, PA 19462



0 250 500 1,000 Feet



0 75 150 300 Meters

Legend

 Approximate Site Boundary
Riverside Park

Figure 5
Alternative 4
Riverside Park
New London, Connecticut

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One Plymouth Meeting, Suite 850
Plymouth Meeting, PA 19462

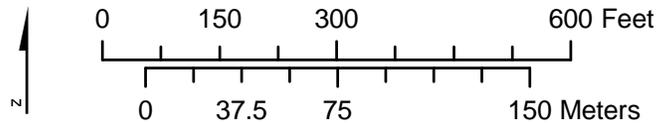
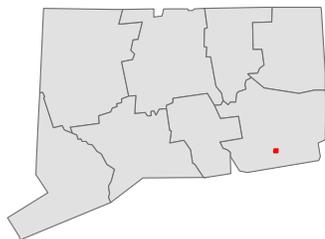
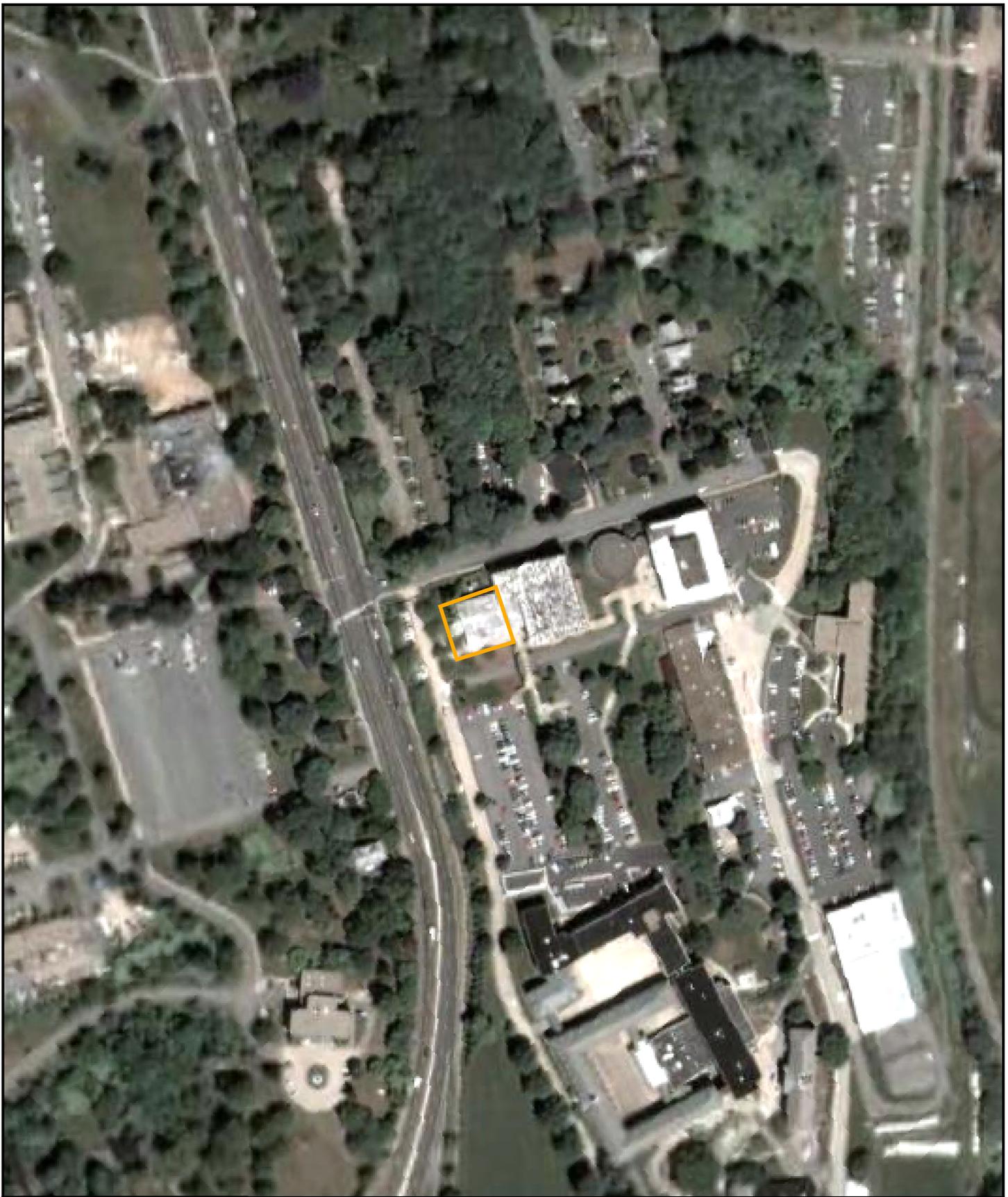


Figure 6
 Alternative 5
 USCG Academy
 New London, Connecticut

Legend

- Approximate Site Location
- Waesche Hall - USCG Academy



EARTH & ENVIRONMENTAL, INC.
 One Plymouth Meeting, Suite 850
 Plymouth Meeting, PA 19462



Attachment 1

Environmental Assessment for the Proposed Future Acquisition and Operation of a Privately Constructed New National Coast Guard Museum, New London Connecticut

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) Contact List

Federal and Regional Agencies

United States Coast Guard Academy

Facilities Engineering Division
31 Mohegan Avenue
New London, CT 06320-8103
Attn: Catherine Jinkerson,
Secretary

United States Department of Environmental Protection

Region 1
1 Congress St.
Boston, MA 02114-2023
Attn: NEPA Coordinator

United States Fish & Wildlife Service

Northeast Regional Office
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Vaughn Douglass,
Lands & Development Program Chief

Federally-Recognized Native American Tribes

Eastern Pequot Reservation

Eastern Area Office
North Stonington, CT 06359



Golden Hill Paugussett

Golden Hill Indian Reservation
95 Stanavage Road
Trumbull, CT 06415

Mashantucket Pequot Tribal Nation

Eastern Area Office
P.O. Box 3060
Ledyard, CT 06339

The Mohegan Tribe

5 Crow Road
Uncasville, CT 06382

Paucatuck Eastern Pequot Tribe

Eastern Area Office
935 Lantern Hill Road
Ledyard, CT 06339

Schadhticoke Tribal Nation

33 Elizabeth Street
Derby, CT 06418

State and Local Agencies

City of New London

Parks and Recreation Department

181 State Street
New London, CT 06320
Attn: Tommie Major,
Director

City of New London

Office of Development & Planning

111 Union Street
New London, CT 06320
Attn: Bruce Hyde,
Director of Development and Planning

Connecticut Department of Environmental Protection

Office of Long Island Sound
Technical Services Section
79 Elm Street
Hartford, CT 06106-5127
Attn: Brian Thompson,
Director



**Connecticut Department of Environmental Protection
State Parks Division - Fort Trumbull State Park**

79 Elm Street
Hartford, CT 06106-5127
Attn: Pamela Adams,
Director

New London County Soil & Water Conservation District

USDA Service Center
238 West Town Street
Norwich, CT 06360
Attn: Lenora J. Szruba,
Administrative Manager

New London Development Commission

165 State Street, Suite 421
New London, CT 06320
Attn: Mr. John Brooks,
Waterfront Development Manager

Office of Connecticut State Archaeology

Box U-23
University of Connecticut
Storrs, CT 06106
Attn: Dr. Nicholas F. Bellantoni,
State Archaeologist

State Historical Preservation and Museum Division Office

59 South Prospect Street
Hartford, CT 06106
Attn: Ms. Karen Senich,
Interim Division Director/Deputy State Historic Preservation Officer



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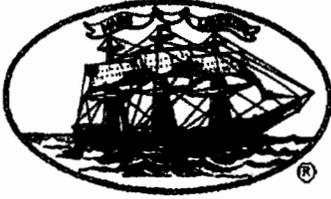


Summary of Agency Correspondence Received

Date	Agency	Description
20 December 2006	City of New London, Office of Development and Planning	No environmental information for the Riverside Park Area. Several other proposals have been submitted for Riverside Park, including a children’s museum.
20 December 2006	Connecticut Commission on Culture & Tourism, Historic Preservation and Museum Division	Preliminary design plans should be submitted for review if Fort Trumbull area is chosen. Riverside Park possesses moderate to high sensitivity for prehistoric and historic archaeological resources, a professional reconnaissance survey is recommended prior to any construction.
10 January 2007	State of Connecticut Department of Environmental Protection, Office of Long Island Sound Programs	Parcel 1A is preferred over utilizing the Riverside Park area. The only concern is the overall level of water-dependent uses within the Fort Trumbull area.



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City of New London

Office of Development and Planning
111 Union Street • New London, CT 06320
Phone (860) 447-5203 • Fax (860) 437-4467

December 20, 2006

Rear Admiral Scott Burho
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 Second Street Southwest
Washington, DC 20593

Dear Rear Admiral Burho:

Thank you for your letter concerning the environmental assessment for the proposed National Coast Guard Museum in New London. We have a significant amount of information on file for the Fort Trumbull location. However, a better source of information, as I am sure you know, is the New London Development Corporation which is in charge of the Fort Trumbull Municipal Development Plan. It is my understanding that your contractor, AMEC Earth and Environmental Inc., has already been in touch with the New London Development Corporation to gather that information.

To my knowledge there is no environmental information with respect to contaminated soil for the Riverside Park Area. Any information we have on Riverside Park would be limited to land records currently on file with the City Engineer. In addition, my office has received several proposals for Riverside Park most notably for a children's museum. We have records that would normally be associated with that type of proposal.

We look forward to working with you on this important project. I would be happy to discuss any aspect of this project with you or your consultant. Please feel free to contact me at (860) 447- 5247.

I believe that the numbering of the attachments may be inconsistent with the text of the letter. I believe the preferred project alternative Fort Trumbull is figure 3 and not figure 2. Attachment 2 is actually figure 4 and Attachment 3 is figure 2 not figure 4.

Sincerely,

A handwritten signature in black ink that reads "Bruce Hyde". The signature is written in a cursive, flowing style.

Bruce Hyde
Director, Development & Planning

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Connecticut Commission on Culture & Tourism

December 20, 2006

Historic Preservation
& Museum Division

RDML Scott Burhoe
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2199 2nd Street SW
Washington, DC 20593

59 South Prospect Street
Hartford, Connecticut
06106

Subject: National Coast Guard Museum
New London, CT

(v) 860.566.3005
(f) 860.566.5078

Dear Mr. Burhoe:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the United States Coast Guard Academy has extensive and significant historical, and contemporary, association with the City of New London and the State of Connecticut. In this regard, we believe that the United States Coast Guard Academy possesses historic and architectural importance and is eligible for the National Register of Historic Places.

The State Historic Preservation Office notes that Alternative 2, Riverside Park, possesses moderate to high sensitivity for prehistoric and historic archaeological resources. Therefore, we recommend that a professional reconnaissance survey be undertaken to identify and evaluate archaeological resources which may exist within proposed project limits, including, equipment storage and associated work areas. All archaeological studies must be undertaken in accordance with our *Environmental Review Primer for Connecticut's Archaeological Resources*. No ground disturbance or construction-related activities should be initiated until this office has had an opportunity to review and comment upon the recommended archaeological survey report.

The State Historic Preservation Office notes that Alternative 1, Fort Trumbull area, is located in immediate proximity to Fort Trumbull and the Downtown New London Historic District, which are listed on the National Register of Historic Places. In this regard, preliminary design plans should be provided to our professional staff in order that further technical analysis may be undertaken regarding potential visual effects upon these important historic resources.



National Coast Guard Museum
New London, CT
Page 2

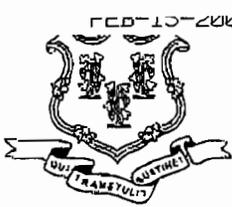
This office strongly supports and endorses the proposed location of the National Coast Guard Museum within the City of New London. We look forward to additional coordination with the United States Coast Guard regarding the expeditious furtherance of this important project as well as the professional management of Connecticut's cultural heritage pursuant to the National Historic Preservation Act.

For further assistance, please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA



DEP OLISP 860 424 4054 P.02/05
STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



January 10, 2007

RDML Scott Burhoe
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593

RE: Interagency and Intergovernmental Coordination for Environmental Planning for the Environmental Assessment for the Proposed Future Acquisition and Operation of the Privately Constructed New National Coast Guard Museum in New London, CT

Dear MR. Burhoe,

Thank you for the opportunity to assist the USCG in identifying environmental resources, potential development constraints, and issues associated with the location and construction of a new National Coast Guard Museum in New London.

We have reviewed the possible locations and offer the following comments for your consideration. From a coastal management and environmental protection standpoint, construction and operation of a museum on Parcel 1A in the Fort Trumbull Municipal Development Plan (MDP) area is preferable to utilizing the Riverside Park location. Parcel 1A is a remediated brownfield that has already been improved with utilities and infrastructure in anticipation of development whereas Riverside Park is a public park located within a predominately urban environment that is largely undeveloped, provides recreation, and contains forested open space. Additionally, the site's steep topography makes development of Riverside Park more problematic in terms of controlling erosion and sedimentation during construction and managing stormwater runoff post construction. Finally, parcel 1A may afford the opportunity, due to its proximity to the water and the wharf on the adjacent parcel to the north, for the Coast Guard to incorporate water related exhibits in and along the Thames River waterfront. For these reasons, and others, we believe that locating the new National Coast Guard Museum on parcel 1A is more appropriate from both a land-use and environmental protection perspective.

Given the proximity of parcel 1A to the wharf located on the adjacent parcel 1B, which could provide access to relatively deep water, we understand that there is interest by the USGC in berthing the USCG Cutter Eagle at a pier connected to the wharf. You should be aware that redevelopment of the Fort Trumbull MDP area required an exemption to the State's Flood Management Certification process in accordance with section 25-68d of the Connecticut General Statutes to allow the proposed development plan to move forward. As a condition of the exemption issued by the Commissioner of the Department of Environmental Protection (DEP),

the overall level of water-dependent uses within the MDP area were required to be maintained. We are aware that the New London Development Corporation (NLDC), which controls parcel 1A, is currently planning to relocate New London Seafood from the wharf to an alternative location outside the MDP area. Meeting the condition of maintaining the overall level of water-dependency will need to be addressed as plans to reuse the wharf and the surrounding in-water area develop. This may or may not involve the USCG depending on whether the USCG remains interested in developing the waterfront area associated with parcel 1B. Regardless, we are available to assist the USCG and the NLDC in evaluating project developments with regard to their water-dependency as future options develop to ensure that the conditions in the exemption are met.

We look forward to coordinating with all agencies and organizations involved in implementing the Fort Trumbull MDP. If you have any questions or need additional information, please contact John Gaucher of my staff at (860) 424-3660.

Sincerely,



Brian P. Thompson
Director
Office of Long Island Sound Programs

cc: John Brooks, NLDC
Bruce Hyde, Office of Development & Planning, City of New London
Pamela Adams, DEP State Parks Division
Peter Simmons, DECD
Betsey Wingfield, Bureau Chief, DEP WPLR
Art Christian, DEP IWRD



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Summary of Agency Correspondence Received

Date	Agency	Description
5 February 2008	New London Development Corporation	The NLDC responded to the IICEP letter through a description of both positive and negative impacts of each alternative associated with the new National Museum.
13 February 2008	State of Connecticut Department of Environmental Protection, Office of Long Island Sound Programs	The reuse of Parcel 1 for the new National Museum would be required to adhere with the MDP requirement of the water-dependency of the MDP area. Additionally, a change in the use of the parcel may require a modification to the MDP. Contact with the NLDC and the Connecticut Department of Economic and Community Development was suggested.
20 February 2008	Connecticut Commission on Culture & Tourism, Historic Preservation and Museum Division	Parcel 4A does not contain any historic, architectural or archaeological resources; however, it is located in immediate proximity to Fort Trumbull. Design plans for the new National Museum must be reviewed by the Connecticut Commission on Culture & Tourism for any visual impacts to Fort Trumbull.



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DEVELOPMENT CORPORATION

February 5, 2008

RDML Mary E. Landry
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593

RE: Response to Intergovernmental and Interagency Environmental Planning for the Environmental Assessment for the Proposed National Coast Guard Museum in New London

Dear Admiral Landry:

I am pleased to provide input on the Environmental Assessment (EA) for the proposed National Coast Guard Museum in New London. The following comments are provided by site.

Fort Trumbull MDP Parcel 1A (Alternative 2) is the 2.7-acre site designated by the New London Development Corporation (NLDC) as the preferred site for the National Coast Guard Museum. Most of the site consists of former U.S. Navy land (Naval Undersea Warfare Center or NUWC). The site has been remediated, and significant site grading has taken place to prepare the site for future development. All new underground infrastructure is in place, and access is provided by a new tree-lined boulevard extension of Nameaug Street. All road improvements leading to the site have been completed for the anticipated full build-out of the Fort Trumbull area, and have been designed to accommodate future traffic requirements of this development, including the National Coast Guard Museum.

- There are no streams, wetlands, open water features or local aquifers on the site. With the exception of a de-minimus sliver in the southeastern corner of the site (adjacent to the City of New London's Fort Trumbull Riverwalk), the entire site is above the 100-year floodplain. The site has no direct waterfront, but has unobstructed waterviews across the Riverwalk, which is located between the site and the waters edge. Riparian access for mooring vessels drawing up to 20' is available at the proposed marina site off the adjacent (hotel) Parcel 1B.
- Soil data has been provided to your consultants, and a significant amount of geo-technical borings and research on the site has been conducted.
- There are no threatened or endangered species on the site, nor is there any habitat for such species.
- The site is adjacent to the Fort Trumbull Riverwalk, a 1.7-acre linear park owned by the City of New London. This walkway provides public access along the waterfront of the Fort Trumbull area, and connects with Fort Trumbull State Park, a 16-acre destination "magnet" state park with restored

third-system granite fort and museum/visitors center, which has a waterfront walkway along the shoreside perimeter. The USCGC Barque EAGLE usually has been moored at Fort Trumbull State Park during the past five years when she has been in New London.

- The Parcel 1A site has been fully evaluated for cultural resources and archaeological resources, and there are no items of note.
- The site is adjacent to a 6.7 acre site designated for a high-quality hotel and parking, both of which would be valuable assets for the museum.
- Number 1 Chelsea Street, the four story brick office building and parcel abutting and immediately to the south of Parcel 1A, has been leased by the U.S. General Services Administration. The building and site are under construction, and will be the new home of the U.S. Coast Guard Research & Development Center by the end of this year.

Fort Trumbull Parcel 4A (Alternative 3) is currently designated by the NLDC's Fort Trumbull Municipal Development Plan (MDP) for "[State] Park and marina support." The site currently is encumbered with approximately nine buildings that need to be demolished to make way for future redevelopment. The infrastructure for the site has not yet been installed, nor have the street improvements around the parcel been completed. A Phase II environmental assessment has not yet been completed, but the Phase I has indicated no serious issues beyond the presence of widespread urban fill, which is expected to have contaminants exceeding the State of Connecticut Direct Exposure Criteria, and will require soil environmental remediation similar to that already completed on Parcel 1A. The costs for site preparation, infrastructure and environmental remediation for this parcel are estimated at \$3.2 million.

- There are no streams, wetlands, open water features or local aquifers on the site. Approximately 1/4th of the site (the southwestern corner), is within the 100-year floodplain. The site is not a waterfront, but due to its elevation has waterviews that extend to the south
- Soil data has been provided to your consultants. The topography of the site is quite uneven, and contains a significant amount of ledge and exposed bedrock.
- There are no threatened or endangered species on the site, nor is there any habitat for such species.
- The site is across the street from Fort Trumbull State Park
- The Parcel 4A site has been fully evaluated for cultural resources and archaeological resources, and there are no items of note.
- Parcel 4A was identified and studied in an EA conducted by the Coast Guard in 2002.
- Parcel 4B, the Fort Trumbull Marina site to the south of Parcel 4A, is privately owned, and Fort Trumbull State project funds are not expected to be available for its acquisition and/or renovation. The marina currently provides slip space and winter storage for approximately 40 boats, with a maximum access depth at mean low water of about 4 ½ feet.

Fort Trumbull MDP Parcel 1 (Alternative 1) is the 9.4-acre waterfront site designated by the New London Development Corporation (NLDC) as the preferred site for the combined development of the National Coast Guard Museum (2.7 acres non-taxable development) and Fort Trumbull hotel/conference center (a high-end taxable development on 6.7 acres, that has direct access waterfront that is conceived as a marina site for vessels up to several hundred feet in length). The site consists of former U.S. Navy land (NUWC), a former oil terminal and a former Amtrak maintenance-of-way railyard. The site has been remediated, and significant site grading has taken place to prepare the site for future development. All new underground infrastructure is in place, and access is provided by a new tree-lined boulevard extension of Nameaug Street. All road improvements leading to the site have been completed for the anticipated full build-out of the Fort Trumbull area, and have been designed to accommodate future traffic requirements this site would generate, including the National Coast Guard Museum and the hotel/conference center development.

- The Parcel 1B portion of the site is under Development Agreement to Corcoran Jennison Company for hotel/conference center development. This Development Agreement remains in effect until 2011.
- The approved Fort Trumbull Municipal Development Plan (MDP) provides for a taxable hotel development on the site, and does not suggest that the entire parcel could be available for non-taxable development.
- There are no streams, wetlands, open water features or local aquifers on the site. While a small portion of the site adjacent to the City of New London's Fort Trumbull Riverwalk (including the waterfront wharf and pier access area) is within the 100-year floodplain, the buildable portion of the site is above the 100-year floodplain. The site has direct waterfront, as well as unobstructed waterviews across the Riverwalk areas adjoining the site, between the site and the waters edge. Riparian access for mooring vessels drawing up to 20' is available at the proposed marina site off the waterfront wharf area.
- Soil data is available, and similar to the conditions of Parcel 1A.
- There are no threatened or endangered species on the site, nor is there any habitat for such species.
- The site is adjacent to the Fort Trumbull Riverwalk, a 1.7-acre linear park owned by the City of New London. This walkway provides public access along the waterfront of the Fort Trumbull area, and connects with Fort Trumbull State Park, a 16-acre destination "magnet" state park with a restored third-system granite fort and museum/visitors center, which has a waterfront walkway along the shoreside perimeter. The USCGC Barque EAGLE has usually been moored at Fort Trumbull State Park during the past five years when she has been in New London.
- The Parcel 1 site has been fully evaluated for cultural resources and archaeological resources, and there are no items of note.
- Number 1 Chelsea Street, the four story brick office building and parcel abutting and immediately to the south of Parcel 1A, has been leased by the U.S. General Services Administration. The building and site are under construction, and will be the new home of the U.S. Coast Guard Research & Development Center by the end of this year.

Riverside Park (Alternative 4) is City of New London owned open-space park property, and not in the purview of NLDC. I would like to note that infrastructure improvements, including street and traffic improvements, would be required to bring any development to this area. A major development of the park may be an issue regarding municipal/state open space regulations, and might preclude any potential contiguous future expansion for the Coast Guard Academy property to the north. I would also note that waterfront access is severely impacted by the presence of railroad tracks along the waters' edge.

Please let me know if I can provide any additional information. For further clarification to this letter, please contact me (860) 447-8011 X21, or via e-mail at jbrooks@nlcd.org.

Sincerely,

A handwritten signature in cursive script that reads "John Brooks".

John Brooks
Waterfront Development Manager

Copy: Michael Joplin, NLDC



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 13, 2008

RDML Mary E. Landry
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593

RE: Interagency and Intergovernmental Coordination for Environmental Planning for the Environmental Assessment for the Proposed Future Acquisition and Operation of the Privately Constructed New National Coast Guard Museum in New London, CT

Dear Ms. Landry,

Thank you, again, for the opportunity to assist the USCG in identifying potential coastal resource and development constraints and issues associated with the construction of a new National Coast Guard Museum in New London.

The current proposal includes two additional project alternative sites over the prior proposal of roughly a year ago. Both of the new alternative sites, Parcel 1 and Parcel 4A, lie within the Municipal Development Plan (MDP) area in the Fort Trumbull peninsula in New London Connecticut. Parcel 1 has been remediated and improved with utility infrastructure. Parcel 4a is scheduled for similar clean-up and site improvements to prepare it for redevelopment. Additionally, the parcels are located adjacent to or near parcels previously proposed for this project, for which we have already provided comments. Therefore, from a coastal resource impact perspective, the feedback we offered in our January 10, 2007 correspondence (see attached) remains unchanged.

Parcel 1 (Proposed Alternative 1) includes a fishing wharf, which currently hosts New London Seafood, a commercial fishing operation. While the operator is currently seeking the necessary permits to relocate his business to a new location, reuse of Parcel 1 must be consistent with the MDP requirement that the overall water-dependency of the MDP area be maintained. Therefore, the loss of the fishing operation, in addition to the loss of the approved water-dependent uses proposed as part of the previous development of a hotel/conference center on the site, would need to be replaced. We look forward to coordinating with all agencies and organizations involved to ensure that the overall water-dependency of the MDP area is maintained.

Finally, the Fort Trumbull MDP outlined specific uses for each development parcel. A change in the use of a development parcel may require the MDP to be modified through a public process.

The Coast Guard should contact the New London Development Corporation and the Connecticut Department of Economic and Community Development to discuss the processes required to change the MDP for the various alternatives proposed within the MDP area.

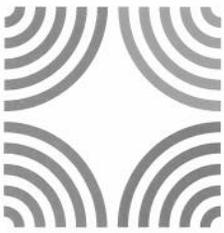
If you have any questions or need additional information, please contact John Gaucher of my staff at (860) 424-3660.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Thompson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brian P. Thompson
Director
Office of Long Island Sound Programs

cc: John Brooks, NLDC
Peter Simmons, DECD
Bruce Hyde, Office of Development & Planning, City of New London
Pamela Adams, DEP State Parks Division
Betsey Wingfield, Bureau Chief, DEP WPLR



Connecticut Commission on Culture & Tourism

Historic Preservation
and Museum Division

One Constitution Plaza
Second Floor
Hartford, Connecticut
06103

860.256.2800
860.256.2763 (f)

February 20, 2008

RDML Mary E. Landry
Director of Governmental and Public Affairs (CG-092)
USCG Headquarters HSC A-3
2100 2nd Street SW
Washington, DC 20593

Subject: National Coast Guard Museum
New London, CT

Dear Ms. Landry:

The State Historic Preservation Office has reviewed supplemental information provided by the United States Coast Guard regarding the National Coast Guard Museum Association's proposed construction of a new National Museum. In particular, this office has examined Alternative 3 (Parcel 4A Alternative). Field inspection indicates that no historic, architectural or archaeological resources are located within Parcel 4A. However, this proposed alternative is situated in immediate proximity to Fort Trumbull, which is listed on the National Register of Historic Places. As such, the United States Coast Guard would need to provide our professional staff with an opportunity to review design plans for the proposed new construction in order to determine whether, or not, the National Museum might represent a visual impact upon historic Fort Trumbull vis-à-vis the National Historic Preservation Act.

The State Historic Preservation Office reaffirms its previous assessment, dated December 20, 2006, regarding the original project locations (Alternative 1, Alternative 2 and Alternative 4).

This office appreciates the opportunity to have reviewed and commented upon Alternative 3. We look forward to additional coordination with the United States Coast Guard concerning the expeditious furtherance of the proposed National Museum.

For further assistance, please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
State Historic Preservation Officer

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APPENDIX E

Air Quality Applicability Analysis



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APPENDIX E

Air Quality Applicability Analysis¹

This air quality applicability analysis was performed to identify potential increases or decreases in criteria air pollutant emissions associated with the acceptance of land for the proposed private construction of a new United States Coast Guard (USCG) National Museum at Parcel 1: Fort Trumbull area (Alternative 1), Parcel 1A: Fort Trumbull Area (Alternative 2), Parcel 4A: Fort Trumbull Area (Alternative 3) or Riverside Park (Alternative 4) in New London, Connecticut. Since the Proposed Action would occur within a United States Environmental Protection Agency (USEPA) designated ozone non-attainment area, it is subject to the federal conformity requirements. The purpose of the analysis is to further determine the applicability of the Federal General Conformity Rule established by 40 Code of Federal Regulations (CFR), Part 51, Subpart W, "Requirements for Preparation, Adoption, and Submittal of Implementation Plans," to the action.

The federal conformity rules were established to ensure that Federal activities do not hamper local efforts to control air pollution. In particular, Section 176(c)(1) of the Clean Air Act (CAA) prohibits Federal agencies, departments or instrumentalities from engaging in, supporting, licensing, or approving any action, in an area that is in non-attainment of the National Ambient Air Quality Standards (NAAQS), which does not conform to an approved State of Federal implementation plan. Therefore, the agency must determine whether or not the proposed action would interfere with the CAA goals in the State Implementation Plan (SIP).

E.1 Project Description

The USCG proposes to accept land for the private construction of a 60,000 square foot museum, with infrastructure, storm water structures, utility lines, and roadway improvements at Parcel 1: Fort Trumbull area (Alternative 1), Parcel 1A: Fort Trumbull Area (Alternative 2), Parcel 4A: Fort Trumbull Area (Alternative 3) or Riverside Park (Alternative 4) within the City of New London, Connecticut.

E.2 Air Quality Regulatory Requirements

The USEPA is the overall regulatory agency for air quality throughout the United States (U.S.). The primary regulatory authority for air quality in Connecticut is the Connecticut Department of Environmental Protection (CTDEP), Bureau of Air Management. Applicable regulations are set forth in the Regulations of Connecticut State Agencies (RCSA), Title 22a, Section 22a-174-1 to 22a-174-200, Abatement of Air Pollution. CTDEP regulates industrial and commercial sources of air pollution that are required to comply with appropriate Federal, state, and local rules governing air emissions.

The USEPA defines ambient air in 40 CFR, Part 50, "National Primary and Secondary Ambient Air Quality Standards," as "that portion of the atmosphere, external to buildings, to which the general public has access." In compliance with the CAA of 1970 and the 1977 and 1990 Clean

¹ The majority of the information presented in this Appendix was obtained from Appendix C of the Final Environmental Assessment for the Land Acquisition for the National Coast Guard Museum, prepared in March 2002 (USCG 2002). However, all regulations, guidelines, and policies have been reviewed to verify accuracy. In particular instances, the information presented in the 2002 EA was inaccurate, therefore the correct information has been included.



Air Act Amendments (CAAA), the USEPA has promulgated ambient air quality standards and regulations. The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety.

NAAQS are provided for six principal pollutants, called criteria pollutants (as identified in Section 108 of the CAA), including the following:

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen Oxides (NO_x)
- Ozone (O₃)
- Particulate matter (PM), divided into two size classes:
 - Aerodynamic size less than or equal to 10 micrometers (PM₁₀)
 - Aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5}).
- Sulfur dioxide (SO₂).

There are two types of quality standards: primary and secondary. Primary standards are designed to protect sensitive segments of the population from adverse health effects, with an adequate margin of safety, which may result from exposure to criteria pollutants. Secondary standards are designed to protect human health and welfare and, therefore, in some cases, are more stringent than the primary standards. Human welfare is considered to include both natural and manmade environments.

Each state and locality has the primary responsibility for air pollution prevention and control. The ambient air standards are presented in **Table E-1**. Under the CAA and CAAA, state and local air pollution control agencies have the authority to adopt and enforce ambient air quality standards more stringent than the NAAQS. The CAA requires that each state submit an SIP, which describes how the state would attain and maintain NAAQS in non-attainment areas. The State of Connecticut has developed a USEPA-approved SIP.

To evaluate the emissions resulting from a project, Federal actions located in non-attainment areas are required to demonstrate compliance with the general conformity guidelines established in 40 CFR, Part 51, the Conformity Rule. The Proposed Action and alternatives are located within New London County, Connecticut. Currently, New London County does not meet the NAAQS for ozone and is classified as a moderate non-attainment area (ozone 8-hour average concentration is 0.095 ppm). Therefore, a General Conformity Rule applicability analysis is warranted. New London County is in attainment for all other criteria pollutants (CO, NO_x, PM₁₀, PM_{2.5}, SO₂, and Pb) (USEPA 2005a).

40 CFR 51.853(b) of the Conformity Rule sets the applicability requirements for projects subject to the Conformity Rule through the establishment of *de minimis* levels for annual criteria pollutant emissions. These *de minimis* levels are set according to criteria pollutant non-attainment area designations. Projects below the *de minimis* are not subject to the Conformity Rule, while those at or above the levels are required to perform a conformity analysis as established in the Rule. The *de minimis* levels apply to direct and indirect sources of emissions that can occur during the construction and operational phases of the action.



**TABLE E-1:
Ambient Air Quality Standards for Criteria Pollutants**

Pollutant	Federal Standard ⁽¹⁾		Connecticut Standard ⁽²⁾	
	Primary	Secondary	Primary	Secondary
Carbon Monoxide (CO) ⁽³⁾				
<i>Maximum 8-Hour Concentration</i>	9 ppm ⁽⁵⁾	9 ppm ⁽⁵⁾	9 ppm	9 ppm
<i>Maximum 1-Hour Concentration</i>	35 ppm ⁽⁵⁾	35 ppm ⁽⁵⁾	35 ppm	35 ppm
Lead (Pb) ⁽³⁾				
<i>Maximum Arithmetic Mean Over Three Consecutive Months</i>	1.5 ug/m ³	1.5 ug/m ³	1.5 ug/m ³	1.5 ug/m ³
Nitrogen Dioxide (NO₂) ⁽³⁾				
<i>Annual Arithmetic Mean</i>	0.05 ppm	0.05 ppm	0.05 ppm	0.05 ppm
Ozone (O₃) ⁽³⁾				
<i>Daily Maximum 8-Hour Average</i>	0.08 ppm	0.08 ppm	No Separate State Standard	No Separate State Standard
<i>Maximum 1-Hour Average ⁽⁴⁾</i>	0.12 ppm	0.12 ppm		
Inhalable Particulate Matter (PM₁₀) ⁽³⁾				
<i>Annual Arithmetic Mean</i>	50 ug/m ³	50 ug/m ³	75 ug/m ³	60 ug/m ³
<i>Maximum 24-Hour Concentration</i>	150 ug/m ³	150 ug/m ³	260 ug/m ³ ⁽⁵⁾	150 ug/m ³ ⁽⁵⁾
Inhalable Particulate Matter (PM_{2.5}) ⁽³⁾				
<i>Annual Arithmetic Mean</i>	15 ug/m ³	15 ug/m ³	No Separate State Standard	No Separate State Standard
<i>Maximum 24-Hour Concentration</i>	65 ug/m ³	65 ug/m ³		
Sulfur Dioxide (SO₂)				
<i>Annual Arithmetic Mean</i>	0.03 ppm ⁽⁵⁾	n/a	80 ug/m ³	60 ug/m ³
<i>Maximum 24-Hour Concentration</i>	0.14 ppm ⁽⁵⁾	n/a	365 ug/m ³ ⁽⁵⁾	260 ug/m ³ ⁽⁵⁾
<i>Maximum 3-Hour Concentration</i>	n/a	0.5 ppm ⁽⁵⁾	1300 ug/m ³	1300 ug/m ³

Notes:

1. Federal ambient air quality standards obtained from 40 CFR 50.
2. State ambient air quality standards obtained from Section 19-508-24 of the Regulations of Connecticut State Agencies.
3. Federal primary and secondary standards for this pollutant are identical.
4. Per 40 CFR 50.9(b), on 15 June 2005 the 1-hour ozone standard was revoked for all areas except the 8-hour ozone non-attainment Early Action Compact (EAC) Areas; therefore, the 1-hour ozone standard was revoked for the State of Connecticut.
5. Not to be exceeded more than once per year.
ppm = parts per million.
ug/m³ = micrograms per cubic meter of air.
N/A = not applicable; no particular standard for this pollutant.

Direct emissions are those caused by, or initiated by the Federal action which occur at the same time and place as the action. Indirect emissions are those caused by the action but occur later in time and/or at a distance removed from the action itself, yet are reasonably foreseeable and over which the Federal agency responsible for the action can maintain control as part of the actions program responsibility. To determine the applicability of the Conformity Rule to this



Proposed Action, emissions were estimated for the ozone precursor pollutants, NO_x and volatile organic compounds (VOCs).

Annual emissions for these compounds were estimated for each of the project actions or alternatives to determine if they would be below or above *de minimis* levels established in the Rule. The *de minimis* threshold established in 40 CFR 51.853(b) is 50 tons per year (tpy) VOCs and 100 tpy NO_x.

E.3 Existing Conditions

New London is located in an area currently designated as moderate non-attainment for O₃ and attainment for the other pollutants. The CAA requires that states adopt SIPs that target the elimination or reduction of the severity and number of violations of the NAAQS. SIPs set forth how emissions that contribute to the formation of O₃ must be reduced in order to achieve and maintain NAAQS attainment. The CTDEP has revised the SIP to address O₃ attainment issues.

The most important O₃ precursors (chemicals that produce O₃ in the presence of sunlight) are VOCs and NO_x. In accordance with guidance set forth by the USEPA in the "Final Rule to Implement 8-Hour Ozone National Ambient Air Quality Standard," Connecticut is required to be in attainment of the 8-hour ozone NAAQS by June 2010.

The Implementation Rule requires a state to apply all reasonable available control measures (RACM) that will assist the state in timely attainment of the ozone standard. RACM are those readily implemented measures that are economically and technologically feasible and that contribute to the advancement of attainment. Determining RACM requires an area-specific analysis. The State is required to consider RACM for any source of VOCs or NO_x that occur in the state. The plan to implement these RACM is due 15 June 2007, together with demonstration of attainment.

E.4 Conformity Applicability Analysis

There are foreseeable construction-related and operational emissions associated with the proposed new National Museum.

The General Conformity analysis, for the construction related aspects of the project, must be performed for the proposed facilities and infrastructure developments, utility installation, and roadway construction or improvement within the proposed sites. The analyses for the operational aspects of the project include emissions anticipated from vehicle traffic generated by visitors and employees of the proposed new National Museum. The major pollutants that need to be analyzed are VOCs and NO_x. The USEPA set rules for non-attainment areas to ensure that project induced emissions will not exceed the general conformity *de minimis* levels. This conformity analysis and air emissions evaluation will follow the criteria regulated in 40 CFR, Parts 6, 51, and 93. The general conformity analysis and emission evaluation began with assembling project data including construction and equipment parameters; utilization of construction equipment; total hours of various equipment used; construction period and schedules; estimated trips and emissions from traffic.

Air emissions associated with construction of the Museum building, utility and infrastructure (water and sewer mainline installation, gas electrical telecommunication), and the roadway improvements, would be generated by various construction equipment and heavy-duty vehicles.



This heavy equipment would be operated on a schedule of eight hours per day, over the course of a 260-day work year.

The applicability analysis estimated potential emissions for the proposed project alternatives for the worst-case construction phases; it is assumed that the No Action Alternative would have no impact to air quality other than that which currently exists and was not included in the analysis. Since the City is designated moderate non-attainment for ozone, annual emissions were estimated for the ozone precursor pollutants VOCs and NO_x. The following subsections describe the assumptions and methodology used to estimate potential emissions during construction phases.

The proposed project includes a 60,000 square foot museum, 25,000 square ft of ancillary site improvements, and a parking lot of approximately 1 acre. As previously stated, New London is located in the southeastern portion of the State, and does not meet the NAAQS for ozone and is classified as a moderate non-attainment area; New London is in attainment for all other criteria pollutants (USEPA 2005a). Per 40 CFR 51.853(b)(1), a general conformity determination is required of projects with emissions for either VOCs or NO_x that exceed 50 tons per year. Conformity determination for CO, PM₁₀, PM_{2.5}, SO₂, and Pb are not necessary, as the area is neither a non-attainment area nor a maintenance area for these pollutants.

E.5 Project Emissions

Potential project emissions include indirect emissions expected from vehicle traffic generated by visitors and employees of the proposed new National Museum, as well as direct emissions from the construction and operation of the facility.

The most significant emissions are expected from the generated vehicle traffic. The estimated trips and emissions from this traffic are shown in **Table E-2** and represent a forecast for the design year of the project. Emission estimates for employee-related traffic and visitor-related traffic were calculated using the following equation:

$$\text{Emissions(tons/year)} = \text{Estimated trips/year} \times \text{Average Trip Distance (miles/trip)} \times \text{Emission Factor (grams/mile)} \times (1 \text{ ton}/907,184.7\text{g})$$

**TABLE E-2:
Indirect Project Emission Estimate**

	Estimated Trips Per Year	Trip Distance (miles)	Emissions	
			NO _x (tons/year)	VOC (tons/year)
Employees	18,200	15	0.3	0.1
Visitors	100,000	100	11.0	3.7



The employee trip estimate is based on an assumption of 35 employees commuting 15 miles one-way, twice per day, for 260 days each calendar year. The visitor trip estimate is based on an expected annual visitation of 200,000 persons in an average group size of two.² The vehicle emission factors used are equal to 1.0 gram (g) NO_x per mile and 0.41g VOC per mile.³ These values represent the VOC and NO_x emission standards for passenger cars dictated in the 1970 CAA and the 1977 and 1990 CAAA, respectively.

Direct project emissions include both an initial short-term component from construction activities and a continuing component from facility operations and maintenance activities. The construction activities will generate some NO_x and VOC emissions from the combustion engines of the heavy machinery as well as fugitive dust emissions from vehicle traffic and land-clearing activities. The quantity of NO_x and VOC emissions are relatively insignificant, compared to either the indirect project emissions or the fugitive dust emissions from the construction activities.⁴ It is improbable emissions from a single construction project would exceed the 50 tpy VOCs and 100 tpy NO_x threshold established in 40 CFR 51.853(b). Impacts from the construction activity emissions would be minimized through the application of the recommended mitigation/management practices, including but not limited to wet dust suppression, wind speed reduction, and vehicle inspection and maintenance. An additional recommendation would be to utilize a reformulated gasoline for construction equipment when possible.

A continual source of direct emissions, versus short-term construction sources, is the maintenance activities and operation of heating, ventilation, and air conditioning (HVAC) equipment at the new National Museum. Emissions from the maintenance activities are not expected to be significant in comparison to the indirect emissions generated by the project. The direct emissions from HVAC equipment depend on the type of system selected (e.g., ground source heat pump vs. external combustion boiler or space heaters) and the actual heat load requirements of the proposed building(s). For example, if heat load calculations indicated a requirement of 2 tons or 24,000 British Thermal Units (BTUs) per 1,000 square ft of floor area, a natural gas space heating unit rated at approximately 120 tons or 1.5 million BTUs per hour would be required to provide space heat for the proposed 60,000 square-foot building. According to the EPA's AP-42 emission factors, emissions of NO_x and VOCs for natural gas boilers or heaters of this size are 100 and 5.5 pounds per million cubic ft of natural gas combusted, respectively. Therefore, emissions of NO_x and VOCs from such a heating unit, if operated at 50 percent capacity during the 8-month heating season, or 4,320 million BTUs, or approximately 4.32 million cubic ft of natural gas (with a heating value of 1,000 BTU per cubic foot), would be 432 and 24 pounds per year, respectively.

At this phase of project planning, it is not anticipated that emissions from HVAC units or any other equipment at the facility would require state or Federal stationary source permitting actions. If the final project design indicates that stationary source permits may be required, the USCG will work with the appropriate state and Federal agencies to facilitate full compliance with any applicable regulations. For example, if the final design included a boiler, applicable

² Trip estimates provided in Appendix C of the Final Environmental Assessment for the Land Acquisition for the National Coast Guard Museum, prepared in March 2002 (USCG 2002).

³ Emission factors based on Tier 0 emission standards, USEPA, Offices of Transportation and Air Quality, EPA420-B-00-001, February 2000. VOC emission factor shown is actually emission standard for total hydrocarbons, including methane, which is not considered a VOC.

⁴ Information derived from Appendix C of the Final Environmental Assessment for the Land Acquisition for the National Coast Guard Museum, prepared in March 2002 (USCG 2002). Statement derived from the conversation between Mr. Joe Fouts (CTDEP) and Mr. Stephen Simonsen (Third Rock Consultants) on 6 November 2001.



regulations could include 40 CFR 60 “Standards of Performance for New Stationary Sources,” or 40 CFR 63, “National Emission Standards for Hazardous Air Pollutants for Source Categories”, and state construction and operating permits may be required for the unit. However, based on previous experience with facilities of similar size, it is not anticipated that the HVAC system of the museum would require any permitting actions.

E.6 Conclusion

The proposed project is not expected to have a detrimental impact to the air quality of New London or the Greater Connecticut region. The annual emissions for the project during its operating lifetime are estimated to be approximately 11.5 tpy of NO_x and 3.8 tpy of VOCs (refer to **Table E-2**). The emission rates for both pollutants fall below the *de minimis* threshold (50 tpy VOCs and 100 tpy NO_x) established in 40 CFR 51.853(b), and the Proposed Action is not considered “regionally significant” under 40 CFR 51.853(i). Therefore, a conformity determination of the project to state or Federal implementation plans is not required.

The project is expected to have minimal impact on the microscale air quality in the area surrounding the proposed new National Museum. The projected vehicle estimates listed above equal an increased traffic volume of less than 500 vehicles per day, and should have a minimal impact upon the level-of-service of existing roads near the proposed project. This additional traffic is not expected to lead to any short-term exceedances of the NAAQS in the areas surrounding the proposed project.



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APPENDIX F
Memorandum of Agreement



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**MEMORANDUM OF AGREEMENT
BETWEEN THE UNITED STATES COAST GUARD AND THE NATIONAL
COAST GUARD MUSEUM ASSOCIATION
REGARDING THE NATIONAL COAST GUARD MUSEUM PROJECT**



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MEMORANDUM OF AGREEMENT
BETWEEN
THE UNITED STATES COAST GUARD
AND
THE NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.
REGARDING THE NATIONAL COAST GUARD MUSEUM PROJECT

1. **PARTIES.** The parties to this Agreement are the United States Coast Guard (Coast Guard) and the National Coast Guard Museum Association, Inc. (Association).
2. **AUTHORITY.** The United States of America, acting by and through the Coast Guard, under the authority of Title 10 U.S. Code § 2601, as delegated to the Commandant in Title 33 C.F.R. Part 17, may accept, hold, and administer any gift of real or personal property made on the condition that it be used for the benefit, or in connection with the establishment, operation, or maintenance of a museum under the jurisdiction of the Coast Guard. The Association, a § 501(c)(3), IRS Code Corporation incorporated under the laws of Connecticut, was created to function as a charitable association for the purpose of developing, designing, and constructing the facilities and inventory of a National Coast Guard Museum.
3. **PURPOSE.** The purpose of this Agreement is to set forth the procedures that must be followed in order for the Coast Guard to accept as a gift any real or personal property in connection with the proposed National Coast Guard Museum.
4. **GENERAL.**
 - a. The Coast Guard seeks to obtain and operate a new national museum to properly record and display its rich history and artifacts. As a preliminary step, the Coast Guard needed to identify an acceptable site for the museum. Chief among the criteria used to evaluate site alternatives were proximity to the Academy and Leadership Development Center (since the museum will be a prime venue for continued professional development), cost of land acquisition and associated costs, intermodal access from multiple transportation sources, land for a 40,000 square foot facility with room for outside exhibits and sufficient parking, and a location that would provide waterfront access and support a planned 200,000 visitors per year. After a site selection committee evaluated several possible sites that would meet the Coast Guard's needs, two sites were ultimately deemed suitable for the museum – Fort Trumbull Parcel 4A and Riverside Park, both in New London, Connecticut. The Coast Guard then conducted an environmental assessment to consider the environmental impacts of its proposed action. On March 25, 2002, Mr. Robert Horowitz, United States Coast Guard Director of Finance and Procurement, issued a Finding of No Significant Impact

(FONSI), indicating that there was no significant environmental impact associated with either of the alternatives.

- b. The environmental assessment, which formed the basis of the FONSI, determined that Parcel 4A, which consists of the land bordered by Smith, Trumbull, East and Walbach Streets in the Fort Trumbull area of New London, Connecticut was the preferred location for the new National Coast Guard museum. The Coast Guard and the Association agree that Parcel 4A is the preferred location and, if offered, the parties will cooperate in developing the museum on that site. A portion of this parcel is presently owned by the New London Development Corporation (NLDC), a non-profit, private organization that seeks public-private partnerships to act as an engine for economic development in New London. The remaining portions of the parcel are privately owned.
- c. Riverside Park is located on 18.64 acres on the northeast side of New London, on the west bank of the Thames River immediately south of and adjacent to the Coast Guard Academy. The City has entered into a long-term lease with the Children's Museum of Southeastern Connecticut to locate its museum in the park. While Riverside Park remains an alternative location for the Coast Guard museum, the proposed site plan of the Children's Museum complicates the positioning of the Museum on this site, and contributes to the identification of Parcel 4A as the preferred alternative.
- d. The Association has offered to acquire land, raise funds for the construction of a museum upon the acquired land, and donate the museum, the underlying and surrounding land, and any other associated improvements, to the United States of America, for the purpose of a National Coast Guard Museum. The donated property shall then be placed under the administrative control of the United States Coast Guard. Once the gift has been made, the Association desires to provide continuing support to the Coast Guard for its operation and maintenance of this museum, which will be operated as a facility of the United States Federal Government
- e. The Association makes no guarantee that it will be able to acquire land, raise said funds or provide such continuing support.

5. GIFT ACCEPTANCE PROCESS

- a. The Association shall document in a written offer to the Coast Guard its plan to give to the Coast Guard a gift of a Coast Guard Museum, to include the underlying and surrounding land and any other associated improvements. This offer shall 1) identify the land upon which the museum will be built, 2) describe in as much detail as is available the type of facility that the Association intends to build, or its process for planning and designing the facility; 3) identify any conditions that the Association intends to place on the gift; and 4) describe the anticipated timeline for the project.
- b. The Coast Guard is unable to accept a gift until it is actually offered. However, the Coast Guard will examine the Association's planned offer of a future gift and will process that offer in accordance with the concepts outlined in the Coast Guard's gift acceptance

regulations, found in the Financial Resources Management Manual, COMDTINST M7100.3 (series) and Acceptance and Accounting for Special Projects and Other Gifts to the Coast Guard from Non-Federal Sources, COMDTINST 5760.14 (Gift Instruction). The Director of Finance and Procurement shall be the gift acceptance authority (GAA) for this gift. If the conditions of the Financial Resources Management Manual and the Gift Instruction are met, the Coast Guard will indicate in writing, within sixty (60) days of the Association's offer described above in paragraph 5.a, its conditional approval of the future gift. This conditional approval will set out any conditions of acceptance. The following conditions, at a minimum, are anticipated:

- 1) The Coast Guard and Department of Transportation must approve the proposed location prior to any acquisition of land by the Association.
 - 2) The Coast Guard must approve the design of the proposed museum and any related facilities, prior to issuance of any construction contracts by the Association.
 - 3) The Coast Guard must approve the interior exhibit design.
 - 4) Building design must be approved by Connecticut State Historical Preservation Officer (SHPO) and the Office of Long Island Sound Programs, Connecticut Department of Environmental Protection.
 - 5) The land, in fee simple, and the improvements thereto must be offered to the United States of America, acting by and through the Coast Guard, free of any rights of reverter or reentry, liens or other encumbrances (except those that are expressly approved by the Coast Guard, such as utility easements).
 - 6) The land must be found environmentally clean following a due diligence audit.
- c. Upon completion of the construction, the Association shall notify the Coast Guard that it is ready to formally offer the gift to the Coast Guard. The Coast Guard, prior to accepting the gift, must satisfy various real property acquisition requirements, including, but not necessarily limited to, the following:
- 1) Secretarial Approval. Given both the public and congressional interest in this transaction, the Coast Guard must obtain the approval of the Secretary of Transportation, per applicable Department of Transportation orders.
 - 2) Legal Description. An adequate legal description (survey and plat plan) of the subject property must be prepared.
 - 3) Title Evidence. Title evidence (title insurance) regarding the subject property, compliant with the applicable United States Department of Justice (DOJ) regulations, must be obtained.

- 4) Appraisal. The subject property must be appraised, by regulation, unless the Association waives this requirement in writing (49 CFR § 24.102(c)(2)).
 - 5) Opinion of Title And Deed. The Coast Guard's legal staff will prepare a preliminary opinion of title (per applicable DOJ regulations), the general warranty deed and any other required legal instruments, and record the deed and any other instruments in the appropriate deed registry.
- d. The GAA, in accordance with Coast Guard gift acceptance procedures, may accept the gift on behalf of the United States of America, acting by and through the Coast Guard, once all conditions and real property acquisition requirements have been met. If the gift is rejected, or if it is not accepted within a reasonable time, then upon sixty (60) days' advanced written notice, all rights in and title to the museum, the underlying and surrounding land and any other associated improvements shall vest solely in the Association, and this Memorandum of Agreement shall become null and void.

6. ADDITIONAL PROCEDURES CONCERNING LAND ACQUISITION

- a. Prior to accepting or purchasing land, the Association shall consult with the current owners of the land to determine the extent of existing environmental data for the site. A plan to complete any remaining environmental analysis will be pursued by the Association following review of all existing data, in order to ensure that the land does not contain any environmental contamination or hazards that would preclude later acceptance of such land by the Coast Guard.
- b. The Association, prior to accepting or purchasing land, will ensure that the site is conveyed with a free and clear title (or if encumbered, that such encumbrances will be acceptable to the Coast Guard, or will be extinguished, satisfied, or otherwise discharged at or before conveyance of title to the United States). The Association will endeavor to accept land only after all site preparation is completed, including the demolition and clearing away of any existing structures, the installation of all necessary utilities to the lot lines, and the environmental testing and clean-up of the land.

7. ADDITIONAL PROCEDURES CONCERNING MUSEUM DESIGN & CONSTRUCTION

The Association will engage and contract with architects, designers, engineers, construction managers, consultants, and any other necessary resources to complete the museum. The Coast Guard shall exercise due diligence when considering accepting a National Coast Guard Museum, and as part of this process the Coast Guard must ensure that all functional, life safety, economic viability, sustainability, Federal, State and local requirements are satisfied before accepting the museum. The Coast Guard will be given sufficient opportunity to review and make recommendations as to all project plans and specifications before the start of any construction and to identify any such recommendations which could adversely affect the decision to accept the donation. The Coast Guard will also have the opportunity to review any potential architectural and engineering consultants ("A&E") considered by the Association and provide input into the process

of their selection. As the project progresses the Association will keep the Coast Guard informed and will solicit any comments or input as various phases of the work commence and are completed.

8. FUNDRAISING CONSIDERATIONS

a. Incorporated herein as Annex A.

9. **TIMELINESS.** Except as otherwise specified in this Agreement, all tasks and obligations required to be performed by either the Coast Guard or the Association pursuant to this Agreement must be performed reasonably promptly. All requests by the Association for approval of any aspect of the museum campaign, development, or construction shall be assigned a Coast Guard representative to facilitate processing and ensure a timely approval or explanation for disapproval.

10. POINTS OF CONTACT.

For the Coast Guard:

Commandant (G-I)
United States Coast Guard
2100 2nd Street S.W.
Washington, D.C. 20593-0001
(202) 267-2158
(202) 493-7692 [fax]
hwright@comdt.uscg.mil

For the Association:

Richard J. Grahn, Esq.
Looney & Grossman LLP
101 Arch Street, 9th Floor
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(617) 951-2800
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rgrahn@lgllp.com

11. **OTHER PROVISIONS.** Nothing in this Agreement is intended to conflict with current law or regulation or the directives of the United States Coast Guard or Department of Transportation. If a term of this Agreement is inconsistent with such authority, then that term shall be invalid, but the remaining terms and conditions of this Agreement shall remain in full force and effect.

12. **EFFECTIVE DATE.** The terms of this Agreement and Annex A will become effective on the date of final signature.

13. **MODIFICATION.** This Agreement and/or its Annexes may be modified upon the mutual written consent of the parties. New Annexes may be added with the consent of both parties

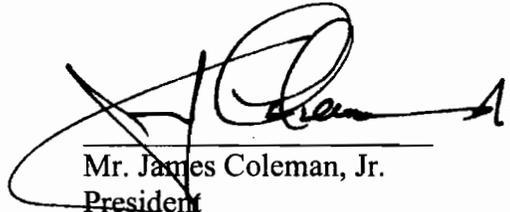
to discuss areas not covered by the original Agreement, as modified.

14. **TERMINATION.** The terms of this Agreement and its Annexes, as modified with the consent of both parties, will remain in effect until terminated. Either party upon thirty (30) days written notice to the other party may terminate this Agreement, or any Annex attached hereto. If this Agreement is terminated prior to the time that the museum is donated by the Association to the United States of America, then all rights in and title to the museum, the underlying and surrounding land, and any other associated improvements shall vest solely in the Association upon the termination of this Agreement, and this Memorandum of Agreement shall become null and void.

APPROVED BY:



VADM Timothy W. Josiah
Chief of Staff
United States Coast Guard
2100 2nd Street S.W.
Washington, D.C. 20593



Mr. James Coleman, Jr.
President
National Coast Guard Museum Association, Inc.
75 Crystal Avenue
New London, CT 06320

Date: May 22, 2002

Date: May 8, 2002

ANNEX A
TO THE MEMORANDUM OF AGREEMENT BETWEEN
THE UNITED STATES COAST GUARD AND
THE NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.

FUNDRAISING CONSIDERATIONS

1. **PURPOSE.** The purpose of this Annex is to describe the restrictions applicable to Coast Guard personnel in connection with the National Coast Guard Museum Association, Inc.'s (Association) fundraising effort, and to establish procedures governing the relationship between the Coast Guard and the Association with regards to this effort.
2. **GOVERNING AUTHORITIES.**
 - a. The Standards of Ethical Conduct, 5 CFR Part 2635, regulate fundraising and interaction with private entities by Coast Guard personnel.
3. **FUNDRAISING CAMPAIGN.**
 - a. The Association shall keep the Coast Guard apprised as to the status and nature of its fundraising campaign, so that Coast Guard officials are adequately able to respond to questions should they arise.
 - b. The Association, in conducting its fundraising campaign, shall not take any action that obligates the Coast Guard or any Coast Guard official to either current or future actions or to financial obligations without the written concurrence of the Coast Guard, or that official, as appropriate.
4. **LIMITATIONS APPLICABLE TO COAST GUARD OFFICIALS.**
 - a. **No Authority to Fundraise in an Official Capacity.** Under 5 CFR § 2635.808, a Coast Guard official may participate in fundraising in an official capacity only when authorized to do so by statute, Executive order, or regulation. There is no authority for Coast Guard officials to fundraise on behalf of the Association. Therefore, all Coast Guard officials must avoid taking any action that would constitute fundraising in an official capacity.
 - 1) **Fundraising** means the raising of funds for a nonprofit organization, through solicitation of funds or sale of items; or participation in the conduct of an event by an employee where any portion of the cost of attendance or participation may be taken as a charitable tax deduction by the person incurring that cost. 5 CFR § 2635.808(a)(1).
 - 2) **Participation in the conduct of an event** means active and visible participation in the promotion, production, or presentation of the event and includes serving as honorary chairperson, sitting at a head table during the event, and standing in a reception line. 5 CFR § 2635.808(a)(2). Generally, any public speaking at a fundraising event is deemed to be a fundraising activity.

b. **Permissible Activities, Generally.** Because of the restriction noted above, Coast Guard personnel may not actively solicit gifts or donations for the Coast Guard Museum or the Association. However, it is permissible for Coast Guard personnel to engage in the following activities in connection with the Association's Fundraising Campaign, since the results of the campaign will ultimately flow as a gift to the Coast Guard:

- 1) State the needs of the Coast Guard for a National Coast Guard Museum. The National Coast Guard Museum shall be included on any "needs list" maintained by the Coast Guard, and the Association shall be permitted to refer to any such "needs list" in connection with the Association's fundraising efforts.
- 2) Discuss vision, mission, future initiatives, and strategic plans of the Coast Guard for the proposed National Coast Guard Museum.
- 3) Discuss the importance of private funding to the National Coast Guard Museum project.
- 4) Acknowledge the existence and progress of an on-going museum campaign.

c. **Participation in Dinners, Receptions, and Other Social Events.** Subject to the restrictions discussed in paragraphs d and e below, Coast Guard officials may attend and participate in the conduct of dinners, receptions, and other social events hosted by the Association. While attending such dinners, receptions, or other social events, Coast Guard officials may engage in the following activities with other attendees, including potential donors:

- 1) State the needs of the Coast Guard for a National Coast Guard Museum.
- 2) Discuss vision, mission, future initiatives, and strategic plans of the Coast Guard for the proposed National Coast Guard Museum.
- 3) Discuss the importance of private funding to the National Coast Guard Museum project.
- 4) Acknowledge the existence and progress of an on-going museum campaign.

d. If an attendance fee is charged for the dinner, reception, or other social event hosted by the Association, and free attendance is offered to a Coast Guard official, that official may accept free attendance at the event if:

- 1) The attendance fee is less than \$20,
- 2) The event is a "widely attended gathering" as determined by a designated ethics official (and there is CG interest in the official attending this function),
- 3) The Coast Guard official will be a speaker or presenter at the event, or

- 3) The Coast Guard official will be a speaker or presenter at the event, or
 - 4) The Coast Guard official will receive a bona fide award for meritorious public service or achievement from the Association at the event.
- e. As indicated above in paragraph 4.a.(1), special limitations apply to certain fundraising events for which the person incurring the cost may take a portion of the cost of attendance or participation as a charitable deduction. Coast Guard officials may not actively participate in the conduct of these types of fundraising events in any of the following ways:
- 1) Actively or visibly promoting or producing the event.
 - 2) Sitting at the head table.
 - 3) Serving as the master of ceremonies.
 - 4) Serving as the honorary chairperson.
 - 5) Standing in the reception line.
 - 6) Allowing their attendance or appearance at the event to be used to promote the event.
 - 7) Actively soliciting donations.

However, despite these special limitations, Coast Guard officials may participate in a fundraising event in the following way, even if the event is one for which a portion of the cost of attendance or participation may be taken as a charitable deduction by the person incurring the cost:

- 1) Attending the event.
- 2) Delivering an "official speech" (the topic and audience must be appropriate and consistent with the speaker's official duties and the speaker may not ask for a donation. For example, it would be appropriate for Commandant (G-I) to talk to a gathering of potential donors about his vision and strategic goals for the Museum, so long as he does not ask for a donation during his remarks).
- 3) Accepting special seating and participating in other ways appropriate to the delivery of an official speech. (For example, a Coast Guard official who will be making an official speech at a fundraiser may sit at the head table if other speakers will be similarly seated, or that seating is appropriate for an official speaker).

5. NAMING OPPORTUNITIES.

- a. Because the National Coast Guard Museum will be a federal installation, the Association can not sell naming opportunities for the building, wings, or rooms. Naming federal buildings and facilities is a federal function that cannot be delegated to private organizations or donors. Coast Guard policy limits the way Coast Guard buildings and facilities may be named. For these reasons, the Coast Guard cannot, in advance of a gift offer, guarantee any individual a naming opportunity for any pre-designated level of donation.
- b. If a donor to the Association attaches a condition to their gift requiring that a specific building, wing, or room (constructed with or benefiting from their gift) be named after a specific individual, the Association will seek an opinion from the Coast Guard GAA as to whether this is an acceptable condition. If the naming condition is consistent with Coast Guard core values, the Museum's mission, and Commandant policy, the gift may be accepted by the Association, and upon receipt of the museum from the Association, the Coast Guard will name the building, wing, or room in accordance with the donor's desires. However, gifts cannot be accepted if they contain a condition that the building, wing, or room be named for a commercial company or corporation.
- c. It is appropriate for the Coast Guard to acknowledge a donor for their support in connection with the construction of the National Coast Guard Museum. This can typically be done in ways other than naming the building, wing, or room after the donor. For example, a tasteful plaque, sign, or other permanent marker may be installed on or within the building to publicly acknowledge individual donors or groups of donors. Such plaques, signs, and markers may acknowledge commercial and corporate gifts, but the use of company trademarks and logos is never appropriate, and will not be permitted. In connection with the Association's fundraising efforts, the Association shall be permitted to include and/or refer to information regarding eligibility for permissible donor acknowledgements. For example, the Association's materials may state that a donor will be entitled to a tasteful plaque upon making a donation at a specified monetary threshold. The Association shall not be required to obtain Coast Guard approval prior to accepting a donation for which there will be an acknowledgement of the nature permitted by this paragraph.

6. COAST GUARD NAME AND LOGO.

The Association shall be permitted to use the Coast Guard's name and logo in connection with the Association's fundraising efforts. The Association shall obtain the Coast Guard's approval of all written fundraising materials, such approval not to be unreasonably withheld. The Coast Guard will exercise due diligence in approving or disapproving such material in a reasonable time in accordance with paragraph (9) of this agreement.



**MEMORANDUM OF AGREEMENT
BETWEEN THE UNITED STATES COAST GUARD, NATIONAL COAST
GUARD MUSEUM ASSOCIATION, NEW LONDON DEVELOPMENT
CORPORATION, CORCORAN JENNISON COMPANY, AND THE STATE
OF CONNECTICUT
REGARDING THE NATIONAL COAST GUARD MUSEUM**



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Memorandum of Agreement

This Memorandum of Agreement ("MOA") is made and entered into as of the twenty eighth day of April 2006, by and among the National Coast Guard Museum Association, Inc., the New London Development Corporation, the Corcoran Jennison Company, Inc., the United States Coast Guard, and the State of Connecticut ("Parties"). This Agreement is entered into as an expression of the mutual intent and shared goals of the parties and contemplates the future negotiation and execution of binding documentation by and between the parties to effect said goals.

WHEREAS, the Parties are interested and committed to the coordinated development of a world class National Coast Guard Museum and supporting facilities ("Museum") to educate Americans about our nation's rich maritime heritage and the Coast Guard's unique 215 years of providing homeland security and life saving, not only on our shores, but around the world, both in times of peace and war; and

WHEREAS, the National Coast Guard Museum Association, Inc. ("NCGMA") was formed to fund and construct the Museum, on behalf of the United States Coast Guard, one of the nation's five armed services, and the only one without a national museum; and

WHEREAS, the New London Development Corporation ("NLDC") is authorized and committed to creating public-private partnerships that act as an engine for economic development in the City of New London; to increase the city's tax base; to promote an increase in the number of jobs available in the city, and to enhance the quality of life for New London's residents; and

WHEREAS toward these purposes, the NLDC has prepared a municipal development plan ("MDP") for the Fort Trumbull area of New London, which MDP encompasses various land parcels including a parcel located adjacent to the Thames River and Nameaug Street Extension known as Parcel 1; and

WHEREAS, on December 22, 2005, Corcoran Jennison Company, Inc. ("CJ") entered into a First Amended and Restated Development Agreement with NLDC (the "2005 Agreement"), which Agreement was acknowledged and consented to by the State and which Agreement provides for the development by CJ of a quality hotel and conference facility on Parcel 1 (the "Hotel") and housing development and office/research facilities on other parcels in the MDP area; and

WHEREAS, the 2005 Agreement provides that CJ and NLDC will cooperate with the NCGMA in the coordinated design, permitting, construction and operation of the Museum and the Hotel on Parcel 1 in the event that NLDC and the NCGMA enter into a development agreement for the Museum with specific terms and timetables for the completion of the Museum; and

WHEREAS, CJ and NLDC have completed certain initial activities in furtherance of the proposed Museum including identifying the southern portion of Parcel 1 as the appropriate

location for the Museum in coordination with the NCGMA, obtaining all required land use approvals for the lawful division of Parcel 1 into a northerly parcel (the "Hotel Parcel") and a southerly parcel (the "Museum Parcel"), designing a shared parking arrangement for the Museum and the Hotel, and submitting draft agreements to the NCGMA for review; and

WHEREAS, the USCG cannot reach a final decision concerning where to locate the new National Coast Guard Museum prior to the conclusion of required site analysis, but it has determined that the Museum Parcel appears to meet many of the criteria under consideration; and

WHEREAS, in light of the aforesaid consideration, the USCG views the Museum Parcel as a preferred site for construction of the National Coast Guard Museum; and

WHEREAS, the State of Connecticut ("State") is desirous of encouraging and contributing to the establishment on the Museum Parcel of a world-class National Coast Guard Museum and teaching facility to entertain and educate the citizens of Connecticut and visitors from around the world.

NOW THEREFORE, in consideration of the mutual promises contained herein, the Parties agree as follows:

1. The parties shall work cooperatively toward the timely and coordinated development of the Hotel Parcel and the Museum Parcel on the Fort Trumbull site for the Hotel and the Museum, respectively;
2. NCGMA will begin a \$30 million capital fundraising campaign for the design and construction of the Museum;
3. NLDC agrees to assist NCGMA with the development, design review and approval of Museum plans and specifications for the Museum Parcel site at Fort Trumbull and to assist with the coordination of the joint development, design and approval of the infrastructure engineering required to support development by NCGMA and CJ of their respective projects;
4. The State will pursue a funding commitment in the amount of \$15 million for the development and construction of the Museum on the Museum Parcel;
5. The State and NCGMA agree as between themselves to work cooperatively with the Connecticut Congressional delegation to seek commitment to the amount of \$13 million in federal funding for the design and construction of the Museum, additional to Coast Guard appropriations for other purposes;
6. CJ will design, develop and construct the Hotel in accordance with its obligations under the Development Agreement;

7. The Coast Guard environmental specialists will consult with NLDC personnel to review its existing environmental data for the Fort Trumbull site, which process shall be commenced on or before July 30, 2006, and thereafter, shall be diligently pursued to timely completion.

8. The Parties will seek a location and provide for the mooring of the US Barque EAGLE in close proximity to the proposed Museum and in coordination with the waterfront features of the Hotel;

9. The Parties will coordinate the design, development and construction of the Hotel and Museum projects supporting the maritime and artistic qualities of the National Coast Guard Museum and the Museum's community-based outdoor amphitheater and related public facilities and integrated community activities and outreach;

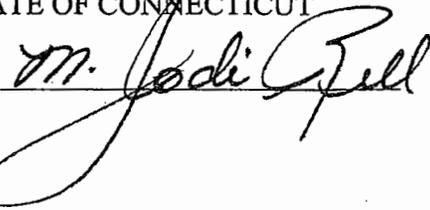
10. The Parties will utilize their best efforts to pursue expeditiously their respective responsibilities in this agreement;

11. Upon the execution of this agreement, the parties shall timely commence and diligently pursue the final negotiation and drafting of the documentation necessary to effect the goals stated herein, including but not limited to: (i) a Development Agreement by and between NLDC and NCGMA for the development of the Museum on the Museum Parcel; and (ii) a Cooperation Agreement by and between CJ and NCGMA for the coordination of the permitting, construction and future operation of the Hotel and Museum projects, as provided for in the 2005 Agreement. The Coast Guard and NCGMA acknowledge the benefit of producing concept plans and architectural designs for the Museum at the earliest possible date permitted by Coast Guard site review procedures so that the same may be considered in the Parcel 1 site infrastructure and planning processes.

12. The Coast Guard may investigate with the cooperation of the Parties efforts to locate other Coast Guard activities at Fort Trumbull.

13. Nothing in this Agreement is intended to conflict with or alter the 2005 Agreement, conflict with requirements of current law, or conflict with any regulations or directives of the United States Coast Guard, the Department of Homeland Security, the New London Development Corporation, the City of New London, the State of Connecticut or the United States of America.

STATE OF CONNECTICUT

By: 

Date: 4/28/06

UNITED STATES COAST GUARD

By: [Signature]

Date: 4/27/06

NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.

By: [Signature]

Date: 4/28/06

NEW LONDON DEVELOPMENT CORPORATION

By: [Signature]

Date: 4.28.06

CORCORAN JENNISON COMPANY, INC.

By: [Signature]

Date: 4/28/06



APPENDIX G

Newspaper Public Notice Affidavits for Public Circulation of the EA



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2020 Notice of Availability Draft Environmental Assessment Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut The United States Coast Guard (USCG) announces the availability of the Draft Environmental Assessment (EA) for the Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut. This Draft EA provides a comparative analysis of three possible alternatives for the Proposed Action. A detailed description of the Proposed Action and considered alternatives is provided in the Draft EA. Alternatives considered, but eliminated from further detailed study, are also described in this document. The scope of this Draft EA includes addressing the full breadth of potential environmental, cultural and socioeconomic impacts to New London, Connecticut. The Draft EA was released publicly May 4th, 2007, and is available for public review online at www.uscg.mil/news/museum_ea.pdf. Copies of the Draft EA and important reference documents are also available for public review at the New London Public Library. The Draft EA will have a 30-day public comment period commencing May 10th, 2007, and ending June 8th, 2007. Requests for copies of the Draft EA, or written questions and written comments regarding the Draft EA, should be directed to: Commandant (CG-092), Headquarters, U.S. Coast Guard, 2100 Second Street SW, Washington, DC 20593, Attn: CDR Winston Leslie, Telephone: (202) 372-4600.

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2020 Notice of Availability Draft Environmental Assessment Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut The United States Coast Guard (USCG) announces the availability of the Draft Environmental Assessment (EA) for the Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut. This Draft EA provides a comparative analysis of three possible alternatives for the Proposed Action. A detailed description of the Proposed Action and considered alternatives is provided in the Draft EA. Alternatives considered, but eliminated from further detailed study, are also described in this document. The scope of this Draft EA includes addressing the full breadth of potential environmental, cultural and socioeconomic impacts to New London, Connecticut. The Draft EA was released publicly May 4th, 2007, and is available for public review online at www.uscg.mil/news/museum_ea.pdf. Copies of the Draft EA and important reference documents are also available for public review at the New London Public Library. The Draft EA will have a 30-day public comment period commencing May 10th, 2007, and ending June 8th, 2007. Requests for copies of the Draft EA, or written questions and written comments regarding the Draft EA, should be directed to: Commandant (CG-092), Headquarters, U.S. Coast Guard, 2100 Second Street SW, Washington, DC 20593, Attn: CDR Winston Leslie, Telephone: (202) 372-4600.

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4021 Notice of Extension of Public Comment Period Draft Environmental Assessment Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut The United States Coast Guard (USCG) announces the extension of the Public Comment Period for the Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum in New London, Connecticut. A detailed description of the Proposed Action and considered alternatives is provided in the Draft EA. The scope of this Draft EA includes addressing the full breadth of potential environmental, cultural and socioeconomic impacts to New London, Connecticut. The comment period has been extended due to an editing error in the previous notice. The Draft EA was released publicly May 4th, 2007, and is available for public review online at www.uscg.mil/news/museum%20ea.pdf. Copies of the Draft EA and important reference documents are also available for public review at the New London Public Library. The public comment period has been extended for 30 days and will now end on July 8th, 2007. Requests for copies of the Draft EA, or written questions and written comments regarding the Draft EA, should be directed to: Commandant (CG-092), Headquarters, U.S. Coast Guard, 2100 Second Street SW, Washington, DC 20593, Attn: CDR Winston Leslie, Telephone: (202) 372-4600.

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APPENDIX H

Public Comments and Responses on the Draft EA



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**PUBLIC COMMENTS AND RESPONSES
MAY 2007 DRAFT EA**



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Comment #	Date	Comment		Action Taken by USCG to Address the Comment
1	12 Jan 2007	I and my staff stand ready to support your development efforts as they are advanced, and we look forward to the day when we can meet at the formal groundbreaking for this magnificent building.	Gov. M. Jodi Rell	Comment noted.
2	May 2007	The 2006 MOA raises the question of whether the USCG agreed to site the Museum immediately adjacent to the hotel (both to be constructed on parcel 1) as an inducement for Corcoran Jennison to finally execute its promise to develop the property, it having dragged its feet for several years.	Welling	Comment noted. The MOA states that the USCG cannot "reach a final decision where to locate the new National Coast Guard Museum prior to the conclusion of required site analysis". Additionally, this Environmental Assessment (EA) has been revised to analyze two additional site alternatives, including Parcel 1 (entire) and Parcel 4A in the Fort Trumbull area. If the Parcel 1 (entire) alternative is selected through the NEPA-compliant analysis, then it is reasonably foreseeable that the proposed hotel and conference center will be located elsewhere within the Fort Trumbull area. The relocation of the hotel and conference center, within the Fort Trumbull area, would require a minor modification to the Fort Trumbull Municipal Development Plan (MDP). Thus, the idea of the USCG encouraging Corcoran Jennison into developing the property is misinforming.
3	May 2007	I don't understand why the USCG is requiring the construction of a \$7+ million dollar pier adjacent to the museum, when Eagle now moors at the splendid Fort Trumbull Pier.	Welling	Currently, it is not reasonably foreseeable that the US Barque <i>Eagle</i> will relocate from its current mooring location at Fort Trumbull Pier. The MOA #8 states that the "Parties will seek a location and provide for the mooring of the US Barque EAGLE in close proximity to the proposed Museum". It is the opinion of the USCG that mooring the US Barque EAGLE at its current location at the Fort Trumbull State Pier fulfils the MOA.
4	May 2007	The DEA does not provide any supporting analysis as to why 4A was eliminated.	Welling	In response to the numerous comments received regarding the inclusion of Parcel 4A within the EA, the EA has been revised to include two additional site locations as possible alternatives (Parcel 4A and Parcel 1). Refer to Section 1.1.2 and Section 3.0 for further details.
5	9 May 2007	Parcel 1A is within the floodplain	Welling	A small portion, in the southwest area of Parcel 1A is located within the floodplain, as indicated in Figure 4-6a. Through the conceptual design and the museum footprint, this impact can be mitigated. Section 5.6.6 has been revised to more clearly emphasize the measures recommended, in an effort to mitigate any impacts to the portion of the alternative project location that is within the 100-year floodplain.
6	9 May 2007	Because of the eminent domain history, parcel 4A will not be available for commercial or private development. Won't the citizens then have lost potential tax revenues from parcel 4A and parcel 1A because of the museum?	Welling	According to the NLDC, if the proposed USCG Museum is not developed on Parcel 4A, the parcel will provide park and marina support, as prescribed in the Fort Trumbull MDP. Further, tax revenue for the Fort Trumbull area, as a whole, will increase approximately double the previous and current amount collected, as indicated in the Fort Trumbull MDP. Additionally, Section 1.1.2 has been updated to include additional information on the eminent domain history of the Fort Trumbull area in an attempt at fully assessing the alternative site locations to assist the USCG in the decision-making process.
7	10 May 2007	Ft. Trumbull is the perfect location. My concern is the artist renderings of the proposed building.	Andriopoulos	Comment noted. The building design shall be approved by the CTDEP SHPO to ensure that it does not impact the cultural and historical surroundings.
8	10 May 2007	Requested copy of AMEC contract with the USCG	Fromer	Requestor shall submit a formal request directly to the USCG regarding AMEC's contract.
9	10 May 2007	Requested copy of the EIS for the National Coast Guard Museum.	Fromer	An Environmental Impact Statement (EIS) for the National Coast Guard Museum has not been conducted. The 2002 Final Environmental Assessment for the Land Acquisition for the National Coast Guard Museum was made available to the public in March 2002. Both the 2002 Final EA and the 2006 draft EA for Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum and corresponding Findings of No Significant Impacts (FONSI's) are in full accordance with the National Environmental Policy Act (NEPA). The finding of this EA will determine whether an EIS is required. If the EA indicates that no significant impact is likely, then the USCG shall release a FONSI and continue with the proposed action. However, if the EA determines that the proposed action will significantly affect the quality of the human environment, then an EIS shall be prepared.
10	16 May 2007	Parcel 1A is within the floodplain	Wardwell	Refer to response to comment #5.
11	16 May 2007	Parcel 4A is better location, although not in the DEA.	Wardwell	Refer to response to comment #4.
12	16 May 2007	Parcel 4A is superior and was eliminated without explanation.	Kokos	Refer to response to comment #4.
13	16 May 2007	Agrees with Welling's comments on Parcel 4A being a better location.	Olson	Refer to response to comment #4.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
14	16 May 2007	Parcel 1A is within the floodplain.	Ross	Refer to response to comment #5.
15	16 May 2007	Parcel 4A is a better location for the museum.	Ross	Refer to response to comment #4.
16	16 May 2007	Parcel 4A is a better location.	Sipes	Refer to response to comment #4.
17	16 May 2007	Parcel 1A is within the floodplain	Vorbach	Refer to response to comment #5.
18	16 May 2007	Parcel 4A is a better location.	Vorbach	Refer to response to comment #4.
19	17 May 2007	Opposed to 1A location for museum.	Bascom	Comment noted. The EA has been revised to include analysis of additional site locations that meet the criteria identified in Section 3.0.
20	18 May 2007	Parcel 4A is best available site.	Smith	Refer to response to comment #4.
21	18 May 2007	The best interests of the USCG is to dismiss this site entirely and seek another; Groton, for example.	Sutherland	Section 3.6 discusses the alternatives that were considered but eliminated from further analysis, as they do not meet one or more of the primary site selection criteria presented in Section 3.0. One of the requirements used during the selection process was cost, specifying that the property and building must be donated to the USCG. A location in Groton, CT has not been offered to the USCG as a donated property and building.
22	19 May 2007	Parcel 4A is better location.	Grabb	Refer to response to comment #4.
23	19 May 2007	Parcel 4A is better location.	Swedberg	Refer to response to comment #4.
24	20 May 2007	Why is Parcel 4A not being considered? It is a better location with a view of open water.	Otranto	Refer to response to comment #4.
25	21 May 2007	Agree with Wellings comments on Parcel 4A being the best location	Becker	Refer to response to comment #4.
26	21 May 2007	Prior to construction, consultation with the CTDEP State Park Division should take place.	CT Commission on culture & Tourism	Section 5.8.6 has been revised to indicate the need for consultation with the CTDEP State Park Division in an effort to minimize any potential visual impacts on the historical and cultural aesthetics of Fort Trumbull State Park.
27	21 May 2007	Riverside Park possesses moderate to high archaeological sensitivity and a professional reconnaissance survey is warranted.	CT Commission on culture & Tourism	Section 5.8.6 has been modified to more clearly state the mitigation measures that must be taken in the event that the museum is located within Riverside Park.
28	21 May 2007	The NLDC must go through proper government authorities for the approval of the revision of MDP (since Parcel 1A was not included in MDP).	Demetrios	It is not anticipated that a hearing or government approval is required for the modification of the MDP, since the intensity of use is not anticipated to change within the Fort Trumbull area, as prescribed in the Fort Trumbull MDP. A minor modification to the Fort Trumbull MDP may be necessary.
29	21 May 2007	With 1/4 million visitors, it shall create a major traffic problem.	Demetrios	The traffic infrastructure was assessed in the 2001 Traffic Study of the Fort Trumbull area, which took into account the proposed new museum and the number of visitors anticipated to visit per year. Additionally, since the study was approved, several infrastructure improvements have been made to the Fort Trumbull area that will handle the increased volume, as prescribed in the Fort Trumbull MDP. Section 5.11.6 recommends the performance of a traffic impact study to determine the level of impacts for the Riverside Park Alternative.
30	21 May 2007	New London needs more tax producing properties, not more tax exempt properties.	Demetrios	Sections 4.9 and 5.9 have been revised to include impacts to tax revenues at each alternative site location. Parcel 1 (entire) and parcel 1A were previously tax exempt properties, due to ownership of the property by the US Navy. In addition, the 2000 MDP indicated that the expected property tax revenue for the Fort Trumbull area will at least double once the revitalization has been completed, which also accounted for a proposed museum.
31	21 May 2007	Parcel 4A better location	Gutierrez	Refer to response to comment #4.
32	21 May 2007	Parcel 4A is the best site.	Schofield	Refer to response to comment #4.
33	21 May 2007	Parcel 1A is within the floodplain.	Schofield	Refer to response to comment #5.
34	28 May 2007	Locating the museum in Parcel 1 rather than 4A is a mistake	Fleishell	Refer to response to comment #4.
35	29 May 2007	Parcel 4A is best location	Nelson	Refer to response to comment #4.
36	29 May 2007	Parcel 1A is within the floodplain	Welling	Refer to response to comment #5.
37	29 May 2007	The DEA does not provide any supporting analysis as to why 4A was eliminated.	Welling	Refer to response to comment #4.
38	31 May 2007	Parcel 4A is best alternative.	Welling	Refer to response to comment #4.
39	31 May 2007	Parcel 1A is within the floodplain.	Welling	Refer to response to comment #5.
40	31 May 2007	Proposed hotel will include a restaurant, eliminating the possibility of a museum restaurant with a spectacular view	Welling	The design of the proposed museum has not yet been finalized; however, a dining facility is still within the scope of the proposed museum.
41	31 May 2007	Parcel 1A is too close to Amtrak	Welling	Comment noted.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
42	31 May 2007	Parcel 1A looks toward Groton Industrial waterfront	Welling	Comment noted.
43	3 June 2007	Zero mention of plans to dredge the channel and build a new pier to accommodate the proposed relocation of the Barque Eagle.	Schwartz	Refer to response to comment #3. Currently, it is not reasonably foreseeable that the US Barque Eagle will relocate from its current mooring location at Fort Trumbull State Pier, in association with the proposed new National Museum.
44	3 June 2007	Environmental justice - this subject is glossed over, especially information on tax revenue. The property will yield zero tax revenues to New London if it is transferred to Federal ownership.	Schwartz	Refer to response to comments #6 and #30. Socioeconomic impacts have been revised to include information on tax revenue impacts due to the implementation of the proposed action. Refer to Section 4.9 for further details.
45	3 June 2007	The URL is invalid, therefore the public comment period must be extended to allow the advertisement of the correct location where the public can view the EA.	Schwartz	Due to the URL error in the public notice, the public comment period was extended an 30 days, through 6 July 2007.
46	4 June 2007	We concur with the analysis supporting a FONSI	NLDC	Comment noted.
47	4 June 2007	Minor error was noted on page 5-17, Paragraph 5.12.1. Replace 4 inches with 4 feet	NLDC	Section 5.12.1 has been revised to describe the correct amount of clean fill placed on Parcel 1A (and Parcel 1).
48	5 June 2007	New London voters had no voice in any decision regarding the museum.	Frink, New London City Councilor	Comment noted. The purpose of the public comment period from 10 May 2007 through 6 July 2007 was for the residents of New London to voice their opinions on the draft EA for the proposed new National Coast Guard Museum in New London, CT, in accordance with NEPA. Additionally, in June 2001, the USCG held two public information gathering meeting in association with the proposed new National Museum.
49	5 June 2007	The museum constitutes a substantial change in the MDP, violating Chapter 32, section 8-191(3) and 8-200 of the Connecticut General Statutes.	Frink, New London City Councilor	Under Chapter 32, Section 8-200 of the Connecticut General Statutes, the public hearing and approval process must be done when the modification substantially changes the MDP. Resolution 161427-02 of the Fort Trumbull MDP includes a museum. Further, no significant change to the Fort Trumbull MDP is anticipated, as the land use intensity is not anticipated to increase. However, a minor modification to the Fort Trumbull MDP may be necessary, upon completion of the EA.
50	5 June 2007	The museum will be tax-exempt, adding another major structure to the 55% of New London's grand list that yields no tax revenue.	Frink, New London City Councilor	See response to comment #6 and #30
51	5 June 2007	The USCG moved the site from Parcel 4A to Parcel 1A. This move displays at least a minimal regard for the value of history.	Frink, New London City Councilor	Refer to response to comment #4.
52	5 June 2007	I offer Appendices A to K as further probative evidence of the collusion between high ranking USCG officers and the NLDC.	Fromer	Comment noted. Four action alternatives and one no action alternative are currently being analyzed in this EA. Section 3.0 provides descriptions of these alternatives, as well as the alternatives considered but eliminated from further study. Previous correspondences included in comment letter (#29) does not express any predetermination on proposed alternative site locations. The alternative site locations have been selected through a fully legal process, in accordance with NEPA.
53	5 June 2007	The USCG needed the environmental assessment to justify the selection contrary to the purpose and intent of NEPA	Fromer	Selection of the alternative site locations is fully discussed in Section 3.0 using criteria set forth in 14 USC §98, which includes the close proximity to the USCG Academy in New London, CT. The USCG has decided to revise the EA to include additional alternatives to more fully assess all the potential sites for the new museum and to assist the USCG in the decision making process.
54	5 June 2007	I request a copy of contract between the USCG and AMEC	Fromer	Refer to comment #8.
55	5 June 2007	Several references are not readily available to the public. US citizens would require significant time to access the reference information or obtain it under the FOIA. Additionally, there are several references that should have been discussed within the document.	Fromer	Comment noted. The USCG has conducted the public participation and EA process in full accordance with NEPA
56	5 June 2007	Neither the USCG nor AMEC personnel involved in preparation of the EA have any demonstrated expertise, education, training or knowledge of global fossil fuel reserves, embodied energy, life cycle energy analysis, evaluation and management and associated greenhouse gas production, i.e., carbon dioxide, water vapor, etc.	Fromer	The USCG and AMEC personnel involved in the preparation of the EA have written the analysis in full accordance with NEPA. An Air Quality Applicability Analysis was completed by a professional engineer who is knowledgeable in Federal, state and local environmental programs, including the Clean Air Act. Refer to Appendix E.
57	5 June 2007	The EA omitted analyses and discussions on water dependency and stormwater quality and treatment.	Fromer	Sections 4.6 and 5.6 of the draft EA have been revised to more accurately discuss the water dependency and stormwater quality impacts of the proposed action.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
58	5 June 2007	The USCG did not base the two proposed and 10 rejected sites on a national solicitation of sites satisfying the primary site-evaluation criteria. Hence, the USCG has predetermined the preferred sites and tailored the selection criteria to the desired result affords the only possible inference.	Fromer	The original list of site locations, presented in Table 3-1, were compared to the criteria listed in 14 USC §98 and reduced to the alternatives discussed throughout the EA based on the criteria. Additionally, the draft EA has been revised to include additional alternative site locations that meet the criteria.
59	5 June 2007	The USCG should consider all feasible alternatives such as the internet, expanding Forestville, MD location, the New London Railroad Station, a cooperative venture with Lyman Allyn museum, Building 2 of the former NUWC property, the former Norwich State Hospital, the Academy, and Waterford, CT.	Fromer	All feasible alternatives that met the criteria set forth in 14 USC §98 are included in the draft EA. Additionally, the EA has been revised to include additional alternative site locations that meet the criteria presented in Section 3.0. Section 3.6 has been revised to include additional alternatives that do not meet the selection criteria, presented in 14 USC §98
60	5 June 2007	Draft EA does not provide proof detailing each artifact and demonstrative need for preservation, show that displace and interpretation are essential impacts required by NEPA, consider long term effects of stormwater pollution, nor examine the full panoply of BMPs.	Fromer	According to Dr. Browning, USCG Historian, several USCG artifacts are currently improperly stored due to unfavorable storage conditions. The commenter shall contact the USCG Historian directly, regarding detailed information related to USCG artifacts. Stormwater impacts resulting from the proposed action and the best management practices recommended in an effort to mitigate such impacts has been revised within the draft EA.
61	5 June 2007	The EA failed to consider the CCMA. Consequently, there is not a scintilla of probative evidence to prove the need for access to the water.	Fromer	Refer to response to comment #57.
62	5 June 2007	Nothing in the 14 USC §98 establishes the primary criteria used in the decision of alternative locations. The EA also ranked all factors of equal rank and importance without a logical basis.	Fromer	14 USC §98 supports the criteria provided in Section 3.0, which includes property specifications, funding factors and educational linkage. The EA has been written in accordance with NEPA by providing the information necessary for the USCG to select the best location that meets both the criteria set forth in 14 USC §98 and results in the least amount of adverse impacts to human health and the environment. Two additional site locations, Parcels 1 and 4A, have been included in the EA, for analysis.
63	5 June 2007	The CG can more effectively and efficiently achieve the educational goal by the Virtual museum.	Fromer	A virtual museum was considered, but eliminated from further study, as indicated in Section 3.6. A virtual museum can offer exhibiting possibilities which a physical museum could not create, and therefore was examined as a possible alternative; however, the virtual museum alternative was eliminated from further study as it does not meet one or more of the primary site selection criteria. A virtual museum, also, does not convey "scale, texture, a sense of place, and other three-dimensional properties"... "Be it small or large, seeing the real thing is unambiguous. There is often an emotional reaction that accompanies perception of true size" (Cody 1997). A virtual museum would, undoubtedly, entirely disregard this perspective. Additionally, a virtual museum would not rightly honor the men and women who currently serve, nor those who have served, in the United States Coast Guard.
64	5 June 2007	The EA contains no long-term financial analysis to justify the conclusion found in the Executive Summary, which suggests that the museum should pose minimal financial and operational risk to the USCG and the US.	Fromer	As indicated in Section 2.0, the proposed New National Museum shall be gifted to the USCG by the National Coast Guard Museum Association (NCGMA). Therefore, the USCG will only be responsible for the operation and maintenance of the museum (as discussed in Section 2.0). The operation and maintenance of the new National Museum would not pose as a financial burden as the museum would require a nominal entrance fee which will assist in the operation and maintenance of the building and exhibits.
65	5 June 2007	The EA has not identified and established the locations of the eliminated alternatives nor provided the detailed basis for their elimination.	Fromer	The alternative locations originally examined by the USCG, but subsequently eliminated, are clearly discussed in Section 3.6 as is required by NEPA.
66	5 June 2007	The Executive Summary fails to consider future electrical utility impacts, life cycle energy consumption, greenhouse gas production, specific and cumulative stormwater quality impacts and water dependency. This comment applies equally to the two other alternatives.	Fromer	The Executive Summary provides a brief summary of the impacts that would be anticipated as a result of the implementation of any of the five alternatives discussed in greater detail within the EA. Further, an air quality applicability analysis has been prepared by a registered professional engineer, and included in Appendix E. In addition, the EA shall be reviewed by the Connecticut Department of Environmental Protection (CTDEP).
67	5 June 2007	The term "foreseeable" to describe a merger of Parcel 1A and Parcel 1B is a fraudulent statement. The CG has a legal obligation as a part of its planning function under the NEPA to prepare an EA and possibly and EIS for Parcel 1 and not just Parcel 1A.	Fromer	The term "foreseeable" is used as a result of the merger of Parcels 1A and 1B being anticipated but not a definite action. The EA has been revised to include all reasonable alternative site locations, refer to response to comment #4.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
68	5 June 2007	Table ES-1 fails to identify the level of significance for each factor in selecting the preferred site; surely, all factors do not contribute the same environmental significance.	Fromer	As Table ES-1 is in the Executive Summary, the table provides a simple comparison of the environmental impacts that would result from the implementation of the proposed action at any of the five alternative site locations. This table is a simplistic tool that helps in assessing and establishing the alternative with the least amount of impacts to human health and the environment. A more descriptive analysis of the anticipated impacts is provided in Section 5.0 of the EA.
69	5 June 2007	The EA fails to consider the impacts and environmental consequences of a transfer from the Forestville site to New London; including environmental impacts to Prince Georges County. This EA requires the expansion to include Forestville.	Fromer	Impacts that are expected to occur as a result of the transfer of artifacts and the personnel from Forestville, MD, involved in Alternatives, 1, 2, 3, and/or 4, have been included in the EA. Section 5.9 has been revised to address impacts to Forestville, MD.
70	5 June 2007	The CG should include the environmental effects of berthing the Eagle at Fort Trumbull.	Fromer	Refer to response to comment #3.
71	5 June 2007	There is no analysis of average distance traveled and energy consumed for the public to travel to the "dozens of museums and locations to see the full range of" artifacts.	Fromer	Section 1.1.2 has been revised in order to more accurately demonstrate the need for an up-to-date facility to preserve and exhibit the history of the USCG, rather than forcing the public to travel to multiple locations.
72	5 June 2007	The EA has inaccurately quoted the statute 14 USC §98.	Fromer	The term "close" proximity has been revised in Section 3.0 to accurately quote 14 USC §98.
73	5 June 2007	The Museum site selection committee members - mostly former USCG Cadets - assist in concluding that the USCG engaged in unfair, prejudicial, and capricious decision-making leading to an intended conclusion.	Fromer	The Museum selection committee members had, as established in the 2002 EA, proposed 28 alternative site locations for the new National Museum. However, through the elimination process, using selection criteria, the 2002 EA narrowed the locations down to three alternatives. After the EA was finalized, the USCG reconsidered the alternatives and is currently considering four action alternatives and one no action alternative, in accordance with NEPA.
74	5 June 2007	The EA ignored impacts from solar radiation, water quality in the Thames River, aquatic resources, solid waste, sewerage.	Fromer	Section 5.0 has been revised to more clearly describe the anticipated impacts due to the implementation of the proposed alternatives, to the maximum extent practicable.
75	5 June 2007	Although Parcel 1A does not have aquatic resources, <i>per se</i> , the activities at the proposed museum would directly and indirectly affect the Thames River's water quality and aquatic resources.	Fromer	Stormwater impacts anticipated from the proposed project have been revised, where appropriate, in order to further discuss the potential effects to the water quality of the Thames River. Mitigation measures are recommended to further reduce the anticipated impacts.
76	5 June 2007	The EA should contain a list of observed species in the vicinity of the entire shoreline at Fort Trumbull from samplings and underwater investigations over a period of one year or from recently reported scientific studies as a substitute.	Fromer	The biological resource sections of the draft EA have been written in accordance with NEPA. As all of the alternative site locations are located in previously disturbed areas, and no species of special concern were identified by the USFWS or CTDEP, the necessary steps have been wholly fulfilled. Further studies and discussion regarding observed species in the vicinity of the alternative site locations is not required and therefore not included in this analysis.
77	5 June 2007	The EA does not address the "Environmental Land Use Restrictions" entered on the land records for Fort Trumbull according to the Connecticut General Statutes, Sec. 22a-133n et seq.	Fromer	Section 4.12.1.5 discusses remedial actions that have been conducted within the Fort Trumbull area, specifically Parcel 1 and 1A, in an effort to bring the area into compliance with the requirements of the CTDEP RSRs, found in the RCSA Sections 22a - 133k-1 to 22a-133k-3. Thus, the "Environmental Land Use Restrictions" have been addressed within the EA.
78	5 June 2007	EA does not take into consideration rising sea level and increased storm intensity from the consequences of projected climate change.	Fromer	According to the 18 October 1997 CEQ Memorandum on global climate change considerations, sea level is projected to increase between 6 and 38 inches by the year 2100. Such an increase in sea level will still be below the elevation of the majority of Parcel 1, 1A, 4A, and the well below the Riverside Park Alternative site. Therefore, floodplain impacts caused by global climate change are not a foreseeable future impact on any of the Alternative locations. The 1997 CEQ Memorandum does not, however, discuss the need for storm intensity to be discussed in regard to projected climate change. Additionally, the new National Museum construction design will consider storm resistant technologies; however, this is not part of the environmental analysis and is therefore not discussed within the EA.
79	6 June 2007	No explanation for not including Parcel 4A in the analysis.	Ecker	Refer to response to comment #4.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
80	6 June 2007	There is a disregard of the flood plain encroachment issues.	Ecker	Refer to response to comment #5.
81	6 June 2007	The evaluation did not consider the proximity of Parcel 1A to Fort Trumbull State Park. The CT DEP believes that this location would benefit the park and the museum, providing for this site.	CTDEP	The beneficial impact of placing the new National Museum within the Fort Trumbull area has been emphasized within Section 5.13.2.
82	6 June 2007	Prior to construction at Parcel 1A, the NLDC and/or developer must submit a Development Remedial Action Plan (RAP) for the Department's review and approval.	CTDEP	Discussion of mitigation measures, including the submittal of a RAP for CTDEP Review has been included within the EA's mitigation/management measures (Section 5.12.4).
83	6 June 2007	There is no acknowledgement that stormwater runoff from the museum facility could impact water quality of the Thames River or that mitigation or management measures will be implemented.	CTDEP	Section 5.6.1 has been revised to provide a more detailed discussion of the stormwater impacts associated with the construction and operation of the new National Museum. Additionally, Section 5.6.6 provides a more detailed description of mitigation measures recommended to further reduce the impacts of stormwater runoff on the Thames River as a result of the Proposed Action.
84	7 June 2007	I share the views of my classmate, retired Adm. William Ecker, regarding the Coast Guard museum.	Keller	Refer to response to comments #79 and #80.
85	7 June 2007	The EA does not mention Parcel 4A	Sawyer	Refer to response to comment #4.
86	7 June 2007	The DEA contains a cursory discussion of vehicular traffic patterns and emission standards.	Sawyer	As discussed in Section 5.3.1, approximately 200,000 visitors are anticipated to visit the new National Museum, per year. Based on the Air Quality Applicability Analysis and the Air Quality Conformity determination, the emissions from museum visitors would be de minimus the CTDEP threshold (see Appendix E).
87	7 June 2007	The DEA does not contemplate or address the possibility of an increase in the overall land use and environmental impact due to the Museum's relocation from Parcel 2 or 4A to parcel 1 with so-called hotel.	Sawyer	Section 5.13.1.1 discusses the potential impacts associated with the proposed projects in the area of Parcel 1A (including the proposed hotel).
88	7 June 2007	Contains a cursory discussion of stormwater impacts on the Thames River.	Sawyer	Refer to response to Comment #83. Section 5.6.1 has been revised to provide a more detailed discussion of the stormwater impacts associated with the construction and operation of the new National Museum. Additionally, Section 5.6.6 provides a more detailed description of mitigation measures that would be employed to minimize the impacts to stormwater.
89	7 June 2007	The DEA contains a cursory examination of endangered species	Sawyer	Section 4.7 has been revised to indicate that during the 2002 EA, the CTDEP indicated that there would not be any likelihood of endangered species, or any species of concern, at Parcel 4A. During communication with the CTDEP through the NEPA process, no species of concern are known to be located in any of the Alternative site locations (as shown in Figure 4-8.)
90	7 June 2007	The DEA produced and noticed by the USCG under the guise of providing important information, essentially deprives the public's right of due process, i.e. notice and hearing.	Sawyer	Refer to response to comment #48.
91	7 June 2007	Paragraph 8 of the 2006 MOA reads: 'The parties will see a location and provide for the mooring of the US Barque Eagle in close proximity to the proposed museum.	Von Winkle	The current foreseeable future of the US Barque Eagle is to remain at it's current mooring at Fort Trumbull State park, which is within close proximity to the alternative site locations. Refer to comment #3.
92	7 June 2007	Loss of property taxes from Parcel 1A and Parcel 4A.	Von Winkle	Parcel 1A was previously owned by the US Navy and therefore not a tax generating property. Refer to comment #30.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
93	20 June 2007	Under EO 12898 of 1994, the Coast Guard must ensure that Environmental Justice was done to all those who formerly resided in our neighborhood. A full investigation needs to be conducted into the health effects upon the elderly, the low-income and/or the minority citizens who formerly inhabited that neighborhood.	Kelo	The effects on human health and the environment, as a result of the proposed new National Museum, are not anticipated to be disproportionately high on minority or low-income populations. The alternative sites are currently owned by the NLDC, the City of New London, or the USCG Academy and do not contain any residents currently residing on the properties. The EA fulfills EO 12898 through the thorough analysis of the project study area in regard to environmental justice, in addition to the public comment period (EO 12898, Section 5-5). Additionally, the EO 12898 of 1994 states that under NEPA, the identification of environmental justice issues "does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory." The identification of a disproportionately high and adverse human health or environmental effect on low-income and/or minority citizens, thus, does not call for an EIS to be conducted.
94	20 June 2007	A thorough EIS is called for.	Kelo	The EA is prepared in accordance with NEPA. Since no significant impacts have been identified as a result of the proposed action at any of the alternative site locations, an EIS is not necessary and a shorter EA meets all necessary requirements. Refer to response to Comment #93.
95	20 June 2007	If the USCG goes through with the proposed museum in the Fort Trumbull neighborhood, we will not go away. We have vowed to demonstrate and leaflet outside of it.	Kelo	Comment noted.
96	21 June 2007	A waterfront site violates the federal Coastal Zone Management Act and the Connecticut Coastal Management Act.	Fromer	Refer to response to comments #57.
97	21 June 2007	The EA failed to demonstrate the architectural and thematic compatibility of the museum with the existing vista.	Fromer	Refer to response to comments #26 and #82. The EA is not intended to include the design of the museum itself, as that will be accomplished once the location has been chosen. All site plans and conceptual designs shall be approved by the appropriate agencies/officials, including but not limited to the CTDEP SHPO.
98	21 June 2007	According to the letter from Admiral T. H. Collins to Governor Jodi Rell, dated February 11, 2006, the fishing pier found adjacent to Parcel 1A would be eliminated and would require some dredging. Elimination of the fishing pier would violate the CCMA goals and policies.	Fromer	Refer to response to comments #3 and #43. Moving the US Barque <i>Eagle</i> is not a foreseeable future action at this time; thus, there will not be any dredging and therefore discussion on this topic is not included within this EA. If the US Barque <i>Eagle</i> is to be moved to a new location where dredging is required than a supplemental EA may be conducted to analyze the impacts of that action.
99	21 June 2007	The EA does not show consistency with the state plan especially for water dependency	Fromer	Refer to response to comment #57.
100	21 June 2007	Mr. David Fox, Environmental Analyst, CTDEP, failed to provide a comprehensive review of the EA followed by substantive and meaningful site-specific comments demonstrating suspected DEP bias. He limited his comments to co-location of the museum to the state park and stormwater water quality.	Fromer	Comment noted. Comment does not specifically refer to this EA. However, the USCG has conducted the EA analysis of the Alternative site locations in full accordance with NEPA.
101	24 June 2007	The EA must consider the tax exemption impacts.	Fromer	Refer to response to comment #6.
102	26 June 2007	I am writing to extend my full support for developing the National Coast Guard Museum at Fort Trumbull Parcel 1A in the City of New London.	Foti	Comment noted.
103	26 June 2007	That land was taken by eminent domain and the people of New London are outraged by what happened there. I urge you not to put your wonderful museum in that location.	Howard	Comment noted. A discussion of the eminent domain proceedings has been included within the EA in order to assist the USCG in the decision making process (Section 4.1.4).
104	26 June 2007	I strongly support the development of the Coast Guard Museum in New London at the Fort Trumbull Municipal Development Project area. The project will be a tremendous asset to our community.	Mariani	Comment noted.

Comment #	Date	Comment		Action Taken by USCG to Address the Comment
105	26 June 2007	I support the relocation of the US Coast Guard Museum to the Fort Trumbull peninsula.	Oney	Comment noted.
106	26 June 2007	Fort Trumbull is an optimum location for the museum. I have no doubt it will benefit the local area, region and state. As a business person in the region I am excited what this will do for the local economy.	Russell	Comment noted.
	26 June 2007	I request that Coast Guard include the e-mail below sent by John Brooks, a former Coast Guard Officer and Academy graduate, of the New London Development Corporation (NLDC) to the distribution list.	Fromer	Comment noted.
107	27 June 2007	The vast majority of New London residents are proud that the Coast Guard would consider our city as a site for the museum and grateful that it will become one of our leading institutions.	Teeson	Comment noted.
108	27 June 2007	I strongly support the establishment of the USCG Museum at the Fort Trumbull site in New London.	O'Neill	Comment noted.
109	29 June 2007	The museum provides a great opportunity to enhance the City of New London and promote progress at the Fort Trumbull municipal development project areas. The museum will provide a quality, high-profile addition to our development program.	Cronin	Comment noted.
110	2 July 2007	I support the National Coast Guard Museum in the City of New London at Fort Trumbull MDP Parcel 1A. The National Coast Guard Museum will become an important and valuable community resource for many years to come.	Nossek	Comment noted.
111	3 July 2007	I strongly favor locating the Museum at Fort Trumbull Parcel 1A. Development of the National Coast Guard Museum is critical to the future of our community.	Devine	Comment noted.
112	3 July 2007	The NLDC opined that "[the documented analysis includes a "Finding of No Significant Impact" (FONSI), which is a necessary step in the process of bringing the National Coast Guard Museum to New London." This statement supports my belief in the predetermination of site selection. The quote pointedly indicates that the NLDC has reason to believe that the CG treats NEPA and the EA as mere formalities and supply the justifications for the CG selection.	Fromer	Section 8.0 has been revised to more clearly indicate the difference between a draft FONSI and a final FONSI. A draft FONSI does not indicate a predetermination, as this document is prepared based on the findings within the draft EA. The FONSI only indicates that, in this instance, the Fort Trumbull alternative and the Riverside Park alternative would not result in any significant impacts should the proposed new National Museum be constructed and operated at the alternative site locations, as identified in the EA. The draft FONSI was written and conducted in accordance with NEPA (Section 651.14(b)(2)).
113	5 July 2007	The Proposed National Coast Guard Museum fails to meet the criteria for a water-dependent use and does not even support a water-dependent use; therefore, it lacks consistency with the Connecticut's Coastal Management Act as it implements the federal Coastal Zone Management Act.	Fromer	Refer to response to comment #57.
114	6 July 2007	Support of locating the US Coast Guard Museum on the Fort Trumbull peninsula in the City of New London.	Mayer	Comment noted.
115	6 July 2007	We look forward to receiving approval for this important project.	McLaughlin	Comment noted.
		*Cody, Sue Ann. "Historical Museums on the World Wide Web: An Exploration and Critical Analysis." <i>The Public Historian</i> 19, No. 4 (Fall, 1997), p. 40.		



**PUBLIC COMMENTS AND RESPONSES
JUNE 2008 DRAFT EA
(FINAL EA ONLY)**



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APPENDIX I

Photo Log



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Photograph No. 1

Aerial Photograph of the Fort Trumbull Area, taken in 2002.



Photograph No. 2

Aerial Photograph of the Fort Trumbull Area, taken in October 2006.



Photograph No. 3

View of the Fort Trumbull area (Parcel 4A and Fort Trumbull) from Thames Street in Groton, Connecticut.





Photograph No. 4

Entering into the Fort Trumbull Area. Facing east from Howard Street.



Photograph No. 5

Alternative 1 and 2 – Parcel 1 and Parcel 1A from access way. Facing northeast, toward Groton, Connecticut.



Photograph No. 6

Adjacent site to the west (Parcel 1B) and railroad tracks. Facing northwest.





Photograph No. 7

Parcel 1 and Parcel 1A,
facing northeast from the
lower corner of the site.
Note the fishing wharf in
the background.



Photograph No. 8

The southeast corner of Parcel 1
and Parcel 1A, and the River Walk.
Facing east from the southwest
corner of the Site.



Photograph No. 9

The western boundary of Parcel
1A and the northwest corner.
Facing north, toward downtown
New London, Connecticut.





Photograph No. 10

View of the northeast corner of Parcel 1 and Parcel 1A, the commercial fishing wharf and the River Walk. Facing northeast, toward Groton, Connecticut.



Photograph No. 11

View of the southeast corner of the Parcel 1 and Parcel 1A and adjacent properties. Facing south toward Fort Trumbull State Park and Parcel 4A.



Photograph No. 12

View of General Dynamics in Groton, Connecticut and the River Walk. Photograph taken from the southeast corner of Parcel 1 and Parcel 1A.





Photograph No. 13

View of the Fort Griswold Monument in Groton, Connecticut. Photograph taken from the northeast corner of the Site, facing east.



Photograph No. 14

View north toward I-95 and the New London Ferry terminal. Photograph taken from the northern boundary of Parcel 1 and Parcel 1A.



Photograph No. 15

View of downtown New London and the Fort Trumbull area from I-95 northbound, facing south.





Photograph No. 16

Northern boundary of Parcel 4A along Walbach Street, facing east.



Photograph No. 17

Western boundary of Parcel 4A along Smith Street, facing south. Photograph taken from northwest corner of site at intersection of Walbach and Smith Streets. Note the large Pfizer building in the background.



Photograph No. 18

View of the adjacent property to the west of Parcel 4A, the wastewater treatment plant. Photograph taken from Smith Street.





Photograph No. 19

Southern boundary of Parcel 4A along Trumbull Street, facing east.



Photograph No. 20

Southwest corner of Parcel 4A and a suspected wetland, facing northeast.



Photograph No. 21

View from the southeast corner of Parcel 4A, facing southeast.





Photograph No. 22

Eastern boundary of
Parcel 4A along East
Street, facing northwest.



Photograph No. 23

Facing southeast toward Long
Island Sound. Photograph taken
from the central portion of Parcel
4A



Photograph No. 24

View of the Thames River and
General Dynamics in Groton,
Connecticut, facing east from
Parcel 4A. Note Fort Trumbull
State Park in foreground.





Photograph No. 25

View north toward Parcel 1A from the northeastern corner of Parcel 4A.



Photograph No. 26

View of downtown New London and the Fort Trumbull area from I-95 northbound, facing south.



Photograph No. 27

View of the Fort Trumbull area (Parcel 1A) from Thames Street in Groton, Connecticut.





Photograph No. 28

Main entrance to Riverside Park, off Adelaide Street. Facing northeast.



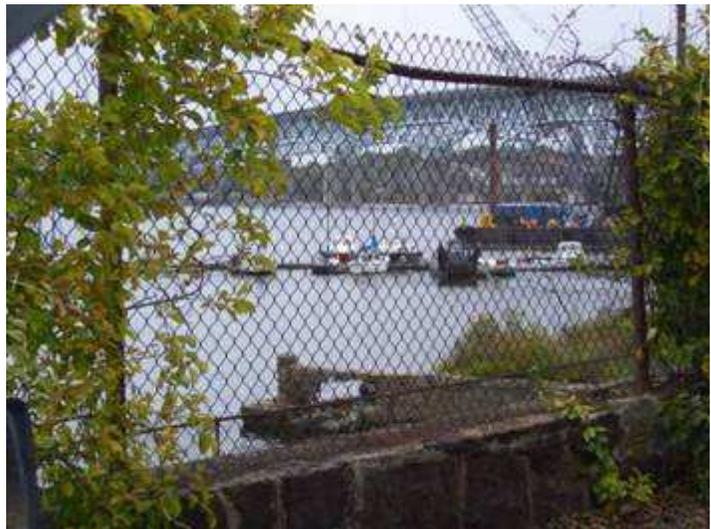
Photograph No. 29

View to the south of Riverside Park from the southern boundary.



Photograph No. 30

View of I-95 and a commercial fishing wharf from the southeast corner of Riverside Park.





Photograph No. 31

View of the railroad tracks and the Thames River on the eastern boundary of Riverside Park.



Photograph No. 32

The footbridge that crosses the railroad tracks. Facing east along the eastern boundary of Riverside Park.



Photograph No. 33

View of western boundary and the southern Riverside Heights entrance from Rosemary Street.





Photograph No. 34

The northern portion of Riverside Park, facing northeast. Photograph taken from Riverside Heights.



Photograph No. 35

Northern entrance to Riverside Park at the intersection of Riverside Heights and Crystal Avenue. To the north of the fence is the United States Coast Guard Academy and to the south of Riverside Heights is the Courtview Square apartment complex.



Photograph No. 36

View of Riverside Heights, facing south. To the east of the road is the backside of Winthrop Elementary School and to the west is the United States Coast Guard Academy.





Photograph No. 37

View of the Thames River and Groton, Connecticut from Riverside Park.



Photograph No. 38

View north from I-95, toward Riverside Park and the United States Coast Guard Academy.



Photograph No. 39

View of Riverside Park and the United States Coast Guard Academy from Fairview Avenue in Groton, Connecticut. Note the proximity of Riverside Park to the I-95 bridge in the left of the photograph.



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