

Appendix G
Comments Received on the Draft EA and USCG Responses

TOWNSHIP OF MIDDLETOWN

Township Hall, One Kings Highway
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Settled in 1664
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Via Email and First Class Mail

August 29, 2014

Lynn Keller, EI, PMP
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612
Lynn.M.Keller@uscg.mil

Re: Draft Environmental Assessment
Hurricane Sandy Proposed Recapitalization Project
Rebuild USCG Station Sandy Hook, New Jersey

Dear Ms. Keller:

The following is submitted pursuant to your PUBLIC NOTICE regarding the United States Coast Guard's [USCG] Proposed Recapitalization Project, and its effects on The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.

Part of the mission of the Middletown Landmarks Commission (MLC) is to insure that the historic integrity of the districts and historic structures within the Township is maintained for future generations. While much of this Project calls for repair or replacement of like with like structures, there are a number of initiatives that are cause for concern to the MLC. A brief description of each is provided below.

- Some of the proposed renovations are sited in different locations than the structure to be replaced. It is my understanding that this would trigger an archaeological investigation under Section 106 rules.



Celebrating 350 Years of Community and History

- The Project as proposed makes no effort to take advantage of the existence of usable buildings whose renovation and adaptation to the needs of the USCG would contribute to preserving the integrity of the District.
- Replacement or expanded structures would adversely affect the spatial layout of the historic landscape.
- The design of the Buildings appears to make no reference to building forms or materials found in the District.
- Buildings that are constructed or renovated at a scale larger than the existing structures would have an adverse impact on the historic integrity of the site. This is particularly true of the MMB, which appears to be in clear violation of Standard 9. Although it would adversely impact the viewshed of a number of buildings, the MMB would be virtually on top of the Chem Lab/Schoolhouse, Bldg. #109. That building is one of the most important buildings in the Landmark District, being one of only two first order buildings. There are also two first order structures in the District, the 1901-1919 Proof Battery (HS 174A) and the Powder Magazine (HS 350), but these are not usable buildings.
- The proposed demolition of several structures would destroy significant parts of the Landmark District's history.

St. Mary's Chapel (Rod and Gun Club) (HS 123) is evidence that the Landmark represents an active community, that had more than a simple military function. This was not built as a temporary structure, but as an essential element of that community.

The Former Exchange/ESD Building (Bldg. # 103) is one of the few surviving WWII era buildings. The Fort Hancock community grew to more than 10,000 people at the height of WWII, but little evidence remains of that period. To destroy one of the few remaining examples of buildings of that very important periods in the District's history would be a disservice.

In closing, I would like to thank you on behalf of the MLC for the opportunity to comment on this project. It is the goal of the MLC to help preserve and protect all of the historic architectural and cultural resources located within Middletown Township. The MLC is always willing and

able to be of assistance to the USCG as this project proceeds. Feel free to contact us if we can be of any further assistance.

Yours Truly,

A handwritten signature in black ink that reads "Gerry Scharfenberger". The signature is written in a cursive style with a large, prominent initial "G".

Gerry Scharfenberger, Ph.D.
Chairman, Middletown Landmarks Commission

USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project

Letter G1: Township of Middletown

TOWNSHIP OF MIDDLETOWN
Township Hall, One Kings Highway
Middletown, NJ07748-2594

Date of Letter: 29 August 2014

Comment G1-a. Some of the proposed renovations are sited in different locations than the structure to be replaced. It is my understanding that this would trigger an archaeological investigation under Section 106 rules.

USCG Response: USCG completed a Phase I Archaeological Survey Work Plan in December of 2013, in which all proposed areas of disturbance due to construction were scoped for surveying and shovel test pit excavations. The Phase I Archaeological Survey field work was conducted in January of 2014, in accordance with the Secretary of the Interior's standards and guidelines for archaeology and the New Jersey Historic Preservation Office (NJ HPO) guidelines. An Archaeological Survey Report of findings was submitted to NJ HPO in April of 2014. NJ HPO reviewed the report with no comments, and made recommendations to USCG for avoidance of archaeological resources. These avoidance measures have been incorporated into the USCG work specifications for ground disturbing activity at Station Sandy Hook. Preparation and execution of an Archaeological Resources Avoidance Plan, including reviews by NJ HPO, has also been adopted as a mitigation component of the fully executed National Historic Preservation Act (NHPA) Section 106 Memorandum of Agreement (MOA) among USCG, NJ HPO, and ACHP to support this recapitalization plan.

Comment G1-b. The Project as proposed makes no effort to take advantage of the existence of usable buildings whose renovation and adaptation to the needs of the USCG would contribute to preserving the integrity of the District.

USCG Response: USCG thoroughly reviewed the reuse potential for the existing structures on site at USCG Station Sandy Hook prior to proposing to build new structures. The existing non-historic Boathouse is obsolete and can no longer accommodate the size and type of boats and maintenance required at the Station, and therefore needed to be rebuilt. The existing Small Arms Firing Range (SAFR) was built atop the historic subsurface Casemate Structure 541, which was a section of the historic fortifications built by the Army in 1910 to act as a control center for detonating submerged mines. The existing non-historic SAFR could not be retrofitted to meet current code requirements, and therefore needed to be rebuilt at another location. The recapitalization effort would include demolition of the non-historic components of the existing SAFR in order to restore the Casemate structure to its original configuration, and

construction of a new, modern SAFR at another previously developed location. The existing non-historic Station Building is obsolete and could not be retrofitted to meet mission needs, and could not be rebuilt in its existing location due to the sizing requirements of the proposed new Boat Maintenance Facility (BMF).

The remaining structures at Station Sandy Hook were considered for reuse, but had to be dismissed from further consideration due to their failure to meet mission requirements for the three proposed new structures. None of the existing structures meet the required floodplain elevations for mission critical facilities required to utilize the congressionally allocated Hurricane SANDY recapitalization funds. The existing buildings do not meet the resiliency and operational requirements for the Coast Guard mission, are located in FEMA Zone V, and have floor elevations below the 500-year flood level. For continuity of operations, the Coast Guard desires, and Congressional funding requires, that facilities are to be flood- and hurricane-resilient and constructed to withstand the combined impacts of wind, erosion, and waves during a 500-year storm event. In addition, the existing structures at Station Sandy Hook all had one or more of the following discrepancies that disqualified them from further consideration for reuse:

- Structures could not reasonably be elevated to meet floodplain elevation requirements;
- Structures were located too far from the required proximity to the communications center and boats in order to meet quick response requirements for search and rescue and law enforcement operations;
- Structures are undersized and do not meet the space requirements to support current operational needs;
- Structures would need extensive rehabilitation to make them structurally sound, water tight, and habitable; and,
- Structures lack utility infrastructure which would be costly to install and would increase ground disturbance and impacts on potential archaeological and environmentally sensitive areas.

Comment G1-c. Replacement or expanded structures would adversely affect the spatial layout of the historic landscape.

USCG Response: The lateral USCG footprint at Station Sandy Hook will actually be reduced overall, as underutilized mission support functions, such as housing, are reduced, and operations shift closer to the waterfront with the proposed recapitalization. The proximity of the new structures to the waterfront area condenses the USCG campus into mission essential operations space, and allows a buffer zone between the rest of the historic structures and open land. An extensive planning process was utilized in order to identify the best means available to restore form and function to the mission-critical USCG Station Sandy Hook facility. USCG mission needs for Search and Rescue and Law Enforcement require an operational USCG facility at the existing Station Sandy Hook site in order to adequately serve its area of concern in and around the Sandy Hook Bay. The proposed new structures would be located within the National Historic Landmark-designated Fort Hancock and Sandy Hook Proving Ground Historic District.

There is no other acceptable site location that meets time critical deployment distances for responses to distress calls. Three of the significantly damaged structures are proposed to be rebuilt. Two of the three structures are proposed to be rebuilt in different locations than the existing structures in order to utilize the highest elevations at the site for protection from flood waters. The overall USCG facility footprint will shrink with the proposed recapitalization work; unnecessary and obsolete non-historic structures will be demolished and new structures that meet the current USCG mission needs will be built to replace them. Due to requirements to build new structures to withstand the 100-year and 500-year flood plain elevations, all of the new structures will be taller than the existing structures, so that critical equipment and facilities remain at the proper elevation to sustain hurricanes, floods, and storms.

Comment G1-d. The design of the Buildings appears to make no reference to building forms or materials found in the District.

USCG Response: The architects who prepared the design for new construction at USCG Station Sandy Hook were aware of the design characteristics of buildings within the NHL district, and attempted to utilize a number of these in the design of the new BMF, Multi-Mission Building (MMB), and SAFR. As one example, the massing of the MMB includes elements in common with the Existing Building #109 School House. The core sections of both buildings have broad central wall planes with a hip roof. Both buildings are also masonry clad. The historic school has a buff-colored stone with red sandstone trim, and the MMB has red brick on the bottom level and buff-colored trim. The use of darker brick on the top level of the MMB creates the sense of more limited building volume than if both levels were the same red color. As discussed above, the BMF references elements of Engineering Building #S503, specifically the vertical piers and the monitor light. The SAFR building references Engineering Building #S503 forms found in the district by breaking up the wall planes into vertical bays. These individual bays are consistent with older building scales and, along with the articulation of functional areas, helps to prevent the building from presenting monolithic walls to the viewer.

Comment G1-e. Buildings that are constructed or renovated at a scale larger than the existing structures would have an adverse impact on the historic integrity of the site. This is particularly true of the MMB, which appears to be in clear violation of Standard 9. Although it would adversely impact the viewshed of a number of buildings, the MMB would be virtually on top of the Chem Lab/Schoolhouse, Bldg. #109. That building is one of the most important buildings in the Landmark District, being one of only two first order buildings. There are also two first order structures in the District, the 1901-1919 Proof Battery (HS 174A) and the Powder Magazine (HS 350), but these are not usable buildings.

USCG Response: The existing MMB is located in both FEMA Zones A and V and has a first floor elevation of 8 feet. FEMA Zone A requires 12 feet for the 100-year flood elevation and 15 feet for the 500-year flood elevation. FEMA Zone V requires 14 feet for the 100-year flood elevation and 19 feet for the 500-year flood elevation. The MMB

is an essential facility with mission critical functions, thus the new facility must be constructed with a first floor above the Zone V 500-yr flood plain elevation of 19 feet.

Additional considerations for the new MMB site include constructing the new structure in a previously disturbed area to reduce the chance of disturbing underground archeological artifacts and an attempt to avoid building on vacant, unencumbered land. In addition, the proposed MMB site utilizes the best available higher ground, with existing elevation of 11 feet; this substantially reduces the building foundation costs. Proposed site development costs are also less as there are existing utilities and parking that may be utilized with the selected location and no need for temporary facilities during demolition and construction phases. Overall, the proposed MMB footprint is approximately 50% less cost than it would be to build on the existing MMB building footprint.

The proposed MMB must be constructed in the location near existing Buildings #103 and #109 due to mission requirements for proximity to the boats and to have visual sight of the boat basin area for Command Center operations. The proposed new MMB would be at least eighty feet from Building #109. USCG has conducted archaeological surveys in areas proposed for ground disturbance, including the area around Building #109 in an effort to identify and avoid impacts to archaeological resources. Mitigation measures as defined in the fully executed MOA between the USCG, NJ HPO, and the Advisory Council on Historic Preservation (ACHP), require USCG to implement a vibratory monitoring plan during construction operations on National Park Service (NPS) and NJ HPO-identified structures in proximity to the proposed construction work. This vibratory monitoring plan shall include Building #109, and will monitor the structure for any damage incurred due to vibration impacts. As an additional mitigation measure in the MOA, USCG shall prepare a Cultural Resources Management Plan to inventory and assess historic structures at Station Sandy Hook, including Building #109, and better facilitate their management.

Comment G1-f. The proposed demolition of several structures would destroy significant parts of the Landmark District's history.

St. Mary's Chapel (Rod and Gun Club) (HS 123) is evidence that the Landmark represents an active community, that had more than a simple military function. This was not built as a temporary structure, but as an essential element of that community.

The Former Exchange/ESD Building (Bldg. # 103) is one of the few surviving WWII era buildings. The Fort Hancock community grew to more than 10,000 people at the height of WWII, but little evidence remains of that period. To destroy one of the few remaining examples of buildings of that very important period in the District's history would be a disservice.

USCG Response: Building 123 was originally constructed in 1901 by the Army as the First M.E. Church, and it later became the St. Mary's Catholic Chapel. In later years the structure was used as the Base's Rod & Gun Club and the Recreation Center. Although

Building 123 is considered a contributing structure to the National Historic Landmark District and appears on the nomination, the only original material remaining in the building is the wood framing. The portico and porch of the structure have been in-filled. In 1995, due to exterior building materials being badly deteriorated and numerous leaks throughout the building, an exterior repair project replaced all of the exterior building materials including asbestos siding; the trim, roofing and windows were also replaced. In 1995-1996, an interior renovation project gutted and replaced the entire interior of the structure down to the wall studs.

The structural integrity of Building #123 was lacking prior to Hurricane SANDY. The foundation system design is primitive; it consists of brick piers reinforced with wooden beverage kegs filled with concrete. Hurricane Sandy displaced the building from its foundation system when approximately one foot of water flooded through the structure. Additionally, sink holes around the exterior foundation indicate a compromised foundation and washout of surrounding soils. Following Hurricane SANDY, the interior of the structure has been stripped to the wall studs up to three feet due to water damage from flooding. Due to below freezing temperatures in winter 2014 paired with pressed fit pipe connections, a water pipe froze and broke under the structure, again filling the basement of Building #123 with several feet of water. Building #123 cannot be adequately repaired at a reasonable cost due to the extent of interior and exterior damage, and its inadequate foundation system. Additionally, a Recreation Center is no longer needed at Station Sandy Hook since there will no longer be collocated housing units on the site. The location of Building #123 is also the preferred location for the new MMB due to floodplain elevation considerations, and therefore demolition of Building #123 would still be required for the proposed new MMB.

As agreed upon by USCG, NJ HPO, and ACHP in the fully executed NHPA Section 106 MOA, USCG shall perform Level II historic recordation of contributing structure Building #123, in accordance with Historic American Buildings Survey (HABS) Standards as mitigation for the proposed demolition of Building #123. USCG shall work closely with NJ HPO and NPS to satisfactorily complete the recordation prior to conducting any demolition work on Building #123.

Building #103 (Exchange/ESD) is no longer needed due to lack of housing at the Station that the Exchange would serve. Building #103 is a one story wood framed block, three bays wide and thirteen bays long (38 feet by 157 feet) with a gabled roof originally built in 1941. A wood framed shed with a gabled roof adjoins the southeast corner of the structure. The structure has been continually altered over time and retains few of its original finishes and details. The interior was extensively renovated for shop use at the time of the historic nomination in 1982. In 1983, a report was prepared by John Milner Associates, Inc. of West Chester, PA, in which Building #103 was evaluated and determined that, although it was originally a part of Fort Hancock, it had been significantly renovated for shop use and was determined to have no architectural or historic significance. Additionally, the siding and windows have been replaced, and the only remaining historic fabric of the building is the wood framing and sheathing. Building #103 does not meet the requirements for a structure of architectural or historical

significance because it lacks association with an historic event or past significant person, does not embody the distinctive characteristics of a type, period, or method of construction due to significant structural alterations since its construction, and is not likely to yield important historical information. The NJ SHPO concurs with the Coast Guard's determination that Building #103 does not contribute to the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.



ARMY GROUND FORCES ASSOCIATION

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Promoting and facilitating research, interest and pride in the history of our Army's Coast Artillery Corps

(Revised) 29 August 2014

Lynn Keller, EI, PMP
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612

Reference: Draft EA "Rebuild USCG Station Sandy Hook, New Jersey"

Dear Ms Keller,

Army Ground Forces Association has partnered with the National Park Service Sandy Hook unit, Fort Hancock Sandy Hook Proving Ground National Historic Landmark (NHL) for over 10 years. Our focus has been the restoration, preservation and interpretation of Battery Gunnison/New Peck and other seacoast defense structures at Fort Hancock. We are a diverse organization, with private and public sector professionals, retired and active duty military to include senior field grade and general officers with extensive installation management and military construction experience. An AGFA board member was appointed by the Secretary of the Interior to the Fort Hancock 21st Century Federal Advisory Committee.

We are an interested party that consults with NPS at Fort Hancock on various actions and our comments and recommendations to the USCG are sent with the spirit of cooperation and support we provide to NPS.

Our comments will address the following specifically:

- 1) Compliance with Executive Order 13287: "Preserve America" with regard to renovating and using historic properties before constructing new facilities.
- 2) Compliance with OMB memorandum M-12-12, "Promoting Efficient Spending to Support Agency Operations", real property section on "Freeze the Footprint".
- 3) Demolition of the existing Building #103 (constructed 1941, Former Exchange/ESD Building) and existing Building #123 (constructed in 1901, modified in 1946, former St. Mary's Chapel, later Unit Chapel and Rod & Gun Club). Bldg #123 is a contributing structure to The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.
- 4) Construction of a new Multi-Mission Building (MMB) located in the area of the existing Building #103 and Building #123
- 5) Status of Building #109, the former proving ground laboratory.
- 6) Status of Buildings #141 and #142, former 1939 constructed Bachelor Non-commissioned Officer's Quarters and other structures across the USCG section of the NHL
- 7) Consultation process and public engagement with this Environmental Assessment
- 8) Concept of a future "Fort Hancock Sandy Hook Proving Ground NHL Planning Committee" that would enable both government and interested party cooperation on current and future preservation, restoration and interpretation of the NHL (all of Sandy Hook peninsula).

Item #1, we found no mention of EO 13287: "Preserve America". The proposed work is being conducted entirely on a National Historic Landmark district, and several contributing elements to the landmark will be directly impacted. We are aware that Executive Order 13653 — "Preparing the United States for the Impacts of Climate Change" and its evolving implementation guidance makes reuse at Fort Hancock NHL more challenging. However, we are fairly confident that NHL status will offset some of the more onerous requirements of EO 13653. Of all the historic structures that either contribute to the Ft Hancock NHL or otherwise of historic significance, none appear to be designated for viable reuse. We see this as a very significant element of non-compliance with the intent of the 1964 Historic Preservation Act and the 1935 Act that implemented the Landmark program. **RECOMMENDATION**: Review the proposed EA with regards to compliance with EO 13287 and make a stronger effort to reuse existing historic facilities as opposed to inflexibly following implementation guidance of EO 13653 and the 500 year flood level. Ensure viable reuse of as many historic structures to include Bldg #109, #141, #142 and others.

Item #2, we understand the USCG must comply with OMB guidance to "Freeze the Footprint". In our review of the EA, we were not able to judge actual compliance with the requirement and how the different demolition actions contribute. Since the OMB guidance only applies to warehouses and administrative buildings, this is an important consideration. The MMB is an administrative building, and conceptually Bldg #103 and #123 are administrative as well. **RECOMMENDATION**: Provide an assessment in the EA of square footage compliance with "Freeze the Footprint" with regard to preserving historic footprint versus building new.

Item #3, we found the demolition of Bldg #103 and #123 to be objectionable. The USCG justification to demolish Bldg #103 because prior USCG modifications to the building reduced/eliminated the building's historic value is questionable. While the NJ SHPO appears to agree with this assessment, citing prior rehabilitations as the reason for the reduction in historic value raises questions regarding prior Section 106 compliance. Failure to comply in the past should not serve as justification for future demolition. It would be most unfortunate to see this approach applied to Bldg #109 via a significant non-compliant modernization and subsequent determination that historic character is lost. Additionally, the EA does not appear to address other potential locations for the MMB or how the existing Bldgs #103 and #123 could be used to fulfill some of the mission requirements. While Bldg #123 clearly does not meet Anti-Terrorism/Force Protection (AT/FP) stand-off standards, Bldg #103 probably does. There are approximately 6 remaining World War II wood structures on the Fort Hancock NHL. Demolition of Bldg #103 reduces that number by one. **RECOMMENDATION**: Review options to preserve/reuse Bldg #103 and #123 in a way that supports both mission and historic preservation guidelines. Consider incorporation of Bldg #103 in a revised design for MMB. Consider the use of Bldg #103 as a "blow out" administrative level since it is below the 500 year flood level.

Item #4, we found this building's design to be incompatible with Secretary of the Interior's Standard #9 for historic preservation. Part of the standard states "new work shall be...compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment". The 1999 NPS "Fort Hancock Rehabilitation Guidelines" cites a new USCG Engineering building at Fort Hancock (USCG station) "employs masonry details and building forms found in the historic warehouses" at Fort Hancock (see file at http://www.forthancock21stcentury.org/real_property). This clearly shows that USCG has in the past complied with the Secretary's standards in a laudatory manner. The current building plans as outlined in the USCG EA show a building in excess of 50 feet high – higher than any other buildings on the Fort Hancock NHL. There does not appear to have been any consideration given to innovative alternatives such as using the 1st floor as a non-critical "blow out" floor to mitigate 500 year flood height. Constructing two floors without the 15 feet of piling (1st floor is a "blowout floor"), a lower roof height that is historically compatible with the Secretary of the Interior's standards should be considered. It is not clear that all viable locations have been adequately explored and ruled out. This needs to be either more convincingly shown within an analysis in the EA, or other location options need to be addressed appropriately. We noted the Memorandum of Agreement

among the USCG, the NJ SHPO and the Advisory Council on Historic Preservation states that “USCG shall continue to work with SHPO and NPS in order to make the new structures more compatible with the surrounding National Historic Landmark district”. We strongly desire to see this implemented during deliberations and design. **RECOMMENDATION:** Ensure all parties desiring consultation are advised of USCG plans to modify the MMB and have ample time to review the plans and provide comment back to USCG. Consider including Bldg #103 in some way in the redesign of the MMB (maybe a reduced footprint portion can be used in a non-operational capacity such as a snack bar or other non-mission essential capacity).

Item #5, we found no mention, outside of the future creation of a Cultural Resource Management Plan (CRMP) of the fate of the vacant and deteriorated Bldg #109. As a first order historic structure of the Sandy Hook Proving Ground, its deteriorated condition is most unfortunate. **RECOMMENDATION:** Include in the recapitalization action a plan to reuse Bldg #109 in a way that preserves its inherent relationship to the landmark and meets USCG needs. While it likely does not meet AT/FP standards, it can be used for administrative and support purposes. Restoration and use of this building will also mitigate the destruction of other historic structures.

Item #6, though this EA indicates that a wholesale recapitalization of the USCG station is contemplated, we found no reference to other historic structures on the installation such as Bldg #141 and #142. As recently as 2009, AGFA members noted USCG enlisted personnel billeted in those structures. We are now hearing that no USCG personnel will be billeted at the station. This calls into question the operational importance of the station if billeting and housing are removed. Many members of AGFA have extensive military experience and all agree this makes response times more lengthy than if personnel were living on the installation. While the NHL document states these are non-contributing historic structures, they were critical to the wartime operations of Fort Hancock, and their construction time (1939) and technique make them clearly germane to the NHL. The prior investment of taxpayer funds by both the Army and USCG make further use of what appear to be sound buildings desirable. Reuse will also increase compliance with Executive Order 13287 “Preserve America”. **RECOMMENDATION:** Provide a review of the plans for the entire station in the EA and specifically identify the plans for reuse of all historic structures on the USCG station to include Bldgs #141 and #142.

Item #7, we found that notification of consultation, while identified as a requirement in the EA, failed to actually occur as mandated, nor in a timely manner. The one AGFA member on the Fort Hancock 21st Century Advisory Committee was only made aware of the EA on Monday 25 August. The AGFA member of the committee was informed by the committee co-chairs on the same day they were informed of the EA – with less than two weeks to review and comment before the closure of public comment. It appears that the Sandy Hook Foundation failed to receive notification, based on discussions between board members of the two organizations. The public comment period on the draft EA is only 17 days long and provides very little time to provide a reasonable review of the material and develop cogent and helpful recommendations to USCG. The public comment period should be at least 30 days. **RECOMMENDATION:** Make the public comment period 30 days. Extend the current period of comment to 15 September. Make a viable effort to confirm receipt of notifications of an EA or other action for public comment under Section 106 using both US Mail confirmation and E-mail return receipt indicator. Ensure notification of Army Ground Forces Association by using the e-mail Info@ArmyGroundForces.org and the Sandy Hook Foundation by using e-mail at shfinc@monmouth.com. Contact the Fort Hancock 21st Century Federal Advisory Committee as directed on the committee website <http://www.forthancock21stcentury.org/home> . Seek out organizations with standing outside of statutory consultation (i.e., Indian Tribes and property owners) to the maximum extent possible.

Item #8, in reviewing the draft EA and consultation with the NPS and NJ SHPO offices, it appears there is a strong need for a standing body that meets periodically to discuss current and future preservation,

restoration and interpretation of the entire Fort Hancock Sandy Hook Proving Ground National Historic Landmark District. This is in fact the entire Sandy Hook peninsula. RECOMMENDATION: That USCG work closely with USNPS at Fort Hancock NHL to establish a consulting and planning organization that includes USCG, USNPS, and all partners at Fort Hancock NHL to include American Littoral Society, National Oceanic and Atmospheric Administration, New Jersey Sea-Grant Consortium, Clean Ocean Action, Army Ground Forces Association, Marine Academy of Science and Technology, Middletown Committee, Sandy Hook Foundation and others as may be appropriate. This body could conceivably perform functions similar to an Army Installation Planning Board with regard to facility use and associated interpretation where appropriate.

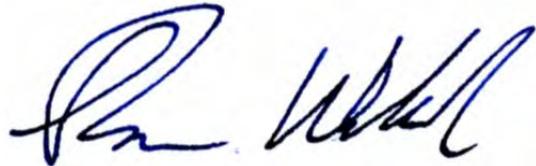
We realize that USCG is under "fiscal timeline obligation constraint" from the USCG memo to USFW in 7 August 2014 and in the Memorandum of Agreement stating the USCG must "... meet the Congressional mandate to obligate these Hurricane Sandy recapitalization funds by September 2014". However, lack of time does not negate compliance requirements regarding the Fort Hancock NHL. The specific citation in the MOA that fiscal considerations are driving this is questionable given the option of requesting congressional relief of the time line due to the complexities of NHL status compliance (request extension of appropriation authorization authority).

We offer our thoughts and recommendations in a spirit of cooperation. We believe it is essential that we work together with all partners in the preservation and interpretation of our mutual trust, the Fort Hancock Sandy Hook Proving Ground National Historic Landmark.

Sincerely,



Andrew Bennett
President, Board of Directors
Army Ground Forces Association



Shawn Welch
Finance Officer (Treasurer)
Member, Board of Directors
Army Ground Forces Association



Michael J. Murray
Member, Board of Directors
Army Ground Forces Association



Boyd Douglas Houck
Member, Board of Directors
Army Ground Forces Association

USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project

Letter G2: Army Ground Forces Association

Army Ground Forces Association
401 N 12th Street, Frederick Army Airfield
Frederick, Oklahoma 73452

Date of Letter: 29 August 2014 (revised letter)

Comment G2-a. Review the proposed EA with regards to compliance with EO 13287 and make a stronger effort to reuse existing historic facilities as opposed to inflexibly following implementation guidance of EO 13653 and the 500 year flood level. Ensure viable reuse of as many historic structures to include Bldg #109, #141, #142 and others.

USCG Response: As stated in EO 13287, *where consistent with agency missions*, agencies shall advance this policy through protection and continued use of historic properties. USCG thoroughly reviewed the reuse potential for the existing structures on site at USCG Station Sandy Hook prior to proposing to build new structures. Congress requires that Hurricane SANDY recapitalization funding only target rebuilding mission critical USCG facilities and that all mission critical structures meet the 500 year flood plain requirements; for this reason alone, no existing historic structures at Sandy Hook meet the agency criteria for reuse. USCG facilities must be able to support USCG operations throughout floods, hurricanes, and natural disasters; disaster response is a cornerstone of the USCG function as an agency. Having resilient infrastructure in place to support this mission is essential in order to allow USCG to continue lifesaving operations, since USCG is the first responder in disaster situations. Please see USCG response to comment G1-b and G1-e (Township of Middletown) for additional information on reuse of historic structures and meeting floodplain requirements as mandated by the congressional funding allocated to rebuild Station Sandy Hook.

Several mitigation components within the fully executed MOA among USCG, NJ HPO, and ACHP shall ensure that USCG shall protect historic properties at Station Sandy Hook in accordance with EO 13287. USCG shall create and implement a comprehensive Cultural Resources Management Plan in order to inventory historic structures and better facilitate management of such. Additionally, an archaeological avoidance plan and vibratory monitoring plan shall be created and implemented prior to construction activities to ensure protection of historic resources.

Comment G2-b. Provide an assessment in the EA of square footage compliance with “Freeze the Footprint” with regard to preserving historic footprint versus building new.

USCG Response: USCG has evaluated the footprint of new facilities versus old during the NHPA Section 106 consultation process with NJ HPO and ACHP. For detailed footprint information, please see the 6 May 2014 letter from USCG to NJ HPO entitled *Additional Information Request on Proposed New Structure Locations – Hurricane Sandy Proposed Recapitalization Project to Rebuild USCG Station Sandy Hook, Monmouth County, New Jersey, HPO Project #13-1346-3* (EA Appendix C). The lateral USCG footprint at Station Sandy Hook will be reduced overall, as underutilized mission support functions, such as housing, are reduced, and operations shift closer to the waterfront with the proposed recapitalization. Please see the detailed USCG response to comment G1-c (Township of Middletown) regarding footprints.

Comment G2-c. Review options to preserve/reuse Bldg #103 and #123 in a way that supports both mission and historic preservation guidelines. Consider incorporation of Bldg #103 in a revised design for MMB. Consider the use of Bldg #103 as a “blow out” administrative level since it is below the 500 year flood level.

USCG Response: Please see the detailed USCG response to comment G1-f (Township of Middletown) regarding reuse potential for Buildings #103 and #123.

Comment G2-d. Ensure all parties desiring consultation are advised of USCG plans to modify the MMB and have ample time to review the plans and provide comment back to USCG. Consider including Bldg #103 in some way in the redesign of the MMB (maybe a reduced footprint portion can be used in a non-operational capacity such as a snack bar or other non-mission essential capacity).

USCG Response: The NHPA Section 106 consultation process for the Sandy Hook proposed recapitalization has resulted in completion of an MOA among USCG, NJ HPO, and ACHP. The NPS was a concurring signatory on this MOA as well. Throughout the development of the MOA, USCG has identified multiple cooperative means to continue to involve and cooperate with NJ HPO, ACHP, and NPS in the development of the design for the recapitalization. Please see the fully executed MOA for details on design review among USCG, NJ HPO and NPS (USCG Station Sandy Hook EA Appendix E) and public involvement conducted under NEPA for this process (USCG Station Sandy Hook EA Appendix F).

NJ HPO has concurred with the USCG determination that Building #103 no longer maintains its historic integrity and is not contributing to the historic district at Sandy Hook; NJ HPO has concurred that demolition of this structure does not constitute an adverse effect to the historic district. Additionally, Building #103 does not meet 500 year flood plain requirements and occupies the most viable space for placement of an MMB, due to its elevation and proximity and line of sight distance to the boat basin area. Please

see the detailed USCG response to comment G1-f (Township of Middletown) regarding reuse potential for Building #103.

Comment G2-e. Include in the recapitalization action a plan to reuse Bldg #109 in a way that preserves its inherent relationship to the landmark and meets USCG needs. While it likely does not meet AT/FP standards, it can be used for administrative and support purposes. Restoration and use of this building will also mitigate the destruction of other historic structures.

USCG Response: The NHPA Section 106 consultation process for the Sandy Hook proposed recapitalization has resulted in completion of an MOA among USCG, NJ HPO, and ACHP, and negotiated mitigation measures have been agreed upon and documented. Per congressional mandate, Hurricane SANDY funding cannot be used for any non-mission critical facility, and all mission critical structures must meet 500 year floodplain requirements; Building #109 does not meet either of these criteria. Building #109 cannot be reasonably retrofitted to meet floodplain or mission space requirements, has no utility infrastructure, and would require significant investment in order to make the structure habitable from a health and human safety standpoint due to water intrusion, mold, asbestos, and lead-based paint hazards. Additionally, Building #109 has extensive structural damage and traces of hazardous chemicals inside from its former use as a laboratory.

Comment G2-f. Provide a review of the plans for the entire station in the EA and specifically identify the plans for reuse of all historic structures on the USCG station to include Bldgs #141 and #142.

USCG Response: Detailed design plans have not yet been developed for the recapitalization effort; the environmental planning effort and NEPA process is in support of the development of a design-build contract request for proposal. Preliminary proposed exterior elevation renderings of the three new structures to support award of a design-build contract have been included in the EA as Appendix A.

Congress requires that Hurricane SANDY recapitalization funding only target rebuilding mission critical USCG facilities and that all mission critical structures meet the 500 year flood plain requirements; Buildings #141 and #142 do not meet either of these criteria for recapitalization funding and reuse. Additionally, these buildings do not meet the resiliency and operational requirements for the USCG mission. The structures are located in FEMA Zone V and have floor elevations below the 500-year flood level. Congressional funding requires that facilities are to be resilient and constructed to withstand the combined impacts of wind, erosion and waves during a 500-year storm event. Elevating these structures above the required flood level is not practical. Buildings #141 and #142 are also located too far from the waterfront to meet the mission and operational requirements for quick search and rescue and law enforcement response. The buildings are undersized and do not meet the space requirement for the number of ready crew berthing rooms for Coast Guard mission and personnel.

Buildings #141 and #142 are twin Georgian Revival apartment buildings constructed in 1930 for the Army. These buildings are National Park Service property. The structures are two-story wood frame buildings with yellow brick veneer, and large hipped roofs. The architectural vocabulary was intended to match earlier buildings at Fort Hancock, with yellow brick and corner quoins, but detailing was simpler and the materials less expensive. There are four apartments within each building, and the building plans have a T-shaped footprint with a central staircase. These structures have been considerably altered over time. The windows are vinyl, and brick jack arches have been replaced with precast lintels at the first floor. During prior consultations with NJ HPO for the windows and lintels, USCG obtained concurrence based on considerable building alterations over time, the relative insignificance of the building, and lack of historic fabric. Due to the loss of historic fabric over time, NJ HPO previously considered these buildings as non-contributing to the significance of the Sandy Hook Proving Ground and Fort Hancock Historic Landmark Districts.

Permanent personnel housing at Station Sandy Hook is no longer needed due to lack of demand at this remote location. Additionally, reuse of Buildings #141 and #142 would require extensive rehabilitation of structural components. The structures are not habitable and have extensive interior damage due to their location within the FEMA-designated "Coastal High Hazard Area." There is no utility infrastructure present to support reuse of these structures; installation of such would be costly and increase ground disturbance and potential impacts to archaeological and environmentally sensitive areas. The buildings have extensive cracking caused by movement of the wood framing and height of the unsupported brick veneer. Water has entered through the cracks, causing extensive water damage and mold, with additional damage to the brick veneer and structure. The significant amount of funding that would be required to execute repairs on these structures is not available at this time.

USCG shall create and implement a comprehensive Cultural Resources Management Plan in order to inventory all USCG Station Sandy Hook historic structures and better facilitate management of such. This plan shall be developed in cooperation with NJ SHPO, ACHP and NPS, as detailed in the NHPA Section 106 MOA completed for this recapitalization effort.

Comment G2-g. Make the public comment period 30 days. Extend the current period of comment to 15 September. Make a viable effort to confirm receipt of notifications of an EA or other action for public comment under Section 106 using both US Mail confirmation and E-mail return receipt indicator. Ensure notification of Army Ground Forces Association by using the e-mail Info@ArmyGroundForces.org and the Sandy Hook Foundation by using e-mail at shfinc@monmouth.com. Contact the Fort Hancock 21st Century Federal Advisory Committee as directed on the committee website <http://www.forthancock21stcentury.org/home>. Seek out organizations with standing outside of statutory consultation (i.e., Indian Tribes and property owners) to the maximum extent possible.

USCG Response: Given the compressed timeframe to meet congressional deadlines in order to execute Hurricane SANDY recapitalization funding prior to its expiration, USCG made a good faith effort to notify and solicit input from multiple federal, state, and local agencies, tribal entities, and historic and non-profit groups. Because congressional funds expire on 30 September 2014 if not obligated, extending the comment period to thirty days was not possible, and is not required by regulation

Section 4.4 of the EA describes the public participation plan prepared in accordance with 36 CFR Part 800.2, *Participants in the Section 106 process* and submitted by the Coast Guard to NJ HPO in a letter dated October 22, 2013. The plan identified four entities that would likely have interest in the effects of the undertaking on historic properties and two agencies entitled to participate as consulting parties. In a letter dated November 18, 2013, NJ HPO replied that the interested and consulting parties identified in the plan are appropriate and should be involved in the consultation process; these parties include:

- Preservation New Jersey
- Nike Historical Society
- The Sandy Hook Foundation
- Monmouth County Historical Association
- Fort Hancock 21st Century Advisory Committee
- New Jersey Lighthouse Society

On October 17, 2013, letters describing the project and location maps depicting the project area were sent via USPS mail to these organizations informing them of the opportunity to provide comments. The Coast Guard sent a letter entitled *Notification of Proposed Undertaking – Hurricane Sandy Recapitalization Project for USCG Station Sandy Hook, Monmouth County, New Jersey* signed by John Poland of USCG on 17 October 2013 and sent the Sandy Hook Foundation, to the attention of Betsy Barrett, President, Sandy Hook Foundation, Lighthouse Keeper's Quarters, 84 Mercer Road, Fort Hancock, NJ 07732.

At the request of the NJ HPO, the Coast Guard added two additional entities – the National Park Service Gateway National Recreation Area and the Middletown Township Historic Preservation Commission – to the list of consulting parties. The Coast Guard sent letters describing the project and location maps depicting the project area to these organizations informing them of the opportunity to provide comments on October 21, 2013, to NPS Gateway National Recreation Area and on October 17, 2013, to the Middletown Township Historic Preservation Commission.

On October 17, 2013, the Coast Guard also sent letters to 13 Native American Tribe or Recognized Tribal Representatives to inform them of this undertaking and notify them that formal Section 106 consultation will be initiated. The following Tribes and Tribal Representatives were notified:

- Absentee Shawnee Tribe of Oklahoma
- Delaware Tribal Preservation Officer
- Delaware Tribe of Indians
- Nanticoke Lenni-Lenape Indians of New Jersey
- Powhatan Renape Nation

- Ramapough Lenape Indian Nation
- Sand Hill Band of Indians
- Sand Hill Indian Association
- Shawnee Tribe of Oklahoma
- Stockbridge-Munsee Band of the Mohicans
- The Cherokee Nation of New Jersey
- The Cherokee Tribe of New Jersey
- The Delaware Nation

The Stockbridge-Munsee Tribal Historic Preservation Officer responded in a letter dated March 4, 2014, that, although the project is within Mohican territory, no cultural sites are located within the project area (Appendix C). The Delaware Nation responded in an electronic mail message dated November 14, 2014, that the location of the project does not endanger known archaeological sites of interest to the Delaware Nation (Appendix C). No responses were received from the other Tribes or Tribal Representatives.

The Coast Guard also requested input from the public on the issues to be addressed in the EA by publishing a public notice on October 6, 2013, in the *Asbury Park Press* (Appendix F in the EA). The notice described the Proposed Action and invited the public to submit comments to the Coast Guard by October 20, 2013. No comments were received. Finally, the Coast Guard notified the public of the availability of the draft EA through publication of a notice on August 17, 2014, in the *Asbury Park Press* (Appendix F). The draft EA was available for public review online at <http://www.uscg.mil/d5/PublicNotices.asp> or in hard copy at the Middletown Township Public Library.

Comment G2-h. That USCG work closely with USNPS at Fort Hancock NHL to establish a consulting and planning organization that includes USCG, NPS, and all partners at Fort Hancock NHL to include American Littoral Society, National Oceanic and Atmospheric Administration, New Jersey Sea-Grant Consortium, Clean Ocean Action, Army Ground Forces Association, Marine Academy of Science and Technology, Middletown Committee, Sandy Hook Foundation and others as may be appropriate. This body could conceivably perform functions similar to an Army Installation Planning Board with regard to facility use and associated interpretation where appropriate.

USCG Response: As part of the NHPA Section 106 MOA negotiated with NJ HPO, ACHP, and NPS for the recapitalization planning, a Communications Plan will be created to better facilitate planning and historic and natural resource management with NPS throughout the Fort Hancock and Sandy Hook Proving Ground, USCG Station Sandy Hook, and Gateway National Recreation Area.

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Via Email and First Class Mail

August 29, 2014

Lynn Keller, EI, PMP
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612
Lynn.M.Keller@uscg.mil

Re: Draft Environmental Assessment
Hurricane Sandy Proposed Recapitalization Project
Rebuild USCG Station Sandy Hook, New Jersey

Dear Ms. Keller:

The following is submitted pursuant to your PUBLIC NOTICE, and supports the need to prepare an Environmental Impact Statement (EIS) regarding the United States Coast Guard's [USCG] Proposed Recapitalization Project's adverse effects on The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District. We submit that, considering the available documentation, the design of all new buildings/structures proposed for construction is not compatible with the historic materials, features, size, scale, and proportion as well as the historic and architectural setting of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.

At the outset, I should explain myself and my interest in the issue. I am a life-long resident of the community, a community which has always valued the Coast Guard's presence. My specialty has always been Administrative Law [Customs & International Trade]. I advised the Sandy Hook Foundation [SHF], the official friends group for the Sandy Hook Unit of Gateway National Recreation Area, during the course of litigation where a local group sought, unsuccessfully, to stop NPS's plans for adaptive reuse within the Landmark District. Those plans unfortunately fell victim to economic conditions. I am also a member of the Army Ground Forces Association, whose main function has been the restoration and interpretation of Battery Gunnison/New Peck at Fort Hancock. As a Middletown resident, I have long been a proponent of the Township's recognition of Sandy Hook as a local historic district. For Middletown, the Hook's period of significance extends far beyond that of the Fort Hancock and Sandy Hook

Proving Ground National Historic Landmark District, with a long and significant pre-Colonial, Colonial, and Revolutionary history.

These Comments will address the USCG's proposal to:

- Replace the non-historic Boathouse with a new Boat Maintenance Facility in the same location as the existing Boathouse.
- Demolish the existing Building #103 (Former Exchange/ESD Building), which the USCG claims to be non-historic.
- Demolish the existing Building #123 (Former St. Mary's Unit Chapel [Rod & Gun Club]), which is a contributing structure to The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.
- Construct a new Multi-Mission Building located in the area of the existing Building #103, Building #123, and Building #109 structures.
- Construct a new SAFR in the area of the former Sycamore Circle Housing Units.

We would comment at the outset that the USCG has seemed over the years to be generally unaware of its obligations under the National Historic Preservation Act, leading to its taking no efforts at all to preserve the Sandy Hook Proving Grounds' Chemical Laboratory, one of only two first order buildings in the Landmark District. That building's seriously deteriorated condition supports this conclusion. There appears to be belated recognition of these obligations in Paragraphs X and XI of the Memorandum of Agreement Among the United States Coast Guard, the New Jersey State Historic Preservation Office, and the Advisory Council on Historic Preservation Regarding the Hurricane Sandy Recapitalization Project at Coast Guard Station Sandy Hook, Monmouth County, New Jersey [MOA]. However, the proposal to develop a Communication Plan and Cultural Resources Management Plan [CRMP] moves these obligations out an additional five (5) years, long after the damage done by the present Plan and prior neglect has been accomplished.

Further, although the Draft EA contains a "list of the agencies and persons consulted during EA preparation," there appears to have been no real consultation with non-governmental interested persons. Formal notice requirements may have been complied with, but no efforts appear to have been made to actually contact these organizations. This is particularly egregious with regard to the Sandy Hook Foundation, which has actively supported Sandy Hook and the Parks' activities for so many years; the Fort Hancock 21st Century Advisory Committee, which has been actively working for two years on the development of a reuse plan and on matters relating to future uses of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District; and the Township of Middletown's Landmarks Commission, which was mis-served as the Middletown Township Historic Preservation Commission. The Landmark District lies totally within the Township's boundaries, and while the geographic boundaries are coextensive with the District's, Sandy Hook's "period of significance" for the Township extends several centuries beyond that of the National Landmark.

The National Historic Landmarks Nomination for the Fort Hancock and the Sandy Hook Proving Ground Historic District (Revised November 9, 1982) [Nomination], identifies the Proving ground, the weapon testing area of the Army (1874-1919), as "the most significant

section of the Historic District.” (Item 7, Page 3) That area contains the only first order of significance buildings and structures within the District.

With regard to the “Fort Hancock Buildings”, the Nomination states:

“The post, as it appears today [1982], is composed primarily of these buildings erected at the turn of the century, although some buildings date from the 1920s and 1930s and a larger number remain from the expansion of the post during World War II.” (Item number 7, Page 36)

Most of those WW II buildings, dating from that period when the District had a population of over 10,000, are now gone.

The New Boat Maintenance Facility [BMF]

Although the site and size are mission-dependent, the BMF does not appear to have been designed with the Secretary’s Standards in mind. The following is taken from the Secretary's Standards on Building Site, and is listed under “*Not Recommended*”:

“Introducing a new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships to the site.”

The proposed design contains no elements of design, materials, color and texture which can be related to historic structures within the District. Other architectural options are certainly available to USCG to comply with Secretary’s Standards.

Demolishing the Existing Building #103

From the Draft USCG EA:

Building #103, the Exchange/ESD Building, was built in 1941. This building has been extensively altered and is no longer considered a contributing resource within the Fort Hancock Sandy Hook Proving Ground NHL Historic District.

This building is one of the few survivors of the bustling WW II era when the District contained its largest population by far. To destroy another of those few risks losing any connection to that period, when large numbers of citizen-soldiers passed through on their way to and from the War, many of the latter treated for their wounds at the Post’s Hospital, which is unfortunately also gone.

Demolishing the Existing Building #123

(Former St. Mary’s Unit Chapel [Rod & Gun Club]), which is a contributing structure to The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.

This building is not even identified in the original Public Notice (October 2013), and in the current Public Notice is not identified as a Chapel, as it is in the Landmark Nomination.

From the Nomination:

Unit Chapel - St. Mary's (HS 123) (Rod and Gun Club)

Built in 1901 as a Roman Catholic Chapel and changed in later years to a Unit Chapel. The building was changed or renovated in or about 1946 to a Rod and Gun Club with an enclosed front and rear porch addition. Basic plan is square in shape, 36'-6" by 36'-6" including the enclosure of an open porch in front of the building and a stub 36' by 8' in the rear of the building. Building is a wood frame structure with asbestos siding over wood clapboard exterior. The main building is a stepped up building with wooden barrels about four feet above grade. The west side of the building has a brick footing with a small 10'x 10' dirt floor, basement area. The heating unit is located by the enclosed rear porch. The original portion of [t]he building has a stepped-up stage area with a raised ceiling held up by square wood pillars. The floor is tile on wood subfloor with wood floor beams. This area is used as meeting room. West portion of the building is on brick bearing walls and columns extending to the dirt basement floor. The first or main floor of this area consists of tile on a wood subfloor or wood beams. Windows are double hung wood with two bay windows in the housing quarters. Doors are standard wood exterior type with double wood doors at the main entrance. Roof is hip type with asphalt shingles except where the new addition is located, which has a single slope roof with rolled asphalt shingles. The exterior of the building has no distinctive architectural features or decorative elements. A brick chimney for the oil burner was installed with the new extension on the west side of the building. The building is used as a community center.

From the Draft EA

USCG considered repairing Building #123, which was used as a Recreational Center by the Station. However, the structural integrity of Building #123 was lacking even prior to Hurricane SANDY. The foundation system design suggests that the building was intended to be temporary; it consists of brick piers reinforced with wooden beverage kegs filled with concrete. Hurricane SANDY displaced the building from its primitive foundation system when approximately one foot of water flooded through the structure. Additionally, sink holes around the exterior foundation indicate a compromised foundation and washout of surrounding soils. Following Hurricane SANDY, the interior of the structure has been stripped to the wall studs up to three feet due to water damage from flooding. Due to below freezing temperatures in the winter of 2013/2014 paired with pressed fit pipe connections, a water pipe froze and broke under the structure, again filling the basement of Building #123 with several feet of water. Building #123 cannot be adequately repaired at a reasonable cost due to the extent of interior and exterior damage, and its inadequate foundation system. Additionally, a Recreation Center is no longer needed at Station Sandy Hook since there will no longer be collocated housing units on the site.

This building was certainly not constructed as a temporary structure, although the cement-filled barrels used as piers, possibly a construction technique of the period, are cited to support that claim. The construction date [1912] cited in the USCG's letter of 15 January 2014 to the NJ SHPO is obviously wrong, as there are a number of contemporary references to this building which predate that year.

Reference to rebuilding efforts by the USCG in 1995-1996 raise an issue of whether Section 106 procedures were followed with regard to that work, and why that work on a contributing structure within a Landmark District was not conducted pursuant to the Secretary's Guidelines?

Finally, the USCG's rationalization for the need to demolish the structure seems a bit like the teenager who has murdered his parents pleading for mercy based on the fact that he's now an orphan. There may be no need for a recreation facility within Station Sandy Hook, but a use for the building can certainly be found that will meet the law and regulations on historic preservation.

Constructing a New Multi-Mission Building

The proposed location for this building is in the area of the existing Building #103, Building #123, and Building #109 structures. This construction is a violation of Standard 9, particularly with regard to Chem Lab/Schoolhouse, Bldg. #109, Bldg #102 and the general viewshed for the site. An examination of the plans included in the Draft EA shows the MMB as approximately 75 feet from Bldg. # 109. The MOA states that the USCG may adjust the design of the building to be more compliant and a flat roof is suggested, but this is far from what is required to comply with the Secretary's standards.

Again, reference to the Secretary's Standards on Building Site is appropriate. Under Not Recommended:

Introducing a new building or site feature that is **out of scale or otherwise inappropriate.**

...

Placing parking facilities directly adjacent to historic buildings **where automobiles may** cause damage to the buildings or landscape features or **be intrusive to the building site.**

Introducing a new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships to the site. [emphasis added]

The design of the proposed construction is a textbook example of what not to do. It might in fact be characterized as an "Egads!" design, as reflected in that attached pages on Standard 9 which are from the Secretary's own brochure.

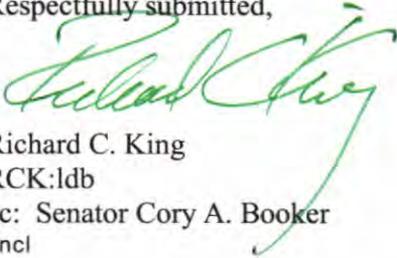
The USCG is capable of better, as the attached photograph of the Sandy Hook Station's own 1992 Engineering Support Facility building illustrates. That building incorporates masonry details and building forms representative of those historic buildings in the District, specifically those of the Proving Ground structures. The 1992 building clearly relates to the District. The proposed designs clearly do not, and one can search in vain within those designs for any detail or form which is representative of those of the historic buildings in the District.

Constructing a New SAFR

Proposed restoration of the site where the present facility is located is to be commended. The new location appears to be suitable, and the size of the facility seems to be dictated by the mission, but the proposed design suffers from the failings discussed above.

This rebuilding work needs to be done, but the manner in which it will be done needs to be readdressed, interested non-governmental parties actually consulted, and the possible re-use of existing structures that will both fulfill the mission and the needs of historic preservation considered.

Respectfully submitted,



Richard C. King

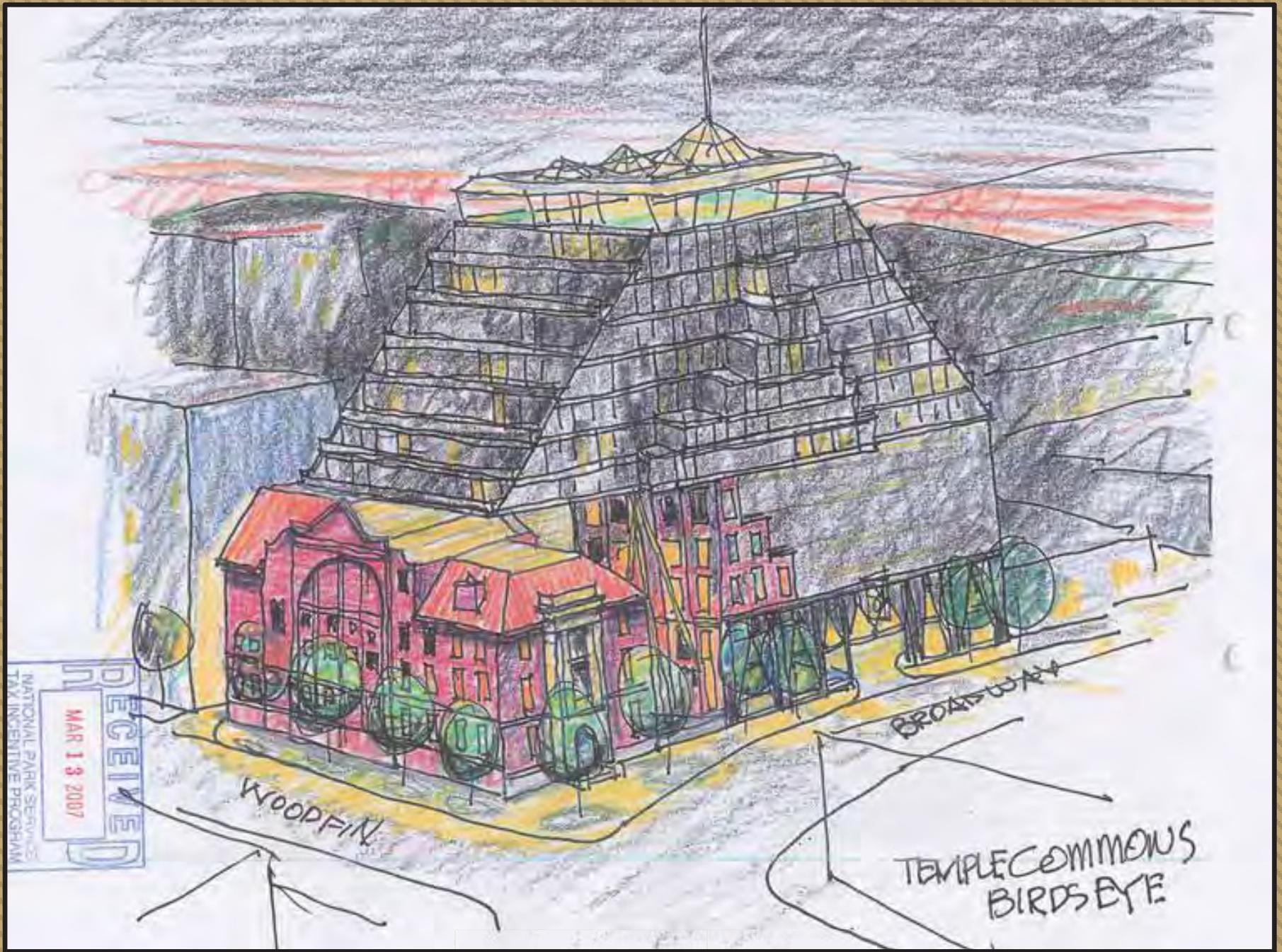
RCK:ldb

cc: Senator Cory A. Booker

encl

STANDARD 9:

New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize a property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.



Egads!



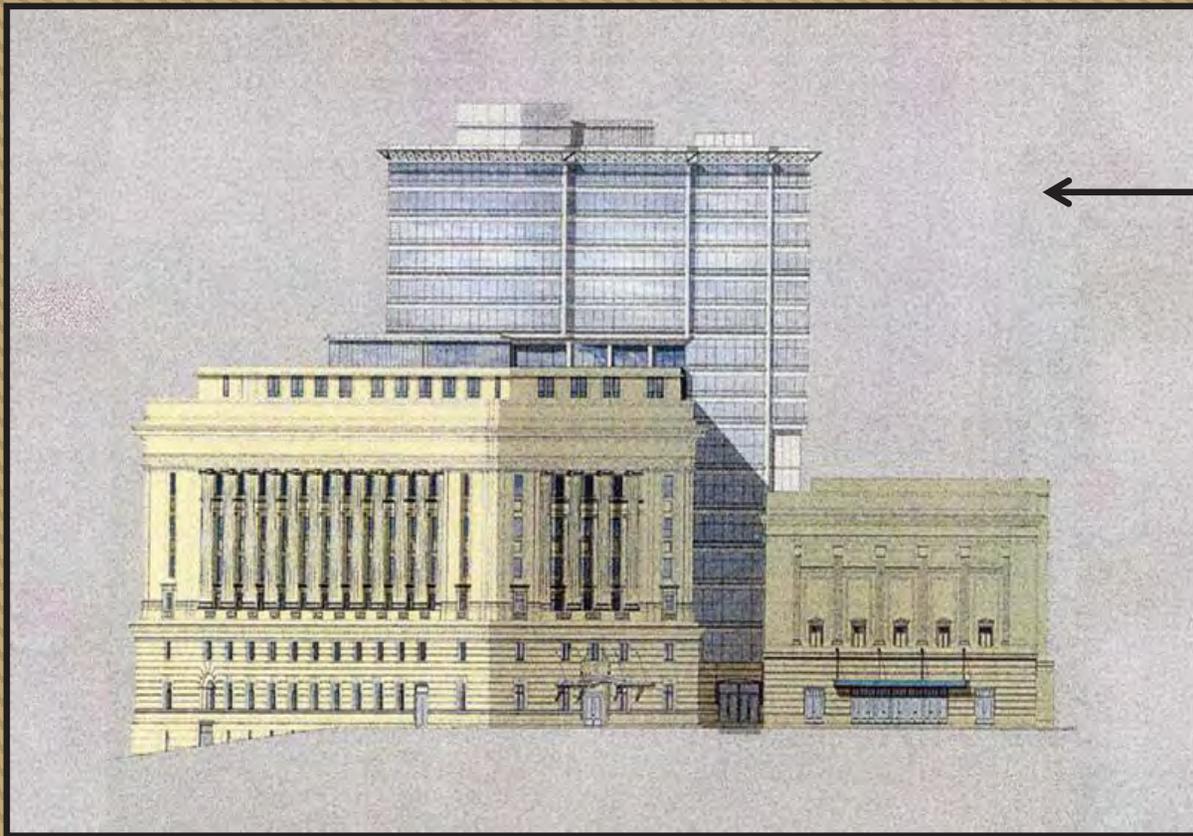
Incompatible Additions





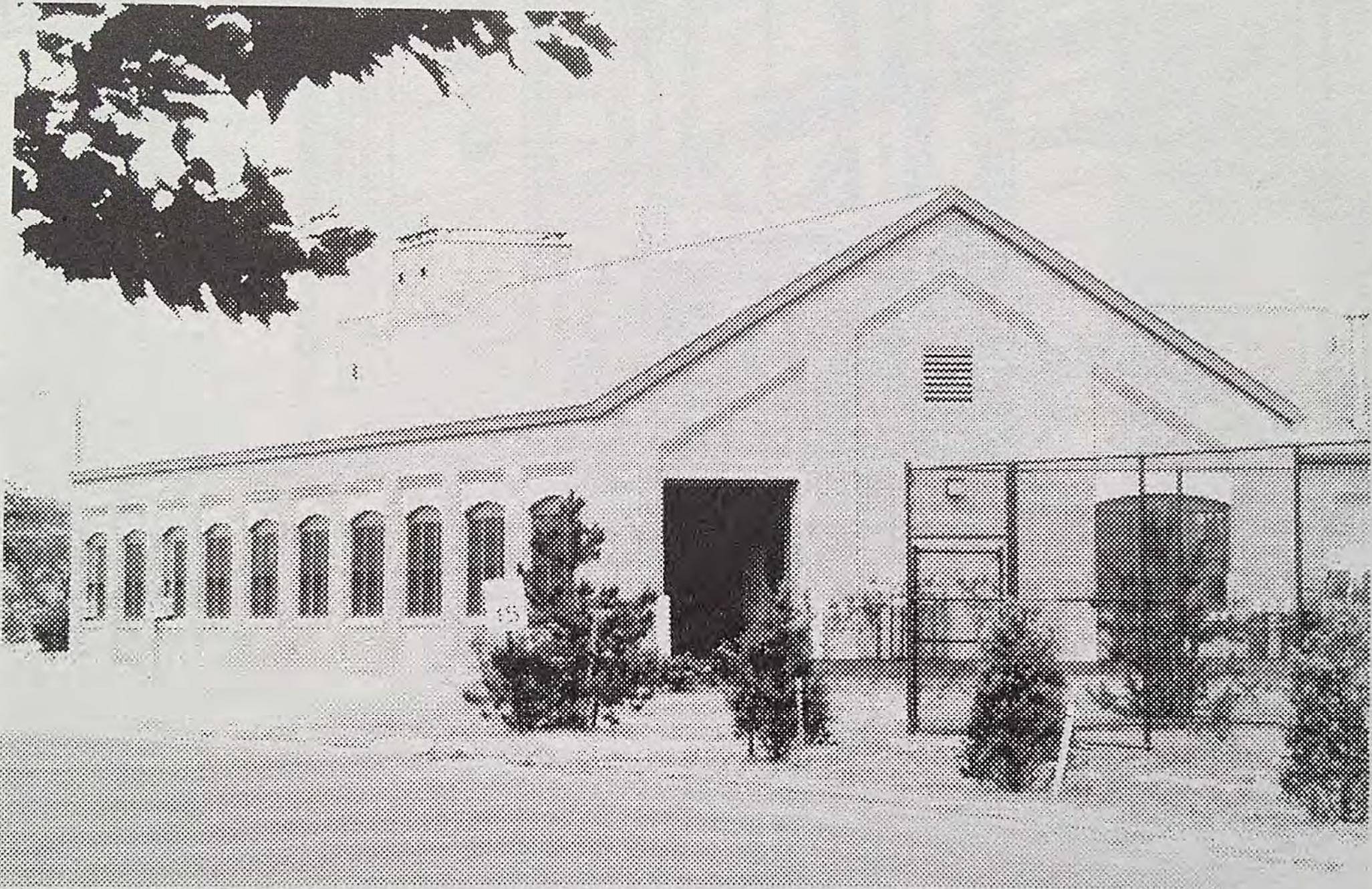
Masonic Temple

RI State Capitol



**Proposed tower
does not meet the
Standards**

**Masonic Temple
Providence, RI**



This new Coast Guard building employs masonry details and building forms found in the historic warehouses.

**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G3: Mr. Richard C. King

Richard C. King
Highlands, NJ 07732

Date of Letter: 29 August 2014

Comment G3-a. Further, although the Draft EA contains a “list of the agencies and persons consulted during EA preparation,” there appears to have been no real consultation with non-governmental interested persons.

USCG Response: Please see USCG response to EA comment G2-g (Army Ground Forces Association). Specifically, as noted in the EA, the Fort Hancock’s 21st Century Advisory Committee and Middletown Township were notified of the USCG’s recapitalization plans in October 2013, and invited to submit comments.

Comment G3-b. Although the site and size are mission-dependent, the BMF does not appear to have been designed with the Secretary’s Standards in mind. The following is taken from the Secretary’s Standards on Building Site, and is listed under “Not Recommended”:

- **“Introducing a new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships to the site.” The proposed design contains no elements of design, materials, color, and texture which can be related to historic structures within the District. Other architectural options are certainly available to USCG to comply with Secretary’s Standards.**

USCG Response: The USCG must meet specific sizing and mission capability requirements with regard to BMF specifications. The BMF must be sized and configured in order to accommodate the USCG’s modern fleet of boats, as well as provide the necessary infrastructure to maintain these boats and Search and Rescue and Law Enforcement missions. An extensive planning effort led to the requirements as identified in the preliminary BMF design. USCG is under mandate to not expand the footprint of its facilities; therefore, the BMF specifications as proposed are precisely what USCG requires and nothing more. Due to the requirement for the BMF to be adjacent to the boat basin, there is only one appropriate location for the proposed new BMF—the same location as the existing non-historic BMF.

In responding to this comment, it is important to understand the Standards in terms of their NPS definition: a series of concepts about maintaining, repairing, and replacing historic materials, as well as designed new additions or making alterations. Associated Guidelines offer general design and technical recommendations to assist in applying the

Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to an historic property (<http://www.nps.gov/tps/standards.htm>).

The comment about the consideration of Standard 9 seems to refer to the destruction of existing historic property, compatibility of the massing, size, scale, and architectural features of the new construction, and overall impact on surrounding property and environment, particularly the NHL district. Each of these items is addressed in the following bullet points.

- Destruction of historic property is caused by the siting of the MMB Building. The siting and size of the MMB is driven by requirements for USCG mission operations and FEMA flood plain elevation requirements. All the USCG land and all buildings at Sandy Hook is land in flood zone V or A (wave surge and inland areas). The distance between the MMB and BMF must be minimal to provide rapid response to critical emergencies. Currently, the distance from the building housing the MMB function (CG-1) and the BMF is 1,971 feet, which is unacceptable in terms of USCG response standards. The BMF must be visible from the MMB for required 24-hour Command Center function. This also means that the MMB must be built in a Zone V wave surge area, requiring the 19 foot elevation.
- As noted above, the massing, size, and scale of the BMF, MMB, and SAFR buildings are driven by the architectural program requirements. The BMF's large size is a function of the increase in boat size, in comparison to the existing BMF facility which was constructed in the 1970s, and the need to house and maintain these boats in a location that is closer to the New York City harbor area than their current location at Bayonne, New Jersey. Importantly, the Coast Guard considered the possibility of relocating some of the classroom functions out of the MMB and into unused historic buildings. The USCG Facilities Design and Construction Center evaluated nearby historic buildings and brought in a historic architect to review this possibility. Relocating classroom functions out of the MMB had to be ruled out because these buildings do not meet updated floodplain and proximity requirements. In addition, they contain flaking lead paint, asbestos, and they have no utilities. Installation of needed utilities would cause ground disturbance and potentially require archaeological investigations. The Coast Guard took steps to minimize the lateral footprint of the MMB to avoid archaeological sites and existing geothermal wells that allow the structure to achieve Leadership in Energy & Environmental Design (LEED) certification. The total square footage of the new MMB has been reduced, with the lateral footprint of the new MMB about half that of the existing MMB.
- The USCG acknowledges that the three new buildings at the station are not consistent with the average massing, size, and scale of the historic buildings in the NHL. However, these new buildings have been designed to meet USCG mission standards and must accommodate current-scale equipment, operational practices,

and recent flooding requirements. Although this does not result in buildings that are fully consistent with Standard Number 9, the use of certain architectural elements on these buildings is an attempt to comply with the spirit of the standard. As described in the EA, revisions of initial architectural design included a decrease the sense of massiveness through greater articulation of wall planes, specifically through use of vertical supports to define bays, rather than creating monolithic expanses, as was done with the revised SAFR design. The revised BMF design incorporated monitor level windows, to cap the vertical walls, and decrease the sense of building mass. These two elements – articulated vertical division of bays, and monitor windows – specifically reference architectural elements found on Existing Engineering Building S503 in the NHL district. Other design modifications include changing all exterior perpendicular stairs to parallel switchback stairs, and adjusting MMB sill and lintel dimensions to be proportional with those on historic buildings. In addition, the MOA stipulates an effort to continue refinement of the MMB roof pitch prior to construction. The greater articulation of space, dis-integration of wall planes, and improving the proportion of architectural features to be more consistent with those found on existing buildings, resulted in these new buildings being more compatible with the historic district and surrounding environment.

Comment G3-c. Demolishing the Existing Building #103
Building #103, the Exchange/ESD Building, was built in 1941. This building has been extensively altered and is no longer considered a contributing resource within the Fort Hancock Sandy Hook Proving Ground NHL Historic District. This building is one of the few survivors of the bustling WW II era when the District contained its largest population by far. To destroy another of those few risks losing any connection to that period, when large numbers of citizen-soldiers passed through on their way to and from the War, many of the latter treated for their wounds at the Post's Hospital, which is unfortunately also gone.

USCG Response: Please see the detailed USCG response to comment G1-f (Township of Middletown) regarding reuse potential for Building #103 and NJ HPO concurrence with the USCG determination that this structure is not contributing to the historic district as it no longer retains any of its original design components beyond the wood framing and sheathing.

Comment G3-d. Demolishing the Existing Building #123
(Former St. Mary's Unit Chapel [Rod & Gun Club]), which is a contributing structure to The Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District.

This building is not even identified in the original Public Notice (October 2013), and in the current Public Notice is not identified as a Chapel, as it is in the Landmark Nomination.

This building was certainly not constructed as a temporary structure, although the cement-filled barrels used as piers, possibly a construction technique of the period, are cited to support that claim. The construction date [1912] cited in the USCG's letter of 15 January 2014 to the NJ SHPO is obviously wrong, as there are a number of contemporary references to this building which predate that year.

Reference to rebuilding efforts by the USCG in 1995-1996 raise an issue of whether Section 106 procedures were followed with regard to that work, and why that work on a contributing structure within a Landmark District was not conducted pursuant to the Secretary's Guidelines?

There may be no need for a recreation facility within Station Sandy Hook, but a use for the building can certainly be found that will meet the law and regulations on historic preservation.

USCG Response: Building #123 was not identified in the October 2013 Public Notice because at that time planning for the recapitalization efforts was still taking shape, and the optimal location and size requirements of the new BMF and MMB were still being developed. Appendix C of the EA contains the USCG addendum to the Section 106 consultation with NJ HPO in January 2014, when it was evident that Building #123 was in close proximity to the proposed new MMB location. NPS was also notified of the proposed demolition of Building #123 in March 2014. Building #123 is referred to as the former USCG Recreational Center, which was its function prior to sustaining damage from Hurricane SANDY. USCG is aware of the history of this structure; it was initially built in 1901 as a Roman Catholic Chapel and changed in later years to a Unit Chapel. The building was changed or renovated in or about 1946 to a Rod and Gun Club with an enclosed front and rear porch addition. Later the structure was used as a Recreational Building and community center for the USCG Station.

A historic property survey study of USCG property was completed in the 1980s by John Milner & Associates. They investigated the history of Building #123, but listed its construction date as 1912 versus 1901. The date of the building has been updated in the Final EA accordingly.

In the mid 1990s, USCG performed extensive exterior (1994) and interior (1995) rehabilitation of Building #123, and received concurrence from NJ HPO for both rehabilitation projects meeting the Secretary of Interior's standard. In fact, this was one reason why NJ HPO maintained their current determination that the structure was still a contributing element to the historic district, since it no longer retains any of its original building components beyond some of the wood framing (some original wood framing was also replaced in the mid-1990s due to extensive damage and undersized members).

Due to the fact that the structure lies well within the floodplain, damage from Hurricane SANDY moved the structure off its foundation and scoured the surrounding soils. In order to be structurally sound the entire building, which no longer retains any of its original components, would need to be rebuilt. USCG is not authorized to spend

Hurricane SANDY recapitalization funding on this non-mission critical structure within the flood plain. Please see the detailed USCG response to comment G1-f (Township of Middletown) for further information regarding reuse potential for Building #103.

Comment G3-e. Constructing a New Multi-Mission Building

The proposed location for this building is in the area of the existing Building #103, Building #123, and Building #109 structures. This construction is a violation of Standard 9, particularly with regard to Chem Lab/Schoolhouse, Bldg. #109, Bldg #102 and the general viewshed for the site.

USCG Response: Please see the detailed USCG response to comment G1-a, G1-c, and G1-e (Township of Middletown) regarding proposed construction of the new MMB.

Comment G3-f. Again, reference to the Secretary's Standards on Building Site is appropriate. Under *Not Recommended*:

- **Introducing a new building or site feature that is out of scale or otherwise inappropriate.**
- **Placing parking facilities directly adjacent to historic buildings where automobiles may cause damage to the buildings or landscape features or be intrusive to the building site. Introducing a new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships to the site. [emphasis added] The design of the proposed construction is a textbook example of what not to do.**

USCG Response: Please see the detailed USCG response to comment G1-c, G1-d, and G1-e (Township of Middletown) regarding proposed construction of the new MMB.

Comment G3-g. Constructing a New SAFR

Proposed restoration of the site where the present facility is located is to be commended. The new location appears to be suitable, and the size of the facility seems to be dictated by the mission, but the proposed design suffers from the failings discussed above.

USCG Response: One of the design features incorporated into the new SAFR building is the delineation of vertical bays, which is consistent with the existing Engineering Building #S503, a historic industrial building with vertical pier and spandrel design. In addition, different heights and fenestration articulate separate functional areas, and a glass panel bay provides an appropriately-scaled entrance for this new building. The use of different colored brick and light beige surrounds, including a string course articulating the upper level of the actual firing range, help reduce the massiveness of what is essentially a large rectangular box. These are not required structural or functional features, and have been incorporated into the building design to ensure that the exterior design reflects some basic architectural elements evidenced by historic buildings in the district.

To: Lynn Keller, USCG Project Manager
From: Former Employees, NPS Sandy Hook
Date: August 29, 2014

To Whom It May Concern:

We are former National Park Rangers of Sandy Hook, and as such, remain deeply committed to the NPS mandate “to conserve the scenery [of all national parks] and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

Upon reviewing the draft Environmental Assessment for the Recapitalization Project at USCG Station Sandy Hook, dated August 2014, we believe the Proposed Action will have an adverse impact on the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District that far exceeds its benefits, and feel compelled to share our perspective.

Our primary concerns lie in the destruction of three elements we feel contribute strongly to the integrity of Fort Hancock NHL: Building 123, known historically as St. Mary’s Chapel; Building 103, one of the last remaining World War II wooden structures on site; and a historic landscape.

First, the former St. Mary’s Chapel (Building 123) dates to 1901, and was a focal point for Catholics living and working at Sandy Hook well into the 1960s. Soldiers and their families flocked here to celebrate life’s greatest moments, and to seek guidance at its worst. This building represents the successful efforts of Rev. Richard T. Ryan and the Diocese of Trenton to provide soldiers and their families at Fort Hancock with the spiritual and community support typical of small-town America. USCG and NJ SHPO have already acknowledged the historical significance of this structure. Since the USCG draft EA indicates this building may be within a staging area needed for construction, but not in the footprint of proposed construction itself, we ask that St. Mary’s be spared from demolition; otherwise, the story of Fort Hancock and the Sandy Hook Proving Ground is greatly diminished.

Next, we believe that Building 103 retains many of its exterior character-defining features, and significantly contributes to the story of Fort Hancock during World War II, one of the most important periods in its history. As war neared, white wooden buildings like 103 were constructed en masse on military bases across the country. At that time, Fort Hancock served as both a staging area for troops departing for Europe and a coast defense installation. As the number of soldiers on site swelled to over 10,000, around 200 of these buildings were constructed for a variety of purposes, including as barracks and warehouses, and even a post office and theater. Most of Fort Hancock’s WWII structures were demolished in two phases, one in the 1960s, and another in the early 1990s. Today, only a handful of these increasingly rare WWII artifacts remain standing within the NHL boundary, and none are identical in style to 103.

We assert that per National Register guidance, Building 103 is historically significant, as it is “associated with events that have made a significant contribution to the broad patterns of our history,” and “embod[ies] the distinctive characteristics of a type, period, or method of construction.” By saving the few surviving wooden WWII buildings at Fort Hancock, the important story of how these structures were purposefully designed and built to successfully mobilize a nation can still be told.

Finally, NPS Fort Hancock Rehabilitation Guidelines state that for new construction, a “compatible design will respect the existing materials, scale of building...the prevalent height and proportions of the buildings offer an obvious palette of materials and forms for new design.” (For example, the style of USCG Station Sandy Hook’s modern Engineering Support Facility.) We believe the proposed Multi-Mission Building is incompatible with these requirements and the existing landscape. Furthermore, the oversized MMB will obscure iconic vistas of Sandy Hook Bay. We believe this will have an overall adverse impact on Fort Hancock NHL, which has remained largely unchanged for over a century. Therefore, we request that USCG reconsider the proposed MMB’s impact on the appearance of Fort Hancock, and amend its design, location, and footprint to be more appropriate for this National Historic Landmark.

In our experiences with the visiting public, the fabric of Fort Hancock conveys a feeling greater than the sum of its parts. To us, Fort Hancock’s greatest cultural resource is the collective nature of the NHL—each building, no matter its condition, is a vital part of the story. Perhaps most remarkable is that so much remains intact, appearing much as it did 70 or even 100 years ago.

We recognize the Coast Guard’s need for modern, storm-resistant facilities in order to fulfill its mission. However, we implore the Coast Guard to develop these new facilities in a way that does not demolish or endanger, but embraces and preserves, the rich history of this national park we love.

Sincerely,



Charles J. Gutch



Brian Malley



Maren Morsch



Michael Mason



Lawrence R. Winchell IV



Thomas P. Minton



Bonnie Brookes



Samantha Mass



Brian Kempf



Timothy E. Regan



Rebecca Bouchard



Alexander Krstevski

**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G4: Former NPS Employees

Former NPS Employees, NPS Sandy Hook
Fort.hancock.nj@gmail.com

Date of Letter: 29 August 2014

Comment G4-a. First, the former St. Mary's Chapel (Building 123) dates to 1901, and was a focal point for Catholics living and working at Sandy Hook well into the 1960s. ...Since the USCG draft EA indicates this building may be within a staging area needed for construction, but not in the footprint of proposed construction itself, we ask that St. Mary's be spared from demolition; otherwise, the story of Fort Hancock and the Sandy Hook Proving Ground is greatly diminished.

USCG Response: The construction date of this building, which began its history as the First Methodist-Episcopal Church, has been updated in the Final EA. This structure was significantly damaged by Hurricane SANDY and is beyond repair; additionally, none of its original design components are present beyond some of its wood framing. Due to extensive damage sustained by this structure during Hurricane SANDY, unavailability of funding to completely rebuild it, and its present threat as a safety hazard, USCG has determined that the best course of action at this time is to properly complete HABS recordation of the structure to NJ HPO and NPS standards, and demolish the structure. Please see the detailed USCG response to comments G1-f (Township of Middletown) and G3-d (Richard C. King) regarding proposed reuse and demolition mitigation for Building #123.

Comment G4-b. Next, we believe that Building 103 retains many of its exterior character-defining features, and significantly contributes to the story of Fort Hancock during World War II, one of the most important periods in its history.

USCG Response: Please see the detailed USCG response to comments G1-f (Township of Middletown) and G2-a (Army Ground Forces Association).

Comment G4-c. Finally, NFS Fort Hancock Rehabilitation Guidelines state that for new construction, a "compatible design will respect the existing materials, scale of building ...the prevalent height and proportions of the buildings offer an obvious palette of materials and forms for new design."... We believe the proposed Multi-Mission Building is incompatible with these requirements and the existing landscape. Furthermore, the oversized MMB will obscure iconic vistas of Sandy Hook Bay. We believe this will have an overall adverse impact on Fort Hancock NHL, which has remained largely unchanged for over a century. Therefore, we request that USCG reconsider the proposed MMB's impact on the appearance of

Fort Hancock, and amend its design, location, and footprint to be more appropriate for this National Historic Landmark.

USCG Response: Please see the detailed USCG response to comments G1-b, G1-c, G1-d, and G1-e (Township of Middletown) and G2-a (Army Ground Forces Association).

August 30, 2014

Lynn Keller, EI, PMP
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612
510-637-5513 (fax)
Lynn.M.Keller@uscg.mil

Regarding: Draft EA "Rebuild USCG Station Sandy Hook, New Jersey

Dear Ms. Keller,

The purpose of this letter is to add my name to the numerous voices that have raised concern over the handling and design of the proposed work at the USCG Station Sandy Hook, NJ. I write not in my present capacity as CEO of one of New Jersey's oldest and largest architectural firms. I write in my former capacity as the architect for the Redevelopment of Fort Hancock whose RFP was won, subsequently developed and formally presented to the National Park Service and Department of Interior over the course of ten years from the late 1990's to 2008 when it sadly did not move forward. I worked carefully and closely with every federal, state and local agency whose jurisdiction was appropriate as well as many that weren't. The thousands of copyrighted documents, concepts, images and detailed designs that were produced remain appropriate even now and hopefully still to future use should the situation arise. But, their importance here is to their rigorous attention to the historic, cultural and architectural design influences of this country's coastal defense and engineering development presence at Sandy Hook that stand in stark contrast to the design currently submitted.

It is said in my profession that to produce a good building takes a good client. I know and have teamed with the firm that designed the present submission. They are a strong, capable and respected design firm so, we know that this is not some featureless enclosure of their own direction. We also know it is not about funding as the concepts, materials and elements that would bring the work to a position more respectful of the rich heritage that precedes it are relatively straightforward and would not cause major budgetary concern. So, it leaves the question as to why any agency, division or department of the US Government would intentionally want to differentiate themselves in a negative way from the extensive and so highly visible examples of good architecture that are adjacent to them? What purpose is served? The structure currently submitted is not only indifferent to the rich context of Sandy Hook but, gives every appearance that it could be built anywhere.

We know from the structures of Fort Hancock (all of Sandy Hook) that when built and maintained properly the results of our work remain longer than we do. These are decisions affecting not only the present but, many generations to come. Why should the citizens of this country, state and region accept less than the smart and well-intended people chosen to make the same decisions were able to execute well over one hundred years ago? It is absurd to consider that with all the advances in technology, materials, design and construction of the last one hundred years that we are unable to produce structures even reasonably respectful, much less materially equal to those that have come before. It is also insulting to the millions of annual park visitors, guests and users of this country's facilities that we cannot or, choose not to do better.

We *can* do better and we know it. I respectfully submit that these concepts deserve a redesign; one that takes into consideration the history, culture, integrity and vocabulary of the existing conditions. This includes everything that is so fundamental to architecture: siting, visibility, view corridors, orientation, energy conservation / sustainability, scale, proportion, context, aesthetics and the list goes on. The process by which this should take place I leave to others.

My long career has been spent focusing on each and every project maximizing its opportunities knowing that its presence is likely to outlast my own. Ten of those years were spent focused on this for the structures that grace this beautiful and environmentally rich peninsula we call Sandy Hook. Every endeavor is an opportunity to positively reinforce the underlying and tangible design principles of the existing condition. Conversely, to ignore them negatively reinforces future efforts that connecting to the contextual fabric is not important or necessary. It only takes one link in the chain to break it. The opportunity to develop solutions that future generations will respect and continue the legacy rests with those of decision-making capability today.....the client. I respectfully implore you, Ms. Keller to rethink the objectives and potential (both positive & negative) of this effort and revisit the task with the purpose of executing a solution more contextual, inspired and influential not only to present generations but, to those equally-deserving yet to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'BKellner', with a long horizontal stroke extending to the right.

Robert Kellner, AIA, NCARB
40 Seaview Terrace
Monmouth Hills
Highlands, NJ 07732
b_kellner@comcast.net

**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G5: Mr. Robert Kellner

Bob Kellner, AIA NCARB
b_kellner@comcast.net

Date of Letter: 30 August 2014

Comment G5-a. I respectfully submit that these concepts deserve a redesign; one that takes into consideration the history, culture, integrity and vocabulary of the existing conditions. This includes everything that is so fundamental to architecture: siting, visibility, view corridors, orientation, energy conservation / sustainability, scale, proportion, context, aesthetics and the list goes on.

USCG Response: To clarify, the exterior architectural renderings of the proposed new structures at Station Sandy Hook included in Appendix A of the EA are preliminary design drawings, on which the design-build contract compete is based. Detailed designs have yet to be developed for the structures, but mission requirements, location, and spacing needs have been identified. Congressional funding stipulations for Hurricane SANDY recapitalization work require USCG to award a design-build contract for the reconstruction by 30 September, or funds will expire and the severely compromised USCG Search and Rescue and Law Enforcement functions at Station Sandy Hook will remain compromised. Since the contract is for a design-build, the preliminary design drawings serve as performance and prescriptive specifications for the proposed construction. USCC has executed an MOA with NJ HPO and ACHP in support of this recapitalization work, and has identified several mitigation measures and continuing consultation with NJ HPO, ACHP and NPS as the design of the structures is further developed. Certain design elements are incapable of being altered however due to congressional funding stipulations and mission requirements, such as the height of the structure to meet floodplain requirements and the location of the structure near the BMF and waterfront. Please see the detailed USCG response to comments in letter G1 (Township of Middletown) and G2 (Army Ground Forces Association).

The Sandy Hook
Foundation



Friends of the National
Park Service at Sandy Hook

The Sandy Hook Foundation, Inc

August 30, 2014

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1301 Clay Street, Suite 700N
Oakland, CA 94612
Lynn.M.Keller@uscg.mil

Re: Draft Environmental Assessment
Hurricane Sandy Proposed Recapitalization Project
Rebuild USCG Station Sandy Hook, New Jersey

Dear Ms. Keller:

On behalf of The Sandy Hook Foundation (SHF), I apologize for this last minute submittal to respond to your public notice; we were unaware we were named a recipient of such a notice until last week. To our knowledge, we never received any correspondence relating to this project.

SHF is the official volunteer friends group to the Sandy Hook Unit of the Gateway National Recreation Area - we have been incorporated as a 501-c-3 since 1989. We work closely with other volunteer and agency groups within the park and often collaborate on projects benefitting nearly 2.2 million annual visitors to Sandy Hook. All of us are well aware of Section 106 of the National Historic Preservation Act and that the whole of Sandy Hook is in fact the Fort Hancock Sandy Hook Proving Ground National Historic Landmark., Whether rehabilitating the Lighthouse Keeper's Quarters adjacent to America's oldest standing lighthouse (1764), adaptively reusing existing landmarks for educational and research use, preserving NIKE missile launch and radar sites, restoring mortar and gun batteries, attending the Federal Advisory Committee meetings to follow their mission to rehabilitate 35 architecturally valuable properties... to writing grant

proposals to save every vestige of history within this historic landscape, we are always mindful of preservation.

We are therefore, baffled and exasperated by the Coast Guard's lack of sensitivity to Sandy Hook's landmark title. The plan as written fails to reuse a single historic structure, proposes to demolish two, one a first order landmark building, and the rest remain vacant and unused.

We recognize the time constraints to receive funding but ask that you consider the impact of the proposed project - its adverse impact on the surrounding landscape. Further, we ask that the Coast Guard seek Congressional approval for an extension, immediately. Engage the Sandy Hook community of partners, volunteers, educators, preservationists and students to help contact our congressmen and women to secure an extension of fiscal obligation authority so a viable plan that reuses the historic buildings can be developed and implemented to meet USCG mission needs.

We understand the importance of a modern, fully-capable USCG Station on Sandy Hook; please rebuild with an appreciation and acknowledgement of its historic significance and maximum use of the historic buildings to truly honor our Nation's vibrant history.

Sincerely,

Betsy Barrett

Elizabeth H. Barrett, President
The Sandy Hook Foundation

Tax ID: 22-1994056

84 Mercer Road Fort Hancock, NJ 07732 732-291-7733 ph 732-291-2665 fx
shfinc@monmouth.com www.sandyhookfoundation.org

USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project

Letter G6: Sandy Hook Foundation

The Sandy Hook Foundation
c/o Betsy Barrett
84 Mercer Road
Fort Hancock, NJ 07732
shfinc@monmouth.com

Date of Letter: 30 August 2014

Comment G6-a. On behalf of The Sandy Hook Foundation (SHF), I apologize for this last minute submittal to respond to your public notice; we were unaware we were named a recipient of such a notice until last week.

USCG Response: The Coast Guard notified the Sandy Hook Foundation of the proposed undertaking in October 2013. Please see attached notification letter entitled *Notification of Proposed Undertaking – Hurricane Sandy Recapitalization Project for USCG Station Sandy Hook, Monmouth County, New Jersey* from USCG to the Sandy Hook Foundation signed by John Poland of USCG on 17 October 2013 and sent to the attention of Betsy Barrett, President, Sandy Hook Foundation, Lighthouse Keeper's Quarters, 84 Mercer Road, Fort Hancock, NJ 07732.

The Coast Guard also requested input from the public on the issues to be addressed in the EA by publishing a public notice on October 6, 2013, in the Asbury Park Press (Appendix F in the EA). The notice described the Proposed Action and invited the public to submit comments to the Coast Guard by October 20, 2013. No comments were received.

The Coast Guard notified the public of the availability of the draft EA through publication of a notice on August 17, 2014, in the Asbury Park Press (Appendix F). The draft EA was available for public review online at <http://www.uscg.mil/d5/PublicNotices.asp> or in hard copy at the Middletown Township Public Library. The 15-day comment period concluded on August 30, 2014

Comment G6-b. We recognize the time constraints to receive funding but ask that you reconsider the impact of the proposed project and its adverse impact on the surrounding landscape. Further, we ask that the Coast Guard seek Congressional approval for an extension, immediately. Please engage the Sandy Hook community of partners, volunteers, educators, preservationists and students to help contact our Congressmen and women.

USCG Response: Please see the detailed USCG response to comment G2-g (Army Ground Forces Association).

U.S. Department of
Homeland Security

United States
Coast Guard



Commanding Officer
United States Coast Guard
Shore Infrastructure Logistics Center

300 East Main Street, Suite 800
Norfolk, VA 23510-9104
Staff Symbol: EMD
Phone: (757) 628-4168
Email: James.M.Lewis@uscg.mil

5090

Betsy Barrett
President
Sandy Hook Foundation
Lighthouse Keeper's Quarters
84 Mercer Road
Fort Hancock, NJ 07732

Subj: Notification of Proposed Undertaking – Hurricane Sandy Recapitalization Project for
USCG Station Sandy Hook, Monmouth County, New Jersey

Dear Ms. Barrett:

The 2013 Disaster Assistance Supplemental Act (P.L. 113-2) appropriated funds to rebuild U.S. Coast Guard (USCG) shore facilities damaged by Hurricane Sandy in October 2012. To prevent damage from future storms, the projects would replace damaged facilities with those that are hurricane and flood resilient. One of the projects would be located at Coast Guard Station Sandy Hook, located in Middletown Township, Monmouth County.

The project is subject to Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) which provides you the opportunity to comment on the project's effects on historic properties. As your organization has been identified as a public entity that likely has interest in the effects of this undertaking on historic properties, USCG, in consultation with the State Historic Preservation Officer, is informing you of the opportunity to provide comments.

Below please find a summary regarding the proposed undertaking at Coast Guard Station Sandy Hook. A map showing the location of the station is enclosed.

Proposed Action: The USCG proposes to repair and rebuild structures at the waterfront at USCG Station Sandy Hook, including repairs or replacement of the wharf, piers, breakwaters, floating docks, groin, utilities, and boat ramp to return them to pre-Hurricane Sandy conditions. The boat basin will also be dredged. The existing non-historic Multi-Mission Station Building (MMB) will be demolished and a new storm-resistant MMB will be constructed. A new Boat Maintenance Facility (BMF) will be constructed and the existing non-historic BMF will be demolished. The existing Small Arms Firing Range (SAFR) will be

SUBJ: USCG STATION SANDY HOOK, MONMOUTH COUNTY, NEW JERSEY

demolished and a new indoor SAFR constructed. The new SAFR will include space for administrative functions, classroom space, toilet/shower rooms, virtual range, ammunition/weapon storage, and facility support spaces. It will serve all USCG units located in the Sector New York Area of Operations (AOR) and will have the capacity to serve operational partners. Damaged non-historic housing units may also be demolished. Building 103 (Exchange/ESD) is also proposed for demolition to allow room for new construction. USCG will consult with the State Historic Preservation Officer to avoid and/or mitigate adverse effects on historic properties at the site. The Proposed Action includes options to construct additional housing and a combined Exchange and Community Center.

USCG hereby extends the invitation to the Sandy Hook Foundation to provide comments regarding the effect of this undertaking on historic properties. If you have any further questions, please contact Mr. Jim Lewis of my staff at (757) 628-4168.

POLAND.
JOHN.
R.1049774717

A red digital signature scribble is positioned over the text 'JOHN.' and 'R.1049774717'.

Digitally signed by POLAND.
JOHN.R.1049774717
DN: c=US, o=U.S. Government,
ou=DoD, ou=PKI, ou=USCG,
cn=POLAND.JOHN.R.1049774717
Date: 2013.10.17 11:59:41 -0400

John Poland
USCG SILC
Environmental Management Division Chief
By Direction

Enclosure: (1) USGS Topographic Map of USCG Station Sandy Hook

Copy: CG SILC
CG CEU Providence
NJ SHPO



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
United States Custom House
200 Chestnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

1.D (NER-RS)

AUG 28 2014

Lynn Keller
Project Manager
USCG SILF EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612

Subject: Notice of Availability of the Draft Environmental Assessment, Hurricane Sandy Proposed Recapitalization Project to Rebuild USCG Station Sandy Hook, New Jersey

Dear Ms. Keller:

The National Park Service appreciates the opportunity to provide comments on the draft Environmental Assessment (EA) for the Proposed Recapitalization Project to Rebuild USCG Station Sandy Hook, New Jersey. The comments below represent the views of Gateway National Recreation Area, the Northeast Region National Historic Landmark program, and the Northeast Region Resource Planning and Compliance program.

In October 2012, Hurricane Sandy caused significant amounts of damage to the New York Harbor area, including the Sandy Hook peninsula. The US Coast Guard proposes to replace three of its primary facilities on Station Sandy Hook damaged by the storm and includes the demolition of a number of structures, including one historic building. The siting of the new Multi-Mission Building (MMB), in particular, responds to concerns about resiliency and resistance to future floods and storms. The National Park Service recognizes these challenges, as it faces the same requirements and concerns at Gateway National Recreation Area.

The US Coast Guard and the National Park Service each maintain a portion of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District; a National Historic Landmark (NHL) is the highest level of federal recognition afforded to historic properties. The District's significance is based on its role in the defense of New York Harbor for more than 200 years, as well as its contributions to artillery and radar technology. Gateway's iconic Officers' Row, directly south of Station Sandy Hook, is famous for its beauty and views. The peninsula is also home to significant natural resources, such as the rare Maritime Holly Forest environment, and rare and endangered birds.

As described in the EA, the new MMB will be within 200 feet of the boundary with the park, placing it in close proximity to several park housing structures and numerous historic properties. Further, the only land-based access to Station Sandy Hook goes directly through the sensitive ecosystems and historic resources mentioned above, as well as the popular recreational areas for which the park was established. However, the EA contains no discussion of impacts to resources within Gateway National Recreation Area. The NPS is particularly concerned with the fact that the EA does not discuss and disclose the potentially severe adverse impacts that the construction

of these facilities would likely have as a result of the visual intrusion into the viewsheds and setting of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District, the majority of which is located immediately adjacent to the boundary of Station Sandy Hook within Gateway's legislated boundary. Detailed comments are found below.

Specific comments

Page 1

- The proper name of Gateway is Gateway National Recreation Area (see third paragraph). It would also be more accurate to state this as "The entire Sandy Hook peninsula lies within the legislative boundaries of the National Park Service (NPS) Gateway National Recreational Area."

Page 2

- 3rd bullet – Recommend revising "and is designated as a historic site" to "and is a contributing structure to a National Historic Landmark district."

Page 3

- Proposed action - The proposal to demolish 22 non-historic Borough Housing Units could be of significant advantage for Gateway NRA natural resources management goals and Coast Guard vegetation management, if the Coast Guard would restore a native forest community on that former housing site. The new (April 2014) General Management Plan for Gateway NRA identified the American Holly Forest (*Ilex opaca*) as a fundamental resource on the Sandy Hook peninsula. The present trend of sea level rise and increased frequency of severe coastal storms is destroying portions of the historic 101-acre Maritime Holly Forest. Ecological succession, however, is shifting the holly forest northward and eastward onto higher elevations of the peninsula. Early seral stages of vegetation in the backdunes are naturally replaced with Successional Maritime Forest and Maritime Holly Forest. The Coast Guard can contribute to this maritime forest preservation in an ever-changing environment by restoring the Borough Housing site to shrublands and forest. This will provide habitat for American Holly trees and for the migratory birds and other wildlife that depend on these plants for cover and food. Reforestation on this site with native woody plants also will retard the invasion by non-native Asian Sand Sedge (*Carex kobomugi*) which now covers more than 54 acres of the Sandy Hook peninsula, including a monoculture in the north side of the Coast Guard property. Control of invasive non-native species is also consistent with Federal Executive Order 13112 and New Jersey Executive Order 97.

Page 4

- 1st paragraph in Section 3.3 – it would be more accurate in the last sentence to say "There are no other acceptable locations within Station Sandy Hook that meet time critical deployment distances for responses to distress calls." There might actually be better locations within the NHL district, but they would be on NPS land.

Page 5

- 2nd paragraph – It is unclear why placing the MMB and Boat Maintenance Facility (BMF) “in extremely close proximity to each other” and presenting “a huge building mass on the waterfront” are negatives. One possible reading is that there was concern about visual impacts to the NHL district; however, visual impacts are not discussed in the impact analysis, which would make this reasoning inconsistent. Recommend adding a phrase or sentence to explain why these are issues.
- 3rd paragraph – it is unclear that these are the best “higher ground” locations without the inclusion of an elevation/floodplain map for reference.
- 4th paragraph – Recommend revision of “is designated as a historical site” to “is a contributing structure to the NHL district”.
- 4th paragraph – this states that the Small Arms Firing Range (SAFR) was sited to avoid “proximity to historic structures.” As written, it is unclear why the same standard was not applied to the site of the MMB. Recommend adding clarification as to this point.

Page 11

- Noise – The EA does not analyze the impacts of noise within Gateway National Recreation Area. Noise impacts to the park are reasonably foreseeable, since the demolition of buildings 123 and 103 and the construction site of the MMB are adjacent to the boundary between the Station and the park, and there are park housing units on the other side of Hartshorne Drive (buildings 102, 104, 108, 119, and 120) that could also be affected by noise and vibrations. There may also be effects to park visitors from noise from pile-driving; the heaviest tourist season runs from Memorial Day to Labor Day.

Page 12

- Section 4.3 - Please also include an assessment of the impacts of any changes in lighting from the project. The night environment is important for many activities at the park, such as camping, night hikes, and astronomy, as well as bird and bat migrations which draw many naturalists to the park. We recommend the usage of night sky-compliant lighting to reduce such effects.

Page 30

- 3rd paragraph of section 4.4 - Revise the sentence “...on November 26, 3013, the Coast Guard extended an invitation to the Secretary of the Interior” to “...on November 26, 2013, the Coast Guard sent a letter to the Secretary of the Interior”. This is a minor distinction, but because the letter was not received, it is more accurate. Delete the last sentence “No response has been received to date.” The National Park Service, Northeast Regional Office, on behalf of the Secretary of the Interior, responded in a letter dated June 2, 2014. (Letter is in appendix.)

Page 31

- 1st paragraph – incorrect date – the letter was dated November 18, **2013**
- 3rd paragraph - The proper name of Gateway is Gateway National Recreation Area.

Page 33

- 2nd paragraph under Proposed Action – delete the National Park Service from the first sentence. The NPS did not consult with the USCG regarding archeological resources.

Page 34

- This section is of significant concern to the National Park Service, as the analysis does not discuss the visual impacts to the larger NHL district, including the vast majority of contributing buildings that lie within the boundaries of Gateway NRA, less than 200 feet from the site of the new MMB, as well as the Chem Lab and buildings 141 and 142 within the USCG boundaries. Due to their large scale and mass, the new buildings, particularly the MMB, will be visible from many places in the park, and will markedly affect the feeling and setting of park historic properties. The NPS requests that the Coast Guard provide visual simulations, similar to those developed for the National Historic Preservation Act (NHPA) Section 106 consultations, to illustrate the extent and intensity of the visual impacts. We furthermore request that they be from locations that the NPS identifies as most critical to understanding the impacts to the viewsheds within the park and NHL.

On page 41, we note that one of the measures included in the MOA is the Coast Guard's commitment to continue work with the NJ State Historic Preservation Office and the National Park Service to revise the architectural design for the new buildings in order to help mitigate visual impacts. In addition to a full discussion of the visual impacts of the project, the National Park Service requests coordination with the Coast Guard on appropriate measures to minimize the visual impacts.

Page 35

- Last paragraph - We are not aware of the March 13, 2014, letter to the National Park Service regarding the National Register of Historic Places (NRHP) eligibility of building 123. However, in discussions with the NJ HPO in April 2014, the National Park Service did provide the NJ HPO with our opinion that building 123 was a contributing building within the NHL district.

Page 36

- 3rd paragraph – Recommend revision of first sentence to “The construction of new buildings within the NHL-designated Fort Hancock and Sandy Hook Proving Ground Historic District, as with any NHL district, is a sensitive process.” The Coast Guard is subject to Section 110(f) of the NHPA, wherein Congress mandated Federal agencies, to the greatest extent possible, to minimize harm to NHLs; it is not solely the opinion of the NJ HPO and the NPS.
- 3rd and 4th paragraphs - We disagree that the new buildings are “designed in a manner that is complementary of the historic buildings and structures that remain at this USCG Station” or in a “manner that is compatible with the historic materials, feature, size, scale, and proportion as well as this historic architectural setting of this NHL district.” Specifically, the size, scale, and proportion of the MMB are not compatible with the NHL district (which is larger than “this USCG Station”) and are the major reasons that the project will have an adverse effect under Section 106 (see the NJ HPO letter of May 22, 2014, and the NPS letter of June 2, 2014 in the appendix). The current design does not incorporate all possible measures to avoid and minimize adverse impacts and there are additional design changes that could be made that would help to make it more compatible. (See comment on page 38 below.)

Page 37

- According to the Secretary of the Interior's “Standards for the Treatment of Historic Properties,” new construction cannot “reinforce” the historic significance of a district, nor can new buildings “strengthen the core characteristics” of a historic district. Rather, new buildings should be compatible with, not

detract from, and retain the character defining features of the historic district. There should be a clear description of the impacts of the new buildings on the character defining features of the NHL district and on its resources, including both Coast Guard and National Park Service properties.

Page 38

- These design suggestions and minimization proposals do not address the characteristics that have the greatest visual impact on the historic district, namely the massing, volume, and roof profile of the MMB. A complete assessment of the impacts of the project on the NHL district would highlight those issues and should identify design suggestions similar to those found on pages 38 and 39 that would minimize the visual impacts; appropriate solutions would include, but not be limited to, lowering the roof profile, or using a flat roof or attic story style for the top floor, and using appropriate architectural finishes. We request that you secure the assistance of a historical architect that meets the Secretary of the Interior's professional qualifications to perform this assessment.
- Consider differentiating the issue from the response in URS' review of the designs – e.g., put URS' comment in italics. As written, it is difficult to tell the difference.

Page 40

- 2nd paragraph – Last paragraph, revise to read as follows: “The Coast Guard sent a letter dated December 3, 2013, to the NPS NHL program stating that Coast Guard intended to prepare an Environmental Assessment for this project.” The letter stated that Section 106 project review would occur through the EA, and was not as clear a request for immediate project review as is stated here.
- Last paragraph – in the second to last sentence, delete the word “quality” after “HABS”.
- Last paragraph – last sentence, delete “NPS.” The mitigation measures were agreed upon by the Coast Guard, NJ HPO, and the ACHP, who were signatories to the MOA and will be responsible for carrying out the stipulations. The NPS signed as a concurring party.

Page 41

- The summary of MOA stipulations includes mention of a proposed MMB communication tower; however, this tower is not included in the description of the action alternative. A complete description of the proposed tower should be included in the description of the action alternative, including estimated height and tie-down methods, in order to properly assess visual effects and potential effects to birds.
- The Summary of Impacts table should be updated to reflect the impacts that the project will also have upon Gateway NRA's resources.

Page 44

- The first paragraph in the table under Proposed Action lists as an impact the “introduction of new construction that is incompatible with the characteristics of the NHL district.” However, this impact is not discussed in section 4.4.2 of the impact analysis, and is inconsistent with the information presented on page 36. As previously noted, visual effects of the proposed action outside the Coast Guard's property should be fully discussed and disclosed.

Page 45

- Second paragraph under Cumulative Impacts: the NPS projects described here, while actual projects, are not Sandy Recovery projects, as is implied by the opening sentences.

Page 46

- Two agencies are missing from the list below. While they were involved in the Section 106 process rather than NEPA, that process is the basis for the impact assessment for cultural resources:
 - National Park Service, Northeast Region, National Historic Landmark program
 - Advisory Council on Historic Preservation

Summary Comments

The National Park Service appreciates the opportunity to provide these comments and looks forward to further discussion with USCG Station Sandy Hook. For more information on park resources, please contact Marilou Ehrler, Chief of Cultural Resources, at (718) 354-4561.

Sincerely,

A handwritten signature in black ink, reading "Maryanne Gerbauckas". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Maryanne Gerbauckas
Associate Regional Director, Resource Stewardship
Northeast Region, National Park Service

Cc: Jennifer Nersesian, GATE

**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G7: National Park Service

National Park Service
c/o Maryanne Gerbauckas
Northeast Region
200 Chestnut Street
Philadelphia, PA 19106

Date of Letter: 28 August 2014

Comment G7-a. Page 1 The proper name of Gateway is Gateway National Recreation Area (see third paragraph). It would also be more accurate to state this as "The entire Sandy Hook peninsula lies within the legislative boundaries of the National Park Service (NPS) Gateway National Recreational Area."

USCG Response: Noted; EA text has been revised.

Comment G7-b. Page 2 3rd bullet -Recommend revising "and is designated as a historic site" to "and is a contributing structure to a National Historic Landmark district."

USCG Response: Noted; EA text has been revised.

Comment G7-c. Page 3 Proposed action - The proposal to demolish 22 non-historic Borough Housing Units could be of significant advantage for Gateway NRA natural resources management goals and Coast Guard vegetation management, if the Coast Guard would restore a native forest community on that former housing site. The new (April 2014) General Management Plan for Gateway NRA identified the American Holly Forest (*Ilex opaca*) as a fundamental resource on the Sandy Hook peninsula. The present trend of sea level rise and increased frequency of severe coastal storms is destroying portions of the historic 101-acre Maritime Holly Forest. Ecological succession, however, is shifting the holly forest northward and eastward onto higher elevations of the peninsula. Early seral stages of vegetation in the backdunes are naturally replaced with Successional Maritime Forest and Maritime Holly Forest. The Coast Guard can contribute to this maritime forest preservation in an ever-changing environment by restoring the Borough Housing site to shrublands and forest. This will provide habitat for American Holly trees and for the migratory birds and other wildlife that depend on these plants for cover and food. Reforestation on this site with native woody plants also will retard the invasion by non-native Asian Sand Sedge (*Carex kobomugi*) which now covers more than 54 acres of the Sandy Hook peninsula, including a monoculture in the north side of the Coast Guard property. Control of invasive non-native species is also consistent with Federal Executive Order 13112 and New Jersey Executive Order 97.

USCG Response: Noted; USCG will be working with Gateway National Recreation Area throughout the proposed design and construction period; the two agencies have agreed to develop vegetative restoration plans together in accordance with the natural environment present in the area. Restoring the Borough Housing Area to shrublands and forest is a potentially viable alternative, as long as historic foundations and interpretative signage remain accessible.

Comment G7-d. Page 4 1st paragraph in Section 3.3 – it would be more accurate in the last sentence to say "There are no other acceptable locations within Station Sandy Hook that meet time critical deployment distances for responses to distress calls." There might actually be better locations within the NHL district, but they would be on NPS land.

USCG Response: Noted; EA text has been revised. It is not possible to pursue relocation of the USCG Station onto NPS land for the recapitalization effort. USCG is not funded to completely recapitalize the entire Station Sandy Hook facility, which would be required if any component of the mission critical facility was moved off USCG land to NPS property. The BMF and MMB must be adjacent to each other and must be located on the USCG waterfront area in order to meet mission requirements for time critical deployments.

Comment G7-e. Page 5 2nd paragraph – It is unclear why placing the MMB and Boat Maintenance Facility (BMF) "in extremely close proximity to each other" and presenting "a huge building mass on the waterfront" are negatives. One possible reading is that there was concern about visual impacts to the NHL district; however, visual impacts are not discussed in the impact analysis, which would make this reasoning inconsistent. Recommend adding a phrase or sentence to explain why these are issues.

USCG Response: As explained throughout the Section 106 consultation process and in the letter to the NJ HPO dated 6 May 2014 (EA Appendix C), the mission requirements for the BMF require drive-through and turn around access for boats and trailers. Placing the new MMB in the location of the existing MMB would not allow for these required design features. Additionally, the MMB must have a line of sight to the boat basin area; placing the MMB in the current Station Building location would not allow sufficient visual access.

Comment G7-f. 3rd paragraph – it is unclear that these are the best "higher ground" locations without the inclusion of an elevation/floodplain map for reference.

USCG Response: USCG has included elevation details in letter to SHPO dated 6 May 2014 (EA Appendix C) and in USCG response to comment G1-e (Township of Middleton).

Comment G7-g. 4th paragraph – Recommend revision of "is designated as a historical site" to "is a contributing structure to the NHL district".

USCG Response: Noted; text changed in EA.

Comment G7-h. 4th paragraph -this states that the Small Arms Firing Range (SAFR) was sited to avoid "proximity to historic structures." As

written, it is unclear why the same standard was not applied to the site of the MMB. Recommend adding clarification as to this point.

USCG Response: As reiterated throughout the planning and Section 106 consultation process, mission requirements dictate the location of the MMB; it must be within the immediate vicinity of the boat basin area and have a visual sight of same. The SAFR location is more flexible with regard to where it can be located, since it does not need to be adjacent to the BMF and boat basin. Please see USCG response to comment G1-e (Township of Middleton).

Comment G7-i. Page 11 Noise -The EA does not analyze the impacts of noise within Gateway National Recreation Area. Noise impacts to the park are reasonably foreseeable, since the demolition of buildings 123 and 103 and the construction site of the MMB are adjacent to the boundary between the Station and the park, and there are park housing units on the other side of Hartshome Drive (buildings 102, 104, 108, 119, and 120) that could also be affected by noise and vibrations. There may also be effects to park visitors from noise from pile-driving; the heaviest tourist season runs from Memorial Day to Labor Day.

USCG Response: Per the MOA, to which NPS was a concurring signatory, USCG shall work with Gateway National Recreation Area to reduce impacts to their operations during construction activities, especially during the peak tourist season and on nights and weekends. USCG will also prepare a vibratory monitoring plan as part of the mitigation efforts. Please see the final MOA Stipulations in Appendix E of the Sandy Hook EA.

Comment G7-j. Page 12 Section 4.3 - Please also include an assessment of the impacts of any changes in lighting from the project. The night environment is important for many activities at the park, such as camping, night hikes, and astronomy, as well as bird and bat migrations which draw many naturalists to the park. We recommend the usage of night sky-compliant lighting to reduce such effects.

USCG Response: As there is no contract in place yet for the design-build, USCG does not yet have details for a lighting plan. As the design process continues, USCG shall consider usage of night sky-compliant lighting to reduce effects.

Comment G7-k. Page 30 3rd paragraph of section 4.4 - Revise the sentence "...on November 26, 2013, the Coast Guard extended an invitation to the Secretary of the Interior" to "...on November 26, 2013, the Coast Guard sent a letter to the Secretary of the Interior". This is a minor distinction, but because the letter was not received, it is more accurate. Delete the last sentence "No response has been received to date." The National Park Service, Northeast Regional Office, on behalf of the Secretary of the Interior, responded in a letter dated June 2, 2014. (Letter is in appendix.)

USCG Response: Noted; the EA text has been revised.

Comment G7-l. Page 31 1st paragraph -incorrect date -the letter was dated November 18, 2013

USCG Response: Noted; the EA text has been revised.

Comment G7-m. 3rd paragraph - The proper name of Gateway is Gateway National Recreation Area.

USCG Response: Noted; "National" will be added throughout the text of the EA when referring to the Gateway NRA.

Comment G7-n. Page 33 2nd paragraph under Proposed Action - delete the National Park Service from the first sentence. The NPS did not consult with the USCG regarding archeological resources.

USCG Response: NPS was present and actively participated on multiple interagency Section 106 consultation teleconferences with NJ HPO, ACHP and USCG, and the 22 June 2014 interagency meeting at Station Sandy Hook, where avoiding impacts to archaeological resources was one of the key discussion components. Additionally, the 2 June 2014 letter from Maryanne Gerbauckus of NPS to John Poland of USCG states NPS concurrence with NJ SHPO's determination of adverse effect, in part due to "potential for unplanned damage during construction to surface and subsurface contributing resources."

Comment G7-o. Page 34 - This section is of significant concern to the National Park Service, as the analysis does not discuss the visual impacts to the larger NHL district, including the vast majority of contributing buildings that lie within the boundaries of Gateway NRA, less than 200 feet from the site of the new MMB, as well as the Chem Lab and buildings 141 and 142 within the USCG boundaries. Due to their large scale and mass, the new buildings, particularly the MMB, will be visible from many places in the park, and will markedly affect the feeling and setting of park historic properties. The NPS requests that the Coast Guard provide visual simulations, similar to those developed for the National Historic Preservation Act (NHPA) Section 106 consultations, to illustrate the extent and intensity of the visual impacts. We furthermore request that they be from locations that the NPS identifies as most critical to understanding the impacts to the viewsheds within the park and NHL.

USCG Response: USCG does not yet have detailed design plans for the construction of the new structures, as a design-build contract has yet to be awarded. However, as requested by the NJ HPO and NPS, USCG generated viewshed depictions from eight different locations on both USCG and NPS property during the historic consultation process. These viewsheds were vetted through the NJ HPO, ACHP, and NPS during the consultation process, which culminated in a fully executed MOA. USCG is also committed to working with NPS on a landscaping plan that will help reduce visual impacts to the district from the new construction, as well as negotiating design finishes that will help reduce impacts of the new structures to the historic district. Please see USCG response to comments G1-c, G1-d, and G1-e (Township of Middletown).

Comment G7-p. On page 41, we note that one of the measures included in the MOA is the Coast Guard's commitment to continue work with the NJ State Historic Preservation Office and the National Park Service to revise the architectural design for the new buildings in order to help mitigate visual impacts. In addition to a full discussion of the visual impacts of the project, the

National Park Service requests coordination with the Coast Guard on appropriate measures to minimize the visual impacts.

USCG Response: Noted.

Comment G7-q. Page 35 Last paragraph - We are not aware of the March 13, 2014, letter to the National Park Service regarding the National Register of Historic Places (NRHP) eligibility of building 123. However, in discussions with the NJ HPO in April 2014, the National Park Service did provide the NJ HPO with our opinion that building 123 was a contributing building within the NHL district.

USCG Response: As requested, USCG has provided the 13 March 2014 letter to multiple NPS entities on several occasions; please see Appendix C of the EA for a copy of the letter entitled *Addendum to Project Review Request-Hurricane SANDY Project to Rebuild USCG Station Sandy Hook, New Jersey*, which was sent from USCG to the National Historic Landmark Program of NPS.

Comment G7-r. Page 36 3rd paragraph -Recommend revision of first sentence to "The construction of new buildings within the NHL-designated Fort Hancock and Sandy Hook Proving Ground Historic District, as with any NHL district, is a sensitive process." The Coast Guard is subject to Section 110(f) of the NHPA, wherein Congress mandated Federal agencies, to the greatest extent possible, to minimize harm to NHLs; it is not solely the opinion of the NJ HPO and the NPS.

USCG Response: Noted; EA text has been revised.

Comment G7-s. 3rd and 4th paragraphs - We disagree that the new buildings are "designed in a manner that is complementary of the historic buildings and structures that remain at this USCG Station" or in a "manner that is compatible with the historic materials, feature, size, scale, and proportion as well as this historic architectural setting of this NHL district." Specifically, the size, scale, and proportion of the MMB are not compatible with the NHL district (which is larger than "this USCG Station") and are the major reasons that the project will have an adverse effect under Section 106 (see the NJ HPO letter of May 22, 2014, and the NPS letter of June 2, 2014 in the appendix). The current design does not incorporate all possible measures to avoid and minimize adverse impacts and there are additional design changes that could be made that would help to make it more compatible. (See comment on page 38 below.)

USCG Response: Noted; please see USCG response to comments G1-c, G1-d, and G1-e (Township of Middletown).

Comment G7-t. Page 37 According to the Secretary of the Interior's "Standards for the Treatment of Historic Properties," new construction cannot "reinforce" the historic significance of a district, nor can new buildings "strengthen the core characteristics" of a historic district. Rather, new buildings should be compatible with, not detract from, and retain the character defining features of the historic district. There should be a clear description of the impacts

of the new buildings on the character defining features of the NHL district and on its resources, including both Coast Guard and National Park Service properties.

USCG Response: Noted; the EA text has been revised to refer to specific adverse effects on the NHL district caused by the introduction of the new buildings, and refers the reader to the NJ HPO's adverse effect determination letter. Please see response to comment G7-bb.

Comment G7-u. Page 38 These design suggestions and minimization proposals do not address the characteristics that have the greatest visual impact on the historic district, namely the massing, volume, and roof profile of the MMB. A complete assessment of the impacts of the project on the NHL district would highlight those issues and should identify design suggestions similar to those found on pages 38 and 39 that would minimize the visual impacts; appropriate solutions would include, but not be limited to, lowering the roof profile, or using a flat roof or attic story style for the top floor, and using appropriate architectural finishes. We request that you secure the assistance of a historical architect that meets the Secretary of the Interior's professional qualifications to perform this assessment.

USCG Response: As detailed in the MOA, on which NPS was a concurring signatory, USCG has agreed to incorporate design suggestions as practicable to minimize visual impacts of the new structures on the historic district. As is also detailed in the MOA, USCG has also agreed to secure a qualified historic architect, meeting the Secretary of Interior's Professional Qualification Standards.

Comment G7-v. Consider differentiating the issue from the response in URS' review of the designs – e.g., put URS' comment in italics. As written, it is difficult to tell the difference.

USCG Response: Noted.

Comment G7-w. Page 40 2nd paragraph - Last paragraph, revise to read as follows: "The Coast Guard sent a letter dated December 3, 2013, to the NPS NHL program stating that Coast Guard intended to prepare an Environmental Assessment for this project." The letter stated that Section 106 project review would occur through the EA, and was not as clear a request for immediate project review as is stated here.

USCG Response: No revisions made to EA text. The subject line of the 3 December 2013 letter was "Request for Project Review" and the next to last paragraph in the letter states "...the Coast Guard requests that your agency review the proposed project and provide comments..."

Comment G7-x. Last paragraph – in the second to last sentence, delete the word "quality" after "HABS".

USCG Response: Noted. "HABS-quality" will be removed from the EA text and replaced with "HABS Level II."

Comment G7-y. Last paragraph -last sentence, delete "NPS." The mitigation measures were agreed upon by the Coast Guard, NJ HPO, and the

ACHP, who were signatories to the MOA and will be responsible for carrying out the stipulations. The NPS signed as a concurring party.

USCG Response: NPS signed the MOA as a “Concurring Signatory.” This sentence states that NPS, in addition to the other agencies, agreed upon the mitigation measures as detailed in the document. USCG is responsible for carrying out the stipulations, but several of these stipulations also require input, reviews, and coordination from NPS.

Comment G7-z. Page 41 The summary of MOA stipulations includes mention of a proposed MMB communication tower; however, this tower is not included in the description of the action alternative. A complete description of the proposed tower should be included in the description of the action alternative, including estimated height and tie-down methods, in order to properly assess visual effects and potential effects to birds.

USCG Response: The details of tower design have not yet been finalized, but the EA text in Section 3.2 Proposed Action, has been revised to note that the proposed action includes installation of a self-supported, 90-foot tall, Rohn-type tower assembly. The new tower will be very similar to an existing communications tower located adjacent to the administrative complex, as shown in this photograph.



Historic/archaeological issues associated with the tower were addressed with the NJ HPO (see attached email dated 16 May 2014 from Lynn Keller of the USCG to Jonathan Kinney and Jesse West-Rosenthal at the NJ HPO, which includes the tower location site plan and a generic Rohn tower specification). At the request of the NJ HPO, the location for the tower was moved to the northwest corner of the new MMB to avoid archaeological resources on the east side of the MMB. An undated historic photograph of the Sandy Hook Station Building with two similar communications towers is also attached, as communications towers have always been a component of USCG stations

from the late 19th century to the present. Although construction of this tower would add a new vertical element within the viewshed, its open-lattice construction method allows one to essentially look through the structure, unlike the solid mass of the three new buildings. There would be minimal visual impact on historic resources, because the new tower location is similar to the "visual field" of the existing communication tower near the administrative complex.

Information has been added to Section 4.3.1 Flora and Fauna, to address potential effects on migratory birds. Because the proposed tower will be 90 feet tall and self-supported, no impacts to migratory birds from colliding with the tower are anticipated. Lighted guy-wired towers taller than 199 feet above ground level are particularly hazardous to migratory birds. In its *Interim Guidelines For Recommendations On Communications Tower Siting, Construction, Operation, and Decommissioning*, USFWS recommends that new towers not be more than 199 feet above ground level and not include guy wires (USFWS 2000).

Comment G7-aa. The Summary of Impacts table should be updated to reflect the impacts that the project will also have upon Gateway NRA's resources.

USCG Response: It is possible that construction/demolition noise could be audible to Gateway NRA wildlife or visitors, but this impact would be temporary and minor. The EA text has been revised in Section 4.2.3 Noise and Section 4.5 Summary of Impacts Table 3. No other construction-related impacts are likely to affect Gateway NRA resources.

Comment G7-bb. The first paragraph in the table under Proposed Action lists as an impact the "introduction of new construction that is incompatible with the characteristics of the NHL district." However, this impact is not discussed in section 4.4.2 of the impact analysis, and is inconsistent with the information presented on page 36. As previously noted, visual effects of the proposed action outside the Coast Guard's property should be fully discussed and disclosed.

USCG Response: Please see response to comment G7-t. Section 4.4.2 contains the following language, which addresses the impact analysis and concludes that the undertaking will result in an adverse effect on historic properties.

"On April 15, 2014, the USCG and a URS architectural historian attended a meeting with the NJ HPO to discuss the final Sandy Hook designs and URS' analysis and recommendations. The meeting included a discussion of how the new building designs referenced historic buildings still extant within the historic district. At this meeting, the NJ HPO stated that it is still evaluating the effects of introducing three new, very large buildings within the NHL District boundaries. Coast Guard personnel were informed that the NJ HPO's preliminary determination was that the introduction of these buildings, despite their sensitive design, would constitute an Adverse Effect on the NHL district, based on their incompatibility with the design, size, scale, proportion, and massing of the surrounding historic buildings. The undertaking will diminish the historic district's integrity of design, setting, and feeling, and will alter character-defining spatial relationships within the district by introducing large new buildings in new locations and directly adjacent to contributing resources (Appendix C)."

The information in the two sections is not inconsistent, but reflects the process through which the Coast Guard worked to comply with National Historic Preservation Act (NHPA). Taking into consideration the compressed, Congressionally-mandated timeframe for the proposed recapitalization project, a number of factors drove the architectural program and design of new buildings at the Station. First and foremost, the Coast Guard must continue to provide multiple life-safety services, including search and rescue operations, law enforcement, incident management, disaster response, cruise ship support, and security for Presidential visits and United Nation operations. New buildings must meet these mission requirements, and also must be designed to address new and expanded security requirements, building codes, and flood plain elevation constraints. The Coast Guard was aware of its responsibilities under the NHPA for this proposed action. The Coast Guard made a good-faith effort to comply with its NHPA Section 106 obligations and the Secretary of the Interior's Standards for Rehabilitation, as part of the broader Secretary of the Interior's Standards for the Treatment of Historic Properties. The USCG was certainly aware of the NHL status of the Fort Hancock and Sandy Hook Proving Grounds Historic District, and took extensive measures to minimize the extent of adverse effects on the character-defining features of the NHL district.

In projects such as these, agencies must balance competing legal and regulatory requirements to achieve a project that is in the best interest of the public. In this case, because of the proximity to the NHL district, the Coast Guard specifically retained the services of a consulting firm with experience in assessing the effects of new construction on historic properties, with the goal of modifying design elements to lessen the level of adverse effects. While there may be disagreement, the Coast Guard believes that the revised design of new buildings at the station achieved a reduction in their effect on the historic district. The Coast Guard would also note that the guidance contained in the Secretary of the Interior's Standards for Rehabilitation is advisory, and not regulatory, in nature. To ultimately be successful, the project design had to address the mandatory new requirements noted above, which severely constrained what might have been possible, in terms of historically-compatible architectural design, when compared to non-coastal locations.

The Coast Guard acknowledges that the massing of the MMB, BMF, and SAFR buildings is sizable. As noted above, the requirements for these buildings are dictated most directly by USCG mission operational requirements and FEMA flood zone regulations. In reviewing these designs, the Coast Guard consulted with a historic architect, architectural historians, the Advisory Council on Historic Preservation, the New Jersey State Historic Preservation Office (NJ HPO) and with historic architects with the National Park Service's (NPS) Northeast Regional Office. Because the overall size and scale of new buildings could not be modified further, the Coast Guard and the NJ HPO agreed that the project will have an adverse effect on the character-defining features of the NHL historic district. As described in the EA, a Memorandum of Agreement (MOA) has been negotiated and executed to offset these adverse effects. Importantly, this agreement document stipulates future actions required to mitigate the adverse effects, some of which will be completed in the short-term, and others to be completed within the next 5 years. The signatories agreed to 13 stipulation measures that will improve future coordination among the Coast Guard, the National Park Service, and the NJ HPO. Most importantly, these stipulations will ensure that a long-term plan for the consideration of

historic properties at USCG Station Sandy Hook will be developed. This Cultural Resources Management Plan (CRMP) will specifically include design recommendations to ensure improved coordination with these agencies and groups, in terms of new construction at the station.

Regarding the comment that visual effects of the proposed action should be fully discussed and disclosed, the undertaking's APE is identified in the first paragraph on page 29 of section 4.4.2 Historic Architectural Resources. Areas other than the NHL district that are components of the Gateway NRA are well outside the viewshed of the APE's 1-mile radius.

Comment G7-cc. Page 45 Second paragraph under Cumulative Impacts: the NPS projects described here, while actual projects, are not Sandy Recovery projects, as is implied by the opening sentences.

USCG Response: Noted; USCG was not implying these are SANDY Recovery projects, as a new sentence starts the discussion of NPS projects in the area. For clarity, a paragraph break has been added in front of this sentence.

Comment G7-dd. Page 46 Two agencies are missing from the list below. While they were involved in the Section 106 process rather than NEPA, that process is the basis for the impact assessment for cultural resources:

- **National Park Service, Northeast Region, National Historic Landmark Program**
- **Advisory Council on Historic Preservation**

USCG Response: Noted; the EA text has been revised to include these agencies.

Keller, Lynn M CIV

From: Keller, Lynn M CIV
Sent: Friday, May 16, 2014 3:25 AM
To: 'Jonathan.Kinney@dep.state.nj.us'; Jesse West-Rosenthal (Jesse.West-Rosenthal@dep.state.nj.us)
Cc: Amundson, Dean J CIV; Lewis, James M CIV
Subject: FW: Message from "280-RICOHMP6002"
Attachments: Rohn SSV.PDF; MMB Towe_20140515.pdf

Hello, Jonathan and Jesse.

In response to your request on Wednesday for additional clarification on the proposed communication tower and avoiding archaeological areas of interest or archaeological areas that have not yet been delineated, please see the attached info below from the USCG project engineer.

Proposed Communication Tower

Per our discussion yesterday, I talked with the project engineer and she sees no issue with moving the proposed communication tower to a new location where archaeological resources are not a concern. Please see the attached drawing entitled "MMB Tower 20140515." Debbie has relocated the communication tower off the northwest corner of the proposed new MMB; please note the red square on the attached drawing noting the new proposed tower location. The new location is still in close proximity to the MMB and near the road servicing the buildings.

The proposed tower specified for the design build contract is a self supporting, tapered Rohn-type tower (Tower Assembly #SS090D90), ninety feet in height; please refer to the attached drawing entitled "Rohn SSV." The tower is skeletal steel pressed tube construction, with three faces arranged in a triangle, wide at the bottom and tapering up to the top. This tower meets ANSI specifications and is designed to withstand hurricane force winds, as well as support the planned communications equipment loading proposed. These towers are pre-engineered to meet required loading conditions, therefore the size of the structural members to support the base and tapering ratio are predetermined.

Archaeological Areas Noted by Jesse as Potential Resources or Areas Not Yet Evaluated for Archaeological Resources

Debbie confirmed that USCG will be able to avoid using the highlighted areas noted by Jesse for ground disturbing areas, including temporary facilities, laydown areas, etc. All temporary and permanent structures and staging areas can be relocated to areas within the USCG Station Sandy Hook complex that have previously been cleared for archaeological resources or currently consist of an impervious surface. The building mission and design for the proposed MMB requires that a driveway service the rear of the building, but the apron of the driveway can be shortened so that the archaeological findings areas near the corner of Building 123 can be avoided.

Please call my cell phone if you need additional clarification on anything tomorrow. Due to time constraints and the need to receive a SHPO determination on the proposed new structures at Station Sandy Hook prior to getting a response back from NHL, if you could please issue this determination letter ASAP it would be appreciated. We are hoping to receive your letter by tomorrow, Fri 5/16, so that NHL can submit a response to USCG next week, prior to our planned conference call scheduled for Fri 23 May.

Thanks very much for your time,
Lynn

Lynn M. Keller, EI, PMP
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay St Ste 700N
Oakland, CA 94612
Office: 510-637-5532
Cell: 510-418-4704

-----Original Message-----

From: Chinn, Debra M CIV
Sent: Thursday, May 15, 2014 2:55 PM
To: Keller, Lynn M CIV; mckellster6@gmail.com
Cc: Brito, Francis A CIV
Subject: RE: Message from "280-RICOHMP6002"

Lynn,

(1) The driveway access at the MMB for deliveries to the galley loading dock and maintenance vehicles is needed. We can reduce the length of the "dog-leg" and have the trucks back into the loading dock from the street. Yes, we can locate all of the other areas of disturbance on impervious surfaces or within the areas that were surveyed for archaeological resources and cleared.

(2) We can locate the comms tower on the northwest side of the MMB. I still need to confirm with TISCOM if this is acceptable to them. This area seems to be clear based on the arch survey. The tower will be design-build by the contractor but a likely design can be 90 ft tall, triangular steel tube, tower face spread of 6'6", with foundation base of 12'L x12'W x5'D.

Let me know if you have questions.
Debbie

-----Original Message-----

From: Keller, Lynn M CIV
Sent: Wednesday, May 14, 2014 2:58 PM
To: Chinn, Debra M CIV
Cc: Brito, Francis A CIV
Subject: FW: Message from "280-RICOHMP6002"

Hi, Debbie. SHPO left me a message today on concerns with the new construction drawings. They want clarification on these items prior to issuing their adverse effect letter for the new structures (which they said they would send by 16 May).

(1) I am assuming we want to avoid any additional archaeological surveys at SH to avoid any additional delay. In this case, we need to only utilize previously surveyed (archaeological surveyed) areas for use as lay down, temp storage, Connex boxes for temp storage/ops, etc. Please see attached SHPO mark ups on areas we have cited that either have archaeological significance or have not yet been surveyed. Can we state in writing that we can locate all of these areas of disturbance on impervious surfaces or within the areas that were surveyed for archaeological resources and cleared?

(2) SHPO wants more details on the proposed communication tower near the new MMB. It needs to be located elsewhere-currently it's on the existing Bldg 123 area (may or may not be demo'd) and near some artifacts. Pls specify the tower including type, height, materials, depth of foundation, appearance, and location.

I will try to catch you on the phone today after you get a chance to look this over.
Thank you!

Lynn

-----Original Message-----

From: Kinney, Jonathan [Jonathan.Kinney@dep.state.nj.us]
Sent: Wednesday, May 14, 2014 05:34 PM Eastern Standard Time
To: Keller, Lynn M CIV
Cc: West-Rosenthal, Jesse
Subject: FW: Message from "280-RICOHMP6002"

Lynn,
Please see the attached plan sheets with areas we discussed highlighted in yellow.

Jonathan Kinney
Senior Historic Preservation Specialist

New Jersey Historic Preservation Office
Phone: (609) 984-0141 Fax: (609) 984-0578
Email: jonathan.kinney@dep.state.nj.us
Website: <http://www.nj.gov/dep/hpo>
Mailing Address:
Mail Code 501-04B
Department of Environmental Protection
Historic Preservation Office
P.O. Box 420
Trenton, NJ 08625-0420

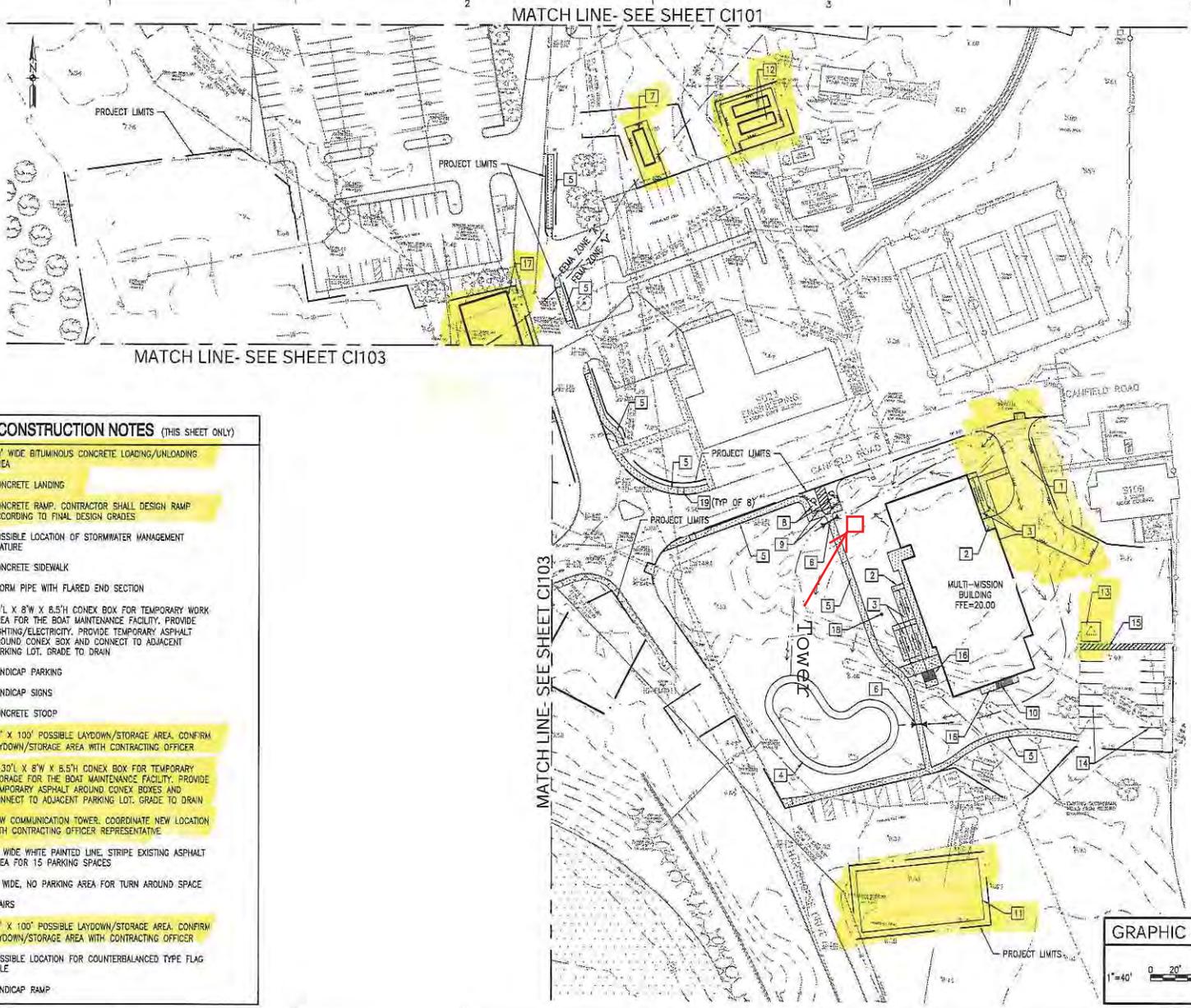
-----Original Message-----

From: 280ricohmp6002@dep.state.nj.us [mailto:280ricohmp6002@dep.state.nj.us]
Sent: Wednesday, May 14, 2014 5:05 PM
To: Kinney, Jonathan
Subject: Message from "280-RICOHMP6002"

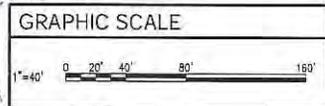
This E-mail was sent from "280-RICOHMP6002" (Aficio MP 6002).

Scan Date: 05.14.2014 17:04:39 (-0400)
Queries to: 280ricohmp6002@dep.state.nj.us

SUMNER/HA/2013/03/0300-STATION SWHY-HOOK LOD-NORFOLK SHEETS/C102 SHIPYARD LAYOUT C102 3/13/2014 2:05PM DWGSCALE: 1:1



- CONSTRUCTION NOTES (THIS SHEET ONLY)**
1. 20' WIDE BITUMINOUS CONCRETE LOADING/UNLOADING AREA
 2. CONCRETE LANDING
 3. CONCRETE RAMP, CONTRACTOR SHALL DESIGN RAMP ACCORDING TO FINAL DESIGN GRADES
 4. POSSIBLE LOCATION OF STORMWATER MANAGEMENT FEATURE
 5. CONCRETE SIDEWALK
 6. STORM PIPE WITH FLARED END SECTION
 7. 30' L X 8' W X 8.5' H CONEX BOX FOR TEMPORARY WORK AREA FOR THE BOAT MAINTENANCE FACILITY, PROVIDE LIGHTING/ELECTRICITY, PROVIDE TEMPORARY ASPHALT AROUND CONEX BOX AND CONNECT TO ADJACENT PARKING LOT, GRADE TO DRAIN
 8. HANDICAP PARKING
 9. HANDICAP SIGNS
 10. CONCRETE STOOP
 11. 50' X 100' POSSIBLE LAYDOWN/STORAGE AREA, CONFIRM LAYDOWN/STORAGE AREA WITH CONTRACTING OFFICER
 12. 2-30' L X 8' W X 8.5' H CONEX BOX FOR TEMPORARY STORAGE FOR THE BOAT MAINTENANCE FACILITY, PROVIDE TEMPORARY ASPHALT AROUND CONEX BOXES AND CONNECT TO ADJACENT PARKING LOT, GRADE TO DRAIN
 13. NEW COMMUNICATION TOWER, COORDINATE NEW LOCATION WITH CONTRACTING OFFICER REPRESENTATIVE
 14. 4" WIDE WHITE PAINTED LINE, STRIPE EXISTING ASPHALT AREA FOR 15 PARKING SPACES
 15. 5' WIDE, NO PARKING AREA FOR TURN AROUND SPACE
 16. STAIRS
 17. 40' X 100' POSSIBLE LAYDOWN/STORAGE AREA, CONFIRM LAYDOWN/STORAGE AREA WITH CONTRACTING OFFICER
 18. POSSIBLE LOCATION FOR COUNTERBALANCED TYPE FLAG POLE
 19. HANDICAP RAMP



CLARK NEXSEN
NORFOLK, VIRGINIA
757-465-5800

CONSULTANTS

SHPO SUBMITTAL
3/14/2014

U. S. COAST GUARD
FACILITIES DESIGN &
CONSTRUCTION CENTER



915 SECOND AVENUE, ROOM 2664
SEATTLE, WASHINGTON 98174-1011

MARK	DATE	DESCRIPTION

A/E PROJECT NO: 5050
CAD FILE NAME: C102 SHPO.DWG
DESIGNED BY: JSS
DRAWN BY: TSS
EDITED BY: JSS
CHECKED BY: RAC

SCALE: 1"=40' PLOT SCALE: 1 : 1

SHEET TITLE

REBUILD STATION SANDY HOOK
STATION SANDY HOOK
SANDY HOOK NEW JERSEY

CIVIL
SITE LAYOUT PLAN

REVIEWED BY:	REVIEWED BY:	REVIEWED BY:
PROJECT ENG.	BRANCH CHIEF	TECH. DIRECTOR

APPROVING OFFICER	DATE
-------------------	------

PROJECT NUMBER	DRAWING NUMBER
----------------	----------------

5250932

DISCIPLINE/SH NO
C102 SHEET 10 OF 23

Photographs:



"SANDY - HOOK"; no date/photo number; photographer unknown.
Courtesy of Van Field.



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Telephone Number (609) 292-3600
FAX NUMBER (609) 633-2102

CHRIS CHRISTIE
Governor

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

September 5, 2014

Ms. Lynn Keller
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, California 94612

RE: Hurricane Sandy Proposed Recapitalization Project Rebuild
USCG Station Sandy Hook
Middletown Township, Monmouth County

Comments on Draft Environmental Assessment

Dear Ms. Keller:

The New Jersey Department of Environmental Protection's (NJDEP) Office of Permit Coordination and Environmental Review (PCER) distributed, for review and comment, the Draft Environmental Assessment for the Hurricane Sandy Proposed Recapitalization Project to Rebuild the US Coast Guard (USCG) Station at Sandy Hook, Middletown Township, Monmouth County on August 18, 2014. This office previously provided comment on this project on December 13, 2013 as enclosed.

We offer the following comments for your consideration.

Cultural Resources

HPO Project # 13-1346

The proposed undertaking is located entirely within the boundaries of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District. The United States Coast Guard (USCG), New Jersey Historic Preservation Office (NJHPO), Advisory Council on Historic Preservation (ACHP), National Park Service (NPS), and numerous other consulting parties were involved in extensive consultation, pursuant to Section 106 of the National Historic Preservation Act, for this undertaking. This consultation process is described in detail in the Draft Environmental Assessment document.

The undertaking received a finding of adverse effect upon historic properties as a result of the demolition of one contributing building (Building #123) and the introduction of new construction that was determined to be incompatible with the historic character and setting of the historic district. A Memorandum of Agreement (MOA) incorporating

measures to avoid, minimize, and mitigate the adverse effects of the project was developed and executed on July 22, 2014 by the USCG, NJ HPO, and ACHP, with concurrence by the NPS. A copy of the MOA document is attached.

If you have any questions, please do not hesitate to contact Jonathan Kinney at (609) 984-0141 or via email at jonathan.kinney@dep.nj.gov. If additional consultation is required for this undertaking, please reference the HPO project # 13-1346 in any future calls, emails, or written correspondence in order to expedite our review and response.

Natural Resources

The Department's Division of Fish and Wildlife's (DFW) Endangered & Non-game Species Program and the Bureau of Marine Fisheries' (BMF) concerns/recommendations for the project:

The Bureau of Marine Fisheries notes that the Water Quality Certificate (WQC) is contingent on USCG following the winter flounder timing restrictions (Jan. 1 to May 31) and concurs with the NOAA EFH assessment.

Any activity within 1000' of an active Osprey nest must be avoided between March 15 and September 15 of any given year.
DFW concurs with other mitigation measures provided.

If demolition is to take place during the nesting season and if NPS staff determines there is a disturbance of the birds nesting on the beach, the USCG shall have a contingency mechanism to address this issue including, but not limited to, halting demolition until nesting completed.

If you have any additional concerns, please contact Kelly Davis at (908-236-2118) or via email at kelly.davis@dep.nj.gov

Land Use Regulation

The Division of Land Use Regulation's Office of Dredging and Sediment Technology issued a federal consistency determination for this project on March 4, 2014 as enclosed. This determination includes a review for flood hazard area (FHA) impacts. However, the Coast Guard shall provide a site plan in the final EA showing the area of proposed boat basin dredging and the location where the dredged material will be placed. If the dredged material will be off-site, a letter from the receiving site accepting the material must be submitted to the department for approval.

If you have any additional questions, please contact Jeff Thein at (609) 633-1256 in the Office of Dredging and Sediment Technology at (609) 777-3819 or via email at Jeff.Thein@dep.nj.gov

Air Planning

The Bureau of Air Quality Planning (BAQP) has reviewed the Draft Environmental Assessment for the Recapitalization Project USCG Station at Sandy Hook. The BAQP will not be submitting any comments on the above project.

If you have any additional questions, please contact Angela Skowronek at (609) 984-0337

Stormwater Management

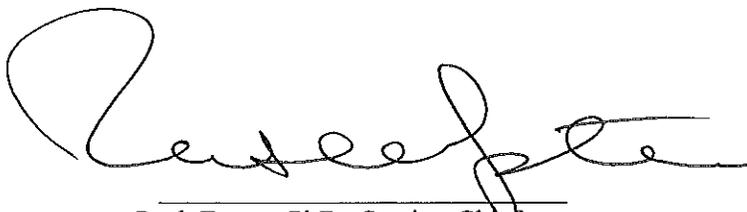
A general permit for Construction Activities, (5G3) may be required from the Department. This general permit authorizes stormwater discharges from construction activities which disturb areas greater than 1 acre or smaller areas that are part of a large plan of common development greater than 1 acre. The applicant must have a certified Soil Erosion and Sediment Control Plan by the Monmouth County Soil Conservation District in order to have the necessary information for a complete permit application. The permit application process is available online at <http://www.state.nj.us/dep/dwq/5g3.htm>.

Stormwater management issues will be addressed by the local government unless a Department land use issue is involved.

If you have any additional questions, please contact Brian McLendon at (609) 633-7021.

Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the Draft Environmental Assessment for the Hurricane Sandy Proposed Recapitalization Project to Rebuild the US Coast Guard Station at Sandy Hook, Middletown Township, Monmouth County.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ruth Foster', written over a horizontal line.

Ruth Foster, PhD., Section Chief
Office of Permit Coordination
and Environmental Review

Enclosures

C: John Gray, NJDEP-PCER
Jonathan Kinney, NJDEP- HPO
Kelly Davis, NJDEP – DFW
Kara Turner – Land Use
Jeff Thein – Land Use-ODST
Brian McLendon – Stormwater Management
Chron file

**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G8: New Jersey Department of Environmental Protection

Dr. Ruth Foster
State of New Jersey
Dept of Environmental Protection
Office of Permit Coordination and Environmental Review
P.O. Box 420 Mail Code 401-07J
Trenton, New Jersey 08625-0420

Date of Letter: 5 September 2014

Comment G8-a. The undertaking received a finding of adverse effect upon historic properties as a result of the demolition of one contributing building (Building #123) and the introduction of new construction that was determined to be incompatible with the historic character and setting of the historic district. A Memorandum of Agreement (MOA) incorporating measures to avoid, minimize, and mitigate the adverse effects of the project was developed and executed on July 22, 2014 by the USCG, NJ HPO, and ACHP, with concurrence by the NPS. A copy of the MOA document is attached.

USCG Response: Noted; USCG has been working on the NHPA Section 106 consultation closely with NJ HPO since June 2013.

Comment G8-b. The Bureau of Marine Fisheries notes that the Water Quality Certificate (WQC) is contingent on USCG following the winter flounder timing restrictions (Jan. 1 to May 31) and concurs with the NOAA EFH assessment.

USCG Response: Noted; when dredging and waterfront design is determined, USCG shall reengage with NJDEP on the consistency determination and WQC. The Design-Build contractor specifications will incorporate the timing restrictions for winter flounder.

Comment G8-c. Any activity within 1000' of an active Osprey nest must be avoided between March 15 and September 15 of any given year. DFW concurs with other mitigation measures provided. If demolition is to take place during the nesting season and if NPS staff determines there is a disturbance of the birds nesting on the beach, the USCG shall have a contingency mechanism to address this issue including, but not limited to, halting demolition until nesting completed.

USCG Response: Noted; during the site visits to Station Sandy Hook on October 4, 2013, and January 17, 2014, biologists did not observe any osprey nests. One nesting platform (vacant at the time of the site visits) is located approximately 1,000 feet north of the beached concrete dock and the boat basin. If the beached dock is proposed for removal

between March 15 and September 15, USCG shall have a biologist inspect the nesting platform and the area within 1,000 feet of the beached dock for any active osprey nests. If an active nest is identified, the removal will be delayed until after September 15. This requirement is included in the D-B contractor specifications.

Comment G8-d. The Division of Land Use Regulation's Office of Dredging and Sediment Technology issued a federal consistency determination for this project on March 4, 2014 as enclosed. This determination includes a review for flood hazard area (FHA) impacts. However, the Coast Guard shall provide a site plan in the final EA showing the area of proposed boat basin dredging and the location where the dredged material will be placed. If the dredged material will be off-site, a letter from the receiving site accepting the material must be submitted to the department for approval.

USCG cannot provide a detailed dredge site plan at this time, as the contract for dredging has not yet been awarded. Following contract award, a detailed dredge plan, including determination of disposal of dredge spoils, shall be submitted to NJDEP. USCG has limited dredge disposal options to reuse onsite for fill material at proposed building demolition locations or disposal off-site. Dredge material has been tested and is clean and greater than 90% sand content.

Comment G8-e. A general permit for Construction Activities, (5G3) may be required from the Department. This general permit authorizes stormwater discharges from construction activities which disturb areas greater than 1 acre 01•smaller areas that are part of a large plan of common development greater than 1 acre. The applicant must have a certified Soil Erosion and Sediment Control Plan by the Monmouth County Soil Conservation District in order to have the necessary information for a complete permit application. The permit application process is available online at [http://www.state.nj.us/dep/dwg/5g3 .htm](http://www.state.nj.us/dep/dwg/5g3.htm). Stormwater management issues will be addressed by the local government unless a Department land use issue is involved

Noted; this requirement shall be built into the construction specifications.

Chaisson, Angela

From: Lynn.M.Keller@uscg.mil on behalf of Keller, Lynn M CIV <Lynn.M.Keller@uscg.mil>
Sent: Friday, August 29, 2014 8:00 PM
To: Chaisson, Angela; Amundson, Dean J CIV; Lewis, James M CIV; Poland, John R CIV
Cc: Chinn, Debra M CIV; McKenna, Joseph A CIV; Brito, Francis A CIV; Edwards, Mark; Rymer, Matthew A CDR; Healy, John A CAPT
Subject: PUBLIC COMMENT RECEIVED FOR SANDY HOOK EA FW: Sandy Hook Demolition

Lynn M. Keller, EI, PMP

Environmental Protection Specialist

USCG SILC EMD (det) Oakland

1301 Clay St Ste 700N

Oakland, CA 94612

Office: 510-637-5532

Cell: 510-418-4704

From: karen@zahler.com [<mailto:karen@zahler.com>]

Sent: Friday, August 29, 2014 11:59 AM

To: Keller, Lynn M CIV

Subject: Sandy Hook Demolition

Dear Ms. Keller,

I am against the demolition of structures at the historic Sandy Hook base. These structures were important to the crew and staff based at Sandy Hook during its heyday and add to visitors' overall experience as to how life was at Sandy Hook.

Yours truly,
Karen Ramsden-Zahler

USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project

Letter G9: Ms. Karen Ramsden-Zahler

Karen Ramsden-Zahler
karen@zahler.com

Date of Electronic Mail Message: 29 August 2014

Comment G9-a. I am against the demolition of structures at the historic Sandy Hook base. These structures were important to the crew and staff based at Sandy Hook during its heyday and add to visitors' overall experience as to how life was at Sandy Hook.

USCG Response: Noted.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930-2276

AUG 26 2014

Lynn Keller, EI, PMP
Project Manager
Environmental Protection Specialist
USCG SILC EMD (det) Oakland
1301 Clay Street, Suite 700N
Oakland, CA 94612

RE: Draft Environmental Assessment, Hurricane Sandy Proposed Recapitalization Project to Rebuilt USCG Station Sandy Hook, New Jersey

Dear Ms. Keller:

We are responding to your office's August 14, 2014 letter requesting comments on the draft Environmental Assessment (EA) for the Hurricane Sandy Proposed Recapitalization Project to Rebuilt USCG Station Sandy Hook, New Jersey. The proposed action's preferred alternative will require dredging and reconstruction of the waterfront area at the USCG Sandy Hook Station. This work will involve repairs or replacement of the wharf, piers, breakwaters, floating docks, groins, utilities, and a boat ramp to return them to pre-Hurricane Sandy condition. In addition, the project will include dredging with a closed clamshell environmental bucket dredge a maximum of 12,423 cubic yards of 90% sand, uncontaminated sediment from the existing boat basin. Dredged material will be disposed of on land.

After review of your draft EA, we feel the following sections need further information on species listed by NOAA's National Marine Fisheries Service (NMFS), as well as further analyses of the potential direct and indirect of the proposed project on these species:

Section 4.2.3 Noise

Under Proposed Action, there is no mention of underwater noise caused by pile installation; only sound that travels through the air is mentioned here.

Section 4.3.5 Essential Fish Habitat and NOAA Trust Resources

On page 24, Table 6: Other NOAA Trust Resources Impact Assessment, the information presented regarding Atlantic sturgeon is incorrect. The table states, "The action area at Sandy Hook has never supported a historical population of Atlantic sturgeon, and, to date, not Atlantic sturgeon have been observed in this system. Therefore, Atlantic sturgeon are not anticipated to occur in the project area."



The information on Atlantic sturgeon that we provided in our above-referenced December 19, 2013 letter reads: “Atlantic sturgeon occur in estuarine and marine waters along the U.S. Atlantic coast and may be present in the action areas. The New York Bight, Chesapeake Bay, South Atlantic and Carolina DPSs of Atlantic sturgeon are endangered; the Gulf of Maine DPS is threatened. Individuals originating from any of these DPSs could occur in the project area.”

It may be useful to note that Dunton *et al.* (2010) identified several “hotspots” for Atlantic sturgeon captures, and one of those is located along the east coast of Sandy Hook, New Jersey. Dunton *et al.* also identified “coastal areas of < 20m depth” as essential habitat for juvenile migrant Atlantic sturgeon, and said that “the narrow band of shallow water appears to represent an important habitat corridor and potential migration path.” The aggregation area off Sandy Hook is believed to be used primarily during the late fall and spring, although some sturgeon can still be found in this area during the winter and the summer months (Dunton *et al.* 2010; Erickson *et al.* 2011). Atlantic sturgeon are known to spawn in the Hudson River, and use the coastal bays, including Sandy Hook Bay, Raritan Bay, and New York’s Upper and Lower Bays, for foraging and migration.

This information should be updated in the table to reflect that ESA-listed Atlantic sturgeon may occur in the action area and may be affected by the proposed project.

On page 25, Table 6 presents information on sea turtles that is also not reflective of the best available information. The table says that loggerhead, Kemp’s ridley, green, or leatherback turtles are found in offshore waters, and are not likely to occur in the action area. However, information provided in the December 19, 2013 letter¹ says that all four species of sea turtles are likely to occur along New Jersey’s coast, particularly from May to mid-November. Leatherbacks, as noted in the letter, are less likely to occur, but may still occur in the area.

Recent survey and satellite tracking data support that loggerhead sea turtles occur in waters from the beach to beyond the continental shelf (Mitchell *et al.* 2003; Braun-McNeill and Epperly 2004; Mansfield 2006; Blumenthal *et al.* 2006; Hawkes *et al.* 2006; McClellan and Read 2007; Mansfield *et al.* 2009). Similarly, Kemp’s ridley adults are primarily found in nearshore waters of 37 m or less that are rich in crabs and have a sandy or muddy bottom (NMFS and USFWS 2007). Green sea turtles occur seasonally in Mid-Atlantic and Northeast waters such as Chesapeake Bay and Long Island Sound (Musick and Limpus 1997; Morreale and Standora 1998; Morreale *et al.* 2005), which serve as foraging and developmental habitats. Leatherbacks

¹ “Several species of threatened and endangered sea turtles occur seasonally in New Jersey waters. Sea turtles occur along New Jersey’s coast, including many bays and harbors, during the warmer months, typically from May to mid-November. The sea turtles in these waters are typically small juveniles with the most abundant being the federally threatened Northwest Atlantic Distinct Population Segment (DPS) of loggerhead (*Caretta caretta*) followed by the federally endangered Kemp’s ridley (*Lepidochelys kempfi*). New Jersey waters have also been found to be warm enough to support federally endangered green sea turtles (*Chelonia mydas*) from June through October. While federally endangered leatherback sea turtles (*Dermochelys coriacea*) may be found in the waters off New York and New Jersey during the warmer months as well, this species is less likely to occur in the action area for this project as it is typically found in more offshore waters. You can find more information on listed sea turtle species at: <http://www.nmfs.noaa.gov/pr/species/turtles/>.”

are also known to use coastal waters of the U.S. continental shelf (James *et al.* 2005a; Eckert *et al.* 2006; Murphy *et al.* 2006), and have been sighted in water depths ranging from 1 to 4,151 m, with 84.4% of sightings were in waters less than 180 m (Shoop and Kenney 1992).

The following language (in italics) should be updated to say that these species of sea turtles may occur in the action area and may be affected by the proposed project:

Loggerhead sea turtle: The most abundant species occurring in New Jersey waters is the federally threatened Northwest Atlantic Distinct Population Segment (DPS) of loggerhead (*Caretta caretta*). *This species is typically found in more offshore waters and is not likely to occur in the action area for this project. Therefore, the project activities are not anticipated to affect loggerhead sea turtles or their habitat.*

Kemp's ridley sea turtle: The second most abundant species occurring in New Jersey waters is the federally endangered Kemp's ridley (*Lepidochelys kempi*). *This species is typically found in more offshore waters and is not likely to occur in the action area for this project. Therefore, the project activities are not anticipated to affect Kemp's ridley sea turtles or their habitat.*

Green sea turtle: Although the federally threatened green sea turtle (*Chelonia mydas*) may occur in nearby waters from June through October, *it is typically found in more offshore waters. Therefore, the project activities are not anticipated to affect green sea turtles or their habitats.*

Leatherback sea turtle: The federally endangered leatherback sea turtle (*Dermochelys coriacea*) *is not likely to occur in the action area because it is typically found in more offshore waters. Therefore, the project activities are not anticipated to affect leatherback sea turtles or their habitats.*

In addition, hawksbill sea turtles should be removed from the table. Hawksbill sea turtles are not found as far north as the action area, as they are "circumtropical," remaining in waters from 30° N to 30° S latitude. However, they are not "typically found in more offshore waters," as noted in the table, so if they remain in the table that statement should be corrected to note that they are typically found in more southern waters, not offshore waters.

On page 26, under the heading "Other NOAA Trust Resources Impact Determination," the statement "Shortnose and Atlantic sturgeon do not occur in the project area..." should be modified to delete "and Atlantic," because Atlantic sturgeon are likely to occur in the project area, as noted above. An additional statement should be added to note that Atlantic sturgeon may be in the action area, and may experience effects from the action.

In the following paragraph, the statement that "loggerhead, Kemp's ridley, green, leatherback, and hawksbill turtles are unlikely to be found in the project area due to shallow water depths and the nearshore location of the project site" should be modified to say that loggerhead, Kemp's ridley, green, and leatherback sea turtles may be in the action area, as explained above. Hawksbills should either be removed from the paragraph, or the statement should be changed to note that hawksbills will not be in the area because the area is north of their normal range.

Section 4.5 Summary of Impacts

On page 41, the table says that there will be no impacts to shortnose or Atlantic sturgeon, and no impacts to listed whales or sea turtles. We recommend updating this part of the table to say there could be impacts to Atlantic sturgeon and four species of sea turtles. We would recommend considering the effects of pile driving and dredging on Atlantic sturgeon, green sea turtles, loggerhead sea turtles, leatherback sea turtles, and Kemp's ridley sea turtles. Effects may include increased turbidity, loss of prey, and acoustic impacts from pile driving.

NMFS uses the following thresholds for sturgeon and sea turtle injury and behavioral modification due to acoustic impacts, such as pile driving:

Organism	Injury*	Behavioral Modification
Sturgeon	206 dB re 1 μ Pa _{Peak} <u>and</u> 187 dB _{CSEL}	150 dB re 1 μ Pa _{RMS}
Sea Turtle	180 dB re 1 μ Pa _{RMS}	166 dB re 1 μ Pa _{RMS}

If levels produced by pile driving at 10 meters from the activity exceed the threshold levels, we would recommend using sound mitigation devices, such as cushion blocks or bubble curtains.

Section 6: Cumulative Impacts

There is no mention here of effects to ESA-listed species under NMFS jurisdiction. Based on the above information, we would recommend adding information regarding cumulative impacts to Atlantic sturgeon and four species of sea turtles.

Conclusion

As the proposed action has the potential to effect ESA listed species of sea turtles and Atlantic sturgeon, we encourage you to consider further the effects of the proposed action on the ESA-listed species noted above. As you may know, any discretionary federal action, such as the approval or funding of a project by a Federal agency, that may affect a listed species must undergo consultation pursuant to Section 7 of the ESA. The U.S. Coast Guard and/or the U.S. Army Corps of Engineers will be responsible for determining whether the proposed action is likely to affect listed species when the permit for work is issued. When project plans are complete, either USCG or USACE should submit a determination of effects, along with justification for the determination, and a request for concurrence to the attention of the Section 7 Coordinator, NMFS, Northeast Regional Office, Protected Resources Division, 55 Great Republic Drive, Gloucester, MA 01930. After reviewing this information, NMFS would then be able to conduct a consultation under section 7 of the ESA. Should you have any questions about this correspondence please contact Jennifer Goebel at 978-281-9373 or by email (Jennifer.Goebel@noaa.gov).

Magnuson-Stevens Act

NMFS Habitat Conservation Division (HCD) is responsible for overseeing programs related to Essential Fish Habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act and other NOAA trust resources under the Fish and Wildlife Coordination

Act. HCD is currently reviewing the DEA and accompanying EFH assessment. Comments and EFH conservation recommendations will be provided to you separately. If you wish to discuss this further, please contact Karen Greene (732-872-3023 or karen.greene@noaa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Murray". The signature is fluid and cursive, with a long horizontal stroke at the end.Handwritten initials "for" in black ink, positioned to the left of the typed name.

David Gouveia
Acting Assistant Regional Administrator
for Protected Resources

EC: Greene, NMFS/GARFO/HCD
Goebel, NMFS/GARFO/PRD

File Code: Section 7/Nonfisheries/USCG/2014/Sandy Hook Recap EA Comments

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**USCG Response to EA Comments Received
USCG Station Sandy Hook Hurricane SANDY Recapitalization Project**

Letter G10: National Marine Fisheries Service, Protected Resources Division

David Gouveia
Acting Assistant Regional Administrator for Protected Resources
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, Massachusetts 01930-2276

Date of Letter: 26 August 2014

Comment G10-a. Section 4.2.3 Noise. Under the Proposed Action there is no mention of underwater noise caused by pile installation; only sound that travels through the air is mentioned here.

USCG Response: A discussion of underwater noise caused by pile driving and potential acoustic impacts on aquatic species has been added to Sections 4.3.1 Flora and Fauna and Section 4.3.5 Essential Fish Habitat and Other NOAA Trust Resources (in Table 6, EFH Assessment Impact Determination, and Other NOAA Trust Resources Impact Determination.)

Comment G10-b. Section 4.3.5 Essential Fish Habitat and NOAA Trust Resources. Information presented regarding Atlantic sturgeon and sea turtles is incorrect (paraphrased).

USCG Response: The EA text in Section 4.3.5 has been corrected to state that Atlantic sturgeon, loggerhead sea turtles, Kemp's Ridley sea turtles, green sea turtles, and leatherback sea turtles may occur within the action area of the project and may be affected by project activities. Effects may include increased turbidity, loss of prey, and acoustic impacts from pile driving.

Comment G10-c. Section 4.5 Summary of Impacts. We recommend updating [the summary of impacts table] to say there could be impacts to Atlantic sturgeon and four species of sea turtles. We would recommend considering the effects of pile driving and dredging on Atlantic sturgeon, green sea turtles, loggerhead sea turtles, leatherback sea turtles, and Kemp's Ridley sea turtles. Effects may include increased turbidity, loss of prey, and acoustic impacts from pile driving.

USCG Response: The text in Section 4.3.5 Essential Fish Habitat and NOAA Trust Resources has been updated to read as follows (this text has also been summarized in Section 4.5 Summary of Impacts Table 3):

"Proposed Action – The Coast Guard has determined that there will be no substantial adverse effect on EFH from the Proposed Action because any impacts will be temporary and negligible to minor. Temporary impacts on EFH may include increased turbidity, loss of prey, and acoustic impacts from pile driving.

Construction activities will incorporate best management practices to comply with New Jersey's Surface Water Quality Standards, pursuant to Section 401 of the CWA. As part of its Coastal Zone Consistency Determination issued on March 4, 2014, NJDEP also imposed a seasonal restriction of January 1 to May 31 to protect winter flounder (Appendix C); in its response dated December 2, 2013, NMFS referenced the same restriction (Appendix C). In a letter dated September 5, 2014, the NJDEP Bureau of Marine Fisheries noted that it concurred with the EFH Assessment and reiterated this restriction (Appendix G), which has been incorporated into the D-B contractor specifications.

The extent of acoustic impacts would depend on the depth of the water, the diameter of the piles, and the type of hammer to be used, which will be determined by the D-B contractor. NMFS has stated that if the steel pipe piles for the bulkhead replacement will exceed 24 inches in diameter the sound levels start to near the injury threshold for sturgeon and sea turtles. If the steel pipe piles will exceed 24 inches in diameter, NMFS may request that a wood cushion block be used to absorb sound energy and attenuate underwater noise (Marrone, personal communication). In its letter dated August 26, 2014, NMFS reiterated this request (Appendix G). This mitigation measure, if needed, will be incorporated into the D-B contractor specifications."

Comment G10-d. Section 6 Cumulative Impacts. We would recommend adding information regarding cumulative impacts to Atlantic sturgeon and four species of sea turtles.

USCG Response: The EA text in Section 6 Cumulative Impacts has been updated to include this information.

Comment G10-e. When project plans are complete, either USCG or USACE should submit a determination of effects, along with justification of the determination, and a request for concurrence to the NMFS Section 7 Coordinator.

USCG Response: Noted; when dredging and waterfront design are determined, USCG shall reengage with NMFS on the effects determination and WQC.