

July 24, 2023

Naval Facilities Engineering Systems Command, Atlantic
Attn: EV21, CVN SEIS Project Manager
6506 Hampton Blvd, Building A
Norfolk, VA 23508

Subject: Public Scoping Comments for the Supplemental Environmental Impact Statement for Improving Homeport Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the U.S. Pacific Fleet

Dear CVN SEIS Project Manager:

The City of Coronado (City) appreciates this opportunity to offer public scoping comments for the Supplemental Environmental Impact Statement (SEIS) for Improving Homeport Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the U.S. Pacific Fleet. As the host city for Naval Air Station North Island (NASNI) and the proposed project, the proposal to extend the time that three NIMITZ-Class Aircraft Carriers can be simultaneously homeported is of significant interest to the City of Coronado and its residents.

It is our understanding that the proposed action would increase the amount of time three NIMITZ-Class Aircraft Carriers can be simultaneously homeported in Coronado from 29 days to an average of 180 intermittent, non-consecutive days per year. The City further understands that the Navy intends to analyze the project's potential impacts to/from traffic, air quality, socioeconomics, environmental justice, biological resources, cultural resources, geology and soils, hazardous materials and waste, infrastructure, land use, noise, public health and safety, visual resources, and water resources.

The City appreciates the Navy's intent to comprehensively evaluate the project's impact on the local environment and offers the following comments to help define the scope of analysis included in the SEIS.

Project Description

The public notice for the proposed SEIS indicates that "...the Navy plans to analyze the impacts of an anticipated need for three aircraft carriers to be in port simultaneously for an average of 180 intermittent, non-consecutive days per year". It is the City's understanding that 180 days does not represent the maximum number of days that three aircraft carriers could be simultaneously homeported at NASNI, but rather, is a number that would be used to frame the scope of the environmental analysis. The City requests that the Navy clarify the meaning of "180 intermittent,

non-consecutive days per year” and indicate the maximum number of days that three carriers could be homeported at NASNI under the proposal. If the proposal would allow three aircraft carriers to be homeported for a duration longer than 180 days, the environmental analysis should be based on the maximum number of days to accurately evaluate potential environmental impacts and to develop adequate mitigation measures to avoid, minimize, or reduce those impacts.

The project description also refers to “proposed electrical power infrastructure”, but does not include any details about the scope or nature of this activity. Please provide additional information about this proposal, including its purpose, operating characteristics, location(s), and dimensions. Depending on the scope and nature of this activity, additional environmental study and analysis may be required (e.g., cultural resources if excavation into native soils is required).

Transportation and Traffic

The SEIS should include a detailed and comprehensive technical evaluation of the existing on- and off-base transportation infrastructure, traffic conditions, the project’s anticipated traffic generation, and its direct and cumulative impacts to traffic congestion and transportation infrastructure, including consideration of the project’s impacts when combined with other past, present, and future projects.

The traffic analysis should include an evaluation of the project’s impact on the levels of service (LOS) of City roadways and intersections, the San Diego-Coronado Bridge, State Routes 282 and 75, and assess the increase in vehicle miles traveled (VMT).

For each identified traffic impact, the SEIS should identify feasible, measurable, and legally enforceable mitigation measures with the goal of reducing vehicle trips, VMTs, and/or financing improvements to local transportation infrastructure. Specifically, the Navy should commit to 1) investing in viable alternatives to single-occupancy vehicle trips, such as restoring direct ferry service between downtown San Diego and NASNI, providing expanded and improved alternative transit options such as direct bus services to NASNI, commuter buses, and vanpool and carpool options; 2) providing financial incentives for active duty personnel and the civilian workforce to utilize alternative transportation options; 3) developing more on-base housing to reduce the number of commuters; and 4) coordinate with Caltrans, SANDAG, and the City of Coronado to finance and implement meaningful improvements to the local transportation network.

The SEIS should not rely on mitigation schemes that distribute vehicle trips to Coronado’s residential streets to minimize impacts to primary arterials and thereby avoid mitigation requirements. The SEIS should also not focus on implementation of staggered work hours that aim to reduce the intensity of traffic impacts at the expense of further extending the peak commute period and duration of traffic congestion. These types of mitigation measures, which may minimize the project’s impact on a roadway’s level of service during specific times of day, do not remove any vehicle trips and consequently should only be considered if complementary to measures which measurably reduce vehicle trips and/or VMTs.

The City also encourages the Navy to prioritize on-base operational and circulation changes that can effectively reduce vehicle trips, congestion, and off-base traffic impacts.

Land Use

The SEIS should evaluate changes to land use and the regulatory setting since the 2008 SEIS, including the construction and operation of the Coronado Naval Base Coastal Campus, and new development that has occurred both on-base and within the City of Coronado.

Additionally, the SEIS should consider significant changes to the housing market since 2008, including the State of California's housing shortage, the rapid escalation of real estate costs and increasing lack of affordable housing options, and most importantly, recent policy changes by the State of California and SANDAG to require local cities to produce more affordable housing and to provide housing opportunities for active-duty service members and civilian employees of federal military installations.

The SEIS should identify the increased number of service members and the maximum duration that they are anticipated to be at NASNI and evaluate the impact the increased population may have on housing availability and demands for public services and facilities, including schools, medical facilities, police, fire protection, and parks and recreation facilities. The SEIS should also include appropriate mitigation and/or programs to minimize resultant impacts and the associated costs to the City of Coronado of providing housing and expanded public services and facilities.

Air Quality

The SEIS should evaluate the project's impact on air quality resulting from increased emissions from automobiles and homeported vessels. The SEIS should assess the project's compliance with the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), and specifically evaluate ozone, volatile organic compounds, nitrogen oxides and nitrogen dioxide, carbon monoxide, sulfur dioxide, and particulate matter emissions and whether identified emissions would result in any air quality violations or contribute to any regional non-attainment of air quality standards.

Climate Change/Greenhouse Gas Emissions

The SEIS should analyze the increase in greenhouse gas (GHG) emissions resulting from increased automobile traffic and expanded operations of homeported vessels, including CO₂, methane, nitrous oxides, hydrochlorofluorocarbons, hydrofluorocarbons, and ozone emissions. The SEIS should include adequate mitigation, such as measures to reduce VMTs, to ensure that post-project GHG emissions are equal to or less than the baseline condition.

Noise

The SEIS should consider the project's generation of noise from increased automobile traffic and expanded operations of vessels homeported in Coronado. The SEIS should evaluate whether any new or increased noise would violate the City of Coronado's Noise Ordinance or result in a significant impact to nearby sensitive receptors, including but not limited to, residential, education, elder care, or medical care uses.

Infrastructure

The SEIS should assess potential increases in sewer and stormwater flows resulting from the project and determine whether such increases would require any new or expanded facilities either on- or off-base. The SEIS should also examine past failures of the on-base sewage system and

odor issues and propose mitigation measures to upgrade the system to prevent future failures and offensive odors from impacting nearby Coronado residents. The Navy's existing chemical dosing program in the wastewater system for odor reduction is not pro-actively monitored/adjusted to account for changes in wastewater flows related to additional ships in port; this is an aspect that should be reviewed for improvement.

Hazards/Hazardous Materials

The SEIS should describe the types of hazardous materials anticipated to be involved with the project, including radiological elements, and evaluate potential adverse impacts from the production, use, storage, transport, and/or potential release of hazardous materials. The SEIS should also describe applicable regulations, programs, and policies that govern the use, storage, and transport of hazardous materials, emergency response plans and protocols for managing and remediating potential accidental releases of hazardous materials, and how the project would comply with applicable regulations.

Water Quality

The SEIS should consider potential impacts to marine water quality and surface water quality resulting from the proposed project, describe operational practices to avoid or minimize contamination of marine and surface waters, and outline any proposed mitigation measures and/or best management practices proposed to avoid significant environmental effects.

Biological Resources

The SEIS should include updated biological surveys and a new evaluation of the project's potential impacts on marine life and their habitats, including but not limited to plankton, eelgrass, invertebrates, fish, birds, marine mammals, and sea turtles. The SEIS should identify any state or federally listed threatened or endangered species known to reside in the project vicinity and evaluate whether the proposed project may result in any direct or indirect impacts to those species. If potential impacts are identified, the SEIS should detail proposed mitigation measures to avoid or minimize any adverse effects.

Respectfully submitted,

Richard Bailey
Mayor

cc: City Council
City Manager Tina Friend