



CITY OF CORONADO

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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

1. **Clarify Project Duration:** 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 within any 12-month period. If the proposal would allow three aircraft carriers to be homeported for a duration longer than 180 days within a 12-month period, the SEIS should clearly indicate the maximum duration three carriers could be homeported at NASNI, and 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.

2. **Clarify and Detail Electrical Power Infrastructure Proposal:** The project description included in the public notice 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 and/or visual/aesthetic if any improvements are proposed above-ground).

A FAQ sheet posted to the project website, however, indicates that the proposed electrical power infrastructure is needed to support next-generation aircraft carriers, and that these upgrades “may extend off-base along utility corridor on 1st Street in Coronado.” A graphic within the FAQ sheet also shows the proposed electrical power infrastructure extending beyond D Avenue.

The City of Coronado is in the process of a major utility undergrounding project which include overhead utilities on 1st Street. Accordingly, any new utilities installed within the City of Coronado should also be undergrounded.

3. **Detail Proposed Increase in Maintenance Activities:** The Notice of Intent and FAQ sheet suggest an increase in aircraft carrier maintenance activities would occur as a result of the project. The SEIS should detail the nature and extent of increased maintenance activities and quantify the number of additional maintenance workers and contractors that would be employed at NASNI to perform the work. The increase in maintenance workers and associated vehicle trips travelling to/from NASNI should be evaluated in the SEIS and associated traffic analysis.

Environmental Baseline

The SEIS baseline should be established as the 2000 Navy action to homeport three aircraft carriers at NASNI to account for the cumulative and unmitigated environmental impacts that have incrementally occurred since the Navy first intensified its aircraft carrier operations in Coronado. The 1999 EIS and 2008 SEIS included a number of mitigation measures to reduce project impacts, but it is unclear how many of those mitigation measures were actually implemented and remain ongoing. The Navy has not previously provided any evidence to demonstrate whether those measures have effectively reduced past project impacts. In the absence of measurable evidence, the City believes the Navy should account for all project impacts since 2000 when three aircraft

carriers began homeporting in Coronado and provide effective and quantifiable mitigation measures to reduce impacts affecting the City and its residents.

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, objective, 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, expanded water-borne transportation options between NASNI and San Diego, Chula Vista, and/or Point Loma Naval Base, providing expanded and improved alternative transit options such as direct bus services to NASNI, commuter buses, vanpool and carpool options, reducing the amount of available on-base parking, and increased telework opportunities; 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 SEIS should also segregate and quantify traffic resulting from past, current, and future Navy projects from traffic generated from non-military operations. For example, the 2008 SEIS made unsubstantiated claims that increased traffic in Coronado was a result of civilian residential growth and tourism. While the City has experienced modest increases in tourism, residential growth has not significantly increased, particularly given the ongoing trend of people purchasing property in Coronado as part-time vacation homes. The greatest intensification of development that has occurred in Coronado over the past 10-15 years has been the increased development and operations of Navy facilities, including homeporting of additional aircraft carriers and construction and operation of the Coronado Naval Base Coastal Campus.

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 and Housing

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. The SEIS should also 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 the increasing lack of affordable housing options.

Most importantly, the SEIS should consider and evaluate impacts from increasing the number of active-duty service members and civilian employees in light of recent policy changes by the State of California and the San Diego Association of Governments (SANDAG) that requires the City of Coronado to provide housing opportunities for all active-duty service members and civilian employees of Naval Base Coronado. This circumstance is unique to Coronado because it is the only California city that has a major military installation entirely within its borders and a State mandate to provide adequate housing opportunities for employees of a federal military installation, whereas other cities with military bases are allowed to share the housing burden with other cities and counties in its region. Consequently, any increase in active duty or civilian personnel will likely result in the State of California and SANDAG requiring Coronado to provide increased housing opportunities for federal employees.

The SEIS should specifically evaluate the impact of increased housing demands for its sailors and any associated increases in civilian personnel and how this will impact a small, isolated city like Coronado that does not have the vacant land, financial resources, or housing opportunity sites necessary to accommodate the Navy's growing housing needs.

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 that provide adequate housing to fully accommodate its service member population 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. The SEIS should also include mitigation measures to offset any increases in GHG emissions resulting from the project, including additional solar energy facilities, increased use of electric vehicles, shuttles, and ferries, and electric vehicle charging stations.

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.

Visual Resources/Aesthetics

The SEIS should evaluate the visual/aesthetic impacts resulting from the increased presence of multiple aircraft carriers in Coronado, any proposed overhead utilities, and light/glare from aircraft carriers or new security lighting.

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.

Coastal Act Consistency

The Navy should confer with staff from the California Coastal Commission during preparation of the SEIS. The SEIS should also include a detailed evaluation of the project's compliance with the California Coastal Act and describe how the project will achieve the required Coastal Act Consistency Determination.

Respectfully submitted,



Tina Friend
City Manager

cc: City Council