

terrain disruption, air pollution (e.g. sulfur dioxide emissions), water supply contaminations, and so forth.

Third, the impacts are essentially irrevocable changes to our atmosphere with possible severe climatic impacts. There is roughly one kilogram of CO₂ released per dollar of economic activity in the U.S. Thus, each unit of economic activity generates very long term disruption to our atmosphere since that carbon dioxide will stay in the atmosphere for an average of hundreds of years.

Fourth, the principal source of our energy use is fossil fuel, by definition non renewable. Our domestic petroleum and gas supplies are quite finite. For example, U.S. production of oil peaked in 1970 (as predicted by King Hubbert in 1955). It has been declining steadily since then despite huge drilling investments, so that we now produce roughly half of what we did in the 70's. The difference comes from imported oil, which now represents approximately 60 percent of the Nation's supply. It is not clear when the total world oil production will peak, but it will be in 2007 (predicted by King Hubbert in 1968 and by Colin Campbell in 1998). It is hard to find a prediction made by any competent researcher that pushes the peak beyond about 2030 assuming continued economic growth, and most suggest sooner. Natural gas supplies are harder to predict but might not be too different from oil. Amongst the world authorities on these estimates are Cutler Cleveland and Robert Kaufmann, Director and Associate Professor of the Boston University Center for Energy and the Environment, who acknowledged the difficulty in validating the data from the major oil producing regions of the Middle East. See, also, [Rickover, 1957].

Thus, it is important to understand that there are many scientific, environmental, economic and political reasons for minimizing energy usage and waste, over the foreseeable time. There is a substantial probability of excessiveness, unreasonableness and capricious environmental harm unless the NEPA process includes a rational methodology for determining the preferred option contributing to the least predictive injury. Resource planning using analyzes, studies, assessments and evaluations afford a community the predictive opportunity to contemplate options preventing irretrievable and irreversible commitments of resources and environmental abuse. Historical resource planning has primarily concerned corrective considerations.

Life-cycle studies can be used as a means to identify and select the most efficient alternatives in order to reduce consumption of resources and lower the environmental impact in existing electricity generation and distribution systems. Comparative energy consumption assessments for the expected life of alternatives (i.e., a/k/a life-cycle energy consumption or embodied or accumulated energy consumption) provide the best scientific basis to use resource planning for selecting the preferred alternative. Without energy computations for the estimated life of buildings and structures, the NEPA process becomes quite irrational, unscientific and arbitrary. In my opinion, the CG runs the significant risk of unplanned, but preventable, pollution,

impairment or destruction of natural resources. Embodied (accumulated) energy is the total quantity of energy required to manufacture, and supply to the point of use, a product, material or service and disposal. It includes the energy expended from cradle to grave for: extracting raw materials; transporting, manufacturing, assembling and installing a specific material to produce a service or product and finally its disassembly, deconstruction and/or decomposition.

When evaluating the Museum, the USCG should perform and provide a life cycle energy analysis for the overpass and each of the Museum options for the purpose of selecting the alternative requiring the least energy expenditure and producing the least GHGs. Such analysis should include calculations of all embodied energy requirements used in construction materials, fabrication and manufacturing of components, maintenance and repair of the facility and ancillary work during its useful life, viz. cradle-to-grave. The analysis should, also, include the total fuel cycle energy required over the projected useful life of the facility. The boundary for both the energy calculations of the fuel cycle and materials for the facility construction and maintenance shall both be at the point of primary material extraction and include the energy consumed through the entire supply chain to final, but not be limited to, such subsequent steps as transportation, refinement and energy for delivery to the end consumer. For purposes of this paragraph, "facility energy" means the heat energy delivered by the facility contained in a fuel minus the life cycle energy used to produce the facility. "Fuel energy" means the heat energy contained in a fuel minus the energy used to extract the fuel from the environment, refine it to a socially useful state and deliver it to consumers, and "embodied energy" means the total energy used to build and maintain a process, expressed in calorie equivalents of one type of energy.

Life cycle assessment means the comprehensive examination of a product's environmental and economic aspects and potential impacts throughout its lifetime, including raw material extraction, transportation, manufacturing, use, and disposal."

Consider the life cycle steps requiring energy at each step to produce a simple pencil.¹⁸

¹⁸ The standard pencil begins when a cedar tree is cut down. Ropes and gear tug it onto the bed of a truck or a rail car.

Think of all the numberless people and skills involved in mining ore to produce steel and refine the steel into saws, axes and motors.

Think of all the people who grow hemp, then transform it, through various stages, into a strong rope.

Think of the untold thousands of people who produce the coffee the loggers drink!

The logs are shipped to a mill and cut into slats. The slats are kiln-dried, tinted, waxed, then, kiln-dried again.

How many skills were needed to produce the tint and the kilns. What about electric power? What about the belts, motors and other parts at the mill?

The pencil slats are shipped to a factory. A complex machine cuts grooves into each. A second machine lays lead into every other slat. Glue is applied. Two slats are sealed together as one, then, cut into lengths that form pencils.

In his Presidential Executive Order entitled, *Federal Leadership in Environmental, Energy, and Economic Performance*, the President declared that the goals for all federal agencies is “[t]o establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions a priority for Federal agencies. . . .” Exec. Or. 13514, 74 Fed. Reg. 52117 (October 8, 2009)

In Section 2(f)(iv) of E.O. 13514, the President declared that it is the goal of all federal agencies to advance regional and local integrated planning by:

“identifying and analyzing impacts from energy usage and alternative energy sources in all Environmental Impact Statements and Environmental Assessments for proposals for new or expanded Federal facilities under the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 *et seq.*)”

The USCG needs to provide analysis of average distance traveled and energy consumed for the traveling public to the Museum from various places of departure around the country.” The Association projects about 800,000 visitors per year while the 2006 EA projected only 200,000.

The NEPA and CMTINST require the EA to look beyond the immediate site and building and to examine the entire life cycle of energy consumption and production of GHGs. A building cannot truly be called sustainable if its whole life cycle lacks sustainability. The owner of a building does not live up to modern environmental codes

The lead alone is complex; it's not really lead. To produce it, graphite is mined in Ceylon. The graphite is, packed and shipped, then mixed with clay from Mississippi. It is treated with wetting 'agents — such as sulfonated tallow, which is formed when animal fats chemically react with sulfuric acid.

The pencil receives six coats of lacquer. Lacquer has numerous ingredients,' including castor oil. Think of all the chemists needed to create the paint — think of all the castor bean growers needed to produce, refine and ship the oil.

The brass end that holds the eraser in place is a marvel. Miners need to first extract zinc and copper from the earth. Experts transform those materials into sheet brass, which is then cut, stamped and affixed to the pencil.

That brings us to the eraser. It is made from "factice," a rubber-like product that is produced by rapeseed oil from the Dutch East Indies reacting with sulfur chloride.

To be sure, an awe-inspiring amount of work goes into producing a pencil. Millions of people collaborate to produce it — millions ply their unique trades and skills — yet they have no idea they are collaborating.

Each is merely changing his small piece of know-how for the money he needs to buy the goods and services he wants.

More amazing is this: No one person is capable of making a pencil. Not even the president of the pencil company.

No one person could possibly manage the millions of people — and the millions of decisions they make — who produce the ingredients that become a pencil.

Despite the absence of a mastermind, billions of pencils are made every year. They're produced with such humdrum efficiency that every one of us takes pencils for granted. It is a folly for any, man, or group of men, to think of producing something as incredibly complex as a pencil. How much harder must it be to produce a car — one that consumers will want to buy, anyhow?

of conduct without optimizing environmental protection in the whole chain upstream and downstream. Life-cycle studies contribute to a good platform for dialogue where different set of values and interests can be made clear.

2. Strategic Sustainability Performance Plan

Section 8 of E.O. 13514 requires that “each agency . . . develop, implement, and annually update an integrated Strategic Sustainability Performance Plan that will prioritize agency actions based on lifecycle return on investment. . . .” Each such Plan and update is subject to approval by the Office of Management and Budget Director under section 4 of the order with respect to the period beginning in fiscal year 2011 and continuing through the end of fiscal year 2021.

The EA should address this Plan in the consideration of alternatives for energy sustainability as an environmental factor. The USCG should provide the Plan prior to commencing the EA.

3. Earthquakes

It is my professional opinion, as set forth below, constitute a potential significant impact. The SEA needs to assess the potential for damage from earthquakes to the Museum. While the possibility of an earthquake seems remote in the New England region, it has the same vulnerability according to the Connecticut Department of Emergency Management and Homeland Security, Earthquakes The DEMHS Advisor, Volume 3, issue 6, April 2007:

“The eastern half of the United States does not have as high a frequency of earthquakes as California and Japan, but this part of New England has had many history making tremors. The first recorded event in the New World was related to traders by the Native Americans already here. They said it happened in the vicinity of Moodus, CT, in 1568”;

“All that survives of the story is a tale of mass destruction of campsites and violent vertical shaking motion of the ground. Sermons are recorded from a service held in the town of Hampton, New Hampshire on October 29, 1727. They speak of the "terrible day of trouble" that happened the day before as a severe quake sounding like "thunder and lightening" rocked the village. The event created fissures in earth and buildings still visible today”;

“New England has the oldest record of earthquakes in the United States. The earliest settlers learned of seismic activity in this area, dating back to 1568, from the native Indians. This probably happened in the Moodus area. This area is still very active today. Almost 50% of all seismic activity in Connecticut since 1729

has occurred in the Moodus region. Tremors have been felt across the state for a long time”;

“Connecticut is considered to be a Moderate seismic risk zone as defined by the Federal Emergency Management Agency. However, ‘Moderate’ relates to the fact that earthquakes in the state have a relatively long reoccurrence interval and not that the earthquake magnitudes or impact on the population will necessarily be moderate”;

“Connecticut has a population density that is 3.5 times greater than California's and has a hard base rock that transmits seismic waves over a large area much more efficiently. These facts place more people at greater risk since the built environment in this region is predominantly old, unreinforced masonry or is not seismically designed. The majority of these "mill" structures are amazingly strong and stiff for the normal vertical loads they were built to carry. In spite of this, brick is brittle material. Masonry walls will not fare well against the horizontal forces of an earthquake if it is not reinforced or braced in some way” and

“The chances that a damaging earthquake of magnitude 5.0 or greater will occur within the state in any one year are 1 in 20. The odds of an earthquake of magnitude 6.0 here are about 1 in 300 annually. By the year 2010, the accumulated probability for a magnitude 6.0 earthquake will have reached 85%. The Connecticut Earthquake Program is charged with the mission of earthquake risk management, i.e. reducing fatalities, injuries, and property damage resulting from an earthquake in Connecticut.”

4. Floodplain Management

It is my professional opinion that the 500 year (0.2% annual recurrence) storm event may potentially cause significant damage to Museum property.

The selected site is at sea level and located in a floodplain, the area hard hit by the infamous 1938 hurricane. Photographs after the 38 hurricane depict significant damage at the Museum site.

As the planet warms and the seas rise, severe storms are expected to become even more destructive. A 1938-type hurricane will surely come again to this vulnerable area. It now appears that statutory and regulatory restrictions imposed under CCMA and the Federal Emergency Management Agency should prohibit building the Museum in the proposed location. Since the location is in the Velocity Zone on the Federal Insurance Rate Map for New London, the structure must be raised on pilings to allow for storm tides and breaking waves. Also, the building cannot extend into the Thames River beyond the Mean High Water Mark.

Presidential Executive Order 13690 of January 30, 2015 (establishing a federal flood risk management standard and a process for further soliciting and considering stakeholder input) amended E.O. 11988 issued on May 24, 1977 (Floodplain Management).

“It is the policy of the United States to improve the resilience of communities and Federal assets against the impacts of flooding. These impacts are anticipated to increase over time due to the effects of climate change and other threats. Losses caused by flooding affect the environment, our economic prosperity, and public health and safety, each of which affects our national security.

The Federal Government must take action, informed by the best-available and actionable science, to improve the Nation's preparedness and resilience against flooding. Executive Order 11988 of May 24, 1977 (Floodplain Management), requires executive departments and agencies (agencies) to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. . . . Incorporating this Standard will ensure that agencies expand management from the current base flood level to a higher vertical elevation and corresponding horizontal floodplain to address current and future flood risk and ensure that projects funded with taxpayer dollars last as long as intended. (Emphasis added)

(E.O 13690, Section 1. Policy, Jan. 30, 2015)

5. Traffic

It is my professional opinion that added traffic attributed to the Museum will constitute a significant impact to current traffic at the location.

The railroad site is cramped - only one-third acre with no room for expansion. Traffic congestion in that area is terrible now, but an influx of possibly 200,000 to 1 million visitors per year - according to CG estimates - traveling mostly by car would cause gridlock on an unprecedented scale for the downtown, which already acts as a chokepoint to downtown traffic.

6. Air Pollution

The SEA should project the quantity of air pollutants from the number of anticipated visitors to the Museum using different modes of transportation.

7. Feasible and Prudent Alternatives

The USCG should evaluate alternatives in the SEA, including the No Action Alternative and the above-described Proposed Action. The USCG should consider other reasonable alternatives identified during the public scoping process, e.g. Fort Trumbull and VCGM. The SEA should describe the need for the project, the alternatives, and the environmental impacts of the alternatives. The SEA should, also, contain a comparative analysis of the alternatives, a statement of the environmental significance / insignificance of the impacts expected from the alternatives, and a list of the agencies and persons consulted during the SEA preparation. I anticipate that the downtown site will be the preferred location upon its confirmation in the SEA.

(1) No Build Alternative.

(a) *Virtual Museum.* The feasible and prudent alternative of creating, operating and maintaining a Virtual CG Museum at the Academy over the Internet similar to the United State Naval Academy Museum and other museums on the world wide web to display the Academy's and Forrestville artifacts. A Google search for "virtual museums" revealed 317,000 +results; this clearly demonstrates the global trend towards Internet museums in 3-dimensional holographic imagery displayed to the entire world thereby eliminating the need for energy waste from transportation and buildings.

Elaborating further on a USCG Virtual Museum, the U.S. Air Force Museum at Wright-Patterson Air Force Base displays all its artifacts on the Internet. The Maritime Museum at Norfolk, Virginia displays its artifacts on the Internet and the Mystic Seaport Museum, Mystic, Connecticut displays its artifacts on the Internet. The benefits are obvious and the current virtual museums attract and will potentially attract far more corporate sponsors than fund raising for excessively costly anachronistic museum architecture more suitable to bygone eras.

It's time for the USCG to develop its **Museum of the 21st Century for the World** instead of, not in addition, physical structures. Perhaps, the USCG's leadership can reinvent its focus to look forward and think outside-of-the-box. A helicopter whose windows will be outfitted with virtual-reality screens will recreate storm conditions under which the USCG rescues imperiled boaters. The USCG can show the same reality by selling helicopter simulation games or presenting it on the Internet without the need for a building. Such museum would include cable television and satellite stations for displaying and interpreting the artifacts; and

(b) *No pedestrian Overpass.* Neither the USCG nor its supporters have demonstrated a public safety for such a walkway. Approximately four (4) years ago, New London electors voted against such infrastructure using federal funds. How is the city, which has a historical record of extremely poor maintenance, going to maintain a

pedestrian overpass with an elevator when it can't maintain city hall, a former city owned parking garage on Governor Winthrop Boulevard, and the existing overpass over Water Street west of the railroad station?

(2) Build Alternatives.

(a) The alternative of purchasing the railroad station for the Museum with a parking garage across the street and berthing for the Barque Eagle. [Collins 2013]. This suggestion appeared in my 2007 comments on the EA for Fort Trumbull, and the USCG has previously omitted its consideration;

(b) The alternative of siting the Museum on the 419-acre former Norwich State Hospital now owned by the towns of Preston and Norwich, which meets all the statutory requirements;

(c) The alternative is to site the facility at Fort Trumbull State Park as recommended in the Master Facilities Plan, 2006 - 2007 feasibility studies, USCG selection committee recommendation, and the DEP recommendations.

IX. CONNECTICUT COASTAL MANAGEMENT ACT

Section 307(c)(1) of the Coastal Zone Management Act of 1972 ("CZMA"), as amended, Subpart C of 15 Code of Federal Regulations (CFR) Part 930, and Section II, Part VII(c) of the State of Connecticut Coastal Management Program and Final Environmental Impact Statement requires consistency with the CZMA as implemented by Connecticut's Coastal Management Act ("CCMA"), which is cited as Section 22a-92 *et seq.* of the Connecticut General Statutes ("G.S.").

A. Impacts on Historic Coastal Views and Vistas

Based on the below, it is my professional opinion that the Museum would constitute a significant adverse impact on historic views and vista from its grotesque modernist design, which is uncharacteristic of the neighborhood and its history.

The buildings on Bank Street are historically significant and part of a combined Downtown New London Register District on the National Register of Historic Places.¹⁹ The buildings constitute much of the downtown with individual buildings serving as contributing parts of the whole. Nowhere is New London's maritime heritage more evident than on Bank Street, named for the bank of the Thames River.

By adversely impacting the district's historic fabric, the Museum would likely contribute to future depreciation in the value of the buildings in the district.

Bank Street buildings are the same buildings that 19th century whalers saw when they sailed into port. Without that streetscape, Whaling City pride is just window dressing. Those Bank Street buildings are the windows. The Museum would forever diminish the integrity of downtown.

The scenic coastal views and vistas from both sides of the Thames River are considered in the public domain. The railroad station, designed by Henry Hobson Richardson, is on the National Historic Register as well as other buildings including the Superior Court on Huntington Street with a view from Groton. The architectural flavor of surrounding buildings except the city's parking garage is historic New London dating from Colonial times. The Museum's architectural features will block or degrade critical views and vistas; its impact will be an abomination of the historic structures contrary to the CCMA. It is the equivalent of trying to put "two pounds of sausage in a one pound bag."

¹⁹ The Historic District is comprised of the following streetscape: State Street, Golden Street, Pearl Street, Starr Street, Tilley Street, Methodist Street (South Side), River Front and Railroad Right of Way, Railroad Station to Spar Yard including 2 – 280 Bank Street, 11 Blinman Street and Firehouse (West Side), 51 – 73 Eugene O'Neill Drive (East Side), Green Street, Union Street from Pearl Street through Union Street Mall, including 40 - 74 Washington Street (East Side), and 49 - 53 Washington Street (West Side).

“ `Adverse impacts on coastal resources’ include but are not limited to: degrading visual quality through significant alteration of the natural features of vistas and viewpoints.” Section 22a-93(15)(F), G.S.

Visual impact assessment provides a process and standards for objective evaluation – thereby removing much of the subjectivity from the decision-making process and making the results more predictable.

Landscape impacts are defined as changes in “the character and quality of the landscape as a result of development”. Consequently, a **landscape impact assessment** evaluates:

- Direct impacts from specific landscape elements;
- More subtle, or indirect, effects on the overall pattern of elements that shapes landscape character; and
- Impacts on generally accepted special interests or values such as designated landscapes or scenic views, conservation areas, public lands, and historic and cultural sites.

Visual impacts are a sub-set of landscapes. They relate solely to changes in views of the landscape and the resultant effects of those changes on people. Visual impact assessments address:

- The direct impacts of the proposed changes on views of the landscape due to intrusion or obstruction;
- The reaction of viewers who may be affected; and
- The overall impact on the view (which may range from degradation to enhancement).

Visual impact analyses grow from comparisons between existing settings and proposed changes. This allows individuals to evaluate how much change a landscape can absorb. (Richard Smardon 1987, 1988) has developed a system of visual analysis based on the elements of landscape compatibility, scale contrast, and spatial dominance. The steps in the process of landscape and visual impact assessment are very similar to those involved in the environmental assessment process as a whole.

For the analysis, a large and diverse group of people are provided with a series of images showing the existing landscape and how it would be affected by the proposed change as seen from a series of perspectives. The visual image of the constructed project within the landscape may be developed from computer-enhanced images or architectural renderings. Experience with visual impact assessments show that, when shown images of shorelines in various stages or types of development, the majority of people select the same image as being aesthetically preferable—suggesting that results from such a process can be considered reliable and repeatable.

Renderings of proposed structures or landscapes are common tools of architects. In the past these were drawn by hand, but photo-imaging software is making increasingly sophisticated mock-ups more accessible. Products range from static images of the proposed change to complicated images that allow the viewer to see the virtual structure from a continuous series of perspectives as if walking or “flying” through the landscape.

The critical elements that ensure a fair and valid comparison include:

- Clearly documenting the angle of view for the lens used,
- Noting the distance between the viewpoint and the object,
- Providing the aspect or angle of the viewer,
- Providing the location of the viewpoint from which the picture was taken, and
- Providing a sufficient number of views (generally six to seven) to ensure that the structure is seen in its full context (Smardon, 2003).

A simple technique for visualization is to “draw” in the structure or structures on an existing photograph using a photo-manipulation program such as Adobe Photoshop®.

As a result, the SEA should characterize the vistas and the aesthetic features of the coastal environment and evaluate their values. Next, the SEA should assess the visual impacts from the Museum on the values of such vista features.

Various forms of mitigation are available, the selection of which depends on the existing setting, its “visual character,” plans for the area, and the values of the decision-making body. The generic preferences for coastal structures identified by Smardon (2003) can form a basis on which to overlay state or local standards. Common mitigation measures include:

- Measures to minimize harm should include, but not be limited to reducing visual intrusion and related aesthetic impacts;
- Reducing the length, height and overall size of the Museum;
- Maintaining a minimum distance between structures;
- Encouraging the use of “natural” or “traditional” materials and designs typically found in the specific type of landscape setting;
- Reducing the color or shadow contrast between the proposed structure and the surrounding landscape; or
- Minimizing “visual clutter.”

The use of any of these techniques, or others that evolve during the planning process, will vary widely depending on the nature of the existing landscape and the plans for its future.

B. Water Dependency

Based on the below, it is my professional opinion that locating a nonwater dependent use on a site suitable for a water dependent use constitutes a significant adverse impact on “future water-dependent development opportunities” and “adverse impacts on future water-dependent development opportunities and activities” including but not limited to locating a non-water-dependent use at a site that is physically suited for a water-dependent use for which there is a reasonable demand.

In researching the legislative history of the CCMA, Section 22a-92, G.S. *et seq.*, I reviewed all the public acts since its inception in 1978 and investigated the transcripts of all legislative hearings and General Assembly debates for both houses.

The current version of the CCMA concerning the definition of "*water-dependent uses*" in Section 22a-93(16), G.S. resulted from Public Act 79-535. A copy of the legislative transcript history card, Public Act 79-535, proceedings of the Connecticut House of Representatives on Thursday, May 24, 1979 and Senate on Thursday May 31, 1979 for the 1979 session is available from the State Library. See *22 House Proceedings* 29, pp. 10285-10313.

A museum is not a water dependent use on a site suitable for such use, but, rather a water enhanced use barred by Section 22a-93(16) and (17), G.S. The Museum cannot be made water dependent by attaching marine or tidal facilities to the land occupied by the Museum; the Museum must stand alone as water dependent. The proposed action seeks to expand the nonwater dependent use. The Museum is inconsistent with the enforceable policies of CCMA. See **Attachment (4)**. There is no exemption from the requirement for federal facilities.

“Water enhanced uses” means those uses which do not functionally require direct access to marine or tidal waters but which are enhanced by location in or adjacent to marine or tidal waters, and which may include but are not limited to nonwater based recreational and commercial uses and facilities, multiple family residential uses, hotel, tourist, convention and resort facilities, and other uses which provide general public access to marine or tidal water.” (*22 House Proceedings* 10286.)

The Senate passed P.A. 79-535 without any deviations from the House version and unlike the House, which debated the distinction between "*water-dependent uses*" and "*water-enhanced uses*", it refrained from debate on this issue.

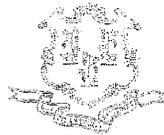
Robert Fromer

Robert Fromer
Environmental Consultant

Attachments: (1) Letter from Governor Malloy to Admiral Papp, 04/17/2003
(2) Connecticut DEP letter to USCG Commandant dated June 6, 2007
(3) Brett Zongker, Associated Press article: 01/04/2014
(4) Letter from John Wronowski, Cross Sound Ferry Service, to Gov.
Malloy, Jan. 26, 2012

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Dannel P. Malloy

GOVERNOR
STATE OF CONNECTICUT

04/17/2013

Admiral Robert J. Papp, Jr.
Commandant, U.S. Coast Guard
USCG Headquarters
2100 2nd St. SW Stop 7000
Washington D.C. 20593-7000

Mr. James J. Coleman, Jr.
President, National Coast Guard Museum Association
321 St. Charles Avenue, 10th Floor
New Orleans, LA 70130

Dear Admiral Papp and Mr. Coleman,

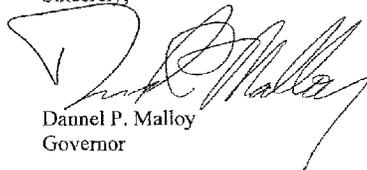
It was an honor to join you on April 5th to celebrate the U.S. Coast Guard's announcement that the National Museum will be built in Connecticut's historic City of New London port. Connecticut is grateful to host this landmark museum, and we look forward to its successful completion.

The Connecticut Office of Military Affairs will be coordinating this effort on my behalf with the Connecticut Departments of Transportation, Economic and Community Development, Energy and Environmental Protection, and other agencies. I have directed the state agencies to collaborate and take the necessary steps to assist the Coast Guard, the National Coast Guard Museum Association, the City of New London, and other stakeholders in ensuring the process goes smoothly and efficiently.

We will be happy to provide the necessary guidance and support to your project managers throughout this project, and your staff is most welcome to contact Bob Ross of the Office of Military Affairs at (860) 270-8074 should they need further assistance.

Connecticut is thrilled to partner with the United States Coast Guard, the National Coast Guard Museum Association and the City of New London to build our newest national landmark. Thank you both for your support and high regard.

Sincerely,

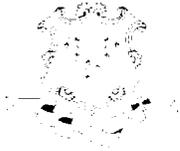


Dannel P. Malloy
Governor

Cc: Hon. Daryl Finizio, Mayor, City of New London
Secretary Ben Barnes, CT Office of Policy and Management
Commissioner James Redeker, CT Department of Transportation
Commissioner Daniel Esty, CT Department of Energy and Environmental Protection
Commissioner Catherine Smith, CT Department of Economic and Community Development

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Attachment (1) to comments of Robert Fromer
dated July 13, 2017



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 6, 2007

Winston E. Leslie
Commandant (CG-092)
Headquarters, U.S. Coast Guard
2100 Second Street SW
Washington, DC 20593

Dear Commandant Leslie:

The Department of Environmental Protection has reviewed the Environmental Assessment prepared for the proposed future acquisition and operation of the new National Coast Guard Museum to be privately constructed in New London, Connecticut. The following comments are submitted for your consideration.

The evaluation of alternative sites for the new museum did not consider the proximity of Parcel 1A, the preferred site, to Fort Trumbull State Park. The Department believes that locating the museum on the Fort Trumbull peninsula would result in benefits to both the park and the museum, providing additional reasons for selection of this site. These benefits include:

- The state park is the site of the original Coast Guard Academy and the Coast Guard is represented in the state park's visitor center exhibits.
- The state park is within easy walking distance of the proposed museum. The connecting sidewalk from the waterfront, by Coast Guard Station New London, meets ADA accessible guidelines.
- There is a common historic focus between the museum and the state park.
- The park has sixteen acres of land that could augment museum events.
- The Coast Guard Barque Eagle uses the pier at the state park during two periods of the year, during which the public is invited to board.
- In early planning for the museum there were discussions about a joint entrance ticket for Fort Trumbull's exhibits and the Coast Guard Museum.

In order to take full advantage of the potential synergy between the museum and state park, it is recommended that the National Coast Guard Museum Association consult with the Department's State Park Division in the design of the facility. Similarly, the U.S. Coast Guard should consult with the State Park Division while planning the programming for the museum. The appropriate contact is Pamela Adams, Director of the State Park Division. She may be reached at (860) 424-3200 or pamela.adams@po.state.ct.us.

Section 5.12.1 concludes that "no construction or operational hazardous and toxic waste impacts are anticipated due to implementation of Alternative 1." Although historic spills and

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
1600 SILVER STAR BLVD., SUITE 100
MIDDLETOWN, CT 06457
TEL: 860-424-3200 FAX: 860-424-3209
WWW.DEP.CT.GOV

leaks have occurred, "all contaminated materials have been successfully removed from the site and disposed of at an appropriate, off-site facility." Various previous site investigations are referenced, including the *Final Remedial Action Report, NUWC - Area A, Parcel F, New London, Connecticut*, dated March 13, 2002 and *Final Interim Soil Remedial Action Report, New London Development Corporation, Fort Trumbull MDP - Phase II, Remediation Area B, New London, Connecticut*, dated July 2, 2002. However, previous remediation activities, in accordance with the Connecticut Remediation Standard Regulations, resulted in soil remaining on-site that exceeds direct exposure criteria. These reports detail steps taken to render these soils inaccessible, as required by the regulations. In order to ensure continued compliance with the Connecticut Remediation Standard Regulations, the New London Development Corporation and/or the developer must submit a Development Remedial Action Plan (RAP) for the Department's review and approval prior to construction.

Portions of Parcel 1A were previously identified as Area B of the Fort Trumbull MDP and Area A, Parcel F of the former Naval Undersea Warfare Center. Specific requirements for the RAP for each of these areas follow.

Area B of the Fort Trumbull MDP - Phase II Remediation Area B

- A groundwater monitoring plan that includes provisions for the remediation of petroleum products.
- A site grading plan that demonstrates all soil will be rendered inaccessible at the conclusion of site development activities. The soil that exceeds the direct exposure criteria (DEC soil) at Area B was covered by a minimum of one foot of soil and must be rendered inaccessible by site development activities.
- A construction soil management plan that will ensure that any soil that exceeds the direct exposure criteria is either rendered inaccessible or properly disposed of at the conclusion of construction activities.
- Provisions and a schedule to record on the land records, an Environmental Land Use Restriction (ELUR) to restrict the exposure of DEC soil that will be rendered inaccessible by site construction. The ELUR will be recorded following the completion of construction.
- Measures to prevent vapor intrusion into the building. This is required because there is the potential for petroleum products floating at the top of the groundwater table.
- Provisions for signs providing notice that remediation is being conducted. Such signs must remain visible until all DEC soil is rendered inaccessible.
- Provisions to ensure that work activities meet all OSHA requirements, including OSHA 40-hour training.
- A contingency plan to address unknown contamination found during construction activities. Such a plan must include provisions to characterize the materials and determine if remedial measures are required.
- Measures to protect existing groundwater monitoring wells and coordinate the data requirements of the groundwater monitoring program with site development.
- Provisions for testing of any fill brought on site is required to demonstrate that the fill is clean.

- Provisions to submit for the Department's written approval a report that documents that the requirements of the RAP are met. This report will must include a draft ELUR for the Department's review and approval.

Former Naval Undersea Warfare Center Area A, Parcel F

- A construction soil management plan that will ensure that any soil that exceeds the direct exposure criteria is either rendered inaccessible or properly disposed of at the conclusion of construction activities.
- A request for a temporary release from the ELUR that is recorded on the land records for the site. This ELUR restricts the exposure of soil that exceeds the direct exposure criteria that is located below a depth of four feet below grade. The construction soil management plan will form the basis of the request for a temporary ELUR release.
- The DEC soil that remains at this parcel was covered with a minimum of four feet of soil. (Section 4.12.1.2 of the ESA incorrectly states that 4 inches of clean fill was placed at this parcel.) A warning fabric was placed as a barrier between the clean soil fill and the DEC soil that remains at the site.
- Measures to prevent vapor intrusion into the building. This is required because there is the potential for petroleum products floating at the top of the groundwater table.
- A post remediation groundwater monitoring plan.
- Provisions to ensure that work activities meet all OSHA requirements, including OSHA 40-hour training.
- A contingency plan to address unknown contamination found during construction activities. Such a plan must include provisions to characterize the materials and determine if remedial measures are required.
- Measures to protect existing groundwater monitoring wells and coordinate the data requirements of the groundwater monitoring program with site development.
- Provisions for testing of any fill brought on site is required to demonstrate that the fill is clean.
- Provisions to submit a report for the Department's written approval that documents that the requirements of the RAP are met. This report will form the basis for the restoration of the ELUR. The ELUR will be restored following the completion of construction.

In addition, an evaluation must be conducted to determine if the site is subject to the requirements of the Property Transfer Act pursuant to Section 22a-134 of the Connecticut General Statutes. If there are any questions regarding RAP requirements or the Property Transfer Act, Peter Hill of the Remediation Division is the appropriate contact. He may be reached at (860) 424-3912 or peter.hill@po.state.ct.us.

Page 5-8 states that "no jurisdictional wetlands or surface waters are located with the project study area. Therefore, no construction-related and/or operational impacts to these water resources would be anticipated." The document does indicate that a detailed site-specific erosion and sedimentation control plan will be implemented to mitigate construction impacts. However, there is no acknowledgement that stormwater runoff from the museum facility could impact water quality of the nearby Thames River or that mitigation or management measures will be implemented.

Traditional stormwater systems collect stormwater as rapidly as possible and quickly shunt it from upland areas to receiving waterbodies. This has resulted in widespread and significant pollution problems from both the materials picked up by the stormwater as it flows over developed land surfaces (non-point source pollution) and, in coastal locations, from the freshwater itself which, even if potable, is a pollutant (by virtue of volume) when introduced into a saline ecosystem. The latest emphasis in stormwater management is to try to minimize changes between pre- and post-development runoff rates and volumes by utilizing on-site retention and to pretreat discharges to remove total suspended solids, oils, greases, nutrients, pathogens and floatable debris.

The Department's typical recommendation for stormwater management follows. For this site, any infiltration of storm water system discharges must be directed away from locations where petroleum products are likely to be present floating at the top of the groundwater table.

Appropriate controls, designed to remove sediment and oil or grease typically found in runoff from parking and driving areas, should be included in any stormwater collection system to be installed or upgraded at the site. Non-structural measures to dissipate and treat runoff are strongly encouraged, including infiltration using pervious paving, sheetflow from uncurbed pavement to vegetated swales, water gardens, or depression storage areas. The Department recommends a stormwater management treatment train approach. Such a system includes a series of stormwater management best management practices (BMPs) that target the anticipated pollutants of concern. For example, parking lot runoff would be expected to contain petroleum hydrocarbons, heavy metals, sediment, organic material (leaves/grass clippings) and seasonally elevated temperatures. Potential structural stormwater BMPs include, but are not limited to, catch basin inserts, gross particle separators, deep sump catch basins fitted with passive skimmers, and/or detention/retention basins having adequate pre-treatment. For larger sites, a combination of structural and non-structural BMPs are typically most effective and practical. If more than 1 acre of pavement drains to a common discharge point, a gross particle separator should also be installed. Advanced designs for gross particle separators have been developed, incorporating cyclonic or swirl technology, that the Department believes are more effective in retaining medium to coarse grained sediments as well as floatables than standard designs. It is recommended that the appropriate variety of this type of unit with a cyclonic design be installed in conjunction with each outfall, depending on the size of the drainage area. Provisions should be made for the periodic maintenance of all stormwater management infrastructure that will be required to insure continued effectiveness of these control measures.

In order to reduce the impact of development and address stormwater quality issues, the Department strongly encourages the use of Low Impact Development measures. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- The use of pervious pavement (which is very compatible for parking lot applications), or impervious pavement without curbs, to promote sheet flow of stormwater runoff,
- The use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs and parking lots),
- The minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,

- If soil conditions permit, the use of dry wells to manage runoff from the building roofs, and
- The installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation.

For additional guidance, consult the *Connecticut Stormwater Quality Manual*. The manual provides guidance on the measures necessary to protect the waters of the state from the adverse impacts of post-construction stormwater runoff. The manual is intended for use as a planning tool and design guidance document by the regulated and regulatory communities involved in stormwater quality management and provides uniform guidance for developers and engineers on the selection, design, construction and maintenance of stormwater Best Management Practices. It includes site planning concepts to reduce or disconnect impervious surfaces in order to reduce or eliminate the need for structural stormwater controls. It also addresses criteria to consider when selecting stormwater treatment practices at a particular site, including effectiveness of particular practices, land use factors, physical/site feasibility factors and downstream resources. The manual is available on-line at:

http://www.ct.gov/dep/cwp/view.asp?a=2721&q=325704&depNav_GID=1654.

Stormwater discharges from construction sites where one or more acres are to be disturbed require a permit pursuant to 40 CFR 122.26. The Permitting & Enforcement Division has issued a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* that will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. For sites where more than 10 acres will be disturbed, the plan must be submitted to the Department. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing stormwater management measures. Another requirement of this permit is that stormwater discharges located less than 500 feet from a tidal wetland must be discharged through a system designed to retain the volume of stormwater runoff generated by 1 inch of rainfall on the site. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and it adheres to the *Connecticut Guidelines for Soil Erosion and Sediment Control*. If no review is conducted by the town or written approval is not provided, the permittee must register with the Department. For further information, contact the division at (860) 424-3018. A copy of the general permit as well as registration forms may be downloaded at: http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324212&depNav_GID=1643#StormwaterConstructionGP.

As noted on page 5-9, a Coastal Site Plan Review will be required in accordance with section 22a-105(c) of the Connecticut Coastal Management Act. The proper management of stormwater to mitigate potential impacts to the Thames River, as discussed above, will be a primary focus of the Department's review of the Coastal Site Plan. If there are any questions concerning consistency with Connecticut Coastal Management Act policies, John Gaucher of the

Commandant Winston E. Leslie

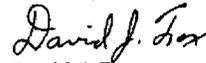
- 6 -

June 6, 2007

Office of Long Island Sound Programs is the appropriate contact. He may be reached at (860) 424-3660 or john.gaucher@po.state.ct.us.

Thank you for the opportunity to review this project. If there are any questions regarding these comments, please contact me at (860) 424-4111 or david.fox@po.state.ct.us.

Sincerely,



David J. Fox

Senior Environmental Analyst
Office of Environmental Review

cc: Robert Kaliszewski, DEP/OPDD
Pamela Adams, DEP/SPD
Rob Clapper, DEP/SPD
John Gaucher, DEP/OLISP
Peter Hill DEP/RD

Smithsonian makes push in 3D imaging of artifacts

By Brett Zongker

Associated Press

POSTED: 01/04/2014 12:00:00 AM PST

WASHINGTON -- With most of its 137 million objects kept behind the scenes or in a faraway museum, the Smithsonian Institution has launched a new 3-D scanning and printing initiative to make more of its massive collection accessible to schools, researchers and the public worldwide.

A small team has begun creating 3-D models of some key objects representing the breadth of the collection at the world's largest museum complex. Some of the first 3-D scans include the Wright brothers' first airplane, Amelia Earhart's flight suit, casts of President Abraham Lincoln's face during the Civil War and a Revolutionary War gunboat. Less familiar objects include a former slave's horn, a missionary's gun from the 1800s and a woolly mammoth fossil from the Ice Age. They are pieces of history some people may hear about but rarely see or touch.

The Smithsonian unveiled its new 3-D viewer online last month with technology from 3-D design firm AutoDesk to give people a closer look at artifacts in their own homes. The data can also be downloaded, recreated with a 3-D printer and used to help illustrate lessons in history, art and science in schools. While some schools might acquire 3-D printers for about \$1,000, other users may examine the models on their computers.

Smithsonian digitization director Gunter Waibel said museums are working to redefine their relationship with audiences to become more interactive.

"Historically, museums have just tried to push data out. It's been a one-way street," he said. "Now museums are really rethinking their relationship with their audience, and they're trying to empower their audiences to help them along whatever learning journey they're on."

TELLING STORIES

With the cost of 3-D scanning and printing equipment declining in recent years, Waibel said there's a new opportunity for museums to transform how they collect, curate and conserve artifacts and also how they educate. Three-dimensional models can help tell stories and create more engaging lessons, he said.

Smithsonian educators are building interactive tours to view 3-D models online. On the Wright Flyer aircraft from 1903, they have created hotspots to help explain its engine and wing design, and users can rotate the object in all directions for a closer look.

With two Lincoln masks, the 3-D viewer allows the user to adjust lighting levels to see the aging of the president's face over the course of the war. And a 3-D scan of a Chinese Buddha statue allows users to examine and unravel a story carved in its surface.

So far, the Smithsonian is devoting about \$350,000 annually to 3-D digitization, with companies also donating equipment. But museum officials are working to raise \$15 million going forward to move the 3-D lab from a suburban warehouse in Maryland to a new innovation center planned for the National Mall. There, the public could see the latest 3-D technology and even make their own 3-D prints of museum objects in a "maker lab."

Within minutes, a 3-D printer can create a plastic replica of an object by reproducing the digital model layer by layer. Other 3-D printers can reproduce objects in fiberglass, stone powder, ceramics, metal, rubber or other materials.

It's not clear how long it will take to create a large 3-D collection. The pace will depend on funding and scaling up techniques the 3-D lab has just begun creating, officials said. For other digitization efforts, the Smithsonian has engaged private partners and may even recruit volunteers to help. In total, the Smithsonian aims to eventually digitize 13 million objects in either 2-D or 3-D.

DIGITAL OUTREACH

Smithsonian Secretary Wayne Clough has made digitization of artifacts a high priority since he arrived in 2008, but only more recently has 3-D scanning and printing become affordable. In an interview, he said museums face a greater challenge than the digitization of documents in libraries or archives because museum artifacts are often three-dimensional.

In a new e-book published last year, Clough called on museums to speed up their work to innovate and digitize collections to make artifacts accessible for a generation born in the Internet age.

A strategic plan in 1927 once called for the Smithsonian to have an office in every state so it could reach more people, though that never came to pass. Now with more digital outreach, the museums could actually realize that dream, Clough said, with the potential to reach billions of people.

"If we look at this issue of reaching people, it's more important than ever before," Clough said, noting that museum visitation among minorities is already low. For museums that received government funding to get their start, he said governments are now saying "what's next?"

"What's next is you have to reach the schools," Clough said. "Your relevance is going to be really based in part on how much you're contributing to the educational process for young people."

While posting data online to easily replicate important artifacts might lead to some attempts to counterfeit objects to sell, Smithsonian officials said the data is provided only for educational and noncommercial use.

"People generally adhere to the terms of use, and we've had very few instances of the public misusing the content or ignoring the terms of use," said spokeswoman Sarah Sulick. "We recognize that new technologies may present new challenges, but we'll watch it carefully and take appropriate action if needed."

AUGMENTED REALITY

Other museums have also started digitizing artworks or making 3-D scans of sculptures. In New York, digital guru Sree Sreenivasan was hired this year as the first chief digital officer at the Metropolitan Museum of Art.

Smithsonian officials said they are making a unique push into scanning a wide variety of 3-D objects, ranging from an ancient whale fossil found in Chile to a 3-D image of a supernova in space.

Some of the latest 3-D technology also could transform the experience of visiting a museum. The Smithsonian is experimenting with new projections of augmented reality with 3-D imagery to help bring dinosaurs or historical figures to life in an exhibit.

"Wouldn't it be great to have Abraham Lincoln walking around talking to people?" Clough said. "It can be done."



Linking Long Island and New England for over 35 Years

January 26, 2017

Hon. Daniel P. Malloy
Governor
State of Connecticut
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Dear Gov. Malloy:

The Director of the National Coast Guard Museum Association, Catherine Cook, recently came to Cross Sound Ferry to present a new alternative plan for the National Coast Guard Museum. The proposal includes an expanded Union Station connected, via a pedestrian bridge over the railroad tracks, to a large annex building that begins on City-owned property and juts out into the Thames River. While we are in favor of a USCG expansion and for a museum at New London, we are adamantly opposed to the current proposed location for the museum.

The plan eliminates our use of land we currently lease from the City that has been used to support waterborne transportation and interstate commerce for decades, abridges our emergency right-of-way, infringes on our riparian water rights, and interferes with the safe navigation of our vessels. Furthermore, it obstructs our own plan for an expanded high-speed ferry service, which has been on public record with the City for years. We believe, as we know you do, that waterborne transportation and shipbuilding and repair should be the primary purpose of New London's deep water port.

Cross Sound Ferry is recognized by the USCG as one of 12 High Capacity Vessel Owners/Operators in the U.S. As a large-scale operator, we are constantly in need of more space. The 1.5 million people and 500,000 vehicles we move annually already tax our limited parcel.

The land we do own was hard earned through various purchases over the past 35 years by members of three generations of my family. In fact, one such purchase granted us the riparian rights over the water onto which the plans call for the museum to be built. We have also leased the piece of property proposed for the museum annex building for over 20 years and have attempted to purchase it outright from the City on two separate occasions. While it may not be a large parcel, it is the last piece of commercial waterfront property available for any future growth of our ferry services.

2 Ferry Street, New London, CT 06320

Phone (860) 443-7394

Fax (888) 440-3492

www.longislandferry.com

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Attachment (4), page 1 to comments of Robert Fromer dated July 13, 2017

Gov. Dannel P. Malloy
January 26, 2012
Page 2

Prior to the downturn in the economy, Cross Sound had proposed a new high-speed/passenger-only ferry terminal with public observation deck along with two fixed piers for the docking of up to four vessels using that property. We currently have high-speed ferry operations to Orient Point, Long Island, Block Island and Montauk from New London. Previous and future destinations include Martha's Vineyard and New York.

In March 2010, ConnDOT released a transportation plan to address the current and future needs at the New London Transportation Center. Among the recommendations were increased accommodations for bus, rail and ferry services to meet the growing demand for transit. Identified in the plan was the need for an overhead pedestrian way to seamlessly connect the 1000 car Water Street parking garage, a new bus terminal, the railroad station and ultimately connect to Cross Sound's ferry terminal facilities.

The State appropriated \$750,000 for the plan that was spearheaded by the Chamber of Commerce of Eastern Connecticut and overseen by the region's COG to address concerns that New London needed to be prepared for an increase in commuter rail service, ferry and bus service and to be able to meet future parking demands. The plan identified the parcel of land in question as part of the region's transportation hub. The proposed museum project stymies any growth opportunities for transportation at that site forever.

Using that piece of land for anything other than transportation not only puts an end to any future expansion of the waterborne component of the Transportation Center but also completely divides the center as it is currently situated. The proposed structure has the serious potential to harm existing ferry operations by obstructing navigation, access to and from the ferry terminals along with blocking the line of sight down the river for departing and returning ferries. There is also an issue with riparian rights along that piece of property.

We want you to know that we value the USCG as a partner and a neighbor in New London. We feel strongly that having the Academy in New London is nothing but a boon for the City and a USCG museum in New London will be a cornerstone attraction for the entire region. However, we cannot support this particular concept as it has been proposed. While there are other suitable and attractive locations for a national USCG museum in New London, the ferry services need to operate and grow at their current location, while enjoying synergies with connecting rail, bus, parking and other transportation amenities.¹

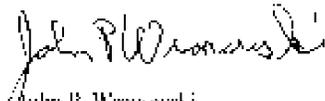
While it appears this concept plan has been circulated for months, we were only made aware of these plans last Friday. We feel the State's and particularly Southeastern Connecticut's transportation needs were not duly considered while this concept plan was being developed. Before proceeding any further with these plans, the future needs of transportation in New London and the region need to be addressed.

¹The New London Transportation Center is one of the only locations in the U.S. where high-speed trains are directly linked with high-speed ferries to multiple destinations. Amtrak Acela Express connects with up to 10 high-speed ferry departures daily during peak periods.

Gov. Daniel P. Malloy
January 26, 2012
Page 3

Gov. Malloy, we have sent along your concerns in a separate letter to Admiral Papp. We appreciate your input in this important issue and thank you for the opportunity to answer any questions.

Sincerely,



John P. Wronowski
Owner/President

Cc: Hon. Andrea Stollman
Hon. Andrew Maynard
Hon. Ernest Hewitt
Hon. Ted Moukawsher
Hon. Elissa Wright
Hon. Tom Reynolds
Jay B. Levin
Mark H. Dowers
Mark Benjamin

Jeanine

2 July 2017

To: Jeanine Gouin , Milone & MacBroom

From: Nancy d'Estang, po 602, Old Mystic, Ct. 06372

Re: Comment regarding the proposed CGM

The 22 June piece in THE DAY, by Julia Bergman regarding public input into the CGM plans, is quite amusing—no--- actually alarming!

Enclosed is the "tip of the iceberg" --- documents, letters, government regulations, the Yale proposal for Fort Trumbull, FEMA data, DEEP regulations, etc., etc., etc. Copies of all of this plus much more textural material, are in the files of the Town, Admiral Sheer, the Ct. Preservation Society, etc. These date back to at least 2013, and include some of the many letters to the DAY editor since that time, to state and federal legislators, regulators, etc. Players MUST study this cache. Surely the public were not expected to repeat over and over and over the intelligent arguments and suggestions which have been made in the past; there was no reason to attend yet another hearing to solicit public input! Your offices will simply have to go through the past files. The PLAYERS not even known---responses to input have been received from only 1 or 2 in years!

At this time, I would like to add these items to the public input:

There have been many myths, lies (yes, indeed the Eagle docks at Fort Trumbull), exaggerations, and some fanciful artistic renderings regarding this museum. There MUST be truth; a scaled model and scaled drawings of proposals, which include the entire waterfront , river, train station, pedestrian bridge, GD, millstone, cargo docks, fishing piers, parking garage, statue, Parade plaza, historic school house, spouting whale, bus station, ferry docks, tall ships piers, and street side: Bank and State Streets, bars, restaurants and amenities. There has never been a discussion of the museum is actual CONTEXT.

The proposals MUST be put to public REFERENDUM---a democratic process, which does not exist. How do the "1 million annual visitors" get to this downtown location? Who pays for all of the infrastructure, amenities, maintenance, emergency vehicles, police, fire fighters, services, oversight , taxes, insurances, legal advisors---everything which will be required to move forward. Where will the displaced residents and small businesses go, which will not be able to carry this financial burden?

See and regard the enclosed packet with just a few of the items from "public input".

Thank you, Nd'



RECEIVED
JUL 12 2017

MILONE AND MACBROOM

10 July 2017

To: Jeanine Gouin, Milone & MacBroom

From: Nancy d'Estang, PO 602, Old Mystic., Ct. 06372

Re: CGM

Please make these additions to my attached letter regarding your seeking public opinion:

1. The spent fuel rod storage at Millstone is another hazard to this already chaotic location at the train station.
2. John Conger, regarding Pentagon planning: "If I'm building an installation, do I build it on a flood plain, or higher ground?...Planning ahead of time, with some forethought, that's what we are doing".
3. Players and the public, looking at the FEMA maps, know that, not only is this location in a flood zone, it is also in a V zone (high wind velocity).
4. Three or four coast guard museums already exist. Fort Trumbull was such a location too. Fort Trumbull is still the logical location, as researched and recommended by the Yale Urban Design group...years ago.
5. Consider inexorable growth at the train station location.
6. Proposal to "create a bulk head...." defies nature, as is repeatedly demonstrated by coastal structures.
7. The public are weary of this illogical plan, benefiting the few.
8. Homeland Security must be rolling their eyes at this plan, having ruled NYC "too vulnerable for LNG storage/transport. NL is safer???"

While these comments are subjective, it must be said that the information given by the players over the past years has often not been objective.

"An elephant on a mouse" is not rational.

June 19, 2017

You will recall that yesterday was cloudy and windy; there were very people in New London, and few tourists, except from the ferries. BUT, I was waiting for a train yesterday and noted these activities at the proposed site:

Ferries arriving at 3:10 and 3:25, passengers walking along the train tracks to municipal parking lot, not the garage.

Ferries departing 3:20 and 3:30. Passengers with luggage et al walking the opposite direction.

Amtrac to NY arriving 3:20

Shoreline East arriving from New Haven 3:25.

Amtrac to Boston 3:30

Traffic backed-up each time a train was due or departing; cars in a line from Bank Street all the way down to the Fishers Island ferry parking. Cars trying to get through from Bank St. filled the pedestrian crossings and the intersections.

Keep in mind this was a quiet day in New London,

What would the visitor to the proposed museum experience: Horns, whistles, bells, dust, traffic jams, idling vehicles, fumes, ill manners, a darkened train station. What would he experience at Fort Trumbull? At least, clean air and a clear view over the water. Would he enjoy this tangle and chaos?

Guy urinating in the doorway of Flo's cafe.

Skate board/rider pulled down the hill at high speed by his dog, maneuvering among luggage, babies in strollers, children skipping along,

18 July 2016

To: New London/Coast Guard Museum leadership

While working on the proposal for the Coast Guard Museum, I trust that you will regard these publications and observations:

President Obama's directive on Flood Management: "The Federal Flood Risk Management Standard, Order 13690". And "Taking Action to Protect Communities and Reduce the Cost of Future Flood Disasters". Both on https://www.whitehouse.gov/administration/eop/ceq/Press_Releases/January_30_2015. (BE SURE TO ADD THE 2015.)

The Federal Flood zone maps at City Hall annex. It is essential to have these accurately interpreted—they are tricky.

The Yale Urban Design's "Fort Trumbull Vision" online. This is a comprehensive, professional proposal for development of income property, public open spaces, and the CGM.

The 2004 Federal designation of New London, Ct. as the home of the future CGM. (No specific site.)

The environmental impact statement regarding the proposed overpass: "NCGM Pedestrian Overpass" which contains these DEEP regulations: 4.9.2 "The downtown New London waterfront has been designated as a Conservation Area...because of its location in a floodplain. [State] Policy: "Discourage new development activities within floodway and floodplain areas...manage UNAVOIDABLE activities". 4.9.3: "State policy promotes long-term NON-INTENSIVE uses for projects within flood hazard areas... Intensive floodplain uses have been interpreted by the DEEP to include ...any INCREASE in square footage of office, retail, industrial, or business uses...."

Judy Benson's report on a CGM meeting, THE DAY, July 8, 2016

Neil Ruenzel's op ed piece in the DAY, July 3, 2016

The Royal Institute of Chartered Surveyors warns: "...proponents of large scale, complex, projects... long time frames, multiple stakeholders.....often oversell the benefits and undersell the costs and time required for the project. Risk management should be emphasized..."

In the case with the CGM, there only recently is some public discussion regarding the flood zone and the V zone; there has been no public discussion of the January 30, 2015, Federal Flood Risk Management Standard; no public discussion of the additional huge infrastructure costs and necessary New London upgrades. The additional millions needed from the Feds only now proposed and revealed.

Professional oversight of this complex undertaking must assure the highest ethical standards—for the environment, for sustainability, for design, for preservation, for a world-class urban plan equally benefitting the entire community—and not least—control of debt and taxes. Who decides when projected debt and taxes are too much?

New London can afford no mistakes. For a light reminder of how bad projects can get, and to remind the players to keep things in budget, in context and historical perspective, see "The Great Exhibitionists" ...attached.

Thank you for due diligence. Nancy d'Estang, PO 602, Old Mystic., Ct.



floodings.

Also participating in the meeting were officials from the state Department of Energy and Environmental Protection, who issue permits for buildings in coastal areas.

"I don't think they ran into anything insurmountable," said Dennis Pinkham, spokesman for FEMA. "We've had other agencies that have had to build in flood plains, that had to change their designs" to comply with the regulations.

Dick Grahn, president of the National Coast Guard Museum Association, said the June 30 meeting was a productive discussion about flood plain regulations, FEMA's concerns about the location on the banks of the Thames River, and technical issues related to how best to comply with the regulations. The parties will meet again by phone July 14 to continue the discussions.

"FEMA wanted to think about how best to advise us," he said. "The upshot is that there's nothing insurmountable."

Pinkham said the regulations for building on a flood plain are developed and administered by the state and the city. Specific requirements are incorporated into the city's building and zoning regulations.

Kirk Kripas, the city's building official, said the occupied portion of the museum would have to be elevated at least 16 feet above the ground — about 1.5 stories high — to comply with the flood plain management regulations.

City zoning regulations also require that sewage and waste disposal systems be elevated above 14 feet, the base elevation of the 100-year flood.

Utility equipment, including furnaces, air conditioners, ventilation and circuit breakers, would also have to be elevated. The ground-level portion of the building would have to be

SEE DISCUSSIONS PAGE A3

ne Page D1

NEW LONDON www.theday.com \$1.00

Downtown site for CG museum seen as being not 'insurmountable'

Building would have to be elevated 16 feet because of flood plain

By JUDY BENSON
Day Staff Writer

New London — The outcome of a recent meeting between the representatives of the National Coast Guard Museum and the Federal Emergency Management Agency has left the door open to building at a site on the downtown waterfront in the federal flood zone.

FEMA and Coast Guard museum officials met last week in Boston to review requirements related to building at the site next to Union Station in the 100-year flood zone, so labeled because it has a 1 percent chance of flooding in a given year.

Discussions on museum site will continue

FROM A1

designed to let flood waters pass through, and utilities and plumbing would have to be flood-proofed, within water-tight walls and a supporting structure that can withstand water pressure of flooding.

Pinkham said the July 14 meeting will be a telephone conference call between FEMA, representatives of the museum association, the Coast Guard and DEEP.

"Discussions will continue on the proposed conceptual design for the museum," he said. "This is a work product meeting" and is not open to the public.

Grahn said the meetings with FEMA are among a series of meetings with agencies including DEEP, the Army Corps of Engineers and the state Historic Preservation Office to learn what requirements

will have to be met to build the museum at the downtown site. The Historic Preservation Office will consider the museum's impact on Union Station, which is on the National Register of Historic Places.

Once details of all the requirements of the various agencies are determined, he said, the architect for the museum will develop a design.

"Then we'll attempt to cost it out," Grahn said. "Once we see what kinds of additional restrictions will be imposed, we'll have a roadmap for the design."

The museum association is hoping to raise more than \$50 million for the project from private sources. Thus far, about \$8 million has been raised, Grahn said.

In addition to the \$8 million, the state has pledged \$20 million for a pedestrian bridge over Water Street that would

be part of the museum project. The museum association is also hoping the federal government will contribute \$25 million toward the building, in addition to \$5 million in federal funds for building exhibits that has received initial congressional approvals.

Grahn said building at a site of less than half an acre — surrounded by railroad tracks, the train station, the Cross Sound Ferry terminals, Water Street and City Pier — will be complicated, but nonetheless doable. He said the museum building will need to be large enough to house at least 60,000 square feet of exhibit space.

"We've been asked by the Coast Guard and the city to build at that site," Grahn said. "There are a lot of moving parts, but we've started to address all of them."

j.benson@theday.com

Don't dismiss museum location critics

By NEIL D. RUENZEL

In Tony Sheridan's guest commentary in the June 26 edition, "Coast Guard Museum site has broad support," we're told the National Coast Guard Museum's location is "settled." Wade Hyslop, in his June 14 commentary, informs the "misguided few" that the debate "is over."

These commentaries suggest that the matter of rising oceans, future hurricanes of the 1938 or Sandy magnitude, the need for permitting by the state environmental agency and approval from the Federal Emergency Management Agency are also "settled."

Having been present a number of years ago at the Fort Trumbull festivities announcing the National Coast Guard Museum, I've been taken aback by the shift to downtown. Some say the Kelo decision gave the Coast Guard cold feet since they didn't want to be tarred with that brush (even though the museum plot had no relationship to Kelo). Then the Coast Guard tried to purchase part of Riverside Park that abuts the Coast Guard Academy as a possible museum site. Nice idea, but New London voters shot that idea down. Shortly thereafter, New London decided they "loved"

the Coast Guard and put up a few window signs in the railroad station saying so. Heartwarming. The next thing we know, a tiny hidden plot of flood plain becomes a terrific idea.

The artist's rendering accompanying Sheridan's letter shows the "glass menagerie" on a somewhat elevated site. Interesting. If we are to accept what the "many talented designers, planners, and engineers" have proposed, one has to ponder how many millions of dollars will be required for site work to build a foundation. Add that to the cost of the pedestrian bridge and you now have an accumulated waste of approximately one-third of the total museum cost. None of this would be necessary at Fort Trumbull.

The argument that ferries, trains, buses, and autos traveling through New London's transportation center will bring multitudes of museum visitors is just plain silly. There's a name for those folks: "Commuters." This argument would assume passengers deplaning at Bradley head for The New England Air Museum. Highly unlikely.

The National Coast Guard Museum Foundation, Council of Governments, and numerous state, local and federal political leaders have dug their heels

in because they've painted themselves into a corner and now don't want to admit their folly. Lately, they've unleashed their Dobermans to scold the many area residents who have questioned the proposed location and to suggest that those who don't go along with their highly suspect plan puts the project in jeopardy.

I'm not without sympathy for downtown merchants and businesses who hope to benefit from the museum, however, they are being sold a bill of goods regarding regional traffic. They've been resilient through decades of magic shows offered up to "save" New London.

I have received dozens of unsolicited comments from fellow retired Coast Guard officers, including those of flag rank, supporting the position outlined in my April 29 letter to The Day.

Not surprisingly, I haven't heard any support for the downtown site. So, as "misguided" as the many people who have voiced opposition are, I would hope the powers that be would stop talking down at us.

Neil D. Ruenzel is the former director of communications for Electric Boat. He lives in East Lyme.

July 3, 2016

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As written by Theodore Bodenwein in his will establishing The Day Trust.

HOW TO WRITE LETTERS TO THE DAY

The Day encourages original letters to the editor not sent to other publications. The writer should limit the length to 200 words and submit no more than one letter every 15 days.

All letters should include the writer's full name, address and telephone number. The Day will edit for clarity, length, grammar, style and taste.

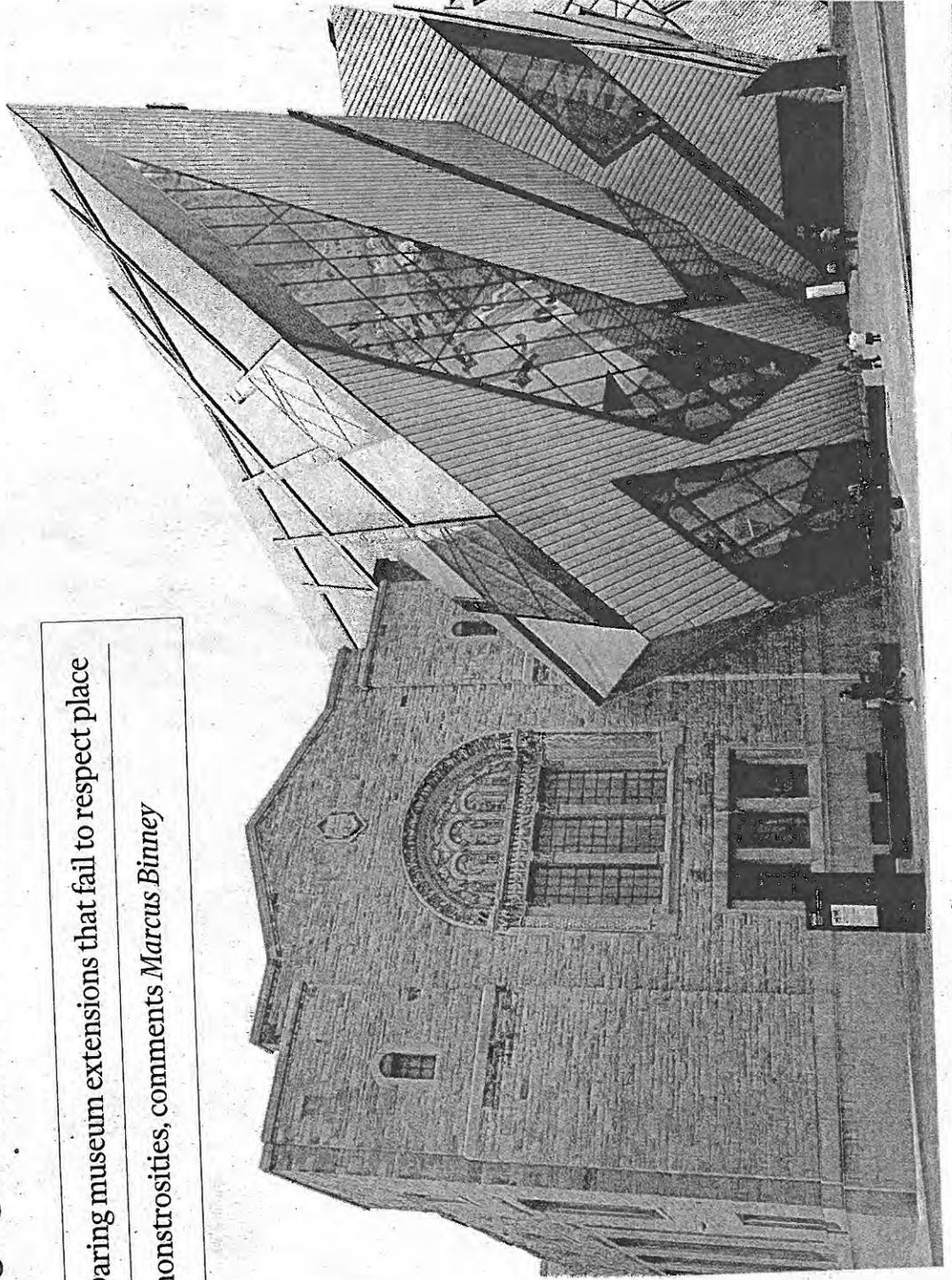
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New London, CT 06320



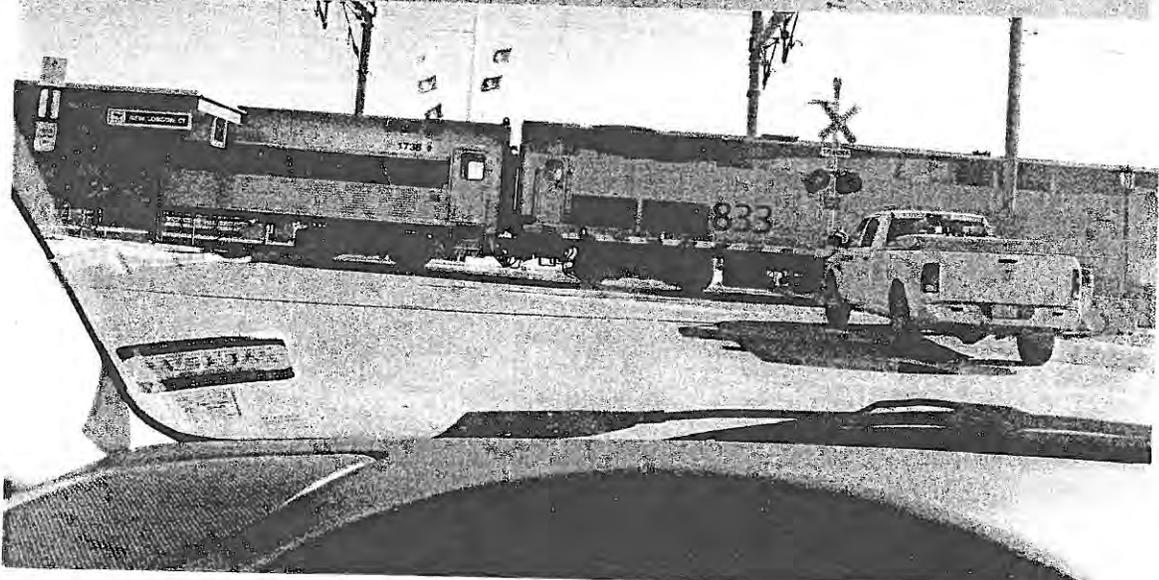
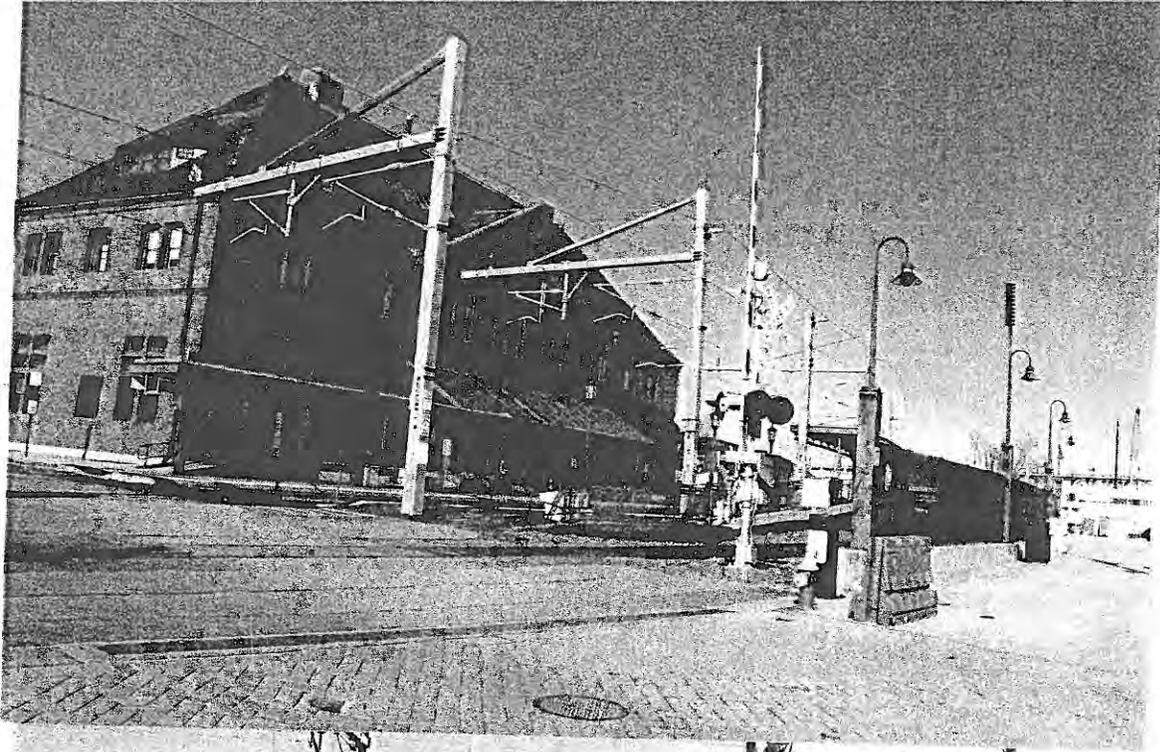
The great exhibitionists

Perspective: architecture | Daring museum extensions that fail to respect place and context can end up as monstrosities, comments *Marcus Binney*





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NEW ENGLAND NEWSPAPER OF THE YEAR

VOL. 135, NO. 336 24 PAGES

Report: State's debt fifth worst

Pension obligations grow more than health care, bonding

By KEITH M. PHANEUF
The Connecticut Mirror

Long recognized as one of the most indebted of states, Connecticut's chief offset against that burden was its tremendous wealth.

But even weighed against personal income, what Connecticut owes to its bondholders and retired public-sector workers ranks as fifth

worst among the states, according to a new analysis by The Pew Charitable Trusts.

The report also found Connecticut followed a national trend between 2003 and 2013 as its pension debt worsened faster than any other long-term obligation, reaching its highest point in a decade.

"Although a number of states have taken steps in recent years to shore up their pension savings or cut costs by modifying benefits — mostly for new workers — unfunded pension obligations are more than

debt or unfunded retiree health care costs," Pew researchers wrote.

The pension crisis is driven by a combination of factors, they added, including lower than expected investment returns and historic underfunding issues.

And while the report only uses data through 2013, it notes that strong investment earnings for many states in 2014 "may have been undercut by weak investment returns" in 2015 and 2016.

An investigation by The Day in 2014 found that retired Connecticut

state employees received the highest annual pensions in the country in 2011, despite contributing less out of their paychecks than the national average.

That meant the state's pension system was the second-most underfunded in the United States, in worse shape than every other state's except Illinois.

Can state afford heavy debt?

With one of the highest per capita incomes of any state, Connecticut is

SEE REPORT PAGE A

Group raises questions about spent radioactive fuel stored at Millstone

By JUDY BENSON
Day Staff Writer

Waterford — Later this year, 75 tons of used radioactive fuel will be moved out of the pool of cooling water where it's been stored for nearly 30 years and into concrete and metal casks that sit on the property of the Millstone Power Station.

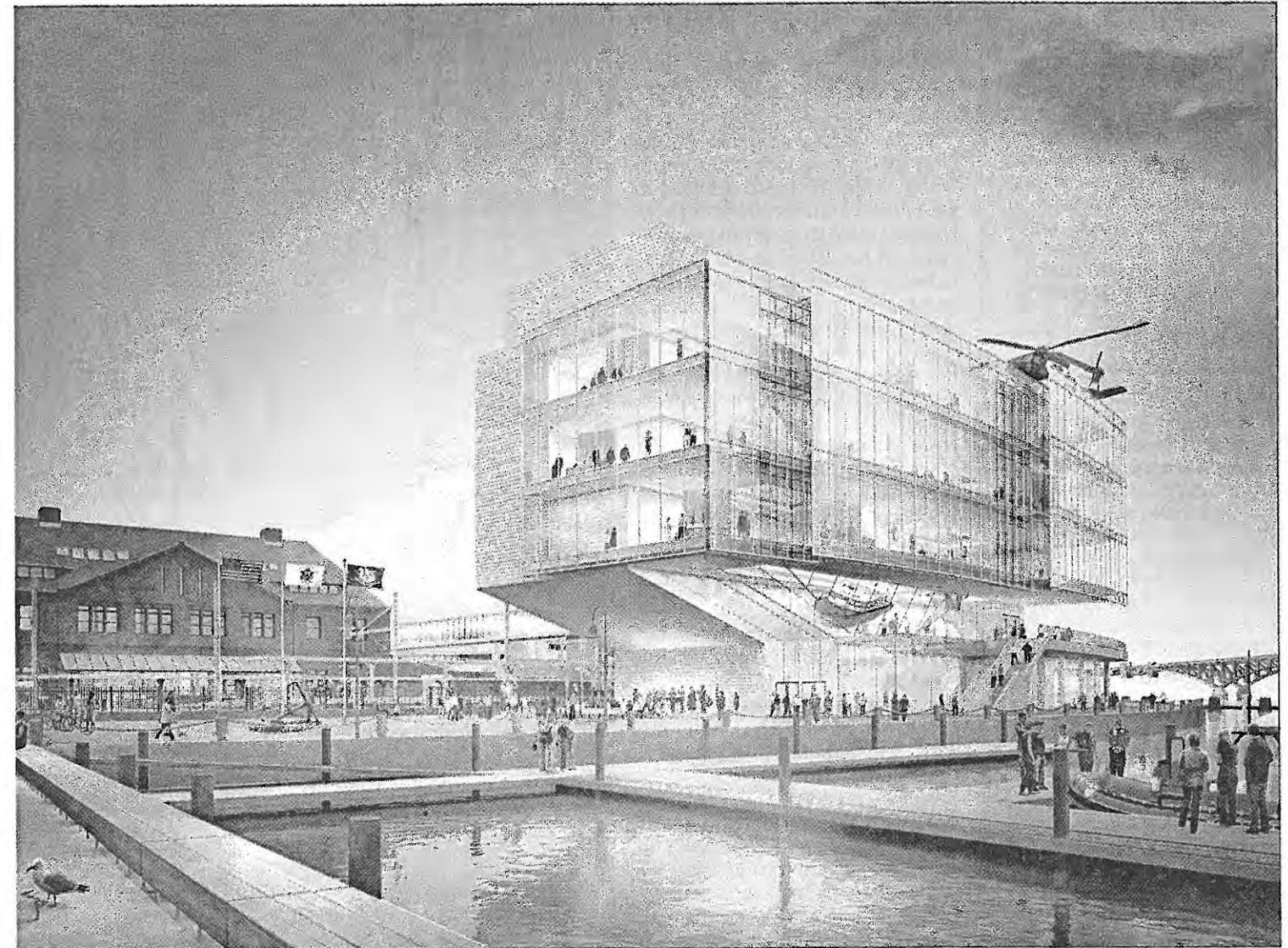
The 75 tons of spent fuel from Millstone Unit 3 will be the first batch of spent fuel to be moved from

stly, however, Jeb Bush's decision to let people who were calamitously wrong as part of his foreign-policy team isn't him, or about the Bush family. It's about a Republican Party that stubbornly refuses to accept that Iraq was a disaster. If I'm correct that Paul doesn't have any real chance of being elected, then that's going to be a problem for any of the viable Republican candidates.

tion, a presidential nominating person."

This isn't specifically about him, though as Bouie notes, it might be the first to follow a president who was widely perceived as a one area (or more). It was a primary Carter in foreign policy

SHAPE OF THINGS TO COME



ed architectural designs of the New Coast Guard Museum in New London released Monday.

RENDERINGS COURTESY OF PAYETTE ARCHITECTS

Museum design is on the rise

st renderings of Coast Guard site show
ling with entrance 13 feet above water

A BERGMAN
f Writer

ondon — The National Coast
Museum Association and the
's lead architect on Monday
d proposed architectural
: that envision a four-story
erched high on the New
waterfront.

The public unveiling at the at the
Garde Arts Center, which several
officials called a milestone in the
development of the estimated \$100
million museum, was cohosted by
the Chamber of Commerce of East-
ern Connecticut and the Southeast-
ern Connecticut Cultural Coalition.
Charles Klee, principal at Bos-

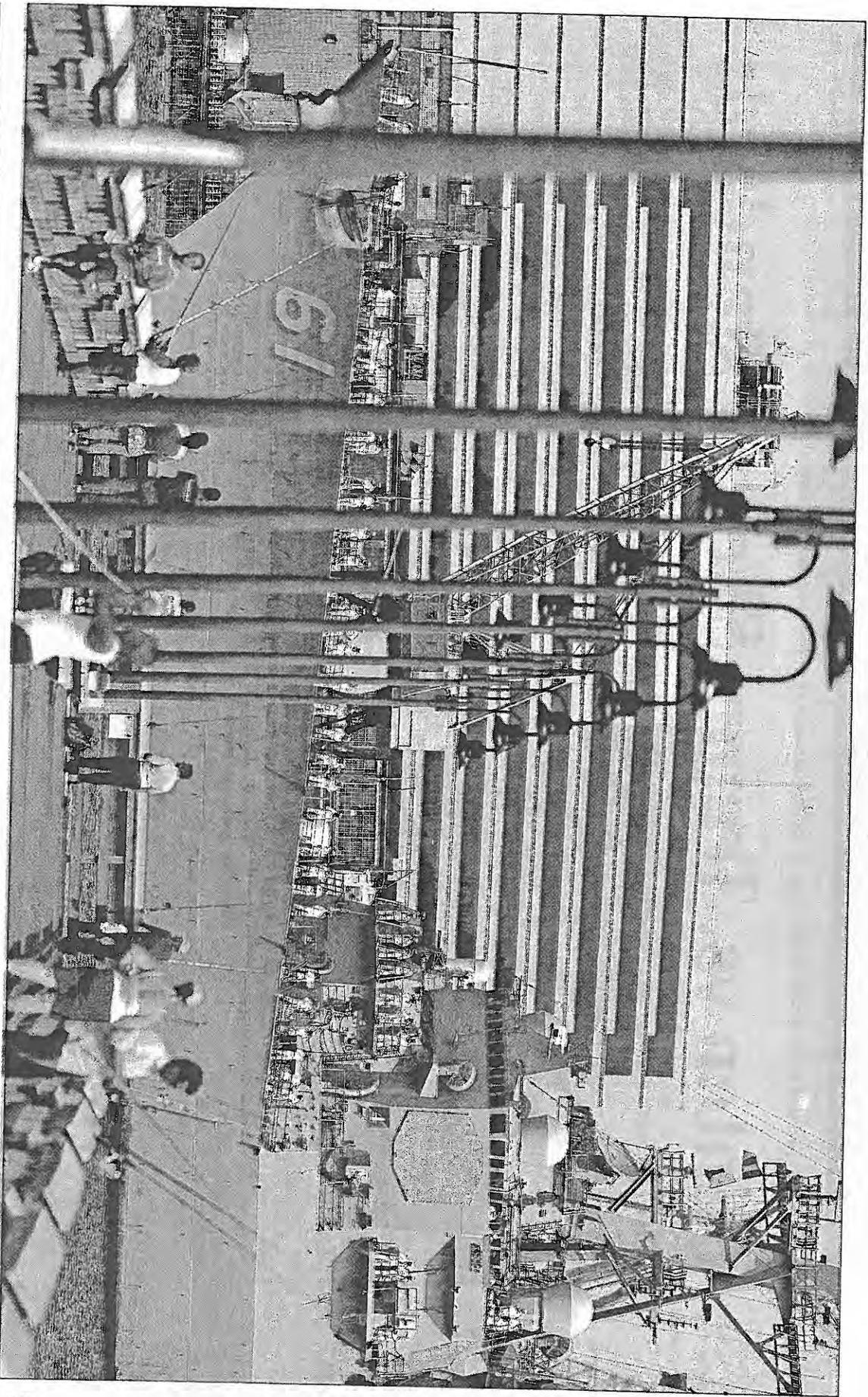
ton-based architecture firm Payette,
and members of the museum associ-
ation stressed that the concept is in
its infancy, and that a forthcoming
environmental review, which will in-
clude public hearings to solicit com-
ment, will ultimately determine the
final design of the museum.

“These are design concepts that
are likely to change dramatical-
ly over the course of the next year,
year-and-a-half, two years as we de-
sign this building,” Klee said.

Those who spoke Monday seemed
set on using the event as evidence
that the museum project is moving
along. Some members of the public
have raised concerns about the site
given its location in a flood plain and
lack of parking in the area, and have
said Fort Trumbull would be a more
viable option.

Museum association CEO Dick
Grahm pointed to a collaboration
among stakeholders “that really has
SEE COAST PAGE A3

DESTROYER DÉJÀ VU



The destroyer USS Truxtun (DDG-61) passes through the fishing pier on Thursday en route to dock at the Trumbull State Pier in New London. The Arleigh Burke-class guided missile destroyer will be off to the pier for tours this weekend part of the Connecticut Maritime Heritage Festival. The Ramage is of the San Antonio class as the USS Truxtun which departed Wednesday after a brief stopover to ride out the storm Hermine.

SEAN D. ELLIOTT
THE DAY

Now adults, children of the

Tammy's defense fund

Federal Flood Risk Management Standard

16 July 2016 | 18:27 | 20 KB

From:

Roxanneandr <roxanneandr@aim.com>

To:

d'Estang <napa@le-voila.fr>

Load external images

In the Fact Sheet, this document was referenced:

Federal Flood Risk Management Standard (FFRMS)

The purpose of this page is to provide information and materials related to the President's Executive Order 13690, "The Federal Flood Risk Management Standard" for federal agencies.

BACKGROUND: On January 30, 2015, the President signed Executive Order (E.O.) 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input, which amended E.O. 11988, Floodplain Management, issued in 1977. Consistent with the President's direction, the Federal Emergency Management Agency (FEMA), as Chair of the Mitigation Framework Leadership Group, published for public comment in the Federal Register Draft Guidelines to provide guidance to agencies on the implementation of Executive Orders 13690 and 11988 (80 FR 6530, February 5, 2015). After an extension, the public comment period lasted 90 days, during which FEMA and other members of the Mitigation Framework Leadership Group held eight in-person public listening sessions across the country and one public webinar, to ensure input from stakeholders and the public. The Mitigation Framework Leadership Group has considered stakeholder input and has provided the Water Resources Council with recommendations.

The Mitigation Framework Leadership Group developed the *Comment Response Document* which summarized and responded to input received from stakeholders during the open comment period for the *Draft Guidelines for Implementing Executive Order 11988, Floodplain Management, and Executive Order 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input dated January 28, 2015.*

The Comment Response Document provides an overview of the comments received and a summary of major themes that emerged from these comments. Within each theme, there are questions (in bold) that capture key concerns followed by further explanation of the issue and/ the response to the question or comment. Where appropriate, the response includes an explanation of any changes to the Guidelines (*italicized text*).

FEMA, the U.S. Army Corps of Engineers, and Housing and Urban Development (HUD) have produced fact sheets in response to several frequently asked questions regarding the intended scope of the President's Federal Flood Risk Management Standard (FFRMS) and the anticipated impacts to many of the programs of these agencies.

- The [Applicability of Executive Order 136090 Fact Sheet](#) responds to several frequently asked questions regarding the intended scope of the President's *FFRMS* and the potential impacts to the National Flood Insurance Program (NFIP).

- The U.S. Army Corps of Engineers produced [talking points](#) and a fact sheet, [Applicability of Floodplain Management and FFRMS Executive Orders to USACE Permitting Authorities](#), in response to questions about Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act.

- [HUD's Implementation of E.O. 13690 and the Federal Flood Risk Management Standard](#) addresses the application of the FFRMS to single-family home mortgages for acquisition or refinancing of existing homes under the Federal Housing Administration or any other programs.

All sections collapsed. [Click to expand all sections](#) [Expand All Sections](#)

[This Section is Collapsed. Click to Expand](#) **An Introduction To The Federal Flood Risk Management Standard ("Standard")**

[This Section is Collapsed. Click to Expand](#) **Open Comment Until 12/17/15:
FEMA's Implementation Of The Federal Flood Risk Management Standard**

[This Section is Collapsed. Click to Expand](#) **Listening Sessions**

[This Section is Collapsed. Click to Expand](#) **Mitigation Framework Leadership Group**

[This Section is Collapsed. Click to Expand](#) **Documents**

Last Updated: 11/19/2015 - 08:14

Fact sheet

16 July 2016 | 18:21 | 20 KB

From:

Roxanneandrx <roxanneandrx@aim.com>

To:

d'Estang <napa@le-voila.fr>

Dear love, here is the entire Fact Sheet. He meant, be sure to capture the entire date, January_30_2015 in his link , though it doesn't appear in blue so one has to take care to include the last four digits

https://www.whitehouse.gov/administration/eop/ceq/Press_Releases/January_30_2015

FACT SHEET: Taking Action to Protect Communities and Reduce the Cost of Future Flood Disasters

Across the country, extreme weather and other impacts of climate change are threatening the health, safety, and prosperity of our communities. This month, NOAA and NASA announced that 2014 was the hottest global year on record. And as the planet continues to warm, impacts like rising sea levels, intensified storms, and heavy downpours are contributing to an increased risk of flooding. President Obama is committed to ensuring that American communities thrive in the face of a changing climate. That is why, today, the President signed an Executive Order establishing a flood standard that will reduce the risk and cost of future flood disasters by requiring all Federal investments in and affecting floodplains to meet higher flood risk standards. By requiring that Federally funded buildings, roads and other infrastructure are constructed to better withstand the impacts of flooding, the President's action will support the thousands of communities that have strengthened their local floodplain management codes and standards, and will help ensure Federal projects last as long as intended.

This new Federal Flood Risk Management Standard, called for by the President's State, Local and Tribal Task Force on Climate Preparedness and Resilience, builds on the unprecedented actions President Obama has taken to support communities as they prepare for the impacts of climate change. Agencies will have flexibility in implementing the new Standard and will incorporate input from the public and stakeholders as they move forward, including through a series of public listening sessions across the country. This week, the Army Corps of Engineers released a comprehensive study that evaluates flood risks to the coastal areas affected by Hurricane Sandy and provides a framework to help communities address increasing flood risks. The study, which was called for by Congress, emphasizes the importance of improved planning, and notes that managing coastal storm risk is a shared responsibility by all levels of government. The Administration has made significant investments in resilient disaster recovery in the wake of devastating storms like Hurricane Sandy to ensure that infrastructure projects factor in climate impacts like rising sea levels, and to invest in making transit systems more resilient to flooding and extreme weather.

Flood Impacts on Communities

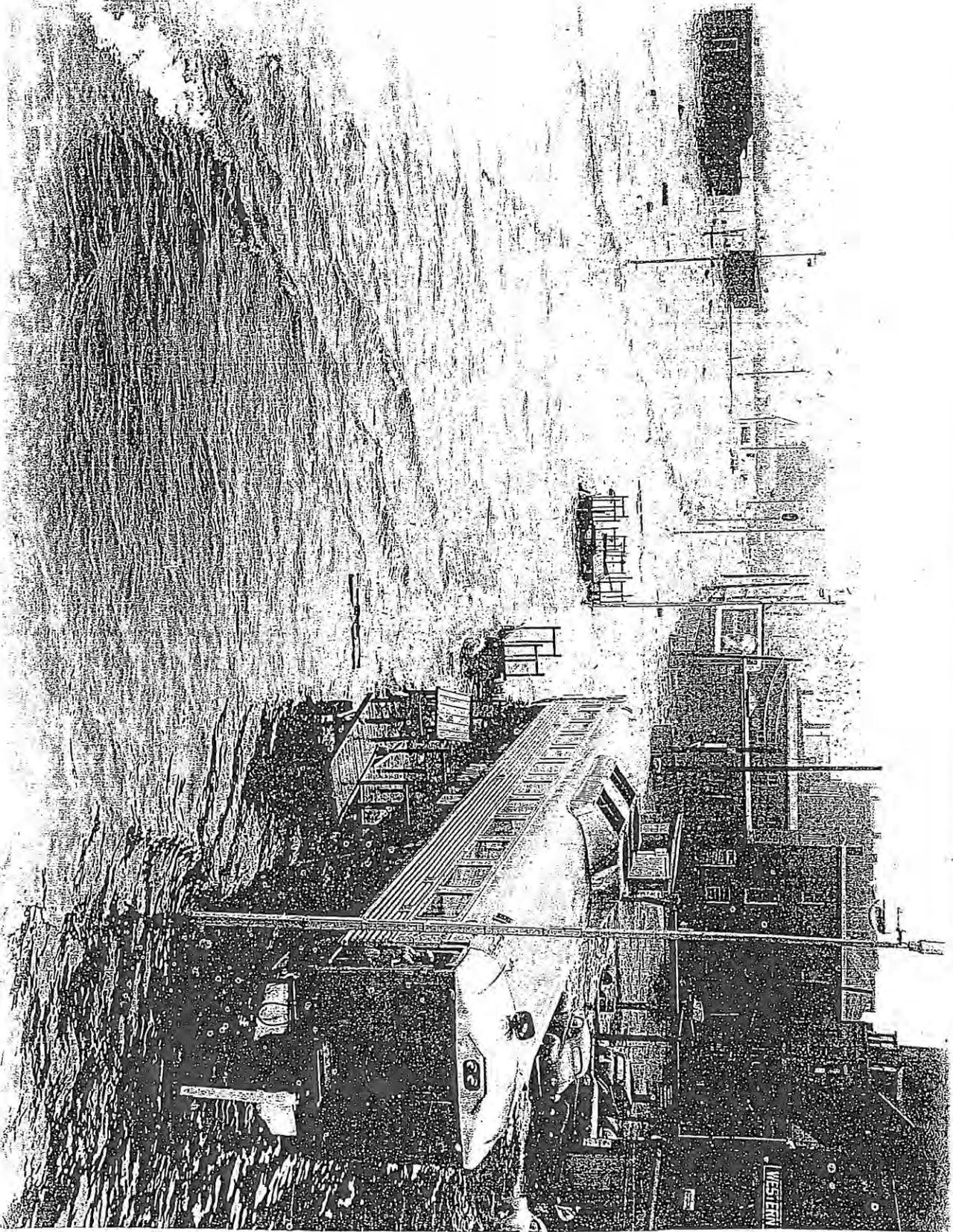
Program. Each agency will carefully consider how to appropriately apply this standard, and consider robust public input before deciding how to implement it.

To read the Executive Order, [click here](#).

To read the flood-risk reduction standard, [click here](#).

###

American Cars 8/31/54



NL9L

24 May 2016 From: Nancy d'Estang, PO 602, Old Mystic., Ct..

PLEASE see the attached map of the proposed Heritage Park in New London which shows the green, spacious, available land at Fort Trumbull. Surely this will affect your thinking regarding the proposed train station location of the Coast Guard Museum. (The Day 24 May 2016.)

During the past few years, many of us who are familiar with New London, with the train station, the train schedules, the congestion, the flood zone, climate change, DEEP regulations, and the low/medium income of New London—and the projected budget deficits—continue to be alarmed by the relentless march of the proposed Coast Guard Museum. Many letters, government documents, descriptive photographic evidence, plus alternative proposals, have been sent to dozens of the “players” leading this CGM plan. There has been virtually no response to the public’s concerns, no public hearings, no peep from Homeland Security, not from the climate change experts, not from the leaders of impacted transportation systems. The DEEP has not seen an application or a site plan.

Many years ago, New London engaged the Yale Urban Design Group to prepare a development plan for the Fort Trumbull area; they prepared an extensive proposal, which included a site for a Coast guard Museum, even a band shell, gracious lawns, water views and adequate parking. The entire site was planned to present a unified, expansive, gorgeous addition to New London. (The site reminds one of the distinctive, airy, beautiful, hilly location of Connecticut College, wisely chosen so many years ago.) The CGM could shine in a similar venue. Unfortunately, this Yale document seems to be unknown by the “players”, including the staffs of government offices we have contacted.

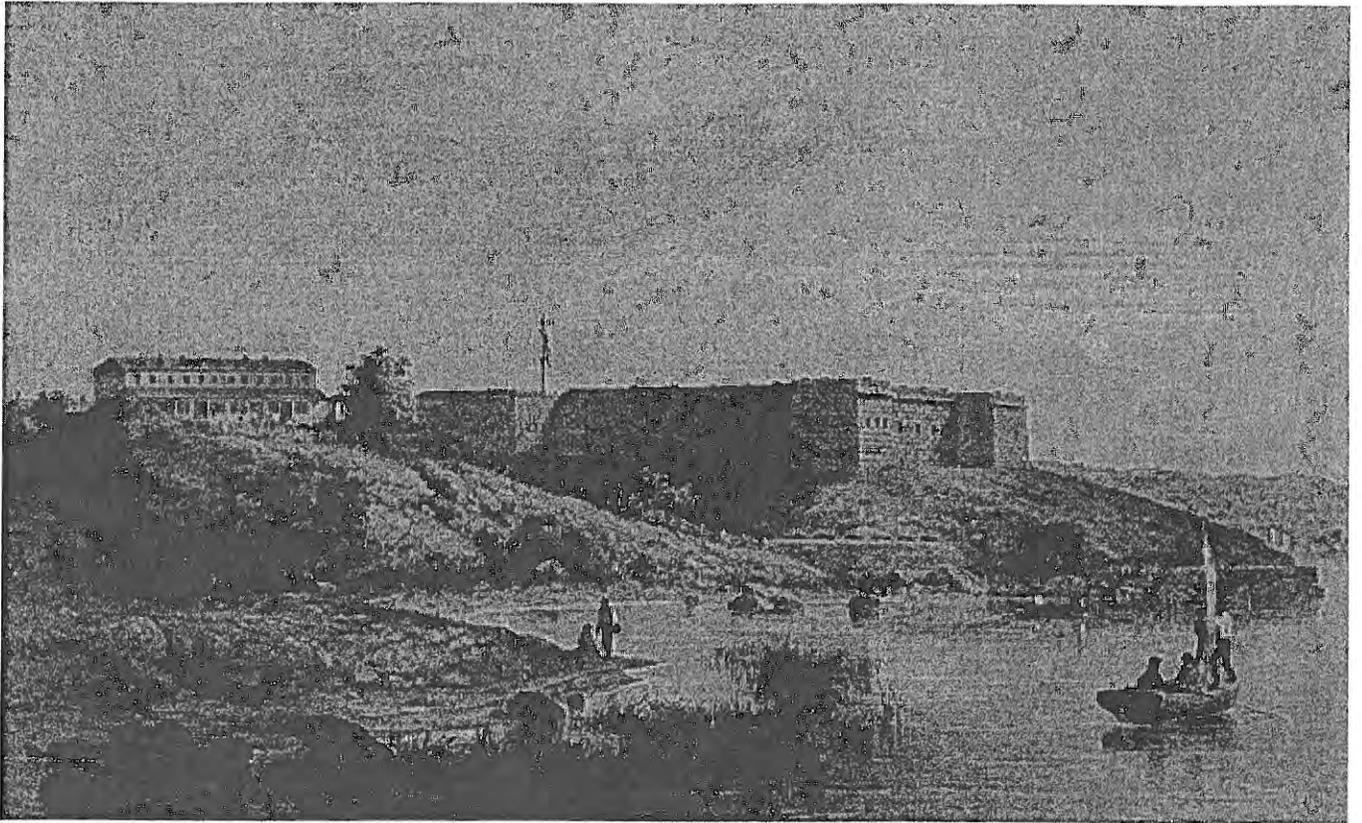
Has there been a walk-about of the two sites by the gentlemen who will plan and partially fund the proposed CGM; have they noticed the lack of maintenance, a decaying parking garage, tiny site, closed businesses, many trains per day (with the Shoreline proposed to add more); have they read of the deepening social problems facing New London? (See attached headlines.)

What happens in an emergency? EB, GD, subs, cargo docks, trains, buses, ferries, tall ships, Parade events---how do emergency personnel and equipment get to this spot? Homeland Security must be wringing collective hands.

There was to be no public funding for this endeavor, but it is recently revealed that a considerable amount of taxpayer money will be required. Why have there not been public hearings on this? Who upgrades the parking garage, who pays for the pedestrian bridge, who cleans the sidewalks, who collects the garbage, who fills the storefronts, who plants and maintains the flowers and trees? Who makes sense of a tiny area with a plaza, a statue, a whale, a pergola, an antique school, a landmark train station, a cut-off ferry dock behind rickety fencing? Why do the public see only artists’ fanciful concepts rather than site plans?

Current and projected budget deficits and low income residents should cause further awakening.

Thank you for your attention and further research.

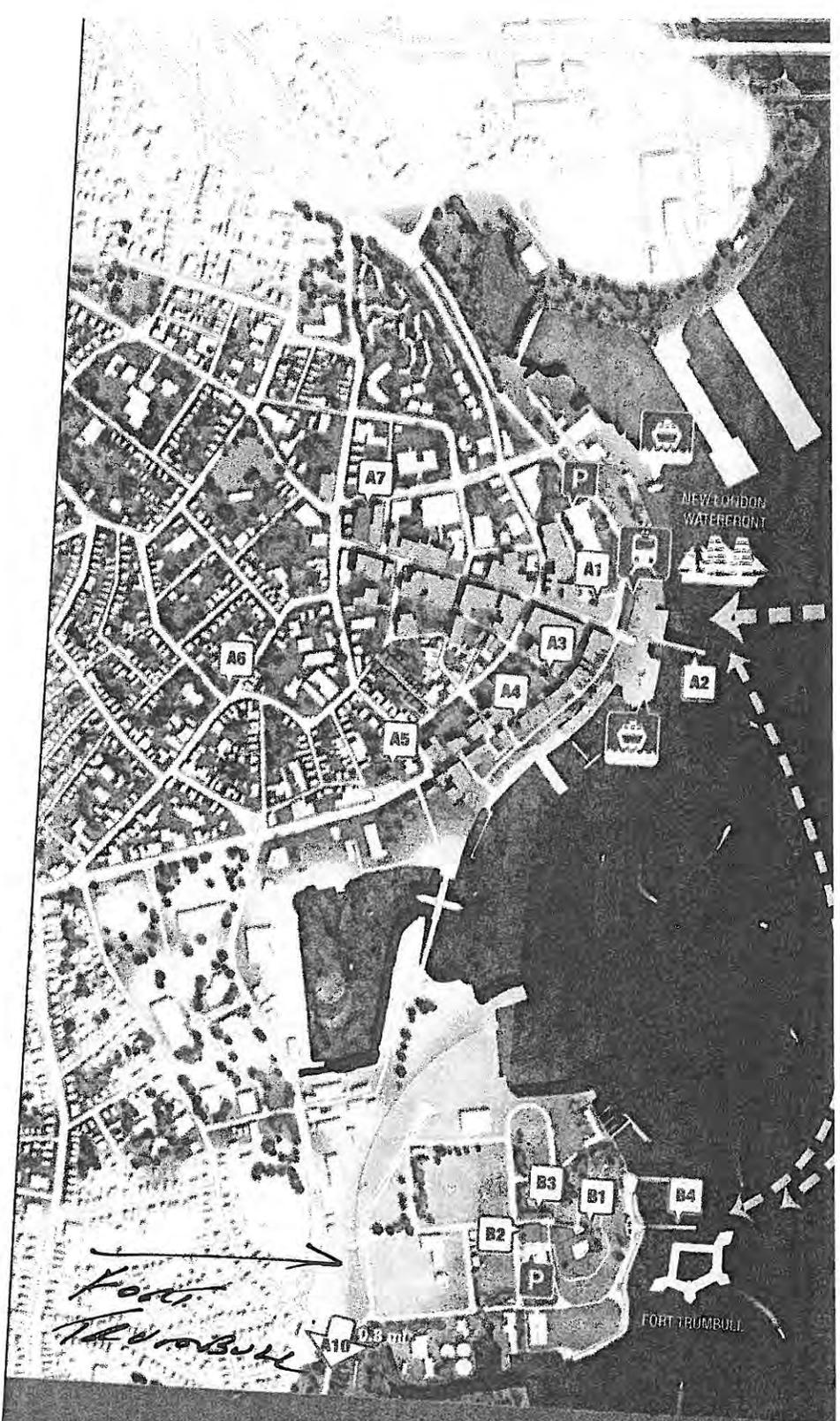


Fort Trumbull Vision
New London, CT

26 September, 2011

Yale Urban Design Workshop





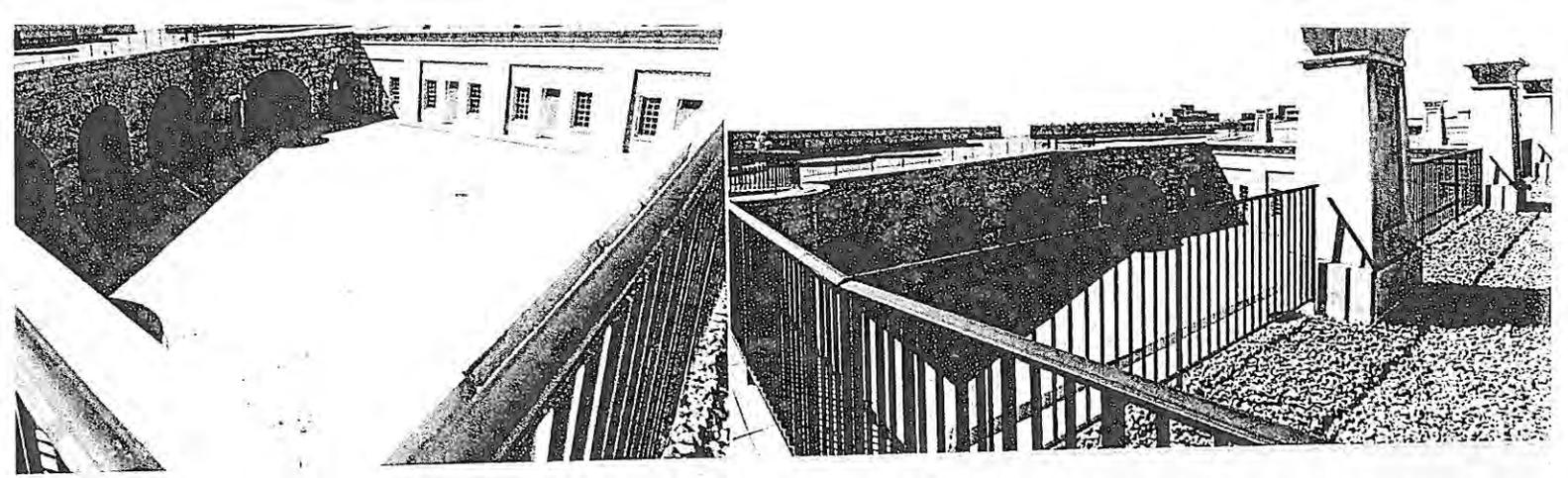
-  Union Station/Amtrak/Shoreline East
-  Long Island and Fishers Island ferries
-  Parking

www.thamesriverheritagepark.org
 1 Waterfront Park, PO Box 851, New London, CT

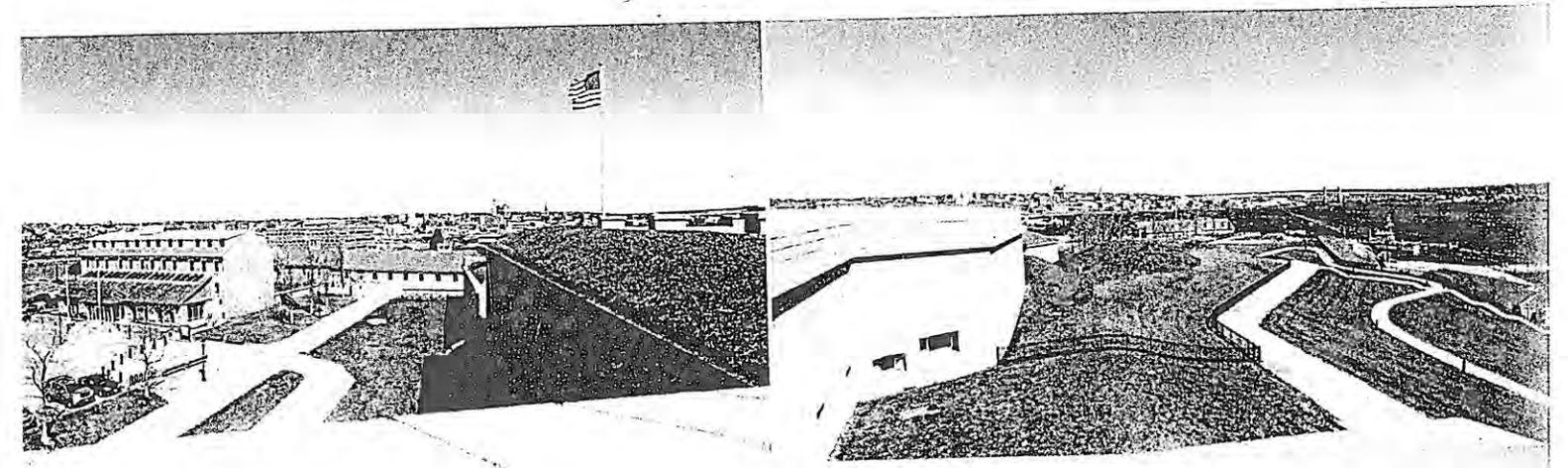
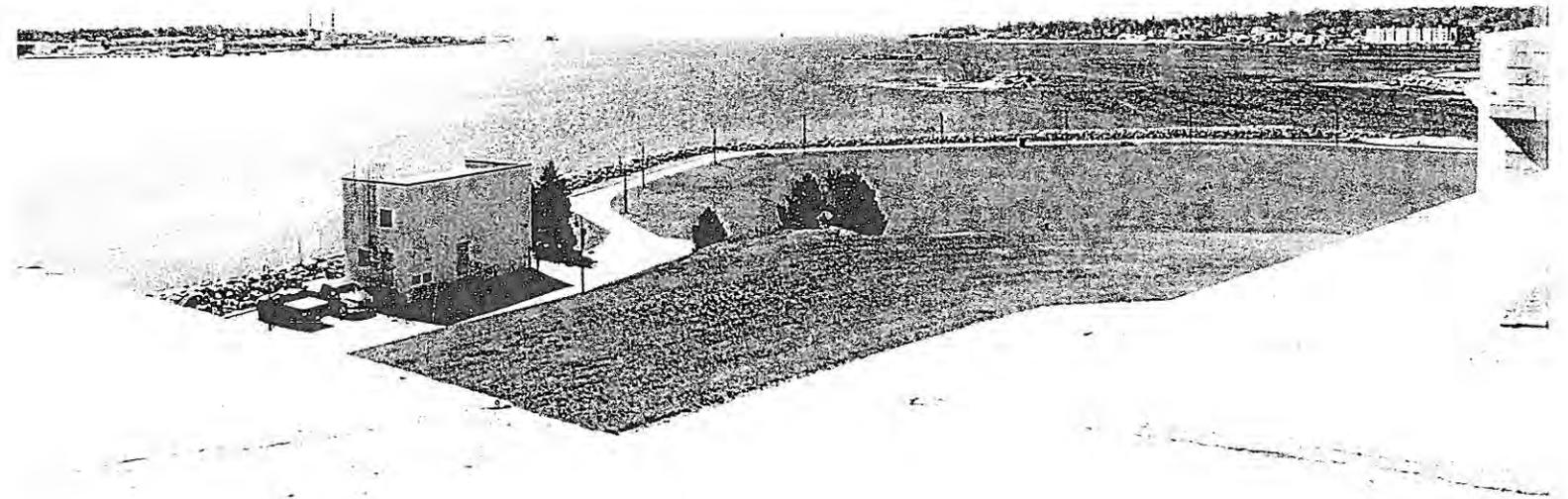


BY YALE URBAN
 DESIGN GROUP

www.thamesriverheritagepark.org



Fort Turnbull - "MK" 2016



1 July 2016

To: Mr. Tony Sheridan, president, Chamber of Commerce, Eastern Ct.

From: Betty Becker

Re: Coast Guard Museum

Sometimes letter writer are ill-informed, sometimes wrong, sometimes absolutely correct, and often authorities in their fields. Rather than their being dismissed at this crucial point in decision making, their words, often of wisdom, still need to be heard. The piece by David Collins today in THE DAY, page C1, is essential reading.

Note also that the DEEP reports, the Flood and V zone research are still going on. The site has not been firmly established.

It is incorrect for you to say that if the CGM does not go in downtown NL, it may be lost for Ct. The 2004 federal documents say that the CGM must be in New London, Ct. It is not site specific.

Further—the public have not been dealt with honestly or openly, as is noted from last Thursday's meeting when someone from the CG said: 'there is not enough water at Fort Trumbull for 'our boats'. Of course, that is not true—there is more water at Fort Trumbull than at the downtown location, as anyone can see by the charts online. A photo on the city web site shows the Eagle and Tall Ships tied up at the piers in Fort Trumbull. What does "our boats" mean? (Eagle, by the way, tours in summer and winters in Baltimore.:

So----research a bit more, remember your audiences, and think of who will pay for all of this. You must study the Yale Design Group's proposal of 2011 and know that they are just as capable in the Fort Trumbull study as in their much praised Heritage Park proposal. That group has "no skin in the game", no conflicts of interest, no political positions, and no money in it---and very little exposure, for some unknown reason.

Thank you for paying attention.

2504
14 June 2016

Considerations for: Coast Guard Museum Players, Tax Payers, City Planners, Government reps., media.

To avoid rubber stamping of this Coast Guard Museum project, those affected must:

Determine: who benefits, who will pay the costs, and what New London wants to be.

Determine: who wins, who loses. Is there a conflict of interest amongst the players

Study: Up-to-date Federal Flood Hazard zone maps and V zone maps; how they apply, how variances will be given

Study: climate change and sea level rise projections; find the consultants who really know the numbers and sites

Study: Certified plans, architectural drawings----for the underwater structural requirements, of the elevations, for the height. These must be available to the general public as well, since now the project calls for considerable public funding; the public must now be included, perhaps by a referendum.

Study: Fiscal issues/budget deficits of New London, the region, the state and local residents. All state residents are now involved. Will taxes be raised again?

Funding: for upgrades for parking garages, downtown buildings, sidewalks, abutting properties

Walk about: learn about the two sites: the train station and Fort Trumbull. Take an objective look.

Read: attached documents, photographs, opinion pieces, museums elsewhere

Read: Fort Trumbull Vision by the Yale Urban Design Group of the Yale School of Architecture; planning by professionals without the politics.

Read: DEEP environmental impact statement for the proposed Pedestrian Bridge. (Attached regulations.)

Regard: Homeland Security and emergency equipment concerns with this congested area: of EB, GM, Millstone, trains, ferries, cargo ships/docks, cruise ships, local business, Tourist and regular traffic, rapid exodus, "harbors of refuge"!

Design: How does this fit with the dignified and (quite) cohesive New London architecture? Stand at the Garde, look down State Street and try to envision it. Swirl down Bank Street ???? Picture that!

It appears that the museum is the consideration, rather than the views, the environment, the safety, the pleasure of thousands of people with kids in tow throwing frisbees across a lawn and of the hundreds of elements which will make it work---or not.

Thank you, Nancy d'Estang, Old Mystic; a tax payer

Survey says education needed on coastal storm risk

4-1-2015 DAF

LETTERS TO THE EDITOR

A risky location for Coast Guard Museum

No one can dispute the good and learned efforts by so many dedicated men and women who presently support and provide direction for the new up and coming National Coast Guard Museum in New London. However, historical research indicates that a portion of the site was under-water!

The Day publication of, "Looking Back, Volume 1, page 42," shows a photo taken in 1915 behind the train station during the Yale and Harvard regatta. The photo shows private vessels in an existing boat basin directly behind the train station. Aerial photos taken by the Fairchild Aerial Survey of New London in 1934 (online at CT Aerial Survey Finder Page 19340, photo No. 474) also shows that a portion the site was under-

water. The boat basin was filled in at a later date.

Mandatory test borings may indicate that expensive pilings must be installed. The Pfizer complex located less than a mile away required months of structural pile work driven over time, for support.

The proud Coast Guard Motto is Semper Paratus (Latin: Always Ready). The directors seem to be ready to place the museum behind the train station but are they ready to incur extra costs for necessary structural work?

Never too late to send the design staff over to Fort Trumbull for a better location.

William C. Bucko Sr.
Montville

Security violation prompts greater scrutiny of Millstone

For the second time
in less than a year, NRC
cites Waterford facility

By **JUDY BENSON**
Day Staff Writer

Waterford — For the second time in less than a year, the Nuclear Regulatory Commission has cited the Millstone Power Station for a violation that merits additional inspections and oversight.

The NRC announced Thursday that it has finalized its decision on a security violation found during an inspection in November. The finding was first announced in January, but the NRC had not categorized the severity of the finding until after a meeting in February with officials from Millstone owner Dominion Resources.

During that meeting, Dominion disagreed with the NRC's assessment of the significance of the violation, according to a letter the NRC sent Thursday to David Heacock, president and chief nuclear officer of Dominion.

Despite Dominion's objections, the NRC determined that the violation was significant enough to be "greater than green." The NRC uses a four-tiered color coded system to categorize the severity of safety findings, with green being the lowest, followed by white, yellow and red. Because the violation relates to security, the NRC said it will not disclose the color code assigned to it, nor the nature of the violation.

The NRC said it will increase its oversight of Millstone, including assigning additional inspections of security systems and procedures. Three

SEE MILLSTONE PAGE C6

DAF, 3 APRIL, 2015

13 January 2015

To: The Day, 47 Eugene O'Neill Dr., New London, Ct.

From: Nancy d'Estang, PO 602, Old Mystic., Ct. 06372

It seems there are numerous issues with and opposition to the proposed Coast Guard Museum which must be addressed ; the media need to present and debate these for the public as well as for the players involved.

Foremost: present the "July 2014 Pedestrian Overpass" document which states that this water front location is "a conservation area...because it is in a flood plain", which the DEEP interprets to preclude "any increase in square footage of office, retail, industrial, or business uses...."

Present the Yale Urban Design Group's research: "Fort Trumbull Vision": "emphasize water-related uses and experiences ideally related to the history of the site...connected to the waterfront portion of the Waterfront Park... complementing and relating to the Fort Trumbull State Park...Fort Trumbull, the original home of the Coast Guard Academy..."

The public need to know: site plan, regulations, safety for the public in this congested area, crowd control, overpass design, necessary upgrade of the garage, future of the glorious Richardson station, how the modernist glass museum will build on the proud traditional architecture in New London, and details of the alternatives.

Thank you.

ADDED: EMERGENCY VEHICLES
(HOME LAND) SECURITY

To Adam Papp
12 September 2014

Since I last wrote to you, there have been several more articles and letters written in opposition to the Coast Guard Museum's intended location on the crowded lot behind the train station in New London – and its attendant overpass. With that information and the newly released “National Coast Guard Museum Pedestrian Overpass, July 2014”, plus a re-reading of the “Fort Trumbull Vision--Yale Urban Design Workshop study” prompt me to write again. It seems that the Association has not seen the site plan drawings in the NCGMPO document which show a frightening intensity and proximity to the water-- hence the absurdity of building a major museum there. It seems clear that neither document has been carefully studied by those who are doggedly going forward with plans for the museum to be located behind the train station.

From the “NCGM Pedestrian Overpass”:

4.9.2. “The downtown New London waterfront area has been designated as a Conservation Area....because of its location in a floodplain. [State] Policy: Discourage new development activities within floodway and floodplain areas..., manage any UNAVOIDABLE activities.....”.

4.9.3. “State policy promotes long-term non intensive uses for projects within flood hazard areas....”. “Intensive floodplain uses have been interpreted by the DEEP to include...any INCREASE in square footage of office, retail, industrial, or business uses....”

From “Fort Trumbull Vision”:

Page 11: “Emphasize water-related uses and experiences.....proposed anchor uses...a cultural institution, ideally related to the history of the site, complementing and relating to Fort Trumbull State Park...”A new pedestrian bridge connected to the downtown portion of the Waterfront Park.”

Page 25: “Development should emphasize the specific history of the site, including maritime history.”

Page 29: “...there is an opportunity to develop an almost continuous alternative pedestrian and bicycle route along Shaw's Cove.....”

Page 41: “Anchor: Cultural Institution”. “.....but the most compelling match for the site and its history would be the proposed Coast Guard Museum....not only was Fort Trumbull the original home of the Coast Guard Academy, but...the opportunities to exhibit historic vessels, interact with exhibitions ...easy access from Downtown New London, makes this use in this area a logical and exciting option....”

Page 60: “Construct a Coast Guard Band shell at Fort Trumbull.”

**APPENDIX A9
PUBLIC COMMENTS ON
DRAFT SEA**

From: Bryan Doughty
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum feedback
Date: Tuesday, July 31, 2018 8:32:32 PM

Dear Jeanine,

I would urge Milone and MacBroom to view feedback here:

<https://www.theday.com/military-news/20180731/public-asked-to-weigh-in-on-latest-coast-guard-museum-designs>

I would also strongly urge either Milone and MacBroom or the museum leaders to simply walk around New London or go to community events and ask for feedback. I am fairly sure representatives will get an earful.

Although I believe many residents, including myself, are in favor of this museum, many are strongly against the proposed location. I fall in this camp. How can one support a museum that appears not to care one iota about the resident's of their host city? For reference, simply search the word "Trumbull" on the page linked above and you will get the idea and quickly. Right museum, but wrong location.

Until this Museum truly starts listening to and communicating with the citizenry of New London, I cannot offer any support whatsoever. Sadly this comes from a Coast Guard spouse that takes great pride in the Coast Guard, but I take no joy in how the Museum has and continues to treat my home city.

A concerned a devoted citizen of New London,

Bryan Doughty
860 287-0909

From: James e andriopoulos
To: [Jeanine Gouin](#)
Subject: United States Coast Guard Museum Design
Date: Wednesday, August 01, 2018 5:27:19 AM

A few points on the design. The very modern design somewhat clashes with the architecture of the area. The overall size (It is massive) dwarfs almost everything around it and it appears there is a solid wall on the water and train station side which creates a barrier. Perhaps I am viewing this incorrectly but it should be open to essentially see through, enjoying the water views from all sides and the views of the historic downtown area.

I would prefer a design that fits a little more in with the downtown architecture (ca. 1781-1900) with some modern twists, more open and better use of the outdoor space for families to gather, a cafe with outdoor seating.

Evan J. Andriopoulos
Developing businesses one step at a time - at the speed of light.
evanandriopoulos@me.com

From: Bob Erickson
To: [Jeanine Gouin](#)
Subject: Coast guard museum
Date: Wednesday, August 01, 2018 3:48:17 PM

Sorry, but we don't like the design nor the location. Looks out of place, next to the railroad tracks. And a box at that.

Coast Guard Academy is architecturally attractive and nicely located beside the river. Union station is architecturally attractive.

But putting a highrise box there!!!??

Bob and Joanne Erickson
1 Oakwood Drive
Gales Ferry, Ct. 06335

From: Robert Fromer
To: [Jeanine Gouin](#)
Subject: NCGM Supplemental Environmental Assessment
Date: Wednesday, August 01, 2018 12:02:28 PM

I request a copy sent as an e-mail attachment.

Robert Fromer
E-mail: saintrobert@comcast.net

From: Robert Russo
To: [Jeanine Gouin](#)
Subject: Coast Guard Academy Museum
Date: Wednesday, August 01, 2018 11:21:44 AM

The Coast Guard Academy Museum should be located in the Fort Trumbull area rather than in downtown New London for the following reasons:

1. The huge structure will dominate the landscape blocking the view of the harbor and dwarfing the historic Union Railroad Station and downtown New London.
2. Parking, always at a premium, will be problem. Shuttle buses could take visitors to and from the museum and downtown New London. Visitors would then not only be able to enjoy the museum, but they also would be able to explore the city and patronize its merchants and restaurants.

Sincerely,

Robert P. Russo
7 Mayfield Terrace
East Lyme 06333

From: Randy Terwilliger
To: [Jeanine Gouin](#)
Subject: CG museum
Date: Wednesday, August 01, 2018 10:16:28 PM

I am sure you will be getting quite a few letters regarding the looks of the building, its not the best location for it etc. My comment is dealing with something that is much more black and white.

Parking will be a nightmare . The current , rather run down , parking facility often has issues accommodating the summer parking as it is .Throw in the cars that will be displaced by the museum itself, at least 100 ferry related park now where the actual building will be situated and then add in any parking that the museum itself draws as well as the normal visitor, ferry and downtown worker cars and there is no way that they will all be accommodated.

Another very significant problem with the current plan is the absolutely necessary \$20,000,000 pedestrian bridge , money that the state of CT has much higher needs priority wise , and the location becomes even more ludicrous. Lets say for argument sake that the powers above come to their senses and see that there are better uses for that kind of money , especially when they are shutting down so many current quality of life programs throughout Connecticut ?. Yes the money is " promised " but it would not be the first time such a promise was broken. The bottom line is no bridge = NO museum .

If somehow all this eventually comes to fruition I can easily picture this real life situation. A out of town family of four drives into New London for the first time looking forward to a exciting weekend on Block Island. They have their tickets in hand, reservations set on the island and a Smart car reserved and waiting for them on Block. The have the car loaded with their two young children luggage for four , diaper bags, strollers and all the accessories that young ones require . They pull up at the appointed time at the designated parking facility and see a sign , LOT FULL. Being new to the area, what would they do now, how devastated would they feel ? Put yourself in that frame of mind and then tell me this is a good idea ?

There are other reasons why this entire situation could have been avoided by going to a more suitable location but I don't know of another one that is as cut and dry as this one.

Randy Terwilliger

From: ks1u@att.net
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum
Date: Thursday, August 02, 2018 9:34:25 AM

Hello. My dad was in the Coast Guard for 38 years and most of my childhood was spent on the grounds of the Academy, something which I am very grateful for.

I have only one suggestion for the museum, it should be built on the property formerly owned by the "digestive doctors" midway down Bank Street. I believe the property is still for sale, is above the flood zone and contains far more parking than near the train station. Furthermore, the pedestrian traffic is not a problem like it would be if the museum were moved to Fort Trumbull, as others have suggested.

Thanks for listening.

George Blahun Jr
7 Mamacoke Road
Quaker Hill, CT 06375

From: ks1u@att.net
To: [Jeanine Gouin](#)
Subject: Re: Coast Guard Museum
Date: Thursday, August 02, 2018 9:51:59 AM
Attachments: [Bank St.pdf](#)

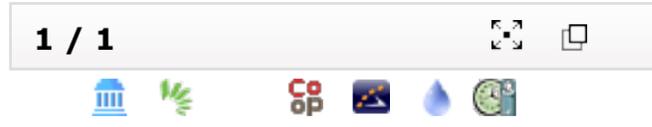
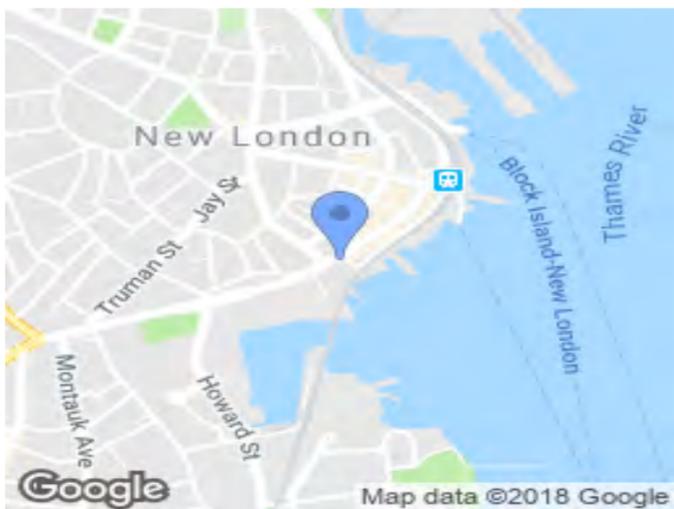
Hello again. I am sending the MLS sheet for the property I mentioned in my initial email about the museum location. Although I am a real estate broker, I have no connection with this property other than thinking it to be a better location for the museum.

George Blahun

7 Mamacoke Road
Quaker Hill, CT 06375

860-443-3333

224-258 Bank Street, New London, CT 06320 Status: Active List Price: \$1,900,000
County: New London Last Update: 01/26/2017 Orig. List Price: \$280,000
MLS#: E10014335 Tax Parcel#: 1999766 Days On Market: 1,301
Commercial For Sale Sub Property Type(s): Investment, Office



Walkscore is: - - 88 Very Walkable - Most errands can be accomplished on foot.

Description of the Property Containing the Space For Sale
Potential Short Sale: No
Location:
Acres: 2.43 In Flood Zone: No Fronts On:
Zoning: CommBusinessDistrict Elevation Certificate: No
Year Built: 1988 Number of Units: 40.46 Conforming Use:
Property Tax: \$83,756 Mil Rate: 40.46 Assessed Value: \$2,070,110 Tax Year: July 2017-June 2018

Description of the Space For Sale
Present Use:
Stories: 3 Ceiling Height: Restrooms: 1 Potential Use:
Business Included: Overhead Doors: 0 Loading Docks: 0
ADA Compliant:

Features
Lot Description:
Construction: Frame, Masonry, Other
Foundation:
Roof:
Flooring: Vinyl, Wall-to-Wall Carpet
Handicap Features: Handicap Parking
Commercial Features: Elevator, Fire Suppression System
Exterior Feat:

Utility Information
Available Utilities:
Electrical Voltage: Electrical Amperage: Electrical Phases: # of Electrical Services:
Heat Type: Hot Air, Fueled By: Electric, Natural Gas
Cooling: Central Air
Water & Sewer Service: Public Water Connected, Sewage System: Public Sewer Connected

Parking Information
Covered Spaces: Uncovered Spaces: 151 Total Spaces: 151
Parking Spaces Per 1000 Sq. Ft. Parking Description: Open, Parking Lot

Square Foot Information
Total Square Feet: 51,000 Square Foot Source: Space is Subdividable No
Industrial Square Feet: Office Square Feet: Residential Square Feet:
Retail Square Feet: Warehouse Square Feet: Additional Space Available: No

Public Remarks
Office buildings on Thames River near Shaw's Cove Office Park. SALE PRICE REDUCED - now \$1,900,000 includes four contiguous buildings / one integrated complex, total sl 50,000+/- . Class A & B offices. Easy access to I-95. Also - up to 13,000sf available for lease. See #E10016443

Marketing History
Current List Price: \$1,900,000 Last Updated: 01/26/17 Off Market Date: DOM: 1,301
Previous List Price: \$2,800,000 Entered in MLS: 01/09/15 Contract Date: CDOM: 2,039
Original List Price: \$280,000 Listing Date: 01/09/15 Expiration Date:

Showing Inst: **Call agent.**
Lockbox: **None/**
Owner:
Directions: **Downtown New London on the Thames River near Shaw's Cove Office Park. Former A&T building.**

Date Available:
Owners Phone:

Bank Owned: **No**
Occupied By:

Listing & Compensation Information

Listing Contract Type: **Exclusive Right to Sell/Lease**
Buyer's Agent Comp.: **\$1**

Service Type: **Full Service**

Sign: **Yes**

Internet Listing Distribution Authorizations

The List Office has authorized display on: **RPR, Homes.com, Homesnap, IDX Sites, Realtor.com, Zillow Group**
The List Agent has authorized display on: **Homes.com, IDX Sites, Realtor.com, Homesnap, Zillow Group**

**** NOTE: This listing will only appear on those websites authorized by BOTH the List Office AND the List Agent. ****

Listing Agent/Broker Information

List Agent: **John Jensen (EJENSENJ)**  Lic.#:

Website: <http://www.pequotcommercial.com>

Phone: **(860) 447-9570**

Email: jjensen@pequotcommercial.com

List Office: **Pequot Commercial (PEQUOT00)**

Website: <http://www.pequotcommercial.com>

Phone: **(860) 447-9570**

[If you believe there is a violation on this listing, click here to report the problem.](#)

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Property Type is one of 'Business For Sale', 'Commercial Lease', 'Commercial Sale'

Status is 'Active'

City is 'New London'

Ordered by City, Property Type, Status, Current Price

Found 55 results in 0.02 seconds.

From: livnonthesound@aol.com
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum
Date: Thursday, August 02, 2018 2:32:56 PM

To Whom It May Concern,

I am a New London native who has lived in the New London area all my life. My husband, also a New London native, is a 32 year veteran of the U.S. Navy in submarines. Most of his service served from submarines here at the U.S. Submarine Base.

Regarding the placement of the new Coast Guard Museum in downtown New London:

A postage stamp of a lot with no room for expansion

Property acquisition of land that is submerged under water, to me unusable

Parking issues. Yes there is the parking garage but many people will not use it.

Building of a walkway that will be an eyesore. One was torn down years ago because of rust & low maintenance. Who will maintain this one?

Congestion from trains & ferries not suitable for museum atmosphere, children or families

My suggestions:

Build at Fort Trumbull where there is plenty of land & room for expansion of the museum. Also the site of the first Coast Guard Academy

Access to Fort Trumbull National Park where people can also review the history of the Coast Guard and their involvement in the history of New London

New London Coast Guard Station located at Fort Trumbull where people can see Coast Guard vessels from the park

Use the \$20 million earmarked for the walkway and build a walkway from Fort Trumbull to downtown.
Better use of the money

Less congestion at Fort Trumbull & better safety for children & families

Good luck! Not sure I will see any of this in my lifetime!

Mary M. Christina

From: christybob_41@aol.com
To: [Jeanine Gouin](#)
Subject: US Coast Guard Museum;
Date: Thursday, August 02, 2018 1:48:28 PM

The initiative to have the National USCG museum in New London is wonderful! But; it belongs in the Fort Trumbull area where there is ample space. To stuff it in the currently proposed site next to a historic train station is foolish! I lived in New London, CT most of my life, and now at 77 years old hate to see yet another big screwup in downtown!
Master Chief Robert E. Christina USN Retired.
Sent from my iPhone

From: Bryan Doughty
To: [Jeanine Gouin](#)
Subject: Re: Coast Guard Museum feedback
Date: Thursday, August 02, 2018 8:44:50 AM

Dear Jeanine,

Thank you for your email. We are logging all comments received and will be evaluating them following the close of the public notice period, which occurs on September 4, 2018.

Out of curiosity, will this be something public will be able to view?

I think it would be a great benefit to the museum in getting public buy-in to make all feedback publicly available to show how changes are possibly made based on public feedback. That is if public feedback is indeed a factor in decision making and I strongly believe that is not the case currently. As I indicated, I actually think the public is totally irrelevant and in fact based on quotes in The Day from Adm. Robert Papp it would seem like he would rather the public go away so the museum could be built without any public interference:

The Day: Are you satisfied with the museum effort at this point?

Papp: I'm beyond satisfied. I'm very happy with the efforts thus far. We've made great progress despite multiple obstacles — environmental, fundraising, and quite frankly part of it is negativity expressed by readers of The Day in the New London area. Revisiting the issue as to whether the museum should be at the waterfront or at Fort Trumbull or some other place is a waste of time and effort at this point. The Coast Guard has chosen the location and we're moving ahead with it.

<https://www.theday.com/military/20170729/admiral-on-museum-coast-guard-has-chosen-location-and-is-moving-ahead>

When one tries to run over the public you will "frankly" get negative feedback. Even worse is when you tell the public that their feedback is essentially "a waste of time and effort at this point". The museum will continue to get negative feedback until they truly reach out to the public. The museum has not even attempted to become part of New London, but rather they are trying to occupy a space within New London.

Sadly and until proven wrong, as Adm. Papp has indicated, the ship has sailed and I believe he is right about the feedback.

Take care,

Bryan Doughty
860 287-0909

On Aug 2, 2018, at 8:23 AM, Jeanine Gouin <jgouin@mminc.com> wrote:

Jeanine Armstrong Gouin, P.E.
Vice President

<image001.png>
99 Realty Drive, Cheshire, CT 06410
203.271.1773 x 271 | mminc.com
[Facebook](#) | [Instagram](#) | [LinkedIn](#) | [Twitter](#)

From: Bryan Doughty <bvdpress@gmail.com>
Sent: Tuesday, July 31, 2018 8:32 PM
To: Jeanine Gouin <jgouin@mminc.com>
Subject: Coast Guard Museum feedback

Dear Jeanine,

I would urge Milone and MacBroom to view feedback here:

<https://www.theday.com/military-news/20180731/public-asked-to-weigh-in-on-latest-coast-guard-museum-designs>

I would also strongly urge either Milone and MacBroom or the museum leaders to simply walk around New London or go to community events and ask for feedback. I am fairly sure representatives will get an earful.

Although I believe many residents, including myself, are in favor of this museum, many are strongly against the proposed location. I fall in this camp. How can one support a museum that appears not to care one iota about the resident's of their host city? For reference, simply search the word "Trumbull" on the page linked above and you will get the idea and quickly. Right museum, but wrong location.

Until this Museum truly starts listening to and communicating with the citizenry of New London, I cannot offer any support whatsoever. Sadly this comes from a Coast Guard spouse that takes great pride in the Coast Guard, but I take no joy in how the Museum has and continues to treat my home city.

A concerned a devoted citizen of New London,

Bryan Doughty
860 287-0909



Mary Gadbois
358 Boston Post Rd
East Lyme, CT 06333

Aug. 2, 2018

attn:

Jeanine Goerin — Re: Coast Guard Museum
See the picture in The DAY of the
proposed museum in New London. Need
to comment. Can't believe what we saw.

This building is disgraceful! It
does NOT fit in with the surrounding city
and its environment, buildings, etc. — certainly
doesn't fit in next door to the historic
train station by any means.

This building doesn't fit in with the
surrounding communities either. It does
not complement anything. It doesn't
fit in with the beautiful Coast Guard
buildings at the Academy or Fort
Trumbull. What are you thinking?

We'd never go there. And we would
not take out of state/town people there.
We'd never contribute to it.

Please — go back and re-do it.
Be more tasteful and respectful!

Mary & Bob Gadbois

From: George Grossomanides
To: [Jeanine Gouin](#)
Subject: U.S. Coast Guard Museum New London, Ct.
Date: Thursday, August 02, 2018 8:31:15 PM

Dear Ms. Gouin, I am a student of architecture and find the design choice of the proposed museum quite perplexing. Historically New London is a colonial seaport and has a classic brick train station located at the foot of State St. . The proposed design is a ultra-modern glass design that does not mesh well with the existing historical theme of the Whaling City. I feel it is too avant garde for this particular place and has no connection to the maritime history of our region. Also the coastal weather is also another obstacle. Please offer a more appropriate design. Sincerely yours, George S. Grossomanides, 189 Browning Rd. Norwich, Ct.06360

From: L. C.
To: [Jeanine Gouin](#)
Subject: coast guard museum
Date: Friday, August 03, 2018 10:25:59 PM

Fort Trumbull.

Because:

They destroyed a lovely neighborhood and people's lives for nothing, and this would actually be "something".

Because:

There's a lot of space, it has a beautiful view of the river, it's next to a Fort, and you can do whatever you want with the parcel.

Because:

Downtown is nearly impossible to drive through (especially in that area) as it is, and yet it's a primary artery to I-95, rt. 32 and I-395. It is insane to build a massive building next to what is essentially an alleyway. And zero parking.

Because: have you seen that area flooded? I have. And it was no "100 year flood". It was super-storm Sandy. You'll have to rescue yourselves next big storm (which, thank you global warming, will not take another 100 years).

Because:

Nobody likes modern buildings; they'll get over it (or not), but the actual problem is: it's going to look like a giant pimple on a small face. The proportions are all off. One thing to be "modern". Another to look silly.

At the end of the commenting period, please provide us with a tally of how many "yea's" to the site/building you get, and how many "nay's". And then tell us what you decided.

Thank you.

Lisa Crowley
New London

Sent from [Mail](#) for Windows 10

*
Please include these
Comments
→

ONLINE FEEDBACK

The planners of the U.S. Coast Guard Museum in New London released their new design plan for the waterfront structure this past week. Here is what some readers of theday.com had to say.

"I believe the Coast Guard Museum should be built at Fort Trumbull where that area could be added to with eating places, outdoor concerts like the Coast Guard Band and exhibits. A \$20M bridge would not have to be built."
-LittleEyes

"Downsize the museum. Really downsize it. Then put it inside Union Station. Job done."
-Frank

"I think this is a done deal, and this getting the public's opinion is just a load of crap. This museum could be amazing and in the age of GPS that's just an excuse that no one will find it in Ft. Trumbull. It should be built in Ft. Trumbull and for a lot less. That's just my opinion, not that it matters any."
-Maya

"Looks like a giant hot greenhouse. The train station is an architectural gem, soon to be defaced by this ugly monstrosity. Sort of reminds me of how the hideous expensive Quonset hut style, exhibition building at the Seaport sticks out like a big sore thumb on Greenmanville Ave. in Mystic at the Seaport. Serves a purpose but at an expense to the eyes."
-Hobo

"Trying to jam a museum showcasing a multi-mission branch of the Armed Forces in a very small plot of land in a highly congested city area with limited parking, that is also attempting to reinvigorate the adjacent port, is a bad idea. A glass box on a floodplain that blocks the views of many other city and private enterprise endeavors."
-Chris Ford

"Yesterday on the NBC morning news they reported that the Pirelli building directly in front of IKEA was named 'Ugliest Building in Connecticut.' Not for long!"
-Rich Lather

"Design still ugly & out of place for the historic history of New London."
-Seacrest

RECEIVED
AUG - 9 2018
MILONE AND MACBROOM

United States Coast Guard
90 Milone & MacBroom Inc.
Attn: Seanie Goulin
99 Realty Drive
Chelsea, MA 01937
Ct. 1000 N. Main St. 06320

RECEIVED
AUG 20 2018
MILONE AND MACBROOM



United States Coast Guard
% Milone & MacBroom, Inc.
ATTN: Jeanine Goulin
99 Realty Drive
Cheshire, CT 06410

You were kind enough to solicit comments on this project so here goes...

The museum should be built at Fort Trumbull to blend in with the other lovely history that's already there. We don't know who saved the stone museum buildings there from the wrecking ball but they should be immortalized as heroes. So if the town has the land tied up in legal proceedings let them get off their duffs and fix it. The Coast Guard Museum can wait a few; hopefully, it would be here long after we're all gone. There are so many things wrong with the currently proposed site. Where do you start? Some of the required land is under water and would require fill; it would still be in a flood zone. 20 million for a walkway? One can't even park a car to use the train during the week (or on the summer weekends when the ferries are busy). Next to our retained and historical train station it looks like a bad migraine!

The town says it's up to the Coast Guard; the Coast Guard says it's up to the town. Follow the money and you'll have the answer!

New London clings to the hope that the land will be their lottery ticket out of fiscal irresponsibility. The Coast Guard holds a grudge because years ago they wanted to buy some adjacent land south of the Academy and the town wouldn't sell it to them.

After the architectural nightmare the Seaport just built, almost anything goes for an edifice. At this point that's immaterial. It's the insane placement of the building. About the only thing crazier that has happened in the 45 years we've lived here is the overhead electric lines put in for the railroad. For the few minutes they saved in time between Washington and Boston, they could have shortened the layover in New Haven and not ruined the entire southern New England coastline.

People without axes to grind should make a field trip down here to see what's here; just like the objective gentlemen who saved the Submarine Base a few years back when all the politicians wanted to close it—for no tactical reasons.

You all have our prayers and support to sort out this dreadful mess. We can guarantee lots of meaningful \$\$ support if it's moved to the Fort. The New London and southeastern communities wholly support the Coast Guard, the Academy and the men and women who pass through there.

Thanks again for asking for input !

Fred & Ann
NEW LONDON, CT

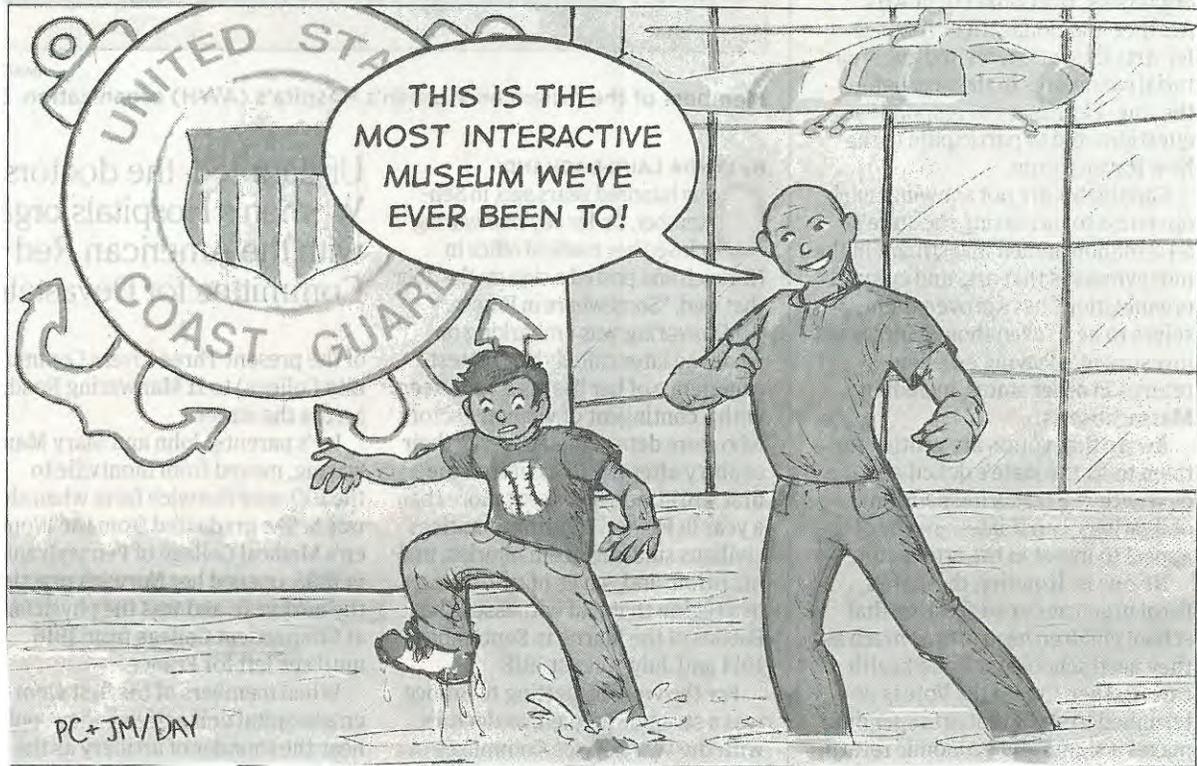
8-6-18

From: Susan Munger
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum
Date: Tuesday, August 07, 2018 5:36:05 PM

Construction of such a large building would disrupt downtown business. How many could survive several years of slowed traffic, parking challenges, dug up streets, dust, noise? Years ago a nice restaurant on Pequot Ave closed because no one wanted to deal with Pfizer construction. I find it hard to believe that downtown merchants are comfortable with what the proposed project would do for them. Not long ago a moving van couldn't make the turn in front of the train station and disrupted traffic for some time. New London is an old city with narrow, often curved streets (part of its charm) not built for monstrous construction projects. Put it in Ft Trumbull where land is ready to go, is steeped in Coast Guard history and current day Coast Guard Activity. A beautiful modern glass structure would fit there just fine. Visitors could then walk, drive, bike to our wonderful downtown. Win-win for all.

Susan

SUNDAY CARTOON: SITE SEA-ING



HARTFORD CT 061

07 AUG 2018 PM 1 L



UNITED STATES COAST GUARD
 % MILONE & MACBROOM, INC.
 ATTN: JEANINE GOULIN
 99 REALTY DRIVE
 CHESHIRE, CT

RECEIVED
 AUG - 9 2018

MILONE AND MACBROOM

06410

06410-165699



From: Joan Ruitto
To: [Jeanine Gouin](#)
Subject: comments about the Coast Guard Museum from a resident
Date: Saturday, August 11, 2018 3:02:08 PM

Dear Ms. Gouin,

I would like to register my concern about the plan to construct the Coast Guard Museum in New London. This plan does nothing to make New London look like a whaling-fishing town. This was the reason a recent plan to renovate a downtown building was rejected. This is an opportunity missed for our town architecture to preserve our historical significance..

The parking plan is deficient and would negatively affect our city. The cost is exorbitant for a museum that would service very few people; while the state of Connecticut could make better use of its money in our schools. Headlines describe the fate of towns curtailing their education budgets that could use this state funding.

This project will probably follow the path of the South Street Seaport Museum in New York City which is now closed due to lack of attendance and cost of maintenance.

As a resident I deeply oppose this project.

Thank-you for providing a venue for comments.

Joan Ruitto
7 Rockbourne Lane
New London

From: David Andrew
To: [Jeanine Gouin](mailto:Jeanine.Gouin)
Subject: Coast Guard Museum Design Comment
Date: Tuesday, August 14, 2018 6:49:46 PM

Attention: Jeanine Gouin
99 Realty Drive
Cheshire, CT 06410
Fax: 203-272-9733
jgouin@mminc.com

I am writing to submit comments on the design of the new Coast Guard Museum specifically in relationship to the multimodal hub of New London Station, the adjacent ferry docks, and the public spaces surrounding the station.

It is my belief that the design of the museum and adjacent public spaces should enhance the public realm on both sides of the tracks and create a vibrant, welcoming, and socially active area.

I am concerned that this plan as currently formulated will fail to leverage the unique opportunities of this site other than by taking advantage of the panoramic river views which has been repeatedly promoted throughout the development of this project. I believe that its location in downtown New London and immediate proximity to transit connections, local small businesses, and existing downtown public space should be recognized as the site's greatest assets and the design of the museum and space should seek to strengthen these connections in the interest of promoting the vitality of the immediate area.

Firstly, I feel that the most recent design will fail to create an attractive public space in front of the museum. The previous design allowed for a stronger northern edge to the plaza and appeared to include stepped seating, ideal for an outdoor gathering space. This new design, with a glass curtain wall reaching to the ground and an entrance to the museum there, diminishes the potential of the plaza area as its own vibrant public space into just an entranceway. This area should be a vibrant gathering place where families, children, and local residents can linger and enjoy the views and the public life, with comfortable seating and amenities, such as water fountains, planters, and even a cafe. The glass walled facade of the museum fails to create an attractive boundary to the space.

Secondly, I am concerned by the design elements around the rail alignment, specifically what appears to be a concrete wall running between the easternmost track and the plaza and museum. I have been concerned since the beginning of this process by the lack of attention paid to the incredible opportunity brought about by the proximity to this valuable transportation asset, the Northeast Corridor, and the design for these structures

seem to display an indifference to the experience of people waiting on the platform, arriving by train, or simply those enjoying the views from the plaza to the train and vice versa. A concrete wall running along the track would create an unpleasant, dingy, and most of all loud (when diesel trains enter the station) experience for riders, and would create a visual barrier between the station and the water. Any infrastructure erected along the rail alignment in this area should be sensitively designed to maintain and enhance visual connections between the rail station and platforms with the museum, the plaza, and the water. The museum should embrace it's proximity and ease of access via rail and promote it as the best way to get to and from. Connecting Washington, New York, Providence and Boston, the NEC should be the preferred way to bring visitors to the museum and to nearby local businesses therefore enhancing the economic prospects of downtown.

Lastly, I would say that your team should reconsider the plan to extend a pedestrian bridge all the way to the parking garage. Connecting this pedestrian bridge to the garage is an invitation for people to drive to New London, park in the garage, and then proceed directly to the museum or ferries while bypassing any opportunity to patronize businesses or contribute to the street life of downtown New London. Any sort of development that creates such an umbilical connection to a parking structure while bypassing the public realm contributes further to automotive dependence on our society and makes it less likely for downtown businesses to gain benefits from the museum's arrival. The museum should be designed and promoted in such a way to encourage people to build a day in New London around it and to pair their museum experience with other local economic activities. Providing a direct bypass to the parking garage discourages that. Furthermore, the concept of grade separating pedestrian crossings to avoid obstructing busy roads is a relic of 1950's thinking that puts motorist convenience above all other factors. The museum should instead design an attractive landing for the pedestrian bridge at the foot of Union station and implement traffic calming improvements to the street crossing, as well as determine other improvements to make the plaza area a more vibrant, attractive pedestrian area. Wayfinding signs should point visitors who arrive by car, train, or boat towards local destinations. Lastly, this pedestrian bridge is likely to be a costly investment and that money could be spent more wisely on other aspects of the design.

Overall I hope that an updated version of this plan will better contribute to the downtown environment and seize the opportunities of being a transit adjacent site than the current plan. With the prospect of expanded commuter and regional rail service, and the potential for future rail service up the Thames River valley to connect to Mohegan, Norwich, Willimantic and Storrs, New London looks to remain a major multimodal transportation node for a long while. This is a tremendous asset to the museum and I hope that you take advantage of it accordingly.

Regards,

David Andrew

Frequent visitor to New London via car and train, for access to Block Island.

--

David Andrew

[LinkedIn](#) - [Twitter](#)

DEAR SIRS:

8/17/18

THE BUILDING YOU HAVE DESIGNED FOR THE US COAST GUARD MUSEUM IS BEAUTIFUL.

IT WILL BE A CRIME TO HIDE IT BEHIND THE OUTDATED RAILROAD STATION, IT WILL BE SUBJECTED TO APPROX 50 TRAINS PER DAY. THE ONLY PEOPLE THAT WILL BE ABLE TO SEE THE MUSEUM WILL BE ON THE CROSS SOUND FERRIES.

PARKING HAS ALWAYS BEEN A PROBLEM IN NEW LONDON, AND ACCESSIBILITY TO DOWNTOWN IS IMPOSSIBLE FROM RTE 95

DO THE COAST GUARD A FAVOR AND LOCATE THE BUILDING WHERE THERE IS PLENTY OF PARKING AND EASY ACCESS AS WELL AS VISIBILITY, SUGGESTED SITES ARE LISTED BELOW:

1. FORT TRUMBULL, PLENTY OF SPACE, NO NEED TO BUILD A NEW FOUNDATION AND SEA WALLS, PLENTY OF SPACE FOR PARKING AND SUPPORT FACILITIES. FORT TRUMBULL WAS THE ORIGINAL SITE OF THE USCG ACADEMY AND THE MERCHANT MARINE ACADEMY. THEY ALSO HAVE A LARGE DOCK FOR THE "ETALS"
2. CRYSTAL APARTMENT AREA WHICH WILL BE DEMOLISHED SOON, UNKNOWN SIZE OF THE AREA BUT EASY ACCESS TO RTE 95 AND LOTS OF VISIBILITY, WALKING DISTANCE TO THE COAST GUARD ACADEMY.

THANKS FOR YOUR EFFORTS
SINCERELY
EDWARD J. RYAN
800-884-2255

EDWARD RYAN
190 Ann Ave.
Mystic, CT 06355

EDWARD RYAN
190 Ann Ave.
Mystic, CT 06355



RECEIVED
AUG 20 2018
ONE AND MACBROOM

US COAST GUARD ACADEMY
C/O MILONE & MACBROOM INC
99 REALTY DRIVE

LETTERS TO THE EDITOR

8-20-2018

In so many ways,
a bad location

This is in regards to the "Coast Guard museum new look" (Aug. 1). It is amazing to me that this museum proposal has been allowed to come this far without an intervention of common sense to stop this ill-advised monstrosity.

Not long ago a developer was stopped on a Bank Street renovation because his proposed demolition and replacement project was not in keeping with New London's historic look. Yet suddenly it is OK to build a four-story glass cube in the historic waterfront district that may fit Hartford's office building architecture but is completely out of place here.

The one-third acre site is inadequate and would not meet the zoning for a small house lot, let alone a building of this magnitude. The architect's sketch clearly demonstrates how foolish this site is with railroad tracks and train power cables adjacent to the building. Coupled with the fact the structure would be in a hundred-year flood plain, no available parking, need for a \$20 million bridge at the taxpayers' expense, and the acquisition of an additional one-third acre that is mostly submerged land, makes the overall concept a really dumb idea.

This project does not need an environmental study. What it really needs is a new site and a new design.

Dan O'Donnell
Groton

THE DAY

MILFORD CT 064

22 AUG 2018 PM 4 1



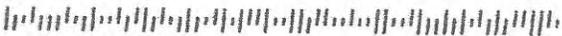
RECEIVED

AUG 24 2018

MILONE AND MACBROOM

United States Coast Guard
C/o Milone & MacBroom, Inc.
ATTN: JEANINE ROWIN
99 REALTY DRIVE
CHESHIRE, CT 06410

06410 1014790



United States Coast Guard
c/o Milone & MacBroom Inc.
Attn. Jeanine Gouin

Dear Ms. Gouin,

August 22, 2018

You have requested written comments re: the proposed Coast Guard Museum in New London. I feel it needs to be examined from 3 points of view - aesthetically, practicality, and legally.

Aesthetically:

Why is the Union Station not in this picture ? Why not another picture showing the juxtaposition on the two buildings? This is a building on the National Historic Register and is presently the anchor for State Street. These buildings will be neighbors and it is important that they be looked at together. A 100 million dollar building of this magnitude needs space around it to be appreciated. It should not be squeezed onto 1/3 of an acre sharing a minimal space with another fine piece of architecture. This doesn't do either building justice.

Practicality:

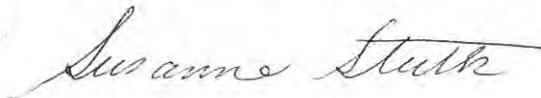
I'm not convinced this is going to save New London. I feel the parking shortage that exists already will not be solved by creating a need for the additional number of spaces required to accommodate the number of people they are expecting to visit every year. Why not use their 1/3 of an acre to run a jitney to another location and also serve the people coming by train and boat with no car? There is just too much being shoe horned into an inadequate space. The lack of funds is of course a huge practicality.

Legality:

I would assume the Coast Guard will want to set an example by respecting the regulations that have been set down for building on the waterfront and in the 100 year flood plain. Variances are only given out when the applicant has no alternative. Where is the "hardship" here? Just because the Coast Guard was given 1/3 of an acre on the waterfront it doesn't give them permission to build a 100 million building on it! They have other options.

I feel a lot more thought needs to be put into this decision

Sincerely,

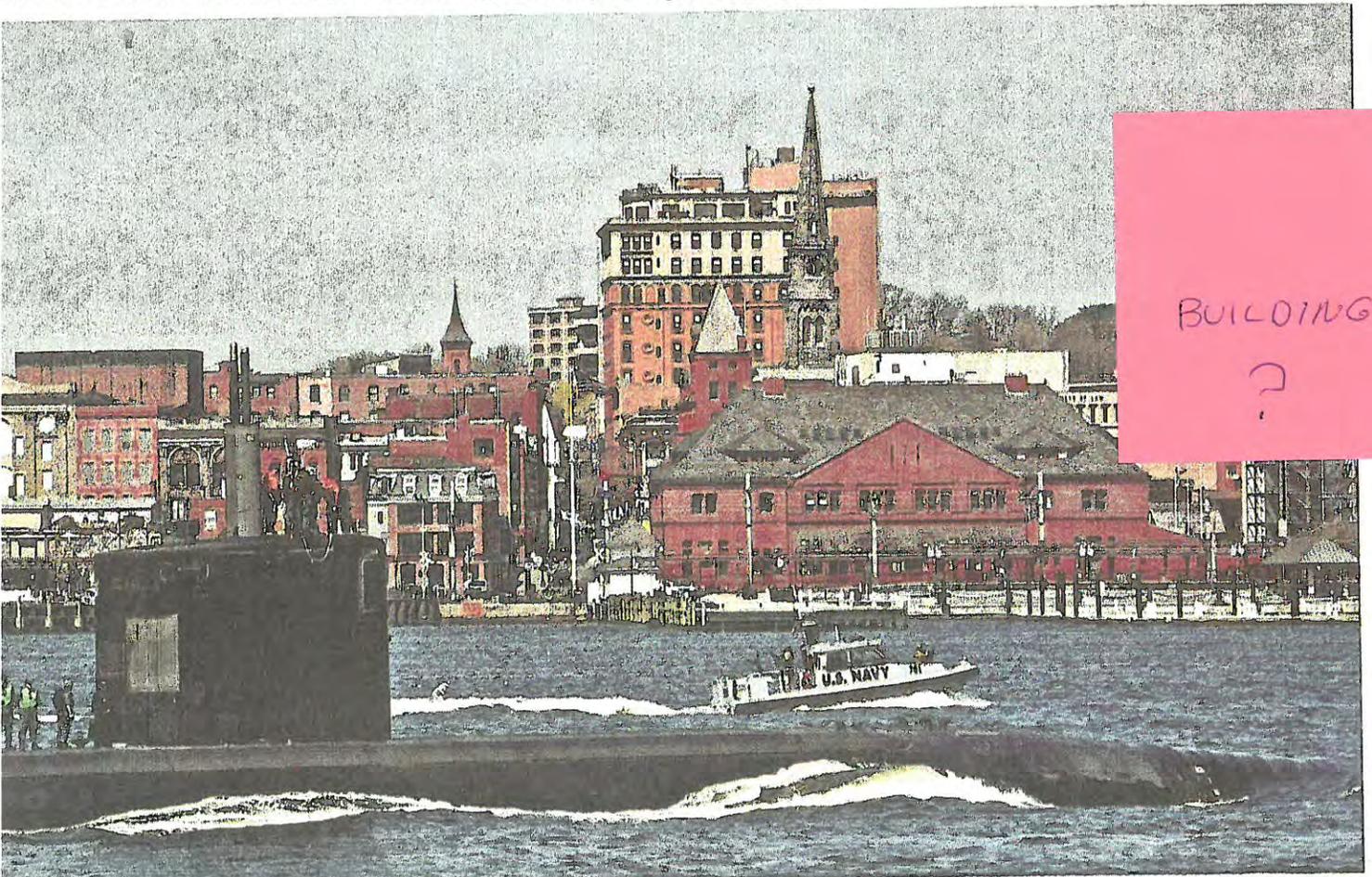


Susanne Stutts
10 Mill Pond Lane
Old Lyme CT, 06371
Former 24 year member, 8 as chairman of Old Lyme Zoning Board of Appeals



COURTESY OF NATIONAL COAST GUARD MUSEUM ASSOCIATION

The latest design, showing the proposed front entrance of the estimated \$100 million National Coast Guard Museum planned for the downtown New London waterfront, is seen in this rendering released Tuesday. The designs are by Boston-based architecture firm Payette, which the National Coast Guard Museum Association hired to design the museum.



BUILDING
?

From: Penny Newbury
To: [Jeanine Gouin](#)
Subject: comment on environmental assessment of museum site
Date: Tuesday, August 28, 2018 10:51:13 AM

August 28, 2018

Jeanine Gouin
Milone & McBroom

Dear Ms. Gouin:

I'm writing to comment on the environmental assessment conducted by Milone & McBroom for the US Coast Guard regarding the proposed siting of a future Coast Guard museum in downtown New London. I was a bit cowed by the length of the document, but I plowed through it, as did many acquaintances. It proved, as studies that have come before it proved, that if those commissioning the study ask those preparing it the right questions, anything can be proven. That's not why I'm writing—to dispute your findings on projected noise levels, contradict encroachment assurances, or quibble with the number of birds that may fly into the glass. The "environmental assessment" was commissioned by an entity that wanted a certain result, and your office complied.

While the assessment has included the detailed and damning testimony of several reputable engineering, environmental and land use groups regarding the folly, short-sightedness, illegality and danger of locating that structure on this site, and their repeated assertions that Fort Trumbull was the original, and preferred, site, it does not seem to address any of these points in sufficient detail or propose appropriate solutions. The main concern of all these opposing entities, I would argue, is the LOCATION of the building. This assessment, obviously, was not funded by people or groups interested in anything but the downtown site, and so did not address the obvious and popular solution, preferring to twist itself into a pretzel defending what I'm sure you all in your heart of hearts know to be an idiotic, and frankly sinister, choice.

I've also read the arguments in favor of keeping the museum downtown—99% being purely economic. Those opposed to the site *are not opposed to the museum*, and neither am I. There is no reason why it cannot be placed at Fort Trumbull. There is every reason why its placement on .34 acres of historic waterfront with no visual tie-in to new London's past, present or future represents one of the most abhorrent affronts to the concepts of smart growth, liveability, sense of place, and every issue that city planners and adaptive reuse experts have been espousing nationally for the past two decades. It's probably not your fault, but seriously, what are you thinking? Haven't you seen the outpouring of condemnation from every corner regarding the placement of this museum—in whatever iteration including this latest?

There will be no hordes of tourists. There will be no awards for design. There will be nothing except a few very happy wealthier individuals who slammed this monstrosity down the throats of the people who live, work and revere downtown New London.

The assessment does not care whether Fort Trumbull is a better location in every regard, including its ability to host the *Eagle*. That's not why it was commissioned. But it is indeed a very big part of how this assessment should be evaluated—not in its own vacuum of fewer birds flying into windows and lack of nearby hazardous substances.

I'm not going to comment on the many superfluous sections of the report that seemed designed only to wear out the dedicated reader to the point that he/she gives up and says "Okay, fine, I guess

there's so much information here that the site is indeed environmentally appropriate for that museum."

Is that what this assessment is designed to do?

An environmental assessment can be dead-on correct, and still be 100% misleading, wrong, short-sighted, and bloodless. If any of its authors knew anything about this area, I mean really knew anything, they would see that.

Thank you for your time.

Penny Newbury

Noank, CT

(860) 245-4956

29 August 2018

To: Jeanine Gouin, Milone and Macbroom

Fax: 203-272-9733 Pages: 5

From: Nancy d'Estang, PO 602, Old Mystic, Ct. 06372 (Tax payer)

Re: Responding to CGM proposal for New London

MYTHS LIES MYOPIA

May I support the document by Robert Fromer, which has been submitted to you. I with his professionalism and learned research/comments/facts.

- I. The Yale Urban Design Group's "Fort Trumbull Vision" is a comprehensive plan which has been dismissed by THE PLAYERS as "not meeting the CG requirements". That seems unlikely; the site chosen at the train station certainly does not meet requirements as seen by the multitude of adjustments which need to be made at the site. This is a true urban plan: appropriate for a community of 47,000 residents, compatible with community affordability and tourist needs, easy to secure, includes transportation, air, space, trees, grass, wading pool, band shell, "soft edges", history with the CG, vistas, sustainable and profitable. Mr. Papp said at the outset that there was not enough water depth for EAGLE at Fort Trumbull. That is not true. There are photos of EAGLE docked at FT, as well as tall ships and cargo vessels. (A 500 + foot destroyer was headed up there this summer. In addition, EAGLE is away most of the time, and winters in Baltimore annually for maintenance. Further the renowned Yale group has no skin in the game, therefore conflict of interest.
- II. Tony Sheridan and others have said that if the CG museum does not go at the train site, it will not come to NL. That is not true, as can be seen in the Fromer document.
- III. The August 1 DAY article said: 'the Coast Guard will determine whether there is a significant impact'. The "fox guarding the hen house"? This regards the environmental impact, one assumes. According to the Oxford, environmental includes: a set of circumstances or conditions, especially physical conditions in which a person or a community lives, works, develops; the region surrounding a place—context, setting.
- IV. Who bears the cost of the infrastructure, the maintenance, the police, fire and ambulance protection, of the flooding, the trash pick-up, the traffic congestion, the businesses close because of years of construction on this site?
- V. Determinations by the Coast Guard thus far in this project do not inspire confidence. Facts of climate change, the tiny over-burdened vulnerable site chosen, the glitzy "fair" design and materials, the unsustainable, non-securable, flood plain, high wind velocity location—do not build trust. It is as if the CG players are exempt from laws of nature.

- federal and state law, from community, state and federal financial truths, transportation infrastructure, terrorist and I-95 truths! Is this a "players vs. payers" situation?
- VI. Costs: the 100 million figure is still used in the Aug. 1, 2018 article. It is expected that the digging will begin in 2021; the CG must have a projected cost for that time. When will that be revealed?
- VII. Back to the proposed design itself: Does it fit the expectations of a major addition to New London? i.e. suits the community, has a social conscience, uses materials appropriate to its context in New London? The front page photo of the Richardson train station (The City of 26 August) seems to tell all: the station is impressive, suitable, traditional, iconic, a lasting monument to the designer. There are now 3 trains every 15 minutes of these tracks. Although there had been plans to tear it down, the surrounding communities' members have insisted on its preservation. (Surely PLAYERS could come up with ways to make it more useful and inviting!----rather than forging ahead as "The Great Exhibitionists".)
- VIII. See attached article regarding the evolution in Westerly, as opposed to what is proposed by the CG for NL: "Sweet Song Playing Out in Westerly with Fundraising for ARTS CENTER" which is a multifaceted project " which will include dance, book shop, art galleries, micro-theater, classrooms, master classes, visiting musicians, the philharmonic—a project for all ages, all pocket books, all backgrounds—a multi- building re-use art campus. Note too that the art co-op has moved into the train station, reviving its use for passengers as well as gallery visitors now.
- IX. Please do not make further mistakes in New London. Heed what is happening in Westerly where the residents' ideas for green, trees, comfort, hospitality, bike paths and playgrounds were dismissed.

Thank you for regarding these remarks and this attached material.

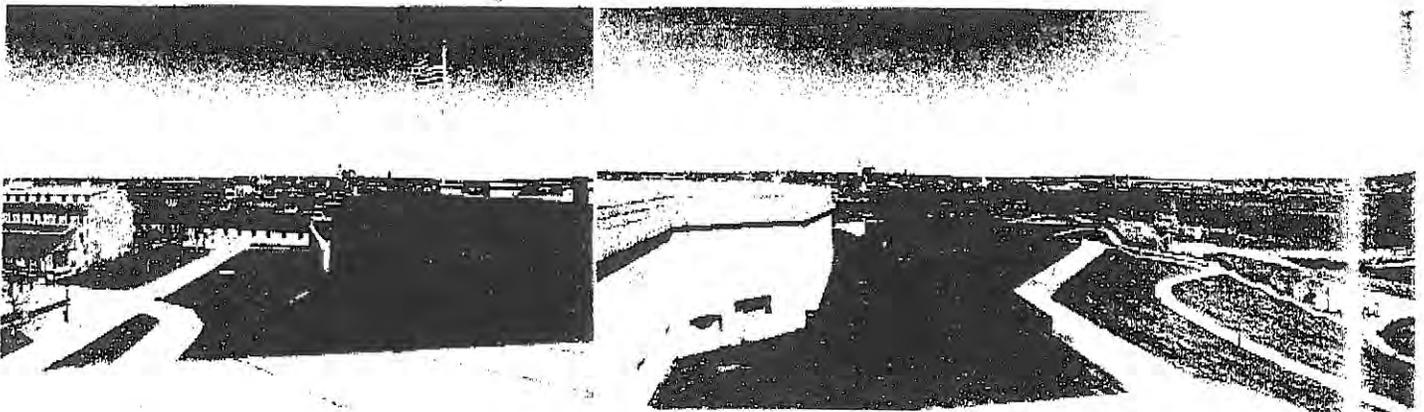
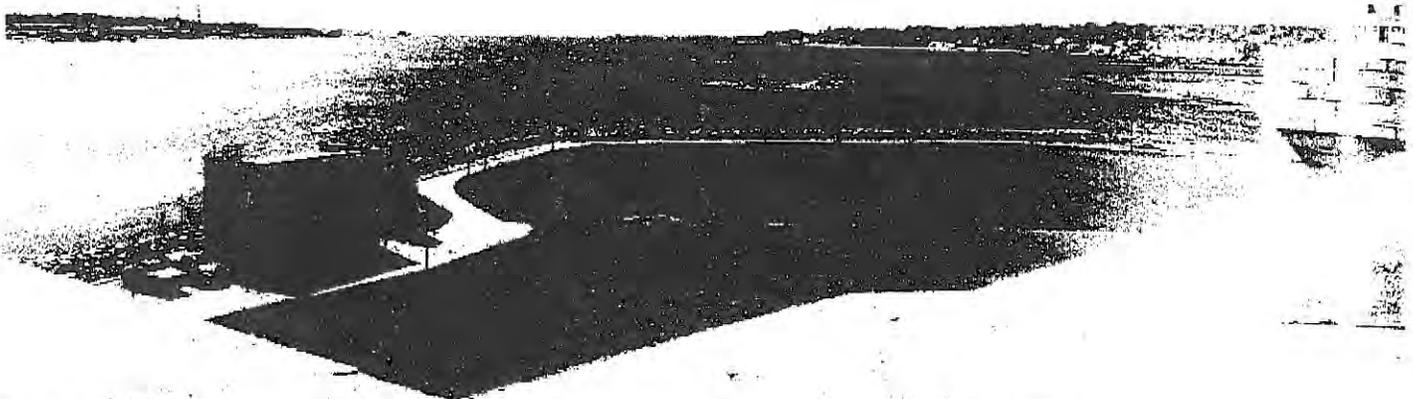
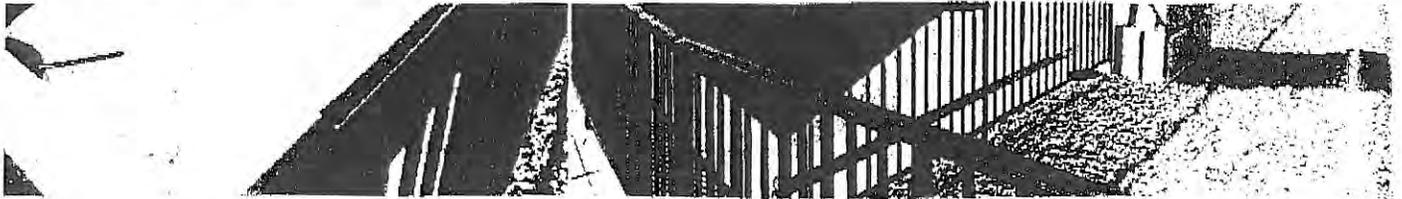
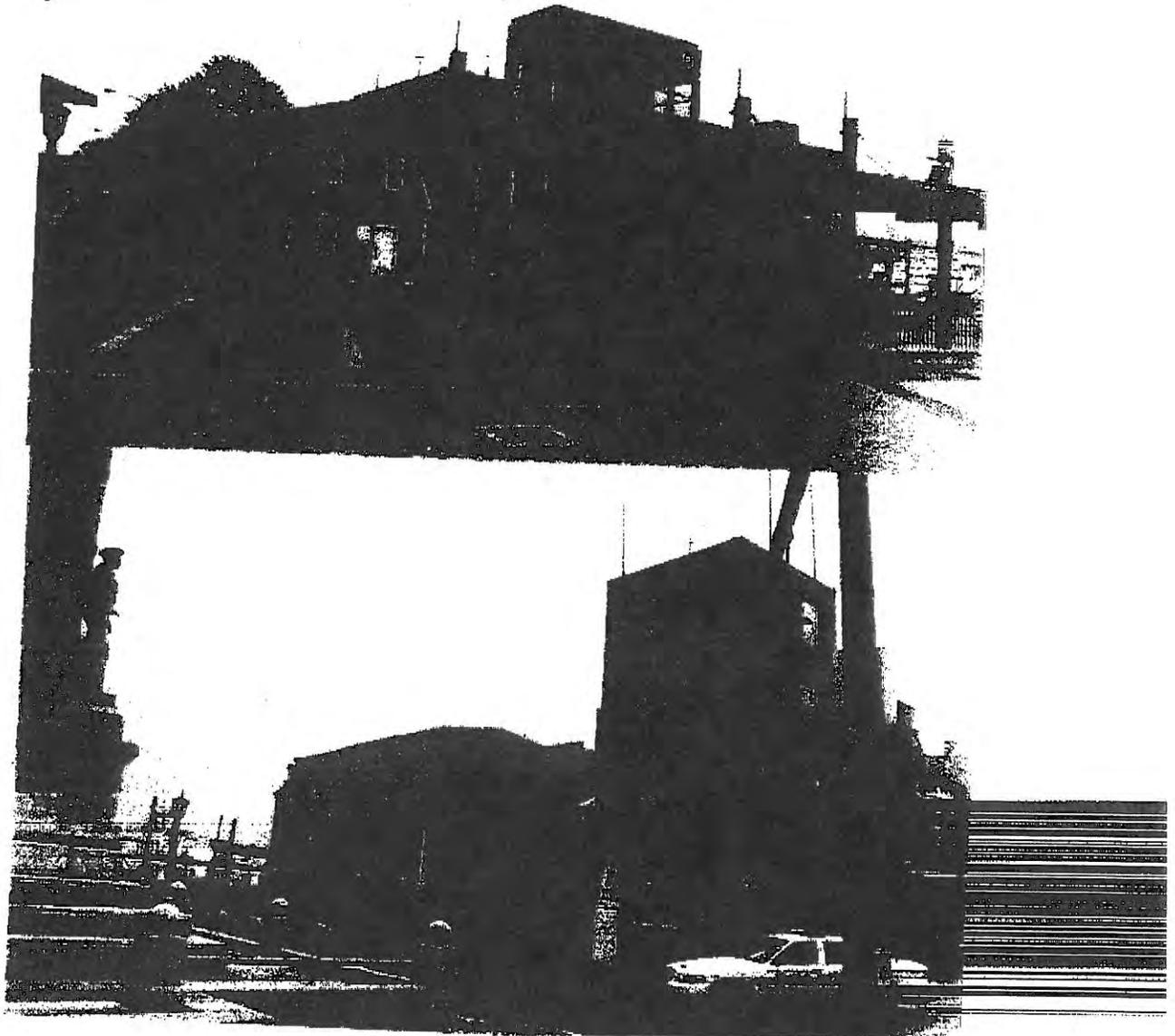
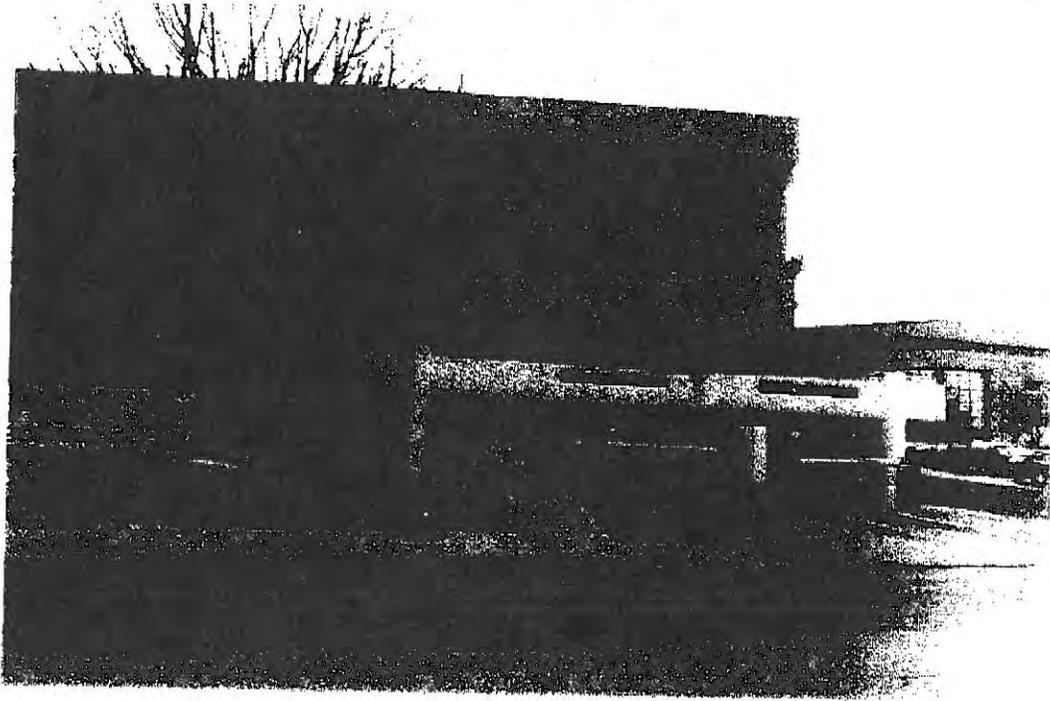


Photo file review



4.9.2 Consistency with Conservation and Development Policies Plan for Connecticut

The downtown New London waterfront area has been designated as a Conservation Area under the *Conservation and Development Policies Plan for Connecticut* (2013-2018) because of its location within a floodplain. Growth Management Principle #5 of the Plan strives to promote and ensure the integrity of Environmental Assets critical to public health and safety. The following policy is of interest in light of the proposed pedestrian overpass.

Policy: Discourage new development activities within floodway and floodplain areas, manage any unavoidable activities in such areas in an environmentally sensitive manner and in compliance with applicable laws, and seek to prevent the loss of life and property by maintaining existing dikes, channels, dams, and other barriers, or removing such structures where removal would be a more cost-effective option for reducing threats to downstream property.

Consistent with the State Plan policy, the proposed overpass will be constructed to withstand flooding impacts and will be designed to be in full compliance with local building and excavation codes and coastal management policies and regulations. Additionally, the overpass will comply with state and federal policies and regulations as described in Section 4.9.3.

4.9.3 Consistency with State and Federal Regulations and Statutes

Because state funds are involved, this project must be certified as being in compliance with flood and stormwater management standards specified in Section 25-68 of the CGS and Section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA).

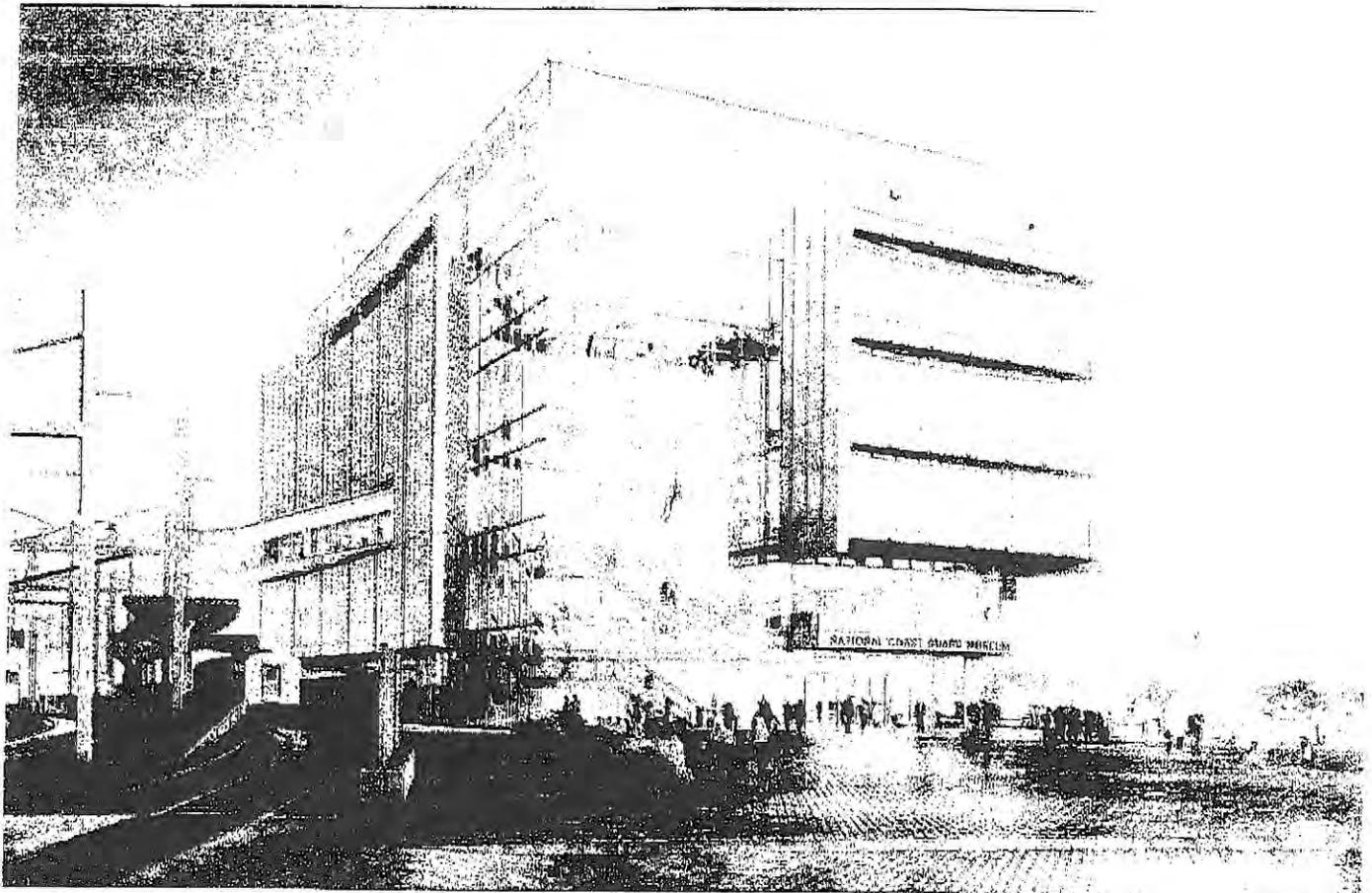
- State policy promotes long-term nonintensive uses for projects within flood hazard areas, with utilities located to discourage floodplain development. State policy regarding floodplain development is articulated in Section 25-68(b)(4) of the CGS, requiring that a
- proposed action promote long-term nonintensive floodplain uses and have its utilities located to discourage floodplain development. This policy invokes a higher standard than the engineering standards contained in federal or municipal floodplain regulatory

In order to certify the proposed action, it must be determined to be a nonintensive use of the floodplain. The determination of whether a specific proposal is considered nonintensive requires examination of numerous factors, including the existing state of the floodplain and its natural resources, the types of uses proposed for the floodplain area, the design of the entire proposal and the extent of encroachment into the floodplain, and the availability of alternatives to siting within the floodplain. In order to ensure compliance with state policy, any proposed development must not result in more intensive uses of the floodplain than presently exist.

- Intensive floodplain uses have been interpreted by the DEEP to include:

new designs show a much more opaque structure on the waterfront side, with long metal panels breaking up the glass to help prevent bird strikes and to address concerns from the Coast Guard Museum Association.

Coast Guard Museum's new look



COURTESY OF NATIONAL COAST GUARD MUSEUM ASSOCIATION

Latest design, showing the proposed front entrance of the estimated \$100 million National Coast Guard Museum planned for the downtown New London waterfront, is seen in this rendering released Tuesday. The designs are by Boston-based architecture firm Payette, which the National Coast Guard Museum Association hired to design the museum.

Public comments sought on environmental impact of construction

LIA BERGMAN
Staff Writer

New London — The Coast Guard, seeking public comment on a review of the environmental impacts of building the National Coast Guard Museum on the downtown waterfront, has released the museum's latest design.

The review, officially known as a supplemental environmental assessment, is required under the National Environmental Policy Act and outlines the environmental impacts of proposed construction. It also details the need for the acquisition of an additional 14,200 square feet of land, 11 of which is submerged land

beneath the City Pier platform and along the Thames River adjacent to the proposed site of the museum.

A draft version of the assessment will be available for comment for 30 days beginning today. After the public comment period, the Coast Guard will determine whether there is a finding of no significant impact, meaning the project can proceed, or will identify outstanding issues that need to be addressed.

The proposed site of the estimated \$100 million museum is adjacent to Union Station on one-third of an acre of land that the city donated to the Coast Guard in 2014. The site is in a 100-year flood zone, which complicates the design and construction process.

Site testing began in mid-July and is expected to last about a month. The

museum association recently hired two Connecticut based firms for pre-construction work.

An updated cost estimate for the project isn't expected until the design is finalized, with construction tentatively scheduled to begin in 2021. But that is subject to change. So far, \$37.1 million has been raised by the National Coast Guard Museum Association, including \$5 million from the federal government and \$20 million from the state.

Environmental assessments were performed in 2002, 2008 and 2014, which concluded in a finding of no significant impact. It was after the 2014 assessment that the land adjacent to Union Station was transferred from the City of New London to the Coast Guard.

HOW TO COMMENT

Comments on the draft environmental assessment are invited and can be downloaded at www.coastguardmuseum.org or can be reviewed in person at the Public Library of New London, 65 Park Street, Suite 101, New London, 06320. For more information, contact the National Coast Guard Museum Association at www.natcoastguardmuseum.org, 510 Water Street, Room 101, New London, 06320.

Written comments should be submitted by Sept. 11, 2018, to: Lia Bergman, Staff Writer, c/o The Public Library of New London, 65 Park Street, Suite 101, New London, 06320. Comments can also be submitted to lia.bergman@natcoastguardmuseum.org.

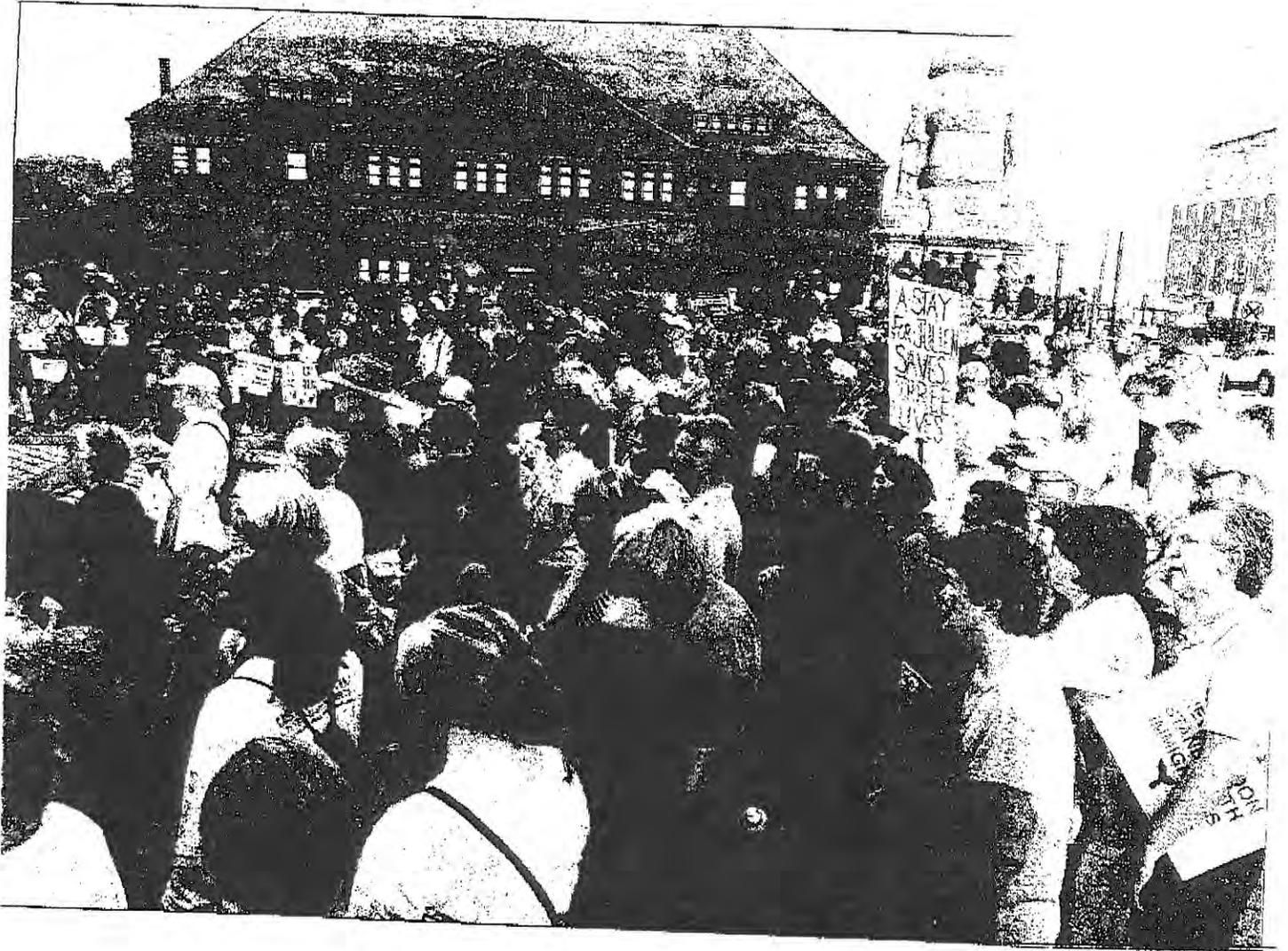
SEE COAST GUARD PAGE A5

TUESDAY, AUGUST 28, 2018

VOL. 138, NO. 58 20 PAGES

NEW ENGLAND NEWSPAPER

COMMUNITY OUTPOURING



FT Weekend

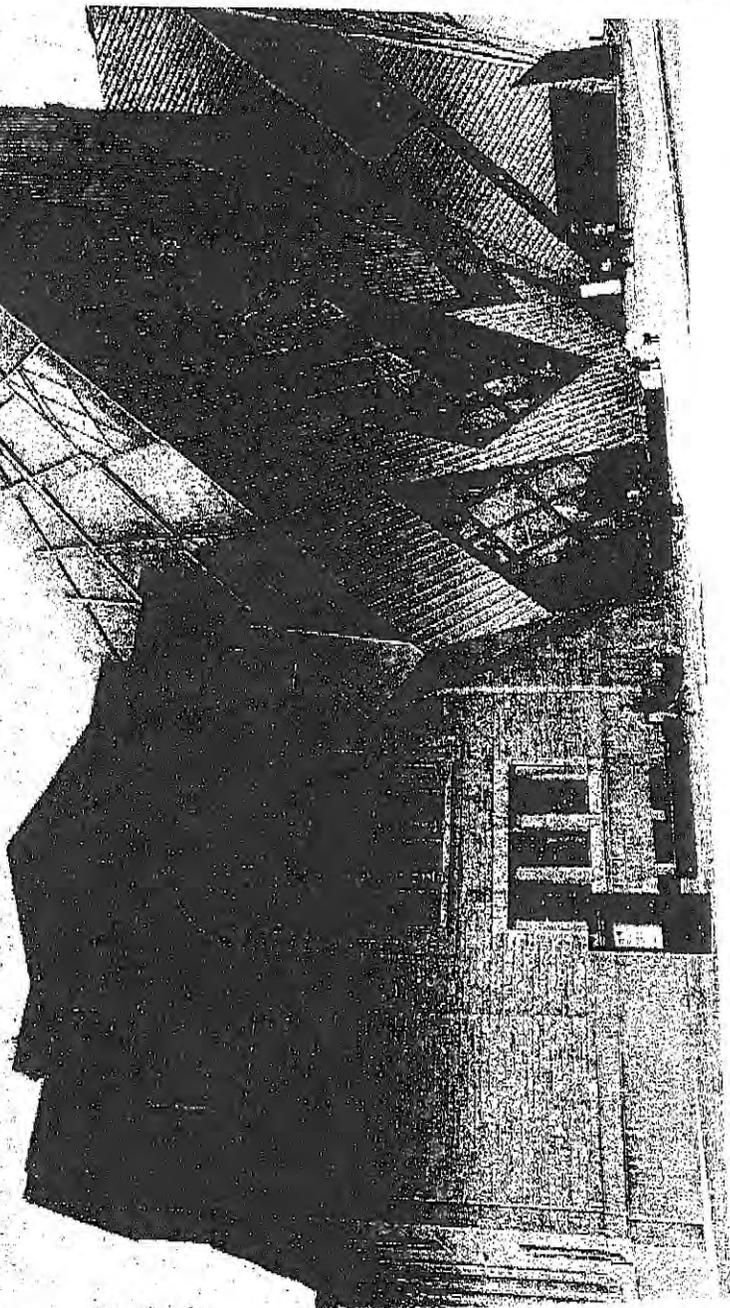
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House&Home

The great exhibitionists

Perspective: architecture | Daring museum extensions that fail to respect place and context can end up as monstrosities, comments *Marcus Binney*



ROBERT FROMER
EJD, MSEE, P.C., P.E.

E-mail: saintrobert@comcast.net

August 29, 2018

Sent via Fax to: 1 (203) 272-9733
Sent via Electronic Mail to: jgouin@mminc.com

Re: Comments on the Draft Supplemental Environmental Assessment for the proposed National Coast Guard Museum

United States Coast Guard
c/o Milone & MacBroom, Inc.
(Attention: Jeanine Gouin)
99 Realty Drive
Cheshire, CT 06410

Dear Ms Gouin:

My name is Robert Fromer, and I provide the following comments on the Draft Supplemental Environmental Assessment (“SEA”) for the National Coast Guard Museum (“Museum”) dated July 24, 2018. My commentary on the 2014 Environmental Assessment (“2014 EA”) are incorporated herein and made a part thereof by reference.

The SEA is substantively and procedurally noncompliant with the National Environmental Policy Act (“NEPA”) of 1969 and implementing regulations and instructions. Also, there are significant impacts justifying an Environmental Impact Statement (“EIS”). My comments debunk, refute and contradict the claims specifically made in the Cover Page and Introduction that the SEA and 2014 EA were developed in accordance with NEPA as implemented.

The Museum is still a fragile "glass palace" and illegally located on the waterfront. If climate change occurs according to the preponderance of scientific evidence, this Museum is “doomed.”

Milone and MacBroom has prepared the SEA to justify the United States Coast Guard (“CG”) issuing a Finding of No Significant Impact (“FONSI”).

EXECUTIVE SUMMARY

Proposed Action

“The Proposed Action, as described in the SEA, consisted of United States CG acquisition, by gift, of a 0.34-acre parcel of land on Water Street in downtown New London, allowing the National Coast Guard Museum Association (“Association”) to construct a museum on the acquired property, and potential acquisition and long-term operation of the museum by the CG. The CG acquired the 0.34-acre parcel from the City of New London in 2014. [C]hanges to the Proposed Action as evaluated in the subject SEA include the acquisition of additional land as well as changes to the museum design that affect its size, footprint, related in-water activities, and the overall relationship of the building to the surrounding area. Since construction of a museum would be an indirect effect of the proposed CG actions, the potential impacts of such construction and long term operation are evaluated herein.” (Parenthetical added.)(SEA, section 2.3, p. 2-1)

“The conclusion of the ... screening analysis is that, based on the museum needs and site constraints, an 80,000-square-foot museum can be accommodated at the project location and is large enough to support the critical functions of the facility. As such, an 80,000-square-foot museum is evaluated herein.... [T]he 80,000 square feet refers to the gross square footage of usable building area and does not include the open or enclosed areas on the ground level, which are intended to serve a loading dock, entrance, storage, and other unoccupied areas as allowed by Federal Emergency Management Agency (“FEMA”) regulations for uses within a designated flood zone.” (SEA, section 2.3, p. 2-2)

Museum Function and Programming

A Virtual Museum and the Fort Trumbull option can provide the same museum function and programming without the adverse environmental impacts of the downtown location.

Environmental Factors Considered

The Introduction in SEA lays out the process for the CG to acquire land and construct the Museum. However, neither the past nor the following comments will alter the predetermined decision made by Admiral Robert Papp in collaboration with the Association to irrationally and unreasonably locate the Museum in the downtown area.

Neither the SEA nor the 2014 EA considered the annual and life time energy consumption for heating/ventilation/air conditioning, embodied energy, nonwater dependency of the Museum, Greenhouse Gas (“GHG”) production, and degradation of visual quality through significant alteration of the natural features of vistas and viewpoints in Chapter 4.0 (Environmental Consequences). Scenic vistas/viewpoints lie in the public domain. So, to the public, it appears that the CG performed due diligence when the scope of consideration is really quite limited and requires expansion of factors.

NEPA requires that all reasonable alternatives be rigorously explored and objectively evaluated. In addition, alternatives that are eliminated from detailed study must be identified, along with a brief discussion of the reasons for eliminating them.

Several alternatives cited in section 2.2 of the SEA were suggested during scoping for the 2014 EA. Alternatives suggested included a Virtual Museum over the Internet ... and Fort Trumbull State Park. A brief description of both alternatives, and the reason each was preemptorily eliminated from detailed assessments and evaluations of the factors in Chapters 3.0 and 4.0:

- Virtual Museum – Although a virtual museum may be a valuable tool for any museum, it does not meet the purpose and need to adequately preserve, record, and display the Coast Guard’s history and artifacts. A virtual or web-based museum was considered in previous EAs prepared by the Coast Guard for the Museum, and this alternative was also eliminated from further analysis.
- Fort Trumbull State Park – As described previously, the Fort Trumbull alternatives have been considered in previous Coast Guard EAs. These alternatives have been incorporated by reference, and will be considered in the Coast Guard’s decision on the Proposed Action.

Significance of Consequences

The finding of insignificance for the considered factors is not dispositive of the issue because the SEA omitted considering the significance of other specific environmental impacts and their cumulative effects. As a result, the significance of impacts is indeterminate because pre-selection of the site and failure to consider other primary environmental factors has resulted in the incompleteness of the SEA.

The SEA necessitates an expansion of the 2014 EA to include such other factors as consistency with coastal management, life-cycle energy consumption, GHG production, sea level rise attributed to climate change, and degradation of visual quality through significant alteration of natural vistas and viewpoints which are in the public domain.

Federal Statute Authorizing the Museum

In section 98 of Title 14 of the United States Code (“14 USC § 98”) permitting establishment of the Museum, Congress did not establish a purpose and need for the facility. The Association crafted and tailored the purpose and need to suit its organizational mission. Also, Congress neither mandated creation of the Museum nor established of any specific form it may take — whether physical or virtual. Further, Congress omitted statutorily establishing that the Museum is in the **National Interest**. Finally, the statute requires locating the Museum in the [undefined] **vicinity** of City of New London (“City”) and not limited to a location within the geographical boundaries of the City.

Purpose and Need

“The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” 40 CFR Sec. 1502.13 [Purpose and need]. The operative word is “**responding**”, not “**creating**.”

“The purpose of the Proposed Action is to establish a NCGM that is capable of adequately preserving, recording, and displaying the Coast Guard's history and artifacts and that would be established in accordance with 14 USC § 98 – privately constructed on land gifted to the Coast Guard in New London and in close proximity to the Coast Guard Academy. The need for the Proposed Action is based on the limited space and functional constraints of the existing Coast Guard Museum and the inability of the existing Coast Guard Museum to effectively tell the story of the Coast Guard.” (SEA, Section 1.4, p. 1-7)

According to the Association’s website, the prime purpose of the Museum is public education about the CG through exposure to its artifacts. A feasible and prudent alternative to the proposed Museum is a Virtual National Coast Guard Museum (“Virtual Museum”) and television channel for the whole world. In this Digital Age, all artifacts can be scanned in 3-dimensions and provided on the Internet alleviating the need for a structure and transportation to the site. The Smithsonian Institution is scanning all of its 137 million exhibits in 3-dimensions for public display on the Internet alleviating the need to visit its sites, which would save considerable energy.

The SEA is creating the purpose and need and not in response to any Congressional act.

The purpose for the Museum only exists because of the obsession of Admiral Papp and Mr. Coleman. The purpose and need for the Museum can be readily achieved without design, siting, and construction of an 80,000 square foot building through the creation, development and operation of a Virtual Museum and a new television channel originating from the CG Academy, which would fully satisfy 14 USC § 98.

The SEA process is a sham, pretentious, and contrived because Admiral Papp, former Commandant of the CG, in close cooperation and coordination with Connecticut Governor Dannell Malloy, former City Mayor Daryl Finizio, the Association, and Mr. Bob Ross, Executive

Director of the Connecticut Office of Military Affairs, pre-selected the proposal by the Association to locate the Museum on a parcel of land owned by the City unilaterally decided based on the offer of land by the City that the proposed site is the preferred alternative before preparation of the 2014 EA and SEA. Once again, **the SEA essentially justifies the site contrary to the planning purposes of NEPA.**

Environmental Impacts

Significance of Impacts

The significance of impacts is indeterminate because pre-selection of the site and failure to consider the environmental effects – adverse and beneficial - other primary environmental factors has resulted in the incompleteness of the SEA.

Coastal Resource Impacts

Consistency with Connecticut Coastal Management Act/Coastal Program

The Museum is a non-water dependent use as defined in Section 22a-93(16) of the Connecticut General Statutes (“CGS”) on a site suitable for a water dependent use according to the Connecticut Coast Management Act (“CCMA”) and its legislative history. As a result, the design and construction of the Museum for the proposed site is inconsistent with the goals and enforceable policies of CCMA. The issue of water dependency for the Fort Trumbull location is not pertinent because of the Riverwalk barring direct access to the Thames River.

In its letter to Governor Malloy dated January 26, 2012, Cross sound Ferry opposed the downtown location of the Museum adjoining its future potential ferry development and opportunities.

Tables 4.7-2, 4.7-3, and 4.7-4 contain significant false claims of applicability/non-applicability.

Prior to any final decision, the CG should submit an application to the Connecticut Department of Energy and Environmental Protection pursuant to Section 307(c)(1) of the federal Coastal Zone Management Act, as amended, Subpart C of 15 Code of Federal Regulations (“CFR”) Part 930 and Section II, Part VII(c) of the federally approved Connecticut Coastal Management Program and Final Environmental Impact Statement. The application should request a review of the proposed Museum for consistency with the enforceable goals and policies of Connecticut's federally approved Coastal Management Program as contained in Sections 22a-90 through 22a-112 of the Connecticut General Statutes. The policies in the Coastal Management Act do not exempt any federal facility or use from the federal consistency requirements of Section 307 of the federal Coastal Zone Management Act. See **Appendix 1**.

The review should determine whether:

- (a) The Museum is a water dependent use.
- (b) The site is suitable or planned for location of a water dependent use.
- (c) The Museum replaces a water dependent use with a non-water dependent use
- (d) There would be an adverse impact on water-dependent Uses and Future Water-dependent Development Opportunities.
- (e) There would be an Adverse Impact on Coastal Resources: Degradation of Visual Quality.

The SEA does not address the projected rise in sea level and its future impact on the Museum.

Visual Resource Impacts

The proposed modernistic architecture for the Museum defiles, demeans, and denigrates the architecture and character of the railroad station - designed by Henry Hobson Richardson - which is on the National Historic Register - and surrounding buildings as well as the coastal views and vistas on both sides of the Thames River, which reside in the public domain. This is contrary to the Connecticut Coastal Management Act for coastal vistas and viewpoints. The Museum's design is simply insensitive, garish, grotesque and incompatible with the surrounding architecture when viewed from any angle. It is out of character to the surrounding architecture.

Energy Resources

The CG is obligated to consider energy as a Chapter 3.0 Affected Resource with Chapter 4.0 Environmental Impacts from construction of the Museum.

With climate change a given phenomena, the most significant environmental factor warranting quantifiable analytical consideration is the projected energy consumption and greenhouse gases ("GHG") produced over the life cycle of the project - from "cradle to grave." The purpose for such consideration is the need to substantially minimize both energy consumption and the production of GHGs. It would be a gross waste of embodied energy for the CG to find it necessary to abandon the building in future years due to costs and limited fossil fuel supplies. This, also, constitutes a significant impact.

Alternatives

In the absence of selection criteria, the SEA only considered the No Action and Preferred alternatives without a comparative analysis of all feasible options. There is no ranking of the affected and consequential environmental factors with assigned weights for significance and other parameters. Hence, there is no comparative analysis for each of the other possible

alternatives as the objective/subjective basis for selecting the preferred alternative as the most feasible and prudent option.

There are numerous alternatives to the downtown New London parcel, which would result in far less environmental impacts and need for mitigation. Placing the Museum in downtown New London is the equivalent of trying to put “two pounds of sausage in a one pound bag.”

The Virtual Museum would result in zero impacts. The Fort Trumbull site does not pose a water dependency issue because access to the Thames River is blocked by a publicly owned walkway (aka River Walk), which land locks the peninsula.

Transportation Impacts

The Intermodal Transportation Study prepared for the Southeastern Council of Government (“SCCOG”) does not foresee the need for an elevated Pedestrian Overpass, and there has never been any evidence of any pedestrian accidents on Water Street necessitating such a walkway. Neither the USCG nor its supporters have demonstrated a public safety issue necessitating a walkway. Approximately four (4) years ago, New London electors voted against such infrastructure using federal funds.

At certain times of the day, Water and Bank Streets become traffic “choke points” worsened at SailFest

Historic Railroad Station

The proposed modernistic architecture for the Museum defiles, demeans, and denigrates the architecture and character of the railroad station - designed by Henry Hobson Richardson - which is on the National Historic Register - and surrounding buildings as well as the coastal views and vistas on both sides of the Thames River, which reside in the public domain. This is contrary to the Connecticut Coastal Management Act for coastal vistas and viewpoints. The Museum’s design is simply insensitive, garish, grotesque and incompatible with the surrounding architecture.

Social Impacts

Is the Coast Guard, the guardian of the coast, really going to build their museum in a storm-prone flood plain with difficult access for the handicapped? The SEA should analyze the social impacts from the perspective of a handicapped person trying to wrestle with the idea of finding a parking space in a congested area, and negotiating a bridge/elevator complex to gain access.

Mitigation

In a separate section within Chapter 4.0 of a new Chapter 5.0, the SEA fails to address mitigation of adverse environmental impacts.

Conclusion

The SEA is creating the purpose and need and not in response to any Congressional act.

The above summarized commentary justifies preparation of an EIS. The Museum is not a water-dependent use according to the Connecticut Coastal Management Act and its legislative history on a site suitable for such use. This constitutes a significant individual impact in addition to the significant impacts from life-cycle energy consumption, GHG production, and the degradation of visual access.

The downtown location was predetermined and SEA is its justification.

Placing the Museum in downtown New London is the equivalent of trying to put “two pounds of sausage in a one pound bag.”

All CG artifacts can be scanned into 3-dimension holographic images for worldwide viewing on the Internet. As a result, the Virtual Museum would result in zero impacts. The Fort Trumbull site does not pose a water dependency issue because access to the Thames River is blocked by a publicly owned River Walk, which land locks the peninsula.

It's time for the CG to develop its **Museum of the 21st Century for the World** instead of physical structures. Perhaps, the CG's leadership can reinvent its focus to look forward and think outside-of-the-box. For example, a helicopter whose windows will be outfitted with virtual-reality screens will recreate storm conditions under which the Coast Guard rescues imperiled boaters. The CG can show the same reality by selling helicopter simulation games or presenting it on the Internet without the need for a building.

I. INTRODUCTION

Sheet pilings are neither depicted nor identified in SEA Figures 2.3-1 and 2.3-2.

Public Notice

On August 1, 2018, the Day Publishing Company, New London, Connecticut published the Notice by the CG announcing the availability of the SEA for its proposed Museum in New London, Connecticut.¹

Predetermination

Neither the following comments nor the findings in a possibly future EIS will alter the predetermined decision made by Admiral Robert Papp in collaboration with the Association to irrationally and unreasonably locate the Museum in the downtown area contrary to the planning purposes in NEPA. The downtown location was predetermined and SEA is its justification

¹ The United States Coast Guard (USCG) announces the availability of a Supplemental Environmental Assessment (SEA) for the proposed National Coast Guard Museum (NCGM) in New London, Connecticut. The SEA supplements the 2014 EA to address changes to the proposed action, including potential acquisition of land by the Coast Guard, and changes to the proposed Museum design by the National Coast Guard Museum Association, Inc.... a Connecticut non-profit corporation. The SEA was prepared pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations (40 CFR parts 1500-1508), and the Coast Guard's NEPA implementing procedures (COMDTINST M16475.1D). The EA also fulfills the requirements or provides necessary analysis for review under Section 106 of the National Historic Preservation Act of 1966 (30 CFR Part 800), Section 7 of the Endangered Species Act of 1973, and the Connecticut Department of Energy and Environmental Protection's (CTDEEP) Coastal Consistency Review requirements. The Draft SEA describes the need for the project and the environmental impacts of the proposed action. The cumulative impacts of the proposed Museum in connection with other independent but related projects were also evaluated. The Draft SEA will serve as a concise public document to briefly provide sufficient evidence and analysis for determining the need to prepare an Environmental Impact Statement (EIS) or a FONSI.

II. APPLICABLE LAW

Title 14 USC § 98² provides that the USCG may establish the Museum. However, Congress did not envision that the Museum was essential because the statute does not contain mandatory language for its creation. Additionally, the federal statute, also, contains provisions limiting expenditures for engineering, design, construction, operation and maintenance of the Museum.

Title 40 Code of Federal Regulations (“CFR”) Part 1500.1(b) provides in pertinent part as follows, “NEPA procedures must insure that environmental information is available to public officials and citizens **before decisions are made and before actions are taken**. . . .” (Emphasis added.) Further Part 1500.1(c) provides in pertinent part “[t]he NEPA process is intended to **help public officials make decisions** that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment. These regulations provide the direction to achieve this purpose.” (Emphasis added.)

NEPA and COMINST

Purpose and Need

“The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” 40 CFR Sec. 1502.13 [Purpose and need]. The operative word is “**responding**”, not “**creating**.”

The SEA is creating the purpose and need and not in response to any Congressional act.

² 14 United States Code §98. National Coast Guard Museum.

(a) Establishment.—The Commandant may establish a National Coast Guard Museum, on lands which will be federally owned and administered by the Coast Guard, and are located in New London, Connecticut, at, or in close proximity to, the Coast Guard Academy.

(b) Limitation on Expenditures. — (1) Except as provided in paragraph (2), the Secretary shall not expend any appropriated Federal funds for the engineering, design, or construction of any museum established under this section.

(2) The Secretary shall fund the operation and maintenance of the National Coast Guard Museum with nonappropriated and non-Federal funds to the maximum extent practicable. The priority use of Federal operation and maintenance funds should be to preserve and protect historic Coast Guard artifacts.

(c) Funding Plan.—Before the date on which the Commandant establishes a museum under subsection (a), the Commandant shall provide to the Committee on Commerce, Science, and Transportation of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives a plan for constructing, operating, and maintaining such a museum, including — (1) estimated planning, engineering, design, construction, operation, and maintenance costs;

(2) the extent to which appropriated, nonappropriated, and non-Federal funds will be used for such purposes, including the extent to which there is any shortfall in funding for engineering, design, or construction; and

(3) a certification by the Inspector General of the department in which the Coast Guard is operating that the estimates provided pursuant to paragraphs (1) and (2) are reasonable and realistic.

(d) Authority.—The Commandant may not establish a Coast Guard museum except as set forth in this

Pertinent definitions are found at: 40 CFR §1508.7 (cumulative impact); 40 CFR §1508.8 (direct and indirect effects); 40 CFR §1508.9 (environmental assessment); 40 CFR §1508.13 (finding of no significant impact); and 40 CFR §1508.18 (major federal action)³

Definition of Impacts

Title 40 CFR 1508.9(a) defines EA to mean: “[A] concise public document for which a Federal agency is responsible that serves to: (1) Briefly provide sufficient evidence and **analysis** for determining whether to prepare an environmental impact statement or a finding of no significant impact; and (2) aid an agency’s compliance with the Act when no environmental impact statement is necessary.” (Emphasis added.)

Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 CFR 1508.7

Effects include: (a) Direct effects, which are caused by the action and occur at the same time and place; and (b) Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. Effects and impacts as used in these regulations are synonymous. Effects includes ecological impacts (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial. 40 CFR 1508.8

³ *Major federal action.*

Major federal action” includes actions with effects that may be major and which are potentially subject to federal control and responsibility. Major reinforces but does not have a meaning independent of significantly (§1508.27). . . .

(b) Federal actions tend to fall within one of the following categories:

(3) Adoption of programs, such as a group of concerted actions to implement a specific policy or plan; systematic and connected agency decisions allocating agency resources to implement a specific statutory program or executive directive. (Emphasis added.)

III. COMMENTS ON SITE PRE-SELECTION

The CG did not establish selection criteria for the preferred alternative prior to the scoping effort. See Fromer Comments in 2014 EA, Appendix F [Composition of Prior Selection Committee and Selection Criteria]⁴. Neither did the CG establish selection criteria prior to preparation of SEA. And, the outcome of the scoping process neither identified the rankings nor assigned significance weights for environmental factors instead of tailoring the desired results to justify the preferred location.

The purpose of NEPA is to ensure systematic consideration of environmental risks at the early stages of planning before the CG commits its resources to the particular use of a site. Because the project could "arguably damage the environment," the CG has a duty to comply with NEPA's requirement for preparation of SEA, which requires a determination of the preferred alternative site determinatively concluded from the impacts not presumptively because of corrupting political interferences on environmental planning. See Scenic Hudson Preservation Conference v. Federal Power Com., 354 F2d 608, 618-620 (1965, CA2). "[I]n viewing the public interest, the Commission's vision is not to be limited to the horizons of the private parties to the proceeding." Michigan Consolidated Gas Co. v. Federal Power Comm., 108 US App DC 409, 283 F2d 204, 224- 226, cert den 364 US 912, 81S Ct 276 (1960).

The SEA does not practically serve as an important contribution to the decision-making process and was used to rationalize or justify decisions already made. Preparation of an evaluation should not prevent the CG from conducting contemporaneous engineering, economic, feasibility and other studies which do not otherwise commit the agency to commence or engage in such action or limit the choice of reasonable alternatives.

The CG and supporters fail to comprehend the meaning of the "Planning Function," which is to plan rather than justify the proposed action.

⁴ Selection Committee scoring records not released under Fromer's Freedom of Information Act request; FOIA No. 01-2006, Oct 2, 2001.

IV. COMMENTS ON THE ENVIRONMENTAL FACTORS

The following comments pertain to the SEA, Chapter 4's environmental consequences:

1. Air Quality Impacts

Claim #1: "Air pollutant and GHG emissions associated with operation of the completed Museum would primarily be the result of vehicle trips by workers and museum patrons. The building itself would have very little local emissions." (SEA 4.3.2, page 4-4)

Rebuttal #1: This impact statement is purely subjective – merely unverified claims; it needs quantification and proof.

Claim #2: "The Museum heating system (anticipated to be a natural gas boiler/heating unit with additional power from photovoltaic units) would produce emissions; however, the emissions produced by this type of heating system would be minor. The building would have a diesel generator that would only run when being tested and during an emergency. As a result, the impact would be negligible relative to air emissions." (SEA 4.3.2, page 4-4)

Rebuttal #2: This impact statement is purely subjective – merely unverified claims; it needs quantification and proof.

"An air quality applicability analysis prepared in 2008 estimated that the annual emissions for the Museum during its operating lifetime would be approximately 11.5 tons per year (tpy) of NOX and 3.8 tpy of VOCs (Coast Guard, 2008a). This analysis included emissions associated with visitor trips based on an expected 200,000 annual visits by persons in an average group size of two. Although the estimated number of visits to the Museum at the new proposed location on the New London downtown waterfront is higher, these emissions estimates are still reasonable because the Proposed Action alternative has a greater potential for mass transit use, which would reduce total vehicle emissions even with greater museum attendance." (SEA 4.3.2, page 4-4)

Rebuttal #3a: This impact statement is purely subjective – merely unverified claims; it needs quantification and proof.

Rebuttal #3b: What is the statistical error in the 2008 estimation of emissions for 300,000, 400,000 visitors per year.

Rebuttal #3c: Quantify the potential mass transit use.

"Furthermore, the Museum would not result in an increase in GHG emissions directly associated with the Proposed Action alternative in excess of 25,000 metric tons, which is a factor when considering more detailed analysis under draft NEPA guidelines (CEQ, 2010).

Rebuttal #4: What is the source of the 25,000 metric ton – 55,000 lbs?

2. Coastal Resource Impacts

A. *Consistency with Connecticut Coastal Management Act and Coastal Program*

Before the expected FONSI, the CG should submit an application to the Connecticut Department of Energy and Environmental Protection pursuant to Section 307(c)(1) of the federal Coastal Zone Management Act, as amended, Subpart C of 15 Code of Federal Regulations (“CFR”) Part 930 and Section II, Part VII(c) of the Connecticut Coastal Management Program and Final Environmental Impact Statement. The application should request a review of the proposed Museum for consistency with the enforceable policies of Connecticut's federally approved Coastal Management Program as contained in Sections 22a-90 through 22a-112 of the Connecticut General Statutes. The policies in the Coastal Management Act do not exempt any federal facility or use from the federal consistency requirements of Section 307 of the federal Coastal Zone Management Act. The review should determine the following:

- (a) The Museum is a water dependent use.
- (b) The site is suitable or planned for location of a water dependent use.
- (c) The Museum replaces a water dependent use with a non-water dependent use
- (d) There would be an adverse impact on water-dependent Uses and Future Water-dependent Development Opportunities

The Museum is not a water dependent use on a site suitable for such use because it does not require access to the Thames River. This constitutes a significant impact. It is considered a water-enhanced use because its proximity to the River enhances its value as a museum. Only, water dependent uses are permitted under the Connecticut Coastal Management Act and the legislative history establishing the Act and the U.S. Department of Commerce's approval of the Act and Connecticut's Coastal Management Program. As a coastal management policy, the Act requires that the CG, City and state give the “highest priority and preference to water- dependent uses.” And, the Museum cannot be made a water dependent use by merely berthing the Barque Eagle at City Pier or providing public access, which already exists for the parcel. Additionally, sometime in the future Cross Sound Ferry may require additional land for its water-dependent activities and facilities, which, according to the Act, are in the national interest. See **2014 EA, Appendix C** (legislative history on water-dependent uses) and **Appendix D** (Connecticut House of Representatives proceedings on water-dependent uses). And, see [United States Department of Commerce. 1980].

In its letter to Governor Malloy dated January 26, 2012, Cross sound Ferry opposed the downtown location of the Museum adjoining its future potential ferry development and opportunities. See **Appendix 2**.

“To give highest priority and preference to uses and facilities which are dependent upon proximity to the water or the shorelands immediately adjacent to marine and tidal waters.” (CGS, Section 22a-92(a)(3), (b)(1)(A), (b)(1)(C)). The Museum is not dependent on water access, and SEA. As a result locating the Museum as currently planned is **ILLEGAL**.

The SEA does not address sea level rise⁵ and its long term effect(s) on the Museum.

3. Visual Resource Impacts

Claim: “The Proposed Action alternative would result in minor adverse short- and long-term impacts to visual resources within the downtown New London area and potentially along the Groton waterfront.” (SEA, 4.10.2, page 4-24)

Rebuttal: Appropriation of the landscape by the Museum would degrade visual quality unreasonably impair the visual quality of the shoreline through significant alteration of the natural features of vistas and view points, which are in the public domain, and unreasonably restricts physical or visual access to coastal waters. Visual access is a resource, which cannot be unreasonably restricted and which is in the national interest. As a result, the Museum is subject to restriction or exclusion because it can be sited outside the coastal boundary. This, also, constitutes a significant impact.

The proposed modernistic architecture for the Museum defiles, demeans, and denigrates the architecture and character of the railroad station - designed by Henry Hobson Richardson - which is on the National Historic Register - and surrounding buildings as well as the coastal views and vistas on both sides of the Thames River, which reside in the public domain. This is contrary to the Connecticut Coastal Management Act for coastal vistas and viewpoints. The Museum’s design is simply insensitive, garish, grotesque and incompatible with the surrounding architecture when viewed from any angle. It is out of character to the surrounding architecture.

The scenic coastal views and vistas from both sides of the Thames River are considered in the public domain. The railroad station, designed by Henry Hobson Richardson, is on the National Historic Register as well as other buildings including the Superior Court on Huntington Street with a view from Groton. The architectural flavor of surrounding buildings except the city’ parking garage is historic New London dating from Colonial times. The Museum’s architectural features will block or degrade critical views and vistas; its impact will be an abomination of the historic structures contrary to Connecticut’s Coastal Management Act. It is the equivalent of trying to put “two pounds of sausage into a one pound bag.”

“ ‘Adverse impacts on coastal resources’ include but are not limited to: degrading visual quality through significant alteration of the natural features of vistas and view points.” Section 22a-93(15)(F) of the Connecticut General Statutes (“G.S.”).

Visual impact assessment provides a process and standards for objective evaluation – thereby removing much of the subjectivity from the decision-making process and making the results more predictable.

⁵ “Rise in sea level” means the arithmetic mean of the most recent equivalent per decade rise in the surface level of the tidal and coastal waters of the state, as documented in National Oceanic and Atmospheric Administration online or printed publications for said agency's Bridgeport and New London tide gauges. (CGS, Section 22a-93(19))

Landscape impacts are defined as changes in “the character and quality of the landscape as a result of development”. Consequently, a **landscape impact** evaluates:

- Direct impacts from specific landscape elements;
- More subtle, or indirect, effects on the overall pattern of elements that shapes landscape character; and
- Impacts on generally accepted special interests or values such as designated landscapes or scenic views, conservation areas, public lands, and historic and cultural sites.

4. Energy Resource Impacts

The CG is obligated to consider energy as a Chapter 3.0 Affected Resource with Chapter 4.0 Environmental Impacts from construction of the Museum.

Executive Order 13514⁶ is an order entitled *Federal Leadership in Environmental, Energy, and Economic Performance* that President Barack Obama signed into law on October 5, 2009.

This executive order mandates that at least 15 percent of existing federal buildings and leases meet Energy Efficiency Guiding Principles by 2015, and that annual progress be made toward 100 percent conformance of all federal buildings, with a goal of 100% of all new federal buildings achieving zero-net-energy by 2030. The U.S. government is the largest consumer of energy in America. It has roughly 500,000 buildings, and most of these buildings are energy-inefficient.

The executive order states that "the Federal Government must lead by example ... increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities ... design, construct, maintain, and operate high performance sustainable buildings in sustainable locations; strengthen the vitality and livability of the communities in which Federal facilities are located; and inform Federal employees about and involve them in the achievement of these goals."

"Zero-net-energy building" is defined in Executive Order 13514 as "a building that is designed, constructed, and operated to require a greatly reduced quantity of energy to operate, meet the balance of energy needs from sources of energy that do not produce greenhouse gases, and therefore result in no net emissions of greenhouse gases and be economically viable". **This edict is best accomplished by a Virtual Museum.**

Title 40 CFR 1502.16(e) (Environmental consequences) requires discussion of “Energy requirements and conservation potential of various alternatives and mitigation measures.” Additionally, the section entitled “Energy Supply and Natural Resources Development” in COMDTINST M16475.1D, Enclosure (1), Attachment 2, page 11, subdivision 10 requires EIS

⁶ Exec. Or. 13514, 74 Fed. Reg. 52117 (October 8, 2009)

to consider “whether the project or program will have any effect on either the production or consumption of energy and other natural resources, and discuss such effects if they are significant.” Even though, the scoping is for an SEA, not an EIS, the assessment should analytically address energy consumption and GHG production consistent with the purposes of NEPA and Executive Orders on the subject.

Parallel to NEPA is the Connecticut Environmental Policy Act (“CEPA”) found in section 22a-1b, G.S. Subsection (c) requires scoping for an EA, and subdivision (7) requires “the effect of the proposed action on the use and conservation of energy resources,” which may significantly affect the environment.

The legislative findings and purpose for energy planning in Connecticut is found in section 16a-1, G.S.,⁷ and legislative findings and policy for energy utilization and policy is found in section 16a-35k, G.S.⁸

Since energy consumption and GHG production are quantifiable terms, the SEA should contain analysis of the energy consumption over the projected life of the Museum for the design, planning, extraction of raw materials; transportation, manufacture, assembly, installation, construction, operation, maintenance, repairs and ultimate disposal by either demolition, deconstruction, rehabilitation, etc. of each alternative to evaluate the option requiring the least consumption and producing the least amount of gases.

Energy consumption is the direct cause effectuating pollution, impairment or destruction of the air, water or other natural resources. There are a number of reasons for this:

⁷ It is found and declared that a shortage of energy supplies and resources exists in the state and the United States and that a critical shortage may be imminent, that the existence of such shortage is inimical to the public health, safety and welfare of the people of the state, that there is a necessity to implement the federal mandatory allocation order and other federal directives and federal statutes, establish contingency rationing plans for fuel oil, gasoline and other energy supplies and restrict the use of energy and that the necessity of enacting the provisions of this chapter to provide for equitable distribution and conservation of energy is declared as a matter of legislative determination.

⁸ The General Assembly finds that the state of Connecticut is severely disadvantaged by its lack of primary energy resources; that primarily as a result of past policies and tendencies, the state has become dependent upon petroleum as an energy source; that national energy policies do not preclude the recurrence of serious problems arising from this dependence during petroleum shortages; that the increase in oil prices since the 1973 oil embargo has had a major impact on the state; that the economy has suffered directly because of our dependence on petroleum and constraints upon the rate of conversion to alternatives; that other conventional sources of energy are subject to constraints involving supply, transportation, cost and environmental, health and safety considerations; and that the state must address these problems by conserving energy, increasing the efficiency of energy utilization and developing renewable energy sources. The General Assembly further finds that energy use has a profound impact on the society, economy and environment of the state, particularly in its impact on low and moderate-income households and interrelationship with population growth, high density urbanization, industrial well-being, resource utilization, technological development and social advancement, and that energy is critically important to the overall welfare and development of our society. Therefore, the General Assembly declares that it is the policy of the state of Connecticut to (1) conserve energy resources by avoiding unnecessary and wasteful consumption; (2) consume energy resources in the most efficient manner feasible. . . . The General Assembly declares that the energy policy is essential to the preservation and enhancement of the health, safety and general welfare of the people of the state and that its implementation therefore constitutes a significant and valid public purpose for all state actions.

First, although we are used to thinking in terms of monetary costs, each dollar of cost requires the consumption of energy for meaning to that dollar. For the nation as a whole, the cost is roughly about 7 mega joules (i.e., 240,000 calories) consumed per dollar of development spent — ratio of the energy use of a country by the GDP for the same year— roughly half a liter of oil or its equivalent as some other fuel. [Murphy and Hall, 2011]. Certain activities, such as construction, tend to be more energy intensive per unit dollar spent. Very careful assessments of these energy costs were made in the 1970s and are still useful when corrected for inflation. Spending large amounts of money requires spending large quantities of energy for that money to have meaning. Therefore, for a \$100 million museum, the Association will require approximately **100 trillion joules of energy** to develop the facility excluding the energy to operate, maintain and repair.

Second, any time energy is used there are environmental effects and consequences. These range from impacts at the extraction sites (e.g. oil facilities in Southern Louisiana, Alaska and Venezuela and coal mines in Wyoming or Pennsylvania) to processing, and fabrication facilities, transportation and consumption sites (e.g. cement, steel or bulldozer factories). For example, these impacts include terrain disruption, air pollution (e.g. sulfur dioxide emissions), water supply contaminations, and so forth.

Third, the impacts are essentially irrevocable changes to our atmosphere with possible severe climatic impacts. There is roughly one kilogram of CO₂ released per dollar of economic activity in the U.S. Thus, each unit of economic activity generates very long term disruption to our atmosphere since that carbon dioxide will stay in the atmosphere for an average of hundreds of years.

Fourth, the principal source of our energy use is fossil fuel, by definition non renewable. Our domestic petroleum and gas supplies are quite finite. For example, U.S. production of oil peaked in 1970 (as predicted by King Hubbert in 1955). It has been declining steadily since then despite huge drilling investments, so that we now produce roughly half of what we did in the 70's. The difference comes from imported oil, which now represents approximately 60 percent of the Nation's supply. It is not clear when the total world oil production will peak, but it will be in 2007 (predicted by King Hubbert in 1968 and by Colin Campbell in 1998). It is hard to find a prediction made by any competent researcher that pushes the peak beyond about 2030 assuming continued economic growth, and most suggest sooner. Natural gas supplies are harder to predict but might not be too different from oil. Amongst the world authorities on these estimates are Cutler Cleveland and Robert Kaufmann, Director and Associate Professor of the Boston University Center for Energy and the Environment, who acknowledged the difficulty in validating the data from the major oil producing regions of the Middle East. See, also, [Rickover, 1957].

Thus, it is important to understand that there are many scientific, environmental, economic and political reasons for minimizing energy usage and waste, over the foreseeable time. There is a substantial probability of excessiveness, unreasonableness and capricious environmental harm unless the NEPA process includes a rational methodology for determining the preferred option contributing to the least predictive injury. Resource planning using

analyzes, studies, assessments and evaluations afford a community the predictive opportunity to contemplate options preventing irretrievable and irreversible commitments of resources and environmental abuse. Historical resource planning has primarily concerned corrective considerations.

Life-cycle studies can be used as a means to identify and select the most efficient alternatives in order to reduce consumption of resources and lower the environmental impact in existing electricity generation and distribution systems. Comparative energy consumption assessments for the expected life of alternatives (i.e., a/k/a life-cycle energy consumption or embodied or accumulated energy consumption) provide the best scientific basis to use resource planning for selecting the preferred alternative. Without energy computations for the estimated life of buildings and structures, the NEPA process becomes quite irrational, unscientific and arbitrary. In my opinion, the CG runs the significant risk of unplanned, but preventable, pollution, impairment or destruction of natural resources. Embodied (accumulated) energy is the total quantity of energy required to manufacture, and supply to the point of use, a product, material or service and disposal. It includes the energy expended from cradle to grave for: extracting raw materials; transporting, manufacturing, assembling and installing a specific material to produce a service or product and finally its disassembly, deconstruction and/or decomposition.

When evaluating the Museum, the CG should perform and provide a life cycle energy analysis for the overpass — integral to the Museum — and each of the Museum options for the purpose of selecting the alternative requiring the least energy expenditure and producing the least GHGs. Such analysis should include calculations of all embodied energy requirements used in construction materials, fabrication and manufacturing of components, maintenance and repair of the facility and ancillary work during its useful life, viz. cradle-to-grave. The analysis should, also, include the total fuel cycle energy required over the projected useful life of the facility. The boundary for both the energy calculations of the fuel cycle and materials for the facility construction and maintenance shall both be at the point of primary material extraction and include the energy consumed through the entire supply chain to final, but not be limited to, such subsequent steps as transportation, refinement and energy for delivery to the end consumer. For purposes of this paragraph, "facility energy" means the heat energy delivered by the facility contained in a fuel minus the life cycle energy used to produce the facility. "Fuel energy" means the heat energy contained in a fuel minus the energy used to extract the fuel from the environment, refine it to a socially useful state and deliver it to consumers, and "embodied energy" means the total energy used to build and maintain a process, expressed in calorie equivalents of one type of energy.

Life cycle assessment means the comprehensive examination of a product's environmental and economic aspects and potential impacts throughout its lifetime, including raw material extraction, transportation, manufacturing, use, and disposal.”

For example, consider the life cycle steps requiring energy at each step to produce a simple pencil.⁹

Executive Order

In his Executive Order, the President declared that the goals for all federal agencies are “[t]o establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions a priority for Federal agencies. . . .” In Section 2(f)(iv) of E.O. 13514, the President declared that it is the goal of all federal agencies to advance regional and local integrated planning by:

“identifying and analyzing impacts from energy usage and alternative energy sources in all Environmental Impact Statements and **Environmental Assessments** for proposals for new or expanded Federal facilities under the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 *et seq.*)” (Emphasis added.)

⁹ The standard pencil begins when a cedar is cut down. Ropes and gear tug it onto the bed of a truck or a rail car.

Think of all the numberless people and skills involved in mining ore to produce steel and refine the steel into saws, axes and motors.

Think of all the people who grow hemp, then transform it, through various stages, into a strong rope.

Think of the untold thousands of people who produce the coffee the loggers drink!

The logs are shipped to a mill and cut into slats. The slats are kiln-dried, tinted, waxed, then, kiln-dried again.

How many skills were needed to produce the tint and the kilns. What about electric power? What about the belts, motors and other parts at the mill?

The pencil slats are shipped to a factory. A complex machine cuts grooves into each. A second machine lays lead into every other slat. Glue is applied. Two slats are sealed together as one, then, cut into lengths that form pencils.

The lead alone is complex; it's not really lead. To produce it, graphite is mined in Ceylon. The graphite is, packed and shipped, then mixed with clay from Mississippi. It is treated with wetting 'agents — such as sulfonated tallow, which is formed when animal fats chemically react with sulfuric acid.

The pencil receives six coats of lacquer. Lacquer has numerous ingredients, including castor oil. Think of all the chemists needed to create the paint — think of all the castor bean growers needed to produce, refine and ship the oil.

The brass end that holds the eraser in place is a marvel. Miners need to first extract zinc and copper from the earth. Experts transform those materials into sheet brass, which is then cut, stamped and affixed to the pencil.

That brings us to the eraser. It is made from "factice," a rubber-like product that is produced by rapeseed oil from the Dutch East Indies reacting with sulfur chloride.

To be sure, an awe-inspiring amount of work goes into producing a pencil. Millions of people collaborate to produce it — millions ply their unique trades and skills — yet they have no idea they are collaborating.

Each is merely changing his small piece of know-how for the money he needs to buy the goods and services he wants.

More amazing is this: No one person is capable of making a pencil. Not even the president of the pencil company.

No one person could possibly manage the millions of people — and the millions of decisions they make — who produce the ingredients that become a pencil.

Despite the absence of a mastermind, billions of pencils are made every year. They're produced with such humdrum efficiency that every one of us takes pencils for granted. It is a folly for any, man, or group of men, to think of producing something as incredibly complex as a pencil. How much harder must it be to produce a car — one that consumers will want to buy, anyhow?

The CG needs to provide analysis of average distance traveled and energy consumed for the traveling public to the Museum from various places of departure around the country.” The Association projects about 800,000 visitors per year while the 2006 EA projected only 200,000.

The NEPA and CMDTINST require the EA to look beyond the immediate site and building and to examine the entire life cycle of energy consumption and production of GHGs. A building cannot truly be called sustainable if its whole life cycle lacks sustainability. The owner of a building does not live up to modern environmental codes of conduct without optimizing environmental protection in the whole chain upstream and downstream. Life-cycle studies contribute to a good platform for dialogue where different set of values and interests can be made clear.

5. Strategic Sustainability Performance Plan

Section 8 of E.O. 13514 requires that “each agency . . . develop, implement, and annually update an integrated Strategic Sustainability Performance Plan that will prioritize agency actions based on lifecycle return on investment. . . .” Each such Plan and update is subject to approval by the Office of Management and Budget Director under section 4 of the order with respect to the period beginning in fiscal year 2011 and continuing through the end of fiscal year 2021.

The SEA should address this Plan in the consideration of alternatives for energy sustainability as an environmental factor. The CG should provide the Plan prior to commencing the EA.

6. Earthquake Impacts

The SEA needs to assess the potential for damage from earthquakes to the Museum. While the possibility of an earthquake seems remote in the New England region, it has the same vulnerability according to the Connecticut Department of Emergency Management and Homeland Security, Earthquakes, The DEMHS Advisor, Volume 3, issue 6, April 2007:

“The eastern half of the United States does not have as high a frequency of earthquakes as California and Japan, but this part of New England has had many history making tremors. The first recorded event in the New World was related to traders by the Native Americans already here. They said it happened in the vicinity of Moodus, CT, in 1568”;

“All that survives of the story is a tale of mass destruction of campsites and violent vertical shaking motion of the ground. Sermons are recorded from a service held in the town of Hampton, New Hampshire on October 29, 1727. They speak of the "terrible day of trouble" that happened the day before as a severe quake sounding like "thunder and lightening" rocked the village. The event created fissures in earth and buildings still visible today”;

“New England has the oldest record of earthquakes in the United States. The earliest settlers learned of seismic activity in this area, dating back to 1568, from the native Indians. This probably happened in the Moodus area. This area is still very active today. Almost 50% of all seismic activity in Connecticut since 1729 has occurred in the Moodus region. Tremors have been felt across the state for a long time”;

“Connecticut is considered to be a Moderate seismic risk zone as defined by the Federal Emergency Management Agency. However, ‘Moderate’ relates to the fact that earthquakes in the state have a relatively long reoccurrence interval and not that the earthquake magnitudes or impact on the population will necessarily be moderate”;

“Connecticut has a population density that is 3.5 times greater than California's and has a hard base rock that transmits seismic waves over a large area much more efficiently. These facts place more people at greater risk since the built environment in this region is predominantly old, unreinforced masonry or is not seismically designed. The majority of these "mill" structures are amazingly strong and stiff for the normal vertical loads they were built to carry. In spite of this, brick is brittle material. Masonry walls will not fare well against the horizontal forces of an earthquake if it is not reinforced or braced in some way” and

“The chances that a damaging earthquake of magnitude 5.0 or greater will occur within the state in any one year are 1 in 20. The odds of an earthquake of magnitude 6.0 here are about 1 in 300 annually. By the year 2010, the accumulated probability for a magnitude 6.0 earthquake will have reached 85%. The Connecticut Earthquake Program is charged with the mission of earthquake risk management, i.e. reducing fatalities, injuries, and property damage resulting from an earthquake in Connecticut.”

7. Solid Waste Impacts

Claim: “Provide for waste management procedures and practices to prevent or reduce the discharge of pollutants. For solid or construction waste, this includes designated trash and bulk waste collection areas, recycling and segregation of materials whenever possible, proper segregation and disposal of hazardous material wastes, and daily cleanup of litter and debris. For sanitary and septic waste, this includes convenient and well-maintained toilet facilities.” (SEA, 2.3.9, page 2-27) “Solid Waste Disposal – Solid waste disposal is currently provided under a private contract.” (SEA, 3.13.1, page 3-31) “Solid Waste Disposal – Solid waste disposal is not currently provided to the project site; however, it is expected to be provided under a private contract.” (SEA, 3.13.2, page 3-31) “Solid Waste Disposal – The City of New London provides solid waste collection and operates a Solid Waste and Recycling Center at 63 Lewis Street. Solid waste generation at the museum is anticipated to be largely affiliated with waste receptacles,

restroom facilities, and food-related waste from vending and event waste.” (SEA, 4.13.2, page 4-35)

Rebuttal: Quantify the amount of waste to be generated for pre-and post construction and annually.

8. Feasible and Prudent Alternatives

No Build Alternative: The Virtual Museum.

“This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall: (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” 40 CFR 1502.14 (a) (Alternatives including the proposed action).

The feasible and prudent alternative of creating, operating and maintaining a Virtual CG Museum and television channel at the Academy over the Internet similar to the United State Naval Academy Museum and other museums on the world wide web to display the Academy’s and Forrestville artifacts. A Google search for “virtual museums” revealed 317,000 +results; this clearly demonstrates the global trend towards Internet museums in 3-dimensional holographic imagery displayed to the entire world thereby eliminating the need for energy waste from transportation and buildings. Elaborating further on a CG Virtual Museum, the U.S. Air Force Museum at Wright-Patterson Air Force Base displays all its artifacts on the Internet. The Maritime Museum at Norfolk, Virginia displays its artifacts on the Internet and the Mystic Seaport Museum, Mystic, Connecticut displays its artifacts on the Internet. The benefits are obvious and the current virtual museums attract and will potentially attract far more corporate sponsors than fund raising for an excessively costly and anachronistic Museum more suitable to bygone eras — energy is no longer cheap and plentiful.

It’s time for the CG, operating with limited budgets, to develop its **Museum of the 21st Century for the World** instead of, not in addition to, physical structures. Perhaps, the CG’s leadership can reinvent its obsession to look forward and think outside-of-the-box. A helicopter whose windows will be outfitted with virtual-reality screens will recreate storm conditions under which the CG rescues imperiled boaters. The CG can show the same reality by selling helicopter simulation games or presenting it on the Internet without the need for a building. Such museum would include cable television and satellite stations for displaying and interpreting the artifacts; and

9. Social Impacts

Is the Coast Guard, the guardian of the coast, really going to build their museum in a storm-prone flood plain with difficult access for the handicapped? The SEA should analyze the social impacts from the perspective of a handicapped person trying to wrestle with the idea of finding a parking space in a congested area, and negotiating a bridge/elevator complex to gain access.

10. Mitigation

“This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall: (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.” 40 CFR Sec. 1502.14(f) (Alternatives including the proposed action).

V. CONCLUSION

No design, siting and construction details are needed to determine whether the Museum is a water dependent use according to the CCMA and its legislative history, which is a limiting factor for the downtown land acquisition. Similarly, no design, siting and construction details are needed to consider vista impacts, and energy consumption and GHG production in light of the Virtual Museum alternative and television channel, which would require no engineering, site development, construction, maintenance, and energy analysis for heating/ventilation/air conditioning.

The Museum is enclosed in glass, which is not an insulating material. Simple heat transfer calculations would predict the heat, ventilation and cooling loads during the different seasons.

Furthermore, according to the legislative history of CCMA, the Museum is unquestionably not a water-dependent use, but, rather, a water-enhanced use barred by CCMA, which gives highest priority and preference for water dependent uses.

The Fort Trumbull location, which the CG selected in 2008, has the same environmental consequences as the downtown location except for the water dependency issue. The Fort is unsuitable for water dependent uses because of the Riverwalk, which prohibits access to the Thames River.



Robert Fromer

REFERENCES

1. Rickover, Rear Admiral H., 1957. *Energy resources and our future*. Rear Admiral Hyman G. Rickover, USN, Chief, Naval Reactors Branch, Division of Reactor Development, U.S. Atomic Energy Commission and Assistant Chief of the Bureau of Ships for Nuclear Propulsion, Navy Department. Remarks delivered at a Banquet of the Annual Scientific Assembly of the Minnesota State Medical Association, St. Paul, Minnesota, May 14, 1957. (Available on the Internet).

2. State of *Connecticut Coastal Management Program and Final Environmental Impact Statement*. United States Department of Commerce, National Oceanic and Atmospheric Administration, Office of Coastal Zone Management, 1980, 550 pp. (Available on the Internet by the title.)

APPENDIX 1

Cartoon



Published August 04. 2018 4:48PM| Updated August 05. 2018 8:49AM

APPENDIX 2

Cross Sound Ferry Letter



Linking Long Island and New England for over 35 Years

January 26, 2012

Hon. Dannel P. Malloy
Governor
State of Connecticut
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Dear Gov. Malloy:

The Director of the National Coast Guard Museum Association, Catherine Cook, recently came to Cross Sound Ferry to present a new alternative plan for the National Coast Guard Museum. The proposal includes an expanded Union Station connected, via a pedestrian bridge over the railroad tracks, to a large annex building that begins on City-owned property and juts out onto the Thames River. While we are in favor of a USCG expansion and for a museum in New London, we are adamantly opposed to the current proposed location for the museum.

The plan eliminates our use of land we currently lease from the City that has been used to support waterborne transportation and interstate commerce for decades, obstructs our emergency right of way, infringes on our riparian water rights, and interferes with the safe navigation of our vessels. Furthermore, it obliterates our own plan for an expanded high-speed ferry service, which has been on public record with the City for years. We believe, as we know you do, that waterborne transportation and shipbuilding and repair should be the primary purpose of New London's deep water port.

Cross Sound Ferry is recognized by the USCG as one of 12 High Capacity Vessel Owners/Operators in the U.S. As a large-scale operator, we are constantly in need of more space. The 1.5 million people and 500,000 vehicles we move annually already tax our limited parcel.

The land we do own was hard earned through various purchases over the past 35 years by members of three generations of my family. In fact, one such purchase granted us the riparian rights over the water onto which the plans call for the museum to be built. We have also leased the piece of property proposed for the museum annex building for over 20 years and have attempted to purchase it outright from the City on two separate occasions. While it may not be a large parcel, it is the last piece of commercial waterfront property available for any future growth of our ferry services.

2 Ferry Street, New London, CT 06320

Phone (860) 443-7394

Fax (860) 440-3492

www.longislandferry.com

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Gov. Dannel P. Malloy
January 26, 2012
Page 2

Prior to the downturn in the economy, Cross Sound had proposed a new high-speed/passenger-only ferry terminal with public observation deck along with two fixed piers for the docking of up to four vessels using that property. We currently have high-speed ferry operations to Orient Point, Long Island, Block Island and Montauk from New London. Previous and future destinations include Martha's Vineyard and New York.

In March 2010, ConnDOT released a transportation plan to address the current and future needs at the New London Transportation Center. Among the recommendations were increased accommodations for bus, rail and ferry services to meet the growing demand for transit. Identified in the plan was the need for an overhead pedestrian way to seamlessly connect the 1000 car Water Street parking garage, a new bus terminal, the railroad station and ultimately connect to Cross Sound's ferry terminal facilities.

The State appropriated \$750,000 for the plan that was spearheaded by the Chamber of Commerce of Eastern Connecticut and overseen by the region's COG to address concerns that New London needed to be prepared for an increase in commuter rail service, ferry and bus service and to be able to meet future parking demands. The plan identified the parcel of land in question as part of the region's transportation hub. The proposed museum project stymies any growth opportunities for transportation at that site forever.

Using that piece of land for anything other than transportation not only puts an end to any future expansion of the waterborne component of the Transportation Center but also completely divides the center as it is currently situated. The proposed structure has the serious potential to harm existing ferry operations by obstructing navigation, access to and from the ferry terminals along with blocking the line of sight down the river for departing and returning ferries. There is also an issue with riparian rights along that piece of property.

We want you to know that we value the USCG as a partner and a neighbor in New London. We feel strongly that having the Academy in New London is nothing but a boon for the City and a USCG museum in New London will be a cornerstone attraction for the entire region. However, we cannot support this particular concept as it has been proposed. While there are other suitable and attractive locations for a national USCG museum in New London, the ferry services need to operate and grow at their current location, while enjoying synergies with connecting rail, bus, parking and other transportation amenities.¹

While it appears this concept plan has been circulated for months, we were only made aware of these plans last Friday. We feel the State's and particularly Southeastern Connecticut's transportation needs were not duly considered while this concept plan was being developed. Before proceeding any further with these plans, the future needs of transportation in New London and the region need to be addressed.

¹The New London Transportation Center is one of the only locations in the U.S. where high-speed trains are directly linked with high-speed ferries to multiple destinations. Amtrak Acela Express connects with up to 10 high-speed ferry departures daily during peak periods.

Gov. Dannel P. Malloy
January 26, 2012
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Gov. Malloy, we have sent along our concerns in a separate letter to Admiral Papp. We appreciate your input in this important issue and I await the opportunity to answer any questions.

Sincerely,



John P. Wronowski
Owner/President

Cc: Hon. Andrea Stillman
Hon. Andrew Maynard
Hon. Ernest Hewett
Hon. Ted Moukawsher
Hon. Elissa Wright
Hon. Tom Reynolds
Jay B. Levin
Mark H. Powers
Mark Brennan

From: Nancy Hennegan
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum
Date: Wednesday, August 29, 2018 11:38:08 AM

Jeanine Gouin,

Regarding the museum, the plan is to build it in a flood zone. This is ENVIRONMENTALLY wrong. The \$100 million dollar estimate does not take into account the future cost increases. The museum belongs at Fort Trumbull and the claim that the Eagle draws too much water for a dock space at the Fort is false. I hope we don't find LNG tankers at the Fort in the future. I imagine they draw at least as much water as the Eagle.

Nancy Hennegan

From: WILLIAM ANTONOWICZ
To: [Jeanine Gouin](#)
Subject: USCG Museum
Date: Thursday, August 30, 2018 3:36:23 PM

Dear Ms. Gouin,

I would like to make a few comments on the proposed location of the new Coast Guard Museum.

As a retired Coast Guardsman, I think the proposed location, in a high traffic limited parking area of downtown New London, is not a good idea for the following reasons.

1. It is proposed to be built in a flood plain area, with some of the proposed area still under water! I can visualize notices closing the museum due to potential flooding.
2. The access across the railroad tracks using an expensive bridge/elevator complex will be sure to cast doubts in the mind of anyone who is handicapped. Some people may attempt to defeat the bridge/elevator, putting them at risk in crossing the tracks, an unsafe condition.
3. There is no assurance there will be enough parking space in the garage available to those wishing to visit the museum.
4. The proposed location of the ultra modern proposed building is in an area of historic buildings, and will partially block the view of the pretty New London waterfront and the Thames River.
5. Except for those people making the location decision, and based on reviewing comments to the New London Day and also from people I know, most people don't like the proposed location of the museum. I would think the slow trickle of donations would tend to confirm this.

AS a suggestion, why not locate the museum in the historic Fort Trumbull area, the former home of the Coast Guard Academy? Due to a failed New London project, there is plenty of accessible space.

- + The land is all relatively flat, and the potential flooding would be minimized.
- + There would be no \$20 million bridge/elevator complex required or a repairman with a toolbox, as patrons (handicapped and otherwise) could drive right up to the front door.
- + Since most of the land in the Fort Trumbull area has been cleared, parking and accessibility would not be a problem. No train tracks to walk across.
- + The Fort Trumbull area location would not create any conflict with any historical buildings, and would also enable the extra space if needed to present some older historical Coast Guard vessels in front, and immediate attraction and attention getter.
- + Based on the comments I have heard, I believe most people would be more approving of the Fort Trumbull area, which has the space to accomodate the museum grounds.

+ As another comment, I would like to see the former New London landmark, Hughies Restaurant, be re-established near the museum. Hughie was a former boxer from New London, and I visited the restaurant many times when attached to Coast Guard

Station New London. Hughies family still operates a restaurant in New London,

The addition of the Coast Guard Barque Eagle, when available, and the former slave ship Amistad, would add to the attractions. Thinking a little further, a motorized shuttle from Fort Trumbull would provide access to the downtown area restaurants and shops, and also to the Eagle downtown, and the Amistad.

Respectfully submitted,

William R. Antonowicz
28 Peachtree Hill Ave.
Ledyard, CT 06339
USN/USCG (ret)

From: Lloyd Hutchins
To: [Jeanine Gouin](#)
Subject: Supplemental Environmental Assessment for Public Comment re Proposed USCG Museum-New London
Date: Thursday, August 30, 2018 11:25:57 AM

The proposed location behind the New London train station is far inferior to a location close to the USCG's original home at Ft. Trumbull. The latter will provide room for expansion, parking and less risk of flooding from rising seas and storms. It will also not require a \$10M+ pedestrian bridge. Think of an inspired design, like the Sydney Opera House, commanding the hill at Ft. Trumbull—people will come to see that. Include a band shell for the USCG Band.

Also, the artist conception does not reflect current Amtrak reality: it shows a third railroad track between the passenger platform for north-bound trains and the museum. There is no catenary of power lines above this third set of tracks, so these are diesel powered trains? In any event, that third set of tracks is too close to the building. Has Amtrak reviewed your plans for track right-of-way, building set-back, safety, access, etc? Have you considered the vibration impact of express trains on the museum?

Semper Paratus!

August 30, 2018

United States Coast Guard
c/o Milone & MacBroom Inc.
Attn.: Jeanine Gouin
99 Realty Drive
Cheshire, CT 06410
jgouin@mminc.com

Re: Supplemental Environmental Assessment (SEA) related to the planned construction of the National Coast Guard Museum

Dear Jeanine Gouin et al.,

The proposed building location of the National Coast Guard Museum would significantly damage the historic views of downtown New London from the water. Thousands of people arrive in New London by boat and are impressed by the progression of the waterfront from the lighthouses, passed Fort Trumbull, to the H. H. Richardson designed Union Station. We cannot afford to compromise the city's rich history by blocking it from view. Furthermore, with the increased likelihood of storm damage from climate change, building on top of an already overdeveloped and ageing waterfront would make New London even more vulnerable.

We urge you to reconsider the location of the museum. Fort Trumbull (Shaw Neck) seems to be the ideal location. Years ago the site was selected for development and abandoned. The proximity to Fort Trumbull State Park and Museum, the US Coast Guard Station, and the Coast Guard Research & Development Center could be incorporated into a museum campus with ample space for leisure, recreation, auxiliary services, parking, and future expansion. The public pathways and beautiful vistas around Fort Trumbull were clearly intended to connect to downtown New London via the Waterfront Park. Siting the new Coast Guard Museum at Fort Trumbull would be the perfect opportunity to realize this connection.

Access to the museum could be a short walk or bike ride from downtown. The funds from the State of Connecticut for a pedestrian bridge over the train tracks at Union Station could be reallocated to build this critical and overdue linkage at Shaw's Cove. Visitors will be able to take advantage of the new bike share program to quickly travel along the scenic waterfront between downtown and the museum. And of course, the Thames River Heritage Park Water Taxi provides another connection to downtown and to Groton's Fort Griswold Battlefield State Park.

Finally, at the Fort Trumbull site, there are numerous opportunities for ecological landscaping to increase coastal resiliency in an attractive and striking way, highlighting New London's growing reputation as a Sustainable CT leader. Visibility of the new museum and campus from train and ferry would serve as an inviting showcase for New London, making the National Coast Guard Museum and our historic seaport city a world class destination.

Sincerely,
Andrew Lopez | alopez6@conncoll.edu
& Maggie Redfern | mredfern@conncoll.edu

CC: Mayor Michael Passero <mpassero@ci.New-London.CT.US>
Laura Natusch, Executive Director of New London Landmarks <lnatusch@yahoo.com>

From: Timothy Pratt
To: [Jeanine Gouin](#)
Subject: Coast Guard Museum Public Comment
Date: Thursday, August 30, 2018 2:35:52 PM

To: United States Coast Guard
c/o Milone & MacBroom Inc.
Attn: Jeanine Gouin
From: Timothy Pratt
1288 River Rd
Mystic, CT 06355
Re: Proposed Coast Guard Museum Location

I wish to state my disagreement with the NCGMA's plan to construct a Coast Guard Museum on waterfront land adjacent to Union Station in downtown New London. I believe that locating the proposed museum in the Fort Trumbull State Park area is a far more logical choice.

Locating the museum downtown will seriously detract from the visual landscape of that area by overshadowing the historically important Union Station, obstructing views of the Thames River, and contributing to traffic congestion. It relies on the concept of the "pedestrian walkway," an expensive urban planning gimmick that is notorious for working better in theory than in practice.

The Fort Trumbull site, with a rich heritage of its own, has sweeping views of the Thames River and New London Harbor, Ledge Light, Groton Heights, and Fisher's Island Sound, all of which are strongly connected to the Coast Guard and its history. Visitors will have a greater sense of the vast maritime and shoreline environment in which the Coast Guard operates. The larger site allows for more flexibility in the design of the building, and, being at a higher elevation and further from the water's edge, will not be subject to the same engineering challenges and restrictions in this era of global warming and rising sea levels.

The process by which the downtown site was chosen was flawed and, apparently to me, driven by a misguided determination to be near the train station and ferry terminals, with the idea of diverting travelers using those facilities into visiting the museum. However, I believe most visitors to the museum will be coming on purpose, and by automobile, not train, bus, or ferry. For them driving to Fort Trumbull would be virtually the same as driving to the train station area. For those who do choose to visit by train or ferry, shuttles and water taxis to the museum would be an interesting, and even enjoyable, option. Ultimately, as the Fort Trumbull area is rebuilt, the new museum could become the centerpiece of an active residential and commercial district.

The Fort Trumbull site provides a setting with numerous advantages. I strongly urge the NCGMA to reconsider the proposed downtown location and to look to the future both from an environmental perspective, and in terms of how the museum can expand to tell the Coast Guard's story in the years to come.

Thank you for the opportunity to provide comment on this matter of great importance to the Coast Guard and our region.

From: nstrohla@gmail.com
To: [Jeanine Gouin](#)
Subject: re/proposed Coast Guard museum
Date: Thursday, August 30, 2018 9:04:26 AM

To Whom it may concern regarding the proposed Coast Guard Museum :

I totally **reject** the placement of the proposed Coast Guard Museum .

- As a former member of the Old Lyme planning and zoning commission, I can't believe that there are not some regulations that prevent its proposed placement.
- If nothing else it is WAY too close to the water and possible storm surges . Aren't we all preparing for the Oceans to rise due to global warming !
- Why destroy the waterfront now that is one of the main attractions of New London .
- Put the museum out on the Fort Trumbull property . Draw the folks that come to New London a little away from downtown . Think of the possibility of businesses that will grow from this short move ; more restaurants, a tour bus, the present water taxi .

Everything will not be crammed into one little area.

Nancy C. Strohla
18 Landing Rd.
Old Lyme, CT 06371

From: David Arnold
To: [Jeanine Gouin](#)
Subject: Comments regarding CG Museum proposed for downtown New London
Date: Friday, August 31, 2018 6:28:40 PM

I am a retired Coast Guard Officer. I have attended "informational" events concerning the proposal and followed the history of proposals of the past for another CG museum in addition to the existing museum at the CG Academy that had been moved and significantly expanded there since my graduation there in 1964. I have since then resided in the city of New London and nearby towns for a total of over 44 years.

I consider it a futile effort to submit this comment having seen how common sense, laws and regulations and obvious facts in the ongoing discussions of various plans and designs have been ignored by representatives and contractors who have been hired to sell the plan to the public and gain financial support for it. So many times the only answer to significant questions and common sense criticisms given by representatives is that the plan is a "done deal".

I am aware of past claims and plans made by the Coast Guard Foundation which have been shown to be scams serving the ultimate interests of corporations and their leaders which the Coast Guard is charged to regulate. There is reason to believe that this may be another of such schemes given the irrationality of supportive justifications for the "done deal".

In attempting to understand the history of this project one may speculatively conclude that what the plan for the construction adjacent to the RR station is really all about is to keep Fort Trumbull available for a deep water shipping port and tank terminal to divert risk and expense of expanding such activity in major cities of Boston or New York/New Jersey, thus decreasing the costs of the project and risks to major cities while increasing profits to such corporations as MateX Tank and Terminal and McQuarry International and increasing risks to residents in the vicinity of New London. It should be noted that the head of the grand plan that has been proposed is the owner of the RR station, has management influence and significant ownership in Matex and McQuarry International. These are major corporations in the business of operating tank terminals.

There have been many revelations of recent corruption of high level public officials who serve themselves and not the interest of the public. This may be another example. There have been in the local paper and meetings many questions and objections raised to this project for very good reasons by informed, knowledgeable, and concerned citizens. These voices have been ignored. This whole project has a terrible odor to it. If it is a "done deal" "in the public interest" and done despite public objections, those who are responsible and profit from it should bear the responsibility and costs of the consequences. It seems that the public comment is not considered at all, even though it is these citizens who may ultimately pay the costs.

David Arnold

To: Jeanine Gouin, c/o Milone and MacBroom
99 Realty Drive, Cheshire, Connecticut 06410

From: Linda Brunza- Environmental Analyst

Telephone: 860-424-3739

Date: 9/4/2018

Email: Linda.Brunza@ct.gov

Subject: United States Coast Guard, Supplemental Environmental Assessment, National Coast Guard Museum, New London CT

Thank you for the opportunity to offer comments on the Supplemental Environmental Assessment (SEA) dated July 2018 for the National Coast Guard Museum in New London, Connecticut. The SEA was prepared to evaluate specific impacts related to the construction and operation of the National Coast Guard Museum. Construction and operation activities include the acquisition of adjacent land, shoreline modifications, museum layout, design and site improvements. The Department of Energy and Environmental Protection (DEEP) offers the following comments for your consideration.

Flood Management Certification

Section 2.3.13 of the document discusses that a pedestrian overpass will be constructed from the Water Street parking garage to the proposed museum with the possibility of utilizing state funds, if available. According to the Flood Insurance Rate Map the site where the pedestrian access bridge is to be located is within a FEMA designated 100-year flood zone of Long Island Sound. As defined by section 25-68b(8) of the Connecticut General Statutes (CGS), Flood Management Act, proposed state activity that uses any state or federal grant or loan and affects land use requires a Flood Management Certification from DEEP.

The state agency that proposes to conduct the activity or provides funds for the project must certify that the activities that are going to be undertaken will be in compliance with the state's floodplain and stormwater management standards specified in section 25-68d of the CGS and section 25-68h-2 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA).

As part of the certification process the funding agency must certify that the activity complies with the National Flood Insurance Program and that the proposal promotes long-term non-intensive floodplain uses and has utilities located to discourage floodplain development. If an agency cannot meet any of these requirements which are found in the flood management statutes (section 25-68d) and / or regulations (section 25-68h-2 through 25-68h-3) the agency can request an exemption from these requirements. Construction of the pedestrian access bridge will require an exemption from section 25-68d (b) 4 of the CGS since the project is not promoting long-term non-intensive floodplain uses.

The pedestrian overpass is a separate but related action to the museum. According to Section 25-68b(d)(8) of the CGS, state actions are defined as both individual activities or and a sequence of planned activities. Although Flood Management Certification is a state authority and not directly required for the museum facility itself as a federal project, the standards of the Flood Management Act should be applied to the design of both the museum and the pedestrian access bridge to ensure a comprehensive approach is taken with both projects from a flood management perspective. The application of standards in the Flood Management Act should be discussed in section 2.4.8 Permits and Approvals.

National Flood Insurance Program (NFIP) Compliance

Page 2-10 (Figure 2.3-6 Plan View of Museum Building) and Page 4-8

This ground floor level will be located below the base flood elevation (BFE). The narrative states that the ground floor level would be “generally unoccupied”. The plan shows a loading dock with freight elevator, entrance lobby with passenger elevators, and rigging shop at this level. At this stage of design, no detail is provided as to finishing of these spaces or potential obstructions. FEMA regulations for VE zone structures contained in 44 CFR 60.3(e) state that areas below the BFE in VE zones must be free of obstruction and used solely for parking of vehicles, building access or storage. These areas cannot be finished spaces, but areas allowed to flood. As more detailed facility design progresses there should be close coordination with DEEP and FEMA to ensure compliance with NFIP requirements.

Land Acquisition

If the federal government desires to own the submerged lands, currently held by the State of Connecticut through DEEP, it will need to seek statutory authority for such acquisition. Further, this potential acquisition would not relieve the federal government from permitting requirements for building structures upon, filling, or dredging these submerged lands.

Authorization of Coastal Activities

In the discussion of Coastal Zone Management Act (CZMA) consistency review in Section 2.4.8, Permits and Approvals, it should be noted that because the museum when completed will be a Coast Guard facility the project is being reviewed as a direct federal action under the CZMA rather than under the state’s Structures, Dredging and Fill regulatory authority. The regulatory status of the project has recently been clarified, therefore DEEP’s July 17, 2017 comments based on the original Environmental Assessment are superseded by DEEP’s September 4, 2018 comments.

Coastal Resources

Table 2.5-1 should more clearly describe loss of benthic habitat and public trust area caused by encroachment and filling. The discussion of this topic on p. 4-7 addresses the proposed removal of a portion of the City Pier promenade for the purpose of offsetting the losses caused by encroachment. Because the City of New London owns the pier structure, the City will be required to submit a Certificate of Permission application seeking approval to remove a portion of the existing authorized City Pier. The authorized work could be conducted by the Coast Guard. This permitting requirement should be discussed in section 2.4.8, Permits and Approvals.

Water Dependent Use and Public Access

The Connecticut Coastal Management Act includes policies regarding priority and preference for water dependent uses at waterfront sites (CGS Section 22a-92(a)(3)). While the museum property will provide for some public recreational access to the waterfront, which is a water-dependent use, a museum building typically would not be considered a water-dependent use and would diminish the overall potential for other water-dependent use of the Site. Discussion of how the museum and its associated amenities will preserve existing and/or create new water-dependent uses at the site should be provided.

The increased use of the City Pier Plaza for museum-related activities may displace some existing public uses of the plaza. The SEA should provide further discussion of alteration of public use of the existing promenade used for public activities such as Sail Fest. Section 4.2.2 Recreation (p.4-2) should further detail the existing uses of the City Pier Plaza, specifically referencing the number of events held at the Plaza and attendance numbers if available and explain in more detail how the waterfront of the museum property would be used for public access and recreation. Agreement by the City of New London of the proposed modifications to and changing public use of City Pier Plaza should be indicated.

If you have any questions concerning these comments, please feel free to contact Micheal Grzywinski at (860) 424-3674 or at Micheal.Grzywinski@ct.gov.

cc: Brian Thompson, DEEP/LWRD
Micheal Grzywinski, DEEP/LWRD
Robert Hannon, DEEP/OPPD
Nicole Lugli, DEEP/OPPD

ROBERT FROMER
EJD, MSEE, P.C., P.E.

E-mail: saintrobert@comcast.net

September 4, 2018

Sent via Electronic Mail to: jgouin@mminc.com

Re: Additional Comment on the Draft Supplemental Environmental Assessment for the proposed National Coast Guard Museum

United States Coast Guard
c/o Milone & MacBroom, Inc.
(Attention: Jeanine Gouin)
99 Realty Drive
Cheshire, CT 06410

Dear Ms Gouin:

The following Public Notice appeared today in The Day newspaper:

26737 Notice of Public Hearing Concerning the Update of a Sea Level Change Scenario Pursuant to Public Act 18-82. The Connecticut Department of Energy and Environmental Protection (DEEP) will hold a public hearing concerning the update of a sea level change scenario on Tuesday, October 2, 2018, at 6 p.m., in the Gina McCarthy Auditorium, Department of Energy and Environmental Protection, 79 Elm St., Hartford CT. All members of the public are invited to attend. PURPOSE OF PUBLIC HEARING in accordance with Public Act 18-82, the University of Connecticut shall update and publish the sea level change scenarios published by the National Oceanic and Atmospheric Administration (NOAA) in Technical Report OAR CPO-1, and the Commissioner of the Department of Energy and Environmental Protection shall publish the sea level change scenario for the state. Such sea level change scenario shall guide municipal and state planning in the manner described in Public Act 18-82, including its use in the following planning documents: 1. Municipal evacuation or hazard mitigation plans; 2. The state's civil preparedness plan and program; 3. Municipal plans of conservation and development; and 4. Revisions to the state's plan of conservation and development. The Connecticut Institute for Resilience and Climate Adaptation (CIRCA) at the University of Connecticut has updated the sea level change scenarios as required in Public Act 18-82 and recommends a sea level change scenario that anticipates that sea level will be **0.5 m (1foot 8 inches) higher than the national tidal datum in Long Island Sound by 2050**. The analysis supporting this recommendation is available in the draft report entitled Sea Level Rise in Connecticut by James O'Donnell, available online at: /2018/03/27/sea-level-rise-projections-for-the-state-of-connecticut-webinar-recording-available/ Prior to such scenario taking effect for the purposes described by Public Act 18-82, the Department of Energy and Environmental Protection and CIRCA shall conduct one public hearing concerning such update. The hearing will include a presentation by CIRCA followed by an informal question and answer session. The

public will then be invited to give comments on the proposed update. WRITTEN COMMENTS in addition to the public hearing, DEEP will also receive written comments during the period through and including Friday, October 5, 2018. Written comments may be submitted via email to <https://circa.uconn.edu/2018/03/27/sea-level-rise-projections-for-the-state-of-connecticut-webinar-recording-available/> or sent to the Department of Energy and Environmental Protection, Attn. Brian Thompson, 79 Elm Street, Hartford, CT 06106. ADA PUBLICATION STATEMENT: The Connecticut Department of Energy and Environmental Protection is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at 860-418-5910 or Brian.Thompson@ct.gov September 4, 2018. Publishing Date Robert E. Kaliszewski, Deputy Commissioner Environmental Quality Branch(Emphasis added)

Comment: The Supplemental Environmental Assessment is obligated to fully address the consequences of a “0.5 m (1foot 8 inches) higher than the national tidal datum in Long Island Sound by 2050” and mitigation alternatives. The rise is not a singularity in 2050 but a continuous ever increasing rise.



Robert Fromer

APPENDIX A10
RESPONSE TO PUBLIC COMMENTS

**Pre-Decisional and Deliberative Communication
Summary of and Response to Public Comments
National Coast Guard Museum NEPA Supplemental Environmental Assessment
April 25, 2019**

INTRODUCTION

This document responds to comments received regarding the July 2018 Draft Supplemental Environmental Assessment (Draft SEA) for the National Coast Guard Museum (NCGM) in New London, Connecticut. The Draft SEA was made available for public comment from August 1, 2018 through September 4, 2018. The notice of availability was published in *The Day* newspaper publication, which is the predominant newspaper in the greater New London area. An electronic copy of the document was also made available on the National Coast Guard Museum Association’s (NCGMA’s) website and paper copies were available at the New London Public Library and at the offices of NCGMA. Comments were received from the Connecticut Department of Energy & Environmental Protection (CT DEEP), the State Historic Preservation Office (SHPO) and 30 individuals, some of whom provided several rounds of comment and others who anonymously provided comments and newspaper clippings. Table 1 presents a summary of all comments received (in chronological order). Copies are attached hereto and are included in their entirety in Appendix A9 of the Final SEA (FSEA). Where changes have been made to the analysis and/or SEA, the modified text is included herein. New text is indented, underlined, and shown in quotes. Added text is also underlined in the body of the FSEA.

**TABLE 1
Summary of Public Comments Received on the Draft SEA – National Coast Guard Museum Project**

Commenter	Date	Transmittal Mode
Doughty, Bryan ¹	07-31-18	Email
Andriopoulos, James E.	08-01-18	Email
Ericson, Bob and Joanne	08-01-18	Email
Fromer, Robert ¹	08-01-18	Email
Russo, Robert	08-01-18	Email
Terwilliger, Randy	08-01-18	Email
Blahun, George, Jr.	08-02-18	Email
Christina, Mary M.	08-02-18	Email
Christina Robert	08-02-18	Email
Doughty, Bryan ¹	08-02-18	Email
Gadbois, Mary	08-02-18	Email
Grossomanides, George	08-02-18	Email
Crowley, Lisa	08-03-18	Email
Online Feedback (Anonymous)	08-04-18	USPS
Fred & Ann (No Last Name Provided)	08-06-18	USPS
Munger, Susan	08-07-18	Email
Newspaper Clipping (Anonymous)	08-09-18	USPS
Ruitto, Joan	08-11-18	Email
Andrew, David	08-14-18	Email
Ryan, Edward	08-17-18	USPS
Letter to Editor (Anonymous)	08-20-18	USPS
Stutts, Susanne	08-22-18	USPS
Newberry, Penny	08-28-18	Email
D’Estang, Nancy	08-29-18	Facsimile
Fromer, Robert ¹	08-29-18	Email
Hennegan, Nancy	08-29-18	Email
Antonowicz, William	08-30-18	Email
Hutchins, Lloyd	08-30-18	Email
Lopez, Andrew	08-30-18	USPS
Pratt, Timothy	08-30-18	Email
Strohla, Nancy	08-30-18	Email
Arnold, David	08-30-18	Email
CT DEEP	09-04-18	Email
Fromer, Robert ¹	09-04-18	Email
State Historic Preservation Office	01-18-19	USPS

¹Provided more than one round of comments.

Table 2 on the following page provides a compilation of the comment topics and/or concern expressed in the individual comment letters. Agency comments are responded to individually below. Remaining comments are responded to by topic in order of frequency of comments.

RESPONSE TO AGENCY COMMENTS

Response to CT DEEP Comments

The Connecticut Department of Energy & Environmental Protection (CT DEEP) relayed comments on six topics, each discussed in detail below.

1. Flood Management Standards – CT DEEP correctly noted that construction of a pedestrian public access project is proposed by NCGMA from the Water Street parking garage to the proposed NCGM with the possibility of using state funds. CT DEEP recognized that the overpass is a separate but related action to the museum. The location of the proposed pedestrian bridge is within a Federal Emergency Management Agency (FEMA) designated 100-year flood zone and requires a Flood Management Certification (FMC) or FMC Exemption from CT DEEP. CT DEEP recommended that, while an FMC is not required for the NCGM, the standards of the Flood Management Act should be applied to the design of the museum as well as the pedestrian bridge and that application of such standards should be discussed in SEA Section 2.4.8 under Permits and Approvals.

Response: The overall approach to flood management and design considerations for the museum are discussed extensively throughout the SEA, including in Chapter 2.0 (Proposed Action and Alternatives, Section 2.3); Chapter 3.0 (Affected Environment, Section 3.6.2); and Chapter 4.0 (Environmental Consequences, Section 4.6.2). As indicated in the SEA, the NCGM will comply with the National Flood Insurance Program (NFIP) requirements as well as the eight-step decision-making process in compliance with Executive Order 11988.

The U.S. Coast Guard (USCG) recognizes the importance of a comprehensive approach to flood management, and while the FMC requirements do not directly apply to federal projects, the application materials for the pedestrian access project will describe the flood management components of the NCGM to which the pedestrian bridge will provide access. The following language has been added to Section 4.6.2 of the FSEA for clarification:

“The proposed NCGM is being designed in recognition of present and past flood threats, climate change, and sea level rise. Conservative design standards would have the lowest structural member of the lowest floor of the museum constructed above the 100-year flood elevation or base flood elevation (BFE) plus a factor of safety or freeboard on top of that. Some guidance suggests an elevation that is 1.25 times BFE, or in the case of the NCGM, at elevation 17.5 feet (datum NAVD88). Other guidance suggests an elevation that is BFE plus 2 feet (or 16.0 feet NAVD88). Still other guidance suggests an elevation commensurate with the 500-year flood elevation (18.1 feet NAVD88).

The design of the NCGM represents a conservative approach to flood mitigation. The lowest floor of the proposed NCGM will be at approximate elevation 23 feet or a full 9 feet above the BFE elevation, approximately 5 feet above the 500-year flood elevation, and well above published guidance measures. Structural design computations are being conducted using BFE plus 2 feet; and building design elements are NFIP (National Flood Insurance Program) compliant.”

The CT DEEP is considering Public Act 18-82 concerning an update of a sea level change scenario that anticipates a 36 inch rise in relation to the national tidal datum in Long Island Sound by 2050. The proposed elevation of the NCGM building is well above BFE plus the sea level rise projections for 2050 and beyond.

The USCG does not believe that further discussion of the permitting requirements of the pedestrian bridge is necessary in the SEA for the NCGM. Additionally, it is noted that permitting requirements were fully presented in the 2014 Environmental Impact Evaluation prepared for the pedestrian overpass public access project pursuant to the Connecticut Environmental Policy Act (CEPA), available at: http://www.ct.gov/ceq/lib/ceq/NCGM_EIE.pdf.

TABLE 2
Nature of Public Comments Received on the Draft SEA – National Coast Guard Museum Project

<i>Commenter</i>	<i>Location</i>	<i>Architecture/ Design</i>	<i>Flood Zone/ Climate Change</i>	<i>Views/Mass/ Aesthetics</i>	<i>Parking/ Traffic</i>	<i>Pedestrian Bridge</i>	<i>Public Process</i>	<i>Regulatory Requirements</i>	<i>Shoreline Fill</i>	<i>Cost</i>	<i>Const. Impacts</i>
CT DEEP			✓					✓	✓		
Andriopoulos		✓		✓							
Andrew		✓				✓					
Antonowicz	✓	✓	✓	✓		✓					
Arnold	✓						✓				
Blahun	✓		✓								
Cartoon Clipping			✓								
Christine M.	✓				✓	✓			✓		
Christine R.	✓										
Crowley	✓	✓	✓	✓							
D'Estang	✓	✓	✓				✓			✓	
Doughty	✓						✓				
Ericson	✓	✓									
Fred & Ann	✓	✓	✓		✓	✓					
Fromer*	✓	✓	✓	✓		✓	✓	✓			
Gadbois	✓	✓									
Grossomanides		✓									
Hennegan	✓		✓								
Hutchins	✓	✓	✓			✓					
Letter to Editor	✓	✓	✓	✓		✓			✓		
Lopez	✓		✓								
Munger	✓										✓
Newberry	✓	✓									
Online Feedback	✓	✓			✓		✓				
Pratt	✓			✓	✓	✓					
Ruitto		✓			✓					✓	
Russo	✓			✓	✓						
Ryan	✓				✓						
Strohla	✓		✓	✓							
Stutts	✓		✓	✓	✓						
Terwilliger	✓				✓	✓					

*Additional concerns include NEPA procedural compliance, energy consumption, air emissions, alternatives/site selection, coastal consistency, water dependency, resiliency, earthquake impacts, solid waste impacts, and lack of mitigation.

2. National Flood Insurance Program (NFIP) Compliance – CT DEEP noted that FEMA regulations for VE zone structures state that areas below the base flood elevation (BFE) in VE zones must be free of obstruction and used solely for parking of vehicles, building access, or storage and that these areas cannot be finished spaces, but areas allowed to flood. CT DEEP recommended that as more detailed facility design progresses, there should be close coordination with CT DEEP and FEMA to ensure compliance with the National Flood Insurance Program (NFIP) requirements.

Response: As indicated in the response to CT DEEP comment #1, the NCGM will comply with NFIP requirements. This is made clear in the SEA. The associated design elements are consistent with these requirements and will be reflected in future permit applications and authorizations, including permit programs administered by the Army Corps of Engineers (to which FEMA is an advisory federal agency). NFIP compliance is also addressed in the Coastal Consistency Determination (Final SEA Appendix B1), which will be submitted to CT DEEP for their concurrence.

3. Land Acquisition – CT DEEP noted that if the federal government desires to own the submerged lands currently held by the State of Connecticut through DEEP, it will need to seek statutory authority for such acquisition.

Response: 14 USC §98 requires that the NCGM be built in the City of New London on land that is federally owned and administered by the Coast Guard. Thus, the USCG will seek ownership of currently submerged lands upon which fill will be placed. State ownership commences at the mean high water line (elevation 0.9-feet) and extends seaward. The USCG has engaged representatives of the State of Connecticut relative to legislative authority required to transfer submerged lands currently held by the state to be transferred to the USCG. The Office of the Attorney General is currently in the process of drafting legislative language that addresses conveyance of these currently submerged state-owned public trust lands to USCG owned land, following construction of bulkhead and fill.

4. Authorization of Coastal Activities – CT DEEP clarified comments made during the public scoping period, which occurred in June and July 2017, relative to the review of the proposed museum project as a direct federal action under the Coastal Zone Management Act rather than under the state’s Structures, Dredging, and Fill regulatory authority.

Response: The USCG concurs that the NCGM is not governed by the Structures, Dredging, and Fill regulatory process. The Coastal Consistency Determination is included in the Final SEA as Appendix B1 and is attached hereto.

5. Coastal Resources – DEEP suggested that Table 2.5-1 of the Draft SEA should more clearly describe the loss of benthic habitat and public trust area caused by encroachment and filling. Additionally, DEEP requested that the permitting associated with the removal of a portion of the City Pier Plaza Promenade for the purpose of offsetting the losses caused by encroachment be discussed in SEA section 2.4.8, Permits and Approvals.

Response: The following narrative will be added to SEA Section 2.4.8, Permits and Approvals:

“The proposed partial demolition of the City Pier Plaza will require a separate permit from CT DEEP. In that instance, the permittee will be the City of New London. The work will be privately funded through the NCGMA. The Mayor, City Council, and administrative officials in New London have been provided with detailed information concerning the proposed actions, schematic designs of the museum, and survey information related to the site and affected areas and have expressed concurrence with this approach. A letter of support from the City is included in FSEA Appendix A and attached hereto.”

Benthic impacts are analyzed in Section 4.8 of the SEA. A new row has been included in summary Table 2.5-1 to address benthic habitat as follows:

Resource	No Action Alternative	Proposed Action Alternative
<u>"Benthic Habitat"</u>	<u>"No impacts to biological resources"</u>	<u>"Affected areas include the intertidal zone, which extends from 1.7 feet North American Vertical Datum (NAVD) to -0.9 feet NAVD (mean tidal range 2.6 feet), and the immediate subtidal zone, which extends from -0.9 feet NAVD to the limit of disturbance located at approximately -9.0 feet NAVD. Currently, the intertidal area is comprised of rubble and fill material that was used to stabilize the narrow interface between marine and terrestrial environments. Direct impact to the benthic environment will occur, including intertidal and sub-tidal environments. Of the total impact area, approximately two thirds are currently covered by the pile supported City Pier Plaza Promenade. Approximately 3,100 square feet of new encroachment will occur. To offset this encroachment, an approximate equivalent amount of existing City Pier Plaza promenade structure south of the proposed museum building will be removed to daylight the Thames River. Though a portion of the benthic environment will be filled, the concurrent installation of vertical sheet piling may mitigate the loss of benthos by providing vertical structure as substrate for a number of fouling species of organisms to colonize."</u>

6. Water Dependent Use and Public Access – CT DEEP requested additional discussion of how the museum and its associated amenities will preserve existing and/or create new water-dependent uses at the site, including further discussion on alteration of the public use of the existing promenade. CT DEEP requested additional discussion in SEA section 4.2.2 (Recreation), providing details on the current and historic activities at the City Pier Plaza and how the museum property would be used for public access and recreation, along with an indication that the City of New London is in agreement with the proposed changes.

Response: Water dependent uses and public access are described in SEA Sections 3.2 (Affected Environment; Land Use and Recreation), 4.2 (Environmental Consequences; Land Use and Recreation), and 4.16.2 (Evaluation of Cumulative Impacts). As indicated in the SEA, a portion of the proposed NCGM will be constructed upon land that has historically been used for vehicular parking associated with the adjacent Cross Sound Ferry Services operation. This is an undeveloped gravel lot that has not historically been accessible to the public. The remainder of the proposed NCGM will be constructed on a portion of the existing City Pier Plaza. As presented in Sections 2.3.7 and 4.8.2 of the SEA, impacts would occur on the City Pier Plaza by virtue of:

- a. encroachment onto a portion of the existing plaza to accommodate the museum; and
- b. removal of approximately 3,100 square feet of existing plaza to provide additional open water for recreational use and to mitigate the proposed fill area along the river shoreline that would be displaced to construct bulkheading and fill.

The following supplemental language has been added to Section 4.2.2 of the FSEA:

"Approximately 10,650 square feet of City Pier promenade will be removed to accommodate the project, with 15,950 square feet remaining intact and available for public use following museum construction. An additional 5,800 square feet of outdoor public space will be created at ground level associated with the NCGM. This results in an effective public area that is nearly 80% of existing public space today. This combined area will remain open to public access.

Unlike other waterfront buildings including museums or educational facilities, the NCGM will be the public's museum, affording meaningful public access to and through the structure itself. The museum will be free to all visitors during established regular hours of operation.

Integral to the vision and design for the NCGM is connecting people with the waterfront, not only through unhindered waterfront access, but through documentation of the history of coastal waters, the role of the

USCG, and through water exhibits that would extend the NCGM's reach beyond the physical walls by bringing the visiting public outside to view in-water exhibits and activities. Outdoor and in-water exhibits, as well as interactive activities would be key elements of the museum, with scheduled demonstrations and displays providing opportunities for the public to interact with the shoreline and with Coast Guard members. The adjacent City Pier also provides opportunities for vessels to visit the area, providing opportunities to bring maritime watercraft to the museum visitor's experience.

The presence of the NCGM would be anticipated to increase patronage to the City Pier Plaza and City Pier; and visitation by museum patrons would be consistent with and augment public use of these facilities. In September of 2008, White Oak Associates, Inc. conducted a Strategic Master Plan for the NCGM. This study was updated in February of 2014. The conducted projected a tenfold increase in visitation to over 200,000 visitors annually. The museum would offer a new opportunity for public use and waterfront access. A publicly accessible waterfront area would replace the former private parking area, with an at-grade interface with the Thames River. Construction of the NCGM would not restrict pedestrian circulation along the river's edge. The at-grade level of the museum would provide open access to the waterfront and to City Pier Plaza.

Records are not kept on the visitation of City Pier or at the adjacent City Pier Plaza. Anecdotal observations over a number of years indicate that, with the exception of specific, limited festival days and events, the City Pier Plaza is underutilized and often empty or nearly so during the weekdays and off-season. At the same time, use of the plaza for events, particularly in the months of July and August, are important to the vitality and sense of community in downtown New London.

City Pier hosts numerous events, most notably the annual Sailfest, which occupies the pier itself, the adjacent City Pier Plaza, and the surrounding downtown area including Parade Park, with street vendors along Bank Street, Water Street, State Street, and surrounding areas. A recent study found that in 2018 Sailfest brought \$58.2 M in economic value and 279,000 visitors to the Thames River Region. City Pier Plaza accepts the spill-over from the Pier during this event and has been used to accommodate support uses, such as beer tents. While a portion of the City Pier Plaza would be occupied by the future NCGM, additional waterfront area to the north of the current plaza would be open to the public, as would the museum proper. The focal point of Sailfest is City Pier and the docked vessels would be complemented by the presence of the NCGM and its maritime heritage.

Other historic activities occurring along the Thames River waterfront include the Thames River Heritage Park Taxi, Thames River Quest, Make Music, Blues and BBQ, and Downtown Live, all of which take place on the pier itself. Parade Plaza, across Water Street also hosts community activities, including weekly music events and the Nimble Arts Circus. Other events that take place in the downtown New London vicinity include The Currach Regatta, Blues and Brews Festival, Connecticut Family Festival, and the Connecticut Maritime Heritage Festival. These activities would continue unhindered following construction of the NCGM.

Given the proposed use and opportunities associated with the NCGM, impacts associated with the smaller plaza area are expected to be offset by the enhanced activity that would result from the museum's entrance facing the plaza. Public access across the site will be encouraged and overall public access would increase through the conversion of a historically private parking lot to a public museum space and sheltered riverwalk along the exterior of the museum at grade, providing outdoor space for waterfront visitors who are not necessarily museum visitors.

The NCGM will be an important feature of the historic, educational and cultural offerings in this waterfront community, and a contributing presence for the events and maritime activities that New London is known for. From its location adjacent to City Pier, the NCGM will be a visible addition, presenting additional venue opportunities for visitors. As evident with the Maritime Heritage Festival, Celebrate New London and other

water-focused events, New London has a long-standing relationship with the maritime community and the USCG.”

Discussions with City representatives have been ongoing, with agreement by the City on the additional land acquisition proposed in the SEA as well as the demolition of a portion of the existing plaza. A letter of support from the City is included in FSEA Appendix A and attached hereto.

Response to Comments from the State Historic Preservation Office

The State Historic Preservation Office relayed comments on January 18, 2019 as part of the ongoing Section 106 consultation. In that letter, SHPO indicated that it anticipates that for the purposes of NEPA, there will be no significant impacts to historic resources. However, the information contained in the SEA did not fully satisfy the requirements of the Section 106 process. A significant number of their comments related to the characterization of existing conditions. The following narrative was added to Section 3.9.1 of the FSEA (No Action Alternative) to address their comments:

In 2017, the Hodges Square neighborhood, situated between the Academy and the I-95 corridor to the south, was officially recognized as a Historic District.

Native American and Colonial American settlement patterns along major waterways, such as the Thames River, are well documented. An extensive Thames River drainage archaeological survey by Harold Juli recorded one pre-contact site on the Coast Guard Academy campus, the Coast Guard Academy Rockshelter site (95-6), and another just to the north of the Academy, the Connecticut College Soccer Field site (95-4).

The following narrative was added to Section 3.9.2 of the FSEA (Proposed Action Alternative):

The historic resources APE, often referred to as a Study Area, takes into account direct and indirect effects (e.g. visual and contextual impacts). The APE, defined in consultation with SHPO, extends 2,250 feet from the project site and includes a number of recognized aboveground NRHP buildings, structures, and districts that surround the project area. As discussed below, the project site is on the waterfront and across the railroad tracks from the long-established Downtown New London Historic District. However, there are numerous individually NRHP-listed historic properties within the District, as well as many NRHP-listed properties and two smaller districts within the 2,250-foot APE that contribute to New London’s significant heritage. The 2,250-foot historic resources APE include the districts, buildings, and structures listed in Table 3.9-1. Each is discussed below.

Across the Thames River and outside the 2,250-foot APE are two NRHP Districts that flank the Groton shoreline. The 50-acre NRHP-listed Groton Bank Historic District (National Register Information System [NRIS] 83001287) is on the opposite or eastern bank of the Thames River, below NRHP-listed Fort Griswold (NRIS 70000694), which is approximately 16 acres in area. Fort Griswold is marked by the prominently sited Groton Monument, a 135-foot-tall stone obelisk. These Groton historic district resources are separated from the project site by more than 2,500 feet and a broad expanse of a busy waterway, with the dominant railroad bridge and soaring I-95 crossings to the north of both.

The 8.3-acre NRHP-listed Central Vermont Railroad Pier (NRIS 04001551) is north of the Downtown District and across an open ferry channel from the project site but lies within the 2,250-foot APE. It is an earth-filled masonry structure. See Figure 3.9-1 for the location.

Two additional nationally recognized districts are within the 2,250 foot APE for historic resources: The four-property residential Whale Oil Historic District and the Coit Street Historic District on the southern perimeter of the Downtown Historic District. Each District, as well as individually listed Properties, are identified on Table 3.9-1, illustrated on Figure 3.9-1, and discussed below.

TABLE 3.9-1
Properties and Districts Listed on the National Register of Historic Places
within 2,250 Feet of the NCGM Project Site

<u>NRIS #</u>	<u>NAME</u>	<u>ADDRESS</u>	<u>RESOURCE TYPE</u>	<u>COMMENTS</u>
<u>86000124</u>	<u>US Post Office - Main</u>	<u>27 Masonic Street</u>	<u>building</u>	<u>Not in a District</u>
<u>76001992</u>	<u>Acors Barns House</u>	<u>68 Federal Street</u>	<u>building</u>	<u>Not in a District</u>
<u>90001098</u>	<u>St. James Episcopal Church</u>	<u>125 Huntington Street</u>	<u>building</u>	<u>Not in a District</u>
<u>70000714</u>	<u>Whale Oil Row</u>	<u>105-119 Huntington Street</u>	<u>District</u>	<u>4 residential buildings</u>
<u>71000913</u>	<u>New London Railroad/Union Station</u>	<u>State Street</u>	<u>building</u>	<u>Adjacent to proposed museum and within Downtown New London Historic District</u>
<u>79002665 / 88000070</u>	<u>Downtown New London Historic District/aka Historic Waterfront District</u>	<u>(1979) Original bounds along Captain's Walk, Bank Street/Thames River, Tilley and Washington Streets. (1988) Boundary increase along Huntington, Washington and Jay Streets.; SW corner of Meridan and Gov. Winthrop Blvd.; along Bank and Sparyard Streets.</u>	<u>District</u>	<u>190 buildings in original 1979 designation, including buildings listed on NRHP independently of the Historic District (e.g., the New London Customhouse and the Shaw Mansion); 33 buildings added in the 1988 boundary increase</u>
<u>#040015510</u>	<u>Vermont Railroad Pier</u>	<u>State Pier Road</u>	<u>(earth-filled masonry) structure</u>	<u>NRHP Areas of Significance: Transportation and Engineering</u>
<u>70000706</u>	<u>New London Customhouse</u>	<u>150 Bank Street</u>	<u>building</u>	<u>Within the Downtown New London Historic District; serves as a museum</u>
<u>88000068</u>	<u>Coit Street Historic District</u>	<u>Roughly bounded by Coit, Washington, Tilby, Bank, and Reed</u>	<u>District</u>	<u>33-buildings district that abuts southern edge of the Downtown New London Historic District [Note: The abutting Coit Street West Historic District (2014) is beyond the 2,250-ft Study Area/APE]</u>
<u>82004377</u>	<u>Huntington Street Baptist Church</u>	<u>29 Huntington Street</u>	<u>building</u>	<u>Within the Downtown New London Historic District</u>
<u>70000712</u>	<u>New London Public Library</u>	<u>63 Huntington Street</u>	<u>building</u>	<u>Within the Downtown New London Historic District</u>
<u>70000705</u>	<u>New London County Courthouse</u>	<u>70 Huntington Street</u>	<u>building</u>	<u>Within the Downtown New London Historic District</u>
<u>70000713</u>	<u>Shaw Mansion</u>	<u>11 Blinman Road</u>	<u>building</u>	<u>Within the Downtown New London Historic District; serves as a museum</u>

Historic Architectural Resources

Figure 3.9-1 depicts significant, National Register-listed historical resources within the 2,250-foot Area of Potential Effect (APE) of the project site. The APE has been defined as a reasonable sphere of concern for both contextual and visual perspectives. The APE includes maritime commercial resources within the Thames River waterfront, as well as civic structures on higher elevations within the downtown neighborhood. Each of the identified resources is presented in Table 3.9-1.

The 78-acre Downtown New London Historic District (National Register Information System [NRIS] 790026651/88000070, boundary increase) includes a total of 223 structures. The NCGM project site is within the extreme northeastern edge of this NRHP Historic District, as the commercial, residential, and civic properties transition into later industrial properties.

As noted on Table 3.9-1, a number of individually NRHP-listed properties are within the Downtown New London Historic District, including the New London Public Library, the Huntington Street Baptist Church, the Shaw Mansion, the U.S. Customhouse, and the neighboring Union Station. Of the individually listed NRHP properties outside of the Downtown New London Historic District, the closest is the Central Vermont Railroad Pier, discussed below.

The 8.3-acre NRHP-listed Central Vermont Railroad Pier (NRIS 04001551) is north and east of the downtown district and separated by an active ferry channel from the NCGM project site.

Archaeological Resources

Certain NRHP-listed properties, e.g., the Shaw Mansion and the U.S. Customhouse, are listed as archaeological resources with the Office of State Archaeology in addition to recognition as Historic Resources.

However, there are no pre-contact archaeological sites listed with the Office of State Archaeology within one mile of the NCGM project APE. This is undoubtedly due to the intense and extended development and occupation of the New London waterfront. Archeological sites are listed in Table 3.9-2 and are shown graphically in Figure 3.9-2.

Archaeological investigations and additional archaeological monitoring since 1992 have yielded the identification of historic archaeological sites. Three waterfront archaeological sites, 95-11, 95-12, and 95-16 are in proximity to the USCGM site. These site types (disturbed and/or deteriorating wharf/dock timbers), recovered collections, and comparability to the project APE have been taken into consideration when evaluating the archaeological potential for the APE to contribute significantly to our understanding of the past.

Local repositories accessed included the New London Public Library, Local History Collection, the Groton Public Library, the Connecticut Department of Economic and Community Development/State Historic Preservation Office (DECD/SHPO), and the Office of State Archaeology. Various on-line resources on New London history were also valuable repositories, e.g., the New London Country Historical Society (<https://www.nlchs.org/>) and the New London Landmarks, Inc. (<https://www.newlondonlandmarks.org/archives-and-resources>).

TABLE 3.9-2
CT Historic Archeologic Sites within One Mile of NCGM Location*

<u>Site Reference</u>	<u>Name/Locations</u>	<u>Period of Significance</u>	<u>Comments</u>	<u>Inventory Form Author/Date</u>
<u>Groton: 59-102</u>	<u>Groton Marine Dock Marine Railway</u>	<u>Ca 1946-1975</u>	<u>Commercial and Industrial</u>	<u>Raber Associates, 2006</u>
<u>Groton: 59-20</u>	<u>Fort Griswold</u>	<u>ca. 1781-1948</u>	<u>Revolutionary War battle site; 5-acre state park</u>	<u>CAS, 1979</u>
<u>New London: 95-1</u>	<u>Central Vermont Railroad Pier, at end of Thomas Griffin Road</u>	<u>1876 - 1946</u>	<u>An earth-filled granite block structure for steamship - rail freight interchange.</u>	<u>PAST, Inc. 2002</u>
<u>New London: 95-7</u>	<u>Allanach Carriage House, 16 Cottage Street</u>	<u>ca. 1890 - 1940</u>	<u>Domestic. Relocated in 1988 for State Project - site compromised</u>	<u>Historical Perspectives, Inc., 1982</u>
<u>New London: 95-8</u>	<u>Prentis - Palmer House, 18 Broad Street</u>	<u>ca. 1845 - 1940</u>	<u>Domestic. Demolished in 1988 for State Project - site compromised</u>	<u>Historical Perspectives, Inc., 1982</u>
<u>New London: 95-9</u>	<u>Columbus Circle Gravestones, 20 ft. east of monument in traffic circle at Bank St. and Howard intersection.</u>	<u>Recovered Gravestone dated 1871</u>	<u>Remnants of former monument business in proximity to ConnDOT roadwork. NOT A CEMETERY SITE</u>	<u>Harold Juli, Connecticut College, 1979</u>
<u>New London: 95-10</u>	<u>New London Mills, Pequot Ave. south of Trumbull St.</u>	<u>est. 1850 - 1940</u>	<u>19th and/or 20th C. marine steel hulls within landfill soils. Not fully investigated.</u>	<u>PAST, Inc., 1990</u>
<u>New London: 95-11</u>	<u>South Water Street, North of 95-12 and U.S. Customhouse (150 Bank Steet)</u>	<u>18th - early 19th C.</u>	<u>Domestic artifacts (stoneware, creamware, Westerwald, kaolin pipe, delftware) within fill of possible displaced wharf, dock or mooring timbers. Disturbed context.</u>	<u>PAST, Inc., 1992</u>
<u>New London: 95-12</u>	<u>South Water Street, North of U.S. Customhouse (150 Bank Steet)</u>	<u>ca. 1810-1860</u>	<u>Domestic scatter within fill of possible displaced wharf, dock or mooring timbers. Disturbed context.</u>	<u>PAST, Inc., 1992</u>
<u>New London: 95-13</u>	<u>Shaw Mansion</u>	<u>1756</u>	<u>Merchant's house and the state's naval offices during American Revolutionary War. Currently, New London County Historical Soc. offices.</u>	<u>No files at OSA</u>
<u>New London: 95-14</u>	<u>U.S. Customhouse, 150 Bank Street</u>	<u>1833</u>	<u>Original granite wall enclosing the property identified during utility trench monitoring. Protected in situ.</u>	<u>PAST, Inc., 1992</u>
<u>New London: 95-16</u>	<u>Parade Plank Wharf, between Water Street and the Waterfront at foot of Parade</u>	<u>mid-19th to mid-20th C.</u>	<u>Approx. 15 deteriorated wooden piles remaining of plank wharf from period of shift in waterfront activities to accommodate introduction of rail traffic. Some artifacts in association.</u>	<u>ACS, G. Walwer, 1999</u>
<u>New London: 95-19</u>	<u>Frink's Wharf, Bank Street waterfront north of USCG pier</u>	<u>later 18th C. - early 20th C.</u>	<u>Wharf assoc. with major New London whaling family; Commercial and Industrial</u>	<u>ACS, G. Walwer, 1999</u>
<u>New London: 95-20</u>	<u>Turntable/Engine House, New Haven and New London Railroad, in Amtrak railyard off of Walbach</u>	<u>1852</u>	<u>Archaeological investigation of foundation remains of turntable and engine house. Designated a State Archaeological Preserve. Currently, a parking lot.</u>	<u>Historical Perspectives, 2001</u>

*Historic Resources Inventory Forms and one-mile map provided by the Office of State Archeology (Brian Jones 4/12/19)

Laydown Areas During Construction

As discussed in Chapter 2, the project site is extremely limited by the river and the rail corridor and cannot support laydown and staging during construction. The contractors will rely on a combination of off-site staging and laydown areas, specifically an off-shore barge and one or more paved riverfront open lots. Four potential laydown areas along the waterfront have been identified, designated as A, B, C, and D. Figure 3.9-3 is a map of these four areas in relation to the project site; a close-up view of each potential laydown also follows (Figures 3.9-3 through 3.9-7). Land use at all of these paved locations consists of previously developed areas located in the vicinity of the project site as follows.

Area A lies west of Fairview Avenue on the Thames River in Groton. The site is located immediately beneath and to the north and south of the Gold Star Memorial Bridge. The site consists of a small brick building and a paved parking area. Individual residential homes are located on the eastern side of Fairview Avenue. The potential laydown area at Mohawk Northeast is presently developed with storage buildings and docking facilities (three piers), which would allow materials to be transported by barge. Deliveries to the project site via road could occur via Fairview Avenue, Bridge Street, Interstate 95, Eugene O'Neill Drive, and State Street.

Area B lies east of Eastern Avenue on the Thames River in New London immediately north of the Goldstar Memorial Bridge in an area of mixed residential/industrial uses. The potential laydown area is presently developed with storage buildings and soil piles. An at-grade railroad crossing is present, which would allow materials to be transported by barge (one pier) or truck. Deliveries to the project site via road would occur via industrial portions of Eastern Avenue, Lewis Street, Crystal Avenue, Eugene O'Neill Drive, and State Street.

Area C lies north of the project site at State Pier in New London. Surrounding land uses are industrial, and the pier is essentially covered by pavement and buildings. Access to the site is via State Pier Road and Crystal Avenue, and materials could be transported via barge to the project site.

Area D lies immediately north of the project site at Cross Sound Ferry in New London. Surrounding land uses are commercial or maritime. The site is heavily used for ferry transportation and in particular the queuing of ferry traffic.

SHPO had additional comments relative to the characterization and documentation of environmental consequences. The following narrative was added to Section 4.9.2 (Proposed Action Alternative) to address SHPO's comments:

The following evaluation is in compliance with federal guidelines for an assessment of adverse effects on historic properties (36 CFR 800.5). An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Future construction of an elevated six-story, approximately 80,000-square-foot NCGM on the New London downtown waterfront would result in the introduction of visual elements that have the potential to diminish the significance of several NRHP-listed historic districts and individual historic properties, as per the National Historic Preservation Act (NHPA; Public Law 89-665; 54 U.S.C. 300101 et seq.). As detailed in the prior Section 3.9, the project site is immediately outside the boundaries of one NRHP-listed historic district and within 2,250 feet of two additional NRHP-listed districts and nine individually-listed NRHP properties in Downtown New London. See Table 3.9-1 for each of these recognized resources.

A related proposed pedestrian bridge to connect the NCGM with the inboard City of New London parking garage is funded by the State of Connecticut. The pedestrian bridge is undergoing a separate Section 106 (36 CFR 800.5) review consultation with SHPO.

Although the development of the NCGM would alter views in the New London Historic District, the conceptual design of the NCGM is intended to fit sympathetically in the transition from the historic district to the more industrialized properties to the immediately north along the waterfront. The final design details and materials will be decided in consultation with the State Historic Preservation Office. The new structure will be recognizably of this era but also broken down in scale to acknowledge its component parts and the scale of its urban context and its relationship to the waterfront. For example, the building will be more expressive from the Thames River viewpoint where it will obscure the view of the nearby parking garage but will express more quiet details from the Parade Plaza viewpoint where it is a backdrop for Richardson's iconic train station.

A critical component of the design process will be maintenance of the architectural integrity of the adjacent Union Station building and the neighboring historic district as a whole, as well as individual historic resources both during construction and the subsequent operation of the museum.

The project site is situated at the extreme northeastern edge of the Downtown Historic District, outboard of the railroad tracks that parallel the Thames River to the east. This is the transition point between the pre-1850 resources of historic, small-scale New London and the subsequent large-scale industrialization of the waterfront to meet the more rigorous demands of modern transportation, such as railroad yards and shipping piers, ferry slips, and massive parking garages.

The 1876 Central Vermont Railroad Pier (NRIS 04001551), north of the proposed museum site, projects in a southwesterly direction into the New London Harbor (Clouette, 2004:7-1). A character-defining feature of this structure is the waterfront and railroad track setting, which will not be affected by the NCGM project. The Pier's association with the Thames River transportation heritage will not be affected by the NCGM project.

Archaeological Resources

No formal archaeological survey has been conducted to date in the tightly limited project APE.

An extensive Thames River drainage archaeological survey by Harold Juli did record a number of pre-contact sites north of the active New London waterfront (Juli 1994). The two closest pre-contact sites identified by Julie include the Coast Guard Academy Rockshelter Site (95:006) and the more northerly Connecticut College Soccer Field Site (95:004). Again, these sites are far outside the project area and have not been subject to the extreme subsurface changes on the landfilled and manipulated waterfront between the railroad tracks and the river. As Julie concluded (1994:39), the Thames River drainage has been highly disrupted and bears an overall poor rating with respect to the integrity of pre-contact archaeological sites.

As noted in Table 3.9-2 and Figure 3.9-2, archaeological excavations and monitoring have been conducted south of the APE indicating that specific sections of the New London riverfront possess a high potential to contain buried historic archaeological resources related to the maritime history of New London. The archaeological sensitivity of the New London waterfront is not directly applicable to the relatively late landfilled lots outboard of the rail corridor north of State Street. The following discussion focuses on the distinction between the non-APE waterfront areas of high sensitivity and the APE.

The wider project area is well documented for hosting archaeological resources related to the maritime history of New London, which could include but not be limited to maritime suppliers and wharves, docks, and slips dating as early as the eighteenth century. Archaeological reports from the last forty years revealed buried resources instructive of this past, as noted in Table 3.9-2. However, it is critical to compare the location of the APE, outboard of the mid-nineteenth-century landfilled and bulkheaded rail corridor, and the eighteenth through the early twentieth century maritime wharves and businesses to the south (See Table 3.9-2 and Figure 3.9-2).

Mapped and recorded activities on the APE are related to industries that have been demonstrated to leave a minimal archaeological footprint: coal yards, lumber sheds, planing mills, warehouses, etc. These resource types do not typically leave behind distinctive foundations and/or associations that provide insights not gained through existing studies and/or documents (Hartgen Archeological Associates, Inc. and Historical Perspectives, Inc., 1995).

The wharves and piers of the post-1850 era reflect a growing standardization of joinery, cribbing, and bulkheading techniques. The earlier haphazard approach to development and a plethora of vernacular designs and building techniques along the waterfront gave way as the century progressed, particularly after the Civil War when improved port facilities were urgently needed, the size of new steamships required longer piers and deeper berths, use of steam-driven pile drivers expanded, and engineering techniques were increasingly standardized. The archaeological study of these later generations of more standardized wharves and piers has not proven to provide a window into local technological adaptations (Hartgen Archeological Associates, Inc. and Historical Perspectives, Inc., 1995).

Research and analysis indicate that the possibility for *in-situ* pre-contact archaeological resources east of the rail corridor is not anticipated (Saunders and Schneiderman-Fox, 2000). As noted, the Office of State Archaeology has no record of pre-contact archaeological resources within one mile of the project site.

Historic and Cultural Resources – In 2014, the Coast Guard initiated consultation with the Connecticut SHPO under Section 106 of the NHPA. Consultation was reinitiated in 2017 and is ongoing. The SHPO consultation correspondence is included as Appendix D.

Continued SHPO consultations through each phase of the design process will be undertaken in order to minimize or avoid any adverse effect to identified historic resources through choices on materials, signage, fenestration, etc.

Potential Impacts on Off-Site Staging and Laydown Areas – The off-site staging and laydown areas, in addition to an off-shore barge, have been identified (Figures 3.9-3 to 3.9-7). Each of the in-board staging and laydown sites, to be used primarily as storage of materials and equipment, is currently covered with asphalt, which will remain as a protection barrier against accidental subsurface impact. Given the lack of excavation and the asphalt surface to prevent disturbances, impacts to cultural resources are not anticipated in the off-site staging and laydown areas.

RESPONSE TO PUBLIC COMMENTS

Responses to public comments are provided below by topic. Refer to Table 2 for a cross-reference to commenters.

1. *Location* – Members of the public expressed concern relative to the location of the proposed museum. A significant number of commenters indicated a desire to see the museum constructed at Fort Trumbull or at another downtown location within the City of New London. Others indicated a concern related to the proximity to the train station.

Response: As indicated in the SEA Section 1.3, the 2014 EA and earlier studies evaluated alternative locations for the NCGM. This was a decades long process that led to the selection of the current site. SEA Section 2.2 further described the legislation authorizing the establishment of the National Coast Guard Museum (14 USC §98), which requires that the museum be built in the City of New London on land that is federally owned and administered by the Coast Guard. Additionally, it is noted that the Coast Guard cannot solicit land, but rather land must be made available and offered to the Coast Guard. The selected site for the NCGM was identified following analysis of alternative sites that met these criteria. These analyses were conducted as part of the *Final Environmental Assessment: Proposed Coast Guard Acquisition and Operation of a Privately Constructed New National Coast Guard Museum (2008)*, the *Strategic Master Plans: for the National Coast Guard Museum (2008 and 2014)* and

the 2014 NEPA Environmental Assessment for National Coast Guard Museum Project. These studies analyzed numerous locations for the museum, including the existing Coast Guard Museum in Waesche Hall at the Coast Guard Academy, Riverside Park, three locations in Fort Trumbull, and the downtown New London waterfront site.

Alternatives presented in the 2014 EA were evaluated using criteria the Coast Guard developed based on the requirements outlined in 14 USC §98. The following alternatives were studied and incorporated by reference into the 2014 EA:

- No Action
- Fort Trumbull Alternatives
- Riverside Park Alternatives
- Water Street (Selected Alternative)

Alternatives considered but eliminated from further study included the following:

- Virtual Museum
- Union Station
- Norwich State Hospital
- Fort Trumbull State Park

The Fort Trumbull site was found to be not viable.

The analysis contained in the 2014 EA resulted in a Finding of No Significant Impact (FONSI) and the site was subsequently gifted to the Coast Guard. Site analysis and ultimate selection was an extensive process that occurred over many years. The purpose of the SEA was to evaluate potential construction and operational impacts of the NCGM, and not to evaluate new or alternate sites. Therefore additional locations were not considered as part of the SEA.

2. *Architecture/Design (Including Views, Building Massing, and Aesthetics)* – Members of the public expressed concern relative to the museum building architecture, its overall size in comparison to surrounding buildings, and barriers to waterfront views from the land side and/or views of the downtown from the water.

Response: The following narrative has been added to Section 2.3.2 of the FSEA:

“The Secretary of the Interior’s Standards for the Treatment of Historic Properties provide architects and planners with general advisory guidelines and best practices to promote historic preservation. New construction adjacent to Union Station is being designed to be differentiated from the existing structure to maintain the station’s historic character. The museum building design presents a quiet façade facing the train station and Parade Plaza, so that the museum would remain deferential and recessive to the train station. From the waterfront, the building would be more sculptural and expressive of its cultural significance to the city, but through its distinct and modern architectural language would complement, rather than compete with the historic train station.”

In response to early consultations with the State Historic Preservation Office (SHPO), the museum design is sensitive in how the new structures would interact with Union Station and the downtown area around Parade Plaza. The updated design includes an extension of the pedestrian bridge to the south, embedded within the volume of the museum. Pedestrian pathways for those people arriving at grade and from the bridge would be joined at the southwest corner of the building in a large, full-height entrance vestibule that would include an iconic rescue helicopter display. This soft corner of the building is being designed to provide a visual window into and through the museum from vantage points downtown and Union Station, as well as expand the view corridor between the two buildings toward the waterfront. This would allow for far greater openness as perceived from the train platform and a greater visibility of the full train station façade from the water.”

Moving the museum entrance from the waterfront edge (as in earlier design iterations) to the south side of the building would provide for greater connection to the public realm at the ground level. Activating City Pier Plaza with the museum’s entrance and glass atrium façade would encourage visitors to arrive at grade and increase pedestrian traffic at street level.

The waterfront site in the heart of New London provides a setting for the new museum that ensures the facility will contribute to and benefit from the vibrancy of the transportation hub and downtown business district. The rich history of New London is a significant factor to be considered in the design of the building. In particular, the structure is planned for the northern boundary of the City’s historic district and is in direct dialog with Architect H.H. Richardson’s celebrated train station.

The NCGM has been designed to ensure that the new museum would protect views to the train station and ensure it maintained its essential connection to the waterfront. To that end, the previous designs focused on glass and transparency to the waterfront, with a more closed-off attitude to the west facing the train station and downtown. The design was refined in response to consultation with the State Historic Preservation Office (SHPO) and public comments. The current design reflects this input through the following design features:

- **Pedestrian Connector Path**

The pedestrian connector is required to extend from the parking garage to the waterfront providing access to points in-between including the train station north bound platform. Because it must pass between the catenary wire stanchions (train power line supports) placement of the connector is limited in the routes that can be mapped. Initially, the connector was slated to take a direct route from the parking garage to the waterfront. This required demolition of the existing brick bus station structure. While the SHPO determined during the 2014 Environmental Assessment process that this structure, while of interest, need not be preserved, the current design has been modified to avoid elimination of the existing brick structure while still maintaining access to the train platforms.

The pedestrian connector now follows a sweeping path designed to stay as far north as possible, keeping well clear of the train station and reinforcing the sense of the Parade Plaza “urban room” that is currently defined by the train station to the east, older buildings on State Street to the south, and the more contemporary garage to the north. The pedestrian connector provides a natural extension of the garage demarcation and maintains a simple clarity of design and transparency that keeps it from competing with the existing architecture of New London.

The new design for the connector also provides an extension to the south on the waterfront side so pedestrians can experience a comprehensive view of downtown New London and also an unfettered view of the train station from three sides.

- **Connection to City Pier Plaza**

In response to the desire for the building to address the city as well as the waterfront, the design has been reconfigured so that the true front door now faces City Pier Plaza instead of the water. This reinforces the connection to the city and will create more activity on City Pier Plaza. This orientation will also help to define the museum and pedestrian connector as a natural terminus for the new river walk which currently extends from Shaw Cove up to the proposed site but then dead-ends at Cross Sound Ferry’s property line and gravel parking lot.

The new entrance also incorporates a multi-storied glass entrance vestibule on the southwest corner of the building. This placement is strategically selected to make the building feel lighter and more transparent as it nears the train station. This is particularly driven to provide views through the

building expanding the view to the train station from the waterfront and to the waterfront from the train platform and pedestrian connector.

Reinforcing the idea that the museum connects back to the City and train station, the glass entrance will include the signature Coast Guard exhibit of a helicopter with a suspended rescue swimmer.

- **Waterfront Elevation**

The design of the museum has been understated when viewed from the City and more interactive when viewed from the water. This led to expanses of glass and transparency along the riverfront. In response to feedback received, the design has moved to a quieter, more sculptural expression that is defined by a pattern of repeated curved “sail” elements. This new approach allows the building to be transparent with vast expanses of glass near the train station, and then more opaque and restrained along the water’s edge so that the building can more naturally fit in with the New London skyline and riverfront.

- **Parade Plaza Elevation**

The attitude of the building as it faces the train station and Parade Plaza has similarly been studied and updated over the course of the design evolution. Most notably, the design incorporates a section of the pedestrian connector that cuts through the building providing continued views of Parade Plaza and the train station along the length of its eastern elevation.

Following discussions with the SHPO, the general approach of the façade is to keep it neutral and preserve the idea of a backdrop for the train station. With the extensive transparency of entrance on the southeastern corner and the views into the pedestrian connector, the building addresses the urban context without overshadowing the train station. The intent is to keep the rest of the façade neutral and suppress the expression of other elements such as windows or other articulations.

Architecturally, it is understood that any new construction within the New London historic district will have an impact. The museum will be larger than its immediate neighbors, but its size has been reduced in response to this context. The goal is that this design will respond to the historic fabric and, within the constraints imposed by the site, be a respectful and reserved neighbor. From Parade Plaza, the building has a recessive posture. From the waterfront, the design is more textured, but more subdued than previous design concepts. The waterfront view is designed to work in conjunction with the view to the train station so that new and old are seen in partnership with one another.

This approach to the design is consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties which strive to preserve historic assets and ensure that new interventions remain distinct rather than copy traditional designs. The Standards are set to help instruct how new construction can be incorporated as a modification to a historic building or within a historic district, such as New London. Seen through the lens of the Standards, the museum design employs a modern architectural language so will not be confused with the City’s historic architectural fabric. The site is also at the northern tip of the historic district, so with the careful planning of its relationship to the train station, the museum obscures very little of the City’s historic skyline.

Even with the level of attention, and the hope that the project will bring significant benefit to the city through its operation, design efforts reflect additional measures that “mitigate” or compensate for unavoidable impacts. In many cases, development projects might document historic structures that are to be demolished, but that is not applicable in this instance. The pedestrian connector, however, provides an opportunity to convey the story of New London’s past. Projecting curated panels on the north face of the pedestrian connector walls, the historic context can be explained as visitors are experiencing the panoramic view of the business district on the south facing glass of the connector. “

3. *Parking/Traffic* – Members of the public expressed concern relative to lack of parking in downtown New London available to future museum visitors.

Response: As reported in SEA Section 3.14 (Affected Environment), 4.14 (Environmental Consequences) and 4.16 (Cumulative Impacts), approximately 325 parked vehicles generated by the NCGM would need to be accommodated within New London’s downtown supply of parking during museum peak times. The SEA made use of peak summer parking demand data and analysis as presented in the *New London Downtown Transportation and Parking Study* (Milone & MacBroom, Inc., 2017). This assessment relied on data that was current at that time. The following additional narrative has been added to Section 4.16.2 of the FSEA:

“As of the summer of 2016, the peak utilization rate of parking in downtown New London during the peak timeframe on Saturday afternoon was 74%. Factoring in future parking demand estimates attributable to (1) the NCGM; (2) ridership growth at nearby ferry operations; (3) lost parking at the NCGM site historically used by Cross Sound Ferry; (4) reoccupancy of vacant downtown building space; and (5) ridership growth from Shore Line East, Amtrak and Greyhound, existing parking supply could be over capacity during peak periods in the future. The City has recognized that parking in downtown New London will be challenging, even without the NCGM.”

According to the New London Parking Authority, for the past several years has been actively engaged in the analysis and management of parking in the City of New London’s downtown area in an effort to maximize efficiency and stabilize demand in peak parking periods. As a part of the assessment process, in 2016 the City retained consulting services to evaluate traffic and parking in downtown New London. As part of the effort, data was collected on the availability of parking, as well as current and future parking demand. This work was undertaken with the understanding that the proposed National Coast Guard Museum project would have a parking demand of 325 spaces. With the results of the analysis, actions were taken by Parking Authority to ease the parking burden in the downtown New London waterfront area, resulting in at least 350 spaces being freed up as well as the following:

- In 2016, the O’Neil-Tilley parking lots were out of service for refurbishing. These lots are now open to the public, providing approximately 201 spaces.
- In 2017, the Parking Authority embarked on a program to remove derelict vehicles in the Water Street Parking Garage. This effort resulted in approximately 50 vehicles being removed, thus freeing up those spaces within the parking facility.
- General Dynamics Electric Boat (EB) employs approximately three thousand five hundred (3,500) people in their New London location on Pequot Avenue. In an Agreement dated May 29, 2015 250) unreserved parking spaces in the Water Street Garage were leased to EB. Winter 2016, another 300 or more unreserved parking spaces were contracted by EB. Since that time, the Parking Authority has been working with EB to incentivize its employees through discounted rates to park closer to the Pequot Avenue facility, primarily via on-street parking in the Fort Trumbull area. This effort has resulted in a 50% reduction in EB employee use of the Water Street Parking Garage, to approximately 300 spaces. Moreover, the Parking Authority continues to collaborate with EB to further reduce their employee parking population in the Water Street Garage by utilizing newly acquired properties in Ft. Trumbull for commercial public parking.
- The Parking Authority is seeking to expand the Water Street Parking Garage, which would add approximately 350 spaces. Other measures currently being explored include increasing public accessibility of private parking; improvements to the operation and management of downtown public parking system; and fostering increasing use of non-automobile transportation. In the future, the Parking Authority will be seeking additional parking improvement measures as current vacant downtown buildings are redeveloped.

- Finally, a Maryland-based real estate investment firm in October 2018 unveiled its plan for development in Fort Trumbull that will feature a mixed use parking garage. The parking garage is anticipated to provide further relief to the parking demand in downtown New London.

In light of the above, the USCG that the NCGM will have minimal impact on parking in the downtown New London area and that adequate parking will be available. A letter dated November 1, 2018 from the New London Parking Authority supporting this determination is included in FSEA Appendix A.”

4. Pedestrian Bridge – Members of the public commented on the need for and cost of the proposed pedestrian bridge. Some of these comments were in the context of the lack of need for such a structure were the museum located at Fort Trumbull. One commenter indicated that the walkway would be an eyesore. Another member of the public urged that the bridge not be constructed over Water Street such that visitors would not be discouraged to spend time in the downtown area visiting local merchants.

Response: It is noted that the pedestrian bridge is a separate but related project and not part of the USCG proposed action. This structure is discussed in SEA Section 4.16.1 under the cumulative impact analysis. The pedestrian bridge underwent separate environmental review under the Connecticut Environmental Policy Act (CEPA) and is currently undergoing Section 106 consultation as part of the NCGM consultation with SHPO. The structure would be funded, in whole or in part, by the State of Connecticut via the Department of Economic and Community Development (DECD) and would be constructed by the National Coast Guard Museum Association (NCGMA). Neither federal nor local New London taxpayer dollars will be used for its construction.

The purpose of the pedestrian bridge is to provide a safe accessible connection between the proposed NCGM, the adjacent multimodal transportation hubs, parking, and area attractions and businesses along New London’s downtown waterfront area. Existing obstacles to pedestrian safety include vehicular traffic (including passenger, bus, and taxi) and rail traffic. Given the concentration of people, activities, and moving train and roadway traffic, there is a need for an overpass that will allow pedestrians to safely access and navigate the downtown area (CEPA EIE, July 2014). The pedestrian bridge will have dropdown points on the eastern side of Water Street to serve the train station and on the water side of the active rail line. The two existing railroad crossings occur at-grade and require pedestrians to physically walk across the active tracks.

In response to early consultations with SHPO, the pedestrian bridge design is sensitive in how the new structures would interact with Union Station and the downtown area around Parade Plaza. First, the pedestrian bridge would run in a curve that swings to the north, staying as far away from the train station as possible. This curved path of the bridge would define the northeast edge of Parade Plaza, preserving the sense of the outdoor “room” of open space that is flanked by the parking garage on the north and anchored by the train station’s front elevation on the east. The bridge would also provide a prominent view into the downtown New London business district and an unencumbered view of the train station from three sides. No changes have been made in the FSEA on this topic.

5. Public Process – A number of individuals expressed dismay that their comments would not be considered or heeded and/or that public feedback would not be made available once it is received.

Response: As documented in the 2014 EA and the 2018 Draft SEA, public involvement has been integral to the NEPA review process through public notification, individual and public meetings, and availability of draft and final documents. Refer to FSEA Sections 1.5 and 7.1 through 7.5. The design of the NCGM has undergone significant changes that were a direct result of public and agency comment. Refer to the response to item #2 above. The FSEA will include copies of all public comment received and the document will be made available to the public.

6. Regulatory Requirements – One member of the public commented that (1) the SEA is procedurally noncompliant with NEPA; (2) that the site was pre-selected; (3) that statements in the Draft SEA are purely

subjective; (4) that the museum would be illegally located on the waterfront; and (5) that Congress did not establish a specific purpose and need for the facility.

Response: Both the 2014 EA and the 2018 Draft SEA have been undertaken in conformance with NEPA regulations and USCG guidance documents. This process is documented in the Draft and Final SEA. The SEA outlines the measures that were taken to comply with NEPA as well as the process for site selection, consistent with the statutory authorization. As presented in the SEA Section 1.1, the initial 0.34 acres of land was donated by the City of New London in 2014. As such, the SEA only modifies the site that was already selected. Data is presented in the SEA to support the statements made therein. The NCGM will seek all required approvals and permits prior to its construction, including a federal coastal consistency determination. Finally, the establishment of the NCGM was authorized by Congress. Federal actions of the nature described in the SEA do not require a further act of Congress.

7. Shoreline Fill – One member of the public noted that acquisition of land that is submerged under water will be unusable.

Response: As presented in the SEA Section 2.3, the proposed action includes the placement of fill on top of land that is currently submerged under water. While this fill will not be used as structural support for the NCGM structure, it will support at-grade public access to both the museum and the waterfront and will eliminate the potential for watercraft to gain access beneath the museum, a security requirement for federal buildings. An approximately 3,100-square-foot area of City Pier Plaza promenade would be removed to provide open water in recognition that approximately the same area of currently open water would be filled to support the development of the NCGM. As noted in the SEA, necessary authorization for the intended action will be sought from the authorities having jurisdiction, including the City of New London, CT DEEP, and the Army Corps of Engineers.

8. Cost – Several commenting public members identified a high cost associated with the NCGM.

Response: As presented in the SEA, the NCGM would be constructed using private funds raised by the NCGMA. The USCG would bear the cost of the museum exhibits with federal funds to the extent appropriated and the intent is for the CG to own and operate the museum. The separate but related pedestrian bridge would be constructed using State dollars through the CT DECD. Following construction, the intent is that the City of New London will take over ownership, operation, and maintenance of the pedestrian bridge. That intent is documented in a Memorandum of Agreement dated February 19, 2014 among the NCGMA, the USCG, the City of New London, and the State of Connecticut.

9. Construction Related Impacts – At least one member of the public commented on the disruption of downtown businesses during construction that could take several years to complete. Specific topics of concern included slowed traffic, parking challenges, dug up streets, dust, and noise.

Response: Construction impacts have been extensively evaluated in the SEA and appropriate measures have been included in the proposed action that would minimize construction related impacts. These include off-site staging areas, the use of river access, and designation of dedicated vehicular access plans. As stated in the Draft SEA, a Maintenance and Protection of Traffic Plan would be developed prior to construction. Refer to SEA Sections 2.3. (Proposed Action), 2.4 (Best Management Practices and Project-Incorporated Protection Measures, 4.3 (Air Quality), and 4.4 (Noise).

APPENDIX A11
POST-COMMENT PERIOD CORRESPONDENCE



November 1, 2018

Richard J. Grahn, Esq., President/CEO
National Coast Guard Museum Association, Inc.
78 Howard Street, Suite A
New London, CT 06320

**RE: National Coast Guard Museum/Pedestrian Access Project
City of New London, Connecticut**

Dear Mr. Grahn:

The New London Parking Authority ("Parking Authority") for the past several years has been actively engaged in the analysis and management of parking in the City of New London's ("City") downtown area in an effort to maximize efficiency and stabilize demand in peak parking periods. As a part of the assessment process, in 2016 the City retained consulting services to evaluate traffic and parking in downtown New London. As part of the effort, data was collected on the availability of parking, as well as current and future parking demand. This work was undertaken with the understanding that the proposed National Coast Guard Museum project would have a parking demand of three hundred twenty-five (325) spaces. With the results of the analysis actions were taken by Parking Authority to ease the parking burden in the downtown New London waterfront area, resulting in at least three hundred fifty (350) spaces being freed up as well as the following:

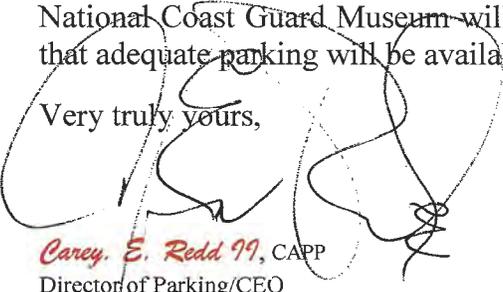
- In 2016, the O'Neil-Tilley parking lots were out of service for refurbishing. These lots are now open to the public, providing approximately two hundred one (201) parking spaces.
- In 2017, the Parking Authority embarked on a program to remove derelict vehicles in the Water Street Parking Garage. This effort resulted in approximately fifty (50) vehicles being removed, thus freeing up those spaces within the parking facility.
- General Dynamics Electric Boat (EB) employs approximately three thousand five hundred (3,500) people in their New London location on Pequot Avenue. In an Agreement dated May 29, 2015 two hundred and fifty (250) unreserved parking spaces in the Water Street Garage were leased to EB. Winter 2016, another three hundred plus (300+) unreserved parking spaces were contracted by EB. Since that time, the Parking Authority has been working with EB to incentivize its employees through discounted rates to park closer to the Pequot Avenue facility, primarily via on-street parking in the Fort Trumbull area. This effort has resulted in a 50% reduction in EB employee use of the Water Street Parking Garage, to approximately three hundred (300) spaces. Moreover, the Parking Authority continues to collaborate with EB to further reduce their employee parking population in the Water Street Garage by utilizing newly acquired properties in Ft. Trumbull for commercial public parking.



- The Parking Authority is seeking to expand the Water Street Parking Garage, which would add approximately three hundred and fifty (350) parking spaces. Other measures currently being explored include increasing public accessibility of private parking; improvements to the operation and management of downtown public parking system; and fostering increasing use of non-automobile transportation. In the future, the Parking Authority will be seeking additional parking improvement measures as current vacant downtown buildings are redeveloped.
- Finally, a Maryland-based real estate investment firm several weeks ago unveiled its plan for development in Fort Trumbull that will feature a mixed use parking garage. The parking garage is anticipated to provide further relief to the parking demand in downtown New London.

Given the recent efforts undertaken by the New London Parking Authority, as well as ongoing efforts and planned improvements moving forward, it is the Parking Authority's opine that the National Coast Guard Museum will have minimal impact on parking in the downtown area and that adequate parking will be available.

Very truly yours,



Carey E. Redd 99, CAPP
Director of Parking/CEO
New London Parking



City of New London

Office of the Mayor

181 State Street • New London, CT 06320 • Phone (860) 447-5201 • Fax (860) 447-7971

October 31, 2018

Richard J. Grahn, Esq., President/CEO
National Coast Guard Museum Association, Inc.
78 Howard Street, Suite A
New London, CT 06320

**RE: National Coast Guard Museum/Pedestrian Access Project
City of New London, New London County, Connecticut**

Dear Mr. Grahn:

This letter is intended to express the City's favorable position regarding the proposed National Coast Guard Museum and the related public access improvements as outlined in the draft Supplemental Environmental Analysis published on August 2, 2018. I want to acknowledge that over the past two years, presentations have been made by the Museum Association to the Mayor, the City Council, city planners, and the public regarding the proposed museum design and public access improvements to the site all in accordance with the February 19, 2014 Memorandum of Agreement among the National Coast Guard Museum Association, Inc. (NCGMA), the United States Coast Guard (USCG), the City of New London, and the State of Connecticut.

As a result of those presentations, we understand that the work is envisioned to proceed in stages with which we support, consisting of:

- a. consolidated design, permitting, and possible land transfers for the museum, bulkhead and fill, and the public access features of the project, including an elevated pedestrian walkway to safely deliver patrons from the city owned parking garage, across Water Street, to the AMTRAK platform, the museum, Cross Sound Ferry and the waterfront, as well as to return those patrons to engage with businesses in downtown New London;
- b. site work for the public access improvements, including opening access to the river by removing a portion of the City Pier Plaza for creation of possible public water attractions, as well as creation of an arc of bulkhead from City Pier to the property of Cross Sound Ferry to the north and adding an approximately equivalent amount of fill to provide appropriate shoreline stabilization for the project, reconfiguring the existing retaining wall, emergency siren, and utility services to maintain and improve the emergency access along the railroad right of way, and removing a portion of the floating docks during construction. We concur with the view that construction of these public access improvements should occur first and be timed so as to minimize to the fullest extent possible disruption of the traditional activities on the waterfront;

- c. site work for the museum consisting of foundation pilings and storm water retention facilities;
- d. site work for the pedestrian bridge to be coordinated with AMTRAK and the City of New London;
- e. commencement of coordinated construction of the museum and public access walkway; and
- f. no additional request for City funding.

While the City has not yet been asked to formally authorize all of the activities as outlined above, and cannot do so until final designs, permits, and other authorizations, including those required from the City Council, have been obtained, I am pleased to report that the City endorses the project as proposed and requests that the development team proceed with the final design for our review and permitting in the manner proposed.

Very truly yours,



Michael E. Passero
Mayor

January 18, 2018

Note: The date of this correspondence is incorrectly listed as January 18, 2018. The actual date was January 18, 2019.

Mr. Dean Amundson
Environmental Planning
United States Coast Guard
1301 Clay Street, Suite 700N
Oakland, CA 94612-5203

Subject: Supplemental Environmental Assessment
United States Coast Guard Museum
New London, Connecticut

Dear Mr. Amundson,

The United States Coast Guard (USCG) will be acquiring land and allowing the United States Coast Guard Museum Association, Inc. (USCGMA) to construct an approximately 80,000 square foot museum on the parcel, which subsequently will be donated to the USCG upon completion. As a result of the proposed actions, the USCG has taken a streamlined approach to the project by integrating the requirements of the National Environmental Policy Act with Section 106, the implementing regulations of the National Historic Preservation Act, (36 CFR 800). The USCG initiated consultation with the Connecticut State Historic Preservation Office (SHPO) during 2014 regarding the above-referenced undertaking. Since that time, the museum designs and requirements have been refined and have been presented to the public in the Supplemental Environmental Assessment (SEA) dated July 2018. SHPO has reviewed this document, understands the purpose and need of the project, and offers no objection to the proposed preferred build alternative. This office recognizes that consultation is ongoing and offers the following comments and corrections to the SEA:

- Section 3.9, page 3-18, update the legal reference for compliance with the National Historic Preservation Act from 16 USC 470f to its new location 54 USC 306108.
- Section 3.9.2, page 3-19, states that different Areas of Potential Effect (APE) were developed, but there is no information as to how they were developed or what they encompass. Specifically, does the archaeological APE take into consideration proposed temporary or permanent utility corridors? What is the extent of the APE for aboveground resources? The SEA states that both direct and indirect effects of the proposed museum were taken into account, but there is no explanation of either APE or methods employed to determine the APE. Please elaborate on the development and actual extent of all APEs used for analysis.

State Historic Preservation Office

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- Section 3.9.2, page 3-19, references Section 106 correspondence with SHPO regarding the APEs, but the appendix does not contain such correspondence. Please correct the incongruence.
- Section 3.9.2, page 3-19, SHPO is concerned about the summary of relevant National Properties being taken into consideration. First, the Downtown New London Historic District is in the National Register Information System (NRIS) as resource #79002665. The SEA refers to it as NRIS #88000070, which is a nomination for a boundary increase to the district. SHPO does not know if the author considered both properties in the discussion or if it only represents one portion of the district.
- Section 3.9.2, page 3-19, states that, “a detailed evaluation of potential effects on historic resources was not performed” for the laydown areas. SHPO request information as to whether or not **any** analysis had been completed for the laydown areas. If so, SHPO requests that this information be presented, at a minimum in the form of a table. SHPO does not have adequate information to concur with recommendations regarding the laydown areas at this time. SHPO also recognizes that as construction plans change, the laydown areas may need to be adjusted. An appropriate summary now can facilitate any review of future changes so that there are no impacts to the construction schedule. This comment is repeated for Section 4.9.2, page 4-23.
- Section 3.9.2, page 3-19, Figure 3.9.-1 is described as showing “noteworthy historical architectural resources.” Please explain the criteria used to define something as noteworthy?
- Section 3.9.2, pages 3-21 to 3-22, only discuss four of the National Register listed properties located in the vicinity of the project parcel. There is no explanation as to why only these four properties and not all properties are included in this discussion or depicted in the referenced figure. SHPO records indicate that there are at least 10 National Register Properties, including two districts, which also should be depicted on Figure 3.9-1. Many of the missing properties are in closer proximity than ones given consideration for analysis. Please provide an explanation for why all historic properties were not considered. In particular, why was the individually listed New London Railroad Station, the source of all consultation with SHPO, **not** given special consideration? SHPO is deeply concerned about the lack of detail, understanding, and consideration given to National Register listed properties that may be impacted by the proposed museum. Was an architectural survey or any relevant architectural fieldwork completed as part of the analysis? Are there any properties not listed, but eligible for listing with the APE for the undertaking?

- Section 3.9.2, pages 3-22 through 25, while SHPO appreciates the cartographic analysis and consideration of previous cultural resources investigations, known archeological sites are not included in the discussion. As with the discussed prior investigations, this information should be used to inform any management decisions. Were previously reported archaeological sites taken into consideration? SHPO records indicate that there are 10 archeological sites reported within ½ mile of the proposed museum location. When compared to other locations in the state, this is a considerable amount of information and should be used to inform management decisions.
- Section 4.9.2, page 4-19, please change the opening sentence from “will diminish” to “has the potential to diminish.” Because not all design choices have been made and not all historic properties were taken into consideration, SHPO does not have information to support such a definitive statement.
- Section 4.9.2, page 4-19, it may be important to clarify that the language being used for evaluation of the proposed action alternative is relative to the National Historic Preservation Act. It is likely that the proposed action will have no significant impact pursuant to the National Environmental Policy Act.
- Section 4.9.2, page 4-19, Table 4.9-1, what are the record numbers referenced after the property name in the table? If a record number is to be included, please use the standard National Register Information System number. Also, please refer to prior comments regarding the singular consideration of these four historic properties.
- Section 4.9.2, page 4-19, Table 4.9-1, are the listed “character-defining feature(s)” described in the National Register nomination as character defining features? Or, are these listed impacts referencing diminished aspects of integrity? Please refer to 36 CFR 800.5 and explain.
- Section 4.9.2, page 4-19, Table 4.9-1, to SHPO’s knowledge, no determination of effect has been made because the potential exists for continued design changes. In addition, and elaborated upon below, SHPO has concerns regarding the determination of effects presented in the SEA.
- Section 4.9.2, page 4-19, the description presented for the New London Downtown Historic District appears to be from the nomination for a boundary increase to the district. Was the entire district taken into consideration because the boundary descriptions do not appear to match SHPO files? In addition, the last two sentences of the first paragraph describe coming down Broad Street. It would appear that the reference is actually to State Street. Please clarify or correct.

- Section 4.9.2, pages 4-19 and 4-20, the proposed museum is located outside the northeastern boundary of the Downtown New London Historic District. The historic setting at this location quickly gives way to modern development. This should be taken into consideration when discussing potential effects.
- Section 4.9.2, pages 4-19 to 4-23, while SHPO acknowledges that the proposed museum will have a visual effect on adjacent historic properties, SHPO does not agree that the presented arguments for an adverse effect have been established or are appropriate relative to information provided in the National Register nomination. Simply being visible from a historic property does not qualify as an adverse effect. Again, please refer to 36 CFR 800.5.
- Section 4.9.2, pages 4-22 and 4-23, as noted in the SEA, design choices are still to be decided before assessments can be made regarding the compatibility of design. This discussion has been ongoing and SHPO looks forward to additional discussions regarding design decisions to minimize impacts to historic resources, especially the New London Railroad Station, a property individually listed on the National Register of Historic Places and situated immediately adjacent to the proposed project parcel.
- Section 4.16.1, pages 4-41 and 4-42, SHPO appreciates the brief discussion and analysis of future related projects. This office primarily has been concerned with the pedestrian overpass project. During prior consultation, SHPO requested that the overpass be moved as far north as possible to give space to the New London Railroad Station, that the overpass should have as few support pillars as possible, and that the construction materials and design choices should be sympathetic to the New London Railroad Station. SHPO supports the configuration depicted in the SEA, but understands that final design decisions remain outstanding. Again, SHPO looks forward to additional consultation regarding these design decisions to minimize impacts to historic resources

SHPO appreciates USCG, and the USCGMA on their behalf, to streamline the NEPA and Section 106 processes; however, the documentation provided in the SEA does not satisfy the requirements of Section 106. To date, SHPO consultation only has been conducted through telephone or in-person meetings. Because this office is discouraged by 1) the conflicting findings of effect throughout the document, 2) an inaccurate discussion of historic properties that may be impacted, 3) an apparent misunderstanding of how to apply the criteria of adverse effect (36 CFR 800.5), or 4) specific analysis of ancillary facilities; we request a formal cultural resources management report pursuant to Section 106. The report should be a professionally written technical document that demonstrates knowledge and understanding of the cultural environment, consideration of previously completed investigations, identification of listed and eligible



resources that may be impacted by the project, a detailed analysis of the effects of the project on the identified cultural resources, methods employed, and comprehensive management recommendations. However, based on our discussions and knowledge of the project as presented in the SEA, SHPO anticipates that for the purposes of the National Environmental Policy Act, there will be no significant impacts to historic resources.

SHPO appreciates the opportunity to review and comment upon this project and our office looks forward to additional consultation as the project moves forward. For additional information, please contact me at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Catherine Labadia".

Catherine Labadia
Deputy State Historic Preservation Officer

cc (via email): Pulver, NCGMA
Saunders, Historical Perspectives

APPENDIX B

Coastal Consistency Determination

Appendix B1 – Coastal Management Consistency Review Form
for Federal Action

Appendix B2 – CT DEEP Concurrence Determination

APPENDIX B1
COASTAL MANAGEMENT CONSISTENCY REVIEW FORM FOR FEDERAL
ACTION



Connecticut Department of
Energy & Environmental Protection
Bureau of Water Protection & Land Reuse
Office of Long Island Sound Programs

Coastal Management Consistency Review Form for Federal Activities

Use of this form, although not mandatory, will facilitate coastal consistency review analysis by the Federal agency and result in submission of sufficient information for comprehensive review by the Department of Energy and Environmental Protection (DEEP) Office of Long Island Sound Programs (OLISP). It is anticipated that submittal of a completed form with indicated supplemental materials will, in most instances, eliminate the need for further information. The form should be used in conjunction with the *Reference Guide to Coastal Policies and Definitions* (DEEP-OLISP-GUID-200). The *Instructions and Guidance for Completing the Federal Coastal Consistency Review Form for Federal Activities* (DEEP-OLISP-INST-300) explains how to complete this form and provides several critical definitions and pertinent guidance. Once completed, please submit this form with the appropriate supporting documentation to: CT DEEP-OLISP, 79 Elm Street, Hartford, CT 06106-5127. For further information or assistance in completing this form, please contact us at the address above or by phone at 860-424-3034.

Part I: Federal Agency and Contact Identification

Agency Name: United States Coast Guard	
Mailing Address: 1301 Clay Street; Suite 700N	
City/Town: Oakland	State: CA Zip Code: 94612-5203
Business Phone: (510) 637-5541	ext. N/A Fax: (510)637-5500
Agency Contact: Dean Amundson	Title: Env. Planning Program Manager
E-Mail: Dean.J.Amundson@uscg.mil	
Identification of Primary Contact for correspondence if other than Agency Contact noted above:	
Company Name: Milone & MacBroom, Inc.	
Mailing Address: 99 Realty Drive	
City/Town: Cheshire	State: CT Zip Code: 06410
Business Phone: 203.271.1773	ext. 250 Fax: (203) 272-9733
Contact Person: Megan B. Raymond	Title: Lead Environmental Scientist
E-Mail: MRaymond@mminc.com	

Part II: Review Type and Project Title

Type of Review (check one):
<input checked="" type="checkbox"/> Federal Development Project <input type="checkbox"/> Negative Determination
<input type="checkbox"/> Other Federal agency activity (specify general type):
Project Title or Other Identification:
National Coast Guard Museum

Part III: Other DEEP Involvement with the Project

Is any component of this activity directly regulated by DEEP separate from the Federal Coastal Consistency Process (e.g., 401 Water Quality Certification)? Yes No

If yes, list below all DEEP permits, certifications, or other authorizations being pursued for this activity, and describe the regulated activity/ies:

Natural Diversity Database (NDDB) State Listed Species Review

Check if additional sheets are attached to this page

Has any other unit of the DEEP been contacted regarding this activity? Yes No

If yes, please identify other Departmental contacts:

Bureau of Natural Resources Wildlife Division

Check if additional sheets are attached to this page

Part IV: Detailed Project Information

1. Description of Proposed Activity

Describe the proposed federal activity including its purpose and all related actions. For site-specific activities, such actions might include: site clearing, grading, demolition, and other site preparations; percentage of increase or decrease in impervious cover from existing conditions resulting from the activity; phasing, timing, and method of proposed construction; and new uses and changes from existing uses. For site-specific activities proposed at waterfront sites, provide detailed information regarding any water-dependent uses proposed. For non-site specific activities, include a complete description of the proposed activity and its purpose.

The U.S. Coast Guard (USCG or Coast Guard) is proposing to allow the National Coast Guard Museum Association (NCGMA) to construct an approximately 80,000 square-foot museum on a 0.34-acre site in downtown New London, Connecticut on land owned by the Coast Guard. The proposed federal action, as described in the 2014 Environmental Assessment (EA) under the National Environmental Policy Act (NEPA), consisted of USCG acquisition, by gift, of a 0.34-acre parcel of land on Water Street in downtown New London, allowing the National Coast Guard Museum Association (NCGMA) to construct a museum on the acquired property, and potential acquisition and long-term operation of the museum by the U.S. Coast Guard (USCG).

The USCG acquired the 0.34-acre parcel from the city of New London in 2014. At that time, a Coastal Consistency Review application was submitted to CT DEEP but was not acted upon. Changes to the proposed action as evaluated in the 2018 Supplemental Environmental Assessment (SEA) include the acquisition of additional land as well as changes to the museum design that affect its size, footprint, related in-water activities, and the overall relationship of the building to the surrounding area. Since construction of a museum and shoreline improvements will be an indirect effect of the proposed Coast Guard actions, the potential impacts of such construction and long-term operation are evaluated herein.

Check if additional sheets are attached to this page

Part IV: Detailed Project Information (cont.)

2. Is the Project Site-Specific?

- Yes Please continue with Part IV and fill out all subsequent parts of the form.
- No Skip to Part V: Identification of Applicable Enforceable Policies

3. Location Information

a. Project Address, Location, or Affected Area: **Water Street near Union Station**

City/Town: **New London** State: **CT** Zip Code: **06320**

b. Agency's interest in property, if any:

- fee simple
- option
- lessee
- easement
- not applicable
- other (specify): **Property Owner**

c. Is the activity proposed at a waterfront site (includes tidal wetlands frontage) or within coastal, tidal or navigable waters? Yes No

If yes, name the affected coastal, tidal or navigable waters:

Thames River

d. If off-site effects on coastal uses and/or resources are anticipated, identify the address or location(s) of such effects and attach a map (8 1/2" x 11" format) indicating this area:

N/A

Check if additional sheets are attached to this page

Check here to indicate map is enclosed.

e. If the Federal project is site specific, identify and describe the existing land use on and adjacent to the site of the proposed activity and any anticipated location(s) of off-site effects on coastal resources or uses. Clearly differentiate between the descriptions of on-site and off-site areas. Include any existing structures and significant features at either location.

The project site is currently an existing compacted gravel parking lot, and the northern portion of the pile-supported City Pier Plaza. City Pier Plaza is a public pier that provides waterfront access with no other amenities. Adjacent to the site is Union Railroad Station.

Check if additional sheets are attached to this page

f. Indicate the area of the project site: **0.34** acres or square feet

g. Indicate the area of any anticipated off-site effects: **N/A**

acres or square feet or other units (specify units):

Part IV: Detailed Project Information (cont.)

4. Project Plans

If the proposed Federal activity is a "Federal Development Project", or other site specific activity, please provide project plans in 8 ½" x 11" format that clearly and accurately depict the following items, and check the appropriate boxes to indicate that the information is included in this review package:

- Project location
- Existing and proposed conditions, including buildings and grading
- Coastal resources on and contiguous to the site
- High Tide Line [as defined in CGS § 22a-359(c)], Mean High Water, and Mean Low Water elevations and contours (for parcels abutting coastal waters and/or tidal wetlands only)
- Soil erosion and sediment controls
- Stormwater management measures
- Ownership and type of use on adjacent properties
- Reference datum (i.e., National Geodetic Vertical Datum, Mean Sea Level, etc.)

If a Spill Prevention, Control, and Containment Plan (SPCC) has been developed for this site, please provide a copy in the review package and check here to indicate its inclusion

Part V: Identification of the Applicable Enforceable Policies

In this Part, there are four tables which should be completed by checking the appropriate boxes in each. Table 1: *Coastal Resources and Associated Enforceable Policies*, is to identify on-site, adjacent, and/or potentially affected State-statutorily defined coastal resources. Table 2: *Coastal Uses and Associated Enforceable Policies*, is to identify existing and proposed State-statutorily defined coastal uses potentially affected by the project. Table 3a: *Potential Adverse Impacts on Coastal Resources* and Table 3b: *Potential Adverse Impacts on Water-dependent Uses and Opportunities* is to identify State-statutorily-defined adverse impacts.

Table 1

Coastal Resources and Associated Enforceable Policies	On-site	Adjacent	Affected by the proposed Federal activity**
General Coastal Resources* - Definition: CGS § 22a-93(7) Policy: CGS § 22a-92(a)(2)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Beaches & Dunes - Definition: CGS § 22a-93(7)(C) Policies: CGS §§ 22a-92(b)(2)(C) and 22a-92(c)(1)(K)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bluffs & Escarpments - Definition: CGS § 22a-93(7)(A) Policy: CGS § 22a-92(b)(2)(A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Hazard Area - Definition: CGS § 22a-93(7)(H); Policies: CGS §§ 22a-92(a)(2), 22a-92(a)(5), 22a-92(b)(2)(F), 22a-92(b)(2)(J), 22a-92(c)(1)(K), and 22a-92(c)(2)(B)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Coastal Waters, Estuarine Embayments, Nearshore Waters, Offshore Waters - Definitions: CGS §§ 22a-93(5), 22a-93(7)(G), 22a-93(7)(K), and 22a-93(7)(L); Policies: CGS §§ 22a-92(a)(2) and 22a-92(c)(2)(A)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Developed Shorefront - Definition: CGS § 22a-93(7)(I); Policy: CGS § 22a-92(b)(2)(G)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Freshwater Wetlands and Watercourses - Definition: CGS § 22a-93(7)(F) Policy: CGS § 22a-92(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Intertidal Flats - Definition: CGS § 22a-93(7)(D) Policies: CGS § 22a-92(b)(2)(D) and 22a-92(c)(1)(K)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Islands - Definition: CGS § 22a-93(7)(J) Policy: CGS § 22a-92(b)(2)(H)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rocky Shorefront - Definition: CGS § 22a-93(7)(B) Policy: CGS § 22a-92(b)(2)(B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shellfish Concentration Areas - Definition: CGS § 22a-93(7)(N) Policy: CGS § 22a-92(c)(1)(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Shorelands - Definition: CGS § 22a-93(7)(M) Policy: CGS § 22a-92(b)(2)(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tidal Wetlands - Definition: CGS § 22a-93(7)(E) Policies: CGS §§ 22a-92(a)(2), 22a-92(b)(2)(E), and 22a-92(c)(1)(B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* The General Coastal Resource Policy is applicable to all proposed activities within Connecticut's coastal boundary and coastal area.

** The coastal resources affected by the project can be on-site, adjacent, or further removed from the project site.

Table 2

Coastal Uses and Associated Enforceable Policies	
<input checked="" type="checkbox"/>	General Development* - CGS §§ 22a-92(a)(1), 22a-92(a)(4), and 22a-92(a)(9)
<input type="checkbox"/>	Boating - CGS § 22a-92(b)(1)(G), 22a-92(b)(1)(H), and 22a-92(b)(1)(I)
<input checked="" type="checkbox"/>	Coastal Recreation and Access - CGS §§ 22a-92(a)(2), 22a-92(a)(6), 22a-92(c)(1)(J), and 22a-92(c)(1)(K)
<input checked="" type="checkbox"/>	Coastal Structures and Filling - CGS § 22a-92(a)(2), 22a-92(b)(1)(D), 22a-92(c)(1)(B), 22a-92(c)(1)(K), and 22a-92(c)(2)(B)
<input checked="" type="checkbox"/>	Cultural Resources – CGS § 22a-92(b)(1)(J)
<input type="checkbox"/>	Dams, Dikes and Reservoirs - CGS § 22a-92(a)(2)
<input type="checkbox"/>	Dredging and Navigation - CGS §§ 22a-92(a)(2), 22a-92(c)(1)(C), 22a-92(c)(1)(D), and 22a-92(c)(1)(E)
<input type="checkbox"/>	Energy Facilities - CGS §§ 16-50g and 16-50p(a)
<input checked="" type="checkbox"/>	Fisheries - CGS § 22a-92(c)(1)(I)
<input type="checkbox"/>	Flooding and Erosion - CGS § 22a-92(a)(5)
<input type="checkbox"/>	Fuel, Chemicals and Hazardous Materials - CGS §§ 22a-92(a)(2), 22a-92(b)(1)(C), 22a-92(b)(1)(E) and 22a-92(c)(1)(A)
<input type="checkbox"/>	Facilities and Resources which are in the National Interest - Definition CGS § 22a-93(14) - Policy CGS 22a-92(a)(10)
<input type="checkbox"/>	Intergovernmental Coordination - CGS § 22a-92(a)(9)
<input type="checkbox"/>	Open Space and Agricultural Lands - CGS § 22a-92(a)(2)
<input type="checkbox"/>	Ports and Harbors – CGS § 22a-92(b)(1)(C)
<input type="checkbox"/>	Sewer and Water Lines - CGS § 22a-92(b)(1)(B)
<input type="checkbox"/>	Solid Waste - CGS § 22a-92(a)(2)
<input checked="" type="checkbox"/>	Transportation - CGS §§ 22a-92(b)(1)(F), 22a-92(c)(1)(F), 22a-92(c)(1)(G), and 22a-92(c)(1)(H)
<input checked="" type="checkbox"/>	Water-dependent Uses** - Definition CGS § 22a-93(16) - Policies CGS §§ 22a-92(a)(3) and 22a-92(b)(1)(A)

* The General Development Policy is applicable to all proposed activities within Connecticut's coastal boundary and coastal area.

** The Water-Dependent Uses Policies are applicable to all activities proposed at waterfront sites, including those sites with only tidal wetlands frontage.

Identification of State Statutorily Defined Potential Adverse Impacts

In Tables 3a and 3b, identify the adverse impact categories that apply to the proposed Federal activity. The "Applicable" column **must be checked** if the proposed activity has the **potential** to generate any of the State-statutorily defined adverse impacts, even if the activity is designed to avoid such impacts. Also indicate, by checking the appropriate boxes, whether the potential adverse impacts have been avoided or minimized and whether any resource compensation is proposed.

Table 3a

Potential Adverse Impacts on Coastal Resources	Applicable	Impacts Are Avoided	Impacts Are Minimized	Compensation Is Proposed	Not Applicable
Characteristics and Functions of Resources - CGS § 22a-93(15)(H)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Flooding - CGS § 22a-93(15)(E)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Waters Circulation Patterns - CGS § 22a-93(15)(B)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drainage Patterns - CGS § 22a-93(15)(D)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Patterns of Shoreline Erosion and Accretion - CGS § 22a-93(15)(C)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visual Quality - CGS § 22a-93(15)(F)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Quality - CGS § 22a-93(15)(A)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wildlife, Finfish, Shellfish Habitat - CGS § 22a-93(15)(G)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 3b

Potential Adverse Impacts on Water-dependent Uses and Opportunities	Applicable	Impacts Are Avoided	Impacts Are Minimized	Compensation Is Proposed	Not Applicable
Locating a non-water-dependent use at a site physically suited for, or planned for location of, a water-dependent use - CGS § 22a-93(17)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Replacing an existing water-dependent use with a non-water-dependent use - CGS § 22a-93(17)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Siting a non-water-dependent use which would substantially reduce or inhibit existing public access to marine or tidal waters - CGS § 22a-93(17)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part VI: Consistency Analysis

Explain how the proposed activity is consistent with all of the applicable enforceable policies identified in Part V, why any remaining adverse impacts resulting from the proposed activity or use have not been mitigated, and why the project as proposed is consistent with the enforceable policies of Connecticut's Coastal Management Program. If an adverse impact **may** result from the proposed Federal activity, describe what project design features may be used to eliminate, minimize, or mitigate the potential for adverse impacts. For proposed Federal Development Projects, please describe the stormwater best management practices that will be utilized. Such systems should be designed to meet the guidance provided in the accompanying instructions.

No work is proposed on the subject parcel or potential laydown areas that would degrade any of the interests identified within the CAM zone. Construction of the proposed museum represents redevelopment of an urban waterfront parcel and includes significant meaningful public access to and along the waterfront. Museum design and construction will be FEMA/NFIP compliant, based on conservative estimates of sea level rise and flood hazards. The constructed museum and related site improvements will not increase impervious area on the site, since its current state is largely hard pack gravel, which for the past several decades has been used as parking overflow. The museum construction will replace parking lot/concrete plaza runoff with relatively clean roof runoff. The site design incorporates water quality enhancements such as a light colored roof to ensure the discharge from the site will not modify existing water chemistry and a stormwater cistern. Though some fill seaward of the coastal jurisdiction line is proposed, this improvement will not impair the integrity of adjacent coastal resources and is considered in scale with the adjacent developed shorefront areas.

Check if additional sheets are attached to this page

Part VII: Level of Consistency and Identification of Legal Authority that Prohibits Full Consistency, if Applicable

Federal regulations allow Federal activities to be less than fully consistent with a State's enforceable policies **only** if "full consistency is prohibited by existing law applicable to the Federal Agency" [15 CFR 930.32]. Please check the appropriate box below to indicate the activities degree of consistency.

Project is *fully* consistent with Connecticut's enforceable policies

Project is *not fully* consistent with Connecticut's enforceable policies, but is consistent to the maximum extent practicable

If the proposed Federal Activity described in this form is not *fully* consistent with Connecticut's enforceable policies, but only consistent to the maximum extent practicable, in accordance with 15 CFR 930.32, please identify and describe the statutory provisions, legislative history, or other legal authority which limits the federal agency's discretion to comply fully with Connecticut's Coastal Management Program. Please attach additional pages if necessary. Attach copies of the relevant statutory provisions, legislative history, or other legal authority cited.

Check if additional sheets are attached to this page

Part VIII: Coastal Zone Management Act Consistency Statement

Note: This Part *must* be completed for all submissions

<p>In this Statement “Federal Agency” means:</p> <p>United States Coast Guard</p> <p>and “the project” means:</p> <p>National Coast Guard Museum</p> <p>This document provides the State of Connecticut Coastal Management Program with the required Consistency Determination under CZMA Section 307(c)(1) [or (2)] and 15 CFR Part 930, Subpart C, for the project described in this <i>Coastal Management Consistency Review Form for Federal Activities</i>. This determination is provided by the Federal Agency identified above. The information in this Consistency Determination is provided pursuant to 15 CFR Section 930.39. The Federal Agency has determined that the project affects the land or water uses or natural resources of Connecticut as described above. Based on the information, data, and analysis included in the <i>Coastal Management Consistency Review Form for Federal Activities</i> for the project, the Federal Agency has determined that the proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Connecticut Coastal Management Program as evaluated in this form.</p> <p>Pursuant to 15 CFR Section 930.41, the Connecticut Coastal Management Program has 60 days from receipt of this form in which to concur with or object to this Consistency Determination, or to request an extension under 15 CFR Section 930.41(b).</p>
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Part IX: Certifying Signatures

<p>“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief.”</p>	
<p>Signature of Certifier</p> <p><u>Dean J. Amundson</u> Name of Certifier (print or type)</p>	<p>Date</p> <p><u>Env. Planning Program Manager</u> Title (if applicable)</p>
<p>Signature of Preparer</p> <p><u>Megan B. Raymond</u> Name of Preparer (print or type)</p>	<p>Date</p> <p><u>Lead Environmental Scientist</u> Title (if applicable)</p>

CONSISTENCY WITH APPLICABLE STATUTORY COASTAL GOALS AND POLICIES

1.0 BACKGROUND

1.1 Description of Project

The U.S. Coast Guard (USCG or Coast Guard) is proposing to allow the National Coast Guard Museum Association (NCGMA) to construct an approximately 80,000 square-foot museum on a site in downtown New London, Connecticut on land owned by the Coast Guard. The proposed federal action, as described in the 2014 Environmental Assessment (EA) under the National Environmental Policy Act (NEPA), consisted of USCG acquisition, by gift, of a 0.34-acre parcel of land on Water Street in downtown New London, allowing the National Coast Guard Museum Association (NCGMA) to construct a museum on the acquired property, and potential acquisition and long-term operation of the museum by the U.S. Coast Guard (USCG).

The USCG acquired the 0.34-acre parcel from the city of New London in 2014. At that time, a Coastal Consistency Review application was submitted to CT DEEP and DEEP concurred that initial acquisition was consistent to the maximum extent practicable, but only for land acquisition. Changes to the proposed action as evaluated in the 2018 Supplemental Environmental Assessment (SEA) include the acquisition of additional land as well as changes to the museum design that affect its size, footprint, related in-water activities, and the overall relationship of the building to the surrounding area. Since construction of a museum and shoreline improvements will be an indirect effect of the proposed Coast Guard actions, the potential impacts of such construction and long-term operation are evaluated herein.

The proposed NCGM will provide a public educational space on the waterfront that will add to the historical narrative within the City of New London, strengthen the relationship between the USCG and New London, draw visitors to New London and the waterfront, and improve public access to the waterfront by transit and foot via an associated pedestrian bridge that is being permitted and constructed separately by the National Coast Guard Museum Association (NCGMA). The construction of the museum will allow the public to experience the past, present, and future significance of the USCG and the services it has provided to our nation and will allow the U.S. Coast Guard (USCG) to properly preserve, record and display USCG artifacts currently stored elsewhere. It is expected that the NCGM will draw an additional 200,000 visitors to the waterfront area on an annual basis. Many of these individuals are also expected to utilize one or more of the various intermodal transportation hubs within the downtown New London area.

1.2 Coastal Zone Management Overview and Applicability

The U. S. Coast Guard (Coast Guard) owns the subject upland property and its attendant riparian rights. The Coast Guard intends to authorize the National Coast Guard Museum Association, Inc. to engage in the construction of the Museum, including the proposed placement of bulkhead and fill, for the sole purpose of offering said improvements to the Coast Guard as a gift upon completion. In order to comply with the requirements of the federal statute authorizing the establishment of a National Coast Guard Museum (14 USC 98), it is anticipated that the State of Connecticut will convey, and the Coast Guard will accept title to the submerged public trust lands necessary for such anticipated work.

While land, the use of which is by law subject solely to the discretion of or which is held in trust by the Federal Government, is by definition excluded from the coastal zone (16 U.S.C. 1453(1)), the Coast Guard

acknowledges that allowing the development of a NCGM on its property, including the exclusive use of its riparian rights for such development, is a federal activity that may affect the coastal zone and impact boundaries beyond the federal property, and therefore subjects the development of the NCGM to federal coastal consistency requirements and determination of consistency to the maximum extent practicable within the enforceable provisions of the Connecticut Coastal Management Act.

As used in this analysis, the terms “proposed project,” “project site,” or “on-site” include activities that will occur on and adjacent to the existing 0.34 acre parcel, in recognition that the Coast Guard intends to acquire additional land from both the City of New London and the State of Connecticut, such that the entire museum proper will be owned by the Coast Guard.

The proposed project was evaluated within the context of legislative goals and policies described in the CCMA. The CCMA sets forth policies established for federal and state agencies in carrying out their responsibilities within or affecting resources within the coastal boundary. Specific to the proposed project is CGS Section 22a-92(c)(1)(L). The policy is: *to promote the revitalization of inner city urban harbors and waterfronts by encouraging appropriate reuse of historically developed shorefronts, which may include minimized alteration of an existing shorefront in order to achieve a significant net public benefit, provided:*

- (i) such shorefront site is permanently devoted to a water dependent use or a water dependent public use such as public access or recreation for the general public and the ownership of any filled lands remain with the state or an instrumentality thereof in order to secure public use and benefit in perpetuity;*
- (ii) landward development of the site is constrained by highways, railroads or other significant infrastructure facilities;*
- (iii) no other feasible, less environmentally damaging alternatives exist;*
- (iv) the adverse impacts to coastal resources of any shorefront alteration are minimized and compensation in the form of resource restoration is provided to mitigate any remaining adverse impacts; and*
- (v) such reuse is consistent with the appropriate municipal coastal program or municipal plan of development.*

Commentary and Analysis:

Development of the NCGM on this site is consistent with the provisions of CGS Section 22a-92(c)(1)(L). The shorefront site will be permanently devoted to a water dependent public use; landward development is constrained by the active rail lines associated with Union Station; no other feasible, less environmentally damaging alternatives exist, as demonstrated in the 2014 EA and 2018 SEA alternatives analyses; the adverse impacts have been minimized and will be compensated in the form of daylighting of a portion of the City Pier Plaza; and finally, the NCGM is consistent with planning documents and regulations of the City of New London.

1.3 Description of the Project

The proposed activities include the following:

- Removal of approximately 1,080 cubic yards (CY) (1,065 square feet (SF)) of rubble from Thames River shoreline;
- Removal of approximately 500 CY (5,330 SF) of existing concrete platform from the City Pier Plaza;
- Removal of 85 16" steel encased concrete piling beneath City Pier Plaza;
- Construction of approximately 272 linear feet (LF) of steel sheet pile bulkhead with concrete cap to elevation 6.5 feet NAVD88, including 100 LF of open shoreline, 70 LF of previous City Pier Plaza shoreline, 77 LF of return that abuts the remaining City Pier Plaza and a 25-foot return at northern bulkhead extent;
- Placement of approximately 2,020 CY (5,330 SF) of fill in previous City Pier Plaza footprint; and
- Placement of approximately 1,025 CY (3,270 SF) of fill in the intertidal and subtidal Thames River to a water depth of approximately 10 feet.

The project site is located along the western side of the Thames River on the downtown New London waterfront adjacent to Water Street near Union Station. The project site is located within the Connecticut coastal boundary (CT DEEP, 2014a), and includes coastal resources categorized in the Connecticut Coastal Management Manual.

The site lies between an existing parking lot and the northern portion of the pile-supported City Pier Plaza. The development of the museum would require shoreline alteration of 170-linear feet of Thames River bank. Currently, the bank is comprised of approximately 100-linear feet of small boulders and construction rubble and 70-feet of shallow slope rip-rap stabilization beneath City Pier Plaza. To accommodate construction of the museum, the northern portion— approximately 8,900 square feet of the pile-supported supported City Pier Plaza will be removed. Steel-sheeting will be installed approximately 19-feet west of the existing seaward extent of the City Pier Plaza to create a new shoreline configuration. Following installation of the sheet piling, the area will be backfilled to elevation 6.5-foot NAVD and land supportive of the proposed museum building will be created. Proposed activities are depicted on site plans entitled *National Coast Guard Museum* dated October 15, 2018 and attached hereto.

2.0 COASTAL RESOURCES OVERVIEW

A number of coastal resources, as identified in the Connecticut Coastal Management Act (CCMA), are located adjacent to the project site. In addition to general resources, applicable to all proposed activities within a coastal zone, the following resources have been identified adjacent to the project site:

Coastal Hazard Area – A coastal hazard area includes land areas inundated during coastal storm events or subject to erosion induced by such events. Coastal flood hazard areas generally include all areas designated as A-zones and V-zones by FEMA. Developed shorefronts include harbor areas that have been highly engineered and developed, resulting in the functional impairment or substantial alternation of their natural physiographic features of systems. The NCGM will be constructed over an existing gravel parking lot as well as a portion of the existing City Pier Plaza and adjacent Thames River, which is classified as an estuarine embayment (CT DEP, 2000a). The site lies within FEMA-designated AE and VE flood zones, which extend up to 11-feet and 14-feet NAVD88 respectively. The flood zone areas are mapped as Coastal Flood Hazard areas per the CCMA.

Coastal Waters, Estuarine Embayments, and Nearshore Waters – The Thames River is considered an estuarine embayment and nearshore coastal waters (Long Island Sound) are located off-site to the south.

Developed Shorefront – Given the number of marine transportation facilities and supporting infrastructure in the project area, the waterfront is highly engineered and considered Developed Shorefront, which is defined as “harbor areas which have been highly engineered and developed resulting in the functional impairment or substantial alteration of their natural physiographic features or systems.” Specifically, the nature of the 0.34 acre property as a sparsely vegetated parking area with an armored bank is consistent with the definition of developed shorefront. Seaward of the rubble bank, the Thames River is mapped as an *Estuarine Embayment* and to the south at the confluence with Long Island Sound, *Nearshore Waters* exist. A summary of the aquatic environment adjacent to the proposed project site and relation to the proposed activities follows.

The intertidal area is located adjacent to a developed shorefront and consists of a shallow profile rubble strewn bank and a stony, coarse sand beach and extends to the mean low water elevation -1.9 feet NAVD88. Clumps of rock weed (*Fucus spp*) colonize the rubble and fill material along the shoreline. Remnant sheet piling, refuse, pilings and other fill material is located within the intertidal zone and extends seaward. The variable condition of the shoreline is reflective of a modified and engineered shoreline profile. No tidal wetlands are located on or adjacent to the proposed project site.

Shellfish Concentration Areas – The subtidal work area extends from approximately elevation -1.9 to -5 feet NAVD 1988. Remnant construction slag is located in the subtidal zone as well as rubble eroded from the shoreline. Refuse exists in this area as well. No submerged aquatic vegetation (SAV) is present within or adjacent to the shoreline. A small portion of a mapped shellfish concentration area is located within the project site. The mapped shellfish area supports commercially viable hard clams (*Mercenaria mercenaria*). However, the subtidal area adjacent to the NCGM site has not been actively harvested for shellfish in decades. The consistent sediment resuspension resulting from adjacent ferry operations is not conducive to shellfish settlement. Also, the consistent boat traffic in this area may present navigational conflicts to active shellfishing. In concert, the condition of the benthic habitat in water and upland uses is inconsistent with a commercially viable shellfish bed in this location. This observation is further supported by the Connecticut Aquaculture mapping, which designates the project area as a “prohibited” area for shellfishing.

Analysis of potential impacts to each of these resource areas is included in the sections that follow:

3.0 Consistency with Policies

The following analysis is organized in a manner that is consistent with the 2014 Coastal Consistency Determination associated with this project for acquisition of land, with which DEEP concurred. Relevant policies are presented, followed by commentary and analysis that demonstrates consistency.

Policy: *CGS § 22-92(a)(2) To preserve and enhance coastal resources in accordance with the policies established by chapters 439, 440, 446i, 446k, 447, 474 and 477.*

Policy: *CGS § 22a-92(a)(5) To consider in the planning process the potential impact of a rise in sea level, coastal flooding and erosion patterns on coastal development so as to minimize damage to and*

destruction of life and property and minimize the necessity of public expenditure and shoreline armoring to protect future new development from such hazards.

Policy: CGS § 22a-92(b)(2)(F) To manage coastal hazard areas so as to ensure that development proceeds in such a manner that hazards to life and property are minimized and to promote nonstructural solutions to flood and erosion problems except in those instances where structural alternatives prove unavoidable and necessary to protect commercial and residential structures and substantial appurtenances that are attached or integral thereto, constructed as of January 1, 1995, infrastructural facilities or water dependent uses.

Commentary and Analysis:

The project area is mapped by the Federal Emergency Management Agency (FEMA) within the VE Zone and the AE zone. The A zone indicates the Special Flood Hazard Area, while the V zone indicates, “*high hazard areas along coastlines that are subject to high water levels and wave action from strong storms and hurricanes.*” The museum building will lie within both zones, and as a result, the requirements of the more restrictive VE zone will apply.

The proposed NCGM will be constructed in a manner that is consistent with the National Flood Insurance Program (NFIP) requirements for the development of new buildings within A zones to ensure that developments will not increase the flood hazard on other properties.

Until recently, projects proposed on federally owned lands were subject to the requirements of EO 11988 (Floodplain Management). To comply, an eight-step process must be completed for actions taking place within a floodplain or wetland. EO 11988 requires that to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains are avoided, and the direct and indirect support of floodplain development is avoided wherever there is a practicable alternative. Under EO 11988, actions must be taken to reduce the risk of flood loss; to minimize the impact of floods on human safety, health, and welfare; and to restore and preserve the natural and beneficial values served by floodplains in carrying out their functions (FEMA, 2017b). The eight step process is as follows:

Step 1: Determine whether the proposed action is located in a 100-year floodplain – The project site was determined to be located in the FEMA 100-year floodplain.

Step 2: Notify the public at the earliest possible time of a proposal to consider an action in a floodplain and involve the affected and interested public in the decision-making process – The public was notified of the proposal to consider an action in a floodplain through the initial public scoping and review of the 2014 NEPA Environmental Assessment and more recently relation to the 2018 NEPA Supplemental Environmental Assessment.

Step 3: Identify and evaluate practicable alternatives to locating the proposed action in a floodplain – Numerous alternative sites were considered for placement of the NCGM, as presented in the 2014 EA and 2018 SEA along with numerous prior studies.

Step 4: Identify the potential direct and indirect impacts associated with the occupancy or modification of the floodplain – Direct impacts from coastal flooding include inundation of the site as well as wave action. Indirect impacts would occur if visitors were present during these conditions. Areas below the BFE within

the VE zone will be free of obstruction and used solely for building access and storage. They will not be finished spaces, but rather allowed to flood. The first-floor "occupied" level of the museum will be constructed well above the 0.2 percent occurrence (500-year) flood elevation, thus reducing the potential for direct impacts. The museum will not be open to visitors during extreme storm events, thus minimizing indirect impacts. In addition, the museum will establish a weather and flood monitoring program, and detailed evacuation plans will be created for instances of potential flooding.

Step 5: Where practicable, design or modify the proposed action to minimize the potential adverse impacts within the floodplain and to restore and preserve its natural and beneficial values – The waterfront site and the museum are being designed with a focus on minimizing potential adverse impacts within the floodplain upon consultations with state and federal environmental regulators. The at-grade construction will be limited to building access and a loading dock area with a freight elevator. In accordance with FEMA requirements, the area under the building will be enclosed with breakaway curtain walls. The entry level of the building will be approximately 17 feet above the City Pier Plaza (above the 500-year flood elevation). The structural design of the museum will allow floodwaters to pass unhindered at ground level. The at-grade-level building features will include egress stairs and a loading dock, including a freight elevator. The at-grade construction will be enclosed by a material designed to detach from the framing under high flood loads. The stairs and elevator will have a more robust design for life safety and integrity of operation but will be structurally autonomous so as to protect the integrity of the building's primary structure. The exterior of the museum will be constructed at grades similar to current conditions so as to not impact the current floodplain function. Indirect flood hazard impacts will not occur as a result of the proposed NCGM. The driving factor on coastal flooding is backwater conditions from Long Island Sound. The area is not located in a floodwater storage zone, and construction of the proposed museum and related shoreline improvements will not worsen flooding at adjacent properties.

Step 6: Reevaluate the proposed action to determine: (1) where it is still practicable in light of its exposure to flood hazards in the floodplain, the extent to which it will aggravate the current hazards to other floodplains, and its potential to disrupt floodplain values; and (2) whether alternatives preliminarily rejected at Step 3 are practicable in light of the information gained in Steps 4 and 5 – Based on extensive analysis and design assessment relative to flood hazards, construction of the NCGM at the subject site is believed to be practicable, will not aggravate current hazards to other floodplains or disrupt existing floodplain values, and remains the preferred location for the future NCGM. Given the nexus of the Coast Guard mission and history, the location of the museum in relation to the water is and continues to be an important factor in its siting.

Step 7: If the reevaluation results in a determination that there is no practicable alternative to locating the proposal in the floodplain, publish a final notice – A final notice was published via the SEA, informing the public of the details of the Proposed Action alternative, including those design elements specifically pertaining to the floodplain environment.

Step 8: Implement the action – The project will proceed to implementation following successful conclusion of regulatory permitting and approvals and fundraising.

On January 30, 2015, President Obama issued Executive Order (EO) 13690. It modified an earlier Executive Order in place since 1977 (EO11988, Floodplain Management) to establish a new Federal Flood Risk Management Standard (FFRMS) for federal taxpayer-funded projects and actions. The new standard required a climate-informed forward look to ensure that federal investments in or near floodplains are

protected in the future. Aimed at increasing resilience against flooding and helping to preserve the natural values of floodplains, the FFRMS directed approaches that would take into account both current and future flood risk to ensure that projects last as long as intended.

In August 2018, Executive Order (EO) 13690, which established the Federal Flood Risk Management Standard, was revoked by Section 6 of EO 13807, *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure*. EO 13807 did not revoke or otherwise alter EO 11988. For the purposes of selecting a design elevation, the guidance provided in EO 13690 has been considered as follows:

The FFRMS offers options for determining the vertical and horizontal extent of a floodplain in planning. The preferred option is an approach that incorporates the use of climate-informed science ("climate informed science approach" or CISA) when providing estimates of future flooding. The other approaches are using freeboard ("freeboard value approach" or FVA) or using the 0.2% annual chance flood elevation, often called the 500-year floodplain (0.2 Percent Floodplain Approach [PFA]).

Federal agencies have developed somewhat different draft procedures for implementation of the FFRMS. Individual agency guidance (much of it in draft form) is presented below:

- The USACE allows use of CISA, FVA, and 0.2PFA to characterize risk and delineate the floodplain. However, additional statements in the guidance state that "*all Corps actions subject to the FFRMS will utilize the CISA approach*" and "*for critical actions that are not subject to the FFRMS, the vertical elevation and horizontal floodplain extent for critical actions will be based on the 0.2 percent annual chance flood.*" The USACE guidance defines the 1% annual chance flood as "*equivalent to the 1 percent flood in the North Atlantic Coast Comprehensive Study (NACCS).*"
- Regarding the use of the FFRMS as a design standard, the USACE guidance states that "*... this vertical elevation will not be used as a design standard or to provide a minimum vertical elevation for use in the planning or design of Corps projects that involve horizontal infrastructure including but not limited to riverine, harbor, and coastal facilities; seawalls; jetties; revetments; engineered beaches and dunes; levees; and interior drainage facilities.*" However, the guidance further states that "*though not intended to be used as an explicit design standard, the identified vertical flood elevation and corresponding horizontal extent of the floodplain must be considered when implementing the eight-step decision making process.*"
- FEMA proposes to "*use the FFRMS-FVA as the baseline approach for both critical and non-critical FEMA federally-funded projects.*" FEMA reasons that this will help standardize its procedures in both non-disaster and post-disaster conditions, and the use of freeboard tends to compensate for unknown factors. Furthermore, the CISA is not as well established for noncoastal flood risks. FEMA is "*not proposing to use the FFRMS-0.2PFA because of the limited national availability of information on the 0.2 percent annual chance flood elevation.*"
- FEMA states that the FVA is the 100-year BFE plus 3 feet for critical actions and the 100-year BFE plus 2 feet for non-critical actions.
- In its conclusion, FEMA explains that "*FEMA proposes to combine approaches and use the FFRMS-FVA to establish the floodplain for non-critical actions and allow the use of the FFRMS-FVA floodplain or the FFRMS-CISA for critical actions, but only if the elevation established under FFRMS-CISA is higher*

than the elevation established under FFRMS-FVA. This proposal balances flexibility with standardization...."

In terms of the NCGM project:

- The CISA Design Approach = Independent Study
- The FVA Design Approach = 100-year floodplain elevation+ 2 feet = 16 feet
- The 0.2 PFA Design Approach = 500-year floodplain elevation = 18 feet

The proposed entry level of the NCGM will be approximately 17 feet above the City Pier Plaza at elevation ±23 feet, which is a full five feet above the 500-year flood elevation and more conservative than any published guidance as described above.

The National Flood Insurance Program (NFIP) outlines requirements for the development of new buildings within A zones to ensure that developments will not increase the flood hazard on other properties. Table 1 on the following page paraphrases the NFIP guidelines from the document, *"Managing Floodplain Development through the National Flood Insurance Program" (FEMA, 2017a), as discussed in "Unit 5, The NFIP Floodplain Management Requirements, Section F. New Buildings in V Zones."* Table 1 demonstrates how each requirement will be achieved.

TABLE 1
NFIP Requirements for Zone V

NFIP Requirement/ Guidance	Proposed Action Alternative Compliance
<i>The new building cannot be over open water.</i>	The proposed museum will be located entirely within upland areas and will not extend over open water of the Thames River.
<i>All new construction and substantial improvements to buildings in V Zones must be elevated on pilings, posts, piers, or columns so that the lowest horizontal structure member of the lowest floor (excluding the pilings or columns) is elevated to or above the base flood level.</i>	The first-floor entryway will consist of foundational piers designed to withstand storm force level winds and flooding. The piers will be drilled into and attached to the underlying bedrock to provide structural strength and ensure that the piers are not affected by any lateral movement of the surrounding soil material due to erosion. The building features within the entryway will be limited to a set of stairs, a bank of elevators to access the museum from this level, and a loading dock. These stairs and elevators will be designed to satisfy life safety requirements and enclosed within breakaway curtain walls designed to break away under storm forces without causing any damage to the museum building structure or nearby facilities. The stairs and elevator bank will have a more robust design so as to provide an adequate fire escape route but would be designed to break away under severe flooding conditions without impacting the integrity of the building.
<i>Fill is not allowed for structural support for buildings within V Zones because of the severe erosion potential of such locations.</i>	No fill will be placed for the purposes of structural support.
<i>The design of the supporting foundation must account for wind loads in combination with the forces that accompany the base flood.</i>	The design of the foundation will account for wind loads and the forces of a base flood.

TABLE 1
NFIP Requirements for Zone V

NFIP Requirement/ Guidance	Proposed Action Alternative Compliance
<i>A registered professional engineer or architect must develop or review the structural design, specification, and plans for construction and certify that the design and planned methods of construction are in accordance with accepted standards of practice for meeting the above provisions.</i>	A registered professional engineer and architect will be responsible for the design and certify that the design and planned methods of construction are in accordance with accepted standards of practice.
<i>Any walls below the lowest floor in a building in a V Zone should give way under wind and water loads without causing collapse, displacement, or other damage to the elevated portion of the building or the supporting pilings and columns.</i>	The walls of the entryway will be constructed of a material that is designed to break away under storm forces without causing damage to the museum building structure or nearby facilities.
<i>A breakaway wall shall have a design safe loading resistance of not less than 10 and no more than 20 pounds per square foot. Use of breakaway walls which exceed a design safe loading resistance of 20 pounds per square foot (either by design or when so required by local or state codes) may be permitted only if a registered professional engineer or architect certifies that the designs proposed meet certain conditions.</i>	A registered professional engineer and architect will design the walls of the entryway and ground-level facilities to meet these standards.

The first floor of the museum will be located 5 feet above the 500-year flood elevation, thus significantly exceeding FEMA’s design requirements. An estimate of Sea Level Rise over time for Connecticut is presented on the CT DEEP website. A 2080, an estimate of 36 inches or 3 feet was estimated (https://www.ct.gov/deep///cwp/view.asp?q=480782&deepNav_GID=2022, 2018). The currently proposed design allows for this level of increase.

Policy: CGS § 22a-92(a)(6) To encourage public access to the waters of Long Island Sound by expansion, development and effective utilization of state-owned recreational facilities within the coastal area that are consistent with sound resource conservation procedures and constitutionally protected rights of private property owners.

Commentary and Analysis:

Site access under existing conditions since the USCG acquired the downtown New London waterfront parcel in 2014 and for many years prior has been restricted except immediately to the south via the City Pier Plaza. A future NCGM will extend public access to the north and will accommodate pedestrian friendly entrances from the ground as well as from the proposed pedestrian overpass bridge.

Unlike other waterfront buildings including museums or educational facilities, the NCGM will be the public’s museum, affording meaningful public access to and through the structure itself. The museum will be free to all visitors during established regular hours of operation. After-hours event opportunities will be provided through corporate events, receptions, weddings, and special engagements, bringing additional visitors to the waterfront location.

Integral to the vision and design for the NCGM is connecting people with the waterfront, not only through unhindered waterfront access, but through documentation of the history of coastal waters, the role of

the USCG, and through water exhibits that will extend the NCGM's reach beyond the physical walls by bringing the visiting public outside to view in-water exhibits and activities. Outdoor and in-water exhibits, as well as interactive activities would be key elements of the museum, with scheduled demonstrations and displays providing opportunities for the public to interact with the shoreline and with Coast Guard members. The adjacent City Pier also provides opportunities for vessels to visit the area, providing opportunities to bring maritime watercraft to the museum visitor's experience.

The NCGM is anticipated to increase patronage to the City Pier Plaza and City Pier; and visitation by museum patrons would be consistent with and augment public use of these facilities. The museum would offer a new opportunity for public use and waterfront access. A publicly accessible waterfront area would replace the former private parking area, with an at-grade interface with the Thames River. Construction of the NCGM would not restrict pedestrian circulation along the river's edge. The at-grade level of the museum would provide open access to the waterfront and to City Pier Plaza.

Policy: CGS § 22a-92(b)(2)(J) To maintain the natural relationship between eroding and depositional coastal landforms and to minimize the adverse impacts of erosion and sedimentation on coastal land uses through the promotion of nonstructural mitigation measures. Structural solutions are permissible when necessary and unavoidable for the protection of infrastructural facilities, cemetery or burial grounds, water-dependent uses, or commercial and residential structures and substantial appurtenances that are attached or integral thereto, constructed as of January 1, 1995, and where there is no feasible, less environmentally damaging alternative and where all reasonable mitigation measures and techniques have been provided to minimize adverse environmental impacts.

Commentary and Analysis:

The project site is set along the developed shorefront of the Thames River in downtown New London. Broken concrete rubble covers this portion of the shoreline and adjoining waterfront land to the north and south is improved with ferry docks and the City Plaza and City Pier respectively. The developed site will be stable and not subject to adverse impacts of erosion and sedimentation. BMPs are proposed during construction to minimize erosion and sedimentation. Given the nature of the shoreline and site conditions, structural solutions in the form of bulkheading would be constructed for the protection of the NCGM from shoreline erosion.

Policy: CGS § 22a-92(c)(1)(K) To require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures and to encourage the removal of illegal structures below mean high water which unreasonably obstruct passage along the public beach.

Commentary and Analysis:

The shoreline along this segment of the Thames River is developed and does not include a public beach.

Policy: CGS § 22a-92(c)(2)(B) To maintain, enhance, or, where feasible, restore natural patterns of water circulation and fresh and saltwater exchange in the placement or replacement of culverts, tide gates or other drainage or flood control structures.

Commentary and Analysis:

The NCGM project will not involve construction of culverts, tide gates, or other drainage or flood control structures that would interfere with patterns of water circulation or fresh and saltwater exchange. Currently on the museum site, much of the subsurface material is comprised of fill material with a surface material of compacted crushed stone. The remainder of the site is covered by the concrete City Pier Plaza. Due to the nature of these materials, little infiltration occurs on the property, with stormwater flowing overland to the Thames River. Except for a small drainage system associated with the promenade, there are no drainage systems currently located within the museum project area.

3.2 Coastal Waters, Estuarine Embayments, Nearshore Waters, Offshore Waters

Policy: CGS § 22-92(a)(2) *To preserve and enhance coastal resources in accordance with the policies established by chapters 439, 440, 446i, 446k, 447, 474 and 477.*

Policy: CGS § 22-92(c)(2)(A) *To manage estuarine embayments so as to ensure that coastal uses proceed in a manner that assures sustained biological productivity, the maintenance of healthy marine populations and the maintenance of essential patterns of circulation, drainage and basin configuration; to protect, enhance and allow natural restoration of eelgrass flats except in special limited cases, notably shellfish management, where the benefits accrued through alteration of the flat may outweigh the long-term benefits to marine biota, waterfowl, and commercial and recreational finfisheries.*

Commentary and Analysis:

The coastal resources on the Thames River shoreline are largely comprised of developed shorefront reflective of the engineered environment. The proposed in-water work will encroach on the Thames River with the placement of sheet pile bulkhead and fill. No tidal wetlands or submerged aquatic vegetation are located along the shoreline. During construction, measures will be implemented to avoid temporary impacts. In the long term, the biological productivity, marine populations, and maintenance of patterns of circulation, drainage, and basin configuration will be maintained.

The shoreline adjacent to the project site is located within a developed landscape and is flanked by high intensity, water dependent uses. The construction of a new bulkhead will target the autumn and winter months or utilize appropriate confinement techniques to avoid potential conflicts with economically important organism reproduction in the estuary. Though a portion of the benthic environment will be filled, the concurrent installation of vertical sheet piling may mitigate the loss of benthos by providing vertical structure as substrate for a number of fouling species of organisms to colonize. Potential species may include bryozoans, barnacles, hydroids, sponges, ascidians, and blue mussels, which are characteristic lower estuary fouling species (Whitlatch, 1994, 1998). In turn, these fouling species may provide food and habitat for some species of fish common to this area, such as cunner and blackfish. A number of studies have demonstrated that fauna associated with pilings and permanent in-water structures provide a substantial percentage of the food content for cunners and blackfish (Steimle and Ogren, 1982).

3.3 Developed Shorefront

Policy: CGS § 22a-92(b)(2)(G) To promote, through existing state and local planning, development, promotional and regulatory programs, the use of existing developed shorefront areas for marine-related uses, including but not limited to, commercial and recreational fishing, boating and other water-dependent commercial, industrial and recreational uses.

Commentary and Analysis:

The NCGM will be constructed within a developed shorefront area surrounded by water dependent uses, including the ferry operations to the north and City Pier immediately to the south. The nautical theme of the museum will embrace the history of the USCG and will take advantage of its waterfront location to showcase vessels and demonstration exhibits. Notably, the NCGM will provide public access to and along the Thames River for passive recreation and will provide educational learning opportunities through in-water and water-related exhibits. While the construction and operation of the NCGM will not be subject to local permitting, museums with nautical themes are permitted in the City of New London Waterfront Development zoning district.

The project represents an ideal redevelopment mechanism for this section of shoreline. As stewards of the sea, the USCG is intrinsically linked to water dependence. The museum will provide a showcase for this history and the adjacency of dock space will allow for an opportunity to demonstrate examples of Coast Guard activities. This piece of land contains 170-linear feet of frontage on the Thames River located between two active ferry terminals and the City Pier dockage. In that that the museum will enhance greater understanding of the Coast Guard's mission and overall knowledge of the ocean and coastal environmental without adding to navigational congestion in this area is an ideal balance between existing and proposed uses. As described above, the project maintains consistency with the CCMA by not adversely impacting coastal resources, providing general public access to and along the waterfront and supporting the revitalization of the New London waterfront.

3.4 General Development

Policy: CGS § 22a-92(a)(1) To ensure that the development, preservation or use of the land and water resources of the coastal area proceeds in a manner consistent with the rights of private property owners and the capability of the land and water resources to support development, preservation or use without significantly disrupting either the natural environment or sound economic growth.

Commentary and Analysis:

The NCGM project will involve construction on the New London downtown waterfront. The project will not significantly impact coastal or other natural resources. The project will not infringe upon the rights of private property owners in the area and will not significantly disrupt the natural environment or sound economic growth. In fact, the NCGM is expected to result in positive economic impacts on the surrounding area (see consistency with CGS § 22a-92(a)(4) outlined below) and enhance the sue of private lands to the north (Cross Sound Ferry) as well as public facilities to the south (City Pier and City Pier Plaza).

Policy: CGS § 22a-92(a)(4) To resolve conflicts between competing uses on the shorelands adjacent to marine and tidal waters by giving preference to uses that minimize adverse impacts on natural coastal resources while providing long term and stable economic benefits.

Commentary and Analysis:

The NCGM project will minimize adverse impacts on coastal resources and is expected to result in positive social and economic impacts on the surrounding area, including through the employment of local and regional construction contractors, employment of approximately 30 full-time and part-time staff during operation, and through visitation by approximately 200,000 museum patrons each year. The NCGM is also planned to be integrated with public spaces. Table 2 on the following page summarizes the on-site alternatives analysis that led to the selection of the proposed project.

**TABLE 2
Alternative Comparison Matrix**

Practicability Category	Factor	50,000 Cantilever Alternative	30,000 – 40,000 sf Alternative	90,000 – 100,000 sf Alternative	70,000 – 80,000 sf Alternative
Availability	Owned or available for gift, use agreement or conveyance	YES	YES	YES	YES
Logistics	Sufficient Museum Size	NO	NO	YES	YES
	FEMA Compatible	NO	YES	YES	YES
Cost/Economics	Acquisition/ Use does not Require USCG Expenditure	YES	YES	YES	YES
	Size/Design supports economic sustainability	NO	NO	NO	YES
Environmental Factors	Wetland Impacts	NO	NO	NO	NO
	Impacts to Federally Listed T&E Species	NO	NO	NO	NO
	Fill required	NO	NO	YES	YES
	Open Water Impacts	NO	NO	YES	YES
	Encroachment in previously modified in-water areas	N/A	N/A	YES	YES
	Commensurate area of open water available for daylighting	N/A	N/A	NO	YES
	Least Environmentally Damaging Practicable Alternative	NO	NO	NO	YES

Policy: CGS § 22a-92(a)(9) To coordinate planning and regulatory activities of public agencies at all levels of government to ensure maximum protection of coastal resources while minimizing conflicts and disruption of economic development.

Commentary and Analysis:

The Coast Guard has prepared a NEPA EA (2014) and SEA (2018) evaluating the potential environmental impacts of acquiring additional lands and allowing construction and operating the NCGM. Public involvement and agency coordination activities were initiated at the beginning of the preparation of the initial EA in 2014 and at the beginning of the preparation of the SEA in 2017 to ensure that information was provided to the general public and agencies, and that input from these parties was received and considered as the EA and SEA were prepared. Both the Draft EA and the Draft SEA were made available to the public as part of this process.

Consultation and coordination have extensively occurred at all levels of government, including the City of New London, State of Connecticut, and federal agencies. Numerous meetings have taken place with the City of New London, the Connecticut DEEP, the State Historic Preservation Office, the Department of Economic & Community Development, the Army Corps of Engineers, and FEMA. A Memorandum of Agreement has been executed to ensure that the proposed NCGM is well integrated with the city, and with the proposed pedestrian overpass being funded by the State of Connecticut.

3.5 Coastal Structures and Filling

Policy: *CGS § 22a-92(a)(2) To preserve and enhance coastal resources in accordance with the policies established by chapters 439, 440, 446i, 446k, 447, 474 and 477.*

Policy: *CGS § 22a-92(b)(1)(D) To require that structures in tidal wetlands and coastal waters be designed, constructed and maintained to minimize adverse impacts on coastal resources, circulation and sedimentation patterns, water quality, and flooding and erosion, to reduce to the maximum extent practicable the use of fill, and to reduce conflicts with the riparian rights of adjacent landowners.*

Commentary and Analysis:

The NCGM will be built on a parcel along the downtown waterfront. The project will maintain riparian rights of adjacent landowners. In-water work is expected to include pile driving, filling, and other improvements to the outboard (river) side of the project site, which is currently covered with broken concrete rubble on the northern portion and covered by the City Pier Platform on the northern portion. Multiple alternative iterations of museum design have been analyzed to avoid, minimize and mitigate the areal extent of fill in coastal waters. BMPs and project-incorporated protection measures have been developed in consultation with regulatory agencies to avoid significant adverse effects on coastal waters. These BMPs include measures to control erosion and sedimentation. The project site will be stabilized following the completion of ground-disturbing construction activities, and construction will be undertaken using measures to avoid erosion and sedimentation.

In accordance with Section 438, *Stormwater Runoff Requirements for Federal Projects of the Energy Independence and Security Act (EISA)*, a rainwater cistern has been incorporated into the proposed museum design. The proposed cistern will capture and reuse stormwater allowing for rainwater harvesting. The cistern will meet the 95th percentile rainfall event and will be located in the building for gray water reuse (toilet flushing). A high level overflow pipe from the cistern will be connected to the existing stormwater collection system. Stormwater management at the NCGM is anticipated to meet the green infrastructure/low impact development techniques encouraged in the EISA. No new stormwater

outfalls are proposed. An additional measure proposed to manage stormwater includes selecting a light color for the proposed roofing material to minimize potential heating of the stormwater runoff.

The project will result in no conflicts with the riparian rights of adjacent land owners.

Relative to flooding, refer to the discussion under § 22a-92(b)(2)(F) beginning on page 5 of this document.

Policy: CGS § 22a-92(c)(1)(B) To disallow any filling of tidal wetlands and nearshore, offshore and intertidal waters for the purpose of creating new land from existing wetlands and coastal waters which would otherwise be undevelopable, unless it is found that the adverse impacts on coastal resources are minimal.

Commentary and Analysis:

No tidal wetlands occur adjacent to the project site and therefore no filling of such resource will occur; however, coastal waters would be filled. Given the condition of the shoreline and adjacent high intensity water dependent uses, redevelopment of this area is not expected to result in adverse impacts to coastal resources. Land adjoining the project site on the downtown New London waterfront has been developed for automobile parking and loading for ferries (Cross Sound Ferry, Block Island Express, and Fisher Island Ferry), and a waterfront park and boat docks (City Pier Plaza and City Pier). Approximately 3,045 cubic yards of fill is proposed associated with shoreline improvements. Of that, approximately 2,020 cubic yards will be placed beneath the existing City Pier Plaza and approximately 1,025 cubic yards would be placed in what is currently open shoreline within the proposed project site. The project has been designed to minimize adverse impacts to adjacent coastal resources in the short and long term through the use of best construction practices during construction, stormwater management, and consistency with NFIP regulations. The project employs innovative techniques in shoreline design to effectively balance removal of existing structures with proposed structures thus limiting the footprint of direct Thames River disturbance. The adverse impacts that may result from the small amount of fill has been evaluated and minimal (See SEA Sections 4.7.2 and 4.8.2).

3.6 Cultural Resources

Policy: CGS § 22a-92(b)(1)(J) To require reasonable mitigation measures where development would adversely impact historical, archaeological, or paleontological resources that have been designated by the state historic preservation officer.

Commentary and Analysis:

Section 106 consultation with the State Historic Preservation Officer (SHPO) began in 2014 and is ongoing. In response to initial discussions with SHPO, a series of improvements were made, including connection of pedestrian pathways for those people arriving at grade and from the pedestrian bridge. These two pathways will be joined at the southwest corner of the building in a large, full-height entry vestibule that will include an iconic rescue helicopter display. Perhaps most importantly, a quiet façade will face towards the train station and Parade Plaza, so that the museum will remain deferential and recessive to the train station. From the waterfront, the building will be more sculptural and expressive of its cultural significance to the city, but through its distinct and modern architectural language will complement, rather than compete with the historic train station. Taken in the aggregate, this approach

minimizes impact of the project on the Historic District and the train station. Consultation with SHPO has resulted in changes in the project and will ultimately lead to an effects determination and concurrence by the SHPO, incorporating mitigation measures.

3.7 Water Dependent Uses

Policy: CGS § 22a-92(a)(3) To give high priority and preference to uses and facilities which are dependent upon proximity to the water or the shorelands immediately adjacent to marine and tidal waters.

Commentary and Analysis:

The proposed NCGM and associated uses will provide meaningful, general public access to and along the waterfront. No adverse impacts on future water-dependent development are anticipated. The proposed project approach maintains consistency with the legislative goals and policies. The proposed NCGM will not conflict with existing waterfront transportation or recreation uses adjacent to the project site. A water dependent use will not be replaced by the project. Although a portion of City Pier Plaza will be removed in work related to this project, the public access provided by that portion of pier will be replaced by the public plaza associated with the museum and enhanced by the continuum of access throughout the museum site. The project will also be consistent with preferred maritime/nautical uses outlined in the City of New London Plan of Conservation and Development and Zoning Regulations. Museums with nautical themes are permitted in the City of New London Waterfront Development zoning district. The downtown waterfront location will potentially allow for the exhibition of decommissioned Coast Guard vessels, potentially including homeporting the Barque Eagle at City Pier (under separate action). The museum is expected to encourage visitation and public access to the downtown New London waterfront.

Policy: CGS § 22a-92(b)(1)(A) To manage uses in the coastal boundary through existing municipal planning, zoning and other local regulatory authorities and through existing state structures, dredging, wetlands, and other state siting and regulatory authorities, giving highest priority and preference to water-dependent uses and facilities in shorefront areas.

Commentary and Analysis:

See consistency with water-dependent use criteria outlined above for CGS § 22a-92(a)(3).

4.0 POTENTIAL ADVERSE IMPACTS ON COASTAL RESOURCES

4.1 Coastal Flooding

Policy: CGS § 22a-93(15)(E) Increasing the hazard of coastal flooding through significant alteration of shoreline configurations or bathymetry, particularly within high velocity flood zones.

Commentary and Analysis:

The proposed NCGM will not result in increased hazard of coastal flooding through alteration of shoreline configurations or bathymetry. Neither the shoreline configurations nor bathymetry will be significantly altered. As described under the analysis of consistency with CGS § 22a-92(a)(5) under Coastal Hazard Areas, the design of the NCGM will not only comply with, but will exceed applicable NFIP regulations and requirements and will accommodate future potential sea level rise.

4.2 Coastal Waters Circulation Patterns

Policy: CGS § 22a-93(15)(B) Degrading existing circulation patterns of coastal waters through the significant alteration of patterns of tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours.

Commentary and Analysis:

The project will not significantly alter circulation patterns in the Thames River, nor will it affect tidal exchange, flushing rates, freshwater input, or existing basin characteristics and channel contours, except immediately adjacent to the existing rubble shoreline. The USCG is seeking USACE (Section 404 and/or Section 10) and DEEP (Section 401) permits and approvals for in-water work. BMPs and project-incorporated protection measures have been developed and are presented in the SEA. Any additional BMPs required by USACE or DEEP during the course of permit review will be incorporated as well. Collectively, these will avoid significant adverse effects on the Thames River.

4.3 Drainage Patterns

Policy: CGS § 22a-93(15)(D) Degrading natural or existing drainage patterns through the significant alteration of groundwater flow and recharge and volume of runoff.

Commentary and Analysis:

The project will not significantly alter groundwater flow or recharge volume of runoff. The development will take place in an urban developed environment and will make use of existing drainage systems. No new outfalls will be constructed to the Thames River and existing drainage patterns will be maintained.

4.4 Patterns of Shoreline Erosion and Accretion

Policy: CGS § 22a-93(15)(C) Degrading natural erosion patterns through the significant alteration of littoral transport of sediments in terms of deposition or source reduction.

Commentary and Analysis:

Localized impacts of the NCGM and shoreline modifications will be limited to the immediate construction area. The minimal impact from the proposed fill in open water in a heavily impacted subtidal area will be offset by an approximately equal amount of newly-daylighted open water/subtidal area. For both the upland and in-water work, best management practices will be employed. In the upland areas, these measures include standard sedimentation and erosion controls (e.g., geotextile siltation fencing and haybales in accordance with the 2002 Connecticut Guidelines for Sedimentation and Erosion Control guidelines). For the in-water portion of work, sedimentation impacts beyond the immediate work area will be managed with turbidity curtains and floating booms to minimize any temporary aquatic impacts during construction. Construction will target the autumn and winter months to minimize impacts to coastal habitats.

Broken concrete rubble covers this portion of the shoreline and adjoining waterfront land is improved with ferry docks and the City Plaza and City Pier. The proposed NCGM will not significantly alter littoral transport of sediments along the Thames River.

4.5 Visual Quality

Policy: CGS § 22a-93(15)(F) Degrading visual quality through significant alteration of the natural features of vistas and viewpoints.

Commentary and Analysis

The aesthetic character of the downtown New London waterfront area is predominantly centered on the architecture and significance of the buildings located within the historic district, including Union Station, which serves as an anchor within the district. Future construction of the NCGM will result in temporary changes to the visual character of the project area, typical of those associated with construction activity and staging.

The NCGM design does not compete with historic architecture. Rather, construction of a modern building will occur along the downtown waterfront over what is now a gravel-and-dirt parking lot that is mostly level, over portions of the City Pier Plaza, and adjacent to the Thames River. The size and architectural style of the NCGM will contrast with the older structures, but also integrate into the fabric of downtown New London through the scale of its articulation and active program. Nighttime lighting required for safety and security will also expand usage of the site into the evening hours. These changes will be most visible from surrounding properties, including from the City Pier Plaza and City Pier, boats and ferries on the Thames River, and passing trains; and from scenic views of the New London downtown waterfront in Groton, particularly from the Fort Griswold area.

The NCGM will be less visible from many downtown New London streets and locations because the project site is obscured by Union Station and other downtown buildings and the building will be intentionally recessive from this vantage point. The project vicinity along the downtown waterfront is urbanized, and mostly consists of commercial and industrial buildings and structures. Some change will occur within the visual landscape surrounding the project site; however, these changes are not considered to be significant. Additionally, the NCGM will not obstruct scenic views or vistas from the historic Fort Griswold area in Groton. BMPs and protection measures will also be implemented to minimize impacts associated with glare and nighttime lighting required for safety and security.

The museum building is proposed to be modern in style with a combination of exterior materials including a combination of glass and opaque exterior panels, and the use of materials that are resistant to the corrosive forces of salt water, such as stainless steel and coated metals. The opaque façade planned for the west side of the building facing Union Station is intended to serve as a quiet foil, retaining the significant visual impact of Union Station. The aesthetic, height and style of the NCGM will contrast with, rather than replicate the surrounding historic, industrial/commercial, and public uses within the downtown waterfront area.

The NCGM will be fully visible from the Thames River, the Cross Sound Ferry Terminal, the City Pier Plaza and from the Amtrak railroad tracks. Only the uppermost floors of the museum will be visible from Water Street, the Parade Plaza and the Water Street parking garage. As most development and traffic within New London is located on the Water Street side of the Amtrak station and beyond, the NCGM will be

mostly obstructed by this intervening building. During nighttime hours, light emanating from the building as well as lighting surrounding the building for visibility and safety purposes will alter the existing visual environment. However, this alteration will not be significant.

Further, the proposed project takes place within a developed landscape and will impair any vista or viewpoints. An elevated viewing platform is proposed at the eastern extent of the pedestrian access walkway that will allow for access to vistas and viewpoints of the Thames River not currently realized by the existing shoreline construct. The addition of this feature provides an appreciable improvement to public access of the shoreline.

4.6 Water Quality

Policy: CGS § 22a-93(15)(A) Degrading water quality through the significant introduction into either coastal waters or groundwater supplies of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity.

Commentary and Analysis

The proposed project will not result in short term or long term activities that would degrade water quality through the significant introduction of suspended solids, nutrients, toxics, heavy metals, or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity. The existing site is hard packed gravel and concrete, and is nearly impervious, with stormwater discharging to the Thames River via sheet flow. The proposed museum will incorporate water quality conducive measures, such as a light roof to limit temperature increases and use of a stormwater cistern to capture the first flush of stormwater. The anticipated capacity is 10,000 gallons. There will be no vehicular parking on the site, and no appreciable increase in impervious surfaces.

Construction associated with the NCGM will involve ground-disturbing activities, particularly site preparation that has the potential to result in sedimentation of the Thames River; however, BMPs to control erosion and sedimentation have been incorporated into the project design. The project site will be stabilized following the completion of ground-disturbing construction activities, and the site design will include standard design measures to avoid erosion and sedimentation during operation of the NCGM.

4.7 Wildlife, Finfish, Shellfish Habitat

Policy: CGS § 22a-93(15)(G) Degrading or destroying essential wildlife, finfish or shellfish habitat through significant alteration of the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significant alteration of the natural components of the habitat.

Commentary and Analysis

The proposed project involves direct fill of 8,600 SF of land seaward of the high tide line. The majority of this area is currently covered with the pile-supported City Pier Plaza. The shoreline reconfiguration will lie approximately 19 feet west of the current extent of City Pier Plaza. To achieve this, approximately 3,100 SF of the plaza are proposed to be daylighted enhancing the opportunity for natural restoration of habitat and recruitment of endemic species. These shoreline modifications are limited spatially and are not expected to adversely impact population dynamics within the Thames River food web. The installation of

the bulkhead may provide an additional habitat niche as well. A number of studies have demonstrated that fauna associated with pilings and permanent in-water structures provide a substantial percentage of the food content for cunners and blackfish (Steimle and Ogren, 1982).

The coastal resources on the shoreline are largely comprised of developed shorefront reflective of the engineered environment. No submerged aquatic vegetation or tidal wetlands exist in proximity to the site. The Coast Guard has determined that, pursuant to Section 7 of the Endangered Species Act and its implementing regulations at 50 CFR Part 402, the proposed project will have no effect on any listed species or designated critical habitat.

A review request form was submitted to the CTDEEP Natural Diversity Data Base (NDDB) regarding the currently proposed museum on August 10, 2017. In a letter dated August 22, 2017, the CTDEEP stated that no negative impacts to State-listed species (RCSA Sec. 26-306) are anticipated as a result of the Proposed Action Alternative.

4.8 Potential Adverse Impacts on Water-Dependent Uses and Opportunities; Locating a non-Water Dependent Use at a Site Physically Suited for, or Planned for Location of, a Water Dependent Use

Policy: *CGS § 22a-93(17) Adverse impacts on future water-dependent development opportunities" and "adverse impacts on future water-dependent development activities" include but are not limited to (A) locating a non-water-dependent use at a site that (i) is physically suited for a water-dependent use for which there is a reasonable demand or (ii) has been identified for a water-dependent use in the plan of development of the municipality or the zoning regulations; (B) replacement of a water-dependent use with a non-water-dependent use, and (C) siting of a non-water-dependent use which would substantially reduce or inhibit existing public access to marine or tidal waters.*

Commentary and Analysis

A portion of the existing site use is a gravel parking area that does not support a water dependent use. The proposed museum will provide public access to and along and use of the waterfront in an area from which the public has been previously excluded. The maritime museum exhibits that document the history of the Coast Guard will include in-water displays and/or interactions. Although a portion of City Pier Plaza will be removed in work related to this project, the public access provided by that portion of pier will be replaced by the public plaza associated with the museum and enhanced by the continuum of access throughout the museum site.

5.0 SUMMARY OF FINDINGS

The proposed NCGM has been designed to maintain consistency with the Connecticut Coastal Management Act (CCMA) as described in Connecticut General Statutes Section 22a-90 through 22a-112 and thus achieve Federal coastal consistency. The primary resources on the subject property are comprised of developed shorefront and coastal hazard areas. Language in the CCMA stipulates eight adverse impacts that must be avoided in the course of site development. The following summarizes how these adverse impacts will be avoided to maintain consistency with the CCMA.

- 1) Degrading water quality through the significant introduction into either coastal waters or groundwater supplies of suspended solids, nutrients, toxics, heavy metals or pathogens, or through

the significant alteration of temperature, pH, dissolved oxygen or salinity [Connecticut General Statutes (CGS) section 22a-93(15)(A)].

The proposed project manages this potential adverse impact by employing modern and innovative stormwater management and best management practices during construction. The nature of the site redevelopment and long-term use of the property as a museum demonstrates a low potential to negatively impact water quality, provided stormwater management exists.

- 2) Degrading existing circulation patterns of coastal waters through the significant patterns of tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours [CGS section 22a-93(15)(B)].

The proposed project demonstrates a low potential to adversely impact circulation patterns. Modifications to the proposed shoreline will be limited to 3,270 square feet of currently open shoreline. No new stormwater outlets to the Thames River are proposed. The project will tie into the existing city storm sewer system located south of the project site.

- 3) Degrading natural erosion patterns through the significant alteration of littoral transport of sediments in terms of deposition or source reduction [CGS section 22a-93(15)(C)].

Significant alteration to littoral transport is not anticipated. The shoreline is currently largely occupied by a pile supported structure to the south and to the north, the short-length of open shoreline lies at a recessed westerly position compared to the seaward face of the plaza. This area contributes minimally to the overall sediment budget to the Thames River and thus, its conversion to a steel sheet piling condition is not anticipated to affect natural erosion patterns.

- 4) Degrading natural or existing drainage patterns through the significant alteration of groundwater flow and recharge and volume of runoff [CGS section 22a-93(15)(D)].

The volume of stormwater generated by the proposed project is essentially equal to the volume generated by existing impervious materials on the property. To this end, the proposed project is not anticipated to significantly alter natural and existing drainage patterns. No modifications are proposed that would impact groundwater flow or recharge.

- 5) Increasing the hazard of coastal flooding through significant alteration of shoreline configurations or bathymetry, particularly within high velocity flood zones [CGS section 22a-93(15)(E)].

The proposed project represents a minor alteration of shoreline configuration within a velocity zone. Due to the source of coastal flooding, this modification will not result in an increase in base flood elevation on the NCGM property or the surrounding localized area. The project is designed to not only meet but exceed NFIP standards. Additionally, the installation of a proposed pedestrian bridge by NCGMA adjacent to the northern face of the building will provide an elevated means of egress from the Thames River floodplain.

- 6) Degrading visual quality through significant alteration of the natural features of vistas and viewpoints [CGS section 22a-93(15)(F)].

The proposed NCGM will be constructed within a developed landscape. Impacts to vistas or viewpoints will not be significant. An elevated viewing platform is proposed at the eastern extent of the pedestrian access walkway that will allow for access to vistas and viewpoints of the Thames River not currently realized by the existing shoreline construct. The addition of this feature provides an appreciable improvement to public access of the shoreline, which is anticipated to provide additional public viewing opportunities.

- 7) *Degrading or destroying essential wildlife, finfish or shellfish habitat through significant alteration of the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significant alteration of the natural components of the habitat [CGS section 22a-93(15)(G)].*

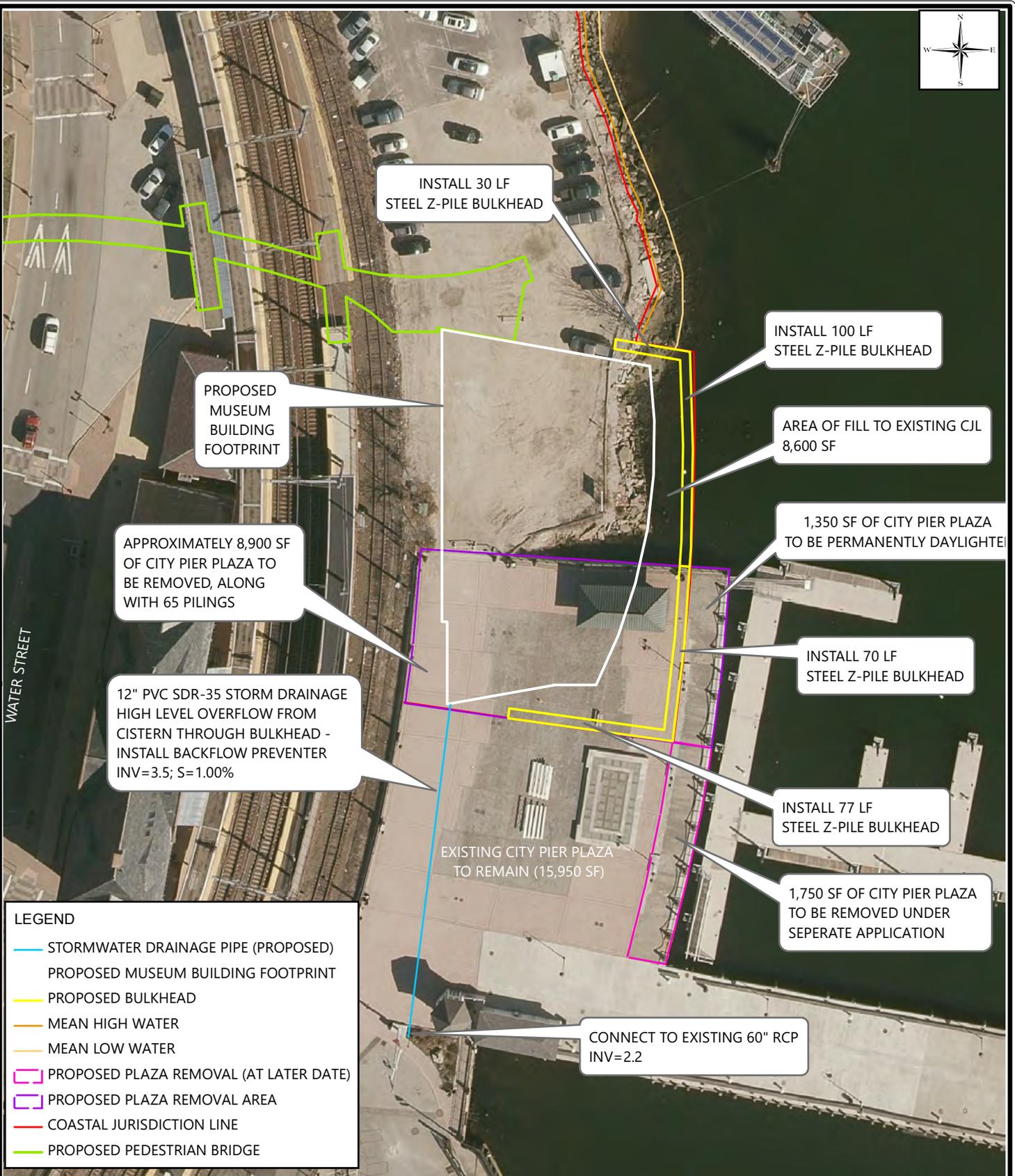
The proposed NCGM project involves direct fill of 8,600 SF of land that is located seaward of the HTL/CJL. The majority of this fill area is currently covered with the pile-supported City Pier Plaza. The shoreline reconfiguration will lie approximately 19 feet west of the current extent of City Pier Plaza. To achieve this, approximately 3,100 square feet of the plaza are proposed to be daylighted enhancing the opportunity for natural restoration of habitat and recruitment of endemic species. These shoreline modifications are limited spatially and are not expected to adversely impact population dynamics within the Thames River food web. The installation of the bulkhead may provide an additional habitat niche as well. A number of studies have demonstrated that fauna associated with pilings and permanent in-water structures provide a substantial percentage of the food content for cunners and blackfish (Steimle and Ogren, 1982).

- 8) *Degrading tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments through significant alteration of their natural characteristics or function [CGS section 22a-93(15)(H)].*

No tidal wetlands, beaches or dunes, rocky shorefront, bluffs or escarpments are located on the subject site. Coastal resources affected by the project include developed shorefront and coastal hazard area. Due to the proximity of the subject site to tidal wetlands, rocky shorefront, beaches and dunes and bluffs or escarpments, there is minimal potential for the project adversely impacts these resources.

Conclusion

The proposed project will result in minor shoreline modifications to the Thames River to accommodate construction of the National Coast Guard Museum. The project has been designed to minimize adverse impacts to adjacent coastal resources in the short and long term through the use of best construction practices during construction, stormwater management, and consistency with NFIP regulations. The project employs innovative techniques in shoreline design to effectively balance removal of existing structures with proposed structures thus limiting the footprint of direct Thames River disturbance. In light of the forgoing analysis, the USCG finds that this project is consistent to the maximum extent practicable with the enforceable policies of the CZMA and the CCMA.



LEGEND

- STORMWATER DRAINAGE PIPE (PROPOSED)
- PROPOSED MUSEUM BUILDING FOOTPRINT
- PROPOSED BULKHEAD
- MEAN HIGH WATER
- MEAN LOW WATER
- PROPOSED PLAZA REMOVAL (AT LATER DATE)
- PROPOSED PLAZA REMOVAL AREA
- COASTAL JURISDICTION LINE
- PROPOSED PEDESTRIAN BRIDGE



99 Realty Drive
Cheshire, Connecticut 06410
(203) 271-1773
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PROPOSED CONDITIONS

NATIONAL COAST GUARD MUSEUM

MAP G12 / BLOCK 108 / LOT 1.0 / UNIT 1
NEW LONDON, CONNECTICUT

SOURCE: 2016, CT DEEP ORTHOIMAGERY

DATE: 02 NOVEMBER 2018

SCALE: 1" = 60'

PROJ. NO.: 5139-01

DESIGNED MBR	DRAWN KFK	CHECKED MBR
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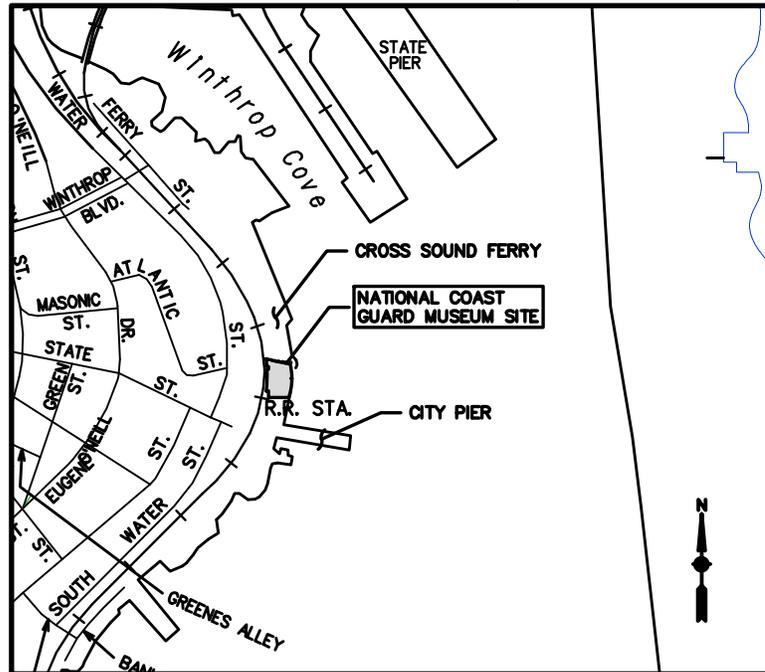
FIG. 1

NATIONAL COAST GUARD MUSEUM

NEW LONDON, CONNECTICUT
 COASTAL 401 WATER QUALITY CERTIFICATION
 OCTOBER 2018
 REVISED: DECEMBER 21, 2018

NOTES:

1. NAVD 88 DATUM
2. MHW = 1.8' (NGVD 29), 0.9' (NAVD 88)
 MLW = -0.9' (NGVD 29), -1.7' (NAVD 88)
 CJL = 3.10' (NGVD 29), 2.10' (NAVD 88)
3. TOPOGRAPHY AND PLANIMETRIC FEATURES ARE FROM FIELD SURVEY PREPARED BY MILONE AND MACBROOM, INC.



PROJECT VICINITY MAP
 NOT TO SCALE

LIST OF DRAWINGS:

- 1 TITLE SHEET WITH LOCATION MAP
- 2 PARCEL MAP
- 3 SITE PLAN - EXISTING CONDITIONS
- 4 SITE PLAN - EXISTING CONDITIONS
- 5 SITE PLAN - PROPOSED CONDITIONS
- 6 SECTION A-A
- 7 SECTION B-B
- 8 BREAKAWAY CURTAIN WALL
- 9 TURBIDITY CURTAIN/OIL BOOM
- 10 DIRTBAG PUMPED SILT CONTROL SYSTEM
- 11 PIPE CONNECTION TO EXISTING 60" RCP

LEGEND

	EDGE OF WATER
	MAJOR CONTOUR
	MINOR CONTOUR
	TREE LINE
	UTILITY POLE
	PILING

PREPARED FOR:

NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.
 321 ST. CHARLES AVENUE 10TH FLOOR
 NEW ORLEANS, LOUISIANA 70130
 BUSINESS PHONE: 860-443-4200



80 REALTY DRIVE
 GREENWICH, CT 06860
 203.571.7778
 WWW.MMINC.COM

NATIONAL COAST GUARD MUSEUM

ON: THAMES RIVER
 AT: NEW LONDON, CT

TITLE SHEET

LOCATION
 MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

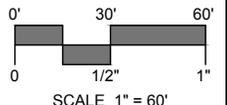
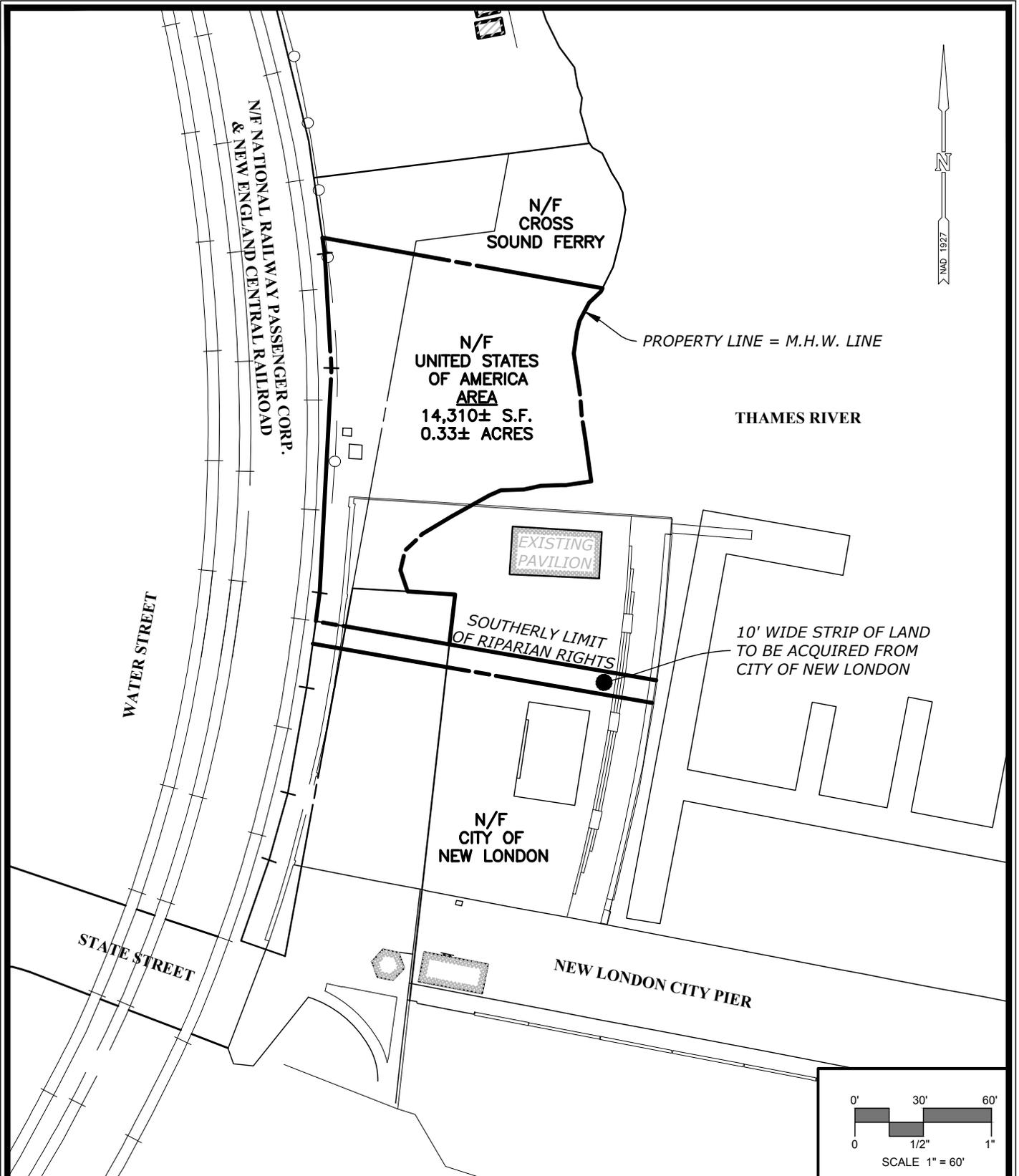
DATE **OCTOBER 15, 2018**
 SCALE **NONE**
 PROJ. NO. **5139-01**

SHEET

01

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Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



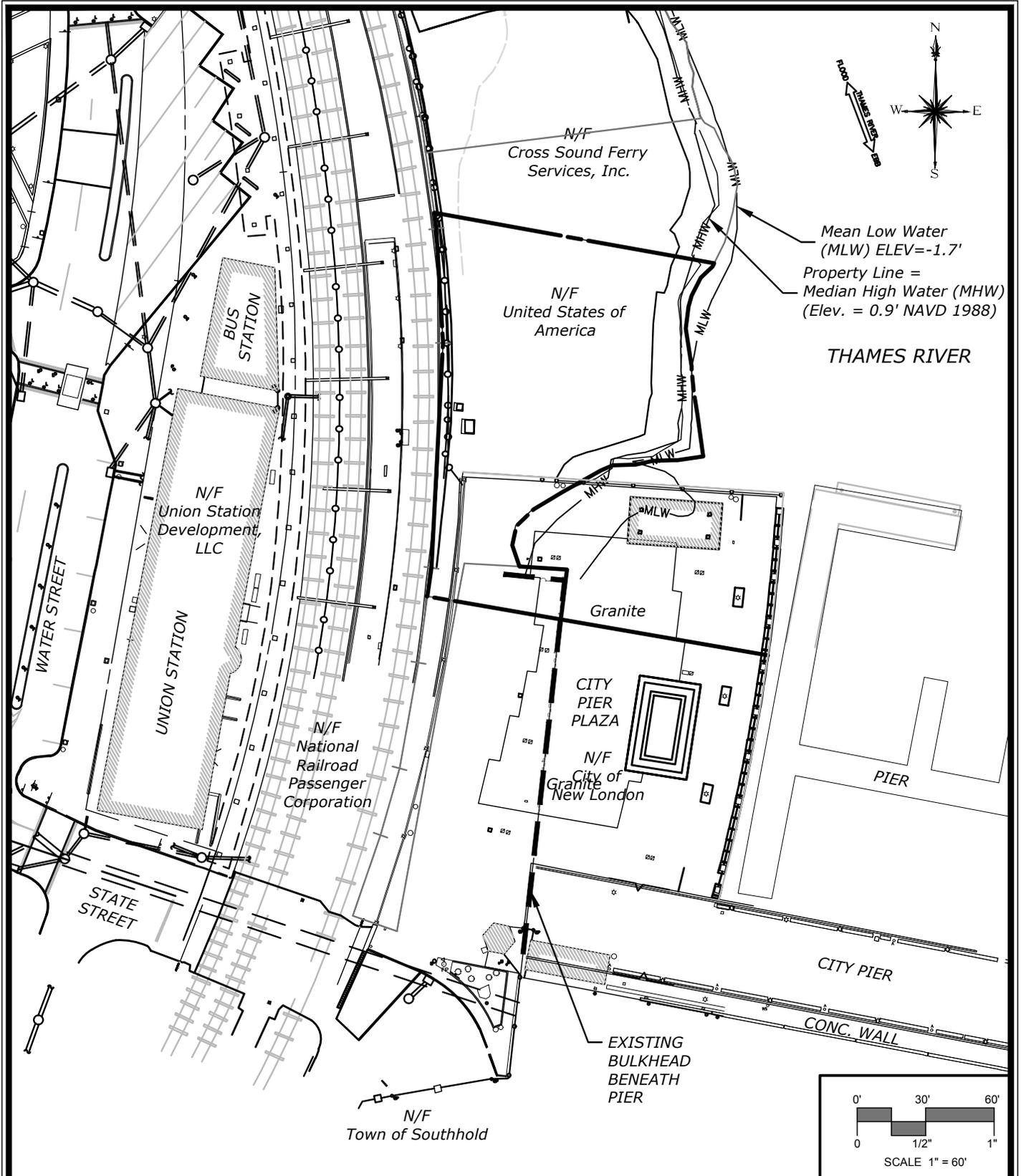
PARCEL MAP
NATIONAL COAST GUARD MUSEUM
 MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: **FOR PERMITTING** REV: ---

DATE OCTOBER 15, 2018		
SCALE 1" = 60'		
PROJ. NO. 5139-01		
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Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



80 REALTY DRIVE
CHEBINE, CT 06410
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SITE PLAN - EXISTING CONDITIONS

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **OCTOBER 15, 2018**

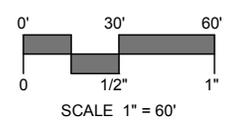
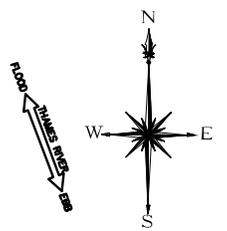
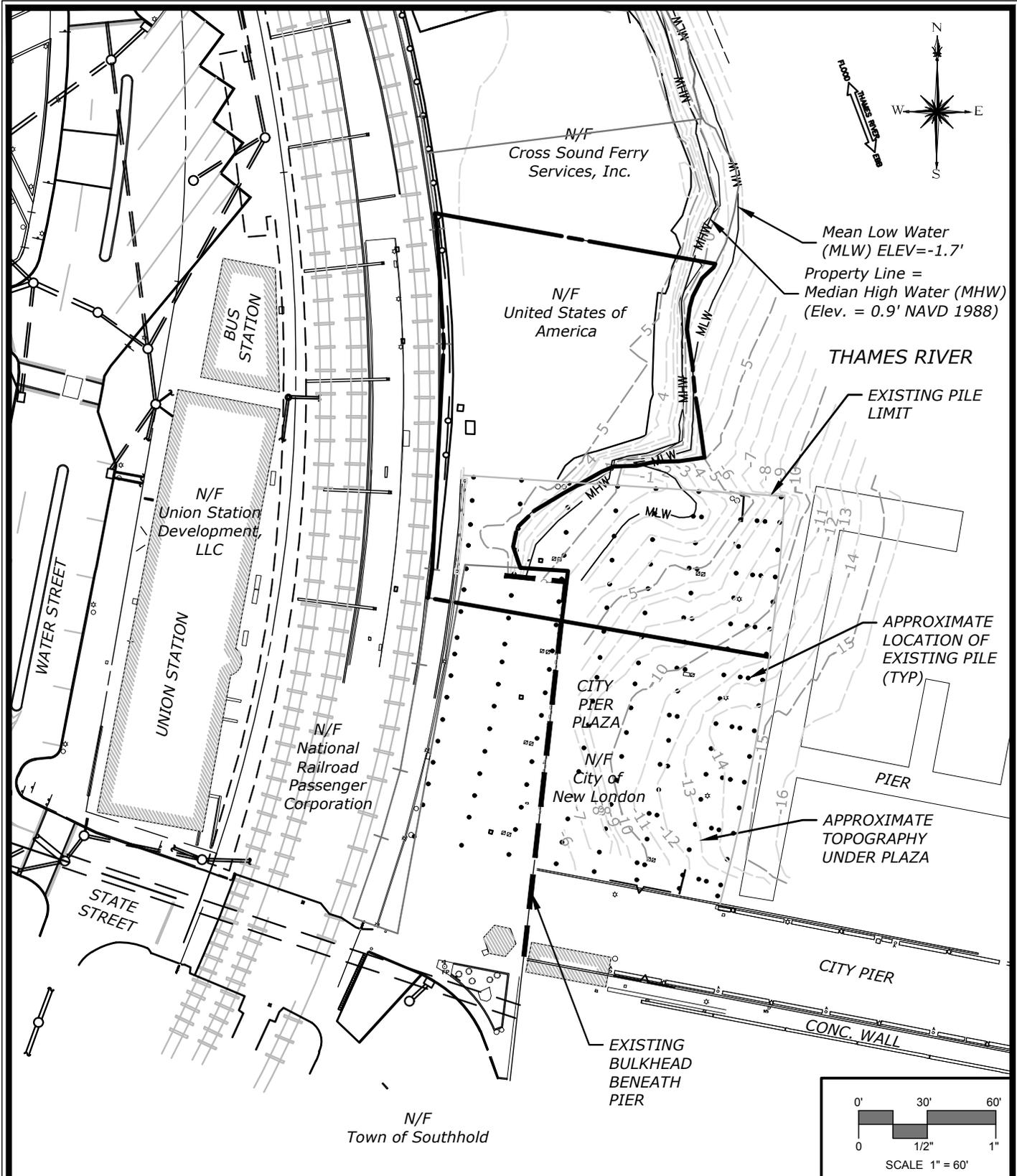
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PROJ. NO. **5139-01**

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DRAWING NAME:

03



SITE PLAN - EXISTING CONDITIONS

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/ 1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

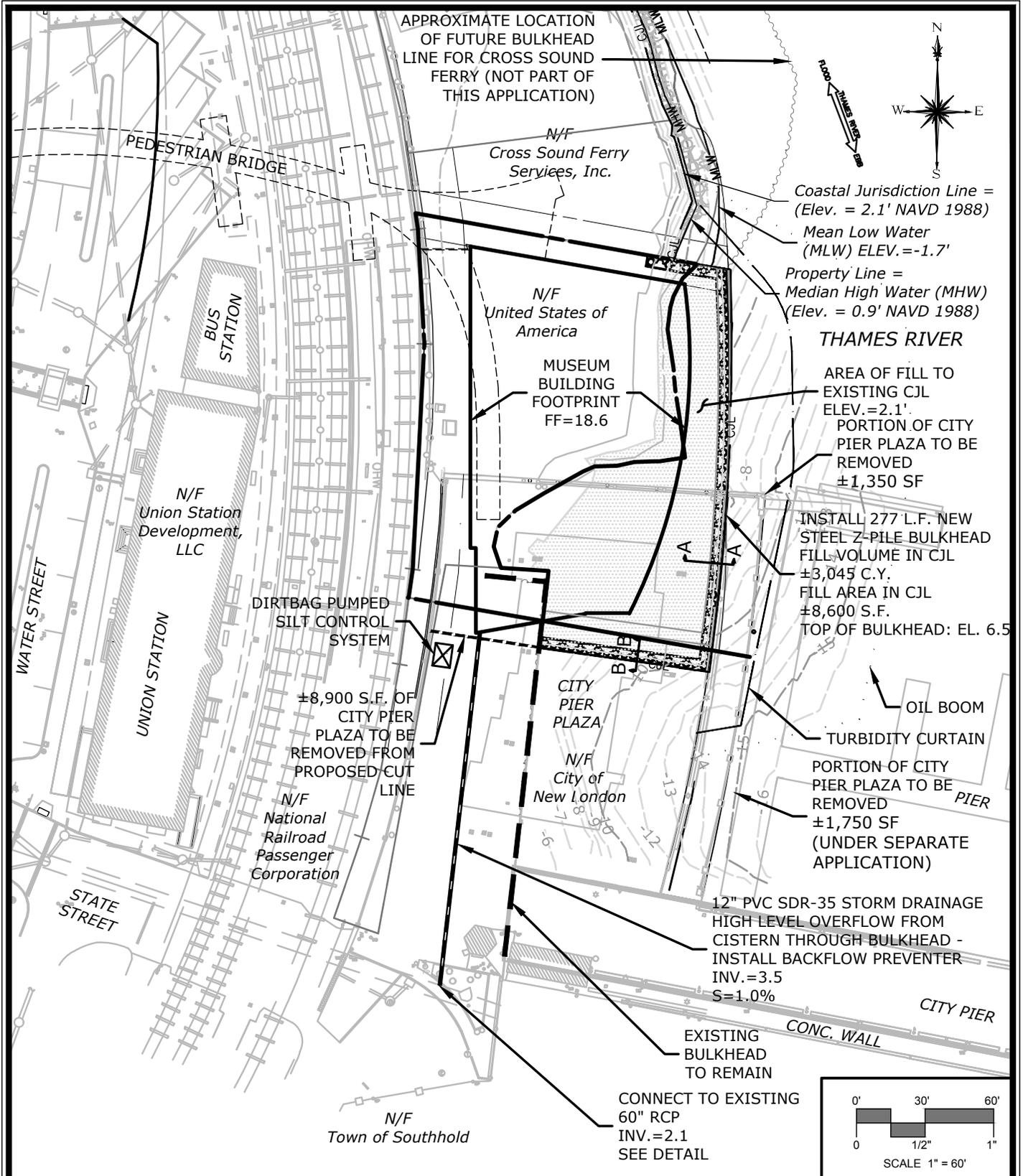
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PROJ. NO. 5139-01		
DESIGNED RE	DRAWN TT	CHECKED TD
DRAWING NAME: 04		

MILONE & MACBROOM

90 REALTY DRIVE
 CHEBUNKER, CT 06400
 203.271.7779
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Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



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MILONE & MACBROOM
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 203.271.7779
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SITE PLAN - PROPOSED CONDITIONS

NATIONAL COAST GUARD MUSEUM

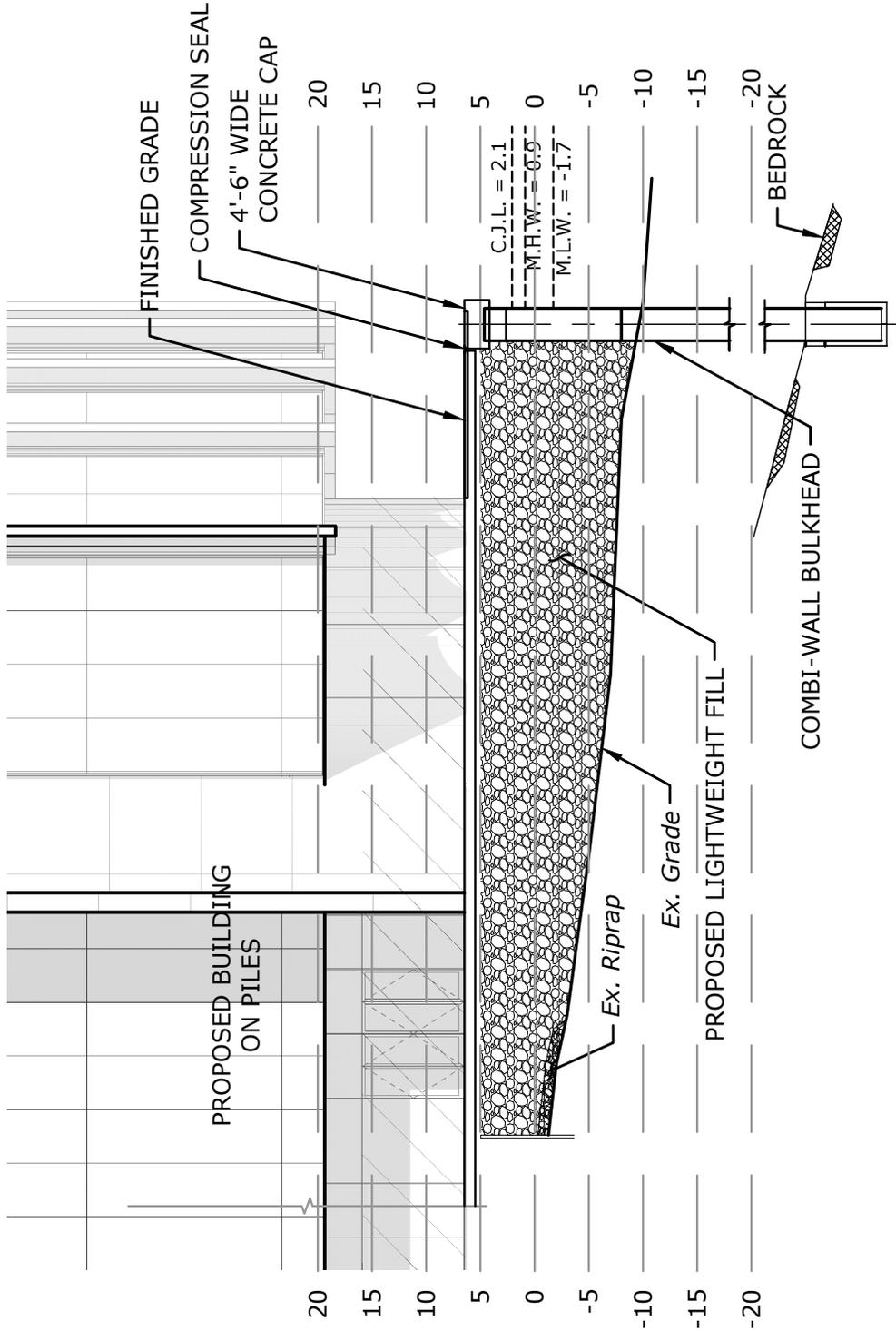
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 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: 12/21/2018

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PROJ. NO.	5139-01		
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05



SECTION A-A



80 REALTY DRIVE
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SECTION A-A

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV:

DATE: OCTOBER 15, 2018

SCALE: 1/16" = 1'-0"

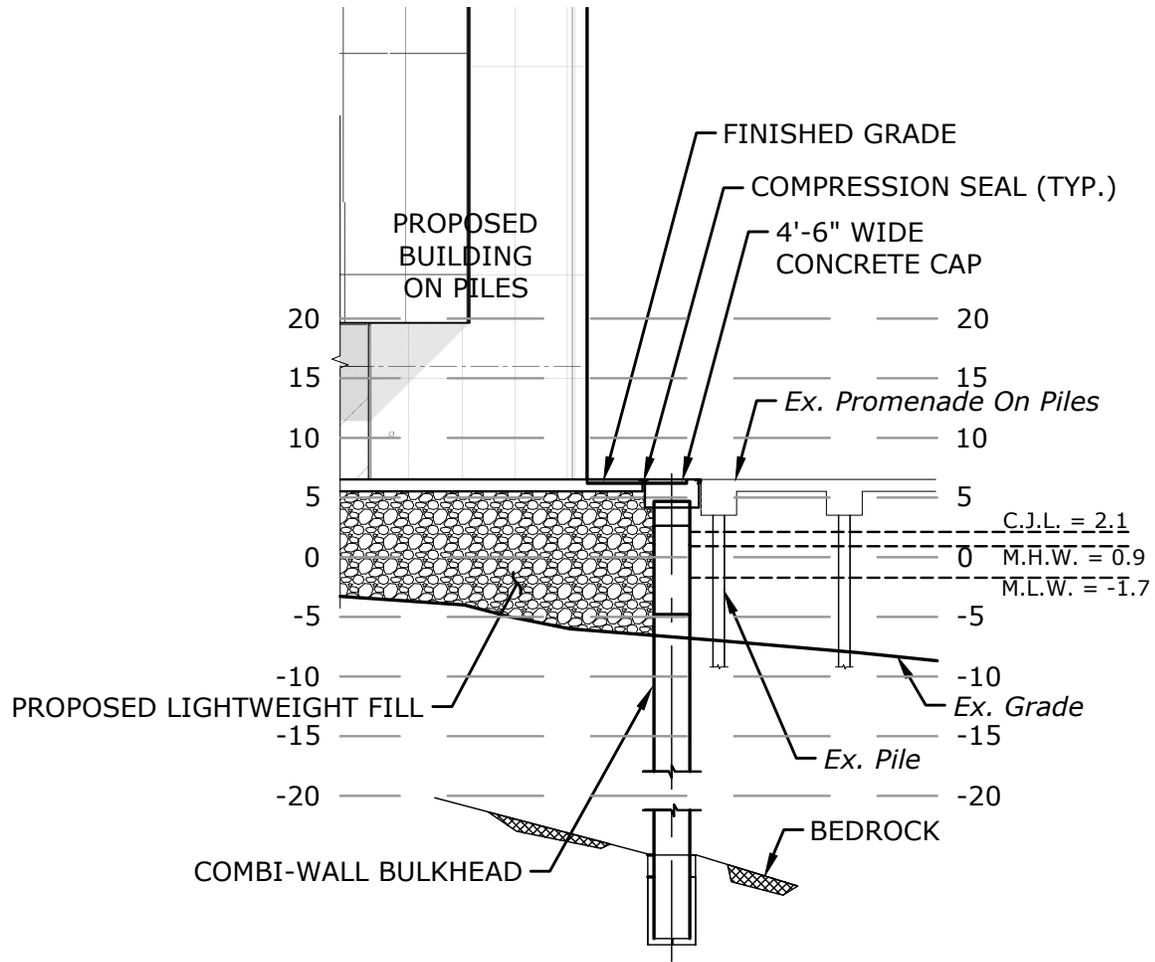
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DESIGNED KP	DRAWN NP	CHECKED KP
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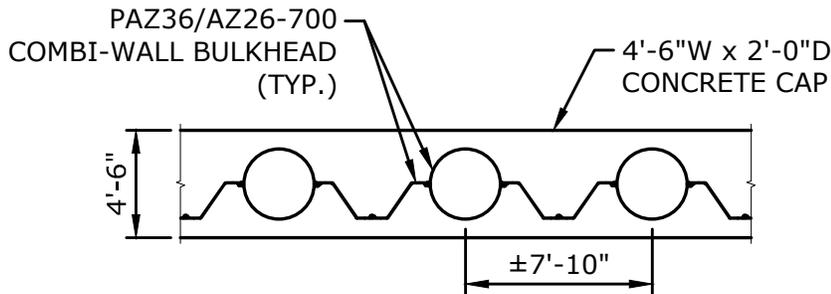
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06

Drawing: V:\DESIGN\5139-01-DE\CAD\DETAILS\PERMIT SET\DETAILS\SECTION B--B.DWG Layout Tab:8:5X11V



SECTION B-B



STEEL BULKHEAD - PLAN

SCALE: 1/8" = 1'-0"



SECTION B-B

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE: OCTOBER 15, 2018

SCALE: 1" = 60'

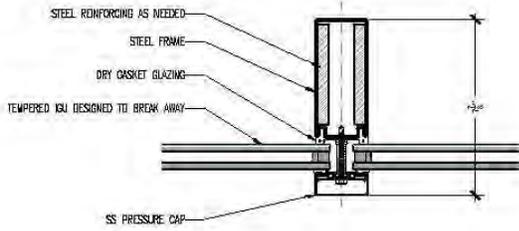
PROJ. NO. 5139-01

DESIGNED KP	DRAWN NP	CHECKED KP
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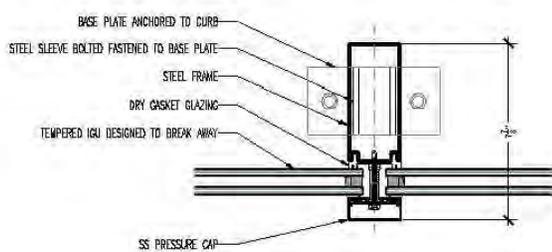
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07

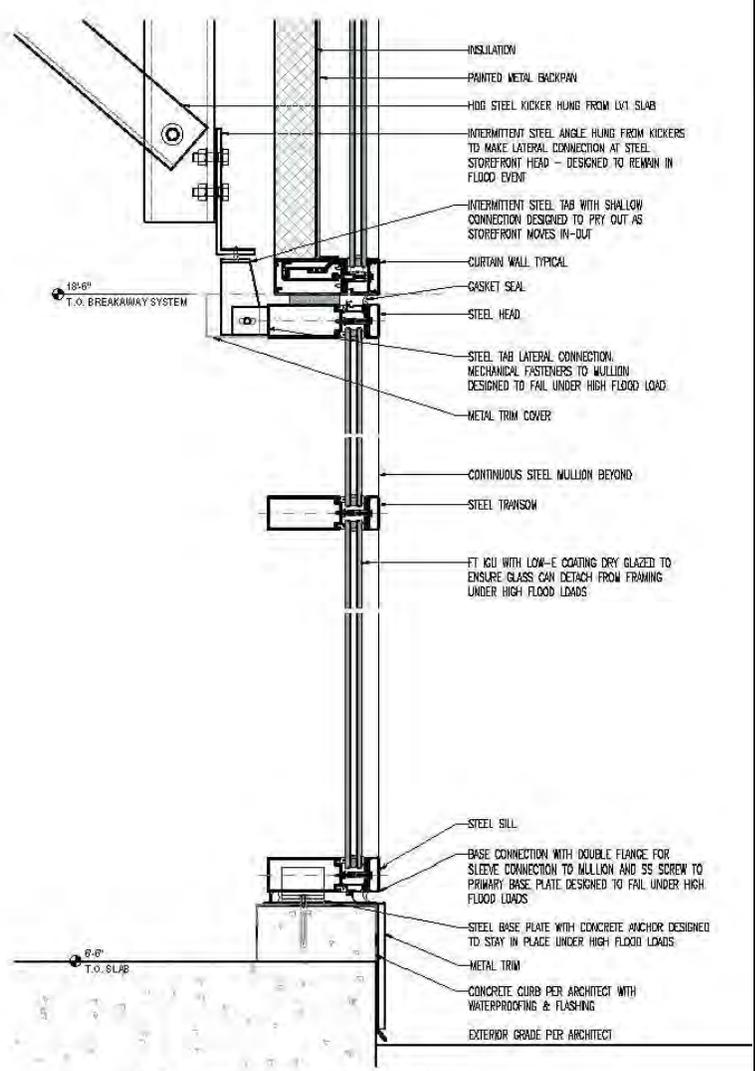
Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



3 PODIUM SF MULLION - TYPICAL
PLAN [SCALE 1:10]



2 PODIUM SF MULLION - BASE CONNECTION
PLAN [SCALE 1:10]



1 PODIUM BREAKAWAY STOREFRONT
SECTION [SCALE 1:16]

NOTE:
BREAKAWAY CURTAINWALL DETAIL IS TYPICAL
AT MUSEUM BUILDING AND PEDESTRIAN BRIDGE
STAIR ENCLOSURE AT GRADE.



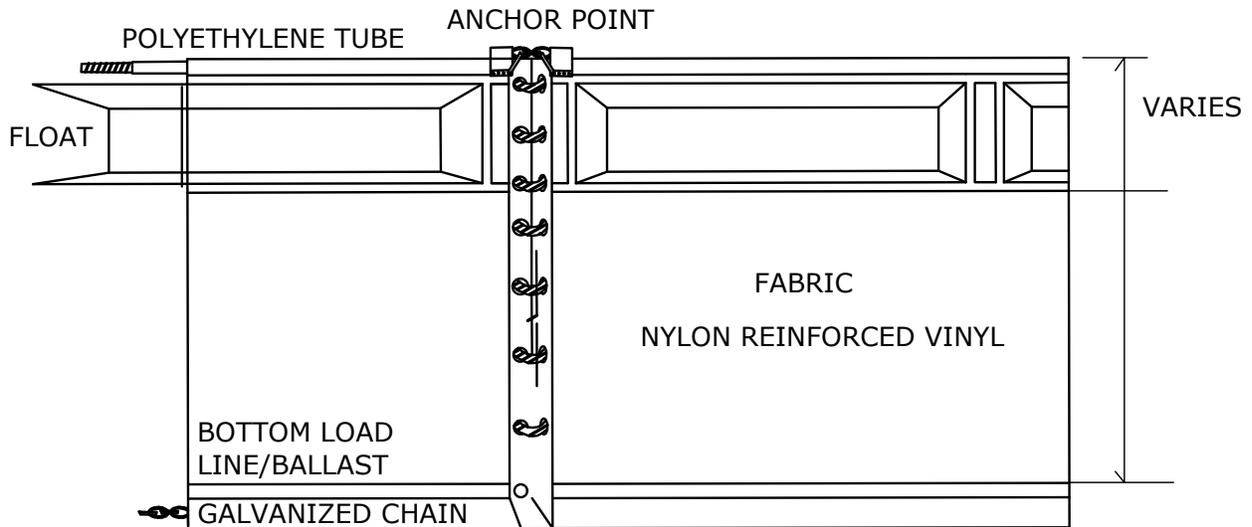
BREAKAWAY CURTAIN WALL
NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

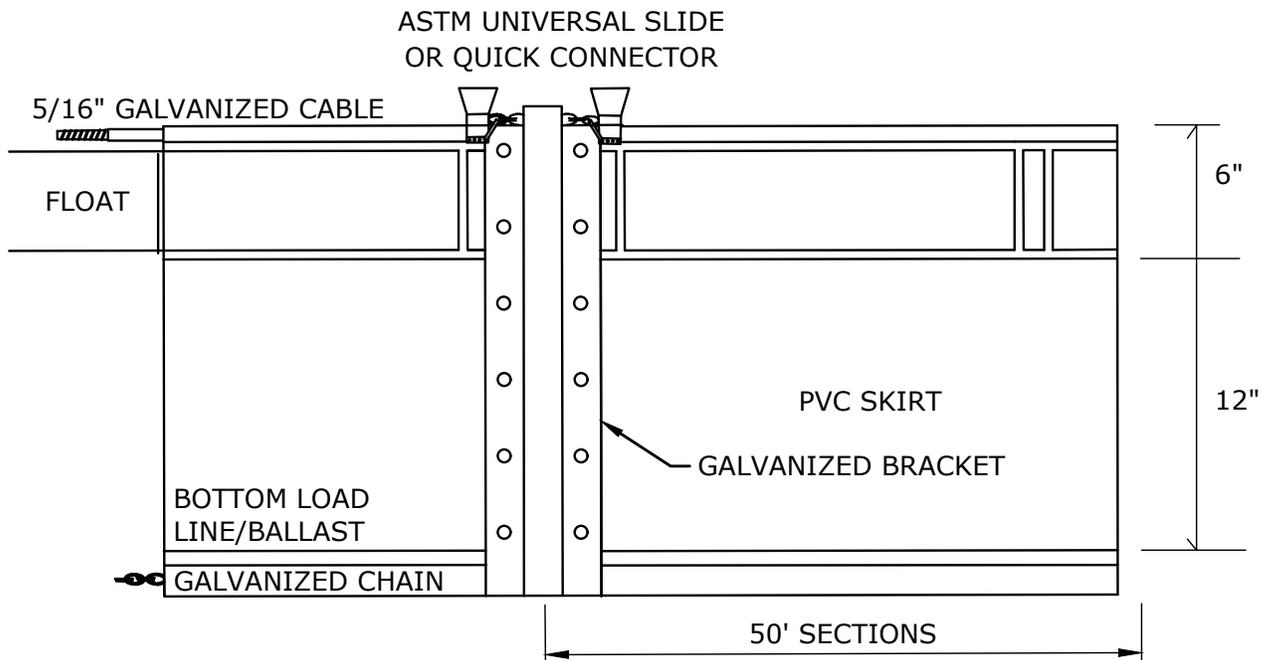
REV: ---

DATE OCTOBER 15, 2018		
SCALE NOT TO SCALE		
PROJ. NO. 5139-01		
DESIGNED RE	DRAWN TT	CHECKED TD
DRAWING NAME: 08		



TURBIDITY CURTAIN

NOT TO SCALE



OIL BOOM

NOT TO SCALE

Drawing: V:\DESIGN\5139-01-DE\CAD\COM-ENVIRONMENTAL PERMIT SHEETS\DWG Layout TURBIDITY CURTAIN

Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



**MILONE &
MACBROOM**
80 REALTY DRIVE
CHESTER, CT 06410
203.271.7779
WWW.MMBC.COM

TURBIDITY CURTAIN/OIL BOOM

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **OCTOBER 15, 2018**

SCALE **NOT TO SCALE**

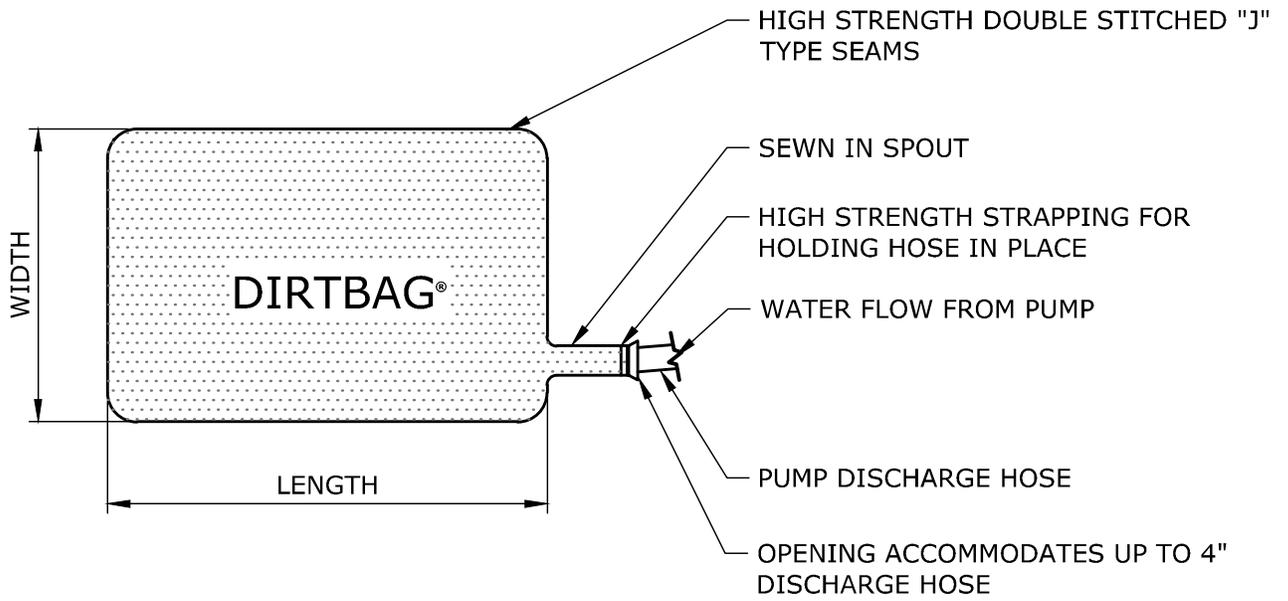
PROJ. NO. **5139-01**

DESIGNED RE	DRAWN TT	CHECKED TD
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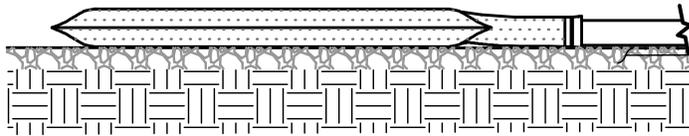
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09

Drawing: V:\DESIGN\5139-01-DE\CAD\CAD-ENVIRONMENTAL PERMIT SHEETS\DWG Layout TopDENWATERING



TOP VIEW



SIDE VIEW

DIRTBAG PUMPED SILT CONTROL SYSTEM

NOT TO SCALE

Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



DIRTBAG PUMPED SILT CONTROL SYSTEM

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **OCTOBER 15, 2018**

SCALE **NOT TO SCALE**

PROJ. NO. **5139-01**

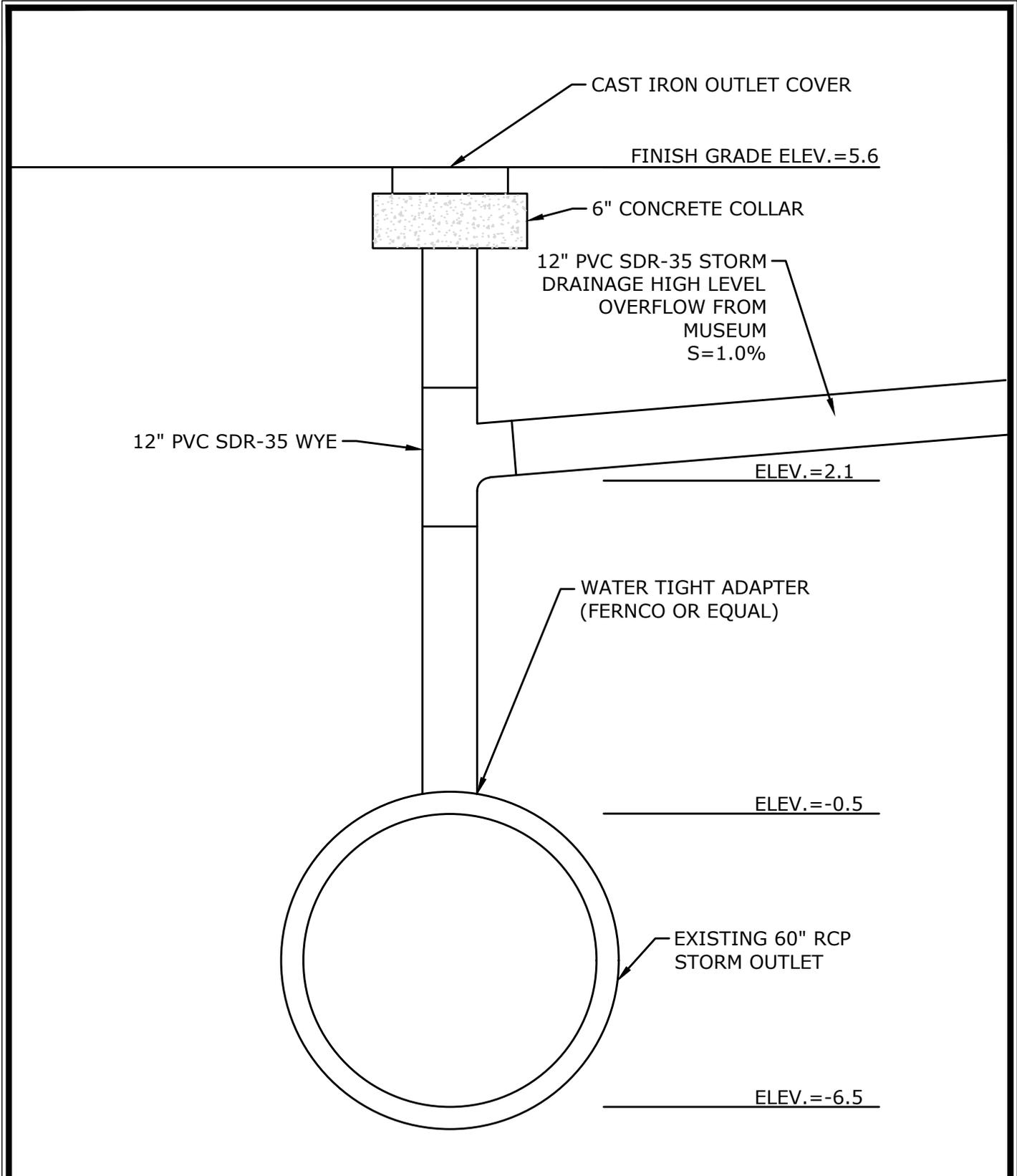
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DRAWING NAME:

10

Drawing: V:\DESIGN\5139-01-DE\CAD\CAD-COM-ENVIRONMENTAL PERMIT SHEETS\DWG Layout Tab\CONNECTION

Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



PIPE CONNECTION TO EXISTING 60" RCP

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **OCTOBER 15, 2018**

SCALE **NOT TO SCALE**

PROJ. NO. **5139-01**

DESIGNED RE	DRAWN TT	CHECKED TD
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DRAWING NAME:

11

APPENDIX B2

CT DEEP CONCURRENCE DETERMINATION



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

Date: August 24, 2021

Andrew Haley, Chief, Office of Environmental Management
United States Coast Guard
2703 Martin Luther King Jr. Avenue SE, Stop 7714
Washington, DC 20591-7103

RE: Federal Coastal Consistency #201913666-FCC
Coast Guard Museum, New London

Dear Mr. Haley:

The Department of Energy & Environmental Protection (“Department”) has reviewed your request for federal consistency concurrence to construct an approximately 80,000 square foot building to serve as the National Coast Guard Museum on property that is located off Water Street in New London, CT pursuant to section 307(c)(1) of the Coastal Zone Management Act of 1972, as amended, and Subpart C of 15 Code of Federal Regulations (“CFR”), Part 930. Specifically, as described in the submitted application and shown on the enclosed thirteen (13) sheets of plans prepared by Milone & MacBroom for the United States Coast Guard. Based on a review of the proposed activities as indicated on the plans and described on the revised application materials received by the Department on May 24, 2021, we concur with your determination that the activity as proposed is consistent with Connecticut’s federally approved Coastal Management Program and will be conducted in a manner consistent with that program.

Please be aware that construction of the proposed National Coast Guard Museum is contingent upon receiving approval for #20207398-SDFWQC which seeks approval to remove existing structures, install a steel sheetpile bulkhead and placement of fill material landward of the bulkhead.

Please be advised that any subsequent modifications to the proposed activity, regardless of their magnitude or impact, constitute a new application for the purposes of federal consistency certification. Accordingly, all such modifications must be submitted to this Department for a coastal consistency concurrence pursuant to 15 CFR 930.50.

Thank you for providing a consistency determination and supporting information for our review. Should you have any questions regarding this consistency determination please contact Micheal Grzywinski in the Land & Water Resources Division at 860-424-3674 or micheal.grzywinski@ct.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. P. Thompson", with a long horizontal flourish extending to the right.

Brian P. Thompson, Director
Land & Water Resources Division
Bureau of Water Protection & Land Reuse

Enclosures: Thirteen (13) sheets of plans

cc: Andrew Haley, US Coast Guard, Andrew.s.haley@uscg.mil
RW Pulver, National Coast Guard Museum Association, rwpulver@coastguardmuseum.org
Elizabeth Varner, US Coast Guard, Elizabeth.C.Varner@uscg.mil
Joshua Folckemer, US Coast Guard, Joshua.D.Folckemer@uscg.mil
Andrew Wright, US Coast Guard, Andrew.J.Wright@uscg.mil
Jeanine Armstrong Gouin, SLR Consulting, jgouin@slrconsulting.com
Megan Raymond, SLR Consulting, mraymond@slrconsulting.com
Jane Stahl, jkstahl@comcast.net

Diane Ray, ACOE, Diane.M.Ray@usace.army.mil
Michael Passero, New London Mayor, mpassero@newlondonct.org
Allison Castellan, NOAA, Allison.castellan@noaa.gov
Robert Fromer, saintrobert@comcast.net
File #201913666-FCC, New London

NATIONAL COAST GUARD MUSEUM

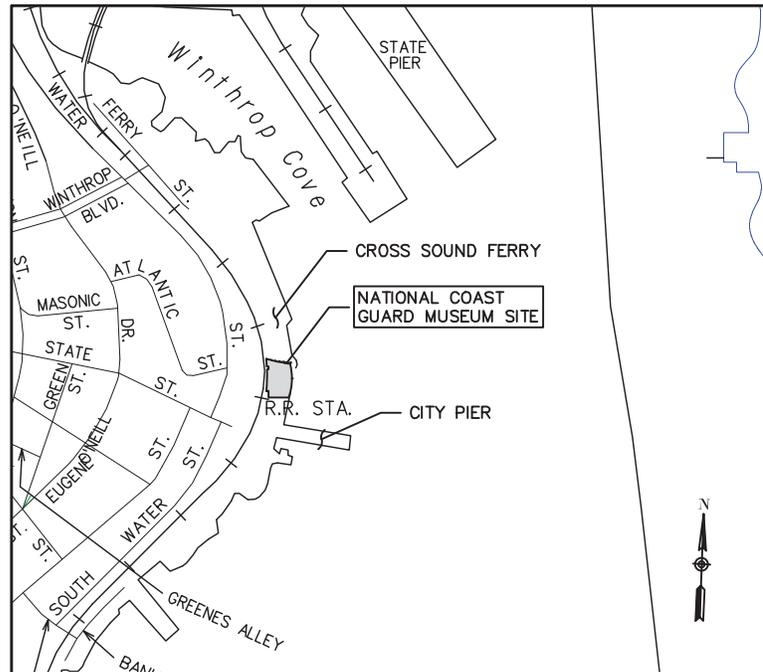
NEW LONDON, CONNECTICUT

401 WATER QUALITY CERTIFICATION AND STRUCTURES, DREDGING & FILL PERMIT APPLICATION

JUNE 2020

NOTES:

1. NAVD 88 DATUM
2. MHW = 1.8' (NGVD 29), 0.9' (NAVD 88)
MLW = -0.9' (NGVD 29), -1.7' (NAVD 88)
CJL = 3.10' (NGVD 29), 2.10' (NAVD 88)
3. TOPOGRAPHY AND PLANIMETRIC FEATURES ARE FROM FIELD SURVEY PREPARED BY MILONE AND MACBROOM, INC.



PROJECT VICINITY MAP
NOT TO SCALE

LEGEND

	EDGE OF WATER
	MAJOR CONTOUR
	MINOR CONTOUR
	TREE LINE
	UTILITY POLE
	PILING

LIST OF DRAWINGS:

- 1 TITLE SHEET WITH LOCATION MAP
- 2 PARCEL MAP
- 3 SITE PLAN - EXISTING CONDITIONS
- 4 SITE PLAN - EXISTING CONDITIONS
- 5 SITE PLAN - PROPOSED CONDITIONS
- 6 SEDIMENT AND EROSION CONTROL PLAN
- 7 SECTION A-A
- 8 SECTION B-B
- 9 MUSEUM SECTION VIEW
- 10 BREAKAWAY CURTAIN WALL
- 11 TURBIDITY CURTAIN/OIL BOOM
- 12 DIRTBAG PUMPED SILT CONTROL SYSTEM
- 13 PIPE CONNECTION TO EXISTING 60" RCP

PREPARED FOR:

NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.
78 HOWARD STREET
SUITE A
NEW LONDON, CT 06320
BUSINESS PHONE: 860-443-4200

SEAL AND SIGNATURE

Kishor Patel



P.E. CT# 23980



89 REALTY DRIVE
GREENWICH, CT 06430
203.571.7778
WWW.MMINC.COM

NATIONAL COAST GUARD MUSEUM

ON: THAMES RIVER
AT: NEW LONDON, CT

TITLE SHEET

LOCATION
MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

DATE **JUNE 2020**
SCALE **NONE**
PROJ. NO. **5499-05**

SHEET

01



N/F NATIONAL RAILWAY PASSENGER CORP.
& NEW ENGLAND CENTRAL RAILROAD

N/F CROSS
SOUND FERRY

N/F UNITED STATES
OF AMERICA
AREA
14,310± S.F.
0.33± ACRES

PROPERTY LINE = M.H.W. LINE

THAMES RIVER

WATER STREET

EXISTING
PAVILION

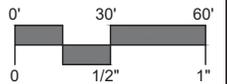
SOUTHERLY LIMIT
OF RIPARIAN RIGHTS

10' WIDE STRIP OF LAND
TO BE ACQUIRED FROM
CITY OF NEW LONDON

N/F CITY OF
NEW LONDON

STATE STREET

NEW LONDON CITY PIER



SCALE 1" = 60'



80 REALTY DRIVE
CHEBHING, CT 06410
203.271.7779
WWW.MMNB.COM

PARCEL MAP
NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT REV: ---

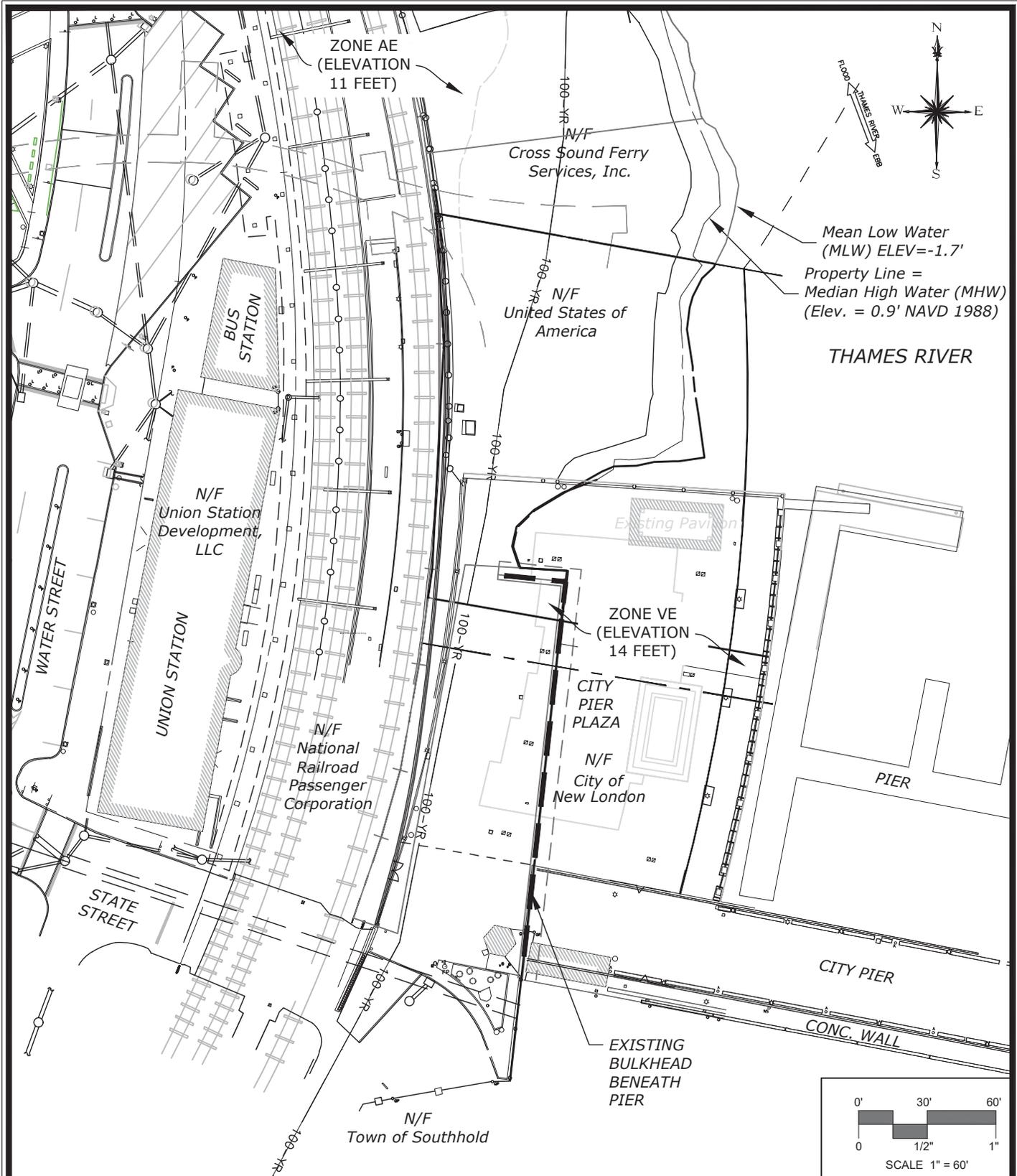
DATE JUNE 2020		
SCALE 1" = 60'		
PROJ. NO. 5499-05		
DESIGNED RE	DRAWN TT	CHECKED TD

DRAWING NAME:

02

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Plotted by: SIKARAR On this date: Tue, 2020 June 2 - 10:39am



Drawing: V:\DESIGN\5139-01-DE\CAD\CAD-ENVIRONMENTAL PERMIT SHEETS\DWG Layout Table\EXP.DWG

Plotted by: SIKARAR On this date: Tue, 2020 June 2 - 10:39am



80 REALTY DRIVE
CHEBINE, CT 06400
203.271.7779
WWW.MMBC.COM

SITE PLAN - EXISTING CONDITIONS

NATIONAL COAST GUARD MUSEUM

**MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT**

PROJECT PHASE: **ENVIRONMENTAL PERMIT**

REV: ---

DATE **JUNE 2020**

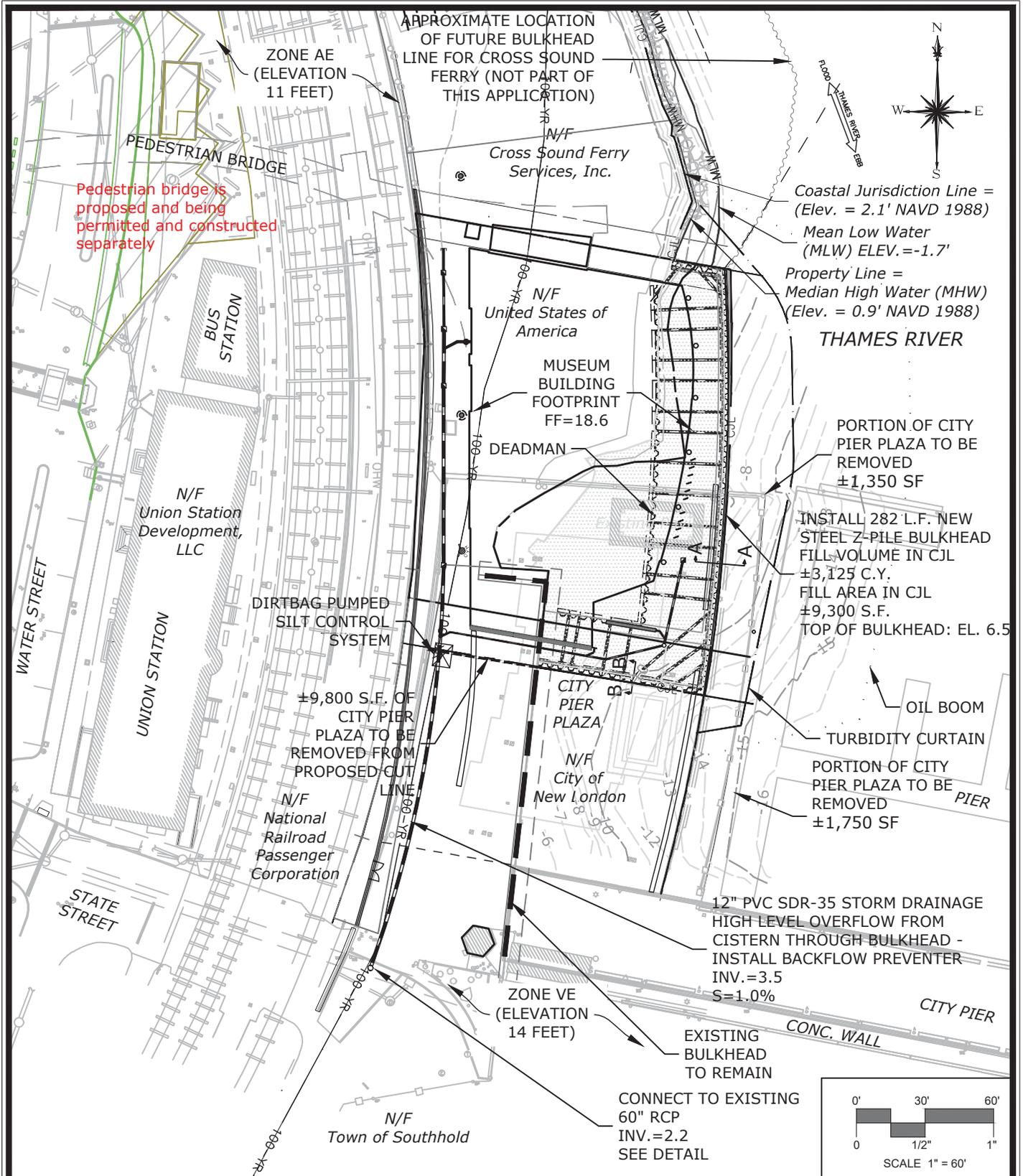
SCALE **1" = 60'**

PROJ. NO. **5499-05**

DESIGNED RE	DRAWN TT	CHECKED TD
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DRAWING NAME:

03



Pedestrian bridge is proposed and being permitted and constructed separately

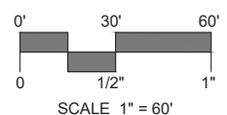
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 Mean Low Water (MLW) ELEV. = -1.7'
 Property Line = Median High Water (MHW) (Elev. = 0.9' NAVD 1988)
THAMES RIVER

PORTION OF CITY PIER PLAZA TO BE REMOVED ±1,350 SF
 INSTALL 282 L.F. NEW STEEL Z-PILE BULKHEAD
 FILL VOLUME IN CJL ±3,125 C.Y.
 FILL AREA IN CJL ±9,300 S.F.
 TOP OF BULKHEAD: EL. 6.5

PORTION OF CITY PIER PLAZA TO BE REMOVED ±1,750 SF

12" PVC SDR-35 STORM DRAINAGE HIGH LEVEL OVERFLOW FROM CISTERN THROUGH BULKHEAD - INSTALL BACKFLOW PREVENTER
 INV.=3.5
 S=1.0%

CONNECT TO EXISTING 60" RCP
 INV.=2.2
 SEE DETAIL



SITE PLAN - PROPOSED CONDITIONS

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV:

DATE JUNE 2020		
SCALE 1" = 60'		
PROJ. NO. 5499-05		
DESIGNED RE	DRAWN TT	CHECKED TD
DRAWING NAME:		

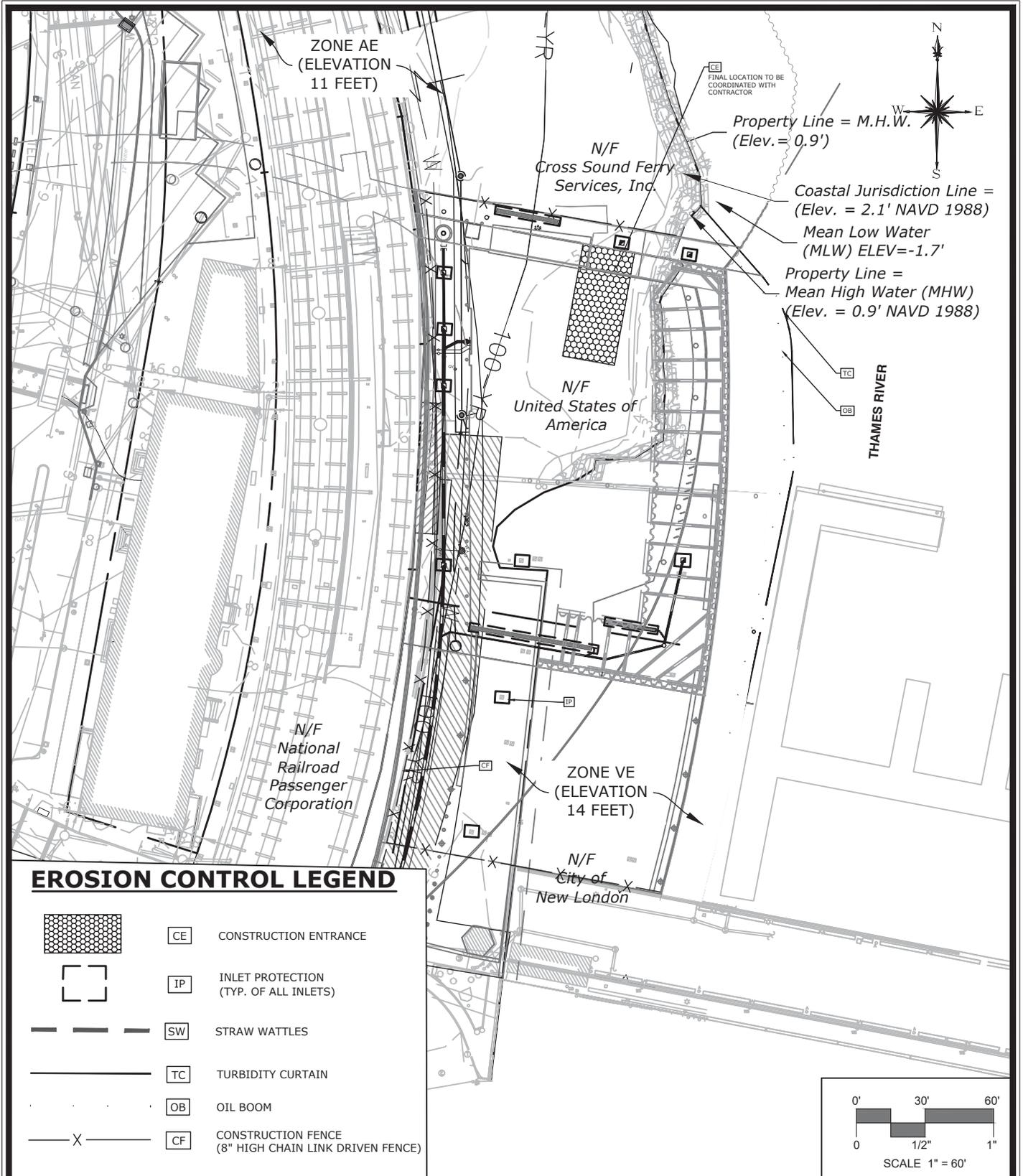
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60 REALTY DRIVE
 CHESTER, CT 06410
 203.371.7773
 WWW.MMING.COM

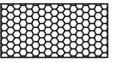
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Drawing: V:\DESIGN\5139-01-DE\CAD\CAD-SE\DWG Layout Tab\FRCONDV

Plotted by: SIKARAR On this date: Tue, 2020 June 2 - 10:40am



EROSION CONTROL LEGEND

-  **CE** CONSTRUCTION ENTRANCE
-  **IP** INLET PROTECTION (TYP. OF ALL INLETS)
-  **SW** STRAW WATTLES
-  **TC** TURBIDITY CURTAIN
-  **OB** OIL BOOM
-  **CF** CONSTRUCTION FENCE (8' HIGH CHAIN LINK DRIVEN FENCE)

SEDIMENT AND EROSION CONTROL PLAN

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

DATE **JUNE 2020**

SCALE **1" = 60'**

PROJ. NO. **5499-05**

DESIGNED RE	DRAWN TT	CHECKED TD
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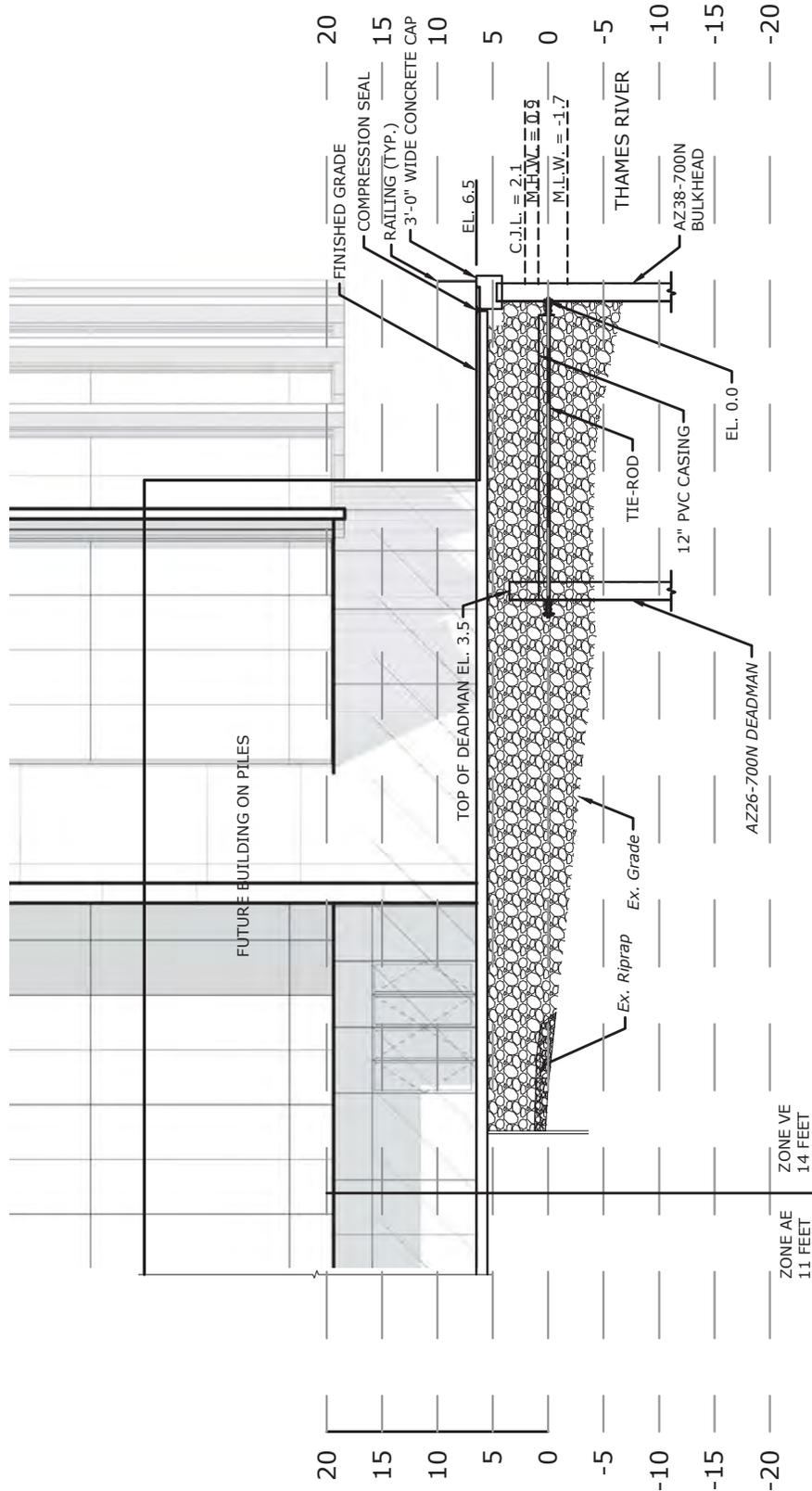
DRAWING NAME:

06



80 REALTY DRIVE
 CHESTER, CT 06410
 203.371.7773
 WWW.MMING.COM

REV:



SECTION A-A
NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: 7/23/2019



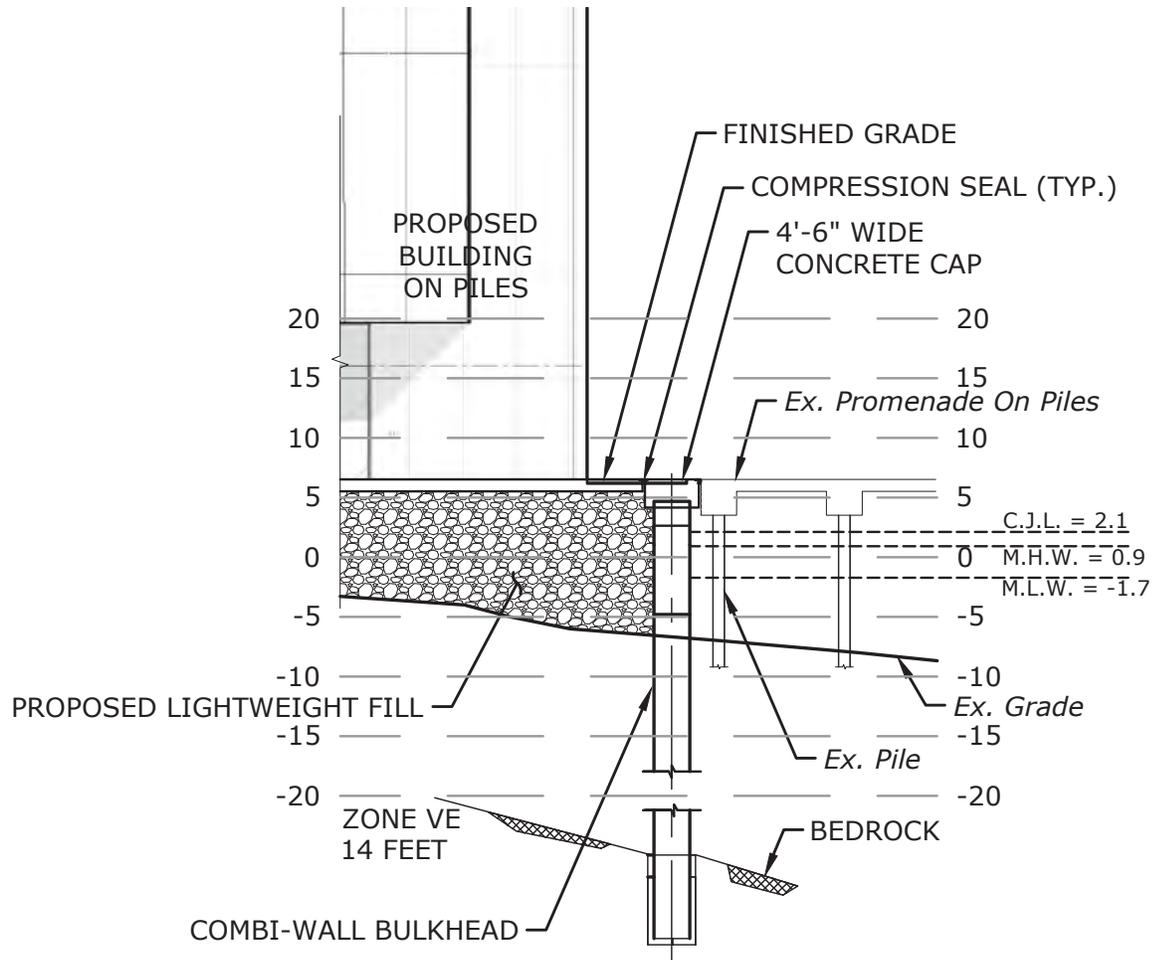
80 REALTY DRIVE
 CHEBBIHINE, CT 06410
 203.271.7779
 WWW.MMNC.COM

DATE JUNE 2020		
SCALE 1/16" = 1'-0"		
PROJ. NO. 5499-05		
DESIGNED KP	DRAWN NP	CHECKED KP

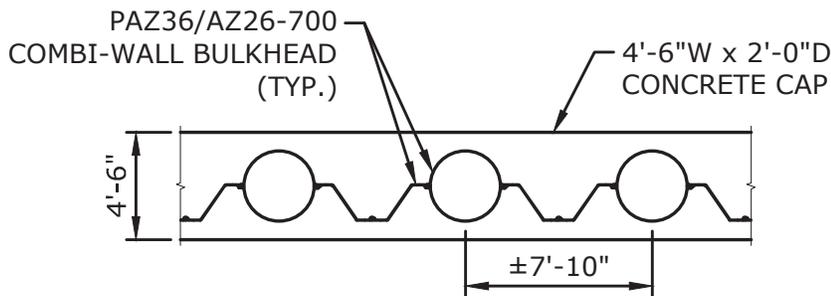
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07

Drawing: V:\DESIGN\5139-01-DE\CAD\DETAILS\PERMIT SET\DETAILS\SECTION B--B.DWG Layout Tab:8:5X11V



SECTION B-B



STEEL BULKHEAD - PLAN

SCALE: 1/8" = 1'-0"

Plotted by: SIKARAR On this date: Tue, 2020 June 2 - 10:40am



SECTION B-B

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE: JUNE 2020

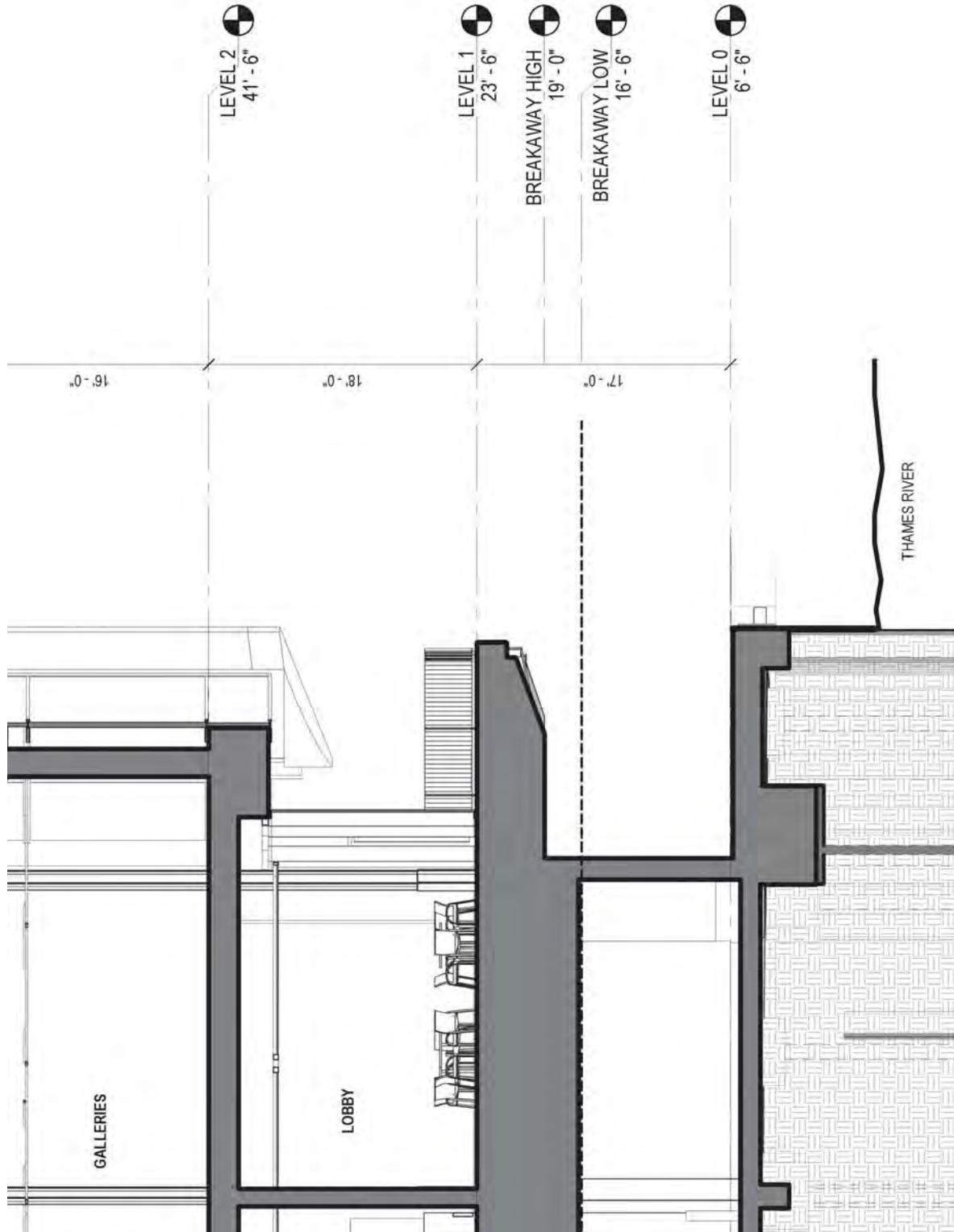
SCALE: 1" = 60'

PROJ. NO. 5499-05

DESIGNED KP	DRAWN NP	CHECKED KP
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DRAWING NAME:

08



MILONE &
MACBROOM
80 REALTY DRIVE
CHEBRIE, CT 06410
203.271.7779
WWW.MMBC.COM

MUSEUM SECTION VIEW
NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

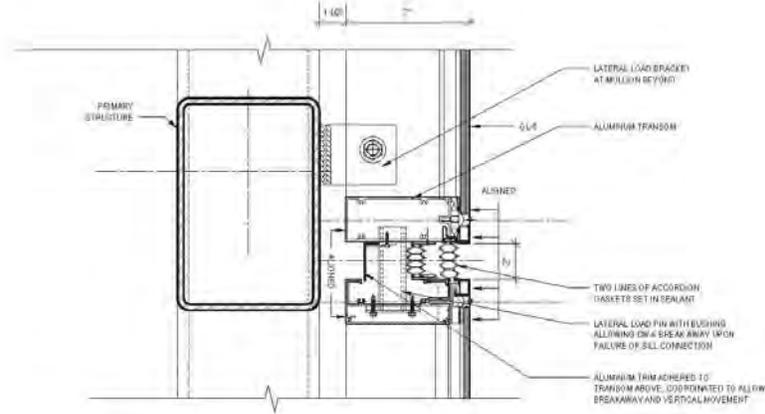
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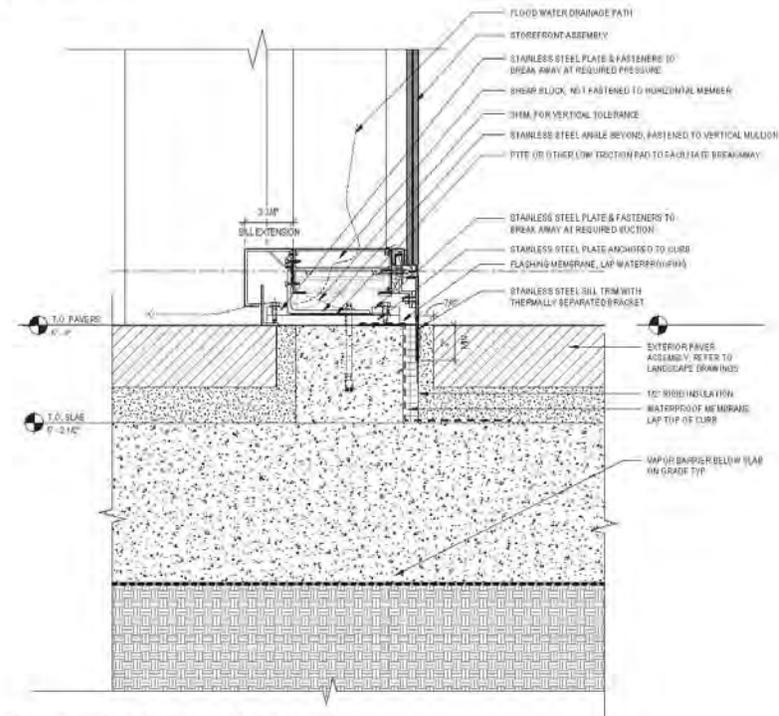
DATE JUNE 2020		
SCALE NOT TO SCALE		
PROJ. NO. 5499-05		
DESIGNED RE	DRAWN TT	CHECKED TD

DRAWING NAME:

09



2 HEAD DETAIL AT BREAK AWAY GLASS ENCLOSURE
SCALE: 1/2" = 1'-0"



1 SILL DETAIL AT BREAK AWAY GLASS ENCLOSURE
SCALE: 1/2" = 1'-0"



BREAKAWAY CURTAIN WALL
NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

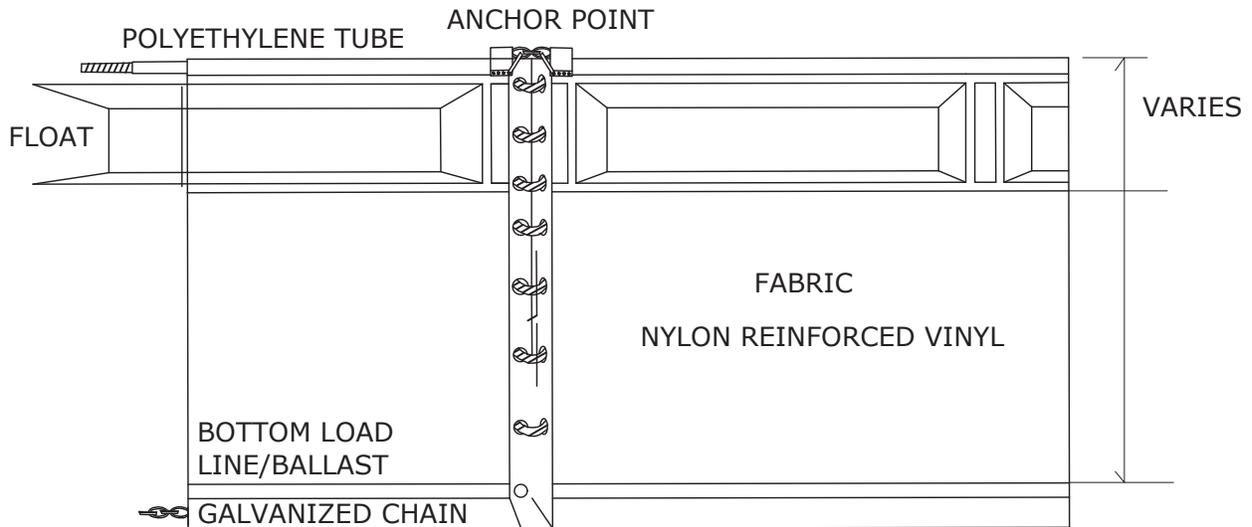
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REV: ---

DATE JUNE 2020		
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DESIGNED RE	DRAWN TT	CHECKED TD

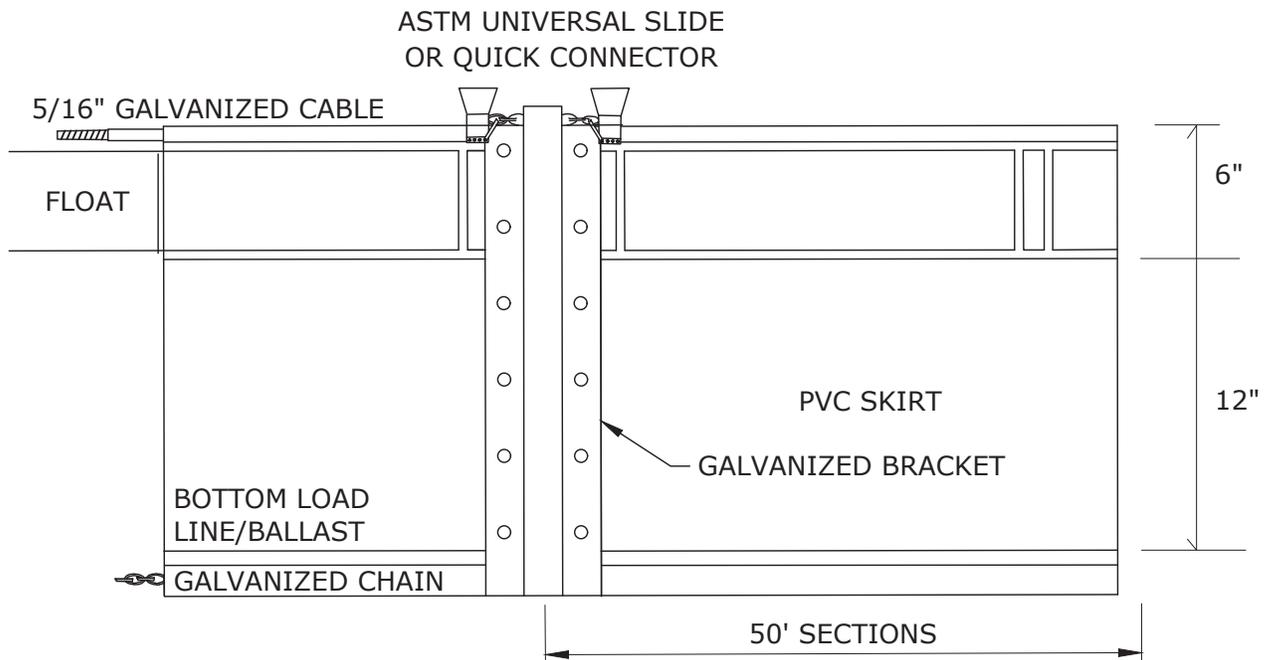
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10



TURBIDITY CURTAIN

NOT TO SCALE



OIL BOOM

NOT TO SCALE



**MILONE &
MACBROOM**
80 REALTY DRIVE
CHEBINE, CT 06410
203.271.7779
WWW.MMNC.COM

TURBIDITY CURTAIN/OIL BOOM

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **JUNE 2020**

SCALE **NOT TO SCALE**

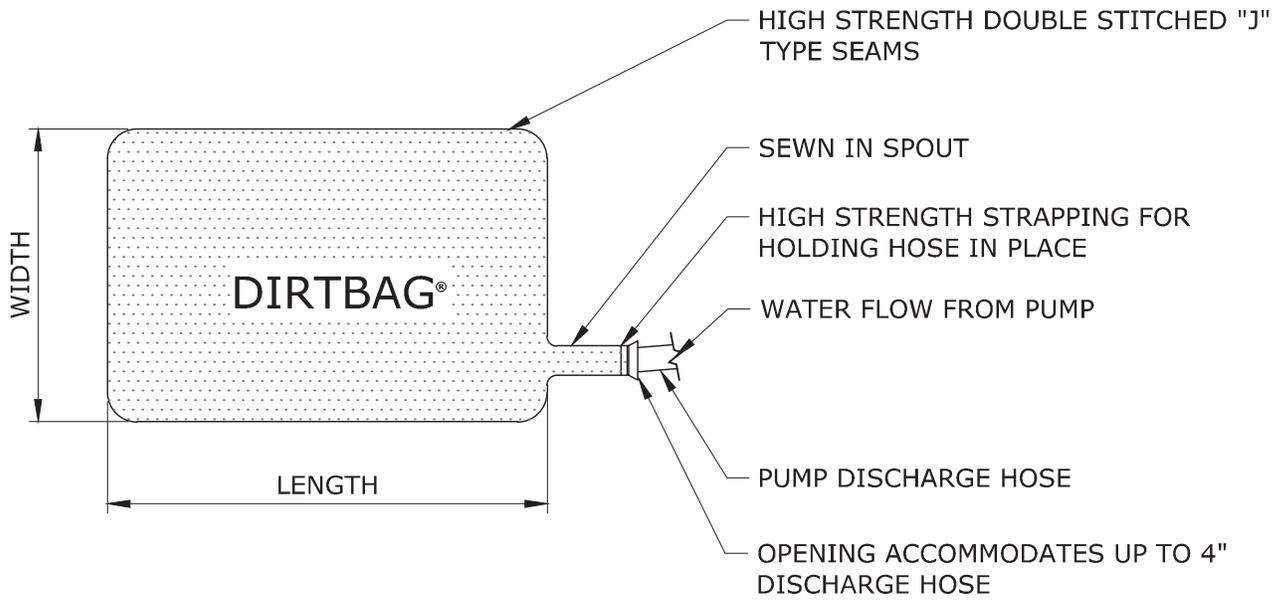
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DESIGNED RE	DRAWN TT	CHECKED TD
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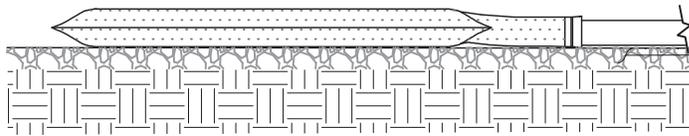
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11

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TOP VIEW



SIDE VIEW

DIRTBAG PUMPED SILT CONTROL SYSTEM

NOT TO SCALE

Plotted by: SKARAR On this date: Tue, 2020 June 2 - 10:41am



DIRTBAG PUMPED SILT CONTROL SYSTEM

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

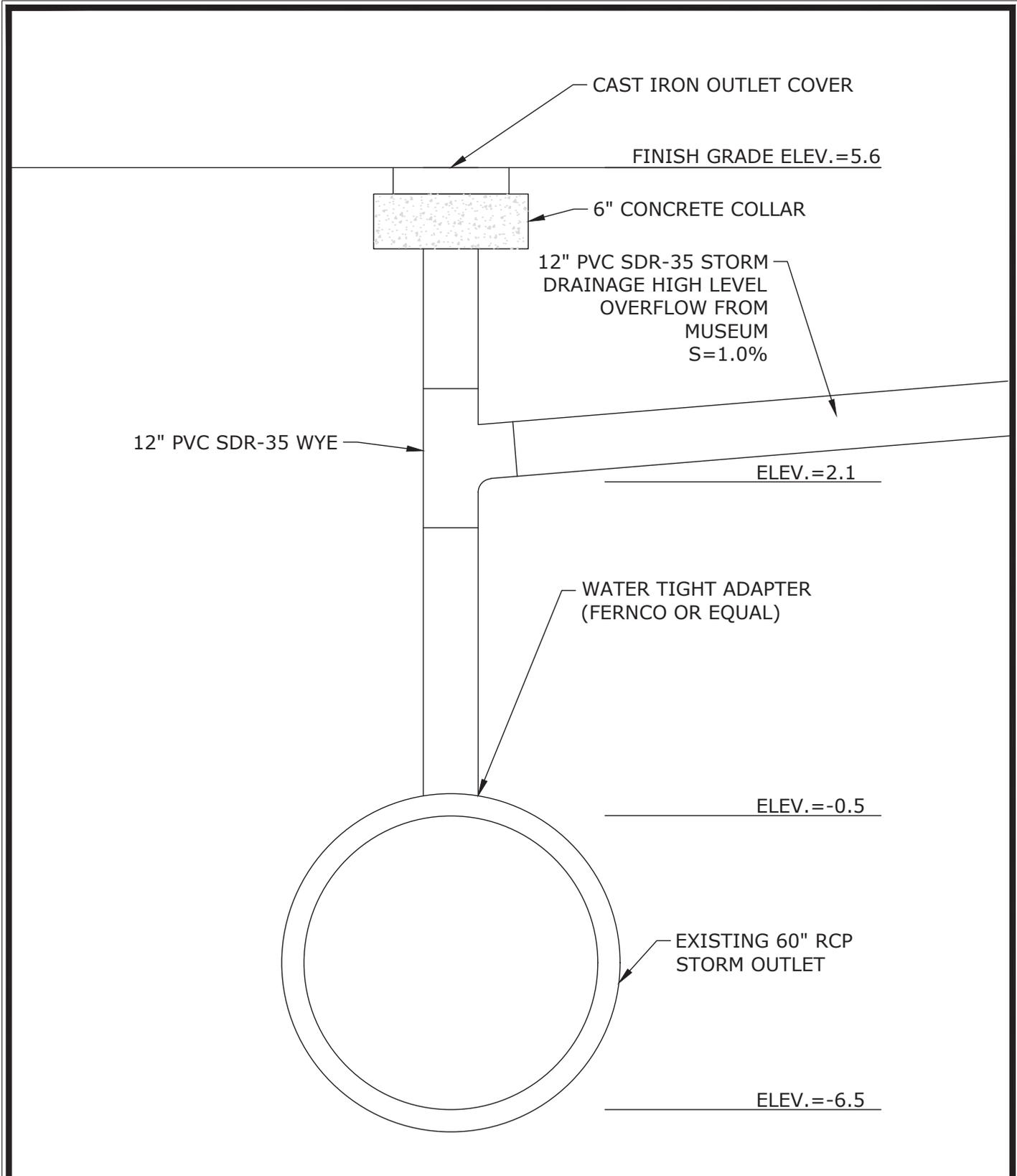
PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE JUNE 2020		
SCALE NOT TO SCALE		
PROJ. NO. 5499-05		
DESIGNED RE	DRAWN TT	CHECKED TD
DRAWING NAME: 12		

Drawing: V:\DESIGN\5139-01-DE\CAD\CAD-COM-ENVIRONMENTAL PERMIT SHEETS\DWG Layout Tab\CONNECTION

Plotted by: SKARAR On this date: Tue, 2020 June 2 - 10:41 am



PIPE CONNECTION TO EXISTING 60" RCP

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE JUNE 2020		
SCALE NOT TO SCALE		
PROJ. NO. 5499-05		
DESIGNED RE	DRAWN TT	CHECKED TD

DRAWING NAME:

13

APPENDIX C

Biological Resources

Appendix C3 – 2017 Natural Diversity Data Base Request

Appendix C4 – 2017 Natural Diversity Data Base Response

Appendix C5 – EFH Correspondence

Appendix C6 – 2020 Natural Diversity Data Base Response

Appendix C7 – CT DEEP Fisheries Consultation

Appendix C8 - 2019 NOAA Letter of Concurrence

**APPENDIX C3
2017 NATURAL DIVERSITY DATABASE
REQUEST"**



Connecticut Department of
 Energy & Environmental Protection
 Bureau of Natural Resources
 Wildlife Division

CPPU USE ONLY	
App #:	_____
Doc #:	_____
Check #:	No fee required
Program:	Natural Diversity Database Endangered Species
Hardcopy	_____ Electronic _____

Request for Natural Diversity Data Base (NDDB) State Listed Species Review

Please complete this form in accordance with the [instructions](#) (DEEP-INST-007) to ensure proper handling of your request.

There are no fees associated with NDDB Reviews.

Part I: Preliminary Screening & Request Type

<p>Before submitting this request, you must review the most current Natural Diversity Data Base "State and Federal Listed Species and Significant Natural Communities Maps" found on the DEEP website. These maps are updated twice a year, usually in June and December.</p> <p>Does your site, including all affected areas, fall in an NDDB Area according to the map instructions: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Enter the date of the map reviewed for pre-screening: <u>08/01/2017</u></p>	
This form is being submitted for a :	
<input checked="" type="checkbox"/> <i>New NDDB request</i> <input type="checkbox"/> <i>Renewal/Extension of a NDDB Request, without modifications and within two years of issued NDDB determination (no attachments required)</i>	<input type="checkbox"/> <i>New Safe Harbor Determination (optional) must be associated with an application for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities</i> <input type="checkbox"/> <i>Renewal/Extension of an existing Safe Harbor Determination</i> <input type="checkbox"/> <i>With modifications</i> <input type="checkbox"/> <i>Without modifications (no attachments required)</i>
<small>[CPPU Use Only - NDDB-Listed Species Determination # 1736]</small>	<small>[CPPU Use Only - NDDB-Safe Harbor Determination # 1736]</small>
Enter NDDB Determination Number for Renewal/Extension:	Enter Safe Harbor Determination Number for Renewal/Extension:

Part II: Requester Information

If the requester is a corporation, limited liability company, limited partnership, limited liability partnership, or a statutory trust, it must be registered with the Secretary of State. If applicable, the name shall be stated **exactly as it is registered with the Secretary of State. Please note, for those entities registered with the Secretary of State, the registered name will be the name used by DEEP. This information can be accessed at the Secretary of the State's database CONCORD. (www.concord-sots.ct.gov/CONCORD/index.jsp)*

If the requester is an individual, provide the legal name (include suffix) in the following format: First Name; Middle Initial; Last Name; Suffix (Jr, Sr., II, III, etc.).

If there are any changes or corrections to your company/facility or individual mailing or billing address or contact information, please complete and submit the [Request to Change company/Individual Information](#) to the address indicated on the form.

1. Requester*

Company Name: **Milone & MacBroom, Inc.**

Contact Name: **Ellen Hart**

Address: **213 Main Street, Suite 102**

City/Town: **New Paltz**

State: **NY** Zip Code: **12561**

Business Phone: **845-633-8153**

ext.

E-mail: **ehart@mminc.com

****By providing this email address you are agreeing to receive official correspondence from the department, at this electronic address, concerning this request. Please remember to check your security settings to be sure you can receive emails from "ct.gov" addresses. Also, please notify the department if your e-mail address changes**

a) Requester can best be described as:

Individual Federal Agency State agency Municipality Tribal

business entity (if a business entity complete i through iii):

i) Check type corporation limited liability company limited partnership

limited liability partnership statutory trust Other:

ii) Provide Secretary of the State Business ID #: 0160851 This information can be accessed at the Secretary of the State's database (CONCORD). (www.concord-sots.ct.gov/CONCORD/index.jsp)

iii) Check here if your business is **NOT** registered with the Secretary of State's office.

b) Acting as (Affiliation), pick one:

Property owner Consultant Engineer Facility owner Applicant

Biologist Pesticide Applicator Other representative:

2. List Primary Contact to receive Natural Diversity Data Base correspondence and inquiries, if different from requester.

Company Name:

Contact Person:

Title:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

**E-mail:

Part III: Site Information

This request can only be completed for one site. A separate request must be filed for each additional site.

<p>1. SITE NAME AND LOCATION</p> <p>Site Name or Project Name: National Coast Guard Museum</p> <p>Town(s): New London</p> <p>Street Address or Location Description: 181 State Street</p> <p>Size in acres, or site dimensions: 0.34 acres</p> <p>Latitude and longitude of the center of the site in decimal degrees (e.g., 41.23456 -71.68574):</p> <p>Latitude: 41.353968 Longitude: 72.092552</p> <p>Method of coordinate determination (check one):</p> <p><input type="checkbox"/> GPS <input checked="" type="checkbox"/> Photo interpolation using CTECO map viewer <input type="checkbox"/> Other (specify):</p> <p>2a. Describe the current land use and land cover of the site.</p> <p>Gravel parking area bordered by a waterfront public plaza lined with pavers to the south, railroad tracks to the west, additional gravel parking area to the north and the Thames River to the east.</p> <p>b. Check all that apply and enter the size in acres or % of area in the space after each checked category.</p> <table><tr><td><input type="checkbox"/> Industrial/Commercial _____</td><td><input type="checkbox"/> Residential _____</td><td><input type="checkbox"/> Forest _____</td></tr><tr><td><input type="checkbox"/> Wetland _____</td><td><input type="checkbox"/> Field/grassland _____</td><td><input type="checkbox"/> Agricultural _____</td></tr><tr><td><input checked="" type="checkbox"/> Water <u>20%</u></td><td><input type="checkbox"/> Utility Right-of-way _____</td><td></td></tr><tr><td><input type="checkbox"/> Transportation Right-of-way _____</td><td><input checked="" type="checkbox"/> Other (specify): 80% gravel parking lot</td><td></td></tr></table>	<input type="checkbox"/> Industrial/Commercial _____	<input type="checkbox"/> Residential _____	<input type="checkbox"/> Forest _____	<input type="checkbox"/> Wetland _____	<input type="checkbox"/> Field/grassland _____	<input type="checkbox"/> Agricultural _____	<input checked="" type="checkbox"/> Water <u>20%</u>	<input type="checkbox"/> Utility Right-of-way _____		<input type="checkbox"/> Transportation Right-of-way _____	<input checked="" type="checkbox"/> Other (specify): 80% gravel parking lot	
<input type="checkbox"/> Industrial/Commercial _____	<input type="checkbox"/> Residential _____	<input type="checkbox"/> Forest _____										
<input type="checkbox"/> Wetland _____	<input type="checkbox"/> Field/grassland _____	<input type="checkbox"/> Agricultural _____										
<input checked="" type="checkbox"/> Water <u>20%</u>	<input type="checkbox"/> Utility Right-of-way _____											
<input type="checkbox"/> Transportation Right-of-way _____	<input checked="" type="checkbox"/> Other (specify): 80% gravel parking lot											

Part IV: Project Information

<p>1. PROJECT TYPE:</p> <p>Choose Project Type: Other , If other describe: Museum for the US Coast Guard _____</p>
<p>2. Is the subject activity limited to the maintenance, repair, or improvement of an existing structure within the existing footprint? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, explain.</p>

Part IV: Project Information (continued)

3. Give a detailed description of the activity which is the subject of this request and describe the methods and equipment that will be used. Include a description of steps that will be taken to minimize impacts to any known listed species.

The Coast Guard proposes to allow the NCGMA to construct an approximately 70,000 to 80,000 square-foot museum with an at-grade entry level plus five to six stories to be located in downtown New London, Connecticut on land that is now or will be in the future owned by the U.S. Coast Guard. On completion of the museum, the Coast Guard intends to accept the donation of the museum and operate it in perpetuity. The proposed action includes the following action elements: (1) acquisition of approximately 2,000 square feet of land area to the south that is currently owned by the City of New London; (2) acquisition of approximately 12,200 square feet of land area that is currently owned by the State of Connecticut (8,900 square feet of which is currently covered by the City Pier platform); (3) minor property boundary adjustments; (4) construction of approximately 225 linear feet of bulkhead and fill along the shoreline of the Thames River; (5) demolition of approximately 3,300 square feet of the City Pier Plaza to provide compensatory open water; (6) completion of site and utility improvements on land and in the water to accommodate the Museum and water exhibits; and (7) construction and operation of the Museum.

4. If this is a renewal or extension of an existing Safe Harbor request *with* modifications, explain what about the project has changed.

5. Provide a contact for questions about the project details if different from Part II primary contact.

Name:

Phone:

E-mail:

Part V: Request Requirements and Associated Application Types

Check *one* box from either Group 1, Group 2 *or* Group 3, indicating the appropriate category for this request.

Group 1. If you check one of these boxes, complete Parts I – VII of this form and submit the required attachments A and B.

- Preliminary screening was negative but an NDDB review is still requested
- Request regards a municipally regulated or unregulated activity (no state permit/certificate needed)
- Request regards a preliminary site assessment or project feasibility study
- Request relates to land acquisition or protection
- Request is associated with a *renewal* of an existing permit, with no modifications

Group 2. If you check one of these boxes, complete Parts I – VII of this form and submit required attachments A, B, *and* C.

- Request is associated with a *new* state or federal permit application
- Request is associated with modification of an existing permit
- Request is associated with a permit enforcement action
- Request regards site management or planning, requiring detailed species recommendations
- Request regards a state funded project, state agency activity, or CEPA request

Group 3. If you are requesting a **Safe Harbor Determination**, complete Parts I-VII and submit required attachments A, B, and D. Safe Harbor determinations can only be requested if you are applying for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities

If you are filing this request as part of a state or federal permit application(s) enter the application information below.

Permitting Agency and Application Name(s):

USCG, NEPA review

State DEEP Application Number(s), if known: _____

State DEEP Enforcement Action Number, if known: _____

State DEEP Permit Analyst(s)/Engineer(s), if known: _____

Is this request related to a previously submitted NDDB request? Yes No

If yes, provide the previous NDDB Determination Number(s), if known: **unknown** _____

Part VI: Supporting Documents

Check each attachment submitted as verification that *all* applicable attachments have been supplied with this request form. Label each attachment as indicated in this part (e.g., Attachment A, etc.) and be sure to include the requester's name, site name and the date. **Please note that Attachments A and B are required for all new requests and Safe Harbor renewals/extensions with modifications.** Renewals/Extensions with no modifications do not need to submit any attachments. Attachments C and D are supplied at the end of this form.

<input checked="" type="checkbox"/> Attachment A:	Overview Map: an 8 1/2" X 11" print/copy of the relevant portion of a USGS Topographic Quadrangle Map clearly indicating the exact location of the site.
<input checked="" type="checkbox"/> Attachment B:	Detailed Site Map: fine scaled map showing site boundary and area of work details on aerial imagery with relevant landmarks labeled. (Site and work boundaries in GIS [ESRI ArcView shapefile, in NAD83, State Plane, feet] format can be substituted for detailed maps, see instruction document)
<input checked="" type="checkbox"/> Attachment C:	Supplemental Information, Group 2 requirement (attached, DEEP-APP-007C) <input checked="" type="checkbox"/> Section i: Supplemental Site Information and supporting documents <input checked="" type="checkbox"/> Section ii: Supplemental Project Information and supporting documents
<input type="checkbox"/> Attachment D:	Safe Harbor Report Requirements, Group 3 (attached, DEEP-APP-007D)

Part VII: Requester Certification

The requester *and* the individual(s) responsible for actually preparing the request must sign this part. A request will be considered incomplete unless all required signatures are provided.

<p>"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief."</p>	
Signature of Requester (a typed name will substitute for a handwritten signature)	Date
Name of Requester (print or type)	Title (if applicable)
<i>Ellen M Hart</i>	8/8/2017
Signature of Preparer (if different than above)	Date
Milone & MacBroon, Inc. (Ellen Hart)	Environmental Scientist
Name of Preparer (print or type)	Title (if applicable)

Note: Please submit the completed Request Form and all Supporting Documents to:

CENTRAL PERMIT PROCESSING UNIT
 DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
 79 ELM STREET
 HARTFORD, CT 06106-5127

Or email request to: deep.nddbrequest@ct.gov

Attachment C: Supplemental Information, Group 2 requirement

Section i: Supplemental Site Information

1. Existing Conditions

Describe all natural and man-made features including wetlands, watercourses, fish and wildlife habitat, floodplains and any existing structures potentially affected by the subject activity. Such features should be depicted and labeled on the site plan that must be submitted. Photographs of current site conditions may be helpful to reviewers.

The project site consists of a gravel parking area. It is devoid of any plant life, but is bordered to the east by the Thames River. The proposed action includes the construction of approximately 225 linear feet of bulkhead and fill along the shoreline of the Thames River. Demolition of approximately 3,300 square feet of the City Pier Plaza, which was constructed above water within the Thames River, is proposed to provide compensatory open water and benefit river habitat. See attached photos.

- Site Photographs (optional) attached
- Site Plan/sketch of existing conditions attached

2. Biological Surveys

Has a biologist visited the site and conducted a biological survey to determine the presence of any endangered, threatened or special concern species Yes No

If yes, complete the following questions and submit any reports of biological surveys, documentation of the biologist's qualifications, and any NDDB survey forms.

Biologist(s) name: _____

Habitat and/or species targeted by survey: _____

Dates when surveys were conducted: _____

- Reports of biological surveys attached
- Documentation of biologist's qualifications attached
- [NDDB Survey forms](#) for any listed species observations attached

Section ii: Supplemental Project Information

1. Provide a schedule for all phases of the project including the year, the month and/or season that the proposed activity will be initiated and the duration of the activity.

The proposed action involves the following actions: acquisition of land, including a portion of City Pier that was constructed above the Thames River; minor property boundary adjustments; construction of approximately 225 linear feet of bulkhead and fill along the shoreline of the Thames River; demolition of approximately 3,300 square feet of the City Pier Plaza to provide compensatory open water; completion of site and utility improvements on land and in the water to accommodate the Museum and water exhibits; and construction and operation of the Museum. All of these activities are anticipated to take 2 years or more to complete.

2. Describe and quantify the proposed changes to existing conditions and describe any on-site or off-site impacts. In addition, provide an annotated site plan detailing the areas of impact and proposed changes to existing conditions.

The site will be transformed from a gravel parking lot to a 70,000 to 80,000 square foot building with associated outdoor features and utility improvements. Please see attached photolog and site plan.

Annotated Site Plan attached

Attachment D: Safe Harbor Report Requirements

Submit a report, as Attachment D, that synthesizes and analyzes the information listed below. Those providing synthesis and analysis need appropriate qualifications and experience. A request for a safe harbor determination shall include:

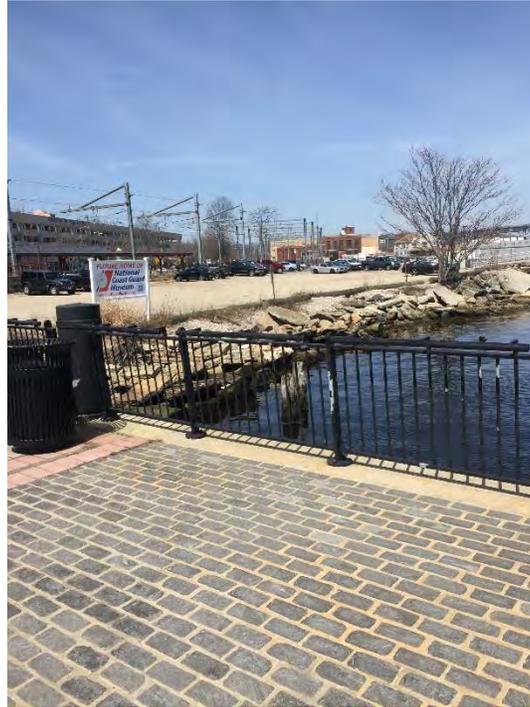
- 1. Habitat Description and Map(s), including GIS mapping overlays, of a scale appropriate for the site, identifying:**
 - wetlands, including wetland cover types;
 - plant community types;
 - topography;
 - soils;
 - bedrock geology;
 - floodplains, if any;
 - land use history; and
 - water quality classifications/criteria.
- 2. Photographs** - The report should include photographs of the site taken from the ground and also all reasonably available aerial or satellite photographs and an analysis of such photographs.
- 3. Inspection** - A visual inspection(s) of the site should be conducted, preferably when the ground is visible, and described in the report. This inspection can be helpful in confirming or further evaluating the items noted above.
- 4. Biological Surveys** - The report should include all biological surveys of the site where construction activity will take place that are reasonably available to a registrant. A registrant shall notify the Department's Wildlife Division of biological studies of the site where construction activity will take place that a registrant is aware of but are not reasonably available to the registrant.
- 5. Based on items #1 through 4 above, the report shall include a Natural Resources Inventory of the site of the construction activity.** This inventory should also include a review of reasonably available scientific literature and any recommendations for minimizing adverse impacts from the proposed construction activity on listed species or their associated habitat.
- 6. In addition, to the extent the following is available at the time a safe harbor determination is requested, a request for a safe harbor determination shall include and assess:**
 - Information on Site Disturbance Estimates/Site Alteration information
 - Vehicular Use
 - Construction Activity Phasing Schedules, if any; and
 - Alteration of Drainage Patterns



Existing Conditions: View of Site from South and West



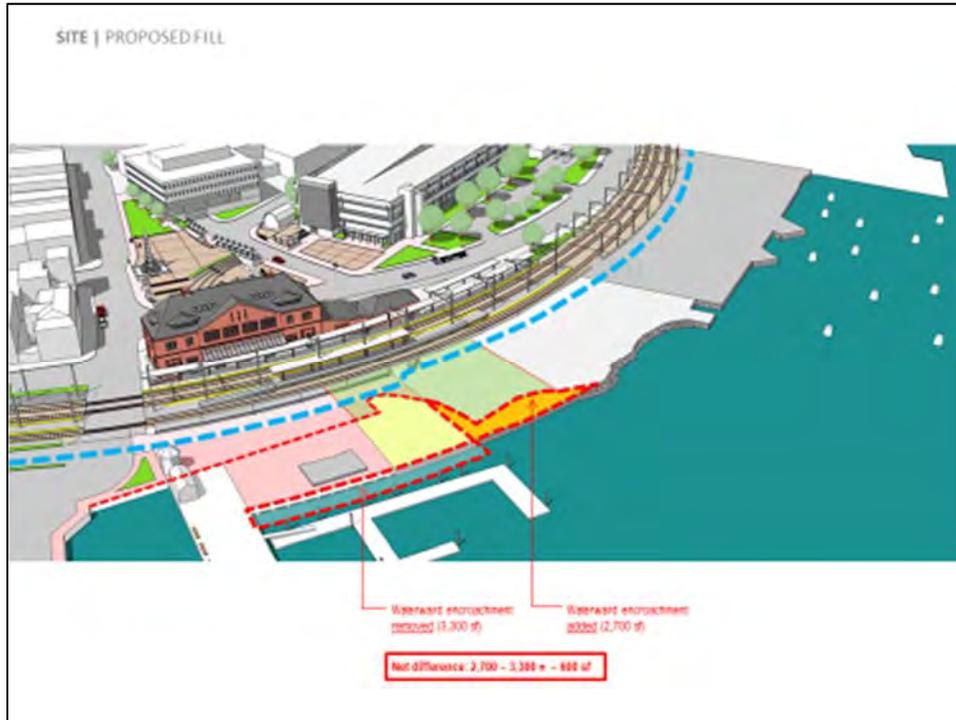
Existing Conditions: View of Site from South



Existing Conditions: View of Site from South and East



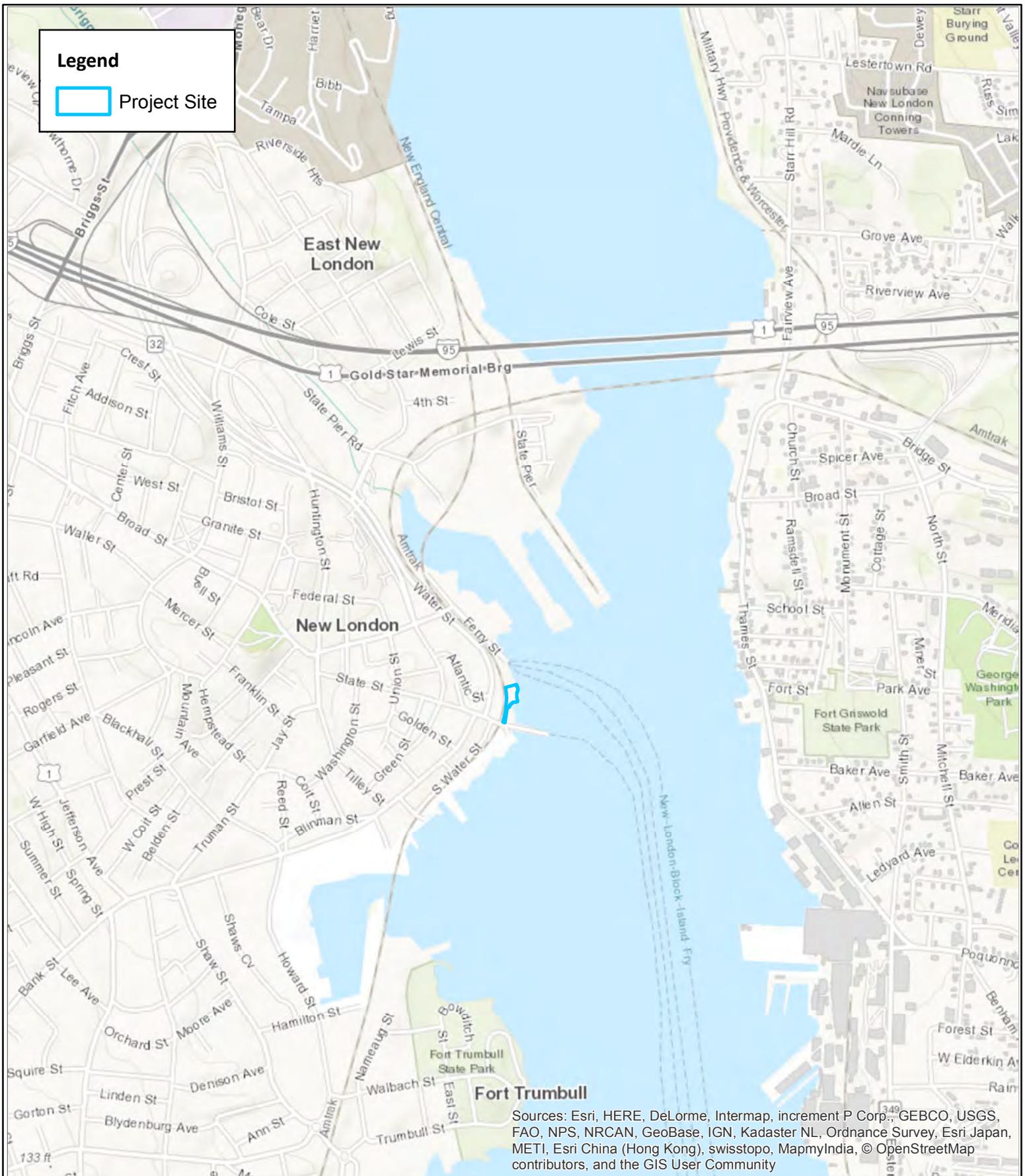
Existing Conditions: View of City Pier overhang from Site



Project Site with Proposed Lot Line Changes



Proposed Layout



SOURCE(S):
 CT Ortho, 2016

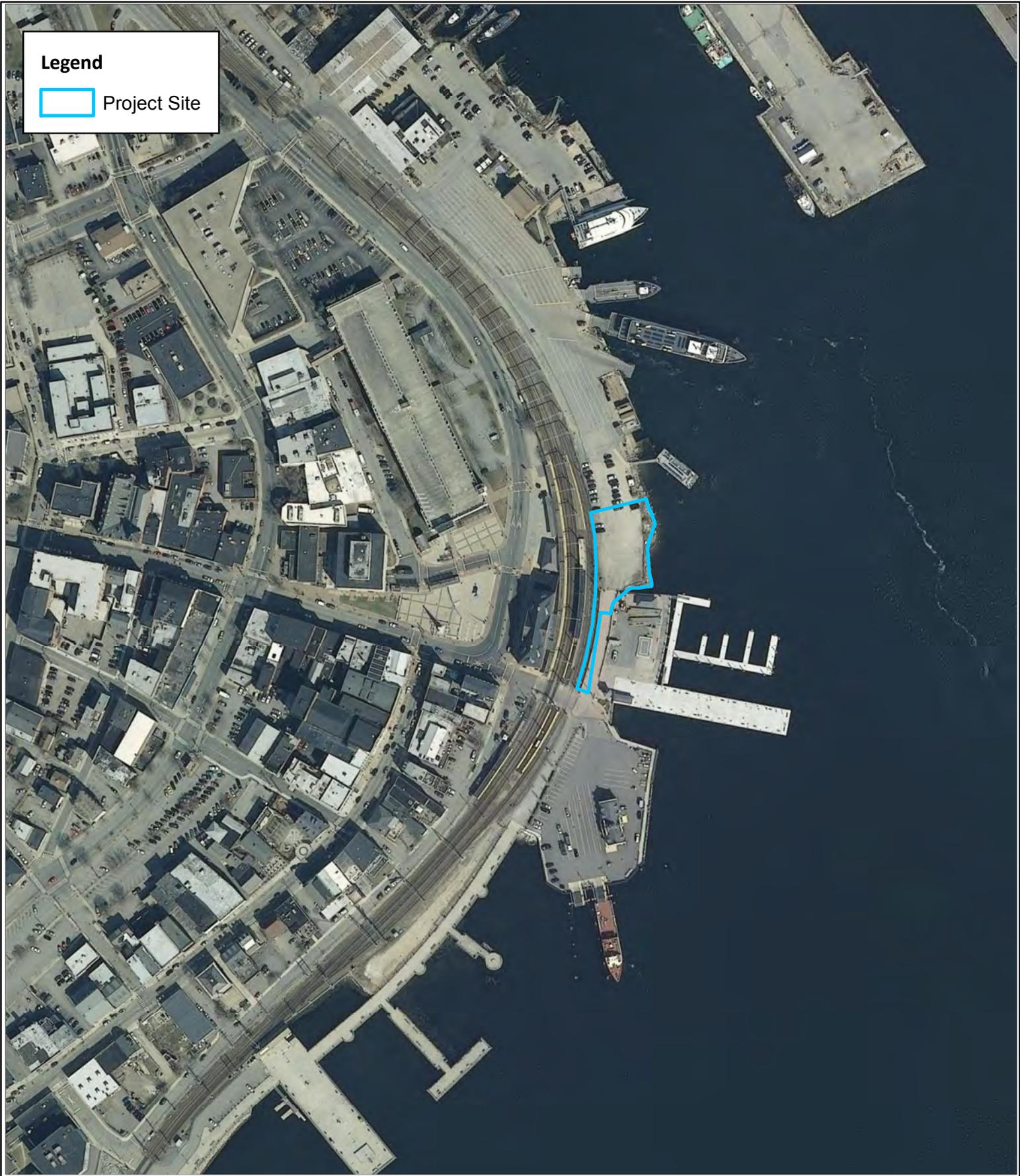
Figure 1: Project Location

LOCATION:
 New London, CT


Project Study Area
National Coast Guard Museum

Map By: EMH
MMI#: 5499-03
Original: 3/30/2017
Revision: 8/3/2017
Scale: 1 inch = 1,265.96 feet


MILONE & MACBROOM
 99 Realty Drive Cheshire, CT 06410
 (203) 271-1773 Fax: (203) 272-9733
www.miloneandmacbroom.com



Legend

Project Site

SOURCE(S):
CT Ortho, 2012

Figure 2: Aerial Map

LOCATION:
New London, CT



Project Study Area
National Coast Guard Museum

MXD: Q:\Projects\5499-03 USCG Museum\GIS\MAPS MDX\Project Location.mxd

Map By: EMH
MMI#: 5499-03
Original: 3/30/2017
Revision: 3/30/2017
Scale: 1 inch = 250 feet


MILONE & MACBROOM
 99 Realty Drive Cheshire, CT 06410
 (203) 271-1773 Fax: (203) 272-9733
www.miloneandmacbroom.com

**APPENDIX C4
2017 NATURAL DIVERSITY DATABASE
RESPONSE"**



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

August 22, 2017

Ellen Hart
Milone & Macbroom, Inc.
213 Main Street, Suite 102
New Paltz, NY 12561
ehart@mminc.com

Project: Construction of National Coast Guard Museum off Water Street at the south end of Ferry Street in New London
NDDDB Determination No.: 201706176

Dear Ellen Hart,

I have reviewed Natural Diversity Data Base (NDDDB) maps and files regarding the area delineated on the map provided for the proposed Construction of National Coast Guard Museum off Water Street at the south end of Ferry Street in New London, Connecticut. I do not anticipate negative impacts to State-listed species (RCSA Sec. 26-306) resulting from your proposed activity at the site based upon the information contained within the NDDDB. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits. This determination is good for two years. Please re-submit a new NDDDB Request for Review if the scope of work changes or if work has not begun on this project by August 22, 2019.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base.

Sincerely,

A handwritten signature in cursive script that reads "Dawn M. McKay".

Dawn M. McKay
Environmental Analyst 3

APPENDIX C5
EFH CORRESPONDENCE



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

June 12, 2020

Brendan Deyo
Chief Office of Environmental Management
United States Coast Guard Stop 7714
2703 Martin Luther King JR Ave SE
Washington, DC 20593-7714

RE: National Coast Guard Museum, New London, CT

Dear Chief Deyo:

We have reviewed the provided Essential Fish Habitat (EFH) assessment dated October 19, 2019, and supplemental information provided on April 7, 2020, for the National Coast Guard Museum project within the Thames River in New London, CT. The project involves the fill of approximately 9,300 square feet (SF) of tidal waters and habitats for the installation of a bulkhead to support upland development of the property. Specifically, the project proposes to fill 6,020 SF of shoreline within the existing dock configuration and 3,280 SF of existing open shoreline and shallow subtidal habitats. The removal of a 3,100 SF section of the existing pier is proposed as mitigation for the loss of tidal waters that would occur from the proposed fill.

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) and the Fish and Wildlife Coordination Act require Federal agencies to consult with one another on projects like this. Because the project involves Essential Fish Habitat (EFH), the consultation process is guided by the EFH regulatory requirements under 50 CFR 600.920, which mandates the preparation of EFH assessments and generally outlines your obligations. Based upon the provided information, we have determined that this project would result in adverse impacts to EFH. Therefore, pursuant to 50 CFR 600.920(i)(5), we are providing our EFH conservation recommendations based on the information we have received. We offer the following comments and recommendations on this project pursuant to the above referenced regulatory process.

Essential Fish Habitat Comments

The Thames River contains productive fishery habitats that support numerous important living marine resources including federally managed finfish and diadromous fish spawning migrations. In particular, the benthic communities around the project area support early life history stage winter flounder and summer flounder EFH, as well as summer flounder habitat of particular concern (HAPC). The proposed project would result in a direct, permanent loss of 9,300 SF of such habitats through the proposed placement of fill for the bulkhead installation.



This area of the Thames River is designated EFH for all life stages of winter flounder, including habitat for spawning adults and developing eggs and larvae, as well as juvenile life history stages. The presence and importance the Thames River for early life history stages of winter flounder early life history stages is well documented. Of particular concern for this project is that winter flounder spawn in shallow, tidal waters (Pereira *et al.* 1999). The designated winter flounder egg EFH for this project area includes subtidal waters from the shoreline to a maximum depth of 5 meters. Due to the importance of intertidal habitats for juvenile winter flounder, the New England Fishery Management Council has recently updated the juvenile winter flounder EFH designation to include intertidal habitats, in addition to subtidal habitats. The winter flounder larvae designation includes all reaches of the tide. Therefore, the proposed project would result in the permanent loss of 9,300 SF of designated sensitive life history stage winter flounder EFH.

The Mid-Atlantic Fishery Management Council designation for summer flounder habitat area of particular concern (HAPC) includes all areas where juvenile or adult summer flounder EFH is designated, and features SAV and/or macroalgae. Based on the provided information, the proposed bulkhead footprint would overlap with the designated summer flounder HAPC. In your supplemental information letter, dated November 25, 2019, you stated that due to impacts to primary production beneath the existing pier, the habitat is “largely absent macrophytic algae [but, rock] weed (*Fucus* spp.) exists in patches within the open portion of shoreline.” However, we maintain that that all areas within the proposed bulkhead footprint that currently support macroalgae are consistent with the summer flounder HAPC. In addition to the 9,300 sf of impacts to winter flounder EFH stated above, the filling of such habitats as a result of the bulkhead installation would result in a permanent loss of summer flounder HAPC.

Currently, you have proposed the removal of 3,100 SF of pier as mitigation for the permanent loss of 9,300 SF of intertidal and subtidal habitats. In your April 7, 2020 letter, you indicate that the Army Corps of Engineers has verbally concurred with the proposed mitigation. While we agree that some level of benefit may be realized by the removal of the 3,100 SF section of pier, we do not agree that it will serve as appropriate mitigation for the proposed loss of tidal resources. For large piers, where shading may result in adverse impacts to tidal resources (e.g. eelgrass or macroalgae), minimization and/or mitigation is necessary to reduce and/or offset losses, and the removal of a pier from such areas may be considered for mitigation purposes. For this project however, we disagree with the utilization of a pier removal as mitigation for the proposed permanent losses. There does not appear to be any potential secondary benefit (e.g. increased lighting) to the remaining area under the existing pier as it will be converted to fill as part of the bulkhead installation. Additionally, there is minimal potential habitat benefit to the area that will be “daylighted” in the proposed pier removal area as it is located within the footprint of the floating dock configuration where vessel traffic may occur and adjacent to a large floating dock, diminishing any potential for any accrual of benefits from its removal.

Further, winter flounder typically spawn in the winter and early spring although the exact timing is temperature dependent and thus varies with latitude (Able and Fahay 1998). Winter flounder have demersal eggs that sink and remain on the bottom until they hatch. Once deposited on the substrate, these eggs are vulnerable to sedimentation with decreased hatching success of eggs observed when covered in as little as 1 mm of sediment and burial in sediments greater than 2.5 mm have been shown to cause no hatch (Berry *et al.* 2011). Winter flounder larvae are negatively buoyant (Pereira *et al.*



1999), and are typically more abundant near the bottom (Able and Fahay 1998). These life stages are less mobile and thus more likely to be affected adversely by the placement of fill in tidal waters and the associated turbidity impacts. To protect winter flounder sensitive life history stages, we typically recommend fill and silt producing activities be conducted outside the time of year spawning, egg and larval development occur in a project area. In your supplemental information letter dated November 25, 2019, the proposed construction management strategies to minimize impacts to in-water resources includes the working during low tide conditions to the extent possible and the installation of a silt curtain. As depicted on the revised project plans, the proposed silt curtain will extend well into the shallow subtidal, to depths up to -14 or -15' NAVD88. Due to the potential for spawning winter flounder and hatched larvae to bypass sediment and turbidity controls, as well as the temporal loss of spawning habitat contained within such controls, we do not support using such controls to complete dredging activities throughout the spawning and early life history development stages.

Essential Fish Habitat Conservation Recommendations

Section 305(b)(2) of the MSA requires all federal agencies to consult with us on any action authorized, funded, or undertaken by that agency that may adversely affect EFH. The Thames River been identified as EFH under the MSA for multiple federally-managed species. We recommend, pursuant to Section 305(b)(a)(A) of the MSA, that you adopt the following EFH conservation recommendations:

1. To offset the permanent loss of 9,300 SF of summer flounder HAPC and winter flounder sensitive life history stage EFH a comprehensive compensatory mitigation plan should be developed and provided for our review and comment.
2. To minimize adverse effects to winter flounder sensitive life history stage habitat within and adjacent to the project area, no dredging or in-water work should occur from January 1 to May 31, of any calendar year.

Please note that Section 305(b)(4)(B) of the MSA requires you to provide us with a detailed written response to these EFH conservation recommendations, including a description of measures you adopt for avoiding, mitigating or offsetting the impact of the project on EFH. In the case of a response that is inconsistent with our recommendations, Section 305(b)(4)(B) of the MSA also indicates that you must explain your reasons for not following the recommendations. Included in such reasoning would be the scientific justification for any disagreements with us over the anticipated effects of the proposed action and the measures needed to avoid, minimize, mitigate or offset such effects pursuant to 50 CFR 600.920(k).

Please also note that a distinct and further EFH consultation must be reinitiated pursuant to 50 CFR 600.920(l) if new information becomes available or the project is revised in such a manner that affects the basis for the above EFH conservation recommendations.

Endangered Species Act

A consultation, pursuant to section 7 of the Endangered Species Act (ESA) of 1973, as amended, may be necessary. Under the ESA, if the proposed project has the potential to affect listed species or



designated critical habitat, and it is being approved, permitted or funded by a Federal agency, the lead Federal agency, or their designated non-Federal representative, is responsible for determining whether the proposed action may affect the listed species or designated critical habitat. In this situation, you are responsible for this determination. If you determine the proposed action may affect listed species under our authority, the determination along with justification for their determination should be sent to the attention of the ESA Section 7 Coordinator at nmfs.gar.esa.section7@noaa.gov (NMFS Greater Atlantic Regional Fisheries Office, Protected Resources Division (PRD), 55 Great Republic Drive, Gloucester, MA 01930). After reviewing this information, we would then be able to conduct a consultation under section 7 of the ESA. If you determine the proposed action will not affect listed species under our authority, no further consultation with us is necessary. Should you have any questions about these comments or about the section 7 consultation process in general, please contact Zach Jylkka at Zachary.Jylkka@noaa.gov or (978) 282-8467

Conclusion

In summary, we recommend a compensatory mitigation plan be developed for all permanent impacts and provided for our review and comment. Further, no fill or in-water silt producing activities should occur from January 1 to June 30, inclusive, of any calendar year. We look forward to your response to our EFH conservation recommendations on this project. Should you have any questions regarding our EFH recommendations or Fish and Wildlife Coordination Act comments, please contact

Alison Verkade at (978) 281-9266 or alison.verkade@noaa.gov.

Sincerely,

Louis A. Chiarella
Assistant Regional Administrator
for Habitat Conservation

cc: Zachary Jylkka, PRD
Diane Ray, USACOE
Steve Gephard, CT DEEP
Tom Nies, NEFMC
Chris Moore, MAFMC
Lisa Havel, ASMFC
Lieutenant Chris Mohnke, USCG
Megan Raymond, Milone and MacBroom
Captain Wes Pulver, National Coast Guard Museum



References

Able, K.W. and Fahay, M.P. 1998. First year in the life of estuarine fishes in the middle Atlantic Bight. Rutgers University Press, New Brunswick, NJ.

Berry, W.J., Hinchey, E.K., Rubinstein, N.I., Klein-MacPhee, G. 2004. Winter flounder, *Pseudopleuronectes americanus*, hatching success as a function of burial depth in the laboratory. Ninth flatfish biology conference- poster presentation; 2004 Dec 1-2; Westbrook, CT. Woods Hole (MA): Northeast Fisheries Science Center Reference Document 04-13.

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Pereira, J.J. R. Goldberg, J.J. Ziskowski, P.L. Berrien, W.W. Morse, and D.L. Johnson. 1999. Essential Fish Habitat Source Document: Winter Flounder, *Pseudopleuronectes americanus*, Life History and Habitat Characteristics. U.S. Dep. Commer., NOAA Technical Memorandum NMFS-NE-138.

Wilber D, Brostoff W, Clarke D, and Ray G. 2005. Sedimentation: potential biological effects of dredging operations in estuarine and marine environments. DOER Technical Notes Collection. Vicksburg (MS): US Army Engineer Research and Development Center. ERDC TN-DOER-E20.14 p.





5090
March 5, 2021

Ms. Alison T. Verkade
National Marine Fisheries Service
Greater Atlantic Regional Fisheries Office
Habitat Conservation Division
55 Great Republic Drive
Gloucester, MA 01930

Dear Ms. Verkade:

Thank you for your thorough review of the Coast Guard's Essential Fish Habitat assessment for the National Coast Guard Museum (NCGM) project. We appreciate the ongoing consultation and guidance that you've provided in conjunction with this project. After extensive internal review and discussion, we would like to offer the following, in response to your recommendations:

- 1) The National Coast Guard Museum Association (Association) has drafted a plan (Enc. A) to coordinate a volunteer shoreline clean-up on the Thames River in the vicinity of New London, CT in support of tidal resource loss mitigation due the NCGM project. Upon completion, the Association will provide a final report documenting the impacts of the clean-up. Additionally, the Museum will feature exhibits highlighting the Coast Guard's mission of protecting the environment which include living marine resources.
- 2) The Coast Guard and Association acknowledge the prohibition on dredging and in-water work between February 1st and May 31st and Association will adhere to the work window during project scheduling.

Please feel free to reach out to me or Senior Chief Joshua Folckemer at Joshua.D.Folckemer@uscg.mil. Thank you for your time and continued support!

Sincerely,

Mr. Andrew Haley
Chief
Office of Environmental Management (CG-47)



Situation:

The National Coast Guard Museum Association (NCGMA), a 501(c) 3, non-profit Charitable Organization that was formed in 2001 to raise funds and apply for and administer federal and state grants for the sole purpose of acquiring land, designing, constructing, collaborating with the U.S. Coast Guard on exhibits, and turning over to the U.S. Coast Guard a national museum in the City of New London, CT.

In preparation of the 2014 National Coast Guard Museum Environmental Assessment, the Coast Guard initiated coordination activities with NOAA Fisheries by letter in December 2013. In response NOAA Fisheries response indicated that the Thames River was designated an Essential Fish Habitat (EFH) for a number of federally managed species, including windowpane flounder, scup, and bluefish. The response also required the preparation of an EFH assessment.

The Coast Guard completed an EFH Assessment in October 2019 and provided supplemental information in April 2020. Per the June 12, 2020 NOAA Fisheries letter to the U.S. Coast Guard, it was noted that the proposed mitigation plan for the loss of tidal waters; the removal of 3,100 square feet of existing pier (daylighting), was not agreed upon as sufficient mitigation for the loss of tidal resources. Recommendations from the National Fisheries Service (NMFS) included no in-water and any dredging work from February 1 to May 31 of any calendar year and to provide a comprehensive compensatory mitigation plan for NMFS review and comment.

The NCGMA agrees to adhere to the recommended seasonal work window provided in the June 12, 2020 letter. Due to financial and legal constraints associated with the proposed project, the NCGMA is unable to provide additional direct mitigation or habitat compensation. After continued consultation with NMFS, the NCGMA will conduct a shoreline clean-up in the vicinity of the project area.

Mission:

In addition to the daylighting a portion of the City Pier plaza, sponsor a volunteer shoreline clean-up on the Thames River in the vicinity of New London, CT in support of tidal resource loss mitigation due to the National Coast Guard Museum project. It should be noted, that in addition to the mitigation plan below, additional benefit from the future National Coast Guard Museum will include an exhibit highlighting the Coast Guard's mission of protecting the environment which will include a Living Marine Resource gallery.



Execution:

The NCGMA will plan and coordinate a one-time volunteer shoreline clean-up to mitigate the tidal resource loss of 9,300 square feet. The clean-up will be held on a date prior to July 31, 2021, pending any unforeseen delays in regards to coordinating volunteers as a result of ongoing COVID-19 restrictions.

Action:

1. NCGMA will coordinate efforts of volunteers from local community organizations, Coast Guard units and affiliated associations to conduct shoreline clean-up.
2. The NCGMA will coordinate no less than 100 work hours collecting trash and debris. All collected items will be properly disposed of.
3. The proposed area for this shoreline clean-up is public accessible areas of the Thames River between the northern property line of the U.S. Coast Guard Academy and south to Ocean Beach Park, see Fig 1. The NCGMA will provide all required tools/items for the shoreline clean-up, (i.e., trash bags, etc.).

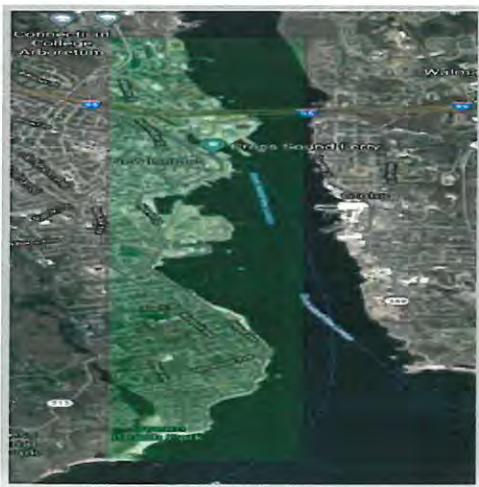


Fig 1.

4. Upon completion, the NCGMA will provide a written final report documenting the approximate total amount of trash collected, total number of volunteer hours, with before and after photographs of the areas impacted by the shoreline clean-up.
5. NCGMA POC: CAPT Mark Walsh, USCG (Ret.), mwalsh@coastguardmuseum.org, 860-443-4200.

A handwritten signature in blue ink, appearing to read "M Walsh", written over a horizontal line.

Mark B. Walsh
Chief Operating Officer
National Coast Guard Museum Association, Inc.



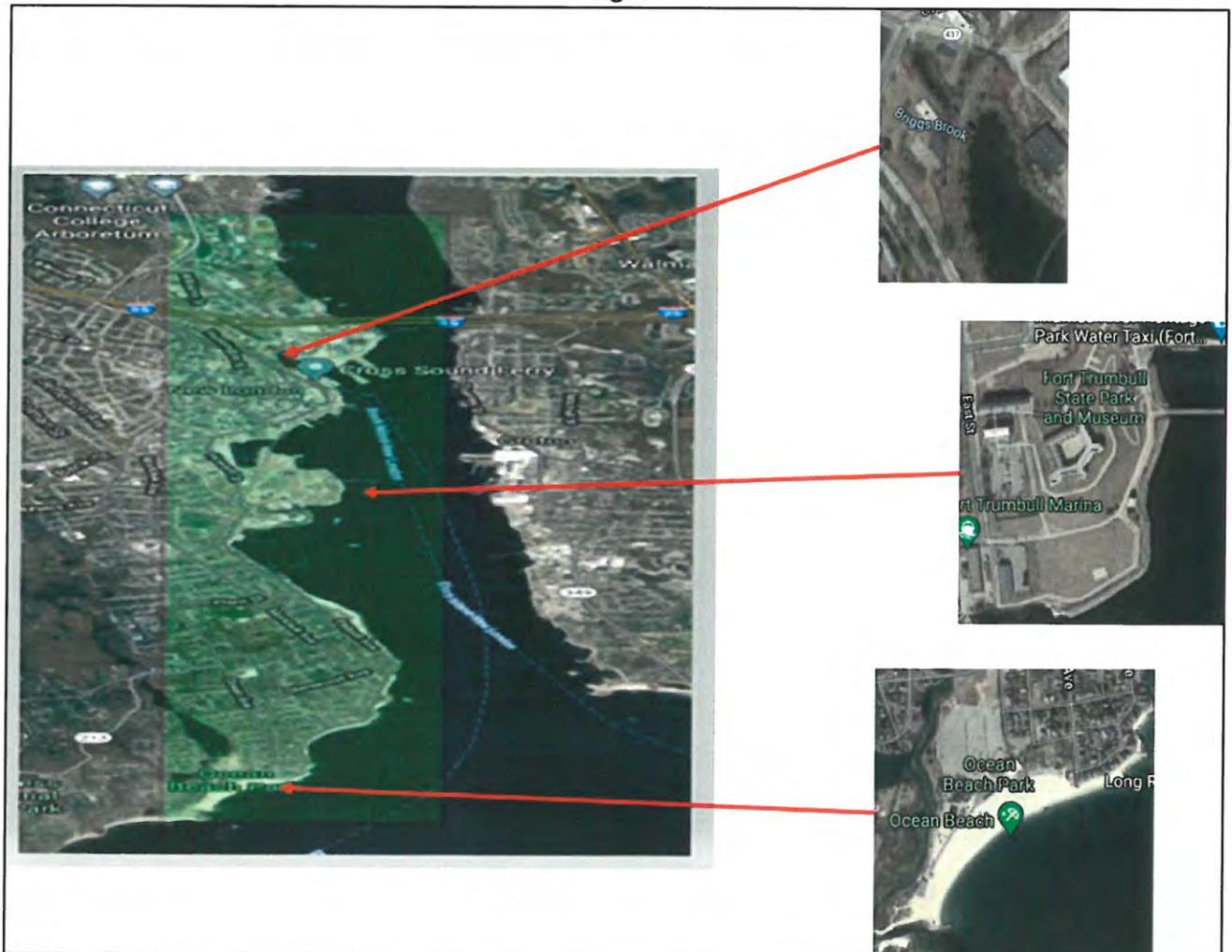
NATIONAL COAST GUARD MUSEUM ASSOCIATION

78 Howard Street, Suite A | New London, CT 06320 | 860-443-4200 | CoastGuardMuseum.org

SUBJECT: NATIONAL COAST GUARD MUSEUM ASSOCIATION EFH MITIGATION THAMES RIVER SHORELINE CLEAN UP AFTER ACTION REPORT

1. Per the National Coast Guard Museum Association (NCGMA) Thames River Shoreline Clean-up action plan, NCGMA collaborated with Fort Trumbull State Park, the City of New London, and with fellow non-profit, Save Ocean Beach to hold a shoreline clean up of the Thames River in New London, CT.
2. The clean up was held on Saturday April 24th, and held in conjunction with Earth Day (Apr 22nd). Sixty-Eight volunteers from the local community provided 2.5 hours of service each in support of the event, for a total of 170 work hours. Our goal was 100 hours.
3. See Fig 1 for areas targeted during the clean up:

Fig 1



4. About 30 bags of trash and debris were collected across all sites; and properly disposed of through the City of New London, Fort Trumbull State Park, and Ocean Beach. Other natural debris (brush, sticks, etc.) approximately four pick-up trucks worth; was collected and piled as requested by the City and Parks.

5. See Fig 2 for a few images from the event:

Fig 2



6. NCGMA POC: CAPT Mark Walsh, USCG (Ret), Chief Operating Officer, (860) 443-4200.

APPENDIX C6

2020 NATURAL DIVERSITY DATA BASE RESPONSE



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

April 30, 2020

Megan B. Raymond
Milone and MacBroom Inc
95 Church St, 7th fl
New Haven, CT 06510
mraymond@mminc.com

Project: Construction of National Coast Guard Museum, 181 State Street in New London, CT
NDDDB Determination No.: 202005519

Dear Ms. Raymond,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the construction of the National Coast Guard Museum, including installation of a ~282ft bulkhead along the Thames River and demolition of 3300 sqft of the City Pier Plaza in New London, Connecticut. According to our records, there are populations of State and Federally Endangered Atlantic and Shortnose Sturgeon as well as Special Concern Blueback herring (*Alosa aestivalis*) that occur in the Thames River.

Please be advised that a DEEP Fisheries Biologist will review the permit applications you may submit to DEEP regulatory programs to determine if your project could adversely affect state listed fish. DEEP Fisheries Biologists are routinely involved in pre-application consultations with regulatory staff and applicants in order to identify potential fisheries issues and work with applicants to mitigate negative effects, including to endangered species. If you have not already talked with a Fisheries Biologist about your project, you may contact the Permit Analyst assigned to process your application for further information, including the contact information for the Fisheries Biologist assigned to review your application. This determination is good for two years. Please re-submit an NDDDB Request for Review if the scope of work changes or if work has not begun on this project by April 30, 2022.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and such new information is incorporated into the database as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3378, or deep.nddbrequest@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Zyko".

Karen Zyko
Environmental Analyst

APPENDIX C7
CT DEEP FISHERIES CONSULTATION



**Connecticut Department of
Energy & Environmental Protection**
Bureau of Natural Resources
Fisheries Division

DEEP Fisheries Consultation Form

To the Applicant - Prior to the submission of your license application to the Connecticut Department of Energy & Environmental Protection (DEEP) Water Planning and Management Division (WPMD) or Land and Water Resources Division (LWRD), please complete Part I below and e-mail the following to deep.inland.fisheries@ct.gov:

1. this completed DEEP *Fisheries Consultation Form*;
2. a site location map,
3. a PDF version of the proposed project plans including a site survey of existing conditions (if available), and
4. photos of the site.

Fisheries Division staff will contact you if further details are needed. Once the Fisheries Division staff returns the completed form to you, please include the form, and any signed plans (if applicable) in your license application submittal to DEEP.

Part I: Applicant and Site Information *(to be completed by APPLICANT)*

1. Applicant/Registrant Information

Name: National Coast Guard Museum Association, Inc.

Mailing Address: 78 Howard Street

City/Town: New London

State: CT

Zip Code: 06320

Business Phone: 860.443.4200

Ext.: _____

Contact Person: Wes Pulver

Phone: 860.443.4200 Ext: 128

E-mail Address: rwpulver@coastguardmuseum.org

2. Engineer/Surveyor/Agent Information (list as applicable)

Name: Milone & MacBroom, Inc.

Mailing Address: 195 Church Street, 7th Floor

City/Town: New Haven

State: CT

Zip Code: 06320

Business Phone: 203.344.7887

Ext.: _____

Contact Person: Megan B. Raymond

Phone: 203.344.7889 Ext: _____

E-mail Address: mraymond@mminc.com

Service Provided: Ecological consulting and permitting

3. Site Location:

Name of Site: National Coast Guard Museum

Address of Site or Location Description: Water Street

City/Town: New London

State: CT

Zip Code: 06320

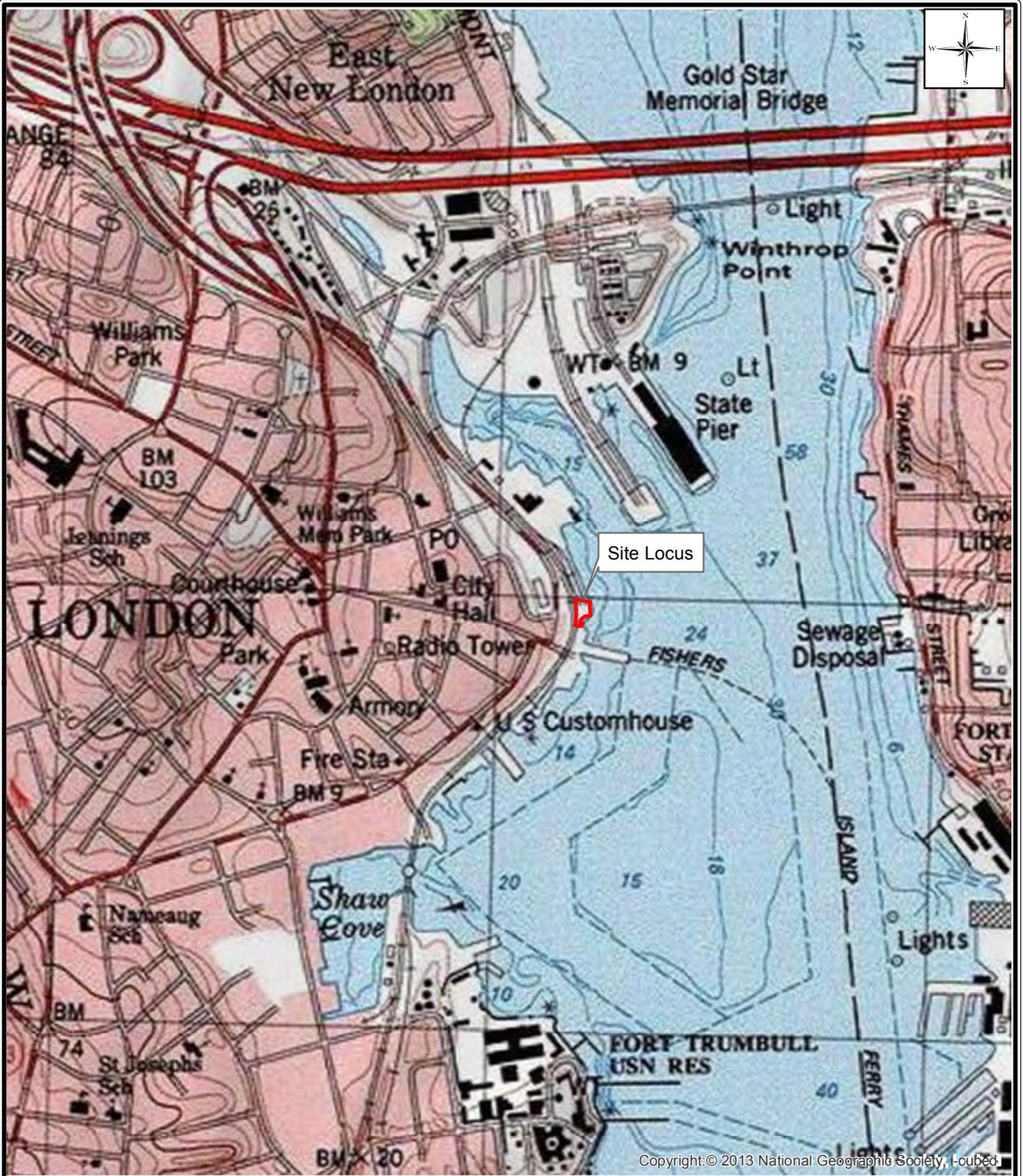
Parcel Location/Tax Assessor's Reference: Map G12 Block 108 Lot 1.0

Name of Stream or Waterbody: Thames River

4. Activity: Check the box best describing your activity: (check all that apply):

- new public/fishing access;
- new docks and marinas on the Connecticut River;
- coastal/tidal dredging projects;
- activities in inland/non-tidal waterbodies and watercourses;
- withdrawal of water from a non-tidal/inland river, stream, pond or lake;
- withdrawal of water from a wetland, marsh, swamp, or bog hydrologically connected to a non-tidal/inland river, stream, pond or lake;
- withdrawal of groundwater from stratified drift deposits hydrologically connected to a non-tidal/inland river, stream, pond or lake.

Note: Fisheries consultation is **not required** for docks and marinas on Long Island Sound.



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MILONE & MACBROOM
 99 Realty Drive
 Cheshire, Connecticut 06410
 (203) 271-1773
 www.mminc.com

USGS LOCUS MAP
 NATIONAL COAST GUARD MUSEUM
 WATER STREET
 NEW LONDON, CONNECTICUT
 SOURCE: USGS

DATE: OCTOBER 10, 2018
 SCALE: 1" = 1,000'
 PROJ. NO.: 5139-01
 DESIGNED: HLP DRAWN: HLP CHECKED: MBR

DRAWING NAME:
FIG. 1



Client Name:
National Coast Guard Museum Association

Site Location:
New London, CT

Project No.
5499-05

Photo No.
1

Date:
9/13/17

Direction Photo Taken:
North

Description:
Area of proposed bulkhead, looking toward Cross Sound Ferry dock.



Photo No.
2

Date:
6/19/18

Direction Photo Taken:
South

Description:
Area of proposed bulkhead, looking toward City Pier.



Client Name:
National Coast Guard Museum Association

Site Location:
New London, CT

Project No.:
5499-05

Photo No.: 3
Date: 8/24/18

Direction Photo Taken:
Northwest

Description:
View of NCGM site from City Pier, railroad right of way in background.



Photo No.: 4
Date: 8/9/18

Direction Photo Taken:
South

Description:
Riprap, cement piles and underside of promenade of City Pier. A remnant timber pile is visible on left.





Client Name:
National Coast Guard Museum Association

Site Location:
New London, CT

Project No.
5499-05

Photo No.
5

Date:
4/11/17

Direction Photo Taken:
Northeast

Description:
Existing condition of shoreline with rip-rap, construction slag, coarse sandy beach, and remnant timber piles.



Photo No.
6

Date:
4/11/17

Direction Photo Taken:
Northeast

Description:
Existing site condition.



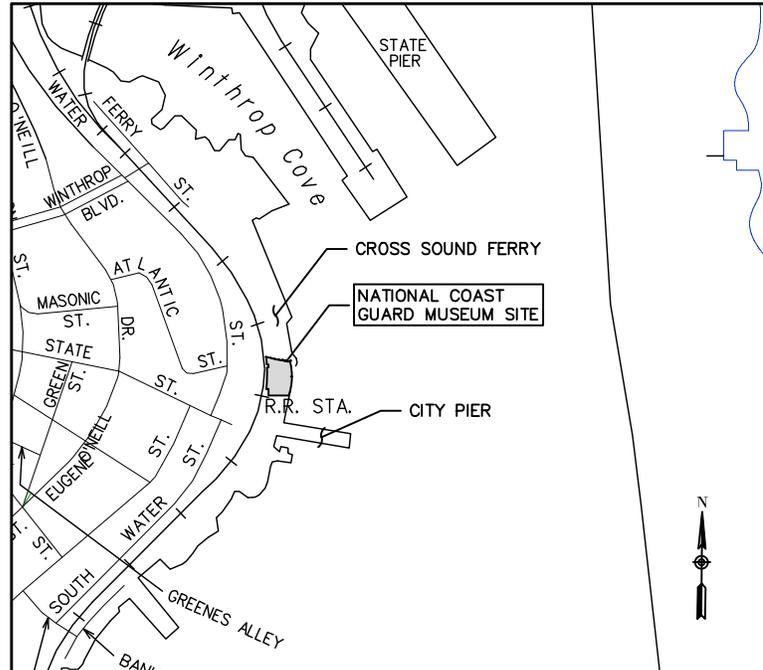
NATIONAL COAST GUARD MUSEUM

NEW LONDON, CONNECTICUT
COASTAL 401 WATER QUALITY CERTIFICATION

OCTOBER 2018
REVISED: DECEMBER 21, 2018

NOTES:

1. NAVD 88 DATUM
2. MHW = 1.8' (NGVD 29), 0.9' (NAVD 88)
MLW = -0.9' (NGVD 29), -1.7' (NAVD 88)
CJL = 3.10' (NGVD 29), 2.10' (NAVD 88)
3. TOPOGRAPHY AND PLANIMETRIC FEATURES ARE FROM FIELD SURVEY PREPARED BY MILONE AND MACBROOM, INC.



PROJECT VICINITY MAP
NOT TO SCALE

LIST OF DRAWINGS:

- 1 TITLE SHEET WITH LOCATION MAP
- 2 PARCEL MAP
- 3 SITE PLAN - EXISTING CONDITIONS
- 4 SITE PLAN - EXISTING CONDITIONS
- 5 SITE PLAN - PROPOSED CONDITIONS
- 6 SECTION A-A
- 7 SECTION B-B
- 8 BREAKAWAY CURTAIN WALL
- 9 TURBIDITY CURTAIN/OIL BOOM
- 10 DIRTBAG PUMPED SILT CONTROL SYSTEM
- 11 PIPE CONNECTION TO EXISTING 60" RCP

LEGEND

	EDGE OF WATER
	MAJOR CONTOUR
	MINOR CONTOUR
	TREE LINE
	UTILITY POLE
	PILING

PREPARED FOR:

NATIONAL COAST GUARD MUSEUM ASSOCIATION, INC.
321 ST. CHARLES AVENUE 10TH FLOOR
NEW ORLEANS, LOUISIANA 70130
BUSINESS PHONE: 860-443-4200



80 REALTY DRIVE
GREENWICH, CT 06860
203.571.7778
WWW.MMINC.COM

NATIONAL COAST GUARD MUSEUM

ON: THAMES RIVER
AT: NEW LONDON, CT

TITLE SHEET

LOCATION
MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

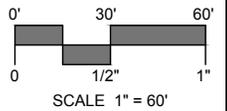
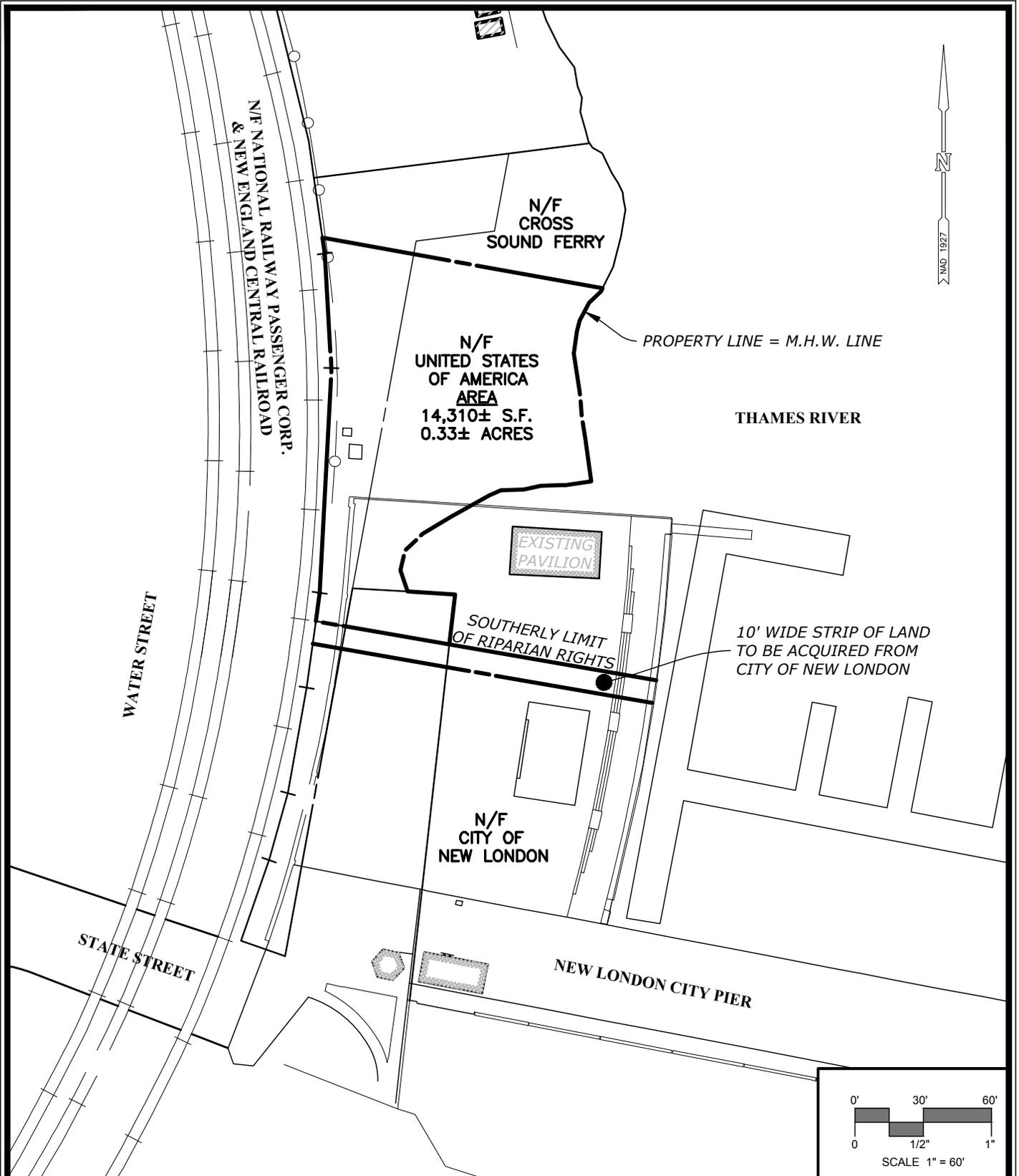
DATE **APRIL 1, 2020**
SCALE **NONE**
PROJ. NO. **5139-01**

SHEET

01

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Plotted by: ROCKE On this date: Wed, 2020 April 1 - 3:59pm



PARCEL MAP
NATIONAL COAST GUARD MUSEUM
 MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

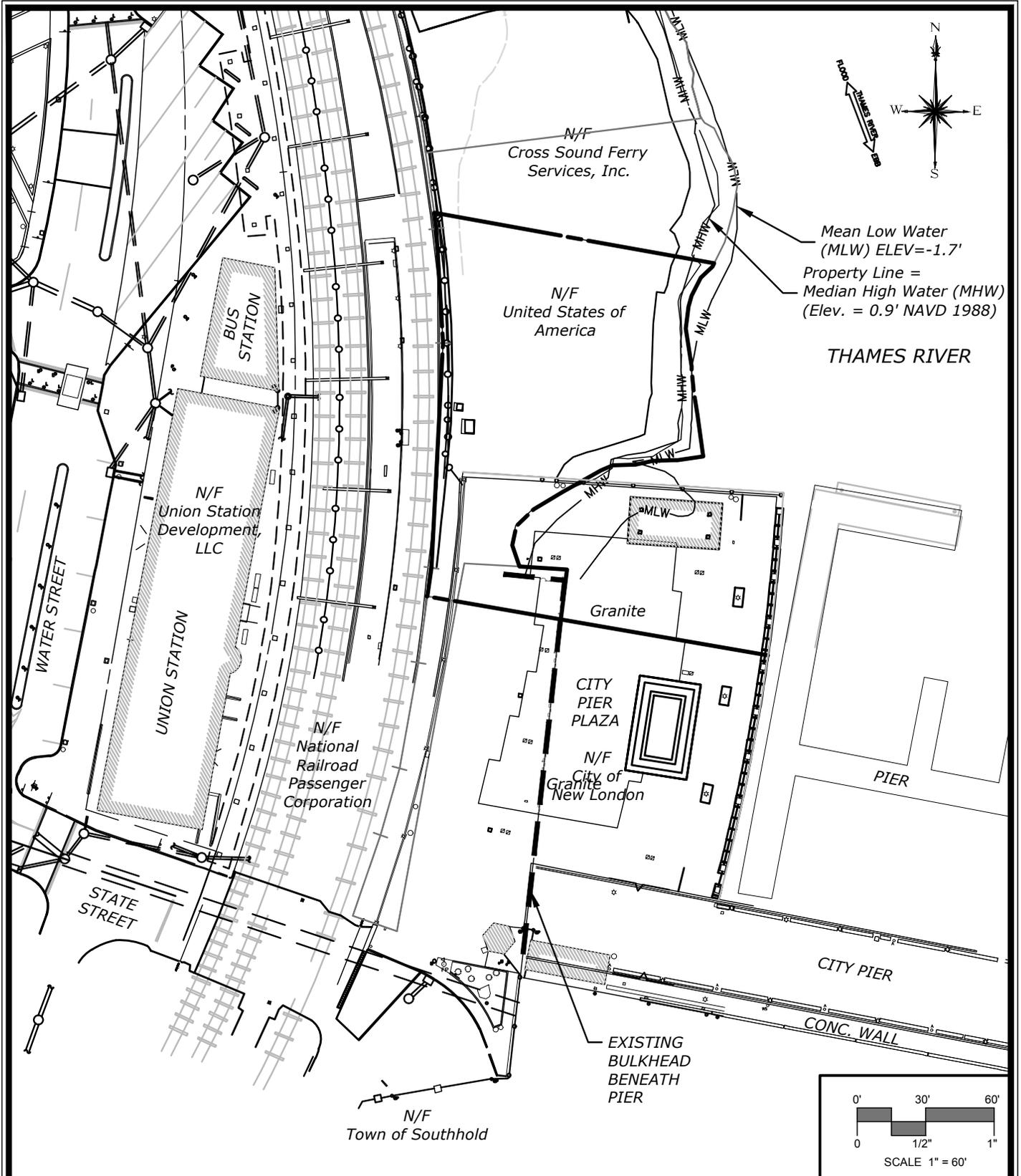
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PROJ. NO. 5139-01		
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DRAWING NAME:
02

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Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



80 REALTY DRIVE
CHEBINE, CT 06410
203.271.7779
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SITE PLAN - EXISTING CONDITIONS

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

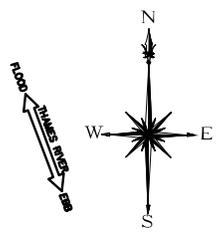
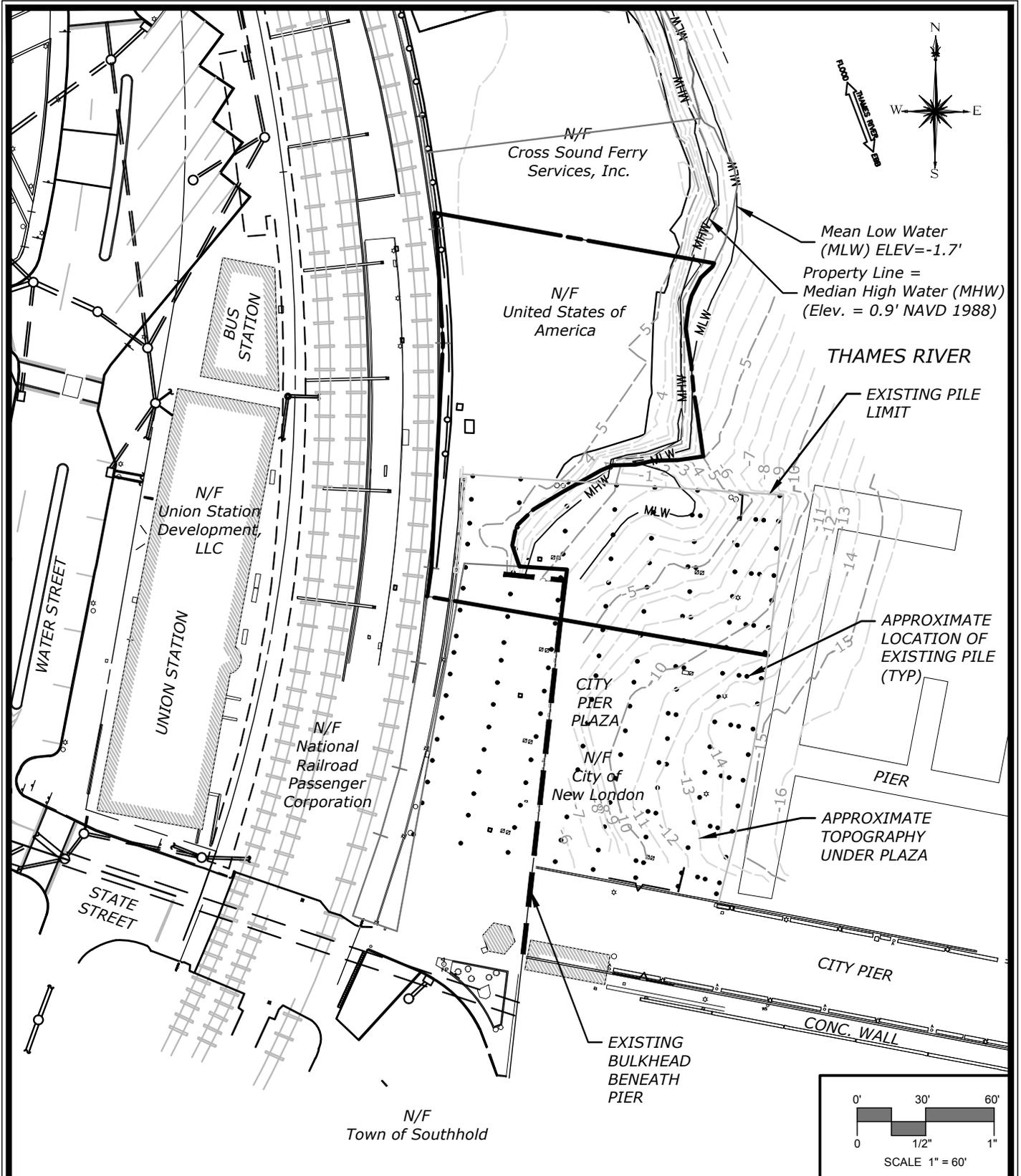
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Plotted by: ROCKE On this date: Fri, 2018 December 21 - 3:08pm



SITE PLAN - EXISTING CONDITIONS

NATIONAL COAST GUARD MUSEUM
 MBLU: G12/ 108/ 1.0/ 1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

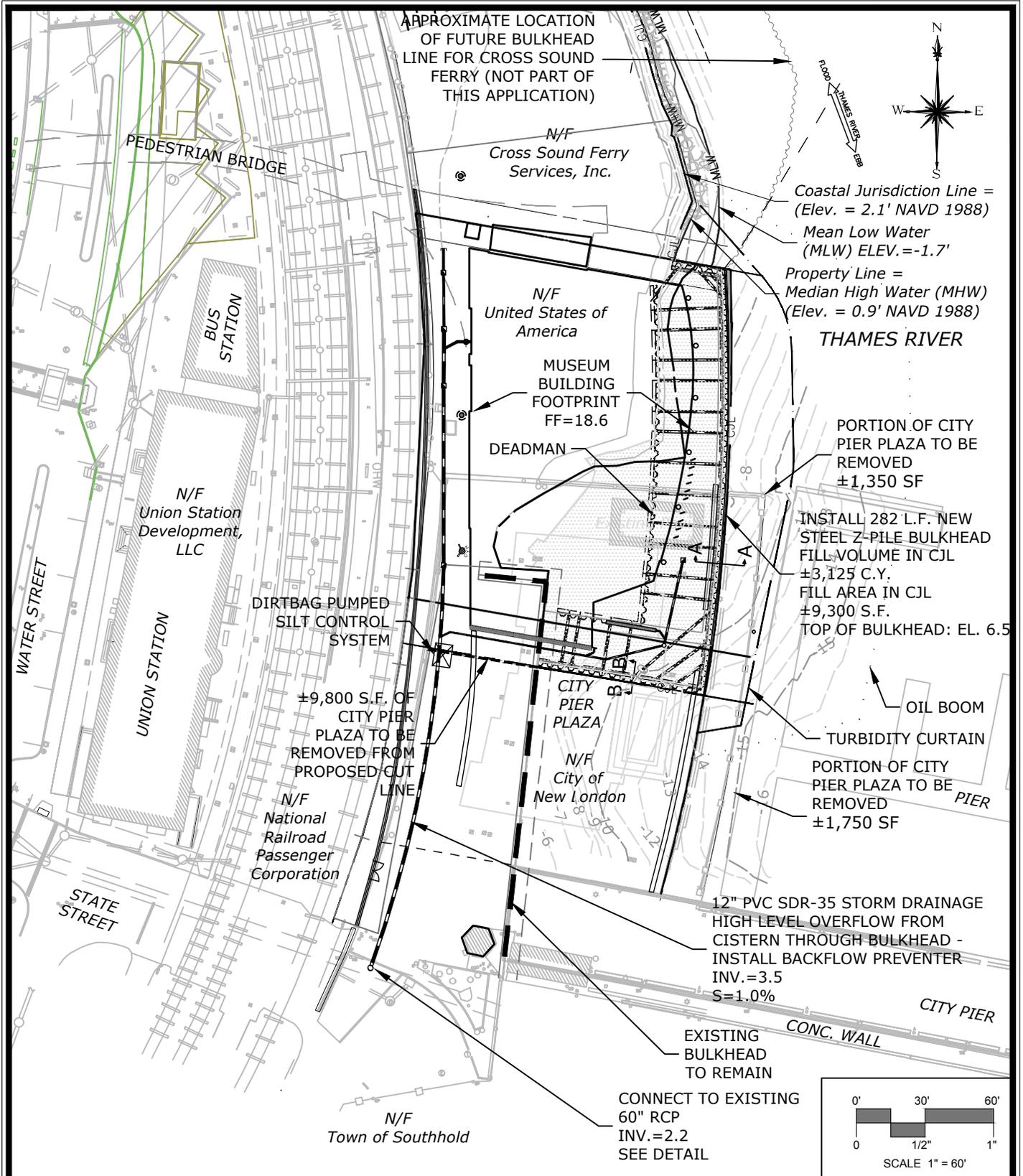
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DRAWING NAME:
04

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Plotted by: ROCKE On this date: Wed, 2020 April 1 - 3:40pm



SITE PLAN - PROPOSED CONDITIONS

NATIONAL COAST GUARD MUSEUM

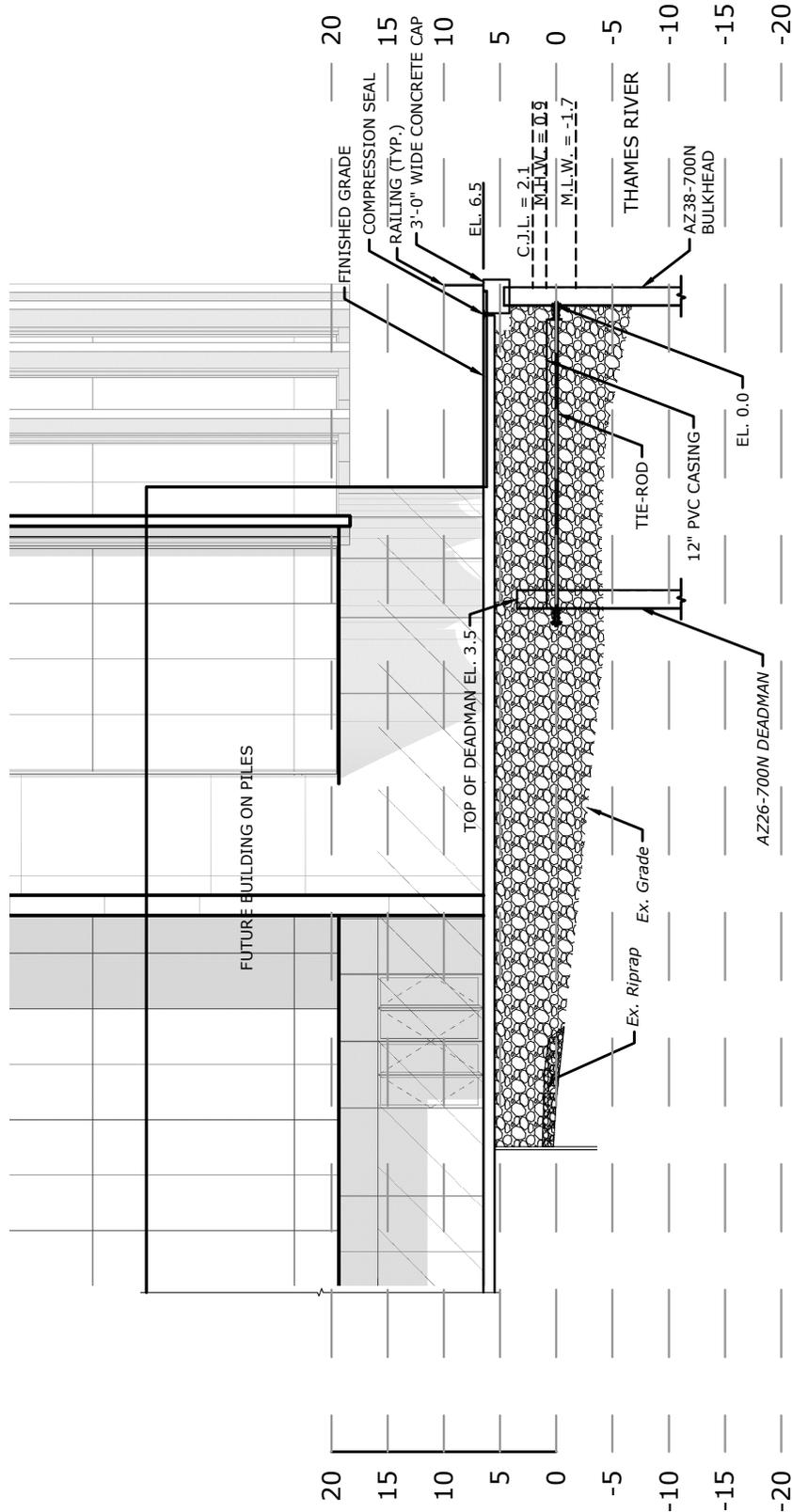
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 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV:

DATE APRIL 1, 2020		
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MILONE & MACBROOM
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 CHESTER, CT 06410
 860.371.7773
 WWW.MMBROOM.COM



SECTION A-A

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---



80 REALTY DRIVE
 CHEBICHE, CT 06410
 203.271.7778
 WWW.MMBC.COM

DATE **APRIL 1, 2020**

SCALE **1/16" = 1'-0"**

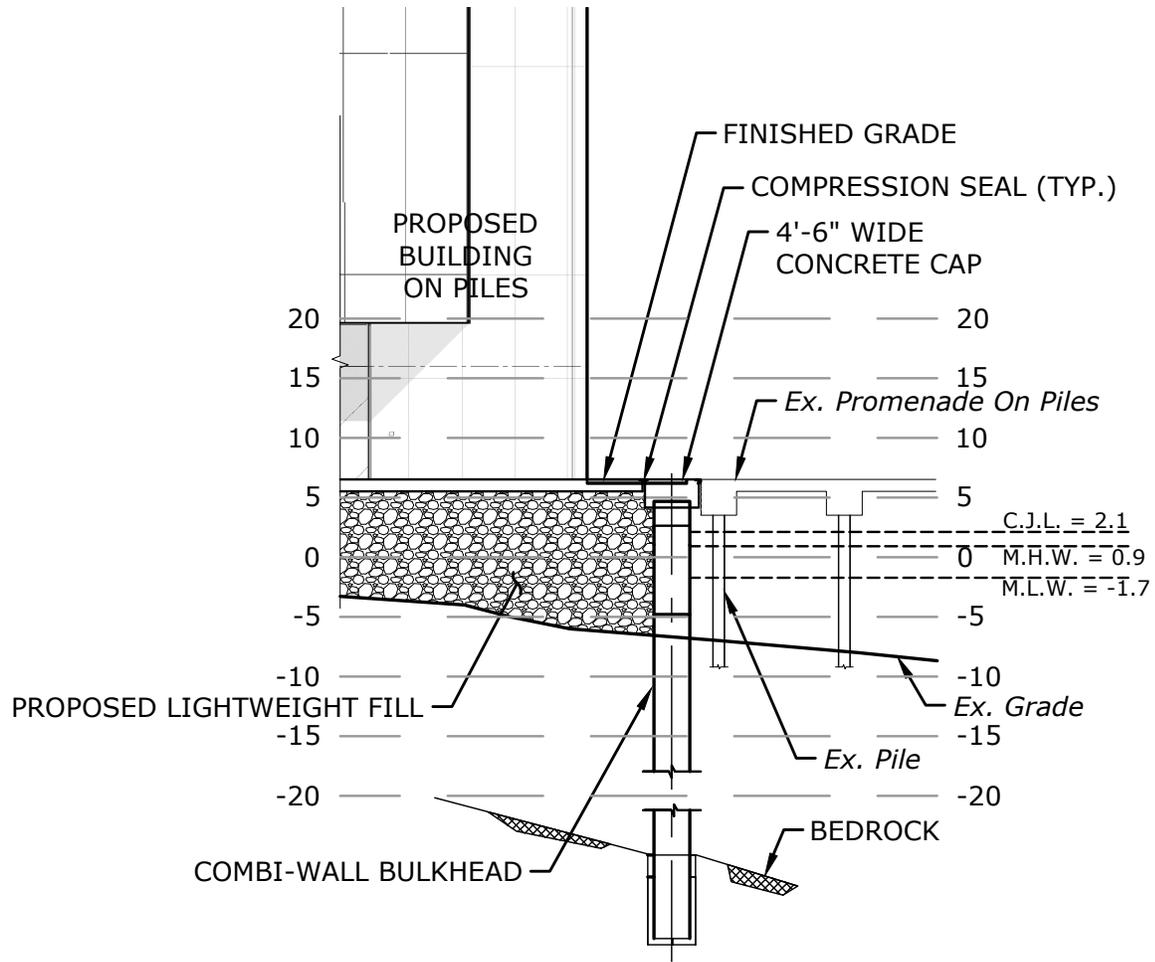
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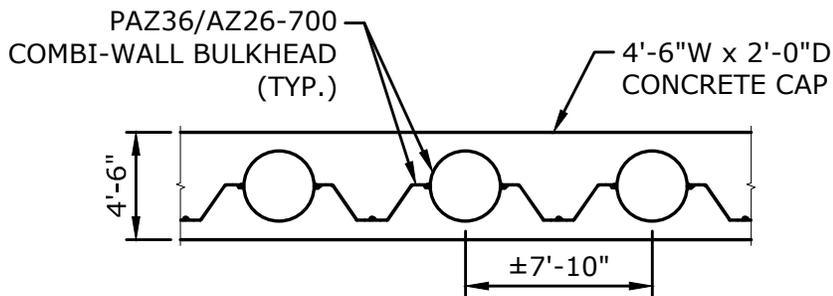
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SECTION B-B



STEEL BULKHEAD - PLAN

SCALE: 1/8" = 1'-0"



SECTION B-B

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
 WATER STREET
 NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE **APRIL 1, 2020**

SCALE **1" = 60'**

PROJ. NO. **5139-01**

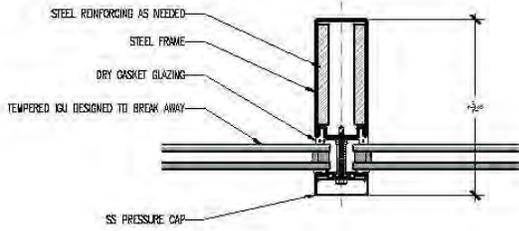
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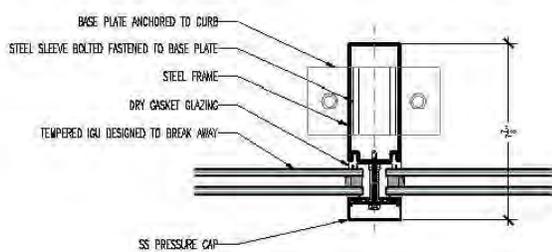
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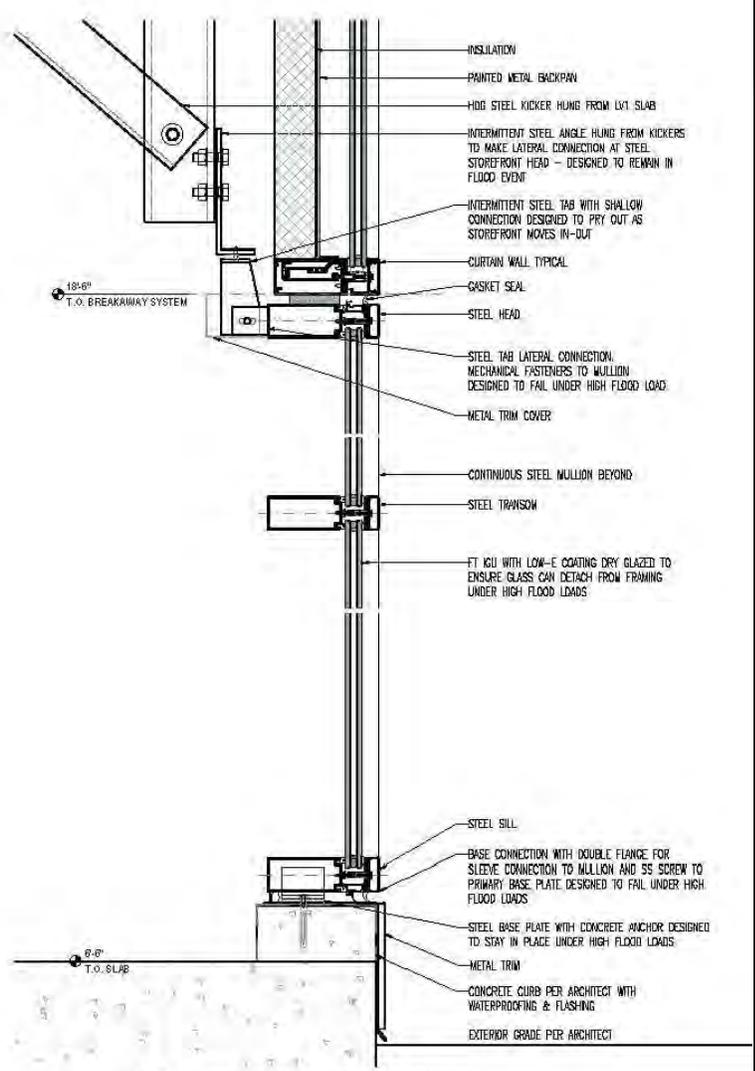
Drawing: V:\DESIGN\5139-01-DE\CAD\COM-ENVIRONMENTAL PERMIT SHEETS\DWG Layout Tab\BREAKAWAY DETAIL



3 PODIUM SF MULLION - TYPICAL
PLAN [SCALE 1:10]



2 PODIUM SF MULLION - BASE CONNECTION
PLAN [SCALE 1:10]



1 PODIUM BREAKAWAY STOREFRONT
SECTION [SCALE 1:16]

NOTE:
BREAKAWAY CURTAINWALL DETAIL IS TYPICAL
AT MUSEUM BUILDING AND PEDESTRIAN BRIDGE
STAIR ENCLOSURE AT GRADE.



BREAKAWAY CURTAIN WALL
NATIONAL COAST GUARD MUSEUM

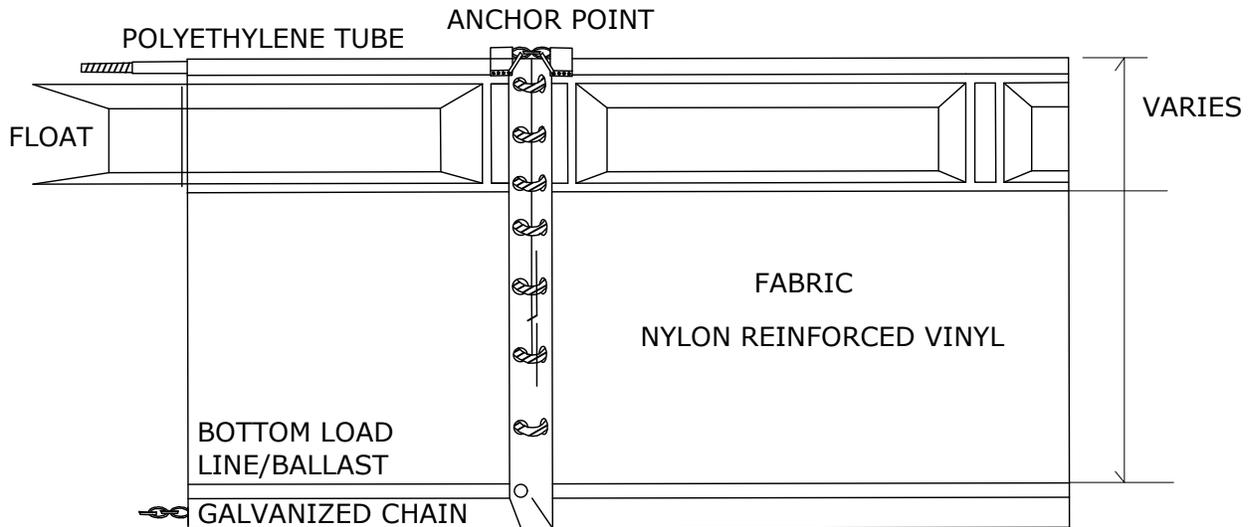
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WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

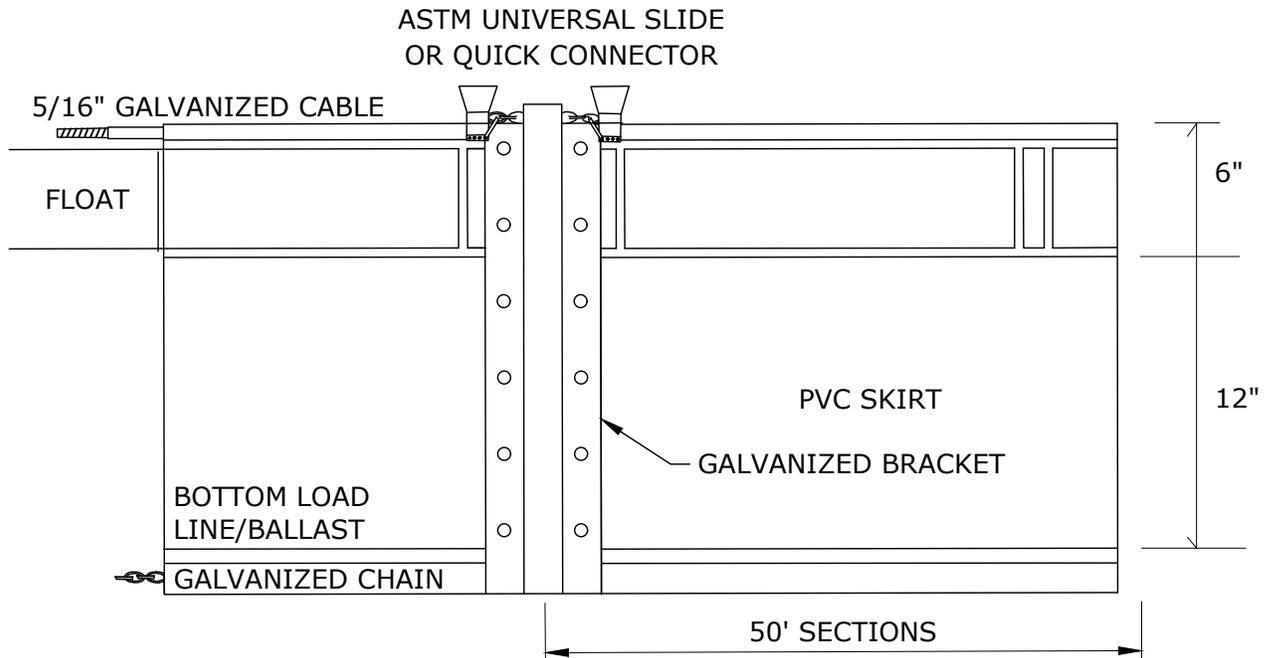
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DRAWING NAME: 08		

Plotted by: ROCKE On this date: Wed, 2020 April 1 - 3:48pm



TURBIDITY CURTAIN

NOT TO SCALE



OIL BOOM

NOT TO SCALE



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MACBROOM**
80 REALTY DRIVE
CHESTER, CT 06410
203.271.7779
WWW.MMBC.COM

TURBIDITY CURTAIN/OIL BOOM

NATIONAL COAST GUARD MUSEUM

MBLU: G12/ 108/ 1.0/1 /
WATER STREET
NEW LONDON, CONNECTICUT

PROJECT PHASE: ENVIRONMENTAL PERMIT

REV: ---

DATE APRIL 1, 2020		
SCALE NOT TO SCALE		
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DRAWING NAME: 09		