



DEPARTMENT OF THE ARMY
HHC, 7TH TRANSPORTATION BRIGADE EXPEDITIONARY
831 MONROE AVE
FORT EUSTIS VA 23604

Received
Electronically
March 7, 2016

REPLY TO
ATTENTION OF:

AFZA-BHA

25 February 2016

Ms. Loree' Randall
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504

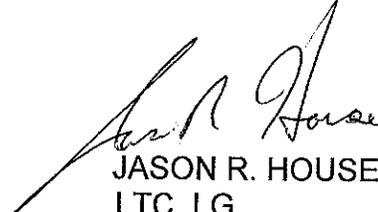
Dear Ms. Randall:

An international, multi-agency training exercise, Cascadia Rising is planned for June 7-16, 2016. The exercise is designed to simulate emergency field response operations following a major Cascadia Subduction Zone earthquake. Conducting successful response operations in the aftermath of a natural disaster requires effective coordination and integration of governments at all levels, as well as non-governmental organizations and the private sector.

The Joint Logistics Over-The-Shore (JLOTS) component of the Cascadia Rising training exercise will demonstrate and assess the ability of joint Army, Navy, Army Reserves, National Guard, and U.S. Coast Guard assets to provide logistical support to disaster response efforts in the Pacific Northwest. Logistics Over-The-Shore (LOTS) is the process of loading and unloading ships without port facilities, so that equipment and cargo can be moved from ship to shore at inadequate or damaged ports or over a bare beach. JLOTS is the integration of multiple military assets working together under a joint task force to complete the LOTS. The proposed JLOTS action alternative would take place at four locations in western Washington: the Port of Tacoma, Naval Magazine Indian Island, Solo Point, and Vashon Island.

The Army is requesting Coastal Zone Management consistency concurrence for this action. The enclosed determination of consistency with the Washington Shoreline Management Act is based on review of applicable sections of the King County and City of Tacoma Shoreline Master Programs.

If you have any questions or need additional information, please contact the U.S. Army Corps of Engineers Seattle District Environmental Coordinator, Ms. Melissa Leslie, (206) 764-6587 or melissa.l.leslie@usace.army.mil.



JASON R. HOUSE
LTC, LG
S3

Enclosure: CZMA Consistency Determination

COASTAL ZONE MANAGEMENT ACT CONSISTENCY DETERMINATION

Coastal Zone Management Act Consistency Determination

The Coastal Zone Management Act of 1972, as amended, requires Federal agencies to carry out their activities in a manner which is consistent to the maximum extent practicable with the enforceable policies of the approved state Coastal Zone Management (CZM) Programs. The Shoreline Management Act of 1972 (SMA; RCW 90.58) is the core of Washington's CZM Program. Primary responsibility for the implementation of the SMA is assigned to local government.

According to 15 CFR Ch. IX § 930.30, the Federal Government is directed to ensure “that all Federal agency activities including development projects affecting any coastal use or resource will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of approved management programs.” The training exercise sponsored by the United States Transportation Command (USTRANSCOM) occurs within the coastal zone governed by multiple municipalities including King County and the city of Tacoma.

The training exercise actions are activities undertaken by a Federal agency; the following constitutes a federal consistency determination with the enforceable provisions of the Washington Coastal Zone Management Program.

1 INTRODUCTION

The proposed Federal action applicable to this consistency determination is the Joint Logistics Over-The-Shore (JLOTS) component of the Cascadia Rising training exercise which will demonstrate and assess the ability of joint Army, Navy, and U.S. Coast Guard assets to provide logistical support to disaster response efforts in the Pacific Northwest sponsored by USTRANSCOM. The draft Environmental Assessment (EA), prepared by the Army, evaluates the impacts of the proposed JLOTS component of the Cascadia Rising training exercise.

The proposed training exercise would take place at four locations in western Washington: the Port of Tacoma, Naval Magazine (NAVMAG) at Indian Island, Solo Point, and Vashon Island (Figure 1). The proposed training exercise would occur June 7-16, 2016; however, JLOTS operations associated with the Cascadia Rising exercise would begin in mid-May and last through June 2016. This timeframe includes site preparation, movement of materials into the region, and site set-up and tear-down, as well as site restoration after the training exercise. Transport of material between sites will include waterborne distribution as well as ground transportation. Limited helicopter transport of personnel may occur. Helicopters would land at existing nearby airports or established landing areas with personnel then transported to the site via ground transport. Helicopters would also be available for medical evacuation in the case on an emergency. In addition, an alternate proposal being considered would only include the NAVMAG Indian Island location. This site could house all activities proposed for the training

exercise. Similar JLOTS training activities were conducted at the Indian Island site in 2005. A brief description of the proposed training activities at each site is included below.

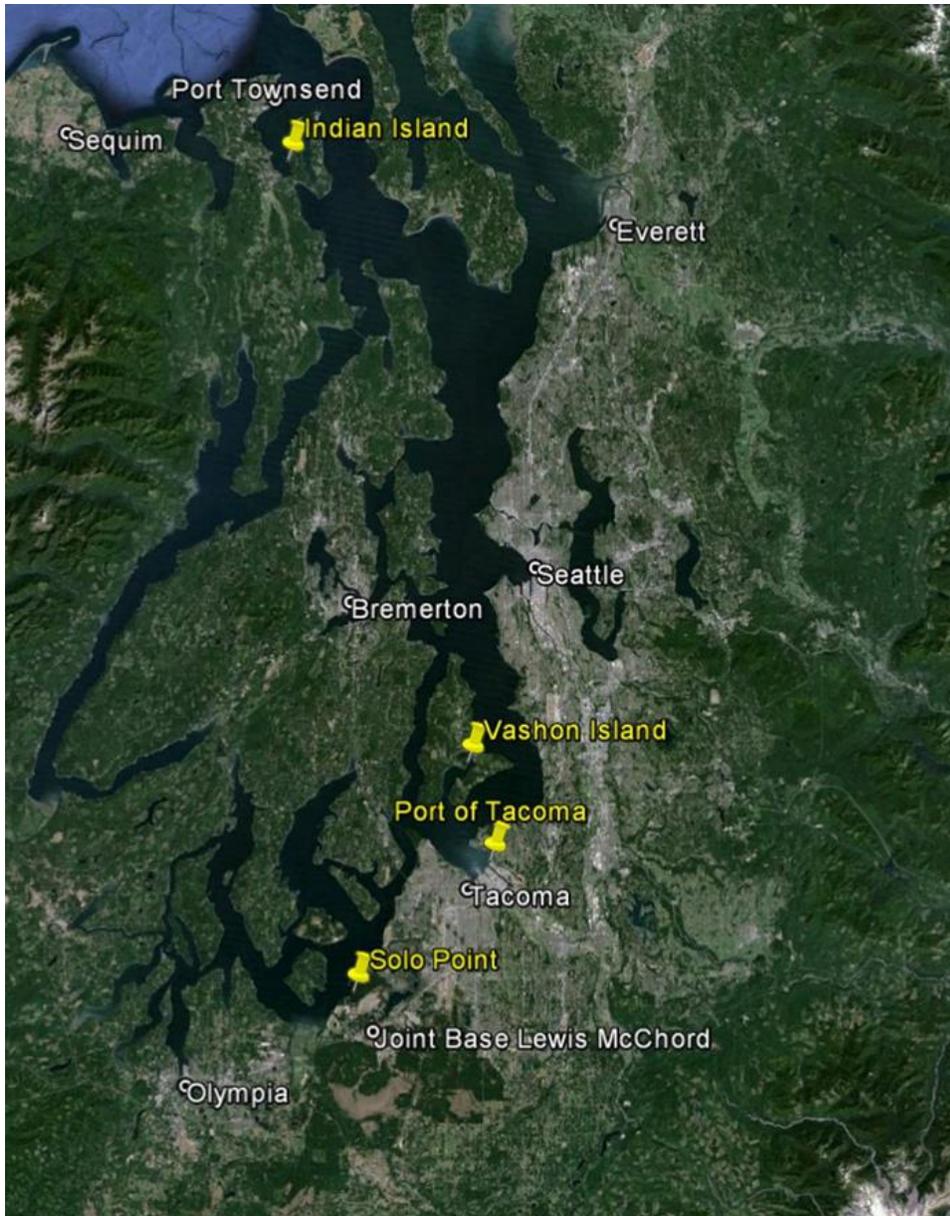


Figure 1. Map of Exercise Locations (yellow).

Port of Tacoma

The U.S. Army Reserve (USAR) Pier, also known as Pier 23, at the Port of Tacoma would serve as the overall mission command node (hub) for the JLOTS portion of the Cascadia Rising exercise. The exercise scenario at this site presumes that the port is largely destroyed with only one usable pier remaining. Tasks at this site would be to receive cargo sent for support, stage equipment in a marshalling yard by commodity, process requests for on-ship movement of

cargo to Indian Island and Vashon Island, and establish interoperability between JLOTS and other non-military Cascadia Rising exercise participants.

The USAR pier currently features a logistics support vessel (LSV), barge derrick crane, and a large tug berthed at the pier; these would be utilized in the operations. All operations at this site would be under an Army command. Operations at the Port of Tacoma would include cargo delivery and transport to the USAR Center and augmented pier, crane operations for movement of cargo at the pier (lift-on/lift-off operations), as well as bare beach landings (roll-on/roll-off operations).

Bare beach operations at the Port of Tacoma would take place at a landing site adjacent to the USAR pier. This site would be used for roll-on/roll-off operations, with cargo discharged directly onto shore from LSV's and/or causeway ferries. Suitable space is available at the site for a marshalling yard/staging area on existing paved surfaces. No construction is required for these operations. Vessels would land between existing piles.

Up to 400 personnel participating in training activities at the Port of Tacoma would be temporarily housed in a tent camp facility erected on a training area at JBLM. Tent camp installation and use is a typical training activity that occurs on JBLM. As such, this activity has been fully analyzed for environmental impacts in the Army's 2010 Final Environmental Impact Statement for Army Growth at Fort Lewis and the Yakima Training Center, WA.

NAVMAG Indian Island

Operations at NAVMAG Indian Island would include cargo delivery and transport (lift-on/lift-off and roll-on/roll-off operations) and liquid transfer activities conducted under a Naval command. Four activity locations have been proposed as shown in Table 1. Approximately 900 Sailors and Soldiers are expected at this location.

Table 1. Indian Island site overview.

Site Designation	Site Name	Activities
Site 1	Main Pier	Lighterage Mooring and Repair Facility; Refueling; Safe Haven
Site 2	Seaplane Ramps	Cargo Transport; Marshalling Yard/Staging Area; Repair Facility; Tactical Operations Center
Site 3	Crane Point Boat Dock	Small Craft Moorage, USCG Boat Moorage, Refueling
Site 4	Life Support Area	Tent Camp Facility, Container Staging Area, Inland Petroleum Discharge System

During JLOTS operations at Indian Island, one prepositioning ship and one chartered vessel containing cargo, supplies, and equipment would be anchored in Port Townsend Bay. The cargo would consist of approximately 200 pieces of rolling stock (i.e. wheeled vehicles), material handling equipment, and up to 150 20-foot containers. During the exercise the cargo,

supplies, and equipment would be offloaded using a variety of craft, including: Improved Navy Lighterage Systems (INLS), LSVs, and Landing Craft Utility (LCU). The Navy's INLS is a system of floating platforms. Lighterage is the transportation of cargo by flat bottomed barges, also known as lighters.

One configuration of the INLS is known as a Roll-On/Roll-Off Discharge Facility (RRDF). An RRDF is a floating platform that is placed adjacent to the ship. A ramp can then be lowered from the ship to the RRDF such that vehicles can be driven off of the ship onto the floating platform. Smaller landing craft can dock at the RRDF and load the vehicles and cargo for transport to the shore.

A second configuration of the INLS is known as a causeway ferry. The causeway ferry is used as a transport for vehicles and large cargo from ship to shore, and has a top speed of 12 knots. The causeway ferry assembly includes a Power section (with engine and controls), an Intermediate section, and a Beach section (with ramp).

In addition to the causeway ferry, other landing vessels may be used to transport vehicles and cargo from the ship to the shore. Cargo could be loaded onto the vessels via the RRDF or using the ship's crane. Vessel operations would use existing chartered navigable waterways that are available for public use and would follow all applicable navigation rules. The JLOTS afloat operations should not interfere with normal boating traffic between NAVMAG and Port Hadlock/Port Townsend. A Notice to Mariners would be issued regarding this exercise. For all vessel landings, no anchor drops would be done (nor are permitted) within 300 feet of the shoreline (mean higher high water), due to the presence of eelgrass beds.

Exercises at Indian Island would also include training in force security. In-water force protection is typical in an exercise, and would be provided by the U.S. Coast Guard and would include area patrols by up to six small (28 to 34 ft) security boats that are stationed around supply ships

Solo Point

Solo Point is an existing gravel beach on Joint Base Lewis-McChord (JBLM). This beach is regularly used for bare beach landing training events. As part of the Cascadia Rising Training, the existing boat ramp at this site would be used for landing of Army landing vessels for Roll On/ Roll Off operations. On 7 June 2015, up to 40 National Guard vehicles would be loaded onto boats or a causeway ferry for transport to Vashon Island.

Vashon Island

JLOTS has been asked to assist the National Guard Soldiers with transport to and from Vashon Island. The boat dock at Jensen Point would be used to discharge Soldiers and cargo at the beginning of the training event. The proposed date for the event is 7 June 2015. Activities would involve LSVs and/or Causeway Ferries approaching the ramp and discharging cargo at the ramp. The offload would be scheduled for high tide, however if the ramp is unexpectedly

inaccessible, a bare beach landing would be completed. If a bare beach landing is used, mats will be placed onto the beach to reduce the impacts of vehicles on the beach sediments.

On 9 June 2015, a public demonstration and media event is also proposed for this site. As on the 7th, LSUs and/or causeway ferries would approach the area and offload vehicles. The vehicles are expected to travel a short duration and return to reload onto the vessel for departure.

On 11 June 2015, JLOTS will assist the National Guard with their retreat from the island. The actions will essentially be the reverse of 7 June, with vehicles travelling to Jensen Point for loading onto JLOTS vessels either via the ramp or potentially via the bare beach.

The site at Solo Point is located on JBLM which is in Pierce County and the site at Indian Island is part of the Naval Magazine which is in Jefferson County. Both sites are located in coastal counties included in the Washington State Coastal Zone Management Program and subject to the CZMA. However, the CZMA specifically excludes lands that are owned, leased, or held in trust by the federal government from regulation. Excluded federal lands within Washington's coastal zone include military reservations and other defense installations.

This determination of consistency with the Washington Coastal Zone Management Act is based on review of applicable sections of the State of Washington Shoreline Management Program and policies and standards of the King County Shoreline Master Program (SMP) and City of Tacoma SMP. Applicable sections of the plans are presented below, with the Army's consistency indicated in ***bold italics***.

2 STATE OF WASHINGTON SHORELINE MANAGEMENT PROGRAM

The Shoreline Management Act of 1972 (RCW 90.58) is the core of authority of Washington's CZM Program. Primary responsibility for the implementation of the SMA is assigned to local government, in this case, King County and the City of Tacoma.

3 KING COUNTY SHORELINE MASTER PROGRAM

Chapter 5 (Shorelines) of the King County SMP identified the boat dock at Jensen Point on Vashon Island with a Conservancy Shoreline designation. All applicable policies and regulations within Title 21A of the King County Municipal Code, specifically Title 21A.25 "Shorelines" were reviewed for the proposed transport of National Guard Soldiers and vehicles to Vashon Island. No development or physical modification of the shoreline is proposed and the action is short duration (three partial days over one week). Therefore, the proposed action has been determined to be consistent with the King County SMP. Applicable policies and regulations of the King County SMP as found in the municipal code are presented below with the Army's consistency indicated in ***bold italics***.

21A.25.060 Names of Shoreline Environments Designations; C. Purpose; 4:

The purpose of the Conservancy shoreline is to conserve areas that are a high priority for restoration, include valuable historic properties or provide recreational opportunities.

Consistent to the maximum extent practicable. The proposed action at Jensen Point Park would temporarily limit recreational opportunities during Roll-On/Roll-Off operations on 7, 9 and 11 June 2016. There would be no permanent impacts to recreational opportunities at the park.

21A.25.090 Shoreline use and modification - defined - no net loss of shoreline ecological functions allowed - sequencing compliance; C:

King County shall ensure that uses and modifications within the shoreline jurisdiction do not cause a net loss of shoreline ecological functions and comply with the sequencing requirements under K.C.C. 21A.25.080. (Ord. 16985 § 30, 2010).

Consistent. The proposed action would not result in any net loss of shoreline ecological functions. The actions at Jensen Point Park would be limited to Roll-On/Roll-Off operations on 7, 9 and 11 June 2016. No physical modification to the shoreline would occur.

4 CITY OF TACOMA SHORELINE MASTER PROGRAM

The Shoreline Management Act applies to all marine waters of the state below the Ordinary High Water Mark (OHWM), as does local shoreline jurisdiction. The Port of Tacoma site is located within the “S-10 - Port Industrial” Shoreline District, in an area environmentally designated as “Urban.” Applicable policies and regulations of Title 13 of the City of Tacoma Municipal Code, “Land Use Regulatory Code” are presented below with the Army’s consistency indicated in *bold italics*.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 1:

For the purposes of determining to which uses and activities this classification applies, the use of moorage facilities, such as a wharf or pier, for the layberthing, or lay-by berthing of cargo, container, military, or other oceangoing vessels shall be permitted only where port and industrial uses are allowed. This use category shall likewise apply to facilities that handle the loading and unloading of cargo and materials associated with port and/or industrial uses.

Water-dependent port and industrial uses shall have shoreline location priority over all other uses in the S-7 and S-10 Shoreline Districts.

Consistent. The proposed training exercise includes port type uses such as offloading cargo from the USAR Pier. The logistics support vessel (LSV), barge derrick crane, and a large tug berthed at the pier would be utilized as part of the training exercise.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 2:

The location, design, and construction of port and industrial uses shall assure no net loss of ecological functions.

Consistent. The proposed action would not result in any net loss of shoreline ecological functions. The actions at the Port of Tacoma would be limited to Lift-On/Lift-Off operations at the USAR Pier, Roll-On/Roll-Off bare beach landings, floating modular causeway system and set-up of marshalling area and life support area. No physical modification to the shoreline would occur.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 5:

Where shoreline stabilization or in-water structures are required to support a water-dependent port or industrial use, the applicant shall be required to demonstrate:

- a. That the proposed action shall give special consideration to the viability of migratory salmonids and other aquatic species;
- b. That contaminated sediments are managed and/or remediated in accordance with state and federal laws;
- c. That public access to the water body is provided where safety and operation of use are not compromised;
- d. That shading and water surface coverage is the minimum necessary for the use.

Consistent. For purposes of the training scenario, a floating modular causeway system would be used to augment the existing pier. The causeway system would be in place for the short duration of the training exercise. No permanent infrastructure would be constructed as a result of the proposed action. Additional shading associated with the causeway system would be minor and temporary in nature. Salmonids (adults and juveniles) may migrate through Commencement Bay during the JLOTS action, however the area is routinely used by large boats for various Port and recreational activities. The addition of boats in the project area for cargo movement is not a changed condition that would be expected to impact migration activities.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 6:

Port and industrial development shall comply with all federal, state, regional and local requirements regarding air and water quality.

Consistent. During site preparation, the training exercise and restoration following the exercise, there would be temporary and localized decreases in air quality due to emissions from heavy machinery, marine vessels, equipment and vehicles. These emissions are not anticipated to exceed EPA's de minimis threshold levels (100 tons/year for carbon monoxide and 50 tons/year for ozone) or affect the implementation of Washington's Clean Air Act implementation plan. Proposed actions at the Port of Tacoma would be similar to ongoing port operations and would have negligible impacts to water quality. All vessels and vehicles would be equipped with appropriate spill response kits and best management practices would be in place to ensure no release of pollutants into Commencement Bay.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 8:

Best management practices shall be strictly adhered to for facilities, vessels, and products used in association with these facilities and vessels.

Consistent. All vessels and vehicles would be equipped with appropriate spill response kits and best management practices would be in place to ensure safe handling of materials and operations for human and environmental health and safety.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 9:

All developments shall include the capability to contain and clean up spills, discharges, or pollutants, and shall be responsible for any water pollution which they cause.

Consistent. All vessels and vehicles would be equipped with appropriate spill response kits and best management practices would be in place to ensure no release of pollutants into water or onto land.

7.6 Port/Industrial Use; 7.6.2 Regulations; A. General Regulations; 11:

Procedures for handling toxic materials in shoreline areas shall prevent their entering the air or water.

Consistent. Fueling operations at the Port of Tacoma may occur both onshore and offshore. Refueling onshore would be conducted at existing fuel facilities or by a fuel truck. Generators would be placed within appropriately sized containment units to catch any fuel or lubricants in the event of a spill or leak. Fuel trucks would establish a secondary containment area for each refueling session. No onshore refueling of vehicles or equipment would occur within 150 feet from any waterbody. Best management practices would be implemented to ensure safe handling of toxic materials such as fuels and lubricants. For offshore refueling, a commercial offshore refueling vessel would be brought to Pier 23 and a containment system of absorbent booms would be established. Refueling offshore would be conducted from ship-to-ship under existing Navy/Coast Guard and state rules and regulations. Additionally, refueling may occur at existing commercial marine fueling facilities. Spill kits would be available at all fueling locations, offshore and onshore.

7.12 Solid Waste Disposal; 7.12.2 Regulations; 1-4:

Solid waste refers to all solid and semi-solid wastes, except wastes identified in WAC 173-304-015, including, but not limited to, junk vehicles, garbage, rubbish, ashes, industrial wastes, swill, demolition and construction wastes, abandoned vehicles or parts thereof, and discarded commodities, but excluding agricultural wastes and crop residues returned to the soil at agronomic rates. This includes all liquid, solid and semi-solid materials which are not the primary products of public, private, industrial, commercial, mining and agricultural operations. Solid waste includes but is not limited to sludge from wastewater treatment plants and septage from septic tanks, wood waste, dangerous waste, and problem wastes. Unrecovered residues from recycling operations shall be considered solid waste.

1. Permanent treatment and/or storage facilities for solid waste shall be prohibited in the shorelines. All garbage shall be deposited in trash or recycling receptacles. The handling of all solid waste in the shoreline shall conform to the provisions of TMC 12.09.
2. Disposal of hazardous substances or other materials generated, treated, or disposed of in conjunction with an environmental cleanup is permitted if in accordance with State and Federal regulations.

3. No person shall throw, discharge, or deposit from any vessel or the shore, pier, wharf, dock, float, or otherwise, any refuse matter of any kind whatsoever into or upon the waters or land area of Tacoma or Puget Sound, in accordance with local refuse disposal requirements.

4. No person shall dump or discharge oil, spirits, flammable liquid, or contaminated bilge water into or upon the waters or land areas of Tacoma or Puget Sound.

Consistent. All waste generated by the proposed training exercise would be disposed of at an off-site approved location. No substances or refuse would be placed into or upon waters or land area of Tacoma or Puget Sound.

8.6 Moorage Facilities; 8.6.2 Regulations; A. General Regulations; 1-3:

Moorage facilities refer to piers, wharves, docks, floats, mooring buoys and other structures (either fixed or floating), to which vessels may be secured. Where piers, wharves, docks, and floats are proposed for purposes other than moorage, for example a fishing pier, the structure shall be subject to the policies and standards of this section, where applicable.

1. There shall be no net loss of ecological functions as a result of development of moorage facilities and associated recreational opportunities.

2. Moorage facilities shall be located, designed, constructed, and operated so as to minimize impacts to shoreline resources and unnecessary interference with the right of adjacent property owners, public navigation of public waters, as well as adjacent shoreline or water uses.

3. Extended moorage on waters of the State without a lease or permission is prohibited.

Consistent. The proposed action would not result in any net loss of shoreline ecological functions. Vessel mooring and floating modular causeway system would remain at the Port of Tacoma during the short duration of the training exercise. No extended moorage would occur and no physical modification to the shoreline would occur.

8.6 Moorage Facilities; 8.6.2 Regulations; C. Piers, Wharves, Docks and Floats; 1-3:

1. New piers, wharves, docks, and floats may be permitted only for water-dependent uses or public access and shall be restricted to the minimum size necessary to serve a proposed water-dependent use.

2. Design and construction of all piers, wharves, docks, and floats is required to avoid, minimize, and mitigate for impacts to ecological processes and functions and to be constructed of approved materials.

3. Pilings for newly constructed piers, wharves, docks, and floats shall be of materials other than treated wood or creosote. The afore cited prohibition does not apply to fender systems, mooring bollards, dolphins, batter walls or wing walls; nor wood treatments deemed acceptable in the future by State and Federal agencies with expertise. For replacement of the pilings in an existing pier, wharf, dock, or float, materials other than treated wood shall be used unless extreme adverse economic or engineering impacts can be demonstrated. The exceptions listed above also apply to this limitation.

Consistent. The proposed action would utilize the existing USAR pier and a floating modular causeway system. No new moorage facilities or permanent modification of existing facilities would occur as a result of the proposed action.

9.12 S-10 Port Industrial Area (HI); A. Intent

The intent of the S-10 Port Industrial Area Shoreline District is to allow the continued development of the Port Industrial Area, with an increase in the intensity of development and a greater emphasis on terminal facilities within the City.

Consistent. The proposed training exercise would not inhibit continued development of the Port Industrial Area. The proposed action is temporary and would have no long-term impacts to the surrounding area.

5 FEDERAL WATER POLLUTION CONTROL ACT

The Army has discussed the proposed training activities with the U.S. Army Corps of Engineers (USACE) Seattle District Regulatory Program. Per these discussions, the Army concludes that the JLOTS training exercise is not subject to regulation under Sections 404 and 401 of the Clean Water Act. The exemption applies because no dredged or fill material would be placed waterward of mean higher high water at all project locations.

6 CLEAN AIR ACT

The proposed action has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. The project constitutes training exercise activities generating an increase in emissions that are clearly *de minimis* under 40 CFR 93.153(c)(2)(iv). For this reason, a conformity determination is not required for this project.

7 STATE ENVIRONMENTAL POLICY ACT

The proposed action is a Federal action subject to NEPA and SEPA is not applicable.

8 ENERGY FACILITY SITE EVALUATION COUNCIL LAW

The proposed action does not involve siting of energy facilities in the state of Washington and does not apply to the proposed action.

9 OCEAN RESOURCES MANAGEMENT ACT

The proposed action includes sites in the Salish Sea which is a waterbody connected to the Pacific Ocean. The enforceable policies of Chapter 43.143 RCW apply to coastal waters of the Pacific Ocean. The proposed action is a training exercise to demonstrate response capabilities in the event of a natural disaster. Disaster preparedness is needed for the region as a whole and the short-term nature of the exercise minimizes any adverse impacts to humans and the environment. There would be no significant long-term impacts to coastal or marine resources or uses. Therefore, the proposed action is in compliance with this Act.

10 STATEMENT OF CONSISTENCY

Based on the above evaluation, the Army has determined that the proposed training exercise activities are consistent with the applicable policies and regulations specified in the Shoreline Master Programs for King County and the City of Tacoma. The proposed action is thus considered to be consistent to the maximum extent practicable with the enforceable policies of the State of Washington Shoreline Management Program and policies and standards of the Shoreline Master Programs for King County and the City of Tacoma.