



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, JOINT BASE LEWIS-MCCHORD
1010 LIGGETT AVENUE, BOX 339500, MAIL STOP 1AA
JOINT BASE LEWIS-MCCHORD, WA 98433-9500

Public Works

Federal Consistency Coordinator
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Dear Federal Consistency Coordinator:

Pursuant to the National Environmental Policy Act (NEPA), the U.S. Army has prepared an Environmental Assessment (EA) to analyze the impacts of proposed construction and operation of a new Waste Water Treatment Plant (WWTP) at Joint Base Lewis McChord (JBLM) in Pierce County, Washington. The proposed action would be located just south of JBLM's existing WWTP at Solo Point (see page 15 of the EA). The purpose and need of the action is to improve water quality, comply with Federal regulatory requirements, and to improve sustainability at the installation.

To comply with Subpart C of the National Oceanic and Atmospheric Administration, Federal Consistency Regulation, 15 CFR 930 and Coastal Zone Management Act §307 (c) (1), as amended, the U.S. Army is requesting concurrence on a Coastal Consistency "Negative Determination" for this action.

The overall project JBLM proposes is a two-phased construction effort to replace the existing Solo Point WWTP and further progress JBLM towards reusing treated wastewater. In Phase I, JBLM would construct a new treatment plant to replace the existing WWTP at Solo Point. The new WWTP would utilize membrane bioreactor technology and would meet Class A standard for treated wastewater. The existing outfall would remain in use and operation of the new WWTP would fall under the Army's existing National Pollutant Discharge Elimination System (NPDES) permit which was approved April 1, 2012 and will remain valid until April 1, 2017.

Phase II of the project represents the Army's long-term plans to construct a Reclaimed Water Distribution System (RWDS) and new outfall. Phase II of this project has not been programmed for designed, but basic elements would include: The demolition of the existing WWTP; the construction of the RWDS facility; and the construction of RWDS pump stations and infrastructure for bringing water back up-grade from the new WWTP to the JBLM cantonment area. Reclaimed water would be used for irrigation, stream flow augmentation, and industrial facilities, as well as at other facilities in order to meet the Army's sustainability goals and to reduce potable water consumption on the installation. The new outfall and diffuser would be placed adjacent to the existing outfall. Although the RWDS is expected to negate the regular need for an outfall, as the water would not regularly be discharged through it once the RWDS is fully operational, the new outfall would be used as an interim function during RWDS construction, and then provide backup operation when maintenance is performed on the RWDS.

The EA included an analysis of potential environmental impacts associated with the construction and operation of a new WWTP. It also reviewed the proposed outfall and installation of main pipeline infrastructure for reclaimed water usage at a programmatic level only, since specific plans for this phase has not yet been programmed or designed. Further NEPA documentation and environmental review, including a review for Federal Consistency, would be required if the Army pursues Phase II of this action.

The construction of a new WWTP, as described within Alternative B of the EA and draft Finding of No Significant Impact, would comply to the maximum extent practicable with the enforcement policies of the six laws identified in Washington's Coastal Zone Management Program. They are as follows:

1. **The Shoreline Management Act (SMA)** – The SMA is not applicable to JBLM properties.
2. **The State Environmental Policy Act (SEPA)** –JBLM has submitted the WWTP EA for adoption as allowed under SEPA requirements [WAC 197-11-610].
 - (1) An agency may adopt any environmental analysis prepared under the National Environmental Policy Act (NEPA) by following WAC [197-11-600](#) and [197-11-630](#).
 - (2) A NEPA environmental assessment may be adopted to satisfy requirements for a determination of nonsignificance if the requirements of WAC [197-11-600](#) and [197-11-630](#) are met.
3. **The Clean Water Act (CWA)** – The project will be in compliance and consistent with the CWA. JBLM's Stormwater Pollution Prevention Plan would be followed to avoid stormwater contamination from construction activities. Operation of the new WWTP would occur under the Army's existing NPDES permit, which will remain valid until April 1, 2017.
4. **The Clean Air Act (CAA)** -- Portions of Pierce County, including southern Tacoma and JBLM, are designated a nonattainment area. The boundary for the nonattainment area is adjacent to the eastern boundary of JBLM but does not include the Installation. The applicable General Conformity Rule (GCR) *de minimis* levels for JBLM (Pierce County portion) are 100 tons/year of CO (40 CFR 93.153). The project will not increase air impacts and is in compliance with the CAA.
5. **The Energy Facility Site Evaluation Council (EFSEC)** – The proposed action does not reach a threshold to be analyzed by EFSEC and would be considered not applicable.
6. **The Ocean Resource Management Act (ORMA)** -- The proposed action does not reach a threshold to be analyzed by ORMA and would be considered not applicable.

Based on the effects analysis conducted in the EA and review of compliance with the above six laws, the U.S. Army has determined that the proposed action will not affect coastal uses or resources of the coastal zone. Therefore, a Coastal Zone Consistency Determination is not required for the proposed action. Additional details of the proposed action are enclosed to assist you in your review. If you have questions, please contact me at (253) 966-1760 or paul.t.steucke.civ@mail.mil. Thank you for your assistance in this matter.

Sincerely,

Paul T. Steucke, Jr.
Chief, Environmental Division

Enclosure